



MEMBER'S RESOLUTION

Date:	January 11, 2011 – Committee of the Whole
Title:	REMOVAL OF THE URBAN BOUNDARY EXPANSION FOR RESIDENTIAL/COMMERCIAL FROM THE NEW OFFICIAL PLAN
Submitted by:	Regional Councillor Schulte

Whereas, the current removal of the Phasing Clause does not meet “Places to Grow” growth phasing requirements. The residential/commercial expansion is unnecessary to meet the provincial and regional requirements for population growth.

To help justify the expansion:

Six intensification area growth estimates were left as TBD in the population forecast studies.

Vaughan Metropolitan Centre density estimates were kept to the pre-subway Provincial “Places to Grow” requirement, much lower than would be expected at a subway station location.

Current OPA 600 greenland estimates were reduced.

White Belt lands (expansion lands) are rated some of the highest LEAR (Land Evaluation and Area Review) rated agricultural lands in York Region.

White Belt lands are riddled with Greenbelt lands and environmentally significant areas; home to at least one endangered species and many more threatened species, both flora and fauna.

The whitebelt land in Block 27 provide important wildlife and ecological linkage areas in the Don Watershed to the Oak Ridges Moraine.

Suburban development provides little or no financial benefit to the City, in fact it is often a cost burden, due to dispersed services.

Housing demand is undergoing a transformation in Vaughan due to our aging population downsizing and the high cost of single family homes.

AND THEREFORE BE IT RESOLVED that the Region of York be requested to modify the City of Vaughan Official Plan 2010 by deleting all reference to the New Community Areas in Blocks 41 & 27 as depicted on Schedule 13 entitled Land Use of the Plan and redesignating those areas as Agricultural.

Schedule 13-H entitled Land Use (Block 41), Schedule 13-I entitled Land Use (Block 27) be redesignated from New Community Areas to Agricultural.

That Schedule 1 Urban Structure be modified to redesignate these lands from Community Areas to Natural Areas and Countryside.

That Schedule 1A Urban Area be modified to redraw the Urban Boundary to remove Block 41 and 27 from the Urban Boundary and to designate them as Non-Urban Area.

And further that any policies related to the urban expansion of these referenced blocks be deleted from the Plan.

Respectfully submitted,

Regional Councillor Deb Schulte

Attachments

- 1 - Vaughan and York region Premature in Requesting Urban Boundary Expansion in Vaughan

Vaughan and York Region Premature in Requesting an Urban Boundary Expansion in Vaughan.

This report has been created by concerned citizens of Vaughan and provides proof that both the Region and the City of Vaughan are premature in requesting an urban boundary expansion in Vaughan, and any expansion now would be in conflict with the Places to Grow Growth Plan (Section 2.2.8.2).

After reviewing the market, the current applications for development and the consultants' conservative estimates for Vaughan's intensification areas, it is clear that **45% intensification is far below what will occur in Vaughan over the next 20 years**

The City and York Region have underestimated the intensification growth forecast and overestimated the number of single and semi detached housing units that are needed in Vaughan for the next 20 years, and because of this they are able to justify an urban boundary expansion.

In addition, the City has not conducted the necessary studies to show how an expansion will occur on prime farmland and ecologically sensitive headwater areas of the Don and East Humber. In fact, the full degree as to the ecological importance of this land has not been adequately studied or realized.

The following is a summary of how the proposed urban expansion contravenes the Places to Grow Plan. Please see the attached report for more details.

1) To align with York Region's Land Budget conclusions and justify an urban boundary expansion it was necessary for Vaughan to reduce its housing supply numbers. Six identified intensification area estimates within the existing built boundary are missing from intensification summary (Appendix 1 – Section A).

The expansion is not consistent with Growth Plan Section, 2.2.8.2 a) “a settlement area boundary expansion may only occur...where it has been demonstrated that – a) sufficient opportunities to accommodate forecasted growth ..., are not available.”

2) Intensification and Greenfield housing supply estimates have been reduced, claiming they will not be built by 2031 (Appendix 1 – Section B)).

The expansion is not consistent with Growth Plan Section 2.2.8.2 b) “the expansion makes available sufficient lands for a time horizon not exceeding 20 yrs.” and Section 2.2.8.2 c) “the timing of the expansion and the phasing of development within the designated Greenfield area will not adversely affect the achievement of the intensification target and density targets, and other policies of this Plan”.

3) The urban boundary expansion is based entirely on providing for a supply of ground related (single, semi and row) housing, not the complete communities required. Housing type estimates for Vaughan in its Official Plan are not consistent with York Region's Residential Demand Analysis, nor the requirement that "community lands in the Whitebelt areas are planned to achieve a density of 70 people and jobs per ha." York Region 2031 Land Budget -pg 23.

In the consultant report "Where and How to Grow -on pg. 73" Urban Strategies states- "The Provinces requirement for planning complete communities would also be met by using a density of 20 uph (70 people and jobs per ha). The compact land form associated with such density includes both residential and local commercial and retail, primarily on the ground floors of multi-story mixed-use buildings."

The expansion is not consistent with Places to Grow Section 1.2.2 Guiding Principals, nor Section 2.1 "This plan is about building complete communities, whether urban or rural. These are communities that are well-designed, offer transportation choices, accommodate people at all stages of life and have the right mix of housing, a good range of jobs, and easy access to stores and services to meet daily needs", as they are only accommodating ground related housing on the whitebelt lands.

4) Lands identified for residential expansion in Vaughan (Blocks 27 & 41) are fragmented by greenbelt lands and other natural heritage features. They are headwater areas of the Don and East Humber River and home to the endangered Red Side Dace, in addition to many threatened species (flora and fauna eg. Butternut). The east portion is also an important linkage area to the Oak Ridges Moraine from the Don. These areas have very high ecological value, are important wildlife habitat and provide an important linkage function. Development at the 70 persons and jobs per ha on this fragmented land, preserving the endangered red side dace habitat and ensuring the requirements of the Greenbelt must be demonstrated.

An urban boundary expansion is being proposed without any analysis of whether or not the proposed lands can accommodate development in an environmentally and financially sustainable manner. The expansion is being approved with justification to follow. In the spirit of the Places to Grow Act, we believe this process should be reversed.

Section 2.2.8.2 d) "where applicable, the proposed expansion will meet the requirements of the Greenbelt, Niagara Escarpment and Oak Ridges Moraine Conservation Plans"

Section 2.2.8.2 e) "the existing or planned infrastructure required to accommodate the proposed expansion can be provided in a financially and environmentally sustainable manner."

5) Agriculture is an existing use on these lands and a recently completed LEAR show that some of the highest rated agricultural lands in York Region are in the areas designated for urban expansion in Vaughan.

As there are alternatives to accommodate the growth this expansion is not consistent with Places to Grow Section 2.2.8.2f) “in prime agricultural areas: ii. There are no reasonable alternatives that avoid prime agricultural areas. and g) “impacts from expanding settlement areas on agricultural operations which are adjacent or close to the settlement areas are mitigated, nor Section 4.2.2.1 “will identify prime agricultural areas...and where appropriate, develop additional policies for their protection.

It is disappointing that both York Region and Vaughan are planning this urban boundary expansion in full knowledge that they are allowing for much more growth in Vaughan than has been allocated. The whitebelt land currently provides many services to the citizens that will be lost if it is utilized at this time for unnecessary housing. It may be necessary in the future to allow an urban boundary expansion, however to do one now would be premature and wasteful. The proposed urban boundary expansion runs counter to many of the guiding principles in PPS Section 2 – Wise Use and Management of Resources and Section 3 -Protecting Public Health and Safety, and should not be allowed to proceed at this time until a proper management plan is produced on how this area will be developed and will function within the context of the City, in a financially and environmentally sustainable manner.

Sincerely,

Deb Schulte – Co- Chair Friends of Boyd Park
Sony Rai – Sustainable Vaughan

Attached report contains the following sections:

Part 1 **A) Incomplete Housing Analysis used to Justify Urban Boundary Expansion**
B) Missing Ground Related Housing from Intensification Areas and Apartments from Greenfield Development
C) Apartments not Shown in White Belt
D) The Vaughan Official Plan does not Comply with the Places to Grow Act

Part 2 **A) York Regions Growth Goals Contravene the Places to Grow Act**
B) No Public Debate as to the Direction of Growth

Part 3 **A) York Region is forecasting the Wrong Housing Options**
B) Secondary Suites have not been identified in the Official Plan
C) Urban Growth Numbers for Vaughan Metropolitan Centre Require a Review
D) Actual High Density Housing Demand not properly considered by Hemson
E) High Density Housing Applications are already surpassing the Consultants forecast

Part 1:

A) Incomplete Housing Analysis used to Justify Urban Boundary Expansion

York Region has not identified that there are six intensification figures within Vaughan's built boundary not represented in Vaughan's Official Plan. In Table 2 of the Hemson report, "Housing Analysis and Employment Land Needs, Final Report" the consultant has left out housing numbers from; Weston and Highway 7, Bathurst and Centre Street south side, Vaughan Mills, Jane and Major Mackenzie Drive, Concord Go Station, and Dufferin and Centre Streets. These missing areas are some of the most significant areas for future growth in the City Vaughan.

These intensification areas have not been included in the final housing unit count for the Official Plan. By allowing six intensification figures to go unaccounted for, York Region has misrepresented its Official Plan's compliance with Vaughan's Official Plan. If the Region had revealed these missing numbers, the Province would have realized that the York Region Land Budget Forecast is flawed. There are already applications brought forward to the city for high density development in most of these areas. One of these applications (OP.08.005) at Highway 7 and Weston Road is proposing 1050 housing units. 1050 housing units are hidden from the public while an urban boundary expansion is being proposed.

Once the six missing intensification areas are accounted for, Vaughan will have growth that far exceeds what the Region has asked of it. Vaughan will may have 60% of all new growth in intensification areas, not the 44% Vaughan Council keeps misrepresenting to the media and to the public. The City may accommodate approximately 115% of the growth the Region has forecasted.

The Official Plan is in non compliance of Part 2.2.8 2 a) of the Act.

2.2.8 2a) sufficient opportunities to accommodate forecasted growth through intensification and in designated greenfield areas, using the intensification target and density targets, are not available:

Are we to believe no new housing will be built in these six areas in the next 20 years? According to the Hemson report, "For the purposes of this analysis, some of the unit potential for the major centres is not shown, since this is to be determined later through more detailed secondary planning." (Hemson Page 8) There are no secondary plans for the areas with missing numbers, nor have there been any secondary plans conducted as a part of the new official plan.

An urban boundary expansion is being suggested without a full tally of all new growth within the existing built boundary. The City of Vaughan is planning an urban boundary expansion by excluding entire areas of future population growth in the city. The City is prepared to sprawl first, and then it will provide the missing housing numbers at some later date. Making intensification areas subject to secondary plans to be determined at a later date does not mean these areas can simply be eliminated from the total growth numbers for the City. Unfortunately, this is exactly what has happened.

If the housing inventory numbers from the “Where and How to Grow report (Urban Strategies)” are used in place of the missing numbers we quickly see that in fact the City of Vaughan’s growth will far exceed the total population numbers allocated by the Region.

Hemson Report, “Housing Analysis and Employment Land Needs, Final Report” Table 2

Vaughan Metropolitan Centre	12,000	
<u>Major Centres</u>		
Yonge and Steeles Avenue	4,800	
Steeles Corridor	5,400	
Weston and Highway 7	tbd*	→ 1,050 (OP.08.005)
Bathurst and Centre Street North Side	1,350	
Bathurst and Centre Street South Side	tbd*	→ 1,847 (+ Promenade)
Vaughan Mills	tbd*	→ 8,820
Jane and Major Mackenzie Drive	tbd*	→ 2,033
	11,550	
<u>Local Centres</u>		
Kleinburg Core	80	
Woodbridge Core	900	
Maple Core	400	
Thornhill Core	150	
Concord GO Station	tbd*	→ 2427
Vellore Village Core	900	
	2,430	
<u>Primary Intensification Corridors</u>		
Highway 7	2,500	
Centre Street	400	
Dufferin and Centre Street	tbd*	→ 828
East of Dufferin	450	
Major Mackenzie Drive	600	
Rutherford Road	400	
Jane Street	100	
	4,450	
Total	30,430	+ 17,005 = 47,435

Source: Urban Strategies and Hemson Consulting, incorporating some Region of York and City of Vaughan data.

Notes: *to be determined through a secondary plan process.

SURPLUS

There is an exact figure of 9630 housing units that have been allocated for the white belt. An exact housing figure for *outside* the built boundary has been created without a total figure provided for *inside* the built boundary. By failing to provide all the housing numbers and types for intensification areas

Inside the built boundary, while at the same time justifying an urban boundary expansion, the City of Vaughan is contravening the intent of the Places to Grow Act.

B) Missing Ground Related Housing from Intensification Areas and Apartments from Greenfield Development

Hemson Report, "Housing Analysis and Employment Land Needs, Final Report" Table 6

Vaughan Housing Demand		Table 6
	Units	
Total units added 2006–31	66,180	
<u>Where will the new units be located?</u>		
Infill of remnant vacant lower density sites within built boundary	4%	2,320
Intensification units within the built boundary	44%	29,300
Units provided through greenfield development	<u>52%</u>	<u>34,560</u>
Total new unit growth	100%	<u>66,180</u>

Source: Region of York and Hemson Consulting Ltd.
 Note: Totals may not add due to rounding.

The Hemson report identifies a built boundary intensification capacity of 30,430 new housing units in the intensification areas it has included, however the number has been reduced to 29,300 when estimating housing demand. Infill development has been estimated at 3,400 units, however it has been reduced to 2,320 and the row house capacity has been ignored. A total of 31,620 from inside built boundary was identified.

Another 31 630 housing units can be built on greenfield land within the existing urban boundary, however it has been reduced to 24,930. Hemson concludes that only 24, 930 housing units in the Greenfield will be built by 2031, after removing 70% of the apartment units. The remaining 9630 units must be accommodated in the white belt (Hemson Table 7). The 9630 housing units are intended to be more traditional ground related housing units hopefully meeting the minimum density requirements allocated by the province.

Hemson Report, “Housing Analysis and Employment Land Needs, Final Report” Table 7

Table 7			
Greenfield Unit Demand and Supply Analysis 2006 to 2031			
	Ground Related Units	Apartment Units	Total Units
<u>How much potential supply is available?</u>			
Greenfield supply from Table 4	22,040	9,590	31,630
<u>How much of the supply can reasonably be expected to be built by 2031?</u>			
Share Supply built by 2031	100%	30%	79%
Units built by 2031	22,040	2,890	24,930
<u>How many units are needed on new urban land?</u>			
Greenfield demand	31,670	2,890	34,560
Less supply built by 2031	(22,040)	(2,890)	(24,930)
Units to be accommodated on new urban land	9,630	0	9,630

Source: Region of York and Hemson Consulting Ltd.

↑
HOUSING TO BE
ACCOMMODATED
ON THE WHITEBELT

The City claims that it must provide an adequate number of ground related housing units, because there is a stronger demand for this type of housing. Demand for ground related housing is not a justification for an urban boundary expansion in the Places to Grow Act.

By excluding the six intensification areas, the consultant has removed a significant proportion of ground related housing in the form of row houses from within the built boundary. Table 8 from the Hemson report identifies 3370 new row houses that are shown accommodated in the white belt. Row housing has been eliminated in the six missing intensification areas in the built boundary and has been added to the white belt.

Once the missing six intensification areas are included in the Official Plan, the city will have an abundance of ground related housing units in the form of row housing.

Hemson Report, "Housing Analysis and Employment Land Needs, Final Report" Table 8

Table 8				
All Housing Growth by Type, 2006–2031				
	Single & Semi	Row	Apt	Total
Inside Built Boundary,	2,320	6,720	22,580	31,620
Existing Greenfield	18,250	3,790	2,890	24,930
New Greenfield	6,260	3,370	0	9,630
Sub-Total	26,830	13,880	25,470	66,180
Share (%)	40.6%	20.9%	38.5%	100%

C) Apartments not Shown in White Belt

Only ground related housing is being proposed within the whitebelt. There are no apartments being indicated in the whitebelt in the City of Vaughan's Official Plan. York Region identifies a total of 870 apartment units in table 5 of The Land Budget Report from March 2010. By eliminating apartments, the City is creating more ground related housing than that identified by York Region. According to the Region's Official Plan the City is only required to accommodate 5220 singles and semis. The City is providing for 6260.

Table 5: York Region 2031 Whitebelt Area Unit Requirement by Structure Type and Local Municipality

	Single	Semi	Row	Apt.	Total
East Gwillimbury	3,680	740	2,210	740	7,360
Markham	6,070	1,210	3,640	1,210	12,140
Vaughan	4,350	870	2,610	870	8,700
York Region	14,100	2,820	8,460	2,820	28,200

Source: York Region Planning and Development Services Department, 2010

Note: Figures may not add due to rounding

D) The Vaughan Official Plan does not Comply with the Places to Grow Act

The City of Vaughan must provide the missing numbers in the six intensification areas and the Vaughan Metropolitan Centre before it adopts the Official Plan. The Official Plan exercise was intended to show how the city is expected to meet its growth obligations over the next twenty years. In excluding the six intensification areas, the city has not completed the official plan exercise. This Official Plan must not be approved by the Region and with an incomplete plan the City and York Region must not be allowed to expand the urban boundary.

It is imperative that a delay on an urban boundary expansion be implemented in order to allow the secondary plans referred to in the Hemson report be completed, establishing the true housing numbers within Vaughan over the next 20 years. Citizens of Vaughan deserve to have a completed Official Plan.

The Citizens of Vaughan have not been allowed to explore the options that would have provided these alternatives. Instead, we will be a city that will far exceed the 45% intensification within the built boundary while also expanding beyond our current built boundary.

Part 2:

A) York Regions Growth Goals Contravene the Places to Grow Act

York Region prematurely explored an urban boundary expansion in 2008 long before any analysis of whether this expansion was required or not. York Region's desire for an urban boundary expansion contradicts the very spirit of the Places to Grow Act.

The region hopes to use development on White belt lands to help pay down its debt. York region is on the hook for one billion dollars due to the York-Durham Sanitary Sewer Southeast Collector, more commonly referred to as "The Big Pipe". This is the large infrastructure project that will connect York and Durham's sanitary systems. Due to infrastructure projects that promote urban sprawl such as the Big Pipe, York Region is carrying the highest per capita debt in the GTA. York Region doesn't seem particularly worried about the debt as they had a plan to dig themselves out of this hole as far back 2008. York Region's entire debt financing model is based on recuperating costs through development fees.

The Provinces Places to grow act is forcing municipalities to grow in a more compact way, focusing a minimum of 40% of new growth within existing urban boundaries. This will create higher density housing in the form of town homes and apartments. The region will receive an influx of development levies due of this type of development. The region also hopes to collect levies on traditional ground related housing. Development fees collected on a combination of single family home subdivisions, town homes and condos will help the region keep a continuous cash flow if there is a market down turn in one type of housing versus the other. York Region wants to expand the urban boundary in Markham, East Gwillimbury and Vaughan to increase land available for development. The more land available, the more development levies. In fact, the region estimates it will recuperate \$6.4 billion dollars through development charges.

The Region itself has made this the centre piece of its desire to expand the urban boundary. Report No. 2 of the Planning and Economic Development Committee Regional Council Meeting of March 25, 2010 (P. 9) states,

"There is a level of risk based on the forecast and land budget assumptions, related to development charges revenue stream. An urban area expansion is required to accommodate demand for the ground-related housing market. The forecast for high density units will require a significant shift in housing preferences for the Region's residents. A lower than anticipated growth rate for either the ground-related housing market or the high density housing market will result in a shortfall of projected development charges revenue. **This will cause delays in capital cost recovery, impact costs for debt repayment and result in a potential deferral of elements in the capital Report No. 2 of the Planning and Economic Development Committee program.**"

B) No Public Debate as to the Direction of Growth

The two main consultants responsible for the creation of the Official Plan, Urban Strategies and Hemson, have both concluded that an urban boundary expansion is avoidable and that the city has a choice as to which direction it wishes to grow.

Urban strategies, How and Where to Grow (page 81)

“The existing urban area can therefore accommodate a minimum of 90% of the forecast housing demand to 2031.

The remaining 10% (6 350 units) of the forecast demand can be met through:

- additional intensification within the built boundary;
- additional development in the designated Greenfield;
- an urban boundary expansion; or
- a combination of some or all of the above”

Hemson, Housing Analysis and Employment Land Needs Final Report (Page 5)

“As set out in that background work, the City of Vaughan has considerable potential to accommodate residential growth through intensification. With significant intensification, approximately 85% of the City’s forecast housing demand to 2031 can be accommodated within the existing urban area. The remaining 15% could be met through:

- additional intensification within the built boundary;
- additional development within the designated Greenfield area;
- an urban boundary expansion; or
- a combination of some or all of the above.”

The Town of Markham had an open, public debate about the future of its white belt lands, allowing politicians, citizens, and the media to discuss that city’s future. The politicians in Vaughan decided to forgo such a democratic process and instead have proposed an urban boundary expansion with no studies, public engagement or debate about such an important issue. Why are two cities within the same region allowed to deal with this sensitive issue so differently?

The City has gone on record as saying that they did have a very engaged public process. This is true, up until they proposed an urban boundary expansion. This is when the doors became shut to the public. There was no public involvement on the decision to open the white belt lands for development. The only time the issue did arise in the media was when Sustainable Vaughan became engaged. Vaughan

citizens have been denied the opportunity to discuss two of the options made available by the consultants, expanding the urban boundary or increased intensification within the existing boundary.

Part 3:

A) York Region is forecasting the Wrong Housing Options

The City of Vaughan's Social Services Report states, "With housing costs rising, income not keeping pace and a lack of diversity in housing choices, the ability of Vaughan residents to purchase a home is diminishing. In addition to rising housing costs, almost a third of Vaughan's residents are spending more than a third of their income on housing. The proportion of people spending more than 30 percent of their income on housing, an important measure of affordability, is 27.5 percent in Vaughan".

According to Real Estate Vaughan (<http://www.realestatevaughan.ca/>), the average cost of a single family detached house selling in Vaughan for the month of June was \$642 791. The average cost of a semi detached home on sale that same month was \$419 143. These are not affordable options. Town homes sold for an average of \$381 565, less expensive but hardly a bargain.

York Region's forecast for housing typology is wrong for Vaughan. The Region's forecast calls on Vaughan to add 60 180 housing units. Of this total, the Region wants Vaughan to allocate 40% of this for single and semi detached family homes, and 44% to apartments. Only 17% of all new growth in Vaughan for the next 20 years will be row housing. The most affordable ground related housing option will be the least available housing typology in the next 20 years.

Hemson states in its housing report,

"One of the advantages that the City of Vaughan has in this regard is the potential for a relatively large supply of row house units, which are somewhat better suited for families than apartment units. Any opportunities for intensification that are based on row housing rather than apartments are more likely to be successful in the marketplace in the near term and, therefore, more likely to contribute to the desired outcomes for the long-term planning of the City."

85% of the city's current housing stock is of the unaffordable type, single family homes. Yet York Region is planning for 40% of new growth to be more of the same. It is not single and semi detached homes that should comprise 40% of housing types. 40% of new growth should be comprised of row housing.

The 5220 single and semi detached housing units the region has allocated for the White belt should instead be row housing units in the intensification areas. Vaughan has ample room to find a place for these units because the Official Plan is missing six intensification areas yet to be allocated housing unit totals. This is why there is an urban boundary expansion. The Region has allocated too high a number of single and semi detached homes and has allocated too low a number of town houses and apartments.

Urban Strategies has stated in "Where and How to Grow- June 2009- pg. 72"- "It has been shown in Section 4.2 above that there is an oversupply of capacity for residential intensification within Vaughan's built boundary. This extensive supply of underutilized lands also means that there is the opportunity for

large portions of it to be developed with grade-related housing forms such as townhouses and stacked townhouses, in addition to the expected apartment-style forms.” This analysis was ignored in subsequent reports as it did not support York Region’s demand for an urban boundary expansion.

If York Region is looking to recuperate costs through a mix of ground related and apartment units, why has it created such a low forecast of row housing? Increasing the number of row housing will undermine the regions plans for an urban boundary expansion. A high forecast of single and semi detached housing is needed to push the case for an boundary expansion.

B) Secondary Suites have not been identified in the Official Plan.

Vaughan council has created a Secondary Suites Task Force to look at the potential of allowing secondary suites within the City. Secondary suites, such as basement apartments are currently illegal in the city.

Vaughan itself recognizes the need for Secondary Suites as a part of its affordable housing policy. This type of approach takes pressure off the city to create and regulate affordable housing. “A recent York Region study found that more than 3,400 households are waiting on housing geared toward low-income families. About 10 per cent of our population is living in poverty, particularly in Woodbridge, Maple and Thornhill, and there are 7,000 single-parent families in Vaughan.” The fact that secondary suites already exist but are not regulated for safety is another factor that has lead to the creation of this study.

It is hard to imagine the City of Vaughan continuing with its policy of banning secondary suites over the next twenty years. The City will need to accept this reality as it grows to become more urban. Secondary suites will be a reality in Vaughan before 2031. What needs to be discussed is how many units of housing secondary suites will be able to create.

A five year moratorium on an urban boundary expansion will allow the City’s Secondary Suites Task force to conclude its work and potentially move forward with legalizing and regulating secondary suites. The potential number of secondary suites available should be included in the total Vaughan housing count.

C) Urban Growth Numbers for Vaughan Metropolitan Centre Require a Review

The Places to Grow Act identifies 25 Urban Growth Centres (UGCs) as strategic focal points for growth and intensification. The Vaughan Metropolitan Centre (VMC) is among them. “UGCs will be planned as focal areas for investment in institutional and region-wide public services, as well as commercial, recreational, cultural and entertainment uses.” UGCs like the VMC have been assigned a growth target of 200 people and jobs per hectare by 2031. The density requirement allocated by the Province for the VMC is too low.

The VMC will have both a new subway stop connecting Vaughan to Toronto and a rapid transit line connected Vaughan across York Region. There has been no growth forecast conducted for the Vaughan Official Plan which identifies the effects this type public transit infrastructure will have on high density demand and development.

According to the Places to Grow Act, the VMC is to have identical density targets as downtown Milton, Kitchener and Pickering. Vaughan's downtown and Milton's downtown have nothing in common. The problem with the Urban Growth Centre category is that there is no proper designation for a Growth Centre which borders Toronto and which also shares major public transit infrastructure connected to that city. The VMC must not be treated the same as UGCs an hour outside of Toronto.

The Places to Grow Act was established in 2006 and the Spadina Line Subway extension was not official during the creation of the Act. The official announcement and funding guarantees for the subway extension were established after the release of the Places to Grow Act. Therefore, the creation of the VMC UGC was not properly considered in the context of the Places to Grow act. A second review of the density targets is warranted.

The VMC must accommodate 200 people and jobs per hectare by 2031 equalling 25000 people and 12 000 housing units over an area of 179 hectares. This density results in 69 housing units per hectare. A density of 77 housing units per hectare will create a neighbourhood of four storey row houses. This is hardly the bustling metropolis the city of Vaughan is promoting to its citizens. This density is more appropriate in a city such as Milton.

In reality the VMC should be allocated with the same density targets as The Etobicoke Centre, 400 people and jobs per hectare. Both the VMC and the Etobicoke Centre are suburban areas with subways (Vaughan by 2017). Etobicoke is the low-rise suburb to the west of Toronto, just as Vaughan is the low-rise suburb immediately north of Toronto. Both are also located close to major highways and employment lands and both are equal distance to the airport. The Etobicoke Centre has a targeted density of 400 people and jobs per hectare, while Vaughan is allocated with half this number. The VMC will be a major regional hub while also being connected to the city of Toronto, making it very unique as an Urban Growth Centre. In fact the VMC has greater potential to develop denser than the Etobicoke Centre due to the fact that it is not surrounded by single family suburban homes as the Etobicoke Center is north and south of Bloor.

The VMC UGC density must be changed. In analyzing two existing development applications for high density development inside the VMC (Al Palladini - OP.08.005 & Royal Empress Gardens - OP.06.019 see appendix), 2985 housing units are already being proposed six years before the introduction of the subway.

With this type of development demand a five year moratorium on development in the white belt will allow the province time to assess whether it is realistic to keep the Urban Growth number for Vaughan equal to that of Milton, Kitchener and Pickering.

D) Actual High Density Housing Demand not properly considered by Hemson

In an analysis of existing applications for high density housing applications within the City of Vaughan, post 2006 it was established that the Vaughan Mills Centre, north of the VMC is already anticipated to be denser than Vaughan's future downtown.

The analysis discovered that the Vaughan Mills Centre will become far denser than the Vaughan Metropolitan Centre. The real downtown of the city will be located around a shopping mall and not the subway station. The city's own study of high-rise applications from the 2007 document "Jane Street Corridor, Residential Potential Land Use Review" was used to prove this fact. This study takes existing applications for high-rise developments into account. These are not minimum numbers such as those used by the consultants. These are real applications by real developers recognizing a real demand in the market for high density housing. What these numbers show is that the density of the Vaughan Mills Centre will far exceed that of the City's "downtown".

This analysis was conducted to show the type of density the development industry recognizes as viable within Vaughan. The willingness of developers to engage in these types of projects speaks about the demand and willingness buyers have. Bringing a development application forward to the city requires a great deal of funding commitments, work by consultants and analysis of market conditions. These applications are not brought forward on a whim.

Based on the applications in the report there are 6880 high density housing units on 18 hectares of land resulting in a density of 381 housing units per hectare. If we double the land area to accommodate for roads and open spaces we have a density of 191 housing units per hectare. If we double the land area again to accommodate for civic and institutional uses the result is a density of 95 housing units per hectare. The Vaughan Metropolitan Centre, based on the consultant's numbers gives us a density of 67 housing units per hectare. According to Urban Growth Centre numbers, The Vaughan Mills Centre will be denser than the Vaughan Metro Centre.

VAUGHAN HIGH DENSITY DEVELOPMENTS

Applications already submitted to the city

JANE AND RUTHERFORD				
PROPERTY	Application File Number	Land Area (hectares)	Number of Dwelling Units Proposed	Units/Hectare
Delisle	OP.05.005	5.77	1730	300
Tesmar	OP.05.020	1.67	600	359
Casertano/Mammone	OP.07.001 OP.09006	6.98	3650	523
Solmar	OPA 626	3.604	900	250
Total		18.024	6880	381.71

Land Area Doubled		36		191.11
Doubled Again		72		95.56

VAUGHAN METROPOLITAN CENTRE				
PROPERTY		Land Area (Hectares)	Number of Dwelling Units Proposed	Units/Hectare
		179	12000	67

What is significant about the Vaughan Mills Centre is that it has been identified by Metrolinx as a “destination”. Destinations such as Vaughan Mills are “critical to the functioning of the transportation system” (Metrolinx Backgrounder page 3). Vaughan Mills is a very important piece of Metrolinx’s transit strategy for Vaughan and an area with increasing development demand. There is no reasonable justification for leaving this area out from the Secondary Plans.

E) High Density Housing Applications are already surpassing the Consultants forecast

The demand for high density housing in Vaughan is already far higher than what Hemson are allowing in the official plan. The City itself prepared a document looking at potential medium and high density developments in Vaughan between 2006 and 2007. The total of potential development equals a whopping 11 114 housing units.

Much of the justification provided by the consultants verbally is that they don’t expect the high density growth in the VMC to happen in 20 years. In fact, Hemson believes only 27,400 high density housing units will become a reality by 2031. If we take the 6880 units in various stages in application from the Jane Street Corridor Study and add them to the applications at Weston Road and Highway 7, and the

Royal Empress Gardens development, there is a total of 9865 apartment units in existing applications. More than a third of the consultants forecasted high density numbers are potentially a reality seven years before the introduction of the subway line.

Hemson's analysis is surprising when you look at the Hemson Report from October 2008 "Vaughan Development Charges Final Report" In this document, Hemson states "Growth in rows and other multiples and in apartments has been particularly strong over the last 10 years growing by 200 per cent and 125 per cent respectively." (page. 44) This statement contradicts the Housing Analysis and Employment Land Needs Report where Hemson states "The key challenge to achieving intensification objectives...is to encourage a significant shift towards apartment units, one that the market on its own is unlikely to deliver." (Hemson P. 58)