



Project No. 18189-1

June 3, 2025

Committee of the Whole  
City of Vaughan  
Civic Centre  
2141 Major Mackenzie Drive  
Vaughan, ON L6A 1T1

Delivered by email to [clerks@vaughan.ca](mailto:clerks@vaughan.ca)

Dear Chair and Members of the Committee of the Whole,

**Re: Committee of the Whole Public Meeting Report – Item 4.10**  
**Vaughan Official Plan Review**  
**Draft New Official Plan 2025**  
**Block 27 Landowners' Group Considerations**

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We are the planning consultants to the Block 27 Landowners' Group (the "**LOG**") with respect to the 400-hectare tract of land bounded by Keele Street, Teston Road, Jane Street and Kirby Road ("**Block 27**"). We are writing on behalf of the members of the LOG as listed in **Appendix A**.

The purpose of this letter is to provide comments on a recently released May 2025 draft of the Vaughan Official Plan 2025 ("**VOP 2025**"), to be presented at a statutory public meeting before the Committee of the Whole on June 4, 2025.

## **1.0 Summary of Comments**

The primary concern of the LOG is related to the transition provisions proposed in Section 1.4.2. To ensure the orderly and timely implementation of the Block 27 Secondary Plan, we have recommended:

- a) That Block 27 lands be exempted from the VOP 2025; or
- b) That a transition provision be inserted that allows the current policy framework to continue in force and clearly states that VOP 2010 prevails over any part of the VOP 2025 for lands within Block 27.

Details are provided below.

## **2.0 Background**

On behalf of members of the LOG we previously submitted three letters to the City's Official Plan Review Team. The first of these letters is dated November 16, 2023, the second is dated August 1, 2024, and the third is dated April 9, 2025.

In our first letter we summarized the planning work undertaken for Block 27. The work included significant time and effort spent preparing and submitting materials for the Block Plan and Master Environmental Servicing Plan ("**MESP**") based on the policy framework in Volume 1 of the Vaughan Official Plan 2010 ("**VOP 2010**"). In order to preserve that work, we requested that the lands within Block 27 be given an exemption to what had come to be known as the Part A Official Plan Amendment.

In our second letter we continued to request that Block 27 be exempted from what was termed the Comprehensive Draft Official Plan Amendment ("**Comprehensive OPA**"). In the alternative, we recommended a transition policy that recognizes the in-effect Secondary Plan and subsequent implementation work that would be needed to bring development to fruition. Our second letter also provided detailed comments on a number of schedules and policies proposed as part of the Comprehensive OPA.

On August 28, 2024, the LOG received a response from the City to the first letter. In summary, despite acknowledging the work done on the Block Plan under the VOP 2010 framework, Staff were not prepared to support a full exemption for Block 27.

In January 2025, a further draft Official Plan was released, and we submitted our third letter in response. Much as before, we requested that Block 27 be exempted or that suitable transition provisions be adopted, along with detailed comments on various schedules and policies.

In the meantime, the Block Plan process has moved further along. Staff are recommending draft approval of the Block Plan on June 4, 2025. Additionally, two Draft Plan of Subdivision and Zoning By-law Amendment applications have been filed for lands in Block 27. Other landowners are also working towards implementing application submission within the short term. Submission of the second version of the MESP is imminent.

## **3.0 Exemption Request**

We continue to be of the opinion that the lands within Block 27 require an exemption to the VOP 2025. This could be accomplished by inserting either (a) the following provision into the By-law that will enact the VOP 2025:

By-law XXX [insert enacting By-law number] does not apply to the lands bounded by Keele Street, Teston Road, Jane Street and Kirby Road known as Block 27;

or (b) a specialized policy into the VOP 2025.

Without a clear exemption, implementation of the Block Plan faces risks from a mid-stream change in policy, making it much more costly and challenging to bring a planned 7,474 homes and 21,842 people and jobs to the City of Vaughan.

We do not see how complicating the implementation of the Block Plan is in the public interest.

#### **4.0 Realistic Transition**

Though less straightforward, a fair implementation process could be established through a transition policy confirming that VOP 2010, as it read immediately before it was repealed, continues to apply to all lands subject to the Block 27 Secondary Plan. Accompanying policy language would also explicitly confirm that the VOP 2010 prevails over the VOP 2025 to eliminate any interpretive challenges.

We acknowledge the inclusion of Policy 1.4.2.1 in the VOP 2025 which confirms that Volume 1 of the VOP 2010 will remain partially in force. However, its application is limited to only interpretation and implementation purposes of Volume 2 of VOP 2010 (Secondary Plans). This means, if VOP 2010 needs to be relied on for the policies it contains, which provide the backdrop for the entire Block Plan, it cannot be. It can only be used to clarify what the Secondary Plan means.

In the Block 27 context, the approach in current Policy 1.4.2.1 favouring interpretation assistance only is unworkable. For example, it is uncertain what the limits of “interpretation and implementation” are, particularly where there may be competing policies in the VOP 2025 which the policy does not address. Such uncertainty is unfair to members of the LOG as it introduces uncertainty into established planning permissions. Additionally, the relationship between the Secondary Plan and the VOP 2010 goes beyond use of common definitions requiring interpretation upon being implemented. Instead, the Secondary Plan often incorporates entire policies from the VOP 2010 by reference. It is unclear whether policies referred to in such a way would be regarded as important and applied as a whole and in place of policies in the VOP 2025 as a matter of “interpretation and implementation” or if decision makers at the City might, over time, take differing views. Differing views would cause great difficulty in implementing the development of Block 27.

Pursuant to Policy 1.4.2.1 the VOP 2010 will also remain in force for applications that are described in Policies 1.4.2.4 and 1.4.2.6. It appears that the majority of applications required to implement the Block Plan will not be transitioned under Policy 1.4.2.4(a) since to gain this benefit, the applications would already need to have been deemed complete, which is not the case. When it comes to Policy 1.4.2.4(b), respectfully, the intent is unclear. Optimistically, it could mean any application made in the Block Plan area would be subject to VOP 2010 and the Block 27 Secondary Plan, despite the adoption of VOP 2025. However, the wording is not clear about whether the application which needed to be deemed complete between September 7, 2010 and whenever the VOP 2025 is adopted is: (a) the originating official plan amendment (i.e. the application for the Block 27 Secondary Plan), or, (b) the downstream implementing applications.

Alarming, even if transitioned, Policy 1.4.2.7 indicates the intention to repeal transition provisions at the time of the next official plan review or in five years time. It is not anticipated that all of Block 27 will be built out within five years, causing a high level of uncertainty and concern.

Given the scale of investment already made in planning for Block 27, the importance of avoiding procedural setbacks, and the large land area involved, we recommend a transition approach that is not ambiguous, being the addition of the following wording in a new policy 1.4.2.1(c):

c) For the lands subject to the Block 27 Secondary Plan the VOP 2010 shall continue in force and the VOP 2010 prevails over any part of this Official Plan. For further clarity, this Official Plan is inoperative against the lands subject to the Block 27 Secondary Plan.

We ask that the City please confirm that if an exemption is not provided, as set out in the previous section, that at least our proposed policy 1.4.2.1(c) will be implemented prior to Council adoption.

## **5.0 Detailed Comments on 2025 Draft VOP**

The following are additional detailed comments regarding the 2025 VOP.

### **A. Schedule 9A – Street Classification and Street 9B – Street Types**

The street network shown on draft Schedules 9A and 9B does not reflect the latest collector road alignment proposed in the Block Plan and ongoing Municipal Class Environmental Assessment for Block 27.

**We request that the road alignments on draft Schedules 9A and 9B be updated to reflect the Block Plan and Municipal Class Environmental Assessment.**

#### **B. Schedule 9C – Cycling Facilities and Trails**

Similar to our comments above, the on-road cycling facilities and off-road trails shown in draft Schedule 9C does not reflect the latest cycling network for Block 27. Draft Schedule 9C also shows an “Active Transportation Bridge Crossing” over the rail corridor at the Trans Canada Pipeline (“TCPL”) lands. Further, Schedule 9C indicates various small segments of the Planned Primary Network of the Vaughan Super Trail.

As discussed through the Block Plan process, the eastern portion of the Super Trail along the TCPL pipeline is not feasible because the pipeline easement is constrained by three below-grade pipes, leaving limited space for a trail. Due to the property and engineering constraints providing a separate rail crossing at this location for only bicycles/active transportation is not realistic or feasible. Through the Block Plan process, it is also proposed that the north-south leg of the Super Trail will be located through the Greenbelt, but the Schedule now shows various small segments of trails in the “purple” colour which indicate the Vaughan Super Trail.

**We request that the bicycle facility and trail alignments on Schedule 9C be updated to reflect the collector road pattern on the Block Plan and Municipal Class Environmental Assessment. We also request that the Active Transportation Bridge Crossing be removed from Block 27. We further request that the mapping be revised to include only one north-south segment of the Super Trail, which is proposed to be located along the east side of the Greenbelt.**

#### **C. Schedule 10 – Major Transit Network**

Draft Schedule 10 identifies a “Proposed GO Station” in the northeast corner of the Block. The difficulty is, the GO Station is undergoing preliminary study by Metrolinx. Depending on the outcome of that study, the GO Station may not be proposed for this location. **We request that a more accurate label be applied, for example, “GO Station Under Study”.**

#### **D. Section 2.14 – Street Classification and Street Types**

Draft Policy 2.14.1.35 (d) states that minor collector streets shall avoid direct car access to individual dwelling units, whereas Draft Policy 2.14.1.36 states that building frontage on minor collector streets is encouraged. In our opinion, these policy objectives can be contradictory and are incompatible with the Block Plan which provides for some low-rise residential uses on minor collectors. As such, **we request that Draft Policy 2.14.1.35 (d) be deleted.**

#### **E. Section 2.14.2 – A Walkable and Accessible City**

Policy 2.14.2.6 provides that in order to promote increased pedestrian activity and enhance access to transit services and Community Facilities sidewalks are required on both sides of all streets in accordance with City guidelines and engineering requirements. The City's engineering standards include local and other approved public road cross-sections that include sidewalks on one side of the street. **In our opinion, this policy should be deleted.**

Draft Policy 2.14.2.13 requires require short and long-term bicycle parking spaces in all new residential Development and short and long-term spaces in new non-residential Development. This policy is inconsistent with Zoning By-law 001-2021, which does not require bicycle parking for single detached, semi-detached, street townhouses, and other residential development. **We request revising this policy to require bicycle parking in accordance with the Zoning By-law.**

#### **F. Section 2.4.1 – Strategic Growth Areas**

The Transit Hub Centre of Block 27 has been identified as a Strategic Growth Area and a Local Centre on Schedules 1 and 1B. Policy 2.4.1.2(e) prohibits surface parking between the front face of a building and the public sidewalk, except in the case of gas stations, in Strategic Growth Areas.

In our opinion, it may be desirable to provide limited short-term parking or pick-up/drop-off spaces in front of a building in Strategic Growth Areas, **and request rewording to reflect this.**

## **G. Section 2.7 – Natural Heritage Network**

Comments on this section will follow once review is complete.

## **H. Section 3.2 – Land Use Designations**

### *Low-Rise Residential*

The height permissions in the low-rise residential designation are unclear. Draft Policy 3.2.1.1(a) states that building heights shall not exceed three storeys, and (c) permits a variety of building types including “Stacked Townhouse”, which are defined in the glossary with a maximum height of 4 storeys. **We request permitting certain building types up to 4 storeys in height within the Low-Rise Residential designation.**

### *Mid-Rise Residential*

Draft Policy 3.2.1.2 (e) has removed previous permissions in VOP 2010 Policy 9.2.2.3(d) which permitted townhouses, stacked/back-to-back townhouses and low-rise buildings along streets that are not arterial streets or Major Collector Streets. **We request that this permission be reinstated.**

### *Low-Rise Mixed-Use and Mid-Rise Mixed-Use*

Within the draft policies related to the Low-Rise Mixed-Use designation, the intent has shifted from permitting a mixture of uses to requiring a mixture of uses on the same lot.

Draft Policy 3.2.2.2 states that development shall (a) consist of an integrated mix of residential, community and small-scale retail uses intended to serve the local population; (b) permits residential units, together with non-residential uses; and (f) “stand-alone residential uses are not permitted in the Low-Rise Mixed-Use designation, and any residential uses must be in conjunction with one or more additional permitted non-residential uses.”

Block 27 contains approximately 46 hectares of land designated Low-Rise Mixed-Use, the planning of which was based on the intention that some of that area would be developed with commercial and mixed-use buildings, and some would be developed

with higher density forms of low-rise housing though not necessarily both classes of use on each lot. **We therefore request the removal of the prohibition on stand-alone residential uses in policy 3.2.2.2(f). Additionally, for mixed-use areas to succeed, flexibility is critical. By over prescribing the structure of mixed-use areas they may not function at all.**

Further, we note that in the preamble of Section 3.2.2, it states that “Mixed-Use lands require both residential and non-residential uses on the same lot.” **We request that this be removed, or reworded to “encourage” a mixture of uses where appropriate, while clearly allowing for single-use buildings.**

Within the Mid-Rise Mixed-Use policies, we have the same concerns. Policy 3.2.2.3(f) states that stand-alone residential uses are not permitted in the Mid-Rise Mixed-Use designation, and any residential uses shall be in conjunction with one or more additional permitted non-residential uses. **As above, we request that permissions for single-use buildings be reinstated.**

Further, Policy 3.2.2.3(c) requires development within Strategic Growth Areas to incorporate, at minimum, two permitted uses. **We request that this section be reworded to “encourage” a mixture of uses where appropriate, and to permit single-use buildings.**

Draft Policy 3.2.2.3(e) has removed previous permissions in VOP 2010 Policy to permit townhouses, stacked/back-to-back townhouses and low-rise buildings along streets that are not arterial streets or Major Collector Streets (VOP 2010 Policy 9.2.2.4 (f)). **We request that this permission be reinstated.**

#### **I. Section 4.3.1 – The Public Realm**

Draft Policy 4.3.1.3 (c) states: “To prioritize the pedestrian experience on public streets and rights-of-way by: avoiding Rear-Lotting on public streets or other elements of the Public Realm such as parks or natural heritage features and areas.”

In our experience, single-loaded streets are inefficient to construct, and rear-lotting that backs onto public parkland can be difficult to avoid and may be preferred in some cases. **We request that the City consider the following wording: “generally avoiding Rear-Lotting ... where feasible and desirable.”**



Draft Policy 4.3.1.5 (b) states that “Privately Owned Public Spaces [“POPS”] should be designed to a high level of quality and achieve the following: b. be highly visible for pedestrians, with frontage on at least one public street.”

In our experience, it can be desirable to locate a POPS space away from street frontage and provide connection and visibility to that space from a public street through a public access easement. **We request that the City consider the following wording: “be highly visible for pedestrians, with frontage on, or direct access and connection to, at least one public street.”**

#### **J. Section 4.3.3 - Site Design and Building Types**

Section 4.3.3 includes a number of policies that contain restrictive built form metrics including required minimum setbacks, building lengths, angular planes, and tower floorplates. In our opinion, these matters regulate built form too rigidly.

We also note that Draft Policy 4.3.3.8 (“*To ensure permeability between groupings, any given block of Townhouses, Stacked Townhouses, and/or Back-to-Back Townhouses shall have a maximum linear length of 40 metres*”), whereas the current VOP 2010 permits a Stacked Townhouse row to be up to 50 metres (Policy 9.2.3.3).

**We respectfully request that the policies provide guidance only without numerical requirements and if numerical requirements are necessary, add “generally” or “where feasible” to provide flexibility. We also request that the building length be increased to 50 metres, consistent with VOP 2010. In our opinion, the Official Plan should not include such strict and prescriptive requirements, since they do not capture every scenario where it may be desirable to exceed such rigid requirements.**

We also note that for Mid-Rise Buildings, Draft Policy 4.3.3.17, does not permit surface parking between the building’s front or side and a public street.

**It may be desirable to provide limited parking for pick-up/drop-off activities in these locations, or to provide limited surface parking along a portion of an external side lot line. We respectfully request that this policy be reworded to “discourage” surface parking in these locations.**

## K. Section 4.4 - Parks and Open Space

### *Strata Parks*

Section 4.4 contains policies about Strata Parks, which are defined as “A park with horizontal delineation of legal ownership between public and private uses...for example, a public park located on top of a privately owned parking structure.” Based on the definition provided and limitations in Draft Policy 4.4.2.4 (b), the City appears to be indicating that Strata Parks are primarily intended to be located above private parking. We do not see the distinction being made between parking infrastructure and the other kinds of infrastructure listed in Policy 4.4.2.4 (b). All examples provided may be important functional elements of a given building or site. **We request the deletion of this policy.**

Draft Policy 4.4.2.4 (a) (i) limits the total encumbrances to 60% of the surface area of the park. There may be cases where it is desirable to have a Strata Park that has a higher percentage of below-grade encumbrances. **We request that this policy be deleted, or amended to say “limits the total encumbrances to generally 60% of the surface area of the park where below grade encumbrances are deemed to not encumber the surface area of the park...”**

Draft Policy 4.4.2.6 (c) states that, with respect to Strata Parks, “parkland dedication credit shall be calculated net of all encumbrances in accordance with Section 4.5.5 of this Plan.” **We request that this apply to surface encumbrances that displace occupiable space only.** If the entirety of the encumbered area of a stratified park is excluded from parkland dedication credits, there is no basis for creating them.

We are not aware of any policies in the draft VOP 2025 that relate to public parkland provided above a public underground stormwater tank solution. **We request that the City add policies within the Parks and Open Space section to permit innovative parkland solutions including the provision of public parkland above public stormwater infrastructure.**

### *Parks and Open Space Design*

Draft Policy 4.4.4.3 (d) states that parks shall generally be situated and oriented to be highly visible with prominent public street frontage (50% of park perimeter) to enhance passive surveillance. In our opinion, the intent of the policy can be achieved without meeting the 50% park perimeter, and the inclusion of this overly prescriptive policy may result in unnecessary OPAs. Accordingly, **we respectfully request that the**

**policy be revised to remove the reference to “50% of park perimeter” or add “where feasible”.**

Draft Policy 4.4.4.7 (b) states that where development is proposed adjacent to parks or open spaces, development shall “configure building massing and orientation to optimize access to sunlight in parks throughout the day and seasons.” We request that this be **reworded to require development to “minimize shadowing in parks throughout the day and seasons to preserve their utility.”** It may be difficult and potentially undesirable from a built form and intensification perspective to require sunlight in parks to be optimized.

Draft Policy 4.4.4.8 (a)(iii) states that POPS shall have 50 percent minimum perimeter public frontage, of which half shall be public street, and the balance shall include any combination of public realm element, POPS, and/or publicly-accessible street or mews. In our experience, there are desirable configurations of POPS spaces that are accessible and visible from the street but do not have 50% frontage. **We request that this policy be reworted to state that POPS must be visible from and directly connected to a public street.**

Draft Policy 4.4.4.8 (a)(vi) states that POPS shall maintain public street frontage along a minimum of 50 percent of the space’s perimeter, exclusive of private driveways. This policy is similar to draft Policy 4.4.4.8 (a)(iii) noted above. In our experience, there are desirable configurations of POPS spaces that are accessible and visible from the street but do not have 50% frontage. **We request that this policy be reworted to state that POPS must be visible from and directly connected to a public street.**

Draft Policy 4.4.4.8 (a) (vii) states that POPS shall incorporate active ground-floor uses along all building frontages adjacent to the space, with no blank facades, service areas, or other non-active uses permitted along these frontages. In our opinion, this may be an unreasonable requirement in certain configurations. **We request that this policy be reworted to include the phrase “where feasible and desirable”.**

Draft 4.4.4.9 (b) states that POPS receiving parkland credits shall not be included in site area calculations for density purposes. **We request that this policy be removed.** It is inconsistent with the new definition in VOP 2025 proposed for “Floor Space Index”, which is based upon lot area with no exclusions. We note that previously, under VOP 2010, the calculation of FSI was based upon a “net developable area” and excluded parkland and other conveyances.

### *Parkland Dedication*

This section utilizes two new terms: “Net Developable Area” and “Gross Developable Area.” The key difference between the two definitions is that “Net” excludes a variety of environmental features, major infrastructure rights-of-way, and existing uses, whereas “Gross” does not exclude these areas.

Draft Policy 4.4.5.2, which outlines the parkland dedication rates of 5% or 1 hectare of parkland per 600 dwelling units, uses “Net Developable Area”. However, Draft policy 4.4.5.4 which outlines the parkland caps uses “Gross Developable Area”. It is unclear how the Gross vs. Net Developable Area definitions would operate. **We request clarity on the intent of these definitions and policies as we are concerned that the intention may be to attempt to increase the maximum conveyance or payment in lieu beyond that allowed by s. 42(3.3) of the *Planning Act*. Under the *Planning Act*, the “cap” is in relation to land area or value of the land, not the “Gross Developable Area”. Some might incorrectly interpret the reference to “Gross Developable Area” in Policy 3.5.5.4 as removing an appraiser’s discretion over land valuation inclusions and exclusions.**

With respect to the definition of Net Development Area, we make the following requests:

- Incorporate the following exclusion: “major infrastructure rights-of-way and associated environmental and safety buffers and zones.”
- Outline that stormwater management ponds and parks in the Greenbelt Plan area be excluded from “Net Developable Area”. In our opinion, the plan should apply parkland dedication to parkland generating uses, which excludes major infrastructure rights-of-way and lands in the Greenbelt Plan area.
- Incorporate an exclusion for archaeological sites which are mentioned elsewhere in the VOP 2025 as exclusions, but not listed in the definitions and could lead to confusion as a result.

Draft 4.4.5.11 states that parkland conveyed shall be credited net of all encumbrances. **We request that this policy make reference to Policy 4.4.5.8 (which states that POPS may be eligible for parkland credit) as well as the policies relating to Strata Parks.**

### **L. Policies related to Climate Change and Sustainability (Section 4.6)**

Comments on this section will follow once review is complete.

#### **M. Section 4.6.4 – Urban Agriculture**

Draft Policy 4.6.4.1 (b) requires the identification of space for Urban Agriculture through the Secondary Plan and Block Plan processes. We are unsure of how this requirement would be implemented. Is the intention that Park Facility Fit Plans provided at the Block Plan stage include space for Urban Agriculture; or, would spaces for Urban Agriculture be identified on a Block Plan as a separate land use and if so under what provision of the *Planning Act* would such lands be required? **We request that the intent of this policy be clarified.**

Draft Policy 4.6.4.1 (c) requires the identification of space for Urban Agriculture in new residential development. **As above, we request that this policy be clarified.** For example, can this be achieved through the presence of back or front yards? Further, it is our opinion that there may be new residential development that is inappropriate for Urban Agriculture.

#### **N. Section 4.7.3 – Stormwater Management**

We understand that the City has been exploring opportunities to permit public stormwater ponds below grade, particularly below public parkland. **We suggest adding the following policy: “To encourage the implementation of innovative stormwater management approaches, such as below-grade solutions including below public parkland, in accordance with City policies and procedures.”**

#### **O. Section 5.1.1 – Detailed Planning**

##### *Block Plan*

Having reviewed the policies pertaining to Block Plans, we are concerned about the timing for their preparation in the instances that they may be needed. We suggest that clarification be added pertaining to the City’s expected procedure. It is also unclear whether block plans are a separate process or will be incorporated into the site-specific development applications as they come forward, resulting in an iterative block planning

process. We suggest that a policy or policies clarifying this be added. In addition, clarification should be added regarding whether Council endorsement of block plans is required under VOP 2025.

Policy 5.1.2.1 contains internal contradictions about who the proponent of a Block Plan is (i.e. a proponent or a group) which need to be resolved. Further, it is unclear whether a Council-endorsed Block Plan would apply only to a proponent's land, as the details on remaining lands are "conceptual".

We also have a concern about the interaction between Block Plans and Plans of Subdivision which is part of the subject of Policy 5.3.1.31. This policy refers to "conditions" of a Secondary Plan or Block Plan being satisfied before a Plan of Subdivision can be approved. Block Plan conditions, if applied by the City, are not grounded in statutory authority, unlike conditions of subdivision. We are concerned that impossible conditions could be imposed through a non-statutory process and used to defeat subdivision applications. Policy 5.3.1.31 also purports to require a plan of subdivision to "conform" with a Block Plan, which presents a similar issue. **We request this policy be updated to better reflect what is meant by conditions and disentangle statutory and non-statutory processes.**

Additionally, throughout the VOP 2025, there are references to items that may be required as part of a Block Plan process, including a review of cultural heritage and archaeological resources (4.10.2.4), identification of urban agriculture (4.6.4.1), and community energy plans (4.6.2.3). These items are not directly referenced in Section 5.1.2. **We request that Section 5.1.2 be updated to clarify all of the items that may be required as part of a Block Plan process.**

**In summary, we request that VOP 2025 and particularly Section 5.1 be updated to clarify the purpose, intent and role of a Block Plan, and clearly outline the process and requirements. Further, if the role and scope of Block Plans are being reduced to an applicant-led requirement of a subdivision application that only conceptually delineates development on lands not owned by the proponent, we request that the City consider removing the requirement for Block Plans altogether.**

#### **P. Section 5.1.3 – Implementation Tools**

Draft Policy 5.4.2.2 outlines items that may be required as part of a complete application and includes Table 5.1 which lists information, reports, studies, and materials.

We request a number of changes to Table 5.1:

- We request renaming the title of Table 5.1 to remove the word “required.”
- We request removing “Executed and Valid PAC Understanding” and “Executed Preapplication Understanding” as this item cannot be required as part of a complete application.
- We request correcting the alphabetizing of certain items.
- Some of these items say “where applicable” (such as Architectural Control Architect Approved Drawings), but this is inconsistently used. Many of these items are required “where applicable”. We request that a consistent approach be applied.
- Some items listed under “other” are not materials, rather, they are instructions about how to submit items, such as “all files shall be labelled in accordance with the City of Vaughan’s standard nomenclature”. We request these be removed.

Policy 5.4.2.4 should be deleted as it mimics the complete application provisions of the *Planning Act*, but in an incomplete way, which may give rise to disputes.

Draft Policy 5.4.2.7 states that “where a study has been submitted in support of a development application(s), and it is determined that a peer review is required, the peer review shall be coordinated by the City and undertaken by a peer reviewer retained by the City, but at the expense of the applicant. This would be required as a component of a complete application.” In our opinion, it is not appropriate to delay the processing of an application by preventing an application from being deemed complete due to the City’s lack of expertise to review a certain report. The complete application requirement is to confirm that required materials have been submitted to begin with. It is not a process intended to intricately assess the adequacy of the submission; such a process would result in unfair delays. **We request that this be reworded to remove the sentence requiring the peer review as a component of a complete application.**

#### **Q. Glossary**

The definition of “Townhouse” (“A Low-Rise Residential building, up to three storeys in height, situated on a single parcel and part of a row of at least three, but no more than six, attached residential units”) is unnecessarily restrictive. **We request that the definition be updated to permit “generally no more than six” units, or utilize a metric length.** Further, we question whether it is appropriate to require a townhouse to be on a “single parcel” as this might create issues with condo vs freehold units.

The definition of “Back-to-Back Townhouse” refers back to the Townhouse definition. Would this mean that the six-unit limit, when applied to Back-to-Back Townhouses, would result in 6 units per building and 3 units per row? **We request this be clarified.**

#### **6.0. Concluding Thoughts and Next Steps**

Thank you for the opportunity to provide input into this important policy change. Should you require additional information or clarification, please contact the undersigned at 416-418-5422 or via e-mail at [dfalletta@bousfields.ca](mailto:dfalletta@bousfields.ca).

Respectfully Submitted,

**Bousfields Inc.**



Anna Wynveen, MCIP, RPP

AW:jobs

c.c. *M. Ghassan, Delta Urban Inc., via e-mail*  
*Fausto Filipetto, Official Plan Review Team, City of Vaughan, via email*  
*Cameron Balfour, Senior Planner, City of Vaughan, via email*  
*Andrew Haagsma, Planner I, City of Vaughan, via email*

*List of attachments:*

*Appendix A – Legal Entities*



## APPENDIX A

Block 27 Landowners Group Inc.	
Entities	Common Name
BW Teston Inc.	ARG Group Inc.
Ferrara Glade Investments Inc. Heathfield Construction Ltd.	Armland Group Armland Group
West Jane Developments Inc.	DG Group
Prestige Rentals Inc.	Di Poce Management Ltd.
Gold Park (Maple Inc.) Rosehollow Estates Inc.	Gold Park Gold Park
Keltree Developments Inc.	Keltree
Lormel Developments Ltd.	Lormel Homes
Gusgo Holdings Ltd.	Nideva Properties Inc.
Alderlane Estates Inc.	Royal Pine Homes
2640131 Ontario Inc.	Southbrook Homes
Teston Woods Development Corp.	State Building Group
Palmira Battistella	Private Owners
Di Biase, Adrian; Di Biase, Kristina; Di Biase, Stephen; La Posta, Erika; La Posta, Andrea;	Private Owners