

WOOD DEVELOPMENT GROUP
Creating Space for Life

December 10, 2024

TO: GUELPH CITY COUNCIL

RE: **Special Meeting of Council for Downtown Heights Study under Section 26 of the Planning Act -2024-488**

Mr. Mayor, Members of Council;

Thank-you for the opportunity to provide comments to the formal initiation of the Downtown Height Study. This review of height controls in the downtown is timely and we think necessary to see continued investment and progress in the City's Urban Growth Centre.

I'm writing to you at the outset of the study to express my hope that it will carefully and strategically consider the opportunities to increase height limits and be bold with the new limits. Guelph needs, and can comfortably accommodate, taller buildings than are currently permitted in appropriate locations to:

- Unlock vacant and underutilized lands where development is not currently viable because of significant upfront costs for remediation and infrastructure;
- Address the city's urgent need for housing;
- Achieve the City's goal of sustainable growth and the Province's minimum density target for Downtown;
- Support Metrolinx/GO in their continuing major investments in the rail corridor and levels of service; and
- Support Downtown businesses and the city's overall economic development.

Below I offer a historical perspective and elaborate on these points with additional comments I hope will be considered by the study team.

It would be remiss of me not to mention that years back I served various roles at the City, including Heritage Planner, Urban Designer and manager of Downtown Renewal during the development and implementation of many of these policies as well as working in detail on the historic height by-law. This letter is a bit lengthy because of this background, but hopefully provides a wider perspective to the issues under consideration.

A Brief History...

As a city, Guelph has a unique history intertwining land development and urban design, all starting with the famous John Galt Plan of 1827.



Figure 1 – The 1970s Downtown Zoning model, showing defined View Corridors (yellow), Wyndham special policies (green) and the Height Cap (top of clear acrylic) [Guelph Civic Museum – Item 2013.39.7]

- It wasn't until the 1970s that the 'designed' control of heights (Fig.1) arose as a response to contemporary developments that would have threatened certain views to the Cathedral. While view corridors were defined, height outside the corridors, while capped, was generally more permissive than the planning framework is today.
- The 1990s saw the wholesale reduction of height to a six storey limit everywhere, the result of dissatisfaction with the buildings of the 1970s and 80s, with the consequence being that largely no new private sector investment occurred over the subsequent decades.
- The Downtown Secondary Plan of the 2010s opened-up height in discrete areas, based on emerging opportunities and to respond to the unprecedented scale of infill growth directed by the Province's Places To Grow legislation. While buildings have taken shape under the plan, its apparent that the height modelling within the plan is limiting investment.

With almost 15 years into the plan, its time to review the efficacy and impacts of it's built-form policies.

Performance of Guelph's Urban Growth Centre

With over ten years of data, its clear that Downtown Guelph is not meeting its growth targets (Fig.2). This is significant given the role Downtown is supposed to play in Guelph's overall growth management strategy and shift to intensification.

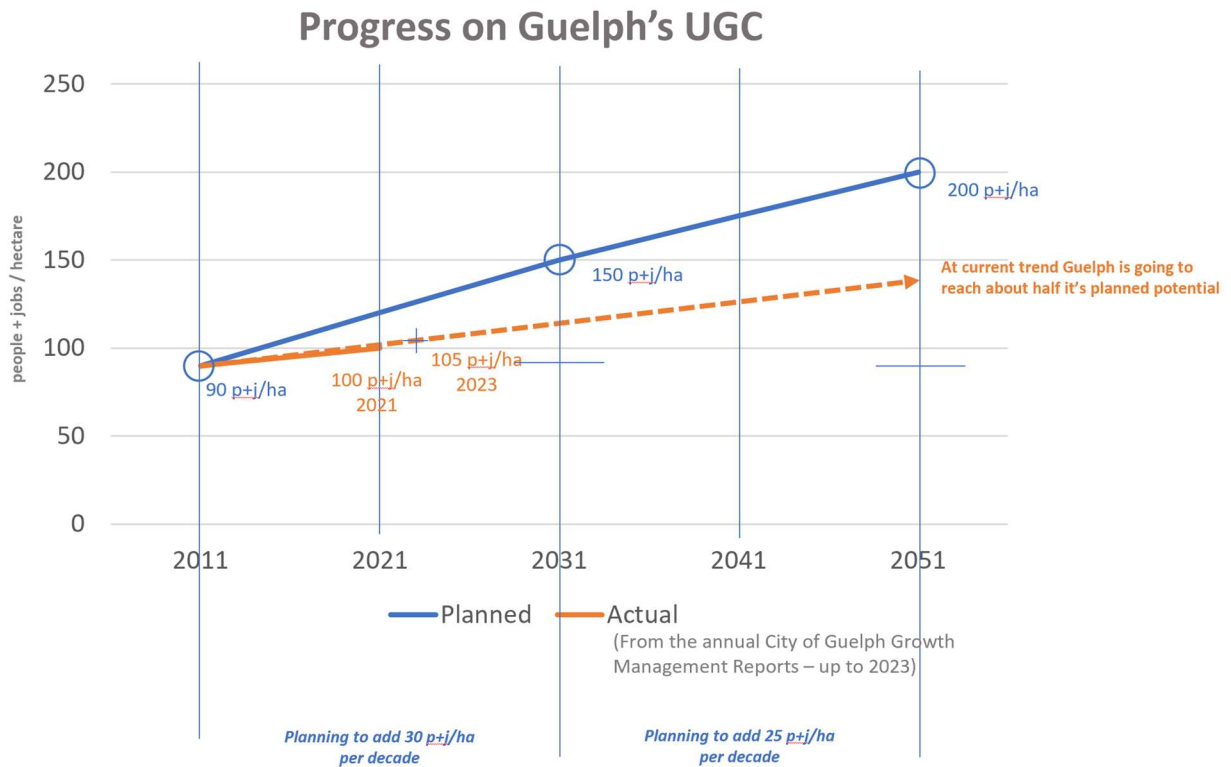


Figure 2 – Planned and Actual Density within Guelph’s Urban Growth Centre
[Wood Development Group based on City of Guelph data]

Its also important to note that the Downtown Secondary Plan was developed and approved years ahead of the announcement and incremental reintroduction of Metrolinx/GO rail service. Subsequent Official Plan updates have now named Downtown Guelph as the city’s **Major Transit Station Area**, a significant planning term meant to spur even more intensification investment around station areas across the system, yet none of the Secondary Plan built-form policies have been updated.

Our Plant No. 2 project demonstrates the role of density and height.

Transparently, we are currently engaged and consulting the community on the master plan concept for “Plant No. 2” our major redevelopment site in the Ward, bounded by Huron, Elizabeth, Duke and Alice Streets.

The recent presentation of the development concept (Fig.3), November 19, 2024, includes a centrally located 24 storey tower within the 9.7 acre parcel. This is 14 storeys more than currently identified in the Secondary Plan.

Our message to the community was twofold:

- The development needs a certain amount of density to distribute the significant costs of renewing and converting the lands to residential, public park and open space.
- Our massing proposal, which offers over 40% of the site area as open due to the site configuration, heritage retention and proposed parkland dedication, means the density needs to stack vertically.

We believe that this type of density can be successfully integrated into Guelph, and while consultations are ongoing, it is intended that this project will turn into a formal planning application to Council in 2025.



Figure 3 – Birdseye view of proposed Plant No. 2 Development Concept – November 19, 2024
Wood Development Group [[Plant2 Presentation](#)]

This story is not unique. Many sites within the downtown have significant constraints that need density and creative solutions to unlock their potential. The city owns some of them itself. Our feeling is that opening up more opportunities for density will support investment on sites that are currently idle.

Items for Consideration

There are several items we'd like to highlight around the views, height and design policies in the current plan.

1. View Corridors – There should be a review on whether all of the current protected views are relevant and accessible given the passage of time. We're identifying two especially that we think should be evaluated.

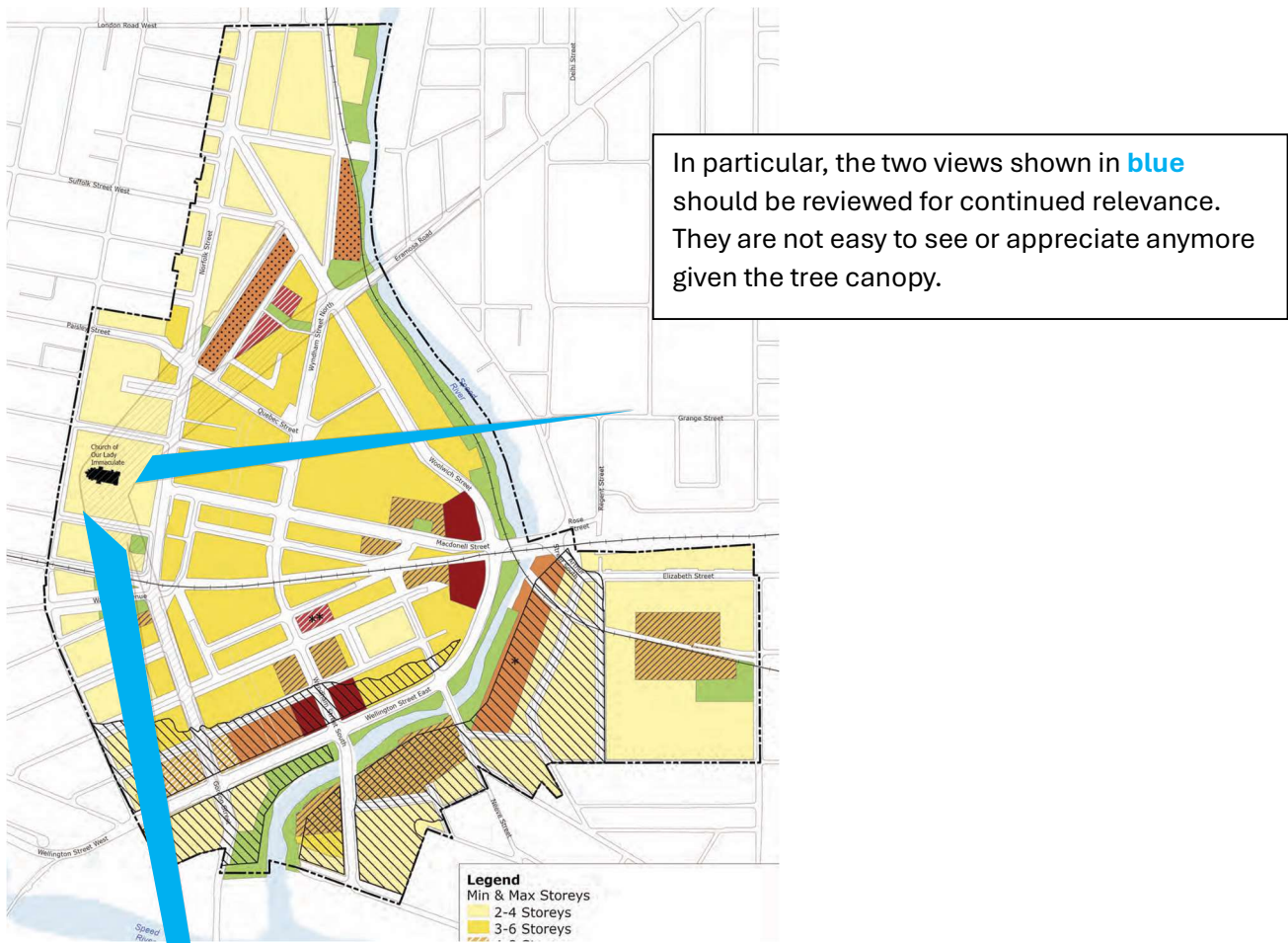


Figure 4 – Downtown Guelph Secondary Plan – Schedule D
[Guelph Official Plan]

2. Height – the detailed height design of the 2012 DSP needs to be relaxed.
 - Confining the 18 storey sites to ‘gateway’ positions at major intersections is too limiting.
 - Outside of the defined view corridors, and outside the historic streetscapes, what is the appropriate height in a Major Transit Station Area? (Other cities are moving towards over 25 storeys or no height limits at all for instance).

3. Built-form Policies – there are some form policies within the plan that should also be reviewed, such as:
 - Floorplate constraints – holding floorplates of tall buildings to a maximum size (1,000m² currently) is likely too restrictive for the small amount of sites downtown that could actually develop tall buildings.
 - Angular Planes – An antiquated planning control where dense urban fabric is the goal.
 - Tower adjacencies and Parti- or Street-wall configurations – more guidance around appropriate building forms in different parts of the downtown may be appropriate.

Are some areas more suitable for point towers spaced apart or should some areas guide buildings to form continuous street walls?

These are some of the policies that are already included, or should be considered within new framework for a denser downtown.

In Conclusion

Thank you again for the opportunity to provide these lengthy comments at the kick-off of the project. We look forward to more discussion and substantive review of policy through the process.

A handwritten signature in black ink, appearing to read 'Ian Panabaker', with a small arrow pointing upwards and to the left.

Ian Panabaker, CAHP, MRAIC
Vice President, Development
Wood Development Group

cc. Tim Smith, Urban Strategies Inc.