

**C122.****Communication****CW(PM) – June 4, 2025****Item No. 10**

June 3, 2025

Fausto Filipetto, RPP, MCIP  
 Project Manager  
 Official Plan Review  
 City of Vaughan  
 2141 Major Mackenzie Drive  
 Vaughan, ON  
 L6A 1T1

*Via email: [oprmanager@vaughan.ca](mailto:oprmanager@vaughan.ca)*

Dear Mr. Filipetto:

**RE: COMMENT LETTER  
 NEW DRAFT VAUGHAN OFFICIAL PLAN, MAY 2025  
 255 BASS PRO MILLS DRIVE  
 OUR FILE Y5122AH**

MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") is retained by SunLife Assurance Co. of Canada ("Sun Life"), the registered property owner of the lands located at 255 Bass Pro Mills Drive in the City of Vaughan (the "Subject Lands") to provide comments on the latest Draft City of Vaughan Official Plan ("Draft VOP"), released by the City on May 15, 2025.

### **Background**

On October 20, 2023, applications for an Official Plan Amendment ("OPA"), Zoning By-law Amendment ("ZBA"), and Draft Plan of Subdivision ("DPS") were submitted to the City of Vaughan for the Subject Lands. The proposed OPA, ZBA, and DPS, will enable the comprehensive redevelopment of the Subject Lands from the existing retail plaza into a complete, mixed use, transit-supportive, and walkable community that integrates within the evolving surrounding context of the Vaughan Mills Centre Secondary Plan area. The applications were all deemed complete on November 23, 2023.

BentallGreenOak (BGO) c/o Sun Life previously submitted a comment letter, appended hereto, on September 27, 2023, pertaining to the past Draft Official Plan (Part A) process. We understand that following this letter, the Official Plan Review project workplan was revised to consolidate the work on Part A (conformity amendment) with the Part B work (additional supplementary policies) into a single process and a single Draft OPA, which was released on June 18, 2024. BentallGreenOak (BGO) c/o Sun Life submitted a comment letter, appended hereto, on Draft #1 of the Comprehensive OPA for the Vaughan Official Plan ("Draft #1 of the OPA")

on July 31, 2024. Following this, the City released an updated version of the Draft VOP in January 2025, to which BentallGreenOak (BGO) c/o Sun Life submitted a comment letter, appended hereto, on March 4th, 2025.

On May 15, 2025, the City of Vaughan released a new Draft VOP, that will be presented at a Public Meeting on June 4, 2025. We have completed our review of the Draft VOP 2025 and appreciate that the City has incorporated several of our previous comments, particularly the delineation of "Strategic Growth Areas" on Schedule 1- Urban Structure, as well as the simplified language used in several policy sections. The following letter outlines our remaining comments on the May 2025 Draft VOP, which we hope the City will consider addressing in the next iteration of the plan.

## **Outstanding Comments**

### **Primary Centre**

In the Draft VOP released in January 2025, a side textbox of the Primary Centres section of the Draft VOP 2025, described Vaughan Mills (together with Bathurst Street & Centre Street and Weston Road & Highway 7) as a shopping destination of regional significance that holds potential for residential intensification and the creation of additional uses through the redevelopment of surface parking areas, outparcels and the eventual redevelopment or intensification of the existing shopping mall.

We had previously commented that the above noted language should be incorporated into the policy framework of the Draft VOP 2025, to encourage the future redevelopment of underutilized retail plazas and surface parking lots that is consistent with Policy 2.2.1(b) of the Provincial Planning Statement. In the latest version of the Draft VOP from May 2025, this policy has been removed all-together. We request that this language be reinstated as a policy in the main text of Section 2.4.3, Primary Centres of the Draft VOP. Incorporating this language into the policies of the Draft VOP 2025 will support residential intensification of underutilized lands that will contribute towards the City's housing targets and the creation of a complete community.

### **Parking**

Policy 4.3.3.22 of the Draft VOP states that the City will reduce parking requirements, where feasible, through establishing context-sensitive parking requirements that respond to diverse settings, including SGAs. Policy 4.3.3.30 of the Draft VOP then states that the City will consider eliminating vehicular parking requirements for multi-unit developments within SGAs that do not overlap with a Protected Major Transit Station Area. These policies are contradictory, as one states that the City will reduce parking requirements in SGAs, while the next states that the City will consider eliminating parking requirements. While allowing a reduction in parking requirements in SGAs is positive, this policy should be revised to be consistent with Section 16(22) of the *Planning Act* which removed parking minimums in "*PMTSAs and areas delineated in the official plan of the municipality surrounding and including an existing or planned higher order transit station or stop*". Vaughan's SGAs including, the Vaughan Mills Primary Centre and future MTSA, would meet the criteria set out in Section 16(22) of the *Planning Act* as areas without parking minimums. Therefore, Policy 4.3.3.22 and 4.3.3.30 should be removed in order to be consistent with Section 16(22) of the *Planning Act*, and to stimulate housing

development in Vaughan without the need to provide CIL for parking reductions. A new policy should instead be added which states that lands within PMTSAs and lands surrounding either an existing or planned higher order transit station or stop are exempt from minimum parking requirements.

## **Site Design & Building Types**

Section 4.3.3.17 of the Draft VOP consists of policies that guide site design and building types in the City of Vaughan, including the design of redevelopments located in SGAs. Specific built form and design policies are provided for the development of mid-rise and high-rise buildings in SGAs, including the following related to parking:

- Surface parking is not permitted between the building's front or side and a public street (Policy 4.3.3.17(a)); and,
- Surface parking elsewhere on the lot will be setback from any property line by a minimum of 3.0 metres and shall be appropriately screened through landscaping (Policy 4.3.3.17(b)).

We request further clarification of these two policies to confirm if "surface parking" includes layby lanes and passenger pick-up and drop-off (PPUDO) areas. We would recommend that language be added to explicitly exempt layby lanes and PPUDOs from these policies. The metric setback of 3.0 metres should also be provided in the implementing zoning or through design guidance and not in an Official Plan policy. Placing such regulations into policy creates a situation where an Official Plan Amendment would be required for a contextually appropriate reduction which, is highly inappropriate.

Design policies and criteria are also provided for the development of high-rise buildings. In an effort to ensure appropriate privacy, minimize shadowing, and maintain consistent urban design criteria has been provided that ensures the creation of slender, and appropriately spaced high-rise buildings as follows:

- The base of the buildings cannot be longer than 80 metres in length (Policy 4.3.3.14(a));
- The floorplate of the building, measured as the total area contained within the exterior face of a building, excluding balconies, for storeys above the podium generally shall be no greater than 750 square metres, except for High-Rise Buildings containing office uses above the twelfth storey (Policy 4.3.3.14(b)); and,
- The portions of a high-rise building above 12 storeys, shall be setback a minimum of 12.5 metres from any side or rear property line (Policy 4.3.3.14(c)).
- Where more than one high-rise building is located on the same lot, the distance between any portions of the high-rise buildings above twelve storeys shall generally be at least 25 metres (Policy 4.3.3.14(d)).

Urban design direction should not be mandated in policy that obligates the design of buildings to specific standards that limit the uniqueness of context, site design, and built form. Urban Design Guidelines should be used as guidelines that create a general direction for built form. The numerical standards outlined in Policy 4.3.3.14 should be removed, and instead, the Draft VOP 2025 should provide broader objectives and guidance for urban design that allows for greater flexibility and individuality in building design. In particular, increased flexibility should be provided to allow for building floorplate sizes that exceed 750 m<sup>2</sup>, to accommodate increased building heights in growth areas. The Draft VOP reiterates the importance of making efficient use of underutilized sites in SGAs through intensification and growth but includes restrictive design policies that limit

the ability for creating vibrant, mixed-use communities, with a unique sense of place. We encourage that the policies of Section 4.3.3 as identified above be implemented as guidelines, rather than as mandatory prescribed policy.

## **Built Form**

Policy 4.3.3.12 of the Draft VOP 2025 states that the separation distance between the tower portion of high-rise buildings will be a minimum of 25 metres. This policy was also included in the previous version of the Draft VOP from January 2025. Later in the Draft VOP, Policy 4.3.3.14 (d) states that the distance between any portion of a high-rise building above the 12<sup>th</sup> storey shall generally be at least 25.0 metres. These policies should be consolidated into one, and clarity should be provided on whether the 25.0 metre tower separation applies to any storey above the podium or to any storey above the 12<sup>th</sup> storey. As stated previously, incorporating tower separation distances into Official Plan policy as prescriptive requirements can constrain the intent of Official Plans that provide general guidelines and flexibility to support growth and intensification in SGAs.

## **Future MTSA**

The Region of York Official Plan (now part of the City of Vaughan Official Plan) identified a Future MTSA ("Future MTSA 77, Vaughan Mills BRT Station") at the intersection of Rutherford Road and Jane Street which, the City of Vaughan has illustrated on Schedule 1B- Strategic Growth Areas of the Draft VOP 2025. As per the Region's preliminary mapping for Future MTSA 77, the Subject Lands lie immediately west of the boundary for the Future MTSA. According to Policy 2.4.6.14 of the Draft VOP 2025, the location of Future MTSA as shown on Schedule 1B are considered preliminary and general, with final boundaries to be determined once there is a financial commitment for the construction of the higher-order transit infrastructure.

We understand that the City will conduct further studies and assessments to finalize the delineation of Future MTSA 77, based on the Region's proposed boundaries and funding commitments for transit infrastructure. Given the proximity of the Subject Lands to the Region's preliminary delineation of Future MTSA 77 and their location within a designated SGA identified as a "Primary Centre", we request that the Subject Lands be included in studies and evaluations for the Future MTSA 77. BGO is actively interested in participating in the study of Future MTSA 77 and would appreciate if the City can confirm the estimated timeline and process for advancing the study and planning of Future MTSA 77. In particular, given the potential for transit-supportive growth on the Subject Lands, BGO would support the consideration of Future MTSA 77 as a PMTSA and would like to be included in any discussions on the potential for Future MTSA 77 to be designated as a PMTSA.

## **Sustainability**

Policy 4.6.2.1 of the Draft VOP 2025 states that development applications for Plans of Subdivision and major Site Plans are subject to the City's Sustainability Metrics Program and must meet a silver threshold if they are in an SGA.

Given that one of the objectives of the Draft VOP is to encourage the development of new Purpose-Built Rental (PBR) and affordable housing, it's important to recognize that mandating enhanced sustainability requirements can significantly impact project feasibility. These additional requirements can erode a project's ability to deliver other critical social benefits, such as affordable and attainable housing units. To strike a balance between sustainability and affordability, we recommend reverting to a baseline (e.g., bronze level) for sustainability requirements in SGAs. This approach will help ensure that vital new housing supply—particularly PBR and affordable/attainable housing—can be delivered efficiently and sustainably, without compromising affordability or project viability.

## **Parkland**

### ***Strata Parks***

Policy 4.4.2.4(b) states that where a Strata Park is conveyed to the City no private infrastructure shall be permitted beneath the park including, private stormwater management infrastructure, private water or wastewater infrastructure, electrical infrastructure, telecommunication equipment, loading areas, waste storage, service corridors, commercial storage areas, or any other utilities or infrastructure not directly servicing the parks operations and maintenance, with the exception of parking stalls. It would be helpful for the City to provide clarity as to why private infrastructure cannot be located beneath Strata Parks, as these parks are intended to increase public parkland through the use of encumbrances through stratified ownership arrangements. It would also be beneficial to clarify that all infrastructure required for parking including, plumbing, electrical, and HVAC, is permitted under Strata Parks.

### ***Privately Owned Public Spaces (POPS)***

Policy 4.4.3.1 of the Draft VOP 2025, categorizes Privately Owned Public Spaces ("POPS"), as an "Open Space Typology" that while owned and maintained by private entities are open for public use and is over and above parkland dedication. Policy 4.5.5.8 then states that POPS may be eligible for parkland dedication credit towards the parkland dedication requirements for a development, subject to the requirements of Section 4.4.3.2 and 4.4.4.8. These policies are contradictory in nature, as Policy 4.4.3.1 states that POPS are over and above parkland dedication whereas Policy 4.5.5.8, states that POPS may be eligible towards parkland dedication. These policies need to be simplified and present an aligned policy on if and how POPS may be used for parkland dedication.

Policy 4.4.4.8(iii) states that POPS must have a minimum of 50% perimeter public frontage, with at least half of that frontage located on a public street. The remaining frontage may consist of any combination of public realm elements, POPS, or privately owned, publicly accessible streets or mews. Clarification is required to understand the rationale for why strict design requirements and public road requirements are provided in Official Plan policy, particularly given that POPS are intended to be encouraged by the City. Additionally, the design of POPS is expected to be guided by the City's forthcoming POPS Study, which will establish more detailed and context-sensitive design standards. The policy requirements of POPS in the Draft VOP should be more flexible and defer to the design guidelines in the POPS Study that presents a comprehensive vision for the development of POPS.

## ***Parkland Dedication***

As per Policy 4.4.5.2 parkland conveyance for residential development is calculated as a percent of the net developable area of a site. In Policy 4.4.5.4 the cap for parkland contributions for residential or mixed-use development is calculated as a percent of the gross developable area. Clarification should be provided by the City as to why net developable area is used to calculate parkland contributions, but gross development area is used to determine the cap of parkland dedication that may be requested. Calculating the cap for parkland contributions as a percent of gross development area increases the cap for the land area that the City may require for parkland contribution, then what would be required if the cap was taken as a percent of net developable area. This does not take into account how the developable area of a site can be constrained by road widenings, natural heritage areas, or other lands that must be dedicated to the City or the Region.

## **Special Study Corridor**

The portion of Jane Street located immediately east of the Subject Lands is identified as a “Special Study Corridor” on Schedule 10- Major Transit Network. However, the Draft VOP does not include any policies that define what a “Special Study Corridor” is, or outline if and how the City intends to study or plan for these corridors.

It would be helpful to provide further policy direction to clarify the purpose of Special Study Corridors. This would allow landowners to better understand how these designations may impact future development, and how they can support the City in planning for these areas. Additionally, while reference is made to footnote 1 on the Schedule, the actual footnote does not appear to be provided.

## **Bass Pro Mills Drive**

As per Schedule 9A- Street Classifications of the Draft VOP, the extension of Bass Pro Mills Drive on the west side of Highway 400 is identified as a “Proposed, Employment, Major Collector Road (30 m).” However, at the City of Vaughan Committee of the Whole Meeting on Wednesday, April 2, 2025, the City approved the construction of this road extension as part of the 2025 budget. Accordingly, the Draft VOP 2025 should be updated to reflect this change and identify the extension of Bass Pro Mills Drive as an “approved” roadway, rather than a “proposed” one.

## **Complete Application Requirements**

Policy 5.4.2.3 states that the City may deem application materials incomplete if the quality of the submission does not meet the standards set out in the applicable Terms of Reference, Standards, and Guidelines prepared by the City. However, while not yet in force and effect, Bill 17, *Protecting Ontario by Building Faster and Smarter Act, 2025*—introduced on May 12, 2025—proposes to limit the ability of municipalities to deem an application incomplete based on materials being “inadequate”. Under the proposed legislation, an application would be considered complete if the required materials were “prepared by a person authorized to practice a prescribed profession,” regardless of perceived quality of the content.

In addition, Bill 17 proposes to narrow the scope of studies that municipalities can require as part of a complete application. Specifically, it would exclude certain types of reports, including Sun/Shadow Studies, Wind Studies, Urban Design Reports, and Lighting Plans, all of which are currently identified as potential submission requirements in Table 5.1 of the Draft VOP. Given these proposed legislative changes, the City of Vaughan may need to further revise the policies and submission requirements outlined in the Draft VOP to remain in conformity with provincial legislation.

## **Conclusion**

We appreciate the opportunity to provide comments to the City and trust that our comments and recommended changes are implemented. We would be happy to meet with staff to review and discuss our comments further. We kindly request that we be kept apprised of any further meetings and updates related to the Draft Official Plan.

If you have any questions, do not hesitate to contact our office.

Sincerely,

**MHBC**

A handwritten signature in black ink, appearing to read 'Dana Anderson', with a stylized, cursive script.

Dana Anderson, MA, FCIP, RPP  
Partner

Cc: *BentallGreenOak c/o Sun Life*  
61258761.1

## **Appendix A: Comment Letter, September 27th, 2023**



September 27, 2023

TO: Fausto Filipetto, Project Manager  
City of Vaughan  
2141 Major Mackenzie Dr, Level 200  
Vaughan, ON L6A 1T1

via email: [oprmanager@vaughan.ca](mailto:oprmanager@vaughan.ca)

AND TO: Paul Freeman, Chief Planner  
Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON L3Y 6Z1

via email: [paul.freeman@york.ca](mailto:paul.freeman@york.ca)

AND TO: Hon. Paul Calandra  
Minister of Municipal Affairs and Housing  
Ministry of Municipal Affairs and Housing  
777 Bay St., 17<sup>th</sup> floor  
Toronto, ON M7A 2J3

via email: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

To all concerned,

**COMMENT LETTER - PART A OFFICIAL PLAN AMENDMENT  
BENTALLGREENOAK (CANADA) LIMITED PARTNERSHIP**

BentallGreenOak is currently in the process of submitting an application for our lands located at 255 Bass Pro Mills Drive in the City of Vaughan to facilitate the future development of the site within the Vaughan Mills Centre Secondary Plan.

The purpose of this letter is to provide our comments regarding the City of Vaughan Part A Official Plan Amendment released on Sept 7, 2023, and the regionally delineated Major Transit Station Areas. It is our understanding that the initial York Region Official Plan, which was adopted by York Region Council in June 2022, provided for an MTSA at the intersection of Rutherford Road and Jane Street which is located within the Vaughan Mills Centre Secondary Plan area. The Ministry of Municipal Affairs and Housing approved the Official Plan, with modifications, on November 4, 2022. One of the modifications was to remove the Jane/Rutherford MTSA, and instead identify it as a future MTSA, 'Future MTSA 77 - Vaughan Mills BRT Station'.

At the September 12 Committee of the Whole meeting, City of Vaughan staff sought approval of OPA 101 to delineate the Primary Major Transit Station Areas in accordance with York Region's Official Plan, which does not include the Future MTSA 77. We, in addition to a number of landowners in the area, are proposing to develop much needed housing and jobs for the Vaughan Mills Centre Secondary Plan area and strongly recommend that the City continue to recognize MTSA 77 in its plans. The MTSA at Jane and Rutherford is a much-needed transit hub and will facilitate accessible transit access to support the area's evolving transit supportive, mixed use community. It will improve transportation efficiency, reduce traffic congestion, enhance economic opportunities and enhance the vibrant, complete community being developed.

We have copied the Region and the Ministry on this letter and would further recommend that the province reinstate MTSA 77 as a planned major transit station area.

We appreciate the opportunity to provide comments to the City and hope that our recommendation is taken into consideration. We will continue to monitor the OPA and MTSA Study processes and may provide further comments. If there is anything further you may require in relation to this letter, please do not hesitate to contact us.

Yours truly,



Brad Caco  
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copies: Hon. Chris Ainsworth, Councillor, Ward 4 - [chris.ainsworth@vaughan.ca](mailto:chris.ainsworth@vaughan.ca)  
Hon. Mario Racco, Local and Regional Councillor - [mariog.racco@vaughan.ca](mailto:mariog.racco@vaughan.ca)  
Hon. Linda Jackson, Deputy Mayor and Regional Councillor - [linda.jackson@vaughan.ca](mailto:linda.jackson@vaughan.ca)  
Hon. Steven Del Duca, Mayor of Vaughan - [mayor@vaughan.ca](mailto:mayor@vaughan.ca)

## **Appendix B: Comment Letter, July 31st, 2024**



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

July 31, 2024

Fausto Filipetto, RPP, MCIP  
Project Manager  
Official Plan Review  
City of Vaughan  
2141 Major Mackenzie Drive  
Vaughan, ON  
L6A 1T1

*Via email: [oprmanager@vaughan.ca](mailto:oprmanager@vaughan.ca)*

Dear Mr. Filipetto:

**RE: COMMENT LETTER  
DRAFT #1 OF THE COMPREHENSIVE OFFICIAL PLAN AMENDMENT  
255 BASS PRO MILLS DRIVE  
OUR FILE Y5122AH**

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MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") is retained by SunLife Assurance Co of Canada (Sun Life), the registered property owner of the lands located at 255 Bass Pro Mills Drive in the City of Vaughan (the "Subject Lands") to provide comments on the Draft #1 of the Comprehensive Official Plan Amendment (the "Draft OPA").

**Background**

On October 20, 2023, applications for an Official Plan Amendment (OPA), Zoning By-law Amendment (ZBA), and Draft Plan of Subdivision (DPS) were submitted to the City of Vaughan for the Subject Lands. The proposed OPA, ZBA, and DPS, will enable the comprehensive redevelopment of the Subject Lands from the existing retail plaza to a complete, mixed use, transit-supportive, and walkable community which integrates within the evolving surrounding context of the Vaughan Mills Centre Secondary Plan area. The applications were all deemed complete on November 23, 2023.

BentallGreenOak (BGO) c/o Sun Life previously submitted a comment letter, appended hereto, on September 27, 2023, pertaining to the past Draft Official Plan (Part A) process. We understand the Official Plan Review project workplan has now been revised to consolidate the work on Part A (conformity amendment) with the Part B work into a single process and a single Draft OPA, which was released on June 18, 2024.

## Community Area

On Schedule 1 - Urban Structure, of the in-force City of Vaughan Official Plan, the Subject Lands are designated as 'Primary Centre'. In comparison, on Schedule 1 - Urban Structure of the Draft OPA, the Subject Lands are proposed to be designated as 'Community Area' and 'Primary Centre' on Schedule 1A, Strategic Growth Areas (SGAs). Policy 2.2.1.1 of the Draft OPA states that Schedule 1 illustrates the planned urban structure of the City of Vaughan, which includes the hierarchy of the SGAs. However, the SGAs are not shown on Schedule 1 rather, the urban structure consists of 'Natural Areas and Agriculture', 'Community Areas', 'Employment Areas', 'Rail Facilities' and 'Approved Regional Employment Land Conversations'. Schedule 1A identifies the Strategic Growth Areas including Primary Centres as further described below. Community Areas are described as those areas that will provide most of the City's low-rise housing stock, supported by local-serving commercial and community uses. A mix of housing types and land uses are to be encouraged in all community areas including single-detached houses, semi-detached houses, townhouses, as well as additional residential units. Gentle intensification shall be permitted in Community Areas in accordance with the land use designations shown on Schedule 13.

Policy 2.2.1.1 should be revised to state that Schedule 1 **and** Schedule 1A illustrate the planned Urban Structure of the City of Vaughan for greater clarity regarding the hierarchy of Strategic Growth Areas as a component to the Community Areas. Without this clarification, the current Policy reads that the Subject Lands are subject to the policy framework for Community Areas. The Community Area designation on its own is not reflective of the active and approved high-density development applications within the Vaughan Mills Primary Centre.

## Primary Centre

As per Schedule 1A 'Strategic Growth Areas', the Subject Lands are located in a 'Primary Centre'. Primary Centres are defined as areas of intensification, that accommodate predominantly mixed-use, high and mid-rise buildings at transit-supportive intensities (Policy 2.2.1.1a). Policy 2.2.2.6 provides policies that guide how Primary Centres **shall** be planned for, including:

- Develop with a mix of housing types and tenures including housing suitable for seniors and families with children and affordable housing;
- Include a mix of non-residential uses including retail, office, and institutional uses and human services;
- Develop at a density that is supportive of planned public transit;
- Incorporate a fine grain street network suitable for pedestrian and cyclists with appropriate internal links to surrounding community areas;
- Include an appropriate amount of, and well designed, public open spaces that are either landscaped parks, or public plazas;
- Encourage a pedestrian-friendly built form by locating active uses at grade;
- Be designed and developed to implement appropriate transition of intensity and use to surrounding Community Areas, and/or separation from adjacent Employment Areas.

Specifically, in the Primary Centres section of the Draft OPA, in a side textbox, Vaughan Mills (together with Bathurst Street & Centre Street and Weston Road & Highway 7) is described as a shopping destination of regional significance, that holds potential for residential intensification and the creation of additional uses

through the redevelopment of surface parking areas, outparcels and the eventual redevelopment or intensification of the existing shopping mall.

The above language should be incorporated into the policy framework to encourage the future redevelopment of underutilized retail plazas and surface parking lots in accordance with the Proposed Provincial Planning Statement, which would further the objectives of residential intensification, contributing towards the City's housing targets and building a complete community. In addition, we request that the word 'shall' be changed to 'should' or 'is encouraged to be', to allow for flexibility in how Primary Centres are developed.

## **Road Network**

The classification of the road network within and directly abutting the Subject Lands is depicted on Schedule 9A - Street Classification and Schedule 9B - Street Types. In the applications for the Subject Lands, each of the new proposed roads, and widenings to existing roads, conform to the right-of-way requirements of the Draft OPA, with the exception of the extension of Fishermens Way that runs east-to-west to the north of the Subject Lands. Fishermens Way (east-west), also referred to as the "Ring Road" in the Secondary Plan, is also identified as a "Special Classification" road. Schedule 9A provides a footnote that states that additional information on streets with Special Classification can be found in the corresponding Secondary Plan. It appears that while the road is identified as Special Classification, the width is consistent with Minor Collector Roads at 24 m.

The Secondary Plan provides that the Ring Road is envisioned to transition to a public mixed-use commercial street in the future. This is not anticipated during the life of Vaughan Mills Mall and the timing for its transition will be determined through the Tertiary Plan process required as described in the Secondary Plan. The Vaughan Mills Centre Public Realm and Streetscape Master Plan includes changes to the cross-sections on Edgeley Boulevard, Fishermens Way (north-south), Fishermens Way (east-west)/the Ring Road and Bass Pro Mills Drive to incorporate more active transportation elements within the right of way. As part of the applications for the Subject Lands, the cross-sectional elements of the surrounding streets that are within lands that BGO controls were revised to be consistent with the Vaughan Mills Centre Public Realm and Streetscape Master Plan designs. The current Ring Road right of way is approximately 14.5 m measured from curb-to-curb. In order to realize the vision for this right of way as a future public road the Tertiary Plan will need to be finalized. Additional lands required to meet the envisioned right of way should be accommodated by proportionate widenings between both affected landowners.

## **Safety, Parking, and Transportation Demand Management**

Reductions in parking requirements are encouraged in SGAs where transit, walking, and cycling alternatives exist. Policy 3.9.5.7 of the Draft OPA provides that guidelines are to be developed for cash-in-lieu (CIL) of parking in SGAs where it can be demonstrated that parking reductions will not have adverse impacts on surrounding areas, and where the provision of on-street or municipally provided parking can meet additional parking needs. While allowing a reduction in parking requirements in SGAs is a step in the right direction, we believe this policy should be revised to align with Bill 185's removal of parking minimums in PMTSAs and areas delineated in the official plan of the municipality surrounding and including an existing or planned higher order transit station or stop. Vaughan's SGAs meet this description without needing to be designated as PMTSAs and

therefore Policy 3.9.5.7 should be removed in order to stimulate housing development in Vaughan without the need to provide CIL for parking reductions. Policy 3.9.5.16 in the Draft OPA supports this direction in proposing to consider eliminating minimum vehicular parking requirements, including amending applicable by-laws as necessary, for multi-unit developments within Strategic Growth Areas.

## **Housing Options**

In an effort to increase purpose-built rentals, the Draft OPA identifies a target of building 2,750 purpose-built rental units by the year 2031, and 8,500 purpose-built rental units by the year 2051 (Policy 3.2.2.9). In March 2023, Vaughan Council pledged to meet the Ontario government's Housing Pledge and the City's mandated housing targets, aiming to enable the construction of 42,000 new homes in the City by 2031. Based on existing pledges made by the City, we would strongly encourage that the City pursue a higher target for purpose-built rental, which can provide a greater contribution to the City's overall housing target. Rental housing is a critical housing type for the workforce population. The proposed target of 2,750 is only 6.5% of the 42,000 target for new homes and a greater target should be allocated towards rental to aid in solving the housing crisis.

## **Built Form and Development Policies**

Section 3.3.2 consists of policies that guide built form in the City of Vaughan, including the design of redevelopments located in SGAs. Specific built form and design policies are provided for the development of mid-rise and high-rise buildings in SGAs, including the following related to parking:

- Surface parking is not permitted between the building's front or side and a public street (Policy 3.3.2.29 b); and
- Surface parking elsewhere on the lot will setback from any property line by a minimum of 3.0 metres and shall be appropriately screened through landscaping (Policy 3.3.2.29 c).

We kindly request further clarification of these two policies to confirm if 'surface parking' includes layby lanes and passenger pick-up and drop-off (PPUDO) areas. We would recommend that language be added to explicitly exempt layby lanes and PPUDOs from these policies.

Design policies and criteria are also provided for the development of high-rise buildings. In an effort to ensure appropriate privacy, minimized shadowing, and maintaining consistent urban design, criteria is provided that ensures the creation of slender, and appropriately-spaced high-rise buildings as follows:

- The base of the buildings cannot be longer than 80 metres in length (Policy 3.3.2.27 a);
- The floor plate above the 12th storey shall generally be no greater than 750 square metres, except for high-rise buildings containing office uses above the 12th storey (Policy 3.3.2.27 b); and,
- The portions of a high-rise building above 12 storeys, shall be setback a minimum of 12.5 metres from any side or rear property line (Policy 3.3.2.27 c).

The language of Policy 3.3.2.27a) should be revised to be more permissive, i.e., if appropriate building articulation is provided to the satisfaction of the City, then the length of a building base can be extended.

With regards to Policy 3.3.2.27b), flexibility should be given to high rise buildings over 30 storeys, as is seen in built form guidelines of comparable cities. For example, in the City of Mississauga's 'Downtown Built Form

Standards', towers ranging from 31-49 storeys can have floorplates up to 800 square metres, and towers with 50+ storeys can have floor plates up to 850 square metres to ensure there is still adequate GFA to create functional units and efficient floor plates when a larger area is required for the elevator core.

We believe that the intent of Policy 3.3.2.27c) can be achieved/addressed through appropriate guidelines for building orientation, tower separation, and tower height variation. A specific setback measurement should not be imposed through Official Plan policy; rather, setbacks should continue to be implemented through the applicable site zoning, not the design policies of the Official Plan.

Overall, the proposed built form and development policies are too prescriptive in nature and will inadvertently restrict the types of development that the Draft OPA envisions for SGAs. The Draft OPA reiterates the importance of making efficient use of underutilized sites in SGAs through intensification and growth, but includes restrictive design policies that limit the ability for creating vibrant, mixed-use communities, with a unique sense of place. We encourage that the Policies of Section 3.3.2 as identified above be implemented as guidelines. As they are now, the Policies will act as strict requirements which are counterproductive to the intent of the recent Provincial policy changes to encourage the development of housing.

## **Conclusion**

We appreciate the opportunity to provide comments to the City and trust that our comments and recommended changes are implemented. We kindly request that we be kept apprised of any further meetings and updates related to the Draft Official Plan.

If you have any questions, do not hesitate to contact our office.

Sincerely,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner



Melinda MacRory, M.Pl., MCIP, RPP  
Associate

Cc: *BentallGreenOak c/o Sun Life*  
61258761.1



## **Appendix C: Comment Letter, March 4th, 2025**



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

March 4th, 2025

Fausto Filipetto, RPP, MCIP  
Project Manager  
Official Plan Review  
City of Vaughan  
2141 Major Mackenzie Drive  
Vaughan, ON  
L6A 1T1

*Via email: [oprmanager@vaughan.ca](mailto:oprmanager@vaughan.ca)*

Dear Mr. Filipetto:

**RE: COMMENT LETTER  
NEW DRAFT VAUGHAN OFFICIAL PLAN, 2025  
255 BASS PRO MILLS DRIVE  
OUR FILE Y5122AH**

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MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") is retained by SunLife Assurance Co. of Canada ("Sun Life"), the registered property owner of the lands located at 255 Bass Pro Mills Drive in the City of Vaughan (the "Subject Lands") to provide comments on the New Draft City of Vaughan Official Plan, 2025 ("Draft VOP 2025"), released in January 2025.

**Background**

On October 20, 2023, applications for an Official Plan Amendment ("OPA"), Zoning By-law Amendment ("ZBA"), and Draft Plan of Subdivision ("DPS") were submitted to the City of Vaughan for the Subject Lands. The proposed OPA, ZBA, and DPS, will enable the comprehensive redevelopment of the Subject Lands from the existing retail plaza into a complete, mixed use, transit-supportive, and walkable community that integrates within the evolving surrounding context of the Vaughan Mills Centre Secondary Plan area. The applications were all deemed complete on November 23, 2023.

BentallGreenOak (BGO) c/o Sun Life previously submitted a comment letter, appended hereto, on September 27, 2023, pertaining to the past Draft Official Plan (Part A) process. We understand that following this letter, the Official Plan Review project workplan was revised to consolidate the work on Part A (conformity amendment) with the Part B work (additional supplementary policies) into a single process and a single Draft OPA, which was released on June 18, 2024. BentallGreenOak (BGO) c/o Sun Life also submitted a comment letter, appended hereto, on Draft #1 of the Comprehensive OPA for the Vaughan Official Plan ("Draft #1 of the OPA") on July 31, 2024.

On January 14, 2025, the City of Vaughan released a new Draft VOP 2025, that was presented to the Committee of the Whole on January 22, 2025. We have completed a review of the Draft VOP 2025 and appreciate that the City has incorporated several of our comments into the Draft VOP 2025 particularly, the delineation of “Strategic Growth Areas” on Schedule 1, Urban Structure. The following letter outlines the comments made on the previous Draft #1 of the OPA that were not addressed through the Draft VOP 2025, and new comments on policies that were introduced through the Draft VOP 2025.

## **Outstanding Comments**

### **Primary Centre**

In the side textbox of the Primary Centres section of the Draft VOP 2025, Vaughan Mills (together with Bathurst Street & Centre Street and Weston Road & Highway 7) is described as a shopping destination of regional significance that holds potential for residential intensification and the creation of additional uses through the redevelopment of surface parking areas, outparcels and the eventual redevelopment or intensification of the existing shopping mall.

The above noted language should be incorporated into the policy framework of the Draft VOP 2025, to encourage the future redevelopment of underutilized retail plazas and surface parking lots that is consistent with Policy 2.2.1(b) of the Provincial Planning Statement. Incorporating this language into the policies of the Draft VOP 2025 will support residential intensification that will contribute towards the City’s housing targets and the creation of a complete community.

### **Parking**

Policy 3.9.5.7 of the Draft VOP 2025 states that guidelines are to be developed for cash-in-lieu (“CIL”) of parking in Strategic Growth Areas (“SGAs”), where it can be demonstrated that parking reductions will not have adverse impacts on surrounding areas and where the provision of on-street or municipally provided parking can meet additional parking needs. While allowing a reduction in parking requirements in SGAs is positive, this policy should be revised to be consistent with Section 16(22) of the *Planning Act* which removed parking minimums in “*PMTSAs and areas delineated in the official plan of the municipality surrounding and including an existing or planned higher order transit station or stop*”. Vaughan’s SGAs including, the Vaughan Mills Primary Centre and future MTSA, would meet the criteria set out in Section 16(22) of the *Planning Act* as areas without parking minimums. Therefore, Policy 3.9.5.7 should be removed in order to be consistent with Section 16(22) of the *Planning Act*, and to stimulate housing development in Vaughan without the need to provide CIL for parking reductions. At a minimum, the Draft VOP 2025 should reduce or exempt CIL of parking for affordable, attainable and purpose-built rental units in SGAs.

### **Built Form and Development Policies**

Section 3.3.2 consists of policies that guide built form in the City of Vaughan, including the design of redevelopments located in SGAs. Specific built form and design policies are provided for the development of mid-rise and high-rise buildings in SGAs, including the following related to parking:

- Surface parking is not permitted between the building's front or side and a public street (Policy 3.3.2.29(a)); and,
- Surface parking elsewhere on the lot will be setback from any property line by a minimum of 3.0 metres and shall be appropriately screened through landscaping (Policy 3.3.2.29(b)).

We request further clarification of these two policies to confirm if "surface parking" includes layby lanes and passenger pick-up and drop-off (PPUDO) areas. We would recommend that language be added to explicitly exempt layby lanes and PPUDOs from these policies. The metric setback of 3.0 metres should also be provided in the implementing zoning or through design guidance and not in an Official Plan policy. Placing such regulations into policy creates a situation where an Official Plan Amendment would be required for a contextually appropriate reduction which is highly inappropriate.

Design policies and criteria are also provided for the development of high-rise buildings. In an effort to ensure appropriate privacy, minimize shadowing, and maintain consistent urban design, criteria has been provided that ensures the creation of slender, and appropriately spaced high-rise buildings as follows:

- The base of the buildings cannot be longer than 80 metres in length (Policy 3.3.2.26(a));
- The floor plate above the 12th storey shall generally be no greater than 750 square metres, except for high-rise buildings containing office uses above the 12th storey (Policy 3.3.2.26(b)); and,
- The portions of a high-rise building above 12 storeys, shall be setback a minimum of 12.5 metres from any side or rear property line (Policy 3.3.2.26(c)).
- Where more than one high-rise building is located on the same lot, the distance between any portions of the high-rise buildings above twelve storeys shall generally be at least 25 metres (Policy 3.3.2.26(d)).

Urban design direction should not be mandated in policy that obligates developers to design their buildings to specific standards that limit the uniqueness of context, site design, and built form. Urban Design Guidelines should be used as guidelines that create a general direction for built form. The numerical standards outlined in Policy 3.3.2.26 should be removed, and instead, the Draft VOP 2025 should provide broader objectives and guidance for urban design that allows for greater flexibility and individuality in building design. The Draft VOP reiterates the importance of making efficient use of underutilized sites in SGAs through intensification and growth but includes restrictive design policies that limit the ability for creating vibrant, mixed-use communities, with a unique sense of place. We encourage that the policies of Section 3.3.2 as identified above be implemented as guidelines, rather than as mandatory prescribed policy.

## **New Comments**

### **Population and Employment Forecasts**

As per Table 2.1, Population and Employment Data and Forecasts for the City of Vaughan, in the Draft VOP 2025 the City of Vaughan is forecasted to grow to a population of 398,300 by 2031, 478,900 by 2041, and 575,900 by 2051. In contrast, the previous Draft OPA to the VOP from June 2024, states that the City of Vaughan is forecasted to grow to a population of 407,300 by 2031, 487,500 by 2041, and 576,200 by 2051. It would be helpful to understand why the forecasted population growth has decreased in the Draft VOP 2025

compared to the Draft OPA from June 2024, and how that has impacted the land use permissions and scale of growth in the Draft VOP 2025.

## **Future MTSA**

The Region of York Official Plan (now part of the City of Vaughan Official Plan) identified a Future MTSA ("Future MTSA 77, Vaughan Mills BRT Station") at the intersection of Rutherford Road and Jane Street which, the City of Vaughan has illustrated on Schedule 1A, Strategic Growth Areas of the Draft VOP 2025. As per the Region's preliminary mapping for Future MTSA 77, the Subject Lands lie immediately east of the boundary for the Future MTSA. According to Policy 2.2.2.19 of the Draft VOP 2025, the location of Future MTSA as shown on Schedule 1A are considered preliminary and general, with final boundaries to be determined once there is a financial commitment for the construction of the higher-order transit infrastructure.

We understand that the City will conduct further studies and assessments to finalize the delineation of Future MTSA 77, based on the Region's proposed boundaries and funding commitments for transit infrastructure. Given the proximity of the Subject Lands to the Region's preliminary delineation of Future MTSA 77 and their location within a designated SGA identified as a "Primary Centre", we request that the Subject Lands be included in studies and evaluations for the Future MTSA 77. BGO is actively interested in participating in the study of Future MTSA 77 and would appreciate if the City can confirm the estimated timeline and process for advancing the study and planning of Future MTSA 77. In particular, given the potential for transit-supportive growth on the Subject Lands, BGO would support the consideration of Future MTSA 77 as a PMTSA and would like to be included in any discussions on the potential for Future MTSA 77 to be designated as a PMTSA.

## **Built Form**

Policy 3.3.2.24 of the Draft VOP 2025 states that the separation distance between the tower portion of high-rise buildings will be a minimum of 25 metres. This is a new policy that was not in the previous Draft OPA from June 2024. Later in the Draft VOP, Policy 3.3.2.26(d) states that the distance between any portion of a high-rise building above the 12<sup>th</sup> storey shall generally be at least 25.0 metres. These policies should be consolidated into one, and clarity should be provided on whether the 25.0 metre tower separation applies to any storey above the podium or to any storey above the 12<sup>th</sup> storey. As stated previously, incorporating tower separation distances into Official Plan policy as prescriptive requirements is counterintuitive to the intent of Official Plans that provide general guidelines to support growth and intensification in SGAs.

Policy 3.1.3.1 of the Draft VOP 2025 states that development applications are subject to the City's Sustainability Metrics Program and must meet a minimum bronze, or silver threshold if they are in an SGA. Policy 3.3.2.25 of the Draft VOP 2025 then states that high-rise buildings will be designed to attain near net-zero greenhouse gas emissions and implement district energy, green infrastructure, or other innovative sustainability elements. Policy 3.3.2.25 of the Draft VOP 2025 should be simplified to incorporate more permissive language, such as "are encouraged to", or "should" rather than obligatory language such as the word "will" when describing the sustainable design measures that may be incorporated into high-rise buildings. The thorough screening process facilitated through the City's Sustainability Metrics Program is sufficient to ensure that development in Vaughan considers measures for sustainable design and green infrastructure. The use of more permissive language

when describing sustainable development initiatives will provide flexibility for landowners to explore which sustainable design measures best suit their development.

## **Parkland**

### ***Parks and Open Space***

Section 3.5, Parks and Open Space of the Draft VOP 2025 has changed significantly from the previous Draft #1 of the OPA. The previous draft contained a hierarchy of parkland in the City of Vaughan, and specific policies for the design, size, and intent of each type of park including, Regional Parks, District Parks, and Neighbourhood Parks. The Draft VOP 2025 describes the intent of different types of parks in the City of Vaughan in Policy 3.5.2.1 but does not contain policies which describe the design objectives, programming options or permitted recreational uses, or typical sizes of the parks. A separate section, Section 3.5.4, Parks and Open Space Design then provides general design guidelines for parks throughout the City. The Parks and Open Space policies of the Draft VOP 2025 are fragmented and force the reader to piece information together from multiple different sections of the Plan. It would be helpful to consolidate the goals, general size guidelines, locational requirements, and design criteria for each park type into sequential policy sections, that clearly illustrate the City's vision for the parkland system.

### ***Strata Parks***

Policy 3.5.2.4(b) states that where a Strata Park is conveyed to the City no private infrastructure shall be permitted beneath the park including, private stormwater management infrastructure, private water or wastewater infrastructure, electrical infrastructure, or any other utilities or infrastructure not directly servicing the parks operations and maintenance, with the exception of parking stalls. It would be helpful for the City to provide clarity as to why private infrastructure cannot be located beneath Strata Parks, as these parks are intended to increase public parkland through the use of encumbrances through stratified ownership arrangements. It would also be beneficial to clarify that all infrastructure required for parking including, plumbing, electrical, and HVAC, is permitted under Strata Parks.

### ***Privately Owned Public Spaces (POPS)***

Policy 3.5.3.1 of the Draft VOP 2025, categorizes Privately Owned Public Spaces ("POPS"), as an "Open Space Typology" that while owned and maintained by private entities are open for public use and is over and above parkland dedication. Policy 3.5.5.8 then states that POPS may be eligible for parkland dedication credit towards the parkland dedication requirements for a development, subject to the requirements of Section 3.5.3.2 and 3.5.4 These policies are contradictory in nature, as Policy 3.5.3.1 states that POPS are over and above parkland dedication whereas Policy 3.5.5.8, states that POPS may be eligible towards parkland dedication. These policies need to be simplified and present an aligned policy on if and how POPS may be used for parkland dedication.

## ***Parkland Dedication***

As per Policy 3.5.5.2 parkland conveyance for residential development is calculated as a percent of the net developable area of a site. In Policy 3.5.5.4 the cap for parkland contributions for residential or mixed-use development is calculated as a percent of the gross developable area. Clarification should be provided by the City as to why net developable area is used to calculate parkland contributions, but gross development area is used to determine the cap of parkland dedication that may be requested. Calculating the cap for parkland contributions as a percent of gross development area increases the cap for the land area that the City may require for parkland contribution, than what would be required if the cap was taken as a percent of net developable area.

## **Conclusion**

We appreciate the opportunity to provide comments to the City and trust that our comments and recommended changes are implemented. We would be happy to meet with staff to review and discuss our comments further. We kindly request that we be kept apprised of any further meetings and updates related to the Draft Official Plan.

If you have any questions, do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dana Anderson', with a stylized, cursive script.

Dana Anderson, MA, FCIP, RPP  
Partner

Cc: *BentallGreenOak c/o Sun Life*  
61258761.1