



C140.
Communication
CW(PM) – June 4, 2025
Item No. 10

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June 3, 2025

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

Attention: Hon. Mayor Del Duca and Members of Council

Re: Committee of the Whole (Public Hearing) June 4, 2025, Item #4.10
Forward Vaughan – Vaughan Official Plan Review
Official Plan Draft – May 2025

KLM Planning Partners Inc. ("**KLM**") is the land use planning consultant for Melrose Investments Inc. and Townwood Homes (the "**Client**"). Our client owns a series of landholdings within the VMC Secondary Plan Area in the City of Vaughan, some with development approvals or currently under construction.

Further to the March 25, 2025 submission made on behalf of our client to the VMC Sub-Committee, KLM has had an opportunity to review the May 2025 Draft of VOP 2025 with our client and we are pleased to provide the following preliminary comments to some of the new and updated policies included within the proposed updated VMC Secondary Plan:

New Policy 4.2.3 - Supporting Growth

"Development in the VMC shall only be permitted if it can be demonstrated to the satisfaction of the City that sufficient parkland will be provided within the VMC Secondary Plan Area, or in areas in proximity to and accessible from the VMC, to provide for a minimum of 0.3 ha of parkland per 1,000 residents."

How will this be assessed by the applicants? We are concerned that this new requirement could effectively halt development approvals unless it is tied to the provision of physical parkland as it is currently not clear cash-in-lieu for parkland count towards the provisioning of parkland for development sites where park sites are not identified.

New Policies 4.3.2 and 4.3.3 - Orderly Development

It is not clear what defines a phase of development within the VMC? How will each development application be evaluated on the merits of the stated intention to support orderly growth by phase?

Policy 5.3 - Street Network

We are concerned that Highway 7 is now proposed to have a planned Right-of-Way of up to 68.2 metres throughout the VMC, whereas it is currently identified to be up to 45 metres east of Jane Street and up to 60 metres west of Jane Street. The width of Highway 7 through the VMC was previously set by the requirements to implement the VIVA BRT system and supporting infrastructure. Why is this being increased?

We are also concerned that Major and Minor Collectors have dropped their respective lower minimum requirements.

Policy 7.1 - General Parks and Open Space

"The City shall develop a minimum of 28 hectares of parkland in the VMC through the acquisition and development of parks identified in Schedule E. This parkland shall serve as the core of the parks system and shall not be substituted by other areas or other forms of open space. Parkland not identified in Schedule E shall not count toward the minimum."

We are concerned this is more prescriptive than the existing policy which provides for alternative parkland arrangements, including acquiring lands adjacent to the VMC.

Policy 7.2.5 - Park Types

We are concerned the criteria for each park type is too prescriptive. Considering the urban setting, these should be guidance with exceptions to the requirement, where deemed appropriate.

Policy 7.6.3 - Implementation

"The City shall require parkland to be dedicated in a coordinated manner that creates complete and cohesive park blocks. Where a park shown on Schedule E spans multiple development parcels:

a. The full park block shall be secured and dedicated as a single coordinated conveyance; and

b. Partial dedications shall only be considered where they form part of a comprehensive strategy to achieve the complete park block."

We are concerned as to what constitutes a comprehensive strategy to achieving a complete park block if the balance is on non-participating landowners. This policy should be revised to indicate that parkland should be dedicated in this coordinated manner to provide flexibility.

Policy 8.2 – Schools

Further to our previous submissions, we continue to be of the opinion that new schools in the VMC should only be permitted as a component of a mixed use high-density residential development. While we are encouraged by the proposed policy that provides for reduction to the minimum school site size where an alternative arrangement has been made with a school board, providing a default minimum size for school sites that is more keeping with suburban stand-alone use standards does not provide the strong direction for school boards to work collaboratively with landowners to develop new urban schools.

Policy 9.1.5 - General Land Use and Density

"Development in the VMC shall demonstrate to the satisfaction of the City that sufficient retail and service uses are present to support the anticipated needs of the local population for daily necessities, as per the intent of this Plan."

Is this an assessment that needs to be prepared by an applicant in support of a development application in spite of the proposed policy that requires a minimum of 10% GFA for non-residential uses within Mixed Use development? This should not be a direct application requirement and should be rephrased as a goal of the Plan.

Policies 9.1.16 and 9.1.16 – Land Use Compatibility

This is a new requirement for sensitive land use evaluation for all development within 1000m of an Employment Area and the MacMillan Rail Yard, including appropriate separation distances area maintained. At the same time, we noticed that the policy has now removed references to the ability of Council to grant Class 4 Designation to development sites and areas. This should be carried over in the update.

New Policy 9.1.17- Land Use Compatibility:

This introduces provisions to securing mitigation measures as recommended by technical evaluations in support of proposed sensitive land use developments through development approvals. We asked that this be the mechanism for the boundary properties to demonstrate if sensitive land uses can be introduced. If the technical assessment of sensitive land uses is now a requirement for all developments within 1000m of Employment Lands and the

MacMillan Rail Yard, why can't it be the mechanism to assess if sensitive land uses can locate along the boundary of the VMC? As we have previously submitted to the VMC Sub-Committee and to Staff, the parcels at the boundaries of the VMC should not be restricted to non-residential uses. There should be provisions to allow for technical studies to demonstrate the appropriateness of locating sensitive land uses at those locations, similar to the requirement for elsewhere in the Plan now being introduced through Policy 9.1.17.

Policy 9.2 - Mixed Use Designation

We appreciate that Live-Work Units and Privately Owned Public Spaces are clearly permitted now.

New Policies 9.2.4 and 9.2.5 - Minimum Retail GFA and Transfers

As previously submitted to the VMC Sub-Committee and Staff, we still believe a minimum of 10% GFA for non-residential uses is too prescriptive and does not allow for flexibility on a site-by-site evaluation. While it is appreciated there is a proposed provision to consider a lower amount than 10% on a site, the requirement to have that reduction be transferred to another site is again too onerous to implement and does not allow for demonstration through market needs. We are concerned requiring a minimum of 10% on all developments could result in an over-supply of non-residential uses.

New Policy 9.7 - Housing

We are concerned with the minimum requirement of 35% of new residential units within the VMC being affordable and that a portion which shall be accessible. It is not clear what is the criteria for affordable housing is and what portion of those units needs to be accessible? Will the City be tracking the amount of affordable housing throughout the VMC for implementation of this requirement? For comparison, the City of Toronto currently sets this requirement within PMTSAs at 5-10%, depending on the Market Area requirement. It should be noted that the Province's proposed Amendment to O.Reg 232/18 for Inclusionary Zoning sets the maximum at 5% for a maximum of 25 years.

We are also concerned with the prescription of a minimum of 15% of new dwelling units being 3 bedrooms as it may be too onerous. For reference, The City of Richmond Hill proposes 5% of high-density units be 3 bedrooms or larger.

Policy 9.9.21 - Massing – floor heights

We believe that setting minimum floor heights for ground and above ground floors for all uses is too prescriptive. This could be rephrased to encourage floor heights to be developed in this manner.

Policy 9.9.24 - Massing

"Towers shall be set back from the edges of podiums by a minimum of 3 metres."

We believe the current provision seeking tower setbacks functions well and do not require prescribing minimums.

Policy 9.9.25 Massing – Tower Floorplate

While it is appreciated the maximum average residential tower floorplate is proposed to be increased from 750 m² to 800 m² and variations to floorplates may be considered, we request clarification that the variation include larger floorplates.

Policy 9.9.26 Massing – Tower Separation

It is not understood why the tower separation is proposed to be increased to a minimum of 35m within the Neighbourhood designation, up from the current requirement of 25m. This creates inconsistencies with the current policy as it relates to in process or approved development. We don't believe a new provision requiring a setback of a minimum of 50% of the required tower separation to a side or rear property line is necessary given it is already regulated by the Zoning By-law. Prescribing this requirement in the Secondary Plan will necessitate an Official Plan Amendment to permit reductions in situations where tower separation is still maintained across two sites.

Policy 11.4 - Plans of Subdivision

We are of the opinion that conveyance of land for streets, parks and other public facilities could be secured through a Site Plan Approval process and should not require the need for a Draft Plan of Subdivision process, which creates an additional layer of processing and from our experience in the VMC, long timeframes for registration of the Subdivision, leading to longer lead time for construction start. Elimination of the requirement for a Draft Plan of Subdivision will expedite the delivery of much needed housing and community facilities of all types within the VMC.

The comments above represent our preliminary comments with regard to the Draft VOP 2025. We respectfully request a meeting with the City to discuss our preliminary comments on the Draft VOP 2025 in more detail with City staff.

We look forward to continuing our participation in the Forward Vaughan, Draft VOP 2025 process and collaborating with the City. We may make further detailed submissions following the release of subsequent editions of the Draft VOP 2025 and reserve the right to provide additional comments on the current draft, as required.

We respectfully request notice of any future reports and/or public meetings and consultations regarding the Official Plan Update, and that we receive notice of any decision of City Council.

Yours truly,

KLM PLANNING PARTNERS INC.

A handwritten signature in blue ink, appearing to read 'Billy Tung', is positioned below the company name.

Billy Tung, BES, MCIP, RPP

Partner

cc. Client

Christina Bruce, Director of Policy Planning and Special Programs