



May 12, 2022

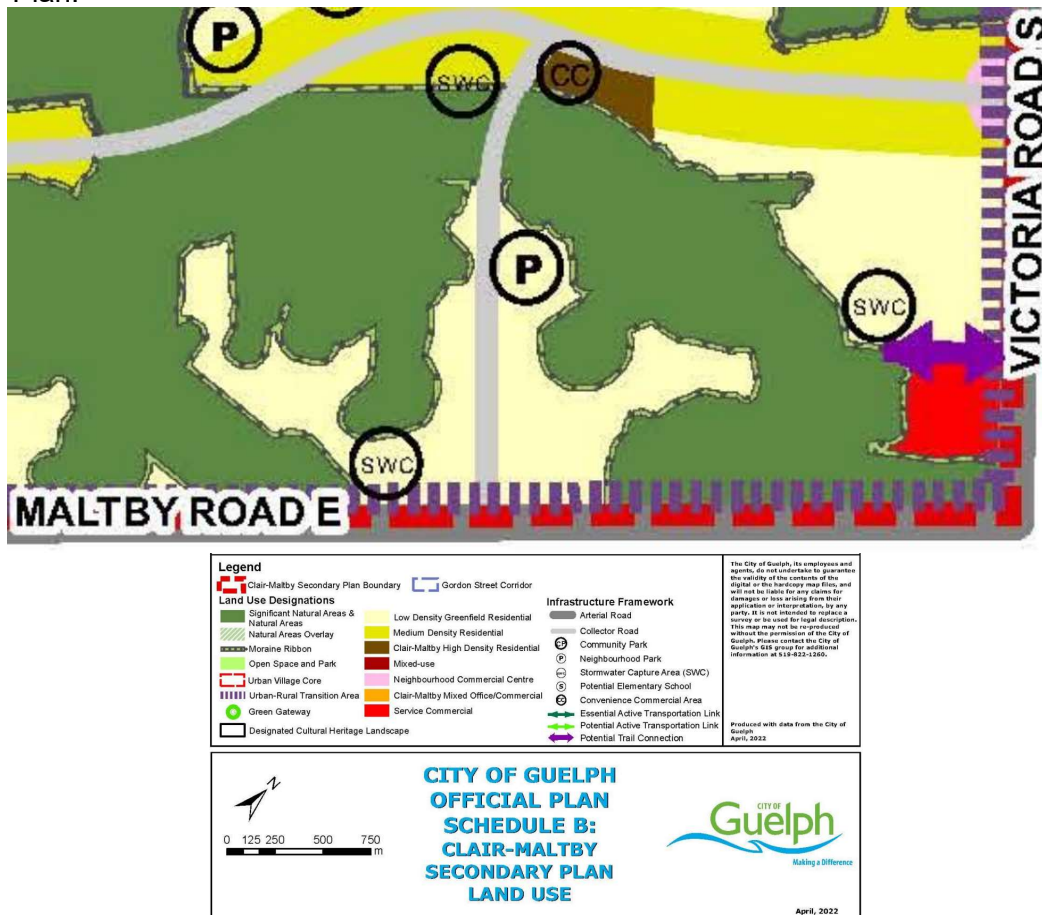
Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Provided via email only to clerks@guelph.ca

Attention: Mayor Cam Guthrie and Members of Council

Re: **Maltby Road Council Decision Meeting May 16, 2022**
Clair-Maltby Master Environmental Servicing Plan and
Secondary Plan Official Plan Amendment (OPA No. 79)

I am the planning consultant providing these comments on behalf of Timberworks Custom Homes Inc. the owner of 344 and 376 Maltby Road East located in the southeast portion of the Clair-Maltby Secondary Plan.



With respect to the **moraine ribbon** shown in the 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 current Official Plan designation, nor is it clearly parkland dedication in the 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.

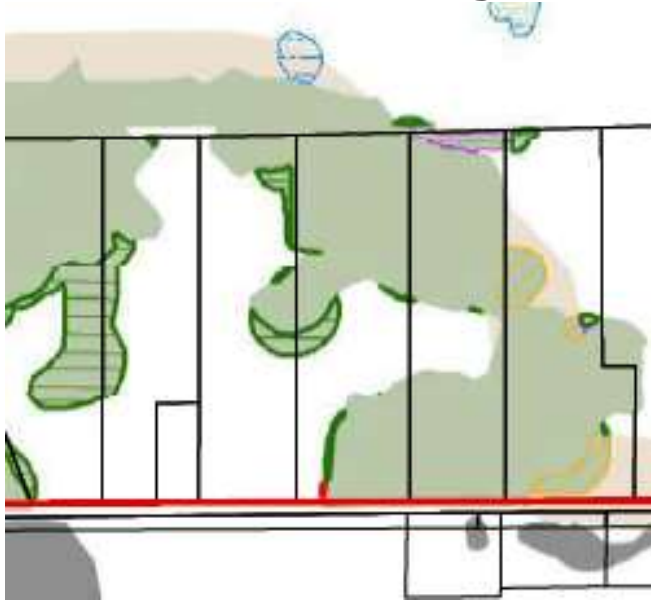
The need for the proposed north south **collector road** which no longer proceeds north through the Rolling Hills neighbourhood (now removed from the Clair-Maltby Secondary Plan Area) is questioned. A collector road is not required in this location since it will not connect Clair Road and Maltby Road. A local road is more appropriate in this location.

The Clair-Maltby Secondary Plan and policies have identified the objective of locating **Neighbourhood Parks** next to Stormwater Capture Areas. This has been consistently applied with the exception of this location. This portion of the Clair-Maltby Secondary Plan is a small isolated area which would not contribute adequate residential development to create the need for a Neighbourhood Park. Given the configuration of the natural heritage system in this area much of the land proposed to be designated as Low Density Greenfield Residential will be challenging to access and service to provide housing. The proposed Urban-Rural Transition Zone along Maltby Road further reduces the potential to provide housing within this area. A Neighbourhood Park should, therefore, not be identified within this area.

The **Urban-Rural Transition Zone** which proposes to restrict building heights to 3 storeys should be considered in the context of the land use designations within the abutting Township of Puslinch. Where there are Recreational Lands (golf course) or Greenlands and Core Greenlands designations within the Township of Puslinch, the Urban-Rural Transition should not be required. This will provide opportunities for higher residential densities to be designated abutting Maltby Road and Victoria Road South within the Clair-Maltby Secondary Plan.

Landowners were advised by the City that OPA No. 42 needed to be completed prior to the Clair-Maltby Secondary Plan to ensure that the natural heritage system was in place prior to the secondary plan process commencing. The **Comprehensive Environmental Impact Study** for the Clair-Maltby Secondary Plan (see excerpt provided below) now proposes to include additional Significant Natural Areas. I understand that the technical work required has not been completed to justify the inclusion of these new lands into the natural heritage system. These new "Natural Heritage System Refinements" additions should be removed from the Clair-Maltby Secondary Plan mapping and instead the future Environmental Impact Studies prepared in support of the future planning application should evaluate these areas.

Comprehensive Environmental Impact Study Phase 3 Impact Assessment and Management Plan - Map NH-14B



Natural Heritage System Refinements
Significant Natural Areas Additions

As documented in meetings, emails and letters to City staff and Council prior to Council making a decision, we continue to have planning objections to OPA No. 79 related to the proposed Moraine Ribbon, servicing options, phasing and servicing policies of the MESP and the Comprehensive Environmental Impact Study particularly respecting the OPA No. 42 Settlement Agreement and other matters for these properties.

These lands were annexed into the City of Guelph in 1993 and the landowners are pleased to see that OPA No. 79 is now before Council for a decision. The owners would have preferred that the requests which have been articulated prior to Council making a decision, had been incorporated into the Clair-Maltby Secondary Plan and MESP.

Thank you for the opportunity to provide these comments. Please provide me with the notice of decision for Official Plan Amendment No. 79.

Yours truly,

Astrid Clos, MCIP, RPP