

City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

C153.
Communication
CW(PM) – June 4, 2025
Item No. 10

June 3, 2025
File 11766 & 6057-1

Attn: Mayor and Members of Council

**RE: Comment Letter in Response to Draft VMC Secondary Plan
31 Maplecrete Road & 44 Creditstone Road
City of Vaughan**

Weston Consulting has been retained to provide planning assistance for D'Angelo Group Ltd., the legally registered landowner of the property municipally known as 31 Maplecrete Road, and 352087 Ontario Limited, the legally registered landowner of the property municipally known as 44 Creditstone Road (collectively the "subject lands") in the Vaughan Metropolitan Centre ("VMC") area of the City of Vaughan. On behalf of the registered landowners, Weston Consulting is actively monitoring the VMC Secondary Plan Update process, and we have engaged in the process through various meetings with City Staff and the submission of letters and correspondence addressing various matters impacting the subject lands.

Description of the Subject Lands

The subject lands are located on the east side of Maplecrete Road, northeast of the intersection with Peelar Road and generally south of Highway 7. 31 Maplecrete Road has an approximate area of 0.81 hectares (1.99 acres) and an approximate frontage of 64.84 metres along Maplecrete Road. 44 Creditstone Road extends the entire depth of the block between Creditstone Road and Maplecrete Road with a total lot area of approximately 1.62 hectares (4.0 acres) and frontage on three public streets including Creditstone Road (approximately 65 metres), Peelar Road (approximately 251 metres), and Maplecrete Road (approximately 65 metres). In conjunction with the property located at 66 Creditstone Road, 31 Maplecrete Road and 44 Creditstone Road form a complete block bounded by Creditstone Road to the east, Peelar Road to the south, Maplecrete Road to the west, and the proposed Interchange Way extension to the north.

The subject lands are located within the VMC Expansion Area A as endorsed by City Council and are surrounded by predominantly existing industrial and office uses, including, metal machinery supplier, auto repair shops, steel fabricators, building supplies, manufacturing, and institutional uses including a hockey rink, driving school, banquet centre, and more.

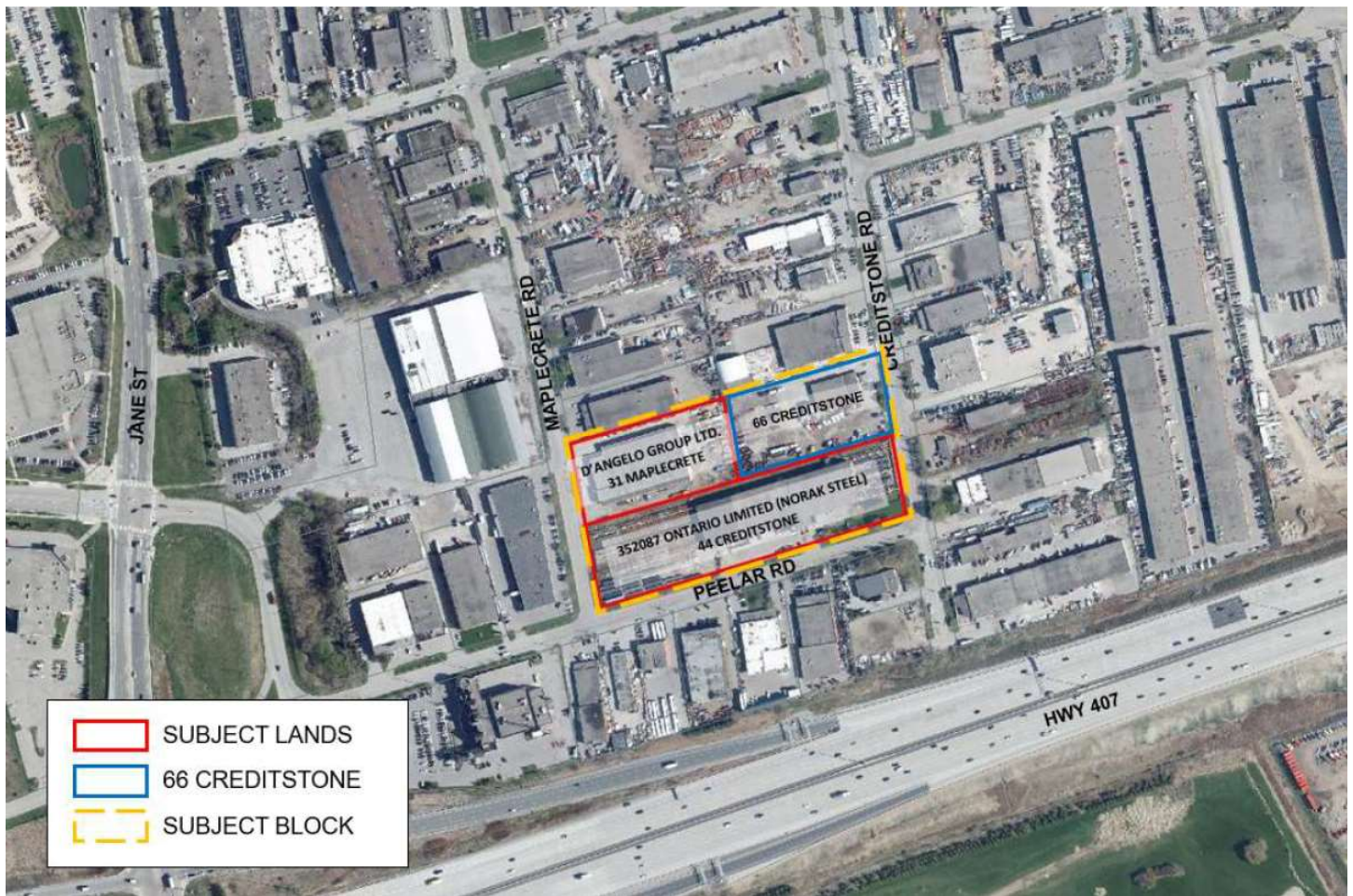


Figure 1 – Air Photo of Subject Lands

Comments on the Draft VMC Secondary Plan, 2025

On May 15, 2025, the City released a draft of the new VMC Secondary Plan, 2025 (the “Draft VMCSPP”). We have reviewed the Draft VMCSPP on behalf of the landowners and are pleased to provide the following comments. We have also reviewed the draft Vaughan Official Plan, 2025 (“Draft VOP 2025”) also released on May 15, 2025 in the preparation of the enclosed comments.

In accordance with Draft Schedule G – Land Uses, the subject lands are proposed to be designated:

- *Public Park* (western portions of 31 Maplecrete and 44 Creditstone);
- *Neighbourhood* (eastern portion of 31 Maplecrete and central portion 44 Creditstone); and
- *Mixed Non-Residential* (eastern portion of 44 Creditstone).

Additionally, the Interchange Way frontage of 31 Maplecrete is proposed as a *Recommended Retail, Service Commercial, Integrated Community Facility or Public Use Frontage*; however, the frontages along Creditstone Road, Peelar Road and the new north-south public road through the centre of the block are not identified as either *Required or Recommended Retail, Service Commercial, Integrated Community Facility or Public Use Frontage* in accordance with Draft Schedule H – Areas for Retail, Service Commercial, or Public Uses.

Land Use

- As noted in previous submissions, the subject lands are currently proposed in the Draft VMCSPP to accommodate public lands for a north-south local road, significant public parkland, as well as the Interchange Way extension. As previously noted, if the subject lands are required to dedicate land for all of this public facilities/infrastructure, the developable area of these lands is significantly constrained. In particular, the landowners have previously expressed concern with the Public Park designation on the subject lands and are continuing to work with City Staff to address their concerns with this designation. Given the stance taken by City Staff regarding pushing the Interchange Way extension alignment further south from its location as identified in previous iterations of the Plan, the landowners are seeking further reductions to the parkland designation in order to protect the development viability of the subject lands in consideration of the significant land on the subject lands being proposed for public purposes.
- The Draft VMCSPP contains new policies related to orderly development. In particular, draft policy 4.3.2 requires each phase of development to “contribute significant non-residential uses” and/or “contribute significantly to the provision of community services”. This policy language is unreasonably vague. It is not clear based on the policies and definitions contained in the Draft VMCSPP and the Draft VOP 2025 what “significant” means in this context and what would represent a significant contribution of non-residential uses and/or community services.
- Notwithstanding the above, draft policy 9.8.5 seeks to restrict non-residential uses in the Neighbourhood designation for frontages that are not identified on Schedule H as required or recommended commercial frontages to small-scale, neighbourhood oriented commercial uses. We question the reasoning for restricting such frontages to small-scale uses, particularly in an area such as the VMC which is intended to accommodate the greatest intensity and mix of uses, and to develop as a complete downtown community. It is noted that the proposed definition of “Small-scale Convenience Retail” contained in the Draft VOP 2025 specifically excludes restaurants. Given the context and objectives of the VMC, we do not believe it is appropriate to restrict the types of non-residential uses in this manner in the VMC.
- Draft policy 9.3.1 appears to be brought forward from the current VMC Secondary Plan, but does not provide a specific or comprehensive list of permitted uses within the Neighbourhoods designation, unlike the Mixed Use designation for which a detailed list of permitted uses is clearly identified.
- As it relates to the Mixed Non-Residential designation (formerly Employment Precincts), the policies of the current VMC Secondary Plan include direction on circumstances where service commercial and large-scale retail uses are permitted. Based on our review of section 9.4 of the Draft VMCSPP, it is not clear whether service commercial uses and large-scale retail uses are permitted as-of-right in the Mixed Non-Residential designation. Given that the permitted uses within the Mixed Non-Residential designation are limited and exclude residential uses, we recommend that the policies of section 9.4 be clarified to include explicit permissions for service commercial and large-scale retail uses.

Stratified Parking

- Draft policy 5.3.8 contains criteria associated with the consideration of stratified parking below public rights-of-way. It is noted that these policies appear to be stricter than those comparable policies contained in the current VMC Secondary Plan.
- Similarly, Draft policy 7.4.1 contains similar criteria associated with the consideration of stratified parking below public parkland, which are also stricter than those comparable policies in the current VMC Secondary Plan.
- While draft policies 5.3.8 and 7.4.1 appear to allow for stratified parking below public rights-of-way and public parkland in certain circumstances, namely where extreme hydrogeological and/or technical conditions make it technically unfeasible to accommodate parking under buildings or private amenity space, we believe that more flexibility is needed.

- It is recommended that consideration also be given the financial feasibility of providing underground parking, particularly on sites such as the subject lands that are heavily constrained by lands identified for public purposes (i.e., public roads and public parks). Due to the proposed roads and parkland identified to be accommodated on the subject lands, the size of the developable area of the subject lands is significantly restricted and so is the amount of land available to accommodate below grade parking structures. It is important in circumstances like the subject lands that there is enough flexibility to accommodate stratified parking below public parkland and public roads to enable a viable development.

Public Parkland

- Draft policy 7.1.12 identifies that the design of parks and open spaces “shall be guided by” the VMC Parks & Wayfinding Master Plan; however, draft policy 7.6.1 requires that park design “conform with” the Parks & Wayfinding Master Plan. As the Parks & Wayfinding Master Plan is not a statutory document, we recommend that draft policy 7.6.1 be deleted or revised to be consistent with draft policy 7.1.12 in requiring that park design “be guided by” the Parks & Wayfinding Master Plan and not be required to “conform with” it.

Built Form

- It is noted that draft policy 9.9.1.c is brought forward from the current VMC Secondary Plan; however, it defines high-rise buildings as those over 10 storeys. In contrast, the Draft VOP 2025 defines high-rise buildings as those over 12 storeys in height. We request this discrepancy be addressed and that the VMCSPP be consistent with the VOP 2025 in defining high-rise buildings as those generally over 12 storeys.
- Draft section 9.9 contains various urban design and built form policies, some of which are very prescriptive. In general, we believe that many of these policies are more appropriate in the Urban Design Guidelines and/or the Zoning By-law, rather than in the Secondary Plan. However, if such policies are to be included in the VMCSPP, sufficient flexibility must be provided particularly for sites that are constrained by their size and/or lands required for public purposes (i.e., public roads, public parks, etc.). We acknowledge that the Draft VMCSPP includes draft policy 10.4.8 which allows for minor variations from numerical standards without amendment to the plan. However, it is important that this provides sufficient flexibility to consider alternative design approaches where there are unique circumstances on a site-by-site basis.
- Draft policy 9.9.26 seeks to require a minimum tower separation of 35 metres in the Neighbourhood designation, whereas tower separation in the Mixed Use designation is the standard 25 metres. It is unclear as to the justification for increasing the tower separation distance requirements in the Neighbourhood designation. It is further noted that the minimum tower separation distance for high-rise buildings is 25 metres in the Draft VOP 2025 and there is no reference to a 35-metre tower separation in the Draft VOP 2025. As such, we request that the VMCSPP be consistent with the VOP 2025 and that a minimum tower separation distance of 25 metres be maintained for towers in the Neighbourhoods designation.
- In addition to the above, there are potential concerns due to a lack of flexibility and impracticality of some of the numerical standards associated with various built form/urban design related policies of the Draft VMCSPP, including but not limited to the requirement for minimum 3-bedroom units, the minimum build-to line, the maximum podium height, and building exteriors. We are continuing to review and evaluate these proposed policies and may provide further comments in this regard.

Other Comments

- Draft policy 6.5.2 seeks to require all applicable development proposals located in Intensification Areas to meet or exceed LEED Silver. We question the appropriateness of construction-level details within a secondary plan. Furthermore, we note that this was previously a policy that encouraged private development to strive for LEED Gold or higher in the current VMC Secondary Plan (Policy 5.5.2). We have concerns with the requirement as it may not be feasible for all developments to achieve LEED Silver. Additionally, we believe this requirement may be an error. The Draft VOP 2025 requires that Plans of Subdivision and major Site Plans

within Strategic Growth Areas shall meet or exceed the Silver threshold of the City's Sustainability Metrics Program, not LEED Silver (draft policy 4.6.2.1). We request that the same language contemplated in the Draft VOP 2025 be used in the VMCSPP such that all developments in the VMC are not required to achieve LEED Silver.

Concluding Remarks

We respectfully submit and request that consideration be given to the enclosed comments as Staff proceed to finalize the Draft VMCSPP and the Draft VOP 2025. The above comments are provided based on our initial review of the Draft VMCSPP and the Draft VOP 2025. We reserve the right to provide further detailed comments as part of the ongoing public consultation we understand is to be held over the summer 2025.

As indicated at the March 6, 2025 meeting and through previous meetings and discussions with City Staff, we understand it is the intention of Staff to continue to work with the landowners through the ongoing VMC Secondary Plan Update process.

We appreciate the collaborative approach and opportunity to provide these comments. If you have any questions or require further information, please contact the undersigned Sandra Patano at extension 245 or Jessica Damaren at extension 280.

Yours truly,

Weston Consulting

Per:



Sandra K. Patano, BES, MES, MCIP, RPP
Partner, Planning Lead



Jessica Damaren, BES, MCIP, RPP
Senior Planner, Hearings and Special Projects

- c. D'Angelo Group Ltd.
- 352087 Ontario Limited
- M. Helfand, Aird & Berlis LLP
- G. Soucy, City of Vaughan
- C. Gray, City of Vaughan
- C. Bruce, City of Vaughan