



SHAPING GREAT COMMUNITIES

July 10, 2025

File No. 23002

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

Attn: Chris DeVriendt, MCIP RPP  
Manager of Development Planning

**Re: Official Plan Amendment and Zoning By-law Amendment Application:  
Formal Submission - 266 & 280 Clair Road West, City of Guelph  
2742707 Ontario Limited**

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GSP Group Inc. has been retained by 2742707 Ontario Limited (the "Owner") for the property located at 280 Clair Road West in the City of Guelph (the "Subject Lands"). We are pleased to formally submit the enclosed Official Plan Amendment and Zoning By-law Amendment applications to the City. The Official Plan Amendment and Zoning By-law Amendment are required to permit the development by Home Opportunities (the "Developer") of 2 apartment buildings and 31 stacked townhouse blocks totalling 960 dwelling units with associated parking and amenity space on an assembly of three (3) pre-existing vacant lots.

On December 23, 2024, we submitted an unofficial Official Plan Amendment and Zoning By-law Amendment application ("OPA" and "ZBA"), requesting to first proceed through the City's optional Pre-submission review stage ("Pre-submission"). On March 6, 2025, a comprehensive set of comments were provided by staff on our Pre-submission. Additional comments were provided on the Urban Design Brief and Tree Inventory and Preservation Plan on April 10, 2025.

This formal submission addresses comments received and is intended to advance the application to a statutory Public Meeting before Council.

### **Subject Lands Description**

The Subject Lands are known municipally as 266 & 280 Clair Road West, and is legally described as Part of Lot 11, Concession 7, Geographic Township of Puslinch, Now in the City of Guelph, County of Wellington. The Subject Lands have approximately 51 metres of frontage along Clair Road West with a depth of 400-410 metres. The Subject Lands have an area of approximately 85,500 square metres (8.5 ha) and is irregular in shape. The Subject Lands are currently vacant and undeveloped.

**PLANNING | URBAN DESIGN | LANDSCAPE ARCHITECTURE**

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## **Planning Policy**

The Subject Lands are currently within the Built-Up Area of the City and are partially designated as an Employment Area. The designated land uses in Schedule 2 of the Official Plan include 'Industrial' and 'Significant Natural Areas & Natural Areas' (Ecological Linkages and City of Guelph Natural Heritage System).

The Subject Lands are currently split zoned, including 'Conservation Land' (P.1) and 'Urban Reserve' (UR) in the City of Guelph Zoning By-law (1995)-14864. The Subject Lands are zoned 'Industrial' (B) and 'Natural Heritage System' (NHS) in the new Comprehensive City of Guelph Zoning By-law (2023)-20790.

## **Official Plan Amendment (OPA)**

An OPA is required to:

- Remove a portion of the Subject Lands from the City of Guelph's Employment Areas as highlighted on Schedule 1b of the Official Plan.
- Redesignate the developable portions of the Subject Lands from the 'Industrial' and 'Significant Natural Area and Natural Areas' designations in Schedule 2 of the Official Plan to the 'High Density Residential' designation.
- Facilitate the realignment of the Ecological Linkage portion of the City of Guelph's Natural Heritage System from the east to the west portion of the Subject Lands by redesignating a portion from the current 'Industrial' designation to 'Significant Natural Area and Natural Areas' designation.

The above land use changes will require Schedule 4 (Natural Heritage System) to be amended in a similar manner, changing the location of the Ecological Linkage within the Significant Natural Areas from the east to the west portion of the Subject Lands. The Ecological Linkage feature will be refined to a width of 60 metres, as recommended in the enclosed Environmental Impact Study.

Various site-specific policies are proposed to be added to the Official Plan. These site-specific policies can be found in the Draft OPA in the Planning Justification Report submitted within this application package.

## **Zoning By-law Amendment (ZBA)**

An application for a ZBA is required to facilitate a zone change from 'Industrial' (B) and 'Natural Heritage System' (NHS) in By-law (2023)-20790 and 'Urban Reserve' (UR) and 'Open Space' (P.1) in By-law (1995)-14864 to High Density Residential 7 with Site-Specific Provisions and a Holding Provision (RH.7-xx(Hxx)). A full zoning conformity table is included in the Planning Justification Report

that highlights areas where site-specific relief is required. The proposed site-specific provisions can also be found in the attached Draft Zoning By-law Amendment submitted within this application package.

The Holding Provision ('H') is requested to be applied to the Subject Lands to allow for consolidation of the parcels forming the developable area, while exchanging the adjusted ecological linkage corridor lands to the City. The H is also being requested to pause development on the Subject Lands until an appropriate long-term scope for affordable ownership housing can be established between the Owner and the City.

### **Comments and Associated Materials**

The following provides a summary of our responses to the comments received through the Pre-Submission review.

1. **Official Plan Amendment** application – following discussions with Planning staff, it is understood and confirmed that the requested OPA will be reviewed and considered under a single application and amendment recommendation.
2. The **Planning Justification Report** has been revised and updated to address comments received through Pre-submission. This includes updates for consistency (i.e. applicable designations, developable area), justification for site-specific regulations, the requested Holding Provision, further reference to the City's approved Housing Affordability Strategy, employment land conversion and explanation of Home Opportunities' Non-Profit Model.
3. The **Employment Lands Conversion Justification Report** has been revised and updated to address comments received through Pre-submission and the need for additional information and giving further emphasis and justification to certain policies. This includes further analysis and integration of the City's most current Employment Lands Strategy (2020), the PPS (2024) including Policy 2.8.2.5, the City's Official Plan including Policy 3.8.6, and the Subject Land's long- term vacancy.

It is noted that 280 Clair Road West was previously approved for conversion to residential for purposes of providing 'affordable' ownership housing by both Council (Dec 2023) and the Province (MMAH). Further, the Provincially Significant Employment Zone (PSEZ) was removed by the new Provincial Planning Statement in October 2024. The intent of this application is to shift to the Subject Lands again to rapidly providing affordable housing for employees and their families and to support local area employers current operations.

4. **Archaeological Assessment** – a Stage 1-2 Archaeological Assessment for 280 Clair Road W is included with this submission. The adjacent parcel, 266 Clair Road W will be assessed prior to site plan approval or site alteration activities.

5. **Urban Design** – we acknowledge the City’s detailed urban design comments and note that many of these items—such as the full Sun and Shadow Study and the Pedestrian Level Wind Study—will be most appropriately addressed during the Site Plan Approval stage. The proposed apartment buildings utilize a distinctive modular construction approach developed and produced by local Guelph-based manufacturer Kiwi Newton. This method supports both architectural interest and construction efficiency. As a purpose-built, large-scale affordable ownership housing initiative in the City, maintaining the proposed scale is essential to achieving and maintaining the affordability targets for the future homeowners. While Home Opportunities remains committed to providing high-quality urban design that will be consistent with the City’s standards, it is important to balance these enhancements with the financial feasibility of delivering truly affordable housing.
6. **Environmental Planning and Natural Heritage** – Tim Hortons (Restaurant Brands International or ‘RBI’) has agreed in principle to the ecological linkage relocation and its rational southerly continuation onto the western portion of the linkage on the eastern portion of their lands at 950 Southgate Drive. RBI is preparing a letter confirming this authorization and support, which will be submitted to the City when available. Consultation with Ministry of the Environment, Conservation and Parks (‘MECP’) is also currently underway regarding Species at Risk (‘SAR’) habitat and will be completed prior to site plan approval.
7. **Development Engineering** – civil engineering for grading and site servicing has been prepared by Counterpoint Land Development (‘Counterpoint’) to the standard 30% design and analysis stage. This includes the Functional Servicing and Stormwater Management Report (‘FSSR’) concluding that sufficient capacity exists to provide full municipal services to the proposed development. This is further confirmed in a memorandum prepared by Counterpoint (March 2025). A detailed FSSR and associated design will be provided during site plan approval.
8. **Environmental Engineering** – the Phase 1 Environmental Site Assessment (Phase 1 ‘ESA’) will be updated and extended to capture the northern corner of the Subject Lands. Further, a Reliance Letter will also be provided to the City prior to site plan approval.
9. **Traffic** – all appropriate requests will be accommodated in detailed design with any additional considerations addressed during site plan approval.
10. **Park Planning** – as the development will be non-profit, it is exempt under the *Planning Act* from conveyance of land for park purposes. It is the intent that the ecological linkage land will be conveyed to the City and a public trail system designed within the site.
11. **Upper Grand District School Board** – all noted safety requirements will be addressed and instituted for the development.

12. **Public Health** – all health requirements will be addressed and instituted for the development.

### **Submission Materials**

As part of the materials identified in the Development Review Committee (“DRC”) Pre-Consultation Summary and Checklist for a complete Official Plan Amendment and Zoning By-law Amendment package, the following list of materials are hereby enclosed within this application package:

1. Completed and signed **Application form** for an Amendment to the Official Plan and/or Zoning By-law;
2. **Planning Justification Report** (July 2025) including the Draft Official Plan Amendment and Draft Zoning By-law Amendment prepared by GSP Group;
3. **Architectural Package** (December 2024) including Site Plan, Site Statistics; Context Plan, Floor Plans, Building Elevations, Renderings, Cross Sections, and Shadow Studies prepared by Architecture Unfolded;
4. **Urban Design Brief** (December 2024) including Sun and Shadow Study prepared by Architecture Unfolded;
5. **Functional Servicing Report and Stormwater Management Report** (November 2024), prepared by Counterpoint Land Development;
6. **Opinion of Servicing of Proposed Development** (May 2025) prepared by Counterpoint Land Development;
7. **Engineering Civil Drawings** (November 2024) including Grading Plan, Erosion and Sediment Control Plan, Site Servicing Plan, Storm Drainage Plan, Post-Development Drainage Plan prepared by Counterpoint Land Development;
8. **Environmental Impact Study** (November 28, 2024) prepared by North-South Environmental. Further, an **Ecological Linkage** letter will be prepared by RBI (Tim Hortons) and submitted at a later date;
9. **Arborist Report - Tree Inventory and Preservation Plan** (November 2024) prepared by North-South Environmental;
10. **Hydrogeological Report** (January 2025) prepared by JLP Geotechnical & Environmental Consultants;
  - A full season (i.e. 12-month, April 2024-April 2025) of groundwater monitoring data and analysis will be provided during site plan approval.
11. **Geotechnical Report** (January 2025) prepared by JLP Geotechnical & Environmental Consultants;
12. **Employment Land Conversion Report** (July 2025) prepared by urbanMetrics;

13. **Phase I Environmental Site Assessment** (November 2024) prepared by Dillon Consulting;
14. **Archaeological Assessment** (October 2014) prepared by D.R. Poulton & Associates Inc.;
15. **Traffic Impact Study** (October 2024), including Traffic Geometric Plans prepared by Dillon Consulting;
16. **Parking Justification Memo** (November 2024) prepared by Dillon Consulting;
17. **Detailed Noise Study** (October 2024) prepared by Dillon Consulting;
18. **Air Quality Impact Study** (October 2024) prepared by Dillon Consulting;
19. **Pedestrian Wind Conditions Letter of Opinion** (October 2024) prepared by Rowan Williams Davies & Irwin Inc. (RWDI);
20. **Stage 1-2 Archaeological Assessment** (October 2014) prepared by D.R. Poulton & Associates Inc.;
21. **Topographic Survey** (January 2024) prepared by J.D. Barnes Limited;
22. **Community Energy Initiative** letter (October 2024) prepared by Newton Group; and
23. **Municipal Fee Deferral and Repayment Program** report (June 2025), prepared by urbanMetrics.

We trust that the above is sufficient to deem the Official Plan Amendment and Zoning By-law Amendment application complete and proceed to a statutory Public Meeting. Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,

**GSP Group Inc.**



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Encl.

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