

February 26, 2020

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

Dear Mayor Guthrie and Members of Council:

**RE: Clair-Maltby Secondary Plan – Open Space System Strategy Report IDE-2020-17
OUR FILE# 17285B**

MHBC has been retained by Options for Homes to assist with the review and assessment of lands located at 2162 Gordon Street in the City of Guelph, which are located within the Clair-Maltby Secondary Plan (CMSP) area. The property (hereinafter referred to as the “Subject Lands”) is located in the southern quadrant of the CMSP Area and is approximately 35 Acres (14 ha) in size. The Subject Lands are part of a larger parcel currently owned by the Foundation for the Support of International Medical Training (FSIMT). Options for Homes have an agreement, dating back to December of 2014 with the FSIMT, to purchase the Subject Lands specifically for the development of a significant affordable home ownership project.

Options for Homes is Canada’s largest non-profit developer working exclusively on making home ownership more affordable for Canadians. Operating for over 25 years, without government funding, Options for Homes is a mission-driven social enterprise that turns home ownership into reality.

We have reviewed REPORT IDE-2020-17 and understand that City staff has recommended a 10 hectare Community Park be located primarily on the Subject Lands within the CMSP.

We believe that the Open Space System Strategy as currently proposed should be deferred for the following reasons:

1. It is premature given the uncertainty surrounding the implementing regulations for Bill 108 and its implications on the City of Guelph’s ability to acquire parklands in the Secondary Plan.

2. Future proposed uses on the existing lands is important to planning as it relates to the City's ability to achieve all goals and objectives of the Official Plan, as well as Provincial policies.
3. The current process is not fair or equitable. In the absence of a cost sharing agreement or requirement for cost-sharing in the CMSP, the value of the Subject Lands is impacted without fair compensation.
4. The 10 hectare minimum size and location proposed for the Community Park is not adequately justified through the analysis provided.

Background

Options for Homes have been actively involved in the CMSP process since its commencement to ensure their interests in developing the lands for affordable home ownership can be achieved. Having been engaged from the beginning of the process, Options for Homes have invested a significant amount of time and resources participating in the development of the CMSP, including as a member of the Community Working Group.

In May of 2019, an Updated Preferred Structure Plan for the CMSP was presented to Council. Options for Homes provided letters to the City in May of 2019 expressing concerns about the process and rationale for the relocation of the Community Park to the Subject Lands. The Community Park had been provided for in an alternative location in past presentations relating to the CMSP and the Draft Structure Plans prior to May of 2019.

Representatives from Options for Homes and MHBC provided delegations to Council at the May 2019 meeting expressing their concerns with the relocation of the park and its impact on the ability of Options for Homes to provide the proposed affordable housing project. We were appreciative of Council's direction to staff to further review the location and size of the Community Park as part of the Open Space System Strategy to be developed to support the CMSP.

We had an opportunity to meet with planning staff in June 2019 to discuss our concerns and understand the approach to the consultation for the Open Space System Strategy. MHBC and Options for Homes were in attendance at both of the Open Space System public workshops on September 25th and November 19th where staff presented a number of options for the location of the Community Park. MHBC, on behalf of Options for Homes, also submitted a feedback letter dated October 11, 2019, in response to the September 25, 2019 Open Space System public workshop and further comments in a letter dated December 4, 2019, following the November 19, 2019 workshop. It should be noted that it does not appear that any of our past submissions were acknowledged or considered in the workshop summaries. Copies of these submissions are attached hereto.

Bill 108 and the Community Benefit Charge for Parkland

Bill 108, An Act to amend various statutes with respect to housing, other development and various other matters, officially received royal assent in the provincial legislature on June 6th, 2019. Known colloquially as the “More Homes, More Choices Act”, the Bill modified an extensive list of laws in various acts with the stated goal of increasing housing supply and affordability. Among these changes, the Province introduced a new “Community Benefits Charge (CBC)” under the Planning Act, to replace various other tools such as parkland dedication currently available to municipalities to create public parks in new development. Implementing regulations for these new legislative tools available to municipalities have not been available at the time of this letter. We understand that these regulations are due to be released imminently.

The lack of implementing regulations regarding the CBC leaves a large amount of uncertainty on how the City of Guelph may or may not be able to acquire the parkland proposed in the Clair-Maltby Secondary Plan. For this reason, we believe a report recommending specific parkland areas within the Secondary Plan area is premature. A deferral would allow City Staff to evaluate the municipality’s ability to acquire parks and the associated costs with the acquisition of parks as well as better inform the parks and open spaces (sizes) in the CMSP.

Achievement of affordable housing in Guelph

The Open Space System Strategy currently in front of Council states that existing land ownership was not considered when placing the Community Park within the Secondary Plan area. Instead, consideration was given to other factors such as suitable terrain, size of population within walking distance, and transportation connections.

The Official Plan and proposed Secondary Plan also contains other goals and requirements that must be met. Section 3.13 of the Guelph Official Plan outlines:

“In order to maintain and enhance a healthy and complete community, the City will make provisions for an adequate range of housing types and affordability options by:

- i) establishing and implementing minimum housing targets for the provision of housing that is affordable to low and moderate income households, in consultation with the County of Wellington; and*
- ii) permitting and facilitating all forms of housing required to meet social, health and well-being requirements, including special needs requirements of current and future residents.”*

Land ownership in a Secondary Plan can impact the ability of City to achieve objectives of the Official Plan. Certain organizations or landowners may have the ability to achieve goals and objectives in an Official Plan such as providing employment, in the case of a major employer looking to locate in the City on a particular site; or, affordable housing, in the case of a non-profit affordable housing developer who are acquiring a particular site. In either case, unnecessarily

encumbering landholdings, that can meet affordable housing objectives, with parks or open space that could be in an alternative location while still meeting park location requirements, impedes the ability for the City to meet its objectives. Strategies for affordable housing, including the costs to deliver, should not happen in isolation from the remainder of the Secondary Plan process.

Lack of Equity in the CMSP Landownership

In most Secondary Plans there is a requirement of the landowners to be part of a cost-sharing agreement to ensure equity in how parks, schools and other community facilities are distributed across the Secondary Plan area. This ensures fair cost sharing in relation to servicing and also ensures that no one landowner is overly designated with parks, schools or facilities and if they are, they are appropriately compensated for those facilities that benefit all of the landowners.

Without a cost-sharing policy or structure in place in the Secondary Plan, and the park and school locations determined, Options for Homes' interest in the land is prejudiced.

Process and Evaluation of the Community Park (Size and Location)

The Open Space System Strategy proposes that Community Parks be a minimum of 10 hectares in size in order to support a wide range of potential activities and uses within the park. Much of the analysis, however, conflicts with the findings presented.

The report states that most municipalities do not require as large an area in their official plans for a Community Park. The report also states that the average size in the City of Guelph for existing Community Parks is below the minimum set out for new parks, and that most community parks of a smaller size still provide the same range and variety of uses and activities. No details are given in the report on what the programming needs are for the community park to justify the minimum 10 hectare size, and it is stated that there was only a slight preference for a single 10 hectare park over two 5 hectare parks in community engagement sessions.

Finally, there is no consideration of the impact of the proposed park when balancing competing public objectives and insufficient justification to support the need for the provision of a park of this magnitude within this area.

Conclusion

In our view, the Open Space System Strategy as currently proposed which includes a Community Park of 10 ha on the Options for Homes Subject Lands should be deferred for the following reasons:

1. Fundamentally, Options for Homes believe any decision made by Council at this time in relation to public parks and open space planning is premature, given the uncertainty surrounding the

implementing regulations for Bill 108 and its implications on the City of Guelph's ability to acquire parklands in the Secondary Plan.

2. Future proposed uses on the existing lands is important to planning as it relates to the City's ability to achieve all goals and objectives of the Official Plan as well as Provincial policy as we have previously outlined. Our client's unique ability to construct affordable housing at no cost to the City is compromised with the Community Park being located on the subject lands as currently proposed. This in turn impedes the City's ability to advance its housing objectives through a willing and able developer of affordable housing.
3. The current process is not fair or equitable. In the absence of a cost sharing agreement or requirement for cost-sharing in the CMSP, the value of the Subject Lands is impacted without fair compensation.
4. The 10 hectare minimum size and location proposed for the Community Park is not justified through the analysis provided.

We request that Council defer the approval of the Open Space System Strategy until a later time once the above matters have been clarified.

If you have any further questions on these matters, please do not hesitate to contact us.

Sincerely,



MHBC

Dana Anderson,
Partner
MHBC Planning Limited

Cc: Heather Tremain, Options for Homes
Daniel Ger, Options for Homes
Jeff Evenson, Options for Homes
Cynthia MacDougall, McCarthy Tetrault

October 11, 2019

Stacey Laughlin
City of Guelph
1 Carden Street
Guelph, ON

Dear Ms. Laughlin:

RE: Clair-Maltby Secondary Plan Open Space System Workshop (September 2019)
OUR FILE 17285B

MHBC has been retained by Options for Homes to assist with the review and assessment of the lands located at 2162 Gordon Street in the City of Guelph which are located within the Clair-Maltby Secondary Plan (CMSP) Area. The property (hereinafter the “Subject Lands”) is located in the southern quadrant of the CMSP Area, and is 35 Acres (14 ha) in size. A location map is attached as Figure 1.

Options for Homes is Canada’s largest developer working exclusively on making home ownership more affordable for Canadians. Operating for over 25 years, without government funding, Options for Homes is a mission-driven social enterprise that turns home ownership dreams into reality.

We understand that since December, 2014, Options for Homes has had an agreement with the Foundation for the Support of International Medical Training (FSIMT), one of the landowners within the CMSP Area. This agreement is to purchase 35 acres (14 hectares) of land for the development of a significant affordable home ownership project. Options for Homes has been actively involved in the CMSP process since its inception to ensure its interests in developing the lands for affordable home ownership can be achieved. Options for Homes have invested a significant amount of time and resources to participate in the CMSP process since the beginning, including being a member of the Community Working Group for the CMSP. We further understand that upon presentation of the Updated Preferred Structure to Council in May of 2019, City staff was directed to review the location of the Community Park, which at that time was recommended to be relocated to the Subject Lands. Both Options for Homes and MHBC, on behalf of Options for Homes, provided letters to the City in May of 2019 expressing concerns about the process and rationale for the relocation of the Community Park to the Subject Lands. Representatives from Options for Homes and MHBC were in attendance at the Open Space System public workshop on September 25th,

2019, where staff presented a number of new options for the location of the Community Park. The Subject Lands continue to be considered as one of the potential locations for the Community Park. We understand that an additional Open Space System workshop will be held later this year with recommendations to Council to follow in early 2020.

Please consider this letter as the response and feedback from Options for Homes regarding the potential location of the Community Park within the CMSP. We welcome additional discussion with City staff regarding these matters and look forward to participating in the next phases of the CMSP process.

Affordable Housing

Although the concept of the Open Space System workshop was to begin with first principles in park location planning, we believe that it is important to also consider proposed land uses at this stage, both from the perspectives of what may be displaced by the Community Park as well as ensuring that the Community Park location will best serve the evolving community.

As discussed previously in the letter, Options for Homes has an agreement to purchase 14 hectares of land at 2162 Gordon Street for the development of a significant affordable home ownership project. The community and public benefit provided by the proposed development is significant as affordable housing, particularly affordable ownership options, is a growing need within Ontario and specifically within Guelph. Moreover, the development will respond to this demand without relying on government subsidy.

According to CMHC, Guelph has one of the lowest vacancy rates and is within the top 10 most expensive municipalities in all of Ontario in which to rent. The City of Guelph Official Plan identifies that 30% of all new residential developments be affordable, with 25% of that to be affordable homeownership. A development containing 100% affordable home ownership, exclusively for end-users, would play a major role in achieving these outcomes.

In order to achieve an optimal supply of affordable housing with a variety of housing types that meet a diversity of needs based on household income and family composition, there is a need to efficiently develop land. In this regard, Options for Homes planned to develop a variety of affordable home ownership units on 35 acres (14 ha) of land, which implements Provincial and local policies respecting affordable housing. The location of the Community Park on the Subject Lands effectively reduces the developable area from 35 acres (14 hectares) to 11 acres (4.5 hectares). This would result in a significant reduction in the number and type of affordable homeownership units in the CMSP, and within the City of Guelph as a whole.

In our opinion, the underlying proposed land use and proposed development should be considered as a key variable in the location of the Community Park. Affordable housing is a community benefit that is an identified need, and this instance, can be provided at no additional cost to the City. The City's policy goals to promote affordable housing should be factored into the equation of the location of the Community Park. If the Community Park is to be located on the Subject Lands, that decision will have a significant impact on the number and type of affordable units that will be able to be developed.

The Need for a Single 10 Hectare Community Park

Community Parks are significant public assets and represent a substantial investment from the City. Therefore, detailed analysis is warranted to determine the correct location and provision levels to properly serve the community. We understand the policy goals of the City of Guelph Official Plan are to provide 3.3 hectares of parkland per 1,000 residents, including Community Parks at a rate of 1.3 hectares per 1,000 population. We also understand that the Subject Lands are within a 2 kilometre driving distance from the existing South End Community Park.

It is our view that these considerations warrant additional analysis, and to-date, we have not yet seen the analysis supporting the need for a single 10 hectare park as opposed to other Open Space System options, nor a methodology that was used to determine an appropriate location. Parks are critical components of complete communities, and we are in support of the provision of open spaces within the CMSP Area, however we believe a number of questions should be considered during the analysis of first principles. These include:

- What is the appropriate and desired function for the Open Space System components in the CMSP Area?
- What size of Open Space System is appropriate to serve the desired functions?
- How far should Community Parks be located from existing Community Parks?
- Is a single Community Park adequate to serve the CMSP Area community?

It is our opinion that the existing location of the South End Community Park should be considered when siting a Community Park (or multiple smaller parks) within the CMSP Area. Provided that Community Parks are significant and enduring City assets, they should be located to serve the community in the most effective manner. Clustering of park assets may not maximize their service potential.

Equitable Access

A key variable in the location of parks should be equitable access. In this regard, it is important to understand where the highest densities of residents will be located, where proposed active and public transportation corridors will be located, proximity of parks to an arterial road, and the location of other existing and proposed parks. A healthy Open Space System is one that is easily accessible for as many residents as possible. As such, considering two or more 'larger' parks as opposed to a single 10 hectare Community Park may be a more prudent use of public assets in order to provide the most accessible system.

It is our opinion that two or more parks should be considered as opposed to a single Community Park. The same argument against the clustering of resources provides the rationale for this recommendation. Multiple parks would provide additional opportunity to serve separate functions and provide greater community access to the Open Space System.

Moraine Ribbon and Natural Heritage Systems

We understand that in addition to the Community Park(s), the City is also considering the acquisition of a 12-metre wide ribbon (Moraine Ribbon) along all sides of the Natural Heritage System (NHS) within the CMSP Area. The Moraine Ribbon will serve both passive and active recreation functions, and will also provide an ecological enhancement area outside of the existing NHS buffer.

For all intents and purposes, the Moraine Ribbon is a linear park, providing similar functions that would be sought within a traditional City park. The Subject Lands are already constrained by the presence of NHS lands and a significant stretch of the Moraine Ribbon is proposed within and adjacent to the Subject Lands. Should the Community Park(s) be located on the Subject Lands, and accounting for the Moraine Ribbon, there will be even less land available for the development of affordable housing on the Subject Lands.

In our opinion the City should consider the presence of the Moraine Ribbon as an active park-like Open Space feature. Multiple parks connected to the Moraine Ribbon may represent a very unique and connected recreation experience. In contrast, and in terms of equitable access, should the City desire a single 10 hectare Community Park, we believe it should be located on lands that do not have direct access to the Moraine Ribbon, Neighbourhood Parks or NHS features.

Responses to Workshop Questions

In consideration of our comments highlighted throughout this letter, the following is our response to Questions 1 to 3 from the Open Space System public workshop:

- 1. Our top three sites for a single Community Park are the 'tree', the 'pushpin' and the 'lightning bolt'. The 'tree' and 'lightning bolt' are located at the Gateway to the CM community, they are located within proximity of Gordon Street, and neither have access to the Moraine Ribbon or NHS features. The 'pushpin' is the furthest location from the existing South End Community Park, provides better park coverage for the whole CM community, and has significant frontage along a proposed road.***
- 2. Our top two pairs of locations for two medium sized parks are the 'pushpin' with the 'lightning bolt', and the 'pushpin' with the 'tree'. The rationale for this is the same as stated in question 1, as well as these options provide very good park coverage across the CM community and equitable access to the open space resources.***
- 3. We prefer 2 medium sized parks. This option will offer two parks of significant size that can provide diverse functions while more widely and equitable serving the CM community. It also affords a more flexible approach to the acquisition of properties, allowing the City to work with land owners toward an agreed and mutually beneficial solution that does not constrain entire parcels of land. Two parks also provide additional opportunities for a larger open space system to connect with substantial parkland features.***

Conclusion

We appreciate that the City is taking steps to re-evaluating the location of the Community Park and providing stakeholders with adequate opportunity to provide feedback. By including the Subject Lands as a proposed location for a Community Park, we believe that the City has not adequately accounted for the benefits of affordable homeownership that Options for Homes is proposing.

Additionally, it is our opinion that analysis should be presented by the City that confirms the necessity for a single 10 hectare Community Park within the CMSP Area. We recommend that two or more parks be considered in order to adequately serve the community through a more accessible and multi-functional Open Space System. And we believe that the clustering of green space provided the proximity to the South End Community Park, NHS features and the Moraine Ribbon does not equitably serve community residents.

We respectfully request that this letter be accepted as feedback pertaining to the September 25th, 2019 Open Space System public workshop, and be considered by the City in the next phase of the Open Space System planning process.

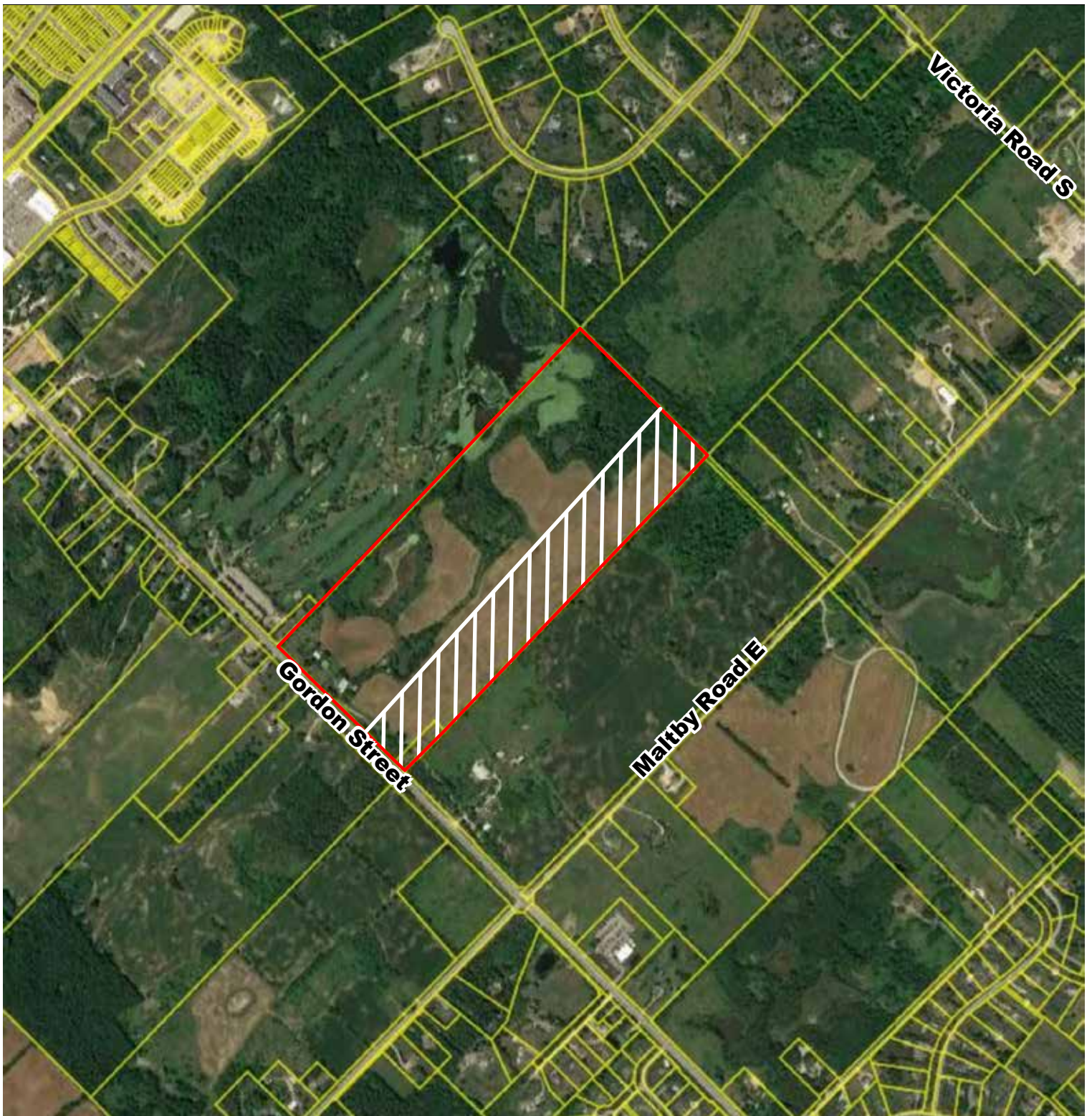
Sincerely,

MHBC



Adam Harrison,
Policy and Development Planner
MHBC Planning Limited



Cc: Dana Anderson, MHBC Planning
Heather Tremain, Options for Homes
Daniel Ger, Options for Homes
Liana Carnevale, Options for Homes



Data Source: First Base Solutions Aerial Flown 2015

Figure 1
Location Map

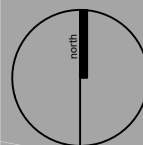
LEGEND

-  Subject Lands
-  Approximate portion of the subject lands to be developed by Options for Homes

2162 Gordon Street,
Guelph, Ontario

DATE: October 9, 2019

SCALE: N.T.S



N:\17285\8 - Clair-Maltby Secondary Plan\2019\October\Figure 1

MHBC PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE
442 BRANT STREET BURLINGTON, ON, L7R 2G4
P: 905 639 8686 F: 905 761 5589 | WWW.MHBCPLAN.COM

December 4, 2019

Stacey Laughlin
City of Guelph
1 Carden Street
Guelph, ON

Dear Ms. Laughlin:

RE: Clair-Maltby Secondary Plan Open Space System Workshop (November 2019)
OUR FILE 17285B

MHBC has been retained by Options for Homes to assist with the review and assessment of the lands located at 2162 Gordon Street in the City of Guelph which are located within the Clair-Maltby Secondary Plan (CMSP) Area. The property (hereinafter the "Subject Lands") is located in the southern quadrant of the CMSP Area, and is 35 Acres (14 ha) in size. A location map is attached as Figure 1.

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We understand that Options for Homes has an agreement dating back to December of 2014 with the Foundation for the Support of International Medical Training (FSIMT), one of the landowners within the CMSP Area. This agreement is to purchase the Subject Lands, specifically for the development of a significant affordable home ownership project.

Options for Homes has been actively involved in the CMSP process since its inception to ensure its interests in developing the lands for affordable home ownership can be achieved. Options for Homes have invested a significant amount of time and resources to participate in the development of the CMSP since the process began in 2016, including as a member of the Community Working Group for the CMSP.

We further understand that upon presentation of the Updated Preferred Structure to Council in May of 2019, City staff was directed to review the location of the Community Park, which at that time was recommended to be relocated to the Subject Lands. Both Options for Homes and MHBC, on behalf of Options for Homes, provided letters to the City in May of 2019 expressing concerns about the process and

rationale for the relocation of the Community Park to the Subject Lands. Representatives from Options for Homes and MHBC were in attendance at the Open Space System public workshops on September 25th and November 19th, 2019, where staff presented a number of new options for the location of the Community Park. MHBC, on behalf of Options for Homes, also submitted a feedback letter to the City in response to the September 25th, 2019 Open Space System public workshop.

Please consider this letter as the formal response and feedback from Options for Homes regarding the potential location of the Community Park within the CMSP presented at the second Open Space System public workshop. We expect that the feedback presented herein becomes part of the formal “summary of feedback” for the November 29, 2019 public workshop. We also welcome additional discussion with City staff regarding these matters and look forward to participating in the next phases of the CMSP process.

Park Siting Process

We have significant and ongoing concerns regarding the process employed by the City to site the Community Park, as well as the lack of analysis presented regarding the parks and recreational needs of the new community within the CMSP area.

Over two years of research, analysis and engagement was undertaken to determine the Preferred Community Structure for the CMSP area, as released in June of 2018. At that time, the Community Park was conceptually located at the south edge of the CMSP area along Maltby Road East and just east of Gordon Street. Staff indicated that this location was selected due to access from major roads and favourable topography.

In May of 2019 staff provided an Updated Preferred Community Structure to Council, at which time the Community Park had been relocated to the Subject Lands along with a school site. Between the release of the Preferred Community Structure in June of 2018 and the Updated Preferred Community Structure in May of 2019, and to the best of our knowledge, no additional formal consultation with the public was conducted regarding the relocation of the Community Park. In the staff report that accompanied the Updated Preferred Community Structure in May of 2019, staff noted that the Community Park relocation to the Subject Lands was due to the desire to co-locate larger surface water management areas with the school and the Community Park, and that the move also addressed some community comments that the park should be closer to Halls Pond. At that time, Council directed staff to reconsider the proposed location of the park in light of community concerns regarding the loss of opportunity to develop affordable housing on the Subject Lands should the park be located there instead.

We remain concerned by the lack of technical analysis provided by the City that justifies the siting of a significant and expensive public asset within the CMSP area. There are a number of questions that have been posed to the City by Options for Homes, by MHBC and by other attendees at the Open Space System public workshops that remain unanswered regarding the process and rationale for the siting of the Community Park. These include:

- What data and demographic analysis has been used to determine the correct size of the parkland system required in the CMSP area?
- What additional information is being considered in the siting of the park, beyond areas of land that can accommodate a single 10 hectare park?
- How much weight is being given to the public consultation held at the two Open Space System public workshops in comparison to technical, fiscal and other considerations?
- How does the City intend to balance the other public interests in the CMSP area with the location of the Community Park? This is particularly relevant for affordable home ownership development and the constraints imposed on a single landowner by siting a 10 hectare park on their lands which are otherwise intended for affordable homeownership, which is the case for Option for Homes.
- What strategy will the City employ to acquire the 10 or more hectare land area for the park?
- How can an investment of this scale be justified in absence of an understanding of the desired park and recreation programming, and thus a thorough understanding of the land requirement?
- How can the development of a new Community Park be justified when there is already a large Community Park in the neighbourhood, 6 new Neighbourhood Parks are proposed, a 20-24 hectare Moraine Ribbon is proposed, and when the CMSP is rich with natural open space?

We would also like to express our concern about the lack of rationale provided at the November 19th public workshop to justify the six final options presented. It is unclear how the feedback from the first public workshop and/or other analysis informed the determination of the six final options, in particular the question posed at the first Open Space System public workshop, “*Is there a site you would rule out?*”, does not appear to have been considered. It also remains unclear why the Subject Lands (the ‘plus sign’) were included in three of the six options for the location of the Community Park. By focusing on the Subject Lands in 50% of the available scenarios, there is an implication that those lands are a more suitable location than all other options. The lack of analysis presented by the City at the November workshop to justify their options has raised more questions than it has provided answers.

We remain concerned that no technical analysis was provided to stakeholders at the Open Space System public workshops to inform public opinions and that no additional information has been shared related to the larger decision making process to properly site the Community Park. We are also concerned that by presenting the Subject Lands as the location of the Community Park in three of the six options, the City has presented a bias toward the Subject Lands without proper justification. It remains unclear how a final decision on the location of the Community Park will be reached by the City and what additional analysis will be provided to stakeholders.

Affordable Housing

A guiding policy objective for the current Provincial government is the development and provision of housing, and in particular affordable housing. We agree that parks and open space are important aspects of community development, however they are not more important than the adequate provision of affordable housing.

As discussed previously in the letter, Options for Homes has an agreement to purchase 14 hectares of land at 2162 Gordon Street for the development of a significant affordable home ownership project. The community and public benefit provided by the proposed development is significant as affordable housing, particularly affordable ownership options, is a growing need within Ontario and specifically within Guelph. Moreover, the development will respond to this demand without relying on government subsidy.

According to CMHC, Guelph has one of the lowest vacancy rates and is within the top 10 most expensive municipalities in all of Ontario in which to rent. The City of Guelph Official Plan identifies that 30% of all new residential developments be affordable, with 25% of that to be affordable homeownership. A development containing 100% affordable home ownership, exclusively for end-users, would play a major role in achieving these outcomes. However, the City has not yet provided policies or studies that indicate how affordable housing will be provided and promoted within the CMSP area.

In order to achieve an optimal supply of affordable housing with a variety of housing types that meet a diversity of needs based on household income and family composition, there is a need to efficiently develop land. In this regard, Options for Homes planned to develop a variety of affordable home ownership units on 35 acres (14 ha) of land, which implements Provincial and local policies respecting affordable housing. The location of the Community Park on the Subject Lands significantly reduces the development potential of the lands for affordable housing, and at worst, renders the project untenable. This would result in a significant reduction in the number and type of affordable homeownership units in the CMSP, and within the City of Guelph as a whole.

In our opinion, the underlying proposed land use and development interest should be considered as a key variable in the location of the Community Park. Affordable housing is a community benefit that is an identified need, is a key Provincial policy directive, and in the case of the Subject Lands, can be provided at no additional cost to the City. The City's policy goals to promote affordable housing should be factored into the equation of the location of the Community Park. If the Community Park is to be located on the Subject Lands, that decision will have a significant impact on the number and type of affordable units that will be able to be developed.

Location of the Community Park

In siting a Community Park a number of factors warrant consideration, in addition to public opinion and co-location of open spaces. These factors may include:

- Proximity to existing parkland assets;
- Proximity to other planned parkland assets;
- Proximity to non-parkland open space areas;
- Proximity to high-density development;
- Trade-off between what is proposed to be developed on the land instead of the park;
- Parkland programming and use;
- Environmental analysis (e.g. clearing land and natural topography);
- Access to the park from roadway network;
- Access to the park from public and active transportation routes;
- Acquisition costs;
- Acquisition complexity (e.g. multiple land owners, multiple lots); and
- Policy analysis in relation to Official Plan.

In absence of a thorough technical analysis it is difficult, as a stakeholder or member of the public, to determine where the Community Park should be located. However based on the interests of Options for Homes to develop affordable housing on the Subject Lands, and combined with established Provincial policy interests to develop affordable housing, City of Guelph Official Plan policies promoting affordable housing development, the natural topography and potential environmental concerns near Halls Pond, and the proximity of the existing South End Community Park, it is our opinion that the Subject Lands are not a suitable location for the Community Park in comparison to potential alternatives.

More suitable locations should have increased access from arterial roads, be located further from the existing South End Community Park, and have more favourable topography and less complex environmental concerns than those present on the Subject Lands.

Conclusion

We appreciate that the City is taking steps to re-evaluate the location of the Community Park and providing stakeholders with an opportunity to provide feedback. By including the Subject Lands as a proposed location for a Community Park, we believe that the City has not adequately accounted for the benefits of affordable homeownership that Options for Homes is proposing nor have stakeholders been properly informed of the underlying reasons for the re-evaluation of the park location.

Additionally, it is our opinion that additional analysis should be presented by the City that confirms the necessity for a single 10 hectare Community Park within the CMSP area and rationale for why the options presented at the second Open Space System public workshop were selected. We also request that additional technical analysis be provided that identifies the various factors that will be considered in the final decision for the location of the Community Park.

We have identified a number of policy and technical factors that we believe should be considered in the decision making process and that should disqualify the Subject Lands as a favourable alternative for the location of the Community Park.

We respectfully request that this letter be accepted as feedback pertaining to the November 19th, 2019 Open Space System public workshop, and be considered by the City in the next phase of the Open Space System planning process.

Sincerely,

MHBC



Adam Harrison,
Policy and Development Planner
MHBC Planning Limited

Cc: Dana Anderson, MHBC Planning Limited
Heather Tremain, Options for Homes
Daniel Ger, Options for Homes
Craig Cal, Options for Homes
Liana Carnevale, Options for Homes