
PLANNING JUSTIFICATION AND RATIONALE ADDENDUM REPORT

"ORANGEVILLE HIGHLANDS PHASE 2"

PLAN OF SUBDIVISION (OPZ 5/10 AND S 1/10)

Orangeville Highlands Limited and
Brucedale Investments Inc.
Part of Lot 3, Concession 2, W.H.S
Town of Orangeville, County of Dufferin

April 2019

GSAI File # 1045-001

**ADDENDUM Planning Justification and Rationale Report
“Orangeville Highlands Phase 2” Plan of Subdivision and
Zoning By-Law Amendment Application Resubmission
(OPZ 5/10 and S 1/10)
Town of Orangeville, County of Dufferin**

1.0 INTRODUCTION

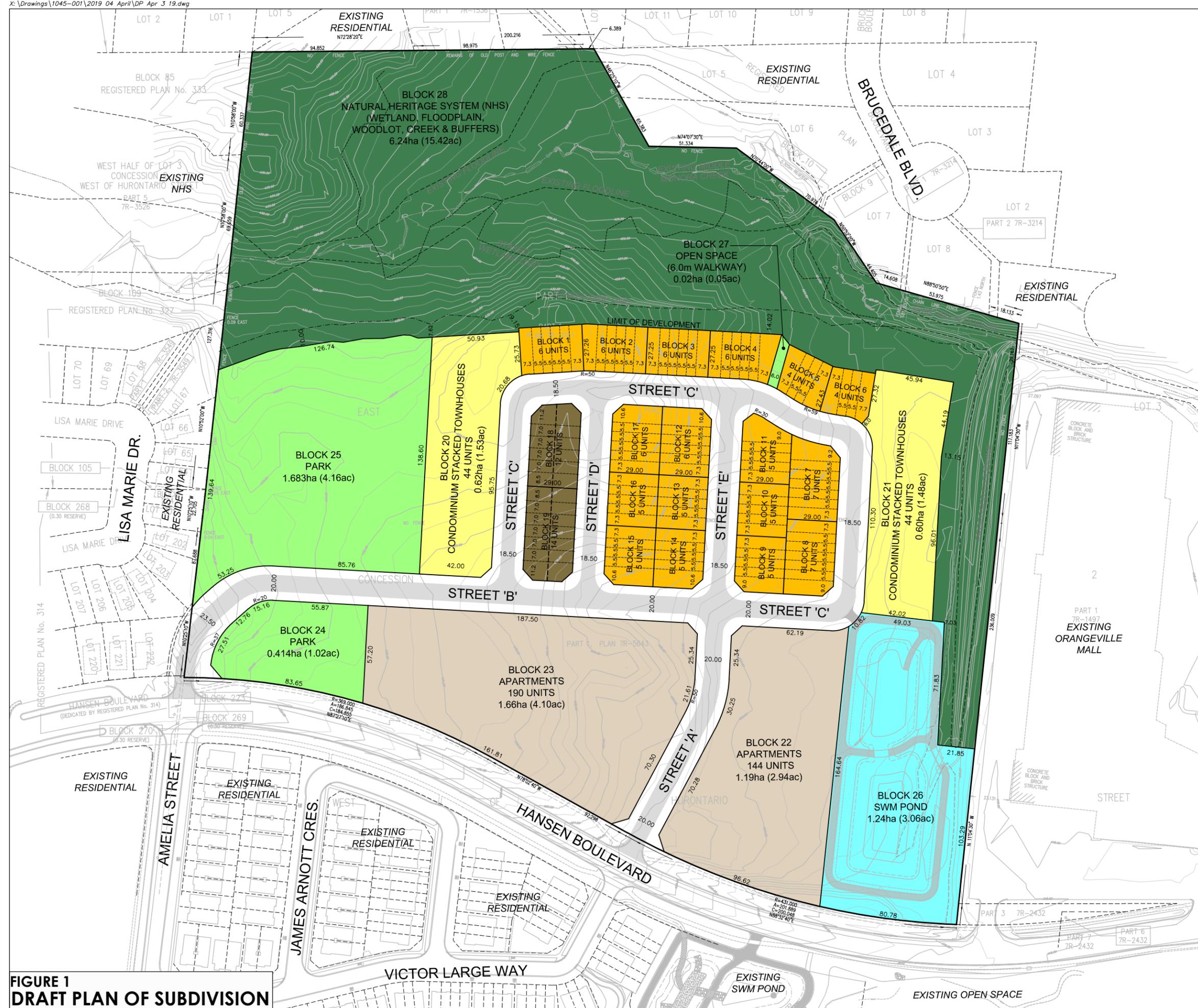
Brucedale Investments Inc. and Orangeville Highlands Limited are the owners of 17.95 ha (44.36 acres) of land located on the north side of Hansen Boulevard, just west of Highway 10 in the Town of Orangeville. The subject property is legally described as Part of Lot 3, Concession 2, WHS, Town of Orangeville. Applications for Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision were filed in 2010 and are referred to as Files OPZ 5/10 and S 1/10 at the Town of Orangeville.

The proposed planning applications relate to development of approximately 17.95 ha (44.36 acres) of land in Orangeville for a revised residential Plan of Subdivision. There have been several iterations of the Draft Plan over the years in response to circulated comments from the Town and agencies and the public. A copy of the latest Draft Plan of Subdivision (dated April 3, 2019) is attached as Figure 1 to this report.

The April 3, 2019 revised Plan of Subdivision specifically proposes a total of 541 residential units comprised of several built forms. Specifically, this Plan includes 93 conventional townhouse units, 26 back-to-back townhouse units, 88 stacked condominium townhouse units, and 334 apartment units divided amongst 5 buildings (consisting of 2 buildings at 5 stories and 3 buildings at 6 stories). Further, the revised Plan of Subdivision proposes 6.24 ha (15.42 ac) of natural heritage system to be protected, an open space walkway, two park blocks consisting of 2.10 ha (5.19 ac) collectively (one park block is intended for a dog park), a stormwater management pond consisting of 1.24 ha (3.06 ac) and internal roads. The proposed Plan of Subdivision is to be serviced utilizing municipal services.

As background, the original Planning applications were filed in **June 2010**. A formal Public Meeting was convened in connection with the original applications in **March 2011** and a Public Open House was held in **May 2011**.

There have been several iterations of the Draft Plan over the years in response to circulated comments from the Town and agencies and the public. In **October 2017** Glen Schnarr & Associates Inc. filed a partial resubmission in connection with Draft Plan of Subdivision and Zoning By-Law Amendment with the Town of Orangeville to permit the development of the Plan of Subdivision containing a (previous) total of 623 units consisting of conventional townhouse units, back-to-back townhouse units, stacked condominium townhouse units and apartment units divided amongst 6 buildings, at 6 storeys each. Further, the previous Plan of Subdivision proposed 6.12 ha (15.12 ac) of natural heritage system to be protected, an open space walkway, two park blocks consisting of 2.08 ha (5.14 ac) collectively (one park block for a dog park), a stormwater management pond and roads on the subject property.



**DRAFT PLAN OF SUBDIVISION
ORANGEVILLE HIGHLANDS LIMITED &
BRUCEDALE INVESTMENTS INC.**

FILES: OPZ 5/10 & S 1/10
PART OF LOT 3,
CONCESSION 2 W.H.S.,
TOWN OF ORANGEVILLE
DUFFERIN COUNTY

OWNERS CERTIFICATE
I HEREBY AUTHORIZE GLEN SCHNARR ASSOCIATES INC. TO PREPARE AND SUBMIT THIS DRAFT PLAN OF SUBDIVISION TO THE TOWN OF ORANGEVILLE FOR APPROVAL.

BRUCEDALE INVESTMENTS INC.
SIGNED: [Signature] JOHN G. NESBITT, PRESIDENT DATE OCT. 17, 2017
SIGNED: [Signature] GILBERT L. BOLAND, DIRECTOR

ORANGEVILLE HIGHLANDS LIMITED
SIGNED: [Signature] GILBERT L. BOLAND, PRESIDENT DATE OCT. 17, 2017
SIGNED: [Signature] JOHN G. NESBITT, SECRETARY

SURVEYORS CERTIFICATE
I HEREBY CERTIFY THAT THE BOUNDARIES OF THE LANDS TO BE SUBDIVIDED AS SHOWN ON THIS PLAN AND THEIR RELATIONSHIP TO ADJACENT LANDS ARE CORRECTLY AND ACCURATELY SHOWN.

SIGNED: [Signature] THOMAS SALB, O.L.S. DATE SEPT. 28, 2017
JD BARNES LIMITED
401 WHEELABRATOR WAY, SUITE A
MILTON, ONTARIO L7T 3C1

ADDITIONAL INFORMATION
(UNDER SECTION 51(17) OF THE PLANNING ACT) INFORMATION REQUIRED BY CLAUSES A,B,C,D,E,F,G,J & L ARE SHOWN ON THE DRAFT AND KEY PLANS.

- H) MUNICIPAL AND PIPED WATER TO BE PROVIDED
- I) SANDY LOAM AND CLAY LOAM
- K) SANITARY AND STORM SEWERS TO BE PROVIDED

LAND USE SCHEDULE

LAND USE	BLOCKS	AREA (ha)	AREA (ac)	UNITS
TOWNHOUSE (STREET) - 5.5m (18')	1-17	1.71	4.23	3
TOWNHOUSE (BACK TO BACK) - 7.0m (23')	18-1	0.2	0.72	2
TOWNHOUSE (CONDOMINIUM STACKED)	20,21	1.22	3.01	88
APARTMENTS	22,23	2.85	7.04	334
PARK	24,25	2.10	5.1	
SWM POND	2	1.24	3.0	
OPEN SPACE (WALKWAY)	27	0.02	0.05	
NATURAL HERITAGE SYSTEM - BUFFER (NHS)	28	2.24	5.42	
18.5m ROW (-15m)		1.15	2.84	
20.0m - 23.5m ROW (5-1m)		1.13	2.7	
TOTAL	28	17.95	44.36	541

NOTES
- Streets A □ B □ Hansen Blvd. intersection daylight triangles □ 7.5m x 7.5m
- All other daylight triangles are □ m x □ m
- Pavement Illustration is diagrammatic only
- Natural Heritage System constraint information provided by Urbantech April, 2011 □

**FIGURE 1
DRAFT PLAN OF SUBDIVISION**

In **May 2018** Glen Schnarr & Associates Inc. refiled the same Draft Plan of Subdivision (dated October 2017) and supplemented it with the balance of the technical information to support it, including a Functional Servicing Report (Urbantech, April 2018), a Transportation Impact Study (Paradigm Transportation Solutions, May 2018), an Environmental Impact Study and Management Plan (Azimuth Environmental Consulting Inc., April 2018), a Hydrogeological Update Report (Azimuth Environmental Consulting Inc., May 2018) and a Planning Justification and Rationale Report (GSAI, May 2018). This submission resulted in receipt of a Town comment package dated **November 29, 2018** which included (among others) Town Planning, Town Public Works, County of Dufferin and CVC comments requiring additional information and clarification related to the proposed development.

On **September 10, 2018** the Town of Orangeville convened a second formal Public Meeting for the revised Plan of Subdivision. There were a number of public questions and comments presented at that meeting which have helped form the content of this resubmission.

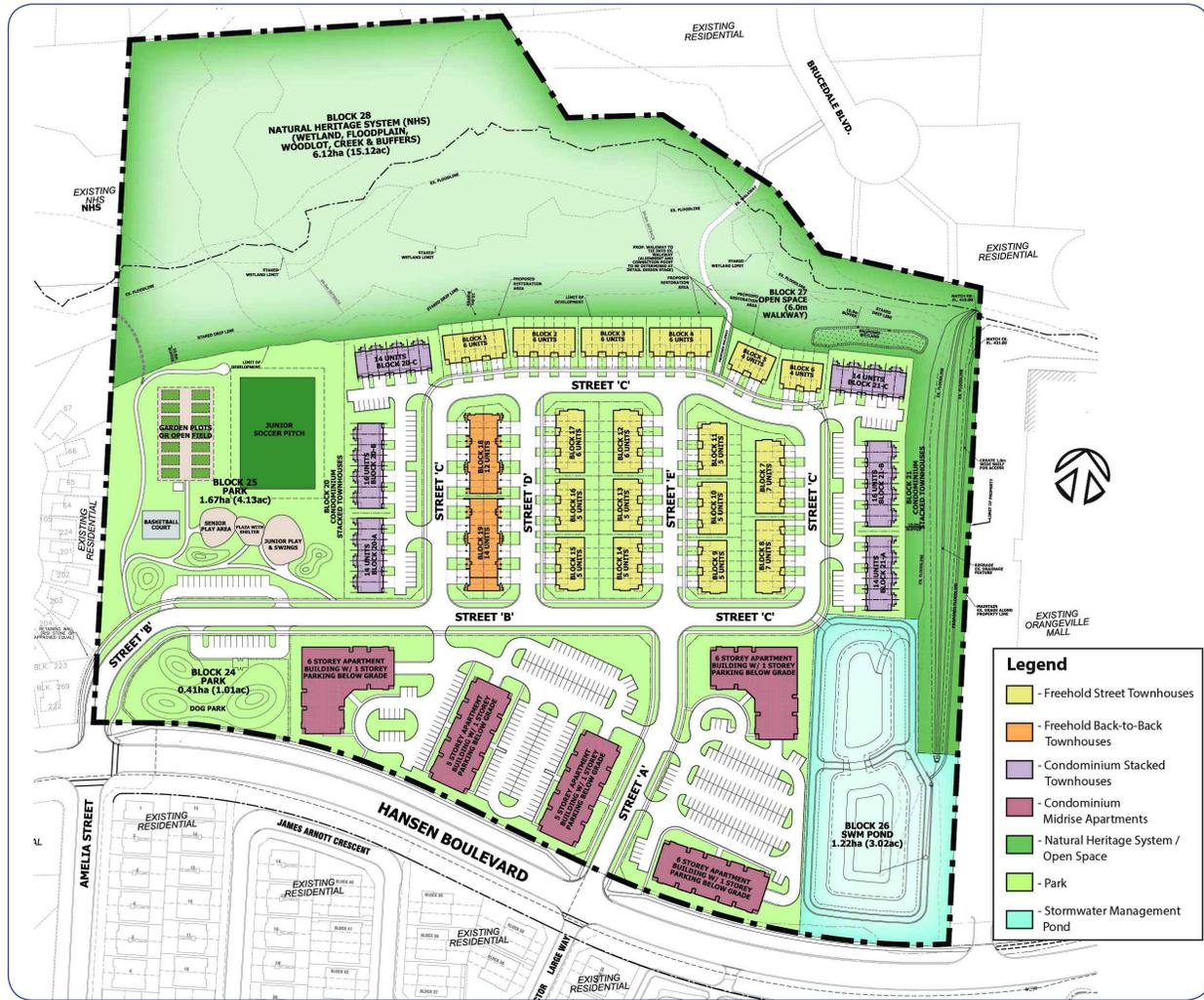
This **April 2019** resubmission responds to all Town, County, agency and CVC comments to date, as well as public comments received to date. This resubmission relates to the amended Draft Plan of Subdivision dated April 3, 2019, which includes the following revisions since the October 2017 Plan:

- an adjustment to the north development limit of the Plan of Subdivision (with the effect of increasing lands encompassed in the Open Space Block);
- an adjustment to the east drainage channel to reflect up to date regional flood data and proposed channel realignment;
- a decrease in the proposed apartment unit total from 432 to 334 units;
- an increase in the proposed stacked townhomes from 72 to 88 units;
- an adjustment to Block 26 SWM pond from 1.06 ha to 1.24 ha;
- an adjustment to Block 21 east development limit;
- an adjustment to the total developable area to reflect new development limits;
- an adjustment to the total overall unit count from 623 units to 541 units; and
- a resultant adjustment in overall density for the development from 97.6 units per net residential hectare to 89.1 units per net residential hectare.

As shown on the Preliminary Development Concept Plan (Figure 1A), the original proposal for six apartment buildings (each proposed at 6 stories in height) containing a total of 432 units within Blocks 22 and 23 has been **revised** to include five apartment buildings (2 with a height of 5 stories and 3 with a height of six stories) with a total of 334 apartment units. The proposed apartment buildings will be designed to respect the importance of their prominent locations along Hansen Boulevard, while serving as a transition to lower density residential uses to the north, west and south. The design of new mid-rise built form will be designed for compatibility with nearby development in relation to massing, scale, design, and streetscape.

Orangeville Highlands - Phase 2
Urban Design Brief

Town of Orangeville



Concept Plan

**FIGURE 1A
CONCEPTUAL/PRELIMINARY
DEVELOPMENT CONCEPT
PLAN**



Scale NTS
April 2019

2.0 PURPOSE OF THIS ADDENDUM PLANNING JUSTIFICATION

A Planning Justification and Rationale Report was prepared and submitted in May 2018 with the resubmission in connection with the Draft Plan of Subdivision and the related Zoning By-Law Amendment application.

This **Addendum Planning Justification and Rationale Report (April 2019)** summarizes the Plan revisions and technical report updates that have occurred since the May 2018 resubmission and continues to demonstrate that the application is justified, conforms to the applicable policy framework, represents good planning and should therefore be approved. It is important to note that the Planning Justification and Rationale Report (May 2018) provided a detailed overview of the 2014 PPS, the 2017 Growth Plan, the County of Dufferin Official Plan and the Town of Orangeville Official Plan policies. Unless further commentary is required to further expand upon or clarify rationale presented in May 2018, this report does not duplicate that planning policy review. To the extent that justification commentary has already been provided in previous reports, that commentary is referenced but will not be fully detailed in this report. This report also reviews the proposed draft implementing Zoning By-Law in detail.

This is a full resubmission of the Draft Plan of Subdivision and Rezoning applications, and it is anticipated that full department and agency circulation is going to be undertaken by the Town as it relates to this submission. A copy of the latest Draft Plan of Subdivision (prepared by Glen Schnarr & Associates Inc. dated April 3, 2019) is attached as Figure 1 to this report.

An amendment to the Official Plan is not required to facilitate the proposed residential Plan of Subdivision. An amendment to the Zoning By-Law and Draft Plan of Subdivision Approval are required to permit the proposed Plan of Subdivision in accordance with the revised draft plan.

3.0 SITE CHARACTERISTICS AND PROPOSED DEVELOPMENT

The subject site is approximately 17.95 ha (44.36 acres) located on the north side of Hansen Boulevard, just west of Highway 10 in the Town of Orangeville. The subject property was formerly used for agricultural purposes and is currently partially agricultural and partially vacant. The site is currently covered by fallow farmland, cedar scrub brush and tall grass fields and a 2.0 ha portion of the property has been regraded for a park, a portion of which is currently being utilized for a dog park. No structures are on the subject property. Figure 2 represents an aerial view of the subject lands and surrounding lands.

The lands surrounding the subject property consist of low density residential uses to the north, west and south, and the Orangeville Mall to the east. Further east is Highway 10 and the Island Lake Reservoir.



FIGURE 2
AERIAL CONTEXT

 SUBJECT PROPERTY



Scale NTS
April 2019

Access to the subject property is proposed from Hansen Boulevard. Specifically, an extension of Amelia Street is proposed to extend into the subject property at its western limit and will utilize the existing traffic lights at that intersection. A second full moves access with traffic lights is proposed further east, off Hansen Boulevard opposite Victor Large Way, leading into the subject property.

The subject lands are currently designated “Residential”, “Open Space Conservation”, and “Open Space Recreation” on Schedule ‘A’ (Land Use Plan) in the Orangeville Official Plan (Figure 3). Further, the lands designated “Residential” are further identified as “Medium Density Residential” on Schedule ‘C’ (Density Plan) (Figure 4) and as an area subject to “Policies for Specific Areas” on Schedule ‘B’ (Policies for Specific Areas) (Figure 5) in the Town’s Official Plan. Specifically, the special site policy for the subject lands requires the subject lands **to be developed at a minimum residential density of 75 and a maximum density of 99 units per net residential hectare.** The revised proposed Draft Plan of Subdivision proposes an overall density of **89.1 units per net residential ha** which is consistent with the Official Plan’s density policies for these lands. It should be noted that this revised Draft Plan represents a reduction in overall density from the previous (Oct 2017) draft Plan which proposed an overall density of 97.6 units per net residential hectare.

The northern portion of the subject lands within the “Open Space Conservation” land use designation has been staked and surveyed on site and has been delineated on the Draft Plan as Block 28 (Natural Heritage System) consisting of 6.24 ha (15.42 ac). This block includes the requisite setback buffers from the features, including min 30 m buffer from the PSW, 10 m buffer from the woodlot dripline, 30 m setback from Middle Monora Creek and 10 m from the floodline limit.

The western portion of the subject lands is within the “Open Space Recreation” land use designation and has been delineated on the Draft Plan of Subdivision as Block 24 (Park) consisting of 0.414 ha (1.02 ac) and Block 25 (Park) consisting of 1.683 ha (4.16 ac).

The Draft Plan of Subdivision and supporting technical reports have undergone revisions in response to comments received from the County of Dufferin, CVC, Town of Orangeville and other agencies. Further to receipt of comments, meetings have occurred with the applicant, agencies, and the Town to further understand certain comments and recommended revisions. As a result, this resubmission represents a comprehensive and complete submission that will assist in facilitating the Town’s support for Draft Plan Approval for this development.

4.0 LAND USE POLICIES AND COMMENT RESPONSES

4.1 Provincial Policy Statement 2014

The Provincial Policy Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. The 2014 PPS provides for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural environment. The PPS supports improved land use planning and

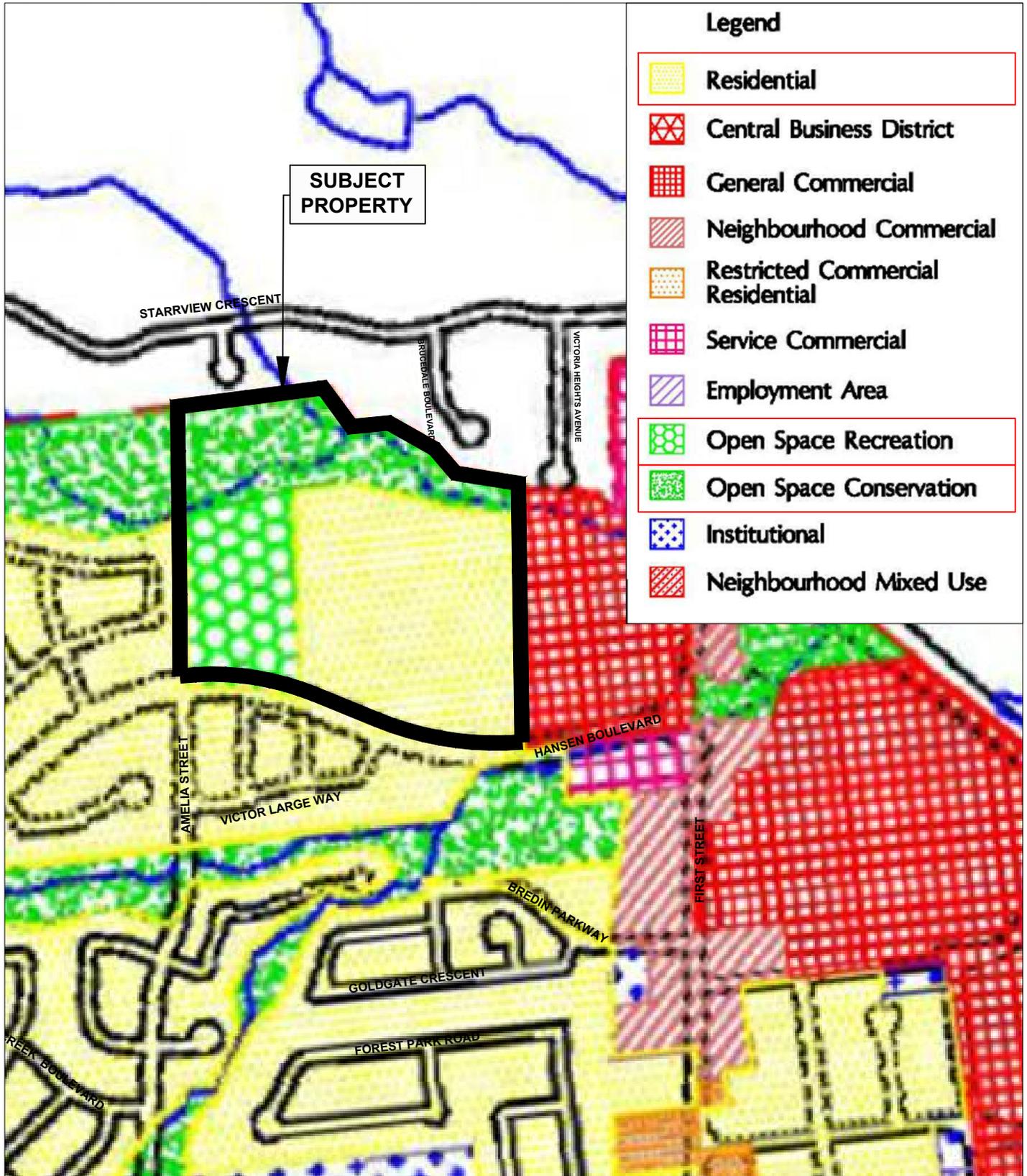


FIGURE 3
TOWN OF ORANGEVILLE
OFFICIAL PLAN

SCHEDULE 'A' - LAND USE PLAN

SUBJECT PROPERTY



Scale NTS
 April 11, 2019

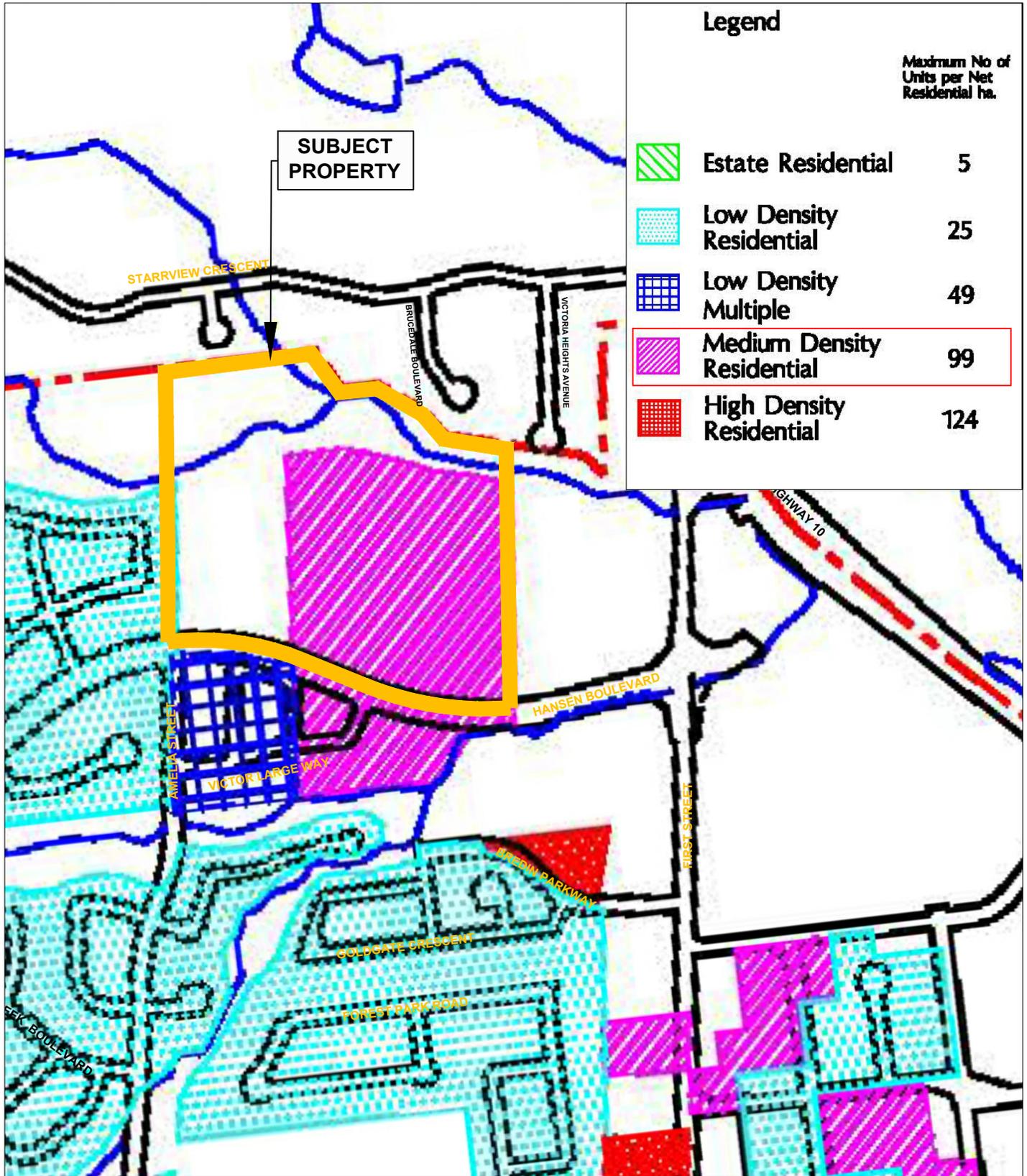


FIGURE 4
TOWN OF ORANGEVILLE
OFFICIAL PLAN

SCHEDULE 'C' - RESIDENTIAL DENSITY PLAN

SUBJECT PROPERTY



Scale NTS
 April 11, 2019

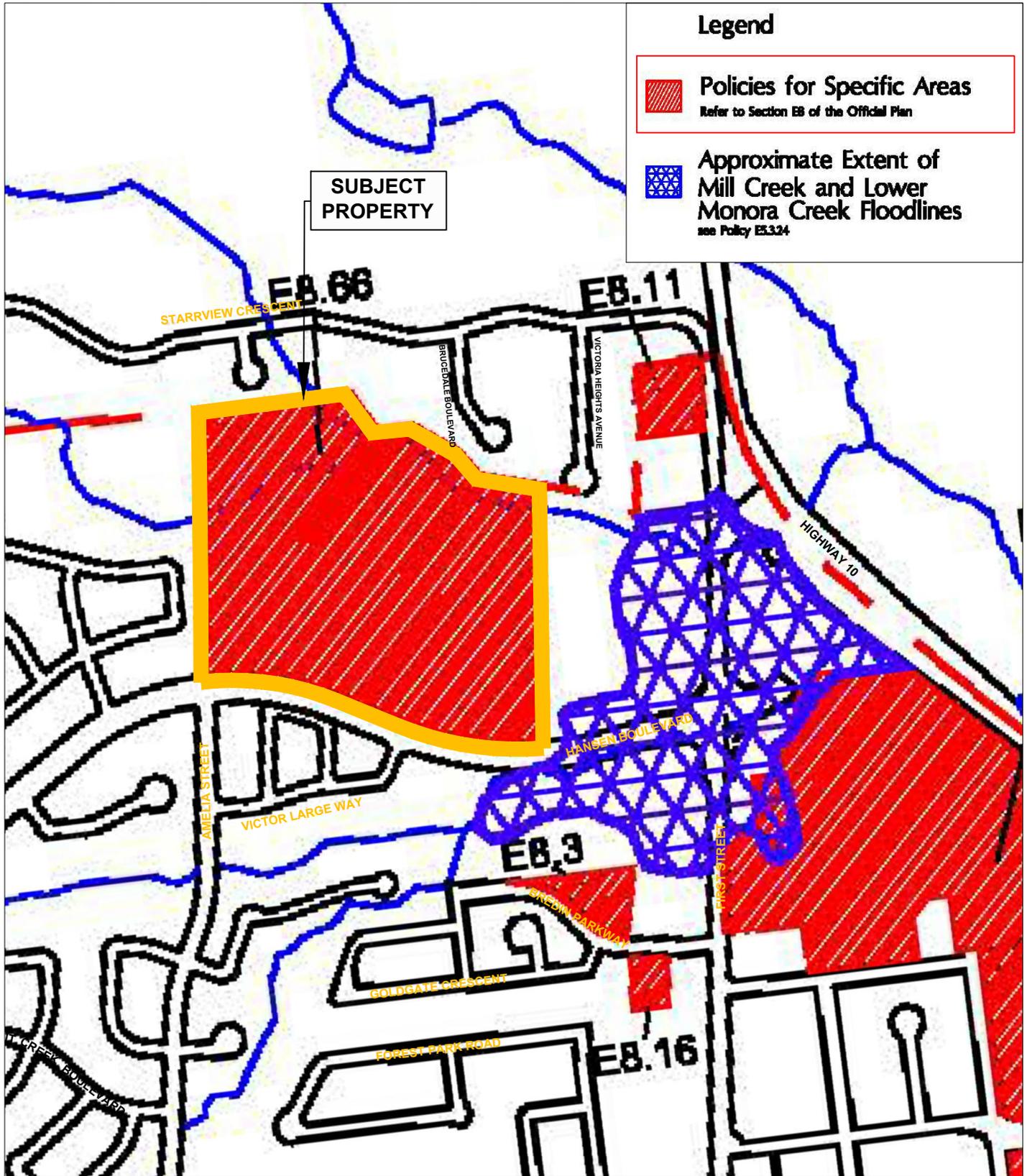


FIGURE 5
TOWN OF ORANGEVILLE
OFFICIAL PLAN

SCHEDULE 'B' - POLICIES FOR SPECIFIC AREAS

 SUBJECT PROPERTY



Scale NTS
April 2019

management, which contributes to a more effective and efficient land use planning system. Decisions affecting planning matters “shall be consistent with” the 2014 Provincial Policy Statement.

As noted earlier in this report, a detailed overview of the 2014 PPS was provided in the **Planning Justification and Rationale Report (May 2018)** and accordingly, these policies have not been reviewed again (in duplicate) here.

4.2 Growth Plan for the Greater Golder Horseshoe (2017)

The Growth Plan for the Greater Golden Horseshoe, 2017 (Growth Plan) builds upon the initial Growth Plan (2006) and responds to the key challenges that the region continues to face over the coming decades with enhanced policy directions. The Growth Plan policies relevant to the proposed development include Policy 2.2.1 ‘Managing Growth’, Policy 2.2.2 ‘Delineated Built-up Areas’, and Policy 2.2.6 ‘Housing’. These sections were discussed in the May 2018 Planning Justification and Rationale Report and accordingly, these policies have not been reviewed again (in duplicate) here.

4.3 Country of Dufferin Official Plan (2017 Office Consolidation) and County Comments dated July 2018

The County of Dufferin Official Plan provides guidance to the area municipalities in the preparation and implementation of their local Official Plans. The subject lands are located within the “Prime Settlement Area” and recognized as an Urban Settlement Area in the County of Dufferin Official Plan. The purpose and objectives for Urban Settlement Areas in the County include functioning as the primary centres for growth, development and urban activities. Urban settlement areas are meant to be the focus of residential, commercial, industrial, institutional, cultural, recreational and open space uses within the County.

The subject lands are located within a designated greenfield area within the Orangeville Urban Settlement Area. The Town of Orangeville is the largest of the County’s municipalities and will need to accommodate the largest minimum new greenfield development density targets (46 residents and jobs per ha) within the County.

While many of the County Official Plan policies were reviewed in the May 2018 Planning Justification and Rationale Report, additional relevant sections of the County Official Plan and our commentary follows.

It is noted in the County of Dufferin’s July 25, 2018 comments to the resubmission of the Plan that *“the site is located outside of the Built Boundary Area (S.3.5.1) and is therefore considered a designated greenfield area and subject to the minimum density targets of S.3.4.3 of the Country Official Plan (i.e. 46 residents and jobs per ha). In accordance with the Growth Plan, the existing alternative approved targets are to remain in place until such time as the County municipal comprehensive review is approved.”* It is further noted by the County that *“the Town*

must ensure that this minimum density target is being achieved, as calculated in accordance with the Growth Plan requirements.”

As noted in the May 2018 Planning Justification and Rationale Report, the Town of Orangeville adopted OPA 103 in 2009 to implement a broad range of policies related to the Growth Plan (2006). Specifically, Town Staff Report PL-2009-08 (Official Plan Review and Zoning By-Law Update OPZ 5/08) of April 30, 2009 was prepared to present Council and the public with background information and proposed draft policies for the Official Plan review and Zoning By-Law update related to the Places to Grow conformity exercise at the time. Interestingly, this staff report noted the following with respect to staff’s proposed policy changes to the Official Plan to comply with the Province’s Growth Plan:

“The Dufferin County Growth Plan Implementation Study concluded that, overall, residential densities must increase across the County to meet the Provincial density and population targets set out in Places To Grow” ...

“... In Orangeville, there are only two residentially-designated areas of the community that are not currently subject to development proposals, being (1) the 17.9 ha parcel of land west of First Street, on the north side of Hansen Boulevard” ...

“...parcel (1) is already designated with a high development density in the Official Plan (i.e. up to 99 units per net residential hectare)” ...

“... To comply with the Growth Plan and recommendations of the Implementation Study, Planning staff are proposing that a minimum development density of 75 units per net residential hectare is imposed.” (page 5 to Report PL-2009-08).

The proposed revised overall density of 89.1 units per net hectare across the site conforms with the Town of Orangeville’s site-specific policy for the subject lands which was specifically introduced and approved in order to ensure Orangeville achieves the County density and population targets, as prescribed by the Province.

As well, County of Dufferin comments request further clarification related to which features are identified to be significant on site and confirmation that there will be no negative impacts to the natural features or their ecological functions. In response to the County’s comments in this regard, Azimuth has prepared an EIS and MP Response Document (April 2019) outlining detailed responses to certain comments related to the EIS and MP. Specifically, Azimuth identifies that there are several significant natural heritage features associated with the property including Provincially Significant Wetland, woodland and watercourses. Further, Azimuth confirms that the environmental constraints to development have been highlighted within Azimuth’s Figures to their report and all development is proposed outside of the identified environmental constraint areas except for minor encroachment areas that are required for transition grading and to regularize the lot lines.

4.4 Town of Orangeville Official Plan (Office Consolidation December 2018) and Town comments dated November 2018

The Town of Orangeville Official Plan provides direction and support for general land use and long-term growth and development in order to meet the needs of the community. The 2013 Office Consolidation was referenced in the previous (May 2018) Planning Justification and Rationale Report. For this Addendum Report, the December 2018 Office Consolidation has been used.

The subject lands are located within a Greenfield Area of the Town of Orangeville and are designated “Residential”, “Open Space Recreation” and “Open Space Conservation” on Schedule ‘A’ (Land Use Plan) in the Town’s Official Plan (Figure 3). The residential portion of the subject lands are further identified as “Medium Density Residential” on Schedule ‘C’ (Density Plan) (Figure 4) and the entire site is shown as Special Policy Area “E8.66” (Special Policy Area 66) on Schedule ‘B’ (Policies for Specific Areas) in the Official Plan (Figure 5).

While many of the Town’s Official Plan policies were reviewed in the May 2018 Planning Justification and Rationale Report, additional (and repeated) relevant sections of the Official Plan have been reviewed again in this Addendum in order to provide more clarification in response to certain comments received.

Town Planning Comment No. 1 (Density):

Town of Orangeville Planning Comments (November 29, 2018) request clarification on the proposed density of the Plan of Subdivision. Specifically, the Town recognizes in their comments that the overall density of the Draft Plan falls within the Town’s requisite density range for these lands of 75-99 units per net residential hectare; however, the Town requests further clarification on whether it is appropriate to differentiate density of the apartment blocks from the townhouse blocks.

In responding to this Town comment, it is important to understand the site-specific policy Section E 8.66, which describes that the lands subject to the policy shall develop at a minimum residential density of 75 units per hectare and a maximum residential density of 99 units per hectare. This density range is required to apply to the entire site which is subject to the site-specific policy. To clarify, the site-specific policy area encompasses the entire subject lands (per Schedule ‘B’ (Policies for Specific Areas) in the Town’s Official Plan). This is clearly depicted on Figure 5 of this report. Additional commentary to respond to the Town’s comment in this regard is found below:

The Correct Method for Measuring Density Targets

The starting point for the correct method of measurement is found in Section 2.2.7.3 of the 2006 Growth Plan which states that the measurement of the minimum density target is measured “*over the entire designated greenfield area*”. That same measuring stick is found in the slightly amended provision of Section 2.2.7.3 of the 2017 Growth Plan, which notes “*the minimum*

density target will be measured over the entire designated greenfield area of each upper- and single-tier municipality”.

That method of measurement applies to both the entire designated greenfield area or to one specific greenfield area, such as the Orangeville Highlands site. This is confirmed through the 2017 Growth Plan’s clarification of Defined Terms and Meanings (Section 1.2.3: How To Read This Plan) which indicates “*Defined terms are intended to capture both singular and plural forms of these terms in the policies*”. Further, Section 2.2.7.5 of the 2017 Growth Plan makes reference to “*the minimum density target for designated greenfield areas contained in the applicable official plan*”. This further confirms the intent of the Growth Plan that greenfield density shall be acknowledged and measured for areas within the applicable municipal official plan.

Clarification on the Form of Use(s) and Density Target Range that the Town’s Official Plan Assigns to the Subject Lands

As noted in the May 2018 Planning Justification and Rationale Report, the subject lands are located within a Greenfield Area of the Town of Orangeville and are designated “Residential”, “Open Space Recreation” and “Open Space Conservation” on Schedule ‘A’ (Land Use Plan) in the Town’s Official Plan (Figure 3). Section E 1.3 in the Official Plan sets out Permitted Uses for lands within the “Residential” land use designation, as follows:

“E 1.3 In areas designated Residential, an appropriate range of housing types are permitted including such uses as single detached, converted dwellings, semi-detached dwellings, duplex dwellings, triplexes, quadruplexes, and multi-family housing including row/townhouses and apartments. The location of housing types and residential densities is further defined by Schedule “C” - Residential Density Plan. Other policies in this Section define each designated density by permitted dwelling type as well as the number of units permitted per net residential hectare.”

As noted already, the subject property is designated “Medium Density Residential” on Schedule “C” (Residential Density Plan) (Figure 4). Section E 1.4.4. of the Official Plan has the following permissions for lands designated “Medium Density Residential”:

“E 1.4.4 Medium Density Residential - This designation permits row/townhouses and apartments with a maximum density of 99 units per net residential hectare.”

Clearly, row/townhouses and apartments are built forms that are contemplated on lands designated “Medium Density Residential” in the Official Plan. Further, as noted already, the subject lands are also subject to a Site-Specific Policy, as shown on Figure 5. Section E 8 notes the following as introduction to the Site-Specific Policy section in the Official Plan:

“E 8 Policies for Specific Areas

The following Policies apply to specific areas of the Town, where additional detailed policies are required to indicate the intent of Council for the use of land. The location of the lands to which these policies are applied are indicated on Schedule B to the Official Plan and are identified with the appropriate Section numbers as follows:”

“E 8.66

Notwithstanding the Medium Density Residential designation of the lands located on the north side of Hansen Boulevard, west of First Street, that lands shall develop at a minimum density of 75 and a maximum of 99 units per net residential hectare. (OPA 103)”

Clearly, the intent of Council is that the subject lands (in their entirety, as mapped on Figure 5) are required to develop at a specific density range of between 75 and 99 units per net residential hectare. It is also important to note that the notation “[OPA 103]” appears immediately following the text of the section. That notation refers to the enactment by the Town of OPA 103 in 2009. The enactment of OPA 103 was a specific exercise undertaken by Council to bring the Town’s Official Plan completely into conformity with the 2006 Growth Plan.

Applying the Correct Method of Measuring Density Targets to the Density Target Range Assigned to the Subject Lands

As noted above, the provisions of Section 2.2.7.3 of the Growth Plan require that “*the minimum density target will be measured over the entire designated greenfield area of each upper- and single-tier municipality*”. Similarly, Section E 1.11.8 of the Town’s Official Plan contains the following policy regarding measuring density within greenfield areas:

“E 1.11.8 Council will ensure that the designated greenfield area, as shown on Schedule “B1”, will be planned to achieve a minimum density target that is not less than 46 residents and jobs per hectare. The density target for the designated greenfield area will be measured over the entire designated greenfield area of the Town of Orangeville, in accordance with the policies of the Province’s Growth Plan for the Greater Golden Horseshoe...”

It is noted that Town comments of November 2018 cited above confirm that “*...the overall density (97 units per hectare) of the current draft plan (2017) falls within this density range*” referring to the requisite density range for the subject lands of between 75 and 99 units per net residential hectare. Similarly, it would be concluded that the new proposed density of 89.1 units per hectare falls within the density range, as well. The Official Plan should be read sequentially as described above and, accordingly, the provisions of Section E 1.4.4. and E 8.66 establish the built forms and specific density target range, respectively, for the subject lands.

The latter portion of the Town comment suggests that the density for the apartment blocks should perhaps be considered and calculated separately. However, it is important to understand that if density was specifically separated out and calculated for a portion of the subject lands (i.e. Apartment Blocks 22 and 23), this would have the effect of creating non-conformance on the balance of the site with respect to the achievement of the specific density target range prescribed through Section E 8.66 (between 75 and 99 unit per net residential ha). Specifically, the revised Draft Plan (Figure 1) shows a proposed 334 apartment units on 2.85 hectares which, on its own, equates to 117.2 units per net hectare. This would leave the balance of the site (consisting of the three type of townhouses) at a density 64.3 units per net ha (207 units on 3.22 ha). To separate the apartment blocks and townhouse blocks when calculating density results in separate densities that are outside of the prescribed range for these lands. Specifically, the apartment density is well above the prescribed range, and the townhouse density is well below the prescribed range, required through Section E 8.66 of the Official Plan.

Accordingly, any separation of density among the Blocks in this Draft Plan would be contrary to the Site-Specific Policy that has been in effect for these lands since the approval of OPA 103 in 2009. The proposed overall development conforms with the Town of Orangeville Official Plan density policies as the proposed overall density of the development is 89.1 units per net residential hectare, which is well inside the range prescribed in the Official Plan.

Town Planning Comment No. 2 (Urban Design and Built Form):

Town comment No. 2 requests the completion of an Urban Design Brief with implementing Architectural Control Guidelines to support this development application. In response to this comment, Williams & Stewart Associates Limited / John G. Williams Limited, Architect have completed an “Urban Design Brief and Architectural Control Guidelines” (April 2019) (UDB) in conjunction with terms of reference completed and approved by the Town of Orangeville. A summary of what this report specifically addresses is noted below:

- **Describes the design vision for the proposed development and the approach to fulfilling the Community Form and Identity goals, objectives and policies of the Orangeville Official Plan;**

Section 1.6 of the UDB discusses the design vision and objectives of the proposed development. Specifically, it is noted that the vision is to create a compact, pedestrian-scaled, mixed-density neighbourhood with attractive streetscapes, ample public open spaces and a range of housing types. As well, Section 1.7 of the UDB provides commentary and policy review related specifically to Section D 7 (Community Form and Identity) from the Official Plan. In this section it is noted that the design of the plan responds to the site’s existing topography, natural features as well as the surrounding planned context. The Plan has been designed to appropriately interface with neighbouring developments and open spaces and to ensure that new built forms frame adjacent streets to provide an attractive public realm.

- **Provides an analysis of existing architectural design, built form character, landscape, circulation and open space networks, along with a detailed assessment of how the proposed design will compliment and enhance such attributes;**

Section 4.1 of the UDB provides commentary and conceptual renderings / illustrations related to the architectural character of the proposed development. It is noted that Architectural form and style shall complement the design of the public realm and landscaping treatments to create a vibrant public realm. It is recommended that building elevations shall display a considerable degree of variety and façade articulation and that blank façades which are visible to the public should not be permitted.

Section 3.2 of the UDB contains commentary regarding the public realm, which is a vital component of the proposed development. Through this discussion it is confirmed that the proposed development will provide a functional, safe, sustainable, and attractive neighbourhood environment, well articulated streetscapes with landscaped boulevards, a network of streets that accommodate multi-modal choices for pedestrians, cyclists, and vehicles, and pedestrian linkages that connect the residential population to adjacent neighbourhoods, open space areas and commercial facilities. The open space block, park blocks and trail are discussed in the context of contributing to the identity of the community, sustainability, connectivity, and promotion of an active lifestyle.

- **Provides a detailed analysis of the proposed design using plans, elevations, sections, renderings, photographs and accompanying commentary text;**

The UDB uses renderings, photographs, commentary and massing plans to deliver the detailed analysis, assessment and recommendations for the proposed design and built forms within the report. The report explores built form within existing neighbourhoods in the vicinity of the subject property and refers to the broad mix of lot sizes, built forms and dwelling types that are proposed for the proposed development. It is noted that the provision of new and smaller housing forms such as back-to-back townhouses, stacked townhouses and condominium apartments create opportunities for first-time purchasers and empty nesters to stay within the community. Architectural character is discussed in detail in Section 4.1 of the report and notes that it will be derived from traditional / heritage-inspired precedents. The goal is to allow for sufficient design variety that results in a high quality character with a coherent identity that respects and is relevant to the character of Orangeville.

- **Provides detailed design direction for the proposed development addressing matters such as: public realm; building design and streetscape enhancement; sustainability features; provision and accommodation of parking; pedestrian circulation; built form transition;**

Section 3 of the UDB provides detailed commentary on the public realm and urban design guidelines and includes discussion on community safety, public realm guidelines, street network and streetscape objectives, active transportation, the open space network, and sustainability in the context of building and development considerations. This

discussion provides an overview of how the proposed development will balance the health and well being of the environment with the proposed development and related urbanization of the subject lands.

- **Provides implementing architectural design guidelines as appropriate.**

Section 4 of the UDB contains built form guidelines for the street townhouses, stacked townhouses, back-to-back townhouses and the mid-rise buildings proposed through this development. Through this commentary, the importance of façade variety, building typology, focal buildings, and view terminuses are discussed. As well, Section 4.6 contains architectural design criteria for each building typology proposed within the development, ranging from main entrances, architectural detail, exterior materials and colours, windows, roof forms, garages, landscaping, and utility and service elements.

Town Planning Comment No. 3 (Park Facility Fit Plans):

The Town comments request submission of a facility fit plan for each of the Park Blocks (Blocks 24 and 25). Follow up clarification on the Town's specific requirements for these future park blocks was obtained from staff of the Community Services Department (Facilities and Parks Division) on January 14, 2019. Specifically, the Town identified amenities to be included within Block 24 (intended as the dog park) and within Block 25 (intended as the neighbourhood park).

In response to these details, a Conceptual Facility Fit Plan (prepared by Alexander Budrevics & Associates Limited) is included in this resubmission (Figure 6: Conceptual Park Facility Fit Plan) and details the possible layout of amenities for each park block, consistent with Town requirements. Specifically, Block 24 (dog park) includes the following amenities:

- Paved parking for 11 spaces;
- 2 access points off Street 'B';
- Fencing around perimeter and gate entry for dogs; and
- Shade trees (can be refined).

In addition, staff had indicated a desire for two separate areas for the dogs (one area for smaller dogs and one area for the larger dogs), a shade feature/social area for the pet owners, benches, different forms of topography such as gentle hills, rock cluster formations, tunnels, agility features, a water feature, drinking water facilities, washing station, trail loop, proper signage and waste disposal. Indeed, any and all of these features can be accommodated and incorporated at the detailed design stage for Park Block 24.

Park Block 25 (Neighbourhood Park) proposes the following amenities:

- Paved parking for 16 spaces;
- 2 access points off Street 'B';
- Play structure areas for junior and senior children;
- Plaza with shade shelter;

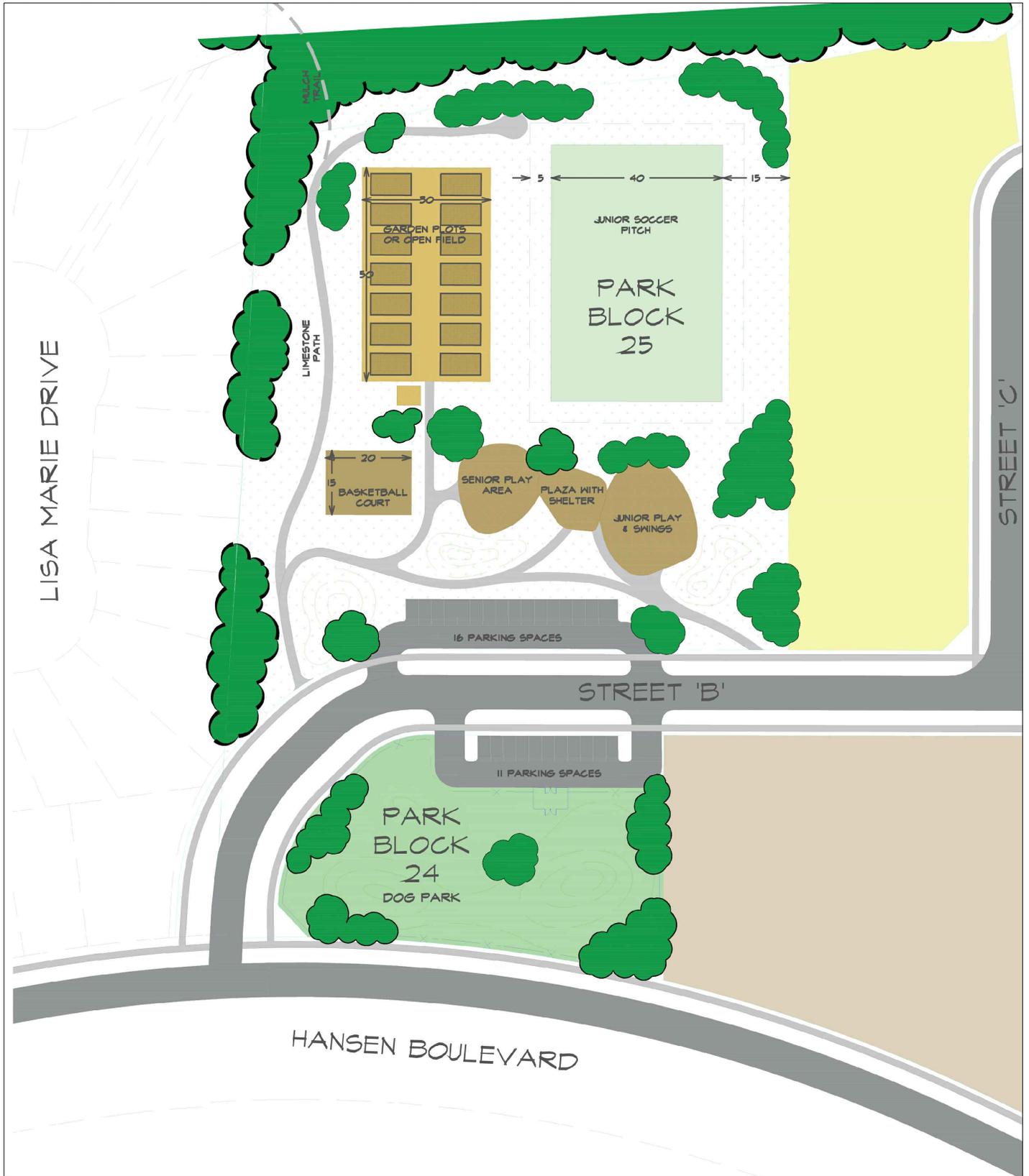


FIGURE 6
CONCEPTUAL FACILITY
FIT PLAN



Scale NTS
April 2019

- Multi-purpose hard surface court (labelled as ‘Basketball Court’);
- Grassed active sports field (labelled as ‘Soccer Pitch’)
- Garden Plots (or open field);
- Integrated trail system; and
- Landscaping, trees and shrubs (can be refined).

In addition, staff had suggested a splash pad facility, a washroom building, park benches, signage, waste receptacles and bicycle racks for this neighbourhood park block. Further discussion with Staff during detailed design will occur and these amenities can be incorporated, as desired.

In their comments, Community Services Department staff also indicated a desire for a signalized access at the proposed new entrance into the development where the current dog park parking is located (at east side of site), as it would allow for the future residents to access the existing trail on the south side of Hanson Boulevard in a safe manner. A signalized intersection is proposed at the eastern end of the site, opposite Victor Large Way at Hansen Boulevard. This intersection will ultimately facilitate enhanced pedestrian and active trail opportunities between the subject lands and lands to the south of Hansen Boulevard. This is discussed in greater detail below, under Town Comment No. 11 (Trails).

Town Planning Comment No. 4 (Built-Form Concept for Multi-Unit Blocks)

A Preliminary Development Concept Plan for the site showing a possible built form layout for the multi-unit blocks within the Plan of Subdivision is attached as Figure 1A (Preliminary Development Concept Plan) to this report (excerpted from UDB, John G. Williams Limited). As noted in the UDB, the apartment buildings will be designed to respect the importance of their prominent locations along Hansen Boulevard, while serving as a transition to lower density residential uses to the north, west and south. Emphasis has been placed on appropriate transition of height between new and existing built form through consideration of separation distances and setbacks to property lines.

Town Planning Comment No. 5 (Compatibility and Conformity of Built Form)

This Town comment requests additional details related to the specific housing types proposed and their specific relationships to existing surrounding development and conformity to the Official Plan policies. Specifically, the Town has requested that the compatibility of the proposed apartment blocks with surrounding existing residential development be addressed, including conformity with the applicable policies of the Official Plan.

The Official Plan encourages strategic and well managed density, design and land use to achieve sustainability in all community-building decisions. When considering development proposals, it must be demonstrated that the development is compatible and appropriate for the area. The surrounding residential neighbourhood to the west and south is characterized by predominantly single detached, semi-detached and townhouse dwellings on varying sizes of lots. The lands to

the north of the subject lands (north of the proposed Open Space / Natural Heritage System Block) consists of estate residential uses within the neighbouring Town of Mono. As noted earlier in this report, the current planning permissions for this site contemplate a mix of built forms including townhouses and apartment buildings, and this mix is required in order to achieve the prescribed density range on site of 75-99 units per net residential ha.

As illustrated on Figure 1A (Development Concept Plan), in addition to the proposed 93 street townhouses and 26 back-to-back townhouses, there are two blocks related to a total of 88 condominium stacked townhouses and two blocks related to five apartment buildings, proposed to accommodate 334 apartment units in total. As noted previously, the Town's Official Plan contemplates development consisting of a mix of residential built forms, including row / townhouses and apartments with a minimum density of 75 units per hectare and a maximum density of 99 units per hectare. It should be noted that a mix of built forms has been proposed on this site for the specific purpose of achieving the minimum density within the range prescribed in the Official Plan.

Street townhouses and back-to-back townhouses have been proposed throughout the central portion of the Plan. This built form is most compatible in this location due to the fact these forms front onto the less travelled portions of the interior road network proposed for the development. The street townhouses are a medium density building form with front-facing attached garages accessed from Streets 'C', 'D', and 'E' on the proposed Plan. This interior portion of the Plan contains a road network which is not anticipated to be frequently travelled and will ultimately function as a local road rather than an arterial road. Because of this street layout, consideration should be given to this proposed townhouse layout. Further, the north limit of the proposed development is adjacent to the Open Space lands and the proposed townhouses along this limit will serve as a transition from the Open Space lands to the development. The rear yard setbacks for those street townhouse units along the northern limit of the development limit are proposed to be 6.0 metres in depth. These reduced setbacks will be adjacent to the open space block and are meant to assist in facilitating grading outside of the open space block. As noted in the EIS (Azimuth, April 2019), there are appropriate buffers at the rear of these townhouse lots to the natural heritage features within Block 28 (NHS). These buffers will be planted with native self-sustaining vegetation and dedicated to the public authority. The EIS and MP (Azimuth, April 2019) provides additional detail related to the buffers to the identified natural heritage features.

This site is geographically unique, so it is appropriate to consider an alternate built form along the east and west limits and along Hansen Boulevard to the south. Blocks 20 and 21 (condominium stacked townhouses) are located at the east and west ends of the proposed development. The stacked townhouses represent a compact, transit-supportive, built form that yields higher densities than typical townhouses, provides an appropriate transition between low- and mid-rise built forms and helps to conserve valuable land resources. Stacked townhouses add to the diversity of built form in the community, provides an affordable housing alternative and contributes to residential intensification. Each block is proposed to be laid out to front Street 'C' with parking and an associated landscape strip along the front of the blocks. For both Blocks, there are proposed to be 2 outlets for the vehicles to access the lane and parking area from Street 'C'.

The condominium stacked townhouse blocks are anticipated to serve as a transition from the proposed street townhouses and interior local roads to the more frequently traveled Street 'B' and Hansen Boulevard to the south. Further, these blocks will serve as a transition from the proposed park block and existing low density residential to the west and the existing channel and Orangeville Mall to the east.

The back-to-back townhouses are typically 3 storeys with front facing garages accessed from a public or private road (in this case, Street 'C' and Street 'D'). There is a common demising wall along the rear of the unit in addition to the traditional interior side walls. As well, private amenity space is provided in the form of a balcony typically located above the garage. This built form also represents a compact, transit-supportive, built form that yields higher densities than typical townhouses, and will provide an appropriate transition between the stacked townhouses to the west, the mid-rise apartments to the south and the street townhouses on the balance of the site.

On Blocks 22 and 23 five apartment buildings with heights of five and six storeys are proposed. These Blocks have been strategically located to be adjacent to Hansen Boulevard which is a Major Collector Road. Locating this compact built form in close proximity to commercial activities, and transit and active transportation along Hansen Boulevard represents a compatible and efficient use of land and resources. It further promotes the use of active transportation and public transportation. As noted in the Urban Design Brief, the design of the buildings will relate to a pedestrian scale and provide for appropriate transitions in height and separation with neighbouring low rise built form (townhouses) to ensure adequate sunlight and sky views are maintained for surrounding streets and buildings. There is one level of below grade parking and a certain amount of at-grade parking related to these apartment buildings. Surface parking areas will be strategically located to the rear of buildings and screened from street view (using landscaping), where possible.

The proposal includes a mix of building forms and the layout has been designed in such a way as to provide generous parkland blocks and a large open space block along the western and northern periphery of the site. Further, a channel block and a stormwater management block are located along the eastern periphery of the site. Essentially, the only direct interface of built form associated with this development and existing uses is along Hansen Boulevard, where five apartment buildings are proposed. Locating these apartment buildings along the Hansen Boulevard frontage of the subject property achieves a number of factors which help ensure the overall compatibility of this built form in this location, as follows:

- The buildings have been conceptually located to address Hansen Boulevard while minimizing visibility of surface parking areas
- The buildings are in close proximity to transit services along Hansen Boulevard to provide a sense of "human comfort" and pedestrian scale and interest;
- The proposed development has been appropriately integrated with surrounding land uses and promotes a safe, convenient and barrier-free pedestrian travel within the site and to transit stops;

- Off street parking and loading will be minimally visible from the public realm. One level of below grade parking is proposed. Loading will be situated to the rear of building and will be appropriately screened from the adjacent streets and will minimize and/or avoid any conflict with pedestrians;
- Architectural design treatment and facades will be well-articulated and will provide ample fenestration facing public areas.

It is noted that while the scale and built form of the apartment blocks may be “different” than the existing surrounding development (i.e. building size, form and height) it is noted that the proposed redevelopment is compatible with the surrounding area. The proposed apartment buildings have been positioned to provide a strong streetscape presence along Hansen Boulevard to the south and to Street ‘B’ and ‘C’ interior to the Plan. The Development Plan layout also locates the more utilitarian elements of the development such as the entrances to the underground garage, refuse pick-up and service entrances to the rear of the building away from the public realm. Ample setbacks have been provided in the design layout including an increased building setback and landscape buffer along the Hansen Boulevard frontage.

It is important to note that the separation distance between existing development to the east, west and north and the proposed development is adequate and typical for greenfield development. While the consideration of existing development and uses in close proximity is important, it is equally important that existing, older developments such as the low-rise residential development to the west and south not be used as a benchmark for new development within a greenfield area designated for Medium Density Residential development. Furthermore, it is important that the Orangeville Mall lands to the east, which have future development potential, not be used as a benchmark for this new development, either. Otherwise, the desired objectives for growth and intensification as envisioned by County and Provincial policies will not be achieved.

Compatibility is achieved with the existing neighbourhood and planned development and there is a suitable distance between existing and proposed buildings to provide for a reasonable transition. In fact, the proposed development will co-exist in harmony with both existing and proposed development in Orangeville and will not result in a physical or functional adverse impact or pose an unacceptable risk to the environment and/or human health.

Town Planning Comment No. 6 (Functional Servicing Report)

A revised Functional Servicing Report (Urbantech, April 2019) is included in this resubmission and satisfactorily addresses comments from commenting agencies, including the Town of Orangeville and CVC. The purpose of this revised report is to provide functional servicing design information in support of the proposed Draft Plan of Subdivision. This report demonstrates how the proposed development complies with the Town’s Official Plan (Section H regarding municipal services), the Town’s Engineering Design Criteria as well as the Credit Valley Conservation (CVC) environmental standards. Specifically, this report outlines the development constraints on site, and demonstrates how site grading details have been incorporated into the design layout, demonstrates how storm drainage and stormwater

management are satisfactorily addresses, and confirms sufficient sanitary servicing capacity and water distribution.

Town Planning Comment No. 7 (Traffic Impact Study)

A Traffic Impact Study Response (Paradigm, April 2019) is included in this resubmission and satisfactorily addresses comments from commenting agencies, including the Town of Orangeville's consultant Triton Engineering and the Town of Mono. The response outlines the background study completed on behalf of the Town of Orangeville entitled "Hansen Boulevard Functional Design Study" (April 2008) (herein referred to as 'FDS'). This study was completed by Triton Engineering on behalf of the Town of Orangeville and provided an assessment of Hansen Boulevard in the context of anticipated future developments along the roadway, including the subject lands. The study concluded that the design of Hansen Boulevard is feasible and will meet the future transportation needs of the Town of Orangeville. As well, the study provides a functional design plan which details the required vehicle and bike lane configurations.

The May 2018 Transportation Impact Study (by Paradigm Transportation) (herein referred to as 'TRIS') prepared for the proposed Draft Plan of Subdivision (based on previously proposed 623 units) was prepared consistent with the approved Terms of Reference (approved by the Town's consultant in March 2018) and summarizes the anticipated traffic impacts to the Hansen Boulevard corridor from First Street to Blind Line. That study confirms that the study area intersections are forecast to operate with acceptable levels, no changes to the Hansen Boulevard cross-section are recommended at this time and, with an unwarranted traffic signal being implemented at the Hansen Blvd and Victor Large Way intersection, the proposed development will meet all required traffic levels and will operate successfully. It is important to note that these findings are consistent with the overall findings contained in the Town's 2008 FDS. Further, with the April 2019 revised unit count proposed at 541 units, this analysis is considered very conservative and overestimates the anticipated future traffic demands, reinforcing the anticipated successful traffic operations and intersection operations once this project is fully built out.

In this resubmission, Paradigm has prepared a Response to Comments document to provide additional clarification to respond to Triton Peer Review comments and public comments to the May 2018 TRIS. In response to Peer Review comments, the Response to Comments document provides additional information related to vehicular trips anticipated from the park blocks, acknowledges that no refinements to the trip generation are warranted, and provides additional clarification related to the traffic signals proposed at the intersection of Victor Large Way and Hansen Boulevard. In response to public comments, the Response to Comments document reiterates conclusions and recommendations from the 2008 FDS (completed on behalf of the Town) and the 2018 TRIS (completed on behalf of the applicant). The response also clarifies that additional traffic is not anticipated to utilize Starrview Crescent as it is a cul-de-sac with limited access.

Town Planning Comment No. 8 (Water Balance / Hydrogeological)

A response to comments related to the Hydrogeological Assessment (Azimuth Consulting Limited, April 2019) and a Revised Hydrogeological Update Report (April 2019) are both included in this resubmission and satisfactorily address comments from commenting agencies, including the Town of Orangeville CVC and members of the public. As noted in the letter response prepared by Azimuth, a revised Feature Based Water Balance has been provided in the Revised Hydrogeological Update Report (April 2019) which addresses CVC comments and also incorporates LID's which are presented in the Urbantech FSR. It is noted by Azimuth that LID's and taking into account snowmelt will achieve an overall balance of groundwater infiltration.

Specifically, it is noted in the Hydrogeological Update and in the FSR (Urbantech) that based on the proposed development plan, impervious surfaces will comprise roughly 44% of the overall property (i.e. rooftops, roads, driveways etc.). The proposed Low Impact Development practices will allow the post-development infiltration rates to remain very close (within 5%) to the pre-development rates, such that the net effect is negligible to the existing groundwater conditions. For example, a 5% deficit equates to 15mm/year/m², which would theoretically reduce the water table elevation by 5-15mm. Further, typical seasonal groundwater fluctuations are in the range of 1.5-2.0 mm. As well, it is noted in the Hydrogeological Update that unaccounted for snowmelt will likely make up any difference.

Town Planning Comment No. 9 (Tree Inventory and Preservation Plan)

A revised Tree Inventory and Preservation Plan (Kuntz Forestry Consulting Inc., April 2019) is included in this resubmission and satisfactorily addresses comments from commenting agencies, including the Town of Orangeville and CVC. Specifically, this report and plan provides a discussion and analysis of development impacts, tree removal and tree preservation relative to the proposed development. It is noted that many of the trees along the western limit of the property are comprised of Manitoba Maple which are exhibiting leaning and poor unions. In light of the fact these trees are located in proximity to the proposed Park Block (Block 25), these leaning trees have been identified for removal. It is also important to note that the EIS (Azimuth, April 2019) outlines that woodland compensation is proposed along the western limit of Park Block 25. The Restoration Plan will include planting specifications for this proposed woodland compensation area in addition to the buffer lands. The restoration area has been included in a Figure 3 (Environmental Constraints) in the Azimuth EIS and MP Addendum and consist of approximately 0.11 ha.

Town Planning Comment No. 10 (Environmental Impact Study)

An Environmental Impact Study Response (Azimuth, April 2019) is included in this resubmission and satisfactorily addresses comments from commenting agencies, including the Town of Orangeville and CVC. Specifically, Sections E 5.3.15 and E 5.3.16 of the Town's Official Plan have been discussed and demonstrate that the boundaries of the natural features and

ecologic and hydrologic functions will be protected and, where necessary, restored to a natural condition and that the location, sizing and preliminary design of all stormwater management facilities is appropriate and feasible for the proposed development. The 2018 EIS & MP report (Azimuth, May 2018) and the responses contained in the April 2019 Response document provide a detailed assessment of any potential impacts to the natural heritage features and outline mitigation, restoration and enhancement measures for the proposed development.

Town Planning Comment No. 11 (Trails)

This Town comment refers to the Orangeville Parks Master Plan (Trails Plan) and recommends a primary trail system comprised of a paved multi-use trails system looping north of Hansen Boulevard through the northern portion of the site. The Town comments further require that potential impacts associated with any such trail system are adequately addressed within the Environmental Impact Study to the satisfaction of the CVC in order to satisfy Policy E 5.3.8 of the Official Plan.

In an effort to balance Town and CVC interests related to the trail system for these lands, meetings were convened with Town staff and CVC staff to discuss the trail opportunities, objectives and constraints. As well, the applicant has provided comments to the Town (and their consultant, Dillon Consulting) in connection with the Town's current preparation of the revised Cycling and Trails Master Plan (letter dated January 15, 2019 and attached as Appendix A to this report).

Similar to the Town's existing Trails Plan (GSP, 2015), the January 2019 Draft of the Town's Cycling and Trails Master Plan (prepared by Dillon Consulting) illustrates a "Primary Trail System" conceptually traversing the perimeter of the subject lands and consisting of a multi-use paved trail. On the draft Master Plan, this trail appears to follow the western, northern and eastern limits of the subject property. Taken literally, this would require traversing the natural heritage system block along the northern limit of development on the subject lands. The natural heritage system consists of a CVC Regulated Area that is traversed by Middle Monora Creek, a known coldwater system with Brook Trout, and a portion of the Orangeville Provincially Significant Wetland Complex. Furthermore, the woodland within this block is considered to be significant. These features are identified and discussed within the 2018 EIS and MP (and within the 2019 EIS Addendum Response prepared by Azimuth) for the proposed subdivision in addition to the setbacks (i.e. buffers) that are required in order to adequately protect the identified features. It is suggested that it would be more appropriate to locate the trail within the interior road network of the Plan of Subdivision, where possible, which would achieve the Town Trail objectives while not disturbing or impacting the natural heritage system.

The proposed trail system within the Plan of Subdivision is shown on Figure 7 (Trail Plan). Consultation with Town staff has confirmed that maintaining and enhancing trail connections throughout the Town is integral to this Master Plan. Accordingly, the proposal for trails within the subject Draft Plan achieves key connection points at Amelia Street and Hansen Boulevard, Victor Large Way and Hansen Boulevard, Brucedale Boulevard and the subject lands, and along the northern limit of development on the subject lands, within the roadway and along sidewalks.



**FIGURE 7
TRAIL PLAN**



Scale NTS
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As well, the existing multi-use path along Hansen will be utilized to provide connectivity to the east and west of the subject lands.

In light of the fact the draft Cycling and Trails Master Plan recommends implementation of a multi-use paved trail, it should be acknowledged that the detailed work regarding trail locations has not been completed. This is significant as it relates to introducing a widened/paved trail through the woodland/wetland/watercourse along the northern limits of the development portion of the subject lands. Specifically, significant woodland and PSW wetland exists to the west and north of the subject property and a trail of this nature will not be ecologically supported in this location. Accordingly, as shown on Figure 7 (Trail Plan), it is proposed that the trail be incorporated in the internal road system by following the northern limit of Street 'C', and then proceed within the Park Block (Block 25). This will ensure that there is no encroachment of paving and trail through the natural heritage system north of the development limits.

4.5 Response to Public Comments (as summarized in November 29, 2018 comment letter from Town of Orangeville)

In the Town comments of November 29, 2018, a summary of public comments received (including those received at the Public Meeting of September 10, 2018) was provided. Below is a review and response to those comments:

Concerns raised regarding the perceived overly compact density of the proposal. The community suggests that a slightly lower density will further moderate any potential impacts, i.e. "less density means less impacts".

The May 2018 submission related to the Draft Plan of Subdivision proposed an overall density of 97 units per hectare, which consisted of a total of 623 units on the Plan. This April 2019 resubmission proposes a reduced overall number of units proposed within the Plan area to 541 units in total and this equates to a proposed overall density of 89.1 units per net residential hectare.

It important to note that both proposals are consistent with the Town of Orangeville's Official Plan and, more particularly, the site-specific policy for the subject lands which was approved by Orangeville Council in 2009 in connection with Orangeville's conformity exercise, triggered by the Province's 2006 Growth Plan. Specifically, the Official Plan permits a minimum density of 75 units per ha and a maximum density of 99 units per ha on the subject lands.

Notwithstanding the previous Plan's density conformity with the Official Plan, it is proposed to reduce the overall number of units on the proposed plan in an effort to respond to public comments and concerns about the proposed density. However, the development proposal must still meets the Official Plan objectives and policies for growth management and, accordingly, the development proposal continues to propose a mix of unit types including the apartment units within the Plan area.

Concerns raised regarding water quality and quantity impacts to groundwater resources and seeking clarification on whether any low-impact development measures will be included in the development.

A response to this public comment is contained within the Response to Comments letter prepared by Azimuth (April 2019) related to the Hydrogeological Update Report. It is noted that additional information related to LID's (low impact development measures) are included in the Hydrogeological Update Report (Azimuth, April 2019) and in the FSR (Urbantech, April 2019). Low Impact Development practices are proposed to be implemented throughout the site to promote groundwater recharge. The proposed LID practices include infiltration trenches/soakaway pits in the front and rear yards of lots (which were approved and implemented in Phase 1 on the south side of Hansen Boulevard) and directing drainage from impervious surfaces to pervious areas. However, various other practices will be evaluated during the detailed design stage of the project; these designs will be submitted to the Town of Orangeville and Credit Valley Conservation for review and approval prior to any construction activities.

In terms of water quality, it is noted by Azimuth that the proposed development would have limited sources of contaminants which would contribute to the impairment of the shallow ground water in the area and water quality impacts would provide limited influence relative to the entire watershed.

Concerns raised regarding the amount of impermeable area being introduced as a result of the proposed development and resulting reduction in groundwater recharge. These concerns relate potential impacts to the groundwater table and implications for surrounding residential lands to the north of the site in the Town of Mono who rely on private wells.

As outlined in the Hydrogeological Update Report (Azimuth, April 2019), based on the proposed development plan, impervious surfaces will comprise roughly 44% of the overall property (i.e. rooftops, roads, driveways etc.); however, the proposed Low Impact Development practices will allow the post-development infiltration rates to remain very close (within 5%) to the pre-development rates, such that the net effect is negligible to the existing groundwater conditions. For example, a 5% deficit equates to 15mm/year/m², which would theoretically reduce the water table elevation by 5-15mm; typical seasonal groundwater fluctuations are in the range of 1.5-2.0m.

Concerns raised about impacts to wildlife and natural heritage features. Specific concerns related to the subject lands potentially containing habitats of threatened or endangered species despite survey and findings contained in Environmental Impact Study. Additional specific concerns have been raised regarding the elimination of existing habitat of wildlife within the subject lands. It has also been suggested that the proposed development lands serve as a connecting link between the natural areas within the northern portion of the site and existing natural areas to the south of the property (opposite to Hansen Boulevard) and the development of these lands will sever this connecting corridor and result in negative impacts to wildlife in the area.

Azimuth's April 2018 EIS and MP for Orangeville Highlands Phase 2 in conjunction with the April 2019 EIS Response Document have identified the boundaries of the natural features and ecologic and hydrologic functions to be protected and the areas to be restored to a natural condition. Appropriate buffers have been applied to these features which will be planted with native self-sustaining vegetation and dedicated to the public authority.

As noted by Azimuth in their April 2019 EIS and MP Response document, the Ministry of Natural Resources (MNR) has been consulted to determine Species at Risk (SAR) that have the potential to occur on the property and within the general area. The Azimuth SAR assessment within the 2018 EIS & MP revealed two species present / utilizing the subject lands which are protected according to Ontario's *Endangered Species Act*, including the Eastern Meadowlark (Threatened) and the Butternut (Endangered). Pursuant to Provincial legislation, before beginning any part of the development activity, the proponent must prepare a development plan and submit it to the Ministry. It is required that any development activity be carried out in accordance with the development plan. In order to ensure compliance with the ESA, the proponent will continue its dialogue with the Province and will submit the required development plan to the Ministry. The proponent has committed to sharing all data and submissions with the Province and with CVC, as well.

Additional details related to the potential significance of the natural heritage features and functions associated with the property is provided in the 2018 EIS and MP report (Azimuth) and in the April 2019 EIS and MP Response Document. It is integral to this development proposal to outline that the northern portion of the property (6.24 ha) will be maintained within the Town's Natural Heritage System and will be dedicated into public ownership.

Concerns with the proposed design and visual impacts of the proposed development. The community would like to see high-quality built-form design. Concerns raised with the concept plan presented at the public meeting relate to the extent of surface parking, building orientation, etc. Concerns were also raised regarding the long-term maintenance and integrity of the development.

The proposed Plan of Subdivision has been designed to be an attractive, transit-supportive neighbourhood, appropriately designed to fit into the urban fabric of Orangeville. An Urban Design Brief (UDB) has been prepared by John G. Williams Limited (April 2019) which has been designed to provide fundamental community design principles and guidelines that will assist in the creation of this compact, pedestrian-scaled, mixed-density neighbourhood. The UDB also provides architectural design criteria to guide the design, siting and approval of new buildings through a recommended architectural control process. The primary focus is to promote quality urban design that contributes to placemaking through the integration of land use, built form and the public realm.

Section 4.1 of the UDB provides commentary and renderings / illustrations related to the architectural character of the proposed development. It is noted that Architectural form and style shall complement the design of the public realm and landscaping treatments to create a vibrant public realm. It is recommended that building elevations shall display a considerable degree of

variety and façade articulation and that blank façades which are visible to the public should not be permitted. The goal is to allow for sufficient design variety that results in a high quality character with a coherent identity that respects and is relevant to the character of Orangeville.

Section 3.2 of the UDB contains commentary regarding the public realm, which is a vital component of the proposed development. Through this discussion it is confirmed that the proposed development will provide a functional, safe, sustainable, and attractive neighbourhood environment, well articulated streetscapes with landscaped boulevards, a network of streets that accommodate multi-modal choices for pedestrians, cyclists, and vehicles, and pedestrian linkages that connect the residential population to adjacent neighbourhoods, open space areas and commercial facilities. The open space block, park blocks and trail are discussed in the context of contributing to the identity of the community, sustainability, connectivity, and promotion of an active lifestyle.

The UDB uses renderings, photographs, commentary and massing plans to deliver the detailed analysis, assessment and recommendations for the proposed design and built forms within the report. The report explores built form within existing neighbourhoods in the vicinity of the subject property and refers to the broad mix of lot sizes, built forms and dwelling types that are proposed for the proposed development.

Concerns raised about the application review and approval process. Concerns expressed a perception that the process intends to implement growth assigned by the Province and does not respect local interests or the desires of the community. The Official Plan Amendment application redesignation is perceived to represent a blank canvass, giving permission for the proponent to do whatever they wish.

As noted above, the development proposal is consistent with the Provincial Policy Statement and conforms to the Province's Growth Plan, Dufferin County Official Plan and Town of Orangeville Official Plan. Planning applications must be consistent with the Provincial Policy Statement and must conform to the Province's Growth Plan.

As noted above in commentary under Town Planning Comment No. 1 (Density), the measurement of the minimum density target is measured for areas within the applicable municipal official plan and, in the case of the subject lands, a site-specific density range of 75-99 units per ha has been prescribed.

Furthermore, it is noted that permitted uses for lands within the "Residential" land use designation include single detached, converted dwellings, semi-detached dwellings, duplex dwellings, triplexes, quadruplexes, and multi-family housing including row/townhouses and apartments.

As already noted, the subject property is designated "Medium Density Residential" on Schedule "C" (Residential Density Plan) (Figure 4). The Town's Official Plan permits row/townhouses and apartments with a maximum density of 99 units per net residential hectare in the "Medium Density Residential" designation. Further, as noted already, the subject lands are also subject to

a Site-Specific Policy, as shown on Figure 5. Section E 8 notes the following as introduction to the Site-Specific Policy section in the Official Plan:

“E 8 Policies for Specific Areas

The following Policies apply to specific areas of the Town, where additional detailed policies are required to indicate the intent of Council for the use of land. The location of the lands to which these policies are applied are indicated on Schedule B to the Official Plan and are identified with the appropriate Section numbers as follows:”

“E 8.66

Notwithstanding the Medium Density Residential designation of the lands located on the north side of Hansen Boulevard, west of First street, that lands shall develop at a minimum density of 75 and a maximum of 99 units per net residential hectare. (OPA 103)”

Clearly, the subject lands (in their entirety, as mapped on Figure 5) are required to develop at a specific density range of between 75 and 99 units per net residential hectare. It is also important to note that the notation “[OPA 103]” appears immediately following the text of the section. That notation refers to the enactment by the Town of OPA 103 enacted in 2009. The enactment of OPA 103 was a specific exercise undertaken by Council to bring the Town’s Official Plan completely into conformity with the 2006 Growth Plan.

Accordingly, the proposed overall development conforms with the Town of Orangeville Official Plan density policies as the proposed overall density of the development is 89.1 units per net residential hectare.

Concerns regarding traffic impacts resulting from the proposed development. Specifically, concerns with how the operations of the 1st Street and Highway 10 intersection and the Hansen Boulevard and 1st Street intersection will be impacted by the additional traffic generated by the proposed development. Concerns were also received about the lack of an assessment completed for the 1st Street and Highway 10 intersection provided within the Traffic Impact Study.

In responding to this comment, it is important to understand the background study completed on behalf of the Town of Orangeville entitled “Hansen Boulevard Functional Design Study” (April 2008) (herein referred to as ‘FDS’). This study was completed by Triton Engineering on behalf of the Town of Orangeville and provided an assessment of Hansen Boulevard in the context of anticipated future developments along the roadway, including the subject lands. Specifically, this study assessed Hansen Boulevard in the context of future traffic demand, traffic operations, intersection locations and the provision of bike lanes. Since the Draft Plan of Subdivision application for the subject lands was not yet submitted to the Town of Orangeville when this study was completed, the Town was required to assign an estimate of units anticipated for the subject lands. It is confirmed that the 2008 FDS study anticipated an estimated 407 units for the subject lands. The study concluded that the design of Hansen Boulevard (consisting of a three

lane cross section) is feasible and will meet the future transportation needs of the Town of Orangeville. As well, the study provides a functional design plan which details the required vehicle and bike lane configurations.

The May 2018 Transportation Impact Study (by Paradigm Transportation) (herein referred to as 'TRIS') prepared for the proposed Draft Plan of Subdivision (based on previously proposed 623 units) was prepared in accordance with approved Terms of Reference (as approved by the Town's Consultant in March 2018) and summarizes the anticipated traffic impacts to the Hansen Boulevard corridor from First Street to Blind Line. That study confirms that the study area intersections are forecast to operate with acceptable levels, no changes to the Hansen Boulevard cross-section are recommended at this time and, with an unwarranted traffic signal being implemented at the Hansen Blvd and Victor Large Way intersection, the proposed development will meet all required traffic levels and will operate successfully. With the April 2019 revised unit count proposed at 541 units, this analysis is considered very conservative and overestimates the anticipated future traffic demands, reinforcing the anticipated successful traffic operations and intersection operations once this project is fully built out.

The applicant's 2018 TRIS acknowledges the conclusions and recommendations of the Town's 2008 FDS and updates the unit count for the proposed development, along with anticipated trip generation rates. Specifically, the 2018 TRIS uses the newer 10th edition Trip Generation Manuel (by the Institute of Transportation Engineers) rather than the 7th edition which the Town's 2008 FDS used. As well, the 2018 TRIS and used a multi-family housing code in their modeling which produces higher volumes compared to the 2008 FDS. Moreover, the trip generation rates used in the 2018 TRIS were determined to be satisfactory by Triton Engineering in their peer review of the study on behalf of the Town.

In this resubmission, Paradigm has prepared a Response to Comments document to provide additional clarification to respond to Triton Peer Review comments and public comments to the May 2018 TRIS. In response to Peer Review comments, the Response to Comments document provides additional information related to vehicular trips anticipated from the park blocks, acknowledges that no refinements to the trip generation are warranted, and provides additional clarification related to the traffic signals proposed at the intersection of Victor Large Way and Hansen Boulevard. In response to public comments, the Response to Comments document reiterates conclusions and recommendations from the 2008 FDS (completed on behalf of the Town) and the 2018 TRIS (completed on behalf of the applicant). The response also clarifies that additional traffic is not anticipated to utilize Starrview Crescent as it is a cul-de-sac with limited access.

As well, in response to concerns raised regarding the intersection of First Street and Hansen Boulevard, it is noted that the 2008 FDS examined this particular intersection and noted that while the intersection will operate at a good level of service during the Weekday AM peak, lower levels of service are anticipated during the Weekday PM peak. The 2008 FDS concludes that the planned Hansen extension to Highway 10 will improve this situation by redistributing traffic, resulting in acceptable levels of service at this intersection. It is noted that the Hansen extension to Highway 10 has been the subject of a Class EA and is planned and recognized in the

Town's Official Plan (Schedule E"). Once this connection is completed, the redistribution of traffic will reduce volumes at this intersection.

Questions and concerns have been raised regarding the long-term financial impacts to the Town that would result from the proposed development and corresponding influx of population growth that will result. Specifically, what will the impacts be to existing infrastructure (i.e. roads, servicing), community service facilities, schools, emergency services, medical services, etc.?

The Official Plan is intended to ensure that the Town of Orangeville evolves, improves and realises its full potential in areas such as transit, land use development, and the environment. The Town of Orangeville Official Plan provides direction and support for general land use and long-term growth and development in order to meet the needs of the community. The proposed development is in conformity with the vision for these lands as set out in the Town's Official Plan. As already noted, the subject lands are designated "Residential", "Open Space Conservation", and "Open Space Recreation" on Schedule 'A' (Land Use Plan) in the Orangeville Official Plan (Figure 3). Further, the lands designated "Residential" are further identified as "Medium Density Residential" on Schedule 'C' (Density Plan) (Figure 4).

In support of the development proposal (which is simply implementing the Official Plan) technical studies have been completed and submitted to confirm that existing infrastructure (including roads and servicing) is either sufficient to accommodate the proposed development or shall be improved upon to ensure adequate services for the proposed development, as well as existing land uses. For example, the Transportation Impact Study recommends that the site can be adequately serviced through utilization of the existing road network and that an unwarranted traffic signal can be implemented at the intersection of Victor Large Way and Hansen Boulevard to ensure above-satisfactory traffic flow to and from the proposed development. As well, the FSR confirms storm sewer routing alignments are available to convey post-development flows to a SWM facility on the south-east corner of the site which ultimately discharges to an existing drainage feature connected to the Middle Monora Creek which will be designed to treat and control stormwater flows up to and including the 100-year event. As well, the FSR confirms that sanitary sewers for the proposed development will drain to the existing 300mm diameter sanitary sewers on Hansen Boulevard and the proposed watermain infrastructure will be looped at the two access points to the site and will adequately connect into the existing watermain on Hansen Boulevard. It should be noted that the receiving 300 mm diameter sanitary sewer system was designed to accommodate the ultimate Phase II development (on the subject lands) and other developments to the west, according to the 2010 Front Ending Agreement between the Town and Orangeville Highlands Ltd.

Concern that the influx of new residential development is not being matched by an appropriate compliment of commercial and employment uses to create job opportunities for the new growth in population. Comments have expressed concern that Orangeville is perceived as a bedroom community with a large commuting population and this proposed development will further entrench this concept.

As noted above, the proposed development is implementing a vision for land use development that specifically requires medium density residential development on the subject lands. The Official Plan sets out different land use designations within the Town to achieve the requisite mix of land uses that will ultimately guide development within the Town to ensure an adequate compliment of residential, open space, institutional, commercial and employment uses within the Town.

Concerns raised regarding water and wastewater treatment capacity available within the Town's systems to accommodate the proposed development. Comments raised indicated that although the Town recently completed upgrades of its wastewater treatment system, no such upgrades have been completed to the water supply system and there are concerns about the timing and certainty of this endeavour relative to the proposed development.

As it relates to sanitary servicing, it is noted in the Functional Servicing Report (FSR) (Urbantech, April 2019) that the proposed development outlets to the existing sanitary manhole on Hansen Boulevard opposite of Victor Large Way. The FSR confirms that the receiving sanitary sewer system is a 300mm diameter sanitary trunk which has been designed to accommodate the ultimate development on the subject lands as well as other developments to the west. This is pursuant to the 2010 Front Ending Agreement between the Town and Orangeville Highlands Limited. As well, it is noted that it is the responsibility of the Town of Orangeville to review the proposed wastewater drainage and confirm that there is adequate capacity in the system. This approval to discharge must be obtained prior to any construction activities taking place.

As well, as it relates to water supply, it is noted in the FSR that the proposed development is supplied by a single pressure district. A looped system consisting of a 300mm diameter main and 200mm diameter local distribution pipes is proposed. Detailed design will ensure that the minimum hour, peak hour, maximum day, and fire flow requirements are met. As well, it is noted that detailed hydraulic modeling and flow testing for the proposed development will be completed at detailed design (prior to any construction activities) to ensure that there is adequate fire and domestic water supply available.

Concerns expressed with the architectural and design attributes of the concept plans and renderings presented at the public meeting. The apartment buildings do not have an aesthetically-pleasing architectural style. Comments received from the community expressed a strong interest in quality design and have requested that the proponent consider the following design enhancements and/or modifications:

It is noted that architectural renderings presented at the September 2018 Public Meeting were noted to be preliminary and conceptual and were intended to provide an example of what the apartment development may look like on the subject lands. Public comments were noted and it is acknowledged that there are differing opinions on what constitutes 'aesthetically-pleasing' style and architecture among approval authorities, the general public and the applicant.

It is noted that this latest resubmission includes a detailed Urban Design Brief (John G. Williams Limited, April 2019) which discusses the design vision and objectives of the proposed development. Specifically, it is noted that the vision is to create a compact, pedestrian-scaled, mixed-density neighbourhood with attractive streetscapes, ample public open spaces and a range of housing types.

- **The architectural design should fit with the design context of the “old town” look and feel of Orangeville.**

The UDB uses renderings, photographs, commentary and massing plans to deliver the detailed analysis, assessment and recommendations for the proposed design and built forms within the report. The report explores built form within existing neighbourhoods in the vicinity of the subject property and refers to the broad mix of lot sizes, built forms and dwelling types that are proposed for the proposed development. Architectural character is discussed in detail in Section 4.1 of the UDB report and notes that it will be derived from traditional / heritage-inspired precedents. The goal is to allow for sufficient design variety that results in a high quality character with a coherent identity that respects and is relevant to the character of Orangeville.

- **Balconies should be encouraged within the design of the apartment buildings.**

As noted in Section 4.4 of the Urban Design Brief (Mid-Rise Buildings), the design of the building should relate to a pedestrian scale and provide for appropriate transitions in height and separation with neighbouring low rise built form (townhouses) to ensure adequate sunlight and sky views are maintained for surrounding streets and buildings. As well, it is noted that façades should be well-articulated and provide ample fenestration facing public areas. A greater proportion of wall openings (windows, doors) to solid should be provided to reinforce a human scale environment, particularly at street level. It is noted that architectural design treatment (wall/roof articulation, doors, fenestration, materials/colours, detailing) should be consistent on all elevations to avoid uninteresting blank façades. Finally, it is specifically noted in the Urban Design Brief that *“Each apartment unit is encouraged to have private outdoor amenity space in the form of balconies and terraces to enhance the living environment of residents. These features should be large enough to comfortably accommodate space for seating. Direct access to ground-level suites from the street is encouraged.”*

- **Underground parking to be provided for the apartment buildings to minimize extensive surface-parking areas.**

One level of underground parking is proposed to accommodate parking for vehicles in the apartment blocks. As noted in Section 4.7.7 (Parking Areas) of the Urban Design Brief, parking requirements will vary by building type, but the primary objective is to mitigate the negative visual impact on the public realm associated with parking areas, driveways and garages. It is recommended that parking access points from the street should be well defined and that, where possible, surface parking should be located at the

rear of buildings. Where visible from the street, the parking area will be screened through the use of edge landscaping and/or architectural elements, such as decorative metal fencing with masonry piers. It is also noted that landscaped medians should terminate each parking aisle, where feasible.

- **Well-integrated walkways and bike paths are needed to interconnect the development, adjacent lands and the Orangeville Mall.**

Section 3.2 of the UDB contains commentary regarding the public realm, which is a vital component of the proposed development. Through this discussion it is confirmed that the proposed development will provide a functional, safe, sustainable, and attractive neighbourhood environment, well articulated streetscapes with landscaped boulevards, a network of streets that accommodate multi-modal choices for pedestrians, cyclists, and vehicles, and pedestrian linkages that connect the residential population to adjacent neighbourhoods, open space areas and commercial facilities. The open space block, park blocks and trail are discussed in the context of contributing to the identity of the community, sustainability, connectivity, and promotion of an active lifestyle.

The proposed trail system within the Plan of Subdivision is shown on Figure 7 (Trail Plan). Consultation with Town staff has confirmed that maintaining and enhancing trail connections throughout the Town is integral to the Town's Master Trail Plan. Accordingly, the proposal for trails within the subject Draft Plan achieves key connection points at Amelia Street and Hansen Boulevard, Victor Large Way and Hansen Boulevard, Brucedale Boulevard and the subject lands, and along the northern limit of development on the subject lands. It is proposed that the trail be incorporated in the internal road system by following the northern limit of Street 'C', and then proceed within the Park Block (Block 25). This will ensure that there is no encroachment of paving and trail through the natural heritage system north of the development limits. As well, the existing multi-use path along Hansen will be utilized to provide connectivity to the east and west of the subject lands (including direct access to the side door of the Orangeville Mall, which faces Hansen Boulevard).

- **Consider ground-level commercial uses such as medical, real estate, financial services or other offices, cafés, patios, etc. for reconfigured apartment building units oriented to abut Hansen Boulevard. These uses would compliment the Orangeville Mall and give the area a “community” feel to attract shoppers to this area of town. Orangeville is to be a complete community where people can live, work and play and the proponent should pursue a development plan that supports this concept.**

It is noted that the subject lands are not currently designated (or envisioned) to contain mixed uses or ground floor commercial or service commercial uses. Accordingly, an amendment to the Official Plan would be required to implement these types of uses on the subject lands and this is not contemplated through this development. Rather, the intent of this development is to implement the current policy directives contained in the Official Plan.

It should be noted (and is discussed above) that the UDB discusses the public realm as a vital component of the proposed development. The UDB makes recommendations to ensure that the proposed development will provide a functional, safe, sustainable, and attractive neighbourhood environment, well articulated streetscapes with landscaped boulevards, a network of streets that accommodate multi-modal choices for pedestrians, cyclists, and vehicles, and pedestrian linkages that connect the residential population to adjacent neighbourhoods, open space areas and commercial facilities.

- **Encourage a pedestrian-oriented streetscape along Hansen Boulevard with wide sidewalks and opportunity for patio spaces associated with abutting ground-level commercial units within adjacent mixed-use apartment buildings as described above.**

The Plan has been designed to appropriately interface with neighbouring developments and open spaces and to ensure that new built forms frame adjacent streets to provide an attractive public realm. Section 3.2.3 of the UDB provides commentary related to streetscapes. The streetscape will include elements such as boulevard trees, ornamental plantings, sidewalks, fencing and street lights. The built form adjacent to the streets will be designed to respect the character of the residential development while providing a sense of character to the community by creating visual interest and providing shade and an overall comfortable pedestrian environment. It is noted in the UDB that Architectural form and style shall complement the design of the public realm and landscaping treatments to create a vibrant public realm.

5.0 Town of Orangeville Zoning By-Law (No. 22-90) (January 31, 2015)

The Town of Orangeville Comprehensive Zoning By-Law No. 22-90 identifies zoned areas in the Town for specific land uses, and it contains specific zone permissions and provisions for each zone.

The subject lands are currently zoned “D” (Development) in the Town’s Zoning By-Law. In any Development “D” Zone, no land shall be used and no building or structure shall be erected or used except if it is deemed to exist at the time of passing of the By-law. Accordingly, an amendment to the Zoning By-Law is required to facilitate the proposed development.

An amendment to the Town’s Zoning By-Law has been applied for to facilitate the proposed Draft Plan of Subdivision. It is proposed to zone the subject lands “RM1-24.X” (Multiple Residential Medium Density - Special), “OS1” (Open Space-Recreation) and “OS2” (Open Space-Conservation). The “RM1-24.X” (Multiple Residential Medium Density - Special) zone allows for multiple dwellings (including apartment buildings) and townhouse dwellings to a maximum density of 99 units per hectare. As well, some site specific provisions have been included in the proposed zoning to facilitate the proposed development layout. Figure 4 illustrates the proposed Zoning Schedule and the draft Implementing Zoning By-Law is attached as Appendix B to this report.

The “OS1” zone permits a variety of park uses including a public park and a recreational space. The “OS2” zone permits forest management and conservation, outdoor recreational uses, and a storm water management facility. It should be noted that the limits of the “OS2” zone are proposed to accurately reflect the actual features to be preserved, including the NHS Block (Block 28) and the features within it. Accurate definition of the limits of development for this site through the expertise of environmental and engineering consultants, and with the involvement of the MNR and CVC has been completed and is reflected on the Draft Plan as limits to development.

This application to amend the Zoning By-Law is intended to facilitate development of the proposed Plan of Subdivision and to create related parkland and to preserve open space/NHS lands. The limits of the “OS2” zone and any associated environmental features have been identified through detailed field work and analysis.

6.0 CONCLUSIONS

The Orangeville Highlands Draft Plan of Subdivision and proposed Zoning By-Law Amendment applications are in conformity with the objectives and policies of the Provincial Policy Statement, the Growth Plan, the County of Dufferin Official Plan and the Town of Orangeville Official Plan. As well, as noted in the EIS&MP, the Plan design respects the CVC objectives and policies for certain natural heritage features on and abutting the site. The proposed planning approvals will facilitate development of the Draft Plan of Subdivision, involving development of 93 street townhouse units, 26 back-to-back townhouse units, 88 condominium stacked townhouse units and 334 apartment units. in accordance with the “Medium Density Residential” (Section E8.66) land use designation and policies in the Town’s Official Plan.

The subject lands are currently designated “Residential”, “Open Space Conservation”, and “Open Space Recreation” on Schedule ‘A’ (Land Use Plan) in the Orangeville Official Plan. Further, the lands designated “Residential” are further identified as “Medium Density Residential” on Schedule ‘C’ (Density Plan) and as an area subject to “Policies for Specific Areas” on Schedule ‘B’ (Policies for Specific Areas) in the Town’s Official Plan. Specifically, the special site policy for the subject lands requires the subject lands **to be developed at a minimum residential density of 75 and a maximum density of 99 units per net residential hectare.** The proposed Draft Plan of Subdivision proposes an overall density of **89.1 units per net residential ha** which is consistent with the Official Plan’s density policies for these lands.

Williams & Stewart Associates Limited / John G. Williams Limited, Architect have completed an “Urban Design Brief and Architectural Control Guidelines” (April 2019) (UDB) in conjunction with terms of reference completed and approved by the Town of Orangeville. This study uses renderings, photographs, commentary and massing plans to deliver the detailed analysis, assessment and recommendations for the proposed design and built forms within the report. The report explores built form within existing neighbourhoods in the vicinity of the subject property and refers to the broad mix of lot sizes, built forms and dwelling types that are proposed for the proposed development. It is noted that this development will create a

continuous, harmonious, safe and attractive environment through streetscape, building facade improvements and the design of new buildings. As well, the proposed development ensures that the density, form, bulk, height and spacing of development is compatible with the surrounding area.

Updates and Response Documents have been prepared as part of this resubmission to address detailed technical comments related to the natural environment, hydrogeological assessment, geotechnical assessment, water balance, meander belt assessment, traffic impact assessment, and functional servicing assessment. Specifically, Azimuth provides a detailed overview of responses to comments related to the natural environment, providing clarification on the environmentally significant features including Middle Monora Creek and a Provincially Significant Wetland on and adjacent to the site. Full consideration is given to the habitat requirements of all Species at Risk assumed and documented to occur in the area. It is confirmed that the proposed works are not expected to negatively impact the ecological functions of the Provincially Significant Wetland, Significant Woodland, Significant Valleyland, Potential Significant Wildlife Habitat and Aquatic Habitat if the appropriate mitigation measures outlined in the report are followed. Through Azimuth's thorough evaluation of the ecological function of the subject property and adjacent lands, it is concluded that the proposed development will not have any negative impacts to on site or adjacent natural features or their ecological functions

As well, Azimuth Environmental Consulting Inc. also completed a Hydrogeological Update Report (April 2019) and a Response to Comments document (April 2019) which provides additional clarification related to the hydrogeologic functions associated with the site based on the results of a sub-surface assessment and available geologic and hydrogeologic information. The Addendum report confirms the proposed development will not have a significant impact on the existing hydrogeological conditions of the area, including the adjacent wetland features associated with both the Middle and Lower Monora Creeks.

As well, Urbantech has completed an Addendum Functional Servicing Report (FSR) which responds to comments and concludes that the Orangeville Highlands Phase 2 lands can be serviced while respecting all relevant design guidelines. Specifically, the FSR concludes that the proposed SWM facility grading has been designed to provide sufficient storage for all events, that the overall earthworks strategy for this site will be to minimize earth movement and achieve a balance of cut and fill, and confirms that appropriate erosion and sediment control measures will be installed and maintained during construction and will be designed in conformance with the Town of Orangeville and CVC guidelines. As well, the FSR confirms that the sanitary sewers for the proposed development will drain to the existing 300mm diameter sanitary sewers on Hansen Boulevard and the proposed watermain infrastructure will be looped at the two access points to the site and will connect into the existing watermain on Hansen Boulevard.

A Response to Comments document for the Traffic Impact Study was completed by Paradigm Transportation Solutions (April 2019) which provides additional clarification related to technical questions provided by the Town's traffic consultant (Triton Engineering) and members of the public. The Response document reconfirms that the traffic generated by the proposed residential development can be accommodated by the boundary road system with no additional road intersection improvements; however, Paradigm reconfirms the proponents commitment to install

an unwarranted traffic control signal at the intersection of Hansen Boulevard and Victor Large Way to ensure more than acceptable intersection operations.

The proposed development is consistent with the policies of the Provincial Policy Statement regarding the provision of healthy, liveable communities developed through environmentally compatible, cost-effective land use patterns. Further, the proposed development will assist the Town of Orangeville in achieving the growth projections set out by the Province's Growth Plan and the County of Dufferin's Official Plan since the proposal is essentially implementing the vision set out in the Official Plan for the "Medium Density Residential" and Special Site Policy (Section E8.66) land use designation on the subject lands.

Through an analysis of the findings of the supporting documentation and reports, it is concluded that the development proposed through the Draft Plan of Subdivision and Zoning By-Law Amendment applications is feasible and appropriate from a planning perspective. The above noted reports provide support for the proposed subdivision since they determine that the most significant environmental areas on the property will be protected through avoidance and the development can be adequately serviced using existing municipal systems.

The proposed development will provide for desirable development in the appropriate location supported by sustainable infrastructure and no negative social or environmental impacts, and will be in conformity with the Provincial Policy Statement, the Growth Plan, the County of Dufferin Official Plan and Town of Orangeville Official Plan. As such, these applications represent good planning and should be approved.

Respectfully Submitted,

GLEN SCHNARR & ASSOCIATES INC.

A handwritten signature in black ink that reads "Karen Bennett." The signature is written in a cursive, slightly slanted style.

Karen A. Bennett, MCIP, RPP
Senior Associate

**Appendix A:
January 15, 2019 Submission to Town of Orangeville regarding Draft Master Trails Plan**



January 15, 2019

Refer To File: 1045-001

Planning, Infrastructure Services
Town of Orangeville
87 Broadway
Orangeville, ON
L9W 1K1

Attention: Brandon Ward, MCIP, RPP
Manager

**Re: Town's Proposed New Master Trails Plan
Proposed Residential Draft Plan of Subdivision
Town Files: OPZ 5/10 and S 1/10
Part of Lot 3, Concession 2, W.H.S.
Town of Orangeville, County of Dufferin**

We are the planning consultants representing Brucedale Investments Inc. and Orangeville Highlands Ltd., the owners of 17.95 ha (44.36 acres) of land located on the north side of Hansen Boulevard, just west of Highway 10 in the Town of Orangeville. The subject property is legally described as Part of Lot 3, Concession 2, WHS, Town of Orangeville. Applications for Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision were filed in 2010 and are referred to as Files OPZ 5/10 and S 1/10 at the Town of Orangeville.

As you know, the proposed development consists of a 623 unit residential Plan of Subdivision (including 93 conventional townhouse units, 26 back-to-back townhouse units, 72 stacked condominium townhouse units, and 432 apartment units divided amongst 6 buildings at 6 storeys each and two park blocks), a large (6.12 ha) natural heritage system block to be protected, an open space walkway, two park blocks consisting of 2.08 ha (5.14 ac) collectively (one park block is intended for a dog park), a stormwater management pond consisting of 1.06 ha (2.62 ac) and roads. The proposed Plan of Subdivision is to be serviced utilizing municipal services. A copy of the proposed Draft Plan of Subdivision (dated October 17, 2017) is attached to this letter for your information and for you to pass along to the Parks and Recreation Department and the consultants (Dillon Consulting), who are working with the Town on this important Trails project.



As we discussed at our meeting yesterday, we are now aware that the Town of Orangeville is working towards preparation of a new Master Trails Plan with the assistance of Dillon Consulting. We feel this presents us with a great opportunity to get involved in this process as it relates to the subject lands and to provide our preliminary comments on what we envision may be possible as it relates to trails within and around the subject lands.

We are currently in the midst of responding to various comments received from the circulation of this Plan to Town Departments and agencies. One of the comments presented by the Town of Orangeville and Credit Valley Conservation (CVC) as it related to the Environmental Impact Study (EIS) and Management Plan (MP) for Orangeville Highlands Phase 2 prepared by Azimuth in April 2018, requested the inclusion of an assessment of potential impacts related to any future trails that may traverse the property. Both Town and CVC comments indicated that future trails on the property should be depicted on the Plan. We have reviewed the Town's current draft Master Trails Plan (GSP, March 2015) and note a fairly extensive "Primary Trail System" is shown to conceptually traverse the natural heritage system block on the subject lands. The natural heritage system consists of a CVC Regulated Area that is traversed by Middle Monora Creek, a known coldwater system with Brook Trout, and a portion of the Orangeville Provincially Significant Wetland Complex. Furthermore, the woodland within this block is considered to be significant. These features are identified and discussed within the EIS and MP for the proposed subdivision in addition to the setbacks (*i.e.* buffers) that are required in order to adequately protect the identified features (See appended Figure).

We are striving to balance the interests of the Town with the ecological interests of the CVC and accordingly, we believe that minimizing the amount of trail within the natural heritage system while still providing for a functional trail linkage system within the Plan is our best strategy. A few preliminary ideas to aid in future discussions related to a future trail system for this property includes the potential for the following:

- Limiting any formal trail system to the areas outside of the identified Natural Heritage System (*i.e.* watercourse, wetland, woodland and associated buffer);
- Formalization of the existing trail from Brucedale Boulevard into the Orangeville Highlands/Brucedale Investments property, hence, allowing potential access to Monora Park in the Township of Mono to the north;



- Utilizing the proposed sidewalk network within the proposed development to connect the proposed park areas and to the existing trail network to the south of Hansen Boulevard;
- Potentially utilizing the area in the vicinity of the storm water management pond as a part of the trail system. This may include a trail along the periphery of the storm water block or within the block itself; and
- Provide a connection to a safe access point to the adjacent to the Orangeville Mall.

Obviously, consideration related to site grades and accessibility will be required for any of the abovementioned options and should be fully explored before implementation. Nonetheless, through the incorporation of some/all of the abovementioned concepts, we feel a balance can be maintained between the interests of the Town and the protection of the Natural Heritage Features.

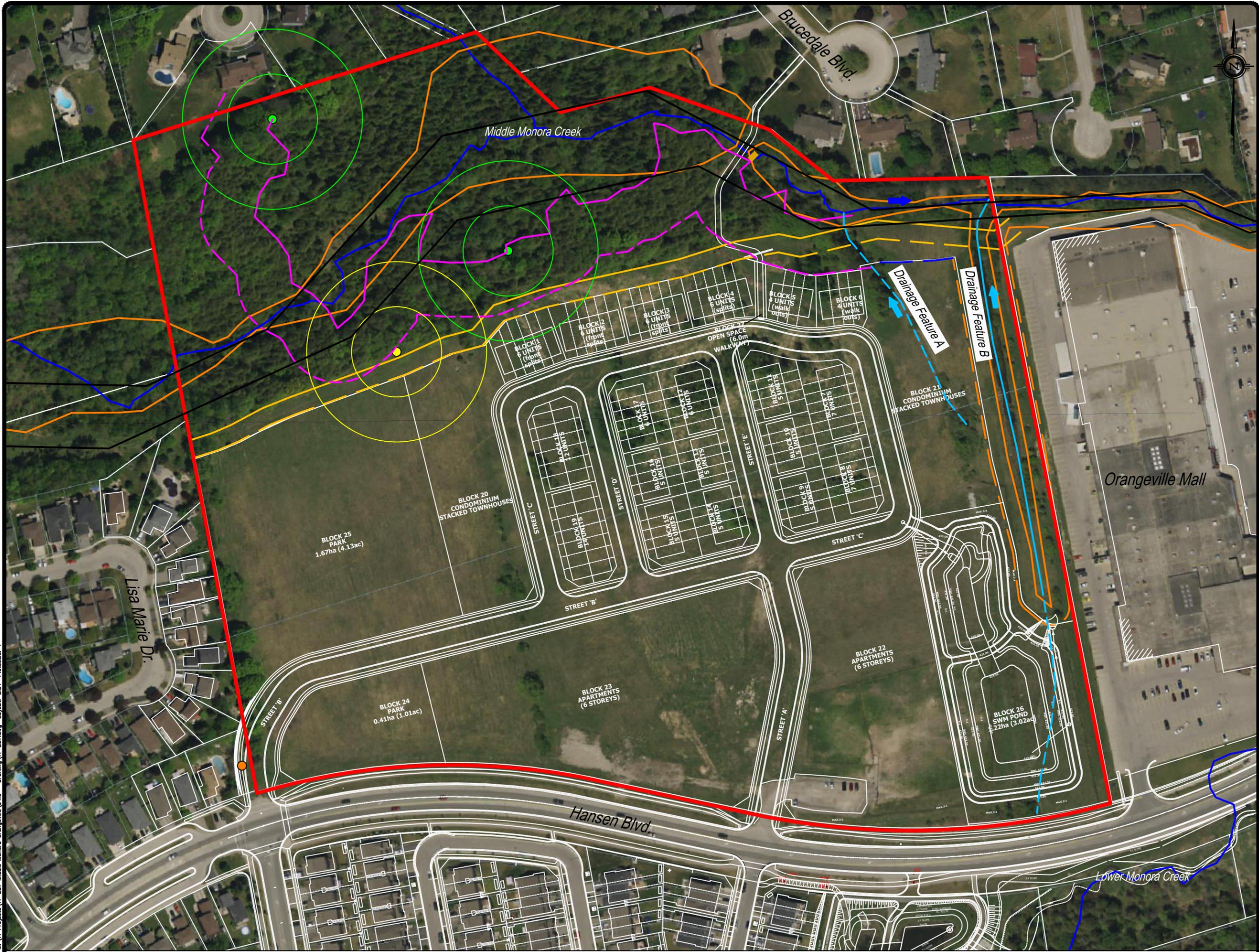
Please accept this letter submission as our comments to the preliminary new Trails Master Plan. We are most interested to be kept apprised of this process as it evolves and we would be happy to meet with the Town or their consultants (Dillon Consulting) to provide any further clarification as it relates to the proposed development and any trails proposed within it.

Yours very truly,

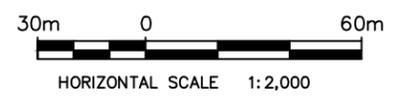
GLEN SCHNARR & ASSOCIATES INC.

Karen Bennett, MCIP, RPP
Senior Associate

Cc: Carmen N. Jandu
Jeff Colyer
L. Moran (Azimuth Consulting)



- LEGEND:**
- Approx. Property Boundary
 - Watercourse (Monora Creek)
 - - - 30m Watercourse Buffer
 - Permanent Drainage Feature
 - - - Intermittent Drainage Feature
 - ➔ Flow Direction
 - Orangeville Provincially Significant Wetland
 - - - 30m Wetland Buffer
 - Dripline
 - - - 10m Dripline Buffer
 - Flood Line (Water's Edge 2013)
 - - - 10m Floodline Buffer
 - Significant Valleyland (Meander Belt Width, Water's Edge 2013)
 - Culvert
 - Retainable Butternut Location with 25m and 50m Buffers
 - Butternut Location (Not Assessed) with 25m and 50m Buffers
 - Hybrid Butternut Location



AZIMUTH ENVIRONMENTAL CONSULTING, INC.

Proposed Development

Orangeville Highlands Phase 2
Orangeville, ON

DATE ISSUED: March 2018	Figure No.
CREATED BY: JLM	4
PROJECT NO.: 11-237	
REFERENCE: First Base Solutions	

Plotted by: MCCARTNEY on March 22, 2018 at 11:45am
 File: M:\11 Projects\11-237 Middle Monora Orangeville\04.0 - Drafting\11-237.dwg
 Layout: EISA_PlotScale_1

**Appendix B:
Draft Implementing Zoning By-Law**

THE CORPORATION OF THE TOWN OF ORANGEVILLE

BY-LAW NO. 0XX-2019

BEING A BY-LAW TO AMEND THE TOWN OF ORANGEVILLE COMPREHENSIVE ZONING BY-LAW 22-90, AS AMENDED, PURSUANT TO SECTION 34 OF THE PLANNING ACT IN RESPECT OF THE LANDS DESCRIBED AS PART OF LOT 3, CONCESSION 2, (W.H.S), ORANGEVILLE HIGHLANDS LIMITED AND BRUCEDALE INVESTMENTS INC., SCHEDULE A FILE OPZ 5/10.

WHEREAS the Council of the Corporation of the Town of Orangeville deems it appropriate to amend Comprehensive Zoning By-law 22-90, as amended;

AND WHEREAS the Town of Orangeville Official Plan provides for the lands affected by this by-law to be zoned as set forth in this by-law;

NOW THEREFORE the Council of the Corporation of the Town of Orangeville hereby enacts as follows:

1.0 THAT Schedule A to Comprehensive Zoning By-law 22-90, as amended, is hereby further amended by changing the existing Development (D) zone to Open Space Recreation (OS1) zone, Open Space Conservation (OS2) zone, and Multiple Residential Medium Density – Special Provision X (RM1-24.X) zone on the land shown on Schedule A attached hereto.

2.0 THAT Section 24 (Special Provisions) is amended by adding Section 24.X to read as follows:

Notwithstanding the provisions of Section 12(2) and 12(3), the following regulations shall apply to the lands zoned Multiple Residential Medium Density (RM1) Zone, Special Provision 24.X (RM1-24.X):

a) Maximum density for all lands zoned “RM1-24.X”: 99 units per ha

b) Regulations for *Townhouse Dwellings* - Conventional

Lot Area per unit (minimum)	150 sq.m.
Lot Frontage per unit (minimum)	5.0 m
Front Yard (minimum)	
To front of building	5.5 m
To garage	6.0 m
Rear Yard (minimum)	6.0 m
Interior Side Yard (minimum)	1.4 m (Block 5)
Exterior Side Yard (minimum)	1.2 m (Blocks 8&9)
Building Height (max)	13.0 m

c) Regulations for *Townhouse Dwellings* – Stacked

Lot Area of Block (minimum)	0.60 ha
Lot Frontage of Block (minimum)	40.0 m
Exterior Side Yard (minimum)	3.0 m
Rear Yard (minimum)	4.8 m
Building Height (maximum)	14.5 m

d) Regulations for *Townhouse Dwellings* – Back to Back

Lot Area (minimum)	100 sq.m.
Lot Frontage (min)	7.0 m
Front Yard (minimum)	5.0 m
Exterior Side Yard (minimum)	0.93 m (nw corner of block)
Rear Yard (minimum)	0.0 m
Building Height (maximum)	14.0 m

e) Regulations for other permitted Residential Uses

Exterior Side Yard (minimum)	5.0 m (to Hansen Blvd.)
Interior Side Yard (minimum)	3.0 m (to SWM pond to east)
Rear Yard (minimum)	6.0 m (to Park Block 24)
Building Height (maximum)	6 storeys or 25 m

Notwithstanding Section 5.17(7) (Parking Area Location on a Lot) uncovered surface parking area shall be permitted in a required yard.

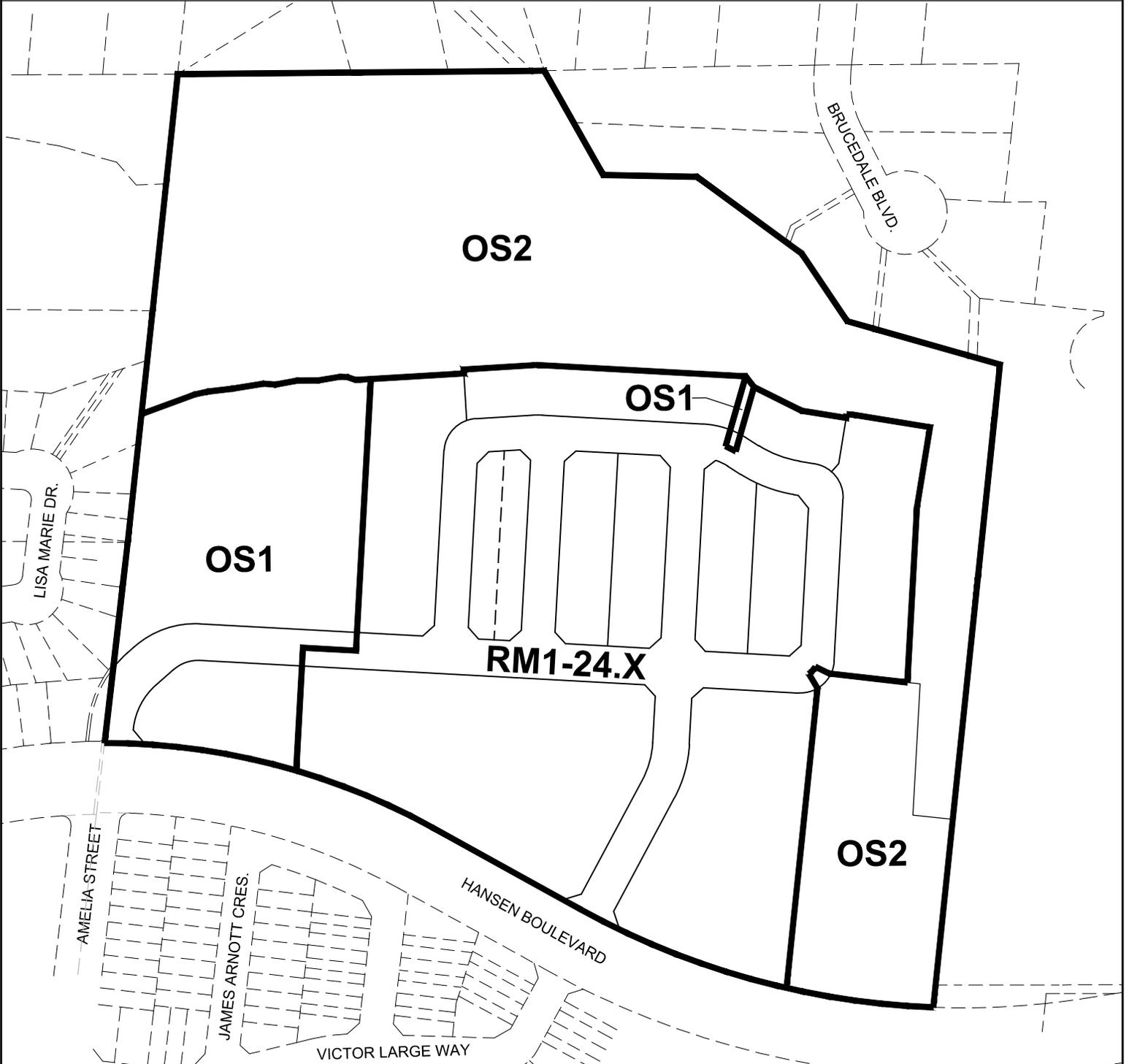
3.0 If no appeal is filed pursuant to Section 34(19) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended, or if an appeal is filed and the LPAT dismisses the appeal, this by-law shall come into force on the day of its passing. If the LPAT amends the by-law pursuant to Section 34 (26) of the *Planning Act*, as amended, the part or parts so amended come into force upon the day the LPAT's Order is issued directing the amendment or amendments.

READ A FIRST, SECOND AND THIRD TIME and FINALLY PASSED this
day of _____, 2019.

_____ Mayor

_____ Town Clerk

SCHEDULE 'A'
 TO BY-LAW No. 201□
 TOWN OF ORANGEVILLE
 PART OF LOT 3, CONCESSION 2, W.H.S.
 COUNTY OF DUFFERIN



THIS IS SCHEDULE 'A'
 TO BY-LAW No. □□□□□□□□, 201□

REZONED FROM 'D' - DEVELOPMENT ZONE TO:

- 'RM1-24.X' - RESIDENTIAL MULTIPLE RESIDENTIAL MEDIUM DENSITY EXCEPTION ZONE
- 'OS1' - OPEN SPACE - RECREATIONAL ZONE
- 'OS2' - OPEN SPACE - CONSERVATION ZONE

 MAYOR

 CLERK



SCALE 1:3000
 APRIL 12, 201□