

COMMITTEE OF THE WHOLE – OCTOBER 19, 2009

COMMENTS ON THE DRAFT YORK REGION OFFICIAL PLAN (JUNE 2009)

FILE #9.6.34

Recommendation

The Commissioner of Planning recommends:

1. THAT Council endorse the comments contained in this report regarding the Draft York Region Official Plan – June 2009 and that they be forwarded to the Region;
2. THAT the comments attached Appendix 1, be forwarded to Regional staff for discussion and clarification;
3. THAT once the Region has made the modifications to the Regional Official Plan, that it be circulated to municipalities for review and comment prior to final adoption; and
4. THAT reconciliation of both the City and Regional Official Plans may be required once the City's new draft Official Plan process has been completed.

Contribution to Sustainability

The Region's draft Official Plan integrates sustainability objectives including preservation and enhancement of the natural environment, economic vitality and healthy communities.

Major elements of the Region's draft Official plan include:

- Protection and enhancement of key natural heritage features and development of a natural heritage system;
- Innovative policies to promote water and energy efficiency and reduction in demand for services reflecting best practices such as LEED standards;
- Support of high-density, mixed land use in key development areas throughout the Region;
- Requirement for a mix and range of housing types and tenureship;
- Promotion of healthy, active lifestyles in community design;
- Identification and protection of employment lands and promotion of green clusters, tourism and knowledge based industries;
- Phasing of new community development to support the growth management strategy; and
- Policies supportive of agriculture and local food production.

Economic Impact

There are no immediate economic impacts resulting from the adoption of the report. Although the implementation of some of the Regional policies may have financial implications for the City, further discussion is required to understand this potential impact.

Communications Plan

This report will be available to the public through the City's Committee of Whole and Council public process in addition to the Region's Committee and Council public process.

Purpose

The purpose of this report is to provide an update on the Draft York Region Official Plan (ROP) released June 22, 2009 and to obtain Council endorsement of the Staff comments pertaining to the Draft Regional Official Plan for submission to York Region.

Background - Analysis and Options

The Region's Draft Official Plan was presented by the Regional Director of Long Range and Strategic Planning to Committee of the Whole (Working Session) on September 15, 2009. It was recommended by the Committee that Section 3.5.22 contained in the York Region Official Plan draft document, dated June 2009, be amended to read as follows:

- *Section 3.5 Housing Our Residents*
22. That local municipalities shall **consider** including "as-of-right" secondary suite policies, on a municipal-wide basis, in local official plans and zoning by-laws; and

That the following be approved:

- *Whereas there are significant environmental constraints within the shown East West Economic Corridor; and*
- *Whereas there is a significant existing residential and planned residential development within the shown East West Economic Corridor;*
- *MOVE that the Regional Municipality of York, Ministry of Transportation, Ministry of Municipal Affairs and Housing, Ministry of the Environment and Metrolinx be requested to show the GTA East West Economic Corridor north of Kirby Road from west of Concession 10 to Highway 400 in Vaughan.*

York Region's Draft Official Plan (ROP) is the result of the Region's "Planning for Tomorrow" growth management initiative that began in 2005. The Region has completed a series of reports in support of growth management. The reports include:

- Comparative Analysis of Growth Scenarios (April 2008)
- Visualizing the Look of Intensification in York Region: Preliminary Report (June 2008)
- Planning for Tomorrow – Refined York Region 2031 Forecast and Land Budget (September 2008)
- York Region 2031 Land Budget (January 2009)
- York Region 2031 Population and Employment Forecasts (January 2009)

It is anticipated that when the new Region of York Official Plan is approved, it will conform to Provincial Policy including Places to Grow – the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Provincial Policy Statement (2005). It is intended that Regional Council will adopt the new Regional Official Plan later in the fall of 2009.

The main policy objectives contained in the Region of York Official Plan continue to focus on sustainability as the basis for planning communities and are as follows:

- **Sustainable Natural Environment**
 - Improvements and enhancement of the Regional Greenlands System;
 - Policies that require urban development and infrastructure projects to contribute to Greenlands System enhancements.

- **Healthy Communities**
 - Provisions to include secondary suites "as-of-right";
 - Region-wide Archaeological Resources Master Plan;
 - Require a minimum of 25% of new housing units to be "affordable", 35% of new housing units to be located within Regional Centres and Corridors within each local municipality.

- **Economic Vitality**
 - Protection of Regionally designated "Strategic Employment Lands";
 - Promotion of green clusters, tourism and knowledge-based industries;
 - Integration of retail into community design via Region-based urban design guidelines.

- **Agricultural and Rural Areas**
 - Agricultural and Rural designation based on updated Land Evaluation Criteria Review (LEAR);
 - Updated Regional policies/mapping ensuring conformity to Oak Ridges Moraine and Greenbelt Plans.

- **Building Cities and Complete Communities**
 - Local municipalities are required to prepare intensification strategies meeting/exceeding a minimum of 40% within the Region's built-up area;
 - Requirement for local municipalities to meet (i.e. shall) Regional intensification targets as set out in the Draft Official Plan. (According to the Draft Regional Official Plan, Vaughan has a required target of 29,300 units between 2006-2031.);
 - Required sustainability criteria for new communities focusing on minimum targets reflecting best practices in green building standards;
 - Requirement for Community Energy Plans;
 - Target of 70 people and jobs/ha for New Community Areas; target of 2.5 FSI for Centres and Corridors; and, 3.5 FSI at major subway stations;
 - Other criteria requirements for water management, mobility systems, public spaces, mixed-uses and urban design;
 - Proposed Draft Official Plan growth projections for the City of Vaughan as shown below.

City of Vaughan – Growth Forecasts – Region of York Draft Official Plan – June 2009						
Table 1						
Year	2006	2011	2016	2021	2026	2031
Population	248,800	294,200	329,100	360,600	389,700	418,800
Employment	162,200	193,700	226,000	248,900	257,600	266,100

- **Servicing Population / Infrastructure**

- Urban area modal split target of 30% and 50% in Regional Centres and Corridors;
- Focus on active transportation (walking, cycling and transit);
- Reduced demand for services (i.e. water use);
- Identification of 400 series highway interchanges and flyovers;
- Increased standards (Region-wide) for new development focused on efficiency of energy and water;
- Policies for Wellhead and Intake protection.

Discussion and Analysis

The City appreciates the opportunity to comment on a progressive and forward thinking document and applauds them for introducing innovative policies to attain sustainable development across the Region. The approach is a platform from which the City has and can continue the development of its new Official Plan and other master plans.

The *Planning Act*, requires that the City's new Official Plan conform to the Regional Official Plan (ROP) and therefore, staff's review of the draft Regional Official Plan is focused mainly on potential key issues that may have an impact on the City of Vaughan's jurisdiction, Growth Management Strategy and new Official Plan.

Major Comments

As part of the circulation process, a copy of the Draft Region Official Plan document was forwarded to the following departments: Policy Planning; Development Planning; Transportation / Engineering; Economic Development; Finance; and, the City Manager's Office. This report is a compendium of comments received as a result of the circulation. Transportation and Engineering Department reported separately on the Draft Regional Official Plan. Key issues are discussed below; please refer to Appendix 1 (Attachment 1) for additional policy-specific comments.

The City's Growth Management Strategy is now well underway. This process includes preparation of a new City-wide Official Plan to provide an up-to-date policy framework to guide decision-making to 2031 and address all Provincial and Regional planning requirements. In addition to the Official Plan, the process includes completion of a wide array of other studies and master plans addressing or touching on many of the issues addressed by the Region's Official Plan. These include: long term population, housing and employment forecasts; urban land requirements; development of the Vaughan Metropolitan Centre; natural environment and systems; sustainable development; economic development; cultural planning; housing affordability; commercial development; natural and built heritage and archaeology; and transportation and servicing. Most of the City's work in these areas is still in progress and the results will be made public in the coming months. To ensure consistency and compatibility between the ROP and the City's emerging policy framework, the City and Region should resolve to continue to work together to address any outstanding issues to their mutual benefit.

Jurisdictional Issues

The comments below pertain to policies in the Draft Regional Official Plan that appear to be more prescriptive and have the potential to infringe upon Vaughan's municipal jurisdiction. Regional policies should be respectful of local municipal jurisdiction as outlined below.

Draft ROP Policies and Comments

Policy 2.1.4 (Page 6) requires local municipalities to *"develop local greenlands systems that identify enhancement areas and linkage opportunities and include policies, initiatives, and mapping that protect and complement the Regional Greenlands System"*.

Policy 2.2.44 (Page 18) – requires landform conservation through local site alteration by-laws. By-laws and other mechanisms for soil protection and landform conservation are also a recommendation of Vaughan's Urban Forest Strategy. Parks and Forestry staff will collaborate with Policy Planning staff to develop the By-law or other soil protection and topography conservation measures.

Policy 3.1.3 (Page 24) - The draft ROP requires *"high-quality urban design and pedestrian-friendly communities that provide safety, comfort and mobility so that residents can walk to meet their daily needs"*. Although this is encouraged and supported, the way the policy is written would suggest that the Region has jurisdiction over urban design and has a say in what would constitute "high quality urban design", when this is a local municipal jurisdiction.

Policy 3.5.23 (Page 30) - *"To prohibit the approval of local municipal official plan and zoning bylaw amendments that would have the effect of reducing the density of a site in areas that have been approved for medium- or high-density development."* The draft ROP includes a policy that has the effect of prohibiting the approval of local OP's and zoning by-laws that propose to reduce the density of a site in areas that have been approved for medium or high density development. This policy should be discouraged as over time a more appropriate different use may be identified for an area, and accordingly, each OP or zoning by-law amendment should be considered on its own merit by the local municipality.

Policy 4. 5.14 (Page 37) requires local municipalities to complete an *"economic/fiscal impact analysis for secondary plans, comprehensive plans and any other significant proposal, as determined by Council. The analysis shall be co-coordinated between the Region and local municipalities, boards and agencies and shall include but not be limited to: a) an assessment of Regional service costs; b) impacts on operating and capital budgets; and, c) the assessment of ability to financially and technically provide for required servicing infrastructure in order to allow the development to proceed on a timely basis."*

Further discussion with the Region is required to understand the implications of this policy from a municipal perspective. Depending on the outcome of that discussion, "To ensure" may be more appropriate than "To require".

Policy 5.1.8. (Page 41) Requires *"within each local municipality, that a phase of new community area development is substantially complete (i.e., generally 75% of building permits have been issued) before a subsequent phase may be registered, to ensure the orderly development of land", and;* Policy 5.1.9. (Page 42) requires *"local municipalities to prepare detailed sequencing plans within each secondary plan that are supported by water, wastewater, and transportation infrastructure, and the provision of human services."*

The City's new Official Plan will determine and ensure the orderly development of land, but may have different requirements than this proposed policy, based on local municipal requirements and conditions.

Policy 5.2.10 (Page 44) – *"That secondary plans and zoning by-laws shall, in consultation with the Region and related agencies, incorporate parking management policies and standards that include: b. shared parking requirements, where possible, reflecting variances in parking demand between complementary uses on a time-of-day, weekday/weekend, and monthly basis; c. site design that orients the main building entrance(s) towards the street(s), and that does not permit the placement of surface parking spaces between the main building entrance and the major street..."*

The wording of the policy should be written in more general terms (i.e. the Region encourages, promotes, etc) to reflect the local nature of such detailed standards.

Policy 5.2.13 (Page 44) requires that development *shall* be designed to maximize solar gains and be constructed in a manner that facilitates future solar gains.

Although this is a positive policy, the wording should be written in more general terms (i.e. the Region encourages, promotes, etc).

Policy 5.4.6 k (Page 49) includes a policy that encourages the inclusion of public art in all significant private sector developments and that requires the dedication of 1% of the capital budget of all "major" municipal buildings to public art.

It should be up to each municipality to determine the details of their public art policy.

Policy 5.4.7. (Page 49) Requires that secondary plans and zoning by-laws *"shall, in consultation with the Region and related agencies, incorporate parking management policies and standards that include: a) reduced minimum and maximum parking requirements, b) shared parking requirements, c) site design that orients the main building entrance(s) towards the street(s), and that does not permit the placement of surface parking spaces between the main building entrance and the major street"*.

These are matters of local planning and design. The City is completing a detailed parking standards study in consultation with the Region, to guide City parking policy.

Policy 5.4.15 (Page 50/51) - *requires* local municipalities to provide community benefits (i.e. transit station improvements, social housing, pedestrian connections, Regional community health facilities, Regional emergency medical services / police stations, etc.) in Regional Centres and Corridors in local Official Plan and Zoning By-law in exchange for additional height and density.

The list of community benefits achieved through the use of Section 37 of the *Planning Act* should be determined by the local municipality in consultation with the Region.

Policy 7.1.9 (Page 78) requires that new institutional, commercial and industrial development proposals provide preferential carpool parking and bicycle storage facilities.

These details should be left to the municipality to decide rather than the Region. The wording should be written in more general terms (i.e. the Region encourages, promotes, etc).

Policy 7.4.10 (Page 95) is a policy to work with local municipalities to require existing multi-unit residential buildings to participate in three-stream waste collection.

The City is currently requiring all new development to include three-stream waste collection, however, it may be difficult to force existing multi-unit buildings to renovate their buildings to do this. This is particularly the case since the *Environmental Protection Act* currently does not require three-stream waste collection (only two-stream). The wording should be written in more general terms (i.e. the Region encourages, promotes, etc).

General Comments

The location, of buildings, parking, design of sites should remain within the jurisdiction of the municipality as well as the contents of zoning by-laws, urban design guidelines and parking standards. The City supports the intent of the policies in principle; however these policies appear to be prescriptive. It is requested that the Region modify its draft document by replacing words such as "shall require, introduce, implement", or other words having a similar effect, in favour of such general terms as "promote, encourage", etc. where appropriate. The document also requires the use of TOD (Transit Oriented Development Guidelines) as policy guidelines to promote

sustainable development for transit and other sustainable modes; however, this should not infringe upon Vaughan's ability to design and approve site plans in a manner that the City determines to be appropriate in consideration of the local community context and where the design does not infringe upon Regional jurisdiction.

In order to clarify the overall Regional intent of its Official Plan policies, it is also suggested that the wording be noted in Section 1.4 – Purpose and Organization (Page 3) of the document to include a clause that speaks to the following:

“The policies in this plan, except where specified otherwise, apply to matters of Regional responsibility and concerns.”

Affordable Housing

Policies

Policy 3.5.6 and 3.5.7 (Page 29) requires that a minimum 25% of new housing units across the Region be *affordable*, and distributed within each local municipality; and a minimum 35% of new housing units in Regional Centres and Regional Corridors be *affordable*, offering a range of affordability for moderate income households.

Policy 5.4.6. e) (Page 48) states that *“it is the policy of Regional Council that comprehensive secondary plans for the Regional Centres and Corridors be prepared by local municipalities and implemented in cooperation with the Region and related agencies”*. All secondary plans are *shall* include *“a minimum requirement of 35% affordable new housing units that includes a range of compact housing forms and tenures, and intrinsically affordable units;”*

Comment

The draft ROP includes the requirement for a minimum of 25% affordable new housing units to be provided across the Region; and that a minimum 35% of new housing units in Regional Centres and Regional Corridors be affordable (Policies 3.5.6, 3.5.7, 5.4.6 e). The City is currently studying the issue of housing affordability and will be coming forward with a strategy and policies to achieve greater housing affordability in Vaughan. Therefore, the wording should be written in more general terms (i.e. the Region encourages, promotes, etc). The City agrees with the principle of identifying targets, however, further discussion needs to occur between the Region and the City regarding the implications of the Region's draft policies and the tools that would ensure delivery.

Regional Centres / Corridors & Intensification

Policies

Policy 5.4.20 e) (Page 52) states that the planning and implementation of Regional Centres *will* provide a resident-to-employee target ratio of 1:1.

Policy 5.4.23 a) and b) (Page 52) states that that the Regional Centres contain the *“highest development densities and greatest mix of uses in the Region, and shall achieve a minimum density of: a. 2.5 floor space index per development block. This requirement meets and exceeds the Places to Grow: Growth Plan for the Greater Golden Horseshoe gross minimum density requirement of 200 residents and jobs combined per hectare; and, b. 3.5 floor space index per development block, at, and adjacent to, the Vaughan Corporate Centre Station on the Spadina Subway Extension, and the Langstaff/Longbridge and Richmond Hill Centre Stations on the Yonge Subway Extension.”*

Comment

Staff think the target ratio of 1:1 is unrealistic for the Vaughan Metropolitan Centre. The Vaughan Metropolitan Centre (VMC) Focused Area Study currently being undertaken by the City, show 2031 targets for the VMC at a ratio of 2:1, which is fairly aggressive at this time.

The draft ROP calls for a minimum density of 2.5 FSI per development block. It is suggested that the Region not prescribe minimum and maximum densities, but instead, let area municipalities determine them through the studies now underway. The Region's background paper shows, 2.5 FSI across a centre. This will put the VMC well over the permitted Urban Growth Centre target, and the City thinks it is too aggressive. Many of the blocks in the VMC will have a minimum 2.5 FSI requirement, however, there may be lesser FSI minimums along the perimeter of the VMC, where the minimum is more likely to be 1.5 FSI to ensure a proper transition gradient at the interface of the VMC boundary and lands beyond. The City agrees with the minimum requirement of 3.5 FSI on blocks adjacent to the proposed subway station, however, there needs to be an exception for public facilities such as parks, institutions and bus terminals.

The Draft ROP sets forth broad principles, goals and objectives for intensification focused around centres and corridors however, a greater coordination between these broad policy statements and other policies and objectives in the Draft ROP is needed. In order for intensification to work from an urban design and planning standpoint, policies for the creation of compact centres, corridors and other areas of intensification should be coordinated more clearly with other policies. These include: policies that support the creation of public squares within centres and corridors; policies that locate major public facilities within intensification areas; and, policies for contextually-based parking standards that promote underground and structured parking in intensification areas as well, policies that restrict automobile-oriented land uses such as drive-throughs within centres and corridors.

Sustainable Development and LEED Standards

Policies

Policy 5.2.17 (Page 44), 5.4.9 (Page 50), and 5.6.12 (Page 57) states "*that all new mid- and high-rise residential, mixed-use, major office, commercial and institutional development shall be built to a minimum: a) LEED® Silver, prior to and including 2015; b) LEED® Gold, 2016 up to and including 2021; and, c) LEED® Platinum, post-2021. Based on the applicable LEED® rating system or alternative equivalent.*"

Comment

LEED is likely to change standards over time as building codes are improved since LEED is intended to recognize higher performance in the development industry. Hence, LEED Silver in 2020 will likely be more rigorous than LEED Silver today.

Determining an "alternative equivalent" will require further work and discussion. For example, a LEED Accredited Professional may be reluctant to rate an "alternative equivalent" as it could diminish the LEED brand. Hence, rather than specifying LEED standards, it would be useful for York Region and local municipalities to agree on a set of performance standards that are cross-referenced to LEED and other certification systems (i.e. Green Globes, GreenHouse, One Planet Living). A certain baseline performance standard can be required while still allowing for industry leaders to be recognized by independent, third-party certification systems.

City of Vaughan Council has committed to developing a framework to recognize sustainability performance of development applications. The City is aware similar initiatives elsewhere in York Region. As a result, the development of a framework, such as a sustainability checklist, to recognize improved sustainability performance above regulatory requirements is recommended. Such a framework can be cross-referenced to existing third-party certification systems to

recognize developers/builders who are pursuing independent certification status. In addition, it is widely recognized that the Building Code does not adequately address issues such as energy conservation and water conservation given both (1) the societal and ecological imperative to demonstrate such conservation measures and (2) the available technology and building techniques to achieve such measures. The Ontario Building Code provides the regulation for minimum building requirements and that municipalities cannot legally enforce a higher standard. However, collaborating with York Region and local municipalities to identify policy and incentive mechanisms to raise the minimum requirements to achieve improved sustainability performance of development is recommended. Successfully implementing enhanced requirements above current regulatory provisions is likely only to be accomplished if they are applied consistently across York Region. Therefore, municipal collaboration with York Region and the development industry to identify financial and other mechanisms that recognize enhanced sustainability performance above identified requirements should take place.

It is requested that the Region modify its draft document by replacing words such as "shall require, introduce, implement", or other words having a similar effect, in favour of such general terms as "promote, encourage", etc. where appropriate.

Secondary Suites

Policy

Policy 3.5.22 (Page 30) - The draft OP requires that local Official Plans and zoning by-laws *shall* include "as-of-right" secondary suite policies.

Comment

The issue of "as-of-right" secondary suites should be determined by the municipality and be reviewed more thoroughly by the local area municipality to identify impacts on servicing, parking, school enrollment, and community services, etc. It was recommended by Committee of the Whole (Working Session) on September 15, 2009 that policy 3.2.5.22 contained in the Draft Regional Official Plan – June 2009, be amended to read as follows:

*22. That local municipalities shall **consider** including "as-of-right" secondary suite policies, on a municipal-wide basis, in local official plans and zoning by-laws; and*

Policy-Specific Comments

Policy-specific comments are outlined in Appendix 1.

Relationship to Vaughan Vision 2020/Strategic Plan

In consideration of the strategic priorities related to Vaughan Vision 2020, the recommendations in this report will contribute to:

- Enhancing and ensuring community safety, health and wellness;
- Lead and promote environmental sustainability;
- Preserve our heritage and support diversity, arts and culture;
- The pursuit of excellence in service delivery;
- Planning and managing growth and economic vitality; and;
- Promoting effective governance;
- Plan and manage growth and economic vitality

Regional Implications

Regional implications may include the amending and revising the Region's Draft Regional Official Plan based on Council's direction.

Conclusion

The Draft York Region Official Plan – June 2009 provides significant updates and enhancement to current Regional planning policies. By and large, the Draft ROP addresses planning matters of Regional concern and is supportive of local planning policy. Some policies, however, appear to be prescriptive and encroach into areas of local planning policy jurisdiction. This report identifies a number of policies that need re-wording to better address Regional and local levels of planning responsibilities. City staff will continue to work with Regional staff to coordinate the City's Official Plan policy work with the Region's.

Attachments

1. Appendix 1 – Policy Specific Comments

Report prepared by:

Melissa Rossi, Policy Planner 1
Wayne McEachern, Manager Policy Planning

Respectfully submitted,

John Zipay
Commissioner of Planning

Diana Birchall
Director of Policy Planning

Appendix 1

The following are the City of Vaughan's comments pertaining to the June 2009 – Draft Region York Official Plan (primarily arranged by section number):

General Comments:

1. Chapters 5 and 7 speak to parking, but make no reference to on-street parking, and on recognizing the changes in character of development along regional roads. Where such roads traverse urban or intensification areas, on-street parking should be provided at least in off-peak hours and ideally in on-street lay by areas.
2. Terms that require a definition in the "Definition" section of the ROP include: *Human Services, Community Energy Plans, Social Housing, Places of Worship, Local Community Gardening Plots, Core Areas, Corridor / Linkage areas, Net Ecological Gain, Greenlands System Plan, Sensitive groundwater recharge / discharge areas, Vulnerable aquifer areas, Social Housing, Secondary Suites, Enhancement Areas and Linkage Opportunity.*
3. All reference to "Vaughan Corporate Centre" should be revised to "Vaughan Metropolitan Centre".
4. The Region should encourage more Accessibility Planning in all forms of development according to the *Accessibility for Ontarians with Disabilities Act (AODA)* throughout the document.
5. No indication of boundaries for Parkway Belt West Plan on Maps 1-12. Since this is a Provincial Policy and is still in effect, and Section 8.4.7 speaks to lands within the Parkway Belt West Plan, mapping reflecting the boundaries should be included in either Map 1 as an overlay, or on its own Map (Map 13). This will assist local municipalities with implementation and enforcement issues on the Parkway Belt West plan.
6. There currently exists significant environmental features and existing subdivisions where the East-West Economic Corridor is located on Map 1: Regional Structure, Map 11: Transit Network, and Map 12: Street Network. It is requested by Committee and Council (September 15, 2009) that the Regional Municipality of York, Ministry of Transportation, Ministry of Municipal Affairs and Housing, Ministry of Environment and Metrolinx review the corridor boundaries as shown in the maps aforementioned, and show the GTA East West Economic Corridor north of Kirby Road from west of Concession 10 to Highway 400 in Vaughan.

Chapter 2 – Sustainable Natural Environment:

7. Policy 2.1.6 (Page 7) – That in the Urban Area and Towns and Villages, the "*Regional Greenlands System shall be identified more specifically in local official plans and secondary plans and integrated into community design. These plans shall contain policies and detail initiatives that encourage System remedial works and enhancement opportunities.*" The boundaries and possible areas of differentiation between the proposed Greenlands System identified in Map 1 and Map 2 of the Draft ROP and Vaughan's proposed Natural Heritage System (NHS), will be identified through the Natural Heritage System Study as part Vaughan's Official Plan Review.
8. Policy 2.1.8. (Page 7) – "*That development applications within or in close proximity to the Regional Greenlands System but outside of the Oak Ridges Moraine and the Greenbelt shall be accompanied by an environmental impact statement.*" Consider including in the policy

statement a definition or examples of a development “*in close proximity*” to the Regional Greenlands System. The revised Natural Heritage Reference Manual (Draft) generally recommends 120 m as the definition for the “adjacent lands” and this could be used to guide “close proximity” if no other information is available regarding the sensitivity of the features in the Greenlands System. The draft OP requires (i.e. shall) development applications within or in close proximity to the Regional Greenlands System (outside of the ORM and Greenbelt) to be accompanied by an environmental impact statement. The Region should clearly state the *type* of development applications it is referring to. This policy requires further discussion and clarification in consultation with local municipalities.

9. Policy 2.1.9 (Page 7) – *“That in new community areas, local official plans shall include policies, programs and initiatives to link and enhance the Regional Greenlands System through community design and the development process. Enhancement opportunities shall be focused on the Natural Heritage System within the Protected Countryside of the Greenbelt.”* Given that the Protected Countryside area in the northern part of Vaughan is not continuous, the last sentence in this policy could read, *“Enhancement opportunities shall be focused on the Natural Heritage System within and linking the Protected Countryside areas of the Greenbelt”*.
10. Policy 2.1.11 (Page 7) – Regarding permitted uses for lands within the Regional Greenlands System. Permitting the identified uses in the Greenlands System should not only be subject to Greenbelt Plan policies, but should also consider Conservation Authority regulations (e.g. no stormwater management facilities below top-of-bank).
11. Policy 2.1.14 (Page 8) – That *“infrastructure projects shall enhance and invest in the Regional Greenlands System”* appears vague and open to interpretation. The policy would benefit from explicit mention of the metrics to measure or evaluate whether this policy has been addressed. Furthermore, if this is intended as a requirement by using the word “shall”, then why not be clear about this requirement as suggested in the revised wording below.

“That the planning, design and construction of infrastructure projects shall enhance and invest in the Regional Greenlands System,…”

12. Policy 2.1.22.d(iii) (Page 9) - *“Where permitted non-agricultural uses are proposed within the Natural Heritage System of the Protected Countryside, applicants shall demonstrate that: iii) buildings or structures do not occupy more than 25% of the area outside of key natural heritage features and key hydrologic features and their minimum vegetated protection zones”* It is not clear why the statement does not simply follow the text of the Greenbelt Plan that buildings and structures not occupying more than 25% of the total developable area. Excerpt from the Greenbelt Plan below:

“Buildings or structures do not occupy more than 25 percent of the total developable area and are planned to optimize the compatibility of the project with the natural surroundings.”

13. Policy 2.1.23 (Page 9) – There is a reference to Map 1. Is this a reference to the Greenbelt Plan or ORMCP as the Regional Greenlands System is depicted on Map 2 of the DRAFT ROP?

Chapter 3 – Healthy Communities

14. Policy 3.1.1 (Page 23) – *“recognizing that the design of communities is directly related to human health”, please add “well-being”* to the end of sentence.
15. Section 3.4, Cultural Heritage (***Please add in***) - York Region's more recent European influenced...Newmarket's Quaker Meeting House *and the Village of Maple's octagonal*

Jacob Rupert House. Please add to reflect more proportionately the significant heritage assets of Vaughan.

16. Policy 3.4.11 (Page 28) – *“planning for the protection and/or management of archaeological resources prior to approval of development or site alteration”*. It is suggested that removing the reference to “managing archaeological resources”. Rather, archaeological resources, since they are generally associated with river valleys and generally do not occupy a large portion of a development area, should be protected *in-situ* so that they are not disturbed by development or site alteration.
17. Policy 3.4. (Page 28), **(Please add in)** - Objective: 13. *To promote respect and understanding of our aboriginal roots and to explore opportunities to develop educational and interpretive resources using archaeological resources.*
18. Policy 3.5.18 (Page 30) – Please revise to read the following: *“To encourage innovative-new building design that will facilitate subsequent conversion to provide additional housing units, such as secondary suites”*. Building designs do not have to be innovative or new in order to encourage conversion to provide additional housing units, such as secondary suites.
19. Policy 3.5.19 (Page 22) – referring to *“encouraging accessibility features in all new housing”* – this should apply to all aspects of planning as per the AODA Act, not just houses/residences, but all public, private and community areas.

Chapter 4 – Economic Vitality

20. General Comments (4.2 City Building) – **(Please add in)** The Region and local municipalities will continue....encouraging attractive, *compact* community design.... (Need to underscore correlation between compact development and ease of interaction that promotes economic vitality).
21. Policy 4.2. (Page 32) **(Please add in)** – Objective: 8. *To ensure that policies at all levels reinforce Regional Centres and Corridors. Major public facilities should be located within and along Regional Centres and Corridors.*
22. Policy 4.2.7 (Page 33) – **Please add** as additional policy after 4.2.6 the following: To ensure the efficient and comfortable movement of people through effective planning, urban design and infrastructure planning.
23. Policy 4.3 (Page 33) – Protecting Employment Lands (General Comments) – Concord Employment Lands and Highway 427 / Highway 7 Employment lands (Vaughan West Employment Lands) should be designated as “York Region Strategic Employment Lands” in Figure 2 of Draft ROP (York Region Strategic Employment Lands).
24. Policy 4.3.5 (Page 34) – Reorder sentence to read: To require flexible and adaptable employment land that includes a street pattern and building designs that allows for both redevelopment and intensification.
25. Policy 4.4.4 (Page 35) – Refer to “street-related retail” not “street-level retail” since this is too vague and would include retail facing onto parking lots and backing onto streets.

Chapter 5 – Building Cities and Complete Communities

26. Policy 5.1 Forecasting and Phasing Growth (Page 39): In the event of slower growth, intensification of existing serviced urban areas should be a priority to avoid sprawl and leapfrog urbanization that is inherently inefficient and uses up strategically important arable

land. A clear policy statement should articulate what pattern of development should occur in the event of slower growth.

27. Many of the same policies regarding sustainable built form are repeated in subsections 5.2 to 5.5. Generally, the City is in agreement with the policies as they pertain to (a) compact form/mixed use development, (b) mobility, (c) greenspaces/greenscapes and (d) resource conservation (e.g. energy and water efficiency, renewable energy, etc). However, performance standards are often absent from the policies. As such, it is recommended to add a policy to require by 2012 that all local municipalities develop and implement sustainability checklists for use through development review to track progress in achieving policies 5.2.6 through 5.2.14, 5.2.17 to 5.2.19, 5.2.21 and 5.2.25, and to document sustainability performance improvements in these areas.
28. Policy 5.2.8. (Page 43) – regarding employing the highest standard of urban design - **Please add in - g: creates well-defined, centrally-located urban public spaces**
29. Policy 5.2.9 (Page 43) – *“That retail, commercial, office, and institutional structures be carefully designed in a compact form and be pedestrian-oriented, transit supportive, and multi-storey where appropriate”*. **Please add in -** That retail, commercial, office ...compact form and be pedestrian-oriented, transit-supportive and multi-storey where appropriate. Automobile-oriented uses such as drive-throughs should be restricted in Regional Centres and Corridors as well as smaller areas undergoing or planned for intensification. The City is currently undertaking a Parking Standards Review, in consultation with the Region addressing objectives a) to d), however it would also be beneficial to local municipalities if the Region worked with local municipalities to consider policies that speak to on-street parking on major arterial Regional roads. This would support the reduction of required surface parking and support the viability of street related retail and other commercial uses and perform a traffic calming role.
30. Policy 5.2.10 (Page 44) - The draft OP requires that retail, commercial, office and institutional structures shall be ... street-oriented... Please refer to staff report comment regarding “Jurisdictional Issues”. **(Please add in) – a. contextually-based parking standards with reduced maximum and minimum parking requirements that reflect the availability and walking distance to transit and complementary uses;**
31. Policy 5.2.15 (Page 44) – regarding the encouragement of municipal-wide community energy plans - a time frame should be specified for completion of the community energy plans or milestones identified such as those in the Partners for Climate Protection program.
32. *Policy 5.2 (Page 45), Please add in - Objective 27, To require that new subdivision or infill developments as well as redevelopments provide sufficient depth of quality soil, protection from compaction and salt-infiltration to promote street tree growth and urban forest enhancement. A dense urban forest helps mitigate the urban heat island effect as well as filter pollution.*
33. Policy 5.4. – City Building - (General Comment) The Region may want to include **“culturally diverse”** as an additional pillar to sustainable “City Building”. Also include in the Introduction last sentence (Page 47) – **Please add** “and built” to “and preserves natural”.
34. Policy 5. 4. 6. d (Page 49) – The requirement *“to include a concentration of the most intensive development and greatest mix of uses within reasonable and direct walking distance of rapid transit stations and/or planned subway stations”* may not be achievable in certain locations where there are existing stable residential areas and/or heritage buildings (e.g. Yonge Street or Woodbridge, Maple areas). The last sentence in the first paragraph to the introduction under Regional Corridors (Page 53) could be repeated at the end of this

policy for clarification. A similar concern exists for Policy 5.4.23. b (Page 52) and Policy 5.4.33. b (Page 54).

35. Policy 5.4.6 g (Page 49) - *"That comprehensive secondary plans for the Regional Centres and Corridors be prepared by local municipalities and implemented in cooperation with the Region and related agencies. These secondary plans shall include: g) policies to ensure excellence in urban design and sustainable construction methods, including winter design".* The reference to "winter design" will need to be elaborated upon in order to be clear.
36. Policy 5. 4. 34. (Page 54) – That *"new development and intensification along Regional Corridors support an overall, long-term density target of 2.5 floor space index for developable lands"*. Clarify as to whether 2.5 floor space index for developable lands is gross, net or gross/net.
37. Policy 5.5.3 (Page 55), **(Please add in)** – *h, that road widths and traffic calming methods such as crosswalks, chicanes and layby parking be incorporated to establish the pre-eminence of the pedestrian.*
38. Policy 5. 5. 3. j (Page 55) -**(Please add in)** "heritage policies and" after "to revitalize and preserve cultural heritage resources within core historic areas through".
39. Policy 5.5.4 (Page 55) d - **(Please add in)** To establish consistent setback **and frontage** provisions to encourage a continuous **street wall** adjacent to the street right-of-way;
40. Policy 5.5.4 (Page 55) f **(Please add in)** - To encourage pedestrian activity *by restricting automobile-dependent land uses such as drive-throughs*; through the arrangement and design of land development sites and related streetscaping treatments;
41. Policy 5. 5. 4. g (Page 56) -**(Please add in)** "and Municipal" after "be consistent with Regional".
42. Policy 5.6.8. (Page 57) – That *"new community areas shall be designed to have high-quality urban design, attractive buildings, landscaping and public streetscapes, consistent with policy 5.2.8 of this Plan."* The term "attractive buildings" is vague and subjective, therefore open to interpretation by City and public. Another less subjective term should be used.
43. Policy 5. 6. 9. (Page 57) – **Please add** as an additional policy after 5.6.8 the following: *That the new community areas be planned and designed to consider both sides of a corridor and all sides of a major intersection whether opposite side or corner is being considered for development or not.*
44. Policy 5. 6. 15. e (Page 58) – **Please add** at end: "and be required to develop a transportation demand management plan to the satisfaction of the municipality".

Chapter 6 - Agricultural and Rural Areas

45. Policy 6.2.16 (Page 67) – *"That new multiple units or multiple lots for residential dwellings, such as estate residential developments, adult lifestyle, retirement communities created by plans of subdivision or condominium are prohibited in the Oak Ridges Moraine unless all required applications have transitional status."* This policy appears to apply to all ORMCP designations. However, the Settlement Area designation allows multiple-residential development according to municipal official plans. It should be clarified whether Policy 6.2.16 should specifically make reference to Natural Core, Natural Linkage and Countryside designations.

46. Policy 6.3.11 (Page 69) – “*That within the Agricultural Area in those portions of Markham, Vaughan and East Gwillimbury, not within the Oak Ridges Moraine Conservation or Greenbelt Plans, normal farm practices and a full range of agricultural uses, agriculture-related uses and secondary agricultural uses shall be permitted and encouraged until and if the lands are required for urban expansion. Redesignation of lands required for new community areas will not require an agricultural justification report but shall be subject to the urban expansion and phasing policies in Chapter 5 of this Plan and local official plans.*” The rationale for removing the requirement for an agricultural justification report is not clear. Perhaps it can be made more clear in policies 5.1.12 and 5.2.13 which lands do not require a comprehensive review (as it is being completed as part of the current Vaughan OP review process) and that any remaining Agricultural lands will require a comprehensive review if urban area expansion is contemplated.

Chapter 7 – Servicing Our Population

47. Policy 7.1.3 (Page 78) - The draft ROP includes a policy to manage the supply of parking in Regional Centres and Corridors. The Region should work with local municipalities on and encourage the management of the supply of parking in Regional Centres and Corridors.
48. Policy 7.4.8 k (Page 103) - The Region's current exemption policy (which is proposed to remain) for local official plan amendments includes items not eligible for exemption including applications that have had a statutory public meeting. In Vaughan, public meetings are scheduled shortly after receiving a development application to obtain feedback from the public early in the process, and waiting to receive a written response from the Region on the exemption request can delay scheduling the public meeting. It is the opinion of the Development Planning Department that the outcome of the exemption request (i.e. to exempt or not) does not have any bearing on when the public meeting is held, and that this policy should be deleted.

Chapter 8 – Implementation

49. Policy 8.3.8. (Page 102) – (g) Applications which do not conform to Places to Grow should not be exempt from York Region approval as well. ***Please add in*** to read as:
- g. *all applications which are not consistent with the Provincial Policy Statement and/or Places to Grow;*