



BOUSFIELDS INC.

**PUBLIC HEARING
COMMUNICATION**

C3

Date: Mar 6/18 ITEM NO. 1

Project No. 0966

March 2, 2018

Office of the City Clerk
Vaughan City Hall, Level 100
2141 Major Mackenzie Drive
Vaughan, ON L6A 1T1

Dear Sir or Madam:

**Re: Committee of the Whole – March 6, 2018
New Community Area Block 27 Secondary Plan Study (File # 26.4.1)
Block 27 Landowner's Group Comments**

We are planning consultants for the Block 27 Land Owners Group Inc. ("LOG"). A complete list of the LOG member companies/ownership entities is attached as Schedule A to this letter.

As the draft Block 27 Secondary Plan will be presented at the Committee of the Whole meeting on March 6, 2018, we have reviewed the draft Secondary Plan and associated schedules and formally provide the attached commenting matrix and proposed schedule revisions on behalf of the LOG and the specific landowner companies/ownership entities referenced on Schedule A.

In general, the LOG is supportive of the strategic growth priorities and policies found in the Draft Secondary Plan. The LOG has and will continue to work with staff and other external agencies to ensure that its interests are met in the Secondary Plan.

By way of this letter and our submission hereto, the LOG and the specific landowner companies/ownership entities referenced on Schedule A, ask that you advise us of any further meetings, reports, decisions, etc. related to this matter.

Respectfully Submitted,

Bousfields Inc.

David Falletta, MCIP, RPP

Emma West, MCIP, RPP

cc: Armine Hassakourians, Senior Planner, City of Vaughan
Block 27 Land Owners Group



SCHEDULE "A"

BLOCK 27 LANDOWNER GROUP MEMBERS

Lormel Developments Ltd. (Lormel Homes Ltd.)

Di Poce Consulting Inc. (Di Poce Management Limited)

Keltree Developments Inc.

West Jane Developments Inc. (DG Group)

Gusgo Holdings Ltd. (Nideva Properties Inc.)

Erica La Posta, Peter La Posta, Stephen Di Biase, Adrian Di Biase, Eliana Di Biase

Rosehollow Estates Inc. (Gold Park Group)

Vincenza Petricca

Heathfield Construction Ltd. (Armland Group)

Keele Street Properties Limited

Estate of Giuseppe Battistella, Palmira Battistella

Ferrara Glade Investments Inc. (Armland Group)

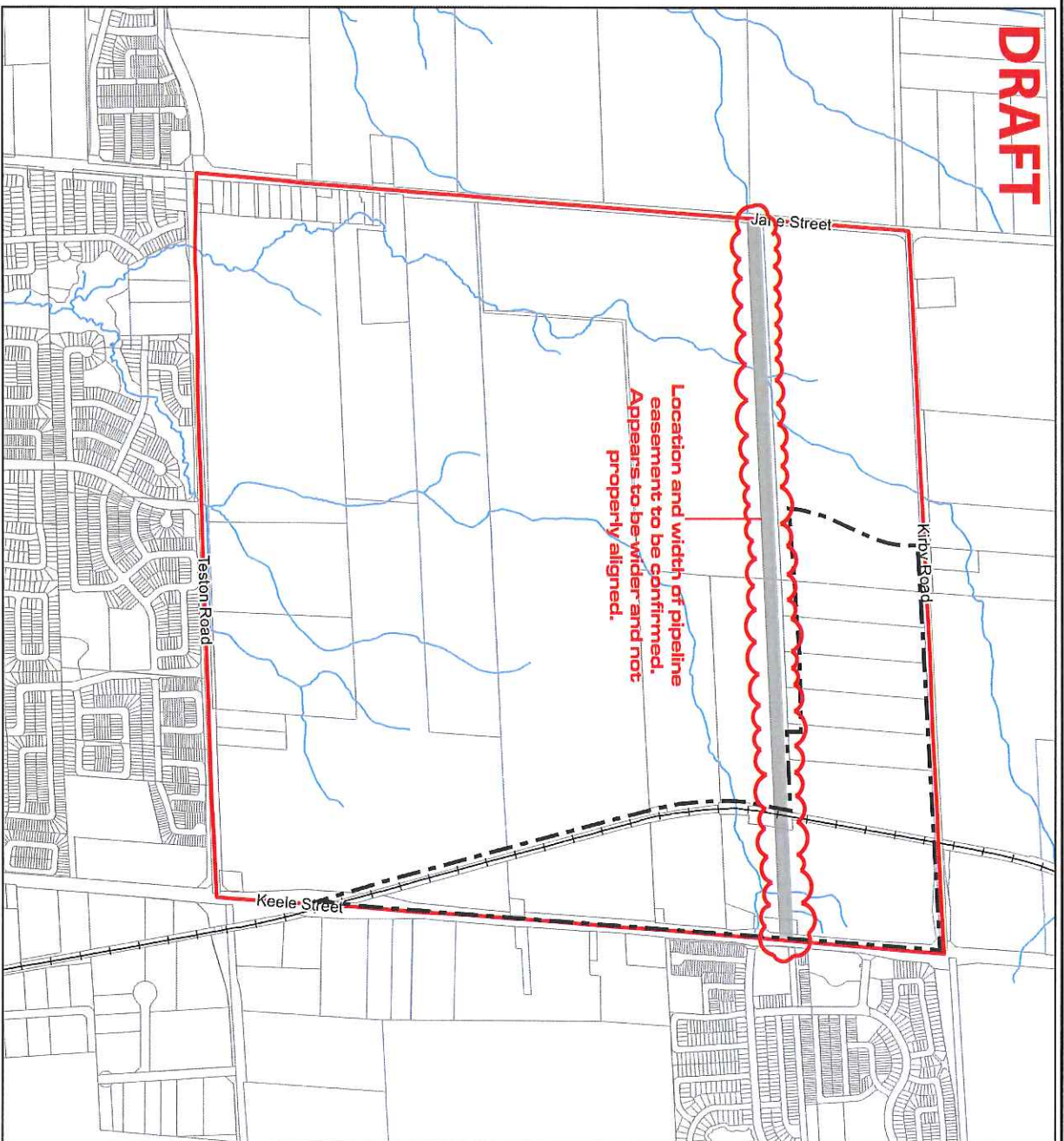
Bayview-Wellington Properties Inc. (ARG Group Inc.)

Gold Park (Maple) Inc. (Gold Park Group)

Teston Woods Development Corporation (State Building Group)

Alderlane Estates Inc. (Royal Pine Homes)

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SCHEDULE A

BLOCK 27

SECONDARY PLAN AREA

Legend

- Secondary Plan Area
- Local Centre - Kirby GO Transit Hub
- Infrastructure and Utilities
- Railway Line
- Stream



Revised January 2, 2018

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Shift Collector Road North to allow E/W collector and pipeline

Remove all Minor Collector Roads

Shift SWM Pond

Remove Wetland

Location and width of pipeline easement to be confirmed. Appears to be wider and not properly aligned.

Remove Wetland Add Mid-Rise Residential

Add Low-Rise Mixed-Use

Expand Natural Areas Special Study Area 1

Only those identified Potential SWM Facilities are to be identified on the plan

Remove Max. Height reference

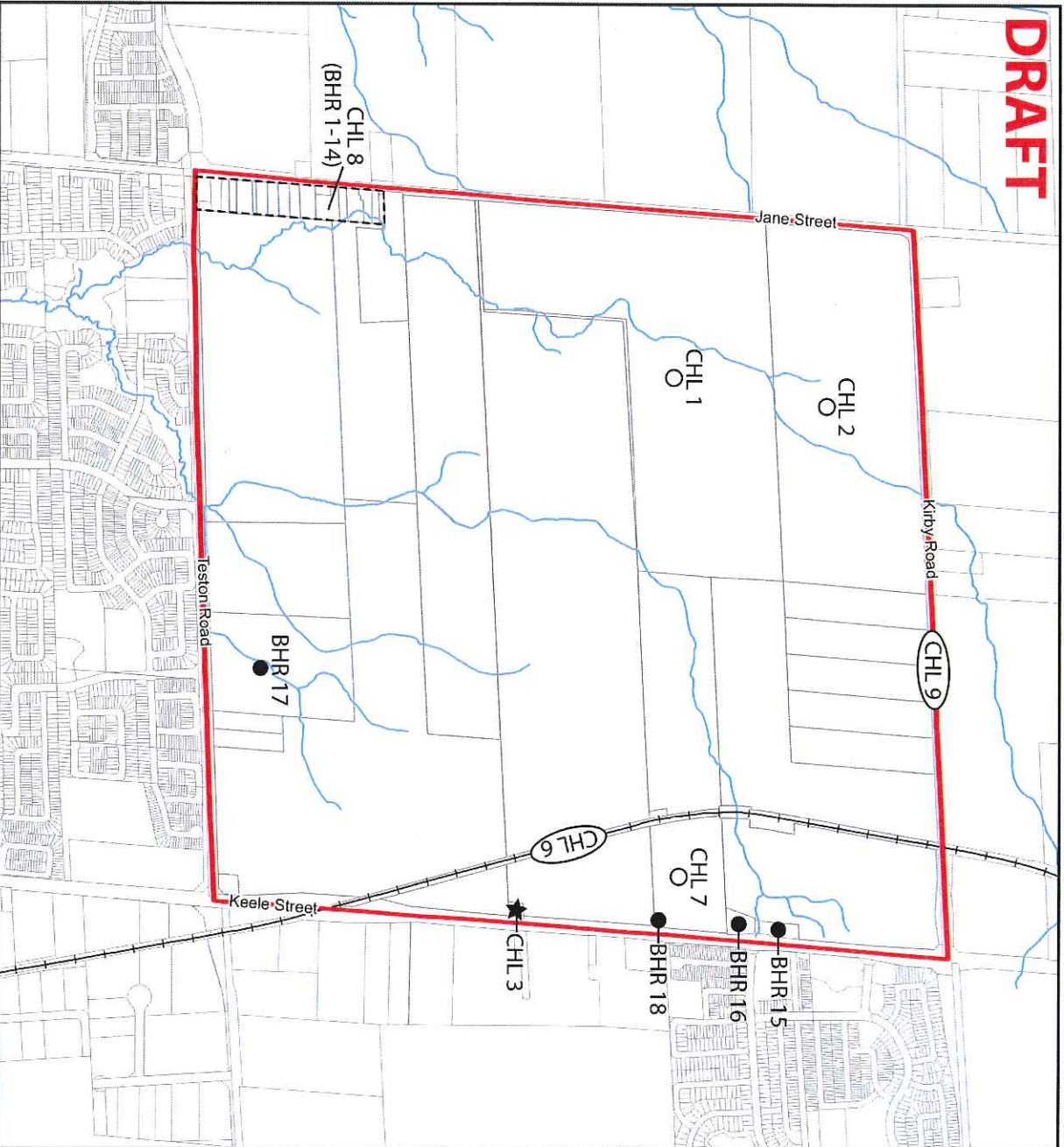
SCHEDULE B BLOCK 27 LAND USE PLAN

Legend

- Secondary Plan Area
- Local Centre - Kirby GO
- Transit Hub
- Transit Hub Special Study Area
- Low-Rise Residential
- Low-Rise Mixed-Use
- Mid-Rise Residential
- Mid-Rise Mixed-Use
- Community Hub
- Transit Hub
- Neighbourhood Park
- Public Square
- Elementary School
- Secondary School
- Private Open Space
- Infrastructure and Utilities
- Potential SWM Facility
- Natural Areas
- Natural Areas - Evaluated
- Wetlands
- Greenbelt Plan Area
- Railway Line
- Stream
- Engineered Floodline
- Natural Area Special Study Area
- Maximum Height
- Maximum Density

0 125 250 500
Meters
Revised January 25 2018

DRAFT

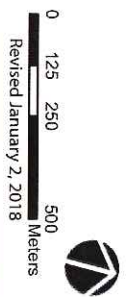


SCHEDULE C

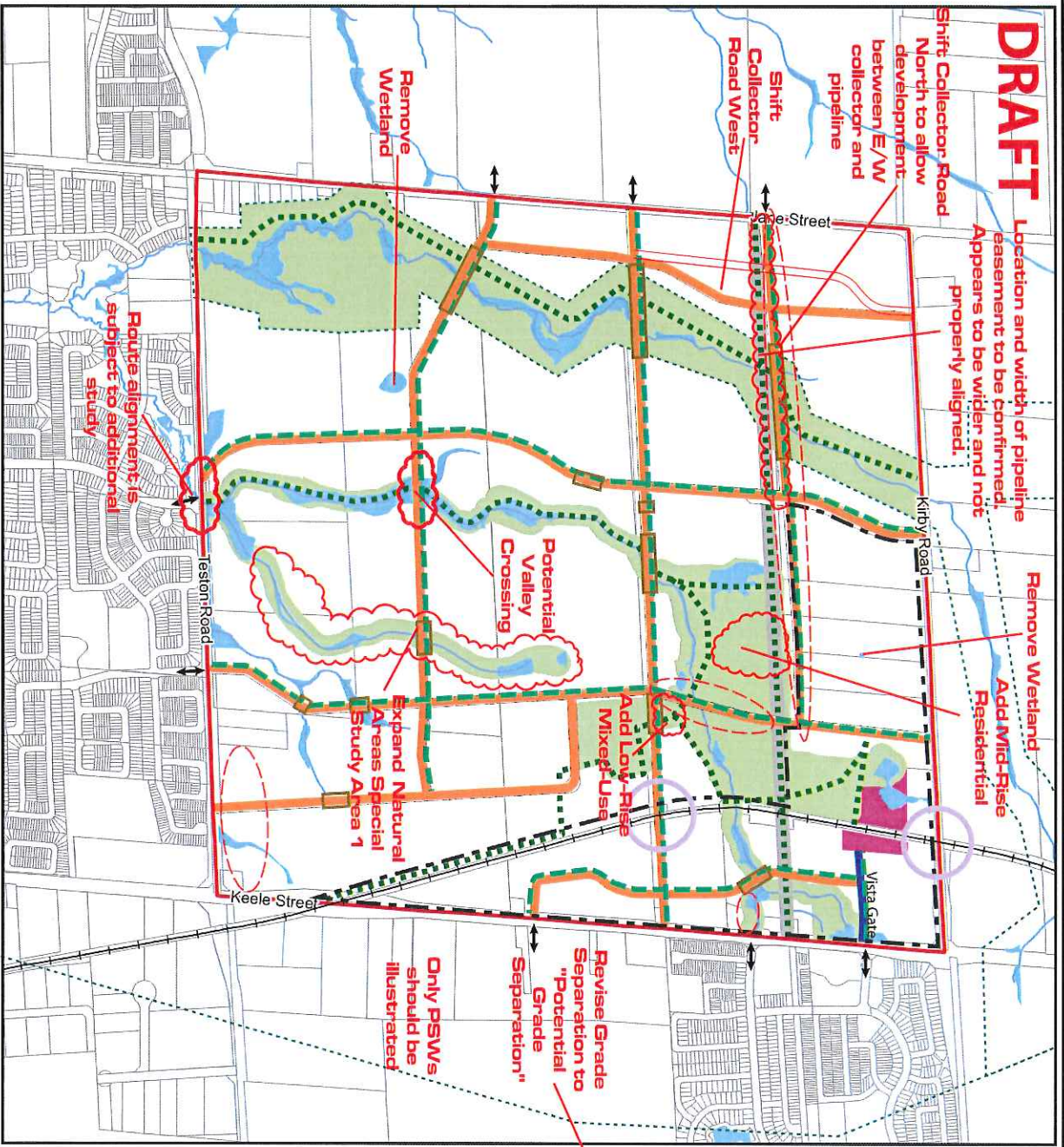
BLOCK 27

BUILT HERITAGE AND CULTURAL HERITAGE LANDSCAPES

- Legend**
- Secondary Plan Area
 - Built Heritage Resource
 - Cultural Heritage Landscape
 - Cemetery (CHL 3)
 - Hamlet of Teston
 - Railway Line
 - Stream
 - Remove all Streams



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SCHEDULE D BLOCK 27 MULTI-MODAL TRANSPORTATION NETWORK

Legend

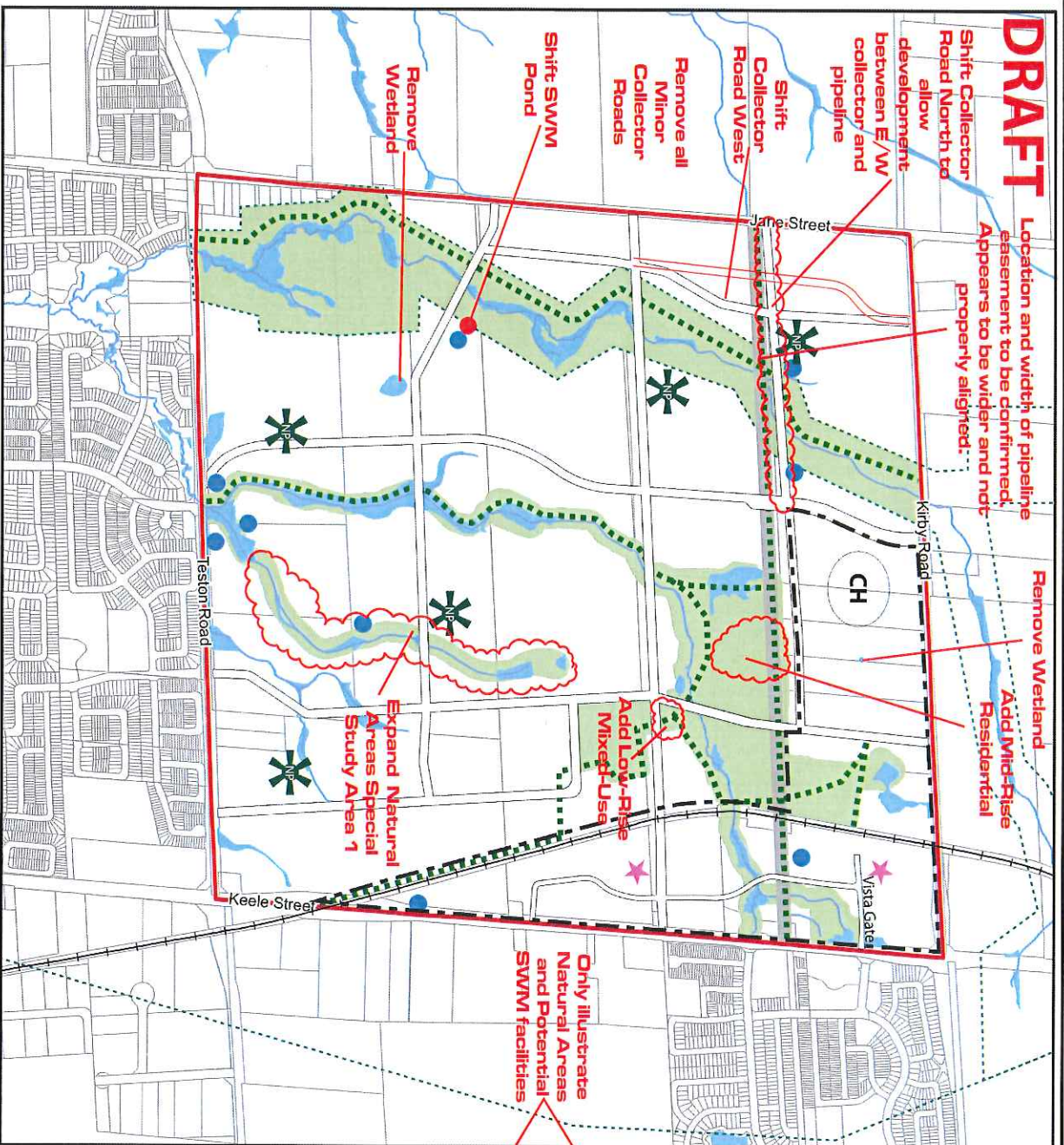
- Secondary Plan Area
- Local Centre - Kirby GO
- Transit Hub
- Arterial Road
- Collector Road
- Main Street
- External Connections
- Grade Separation
- Route/Alignment Subject to Further Study Refer to Policy 4.1.1c and d
- Transit Hub
- Dedicated On-Street Cycling/ In-Boulevard Facility
- Multi-Use Recreational Path
- Natural Areas
- Natural Areas - Evaluated
- Wetlands
- Greenbelt Plan Area
- Infrastructure and Utilities
- Railway Line
- Stream
- Potential Valley Crossing

Note: 1. Main Street functions as a Collector Road
2. See NVNCTMP boards for description of roads

0 125 250 500 Meters

Revised January 25, 2018

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SCHEDULE E BLOCK 27 NATURAL HERITAGE NETWORK AND OPEN SPACE SYSTEM

Legend

- Secondary Plan Area
- Local Centre - Kirby GO Transit Hub
- Community Hub
- Neighbourhood Park
- Public Square
- Infrastructure and Utilities
- Potential SWM Facility
- Multi-Use Path
- Natural Areas
- Natural Areas - Evaluated
- Greenbelt Plan Area
- Railway Line
- Stream

Note: Location and number of potential SWM to be finalized through the Block Plan/ESP process

0 125 250 500
Meters
Revised January 24, 2018



Commenting Matrix

Draft Block 27 Secondary Plan (File #26.4.1)

Section # (Please reference Policy Number from Draft Plan)	Comment
Map Changes	<ul style="list-style-type: none"> • The scale of the plan is not accurate (note: we have provided our plan numerous times) • The alignment and width of the TransCanada pipeline corridor is inaccurate • The following modifications are requested and illustrated on the attached redline maps: <ul style="list-style-type: none"> ○ Remove wetland previously not identified in Schedule B found on the Teston Woods parcel ○ Add to Schedule D outline to ensure connection to Block 26 ○ Add Mid-rise Residential previously identified, south of the pipeline, currently being identified as Natural Areas in Schedule B ○ Add Low Rise Mixed Use previously identified, north of central e/w collector (between n/s collector and rail corrido), currently being identified as Natural Areas in Schedule B ○ Remove "Stream" identified in Schedules A-E found on the Bayview-Wellington lands ○ Expand Natural Area Special Study Area 1 south to the extent of the identified PSWR ○ Remove height from Schedule B ○ Remove Minor Collector Roads ○ Identify all potential valley crossings on Schedule D ○ Shift the SWM pond on Schedules B and E ○ The northern most east-west corridor should be offset from the pipeline corridor in order to allow for development in between the street and the pipeline ○ Shift North/South Collector on west side of Plan westerly (southerly from the non-participant) <p>(SEE ATTACHED REDLINE SCHEDULES)</p>

Section 2.1	<p>The DRAFT Secondary Plan provides a policy framework for tall buildings via Section 37 bonussing (see policy 2.2 b. vi.). Accordingly, we request that Section 2.1 b.i. and 2.2 a. be revised as follows:</p> <p><i>"b. Development Principles</i></p> <p><i>i. A distinct community character will be encouraged through the use of low-rise to mid-rise building form and scale, as well as tall buildings at appropriate locations.</i></p> <p><i>Block 27 will be a complete community that prioritizes people, sustainability and livability with a high quality of urban design. The community will feature a range of low to mid-rise buildings, as well as tall buildings at appropriate locations, that blend a variety of residential, retail and institutional uses..."</i></p>
Policy 2.2 b. i.	<p>We request that Policy 2.2 b. vii. be revised as follows:</p> <p>b. Development Principles</p> <p>vii. Design Excellence</p> <p>Design excellence has the power to inspire people and communities, building pride of place and improving quality of life. <i>Development</i> of all public and private buildings within Block 27, but particularly in the Local Centre - Kirby GO Transit Hub, shall strive for design excellence. Design excellence is driven by functionality and informed by beauty, alternative built form, durability, sustainability, accessibility, value, cost and economic viability.</p>
Policy 3.1.2 a	<p>We request that the wording in Policy 3.1.2 a. should be revised as follows:</p> <p><i>a. Through the policies of this Plan, the City shall seek to meet an overall density target of 70 people and jobs per hectare by 2031 for Block 27 and a target of 100 people and jobs for the Local Centre – Kirby GO Transit Hub, with a target of 150 people and jobs within 500 metres, an approximate 10 - minute walking distance, of the Kirby GO Transit Hub.</i></p>

<p>Section 3.2 (Low-Rise Residential)</p>	<p>Overall, we are supportive of the changes to the Low-Rise Residential policies with the following changes:</p> <p><i>"3.2.1 The Low-Rise Residential designation on Schedule B is planned to consist primarily of buildings in a low-rise form no greater than four storeys. Limited areas of four storeys may be permitted as identified through the Block Plan process. Generally, such areas shall be adjacent to lands in the Low-Rise Mixed-Use designation, along collector roads or the railway line. The lands in this designation will be developed as neighbourhoods focused around community facilities including schools and parks. The designation applies to the majority of the lands in Block 27 outside the Local Centre – Kirby GO Transit Hub.</i></p> <p><i>3.2.4 The Low-Rise Residential designation along the east-west collector road north of the TransCanada Pipeline (designated "Infrastructure and Utilities" on Schedule B) shall consist of a building typology and site design which limits and consolidates the number of driveway accesses to the built form, where feasible, in order to avoid negative impacts on traffic movement along the collector."</i></p>
<p>Section 3.3 (Low-Rise Mixed-Use)</p>	<p>We continue to have the following concerns:</p> <ul style="list-style-type: none"> ○ The maximum FSI for Low-Rise Mixed Use Areas should be 2.0 ○ Mid-Rise Buildings (up to 12-storeys (as per previous draft) not 6-storeys) with a maximum FSI of 4.0 should be permitted at the intersection of two arterials or arterials and collectors <p>We request that the wording in Section 3.3 be revised as follows:</p> <p><i>"3.3.3 The Low-Rise Mixed-Use designation permits all the building types under Policy 9.2.2.2 f. of the VOP 2010 including back-to-back townhouses and other similar building types, live-work units, the existing place of worship building and accessory buildings at 2430 Teston Road, and expansion or modifications to the existing buildings permitted by the zoning by-law. In addition, retail buildings may be permitted at the corner of collectors and arterials in accordance with the policies of Section 3.15.2 g. The maximum density in the Low-Rise Mixed-Use designation along</i></p>

	<p>arterial roads and the main east-west collector shall be a Floor Space Index ("FSI") of 2.0 and the maximum building height shall be five storeys. However, midrise buildings at the intersections of arterial and collector roads shall be permitted with a maximum FSI of 4.0 and a height of 12 storeys pursuant to the provisions of Section 9.2.3.4 b. to 9.2.3.4 d. of the VOP 2010. The minimum height in the Low-Rise Mixed-Use designation shall be two storeys or equivalent, excluding lands in the Hamlet of Teston as designated on Schedules B and C. In addition, low-rise buildings exceeding five storeys along arterial roads and the eastwest collector road, as well as low-rise buildings exceeding six storeys at the intersection of two arterials or arterials and collectors, may be permitted subject to the bonusing provisions of Policy 3.1.3 of this Plan, where appropriate.</p>
Section 3.4 (Mid-Rise Residential)	<p>We have the following concerns:</p> <ul style="list-style-type: none"> ○ The maximum FSI for Mid-Rise Areas should be 4.0 ○ The maximum building height should be 12-storeys with additional height via bonussing ○ The minimum building height of 3-storeys <p>We request that the wording in Section 3.3 be revised as follows:</p> <p><i>"3.4.1 The Mid-Rise Residential Use designation on Schedule B is located in the Local Centre – Kirby GO Transit Hub. Development in this designation is planned to consist primarily of Mid-Rise residential buildings. The development will be designed and developed at a density which is supportive of the Kirby GO Transit Hub. The proposed Community Hub will also be located in this area.</i></p> <p><i>3.4.2 The Mid-Rise Residential designation permits all the uses identified in Policy 9.2.2.3 b. of the VOP 2010.</i></p> <p><i>3.4.3 The Mid-Rise Residential designation permits all the building types identified in Policy 9.2.2.3 c. of the VOP 2010. The maximum density shall be 4.0 FSI and the maximum building height shall be twelve storeys. However, it also permits all the building types listed in Policy 9.2.2.3 d. The additional permitted building types include Townhouses, Stacked Townhouses and</i></p>

	<p><i>back-to-back Townhouses, other similar building types, live-work units, and Low-Rise Buildings. These additional building types shall only be permitted provided the minimum density target of 100 people and jobs per hectare can be achieved as required in Section 3.1.3.a. of this Plan, and demonstrated through the Block Plan process. In addition, midrise buildings exceeding twelve storeys may be permitted subject to the bonusing provisions of Policy 3.1.3 of the Plan, where appropriate."</i></p>
Section 3.4 (Mid-Rise Mixed Use)	<p>The proposed minimum building height is too restrictive and should be removed, as follows:</p> <p><i>"3.5.3 The Mid-Rise Mixed-Use designation permits all the building types identified in Policy 9.2.2.4 e. of the VOP 2010 with the exception of gas stations. In addition, retail buildings may be permitted in the southwest quadrant of Keele Street and Kirby Road north of Vista Gate in accordance with the policies of Section 3.15.2 g. The maximum density shall be 4.0 FSI. In addition, High-Rise Buildings may be permitted subject to Policy 9.2.3.6 of the VOP 2010. High-Rise Buildings which are planned to exceed 12 storeys may be permitted subject to the bonusing provisions of Policy 3.1.3 of this Plan, where appropriate."</i></p>
Policy 3.8.4	<p>The size of the public square should refer back to the parent VOP and, as such, we request that policy 3.8.4 be revised as follows:</p> <p><i>3.8.4 The Public Square designations on Schedules B and E are located conceptually in the Local Centre – Kirby GO Transit Hub. The Public Square located north of the TransCanada Pipeline (designated "Infrastructure and Utilities" on Schedule B) is intended to act as a focal point of the development in the Mid-Rise Mixed-Use designation. The Public Square located south of the TransCanada Pipeline (designated "Infrastructure and Utilities" on Schedule B) is intended to serve the local residential neighbourhood proposed in the area.</i></p>
Section 3.12.3 (Natural Area Special Study Area)	<p>The policy should not relate to the Net Environmental Outcomes as set out in Policy 6.3. The reference should be removed as follows:</p> <p>"3.12.3 Natural Area Special Study Areas</p>

	<p><i>The land use designations and street configurations, including the Natural Areas – Evaluated Wetlands designation, in the Natural Area Special Study Areas on Schedule B, Land Use Plan, reflect available information. Additional analysis will be carried out through the Block Plan process to better define key natural heritage features and key hydrologic features in the Natural Area Special Study Areas while ensuring a viable development pattern including a connected, continuous, grid-like street network designed to accommodate all modes of travel. If through the Block Plan process key natural heritage features and hydrologic features require modification and/or realignment and/or relocation of the features, the applicable policies of the adjacent land use designation shall apply. In such instances, an Official Plan amendment shall not be required in the Natural Area Special Study Areas provided the development reflects the results of the Block Plan.</i></p> <p>Delete 3.12.3 a) and b) in their entirety.</p>
Section 3.15 (Urban Design)	<p>We request the following revisions:</p> <p>“3.15.2 Local Centre – Kirby GO Transit Hub</p> <p>b. <i>Built Form</i></p> <p>xi. <i>All buildings along the “Main Street”, Keele Street and Kirby Road will be designed to maximize the pedestrian experience.</i></p> <p>d. <i>Parking and Service Facilities</i></p> <p>vii. <i>Service and loading facilities, including garbage storage, are to be incorporated in the main building wherever feasible. Where located in an accessory building or at grade they shall be located to the rear or side and screened by the main building or landscaping or other screening.</i></p>

	<p>g. <i>Retail Buildings</i></p> <p>i. <i>Retail buildings should be designed to address the public street with grade level units incorporating a high proportion of transparent glass that allows activity to be seen from the street or display windows. Buildings should have a minimum height of two storeys or equivalent, and a second storey is encouraged.</i></p> <p>3.15.3 Block 27 Neighbourhoods</p> <p>a. <i>Community Structure</i></p> <p>v. <i>Neighbourhood active transportation connections shall be provided and focused on the local and collector roads and, where necessary and appropriate, mid-block pathways and walkways should be incorporated into the design of block layouts to provide convenient active transportation access to adjacent neighbourhoods and community amenities.</i></p> <p>d. <i>Parking and Service Facilities</i></p> <p>ii. <i>Parking for low-rise residential buildings shall be designed such that driveways and garages do not dominate the front of the building. Garages shall, generally, not project beyond the front facade of the building or any front porch. In particular, where feasible development in the Low-Rise Residential designation along the east-west collector road north of the Trans-Canada Pipeline (designated "Infrastructure and Utilities" on Schedule B) shall consist of a building typology and site design that limits and consolidates the number of driveway accesses to the built form, in order to avoid negative impacts on traffic movement along the collector.</i></p> <p>e. <i>Public and Private Institutional Buildings</i></p> <p>v. <i>Places of worship shall be subject to the policies of Section 9.2.1.19 (error – this policy does not exist) of the VOP 2010."</i></p>
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**Section 4.0
(Transportation and
Mobility)**

We have identified the following concerns in Section 4.0:

- The alignment of the east-west collector north of the pipeline should allow lotting between it and the pipeline
- Feasibility of the proposed grade separations
- Ability to vary from the collector road system
- Restricting the development of the northwest quadrant of Keele Street and Teston Road until the completion of the IEA
- Requiring sidewalks for all streets (including ones that may potential bisect natural areas)
- Requiring on-street or in-boulevard cycling facilities on all collector roads

We request the following revisions:

“4.1.1 Street Network

b. Street Hierarchy

- ii. ***Adjustments** to the network on Schedule D will not require an amendment to this Plan provided the general intent and purpose of the Plan is maintained and the City is satisfied that the role and function of such streets are maintained. In areas, where streets cross or abut Natural Areas their design may be modified to minimize impacts on the Natural Areas including a reduced right-of-way width, replacement of sidewalks with a multi-use trail and use of a rural cross section.*
- v. *The final location, configuration, width and alignment of public streets shall be determined through the Block Plan, environmental assessment and development approval processes, subject to the recommendations of the NVNCTMP and traffic impact studies prepared by individual applicants. **Reduced right-of-way widths and partial street development shall be permitted to address development phasing.***

c. *Study Areas and Grade Separations*

Similarly, two **potential** grade separations of the street and the railway have been identified on Schedule D which will also require an environmental assessment process to assess the alternatives and confirm final design of the grade separation.

d. *Teston Road/Keele Street Study Area*

The Teston Road Individual Environmental Assessment ("IEA") is currently underway. The IEA is required to determine the alignment of Teston Road between Keele Street and Dufferin Street. As a result, the Region of York **may require** that all future development in **a defined area of the** northwest quadrant of Keele Street and Teston Road be **limited or** restricted until the completion of the IEA, as shown on Schedule D of this plan.

e. **East-west Collector north of Pipeline Study Area**

Alignment of the east-west collector road north of the Transcanada Pipeline (designated "Infrastructure and Utilities" on Schedule B) will be determined through the Block Plan process and shall be designed to permit development between the pipeline and collector road designed to provide enhanced visibility to the planned trail within the pipeline.

4.1.3 Active Transportation

b. *Walking and Cycling*

- i. **Except as outlined in 4.1.1 b. ii., all streets will have a sidewalk, and within the Local Centre - Kirby GO Transit Hub sidewalks should be provided on both sides of all streets. Outside the Local Centre-Kirby GO Transit Hub, in areas in proximity to schools, parks, transit stops and other public facilities, sidewalks on both sides of the street should be included through the development of the Block Plan required in accordance with Sections 10.1.1.14 to 10.1.1.26 of the VOP 2010 and the development approval process.**

	<p>iii. Remove <i>"It is the intention of this Secondary Plan that the Multi-Use Recreational Pathways be constructed and available for use to coincide with the occupancy of residential units."</i></p> <p>vii. Dedicated on-street or in boulevard cycling facilities shall be provided for on those Major Collectors and on Minor Collectors in the Local Centre - Kirby GO Transit Hub as identified on Schedule D." (Note Major Collectors and on Minor Collectors not noted in Schedule D)</p>
Section 5.0 (Parks and Open Space)	<p>We have identified the following concerns in Section 5.0:</p> <ul style="list-style-type: none"> o The goal of developing a minimum of 17 hectares of parkland development. o Modifications to require approximately 50% of the perimeter of the park fronting public streets "where feasible". o Parkland dedication policies that refer to VOP policies (7.3.3) that are under appeal <p>In general we are supportive of the updated parks and open space policy, however, understanding the calculations related to the minimum land area of parkland is important to confirm the appropriateness of Policy 5.1 b.</p> <p>We recommend the following revisions:</p> <p>"5.1.b While it is the goal to have a minimum of 17 hectares of parkland which includes approximately 14 hectares of parkland within the Block 27 Neighbourhoods located outside of the Local Centre - Kirby GO Transit Hub, and approximately 3 hectares of parkland within the Local Centre – Kirby GO Transit Hub, the statutory requirements for parkland dedication will apply. In addition, within the Hub Area, the 50% parkland dedication rate can be provided in the form of cash-in-lieu. To meet or exceed these targets, the City may require the dedication of parkland in addition to those identified in Schedules B and E, in accordance with the provisions of Section 7.3.3 of the VOP 2010."</p>

Section 6.0 (Natural Heritage Network)	We request that the policies include a requirement that all sections of the Natural Heritage Network within the Secondary Plan be further assessed and reviewed through the Master Environmental and Servicing Plan. In particular Sections 6.3 and 6.4.
Section 6.3 (Natural Heritage – Single Loaded Roads)	<p>We request the following minor revision:</p> <p>“6.3 Interface with the Natural Heritage Network <i>A key component of the plan is the provision of appropriate visual and physical connections to the Natural Heritage Network features. It is a target of this Secondary Plan that a minimum of 25% of all developable lands that abut the Natural Heritage Network features be developed with a single-loaded road, a public park, a stormwater management facility or other similar use. Should it be demonstrated that 25% frontage is not achievable due to such matters as, but not limited to, serviceability, topography or valley configuration, then the target may be revisited during the Block Plan process without amendment to the Official Plan. Development abutting the Natural Heritage Network features shall be designed in accordance with Section 9.1.1 of the VOP 2010.</i></p>
Section 6.4 (Net Positive Environmental Outcome)	<p>We request the removal of this policy entirely and any references to Net Positive Environmental Outcome for the following reasons:</p> <ul style="list-style-type: none"> • The Secondary Plan contemplates the conversion of an agricultural matrix into a heavily urbanized matrix, within which are embedded natural features. • Negative environmental effects at the landscape scale are unavoidable when land use in the matrix shifts in this manner. • While site-specific effects may be mitigated to some extent at the site level, this shift cannot be mitigated by design elements such as buffers and single loaded roads. It is known that many wildlife species react to landscape-level effects. • The natural systems in the plan area (southwest area excepted) are not particularly extensive and crossings of the system occurs in approximately nine locations (i.e., the proposed road network). At the site level (as well as the landscape level) this will inevitably affect functions such as ecological connectivity and habitat quality.

	A "Net Positive Environmental Outcome" is not a realistic expectation with respect to the natural environment, nor is it required by the Provincial Policy Statement.
Section 7.3 (Schools)	<p>Policy 7.3 incorrectly identifies seven elementary schools, when only six are illustrated on the Land Use schedule, which is consistent with our on-going dialogue with the school boards. We request the policy be revised as follows:</p> <p><i>"7.3 General locations are identified on Schedule C, Land Use Plan, for six elementary schools and one secondary school, including two shared sites based on consultation with the School Boards. One of the shared sites is located in the Community Hub. The precise location, size, phasing and number of future schools shall be determined with the School Boards as part of the development approval process. Subject to the satisfaction of the City and the School Boards, the school sites identified on Schedule C may be relocated without amendment to the Plan. The size and configuration of each school site shall be consistent with the policies and requirements of the respective school board and shall conform to Provincial and Regional policy and the policies of the VOP 2010 and this Plan."</i></p>
Section 7.4 (Day Care)	<p>We request that Policy 7.4 be revised as follows:</p> <p><i>"7.4 Where possible Day care is encouraged to be provided in the early phases of the development of Block 27 and integrated with community facilities , mixed-use developments and residential developments ."</i></p>
Section 8.1 (Services and Sustainable Development)	<p>Section 8.1.1.c refers to the need to identify life costs. Life cycle cost analysis is a broad approach and should be more clearly defined, in particular to identify how far back into the life cycle the costs should be analysed. Also delete the word full in reference to life cycle costs.</p> <p>Section 8.4.2. f. states that downstream increases in flooding and erosion should not be allowed. This policy should be reworded to limit this to any works related to Block 27.</p>

Section 8.2	<p>To provide additional flexibility, we request that Section 8.2 be revised and expanded as follows:</p> <p>8.2.1 Stormwater management in Block 27 shall be in accordance with the directions in Section 3.6.6 of the VOP 2010; the Block 27 Secondary Plan Subwatershed Study (Upper West Don Subwatershed Study) and the Master Environment and Servicing Plan developed as part of the Block Plan process required in accordance with Sections 10.1.1.14 to 10.1.1.26 of the VOP 2010. In addition, the applicable policies of the Approved Source Protection Plan: CTC Source Protection Region will be applied. New stormwater management facilities shall be permitted in the Greenbelt Plan Area, subject to the applicable policies of the Greenbelt Plan.</p> <p>8.2.3 New stormwater facilities that employ up-to-date technologies and techniques, including but not limited to subsurface stormwater management ponds, multiple use stormwater facilities, etc. shall be permitted.</p>
Policy 8.5.2.a (Energy Efficiency)	<p>Further clarification is required regarding "behavior change initiatives". We request that Policy 8.5.2.a be revised as follows:</p> <p><i>"8.5.2.a. Energy Efficiency – All new buildings will be required to demonstrate the potential for improved energy efficiency strategies through approaches related to factors such as building design, and efficient technologies."</i></p>
Policy 9.2.3 (Infrastructure)	<p>We request that this policy be revised to state, "...the City shall require that landowners enter into an agreement ..."</p>
Policy 9.4 (Phasing)	<p>The Phasing policies continue to place priority to the Local Centre – Kirby GO Transit Hub as the first phase of development and subsequent phases not proceed until the first phase is substantially (approximately 75%) complete. In our opinion, the phasing plan should be completed through the Block planning process and Policies 9.4.2 and 9.4.3 should be revised as follows:</p> <p><i>"9.4.2 The first priority shall be the development of the Kirby GO Station facilities in the Transit Hub including parking and access area. Development of the lands in the Local Centre - Kirby GO Transit Hub and the remainder of the secondary plan area may proceed either in advance or concurrently</i></p>

with the development of the Kirby GO Station facilities, as soon as water and wastewater services are available.

9.4.3 The phasing of development will reflect the availability of water and wastewater services based on an order established through the Block planning process. The phasing plan shall ensure that any particular phase of development is substantially complete before subsequent phases may be registered. Planning controls such as holding by-laws will be used to ensure that development does not occur until water and wastewater services are available. The allocation of services will be confirmed through the execution of applicable subdivision, condominium and site plan agreements and determined through a Block Plan agreement."