

**WESTON
CONSULTING**

planning + urban design

City of Vaughan
2141 Major Mackenzie Drive
Vaughan ON
L6A 1T1

Attn: Jeffrey Abrams, City Clerk

Dear Sir,

RE: Community Area Policy Review for Low-Rise Residential Designations Adoption of Urban Design Guidelines for Infill Development in Established Low-Rise Residential Neighbourhoods

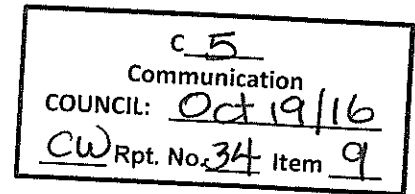
Weston Consulting is the planning consultant for Centra (Keele) Inc., the registered owner of the lands in the City of Vaughan municipally known as:

1. 9785 and 9797 Keele Street and a parcel known as PCL-176; and
2. 9560 and 9570 Keele Street (collectively the 'subject lands').

This letter is provided in response to the guidelines prepared by Urban Strategies Inc., dated September 2016 entitled *Urban Design Guidelines for Infill Development Establishment Low-Rise Residential Neighbourhoods* (herein referred to as 'Guidelines'). This letter is further to the correspondence provided on May 31, 2016 in response to the document entitled *Draft Policy Review: Vaughan Community Areas and Low-Rise Residential Areas Study* dated January 2016.

The above noted lands are designated Low Rise Residential in the City of Vaughan Official Plan ('VOP') and are within the Maple Heritage Conservation District. We have submitted development applications for the subject lands, which are under review.

We have reviewed the Guidelines dated September 2016, which are being recommended for Committee of the Whole's approval on October 5th, 2016. We are of the opinion that the updated Guidelines do not appropriately address the consideration of infill development through condominium roads and we are concerned that the prescriptive nature of the guidelines will lead to an in-appropriate application of certain development standards that are better suited to be addressed through planning policies and zoning by-law regulations. The Townhouse Infill Guidelines in particular, although they are intended for infill townhouse development on Arterial Roads, do not facilitate the level of intensification that in our opinion, is appropriate for Arterial Roads. As such, we offer the following comments on the proposed updated Guidelines dated September 2016. We do not support the Guidelines in their present form and recommend certain modifications be made to address our concerns.



October 5, 2016
File 6728/6729

In our opinion, the above guidelines do not address or consider the nature and intention of infill development in a balanced manner. Moderate intensification is appropriate in low rise residential areas along Arterial Roads with transit access and is often achieved by replacement of low rise residential dwelling types with other low rise residential types (ie. single detached dwelling to semi-detached dwellings, etc.). To facilitate this, it is unreasonable to achieve precise conformity with the surrounding area in an infill setting as there could be great variety between the immediate adjacent lots and the context. Furthermore, the existing condition in many cases, may not represent the overall neighbourhood context as a whole or its planned function.

While we understand that Section 1.2 of the Guidelines contemplates a degree of flexibility in the interpretation of the guidelines, we are concerned that the precise guidelines may be applied more rigidly, which in our opinion, is inappropriate. It is our opinion that official plan policies that are further implemented by zoning regulations should set out the framework for infill developments, rather than guidelines. In our opinion, guidelines should set out themes and principles to guide development, but should not be similar to zoning regulations.

Setbacks and Privacy

The following guidelines related to setbacks and privacy within the General Low-Rise Residential Infill Guidelines:

4.12 Front yard setbacks should be consistent with the front yard setbacks of adjacent houses and houses immediately across the street. Where there is a uniform setback along a street, it should be matched by the new dwelling(s). Where there is variation in setbacks, the front yard setback of the new dwelling(s) should be the average of that of adjacent development. In no neighbourhoods should the front yard setback be less than 4.5 metres.

4.13 Side yard and rear yard setbacks should be consistent with the prevailing pattern of setbacks in the immediately surrounding residential area. A minimum rear yard setback of 7.5 metres should be maintained. The rear portion of the house should not create adverse shadow or overlook conditions on the adjacent properties.

5.5 Front yard setbacks for units fronting the arterial street should be a minimum of 4.5 metres and should be consistent across the site. A minimum of 50% of the front yard should consist of soft landscaping. Deciduous trees are encouraged.

5.6 Interior side yard setbacks should be a minimum of 1.5 metres, and end units flanking a public street should be setback a minimum of 4.5 metres from the street.

5.10 The rear of the townhouse unit should be setback by 12 metres from the rear laneway. A minimum of 3 metres landscaped buffer from the rear property line to the rear laneways should be provided.

5.11 Each Townhouse dwelling should have a private backyard, fenced or screened with landscaping for privacy.

Further to the above, although the suggested minimum front back setback of 4.5 metres has been reduced from the originally proposed 5 metres to be more consistent with Zoning By-law 1-88, it does not allow for any flexibility for properties situated adjacent to existing dwellings with a setback less than 4.5 metres after road allowance consideration. Many proposed townhouse developments are along Arterial Roads with generous road allowances which have been considered within the site plan design, creating a setback far greater than the existing context of some adjacent lots. In addition, there are conditions where existing lots have generous rear yards abutting the rear yards of proposed dwellings and as such, reduce the concern of privacy and overlook. We recommend that developments should be assessed on a site specific basis through the appropriateness of zoning regulations rather than guidelines in relation to yard conditions.

Townhouse Infill Guidelines

The following guidelines relate to orientation and condominium roads within the Townhouse Infill Guidelines:

4.11 Dwellings should be oriented to the street with their front entrance visible from a public street.

5.1 Townhouses dwellings should be oriented to and have their front entrance on a public street; alternatively, they may front a public park. Private driveways or laneways should not be used to provide frontage for Townhouses either flanking the street or located at the rear of dwellings fronting the street. Such a condition would create a front-to-side or front-to-back condition that would adversely affect the rear privacy of adjacent dwellings or dwellings on the same lot that front the street.

The above guidelines as drafted would preclude the opportunity for dwellings to be configured on a condominium road. With appropriate streetscape conditions, front yard landscaping and dwelling entrances condominium roads can be designed similar to public road standards and can facilitate a more efficient and optimal configuration of access, connections, shared amenity spaces and parking areas. This proposed guideline represents a significant modification to a well-accepted practice of implementing infill development in the City and we suggest this guideline be removed or revised to permit condominium road infill developments.

In relation to the Townhouse Infill Guidelines Summary on Page 18 and 19 of the proposed Guidelines, we suggest that many of the specific guidelines are not realistic to achieve and are balanced with the objectives of intensification along Arterial Roads. Furthermore, they do not recognize the varied nature of infill development in relation to the geometry, size and context of certain sites. It is our opinion that these matters are more appropriately addressed through a zoning by-law application. We recommend that the guideline be modified to provide direction insofar as principles and suggest that they not set out prescribed or specific metrics.

Implementation

In order to ensure fairness and clarity regarding the interpretation of any guidelines, we recommend the introduction of transition clauses within the Guidelines and any future Official Plan

Amendments, should they proceed to Council for approval. This would provide clarity in relation to the applicable guidelines and policies for applications that were submitted under the existing policy framework.

We appreciate the Committee's consideration of the above comments and we request to continue to be provided with any further notice of any meetings, reports or draft policies in relation to this matter. Should you have any questions, please contact the undersigned at (ext. 241) or Julia Pierdon (ext. 307).

Yours truly,

Weston Consulting

Per:



For:

Ryan Guetter, BES, MCIP, RPP
Vice President

- c. John MacKenzie, City of Vaughan
Aaron Platt, Davies Howe
Clients