

December 9, 2022

Haiqing Xu  
Deputy City Manager  
Planning and Growth Management  
Vaughan City Hall, Level 200  
2141 Major Mackenzie Drive  
Vaughan, ON L6A 1T1

Dear Mr. Xu,

**Re: Proposed Amendment to Vaughan Official Plan Section 10.1.3 and By-Law 278-2009  
File 25.7  
Draft Official Plan Amendment No. 93**

Urban Strategies Inc., are the land use planners for RioCan REIT (“**RioCan**”) with respect to their lands at 7501-7621 Weston Road, also known as the Colossus Centre, a 25-hectare site south and east of Highway 7 and Weston Road (the “**Colossus Centre Site**”).

The Colossus Centre Site is within a Primary Centre, one of Vaughan’s Intensification Areas, and is currently the subject of active official plan amendment applications (OP.22.002 and OP.22.005). RioCan plans to bring forward future Zoning By-law Amendment, Site Plan, and Plan of Subdivision applications for the Colossus Centre Site as part of their long-term vision to urbanize and transform this location into a complete community in accordance with Provincial and Regional policy direction and in line with the City’s goals for Primary Centers to become mixed-use, transit-oriented, pedestrian-friendly places.

Council is being asked to approve changes to the Vaughan Official Plan’s pre-consultation and complete application submission requirements further to proposed Official Plan Amendment No. 93 (“**OPA 93**”). Although we support improvements to the City’s development application process that will result in clearly a defined, logical and efficient process that is supported by the statutory provisions of the *Planning Act*, we have concerns with the proposed policies of OPA 93 including but not limited to policies 10.1.3.2, 10.1.3.4, 10.1.3.5, 10.1.3.6, 10.1.3.9 and 10.1.3.13 as follows:

Policy 10.1.3.2 indicates that policy conformity issues may be identified in the pre-application consultation and that the applicant will need to address these issues to ensure a complete application. Policy conformity should be discussed through an application review and should not be pre-requisite for an application. Further, the potential requirement for a Design Review Panel meeting and pre-application public meeting are not, in our opinion, included in an appropriate interpretation of the prescribed “information and material” contemplated in the *Planning Act* that may be required for a complete application to amend the land use planning framework for a property.

Policy 10.1.3.4 outlines an open-ended requirement for any information, reports and studies to be identified through the pre-application consultation meeting. This policy creates uncertainty around what the specific requirements are during the pre-application stage and is not sufficiently clear.

Further it does not meet an appropriate interpretation of the prescribed “information and material” contemplated in the *Planning Act* and results in a lack of certainty and consistency around what constitutes a complete application.

Policy 10.1.3.5, along with 10.1.3.1.13 suggests that peer reviewed studies may be part of a pre-application submission and appears to require that such a peer review be completed before an application is deemed complete. The need for a peer review should be determined through the development application review process, not before it.

Policy 10.1.3.6 includes a requirement for an application to confirm zoning compliance. This requirement appears illogical when the purpose of an application may be to seek a change to official plan and zoning permissions and therefore cannot by its very nature demonstrate zoning compliance.

Policy 10.1.3.9 would have the effect of eliminating the concurrent processing of Site Plan, Zoning By-law and Official Plan Amendments. Combining the processing of applications allows for comprehensive consideration of issues related to the same facts, contexts and policy frameworks. Consecutive processing of applications will create an inefficient process that will require greater amounts of staff and applicant time and resources, which would prolong the development approvals process. In addition, the prevention of concurrent applications is not consistent with the statutory process for amendments outlined in the *Planning Act*.

While we appreciate the need to consider changes to the development planning application process to address the Bill 109 timelines, the proposed approach in OPA 93 would create a circuitous process with greater amounts of uncertainty which may result in further delays to the delivery of housing and the realization of Provincial, Regional and City planning goals. We encourage Council to direct staff to explore an alternative solution that may address the City’s objectives while also enabling a logical, clear and efficient development application process.

Sincerely,

**URBAN STRATEGIES INC.**



Leigh McGrath, RPP, MCIP  
Partner