

October 9, 2020

**Via E-Mail**

Stacey Laughlin  
Senior Policy Planner  
City of Guelph  
Planning and Building Services  
1 Carden Street  
Guelph, ON N1H 3A1

**John S. Doherty**  
Direct +1 519 575 7518  
Direct Fax +1 519 571 5018  
john.doherty@gowlingwlg.com  
File no. K0561580

Dear Ms. Laughlin:

**Re: Our Client: Mayflower Properties Inc.  
York Road and Elizabeth Street Land Use Study**

We are counsel for Mayflower Properties Inc. ("**Mayflower**"), owner of property at 256 Victoria Road South and 351 Elizabeth Street, Guelph, upon which our client, Polymer Distribution Inc. ("**PDI**"), operates its rail to truck bulk trans-loading terminals and warehouse. We are writing with respect to your land use study and urban design concept plan for the York Road / Elizabeth Street area ("**Study**").

Our client has serious concerns with deficiencies in the Study as detailed in the correspondence noted below including as regards:

- Inadequate Consideration of the D-Series Guidelines;
- Failure to Include Surrounding Land Uses in the Study Area;
- Exclusion of 200 Beverley Street (IMICo) from the Study;
- Failure to Recognize Existing Employment Uses;
- Class 4 Designation Under to NPC-300; and
- Transportation (Trucking Routes and the Guelph Junction Railway).

Please find enclosed the following materials for your review and comment:

- 1) Letter from Richard Standish, President of PDI dated October 9, 2020; and
- 2) Letter from Chris Pidgeon of GSP Group dated October 9, 2020

Please keep the writer, our client and Mr. Pidgeon notified of all steps in regards to the Study process and any public meetings regarding the Study.

We would be pleased to set up a call or meeting to discuss. We look forward to hearing from you.

Yours very truly,

Gowling WLG (Canada) LLP



John S. Doherty

JSD:mr  
Encl.

cc: Client



Polymer Distribution Inc.  
256 Victoria Road  
Guelph ON N1E 5R1  
519-837-4535 x226



October 8, 2020

City of Guelph  
Planning and Building Services  
1 Carden Street  
Guelph, ON N1H 3A1

Attn: Ms. Stacey Laughlin, MCIP, RPP  
Senior Policy Planner

**Re: York Road and Elizabeth Street Land Use Study and Urban Design Concept Plan  
Background Report Comments  
Mayflower Properties Inc. (PDI)**

Dear Ms. Laughlin,

I am the President of Polymer Distribution Inc., known as "PDI". We operate four locations in Guelph, including our head office on 256 Victoria Road South. We were recently made aware that the City is proposing potential major land use changes in the vicinity of our head office and our location on 351 Elizabeth Street. We have retained GSP Group (c/o Mr. Chris Pidgeon) and Gowlings WLG (c/o Mr. John Doherty) to assess the City's Background Report on the York Road and Elizabeth Street Land Use Study, and would like to take the opportunity to make staff and Council aware of our operations in Guelph.

We are a privately owned, full-service bulk trucking company that operates rail to bulk truck trans-loading terminals, warehousing, and packing, servicing the chemical, polymer, and food industries. We began in 1988 in Milton and have since expanded to 13 municipalities across Canada where we operate 17 locations. We moved to Guelph in 2002 and now have four sites in Guelph, including our Corporate Head Office. PDI has one of Canada's largest bulk trucking fleets and are the largest private owner of rail terminals in Canada.

Our four locations in Guelph employ 155 people and our operations are heavily dependent on the City's trucking routes and railway, specifically the Guelph Junction Railway. We are the largest user of the GJR requiring approximately 14 rail car deliveries per day. This results in an expenditure of over \$0.5 million for railway access each year, which is owned by the City. In addition to our contributions to the railway, PDI pays \$550,000 annually in municipal taxes, with an overall investment of \$47 million in the four sites in Guelph.

Our equipment is operated 24 hours a day, 7 days a week, in accordance with our Environmental Compliance Approval (previously called a Certificate of Approval).

We are a great corporate citizen with an excellent rating for environmental compliance with the Ministry of Environment, Conservation and Parks. We are members of the Canadian Association of Chemical Distributors and adhere to the "Responsible Distribution" Code of Practice that seeks to reduce incidents that would harm people or the environment. We are the only bulk trucking company that is ISO 9001:2015 certified for all aspects of our business, including trans-loading, packing, warehousing, and delivery.

We have invested over \$9 million into our sites on Victoria Street South and Elizabeth Street, including installation of spur lines that are used for rail transport. We have no plans to move either location. Both sites are well suited to PDI's rail and trucking needs and our investments have ensured that each site can operate many years into the future. As our company's head office, our site on Victoria Street South is of particular importance to the company.

We are concerned that our operations and opportunities for expansion at our two sites within and near the York Road and Elizabeth Street Land Use Study area have not been considered in the Background Report or Land Use Compatibility Study. Although we strive to be good neighbours, the introduction of sensitive land uses near our locations will result in inevitable complaints from residents. We understand that the City is seeking to establish residential uses on 200 Beverley Street and has already introduced or enhanced residential permissions near our Elizabeth Street site through Official Plan Amendment 69 and the Guelph Innovation District Secondary Plan. We strongly object to the further encroachment of residential uses that will impact our ability to operate and expand.

We respectfully request that further planning studies for this area consider the impacts of sensitive land uses on our operations and that we be notified at the earliest opportunity of any potential land use changes, whether publicly or privately initiated, within 1,000 metres of our sites in Guelph. Please send all correspondence to me via email ([richard@pdibulk.com](mailto:richard@pdibulk.com)) as I am concerned important notifications may be misdirected if mailed. Please also copy Mr. Pidgeon and Mr. Doherty.

Thank you for the opportunity to discuss this matter. If you would like more information on PDI's operations in Guelph please do not hesitate to contact me.

Sincerely,



Richard I Standish  
President, Polymer Distribution Inc.

cc: John Doherty, Gowling WLG  
Chris Pidgeon, GSP Group Inc.



October 9, 2020

File No. 20155

City of Guelph  
Planning and Building Services  
1 Carden Street  
Guelph, ON N1H 3A1

Attn: Ms. Stacey Laughlin, MCIP, RPP  
Senior Policy Planner

**Re: York Road and Elizabeth Street Land Use Study and Urban Design Concept Plan  
Background Report Comments  
Mayflower Properties Inc. (Polymer Distribution Inc.)**

Dear Ms. Laughlin,

We are the planning consultants for Mayflower Properties Inc., the owner of Polymer Distribution Inc. ("PDI"). PDI operates manufacturing and distribution as a value-added component in the polymer, chemical, and food industries. This includes the loading and distribution of liquid chemicals, pellet manufacturing and distribution by rail containers and transport tankers, and on-site storage in bulk warehousing and silos. PDI owns and operates four locations in Guelph: 256 Victoria Road South, 351 Elizabeth Street, 240 Massey Road, and 265 Massey Road. One of these locations, 351 Elizabeth Street, is within the boundary of the York Road and Elizabeth Street Land Use Study ("York / Elizabeth Study"), and a second at 256 Victoria Road South is proximate to the York / Elizabeth Study Area and has the potential to be impacted by land use changes resulting from the Study (**Figure 1**).

We have reviewed the Background Report and the appended Land Use Compatibility Study for the York / Elizabeth Study that was released for public consultation in September 2020. We thank staff for the opportunity to provide the following comments on behalf of our client:

#### Purpose of the Background Report and Summary of Concerns

It is our understanding that the intention of the York / Elizabeth Study is to examine land use in the Study Area with the goal of attracting investment to the area through the introduction of higher-order land use designations, including residential and commercial. The purpose of the Background Report is to provide the historical and policy background research that will inform the City's future land use policies for the Study Area. As part of the Background Report, Dillon Consulting prepared a Land Use Compatibility Study (August 2020) that is appended to the Background Study.

We are concerned that the land use compatibility impacts of the existing industrial uses within the Study Area, including PDI, are not adequately addressed in the Background Study. Further, we

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believe the land use compatibility discussion must examine uses outside the Study Area that have potential impacts on the introduction of sensitive land uses, including PDI's location on Victoria Road South. Finally, we disagree that the IMICo site should be excluded from land use compatibility discussions as Council's vision for the IMICo site has potential negative impacts on established industrial uses, including PDI, that warrant a thorough investigation.

A detailed account of our concerns is discussed below.

#### Inadequate Consideration of the D-Series Guidelines

We agree with Dillon Consulting's conclusion that PDI's operation on 351 Elizabeth Street is a Class III Industry under the D-Series Guidelines. The D-Series Guidelines identify an "Area of Influence" of 1,000 metres around the circumference of the Site and recommend a Minimum Separation Distance of 300 metres from Class III industries to sensitive land uses. Dillon Consulting notes that the majority of lands within the Study Area are within the Minimum Separation Distance of at least one industry.

GSP Group has prepared a graphic (**Figure 2A**) that illustrates the 1,000 metre area of influence and the 300 metre buffer from PDI's site. It is our opinion that Figure 5 in Dillon Consulting's Report, being the "Relative Difficulty to Approve Sensitive Land Uses within the Study Area" graphic, should be amended to identify all lands within 1,000 metres in the area of influence and 300 metres of PDI's site (and PDI's second site discussed below) within the "Higher Anticipated Effort" category. This change will signify to Council and readers that PDI's Class III classification has significant impacts on potential sensitive land uses within 1,000 and 300 metres of each site, resulting in a high level of effort to demonstrate the compatibility of sensitive land uses.

#### Failure to Include Surrounding Land Uses in the Study Area

Both the Background Report and Land Use Compatibility Study do not consider land uses outside of the Study Area. PDI operates a second location outside of the Study Area at 256 Victoria Road South. While outside the Study Area, PDI's second site is also a Class III industry. As such, the D-6 Series Guidelines recommends a 1,000 metre Area of Influence and a 300 metre Minimum Separation Distance between PDI and sensitive land uses. As shown in **Figure 2B**, this 1,000 metre area of influence and 300 metre buffer extends well into the southern portion of the Study Area along York Road.

It is our opinion that industrial operations outside the Study Area are required to be included within the Report and Land Use Compatibility Study to fully understand the implications of future land use designations that may be recommended based on these studies. A complete compatibility analysis is not possible without including such uses and fails to provide Council and members of the public with complete information.

### Exclusion of 200 Beverley Street (IMICo) from the Study

200 Beverley Street, the former IMICo site, and PDI's site on Elizabeth Street are separated from each other by the approximately 20-metre wide corridor of the Guelph Junction Railway. The Background Study states: *"While the IMICO lands (200 Beverley Street) are within the Study Area boundary, the Council approved vision for the IMICO lands will not be re-examined. Rather the ongoing Memorandum of Understanding process will continue to provide direction for that site and this study will have regard for the vision and that process"* (pg. 4).

We have reviewed the available information on Council's vision for 200 Beverley Street, including the Memorandum of Understanding ("MOU") between the City, Habitat for Humanity Wellington, Dufferin, Guelph and ARGi R&D Inc. The MOU states that the vision for the site is redevelopment into an urban village that includes market-priced, affordable, and supportive housing residential units. While the Preliminary Development Scope of the MOU states that a number of items will be considered during the development of the concept plan for IMICO, compatibility with existing industrial uses is not listed. Compatibility or recognition of existing industrial uses is completely absent from the MOU.

As such, we are deeply concerned that the IMICO site has been arbitrarily excluded from the compatibility discussion in the Background Report and the Land Use Compatibility Study. Council's vision includes introducing sensitive land uses to the IMICo site, the entirety of which is within the 300-metre Minimum Separation Distance from PDI under the Province's D-6 Guidelines. In order to introduce sensitive land uses on the IMICo site, detailed land use compatibility studies must be completed that demonstrate that industrial impacts will not negatively effect the proposed residential use, and that the proposed residential use will not impact the operations of the industrial use. The protection of industrial users from encroachment of sensitive land uses is included in the Provincial Policy Statement (2020), Growth Plan for the Greater Golden Horseshoe, D-Series Guidelines, and the City of Guelph Official Plan.

It is our opinion that the introduction of sensitive land uses on any part of the IMICo site requires detailed examination to demonstrate compatibility with PDI's Class III industrial operations. While site-specific studies for IMICo are anticipated to be required as part of this exercise, these compatibility concerns need to be addressed within the context of the York / Elizabeth Study in order to provide a complete land use analysis. We are deeply concerned that Council's vision for the IMICo site does not account for PDI's ongoing operations on 351 Elizabeth Street, and are further concerned that this analysis has been explicitly excluded from the York / Elizabeth Study that is specifically focused on assessing land use compatibility in this area.

### Failure to Recognize Existing Employment Uses

As noted above, the protection of industrial users from encroachment of sensitive land uses is included in the Provincial Policy Statement (2020), Growth Plan for the Greater Golden Horseshoe, D-Series Guidelines, and the City of Guelph Official Plan. We are concerned that the Background Study



concludes that there are no employment uses in the Study Area: *“The Study Area does not currently have any designated employment areas, but does contain a variety of land uses that provide employment opportunities in the area”* (pg. 28).

The Provincial Policy Statement defines “Employment Area” as areas designated for clusters of businesses and economic activities including, but not limited to, manufacturing, warehousing, office, and associated retail. The Guelph Official Plan defines “Employment Area” using identical language. The majority of the Study Area is designated Industrial, Mixed Business, Mixed Office / Commercial, or Service Commercial. The Industrial and Mixed Business designations meet the Province’s and Official Plan’s definition for employment areas. As such, we agree with Dillon Consulting’s conclusion that much of the land within the Study Area is within an employment area in conformity with provincial and municipal policies. We would like to clarify that as a result the above-mentioned policies regarding the protection of employment uses apply and must be fully considered for all future land use planning decisions, including separation distances related to land use compatibility.

#### Class 4 Designation Under the NPC-300

We agree with Dillon Consulting that the Study Area is considered a Class 1 or Class 2 area under the N.P.C.-300 Noise guidelines. We also agree with Dillon Consulting that *“The majority of parcels throughout the Study Area are located within the Area of Influence and/or Minimum Recommended Setback Distance of at least one industrial property. Accordingly, any parcel that is intended for the development of a new sensitive use, including redevelopment, may be appropriate for a Class 4 designation. Detailed technical studies, reviewing specifics of industrial operations, are required to justify the use of a Class 4 designation”* (pg. 25).

We would like to emphasize that technical studies addressing noise generated by both PDI sites need to be completed prior to any change in land use within the Study Area and any consideration of a Class 4 designation under the auspices of the Provincial Noise Guideline NPC-300.

#### Transportation (Trucking Routes and the Guelph Junction Railway)

The Background Report notes *“The City must grapple with meeting the needs for more multi-modal transportation options for residents while prioritizing freight / goods movement in the area, which are crucial to supporting employment uses. This area has access to the City’s permissive trucking routes. In addition, Metrolinx and Guelph Junction Rail lines that have shaped the historic development of the area”* (pg. 44). We agree that freight and goods movement must be prioritized in the Study Area and emphasize that PDI’s operations require access to the Guelph Junction Railway and permissive trucking routes. PDI is dependant on continued access to both of these transportation options and appreciates the City’s acknowledgement that these options are critical to employment uses in the Study Area.



## Conclusion

Our client shares the City's goal of attracting investment to the Study Area and has invested over 9 million dollars in their locations on Victoria Road South and Elizabeth Street. As staff and Council consider land use designations that affect PDI, this investment and the 155 people directly employed by PDI must be considered.

PDI and GSP Group Inc. appreciate the opportunity to comment on the Background Report and Land Use Compatibility Study and look forward to continuing to work with the City to shape the Study Area. In order to remain updated on the status of the project, please add our project team to the York Road and Elizabeth Street Land Use Study and Urban Design Concept Plan circulation list for any public notifications in advance of any public consultation or Committee/Council meetings on this study:

- Richard Standish, President of PDI: [richard@pdibulk.com](mailto:richard@pdibulk.com)
- John Doherty, Partner, Gowling WLG: [john.doherty@gowlingwlq.com](mailto:john.doherty@gowlingwlq.com)
- Chris Pidgeon, Principal Planner, GSP Group: [cpidgeon@gspgroup.ca](mailto:cpidgeon@gspgroup.ca)
- Jennifer Gaudet, Planner, GSP Group: [jgaudet@gspgroup.ca](mailto:jgaudet@gspgroup.ca)

Thank you for providing us with the opportunity to comment. If you would like to discuss further, please do not hesitate to contact me via email or at (519) 569-8883.

Sincerely,  
**GSP Group Inc.**



Chris Pidgeon, MCIP, RPP  
Principal Planner

cc: Richard Standish, PDI  
John Doherty, Gowling WLG

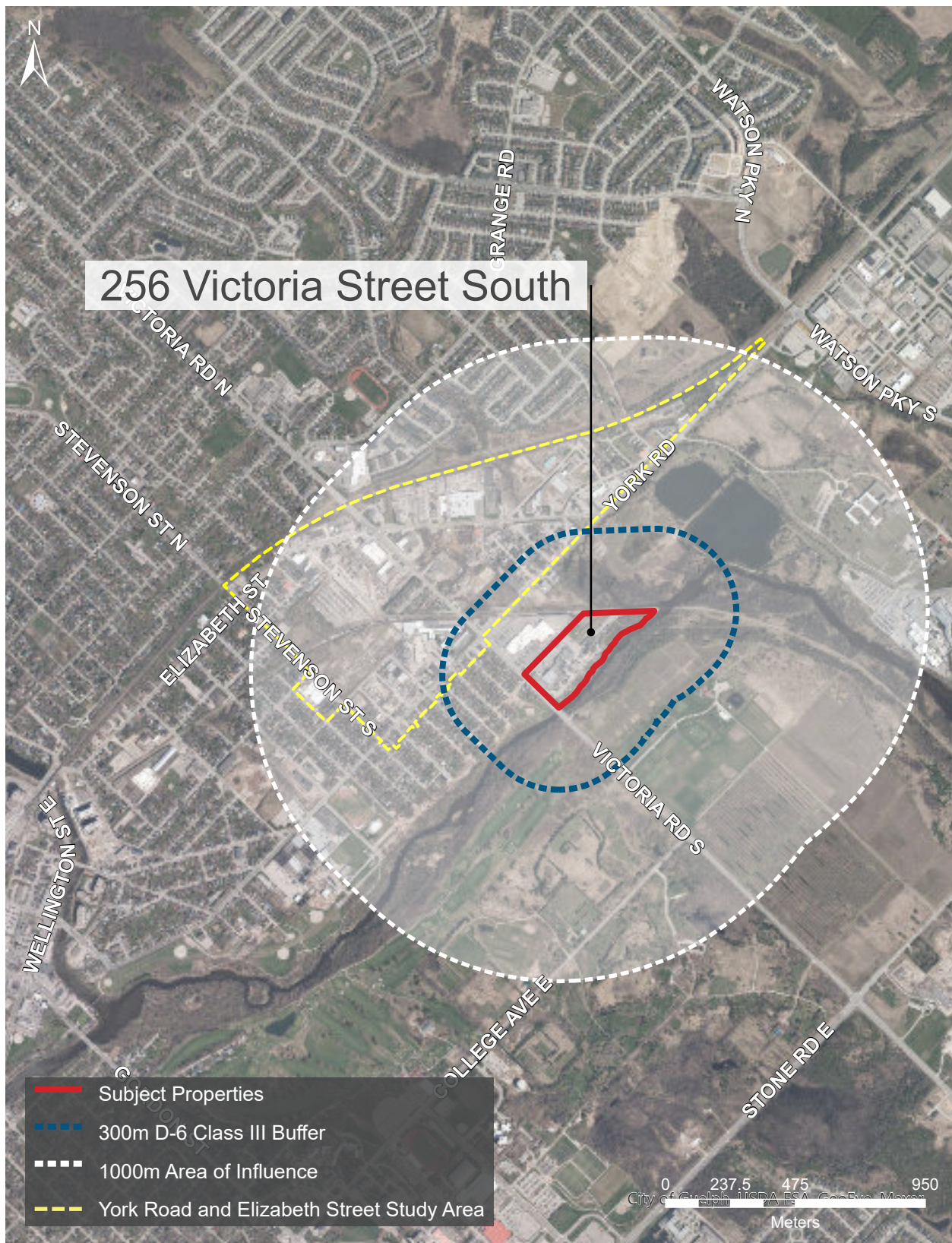
















May 5, 2022

File No. 20155

City of Guelph  
Planning and Building Services  
1 Carden Street  
Guelph, ON N1H 3A1

Attn: Mayor Guthrie and Members of City Council

Dear Mayor and City Council:

**Re: York Road / Elizabeth Street Urban Design Concept Plans  
Mayflower Properties Inc. (Polymer Distribution Inc.)**

GSP Group is the planning consultant for Mayflower Properties Inc., the owner of Polymer Distribution Inc. ("PDI"). We made significant submissions to the City during the processing of the York / Elizabeth Land Use Study, and we are now writing in response to the York / Elizabeth Urban Design Concept Plans.

***Background:***

PDI operates manufacturing and distribution facilities as a value-added component in the polymer, chemical, and food industries. This includes the loading and distribution of liquid chemicals, pellet manufacturing and distribution by rail containers and transport tankers, and on-site storage in bulk warehousing and silos. PDI owns and operates four locations in Guelph: 256 Victoria Road South, 351 Elizabeth Street, 240 Massey Road, and 265 Massey Road. One of



these locations, 351 Elizabeth Street, is within the boundary of the York Road / Elizabeth Street Land Use Study and the current York Road / Elizabeth Street Urban Design Concept Plans ("York /

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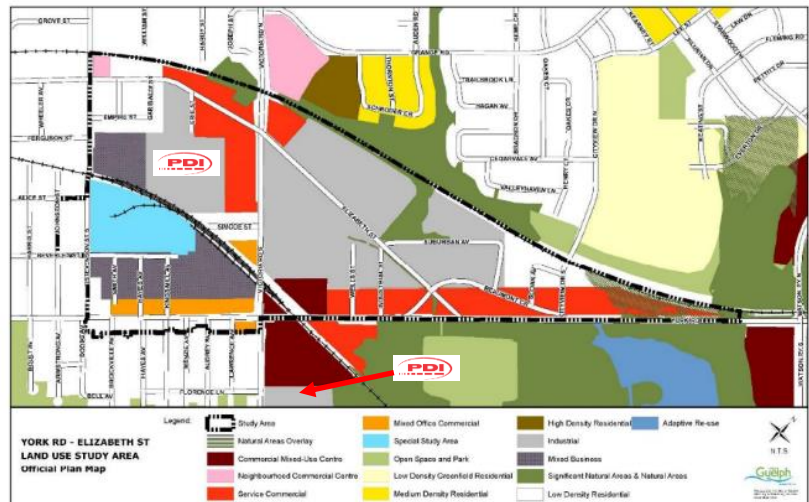
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Elizabeth Study”) being considered by City Council on May 9, 2022. A second PDI operation is located at 256 Victoria Road South is proximate to the York / Elizabeth Study Area.

In the York / Elizabeth Land Use Study, approved by Council on May 2021, no sensitive land uses were introduced in proximity to PDI’s operations that would negatively impact their heavy industrial operations.

Indeed, the Final Report of the “York Road/Elizabeth Street Recommended Land Use Study” (May 2021), provided considerable caution throughout the Report about the introduction of residential land uses:



*“Sensitive land uses, such as residential uses, should only be introduced where they will not impact the viability of existing employment uses. Future development applications for more sensitive land uses will be required to undertake land use compatibility studies.” (Page 14)*

We appreciated this thoughtful approach to providing protections to PDI Industries, including PDI’s significant investment in Guelph, major contributor to the revenue of the Guelph Junction Railway, and major employer and economic development provider.

#### **Former IMICO Site - 200 Beverley Street:**

We also provided comments on the former IMICO site at 200 Beverley Street, notwithstanding that it was excluded from the Study Area. The former IMICO site is immediately opposite PDI’s Elizabeth Street operation and, specifically the 16 rail spur lines, truck loading/unloading, and product silos on the north side of the Guelph Junction Railway. The “vision” for the IMICO lands to introduce residential land uses to that site is not compatible with the existing PDI industrial operations. Any introduction of sensitive land uses to that Site will be opposed by PDI. There are no land use permissions in place for the IMICO Site. As a result, PDI would be interested in discussing acquisition of those lands from the City of Guelph to protect PDI’s industrial operations. We would appreciate Council’s consideration of this request as a part of your deliberations on our further comments below.

### **Comments on Urban Design Concepts:**

The Draft Report (December 2021) sets out a “vision” for the Study Area in keeping with the previously approved Land Use Study (May 2021). That vision indicates that the existing business, commercial and industrial employment opportunities will be supported, *“while allowing for an appropriate level and scale of residential intensification in some areas ...”* (Page 6). However, no changes in land use are proposed through the Urban Design Concepts.

The Draft Report divides the Study Area into two areas: (1) Ward East (west of Victoria Road); and (2) East of Victoria and presents three Demonstration Sites:

1. Area A – Stevenson Street
2. Area B – Intersection of York and Victoria
3. Area C – Cityview Drive and York Road Area

PDI has no comments on Area C as it is located away from their operations, and therefore have no concerns with PDI’s operations.

For each of the three Demonstration Sites two-dimensional Schematic Designs and three-dimensional, colour Massing Models have been prepared. The legend for each of the Sites does not differentiate between land uses.

### **Area C:**

The Policy Directions for Area C indicates that:

*“As recommended in the Land Use Study, east of Clearview Street along York Road, this area is recommended to be re-designated from Service Commercial to Medium Density Residential to provide the opportunity for multi-unit residential including along York Road”* (Page 13).

Again, PDI has no issue with this policy directive.

When we look at the Schematic Design (Page 14) and the Massing Model (Page 15), the recommended mid-rise (residential) buildings are shown as orange colouring.



Figure 10: Directions 3D Diagram for Area C



## Area A:

The Policy Directions for Area A indicate that:

*“There is opportunity for redevelopment and intensification on Stevenson Street, north of the Guelph Junction Railway. . .”*

Nowhere in the policy directive is there any indication that there will be an introduction of Residential land uses in the vicinity of PDI Industries, Elizabeth Street operations.

However, both the Schematic Drawing and the Massing Models illustrate the same colour scheme shown in Area C, that is identified as Medium Density, Mid-Rise Residential uses.

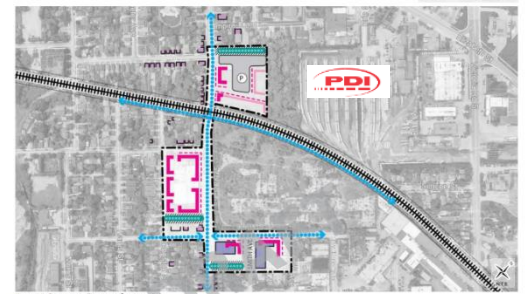


Figure 4: Directions Diagram for Area A



Figure 5: Directions 3D Diagram for Area A

## Area B:

The Policy Directions for Area B indicate that:

*“The easterly side of Victoria was recently re-designated to Commercial Mixed-Use Centre. . . . The Commercial Mixed-Use Centre designation allows for a wide range of commercial uses. It also allows for residential uses, however, before the lands are zoned to allow for more sensitive land uses, such as residential, a detailed study must be undertaken to ensure land use compatibility as the site is located in proximity to recycling/scrap metal operation” (Page 10)*

Similar to Area A, both the Schematic Drawing and the Massing Models illustrate the same colour scheme shown in Area C, that is identified as Medium Density, Mid-Rise Residential uses.

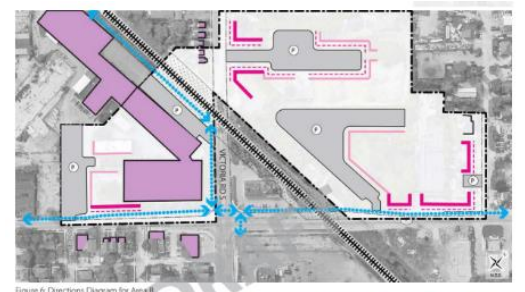


Figure 6: Directions Diagram for Area B



Figure 7: Directions 3D Diagram for Area B



### **Commentary:**

We remain opposed to any introduction of sensitive land uses into Areas A and B. PDI Industries' operations on Elizabeth Street and Victoria Streets are both considered to be heavy industrial uses. There are a number of Provincial directives that provide protection to existing industrial operations. Those directives are in place to ensure that industrial operations will not be impacted by nuisance complaints that may, for example, restrict the hours of operation and/or the overall viability of the business. The Provincial directives that protect existing industrial operations include:

- Environmental Protection Act, R.S.O. 1990;
- Ministry Guideline D-1 "Land Use Compatibility";
- Ministry Guideline D-6 "Compatibility between Industrial Facilities";
- Environmental Noise Guideline – Stationary and Transportation Sources – Approval and Planning (NPC-300); and
- New Draft Land Use Compatibility Guideline (2021).

Generally, these guidelines categorize industrial uses based on existing operations, and apply "Areas of Influence" and "Minimum Setbacks" (to property lines) between industrial and sensitive land uses. For example, the in-force and effect D-6 Guideline, identifies Heavy Industrial uses as Class 3 based on the following criteria:

- having frequent sound audible off site;
- dust and/or odour;
- vibration off site;
- outdoor storage of raw and finished products;
- large production levels;
- open / outdoor processes;
- continuous movement of products and employees; and
- daily shift operations.



PDI operations would meet many of these criteria and be classified as a Class 3 Industry. The D-6 Guideline further indicates that for Class 3 Industries the Area of Influence is 1,000 metres and the minimum separation distance to any sensitive land use is 300 metres, from property line to property line. Both Areas 1 and 2 Demonstration Areas are located less than 200 metres from PDI's heavy industrial operations and would not meet the in-force and effect Provincial requirements of compatibility if sensitive residential land uses are proposed.

It should be noted that while not approved, the Draft Land Use Compatibility Guideline (2021) proposed significantly larger Areas of Influence and Minimum Distance Separation between industrial uses and sensitive (i.e. residential) land uses.

On this basis, we believe that the “*York Road / Elizabeth Street Urban Design Concept Plans*” give City Council, the public and landowners a false sense of potential land uses in the area. For this reason, we recommend that the Report not be approved. Rather, we recommend that a “Land Use Compatibility Study” be undertaken to determine realistic land uses to inform the Urban Design for the area. This is the same recommendation that we made in our submissions on the “*York Road / Elizabeth Street Land Use Study*”. For City Council and Staff's benefit, we have appended that submission.

Yours truly,  
**GSP Group Inc.**

Chris Pidgeon, MCIP, RPP  
Principal Planner

cc: Richard Standish, PDI  
John Doherty, Gowlings WLG  
David de Groote, City of Guelph