

**Submission to Guelph City Council - 13 July 2020
from the Old University Residents Association (OUNRA)**

The Old University Neighbourhood Residents' Association (OUNRA) is the oldest Residents Association in the City and over the years we have tried to both give voice to the concerns of our neighbourhood as well as work for positive solutions to make our neighbourhood, as well as the whole city, the best the community can be. We have worked hard to build constructive relationships with the City, the University of Guelph as well as Police, Bylaw and other City services. We welcome this opportunity to add our voice to the discussions concerning the Bylaw Review and other changes related to Additional Residential Units in Guelph.

We wish to offer the following comments.

1. We understand that the changes outlined in the discussion paper arise directly from changes to Ontario's Planning Act. Beyond that, we also understand and appreciate that the intent of the changes is to permit greater population density and the provision of increased amounts of affordable housing for the City. In short, we support the social and planning motivation behind the changes.
2. Changing the terms used for the different forms of dwellings and coordinating them with what the Planning Act uses, makes a great deal of sense. The discussion paper makes things clearer and easier to understand.
3. OUNRA does not see a problem with eliminating the 80 sq. metre rule nor with changing the dwelling proportional limit from 45% of exterior measured area to 50% of internal measured area net of stairways, mechanical rooms and such. This will likely make little difference to what is built and it will reduce appeals to the Committee of Adjustment, which are normally granted.
4. OUNRA understands the intent to increase the number of bedrooms in the additional units from 2 bedrooms to 3. This would make such units more useful for renters needing more affordable housing. Such a development is to be welcomed in Guelph where the housing supply is short and in high demand. However, for us in the Old University Neighbourhood (OUN), there is a potential downside, a concern which is shared with other communities in Guelph, such as the McElderry Community to the south of Stone Road. Our concern is that the increase in bedrooms will make it more likely for landlords to buy up more property and increase the number of students housed in these properties. We will return to this issue below.
5. The Planning Act requires that municipal governments allow the construction of additional dwelling units as separate buildings that are subordinate to the primary

dwelling on the property. This, too, makes sense as means of increasing density and for creating more affordable housing.

But the discussion paper also recommends that the separate dwelling be limited to two storeys in order to make it subordinate to the primary dwelling in Guelph residential zones where 3 storeys are almost all universally permitted. This form of control, however, is illusory because 3-story houses are relatively rare in Guelph. Even in zones allowing 3 storeys, many (often most) are single storey. It would be hard to argue that a two-storey additional dwelling is subordinate to a single-storey primary dwelling. A more effective way would be to insist that the subordinate building would be limited to one story or one story less than the primary building, whichever is the greater. This would effectively limit the separate additional dwelling in almost all of Guelph to a single storey.

6. We would further note that the increase in the number of separate dwelling units throughout the City will threaten Guelph's hope to reach 40% coverage with urban forest. Increasing housing density will lead directly to fewer trees unless Guelph does something to protect trees in plots of land less than 0.5 hectares. At the moment, Guelph has no secure method of protecting the large majority of its urban trees.
7. We now come to the crux of the problem for OUNRA in our context: increasing the amount and concentration of housing that is used to provide accommodation for a single class of renter. In the case of the OUN, this turns out to be students. OUNRA has a long history of living with large numbers of students in our neighborhood. Thanks to concerted efforts by resident homeowners, City staff, Guelph Police Services and the University of Guelph, life with student neighbours has become much better balanced in terms of group behaviour/activity and property maintenance. Ten to 15 years ago, general meetings of the neighbourhood were rife with anger and upset about student behaviour. This is no longer the case. When there are flareups, interventions by the City and the University usually return things to a calmer state.

Clearly, our concern is no longer so strongly focused on renter behaviour. The issue now is that when the concentration a single type of renter rises past a key tipping point that particular area becomes less attractive for many other residents. Eventually, families move away and landlords buy up the remaining properties. Because the OUN is close to the university campus these renters are almost always students. For a time, we worried that many parts of the OUN might slide into student-only housing. Over the last several years this trend has stopped mainly due to a significant rise in property values in the OUN. At prevailing rental rates, it has been hard for landlords to see a profit from the investment in new properties.

We feel, however, that adding as many as six new rental bedrooms per property could, once again, make rental property investments in the OUN profitable. Without mitigation strategies, the OUN could return to a period where the social fabric of the

neighbourhood was seen to be threatened. We might see further areas within the OUN come to be dominated by student housing and with even more families choosing to move from the OUN.

Over the years, we have come to understand that the City's control levers in the shared rental housing context are limited. In the face of such limited options, OUNRA encourages the city to consider some measure of oversight as to how landlords can develop rental properties into income streams. We suggest the city again explore the possibility that all rental units have to be licensed or registered to operate as rental services/agents along with some boundaries regarding property maintenance, etc. be put in place. We know other cities in the province do license such businesses. City staff can perhaps draw on the experience and wisdom of other municipalities.

The City of Guelph has laid out a number of sweeping visions for the city – in its Urban Design Vision of 2017 as well as its Urban Design Action Plan. These include: “Ensure infill is sensitive to its context and *enhances the quality of the neighbourhood*” (italics added) and having 40% canopy coverage for Guelph's urban forest. These remain only aspirations unless bylaws and guidelines are put in place to bring them about. We wish to challenge the City Council to live up to these high aspirations by ensuring that they shape this bylaw process. Again, we would wish to underline that we are not opposed to urban intensification as mandated by the provincial government. Neither are we opposed to having students throughout the Old University Area. But we do want to ensure that these “Ensure that the design of the built environment respects the character of existing distinctive areas and neighbourhoods of the city” (“Urban Design Vision, 2017) – The Old University Area as well as all other neighbourhoods of our city. We would further wish to affirm our commitment to work with City Council as this Bylaw Review Process continues.

Thank you for your consideration and consulting with citizens of Guelph and other groups such as neighbourhood associations.