

March 31, 2025

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Submitted via e-mail.

**Re: City of Guelph – Downtown Height Study
Comments on Draft Official Plan Amendment No. 106
26-40 Carden Street & 27-39 MacDonell Street, Guelph
Skyline Retail Real Estate Holdings Limited**

On behalf of our client, Skyline Retail Real Estate Holdings Limited, please accept this Letter with respect to the City of Guelph's Downtown Height Study. Since the release of the first draft Official Plan Amendment on January 21, 2025, as well as the Special Council Meeting on February 11, 2025, we note that the City released a revised Official Plan Amendment No. 106 (OPA 106) on March 18, 2025. As per the Notice of Public Meeting provided by City Staff, it is understood that OPA 106 will be brought to Council on April 8, 2025, for a decision.

This Letter provides updated comments and recommendations on the revised OPA 106, specific to the lands identified as 26-40 Carden Street and 27-39 MacDonell Street, owned by our client. We also note that a previous correspondence, dated February 3, 2025, was provided to City Staff and included on the February 11, 2025, agenda for Council's consideration. We maintain our comments and position from the previous correspondence to permit a maximum height of 16 storeys, which can be found enclosed to this Letter as "Appendix A".

1. Comments on Official Plan Amendment 106

The First Draft Schedule 'D', shown below in Figure 1, was released in January 2025 and contemplated a minimum and maximum building height of 3-6 storeys for the subject property. As per the revised Draft Schedule 'D', shown below in Figure 2, it is understood that City Staff are now recommending the maximum building height be increased to 8-storeys.

While we certainly appreciate that City Staff have increased the proposed height by an additional 2-storeys for the subject property and surrounding lands to the east, west and north in response to our previous correspondence, we still maintain our position that a maximum height of 16 storeys is appropriate for the subject property.



Figure 1: First Draft Schedule 'D' (January 2025)

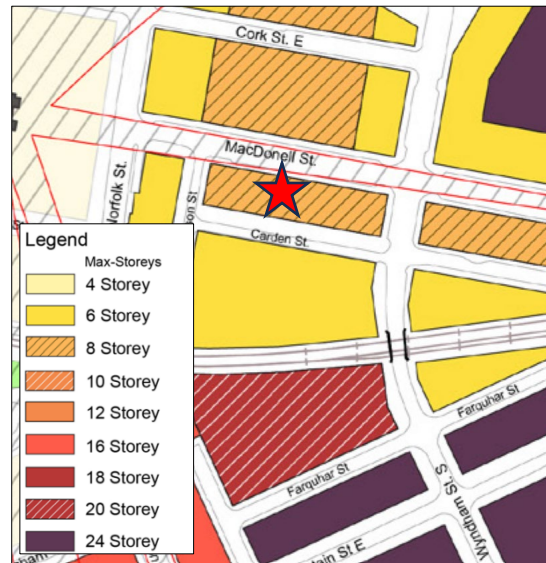


Figure 2: Revised Draft Schedule 'D' (March 2025)

As previously noted, the Planning Justification Report, Urban Design Brief and supporting studies/plans provided as part of the 14-storey OPA/ZBA application (OZS24-012) on the subject property support the additional height and density. In our opinion, the recommended maximum height of 16 storeys for OPA 106 is appropriate in this context for a number of reasons as discussed ad-nauseum in our Planning Justification and Urban Design Reports.

A number of design elements can be implemented in order to minimize impacts on the public realm and to integrate taller buildings while being sympathetic to the existing character of the downtown, which are listed as follows:

- 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

Further, as shown in our PowerPoint presentation to City Council during the February 11th meeting, the 3D rendering of the proposed 14-storey mixed-use development that was submitted as part of the now paused OPA/ZBA Application shows no visual impacts to the Protected View Corridor along MacDonnell St (Figure 3). It is our opinion that an additional 2-storeys for a maximum permitted height of 16-storeys would still achieve the same outcome and have no visual impacts to the Protected View Corridor along MacDonnell St



Figure 3: 3D Rendering of 14-Storey development from OPA/ZBA application OZS24-012 facing west along MacDonell Street (Source: SRM Architects & Urban Designers)

2. Conclusion

As described in this Letter and our previous correspondence from February 3, 2025, we maintain that our position that the designation permitting a maximum of 16 Storeys be applied to the subject property and the surrounding area. 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 OPA 106 to City Council for a decision on April 8. Should you have any questions or to discuss, please do not hesitate to contact the undersigning.

Sincerely,



David Galbraith MCIP RPP

President, UP Consulting



Christian Tsimenidis BES

Senior Planner, UP Consulting

February 3, 2025

APPENDIX A

Ms. Brenna Mackinnon,
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Ms. Stacey Laughlin,
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**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.

3. 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.

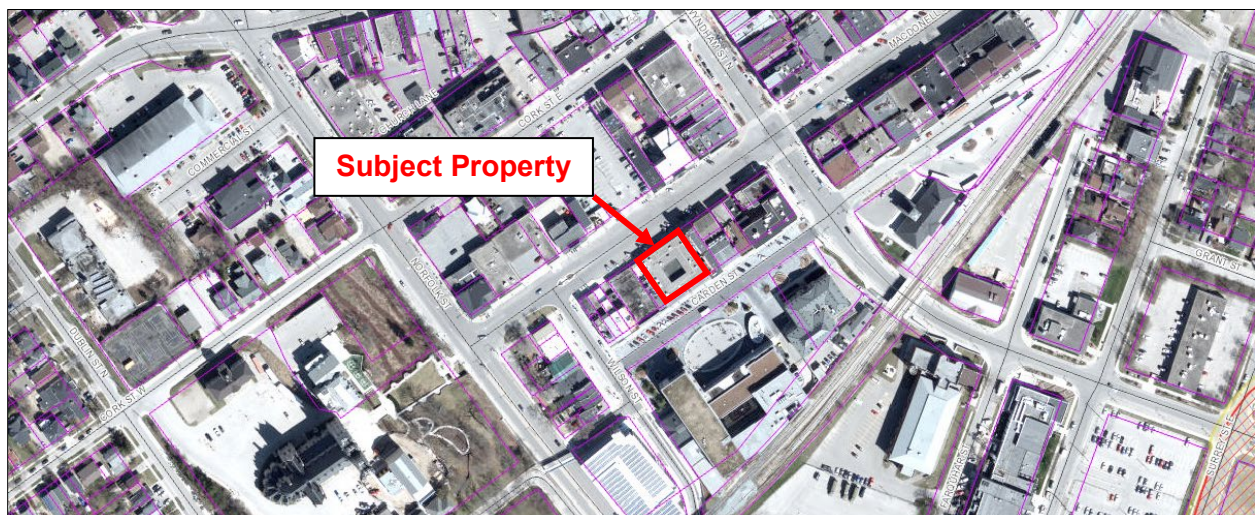


Figure 1: Location of Subject Property and Neighbourhood Context (Source: GRCA GIS Portal)

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)

4. 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.

5. 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 MacDonnell 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 MacDonnell St, and not on the South side, being our client's lands. Both lots have frontage along MacDonnell 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.

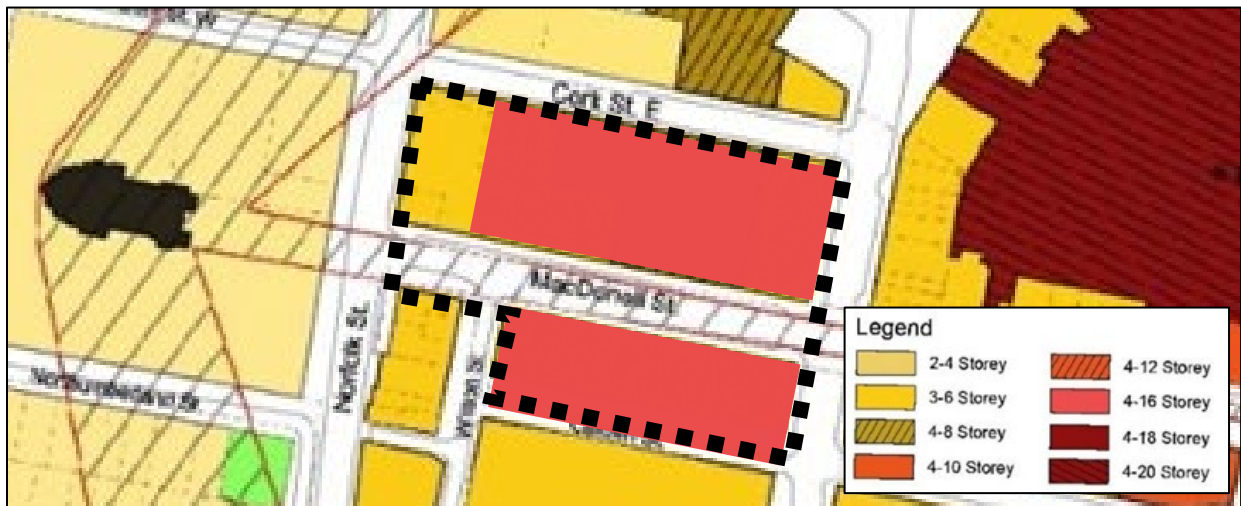


Figure 7: Recommended Heights for Carden - Norfolk – Cork – Wyndham Block

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

6. 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,



Christian Tsimenidis, BES
Senior Planner



David Galbraith, MCIP RPP
President

March 31, 2025

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Submitted via e-mail.

**Re: City of Guelph – Downtown Height Study
Comments on Draft Official Plan Amendment No. 106
36-50 Wellington Street East, Guelph
Vive Development Corporation**

On behalf of our client, Vive Development Corporation, please accept this Letter with respect to the City of Guelph's Downtown Height Study. Since the release of the first draft Official Plan Amendment on January 21, 2025, as well as the Special Council Meeting on February 11, 2025, we note that the City released a revised Official Plan Amendment No. 106 (OPA 106) on March 18, 2025. As per the Notice of Public Meeting provided by City Staff, it is understood that OPA 106 will be brought to Council on April 8, 2025, for a decision.

This Letter provides updated comments and recommendations on the revised OPA 106, specific to the lands identified as 36-50 Wellington Street E, owned by our client. We also note that a previous correspondence, dated February 6, 2025, was provided to City Staff and included on the February 11, 2025, agenda for Council's consideration. We maintain our comments and position from the previous correspondence to permit a maximum height of 35 storeys, which can be found enclosed to this Letter as "Appendix A".

1. Comments on Official Plan Amendment 106

The First Draft Schedule 'D', shown below in Figure 1, was released in January 2025 and contemplated a minimum and maximum building height of 4-16 storeys for the subject property. As per the revised Draft Schedule 'D', shown below in Figure 2, City Staff are now recommending the maximum building height be decreased to 12-storeys. The 12-storeys reflects the current permitted height on Schedule 'D'. It is our understanding that City Staff did not intend to increase the maximum building height to 16-storeys in the first draft, as this was an administrative error, and that lands with the Special Policy Area are not being considered/updated at this time.



Figure 1: First Draft Schedule 'D' (January 2025)



Figure 2: Revised Draft Schedule 'D' (March 2025)

As noted by City Staff during the February 11th Special Council Meeting, and confirmed by Brenna MacKinnon (Project Manager, Policy Planning) on March 10, 2025, our client's lands are subject to the Special Policy Area, whereby City Staff are not considering additional heights at this time. It is understood that once the Grand River Conservation Authority (GRCA) has updated the floodplain mapping through modelling, heights within the Special Policy Area will be reviewed and updated where appropriate at a later date.

We respectfully disagree with the City's position that additional building heights within the Special Policy Area should not be considered at this time. It is our opinion that the subject property and surrounding lands should permit a maximum building height of 35-storeys, as detailed in our previous correspondence enclosed to this Letter, and any further review of height permissions should be undertaken as part of this current planning initiative rather than deferred to a later date.

While we acknowledge the importance of the GRCA's floodplain mapping update, we do not believe that the consideration of building height permissions within the Special Policy Area should be contingent on the completion of that study. The existing policy framework supports intensification in this area, and delaying height reviews until the GRCA's modelling is finalized (potentially not until late 2025 or early 2026) unnecessarily stalls development opportunities and contradicts broader planning objectives for greater height and density in the downtown core.

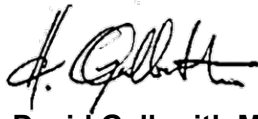
We maintain that a comprehensive and strategic approach to planning should allow for the concurrent review of building heights as part of this OPA process. The subject lands and surrounding properties warrant consideration of their development potential, in alignment with good planning principles and the City's broader growth objectives. Further consideration of the GRCA's updated floodplain mapping could be dealt with during the implementing Zoning By-law Amendment stage following the adoption and approval of the OPA. We respectfully request that the City reconsider its position and include the review of height permissions within this initiative.

2. Conclusion

As described in this Letter and our previous correspondence from February 6, 2025, we maintain that our position that the designation permitting a maximum of 35 Storeys be applied to the subject property and the surrounding area. It is our opinion that the proposed request is appropriate and represents good planning. Further, we respectfully request that the City reconsider its position and include the review of height permissions within this initiative, rather than deferring to a later date once the GRCA floodplain mapping has been completed in late 2025 or early 2026.

We trust that the information provided in this Letter will be considered as you advance OPA 106 to City Council for a decision on April 8. Should you have any questions or to discuss, please do not hesitate to contact the undersigning.

Sincerely,



David Galbraith MCIP RPP

President, UP Consulting



Christian Tsimenidis BES

Senior Planner, UP Consulting

February 6, 2025

APPENDIX A

Ms. Brenna Mackinnon,
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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.

3. 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.

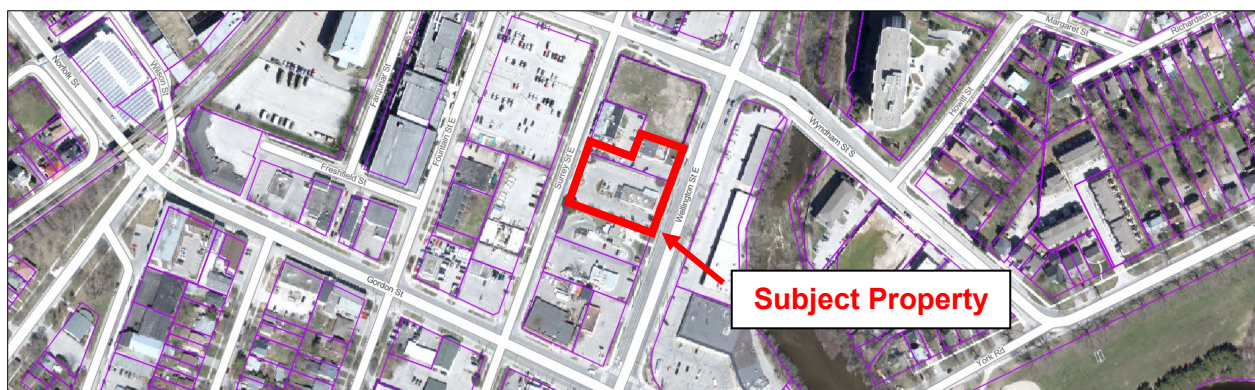


Figure 1: Location of Subject Property and Neighbourhood Context (Source: GRCA GIS Portal)

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)

4. 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.

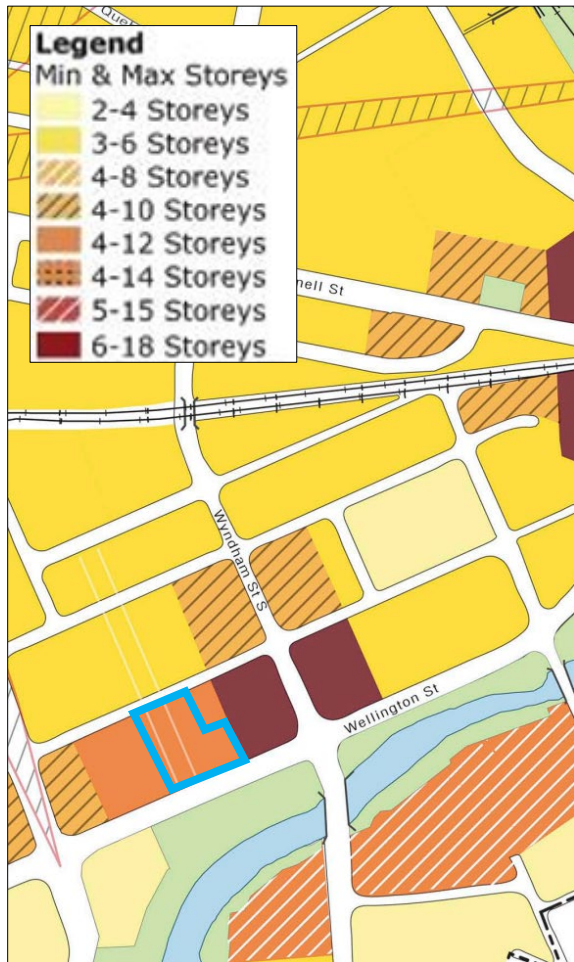


Figure 4: Current Schedule 'D'



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.

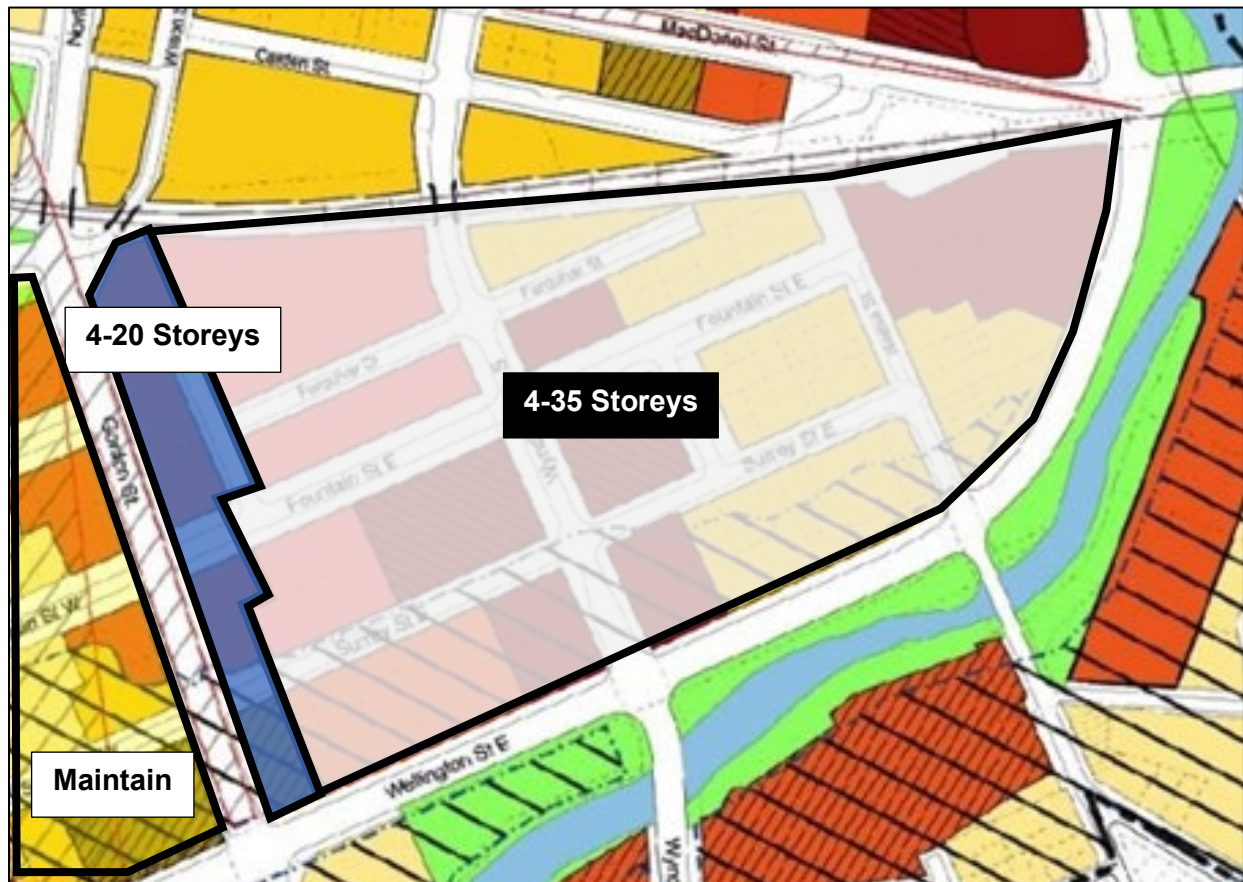


Figure 6: Recommended Heights for Downtown (Eastern Area)

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.

5. 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.)

6. 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 with 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.

7. 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,



Christian Tsimenidis, BES
Senior Planner



David Galbraith, MCIP RPP
President

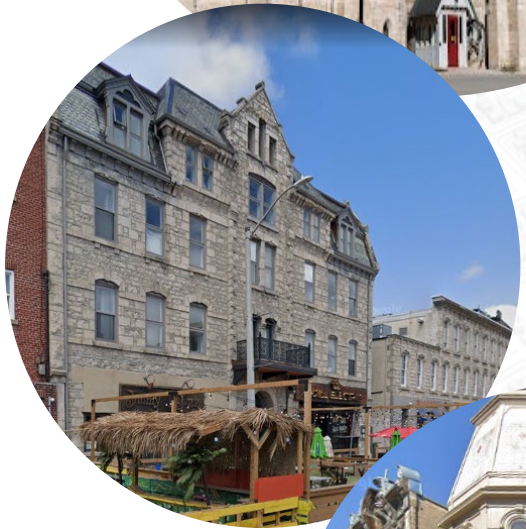


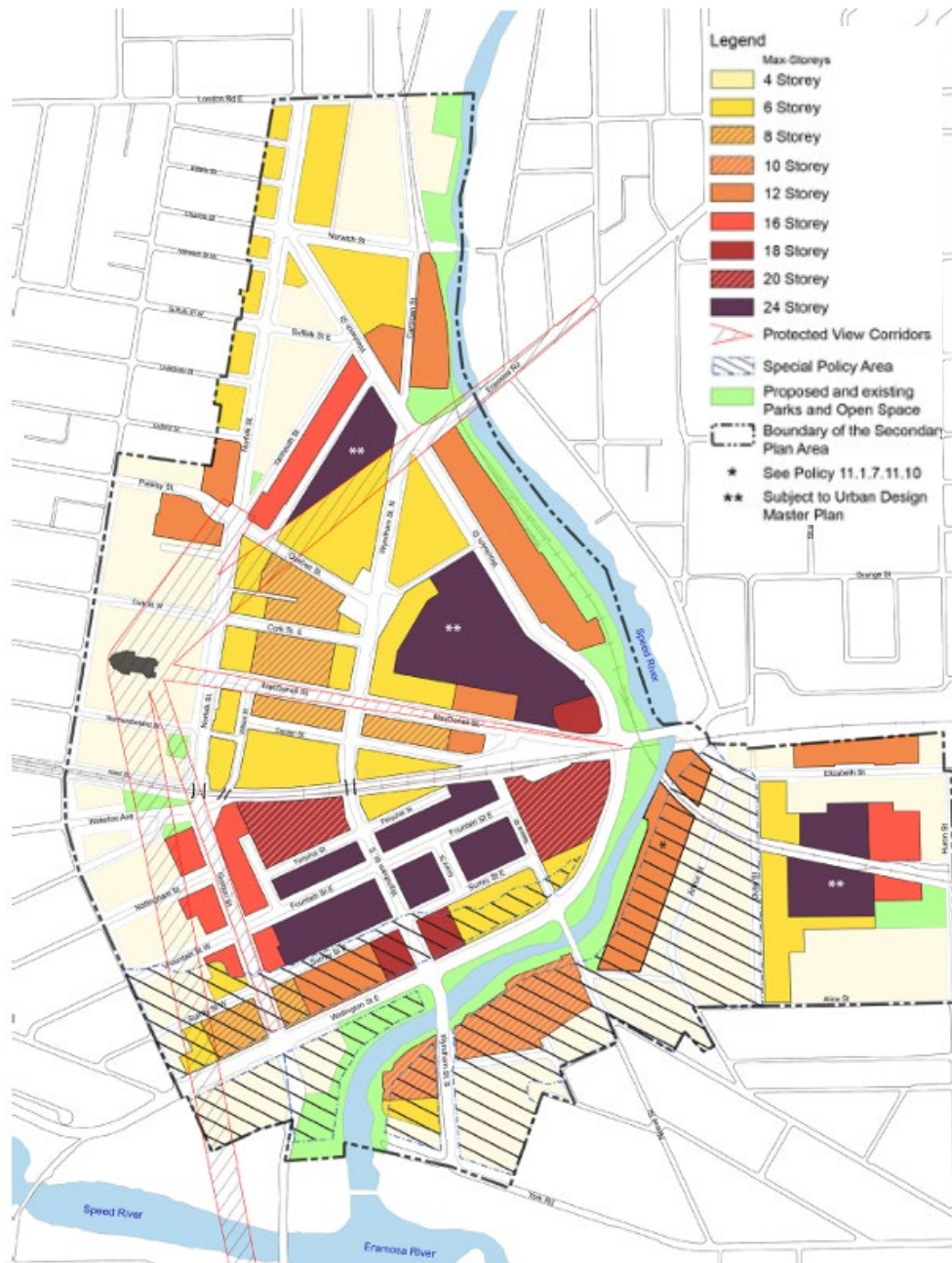
GUELPH HEIGHT STUDY



City of Guelph Council Meeting
April 8, 2025

A TALE OF TWO DOWNTOWNS





REVISED HEIGHT SCHEDULE

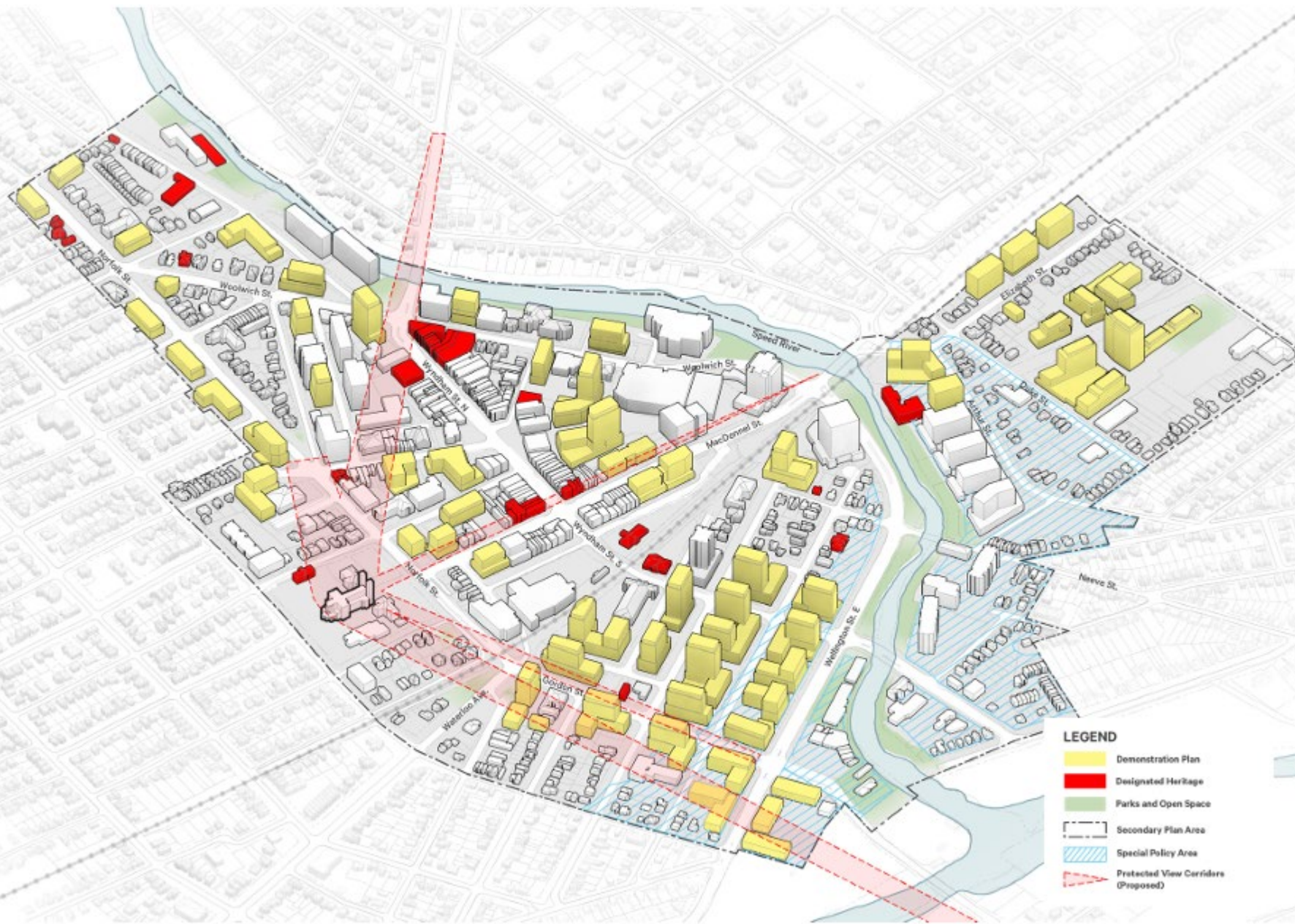
Several changes proposed from initial draft presented to Council in February 2025; many positive

Some additional height contemplated south of rail line, minimal changes to core area (abandonment of 'amphitheatre' concept)

No changes to heights within SPA contemplated

Up Consulting Ltd. submitted additional correspondence with regards to the following sites:

- 26 Carden (Skyline) – recommending 4-16 storeys, whereas 8 storey max proposed by draft OPA
- 36-50 Wellington (Vive) – recommending 35 storeys whereas 12 storey max maintained by draft OPA (located within SPA)



SVN Report includes a demonstration plan based on heights recommended by draft OPA

Current downtown density is 105 PPJ/hectare

Plan shows visualizes a density of (approx.) 220 PPJ, only slightly exceeding provincial targets (200)

SVN Report notes that “not all properties will develop to the maximum extent identified in the 3D model, as **real-world** development depends on market conditions.”

REAL WORLD DEVELOPMENT ALSO DEPENDS ON

WILLINGNESS OF LANDOWNERS
TO SELL

IN/ABILITY TO PROVIDE PARKING

INTEREST RATES

SECURING DEVELOPMENT
FINANCING

HERITAGE ATTRIBUTES AND
ARCHAEOLOGY

MANAGING COMPATIBILITY
ISSUES

GROUNDWATER CONDITIONS

PRE-SALES FOR CONDOMINIUMS

GROWTH AND IMMIGRATION
RATES

MUNICIPAL AND GROWTH
RELATED FEES

MATERIALS SOURCING AND
AVAILABILITY

GRADING CONSTRAINTS

NOISE AND VIBRATION
MITIGATION

ENVIRONMENTAL CLEANUP + COSTS

SOIL AND GEOTECHNICAL
CONDITIONS

PERMITTING AND
ENTITLEMENTS

DEMAND

HISTORIC EASEMENTS AND
DEVELOPMENT AGREEMENTS

ADEQUACY OF SERVICES

LOT CONSOLIDATION

GEOPOLITICAL
UNCERTAINTIES

LABOUR COSTS AND
AVAILABILITY

AVAILABILITY AND COSTS OF
SKILLED TRADES

RENTAL MARKET CONDITIONS

PROPERTY FABRIC

LAND COSTS

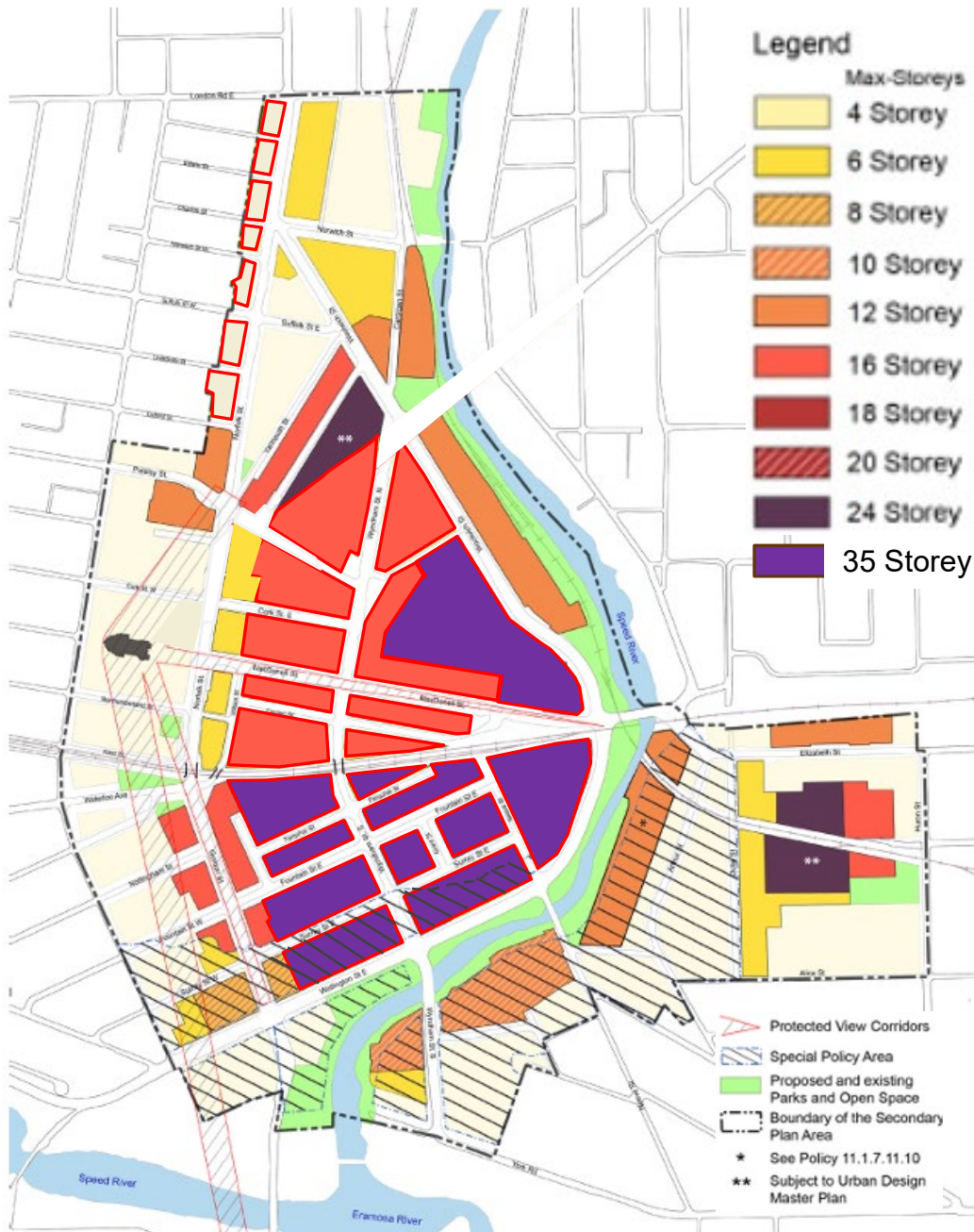
**ESTABLISHING A PERMISSIVE PLANNING
FRAMEWORK IS ONLY A
STARTING POINT**

PROPOSED MODIFICATIONS

We propose the following modifications to the proposed OPA:

- A. Increasing maximum heights in certain areas to 35 storeys, mostly applying to lands south of the rail line
- B. Increasing maximum heights to 16 storeys in much of the core area of the Downtown; and,
- C. Reducing permitted heights to four storeys along the west side of Norfolk Street

Also recommend the removal of the Eramosa Road protected view corridor which is already largely obstructed

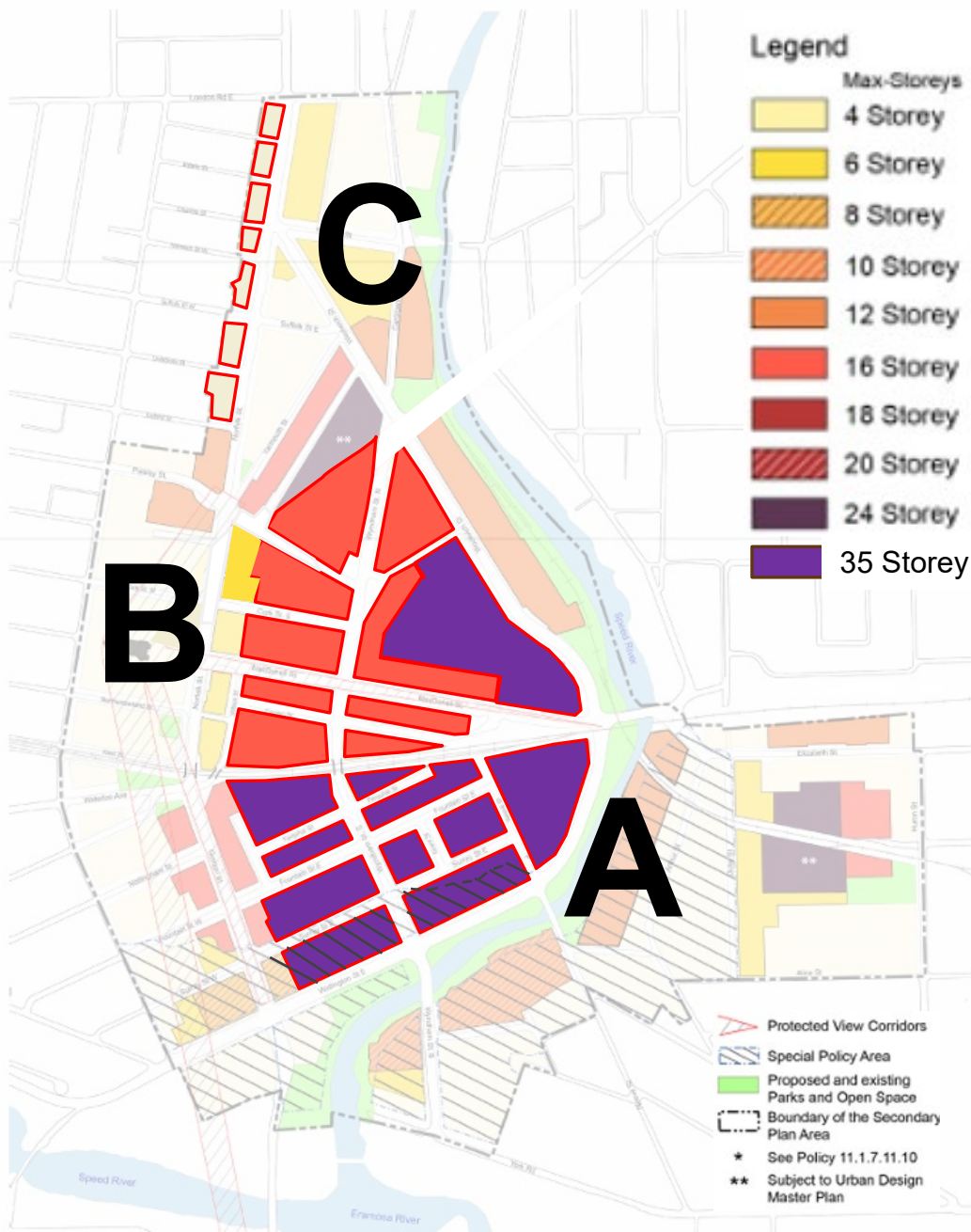


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POTENTIAL BUILD-OUT SCENARIO

A

B

C





POTENTIAL BUILD-OUT
SCENARIO

A

B

C

THANK YOU

Figure 2: Proposed Schedule D: Downtown Secondary Plan
Maximum Building Heights (Alternate Proposal)

