

Attachment 4: Official Plan Amendment 80 Comment Summary and Response

This table provides responses to comments received during the circulation of the draft OPA 80.

#	Name	Comment	Staff response
1.	MHBC Planning on behalf of Armel Corporation (17/03/2022)	Request to reconsider land use designation change for 240-258 Silvercreek Parkway North to allow for medium and high density residential development.	This site is situated with an employment area and staff continue to support the change to the Service Commercial land use designation to better reflect the existing use of land and for conformity with the employment area policies of A Place to Grow and the Provincial Policy Statement. The properties are adjacent to the Hanlon Expressway and a rail line and industrial uses. Speedvale Avenue West provides a distinct boundary between the Mixed-use Corridor land uses to the south and the industrial uses to the north. To provide for a full range of redevelopment opportunities within the Employment Area, it is recommended that the properties be provided with the permitted uses of both the Service Commercial designation and the Industrial designation. A new policy is recommended.
2.	MHBC Planning on behalf of Armel Corporation (23/03/2022)	Suggest increasing the height of the High Density residential designation in strategic growth areas above 14 storeys. Suggest increasing the height and density for the Medium Density land use designation with strategic growth areas.	Through the growth scenario phase of Shaping Guelph, we heard that 14 storeys would be an appropriate height and there wasn't support for taller heights. We do not recommend increasing the height of the high density residential designation above 14 storeys as of right in strategic growth areas.

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		<p>Recommend that the City modify the Neighbourhood Commercial Centre policies to be more flexible for mixed-use development by allowing residential uses as stand alone uses. Expand the uses within the Service Commercial designations on Wellington Street to include residential.</p> <p>Consider a wider range of uses for the Service Commercial designated lands on Speedvale Avenue West.</p>	<p>No changes are proposed to the medium density designation. In response to this comment, staff reviewed the strategic growth areas and land use designations and feel that the existing height and density remains appropriate. There may be opportunities for site-specific amendments to height and density but overall no changes are recommended in OPA 80. The sites designated medium density have either been recently approved or recently developed. The growth scenarios did not consider additional height and density in these areas and the recommendations of the growth management strategy did not consider changes to the height and density for the medium density land use designation.</p> <p>The commercial policy review (OPA 69) recommended that the neighbourhood commercial centre sites retain their commercial focus. It is appropriate for residential on these sites to be contained within mixed-use buildings. No changes are recommended in response to this comment.</p> <p>The service commercial designated sites were not required to meet the population forecast to 2051. A review of uses within the service commercial land use designation will be considered in a future commercial policy review.</p>
3.	Wellington County (20/04/2022)	Recommendation to revise policy 3.14.2 to prohibit or limit	Policy 3.14.2 has been revised to include "limit".

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		<p>development adjacent to the City's boundary rather than to strictly prohibit.</p> <p>Recommendation to include urban-rural transition policies to achieve an appropriate transition to the rural areas in the County.</p>	<p>Urban-rural transition policies are included in the Clair-Maltby Secondary Plan which is the last undeveloped greenfield area of the City which is adjacent to the rural areas of the County.</p>
4.	MHBC Planning re: 5102 Whitelaw Rd (24/03/2022)	<p>Request to place the property in the Medium Density Residential designation. The changes to the low density residential designation which applies to the property has reduced the height permission for this property from 6 storeys to 4 storeys.</p>	<p>While the changes to the low density designation has reduced maximum height permissions, it has retained the maximum density permissions. Site specific requests to change land use designations outside of the recommendations of the growth management strategy are appropriately addressed through a site-specific development application.</p>
5.	Dr. P. Kraehling (24/03/2022)*	<p>Concern about the mapping of the ecological linkage on Gordon Street north of the Solstice building and that the land use designation could permit a new medium density residential building in the area. Request to designate it as natural heritage system.</p> <p>The concentration of the policies on growth and targets will push development to maximum allowances and will impact the quality of life.</p>	<p>The designation of the property at 1291 Gordon Street has been reviewed and it has been mapped in conformity with Council's approved development of the site. However, given that the common amenity area of the property is not approved for future buildings and is to be retained as amenity space for residents, it is recommended that this area of the site be designated as "open space and parks". This is an appropriate designation for private open space.</p> <p>In terms of growth and targets, the policies of OPA 80 are intended to meet the provincial forecasts and targets while maintaining access</p>

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			to services and amenities and providing housing and jobs to meet the needs of current and future residents. A goal of the Official Plan is to improve quality of life, a change in the way we develop our city from what occurred prior to the introduction of the Growth Plan (i.e., low density detached housing) is needed to achieve this.
6.	Dr. P. Kraehling (30/03/2022)*	Item numbers 51 and 52 of OPA 80 should be reworded to give greater guidance on how new construction will have a low carbon/low energy footprint. The City, through its planning approval process mechanisms, have many opportunities to require developers/builders to institute green building technologies to assist in addressing the climate change emergency.	Further review of the climate change policies will be conducted in the next phase of the Official Plan review following the completion of a sustainable city master plan and climate change adaptation plan.
7.	Blackthorn Development Corp re: 540 York Road (29/03/2022)	Support the existing designation of the property as Commercial Mixed-use and is supportive of the vision for the York Road corridor.	The property was designated Commercial Mixed-use through OPA 69 and no changes are proposed through OPA 80.
8.	Bob Millar (14/04/2022) Beth Finnis (18/04/2022) Sue Smith (3/5/2022)	Concerns about the existing designation of the Armtec site and request to change its designation from High Density Residential. Suggestions include parkland and natural heritage.	The Armtec property was considered through the 2006 Growth Plan conformity work and identified through the City's approved growth management strategy and residential intensification analysis as a prime candidate for intensification. High density residential was recommended and approved as the appropriate land use designation. Council approved this designation, along with designation changes for

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	<p>Katherine Howitt (5/5/2022)</p> <p>Carleen Paterson (10/5/2022)</p>		<p>all other properties identified in the Council approved growth management strategy, through OPA 48 which was adopted by Council in 2012, approved by the Minister in 2013 and approved by the Ontario Municipal Board in 2017.</p> <p>Staff continue to support the existing land use designation of this property. The high density residential designation is appropriate; adjacent properties are designated medium density residential; this site is a brownfield and the designation will help to realize remediation and redevelopment; future redevelopment is subject to zoning regulations for setback and step backs, and the City's urban design policies, guidelines and manuals apply to this site to ensure that redevelopment is appropriate and compatible. It is likely that a zoning amendment application or committee of adjustment application will be needed to allow for redevelopment of this site allowing for public comment on development plans.</p>
9.	<p>MHBC on behalf of Paisley + Whitelaw Inc (14/04/2022)</p>	<p>Request to consider increases to height and density for the Medium Density Residential designation in strategic growth areas. The removal of bonusing policies has decreased the potential permitted density and there is now a significant gap between High Density Residential permissions and</p>	<p>See response in line 2 above.</p>

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		Medium Density permissions in strategic growth areas.	
10.	Mary Mathers and Maureen Van de Ven (2/5/2022)	Request to designate properties in the Rolling Hills area as estate residential.	<p>To address comments received and since servicing is not anticipated to be available in the Serena Lane and Carlaw Place area of Rolling Hills within the time horizon of the Official Plan, staff recommend that the mapping be revised to place the properties on Serena Lane and Carlaw Place into the Rolling Hills Estate Residential designation with an area specific policy as follows:</p> <p><i>Where municipal sewage and municipal water services are extended and are available, the permitted uses and policies of the Low Density Residential designation, Section 9.3.2 of this Plan, shall apply.</i></p> <p>Future extension of servicing would be the responsibility of landowners, this policy would allow for the possibility of servicing should it be feasible.</p> <p>For the Kilkenny Place and Megan Place area of Rolling Hills, outside of the Clair Road frontage which is proposed for medium density residential and mixed-office commercial, the land use designation shall be low density residential and the estate residential designation is recommended to be removed.</p> <p>For properties with frontage on Victoria Road, the Rolling Hills Estate Residential continues to be recommended.</p>

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11.	<p>Jacque Geall and Clay Seabrook (8/5/2022)</p> <p>Michael Watt (18/5/2022)</p> <p>Pete Graham (19/5/2022)</p> <p>Angela and Alex Baggio (20/5/2022)</p> <p>James Nagy (20/5/2022)</p> <p>Ali and Mitra Ashkar (20/5/2022)</p> <p>Mandana and Faz Ashkar (20/5/2022)</p> <p>Steno Carniello (26/5/2022)</p>	<p>Support the recommendations in OPA 80 for the Rolling Hills area; in particular the recommendations for the Kilkenny Place, Megan Place and Clair Road area to include low density residential, medium density residential and commercial mixed-use.</p>	<p>Revisions are proposed to the Rolling Hills area as noted in line 10 and respond to the comments provided.</p>
12.	<p>Malcolm Macintosh (24/2/2022)*</p>	<p>Concern with requirement to comply with provincial planning mandates and that local planning decisions should be the domain of local residents.</p>	<p>The Planning Act and the Places to Grow Act require municipalities to conform with provincial plans and policies. The Shaping Guelph study recommends how to accomplish that in a Guelph specific manner and engagement with</p>

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			the community informed the policy directions contained in OPA 80.
13.	Nick Papadedes (25/2/2022)*	Concerned with the estate residential designation being applied to some properties on Megan Place in Rolling Hills. Would like all properties in the northern part of Rolling Hills to be considered for low density residential rather than estate residential.	Revisions are proposed to the Rolling Hills area as noted in line 10 and respond to this comment.
14.	Stephen Gawron and Janet Nairn (13/02/2022)*	Concerned with potential development of Rolling Hills area. This area is unique and offers newcomers another option in lifestyle.	Revisions are proposed to the Rolling Hills area as noted in line 10.
15.	Mark L. Dorfman on behalf of Families for Rolling Hills (24/02/2022)*	<p>Recommends the following changes to proposed OPA80:</p> <ol style="list-style-type: none"> 1. All of the Rolling Hills subdivision should be designated on Schedule 2 (Land Use Plan) as "Estate Residential". 2. The designations of "Low Density Residential", "Medium Density Residential", and "Mixed Office/Commercial" should be removed from the Land Use Plan and the text policies as they relate to the Rolling Hills Community. 3. Proposed Item 67 should be modified to remove proposed subsection 9.3.6.2 that permits "additional residential units" in the "Rolling Hills Estate Residential" designation. 	<p>Revisions are proposed to the Rolling Hills area as noted in line 10.</p> <p>Additional residential dwelling units are recommended to be permitted as per all other residential areas of the city. This allows for additional units within the house or within a separate structure. Alternative names for additional residential dwelling units are basement apartments, nanny suites, in-law suites, secondary suites. These are appropriate to permit in residential areas and could accommodate changes to household dynamics or allow for rental.</p>

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16.	Natural Resource Solutions Inc. (NRSI) on behalf 2143 and 2187 Gordon Street (29/03/2022)	Concern about discrepancies and inconsistencies related to the classification, definition, delineation, and management of Plantations and woodlands as defined by the City of Guelph Official Plan.	The policies for specific natural heritage system land use designations are not the subject of OPA 80. These comments will be considered in the next phase of the Official Plan Review.
17.	Dr. H. Whiteley Delegation at Public Meeting (30/03/2022)	OPA 80 does not include policies for phasing of development, this is a major gap.	The Official Plan contains objectives and policies for managing growth including policies to manage and support forecasted growth with integrated planning for infrastructure and public service facilities. The policies in the Official Plan set out a rate and direction for growth while the capital budget and infrastructure planning set the pace. Phasing of development has been set out for the Clair-Maltby Secondary Plan area which is the largest, undeveloped greenfield area in the City.
18.	Laura Murr Delegation at Public Meeting (30/03/2022)	<p>Would like Figure 3 of the Tier 3 plan to be added to the Official Plan.</p> <p>Would like the designation of lands on Niska Road reconsidered.</p>	<p>The Tier 3 water quantity policies have not been approved so it is not appropriate to include figures from it in OPA 80. As the policies are approved, the sourcewater policies in the Official Plan will be reviewed and considered for amendment.</p> <p>The designation of lands on Niska Road were the subject of an Ontario Municipal Board hearing and the former OMB approved the residential land use designation.</p>
19.	William Farr Delegation at Public Meeting (30/03/2022)	Concern that the zoning bylaw should not make it easy for developers to amend it.	Comments provided were about the Zoning Bylaw and are not within the scope of OPA 80.

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20.	Susan Watson Delegation at the Public Meeting (30/03/2022)	Concern that growth does not fully pay for growth. Delegated about parks plan and parkland dedication bylaw.	Response to comments about growth paying for growth were addressed through the Fiscal Impact Analysis presented to Council on March 30. Open space and parks policies are not within the scope of OPA 80.
21.	Ted Michalos Delegation at the Public Meeting (30/03/2022)	Comments on behalf of Families for Rolling Hills requesting that their neighbourhood be protected for the good of everyone in the City and that the entirety of Rolling Hills be placed in the estate residential designation.	Revisions are proposed to the Rolling Hills area as noted in line 10.
22.	Lin Grist Delegation at the Public Meeting (30/03/2022)	Comments about parkland and parks plan and that the Ontario Reformatory should be a large park.	Open space and parks policies are not within the scope of OPA 80.
23.	Natural Heritage Advisory Committee (14/04/2022)	Concern expressed about the draft policies that may permit essential City infrastructure within the Natural Heritage System (NHS) if the infrastructure is assessed and approved through an Environmental Assessment (EA). Support for the way 'net ecological benefit' is dealt with in the Environmental Assessment policies. Suggestion that a definition be provided for 'net ecological benefit'.	The intent of the policy for environmental assessments and essential infrastructure is to ensure that a complete evaluation can be conducted through an EA where municipal infrastructure meets the definition of essential and to ensure that the EA results in no negative impact and a net ecological benefit. It is difficult to define net ecological benefit because it will differ depending on the feature, site specific considerations and the individual project parameters. The EA process will determine what the net ecological benefit is and how it is implemented.
24.	Planning Advisory Committee (7/04/2022)	Could the city meet an increased population of 10,000 in order to	The growth scenarios looked at different ways to achieve the population target for the City. The recommendation to increase the population

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		<p>achieve the 50% intensification target?</p> <p>Supportive of changes to Commercial Mixed-use Centre, Mixed-use Corridor and High Density Residential but why haven't changes been made to low density residential in the built-up area to increase density there?</p> <p>Perhaps use the Urban3 model to look at built form and propose changes to form on the basis of their findings.</p> <p>There is an opportunity to further explore height and density across the low density residential designation, why not have consistent height?</p> <p>Maintain three-storey limit in low density residential.</p> <p>There is an opportunity to look at changes to low-density residential that could be accommodated without dramatic changes to neighbourhoods.</p> <p>Look at opportunities to accommodate infill within the built-up area</p> <p>Reasonable and efficient approach to look at growth in transition areas and deal with it through clusters of high density.</p>	<p>by 5000 accommodates the intended development of Dolime as per the settlement pathway endorsed by Council and seeks a modest adjustment to the residential intensification rate of 46 per cent. The city is already challenged to meet the minimum 50 per cent residential intensification rate on an annual basis during the years that its newest designated greenfield area, the Clair-Maltby Secondary Plan area, is building out. Adding more population to the DGA and not the BUA would exacerbate this issue. Therefore, a decrease in the intensification rate could be supported given the approved pathway for Dolime.</p> <p>Some changes were recommended to the low density residential land use designation in OPA 80 to accommodate intensification along arterial roads. The recommendation provides for a maximum net density of 60 units per hectare on arterial roads. The three storey height is maintained within the built-up area and the height is reduced to 4 storeys in the greenfield area.</p>

*letters included in the Council agenda for the [March 30, 2022 Statutory Public Meeting](#). All other letters are contained in Attachment 5 to Report 2022-225.