

C145.
Communication
CW(PM) – June 4, 2025
Item No. 10

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MGP File: 19-2836

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

via email: clerks@vaughan.ca

Dear Members of Committee of the Whole:

RE: Item 4.10: Draft Vaughan Metropolitan Centre Secondary Plan
Comments on behalf of the Portage Conversion Landowners Group

Malone Given Parsons Ltd. is the Planning Consultant and Group Manager for the Portage Conversion Landowners Group (“**Portage Landowners**”), who own approximately 7.0 hectares of land on the north side of Portage Parkway between Millway Avenue and Applewood Crescent (“**Portage Lands**”) in Expansion Area B. On behalf of the Portage Landowners, we have been actively participating in the Vaughan Metropolitan Centre Secondary Plan (“**VMCSP**”) Update by providing commenting letters, meetings with City Staff, and speaking before the VMC Subcommittee on numerous occasions.

MGP has reviewed the materials to be presented at the June 4th Public Meeting for the Draft Vaughan Official Plan, including the VMC Secondary Plan, and provide the following comments.

Comments on Schedules

Parkland Configuration and Mews identified on the Portage Lands

The Portage Landowners continue to have concerns with respect to the parkland distribution within the Portage Lands and with the proposed mews located north of Portage Parkway, between Applewood Crescent and Edgeley Boulevard, and shown on multiple schedules of the VMCSP. Our concerns are expressed in detailed in previous correspondence and remain valid with the draft materials presented on June 4th, however, we have been working collaboratively with project Staff to find solutions to these concerns and are confident based on current correspondence a solution is near at hand. Should the schedules not be revised our concerns outlined in the March 25, 2025 letter to the VMC Subcommittee remain.

Future Subway Line Alignment

We request that this alignment be adjusted to match the Millway Ave right-of-way to not unduly impede the adjacent properties. We request clarification if this linework reflects the ‘built’ location and alignment of the subway tunnel.

Considering the potential impacts of the future extension beneath adjacent sites on future redevelopment efforts, we consider this information of paramount importance. If the intent is that the future extension would cross any potential development site, we suggest it is necessary to include policies outlining as such, including policies 5.2.3, 5.3.17, and 9.1.13.

Comments on Policies

1. Policy 4.2.2 states that:

“All development approvals within the VMC shall be conditional upon commitments to identify, fund, plan and implement the required elements of this Plan, including the water, wastewater, stormwater and transportation systems, parks and community services, to the satisfaction of the City and the Region, as applicable. Further, all improvements to water, wastewater, stormwater and transportation systems required to support any development application shall be identified, funded, planned and implemented in advance of, or concurrent with the removal of a Holding Symbol (H) and/or the issuance of any building permit, to the satisfaction of the City and the Region, as applicable. Development will not be permitted to proceed within the VMC until the City is satisfied that sufficient capacity within the transportation system can be funded, planned and implemented to support it, as per the VMC TMP.”

We suggest this policy be broken down into three separate policies (i.e. each sentence a separate policy). We also request clarification on what the first sentence is asking for; commitments from whom? Funding is provided from agencies, developers, and the municipalities who have varying responsibilities. We are concerned that commitments will be expected from the Portage Landowners for areas outside the scope, such as for community services that is out of their purview.

2. Policy 4.2.3 states that:

“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.”

This parkland provision is above and beyond what can be acquired by the municipality through the Parkland Dedication requirements of the Planning Act. Parkland dedication is generally dealt with through site by site development applications and this provision appears to delay development due to no fault of an application should the City not have sufficient parkland acquired.

3. Policy 4.3.2 states that

“Given the extended projected timeline for full build-out of the VMC, the objective to create a contiguous complete community that will expand over time, and the intent to support orderly development, each phase of development shall:

a. Contribute to key public spaces and community focal points, such as Millway Avenue (between Portage Parkway and Doughton Road) and the parks system;

b. Contribute to the rational and contiguous extension of redeveloped built form, the public realm and active transportation networks from the central spines of Highway 7 and Millway Avenue;

c. Contribute significant non-residential uses;

d. Contribute significantly to the provision of community services; and/or

e. Be located within close proximity of a higher-order transit station.”

We understand and agree with the above goals as general notions for the VMC, but suggest that the word “shall” be replaced with “be encouraged to”.

4. Policy 4.3.4 States that:

“All development within VMC shall be subject to an implementing Zoning By-law and Site Plan Approval. All implementing Zoning By-law approvals shall be subject to a Holding Symbol (H). The phasing of development shall be established on the basis of the requirements for the removal of the Holding Symbol (H), in accordance with the policies of this Plan, including consideration for the growth management policies in Section 4 and the intent to support the orderly development of the VMC.”

This appears to be a misuse of the Holding provisions, where ALL applications are subject to holding regardless of conditional requirements such as servicing, infrastructure or allocation. Such an approach to holding could delay the delivery of housing and funding to the City.

5. Policy 5.3.2 states that

“Minor modifications to the location and alignment of planned streets are permitted without amendment to this Plan, provided the intersections in Schedule C that include a major or minor collector street or arterial street are maintained in their general location. [...] The precise location, alignment and design of the streets and mews identified on Schedule C shall be determined by the City through a municipal class Environmental Assessment and/or the development application process, as appropriate, in consultation with the Region of York, with consideration for matters such as the equitable distribution of costs and land consumption, development phasing, traffic management, and access requirements.”

More information is requested as to how the City intends to acquire and ultimately implement the new east-west local road along the north boundary of Expansion Area B.

6. Policy 5.3.5 states that

“[...] Final right-of-way requirements will be determined during the review of development applications or through Environmental Assessment processes, where necessary.”

Same comment as above.

7. Policy 5.3.8 states that

“The rights-of-way for new local streets and mews shall be free of all surface and below grade encumbrances, including parking, private utilities, structures, and systems except where the applicant demonstrates, through a justification report, that...”

We request that Staff clarify if this policy applies to private mews as well.

8. Policy 6.5.2 states that

“...All new private residential construction shall strive to be net-zero ready in accordance with the Canadian Home Builders’ Association Net Zero Home Labelling Program or Passive House Standards, and all new industrial, commercial and institutional buildings shall strive to achieve net-zero by 2050. In addition, all applicable development proposals located in Intensification Areas as defined in VOP 2025 shall meet or exceed a minimum performance standard of LEED™ Silver.”

First, we suggest this policy be split into two – those applicable to public buildings and those applicable to private buildings. It is not appropriate to require LEED Silver given it is a proprietary program. The City has its own standards that should be utilized. We suggest that the word “shall” be replaced with “be encouraged to”.

9. Policy 7.1.1 states that

“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.”

Further details should be provided regarding how the City will acquire this amount of parkland, in accordance with the Planning Act requirements.

10. Policy 7.1.7 states that

“Parks shall generally be secured through the plan of subdivision process.”

It is our understanding that Parkland Dedication can also be secured through the Site Plan Approvals process as well as other planning and development mechanisms. Given most of the VMC has already been subdivided we would suggest removal or revision of this policy.

11. Policy 7.2.2 states that

“Urban parks shall meet the following requirements:

- a. Provide a minimum contiguous area of 0.75 hectares;*
- b. Maintain public street frontage along 50% of the park perimeter, distributed across a minimum of two public streets; and*
- c. Include facilities to support both active and passive recreation as determined through the park design process.”*

12. Similarly, Policy 7.2.3 states that:

“Public squares shall meet the following requirements: a. Provide a contiguous area between 0.2 and 0.75 hectares; b. Maintain public street frontage along 50% of the park perimeter, distributed across a minimum of two public streets; and c. Include facilities to support both active and passive recreation as determined through the park design process.”

As mentioned above, we continue to have concerns with respect to the size and geometry requirements for all parks. If you look around the world at great cities, parkland in urban areas is beneficial at a variety of sizes and configurations. These policies may have ill intent on the VMC, and limit creativity and innovation as it relates to providing much needed parks and open space in the VMC. As discussed above and with Staff, we continue to work with Staff to find a suitable alternative approach to parkland in the Portage Lands. The current solution considers an Urban Park under 0.75 hectares in size. We request flexibility in this size of parks anticipated for Urban Parks.

13. Policy 7.2.5 states that

“Further to Policies 7.2.2. and 7.2.3, all parkland proposed for dedication shall meet the following requirements to be deemed acceptable by the City:

b. Maintain a depth-to-width ratio not exceeding 1:4;”

We request that this sub policy be removed based on going discussion with Staff to provide parkland within the Portage Lands.

14. Policy 9.1.5 states that

“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.”

We request further clarity on who is expected to conduct this study or is it sufficient to include an analysis within a planning justification report?

15. Policy 9.1.16 states that

“For any development or redevelopment of lands where sensitive land uses are proposed to be located or are located within 1000 metres of an Employment Area and/or the MacMillan Rail Yard, the Applicant shall be required to undertake a Land Use Compatibility Study. The study shall address the following requirements to the satisfaction of the City, and where deemed necessary by the City, in consultation with CN Rail:

- a. Evaluate potential adverse impacts of noise, vibration, dust, odour, air quality, traffic-related air pollution, and fire and safety hazards posed by major facilities, industrial uses, the MacMillan Rail Yard, a rail line, and/or 400-series highway;*
- b. Evaluate land use compatibility and demonstrate that appropriate separation distances are maintained and that potential adverse impacts are avoided;*

- c. *Where avoidance is not possible, identify mitigation measures to minimize or mitigate such impacts; and*
- d. *Identify if detailed technical studies are required.”*

Almost the entirety of the VMC lands are within 1000 metres of Employment Areas and as such, this requirement is overly enormous considering the sensitive development that has already been constructed in the VMC. We request that this policy be scoped to reflect the Provincial D6 guidelines for Class 3 industries which has a minimum separation distance of 300 metres.

16. Policy 9.2.4 states that

“...To that end, office, retail and service commercial uses shall be required to account for 10% of total gross floor area on all sites within the Mixed Use designation on Schedule G.”

We suggest that this provision is too broad and will be difficult for individual applicants to measure. How does the City intend to monitor this? If the existing VMC does not achieve this target, future developments within the Expansion Area will be overburdened to provide for this. We suggest that this policy be changed from “office, retail and service commercial uses shall be required...” to “development within the VMC shall strive to achieve 10% of total GFA on all sites within the mixed-use designation on Schedule G to comprise of office, retail and service commercial uses.”

17. Policy 9.2.5 provides further requirements on the provision of non-residential GFA which may not capture all nuances of individual development. Additional flexibility is requested to help foster non-residential uses rather than impede them.

18. Policy 9.7.2 states that

“A minimum of 35% of new residential units within the VMC shall be affordable, as defined by the Province. A portion of affordable units shall be accessible for seniors and people of different or varying abilities.”

We are concerned with how the City aims to achieve this metric of affordable units within the VMC. We request clarity on whether the City intends to allow for attainable housing to help meet the goals of Affordable Housing within the Draft OP.

Policies should be expanded to provide more clarification regarding how this can be achieved and incentivizing the provision of affordable housing and rental housing. The City should consider pre-zoning and changes to approval requirements and timelines to expediate construction and reduce soft costs associated with housing. We also note that there are inconsistencies between the VMCS and the VOP, where the VOP specifies “the City will strive to achieve the following...” for the affordable housing goals or requirements. We suggest the VMCS revise the policy accordingly.

19. Policy 9.7.6 states that

“All development that includes a residential component shall demonstrate their contribution to a full range of housing through the preparation of a Housing Options Statement, in accordance with Policy 3.2.2.8 of the VOP 2025.”

The referred subsection no longer exists in the draft VOP 2025. We request that this be deleted.

20. Section 9.9 Built Form Policies:

These policies should remove the absolute metrics and instead define the desired outcome or condition the metric intends to mitigate. There are always a variety of urban design solutions to deal with desired outcomes or mitigate negative impacts of built form and defining those solutions so precisely in the Secondary Plan removes an element of innovation, creativity or spirit of place and generally results in an effect of “sameness” through an area.

21. Policy 9.9.6 states that

“Buildings generally shall be built to a consistent build-to line defined in the Zoning By-law, generally 2-5 metres from the edge of the right-of-way. Maximum and minimum setbacks and build-to lines shall be guided by urban design guidelines for the VMC and shall be included in the Zoning By-law. Front setbacks of up to 5 metres may be appropriate along retail streets, including those identified in Schedule H, to provide an extension of the public realm and accommodate retail displays, street furniture and restaurant patios. In areas that are predominantly residential within each precinct, a setback of generally 3-5 metres from streets and open spaces will provide for front yards, gardens or patios and stairs. Built form adjacent to Parks and Environmental Open Space shall have a build-to line between 3-5 metres to provide appropriate buffering and transition. Along the eastern edge of the Black Creek corridor between Highway 7 and Interchange Way, identified in Schedule I, buildings generally shall be set back a minimum of 3-5 metres from the corridor, with setback distance and design interface guided by the VMC Urban Design Guidelines and subject to review through the development approval process.”

Site design-specific policies with respect to build-to lines are better suited for a zoning by law than in a Secondary Plan. We request specific metrics be removed and the desired outcome be defined.

22. Policy 9.9.25 states that

“Residential towers shall have average floorplates no greater than 800 square metres...”

The in-force VOP 2010 currently permits a tower floorplate size of 850 sq.m. and such request that the current permitted size be maintained.

We thank you for the opportunity to provide input on the Draft VMCSPP and look forward to working with Staff through the process. We reserve the right to provide additional comments on the Draft VMCSPP, and would like the opportunity to discuss with staff, prior to final adoption

and approval of the Vaughan Official Plan and the VMCSPP, as we continue to review the proposed amendment.

Should you have any questions or wish to discuss our comments, please do not hesitate to contact me at 905.513.0170.

Yours very truly,

Malone Given Parsons Ltd.



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Associate

cc *Portage Conversion Landowners Group*