



GRAND HIGHLANDS

HOME BUILDERS' ASSOCIATION

Mayor Guthrie & Members of Council
City of Guelph
1 Carden St.
Guelph ON

April 10, 2026

Re: Council Planning Decision Meeting – April 15, 2026 | Item: 7.1 Downtown Community Planning Permit Decision Report, 2026- 124

Mayor Guthrie and Members of Council,

The Grand Highlands Home Builders' Association (GHHBA) is submitting the following comments, as well as attaching an opinion commissioned from SV Law, as Council considers the approval of the Downtown Community Planning Permit System (CPPS).

The GHHBA appreciates the amount of work, as well as the effort to consult, that staff has undertaken in the development of the policy in a short period of time.

Council should not approve the CPPS as presented on April 15th. The attached opinion lays out in detail how the policy strays from provincial direction in terms of the Downtown CPPS's application of Facilities, Services and Matters (FSM) on approved building heights. Given that the CPPS is based around the Class 2 affordable housing framework, the policy should be returned to staff for reconsideration and a new approach.

We encourage Council to take the time to consider the other submissions that continue to object to the details of the Downtown CPPS Class 2 and 3 permit requirements.

The GHHBA submit that the Downtown CPPS policies as presented are still unworkable and represent bad planning. The proposed by-law still creates inequity and severe adverse impacts unevenly across the downtown and are a form of retroactive housing taxation on sites that had heights approved by council, without appeal, last year. These are some of the most complicated and expensive projects to bring to market in the city and cannot bear this additional burden.

Housing affordability is a concern to everyone in the sector, but the proposed Downtown CPPS will not be productive in addressing supply or produce lower-cost housing.

In general, the GHHBA supports efforts to streamline housing approvals and policy development that allows building more efficiently and effectively in the community. The CPPS could be an effective tool to incentivise investment in the downtown through speed and efficiency, but not as currently written. The



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downtown is the key strategic growth area for the city, and the GHHBA encourages Council to support this segment of the industry that has been particularly hard hit in the housing market downturn. We look forward to Council's leadership on this issue and to further refinements on the plan before adoption.

Respectfully submitted,

Lisa Schuett,
President, Grand Highlands Home Builders' Association

Attachment:

SV Law Letter - dated April 8, 2026



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