

To the Guelph City Clerk,

Re. Development proposal for 26-40 Carden St. and 27-39 Macdonell St.

File No.: OZS24-012

I am writing these comments concerning the above proposal as someone who lives and works in Guelph's downtown core and as an architect licensed within the province of Ontario. I work from 10C, immediately adjacent to the site of this proposal.

I find the prospect of further investment in Guelph's downtown encouraging, particularly at a time when many businesses downtown are suffering, and many Guelph residents are, sadly, turned off the downtown because of the presence of encampments and so on. I also encourage new dense urban housing within the core (though I am not under the impression that housing geared specifically to students will alleviate much pressure on sprawl development, as those housing types serve different demographics) and addition of housing supply in our housing crisis.

Furthermore, I am encouraged that this proposal dispenses with parking entirely, moving us away from presumed car dependency and towards more human centered cities.

In general, while I find much to support with this proposal, I find the execution of the design is problematic in several regards, and below the level quality in design that I believe that we should expect on two of Guelph's most important and prominent urban streets, directly adjacent to key city icons such as the Basilica, City Hall, and the Court building.

In particular, some concerns I have with the design. They are as follows:

1. The design of the east and west facing units and elevations seem problematic:
 - a. Firstly, this design seems entirely predicated on a speculation that the two adjacent properties are, to use the language of the applicant's urban design brief, "unlikely to see redevelopment in the near term".
 - i. For one, this is entirely conjecture, and that conjecture is not particularly convincing
 1. For example, the urban design brief states that some adjacent buildings are listed heritage properties and therefore unlikely to be redeveloped; yet the applicant here has developed over existing heritage properties in the past (eg. Guelph's Grummer building) and development over heritage bases is common in many urban centres, so this line of reasoning is unconvincing.
 2. Moreover, the urban design brief states that the two adjacent sites are likely too narrow to be developed. Accumulation of smaller sites for larger developments is well known development approach, and there is no reason to believe it could not be pursued here, so I also find this approach unconvincing. Property boundaries are dynamic over the long term, not static. Even without property accumulation, with creativity and thought, it is

possible that the adjacent properties could potentially be developed higher within the existing property lines.

- ii. Additionally, this building should be expected to remain in place for decades to come, so designing the basic floor plan of the building around the "near term" is unwise.
 - b. If adjacent properties to the east or west were to be developed in the same manner as this proposal, the access to natural light and any kind of view would be severely degraded in both instances, beyond any reasonable design expectation (if the current proposal was constructed on adjacent sites, residents on neighbouring buildings would be able to reach across from their balconies and touch each other, from building to building, and natural light access would be that of a dim lightshaft). This is why the required setbacks on the site are 6.0m and not 2.0m as proposed, and why Guelph and other cities (eg. Toronto's *Tall Building Design Guidelines*) have developed guidelines on tower setbacks for areas of high-density development. Either the east and west setbacks should be increased to the required setbacks, or the design should eliminate east/west facing units in favour of a slab type design, where units face either north or south, with the east and west facades being party wall conditions against which future developments may abut (or a combination of both: ie. slab type plan from eg, L04-L09, point tower above with increased setbacks). In my opinion reducing the side setbacks for the tower from 6.0m to 2.0m should not be permitted here; either the setbacks should be greater than 2.0m, or they could be reduced to zero with a party wall condition to allow *both* the proposed development as well as adjacent properties to add height and increase density within the downtown more uniformly.
 - c. Furthermore, the east and west facing units at levels 02-04 are particularly grim, their only windows facing onto the blank party walls of the adjacent buildings, almost entirely shaded by the new balconies above, even if no future development occurs on any adjacent sites. This is clearly visible in the rendered elevations. These units would essentially have no outdoor views and would have only a dim hint of natural light through most of the day.
2. I can appreciate that the design of the three-storey podium is trying to draw on surrounding heritage influences, but the design seems problematic in a few regards:
 - a. The description and graphic representation of the historically inspired materials of the base as simply "grey stone" demonstrates that there has not been much thought given to these materials, or their integration. As is common knowledge in Guelph, and as the application's own heritage report states, limestone is the most historically significant stone used in historic loadbearing stone construction throughout the city. It takes a moment's observation to realize this limestone has a characteristic tan/beige/buff colour, and that it is not simply a bland generic "grey stone". While this can be remedied by material specifications and selection, the designation and graphic representation demonstrates a rather perfunctory and token approach to historic interpretation on a site of very high civic and historic importance.

- b. Many of the proportions of the historically inspired base are awkward, particularly the small sliver of building on the south elevation, to the east, which appears to be an afterthought to incorporate a required exit door. The proportions and mullion configurations of the second floor windows do not relate clearly to any historic vocabulary, but at the same time clearly try to portray some manner historic influence.
 - c. While the urban design brief states that the design attempts for a certain variety in the design expression, with a more contemporary tower and a historically inspired base, this pastiche of 'styles' lends *both* a feeling of inauthenticity. Many architects have elegantly executed contemporary reinterpretations of historic proportions, vocabularies and material – this would be a more appropriate approach here.
3. I can appreciate that 14 stories may seem reasonable, and that virtually all private developers of a site try to maximize height for profit, and that it can be politically difficult to argue against height in a housing crisis, but given the immediate context, and the precedent this would set in the historic areas of downtown, a lower height should be considered, for reasons of contextual scale, shadowing, civic prominence of the site adjacent to City Hall and the Basilica, etc. Baker street redevelopment proposals top out at 15 stories and they do not have such prominent urban frontage and are already surrounded by buildings of a similar scale. Moreover, as stated above, the east and west facades of this project as currently designed are designed on the assumptions that neighbouring sites will not redevelop, which is not the spirit in which downtown sites should be developed – why grant this proposal so much height if it is, in spirit, not granting its neighbours *any* additional height? If we are to increase density in the core, we should do it in a way that allows for more uniform density and does not discourage increased density on neighbouring properties, From a broader urban perspective, the more ideal development of this area would be a mid-rise type 6-10 storey tall uniform increase in height – similar to what is established in the current zoning - which would, in aggregate, add much more density to the core, with less shadowing, less wind impacts, less visual impact, etc.

I would encourage the city to ask the applicant to improve their proposal.

Regards,

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