

March 17, 2022

Melissa Aldunate
Manager, Policy Planning and Urban Design
Planning and Building Services
City of Guelph

Dear Ms. Aldunate,

RE: City of Guelph OPA 80 – Silver Creek Parkway North Mixed Use Corridor

MHBC has been retained by Armel Corporation to review and advise on the City of Guelph's Official Plan review and Official Plan Amendment 80. Armel Corporation has significant land holdings throughout the City and as long term developers with over 65 years of history in the City, they play a direct role in achievement of the City's planning and development objectives. The comments in this letter are specific to Armel's property at 240-258 Silver Creek Parkway.

Subject lands

The subject lands are located on the north side of Speedvale Avenue and the west side of Silver Creek Parkway. The Hanlon Expressway borders the lands on the west side. The lands contain two one storey commercial plazas and associated surface parking. The northerly portion of the lands is vacant (± 1.8 ac.).

When this site was developed it was on the outskirts of town. In the current day context this site has a prominent location in a high visibility and high traffic corner of the City, particularly given its visual exposure to the Hanlon Expressway. Existing development on this site greatly underutilizes its potential – it is a prominent property in a strategic location.

The lands are currently designated as Mixed Use Corridor in the City's existing official plan. Armel's concern is that OPA 80 proposes to remove the lands from the Mixed Use Corridor designation (see attached mapping). Therefore, Armel requests that the City retain the subject lands within the Mixed Use Corridor 1 designation.

Intent of the Mixed Use Corridor designation

The City has identified a number of Strategic Growth Areas which are intended to accommodate a significant share of the City's future population and employment growth. Mixed Use Corridors are included within Strategic Growth Areas and therefore, they are intended to accommodate new growth at medium to high levels of density. The Mixed Use Corridors are located in areas that allow them to serve both the needs of residents living and working in the corridor and those in nearby neighbourhoods and employment districts. The policies of the current official plan and the proposed official plan amendment 80 encourage mixed use and allow for a wide range of commercial, institutional, office, service and residential uses.

Rationale for the subject lands remaining within the Mixed Use Corridor designation

After having reviewed the proposed OPA 80 and the City's Growth Management Strategy that is the basis for OPA 80, it is my opinion that the Mixed Use Corridor designation is exactly appropriate for the subject lands for a number of reasons:

1. The lands are well located for high density development

The subject lands are located at the intersection of two arterial roads (Silver Creek Parkway and Speedvale Avenue) and adjacent to the Hanlon Expressway. The lands are not adjacent to low rise residential neighbourhoods and thus increases in height and density would have little impact on adjacent lands.

2. The lands have capacity for intensification

The lands are currently under-developed and have capacity for considerable intensification. There are two, single storey commercial plazas with associated surface parking lots on the property. Given that the lands are adjacent to high capacity transportation networks, there is considerable capacity on the lands for greater density of development at the scale envisioned by the Mixed Use Corridor designation.

3. Mixed use development on the subject lands will not result in a loss of employment lands

The subject lands are not designated employment lands. The lands have been zoned for commercial uses, with residential permissions for many years. While there are designated employment lands to the east, north and further to the west, the subject lands are not part of the City's employment lands and therefore keeping the lands within the Mixed Use Corridor and allowing for intensification and mixed use development will not result in a loss to the City's designated employment lands.

4. Land use compatibility with adjacent employment lands can be addressed.

The Mixed Use Corridor designation allows for a range of land uses including medium and high density multiple unit residential buildings. Given that there are designated employment lands in close proximity to the subject lands, it is acknowledged that land use compatibility would have to be addressed should residential uses be proposed. However, concerns that there may be land use compatibility issues should not be a reason to remove the subject lands from the Mixed Use Corridor designation. Existing official plan policies, as well as provincial policies and guidelines, require that any land use compatibility issues be addressed should residential uses be proposed.

In conclusion, I ask that staff reconsider the land use designation for the subject lands that are proposed by Official Plan Amendment 80. For the reasons stated above, it is my opinion that retaining the lands within the Mixed Use Corridor is appropriate and will lead to development that better achieves the City's long range planning and growth management objectives.

Yours truly,

MHBC

A handwritten signature in cursive script that reads "Dan Currie".

Dan Currie, MA, MCIP, RPP
Partner

cc. Mandy Scully, Armel Corp.
Chris Corosky, Armel Corp.

March 23, 2022

Melissa Aldunate
Manager, Policy Planning and Urban Design
Planning and Building Services
City of Guelph

Dear Ms. Aldunate,

RE: City of Guelph OPA #80

MHBC has been retained by Armel Corporation to provide input to the City of Guelph's Official Plan Review and specifically OPA 80. Armel Corporation has significant land holdings throughout the City and as long term developers with over 65 years of history in the City, they play a direct role in achievement of the City's planning and development objectives.

Armel has participated in the City's Municipal Comprehensive Review process and had provided several comments on the Growth Management Strategy. After having reviewed the draft Official Plan Amendment 80, we offer the following comments for staff and Council consideration.

1. Maximize the intensification potential in Strategic Growth Areas

The Strategic Growth Areas are important components of the City's existing growth management strategy and provide significant opportunity for accommodating the forecast future growth. We are pleased to see that the recommended height and density within Strategic Growth Areas has been increased. This is positive and, in our view, necessary.

We would suggest, however, that the City can be much bolder in its approach to accommodating density. In our experience in other communities, it is very difficult to achieve density of 250 units per hectare, achieve good urban design and limit height to 14 storeys. We recognize that many existing residents may have concerns about tall buildings. However, if the City intends to implement the recommended growth strategy and accommodate a considerable amount of future growth through intensification, the City is going to have to put in place a structure that is

capable of accommodating that level of development. Tall buildings greater than 14 stories are a necessary part. Much of the land within Strategic Growth Areas is located away from low density residential areas and therefore there is little impact to increased height and density in these locations.

The height and density policies in the Medium Density Residential designation are proposed to remain unchanged. The City should consider increasing permitted height and density in Medium Density Residential designated lands – particularly for those that are located within Strategic Growth Areas. For lands within a Strategic Growth Area the maximum density of 100 units per hectare is very low. Given that the ability to allow for increased height and density on a site specific basis through the bonusing policies has been removed, the City should increase the maximum density levels of medium density designated lands within Strategic Growth Areas to ensure there are sufficient opportunities to accommodate forecast growth and achieve the planning objectives for these areas.

2. Maximize intensification potential in Commercial Centres and Corridors outside of Strategic Growth Areas

More flexibility is needed in the commercial land use policies. The current policies and regulations discourage achievement of mixed use and residential intensification in particular. Given the level of intensification needed to accommodate future growth, the City will have to be relatively aggressive in applying a permissive land use framework that will allow for and encourage the intensification needed to accommodate future growth.

a) Neighbourhood Commercial Centres

We understand that the City has not undertaken a detailed commercial needs assessment as part of the MCR process and therefore we recognize that the City is hesitant to make major changes to commercial land use designations. We still submit that, when the City does review commercial policies, the City needs to review the planned function of Neighbourhood Commercial Centres since in many cases this planned function to provide the day to day service and shopping needs for surrounding residential areas is no longer occurring due to the changing nature and evolution of commercial activity.

In the interim, we recommend that the City modify the current Neighbourhood Commercial Centre policies to be more flexible in allowing mixed use development. Currently, residential development is permitted but only within a mixed use building (i.e. commercial uses on the ground floor and residential units above). The City should consider modifying these policies

to allow for a *mixed use site* – meaning the residential uses could be in a stand alone multiple unit building provided the site is developed so that planned commercial function and commercial floor areas can be achieved.

b) Commercial designated lands on Wellington Street at Imperial Road

The majority of the lands on this corridor are designated Service Commercial. We note that permitting more mixed use including residential uses would provide greater opportunity for the City achieve the level of intensification required to accommodate forecast growth. The lands are well located for mixed use and policies and regulations could be implemented to ensure planned commercial function continues. We note that the proximity to the rail corridor should not be considered an impediment. There are existing policies and guidelines to manage rail related impacts and ensure development is compatible with surrounding uses.

c) Speedvale Avenue West Service Commercial Lands

The Service Commercial designated lands on the south side of Speedvale Avenue West provide opportunity for accommodation of growth. We recommend that the City should consider these sites for a wider range of uses allowing for redevelopment and modest levels of intensification. We acknowledge that the proximity to the employment lands on the north side of Speedvale Avenue (which permit a range of industrial uses) likely limits the ability for residential uses. However, given the location and the fact that Woodlawn Road will continue to be the prime location for vehicle oriented commercial uses in this part of the City, a greater range of uses and higher intensity of land use should be considered for the Speedvale Avenue corridor.

In conclusion, we recognize the considerable work that the City has completed to date and we appreciate the opportunity to provide comments as input to the process. We recommend that the City consider these comments in the preparation of the final version of OPA 80. We look forward to having the opportunity to continue the dialogue and would welcome further discussions with planning staff.

Yours truly,

MHBC



Dan Currie, MA, MCIP, RPP
Partner

cc. Mandy Scully, Armel Corp.
Chris Corosky, Armel Corp.
Daryl Keleher, Altus Group
Susan Rosenthal, Davies Howe



PLANNING AND DEVELOPMENT DEPARTMENT
T 519.837.2600
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ADMINISTRATION CENTRE
74 WOOLWICH STREET
GUELPH ON N1H 3T9

Melissa Aldunate, Manager
Policy of Planning and Development Services
City of Guelph
1 Carden Street
Guelph, Ontario N1H 3A1

Dear Ms. Aldunate,

Thank you for the opportunity to review and comment on Draft Official Plan Amendment 80 to the City of Guelph Official Plan. We have reviewed the proposed amendment and have the following comments to provide:

Proposed ITEM 18

The stated purpose of item 18 is to renumber section 3.5 Urban-Rural Interface: Planning Coordination and to modify the policies for clarity and consistency with the County of Wellington's Official Plan.

We note that the proposed language in policy 3.14.2, is inconsistent with County Official Plan policies that relate to section 4.7 Urban Area Protection. While the policy does prohibit development adjacent to existing urban centres, it also clearly states that this policy is not intended to prevent previously approved development, logical infilling or development of a minor nature which would not impede the efficient expansion of the urban area. Additionally, the expansions of existing developments may be considered if the overall intent of the section is met.

We request that section 3.14.2 be revised to "prohibit or limit" development adjacent to the City's settlement area boundary.

Proposed ITEM 100

We wish to indicate that we have no concerns with the Dolime Quarry lands being shown on the various City Official Plan land use schedules. This change is a result of a recent Ministerial Zoning Order which annexed these lands from the County into the City of Guelph. The County and the Township of Guelph/Eramosa were consulted and supportive of this process.

However, we do wish to receive the GIS data the City is using to delineate the new city limits in this area. We wish to carry forward a consistent and accurate boundary into revised County Official Plan Land use schedules. We have also been directed by the Ministry of Municipal Affairs and Housing to obtain this data from the City.

Urban-Rural Transition Policies

The Urban - Rural transition is an important policy matter for the City to consider as growth pressures in urban centres increase and greater emphasis is placed on intensified greenfield development at the periphery of cities.

We would request that OPA 80 be revised to include additional policy direction applicable to development within the City's urban fringe to help achieve an appropriate transition to rural areas in the County. Policy additions to this effect would create a clearer expectation for development in the urban fringe and clarify that land use transition and compatibility considerations should include rural lands in the County.

County Staff are happy to discuss this matter in more detail and appreciate the work that has been advanced to date on this matter in the Clair Maltby-Secondary Plan area.

I trust that these comments will be of assistance to you in the review of this matter.

Yours truly,



Jameson Pickard, B.URPL. RPP, MCIP
Senior Policy Planner

March, 2022

Melissa Aldunate
Manager, Policy Planning and Urban Design
Planning and Building Services
1 Carden Street
Guelph, ON
N1H 3A1
plan20151@guelph.ca

Dear Melissa:

**RE: City of Guelph Official Plan Review (OPA 80): 5102 Whitelaw Road
OUR FILE 21323B**

We are writing today on behalf of our clients, Scott Robinson and Rolf Deter, with regards to the City of Guelph's Comprehensive Zoning By-Law review. Our clients, Scott Robinson and Rolf Deter own property located at 5102 Whitelaw road, at the corner of Whitelaw Road and Fife Road, in the City of Guelph (**Figure 1**). Under the Official Plan Amendment, a portion of their property is proposed to be redesignated from "Low Density Greenfield Residential" to "Low Density Residential" (**Figures 2 & 3**). We request that the City consider applying the Medium Density Residential designation to the property for reasons set out in this letter.

The property is located at the intersection of Fife Road and Whitelaw Road, along the western limit of the City of Guelph. The portion of the property that is located within the City of Guelph's Boundary is currently in fallow. The remaining majority of the property is located within Guelph-Eramosa Township, and is actively farmed. Any future development of the lands will require severance of the portion of the property within the city from the larger parcel and appropriate site plan approvals.

Land Use Context

Surrounding land uses within the City boundary (North, Northeast, and Northwest) are a mix of residential uses and densities. Immediately to the northeast of the property is the Fife Road Co-operative housing development, which is currently designated as medium density in the existing Official Plan and is proposed maintain that designation in OPA 80. To the direct north and Northeast of the property, lower density housing in the form of single detached dwellings predominate. South, southeast and southwest of the property are lands located within the Township of Guelph-Eramosa, which are primarily characterized by agricultural and rural lands, with some rural residential uses. A medium density development would be appropriate given the surrounding context, would fit within the character of the existing neighbourhood, and create a mixed neighbourhood with a range of housing types.

City of Guelph Official Plan Review & Official Plan Amendment (OPA) 8o

The lands are designated as “Low Density Greenfield Residential” in the current City of Guelph Official Plan, and are located in the designated Greenfield Area. This designation permits a height maximum of 6 stories, and provides policies for increased density up to 100 units per hectare based on its location along Fife Road and Whitelaw Road, which are designated arterial roads. OPA 8o proposes to eliminate the “Low Density Greenfield Residential” designation in its entirety. Further, OPA 8o proposes to eliminate density bonusing policies which currently apply to the existing “Low Density Residential” designation. These policies previously permitted up to 6 stories and 100 units per hectare, subject to certain policies of the plan.

As such, the subject lands are proposed to be redesignated to “Low Density Residential.” This designation, combined with the removal of density bonusing policies, effectively removes existing development rights which are permitted in the current Official Plan. This includes limiting the density from 100 units per hectare down to 60 units per hectare, and reducing the height limit from 6 stories to 4 stories. This significantly limits the development potential of the lands.

We believe a “Medium Density Residential” designation better reflects the development rights which are currently in place on the property, as this designation would permit the 6 stories and 100 units per hectare that would have applied under the previous “Low Density Greenfield Residential” designation when combined with the current applicable bonusing policies in section 9.3.3.4. The property should be designated “Medium Density Residential” to accommodate for the removal of these bonusing policies which would have applied to the subject lands in order to better reflect what is currently allowed.

The property is capable of handling a higher density than currently proposed for several reasons which are consistent with the Official Plan’s policies for determining increased density in residential areas. The property is located adjacent to a medium density land use, which is proposed to maintain that density through the proposed OPA 8o. A “Medium Density Residential” designation on the subject property would thus be consistent with surrounding buildings and land uses in the area.

The subject property is also located in proximity to many public services and amenities. Within one kilometre of the site are convenience stores (Hasty Market & Emesa Market), a church (Parkwood Gardens Community Church), Gateway Drive Public School, and Springdale Park. Just beyond this proximity, and within 1.5 kilometres of the site are grocery stores, restaurants, and retail shops along Paisley Road, and retail food stores along Imperial Road and County Road 124. The West End Community Centre is located just beyond this 1.5 kilometre radius (1.7 km, approximately).

Being at the Corner of Fife Road and Whitelaw Road, the subject property is very well serviced by public transportation. Within approximately 300 metres of the subject property is a bus stop, with access to 2 bus routes, providing access to the downtown core and several employment areas within the City.

Additionally, roads surrounding the property such as Fife Road, Wellington Street, Elmira Road, and Imperial Road South are all dedicated bike routes, as indicated on the City’s transportation system map. Fife Road and Whitelaw Road (north of Fife) are both identified as arterial roads within the City’s Official Plan, and policies generally promote medium density development for residential development proposals along arterial and collector roads.

Conclusion

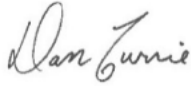
For these reasons, we request that the City consider designating the property as Medium Density Residential to permit a net density of 100 units per hectare and height of up to 6 stories. By way of this

letter, please include us in any future correspondence and updates regarding the City's Official Plan Review.

If you have any questions, please reach out to the undersigned.

Yours truly,

MHBC



Dan Currie,
MA, MCIP, RPP, CAHP,
Partner

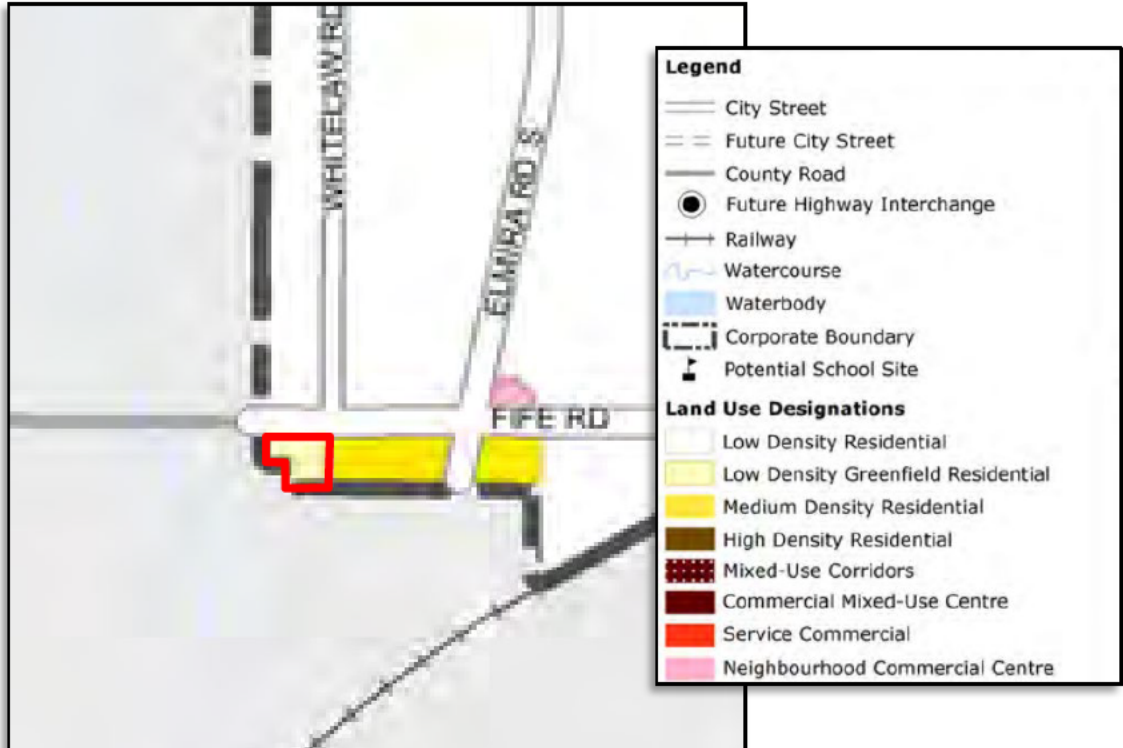


Dawson McKenzie,
BA, Planner

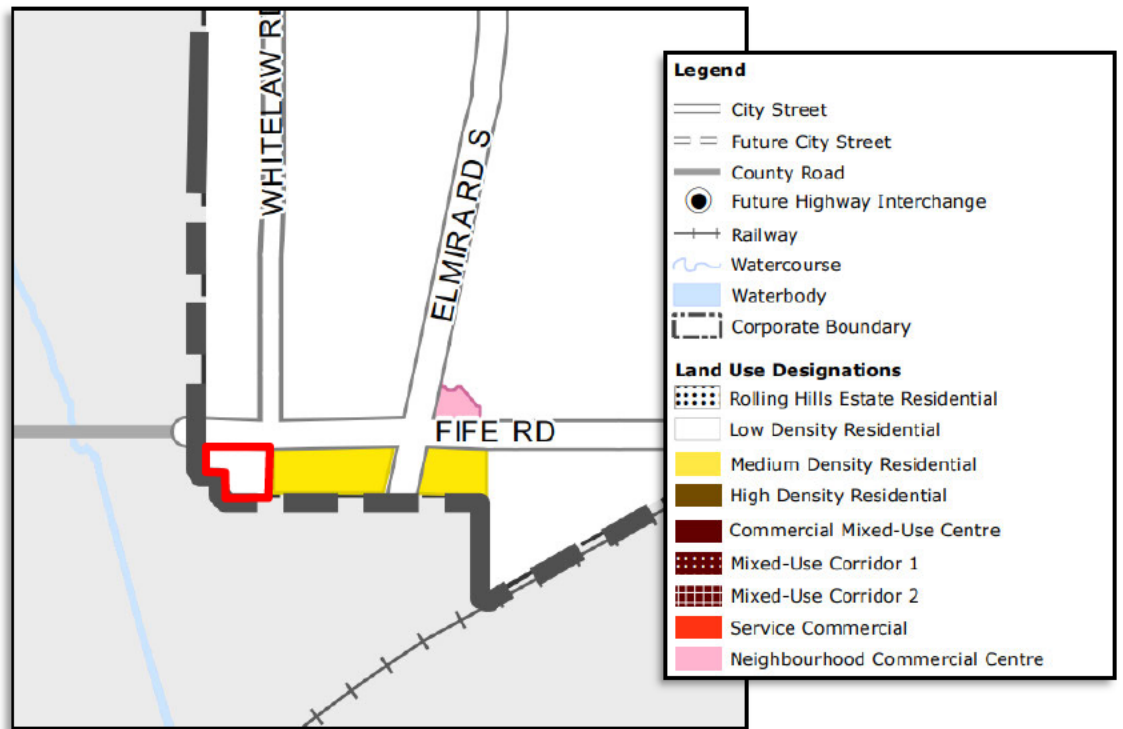
cc. *Scott Robinson & Rolf Deter*
Caitlin Port, MES, MCIP, RPP, Associate (MHBC)
Jason Downham, Planner (City of Guelph)



Figure 1: Property Location (Red)



3: Current City of Guelph Official Plan Designation (Property in Red)



2: Proposed City of Guelph Official Plan Designation (Property in Red)



March 29, 2022

City of Guelph
City Clerk's Office
1 Carden Street
Guelph, ON
N1H 3A1

Attention: Mayor & Members of Council C/O City Clerk

Dear Mayor & Members of Council,

RE: Comments: Proposed Official Plan Amendment No. 80
540 York Road
City of Guelph

I write to provide written comments regarding proposed Official Plan Amendment No. 80 (*OPA 80*), on behalf of the Registered Owner (*2793031 Ontario Inc.*) of lands municipally addressed as 540 York Road ("*Subject Lands*").

The Subject Lands are approximately 12,159 Square Metres in Site Area and are located within the York Road and Elizabeth Street intersection, just east of the existing railway, on the north side of York Road.

The Subject Lands are proposed to be designated 'Commercial Mixed-Use Centre' and the lands also form part of the York Road/Elizabeth Street Land Use Study.

Our office provided Written Comments regarding the Draft Land Use Study, dated December 1st, 2022. A copy of the Witten Comments submitted are attached to this correspondence including an updated Concept Site Plan.

We are supportive of the proposed designation of 'Commercial Mixed-Use Centre' for the Subject Lands. The designation was established through Official Plan Amendment No. 69.

The 'Commercial Mixed-Use Centre' designation is proposed to permit a maximum height of 10-Storeys and a maximum net density of 150 units per hectare and a minimum net density of 100 units per hectare, for free standing residential buildings and mixed-use building containing residential uses.

BLACKTHORN DEVELOPMENT CORP.

As a landowner at the Victoria Road and York Road intersection, our Client continues to support the vision for the York Road corridor, as a mixed-use corridor and therefore, has a vested interest in OPA 80 and proceeding to advance plans for a mixed-use building on the Subject Lands.

Through a Pre-Application Consultation Meeting held on July 7th, 2021, a Concept Plan consisting of a 10-storey building with commercial ground floor (*Grocery Store*), Apartment Dwelling Units above along with associated amenity and parking areas was considered by the City. On July 26th, 2021, the City of Guelph provided a Pre-Consultation Summary, outlining all requirements for to obtain Approval of the proposed development.

The Pre-Consultation Summary requires extensive technical studies and plans to ensure a Complete Application.

In reviewing OPA 80, wish to provide the following Comments consideration:

1. As we continue to discuss and further refine a Concept Plan pertaining to Subject Lands, requesting municipal input, we would respectfully request any new study requirements, arising from OPA 80, not be required as part of pending Applications as a Pre-Consultation Summary has already been provided.
2. The proposed height maximums and density requirements should provide for flexibility to consider additional height and varied densities through an implementing Zoning By-law, without an Amendment to the Official Plan required.

We wish to thank you for the opportunity to provide written comments regarding OPA 80.

Lastly, we respectfully request to be notified of any updates and Notice of any Decision regarding OPA 80 and we look forward to continued engagement opportunities throughout the planning process.

Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,

BLACKTHORN DEVELOPMENT CORP.

Maurizio Rogato, B.U.R.Pl., M.C.I.P., R.P.P.

Principal

Copy:
Client

Ms. Melissa Aldunate, RPP, Manager, Policy Planning, City of Guelph
Mr. Michael Witmer, Senior Development Planner, City of Guelph

From: [REDACTED]
To: [Plan2051](#); [Clerks](#); [Councillors & Mayor](#)
Subject: Official Plan Amendment comment
Date: Monday, April 18, 2022 7:32:59 PM

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Hello,

I have some input re: the official plan amendment discussions, with particular focus on the zoning designation of the George Street Armtec lands. I would like the city to reconsider the 'high density' zoning for future development of the land, and instead designate it as 'natural heritage' space. There are numerous reasons and benefits of doing this.

Reasons to remove the high density designation:

- A high density designation puts additional pressure on riverlands/watersheds, something that is already a problem in many parts of this city (and province). It would put pressure on the existing wildlife lives in the spaces adjacent to the property. It would encourage the further pollution (instead of continued remediation) of our river systems.
- The location does not lend itself to development intensification (and is not on an intensification corridor/node) because it is at the end of narrow and dead-end streets (one which has a very steep hill). There is insufficient road connectivity to manage a significant increase in population density and traffic in the area. There's also no way to increase road width/capacity in the area without demolishing existing houses.
- It is not part of the Downtown Secondary Plan growth area.

Benefits to changing to a natural heritage designation:

- Creating naturalized greenspace on this property would benefit the watershed and all the animals that live in the area. I have personally observed a range of animals that use the green space adjacent to Armtec: various warblers, 4 kinds of woodpeckers, kingfishers, cardinals, various waterfowl species, beavers, minks, muskrats, herons (2 kinds), foxes, toads and salamanders, and so on. There are also snapping turtles (listed as 'special concern' in the Ontario Endangered Species Act) that lay eggs in the area. I know one of the Armtec employees, and he tells me that they block off any nesting sites they find on the property, and then help relocate disoriented hatchlings to the river area. Any kind of housing development on this property will essentially guarantee a permanent loss of nesting spaces for these turtles and will also decrease other types of wildlife habitat that is currently available in the adjacent green space along the river.
- In contrast, a natural heritage designation would create a significant green corridor along the Speed River - a corridor that has minimal development and significant naturalized spaces, which ensures green spaces that are contiguous, rather than degraded and fragmented (and fragmentation of green spaces means reduced wildlife spaces). Please see this great, accessible discussion of the importance of green corridors: <https://treecanada.ca/blog/green-spaces-urban-wildlife-and-human-impacts/>
- Naturalizing this area would also create the opportunity for plantings that would encourage butterfly and bee populations (for example, native milkweed varieties could be nurtured in parts of the space; there's also a great opportunity to plant threatened native species trees like Kentucky Coffee-trees, or the endangered Cucumber Tree, which likes moist areas).
- Naturalizing this area and expanding greenspace would be beneficial to people who could

use trails and space to enjoy nature.

I encourage the city to think about and act on what could be achieved if this property was planned for future green space/naturalized space rather than dense housing development. As our global climate crisis deepens, taking local steps to preserve and expand green spaces and ensure things like surface water quality is critical for future liveability and sustainability. We have the opportunity right now to develop bold environmental visions, instead of falling back on dated 'build megadevelopments on every space' perspectives. This property could be a meaningful, sustainable, space for wildlife, plants, habitat, and human enjoyment.

Thank you,

Beth Finnis

From: [REDACTED]
To: [Plan2051](#); [Clerks](#); [Councillors & Mayor](#)
Subject: FW: Armtec site redevelopment
Date: Thursday, April 14, 2022 11:33:12 AM
Attachments: [Concept Drawing for Armtec Site.png](#)
[Concept Drawing2 for Armtec Site.png](#)

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

To whom it may concern.

I am reaching out to share frustration and point out some glaring issues with a bid to have development of an incredibly inappropriate project in my neighborhood at the Armtec site. The attached concept drawings for the listing of the Armtec property are ludicrous and very concerning – not only to me but to ALL residents in the area. This proposed development does not belong here and for many reasons.

My request is to:

- 1/ Have this site reviewed by council and rezoned immediately as low-medium density from the current High Density designation.
- 2/ Establish a survey to assess remediation requirements for the location.

Here is a list of concerns:

- The site doesn't meet any of the Official Plan criteria identified for high density intensification:
 - not on an intensification corridor or node
 - not on a transit route
 - not adjacent to a major transit hub
 - not walkable to basic amenities (groceries, public school)
- The site is not within the Downtown Secondary Plan growth area
- The site is along to the Speed River, bisected by the Trans Canada Trail and a gap area in the Natural Heritage System
- The site is across from the Homewood site
- Armtec has been using harmful chemicals for decades and initially would bury garbage (PSB's and other harmful chemicals) onsite – long term remediation is required. With the current stable and untampered site today – PSB level testing will show current run off well exceeds acceptable levels of discharge directly into the Speed River. Remediation is a requirement at the site.

- The site is located interior to a neighbourhood of narrow dead-end streets, traffic capacity and egress from neighbourhood has one signalized exit at London Road
- Adjacent building form is low-rise 2 stories
- Angular planes for building height in Zoning Bylaw impossible to achieve

I await your response.

Sincerely,

Bob Millar

A very concerned Guelph resident on Dufferin St



Rendering of proposed Concept Plan



From: [REDACTED]
To: [Plan2051](#)
Cc: [REDACTED]
Subject: Zoning Change for the Armtec Site at 41-44 George Street - Coming to Council on July 18
Date: Tuesday, May 10, 2022 9:03:51 AM
Importance: High

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Hello,

I would like to provide input regarding the zoning change for the Armtec Site at 41-44 George Street. As a local resident this potential development will have a direct impact on our community, most importantly the Speed river and it's environment. I am not in favour of a high density development. I would like to be included in the correspondence and any meetings that I may participate in.

My personal and business contact is below;

Personal email: [REDACTED]

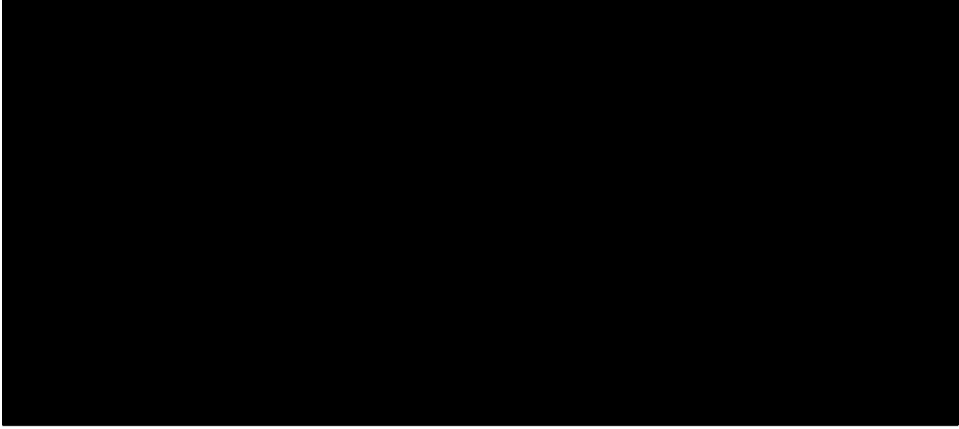
Cell: [REDACTED]

Address: [REDACTED]

Regards,

Carleen

Carleen Paterson



From: [REDACTED]
To: [Plan2051](#)
Subject: Armtec property
Date: Thursday, May 5, 2022 8:18:15 AM

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Dear City of Guelph,

Please do whatever is required to make this property parkland. It is along the river and the Trans Canada trail and needs to be open and green for all the people and wildlife to enjoy. Please do not allow residential development on this property.

Katherine Howitt,
[REDACTED]
Guelph, On

Sent from my iPhone

Sue Smith

[REDACTED]
Guelph, ON
[REDACTED]

May 3, 2022

Melissa Aldunate
Manager, Policy Planning
Planning and Building Services
City of Guelph
City Hall
1 Carden St.
Guelph, ON
N1H 3A1

CC: Clerk's Office, City Councillors, Mayor

RE: Official Plan
Zoning, George St. Armtec Site
City of Guelph

Dear Ms. Aldunate,

It has recently come to my attention that the site of the Armtec plant on George St. in Guelph is currently zoned high density.

I write to share with you and all of those who are responsible for updating the Official Plan my opinion that this site must be re-zoned. At the very best, these lands would be returned to greenspace and public parklands. At the least, this site should be re-zoned to Low Density.

The site is not on an intensification corridor or node. It is not on a transit route nor is it adjacent to a major transit hub. The site is located interior to a neighbourhood of narrow dead-end streets; traffic capacity and egress from the neighbourhood has one signalized exit at London Road. The site is not within the Downtown Secondary Plan growth area. The site is adjacent to the Speed River, across from the Homewood and is the perfect place to create more greenspace to benefit the public good and build resilience to climate change.

I request the city to take appropriate action to re-zone this site to Low Density or Parkland within the Official Plan.

Sincerely,

Sue Smith

April 14, 2022

Melissa Aldunate
Manager, Policy Planning and Urban Design
Planning and Building Services
City of Guelph

Dear Ms. Aldunate,

RE: City of Guelph OPA 8o – Strategic Growth Area – Paisley Rd/Whitelaw Rd/Elmira Rd S

MHBC has been retained by Paisley + Whitelaw Inc. (the owner) to review and advise on the City of Guelph's growth management review and more specifically, Official Plan Amendment 8o. Our client owns lands at the intersection of Paisley Road, Elmira Road South and Whitelaw Road.

Subject lands

The subject lands are located on the south side of Paisley Road between Whitelaw Road and Elmira Road South. The lands have frontage on all three streets and are currently vacant. Lands to the south and east are developed with low-density, low-rise housing. Lands to the west were recently approved by the OLT for a mix of medium and high density residential development. Lands to the north and northeast are either already developed with, or are planned for a mix of commercial and residential uses, generally high density in nature.

Official Plan and OPA 8o

The lands are designated "Medium Density Residential" and "Significant Natural Areas & Natural Areas" on Schedule 2: Land Use Plan in the City's Official Plan. The Medium Density Residential designation permits townhomes and apartments, with a minimum height of 2 storeys and a maximum height of 6 storeys. The maximum net density is 100 units per hectare. OPA 8o proposes to include the lands with a Strategic Growth Area. Our client supports the inclusion of their lands within the Strategic Growth Area.

OPA 8o does not propose changes to the land use designation for the subject lands, however there are proposes changes to the maximum permitted density for lands within a Strategic Growth Area.

Specifically, increases in the maximum permitted density are proposed for lands designated 'High Density Residential' and for lands designated "Commercial Mixed-Use Centre". The proposed increase is from 150 units per hectare to 250 units per hectare. However, no increase in density is proposed for lands designated Medium Density Residential that are within a Strategic Growth Area. The only change to the Medium Density Residential designation is to remove the policy that refers to the potential to increase height and/or density through density bonusing, as those policies are being removed from the Official Plan. As such, the actual potential permitted density for lands designated Medium Density Residential is decreasing as a result of the elimination of the bonusing policies. For lands within Strategic Growth Areas, this does not align with the objective of planning for and accommodating more growth and intensification in specific areas of the City.

Furthermore, there is a significant 'gap' in permitted density between High Density and Medium Density when both designations are in a Strategic Growth Area. This is particularly relevant for the Strategic Growth Area proposed for the Paisley/Whitelaw/Elmira Rd area which has lands with both High and Medium Density Residential designations. The lands designated High Density Residential have significantly greater development potential that offsets any potential loss of development potential resulting from the elimination of the bonusing policies. Not such offset is proposed for lands designated Medium Density Residential within Strategic Growth Areas.

Our client supports the principle of permitting additional density within Strategic Growth Areas but in order to achieve the intention of directing more growth and intensification to these areas, additional density and height should also be permitted for lands designated Medium Density Residential. Our client is concerned that such a significant difference exists in permissions for lands designated High Density Residential – they are permitted 2.5 times as much density and more height. Our client is also concerned that despite their lands being located within a Strategic Growth Area, their potential density is decreasing due to the elimination of the height/density bonusing policies and no corresponding increase in permitted density.

City staff and Council should consider increasing the permitted density for lands designated Medium Density Residential that are within a Strategic Growth Area to allow for the efficient use of these lands and to assist the City in achieving its growth management objectives. If the City does not support increasing the density and height for all lands designated Medium Density Residential within Strategic Growth Areas, our client supports a more site specific consideration for an increase in density and height for their lands. The lands are ideally situated to support an increase in density and height given their frontage on three roads and the significant size of the parcel. It is acknowledged that there are existing low density lands that abut portions of the subject property, but the City's Zoning Bylaw can include regulations to assist in the transition from Medium Density Residential lands to low rise residential areas outside of Strategic Growth Areas, as appropriate.

In conclusion, our client asks that staff consider increasing the maximum permitted density and height for lands designated Medium Density Residential that are located within a Strategic Growth Area, either generally or for the subject lands in particular, through Official Plan Amendment 80.

For the reasons stated above, we are of the opinion that permitting additional density and height on such lands will allow for the efficient use of lands planned for intensification and will assist the City in achieving its growth management objectives.

Yours truly,

MHBC

A handwritten signature in black ink that reads "Trevor Hawkins". The signature is written in a cursive style with a large initial 'T'.

Trevor Hawkins, M.PL, MCIP, RPP
Partner

cc. Paisley + Whitelaw Inc.

From: [REDACTED]
To: [Plan2051](#)
Cc: [REDACTED]
Subject: Rolling Hills OPA 80 / Shaping Guelph comment
Date: Monday, May 2, 2022 8:31:38 PM

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

To City Council,

We live at [REDACTED] Carlaw Place.

The actions of City Council to designate some properties be zoned for redevelopment sometime beyond 2051 creates an ***immediate imbalance in value with properties within a few hundred yards away*** in the same area which have been designated as estate residential. This nonsensical timeline of at least a minimum of 30 years and quite possibly longer **negatively impacts the values of those houses designated for re-development and undermines true price discovery and fair market valuation mechanisms**. Buyers looking for estates will not be interested in this timeline and neither will buyers interested in development. This puts all of these houses on an unfair footing regarding market valuation.

In my opinion this decision verges on **reckless discrimination** against some homeowners in favour of others in the same neighborhood. We believe that not only is this **unfair** treatment of a group of citizens but amoral.

We urge City Council to reevaluate the area they have designated for redevelopment in Rolling Hills sometime post 2051 and let it **remain as estate homes**. If the city and province actually do need the land for development sometime post 2051 then those decisions should be made in the appropriate timeframe closer to that date in advance of reasonable actions from developers. That would be **fair** treatment of the citizens of this city.

Thank you,

Mary Mathers and Maureen Van de Ven

[REDACTED]

From: [REDACTED]
To: [Plan2051](#)
Cc: [Melissa Aldunate](#)
Subject: Re Rolling hill open house on may 02, 2020
Date: Friday, May 20, 2022 10:53:20 PM

Dear city staff members,

Thank you very much for the informative and truly impactful presentation you made on the May 02, open house in regards to the Rolling Hills future plan. It was abundantly clear that you have spent a lots time and prepared an amazing and realistic developmental plan for south of Guelph, including area 1 of Rolling hills.

We (My wife Mitra and I) live at [REDACTED] Megan place located in area 1 of rolling hills. We moved to this location about 2 years ago to be beside our brother and sister in-law (they are at [REDACTED] Megan place).

While we are relatively new to this street, we truly enjoy living in this property. While our property located in a protected great area, we are in complete support of the city plan for rolling hills area 1 development. Living in a mixed neighbourhood will give us the opportunity to interact with more people and will enrich our life, while also enjoying our protected property. We have a 28 years old son who would love to have a house or an apartment very close to us, so we could provide possible support to his young and growing family.

We truly appreciate all the hard work and the extra care and effort you have put into this process for a better future for our city.

Sincerely,

Ali and Mitra Ashkar.

From: [REDACTED]
To: [Plan2051](#)
Cc: [REDACTED]
Subject: Rolling Hills Subdivision - BAGGIO 2 Megan Place Guelph ON.
Date: Friday, May 20, 2022 10:21:55 AM
Attachments: [image001.png](#)
[image002.gif](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Dear Melissa,

Let me take this opportunity to thank you and all the staff involved in the proposed changes outlined for the Rolling Hills Subdivision.

We have resided at [REDACTED] Megan Place since 1999 (Area 1) and have witnessed and lived the evolution of our neighborhood. It has evolved into a busy and productive corridor which now includes schools, religious establishments, various residential dwellings and commercial venues. It is truly an all-inclusive and integral part of the city. The recent proposal outlining the rezoning makes sense and allows the completion of a vision that has been steadily moving forward for years.

Our property is unique in that half is dedicated to protecting the Natural Heritage System and the other half allows for potential development. We appreciate the fact that our property is being considered for partial development but would also ask that there is on-going dialogue and an openness for reconsideration in having our entire property be considered for development. We are open to any communication and would fully participate in future discussions.

Let me reiterate our support of the planning department's effort to continue the progress of this productive region and thank them for including us as part of this vision.

Sincerely,

Angela and Alex Baggio



From: [REDACTED]
To: [Plan2051](#)
Cc: [REDACTED] "[Astrid Clos](#)"
Subject: FW: plan 2051 Guelph
Date: Friday, May 20, 2022 2:53:38 PM

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Guelph Planning Department and City of Guelph – Plan 2051

To: Members of the planning department, council and staff.

Please accept this letter as my recognition and support for all of the hard work and input which the city staff and council have brought forward through exhaustive efforts to recognize and respect the growth strategy plans within Guelph.

Council and staff have fully respected the input from all parties that have either supported or opposed growth areas within Guelph and as a result of your efforts City has compromised to find a fair and equitable balanced approach.

The concept of developing those lands known as Rolling Hills has definitely been an area which has evoked a lot of emotion and debate. I personally think that the Planning Department came up with a brilliant resolution to recognize and separate the north area #1 from the south portion of Rolling Hills #2 with a compromised approach to allow development in the north portion and offset any development of the southern area part #2 for some time. While not everyone will be content the City Planning Department has recognize the fact that an overwhelming number of land owners in Area #1 of Rolling Hills support and request to be included within the growth strategy being put forward to council.

By recognizing this area for redevelopment, we also recognize the changes within this area, the impact of road expansion which has taken place, we recognize the intensification of lands adjacent our properties and the mere fact that this area is not what it previously was. The land forms have changed and will continue to do so.

There have been arguments that Rolling Hills needs to remain as is in order to attract top quality professionals to Guelph, but that simply does not have any merit if you really look at that statement. The fact is that Rolling Hills is comprised of 52lots covering approximately 300 acres of land. If you had a 4% sales ratio annually then that would attract only 2 residents to this area, and the buyer would likely be a Guelph resident relocating. As such I do not believe that the estate lots attract any persons to Guelph at all.

If we look at housing needs and growth patterns within Guelph, then we truly need to recognize the contribution of what it means to intensify the north portion of lands. It means supporting families that want to really move from other areas to Guelph and to support Guelph families that are also moving within Guelph. It means that this area can have a profound impact to provide the foundation for families to live and to enjoy and recognize the contribution to meeting the growth strategies for Guelph and the Province of Ontario. The issue of providing homes for families is not just for Guelph, the issue is much greater than that. There is a need to provide homes within our province which are accessible, can provide opportunity for employment and a greater contribution to our society. That is how we attract people to move to Guelph and how we can attract educated professionals to this region, entrepreneurs and intellectuals alike.

I have enjoyed my home since 1998 and I would miss this home, however the times have changed

and the area has grown. It is time to allow others to live in this area and to contribute to the growth of Guleph

To close the doors and deny these opportunities to grow, when we have overwhelming support of those land owners in area #1 north side of Rolling Hills should not be considered. As land owners we also have the right to be included within the growth strategy and to contribute our lands to provide housing to meet the growth strategy. We ask that you strongly consider this area and we support your efforts in every way.

Sincerely, James Nagy, ■ Kilkenny Place

May 18th, 2022

RE: Comments in Response to May 2nd Rolling Hills Open House

As a 50-year resident of Guelph, a south Guelph resident, a local developer, and a Rolling Hills property owner within Area 1 – I wish to state my **CONTINUED SUPPORT** of staff's recommendation for Area 1 and Area 2 in Rolling Hills.

Guelph is facing the worst housing crisis in a generation of both affordability and a lack of supply.

Area 1 is located within the built-up area and represents the single largest intensification opportunity to add housing to the city's built-up area. If we pass on this opportunity, it will add an additional burden to every other neighbourhood that must then bear a disproportionate share of Guelph's infill housing.

The development of Area 1 would be an efficient use of city infrastructure – including roads, sewers, water, and hydro, while supporting the existing schools, parks, trails, and the commercial node. It would also allow for public transit supportive housing on an arterial road.

The proposed density along the south side of Clair Rd would help relieve some of the development on Gordon St and other parts of the city. It would be compatible with both the existing development on the north side of Clair Rd as well as Area 2.

I would like to commend staff for the work that they have done in striking a balance between the concerns of Area 1 and Area 2 while being respectful of the natural environment. I support the changes planning staff have made in accommodating the Area 2 concerns by designating Area 2 as Estate Residential and removing the collector road from the south Clair Maltby lands. This addresses Area 2 concerns of protecting their large estate lots and alleviating traffic.

We look forward to continuing the work with environmental planning staff on the delineation of the NHS boundaries.

Regards,

Michael Watt

From: [REDACTED]
To: [Plan2051](#)
Subject: May 2nd Rolling Hills Open House
Date: Friday, May 20, 2022 11:20:12 PM

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Dear City staff, planning and councillors,

We are the owner of [REDACTED] Megan place Guelph , Ontario . We own the house since 2015 and absolutely enjoying living here . We attended almost all of the meetings since the start to recent one . We would like to thank planning staff for comprehensive and detailed study , planning and clarifications during numerous meetings . As area one residence we are in support of including north of rolling hills in development plan to open more available . housing for the city of Guelph residents and inviting more to our city

- :It make more sense for this area being developed as it is
- in arterial road -1
- close to municipal services -2
- huge land per capita -3
- enough natural buffer between area one and two -4
- could address well the shortage of housing-5
- .Majority of area one are in support of city staff planning and recommendations -6

While we are in support of city staff comments , we need the city modify the natural heritage system boundary in their planing . We hired a company to study the natural heritage and their finding was what matches the current tree mapping while the city wants to . lump areas that are naturally far away or between two adjacent properties

Our concern is drawing the line now that does not match the reality and even an expert .company report to the city makes it difficult to change later down the road

We know a comprehensive study will be conducted at the time of development it is fair it be considered now . We are happy with mapping of the developable area presented at the .beginning of the the plan in 2018 or 2019

,With due respect
Mandana and Faz Ashkar , [REDACTED] Magan place

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Sent from Gmail Mobile

From: [REDACTED]
To: [Plan2051](#)
Subject: Fwd: May 2nd Rolling Hills Open House meeting response
Date: Thursday, May 19, 2022 3:09:19 PM

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Good afternoon,

I represent the ownership group for 331 Clair Road (2488995 Ontario Ltd.). Our property has direct access to Clair Road East and our property is not within the Rolling Hills subdivision. We have joined our Rolling Hills neighbours and have formed the South Clair Road Neighbourhood Association supporting the City's initiative of residential intensification along Clair Road East. I listened to the May 2nd, 2022 Rolling Hills Open House meeting and our group continues to support the staff's position and the land use official plan designations being proposed. We believe City staff are taking the right approach by dividing Rolling Hills into two areas for the purposes of planning and future development. City staff have found a good balance to proceed forward while protecting the natural environment and being fair and respectful of the concerns expressed by both Area 1 and 2 residents.

The Rolling Hills area has evolved from my family's farm from pre-1970s to the sale to Armel and then the development of the Rolling Hills subdivision. In June 2006 the Rolling Hills subdivision was included under the guidelines of the Places to Grow Act as a Built-Up Area. Fast forward to today and the current urban intensification, within the immediate area and within walking distance of Area 1, has been significant. Significant urban changes are:

- Dallan Subdivision - 400+ residential units with up to 6 storey mid-rise buildings along Clair Road
- Guelph Gurdwara - 410 Clair Road East
- Westminster Woods - completion of the community with the development of 4 storey mid-rise buildings with a commercial plaza at Clair and Victoria Road
- Gordon and Clair Commercial Node - Pergola Commons, Longos plaza, Zehrs plaza and another mid-rise residential building
- Completion of Westminster Woods Public School and Orin Reid Park - located 150m from our property
- Clair Road widening permitting designated left and right turn lanes
- Signalized intersection at Clair Road and Victoria Road S.
- Tricar and Thomasfield - mid to high-rise residential buildings along Gordon Street, south of Clair Road.

Therefore, we feel the official plan designations and the related policies proposed by city staff make sense, such as:

- Allowing for a gentle density and building height transition from Clair Road to the southern limits of Area 1.
- There are no vehicular road crossings of the NHS between Area 1 and Area 2.
- New development within Area 1 will be on full urban municipal services thereby maximizing the current built municipal infrastructure within Clair Road and to the north;
- Proposed "Rolling Hills Estate Residential" Official Plan designations have been created for

Area 2 ensuring property owners that their properties will remain untouched for many years

- Removal of the proposed collector road from the CMSP to the southern limits of Area 2

The redevelopment of Area 1 will meet the needs of the entire community, offering attainable housing while maximizing existing infrastructure and preserving natural heritage. We strongly urge Council to support the Low Density Residential and Medium Density Residential designations proposed for Area 1.

Thank you for the opportunity to provide these comments.

Pete Graham

GWD Developments Ltd. 80 Southgate Drive Guelph o. 519.827.1023 c. 519.820.0188

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GWD Developments Ltd. 80 Southgate Drive Guelph o. 519.827.1023 c. 519.820.0188

From: [REDACTED]
To: [Plan2051](#); [Melissa Aldunate](#)
Subject: Re Rolling Hills OPA 80 Have Your Say
Date: Sunday, May 8, 2022 6:33:32 PM

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Melissa: many thanks for the presentation made last week regarding the changes to the Rolling Hills neighbourhood and the progress of south Guelph. It was very informative and provided evidence of the many hours taken to put together a plan that is forward thinking, respectful of the environment and moving Guelph in the right direction.

We have lived here on Kilkenny Place since May 1995 and were one of the original homeowners in Rolling Hills. We moved in when the country was all around us and the address was RR#3. The city has moved to directly across the street. Even though we have planted over 1000 trees and changed the grade of the lot as well as the construction of a giant fence we cannot keep the progress and change that is happening literally in our backyard out. This is not news and has been happening over the years as Guelph has continued to grow and attract families to this area. The planning and design of what has occurred across the street is top notch. All types of homes and commercial development as well as schools, a library and a temple make this a fully inclusive neighbourhood and a very desirable place for families to live.

Therefore it is unrealistic to stop the next phase of progress- there really isn't a place for our type of residence in the new Guelph. The planning needs to continue and the opportunities for more families to live here in a mixed residential setting with access to commercial endeavors is only logical. We support the changes especially since the neighbours to the south have been heard and accommodated - they keep their homes and large lots and no roads will disrupt their vibe. Everyone wins as does Guelph.

Many thanks for all the hard work and effort that has clearly gone into this process.

Sincerely Jacquie Geall and Clay Seabrook

From: [REDACTED]
To: [Plan2051](#)
Cc: [REDACTED]
Subject: Rolling Hills OPA 80 Have Your Say
Date: Thursday, May 26, 2022 7:55:02 AM
Importance: High

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Hello,

I am a resident of [REDACTED] Kilkenny Place. I'm a fairly new owner in the Rolling Hills subdivision, moved there in 2018. I enjoy very much my nice house and the privacy but I also understand the need for development in our area. I am totally in favour of the development.

Many thanks for all the hard work and efforts made for this process, from the City Council, the Mayor, the City Staff, and the consultants.

Sincerely

Steno Carniello

March 29, 2022

1855

Stacey Laughlin
Senior Policy Planner
Planning, Urban Design and Building Services
Infrastructure, Development and Enterprise Services
1 Carden Street
Guelph, ON N1H 3A1

Dear Ms. Laughlin

**Re: Plantation Policy, Guideline, and Document Review and Comments
City of Guelph Official Plan Amendment (OPA) 80**

On behalf of Natural Resource Solutions Inc. (NRSI) and the owners of 2143 and 2187 Gordon Street, we have reviewed the draft Official Plan Amendment (OPA) 80 dated February 2022 and undertaken a review of policies and guidance for Plantations in the City of Guelph. Through this review we have identified some discrepancies and inconsistencies related to the classification, definition, delineation, and management of Plantations and woodlands as defined by the City of Guelph Official Plan (O.P.) (2021). Plantations are present throughout much of the City of Guelph and we feel that these discrepancies limit the ability for landowners, planners and other stakeholders to effectively manage these features in accordance with the City's O.P. Upon reviewing the City of Guelph Draft Official Plan Amendment (OPA) 80 in relation to other City documents that address Plantations, we feel these discrepancies still exist and should be resolved through OPA 80. In general, the issues that require further consideration in OPA 80 are related to the following:

- Plantation Definitions;
- Plantation Delineation; and
- Plantation Management

These topics are addressed in detail below, and include a thorough review of the treatment of plantations within the following documents:

- City of Guelph Official Plan (2021)
- City of Guelph Private Tree Protection By-law: (2010) – 19058
- City of Guelph Tree Technical Manual (2019)
- City of Guelph Official Plan Review, Draft Official Plan Amendment 80 (2022)
- City of Guelph Urban Forest Management Plan (2012)
- Provincial Policy Statement (2020)
- Forestry Act (1990)
- Ministry of Natural Resources and Forestry Wildland Fire Risk Assessment and Mitigation Reference Manual (2017)

Based on a detailed review of the above noted documents, and our understanding of the policies and guidance therein, we provide several recommendations at the end of this letter to address discrepancies regarding Plantations that we request be addressed in OPA 80 and other City documents.

Plantation Definitions

The Provincial Policy Statement (PPS) (2020) provides guidance for municipalities on the identification, classification, and protection of natural heritage features that is to be used to guide municipalities in establishing natural heritage systems. The PPS does not specifically define Plantations; however, we can infer that Plantations are included in the definition of Woodlands (Section 6.0 pp. 53) through the use of ‘treed areas’ and ‘woodland products’, as shown below:

Woodlands: *means treed areas that provide environmental and economic benefits to both the private landowner and the general public, such as erosion prevention, hydrological and nutrient cycling, provision of clean air and the long-term storage of carbon, provision of wildlife habitat, outdoor recreational opportunities, and the sustainable harvest of a wide range of woodland products. Woodlands include treed areas, woodlots or forested areas and vary in their level of significance at the local, regional and provincial levels. Woodlands may be delineated according to the Forestry Act definition or the Province’s Ecological Land Classification system definition for “forest”.*

The definition of Woodlands (and therefore Plantations) is based on the *Forestry Act* definition or the ELC definition of Forests. Plantations in the City of Guelph, except for cultivated fruit or nut trees or Christmas tree plantations, fall under the *Forestry Act* definition (Section 1.(1) pp. 1):

“woodlands” means land with at least,

- (a) 1,000 trees, of any size, per hectare,*
- (b) 750 trees, measuring over five centimetres in diameter, per hectare,*
- (c) 500 trees, measuring over 12 centimetres in diameter, per hectare, or*
- (d) 250 trees, measuring over 20 centimetres in diameter, per hectare,*

but does not include a cultivated fruit or nut orchard or a plantation established for the purpose of producing Christmas trees. (“terrain boisé”)

Conversely, the definition within the City of Guelph OP (2021) is unclear and appears to be based on narrow criteria related primarily to the history of a Plantation (Section 12 ‘Glossary’ pp. 364) rather than existing characteristics:

where tree cover is greater than 60% and dominated by canopy trees that have been planted:

- i) managed for production of fruits, nuts, Christmas trees or nursery stock; or*
- ii) managed for tree products with an average rotation of less than 20 years (e.g. hybrid willow or poplar); or*
- iii) established and continuously managed for the sole purpose of tree removal at rotation, as demonstrated with documentation acceptable to the planning authority or the MNR, without a forest restoration objective.*

Notwithstanding this definition, the City OP (2021) also states in Section 4.1.6.1 (pp. 60) that:

Plantations and hedgerows will be required to be identified through an Ecological Land Classification (ELC) in conjunction with proposed development applications.

While Section 4.1.6.1 (pp. 60) of the City of Guelph Official Plan (2021), states that Plantations are to be identified using the ELC system, the definition of Plantations in the Glossary (pp.364)

does not include reference to the ELC system. This produces some confusion as to how Plantations are defined, and subsequently how they are to be delineated.

Plantation Delineation

While the definition of Plantations provided within the City's O.P. would require that Plantations be delineated based on the management history of a given forest stand, the subsequent statement in Section 4.1.6.1 (pp. 60) of the O.P. requires the use of ELC to assess the existing conditions of a Plantation. This leaves the reader uncertain about how Plantations, that meet the ELC definition of Plantations but not the O.P.'s definition, should be identified. This appears to be a gap in the City's definition of Plantations and challenges the extent to which Plantations may be appropriately managed within the City.

It is understood that the NHS as shown in the City's O.P. (2021) is derived from OPA 42 documents that included an ELC map identifying areas of Cultural Plantation. During the OPA 42 settlement process, Significant Woodlands were identified and mapped. While Plantations were identified using the ELC system and mapped in OPA 42, these wooded areas were not identified as part of the NHS. As such, there are several areas within the City of Guelph where Plantations extend outside of the NHS.

The following provides excerpts from the CEIS that discusses the approach taken to making NHS refinements.

Section 2.1.6.4 (pp 30-31) includes several Steps that the City took to identify Significant Woodlands and Cultural Woodlands in the Clair-Maltby Area. Step 1 states:

- **Step 1:** *Mapping of all apparent and confirmed woodlands and forests (including plantations¹²) as accurately as possible based on air photo interpretation supplemented by scoped field verification (ref. Map NH-2 series in Appendix E);*

Footnote 12 (pp. 30) states:

Although the original OPA 42 NHS mapping excluded plantations from the NHS irrespective of their location in relation to other natural areas, the OPA 42 policies supersede the mapping and since about 2014 have been interpreted and implemented such that plantations and cultural woodlands contiguous with other significant woodland features are also considered part of the significant woodland. This approach was maintained for this project.

For properties with OPA 42 settlements, the CEIS states (pp. 17):

The overall approach taken to NHS refinements has been to respect agreements made related to the interpretation of the applicable OPA 42 policies through the OMB process, while identifying refinements to the NHS (where appropriate), based on new information collected as part of the CMSP CEIS process (e.g., significant wildlife habitat).

Contiguous cultural woodlands will become Significant Woodlands, as stated in Step 2:

- **Step 2:** Screening the ELC mapping against the City's policies for Significant Woodlands and Cultural Woodlands¹³ (as detailed in the Phase 1 and Phase 2 Characterization Report, Wood *et al.*, 2018);

Footnote 13 (pp. 31) states:

Woodlands are treated as contiguous in the City's policies unless they are separated by a gap of greater than 20 m. Cultural Woodlands, as defined in the City's Official Plan, that are contiguous with, or separated by, less than 20 m from a woodland considered significant, are considered part of the Significant Woodland.

Section 2.1.6.4 (pp 31), specifically speaks to OPA 42 settlements:

- **Step 3:** *Compliance with any site-specific agreements including mapping related to Significant Woodlands made as part of an OPA 42 settlement before the OMB (ref. Map NH-1 series in Appendix E)*

Based on this approach, there are several locations where Plantation areas, as mapped using ELC in the CEIS (Map NH-2), extend outside of the NHS. Since the delineation of these features is not consistent within the O.P., it is not clear how these areas (of ELC Plantation) outside the mapped NHS will be treated by the City as development planning proceeds.

Plantation Management

It is our understanding that, as the City is a single-tier municipality, City policies primarily govern environmental management within the City limits. This includes any activity that will impact woodlands, Plantations, and individual trees. While there is no specific forest management policy within the City's O.P., the City's Private Tree Bylaw (#19058) regulates the destruction or injury of trees and is the principal policy that would govern any proposed forest or Plantation management activity. Specifically, any proposed forest management activity or active management of a Plantation, including the harvesting or thinning of a plantation, would first require the approval of a private tree removal permit (City of Guelph Private Tree By-law (2010 – 19058)). In order to obtain a permit, a "tree management plan" must be submitted to the City.

Plantations are part of the Urban Forest; however, the Urban Forest Management Plan (2012) does not address Plantations or how to manage them appropriately. The Tree Technical Manual (2019) discusses compensation for Plantations but only in terms of removal of areas of Plantation. It does not consider removal of individual trees to encourage succession within a typical Plantation feature.

The definitions and policies in the O.P. and the Private Tree By-law ((2010) 19058) illicit confusion regarding the management and ultimate intention of Plantations. The following provides excerpts from the O.P. that highlights the discrepancies causing confusion.

As a side component of this issue, the City's O.P., guidelines, and supporting documents do not include a definition of 'continually managed', which results in a gap in the definition of Plantation.

The definition of Forest Management in the City's O.P. includes reference to selective cutting in Plantations (Glossary, pp. 355).

Forest Management means:

the sustainable management of the woodland to maintain, restore or enhance environmental conditions for wildlife, and for the protection of water supplies and may include the removal or pruning of dead, diseased, and hazard trees, and invasive species. Management may also include the judicious removal of selected tree(s) to improve the diversity and health of the woodland e.g., selective cutting of plantations to permit natural succession to occur. However, forest management does not include the removal of trees solely for commercial purposes.

Section 4.1.2.1. of the O.P. (pp. 33) General Permitted Uses states:

Development and site alteration shall not be permitted within the Natural Heritage System, including minimum or established buffers, except for the following uses:

v) forest management;

According to Section 4.1.6.2.3. of the O.P. (pp. 61) a compensation plan is required to remove trees greater than 10cm DBH within a Plantation:

A Vegetation Compensation Plan shall be required for the replacement of all healthy non-invasive trees measuring over 10 cm dbh, proposed to be removed.

This suggests that compensation is required to actively manage a Plantation.

The City's definitions and existing policy framework discourage the management of existing Plantations because of the requirement to compensate for tree removals. If a landowner chooses to prepare a forest management plan and conduct management activities within a Plantation, including selective or row thinning, the City would require compensation for the removal of these trees despite the fact that this management activity would encourage natural succession and regeneration within that Plantation. The City would also require a Tree Management Plan, which requires financial investment. All of this could deter a landowner from managing a plantation based on financial concerns. This may then result in Plantations becoming overly dense or declining as a result of the affect forests pests and diseases known to impact these homogeneous communities.

The management of Plantations also has a wildfire risk component. Overstocked and unmanaged coniferous Plantations may contain higher fuel volumes that may increase the potential for wildfires. The PPS requires that municipalities assess wildfire risk using the Wildfire Risk Assessment and Mitigation Reference Manual. Section 3.2. Wildland fire policy definitions states under the Definition of hazardous forest types for wildland fire:

Forest vegetation, or fuel types, that are associated with the risk of high to extreme wildland fire include: natural conifer forests and unmanaged conifer plantations that can include spruce (black or white), jack pine and balsam fir tree species; immature red and white pine; and mixedwood forests with more than 50 per cent conifers (jack pine, spruce, balsam fir and immature red or white pine). Forest conditions that are associated with the risk of high to extreme wildland fire include vegetation that has sustained storm or insect damage or is diseased, trees that are close to one another (high density) within conifer forests, and an abundance of ground fuel accumulation (e.g., large amount of woody debris, branches and or needle litter on the ground).

The City's policies that require the retention of woodlands and Plantations must therefore consider fire risk. Mitigation for reducing wildland fire risk in the Wildfire Risk Assessment and Mitigation Reference Manual (2017) includes ongoing vegetation and fuel management techniques including, but not limited to; selective harvesting/thinning of trees within the forest to decrease stand density, removing excessive woody debris, branch pruning, and/or introducing deciduous tree species to the stand (pp.41)). The Wildfire Risk Assessment and Mitigation Reference Manual (2017) identifies natural and unmanaged coniferous plantations as being of a high to extreme wildland fire risk. Alternatively, mixedwood forests and managed or maintained coniferous Plantations are considered to be of a moderate to low risk factor.

Item 46 of the City's Draft OPA 80 provides for the addition of "Section 4.4.3 Hazardous Forest Types for Wildland Fire", which aims to provide policy direction within the O.P. regarding Hazardous Forest Types that is consistent with the Provincial Policy Statement. Item 46 identifies the proposed policies as:

1. *Development* shall generally be directed to areas outside of lands that are unsafe for *development* due to the presence of *hazardous forest types for wildland fire*.
2. *Development* may, however, be permitted in lands with *hazardous forest types for wildland fire* where the risk is mitigated in accordance with *wildland fire assessment and mitigation standards*.

While these policies generally encourage the mitigation of wildland fire risk, they do so specifically in relation to development. The proposed policies do not appear to allow for the mitigation of wildfire fire risks through the use of the recommended management practices described above in cases where development is not a consideration. As unmanaged coniferous Plantations have been identified as a vegetation type of high to extreme wildfire fire risk, policies encouraging the appropriate management of these features are anticipated to more effectively mitigate wildfire fire risk. Our experience with and understanding of the City's current policies, guidelines, and supporting documents is that the recommended mitigation measures for wildland fire risk are not permitted within the City of Guelph without the fulfillment of permitting and compensation requirements.

Recommendations

Based on our review and understanding of applicable policies, guidelines, and supporting documents, we provide the following recommendations to the City to be considered in OPA 80.

1. Active forest management is essential to encourage the natural succession of conifer Plantations into uneven aged, mixedwood forests with the capacity to be self-sustaining. It is also understood that managed or maintained coniferous plantations, as well as mixedwood forests are considered to be of a lower wildland fire risk compared to unmanaged Plantations. Without natural disturbance and thinning, unmanaged conifer Plantations experience little understory light and dense litter layers that impede the establishment of new species within the stand, thereby increasing the likelihood of that stand's decline and risk of wildfire. This results in many Plantations representing even-aged monocultures unable to perform the ecosystem services of a native mixedwood forest.

The City's current OP definition of Plantation, specifically the requirement for Plantations to have been established for the development of tree products or for the sole purpose of tree removal at rotation, limits the potential for these features to undergo the appropriate forest management activities that would allow for their succession into mixedwood forests and improved ecological function. The term 'continuously managed' is not defined or elaborated on in the OP or other tree related documents, including the Urban Forest Management Plan (2012). As such, the City's expectations for Plantation management are not clear, and are not consistent with standard and accepted forest management approaches, including wildfire management as mandated by the PPS.

Recommendation – include policy in OPA 80 and update the City's Private Tree Protection By-Law to allow for active management of plantations through selective tree cutting or row thinning, without the need for compensation so that landowners may

encourage the succession of their plantations into mixedwood forests without compensation.

Recommendation – include policy in OPA 80 that plantation management is conducted by the landowner prior to dedication to the City, with the caveat that the landowner receives a credit of some kind. This will have a positive impact on costs incurred by the City upon taking over the plantations (to manage wildfire risk, etc.).

2. It is understood that the boundaries of Significant Woodlands delineated within OPA 42 settlement properties will be respected and are not subject to change moving forward. In some situations, areas of Plantation, as defined by the Ecological Land Classification (ELC) system extend beyond the boundaries of what has been agreed in OPA 42 settlement, identified as Significant Woodland/NHS. These areas are not to be added to the Significant Woodlands, since these boundaries have been established through the OPA 42 settlement process.

OPA 80 Recommendation – within OPA 80, provide specific policy that allows for Plantations outside of the mapped NHS, including removal to be individually identified through the use of ELC.

‘Areas of Plantation, as delineated based on the Ecological Land Classification system, that are located outside the mapped NHS, within properties that have an OPA 42 settlement, will be considered Plantation, and subject to Plantation policies in the OP. Removal of Plantations will not require a Tree Inventory and a Vegetation Compensation Plan in accordance with the Private Tree Protection By-Law.’

Recommendation – include policy in OPA 80 the City needs to consider the financial impact of Plantation management for areas of Plantation that will become City owned. This should be considered as a financial line item in future City budgets.

We appreciate the opportunity to review and comment on OPA 80 and your time to review this letter and consider our recommendations. Should you have questions or concerns regarding the contents of this letter, please feel free to contact us to discuss this matter further.

Sincerely,
Natural Resource Solutions Inc.



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