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June 20, 2022

Mayor Maurizio Bevilacqua and Members of Council
Vaughan Metropolitan Centre Sub-Committee
2141 Major Mackenzie Drive
Vaughan, ON
L6A 1T1

Sent by email: clerks@vaughan.ca

Dear Mayor Bevilacqua and Members of Council:

**RE: ITEM 4.2 – VMC SECONDARY PLAN UPDATE: PHASE II – LAND USE OPTIONS
171 MAPLECRETE ROAD, 140 AND 160 DOUGHTON ROAD (the “Subject Lands”)
171 MAPLECRETE LIMITED PARTNERSHIP (the “Landowner”)
OUR FILE 1512W**

We have been retained by the Landowner in connection with the VMC Secondary Plan process. On behalf of our client, we have reviewed the Staff Report on the VMC Secondary Plan Update and the proposed Land Use Options. The Subject Lands are located at the northeast corner of Doughton Road and Maplecrete Road.

We provide the following comments on the Land Use Options and general policy considerations at this time:

A) School Site in the Southeast VMC Expansion Lands

1. While we acknowledge the desire to increase infrastructure and services in the VMC to address its further development as Vaughan’s Downtown, for the reasons stated below, we do not agree with Land Use Option 1 relative to the proposed school site depicted on the Subject Lands.
2. We have not been provided with any analysis which confirms whether a further school site, in addition to the four already identified in the current VMC Secondary Plan) is warranted. We request this analysis be provided for review and commentary prior to the Land Use Options being finalized.
3. As discussed in detail when the current VMC Secondary Plan was being created and refined, greater emphasis should be placed on providing schools in a Downtown location within an urban (more intensified), rather than suburban, built form. The current VMC Secondary Plan policies encourage this already (through Policies 7.2.4 and 7.2.5), however, this encouragement should be

modified to become a requirement to more efficiently utilize land and optimize infrastructure in the VMC as called for by Provincial policy.

4. If a further school site is warranted, we do not believe that the Subject Lands are the appropriate location. The location identified in Option 2 is preferable for multiple reasons. First, locating the school on the north side of Doughton Road takes intensification opportunity away from the Subject Lands which enjoy closer proximity to transit services on Highway 7 and the subway station. Second, Doughton Road forms a natural Mixed Use area boundary, rather than splitting the boundary midway through the block. Third, the school site in Option 2 which has a better school -park relationship and is a larger site which can consequently be utilized by both school boards, as noted in the staff's report.
5. Lastly, we request that any Updated Secondary Plan mapping depict school sites as symbols, rather than land use designations. Should the School Boards not proceed with a school as depicted in the VMC Secondary Plan, properties should continue to enjoy land use permissions. This approach was taken in the current VMC Secondary Plan both in terms of mapping and policy (Policy 7.2.1) and it is our opinion that this approach should continue in any Updated VMC Secondary Plan.
6. Notwithstanding the foregoing, our client believes it is imperative that the City implement a cost sharing program in connection with this plan, so as not to punitively target the Subject Lands or any other landowners in either option.

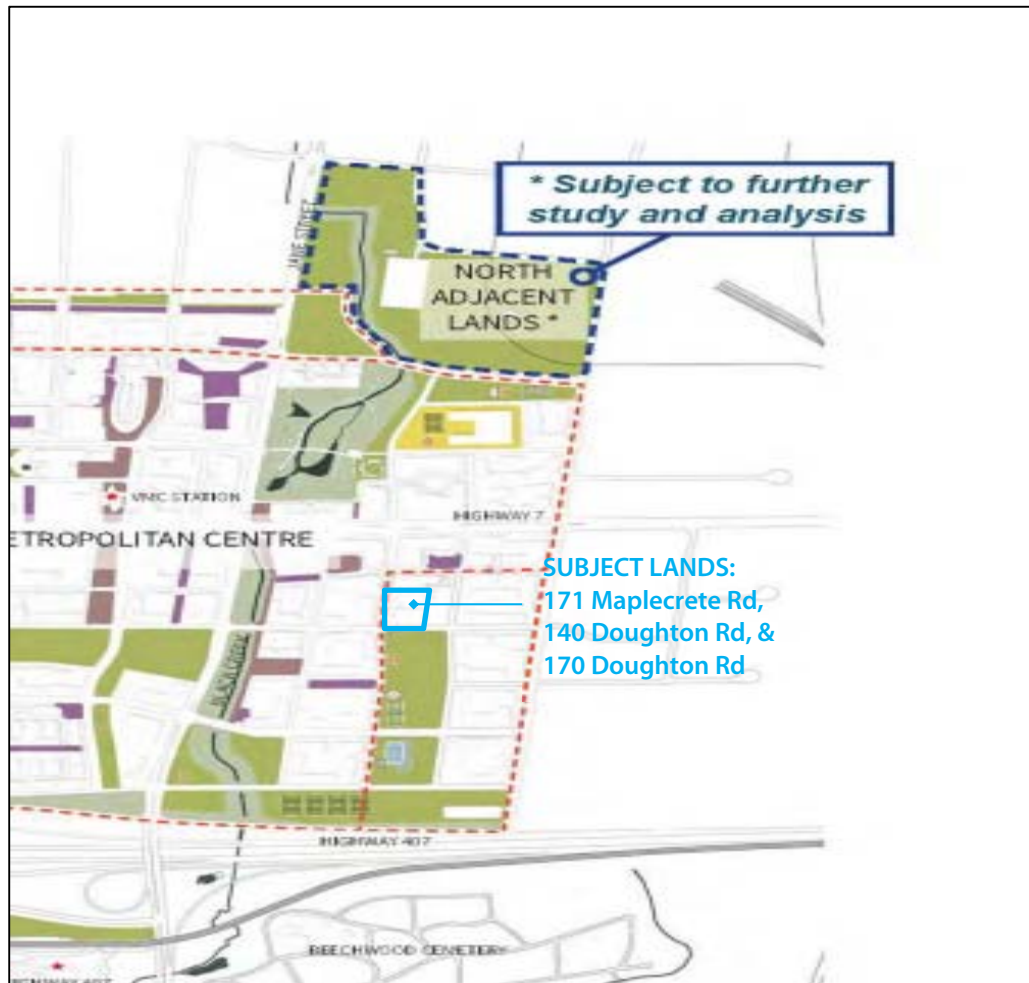
B) Land Use Designations and Policies

1. As an initial comment on land use designations and policies, we wish to remind Council that a great deal of time and effort was undertaken in the creation and refinement of the current VMC Secondary Plan. While no land use policies have been provided at this time, through the Land Use Options, it appears that new designations, and thus new policies, will be drafted. This is appropriate in an update process, however, our client does not believe wholesale changes to the policies are necessary, as the current policies have resulted in the great success shown to date through the construction occurring in the VMC.
2. Flexibility should be inherent in the policies to allow for development to meet market conditions, pivot to meet emerging needs, and promote great architecture and design to occur. Overly prescriptive policy requirements should be avoided.
3. We would appreciate revised policies be provided for review and comment as soon as possible in the next phase of the Update Project. If possible, this should be provided in a track change or comparison chart format for ease of review and reference between the existing and proposed policies.
4. The predominant use for the southeast expansion lands should be residential, balanced with supporting uses, so as not to create a monoculture of uses (i.e. not all residential and not all employment). In other words, the community which is being created in the southeast quadrant expansion should include the same broad mix of uses as current VMC Precincts. As such, the Mixed Use designation is preferable for the Subject Lands as shown in Land Use Option 2.

5. In our client's view, housing should be made a priority in the updated VMC Secondary Plan. Ontario is in a housing crisis as has been reported widely in the media, acknowledged by all levels of government, and expressed in the Report of the Ontario Housing Affordability Task Force, dated February 8, 2022. To combat this crisis, there is a need to provide additional housing as quickly as possible.
6. The demand for office space has decreased as a result of the Covid-19 Pandemic and the increased work from home initiatives by many employers. The City should continue to focus office uses where employers want to be in the VMC which is in proximity (within 250 m) of the subway. Placing office uses on the periphery of the VMC is not consistent with good planning, with the exception of population serving offices (i.e. doctor's, dentists, professional services, etc). To this extent, our client prefers the Office Requirement proposal in Land Use Option 1, which continues to focus offices in and around the subway station. Current incentive programs should continue and / or be expanded to incentivize office development in the VMC.
7. A mix of heights and densities needs to be provided to support the infrastructure investments made by the Province, Region, and City. Minimum residential densities (not maximums) should be required in order to optimize these infrastructure investments. Heights should radiate from the Jane Street eastward and from Highway 7 southward from existing and proposed heights. With respect to the Subject Lands, a continuation of the heights and densities from the north, as has been recently proposed/approved, would be appropriate.
8. While MTSA Boundaries have been defined by the Region, once the Updated Secondary Plan is adopted by Council, we request that the City request the MTSA boundaries be expanded accordingly to include the expansion lands north of Doughton Road.

C) Parks and Open Space

1. Our client supports community building and the inclusion of parks and open space within all of their developments. To this extent, our client supports the use of public parks (full ownership and/or strata) and privately owned publicly accessible spaces (POPS) to enhance the liveability of the expanded VMC area.
2. Our client also supports and encourages the City to utilize the significant amounts of parkland dedication funds which have been collected to date through VMC projects for the purchase of lands for parkland within and immediately surrounding the VMC. Early acquisition of property for parkland by the City will result in cheaper acquisitions occurring (as land costs continue to increase over time) and the ability to implement new park development and programming earlier in the development process (i.e. concurrent or before private sector development occurs).
3. Our client is generally in support of the proposed parks (as shown below) in an update to the VMC Parks and Wayfinding Master Plan (from Slide 20 of the Public Presentation, March 3, 2022), stretching from Doughton Road to Highway 407, and on the east side of Maplecrete Road. The parks will serve the anticipated growth in population from the Subject Lands, immediate neighbourhood, and the entire VMC Secondary Plan area. Given the location of the proposed parks, tall buildings on the Subject Lands are appropriate as they will not have material impact on the parks in terms of sun and shadow.



In conclusion, we appreciate the efforts made by City staff and the Consulting Team to date in the VMC Secondary Plan Update process. However, further work and refinement is required as noted above. We would be pleased to meet with City staff and the Consulting Team to discuss our commentary further and to work with them proactively to ensure that the Update VMC Secondary Plan continues the tremendous success that has been achieved to date in the VMC.

Thank you.

Yours truly,

MHBC

David A. McKay MSc, MCIP, RPP
Vice President & Partner

cc: Project Team