

September 6<sup>th</sup>, 2016

**Mayor Maurizio Bevilacqua and Members of Council**  
Vaughan City Hall  
2141 Major Mackenzie Drive  
Vaughan, ON  
L6A 1T1

MGP File: 14-2314

Via email to City Clerks [Clerks@vaughan.ca](mailto:Clerks@vaughan.ca)

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Communication
CW: <u>Sept 7/16</u>
Item: <u>19</u>

Dear Mayor Bevilacqua and Members of Council,

**RE: Development Services Committee – September 6<sup>th</sup>, 2016**

**Agenda Item #19: Co-ordinated Land Use Planning Review: Response to Proposed Changes  
The Growth Plan, Greenbelt Plan and Oak Ridges Moraine Conservation Plan, (File #16.30)  
Block 41, City of Vaughan**

Malone Given Parsons Ltd. is the land use planning consultant for the Block 41 Landowners Group. Block 41 is one of two New Community Areas identified in the City of Vaughan's Official Plan 2010, which are to accommodate growth up to the 2031 planning horizon. These lands are currently the subject of a City-lead study and planning process to support preparation and approval of Secondary Plans that will enable development for a range of urban uses.

**Greenbelt Boundary & Site Specific Technical Adjustments:**

We support the staff recommendation h. **"that technical mapping corrections, including those related to site specific requests, be made prior to finalizing the plan amendments and schedules."** Further, we request that the City of Vaughan obtain clarity from the Ministry of Municipal Affairs (MMA) regarding the Greenbelt Plan boundary refinement process.

We are very concerned with the status of the Ministry's review of site specific requests for modifications to the Greenbelt boundary. We understand from the MMA website page entitled **"Response to Site Specific Requests"** that the Ministry is *"...obtaining detailed technical information from municipalities, conservation authorities and landowners to determine if further refinements are required to achieve the natural heritage protection objectives of the Greenbelt. This will also help [MMA] determine impacts on specific properties. If any minor changes are considered necessary, the province will consult again."*

Currently it is very unclear if there is in fact a formal process to review the Greenbelt boundaries and if so, what that process is. As this is the 10-year review of the Greenbelt Plan, there must be an open and transparent process put in place to review boundaries and make refinements to reflect prior inaccuracies or lack of detailed environmental analysis and ground truthing.

Much of the Block 41 Lands are located within the Greenbelt Boundary, some of which do not comprise natural heritage features and warrant removal from the Greenbelt Plan. There must be a process to permit such refinements and correct past errors.

Our clients have requested to meet with MMA staff to provide the detailed technical information supporting their site specific requests, as per the direction on the provincial website. However, staff at the Ministry has responded that: *"At this point we are not making any appointments to meet with developers or land owners about the boundary."*

The Ministry has not provided any further details about the process, nor has there been any timeframe indicated as to when the above-referenced *"detailed technical information will be obtained from municipalities, conservation authorities and landowners to determine if further refinements are required."*

As such, we are requesting that the City include in its recommendations to the Province the following:

- **Clarification on what open and transparent process is being established to review Greenbelt boundaries;**
- **Clarification on the criteria for boundary refinements;**
- **Outline a clear timeframe as to when this process will be established and open for submissions; and, further;**
- **Permit the precise limit of the Greenbelt boundary in the City of Vaughan's New Community Areas to be established through the Secondary Plans that will be completed for these areas.**

We suggest that the City advise the Province that an appropriate process for the Block 41 Lands is to rely on and implement the findings of the scientific studies completed through the City's Secondary Plan process. These studies determine environmental feature boundaries, buffers, and the resulting development limits and incorporate full participation by agencies including the City of Vaughan, the Regional Municipality of York, the Toronto and Region Conservation Authority, the Ministry of Natural Resources and Forestry, etc.

We request that the City ask the Ministry to permit the Greenbelt boundary in the Block 41 to be refined through and consistent with the Secondary Plan studies. This can be done by either:

- **a Greenbelt Plan policy permitting the Greenbelt boundary to be refined on approval of the Secondary Plans, or**
- **a Greenbelt Plan policy permitting development between the Greenbelt boundary and the development limit established through approval of the Secondary Plans.**

The attached graphic illustrates an area highlighted in yellow, being the approximate area between the environmental feature boundaries (before any feature buffers), and demonstrates the inconsistent variability of the Greenbelt boundary line in the Greenbelt Plan.

### **Recreational Uses in the Greenbelt:**

The proposed Greenbelt Plan recognizes that a system of parklands, open spaces and trails across the Greenbelt is necessary to provide opportunities for recreation, tourism and appreciation of cultural heritage and natural heritage. It also states that they serve as an important component of Complete Communities and provide important benefits to support environmental protection, improved air quality and climate change mitigation.

Given that there are significant Greenbelt lands in Block 41 that will be surrounded by urban uses and that do not have any environmental features, we are requesting that the City include in its recommendations to the Province the following:

- **That additional recreational and parkland uses be permitted within the Greenbelt Plan area as parkland dedication for the development of lands outside of the Greenbelt.**

As noted within the Greenbelt Plan, recreational and parkland uses are necessary to support complete communities and can complement natural areas by enlarging their footprints and by offering public access and visual windows into otherwise private Greenbelt Plan areas.

### **Proposed Growth Plan – Density & Intensification:**

Currently, the minimum density of 70 people and jobs per ha is not practical for Block 41, because transit opportunities will be limited and the public use requirements of the City and School Boards will force the unit mix to be dominated by townhouses, stacked townhouses and apartments to achieve that minimum of 70 people and jobs per ha.

We do not believe Block 41 can achieve the 70 people and jobs per ha mandated by York Region and have requested that the density minimums not be applied in all blocks at the same level. We believe that greater flexibility is needed when a situation like Block 41 arises. If the density of 80 persons and jobs per ha becomes the new standard, the mix would be dominated by stacked townhouses and apartments. City staff have raised this an issue and we agree that it is unrealistic to expect that level of density for a Greenfield location on the edge of the City where transit will be limited. We are requesting that the City include in its recommendations 1.c to the Province the following:

- **That the City explicitly and strongly indicate to the Ministry that it does not support the proposed Growth Plan's new target densities of 80 people and job per ha for Designated Greenfield Areas and the proposed Growth Plan's 60% intensification target.**

Further, we support the City's transition recommendation 1.d, in that if there are new densities in the new Growth Plan, it is fair and appropriate that all lands that are currently within "urban" and "future urban" designations be transitioned to permit development to occur in a manner that is consistent with current policies of the Growth Plan.

Lastly, we have attached a memorandum previously submitted to both the Region of York and City of Vaughan regarding the Block 41 Lands, outlining in greater detail our comments as it relates to

TO: Mayor Bevilacqua and Members of Council

September 6<sup>th</sup>, 2016

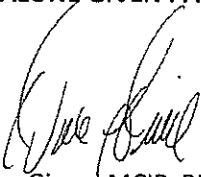
RE: Agenda Item #19: *Co-ordinated Land Use Planning Review*

Recommendation 73 of the Advisory Panel Report on the on the *Co-ordinated Review of the Provincial Growth Plan, Oak Ridges Moraine Conservation Plan, Greenbelt Plan and Niagara Escarpment Plan*.

If you would like to discuss any aspect of this letter or if you have any further questions regarding this submission, please contact me at 905.513.0170 ext. 109.

Yours very truly,

**MALONE GIVEN PARSONS LTD.**



Don Given, MCIP, RPP

President

[dgiven@mgp.ca](mailto:dgiven@mgp.ca)

cc.

Daniel Kostopoulos, City Manager, City of Vaughan

John Mackenzie, Deputy City Manager, Planning and Growth Management, City of Vaughan

Roy McQuillin, Acting Director of Policy Planning, City of Vaughan

Valerie Shuttleworth, Director of Long Range Planning, Regional Municipality of York

Block 41 Landowners Group

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## MEMORANDUM

TO: Region of York and the City of Vaughan

FROM: Malone Given Parsons Ltd.

DATE: March 2, 2016

MGP FILE: 14-2314

SUBJECT: Recommendation 73 – Recommendations of the Advisory Panel  
Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe:  
2015-2041  
Block 41 – City of Vaughan

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On December 7, 2015 the *Advisory Panel on the Coordinated Review of the Growth Plan, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan* released a report entitled **"Planning for Health, Prosperity and Growth in the Greater Golden Horseshoe: 2015-2041"**, providing a wide-ranging set of 87 recommendations intended to inform this coordinated review.

"Recommendation 73" of the report deals specifically with boundary concerns within the existing Plans including the Greenbelt Plan. According to the recommendation, boundary concerns should be addressed through policy changes by working with upper- and single-tier municipalities as they undergo official plan conformity, and by Provincial approval authority for official plan conformity amendments.

Block 41 is one of two New Community Areas identified in the City of Vaughan's *Official Plan 2010* which are to accommodate growth up to the 2031 planning horizon. As per the attached schedule, it is our opinion that the lands identified in yellow, totalling 78 hectares, should be removed from the *Greenbelt Plan* area reflecting the result of the natural heritage and science based studies currently underway. Making use of lands efficiently is consistent with the policies of the various provincial plans as well as regional and local official plans and policy documents relating to complete communities.

Requests for any adjustments to the Greenbelt Plan boundary must consider the recommendations of the Advisory Panel as they relate to each of these policy concerns. Block 41 meets the recommendation criteria, where applicable, as per the following:

### Settlement Area Expansion

- The Growth Plan establishes a process for Settlement Area Expansion, the decision of which must meet certain criteria. Block 41 is one of two New Community Areas identified in the City of Vaughan's Official Plan 2010 intended to accommodate growth up to the 2031 planning horizon.
- As part of the City of Vaughan's Secondary Plan process for Block 41, a Master Environmental Servicing Plan (MESP) will use science to define a more accurate "Limit of Development", resulting in refinements to the Greenbelt Plan boundary and constituting a minor boundary expansion of the Settlement Area.
- Settlement Area Expansions are subject to York Region's Municipal Comprehensive Review (MCR) process and supported by the City of Vaughan. Expansion may occur on lands that meet the following criteria:
  - Lands must not be restricted by availability of servicing;
  - Lands must not comprise a Specialty Crop Area;
  - Lands must not be Natural Heritage System lands;
  - Lands must not be located in the Moraine Natural Core and Linkage Areas;
  - Expansion must occur on lands experiencing growth pressures and/or with locations appropriate for growth;
  - Lands must have existing or planned infrastructure to support and accommodate significant growth.
- Block 41 meets all Settlement Area Expansion criteria itemized above.

### Complete Communities

- • The City of Vaughan's Official Plan 2010, as adopted by Council on September 7, 2010 and endorsed with modifications by the Region of York on June 28, 2012 and partially approved by the Ontario Municipal Board, includes "complete community" policies.
- Boundary adjustments resulting in additional tableland will strengthen the opportunity to create a new community that better integrates and supports transportation planning, complete streets, built form and urban design best practices.

### Strategic Employment Lands

- • This criterion is not applicable to Block 41. Strategic Employment Lands are located directly east of Block 41 on both sides of Highway 400. As such, no boundary expansion is required in Block 41 to facilitate Strategic Employment Lands.

### Infrastructure and Servicing

- Infrastructure and servicing has been planned and built into the Development Charges Background Study in anticipation of the future planned development.

- Adjustments to the Greenbelt boundary will further encourage compact and efficient growth pattern, and support existing planned infrastructure and servicing for Block 41.

#### Agricultural Viability / Protection of Farmland

- Block 41 is currently designated for growth and development by both the City of Vaughan and the Region of York official plans. The development of Block 41 will result in fragmented agricultural parcels within the Greenbelt whose viability for long-term agricultural purposes will be severely constrained. As such, these parcels should be removed from the Greenbelt to permit more efficient and compact development that utilizes planned infrastructure.
- The Greenbelt boundary should be based on an evidenced based approach that utilizes science based evidence to delineate the boundary.

#### Natural Heritage Systems

- At present, the boundary is not science-based and includes tableland within the Greenbelt Plan area, not encumbered by a natural heritage feature, effectively sterilizing the land from development by virtue of their inclusion in the Greenbelt Plan area.
- Block 41 is subject to several in-depth studies as part of the Conceptual Master Plan process including comprehensive Subwatershed Studies (SWS) for all watercourses within and adjacent to the New Community Areas.
- This information will be further studied as part of the Master Environmental Servicing Plan (MESP), using science to build on the environmental context of natural features and functions in systems-based approach, thereby defining a more accurate limit of development.
- Small fragmented parcels of lands left vacant and unused, and surrounded by urban uses which are too small to be economically viable agricultural parcels, serves no environmentally significant purpose.

#### Water Resources

- Currently underway and as noted above, water resources for Block 41 will be planned to manage surface and ground water at the highest and best practices level.

#### Climate Change

- York Region and the City of Vaughan official plans include policies that support complete communities, land use planning, transportation planning and energy planning for Block 41.
- Adjustments to the boundary will further encourage compact and efficient growth patterns, and support the planning framework currently in place for Block 41.

#### Enhancing Plan Implementation

- Both York Region and the City of Vaughan require completion of a rigorous and comprehensive Secondary Plan process before any development can be approved in Block 41, including science-

based studies such as the MESP and SWS.

- Land within the City of Vaughan's New Community Areas should be used to the greatest extent possible to make efficient use of land, a key Growth Plan objective as it reduces the need for outward expansion of urban areas.
- Given the authority, we are confident that the Region and the City of Vaughan would consider adjustments to the Greenbelt where appropriate, to fulfill the various objectives of all Provincial Plans, as implemented through Official Plan Amendments.

### Conclusion



Based on Advisory Panel's recommendations and the detailed science-based studies currently underway for Block 41, it is our opinion that a minor refinement to the Greenbelt Plan boundary on these lands is consistent with the recommended directives as stated in the Report.



# PROVINCIAL PLANNING REVIEW, 2015-2016

Block 41 Landowner's Group  
City of Vaughan

## Legend

-  Block 41 Lands
-  Greenbelt Boundary

Lands proposed to be removed from the  
Greenbelt - 78.0 ha.



Date: May 8, 2015  
Prepared by:

 MALONE GIVEN PARSONS LTD.