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Memorandum

To/Attention	City of Guelph DC Team	Date	March 25, 2013
From	Audrey Jacob	Project No	33974
cc	Bob Stratford	Steno	
Subject	Guelph DC - Growth Forecast Peer Review		

Further to our meeting of March 8, 2013, this memo outlines some areas of concern regarding the growth forecast to be used for DC purposes in the Guelph 2014 DC. My apologies for my tardiness in getting my comments back to you in writing.

Housing Supply

1. Schedule 5A of the DC forecast material provides a summary of future housing unit supply potential as of mid 2006. In the context of this table, the team advised that the City's Development Priority Plan (DPP) 2012 provided some of the input; a hard copy of this document was provided at the meeting. I have since found the soft copy available on the City's website; the previous DPPs are also available online. Setting aside the difference in the base year (2006 versus 2012), I still cannot make the connection between the two summaries of supply. My concern focuses on the fact that at Schedule 5A of the DC background material some 26,323 housing units are identified as potential supply; this compares to 10,317 units identified in Schedule 7 – Table 1 of the DPP. Even allowing for growth built in the 2006 to 2012 timeframe (based on building permit data), my order of magnitude estimates of total housing supply as at 2006 are in the range of about 15,000 +/- ; this is not close to the 26,323 housing units reflected in Schedule 5A. Please clarify.
2. Further on Schedule 5A, under Greenfield Area, at the meeting I inquired about the difference between two categories: 'residential land uses outside approved plans' and 'greenfield general residential designation'. Please explain.
3. Schedule 7 – Table 1 of the DPP has a total of 2,046 'infill townhouse and apartment site' units (one line entry is under total short term and the other is under total medium term). My interpretation is that the short term would likely be in the next 5 years and the medium term would be in the next 10 years +/- . The estimate of infill is based on a review carried out by staff as reflected on Schedule 7 – Map 2 which identifies the zones infill sites; 16 apartment sites and 12 townhouse sites are identified. Of the 28 sites, 8 sites are currently occupied and 9 sites are potential brownfields. Given these characteristics, in my view it would be entirely appropriate to apply some manner of discount to the sites, particularly those that are occupied and/or potential brownfields. This has not been done. In my view, the City has overestimated the infill opportunities. Please review and advise.
4. Schedule 5A also includes anticipated other intensification; the basis of this number is unknown. To some extent the estimate reflects the completion of subdivisions post the imposition of the built boundary line. However, given the approach taken in #3 above and the lack of a discount, it is likely that the City's estimate of intensification has not been

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discounted. If it has not, in my view the City has overestimated the potential supply in this category. Please review.

5. Based on Schedule 7 – Table 1 of the DPP 2012, it appears that the City has a 9.7 year supply of housing. This is less than the minimum 10 year requirement identified under 1.4.1 (a) of the PPS. This further reinforces my concerns around the housing supply. Absent further understanding of the housing supply derived by Watson at Schedule 5 of the DC background material, I continue to have concerns regarding the supply of housing over the next 10 years and to buildout. Responses to the earlier questions will assist in ascertaining if my concerns around the housing supply are warranted.

PPU

6. Schedule 7 of the DC background material (p A-10) focuses on the derivation of appropriate estimates of persons per unit (ppu). I have two concerns with the ppu:
 - a. The Watson approach assumes a 20 year average ppu. Given that the DC material relates to a 10 year timeframe, it would be my expectation that a 10 year average would have been more appropriate. Please review and advise.
 - b. Of particular concern, is the approach to apartments. As noted on Schedule 7, data is available only for 1 or 2 bedroom apartments over the last 10 years; this suggests that other sized apartment units have not been delivered in the last 10 years. In my view, the focus of the ppu analysis for apartments should be focussed on 1 and 2 bedroom units, thus yielding a lower ppu for apartments from the 1.71 estimated to about 1.59 based on my suggested approach. Please consider.

Population

7. If the housing supply is less than anticipated and the ppu is lower, the City may have difficulty in meeting their population growth targets. This is simply an observation and no response is required.

Employment

8. Over the 2001 to 2013 timeframe (a 12 year timeframe) , according to the DC material provided, the City's employment grew by some 9,062 jobs (including work at home and no fixed place of work). The forecast 2013 to 2023 anticipates job growth of 16,330, an 80% growth increase over the 2011-2013 growth. This may be aggressive. This is simply an observation and no response is required.
9. During the 2001 to 2013 timeframe industrial jobs grew by 1,205 jobs. The forecast over the 2013-2023 timeframe assumes industrial job growth of 4,849 – or a four fold increase. Given the historic trend, in my view this is not very likely. Please comment.
10. At Schedule 9B of the DC material, the non-residential GFA forecast is provided (based on the employment forecast). The schedule identifies 5.3 million sf of industrial space over the 10 year time horizon 2013 to 2023. The non-residential construction value of building permits is summarized for the 2002 to 2011 timeframe in Schedule 10 of the DC material provided and notes industrial total of \$281.1 million. Assuming \$80 to \$100/sf for construction costs, this translates into 2.8 million sf to 3.5 million sf being constructed over the 10 year timeframe. This is substantially less than what has been forecast over the next 10 years and reinforces concern that the forecast is relatively high. Please comment.

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11. From a land supply perspective, taking the view to buildout, the 13,788,500 sf of industrial GFA needs to be accommodated on land.
- At 30% coverage, some 1,055 net acres are required.
 - At 40% coverage, the land required drops to 791 acres.
 - However, a portion of commercial/population related and institutional jobs will occur on industrial lands. Assuming a 35% and 10% share of commercial and institutional jobs occurring respectively on industrial lands and assuming 40% coverage, some 147 acres would be required.
 - Adding this to the earlier land area estimate required yields a total in the range of 938 to 1,202 acres of employment lands.
 - At 2009, based on the ELS Ph 2 study, the City had 883 net acres of vacant designated employment land (allowing for 5% vacancy across the City's designated employment land supply, and allowing for recommended conversions).
 - It appears that there is a potential shortfall of employment lands when a lower employment density consistent with recent trends is used. This result suggests continued monitoring of the employment density is required.
 - This also suggests that the 1,100 sf/ empl used for industrial GFA calculations in the DC may also be low.

* * * * *

I make a number of these comments knowing that the City's land supply is constrained by the current urban boundary. If growth is to occur over both the 10 year horizon or to build out, sufficient lands will need to be available to accommodate growth. Knowing that a 5 year review could occur in 2018 +/- and may take 5+ years to implement i.e., 2023. Adding in the need for EAs and servicing review, takes the City very close to a 2031 time horizon. Given that an annexation will be required, additional time would be needed to bring any additional lands into the urban boundary.

MEMORANDUM

To:	Audrey Jacob	Fax	<input type="checkbox"/>
From:	Jamie Cook/City of Guelph DC Team	Courier	<input type="checkbox"/>
Date:	April 23, 2013	Mail	<input type="checkbox"/>
Re:	Response to IBI March 25, 2013 Memo RE Guelph DC Growth Forecast Review	e-mail	<input type="checkbox"/>

Please find our response to your March 25, 2013 memo provided below.

Housing Supply

Question 1.

The concern raised in the first item is that the future housing supply summary as stated in the Development Priorities Plan (DPP) is not aligned with the housing supply summary as reported in the Development Charges (DC) Growth Forecast, dated February 20th, 2013. There are a few reasons why this is the case:

- a. The major reason for the difference in the two housing supplies, is that the DPP only accounts for the supply that has already been established through: registered lots, expected units as part of an application for a plan of subdivision, and units anticipated through an expression of development interest (subdivisions), along with units on zoned townhouse and apartment infill sites. Additional lands exist in the City that are designated for residential development in both the built-up and Greenfield areas and are anticipated for future development, but where there are no current development interests. The potential housing supply generated by these lands is not accounted for in the DPP; however, they are accounted for in the City's long term housing supply that forms part of the DC Growth Forecast.

- b. Housing supply that is generated through development proposals are only included in the City's growth forecast once there has been some level of development commitment (i.e. zoning,

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subdivision draft approval, subdivision registration or in some circumstances, such as the Guelph Innovation District Secondary Plan, Council endorsement of the preferred land use option). The long term housing supply contained within the DPP on Schedule 7 – Table 1 accounts only for dwelling units anticipated within subdivision proposals that have formally been received and are in process, preliminary and unofficial proposals, and expressions of development interest. Due to the highly variable nature of change among subdivision proposals that inform the DPP’s long term housing supply, anticipated unit counts are not integrated into the City’s housing supply contained in the growth forecast. For lands in those instances, density assumptions for the corresponding designations have been used to estimate the potential unit yields.

- c. The criterion for inclusion of a development proposal in the DPP presently has a minimum threshold of 10 units. While the DPP does not account for units contained within applications of less than 10 units, once approved, the City does include them in the housing supply contained in the growth forecast.

Question 2.

Clarification around the difference between the two categories ‘residential land uses outside approved plans’ and ‘greenfield general residential designation’ has been requested.

The “Greenfield ‘General Residential’ Designation”, now known as “Low Density Greenfield Residential” is actually a subset of the ‘Residential Land Uses Outside Approved Plans’. In the City’s data, the “Low Density Greenfield Residential” unit splits are visually separated and broken out by unit types for enhanced transparency, due to the broad range of housing types and densities that are permitted within the designation. A formula was developed and applied to the Low Density Greenfield Residential designation to estimate the housing types and densities that the City could anticipate in the long term average to 2031.

For the purposes of the Development Charges Growth Forecast, the two should be summarized under the more global heading of “Residential Land Uses Outside Approved Plans”. Schedule 5A will be revised to include an update of the line item as it appears in Table 1 below:

Table 1.
Amendment to Schedule A of the Development Charges Growth Forecast.

Stage of Development – Greenfield Area	Singles & Semi-Detached	Multiples	Apartments	Total
Residential Land Uses Outside Approved Plans	1,369	3,816	2,204	7,389
% Breakdown	19%	52%	29%	100%

Question 3.

The concern raised is that the City has overstated the amount of infill potential to 2031 as noted in the DPP on Schedule 7 – Table 1, and reflected spatially on Schedule 7 - Map 2. Further clarification was sought by City staff on this item and it was confirmed that the main concern is around the assumption that 100% of the zoned infill sites will be developed by 2031 and that no discount factor has been applied. There was also some uncertainty discussed in the reviewer's memo to the City around the timing of development of units reported in the short, medium and long term housing supply within the DPP.

Schedule 7 – Table 1 of the DPP contains a summary of projected housing supply, and was originally included to demonstrate that the City was meeting PPS policy which requires a minimum 3 year housing supply contained within draft approved and registered plans of subdivision. More recently, the schedule has been expanded to include zoned infill potential in the housing supply to provide for a more accurate account of the available number of potential units. The supply listed on Schedule 7 does not specifically refer to timing of development, but rather it is a method used to categorize available housing supply by stage of development approval, and in the case of zoned infill sites, the potential requirement for additional planning processes.

In general, units identified in the DPP short term housing supply have approved zoning, and in the case of registered plans, lots and blocks have been created. These sites are ready for site plan approval (if required), or the issuance of building permits. These units have the least amount of encumbrances to development, and therefore are the most likely to be constructed in the short term, though actual timing of construction will depend on the developer and market forces. Zoned townhouse and apartment infill units identified in the short term housing supply are those units that do not have any identified constraints to development, such as existing structures and/or a potential brownfields that could impose the requirement for additional, time consuming planning processes.

Units identified in the DPP medium term housing supply are either anticipated through draft approved plans of subdivision, and still requiring registration, or infill sites that have a known development constraint. The medium term housing supply generally entails a greater level of complexity, and often a greater amount of time is needed for additional planning process requirements before the units can be constructed.

Units identified in the long-term DPP housing supply are generally units proposed within preliminary plans, unofficial proposals, and expressions of development interest that the City anticipates will eventually come forward for draft plan approval of plan of subdivision. Preliminary infill proposals are not currently included under the long term supply within the DPP.

The unit counts that are presented in the infill chart on Schedule 7 – Map 2 are based on the actual number of units that have been proposed either through a rezoning application or as part of a site plan application. There are also a few examples where recent discussions with proponents on active infill

applications have resulted in unit yields exceeding what has been stated on Schedule 7 – Map 2 in the DPP. Table 2 (below) describes the development status of the infill townhouse and apartment sites, including sites that were identified in the DPP between 2008 and 2011 that have now been constructed. Of the 32 sites listed in Table 2, 20 (63%) have had some level of activity leading to development of the site within the last 3 years. Given these details, the City currently does not find reason to provide any level of discounting to these sites.

Table 2.
Development Status of Zoned Townhouse and Apartment Sites (Development Priorities Plan, 2008-2012)

ID	Type	Address	Units	Constraint	Development Status
A1	Apartment	95 Woodlawn Rd	90		
A2	Apartment	106 Sunnylea	8		2013 site plan submission
A3	Apartment	237 Janefield Ave	48		Renewed interest from local developers.
A4	Apartment	375 Edinburgh Rd	62	O	
A5	Apartment	College Ave W	42		
A6	Apartment	3 Gordon St	70	BF	Currently under construction
A7	Apartment	251 Exhibition St	22		
A8	Apartment	43 Speedvale Ave	71		
A9	Apartment	64 Duke St	88	BF O	
A1	Apartment	5 Arthur St S	390	BF O	Active brownfield cleanup, local developer
A1	Apartment	404 - 408 Willow	50	O	
A1	Apartment	Gemmel Lane	49	O	
A1	Apartment	120 Westmount	220		Phase 3 has been constructed - Phase 1 & 2
A1	Apartment	1291 Gordon St	161		2011 site plan submission
A1	Apartment	Silvercreek	350	BF	2010 zoning approval
A1	Apartment	781-783	15		2012 site plan submission
T1	Townhouse	72 York Rd	22	BF	2007 conditionally approved site plan, active
T2	Townhouse	16 Marilyn Dr	8		2012 site plan submission - 17 apartments
T3	Townhouse	288 Woolwich St	10	BF	
T4	Townhouse	515 Woolwich St	6	BF O	
T5	Townhouse	College/Hales/Mo	40	O	2012 site plan submission
T6	Townhouse	11 Cityview Dr S	28		
T7	Townhouse	64 Duke St	41	BF O	
T8	Townhouse	168 Fife Rd	14		2011 site plan submission; An additional ZC
T9	Townhouse	146 Downey Rd	45		Currently under construction
T1	Townhouse	39-47 Arkell Rd /	71		Zoning approved late 2011
T1	Townhouse	587 Victoria Rd N	14		2013 site plan approved
T1	Townhouse	180 Gordon St	11	BF	Approved for development in 2011.
NA	Townhouse	60 Cardigan St	39	BF O	2008 DPP - Constructed
NA	Townhouse	375 Watson Pky S	12		2008 DPP - Constructed
NA	Townhouse	35 Mountford St	124		2009 DPP - Constructed
NA	Apartment	1440-1448	87		2011 DPP - Constructed

Constraint legend:

BF – historic land uses indicate that this site may be a potential brownfield.

O – the site is currently occupied by an existing structure

Question 4.

Concern has been raised around the 'anticipated other intensification' and the basis for the number of units as reported on Schedule 5A of the DC Draft Growth Forecast (February 20th, 2013). The impression of the reviewer is that this estimate reflects the completion of subdivisions post the imposition of the built boundary line. Similarly to question 3, clarification was sought by City staff on this issue and it was clarified that the main concern is that the City's growth forecast has assumed that 100% of the 'anticipated other intensification' sites will be developed by 2031 and that no discount factor has been applied.

In short, the 'anticipated other intensification' housing summary does not account for units within plans of subdivision, including those units created through the completion of subdivisions in the built up area post imposition of the built boundary. Those units have been accounted for under the 'vacant registered units' or 'draft approved units' summaries for the built-up area. While there are a few instances where the City has approved plans of subdivision within the built-up area *after* the imposition of the built boundary, the housing units approved within those plans have also been summarized under the 'vacant registered units' and 'draft approved units' headings.

Concern was raised around the assumption that 100% of the units identified as 'anticipated other intensification' are assumed to be developed by 2031 with no discounting addressed within the Residential Intensification Analysis (RIA). The RIA is based on an inventory of sites capable of supporting intensification which is then assessed considering the likelihood of development prior to 2031. This inventory of sites was further reviewed against potential development constraints (brownfields, site history, policy directions, etc...) Following this assessment, the overall potential residential intensification inventory was discounted to remove the sites with the greatest constraints to development within the 2031 planning horizon. It is also anticipated that the City will continue to see infill projects occurring throughout the City on lands that were not originally identified as having intensification potential as part of the Residential Intensification Analysis.

Furthermore, the units identified as 'anticipated other intensification' in DC growth forecast are required in order for the City to plan to achieve the Growth Plan policy stipulating that by 2015, a minimum of 40% of future development must occur within the built-up area.

Question 5

The concern raised is that the City does not maintain a minimum 10 year supply of housing, as stated in Schedule 7 – Table 1 of the DPP, where the 2012 DPP lists the total years of housing supply at 9.4.

The housing supply as shown on Schedule 7 – Table 1 only accounts for anticipated supply generated through plans of subdivision and zoned infill townhouse and apartment sites. The table does not account for other lands that are designated and available for development as per PPS policy 1.4.1a), which would include supply potential on vacant lands ('other intensification' sites), applications for development with

fewer than 10 proposed units, units created through severance activity and the creation of secondary suites. The inclusion of these units would push the housing supply over and above the 10 year requirement.

PPU

Question 6.

In response to your recommendation, we have tested the impact of the gross population assuming a 10-year PPU average vs. 20 years. Using a 10-year average PPU results in a reduced weighted PPU of 2.42 from 2.43 (refer to Schedule 3 of DC growth forecast package). We are amenable to adjusting the average PPU for low and medium-density housing over the 2013 to 2023 period to reflect a 10-year average. However, we do not support an adjustment of the 20-year PPU average for high-density housing over the 10-year DC growth forecast. The data available to differentiate the average PPU for apartments aged 1-10 years is limited. As such, it is unclear if the lower average PPU for apartments experienced over the last 10 years, as a result of the absence of 3+ bedroom units, will materialize over the next 10 years. Our expectation is that with more emphasis on high-density housing construction, the City will experience some level of 3+ bedroom apartment construction over the next 10 years. As a result, it is our opinion that the average apartment PPU of 1.71 is a reasonable assumption for both the 10-year and buildout forecast.

Employment

Questions 8, 9 and 10

The forecast industrial GFA growth of 5.3 million sq. ft. over the 2013-2023 period (an average of 533,000 sq. ft. annually) is comparable to historical trends. A comprehensive review of historical development activity (new construction and expansions) based on gross floor area identified that the City averaged 495,000 sq. ft. of industrial GFA activity over the 2006-2012 period. In our experience, the industrial building permit data presented in dollar value identified in Schedule 10 provides some insights with respect to historical demand, however, our subsequent analysis of actual historical GFA provides a more accurate picture of recent industrial demand.

Over the 2001-2006 period, the City of Guelph experienced an increase of 905 industrial jobs (approx 180 per year). Over the 2006-2013 period, it is estimated that the City generated approximately 1,600 new industrial jobs (average of 320 per year). However, the net increase over the period was only 300 due to a number of significant industrial plant closures (estimated jobs losses totaling approx. 1,300) due to the 2008/09 economic recession. It is anticipated that industrial employment growth will be stronger over the next decade as macro economic conditions continue to improve.

It is acknowledged that our employment forecast is a policy driven, market influenced forecast. In the short-term, employment densities may not materialize (i.e. industrial employment growth may not match forecast industrial GFA growth) but over the longer term, we expect that employment densities will increase, generating the average GFA per industrial employee assumed. Any refinement to the average industrial employment density assumed for the City would have to be reviewed within the context of the City's next five year Official Plan (OP) review.

Question 11

Based on our buildout forecast, we estimate that approximately 17,500 jobs are to be accommodated on employment lands. As of 2012, the City has an estimated 310 net ha of employment land (with vacancy adjustment and allowing for potential conversions). Further, the City has approximately 50 net ha (with vacancy adjustment) of employment lands within the Guelph Innovation District which are expected to be developable over the 2013-buildout period. At a density of 46 jobs per net ha and 65 jobs per net ha¹ within the existing employment lands and those located in the Guelph Innovation District, respectively, the City can accommodate approximately 17,500 jobs on employment lands. Hence, at the employment densities identified in the Employment Lands Strategy, there is sufficient employment land to accommodate the buildout employment forecast.

Conclusions

As identified above, based on the City's current supply of urban residential and non-residential land within the City's Municipal Corporate boundary including the Guelph Innovation District (GID), but excluding lands designated Reserve Lands and Open Space/Park land in the Clair-Maltby Secondary Plan Area, the City has an adequate supply of urban land to meet its long-term growth forecasts (i.e. 10-year forecast for soft services and buildout for all remaining hard services).

¹ The employment lands within the Guelph Innovation District are expected to accommodate largely office commercial development, hence, the average density of 65 jobs per net ha, in accordance with lands designated Business Park, as identified in the Guelph Employment Lands Strategy.



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Memorandum

To/Attention	City of Guelph DC Team	Date	June 21, 2013
From	Audrey Jacob	Project No	33974
cc	Bob Stratford	Steno	
Subject	Guelph DC Growth Forecast - April 23, 2013 Response Letter from Watson & Associates		

Thank you for the responses to my questions. I have 2 ongoing concerns as noted below.

1. Response to Q4, last paragraph – *“Furthermore, the units identified as ‘anticipated other intensification’ in DC growth forecast are required in order for the City to plan to achieve the Growth Plan policy stipulating that by 2014, a minimum of 40% of future development must occur within the built up area.”*

While the achievement of 40% intensification commencing in 2015 is a requirement of the Growth Plan, it is irrelevant to a housing market forecast. The housing mix in 2001 was 61/14/15. Post 2001 there was a notional shift from low density to medium density; in 2006 the housing mix was 58/18/24 and by 2011 it was 59/18/23. By late 2023 it is forecast to be 54/21/25. The forecast shift by housing type is from low density to medium density over the next 10 years

The post 2023 housing forecast to build-out shows a dramatic change in the incremental housing mix to 16/37/47. This is a radical change from the historic trend.

In my view, the DC housing growth forecast in fact is not a forecast but a capacity estimate tailored to meet the Places to Grow intensification target. What is not demonstrated is that this is achievable. Given the information available, the City may in fact not be able to meet its population forecast.

A review of the draft approved and preliminary plans in the DPP indicate that many of the plans include apartment units. However, an observation of typical practice is that the low and medium density units build out first and that the apartment sites potentially remain vacant for a longer timeframe or are eventually converted to medium or lower density. Also, apartment units take a longer timeframe to bring on stream predominantly due to market demand but also due to characteristics around financing requirements related to minimum advance sales and construction timeframe.

While my observations really tread into the area of growth management and residential land needs, it raises a concern that the longer term forecast included in the DC may not be realized. If the forecast is unrealistic and the population is not delivered, the infrastructure will be planned to accommodate a higher population level.

This should be reviewed with each successive roll out of the DC bylaws.

2. Response to Q11 – notwithstanding the response, the recent/current employment density on employment lands in Guelph is substantially lower than what is presented in the Employment Land Study and is on the order of 30 empl/nha. If lower employment

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densities prevail, the City will not have sufficient land to accommodate the forecast employment.

MEMORANDUM

To:	Audrey Jacob	Fax	<input type="checkbox"/>
From:	Jamie Cook/City of Guelph DC Team	Courier	<input type="checkbox"/>
Date:	August 18, 2013	Mail	<input type="checkbox"/>
Re:	Guelph DC Growth Forecast – June 21, 2013 Response letter from Audrey Jacob , IBI Group	e-mail	<input type="checkbox"/>

Thank you for your response dated June 21, 2013 regarding the Guelph DC growth forecast. Our reply to your response related to questions 4 and 11 is provided below.

Question 4 – Anticipated Intensification

We do not agree that achievement of the Growth Plan 40% intensification target commencing in 2015 is irrelevant to the DC housing growth forecast. The DC growth forecast is directed by the City's recent planning and policy documents including, the City of Guelph Local Growth Management Strategy (LGMS), the City of Guelph Employment Land Strategy (ELS), the Guelph Innovation District (GID) Draft Secondary Plan, the Downtown Secondary Plan (OPA 43) and the City of Guelph Official Plan (OP) as amended by OPA 39, 42 and 48. These policy documents were developed as part of the City's Growth Plan conformity exercise and will be updated and reviewed as part of the City's ongoing five-year Official Plan review process. We agree that flexibility should be provided during the short-term period of the growth forecast to reflect recent market trends. This flexibility has been incorporated into the 10-year growth forecast. However, the longer-term DC assumptions (i.e. 2031 and/or buildout) regarding the amount, type and location of development must be generally consistent with the City's most recent planning and policy documents.

Question 11 – Employment Density on Employment Lands

As you are aware, the employment density assumed on employment lands was determined through the City of Guelph Employment Land Strategy (ELS). This study represents the City's Municipal Comprehensive Review (MCR) regarding employment lands. The average employment density assumed on future employment lands in the ELS was based on a comprehensive market assessment of existing employment density trends within the City of Guelph on lands designated general industrial and corporate business park. Any revisions to the assumed average density on employment lands will have an impact on the City's ability to meet the 50 persons and jobs density

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requirement set out in the LGMS. Accordingly, if adjustments are required to the average employment density on employment lands to more accurately reflect recent market trends they will have to be examined through an update to the ELS and coordinated with the City's future update to its LGMS, not as part of the DC Study process.

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2. With respect to the employment density (jobs/ha), I continue to disagree with the assumptions. I understand the challenge the City faces in terms of meeting Growth Plan Greenfield objectives, but given the City's history and recent trends, as outlined in the ELS, it is difficult to accept the employment densities assumed.
3. The industrial sq ft per worker also appears to be low in the context of recent trends discussed in Ph 2 of the ELS at Table 3-3. Taking information from MPAC combined with the information on Table 3-3 suggests floorspace per worker in new industrial space is on the order of 1,650 sf/emp compared to the 1,100 sf/emp identified on Sch 9B of the DC growth forecast.