



64 Jardin Drive, Unit 1B
Concord, Ontario
L4K 3P3
T. 905.669.4055
F. 905.669.0097
klmplanning.com

P-1736

April 3, 2017

By E-mail and Mail to: Barbara.McEwan@vaughan.ca



City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Attention: Mayor and Members of Council

Re: Community Area Policy Review for Low-Rise Residential Designations
Amendments to the Vaughan Official Plan 2010
Committee of the Whole – April 4, 2017
City File #15.120.1
On behalf of 9733 Keele Development Inc.
9773 Keele Street
City of Vaughan

Dear Mayor and Members of Council,

KLM Planning Partners Inc. is the land use planning consultant for 9773 Keele Development Inc., the owner of the above referenced lands. This letter is in response to our review of the Planning Department staff recommendation report to Vaughan Committee of the Whole on April 4, 2017 respecting amendments to VOP 2010 (Community Area Policy Review for Low-Rise Residential Designations), and further to our correspondence dated November 1, 2016 (attached) in response to the Public Hearing regarding the same subject matter.

After reviewing the report, we have concluded that our concerns which were previously identified have not been addressed to our satisfaction. We acknowledge and appreciate the position of staff that *“all development applications submitted in the Low-Rise Residential Areas in the Established Community Areas prior to the approval of the amendments to the Official Plan resulting from this process will be reviewed on the basis of the policies that were in effect of the time the applications were submitted”*. It would be appreciated if staff and Council could extend this position to future development applications intended to implement the development after Council approval including site plan, draft plan of condominium and minor variance applications, where applicable.

Additionally, we continue to have concern with the proposed policy 9.1.2.4 for Established Community Areas which requires that all new dwellings shall front and address a public street, and that private laneways or driveways shall not be used to provide frontage for residential dwellings.

There are several good examples of appropriate and compatible developments within the City of Vaughan and specifically within established areas where development is provided access via a private common element or condominium road.

In fact, under Section 6 g) (Urban Design Guidelines) in the main body of the planning report, staff acknowledge concerns raised through the consultation process with respect to the guidelines not appropriately addressing deep and narrow infill sites, particularly those on arterial roads. In response to these concerns, on October 19, 2016, Council approved the Urban Design Guidelines for Infill Development in Established Low-Rise Residential Neighbourhoods subject to the following (in part):

*1. That staff be directed to finalize the guidelines with the requirement that conceptual designs be prepared, with stakeholder input, to investigate opportunities to **incorporate private driveway or laneway internal circulation systems to accommodate development in deeper parcels fronting onto arterial roads**, within the Low-Rise Residential Area;*

The direction provided by Council to consider opportunities to provide private driveways or laneways to accommodate development on deeper parcels fronting onto arterial roads has not been appropriately considered and addressed.

Finally, the delineation between "Community Areas" and "Established Community Areas" is not clear. Even with the new definition added to the end of Policy 9.1.2.1 it is difficult to understand and interpret the specific Official Plan policies applicable to each of these respective areas.

We kindly request that we be notified of any future reports and/or public meetings and open houses regarding this Study and ask that we receive any notice of the Committee of the Whole or Council in this matter. We reserve the right to provide additional comments on the proposed matter related to the subject lands as it evolves.

Thank you for the opportunity to comment and we look forward to participating further in the review. If you have any questions, please contact the undersigned.

Yours very truly,

KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan, MCIP, RPP
Partner

Copy John Mackenzie, Deputy City Manager, Planning and Growth Management
 Roy McQuillin, Director of Policy Planning and Environmental Sustainability
 Melissa Rossi, Manager, Policy Planning
 Kyle Fearon, Planner 1, Policy Planning
 9773 Keele Development Inc.



64 Jardin Drive, Unit 1B
Concord, Ontario
L4K 3P3
T. 905.669.4055
F. 905.669.0097
klmplanning.com

P – 1736

November 1st, 2016

By E-mail only: Jeffrey.abrams@vaughan.ca

City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Attention: Mayor and Members of Council

**Re: Community Area Policy Review of Low-Rise Residential Designations
Amendments to the Vaughan Official Plan 2010
Committee of the Whole (Public Hearing) – November 1, 2016
City File #15.120.1
On behalf of 9733 Keele Development Inc.
9773 Keele Road
Part of Lot 19, Concession 3
City of Vaughan**

Dear Mayor and Members of Council,

KLM Planning Partners Inc. is the land use planning consultant for 9773 Keele Development Inc. ("Client"), the owner of 9773 Keele Street in the City of Vaughan. The subject lands are located on the east side of Keele Street across the street from Merino Road and south of Barhill Road. The subject lands are designated "Low-Rise Residential" as per Schedule 13 (Land Use) in the Vaughan Official Plan 2010 ("Vaughan 2010 OP"). Further, Keele Street is identified as a "Major Arterial Road on Schedule 9 (Future Transportation Network) and a "Regional Transit Priority Network" on Schedule 10 (Major Transit Network) in the Vaughan 2010 OP.

On behalf of our client, we have reviewed the proposed amendments to the City of Vaughan Official Plan 2010 relating to the Community Area Policy Review for Low-Rise Designations and we are not supportive of the proposed changes. We are of the opinion that the proposed amendments and modifications are too restrictive and that development applications would be better judged by their own merits through the development review process.

The Vaughan Official Plan is intended to address long-term planning direction of a municipality, and is required to be in conformity with Provincial and Regional land use policy. More specifically, the Provincial Policy Statement (PPS) requires that municipal Official Plans be consistent with its

policies relating to the wise use of land in the Province. This includes, but is not limited to supporting intensification and more transit-supportive land use patterns and providing an appropriate range of housing types and densities, which are required in order to encourage the creation of more compact, diverse and complete communities.

Our client had a pre-consultation meeting with City staff with regards to redevelopment of the subject lands for eleven (11) townhouse units and the retention of a heritage home on a common element road. We are currently in the process of preparing the applications to support the proposed development. It is our opinion, that the proposed development on the subject lands would contribute to the City in meeting their intensification goals and objectives as well as providing transit supportive form of development. Further, the proposed development represents an efficient use of land and services and provides an appropriate transition from the arterial road to the surrounding neighbourhood.

Our client is especially concerned with the proposed new Policy 9.1.2.4 which effectively prohibits townhouses within the Low-Rise Residential designation except those fronting an arterial road. The proposed new Policy 9.1.2.4 recognizes that limited intensification in the form of townhouses may be permitted along arterial roads, however, it contains prescriptive policies to permit a form of development that is more characteristic of the surrounding area and not the character of the Arterial Road it is situated on. In our opinion, the proposed policies would lend itself to an inefficient use of land. These prescriptive policies require dwellings to front a public street and prohibit residential units from having frontage onto a private laneway or driveway (i.e. common element roads) as well as specific setback requirements. As such, the development as proposed for the subject lands would not be permitted if these policy amendments are approved.

Further, the Policy Review carried out by Urban Strategies Inc. acknowledges that the development pattern along Arterial Roads in the Community Area is inconsistent with the surrounding neighbourhoods on either side of the Arterial Road. However, the proposed amendments to the Vaughan 2010 OP will limit opportunities for appropriate intensification along arterials by restricting the form of development that is characteristic of the surrounding area. It is our opinion, that the proposed amendments go against the intensification objectives that encourage a more efficient use of land, services and public transit.

A balance can be struck through the development process to provide both an appropriate form of intensification along arterials that is respectful and compatible with the surrounding Community Area. The proposed amendments interfere with the planning process and impose restrictive standards that promote a development form that is not conducive to support the intensification objectives of the Official Plan.

In addition, it is our opinion that the subject lands being situated on Keele Street represent an appropriate form of intensification that is both respectful and compatible with the surrounding neighbourhood, and that appropriate site layout, built-form, massing and setbacks will be reviewed by staff through the required development application process.

The proposed development concept is of a similar nature to other development applications along Keele Street. Given the depth of the subject lands, the proposed amendments would provide for development that is an inefficient use of the subject lands.

We kindly request that we be notified of any future reports and/or public meetings and open houses regarding this Study and ask that we receive any notice of the Committee of the Whole or Council in this matter. We reserve the right to provide additional comments on the proposed matter related to the subject lands as it evolves.

Thank you for the opportunity to comment and we look forward to participating further in the review. If you have any questions, please contact the undersigned.

Yours very truly,

KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan, BURPI, MCIP, RPP
Associate / Senior Planner

Copy John Mackenzie, Deputy City Manager, Planning and Growth Management
Roy McQuillin, Director of Policy Planning and Environmental Sustainability
Melissa Rossi, Manager, Policy Planning
Kyle Fearon, Planner 1, Policy Planning
Carol Birch, Development Planning
9773 Keele Development Inc.