



September 16, 2021

Project No. 14143

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)**

1912 Gordon Street, Guelph

GSP Group represents the owners of 1912 Gordon Street (the “Property”).

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 Property including (but not limited to):

1. Letter to Mayor/Council on December 1, 2017 re: Clair-Maltby Conceptual Community Structure;
2. Letter to Stacey Laughlin and landowner concept plan for the Clair-Maltby Secondary on January 25, 2018;
3. Letter to Stacey Laughlin on April 6, 2018 re: Clair-Maltby Secondary Plan – Planning and Design Charette - Preliminary Preferred Concept – April 5, 2018; and,
4. Letter to Stacey Laughlin 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.

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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. NRSI letter and response chart dated August 31, 2021; and.
2. GSP Group response chart dated September 10, 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:

Please refer to the NRSI response chart dated August 31, 2021 for complete details. Highlights are noted below:

- Further clarification and refinements are required in relation to Significant Landform, Significant Wildlife Habitat/Ecological Linkages and the Clair-Maltby Monitoring Plan.
- Not in support of the proposed Moraine Ribbon as there is no technical basis or reasoning for inclusion in the Secondary Plan.
- A small lobe of Significant Natural Area shows up on Map NH-11 as part of the Refined NHS along the south side of the property boundary near the Linkage on 1968/1992 Gordon Street. This lobe extends east from the Significant Woodland. This appears to be a mapping error as the land under the lobe is farm field. There does not appear to be a source shown on the previous maps to indicate why this area was added to the Significant Natural Area of the Refined Natural Heritage System (NHS). This lobe is shown on maps NH-11, NH-14A and NH-14B.
- Candidate Bat Maternity Colonies SWH has been broadly delineated throughout the Clair-Maltby study area. Suggest "candidate" habitats be removed from mapping until detailed assessment completed. The corresponding Natural Area Overlays that correspond to these features should also be removed.

2. Land Use Planning matters

The draft Secondary Plan has the front portion of the Site in the "Gordon Street Corridor" and designated a combination of "Medium Density Residential" and "Low Density Greenfield Residential". We met with City staff on January 27, 2020 and shared a concept for High Density residential use on the entire Property, including the adjoining

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properties on Gordon Street (1906 and 1924 Gordon Street). We believe that given the surrounding land uses (including the extensive natural heritage area to the south), proximity to the Clair-Gordon node and the fact this Property sits in Phase 1 for servicing in the Secondary Plan that it provides an excellent opportunity for greater density than is currently proposed in the Secondary Plan. We would appreciate staff reviewing the proposed designations and suggest a High Density designation would be more appropriate.

There is an existing barn located on 1912 Gordon Street noted in Section 11.3.4.1 (page 14) of the Draft Clair-Maltby Secondary Plan. We are concerned about retaining an agricultural barn within a future development area given the size of the structure and potential re-use of a large agricultural building. We would appreciate further dialogue on this matter with City staff and suggest that no designation take place at this time in absence of the development plan for the Property.

In addition to the above comments, please refer to the GSP response chart dated September 10, 2021 for additional comments and details. Highlights are noted below:

- 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.
- 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.

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- 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.

Yours very truly,
GSP Group Inc.



Hugh Handy, MCIP, RPP
Senior Associate

cc Dave Jassal