

Official Plan Amendment Policy Comment/Response Matrix

	Commenter	Policy Number	Policy Excerpt	Request	Response
1	MGP/LOG	12.4.11 ii) Old Elm Major Transit Station Area	<i>This Plan implements the Major Transit Station Area, as delineated by York Region, within an approximate 500 metre radius (approximately 5-minute walk) of the Old Elm GO Station as shown on Schedule F5...</i>	We request that the eastern MTSA boundary be straightened to create a boundary that does not prejudice land use or EA requirements. A standard setback from 10th Line of 160m is suggested. In addition, major undevelopable lands should be excluded on the west side of the MTSA.	The MTSA boundary cannot be adjusted. The MTSA has been determined and refined throughout this process in conjunction with the land use and servicing review. In part it is designed to encapsulate an approx. 500 m radius around the station. Limiting the MTSA as suggested would not meet the intent of Provincial policy as it would fall greatly short of a 500 m radius. There is flexibility in the policies to allow the collector to be slightly modified through the EA process. The transportation consulting team verified that the collector road is well grounded and should not need to shift substantially. Further, note the MTSA has been adopted by Regional council via the York OP adoption. Lands on the west side of the rail line are not proposed to be incorporated into the MTSA.
2	MGP/LOG	12.7.23.1 Old Elm Major Transit Station Area	<i>The boundaries of the land use designations on Schedule F5 are approximate and subject to minor refinements without amendment to this Plan. Where boundaries are shown as following the roads, the location of the roads may be subject to minor changes through more detailed</i>	The MTSA boundary should not be tied to the collector road, as an OPA will be required to adjust the land use designations should the EA require a different road location than illustrated by Schedule F5.	See above.

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			<i>review of development applications, in accordance with this Plan. As such, the boundaries of the land use designations will be adjusted accordingly without requiring an amendment to this Plan, provided the changes are minor...</i>		
3	MGP/LOG	12.8.5.2 Lincolnvile Transportation and Streetscape *	<i>The collector road network will be designed in accordance with the road network concept illustrated on Schedule F5. The specific alignment and location of collector roads is subject to further refinement through the development application process, and any minor refinements will not require an amendment to this Plan...The specific design, alignment and need for collector and local roads will occur through the development review process and may be subject to an appropriate process in accordance with the Environmental Assessment Act, such as the Municipal Engineers</i>	The EA should be part of the Secondary Plan process, but given that it is not, we request: 1. Text clarifying that an OPA will not be required to adjust the location of the collector road locations should they based on the EA should also be added. 2. Furthermore, we don't believe that the east-west collector requires an EA on the west side of 10th Line. Schedule F5 be updated to reflect the collector road connection to the existing community.	The text already indicates that an OPA is not required for minor modifications, but minor adjustments have been made for clarity. Collector road on the west side of Tenth Line has been corrected.

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			<i>Association's Municipal Class Environmental Assessment process...</i>		
4	MGP/LOG	12.8.5.2 v) Old Elm Transportation and Streetscape	<i>Direct connections from private or condominium road/lanes to collector roads will only be permitted for shared access to a condominium block or to parking</i> <i>access for larger sites. Multiple individual connections from private roads or lanes shall be predominantly accessed from local roads.</i>	Given the density of this community, there will be few (if any) public local roads and condominiums will need to access the collector roads. We request that the Town provide clarity on the private road connections.	The policy helps to minimize collector road entrances. Added a minor modification to address the comment – see 12.8.5.2 v.
5	MGP/LOG	12.8.5.2 xii) Old Elm Transportation and Streetscape	<i>The Town will require the urbanization of the Tenth Line and Bethesda Road within the Old Elm Go Station Area. The ultimate right-of-way width, design and the construction of urbanized roads will be refined through the development application review process (including the Plan of Subdivision process), a Municipal</i>	The OPA should state the ultimate right-of-way width and required road widening. We understand that the ultimate ROW for Bethesda Road is 27m and 10th Line is 33m based on the Urban Design Guidelines. We request that clarification be added that the right-of-way width must be in line with the width required in the Parent Official Plan. Note: the current width varies and generally meets or exceeds the required width in the Official Plan and Transportation Master Plan. Intersection widenings required for development do not typically require an EA.	RoW widths are addressed through supporting documents.

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			<i>Class Environmental Assessment, as required or other implementation mechanisms at the discretion of the Town.</i>		
6	MGP/LOG	12.11.2.9 Inclusionary Zoning	<i>The Town will consider initiating an inclusionary zoning study, in accordance with Section 16(5) of the Planning Act, to evaluate the appropriateness of utilizing inclusionary zoning to support the creation of affordable housing units in the Major Transit Station Area.</i>	We request further clarity on how inclusionary zoning would apply to the MTSA.	There are no implications at this time, as the OPA is indicating the potential for a study to be completed. The study would identify any further policies. An assessment report and other requirements must be met before implementing inclusionary zoning policies.
7	MGP/LOG	12.11.13 iv) Implementation of the Old Elm Policies	<i>The Town will consider initiating a study in the Old Elm area to assess the appropriateness and suitability for a Community Improvement Plan to support the principles and policies of this Plan and to complement the Urban Design Guidelines and other implementation tools. This Community Improvement Plan Study may include:</i> <i>...c. Establishing incentives or otherwise utilizing the powers under Part IV of the Planning Act...</i>	We request further clarity on the incentives that may be included in the Community Improvement Plan. Why is there a need for a Community Improvement Plan for a community that hasn't been built yet?	These policies are enabling and do not have effect. If the Town is interested, then a study would be initiated.

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8	MGP/LOG	Schedule F5	N/A	We request a: 1. Revision to the MTSA boundary to eliminate open space on the west of 10th Line; 2. Revision to regularize the eastern MTSA boundary; 3. Relocate north-south collector road east of 10th Line; and, 4. Revision to collector road on the Newstone plan.	The MTSA should not be delineated to cut out all open space but maintain a fairly contiguous area, per Regional direction. Refer to previous comments regarding roads and MTSA delineation. Several factors were considered when determining the appropriate location of the road: i) The Town will require a robust/reliable transit route ii) The two access points at Bethesda and proposed Keeler Ave. (Courtney Valley future plan) need to be connected. The collector road as it enters the Courtney Valley Subdivision to the South will have a reduced cross section making it 20/21m local road because of the existing OMB(OLT) draft approved plan. iii) Density in the area will require a collector level RoW. The identified 23m RoW meets Town objectives for this purpose, while also incorporating all of the necessary elements for a collector road.

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					iv) The road is intended to provide relief for potential congestion on Tenth Line and to help with the Town's Vision Zero plan: a) Tenth Line will mainly provide the connection to the Old Elm Go station, capacity for through traffic, and curbside space for the future retail on Tenth Line. b) The continuous collector road will serve as a bypass to the busy segment on Tenth Line, provide direct and safe access to the new neighborhood. c) Tenth Line and the collector road's separate functions and serving different trips will reduce potential conflicts in the MTSA and help with the Town's Vision Zero plan. v) Maintaining the proposed 23m right-of-way will allow the Town to also protect for future needs for a variety of mobility needs. vi) The final location and alignment of the road will be subject to engineering analysis conducted through the development application process and may be permitted to deviate slightly without requiring an amendment to the Official Plan.

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9	MGP/LOG	Density Definitions	n/a	In addition to the requested modification to policies outlined above, we ask that staff provide clear direction in the Secondary Plan (draft OPA) on Net versus Gross Density.	The revised OPA includes a definition for clarity. There is an approximate 15% difference between gross and net densities which corresponds to the exclusions in net density versus gross density (parks, open space and schools).
10	MGP/LOG	12.7.23.3 ii) Old Elm Major Transit Station Area	<i>...Further, density is intended to be concentrated in close proximity to the GO Station itself, at the intersection of Tenth Line and the new east-west collector road, and along Tenth Line adjacent to this intersection, that will represent the community focal point...</i>	While the phrase "Main Street" was removed as requested, we continue to request that the phrase "community focal point" be removed as well. Adjustment to Schedule F5 to reflect text.	It is still important to retain the concept of a community focal point as a key design and land use feature of this plan.
11	MGP/LOG	12.7.24.2 Old Elm High-Density Mixed-Use*	<i>...In all other portions of the Old Elm High-Density Mixed-Use designation, a convertible building frontage (i.e., minimum ground floor height of 4.5 metres) will be required along Tenth line and the east-west collector road in order to permit a future potential conversion to commercial uses. Lower ground floor heights will be considered where it can</i>	We request that the reference to a minimum ground floor height of 4.5 metres be limited to along 10th Line at the Metrolinx intersection where retail is required and encouraged along the east-west collector road.	The intent of the Plan is to facilitate flexibility for new commercial uses to establish after development has occurred. The minimum ground floor height is a key policy to support this principle.

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			<i>be demonstrated that they would accommodate conversion to commercial uses.</i>		
12	MGP/LOG	12.7.24.3 viii) Old Elm High-Density Mixed-Use	<i>Development will be planned to achieve a net density of at least 115 units per net hectare, up to approximately 170 units per net hectare (about 100 to 150 units per gross hectare). It is the intent of this designation to significantly exceed the overall planned minimum gross density target of 150 people and jobs per hectare for the Major Transit Station Area.</i>	We request a gross density range of 180-450 uph.	Based on the input we received, the maximum density policies have been updated to ensure they are in alignment with the intended built form. For further flexibility, we included a new policy containing criteria in which the Town can review applications that exceed the maximum density noted in the designation. It is not the intent of the Town to cap density unreasonably, but to ensure the built form vision is achieved while providing services. Note that the maximum density policies were mainly inserted to give certainty with respect to servicing and transportation and are intended to have a secondary bearing on built form. Built form is guided mainly by the height and design policies and the UDGs.
13		12.7.25.2 Old Elm Medium-High Density Mixed-use*	<i>Permitted uses are: ...iv) Stacked townhouses and back-to-back stacked townhouses...</i>	We request the Town permit a full range of townhouse forms (street, laneway, and back-to-back townhouses) be permitted, with a restriction that these townhouse type will not be located on lands not directly fronting onto Tenth Line.	Policies and criteria have been adjusted to permit a broader range of townhouses in this designation, subject to criteria.
14	MGP/LOG	12.7.25.3 iv) Old Elm Medium-High Density Mixed-use	<i>Development will be planned to achieve a net density of at least 80 units per net hectare, up to approximately 140 units per net hectare (about 70</i>	We request a gross density range of 60-400 uph.	See above with respect to the proposed maximum. For the minimum, note there was a typo (the net and gross minimums were swapped) and the new minimum gross is 80. This density range was generally intended

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			<i>to 125 units per gross hectare). It is the intent of this designation to at least meet, and preferably exceed, the planned minimum density target of 150 people and jobs per hectare for the Major Transit Station Area.</i>		to achieve the overall minimum density target of 150 ppj/ha in the MTSA and thus, in this designation, represent a medium amount of density compared to other areas in the MTSA. The designation is intended to facilitate density and built form transition from the periphery of the MTSA to the densest component, the High Density Mixed Use designation.
15	MGP/LOG	12.7.26.3 iii) Old Elm Medium-High Density Residential Designation	<i>Development will be planned to achieve a net density of at least 65 units per net hectare, up to approximately 115 units per net hectare (about 55 to 100 units per gross hectare). It is the intent of this designation to generally meet the planned minimum density target of 150 people and jobs per hectare for the Major Transit Station Area, recognizing that there may be variation between each individual development application.</i>	We request a gross density range of 45-120 uph.	This was a minor request that facilitates more flexibility in the policy without significantly affecting the vision, so the modification has been made.
16	MGP/LOG	12.7.27.2.1 Old Elm Residential Designation	<i>Permitted uses are: i) A limited number of smaller lot single and semi-detached dwellings; ii) A full range of townhouses, including</i>	This policy is vague, and it is unclear how many lots constitutes “a limited number of” which can pose significant challenges for implementation. We request that the words “a limited number of” be removed from this policy because a limited number is all that will be possible with singles given the minimum density of 35 uph.	Reference to “limited number” has been removed and replaced with a new policy to address that the Town will allow singles/semis as long as the minimum density in the designation is not compromised.

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			<i>street townhouses, back-to-back townhouses, laneway townhouses and stacked townhouses...</i>	Stateview is proposing a hybrid townhouse form and would like clarity on how it would be categorized to ensure that it is permitted.	The policy states a 'full range of townhouses' is permitted, so another townhouse typology could be defined in the zoning when the Town implements the policies.
17	MGP/LOG	12.7.29 ii) Old Elm Special Provision 1	<i>The Town will require the completion of a noise study to assess impacts from the layover facility on future development as well as Bethesda Road within the conceptually shown Special Provision 1 area...</i>	We request that this policy be removed as noise studies are typically already required for development and therefore, the requirement is redundant.	This policy offers clarity around the Town's intentions for the lands on the south side of Bethesda.
18	MGP/LOG	12.6.5 i) Old Elm Stormwater Management Policies	<i>The Town may require or undertake the completion of an updated Stormwater Management Concept Plan or similar master plan or study, providing a coordinated strategy for stormwater management in Lincolnvile, prior to approval of any development application in Lincolnvile.</i>	Stormwater management should be handled independently on the east and west sides of Tenth Line and on the west side of the GO Rail Corridor. This policy should be modified to allow for a coordinated stormwater management plan to be provided for three discrete areas within the plan boundary: 1. Lands west of the GO Rail Corridor 2. Lands west of Tenth Line and east of the GO Rail Corridor 3. Lands east of Tenth Line	Examining the areas as a whole allows the Town to ensure the most efficient servicing solution is selected (e.g., it may be appropriate to aggregate the SWM features at reduced maintenance cost compared to managing multiple). It is the Town's preference to require a coordinated strategy as is best practice and encouraged by Provincial policy with respect to finding efficient servicing solutions.

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19	MGP/LOG	12.6.5 iii) Old Elm Stormwater Management Policies	<i>The provision of stormwater management facilities will be coordinated and be considerate of adjacent development and the broader Lincolnville community. Prior to approving an individual development application, the Town may require a coordinated Stormwater Management Plan to be prepared broadly for the Lincolnville community, in order to set out guiding principles and a conceptual stormwater arrangement plan.</i>	This policy is made redundant by 12.6.5 i). The Town should eliminate this policy and make the necessary refinements to 12.6.5 i) to recognize and enable independent stormwater management solutions for the three discrete areas described above.	The redundancy has been removed and the policies have been merged.
20	MGP/LOG	12.6.5 vi) Old Elm Stormwater Management Policies	<i>Stormwater management facilities that are comprised of dual uses shall be considered in the context of the Major Transit Station Area in order to achieve the objective of efficient use of land and to provide additional amenity space. Where proposed, they shall meet with the requirements of the Town, however, they may not be accepted as a contribution to parkland dedication.</i>	Dual use facilities should be encouraged throughout the Secondary Plan area, rather than just considered in the MTSA. It is unclear if the Town is intending to preclude the possibility of crediting all or a portion of these facilities as parkland dedication. We request the last sentence be re-worded: "...they may be accepted by the municipality as a contribution to parkland dedication". The Town should consider these spaces as eligible for parkland contribution credit.	The Town prefers to accept unencumbered parks facilities from a maintenance and efficiency perspective. This also allows for fully programmable parkland. The policy allows for some discretion by the Town to ensure parkland meets the needs of the community.

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21	MGP/LOG	12.7.23.5 i) Old Elm Open Space, Parks	<i>...In addition, parkettes or urban squares are also encouraged throughout the Lincolnville area as appropriate to the development and to create a range of park spaces in Lincolnville...</i>	We expect that the parkettes identified on the concept plan will be owned and maintained by the Town with credit for parkland dedication.	No change necessary as this is not addressed through the Official Plan.
22	MGP/LOG	12.7.24.3 Old Elm High-Density Mixed-Use	<i>...To support this vision, the Town will encourage the provision of privately-owned public spaces (POPS) or urban squares as part of development...</i>	We expect that POPS will receive parkland credit provided that there is an agreement in place to provide public access.	No change necessary as this is not addressed through the Official Plan.
23	MGP/LOG	Schedule F5	<i>Parks</i>	Only 2 neighbourhood parks are identified on the Land Use Plan, while previous correspondence from the Town identified a need for 3 parks, at a minimum of 1.6 ha each, for a total of 6 ha of parkland dedication. We request clarification on the number and size of required parks.	Two neighbourhood parks are required, one on each side of Tenth Line. A neighbourhood park as defined in the Leisure & Community Services Master Plan as a minimum of 2 ha.
24	MGP/LOG	12.7.24.3 ii) Old Elm High-Density Mixed-Use	<i>Schedule F5 identifies a Required Mixed-Use Frontage Area in the vicinity of Tenth Line and the new east-west collector road within the Old Elm High-Density Mixed-Use designation. Within this generally defined area, at-grade commercial uses, as permitted by section 23.2.</i>	We request that commercial uses be permitted in all buildings adjacent to 10th Line and only required at the Metrolinx intersection. This should provide commercial floor space in line with the Town's target and Urban Metrics' Assessment of the need for 40,000 to 50,000 square feet of commercial use. Rotate or reduce Required Mixed-Use Frontage Area oval on Schedule F5.	The concept is to concentrate mixed use at the collector/Tenth Line intersection east of the station, creating a community node/focal point along the Collector Road. Along Tenth Line, min ground floor requirements are applied to allow conversion to commercial in the future. Commercial uses are permitted along Tenth Line per the applicable land use designations.

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			iii) above, will be required within the ground floor building frontage for any buildings fronting onto Tenth Line or its intersection with the new east-west collector road within the Old Elm High-Density Mixed-Use designation.		A second commercial node is located at the southern end of the high density mixed use designation.
25	SVN/Newstone	12.4.11.1.3 Lincolnvile Vision and Structure	<i>...The policies of this Plan enable a degree of flexibility with respect to unit types and development pattern, however, the demonstration plan is conceptual in nature and variations that meet the policies and objectives of this Plan will be considered by the Town.</i>	No demonstration plan is provided in the Lincolnvile Urban Design guidelines, Land Use Study, or OPA. It is unclear, therefore, what demonstration plan this policy refers to. The policy should be revised for clarity.	Addressed, we modified reference to the Demonstration Plan to refer to the land use plan.
26	SVN/Newstone	12.4.11.5 Lincolnvile Transportation and Streetscape Policies	<i>The collector road network will be designed in accordance with the road network concept illustrated on Schedule F5 to this Amendment. The specific alignment and location of</i>	The collector road alignment on the west side of Tenth Line in schedule F5 does not align with the road alignment that has been discussed and generally agreed to with City staff (see enclosed correspondence with Burnside/Town, dated May 3). Although we're working to confirm some final details of this alignment (e.g. lot depth for detached housing) we request the schedule be updated to reflect the proposed conceptual	This has been adjusted and is now shown in the schedule.

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			<i>collector roads is subject to further refinement through the development application process, and any minor refinements will not require an amendment to this Plan.</i>	alignment as it is a more accurate representation of the final configuration of collector roads than the current schedule (see enclosed drawing '220318_42036_OVERALL ROAD NETWORK CONCEPT WEST OF TENTH LINE'). Moreover, the current schedule indicates the connection of a collector road to a local road in an existing subdivision whereas the proposed conceptual alignment connects the new collector road to an existing collector road at Forsyth Farm Drive.	
27	SVN/Newstone	12.4.11.6.3 Lincolnvile Open Space, Parks and Stormwater Management Policies	<i>3. The Town will require the completion of an updated Stormwater Management Concept Plan or similar master plan or study, providing a coordinated strategy for stormwater management in Lincolnvile, prior to approval of any development application in Lincolnvile.</i>	Stormwater management should be handled independently on the east and west sides of Tenth Line and on the west side of the GO Rail Corridor and there is no reason to encumber or delay the development of any of the three parcels to achieve an over-arching stormwater management concept. This policy should be modified to allow for a coordinated stormwater management plan to be provided for three discrete areas within the plan boundary: 1. Lands west of the GO Rail Corridor. 2. Lands east of the GO Rail Corridor and west of Tenth Line. 3. Lands east of Tenth Line.	Refer to response above.
28	SVN/Newstone	12.4.11.6.6	<i>6. The provision of stormwater management facilities will be coordinated and be considerate of adjacent development and the broader Lincolnvile community. Prior to approving an individual development application, the Town may require a coordinated Stormwater Management Plan to be prepared broadly for the Lincolnvile community, in</i>	This policy is made redundant by 12.4.11.6.3. The Town should eliminate this policy and make the necessary refinements to 12.4.11.6.3 to recognize and enable independent stormwater management solutions for the three discrete areas described above.	Removed per prior responses.

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			<i>order to set out guiding principles and a conceptual stormwater arrangement plan.</i>		
29	SVN/Newstone	12.4.11.6.9	<i>9. Stormwater management facilities that are comprised of dual uses shall be considered in the context of the Major Transit Station Area in order to achieve the objective of efficient use of land and to provide additional amenity space. Where proposed, they shall meet with the requirements of the Town, however, they may not be accepted as a contribution to parkland dedication.</i>	The Town should continue to consider these spaces as eligible for some parkland contribution credit. Doing so will help to offset the additional cost of the facilities and ultimately yield more usable space for public recreation. It is unclear if the Town is intending to preclude the possibility of crediting all or a portion of these facilities as parkland dedication. We request the last sentence be re-worded: "...they may or may not be accepted as a contribution to parkland dedication."	See previous.
30	SVN/Newstone	12.7.22.3. Lincolnvile High-Density Mixed-use Designation	Section Numbering	The section numbering is inconsistent with the preceding and following sections. Town to revise.	Section numbering has been corrected.
31	SVN/Newstone	12.7.22.3.3.3.8	<i>8. Development will be planned to achieve a net density of at least 115 units per net hectare, up to approximately 170 units per net hectare (about 100 to 150 units per gross hectare). It is the intent of this</i>	Setting upper limits for the High-Density Mixed-Use designation run counter to its stated objective to "significantly exceed" the minimum density within the MTSA. As per Newstone's current proposal for its east parcel, which has been reviewed and discussed several times with staff, its proposed density of approximately 310 upnh exceeds the upper range proposed in the policy of 170 upnh despite its built form being in conformity with all other aspects of the	Refer to previous comments regarding maximum density.

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			<i>designation to significantly exceed the overall planned minimum gross density target of 150 people and jobs per hectare for the Major Transit Station Area.</i>	proposed OPA. It is, for instance, compact and generally limited to 8 storeys except for a 12-storey tower form closest to the GO Station. This illustrates the incongruity and challenges with including density maximums that can have the unintended consequence of restricting development despite the proposal conforming to all other policies. We request, therefore, that the Town remove the upper range from this policy or, at a minimum, increase it to 450 uph (gross).	
32	SVN/Newstone	12.7.22.4.4.2.1 Medium-High Density Mixed-use Policies	Permitted uses	We request the Town also add back-to-back townhouses as a permitted use given that it is a medium-high density form and by including it will allow for a greater mix of housing types within the plan area.	Policies have been modified to allow back to back and street townhouses provided they do not front directly onto Tenth Line.
33	SVN/Newstone	12.7.22.4.4.3.4	<i>4. Development will be planned to achieve a net density of at least 80 units per net hectare, up to approximately 140 units per net hectare (about 70 to 125 units per gross hectare). It is the intent of this designation to at least meet, and preferably exceed, the planned minimum density target of 150 people and jobs per hectare for the Major Transit Station Area.</i>	We reiterate that, as with policy 12.7.22.3.3.3, setting upper density limits for this land use contradicts the intent to preferably exceed the minimum permitted densities and in fact conflicts with other policies concerning building heights and encouraging a compact built form. We request that the Town remove the upper range from this policy or, at a minimum, increase it to 380 uph (gross).	Refer to previous comments regarding maximum density.

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34	SVN/Newstone	12.7.22.4.4.3.6	<i>6. The Tenth Line intersection with the new southern east-west collector located within the Lincolnville Medium-High Density Mixed-Use designation and further south from Old Elm GO Station, is envisioned to provide another mixed-use focus for Lincolnville that complements the more northerly, and significant node at the intersection with the Old Elm GO Station and east-west collector as indicated in section 12.7.23.3.3.9. This intersection is envisioned to also provide an opportunity commercial at-grade uses, provide for a generous pedestrian realm, providing opportunity for public outdoor activities such as outdoor patios, seating, landscaping features, and public art. To support this vision, the Town will encourage the provision of privately-owned</i>	This is a new policy direction from the Town and was not included in the previous public consultation draft, which has consistently affirmed the Town's desire to orient mixed-use and commercial development to the eastwest collector road connecting to the GO Station. We are concerned that this policy contradicts the vision for the Lincolnville area to not be a significant commercial destination within the Town. Moreover, the Commercial Needs Assessment prepared by Urban Metrics for the Town (August 26, 2019) indicates market support for 39,900 s.f. – 50,300 s.f. of commercial space, which should be concentrated to one or two nodes. Given the uncertainty of commercial demand, we request the Town focus commercial uses to one node (the eastwest collector road opposite the GO Station) to encourage the success of businesses located there. If warranted in the future, the Plan could be amended by the Town to create an additional node.	A small commercial mixed use frontage area has been identified at the southerly end of the high-density mixed-use designation. In other areas, commercial uses are permitted and will be facilitated by requiring minimum ground floor heights, allowing for future conversion.

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			<i>public spaces (POPS) or urban squares as part of development, in accordance with the applicable Lincolnville Urban Design Guidelines.</i>		
35	SVN/Newstone	12.7.22.5.5.3.3 Lincolnville Medium- High Density Residential Designation	<i>3. Development will be planned to achieve a net density of at least 65 units per net hectare, up to approximately 115 units per net hectare (about 55 to 100 units per gross hectare). It is the intent of this designation to generally meet the planned minimum density target of 150 people and jobs per hectare for the Major Transit Station Area, recognizing that there may be variation between each individual development application.</i>	We reiterate that, as with policy 12.7.22.3.3.3 and 12.7.22.4.4.3.4, setting upper density limits for this land use contradicts other policies concerning building heights and encouraging a compact built form. We request that the Town remove the upper range from this policy or, at a minimum, increase it to 120 uph (gross).	Refer to previous density related comments.
36	SVN/Newstone	12.7.22.6.6.2.1.a Lincolnville Residential Designation	<i>1. Permitted uses will include: a. A limited number of smaller lot single and semi-detached dwellings;</i>	This policy is vague and it is unclear how many lots constitutes “a limited number of” . This not only does this pose significant challenges for implementation, but it ignores the broader policy objective of ensuring that minimum densities are achieved while ensuring an appropriate mix and range of housing options. We request that the words “a limited number of” be	Revisions have been made to remove the “limited number” and added a policy to address what this means more specifically.

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				removed from this policy. Alternatively, we suggest including the following language: Permitted uses will include: a. smaller lot single and semi-detached dwellings where it can be demonstrated that a planning application will not have a negative impact on minimum density targets within the application area.	
52	Bousfields Inc.			Land Use and Density Based on the analysis from more detailed engineering work completed by Acorn and Northcape's engineers, we have prepared an alternative land use plan (Preferred Option) to the Town's plan for the subject sites (see Attachment 1 for Concept Plan/Preferred Option and Images 1 and 2 below showing alternative land use plan schedule). The alternative land use plan is not that different from the Town's plan but redeploys density to provide an appropriate transition from higher to lower densities, while still achieving minimum density requirements. In this regard, the alternative land use plan maintains and supports the Town's overall vision and goals for the Old Elm lands, including much-needed traffic calming measures, the concentration of higher densities and mixed uses in proximity to the GO Station and along Tenth Line and provides an appropriate transition of decreasing density to the east from the centrally located High-Density Mixed-Use Area (Draft Policy 12.4.11.iii) along Tenth Line. As stated, the Preferred Option continues to achieve or exceed the overall minimum MTSA density of 150 people and jobs per hectare in support of Draft Policy 12.7.23.2.i and the policy direction in the Growth Plan. Focusing the highest density along Tenth Line and increasing the maximum permitted density in these areas will provide better opportunities to achieve the Town's desired vision for Tenth Line as a mid-rise, mixeduse, walkable corridor. There is no need to provide the depth of the land uses that are shown in the Town's draft land use plan and providing a north-south road (as discussed in more detail below) between the highest density area	Refer to previous comments regarding maximum density. Regarding the depth of highest density designation, given that the proposed OPA maintains the North-South Collector road along the eastern edge of the MTSA, it is necessary to demonstrate the depth of the highest density designation.

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				and the medium high density area creates an appropriate transition of scale. Therefore, the alternative land use plan and Preferred Option will provide a better configuration for this new part of the Town including a complete and connected transit-supportive community.	
	Bousfields Inc.			Location of North-South Collector Road We continue to believe that there is a more appropriate location of the north-south collector road than what is shown on the Town's plan. The location of the north-south collector road that is currently shown on Schedule C to the draft Official Plan Amendment (DS-018-22 Attachment 3), based on the more detailed information and analysis from the LOG engineering consultants, will require deep sewers and extensive filling to accommodate the servicing of the lands which will result in inefficient patterns of development and undesirable grading for the proposed residential land uses. Shifting this collector road further west would mean less extensive grading works, would allow standard depth sewers and create more efficiencies. A more efficient pattern of development and increasing the maximum permitted density ranges (discussed below) aligns with Provincial policy by prioritizing intensification and more compact built form while also providing for a diverse mix of built forms and housing options in the remainder of the MTSA. As discussed above, in terms of land use planning, shifting the north-south collector to the west also allows for the creation of a logical boundary and more appropriate transition between the proposed <i>High Density Mixed Use</i> and <i>Medium-High Density Mixed Use</i> land uses along Tenth Line (i.e., apartments, mixed-use buildings, and stacked apartments) and the less intensive land uses to the east.	Several factors were considered when determining the appropriate location of the road: i) The Town will require a robust/reliable transit route ii) The two access points at Bethesda and proposed Keeler Ave. (Courtney Valley future plan) need to be connected. The collector road as it enters the Courtney Valley Subdivision to the South will have a reduced cross section making it 20/21m local road because of the existing OMB(OLT) draft approved plan. iii) Density in the area will require a collector level RoW. The identified 23m RoW meets Town objectives for this purpose, while also incorporating all of the necessary elements for a collector road. iv) The road is intended to provide relief for potential congestion

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					on Tenth Line and to help with the Town's Vision Zero plan: a) Tenth Line will mainly provide the connection to the Old Elm Go station, capacity for through traffic, and curbside space for the future retail on Tenth Line. b) The continuous collector road will serve as a bypass to the busy segment on Tenth Line, provide direct and safe access to the new neighborhood. c) Tenth Line and the collector road's separate functions and serving different trips will reduce potential conflicts in the MTSA and help with the Town's Vision Zero plan. v) Maintaining the proposed 23m right-of-way will allow the Town to also protect for future needs for a variety of mobility needs. vi) The final location and alignment of the road will be subject to engineering analysis conducted through the development application process and may be permitted to deviate slightly without requiring an amendment to the Official Plan.
	Bousfields Inc.			Proposed Densities and Additional Permitted Built Form Types Based on the preparation of more detailed concept plans for the subject sites, including application and	See comments above regarding changes to density ranges.

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				analysis of the Town's proposed density ranges, we are concerned that the proposed density and built form types do not actually allow for the implementation of the Town's vision. We have provided this comment through the LOG's ongoing engagement in the review of the Town's documents. Therefore we continue to request that the following modifications be made to the proposed density ranges. This is of particular importance for the the <i>High-Density Mixed Use</i> and <i>Medium-High Density Mixed Use</i> designations. The ranges that we are requesting for these designations are proposed are based on the application of the minimum and maximum building heights for the buildings along Tenth Line (min. 5 storeys/max. 12 storeys for the <i>High-Density Mixed Use</i> designation and min. 4 storeys/max. 10 storeys for the <i>Medium-High Density Mixed Use</i> designation) that the Town has proposed: Request changes based on concept plan: High-Density Mixed Use 100-150 uph to 180-450 uph Medium-High Density Mixed Use 70-125 uph to 60-180 uph Medium-High Density Residential 55-100 uph to 45-100 uph Without these changes, the Town's proposed built form types will not be achieved as drafted. In addition, we request that the list of permitted uses in Draft Policy 12.7.25.2 for the <i>Medium-High Density Mixed Use</i> include a full range of townhouse forms (street, laneway, and back-to-back townhouses), with a restriction that these townhouse type will not located on	

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				lands not directly fronting onto Tenth Line. Through the policy framework, Tenth Line is envisioned with a minimum building height of 4 storeys Provided that the mid-rise built form is achieved along Tenth Line, it is appropriate to provide additional flexibility be added by permitting the full range of townhouse forms with a minimum of 3 storeys within the interior of this designation. This allows for an appropriate transition with flexibility in form while still achieving and exceeding the overall minimum density of 150 people and jobs per hectare. The desired built form along Tenth Line, with a more diverse mix of built forms and housing options throughout this designation is supportive of provincial policies and plans.	
	Bousfields Inc.			In addition to the requested modification to policies outlined above, we ask that staff provide clear direction in the Secondary Plan (draft OPA) on Net versus Gross Density. The policies for each land use designation in the Draft OPA specify permitted net density ranges and gross density ranges. Both the in-effect Official Plan and the ineffect Community of Stouffville Secondary Plan (December 2020 consolidated) define Gross and Net Density. Based on these definitions and as it applies to the draft policies, Net Density includes the lot and local/collector roads but excludes schools, institutional uses, parks and open spaces. Given that within the Lincolnville (Old Elm) GO MTSA area there are no large parks, schools, or open spaces, the difference between net and gross density is negligible. The draft policies include a substantial difference in gross and net density ranges (i.e., The density ranges for the <i>High-Density Mixed Use</i> designation is 115-170 units per net hectare or 100-150 units per gross hectare) and we request that staff clarify the reasoning behind these different density range, particularly within the MTSA boundary.	See comments above regarding net and gross density definitions.

Urban Design Guidelines Comment/Response Matrix

Commenter	Section	Policy Excerpt	Request	Response
Land Owners Group	Section 2.2 Design Guidelines for Roads and Connections	The entire section	We request that road standards in the Secondary Plan and Urban Design Guidelines be "or to the satisfaction of the Town".	This has been added
Land Owners Group	Section 2.2.3 Collector Roads	<i>The collector roads...will generally have a right-of-way width ranging from 23.0m...</i>	We request a reduced ROW of 21.5m.	In order to protect for Active Transportation measures the 23m ROW will be required to accommodate cycling lanes and pedestrian boulevards.
Land Owners Group	Section 2.2.5 Local Road	<i>...A 9.0m paved roadway to accommodate two drive lanes and parking on one side of the road; and... ...The roadway width shall be minimized to slow traffic and enhance walkability, but will still include space for parking on one side of the road...</i>	Why has an increase in pavement section been proposed when Guideline 2.2.5.1 suggests that roadway widths are to be "minimized"?	The pavement width was based on accommodating parking and 2 drive lanes (2.5m and 3.25m X2) with shared cycling and was confirmed by Town. Council indicated support for defined cycling lanes , not shared.
Land Owners Group	Section 2.2.6 Private Roads	<i>...Private Roads will have a width of 8.0 to 10.5m... Access to private roads will be predominantly from public local roads. Access directly to Collector Roads is discouraged and will be limited in instances where the connection provides access to an internal private road network.</i>	We request that the minimum width be decreased to 6.9m. We request that Guideline 2.2.6.4 be updated to reflect the proposed Lincolnville road network which includes private roads interconnecting with other private roads and with collector roads. "Discouraged" to be discussed.	The 8.0m was to accommodate for the introduction of a sidewalk on one side of a private road and the 10.5m is for the intro of layby parking that may be required or introduced based on SPA review. Discouraged was to allow flexibility to the Town while making the point

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				that lanes are not to be connecting directly to the Collector Road; as per Town direction.
Land Owners Group	Section 2.2.7 Lanes	<i>Lanes will have a right-of-way width of 8.5m...</i>	We request that the minimum width be decreased to 6.9m. We also request clarification to specify whether this section applies to “public lanes”. This section should also be renamed to “Rear Lanes” to avoid any confusion with private roads which are also referred to as lanes in some contexts.	Although this width would accommodate 2 car widths it would leave little space between the lane and garage face. The 8.5m is based on 6.5m asphalt drive lane and 1.0m edge/apron in between garage and drive lane.
Land Owners Group	3.1.3 Massing, Height, and Setback	<i>6. Building heights shall generally range from 2 storeys for low-rise residential to 6 storeys for mid-rise mixed-use residential buildings. Additional height encouraged for building located in high density areas. 9. Buildings sited at the intersection of Tenth Line and the MTSA Collector Road shall have a minimum height of 6 storeys. Buildings should be stepped back at the third or fourth storey to provide a pedestrian scaled wall face. This treatment may also be applied where buildings abut public open spaces and squares.</i>	The section skips from Guideline 3.1.3.6 to Guideline 3.1.3.9 and should be renumbered. Guidelines 3.1.3.6 and 3.1.3.9 don't conform to the draft OPA regarding minimum building heights (5 storeys vs. 6 storeys). Guideline 3.1.3.10 has not been revised to reflect changes in draft OPA that allows for ground floor height flexibility (Policy 12.7.24.2). We request that Guidelines 3.1.3.6, 3.1.3.9, and 3.1.3.10 be revised to conform the draft OPA.	The revisions to these sections have been made except for the at-grade floor height.

Commenter	Section	Policy Excerpt	Request	Response
		<i>10. Mixed-use building with retail/commercial uses at grade and buildings within the high density areas along Tenth Line, shall have a minimum ground floor height of 4.5m to provide future building flexibility to convert at-grade uses to retail/commercial uses.</i>		
Land Owners Group	3.2.2 Street Townhouses	<i>...Integrated garages are accessed from the street and with a maximum width of 50% of the front face of individual units... 1. Unit widths should allow for both a garage door and an identifiable/ prominent entrance and a minimum of 6.0m width is desirable to achieve that...</i>	We request that integrated garages that are accessed from the street have a maximum width of 55%. We also request that the unit width be reduced to 5.0m.	The 6.0m width is to ensure the provision of tree planting on each unit and to provide a streetscape that is balanced between driveway / garage width and the active portion of the façade. A 5.0m unit width for frontloaded street townhouses will essentially leave 2.0m of active façade to 3.0m for the garage/driveway. The intent of the proposed guidelines is to ensure that garages do not dominate the street.
Land Owners Group	3.2.4 Back-to-back Townhouses	<i>Back-to-back townhouses are blocks configured to share a common rear wall (generally 2 units or where stacked, 4 units), with one block oriented to the street and the other to a rear lane, private driveway or street...</i>	We request clarification on blocks being oriented towards the street. We request additional clarity regarding back-to-back stacked townhouses as there are only guidelines for stacked and back-to-back townhouses.	Description was further clarified. Specific guidelines are not required for B2B stacked except for face to face separation distance.
Land Owners Group	3.3.1.3 Low Rise Apartment Buildings	<i>Apartment buildings proposed along Tenth Line and the MTSA Collector Road</i>	We request flexibility regarding the requirement for a minimum 4.5m	The Town prefers 4.5m as best practice with respect to protecting for future flexibility of at-grade

Commenter	Section	Policy Excerpt	Request	Response
		<i>intersection should incorporate a minimum ground floor height of 4.5m to allow for potential future at-grade retail and commercial uses. Zoning provisions should provide the flexibility to allow for both residential and non-residential uses at the ground floor.</i>	ground floor height along the MTSA collector.	spaces and their potential uses.
Land Owners Group	3.4.2.5 Mixed-Use Building Design	<i>A minimum floor to ceiling height of 4.5 metres should be provided on the ground floor to allow for flexibility and accommodate a variety of retail/commercial/office uses.</i>	We request that the minimum ground floor height flexibility provided for other forms like live/work townhouses be provided for mixed-use buildings.	The Town prefers 4.5m as best practice with respect to protecting for future flexibility of at-grade spaces and their potential uses.
Land Owners Group	1.3 Vision	<i>...Ensure that the Tenth Line and MTSA Collector Road intersection provides a wide pedestrian boulevard, enhanced street tree planting, landscaping, and decorative hardscaping, including supportive built form (e.g. mixed-use residential with at-grade retail commercial uses) to create a focal area within the community. Extending this along the length of the MTSA Collector Road is encouraged...</i>	We request that this section removes reference to at-grade retail along the MTSA collector road.	This is only meant for the portion within the dashed oval and what will be added for the Newstone property at the south end of the high-density mixed use designation.