

**WESTON
CONSULTING**

planning + urban design

Mayor and Members of Council
c/o Mr. Jeffrey Abrams, City Clerk
City of Vaughan
2141 Major Mackenzie Drive
Vaughan ON
L6A 1T1

November 1, 2016

File 7550/7672

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COMMUNICATION
CW (PH) - <u>Nov 1/16</u>
ITEM - <u>2</u>

Dear Mayor and Members of Council,

**RE: Community Area Policy Review for Low-Rise Residential Designations
Amendments to the Vaughan Official Plan 2010 (City File No. 15.120.1)
Committee of the Whole (Public Hearing) on November 1, 2016**

Weston Consulting is the planning consultant for Sunfield Homes and is currently working with our client on multiple infill projects in the City. At this time, no formal applications have been filed; however, we have discussed potential development concepts with City staff and completed a formal pre-application consultation process with one of the projects.

This letter is provided in response to the Draft Official Plan Amendment for the Community Area Policy Review for Low-Rise Residential Designations to be heard at the Committee of the Whole Public Hearing scheduled for November 1, 2016. The following preliminary comments are provided in addition to previously provided correspondence on October 4, 2016 regarding *Urban Design Guidelines for Infill Development in Established Low-Rise Residential Neighbourhoods* ('Guidelines').

The proposed amendment to the Official Plan appears to contradict an important component of the Guidelines. The third paragraph in Section 1.2 of the Guidelines acknowledge that the requirements outlined within the document are guidelines only. This is very important and we previously recommended that the City bold and/or underline this text prior to approving this document. It is our understanding that this paragraph was not emphasized in the final version of the guideline adopted by Council. This paragraph states, in part, the following:

"...not all of the design guidelines listed in this document will apply or be appropriate in every infill situation. Exceptions to the guidelines may be considered by City staff to be acceptable and will not require Council approval. Where an exception is proposed, however, the applicant will be required to demonstrate that the guidelines cannot be satisfied given the conditions of the site, and that the exception will not prevent the development from meeting the intent of the Official Plan."

Infill development projects all have their own unique constraints and characteristics. It is not realistic to assume that each individual infill project will be able to comply with all the guidelines provided in this document. The proposed amendment to the Official Plan is now making many of the guidelines formal policies in the Official Plan and removing any ability for deviation occurring without Council approval through an Official Plan Amendment. This contradicts the flexibility of the guidelines that staff recently supported and recommended to Council on the basis of good planning principles.

The following list, while not exhaustive, provide examples of proposed policies that are more appropriately dealt with through guidelines that would allow flexibility in keeping with the third paragraph of Section 1.2 of the Design Guidelines referenced above:

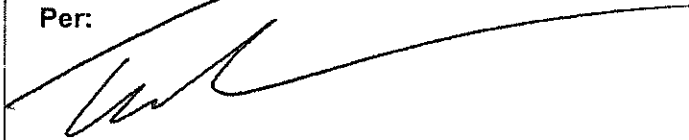
1. **Frontage and Access onto Arterial Streets:** Although provisions have been made to allow properties adjacent to Arterial Streets to intensify, in many cases these properties do not have direct access to the arterial street. It would appear that the City is contemplating restricting intensification in the form of semi-detached and townhouse dwellings to only those properties that both front and have access to an Arterial Street.
2. **Adjacent and Immediately Surrounding Context –** Revisions being considered to Policy 9.1.2.2(e) require new development to respect and reinforce the height and scale of adjacent and immediately surrounding residential properties whereas currently the Official Plan requires new development to respect and reinforce the height and scale of nearby residential properties. This further scoping the geographic extent from 'nearby' to 'adjacent and immediately surrounding' is overly restrictive. It is reasonable for variation to occur in the height and scale of development within a community and a proposed development should not be held to the same standard of the adjacent and immediately surrounding properties when other development nearby but slightly further away may be consistent with what is being proposed.
3. **Prohibition on Stacked and Back-to-Back Townhouses:** Townhouses are now subject to Policy 9.2.3.2 which states that *"For clarity, back-to-back and stacked townhouses shall not be permitted in areas designated Low-Rise Residential"*. This prohibition on more affordable forms of low density housing should be removed. Instead, the development of these building types in low-rise residential areas of the City should be subject to design guidelines and a specific zoning that ensures only appropriate sites are developed for stacked and back-to-back townhouses.
4. **Lot Frontages:** Revisions being considered to Policy 9.1.2.3 with respect to lot frontages would prohibit lot creation resulting in new lots that do not equal or exceed "the frontages of the adjoining lots, or the average of the frontage of the adjoining lots where they differ." This contradicts other proposed changes that do permit, subject to conditions, semi-detached and townhouse dwellings along arterials that would likely require reduced lot frontages when compared to adjoining lots.

We appreciate your consideration of the above and look forward to further participation in the Official Plan Review process. Please provide us with future notice of meetings, reports or draft policies in relation to this matter. Should you have any questions, please contact the undersigned at (ext. 232) or Michael Vani (ext. 252).

Yours truly,

Weston Consulting

Per:



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Associate

- c. Larry Lecce, Sunfield Homes (email only)
Roy McQuillin, Melissa Rossi, Bill Kiru & Clement Messere, City of Vaughan (email only)