

June 5, 2023

MGP File: 11-2003

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 the Block 41 Landowners Group, who own approximately 297 gross hectares of land within the City of Vaughan. Block 41 is one of two New Community Areas intended to accommodate growth up to the 2031 planning horizon in the City of Vaughan.

On behalf of the Block 41 Landowners Group (“LOG”), 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 previously made a written submission to the City dated December 9, 2022 and many of those comments continue to be applicable. Overall, we continue to be 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 some of which are outlined below. We reserve the right to identify additional issues as we continue our review of the modified OPA.**

**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 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, which will hold up 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

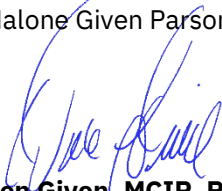
comments and submissions, involve multiple owners and have substantially completed most studies required for a subdivision application after the second submission. Often there can be one or two items that delay approval of a Block plan in an area that does not affect an application for approval in another 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 input on the proposed Pre-Consultation and Complete Application Submission Requirements and look forward to continuing to engage with Staff through further discussions. 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 41 Landowners Group*  
*Haiqing Xu, City of Vaughan*  
*Fausto Filipetto, City of Vaughan*