



Zelinka Priamo Ltd.

LAND USE PLANNERS

VIA EMAIL

April 4, 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, April 8, 2025 Meeting
Item 6.1: Statutory Public Meeting and Decision Downtown Heights
Study Official Plan Amendment (2025-141)
Proposed Downtown Heights Official Plan Amendment (OPA 106)
Comments on Behalf of Guelph Watson Holdings Inc.
115 Watson Parkway (Formerly 72 Watson Road North)
Guelph, Ontario**

Our File: TCT/GPH/25-02

We are the planning consultants for the City of Guelph Proposed Downtown Heights Official Plan Amendment Review (OPA 106) for Guelph Watson Holdings Inc. who 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”).

On behalf of Guelph Watson Holdings Inc., Zelinka Priamo Ltd. has been monitoring the ongoing Downtown Heights Study. On February 6, 2025, we provided comments for the Proposed Downtown Heights Official Plan Amendment. On March 20, 2025, we received a Notice of Decision Meeting where a revised Draft Official Plan Amendment (OPA106) will be considered for adoption at the April 8, 2025 City Council – Planning Meeting. We reviewed Draft OPA 106, the Background Report dated March 2025 and Staff Report dated April 8, 2025 and we note that the Staff Report does not include a response to our comments dated February 6, 2025.

From the Staff Report, it is our understanding that Staff recommend that OPA 106 be approved. It is also our understanding that the purpose of the Council Planning Meeting on April 8, 2025, is for City Staff to provide a recommendation to Council, for the public to speak with Council and for Council to make a decision for Draft OPA 106.

On behalf of GWHI, we have the preliminary comments as outlined below and we will continue to review Draft OPA 106 in more detail and may provide further comments as required.

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

- Draft Policy 8.9.1(ii) Built Form: High-rise Buildings states “podiums of tall buildings shall generally range between 2 to 6 storeys, sized to generally align with existing heights along the street frontage; where an existing context does not exist, the

maximum podium height shall generally be established at the width of the right-of-way”, while related Draft Policy 8.9.1(iii) 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”.

The Background Study dated March 2025 states that “To ensure that tall buildings still establish an appropriate pedestrian-scale relationship with the street, a new policy is introduced which requires a stepback along the front facade. The location of the stepback is not prescribed and flexibility is provided to allow new development to respond to its local context. Additional guidance regarding the scale of the podium is also introduced, identifying that it shall generally range between 2 to 6 storeys.”

In the context of the Downtown Heights Study for which Draft OPA 106 has been prepared and the Staff Report that notes on page 3 that “The proposed Official Plan Amendment applies to the Downtown Secondary Plan area”, we request confirmation as to whether Draft Policies 8.9.1(ii) and 8.9.1(iii) are intended to apply City-wide or would only apply to the Downtown Secondary Plan area.

In addition, in our submission there is a lack of clarity between a podium under Draft Policy 8.9.1(ii) that “shall generally range between 2 to 6 storeys” and a stepback under Draft Policy 8.9.1(iii) that “should generally fall between the second and sixth storeys”. We request confirmation that a stepback can be achieved by providing a podium.

Lastly, we reiterate that in our submission the proposed required stepback under Draft policy 8.9.1(iii) 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, MScPl, MCIP, RPP
Principal Planner

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