

**C61.**

**Communication**

**CW(PM) – June 4, 2025**

**Item No. 10**



Committee of the Whole (c/o Office of the City Clerk)  
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Date: May 27, 2025

Subject: **Committee of the Whole – VMC Secondary Plan Draft Policy Comments**

Dear Members of the Committee of the Whole:

Arcadis Professional Services (Canada) Inc. ("Arcadis") is writing this letter on behalf of 2748355 Canada Inc. ("274") for their landholdings within the Vaughan Metropolitan Centre (VMC), in response to the draft policy and schedules presented to the VMC Sub-Committee on Wednesday on May 21<sup>st</sup>, 2025, as part of the ongoing VMC Secondary Plan (VMCSP) update.

274 and its various partnerships is the single largest landowner within the southwest quadrant of the VMC and has been working with the City on the development and redevelopment of these lands for the past 20+ years. Over this time period, 274 worked extensively with the City in the drafting of the original VMCSP 2010 and ultimately, it's implementation of over 6,830 residential units and 141,000 sq.ft. of retail either delivered, in construction or approved for development to date, with approximately 13.5 net hectares of land still remaining to be developed within the Assembly Park Master Plan.

From the outset, 274 prepared the Assembly Park Master Plan to capture the general intent and essence of the City's vision for the VMC. The Assembly Park Master Plan introduced key elements such as a defined retail strategy, a variety of housing types, a comprehensive and extensive park and open space system and critical community elements such as schools and a key civic space opportunity.

As part VMCSP update process, 274 and Arcadis have met with City Staff, its Consultants, and relevant commenting agencies to provide input as it relates to supporting studies and the draft VMCSP schedule changes.

Previous letters dated October 2<sup>nd</sup>, 2023, January 31<sup>st</sup> and February 27<sup>th</sup>, 2024, and March 7<sup>th</sup>, 2025 were submitted to City Staff in response to the various progress updates of the draft VMC Secondary Plan Update and should be read in conjunction with this letter.

Until this month, the policies that provide the substance to the previous schedule releases have not been provided, so the previous comments in the aforementioned letters were contingent on the eventual policy framework, and as such were preliminary in nature. The release of the draft policy now forms a complete draft of the 2025 VMCSP, and in review, we continue to have significant concerns with the totality of the document.

Throughout the drafting and subsequent approval of the VMCSP 2010, the core issue of the schedules and policies was that they were too prescriptive and provided very little latitude to adjust to changes in higher level policy framework and to market conditions. Ultimately, since its approval in 2015, these concerns have continued to bare out with seemingly every development application within the VMC requiring some form of OPA on a site-specific basis. Our initial review of the draft schedules and policies recently released seem to suggest that the policy framework continues to be overly prescriptive and, in some cases, contrary to the policy direction of the

Province. The use of “shall”, “must”, and “will” throughout the majority of the document provides very little flexibility, and in many cases without legislative authority. Summarized below are some of our key issues.

## Objectives

Section 3.0 of the draft VM CSP is intended to identify the objectives of the policy document, laying the framework for what the document seeks to achieve over its lifecycle. Throughout the section, the supporting language associated with the principles are largely based on observation or opinion, and are vague, without clear criteria on how these objectives should be measured or met.

## Growth Management

Section 4.0 once again includes a significant amount of language that is based on observation or opinion, setting arbitrary limits on development proceeding without identifying any path forward to “unlock” development lands. Specifically, language has been added to expand the use of Holding Provisions that provide arbitrary criteria that is open-ended and restrictive.

## Streets and Transportation

The Streets and Transportation policies in Section 5.0 and associated schedules tie much of the policy framework back to the VMC TMP, which remains ongoing and is not yet approved. As such, any commenting on Section 5.0 seems premature due to the inclusion of text pointing the reader to review the VMC TMP.

Notwithstanding, the policies are overly restrictive and do not include flexibility to reflect realities on the ground. The ultimate phasing that is also a reality runs contrary to other policies within the Plan, or the general intent of the vision. A number of elements of the policy direction which require flexibility are summarized below:

- Block access locations.
- ROW widths and cross section design.
- Parking underneath parkland or mews.
- Provision for a VMC-wide active transportation/pedestrian circuit
- Ability to delete mews and local streets without amendment to this Plan
- Removal of both Parking Minimums and Maximums to permit a response to market demand.

## Energy, Water and the Natural Environment

The policies within Section 6.0 should be reviewed in the context of the Ontario Building Code minimum requirements and recently released Provincial direction on these matters. Overall, the language in this Section is overly restrictive, and may contradict the recently introduced draft Provincial legislation.

## Parks and Open Spaces

As with much of the document, many of the policies contained in Section 7.0 and its corresponding schedules are too restrictive, provide almost no flexibility in the provision of a dynamic park and open space system and in many cases, seem to again be contrary to Provincial policy and authorities within the *Planning Act*. There are significant concerns related to the parkland dedication, the park types and design standards, park restrictions and

encumbrances, interim uses, privately owned public spaces, and the open space and mews policies within the draft.

It is recognized that the overall success of the VMC will be tied to the ultimate delivery of a park and open space system that supports the existing and future residents and visitors of the VMC. The policy framework should be flexible enough to deliver this needed community element without being so restrictive that it may ultimately remove the ability to meet the overall intent.

## **Community Services, Cultural Facilities and Public Art**

At present, Section 8.0 and the corresponding schedules require modifications to reflect the discussions to date with the City related to the Performing Arts and Cultural Centre and should provide the relocation of Community Services and Cultural Facilities without amendment to this Plan.

Further, as mentioned in previous letters, the built form of the potential school site denoted as “S3” in the southwest quadrant should reflect its context as supplementary to the two planned schools that are being considered by both the York Catholic District School Board and the York District School Board, immediately south of the proposed S3 site. As such, the draft VM CSP should include language in Policy 8.2.6 specifying that the S3 school is to be constructed in an urban format, such as a podium school with no minimum land requirement.

## **Land Use, Density and Built Form**

### **Height and Density**

Notwithstanding the stated desire to remove height and density limitations to provide flexibility to respond to the market and provide variety in built form, many of the policies within the Plan speak to elements that ultimately will limit height and density, and is contrary to the stated intent.

### **Mixed Use/Retail**

Section 9.0 includes policies related to the *Mixed Use* land designation that, again, are very restrictive and contrary to other policy goals and intentions. Specifically, policies related to minimum non-residential requirements, design requirements and the mandating of retail scattered across the Plan fails to recognize existing retail approvals and market conditions.

### **Housing**

The draft language includes many definitive policies related to residential unit mix, affordability, and tenure, all of which have no legislative framework. This entire section should be reconsidered within the question of what is aspirational versus what is being mandated.

### **Built Form & Parking and Servicing Facilities**

The proposed Built Form and Urban policy direction within the draft policies is overly restrictive, redundant, and do not belong in a Secondary Plan. Further, the policies continually refer to and direct the reader to the VMC Urban Design Guidelines as the defining document. This use of policy to strengthen the Guidelines is inappropriate and seemingly contradicts the policy which specifically states that the Urban Guidelines are not intended to be used as policy.

What the past 10 years has demonstrated within the VMC is the need for flexibility in built form and urban design policies to reflect the changing market conditions, phasing realities, and on the ground conditions. The use of Official Plan policies to dictate uniformity of built form and urban design direction limits creativity, removes the ability to provide variations in built form, and results in a repetitive urban fabric.

The entirety of this Section should be revisited.

## Conclusion

Overall, a significant amount of the language in the draft VMCSPP is overly prescriptive, arbitrary, intended to restrict development, limit creativity, and above all else, fails to reflect much of the work that has either been developed, approved or master planned to date. What has been demonstrated to date is that the VMC has been successful notwithstanding a strict policy language contained in the original VMCSPP 2010. It is strongly encouraged that the policy framework contained within the draft be revisited to provide flexibility for the VMC to continue to develop over time and respond to emerging market demands. The draft language as it stands is simply too restrictive and, in many cases, contradictory to itself.

2748355 Canada Inc. looks forward to the opportunity to refine the draft schedules and policies of the proposed VMC Secondary Plan and work collaboratively with the City of Vaughan, Region of York, and all other relevant agencies, stakeholders, and the public. Given the extent of the concerns with the language as drafted it may be successful to undertake a detailed workshop that conduct a policy-by-policy review.

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

Sincerely,

**Arcadis Professional Services (Canada) Inc.**

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