

April 3, 2025

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

Attention: Stacey Laughlin, Downtown Revitalization Advisor

**Re: Downtown Heights Study and Official Plan Amendment  
Public Meeting, April 8, 2025 (Item 6.1)**

---

Urban Strategies Inc. is pleased to provide the following comments on the Downtown Heights Study and Proposed 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. Following community engagement on a proposed development concept in the fall of last year, we are currently preparing an Urban Design Master Plan for the site.

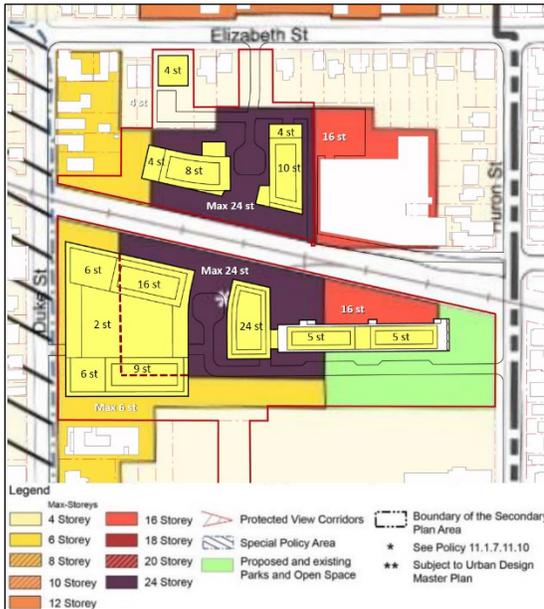
As a general comment, we commend the project team for its consultative approach to the Downtown Heights Study and strongly support the height limits they are recommending in Schedule D of the revised OPA. They have recognized that tall buildings in areas away from the historic heart of Downtown, specifically south of the tracks and on large sites like the former Wood Plant No. 2 site, can accommodate tall buildings that will boost the Downtown population while respecting its heritage and sense of place. The greater flexibility with respect to heights will help unlock sites challenging to redevelop.

Although we generally support the revised OPA, there are two items of concern we respectfully request be reconsidered before it is adopted:

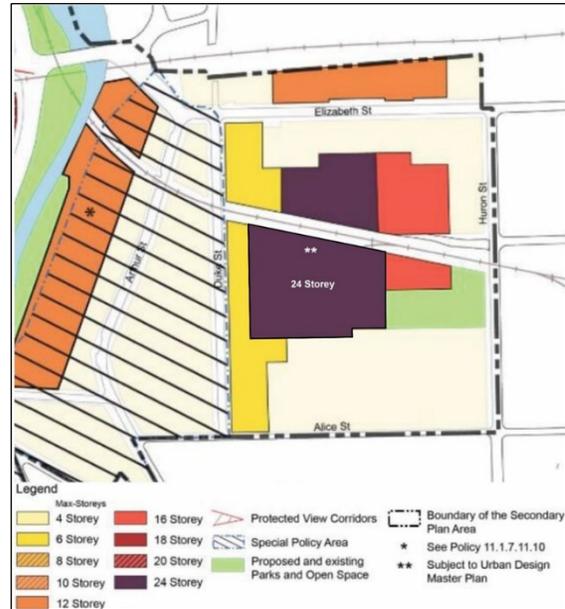
1. The delineation of maximum height zones on the Wood Plant No. 2 site—permitting up to 24 storeys in the heart of the site and up to 6 storeys along Duke Street and the site's south edge—supports the massing in our current concept in most respects. However, the delineation of the area south of the Guelph Junction Railway corridor for the tallest buildings does not fully capture a building currently proposed at 16 storeys and another at 9 storeys, as illustrated below. **We propose two potential refinements to the OPA, either of which would address our concern:**

#### **Recommended Schedule D Modification – Option 1**

As illustrated below, a slight expansion of the zone for up to 24 storeys on the south side of the Plant No. 2 site would allow for three residential buildings greater than 6 storeys to be accommodated south of the rail corridor with appropriate spacing.



Wood Plant No. 2 conceptual buildings overlaid on revised Schedule D



Proposed modification to Schedule D

**Recommended Additional Policy – Option 2**

Alternatively, we propose the following policy be added to the OPA following Policy 11.1.8.4.1 to allow for minor adjustments to the delineation of height zones in Schedule D based on Urban Design Master Plans:

*Further to Policy 11.1.8.4.1, and notwithstanding Policy 11.1.7.2.1, in addressing the location and massing of new buildings, Urban Design Master Plans and zoning by-law amendments aligned with them may set height limits that reflect minor adjustments to the boundaries between areas with different maximum heights in Schedule D, provided the proposed massing of buildings resulting from such adjustments meets the principles, objectives and general intent of this Secondary Plan and maintains the protected public view corridors to the Church of Our Lady.*

Adopting the above policy would recognize that one of the purposes of an Urban Design Master Plan is to determine the appropriate massing of future buildings on large, complex sites. It would allow for massing concepts that reflect an optimal and sensitive approach to intensification but which stray in a minor way from the height zone boundaries in Schedule D (while respecting the height limits in each zone). The advantage of this policy over the option of modifying Schedule D for the Wood Plant No. 2 site is that it would apply to other sites that will be subject to Urban Design Master Plans, namely the Quebec Street Mall property and adjoining lands.

2. Policy 11.1.7.2.4(c) has been revised and now states, “Mechanical penthouses and elevator cores shall be screened and integrated into the design of buildings *and shall not exceed the maximum building height as identified on Schedule D, with the exception of the elevator core only*” (change italicized). This policy goes against the City’s long-standing practice, and that of most municipalities, to not include mechanical penthouses when measuring height. It is not consistent with the City’s Zoning By-law, which exempts “rooftop mechanicals” from height restrictions (Provision 4.14.1(g)), and therefore will likely cause confusion.

**We recommend Policy 11.1.7.2.4(c) be revised to its original wording before the OPA is approved.**

If the City is concerned about the impacts of mechanical penthouses, we suggest they be addressed in the updated Built Form Standards for Downtown or through the planned Community Planning Permit System. Their impacts can be mitigated through minimum setbacks, as the Zoning By-law currently requires, and the maximum area they occupy on a roof can also be regulated.

Thank you for considering our proposed refinements to the Downtown Heights OPA, which we would be happy to discuss at your convenience. We appreciate the opportunities we have had to provide input to the Heights Study and look forward to working with City staff again as they take the next big step in promoting intensification and revitalization Downtown—the development of a Community Planning Permit System.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Smith', written in a cursive style.

Tim Smith, RPP, MCIP  
Principal



## Plant No. 2

Council Planning Meeting  
Proposed Official Plan Amendment: Downtown Building Heights  
April 8, 2025



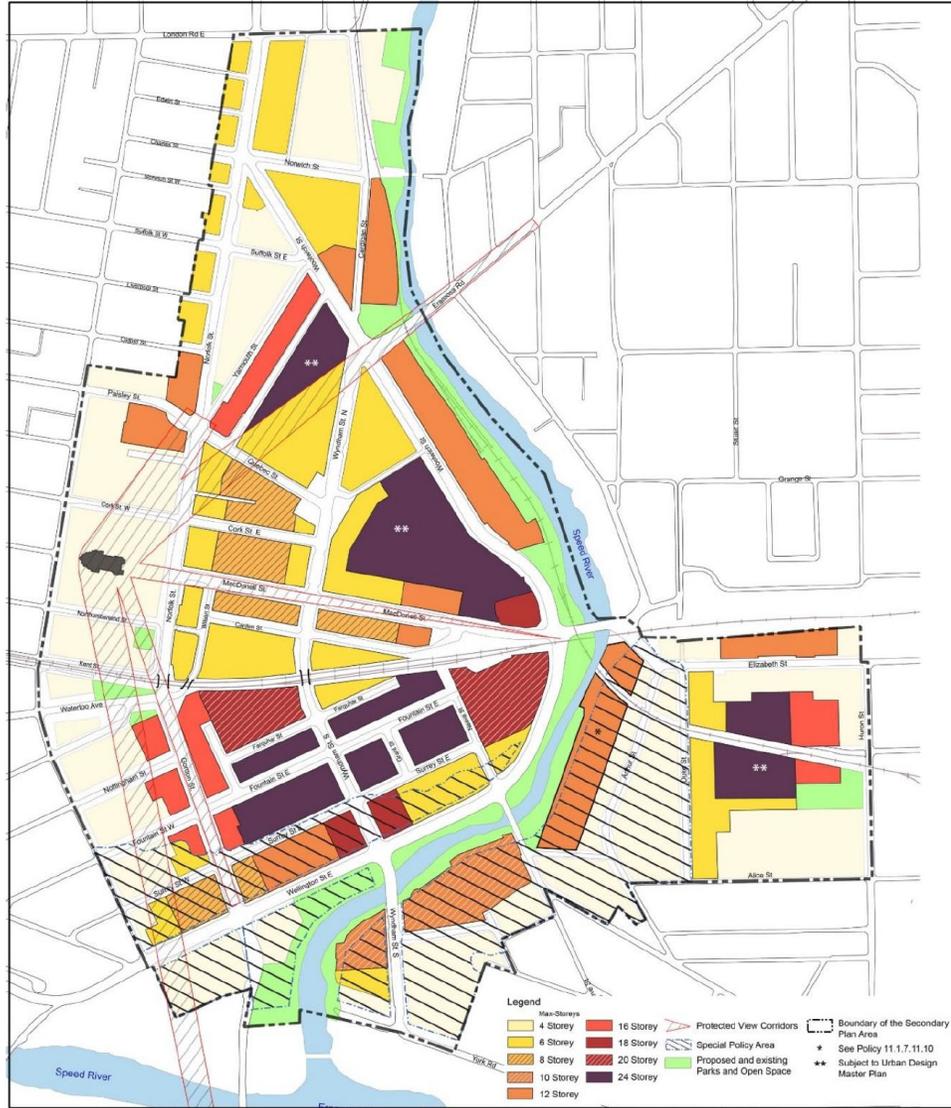
WOOD DEVELOPMENT GROUP  
*Creating Space for Life*

**URBAN  
STRATEGIES  
INC .**

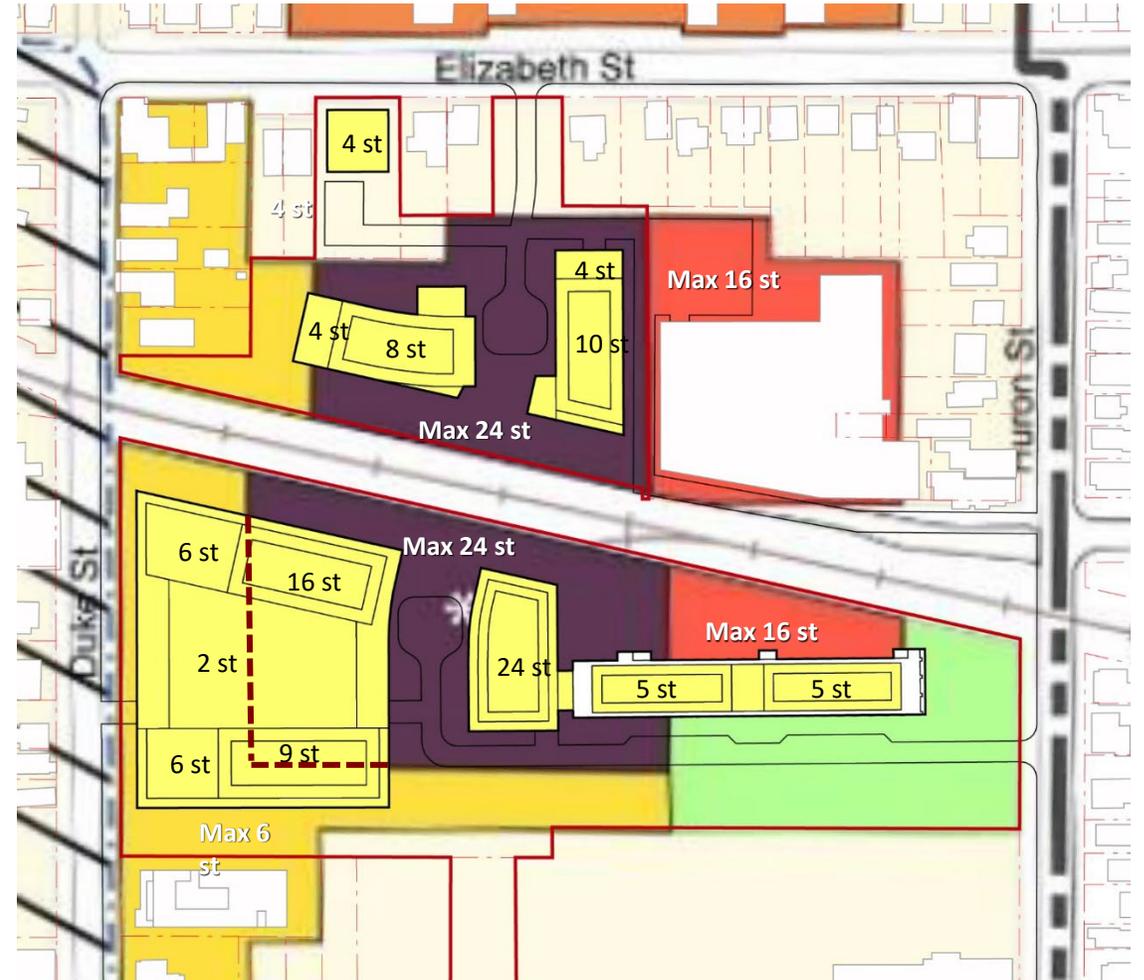
# Plant No. 2 Proposed Development Concept



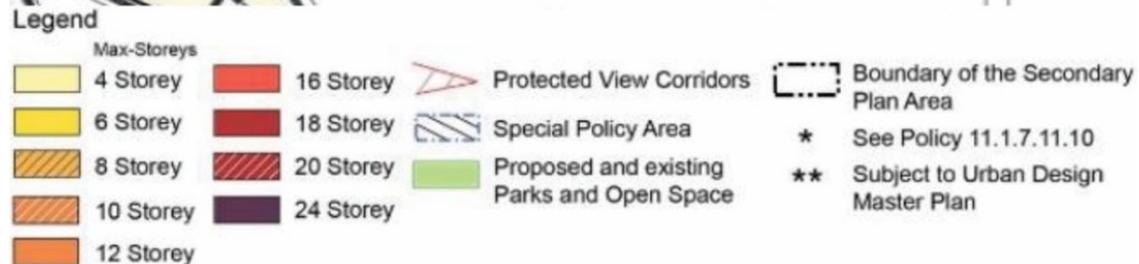
# Proposed Schedule D Downtown Secondary Plan Maximum Building Heights



# Plant No 2 Concept overlay on proposed Schedule D



# Proposed Schedule D: Downtown Secondary Plan Maximum Building Heights



# Proposed Refinements



## **Recommended new policy to follow 11.1.8.4.1**

*Further to Policy 11.1.8.4.1, and notwithstanding Policy 11.1.7.2.1, in addressing the location and massing of new buildings, Urban Design Master Plans and zoning by-law amendments aligned with them may set height limits that reflect minor adjustments to the boundaries between areas with different maximum heights in Schedule D, provided the proposed massing of buildings resulting from such adjustments meets the principles, objectives and general intent of this Secondary Plan and maintains the protected public view corridors to the Church of Our Lady.*

## Recommended policy amendment related to mechanical penthouses

*Mechanical penthouses and elevator cores shall be screened and integrated into the design of buildings ~~and shall not exceed the maximum building height as identified on Schedule D, with the exception of the elevator core only.~~*