



Mayor Cam Guthrie and Members of Council
City of Guelph
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Date: September 15, 2023

Our Ref: 142912

Subject: Written submission – Downtown Parking Master Plan and Related Zoning By-law Amendments
Woodhouse Investments Inc.

Dear Mayor Guthrie and Members of Council:

On behalf of our client, Woodhouse Investments Inc., please accept this written submission in support of our delegation at the September 26, 2023 Council meeting regarding the Downtown Parking Master Plan and related amendments to Zoning By-law (1995)-14864 and Zoning By-law (2023)-20790. This submission follows up on our previous letter dated August 31, 2023, and our delegation to Committee of the Whole on September 6, 2023.

We respectfully request that Council:

1. Amend the 1995 and 2023 Zoning By-laws to extend the exemption from minimum parking requirements for new residential uses in existing buildings from those buildings constructed prior to June 7, 1971 to those buildings constructed prior to April 18, 2023 in specialized downtown zones,
2. Direct City Staff to require no minimum parking spaces for affordable housing, seniors housing, and student housing as part of the cash-in-lieu of parking program, effective September 26, 2023 for any pilot agreements negotiated prior to Council formally approving a cash-in-lieu of parking program, anticipated in February 2024; and,
3. Amend the 1995 and 2023 Zoning By-laws to eliminate minimum parking rates for residential uses in all downtown zones.

1. Extending Exemption for Adding New Housing Within Existing Buildings

The current and approved zoning framework in Zoning By-law (1995)-14864 and Zoning By-law (2023)-20790 eliminates minimum parking requirements in specialized downtown zones for:

- (a) All non-residential uses, including office, retail, commercial, and hospitality/hotel uses;
- (b) New residential uses within existing buildings constructed prior to June 7, 1971.

At the Committee of the Whole meeting on September 6, 2023, City staff disclosed that the June 7, 1971 date was intended to grandparent existing buildings from the introduction of minimum parking requirements within the first City of Guelph Comprehensive Zoning By-law. In our opinion, the continuous urban street edge and human-scale built form in the historic downtown was facilitated by having no off-street parking requirements. The exemption for new and existing non-residential uses and for new residential uses in older buildings has supported economic development and the maintenance of this built form.

In our opinion, extending the exemption from minimum parking requirements for buildings constructed over the last 50 years in the historic downtown would support the City of Guelph in maintaining the existing continuous urban street edge and human-scale development while meeting the significant need for new housing units in the downtown.

As we indicated in our August 31, 2023 letter, it is not feasible to add new residential units within existing buildings with the currently proposed minimum parking rates. There is typically no space on these sites to add parking. Based on our client and our firm's experience, the proposed cash-in-lieu of parking rates are

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also too high at the proposed minimum parking rates to make adding new residential units feasible due to the challenges and costs in retrofitting commercial space for residential purposes.

We therefore recommend that Council amend the 1995 and 2023 Zoning By-laws to extend the exemption from minimum parking requirements for new residential uses in existing buildings from those buildings constructed prior to June 7, 1971 to those buildings constructed prior to April 18, 2023 in specialized downtown zones.

Extending the exemption would assist the City of Guelph in both adding much needed residential housing units in the historic downtown and maintain the existing built form, including the built form created with buildings constructed over the last 50 years. The proposed date also aligns with the adoption of the most recent comprehensive zoning by-law.

2. Cash in Lieu of Parking for Affordable, Seniors, and Student Housing

The city's consultants propose implementation of a cash-in-lieu of parking program that would require developers to pay approximately \$27,500 per required residential parking space not provided on-site to support municipal parking expansion when it is not feasible or desirable to meet parking requirements on-site in the opinion of the city.

Notably, the Downtown Parking Master Plan confirms that municipal parking spaces funded through cash-in-lieu are not reserved for users of the development project funding those spaces, and the spaces may or may not be constructed at the same time as the development projects. Therefore, and in our opinion, the cash-in-lieu program cannot be seen as directly meeting an assumed demand for parking from new residential units but instead as supporting the broader municipal parking system.

At the Committee of the Whole meeting on September 6, 2023, city staff indicated that they were contemplating reduced parking requirements for affordable housing, seniors housing, and student housing through the cash-in-lieu of parking program. However, city staff has not yet provided information about the scale of reduction contemplated.

In our opinion and experience, these forms of housing can require significant public incentives, particularly in the current interest rate environment. Further, parking demand for these users tends to be lower than for market housing, particularly in a downtown context that is highly walkable, well-served by local, express, and inter-city transit, and includes a wide range of uses necessary to meet daily needs.

We therefore recommend that Council direct City Staff to require no minimum parking spaces for affordable housing, seniors housing, and student housing as part of the cash-in-lieu of parking program, effective September 26, 2023 for any pilot agreements negotiated prior to Council formally approving a cash-in-lieu of parking program, anticipated in February 2024.

3. Minimum Parking Requirements

The city staff recommendation of a minimum parking rate of 0.85 parking spaces per unit in downtown zones (D.1, D.2, D.3, and D.3a) is based on the peak parking utilization study in the Downtown Parking Master Plan. This utilization study reviewed ten existing residential apartment sites within the Downtown Guelph Secondary Plan area, five of which were in site-specific D.1 zones within historic downtown Guelph downtown and five of which were outside historic downtown Guelph across the Speed River in the RM.6 and site-specific R.4B zones.

In our respectful opinion, the parking utilization study and related conclusions regarding appropriate minimum residential parking rates are flawed as the study:

- Does not review parking demand from apartments within buildings where no on-site parking spaces are provided, which has the effect of assuming the demand in these apartments is the same as when on-site parking spaces are provided;

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- Incorrectly averages dissimilar clusters of data together, which has the effect of overstating average parking demand within downtown zones and understating parking demand outside downtown zones; and,
- Notwithstanding the above flaws, recommends a minimum parking rate for only downtown zones of 0.85 parking spaces per unit that is higher than the minimum peak parking utilization rate of 0.38, higher than the average peak parking utilization rate in downtown zones of 0.69, and higher than the incorrectly blended average peak parking utilization rate of 0.79.

Our review of minimum parking standards in mid-sized cities near Guelph included the following cities where minimum parking rates have been eliminated:

- Historic downtowns within the City of Cambridge (Galt, Preston, and Hespeler);
- Downtown Kitchener;
- Downtown Hamilton for buildings with 12 units or fewer (13 units or greater require a minimum of 0.3 to 0.5 spaces per unit depending on the size of the unit); and,
- Downtown London, as well as in London's transit villages, rapid transit corridors, and historic main streets.

The Downtown Parking Master Plan does not provide any data to support the assertion that new residential units without off-street parking spaces generate a parking demand. The experience of other municipalities in proximity to Guelph supports that eliminating minimum parking requirements downtown is increasingly common and pervasive. This revolution in parking policy would provide significant incentives to develop much needed housing more affordably and without replacing the historic streetscape of downtown Guelph with extensive and expensive parking structures.

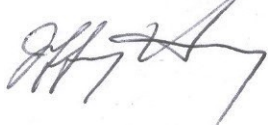
We therefore recommend that Council amend the 1995 and 2023 Zoning By-laws to eliminate minimum parking rates for residential uses in all downtown zones.

We would be happy to continue discussions regarding this matter with Council and City of Guelph planning staff in advance of the scheduled public meeting on September 26, 2023 when the proposed Zoning By-law amendments will be considered.

We will also present the above details to council at its meeting on September 26th and answer any related questions Council may have of us.

Thank you and respectfully submitted,

ARCADIS PROFESSIONAL SERVICES (CANADA) INC.



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JH/VL

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