

Whitby Mature Neighbourhood Study

Response Matrix for Comments and Submissions Received

Agency Comments				
Date Received	Format	From	Comment	Response
	Email	Town of Whitby Urban Design	<ul style="list-style-type: none">It might be helpful to include a reference to the overlapping boundaries between the Secondary Plan and Mature Neighbourhood – showing the relationship between Secondary Plan Areas and Mature Neighbourhoods and acting as a reminder to refer to relevant policies.Is there a reference to the hierarchy between the Secondary Plan and the Mature Neighbourhood policies? If there is a discrepancy, which section would override? For example, Downtown Whitby permits max 6 storeys for HD residential, whereas the Mature Neighbourhood policies permits 4 storeys.	<ul style="list-style-type: none">The Downtown Whitby Secondary Plan delineates Low Density Mature Neighbourhoods on Schedule H. The policies of the Secondary Plan specify lands designated Low Density Mature Neighbourhoods shall be developed in accordance with the policies of Section 4.4.3.4 (New Mature Neighbourhoods Section).Proposed Policy 4.4.3.13.2 states that notwithstanding any other provisions of the Official Plan, in instances where the policies and designations of the Official Plan (including Secondary Plans) vary from the Mature Neighbourhood policies, the Mature Neighbourhood policies will prevail.
	Email	Town of Whitby Sustainability and Climate Change	<ul style="list-style-type: none">The proposed Official Plan Amendment aligns with the Culture and Community Sustainable Design principle of Whitby Green Standard which focuses on nurturing local identity and heritage.The policies included to minimize the loss of mature trees and the need to consider the maintenance of existing mature trees will help protect the cultural heritage of mature neighbours and aligns with the Land Use and Nature Sustainable Design principle of Whitby Green Standard which focuses on protecting land for the benefit of people and wildlife.The following policies of Section 4.4.3.13.17 of the proposed Official Plan Amendment regarding applications for High Density Residential development greater than 4-storeys in in Mature Neighbourhoods support specific criteria of the Whitby Green Standard:<ul style="list-style-type: none">Development should be located close to existing or planned transit routes.Development should be located in areas where community services and amenities are within walking distance.With the above in mind, the Sustainability Division is supportive of the Draft Proposed Official Plan Amendment (OPA-2021-W/02) Mature Neighbourhoods Study and appreciate the opportunity for review.	<ul style="list-style-type: none">Noted. Thank you.
	Email	Town of Whitby Landscaping	<ul style="list-style-type: none">Within Policy 4.4.3.13.14, consider substituting the word “maintenance” which implies “caring for” or “looking after” with “preservation” or “protection” to be consistent with policy language used elsewhere.Within Policy 4.4.3.13.15, consider removing “as well as the loss of mature trees” and revising to “existing mature trees” – the goal is to	<ul style="list-style-type: none">Wording will be changed to: <u>“Protection of mature trees”</u>.Wording will be changed to the following: “New development shall minimize impacts to adjacent and surrounding properties in relation to privacy, overlook, shadowing, sun reflection, and

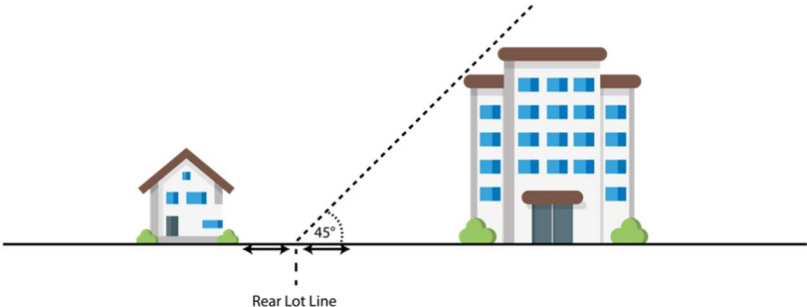
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			minimize impacts to trees versus minimizing impacts to loss of trees (which could imply it best to remove mature trees).	access <u>and existing mature trees</u> as well as loss of mature trees.
December 21, 2022	Email	Town of Whitby Engineering	No comments.	<ul style="list-style-type: none">Noted. Thank you.
January 17, 2023	Letter Via Email	Region of Durham	<p>Living Areas, Regional Centres, and Regional Corridors</p> <ul style="list-style-type: none">Lands within the Living Areas designation shall be developed with a mix of housing types, size and tenure to meet the diverse housing needs of the residents of Durham Region.High density mixed-use developments are encouraged to locate within the Regional Centres designation and adjacent to Regional Corridors and arterial roads to support intensification and efficient transit services, as determined appropriate by the area municipalities. Lands located along Regional Corridors shall be protected for transit-supportive densities to promote pedestrian-friendly urban environment supporting active modes of transportation including walkable communities and cycling. Development proposals within these designations should support residential intensification to achieve the Region’s density targets and to optimize existing infrastructure and public services facilities. <p>Region’s Cultural Heritage Resources</p> <ul style="list-style-type: none">The Study Area contains historic communities with cultural heritage significance that should be conserved. The proposed amendment provides policies that would maintain character of the mature neighbourhoods to protect cultural heritage resources. The Region supports preserving and fostering the attributes of communities and the historic and cultural heritage of the Region. We encourage cultural heritage policies which support preserve, improve, rehabilitate or redevelop older residential areas where there is cultural heritage value.We recognize that the proposed amendment does not deter or preclude higher densities to be accommodated along Regional Corridors and arterial roads as contemplated by the ROP. Proposed land uses within the Study Area will be evaluated to meet the development criteria of the Study. The proposed amendment contributes to preserving and enhancing the character of residential communities to create a strong sense of place for community residents.	<ul style="list-style-type: none">The proposed OPA meets the intent of the Region’s land use structure including providing for a mix of housing permissions within Living Areas, as well as focusing intensification towards Regional Centres and Corridors, as well as arterial roads.Noted. Thank you.

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			<ul style="list-style-type: none"> The proposed amendment will help streamline the review of new infill developments or redevelopment proposals to ensure that developments reflect the character of the surrounding neighbourhoods. The proposed amendment supports infill and intensification within the Mature Neighbourhoods' boundary where development proposals are in keeping with the existing character of the neighbourhoods. The proposed amendment identifies areas where low density, medium and high densities are supported, and generally aligns with the policy directions of the ROP. The proposed amendment conforms with the ROP. <p>Provincial Policy Statement</p> <ul style="list-style-type: none"> The Provincial Policy Statement (PPS) supports providing a full range of housing and densities to meet current and future housing needs of the residents of Durham Region. The PPS encourages land use patterns be based on densities and mix of land uses which efficiently use land and resources and are appropriate and efficiently use infrastructure and public services facilities which are planned or available, and support active transportation and are transit-supportive. The proposed amendment is intended to manage appropriate locations within the Mature Neighbourhood boundary for future growth. The proposal supports a diverse mix of housing choices and promotes higher densities within transportation corridors to promote transit and to efficiently optimize the use of public infrastructure. <p>Growth Plan</p> <ul style="list-style-type: none"> The Growth Plan supports building healthy and balanced communities and providing a full range of housing to accommodate a range of incomes and household sizes and the use of active transportation. The Growth Plan encourages the development of complete communities to support quality of life and human health and encouraging the development of age-friendly communities. Communities built should provide high quality public open space, parkland recreation, and access to local and healthy food. The proposed amendment supports a diverse mix of housing options and promotes transit-supportive communities by supporting higher densities adjacent to transportation corridors. The proposed amendment focuses on managing growth within the Mature Neighbourhoods boundary and emphasizes orderly development patterns. The proposed amendment conforms with the Growth Plan. 	<ul style="list-style-type: none"> Noted. Thank you. Noted. Thank you.

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			<p>Transportation</p> <ul style="list-style-type: none">The Mature Neighbourhood boundary is located within a 5-10 minute walk (500-800 metres) from the Whitby GO Major Transit Station Area, Highway 2 Rapid Transit Spine, and High Frequency Transit Networks along Brock Street, Rossland Road, and Taunton Road. As the Mature Neighbourhood boundary is located in proximity to existing or proposed transit stops or stations in this area, it is recommended that the proposed amendment or related proposed Urban Design Guidelines include general reference to the promotion of an inviting and pedestrian oriented public realm to enhance connectivity to public transit and active transportation connections and amenities such as cycling routes, sidewalks, and trails. <p>Exemption Status</p> <ul style="list-style-type: none">The proposed amendment implements the recommendations of the Mature Neighbourhood Study and will provide planning policies to guide development in specific locations within the boundary of the mature neighbourhoods study area. The proposed amendment is intended to manage urban growth to maintain the character of mature neighbourhoods by encouraging higher density developments to locate adjacent to Regional Corridors and arterial roads. The proposed amendment generally conforms with Regional Official Plan.The proposed amendment does not represent any Regional and/or Provincial concerns and would be exempt from Regional approval.	<ul style="list-style-type: none">The OPA directs higher density towards transit routes and stops. Its intent is to direct built form and site design that enhances the identity of existing residential neighbourhoods. There are other policies located throughout the Official Plan and Downtown Secondary Plan that speak to the design of the public realm and public transit and active transportation connections. Development of the future Town-wide Urban Design Guidelines will take this comment into consideration.Noted. Thank you.
December 22, 2022	Email	CLOCA	No comments.	<ul style="list-style-type: none">Noted. Thank you.
November 30, 2022	Letter Via Email	DDSB	No comments.	<ul style="list-style-type: none">Noted. Thank you.
November 30, 2022	Email	Enbridge	No comments.	<ul style="list-style-type: none">Noted. Thank you.
December 5, 2022	Email	Bell	No comments.	<ul style="list-style-type: none">Noted. Thank you.

Public/Development Comments				
Date Received	Format	From	Comment	Response
November 21, 2022 June 6, 2022	Public Meeting Delegation and Letter Letter via Email	Adam Layton, Evans Planning Subject Properties: Icon Taunton Limited - 935 and 945 Taunton Road East, 3557 Garrard Road and Unaddressed Property '0' Garrard Road	<ul style="list-style-type: none">• Pre-consultation has occurred and a development application is being prepared for a variety of townhouse dwellings and a mixed-use component on the properties, similar to the adjacent redevelopment on the east side of Sebastian Street.• A portion of the property is identified within the Mature Neighbourhoods Study Area. The Study explicitly states that the new West Whitby community as well as Employment and Intensification Corridors Areas were excluded from Study.• Based on the context of the site and existing policy framework (designated Mixed Use and within an Intensification Corridor), no portion of the subject property should be subject to the Mature Neighbourhoods Study or any associated future policy revisions.• Matters of compatibility or transition can be appropriately addressed through the future development application process.	<ul style="list-style-type: none">• The property in its entirety will be removed from the Mature Neighbourhoods Study Area.
Sept. 22, 2022 Nov. 21, 2022	Letter Via Email Letter via Email	Mark McConville, Frontdoor Developments (Garrard) Inc. Subject Property: 1.9 ha property located on the east side of Garrard Road between Donald Wilson Street and Eric Clark Drive. (Block 189, Plan 40M-1715, part of Lot 18, Concession 3)	<ul style="list-style-type: none">• The policies of the proposed OPA should not apply to projects where the planning approvals process has already begun or applications have already been submitted. The OPA could include transition or grandfathering policies for sites where planning applications have already been filed.	<ul style="list-style-type: none">• Development applications will be tested against the policy documents in effect at the date of the application.
Sept. 22, 2022 Nov. 21, 2022	Letter via Email Letter via Email	Mark McConville, Frontdoor Developments (Garrard) Inc. Subject Property: 400 Palmerston Avenue	<ul style="list-style-type: none">• The policies of the proposed OPA should not apply to projects where the planning approvals process has already begun or applications have already been submitted. The OPA could include transition or grandfathering policies for sites where planning applications have already been filed.	<ul style="list-style-type: none">• Development applications will be tested against the policy documents in place at the date of the application.

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Nov. 18, 2022	Email	Sheila Thomson 113 Raglan Street	<ul style="list-style-type: none">Resident of a Mature Neighbourhood directly adjacent to an Intensification Corridor with an ongoing concern for what can be built along Dundas Street West.What is the impact to my property in relation to an Intensification Corridor?What does Policy 4.4.13.9 mean?What does “applying a 45-degree angular plane from any property line abutting a low-density residential dwelling” mean? Has it relevance to potential development projects on the Intensification Corridor which abuts my property?	<ul style="list-style-type: none">Dundas Street is identified as an Intensification Corridor. Properties along Dundas Street are outside of the Mature Neighbourhoods Study Area. Section 4.7.2 of the Whitby Official Plan contains existing policies for Intensification Corridors which would apply. According to Policy 4.2.7.3, heights for new residential and mixed use buildings may range from 2 storeys to 8 storeys.Policy 4.4.13.9 states the following: “The prevailing character along the edges of Mature Neighbourhoods (i.e., abutting arterial roads, Intensification Corridors and Intensification Areas) shall not be determinative of the existing character when considering new development in the interior of a Mature Neighbourhood.” This policy notes that the character along the edges of Mature Neighbourhoods may be different than the character in the interior of Mature Neighbourhoods. That character along the edges should not be used to determine the character within the interior of the Mature Neighbourhoods. Development and redevelopment in the interior of Mature Neighbourhoods should consider its direct surroundings and not the building types and densities, lot patterns and other defining character elements of properties along arterial roads and adjacent Intensification Corridors and Areas as greater variation from the existing neighbourhood character is permitted in these instances.The use of a 45-degree angular plane is one of several built form strategies that can help lessen the impact of a taller building on adjacent low rise dwellings and neighbourhoods. A 45 degree angular plane is measured from the adjacent property line of a low rise building to the top of the proposed building. It is one measurable method to ensure the proposed building provides transition down and mitigates impacts such as overlook, privacy and shadowing.

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			<ul style="list-style-type: none">Is Official Plan Policy 4.2.7.3 the only relevant information for me on what can be built on Dundas Street West?	<div></div> <ul style="list-style-type: none">A 45-degree angular plane is not a specific requirement for development on Intensification Corridors, however criteria set out within Policy 4.4.2.9.2 for Redevelopment and Intensification requires development to achieve an appropriate transition of height and density.Partly, Policy 4.2.7.3 sets out what can be developed on Intensification Corridors (including Dundas Street West) which includes a range of building types between 2 and 8 storeys. This policy notes that taller buildings (Medium and High Density Residential development) must also meet the requirements of Section 4.4.3.9.2. However, the Land Use designation for each individual site (Residential, Commercial, Mixed Use) as illustrated on Official Plan Schedule A also dictates what can be developed.

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Nov. 20, 2022	Email	Linda Gasser 111 Ferguson Street	<ul style="list-style-type: none">Work done on this Study predates recent Provincial proposals and does not consider the range of impacts arising from Bill 23. <p>Green Standards</p> <ul style="list-style-type: none">In addition to Architectural Guidelines, there should be a focus on Green Building Standards for new and replacement buildings across Whitby – including within the Mature Neighbourhoods Study Area. Language on the Town’s website around Green Building Standards makes it unclear to determine their status.What planning tools would allow for Architectural Guidelines and Green Standards to be required? If Bill 23 passes as written, Site Plan Control options may be limited. Would Council/Staff consider requiring both Architectural Guidelines and Green Standards via Zoning By-laws? <p>Tree Protection</p> <ul style="list-style-type: none">We must protect our trees – they are an integral component of what makes mature neighbourhoods desirable and liveable – most on private property.Whitby provides no protection for individual trees on private properties on sites less than 0.2 hectares – most lot sizes would be smaller.The Town needs to consider and implement a Tree By-law, expanded to include all private properties to help guide the form of development – especially now that 3 units per property will be considered as-of-right. <p>Housing Affordability</p> <ul style="list-style-type: none">Many of the small bungalows in Mature Neighbourhoods started as very affordable average family housing options. Larger replacement homes are in some cases built to flip and profit at unaffordable prices (e.g. large lot severances that result in two large houses that should be discouraged as they are not only out of character and scale, but often result in mature tree removal and are not affordable).Duplexes and triplexes can take up less lot area, allowing for mature tree preservation and generally more affordable, while also providing for much needed rental units.	<ul style="list-style-type: none">Bill 23 has not imposed any direct impacts to the proposed OPA.The Whitby Green Standard (WGS) applies to Site Plan and Draft Plan of Subdivision applications. It would apply to any of these applications in the study area. The WGS does not apply to other types of development e.g. replacement dwellings.The following motion was carried at the February 27, 2023 Committee of the Whole meeting: That staff report back on the opportunity to protect trees of significance on private lands in order to preserve Whitby’s urban forest canopy.Comments noted. Thank you. The changes imposed by Bill 23 also now allow up to three units in all dwellings.

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Nov. 21, 2022	Letter via Email	Alfiya Kakal, Weston Consulting Subject Property: 38 Elizabeth Crescent	<ul style="list-style-type: none">• The subject property is located at the edge of a Mature Neighbourhood and adjacent to an Intensification Area. Pre-consultation occurred in early 2022 to discuss the proposed four-storey stacked townhouse block comprised of 16 units fronting onto Crawford Street.• OPA Policy 4.4.3.13.11 and 4.4.3.13.12 require appropriate locations for Medium Density and High Density Residential development which is at the edges of Mature Neighbourhoods, along arterial roads and abutting Intensification Corridors or Intensification Areas. However, there are certain locations within the Study Area that would constitute an edge condition but are not specifically along an arterial road that would be appropriate for Medium or High Density Residential development. It is our understanding that Policies 4.4.3.13.11 and 4.4.3.13.12 do not preclude redevelopment on a site that constitutes an edge condition but is not along an arterial road, as long as the site abuts an Intensification Corridor or an Intensification Area.• To provide for additional flexibility in the locational requirements, Policies 4.4.3.13.11 and 4.4.3.13.12 are recommended to be amended such that Medium Density and High Density Residential developments are permitted at the edges of Mature Neighbourhoods along arterial roads and or abutting Intensification Corridors and Intensification Areas.	<ul style="list-style-type: none">• Agreed. Policy 4.4.3.13.11 and 4.4.3.13.12 have been revised to clarify that Medium and High Density Residential development may occur along arterial roads or abutting Intensification Corridors/Areas <i>Policy 4.4.3.13.11: “Medium Density Residential development shall be directed to the edges of Mature Neighbourhoods <u>which includes</u> along arterial roads <u>and or</u> abutting Intensification Corridors <u>or</u> Intensification Areas, <u>and development Development</u> shall be subject to the policies of Section 4.4.3.5 and 4.4.3.9 in addition to this section...”</i> <i>Policy 4.4.3.13.12: “High Density Residential development shall be directed to the edges of Mature Neighbourhoods <u>which includes</u> along arterial roads <u>and or</u> abutting Intensification Corridors <u>or</u> Intensification Areas, <u>and development Development</u> shall be subject to the policies of Section 4.4.3.6 and 4.4.3.9 in addition to this section...”</i>
Nov. 21, 2022	Letter via Email	Rodger Miller, Miller Planning Services Subject Property: 1902 Rossland Road	<ul style="list-style-type: none">• The subject property is located where there are a number of large lots that present opportunities for suitable redevelopment and intensification. Pre-consultation has occurred with plans to demolish the existing structure and provide additional ground-oriented dwellings.• Current plans are considering some additional wide shallow single family lots fronting onto Garrard with single car driveways and typical rear yard depths. The property has the opportunity to produce a number of two storey dwellings.• Concern for the proposed OPA; specifically Policy 4.4.3.13.5, 4.4.3.13.6, 4.4.3.13.8 and 4.4.3.13.14 which may make the current proposal not permissible.• The proposal will not be able to match the lot depths, areas and coverages, density or front yard setback of those lots on either side of them. The Recommendation Report also speaks to maintaining established front yards, lot coverages, etc. in proposed amendments to the Comprehensive Zoning By-law.	<ul style="list-style-type: none">• Rossland Road is an arterial road and therefore greater variation in lot size and existing character is permitted from existing development.• An appropriate transition in height and density can be accommodated in a variety of ways, to be dealt with on a site by site basis.• The intent of the new Mature Neighbourhood policies is to work alongside the existing Redevelopment and Intensification policies of Section 4.4.3.9.2.

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			<ul style="list-style-type: none">Proposed Policy 4.4.3.13.8 suggests a “greater variation from the existing neighbourhood character may be permitted” abutting arterial roads and Intensification Corridors/Area, provided an “appropriate transition in height and density” is created. It is not clear what an appropriate transition would be. Official Plan Policy 4.4.3.9.2.h already provides consideration for redevelopment and intensification proposals.Under the existing Official Plan policies, the applicant must make their case as to the appropriateness of their redevelopment and intensification proposals to be reviewed by Staff (per Section 4.4.3.9.2). The existing policies provide a sound policy basis to protect Mature Neighbourhoods.	
Nov. 21, 2022	Letter via Email	Rodger Miller, Miller Planning Services Subject Property: 780 Garden Street	<ul style="list-style-type: none">Previous deputation was made at Planning Committee with respect to the ICBL and the intent to develop a portion of the lands as a condominium townhouse project, retaining the Thompson House on the northern portion. Commentary at Committee saw merit in the proposal for intensification, given it fronting two arterial roads and not needing to rely on local road connections. Pre-consultation has already occurred and applications are now nearing completion.	<ul style="list-style-type: none">The edges of neighbourhoods are generally defined by arterial roads and abutting Intensification Areas and Corridors, where higher density development is permitted. The subject site is located at the corner of two arterial roads, where medium and high density up to 4 storeys is permitted by the OPA. Along these arterial roads, a greater transition in character from the existing dwelling types and lot fabrics is permitted.An appropriate transition in height and density can be accommodated in a variety of ways, to be dealt with on a site by site basis.
Nov. 21, 2022	Public Meeting Delegation		<ul style="list-style-type: none">Concern for the proposed OPA; specifically Policy 4.4.3.13.5, 4.4.3.13.6, 4.4.3.13.8, 4.4.3.13.14 and 4.4.3.13.16 which may make the current proposal not permissible.Proposed Policy 4.4.3.13.5 and 4.4.3.13.16 could suggest that the existing character of the neighbourhood is single detached dwellings. This would depend on the definition for limits of the neighbourhood. Section 4.4.3.9 already provides appropriate tests for redevelopment and intensification proposals.Proposed Policy 4.4.3.13.8 suggests a “greater variation from the existing neighbourhood character may be permitted” abutting arterial roads and Intensification Corridors/Area, provided an “appropriate transition in height and density” is created. It is not clear what an appropriate transition would be.Proposed Policy 4.4.3.13.14 along with other proposed policies require new development conform to “the exist physical character of the immediate street block” as it relates to lot ranges, sizes, coverages, building type, etc. The term “immediate street block” is not defined and it is unclear how the policy is to be applied. This policy would seem to undermine the more progressive intentions of Policy 4.4.3.13.8 which permits Medium Density along arterial roads.	

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			<ul style="list-style-type: none">Under proposed Policy 4.4.3.13.16, it seems to suggest that a road connection to local road Mayfield Crescent is encouraged. One of the strengths of the proposed development is that it provides transit supportive densities along two arterial roads, is within 500m of a Central Area and does not require any road connections to the adjacent road. This policy needs to be more permissive and allow for greater flexibility with respect to connecting to the existing road network.The last bullet of Policy 4.4.3.13.16 states that within proposed condominium developments, a transition of lot sizes is required within the plan and adjacent to existing development. If we understand the application of this policy correctly to our client’s proposed development they would need one or some larger townhouse lots or even single detached units adjacent to Mayfield Crescent. An explanation for this requirement would be helpful. This proposed policy requirement appears to have eliminated previously accepted land use planning design solutions being applied to transitional areas of housing form and density by simply mandating a matching lot size within the new development. This policy also seems to run contrary to the proposed policies 4.4.3.13.4 and 4.4.3.15 where assurances are given that context-sensitive and compatible development does not mean that new development must “imitate or replicate” existing development. We have difficulty understanding this overly restrictive policy requirement when other solutions are likely available particularly in the context of an example such as our clients proposal for their lands.	<ul style="list-style-type: none">The policy encourages a seamless extension of the surrounding grid patterns as much as possible, though an interconnected road network. However, this will be assessed on a site specific basis whether this is needed or appropriate – as also applicable for all bullets under this policy. Wording has been updated within this policy from the need to “maintain” the established character of lots to “complement.”

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December 19, 2022	Letter via Email	<p>Rob MacFarlane, Zelinka Priamo Ltd. – Planning Consultants for Choice Properties REIT for the Town of Whitby Official Plan Review</p> <p>Subject Property:3555 Thickson Road North</p>	<p>Height Restrictions</p> <ul style="list-style-type: none">• Requiring an Official Plan Amendment for development over 4 storeys based on the criteria set out in Policy 4.4.3.13.17 is an overly onerous requirement, given the Draft OPA establishes there are instances where higher height is warranted.• A Zoning By-law Amendment is a more appropriate process to consider applications for development beyond 4 storeys. We suggest Policy 4.4.13.13 be revised to replace “amendment to this Plan” with “amendment to the Zoning By-law”.• As a result of Bill 23, we understand the Minister will eventually be the approval authority for future Amendments to the Town’s Official Plan – therefore the Minister will be required to approve any application along an arterial road within the Mature Neighbourhood Study Area for heights beyond 4 storeys• We suggest Policy 4.4.3.13.12 should be revised to replace “shall” with “should generally” so that it reads: “High Density Residential development within Mature Neighbourhoods should generally have a maximum height of 4 storeys...”. <p>Criteria for Additional Height</p> <ul style="list-style-type: none">• Certain criteria for development above 4 storeys set out in Policy 4.4.3.13.17 are inappropriate or overly onerous: <i>“High Density Residential development outside of Central Areas and/or Intensification Areas and Corridors should not compete or detract from the potential to establish these uses in areas designated for intensification”.</i> It is unclear how this criteria is to be measured or determined – in particular, how is one to measure “potential”. We suggest removal of this criteria. <i>“Development shall be within a 45 degree angular plane from any property line abutting a Low Density Residential dwelling”.</i> This is an overly onerous standard, and we recommend that “shall” be replaced with “should generally”. <p>Lack of Clarity for Specific Policy</p> <ul style="list-style-type: none">• Policy 4.4.3.13.11 and 4.4.3.13.12 are unclear as to where Medium Density and High Density development are to be directed. The policies should be revised to clarify that higher density development is directed to lands along arterial roads and at the edges of Mature	<ul style="list-style-type: none">• The requirement for an Official Plan Amendment will ensure development is evaluated on a case-by-case basis based on the criteria set out for the location and transition. While there are instances where higher height is warranted, the proposed criteria will ensure this is carried out in such a way that is compatible with its surroundings.• Until the regulations are passed, it is unclear who will be the approval authority for local OPAs.• This revision would change the intent of the policy to only permit up to 4 storeys without an Official Plan Amendment.• This criteria was extracted from existing Official Plan Policy 4.4.3.9.3.• A 45-degree angular plane requirement is a standard tool used across municipalities to accommodate compatible built form. The size of the subject site would be able to achieve a 45-degree angular plane to adjacent properties.

Public/Development Comments				
Date Received	Format	From	Comment	Response
			<p>Neighbourhoods. The lack of punctuation in the policy modifies its interpretation, wherein it appears to be conditional upon being both along an arterial road and at the edge of the Mature Neighbourhood.</p> <ul style="list-style-type: none">Revisions to the policy are suggested as follows (punctuation added with [,] notation) Policy 4.4.3.13.11: “Medium Density Residential development shall be directed to the edges of Mature Neighbourhoods[,] along arterial roads[,] and abutting Intensification Corridors and Intensification Areas[,] and development shall be subject to the policies of Section 4.4.3.5 and 4.4.3.9[,] in addition to this section...” Policy 4.4.3.13.12: “High Density Residential development shall be directed to the edges of Mature Neighbourhoods[,] along arterial roads[,] and abutting Intensifications Corridors and Intensification Areas[,] and development shall be subject to the policies of Section 4.4.3.6 and 4.4.3.9[,] in addition to this section...” <p>Implications of Bill 23 and Provincial Policy</p> <ul style="list-style-type: none">We seek clarification if the Draft OPA will be amended as a result of Bill 23.Based on our review, it is unclear how the Draft OPA, as currently proposed, is consistent with the Provincial Policy Statement or conforms to the Growth Plan, given the restrictive nature of the Draft OPA as it relates to strict limitations on height and inappropriate development standards, in light of Provincial policies that encourage intensification as a means of growth. We seek additional justification related to the PPS and Growth Plan.	<ul style="list-style-type: none">Agreed. Policy 4.4.3.13.11 and 4.4.3.13.12 have been revised to clarify that Medium and High Density Residential development may occur along arterial roads or abutting Intensification Corridors/Areas <p><i>Policy 4.4.3.13.11: “Medium Density Residential development shall be directed to the edges of Mature Neighbourhoods <u>which includes</u> along arterial roads <u>and or</u> abutting Intensification Corridors <u>or</u> Intensification Areas, <u>and development</u> Development shall be subject to the policies of Section 4.4.3.5 and 4.4.3.9 in addition to this section...”</i></p> <p><i>Policy 4.4.3.13.12: “High Density Residential development shall be directed to the edges of Mature Neighbourhoods <u>which includes</u> along arterial roads <u>and or</u> abutting Intensification Corridors <u>or</u> Intensification Areas, <u>and development</u> Development shall be subject to the policies of Section 4.4.3.6 and 4.4.3.9 in addition to this section...”</i></p> <ul style="list-style-type: none">Bill 23 does not pose any direct impacts to the OPA.Both the Provincial Policy Statement and Growth Plan direct municipalities to identify appropriate locations and opportunities for intensification, as well as create appropriate development standards that facilitate intensification and compact built form. The Province directs intensification first to Strategic Growth Areas (areas outside of Mature Neighbourhoods) and does not note that intensification is unlimited. The Town has previously identified intensification areas and intensification corridors (the Strategic Growth Areas). Outside Strategic Growth Areas municipalities must take into account existing building stock and appropriate areas, as well as establish standards depending on the area and characteristics of different locations.