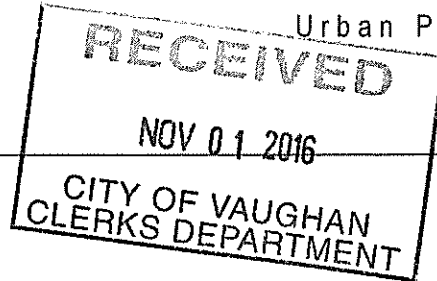
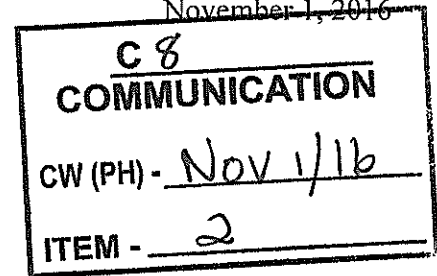




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November 1, 2016



By E-Mail Only to jeffrey.abrams@vaughan.ca

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

Attn: Mayor Maurizio Bevilacqua and Members of Council
c/o Jeffrey A. Abrams, City Clerk

Re: Item 2: Committee of the Whole Meeting, November 1, 2016
Community Area Policy Review for Low-Rise Residential Designations
Proposed Amendments to the Vaughan Official Plan 2010

Evans Planning Inc. are the planning consultants for Centreville Homes (Merino) Inc. and Centreville Development Corporation. For the past several years, our Client has been actively pursuing development applications within the *Low-Rise Residential* designation, including working with City Staff, attending at Council meetings and public meetings, and participating in the process associated with the Community Area policy examination. Our Client initiated an appeal to the earlier Interim Control By-law (Ontario Municipal Board Case No. PL141252).

We have actively participated throughout the process associated through a series of submissions to the City and the attendance at the open house meeting summarized below:

- March 1, 2016 – Submission addressed to Mayor Bevilacqua and Members of Council:
 - Item 14: Committee of the Whole Meeting, March 1, 2016 Community Area Policy Review for Low-Rise Residential Designations Centreville Homes (Merino) Inc., 9770 Keele Street, Vaughan Centreville Development Corporation, 9846 Keele Street, Vaughan Implementation Options Community Area Policy Review for Low-Rise Residential Designations;
- May 10, 2016 – Open House:
 - North Thornhill Community Centre, Room A/B; 300 Pleasant Ridge Ave, Vaughan, Ontario;
- May 31, 2016 – Submission addressed to Kyle Fearon, Policy Planning & Environmental Sustainability:



- Implementation Options: Community Area Policy Review For Low-Rise Residential Designations, 9846 Keele Street, Part of Lot 19, Concession 4, City of Vaughan;
- October 5, 2016 – Correspondence to Committee of Whole Item 9:
 - Verbal Communication regarding community area policy review for low-rise residential designations adoption of urban design guidelines for infill development in established low-rise residential neighbourhoods file 15.120.2 wards 1 to 5;

Upon reviewing the Staff Report, which was made publicly available on Thursday, October 27, 2016, we believe that the proposed amendments to the Vaughan Official Plan 2010 (VOP 2010) and Urban Design Guidelines are prohibitive in context, restrictive in nature, provide for an inefficient use of land and municipal services and are contrary to the Provincial mandates regarding intensification.

These policies ultimately create impossible conditions to accommodate residential townhouse developments within the City of Vaughan's Low-Rise neighbourhoods and if applied in as written are effectively, prohibitive to the intensification efforts which contemplated medium-density development and promote stagnation as redevelopment is encouraged to not alter the existing character of the neighbourhood.

Lastly, enforcing these policies is contradictory to that of the recent Provincial recommendations regarding the 2015 Coordinated Land Use Planning Review, conducted by the Ministry of Municipal Affairs and Housing. The Advisory Panel's recent recommendations of an additional 60 per cent of annual new residential development is to be directed to the existing built-up areas within the municipality. It is their mandate to direct the concentration of growth toward arterial roads, to support the large investment in public transit. It is logical then, the focus of townhouse redevelopment, subject to appropriate building standard setbacks, within By-law 1-88, should be directed toward arterial roads.

Proposed Vaughan Official Plan (VOP) 2010 Amendments: Prohibitive Policies

With respect to the *Community Area Policy Review*, the approach by Urban Strategies Inc. is to provide for a "one size fits all" solution to Vaughan's *Low Rise Residential* neighbourhoods, when in fact, many neighbourhoods are unique and such amendments would be detrimental to City-wide development.

Upon review of the policy amendments, a rationale below identifies how the proposed amendments and urban design guidelines are prohibitive in context of matching existing technical criteria, restricted to areas of existing townhouse developments and provide for an inefficient use of land and municipal services.



Prohibitive in Context

The Urban Strategies Inc. report indicates that “infill townhouse developments on arterial streets in low-rise residential areas can fit compatibly with each distinct type of neighbourhood in the city” within Section 2.4. The report states that such a condition can exist if the pattern of landscaping, building orientation, setbacks is maintained. Since townhousing, is by its very nature a different form of housing—namely more intense, typified by smaller lots, shorter frontages, lesser setbacks, higher coverages, this condition cannot be achieved, and in essence the setting cannot be created where townhousing can meet these standards. The criteria provided in the proposed policy will hinder, if not eliminate, the creation or redevelopment of townhouse development along arterial roads such as Keele Street.

The report also recognizes the older larger lots located within the older communities of the City. The clear intent of policy and guideline amendments is to prevent the redevelopment of these locations, regardless of the context of the area. Large lots fronting onto busy arterial roads may no longer reflect an appropriate form of residential use and could be candidate sites to provide alternate housing choices and to utilize local centre land more efficiently. However, with the introduction of policies which require frontages to equal to that which exists, the requirement to continue to maintain outdated setbacks, and lot coverages created in times past will prohibit the opportunity to redevelop lands which may possess desirable redevelopment qualities.

Although medium-density housing may not exist along or immediately adjacent to some arterial roads within the *Low Rise Residential* designations, the gradual evolution to an alternate built form along a prominent arterial roads is discouraged, and the larger scale benefits from this transition are effectively lost. It is the Provincial, Regional and Municipal mandate to allocate and direct growth along arterial roads to support the large investments made in public transit. Opportunity should be made available in the Official Plan for the arterial streetscape to be dynamic and allow for change appropriately over time as alternative forms of housing are often needed to sustain the long term viability of areas.

Restrictive in Nature

Another narrative of the proposed policies and guidelines is to “...ensure new townhouses are only introduced where they already exist”. Until each situation is assessed on its own merits, it is unreasonable to impose a blanket control that townhouses can only be redeveloped where other townhouses presently exist.

Limiting building typology will reduce and suppress the opportunity for providing affordable housing with the City, and would significantly reduce the opportunity to offer a range of mix of housing types and limit to areas comprised of singular building typologies. In the existing



Low Rise Residential neighbourhood, medium density developments have previously been approved, often in proximity to the existing single family subdivisions and over time, have become integrated into the fabric of the community. These developments now play a vital role in the provision of alternate forms of housing choices in Vaughan. Located at 9589 Keele Street, “Villas in Old Maple”, is an existing medium density development constructed in 2013, within the *Low Rise Residential* designation. The built form is two storeys in height and consists of 22 units. In addition, a four storey apartment building is located nearby, at 9519 Keele Street.

It is clear from the examples above, that the City of Vaughan has recently accepted applications for medium density developments within proximity to single family subdivisions. According to the policy amendments put forth by the study, these developments would not be considered as they alter the general character of the established neighbourhoods. It is fair to say that these redevelopments have become part of the existing fabric and are functioning well while adjacent to existing single detached dwellings. Further proven, the issue of compatibility was measured based on the function of coexistence between the differing building typologies.

We respectfully submit that the criteria of this proposed policy be amended to allow for the opportunity of townhouse development along arterial roads, by reinforcing the notion that compatible, does not necessarily mean identical. The provision of adequate buffering in the form of separation of landscaping or architectural treatment should be employed rather than developing controls which cannot be satisfied. It would appear that the language addressed within these policies are to limit or permanently prevent any townhouse development where there is not any previously existing townhouse development which includes “arterial areas” defined in the study

Inefficient Use of Municipal Land & Services

The proposed amendments create situations that do not represent an efficient use of land and municipal services. The amendments do not address situations wherein the lands to be developed are large in size and possess considerable depths. This provision does not support the creation of lane-fronting units. Consequently, prime urban lands will only be able to re-develop at an inefficient scale. The provision to require new units to front onto a public street will prevent urban lands from being utilized wisely and efficiently. The redevelopment of many large lots in Vaughan, under this policy regime, would stifle the use of the rear portions of these landholdings. The result would be an inefficient, irregular pattern of development and would result in the underutilization of many sites capable of supporting townhouse redevelopment.

Further, the qualifying criteria needed to facilitate medium density redevelopment are such that it is virtually impossible to achieve. The policy amendments provided do not afford the opportunity for many areas of Vaughan, to move forward with a built form transition.



It is suggested that the policies be revised to recognize the locational attributes of any particular site seeking medium-density residential development. Said conditions should reflect the arterial road, access to public transit and other community amenities as criteria for key locations of redevelopment.

We believe that the proposed amendments create situations that do not represent an efficient use of land and municipal services, and do not promote growth within neighbourhoods.

Stacked Townhouses should be permitted along arterial roads as within Section 9.2.3.3 of the VOP 2010, as they are an attached *Low-Rise Residential* building form. This form of development represents an efficient use of land and can be an alternative to properties with large, wide frontages and shallow depths.

It is clear that enforcing these policies is opposite that of the recent Provincial recommendations regarding the 2015 Coordinated Land Use Planning Review, conducted by the Ministry of Municipal Affairs and Housing. The policies effectively suffocates growth in these areas and directly contradicts the recent recommendations issued by the Advisory Panel with respect to preventing the additional 60 per cent of annual new residential development directed to the existing built-up areas within the municipality.

2015 Coordinated Land Use Planning Review

As part of the 2015 Coordinated Land Use Planning Review, conducted by the Ministry of Municipal Affairs and Housing, the Advisory Panel for the Policy Review has released its recommendations on May 10, 2016 for consideration to changes to the four Provincial Plans:

- The Growth Plan for the Greater Golden Horseshoe
- The Greenbelt Plan
- The Oak Ridges Moraine Conservation Plan
- The Niagara Escarpment Plan

Given the pressures of significant growth within the Province, strategies have been developed to forecast growth and to establish criteria policies for building complete communities. Specifically, the following three amendments have a direct impact on the subject land and the City of Vaughan as whole:

- Strengthening protections for employment lands and transit corridors
- Requiring zoning along transit corridors to provide adequate density to support transit



- Requiring at least 60 per cent of annual new residential development to be within the exiting built-up area of a municipality

It is evident that the findings of the initial policy direction of the 2015 Coordinated Land Use Planning Review and above proposed amendments, is that it is good planning to direct additional growth and concentration of populations to existing transit corridors and arterial roads. The local implication for the proposed policies and guidelines is that it would seem increasingly logical to locate increased density forms of development along these transit corridors, such as Keele Street. In order to reap the benefits of focused urban growth, it is imperative to support the Provincial and Municipal investments in public transit infrastructure along these corridors. Therefore, it is suggested that the potential amendments and guidelines to the VOP 2010 be revised to reflect these latest policy directive to encourage appropriate density increases where municipal service utilization can be maximized.

Summary

Given the relatively recent approval of the existing VOP policies, which included significant consultation and public engagement, we believe the existing policies do not require specific criteria relating to technical matters such as matching adjacent setbacks, orientation only on public streets and limiting townhouse typology to location that contain existing townhouse typologies.

We respectfully request, that the policies contained within the Urban Strategies Inc. report not be adopted, as it is submitted that they are inordinately restrictive and on an overall basis counter-productive to modern-day city building principles. The recommended policies and guidelines are prohibitive and conflicting in nature. While policies generally acknowledge that townhouse development may be appropriate for lands adjacent to the arterial road system, the implementing policies would be difficult, if not impossible, to satisfy, thereby negating the opportunity to redevelop with medium density residential uses.

It is the policy mandate of the Province, Region and the City of Vaughan to concentrate new population growth and densities within the municipality toward arterial roads, community services and recreational amenities. Therefore, medium density redevelopment should be promoted at appropriate locations adjacent to arterial roads.

Street townhouses, as per the VOP 2010 are considered *Low-Rise Residential*, grade-related uses. It is evident that throughout many other municipalities and the specific sites mentioned in this correspondence, multiple-unit dwellings can coexist adjacent to single family dwellings, provided an adequate buffer is utilized.



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Furthermore, in light of recent Provincial recommendations regarding the 2015 Coordinated Land Use Planning Review wherein the Advisory Panel has recommended that 60 per cent of annual new residential development is to be directed to the existing built-up areas within the municipality, alternative, efficient forms of housing in appropriate locations should be encouraged, rather than stifled. It would seem that the product of the recommended policies brought forth in this study, will hamper the potential for future residential growth to utilize the amenities associated with an arterial road location.

On behalf of our Client, I would like to thank you for the opportunity to provide this letter to you.

Should you have any questions with respect to the foregoing, please do not hesitate to contact the undersigned.

Yours truly,

Paul Tobia
Associate Planner
Evans Planning Inc.

cc Mr. 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, Policy Planning
Centreville Homes (Merino) Inc.,
Centreville Development Corporation