
Provided on behalf of the Wellington Catholic District School Board

February 7, 2025

Brenna Mackinnon
City of Guelph
1 Carden Street, Guelph
Ontario N1H 3A1
Email: brenna.mackinnon@guelph.ca

Electronic Copy

Re: COMMENT LETTER
Downtown Heights Official Plan Amendment

Dear Brenna Mackinnon,

On behalf of the Wellington Catholic District School Board (WCDSB), we confirm receipt of the Notice of Open House and Public Meeting for the Proposed Downtown Heights Official Plan Amendment, dated January 16, 2025. After a thorough review of the materials posted on the project consultation webpage, the Board respectfully submits the following comments and recommendations for your consideration:

Location:

The following WCDSB schools fall within the Downtown Heights Official Plan Amendment planning area:

- Sacred Heart Catholic School
- St. John Bosco Alternative School

Comments:

The Wellington Catholic District School Board (WCDSB) supports the City of Guelph's initiative to increase density in the Downtown Core as part of its efforts to achieve the Official Plan objective of 200 residents and jobs per hectare by 2051. We recognize that this strategy aligns with principles of sustainable urban growth, enhanced community amenities, and improved access to services—benefiting both current and future residents. Additionally, we acknowledge that the proposed increase in housing supply has the potential to improve housing affordability, helping to meet the needs of a growing and diverse population.

It is crucial that potential impacts on school sites be carefully mitigated through the development approvals process. While schools can harmoniously coexist within high-density environments, special attention must be given to construction activities that may temporarily disrupt the learning atmosphere. Factors such as noise, dust, air quality, traffic flow, and site safety require proactive planning to minimize disruptions and maintain a secure and stable educational environment.


One key area of concern specific to high density development is crane operation. The WCDSB acknowledges that cranes must swing freely with the wind when not in use; however, we recommend that crane swing plans or studies be included as part of the potential studies which may be required for development approval to address these risks. Furthermore, the WCDSB would seek to secure agreements with developers during the development approvals process to establish safety protocols. Through these agreements, the Board would seek prohibitions on live loads being carried over school property during school hours, ensuring that crane operations have a minimal impact on the safety and well-being of students, staff, and visitors.

Effective construction access management is also vital to minimizing disruptions to school operations. This includes implementing measures to regulate the staging of equipment, material deliveries, and on-site traffic flow. Access points to school grounds must remain clear and safe at all times, while noise and visual disturbances should be minimized. Construction timelines should also be coordinated to avoid peak school hours. As such, when high-density developments may affect a school site, the WCDSB would seek to be actively involved in the development of a construction management plan to ensure the safety and well-being of the school community.

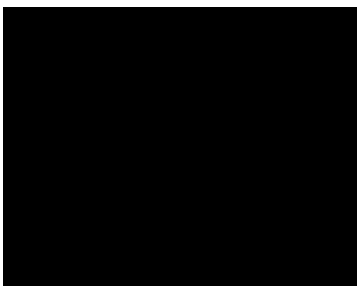
Shadows cast by tall buildings can also present challenges to school sites. Reduced natural daylight due to shadowing can negatively affect both indoor learning spaces and outdoor recreational areas, diminishing their functionality and comfort. Additionally, prolonged shadow coverage during the winter months can lead to ice accumulation on school grounds, increasing the risk of slips and falls and creating safety hazards for students, staff, and visitors. Addressing these issues through shadow studies and site-specific design solutions is essential to maintaining a safe, effective, and welcoming learning environment. The WCDSB is pleased to see that the draft Official Plan Amendment includes provisions for setbacks, and for shadow, view, and microclimatic studies as potential requirements of the development approvals process.

Our assessment of the proposed height schedule indicates that the areas south of WCDSB schools are designated for the lowest permitted heights. Given this, the WCDSB has no active concerns regarding shadow impacts at this time.

We will continue to monitor development growth in The City of Guelph on behalf of the WCDSB as it relates to the cumulative impact on local schools. The WCDSB also requests notification of any modifications, community consultations, appeals, or notices of decision related to this Official Plan Amendment.

Please note that further to the comments provided, the WCDSB reserves the right to revise their position as needed without further notice. Should you require additional information regarding these comments, please contact 

Sincerely,



Adam Brutto BURPI.
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cc: Tracy McLennan, Wellington Catholic District School Board