



64 JARDIN DRIVE, UNIT 1B
CONCORD, ONTARIO L4K 3P3

T 905.669.4055

KLMPLANNING.COM

File: P-2160

June 3, 2025

City of Vaughan
Development Planning Department
2141 Major Mackenzie Drive
Vaughan, ON L6A 1T1

C128.
Communication
CW(PM) – June 4, 2025
Item No. 10

Attention: Hon. Mayor Del Duca and Members of Council

Re: Committee of the Whole (Public Meeting), Wednesday June 4, 2025
Agenda Item. 4(10)
City of Vaughan revised Draft New Official Plan, May 2025
Block 66W Landowners Group Inc.
City of Vaughan
Regional Municipality of York

KLM Planning Partners Inc. is the land-use planning consultant acting on behalf of the Block 66W Landowner Group Inc (the "Landowners"), who collectively own approximately 175.6 hectares (433.9 acres) of land within Block 66 West in the City of Vaughan (the "City"), Region of York (the "Subject Lands"). The Subject Lands are bounded by Major Mackenzie Drive to the south, Highway 50 to the west, Nashville Road to the north and a mid-concession Hydro corridor to the east. A map identifying the location of the Subject Lands is attached herein.

On March 7, 2025, the Landowners submitted an application for Block Plan approval to the City for Block 66 West, which was accompanied by a series of technical reports, including a Master Environmental Servicing Plan, Environmental Impact Study, Transportation Study, amongst others, which is currently under review and proceeding to a public meeting on June 4, 2025.

KLM has been monitoring and participating in the City's Official Plan Review (the "OPR") on behalf of the Landowners and previously provided comments to the City on July 31, 2024 related to the revised Draft Comprehensive Official Plan Amendment, which combined the previous Part A and Part B OPR work, released in June 2024. In May 2025, the City released a further revised Draft New Official Plan (the "Draft OP") for review and comment. KLM has completed a review of the Draft OP on behalf of the Landowners and provide the following comments:

1. We note that the Draft OP does not propose changes to Section 11.9, the West Vaughan Employment Area Secondary Plan. We support this approach, however request that the City work with the Ministry of Transportation on removing the "Corridor Protection" overlay which identifies the previous limits of the GTA West Corridor Protection Area, given the progress that has been made by the province on this project. Refinement of the Corridor Protection Area would free up otherwise constrained land and would help to speed up the development of needed employment lands.

2. Section 1.4.1.8 – This section provides policies to assist in the interpretation of the boundaries of land use designations. With respect to Prestige Employment and General Employment land uses, it is noted specifically that the use abutting an arterial street or Provincial highway shall be interpreted to extend one lot depth in from the arterial street or Provincial highway. We note that this reflects existing policy 10.2.1.6 from the Vaughan Official Plan, 2010 (the “VOP 2010”). We are concerned with the potential challenges in the implementation of this policy, particularly given the evolving employment context that favours large employment blocks. This policy could have the effect of prohibiting general employment uses in instances where no lot creation occurs within employment lands to facilitate large employment users. Properties which are split designated should be permitted to be used in accordance with the underlying land use designation. We are not aware of similar policies in Official Plans in other municipalities and would recommend that this policy be revised to note that the interpretation of land use boundaries will be determined through more detailed planning applications such as applications for zoning by-law amendment.
3. Section 1.4.2.4 – This section provides transition policies for Development (as defined) applications in process but does not reference non-statutory applications such as Block Plans. These applications are not required to be ‘deemed complete’. Notwithstanding, Block Plan application are required by the City to conform to the Official Plan. As such, we respectfully request that this policy be revised to note that the transition policies are intended to apply to Block Plan applications.

We further request that the reference to the date an application is deemed complete be revised to the date an application has been received by the City. In many cases, advancing to a formal “Complete Application” takes an excessively long time. With the approval of Bill 185 and the removal of mandatory pre-consultation requirements, further flexibility in the policy framework will provide additional certainty to applicants.

4. Section 1.4.2.7 – This policy introduces the intent of Council to repeal the transition provisions for applications in process at the time of the next Official Plan Review or five years after the approval of the plan, whichever occurs first. With current market uncertainty, we are concerned that repealing transition provisions within any timeframe will create unnecessary challenges in the approval process. The development approval process is complex and many projects, particularly large multi-phased projects which may involve multiple owners, often require more than five years to be completed. On this basis, we respectfully request that this policy be deleted, and that the existing VOP 2010 remain in effect for purposes of interpreting and implementing previously approved and active applications submitted pursuant to same.
5. Section 2.14.1.37 – This section provides that a minimum of two north/south and two east/west collector streets be provided in new block Development, where feasible. This policy is overly prescriptive and should simply direct that the number and extent of collector streets within new block development be determined at the secondary plan stage, based upon detailed traffic studies.
6. Sections 4.3.3.2 to 4.3.3.21 provide built form policy requirements applicable to the design of the built environment. In many instances, prescriptive requirements associated with setbacks, unit sizes, building separation, etc. are provided, which in our opinion are more appropriately provided in the implementing Zoning By-law. We respectfully request that these sections be reviewed and revised to provide the general framework for these uses, rather than prescriptive requirements.
7. Definition of Major Office – Major Office is defined as having a gross floor area of greater than 4,000 square metres or with approximately 200 jobs or more. The policy framework of the Draft OP directs Major Office to Strategic Growth Areas consistent with the Provincial Planning

Statement, 2024 (the “PPS 2024”). The VOP 2010 identifies major office uses as having a gross floor area of greater than 12,500 square metres and an office use as having a gross floor area of less than 12,500 square metres.

For reference, the origin of the 4,000 square metres threshold for Major Office uses comes from the definition for Major Office in the now repealed A Place to Grow: Growth Plan for the Greater Golden Horseshow (the “Growth Plan”). This definition was also included in the 2022 York Region Official Plan to conform to the Growth Plan. As the Growth Plan has now been repealed, there is no framework in provincial planning to prescribe the 4,000 square metre threshold. The PPS 2024 restricts Major Office uses to Strategic Growth Areas and limits office uses in employment areas to be associated with the primary employment use e.g. manufacturing, warehousing, etc.

As currently proposed, this definition has the effect of limiting the amount of office use within Employment Areas when associated with a permitted employment use, which would need to have an area of less than 4,000 square metres in order to not be considered Major Office. As such we respectfully request that the City modify the definition of Major Office to specify that they must be within a freestanding building and increase the threshold to 12,500 square metres consistent with the Official Plan 2010. This will permit office uses within an employment area associated with an employment use which may exceed 4,000 square metres, and which are otherwise appropriate.

8. Schedule 9B – We note that the right of way width for major collector roads has increased from 26 metres in the VOP 2010 to 30 metres in the Draft OP. We are not clear the rationale for the increase and what has prompted the additional 4 metres. This land could otherwise be used for development. We respectfully request clarification in this regard.

Thank you for the opportunity to provide input into the OPR. We kindly request notice of any future reports and/or public meetings and consultations regarding the Draft OP, and that we receive notice of any decision of City Council.

Should you have any questions or concerns or if you require any additional information on the contents of this letter, please do not hesitate to contact the undersigned.

Yours truly,

KLM PLANNING PARTNERS INC.

A handwritten signature in blue ink, appearing to read 'T. Schilling', is written over the company name.

Tim Schilling BES, MCIP, RPP
Senior Planner

cc. Client
Fausto Filippetto, Project Manager

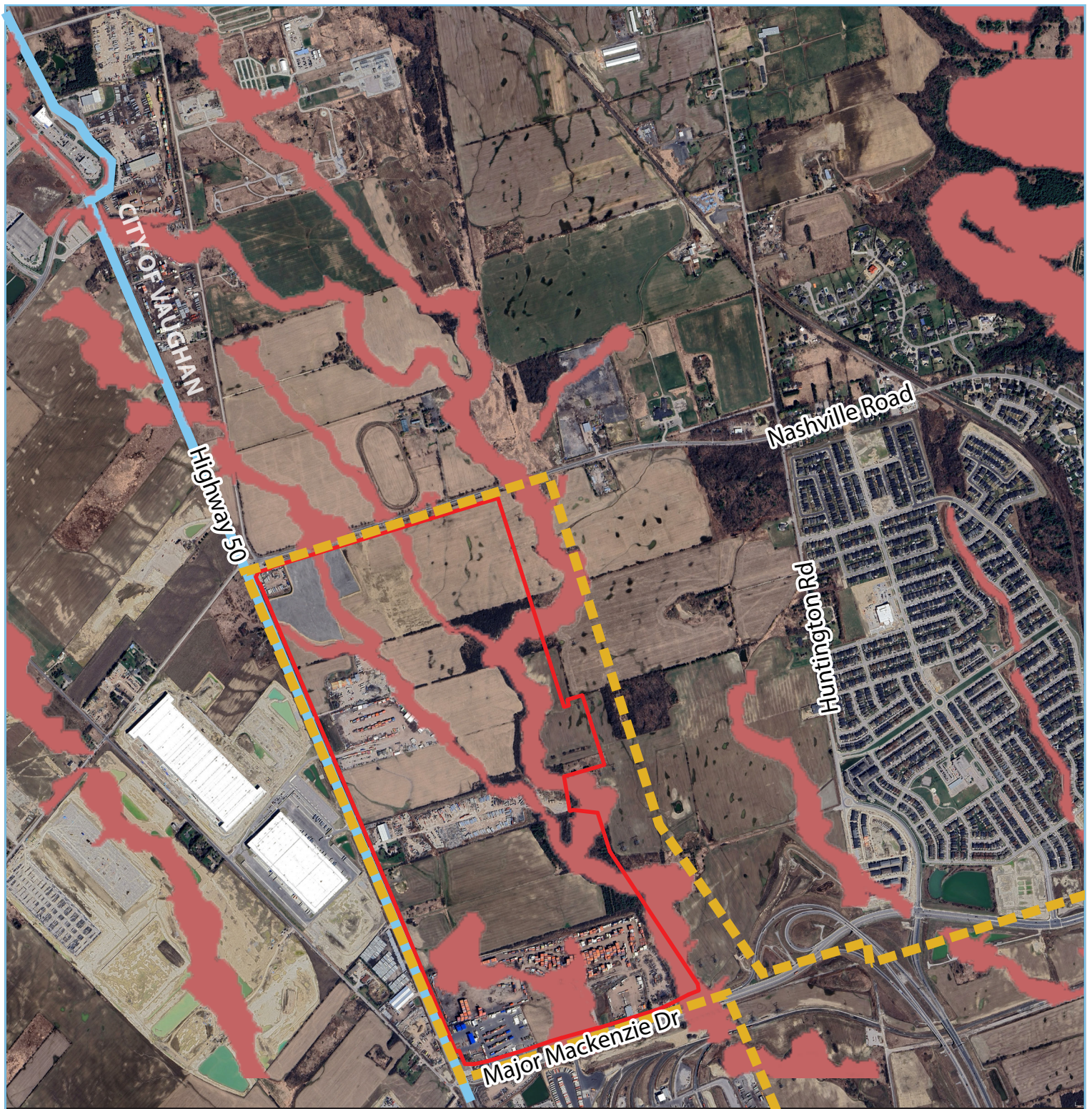


Figure 1
Context Map

LEGEND

- Subject Lands
- - - Secondary Plan Area
- Municipal Boundary
- Floodplain