



Zelinka Priamo Ltd.

LAND USE PLANNERS

April 10, 2026

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

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

**Re: April 15, 2026 City Council Planning Meeting
Item 5.2 Decision Report 115 Watson Parkway North Proposed Zoning
By-law Amendment and Draft Plan of Subdivision, 2026-134
Application for Zoning By-law Amendment (OZS24-015)
Application for Draft Plan of Subdivision (OZS25-014)
Proposed Mixed-use Development
Guelph Watson Holdings Inc.
115 Watson Parkway North
Guelph, ON**

Our File: TCT/GPH/22-04 and TCT/GPH/25-01

We are the planning consultants for the above-noted applications for Guelph Watson Holdings Inc. ("GWHI") 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 Decision Report 115 Watson Parkway North Proposed Zoning By-law Amendment and Draft Plan of Subdivision, 2026-134 (the "Staff Report") will be considered at the City Council Planning meeting on April 15, 2026. We have reviewed the Staff Report, including the Recommended Zoning, Regulations, and Conditions (Attachment 3), Recommended Draft Plan Conditions (Attachment 4), the Draft Zoning By-law mapping (Attachment 7) and Staff Review and Planning Analysis (Attachment 11). From the Staff Report, it is our understanding that Staff recommend that the Zoning By-law Amendment application be approved in accordance with the recommended zoning regulations and mapping and that the Draft Plan of Subdivision application be approved for three (3) years in accordance with the recommended draft plan conditions. At this time, the draft By-law for Council consideration has not yet been released for review.

While GWHI supports the recommendations for approval, on behalf of GWHI, we have the comments as outlined below. We will continue to review the Staff Report in more detail and may provide further comments as required.

We have the following comments for the Recommended Zoning and Regulations (Attachment 3A) and Staff Review and Planning Analysis (Attachment 11):

1. Section 18.8.9.c).xxii, Minimum Tower Setback: Attachment 3A includes the recommended regulation "Despite Table 7.4, the tower portion of a building may be setback a minimum of 1 metre from an interior side lot line and rear lot line when measured perpendicularly from the exterior wall of the *second* [emphasis added] storey."

Based on the proposed development, the tower portion of the proposed mixed use buildings begins the setback above the first storey as opposed to the second storey.

Accordingly, we request that the regulation in Section 8.8.9.c).xxii, be revised to **“Despite Table 7.4, the tower portion of a building may be setback a minimum of 1 metre from an interior side lot line and rear lot line when measured perpendicularly from the exterior wall of the first storey.”**

2. Section 18.8.9.d).xlii, Minimum Distance Between Buildings: While Attachment 3A includes the recommended regulation “Despite additional regulation 4(a) for Tables 6.17 to 6.19, a minimum of 3 metres is permitted between the exterior side walls of one townhouse building to another townhouse building on exterior side walls containing opening to habitable rooms”, based upon the draft Zoning By-law regulations that were discussed with Staff, a regulation was requested to permit a minimum distance between any two buildings on the same lot of 2.8 m in order to provide flexibility for the accommodation of the back-to-back townhouses in the event that any minor adjustments are required to building placement.

Accordingly, we request that the regulation in Section 18.8.9.d).xlii of the final Zoning By-law be revised to **“Despite additional regulation 4(a) for Tables 6.17 to 6.19, a minimum of 2.8 metres is permitted between the exterior side walls of one townhouse building to another townhouse building on exterior side walls containing opening to habitable rooms.”**

3. Section 18.8.9.d).xxvi Minimum Common Amenity Area (On-Street and Back-to-Back Townhouses): Attachment 3A includes the recommended regulation “Despite Table 6.18, a minimum common amenity area of 7.9 square metres per dwelling unit is required for back-to-back townhouses.”

As it is our understanding from the Urban Design Comments dated January 28, 2026 that amenity spaces cannot be labelled as snow storage areas if they are meant for community use, revising the minimum common amenity area to 4.4 sq. m per dwelling unit from 7.9 sq. m will account for snow storage only during winter months within the common amenity areas and ensure that the site concept plan is zoning compliant. We note that with the provision of the 0.71 ha Neighbourhood Park, a significant portion of the subject lands will provide for additional amenity to future residents.

Accordingly, we request that the regulation Section 18.8.9.d).xxvi of the final Zoning By-law be revised to **“Despite Table 6.18, a minimum common amenity area of 4.4 square metres per dwelling unit is required for back-to-back townhouses.”**

4. A regulation was requested that stated “To permit a minimum front yard along Watson Parkway North and an exterior side yard on Watson Road North of 2 metres for the mixed-use buildings, whereas Table 7.3, Row A requires a minimum of 3 metres.”

The Staff Review and Planning Analysis Staff Response states “Staff do not support the reduced front yard setback. The overhead hydro stretches across the majority of the building and a reduced setback would not leave sufficient room for street tree planting. As per the Tree Technical Manual, trees are to be planted a minimum of 4.5 metres from overhead hydro and are to be planted a minimum 1 metre from the property line. Although, a setback of 5 metres would be more appropriate the minimum required in the Zoning By-law is only 3 metres.”

In our submission, the proposed minimum setback of 2 m compared with the required minimum of 3 m is beneficial for providing for sufficiently sized commercial floor plates that are efficient and attractive to commercial tenants. In addition, as outlined in the Urban Design Brief from July 2025, "... while future improvements to Watson Parkway North are being implemented by the City, the proposed design includes a 2.0-metre front yard setback for the mixed-use buildings. This setback provides sufficient space for soft landscaping elements, including low shrubs and accent flowering trees, contributing to an attractive and pedestrian friendly environment ... Additional boulevard street trees will be integrated within boulevard along the expanded sidewalk and bicycle pathway zone. The selected species are suitable for planting beneath existing hydro infrastructure and have been chosen for their moderate to high urban tolerance, in accordance with the City of Guelph's Technical Manual Guidelines" (p. 25). Therefore, the 2.0 m minimum setback can accommodate on-site soft landscape elements and street tree planting, where the details as to the tree species can be determined at Site Plan Approval.

Accordingly, we request that a regulation be included under Section 18.8.9.c) of the final Zoning By-law as follows: **"Despite Table 7.3, a minimum front yard along Watson Parkway North and an exterior side yard on Watson Road North of 2 metres is required for mixed-use buildings."**

5. A regulation was requested that stated "To permit a minimum of one required parking space for the uses specified in Section 5.2.1 (a) to be located a minimum distance of 1.95 metres from the street line and to the rear of the front wall of the main building for end units, whereas Section 5.2.1 requires that (a) For every single detached dwelling, semi-detached dwelling, on-street townhouse, rear access on-street townhouse, duplex dwelling, and multiunit buildings with 3 dwelling units or less, the following provisions apply: (i) One required parking space for the uses specified in 5.2.1 (a) shall be located a minimum distance of 6 metres from the street line and to the rear of the front wall of the main building."

The Staff Review and Planning Analysis Staff Response states "Staff do not support this request. The intent of this zoning regulation is to ensure that driveways are of a sufficient length so vehicles do not over-hang onto the street and sidewalks. This request applies to end units of back-to-back townhouses."

For Blocks 3L and 3O, while three (3) of the end homes of the back-to-back townhouses have substandard driveway lengths, each of these end homes will have one parking space in the garage attached to each townhouse, which fulfills the requirement for one legal parking space per townhouse. The three (3) substandard driveways in Blocks 3L and 3O are not intended for occupants to park cars; they are simply the drive aisle that connects the road to the garage where the vehicles will be parked. To ensure the substandard driveway lengths for these end homes in Blocks 3L and 3O are not used for vehicle parking, a proposed "Parking and Motor Vehicles clause" can be included in the condominium declaration for the common elements condominium. This wording permits vehicles to be parked only in the home's designated parking area (i.e., the garage) and prohibits any parked vehicle from intruding into any other part of the condominium plan. This means no parked vehicle can overhang into the common elements. Since the substandard driveway lengths are short and would result in parked vehicles overhanging into the common elements, this wording is designed to prohibit this from occurring. GWHI proposes that in the site plan, condominium, and/or subdivision agreement, the

City includes a requirement to use this wording in the condominium declaration. In addition, the City can make it a condition of approval of the common elements condominium plan to include this wording in the declaration along with an obligation for the condominium board to enforce this obligation.

Accordingly, we request that a regulation be included under Section 18.8.9.d) of the final Zoning By-law as follows: **“Despite Section 5.2.1 (a), a minimum of one required parking space for back-to-back townhouse units is permitted to be located a minimum distance of 1.95 metres from the street line and to the rear of the front wall of the main building for end units.”**

6. Regulations were requested as follows:

- “To permit a minimum dwelling unit width of 6.4 metres for back-to-back townhouse units, whereas Table 6.19, Row B, requires a minimum unit width of 7 metres”;
- “To permit a minimum dwelling unit width of 5.7 metres for on-street townhouse units, whereas Table 6.12, Row C, requires a minimum unit width of 6 metres”; and
- “To permit a minimum lot frontage per dwelling unit of 5.4 metres, whereas Table 6.10, Row B, requires a minimum of 6 metres”.

The Staff Review and Planning Analysis Staff Response states “The ... three site-specific requests are not supported by staff. Minimum dwelling unit widths and lot frontages help ensure sufficient space for residents and help manage the balance of density and quality of life. Minimum lot frontages ensure that there is enough room for landscaping and a driveway.”

In our submission, the proposed minimum widths will provide for efficient development of the subject lands that are located within a Strategic Growth Area. The street townhouses at 5.7 m and back-to-back townhouses at 6.4 m as proposed are of sufficient width and size to comfortably accommodate a family and, moreover, are a standard dimensioned unit compared to similar projects in southern Ontario. Floor plans for street townhouses and back-to-back townhouses were prepared by Turner Fleischer Architects Inc. to provide examples of units with the proposed minimum widths.

Accordingly, we request that the regulations be included under Section 18.8.9.d) of the final Zoning By-law as follows:

- **“Despite Table 6.19, B, a minimum dwelling unit width of 6.4 metres for back-to-back townhouse units is permitted.”**
- **“Despite Table 6.12, C, a minimum dwelling unit width of 5.7 metres for on-street townhouse units is permitted.”**
- **“Despite Table 6.10, B, a minimum lot frontage per dwelling unit of 5.7 metres is permitted.”**

7. As part of the final zoning review during the coordination of the draft Zoning By-law with Staff, as noted in the Staff Report, additional regulations were requested including:

- Request to include a regulation regarding first storey transparency for non-residential uses. The applicant has requested that 30 % of the surface area of

the first storey of a building up to 4.5 metres from the ground along the street frontage of Watson Parkway North, shall be comprised of transparent windows and/or active entrances when a building is within 15 m of an existing and proposed arterial and/or collector road, as identified in the City's Official Plan in force and effect on the effective date" in order to provide flexibility as well as clarity to intent for the non-residential uses along Watson Parkway, whereas the Table 7.4 of the Zoning By-law requires a minimum of 40%.

The Staff Review and Planning Analysis Staff Response states "the applicant recently requested ... regulations that have not been fully reviewed and are not supported by staff".

In our submission, the Table 7.4 requirement related to transparent windows and/or active entrances should not be applicable to residential uses and the reduction to 30 percent for non-residential uses will allow for flexibility for internal operations in order to accommodate commercial tenant needs.

Accordingly, we request that a regulation be included under Section 18.8.9.c) of the final Zoning By-law as follows "**Despite Table 7.4, for non-residential uses, 30 % of the surface area of the first storey of a building up to 4.5 metres from the ground along the street frontage of Watson Parkway North, shall be comprised of transparent windows and/or active entrances when a building is within 15 m of an existing and proposed arterial and/or collector road, as identified in the City's Official Plan in force and effect on the effective date.**"

8. As part of the final zoning review during the coordination of the draft Zoning By-law with Staff, as noted in the Staff Report, additional regulations were requested including:
 - o For the General Provisions and Parking, additional suggestion that the by-law includes that Sections 5.2.2, 5.2.3 and 5.4 (b) do not apply; New requests – not supported.

The Staff Review and Planning Analysis Staff Response states "the applicant recently requested ... regulations that have not been fully reviewed and are not supported by staff".

Section 5.2.2 provides General Provisions for Parking for the back-to-back, stacked back-to-back townhouse and apartment buildings. In order to accommodate the site concept plan as proposed and for clarity as to interpretation, in our submission Section 5.2.2 should not be applicable.

Accordingly, we request that a regulation be included under Section 18.8.9.b) of the final Zoning By-law as follows "**Section 5.2.2 shall not apply.**"

We have the following comments for the Recommended Draft Plan Conditions (Attachment 4):

9. Condition 86 states "Prior to *registration of the plan* [emphasis added], the Developer shall provide Payment in-lieu of Parkland Conveyance for the balance of the development, in accordance with the City of Guelph Official Plan Policies."

According to the Staff Report, "Cash-in-lieu will be required and will be assessed through a valuation acquired at the time of building permit" (p. 10).

In order to reflect the Staff Report and GWHI's preference, we request that Condition 86 be revised to state **"Prior to issuance of building permit, the Developer shall provide Payment in-lieu of Parkland Conveyance for the balance of the development, in accordance with the City of Guelph Official Plan Policies."**

We recognize that the Proposed Conditions of Site Plan Approval, (Attachment 3B), are included for information since there is currently no Site Plan Approval application. However, we have the following comments:

10. The proposed condition of Site Plan Approval 5 states "That, prior to site plan approval or prior to Draft Plan of Subdivision approval, the Owner/Developer shall enter into a road occupancy agreement with the City that identifies the Owner/Developer's responsibility to pay for the following: All improvements identified in the functional design for the intersections and Right of Way including traffic signals at Starwood Drive and Watson Parkway North."

According to the Staff Analysis, "staff comments regarding the traffic signal warrant analysis remain unresolved. Staff are of the opinion that the introduction of the fourth leg of the intersection and the site-generated traffic are the primary contributors to the need for signalization. Therefore, it is required that the Developer will be 100% responsible for the design and construction of the new traffic signals."

We request that the Developer (GWHI) contribution towards the design and construction of the new traffic signals be determined during Site Plan Approval based on technical evidence.

Accordingly, appropriate wording at this stage would be as follows **"That, based on additional discussions with the City prior to site plan approval or prior to Draft Plan of Subdivision approval, the Owner/Developer shall enter into a road occupancy agreement with the City that identifies the extent of the Owner/Developer's responsibility to pay for the following: ..."**

For ease of reference, the requests are provided in Appendix A, attached to this letter.

Should you have any questions, or require further information, please do not hesitate to contact the undersigned. Please note that along with Zelinka Priamo Ltd., GWHI will be present at the April 15, 2026 Council Planning Meeting to depute and ask questions.

Yours very truly,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, RPP, MCIP
Principal Planner

cc. Guelph Watson Holdings Inc. (via email)

APPENDIX A

Requested New and Modified Zoning Regulations

1. Section 18.8.9.c).xxii: revise to “Despite Table 7.4, the tower portion of a building may be setback a minimum of 1 metre from an interior side lot line and rear lot line when measured perpendicularly from the exterior wall of the first storey.”
2. Section 18.8.9.d).xlii: revise to “Despite additional regulation 4(a) for Tables 6.17 to 6.19, a minimum of 2.8 metres is permitted between the exterior side walls of one townhouse building to another townhouse building on exterior side walls containing opening to habitable rooms.”
3. Section 18.8.9.d).xxvi: revise to “Despite Table 6.18, a minimum common amenity area of 4.4 square metres per dwelling unit is required for back-to-back townhouses.”
4. New regulation under 18.8.9.c): “Despite Table 7.3, a minimum front yard along Watson Parkway North and an exterior side yard on Watson Road North of 2 metres is required for mixed-use buildings.”
5. New regulation under 18.8.9.d): “Despite Section 5.2.1 (a), a minimum of one required parking space for back-to-back townhouse units is permitted to be located a minimum distance of 1.95 metres from the street line and to the rear of the front wall of the main building for end units.”
6. New regulations under 18.8.9.d):
 - “Despite Table 6.19, B, a minimum dwelling unit width of 6.4 metres for back-to-back townhouse units is permitted.”
 - “Despite Table 6.12, C, a minimum dwelling unit width of 5.7 metres for on-street townhouse units is permitted.”
 - “Despite Table 6.10, B, a minimum lot frontage per dwelling unit of 5.7 metres is permitted.”
7. New regulation under 18.8.9.c): “Despite Table 7.4, for non-residential uses, 30 % of the surface area of the first storey of a building up to 4.5 metres from the ground along the street frontage of Watson Parkway North, shall be comprised of transparent windows and/or active entrances when a building is within 15 m of an existing and proposed arterial and/or collector road, as identified in the City's Official Plan in force and effect on the effective date.”
8. New regulation under 18.8.9.b): “Section 5.2.2 shall not apply.”

Requested Modifications to Recommended Draft Plan Conditions

9. Revise Condition 86 to state “Prior to issuance of building permit, the Developer shall provide Payment in-lieu of Parkland Conveyance for the balance of the development, in accordance with the City of Guelph Official Plan Policies.”

Requested Modifications to the Conditions of Site Plan Approval

10. Revise proposed condition of Site Plan Approval 5 to state “That, based on additional discussions with the City prior to site plan approval or prior to Draft Plan of Subdivision approval, the Owner/Developer shall enter into a road occupancy agreement with the City that identifies the extent of the Owner/Developer’s responsibility to pay for the following: ...”