



**Zelinka Priamo Ltd.**

LAND USE PLANNERS

**VIA EMAIL**

February 6, 2025

Guelph City Clerk  
City of Guelph  
City Hall, 1 Carden Street  
Guelph, ON  
N1H 3A1

Attention: Mr. Dylan McMahon, Acting General Manager / City Clerk

Dear Mr. McMahon:

**RE: City Council – Planning, February 11, 2025: Item 4.1  
Statutory Public Meeting  
Proposed Downtown Heights Official Plan Amendment  
Comments on Behalf of Guelph Watson Holdings Inc.  
115 Watson Parkway (Formerly 72 Watson Road North)  
Guelph, Ontario**

**Our File: TCT/GPH/25-02**

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We are the planning consultants for Guelph Watson Holdings Inc. (“GWHI”) for the Proposed Downtown Heights Official Plan Amendment. GWHI are the owner of vacant lands in the City of Guelph known municipally as 115 Watson Parkway North (formerly 72 Watson Road North) (the “subject lands”).

GWHI has submitted a Zoning By-law Amendment application (file no. OZS24-015) for a proposed mixed-use development, which includes four mixed-use residential buildings between 9 and 14 storeys.

On January 28, 2025, GWHI was made aware of the Proposed Downtown Heights Official Plan Amendment. Based upon our review of the Notice of Open House and Public Meeting, it is our understanding that the purpose of the public meeting is to consider public comments, which will be further reviewed by Staff before making a recommendation to Council for decision at a future Meeting. On behalf of GWHI, we have preliminary comments as outlined below for the Proposed Downtown Heights Official Plan Amendment and may provide further comments as required.

On behalf of GWHI, we have the following preliminary comments:

- **The Proposed Downtown Heights Official Plan Amendment includes policy amendments that would be applicable City-wide as opposed to being limited to the Downtown;**
- Amended Policy 8.8.1 Mid-rise buildings is proposed to change to "... which generally means a building between four (4) and eleven (11) storeys" from "which generally means a building between four (4) and six (6) storeys", while amended Policy 8.9.1 High-rise buildings is proposed to change to "which generally means buildings above twelve (12) storeys" from "which generally means buildings above

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six (6) storeys”. **With the proposed amendments, two of the proposed buildings on the GWHI lands subject to the Zoning By-law Amendment application would be considered Mid-rise as opposed to High-rise, which may have implications for the proposed buildings;**

- Draft Policy 8.8 (ii), Built Form: Mid-rise Buildings states, “mid-rise buildings greater than six (6) storeys in height shall be required to incorporate a stepback along the front facade. The exact location of this stepback is not prescribed but should generally fall between the second and sixth storeys of the building”. **In our submission, the proposed required stepback would be more appropriate as an urban design guideline, whereby “shall” should be revised to “should”, in order to provide for flexibility to account for site context and as a stepback may not be appropriate for all sites and buildings; and**
- Draft policy 8.9 (ii) Built Form: High-rise Buildings states “tall buildings shall be required to incorporate a stepback along the front facade; The exact location of this stepback is not prescribed but should generally fall between the second and sixth storeys of the building;”. **In our submission, the proposed required stepback would be more appropriate as an urban design guideline, whereby “shall” should be revised to “should”, in order to provide for flexibility to account for site context and as a stepback may not be appropriate for all sites and buildings.**

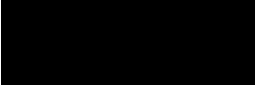
We would welcome the opportunity to meet with Staff to discuss our comments further.

Please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as Notice of the approval of the Proposed Downtown Heights Official Plan Amendment.

Should you have any questions, or require further information, please do not hesitate to call.

Yours very truly,

**ZELINKA PRIAMO LTD.**

  
Jonathan Rodger, MScPI, MCIP, RPP  
Principal Planner

cc. Guelph Watson Holdings Inc .(via email)  
Aird & Berlis LLP (via email)