



August 31, 2021

Project No. 0709

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

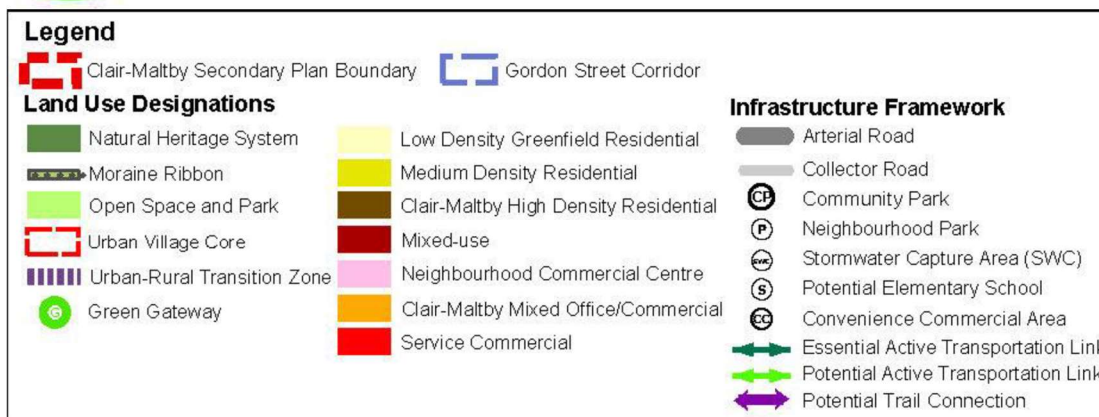
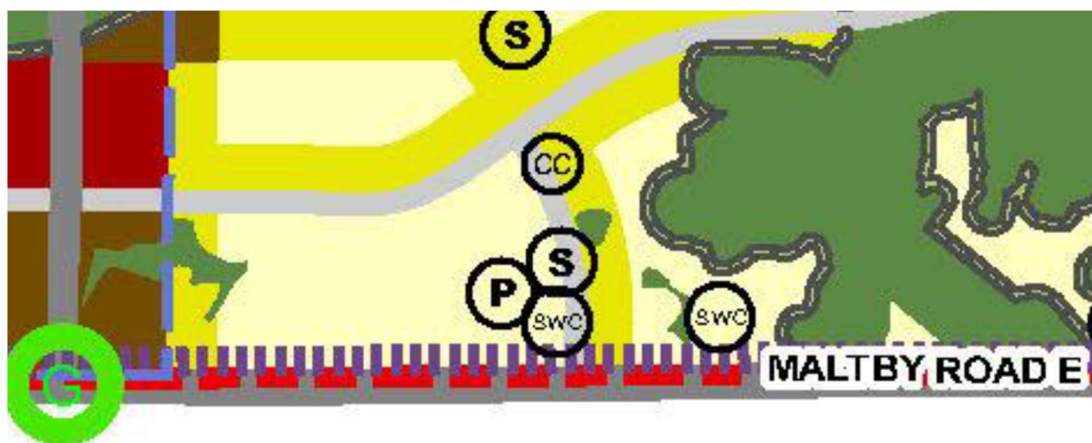
Attention: Mayor Cam Guthrie and Members of Council

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 1077955 Ontario Inc., the owners of 2270 Gordon Street, a 32.6 hectare property located within the Clair-Maltby Secondary Plan area at the north east intersection of Gordon Street and Maltby Road.

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 letter from the owners' solicitor the Draft Secondary Plan mapping is not consistent with the **OPA No. 42 settlement mapping**. The newly identified and proposed Natural Heritage System designations located in proximity to Gordon Street, the new isolated areas, the Green Gateway and the Moraine Ribbon are land takings beyond the designations within the agreed to minutes of settlement. The owners are requesting that the Clair-Maltby mapping and policies be revised to be consistent with the minutes of settlement.

Included as an attachment to this letter is a memo prepared by **Natural Resource Solutions Inc.** providing environmental comments related to the Draft Secondary Plan.

With respect to the newly identified and proposed **Natural Heritage System overlay/designation** located in proximity to Gordon Street, it is my understanding that none of the required work has been completed by the City or the City's consulting team in compliance with the Ministry of Environment, Conservation and Parks requirements to justify the inclusion of this new designation. There is no technical basis for the inclusion of this area within the Natural Heritage System designation.

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.

There are many questions related to the **Green Gateway** indicated on the subject property. The secondary plan policies should clearly include the Green Gateway as publicly owned land to be included in the City's required parkland dedication. Alternatively, the Green Gateway features may be included within the municipal road allowance.

The **Mixed-use land use designation** should clearly permit mixed-use buildings, freestanding commercial buildings and freestanding multi-residential buildings consistent with the current Official Plan policies. All permitted uses within this designation should not be prescribed as mixed-use buildings.

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. 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.

The **Urban-Rural Transition Zone** is identified on the subject property. The policies related to Urban-Rural Transition Zone overlap with Medium and High Density residential designations with minimum density requirements that do not correspond with the proposed maximum 3 storey building height.

The draft secondary plan policies permit an institutional use or **Convenience Commercial Area** at intersections to provide a community focal point. Rather than map the Convenience Commercial Area on the plan, the policies should permit convenience commercial uses within residential designations as per the current Guelph Official Plan policies.

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,



Astrid Clos, MCIP, RPP

(0709.Draft Clair Maltby Secondary Plan comments.pdf)

cc: Stacey Laughlin, MCIP, RPP, Senior Policy Planner, Planning and Building Services  
Infrastructure, Development and Enterprise Services

Attachments: Arnold Foster and NRSI