

August 16 2021

VIA EMAIL ONLY (clerks@guelph.ca)

City of Guelph
1 Carden Street
Guelph, ON N1H 3A1
Attention: Mayor Guthrie and Members of Council

**Re: Clair-Maltby Draft Secondary Plan, CEIS and MESP
Draft For Community Engagement**

Dear Mayor Guthrie and Members of Council,

We attended the series of virtual public information sessions on June 24th for Clair-Maltby. Thomasfield Homes owns land within the Clair-Maltby Secondary Plan area (99 Maltby Road and 2054 Gordon Street). We have reviewed the draft secondary plan and supporting documents (CEIS and MESP) and would like to offer our comments found below. We hope that Staff will consider these comments as they move forward in the Secondary Plan process.

We understand that a Fiscal Impact Assessment is yet to be released for review and comment and as such, we may have additional comments when that document becomes available.

Comments:

- 1) *Section 11.3.1.2 Principle 1 Objective 3:* Halls Pond is specifically identified with respect to the maintenance of biodiversity and ecosystem health in Clair-Maltby; why is Hall's pond specifically mentioned in this context? There are many other Provincially Significant Wetlands and natural areas within Clair-Maltby that contribute to the overall ecosystem health of the area.
- 2) *Section 11.3.1.2 Principle 1 Objective 4:* This objective promotes the use of green infrastructure to complement traditional infrastructure used to manage stormwater; the City should allow green infrastructure to be counted toward stormwater management calculations to incentivize its use.
- 3) *Section 11.3.1.2 Principle 1 Objective 6:* This objective seeks to minimize changes to the hummocky topography of the Paris Galt Moraine; the City must recognize there is likely to be considerable construction challenges with respect to infrastructure and that conflicts may arise between meeting this objective and current City engineering and accessibility standards.
- 4) *Section 11.3.1.2 Principle 4 Objective 1:* A modified street grid pattern and trail system that seeks to create an interconnected and interwoven area will be challenging to accomplish. This objective

was not achieved on the lands east of Gordon Street. The lands east of Gordon Street are poorly interconnected, and will encourage traffic onto Gordon Street. Additionally, the proposed moraine ribbon which follows the periphery of the Natural Heritage System, stormponds, etc meanders and does not support point to point efficient travel.

- 5) *Section 11.3.2.1.2 "Managing Growth in Clair-Maltby"*: This section suggests Clair-Maltby meet a minimum density target not less than 65 residents and jobs per hectare. This density will not allow for a range of housing types, which will further fuel the current housing crisis by not addressing market demand. Current planning policy has contributed to the affordability crisis by restricting the supply of ground-oriented housing that the market demands. The Clair-Maltby area density target should be revised to achieve the density objectives of Places to Grow which is a minimum of 50 residents and jobs per hectare. The City has an opportunity through planning policy to help address the housing supply imbalance in Guelph and ensure the quality of life our City offers continues into the future.
- 6) *Section 11.3.2.2.2 "Open Space System"*: The moraine ribbon has no technical basis, serves no function and landowners must be compensated for this land taking.
- 7) *Section 11.3.3.2.8 "Significant Wetland"*: states that where development is proposed adjacent to Hall's Pond, a full bathymetric survey is required – will all abutting land owners be required to complete the survey? The community park will be adjacent to Hall's Pond, will the City be responsible for the bathymetric survey?
- 8) *Section 11.3.3.2.1 "Halls Pond"*: The management plan for Hall's Pond should be paid for and prepared by the City and any works be a capital works project by the City, given that the purpose of the Management Plan is to "*establish appropriate access, recreational use, and restoration*". This should be done in conjunction with the City's recreational programming for the Community Park.
- 9) *Section 11.3.6.4 "Road Network"*: The current configuration on the Springfield lands with the road, community park, and stormwater management as shown, is poor as it create a very long stretch of single loaded road – will the City pay for half of the single loaded road?
- 10) *Section 11.3.7.2 "Community Park"*: The Clair-Maltby area is already in proximity to Larry Pearson Community Park, which is adequate to serve the needs of future residents of Clair-Maltby. The proposed location of the Community Park is poor planning. In fact, the March 2, 2020 report to Committee of the Whole (IDE 2020-17) Planning staff did not recommend its current location. Committee of the Whole made a decision, not based on the recommendation of Planning Staff and voted to move the park location.

Access to the Community Park will be down a local residential street, through a residential subdivision, not a collector road as required by the Official Plan. Further, this proposed location of the Community Park will be unable to meet the objective of access by multiple modes of

transportation; it is in an isolated location, surrounded by natural heritage features to the north, south and east which further limit and restrict access. There will be no internal north-south road connection on the east side of Gordon Street, all vehicular and public transit access will need to be directed to Gordon Street, which is over half a kilometer away from the park and the majority of the land use within the 400 m radius surrounding the community park are designated as NHS/non-residential uses.

- 11) *Section 11.3.7.2 "Community Park"*: It is Thomasfield's expectation that the Community Park will be purchased by the City at fair market value based on a residential use.
- 12) *Section 11.3.7.3.3 "Neighbourhood Parks"*: If the moraine ribbon, which has no technical basis, is to be included within the secondary plan, it must be counted toward parkland dedication.
- 13) *Section 11.3.7.4.1 "Moraine Ribbon"*: The use of "moraine ribbon" is misleading terminology as it has no actual connection to the moraine. It does not follow moraine features it is a meandering trail that does not achieve meaningful connectivity, it does not follow active transportation routes. The moraine ribbon is not required as a buffer to the NHS as buffers are already included within the mapped NHS. The moraine ribbon is an unnecessary feature to the Clair-Maltby lands. The moraine ribbon is a land taking with no Planning Act basis and landowners must be compensated; it needs to be included within the parkland dedication requirements.
- 14) *Section 11.3.9.2.3 "Design Review"*: A design review committee is not necessary for the Clair-Maltby area. The City already has urban design guidelines and the staff expertise to review development applications; if needed in the odd circumstance, a peer review consultant is a better solution.
- 15) *Section 11.3.9.2.4 "Design Review"*: Architectural controls are not needed when the City already has urban design guidelines and the staff expertise to review development applications.
- 16) *Section 11.3.9.4.3 "Phasing and Finance"*: This proposed policy states that "*development within the Secondary Plan area shall only be permitted to proceed when a significant number of landowners in the Secondary Plan area have entered into a cost sharing agreement or agreements amongst themselves to address the distribution of costs associated with development in a fair and equitable manner*". Clarification is needed as to how the City intends to impose this upon landowners and how it would work. The phasing and timing of development as currently proposed is not viable and will be extremely challenging within Clair-Maltby; agreements will be very cumbersome and complicated with the number of landowners and parties involved. If developers are required to upfront costs, it is only reasonable that they will expect to proceed in a timely manner to recoup their investment. It also needs to be determined how costs will be shared and based on what metrics, ie. acreage? density?

Each property within Clair-Maltby should have servicing options available in order to advance development. To expect that landowners to upfront costs and have no means of recovering costs for years is not realistic.

The MESP for Clair-Maltby suggests that infrastructure run up Gordon Street and along Clair Road. This proposal will cause immense disruption to the City, with Gordon Street, one of Guelph's three major north-south routes under significant construction. Servicing options that consider infrastructure routes off Gordon Street and through raw land should be considered. Such servicing options may be less expensive, less complicated and create less disruption for the City, while also providing landowners options.

The MESP identifies a pumping station internal to the Springfield lands, we question the practicality of placing a pumping station in the middle of the property, far away from the servicing corridor along Gordon Street. Pumping stations should be located close to the servicing corridor; as proposed it makes the ability to service other lands via the pumping station contingent on the development of Springfield, which is not intended to be developed within the current Phasing timeline proposed in the Secondary Plan

- 17) *Section 11.3.9.4.3 "Phasing and Finance"*: Springfield Golf Course is identified within one of the earlier phases of the proposed phasing plan (Phase 2); at present the intent is that Springfield Golf Course will continue operations beyond the proposed phasing time frame.

As a landowner within the Clair-Maltby Secondary Plan area, we would welcome an opportunity to engage with Staff and discuss these comments.

We thank you for your consideration of our comments and should you have any questions or wish to discuss further please do not hesitate to contact us.

Thank you,



Katherine McLaughlin

cc. Stacey Laughlin, Senior Policy Planner (stacey.laughlin@guelph.ca)