

January 16, 2026

Will Gregory, AICP
Project Manager, Policy Planning
Planning and Building Services
Infrastructure, Development and Environment
City of Guelph
will.gregory@guelph.ca

Dear Will,

**Re: Wood Plant No. 2
Draft Community Planning Permit By-law**

We are pleased to submit this letter with our comments on the Draft Community Planning Permit By-law for Downtown.

Preparing a CPP by-law for an area as complex and dynamic as Downtown is an enormous challenge, and we applaud the efforts of the project team to produce a clear and comprehensive draft by-law. Although the by-law has been released as a complete draft, we understand it is staff's intention to address site-specific issues and refine the by-law over the coming weeks based on public and stakeholder comments. We look forward to discussing our comments with staff in the hope of ensuring the CPP By-law achieves its primary objective to encourage residential development, on the Plant 2 site and across Downtown.

Our comments below focus on two main areas of related concerns:

- The precinct designation for the bulk of the Wood Plant No. 2 site and associated land use and built form provisions; and
- The misalignment of height limits between the draft by-law and the Downtown Secondary Plan, and the affordable housing requirement.

Plant 2 Precinct Designation and Provisions

As you are aware, the planning process for the Plant 2 site has been underway for over three years and has involved extensive engagement with the community and City staff. In November 2025, we submitted a draft Urban Design Master Plan (UDMP) for staff review and which we hope will be before Council soon. The UDMP is based on a development concept shared with staff and the community in July 2025. The feedback we have received to date led us to believe there was broad support in principle for the land uses, built form, density and public realm elements reflected in the

concept. As a result, we have not yet submitted OPA and rezoning applications in anticipation of the CPP By-law recognizing the proposed land uses, heights and other built form parameters.

In August last year, in advance of the UDMP and with the intent of informing the CPP By-law, we prepared and submitted the attached letter proposing a precinct designation and provisions for the Plant 2 site. We also requested the City's OPA required to implement the CPPS include an amendment to the Secondary Plan that applies an R2 designation to the entire Plant No. 2 site to acknowledge the high-density forms of housing effectively permitted by OPA 106, which in addition to increasing height limits on the site also removed the density cap.

The draft OPA and CPP By-law have not incorporated our proposed Secondary Plan redesignation, CPP By-law precinct designation (HDR) or by-law provisions and instead essentially maintain the current MDR zoning and associated provisions for the lands. We understand this was intentional, that unique or site-specific items would be addressed following release of the first drafts of the OPA and by-law.

With the intention of guiding discussion toward revisions that align the by-law with the Plant 2 UDMP, we have prepared the table below comparing provisions in the draft by-law with those proposed for the site, with the most significant differences highlighted.

Note, in our August 2025 letter, we had proposed the site be “rezoned” from MDR to HDR with an exception to permit a broader range of non-residential uses than generally permitted in HDR precincts (similar to what was done for the Metalworks site on Arthur Street). Hence, the table below highlights MDR and HDR provisions in the draft by-law. It may be more appropriate, however, to apply a Downtown 2 (D2) precinct designation, which provides more land use flexibility.

	Draft CPP By-law Provisions			Proposed Plant 2 Provisions
	MDR	HDR	Class 2 Staff Variation	
Permitted Uses	Additional dwelling unit Apartment building Community centre Food vehicle Home occupation Legally existing uses, building, and structures Long term care facility Parks and trails Place of worship Retirement residential facility School Supportive housing Townhouse, back-to-back Townhouse, cluster Townhouse, stacked Townhouse, stacked back-to-back		None	Permitted MDR/HDR uses plus: Art gallery Artisan Studio Fitness centre Live-work unit Mixed-use building Occasional use Restaurant Restaurant, take-out Retail establishment Townhouse, on-street Townhouse, rear access on-street (max 500 m² GFA for commercial uses above)

	Draft CPP By-law Provisions			Proposed Plant 2 Provisions
	MDR	HDR	Class 2 Staff Variation	
Discretionary Uses	Medical clinic Public hall Recreational facility Other similar uses			Medical clinic Public hall Recreational facility Other similar uses
Lot frontage (min)	30 m	30 m	25%	30 m
Residential density (min)	35 uph	100 uph	None	100 uph
Residential density (max)	100 uph	150 uph	Up to 250 uph in HDR; none in MDR	none (250 uph may be appropriate)
Setback Regulations:				
Front yard or exterior side yard (min)	6 m		None	Site specific exceptions based on proposed setbacks map
Front yard or exterior side yard (max)	11 m		None	
Interior side yard (min)	3 m (7.5 m where windows of a habitable room face an interior side yard)		None	
Rear yard (min)	7.5 m		20%	
Buffer Strip (min)	A 3 m buffer strip is required adjacent to interior side lot lines and rear lot lines.			No buffer strip requirement
Landscaped open space (min)	40% of lot area <ul style="list-style-type: none"> 50 per cent of landscaped open space shall be covered by soft landscaping in the form of natural vegetation, such as grass, flowers, trees and shrubbery 30 per cent of the required landscaped open space may be in the form of a green roof or blue roof 		5% (30% if the required landscape open space can be provided as a green roof or blue roof)	20% of lot area <ul style="list-style-type: none"> 50% of landscaped open space shall be covered by soft landscaping in the form of natural vegetation, such as grass, flowers, trees and shrubbery. 30% of the required landscaped open space may be in the form of a green roof or blue roof.
Building height (min)	2 storeys	3 storeys	None	3 storeys
Building height (max)	As per Schedule C2		None	As per Schedule C2
Floorplate size (max) 7th/8th st	1,200 m ²		10%	1,200 m ²

	Draft CPP By-law Provisions			Proposed Plant 2 Provisions
	MDR	HDR	Class 2 Staff Variation	
Floorplate size (max) 9th st +	1,000 m ²		10%	1,100 m ²
Building setbacks (min)	3 m for all portions of the building above the 6th storey facing a street for buildings located within 15 m of a street		Where the intent is achieved through an alternative method	3 m for all portions of the building above the 6th storey facing a street for buildings located within 15 m of a street
Building length (max)	75 m for buildings located within 15 m of a street for the portion of the building adjacent to the street		Where the intent is achieved through an alternative method	75 m for the portion of a building above the third storey, adjacent to the street and located within 15 m of a street
Distance between buildings on a lot (min)	One half of the building height to a maximum of 15 m and a minimum of 5 m where there are windows of habitable rooms in either building; 3 m where there are no windows of habitable rooms		Where the intent is achieved through an alternative method	One half of the building height to a maximum of 15 m and a minimum of 5 m where there are windows of habitable rooms in either building; 3 m where there are no windows of habitable rooms
Active entrance	When a building(s) or portion thereof is within 15 m of a street line, a minimum number of 1 active entrance for every 30 m of street line shall be required for the portion of the building facing the street.		Where the intent is achieved through an alternative method	When a building(s) or portion thereof is within 15 m of a street line, a minimum number of 1 active entrance for every 30 m of street line shall be required for the portion of the building facing the street.
Tower separation and setback from side and rear lot lines (min)	25 m; minimum 12.5 setback		Where the intent is achieved through an alternative method	25 m; minimum 12.5 setback
Minimum common amenity area	20 m ² per dwelling unit (2)(3)		10%	5 m ² per dwelling unit

We hope you agree the CPP By-law process should update permissions and regulations for the Plant 2 site since there is clear justification for doing so based on the permissions under OPA 106 and the extensive planning completed for the site. We note the draft by-law appropriately maintains a holding symbol on the site to ensure a UDMP and a servicing study are prepared to the City's satisfaction and to clarify the parkland dedication requirement. In addition, CPP applications will provide an opportunity for a comprehensive technical review of detailed proposals for each phase of development.

If, at a minimum, the site is not zoned as an HDR (or D2) precinct with the requested land use flexibility (and the Secondary Plan amended to enable the rezoning), there is a risk that no development will occur for at least five years, the period in which amendments to the CPP By-law will be prohibited unless Council makes a resolution permitting amendments. And if Council permits amendments, we would still be required to go through lengthy and costly OPA and CPP By-law amendment processes before being in a position to prepare and submit CPP applications. These requirements would be contrary to the intent of the CPPS undertaking for downtown.

Height and Affordable Housing

We are also concerned by the CPP By-law's approach to regulating height, requiring any increase over the pre-OPA 106 height limits to include the provision of a significant proportion of affordable housing units. In the central area of the Plant 2 site, where the proposed development concept concentrates density, the portion of all buildings above 10 storeys and up to 24 storeys would be subject to the affordable housing requirement. The requirement has the potential to be as high as 15% of all units across the site following the transition period ending December 31, 2027. This is well above the Province's limit of 5% for Inclusionary Zoning (now proposed to be on hold in Kitchener, Mississauga and Toronto) and likely would make residential development beyond the outdated height limits unfeasible on most Downtown properties. Although the transition provisions reduce requirements for the near term, they would still be prohibitive, and it is highly unlikely CPP applications for all phases of the Plant 2 redevelopment will be submitted before 2028.

Unfortunately, if the affordable housing requirement is not reconsidered, the UDMP for the Plant No. 2 site may need to be fundamentally revised to ensure the project's viability, putting at risk the extensive public realm initiatives and other community benefits currently proposed.

We look forward to discussing how the CPP By-law can lead to effective streamlining of approvals for more housing Downtown and to collaborating on refinements to the draft by-law that align it with the Plant 2 UDMP, paving the way for transformation of the site with new housing and significant enhancements to The Ward's public realm.

Sincerely,



Tim Smith, RPP, MCIP
Principal

Attachment

c: City Clerk
Ian Panabaker, Wood Development Group

August 8, 2025

Will Gregory, AICP
Project Manager, Policy Planning
Planning and Building Services
Infrastructure, Development and Environment
City of Guelph
will.gregory@guelph.ca

Dear Will,

**Re: Wood Plant No. 2
Proposed Community Planning Permit By-law Provisions**

We are pleased to submit this letter with the intent of assisting the Downtown CPPS team in preparing a first draft of the CPP By-law.

As you know, Wood Development Group and its team of consultants have been advancing plans for the Wood Plant No. 2 site. A third community open house was held on July 23rd, and the team is now preparing an Urban Design Master Plan, expected to be submitted for staff review in the fall. With the goal of aligning the CPP By-law with the emerging UDMP, and recognizing staff's intent to release a draft CPPS By-law as soon as September, below we propose land use and built form provisions for your consideration and which we would be pleased to discuss at your convenience.

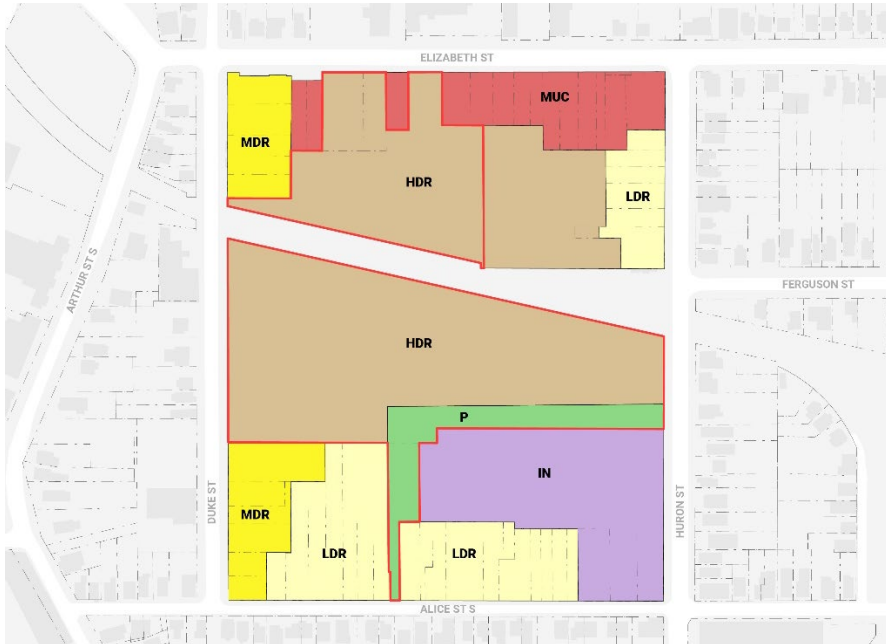
In preparing the UDMP, we do not anticipate making substantial changes to the development concept shared in July and shown here, particularly with respect to proposed land uses and built form. The response from the community has been mostly positive, and comments from City staff following the Pre-Consultation Meeting held July 10th do not suggest major changes to the proposed massing should be considered (we acknowledge there are many comments regarding infrastructure and the public realm to be addressed).



Plant No. 2 Development Concept (July 2025)

Proposed CPPS Precinct

We recommend the entirety of the Plant No. 2 site, except the lands intended to be dedicated for parkland, be “zoned” as a High Density Residential (HDR) precinct, as shown below. This zoning would also be appropriate for the adjacent industrial property at 92 Ferguson Street.



*Proposed CPPS
Precincts*

We acknowledge the City’s desire to see Elizabeth Street become a mixed-use corridor between Duke Street and Huron Street, which is reflected in the MUC zoning shown above. However, we feel it will make the processing of future development applications less complicated if the north parcel of the Plant No. 2 site does not have split zoning. As noted below, we are seeking permission to incorporate small-scale, neighbourhood-oriented commercial uses on the site. You might consider this approach for other properties along Elizabeth Street—applying residential zoning instead of MUC and permitting rather than requiring ground-floor non-residential uses—since commercial uses may be challenging to sustain given the function and nature of Elizabeth.

General High Density Residential Provisions

The following proposed built form and other provisions would facilitate the development concept for the Plant No. 2 site, and we believe they would be appropriate as general standards for other HDR sites in the Downtown. They are informed by current standards in RM, RH and D zones, and provisions adopted for the HDR precincts in the Stone Road / Edinburgh Road area. Some proposed provisions depart from standards in these four zones, notably those pertaining to density, landscaped open space and common amenity area, in response to the context of Downtown and the objective to achieve a more compact form of development in the city’s core than is expected elsewhere. Further explanatory comments are provided in brackets.

	HDR
Minimum Lot Frontage:	30 metres
Minimum Lot Area:	none
Maximum Lot Area:	none
Minimum Residential Density:	150 units/ha (<i>given the new height limits Downtown, this minimum density should be achievable on all HDR sites</i>)
Maximum Residential Density:	none (<i>height limits and other built form provisions are sufficient for controlling density in the Downtown</i>)
Buffer Strip:	none (<i>buffer strips generally are not common in a downtown</i>)
Minimum Landscaped Open Space:	<p>20% of lot area (<i>although the concept for Plant No. 2 includes a significant amount of LOS, a minimum requirement higher than 20% would be unreasonable on more conventional HDR sites in Downtown</i>)</p> <p>50% of landscaped open space shall be covered by soft landscaping in the form of natural vegetation, such as grass, flowers, trees and shrubbery.</p> <p>30% of the required landscaped open space may be in the form of a green roof or blue roof.</p>
Minimum common amenity area:	5 m ² per dwelling unit (<i>this is in line with what is accepted in other high-density downtowns in Ontario</i>)
Minimum Building Height:	3 storeys
Maximum Floorplate Size – 7 th and 8 th storeys:	1,200 m ²
Maximum Floorplate Size – 9 th and above storeys:	1,100 m ² (<i>the slight increase over the current maximum of 1,000 m² would allow for more efficient floorplates, which supports affordability</i>)

Minimum Building Stepback:	3 metres for all portions of the building above the 6th storey facing a street for buildings located within 15 metres of a street
Maximum Building Length:	75 metres for the portion of a building above the third storey, adjacent to the street and located within 15 metres of a street
Minimum Distance between Buildings:	Where two or more buildings are located on a lot, the distance between the wall of one building and the wall of another building either of which contain windows of habitable rooms, shall be one-half of the building height to a maximum of 15 metres and a minimum of 3 metres. The distance between the faces of any two buildings with no windows to habitable rooms shall be a minimum of 3 metres.
Minimum Tower Separation:	25 metres
Minimum Tower Setback from an Interior Side or Rear Lot Line:	12.5 metres
Angular Planes:	<i>none (given the new height limits Downtown, angular planes would be difficult to enforce; built form transitions can be regulated through setback and stepback provisions)</i>
Active Entrance:	When a building(s) or portion thereof is within 15 metres of a street line, a minimum number of 1 active entrance for every 30 metres of street line shall be required for the portion of the building facing the street

Site-Specific Provisions

In light of the unique characteristics of the Plant No. 2 site and the proposed development concept, we request the following site-specific provisions be considered for the CPP By-law.

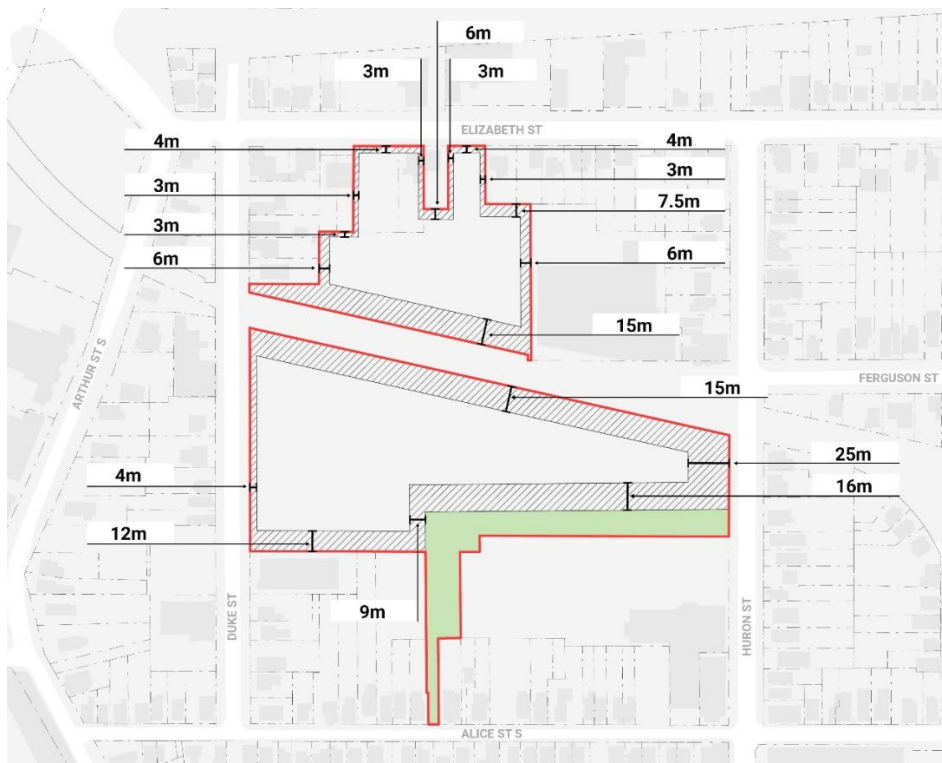
Permitted Land Uses: Although apartment dwelling units are the predominant land use in the proposed concept, it includes townhouses and identifies locations for non-residential uses that would be amenities for the neighbourhood and help to enliven public spaces. In addition to the uses currently permitted in an HDR precinct, including apartment building, convenience store, day care centre, long-term care facility and retirement residential facility, we propose the following uses

be permitted on the Plant No. 2 site. We also propose that the size of convenience stores, day care centres and the other non-residential uses below be capped at 500 square metres, in accordance with the Downtown Secondary Plan.

- Art gallery
- Artisan studio
- Fitness centre
- Live-work unit
- Mixed-use building
- Occasional use
- Restaurant
- Restaurant, take-out
- Retail establishment
- Service establishment
- Townhouse, back-to-back
- Townhouse, stacked
- Townhouse, stacked back-to-back
- Townhouse, rear access on street

Maximum Heights: We request that the CPP By-law carry forward the new height limits for the Plant No. 2 site in OPA 106, with the understanding the appeal against OPA 106 will need to be resolved before the new limits can be approved.

Minimum Setbacks: The location and shapes of the Plant No. 2 site make it difficult to clearly determine what constitutes front, side and rear lot lines and therefore how standard setback requirements would apply. We propose the CPP By-law include the following “Minimum Setbacks for Wood Plant No. 2 Site” map. Where a minimum setback of 3 metres is shown, it would be appropriate for the by-law to increase this to 6 metres where a wall has windows of a habitable space.



Proposed Minimum Setbacks

In addition to discussing the above proposed CPP By-law provisions, we would also like to confirm that it's the City's intention to use the OPA required to enable the CPP By-law to also update land use designations to align them with the higher densities effectively permitted by OPA 106 and the precincts proposed for the CPP By-law. The Downtown Secondary Plan currently designates portions of the Plant No. 2 site *Residential 1*, where the maximum permitted density is 35 units per hectare. Applying *Residential 2* to the entire site, and to other properties on the east side of Duke Street, would be in keeping with OPA 106 and the intentions for HDR precincts. We suggest also updating the *Future Park Policy Area 'A'* designation to reflect our current concept, but this may not be necessary since the Secondary Plan provides flexibility regarding the location, size and configuration of future parks.

Thank you for considering our requests and suggestions. We look forward to discussing them with the CPPS team.

Sincerely,

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

Tim Smith, RPP, MCIP
Principal

c: Ian Panabaker, Wood Development Group