



August 31, 2021

Project No. 0606

Guelph City Hall
 1 Carden Street
 Guelph, Ontario
 N1H 3A1

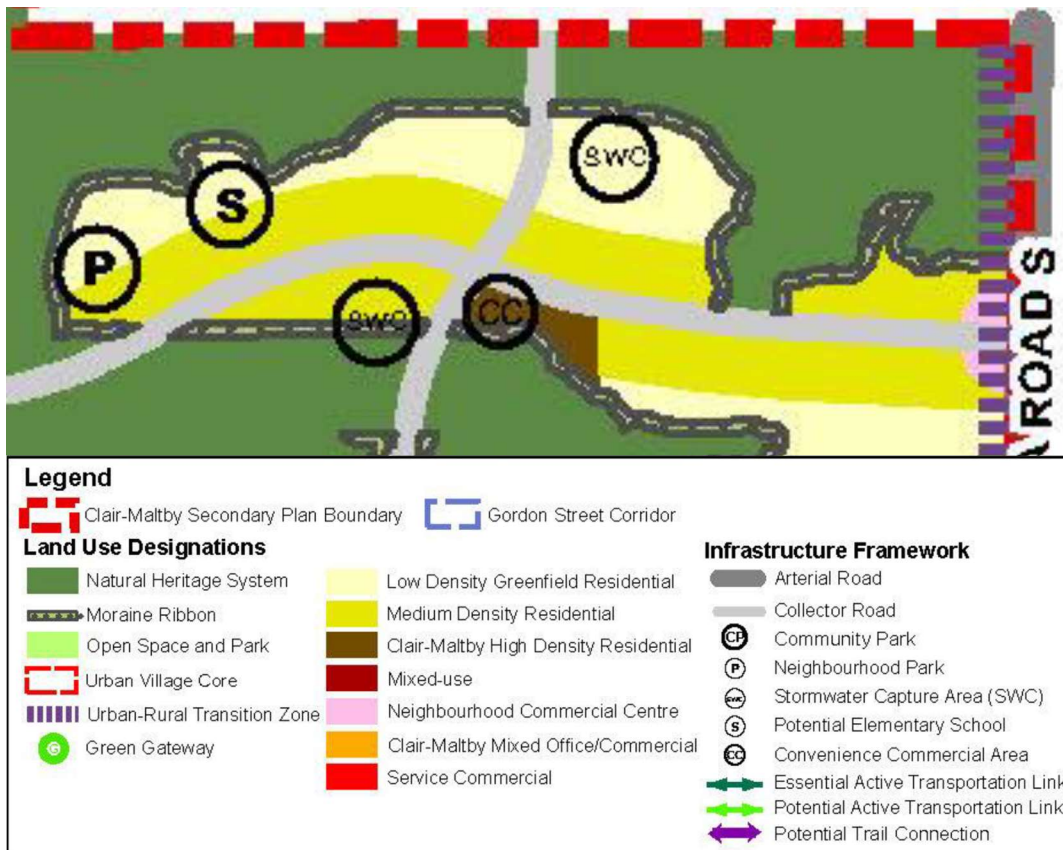
Attention: Mayor Cam Guthrie and Members of Council

Re: **Clair-Maltby 11.3 Draft Secondary Plan
 Final Draft for Community Engagement June 16, 2021**

I am the planning consultant providing these comments on behalf of South Edge Ltd., the owner of 2007 Victoria Road South, located within the Clair-Maltby Secondary Plan area located to the south of Rolling Hills.

For reference, I have included an excerpt below showing the subject property from Schedule B – Land Use Plan (DRAFT) found on page 50 of the Draft Secondary Plan.

Schedule B – Land Use Plan (DRAFT)



As noted in the attached letter from the owner's solicitor, the Draft Secondary Plan mapping is not consistent with the **OPA No. 42 settlement mapping**. The moraine ribbon is a land taking beyond the designations within the agreed to minutes of settlement. The owner is requesting that the Clair-Maltby mapping and policies be revised to be consistent with the minutes of settlement.

Natural Resource Solutions Inc. have prepared a memo which is included as an attachment to this letter.

With respect to the **moraine ribbon** shown in the Draft Clair-Maltby mapping, this feature is neither a required environmental element since the Natural Heritage System features and buffers are already identified and protected within the Official Plan designation, nor is it clearly parkland dedication in the draft secondary plan policies. The moraine ribbon may be included as trails and parkland and if this is the case it should be included in the required parkland dedication requirement and be clearly articulated in the policies. Unfortunately, the moraine ribbon is not located where there are pedestrian and cycling desire lines of travel. The moraine ribbon proposal will result in land needed to provide housing and other uses within the urban area not being available. Approximately 46% of the Clair-Maltby secondary plan area is protected as part of the Natural Heritage System. In addition, there will be schools, parks, stormwater management areas and newly proposed stormwater management overflow areas, and roads which will all reduce the land available for housing and other urban land uses. The moraine ribbon should not be included within the secondary plan. Instead, there should be a policy to accept a percentage of the trail connections as part of the required parkland dedication received by the City.

The Clair-Maltby policies should specifically state that it is the city's responsibility to prepare the management plan for **Halls Pond** to establish appropriate access, recreational use, and restoration, consistent with the preservation and protection of ecological and hydrologic features and functions. The City will ultimately be the owner of this pond and there are a number of surrounding properties which contribute flows to the pond but do not have access to the pond.

There are two small Neighbourhood Commercial Centre designations along Victoria Road South and a Convenience Commercial symbol indicated on the subject property. These three small commercial designations should be removed from Clair-Maltby Secondary Plan mapping as they apply to the subject property. Rather than map these **small commercial areas** on the plan, the policies should permit convenience commercial uses within residential designations as per the current Guelph Official Plan policies. If there is market demand for these small commercial areas then they will be provided. If there is no market demand it is not reasonable for the landowner to have to amend the Official Plan to remove these designations in the future. A policy approach will allow flexibility for the market demand for commercial to be met.

There is a new **Stormwater Capture Area** symbol shown on the subject property. The draft policies refer to an overflow area for stormwater which may have the potential to sterilize large areas of land to store stormwater rather than designing stormwater management facilities to actively treat and infiltrate stormwater. This property has a large area in the north west corner (within the Natural Heritage System) that can naturally accommodate stormwater overflow. The "SWC" symbol should be relocated to this feature. The OPA No. 42 minutes of settlement for this property include provisions that address modifications to the Significant Landform policies allowing for essential storm water outlets for treated Stormwater discharge. The landowners have been requesting a technical meeting to review the engineering approach for this area and we would appreciate this technical meeting being scheduled by the city.

We question the need and the appropriateness for the **collector road** to connect to the north through the Rolling Hills community. The north portion of the collector road should be deleted from the Secondary Plan.

Thank you for the opportunity to provide these comments. Please let us know if you would like to discuss any of these comments further.

Yours truly,

A handwritten signature in blue ink, appearing to read 'AClos', is positioned above the typed name.

Astrid Clos, MCIP, RPP

(0606.Draft Clair Maltby Secondary Plan comments.pdf)

cc: Stacey Laughlin, City of Guelph

Attachments: SV Law and NRSI