



April 19, 2021

Project No. 14143

Ministry of Municipal Affairs and Housing  
17th Floor, 777 Bay Street  
Toronto, Ontario M7A 2J3

Attention: Honourable Steven Clark  
Minister of Municipal Affairs and Housing

Dear Mr. Clark:

**Re: Request for Comments  
Consultation on Growing the Size of the Greenbelt  
Environmental Registry of Ontario posting ERO 019-3136  
1912 Gordon Street, Guelph**

---

GSP Group acts on behalf of the owners 1912 Gordon Street (the “Property”).

We are submitting comments on behalf of our client with respect to Growing the Size of the Greenbelt and the request of comments under the Environmental Registry of Ontario posting ERO 019-3136.

## **1. BACKGROUND**

The Property is located within the City’s approved Settlement Area Boundary which is a future growth area (approximately 415 hectares/1025 acres) in the south end of the City of Guelph between Clair Road and Maltby Road, known as the Clair-Maltby Secondary Plan (CMSP) area. The CMSP area, along with others were brought into the City of Guelph through annexation from Township of Puslinch in 1993. The CMSP is also combined with a Master Environmental Servicing Plan (MESP). These CSMP/MESP commenced in 2015 and we are now in Phase 3 (final phase) of the project.

GSP Group has represented several landowners since the commencement of the project CMSP/MESP project and has participated at all public and stakeholder processes and submitted comments on behalf of the owners to the City at critical stages in the planning process. We anticipate a draft of the Clair-Maltby Secondary Plan will be release in mid-2021 with approval anticipated by City Council in early 2022.

The goal of the CMSP is to accommodate new urban growth on full municipal services in the last Designated Greenfield Area in the City of Guelph. The Council approved guiding principles of the CSMP are:

PLANNING | URBAN DESIGN | LANDSCAPE ARCHITECTURE

1. Vibrant and urban
2. Green and resilient
3. Healthy and sustainable
4. Interconnected and interwoven
5. Balanced and liveable

These principles are the basis for permitting growth and balancing all elements within CSMP.

## 2. COMMENTS

The Province has asked for comments prior to April 19, 2021 under the Environmental Registry of Ontario posting ERO 019-3136 with respect to the Proposal to Grow the Greenbelt”.

Under the “Proposal details” is stated:

*The Ministry of Municipal Affairs and Housing is seeking feedback on ways to grow the size and further enhance the quality of the Greenbelt, with a priority of:*

- i) *A study area of lands focussed on the Paris Galt Moraine, which is home to critical groundwater resources*
- ii) *Ideas for adding, expanding and further protecting Urban River Valleys*

Our comments specifically relate to Question 1 which states: **What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?** and are as follows:

It is our view that any expansion to the Greenbelt whether the Paris Galt Moraine or otherwise can not and must not be on or over lands currently situated within an approved Settlement Area Boundary and Designated Greenfield Area. The CMSP is a planned growth location necessary to achieve other stated public interest objectives including the delivery of housing and jobs. These long standing objectives should in no way be compromised or impacted through any future decisions to expand the size of the Greenbelt.

We respectfully request consideration of our comments. Should you or MMAH staff like to discuss our comments, I can be reached in our Kitchener office at 519-569-8883 or by cell at 519-242-5351.

Request for Comments  
Consultation on Growing the Size of the Greenbelt  
Environmental Registry of Ontario posting ERO 019-3136  
1912 Gordon Street, Guelph  
April 19, 2021

---

Yours truly,  
**GSP Group Inc.**



Hugh Handy, MCIP, RPP  
Senior Associate

cc Dave Jassal, Ikonkar Group