

April 14, 2023

BY EMAIL: clerks@guelph.ca

City Clerk's Office
City of Guelph
1 Carden Street
Guelph, ON
N1H 3A1

Dear Mayor Guthrie and Members of Council

**Re: City Council Meeting on April 18, 2023 – Agenda Item 3.2
Decision Report 2023-129
Comprehensive Zoning By-law Review and Companion Official Plan Amendment**

Fusion Homes, the owner of multiple parcels of land for future development of residential units throughout the City of Guelph, is pleased to submit this letter with respect to the City of Guelph's Comprehensive Zoning By-law. The purpose of this letter is to formally request a deferral of decision for the proposed new Comprehensive Zoning By-law.

Firstly, the City received approval of Official Plan Amendment 80 ("OPA 80") from the Province on April 11th which included several changes to the Official Plan that was originally approved by Council and which directed the new Zoning By-law. The Comprehensive Zoning By-law was published on the City's website prior to final approval of OPA 80 from the Province. The newly approved OPA 80 could have implications for the Comprehensive Zoning By-law which will not be incorporated into this version. As such, the Comprehensive Zoning By-law should be reviewed by staff to ensure it is in conformity with OPA 80 and therefore the decision should be deferred until such review can take place.

Additionally, the Province recently released a new draft Provincial Planning Statement (PPS), which proposes a number of changes that may lead to changes in the Official Plan or new Zoning By-law. It is crucial to have a thorough understanding of the implication of the new PPS before finalizing the Comprehensive Zoning By-law.

Some of the regulations contained in the Comprehensive Zoning By-law (2023)-20790 dated April 18, 2023, Fusion is supportive of, including:

- Section 6.3.2. – Semi-detached dwellings no longer restricted by lot coverage. This change would allow Fusion to offer a larger, family oriented semi-detached housing product.
- Section 6.3.3. – Lot coverage on townhouse units has increased from 50% in the current Zoning By-law to 55%. We believe this will reduce or eliminate the need for minor variances given the building setbacks often did not align with the maximum building coverage.

With that said, apart from the evolving planning policy at the Provincial and Municipal level, Fusion Homes has concerns regarding several updated regulations within the Comprehensive Zoning By-law.

We believe these regulations will have a negative impact on Fusion's ability to provide new residential units at the density, affordability, and timelines the City desires. Examples of these regulations include:

- Table 5.2 (1) – Increased required garage area for townhouses from 18m² to 20m²
 - In a home product type which is already constrained in livable floor area, this is a significant loss in livable space within this unit type. 18m² has proven to be sufficient garage space for residents.
- Table 5.9 – Maximum garage width of 5m for single detached homes in an RL.2 zone
 - This eliminates the possibility of much-desired two-car garages on house products on lots less than 12m wide, and as a result will reduce affordability of homes with a two-car garage.
- S 5.11.2 Maximum garage projection
 - Reducing the projection of garages to not project beyond the main front wall will impact the livable space of new residential homes. More space within the building envelope will be allocated to vehicle storage rather than livable space.
- Tables 6.22, 6.26, 6.30, 6.34, 7.4, 7.8, 7.12 – Required Common Amenity Space for high-density and mixed-use development.
 - The requirement for 20m² of Common Amenity Space per unit is a significant land allocation for high-density development. This regulation is highly restrictive and will result in the construction of less residential units at higher cost at a time where the City and Province have identified a need for more residential units to be constructed. Comparable municipalities such as Kitchener, Waterloo and London do not require Common Amenity Area for multi-residential or mixed-use sites.

In light of the above, Fusion Homes urges Council to defer the decision of the Comprehensive Zoning By-law until City staff can do the following:

1. Review the changes to the Official Plan and how the Zoning By-law is affected;
2. Review the new Provincial Planning Statement and understand the changes and implications on the Official Plan and Comprehensive Zoning By-law; and,
3. Engage further with the building industry to understand how some new regulations will impact the ability to construct new homes as the City has committed to construct 18,000 new homes in Guelph by 2031.

Thank you for consideration of our comments. We would also appreciate being added to the notification list for any further information or City Council decision on the Comprehensive Zoning By-law.

Sincerely,



Ryan Scott
Senior Vice President, Development & Finance

cc: Abby Watts, City of Guelph