| Submission Numbers | Date of Submission: | Submission Author: |
|---|---|---|
| D05.2009.002.1.001<br>D05.2009.002.1.006 | May 5, 2010 | Brutto Consulting (on behalf of Highmeadow Place Holdings Inc) |
| Delegation at Statutory Meeting | June 16, 2010 | Claudio Brutto |

| Comments or Requested Change to Proposed ROPA 2 | Analysis and Recommendation |
|---|---|
| Property: Northeast corner of Keele Street and Kirby Road in the City of Vaughan, within Block 21<br><br>Client's property, as currently constituted in ROPA 2 would remain the only isolated and non urbanized corner at the crossroads of Kirby Road and Keele Street. We can see no logical planning rationale that would cause this significant restriction to be placed on our clients lands at this time and to have our clients wait until possibly after 2015 for such a small area to develop while development has occurred on the balance of the crossroads. All four corners should be developed to complete the development of intersection and to possibly facilitate the future Go Transit Station. | York Region's municipal comprehensive review included the completion of forecasting and land budget work, a Regional Intensification Strategy, a comprehensive public consultation exercise throughout 2006 to 2009, infrastructure master plan updates for transportation, and water and wastewater and an updated Natural Heritage Strategy.<br><br>A thorough and detailed land budget report was made available in March, 2010. The Region's land budget is a key component of the regional municipal comprehensive review and Growth Plan conformity exercise. Detailed consultations were held with provincial staff on the land budget methodology and assumptions.<br><br>The land budget work included:<br><br>• The use of the Growth Plan's forecasts, densities and intensification for York Region.<br>• The completion of an intensification strategy that identifies a minimum 40% residential intensification target between 2015 to 2031, and plans for 88% of residential growth and 83% of employment growth to occur in existing Urban Areas.<br>• An assessment of the available residential and employment land supplies and demonstration of the need |

**Delegation at Statutory Meeting**
Request inclusion of 6 acres of clients lands in northeast corner of Kirby and Keele outside of the Greenbelt Plan into the urban expansion area

for a proposed urban expansion, and;
- A demonstration of how the minimum designated greenfield area density target of 50 people and jobs per hectare is to be achieved.

A portion of the Whitebelt is required to accommodate the York Region's forecast growth. The Regional Official Plan and the urban area expansion Amendments ROPA's 1,2,3 implement the results of the regional municipal comprehensive review.

The boundaries for the urban area expansion amendments are:

- Clearly defined (i.e. concession streets, major natural features, utility corridors)
- Contiguous expansion to urban area
- Large enough for new generation of planned communities (block plan, secondary plan process)
- Consistent with local priorities

The Region will carefully monitor the pace and nature of intensification and growth.

Received May 5, 2010

D05.2009.002.1.001

**From:** Claudio Brutto [mailto:cbrutto@bruttoconsulting.ca]
**Sent:** Wednesday, May 05, 2010 11:55 AM
**To:** Waller, John; Tuckey, Bryan; Jeffrey, Barb
**Cc:** 'Zipay, John'; Grant Uyeyama; jokawa@bruttoconsulting.ca; mking@bruttoconsulting.ca
**Subject:** Highmeadow Place Holding Inc, City of Vaughan, Input to Region of York Official Plan and Official Plan Amendment Two

Greetings to each of you.

I am writing to you at this time on behalf of Highmeadow Place Holdings Inc. who are the owners of some 100 acres of land situated at the very northeast corner of Keele Street and Kirby Road in the City of Vaughan. See location plan attached. It is within Block 21.

We have just recently been retained by Highmeadow Place Holdings Inc. and have begun to explore planning matters pertaining the subject property. Our clients intention is to have us quickly catch up to put its information forward in an expeditious manner.

Having followed the Regions and the City's deliberations regarding the Official Plan Review Process we are aware that Official Plan Amendment Two, pertaining to the Vaughan Urban Expansion Area, in effect designating Block 20 as Urban will come before the Planning and Economic Development Committee on May 5th 2110 at 1 pm. I will be in attendance at that meeting but would appreciate having this email/memo serve as our formal input at this time. I will also make a formal presentation at that time should the Committee permit.

At this time our clients have asked that we make this intitial formal submission to advise of its interest in these Official Plan deliberations. To capture the sum total of its interest, our client would like to be included within the recommended Urban Expansion Area. As currently constituted the Official Plan fails to recognize these lands as Urban because the land is not in Block 20. However, our clients lands, once the details emerge, are much more analogous to Block 21 and you shall understand why so once details are forthcoming.

Our rationale for this request at this time is based on the fact that we believe that our clients land, being traversed by Greenbelt Protected lands along its northerly edge, would result in a more practical and rationale northern Urban Boundary for this block.

You will note that your Map 3 from Amendment 2 includes a sliver of land of Whitebelt lands that is somewhat limited in size and ought to be considered for inclusion at this time as part of Block 20 so that proper planning can occur along Kirby Road that considers all four quadrants of the intersection. The same principle could apply to the lands immediately on the west side of Keele Street and north of Kirby Road, a limited amount of land, defined by the greenbelt and the Oakridges Moraine which could be easily added to this component of the Urban Expansion area to facilitate proper planning.

We are in the process of preparing more definitive mapping and undertaking more comprehensive planning and environmental work to precisely define where the Greenbelt and Oakridges Moraine limits are situated on this property. Our client has also instructed our team of experts to prepare the necessary technical documents to assist the City and the Region in its deliberations going forward.

Could you please acknowledge receipt of this submission as part of our clients formal interest in the proceedings. We also respectfully ask that we be notified of any decisions arising from the deliberations/decisions of York Region and the City of Vaughan in respect of the Regions Official Plan and the City of Vaughan's Secondary Plan.

We look forward to working with you on this important matter.

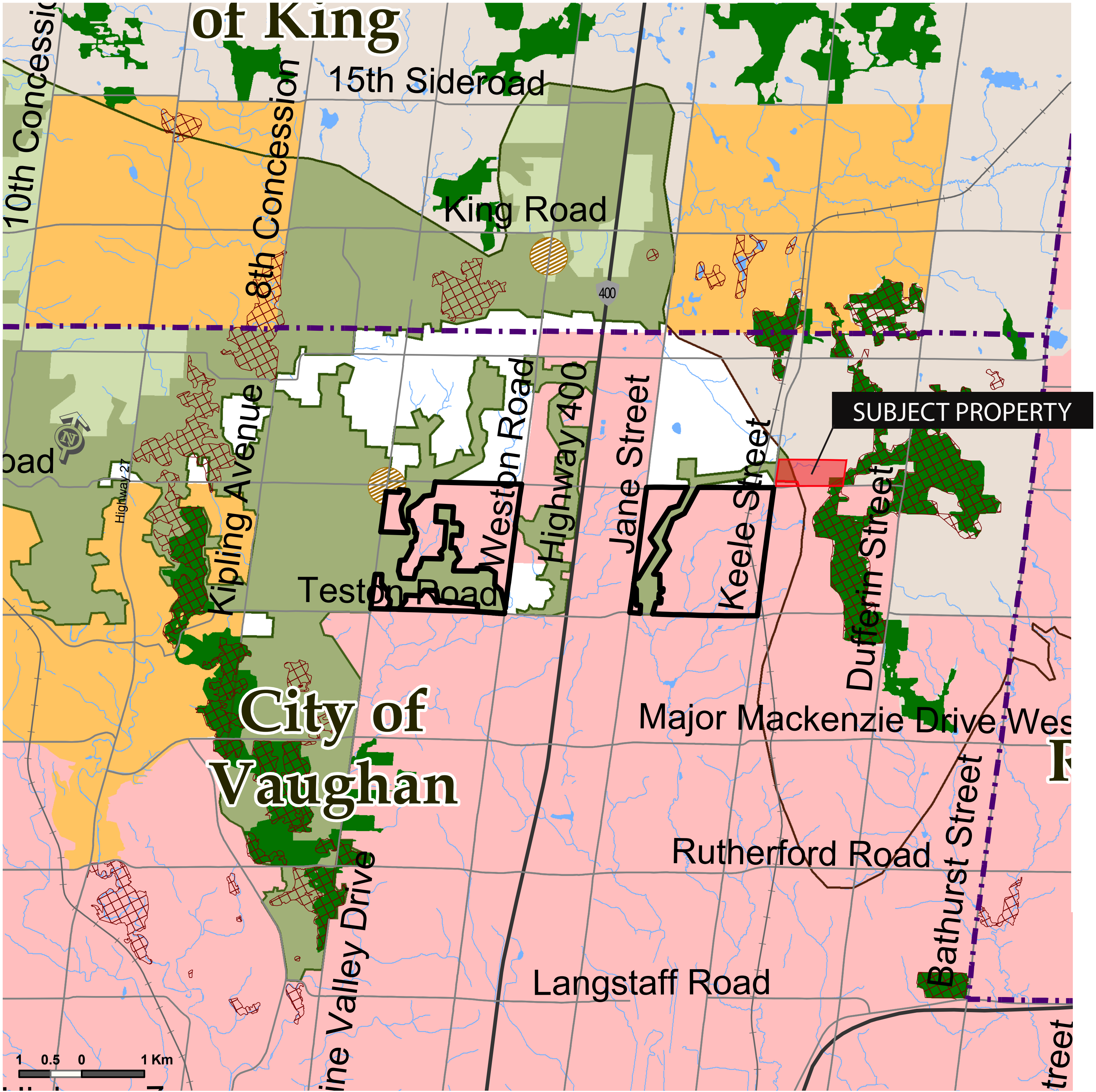
Claudio P. Brutto MCIP, RPP, PLE
President

BRUTTO
CONSULTING

3300 Highway 7 | Suite 610
Vaughan | Ontario | L4K 4M3
Tel 905.851.1201 ext 224
Fax 905.761.9890

**EXCERPT FROM MAP 3**

ENVIRONMENTALLY SIGNIFICANT AREAS AND LIFE SCIENCE AREAS OF NATURAL AND SCIENTIFIC INTEREST




Life Science Areas of Natural or Scientific Interest

Environmentally Significant Area

Oak Ridges Moraine Conservation Plan

Oak Ridges Moraine Boundary

Oak Ridges Moraine Plan Area

Greenbelt Plan

Greenbelt Plan Area Boundary

Greenbelt Protected Countryside / Hamlet

Natural Heritage System

Urban Area

Towns and Villages

Hamlet

Provincial Highways

Existing

Controlled Access Highway

Under Construction

Municipal Boundary

Regional Boundary

York Region Geomatics

Produced by: Geomatics
Planning and Development Services Department


**Figure 3 to 19OP-2009-002**

Received June 15, 2010

D05.2009.002.1.006

BRUTTO
CONSULTING

3300 Highway 7, Suite 610, Vaughan Ontario, L4K 4M3 Tel: (905) 851-1201 Fax: (905) 761-9890

June 11, 2010

Mr. Bryan W. Tuckey, M.C.I.P, R.P.P.
Commissioner of Planning and Development Services
Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario
L3Y 6Z1

Ms. Barbara Jeffery, M.C.I.P., R.P.P.
Manager, Land Use Policy and Environment,
Long Range And Strategic Planning
Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario
L3Y 6Z1

**Re:** Proposed Amendment 2 to the Official Plan for the Regional Municipality of York
City of Vaughan, File 19OP-2009-002
Subject Property, Highmeadow Place Holdings Inc.
100 Acres, Northeast Corner of Keele Street and Kirby Road, City of Vaughan

Dear: Mr. Tuckey and Ms. Jeffery,

We are writing this letter as a follow up to our correspondence to your department of May 5th 2010 and attendance before the Planning and Economic Development Committee of that same date pertaining to Official Plan Amendment 2 to the Official Plan for the Regional Municipality of York (ROPA 2), City of Vaughan, your file 19OP-2009-002.

This matter will come before the Regional Planning and Economic Development Committee Public Meeting on Wednesday June 16th 2010 at which we will be appearing as a delegation to speak on our clients' behalf.

We represent High meadow Place Holdings Inc, the owner of approximately 100 acres of land at the northeast corner of Keele Street and Kirby Road in the City of Vaughan within the Regional Municipality of York. Please see the attached illustrations for the precise location.

We note from ROPA 2 that our clients White belt lands are not included in the new Urban Expansion area of the City of Vaughan. Our client respectfully requests that ROPA 2 be revisited and amended to include a 6 acre the portion of the subject lands that are outside of the mapped areas of Oakridges Moraine and the Greenbelt within the Urban Expansion area .

We have included a survey plan on which our surveyor plotted, based on the provincial geodetic coordinates, the Greenbelt and ORM lines. Recalling however that the Oak ridges Moraine and Greenbelt lines imposed on the subject property were done so based on high level air photo interpretation and not on scientific ground oriented science. You will note that the ORM and Greenbelt lines are linear and do not reflect the true physical/environmental characteristics of the property.

To be clear, we provide the survey for information purposes only and on a without prejudice basis as we will be dealing with these arbitrary environmental delineations in detail in the immediate future as part of our ongoing involvement in ROPA 2 and the City of Vaughan Official Plan.

There is provision in the Provincial legislation to deal with these irregularities by making a formal approach to the Minister of Municipal Affairs and Housing or waiting until 2015 when the Greenbelt policy/mapping comes up for review. Our client has instructed us to deal with the irregularity on the 94 acres of the 100 acre holding that are seriously impacted by the Greenbelt and the ORM mapping.

To emphasize, the subject site is void of environmental features, this is clearly illustrated by the attached air photo and the survey that we have prepared and the site visit we have undertaken with our environmental consultants. The property is currently in active agricultural production and has been for many decades. If the lands exhibited environmental constraints they would not have been farmed to the extent that they have.

On the other hand, based on air photo interpretation and some off site visual inspection it is evident that environmental features appear to exist north of our clients property and there may be limited if in fact any opportunity for urban development on those lands. If our clients' property is not included at this time as part of ROPA 2 then essentially the plan for Block 21 may just entail our clients' property which may only include 6 acres. This seems onerous and not consistent with how the block planning process has occurred in Vaughan and the prospect of waiting for another Official Plan review to occur within 5 years is punitive to say the least especially when 6 acres are all that may remain for development in that block.

In the interim, it would be appropriate to include our clients 6 acres on the immediate corner of Keeled Street and Kirby Road as part of the ROPA 2 Urban Expansion Area. There are very sound planning reasons to undertake this minor change to ROPA 2 which are described below and are readily visible on the attached air photo.

1. The area to the immediate south of Kirby Road is now entirely developed as a single family residential area within the City of Vaughan Block 20.
2. The area to the north of the subject property appears to be environmentally constrained for the most part if not entirely as it is encumbered by the policy provisions of the Greenbelt and ORM.
3. The area to the immediate west of Keele Street is already developed with a Tim Horton's coffee shop and a Petro Canada automobile service station.
4. The area just further to the west of the above noted fast food and automobile service station is under development for quasi industrial uses and was done so by way of a Zoning Amendment outside of the Block Plan process and is municipally serviced.
5. We note that ROPA 2 delineates a green circle at the intersection of Keele Street and Kirby Road for a future Go Transit Station and this circle includes a portion of our clients' property.

6. The area on the southwest quadrant of Kirby Road and Keele Street is proposed for Urban Expansion and will likely develop within the next five years as part of Block 27.
7. Much of the land on the west side of Keele Street north of Kirby Road on the east side of the railway tracks is currently developed.

As can be denoted, our client's property, as currently constituted in ROPA 2 would remain the only isolated and non urbanized corner at the crossroads of Kirby Road and Keele Street. We can see no logical planning rationale that would cause this significant restriction to be placed on our clients lands at this time and to have our clients wait until possibly after 2015 for such a small area to develop while development has occurred on the balance of the crossroads. All four corners should be developed to complete the development of intersection and to possibly facilitate the future Go Transit Station.

We believe this is an oversight that can be easily rectified by including as a minimum the 6 acres to be included in ROPA 2. The balance of the lands can be dealt with once our detailed studies are completed and filed to the City and the Region. This is not an overarching precedent setting request, it is a minor amendment to recognize what has actually occurred on the ground.

We look forward to making our presentation at the Public Meeting. We ask that you kindly consider including our clients 6 acres within the Urban Area of the City of Vaughan. In the near future we would like to meet with you and City of Vaughan staff to make a presentation on our request and findings. I will be calling your department to follow up on this request.

Respectfully,

Claudio Brutto

Claudio P. Brutto, M.C.I.P, R.R.P., President
Brutto Land Management Consulting Limited

Attachments: Property Illustrations

Cc: Highmeadow Place Holdings Inc.
Mr. Mauro Peverini, Manager, Policy Planning, City of Vaughan
Local Councillor, City of Vaughan, Mr. Peter Meffe
Regional Councillor, City of Vaughan, Mr. Gino Rosati
Regional Councillor, City of Vaughan, Ms. Joyce Frustaglio
Regional Councillor, City of Vaughan, Mr. Mario Feri

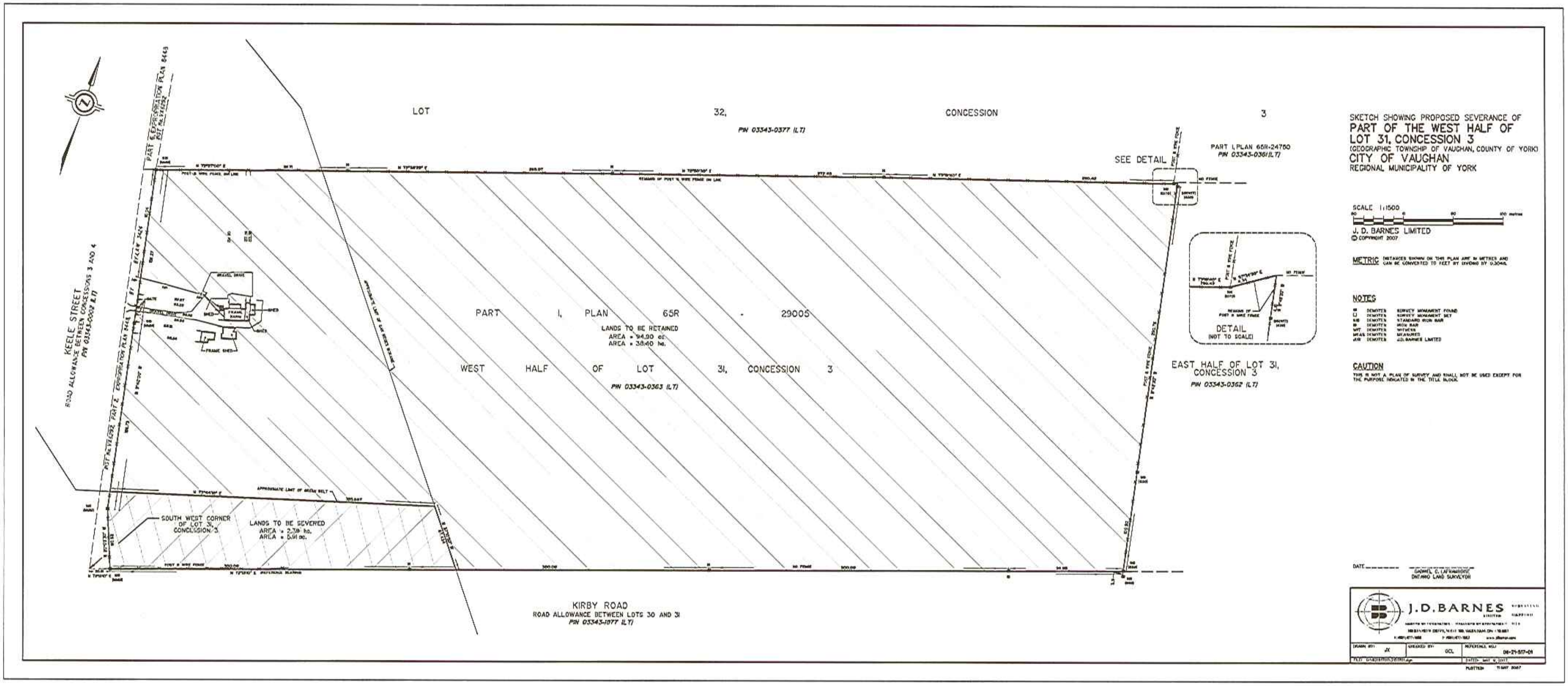

Subject Property

Scale 1:1500 (50 0 50 100m)

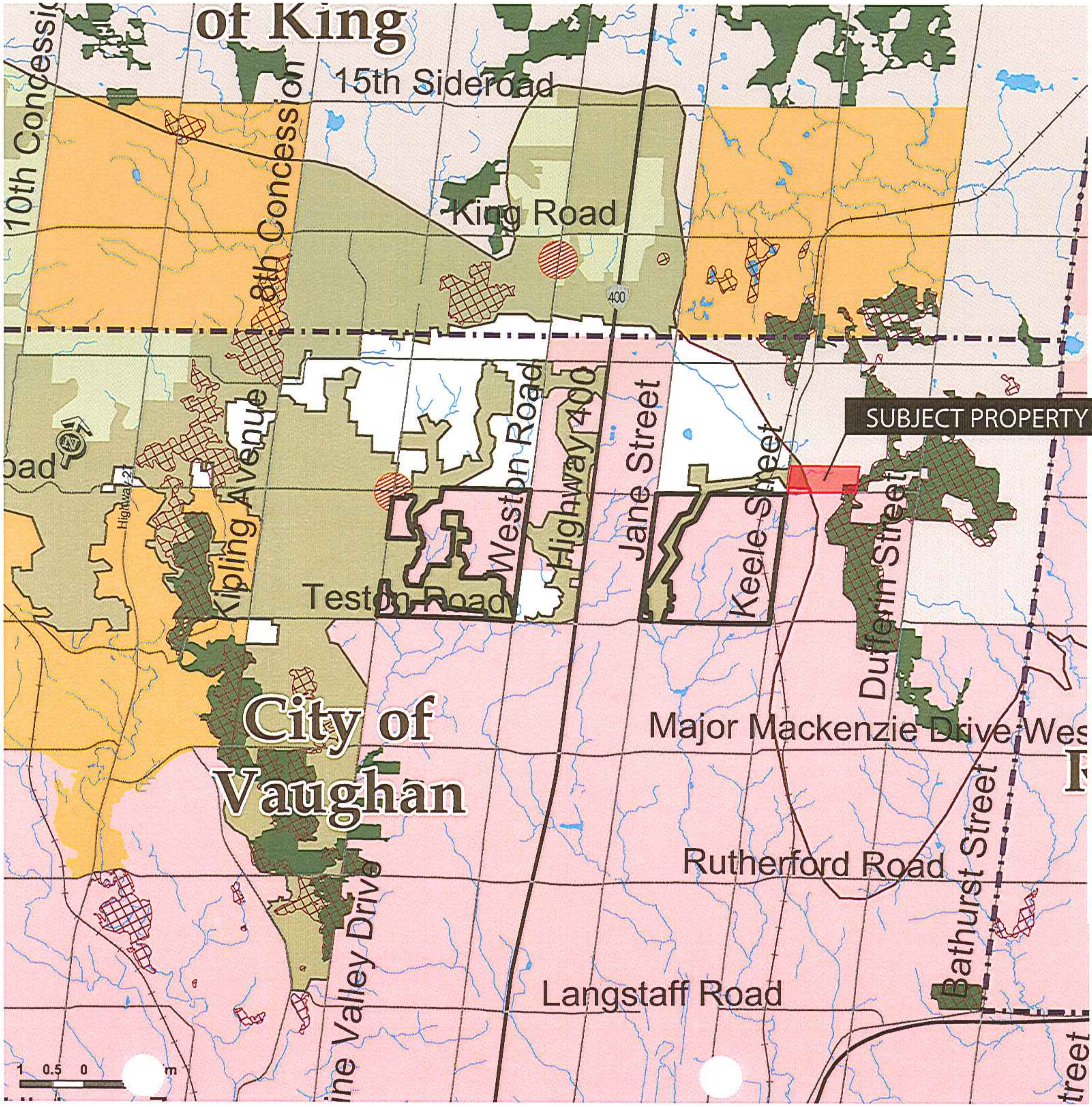
# WEST HALF OF LOT 31
CITY OF VAUGHAN

BRUTTO CONSULTING

J.D.BARNES LIMITED SURVEYING MAPPING GIS
MARKED BY INNOVATION · MEASURED BY REPUTATION™



SKETCH SHOWING PROPOSED SEVERANCE OF
PART OF THE WEST HALF OF
LOT 31, CONCESSION 3
(GEOGRAPHIC TOWNSHIP OF VAUGHAN, COUNTY OF YORK)
CITY OF VAUGHAN
REGIONAL MUNICIPALITY OF YORK
SCALE 1:1500
J. D. BARNES LIMITED
© COPYRIGHT 2007
METRIC DISTANCES SHOWN ON THIS PLAN ARE IN METRES AND CAN BE CONVERTED TO FEET BY DIVIDING BY 0.3048.
NOTES
CAUTION
THIS IS NOT A PLAN OF SURVEY AND SHALL NOT BE USED EXCEPT FOR THE PURPOSE INDICATED IN THE TITLE BLOCK.
DATE
ONTARIO LAND SURVEYOR
J.D.BARNES
LOT
32,
CONCESSION
3
PIN 03343-0377 (LT)
PART 1, PLAN 65R-24750
PIN 03343-0361 (LT)
SEE DETAIL
DETAIL
(NOT TO SCALE)
PART
1,
PLAN
65R
-
29005
LANDS TO BE RETAINED
AREA = 94.90 ac.
AREA = 38.40 ha.
WEST
HALF
OF
LOT
31,
CONCESSION
3
PIN 03343-0363 (LT)
EAST HALF OF LOT 31,
CONCESSION 3
PIN 03343-0362 (LT)
KEELE STREET
ROAD ALLOWANCE BETWEEN CONCESSIONS 3 AND 4
PIN 03343-0002 (LT)
SOUTH WEST CORNER
OF LOT 31,
CONCESSION 3
LANDS TO BE SEVERED
AREA = 2.39 ha.
AREA = 5.91 ac.
GRAVEL DRIVE
SHED
FRAME SHED
KIRBY ROAD
ROAD ALLOWANCE BETWEEN LOTS 30 AND 31
PIN 03343-1077 (LT)




**EXCERPT FROM MAP 3**

ENVIRONMENTALLY SIGNIFICANT AREAS AND LIFE SCIENCE AREAS OF NATURAL AND SCIENTIFIC INTEREST

- Life Science Areas of Natural or Scientific Interest
- Environmentally Significant Area

Oak Ridges Moraine Conservation Plan
- Oak Ridges Moraine Boundary
- Oak Ridges Moraine Plan Area

Greenbelt Plan
- Greenbelt Plan Area Boundary
- Greenbelt Protected Countryside / Hamlet
- Natural Heritage System

- Urban Area
- Towns and Villages
- Hamlet

Provincial Highways
- Existing

Controlled Access Highway
- Under Construction

- Municipal Boundary
- Regional Boundary

York Region Geomatics

Produced by: Geomatics
Planning and Development Services Department


Figure 3 to
19OP-2009-002

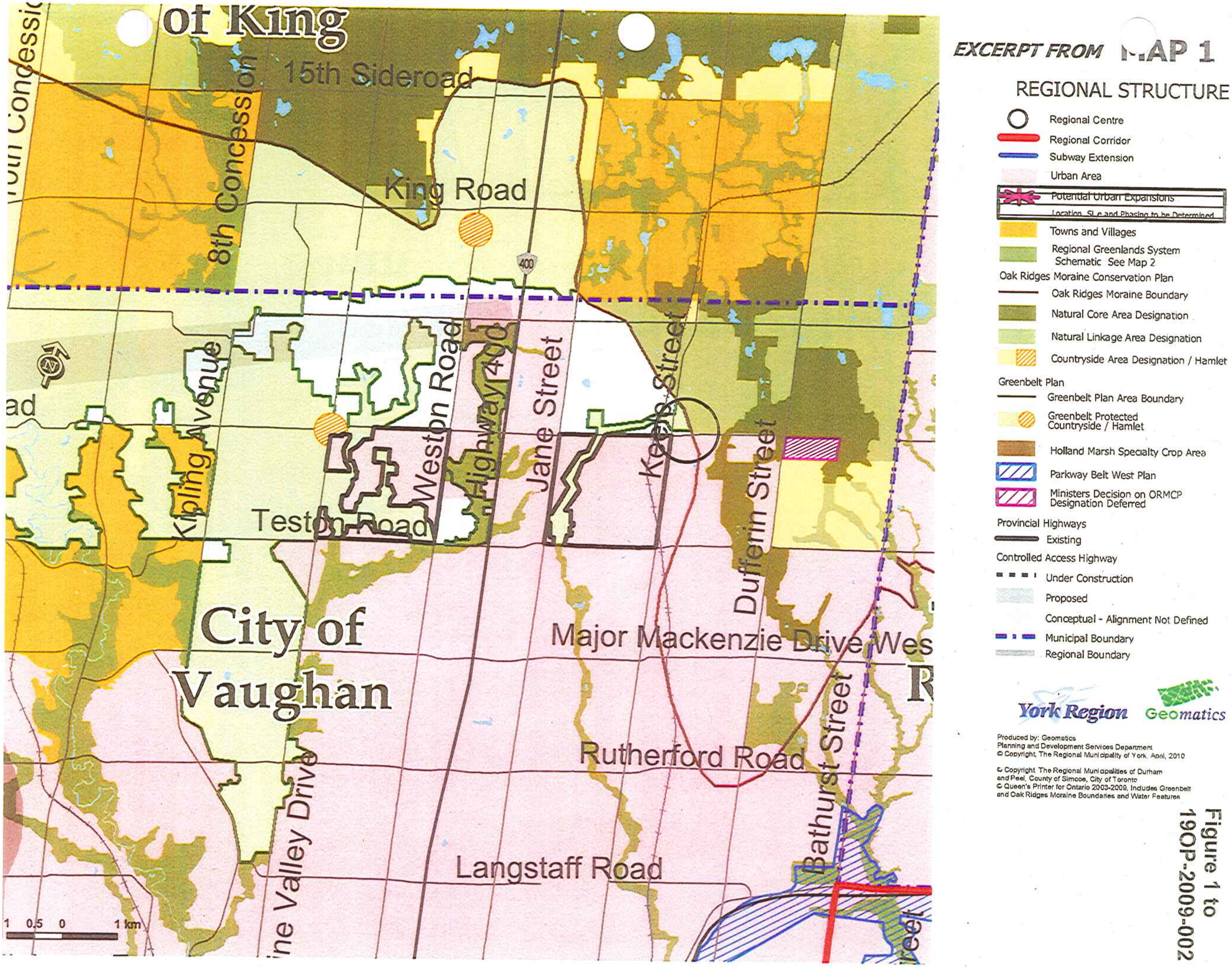



Figure 1 to 19OP-2009-002

| Submission Number D05.2009. 002.1.002 | Date of Submission: June 9, 2010 | Submission Author: Peter Smith, Bousfields Inc. on behalf of Block 27 Landowners Group, City of Vaughan |
|---|---|---|

| Comments or Requested Change to Proposed ROPA 2 | Analysis and Recommendation |
|---|---|
| Property: Block 27 lands are bounded by Keele Street to the east, Teston Road to the south, Jane Street to the west and Kirby Road to the north.<br><br>Landowners are supportive of the proposed designation of the Block 27 lands as *Urban Area*.<br><br>Request to be advised of any further meetings with respect to the Proposed Amendment 2. | No comment necessary.<br><br>Staff has recorded contact information to receive further notifications. |

Received June 9, 2010

D05.2009.002.1.002

BOUSFIELDS INC.

June 9, 2010

Project No. 0966

Mr. Bryan Tuckey
Commissioner of Planning and Development Services
York Region Administrative Centre
Planning and Development Services Department
17250 Yonge Street
Newmarket, ON L3Y 6Z1

Dear Mr. Tuckey:

***Re: Proposed OPA 2 (File 19OP-2009-002)***
***Comments on behalf of the Block 27 Landowners' Group, City of Vaughan***

We are planning consultants for the Block 27 Landowners' Group. On their behalf, we are pleased to provide the following comments on the Proposed Amendment 2 to the Official Plan for the Regional Municipality of York.

The Block 27 lands are bounded by Keele Street to the east, Teston Road to the south, Jane Street to the west and Kirby Road to the north. These lands were previously identified as *Potential Urban Expansions* in the York Region Official Plan as adopted by Regional Council in December 2009.

We are supportive of the proposed designation of the Block 27 lands as *Urban Area*. In this regard, we support the achievement of an appropriate balance in accommodating population growth within a variety of appropriate locations, encompassing both new community areas and intensification within the existing built-up area.

Thank you for your consideration of these comments. We also request that our office be advised of any further meetings with respect to the Proposed Amendment 2. Please do not hesitate to contact me or John Bousfield of this office should you wish to discuss any of these matters further.

Yours truly,

**Bousfields Inc.**

Peter F. Smith B.E.S. MCIP, RPP

cc: Block 27 Landowners Group
Gerry Lynch, Cole Engineering
John Waller, Director Long Range and Strategic Planning
Barbara Jeffrey, Manager Land use Policy and Environment

| Submission Number D05.2009.002.1.003 | Date of Submission: June 14, 2010 | Submission Author: Altus Group (on behalf of Kirwen Developments Inc and Wallgate Investments Ltd) |
|---|---|---|
| **Delegation at Statutory Meeting** | **June 16, 2010** | **Sonia Turajlich, Bisceglia and Associates (on behalf of Kirwen Developments and Wallgate Investments)** |

| Comments or Requested Change to Proposed ROPA 2 | Analysis and Recommendation |
|---|---|
| Properties:<br>Wallgate - Concession 6, Part Lot 31<br>Northeast corner of Pine Valley Drive and Kirby Road<br><br>Kirwen - 3840 Kirby Road, Concession 6, Part Lot 31<br>Northwest corner of Weston Road and Kirby Road<br><br>The proposed urban area boundary expansions in Vaughan are insufficient to accommodate the projected population growth during 2006-2031 allocated by the Region of York to the City of Vaughan.<br><br>Additional community/residential lands in the whitebelt should be included within an expanded urban area in Vaughan beyond the lands proposed to be included in proposed Amendment No. 2 to the Official Plan for the Regional Municipality of York, and the draft New Vaughan Official Plan.<br><br>Reasons / background for these conclusions include:<br>- Treatment of Apartments in Detached Duplexes<br>- Potential Residential Land Supply Within the Existing Urban Boundary<br>- Community/Residential Land Requirements in the Whitebelt for Major Retail Uses | York Region's municipal comprehensive review included the completion of forecasting and land budget work, a Regional Intensification Strategy, a comprehensive public consultation exercise throughout 2006 to 2009, infrastructure master plan updates for transportation, and water and wastewater and an updated Natural Heritage Strategy.<br><br>A thorough and detailed land budget report was made available in March, 2010. The Region's land budget is a key component of the regional municipal comprehensive review and Growth Plan conformity exercise. Detailed consultations were held with provincial staff on the land budget methodology and assumptions.<br><br>The land budget work included:<br><br>• The use of the Growth Plan's forecasts, densities and intensification for York Region.<br>• The completion of an intensification strategy that identifies a minimum 40% residential intensification target between 2015 to 2031, and plans for 88% of residential growth and 83% of employment growth to occur in existing Urban Areas.<br>• An assessment of the available residential and employment land supplies and demonstration of the need |

- Density Used to Calculate Community/Residential Land Requirements in the Whitebelt
- Proposed Conversion of Employment Land

**Delegation at Statutory Meeting**
Object to the Boundary proposed in ROPA 2 and request that the clients lands be included in the urban boundary.
Clients have provided a report by the Altus group

for a proposed urban expansion, and;

- A demonstration of how the minimum designated greenfield area density target of 50 people and jobs per hectare is to be achieved.

A portion of the Whitebelt is required to accommodate the York Region's forecast growth. The Regional Official Plan and the urban area expansion Amendments ROPA's 1,2,3 implement the results of the regional municipal comprehensive review.

The boundaries for the urban area expansion amendments are:

- Clearly defined (i.e. concession streets, major natural features, utility corridors)
- Contiguous expansion to urban area
- Large enough for new generation of planned communities (block plan, secondary plan process)
- Consistent with local priorities

The Region will carefully monitor the pace and nature of intensification and growth.

Received June 14, 2010

D05.2009.002.1.003

Independent Real Estate Intelligence

Altus Group

June 14, 2010

Mr. Brian Tuckey
Commissioner of Planning and Development Services
Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario L3Y 6Z1

Dear Mr. Tuckey:

**Re:** **Vaughan Official Plan Review**
**Our File:** **P-4356**

Altus Group Economic Consulting was retained by Kirwen Developments Inc. (Kirwen) and Wallgate Investments Limited (Wallgate) to review background documents prepared by/for the Region of York and the City of Vaughan pertaining to the proposed urban area boundary expansions for community/residential lands in the City of Vaughan. This letter presents our preliminary findings.

## EXECUTIVE SUMMARY

There are a number of inconsistencies between the assumptions and information used in background documents pertaining to the proposed urban area boundary expansions in Vaughan prepared by the Region of York and by/for the City of Vaughan, as well as between earlier and more recent versions of some of these documents. Many of these inconsistencies are not explained in the applicable documents. Some of the assumptions and information used are open to question or are not sufficiently substantiated. A full understanding of the implications of these findings is difficult without having access to more detailed information on the data and assumptions used, which we understand had been requested some time ago on behalf of Kirwen and Wallgate. In the absence of this more detailed information, our preliminary conclusions are that:

Research, Valuation & Advisory | Cost Consulting | Realty Tax Consulting | Geomatics | Economic Consulting
1580 Kingston Road, Toronto, ON M1N 1S2 Canada T 416.699.5645 F 416.699.2252
altusgroup.com

- The proposed urban area boundary expansions in Vaughan are insufficient to accommodate the projected population growth during 2006-2031 allocated by the Region of York to the City of Vaughan; and

- Additional community/residential lands in the whitebelt should be included within an expanded urban area in Vaughan beyond the lands proposed to be included in proposed Amendment No. 2 to the Official Plan for the Regional Municipality of York, and the draft New Vaughan Official Plan. This includes land to accommodate approximately 1,330 additional single-detached units related to the projected growth in apartments in detached duplexes, 75 hectares of land for major retail uses, approximately 70 hectares to accommodate the supply shortfall of 9,630 units identified by the City at a density of 17.5 units per gross hectare rather than 20 units per gross hectare, plus approximately 62 hectares if the employment lands in East Elder Mills are not redesignated to permit residential uses as proposed. There may also be additional community/residential lands required in the whitebelt if it is confirmed that there is an overstatement of the potential housing supply within the existing urban area, and/or if other lands proposed for conversion from employment lands to residential uses are removed from the potential residential supply.

Among the reasons for these conclusions are:

- The analyses of community/residential land needs by the Region of York, Hemson Consulting Ltd., and the City of Vaughan do not take into account the additional supply of land for single-detached units that will be needed in Vaughan to offset the removal of approximately 1,330 single-detached units from the supply in order to accommodate the Region's projected growth of approximately 2,660 apartments in detached duplexes in Vaughan during 2006-2031.

- The numerous changes that have been made to the supply data by the Region and consultants for the City, and the remaining inconsistencies between the supply data being used by the Region and the City/Hemson cast doubt on the reliability of the supply data. In our experience, these inventories often overstate the potential supply of residential units in a municipality.

- Unlike the Region, Hemson did not add 75 hectares to the community/residential land requirement in the whitebelt to accommodate land for major retail uses.

- The gross residential density of 20 units per gross hectare used to calculate community/residential land requirements in the whitebelt appears to be high for the City's assumed housing mix. Using a density of, for example, 17.5 units per gross hectare would increase the land requirement by about 70 hectares using the City's projected supply shortfall of 9,630 units.

- Differences between the assumptions and information used by the Region and Hemson in their respective analyses of employment land needs suggest that there could be a shortfall of in excess of 137/147 hectares of employment land in Vaughan during 2006-2031. This raises questions about the justification for the recommended conversions of employment lands in Vaughan. If, for example, the proposed conversion of the East Elder Mills lands was not justified or approved, then the residential land supply would be reduced by approximately 62 hectares (according to the Region), which in turn would increase the community/residential land requirement in the whitebelt by approximately 62 hectares.

## BACKGROUND TO CONCLUSIONS

The remainder of this letter presents some of the reasons for the preceding conclusions based on some of the key findings arising from our review of the following documents:

- York Region Planning and Development Services, *York Region 2031 Land Budget*, January 2009

- York Region Planning and Development Services, *York Region 2031 Land Budget*, March 2010 [referred to hereafter as *March 2010 York Region Land Budget*]

- Hemson Consulting Ltd., *Housing Analysis and Employment Land Needs*, September 2009 [referred to hereafter as *September 2009 Hemson Report*]

- Hemson Consulting Ltd., *Housing Analysis and Employment Land Needs*, April 2010 [referred to hereafter as *April 2010 Hemson Report*]

- Urban Strategies Inc., *Where & How to Grow*, June 2009

- *Official Plan Review, City-Wide Policies, File 25.1*, Report of the Commissioner of Planning to Vaughan Committee of the Whole (Public Hearing), May 17, 2010 [referred to hereafter as *May 17, 2010 Committee of the Whole Report*]

## Treatment of Apartments in Detached Duplexes

In the *March 2010 York Region Land Budget,* the Region projects growth of 9,065 apartments in detached duplexes (the Census of Canada term for secondary or accessory suites, hereafter referred to as detached duplexes), which the Region assumes will occur in the *designated greenfield area.* Detached duplexes are typically created when an accessory or secondary suite is created within an existing single-detached unit.[1] When an accessory suite is created in a single-detached unit, both units (i.e., the original single-detached unit and the accessory suite) are supposed to be classified as apartments in a detached duplex. While detached duplexes can also be created theoretically by building a new dwelling with two detached duplexes, this is not common in the Greater Toronto Area.

Assuming that accessory suites are only created in existing dwellings, the projected growth of 9,065 units in detached duplexes in the Region of York as a whole (approximately 2,660 units in Vaughan) would reduce the potential supply of single-detached dwellings by approximately 4,533 units in the Region as a whole and 1,330 units in Vaughan, because once an accessory suite is created within an existing single-detached dwelling, whether the single-detached dwelling existed at the time of the 2006 Census or is built after the 2006 Census, it is no longer a single-detached dwelling. Since the projected growth in single-detached dwellings is already net of detached duplexes, this means that an additional supply of 1,330 single-detached units would be needed during 2006-2031 in Vaughan to replace the 1,330 single-detached units that would be removed from the supply as the 2,660 detached duplexes are created. This has not been accounted for in either the *March 2010 York Region Land Budget*, the *April 2010 Hemson Report* or the *May 17, 2010 Committee of the Whole Report*, meaning that there is a need for additional community/residential land to accommodate an additional 1,330 single-detached units over and above any residential supply shortfall identified in these reports.

The assumption that these units would all be accommodated in the *designated greenfield area* is not substantiated, since many of these units would typically be created within the existing stock of older homes in the *built-up area*. Indeed, Section 2.2.3.6j) of the *Growth Plan for the Greater Golden Horseshoe (Growth Plan)* specifically "encourage[s] the creation of secondary suites throughout the *built-up area*." In any event, even if all of the growth in detached duplexes during 2006-2031 occurred in the

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[1] When an accessory suite is created in a semi-detached or row unit, the Census of Canada classifies these units as low-rise apartments.

*designated greenfield area*, this would reduce the potential supply of single-detached units in the *designated greenfield area* by 1,330 units because the detached duplexes would have to be accommodated by creating accessory suites in single-detached units completed during 2006-2031, which would then remove those single-detached units from the supply.

## Potential Residential Land Supply Within the Existing Urban Area Boundary

The *March 2010 York Region Land Budget* and the *April 2010 Hemson Report* contain various revisions to the residential supply data for the *designated greenfield area* in Vaughan compared with the 2009 versions of these reports but with little or no explanation. Figure 1 compares the potential supply of residential units as of 2006 within the existing urban area boundaries in Vaughan by dwelling type between the *March 2010 York Region Land Budget* and the *April 2010 Hemson Report*. There are unexplained differences between the data in the Region's report versus the Hemson report. Since the potential supply of residential units within the existing urban area boundaries impacts the number of residential units that would need to be accommodated on community/residential lands within the whitebelt, it is important to have reliable data on the potential supply of residential units within the existing urban area in Vaughan by dwelling type.

**Figure 1** **Potential Residential Supply by Dwelling Type Within the Existing Urban Area, City of Vaughan**

| | Single & Semi-Detached | Row | Apartment | Total |
|---|---|---|---|---|
| | | *Households* | | |
| **Inside Built Boundary** | | | | |
| March 2010 York Region Land Budget [1] | 2,310 | 4,380 | 24,920 | 31,610 |
| April 2010 Hemson Report | 2,320 | 7,170 | 24,340 | 33,830 |
| **Designated Greenfield Areas** | | | | |
| March 2010 York Region Land Budget | 18,710 | 4,020 | 3,140 | 25,870 |
| April 2010 Hemson Report | 18,250 | 3,790 | 9,590 | 31,630 |
| **Sub-Total** | | | | |
| March 2010 York Region Land Budget | 21,020 | 8,400 | 28,060 | 57,480 |
| April 2010 Hemson Report | 20,570 | 10,960 | 33,930 | 65,460 |

[1] Units inside the built boundary are calculated residually

Source: Altus Group Economic Consulting based on Hemson Consulting Ltd., *Housing Analysis and Employment Land Needs*, April 2010, Table 4; and York Region Planning and Development Services, *York Region 2031 Land Budget*, March 2010, Tables 1, 3 and 5

The numerous changes that have been made to these supply data by the Region of York and consultants for the City of Vaughan (Hemson Consulting Ltd. and Urban Strategies Inc.) during the *Growth Plan* conformity exercises of the Region and City, respectively, and the remaining inconsistencies between the most recent published supply data being used by the Region and the City/Hemson cast doubt on the reliability of the supply data in the absence of full disclosure of a more detailed supply inventory. Based on our considerable experience reviewing residential supply inventories prepared by/for municipalities, we have found that these inventories often overstate the potential supply of residential units.

## Community/Residential Land Requirements in the Whitebelt

### *Community/Residential Land Requirements in the Whitebelt for Major Retail Uses*

The *September 2009 Hemson Report* did not translate the projected residential unit supply shortfall in Vaughan into hectares of community/residential land required in the whitebelt (i.e., outside the existing urban area boundary). The *April 2010 Hemson Report* does calculate community/residential land requirements in the whitebelt. Similar to the *March 2010 York Region Land Budget*, the *April 2010 Hemson Report* divides the total residential unit supply shortfall within the existing urban area boundary of 9,630 units by a density of 20 units per gross hectare, yielding a need for approximately 480 gross hectares of community/residential land in the whitebelt. However, whereas the Region also added 75 hectares to the community/residential land requirement in the whitebelt to accommodate land for major retail uses, Hemson did not. The *April 2010 Hemson Report* provides no explanation for this omission. If the 75 hectares being used by the Region of York is added to Hemson's calculated community/residential land requirement in the whitebelt of 480 hectares, the total community/residential land requirement in the whitebelt would be 555 hectares instead of 480 hectares. This exceeds the 480 hectares that are purported by Hemson to be contained within the proposed community/residential urban boundary expansion areas in Vaughan.

The *May 17, 2010 Committee of the Whole Report* states that:

> Major Retail uses – those over 10,000 square metres – will not be permitted in Community Areas or Employment Areas. They are permitted throughout intensification areas subject to a Zoning By-law Amendment but must be justified subject to a specific study.

Neither the *April 2010 Hemson Report* nor the *May 17, 2010 Committee of the Whole Report* provides justification for deviating from the Region's approach. Furthermore, these reports do not demonstrate that the major retail space that the Region proposes to accommodate in the community/residential whitebelt lands can be physically accommodated in intensification areas, that such intensification is economically viable, that there would be sufficient market support in intensification areas for this major retail space, or that locating the major retail space in intensification areas will adequately serve the shopping needs of future residents, including those in community/residential whitebelt lands.

***Density Used to Calculate Community/Residential Land Requirements in the Whitebelt***

The *March 2010 York Region Land Budget, April 2010 Hemson Report* and *May 17, 2010 Committee of the Whole Report* each accommodates the intensification target of 29,300 (row and apartment) units within the *built-up area* of Vaughan. The *March 2010 York Region Land Budget* assumes 4,380 row units and 24,920 apartment units, while the *April 2010 Hemson Report* and the *May 17, 2010 Committee of the Whole Report* assume 6,720 row units and 22,580 apartments. Therefore, the growth by dwelling type to be accommodated in the *designated greenfield area* theoretically does not impact on whether or not Vaughan can achieve its assigned intensification target. This means that there is an opportunity in the *designated greenfield area* (including community/residential lands in the whitebelt) to accommodate a mix of housing that takes into account market demand provided that the density target is still achieved.

From June 1, 2006 through April 30, 2010, a total of 8,194 single and semi-detached units were completed in Vaughan, plus another 1,490 single and semi-detached units were under construction as of April 30, 2010, according to CMHC. This represents an average rate of approximately 2,146 single/semi-detached completions per year. If average annual single and semi-detached completions continue at that pace through the next Census period (2011-2016), which may be a conservative assumption given that housing completions in the current Census period have been impacted by the recession and servicing constraints, then the potential supply of single and semi-detached units in Vaughan within the existing urban area boundaries would be depleted before the end of the 2011-2016 Census period. This means that during 2016-2031, essentially all of the growth in single and semi-detached units would have to be accommodated in community/residential lands in the whitebelt. The Region assumes that only 5,220 single and semi-detached units would be accommodated within the community/residential lands in the whitebelt. If the single and semi-detached supply in the existing urban area in Vaughan is exhausted by 2016, then the Region's proposed supply of single and semi-detached units to be accommodated in the whitebelt would limit average annual single and semi-detached housing completions in Vaughan to about 350 units per year, about 84% lower than the pace so far in 2006-2011. Even using the City's proposed supply of 7,700 single and semi-detached units in the whitebelt, average annual single/semi-detached completions in Vaughan during 2016-2031 would be limited to about 515 units per year, about 76% lower than the pace so far in 2006-2011.

It is important to understand that the projected growth in Vaughan during 2006-2031 by dwelling type in the *March 2010 York Region Land Budget*, the *May 17, 2010 Committee of the Whole Report* and possibly the *April 2010 Hemson Report* is largely supply-driven, in particular for single and semi-detached units. In each of the three reports, it is assumed that the remaining potential supply of single and semi-detached units within the existing urban area boundary in Vaughan will be fully built out during 2006-2031, hence the growth of single and semi-detached units within the existing urban area boundary equals the estimated remaining potential supply. For the community/residential lands in the whitebelt, the growth by dwelling type is determined by assigning a housing mix to those lands, rather than projecting growth by dwelling type for the City as a whole independently from the supply analysis and then subtracting the potential supply by dwelling type within the existing urban area to calculate the housing requirements by dwelling type to be accommodated within the whitebelt.

All three reports also identify a need for additional community/residential land to be accommodated in the whitebelt, but each one uses a different mix of housing for these lands as indicated in Figure 2. All three reports use a density of 20 units per gross hectare to calculate community/residential land requirements in the whitebelt. However, while a density of 20 units per gross hectare may be appropriate for the Region's housing mix, which includes 30% row units and 10% apartment units, 20 units per gross hectare appears to be high for the City's assumed mix of 80% single and semi-detached units and 20% row units.

The *March 2010 York Region Land Budget* assumes a density target of 70.1 persons and jobs per hectare in the community/residential lands in the whitebelt in Vaughan. The Region assumes that 40% of the units on these lands will be row and apartment, which have lower average household sizes than single and semi-detached units. Using the housing mix in the *May 17, 2010 Committee of the Whole Report* of 80% single/semi-detached and 20% row units for the community/residential lands in the whitebelt, but with a density of, for example, 17.5 units per hectare, it may still be possible to achieve the density target because the average household size would be higher.

Using a lower, but more realistic, density of, for example, 17.5 units per gross hectare would increase the community/residential land requirement in the whitebelt from about 480 hectares to about 550 hectares using the *May 17, 2010 Committee of the Whole* supply shortfall of 9,630 units.

**Figure 2**

**Proposed Residential Units by Dwelling Type to be Accommodated on Community/ Residential Lands in the Whitebelt, City of Vaughan**

| | Single & Semi-Detached | Row | Apartment | Total |
|---|---|---|---|---|
| | | *Households* | | |
| March 2010 York Region Land Budget | 5,220 | 2,610 | 870 | 8,700 |
| April 2010 Hemson Report | 6,260 | 3,370 | 0 | 9,630 |
| May 17, 2010 Committee of the Whole Report | 7,700 | 1,930 | 0 | 9,630 |
| | | *Percent* | | |
| March 2010 York Region Land Budget | 60.0 | 30.0 | 10.0 | 100.0 |
| April 2010 Hemson Report | 65.0 | 35.0 | 0 | 100.0 |
| May 17, 2010 Committee of the Whole Report | 80.0 | 20.0 | 0 | 100.0 |

Source: Altus Group Economic Consulting based on Report of the Commissioner of Planning to Vaughan Committee of the Whole (Public Hearing), *Official Plan Review City-Wide Policies, File 25.1*, May 17, 2010, Table 2; Hemson Consulting Ltd., *Housing Analysis and Employment Land Needs*, April 2010, Table 8; and York Region Planning and Development Services, *York Region 2031 Land Budget*, March 2010, Table 5

## Proposed Conversion of Employment Lands

The *March 2010 York Region Land Budget*, the *April 2010 Hemson Report* and the *May 17, 2010 Committee of the Whole Report* all conclude that the projected employment growth in Vaughan during 2006-2031 can be more or less accommodated within the existing urban area plus the Highway 400 North Employment Area, which is the subject of an upcoming Ontario Municipal Board hearing. However, there are differences between the supply data being used by the Region compared with Hemson and the City of Vaughan as illustrated in Figure 3.

Excluding the Highway 400 North Employment Area, the *April 2010 Hemson Report* and the *May 17, 2010 Committee of the Whole Report* assume that the total capacity of designated employment lands in Vaughan is either 3,380 or 3,370 net hectares, respectively. In contrast, the *March 2010 York Region Land Budget* assumes that the total capacity of designated employment lands is approximately 3,297 net hectares (3,280 net hectares plus 16.9 net hectares of land that the Region excluded from the supply to account for growth in major office employment on employment lands). The difference between the Region's figure and the Hemson/City figures is approximately 83 or 73 hectares, respectively. A small portion of this difference is likely due to the Region excluding existing major office employment on employment lands from its inventory. However, Hemson and the City have excluded from the employment lands supply various lands that are being recommended for conversion to uses other than employment lands. In contrast, the Region appears to have only excluded approximately 62 hectares in East Elder Mills. Therefore, the differences between the two sets of data for the total capacity of designated employment lands are likely greater than 73/83 hectares, but the magnitude of the difference cannot be easily measured since neither Hemson nor the City provide areas for the lands being recommended for conversion.

**Figure 3** **Estimated Capacity of Employment Lands, City of Vaughan**

| | March 2010 York Region Land Budget | April 2010 Hemson Report | May 17, 2010 Committee of the Whole Report |
|---|---|---|---|
| | | *Net Hectares* | |
| Occupied Employment Lands, 2006 | 2,077 | n.a. | n.a. |
| Occupied Employment Lands, 2008 | n.a. | 2,480 [1] | 2,480 [1] |
| Vacant Designated Employment Lands, 2006 | 1,203 | n.a. | n.a. |
| Vacant Designated Employment Lands, 2008 | n.a. | 900 [1] | 890 [1] |
| Vacant Designated Employment Lands to be used for Major Office Employment | 17 | n.a. | n.a. |
| Total Capacity of Designated Employment Lands | 3,297 | 3,380 [1] | 3,370 [1] |
| Highway 400 North Employment Area Lands | 300 | 340 | 340 |

[1] Includes small amount of land to accommodate growth in major office employment on employment lands.

Source: Altus Group Economic Consulting based on Report of the Commissioner of Planning to Vaughan Committee of the Whole (Public Hearing), *Official Plan Review City-Wide Policies, File 25.1*, May 17, 2010, Table 5, Hemson Consulting Ltd., *Housing Analysis and Employment Land Needs*, April 2010, Table 12 and; York Region Planning and Development Services; *York Region 2031 Land Budget*, March 2010, Tables 8, 9, 14 and Appendix 6

The *April 2010 Hemson Report* and the *May 17, 2010 Committee of the Whole Report* assume that the Highway 400 North Employment Area comprises 340 net hectares of employment land, whereas the *March 2010 York Region Land Budget* assumes that the area comprises 375 gross hectares, which translates to 300 net hectares. The Region, Hemson and the City all conclude that the lands in the Highway 400 Employment Area will be needed to accommodate employment land needs through to 2031. If the Region's number is correct, then the supply shortfall identified by Hemson and the City would increase by 40 net hectares (50 gross hectares). Although Hemson and the City identify only a very small shortfall of 24 net hectares (30 gross hectares) of employment lands for the 2031 time horizon, the shortfall could be in excess of 137/147 net hectares (171/184 gross hectares) using the Region's data for the total capacity of designated employment lands plus the lands in the Highway 400 North Employment Land Area.

The preceding findings raise questions about the justification for the recommended conversions of employment lands in Vaughan. If, for example, the conversion of the East Elder Mills lands was not justified or approved, then the residential land supply would be reduced by approximately 62 hectares (according to the Region), which in turn would increase the community/residential land requirement in the whitebelt by approximately 62 hectares.

## SUMMARY OF CONCLUSIONS

Taking all of the above into account, and in the absence of more detailed information from the Region of York and City of Vaughan, our preliminary conclusions are that:

- The proposed urban area boundary expansions in Vaughan are insufficient to accommodate the projected population growth during 2006-2031 allocated by the Region of York to the City of Vaughan; and

- Additional community/residential lands in the whitebelt should be included within an expanded urban area in Vaughan beyond the lands proposed to be included in proposed Amendment No. 2 to the Official Plan for the Regional Municipality of York, and the draft New Vaughan Official Plan. This includes land to accommodate approximately 1,330 additional single-detached units related to the projected growth in apartments in detached duplexes, 75 hectares of land for major retail uses, approximately 70 hectares to accommodate the supply shortfall of 9,630 units identified by the City at a density of 17.5 units per gross hectare rather than 20 units per gross hectare, plus approximately 62 hectares if the employment lands in East Elder Mills are not redesignated to permit residential uses as proposed. There may also be additional community/residential lands required in the whitebelt if it is confirmed that there is an overstatement of the potential housing supply within the existing urban area, and/or if other lands proposed for conversion from employment lands to residential uses are removed from the potential residential supply.

Sincerely,

Robert Feldgaier

Robert Feldgaier, M.Sc.Pl.
Senior Director
Economic Consulting

cc: Mr. Gerard Borean - Parente, Borean LLP

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