



April 4th, 2025

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

Attn: Mayor Guthrie and Members of Council

**Re: City of Guelph Proposed Downtown Building Heights and Built Forms
Official Plan Amendment No. 106**

Dear Mayor Guthrie and Members of Council,

As an active developer and home builder and owners of 58 Wellington Street East, and 5 Arthur Street South (known as the Metalworks) within Downtown Guelph, we have reviewed the City's proposed Official Plan Amendment No. 106 related to Downtown Building Heights and Built Forms. The purpose of this letter is to provide written comments related to the proposed Official Plan Amendment No. 106 for consideration of Council and staff as part of the statutory public meeting on April 8th, 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. We believe the current proposed height permissions are a step in the right direction for the City to achieve its housing goals. In addition, we believe the Special Policy Area has the potential to make significant contributions to this goal, however, it is our understanding this area has been excluded for consideration for additional height due to the requirement of Provincial Ministry engagement to enact policy changes in this area. We would respectfully request that the City advance the review of this area expeditiously with the Ministers of Municipal Affairs and Housing and Natural Resources and Forestry as it relates to increased height permissions.

When the Downtown Secondary Plan was created, the Special Policy Area along the Speed River was planned to contain some of the tallest buildings in the City. The topography of the Downtown Area is such that the Special Policy Area sits lower near to the river (~310m above sea level), while the Downtown Core and Basilica of Our Lady sits 10-20 metres higher (~320-330m above sea level) according to GCRA contour mapping. This allowed this area to accommodate the most height while

Creating the least visual impact to the rest of the Downtown Area. We understand that within the Special Policy Area, any change or modification to policies and land use designations must be approved by the Ministers of Municipal Affairs and Housing and Natural Resources and Forestry prior to the City approving such changes or modifications. As such, we would encourage the City to continue pursuing their wholistic review of the Special Policy Area and request approval from the Ministries to permit more height proportionate to the new height permissions in the rest of the Downtown Area. We feel this is necessary to carry the massing design principles of the Downtown Area forward as it relates to targeted areas and transitions of height Downtown.

On a site-specific basis, we note that our property on 5 Arthur Street South (the Metalworks), remains the only property Downtown which has a maximum FSI imposed. The maximum FSI of 2.0 is calculated across the entire five-phase development. The first four phases have been developed to achieve the height and density targets of the City, within Council-approved height limits. Currently, a total FSI of 1.79 is present on the first four phases of the development site. Resultantly, the remaining FSI of 0.21 is permitted for the Phase 5 portion. This will not allow for the City's planned build out of the site. The site-specific zoning for this site requires a building height between 4-14 storeys and a residential density of 100-150 units per hectare. An FSI of 0.21 would not meet the minimum height and density requirements for the site. Hence the maximum FSI for this site hinders our ability to build out the development site as the City has planned or achieve the City's minimum height and density requirements. As such, we request that the maximum FSI provision imposed on 5 Arthur Street South be removed through the Official Plan Amendment No. 106.

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 result in continued efforts from the City to review height and density within the Special Policy Area.

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.

Fusion Homes



Ryan Scott
Senior Vice President, Development & Finance