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Communication
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Committee of the Whole City of Vaughan 2141 Major Mackenzie Drive Vaughan, Ontario L6B 1T1 Canada



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Date: May 30, 2025

Subject: Comments on the May 2025 City of Vaughan Draft Official Plan

Dear Members of the Committee of the Whole.

Arcadis Professional Services (Canada) Inc. ("Arcadis") has prepared the following comments on behalf of 2748355 Canada Inc. ("274") with respect to Vaughan's Draft Official Plan Review (OPR). 274 and its various partnerships own approximately 31 hectares of land within the Southwest Quadrant of the VMC. As part of 274's efforts as a landowner and stakeholder, 274 and Arcadis have met with City Staff, its consultants, and relevant commenting agencies to provide input as it relates to policy and schedule updates associated with the draft Official Plan.

Arcadis has been monitoring the City of Vaughan's Official Plan Review process and the recently released May 2025 draft schedules and policies of the Official Plan. The following letter reflects our comments as it relates to the potential impacts of the Official Plan policies to 274's landholdings.

It is noted that a previous letter prepared by Arcadis dated July 30, 2024 was submitted to City Staff in response to an earlier draft of the Vaughan Official Plan and should be read in conjunction with this letter. Overall, the most significant comment is that the policies within this City-wide document are often very prescriptive and often fail to take into appropriate consideration of the unique nature of the City's Downtown, the Vaughan Metropolitan Centre. While the VMC does have a separate secondary plan to govern its redevelopment, guidance comes from the City-wide Official Plan, and these policies are often too restrictive and will limit the ability of the City to achieve its goals within this important centre.

Policy Changes of Key Interest

Housing Options

Section 4.1 of the draft Official Plan includes policies pertaining to housing affordability, tenure targets, unit mix and potential implementation of inclusionary zoning that may go well beyond any the legislative framework. Given there is emerging provincial guidance and severity of the housing crisis we submit that, Section 4.1 should be revisited to remove compulsory language stipulating specific affordability, tenure and unit mix targets and provide flexibility to respond to the housing market.

Retail

Policy Section 4.2.4 regarding retail development and redevelopment should include an exemption for the entirety of the VMCSP area and have it defer to the Secondary Plan for guidance. Specifically, there is concern that language around mixed-use development is far too restrictive given the magnitude, scale and phasing of the VMC development. To require commercial impact studies to redevelop existing retail within the VMC is an example of how to discourage and delay the redevelopment of this important City Centre.

Site Design and Building Types

The use of the word "shall" within such a broad reaching policy document as it relates to urban design and building design policies (Section 4.3) is problematic as many parts of the City have much different characteristics and urban fabric. A broader, more flexible policy regime that once again defers to Secondary Plan policies is a more appropriate approach.

Specifically, the majority of Section 4.3.3 as it relates to the detailed and restrictive policies governing more dense forms of development (Townhouses, Mid and High Rise residential) limit the creative options within a key redevelopment area such as the VMC. The detailed nature of these polices create a unified design result that may be appropriate for minor redevelopment sites but would result in a potentially boring, repetitive and uninteresting urban fabric if applied across such a large area as the VMC. As it stands now, without recognizing the VMC as a unique area of redevelopment, many of the policies within Section 4.3 (especially ones that use "shall") would be problematic and inappropriate in their application or guidance for development within the City's downtown.

Park and Open Space

The policies within Section 4.4 need sufficient flexibility to permit the provision of park and open space in potentially difficult urban redevelopment areas. The need for non-traditional park and open space policies within challenging Major Centres such as the VMC, is the key to providing these important community assets on a timely basis while maximizing public and private investment. As the policy is written, within secondary plan areas, the "more restrictive" policies between the two documents would apply. This is an inappropriate application of City-wide park standards and design criteria to unique planning areas, such as the VMC. Finally, the policies within Section 4.4 need to implement the intent of the recent changes at the provincial level regarding parkland dedication.

Conclusion

Overall, Arcadis and 2748355 Canada Inc. acknowledge the substantial reduction of repetitive policies within the May 2025 draft compared to earlier versions. However, the draft policies still contain many specific and prescriptive policies that are not suitable in such a broad reaching policy document.

2748355 Canada Inc. looks forward to the opportunity to refine the draft policies of the Vaughan Official Plan, and work collaboratively with the City and all other relevant agencies, stakeholders, and the public with regards to these policies and permissions.

Please do not hesitate to contact the undersigned should you require clarification or additional information.

Sincerely,

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