

# Attachment-9 Departmental and Agency Comments

Table 1: Summary of Objections/Comments/Conditional Support and Issues/Concerns

<b>Respondent</b>	<b>No Objection or Comment</b>	<b>Conditional Support</b>	<b>Issues/Concerns</b>
<b>Planning</b>	N/A	N/A	Planning staff are concerned that the proposed use does not comply with the Official Plan or the Provincial Planning Statement, particularly in regard to the proposed commercial use in employment lands.
<b>Engineering</b>	N/A	N/A	Engineering staff have noted a number of concerns with the submitted materials. In particular, engineering staff have identified concerns with the submitted Functional Servicing Report and Stormwater Management Report.  Engineering staff do not support approval of the application until their concerns have been addressed.*
<b>Urban Design and Landscape Planning</b>	N/A	N/A	Comments will be addressed prior to site plan approval.*
<b>Environmental Planning</b>	N/A	N/A	Please revise Stormwater Management Report to reflect the infiltration criteria identified within the City's Development Engineering Manual.*
<b>Parks Planning</b>	No objection	Yes*	Comments will be addressed prior to issuance of a building permit.

\*Memo or letter attached

# Internal Memo

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Date April 24, 2025  
To **Eric Rempel, Development Planner**  
From Michelle Thalen, C.Tech  
Engineering Technologist III  
Service Area Infrastructure, Development and Enterprise Services  
Department Engineering and Transportation Services  
**Subject 81 Royal Road  
Submission 1**

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The comments below are a compilation from various city staff and departments, and are based on the following plans & reports:

- Functional Servicing and Stormwater Management Design Report (FSR) – prepared by GEI Consultants; dated December 13, 2024
- Site Grading Plan (SGP) - prepared by GEI Consultants; dated January 30, 2025
- Site Servicing Plan (SSP) - prepared by GEI Consultants; dated January 30, 2025
- Phase 1 Environmental Site Assessment – prepared by JLP Services Inc; dated December 23, 2024
- Phase 2 Environmental Site Assessment – prepared by JLP Services Inc; dated April 1, 2025
- Traffic Impact Study (TIS) - prepared by Transplan Associates; dated January 2025
- Traffic Geometric Plan (TGP) – prepared by GEI Consultants; dated January 30, 2025
- Site Plan – prepared by BJC Architects + Associates Inc.; dated January 24, 2025

## **Development Engineering:**

### **Municipal Services:**

#### Water capacity

- FSR identified in section 2.1 of the report that the “water supply is proposed to be provided via the extension of a 200mm diameter watermain”. It is to be noted that the municipal watermain on Royal Road is not proposed to be

Figure 2: Engineering Comments 2 of 4

extended, rather than the property would be supplied via a 200mm water service. Please update the FSR accordingly to ensure clarifying language for the proposal.

- The FSR in section 2.1 identifies anticipated water demand from the site however does not state the source for the data used. The FSR should be updated to provide watermain design demand calculations based on the City's Water Supply Master Plan – refer to section ES-4 "Water Demand Projections" and the fire flow should be based on the Fire Underwriters Survey current issue of "Water Supply for Public Fire Protection" as specified in the Design Guidelines and Supplemental Specifications for Municipal Services (DGSSMS). Provide all calculations as necessary.

#### Wastewater capacity

- FSR identified in section 2.2 of the report that the "sanitary service for the site will be provided by a 200mm diameter sanitary sewer extended southwest to the existing 300mm diameter sanitary sewer on Royal Road.". It is to be noted that the municipal sanitary sewer on Royal Road is not proposed to be extended, rather than the property would be supplied via a 200mm sanitary service. Please update the FSR accordingly to ensure clarifying language for the proposal.
- Section 2.2 and Appendix A of the FSR have calculated the sanitary flow rates of the site based on commercial design flows however the proposed rezoning application is to change the site from industrial zoning to a site specific industrial zone and not commercial as calculated. As such, the FSR is to be updated using the rates for the proposed zoning and further that the sanitary design flows utilize the MECP "Design Criteria for Sanitary Sewers, Storm Sewers and Force mains for Alterations Authorized Under An Environmental Compliance Approval" (May 21, 2023) as identified in the City's DEM – refer to section 5.6.2. Clearly identify the design flows being used within the Sanitary Sewer Design Sheet (Appendix A). Upon resubmission, Engineering staff will proceed to check the City's model of the sanitary sewer system to ensure adequate and available capacity in keeping with the City's Zoning Bylaw.

#### **Stormwater Management:**

- Section 4 of the FSR is to be updated to provide a reference for the annual precipitation used for water balance. Local datum for Guelph should be used from the website "Canadian Climate Normals" – Government of Canada.
- The SWM criteria specifies that 5mm of volume control is required and the City's Development Engineering Manual (DEM) specifies that development "maintain predevelopment recharge rate, volume and hydroperiods at post development conditions" – refer to section 5.7.6. The water balance provided within the FSR does not reflect these criteria. The site SWM is to incorporate Low Impact Design features including infiltration where appropriate.
- Section 4 of the FSR states that it is assumed that the underlying groundwater is shallow and the soils are "tight" so infiltration cannot be incorporated into the SWM design. There is no provided data to back this assumption up. Information about groundwater depth and geotechnical

Figure 3: Engineering Comments 3 of 4

analysis is to be completed for this application to support the proposed SWM design. During preconsultation with the applicant (April 2023), a geotechnical report was identified by Engineering staff to be provided for submission. The FSR should identify the property's conditions (geotechnical, topographical etc) using data obtained to confirm how the design meets City SWM criteria and not use assumptions for the basis of the preliminary design.

- The MIDUSS and water balance should reflect the existing impervious conditions of the site which includes the existing gravel driveway for both the predevelopment and the post development conditions. Update accordingly.
- Any SWM quality control devices are to be ETV certified – refer to section 5.7.3 of the DEM. Confirm this compliance within the FSR.

## **Transportation Services:**

Transportation Services staff have reviewed the application for Official Plan Amendment and Zoning By-law Amendment formal submission. Staff are generally supportive of the proposed development and offer the following comments:

### **Sidewalk**

The proposed municipal sidewalk fronting the development on Royal Road is provided from the development's driveway access and connecting to the existing multi-use pathway on Woodlawn Road West. Please extend the new sidewalk for the entire development frontage on Royal Road and depict the on the site plan.

### **Driveway access**

Based on the proposal, limited clear throat length is provided. Proposed driveway access must be designed with sufficient clear throat length in accordance with Transportation Association of Canada (TAC) Geometric Design Guideline for Canadian Roads.

To provide additional clear throat length, remove the first few parking spaces immediately east of the proposed driveway.

### **Sight triangle**

As per City's zoning By-law, on a corner lot in any zone, no building, structure, play equipment, statue, swimming pool, hot tub or parked motor vehicle may be located within the sight line triangle formed by joining the point of intersection to points on each street line, measured 9 metres from that point of intersection.

The site plan has proposed a pylon sign within the sight triangle and the sign is to be relocated outside of the sight triangle.

### **Transportation Demand Management**

Detailed design of sustainable transportation features, such as bike parking, electric vehicle parking and pedestrian connections can be discussed at the site plan stage. Note that the City of Guelph 2023 Comprehensive Zoning Bylaw includes requirements for bike parking and electric vehicle parking that will apply to this development, including provision of both short-term and long-term bike parking facilities within the site.

### **Traffic Impact Study (TIS)**

Staff generally agree with the findings of the Traffic Impact Study. A technical memorandum must be provided to address the following items:

Proposed driveway access to the development only identifies a smaller clear throat length area. As part of the TOR correspondence with the City, clear throat analysis was requested at the access in accordance with the TAC. However, the TIS is missing the clear throat analysis at the access.

Section 7.1 TDM Measures notes that the “development, being an industrial supply outlet specializing in sale of automobile parts, tools, and other heavy equipment, is unlikely to attract customers arriving by bicycle or on foot for purchases”. However, there are employees who may be commuting to the proposed development by bicycle. Sufficient long term secure bike parking in accordance with the Zoning By-law must be provided to proposed development.

Editorial errors: Appendix A2 Transit Data incorrectly identifies the municipality as Mississauga.

### **Environmental Engineering:**

Environmental Engineering staff have reviewed the Phase One and Two Environmental Site Assessment (ESA) reports submitted for the subject development application and completed by JLP Services Inc. dated December 23, 2024 and April 1, 2025, respectively. The comments below reflect the requirements identified in the City’s Guidelines for Development of Contaminated or Potentially Contaminated Sites, 2016 (Guidelines):

#### Comments

1. The Phase One and Two ESA reports indicated they completed in accordance with the Canadian Standards Association (CSA) Z768-01 (R2022) and Z769-00 standards, respectively.
2. The Phase One ESA report identified Potentially Contaminating Activities (PCAs) that contributed to Areas of Potential Environmental Concern (APECs)
  - Railroad tracks adjacent to the Site and various industrial manufacturing surrounding the Site were identified to pose a potential concern to soil and/or groundwater at the Site.
3. The Phase Two ESA report investigated both the soil and groundwater associated with the identified APECs with results found meeting the appropriate Table 2 standards.
4. A reliance letter was not provided for either report.

#### Requirements

The Owner/Developer will be required to fulfill the following conditions prior to Zone Change approval:

- Provide a reliance letter for both the Phase One and Phase Two ESA reports. [Section 3.6 of the Guidelines]

### **Staff Recommendations:**

Please have the reports and plans updated as per the comments above.

## Internal Memo

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Date April 22, 2025  
To **Eric Rempel**, Planner II  
From Prerit Kaji, Planner II- Development and Urban Design  
Service Area Infrastructure, Development and Enterprise Services  
Department Planning Services  
**Subject 81 Royal Road, Zoning By-law Amendment Application – OZS25-004**  
**Urban Design and Landscape Comments**

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Urban Design staff has the following comments based on the:

- Planning Justification report dated February 2025 from Agora Group;
- Site Plan, Elevations-Renderings dated January 2025 from BJC architects + assoc.;
- Landscape Plan and details dated November 2024 from Aboud and Associates Inc.;
- TPP dated February 2025 from Aboud and Associates Inc.;

### Background

Urban Design policies from the Official Plan were reviewed. The City has approved the Commercial Built Form Standards. The comments below also reflect the review of these documents.

### Urban Design Comments

Concept Plan/ Building block

- On preliminary review of the site plan, staff finds the overall submitted concept, displays lack of architectural expression on the building block facing Woodlawn Road.
- This elevation features a large, uninterrupted wall without fenestrations, details, or design elements, which diminishes its potential and fails to establish a welcoming or functional relationship with the street edge.
- Staff would like the applicant to consider other alternatives of activating the north elevation facing Woodlawn Road. Below are few different approaches for the applicant to consider to enable an active and successful street edge-
  - Redistribute Surface Parking- Staff suggests relocating some portions of the surface parking area between Woodlawn Road and the building. This adjustment could allow for the creation of an additional building

- entrance that directly addresses the street frontage. Mirroring the design approach observed on the east elevation, which demonstrates a more inviting relationship with the street, this change could improve pedestrian accessibility and enhance the building's overall presence. Moreover, it increases the building setback from Woodlawn Road to help reduce the visual dominance of the blank wall and provide an opportunity for landscaping, public seating or other softscape features that can soften the impact of building mass on street edge.
- Reorient the building block- Rotate the building so that the proposed entrance façade of the building is facing Royal Road and move the principal entrance closer to the Woodlawn Road frontage. Enhance the north-west corner of the building by adding height and incorporating glazing that ensures visibility from Woodlawn Road. This will provide opportunity for a small parking area directly in front of the principal entrance and also establishing strong visual and pedestrian connectivity to Woodlawn Road.
- Please refer to Commercial Built Form Standards, Section 9- Large Commercial Sites, where sub-section 9.3 and 9.4 elaborates on the ground floor and street edge design as well as articulation, façade design and materials required for buildings facing a public street.

## Landscape

- Staff recognize the proposed removal of existing trees within the requested rezoned area of site that consist of mostly Poplar, White Willow and Black Locust, and those trees to be protected and preserved within the portion of the site to remain in the existing zone. The majority of the trees to be removed are in good health and will require compensation.
- Tree #1 which is a City owned tree in poor health can be removed, however Tree #2 is in good condition and shall be protected. Please adjust proposed engineering infrastructure.
- Of the 38 trees proposed for removal, there are two trees that will be exempt due to health and species. The remaining 36 trees have a total DBH of 1943cm. Using the Aggregate Caliper Formula of the Tree Technical Manual - that is equal to 323 new trees to be planted on site. Please consider this when revising the Landscape Plan as part of a formal application. Staff will consider a combination of new trees on site and cash in lieu as the development application evolves.
- As part of a formal Site Plan Application, please ensure to submit an Arborist Report along with the TIPP plans. This report should include information/inventory regarding site trees (health, condition, species, etc), as well as specifying measures required for protection, mitigation of tree injury and monitoring efforts, as per the City's Tree Technical Manual.

Figure 7: Urban Design and Landscape Planning Comments 2 of 4

- Please provide a revised Landscape Plan prepared and stamped by a full member of the OALA as part of a formal site plan application that reflects the recommended changes and requirements provided by City staff.
- As per the Tree Technical Manual: Medium stature trees should have access to a minimum soil volume of 18m<sup>3</sup>. Larger stature trees may require soil volumes up to 30m<sup>3</sup> per tree. Best practices for securing long term tree health should be applied and adhered to.
- As per the Commercial Built Form Standards: 60mm caliper tree should be planted for every 8 parking spaces within the parking field or within 5 metres of the vehicle use area to help break up hard surfaces and minimize the heat sink effect (in addition to other on-site Landscaped Open Space tree planting requirements). For front yard tree planting, 1 medium or large stature deciduous front yard tree is required for every 10 metres of property frontage. These notes will help determine what proposed trees are considered as part of the compensation calculation and what are considered part of standard landscaping on site.
- Large surface parking areas should be divided into smaller and defined sections through the use of appropriately sized landscaped strips, islands and/or protected pedestrian walkways (OP Policy 8.12.5).
- Please provide a completed Sustainable Development Checklist as part of a formal application.
- The use of native species is strongly encouraged.
- The implementation of low impact development (LID) measures is encouraged (OP Policy 8.1.1).
- Site and Building design that reduces energy and water consumption, improves air quality, water quality and waste management is encouraged (OP Policy 8.1.1)
- Green roofs and blue roofs are strongly encouraged. A green roof, blue roof, or combination of both may count towards a maximum of 30% of the total landscaped open space requirement. A green roof allows vegetation to grow on top of a structure. Blue roofs allow for the capture and slow release of stormwater. Both provide environmental benefits and stormwater management.
- Landscaping treatments should contribute towards stormwater management (OP Policy 8.1.1). The use of bioswales and low impact development is encouraged. However, these systems should be placed where limited runoff from salt and/or snow storage may occur to reduce the impact to water quality.

### **Next Steps**

These comments represent Urban Design's and Landscape Planning review of the proposed development. More comments may be made upon review of revised submission materials.

Prepared by:

**Prerit Kaji,**

Planner II- Development and Urban Design

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# INTERNAL MEMO



DATE April 23, 2025

TO **Eric Rempel, Development Planner**

FROM Karen Reis, Environmental Planner

DIVISION Infrastructure, Development and Environment

DEPARTMENT Planning and Building Services

**SUBJECT 81 Royal Road – Proposed Zoning By-law Amendment – File:  
OZS25-004 – Review Comments**

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## **Proposal**

The application is for an Official Plan Amendment and Zoning By-law Amendment for the lands municipally known as 81 Royal Road to redesignate a portion of the subject lands from Industrial to Site-Specific Industrial and rezone a portion of the subject lands from "Industrial" (I) to a "Site-Specific Industrial" (B-XX) zone under City of Guelph Zoning By-law (2023)-20790, to permit the development of a Commercial Building.

## **Materials Reviewed**

Staff have reviewed the following reports for the submission for the above noted application including:

- Functional Servicing and Stormwater Management Report, prepared by GEI Consultants, dated December 2024
- Civil Servicing Plan, prepared by GEI Consultants, dated August 2024
- Site Plan, prepared by BJC Architects, dated January 2025

## **Comments**

- 1) Required: To support the nearby wetland and groundwater regime, the pre-development infiltration and run off rates must be matched through the stormwater management plan. Please update the Stormwater Management Design Report (Dec, 2024) to reflect the infiltration criteria identified within the City's Development Engineering Manual.

# INTERNAL MEMO

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Regards,

A handwritten signature in black ink that reads "Karen Reis".

**Karen Reis, BES**  
Environmental Planner

Infrastructure, Development and Environment  
**Planning Services**  
Location: City Hall

T 519-822-1260 x 2563  
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# Internal Memo



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Date April 17, 2024

To Eric Rempel, Development Planner II

From Tiffany Hanna, Park Planner

Service Area Public Services

Department Park and Trail Development

**Subject Official Plan and Zoning By-law Amendments  
81 Royal Road- OZS25-004**

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Park and Trail Development has reviewed the application for the above noted proposed Zoning By-Law and Official Plan Amendment including the Notice of Complete Application and Public Meeting dated March 27, 2025 and offers the following comments:

## **Zoning Bylaw Amendment and Official Plan Amendment:**

The purpose of the Official Plan and Zoning By-law Amendments application is to redesignate a portion of the subject lands from Industrial to Site-Specific Industrial and rezone a portion of the subject lands from "Industrial" (I) to a "Site-Specific Industrial " (B-XX) to permit the development of a Commercial Building.

Park and Trail Development has no objection to the proposed Zoning By-Law and Official Plan Amendment to permit the development of a the development of a Commercial Building.

## **Parkland Dedication**

Park and Trail Development recommends payment in lieu of conveyance of parkland for the development.

Payment in lieu of parkland conveyance will be required for this development in accordance with the Planning Act s.42 and the City of Guelph Parkland Dedication By-law (2022) 20717 or any successor thereof.

In accordance with the Planning Act s.42 the rate of payment in lieu of parkland conveyance will be 2% of the equivalent of Market Value of the land.

A narrative appraisal report of the subject property will be required to determine the Payment in lieu of Parkland amount, prior to submission of any building permit applications. As per Section 21 of Bylaw (2022) 20717 as amended (2024)-20860, the appraisal is only considered valid for one (1) year. The appraisal report shall be prepared by a qualified appraiser who is a member in good standing of the Appraisal Institute of Canada. The property owner is responsible for the cost and to arrange for the appraisal. We recommend

## Figure 12: Parks Planning Comments 2 of 2

submitting the appraisal two months ahead of the building permit application to avoid delays.

The amount of cash in lieu of parkland dedication will depend on the details of the approved development, parkland dedication rate in effect at the time of the issuance of the first building permit and the estimated market value of the land a day before issuance of the first building permit.

### Conditions of development

I recommend the following development approval conditions:

1. The Owner shall be responsible for **payment in lieu of conveyance of parkland** to the City to the satisfaction of the Deputy CAO of Public Services or their designate, pursuant to s. 42 of the Planning Act and in accordance with the City's Parkland dedication By-law (2022) 20717 or any successor thereof, prior to issuance of any building permits.
2. Prior to the issuance of the first building permit, the Owner shall provide to the Deputy CAO of Public Services or their designate, **a satisfactory narrative appraisal report** prepared for The Corporation of the City of Guelph for the purposes of calculating the amount for payment in lieu of conveyance of parkland pursuant to s.42 of the Planning Act. The value of the land shall be determined as of the day before the day the first building permit is issued. The narrative appraisal report shall be prepared by a qualified appraiser who is a member in good standing of the Appraisal Institute of Canada, and shall be subject to the review and approval of the Deputy CAO of Public Services or their designate.
3. Notwithstanding the foregoing, if the narrative appraisal provided by the applicant is not satisfactory to the Deputy CAO of Public Services or their designate, the City, acting reasonably, reserves the right to obtain an independent narrative appraisal for the purposes of calculating the amount for payment in lieu of conveyance of parkland.

### Summary

The above comments represent Park & Trail Development's review of the proposed development. Based on the current information provided, I would support the proposed development subject to the conditions outlined above.

Regards,

Tiffany Hanna, Park Planner  
Parks, **Public Services**

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