

To: City of Vaughan

September 14, 2020

Office of the City Clerk

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Vaughan, Ontario

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clerks@vaughan.ca

Attention: Todd Coles

COMMUNICATION – C28

ITEM 4

Committee of the Whole (Public Hearing)

September 15, 2020

Re: Comments to Revised Official Plan Amendment File OP.08.016 and Zoning By-Law Amendment

Application Z.16.008 and LPAT Case No. PL170151 to develop lands at 7553 Islington Ave. and
150 Bruce St.

Dear Mr. Coles,

On behalf of the residents of Bruce and Helen Streets, Majesty and Highness Courts, Pioneer Lane and of the Vaughanwood Ratepayers Association, I am writing to you to express our great objection towards the revised plans of the proposed development of the above subject lands. This is the third submission of this application. The applicant first initiated his plan in 2008 to allow for 2 twenty-two storey buildings and underground parking and an emergency bridge access onto Bruce Street. In June of 2012, he appealed to Vaughan's Official Plan 2010 for leniency to accommodate his plans. In 2016 the project had been revised and the application was resubmitted to allow for 2 nineteen storey buildings, a 7 level of underground parking, an access ramp to this parking facility from Bruce Street and an emergency access bridge onto Bruce Street. In 2019, yet again, the applicant has revised his plans and resubmitted his application to allow for 1 twenty-one storey building, a 7 level of underground parking consisting of 549 spaces and 318 bicycle spaces and an access ramp to this parking facility from Bruce Street and an emergency bridge access onto this same street. This recent submission is accompanied by numerous surveys and studies to support and justify his proposal in his attempt to meet the environmental requirements of the TRCA but no matter his attempts to address the requirements, he has simply "repackaged" his proposal and fallen very short of these requirements. The subject property is designated as Open Space and Low Rise Residential according to the City of Vaughan's OPA 240 (Woodbridge Community Plan). The lands are also designated as Natural Heritage areas by the Vaughan Official Plan (VOP 2010). They are also zoned for Open Space Conservation, Agricultural Zone and R1 Residential (single family dwelling) as per Zoning By-Law 1-88 and they are within a Regional Storm Flood Plain, as such, the Toronto and Region Conservation Authority (TRCA) does not allow development on a flood plain nor in areas that are designated as conservation. The proposed uses in this application are not permitted nor do they conform under these designations as they reiterate land uses being re-zoned from "open space/ low density to high density" [1].

The following points will highlight the reasons why these subject lands are not desired lands for such a development:

- In the resubmission of this application, the proposed development is still located in a flood plain (i.e., the primary access onto Islington Ave. and the base of the building and its immediate surrounding area) within a significant river valley of the Humber River Watershed which is not permitted as per the Provincial Policy Statement 2005 (PPS) and the TRCA's Valley and Stream Corridor Management Program (VSCMP). Section 3.1 of the PPS establishes policies related to Natural Hazards so that development is directed away from these hazards. Subsection 3.1.1 states that, "development shall generally be directed to areas outside of hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding and/or erosion" [1].
- "These are considered hazardous lands and unsafe for development due to naturally occurring processes. As such, development and site alterations should be directed away from these hazardous lands. The current proposal does not respect these guidelines. Furthermore, both proposed access points to the property are within the natural hazards... there is no safe access to the proposed development" [3].
- "The overall objective of the VSCMP policies is to prevent new development from occurring in areas that may introduce risk to life and property associated with flooding during extreme weather conditions, erosion and slope stability... no new development is permitted within valley and stream corridors" [1].
- The applicant is proposing to develop in a heavily wooded area which provides a natural habitat for many species. The removal of trees that will take place to accommodate this kind of development will cause irreversible damage to vegetation and animals and have a significant negative impact on the natural heritage of this area. "The natural heritage system or Greenlands System is recognized and clearly mapped out in the York Region Official Plan (2010) and the TRCA Terrestrial Natural Heritage System Strategy (2007). The natural features and natural hazards on the site meet the policy tests of these plans and of the Provincial Policy Statements (PPS) (2014) for recognition and protection. The site is within a significant valleyland and a significant woodland. Development and site alteration are proposed in those significant natural features, which is contrary to all relevant policy regimes" [2].
- "A common theme within the PPS is that municipalities should accommodate growth, in part, through intensification which is defined as the development of a property, site or area at a higher density through; redevelopment including brownfield sites, development of vacant and/or underutilized lots within previous developed areas, infill development and the expansion or conversion of existing buildings" [4].
- "The provisions of the PPS emphasize the need to plan and promote intensification however, it needs to be done in a manner that takes into consideration the existing building stock or areas and must be based on development standards established by the planning authority. Intensification shall be promoted, but each municipality must develop its own standards to ensure intensification is suitable to the surrounding neighbourhood fabric" [5]. The City of Vaughan clearly identifies where intensification shall occur as per Land Use Schedule 13. Please refer to this Schedule for further information which outlines all designated preservation of green space.

- “The Growth Plan for the Greater Golden Horseshoe 2017/Growth Plan 2019 stipulates planning for growth and development in a way that support economic prosperity, protects the environment and helps communities achieve a high quality of living as per Section 1.2 of this plan” [4].
- “This proposal clearly conflicts with the 2017/2019 Growth Plan for the greater Golden Horseshoe as it does not direct intensification to a strategic growth area, and it destroys natural heritage areas. The City of Vaughan goes to great lengths to direct intensification to areas that are best served with municipal services and transit. This location, far away from identified intensification lands, within a natural heritage area, and subject to flooding, is not keeping with any of the Provincial or Municipal Policy Documents” [4].
- The applicant has now revised his plans and proposes to build into the valley wall in his attempts to reduce the use of the flood plain. This would require significant grade modifications and cutting into the slope which cannot be permitted as it destabilizes the land due to erosion. Furthermore, the construction of this massive building and its underground garage would require extensive excavation and removal of trees. The devastation of this Open Space will have severe impact on the ecological balance and of the biodiversity of the natural heritage system.
- The landowner continually highlights local current developments that are nearby and claims that his proposals for development be considered as well. Many of these projects are far removed from the natural hazards or ecological issues and are located within the Highway 7 corridor where intensification has been allocated by the province.
- This area is not under Special Policy which allows for some redevelopment by the province where historic development in the flood plain has occurred” [3].
- To accommodate this level of development, Transportation Planning at the Region would need to propose that the Bruce Street access be converted to a “permanent full moves intersection” at Bruce Street and Highway 7 [6], which may not be desirable nor feasible considering Bruce Street narrows significantly at the end of it. Bruce and Helen Streets are in a horseshoe form. There are no other exits to this subdivision. “The infrastructure improvements needed to accommodate this development far outweigh the perceived benefits that it may have” [5].

In conclusion, It is abundantly clear that the applicant is completely ignoring guidelines, rules and regulations and suggestions repeatedly made by the TRCA, the City of Vaughan, York Region, the Province, and the Greater Golden Horseshoe Growth Plan. In recent conversations with the Senior Planners of the TRCA and of the City of Vaughan, it has been indicated to me that neither agency will likely accept this proposal nor issue a permit to allow for such a development in an environmentally compromised site. This is not developable land! Our applicant was told after each previous submission that what was allowed was simply a renovation of the existing structures on site and nothing further to that. This sheer defiance of rules and regulations stipulated by the City of Vaughan’s Official Plan, the Provincial Statement, the TRCA’s Valley and Stream Corridor Management Program, York Region’s Plan, and the Greater Golden Horseshoe Growth Plans is nothing short of a total waste of time, resources and tax payers’ monies, not to mention the time that is invested by personnel at all levels of jurisdiction at the municipal and provincial levels and of the residents in the area who are effected. **Applications of proposals for development in significant river valleys such as this proposal should not be allowed!** This applicant is simply pushing the boundaries only for personal capital gain and not to enhance growing communities. We, the

residents, are not against urban development and progress. We encourage progress within appropriate measures while adhering to Municipal, Regional and Provincial Growth Plans. We must preserve our limited green space!

We would like to remind our very interested parties of the recent tragic natural disasters due to global climactic changes that have caused severe flooding and devastation; Toronto 1954 (Hurricane Hazel), New Orleans 2005 (Hurricane Katrina) and again in 2019, Huston, Texas 2017, and closer to home; the Toronto Island 2017 and 2019, the Muskokas 2018 and 2019, the Kawarthas 2018 and 2019, and Fredericton New Brunswick 2019. All these areas have been subject to flooding because these communities have been built on flood plains. Since Global Warming is currently a reality and we have had many severe weather patterns in North America and throughout the world in recent years, we, in our community of Vaughan, are not in any way immune to this environmental risk.

Therefore, we are asking the City of Vaughan to reject this ridiculous application once and for all, as again, this land is not developable! There is absolutely no point in revisiting the landowner's proposals every few years as the results are the same each time unless he scales it down dramatically to a simple renovation of the existing structures on site. We, the residents of this area and the Vaughan Ratepayers Association do not support this project as you can clearly see in our preceding petition of 2020!!

Thank you for your attention to this matter.

Sincerely,

Elisa Testa

■ Bruce Street

Woodbridge, Ontario

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References

- [1] Letter and comments by Toronto and Region Conservation for the Living City to Mr. Lorenz Schmidt, Balor Development Services Ltd., July 28, 2008
- [2] Letter and comments by Toronto and Region Conservation for the Living City to Mr. Eugene Fera, Planning and Development Department, City of Vaughan, February 2, 2017
- [3] Letter and Comments by TRCA to Ms. Caputo, Planning and Development Department, City Of Vaughan, April 20, 2020
- [4] Provincial Policy Statement (2014)
- [5] York Region Report prepared by Karen Whitney to Mary Caputo Planning and Development Department, City of Vaughan, May 13, 2020