

WOOD DEVELOPMENT GROUP  
*Creating Space for Life*

April 10, 2026

TO: GUELPH CITY COUNCIL

RE: **Council Planning Meeting, April 15, 2026 -- Item 7.1 - Downtown CPPS - 2026-124**

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Mr. Mayor, Members of Council;

We are writing to comment on the updated Downtown Community Planning Permit System (CPPS) by-law being presented on April 15, 2026 for potential adoption.

We have delegated and written about the earlier draft and have had good contact with city staff as they refined and developed this new version. We want to acknowledge the huge amount of work this has taken staff to bring a whole new development approval framework together for the downtown in the time they have had to do it, and we appreciate their willingness to consult as they were under these deadlines.

That said, there remain issues that we need to identify for Council.

PLANT NO. 2

Our second draft of the Plant No. 2 UDMP is under review by staff and we remain hopeful that it will be able to be presented to Council by the summer.

The new version of the CPPS and its companion OPA supports the forthcoming Plant No. 2 Urban Design Master Plan. We appreciate the amendment of Official Plan land designation to 'Mixed-Use 2' and the CPPS precinct assignment to 'D2'. These changes position the site much closer to the UDMP vision however remain generic which may require future Class 3 variations to fully align.

We had submitted a handful of specialised regulations that would create full alignment but staff have chosen not to include in the by-law ahead of the UDMP. Our planner, Urban Strategies, will outline in separate correspondence the suggested site specific regulations that did not make it into the version being presented and would ask Council to consider directing staff to include site-specific regulations for Plant No. 2 through the CPPS.

One of the unique Plant No. 2 issues the CPPS process raises is how large multi-phased sites that are governed by master plans navigate through successive Class 2/3 negotiations. We were hoping that the CPPS would provide language that recognized the role of Official Plan required UDMP's in establishing Council-endorsed approval frameworks for phased, long-term site redevelopments like ours. This recognition would provide a level of confidence in future individual CPPS applications coming forward to negotiate Class 3 approvals to future Councils, and perhaps, if not included in the CPPS can be addressed as our UDMP comes to Council in the

coming months. Having to rely on future Class 3 negotiations creates a lack of certainty we weren't anticipating in the CPPS process.

### 39 ELIZABETH – OPA MAPPING

Late-breaking news is that we have, within the last month, acquired 39 Elizabeth Street, the 'missing tooth' of our project area north of the Guelph Junction Rail.

OPA 114 shows 39 Elizabeth excluded from the proposed 'Mixed-Use 2' area and we would request this map be updated or recognized prior to Council approval of the OPA.



**OPA 114 Schedule C mapping should be updated to include rear of 39 Elizabeth as part of the proposed 'Mixed-Use 2' area.**

### VARIATIONS SCOPE

We continue to encourage Council to support staff in being bolder in terms of the level of variation staff are delegated under Class 2 permits. While staff have increased the range (now from 5% to 30% depending on the regulation) since the January draft, we can still see situations that may routinely generate Class 3 Council decisions and/or the applicant choosing to avoid the Class 3 process and build a compromised development.

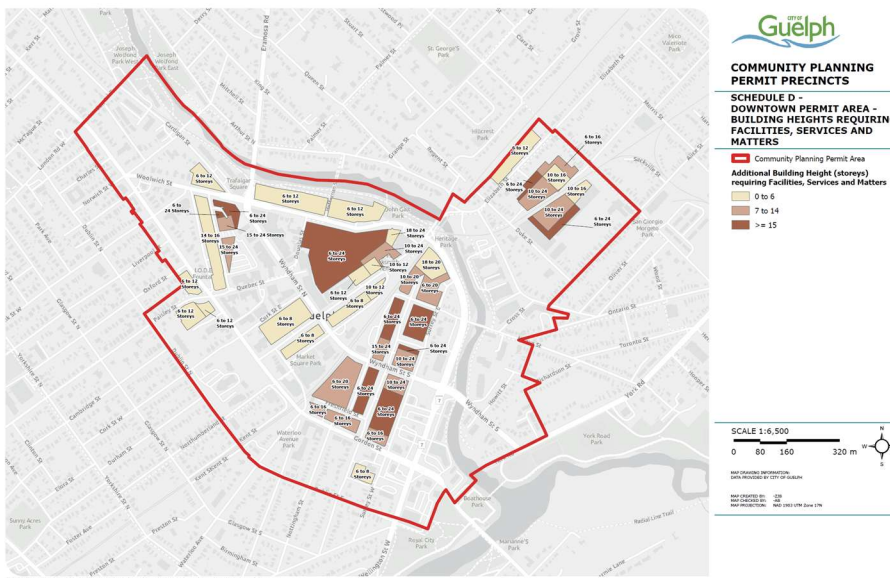
We would ask Council to support greater flexibility of 25% or more across staff identified regulations to enable staff to resolve site approvals outside the need for Council deliberation as the future Committee of Adjustment.

### CLASS 2/3 FACILITIES, SERVICES and MATTERS APPROACH

The negative impacts of Downtown CPPS have been greatly reduced since its initial unveiling in January. Significantly, the Class 2 and 3 requirements for including affordable housing within already permitted heights has come down from 33% to 5% within the Schedule D map.

While the change is significant, and likely brings sites much closer to viability, the larger question remains: Why is this the tool through which Council is choosing to impose a new cost on housing when the initiative is supposed to implement already approved heights, and the sites are some of the trickiest in the city to redevelop? This approach adds risk that projects will not start or creates additional burden on home buyers, renters and administrators if projects move forward.

Imposing the provision of affordable housing units on specific sites, or even the payment of cash-in-lieu, is a financial impact only these identified sites bear across the entire city. We submit that the approach remains fundamentally flawed and even with the reduced percentage requirements, will not produce the results anticipated.



**The Downtown CPPS creates a new cost on housing only on the properties and storeys identified on this map. Nowhere else in the city does this exist.**

**In either providing the required affordable units or paying cash-in-lieu, these sites are devalued against all other properties in the city.**

**This is not effective housing-first policy development.**

In summary, this is a major policy and development project that has gone from draft to final in the space of four months. It has major impacts on future growth of downtown, a key component of the community's economic and housing strategy. The community is continuing to identify flaws in the by-law and we urge Council to take their time with implementing this change. Do not let the glimmer of Housing Accelerator funding override sound local decision-making and policy development.

Take the time needed to make this an effective development approval tool.

Yours sincerely

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