

February 7, 2025

City Clerk's Office  
City of Guelph  
1 Carden Street  
Guelph, ON N1H 3A1

Attention: Brenna MacKinnon, Project Manager  
Stacey Laughlin, Downtown Revitalization Advisor

**Re: Downtown Height Study and Draft Official Plan Amendment  
Public Meeting, February 11, 2025 (Item 4.1)**

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Urban Strategies Inc. is pleased to provide the following comments on the Downtown Height Study and Draft Official Plan Amendment (OPA). We are the planning and urban design consultant for the Wood Development Group, owner of the former Wood Plant No. 2 site in Downtown, which comprises the properties at 33 Elizabeth Street, 45 Elizabeth Street, 64 Duke Street, and 69 Huron Street. We were also the City's consultant on the current Downtown Secondary Plan and as such have an ongoing interest in the success of Downtown.

### **General Comments**

We support the City's review of Downtown height limits and appreciate the opportunities we've had to provide input to the study. Ten years since the Secondary Plan was approved, it is time to increase height limits to unlock the potential of prime development sites, increase the supply of housing, and continue the revitalization of Downtown. The Height Study team has done excellent work in identifying areas for greater height and in some areas has significantly increased height limits in the Draft OPA, including on the Plant No. 2 site. In our opinion, however, more work is needed to ensure the OPA has its intended impact and is generally supported by landowners and the broader community. Rushing to a decision on the OPA poses the risk of future OPA applications by landowners that challenge the new height limits, delay the approval of future housing projects, and unnecessarily consume staff resources. Specifically, the study should:

- Consider whether the proposed height limits will result in densities that have a meaningful impact on the feasibility of redevelopment where intensification is most desired.
- Consider increasing the maximum height where the tallest buildings are appropriate Downtown (yes, including the Plant No. 2 site), recognizing that the difference between a 20-storey building and one at 25 storeys, for example, will be significant terms of Downtown residential growth but negligible in terms of their physical impact.
- Reinforce the rationale for the height limits ultimately recommended to discourage future OPA applications.

- Clarify how a future Community Planning Permit (CPP) Bylaw will regulate height. We understand that height limits greater than those proposed in the OPA may be permitted through a CPP Bylaw. If this is the intention, then the final Heights OPA should include a policy stating as much to ensure the Bylaw conforms to the Secondary Plan.

## Plant No. 2 Development Concept

Urban Strategies is part of a team of consultants that has been working with the Wood Development Group over the past two years to understand the challenges of redeveloping the site and prepare a development concept that is economically feasible, supports the goals for Downtown, and would have a positive impact on the Ward community.

The site's challenges include the need for soil remediation, extensive demolition, re-alignment of major trunk services, setbacks from the Guelph Junction Railway corridor, and retention and reuse of a historic factory building. To address these challenges and account for a range of public realm opportunities, including a new park, other public open spaces, and connections through the site for pedestrians and cyclists, Wood Development Group determined a minimum density of development would be required. To achieve the required density, the planning and design team prepared a concept that concentrates density in buildings of 16 and 24 storeys in the heart of the site while conserving the entire historic factory building. Other midrise buildings north and south of the rail corridor have stepped heights to provide appropriate transitions to the surrounding neighbourhood. A diverse, interconnected public realm will knit the development into the Ward and the larger city.

In November 2024, we presented the proposed concept at a community open house. The response at the event and through a survey that followed has been largely positive. Residents understood the rationale for the building heights (though not all agreed of course), many appreciated the open spaces and connections that will open up the site, and are looking forward to the project moving forward.



Illustrations of the Plant No. 2 Development Concept. For more information go to [www.wooddevelopment.ca/Plant2](http://www.wooddevelopment.ca/Plant2).

The next step is preparation of an Urban Design Master Plan, which will involve further consultation with the community and City staff, and the submission of planning applications later this year.

### **Comments on the Proposed Official Plan Amendment**

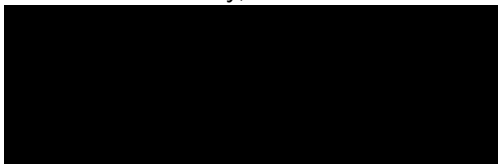
Based on the extensive study undertaken for the Plant No. 2 site and the resulting development concept, we respectfully request the following refinements be made to the Heights OPA before it is finalized and adopted:

1. Modify the proposed Schedule D as shown in the image attached to this letter to better align with the massing in our development concept. The proposed changes include:
  - Slightly expanding the area for tall buildings in the heart of the site, permitting up to 24 storeys; and
  - Extending the area for 4-12 storey buildings adjacent to Duke Street along the south edge of the site, replacing the area for 4-16 storey buildings.
2. Add a policy to clarify that the minimum heights identified on Schedule D apply to whole buildings and not every part of a building. Minimum heights should not apply to building podiums, for example, or townhouses that might line the podium of taller buildings.
3. Eliminate the maximum densities in the Downtown Secondary Plan, which only apply to the Metalworks site (former Wood Plant No. 1) and Plant No. 2 and are counter to the intensification goals for Downtown. Density controls can result in undesirable urban design outcomes, and in the case of Plant No. 2, where the maximum density is currently 1.2 FSI, the proposed maximum heights in the Draft OPA would not be close to being achievable. Height limits and other urban design policies are effective tools for regulating density.

As noted in the general comments above, we also suggest the final OPA include a policy that would allow a future CPP Bylaw to permit greater heights than those in Schedule D subject to conditions set out in the Bylaw.

Thank you for considering our comments and requested OPA refinements. We look forward to discussing them at your convenience.

Yours sincerely,















Tim Smith, RPP, MCIP  
Principal

Attachment: Proposed Modifications to Draft OPA - Schedule D



Legend

	2-4 Storey		4-12 Storey		Proposed View Corridors		Boundary of the Secondary Plan Area
	3-6 Storey		4-16 Storey		Special Policy Area	*	See Policy 11.1.7.11.10
	4-8 Storey		4-18 Storey		Proposed and existing Parks and Open Space	**	Subject to Urban Design Master Plan
	4-10 Storey		4-24 Storey				