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Diana DiGirolamo – Senior Planner  
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**Communication : C 6  
VMC Sub-committee  
June 21, 2022  
Agenda Item # 2**

via email: [diana.digirolamo@vaughan.ca](mailto:diana.digirolamo@vaughan.ca) / [clerks@vaughan.ca](mailto:clerks@vaughan.ca)

**Attention: Ms. Diana DiGirolamo  
Senior Planner**

Dear Ms. DiGirolamo:

**RE: VMC Secondary Plan Update Phase II – Land Use Options  
Comments on behalf of Intergreen Development (BT) Inc, 25 Interchange Way,  
Vaughan**

Malone Given Parsons Ltd. (“MGP”) is the land use planner for Intergreen Development (BT) Inc. (“Intergreen”), the owner of the lands at 25 Interchange Way (“Subject Lands”) within the Vaughan Metropolitan Centre (“VMC”). Intergreen has been actively participating in the Vaughan Metropolitan Centre Secondary Plan (“VMCSP”) Update process, including attending the VMC Landowners Meeting on May 24, 2022 where the land use options being considered in Phase II of the VMCSP Update were presented.

We have reviewed the presentation materials from May 24, 2022 and the staff reports on the June 21, 2022 VMC Sub-Committee meeting agenda and have concerns.

It should be noted that it is difficult to provide a fulsome set of comments on the Land Use Options in the absence of the City providing any policy framework. As such, our comments respond to the proposed change in land use designation on the basis of the current VMCSP policies. In our opinion, providing a summary of the land use policies, at a minimum, related to height and density, is required to understand the proposed options. Notwithstanding this, we request that:

1. The heights and densities should reflect the VMC’s status as an Urban Growth Centre. More specifically, the height and density framework in the VMCSP should be updated to have regard for approved developments which have effectively more than doubled the planned heights and densities in the current VMCSP;
2. The Subject Lands be recognized as an appropriate location for height and density and should maintain an appropriate designation that allows for significant development rather than the proposed “Neighbourhood” designation;

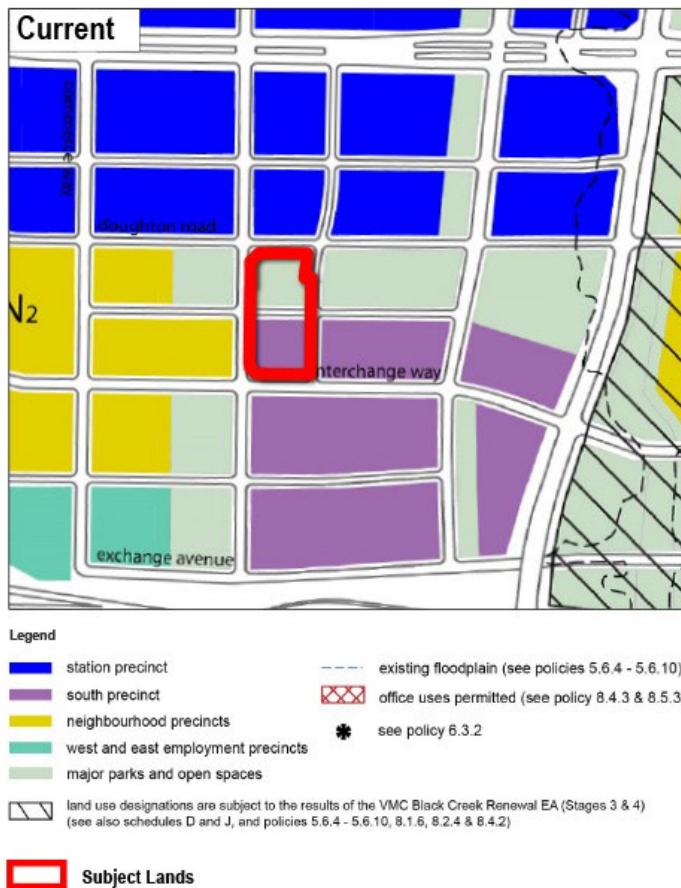
3. The Recommended Retail, Service Commercial or Public Use Frontage on the Subject Lands be moved from Interchange Way (east-west portion) to the future local road and facing the proposed public park; and
4. Policies be included within the updated VMCSPP that align with Council’s latest direction and recommendations regarding parkland definitions and dedication credits, particularly as they relate to 100% credit for strata parkland.

**Background**

The Subject Lands are located at the northeast intersection of Interchange Way (east-west) and Interchange Way (north-south). In the current VMCSPP, the southern half of the Subject Lands is designated “South Precinct” with height permissions ranging from 5 to 25 storeys and a density permission ranging from 2.5 to 4.5 FSI. The South Precinct designation encourages a mix of uses, particularly retail and office uses, and permits all uses that are permitted in the Station Precinct (being the lands to the north surrounding the VMC Subway Station). Policy 8.3.1 of the VMCSPP also promotes a variety of low- (3-4 storeys), mid- (5-10 storeys), and high-rise (more than 10 storeys) buildings within the South Precinct.

The northern half of the Subject Lands is designated Major Parks and Open Spaces. A proposed east-west local street (20 to 22 metres wide) bisects the Subject Lands between the two land use designations/precincts and a proposed north-south local street straddles the eastern boundary of the Subject Lands. A map of the current and proposed land use designations under the VMCSPP is provided in Figure 1 below.

Figure 1: Current VMCSPP Land Use Designations



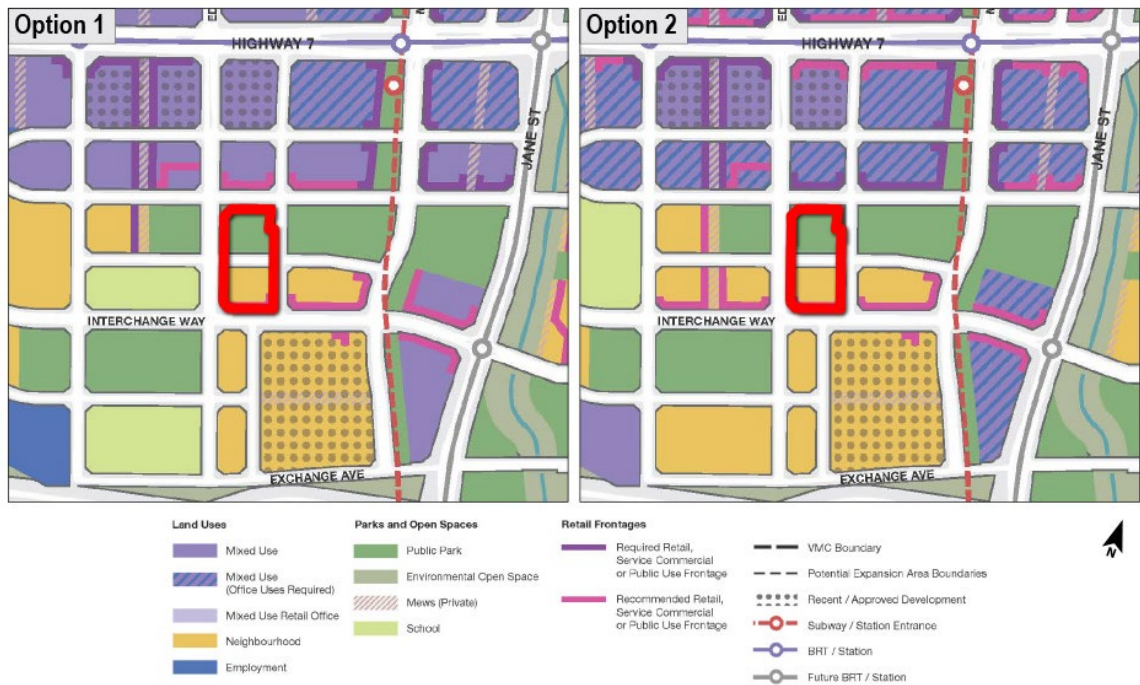
**Forthcoming Development Applications**

Intergreen attended a Pre-Application Consultation meeting with the City on October 19, 2021 and is currently preparing development applications to redevelop the Subject Lands into a high-density, mixed-use development on the south half with a public park on the north half.

**Proposed Land Use Designation**

Under the proposed VMCSPP Land Use Options, the Subject Lands are proposed to be designated “Neighbourhood” and “Public Park”. The staff report indicates that this designation change from “South Precinct” to “Neighbourhood” is “*primarily intended for residential uses, to align with the approval of neighbourhood-scaled development*”. This reference to “neighbourhood-scaled development” appears to be related to the “Mobilio” development, which we note includes both townhouses and high-density buildings up to 18 storeys on the south side of Interchange Way. While we support the notion to concentrate residential uses within this area of the VMC, we do not believe that the approval of a residential development on other lands should preclude high-density, mixed-use development on the Subject Lands or result in the loss of land use, density, and height flexibility within the VMCSPP policy framework.

Figure 2: Proposed VMCSPP Land Use Options



The materials presented to date in the VMCSPP Update process do not provide sufficient information or policies to holistically review the impacts of the proposed land use options on the Subject Lands. The staff report states that “The permissions for the “Neighbourhood” designation have been altered for Option 2, to allow for a greater mix of uses complementary to residential development”, however it is unclear what this mix of uses is

or how it differentiates from Option 1. We request that staff provide clarification on what the Neighbourhood designation specifically entails, in particular, land use permissions and built form standards, under each of the proposed land use options.

In the absence of any policies relating to the Neighbourhood designation, we request that the Subject Lands be designated to an appropriate designation that permits significant redevelopment in terms of permitted heights, densities, and built forms. The Subject Lands have many attributes that make the site suitable for high density development rather than the proposed “Neighbourhood” designation such as being within 500 metres of the existing VMC Subway Station, located with the VMC Subway MTSA, and adjacent to approved and planned high density developments.

Furthermore, we are also concerned that any planned reduction in building heights and density represents a “downzoning” on the Subject Lands which is inconsistent with provincial and regional policies.

The southern edge of the Subject Lands along the east-west portion of Interchange Way is also identified as a “Recommended Retail, Service Commercial or Public Use Frontage” on the land use options maps. Staff indicate that “Retail is generally recommended in areas generally fronting onto the parks system, and along minor collector and local roads”. On the Subject Lands, the retail frontage is identified along Interchange Way (currently identified as a Major Collector road in the existing VMC). Given that the southern half of the Subject Lands will front on a future local road opposite a future public park, we request that staff move the “Recommended Retail, Service Commercial or Public Use Frontage” identification on the map to a more appropriate location along the future local road bisecting the Subject Lands and adjacent to the planned park.

### ***Parkland***

The Proposed Land Use Options continue to identify a Park on the north half of the Subject Lands. Intergreen, as part of their proposed development, have made provisions for the inclusion of parkland on the north half of the Subject Lands which will include underground parking, making the proposed park a strata park.

Given the urban context of the VMC, the updated VMCSPP should contain greater flexibility to allow stratified parkland rather than it being conditional on the provision of significant office development. Furthermore, the parkland policies should be consistent with the June 7, 2022, draft Parkland Dedication Bylaw which was revised to reflect Council's direction provided on May 17, 2022. Council directed staff to amend the draft bylaw to allow 100% parkland credit for stratified parkland, including those encumbered by underground parking.

### ***Conclusion***

On behalf of our client, we appreciate the opportunity to provide initial comments on the Land Use Options and welcome the opportunity to meet with staff to discuss our concerns. We kindly request to be notified of any future public or landowner engagement meetings regarding this process and reserve the right to provide comments on future versions of the VMC Secondary Plan. We look forward to working with the City on the development of a vibrant downtown.

Should you have any questions, please do not hesitate to contact me.

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Vaughan

Yours very truly,  
Malone Given Parsons Ltd.



**Lauren Capilongo, MCIP, RPP**

*cc: Intergreen Development (BT) Inc.*