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planning + urban design

Regional Municipality of York
Planning and Economic Development
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September 23, 2020
File 6715

Attn: Paul Freeman, Chief Planner

**RE: Municipal Comprehensive Review Comment Submission
7553 Islington Avenue & 150 Bruce Street, City of Vaughan
Intensification Background Report (April 2019)
Major Transit Station Areas Update Report (March 2020)
Major Transit Station Areas Endorsement Report (August 2020)**

Weston Consulting is the planning consultant for the registered owners (7553 Islington Holding Inc.) for the lands municipally addressed as 7553 Islington Avenue & 150 Bruce Street, in the City of Vaughan (herein referred to as the 'subject lands'). We are actively engaged by the landowners on various planning matters, including the monitoring of York Region's Municipal Comprehensive Review (MCR) process.

We provide this letter subsequent to previous communications that have been submitted to York Regional staff on December 18, 2019, as a response to the Region's *Planning for Intensification Background Report (2019)*, Major Transit Station Areas Update Report (March 2020), and Major Transit Station Areas Endorsement Report (August 2020).

It is our understanding that the Region's objectives during the Municipal Comprehensive Review (MCR) include evaluating the current regional intensification framework, MTSA delineations, and minimum density targets to accommodate and align with the 2041 planning horizon intensification targets within the Growth Plan for the Greater Golden Horseshoe (2019).

Furthermore, we have reviewed the Region's latest Major Transit Station Areas Endorsement Report which will proceed to Regional Council for endorsement at the upcoming September 24, 2020 Regional Council meeting. We understand that the report has proposed updated boundaries and density targets for all 72 MTSA's in the Region. Additionally, we acknowledge that York Regional staff will be following up with City of Vaughan staff in assessing the potential to include the subject lands within the draft MTSA boundary. As such, this letter formally requests that the subject lands be included within the proposed delineated area for the *Wigwoss-Helen* MTSA as the subject lands are located within the 500 to 800 metre radius (see Figure 1). Currently, the subject lands remain outside of the updated *Wigwoss-Helen* MTSA boundaries.

As per our correspondence with Regional staff on March 9, 2020, we have been made aware that the upcoming staff report on MTSAs, planned for Fall 2020, will propose updated boundaries and density targets for all 72 MTSAs in the Region. Additionally, we acknowledge that York Regional staff will be following up with City of Vaughan staff in assessing the potential to include the subject lands within the draft MTSA boundary. As such, this letter formally requests that the subject lands be included within the proposed delineated area for the *Wigwoss-Helen* MTSA as the subject lands are located within the 500 to 800 metre radius (see Figure 1).

The future redevelopment anticipated on the subject lands will accommodate higher densities and support the proposed intensification framework and minimum density targets, as per the Region's March 2019 Intensification Background Report. The owners intend to provide further justification and support for the redevelopment of the lands throughout the MCR, through written correspondence, additional studies and reports (if required), and the local land use planning process in facilitating the proposed development.

York Region staff previously noted that the subject lands were 'non developable' per its land use designation (*Natural Areas*) in Schedule 13 – Land Use of the City of Vaughan Official Plan (2019 Office Consolidation). We would like to clarify that although we acknowledge its current land use designation and the policies, which protect natural features on lands designated as such, the technical studies, notably an Environmental Impact Study prepared by WSP, support our position that the proposed development could be facilitated via an Official Plan Amendment (City File OP.08.017) and Zoning By-Law Amendment (City File Z.16.008) without significant environmental impacts to its surroundings. To further elaborate, the subject lands were historically designated as *Low Density Residential* and *Open Space* in the Woodbridge Community Plan (OPA 240), which predated the City's Official Plan. The subject lands had been previously developed for low-density residential uses and now currently sit vacant. It is our intention to develop the low-density residential portion of the subject lands, while ensuring that no significant environmental impacts result from the development, which our technical studies support. To date, we have had continuing discussions with the City of Vaughan and the Toronto and Region Conservation Authority regarding the site's environmental conditions in the context of the proposed development.

We would also like to note that the Natural Heritage System (NHS) mapping overlaid on the site per Schedule 2 of the City's Official Plan and its policies are under appeal by our client. As a result, the site does not yet form part of the local natural heritage system, with the effect being that the Region has the ability to modify the land use designation and policies applicable to the site without restraint from its NHS overlay mapping.



Figure 1 – Subject Lands and proposed Wigwoss-Helen BRT Station MTSA

Growth Plan for the Greater Golden Horseshoe (August 2020)

The Growth Plan builds on the PPS to establish a unique land use planning framework for the Greater Golden Horseshoe (GGH) that supports the achievement of complete communities, a thriving economy, a clean and healthy environment, and social equity. When the Region’s 2019 report was written, the previous Growth Plan for the Greater Golden Horseshoe (2017) stated that MTSA’s generally should be a 500-metre circular radius around the higher order transit station or stop. The most recent version of the Growth Plan came into effect on May 16, 2019, expanding the radius of the MTSA and providing further policy direction on matters of regional interest related to land use planning and development as it pertains to the subject lands. It should be noted that the Growth Plan defines a *Major Transit Station Area* as, “the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.” Amendment 1 to the Growth Plan came into effect on August 28, 2020.

Section 2.2.4 of the Growth Plan (*Transit Corridor and Station Areas*) outlines the following policy direction with regards to MTSA’s:

2.2.4.2 *For major transit station areas on priority transit corridors or subway lines, upper- and single-tier municipalities, in consultation with lower-tier municipalities, will delineate the boundaries of major transit station areas in a transit-supportive manner that **maximizes** the size of the area and the number of potential transit users that are within walking distance of the station.*

2.2.4.3 *Major transit station areas on priority transit corridors or subway lines will be planned for a minimum density target of:*

b) 160 residents and jobs combined per hectare for those that are served by light rail transit or bus rapid transit; or

2.2.4.5. *Notwithstanding policies 5.2.3.2 b) and 5.2.5.3 c), upper- and single-tier municipalities may delineate the boundaries of major transit station areas and identify minimum density targets for major transit station areas in advance of the next municipal comprehensive review, provided it is done in accordance with subsections 16(15) or (16) of the Planning Act, as the case may be.*

2.2.4.9. *“Within all major transit station areas, development will be supported, where appropriate, by:*

- a) planning for a diverse mix of uses, including second units and affordable housing, to support existing and planned transit service levels;*
- b) fostering collaboration between public and private sectors, such as joint development projects;*
- c) providing alternative development standards, such as reduced parking standards; and*
- d) prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities.”*

2.2.4.10. *Lands adjacent to or near to existing and planned frequent transit should be planned to be transit-supportive and supportive of active transportation and a range and mix of uses and activities.*

In addition, policies within section 2.2.4 of the Growth Plan provide guidance for accommodating growth within MTSA's. The following points summarize key policy directives:

- Maximize the size of the delineated MTSA area and the amount of transit users that are within walking distance;
- State a minimum density of residents and jobs per hectare within the 500-800 metre radius;
- Identify minimum density targets within the delineated MTSA area and prohibiting low density land uses and built form that run contrary to achieving minimum density;
- Plan for a diverse mix of uses;
- Plan for transit-supportive uses and activities; and,
- Delineate the boundaries of MTSA's and identify minimum density targets for MTSA's in advance of the next MCR.

In our opinion, the subject lands adhere to Growth Plan policy criteria as they are located within a 500 to 800-meter radius of an MTSA, and are therefore suitable for intensification. The proposed development will result in the addition of 530 residential units within the MTSA, helping the City to maximize the number of transit users within walking distance of the *Wigwoss-Helen MTSA*. The proposed apartment units will contribute to a mix of uses within the MTSA by increasing the range of housing options offered in walking distance of the station. The proposed

development will also maximize the usage of nearby active transportation infrastructure, including a multi-use pathway along Islington Avenue per Figure 4 of the Pedestrian and Bicycle Master Plan (2007).

Furthermore, the existing area surrounding the MTSA is built out at densities lower than what is contemplated by the Growth Plan. As a result, opportunities for redevelopment and intensification on lands within the immediate vicinity of the transit stop are limited and are not expected to drastically change over the planning horizon for the upcoming York Region Official Plan. Accordingly, we are of the opinion the Region must look beyond the immediate area (500m) around the stop in order to meet the density targets. To do so, the Region must be prepared to accept higher densities on lands that are still within the expected distance to the stop, but that may not previously have been viewed as a candidate for intensification, specifically the subject property. It is our opinion that this flexibility is necessary and the only realistic manner in which to optimize municipal investment in local transit infrastructure along this portion of Highway 7.

Region of York's 2019 Planning for Intensification Background Report:

The Region's Report provides background and a framework for developing intensification targets for the Regional Municipality of York and proposes a new framework to appropriately position itself to meet Growth Plan intensification targets. However, the Growth Plan has since been the subject of a number of revisions which must be accounted for.

When the Region's 2019 report was written, the previous Growth Plan for the Greater Golden Horseshoe (2017) stated that MTSA's generally should be a 500-metre circular radius around the higher order transit station or stop. Notwithstanding, York Region proposed new fixed limit boundaries, which stemmed from the Region's *Draft Guidelines to Delineate and Set Density Targets for Major Transit Station Areas*. These are supported by the updated policy within the new Growth Plan. The new MTSA's, proposed by York Region, would more appropriately address local land use planning contexts.

The new MTSA boundaries reflect the following criteria and principles established within the Draft Guidelines:

- *Reinforce the planned regional and local municipal urban structure;*
- *Support the opportunity to provide diversity, range and mix of land uses;*
- *Incorporate existing higher density land uses;*
- *Include areas that are anticipated or ideally situated to develop or redevelop to higher densities;*
- *Connect with adjacent MTSA's so that as much of the priority transit are included, as possible;*
- *Walkable communities;*
- *Collectively support the creation of complete communities for the broader community beyond the MTSA boundaries;*
- *Collectively provide a range of amenities (e.g., parks, schools, cultural facilities, retail, etc.); and*

- *Collectively provide opportunities to live and work along the priority transit corridors.*

The draft MTSA targets are not meant to be applied on a site-by-site basis, rather, the forecasted rates are applicable to the area as a whole, so that they not preclude high density targets per the Growth Plan. Furthermore, the Report notes that once delineations and minimum density targets are finalized through the Region of York's Intensification Strategy, anticipated to be released in 2020, the lands within MTSA's, including the subject lands(if they are included within the *Wigwoss-Helen BRT MTSA*), will be '*protected from land use planning appeals relating to height and density*', as per Section 16 of the Planning Act.

Policy 2.2.4.5, which previously allowed municipalities to average minimum density targets for MTSA's along the same *Priority Transit Corridor*, was removed as part of the latest updates to the Growth Plan. These changes instantiate a need to revisit the draft *Wigwoss-Helen BRT MTSA* boundaries.

Weston Consulting is of the opinion that the new *Wigwoss-Helen BRT MTSA* boundaries are in need of revisions to better address the local land use planning context, while addressing and achieving intensification and growth in proximity to the MTSA, in addition to aiding the *Corridor's* intensification targets. Specifically, we are of the opinion that the subject lands would be an appropriate addition to the MTSA.

We are of the opinion that the proposed development on the subject lands will aid the MTSA in achieving its new density and intensification targets, as identified by the Regional Municipality of York through its current Municipal Comprehensive Review process. Seeing as the lands in proximity to the BRT Station do not meet the current and proposed average density targets, intensification on the subject lands and adjacent lands within the new MTSA are to be supported by the proposed development. The addition of the subject lands within the proposed MTSA boundary will ensure a more appropriate alignment with Provincial and Municipal policy framework and is expected to reflect the anticipated intensification within *Centres and Corridors*.

As per the Region's Intensification Strategy Report, the Region of York acknowledges that intensification will largely be accommodated in the form of apartment units, even though the Region's overall housing stock remains concentrated in lower density housing forms. Higher forms of density are anticipated to address a number of issues that affect the Region, and the proposed development on the subject lands will directly address intensification and growth within the Region. The proposed high-density residential development on the subject lands will contribute to the development of a more balanced Regional housing stock with a greater variety of housing types. This will increase the overall housing mix, provide more affordable housing opportunities and solutions to the Region's aging population, reduce automobile dependency, promote active forms of transportation, increase access and accessibility to transit, and continue investment in transit, community facilities, amenities, and quality built-environments beyond the 2041 planning horizon.

In addition to the above, the Region's Intensification Strategy Report directly speaks to the applicability for intensification on the subject lands.

“The Region of York has outlined that intensification is already in place with the Centres and Corridors framework in the [Regional Official Plan(ROP)], and the local municipal intensification strategies and policies within each of the nine local municipalities.”

The subject lands are anticipated to appropriately address intensification, as it is strategically located adjacent to a *Corridor*, which will accommodate the highest rates of intensification and growth throughout the Region. The subject lands will maximize efficiencies in infrastructure delivery, human services provision, and transit ridership. The proposed development will be connected to Regional and Urban Growth Centres, and places of economic and cultural importance. These areas include the Vaughan Metropolitan Centre, Richmond Hill Centre/Langstaff Gateway, Newmarket Centre, and other centres within different regions, provinces and countries that will be connected through the higher-order transit system accessible from the proposed development.

The Regional Municipality of York is currently consulting stakeholders on the proposed intensification framework, MTSA, and additional strategic growth area delineations and minimum density targets. Weston Consulting requests that the Region continue to inform the owners of the subject lands during its public consultation efforts, to ensure that the scope of the intensification of the subject lands is captured during this process.

Weston Consulting acknowledges that the Region’s Report provides background work leading to the development of the full York Region Intensification Strategy. This will be followed by an Official Plan update. The Region’s Intensification Strategy will include the local municipal intensification targets, proposed final MTSA and minimum density targets, policy direction for updating the ROP based on the Growth Plan policies, as well as an implementation strategy for the Region and local municipalities.

In summary, we request that the *Wigwoss-Helen BRT MTSA* boundaries be expanded to include the subject lands in time for the release of the Region’s full intensification strategy. Additionally, we request that the Region continue to inform us of any progress on the Intensification Strategy 2020, as well as any opportunity for stakeholder input and engagement.

Should you have any questions, please contact the undersigned at extension 320 or Steven Pham at extension 312.

Yours truly,
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