

Communication: C14
Committee of the Whole (2)

June 6, 2023

Item #6

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June 5, 2023

MGP File: 21-2950

Mayor and Members of Council
City of Vaughan
2141 Major Mackenzie Drive
Vaughan, ON L6A 1T1

via email: clerks@vaughan.ca

Dear Mayor Del Duca and Members of Council:

**RE: Proposed Amendment #93 to the City of Vaughan Official Plan, 2010
June 6, 2023, Committee of the Whole Item 6**

Malone Given Parsons Ltd. (“MGP”) is the Planning Consultant for Argo Kleinburg Limited and the Block 62 West Landowners Group, who own approximately 107 gross hectares of land within the City of Vaughan. Block 62 West is located northeast of Nashville Road and Huntington Road and is intended to accommodate growth up to the 2031 planning horizon in the City of Vaughan.

On behalf of Argo Kleinburg and the Block 62 West Landowners Group, we have reviewed the Proposed Amendment (being Policy 10.1.3 and By-law 278-2009 as amended) in response to Bill 109 (More Homes for Everyone, 2022), City File 25.7, Committee of the Whole Report No. 6, dated June 6, 2023.

We are concerned that the proposed OPA to the Vaughan Official Plan 2010 (“VOP 2010”) has an unintended consequence of lengthening the Pre-application Consultation (“PAC”) process prior to the commencement of complete application timelines and increases the timeline for development application approvals overall within the City of Vaughan. In our opinion, the OPA is contrary to the intent of Bill 109, the More Homes for Everyone Act, 2022, which supported expedited approvals to build homes faster.

We appreciate that the City has made some revisions to the draft Official Plan since the public meeting held in December 2022 however we continue to have concerns as noted below:

1. Length of the Pre-Consultation Validity (Proposed Policy 10.1.3.5 & 10.1.3.6)

Given the extensive list of plans and reports that are required to support a complete application, we request that the term of the Pre-consultation **be increased from 180 days to 365 days** to allow for sufficient time to complete the various studies and materials to support the development applications. We note that the environmental and technical reports typically require a year or more of data collection and analysis and can be seasonally dependant. As such, a 180-day window is not sufficient to allow for the completion of these studies within that timeline.

2. Minimum Pre-Application Requirements (Proposed Policy 10.1.3.3(b))

The draft Amendment proposes to require owners' authorization for the submission of a Pre-Application meeting. This should be limited to the applicant who is proposing the pre-application meeting. We note that larger scale site applications such as Block Plan or an Official Plan Amendment often cover larger areas where all parties within the area are not required to sign applications.

3. Preliminary Elevations for Pre-Consultation (Proposed Policy 10.1.3.3(f))

Policy 10.1.3.3. prescribes the minimum requirements for the submission of a Pre-Application Meeting application. The minimum list includes the submission of "Preliminary Elevations". We note that in many cases, such as subdivision plans, Block Plans, some official plan or zoning amendments (such as an addition to or change in use), elevations are not relevant and should not be required.

4. Standard Terms of Reference Guidelines (Proposed Policy 10.1.3.4)

It is unclear who prepares and who approves the standard terms of reference referred to. We believe that if standard City-wide Terms of References are to be prepared, these should be reviewed and approved by Council.

5. The City refusal of information and materials (Proposed Policy 10.1.3.6(e))

It is unacceptable to give staff the unilateral ability to indicate that a study that has been submitted is inappropriate/incomplete and to refuse the entire application. We do not think that this is the intent of the Policy, and this wording should be clarified.

6. Draft Plan of Condominium (Common Element)

Throughout the Draft Official Plan reference is made to Draft Plan of Condominium (Common Element). We question why specific reference is made to only one type of condominium plan.

7. GIS conformity Letter 10.1.3.11 (b)xxvii) The requirement for a GIS conformity letter prior to submission of an application is an onerous requirement at first submission, particularly for engineering plans which are extremely detailed and subject to change after comments are received. GIS Conformity letters should be a requirement later in the approval process. With the volume of applications received by the City, the GIS section is often short of time and there is no specified minimum timeline to obtain a GIS Conformity Letter. We note that this item is included in the list that may be required by the City in 10.1.3.7.

8. Block Plan Approval 10.1.3.14 The requirement for an approved Block Plan as a component of a complete application for a subdivision application is a change from the City's approval process to date. Block Plans typically take several years to approve, have multiple rounds of comments and submissions, involve multiple owners and have substantially completed most studies required for a subdivision application after the second submission. Often there can be one or two items that delay approval of a Block plan in an area that does not affect an application for

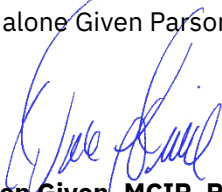
approval in another part of the plan. We request that the last sentence of policy 10.1.3.14 be amended to allow for some discretion on the part of the City.

Conclusion

We thank you for the opportunity to provide our preliminary comments and requests on the proposed Pre-Consultation and Complete Application Submission Requirements OPA and look forward to continuing to engage with Staff through further discussions. These are our preliminary concerns and we may have more to add at a future date. Should you have any questions or wish to discuss our comments, please do not hesitate to contact me at 905.513.0170

Yours very truly,

Malone Given Parsons Ltd.



Don Given, MCIP, RPP
Founder

cc *Block 62 West Landowners Group (See attached map)*
Haiqing Xu, City of Vaughan
Fausto Filipetto, City of Vaughan

Block 62 West Landowners

