



SHAPING GREAT COMMUNITIES

October 8, 2021

Project No. 12130

Submitted via email only to [clerks@guelph.ca](mailto:clerks@guelph.ca)

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

Attention: Mayor Cam Guthrie and Members of Council

**Re: Shaping Guelph – Official Plan Update (Municipal Comprehensive Review)  
Strategic Growth Area - Clair Road East  
331 Clair Road East, Guelph**

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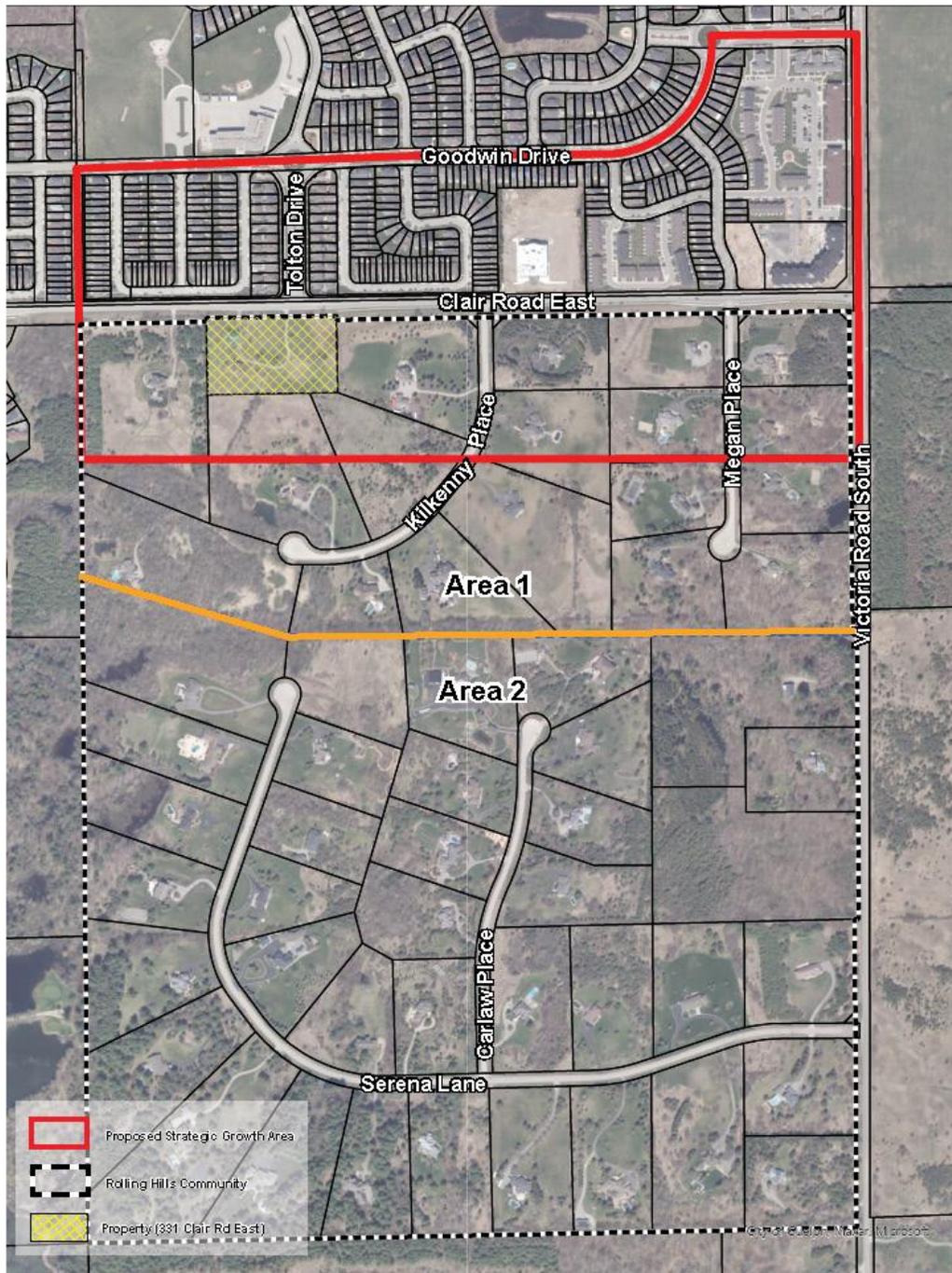
GSP Group (“GSP”) acts as planning consultants for the owners of 331 Clair Road East - the “Property” (2488995 Ontario Ltd. and Reid’s Heritage Homes Ltd. – the “Owners”). The Property is part of the South Clair Road Neighbourhood Association. We are in **support** of the Strategic Growth Area along a portion of Clair Road East and the proposed residential land use designations in Area 1 as presented by staff.

GSP has represented the Owners of the Property since 2011 related to land use planning matters. The Property is approximately 1.6 hectares (4.1 acres) in size and fronts onto the south side of Clair Road East (see map below).

The property contains an existing vacant stone heritage home and accessory shed. The Property has a driveway access opposite Tolton Drive. The Property sits with Rolling Hills area but is not legally part of the Rolling Hills subdivision (i.e. a separate lot surrounded on three sides by estate residential lots in the subdivision).

PLANNING | URBAN DESIGN | LANDSCAPE ARCHITECTURE

72 Victoria Street South, Suite 201, Kitchener, ON N2G 4Y9 519 569 8883  
162 Locke Street South, Suite 200, Hamilton, ON L8P 4A9 905 572 7477  
[gspgroup.ca](http://gspgroup.ca)



GSP has reviewed and participated in the Shaping Guelph process since the commencement in 2019. We also participated in a virtual meeting focusing on the Rolling Hills area on April 20, 2021, which highlighted growth options and urban structure for the City and land uses specifically for Rolling Hills.

We offer the following land use planning background and comments below for consideration by Council and City staff.

### **Land Use Planning Background**

In June 2012, GSP Group on behalf of the Owners submitted an Official Plan Amendment and Zoning By-law Amendment on behalf of the Owners to permit 60 cluster townhouse development (the “Applications”) including the retention of the stone heritage home on the Property.

The Applications requested a redesignation of the Property from “Reserve Lands” to “General Residential” (2001 Guelph Official Plan) and to amend from the former Township of Puslinch Zoning By-law A-2 Specialized Agricultural zone to an R1.A (Specialized Residential Single-Detached zone and a R3.1 (Specialized Residential-Townhouse) zone, with site specific regulations under City of Guelph Zoning By-law 19/85.

City Council did not make a decision on the Applications within the time periods in the Planning Act and the matter was appealed to the OMB by the Owners. The OMB Case No. is PL140028 which was heard in March 2015.

Ultimately, the OMB concluded the Applications were premature until the completion of the Clair-Maltby Secondary Plan. While the Applications were made prior to the approval of OPA 48, at Paragraph 64 of the OMB decision it states:

*The Board observes that the Clair-Maltby secondary plan process noted at s.9.10.3 of OPA 48 demonstrates the City’s intention to postpone the development of the Reserve Lands in this area until other land use designations are considered through a secondary plan.*

In the meeting notice for the April 20, 2021, in the “Shaping Guelph Town Hall Invitation for the Rolling Hills area” it stated:

*Growth options for the Rolling Hills community were originally being considered through the city’s in progress Clair-Maltby Secondary Plan (CSMP). In 2018, the boundary of the CSMP was amended to remove Rolling Hills community and future growth and land use for Rolling Hills was referred to the city’s municipal comprehensive review.*

Accordingly, the future growth options and land use for Rolling Hills as noted above was moved to the City’s Municipal Comprehensive Review of the Official Plan – i.e., Shaping Guelph.

## **Land Use Planning Comments**

In May 2019, the Province released A Place to Grow: Growth Plan for the Greater Golden Horseshoe (APTG). Amendment 1 to APTG was approved with an effective date of August 28, 2020. APTG guides growth and development within the Greater Golden Horseshoe over the next 30 years. In part the APTG requires the City to establish an updated urban structure, including the delineation of strategic growth areas (SGAs) (formerly intensification areas).

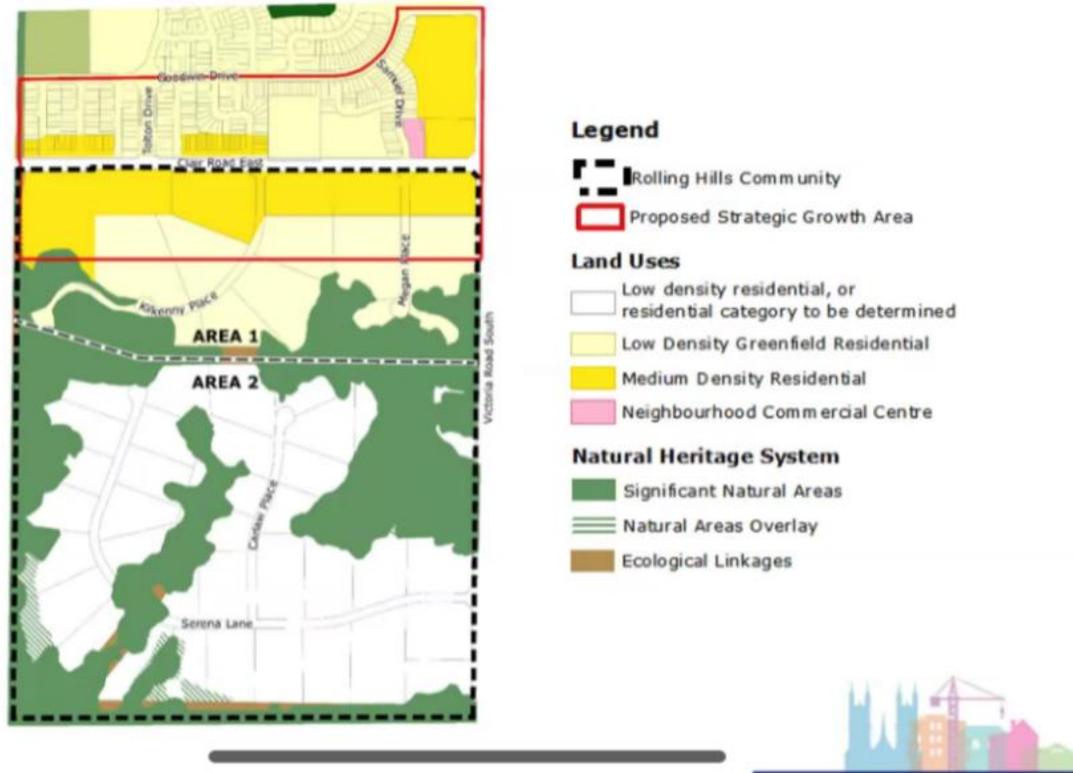
APTG defines Strategic Growth Areas:

*Within settlement areas, nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.*

An Information Report from City was presented to City Council on April 9, 2021, regarding proposed growth scenarios and urban structure for the City. Figure 3 of City of Guelph Official Plan Review - Urban Structure Technical Brief dated March 2021 (page 153 of the agenda) indicated the area along both sides of Clair Road East roughly between the east side natural area of the Dallen subdivision to Victoria Road South was proposed as a Strategic Growth Area.

The staff/consultant presentation on April 20, 2021, for the Rolling Hills area included the following slide (see below).

## Rolling Hills – growth options



This slide shows the Strategic Growth Area including an Area 1 and Area 2 in the Rolling Hills subdivision. The Property (i.e., 331 Clair Road East) lies within Area 1. Area 1 also includes proposed designations of Medium Density Residential on 331 Clair and for other properties general along the south side of Clair Road East. Area 1 also includes proposed Low Density Greenfield Residential designations to the south of the Medium Density Residential area. Area 1 also includes the continued designation of the Significant Natural Areas.

We are in support of the Strategic Growth Area along a portion of Clair Road East and the proposed residential land use designations in Area 1 for the following reasons:

1. **Within the Built-Up Area**

331 Clair and Rolling Hills subdivision have been in the Built-Up Area since the approval of OPA 39 which was delineated under the 2006 Growth Plan for the Greater Golden Horseshoe. The 2008 Local Growth Management Strategy (“LGMS”) was the background report for OPA 39. The LGMS contained a map which identified a range of 226 to 489 residential units general in what we are now terming “Area 1” above. Accordingly, Area 1 was considered for growth and intensification as part of the previous conformity exercise.

APTG now requires a minimum of 50 per cent of all residential development occurring annually in the City of Guelph delineated built-up area. The current target in the Official Plan is 40 percent and is to be updated through the Municipal Comprehensive Review.

Intensification of Area 1 along Clair Road East would allow for distribution of growth within other areas of the City and not just along the Gordon Street corridor for instance.

2. **Existing and Proposed Land Use**

The proposed Medium Density and Low Density Greenfield uses in Area 1 would generally be in keeping with the residential uses, density and height established in the Westminster Woods subdivision on the north side of Clair Road East.

3. **Protection of the Natural Heritage System**

The Natural Heritage System in the currently Official Plan between Area 1 and Area 2 would remain protected and act as a buffer and natural separation between proposed residential intensification in Area 1 and the estate residential lots in Area 2. Pedestrian and cycling linkages could be explored to encourage connection between Area 1 and 2, subject to the Natural Heritage System policies in the Official Plan.

4. **Existing and Future Road Network and Bus Routes**

Clair Road East is an Arterial Road in the Official Plan. It is also currently a truck route. It is also ultimately planned to be widened to four (4) lanes with cycling lanes between Dallon Drive and Victoria Road South. Development and intensification along Clair Road East in Area 1 could have direct access to a major transportation route. There is also a current bus route running along Goodwin Drive in proximity to the proposed Strategic Growth Area to the north.

5. **Existing and Future Municipal Infrastructure**

Development could potentially be serviced through existing municipal infrastructure in the Westminster Woods subdivision, as well as future infrastructure to service the broader community including the Clair-Maltby Secondary Plan area.

6. **Proximity to Gordon/Clair node and other amenities**

The Strategic Growth Area is within walking distance of the Gordon/Clair Mixed-use Centre for a range of commercial and services, including a public library. There are also 3 elementary schools within Westminster Woods subdivision as well as a numerous parks and trail system. All of these aspects create a very walkable neighbourhood.

Further we would anticipate further park(s) and common areas to be developed on the south side of Clair Road East in the proposed Strategic Growth Area.

Accordingly, based on the above-noted land use planning background and commentary, we believe the inclusion of a Strategic Growth Area along Clair Road East and the proposed Medium Density Residential and Low Density Greenfield Residential designations in Area 1 are logical and appropriate.

Thank you for the opportunity to comment. I would be happy to meet with City staff to discuss our comments. Should you have any questions in the meantime, I can be reached in our Kitchener office either by email at [hhandy@gspgroup.ca](mailto:hhandy@gspgroup.ca) or my direct line at 226-243-7296.

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

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP  
Senior Associate

cc Krista Walkey, City of Guelph  
Stacey Laughlin, City of Guelph  
Jeff Robinson and Kevin Fergin, 2488995 Ontario Ltd./Reid's Heritage Homes  
Pete Graham, GWD Developments Ltd.  
Trent Johnson/Eric Davis, Miller Thomson LLP