

Attachment 3 Shaping Guelph Growth Scenarios Responses to Comments

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| 1. | Future mix of new dwellings | The City has not assessed the demand and supply of housing by dwelling unit, as required by A Place to Grow and the Land Needs Methodology. | The proposed Growth Management Strategy contains the Land Needs Assessment as is required by A Place to Grow. Further details are contained in the Long-term Population and Housing Growth report completed by Shaping Guelph consultants, Watson and Associates Ltd., released in January 2022 addresses the demand for housing by dwelling type. |
| 2. | Future mix of new dwellings | Planning policy will influence the shift toward high-density development. This will create an oversupply of apartments and an undersupply of ground-oriented homes to 2051. | A Place to Grow directs municipalities to diversify their existing housing stock and consider the range and mix of housing options and densities of the existing housing stock. More than half of Guelph's existing housing stock is in the form of low density single detached dwellings. Affordability of ground-oriented housing, especially single detached homes has decreased significantly since the last Growth Management Strategy was completed in 2009. There is a need to ensure that sufficient housing opportunities exist in Guelph (and across the Greater Golden Horseshoe region) to accommodate a range of housing types for all income levels, including market housing, affordable housing, assisted living and shelter accommodations. The draft Growth Management Strategy will allow for this variety of housing options, including planning for |

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| | | | <p>opportunities for future ground-oriented housing.</p> <p>It is also important to recognize that while the City's population base is growing it is also getting older. Between 2016 and 2051, the 75+ age group is forecast to represent the fastest growing population age group. With respect to future housing needs, strong population growth in the 75+ age group is anticipated to place increasing demand on medium- and high-density forms including seniors' housing and affordable housing options.</p> <p>Through consultation on the City's 3 scenarios for growth, we heard that there was a strong preference for the Growth Management Strategy to increase densities and diversify the existing housing stock through the creation of new townhomes and apartments. In order to help achieve a balanced mix of housing through future supply, Shaping Guelph explored additional opportunities for future ground-oriented housing, including single and semi-detached dwellings and townhouses through the redesignation of Rolling Hills and within the Dolime quarry lands (proposed to be annexed in 2022). There will also be additional opportunities for ground-oriented housing through the proposed Clair-Maltby Secondary Plan as well as within the Guelph Innovation District.</p> |

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| 3. | Housing Supply and demand | The housing supply in Guelph is policy driven and not market driven. | A Place to Grow directs municipalities to consider market demand when determining their future housing mixes. The Long-term Population and Housing Growth report released in December 2021 addresses how market demand was considered in the future supply of housing to 2051. While housing market demand is important when considering long-range, land-use planning and housing objectives, there are other considerations that must also be addressed within the context of other provincial interests, namely: ensuring the efficient use of land, resources, and infrastructure; providing a clean and healthy environment for current and future generations; providing options for affordable housing; diversifying the economic base; and supporting job creation. |
| 4. | Housing supply and demand | More detail is needed on the demographic and socio-economic drivers of housing intensification in the City. | <p>A Place to Grow directs municipalities in the Greater Golden Horseshoe, such as Guelph, to prioritize future residential growth through intensification. Through consultation, we also heard there was a strong desire to grow within our existing boundaries through prioritizing intensification.</p> <p>A Long-term population and Housing Growth report completed by Watson and Associates Ltd., released in December of 2021 will also provide the level of detail and analysis of the demographic and socio-economic factors that are driving demand for intensification. This</p> |

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| | | | same report provides insight on housing demand for the Baby-Boomer generation, which is expected to shift more towards higher density forms of housing as the generation continues to age. |
| 5. | Housing supply and demand | The Housing Analysis and Strategy did not consider that the Baby-Boomer generation has chosen to age in place, which has not translated into single detached homes entering the real estate market for younger generations. | Between 2016 and 2051, the Baby-Boomer generation is forecast to become the fastest growing age group. Housing demand for this generation is expected to shift towards higher density forms of housing as the generation continues to age. The Long-term population and Housing Growth report completed by Watson and Associates Ltd. and released in December of 2021 provides additional insight on housing demand for the Baby-Boomer generation. |
| 6. | Housing supply and demand | the City's analysis appears to be inconsistent with the estimate of housing market demand by Hemson Consulting in the June 2020 Technical Report, which was the basis for the updated forecasts in Schedule 3 of A Place to Grow. | The Greater Golden Horseshoe: Growth Forecasts to 2051 Technical Report produced by Hemson Consulting Ltd. was completed without detailed consultation with municipalities. The Hemson report states that the purpose of the housing forecasts contained in the report is not to replicate or predict the housing mix determined through each municipality's A Place to Grow conformity work and that housing mixes continue to be decided by municipalities through their local planning processes. |
| 7. | Housing supply and demand | The three scenarios provided in the Growth Scenario Technical Brief do not include a scenario that would | A Long-term population and Housing Growth report completed by Watson and Associates Ltd., released in January 2022, provides the level of detail and analysis of the demographic |

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| | | reflect market demand for housing based on unit type. | and socio-economic factors that are driving demand for housing. |
| 8. | Housing supply and demand | The COVID-19 pandemic has highlighted people's desire for space; space for home offices, home schooling, home gyms, and backyards for children to play. | People's desire for space were largely a factor of offices, schools, and amenities being closed during the pandemic for public safety reasons. Today, we are seeing workers beginning their return to the office, the reopening of in-classroom learning, and parks and playgrounds are open for families to enjoy. |
| 9. | Housing supply and demand | If the City wants to remain competitive in its ability to attract new employers and business then choice in the housing market also needs to be a priority so people can both live and work in the same city. | There is a need to ensure that sufficient housing opportunities exist in Guelph (and across the Greater Golden Horseshoe region) to accommodate a range of housing types for all income levels. The proposed Growth Management Strategy provides for this range and mix of future housing options, which will include opportunities for ground-oriented housing, such as single and semi-detached, townhomes, as well as higher density housing units. |
| 10. | Housing supply and demand | The Clair-Maltby Secondary Plan needs to be approved in a timely manner to ensure there are no interruptions to housing supply. | A portion of the City's future housing supply in the proposed Growth Management Strategy relies on the supply of housing proposed in the Clair-Maltby Secondary Plan. The secondary plan had a public meeting held in September of 2021 and is currently scheduled for approval in 2022. |
| 11. | Intensification Target | There is no reasonable justification in Scenario 3 for allowing 55% of the future residential growth to be allocated to the Built-Up Area. | Through consultations on Shaping Guelph, we asked questions about the types of scenarios for growth to 2051 that we should explore. We heard that one scenario should explore a higher rate of intensification, which subsequently |

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| | | | <p>became an option for growth presented in Scenario 3 where an intensification target of 55% was tested.</p> <p>The intensification target contained in A Place to Grow is a minimum target, and the Plan provides municipalities with the flexibility to plan for a higher intensification target. A Place to Grow also allows municipalities to request an alternative target where it is determined that it cannot achieve the minimum intensification target of the Plan. Following agreements to annex the Dolime quarry lands, which are proposed to become part of Guelph's designated greenfield area in 2022, the City's intensification target to 2051 will drop to an estimated 46%. While the same amount of residential development is planned for the City's built-up area to 2051 as was presented in Scenario 2, adding additional housing supply in the designated greenfield area will impact the City's ability to achieve the minimum intensification target of 50%. As a result, the City of Guelph is proposing to request an alternative intensification target from the Province. Without the annexation of the Dolime quarry lands, the City would be planning for an intensification target as presented in Scenario 2 of 50% and not 55%.</p> |
| 12. | Employment Lands | Achievement of the Employment Land Strategy will require considerable change from recent development | The draft Growth Management Strategy includes all of the recommendations presented in the Employment Lands Strategy to ensure |

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| | | trends and the City should consider a wider range of changes to the urban structure. | <p>that Guelph will be able to respond and adapt to structural changes in the economy.</p> <p>To ensure a successful implementation of the Employment Lands Strategy, the Growth Management Strategy recommends an Employment Area intensification strategy be undertaken to assess and evaluate the intensification potential and opportunities on Guelph's employment lands over the long-term. Additionally, the strategy recommends that a system be developed for monitoring and tracking employment land supply and demand data to assist with long term planning and land needs forecasting. These will serve as tools to help assist Guelph in achieving the long-term goals for its employment lands.</p> |
| 13. | Strategic Growth Areas | It is important that the City also look at areas surrounding the existing nodes and corridors to be included in the Strategic Growth Areas | Lands within and around the City's existing nodes and corridors were analyzed and evaluated for their potential to be identified as a Strategic Growth Area. Lands with future intensification potential that would be compatible with mixed-use and residential development was generally included as part of a Strategic Growth Areas as identified in the proposed Growth Management Strategy. |
| 14. | Strategic Growth Areas | The current intensification corridors in the existing Official Plan do not contain sufficient lands to accommodate the amount of intensification required to achieve | Through Shaping Guelph, the City's existing built-up area was examined under the current Official Plan policies and growth framework, and it was determined that the potential exists to meet Guelph's intensification target to the 2051 |

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| | | future growth during the planning horizon. | <p>planning horizon. This was evaluated as part of Scenario 1. More details can be found in the <u>Growth Scenarios Technical Brief</u>.</p> <p>Through Shaping Guelph, an evaluation of the City's existing urban structure, which included an assessment of the nodes and corridors was completed and served as a foundation to establish an updated urban structure that consists of Strategic Growth Areas. Similar to our existing nodes and corridors, these Strategic Growth Areas will become the focus for intensification. The Growth Management Strategy proposes to include additional lands surrounding our existing nodes and corridors as part of a Strategic Growth Area. These additional lands include areas slated for higher density development in Guelph's west end, lands designated for higher density around Stone Road and Edinburgh, and new Strategic Growth Areas identified in the Guelph Innovation District Secondary Plan, and the Clair-Maltby Secondary Plan.</p> <p>The Growth Management Strategy also proposes to increase densities and heights within the City's Strategic Growth Areas to allow for residential developments up to a maximum of 250 units per hectare and 14 storeys in heights within Community Mixed-Use Centre and the Corridor Mixed-Use 1 designations. This represents an increase from</p> |

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| | | | <p>the maximum 10 storeys and 150 units per hectare within Community Mixed-Use Centres Designations, and an increase from 6 storeys and 150 units per hectare within the Mixed-Use Corridor designations.</p> <p>All of these changes proposed as part of the Growth Management Strategy will assist in helping to achieve the targets and forecasts contained in A Place to Grow.</p> |
| 15. | Strategic Growth Areas | The City should be considering additional Intensification Corridors to ensure there is sufficient opportunity to accommodate future growth to 2051. | <p>Through Shaping Guelph, a review of the City's existing urban structure consisting of nodes and corridors in addition to some potential new areas to become the focus for higher density, mixed-used intensification and new development be identified as Strategic Growth Areas. Part of this evaluation included reviewing the potential for future intensification and access to multi-modal transportation options, including transit.</p> <p>The results of this evaluation were presented in the Urban Structure Technical Brief released in April of 2021. A total of 15 potential Strategic Growth Areas across the City were considered and evaluated as part of that process. The final proposed urban structure and Strategic Growth Areas are presented in the proposed Growth Management Strategy.</p> |
| 16. | Strategic Growth Areas | The City should consider allowing for increased densities within the Strategic Growth Areas. | Through consultations on Shaping Guelph, we heard that intensification should be focussed within our Strategic Growth Areas, especially |

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| | | | <p>within our Built-Up Area. In response to this feedback, the Growth Management Strategy is proposing to increase densities and heights within the City's Strategic Growth Areas to allow for residential developments up to a maximum of 250 units per hectare within Community Mixed-Use Centre and Mixed-Use Corridor 1 designations that are located within the proposed Strategic Growth Areas. This represents an increase from 150 units per hectare today within Community Mixed-Use Centres and the Mixed-Use Corridor designations.</p> |
| 17. | Strategic Growth Areas | <p>The lands along Speedvale Avenue West, west of Edinburgh Road North should be considered for designation as an intensification corridor. The mix of uses in this corridor should also allow for the types of uses currently permitted within the Corporate Business Park designation.</p> | <p>Intensification corridors, or Strategic Growth Areas as they are referred to in A Place to Grow and the Growth Management Strategy are intended to consist of higher density mixed-use compact forms of development. The designations as they currently exist along the south side of Speedvale Avenue West are largely Service Commercial with some Industrial, Corporate Business Park and Major Institutional. These designations allow for uses that are generally of a nature that is lower density. One of the ways in which the Growth Management Strategy intends to promote intensification and achieve increased densities within our Strategic Growth Areas is by allowing for increased residential heights and densities up to 250 units per hectare and 14 storeys in height. The addition of residential uses on the south side of Speedvale Avenue West would</p> |

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| | | | <p>result in land use compatibility issues with some of the surrounding heavy industrial manufacturing activities. These lands currently designated Service Commercial along the south side of Speedvale Avenue West act as a transition buffer between the residential uses to the south and the heavier industrial manufacturing uses to the north. Reducing land use compatibility issues by not allowing for future high density residential development in Strategic Growth Areas would result in overall densities that may prove to be too low to meet the definition of a Strategic Growth Area. Further to this, Strategic Growth Areas are to be located in areas with existing or planned frequent transit. Portions of Speedvale Avenue West that extend to the City's boundary west of Elmira Road North may not be adequately serviced by transit.</p> <p>The Corporate Business Park designation allows for uses such as warehousing that are generally considered to be low density employment uses. Allowing for these uses to extend along a potential Speedvale Avenue West Strategic Growth Area would result in overall densities that would be too low to meet the definition of a Strategic Growth Area.</p> |
| 18. | Strategic Growth Areas | The Service Commercial designated lands along Wellington Street West should be considered for designation as an intensification corridor. | This location of Wellington Street West is bordered by Guelph's Wastewater Treatment Plant on the south side of the street, which |

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| | | | <p>would not be available for redevelopment, and is also bisected by a major hydro corridor.</p> <p>When considering the existing narrow lot fabric of this area, there would be limited opportunities for higher density, mixed-use intensification in this area of the city. This would be potentially further compounded if there are additional residential setback considerations from the adjacent active rail line that must be considered.</p> |
| 19. | Intensification of Neighbourhood Commercial Centres | Neighbourhood Commercial Centres should allow for a wider range of uses including residential and other employment uses and allow for greater height and density than what is currently permitted. | <p>A review of the City's commercial policies was undertaken between 2017 and 2019 and approved in early 2020. One of the objectives of this review was to analyze the permitted uses within the Neighbourhood Commercial Centres. The purpose of these centres is to support and service surrounding residential neighbourhoods and therefore the mix of uses within these centres should be complimentary to the surrounding residential neighbourhoods. Residential uses are permitted within Neighbourhood Commercial Centres up to densities of 100 units per hectare and there is no change to that proposed through the Growth Management Strategy.</p> <p>Through consultation, we heard that intensification should largely be focussed within our nodes and corridors (now referred to as Strategic Growth Areas) and as a result, the Growth Management Strategy is proposing to</p> |

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| | | | <p>allow for increased heights and densities within the Commercial Mixed-Use Centre, Mixed Use Corridor 1, and High Density Residential designations within the Strategic Growth Areas. Neighbourhood Commercial Centres are generally comprised of smaller properties in close proximity to residential uses. Allowing for increased residential heights and densities within the smaller Neighbourhood Commercial Centres could create density and or height transition issues to surrounding neighbourhoods.</p> |

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| 20. | Traffic | Increasing densities within the Built-Up Area will result in more traffic congestion. | <p>The proposed Growth Management Strategy is proposing to provide for more residential, mixed-use and employment opportunities in closer proximity to one another, with the goal of reducing the number of trips made using vehicles to shop, play, or work.</p> <p>Increasing densities within the Built-Up Area will create the potential for a more efficient transit system and also allow for more active transportation options that will increase transportation mode share with the same goal of reduce the number of trips made by vehicle.</p> <p>An update to the Transportation Master Plan will also be recommending road improvements where necessary to accommodate the increased population within the Built-Up Area.</p> |

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| 21. | Servicing and infrastructure capacity | The infrastructure servicing studies should all be completed before the City determines a preferred growth option. | Throughout the Shaping Guelph process, there has been significant co-ordination among the various infrastructure master plans. Each of these master plans relies on varying levels of input from the Growth Management Strategy, while the Growth Management Strategy also relies on these master plans to ensure that there will be sufficient infrastructure available to accommodate the planned future growth to 2051. Master plans, such as: the Water Supply Master Plan; the Wastewater Treatment and Biosolids Master Plan; the Transportation Master Plan; the Transit Master Plan; and, the Water and Wastewater Servicing Master Plan, including a fiscal impact assessment of the future costs associated with the planned future growth are all scheduled to be completed in advance of the final approval of A Place to Grow conformity work. |
| 22. | Rolling Hills | Guelph must direct a significant portion of its future growth in the Built-Up Area. Adding Area 1 of Rolling Hills represents the single largest opportunity to add housing to the built-up area. Not allowing for intensification within Rolling Hills would put a burden on the remaining neighbourhoods throughout Guelph. | Allowing for development in Rolling Hills will provide for additional housing supply to 2051 and reduce the number of units that would otherwise need to be distributed elsewhere throughout the remaining built-up area. Further, the development of Rolling Hills will allow for a greater diversity of the City's future housing mix that will be constructed to 2051 by |

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| | | | <p>allowing more ground-related housing to be constructed within the built-up area.</p> <p>Following the agreements to annex the Dolime quarry lands, which will become part of Guelph's designated greenfield area, the City will be requesting an intensification target of 46% to 2051. While the same amount of residential development is planned for the City's built-up area to 2051, adding additional housing supply in the designated greenfield area on the Dolime quarry lands will reduce the City's overall intensification target.</p> |
| 23. | Rolling Hills | The proposed designations of the northern section of Rolling Hills represent a range and mix of housing options that would be transit supportive. | These designations will allow for the northern section of Rolling Hills to develop in a manner that would be similar to the surrounding communities on the north side of Clair Road East and the Dallan subdivision to the west. The densities and forms of development proposed through the redesignation of the northern section of Rolling Hills would help to support a more efficient transit service along Clair Road East. |
| 24. | Rolling Hills | Allowing for the development of the northern section of Rolling Hills while restricting development in the southern section strikes a fair balance and is respectful of the concerns expressed by residents in both areas of Rolling Hills. | We've been hearing through consultation and written correspondence that a number of residents of Rolling Hills are supportive of the future plan to develop the northern portion of the neighbourhood. For this reason, we are proposing intensification of only the northern section of Rolling Hills over the horizon of the Plan to 2051. The southern section is not expected to have municipal services extended |

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| | | | prior to 2051, and redevelopment of the southern section will not be permitted prior to municipal services being in place. |
| 25. | Rolling Hills | Allowing for development in Rolling Hills would make efficient use of city infrastructure. | The Rolling Hills neighbourhood is within Guelph's Built-Up Area. Intensification of the built-up area makes more efficient use of land and infrastructure by using some of the unrealized capacity of roads, sewers, schools. The intensification of Rolling Hills as it is proposed in the Growth Management Strategy would also provide for transit-supportive densities that would enhance the efficiency of transit routes along Clair Road as identified in the Transit Master Plan. Rolling Hills is also in close proximity to a major node located at Clair Road and Gordon Street, which would provide future residents of Rolling Hills with easy access to the many amenities offered in the node. |
| 26. | Rolling Hills | Concerns about allowing vehicular connections between the northern and southern sections of Rolling Hills | Development within the southern section of Rolling Hills is not expected within the planning horizon of the Official Plan to 2051. A vehicular connection between the northern and southern sections of the neighbourhood would be assessed through future development applications should one be proposed. |
| 27. | Rolling Hills | Municipal services should be extended to Rolling Hills prior to development | All new development within the City, including Rolling Hills would require municipal services to be in place, or an approved servicing plan before the development would be permitted to proceed. |
| 28. | Rolling Hills | Concerns around the protection of the Natural Heritage System | All new development in the City of Guelph is subject to the policies of the Natural Heritage |

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| | | | System of the Official Plan. When the Rolling Hills neighbourhood was being studied as part of the Clair-Maltby Secondary Plan, the Natural Heritage System (NHS) underwent further evaluation as background to that plan. As such there are some recommended adjustments to the Natural Heritage System in the neighbourhood that will remain protected from development. Any additional activities within the NHS, including pedestrian and cycling linkages would be done in accordance with the NHS policies of the Official Plan. These refinements to the Natural Heritage System have been presented in the proposed land use designations for Rolling Hills in figure 4-6 of Section 4.3 of the Growth Management Strategy. |
| 29. | Rolling Hills | Pedestrian and cycling connections between the northern and southern sections of Rolling Hills should respect the Natural Heritage System | Development within the southern section of Rolling Hills is not expected within the planning horizon of the Official Plan to 2051, and as such, there are no immediate plans to provide for pedestrian or cycling linkages between the northern and southern sections. If these linkages were to be introduced, they would be provided in accordance with the Natural Heritage System policies of the Official Plan. |
| 30. | Rolling Hills | Concerns about density and height transitions between the northern and southern sections of Rolling Hills | The proposed Rolling Hills land use designations in the Growth Management Strategy provide for height and density transitions between the northern and southern sections of Rolling Hills. The Medium Density Residential designation along Clair Road East would allow for densities |

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| | | | up to 100 units per hectare and 6 storeys in height, while the Low Density Residential would allow for densities up to 60 units per hectare at a maximum of 3 storeys, providing for a height and density transition between the Medium Density Residential and Rolling Hills Estate Residential designations. |
| 31. | Rolling Hills | An Urban-Rural Transition Zone should be included in Rolling Hills along Victoria Road South. | With the revisions to the Natural Heritage System in the Rolling Hills neighbourhood, the Natural Heritage System itself would provide for a suitable transition between development in Rolling Hills and the rural development in Puslinch Township on the eastern side of Victoria Road South. |
| 32. | Rolling Hills | With the type of development occurring around Rolling Hills including apartments along the north side of Clair Road East and in the adjacent Dallan subdivision, it makes sense to include the northern section of Rolling Hills for consideration as an area of intensification. | The proposed designations in Rolling Hills will allow for developments that are similar to that of the north side of Clair Road East and within the Dallan subdivision to the west. |
| 33. | Rolling Hills | Housing affordability has become an issue and allowing for the redevelopment of Rolling Hills would allow for increased housing options and support the demand for housing. | There is a need to ensure that there are sufficient opportunities for future housing exist in Guelph to accommodate a range and mix of housing for all income levels. The proposed Growth Management Strategy aims to provide a full range and mix of housing, including affordable housing options. Rolling Hills is one of those areas that will contribute to ensure that a range and mix of housing can be |

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| | | | <p>provided to meet the demand for housing at all income levels.</p> <p>The City of Guelph has an approved affordable housing strategy which provides a set of tools for the City to monitor and manage housing affordability. Through that strategy and our Official Plan policies, the City has a target that 30 percent of all new residential development in any given year would be affordable. The benchmarks for affordability and ownership and rental are set each year. As part of that strategy, Council approved an affordable housing financial incentives program. Funding for that program is determined by Council on an annual basis.</p> |
| 34. | Rolling Hills | Rolling Hills is a unique area, home to large rural estate development and should be preserved. | The proposed designations for Rolling Hills will allow for development patterns that are similar to that which is occurring on the lands surrounding the neighbourhood, such as along the north side of Clair Road East and within the Dallan subdivision to the West. The proposed Rolling Hills Estate Residential designation will maintain the existing estate housing in areas where servicing is not expected to be provided and the natural heritage system constrains further development on individual lots. |
| 35. | Rolling Hills | There are restrictive covenants in place that do not allow for development of Rolling Hills | Following a legal review of the restrictive covenants on title, it is understood that most of these covenants would begin to expire during the early 2030s. |

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| 36. | Rolling Hills | Allowing for development in Rolling Hills would have a detrimental effect on the Paris-Galt Moraine, home to critical groundwater resources that provide drinking water for many communities, including Guelph. | <p>The Natural Heritage System recognizes the importance of the Paris-Galt Moraine and protects areas which contain areas of significant landform as part of the system.</p> <p>Any proposed development of the area will conform to requirements of the City's Official Plan to ensure continued protection of natural heritage and water resources.</p> |
| 37. | Rolling Hills | Allowing for development in Rolling Hills would contribute to a reduction of the City's overall canopy coverage. | <p>The Natural Heritage System which has been refined for the Rolling Hills neighbourhood to include additional features for protection also provides for additional protections for trees in the area. This additional protection will help contribute to the City's goal of an overall canopy coverage of 40%. The refinements to the Natural Heritage System have been presented in the proposed land use designations for Rolling Hills in figure 4-6 of Section 4.3 of the Growth Management Strategy.</p> |
| 38. | Rolling Hills | There is sufficient existing capacity within the City of Guelph to accommodate the forecasted population growth to 2051, without the need to include Rolling Hills. | <p>The inclusion of Rolling Hills into the City's Growth Management Strategy to 2051 allows for the achievement of several goals:</p> <ul style="list-style-type: none"> • It provides for more ground-related housing options within the City's existing built-up area, allowing for a more diversified mix of housing options to 2051; • It will help to contribute to the City's overall intensification target; and, |

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| | | | It will make more efficient use of our existing infrastructure in the area, including roads, schools, and transit. It also meets the objectives of A Place to Grow to ensure that intensification opportunities are provided throughout the Built-up area and represents an equitable distribution of growth through various neighbourhoods in the city. |
| 39. | Rolling Hills | Redevelopment the northern section of Rolling Hills would erode the sense of community in the southern section. | As it is currently proposed, there is a transition between heights and densities from the northern section to the southern section. The Natural Heritage System would also act as a boundary between the two sections of the Rolling Hills neighbourhood. |
| 40. | Rolling Hills | The Rolling Hills neighbourhood provides for the types of homes where business executives would want to live and would continue to attract businesses. | There is a need to ensure that sufficient housing opportunities exist in Guelph, including accommodating a range of housing types for all income levels. Through 2051, it is proposed that the Rolling Hills neighbourhood would retain a number of the existing homes in the neighbourhood within the Rolling Hills Estate Residential designation. This designation applies to lands that would be restricted from future development due to features protected through the Natural Heritage System. It is also proposed that the southern portion of Rolling Hills will remain as-is through the horizon of the Official Plan to 2051 as there are no plans to extend municipal services to that part of the City, which would prevent redevelopment from occurring. |

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| 41. | Rolling Hills | Rolling Hills is currently designated "Reserve Lands" and these lands were never realistically perceived by the community to be reserved for residential development. | The Official Plan states that the Reserve Lands designation applies to lands that form part of the City's long term land supply, but where there may currently be servicing, access, or other development related limitations that must be overcome prior to development. The Reserve Lands designation is intended to be reviewed through the Official Plan Update to ensure that the lands are placed in the appropriate land use designation. At this time, it is appropriate to place the lands within residential land use designations with provisions for office/commercial uses. |
| 42. | Rolling Hills | There is no reasonable justification in the City's report that Rolling Hills should accommodate 20% of the additional dwelling units allocated in the Built-Up Area of the City. | Under Growth Scenario 3, which looked at the redevelopment of the entirety of Rolling Hills, allowing for an increased intensification target of 55%, the number of units targeted for Rolling Hills represented approximately only 10% of the units allocated to the Built-Up Area. The Growth Management Strategy proposes only the redevelopment of the northern section of Rolling Hills, which is proposed to accommodate less than 5% of all of the units being allocated to the Built-Up Area. |
| 43. | Rolling Hills | In Scenario 3, the effect of reducing the residential capacity in the Clair-Maltby Secondary Plan area drives the assumption that Rolling Hills has sufficient capacity to accommodate growth. | The three scenarios for growth presented different options for how to accommodate growth across the City of Guelph to 2051. These three scenarios were developed using feedback received during rounds of consultation where we asked questions about how and |

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| | | | <p>where we should distribute growth in Guelph to achieve the targets and forecasts of A Place to Grow. Some of these responses included looking into higher rates of intensification, which was how Scenario 3 was developed. A Place to Grow requires that a minimum of 50% of future residential growth be allocated to the Built-Up Area and a maximum of 50% of future residential growth be allocated to the Designated Greenfield Area. Given that all three scenarios were striving to achieve the same forecast population of 203,000, under Scenario 3, where more growth is allocated to the Built-Up Area, an equal amount of residential growth must be redistributed from the Designated Greenfield Area to the Built-Up Area. Without redistributing this growth from the Designated Greenfield Area into the Built-Up Area, the result would be a population that would exceed 203,000 people.</p> <p>Note that with the recent proposed annexation of the Dolime quarry lands as a measure to protect the City's drinking water supply, the Growth Management Strategy will now be proposing to plan for a population of 208,000 people by 2051.</p> |
| 44. | Rolling Hills | The intensification of Rolling Hills inappropriately increases the overall gross residential density to a future 25.6 units per hectare in the neighbourhood. | The Growth Management Strategy is proposing a gross residential density of approximately 16 units per hectare in Rolling Hills to 2051. |

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| 45. | Rolling Hills | Growth Scenario 3 interferes with the stable Rolling Hills estate residential community. | The Growth Management Strategy is proposing to provide for a balance by allowing for intensification in the northern section of the neighbourhood, while also planning to allow portions of Rolling Hills to remain as estate residential lots. |
| 46. | Rolling Hills | Retaining the estate residential in Rolling Hills is a good example of achieving a mix of housing types in the City of Guelph. | A Place to Grow prioritizes intensification of existing developed areas within the Built-Up Area, and also directs municipalities to diversify their existing housing stock. Guelph's existing housing stock is predominantly single detached forms of housing. Through consultations on Shaping Guelph, we also heard overwhelmingly that we should not plan to grow beyond our existing boundaries to accommodate growth to 2051. In order to achieve the intensification and housing mix principles of A Place to Grow, while also continuing to grow to 2051 within our existing boundary, the Growth Management Strategy proposes to allow for portions of Rolling Hills to be redeveloped. The Growth Management Strategy proposes a Rolling Hills Estate Residential land use category to apply to portions of the area and proposes appropriate residential categories for the rest of the area. |

June 9, 2021

Via E-Mail

David Sunday
Direct +1 519 575 7513
david.sunday@gowlingwlg.com
File no. H215787

Natalie Goss, Stacey Laughlin, and Krista Walkey
Senior Policy Planners & General Manager
Planning & Building Services
Corporation of the City of Guelph
Guelph City Hall
1 Carden Street
Guelph, ON N1H 3A1

Mayor Guthrie, Members of Council and City Clerk
Corporation of the City of Guelph
Guelph City Hall
1 Carden Street
Guelph, ON N1H 3A1

Dear Mayor Guthrie, Members of Council, Ms. Goss, Ms. Laughlin, and Ms. Walkey:

**Re: City of Guelph - Official Plan Review 2020 to 2022
Guelph Growth Management Strategy
Families for Rolling Hills Group
Concerns with Proposed Urban Structure**

We are the lawyers for the group known as Families for Rolling Hills. Families for Rolling Hills is an association of homeowners within the Rolling Hills subdivision (Plan 732, registered July 3, 1986).

Rolling Hills is a unique area within the City's built-up area having been developed by Armel Corporation in the mid-1980s. At the time of development, the Rolling Hills lands comprised part of the Township of Puslinch. It has been a remarkably stable community. Today, Rolling Hills remains characterized by large rural residential estate type lots (typically between 2 to 4 acres) with private services, integrated within a sensitive natural environment comprising part of the Paris Moraine and which includes extensive wetlands and wooded areas. All lots within Rolling Hills are subject to registered restrictions (the "**Building Scheme**") in favour of other lots within the subdivision. The Building Scheme stipulates minimum dwelling sizes, restricts uses to residential uses, expressly prohibits business uses, and also expressly prohibits further subdivision of the lots.

At the April 21, 2021 Guelph Council meeting, City staff and its external consultants (Dillon Consulting Limited and Watson & Associates) presented a Proposed Urban Structure, which included a Strategic Growth Area along Clair Road from Dallen Drive to Victoria Road (the "**Proposed Clair Road Growth Area**"). The Proposed Clair Road Growth Area, which includes significant portions of the Rolling Hills area, envisions the area as a new Corridor for Mixed Use Development. In addition, we understand that

the City and its external consultants envision, as part of the Proposed Urban Structure, that the Rolling Hills area will accommodate much higher density development than today and that in excess of Six Thousand (6,000) new residents are proposed to be introduced into the Rolling Hills area (the “**Proposed Rolling Hills Intensification**”) through redevelopment.

Our clients are very concerned that the Proposed Urban Structure and the Proposed Rolling Hills Intensification both appear to contemplate the demolition and removal of the existing Rolling Hills development and its replacement with new higher density development. There is no justification for such a wholesale rejection of the existing Rolling Hills development. Rolling Hills is a stable residential community which provides a unique residential estate community within the City of Guelph. The Proposed Rolling Hills Intensification is neither wanted nor needed within this community.

Our clients object to the establishment of the proposed Clair Road Growth Area and the Proposed Rolling Hills Intensification for the following reasons:

1. Rolling Hills is a unique and sensitive area within the City’s built up area. Notwithstanding its inclusion within the built up area, the existing Rolling Hills community is comprised of large lot rural residential estate type development on private services.
2. The Proposed Clair Road Growth Area and the Proposed Rolling Hills Intensification is fundamentally incompatible with the existing Rolling Hills housing and the Building Scheme;
3. The Proposed Clair Road Growth Area is not interwoven into and does not have regard to the existing housing and sensitive natural areas within Rolling Hills;
4. It is premature and would be contrary to the Building Scheme to contemplate any part of the Rolling Hills area for intensification;
5. The Proposed Urban Structure is contrary to the Building Scheme and, by adopting a structure that assumes Rolling Hills will intensify, the City would be improperly incentivizing property owners to unlawfully violate the Building Scheme through redevelopment of their lots. The City will be inviting litigation within the Rolling Hills community; and
6. Planning for growth that is premised on the demolition and removal of an existing vibrant community is inappropriate and lacks any planning justification.

On behalf of our clients, we submit that no part of the Rolling Hills area should be contemplated for intensification. The City Proposed Urban Structure should show due regard for Rolling Hills existing built environment, the natural environment, the unique Rolling Hills landscape, as well as neighbourhood concerns. Furthermore, any planning for Rolling Hills must respect and acknowledge the Building Scheme and the valid legal interests and expectations thereby protected. Other areas of the City are better candidates and are much more appropriate for intensification than Rolling Hills.

We hereby request the City revise the proposed Urban Structure to remove the Proposed Clair Road Growth Area and to abandon the Proposed Rolling Hills Intensification. We further request that the City reject any Proposed Urban Structure that envisions and/or depends upon an intensification of the Rolling Hills area. Intensification of this area would be inappropriate and would constitute an intentional violation of the Building Scheme.

Should you have any further questions in regard to the foregoing, please do not hesitate to contact the undersigned.

Sincerely,

Gowling WLG (Canada) LLP



David Sunday

DS

cc Families for Rolling Hills

Mark L. Dorfman, Planner

June 2, 2021

Natalie Goss
Senior Policy Planner
Planning and Building Services
City of Guelph

Dear Ms. Goss,

RE: Recommendations for Guelph's Growth Management Strategy and Municipal Comprehensive Review

MHBC has been retained by Armel Corporation to provide input to the City of Guelph's Growth Management Strategy. We understand that the City is currently undertaking a comprehensive review of the Official Plan to conform with recent changes to Provincial legislation and policies.

We have reviewed the reports that the City has released to date and we participated in the Development Industry Stakeholder Roundtable meeting. My clients are very interested to be a part of this process. They have significant land holdings throughout the City and as long term developers with over 65 years of history in the City, they play a direct role in achievement of the City's growth management objectives. After having reviewed the technical reports prepared to date, I offer the following comments for your consideration in the next step of this process.

1. Growth Management Options

We have reviewed the growth management scenarios described in the Growth Scenario Planning Technical Brief. We note that the scenarios are similar and all take the approach of accommodating future growth within the existing urban area by increasing greenfield density and by shifting future housing demand to a much greater proportion of high density housing types.

The Technical Brief identifies that ground oriented housing (single detached, semi-detached and townhouse units) will make up only about 25% of the total residential units required to accommodate forecast population growth from 2022 to 2051. The remaining 75% of units will be higher density apartment units. This is a considerable change from the City's historical household growth by unit type. The report also notes that affordability of ground oriented housing has steadily decreased.

Given that there is very little ability to provide more ground oriented housing within the existing settlement boundary, the lack of supply will continue to drive prices for ground oriented housing higher.

The basis for the great shift in future housing demand that is described in the technical report is not clear. Altus Group has provided an analysis of the City's Growth Scenario Technical Brief and associated information which is described in the attached memo dated May 28, 2021. The memo notes that the City's analysis appears to be inconsistent with the estimate of housing market demand by Hemson Consulting in the June 2020 Technical Report which was the basis for the updated forecasts in Schedule 3 of the Growth Plan. Altus also notes that the City's analysis does not assess the demand and supply of housing by dwelling unit, as required by the Growth Plan and the Lands Needs Assessment Methodology.

The three scenarios provided in the Growth Scenario Technical Brief do not include a scenario that would reflect market demand for housing based on unit type. It is important to include such a scenario. Without it as a comparison, it is not clear what choices and trade-offs are required by the other scenarios in order to achieve the considerable change to housing demand preferences. Such an assessment would assist in determining whether the various factors to be considered have been properly balanced and reflect good planning. A scenario based on housing demand by unit type is not only important to assess the necessity of a settlement boundary expansion but it is also required by the Growth Plan and the Province's Land Needs Assessment Methodology as noted in the attached Altus memo.

2. Employment Lands

According to the Employment Lands Strategy study, the City of Guelph has enough employment lands to accommodate forecast growth. This assumes that approximately 45% of employment will occur on designated employment lands and that new employment development will occur at higher densities than has occurred previously.

In order to protect the traditional industrial lands identified as Provincially Significant Employment Zones (PSEZ) such that they can retain and attract the types of employment that require large land areas and/or have relatively low employment densities, the study notes that density of employment lands outside these areas will need to develop at relatively high densities. For example lands designated as Corporate Business Park are identified as achieving densities of 70 jobs per hectare.

Achievement of the Employment Land Strategy will require considerable change from recent development trends and the City should be considering a wider range of changes to the urban structure. This includes ensuring that smaller Corporate Business Park lands that are located in various parts of the City are maximized for redevelopment. For example, the Corporate Business Park lands on Speedvale Avenue provide opportunity for achievement of high densities along a potential

intensification corridor. Speedvale Avenue should be considered as a mixed use corridor and the land use policy and regulations revised to allow for a wider range of uses at a form that achieves a higher density of development.

Specifically, the Corporate Business Park designation applies to only a small portion of lands in the Speedvale Avenue corridor. We recommend that the City apply a mixed use corridor designation to these lands and the entirety of the south side of Speedvale Avenue west of Edinburgh Road. The mixed use designation should allow for the types of uses currently permitted within the Corporate Business Park designation but with a greater range of uses to facilitate intensification and redevelopment.

3. Designating additional Intensification Corridors

The Housing Analysis Strategy identifies that a significant amount of future growth will need to be accommodated through intensification. The Report further recommends that the City identify additional intensification corridors and develop a hierarchy of nodes and corridors.

The Growth Scenario Planning Technical Brief and the Housing Analysis Strategy report identify that, for a variety of reasons, not all land within designated intensification areas will redevelop within the planning period. The current Intensification Corridors designated in the existing official plan, therefore, do not contain sufficient lands to accommodate the amount of intensification required to achieve future growth given that not all lands will redevelop during the planning horizon. The Altus memo also notes that the City's assumptions regarding the capacity for areas outside of Intensification Areas to accommodate growth appear to be overstated. Therefore, the City should be considering additional Intensification Corridors to ensure there is sufficient opportunity to accommodate future growth within the planning period in locations that can be effectively serviced by multiple forms of transportation.

Service commercial designated lands such as those on Speedvale Avenue and Wellington Street are examples of corridors that should be considered for designation as intensification corridors. These lands have considerable potential for intensification given the existing built form and location. The Service Commercial designated lands along Speedvale Avenue west of Edinburgh Road are an opportunity for redevelopment and intensification given the relatively low density of existing development. Identification as a mixed use corridor and the broadening of the land uses would also provide an appropriate transition in land use and density from the mainly industrial uses on the north side of Speedvale Ave to the primarily low rise residential neighbourhoods to the south.

We recommend that the City include Speedvale Avenue and Wellington Street West as mixed use intensification corridors.

4. Maximize the intensification potential in Community Mixed Use Nodes

Community Mixed Use Nodes are already identified in the Official Plan as important components of the City's existing growth management strategy. Community Mixed Use Nodes provide significant opportunity for accommodating future growth. The Housing Analysis and Strategy report recommends that the City should identify and set growth targets for strategic growth areas. We support this recommendation.

The Community Mixed Use Nodes on the west side of Guelph (eg Elmira Paisley Node and Silver Creek Parkway Node) are strategic growth areas and provide considerable opportunity to accommodate residential and employment growth. It is important that the City not only look at the area within the "Node" but also the surrounding lands. There are a variety of land parcels within and near the Nodes, some of which are vacant, that are designated medium density. The City should consider greater density on these lands. There are limited opportunities for the City to accommodate the levels of intensification identified in the technical reports. The City needs to take advantage of intensification sites that are not yet developed and are in locations that would provide appropriate transition to existing low density neighbourhoods. The west side Community Mixed Use Nodes provide opportunity for accommodating considerable growth (at least 7,500 future pop) and also provide opportunities for development in concert with planned transit and potential future higher order transit. Comprehensive planning to these areas now also minimizes site specific applications in the future and better ensures compatibility with existing surrounding development.

More flexibility is needed in the commercial land use policies within the Nodes. The current policies and regulations work against achievement of mixed use and residential intensification in particular. Given the level of intensification needed to accommodate future growth, the City will have to be relatively aggressive in applying a permissive land use framework that will allow for and encourage considerable density (and height) in the Community Mixed Use Nodes and other places that are located such that the impacts of height and density on existing low rise neighbourhoods are minimized and the benefits of density, such as transit efficiency, are maximized. We recommend that potential growth management options fully explore the maximum potential of the Community Mixed Use Nodes.

5. Maximize intensification potential in Neighbourhood Commercial Centres

There are a number of neighbourhood commercial centres designated within City. The majority are within the designated Built Up Area. The current Official Plan identifies that Neighbourhood Commercial Centres are intended to provide the day to day service and shopping needs for surrounding residential areas. In some cases, this planned function is no longer occurring due to the changing nature and evolution of commercial activity. In a few cases, designated neighbourhood commercial centre sites remain vacant and may never develop as planned. For example, the Neighbourhood Commercial Centre designated site at the corner of Willow Road and Elmira Road is

vacant and unlikely to develop with commercial land uses given its proximity to the Community Mixed Use Centre a few blocks away at Paisley Road and Elmira Road.

In general, the neighbourhood commercial centres provide opportunity for accommodation of future population and employment growth. We recommend that through the Growth Management Strategy, the City should evaluate and consider these sites for a wider range of uses including residential and other employment uses and allow for greater height and density than what is currently permitted.

6. Servicing and Infrastructure Capacity

The City has noted that a number of servicing studies are underway. It is important that these studies are completed before the City determines a preferred growth option. At this point it is not clear if there are servicing constraints that would limit the achievement of greater density in areas that the City has identified.

7. Process and Next Steps

As noted above, the City's growth management strategy is an important input to the update of the Official Plan. Armel has considerable landholdings in the City and will play a role in implementing the City's growth management strategy in any form that it should take. We ask that the City continue to consult with members of the development industry as part of the next steps in the process.

In conclusion, we acknowledge that the City has undertaken considerable work and the information provided to date is informative and helpful. We kindly ask that you consider these comments and recommendations in preparation of the next steps of the City's growth management strategy and official plan review. We would also welcome the opportunity to discuss with you the comments in this memo and those in the attached Altus memo in more detail and we are available for a video conference call with you and your team at a time of your convenience.

Yours truly,

MHBC

A handwritten signature in dark ink, appearing to read "Dan Currie". The signature is fluid and cursive, with the first name "Dan" being more prominent than the last name "Currie".

Dan Currie, MA, MCIP, RPP
Partner

cc. Mandy Scully, Armel Corp.
Chris Corosky, Armel Corp.
Daryl Keleher, Altus Group
Susan Rosenthal, Davies Howe

June 2, 2021

Memorandum to: Mandy Scully
Armel Corporation

From: Daryl Keleher
Altus Group Economic Consulting

Subject: Guelph OP Review – Implications of Growth Scenarios
Our File: P-6656

Altus Group Economic Consulting was retained by Armel Corporation to review the City of Guelph's land needs assessment, including the housing forecasts, estimates of housing supply and housing development potential, as well as the inputs, assumptions and methodology used to establish the need for an urban boundary expansion to accommodate population and employment growth to 2051.

Our preliminary findings are summarized below:

City's Housing Forecast Falls Short of Meeting Demand for Ground-Related Housing

- There are significant differences between the forecasted housing market demand with the housing mix in the City's GMS with significant shortfalls in ground-related housing (singles, semis, rows) relative to demand.
- The lack of ground-related housing being included in the City's plans would have significant implications for the City's ability to attract a young, qualified labour force, and may push young families, who have been responsible for a significant share of the City's population growth, to other nearby municipalities where their desired housing is more likely to be available;

Concerns with Estimated Housing Supply and Intensification Potential

- Additional detail is required to understand what is included and excluded from the City's supply of existing designated greenfield areas;
- The City appears to be over estimating the intensification potential in parts of the City outside of its key intensification areas. Assuming 100% build-out of all unit potential in the City's Downtown, its Community Mixed-Use Nodes and Intensification Corridors, the City is requiring roughly one-third of all intensification units to be in other parts of the City's existing communities, the potential of which is likely overstated;

City's Housing Forecast Overemphasizes Ability of Accessory Apartments to Meet Housing Demand

- A significant proportion of new housing projected to be built in the City to 2051 is in 'accessory apartments', which the City is basing future projections of on recent historic trends.
- The City's forecast share of accessory apartments (11%) is roughly 5-7 times higher than the shares assumed by nearby municipalities of Halton Region and the City of Hamilton (1.4% to 2.5%),

- The City's reliance on these accessory apartment units to meet forecasted housing demand ignores both that:
 - A significant proportion of the demand for these units historically has come from students responding to no new on-campus housing being constructed at the University over the past 20 years, despite enrolment increasing by 92% over that same period;
 - Where these units in the future will be occupied by students, these persons do not count towards the achievement of the City's population forecasts – rather, the demand for these units by out-of-town students, and other non-permanent residents should be added to the quantum of the City's overall housing demand;
 - By relying on these accessory units, the extent of the need for additional urban land is likely underestimated.

Additional analysis regarding the above points are provided in the detailed subsections of this memorandum below.

COMMENTARY ON HOUSING FORECASTS

Difference in Housing Forecast vs Estimated Housing Demand

Figure 1 shows how the housing forecasts used in the City's Growth Management Study (GMS) differs from the estimate of housing market demand by Hemson Consulting in the June 2020 Technical Report, which was used as the basis for the forecasts in Schedule 3 of the Growth Plan. The City's GMS housing forecasts would see shortfalls of ground-related housing relative to estimated market demand ranging from 6,180 to 8,730 ground-related units.

Figure 1

Comparison of Housing Demand Estimate for City of Guelph with Housing Forecasts in Shaping Guelph Study

| | Ground-Related | Apartments <i>Units</i> | Total | Ground-Related | Apartments <i>Percent</i> | Total |
|--|----------------|----------------------------|--------|----------------|------------------------------|--------|
| Hemson GGH Technical Report (2016-2051) | 19,000 | 12,000 | 31,000 | 61.3% | 38.7% | 100.0% |
| Guelph GMS (2016-2051) | | | | | | |
| Scenario 1 | 10,270 | 20,925 | 31,195 | 32.9% | 67.1% | 100.0% |
| Scenario 2 | 11,715 | 19,480 | 31,195 | 37.6% | 62.4% | 100.0% |
| Scenario 3 | 12,820 | 18,375 | 31,195 | 41.1% | 58.9% | 100.0% |
| Differences Between Demand and GMS - Surplus/(Shortage) | | | | | | |
| Scenario 1 | (8,730) | 8,925 | 195 | | | |
| Scenario 2 | (7,285) | 7,480 | 195 | | | |
| Scenario 3 | (6,180) | 6,375 | 195 | | | |

Source: Hemson GGH Technical Report, June 2020, City of Guelph, Growth Scenario Planning - Shaping Guelph, Growth Management Strategy, (March 2021)

There are numerous implications of the City's housing forecasts deviating so significantly from the recent forecasted housing market demand, including planning for lower population than Schedule 3 of the

Growth Plan requires, relying on increased mobility of senior households to ‘free-up’ ground-related housing supply as a means to address the shortfall in planned supply of singles, semis and rows, reducing housing options for young families, and expecting households to increasingly choose larger apartment units that are less desirable from a market perspective than dense ground-related housing forms such as townhouses.

The mechanisms and assumptions being relied upon by the City to make-up for the relative lack of ground-related housing compared to market demand, such as expecting seniors to be less likely to desire aging-in-place, expecting young families to increasingly choose apartments over ground-related housing, do not take into account many of the reasons why the counter-vailing trends have persisted in the City and elsewhere in the Province for some time.

Different Unit Mixes in the City’s Growth Scenarios Are Unlikely to Generate Forecasted Population

The three growth scenarios are based on 31,195 new housing units, of differing unit mixes, producing the same 66,700 net population growth over the 2016-2051 period. However, when the average household size assumptions for future units (otherwise known as persons per unit / PPU factors), as forecast in the City’s 2018 Development Charges Background Study, are applied to the unit mixes from each of the three growth scenarios, Scenario 1 and Scenario 2 each result in substantial shortfalls in projected population growth relative to forecast, of approximately 3,500 persons and 2,220 persons, respectively.

Figure 2

Population Generation by Growth Scenario, City of Guelph, 2016-2051

| | Low - Density | Medium- Density | High- Density | Accessory Apartments | Total |
|---|------------------|--------------------|--|---------------------------------------|-------------------|
| Housing by Scenario | | | <i>Units</i> | | |
| Scenario 1 | 3,270 | 7,000 | 17,570 | 3,355 | 31,195 |
| Scenario 2 | 3,475 | 8,240 | 16,125 | 3,355 | 31,195 |
| Scenario 3 | 4,420 | 8,400 | 15,020 | 3,355 | 31,195 |
| | | | Persons per Unit | | |
| Persons per Unit Factors | 3.332 | 2.455 | 1.677 | 1.677 | |
| Population Generated by Scenario | | | <i>Persons</i> | | |
| Scenario 1 | 10,896 | 17,185 | 29,465 | 5,626 | 63,172 |
| Scenario 2 | 11,579 | 20,229 | 27,042 | 5,626 | 64,476 |
| Scenario 3 | 14,727 | 20,622 | 25,189 | 5,626 | 66,164 |
| Total Growth Forecast | | | | | 66,700 |
| | | | Additional Units Required | Average Household Size | Population |
| Estimated Shortfall by Scenario | | | <i>Units</i> | <i>Persons / Unit</i> | <i>Persons</i> |
| Scenario 1 | | | 1,742 | 2.03 | (3,528) |
| Scenario 2 | | | 1,076 | 2.07 | (2,224) |
| Scenario 3 | | | 253 | 2.12 | (536) |

Source: Altus Group Economic Consulting based on City of Guelph Shaping Guelph (April 9, 2021), City of Guelph 2018 Development Charges Background Study

If the City is to continue the evaluation of the three growth scenarios, additional housing units will be required to offset the increased emphasis on medium and high-density housing forms compared to estimated housing market demand and still achieve the population forecast allocated to the City. Based on our estimates, and average household sizes within the three growth scenarios, to correct for this issue alone (and in isolation from other issues raised here), between 250 and 1,740 additional housing units need to be incorporated into the City's housing forecasts to meet the City's growth forecasts to 2051.

Relying on Mobility of Aging Households is Unlikely to Address Shortfall in Forecast Housing Demand of Young Families

The housing forecasts used in the three growth scenarios all present a significant deviation from the City's estimated housing market demand in the August 2020 Technical Report prepared by Hemson Consulting, which was used as the basis for the 2051 population forecasts in the 2020 Growth Plan.

The significant shortfall in ground-related housing forms (singles, semis, rows) equates to between 5,980 units (Scenario 3) and 8,530 units (Scenario 1), which is offset by a surplus of high-density and accessory apartments ranging from 4,275 units (Scenario 3) to 6,825 units (Scenario 1).

If the City is to meet housing demand as estimated by Hemson Consulting, the implication is that seniors currently occupying ground-related housing will vacate their homes, freeing up that housing stock for young families, and will either a) move to an apartment unit within the City, or b) move to a unit outside of the City.

If the anticipated moving of senior households out of ground-related housing does not materialize to the degree implied (5,980 to 8,530 units to 2051), this will mean that families seeking ground-related housing will be forced to locate in another municipality or pay increased housing prices for ground-related housing in the City to secure their desired housing form. If ground-related housing supply falls short of demand for ground-related housing, it will put upward pressure on prices for those ground-related homes that are available in the City.

Figure 3 Shortfall / Surplus Relative to Estimated Housing Market Demand, by Growth Scenario, City of Guelph, 2016-2051

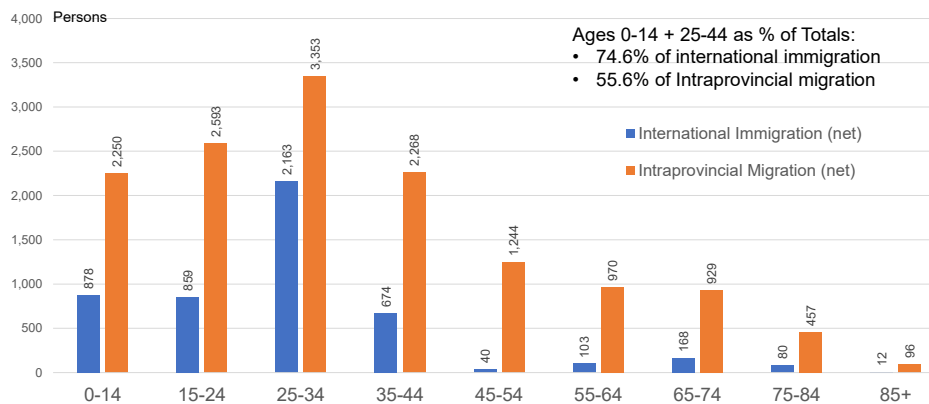
| | Low - Density | Medium- Density | High- Density | Accessory Apartments | Total |
|--|------------------|--------------------|------------------|-------------------------|------------|
| Housing by Scenario | | | | | |
| | | | <i>Units</i> | | |
| Scenario 1 | 3,270 | 7,000 | 17,570 | 3,355 | 31,195 |
| Scenario 2 | 3,475 | 8,240 | 16,125 | 3,355 | 31,195 |
| Scenario 3 | 4,420 | 8,400 | 15,020 | 3,355 | 31,195 |
| Housing Market Demand | 10,200 | 8,600 | 12,900 | 1,200 | 32,900 |
| Surplus / (Shortfall) by Scenario | | | | | |
| Scenario 1 | (6,930) | (1,600) | 4,670 | 2,155 | |
| Scenario 2 | (6,725) | (360) | 3,225 | 2,155 | |
| Scenario 3 | (5,780) | (200) | 2,120 | 2,155 | |

Source: Altus Group Economic Consulting based on City of Guelph Shaping Guelph (April 9, 2021), Hemson Technical Report, (August 26, 2020)

Over the past 10 years, nearly 75% of net international immigration and 56% of Intraprovincial migration to the Wellington County/Guelph area has been from the 0-14 and 25-44 age groups, showing that the primary source of population growth and influx of labour force talent into the City from other parts of the world and Ontario are new and young families.

Based on the significant disconnect between the housing market demand in the City and the housing forecasts in the City's growth scenarios, it is likely that a significant proportion of prospective newcomers to the City will find apartment units or accessory apartments unsuitable for their needs and will instead find desired housing forms that suit their budget and lifestyle in municipalities outside the City.

Figure 4 **Net International Migration and Intraprovincial Migration to Wellington County by Age Group, 2010-2019**

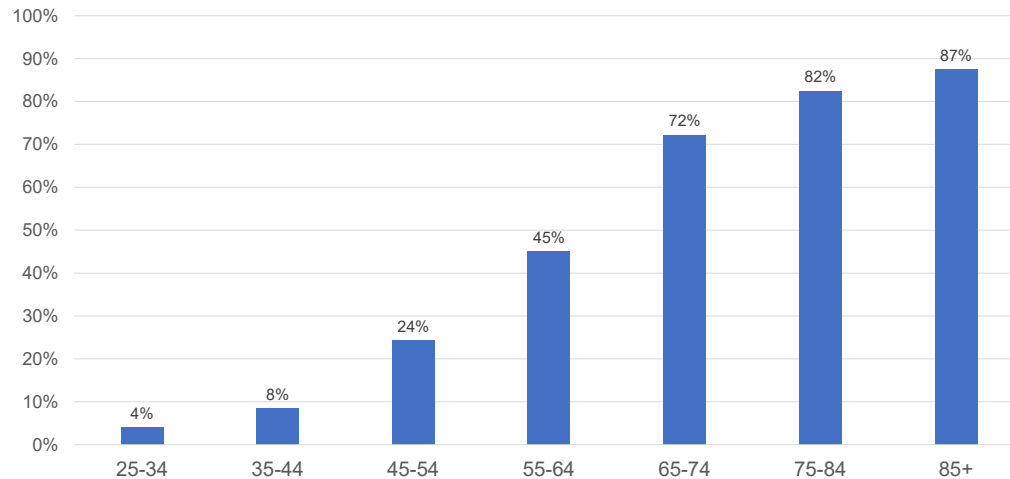


Source: Statistics Canada

There is often little financial incentive for older households to move from their family home – according to the 2016 Census, the share of owner-occupied housing units that have mortgages declines significantly for households older than 65 years of age. Over 80% of households with persons aged 75+ have no mortgage on their property. This implies that there is typically little financial motivation for older households to leave their family homes earlier than desired, as in most cases, beyond ongoing maintenance costs and annual property taxes, the costs of owning a property decline as households exit their income-earning years.

Figure 5

Share of Owner-Occupied Households without Mortgage Payments, City of Guelph, 2016

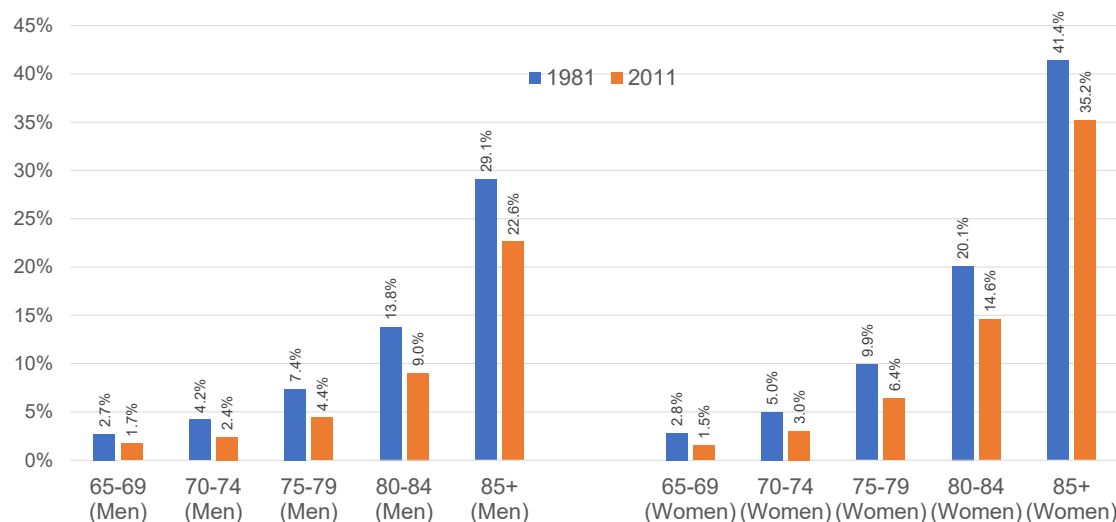


Source: Statistics Canada, 2016 Census

Compared to 1981, as of 2011 the share of seniors living in collective dwellings has fallen significantly, for every age group of seniors. It is increasingly unlikely for seniors to vacate their family homes for collective dwellings such as senior residences, nursing homes, long-term care, special care facilities, etc. The expectation that seniors will increasingly choose to vacate their homes to 'make room' for younger households seeking ground-related housing is not grounded in recent trends seen in the choices being made by older households.

Figure 6

Share of Persons by Age Group Living in Collective Dwellings, Canada, 1981 & 2011



Source: Statistics Canada, Census of Population, 1981 and 2011

Large Apartment Units are Not a Suitable Substitute for Many Families

Based on data from Altus Group on prices and sizes of actively marketed units within the City, a typical 2-bedroom apartment ranges from \$529,400 to \$580,500, and would provide 1,080 to 1,200 sf of space, while a typical townhouse unit being sold in the City is priced at approximately \$615,100, and in many cases would have three bedrooms within the unit, and would provide an average of over 1,600 sf of space. It is unlikely that many young families will choose a equally priced, but smaller condominium apartment unit over a larger ground-related townhouse.

Figure 7

Average Unit Size and Selling Price, Actively Marketed Developments, City of Guelph

| | Apartment | |
|-------------------------------|-------------------|-----------------------|
| | Average Unit Size | Average Selling Price |
| Condominium Apartments | <i>Sq. Ft.</i> | <i>\$ / Sq. Ft.</i> |
| 1 Bedroom | 690 | 336,000 |
| 1 Bedroom + Den | 764 | 372,000 |
| 2 Bedroom | 1,087 | 529,400 |
| 2 Bedroom + Den | 1,192 | 580,500 |
| 3 Bedroom & Up | 1,264 | 615,600 |
| Townhouses | 1,616 | 615,140 |

Source: Altus RealNet

How Much Low-Density Housing is Already Approved?

Based on the total housing forecast over the 2016-2051 period, and the existing supply of housing units on existing designated greenfield lands, the three growth scenarios presented by the City add just 3,872 to 4,452 additional low-density and medium-density units in the DGA over the 2016-2051 period, which equates to just 111 to 127 units per year of additional low-density and medium-density units in the City's DGA.

This means that the City's 30-year housing forecast and land needs exercise is only roughly doubling the supply of low- and medium-density units DGA areas. If the market demand for low- and medium-density housing is not met, the housing that is available within the City (existing and new homes) will be subject to increased competition and the City's existing and new supply of low- and medium-density housing will become even less and less affordable over time.

Figure 8 Additional Low- and Medium-Density Housing Forecast Over and Above Existing Supply, Guelph 2016-2051

| | Low - Density | Medium- Density | Total Low & Medium- Density |
|---------------------------------------|------------------|--------------------|-----------------------------------|
| Housing by Scenario | | <i>Units</i> | |
| Scenario 1 | 3,270 | 7,000 | 10,270 |
| Scenario 2 | 3,475 | 8,240 | 11,715 |
| Scenario 3 | 4,420 | 8,400 | 12,820 |
| DGA Housing by Scenario | | | |
| Scenario 1 | 2,895 | 5,390 | 8,285 |
| Scenario 2 | 2,895 | 5,390 | 8,285 |
| Scenario 3 | 3,320 | 5,545 | 8,865 |
| Existing DGA Supply | | | |
| Short-Term Supply | 451 | 318 | 769 |
| Designated Supply | 902 | 2,742 | 3,644 |
| Total | 1,353 | 3,060 | 4,413 |
| Net New DGA Supply by Scenario | | | |
| Scenario 1 | 1,542 | 2,330 | 3,872 |
| Scenario 2 | 1,542 | 2,330 | 3,872 |
| Scenario 3 | 1,967 | 2,485 | 4,452 |

Source: Altus Group Economic Consulting based on City of Guelph Shaping Guelph (April 9, 2021), Growth Management and Affordable Housing Monitoring Report, 2020

ACCESSORY APARTMENTS

11% of City's Housing Forecast Is in Accessory Apartments

Each growth scenario projects a total of 3,355 accessory apartments, which equates to roughly 11% of the 31,195 net new housing units to be constructed in the City between 2016 and 2051. According to the April 9 Staff Report from the City, accessory apartments are defined as follows:

Accessory apartments (accessory dwelling unit) is a dwelling unit that is self-contained, subordinate to and located within the same building or on the same lot as a primary dwelling unit. These are often referred to as secondary dwelling units, granny flats, or basement apartments with separate kitchen areas.

Of the 3,355 accessory apartments in the City's housing forecast, 2,670 of these are planned to be located within the existing built-up area (BUA), and the remaining 685 will be planned to be located within the designated greenfield area (DGA).

City's Forecast Share of Accessory Apartments is 5-7 Times Higher Than Forecasts of Surrounding Municipalities

By comparison, other municipalities undertaking their LNA exercises are forecasting significantly lower proportions of new housing in the form of accessory apartments. The City of Hamilton is forecasting just

2,760 accessory apartments (2.4% of all new housing forecast), while Halton Region is forecasting 2,400 accessory apartments (1.4% of all new housing forecast), well below the City of Guelph's rate of 10.8%. Similar to the City of Guelph, the City of Hamilton also has a significant student population, but there have been numerous student residence buildings constructed in that City¹ that appears to mitigate the need for relying on accessory apartments throughout the City.

Figure 9 Comparison of Proportion of Housing Unit Forecast as Accessory Apartments, City of Guelph

| Municipality | Housing Forecast | | |
|------------------|---------------------|----------------------|------------------------------------|
| | Total Housing Units | Accessory Apartments | Accessory Apartments as % of Total |
| | Units | Units | Percent |
| City of Guelph | 31,195 | 3,355 | 10.8% |
| City of Hamilton | 110,320 | 2,760 | 2.5% |
| Halton Region | 173,500 | 2,400 | 1.4% |

Source: City of Guelph Shaping Guelph Growth Scenarios (April 9, 2021), Halton Integrated Growth Management Strategy Growth Concepts Discussion Paper (February 2021), City of Hamilton Land Needs Assessment to 2051 (December 2020)

The 3,355 accessory apartments amount to an annual average of approximately 96 accessory apartments per year. While the City has averaged 147 accessory apartment building permits per year over the 2008-2020 period (or 1,122 in total), basing a forecast of future accessory apartment completions on historic trends is problematic for two key reasons – 1) the supply of units within which accessory apartments can be incorporated is not limitless, but fixed, and each year the number of opportunities dwindles, and 2) much of the demand for accessory apartments was driven by the lack of new on-campus student housing.

Additionally, to the extent accessory apartments are occupied by students, as the Census does not count these persons towards the City's population, a significant proportion of future accessory units will not satisfy demand for population growth in the City. It is also unlikely that accessory apartment units would be a suitable substitute for the housing that most young families would be seeking. According to research undertaken by CMHC, in the City of Guelph, 74% of secondary dwelling units are basement apartments, with the average floor of basement apartments being 771 square feet.²

Forecast Being Based on Historic Trends Ignores Finite Supply of Opportunities for Accessory Apartments

According to research undertaken by CMHC into secondary dwelling units, as of 2019, roughly 9.2% of the City's ground-oriented housing units had secondary units, behind only the City of Toronto (15.4%) and the City of Brampton (9.6%) among Ontario municipalities. The forecasted growth of 3,335 accessory

¹ Les Prince Hall was constructed in 2006, and had 389 beds, and the Peter George Centre for Living and Learning was opened in 2019, and includes a 500-bed residence.

² CMHC, <https://www.cmhc-schl.gc.ca/en/media-newsroom/news-releases/2021/secondary-housing-units-across-city-toronto>

units and 10,270 low- and medium-density units to 2051 would mean that by 2051 roughly 14.5% of the City's ground-oriented dwellings would have a secondary dwelling unit (or just over 1 in 7 units), with the amount of growth estimated (3,335 units) more than doubling the current number of accessory units in the City.

Figure 10 **Estimates of Current and Future Accessory Apartment Units as Share of Ground-Oriented Housing, City of Guelph**

| | City (Current) | Growth (Sc. 1) | Total |
|--|-------------------|---------------------|--------|
| Estimated Number of Secondary Units | 3,206 | 3,335 | 6,541 |
| Estimated Percentage of Ground-Oriented Properties with Secondary Unit | 9.2% | | 14.5% |
| Total Ground-Oriented Units | 34,848 | 10,270 ¹ | 45,118 |

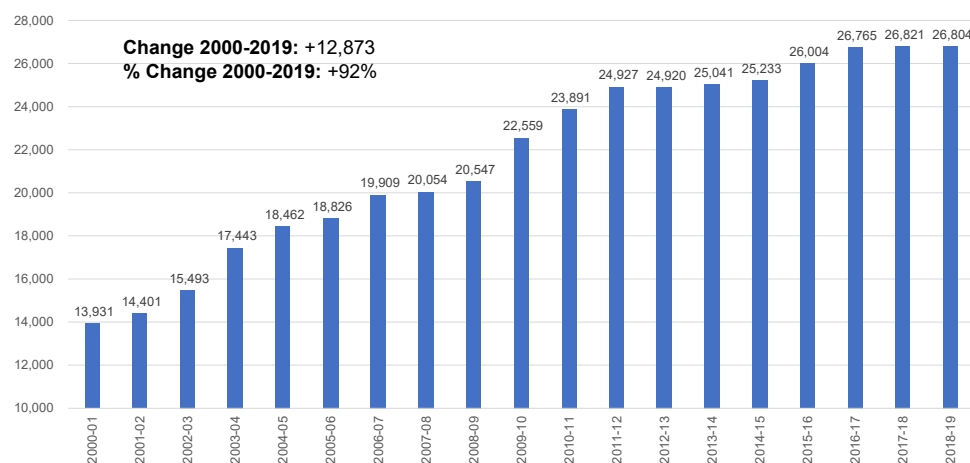
¹ Based on total forecasted low -density (3,270) and medium-density (7,000) units in Growth Scenario 1

Source: City of Guelph OP Review , Growth Scenario Planning Technical Brief, CMHC

City's Forecast of Accessory Apartments Ignore Student-Based Demand, Which Does Not Contribute to Achievement of Population Forecasts

Full-time enrolment at the University of Guelph ("the University") has increased substantially over the past 20 years, with overall enrolment among full-time students increasing by 92% since 2000, or an increase of 12,873 students, most of which would be associated with the main campus in Guelph (in recent years, roughly 82% of full-time students were based on the main Guelph campus).

Figure 11 **Historic Full-Time Enrolment, University of Guelph, 2000-2019**



Source: Ministry of Colleges and Universities, Common University Data Ontario

There Has Been No New On-Campus Housing Built Since 2001, Forcing Increased Student Demand Off-Campus

Despite the significant growth in enrolment at the University, there has been no new on-campus residence beds made available – there have been no new on-campus housing built since 2001, which has placed increased emphasis on off-campus housing, such as private student housing, but also accessory apartments throughout the City.

Figure 12 **Inventory of Student Residences, University of Guelph**

| Building(s) | Year Opened | Capacity Beds |
|---------------------------|----------------|------------------|
| | | |
| East Village | 2001 | 651 |
| 78 College Avenue | 1993 | 200 |
| East Residence | 1973 | 611 |
| Wellington Woods (family) | 1972 | 139 |
| Lennox-Addington Hall | 1971 | 574 |
| South Residence | 1969 | 1,821 |
| Lambton Hall | 1967 | 425 |
| Johnston Hall | 1932 | 320 |
| Watson Hall | 1931 | 51 |
| Mills Hall | 1921 | 195 |
| Maids Hall | 1913 | 50 |
| Macdonald Hall | 1904 | 149 |
| University Houses | misc. | 39 |
| Total | | 5,225 |

Source: University of Guelph

Part of the reason why accessory apartments in the City have seen substantial unit growth over the past 20 years is that there has been considerable demand for student housing that has not been met on-campus, with the growing gap between enrolment and on-campus housing made up by the private student housing developments and accessory apartments. As the previously unmet demand is fulfilled, it is likely that the recent pace of accessory apartment unit growth will slow.

In addition, the housing units throughout the City that are occupied by students do not count towards population growth that the City's GMS is seeking to accommodate – instead the growth in students and their housing needs should be accounted for over and above the housing needed to accommodate the City's forecasted population growth.

ANALYSIS OF INTENSIFICATION ASSUMPTIONS

Growth Capacity within City's Built-Up Area Appears Overstated

The City's Housing Analysis and Strategy report estimates that 70% of the capacity for residential growth within the City's built-up area is in areas outside of the Downtown Urban Growth Centre, Community Mixed-Use Nodes and Intensification Corridors, and instead is in the "rest of the built-up area" and accessory units within existing dwellings/lots.

The City's intensification areas have a capacity of just 10,606 units, so even under a liberal assumption that 100% of the potential units in the Downtown, Community Mixed-Use Nodes and Intensification Corridors are constructed by 2051, it would still require 5,000 to 6,250 units built in other areas of the City, which may be challenging to achieve if these sites are in areas without the transit, amenities or other features that the City's primary intensification areas have.

Figure 13

Estimated Capacity for Growth within City of Guelph Built-Up Area (BUA)

| | Residential Unit Capacity | Population Capacity |
|--|------------------------------|------------------------|
| | <i>Units</i> | <i>Persons</i> |
| Capacity within City BUA by Location | | |
| Downtown UGC | 5,108 | 11,740 |
| Community Mixed-Use Nodes (MUN) | 2,180 | 5,010 |
| Intensification Corridors (IC) | 3,318 | 7,625 |
| Rest of Built-Up Area | 22,822 | 52,445 |
| Additional Residential Dwelling Units | 1,575 | 3,620 |
| Total | 35,003 | 80,440 |
| Built-Up Area Units by Scenario | | |
| Scenario 1 | 15,620 | |
| Scenario 2 | 15,620 | |
| Scenario 3 | 16,865 | |
| Capacity in UGC, MUN, IC | 10,606 | |
| Required Development in Rest of BUA by Scenario | | |
| Scenario 1 | 5,014 | |
| Scenario 2 | 5,014 | |
| Scenario 3 | 6,259 | |

Source: Altus Group Economic Consulting based on City of Guelph Housing Analysis and Strategy

While some explanation is provided in Appendix A to the Housing Analysis and Strategy Report, the estimated capacity of 22,822 dwelling units within the Rest of the BUA is based on curious assumptions that would appear to significantly overstate the amount of intensification potential:

- Including 'unused' density on 'underutilized' lots that are not currently at the maximum permitted residential floor space index (density) or lot coverage – it is unclear whether this 'maximum permitted' FSI used is inclusive of permitted height or density allowable through density bonusing, or if this represents base density permissions only;
- Lots with commercial land uses that permit residential, despite the City's report also stating that "it is important that all commercial lands within the City maintain a commercial function", which even if residential uses are allowed, any requirement to maintain and/or replace commercial floor space may hinder the feasibility of new residential development;
- Inclusion of 'reserve lands' that are expected to accommodate urban uses, but have servicing or access constraints, or "where additional land use planning is required to determine appropriate land uses";

- Inclusion of lots with frontage on an arterial or collector road, which may run counter to the City's stated objective to intensify other significant corridors in the City – it is unclear whether these units would overlap with the 3,318 units of intensification potential along the identified Intensification Corridors. We would seek information from the City to confirm whether these units of intensification potential are double counted;
- A secondary consideration, based on the lots identified through above listed criteria (among others), was whether the identified sites had a residential building constructed since 2015 – with those recently seeing construction not considered as an opportunity for residential intensification. However, the City's GMS states that "sites on which a residential building was constructed between 2005 and 2014 remained as an opportunity for residential intensification" although at a lower priority level than less recently developed sites. At a minimum, the City should discount the potential for redevelopment on lots with residential units constructed since 2005 (and likely significantly further back than that) in estimating intensification potential within the City's built-up area.

The list of criteria and details regarding the evaluation framework do not appear to have considered the 'net' amount of dwelling units on potential intensification sites, if a new intensification development project would require existing dwelling units to be demolished.

Pace of Apartment Growth Needs to Continue Recent Historic Highs for Next 30 Years

The City's growth scenarios include apartment forecasts ranging from 18,375 units to 20,925 units over the 2016-2051 period, requiring an annual pace of 525 to 598 units per year.

The pace of growth in apartments in recent years in the City has been 512 units per year, meaning that even at the low-end of the forecasted range of annual apartment units, the City would need to replicate the trends seen in the past five years for every year to 2051.

Rather than comparing future growth to the City's recent increased apartment development activity, when the future apartment unit forecasts are compared to longer stretches of historic apartment development, the pace of growth assumed for the City appears less and less likely to continue for the entire 30-year period going forward, as in many cases the amount of apartment development required over the next 30 years would need to double or triple the longer-term trends in apartment construction in the City.

Figure 14

| | Pace of Annual Apartment Growth by Scenario Compared to Historic Rates | | |
|---|---|--------------------------|--------------------------|
| | Growth Scenario 1 | Growth Scenario 2 | Growth Scenario 3 |
| Compared to Past Five Years (512 units/yr) | +2% | +9% | +17% |
| Compared to Past 10 Years (395 units/yr) | +33% | +41% | +51% |

| | | | |
|---|-------|-------|-------|
| Compared to Past 15 Years (308 units/yr) | +70% | +80% | +94% |
| Compared to Past 20 Years (254 units/yr) | +106% | +119% | +135% |
| Compared to Past 25 Years (217 units/yr) | +142% | +157% | +176% |
| Compared to Past 30 Years (203 units/yr) | +159% | +175% | +195% |

COMMENTS RE: LAND NEEDS METHODOLOGY

Land Needs Analysis Does Not Compare Demand by Unit Type with Supply by Unit Type

The City's GMS, when estimating land needs, takes the amount of population to be accommodated in the DGA, adds the community land jobs, and divides the total number of persons and jobs to be accommodated by the assumed DGA density to estimate the number of hectares needed. This estimated land need is compared with the number of hectares of designated greenfield area to assess whether there is sufficient available land in the DGA.

However, the LNAM requires that the City assess whether the housing supply by unit type is sufficient or not to accommodate housing demand by unit type. When the housing forecasts are compared to housing supply by unit type, there is a deficiency of housing of all types within the City's housing supply.

Figure 15 Comparison of Housing Forecasts in City of Guelph GMS, with Housing Supply by Unit Type

| | Low - Density | Medium- Density | High- Density | Accessory Apts | Total |
|----------------------|------------------|--------------------|------------------|-------------------|----------|
| Scenario 1 | | | <i>Units</i> | | |
| Housing Forecast | 3,270 | 7,000 | 17,570 | 3,355 | 31,195 |
| Total Supply | 1,581 | 4,348 | 8,796 | n.a. | 14,725 |
| Surplus / (Shortage) | (1,689) | (2,652) | (8,774) | | (13,115) |
| Scenario 2 | | | | | |
| Housing Forecast | 3,475 | 8,240 | 16,125 | 3,355 | 31,195 |
| Total Supply | 1,581 | 4,348 | 8,796 | n.a. | 14,725 |
| Surplus / (Shortage) | (1,894) | (3,892) | (7,329) | | (13,115) |
| Scenario 3 | | | | | |
| Housing Forecast | 4,420 | 8,400 | 15,020 | 3,355 | 31,195 |
| Total Supply | 1,581 | 4,348 | 8,796 | n.a. | 14,725 |
| Surplus / (Shortage) | (2,839) | (4,052) | (6,224) | | (13,115) |

Source: City of Guelph, Growth Scenario Planning - Shaping Guelph, Growth Management Strategy, (March 2021), City of Guelph Growth Management and Affordable Housing Monitoring Report 2020 (April 9, 2021)

Potential Need for Deductions to Existing DGA Land Area

Policy 2.2.7.3 of the Growth Plan states that the minimum density target will be measured over the entire DGA, but with some exclusions (as listed below). It is unclear whether the 975 hectares of existing DGA land area include any of the following required exclusions:

- Natural heritage features and areas;
- Natural heritage systems and floodplains;
- Electricity transmission lines & associated rights-of-way;
- Energy transmission pipelines & associated rights-of-way;
- Freeways;
- Railways;
- Employment Areas; and
- Cemeteries.

We would request that the City make a full and complete inventory of existing housing developments in the development pipeline, as well as mapping of designated greenfield lands with gross and net land areas identified.

Growth Plan Requires Minimum Intensification and Density Targets be Used in the MCR and Land Needs Assessment

Policy 2.2.8.2 of the Growth Plan states that:

2. A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:

*a) based on the **minimum intensification and density targets** in this Plan and a **land needs assessment** undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area. ...*

According to policy 2.2.7.2 of the Growth Plan, the minimum density target applicable to the DGA of the City of Guelph is 50 residents and jobs per hectare. This minimum density is what should be used to establish whether there are needs for additional land in the settlement area. The City uses the minimum intensification target of 50%, but is not using the minimum DGA density target in the land needs calculations.

Policy 2.2.1.5 of the Growth Plan states that:

5. The Minister will establish a methodology for assessing land needs to implement this Plan, including relevant assumptions and other direction as required. This methodology will be used by upper- and single-tier municipalities to assess the quantity of land required to accommodate forecasted growth to the horizon of this Plan

The Guelph GMS uses DGA densities of 64 and 66 persons & jobs per hectare to estimate whether additional DGA land is required. However, if the Growth Plan policy was met requiring that minimum density targets were used in the assessment of land needs under the City's MCR, it is apparent that the City has a substantial shortage of DGA land. Using the approach to calculating DGA land needs in the City presented in the Shaping Guelph report with the minimum density of 50 persons and jobs per hectare instead of 66 persons and jobs per hectare, instead of a small surplus of land, the City has a 250-hectare shortage.

If the City were to complete their assessment using the minimum density targets as required by the Growth Plan, it is apparent that there is a need for additional urban land in the City to allow for the achievement of forecasted population growth to 2051.

Figure 16

Calculated DGA Land Needs to 2051, City of Guelph GMS

| | Scenario 1 & 2 - Guelph GMS | Scenario 1 & 2 - at Minimum DGA Density, Growth Plan |
|--|--------------------------------|---|
| <i>Persons</i> | | |
| Population | 52,520 | 52,520 |
| Deduct - Pop'n in Accessory Apartments | 660 | 660 |
| Equals: Adjusted Population | 51,860 | 51,860 |
| <i>Jobs</i> | | |
| Community Area Employment | 9,390 | 9,390 |
| <i>Persons & Jobs</i> | | |
| Total Population and Employment | 61,250 | 61,250 |
| <i>Persons & Jobs per Hectare</i> | | |
| Density (p&j per ha) | 66 | 50 |
| <i>Hectares</i> | | |
| Required DGA Community Area | 928 | 1,225 |
| Existing DGA Community Area | 975 | 975 |
| Surplus / (Shortage) | 47 | (250) |

Source: City of Guelph, Growth Scenario Planning - Shaping Guelph, Growth Management Strategy, (March 2021), Growth Plan for the Greater Golden Horseshoe

Conclusions Regarding City of Guelph Land Needs Analysis

In summary, there are numerous issues with the methodology, assumptions and inputs the City is relying upon in estimating the need for additional urban land in the City and its ability to accommodate the housing and population forecasts allocated to the City to the year 2051 in the Growth Plan for the Greater Golden Horseshoe:

- The City is not utilizing the minimum density targets for greenfield areas in estimating land needs, as directed by the Growth Plan, and is therefore understating the land needs to meet the projected demand for new housing in the City;
- Additional detail is required to understand what is included and excluded from the City's supply of existing designated greenfield area;

- The City's GMS does not assess the demand and supply of housing by dwelling unit, as required by the Growth Plan and the Land Needs Assessment Methodology, which will lead to a significant mismatch of housing demand with housing supply;
- The City appears to be over estimating the intensification potential in parts of the City outside of its key intensification areas. Assuming 100% build-out of all unit potential in the City's Downtown, its Community Mixed-Use Nodes and Intensification Corridors, the City is requiring roughly one-third of all intensification units to be in other parts of the City's existing communities, and the City needs to properly rationalize and understand the capacity for those areas to take on growth, and what the implications are for community infrastructure, transit accessibility, and other City-building objectives;
- A significant proportion of new housing projected to be built in the City to 2051 is in 'accessory apartments', which the City is basing future projections of on recent historic trends. Not only is the City's forecast share of accessory apartments (11%) roughly 5-7 times higher than the shares assumed by nearby municipalities of Halton Region and the City of Hamilton (1.4% to 2.5%), but the higher proportion used by the City has not been justified. The City's reliance on these accessory apartment units to meet forecasted housing demand ignores that a significant proportion of the demand for these units historically has come from students responding to no new on-campus housing being constructed at the University over the past 20 years, despite enrolment increasing by 92% over that same period;
- The reliance on accessory apartments to meet housing demand also ignores that a significant proportion of the residents of these units will be students who do not count towards the achievement of the City's population forecasts – rather, the demand for these units by out-of-town students, and other non-permanent residents should be added to the quantum of the City's overall housing demand;
- The City's housing forecasts rely heavily on apartment dwellings to meet demands for housing, however for many households and families, apartments will not meet their housing needs and are not and in many cases will not be a suitable substitute for ground-related housing. Further, the reliance on older households to move from their family homes to make room for younger families is not supported by data that shows an increasing propensity to 'age in place' rather than move to a collective dwelling for health or financial reasons.
- Further, the City's housing forecasts, as presented in the three growth scenarios the City's GMS studies, based on the City's assumptions of future household sizes by unit type, would each fall short of the population the City needs to plan to achieve. Beyond the mismatch of housing supply with housing demand by unit type, there is a shortfall of 250 to 1,750 units required in the City's housing forecast to achieve population growth to 2051.

Given all of the foregoing issues, it is likely that the City's estimate of land needs has been significantly understated, and the City's need for additional urban lands should be reassessed.

Delivered as an e-mail attachment

June 7, 2021

Mayor Cam Guthrie
City of Guelph
1 Carden Street
Guelph, ON
N1H 3A1

Dear Mayor Guthrie:

RE: Land Use Strategy and the Municipal Comprehensive Review (MCR) for the City of Guelph

The Families for Rolling Hills Group, FFRHG, would like to thank you and Council for the consideration you have given our concerns in the past and hope that we may rely on you to continue to do so in the future.

Attached you will find a report prepared by the urban planner FFRHG has engaged to monitor the MCR from our perspective. They raise a number of very serious concerns regarding the Land Use Strategy that has been presented to Council and the public to date. Very briefly it appears that either the consultants hired by the City to provide the analysis, or the City's own Planning Department have recommended that the Rolling Hills neighbourhood should bear a disproportional burden when it comes to accommodating the City's future growth. It appears that 20% of the required growth in the built-up area of the City has been targeted for Rolling Hills. We find this particularly troublesome since the consultants have clearly indicated that the redevelopment of Rolling Hills is not required to meet Guelph's 2051 growth targets. If it is not required then why are we having this discussion?

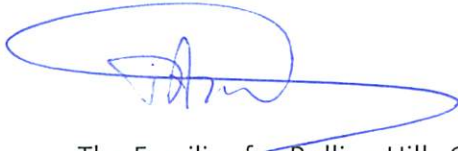
Please keep in mind that the properties in Rolling Hills are privately held lands, subject to legal restrictions that limit any sort of intensification, we therefore question why any plan would rely so heavily on a change in status for this area. As we have indicated in the past, any attempt by a homeowner to develop their properties beyond what is permitted in our restrictive covenants will be vigorously opposed.

Rolling Hills is an established estate residential neighbourhood. Currently, the only such community within the City of Guelph. We recognize the need for the City to plan for the future, but not at the expense of existing home owners. Housing diversification cannot only mean

intensification. It must include housing alternatives across a broad spectrum of needs and desires. Estate residential properties have a place in Guelph's future residential landscape.

We will be pleased to meet with yourself and/or any members of Council that would like to discuss our concerns in greater detail. We appreciate your continued support.

Respectfully,



The Families for Rolling Hills Group

Cc: Guelph City Councillors

City of Guelph Planning Department

May 31, 2021

ROLLING HILLS AREA: FOCUS OF THE MUNICIPAL COMPREHENSIVE REVIEW

The City of Guelph is now completing the Municipal Comprehensive Review ("MCR"). This review is the precursor to the preparation of the updated Guelph Official Plan. The City of Guelph is required to adopt the new Official Plan by July 1, 2022 for submission to the Minister of Municipal Affairs and Housing.

The next component of the MCR is the completion of the Land Needs Assessment ("Land Needs") in early Summer 2021. The Land Needs study determines the total amount of land that is needed in the City of Guelph to accommodate forecasted growth. Land Needs includes residential and employment lands. The forecast to the year 2051 is mandated in Schedule 3 of *The Place to Grow: Growth Plan of the Greater Golden Horseshoe* ("APTG") that came into effect on May 16, 2019 and was amended on August 28, 2020. The Provincial Government forecasts that in Guelph, planning for 203,000 people and 116,000 jobs must be accommodated by the MCR and the Guelph Official Plan.

Findings: Growth Scenarios and the Urban Structure (as of April 27, 2021)

1. The existing designated "Reserve Lands" in the Guelph Official Plan were never realistically perceived by the community to be reserved for residential redevelopment in the built-up Rolling Hills Area. The 2006 Growth Plan for the Greater Golden Horseshoe recognized the entire Rolling Hills Area as part of the Guelph Delineated Built-Up Area.
2. There is no apparent support for this proposal when the analyses in the Reports readily admit that there is sufficient existing capacity within the City of Guelph to accommodate the forecasted population growth to 2051. On balance, there is no need to target the Rolling Hills Area for future growth.
3. The recommended Strategic Growth Area on the south side of Clair Road east in the Rolling Hills Area is not justified by the growth criteria in the City's Report and it is not supported by reasoned evidence.
4. The assumption that the Rolling Hills Area can accommodate 3,176 dwelling units is based on an incorrect belief that the privately owned wide-open spaces in the Rolling Hills Area are sufficiently available for new market-based housing supply by 2051. Until April 2021, in the City's Reports, there is no indication that extensive development in the Rolling Hills Area is needed for growth in the BUA.
5. There is no reasonable justification in the City's Report that the presumed allocation of 3,176 dwelling units in the Rolling Hills Area should contribute 20% of the additional dwelling units allocated in the Built-Up Area of the City.



6. The effect of reducing the residential capacity in the Clair-Maltby Secondary Plan area drives the assumption that the Rolling Hills Area has sufficient capacity to accommodate growth. The explicit assumption in the Reports is that the Rolling Hills Area is intended to be integrated with the Clair-Maltby Secondary Plan Area and it is to be considered (wrongly) within the Designated Greenfield Area rather than the Built-Up Area.
7. The form of residential intensification assessed in the Report inappropriately increases the overall gross residential density to a future 25.6 units per hectare in the Rolling Hills Area.
8. There is no reasonable justification for the assumption that 55% of the total residential growth annually, rather than 50%, in the City of Guelph should be assigned to the Growth Scenario 3 in the Built-Up Area.
9. The Growth Scenario 3 proposal disables the stable estate residential community that has existed since 1986 and will sustain perpetual anxiety among the residents/owners.
10. Families in the Rolling Hills Area will exist in suspended animation anticipating displacement and they will need to find alternative residential housing locations in order to replicate their current living environment.
11. It is doubtful that the Land Needs Assessment is expected to designate any new lands in the City of Guelph where minimum two hectare estate residential lots will be available for residents of the Rolling Hills Area within a community. Retaining the estate residential housing in the Rolling Hills Area is a good example of achieving the mix of housing types in the City of Guelph.

The Rolling Hills community is not isolated or confined. It exists within the urban structure landscape of the City of Guelph and the Province of Ontario. The enduring aspirations of the Rolling Hills community, the integrity and stability of the existing housing and private spaces, the character of the community, and the significance of the natural heritage features and functions are all indicators of good planning considerations. There is an existing balance between private and public interests that must not be upset.

In my opinion, as Guelph Council originally decided, Council is obligated to finally determine that the entire Rolling Hills Area to be within the Built-Up Area as an established estate residential community. Scenario 3 is a drastic growth strategy that destroys the integrity of the Rolling Hills Area within the Guelph Urban Structure.

The findings are derived from the following analysis of the assumptions contained in background Reports.



Regarding Assumptions in the Municipal Comprehensive Review: From September 20, 2020 to April 27, 2021

This forecasted growth is to be accommodated on lands within the Built-Up Area ("BUA") and the Designated Greenfield Areas ("DGA"). The Delineated Built-Up Area is described as the lands where development existed as of June 16, 2006. The 2006 Growth Plan for the Greater Golden Horseshoe correctly identified the entire Rolling Hills Area in the Delineated Built-Up Area. In hindsight, the Rolling Hills Area should have been removed as "Reserve Lands" in the 2013 Guelph Official Plan Update.

The Rolling Hills Area is entirely included within the Built-Up Area in APTG and in the existing Guelph Official Plan Urban Structure. This particular BUA has a gross land area in the order of 124 hectares (306 acres). As a BUA, it is characterized as an estate residential area with 56 lots and 54 existing dwelling units. The average residential lot size is in the order of 2.1 hectares (5.2 acres). The Rolling Hills Subdivision Plan with 52 lots is the significant component of this BUA. This Plan was registered on July 3, 1986 in the then Township of Puslinch.

The City of Guelph retained two consultants, Dillon Consulting Limited and Watson & Associates to undertake the background analysis for the MCA and to make recommendations to the staff of the City and to Council. These analyses include the housing analysis, the residential intensification analysis, and the growth scenarios. Guelph Council has been provided with these reports and recommendations and held Council Workshops at various times. There has been provision for public consultation and review at various points in preparing the MCR. The next step in the MCR is to present Council and the public with the recommended preferred growth strategy, based on the Land Needs Assessment.

In the APTG, the allocation to the Built-Up Area of the City is the priority "where to grow". The preferred method of developing housing within the BUA is through Intensification. The Provincial policy does not mean intensification everywhere in the BUA. The Land Needs Assessment determines where there is sufficient land available to accommodate all housing segments. The objective of the assessment is to provide a market-based supply of housing in the BUA and in the Greenfield Areas of the City.

The APTG directs that a minimum of 50% of all residential development occurring annually in the City of Guelph "will be within the delineated built-up area". The City's growth strategy must identify "strategic growth areas" as "a key focus for development". As part of the strategy, intensification is encouraged generally throughout the BUA.

Intensification is broadly defined by the Provincial Government as development at a higher density than currently exists. The methods of achieving intensification are through redevelopment; development of vacant and/or underutilized lots in developed areas; infill development; and expansion or conversion of existing buildings.

The City's Reports concluded, after completing the housing analysis, that the City of Guelph has a sufficient area of land to house the forecasted population to 2051 within various sub-growth areas. The forecasted need is for 31,250 dwelling units within the entire City. The estimated land capacity is an additional 35,000 dwelling units in the entire City.



The consultants evaluated all of the existing residential lots in the City and made certain assumptions that are relevant to understanding the implications for the Rolling Hills Area. They considered the "Reserve Lands" designated in the existing Guelph Official Plan (including the Rolling Hills Area); they considered lots located on arterial and collector roads as preferred areas for intensification (Clair Road east); and they preferred residential intensification on subdivision lots where the dwellings were built prior to 2005 (Rolling Hills Area).

An "Urban Structure Technical Brief" dated March 2021 was made available publically on April 9, 2021. This Report contains the three growth scenarios "selected for consideration and evaluation" by Council and the public. Separately, in the same Report, the Proposed Urban Structure for the entire City was presented. Since this is a critical component of the MCR, it is best to understand the staff's explanation of the Urban Structure that was made to Guelph Council on April 27, 2021:

An urban structure defines areas of the city which are the focus of growth. Currently Guelph's urban structure focuses growth:

- In intensification corridors (areas along major roads/transit corridors) where higher density, mixed use development is possible
- In nodes (areas at the intersection of two major roads) that are planned for higher-density mixed uses

An urban structure can also show areas of the city that are already developed, areas protected for employment uses, and areas planned for future urban uses.

The Urban Structure includes residential and employment growth as forecasted by APTG and in the context of the provincial policy directions. The current thinking is that growth to 2051 occurs in these areas:

Built-Up Areas as they existed in 2006
Designated Greenfield Areas that were developed after 2006
Urban Growth Centre - the Downtown
Major Transit Station Areas
Strategic Growth Areas (Nodes and Corridors)
Employment Areas
Provincially Significant Employment Areas
Non-Settlement Areas

As of April 27, 2021, this is the essence of the logic of the assumptions applied by the consultants in arriving at the three scenarios and the proposed Urban Structure:

- The scenario's are to align with Council's growth vision and principles endorsed on June 15, 2020;
- There is no expansion of Guelph's municipal boundary;
- Accommodate 203,000 people and 116,000 jobs in 2051;
- Accommodate a minimum of 12,500 dwelling units in the BUA;
- Include the Guelph Innovation District Plan and the endorsed community structure for the Clair-Maltby Secondary Plan;
- There is a minimum of 150 persons and jobs per hectare in the Urban Growth Centre.



These fundamental elements were modified in the Report in considering the growth scenarios:

- Assign more than 50% of new housing to the BUA;
- Adjust the location and type of housing in the BUA;
- Create new nodes and corridors;
- Adjust the pace of growth in the Designated Growth Area;
- Explore alternative employment land densities.

The three growth scenarios for residential growth in the BUA are described simply as:

Growth Scenario 1

This is a growth scenario that reflects the existing Guelph Official Plan and the existing Urban Structure adapts the minimum targets for the BUA and the DGA. The housing mix is oriented to high-density housing forms (70% of total housing in the BUA). The growth assumption is 15,620 dwelling units for 30,300 people.

Growth Scenario 2

This growth scenario increases the share of medium-density housing and reduces the share of high-density housing. The high-density housing share is reduced to 61% of total housing in the BUA. The growth assumption is 15,620 housing units for 30,300 people.

Growth Scenario 3

The minimum residential intensification density is increased from 50% to 55% in the BUA. The proposed Clair-Maltby Secondary Plan Area, in the Greenfield Area, is modified to reduce the previous allocation of high-density dwellings by 1,820 units and low-density and medium density is increased in the Secondary Plan Area. The growth assumption is 16,865 dwelling units for 31,700 people in the BUA. The total growth of dwelling units is 1,245 in the BUA because of the reduction in the Clair-Maltby Secondary Plan Area (the DGA).

The consultants made the following strategic assumptions regarding the existing Rolling Hills BUA.

- The potential growth scenarios can explore different approaches for lands within the Built-Up Area that are currently designated Reserve Lands in the Official Plan (eg Rolling Hills Area).
- Part or all of the Rolling Hills Area will be developed. The Rolling Hills Area is assumed to be divided into two parts.

Area 1 (North Part) consists in the order of 43 hectares (106 acres). In the order of 20 hectares (49 acres) are proposed as a Strategic Growth Area fronting on Clair Road East for "Medium Density Residential" and "Low Density Greenfield Residential". The balance of the internal 23 hectares (57 acres) is for "Low Density Greenfield Residential" and "Significant Natural Areas".



Area 1 is assumed to allocate net 203 low density dwellings, 361 medium density dwellings and 923 high density dwellings. This assumption will demolish 18 estate residential dwellings. The total net increase is 1,487 dwelling units for an estimated 3,400 people.

Area 2 (South Part) consists in the order of 81 hectares (200 acres). The residential component is proposed for 'Low density residential, or residential category to be determined'.

Area 2 is assumed to allocate net 522 low density dwellings, 304 medium density dwellings and 863 high density dwellings. This assumption will demolish 36 estate residential dwelling units. The total net increase is 1,689 dwelling units for an estimated 3,800 people.

These strategic assumptions regarding growth in the Rolling Hills Area are found in two footnotes to Figures 1 and 7 (pages 3 and 10) in "Appendix A. Alternative Growth Scenarios 2 & 3. Summary of Draft Population and Housing Forecast". March 2021.

If the Land Needs assumptions are followed through by Council, the entire Rolling Hills Area will be developed with 3,176 dwelling units with a loss of 54 estate residential dwelling units. The population in 2051 under this assumption is in the order of 7,200 people.

Another critical consequence of the proposed Urban Structure is the recommended Strategic Growth Area ("SGA") along Clair Road east from Dallan Drive to Victoria Road on the north and south sides. The consultants made the assumption that the "large estate residential lots on the south side of Clair Road have the potential to accommodate growth due to their size and location along Clair Road". The consultants conclude that this new SGA provides "focus for growth in new greenfield communities that align with the direction in the approved or in progress secondary plans and provide a focus area for growth in the south-east end of the city".

These assumptions and conclusions are now open for critical review by Council and the public in preparing the Land Needs Assessment and the completion of the MCA.



Mark L. Dorfman, F.C.I.P., R.P.P.





December 17, 2020

Guelph City Hall
1 Carden Street
Guelph, Ontario N1H 3A1

Via email only to plan2051@guelph.ca

Attention: Natalie Goss, Senior Policy Planner
Planning and Building Services

Re: Shaping Guelph – Official Plan Update

The members of the Guelph and Wellington Developers Association (GWDA) and the Guelph and District Home Builders Association (GDHBA) have participated in the engagement sessions related to the Shaping Guelph process and provide the following comments.

Guelph is required to plan to meet provincial growth forecasts for a population of 203,000 and 116,000 jobs by 2051. We have to remember that these growth targets are minimums.

During one of the workshops, Watson & Associates reported that between 2021 and 2051 the City is proposing that 2,500 new single detached and semi-detached dwellings be constructed. This is approximately 83 single detached and semi-detached dwellings being constructed annually. This is an inadequate supply and is not in line with what the marketplace is demanding.

Compare this with the City's 2004 Development Priorities Plan that identified a supply of 4,601 single and semi-detached units that were available to the market. The current supply of housing has been restricted. Simple economics of supply and demand means that the lack of ground-related housing supply will further increase the cost of housing and erode affordability. Up to the end of August 2020, the City of Guelph has issued just 65 single family home building permits. These numbers are just not acceptable. In 2019, CHBA calculated that in Guelph new home construction represented almost 907 new homes, 2,299 jobs, and \$145 million in wages and \$273 million in investments. The new home building industry is essential to Guelph's economic strength and prosperity.

The current supply of housing has been restricted to the point that older homes are being purchased for the value of their lot with the existing home being demolished and a new home constructed.

It should be obvious why housing is now unaffordable in Guelph. It should be obvious why people must purchase a home outside of Guelph and commute in from other communities to work in Guelph. Where will business owners, doctors, senior executives, university professors live in Guelph? Guelph is intentionally turning the housing supply upside down. There is an imbalance in the oversupply of apartment units and undersupply of ground-oriented homes.

It was suggested at one of the workshops that some of the land within the City limits be held out of the supply until after 2051 which would result in even higher densities, more traffic congestion and would irreparably change the character and future of Guelph. We need to carefully and cautiously consider what we value in Guelph and what the quality of life in this community will be. Keeping land out of the available supply will only exacerbate the current situation of rapidly rising home prices. Recently, the Guelph Innovation District deal did not proceed. The Province owns and controls the majority of these lands. If the Guelph Innovation District lands are not available as part of the land supply this will have dire consequences to Guelph.

A survey conducted by AVID regarding "Next Home" preference of today's new homebuyer in Guelph was that 62.7% will be seeking a single-family, detached home type in Guelph with the majority of the others looking for ground related dwelling. This is versus only 12.6% of those surveyed were looking for a mid-rise condo or high-rise condo.

It has to be recognized how long the planning process takes in the City of Guelph, the Clair-Maltby Secondary Plan was originally planned as a four year process. Currently the Clair-Maltby Secondary Plan is finishing off its sixth year, with finalized plans or approvals not in sight. In our experience in other municipalities a Secondary Plan process generally takes a maximum of 3 years from inception to approval.

It is even more important that the Clair Maltby Secondary Plan be approved in a timely fashion including ground-oriented market driven housing. There is so little land remaining to supply housing within the Clair-Maltby Secondary Plan area once 46% is netted out for the natural heritage system (much of this featuring only slopes) the moraine ribbon, schools, parks and stormwater management. If the Secondary Plan was prepared indicating the actual area taken up by these uses rather than as symbols, the amount of remaining residential land available would become much more evident. This also plays out on infill and intensification sites identified throughout the city, once setbacks, park dedication, height restrictions, NIMBY reductions, environmental constraints the actual land available for intensification is much less than budgeted.

The current housing supply being provided in the City is entirely policy driven. The housing supply is not market driven. Investors have shielded the City from the brunt of this disconnect by purchasing units. However, the housing crisis is building in the City and the results will be difficult for families who are working hard and would like to be on the property ladder. There is only one reason why prices go either up or down and that is the relationship between supply and demand.

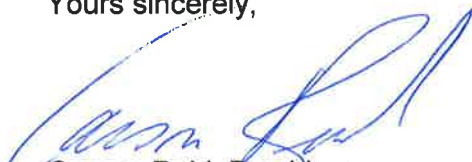
The pandemic has forced the transformation to telecommuting and the market is looking for a single family home. People are seeing their house as now more than a home; it's an office, a gym, a restaurant, a school and a playground. A home is the largest household asset and the largest single wealth-builder for most families. The aspirational Canadian dream is still a single family home.

We appreciate the opportunity to provide these comments. Winston Churchill has been quoted as saying,


"However beautiful the strategy, you should occasionally look at the results."

We understand that the City is required to meet the minimum Provincial Growth Plan targets, however, the City is at a crossroad and needs to check-in with the reality of the current housing supply and all that this means to Guelph's future quality of life and prosperity.

Yours sincerely,



Carson Reid, President
GWDA



Tom McLaughlin, President
GDHBA



March 19, 2021

Project No. 12030

City of Guelph
Planning and Building Services
Infrastructure, Development and Enterprise
1 Carden Street
Guelph, ON N1H 3A1

Att: Natalie Goss, Senior Policy Planner

Dear Ms. Goss:

**Re: Request for Comments
Housing Analysis and Strategy ("HAS") – City of Guelph
331 Clair Road East, Guelph**

GSP Group represents Reid's Heritage Homes with respect to the above-noted property (the "Property").

The Property is approximately 1.6 hectares (4 acres) in size and contains an existing vacant home (historic farm house) and shed. The Property is located on the south side of Clair Road with access driveway opposite Tolton Drive. The Property is not part of the Rolling Hills subdivision but is surrounded on three sides by lots in that subdivision.

We have reviewed the HAS. As noted in the February 19, 2021 Information Report, "The purpose of the HAS is to confirm Guelph's population and housing needs to 2051 and outline and appropriate housing mix and density targets that conforms to the APTG (A Place to Grow) and aligns with the City's draft vision for growth."

As noted in Section 5.4.1 of the HAS, the Guelph Official Plan "does not currently identify other strategic growth areas, however it does designate a number of community mixed use nodes and intensification corridors..." Section 6.2 of the HAS indicates next steps are to identify alternative growth scenarios. With that in mind we offer the following observations and comments in support of future growth and intensification of this Property and immediate surrounding area:

- The Property, as well as other estate residential properties contained in the northern portion of the Rolling Hills subdivision that access via Clair Road East (from Victoria Road South extending eastward to the existing Dallan subdivision) termed (the "Area") are ideally situated to accommodate future strategic residential and neighbourhood serving

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commercial growth along the Clair Road East corridor. We envision this area would transition from estate residential use to accommodate more typical urban development forms and density. The north side of the Clair Road East is almost fully built-out as part of the Westminster Woods subdivision. Likewise from the Dallan subdivision easterly to the Gordon Street is in the final stages of home construction.

- We believe the Area could accommodate a range and mix of residential housing options and density that transit supportive and respectful of the urban development patterns along this corridor.
- Clair Road East between Victoria Road South and Gordon Street is an existing arterial road.
- Existing municipal infrastructure could be used to support future growth in the Area, along with any improvements required to assist with the growth in the Clair-Maltby Secondary Plan area.
- This Area can be developed and integrated into the existing urban structure which already has a range of schools, parks, trails, and commercial/service uses in the Clair/Gordon mixed use node, along with neighbourhood commercial/services uses. As well, a new Sikh Gurdwara is almost complete on the north side of Clair Road East across from this Area.
- Most of the surrounding subdivisions have been designed to be walkable and transit supportive (bus route and stops to the north) and we see this Area being designed in that manner and be fully integrated into the community.

We appreciate your consideration of our comments and look forward to reviewing the alternative growth scenarios as part of the next steps in the process.

If you have any questions in the meantime, please do not hesitate to reach out to me on my cell at 519-242-5351.

Sincerely,
GSP Group Inc.

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP
Senior Associate

cc Jeff Robinson, Reid's Heritage Homes
Pete Graham, GWD Developments Ltd.



March 16, 2021

VIA EMAIL only to plan2051@quelph.ca

City of Guelph
Planning, Urban Design & Building Services
1 Carden Street
Guelph, ON N1H 3A1
Attention: Natalie Goss, MCIP RPP, Senior Policy Planner

Re: Housing Analysis and Strategy
Shaping Guelph, Growth Management Strategy

Dear Natalie:

We have been following the Shaping Guelph, Growth Management Strategy and had the opportunity to review the *"Housing Analysis and Strategy, Shaping Guelph: Growth Management Strategy February 2021"* (HAS) report. We understand that the purpose of the HAS is to confirm Guelph's population and housing needs to 2051 and outline an appropriate housing mix and density target that conforms to APTG. We would like to provide our comments as follows:

- The HAS indicates it will determine the appropriate mix of housing to 2051, but we have concerns that the proposed unit mix of 10% low density, 22% medium density, 56% high density housing and 11% accessory apartment units is not in touch with the reality of market desires.
- We are concerned that the level of analysis presented in Section 3 *"Demographic and socio-economic drivers of housing intensification"* is lacking in its level of detail. The Section provides a very high level, generic overview of the demographic and socio-economic drivers of housing intensification within the City.
- For example, Section 3.5 which outlines *"Future market demand for ground-oriented and high density housing forms"*, suggests there is strong market demand for higher density housing forms on the basis that 3/4 of current residential development applications across the City are high density. Drawing this conclusion based on current development applications ignores the reality that opportunities for ground-oriented development has diminished over time; there are circumstances at play other than market demand. The share of high-density housing projects will naturally increase as opportunities for ground-oriented development becomes constrained and the City of Guelph is currently in a period of constrained land supply. Furthermore, many builders/developers leave the high-density blocks within their plans of subdivision as the last to be built, as the ground-oriented housing product is the most popular and marketable.
- The HAS doesn't consider that many in the Baby-Boomer generation have chosen to age in place, which has not translated into single family homes entering the real estate market for younger generations to buy. The Covid-19 pandemic may accelerate the appeal of aging in place rather

than moving into congregate settings such as retirement homes, seniors residences etc. thus further constraining the supply of single family homes trading in the market.

- Additionally, the Covid-19 pandemic has highlighted people's desire for space; space for home offices, home schooling, home gyms, backyards for children to play. A house has become much more than a home and the desire for space has fueled a migration from denser urban centres to smaller and mid-sized communities such as Guelph.
- If the City wants to remain competitive in its ability to attract new employers and business then choice in the housing market also needs to be a priority so people can both live and work in the same city. People now must commute into Guelph from other communities because they cannot afford to live here. The lack of low density supply in our City has caused people to move to rural areas and small towns in order to find a single family home.
- In the discussion of "housing affordability trends" it is stated that housing affordability plays a key role in influencing the demand by structure type, but no where in the discussion is there mention of basic supply and demand principles. The greater relative increase in ground-oriented housing prices has resulted in an erosion of housing affordability for low-rise housing forms, forcing people to choose housing alternatives that are not their first preference, thereby inflating the demand of high-density housing, or forcing people to delay their dreams of home ownership.
- Demand for high density development will remain strong as a function of the lack of choice within the housing market, not because it is necessarily the first choice in housing accommodation for many people.
- The HAS plainly states that planning policy will also influence this shift toward high-density development. Planning policy has contributed to the affordability crisis by restricting the supply of ground-oriented housing that the market demands.

The City of Guelph has the opportunity through planning policy to help address the housing supply imbalance in Guelph and ensure the quality of life our City offers continues. We thank you for your consideration of our comments.

Sincerely,



Tom Krizsan



Modern Thinking. Timeless Values.™

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October 27, 2021

Submitted via email only to clerks@guelph.ca

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

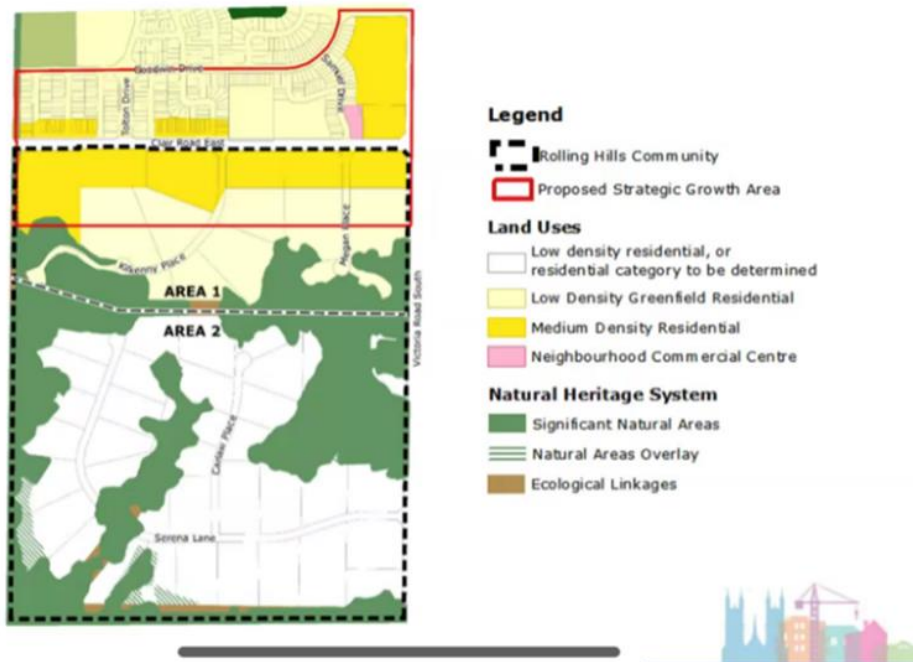
Attention: Mayor Cam Guthrie and Members of Council

Re: Shaping Guelph – Official Plan Update (Municipal Comprehensive Review)
Strategic Growth Area – Clair Road East
South Clair Road Neighbourhood Association
331 Clair Road East, Guelph

Reid's Heritage Homes is an owner of 331 Clair Road East (2488995 Ontario Ltd.). The property is part of the South Clair Road Neighbourhood Association. This association was formed by community members on the south side of Clair Road and from within Rolling Hills in support of the City's initiative for residential growth along Clair Road East.

We are in **support** of the Strategic Growth Area along a portion of Clair Road East and the proposed land-use designations of Low Density Greenfield Residential and Medium Density Residential in Area 1 as presented by City Staff.

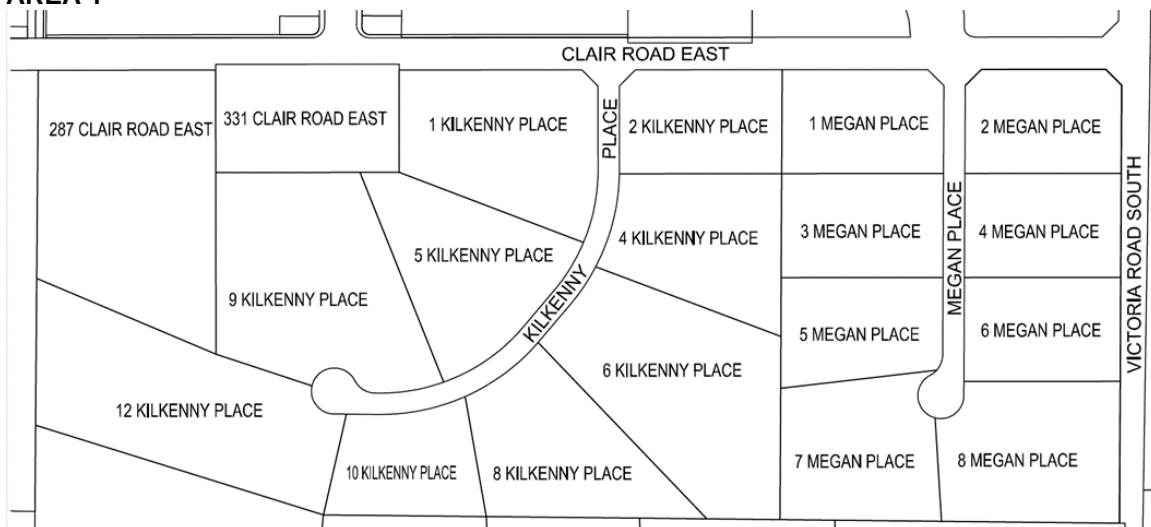
Rolling Hills – growth options



The City is taking a reasonable, sensitive, and well thought out approach by identifying Rolling Hills as two areas (Area 1 and Area 2) for the purposes of planning for this community. City Staff have found an appropriate balance to proceed forward, providing opportunity for continued residential community development along Clair Rd. within Area 1 while being fair and respectful to the concerns expressed by some community members within Area 2 through land-use planning and policies to maintain this established and stable neighbourhood.

Area 1 has been identified within the City of Guelph Built-Up Area since June 16, 2006 by the Province and the Guelph Official Plan identifies the Built-Up Area as a location to direct intensification. The proposed designations by Staff will introduce “gentle density” along Clair Road as per the notion introduced by Jennifer Keesmaat in her remarks at the initiation of the Shaping Guelph process. This “gentle density” provides opportunities for continued community growth along the south side of Clair Road East, utilizing existing infrastructure in terms of access, services, and community amenities that have evolved in this area over the last 20 years. This gentle, measured community development, directed towards Clair Road, would then transition to the south whereby low density residential and the existing natural heritage features provide an appropriate and needed transition to the Rolling Hills Area 2 community.

AREA 1



The proximity of Area 1 having frontage and direct access only to Clair Road East provides an opportunity for designing compatible and appropriate land-uses for both Area 1 and Area 2. The development of Area 1 will not add any additional traffic or disruption on the local residential streets located in Area 2. The existing natural heritage area acts as a buffer between Area 1 and Area 2 which must be maintained in accordance with the City’s Official Plan policies. There will be no development “creep” into Area 2 if policies are included within the Official Plan to recognize Area 2 as a stable residential area and we encourage the City to implement such policy measures.

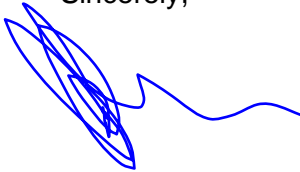
The growth option as presented by City Staff could further be reinforced to the benefit of both Area 1 & 2 and the broader community with site specific policies in the Official Plan such as:

- Provide a transition in density and height between Area 1 and Area 2.
- No vehicular connections be permitted between Area 1 and Area 2.
- New development within Area 1 shall be on full urban municipal services;
- The existing Natural Heritage System shall be protected and act as a buffer and natural separation between Areas 1 and 2.
- Any pedestrian and cycling linkages between Area 1 and Area 2 shall be provided in accordance with the Natural Heritage System policies of the Official Plan.
- An Urban-Rural Transition Zone be included in Area 1 along Victoria Road South.

As a community builder with a deep history in Guelph and a commitment to continue to invest and provide for much needed community development in this area, Reid's Heritage Homes supports Staff's proposed Strategic Growth Area and Low Density Greenfield Residential and Medium Density Residential designations proposed for Area 1. The proposed redesignation of these lands represents responsible, efficient, and sensitive land-use planning.

Thank you for the opportunity to provide these comments and engaging with area residents and community members on the growth and direction for this neighbourhood. Please provide me with notice of the decision of Council related to the Shaping Guelph Official Plan Update.

Sincerely,



Jeff Robinson, MCIP, RPP
Director, Development Planning



SHAPING GREAT COMMUNITIES

October 8, 2021

Project No. 12130

Submitted via email only to clerks@guelph.ca

City of Guelph
Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Mayor Cam Guthrie and Members of Council

Re: Shaping Guelph – Official Plan Update (Municipal Comprehensive Review)
Strategic Growth Area - Clair Road East
331 Clair Road East, Guelph

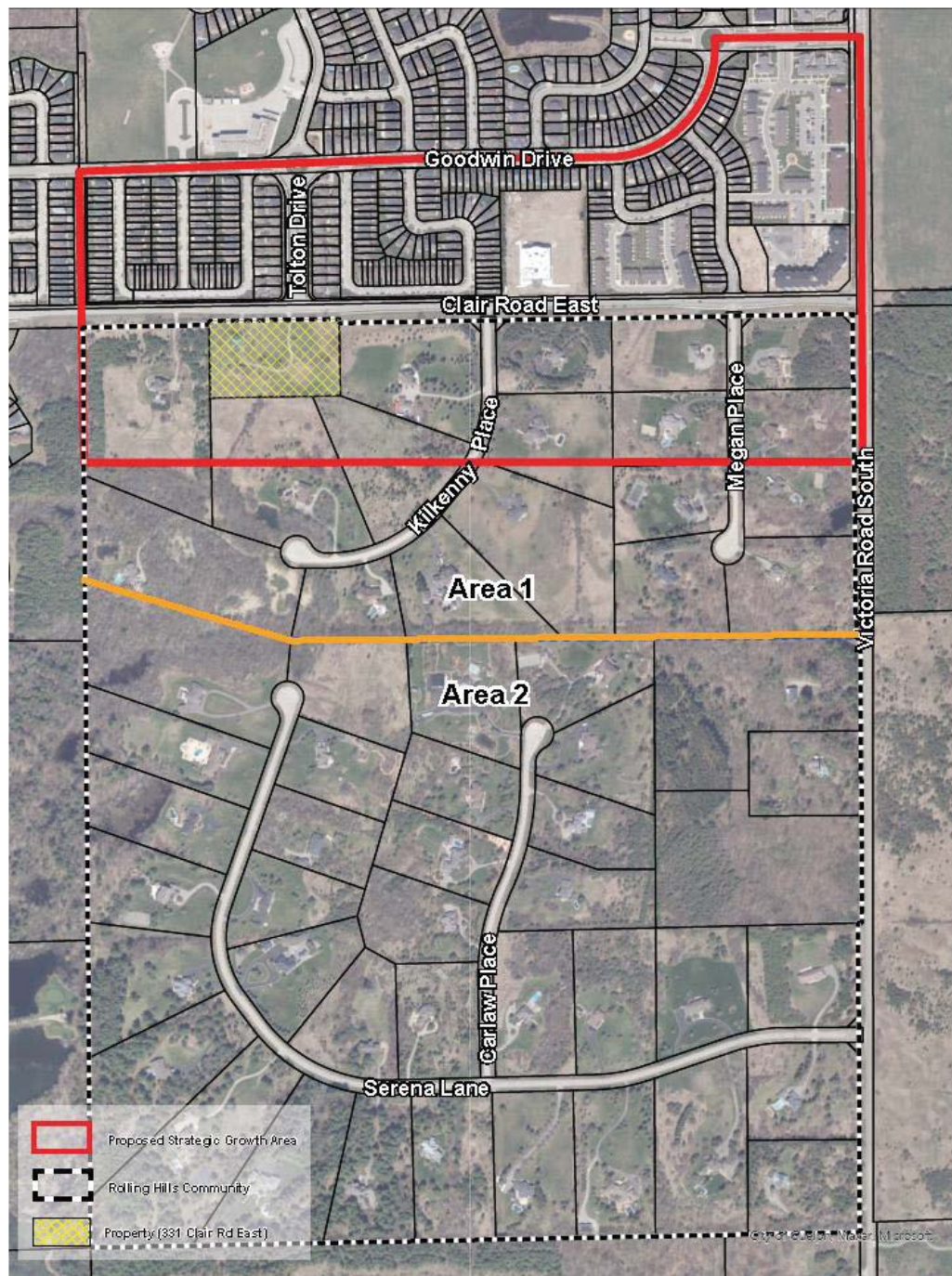
GSP Group ("GSP") acts as planning consultants for the owners of 331 Clair Road East - the "Property" (2488995 Ontario Ltd. and Reid's Heritage Homes Ltd. – the "Owners"). The Property is part of the South Clair Road Neighbourhood Association. We are in **support** of the Strategic Growth Area along a portion of Clair Road East and the proposed residential land use designations in Area 1 as presented by staff.

GSP has represented the Owners of the Property since 2011 related to land use planning matters. The Property is approximately 1.6 hectares (4.1 acres) in size and fronts onto the south side of Clair Road East (see map below).

The property contains an existing vacant stone heritage home and accessory shed. The Property has a driveway access opposite Tolton Drive. The Property sits with Rolling Hills area but is not legally part of the Rolling Hills subdivision (i.e. a separate lot surrounded on three sides by estate residential lots in the subdivision).

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gspgroup.ca



GSP has reviewed and participated in the Shaping Guelph process since the commencement in 2019. We also participated in a virtual meeting focusing on the Rolling Hills area on April 20, 2021, which highlighted growth options and urban structure for the City and land uses specifically for Rolling Hills.

We offer the following land use planning background and comments below for consideration by Council and City staff.

Land Use Planning Background

In June 2012, GSP Group on behalf of the Owners submitted an Official Plan Amendment and Zoning By-law Amendment on behalf of the Owners to permit 60 cluster townhouse development (the “Applications”) including the retention of the stone heritage home on the Property.

The Applications requested a redesignation of the Property from “Reserve Lands” to “General Residential” (2001 Guelph Official Plan) and to amend from the former Township of Puslinch Zoning By-law A-2 Specialized Agricultural zone to an R1.A (Specialized Residential Single-Detached zone and a R3.1 (Specialized Residential-Townhouse) zone, with site specific regulations under City of Guelph Zoning By-law 19/85.

City Council did not make a decision on the Applications within the time periods in the Planning Act and the matter was appealed to the OMB by the Owners. The OMB Case No. is PL140028 which was heard in March 2015.

Ultimately, the OMB concluded the Applications were premature until the completion of the Clair-Maltby Secondary Plan. While the Applications were made prior to the approval of OPA 48, at Paragraph 64 of the OMB decision it states:

The Board observes that the Clair-Maltby secondary plan process noted at s.9.10.3 of OPA 48 demonstrates the City’s intention to postpone the development of the Reserve Lands in this area until other land use designations are considered through a secondary plan.

In the meeting notice for the April 20, 2021, in the “Shaping Guelph Town Hall Invitation for the Rolling Hills area” it stated:

Growth options for the Rolling Hills community were originally being considered through the city’s in progress Clair-Maltby Secondary Plan (CSMP). In 2018, the boundary of the CSMP was amended to remove Rolling Hills community and future growth and land use for Rolling Hills was referred to the city’s municipal comprehensive review.

Accordingly, the future growth options and land use for Rolling Hills as noted above was moved to the City’s Municipal Comprehensive Review of the Official Plan – i.e., Shaping Guelph.

Land Use Planning Comments

In May 2019, the Province released A Place to Grow: Growth Plan for the Greater Golden Horseshoe (APTG). Amendment 1 to APTG was approved with an effective date of August 28, 2020. APTG guides growth and development within the Greater Golden Horseshoe over the next 30 years. In part the APTG requires the City to establish an updated urban structure, including the delineation of strategic growth areas (SGAs) (formerly intensification areas).

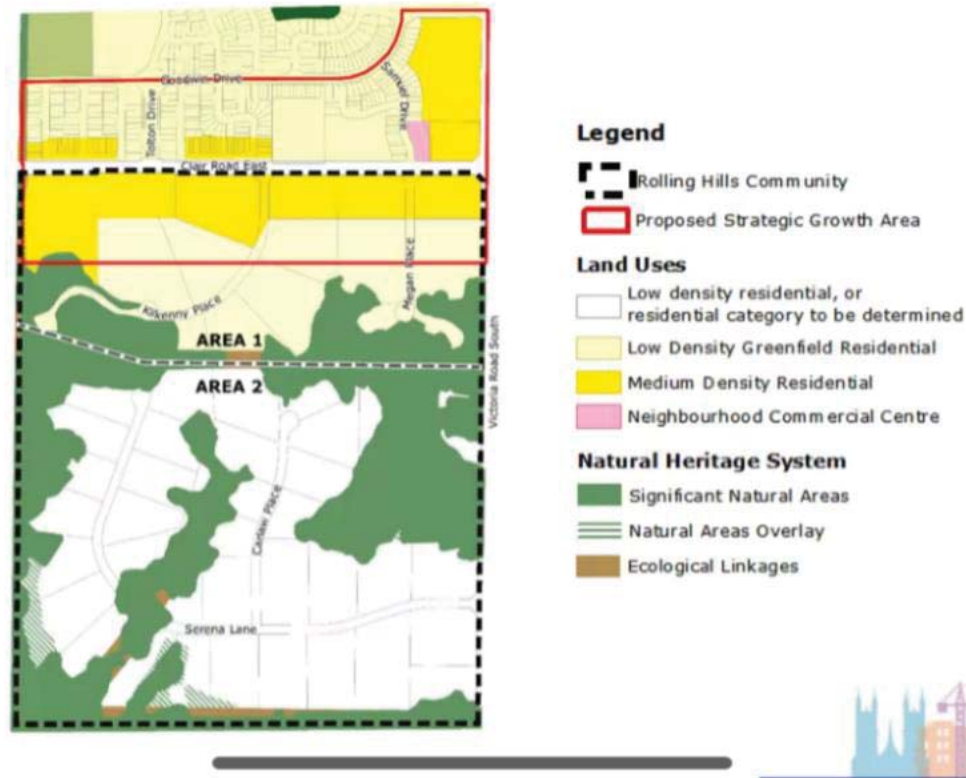
APTG defines Strategic Growth Areas:

Within settlement areas, nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.

An Information Report from City was presented to City Council on April 9, 2021, regarding proposed growth scenarios and urban structure for the City. Figure 3 of City of Guelph Official Plan Review - Urban Structure Technical Brief dated March 2021 (page 153 of the agenda) indicated the area along both sides of Clair Road East roughly between the east side natural area of the Dallen subdivision to Victoria Road South was proposed as a Strategic Growth Area.

The staff/consultant presentation on April 20, 2021, for the Rolling Hills area included the following slide (see below).

Rolling Hills – growth options



This slide shows the Strategic Growth Area including an Area 1 and Area 2 in the Rolling Hills subdivision. The Property (i.e., 331 Clair Road East) lies within Area 1. Area 1 also includes proposed designations of Medium Density Residential on 331 Clair and for other properties general along the south side of Clair Road East. Area 1 also includes proposed Low Density Greenfield Residential designations to the south of the Medium Density Residential area. Area 1 also includes the continued designation of the Significant Natural Areas.

We are in support of the Strategic Growth Area along a portion of Clair Road East and the proposed residential land use designations in Area 1 for the following reasons:

1. **Within the Built-Up Area**

331 Clair and Rolling Hills subdivision have been in the Built-Up Area since the approval of OPA 39 which was delineated under the 2006 Growth Plan for the Greater Golden Horseshoe. The 2008 Local Growth Management Strategy ("LGMS") was the background report for OPA 39. The LGMS contained a map which identified a range of 226 to 489 residential units general in what we are now terming "Area 1" above. Accordingly, Area 1 was considered for growth and intensification as part of the previous conformity exercise.

APTG now requires a minimum of 50 per cent of all residential development occurring annually in the City of Guelph delineated built-up area. The current target in the Official Plan is 40 percent and is to be updated through the Municipal Comprehensive Review.

Intensification of Area 1 along Clair Road East would allow for distribution of growth within other areas of the City and not just along the Gordon Street corridor for instance.

2. **Existing and Proposed Land Use**

The proposed Medium Density and Low Density Greenfield uses in Area 1 would generally be in keeping with the residential uses, density and height established in the Westminster Woods subdivision on the north side of Clair Road East.

3. **Protection of the Natural Heritage System**

The Natural Heritage System in the currently Official Plan between Area 1 and Area 2 would remain protected and act as a buffer and natural separation between proposed residential intensification in Area 1 and the estate residential lots in Area 2. Pedestrian and cycling linkages could be explored to encourage connection between Area 1 and 2, subject to the Natural Heritage System policies in the Official Plan.

4. **Existing and Future Road Network and Bus Routes**

Clair Road East is an Arterial Road in the Official Plan. It is also currently a truck route. It is also ultimately planned to be widened to four (4) lanes with cycling lanes between Dallen Drive and Victoria Road South. Development and intensification along Clair Road East in Area 1 could have direct access to a major transportation route. There is also a current bus route running along Goodwin Drive in proximity to the proposed Strategic Growth Area to the north.

5. **Existing and Future Municipal Infrastructure**

Development could potentially be serviced through existing municipal infrastructure in the Westminster Woods subdivision, as well as future infrastructure to service the broader community including the Clair-Maltby Secondary Plan area.

6. **Proximity to Gordon/Clair node and other amenities**

The Strategic Growth Area is within walking distance of the Gordon/Clair Mixed-use Centre for a range of commercial and services, including a public library. There are also 3 elementary schools within Westminster Woods subdivision as well as a numerous parks and trail system. All of these aspects create a very walkable neighbourhood.

Further we would anticipate further park(s) and common areas to be developed on the south side of Clair Road East in the proposed Strategic Growth Area.

Accordingly, based on the above-noted land use planning background and commentary, we believe the inclusion of a Strategic Growth Area along Clair Road East and the proposed Medium Density Residential and Low Density Greenfield Residential designations in Area 1 are logical and appropriate.


Thank you for the opportunity to comment. I would be happy to meet with City staff to discuss our comments. Should you have any questions in the meantime, I can be reached in our Kitchener office either by email at handy@gspgroup.ca or my direct line at 226-243-7296.

Yours very truly,
GSP Group Inc.

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP
Senior Associate

cc Krista Walkey, City of Guelph
Stacey Laughlin, City of Guelph
Jeff Robinson and Kevin Fergin, 2488995 Ontario Ltd./Reid's Heritage Homes
Pete Graham, GWD Developments Ltd.
Trent Johnson/Eric Davis, Miller Thomson LLP



October 12, 2021

Re: Rolling Hills – Comprehensive Review Process

To: Guelph Review Committee

I am a resident at [REDACTED] and would like to state that I fully **SUPPORT THE STRATEGIC GROWTH PLAN FOR AREA #1 OF ROLLING HILLS** comprehensive review process which is being considered by the City of Guelph and the planning department.

This is an important area which can contribute to the benefit of development for families wishing to locate within the southern corridor of Guelph and is essentially ready for development. The area is changing rapidly and to accommodate the needs of housing in the short-term period it makes sense to provide affordable or reasonably priced homes in the area to meet the needs.

Clair Road will likely be expanded in the near future to a full four lane access road connection to Victoria Road and the city is growing into this direction. Inevitably the city will continue in a cohesive plan to expand, the north side of Rolling Hills is ideally situated to be considered for development to meet those needs. Our carbon footprint can also be better served by intensifying this area and preserving other more sensitive wet lands or other sensitive land masses

Indeed, things have changed and expansion will continue, that cannot be ignored. This area can assist in the plans for expanding Guelph in a responsible or proactive manner.

I understand that the southern portion of Rolling Hills, are to some degree opposing development, although only a handful of vocal opponents exist. If the south area wishes to maintain their status as estate lots, then I am also in support of forgoing a corridor road and preserving this area to accommodate and satisfy those home owners. At the same time, they should recognize the Clair Road Expansion has impacted the north side of Rolling Hills immensely and that we can collectively meet the desired objectives of all owners within Rolling Hills. Obviously, not all home owners will be satisfied and a compromise is likely a good solution.

Please contact me directly at [REDACTED] at any time as I am happy to assist or discuss my support of the Strategic Growth Plan of Rolling Hills area #1.

[REDACTED]



September 23, 2021

Re: Rolling Hills – Comprehensive Review Process

To: Guelph Review Committee

We **fully support the Strategic Growth Area for Rolling Hills Comprehensive Review Process** and would like to participate in the process of redesignating this area for development of medium to low density homes.

The City of Guelph has expanded towards Rolling Hills over the past 23 years as development has migrated towards Clair Road and Rolling Hills. It makes sense to continue south and include area 1 of Rolling Hills for consideration as an area of intensification. When we moved here this road was a gravel and broken asphalt road with green fields and farm lands everywhere. That simply is not what this area is today.

Things change, this area has grown, like it or not, we have accepted those changes over the past 23 years and we firmly believe that the time of change for this area is now. This is not about money-grabbing, this is about allowing this area to grow as the city has grown and allow others to live in this area and to respect those changes. No one likes getting old, but we have to accept those changes and challenges in the same manner, like it or not.

Many people want to live, work, play and live in this area. As growth continues, then we need to respect those needs for others that want to live here. Take the

temple located on Clair Road, I understand that it is desirable to live near and walk to temple, how about others in Guelph looking for homes in the south end of Guelph to raise their families. They too have a strong voice that should be appreciated.

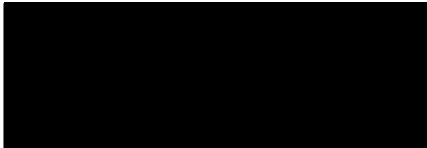
The City Planning Department has done a fabulous job in preparing a cohesive growth strategy plan of incorporate Rolling Hills area #1 as an area which can contribute to the growth of Guelph. The planning department has understood and recognized this area as a normal and proper planning process. They have done their studies understood the need for development and recognized that this area should be considered as THE NEXT LOGICAL STEP OF INTESIFICATION for Guelph as a community and not just of a few. This is for the benefit of Guelph as a whole.

We fully understand that not all neighbors in Rolling Hills agree, however we also support those in Rolling Hills South (AREA #2) to maintain their status as estate lots if they desire. A PERFECT COMPRIMISE perhaps.

If the councillors wish to meet with us personally, we would embrace the opportunity to meet each and every one and to give you a tour of our property to [REDACTED] to have a real visual impact of this area. From [REDACTED] [REDACTED], you can really see the volume of traffic which passes along on Clair Road, you can see the [REDACTED] adjacent just our property, the new temple, the high rise on Gordon and all other development which has taken place. You will also see the land owners adjacent Clair Road all agreeing that these changes have impacted us and that we support those change and wish to be included. This area is the next phase and is no longer the Rolling Hills Area as it was in the past, it has changed.

[REDACTED]

[REDACTED]





October 13, 2021

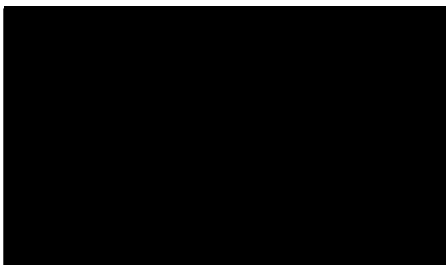
Re: Rolling Hills – Comprehensive Review Process

To: Guelph Review Committee

I fully support the Strategic Growth Area for Rolling Hills Comprehensive Review Process of redesignating this area for development of medium to low density homes.

The City of Guelph has grown towards this area and I recognize that other people would like to live in this area, I have lived here since  with my wife  who recently passed and as life changes, I have made the decision of moving to another area of Guelph which better suits my needs.

I would like to thank those members within the planning department for their hard work to try to promote this area for other residents within Guelph to call this their home in the future.



GWD Developments Ltd.

80 Southgate Drive
Guelph, Ontario N1G 4P5

October 4, 2021

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Submitted via email only to clerks@guelph.ca

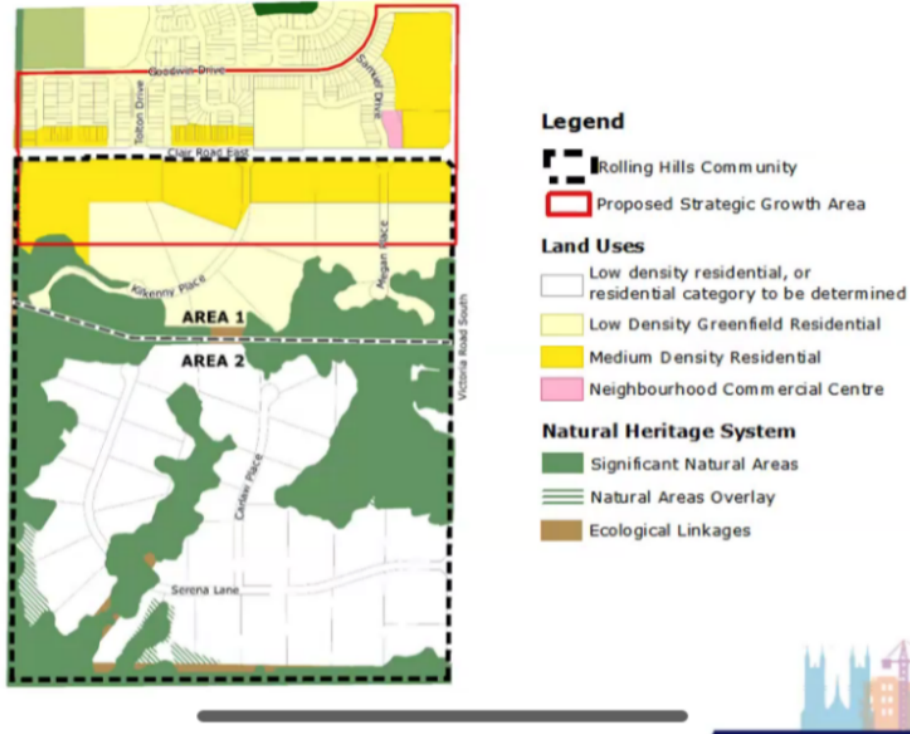
Attention: Mayor Cam Guthrie and Members of Council

**Re: Public Meeting at Council
South Clair Road Neighbourhood Association
Shaping Guelph – Official Plan Update**

I represent the owners of 331 Clair Road (2488995 Ontario Ltd.). Our property has direct access to Clair Road East and our property is not within the Rolling Hills subdivision. Earlier this year, we joined our Rolling Hills neighbours to form the South Clair Road Neighbourhood Association supporting the City's initiative of residential intensification along Clair Road East.

As an owner within both the Strategic Growth Area and Area 1, **we wish to state our support for the Strategic Growth Area as shown for Area 1**. We believe that the city is taking the right approach by dividing Rolling Hills into two areas for the purposes of planning for this area. City staff have found a good balance to proceed forward while being fair and respectful of the concerns expressed by both Area 1 and 2 of Rolling Hills.

Rolling Hills – growth options



As with most city growth, a family farm is purchased by a developer and a subdivision development is built out over time. Area 1 is no different with the evolution of the Hawkins farm from pre-1970s to the sale to Armel and then the development of the Rolling Hills subdivision. In June 2006 the Rolling Hills subdivision was included under the guidelines of the Places to Grow Act as a Built-Up Area. Fast forward to today and the current urban intensification, within the immediate area and within walking distance of Area 1, has been significant. Since my re-involvement in 2011, with our past family property, some of the major built form changes I have seen are:

- Dallon Subdivision - 400+ residential units with up to 6 storey mid-rise buildings along Clair Road
- Guelph Gurdwara - 410 Clair Road East
- Westminster Woods - completion of the community with the development of 4 storey mid-rise buildings with a commercial plaza at Clair and Victoria Road
- Gordon and Clair Commercial Node - Pergola Commons, Longos plaza, Zehrs plaza and another mid-rise residential building

- Completion of Westminster Woods Public School and Orin Reid Park - located 150m from our property
- Clair Road widening permitting designated left and right turn lanes
- Signalized intersection at Clair Road and Victoria Road S.
- Tricar and Thomasfield - mid to high-rise residential buildings along Gordon Street, south of Clair Road.

Therefore, we feel the growth option presented by city staff is a good approach that could potentially be reinforced with site specific policies related to Area 1 in the Official Plan such as;

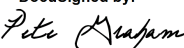
- Provide a transition in density and height between Area 1 and Area 2.
- No vehicular connections be permitted between Area 1 and Area 2.
- New development within Area 1 shall be on full urban municipal services;
- The existing Natural Heritage System shall be protected.
- Any pedestrian and cycling linkages between Area 1 and Area 2 shall be provided in accordance with the Natural Heritage System policies of the Official Plan.
- An Urban-Rural Transition Zone be included in Area 1 along Victoria Road South.

Similar to my Grandfather Hawkins' farming goals, our goals are to continue the stewardship of the land meeting the needs of the community, offering attainable housing while maximizing existing infrastructure and preserving natural heritage.

We urge Council to support the proposed Strategic Growth Area and Low Density Greenfield Residential and Medium Density Residential designations proposed for Area 1.

Thank you for the opportunity to provide these comments. Please provide me with notice of the decision of Council related to the Shaping Guelph Official Plan Update.

Yours truly,

DocuSigned by:

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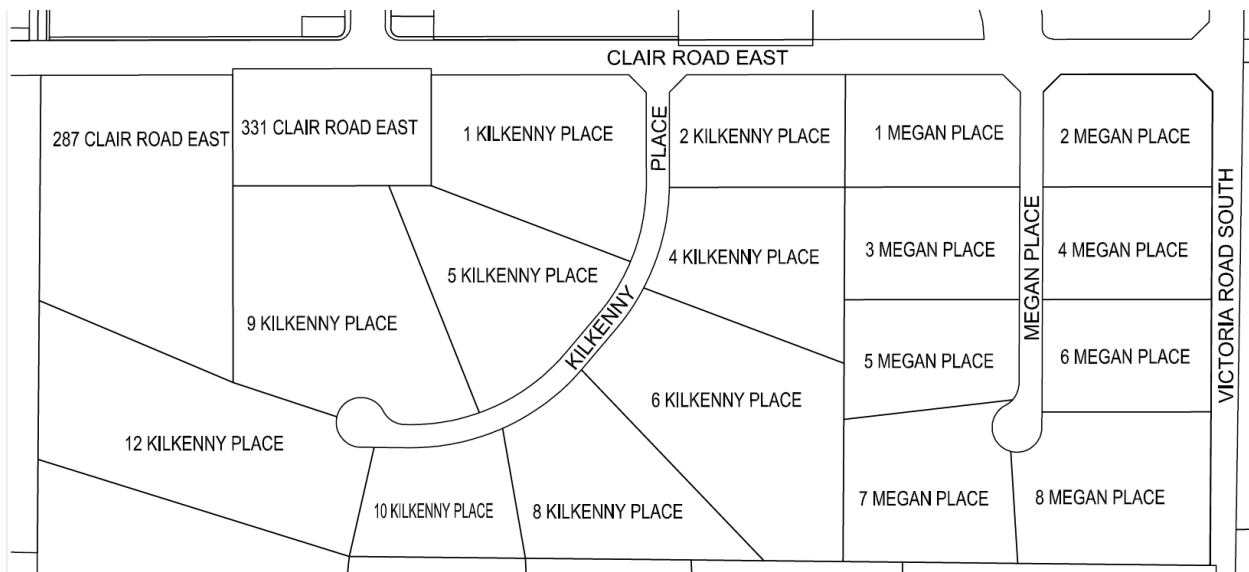
Pete Graham
 GWD Developments Ltd. on behalf of 2488995 Ontario Ltd.
 80 Southgate Drive
 Guelph, ON
 pgraham@gwddevelopments.ca

October 14, 2021

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Mayor Cam Guthrie and Members of Council

As ■ years plus residents of Area one, we wish to state our support of the Proposed Strategic Growth and Low and Medium Density residential designations for area one (based on the map of Rolling Hills showing area one and two.)



We have seen so many changes to our area, such as the development of Clair Rd into a major 4 lane Truck route, the development of all lands on the North side of Clair including 4 story residential and commercial buildings. Our home was once in a country estate subdivision that included quiet, low traffic rural life. This is no longer the case. We think the breaking up of Rolling Hills into two distinct areas with two

distinct entrance methods is a perfect solution for both areas. The area two residents have not had to contend with the development and the changes forced upon area one residents. The entrance off Victoria Rd into Area 2 will allow Area 2 to retain its distinct estate subdivision standing. It seems the perfect solution. Again, we are in complete support of this proposal. We urge all parties to support this proposal.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

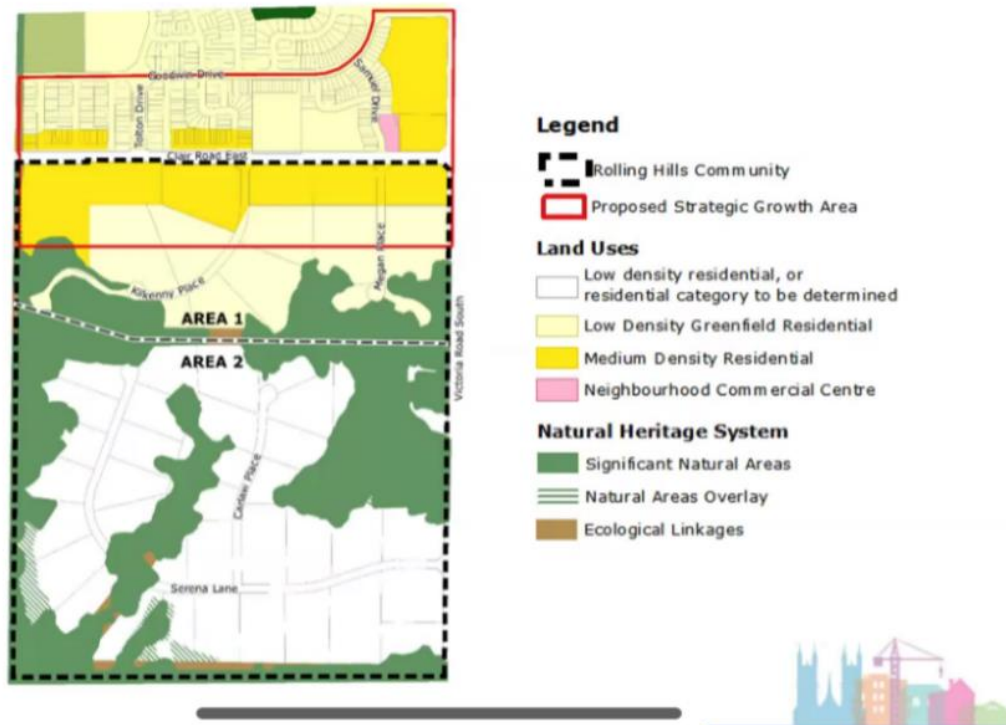
Submitted via email only to clerks@guelph.ca

Attention: Mayor Cam Guthrie and Members of Council

**Re: Public Meeting October, 2021
South Clair Road Neighbourhood Association
Shaping Guelph – Official Plan Update**

On April 20, 2021 Guelph city staff hosted a Virtual Rolling Hills Town Hall - Shaping Guelph meeting which we greatly appreciate. At this meeting a slide was presented showing the Growth Option for Rolling Hills which is included below in this letter. The owners in Area 1 have organized and created the South Clair Neighbourhood Association. As an owner in Area 1, at [REDACTED] I wish to state my support for the Strategic Growth Area identified for Area 1. I am also in support of the Low Density Greenfield Residential and Medium Density Residential designations as shown for Area 1. I believe that the city is taking the right approach by dividing Rolling Hills into two areas for the purposes of planning for this area. City staff have found a good balance to proceed forward while being fair and respectful of the concerns expressed by both areas of Rolling Hills.

Rolling Hills – growth options



My husband and I reside at [REDACTED]. Although we have already made our position and concerns known regarding the redevelopment of the Rolling Hills Subdivision, we are outlining our position once again as we approach the final stages of the decision-making process.

We have resided at [REDACTED] for over twenty years. During that time, we have seen this area of the city grow and develop and morph into a busy corridor. Our house is located at the [REDACTED] [REDACTED]. What was once a quiet neighborhood is now overcome with commercial and retail space, towering condos, and non-stop traffic. We were always aware of the prospect of future development. For the longest time the plan proposed was for low density residential structures not four-story condos towering into our backyard, commercial spaces and now a private school. And that is just the property located across from us. Further up the road we have additional condo complexes, religious establishments along with restaurants and a movie theatre. The city already has a vision for this area and it most definitely NOT preserving or protecting the integrity of the estate lifestyle of Rolling Hills residents. They started down this path years ago and it is unfair to now argue that Rolling Hills must be preserved. Some individuals will argue that Rolling Hills must be saved. You are saving nothing. The idea of the quiet estate lifestyle is no longer a reality. The time for that has long passed. The city needs to finish what they started and complete the development of this area.

I noted that we support the redevelopment of properties along Clair Rd as these are the properties directly impacted by the on-going development and traffic. We appreciate that those properties located in Area 2 are in a different situation from that in which we find our property and therefore we want to be clear that we agree that those residences are not directly impacted and should be preserved. We are seeking redevelopment to reflect the immediate area surrounding us more accurately which is very different to that of Area 2. Our property value has been negatively impacted by the development around us and it is unfair to expect us to accept that as a consequence of decisions we had no part of.

This area is in a prime location of the city. It is the reason why we have seen the development we have thus far. It makes sense to utilize this land for intensification. Living here among the traffic and noise and the daunting physical structure of the condo complex brings home the reality that this is no longer an estate property but rather a property that feels out of place, out of touch and that has outlived its purpose. The land needs to be integrated into the structures that now surround and dominate it.

We also want to make it clear that this has been a difficult situation for us to live with. We built this home on this property with the intention of a quiet lifestyle and to see it altered so dramatically is discouraging. Our children were born and raised here and we have invested money and time to improve our home. This is not a scheme to turn over our property for a quick buck. This is our life and our home we are talking about. We implore you to move forward with the development of the land in question and would respectfully request that our concerns be considered when making your decision.

Sincerely,

[REDACTED]

From: [REDACTED]
Sent: Friday, October 1, 2021 3:15 PM
To: Mayors Office
Subject: Letter from concerned resident

Dear Mayor Guthrie,

City staff has again included Rolling Hills in their development plans and has designated the northern half for intensification. Here are six good reasons why you should vote to exclude Rolling Hills from the city's intensification plans:

- 1) The developer created a legal building scheme when they established Rolling Hills such that the existing covenants do not expire. Every homeowner in Rolling Hills purchased their properties knowing that restrictive covenants apply to this community. Only single dwelling homes can be built on each lot and lots cannot be subdivided.

The city may not have a legal obligation to support these covenants, but I believe, counsellors have a moral obligation to do so. That means, Rolling Hills should not be scheduled for intensification.

- 2) Mark L. Dorfman, Planner Inc. is an urban and environmental planner. He has reviewed the city's own reports and he has concluded that, "The city reports readily admit that there is sufficient existing capacity within the City of Guelph to accommodate the forecasted population growth to 2051, without the need to include Rolling Hills."

In short, the city's own reports say that it can meet its growth requirements using existing undeveloped land without the need to change Rolling Hills.

- 3) You recently announced that the city would try to encourage Moderna to select Guelph as a site for a new manufacturing center. Attracting companies to invest and locate in Guelph, encompasses multiple considerations, including diversity of living options that will attract and retain employees at an executive level. Rolling Hills contributes to Guelph's diversity of living options.
- 4) Ontario has acknowledged the significant importance of the Paris Galt Moraine and plans to protect it by adding it to Ontario's Green Belt. In announcing this move,

Municipal Affairs and Housing Minister, Steve Clark said, “These lands are home to critical groundwater resources that provide drinking water for many communities.”

Rolling Hills sits right on this moraine and development here will have a significant effect on not only Guelph’s water supply, but that of the rest of the province. Guelph needs to follow Ontario’s green initiative and restrict development on the moraine. You can easily do that and preserve the water for the future by rezoning Rolling Hills as estate lots.

- 5) City councilors have a legal obligation to increase tree cover in Guelph. Instead of increasing it to the required target of 40%, it has been decreasing in the last few years to about 28% (2018 data). Robert Pavlis presented a tree canopy report to council showing the significant increase of trees in Rolling Hills as a direct result of planting by homeowners.

The city’s own urban forester said, “As Guelph’s population grows and land is developed, the city is quickly running out of plantable spaces.” (Tribune April 26, 2018). This will not improve with intensification.

What happens to the tree cover in Rolling Hills if you go ahead with rezoning it? “The tree canopy will go from an estimated 65% to 10%”, a devastating loss for the city. You can get a copy of this report by contacting Robert at [REDACTED]

- 6) Redeveloping the northern section would also destroy the southern part of Rolling Hills. The Guelph citizens living in the rest of Rolling Hills will leave the area and sell to developers as soon as the first lot is sold. People live here because they like this community.

It continues to be incredibly sad to have to continue to fight for my family’s rolling hills community. If it was your home and you were in my shoes – what would you do?

Sincerely,

[REDACTED]

[REDACTED]

To: Clerks
Subject: RE: Rolling Hills - Clair-Maltby plan

From: [REDACTED]
Sent: Wednesday, September 29, 2021 9:40 PM
To: Clerks <clerks@guelph.ca>
Subject: Rolling Hills - Clair-Maltby plan

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Dear City Council,

City staff has again included Rolling Hills in their development plans and has designated the northern half for intensification. Here are six good reasons why you should vote to exclude Rolling Hills from the city's intensification plans:

1) The developer created a legal building scheme when they established Rolling Hills such that the existing covenants do not expire. Every homeowner in Rolling Hills purchased their properties knowing that restrictive covenants apply to this community. Only single dwelling homes can be built on each lot and lots cannot be subdivided.

The city may not have a legal obligation to support these covenants, but we believe, councillors have a moral obligation to do so. That means that Rolling Hills should not be scheduled for intensification.

2) Mark L. Dorfman, Planner Inc. is an urban and environmental planner. He has reviewed the city's own reports and he has concluded that, "The city reports readily admit that there is sufficient existing capacity within the City of Guelph to accommodate the forecasted population growth to 2051, without the need to include Rolling Hills."

In short, the city's own reports say that it can meet its growth requirements using existing undeveloped land without the need to change Rolling Hills.

3) Mayor Guthrie recently announced that the city would try to encourage Moderna to select Guelph as a site for a new manufacturing center. Where are the executives of Moderna going to live? If you want big business in Guelph, you need a place like Rolling Hills for their executives to live.

4) Ontario has acknowledged the significant importance of the Paris Galt Moraine and plans to protect it by adding it to Ontario's Green Belt. In announcing this move, Municipal Affairs and Housing Minister, Steve Clark said, "These lands are home to critical groundwater resources that provide drinking water for many communities."

Rolling Hills sits right on this moraine and development here will have a significant effect on not only Guelph's water supply, but that of the rest of the province. Guelph needs to follow Ontario's green initiative and restrict development on the moraine. You can easily do that and preserve the water for the future by rezoning Rolling Hills as estate lots.

5) City councillors have a legal obligation to increase tree cover in Guelph. Instead of increasing it to the required target of 40%, it has been decreasing in the last few years to about 28% (2018 data). Robert Pavlis presented a tree canopy report to counsel showing the significant increase of trees in Rolling Hills as a direct result of planting by homeowners.

We personally [REDACTED] have planted [REDACTED] trees on our [REDACTED] over the last [REDACTED] years. Many of these are now mature and very large.

The city's own urban forester said, "As Guelph's population grows and land is developed, the city is quickly running out of plantable spaces."

(Tribune April 26, 2018). This will not improve with intensification.

What happens to the tree cover in Rolling Hills if you go ahead with rezoning it? "The tree canopy will go from an estimated 65% to 10%", a devastating loss for the city. You can get a copy of this report by contacting Robert at [REDACTED]

6) Redeveloping the northern section would also destroy the southern part of Rolling Hills. The Guelph citizens living in the rest of Rolling Hills will leave the area and sell to developers as soon as the first lot is sold. People live here because they like this community.

Thank you for your hard work on council, and for reading this letter.

[REDACTED]

--

This email has been checked for viruses by AVG.
<https://www.avg.com>

From: [REDACTED]
Sent: Tuesday, October 19, 2021 12:41 PM
To: Jayne Holmes <Jayne.Holmes@guelph.ca>
Subject: Proposed Strategic Growth Area - Clair Road

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Hi Jayne,

Thanks again for the call this morning.

I have attached the graphics that I referenced on our call.

1) Rolling Hills - growth options from the April 20/21 webex Rolling Hills Town Hall meeting labeling Area 1 and 2
My Area 1 neighbours have been submitting letters to Council and staff expressing their support for the redesignation of their properties allowing low to medium density residential. We have support from Area 2 property owners and their letters have been submitted. We have also been in discussion with Guelph Gurdwara representatives at 410 Clair Road (on the north side of Clair Road directly across the street) and they are in support of future residential intensification.

2) Brampton Estate Lot redevelopment example

We thought the attached Brampton example is somewhat applicable to Area 1 and 2. In an effort to strike a compromise similar Brampton planning policies could be implemented:

- provide a gradual and sensitive transition in density (City graphic shows medium density along Clair Road with low density residential further away from Clair Road transitioning to Area 2 where the land use could be considered estate lot residential.
- provide a diverse range and mix of housing options - attainable housing choices
- no vehicular connections between Area 1 and 2.
- that the extension of Serena Lane and Carlaw Place shall be prohibited
- that vehicular access to and from Area 2 will be from Victoria Road
- that Area 1 development shall be on full urban municipal services
- that the existing Natural Heritage System shall be protected and enhanced
- any pedestrian and cyclist linkages between the NHS (connecting Area 1 and 2) be provided where it has been demonstrated that the functions of NHS will not be adversely impacted

3) CMSP proposed collector road connecting to Rolling Hills Area 2 land

In order to preserve Area 2 and similar to the above suggestions, maybe the proposed collector road connection from CMSP to Area 2 be removed. We have discussed what the impact the removal of this proposed collector road connection would have on the surrounding arterial roads i.e. Victoria Rd and Gordon St, at full build-out, and according to our traffic engineer the vehicular impact to these arterial roads would be minimal.

I do think a meeting with the property owners, that are supportive of redesignating their properties, would be beneficial to both Council and staff. All the property owners that either directly front or side onto Clair Road support the redesignation of their properties. 12 of the 19 property owners within Area 1 are

supportive of the redesignation. I would suggest having the meeting outside at 331 Clair Road. Please let me know if that works.

Thank you,

[REDACTED]

From: [REDACTED]
Sent: Monday, November 15, 2021 8:40 PM
To: Krista Walkey <Krista.Walkey@guelph.ca>; Clerks <clerks@guelph.ca>; Stacey Laughlin <Stacey.Laughlin@guelph.ca>; Dan Gibson <Dan.Gibson@guelph.ca>; Bob Bell <Bob.Bell@guelph.ca>; James Gordon <James.Gordon@guelph.ca>; Rodrigo Goller <Rodrigo.Goller@guelph.ca>; Phil Allt <Phil.Allt@guelph.ca>; June Hofland <June.Hofland@guelph.ca>; Mike Salisbury <Mike.Salisbury@guelph.ca>; Christine Billings <Christine.Billings@guelph.ca>; Leanne Caron <Leanne.Caron@guelph.ca>; Cathy Downer <Cathy.Downer@guelph.ca>; Mark MacKinnon <Mark.MacKinnon@guelph.ca>; Dominique O'Rourke <Dominique.ORourke@guelph.ca>; ssnider@tmalaw.ca <:ssnider@tmalaw.ca>; Astrid Clos <astrid.clos@ajcplanning.ca>
Subject: FW: Comprehensive Review Process

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Sent from [Mail](#) for Windows

From: [REDACTED]
Sent: November 11, 2021 10:06 PM
To: [REDACTED]
Subject: Comprehensive Review Process

Re: Rolling Hills

To: Guelph Review Committee

My wife and I are the newest residents in The Rolling Hills area residing at [REDACTED]. We found out shortly after we purchased the property on [REDACTED] that this proposal was put forth with plans to expand and possibly rezone Area 1 of Rolling Hills and from what I can see this does include our street, [REDACTED]. Since we are situated in Area 1 we are aware that this change would have a direct impact on us, but that could also be in a positive way. We have currently lived in the South end of Guelph for the past [REDACTED] years and have seen our past streets where we lived get chopped up into smaller lots in order to provide more affordable housing for people who want to live or relocate to the south end of Guelph since . (Dawn Ave /Lowes rd). Area 1 has so much potential for expansion with such vast lots (acres) and would fit in directly with what's already happened across the street all along Clair rd. The market has changed so drastically over the past few years that there simply isn't enough housing for the demand, especially in the south end. We have seen house prices rise so quickly that it has basically priced my three children out of affordable housing and for them to enter the market at a reasonable cost, so allowing this proposal to move forward would also allow for more affordable units to be built in the surrounding area thus giving a lot of younger families the opportunity to start their lives in the south end of Guelph. This would also give the opportunity for current home owners in the Rolling Hills area to provide lots for their own children or even developers to add more affordable housing throughout the south end. My wife and I have discussed this new proposal in depth and would be in Support as long as all of Area 1 is included in the strategic growth plan which would also include the mid and low density in the Greenfields residential designations as shown in Area 1.

Thank you,

[REDACTED]

[REDACTED]

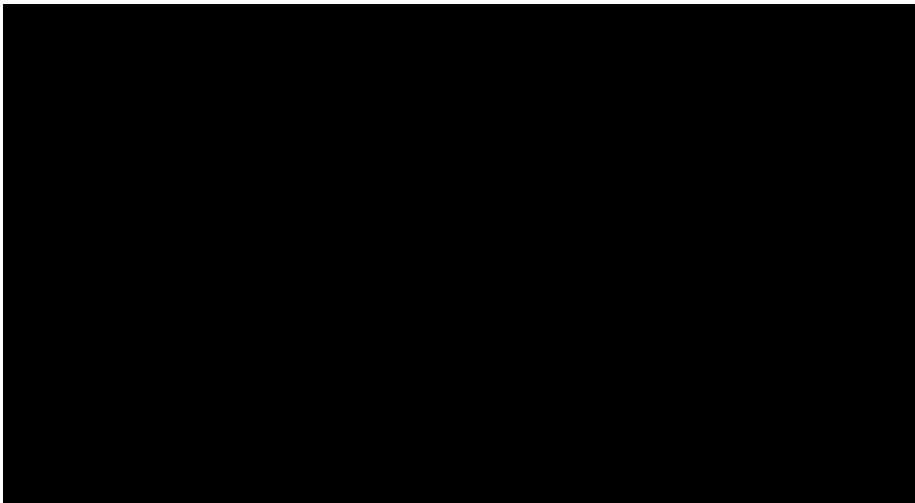
From: [REDACTED]
Sent: Thursday, October 14, 2021 2:50 PM
To: Clerks; Krista Walkey; Stacey Laughlin; Mayors Office; Dan Gibson; Bob Bell; James Gordon; Rodrigo Goller; Phil Allt; June Hofland; Mike Salisbury; Christine Billings; Leanne Caron; Cathy Downer; mark.mackinnin@guelph.ca; Dominique O'Rourke; ssnider@tmalaw.ca; astrid.clos@ajcplanning.ca
Cc: [REDACTED]
Subject: FW: rolling hills

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Good afternoon,

I am forwarding this letter on behalf of [REDACTED] who resides at [REDACTED], Guelph (part of the Rolling Hills Subdivision - Area 2). [REDACTED] also wishes to voice her support in favor of development in Area 1 and as such has provided the following letter.

Sincerely,
[REDACTED]



[REDACTED]
Sent: Wednesday, October 13, 2021 6:45 PM
[REDACTED]
Subject: FW: rolling hills

October 13, 2021

Guelph City Hall

1 Carden Street

Guelph, Ontario

N1H 3A1

Submitted via email only to clerks@guelph.ca

Attention: Mayor Cam Guthrie and Members of Council

Re: Public Meeting October, 2021

South Clair Road Neighbourhood Association

Shaping Guelph – Official Plan Update

On April 20, 2021 Guelph city staff hosted a Virtual Rolling Hills Town Hall – Shaping Guelph meeting which we greatly appreciate. At this meeting a slide was presented showing the Growth Option for Rolling Hills which is included below in this letter. The owners in Area 1 have organized and created the South Clair Neighbourhood Association. **As an owner in Area 2**, at [REDACTED], Guelph, Ontario I wish to state my **support** for the Strategic Growth Area identified for **Area 1**. I am also in support of the Low Density Greenfield Residential and Medium Density Residential designations as shown for Area 1. I believe that the city is taking the right approach by dividing Rolling Hills into two areas for the purposes of planning for this area. City staff have found a good balance to proceed forward while being fair and respectful of the concerns expressed by both areas of Rolling Hills.

Area 1 has been identified within the Built-Up Area since June 16, 2006 by the province and the Guelph Official Plan identifies the Built-Up Area as a location to direct intensification. The proposed designations along the south side of Clair Road East are not high density designations nor are they part of an intensification corridor. The proposed designations will introduce “gentle density” along Clair Road as per the notion introduced by Jennifer Keesmaat in her remarks at the initiation of the Shaping Guelph process. This “gentle density” will be compatible with the Westminster Woods community and the Rolling Hills Area 2 community.

Area 1

Area 1 can be distinguished from Area 2 in that Area 1 abuts Clair Road and all the changes that have occurred along this transportation corridor over the past twenty years. The Clair Road frontage has now been almost entirely developed by employment uses, commercial development and residential development with the exception of the South Clair Road Neighbourhood Association lands. Area 1 has been directly exposed to the 4 lanes of traffic on Clair Road as this portion of the city has been developed.

Area 1 is also directly adjacent to the development of the Dallan lands and the Westminster Woods lands. The existing road network of Area 1 (ie. Kilkenny Place and Megan Place) have direct access to Clair Road East. The development of Area 1 will not add any additional traffic or disruption on the local residential streets located in Area 2. There is a distinct natural heritage area acting as a buffer between Area 1 and Area 2 which must be maintained in accordance with the current Official Plan policies. There will be no development “creep” into Area 2 if policies are included within the Official Plan to recognize Area 2 as a stable residential area if the owners in Area 2 would support such a policy.

The growth option presented by city staff is a good approach that could potentially be reinforced with site specific policies related to Area 1 in the Official Plan such as;

- Provide a transition in density and height between Area 1 and Area 2.
- No vehicular connections be permitted between Area 1 and Area 2.
- New development within Area 1 shall be on full urban municipal services;
- The existing Natural Heritage System shall be protected.

- Any pedestrian and cycling linkages between Area 1 and Area 2 shall be provided in accordance with the Natural Heritage System policies of the Official Plan.
- An Urban-Rural Transition Zone be included in Area 1 along Victoria Road South.

As an **owner in Area 2**, I wish to state my **support** of the proposed Strategic Growth Area and Low Density Greenfield Residential and Medium Density Residential designations proposed for Area 1. I urge Council to support this as has been presented by city staff.

Thank you for the opportunity to provide these comments. Please provide me with notice of the decision of Council related to the Shaping Guelph Official Plan Update.

Yours truly,

[REDACTED]

[REDACTED] Guelph, Ontario

October 8, 2021

Guelph City Hall 1 Carden St Guelph, ON N1H 3A1

Attention: Mayor Cam Guthrie and Members of Council

RE: Public Meeting

South Clair Road Neighborhood Association Shaping Guelph Official Plan Update

Greetings,

My name is [REDACTED] We chose Guelph as our permanent residence short after starting [REDACTED]. Near two decades living in this beautiful, vibrant city made me shift from [REDACTED]. I revitalized numerous buildings in Downtown Guelph each been admired by citizens and city officials they met me. Now Guelph is my city and not only I am thinking of myself and my family but, any family is considered as a member of bigger family we call our city.

We moved to [REDACTED] in 2015, living in this area became our dream home for our generation to come. When first Clair- Maltby plan was introduced few years ago, we were thinking of no way to support it. When Covid-19 hit the world, the crisis our country and world faced provided opportunity to think another way and that was availability of necessities to all not us. Area 1 which is also called south of Clair Road consists of more than 80 acres of Land and 17 families. The average of a family in each residence makes 3. It means 51 people live on 80 Acres, more than 1.5acre/person.

Lack of house inventory pushed the housing price to the unaffordable price. Availability of significant development land in the area that entire north side of it has been developed creates opportunity for cohesive, high, medium and low density residential which support the demand of housing market, municipal and provincial mandates for years to come.

While we really enjoy our home and natural environment we think it is pushing the limit of exclusivity further than it should be. My wife, [REDACTED] and I STRONGLY SUPPORT the strategic plan in which area one become included in the planning program to intensify density in the said area.

We suggest to address the concern of residences of Serina lane the plan include the north of Rolling Hills or South of Clair Road East for now if the majority of house owners in Kilkenny and Megan place SUPPORT the future development.

A message to the respected Counselors: Please consider this matter as the city matter not a neighborhood matter if the majority of a neighborhood willing to join the city matter.

With due respect,

[REDACTED]

From: [REDACTED]
Sent: Monday, December 6, 2021 10:04 PM
To: Plan2051
Cc: Clerks
Subject: Fwd: Ontario Supports Future Development of New Homes in Guelph

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Good morning Natalie,

Well this is certainly great news for the city of Guelph. Now that the Dolime annexation is approved, the Families for Rolling Hills group is hoping any redevelopment of the south side of Clair Rd East (apart from 331 Clair Rd East) will be taken off the preferred urban structure. As I'm hoping you are aware, we would like to be recognized in the zoning for what we are and that is estate residential.

Thanks

[REDACTED]

[REDACTED]

NEWS RELEASE

Ontario Supports Future Development of New Homes in Guelph

Minister's Zoning Order responds to City's request and will help add to the supply of new housing while protecting City's drinking water supply

December 06, 2021

[Ministry of Municipal Affairs and Housing](#)

GUELPH — The Ontario government is using a Minister's Zoning Order (MZO) to help lay the groundwork for much-needed housing in the City of Guelph, while protecting the City of Guelph's drinking water supply for years to come.

The Minister of Municipal Affairs and Housing has granted Guelph City Council's request for an MZO, which enables homes to be built faster on the site of the Dolime Quarry lands in the Township of Guelph/Eramosa. Guelph's City Council passed a council resolution requesting this MZO on July 19, 2021, following several years of public consultation.

"Young families, seniors and all hardworking Ontarians are desperate for housing that meets their needs and budget. As Ontario enters a period of economic recovery, we are working hard to protect our progress and increase the supply of housing our province needs," said Steve Clark, Minister of Municipal Affairs and Housing. "I'm proud to grant the City of Guelph's request for a Minister's Zoning Order to help build more homes faster, all while protecting the drinking water for the people of Guelph and Eramosa."



Ontario is balancing responsible growth with protecting the environment for future generations. This MZO will also protect sensitive groundwater beneath the Dolime Quarry lands, from which the City draws its drinking water.

The Minister has also approved the City of Guelph and Township of Guelph/Eramosa's proposal to transfer jurisdiction of the quarry lands to the City from the Township. The annexation of the Dolime lands is part of a quarry rehabilitation initiative to protect drinking water, following several years of public consultation by the municipalities. The annexation and MZO will come into effect on January 1, 2022. "Every step we've made toward protecting our community's drinking water has felt like progress, but this one is the big one," said Guelph Mayor Cam Guthrie. "I want to thank Minister Steve Clark for upholding our community-supported solution to a complex problem. The approval of our requests makes the province's commitment to addressing drinking water protection loud and clear, and also, over the longer term, supports the need to address the housing crisis our province faces."

Everyone has a role to play in fixing Ontario's housing crisis. Ontario will continue to work with municipal partners to help them use the tools the province has provided to unlock housing and make finding a home more affordable for hardworking Ontarians. This includes working with municipalities through the upcoming Provincial-Municipal Housing Summit and a special session with rural municipalities leading up to the Rural Ontario Municipal Association (ROMA) conference in January 2022.

Quick Facts

- The Minister's Zoning Order comes into effect on January 1, 2022, the same day as the restructuring order for the Township of Guelph/Eramosa and the City of Guelph.
- Future development of the quarry site would involve additional future public consultation.

Media Contacts

Zoe Knowles

Minister's Office

Zoe.Knowles@ontario.ca

Conrad Spezowka

MMAH Communications Branch

mma.media@ontario.ca

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October 11, 2021

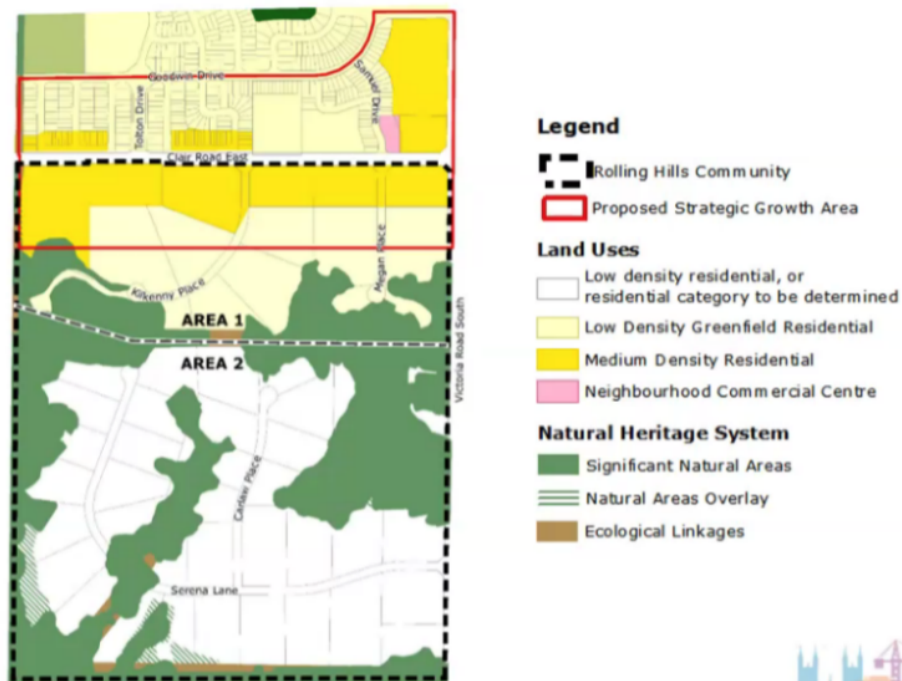
Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Mayor Cam Guthrie and Members of Council

**Re: Public Meeting at Council
South Clair Road Neighbourhood Association
Shaping Guelph – Official Plan Update**

On April 20, 2021 Guelph city staff hosted a Virtual Rolling Hills Town Hall - Shaping Guelph meeting which we greatly appreciate. At this meeting a slide was presented showing the Growth Option for Rolling Hills which is included below in this letter. The owners in Area 1 have organized and created the South Clair Road Neighbourhood Association. As an owner in Area 1, at [REDACTED] I wish to state my support for the Strategic Growth Area identified for Area 1. I am also in support of the Low-Density Greenfield Residential and Medium Density Residential designations as shown for Area 1. I believe that the city is taking the right approach by dividing Rolling Hills into two areas for the purposes of planning for this area. City staff have found a good balance to proceed forward while being fair and respectful of the concerns expressed by both areas of Rolling Hills.

Rolling Hills – growth options



We have moved to [REDACTED]. We truly like our new house and area and are enjoying the quiet nature and environment. Shortly after moving to this area, we learned that there is a possibility that the side of Rolling hill that our house is located may be in the city's future development. My wife ! ([REDACTED]) and I had significant discussion on the need of a city to provide housing for its citizen and the right of an owner to enjoy a quiet environment. Both of us do care deeply about environment and our environmental footprint in this world.

While we are enjoying leaving in nearly [REDACTED] of land with significant amount of landscaping, we are also acutely aware that this is a huge privilege to have for only 3 people. We know that this is not an environmentally friendly lifestyle and not a green way of thinking. No matter how selfish we might be, we cannot deny that there is only one earth and every single citizen have the same environmental right that we do. If the city can house many more people in our property via high density, this would be a huge benefit to the environment and would have significantly less impact on our climate (impact on environment/household). That is exactly why, as an owner in Area 1 and part of the South Clair Road Neighbourhood Association, I wish to state my support of the proposed Strategic Growth Area and Low-Density Greenfield Residential and Medium Density Residential designations proposed for Area 1.

We strongly urge Council to support this as has been presented by city staff to have a more environmentally friendly, equitable and fair living spaces for Guelph citizens.

Thank you for the opportunity to provide these comments. Please provide me with notice of the decision of Council related to the Shaping Guelph Official Plan Update.

Sincerely Yours,

[REDACTED]

October 13, 2021

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Submitted via email only to clerks@guelph.ca

Attention: Mayor Cam Guthrie and Members of Council

Re: **Public Meeting at Council**
South Clair Road Neighbourhood Association
Shaping Guelph – Official Plan Update

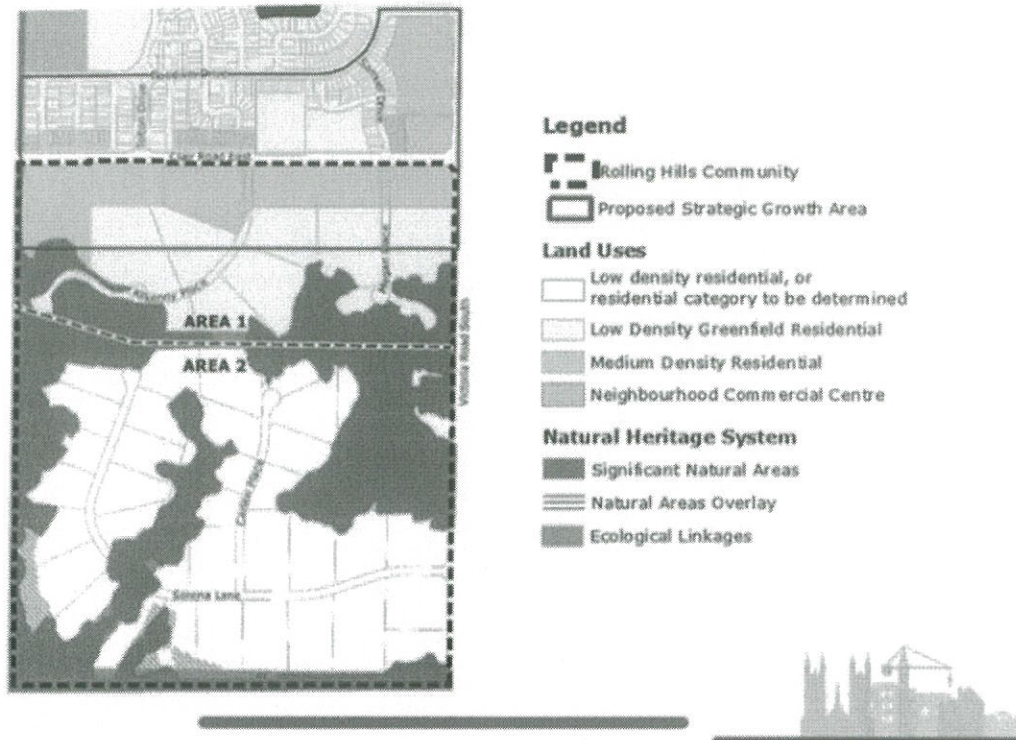
My name is [REDACTED] and my wife and I live at [REDACTED] in the Rolling Hills subdivision. I have lived in this home for 21 years and have raised our family here. My property is located in Area 2 as labeled on the Rolling Hills, growth options plan - please see below.

As an owner within Area 2, **we wish to state our support for the Strategic Growth Area as shown for Area 1.** We believe that the city is taking the right approach by dividing Rolling Hills into two areas for the purposes of planning for this area. City staff have found a good balance to proceed forward while being fair and respectful of the concerns expressed by both Area 1 and 2 of Rolling Hills.

As a local business owner and a life-time Guelph resident, I have experienced the significant changes in Guelph's south end. I really do believe City staff should finish what they have started and allow the completion of residential and/or commercial intensification along Clair Road East. I couldn't agree more with City staff that the proposed strategic growth area along the south side of Clair Road should be the next focus area for development.

I also understand the need for attainable housing in Guelph, especially in the south end. Guelph has, and rightly so, invested in the Hanlon Creek business park which now attracts much needed businesses to our community. We have an opportunity to provide a range of housing choice and tenure for employees, employers and their families to be able to live, work and play within Guelph's south end. Townhomes, stacked townhomes and apartments are the missing middle and are just what we need.

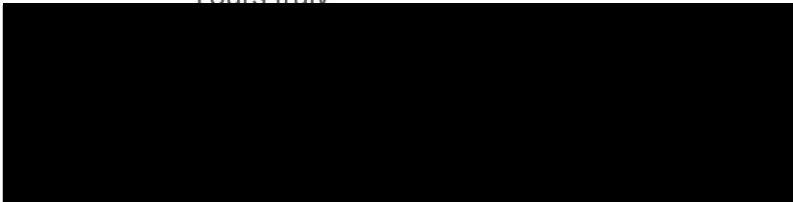
Rolling Hills – growth options



I recognize that any development within Area 1 will not impact my property and my lifestyle. I do support the preservation of Area 2 and the removal of any proposed collector road from the Clair Maltby Secondary Plan into Area 2. The existing Natural Heritage System feature should be protected thereby eliminating any requirement for a future road connection between Area 1 and 2. Lastly, any new development within Area 1 should be connected to full City municipal services.

Thank you for the opportunity to provide these comments.

Yours truly,



October 3, 2021

Guelph City Hall
1 Carden St
Guelph, ON
N1H 3A1

Attention: Mayor Cam Guthrie and Members of Council

**RE: Public Meeting
South Clair Road Neighbourhood Association
Shaping Guelph Official Plan Update**

As a [REDACTED] year resident of Guelph, a south Guelph resident, a local developer and a Rolling Hills property owner [REDACTED] within Area 1 – I wish to state my **SUPPORT** of the Proposed Strategic Growth Area and Low Density and Medium Density residential designations proposed for Area 1. I urge council to support this as has been presented by city staff.

Guelph, along with many other cities, is facing a housing crisis of both affordability and lack of supply.

Area 1 is located within the built-up area. Based on the Provincial “Places to Grow” policies – Guelph must add 50% of its population growth within its built-up area. Area 1 represents probably the single largest intensification opportunity to add housing to the city’s built-up area. If we pass on this opportunity, it will add an additional burden to every other neighbourhood that must then bear a disproportionate share of Guelph’s infill housing development.

This intensification opportunity will bring development on municipal services to Area 1 which is an improvement from a Source Water Protection perspective.

The development of Area 1 would be an efficient use of city infrastructure – including roads, sewers, water, hydro, while supporting the existing schools, parks, trails, and the commercial node – and would allow for public transit supportive housing on an arterial road.

The proposed “gentle density” along the south side of Clair Rd would help relieve some of the development on Gordon St and other parts of the city. It would be compatible with the existing development on the north side of Clair Rd as well as Area 2.

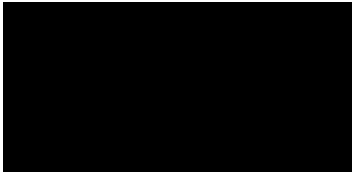
City staff is taking the correct approach in dividing Rolling Hills into two distinct areas. Area 1 (Kilkenny and Megan) has direct access to Clair Rd. Development within Area 1 will not add any additional traffic to Area 2 – there are no connecting roads between the two areas. They are separated by a wide natural heritage corridor that must remain and be protected and acts as an excellent natural buffer between the two areas.

Many of the residents in Area 1 (South Clair Road Neighbourhood Association) that are in support of the Strategic Growth Area are long time residents that have watched their large rural lots change from access to a two-lane gravel road to become a 4-lane truck route.

We do understand the perspective of the residents in Area 2. However, they would not be subject to any changes in their existing traffic volume since their neighbourhood would continue to be accessed via Victoria Rd and would have no additional development or thru roads. Area 2 could be offered further protections against development with the addition of policies in the Official Plan recognizing Area 2 as a “unique residential neighbourhood” if Area 2 residents wanted to support such a designation.

I urge council to support the Strategic Growth Area as has been presented by city staff.

Thank you for the opportunity to provide these comments. Please provide me with notice of the decision of Council related to the Shaping Guelph Official Plan update.



October 8, 2021

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

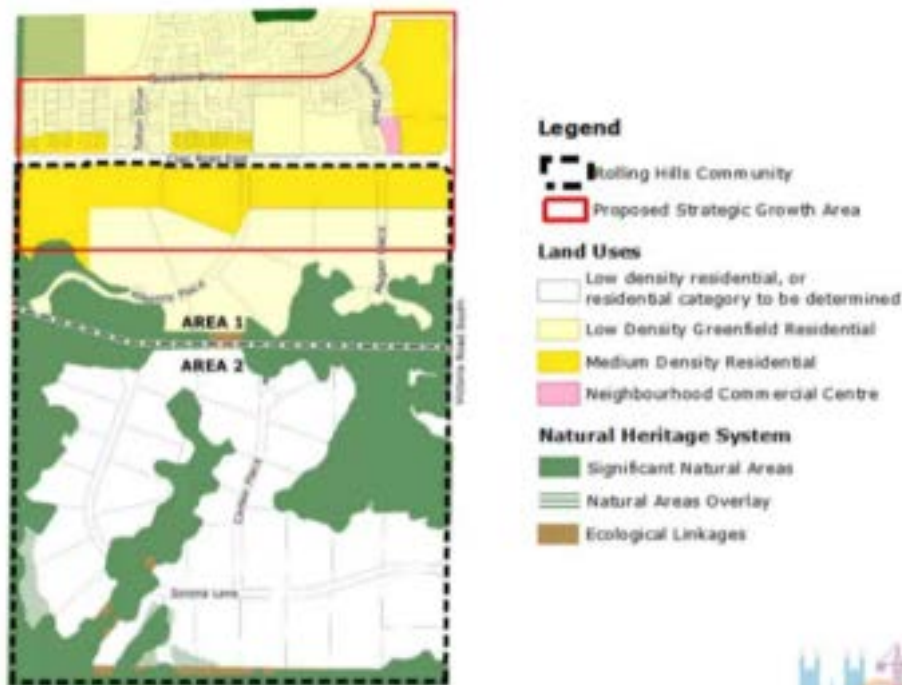
Submitted via email only to clerks@guelph.ca

Attention: Mayor Cam Guthrie and Members of Council

Re: Public Meeting October, 2021
South Clair Road Neighbourhood Association
Shaping Guelph – Official Plan Update

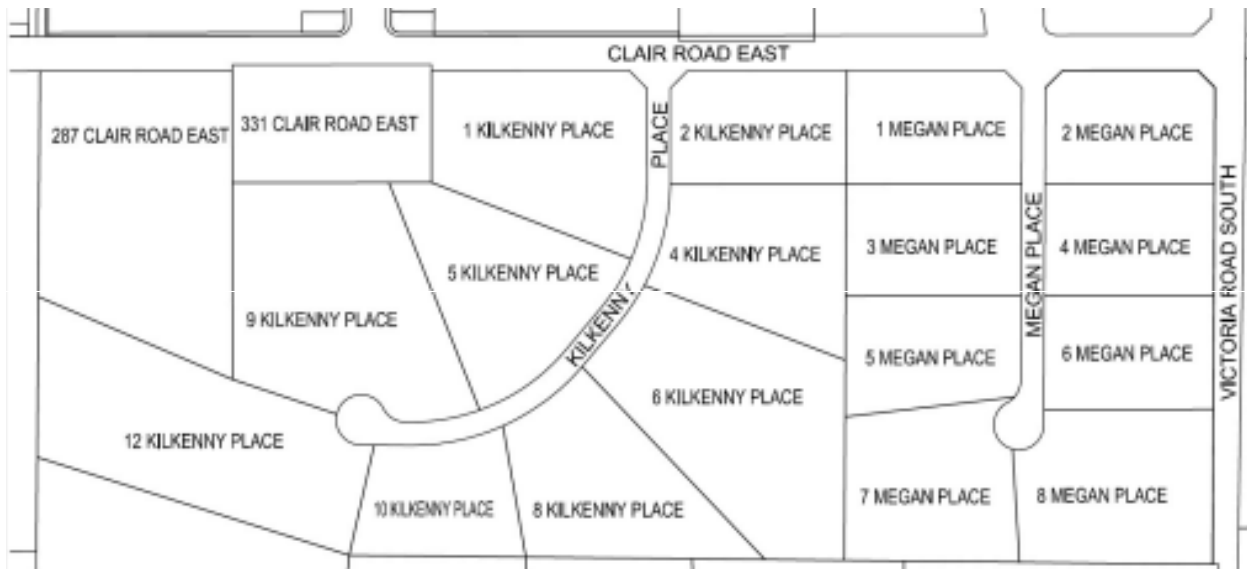
On April 20, 2021 Guelph city staff hosted a Virtual Rolling Hills Town Hall - Shaping Guelph meeting which we greatly appreciate. At this meeting a slide was presented showing the Growth Option for Rolling Hills which is included below in this letter. The owners in Area 1 have organized and created the South Clair Neighbourhood Association. As an owner in Area 1, at [REDACTED] I wish to state my **support** for the Strategic Growth Area identified for Area 1. I am also in support of the Low Density Greenfield Residential and Medium Density Residential designations as shown for Area 1. I believe that the city is taking the right approach by dividing Rolling Hills into two areas for the purposes of planning for this area. City staff have found a good balance to proceed forward while being fair and respectful of the concerns expressed by both areas of Rolling Hills.

Rolling Hills – growth options



Area 1 has been identified within the Built-Up Area since June 16, 2006 by the province and the Guelph Official Plan identifies the Built-Up Area as a location to direct intensification. The proposed designations along the south side of Clair Road East are not high density designations nor are they part of an intensification corridor. The proposed designations will introduce “gentle density” along Clair Road as per the notion introduced by Jennifer Keesmaat in her remarks at the initiation of the Shaping Guelph process. This “gentle density” will be compatible with the Westminster Woods community and the Rolling Hills Area 2 community.

Area 1



Area 1 can be distinguished from Area 2 in that Area 1 abuts Clair Road and all the changes that have occurred along this transportation corridor over the past twenty years. The Clair Road frontage has now been almost entirely developed by employment uses, commercial development and residential development with the exception of the South Clair Road Neighbourhood Association lands. Area 1 has been directly exposed to the 4 lanes of traffic on Clair Road as this portion of the city has been developed.

Area 1 is also directly adjacent to the development of the Dallen lands and the Westminster Woods lands. The existing road network of Area 1 (ie. Kilkenney Place and Megan Place) have direct access to Clair Road East. The development of Area 1 will not add any additional traffic or disruption on the local residential streets located in Area 2. There is a distinct natural heritage area acting as a buffer between Area 1 and Area 2 which must be maintained in accordance with the current Official Plan policies. There will be no development “creep” into Area 2 if policies are included within the Official Plan to recognize Area 2 as a stable residential area if the owners in Area 2 would support such a policy.

-3-

The growth option presented by city staff is a good approach that could potentially be reinforced with site specific policies related to Area 1 in the Official Plan such as;

- Provide a transition in density and height between Area 1 and Area 2.
- No vehicular connections be permitted between Area 1 and Area 2.

- New development within Area 1 shall be on full urban municipal services;
- The existing Natural Heritage System shall be protected.
- Any pedestrian and cycling linkages between Area 1 and Area 2 shall be provided in accordance with the Natural Heritage System policies of the Official Plan.
- An Urban-Rural Transition Zone be included in Area 1 along Victoria Road South.

As an owner in Area 1 and part of the South Clair Road Neighbourhood Association, I wish to state my **support** of the proposed Strategic Growth Area and Low Density Greenfield Residential and Medium Density Residential designations proposed for Area 1. I urge Council to support this as has been presented by city staff.

Thank you for the opportunity to provide these comments. Please provide me with notice of the decision of Council related to the Shaping Guelph Official Plan Update.

Yours truly,

A black rectangular redaction box covering the signature area.

RE: Clair-Malty Secondary Plan - in defense of leaving Rolling Hills out of it

From: [REDACTED]
Sent: Sunday, October 3, 2021 12:01 PM
To: Mayors Office <Mayor@guelph.ca>
Subject: Clair-Malty Secondary Plan - in defense of leaving Rolling Hills out of it

[EXTERNAL EMAIL] Do not click links or attachments unless you recognize the sender and know the content is safe.

Dear Mr. Mayor and City Counsellors

Our family has lived in Rolling Hills at [REDACTED] have lived their entire lives at this home and [REDACTED] have benefited from semi-rural living that the Rolling Hills subdivision affords us. It is home. It has always been home to our family and we are emphatically against any change to the environment in which we have chosen to live.

When we bought the land, there were restrictive covenants in place as to what we could build, how far away we had to be from our neighbours, how large our home was required to be and only one home was allowed to be on our lot. I understand that the City can legally overrule these restrictive covenants but I believe that morally they should uphold them. Densifying this area would be a mistake.

When we built our home, we were extremely careful about preserving as many of the old trees as possible on our land and we have continued to do what we can to make sure those trees thrive. Additionally, we have planted many other trees to add to the beauty and add to the ecologically important tree cover. The City of Guelph has a legal obligation to increase tree cover to 40%, however in the last few years it has decreased to approx. 28% (2018 data). According to Robert Pavlis, as a direct result of planting by homeowners the tree canopy in Rolling Hills currently sits at 65%. If Rolling Hills is rezoned this precious tree canopy is estimated to drop to 10%. The city will quickly run out of plantable spaces if they continue this trend. To acquire a copy of the tree canopy report please contact [REDACTED]

Densifying and rezoning Rolling Hills will have a detrimental effect on the Paris-Galt Moraine and our City's (and many other communities in our province), very important and significant water supply. Guelph needs to follow Ontario's Green Initiatives and restrict development on the Moraine. Cease densification plans to Rolling Hills and protect our water supply for the future!

Mark Dorfman, Planner Inc. is an urban and environmental planner. He has reviewed the City's own reports and he has concluded that "the City reports readily admit that there is sufficient existing capacity within the City of Guelph to accommodate the forecasted population growth to 2051, without the need to include Rolling Hills". Why then, if the City has concluded that it can meet its growth requirements using existing undeveloped land, would it need to upset the status quo in Rolling Hills?

Rolling Hills is a unique and vibrant estate subdivision. There is nothing else like it in Guelph. Families who have bought land here and built homes tend to stay. We like the lifestyle, we love the land and we have invested heavily in creating homes for our families. We are also well aware of the privilege of being stewards of this special area of Guelph and take very seriously the responsibility of preserving it. We believe the entire Rolling Hills subdivision should be left out of the City plans for densification.

We respectfully request that you vote against including Rolling Hills in the City's densification plans of the Clair-Maltby area.

Respectfully,

[REDACTED]

SOUTH CLAIR ROAD NEIGHBOURHOOD ASSOCIATION

December 10, 2021

Guelph City Hall
1 Carden St
Guelph, Ontario
N1H 3A1

Attention: Mayor Cam Guthrie and Members of Council

RE: **Public Meeting - Shaping Guelph Official Plan Update**
South Clair Road Neighbourhood Association

The South Clair Road Neighbourhood Association (Area 1 of Rolling Hills) retained a lawyer to provide legal advice with respect to the restrictive covenant issue. A summary of these findings is outlined below;

- The restrictive covenants commenced to be registered on individual lots in 1987 when Rolling Hills was located within the Township of Puslinch and the County of Wellington. It was not until 1993 that Rolling Hills was annexed into the City of Guelph.
- There is no consistency with respect to the restrictive covenants registered on the Rolling Hills lots. There are at least 3 different versions of the restrictive covenants and many Rolling Hills lots have no restrictive covenant registered at all on their lot.
- Restrictive covenants may only be enforced by another landowner specifically benefitting from the restrictive covenant through a court challenge. There is no consistency in the wording of the restrictive covenants with respect to which other lots benefit and may, therefore, enforce the restrictive covenants.
- Some of the restrictive covenants benefit only the developer Armel. If Armel does not retain an ownership in Rolling Hills they do not retain a benefit.
- Restrictive covenants are not enforceable by a municipality and do not bind a decision-making authority when considering a planning decision. Restrictive covenants do not hinder a Council's decision-making discretion. If they did, this could lead to potential abuse and a lack of natural justice in the public planning process.
- Some of the restrictive covenants permit 2 horses to be kept on the lots. Some of the restrictive covenants prohibit street lights to be installed. Some restrictive covenants appear to not have been carried forward in the deeds of subsequent purchasers.
- Some of the restrictive covenants refer to "not further subdividing the lots", however, the wording does not speak to an apartment or townhouse condominium being developed that would not require the lots to be further subdivided.

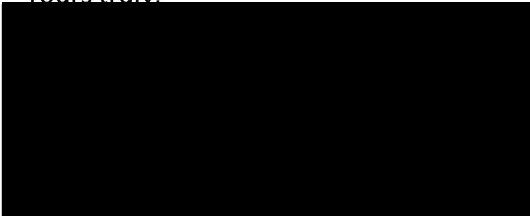
The OMB decision (now OLT) related to 331 Clair Road East dated August 19, 2015 states that:

"the owners of two of the neighbouring properties adjacent to the subject property, within Rolling Hills (including Ms. Riley), expressed interest early in the application process in severing their properties at 287 Clair Road East and 1 Kilkenny Place in order to add lands to the Appellant's proposed development." (page 21)

"The City of Guelph provided the Board with several past decisions in which the Board declined to consider restrictive covenants. In Gammon v. Kingston (City), 2005 Carswell Ont 5101, at para. 6, the Board found it did not have jurisdiction to interpret restrictive covenants and that the tests set out in the Planning Act were most relevant to the decision before it. With respect to an agreement containing restrictive covenants in Nash v. Guelph (City) Committee of Adjustment, 2006 Carswell Ont 4819, the Board found, at para. 31, that "it does not have jurisdiction to make a finding on the status and enforceability of this agreement but rather it is for a civil court of competent jurisdiction." The Board has reached a similar conclusion in relation to the restrictive covenants that have been raised as an issue in this case. The Board finds that the existence of a restrictive covenant is not an appropriate planning consideration in deciding the appeals before it. As noted earlier in this decision, the Board's task is to determine whether or not the proposed development complies with the applicable local and provincial planning policies and instruments." (page 27)

In conclusion, restrictive covenants are not an appropriate planning consideration when deciding on the Shaping Guelph Official Plan update.

Yours truly,

A large black rectangular redaction box covering the signature and name of the official.

cc: Krista Walkey, Chief Planner for the City of Guelph