



PLANNING  
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ARCHITECTURE

February 14, 2025

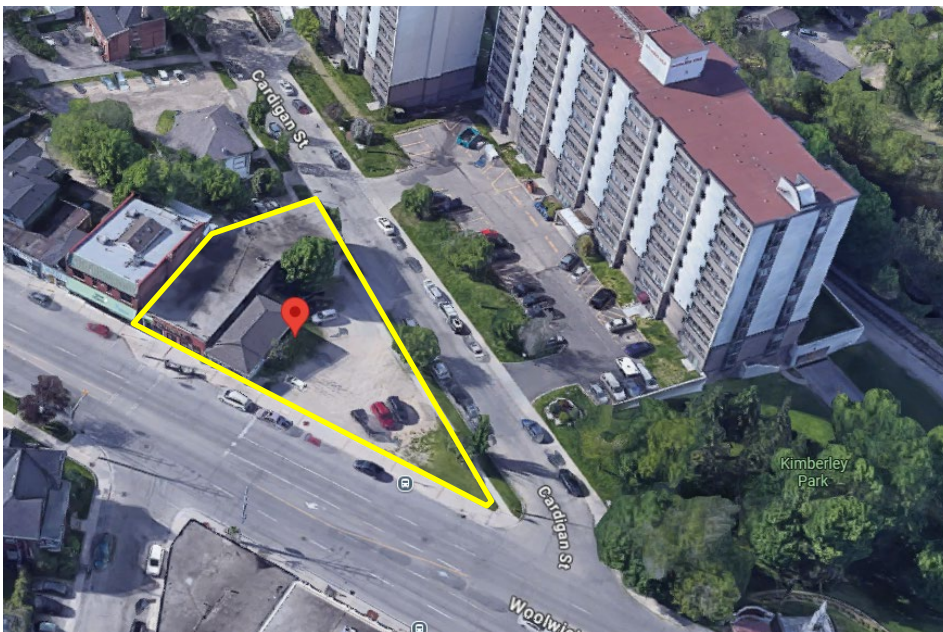
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Dear Ms. Mackinnon and Ms. Laughlin:

**RE: City of Guelph Downtown Height Study / 159-169 Woolwich Street, Guelph / 1210831 Ontario Inc. / OUR FILE 2254A**

I am writing on behalf of my client, 1210831 Ontario Inc., owner of 159-169 Woolwich Street (referred to herein as the "subject lands") in response to the draft Official Plan Amendment related to the Downtown Height Study. The subject lands are located at the northwest intersection of Woolwich Street and Cardigan Street and are currently developed with single-storey commercial buildings and associated surface parking (see Figure 1.0).



**Figure 1.0**  
The Subject Lands  
159-169 Woolwich Street

The subject lands are located in proximity to existing higher density development located along Cardigan Street and are across from Trafalgar Square/Kimberly Park. The subject lands are currently underutilized and represent an opportunity for future redevelopment.

### **Existing Designation and Height Permissions**

The subject lands are currently designated "Mixed Use 1" on the Downtown Secondary Plan Land Use Schedule (Schedule C). According to Schedule D (Maximum & Minimum Building Heights) the subject lands have a maximum height permission of 4 storeys.

### **Proposed Height Permissions**

We have reviewed the draft Official Plan Amendment as it relates to the subject lands. According to the proposed Schedule D the maximum height for the subject lands is proposed to increase from 4 storeys to 8 storeys. **While we are supportive of increased height, it is our opinion that significantly more than 8 storeys is warranted and appropriate for the subject lands.** This opinion considers the following:

- The downtown is a strategic growth area and should be the focus for intensification. Current height permissions do not reflect housing needs and the shift to more compact forms of development that is encouraged in Provincial policy;
- Other nearby municipalities (Kitchener and Waterloo) have allowed heights in excess of 20 storeys in their downtowns for more than 20 years (prior to the Region of Waterloo adopting rapid transit);
- The subject lands are located at an important intersection within the downtown;
- An existing transit stop is located directly adjacent to the subject lands;
- The subject lands are located directly across from two existing 11-storey buildings (these buildings were constructed over 40 years ago, current permissions should be more progressive than what was built 40 years ago);
- Properties on the opposite side of Woolwich Street are proposed at a height of 4-16 storeys leaving the subject lands at a height that is significantly less than existing and planned building heights to the east and west;
- All immediate abutting properties are developed with commercial uses, and as such there would be no impact to low-rise residential properties as a result of increased height;
- The subject lands do not contain any listed or designated heritage buildings;
- The subject lands are located outside of the proposed view corridors to the Basilica; and
- Additional height would provide an opportunity for increased housing supply within the Downtown in a form of development that is compact and transit-supportive.

We respectfully request that a height of 4-20 storeys be applied to the subject lands as contemplated elsewhere in the downtown. This would provide an opportunity for a landmark building at a height that would provide for variation and transition from lands to the east and west.



**Figure 2.0**

Requested revision to draft amendment (from 4-8 storeys to 4-20 storeys).

We appreciate your consideration of these comments and look forward to discussing our request in further detail.

Yours truly,

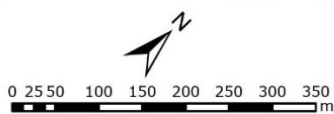
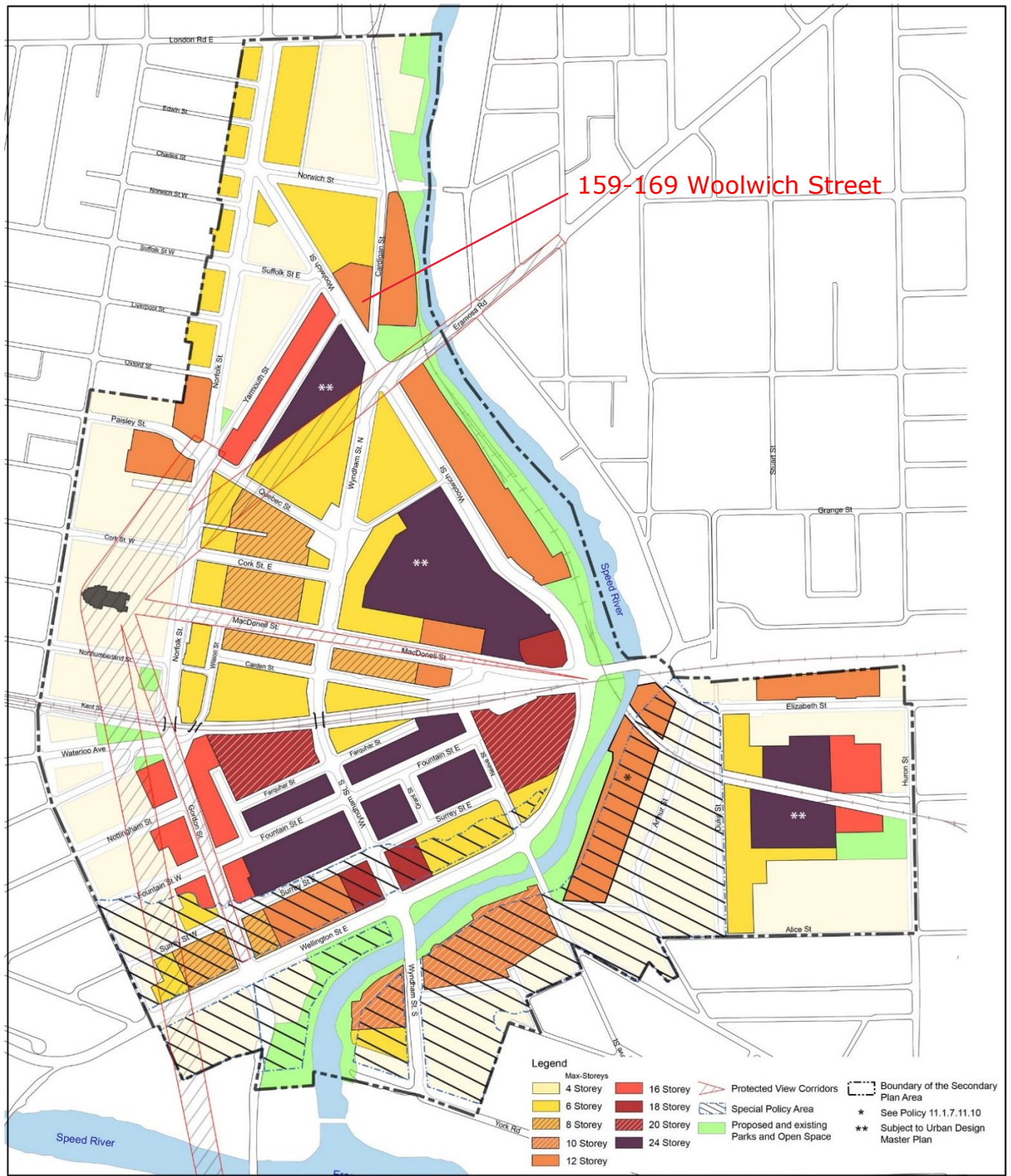
**MHBC**

Andrea Sinclair, MUDS, BES, MCIP, RPP

Cc: 1210831 Ontario Inc.



## Attachment 2 – Schedule D Comparison – Recommended (March 2025)



Produced by the City of Guelph  
Planning and Building Services - Development Planning  
March 2025

**City of Guelph  
Official Plan  
Schedule 'D':  
Downtown Secondary Plan  
Maximum Building Heights**

