

# ATTACHMENT 11



Corporate Services

May 13, 2020

Mary Caputo, Hon. B.A., MCIP RPP  
Senior Planner  
Development Planning Department  
City of Vaughan  
2141 Major Mackenzie Drive  
Vaughan, ON L6A 1T1

Dear Ms. Caputo:

**Re: Proposed Official Plan Amendment  
Second Circulation  
7553 Islington Avenue and 150 Bruce Street  
City of Vaughan  
Vaughan File No.: OP.08.017  
York Region File No.: LOPA.16.V.0034**

This is in response to your circulation and request for comments for the above-captioned revised Official Plan Amendment (OPA) application. It is our understanding that the proponent has appealed this site specific OPA application (for non-decision in 2017) and the Vaughan Official Plan 2010 (VOP) (for Natural Areas designation in 2012) to the Local Planning Appeal Tribunal (LPAT). As such, the LPAT is the approval authority of the proposed OPA application.

The subject site is 1.78 ha in size and is located on the east side of Islington Avenue and south of Highway 7, on lands municipally known as 7553 Islington Avenue and 150 Bruce Street, in the City of Vaughan. The 2016 proposed development and the current revised proposed development are compared in the following table:

	<b>2016 Proposal</b>	<b>Current Proposal</b>
Number of Res. Units	490	530
Number of Towers	Two	One
Height	19	21
Gross Floor Area (sq.m.)	51,000	49,000
Number of Parking Spaces	494	549
Levels of Underground Parking	7	7
FSI Density	2.87	2.82

### **Purpose and Effect of the Proposed Amendment**

According to the applicant's Planning Justification Report, prepared by Weston Consulting, dated July 2019, the Official Plan Amendment application will amend OPA 240 – The Woodbridge Community Plan, by redesignating the subject property from “Open Space” to “Mid-rise Residential”. The proposed Amendment will also amend the new Vaughan Official Plan (2010), Schedule 1: Urban Structure, by redesignating the portion of the property located outside of the floodplain from “Natural Areas” and “Countryside” to “Community Areas”, and amend Schedule 13 – Land Use, by redesignating the portion of the property located outside of the floodplain from “Natural Areas” to “Mid-Rise Residential”. The proposed Amendment also adds new site specific policies to permit a maximum height of 21-storeys and a maximum density of 2.82 FSI.

The Vaughan Official Plan (2010) proceeded through a lengthy and thorough municipal comprehensive review. The strength of the new Official Plan is in balancing all the competing interests associated with an urbanizing municipality; including protecting and sustaining the planned urban structure and the natural heritage system. The subject lands are not located within an area identified for intensification. Intensification areas have already been appropriately identified through the approved urban structure and policies of the new Vaughan Official Plan.

The OPA proposes to change the designation to Mid-Rise Residential. But according to VOP policy 9.2.3.5.a, the maximum height of mid-rise residential buildings is 12 storeys. High rise residential buildings are greater than 12 storeys. It appears the OPA should be changing the designation to High-Rise Residential. Also, according to VOP policy 9.2.2.3.a and 9.2.2.5.a, lands designated for Mid-Rise Residential and High-Rise Residential are generally located in intensification areas. The subject site is not located in an intensification area.

### **2010 York Region Official Plan**

According to Map 1 – Regional Structure and Map 2 – Regional Greenlands System, the vast majority of the subject lands are designated “Regional Greenlands System” and a narrow portion of the subject lands, parallel to Bruce Street, are designated “Urban Area”. Map 2 also shows the subject lands to be within the “Greenlands System Vision” corridor. Map 5 – Woodlands shows the subject lands to be within the “Woodlands” designation, and according to Map 14 – Highly Vulnerable Aquifers, portions of the subject lands are affected by highly vulnerable aquifers.

According to the current Regional Official Plan and the Vaughan Official Plan, there are many layers of environmental land use designations and policies affecting the subject lands. York Region defers the detailed environmental assessment to the Toronto and Region Conservation Authority (TRCA), who have the expertise to appropriately provide technical comments. Through our Partnership Memorandum for Planning Services, TRCA provides technical review of natural heritage matters and advice to the Region and local municipalities.

The Regional Official Plan prescribes an urban structure focused on a system of Regional Centres and Regional Corridors. This policy direction has been well entrenched since the Region's first Official Plan (approved in 1994). The Regional Centres and Corridors are intended to accommodate the highest concentration of intensification. To facilitate the anticipated growth, a substantial amount of capital investment has been committed to build a rapid transit system on the Highway 7 and Yonge Street corridors. As such, it is a Regional interest to ensure appropriate levels of intensification occurs within these corridors. It is also important for developments that are not in a Regional Centre or on a Regional Corridor be subordinate in height and density to those typically intended for the Regional Centres and Corridors.

The proposed development is for a 530 unit high density residential use, at a density of 2.82 FSI in a 21-storey building. This level of density and intensity are more appropriate along a Regional Corridor or in a Regional Centre. While Regional staff generally leave the determination of site specific heights and densities to the local municipality, Regional staff also considers that the proposed height and density range need to be within a desirable range, relative to the planned function of the Regional and local urban structure.

York Region Community Planning staff have received and reviewed the comment letter provided by the TRCA, dated April 20, 2020. Community Planning staff support TRCA's recommendations, position, and conclusions. TRCA does not support the proposed development. The subject property is within the Humber River valley and is entirely within a natural heritage system. Development and site alteration are proposed in TRCA's Regulated Area, in the Natural Heritage System, in Significant Natural Features, in Hazardous Lands, and where there is no safe access. It is the position of TRCA staff that this is a major intrusion into the natural heritage system, and cannot be considered to be a minor refinement to it. The construction impact from the removal of woodland vegetation, excavation into the valley wall and fill placement in the flood plain all in an effort to accommodate a high density residential building, in an area not intended for intensification, does not represent good planning.

### **Transportation Planning Comments**

Regional Transportation staff have reviewed the above noted application along with the Traffic Impact Study report update dated May, 2019 prepared by Mark Engineering. The following consolidated comments are provided in coordination with staff from Transportation Planning, Traffic Signal Operations and Development Engineering:

#### **A. OPA Comments**

While the Region does not support this application, through the LPAT process, the following comments will need to be addressed :

1. The Transportation Study provided is not consistent with the format and recommendations of the Region's Transportation Mobility Plan Guidelines for

Development Applications (November 2016). At a minimum, the Study shall be revised to include the assessment of active transportation modes for the future total conditions. Recommendations and implementation plan related to sidewalk connections, missing links, direct pedestrian and cycling connections to transit stops and existing active transportation facilities shall be provided in the revised Transportation Mobility Plan Study.

2. The proposed development recommends an emergency access onto Bruce Street. However, this emergency access onto Bruce Street shall be converted to a full move access for both vehicles and pedestrians to provide future residents with access to the existing traffic signals at the Highway 7/Bruce Street intersection and existing schools.
3. Implement an exclusive northbound right turn lane on Islington Avenue at the proposed access to accommodate development traffic. In addition, the existing two-way left turn lane on Islington Avenue shall be re-stripped to provide exclusive left turn lanes, to the satisfaction of the Region. A detailed design drawing and cost estimates shall be submitted for Region review.
4. The Traffic Impact Study shall be revised to include the analysis of signalized intersections of Highway 7 with Islington Avenue and Bruce Street.
5. The 2019 Study update uses traffic count data collected in 2015. In general, the Region does not accept traffic count data more than three years old. The Study update shall establish the validity of the traffic counts by comparing them with the latest traffic counts.

B. Preliminary Conditions/Comments for Subsequent Development Application for this site

Prior to final approval, the Owner shall agree:

1. To provide a basic 36 metre right-of-way for this section of Islington Avenue. As such, all municipal setbacks shall be referenced from a point 18.0 metre from the centerline of construction of Islington Avenue and any lands required for additional turn lanes at the intersections/accesses will also be conveyed to York Region for public highway purposes, free of all costs and encumbrances, to the satisfaction of the York Region Solicitor.
2. In the Site Plan Agreement to provide interconnections with adjacent developments or existing communities in order to consolidate and reduce the number of accesses onto Regional roads (as per the Regional Official Plan Policy 7.2.53), where appropriate.
3. In the Site Plan Agreement that the proposed development access be provided via local streets, shared driveways and interconnected properties to maximize the efficiency of the Regional street system (as per the Regional Official Plan Policy 7.2.53), where appropriate.
4. To provide direct shared pedestrian/cycling facilities and connections from the proposed development to boundary roadways and adjacent developments to support active transportation and public transit, where appropriate. A drawing shall be provided

to show the layout of active transportation facilities and connections internal to the site and to the Regional roads.

5. Submit a detailed transportation demand management plan (TDM) to support active transportation and transit, and also to reduce the number of auto trips to/from the proposed development. The TDM Plan shall include but not limited to the following:
  - i. A check list that identifies the programs/measures, associated costs, the applicant's responsibility and specific actions to carry out the TDM implementation.
  - ii. Pedestrian and cycling facilities to encourage walking and cycling;
  - iii. Provide carefully planned, safe, illuminated and convenient pedestrian walkways and sidewalks linking the building to bus stops and transit stations/ terminals;
  - iv. Where appropriate, adequate signage for pedestrians, including directions to nearest transit stops and terminals;
  - v. High quality pedestrian amenities such as benches and garbage receptacles, where appropriate; and
  - vi. A TDM communication strategy, to assist the Region and the City of Vaughan to effectively deliver the Information Packages and pre-loaded PRESTO Cards to residents. This strategy shall also include a physical location for distribution of the Information Packages and pre-loaded PRESTO Cards.
6. The Owner shall submit a revised SWM report to the Region's satisfaction that:
  - Uses Regional parameters and Intensity Curves for all flows entering Islington Ave.
  - Explicitly quantify pre-development flows into Islington Ave
  - Demonstrate that post development flows into Islington Avenue will not exceed pre-development flows (it is not clear from the existing report that this the case)

### **Water and Wastewater Servicing Comments**

The Region did not receive a revised Functional Servicing Study for the current revised OPA application. For convenience purposes, Infrastructure Assessment Management's 2016 comments memorandum is appended to this letter.

### **Summary and Conclusions**

The proposed development for 530 apartment units in a 21-storey building is not supported by Regional staff. The proposal conflicts with the local and Regional planned urban structure, as the area is not planned for this level of intensification.

Development is severely constrained by natural heritage features. The property is within the Regional Greenland system and according to the TRCA, the primary access onto Islington Avenue is within the Humber River floodplain. There is a significant elevation change between Islington Avenue and the rear of the site, along Bruce Street. The proposed development would require cutting into the slope and removing a significant amount of trees and other vegetation.

The proposed emergency access to Bruce Street would require cutting into the slope, requiring substantial grading and slope stability mitigation. To accommodate the proposed level of development, Regional Transportation Planning staff are requiring the proposed emergency Bruce Street access to be converted to a permanent full moves intersection. From an environmental perspective, and from a traffic infiltration perspective, a full moves intersection on Bruce Street may not be desirable. The infrastructure improvements needed to accommodate the proposed level of development seem to outweigh any perceived benefit the proposed development may have.

Given the natural heritage features in the area and within the subject site, and since there are other more appropriate locations for planned intensification, Regional Planning staff do not support the approval of the proposed Official Plan Amendment application.

Please contact Augustine Ko, Senior Planner, at 1-877-464-9675 ext. 71524 or at [augustine.ko@york.ca](mailto:augustine.ko@york.ca) should you have any questions or require further assistance.

Sincerely,



Karen Whitney, M.C.I.P., R.P.P.  
Director of Community Planning and Development Services

c.c. Jackie Burkart, TRCA  
Quentin Hanchard, TRCA

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