

December 10, 2024

RE: Comment on Proposed Downtown Building Heights Study (Report 2024-488)

Dear Mayor and Councillors,

I would urge City Council not to proceed with a 'height study for new buildings' in Guelph's downtown, and instead rely on the Downtown Secondary Plan provisions noted in the current Official Plan. For the purposes of the discussion, I include here the consideration of density, massing, parking and other city standards, etc. in association with the additional space allowance provided by higher buildings. The following points outline the rationale for my thoughts:

A – the piecemeal planning analysis is a short timeline process to appease a 'grow in Ontario' fixated provincial government. As the council is aware, there has been a plethora of changing rules and requirements for planning in the province over the past few years. Nothing is certain and therefore long term investments in a proper, functioning and livable downtown community cannot be planned for at this time. The simple exercise of planning for bigger buildings with more opportunities for new space (without as perceived by the Province) restrictive municipal planning barriers on height, massing and density cannot be completed in isolation of other land use matters – provision of infrastructure, other municipal services (parks and recreation), health care facilities, etc. If Council is serious about completing this project, then a whole new downtown secondary planning exercise is warranted.

B – The existing downtown secondary plan (a nationally recognized award-winning plan) should not be tampered with at this time. The preparation of the secondary plan had a gestation period over several decades at the end and beginning of the new millennium. It was given endorsement by most involved and the various approval authorities in 2013; let the plan be implemented over the next several decades. In the preparation of the plan, serious recognition was given to the vision and substance of the special place known as downtown Guelph from the original John Galt plan of 1827 (I know this as I was part of the professional planning team working on this). Adding new development permissions at this time will only go to undermine the basic intent of the plan. The speculative fervor for bigger buildings at some time in the future can lead to blighted and underutilized properties in the short term, i.e., waiting for small property consolidations, cajoling hold-out private landowners to join in, etc.

C – A long term planning vision cannot be completed in the current environment where the provincial government keeps changing the planning rules in which we all operate. In the past few years a whole set of changing planning policy, legislation and financial requirements has been announced. How can you plan for buildings, infrastructure and the associated downtown community that has permanence over the long term? I give you a few illustrations here: i) the province has proclaimed that new buildings within proximity of the downtown parking station will not have minimum required parking provision standards; ii) the province has taken over the regulation and approval for the installation of new bike lanes on main streets where vehicle traffic may be impacted; a new PPS (Provincial **Planning** Statement Oct '24) has requirements that culturally-significant landscapes need to be preserved among other matters (see PPS section 4.6). How do all of these rule changes interplay with one another and impact the potential for a long term prosperous and well-functioning downtown Guelph community?

If Council is determined to proceed forth on the provincially-dictated examination of building heights for downtown buildings, I would urge you to reconsider the high density targets that have been assigned to downtown in your Official Plan post 2031. Guelph's downtown has gradually intensified over the past 188 years to a density now of 105 residents/jobs per hectare. It is hard to imagine how the city should go to 200 residents/jobs by 2051, a doubling nearly in only 25 years. This rate of growth and intensification will undermine the original planning vision as set out by John Galt and respected as a main foundation in the 2013 Downtown Secondary Plan.

On another associated note, the Province has stated in their new PPS that municipalities with strategic growth areas comprising 'Protected Major Transit Stations' (downtown Guelph) and having a density target of 200 or more should also plan for subway provision. PPS policy 2.4.2.2 indicates this! It is not stated but implied that without subways, transportation movement would be significantly impacted, and overall quality of life would be severely impacted in such a dense locale. I'm certain that Guelph is not contemplating the provision of subways in their long term infrastructure planning work; therefore, the City Official Plan 2051 200 downtown density target is not reasonable and should be modified. The PPS policy 2.4.2.4 provides for a policy planning mechanism to request the Province to have a reduced density target. As an overall comment also, the new PPS permits lower density targets across the land, and the pressure to intensify has been reduced; this policy provision provides additional opportunities for new residential/employment development areas to occur in many areas across Ontario (rural and urban).

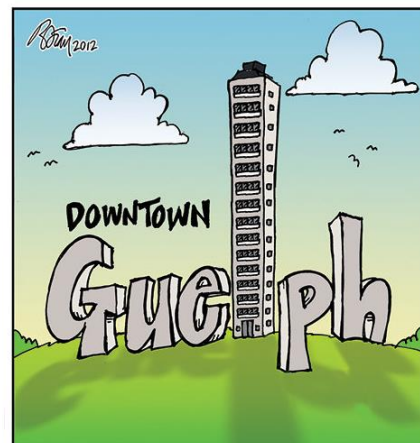
In summary, I would urge Council not to complete 'the increasing height and development opportunities' study for downtown Guelph; you have other more important planning work assignments to complete, i.e., the downtown cultural heritage district master plan. Downtown Guelph is a 'special place' and its recognition as such can be nurtured with careful land use planning for centuries to come.

Sincerely,

Dr. Paul Kraehling (MCIP RPP retired)



Source: Lillian Rosendal, Guelph Artist)2024



Source: Guelph Tribune (2012)