

# Attachment-5 Downtown CPPS Engagement Response

Table 1: Downtown Planning Permit Response Matrix

ID	Date Received	Submitted by	Summary of Issue	Response
1.	January 16, 2026	Fusion Homes	Required affordable housing rate is too high at 15-25% effective rate	Revised facilities, services and matters framework with lower rates
2.	January 16, 2026	Fusion Homes	November feasibility report does not include parking, which is not realistic or feasible for purpose-built rental or condo development	A previous financial analysis in October, which was also posted, assumed 0.9 parking spaces per unit and has helped inform the facilities, services and matters. Several projects have submitted for pre-consultation and the development review process with little or no parking in the Downtown. In active applications, staff are receiving applications with no or effectively no parking in the Downtown Area and therefore requested that Watson provide an alternative financial analysis based on no existing parking.
3.	January 16, 2026	Fusion Homes	Market sales assumptions in feasibility reports are not consistent with current conditions	Watson used Altus as the base for sale prices in Downtown Guelph supplemented by assessment of local listings
4.	January 16, 2026	Fusion Homes	Development costs are undercosted in financial analysis. Analysis specifically misses construction, financing, legal, and Tarion costs.	Watson used credible sources for development costs. Square foot costs use Gordian Square Foot Costs with RSMMeans 2025 reference, which captures both hard and soft construction cost components. Financing costs (including construction interest and carrying costs) are modeled separately and explicitly incorporated in the pro forma. Tarion enrolment and warranty costs are also included in the models.

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5.	January 16, 2026	Urban Design Strategies	Required affordable housing is too high at 15% effective for the development.	Revised facilities, services and matters framework with lower rates
6.	January 16, 2026	Urban Design Strategies	CPPS should update Official Plan designation and CPP precinct for Woods 2 site. Requested High Density Residential (HDR), with openness to Downtown 2 (D2)	Met with proponent to discuss precincts. Woods has requested alternative precinct which has been implemented in the CPP by-law.
7.	January 19, 2026	Comment received through Have Your Say Page / Konveio Comment	If the city plans to establish a single low density zone, shouldn't the requirements meet the original minimums for RL.2? (9m frontage/275m2 area). Why make the RL.1 minimums? Why make it harder for people to develop? A large majority of the homes in this new CPPS area don't have 15 meters of frontage to being with, and silly enough the majority are already zoned RL.2 ... the city is restricting growth and development more than promoting it.	The updated CPP By-law revises the Low Density Residential precinct standards to use the RL.2 Zone standards. The development standards maintain the existing site permissions and better reflect the existing built form in the Downtown's residential neighbourhoods.

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8.	January 19, 2026	Comment received through Have Your Say Page / Konveio Comment	What would be the criteria for someone to qualify for one of the affordable units: rented or purchased? Is it income based or first come first serve system?	The affordable price or rent is based on the definition of "affordable residential unit" in Province's Affordable Residential Units for the Purposes of the Development Charges Act, 1997 Bulletin which aligns with the City's Housing Affordability Strategy definition. Once the CPP By-law comes into force, the City is planning to develop Guidelines to manage and administer the affordable units.
9.	January 19, 2026	Comment received through Have Your Say Page / Konveio Comment	With the plan for affordable units, what would be in place to stop people from buying at the affordable rate and then renting it out to someone else at market value?	Agreements will safeguard affordable requirements. These agreements, will be registered on title (CPP By-law Section 1.10.2). The agreements will require that any affordable unit is maintained at the required affordable sale or rental price for the duration of the affordability period in the agreement.
10.	January 19, 2026	Comment received through Have Your Say Page / Konveio Comment	Who enforces this? By law staff or will their be designated planning staff monitoring this to ensure the area are being used as intended?	The CPP By-law will be enforced by City Guelph Planning and Building staff, similar to the Zoning By-law. The CPP By-law will replace the Zoning By-law in areas where it is in effect. Zoning Inspectors will administer the by-law including responding to complaints to ensure that sites are constructed and maintained in compliance with the CPP By-law.
11.	January 19, 2026	Comment received through Have Your Say Page / Konveio Comment	Is there a way to ensure the units classified as "affordable", are not just loft style apartments but at least 1 or 2 bedrooms? A loft style would only benefit a small group of people. Recommend some wording to make this less discretionary.	The unit mix for affordable units will be negotiated. Staff will have regard to City of Guelph housing needs and advance best practices that encourage a mix of unit sizes (2- and 3-bedroom).

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12.	January 22, 2026	Comment received through Have Your Say Page / Konveio Comment	Protected views hinder density and urbanization, increase housing costs, and stifle housing supply growth. It is a NIMBY policy which trades the housing secures' enjoyment of minor aesthetic benefits for increased cost of living of the housing insecure. I suggest that protected views be dropped altogether.	The view corridors and maximum building heights were updated in OPA 106. Revisions of the maximum heights and/or view corridors is not within the scope of the project. The protected views were maintained by MMAH when approving OPA 80.

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13.	January 22, 2026	Comment received through Have Your Say Page / Konveio Comment	<p>Parking minimums should be dropped altogether. Any “free” parking units have their cost hidden in higher prices for housing, goods, and services. Parking minimums result in an oversupply of parking which drives up development costs and rent. It reduces density and makes downtowns less human-scaled and more sprawling. It encourages driving downtown over walking, transit, and biking. The correct downtown parking minimum is 0. This has been done successfully in Edmonton, Vancouver, Buffalo, London England, Paris France, etc. Parking minimums are outdated, harmful, and need to be removed.</p>	<p>The proposed Downtown CPP By-law does not have minimum required parking. Section 5 (Parking) has design standards for parking and requirements for bicycle parking. The draft by-law carried forward site specific amendments to the Zoning By-law in Section 7, some of which included Council approved amendments to parking.</p>

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14.	January 22, 2026	Comment received through Have Your Say Page / Konveio Comment	Emergency shelters are restricted to Downtown 1 (D1)-only which is the same as nightclubs and distilleries. This is overly-restrictive on emergency shelters and sends the wrong message. They are not even discretionarily allowed in other city precincts but outright prohibited. Services for the most vulnerable people should be the most accessible. At minimum, emergency shelters should be discretionarily allowed across all precincts and the ethical thing to do is permit them across all precincts.	The permissions for Emergency Shelters follow the existing zoning permissions. Revising permissions is not in the scope of the CPPS project. Supportive housing as of right is permitted across residential zones in the City with the 2023 comprehensive zoning by law.
15.	January 22, 2026	Comment received through Have Your Say Page / Konveio Comment	Please consider increasing maximum height of a fence located in the interior side yard to 2.5 metres to match the rear yard. This is in regard to the new maximum building height in Low Density Residential (LDR) precincts of 4 stories.	The fence height provisions are unchanged from the existing Zoning By-law. In the CPP By-law, staff can approve an increase to height as a Class 2 staff level variation without the need for a report to be considered by Council. In the Downtown CPP By-law, building heights are not determined by precincts.

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16.	January 23, 2026	Comment received through Have Your Say Page / Konveio Comment	Which are we to refer to? 6.1.2 or (single-detached dwellings/multi-unit buildings; table 6.7), where are the Low Density Residential (LDR) apartment requirements?	Apartment buildings in the LDR are limited to a maximum of three units. Table 6.3 outlines the development standards for apartment buildings up to three units in all residential precincts in the LDR.
17.	January 28, 2026	Upper Grand School Board	Reference is made in the Draft CPP Bylaw to the placement of portable classrooms on a school site if the school site was in existence before January 1, 2007, being a development exempt from a CPP. Under Bill 17 of the Protect Ontario by Building Faster and Smarter Act, 2025 there were changes made to the Planning Act which exempted the placement of portable classrooms at all public school sites from site plan control. Therefore, this reference and timing is no longer applicable and should be removed.	O.Reg 173/16 Section 4(2)(k) requires that CPP By-law states that the placement of a portable classroom on a school site of a district school board is exempt from the requirement for a community planning permit if the school site was in existence on January 1, 2007. As the O.Reg is specific about the exemption and the date cut-off, the CPP By-law needs to include the January 1, 2007 reference.

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18.	January 28, 2026	Upper Grand School Board	School board staff continually monitor new residential plan proposals due to the impact on student enrolment and the need to plan for future school accommodation needs. In our discussion, we requested that the school board be notified on all residential pre-consultation meetings regardless of the permit class and especially those where the development is immediately adjacent to a school board property and where the number of residential units being proposed is 10 units and greater	Pre-consultation, complete application, and decision of approval circulation lists will be updated include the Upper Grand School Board on all projects that propose 1) ten or more units within the CPP Area or 2) any size that abuts Upper Grand School Board property.
19.	January 30, 2026	Up Consulting	Affordable housing rate is too high. Recommend maximum of 5 per cent consistent with Inclusionary Zoning Tiered phase-in approach will discourage projects from building out full heights in OPA 106. Concerns about significant (33%) requirement on upper floors in phase-in and baseline in permanent.	The proforma analysis was used to identify the amount of facilities, services and matters that could be requested as a portion of the additional heights being considered to be permitted in the Draft CPP By-law, when prioritizing affordable housing. A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. FSM has been revised with lower rates.

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20.	January 30, 2026	Up Consulting	Add clearer transition or exemption provisions (1.2) for projects with Zoning By-law Amendment, Official Plan Amendment, and Site Plan applications. Projects with site specific provisions should be exempt from CPPS provisions	For projects with an in-progress Zoning By-law amendment or appeal to the Ontario Land Tribunal, the CPP By-law has clearer transition provisions. In-progress Zoning By-law Amendments or appeals to the Ontario Land Tribunal that are deemed complete when the Downtown CPP By-law is approved will have the site specific requests incorporated into the CPP By-law once the applications are resolved. Projects with active Zoning By-law Amendments or appeals to the Ontario Land Tribunal that have not yet filed a complete Site Plan application could continue under the current Site Plan process if the application is within two years of the CPP By-law's effective date, as long as the Site Plan application is consistent with the site specific precinct. Any further variations would require a Community Planning Permit application.
21.	January 30, 2026	Up Consulting	Staff level development standard variations are too low. Recommend increasing to minimum 20%	Variations for Class 2 applications have been developed in the context of existing Zoning By-law provisions and other City objectives. The City is trying to balance the extent of variations with other City goals in the Zoning By-law and Official Plan. As well, the variations also responded to feedback from public and internal parties. In the final draft, some variations, such as floorplate size, has been revised upward to provide more flexibility.

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22.	January 30, 2026	Up Consulting	Recommend revising Class 2 notification to match Class 1 (no notification required).	The notification requirements for the Guelph CPPS go beyond the Provincial regulatory requirements. The public notification for Class 2 applications was developed in response to public engagement in Stone-Edinburgh and Downtown. Members of the public valued being informed of projects.
23.	January 30, 2026	Up Consulting	Conditions b The completion of required studies, plans and/or other documents, h The verification of site remediation, k The efficient use or conservation of energy or water, and q Orderly growth and development of Section 1.12.3 are overly broad and not quantifiable. Conditions must not be beyond Planning Act authority.	Condition b (studies) allows staff to defer the completion of required studies until after the application. It provides flexibility for applicants to be able to make an application without 100% study completion. Condition h (site remediation) is tied to a Record of Site Condition, which is a quantifiable deliverable. The proposed conditions are compliant with the Planning Act and O.Reg 173/16 requirements for the CPPS.
24.	January 30, 2026	Guelph Chamber of Commerce	Facilities, services and matters selectively revises height permissions downtown. 33% of height in OPA 106 doesn't work	A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. FSM has been revised with lower rates.

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25.	January 30, 2026	Guelph Chamber of Commerce	Effective rate of affordable housing in policy is 20%. Inclusionary Zoning is capped at 5% and paused until 2027	The CPPS and Inclusionary Zoning are different tools. The CPPS requires that FSM be demonstrated to show a proportional relationship between the quantity or monetary value of the FSM and the height or density of development that may be permitted. Guelph went beyond the CPPS regulations and provided a financial analysis to demonstrate feasibility of adding affordable housing into market residential development. Another key difference between the CPPS and IZ is that IZ can require affordable housing on the entire gross floor area while CPPS is based on increased height or density. While the Province has paused IZ for three municipalities, the Province has not revised Ontario Regulation 173/16. OPA 106 provides for significant increase in height and density, and this lift in land value is implemented through the CPP By-law.

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26.	January 30, 2026	Guelph Chamber of Commerce	General statement that financial analysis doesn't contemplate real development economics	<p>The financial analysis included prototypical development scenarios in order to identify the amount of facilities, services and matters that could be requested as a portion of the additional heights being considered to be permitted in the Draft CPP By-law. It is understood that each developer would have different approaches to financial analysis to determine if a development is viable and this is very context and market sensitive. The CPP By-law is proposing to provide a framework to permit additional height in exchange for facilities, services and matters that will inform development for decades to come, and the proforma is reviewing a point in time based on a number of development assumptions. The general proforma provided by Watson includes industry standards for cost of development, operating costs of the various development scenarios, the potential revenue streams, and presents return on investment (R.O.I.) and Net Present Value (NPV). For each development scenario, a 25-year cash flow was prepared and several development parameters were adjusted to test sensitivities (e.g. parking rates, contingency levels). The results were used to determine the benefit of the additional height being considered to be provided as of right for development to help inform how much facilities, services and matters the City will request through the tool.</p>

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27.	January 30, 2026	Guelph Chamber of Commerce	Requested actions for staff to meet with development community to determine: How the CPPS can provide genuine value through its 45-day approval timeline and the real-world economic constraints that currently limit the delivery of affordable housing."	Staff are meeting with all interested parties who have provided comment or who are interested in further discussion.
28.	January 30, 2026	Fitzrovia	Facilities, services and matters on OPA 106 heights are procedurally unfair and inconsistent with Planning Act. OPA 106 heights should be achievable as-of-right. Recommend removing FSM on OPA 106 heights.	The CPPS and Inclusionary Zoning are different tools. The CPP By-law implements OPA 106. Within the OPA, Policy 11.1.7.2.7 states that a CPPS for the Downtown may establish a framework for implementing the maximum building heights of the Official Plan and the required facilities, services and matters. As such, the FSM requirements of the CPP By-law implement Policy 11.1.7.2.7. During the consultation of OPA 106, it was determined that increase heights and density in Downtown should commensurate with public amenities so that the growth in people and jobs is supported by community benefits.

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29.	January 30, 2026	Fitzrovia	Tiered phase-in and permanent facilities, services and matters does not comply with provincial policy that caps Inclusionary Zoning at 5%. Recommend that proposed affordable housing and facilities, services and matters requirements be removed from by-law	The CPPS and Inclusionary Zoning are different tools. The CPPS requires that FSM be demonstrated to show a proportional relationship between the quantity or monetary value of the FSM and the height or density of development that may be permitted. Guelph went beyond the CPPS regulations and provided a financial analysis to demonstrate feasibility of adding affordable housing into market residential development. Another key difference between the CPPS and IZ is that IZ can require affordable housing on the entire gross floor area while CPPS is based on increased height or density. While the Province has paused IZ for three municipalities, the Province has not revised Ontario Regulation 173/16. OPA 106 provides for significant increase in height and density, and this lift in land value is implemented through the CPP By-law.

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30.	January 30, 2026	Fitzrovia	Transition and exemption provisions for in-progress Official Plan Amendments (OPA), Zoning By-law Amendment (ZBA), and Site Plan applications. Recommend developments with complete OPA, ZBA and/or site plan applications be exempt from CPPS	For projects with an in-progress Zoning By-law amendment or appeal to the Ontario Land Tribunal, the CPP By-law has clearer transition provisions. In-progress Zoning By-law Amendments or appeals to the Ontario Land Tribunal that are deemed complete when the Downtown CPP By-law is approved will have the site specific requests incorporated into the CPP By-law once the applications are resolved. Projects with active Zoning By-law Amendments or appeals to the Ontario Land Tribunal that have not yet filed a complete Site Plan application could continue under the current Site Plan process if the application is within two years of the CPP By-law's effective date, as long as the Site Plan application is consistent with the site specific precinct. Any further variations would require a Community Planning Permit application.
31.	January 30, 2026	Fitzrovia	Staff level variations are too low. Provincial regs already allow up to 10% for some standards. Recommend 20% variation threshold for Class 2.	Variations for Class 2 applications have been developed in the context of existing Zoning By-law provisions and other City objectives. The City is trying to balance the extent of variations with other City goals in the Zoning By-law and Official Plan. As well, the variations also responded to feedback from public and internal parties. In the final draft, some variations, such as floorplate size, have been revised upward to provide more flexibility.

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32.	January 30, 2026	Grand Highland Home Builders Association	Requiring affordable housing on OPA 106 heights is selective and punitive claw-back on permissions	A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. FSM has been revised with lower rates.
33.	January 30, 2026	Grand Highland Home Builders Association	Effective rate of 33% affordable housing is 20% in buildings.	A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. FSM has been revised with lower rates.
34.	January 30, 2026	Grand Highland Home Builders Association	No legislative basis for workaround of IZ. CPPS facilities, services and matters is meant to be above and beyond the heights otherwise permitted.	O.Reg 173/16 specifically states that facilities, services and matters "may be within the ranges set out under clause (2)(c)", which states that CPP By-laws "Set out a list of minimum and maximum standards for development". OPA 106 always contemplated the implementation of the heights through a CPP By-law. Section 11.1.7.2.7 of OPA 106 states "...the Community Planning Permit System may establish a framework for implementing the maximum building heights of the Official Plan and required facilities, services and matters.

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35.	January 30, 2026	Grand Highland Home Builders Association	Inclusionary Zoning only works in strong development market. Watson's financial analysis does not accurately reflect development costs with overstated revenues and understated costs. Provides links to Kitchener, Markham, Ottawa, Waterloo, and Whitby financial assessments.	The CPPS and Inclusionary Zoning are different tools. While the Province has proposed to pause IZ for the 3 municipalities, these are markets with their own unique planning context. Guelph too has its own unique local market and planning context. In particular, OPA 106 provides for significant increase in height and density, and this lift in land value is captured in the proforma for the CPPS. It has demonstrated that with increase in height and density, the inclusion of affordable housing units has no negative net impact to the feasibility of development.
36.	January 30, 2026	Grand Highland Home Builders Association	Premature to pass CPP By-law while Comprehensive Zoning By-law appeal is ongoing	Staff are coordinating closely with our colleagues managing the CZBL appeal. To the greatest extent, the CPP By-law will incorporate any agreed upon changes to development standards. If there is not a resolution on the appeal by the time the CPP By-law is scheduled to move forward, the Downtown and Stone-Edinburgh CPP By-laws will be amended as part of a housekeeping update to ensure that applicable standards are consistent.
37.	February 2, 2026	Aird Berlis (on behalf of Skyline)	33% affordable housing requirement is not realistic.	A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. FSM has been revised with lower rates.
38.	February 2, 2026	Aird Berlis (on behalf of Skyline)	Affordable housing provisions are premature and should be removed and reviewed at a later date	A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. FSM has been revised with lower rates.

39.	February 2, 2026	Aird Berlis (on behalf of Skyline)	<p>Planning Act limits municipalities to 5% max in Inclusionary Zoning. If affordable housing is required, suggest requiring a cap of 5% of overall unit count for by-law</p>	<p>Under the CPPS framework, FSM may be required in exchange for a specified height or density of development, which may be within or outside those ranges prescribed by the By-law. In addition, Ontario Regulation 173/16 requires that the CPP By-law establish a proportional relationship between the quantity or monetary value of the FSM that may be required and the height / density of development that may be allowed. City's proforma has demonstrated the proportional relationship between requirements for affordable housing and increase in heights, and it has also demonstrated financial feasibility of including affordable housing market residential developments.</p> <p>The CPPS and Inclusionary Zoning are different tools. The main difference between CPPS and IZ is that the CPPS framework requires that FSM be demonstrated to show a proportional relationship between the quantity or monetary value of the FSM and the height or density of development that may be permitted. However, Guelph went above and beyond the CPPS framework and provided a financial analysis to demonstrate feasibility of adding affordable housing into market residential development. Another key difference between the CPPS and IZ frameworks is that IZ requirement for affordable housing is required on the entire gross floor area while CPPS is based on increased height or density, provides for cash-in-lieu as an alternative and is based on the scale of development proposed. While the Province has proposed to pause IZ for the 3 municipalities, the Province has not revised Ontario Regulation 173/16. OPA 106</p>
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				provides for significant increase in height and density, and this lift in land value is implemented through the CPP By-law.
40.	February 2, 2026	Aird Berlis (on behalf of Skyline)	Add transition/exemption provisions for projects with deemed complete or approved Zoning By-law Amendment.	For projects with an in-progress Zoning By-law amendment or appeal to the Ontario Land Tribunal, the CPP By-law has clearer transition provisions. In-progress Zoning By-law Amendments or appeals to the Ontario Land Tribunal that are deemed complete when the Downtown CPP By-law is approved will have the site specific requests incorporated into the CPP By-law once the applications are resolved. Projects with active Zoning By-law Amendments or appeals to the Ontario Land Tribunal that have not yet filed a complete Site Plan application could continue under the current Site Plan process if the application is within two years of the CPP By-law's effective date, as long as the Site Plan application is consistent with the site specific precinct. Any further variations would require a Community Planning Permit application.
<b>Subsequent Follow Up Letters</b>				
41.	March 6, 2026	Woods Development Group	CPP By-law's affordable housing requirements create inequitable impacts and unviable sites across downtown amongst others that are unaffected.	Facilities, services and matters have been amended to a flat rate for all floors within the heights granted through OPA 106. OPA 106 always contemplated the implementation of the heights through a CPP By-law. Section 11.1.7.2.7 of OPA 106 states "...the Community Planning Permit System may establish a framework for implementing the maximum building heights of the Official Plan and required facilities, services and matters."

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42.	March 6, 2026	Woods Development Group	CPPS is ad hoc Inclusionary Zoning.	The CPPS and Inclusionary Zoning are different tools. The CPP By-law implements OPA 106. Within the OPA, Policy 11.1.7.2.7 states that a CPPS for the Downtown may establish a framework for implementing the maximum building heights of the Official Plan and the required facilities, services and matters. As such, the FSM requirements of the CPP By-law implement Policy 11.1.7.2.7. During the consultation of OPA 106, it was determined that increase heights and density in Downtown should be commensurate with public amenities so that the growth in people and jobs is supported by community benefits.
43.	March 6, 2026	Woods Development Group	Open that density provided in OPA 106 required to make the project viable, including costs to redevelop property and meet market land costs for downtown.	The CPP By-law implements the OPA 106 heights as-of-right through a streamlined process. Municipalities can require community benefits in exchange for additional heights as these heights have impacted project viability as indicated. Affordable housing has been identified as the community benefits due to the needs identified in the Housing Affordability Strategy.
44.	March 6, 2026	Woods Development Group	Inclusionary Zoning requires subsidized housing costs are borne by depreciating the value of land, which can render projects unviable if the land values decrease too much.	OPA 106 contemplated the use of facilities, services and matters through a CPP By-law to implement the increased heights. The heights were not enabled as-of-right in the Zoning By-law. Currently, a Zoning By-law Amendment is required to achieve the OPA 106 heights. CPPS is not Inclusionary Zoning. The CPPS requires an exchange of height or density for community benefits. OPA 106 provided benefits through additional heights to be realized through the provision of affordable housing.

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45.	March 6, 2026	Woods Development Group	Other large-scale site developments downtown were recipients of tax incentive programs, like the Brownfield, Heritage, and Downtown Community Improvement Plans (CIP), and none required affordable housing.	Guelph's <a href="#">Affordable Housing Community Improvement Plan (CIP)</a> program provides grants for homeowners, landlords, non-profits and homebuilders to add a new affordable housing unit to their property. The New Affordable Residential Unit Grant provides up to \$25,000 for each affordable housing unit. The CPPS can also be paired with separate tax incentives offered by the City. The Affordable Housing CIP and Development Charge exemptions are both available for affordable housing provided on-site.
46.	March 6, 2026	Woods Development Group	Effective affordable housing rate for development is 15%, three times Province's 5% Inclusionary Zoning limit.	A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. Facilities, services and matters has been revised with lower rates. The CPP includes a flat rate within OPA 106 heights. The facilities, services and matters above OPA 106 heights are in line with Stone-Edinburgh CPP and heights would require Council permission.
47.	March 6, 2026	Woods Development Group	Project is multi-phased and will extend beyond the 2029 phase-in period. Each phase requiring Class 3 Council approvals.	Through the Urban Design Master Plan (UDMP), staff are committed to working with the development team to create a predictable development framework for the phased development. Staff have proposed to update the precinct to better match the proposed development in the UDMP to reduce the likelihood of Class 3 development applications for each phase.

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48.	March 6, 2026	Woods Development Group	If CPP By-law passes as proposed, the project would be withdrawn.	Development and policy staff are committed to working with the development team to work through the Urban Design Master Plan and the development to realize a successful project.
49.	March 6, 2026	Woods Development Group	Recommended Alternative 1: redrafting the Downtown CPP By-law to mirror the Stone-Edinburgh By-law which requires affordable housing over the permitted heights.	OPA 106 included a robust public engagement to establish those heights as well as a policy stating that facilities, services and matters would be required to reach OPA 106 heights. Included in the OPA were careful assessments of service capacity for additional height downtown.
50.	March 6, 2026	Woods Development Group	Recommended Alternative 2: Implement Inclusionary Zoning to provide consistent impacts across downtown	Public feedback was supportive of the CPP tool. The flexibility of the CPP By-law's facilities, services and matters, including cash-in-lieu and in-kind contributions, is a strength of the CPPS that is not possible in Inclusionary Zoning.
51.	March 6, 2026	Woods Development Group	Recommended Alternative 3: Step back and reconsider the broader issues of affordability and housing supply in Guelph, which requires genuinely reducing taxation and over-regulation.	The Downtown CPP By-law is a key policy in ensuring that the City is 'housing ready' downtown. The project is included in the City's Housing Accelerator Fund (HAF) commitments and implements the OPA 106 heights. Delaying the will require developments to go through a supplemental Zoning By-law Amendment process to achieve the OPA 106 heights.
52.	March 11, 2026	Grand Highland Home Builders Association	Stone/Edinburgh CPPS was a straightforward bonusing of density for which the affordability provisions were sought only above the permitted heights.	OPA 106 always contemplated the implementation of the heights through a CPP By-law. Section 11.1.7.2.7 of OPA 106 states "...the Community Planning Permit System may establish a framework for implementing the maximum building heights of the Official Plan and required facilities, services and matters."

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53.	March 11, 2026	Grand Highland Home Builders Association	Imposing affordable housing requirements on OPA 106 heights is retroactive Inclusionary Zoning on an ad hoc, urban design basis.	The CPPS and Inclusionary Zoning are different tools. The CPP By-law implements OPA 106. Within the OPA, Policy 11.1.7.2.7 states that a CPPS for the Downtown may establish a framework for implementing the maximum building heights of the Official Plan and the required facilities, services and matters. As such, the FSM requirements of the CPP By-law implement Policy 11.1.7.2.7. During the consultation of OPA 106, it was determined that increase heights and density in Downtown should be commensurate with public amenities so that the growth in people and jobs is supported by community benefits.
54.	March 11, 2026	Grand Highland Home Builders Association	Inclusionary Zoning, which is paused until 2027, is capped at 5%. Kitchener's IZ policy phases in IZ requirements, starting at 2%.	The CPPS and Inclusionary Zoning are different tools. The CPPS requires that FSM be demonstrated to show a proportional relationship between the quantity or monetary value of the FSM and the height or density of development that may be permitted. Guelph went beyond the CPPS regulations and provided a financial analysis to demonstrate feasibility of adding affordable housing into market residential development. Another key difference between the CPPS and IZ is that IZ can require affordable housing on the entire gross floor area while CPPS is based on increased height or density. While the Province has paused IZ for three municipalities, the Province has not revised Ontario Regulation 173/16. OPA 106 provides for significant increase in height and density, and this lift in land value is implemented through the CPP By-law.

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55.	March 11, 2026	Grand Highland Home Builders Association	Proposed 33% affordable housing requirement on OPA 106 heights have an effective rate of 20%, which is four times higher than IZ policy permits.	A financial analysis was used to identify the amount of FSM that could be requested as a portion of the additional heights provided in OPA 106. The City recognizes the current challenging market conditions. FSM has been revised with lower rates.
56.	March 11, 2026	Grand Highland Home Builders Association	There is significant risk that the policy will be over-ridden by the Province and/or tied up under appeal, with the long timelines that implies, which is the opposite of what the tool is supposed to be promoting: the expediting of development within this strategic planning area.	City staff cannot predict the direction of future Provincial policy. Appeal rights are an inherent aspect of the system, and the City will work with appellants and address appeals on a general or site-specific basis through mediation or through the Ontario Land Tribunal (OLT) to implement the CPP By-law as quickly as possible.