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Submitted via e-mail.

**Re: City of Guelph – Downtown Height Study
Comments on Proposed Official Plan Amendment
26-40 Carden Street & 27-39 MacDonell Street, Guelph**

On behalf of our client, Skyline Retail Real Estate Holdings Limited, please accept this Letter with respect to the City of Guelph’s ongoing Downtown Height Study. We have reviewed the draft Official Plan Amendment (OPA) dated January 21, 2025, obtained through the consultation website for the initiative. This Letter provides comments on the proposed OPA specific to lands, 26-40 Carden Street and 27-39 MacDonell Street, owned by our client, as well as more broadly about the height study and preliminary directions of the proposed OPA.

1. Site Context and Location

My client owns the property municipally addressed as 26-40 Carden Street and 27-39 MacDonell Street, Guelph which is legally known as Lot 116, Registered Plan 8, City of Guelph. The location of the subject property is shown on Figure 1 below. The subject property is considered a “through lot” with frontage onto both Carden Street and MacDonell Street in the downtown area of Guelph.

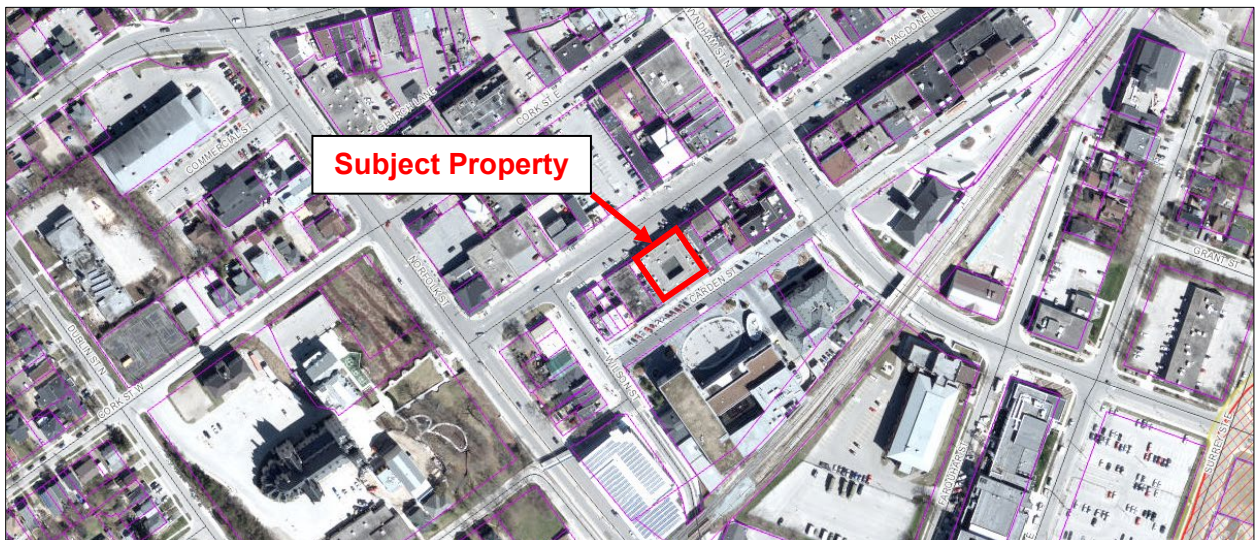


Figure 1: Location of Subject Property and Neighbourhood Context (Source: GRCA GIS Portal)

The subject property currently consists of a two (2) storey, red brick office/commercial building constructed in the 1950's. The building is mostly vacant at this time and would require considerable renovations to accommodate new tenants. Images showing the front and rear of the building are shown on Figures 2 and 3 below. The existing building extends fully to all lot lines and has been internally subdivided into multiple commercial and office units.



Figure 2: Existing Building viewed from Carden Street (Source: Google Streetview)



Figure 3: Existing Building viewed from MacDonell (Source: Google Streetview)

The subject lands are located mid block between Wyndham Street North (to the east) and Wilson Street (to the west). Within this block, building heights range from one to four storeys in height, with many buildings having heritage attributes. To the immediate east, along Carden Street, is a recently renovated 4-storey building which has been retrofitted to consist of extensive glazing overlooking the public realm. To the immediate west is a 2-storey yellow-brick building, consisting of a modern storefront, restaurant and associated patio area. The block consists of a mix of retail, office and commercial uses on the north side of the street.

The subject lands are located immediately north of the City's main administrative building (City Hall) as well as Market Square. Market Square is an urban plaza located in front of the City Hall, which is a multi-season community space, consisting of a splash pad/water play for summer months, which is used as an outdoor rink throughout the winter. To the east of the site is the Guelph Central Station which is a multi-modal transportation hub, providing freight and commuter rail service to and from the City, and also serving as a central hub for Guelph Transit. Central Station provides stops for various City Bus routes.

To the west of the subject lands is the Basilica of Our Lady Immaculate, which is a 19th century gothic-revival style church. The church property is surrounded by a number of civic and community uses, including the John McCrae Statue, the Guelph Civic Museum, St. John Bosco School and Northumberland Park. The church itself is a focal point within the context of Downtown Guelph due in part to its ornate architectural detailing, distinctive twin-towers, and prominent location atop a hill overlooking downtown Guelph to the east.



Figure 4: Basilica of Our Lady Immaculate (Source: Google Streetview)

2. Active Official Plan and Zoning By-Law Amendment Applications

As you are aware, my client submitted an Official Plan Amendment and Zoning By-law Amendment (OPA/ZBA) Application (File No. OZS24-012) was submitted by our firm on behalf of the owners for the redevelopment of the subject property to permit a 14-storey, mixed use development consisting of 120 dwelling units and 595 sq. m of at-grade, commercial space. A Notice of Complete Application and Public Meeting was issued on July 31, 2024. We attended the Statutory Public Meeting on September 10, 2024, on behalf of the owners to provide an overview of the proposed development for Council and members of the public.

Following the Statutory Public Meeting for the OPA/ZBA Application, we were informed by City Staff of the City's Downtown Height Review project, which directly effects the subject property and/or proposed redevelopment. As such, our client opted to put the active OPA/ZBA Applications on hold and participate in this initiative. Notwithstanding, we fully maintain that the contemplated scale of development is appropriate for the subject property.

3. Comments on Draft Official Plan Amendment

We understand that the intent of the Downtown Height Study (and the associated OPA) is to identify areas of the Downtown where additional height may be appropriate with the objective of planning to achieve a population density target of 200 people and jobs per hectare by 2051. This density target is set out in the current Guelph Official Plan and is a key directive of the Province for strategic growth areas including major transit station areas and downtowns / urban growth centres. We do note that this is not a maximum density target but rather a minimum goal that the city should be aiming to achieve. As a general statement, our client is generally supportive of this initiative of the City and more broadly, supportive of additional residential density in the downtown.

We have reviewed the draft OPA which was posted on the City's neighbourhood consultation website. We note that no background study has been included on the website, nor rationale for the changes in height contemplated through the OPA. Reading a draft OPA without this information is akin reviewing a proposed OPA for a development application with no supporting plans, studies or reports. Understanding how the recommended changes were arrived at is fundamental to ensuring a transparent and evidenced-based approach to policy making. We would recommend that the City consider the approaches of many other communities who have undertaken similar reviews in the past couple of years, such as the City of London, City of Waterloo and City of Kitchener. In each of these communities, background reports speaking to the planning and urban design rationale behind the proposed changes, visuals showing ultimate build-out scenarios, and ultimately why additional height is appropriate in certain locations and not others.

As per the current Schedule 'D' (Downtown Secondary Plan) shown below in Figure 5, the subject property is permitted a minimum and maximum building height of 3-6 storeys. As per the proposed Draft Schedule 'D' shown below in Figure 6, it is understood that the proposed OPA does not contemplate any change to the permitted minimum and maximum building heights of 3-6 storeys.



Figure 5: Current Schedule 'D'



Figure 6: Draft Proposed Schedule 'D'

We maintain that the subject property – and the broader Carden / MacDonell – is an appropriate location for additional height and density, and that the height contemplated by the private development application for 26 Carden is fully appropriate within its context for the reasons set out in the Planning Justification Report and Urban Design Brief prepared as part of these complete applications.

While the City is not contemplating any changes to the permitted height on our clients lands, we note that the lands directly across the street on MacDonell are now proposed to permit taller buildings from 4-8 Storeys, which includes lands owned by the City. We would ask that City Staff provide clarification with respect to the planning rationale and/or appropriateness of permitting taller buildings mid-block for a maximum on the North side of MacDonell St, and not on the South side, being our client's lands. Both lots have frontage along MacDonell St and are adjacent to the "Protected Public View Corridor" pertaining to the Basilica.

We recommend that the proposed designation permitting "4-16 Storeys" be applied to the subject property as well as the majority of the lands between Carden Street (south) and Cork Street (north), west of Wyndham Street and east of Norfolk Street, as illustrated below in Figure 7.

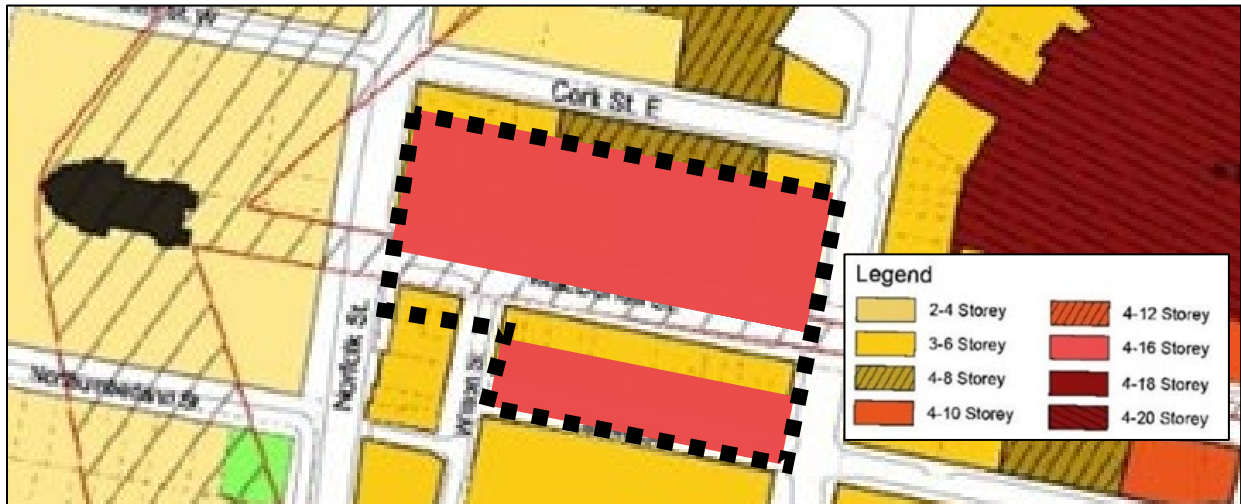


Figure 7: Recommended Heights for Carden - Norfolk – Cork – Wyndham Block

In our opinion the height is appropriate in this context for a number of reasons as discussed ad-nauseum in our Planning Justification and Urban Design Reports. In order to minimize impacts on the public realm and to integrate taller buildings while being sympathetic to the existing character of the downtown, it is recommended that:

- step-backs above the podiums be provided to minimize massing impacts and to maintain the historic street wall
- adaptive reuse of heritage buildings and facades be encouraged to maintain the existing character of the downtown
- building materials be reflective of and complementary to existing conditions
- active uses be provided at grade to support a lively downtown

4. Conclusion

As detailed in this letter, our client is generally supportive of the City's ongoing review of the policy and regulatory framework for its building heights within the Downtown, and appreciative of the work of City Staff to advance these important projects. We maintain that the height proposed by the site-specific OPA and ZBLA are appropriate for the site, and we recommend that the designation permitting "4-16 Storeys" be applied to the subject property and the surrounding area described above. It is our opinion that the proposed request is appropriate and represents good planning. We trust that the information provided in this Letter will be considered as you advance this project, and we look forward to meeting with staff and the City's retained consultant to understand the basis for the proposed OPA and to provide further comments as the project advances. Should you have any questions or to discuss, please do not hesitate to contact the undersigning.

Sincerely,



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Senior Planner



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