



February 6th, 2025

City of Guelph
1 Carden St, Guelph
ON, N1H 3A1

Attn: Mayor Guthrie and Members of Council

Re: City of Guelph Downtown Building Heights and Built Forms Draft Official Plan Amendment

Dear Mayor Guthrie and Members of Council,

As an active home builder and owners of multiple parcels of land within Downtown Guelph, we have reviewed the City's draft Official Plan Amendment related to Downtown Building Heights and Built Forms. The purpose of this letter is to provide written comments related to the Official Plan Amendment for consideration of Council and staff as part of the statutory public meeting on February 11th, 2025.

We appreciate the City's commitment to facilitating new housing construction through the review of the Downtown area as it relates to building height. We believe increasing permitted building heights will allow for increased residential density in the City's only Major Transit Station Area and contribute to achieving the goal of building 18,000 new homes by 2031. In general, we are supportive of additional height within the Downtown area without the need for costly individual Official Plan Amendment's. We do have some questions and concerns regarding the draft Amendment.

In November 2024, City staff conducted industry focus group meetings where professionals and home builders like us were asked to provide input on what we would need to see to help encourage more residential development in Downtown. At this meeting, we expressed that development sites are already constrained through other factors such as floorplate size, FSI, setbacks, building step backs, and angular plane requirements. As such, the building height restrictions are redundant and act as a barrier to viable residential development. Fellow industry professionals noted that the economies of scale for high-rise developments require a minimum of 25 storeys to reach financial viability.

We are concerned that the feedback provided is not reflected in the draft Amendment. We are unsure as to why the maximum building height is 20-storeys when industry feedback indicated that

buildings greater than 20 storeys provide for more feasible development. Furthermore, many properties within the Downtown area are not suitable for redevelopment due to size, heritage status, site conditions, etc. and will likely remain undeveloped in the near future. As such, the City should capitalize on the potential of the viable development sites and allow for more height across the entire Downtown Area. This would ensure that land is used efficiently, considering site constraints and market demand, without arbitrary height limitations.

We have concerns that the proposed heights within the Downtown Area are not consistent with the Province's direction to seriously reconsider height and density within Major Transit Station Areas in order to support residential development. The City has a critical opportunity through this amendment to make a significant impact on the availability of new residential homes. However, the current plan is not ambitious enough and does not provide enough opportunity to support meaningful redevelopment projects in the Downtown. In addition, the proposed height map is quite prescriptive almost taking a site-by-site approach versus a simpler development area/zone approach. We are concerned this will continue to result in individual Official Plan Amendment applications.

It is our understanding that changes to any heights within the Special Policy Area (SPA) are not permitted without consultation with the Province. To date, we have not been made aware of any conversations with the Province regarding such review so we believe a couple of minor changes to the Height Schedule in the draft OPA were made in error. However, we do believe our properties along the river i.e. Metalworks and 58 Wellington Street represent ideal locations for increased height Downtown due to their proximity to transit, size, their end block locations, and their potential to act as visual gateways into the Downtown. As such, we would encourage the City to engage with the Province to initiate a comprehensive review of the SPA to permit increased height and FSI in step with the increases shown in other areas of Downtown.

As City staff considers the feedback received to-date in preparation for the next draft for Council's consideration, we would welcome the opportunity to meet and further discuss the points mentioned above. We appreciate the opportunity to provide these comments and look forward to our continued collaboration with the City to deliver many new homes in Downtown Guelph. We will continue to be engaged in the process and hope to see our comments reflected in a subsequent draft of the Official Plan Amendment.

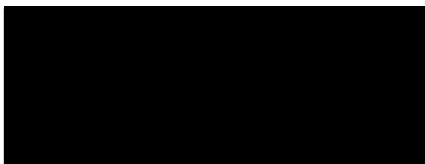
We would be happy to meet with staff to discuss our comments in advance of the release of a second draft of the Official Plan Amendment.

Additionally, we would appreciate being included the mailing list for formal notice of passing of the Official Plan Amendment.

If you have any questions or would like to discuss our comments in the meantime, please do not hesitate to contact me at [REDACTED] or by email at [REDACTED]

Sincerely,

Fusion Homes



Ryan Scott
Senior Vice President, Development & Finance