

January 4, 2022

Tyler Shantz
Minister of Municipal Affairs and Housing
Municipal Services Office - Western Ontario
659 Exeter Road, Floor 2
London, ON N6E 1L3

(via e-mail)

**Re: City of Guelph Official Plan Amendment 80
ERO No. 019-5981 (Ministry Reference No. 23-OP-221935)**

On behalf of Fusion Homes, please accept the following comments in response to Official Plan Amendment No. 80 ("OPA 80"), as adopted by the City of Guelph on July 11, 2022 and currently before the Minister of Municipal Affairs and Housing ("MMAH") for a decision in accordance with Sections 17 and 26 of the Planning Act.

Fusion Homes is a leading community builder with deep roots in Guelph. For more than 20 years we have been developing and building homes and communities across this great City, including three high rise towers Downtown, plus a fourth tower that broke ground in fall 2021.

OPA 80 proposes to implement the policies of the Provincial Policy Statement and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019), as well as the provisions of the Planning Act and Clean Water Act across the City. OPA 80 includes updates to the City of Guelph Official Plan including:

- Extending the land use planning horizon from 2031 to 2051 in accordance with the 2019 Growth Plan;
- Removal of bonusing provisions in accordance with the 2019 Growth Plan;
- Updates to identify the Downtown as a Major Transit Station Area ("MTSA"); and,
- Proposes a decrease in the City's minimum intensification target from 50% to 46%.

We are supportive of many aspects of OPA 80 such as the focus of investment, employment, and residential uses within the Downtown, and the designation of Downtown as the City's MTSA. These objectives are essential to accommodate the anticipated growth of approximately 60,000 people and an additional 33,000 jobs over the next 30 years. Further, Bill 23 (More Homes Built Faster Act, 2022) introduced municipal housing targets based on population and size which assigned a housing target of 18,000 new dwellings by 2032 for the City of Guelph as part of the provincial goal to build 1.5 million homes in the next 10 years. Guelph is thousands of homes short of what it will need to fulfill its contribution to meeting this target. We believe there is greater potential for increased density and height within the Downtown, and support for reductions in parking throughout the City, which would strengthen Guelph's ability to build more homes and meet Provincial targets.

It is noted that the Downtown Secondary Plan ("DSP") was initially approved by the Council of the City of Guelph in 2012 and was subsequently brought into force and effect by Ontario Municipal Board decisions in 2013 and 2015. The initial purpose of the DSP was

to provide a policy framework to guide and regulate growth and development in the Downtown and to help achieve the provincial Growth Plan intensification target of 150 people and jobs combined per hectare to 2031. The DSP establishes the maximum height of 18-storeys within the Downtown, which has been maintained through OPA 80.

Through OPA 80, the DSP was updated to reflect the removal of bonusing provisions in conformity with the 2019 Growth Plan. OPA 80 has accounted for the loss of the additional height and density through bonusing by adding 2-storeys to the maximum heights permitted on the lands currently designated '4-8 storeys' (now '4-10 storeys'), '4-10 storeys' (now '4-12 storeys'), and '4-12 storeys' (now '4-14 storeys') within the DSP. It is noted that the previous bonusing provisions applied broadly and could accommodate additional height and density beyond 2 additional storeys. As such, we are of the opinion that additional height and density are needed in the Downtown to accommodate growth to 2051, in accordance with the 2019 Growth Plan.

Further, the maximum height of 18-storeys throughout the City does not account for development constraints and/or various guidelines/standards that dictate growth in the Downtown and broader Guelph. For example, sites that contain high groundwater or bedrock may not be able to accommodate underground parking and thus require additional height to account for structured/podium parking. Further constraints to development include the various guidelines/standards that apply to development in Guelph which dictate the location/size of residential uses (e.g., Downtown Secondary Plan, Downtown Streetscape Manual, Development Manual, etc.). In light of this, it is our opinion that the Guelph Official Plan requires further amendments to permit height beyond the 18-storey limit that currently exists.

Given the timeline for municipalities to undertake, then subsequently approve, comprehensive municipal reviews, an Official Plan needs to allow for flexibility in changes related to unit types/sizes and parking standards. As it is currently written, OPA 80 does not accommodate for the anticipated growth and densities for Downtown and the broader Guelph area in our opinion. Further, it would be beneficial for OPA 80 to further encourage parking reductions in strategic locations within Guelph, such as the Downtown and transit corridors. Other municipalities have embraced the need for additional height and reduced parking standards within a MTSA, such as the City of Kitchener which has approved applications with heights up to 45 storeys and applications with 0 required parking spaces within the Downtown/MTSA.

It is noted that Fusion is the landowner of various properties within the City of Guelph, including 58 Wellington Street East and 5 Arthur Street South ("Metalworks") which are both located within the Downtown/MTSA, and experience high groundwater or bedrock. Through the Minister's review and approval of OPA 80, we would request consideration for additional height in the Downtown, including the noted properties, which could support 23 storeys, or more.

We trust that these comments will be considered as part of the review of OPA 80. If you have any questions or require any further information, please do not hesitate to reach out.

Sincerely,



Lee Piccoli

Chief Executive Officer, Fusion Homes