

October 2, 2023

Project No. 23196

Committee of the Whole
Vaughan City Hall
2141 Major Mackenzie Drive West
Vaughan, ON L6A 1T1

Submitted via email to: clerks@vaughan.ca

Dear Committee Members,

**Re: Official Plan Review: Proposed Part A Official Plan Amendment
Statutory Public Meeting – October 3, 2023
281187 Ontario Ltd. and Anland Developments Inc.**

Bousfields Inc. is the planning consultant for 281187 Ontario Ltd. and Anland Developments Inc. (the “Owners”) with respect to their lands located east of Weston Road and south of Rutherford Road including 8955 Weston Road and lands immediately north, specifically PINS: 032800301, 032800173, and 032800289 (the “subject lands”). The subject lands comprise approximately 29 hectares (72 acres) and are located in the Vaughan Mills Centre Secondary Plan area.

We understand the City is undertaking an update of the Vaughan Official Plan (2010) in two parts. The scope of this letter relates to the draft Part A Official Plan Amendment, which deals solely with conformity to the York Region Official Plan, and Provincial Plans, policies, and legislation.

We have reviewed the materials prepared by Staff which include the draft Part A Official Plan Amendment (the “OPA”) Redlined Text and Schedules, and request that changes be made to reflect the direction of the 2022 York Region Official Plan (the “ROP”) with respect to the subject lands. As stated in Staff’s report to the Committee, *“The City is required to update the Vaughan Official Plan, 2010 to maintain conformity with the York Region Official Plan and Provincial Plans, policies and legislation”*.

In November 2022, the Minister of Municipal Affairs and Housing approved the York Region Official Plan with modifications. The approved Regional Official Plan includes a site-specific policy applicable to the subject lands which states:

“4.2.33 Special provisions for the lands in the City of Vaughan, located in the southwest quadrant of the intersection of Highway 400 and Rutherford Road, comprised of the following PINS: 032800301, 032800173, and 032800289. Notwithstanding any other policies in this plan to the contrary, the minimum density of 200 units per hectare applicable to the whole of the lands and a minimum building height of 18 storeys for any high density residential built form on the site.”

Furthermore, the ROP designates the subject lands as *Community Area* on Map 1A – Land Use Designations.

REQUESTED CHANGES

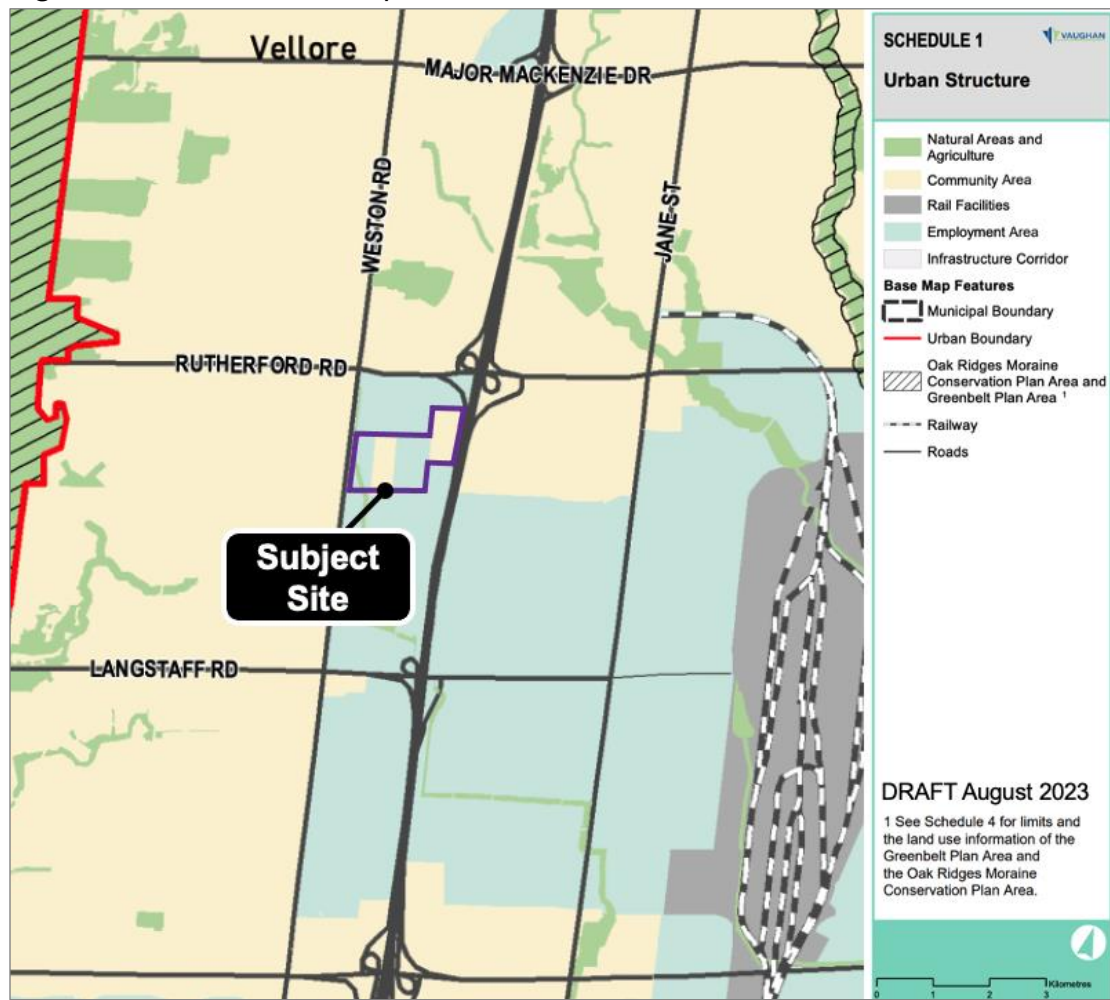
Respectfully, we request the following changes be made to ensure conformity is maintained with the ROP:

1. **Schedule 1 – Urban Structure:** Redesignate the portion of the subject lands that are identified as *Employment Area* to *Community Area*. See **Figure 1**.
2. **Schedule 1A – Strategic Growth Areas:** Designate the subject lands as a *Primary Centre*, as they are designated for significant intensification and within the Vaughan Mills Centre Secondary Plan area, which is predominantly identified as a *Primary Centre*. See **Figure 2**.
3. **Section 2.2.8 – Phasing Growth:** Revise policy language to recognize that development can and should occur simultaneously in intensification areas and include policy language that acknowledges the ability for landowners to front-end finance the delivery of infrastructure.

1. SCHEDULE 1 – URBAN STRUCTURE

The draft Part A OPA includes an updated Schedule 1 – Urban Structure, which designates the subject lands as *Community Area* and *Employment Area*, which does not conform to the ROP. The ROP designates the entirety of the subject lands as *Community Area* and we request that Schedule 1 – Urban Structure be updated to reflect this designation prior to the draft Part A OPA being brought to Council for adoption. Figure 1 shows the location of the subject lands in relation to Schedule 1 – Urban Structure.

Figure 1 – Schedule 1 Excerpt

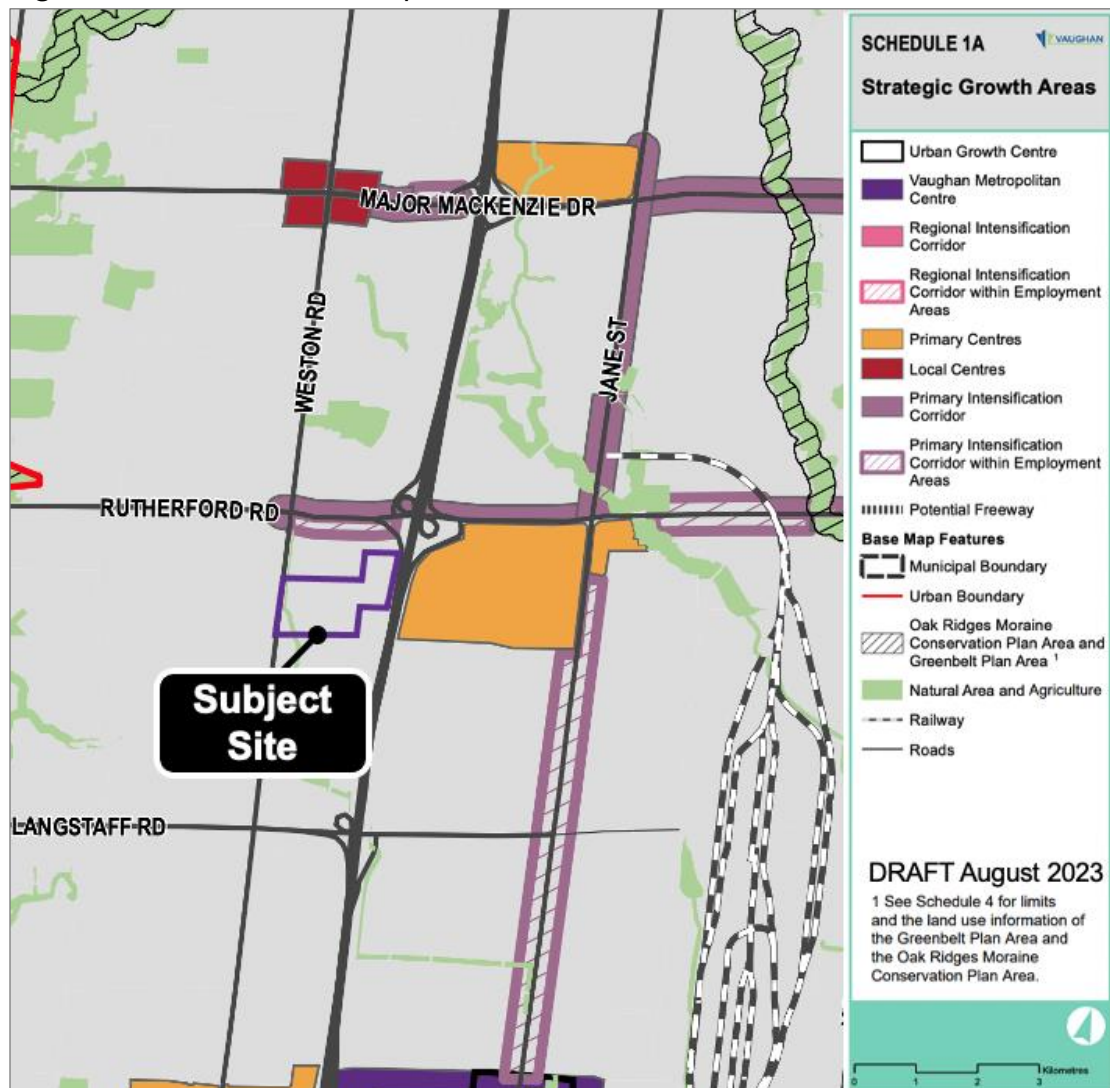


Source: Official Plan Review – Draft Part A OPA Schedules

2. SCHEDULE 1A – STRATEGIC GROWTH AREAS

In our opinion, the subject lands should be designated as a *Primary Centre* on Schedule 1A – Strategic Growth Areas. As noted above, the ROP site-specific policy establishes a minimum density of 200 units per hectare applicable to the whole of the subject lands and a minimum building height of 18 storeys for high density residential built form. The minimum height and density established in the ROP provides for a significant level of intensification on the subject lands, and it is appropriate to recognize the planned level of intensification by designating the subject lands as a *Primary Centre*. Figure 2 shows the location of the subject lands in relation to Schedule 1A – Strategic Growth Areas.

Figure 2 – Schedule 1A Excerpt



Source: Official Plan Review – Draft Part A OPA Schedules

With respect to *Primary Centres*, policy 2.2.1.1(d)(iii) of the draft Part A OPA states that *Primary Centres* are locations of intensification accommodated in the form of predominantly mixed-use high- and mid-rise buildings, developed at an intensity supportive of transit. Section 2.2.5 states that *Primary Centres* accommodate a wide range of uses and will have tall buildings, as well as lower ones, to facilitate an appropriate transition to neighbouring areas. Furthermore, policy 2.2.5.5 states that *Primary Centres* shall be planned to, among others: develop at densities supportive of public transit; include a mix of non-residential uses; and develop with a mix of housing types and tenures, including housing suitable for seniors and families with children and affordable housing.

In our opinion, based on the minimum height and density planned for the subject lands and the proposed policies of the draft Part A OPA regarding Strategic Growth Areas and *Primary Centres*, the subject lands should be identified as a *Primary Centre*. The subject lands are required to develop with a minimum density of 200 units per hectare and a minimum building height of 18 storeys for high density residential built form, which will be developed in the form of predominantly high- and mid-rise buildings, at an intensity that is supportive of public transit, and with a mix of uses to support the level of development including retail and community uses. The minimum height and density for the subject lands align with the policies for development within *Primary Centres*, and this should be reflected in the City's Official Plan to maintain conformity with the ROP.

3. SECTION 2.2.8 – PHASING GROWTH

It is acknowledged that there are capacity constraints within the City of Vaughan that must be overcome before the City can grow as intended. Given the infrastructure limitations in the City, there is a high degree of uncertainty in development timing for landowners.

The draft Part A OPA policies establish that the allocation of growth must be strategically phased, and that certain areas have the capacity to play a more significant and immediate role in accommodating short term growth and intensification, such as development within the Vaughan Metropolitan Centre and along Highway 7, proceeding first (Section 2.2.8).

Growth within the City's Strategic Growth Areas is intended to be prioritized based on properties and/or development meeting certain criteria such as proximity to public transit, sufficient drinking water and wastewater servicing capacity, availability of publicly funded educational facilities, existing and diverse retail services, and community services (Policy 2.2.8.2). Similarly, draft Part A OPA policies relating to municipal services establish that development should be sequenced in an orderly way, coordinated with water, wastewater and transportation capacity, residential and non-residential development thresholds, the provision of human services, community facilities and other infrastructure. (Policy 8.2.1.3).

We agree with the direction of the draft Part A OPA policies to appropriately phase growth in a manner that ensures new development is viable and contributes to the creation of a complete community, and further follows the Strategic Growth Area

hierarchy established by the VOP 2010. However, we are concerned that the policies, as drafted, could be interpreted to establish a preferential timeline for development to occur in certain areas of the City over others. We recommend that the draft Part A OPA policies be updated to recognize that development can and should occur simultaneously in other areas of the City, including *Primary Centres* and other key intensification areas.

Further, we recommend that the draft Part A OPA text acknowledge the ability for landowners to front-end finance and/or undertake full coordination of upgrading infrastructure in the City to allow development to proceed in an orderly fashion. Consideration should also be given to ensuring that upgrades to community amenities secured through development agreements are considered, instead of relying on them being readily available prior to development commencing.

Finally, we recommend that the draft Part A OPA policies acknowledge the ability of the City of Vaughan to complete an Area-Specific Development Charge study, in accordance with the Development Charges Act (1997) and associated regulations, and subsequent update to the City's Development Charge By-law, for new or existing Secondary Plan areas. The policies should further address the timeline for the preparation and completion of such an Area-Specific Development Charge study.

CONCLUDING THOUGHTS AND NEXT STEPS

We appreciate the opportunity to participate in the review of the Vaughan Official Plan. In our opinion, the changes described above are necessary to ensure the Vaughan Official Plan maintains conformity with the ROP. We respectfully request that these changes be given consideration prior to the draft Part A OPA being brought to Council. We have copied the City's Planning Staff on this letter to engage and address these comments. We will be reaching out to them separately to meet and identify actions to address our concerns. We look forward to continuing to work with the City of Vaughan through the Official Plan Review process in order to help plan the City's growth and development to 2051.

Please contact the undersigned or David Milano of our offices should you have any questions or comments.

Respectfully Submitted,
Bousfields Inc.



David Falletta, MCIP, RPP

cc: *281187 Ontario Ltd.*
 Anland Developments Inc.
 F. Filippetto, City of Vaughan
 C. Bruce, City of Vaughan