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Submitted via e-mail.

**Re: City of Guelph – Downtown Height Study
Comments on Proposed Official Plan Amendment
36-50 Wellington Street East, Guelph**

On behalf of our client, Vive Development Corporation, 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, 36-50 Wellington Street E, owned by our client, as well as more broadly about the height study and preliminary directions of the proposed OPA.

1. Subject Property and Neighbourhood Context

Our client owns the property municipally known as 36-50 Wellington Street E., Guelph and has the intention to redevelop the lands as a high-density purpose built rental apartment building. Under the existing planning framework that applies to the site, the lands are designated to permit a minimum height of four (4) storeys and a maximum height of twelve (12) storeys. The subject lands are located west of the intersection of Wellington Street and Wyndham Street, within the City’s Downtown / Urban Growth Centre. The location of the subject property is shown on Figure 1 below. The subject property is considered a “through lot” with frontage onto both Wellington Street E and Surrey Street E in the downtown area of Guelph.

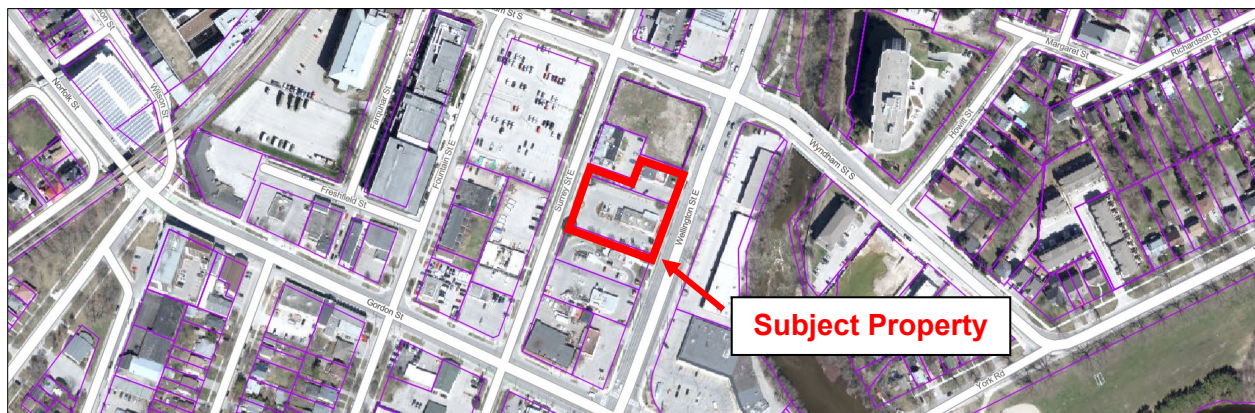


Figure 1: Location of Subject Property and Neighbourhood Context (Source: GRCA GIS Portal)

The site currently consists of two (2) fast food restaurants (Wendy's and KFC) and large surface parking areas. The Wendy's also has a drive-through facility on the south-side of the building. The site can be accessed from both Wellington Street E and Surrey Street E. Images showing the front and rear of the buildings are shown on Figures 2 and 3 below.

Surrounding uses include vacant lands to the north, fast-food restaurants and commercial uses to the east and south, and townhouses, an office, and a parking lot to the west. The surrounding area is predominantly made up of non-residential uses that serve the southern portion of the downtown area.



Figure 2: Existing Building on 36 Wellington St E facing North-West (Source: Google Streetview)

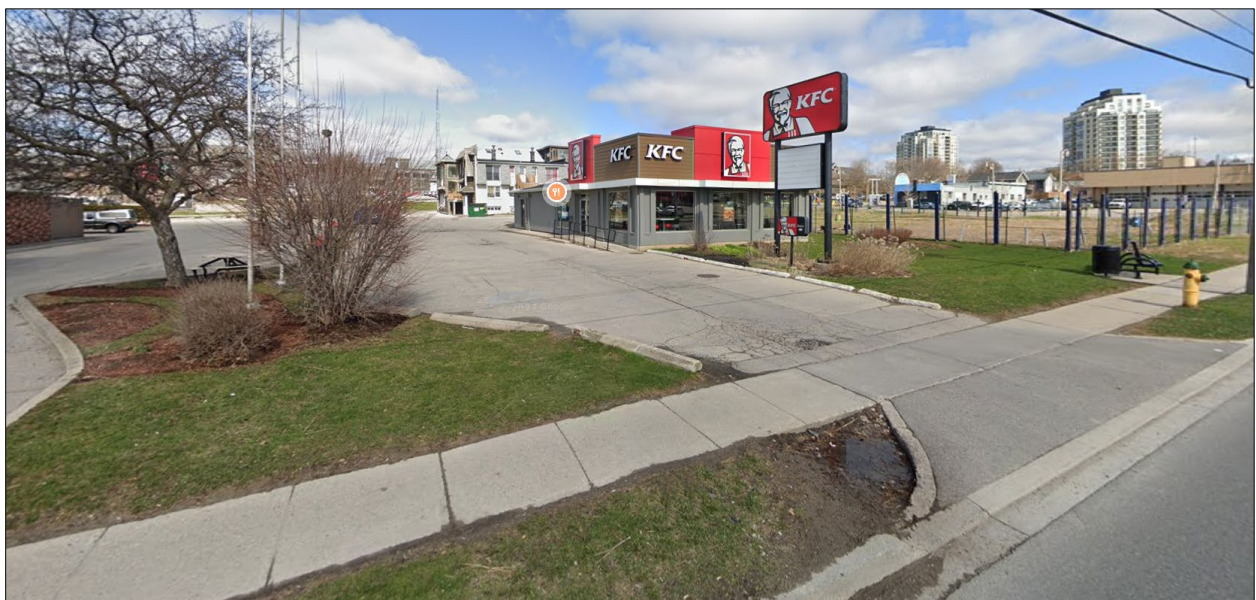


Figure 3: Existing Building on 50 Wellington St E facing North-West (Source: Google Streetview)

2. 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.

It is noted that the Draft OPA contemplates a reduction in the permitted height on the subject property to a maximum of ten (10) storeys. The existing permitted heights and proposed heights for my clients lands are shown below on Figures 4 and 5 respectively, with the subject property outlined in blue.

It is unclear why the City is contemplating the reduction of permitted heights for the subject lands, while simultaneously recommending additional heights for lands in close proximity to the site. For example, we note the City is proposing to increase the height permissions of the lands to the immediate west from the current density target of "3-6 Storeys" to "4-16 Storeys". Further, the City is proposing to increase the height permission of the lands to the north-west from "4-10 Storeys" to "4-20 Storeys". We would ask that City Staff provide clarification with respect to the planning rationale and/or appropriateness of permitting taller buildings directly adjacent of the site for "4-18 Storeys", as well as the west side of Surrey St E, and not on the east side, being our client's lands.

Furthermore, we note that additional lands owned by our client at 14 Neeve Street remain at "3-6 Storeys", with no proposed change. Conversely, the City owned lands, being the municipal parking lot adjacent to 14 Neeve Street, are now proposed to accommodate an increased height of "4-18 Storeys". Like above, we would ask that City Staff provide clarification with respect to the planning rationale and/or appropriateness of permitting taller buildings ("4-18 Storeys") directly adjacent to the 14 Neeve Street for such a significant contrast in height permissions. It is our

opinion that this entire block north of Neeve Street should be evaluated in a holistic manner for higher density/height. Most notably, these lands at 14 Neeve Street are within a 5-10 minute walk of the Guelph Central Station, are adjacent to an existing mixed-use high-rise development at 150 Wellington St E, and represent a prime location for increased height and density.

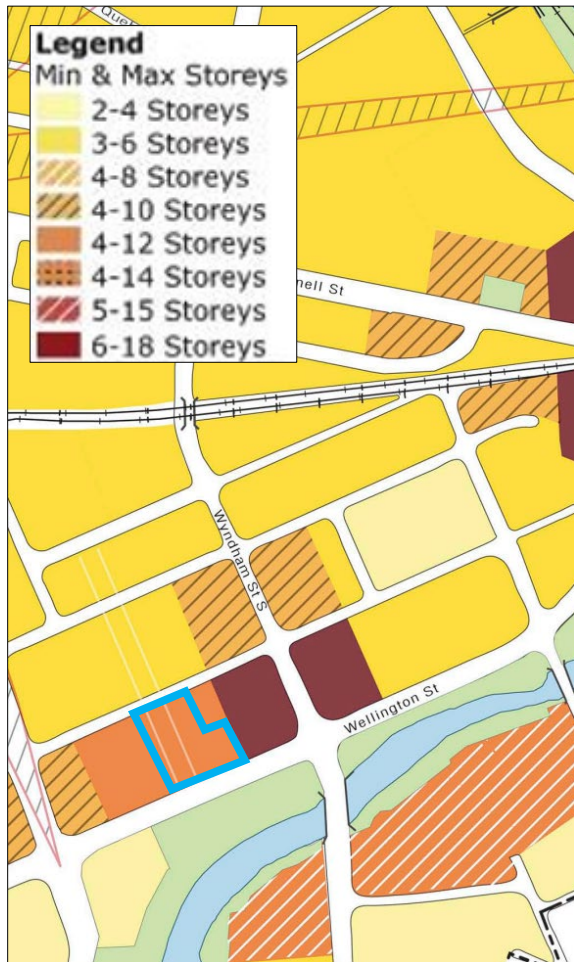


Figure 4: Current Schedule 'D'



Figure 5: Draft Proposed Schedule 'D'

We recommend that all lands in the eastern portion of the downtown area permit “4-35 Storeys”, including the subject property. As illustrated below in Figure 6, this area would be bounded by the railway corridor and Wellington Street E, which follows the natural pathing of the Speed River. The lands towards the south abutting Gordon St, as indicated in blue below, should step down in height and permit “4-20 Storeys” to provide a transition to the stable low-rise residential uses further south of Gordon St. It is our opinion that the two (2) main arterial roads, Gordon St and Wyndham St, leading to the downtown function as a gateway to the downtown area and provide a direct path from the University of Guelph, thus creating an opportunity for additional housing.

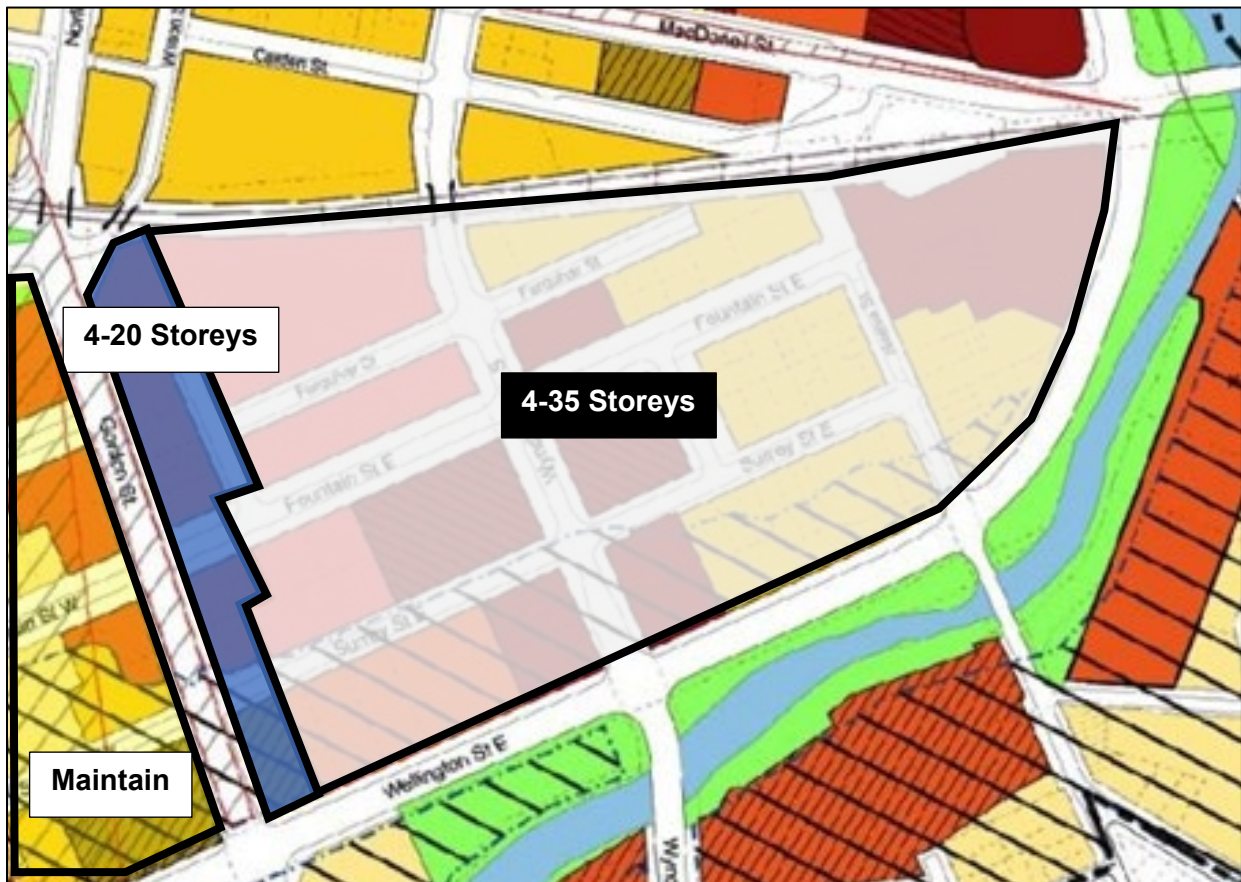


Figure 6: Recommended Heights for Downtown (Eastern Area)

In our opinion, the subject lands and much of this eastern area of downtown Guelph would be suitable to accommodate considerable redevelopment with taller buildings (such as the proposed “4-35 Storeys” height permissions), compared to the more historic area of the downtown, west of the rail corridor. It is our opinion that the contrasting urban fabric on either side of the railway corridor provides a clear rationale for differentiating building heights. The west side represents a greater concentration of buildings of heritage importance, which is largely distinct than the areas east of the rail line. Conversely, the east side of the railway corridor, which is predominantly characterized by contemporary buildings or those with little to no historical value, presents an opportunity for intensification through taller building heights. Cities of similar context, like the City of Kitchener and London, are actively working to concentrate growth and increase housing options near transit hubs, such as Light Rail Transit, Bus Rapid Transit and GO Station connections.

Allowing taller buildings on the east side of the rail corridor would support the City's growth objectives by providing more housing and commercial spaces in an MTSA, particularly given the proximity to Guelph Central Station. Strategically permitting greater height on the east side also facilitates a balanced transition between historic and modern developments, reinforcing good urban design principles. The additional height permissions would not only provide opportunity for employees in the downtown, but also University of Guelph students being 5-minutes away by public transit or 10-minutes by cycling from the University and downtown. By concentrating taller buildings in less sensitive areas, the City can maintain an appropriate scale on the north side while maximizing development potential elsewhere in the downtown.

It is further our opinion that there are minimal sensitive interfaces on the east side of the rail line, which justifies allowing taller building heights in this area. The eastern area is naturally bounded by the Speed River to the north and east, as well as the railway corridor to the west, creating a distinct separation from the more sensitive historical core on the western side of the downtown. These physical barriers act as natural buffers, reducing potential impacts of taller buildings on adjacent properties and ensuring that intensification can occur without disrupting historically significant streetscapes. Being that the subject lands are in close proximity of the Speed River, this also offers opportunities for taller buildings to capitalize on scenic views while enhancing the public realm with improved waterfront connections and pedestrian-oriented design.

3. Preliminary Design Concept

To contextualize the above noted analysis, our client has prepared preliminary massing models for a 29-storey mixed-use development, as shown in Figure 7 below. Though we are requesting an increase to permit a maximum of 35 storeys, the intent of this concept is to demonstrate how increased height permissions can be achieved on the subject lands. Based on our review of this preliminary model, we are of the opinion that the proposed height and density is supportable and aligns with the Provincial and City objectives for development within an MTSA.

Such a conceptual plan could provide approximately 400 dwelling units. Vertical development well supported by amenities, transit, and contributing to the vitality of a downtown core while reducing the pressure of urban sprawl.

Current height restrictions, combined with financial pressures to meet minimum unit counts for project viability, often push developments toward smaller unit designs—typically one-bedroom or studio apartments. While these units meet certain market demands, they fall short of addressing the diverse needs of Guelph’s growing population, particularly families and long-term residents seeking larger, more adaptable living spaces. Larger, more functional units encourage long-term residency, reducing the high turnover often associated with smaller units.

As shown in the Figure below, by incorporating a 4-storey podium into the design ensures a harmonious relationship with adjacent uses and maintains a human-scaled streetscape. This podium helps define a pedestrian-friendly environment by preserving sightlines and reducing the perceived height of the tower at street level. Additionally, the podium can accommodate commercial spaces, activating the streetscape and fostering engagement between the development and its surroundings.

Above the podium, the massing steps back to a 10-storey mid-rise section, creating a transition between the lower street-level elements and the high-rise tower. This stepped design not only reduces shadow impacts on adjacent properties but also minimizes the visual bulk of the overall structure, maintaining a balanced skyline. The strategic use of setbacks at this level helps ease the transition from nearby buildings, notably from those along Surrey St E.

At its peak, the 29-storey tower is positioned to optimize views, while limiting its impact on neighboring properties. The footprint of the tower would be less than 1,000 sq. m and provides 12.0 m setback from interior side yard property lines to allow for adequate light and separation from a potential neighbouring high-rise development. By stepping back from the lower podium

and mid-rise sections, the tower appears less imposing from the street, preserving the pedestrian experience. The massing of the tower is oriented away from Surrey St E and pushed towards the Wellington St E frontage, being a higher order road. As mentioned above, given that this portion of Wellington St E is naturally bounded by the Speed River to the south/east, there are little to no sensitive interfaces impacted by such massing. This approach ensures that the development not only accommodates density within an MTSA, but does so in a way that respects the scale and character of the existing built environment.

We also note the adjacent property to the north, 58 Wellington Street E., currently permits up to 18-storeys and the City is proposing to increase the permission to 20-storeys. Though it is our opinion that 35-storeys on these adjacent lands should be permitted, our client's preliminary massing models have consideration for such future and/or planned development on the adjacent lands by shifting the tower away from 58 Wellington St E. In our opinion, this will provide adequate tower separation between the two sites and allows for a gradual transition through the use of a 4-storey podium and stepped 10-storey mid-section along that adjacent interface.

The subject lands adequately sized to accommodate a high-rise development while maintaining appropriate setbacks and separation from neighboring properties, ensuring that the proposed building will not inhibit the future high-rise development potential of adjacent sites.



Figure 7: Preliminary Massing Model view from Wellington St E (Source: Reinders + Associates Ltd.)

4. Precedent for Tall Buildings in Other Similarly Sized Communities

As the heights study/review continues, it is essential to consider how other similar mid-size communities in the greater golden horseshoe have approached the subject and to build off of successes and/or pivot from strategies that have been ineffective.

As noted, several mid-size communities including the Cities of Kitchener, Waterloo and London have conducted height reviews within the past couple of years resulting in significant changes to local planning frameworks. These exercises have aimed to balance the pronounced need for housing options with the goals of providing good urban design, heritage conservation and other pertinent city-building objectives.

The City of Kitchener, as an example, recently undertook its 'Growing Together' initiative which considered the appropriate built form for its MTSAs. This initiative introduced a range of new land use designations and zones that have paved the way for extensive intensification in the City's most walkable and transit-supported neighbourhoods, and recognized that its downtown and MTSAs are truly the correct location for the majority of growth in the community. In certain instances, development is no longer subject to height restrictions unless the height of buildings is in conflict aviation restrictions. At the same time, the initiative did not simply permit height everywhere, but established complementary design direction and zoning to support ensure that sites are suitable to accommodate a high degree of intensification based on lot areas and geometries, the provision of appropriate tower separation, minimization of overlook, appropriate transitions to low rise and stable areas amongst other matters. As per City Staff, this initiative will facilitate the development of over 100,000 new homes, including at least 20,000 in "missing middle" forms, thus contributing to the housing targets set out by the Province. This initiative has won various awards, including the PlanON Project of the Year issued by the Ontario Professional Planners Institute.

By considering the approaches of similar and nearby communities we can identify best practices for integrating tall buildings into the urban fabric while addressing urban design principles, housing supply, transit connectivity, and public realm enhancements.



Figure 8: 181 King Street South, Waterloo



Figure 9: 8 Queen Street North, Kitchener



Figure 10: 64 Barrack Street & 235-237 Wellington Street, Kingston

Figures 8-10 above show recent developments/development proposals in comparable communities which demonstrate that tall buildings, heritage, and a sense of place need not be mutually exclusive. Rather, these developments illustrate how important community attributes can be thoughtfully maintained and incorporated into growing places.

Balancing the City of Guelph's downtown urban fabric with infill development is certainly a challenge many mid-sized cities in Ontario also face as they seek to accommodate growth while preserving their historic character. As per the precedent imagery above, cities such as London, Kitchener, and Kingston have implemented strategies, policies, and guidelines to guide higher density development in a way that respects the existing character and historical assets while promoting intensification. These cities employ various tools, including urban design guidelines and tall building guidelines, to manage change in their urban fabric.

Across these cities, urban design guidelines and tall building policies play a crucial role in ensuring high-quality design in mixed-use developments. These guidelines promote pedestrian-friendly streetscapes, high architectural standards, and contextual sensitivity. Strategies such as height transitions, step-backs, and the use of high-quality materials ensure that new development does not overpower historical assets, as well as low-rise development in the neighbouring area. Public realm improvements, including enhanced landscaping, lighting, and active ground-floor uses, further contribute to a cohesive urban environment.

By adopting similar approaches, the City of Guelph can facilitate intensification while ensuring high-quality design and heritage protection. The implementation of clear urban design guidelines, heritage conservation policies, and tall building strategies will allow the City to grow sustainably while maintaining their unique character.

5. 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 recommend that a designation permitting "4-35 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 City 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 undersigned.

Sincerely,

A solid black rectangular box redacting the signature of Christian Tsimenidis.

Christian Tsimenidis, BES
Senior Planner

A solid black rectangular box redacting the signature of David Galbraith.

David Galbraith, MCIP RPP
President