

## **Submission to Guelph City Council**

**Re: Agenda Item 7.1 – Downtown Community Planning Permit System (CPPS) Bylaw**

**Meeting Date:** Wednesday, April 15, 2026

**Submitted by:** Guelph Community Health Centre

### **Introduction**

The Guelph Community Health Centre (Guelph CHC) is writing in response to Agenda Item 7.1, the proposed Downtown Community Planning Permit System (CPPS) Bylaw, which is coming before Council for a final decision on April 15, 2026.

As a community health organization, we are committed to improving the health and wellbeing of people in Guelph, particularly those facing health, social and economic barriers. From our perspective, housing is a foundational determinant of health. We welcome and support the intent of the Downtown CPPS as a tool to accelerate housing supply and to integrate affordability considerations into the development approvals process. We also recognize that no single policy tool can, on its own, deliver the scale of affordable housing required to meet community need. With that in mind, we want to share a concern that we believe Council should carefully consider before adopting the bylaw as proposed.

The CPPS represents a thoughtful framework aimed at streamlining approvals, reducing timelines, and linking increased height and density to community benefit through affordable housing contributions. We commend City staff for the work that has gone into its development. It is precisely because we support this overall direction that we are urging Council to ensure the requirements are realistic, equitable, and aligned with a broader, system-wide affordable housing strategy.

### **Our Concern: Affordability Requirements Must Not Become a Barrier to Building**

While we support the policy's intent, we encourage Council to closely examine whether the affordability requirements tied to height and density bonusing are appropriately calibrated to current market conditions and applied in a way that is fair and consistent.

Our concern relates specifically to the use of fixed affordability contribution requirements as a condition of accessing increased height and density. Unlike more flexible or discretionary incentive structures, fixed thresholds allow little room to respond to changing project economics. In the current environment, that rigidity may determine whether a project proceeds or remains unbuilt.

The private development sector is operating in a particularly challenging economic climate. Rising construction costs, elevated interest rates, and tighter financing conditions have already resulted in project delays and cancellations across Ontario. In this context, placing mandatory affordable housing contributions on individual market-rate developments—especially in the downtown core, where land values and construction complexity are high—creates a real risk that otherwise viable projects will no longer move forward.

If affordability thresholds under the CPPS render market-rate development infeasible, the outcome will not be more affordable housing. It will be less housing overall. Projects that stall or are cancelled do not deliver affordable units, and they do not house people.

We are also concerned that relying on site-specific affordability contributions can result in an uneven approach, where individual projects are asked to shoulder affordability obligations in ways that are not consistently or equitably distributed across the city. This risks undermining both housing supply and public confidence in the fairness of the system.

## Recommendations

The Guelph Community Health Centre respectfully asks Council to consider the following as it deliberates on the Downtown CPPS Bylaw:

- 1. Develop a system-wide plan, and approach to affordable housing that ensures complementary public investment.**

The Guelph Community Health Centre urges Council to recognize that the private sector cannot be the primary mechanism for delivering deeply affordable housing, particularly through site-specific requirements that effectively ask individual developments to carry a disproportionate share of responsibility.

Relying on ad hoc affordability contributions tied to individual sites risks creating an inequitable approach, where some projects are required to deliver affordability “because they can,” rather than as part of an intentional, consistent, city-wide strategy. While these tools may contribute incrementally, they cannot deliver the scale of investment needed to achieve the goals outlined in the City’s Affordable Housing Strategy.

The CPPS can be an important component of a broader housing framework, but it must be paired with sustained public investment, a shared mindset shift about how affordable housing is delivered, and strong partnerships with non-profit, co-operative,

and community-based housing providers. Continued advocacy to senior levels of government for dedicated, long-term affordable housing funding will also be essential.

Only through a coordinated, system-level approach—one that aligns policy tools with public investment and community partnerships—will Guelph be able to meaningfully increase the supply of affordable housing and meet the needs of residents most at risk.

## 2. **Build in a review and adjustment mechanism.**

We recommend that the bylaw include a clear provision for periodic review of affordability contribution requirements, allowing them to be recalibrated as market conditions change, without requiring a full bylaw amendment.

### **Conclusion**

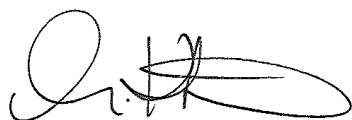
The Guelph Community Health Centre supports the adoption of a Downtown Community Planning Permit System that advances both housing supply and affordability in our community.

We ask that Council adopt a bylaw whose requirements are achievable under current market conditions, applied in a fair and consistent manner, and situated within a broader strategy that recognizes the limits of what the private market can deliver on its own and fully engages the non-profit sector in the broader plan and solutions.

Addressing Guelph's affordable housing needs will require sustained public investment, strong partnerships, and coordinated action across sectors. When aligned with these broader efforts, the CPPS can play a constructive role in supporting a healthier, more equitable community.

Thank you for the opportunity to provide input on this important decision. We would be pleased to discuss these comments further and support this ongoing work.

Respectfully submitted,



**Chief Executive Officer**  
Guelph Community Health Centre