

Attachment-4 Summary of Key Comments, Staff Responses and Revisions

The following includes staff responses and highlights key revisions to key or repeated comments received on the draft documents. A full chart of all comments as well as staff responses are provided separately in Attachment-6.

Key Issues and Revisions

Land Use Designation

Mix of Housing and Density

Summary of Comments / Key Issues

Staff have received requests for both higher and lower density land use designations on specific properties across the secondary plan area, including within the Gordon Street corridor.

Staff Response

Staff have reviewed and made adjustments to densities and allowable building heights throughout the process while still maintaining the intent of the overall community structure. The proposed land use designations allow for a full range and mix of housing types to plan for a vibrant, urban community that assists the City in meeting the population and density targets set out in A Place to Grow.

Gordon Street Corridor

Summary of Comments / Key Issues

Many comments were received with respect to the Gordon Street corridor. Some comments requested that the permitted height and density be increased, while other comments raised concerns that the corridor was too dense.

Staff Response

The overall structure for the secondary plan does propose to concentrate high density residential and mixed use within the Gordon Street corridor. This concentration assists with supporting higher frequency transit to be provided on Gordon Street. Further, it also allows the opportunity to transition between high density residential and low density residential and provide opportunities for a full range and mix of housing within the secondary plan area. The inclusion of this corridor with a mix of high-density residential and mixed use land use designation supports the identification of a Strategic Growth Area to assist in meeting the City's population and density targets. Strategic Growth Areas are planned for a mix of uses and transit supportive densities and allow for the co-location of services to support the creation of hubs (or in this case a main street area/urban village core) within the community.

The NHS, together with the designated cultural heritage landscape, create natural 'breaks' in the proposed development and density. Further, the permitted building heights within the corridor concentrate the tallest buildings close to the urban village core and an urban-rural transition area is proposed along Maltby Road within the corridor to ensure an appropriate transition to the rural area south of the City (see Schedule D of the Secondary Plan). Renderings of the Gordon Street corridor are included as Attachment-5 to this report.

The overall structure for the secondary plan also allows for 'gentle density' throughout the area by including the Medium Density Residential designation along many of the proposed collector roads. This structure will assist in supporting transit routes along collector roads, allowing for a full range and mix of housing and providing transition between designations.

Urban-Rural Transition Area

Summary of Comments / Key Issues

Staff have received comments requesting that the urban-rural transition area policies be more restrictive (i.e. require large landscaped setbacks in addition to the current policy requirements) and comments indicating that the urban-rural transition area is not required or should be less restrictive. Comments have also been received outlining that there is a conflict between the underlying land use designations and the urban-rural transition area policies in that minimum density included in the land use designations may not be achievable with the maximum 3 storey height restriction.

Staff Response

The Urban-Rural Transition Area is an overlay designation. Building height is limited to a maximum of 3 storeys for those portions of the property that are within 60m of the northerly side of the Maltby Road right-of-way and the westerly side of the Victoria Road right-of-way. Beyond this area, buildings can transition to the maximum height permitted by the underlying land use designation which creates the opportunity for the minimum permitted density to be achieved.

The Height and Density policies of the Clair-Maltby High Density Residential designation make an exception to the minimum building height to allow for the 3 storey building height to be achieved within the Urban-Rural Transition Area.

Open Space System – Moraine Ribbon, Parks

Summary of Comments / Key Issues

The comments received outline that it was unclear whether the Moraine Ribbon is part of the Natural Heritage System as additional buffer or if it is part of the Open Space System. Concerns were also raised with respect to whether the Moraine Ribbon is needed as it does not serve an ecological function related to the NHS. If the Moraine Ribbon is needed, then compensation should be provided to landowners for this land.

Staff Response

The moraine ribbon is part of the Open Space System for the secondary plan area and will be considered as a park except in locations where it forms part of a right-of-way, active transportation corridor or a stormwater capture area. Accordingly, the City will consider the use of a variety of strategies, tools and options to assist with the cost of acquiring parkland and open space, including the Moraine Ribbon, in Clair-Maltby. These strategies include: municipal land purchase; parkland dedication; community benefit charge strategy; municipal lease; partnership/joint provision of parkland with local partners (GRCA, school boards); easements; and, donation/bequest at the discretion of the City.

The estimated population of the Clair-Maltby Secondary Plan area is 16,300. Planning for additional park space, such as the Moraine Ribbon (a linear park) to

serve the future residents is appropriate and supported based on the Open Space System policies of the City's Official Plan.

Summary of Comments / Key Issues

Some of the comments received indicated that a Community Park within Clair-Maltby is not necessary as it is already close enough to the South End Community Park, which is adequate to serve the needs of future Clair-Maltby residents.

Some comments also highlighted that the approved location for the Community Park is challenging with respect to access and proximity to residential uses.

Staff Response

The estimated population of the Clair-Maltby Secondary Plan area 16,300. Planning for another Community Park to serve the future residents is appropriate and supported based on the Open Space System policies of the City's Official Plan.

The City understands that the amount of parkland that is being planned for within the secondary plan area is more than can be acquired through parkland dedication. Accordingly, it is the City's assumption that parkland above the amount that will be dedicated in accordance with the parkland dedication by-law will have to be acquired by the City in another manner, which includes the purchase of lands by the municipality among other tools and strategies.

The community park is to be located on a proposed collector road which will be served by transit. Further, the proposed north/south active transportation route connects to the Community Park location. With these connections, appropriate access to the Community Park is provided.

Master Plan Approach

Summary of Comments / Key Issues

The MESP is too prescriptive and does not allow for flexibility. Property owners should have the opportunity to consider alternative servicing strategies, including multiple sanitary outlets. The study should have considered existing property boundaries when determining servicing strategies and phasing.

Staff Response

The MESP was prepared in accordance with Approach #4 of the Class EA for master plans – which indicates an integrated approach with the planning act. At a minimum, this plan as well as the consultation throughout the process, has fulfilled Phases 1 and 2 of the EA process. It has allowed the City to comprehensively identify needs across the entire Secondary Plan Area (SPA), and study alternatives from the lens of the SPA as a whole.

The MESP and associated background documents are intended to be the framework for future, plans of subdivisions within the SPA. The work that occurs at the plan of subdivision stage will be further informed and can confirm or adjust assumptions made at the MESP stage. At that future stage, there is flexibility for modifications to the MESP plans provided that the original intent is still met. For example, for the SWCAs, the MESP establishes the sizing and location based on land use and grading assumptions, but there is flexibility in the exact size and location.

Phasing

Summary of Comments / Key Issues

Feedback included several requests to adjust the presented phasing; move land parcels to earlier phases and accelerate capital projects to support phases prior to Phase 1 implementation (i.e. prior to 2025).

Staff Response

All of the required infrastructure required to support Clair-Maltby's planned 2051 population cannot reasonably be built at the project onset. As such, phasing for the development was presented in a logical manner from north to south, largely governed by wastewater catchments. The City cannot accommodate individual requests to be moved into earlier phases due to the cascading effect on downstream infrastructure requirements, but is open to collective phasing presented by the Landowner Group, formed prior to approval of development applications as required in policy.

The City also acknowledges that some landowners may not wish to develop as early as the phase they see their land in, or at all. There may be a need for servicing agreements and easements to facilitate the construction of water, wastewater, and stormwater management features that are required for other parts of the SPA to function. These are discussions and negotiations that will occur in the future, and cannot reasonably be captured in the MESP as there are many variables that could change over the 10, 15, 20 year horizon. However, based on specific timeline feedback from stakeholders, the location of SPS 3 has been revised.

Minor modifications to policy language were made in an effort to allow flexibility with respect to phasing.

Development Implementation - Landowner Group

Summary of Comments / Key Issues

Based on similar-scale developments in neighbouring municipalities, staff have included language in OPA 79 requiring all landowners in the CMSP area to form a group and establish equitable cost-sharing agreements amongst themselves, prior to any development application being approved. Feedback from stakeholders expressed concern regarding the language included in the policies and requested further detail on how the policies, including the requirement for the Landowner Group, would be imposed

Staff Response

Staff have not removed this policy as it is crucial to the cohesive and logical implementation of services and lands in the SPA.

In response to queries of how the City will impose this policy, the City will likely have the requirements captured in the condition of draft plan approval and may include using a Holding Provision through the Zoning by-law.

Funding / Financing

Summary of Comments / Key Issues

A number of comments were received regarding the cost of the infrastructure and services required to support the Clair-Maltby Secondary Plan. Concerns were expressed related to "cost-overstatements" for larger infrastructure and D.C. debt financing. Additionally, comments included concern about how the City would pay

for Clair-Maltby given the existing asset management requirements as well as growth in other areas of the City.

Staff Response

As per the FIA, the Clair-Maltby Secondary Plan area should generate sufficient growth tax and rate revenues over the long-term to fund the operating and capital investment. That the timing of these costs and revenues are not ideally matched particularly in the early years and will likely mean up to a one per cent tax increase overall to account for this.

The City intends on incorporating the financial analyses for Clair Maltby into the Capital budget process, along with all of the other growth priorities. Further, a DC study is being undertaken in 2023 which will look at all of the masterplans and studies to aide in sustainable timing of growth-related infrastructure.

Further discussion of the Fiscal Impact Assessment and financing implications is presented later in this report.

Proposed Stormwater Management Strategy

Summary of Comments / Key Issues

Comments were submitted requesting that the stormwater management strategy be revised due to the size (and land consumption) of the Stormwater Capture Areas (SWCAs). Comments requested the 20mm capture be changed to pre-to-post water balance. Requests were made to consider traditional stormwater management strategies in lieu of the proposed strategy. As well, the precipitation data used to generate the stormwater management strategy was challenged.

Staff Response

The EA studied several alternatives, and the hybrid alternative of SWM Capture areas and distributed source controls was selected as the preferred strategy. SWCA sizing and siting is in alignment with traditional stormwater management which prescribes a pond per drainage area. The SWCAs were placed considering grading, mimicking existing function, as well as co-location principles. The placements and sizing are based on assumptions and conceptual topographical data. Exact placement and sizing will be determined through Draft Plan of Subdivision applications and supporting documents. A technical meeting was held with landowners to discuss the strategy and reiterate that there is flexibility in the exact location and size as they are dependent on specific land use and topography inputs.

Additionally, the stormwater management strategy was tested against the higher precipitation data set and found to function as intended, meaning the strategy is appropriate against a range of future climate data.

Increased Salt Loading & Groundwater Protection

Summary of Comments / Key Issues

Concern was raised regarding increased salt loading due to increased imperviousness and the stormwater management strategy to capture and infiltrate all runoff. Comments were received from neighbouring regions as well as local stakeholders.

Staff Response

Water services staff were consulted throughout the project, and have the following response to address salt concerns with respect to drinking water quality.

Our drinking water is protected – City of Guelph municipal wells are not highly linked to the Clair-Maltby Secondary Plan area. Municipal wells are completed in a deep regional aquifer situated beneath an aquitard, which serves to further protect our drinking water. This hydrogeologic setting limits any groundwater transport pathways from the Clair-Maltby Secondary Plan area to our drinking water and mitigates movement of contaminants into wells.

Neighbouring wells are protected – Local domestic drinking water supplies near the Clair-Maltby Secondary Plan have a limited capture zone since the pumping rates are relatively low and likely do not extend beyond their respective property boundary. As such, we do not expect to see impacts to the water quality of domestic wells near the Clair-Maltby Secondary Plan area. MECP recently released a [guidance document](#) with several best management practices for private well owners to ensure the drinking water from their well is maintained from a quality and quantity perspective.

City of Guelph is proactively managing road salt – The City of Guelph is taking measures to improve road salting practices, including upgrading equipment and hardware for our snow plows and salting vehicles, enhancing our water quality monitoring program and initiating our Salt Management Action Plan (SMAP) to enhance community awareness and encourage best management practices.

Proposed Water and Wastewater Servicing Strategy

Summary of Comments / Key Issues

Comments were submitted requesting modifications to the water and wastewater servicing solutions. Wastewater concerns included the location of Sanitary Pump Station 3 (SPS3) and flexibility and redundancy concerns related to in-line pumping in the preferred alternative. Several requests to look at additional alternatives or modifications to the existing alternatives were made. Water comments included requests to move the water tower to a different location and concerns related to phasing of the water tower; in the draft MESP it was included in Phase 3 but there were concerns from the Technical Working Group and Water Services related to Phases 1 and 2 relying on existing Zone 1 storage.

Staff Response

Subsequent to receiving feedback at the Statutory Public Meeting, the City met with the Technical Advisory Group as well as all property owners to discuss the water and wastewater servicing concerns. The following amendments have been made to the final MESP.

- Sanitary Pump Station 3 has been relocated to an alternative low point within Phase 2.
- Two new wastewater servicing alternatives were established and circulated for feedback. The final preferred alternative is the Gordon / Southgate Hanlon, which eliminates the in-line pumping concern and had higher-scoring cost, access, and maintenance efficiencies when compared to the other alternatives. It also offers the most flexibility for development phasing and contains all infrastructure within the road right-of-way.

- The elevated water storage remains in the same location, but is included in Phase 2, mitigating concerns about water pressure and fire storage for Phase 1 and 2 growth. To provide redundancy for Phase 1 (fire flow availability and domestic pressures), a temporary in-line booster pump will be installed in the water network.

Natural Heritage System

Several comments were submitted regarding the Natural Heritage System (NHS) policies for Clair-Maltby.

Official Plan Amendment 42 Settlements - Summary of Comments / Key Issues

Concerns were raised by several landowners that Official Plan Amendment (OPA) 42 settlement agreements were not being respected through the proposed refinements of the NHS.

Staff Response

The approach taken to NHS mapping refinements was to respect agreements made related to the interpretation of the applicable OPA 42 policies through the Ontario Municipal Board process, while identifying refinements to the NHS (where appropriate), based on new information collected as part of the Clair-Maltby Secondary Plan Comprehensive Environmental Impact Study (CEIS) process, such as Significant Wildlife Habitat (SWH).

Staff re-examined NHS mapping to confirm that proposed refinements were in keeping with the identified approach. Re-examination of NHS mapping identified a few minor refinements that were identified due to an erroneous artefact of the map layering process. These errors have been corrected in both the CEIS and Secondary Plan NHS mapping.

Mapping of Candidate Significant Wildlife Habitat

Summary of Comments / Key Issues

Concerns were raised by several landowners about mapping Candidate SWH as Natural Areas Overlay on Schedule E of the Secondary Plan.

Staff Response

The Natural Areas Overlay is applied to lands where there is a need for more detailed assessment at the time of site-specific development. Candidate SWH was not included in the OPA or CMSP Land Use Schedule as a Natural Areas Overlay in accordance with the guidance in the Natural Heritage Reference Manual. It was, however, mapped on Schedule E in the draft secondary plan to ensure that the need for detailed assessment was identified.

Based on further consideration, Candidate SWH mapping has been removed from Schedule E to avoid confusion. A note referring to the CEIS SWH mapping has been retained on Schedule E and a new Appendix has been added to the Secondary Plan that shows all known Candidate SWH for reference.

Headwater Drainage Features

Summary of Comments / Key Issues

Concerns were raised by several landowners about the implications of mapping “Potential” and “Confirmed” Headwater Drainage Features (HDF) on Schedule E and requirements for protection through site-specific development.

Staff Response

The primary objective of including HDFs in the Secondary Plan is to ensure that they are assessed, their hydrologic contributions to the NHS are recognized, and that these contributions are maintained in the post-development landscape, where appropriate.

Based on further consideration, HDF features have been relabeled “Potential HDFs – field verification required” or “Potential HDFs – detailed field assessment required” with site-specific assessment required for both. Relevant policies in the Secondary Plan have been clarified, HDF mapping has been removed from Schedule E. A note referring to the CEIS Potential HDF mapping has been retained on Schedule E and a new Appendix has been added to the Secondary Plan that shows all known Potential HDFs for reference.

Halls Pond Management Plan

Summary of Comments / Key Issues

Concerns were raised by several landowners about who would be responsible for preparing the management plan identified in Secondary Plan policy and how timing of the management plan may affect timing of development in catchments draining to the Halls Pond Provincially Significant Wetland Complex.

Staff Response

The Halls Pond lands management plan policy has been clarified to identify that the Landowner Group will be required to prepare the lands management plan. The management plan will be completed in accordance with an approved Terms of Reference prior to development occurring within catchments draining to the Halls Pond Provincially Significant Wetland Complex. Development applications will be required to implement the recommendations of the management plan through site-specific Environmental Impact Studies and Environmental Implementation Reports.

Natural Heritage System Crossings of Essential Transportation

Summary of Comments / Key Issues

Concerns were raised by several landowners about the alignment of Street D and the need for flexibility in the Significant Landform policies to accommodate infrastructure and development.

Staff Response

The alignment of Street D was reviewed, and it was confirmed that adjustments were not possible due to feature-specific NHS policies prohibiting essential transportation infrastructure within some Significant Natural Areas and Natural Areas and/or their buffers. The alignment of Street D reflects where essential transportation infrastructure is permitted. Secondary Plan policies build on the Significant Landform policies of the Official Plan by reinforcing the need for balance between protection and development, and by providing supplemental guidance on how balance can be achieved. It is understood that meeting the supplemental

guidance provided in policy may be challenging in the more hummocky areas of Clair-Maltby. For this reason, “to the extent feasible” is included in these policies.

Mobility Network

Several comments were submitted regarding the Mobility Network, as shown on Schedule C.

[Street C/D](#)

Summary of Comments / Key Issues

Requests were made to remove one of the two east-west collector roads from the central part of the SPA. Concerns raised included the single-loaded nature of the roads, and third-party modelling was completed to suggest that one collector road at that location would be sufficient to support traffic.

Staff Response:

The introduction of two east-west oriented collector streets in the central portion of the Secondary Plan area supports the plan’s transportation objectives of creating a fine-grain, robust street network to support active transportation modes and transit service provision. The network is intended to provide frequent routing opportunities for all road users, and redundancy in the road network to accommodate the planned high-density node. Key in this regard is providing a modified grid of collector streets that allow for frequent occurrence of active transportation infrastructure connecting to key destinations within the high-density node.

The inclusion of two collector streets within the central node, as proposed, results in reduced vehicle delay. It also provides additional opportunities for emergency vehicle access and provides opportunities for local transit routing and servicing as well as for additional connectivity for active transportation users.

No changes to the Mobility Schedule or policy were made based on this issue.

[Street G](#)

Summary of Comments / Key Issues

Comments expressed concern with the collector road shown perpendicular to existing Rolling Hills property, and it was requested to be removed.

Staff Response

After consideration and consultation of the wider City growth strategy and Transportation Master Plan, staff determined that it was appropriate to reassign the road alignment at this location as a local road, and it has therefore been removed from Schedule C. The mobility policies have been revised to include the requirement of a local road connection in this location.

Gordon Street Multi-Use Overpass

Summary of Comments / Key Issues

Several comments suggested that the Gordon Street Multi-Use Overpass is not required and requested that it be removed or that an at-grade crossing should be considered. The City also received several correspondence items in support of the multi-use overpass.

Staff Response

The Gordon Street multi-use connection has been included in the Secondary Plan to contribute to the active-transportation focused, connected, healthy, and environmentally friendly vision of the SPA. The language in the OPA has been modified to refer to this as the Gordon Street multi-use connection (overpass, underpass, or other), and policy clearly states the requirement for the feasibility to be studied as part of the subsequent Gordon Street EA.

Future EA Requirements

Summary of Comments / Key Issues

Comments included calls for future study of Gordon Street. Recently, delegation at Puslinch council requested that the remainder of the Gordon Street EA for Clair-Maltby be combined with the length of Gordon Street from Maltby and heading south – a joint EA across municipal boundaries.

Staff Response

Gordon Street, along with some of the other collector streets, will require further study under the MCEA process as they are classified as Schedule C projects. This means that, building off of Phases 1 and 2 as completed in the MESP, the City will look at completing Phases 3 and 4 (design solutions for the preferred alternative, and preparation of the Environmental Impact Report) prior to detailed design and construction (Phase 5). City staff met with County staff to start early conversations about a future joint EA. At this time, staff do not anticipate proceeding with a joint study, primarily due to timing and scope alignment challenges; however, this concept will be revisited closer to the time of initiating the Schedule C EA.

Traffic Concerns from our Neighbours

Summary of Comments / Key Issues

Puslinch Township Council continued to express their concerns with the traffic that will be generated and funneled south through Aberfoyle with the widening of Gordon Street, and the impacts that this will have on the Township's infrastructure.

Staff Response

The vision and policy for Gordon Street is to control access and entrances by feeding local streets first to the collector network, prior to connecting to Gordon Street. The Ministry of Transportation Ontario is planning to complete the "[Midblock Interchange](#)" project in the coming years which will provide southbound routing from Clair-Maltby, along Maltby, and to the 401. Additionally, the recently approved Transportation Master Plan also identifies Gordon Street as a future Quality Transit Network (conversion of one lane to dedicated transit), confirming that road design at four lanes serves future multi-modal needs.