

HUMPHRIES PLANNING GROUP INC.

FOUNDED IN 2003

June 2, 2025
HPGI File: 22824

SUBMITTED VIA EMAIL:

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City of Vaughan

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Vaughan, Ontario
L6A 1T1

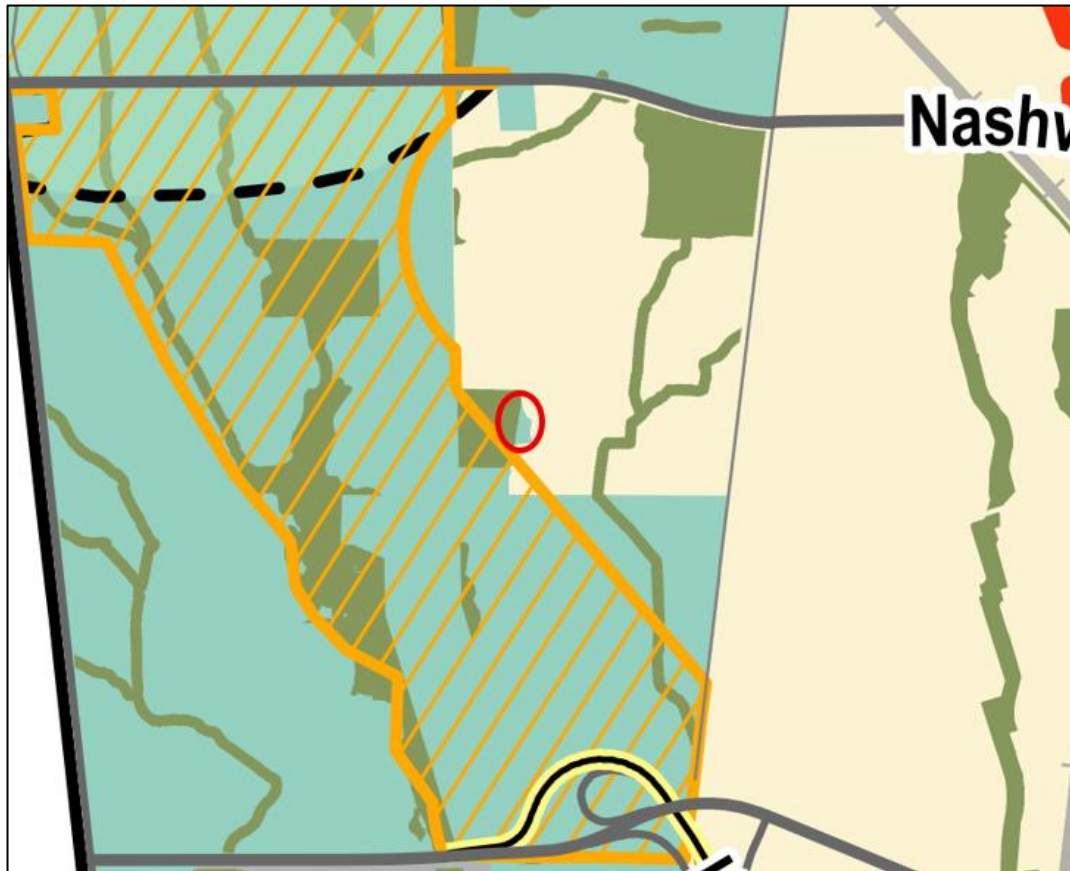
Attn: Fausto Filipetto, Project Manager

Re: Draft New Vaughan Official Plan 2025 (May 2025 Draft)
Part of Lots 23, 24 and 25, Concession 10 (Block 66E)
Block 66 (East) Landowners Group Inc.

Humphries Planning Group Inc. ("HPGI") represents the Block 66 (East) Landowners Group Inc. (the "Group"), owners of the lands legally known as Part of Lots 23, 24 and 25, Concession 10 in the City of Vaughan. In May 2025, the latest draft New Vaughan Official Plan 2025 (the draft 'new VOP') was released to the public for review and comment. It is our understanding that the City is receiving comments for the draft new VOP in order to allow staff to consider them while revising/updating the draft new VOP. HPGI had previously sent in a comment letter on February 26, 2025, attached herein for reference to our previous comments. Based on our review of the latest draft, we wish to provide the following comments as they relate to the Group's Lands.

Land Use

The current mapping for the lands on Schedule 1 – Urban Structure indicates that a small portion of the Block 66E area near the southern woodlot is designated as *Employment Area* (circled in red below). This is incorrect and should be revised to show it as *Community Area*.



Recommendation: Schedule 1 be revised to correct the mapping error near the southern woodlot.

Built Form & Development Policies

Section 4.3 of the draft VOP provides for built form and development policies which seek to provide a clear set of intentions and expectations for how buildings should be developed in different parts of the City. Comments were previously provided regarding this section (previously known as Section 3.3 in earlier drafts); refer previous comments regarding this section and the policies within the attached letter February 2025. As per our previous letter, we believe the language used in this section is too prescriptive and should be removed and subsequently implemented through the Zoning By-law.

Recommendation: Remove prescriptive language from the draft new VOP and implement through the Zoning By-law.

Road Network

Schedule 9A – Street Classification shows an east-west major collector road. It is our understanding that this road is to be eliminated. As such, the schedule should be revised by removing the east-west collector major collector road.

Recommendation: Schedule 9A of the new draft VOP 2025 be revised to remove the east-west major collector road.

Infrastructure

Section 4.7 of the draft new VOP sets of infrastructure policies including water, sanitary, stormwater and other servicing provisions.

Section 4.7.2.2 states that " *To ensure deep foundations for tall buildings in the Urban Area be fully waterproofed*".

Recommendation: Refine policy to state that "fully waterproofed parking garages should only be required if within the seasonally high groundwater table".

Section 4.7.2.14(a) states:

That, in coordination with York Region, water and wastewater systems shall be sized to consider the potential for expansion of the service area, Intensification and increased servicing allocation where permitted by this Plan, York Region Master Plans and Provincial plans, based on planning horizons, as determined by the City of Vaughan, into areas designated for urban Development and to accommodate all natural tributary areas subject to:

- a. phasing growth in new communities to provide for substantial completion, approximately 75%, of one phase prior to proceeding to future phases;*

Recommendation: Add "unless otherwise approved by the City" to Policy 4.7.2.14(a).

Section 4.7.3.6 states that it is the policy of Council "To work with the Region and relevant agencies to implement the long-range Integrated Urban Water Master Plan that assesses existing and planned stormwater facilities and systems and outlines stormwater Infrastructure requirements for new and existing Development".

It is recognized that the wording of this policy was revised to specify the long-range

Integrated Urban Water Master Plan instead of a long-range stormwater master plan. However, the reference to York Region should still be removed as their involvement in stormwater master planning is not required.

Recommendation: Remove reference to the Region of York as their involvement in stormwater master planning is not required.

Section 4.7.3.11 states that it is the policy of Council " *To require that proposed stormwater management quality, quantity, erosion control and water balance for ground water and natural features be developed as part of a Master Environment and Servicing Plan to permit proper assessment of Development impacts upon environmental features*".

Recommendation: Modify policy to add "where applicable at the Block Plan and subdivision stage".

Section 4.7.3.16 states that it is the policy of Council " *To require that all Significant Developments provide post-Development stormwater quantity control to pre-Development levels for all storm events and stormwater quantity control in accordance with current guidelines in consultation with the TRCA and the Ministry of Environment, Conservation and Parks. Should a subsequent TRCA-approved Watershed hydrology study indicate that an alternative runoff control requirement is appropriate, alternative criteria may be established by the City in consultation with TRCA*".

Recommendation: Removing the word "subsequent" as approved watershed hydrology studies already exist that require alternative criteria in specific areas.

4.7.3.8(a), 4.7.3.12, and 4.7.3.14 reference consultation with the Province or MECP. There are several instances that make reference to consultation with the Province or the MECP. **However, we ask that the City add "where applicable" to these sections as consultation with MECP is not always required. In most cases, it may be sufficient to address technical concerns with only the City and the Conservation Authority**

In addition to the above, for policies related to the Greenbelt Plan, such as policy 2.9.2.21, it is unclear why the City is not relying on the Greenbelt Plan wording. For example, remove clauses a, b and c, and add "in accordance with the Greenbelt Plan", similar to policy 2.9.2.16 for stormwater management infrastructure within the Greenbelt.

Thank you for your consideration of our comments and we look forward to working closely with Council, Staff and other stakeholders throughout the completion of the Official Plan Update.

On behalf of the Group, we request to be notified concerning the City's Official Plan Review including any and all future Council/Committee meetings, community meetings and consultation as well as the release of any discussion papers or proposed amendments to the VOP.

Yours truly,

HUMPHRIES PLANNING GROUP INC.

A handwritten signature in cursive script that reads "R. Humphries".

Rosemarie Humphries BA, MCIP, RPP
President

cc. *Block 66 (East) Landowners Group Inc.*

Atch. Letter – HPGI Comment Letter on January 2025 version of Draft New Vaughan
Official Plan 2025, dated February 26, 2025

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SUBMITTED VIA EMAIL: oprmanager@vaughan.ca**City of Vaughan**

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Attn: Fausto Filipetto, Project Manager**Re: Draft New Vaughan Official Plan 2025****Part of Lots 23, 24 and 25, Concession 10 (Block 66E)****Block 66 (East) Landowners Group Inc.**

Humphries Planning Group Inc. ("HPGI") represents the Block 66 (East) Landowners Group Inc. (the "Group"), owners of the lands legally known as Part of Lots 23, 24 and 25, Concession 10 in the City of Vaughan. In January 2025, the draft New Vaughan Official Plan 2025 (the draft 'new VOP') was released to the public for review and comment. It is our understanding that the City is beginning to receive and review comments for the draft new VOP in order to allow staff to consider them while revising/updating the draft new VOP. Based on our review of the draft new VOP, we wish to provide the following comments as they relate to the Group's Lands.

Land Use

The current mapping for the lands on Schedule 1 – Urban Structure show that a small portion of the Block 66E area near the southern woodlot is designated as *Core Employment Area*. This is incorrect and should be revised to show it as *Community Area*. As well, the mapping on Appendix 1 – Provincial Decisions show the approved regional employment conversion for the lands. However, the boundary of the conversion is showing that the southern woodlot is part of that conversion and that 10356 Huntington Road is not. This is incorrect; the noted woodlot does not form part of the approved conversion while 10356 Huntington Road does – the mapping should be revised to reflect this. Further, it is shown that the lands directly south of Block 66E are part of an approved regional employment conversion which does not match what is shown on the Region's Land Use Designations (i.e., Employment Area).

Recommendation: Schedule 1 and Appendix 1 of the new draft VOP 2025 be revised to reflect the approved employment area conversion correctly.

Block Plans

Policy 5.1.1.14 of the draft VOP provides policy related to the Block Plan process. The following is stated:

That the City may, at its discretion, identify areas subject to a Block Plan process through:

- a. the Secondary Plan process; or*
- b. the development review process, to address complexities in smaller planning units, scoped as required in accordance with policy 5.1.1.15.*

The Group is in the process of preparing a Privately Initiated Official Plan Amendment with subdivision level detail. **As such, we request that the Group be exempt from the Block Plan process.**

Road Network

Schedule 9A – Street Classification and Schedule 9B – Street Types shows an east-west major collector road. It is our understanding that this road is to be eliminated. As such, the schedules should be revised by removing the east-west collector major collector road.

Recommendation: Schedule 9A and 9B of the new draft VOP 2025 be revised to remove the east-west major collector road.

Natural Heritage

Policy 3.6.3.2 states that *the policy text of Section 3.6.3 prevails over the mapping shown on Schedule 2 in determining the Natural Heritage Network. The precise limits of mapped natural heritage features, and any modifications to the mapped network, will be determined through appropriate study undertaken in consultation with the Toronto and Region Conservation Authority and the Province.* Consultation with TRCA seems inappropriate given their new regulatory role under the Conservation Authorities Act.

Recommendation: Remove all statements referring to the review, approval, clearance and/or recommendation by the TRCA from this policy.

Section 3.6.3.6, which applies to all natural features but is mostly relevant for valley and stream corridors, states that the feature limits *is inclusive of any natural hazard*

components, including but not limited to, the long-term stable top of slope/bank, stable toe of slope, regulatory floodplain, and or meander belt and any contiguous natural features or areas.

This policy is concerning as it relates to:

- The consideration of natural hazard limit for natural features. It would be better to consider natural hazards and natural features separately as in some cases hazard limits can be re-engineered (floodplain spill way); and,
- the reference to *contiguous natural features or areas* (TRCA concept) which can lead to encompassing any kind of non significant treed vegetation contiguous to wetland/streams.

Recommendation: Review this policy and take into consideration the potential concerns listed above.

Section 3.6.3.19 provides scoped down guidance on how lands adjacent to core areas should be evaluated for identification as Enhancement Areas:

- a. corridors and/or Linkages of an appropriate width and design to facilitate movement of target species, for the main branch of West Robinson Creek and in the upper Purpleville Creek subwatershed;*
- b. upland habitat of Wetlands within which biophysical functions or attributes directly related to the Wetland occur, and based on knowledge of species present and their use of habitat types; and*
- c. Woodland enhancements to improve forest connectivity, size, shape, and interior habitat*

Precise/explicit criteria for the definition of Enhancement Areas is not provided in the draft new VOP. For example, Core Features (within the BOP 2010 Unapproved Areas) can be deleted or added based on criteria within the existing VOP/PPS but the Enhancement Areas are not supported by any specific definitions/criteria.

Recommendation: Provide precise/explicit criteria for the definition of Enhancement Areas.

Sections 3.6.4.20 to 3.6.4.22 provides policies related to Wetland protection. Section 3.6.4.21.d states that non-Provincially Significant Wetlands outside of provincial plan areas that are *determined by the TRCA to have features to be protected shall be maintained in*

their current location and their current state. This is not consistent with the new Conservation Authority Act under which protection of natural heritage features/ecological function has explicitly been removed from the mandate of Conservation Authorities.

This section also states that this determination by TRCA does not apply *if it is demonstrated through technical studies (i.e., Environmental Impact Study) completed to the satisfaction of the TRCA, that the ecological and hydrological function of the wetland area is minimal and all efforts to protect the wetland through the mitigation hierarchy (i.e., avoid, minimize, mitigate, compensate) have been exhausted.* As stated above, TRCA is no longer required to be consulted for reviewing impacts to ecological functions.

Recommendation: Remove all statements referring to the review, approval, clearance and/or recommendation by the TRCA from this policy.

It is further stated in this section that compensation must be directed to *on-the-ground ecosystem restoration*. It is unclear whether if cash-in-lieu payment is permitted or not and further clarity is required.

Recommendation: Clarification be provided in this section to make clear if cash-in-lieu payment is permitted.

Infrastructure

Section 3.2 of the draft new VOP sets of infrastructure policies including water, sanitary, stormwater and other servicing provisions.

Section 3.10.2.2 (f) states that *"To prioritize the efficient and sustainable use of drinking water sources, including ensuring deep foundations for tall buildings in the Urban Area be fully waterproofed"*.

Recommendation: Revise policy to include additional guidance that states "full waterproofed parking garages should only be required if within the seasonally high groundwater table".

Section 3.10.3.9 states that it is the policy of Council *"To work with the Region and relevant agencies to develop and implement a long-range stormwater master plan that assesses existing and planned stormwater facilities and systems and outlines stormwater infrastructure requirements for new and existing development"*.

Recommendation: Remove reference to the Region of York as their involvement in stormwater master planning is not required.

Section 3.10.3.17 states that it is the policy of Council *"To require that proposed storm water management quality, quantity, erosion control and water balance for ground water and natural features be developed as part of a Master Environment and Servicing Plan in order to permit proper assessment of development impacts upon environmental features"*.

Recommendation: Modify policy to include "at the Block Plan stage" and "subdivision" to provide additional clarity and guidance.

Section 3.10.3.25 states that it is the policy of Council *"To require that all significant development provide post-development stormwater quantity control to pre-development levels for all necessary storm events and stormwater quantity control in accordance with current guidelines in consultation with the Toronto and Region Conservation Authority and the Ministry of the Environment. Should a subsequent Toronto and Region Conservation Authority approved watershed hydrology study indicate that on alternative runoff control requirement is appropriate, alternative criteria may be established by the City in consultation with the Toronto and Region Conservation Authority"*.

Recommendation: Removing the word "subsequent" as approved watershed hydrology studies already exist that require alternative criteria in specific areas.

Section 3.10.3.11(a), 3.10.3.18(a), and 3.10.3.21 reference consultation with the Province or MECP. There are several instances that make reference to consultation with the Province or the MECP. However, formal consultation with MECP is not always required.

Recommendation: Including "where applicable" as consultation with MECP is not always required. In most instances, it may be sufficient to address technical concerns with only the City and Conservation Authority.

Built Form & Development Policies

Section 3.3.2 of the draft VOP provides for built form and development policies which seek to provide a clear set of intentions and expectations for how buildings should be developed in different parts of the City. Specifically, Section 3.3.2.20 states that:

"To ensure permeability between groupings, any given block of Townhouses, Stacked Townhouses, and/or Back-to-Back Townhouses shall have a maximum linear length of 40

metres."

However, within the City's Urban Design Guidelines, Performance Standard No. 5.3.5, Townhouse Design, states the following:

"a. Townhouse blocks should not exceed 80 metres"

Imposing a maximum linear length of 40 metres per block is too restrictive, and there should be greater flexibility and consistency with the City's UDG. Furthermore, these are detailed design matters not appropriate to be located in an Official Plan document and there should be no prescriptive design policies incorporated in the document.

Recommendation: Remove Policy 3.3.2.20.

Sections 3.3.2.16 to 3.3.2.33 provide for additional policy requirements which relate to the design of the built environment. In many instances, prescriptive requirements associated with setbacks, unit sizes, building separation, etc. are provided which in our opinion are more appropriately defined in the implementing zoning by-law. The draft new VOP policies appear to be drafted in a compulsory manner and if rigidly applied would result in excessively strict obligations which, in our view, will stifle and unnecessarily restrict development or create the requirement for unnecessary OPA's.

As a general rule, official plans are intended to be broad documents of municipal planning and their policies should be broad and purposive while still being capable of clear interpretation. The Draft OPA fails to achieve this balance through the unduly prescriptive nature of the policies. Official Plan policies are generally not required to achieve the desired outcomes and technical site issues can be adequately addressed through zoning by-laws.

Recommendation: Remove prescriptive language from the draft new VOP and implement through the Zoning By-law.

Thank you for your consideration of our comments and we look forward to working closely with Council, Staff and other stakeholders throughout the completion of the Official Plan Update.

On behalf of the Group, we request to be notified concerning the City's Official Plan Review including any and all future Council/Committee meetings, community meetings and

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Yours truly,

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Rosemarie Humphries BA, MCIP, RPP
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