



September 10, 2021

Project No. 17205

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

Attention: Mayor Guthrie and Members of Council

**Re: Request for Comments on Clair-Maltby Secondary Plan**

- **Draft Clair-Maltby Secondary Plan (June 16, 2021)**
- **Comprehensive Environmental Impact Study (CEIS): Phase 3 Impact Assessment (June 16, 2021)**
- **Master Environmental Servicing Plan - MESP (June 18, 2021)**

**2143 and 2187 Gordon Street, Guelph**

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GSP Group represents the owners of 2143 and 2187 Gordon Street, known as 257590 Ontario Ltd. (the "Site").

As you are aware, our client, GSP Group, and our consulting team have been involved since the commencement of the Clair-Maltby Secondary Plan process. We have provided written submissions and feedback at critical stages in the process and participated in public and stakeholder sessions, including Council meetings.

We would note that we have previously submitted written comments for the Site including (but not limited to):

1. Letter to Council re: Clair-Maltby Conceptual Community Structure on December 1, 2017;
2. Letter and landowner concept plan for the Clair-Maltby Secondary on January 25, 2018;
3. Letter containing comprehensive comments related to the Draft Directions: Framework for the Clair-Maltby Secondary Plan Consultation Document on November 26, 2018) on January 10, 2019; and,
4. Letter on Clair-Maltby Secondary Plan: Phase 3 Project Update – Proposed Moraine Ribbon on June 21, 2019.

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Our client and consulting team have taken the opportunity to review the above-noted June 2021 documents and we have provided the following package of information to City planning staff for their consideration:

1. GSP Group response chart dated September 10, 2021.
2. NRSI letter dated September 9, 2021 and response chart, and other related documentation.
3. Stantec Consulting memo dated August 31, 2021.
4. MTE Consultants letter dated September 2, 2021.

The Fiscal Impact Assessment for the implementation of the Clair-Maltby Secondary Plan was just released on September 1, 2021, and therefore we will submit additional comments upon review of that documentation, as required.

However, in the meantime we believe the following areas that still need to be resolved and addressed with respect to our client's land and more broadly before finalizing the Secondary Plan and have grouped these under general areas/themes:

1. Natural heritage matters:

- From an ecological perspective, we are not in support of the proposed Moraine Ribbon as there is no technical basis or reasoning for inclusion in the Secondary Plan. GSP and NRSI have brought those issues to the attention of City staff previously and in our submission on June 21, 2019.
- Further refinements are required to the natural heritage features on the property including Significant Landform and Ecological Linkages and these requested refinements are shown on the draft OPA Schedules 4 and 4D (see mapping contained in NRSI submission).
- The proposed Gordon Street Multi-Use overpass is not required from a natural heritage perspective and has the potential to impact on the development of our client's Site when balancing other aspects such as grading and servicing and compatibility with surrounding land uses.
- There is no significant bat maternity colony habitat on the Site within the Natural Areas Overlay on Schedule E of the Draft Secondary Plan.
- Based on our consultant team review there is no Headwater Drainage Feature on the Site and it should be removed from Schedule E of the Draft Secondary Plan.

2. Cultural heritage matters

- The barn at 2187 Gordon is not considered part of a Cultural Heritage Landscape.
- Designation of built heritage features should not be considered through the Secondary Plan, but rather be considered through the subdivision approval

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process. This will allow for a full review of all matters for development including grading, servicing and compatibility with surrounding land uses.

- 2187 Gordon is a listed property on the City's Register and no additional policy layers are required outside of the policies in Section 4.8 of the Official Plan.
- We have concern of how Public Views and Vistas will be evaluated, managed and conserved.
- Concern with adopting recreation of architectural styles and design elements related to the historic rural setting.
- Development of taller buildings in the proposed High Density residential area near the front of 2187 Gordon will likely require significant changes to facilitate site servicing and therefore the policies need to be balanced to achieve other goals.

### 3. Engineering matters

- Where SWMF/SWCA's are used for recreational purposes, consideration should be given as parkland dedication.
- Development should be designed to accommodate areas of significant topography having regard for municipal requirements such as overland flows, depth of infrastructure needs and good engineering practice.
- Significant Landform policy needs to have more flexibility regarding grading and transition near this feature to achieve logical development of the Site.
- Moving our client's land to Phase 1 from Phase 2.
- Further review of the preferred sanitary servicing solution in the MESP is required and will be provided by our team.
- Review of proposed location of sanitary pump station SPS3 to Gordon Street servicing spine to be included in Phase 1.
- Location and size of stormwater facilities need to have flexibility with further study being completed at the draft plan of subdivision stage.
- Headwater drainage feature should be removed from the Site.
- Collector road cross section should be reduced from 27.5 metres to 24 metres.
- Gordon Street overpass not required and should be considered at-grade.
- Further review of MESP is still underway and further comments will be provided by our team, including review of the Financial Impact Assessment and implementation of future developments in logical and cost-effective manner.

### 4. Land Use Planning matters

- Request a detailed overall land budget that demonstrates how the target population of 16,300 people and 1,250 jobs will be accommodated within the secondary plan including a breakdown by unit types and density to confirm how growth and population targets will be met including how this meets a market-based housing mix.

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- Balance the protection of natural heritage and cultural heritage with accommodation of future land use and servicing, including grading.
- One-sided roads and roads located adjacent to natural heritage areas should be avoided.
- As noted above, the Moraine Ribbon is not based on science and not required to protect the natural environment.
- Trails can be accommodated in natural heritage buffers where appropriate.
- Trails outside natural heritage areas and urban square should be counted toward parkland dedication.
- Support a modified grid road pattern including direct connections to Gordon Street and service roads where appropriate and required to support high density or mixed-use development, including the promotion of local connections e.g. north-south collector road system.
- We do not support the inclusion of two collector roads in the Urban Village Core and suggest one collector road running east-west across Gordon Street supported by a modified road grid pattern and a north-south collector road. This was supported in our Landowner Concept submission in January 2018. Further comments on this matter will be submitted as required.
- Support smaller cross-section for a collector road.
- Consider regulating height for High Density/Mixed-use by Floor Space Index (FSI), rather than a combination of FSI and maximum height to achieve a better urban form.
- Design Review Committee is not required.
- Development Charges By-law should be updated to support and implement the Clair-Maltby Secondary Plan.
- City should consider front ending agreements through the Development Charges Act.
- Combining Phase 1/2 infrastructure projects and proceed with Development Charge related projects between 2023 to 2025.
- We are concerned with current proposed policy under 11.3.9.4.2 and suggest that wording for financing and phasing be more flexible to guide development.
- The policies should encourage, but not require, landowners in the Secondary Plan to enter into front ending agreements.

We recognize and appreciate the level of effort to get to this stage in the Clair-Maltby Secondary Plan process and look forward to further discussions with City staff in the refinement of the Secondary Plan. We are happy to meet with City staff to further elaborate on our comments and to discuss possible options and changes in land use direction and policies as appropriate.

Thank you for the opportunity to comment. Should you have any questions in the meantime, I can be reached in our Kitchener office either by email or my direct line at 226-243-7296.

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Yours very truly,  
**GSP Group Inc.**



Hugh Handy, MCIP, RPP  
Senior Associate

cc Stacey Laughlin, Senior Policy Planner, City of Guelph  
Brad Trussler and Alex Drung, 2575950 Ontario Ltd.