

December 22, 2022

Tyler Shantz  
Ministry of Municipal Affairs and Housing  
Municipal Services Office - Western Ontario  
659 Exeter Road, Floor 2  
London, ON N6E 1L3

**RE: ERO 019-5981 City of Guelph – Approval to Amend a Municipality's Official Plan**

On behalf of Fusion Homes, we are submitting the following recommendations in response to the posting of the City of Guelph's Official Plan to the Environmental Registry of Ontario for public comment on December 5, 2022.

As a leading community builder with deep roots in Guelph, we appreciate the distinctiveness and civic pride of our community. We share that pride in its unique identity as an engine for Ontario's agri-food and manufacturing sectors, an incubator for scientific discovery and innovative technology, and a training ground for Ontario's next generation of leaders, which together make it one of our province's most liveable communities.

Yet for too many, finding a home in our city is out of reach. Guelph, like many Ontario communities, is facing an acute housing supply shortage. Even under the proposed Official Plan currently under review, Guelph is still thousands of homes short of what it will need to fulfill its contribution to meeting Ontario's target of 1.5 million new homes built over the next decade. If these homes are not built, Guelph's existing industries will be unable to attract the workforce they need to maintain their critical output, and thousands of local entrepreneurs and graduates will be forced to look elsewhere to establish the next generation of successful enterprises.

Fusion Homes has a strategic role in ensuring that our city remains on a path towards sustainable growth and a liveable future. This is why Fusion made the decision to invest in Guelph, spending \$72.2 million to purchase the Guelph Innovation District lands from the Province of Ontario. As the owner and steward of the Guelph Innovation District, we are interested in partnering with the Province and the City of Guelph to realize the exciting vision of a flourishing, inclusive and connected community; one that embraces how residents want to live, work and play while building a foundation to harness emerging economic opportunities.

We respect the principles that guided the City of Guelph's Official Plan, and more specifically, the Guelph Innovation District Secondary Plan. However, in the decade since those parameters were established, we have collectively experienced transformative change. Many workplaces – especially in the innovative and knowledge economy – have shifted decisively from mass offices to flexible, hybrid work environments that embrace the capabilities of contemporary technology and communications. Striking a balance between work and family life has achieved a renewed pre-eminence, with skilled and in-demand talent pursuing those opportunities that reward productivity, not merely presence.

*Love the journey*

Furthermore, the need for “workforce housing” – or attainable housing, affordable to working families of industries across Guelph – is critically important. Many prominent employers in Guelph have shared with us that a key barrier to their growth is the ability to attract talent. And key to that talent attraction is the ability of those workers and their families to find attainable housing. By increasing the supply of housing in Guelph, we firmly believe we will be contributing to the overall employment base of this city.

Nearly everyone agrees: our housing supply crisis has reached new levels of urgency, which is reflected in the Ontario Government’s commitment to make necessary decisions to get the homes built that Ontario families need. Increasing housing supply is good for our community, good for our economy, good for the employers of Guelph and it promotes the inclusive community we are all striving to create.

With this focus in mind, Fusion Homes strongly recommends the following modifications to the City of Guelph Official Plan, regarding the Guelph Innovation District Secondary Plan:

- Amend Land Use to change a portion of lands designated as employment to residential and mixed-use, recognizing the City has a surplus of employment lands and a significant need for new housing units to meet the Province’s directed housing unit target
- Amend Built Form Elements to increase flexibility on building heights and allow for a greater number of housing options
- Amend the Block Plan process to reduce red tape and enable completion of the Block Plan to run concurrently with required development applications

Through these targeted changes, Fusion Homes will be able to bring forward a transformational, innovation-focused community vision. It will enable us to move ahead more rapidly with building over 4,000 homes – 1,500 more than currently envisioned in the secondary plan – through a mixed-use, variable-density approach that will better unify residential, retail, employment, and other uses to reflect how residents and their families live. It will allow us to accommodate the needs of job creators, thereby maintaining a strong employment base that reflects the opportunities of tomorrow rather than yesterday.

We have enclosed a precise planning rationale and supporting documentation for your consideration. We look forward to continuing our constructive partnership with the City of Guelph and the Ontario Government as we work together to ensure that our city and province remain the best place in the world to call home.

Sincerely,



Lee Piccoli  
Chief Executive Officer, Fusion Homes

## Fusion Homes – Supporting Documentation

RE: ERO 019-5981 City of Guelph – Proposed Modifications to City of Guelph Official Plan Amendment #80

The modifications are proposed specific to the Guelph Innovation District and in addition to the approved Official Plan Amendment #80, as approved by City Council. The modifications represent policy direction changes to support the expedited process of the Guelph Innovation District to support the objective of bringing additional housing to market as quickly as possible. The Land Use Schedule and Build Form Schedule modifications support additional height and density for identified Nodes and Mixed Use Areas. A conversion of a portion of employment lands is proposed based on the need for additional housing in the City and the City’s Land Needs conclusion that there are surplus employment lands.

The City’s OPA #80 did not include any modifications to the Guelph Innovation District Secondary Plan that was approved in 2014. The proposed changes to the Land Use Schedules and Policies are proposed to recognize recent changes to Provincial planning policies and direction and the need for more housing in an efficient and effective manner, given the basis for the Secondary Plan was developed nearly 10 years ago and before any new Provincial policy direction.

The additional policy modifications to OPA # 80 include:

Proposed Policy addition – example ; Proposed Policy deletion - example

Policy	Existing Policy Wording	Proposed Policy Modification
11.2.2.2.4	<i>Cultural heritage resources</i> including all features identified as provincially significant shall be conserved through long term protection mechanisms (e.g. heritage conservation easements).	<u>Significant cultural heritage resources</u> <del>including all features identified as provincially significant</del> shall be conserved through long term protection mechanisms (e.g. heritage conservation easements).
11.2.2.3	The topography associated with the Eramosa River Valley within the GID offers appealing vistas towards the historic Reformatory Complex as well as the Downtown, providing a distinctive character to the area. Future development shall take advantage of favourable topography and <i>public views</i> and <i>public vistas</i> and minimize the need for re-grading on site, where possible.	The topography associated with the Eramosa River Valley within the GID offers appealing vistas towards the historic Reformatory Complex as well as the Downtown, providing a distinctive character to the area. Future development <u>is encouraged</u> <del>to shall</del> take advantage of favourable topography and <i>public views</i> and <i>public vistas</i> and minimize the need for re-grading on site, where possible.
11.2.4.8	A Main Street has been identified on the extension of College Avenue East into the site. The Main Street will function as a transition area between the lands designated	A Main Street has been identified on the extension of College Avenue East into the site. <del>The Main Street will function as a transition area</del> <u>between the lands designated</u>

Policy	Existing Policy Wording	Proposed Policy Modification
	Residential to the north and the Employment Mixed-Use 1 lands designated to the south. The Main Street area will accommodate a range of transportation options but should be considered a “pedestrian and transit priority street” and shall generally be designed and built in accordance with the standards outlined in Table 1 and in accordance with the Main Street policies of the Official Plan.	<del>Residential to the north and the Employment Mixed-Use 1 lands designated to the south.</del> The Main Street area will accommodate a range of transportation options but should be considered a “pedestrian and transit priority street” and shall generally be designed and built in accordance with the standards outlined in Table 1 and in accordance with the Main Street policies of the Official Plan.
11.2.4.9.3	A single loaded perimeter local road along the western edge of the Eramosa River Valley shall be considered to provide a public edge, opportunities for separated active transportation infrastructure, public view and public vista opportunities and greater protection opportunities of the Eramosa River Valley given single public ownership of the adjacent land.	<del>The A single loaded perimeter local road along the western edge of the Eramosa River Valley shall be considered to provide a public edge,</del> opportunities for <u>trail connections separated active transportation infrastructure,</u> public view and public vista opportunities and greater protection opportunities of the Eramosa River Valley given single public ownership of the adjacent land.
11.2.6.1.8 b)	Generally providing a single loaded local road on the table lands adjacent to the Natural Heritage System in the Mixed-use Employment area on the west side of the River to allow public access to views of the Eramosa River;	<del>Generally designing the providing a single loaded local road on the table lands adjacent to the Natural Heritage System in the Mixed-use Employment area on the west side of the River to allow public access to views of the Eramosa River;</del>
11.2.6.2.9	To ensure an attractive streetscape and maximize opportunities for passive energy efficiency/carbon neutrality, architectural controls may be required to be developed through the Block Plan process to address detailed building design aspects such as: massing; passive energy efficiency matters; siting; grading; elevation articulation; garage articulation; materials colour, sustainability and quality; and roof design.	To ensure an attractive streetscape and maximize opportunities for passive energy efficiency/carbon neutrality, <u>urban design guidelines may be prepared for consideration at site plan approval</u> architectural controls may be required to be developed through the Block Plan process to address detailed building design aspects such as: massing; passive energy efficiency matters; siting; grading; elevation articulation; garage articulation; materials colour, sustainability and quality.; and roof design.
11.2.6.2.10	Residential dwellings shall be designed such that garages are not	Residential dwellings are <u>encouraged to shall</u> be designed

Policy	Existing Policy Wording	Proposed Policy Modification
	<p>the dominant feature in the streetscape. Garages for all ground-related dwellings shall generally be in the rear yard accessed by laneway or front driveway.</p>	<p>such that garages <u>are setback from the street to minimize the garage as</u> <del>not</del> the dominant feature in the streetscape. Garages for all ground-related dwellings, <u>excluding single detached dwelling or street townhouse dwellings</u>, shall generally be in the rear yard accessed by laneway or front driveway <u>or be screened with appropriate landscaping</u>.</p>
<p>11.2.6.3.2.4.e)</p>	<p>Building heights shall contribute to a continuous street wall that has a minimum height of 4 storeys as shown on Schedule C.</p>	<p>e) Building heights shall contribute to a continuous street wall that has a minimum height of 4 <u>3</u> storeys as shown on Schedule C.</p>
<p>11.2.6.3.4.2</p>	<p>The following uses may be permitted within the Employment Mixed-use 2 designation subject to the applicable provisions of this Secondary Plan:</p> <ul style="list-style-type: none"> <li>a) Research and development facilities;</li> <li>b) Office and administrative facilities;</li> <li>c) Cultural and education uses;</li> <li>d) Institutional uses;</li> <li>e) Entertainment and recreational commercial uses;</li> <li>f) Associated ancillary retail uses that are an integral component of the primary uses; and</li> <li>g) Complementary or accessory uses may be permitted. Such uses may include convenience commercial uses and community facility uses.</li> </ul>	<p>The following uses may be permitted within the Employment Mixed-use 2 designation subject to the applicable provisions of this Secondary Plan:</p> <ul style="list-style-type: none"> <li>a) Research and development facilities;</li> <li>b) Office and administrative facilities;</li> <li>c) Cultural and education uses <u>and schools</u>;</li> <li>d) Institutional uses;</li> <li>e) Entertainment and recreational commercial uses;</li> <li>f) Associated ancillary retail uses that are an integral component of the primary uses; and</li> <li>g) Complementary or accessory uses may be permitted. Such uses may include convenience commercial uses and community facility uses.</li> </ul>
<p>11.2.7.2</p>	<p>The City may establish a design review committee, comprised of professionals with expertise in planning and urban design, architecture, engineering, landscape architecture and/or environmental design, or other advisory process, such as an architectural or urban design peer</p>	<p>The City may establish a design review committee, comprised of professionals with expertise in planning and urban design, architecture, engineering, landscape architecture and/or environmental design, or other advisory process, such as an architectural or urban design peer</p>

Policy	Existing Policy Wording	Proposed Policy Modification
	<p>review process at the applicant's expense, to assist in the review of significant development proposals and capital projects in the GID. In reviewing significant development projects within the GID, such a committee or process shall be guided by the policies of the GID Secondary Plan and applicable Official Plan policies and shall consider the urban design, architectural, engineering, landscape and environmental design aspects of the proposal.</p>	<p>review process at the applicant's expense, to assist in the review of <del>significant development proposals</del> <u>Site Plan Applications and capital projects</u> in the GID. In reviewing <del>Site Plan Applications</del> <u>significant development projects</u> within the GID, such a committee or process shall be guided by the policies of the GID Secondary Plan, <del>and</del> applicable Official Plan policies, <u>approved Urban Design Guidelines and matters associated with Site Plan Approval</u> <del>and shall consider the urban design, architectural, engineering, landscape and environmental design aspects of the proposal.</del></p>
11.2.7.3.4	<p>Block Plans are required to be developed to the satisfaction of the City and approved by the City for each of the identified Block Plan areas prior to approval of any development application within the corresponding Block Plan area.</p>	<p>Block Plans are <del>required</del> to be developed <del>to the satisfaction of the City and to be approved by the City</del> for each of the identified Block Plan areas <u>and may be considered concurrently with</u> <del>prior to</del> approval of any development application within the corresponding Block Plan area. <u>Block Plan Areas 1 and 2 may be considered as a comprehensive Block Plan.</u> A Block Plan may consider amendments to the Secondary Plan.</p>
11.2.7.3.5	<p>Block Plans will be prepared in accordance with a Terms of Reference approved by the City. Block Plans will demonstrate conformity with the policies and schedules of the GID Secondary Plan and will include, but not necessarily be limited to, the following:</p>	<p>Block Plans will be prepared in accordance <u>with the Guidelines for Preparation of Block Plans</u> <del>established a Terms of Reference approved by the City</del>. Block Plans will demonstrate <u>general</u> conformity with the policies and schedules of the GID Secondary Plan and will include, but not necessarily be limited to, the following:</p>
11.2.7.3.6	<p>Draft plan of subdivision, Zoning By-law amendment and site plan applications, or any phases thereof, for properties subject to Block Plans shall demonstrate to the City's satisfaction that the proposed development is generally consistent with the applicable</p>	<p>Draft plan of subdivision, Zoning By-law amendment and site plan applications, or any phases thereof, for properties subject to Block Plans shall demonstrate <del>to the City's satisfaction that the proposed development is generally</del> <u>consistent conformity</u> with the</p>

Policy	Existing Policy Wording	Proposed Policy Modification
	Block Plan and will contribute to meeting the principles, objectives and applicable policies and targets of the GID Secondary Plan. Block Plans may be amended through the development approvals process, provided the relevant policies of the GID Secondary Plan continue to be satisfied.	<del>Secondary Plan applicable Block Plan</del> and will contribute to meeting the principles, objectives and applicable policies and targets of the GID Secondary Plan. <del>The Secondary Plan Block Plans</del> may be amended through the development approvals process, provided the relevant policies of the GID Secondary Plan continue to be satisfied.
Schedules		
A	Proposed Schedule A is attached	A new Schedule to replace the existing Schedule
B	Proposed Schedule B is attached	This represents a further modification to Item 97 in the City's OPA #80
C	Proposed Schedule C is attached	A new Schedule to replace the existing Schedule

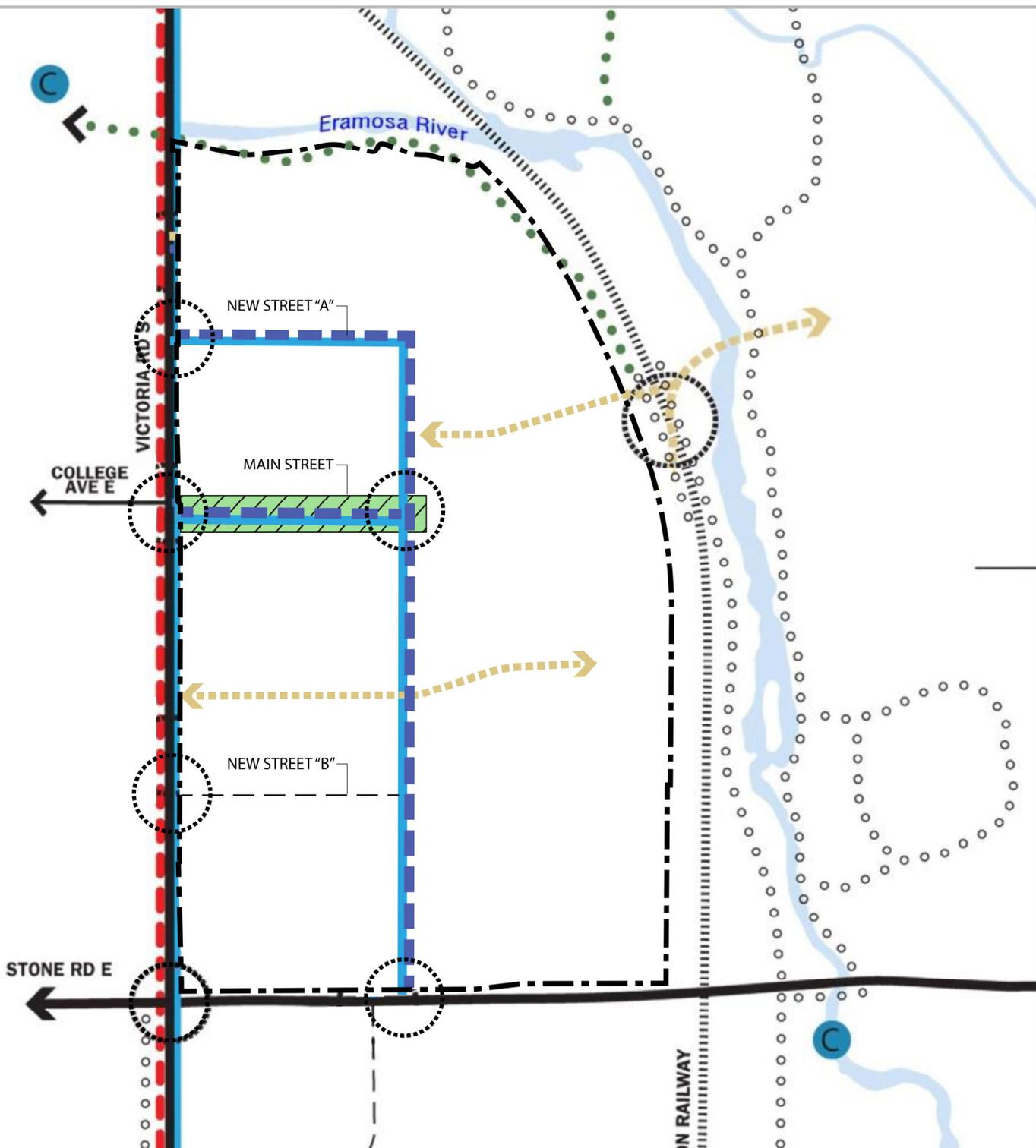


Figure  
**Proposed Amendment to Schedule A: Guelph Innovation District Secondary Plan - Mobility Plan**

City of Guelph Official Plan 2017

**GID Block 1 and 2**  
 City of Guelph

**LEGEND**

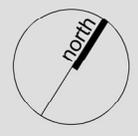
- Subject Lands
- | Legend |                                  |
|--------|----------------------------------|
|        | Secondary Plan Boundary          |
|        | Existing Arterial Roads          |
|        | Existing Local Roads             |
|        | Proposed Collector Roads         |
|        | Proposed Main Street             |
|        | Proposed Local Roads             |
|        | Proposed On-Street Bicycle Lanes |
|        | Existing City Trail Network      |
|        | Proposed City Trail Network      |
|        | Railway                          |
|        | Active Transportation Link       |
|        | Canoe Launch and Node            |
|        | Proposed Transit Stops           |
|        | Waterbody                        |

DATE: December 2022

SCALE: 1:10,000

FILE: 1405G

DRAWN: JB



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**MHBC** PLANNING  
 URBAN DESIGN  
 & LANDSCAPE  
 ARCHITECTURE

200-540 BINGEMANS CENTRE DR. KITCHENER, ON, N2B 3X9  
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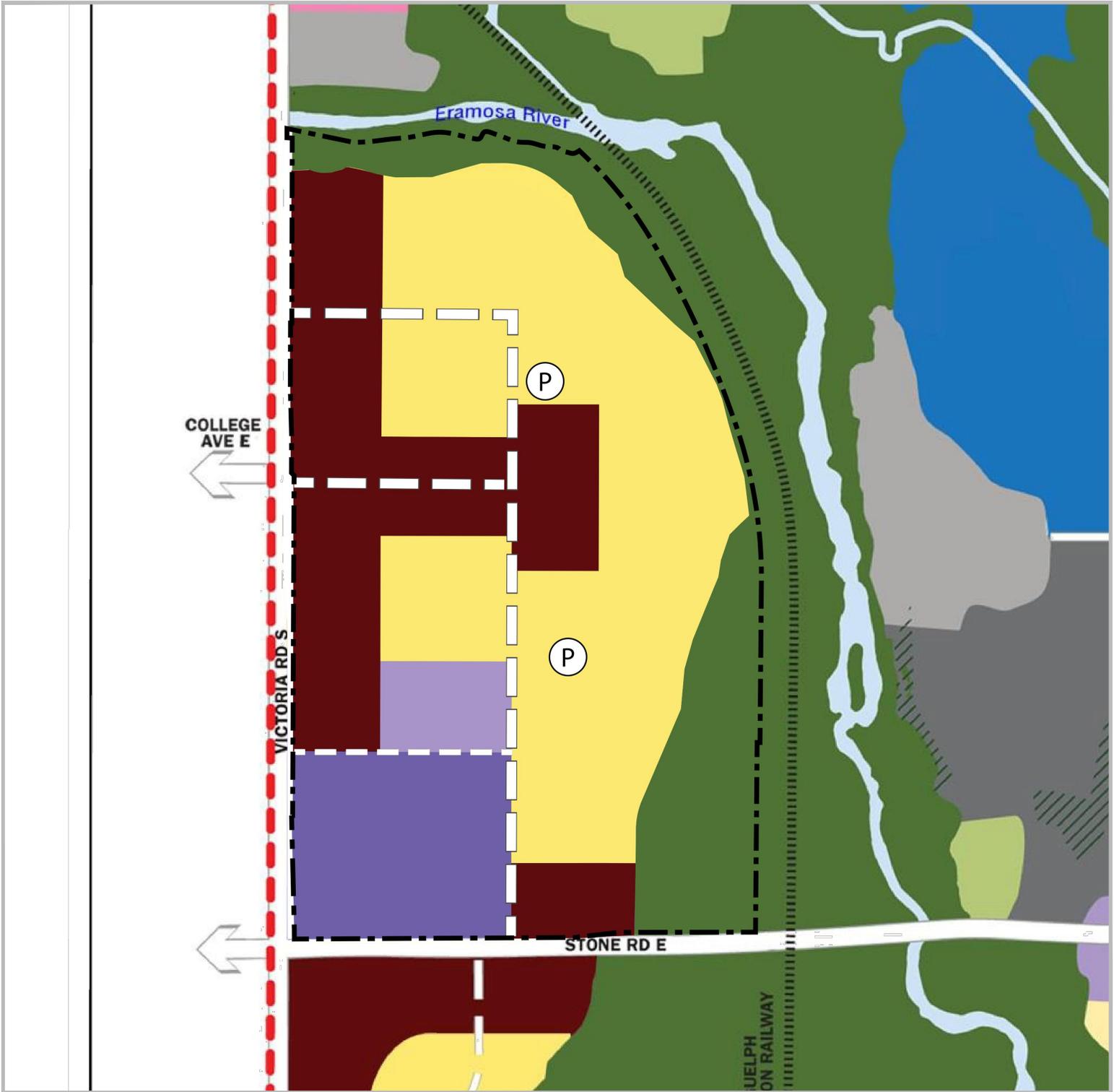


Figure  
**Proposed Amendment  
 to Schedule B: Guelph  
 Innovation District  
 Secondary Plan - Land  
 Use**  
 City of Guelph Official Plan 2017

City of Guelph Official Plan 2017

**GID Block 1 and 2**  
 City of Guelph

**LEGEND**

Subject Lands

**Legend**

**Land Use Designations**

- Open Space and Park\*\*
- Glenholme Estate Residential
- Residential
- Mixed-use Corridor (GID)
- Employment Mixed-use 1
- Employment Mixed-use 2
- Major Utility\*\*
- Industrial
- Adaptive Re-use
- Service Commercial
- Neighbourhood Commercial Centre
- Significant Natural Areas & Natural Areas
- Natural Areas Overlay

**Infrastructural Framework**

- Secondary Plan Boundary
- City Streets
- Future City Streets
- Existing Rail
- Waterbody
- Proposed Park

DATE: December 2022

SCALE: 1:10,000

FILE: 1405G

DRAWN: JB



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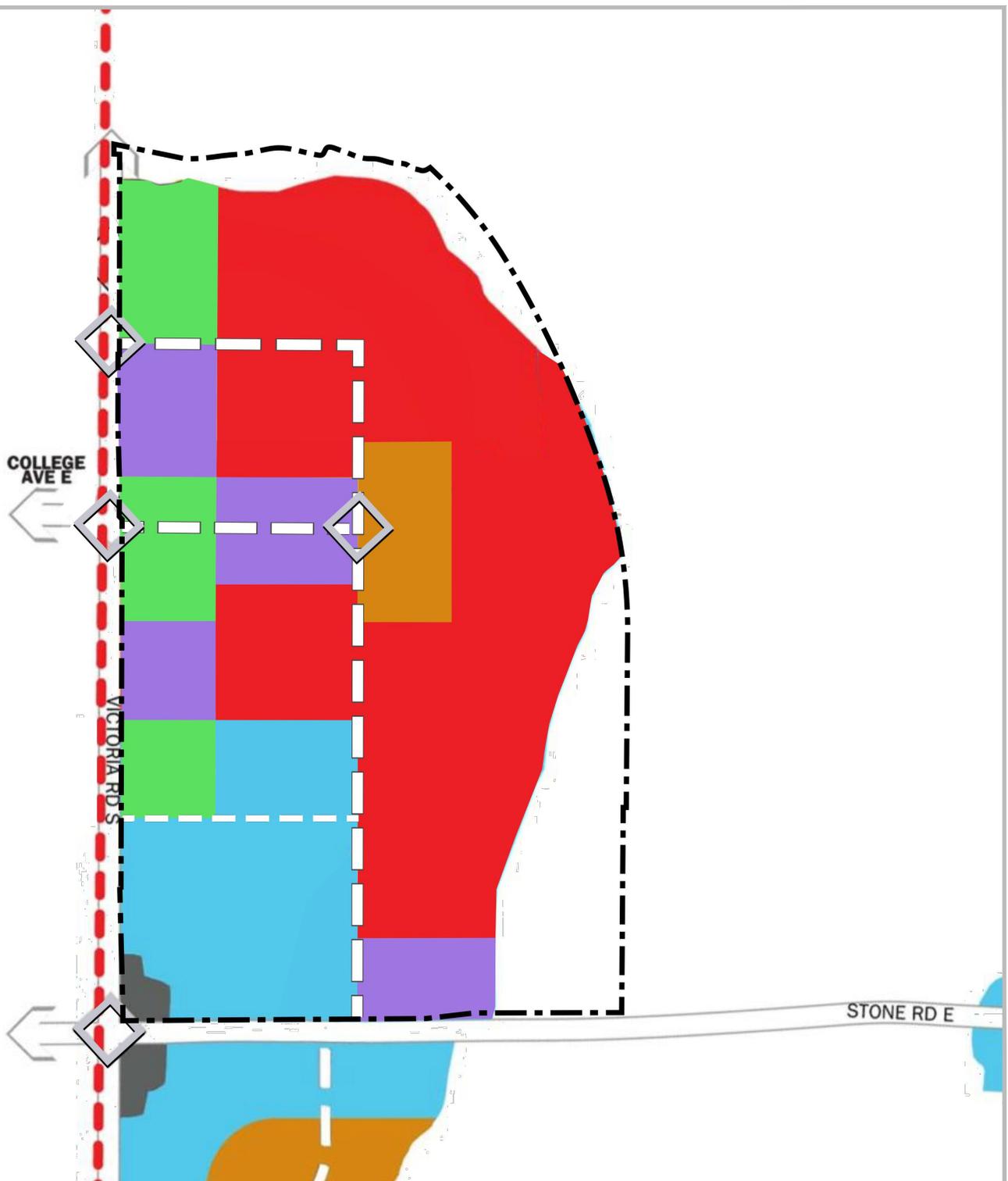


Figure  
**Proposed Amendment  
 to Schedule C: Guelph  
 Innovation District  
 Secondary Plan - Built  
 Form Elements**  
 City of Guelph Official Plan 2017

**GID Block 1 and 2**  
 City of Guelph

**LEGEND**

Subject Lands

- Legend**
- Secondary Plan Boundary
  - City Streets
  - Future City Streets
  - Node

- Building Heights**
- 2 min - 6 max Storeys
  - 2 min - 10 max Storeys
  - 4 min - 6 max Storeys
  - 4 min - 10 max Storeys
  - 9m min - 6 max Storeys

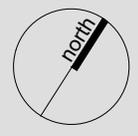
- Proposed Additional Heights**
- 3 min - 12 max Storeys
  - 3 min - 18 max Storeys

**DATE:** December 2022

**SCALE:** 1:10,000

**FILE:** 1405G

**DRAWN:** JB



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