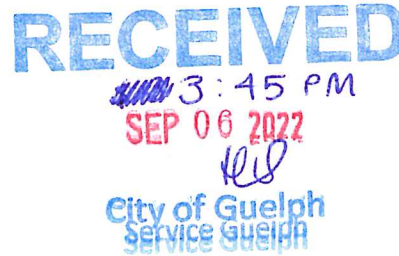


Howard Kennedy, President
Upbuilding! Non-Profit Homes
105-60 Fife Road, Guelph ON N1H 6Y2

Guelph City Council Members
c/o Stephen O'Brien, City Clerk
City of Guelph
1 Carden Street, Guelph ON N1H 3A1



September 2, 2022

RE: Notice of Intention to Designate, 50-60 Fife Road

Dear Mr. O'Brien and Members of Council;

We are writing in response to the Notice of Intention to Designate addressed to Upbuilding Non-Profit Homes Inc. and dated August 4, 2022. Please consider this letter an official objection to the proposed designation of heritage attributes as identified in the Notice of Intention to Designate.

UpBuilding Non-Profit Homes is a well-established non-profit housing provider in Guelph. We have provided a quality, affordable housing community for families and individuals of diverse ethnic, social, and economic backgrounds at 50-60 Fife Road since 1990.

To increase the supply of affordable housing in Guelph and Wellington County, UpBuilding is proposing to develop 18 one-bedroom units as two three-storey stacked townhouses on the eastern portion of our existing property. The proposed affordable units help to meet a large and unmet need for affordable rental housing in the City of Guelph and align with the City's Affordable Housing Strategy, the County Housing and Homelessness plans, Guelph's Community Plan, and current land use policies.

The construction of these 18 affordable units would necessitate the demolition of an old building with a conical tower that is listed as a property of interest on the Heritage Registry, but it is not currently designated as a heritage property. It has not been a private home for about 100 years and has been completely altered since that time. It is now subdivided into 4 apartments and there is very little of the original building left.

At a City Council meeting on July 13, 2022, Council approved the following recommendations:

1. That the heritage attributes of the tower portion of the listed heritage building at 50-60 Fife Road be retained and that partial demolition of the balance of the building be approved.
2. That the property at 50-60 Fife Road be retained on the Municipal Register of Cultural Heritage Properties with a revision of the property description limited to the heritage attributes of the tower portion of the building.
3. That the City Clerk be authorized to publish and serve notice of intention to designate the heritage attributes of the tower portion of the listed heritage building at 50-60 Fife Road pursuant to section 29, Part IV of the Ontario Heritage Act.

4. That the designation by-law for 50-60 Fife Road be brought before City Council for approval if no objections are received within the thirty (30) day objection period.

The heritage attributes of the tower, as identified in the staff report to Council dated July 13th, included:

- Conical roof with a flat top;
- Slate shingles with square and hexagonal shape; and
- Wooden corbels supporting the tower roof soffit.

At the July 13th Council Meeting, Howard Kennedy, President of UpBuilding Non-Profit Homes, delegated and indicated that UpBuilding was willing to preserve the heritage attributes of the tower provided that those elements could be relocated elsewhere on site and that the building and the balance of the tower could be demolished to allow for the construction of the proposed 18-unit development. At the meeting, Mr. Kennedy and members of Council were confused as to why formal designation was necessary, if UpBuilding had already committed to preserving the elements identified as heritage attributes.

UpBuilding is now submitting a letter of objection to the Notice to Designate due to concerns pertaining to the designation that are procedural, technical, and financial in nature.

Procedural Concerns

The recommendations put forth to Council on July 13th, 2022, were not consistent with the recommendations made by the Heritage Committee on June 23, 2022. The revised Minutes from the July 13 Council Meeting include a letter from P. Brian Skerrett, Chair of Heritage Guelph, stating that they did not approve the recommendation that Heritage Planning staff had put before Council.

Further, Heritage Planning staff did not contact UpBuilding or our consultants to inform them that the recommendations that were going before Council were going to be altered at any point between the June 23rd Heritage Committee Meeting and the July 13th Council Meeting. Due to the Rogers power outage, the revised agenda with supporting documentation from the Heritage Committee was also not posted on schedule, causing some confusion as to why the recommendation before Council had been altered and how the changes would be interpreted.

Should elements of the tower be designated, the demolition and reconstruction of a heritage feature using the conical roof, slate shingles and wooden corbels would, per the Heritage Permit process, be subject to approval by the Heritage Committee once again. UpBuilding is concerned about the lack of clarity regarding how the heritage attributes should be conserved after the building is demolished. Further, navigating the Heritage Permit process should the heritage attributes be formally designated would add time and expense to the project.

Technical Concern

From a technical perspective, there is uncertainty as to the condition of the heritage attributes and how feasible it is to move the conical tower intact. The conical roof and slate tiles are in poor condition. Based upon further discussions with Tacoma Engineers and Grinham Architects since the Council Meeting, we have identified that this may or may not be possible without incurring significant damage

to the top of the tower. If the conical roof were to be deconstructed and reconstructed instead, there is a high likelihood that the slate tiles may shatter.

Financial Concern

Lastly, since the July 13th Council Meeting, we have gotten an estimate on the approximate cost of relocating or dismantling the heritage attributes and constructing a commemorative pavilion to display them. The cost is estimated at \$100,000 on top of standard demolition costs. This is the equivalent cost of an entire unit of housing at current construction costs.

Heritage Planning staff have already confirmed that there are no grants available to assist with the relocation of heritage features, beyond the cost of a heritage designation plaque from the Planning Services budget.

Our consultant team believes we will be hard pressed to justify the costs associated with the relocation of the heritage features in funding applications to the Canadian Mortgage and Housing Corporation and other funders, which could make it more challenging to finance the new affordable units. When it comes to building affordable housing, budgets are always tight and highly scrutinized.

We would posit that while a commemorative pavilion with heritage features is a desirable goal should funding be available, designating features devoid of their original context in the home is not the best use of public funds amidst a housing crisis. A letter from heritage consultant, Megan Hobson, previously circulated to Council in the July 13th meeting package, reiterated her professional opinion that retaining the tower in its entirety—let alone simply heritage features—would have little heritage value and that the history of the property could be better conveyed with a commemorative or interpretive feature explaining the history of the site without designation.

In conclusion, while UpBuilding Non-Profit Homes would like to preserve the heritage features as identified by Heritage Planning staff as much as possible within the confines of a tight construction budget, we feel that designating the features without additional funding streams for heritage preservation may effectively kill this affordable housing project. The estimated cost of relocating the roof, soffit, and wooden corbels, coupled with the yet unknown costs of any reconstruction work, may render the project financially unfeasible for UpBuilding Non-Profit Homes.

We ask that Council reconsider the Intention to Designate in light of the above information and that they withdraw the Notice of Intention to Designate.

Sincerely,



Howard Kennedy, President
UpBuilding Non-Profit Homes (Guelph) Inc.