



April 15, 2021

Project No. 16129

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
2009, 2021 and 2093 Gordon Street, Guelph**

GSP Group acts on behalf of Michael and Sarah Watt (2009 Gordon Street), 2021 Gordon Street Inc. and 2093 Gordon Street Inc. (the “Properties”) in the City of Guelph.

We are submitting comments on behalf our of our clients 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 Properties are 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:

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 states:

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*

The Province has posed the following questions and we respectfully request consideration of our comments:

Question 1:

- **What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?**

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.

Question 2:

- **What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?**

Similar comments apply as noted under response to Question 1. The Properties are within the CMSP which is a Designated Greenfield Area within the defined Settlement Area Boundary of the City of Guelph. The CMSP areas is required to accommodate growth of the City and therefore no expansion of the Greenbelt should be considered.

Question 3:

- **What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?**

The Urban River Valley designation in the Greenbelt Plan applies to lands in river valleys within an urban context that are publicly owned land. We believe these areas are currently protected through public ownership and would be further protected in Provincial and municipal policy documents, including Conservation Authority regulations. Accordingly, in our opinion the expansion river valley designations is not required. However, if a decision is made to expand the Urban River Valley designations that it must only apply to publicly owned lands and that mapping and associated policy clearly articulate this fact including a proviso that states for privately owned lands in the case of conflict the existing planning instruments (e.g. official plans and zoning) take precedence. This comment is based on previous Provincial mapping expansion exercises whereby the Provincial mapping and municipal official plan designations were in conflict and needed to be corrected after release to the public for consultation.

Question 4:

- **Do you have suggestions for other potential areas to grow the Greenbelt?**

The permanence of any decision to expand the Greenbelt must be considered and measured carefully; be based on fact and science; and lead to obvious and important public interest and policy.

In addition, we strongly suggest that other community building components be weighed into the decision making. For example, any lands currently within an approved urban boundary cannot and should not be considered for Greenbelt expansions. The Greenbelt must not become a growth management tool but rather a land use that is complimentary to city building, the environment and ensuring a stable food source.

Further the “Whitebelt” (beyond the real and identifiable natural heritage systems) has historically been considered a long term reserve set aside to accommodate future economic growth and housing must not be diminished. These lands are particularly important land supply as most municipalities are planning growth to 2051 through their comprehensive reviews. The long term future of the Greater

Toronto Area and economic prosperity rests on both compact urban form and new locations for people to live and work.

Question 5:

- **How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?**

Yes. The building of complete and resilient communities must include clean air, water and a secure local food supply but should also provide safe and affordable housing accommodation, close to jobs and recreational opportunities. The Ontario Planning system mandates that there be a balance of decision making with no one mandate necessarily being more important than the other. We suggest that expansions to the Greenbelt be subject to the same tests and measures as any other planning policy formulation.

Question 6:

- **Are there other priorities that should be considered?**

Land within the City of Guelph, particularly being planned for urban growth including land with the Clair-Maltby Secondary Plan should not be considered for further growth of the Greenbelt. Further, we believe the proposed growth of the Greenbelt could impact now or in the future, the logical and contiguous growth of the City of Guelph or small urban centres/hamlets/estate residential (as well as severances) and employment areas in the County of Wellington.

We appreciate your 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.

Yours truly,
GSP Group Inc.



Hugh Handy, MCIP, RPP
Senior Associate

cc Pete Graham, GWD Developments Ltd on behalf of 2021 and 2093 Gordon Street Inc.
Mike and Sarah Watt