



January 4, 2023

Municipal Services Office (Western Ontario)
659 Exeter Road - Floor 2
London, ON
N6E 1L3
Attention: Hon. Steve Clark

**Re: Commentary on The City of Guelph Official Plan Amendment 80
ERO 019-5981 (23-OP-221935)**

Dear Minister Clark,

On behalf of the Skyline Group of Companies, please accept our commentary in response to Official Plan Amendment 80 (“OPA80”), as adopted by the City of Guelph and currently before the Minister of Municipal Affairs and Housing for decision in accordance with Sections 17 and 26 of the *Planning Act*.

The Skyline Group of Companies is the proud community member and owner of several properties within the City of Guelph, and most notably within the Downtown. We actively contribute as an integral member within the community, investing in the downtown in the excess of \$100 million. Skyline frequently engages with City staff and has been consistent in providing comment pertaining to local policy as it pertains to the future development of Guelph’s downtown.

OPA80 notes the proposed implementation of policies to ensure consistency and regard for Provincial policies and interests. We were pleased to see that the proposed amendments present a general intent to focus investment, employment, and residential uses within the Downtown, also designating downtown as a proposed protected Major Transit Station Area (“MTSA”), presenting a *prospective* positive attribute of the plan. OPA 80 proposes to decrease the City’s minimum intensification target established through the 2019 Growth Plan from 50% to 46%. We believe there remains opportunity for a comprehensive and clear vision to be implemented through the City’s Official Plan that will make full utilization of the City’s potential to bolster the Downtown as a catalyst for economic development and facilitate the provision of a diversified housing stock.

It is noted that the Downtown Secondary Plan (“DSP”) was approved by the Council of the City of Guelph in 2012 and was 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 by 2031. The DSP establishes the maximum building height of 18-stories within the Downtown, which has been maintained through OPA80. While we disagree with the policy in the Official Plan that no building shall be taller than the height of the Church of Our Lady Immaculate, this policy can be maintained with taller buildings situated on lower geodetic elevations.



Further, due to the removal of bonusing provisions in accordance with the 2019 Growth Plan, OPA80 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 in height. As such, it is our opinion that additional height and density is needed in the Downtown to accommodate growth to 2051 beyond what has been proposed in OPA80.

The maximum height of 18-storeys throughout the City does not account for development constraints and 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.). Accordingly, it is our opinion that the Guelph Official Plan requires further amendment to permit height beyond the 18-storey limit that currently exists.

Clear and explicit direction should be provided to ensure that increased heights and appropriately robust density targets are promoted near transit and within the Downtown, which is proposed in its entirety to be a MTSA. Guelph is forecasted to experience growth of approximately 60,000 people and an additional 33,000 jobs over the next 30 years. Consideration should be given to providing additional direction on further delineation of minimum density targets, with proposed increases to height and density, for areas within close proximity to transit. The City has an opportunity to present proactive targets to assist in facilitating additional delivery of homes and jobs within its Downtown, beyond the minimums in various areas under the current plan.

There is clear intent through the proposed policies for the City to impose future Inclusionary Zoning on the entirety of the Downtown. Thoughtful consideration should be given to the impact this will have on the direly needed delivery of viable housing options within the Downtown. We hope to continue to deliver much needed rental housing within the City and note that we currently have property within the Downtown that can facilitate the delivery of hundreds of purpose-built rental housing units. Unlocking the potential of these properties and the entire downtown should be a priority of this plan to ensure full utilization of these sites and delivery of accessible housing options. Further imposing constraints on development across the downtown will drive up the cost of housing, especially where height and parking policies remain inconsistent with other Ontario municipalities.

A framework should be established to ensure supporting variables to facilitate growth and Transit Oriented Development (TOD) within the Downtown and MTSA are provided. One such variable that appears to be void of consideration through the proposed plan is the promotion of reduced parking requirements for both employment and residential uses. 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, OPA80



does not accommodate for the anticipated densities and parking reductions near an MTSA that other municipalities of similar size have in their Official Plans in Ontario. A few nearby examples of municipalities that have embraced the need for additional height and reduced parking standards within a MTSA include: The City of Kitchener which has approved applications with heights up to 45 storeys and parking reductions to 0, The City of Barrie which has approved applications with heights up to 46 storeys, the Town of Milton which has approved applications with heights up to 31 storeys, and the City of London which requires 0 parking for residential uses in the downtown.

It is noted that Skyline is the landowner of the property municipally known as 70 Fountain Street, currently approved by the Ontario Land Tribunal for 16-storeys in height. Through the Minister's review and approval of OPA80, we would request consideration for additional height in the Downtown, including the 70 Fountain Street property which could be up to 19 storeys in height without being taller than the Church of Our Lady Immaculate.

We look forward to seeing the positive effects a comprehensive refinement of the City of Guelph's Official Plan will have on the advancement of the Downtown as a resilient, adaptable and prosperous heart of the City for the future.

Should you have any questions or would like to discuss further, please contact the undersigned at your earliest convenience.

Kind Regards,

Greg Jones
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Platinum
member