



SHAPING GREAT COMMUNITIES

May 13, 2022

Project No. 17205

Submitted to Clerks via email 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: Decision Report: Clair-Maltby Secondary Plan and MESP
Proposed Official Plan Amendment No. 79 (May 16, 2022 – Item 2)
2143 and 2187 Gordon Street, Guelph**

GSP Group represents the owners of 2575950 Ontario Ltd. with respect to properties located at 2143 and 2187 Gordon Street (the “Site”).

Our client, GSP Group, and our consulting team have been involved since the commencement of the Clair-Maltby Secondary Plan (“CMSP”) process. We have provided written submissions and feedback at critical stages in the process and participated in public and stakeholder sessions, including Council meetings.

Specifically, we submitted detailed comments in September 10, 2021 on the following documents:

- 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)

City staff has also provided us opportunities for continued dialogue since that time to try and resolve and clarify matters related to our comments which we are very appreciative of.

Our client and consulting team have taken the opportunity to review the May 16, 2022 Decision Report for OPA 79 (“OPA 79”), including the Master Environmental Servicing Plan (“MESP”). We recognize the significant effort by City staff and consultant team to resolve and respond comments. We note the detailed comment chart contained in Attachment 6-1 to the staff report.

PLANNING | URBAN DESIGN | LANDSCAPE ARCHITECTURE

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gspgroup.ca

While we appreciate the inclusion of Alternative 9 for servicing as part of the MESP and the relocation of the proposed pumping station to the west side of Gordon Street, many of our concerns remain relating back to our September 2021 submission. Those major concerns are noted below:

1. Significant natural heritage changes are proposed as part of the final OPA 79 and Comprehensive Environmental Impact Study (“CEIS”) Phase 3 Impact Assessment and Management Plan - May 2022. These changes are not consistent with the OPA 42 settlement related to Site. A separate letter has been prepared by NRSI dated May 13, 2022 (attached) highlighting our concerns.
2. The Moraine Ribbon is still not supported from an ecological perspective and in our opinion as there is no technical basis or reasoning for inclusion in the OPA 79.
3. Practical engineering concerns related to servicing of CMSP have still not been addressed. There is significant topography with the CMSP which will require modification to allow for efficient and cost-effective servicing. These concerns were highlighted in MTE’s September 2, 2021 letter which was previously submitted to the City.
4. Cultural heritage policy concerns as they relate to 2187 Gordon have still not been addressed. Our concerns were highlighted in Stantec’s August 27, 2021 letter which was previously submitted to the City. We believe that current policies in the Official Plan are adequate and the nature of the CMSP policies are very prescriptive given there is not a full understanding of future roads and servicing that will be undertaken at the detailed subdivision design.

We would appreciate the CMSP planning process has tried to balance a number of competing interests and concerns to develop a comprehensive plan for this area of Guelph. However, we believe our outstanding issues and concerns are still not adequately addressed in OPA 79.

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. We would appreciate being notified of any final decision on this matter.

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
Vice President

att.

cc Brad Trussler, 2575950 Ontario Ltd.
Alex Drung, 2575950 Ontario Ltd.