



July 8, 2022

Project No. 21116

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

Attention: Abby Watts, Project Manager
Comprehensive Zoning Bylaw Review

Dear Ms. Watts:

**Re: Statutory Public Meeting Report – July 13, 2022 – Item 4.2
Comprehensive Zoning Bylaw and Proposed Official Plan Amendment
41-44 George Street, Guelph
Armtec Canada Inc.**

GSP Group represents the owner of 41 George Street (the “Site”) related to land use planner matters. The Site is owned by Armtec Canada Inc. (“Armtec”).

The majority of the Armtec Site is on east side of the Guelph Junction Railway at the terminus of George Street and Earl Street. This portion of the Site is designated High Density Residential and Significant Natural Areas and Natural Areas in the Guelph Official Plan. Section 9.3.5.1 i) permits “multi unit residential buildings generally in the form of apartments. There is additional land on the west side of the railway line which is designated Medium Density Residential. Section 9.3.4.1 i) permits “multi unit residential buildings generally in the form of townhouses and apartments.”

The current Armtec industrial operation and offices are located with the High Density Residential area. It has long been the desire to see this area transition from heavy industrial to residential use. In fact, the Site is currently for sale and is being marketed as a residential development site.

The Site would be considered a brownfield site given its historic heavy industrial use. It is also a complex redevelopment site given it is adjacent to the Guelph Junction Railway and the Speed River and its associated natural heritage area. We further recognize that this Site lies within an established neighbourhood and will require a balanced approach to all land use considerations for redevelopment.

The Site is currently zoned B.4-15 (both east and west sides of the railway). Section 7.3.4.15.1 recognizes “Metal fabricating industry” operated by Armtec at 41 and 44 George Street.

The draft Comprehensive Zoning By-law (the “CZB”) dated July 2022 proposes to rezone the portion of the site on the east side of the railway line to High Density Residential 7 - RH.7(H13) and the portion of the Site on the west side of the railway line to Medium Density Residential 5 - RM.5(H13). The H13 is a holding provision that relates to both zones which is “To ensure that municipal services are adequate and available, to the satisfaction of the City, prior to intensification of the lands.”

Section 6.1 of the CZB outlines the applicable residential zones. The Medium Density Residential 5 (RM. 5) indicates, “The purpose of this zone is to accommodate on-street townhouses to a maximum height of 3 storeys, and cluster townhouses and apartment buildings to a maximum height of 4 storeys. Further, the High Density Residential 7 (RH. 7) indicates, “The purpose of this zone is to accommodate apartment buildings and to allow for small scale convenience commercial uses within a building that has a residential use to a maximum height of 10 storeys.

We have reviewed the list of permitted uses contained in Table 6.2 (Permitted uses in residential zones). Further to our recent discussions with City staff, in general, we believe allowing for the full range of townhouse uses in the RH.7 zone City-wide is appropriate. We believe allowing for more flexibility in types of residential uses and forms would provide for a greater range and mix of housing options in the RH.7 zone City-wide and for redevelopment of the Site. Accordingly, we would appreciate consideration of all forms of townhouses across the entire Site (east and west sides of the railway line) and would be open to meeting with City staff at the appropriate time to discuss as you consider further refinements the CZB.

Thank you for considering our comments. Please do not hesitate to contact me in our Kitchener office by phone at 226-243-7296 or by email at handy@gspgroup.ca should you wish to discuss or clarify our comments.

Yours very truly,
GSP Group Inc.



Hugh Handy, MCIP, RPP
Vice President

cc Mayor Guthrie and Members of Council
Curtis Farmer, Vice President, WGI Westman Group
Melissa Aldunate, Manager, Policy Planning and Urban Design, City of Guelph