

Submission to Guelph City Council

Re: Ward Boundary Review

Submitted by Alan Hall [REDACTED] – June 21, 2021

Summary

- The six-ward and eight-ward maps recommended in the Consultants' Phase 2 Report are significantly flawed:
 - One option fails to provide effective representation for residents of southern Guelph
 - Two ward population estimates exceed the acceptable variance of 25% from the average
 - Some boundaries unnecessarily divide neighbourhoods between wards
- The alternative maps presented here provide improved population balance over the recommended options while at the same time better respect communities of interest.

Effective Representation

In 2017, the Ontario Municipal Board (now known as the LPAT) ruled that relative parity between wards is a pre-eminent consideration in devising wards, not just one factor. In Paragraph 103 of the decision *Dobrucki v. Hamilton (City)* <<https://canlii.ca/t/hpdt2>> , Executive Chair Bruce Krushelnicki and Member Paula Boutis wrote:

“In *Carter*, the court said that ‘deviations from voter parity may be justified on the grounds of . . . effective representation. Beyond this the dilution of one citizen’s vote as compared with another’s should not be countenanced.’ In other words, when formulating a ward system that achieves effective representation, one begins with parity and should only stray from a standard of parity if it is necessary to achieve or maintain effective representation. **Effective representation is not an excuse for ignoring population parity; on the contrary, it is one of the reasons that we must strive for parity.**” [boldface added]

The review of ward boundaries should start from the point of treating all residents of the city equally, and then making necessary changes to follow natural boundaries, avoid dividing recognized neighbourhoods, and keeping voters with common interests in the same ward.

Residents living in the southern half of the city - south of the Speed and Eramosa Rivers – comprise approximately 40% of the population of Guelph (2021: 39%, 2031: 42% -- based on population estimates and projections prepared by Watson and Associates Economists Ltd). Option 8-1 assigns three of eight wards (37.5%) to this area, but Option 6-2 only assigns two of six wards (33%). This is not acceptable, when a better solution was suggested during the public consultation process.

Population Variance

The Consultants' Phase 2 Report states that:

“The maximum acceptable threshold for population variance is 25 per cent above or below the average ward size.”

The Consultants have produced maps where two wards greatly exceed this limit:

- Option 6-2 – Ward 6 (2031 Pop. Est.) – 1.30 Variance (+30% above average)
- Option 8-1 – Ward 2 (2031 Pop. Est.) – 0.69 Variance (-31% below average)

Despite this, the report stated that both options are ‘largely successful’ at meeting the principle of future population balance by ward (affecting anticipated fairness of representation).

The following table shows the population variance (ward population divided by the city-wide average) for the current, recommended, and alternative ward maps.

		0.95-1.05	0.75-0.95, 1.05-1.25	Below 0.75, Above 1.25
Ward Options	Year	Optimal	Above/Below Optimal	Outside Range
Current Wards	2021		5	1
	2031	1	3	2
Consultants’ Option 6-2	2021	1	5	
	2031	1	4	1
Consultants’ Option 8-1	2021	3	5	
	2031	2	5	1
Six-Ward Alternative	2021	3	3	
	2031	1	5	
Seven-Ward Alternative	2021	3	4	
	2031	1	6	
Eight-Ward Alternative	2021	2	6	
	2031	3	5	

Guelph Neighbourhoods

As part of their Final Preliminary Options, the Consultants specifically mentioned 29 neighbourhoods and industrial/commercial zones. No map was provided. The reason given was that:

“There is no official neighbourhood map or list per se. We used our general knowledge and desktop review of online resources (e.g. realtor.ca, guelphheritage.ca) to sketch out neighbourhoods in the city and identify qualitatively their groupings within the proposed wards under each option.”

Despite this, the two ward maps recommended by the Consultants divide several Guelph neighbourhoods:

- Option 6-2
 - Exhibition Park is split between Wards 2 and 3 along Woolwich St
 - Hanlon Creek is split between Wards 5 and 6 along Kortright Rd
- Option 8-1
 - St. George's Park is split between Wards 1 and 3 along Stevenson Rd
 - St. Patrick's Ward ('The Ward') is split between Wards 1 and 3 along Stevenson Rd, the Guelph Junction Railway, and Victoria Rd
 - Exhibition Park is split between Wards 3 and 4 along London Rd

Six-Ward Alternative Map

The Consultants' Option 6-2 would simply redraw the wards in each half of the city (adding the small part of Ward 5 to the north) without resolving the population imbalance. My alternative map would create two wards in the south, three wards in the north, and a central ward which would include related communities along the Speed and Eramosa rivers.

- The boundary line between Wards 5 and 6 would be set at Hanlon Creek and Arkell Rd. This would provide a good population balance between the two wards and avoid splitting any communities. The revised Ward 5 would be centred around Kortright Rd, while Ward 6 would include the newer developments around Gordon St and Clair Rd, as well as the Kortright Hills and Woodland Glen neighbourhoods.
- The proposed central ward (Ward 4) would combine areas immediately north of the two rivers (The Junction, Sunny Acres, the Downtown core, and 'The Ward') as well as areas to the south (University of Guelph, Old University neighbourhood, planned Guelph Innovation District). All these communities have a strong connection to the University.
- Northern Guelph would be divided into three wards using Edinburgh Rd and Victoria Rd. The newer neighbourhoods of Grange Hill East and Brant would comprise Ward 1, while the older neighbourhoods of St. George's Park, Waverly and Exhibition Park would be included in Ward 2. The proposed Ward 3 would add the Onward Willow community to the neighbourhoods west of the Hanlon Expy.

The alternative map would keep all wards within a +/-17% population variance for both 2021 and 2031. This is well within the *Carter* standard set by the Supreme Court of Canada.

Seven-Ward Alternative Map

If there is a desire to give additional representation to the south end while maintaining the four existing wards north of the Speed and Eramosa rivers to the greatest extent possible, one solution would be to add a seventh ward to the city.

Eight-Ward Alternative Map

I am recommending six changes to Consultants' Option 8-1 to improve the map.

- Adding the Riverside Park area (Woolwich to the Speed River, from Speedvale to the northern city limits) would bring the population of Ward 2 within the acceptable range. This area is part of the current Ward 2 and adds two seniors' residences (Evergreen and Riverside Glen) to an area with similar demographics.
- Moving the area between the GEXR (formerly CN) railway and the Eramosa River from Ward 1 to Ward 3 makes sense, since the area is considered part of The Ward neighbourhood.
- The planned Guelph Innovation District when built will have a strong connection to the University of Guelph. It should be added to Ward 6.
- Using Paisley Rd and Paisley St as the boundary between Wards 3 and 4 would unite the Exhibition Park area in a single ward, as well as linking the areas along Waterloo Ave to the Downtown core.
- Hanlon Expy as a boundary should be extended north to the city limits.
- The proposed wards should be renumbered to better identify with the existing wards:

Consultants' Option 8-1	Eight-Ward Alternative
Ward 1	Ward 8
Ward 2	Ward 2
Ward 3	Ward 1
Ward 4	Ward 3
Ward 5	Ward 4
Ward 6	Ward 5
Ward 7	Ward 6
Ward 8	Ward 7

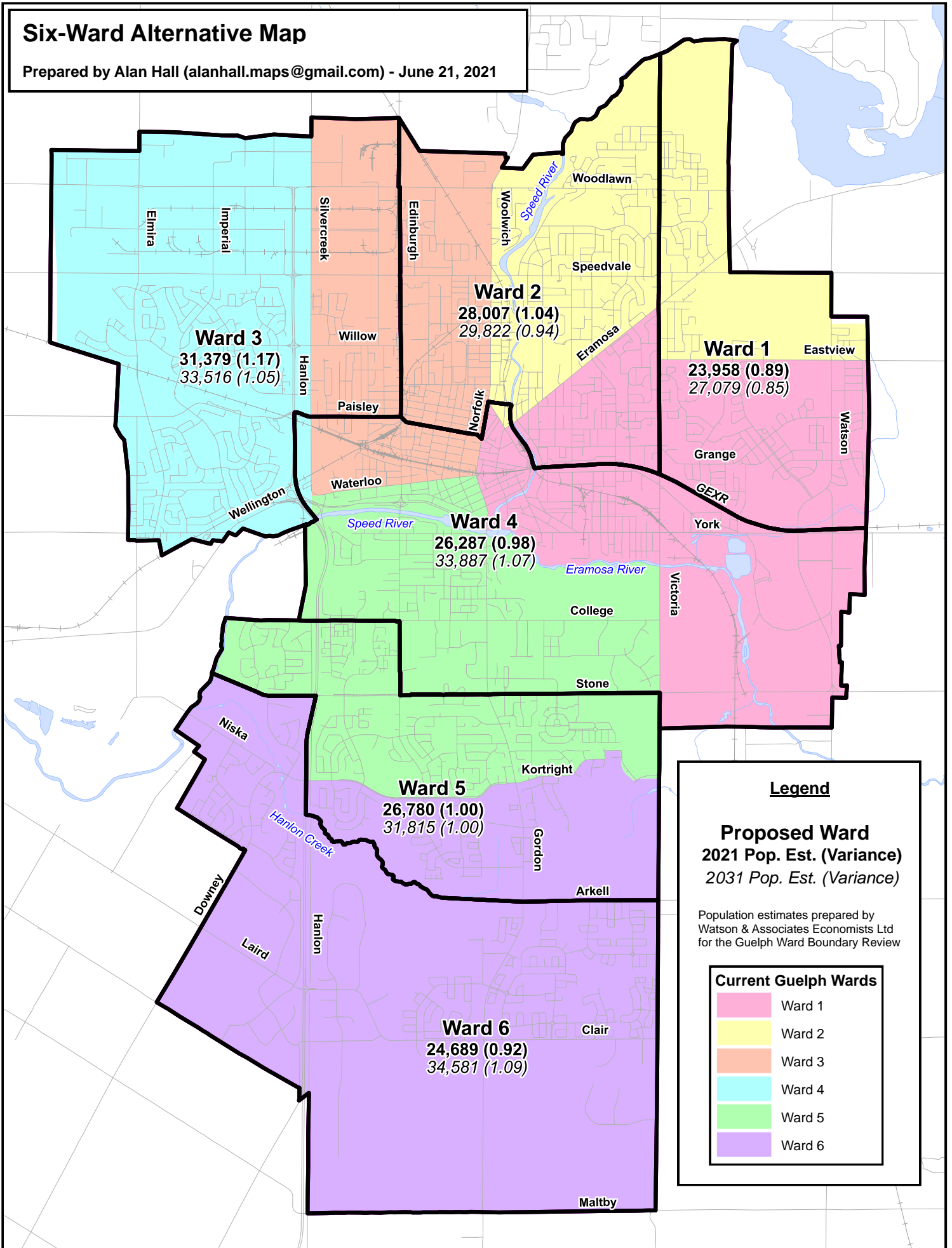
My alternative maps can be viewed here: <https://bit.ly/GuelphWards>

Thank you for your consideration. Any comments or questions may be sent to me at:



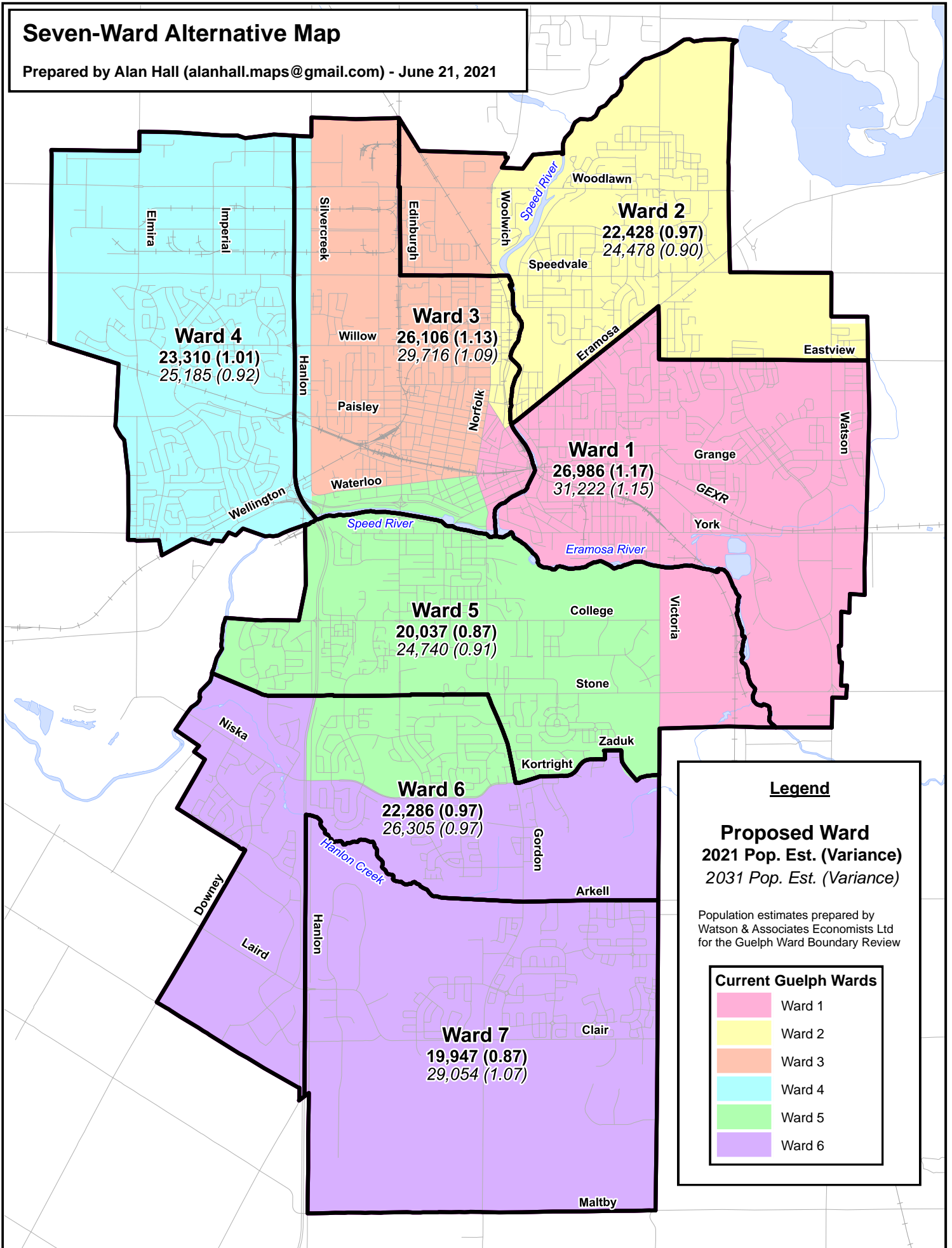
Six-Ward Alternative Map

Prepared by Alan Hall (alanhall.maps@gmail.com) - June 21, 2021



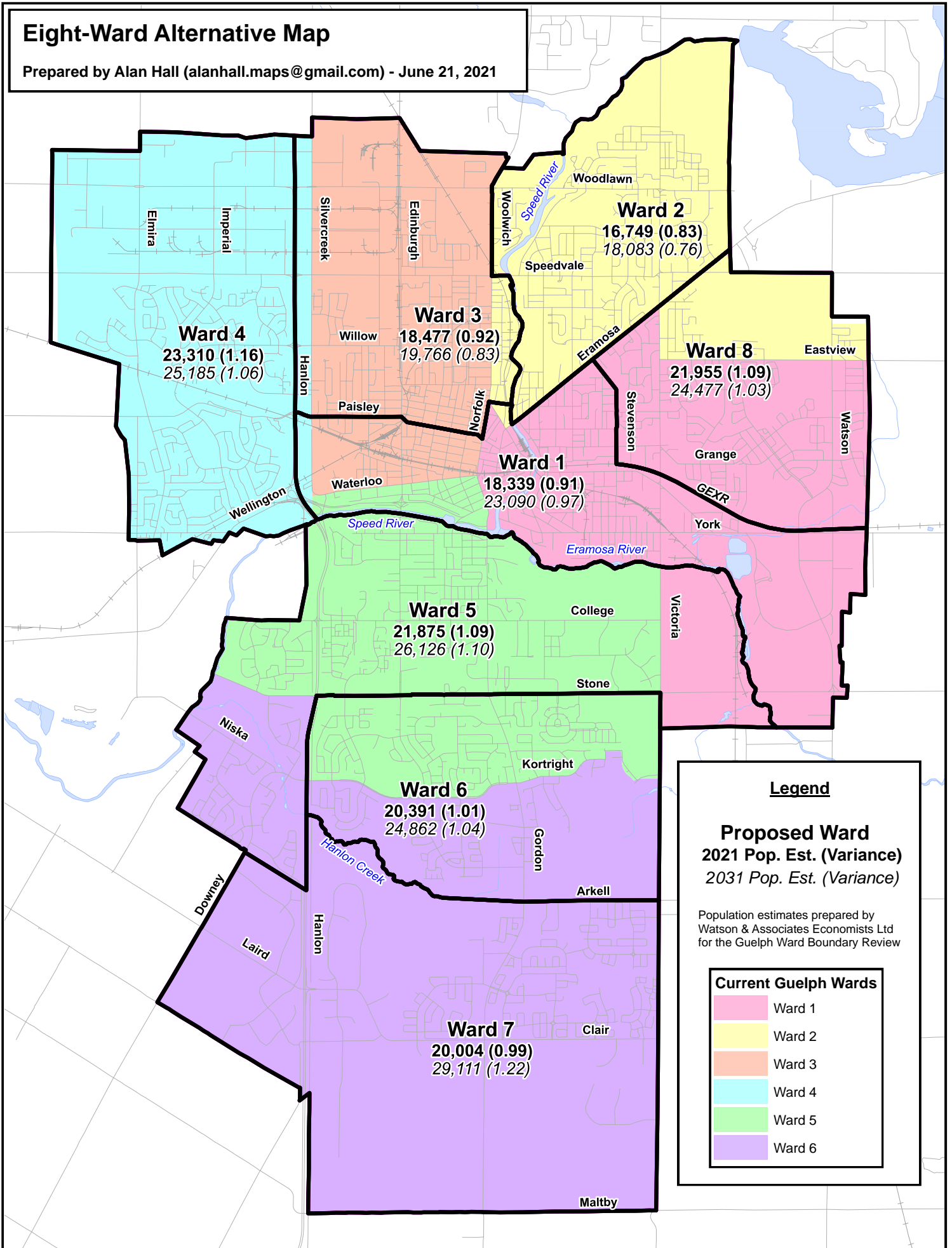
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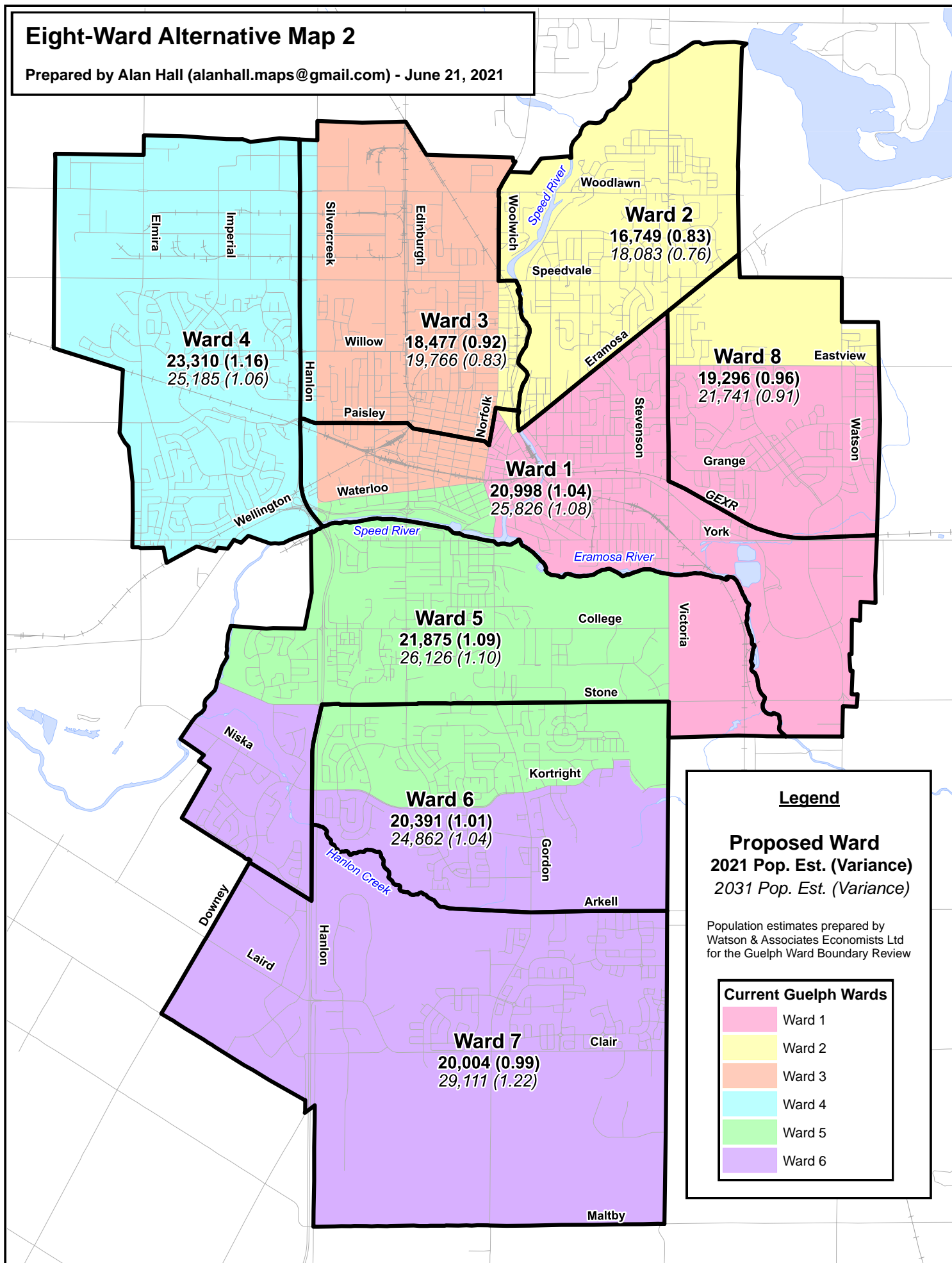
Eight-Ward Alternative Map

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Eight-Ward Alternative Map 2

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Legend

Proposed Ward
2021 Pop. Est. (Variance)
2031 Pop. Est. (Variance)

Population estimates prepared by
 Watson & Associates Economists Ltd
 for the Guelph Ward Boundary Review

Current Guelph Wards

- Ward 1
- Ward 2
- Ward 3
- Ward 4
- Ward 5
- Ward 6