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March 2, 2015

Ms. Patricia Nash
Deputy Clerk
Town of Georgina
Keswick, Ontario
L4P 3G1

Dear Ms. Nash:

**Re: Metrus Phase 9 Zoning Bylaw Amendment and Draft Plan of Subdivision
Your Files 01.139 and 03.1078**

On behalf of my client the North Gwillimbury Forest Alliance (NGFA), I would like to provide Council and staff with comments on the above applications of Metrus Development Inc. for its five affiliated landowners.

As you know, I previously commented on these applications on September 8, 2014, and appeared at the September 10, 2014 public meeting. My previous letter is enclosed, as I will be referring to it.

I have reviewed the revised draft plan and the applicant's cover letter (MacKinnon to Ross, December 15, 2014). The proposed changes do not resolve or address my concerns about the Metrus applications, as set out in my previous letter - that they are premature and therefore, not in the public interest.

The background to my concerns, regarding negotiations about a possible development approvals exchange involving Maple Lake Estates, is summarized on page 1 and in the first two paragraphs of page 2 of my previous letter. Nothing has changed since that was written.

I then reviewed the density of the proposed subdivision, on page 2 of my previous letter. The revised draft plan affects my analysis though not my conclusions. I reproduce here this section of my previous letter - changes arising from revision of the draft plan are in *italics*.

"The proposed Metrus subdivision occupies 66.5 ha. The subject lands include some areas that do not qualify as gross residential because they would be considered as natural features (blocks 828, 829, and 831), and some non-dwelling areas that are outside the Residential Neighbourhood and instead are within the Glenwoods Urban Centre (blocks 827, 830, and 837), according to the 2005 land use plan. With those areas deducted, the proposed subdivision would take up 55.1 ha (36.4%) of the undeveloped Metrus lands within the Residential Neighbourhood, and provide 862 dwellings, yielding a density of 15.7 units per gross residential hectare within the Residential Neighbourhood. (The applicant's cover letter indicates a density of 14.8 units per gross hectare, but it is not clear how *this could have been derived*.)

"While Section 9.1.3.8(f)(iv) of the Keswick Secondary Plan says that density may be increased to 16.6 units per gross hectare through the incorporation of townhouses, 'low density housing forms shall maintain a maximum density of 14.5 units per gross residential hectare'. That means very little increase in overall permitted densities, unless townhouses assume a far higher proportion of total units than Metrus has ever contemplated. In this subdivision, Metrus is proposing that 94.3% of the units be low-density; if the same percentage of the area of gross residential blocks and streets is also attributed to the single-detached dwellings, then the overall permitted density can only increase to 14.8 units/ha (14.5 single-detached units/ha permitted in that part of the subdivision occupied or attributed to them, and 21.0 townhouse units/ha proposed in that part of the subdivision occupied or attributed to them).

"I have no planning issue with higher density, but I must disagree with the applicant - in my opinion, an Official Plan amendment (to the South Keswick Secondary Plan) is required to enable the density proposed. [Staff comments at page 12 of Report PB-2014-0063, September 10, 2014, about permitted densities across the Metrus lands as a whole, only underline this concern. And why 739034 Ontario Inc. is proposing an Official Plan amendment to exempt its proposed densities from Section 9.1.3.8(f)(iv) of the Secondary Plan but Metrus is not, is not at all clear, even more so when both firms are represented by the same planning consultants.]

"Although the proposed density is higher than what is currently permitted in South Keswick, approval of these applications would still adversely affect the potential to relocate development approvals from Maple Lake Estates. In my May 29, 2014 letter [to Harold Lenters regarding the Official Plan review], I provided a relocation example of adding 625 semi-detached dwellings to what is currently permitted on the undeveloped Metrus lands, resulting in density increasing to [18.6] units per gross hectare. With the present applications approved, Metrus would be left with 96.1 ha of undeveloped lands within the Residential Neighbourhood, and at 14.5 units per gross hectare, would currently be permitted 1,393 dwellings on the remainder lands. Adding 625 semi-detached dwellings would require a density of 21.0 units per gross hectare on the remainder lands."

The above example may actually exaggerate the impacts of development approval relocation.

- ▶ The current approvals permit 1,073 two-person dwellings, on leased sites, at Maple Lake Estates.
- ▶ The example quoted above is based on numbers of people. Based on York Region persons-per-unit standards, 625 semi-detached dwellings (or 572 single-detached dwellings) in another location would accommodate the same population as the 1,073 small dwellings approved for Maple Lake Estates.
- ▶ Ideally, however, a development approvals exchange should be based on equivalent economic value (see my March 20, 2014 letter to Jim Dymant and Andrea Furniss re Official Plan review). My client retained professional land economists to estimate the market value of Maple Lake Estates under its current approvals, and the enhanced market value of Metrus lands in

South Keswick that would result from permitting additional density there to accommodate equivalent development. A conventional subdivision in South Keswick would be much more remunerative than what is currently approved at Maple Lake Estates, and as already noted, each dwelling in that conventional subdivision would accommodate more people. As a result, it is estimated that in the order of 236 additional single-detached or semi-detached dwellings in South Keswick could constitute an economically equivalent exchange for what is currently approved at Maple Lake Estates. This would cause density to increase to 16.1 units per gross hectare across Metrus's currently undeveloped lands - only marginally higher than the 15.7 units that Metrus is currently proposing in Phase 9, though without benefit of an enabling Official Plan amendment.

As I said in my previous letter, "While the proposed development reflects the 2005 South Keswick Development Area land use plan, it does not appear to acknowledge or reflect in any way the possibility of a development approvals exchange that would involve the subject lands, or the planning merits of such an exchange . . .".

Therefore, in my opinion these applications are premature and not in the public interest. I recommend that Council not approve the proposed rezoning and draft plan of subdivision, at least until all these issues of prematurity have been satisfactorily addressed, and the applications appropriately modified. My reasons are given on pages 3 and 4 of my September 8, 2014 letter, and nothing has happened since to change them.

I hope these comments will assist Council in its consideration of these applications.

Yours sincerely,

[original signed by]

Anthony Usher, MCIP, RPP

cc. Howard Friedman
Anna Geniole