

C162. Communication CW(PM) – June 4, 2025 Item No. 10

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File: PRO-546

June 3, 2025

Via e-mail to weston7@vaughan.ca; clerks@vaughan.ca

City of Vaughan Region of York 2141 Major Mackenzie Drive Vaughan, ON, L6A 1TI

Attention: Hon. Mayor Del Duca and Members of City of Vaughan Council

Re: Weston 7 Secondary Plan Draft #5 City of Vaughan, Region of York Comments from Weston 7 Landowners Group and individual registered landowners

KLM Planning Partners Inc. is the land use planning consultant representing the Weston 7 Secondary Plan Landowners Group (the **"W7LOG"**). The W7LOG formed in January, 2024 to coordinate input on the draft Weston 7 Secondary Plan (**"W7SP"** or **"Secondary Plan"**) process for the Weston 7 Secondary Plan Area (**"Weston 7"** or **"W7"**). Since that time, we have been actively engaged with the City of Vaughan (the **"City"**), participating in regular meetings with staff and providing feedback on previous drafts of the Secondary Plan and related initiatives. In addition to this regular engagement, the W7LOG and registered landowners provided correspondence to the City through the letter dated January 21, 2025, regarding Draft #4 of the W7SP and key W7LOG concerns. A copy of this letter is attached for your review.

The W7LOG represents approximately 58.4% of lands within the Secondary Plan area (see Appendix I: Weston 7 Landowners Group Ownership Map), and includes the following individual landowners:

- 2371933 Ontario Inc.
- Calloway Reit (400 and 7) Inc.,
- Calloway Reit (Westridge) Inc.,
- Canadian Property Holdings (Ontario) Inc.,
- Canadian Tire Properties Inc.,
- Costco Wholesale Canada Ltd.,
- CP REIT Ontario Properties Limited,
- Dev-West Properties Inc.,
- Gallu Construction Inc.,
- Kingsmoor Developments Inc.,
- Marino ON 7 Inc.,
- N.H.D. Developments Limited,
- PEM (Weston) Limited Partnership, and
- PEM (Weston) GP Inc.

This letter is being submitted on behalf of each individual landowner as members of the W7LOG in respect of the staff report related to the W7SP which is being considered at a Statutory Public Hearing on June 4, 2025, as part of the new Vaughan Official Plan 2025 (**"Draft VOP"**).

We appreciate the City's ongoing efforts to include the W7LOG in the process, and we are pleased to provide the following high-level comments on Draft #5 of the W7SP for consideration.

1. Growth Management

The W7LOG continues to have concerns regarding the proposed Growth Threshold of 26,000 people and jobs as outlined in Draft #5 and informed by the W7 Transportation Master Plan (**"W7TMP"**). We recognize and concur that growth must be aligned with infrastructure capacity, however, the Secondary Plan as drafted does not provide sufficient direction to achieve full build out to the planning horizon of 2051 and beyond.

The W7SP identifies the area as a Primary Centre, makes frequent reference to the area having potential for substantial growth and density, and references the "ultimate intensification" of Weston 7 (policy 7.2.1 (b)), however, the details of the full build-out are not well established. The Secondary Plan also refers to the planning horizon of 2051, but despite this, the Growth Threshold only contemplates growth to 2041.

In addition, the W7LOG has concerns with relying on the W7TMP to establish the Growth Threshold in the Secondary Plan. It is our understanding that this analysis did not include an investigation of how broader changes to traffic patterns in Vaughan and surrounding municipalities will impact Weston 7, or explore additional interventions that may increase capacity in the near term. We recognize that this analysis may have been outside the scope of work for the W7TMP, however, it is critical for a comprehensive understanding of growth potential.

To support growth to the planning horizon of 2051 and beyond within Weston 7, we suggest the following policy revisions:

1.1 Refer to the current Growth Threshold of 26,000 people and jobs as the "Initial Growth Threshold" throughout the Secondary Plan, which would identify growth capacity to 2041.

This change would emphasize the preliminary nature of the current threshold as being tied to certain planned transportation infrastructure investments, while recognizing that the Growth Threshold will change over time as increased capacity is unlocked through future infrastructure investments and innovation.

1.2 Introduce flexibility in the targeted mix of people and jobs to 2041, in recognition of the existing non-residential uses in Weston 7.

The proposed mix of 10,000 jobs and 16,000 people to make up the 26,000 Growth Threshold does not account for existing non-residential uses in Weston 7, which currently make up the entirety of the Secondary Plan area. The Growth Threshold to 2041 should be an overall figure and not include a specified ratio of people and jobs, in recognition that continued employment provided by existing non-residential uses will continue to exist in various forms while Weston 7 is intensified over time.

1.3 Introduce an "Interim Growth Threshold" to 2051 based on the W7SP Draft #3 threshold of 54,500 people and jobs, which can be pursued without an amendment to the secondary plan. This would be drafted in conjunction with policies to ensure sufficient infrastructure capacity as a condition of development approval.

We recommend that development up to an identified Interim Growth Threshold of 54,500 people and jobs be permitted without an amendment to the Official Plan, subject to studies that demonstrate, to the satisfaction of the City, that sufficient capacity exists or will exist at the time of development. If the intent of the Growth Threshold is to ensure growth is supported by infrastructure, this can be accomplished through planning tools other than a time consuming and costly OPA process.

These policies would be further supported through tools such as Holding Provisions through zoning approvals, and we appreciate that policy language identifying these tools has already been incorporated into Draft #5 of the Secondary Plan.

1.4 Work with the W7LOG to finalize the ultimate capacity target and incorporate this analysis into the Secondary Plan; conceptually identify this as the full build out target in the Secondary Plan.

As an example, the preamble to Chapter 4 in the Vaughan Metropolitan Centre (**"VMC"**) Secondary Plan identifies projected growth to the planning horizon of 2051, and a projected full buildout figure beyond the planning horizon. The same visioning is appropriate for Weston 7 as a Primary Centre and key area of future development.

As such, we recommend working with the W7LOG to identify potential ultimate capacity for Weston 7, acknowledging that such growth would be contingent on sufficient infrastructure, and a large percentage of this growth would be anticipated beyond the 2051 planning horizon.

Establishing a vision for the full build out of these lands will ensure that Weston 7 is prioritized for investment by all levels of government as a Primary Centre and provide clarity to landowners and the public regarding the City's objectives. This approach is also consistent with the Provincial Planning Statement 2024 and intent of the City's Official Plan as a long-term planning document.

1.5 Refine policies to inform phasing and coordination of infrastructure to achieve the ultimate intensification of Weston 7, supported by the W7LOG.

The W7LOG suggests stronger policy direction with respect to the long-term phasing and coordination of development in Weston 7. Specifically, we recommend strengthening section 8.2.1 to include reference to revisiting infrastructure and capacity studies for W7 at regular intervals to ensure that growth continues to advance. This policy revision should also acknowledge that changes to the Growth Threshold may result from such studies, and this would be permitted without amendment to the W7SP.

We also recommend policies that recognize the role of the W7LOG as a prospective partner in progressing growth in the Secondary Plan Area. This should include policies that permit and recognize infrastructure and capacity studies led by the W7LOG, which would be undertaken in collaboration with the City. These W7LOG-led studies have the potential to introduce innovation and provide an additional lens to the understanding of the growth capacity in W7.

1.6 Ensure policy framework permits incremental development and flexibility for additional analysis and innovation.

The W7TMP resulted in a list of specific infrastructure improvements (Appendix I of Draft #5) that are said to be "required" to meet the Growth Threshold of 26,000 people and jobs (policies 2.2(b) and 7.1.3(b)). We strongly recommend revising this policy language to make it clear that development can occur incrementally as transportation improvements occur, and that not all development will be prohibited or discouraged until all of these investments are entirely complete.

Further, flexibility should be introduced to account for alternative analysis that provides different options to achieve targeted growth, in addition to or instead of those in Appendix I. As discussed above, regularly revisiting capacity studies will be crucial to understanding changes in capacity over time, and the W7SP policies should enable this as an overarching policy direction document.

2. Permitted Height and Density

Previous drafts of the Secondary Plan incorporated policies that supported flexibility in permitted heights (see W7SP Draft #4 policies 4.2.2(b), 4.2.3(b), 4,2,4(b)). While we appreciate the removal of the portion of these policies that referred to the provision of "enhanced contributions" given recent changes to S. 37 of the *Planning Act*, the W7LOG strongly supports the general intent to provide flexibility for maximum heights subject to land use compatibility considerations. As an aside, it is understood that community benefits will also be provided through the new Community Benefits Charge framework.

In addition, Draft #5 of the W7SP provides direction for the calculation of density (Floor Space Index, **"FSI"**) that is concerning to the W7LOG and not aligned with the proposed definitions in the Draft VOP. The Secondary Plan proposes to calculate FSI on the basis of net developable area, which as currently defined would exclude lands to be conveyed for public purposes. This could have the effect of penalizing landowners located in areas where larger land conveyance is required for roads, parks, etc., and would require additional administration and negotiations among landowners to ensure equity.

To ensure clarity, fairness, and efficiency, we recommend the following policy revisions:

2.1 Reintroduce flexibility with respect to heights in all land use designations.

Re-introducing policy language that permits increased heights subject to demonstration of land use compatibility, appropriate transition to adjacent uses, and capacity considerations would support efficiencies in the development process as well as support the City's residential and employment targets. It is also in keeping with the designation of Weston 7 as a Primary Centre, identified as an area in which significant growth will be directed.

2.2 Align definitions with the Draft VOP; calculate FSI on the basis of Gross Developable Area to ensure that density calculations are equitable for all landowners.

Aligning definitions with the Draft VOP as identified in Table 1 below, and clarifying through policy that the FSI shall be calculated based on Gross Developable Area will reduce the amount of coordination required among landowners, will encourage the delivery of public infrastructure including roads and parks, and will contribute to a more streamlined development process.

Table 1: Definitions

Definition	W7SP Draft #5	Draft Vaughan Official Plan (May 2025)
Floor Space Index	Floor Space Index is a measure of density as it relates to built-form. Floor Space Index is the ratio of Gross Floor Area to the Net Developable Area of the site	The quotient obtained by dividing the total Gross Floor Area of all buildings on the lot, by the lot area
Net Developable Area	Net Developable Area is the area of the site excluding any lands to be conveyed for public purposes such as public streets, natural heritage features, road widenings, parks and public schools	All lands available for Development for both private and public uses, including residential and employment uses, private open space and Infrastructure (e.g., local and Regional streets and stormwater management ponds). The Net Developable Area excludes: a) Environmental features and areas identified in policy 3.6.3, unless such areas have been utilized for associated servicing Infrastructure; b) The Regional Greenlands System and approved local municipal natural heritage systems where Development is prohibited; c) Key Natural Heritage Features and Areas and Key Hydrologic Features and any required buffers; d) Major Infrastructure rights-of way (i.e. existing 400-series highways and finalized route alignments for extensions or future 400-series highways, utility lines, and rail lines); and e) Existing Uses (e.g., cemeteries, estate subdivisions).
Gross Developable Area	Not provided	All lands available for Development for both private and public uses, including residential, and employment uses, private open space and Infrastructure (e.g., local and Regional streets and stormwater management ponds).

3. Urban Design and Built Form

The W7LOG is committed to working with the City to ensure that the Secondary Plan Area develops with high quality design elements and cohesive character that supports the vision of a vibrant, inclusive, accessible and healthy community. In this respect, we generally support the City's proposed urban design policy framework in Draft #5 of the W7SP. We recognize that additional urban design considerations will be appropriately addressed through the City's City Wide Urban Design Guidelines and comprehensively applied through subsequent planning phases.

We also recognize the importance of balancing residents and jobs in Weston 7 to support complete communities, however, we have concerns with the prescriptive nature of policies for Mixed-Use I and Mixed-Use II development and required non-residential Gross Floor Area (**"GFA"**). We are concerned that the requirement for a minimum of 15% or 20% of GFA to be non-residential uses (for Mixed-Use I and Mixed-Use II respectively) would not be feasible under current market conditions, resulting in intensification being stalled.

We propose the following policy change to balance mixed-use objectives with market factors:

3.1 Introduce flexibility in requirement for non-residential GFA in Mixed-Use I and Mixed-Use II designations.

The requirement for non-residential GFA in Mixed-Use I and II designations (policies (5.2.3(b),5.3.3(b), and 5.3.3(c)) cannot be supported by the market, especially without sufficient new residents to support such uses.

It is also notable that the requirement of 15% or 20% non-residential GFA is significantly higher than other areas of the City that are planned for even greater density. For example, the draft VMC Secondary Plan policies introduce a requirement of 10% of non-residential GFA in the Mixed-Use designation, with permission to reduce this amount subject to conditions (policies 9.2.4 and 9.2.5). The Yonge-Steeles Corridor Secondary Plan requires retail along Yonge St. and Steeles Ave. W. but is otherwise flexible in its requirement for non-residential GFA in its High-Rise Mixed-Use designation (Section 3.4). These areas

also benefit from existing or planned subway service, which Weston 7 does not. As such, it is our recommendation that the requirement for non-residential GFA be reduced significantly, and policy be introduced to permit flexibility in the rate to ensure alignment with the development conditions of the area.

Within the Mixed Use II designation, draft policy 5.3.3(c) does not permit dwelling units at grade and a minimum of 75% of ground floor GFA be occupied by non-residential uses. As noted above, we have concerns that this requirement cannot be supported by the market, and the outcome of this policy may also be contrary to its intent, where ground-related non-residential uses cannot be supported by the population. It is our recommendation that the policy language be revised to remove the specific minimum required non-residential gross floor area and instead prioritize policies that activate street frontages within W7.

3.2 Permit standalone residential buildings in Mixed-Use I and Mixed-Use II designations where they do not front onto an Arterial or Major Collector road.

As identified in draft Schedule 1, the majority of lands within Weston 7 are designated either Mixed-Use I or Mixed-Use II, and within these designations, standalone residential development is prohibited (policies 5.2.3(b) and 5.3.3(b)). Requiring that essentially all development in the W7SP include non-residential GFA is not feasible given current market conditions and would not necessarily lead to a quality pedestrian experience for future residents if non-residential GFA is built but remains unoccupied.

To balance the vision for a mixed-use complete community with market factors, we recommend permitting standalone residential buildings in Mixed-Use I and II designations where the buildings do not front Arterial or Major Collector roads. This will ensure a mix of uses are preserved on major roads, while also ensuring that residential growth is supported, which will in turn create a critical mass of residents to sustain non-residential uses.

4. Additional Comments

The LOG has the following additional comments for the City's consideration as it develops the W7 Secondary Plan:

4.1 Ensure Priority Consideration Overlay policy framework prioritizes planning review and approvals for applicable applications, but allocates capacity on a "first come, first served" basis based on development timing.

The W7LOG appreciates the City's recognition of existing planning applications in the W7SP Area through the Priority Consideration Overlay, and we support the policy framework that supports prioritizing review of these applications for approval.

Regarding draft policy 5.6(b), we suggest adding language to clarify that, despite Priority Consideration Overlay status for planning approvals, capacity allocation will ultimately be dependent on timing of construction, on a "first come, first served" basis and where it is demonstrated that sufficient infrastructure is able to support the development being proposed. For example, an applicant may not develop for many years after obtaining planning approvals, and therefore capacity allocation should not be earmarked for such development. We further recommend that this approach to capacity allocation based on development readiness also apply to future planning applications that are not within the Priority Consideration Overlay. In other words, if an application outside of the Priority Consideration Overlay is approved and prepared to begin construction, they should receive capacity allocation ahead of an application within the Priority Consideration Overlay that is not yet ready to start construction.

4.2 Introduce greater flexibility for local road mid-block right-of-way requirements.

Policy 7.1.3(d) introduces a requirement of 23 metres for local roads. This is above the standard requirement, in high-density areas – for example, the draft VMC secondary plan policy permits local roads with a right-of-way of 20-22m. As such, we recommend lowering the standard for local roads to be 20 metres, which represents a more appropriate local road right of way to support growth within the W7SP.

4.3 Work with the W7LOG to refine parkland framework to ensure suitability in a high-density urban community.

We recognize that changes to parks policies in Draft #5 include the removal of Pocket Parks and Promenades, and introduction of Urban Parks and Public Squares. We are seeking clarification on the basis for this change. The W7LOG supported the previous policy direction that smaller parks may be considered eligible parkland contributions, as this was in keeping with the urban, high-density vision for Weston 7. We would appreciate the opportunity to discuss this change with staff and provide further comment on how we can support parkland provision for the benefit of future residents.

We appreciate the work of staff to prepare Draft #5 of the W7SP, and we look forward to continuing to participate in the process of building Weston 7 into a well-designed, engaging, mixed-use complete community. If you have any questions about the comments above, please reach out to the undersigned.

Yours truly, KLM PLANNING PARTNERS INC.

Ryan Mino-Leahan MCIP, RPP Partner

Madison Van West MES, MCIP, RPP Intermediate Planner II

Weston 7 Landowners Group Ownership Map No. **Ownership** Name Common Name Gross Area (ac) CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN Smart 1 19.30 PROPERTY HOLDINGS (ONTARIO) INC. Centres/Choice CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN Smart (5 10.84 2 PROPERTY HOLDINGS (ONTARIO) INC. Centres/Choice N.H.D. DEVELOPMENTS LIMITED Sorbara 4.14 4 HOME DEPOT HOLDINGS INC. 10.02 Home Depot 5 CALLOWAY REIT (400 AND 7) INC. Smart Centres 9.65 14 2 6 167 CHRISLEA ROAD HOLDINGS INC. 3.44 7 **CP REIT ONTARIO PROPERTIES LIMITED** Choice 8.89 13 CALLOWAY REIT (WESTRIDGE) INC.: CANADIAN Smart (12) 8 6.76 PROPERTY HOLDINGS (ONTARIO) INC. Centres/Choice **CANADIAN TIRE PROPERTIES INC Canadian** Tire 8.22 10 0 PEM (WESTON) LIMITED PARTNERSHIP; PEM (WESTON) 0 10 Pemberton 3.65 8 GP INC. 11 MAC'S CONVENIENCE STORES INC. Mac's 0.75 HWY 0 12 4.80 1857307 ONTARIO INC. Liberty 13 CALLOWAY REIT (400 AND 7) INC Smart Centres 5.78 14 CALLOWAY REIT (400 AND 7) INC Smart Centres 4.68 20 15 KINGSMOOR DEVELOPMENTS INC **Trinity Point** 2.82 16 GALLU CONSTRUCTION INC ARG 3.96 (16) 26 17 2.71 Condominium COLOSSUS D 18 MARINO ON 7 INC Marino 1.91 19 Condominium 1.97 28 DEV-WEST PROPERTIES INC 10.05 20 Morguard 21 SUNCOR ENERGY INC. Suncor 1.58 22 2.68 Condominium 23 **RIOTRIN PROPERTIES (VAUGHAN 3) INC.** RioCan 5.57 27 24 1493130 ONTARIO LIMITED RioCan 20.14 Sky Property 25 2.47 2371933 ONTARIO INC. Group 26 RIOTRIN PROPERTIES (VAUGHAN) INC. RioCan 6.09 27 **RIOTRIN PROPERTIES (VAUGHAN2) INC.** 17.29 RioCan 28 COSTCO WHOLESALE CANADA LTD. Costco 13.08 29 1493130 ONTARIO LIMITED RioCan 10.58 **Total Participating Owners** Hwy 407 116.20 Total Non-Participating Owners 82.80 199.00 TOTAL * * Does not include Liberty (Parcel No.12) Job No. Legend DELTA URBAN File No. Weston & 7 Secondary Plan (#) Parcel Number Exempt Owner Description: Weston & 7 Secondary Plan 8800 Dufferin St, Suite 104 Vaughan, Ontario L4K 0C5 Boundary **Ownership Map** Source: Geowarehouse Municipality: Vaughan, Ontario Participating Owner Non-Participating Owner Ν Region of York Date: March 13, 2025

Appendix I: Weston 7 Landowners Group Ownership Map



Scott Snider Professional Corporation Shelley Kaufman 25 Main Street West, Suite 2010 Hamilton Ontario Canada L8P 1H1 Tel: 905 529-3476 <u>ssnider@tmalaw.ca</u> <u>skaufman@tmalaw.ca</u>

January 21, 2025

Via Email to: <u>clerks@vaughan.ca;</u> <u>council@vaughan.ca</u>

City of Vaughan Mayor Del Duca and Members of Council Attn: Todd Coles, City Clerk 2141 Major Mackenzie Drive Vaughan, ON L6A 1T1

Attention: Mayor Steven Del Duca and Members of City of Vaughan Council

Re: Weston 7 Secondary Plan City of Vaughan Weston 7 Landowners Group Our File No. 13729

We are counsel to the Weston 7 Landowners Group (the "W7LOG"). The W7LOG formed in January of 2024 at the request of the City of Vaughan ("City") to help coordinate input on the Weston 7 Secondary Plan ("W7SP" or "Secondary Plan") process. The W7LOG includes the following individual landowners representing approximately 88% of the W7SP area (175.87 of 199 acres): **(Ownership Map attached)**

- 1493130 Ontario Limited,
- 2371933 Ontario Inc.,
- Dev-West Properties Inc.,
- Calloway Reit (400 and 7) Inc.,
- Calloway Reit (Westridge) Inc.,
- Canadian Property Holdings (Ontario) Inc.,
- Canadian Tire Properties Inc.,
- Costco Wholesale Canada Ltd.,
- CP REIT Ontario Properties Limited,
- Gallu Construction Inc.,
- Kingsmoor Developments Inc.,
- Marino ON 7 Inc.,
- Pem (Weston) Limited Partnership,

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- Pem (Weston) GP Inc.,
- RioCan Real Estate Inv Trust,
- Riotrin Properties (Vaughan 3) Inc.,
- Sky Property Group Inc.,
- N.H.D. Developments Limited (formerly Wedgewood Columbus Limited)¹

The W7LOG (on behalf of its constituent members) is writing to Council directly to ensure its voice is heard by the representatives who ultimately determine the direction of this Secondary Plan. Our client is very motivated and dedicated to collaborating with the City on the Secondary Plan. It is concerned that Council may be hearing a rhetoric inconsistent with its dedication. The W7LOG does not expect to have all its input incorporated. The group knows this is an iterative process with various stakeholders. The W7LOG has worked hard to narrow the focus of its concerns. Our client is willing to continue to do the work that is necessary to address Council's concerns.

W7LOG's Request

To that end, the W7LOG has one specific request at this time: that Council defer any further consideration of the Secondary Plan until the group has submitted its traffic review to address the draft Weston 7 Transportation Master Plan (2024) ("TMP"). It is clear that the transportation challenges identified in the TMP are the critical issues affecting Council's approach to central assumptions in the Secondary Plan. Council should hear from the landowners directly affected by those assumptions before making any final policy decisions. It is not enough to suggest that these policies can be re-visited at some future date. Such an approach would be neither fair nor offer the possibility of a timely resolution of these issues. Planning policy must always be based on the best information and analysis. Our client wishes to engage those issues as part of the current secondary plan approval process.

Discussion

Since its formation, the W7LOG has undertaken a continued effort to engage with the City to provide input into the Secondary Plan through both the group's representatives at Delta Urban Inc., the group's and the constituent members' planning, transportation engineering and civil engineering consultants, as well as individual landowner representatives. Such engagement includes written correspondence, with W7SP redlined comments, making oral submissions before the Committee of the Whole ("COW") and attending Public Information Consultation ("PIC") meetings. The group has met numerous times with City staff and its consultants and corresponded regarding updates, requests for information and access to data. Individual landowners have been involved in the W7SP process since as early as 2012.

¹ Nothing in this correspondence derogates, or is intended to derogate, from the position taken by Wedgewood Columbus Limited in the ongoing OLT proceeding File No. OLT-22-004652.

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The W7LOG appreciates the time the City has taken to engage with the group and its representatives. However, this process has been frustrated by the apparent unwillingness, or lack of direction by the City, to provide timely and substantive feedback to the W7LOG or to engage in meaningful back and forth discussions to land at final policies. In fact, draft #4 of the W7SP was released on November 21, 2024, without any advance notice despite our client actively requesting that the City advise when a revised draft would be released. We understand that subject to one memo from the outside consultant to the City's senior planner copied to our client in May, there have been essentially no written responses to the input provided and no red-lined revisions to subsequent draft plans or reports to explain the revisions. The W7LOG expects to receive formal responses to the letters submitted to the City and a redlined version of Draft #4 which would facilitate an easier comparison to earlier drafts, as has been and continues to be the City's typical practice regarding both Secondary Plan and Official Plan Review processes. We understand responses to data requests dating back to February of 2024 have not been timely. While some information was provided in August, there are still outstanding requests that need to be addressed.

The Weston 7 experience directly contrasts with previous experience landowners in the group have had working collaboratively with the City. Our client is at a loss to understand why the City asked that they form a group to provide coordinated landowner input, when there appears to be so little interest in true collaboration. Significant time and costs have been dedicated to this by the landowners and their consultants. The W7LOG wants to work with the City to provide steady long term planned growth for the W7SP area.

Draft #4 made fundamental changes to the W7SP by removing detailed references to long-term planning and restricting development to the Growth Threshold identified in the draft TMP of 26,000 people and jobs from the overall build out in draft #3 of 54,500 people and jobs. Also maintained was an Official Plan Amendment ("OPA") requirement which would now apply for any increase to these reduced numbers. We are advised that this occurred despite active discussions about the potential for an even higher people and jobs threshold than 54,500. To be clear, this discussion was about a number that was lower than the threshold our client believes is appropriate, but one which the W7LOG could work with as a compromise. Furthermore, we understand that the City suggested the next draft would reflect increased growth numbers at the October 2024 PICs. As a result, the W7LOG was particularly surprised to see the 54,500 people and jobs number substantially reduced.

The W7LOG understands the need for alternative analysis to support the development ambitions of the landowners and has been willing to prepare additional study to address servicing and transportation capacity issues. However, efforts to collaboratively study and discuss these issues have been impacted by the lack of data from the City or the Region. With regards to servicing, data requests for the City's servicing model date back to March of 2024. The requested data was never provided and an MOU for the Sanitary and Water Supply models remains incomplete since November of 2024. With regards to transportation, the transportation consultants working on behalf of the W7LOG highlighted potential issues with the City's approach to transportation modelling. The W7LOG is reviewing the transportation model, but

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such work is costly and time-consuming. Our client has requested assurance that the alternative analysis will be duly considered by staff. Our request that further consideration of the Secondary Plan be deferred until that work is completed is consistent with a truly collaborative planning process that is based on the best information and analysis.

The City acknowledges that the Secondary Plan area will be built out and grow over a long period of time, yet the proposed Growth Threshold is only to 2041. It is our client's opinion that long-term planning is the proper approach to take in the final W7SP to ensure it extends to the life of its build out. The W7SP area is in a Primary Centre in the Vaughan Official Plan and it includes two PMTSAs. It is intended to be planned for intensification. Proper vision and long-term planning in this location should not be limited by overly prescriptive policies requiring limits on growth or an OPA requirement to increase any growth threshold. The Plan should include the possibility for such growth where infrastructure or servicing capacity concerns are addressed, which the W7LOG has consistently requested in its comments to Staff, but which Staff has not supported.

In addition to these fundamental growth threshold issues, the W7LOG and its constituent landowners continue to have concerns with other aspects of the proposed plan, including:

- *Merit-Based Allocation* The merit-based allocation program contains ambiguities that are fundamentally at odds with an allocation program whereby the delivery of specific infrastructure is tied to specific density permissions. The proposed additional layer of servicing capacity allocation beyond meeting the tests of good planning is not appropriate for a Secondary Plan document.
- *Gross vs. Net Density Calculation* The current density calculation methodology in the Secondary Plan may create more issues related to conflict and resistance to providing public benefits as they are calculated net of said public benefits i.e. POPS, parkland, and roads. A gross density definition can help make the development process run in a smoother, less litigious way, that avoids these issues.
- Non-Residential Requirements Requiring 15% & 20% of total GFA and 75% of ground floor GFA to be non-residential and requiring non-residential uses at grade along all Enhanced Urban Streetscapes results in too large of a non-residential space within a mixed-use area and can lead to empty non-residential spaces that detract from the vibrancy and viability of the area. Where blocks are planned comprehensively, a mixed-use neighbourhood can still be achieved where standalone residential and non-residential buildings can be delivered adjacent to one another.

Ultimately our client is seeking a plan that ensures the long term build out of the Secondary Plan area. The W7SP area should not be kept under the equivalent of a development freeze. The Weston 7 Secondary Plan area needs the opportunity to grow. This is clearly aligned with the Provincial mandate to build more housing faster. Our client has been ready and willing to work collaboratively with the City throughout this process.

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Again, we respectfully request that Council defer further consideration of the Secondary Plan until it has received our client's traffic review of the TMP which is central to the current draft. This will demonstrate that Council is serious about not only making the best policy choices, but also engaging with the W7LOG in a truly collaborative planning process.

Yours truly,

Scott Snider

Yours truly,

Maulma

Shelley Kaufman

Sk:ss:nd Att'd. 13729/3

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Weston 7 Landowners Group Ownership Map

Ownership Name	Common Name	Gross Area (ac)
AY REIT (WESTRIDGE) INC.; CANADIAN PERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	19.30
AY REIT (WESTRIDGE) INC.; CANADIAN PERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	10.84
I.H.D. DEVELOPMENTS LIMITED	Sorbara	4.14
HOME DEPOT HOLDINGS INC.	Home Depot	10.02
ALLOWAY REIT (400 AND 7) INC.	Smart Centres	9.65
CHRISLEA ROAD HOLDINGS INC.		3.44
EIT ONTARIO PROPERTIES LIMITED	Choice	8.89
AY REIT (WESTRIDGE) INC.; CANADIAN PERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	6.76
ANADIAN TIRE PROPERTIES INC.	Canadian Tire	8.22
N) LIMITED PARTNERSHIP; PEM (WESTON) GP INC.	Pemberton	3.65
AC'S CONVENIENCE STORES INC.	Mac's	0.75
1857307 ONTARIO INC.	Liberty	4.80
ALLOWAY REIT (400 AND 7) INC.	Smart Centres	5.78
ALLOWAY REIT (400 AND 7) INC.	Smart Centres	4.68
NGSMOOR DEVELOPMENTS INC.	Trinity Point	2.82
GALLU CONSTRUCTION INC.	ARG	3.96
Condominium		2.71
MARINO ON 7 INC.	Marino	1.91
Condominium		1.97
DEV-WEST PROPERTIES INC.	Morguard	10.05
SUNCOR ENERGY INC.	Suncor	1.58
Condominium		2.68
RIN PROPERTIES (VAUGHAN 3) INC.	RioCan	5.57
1493130 ONTARIO LIMITED	RioCan	20.14
2371933 ONTARIO INC.	Sky Property Group	2.47
RIN PROPERTIES (VAUGHAN) INC.	RioCan	6.09
RIN PROPERTIES (VAUGHAN2) INC.	RioCan	17.29
STCO WHOLESALE CANADA LTD.	Costco	13.08
1493130 ONTARIO LIMITED	RioCan	10.58
Total Participating Owners		175.87
Total Non-Participating Owners		23.14

TOTA	*



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199.00

Source: Geowarehouse

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