



BOUSFIELDS INC.

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Communication

Council – June 24, 2025

CW(PM) – Report No. 24 Item No. 10

Delivered by email to: oprmanager@vaughan.ca

Re: Comments on Draft Vaughan Official Plan 2025
2-28 Simcoe Street, 49-51 Railway Street and 2100 Major Mackenzie Drive
West, City of Vaughan

Bousfields Inc. is the planning consultant for Bader Group Inc., with respect to the lands located on the west side of Simcoe Street, north of Major Mackenzie Drive West, municipally known as 2-28 Simcoe Street, 49-51 Railway Street, and 2100 Major Mackenzie Drive West in the City of Vaughan (the “subject site” or “site”).

We are writing on behalf of our client with respect to the 2025 Vaughan Official Plan Review, specifically, the latest draft that was released in May of 2025 for public review and comments (the “2025 Draft OP”). We have reviewed the 2025 Draft OP text and schedules and are writing to express our comments and requests with respect to the subject site. The findings and analysis as set out in our comment letter, dated May 21, 2025, with respect to the January 2025 City of Vaughan Draft Official Plan, continue to be relevant and are to be supplemented by this letter.

Subject Site and Area Context

The subject site is approximately 7,896 square metres in size, and is located on the north side of Major Mackenzie Drive West, west of Simcoe Street (see **Figure 1, Aerial of Subject Site**). The site is currently occupied with 8 single detached residential dwellings.

Directly north of the subject site, on the north side of Railway Street, is a residential neighbourhood predominantly comprised of single-detached and semi-detached dwellings. The neighbourhood extends north to McNaughton Road.

To the east of the subject site, east of Simcoe Street is the railway corridor associated with GO Transit (Barrie Line). To east of the rail corridor is the Maple GO Station which provides higher order transit service on the Barrie Line between Union Station and Allandale Waterfront. The closest entrance to Maple GO Station is located approximately

150 metres east of the subject site and has direct pedestrian access via a walkway that straddles the rail corridor along Major Mackenzie Drive West. Surrounding the Maple GO Station, is a mixed-use community comprised of low-rise, mid-rise and high-rise buildings. The tallest buildings are situated on the north side of Eagle Rock Way, approximately 280 metres northeast of the subject site.

To the immediate south of the subject site, on the south side of Major Mackenzie Drive West, are various civic and institutional buildings including Vaughan City Hall (2141 Major Mackenzie Drive West) and Civic Centre Resource Library (2191 Major Mackenzie Drive West), To the south of the institutional uses is a low-rise residential neighbourhood that extends south to Rutherford Road.

Directly west of the subject site are low-rise residential uses, predominantly comprised of single-detached dwellings. The residential uses extend west to just east of Keele Street. The properties fronting on Keele Street are comprised of one- to two-storey commercial uses.

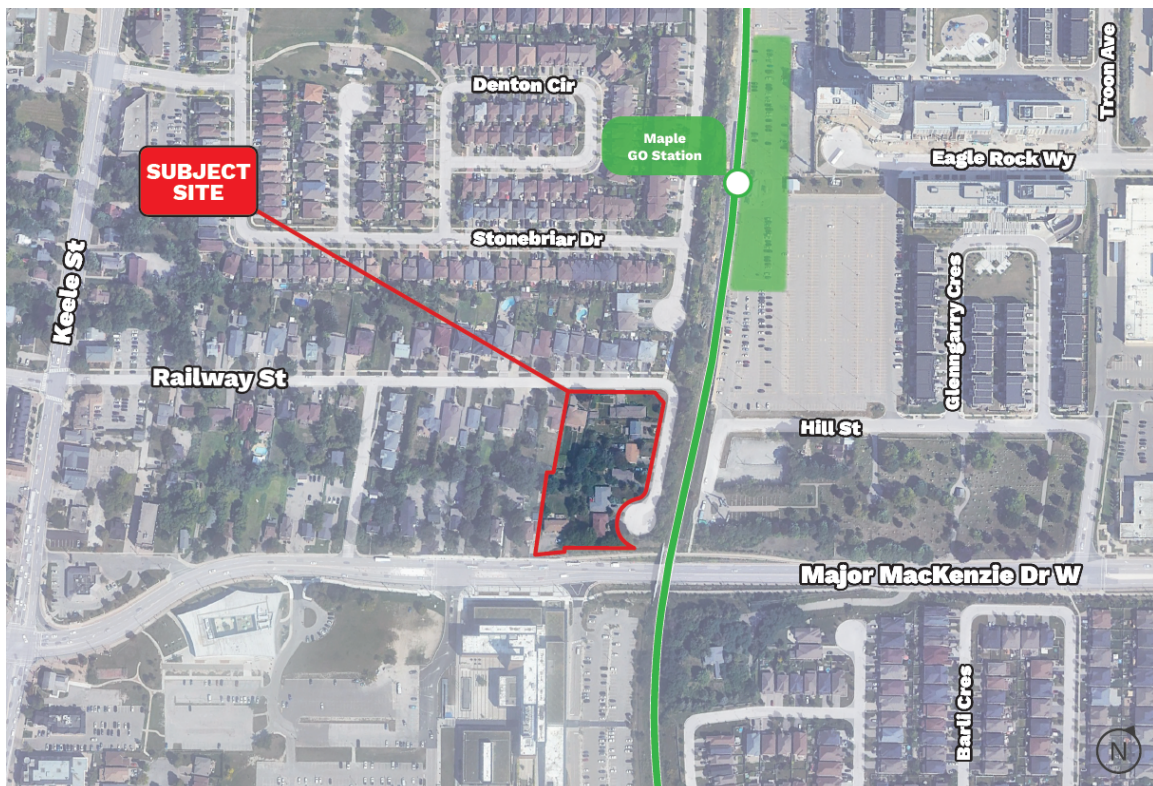


Figure 1 – Aerial of Subject Site

Applicable Policy Context

With respect to the subject site's current land use planning context, the York Region Official Plan designates the site as a *Community Area* (Map 1A – Land Use Designations), and the City of Vaughan 2010 Official Plan identifies the site as being located with a *Community Area* along a *Primary Intensification Corridor* (Schedule 1 – Urban Structure).

The City of Vaughan May 2025 Draft Official Plan identifies the site as being located within a *Strategic Growth Area* along a *Local Corridor* (Schedule 1B – Strategic Growth Areas). On Schedule 13 (Land Use), the Official Plan designates the site as *Low-Rise Residential*, which prescribes a maximum height of 3-storeys and a maximum density of 1.25 FSI.

Additionally, the subject site is located immediately adjacent to the Maple GO Protected Major Transit Station Area (PMTSA). Maple GO Station (PMTSA 62) requires a minimum density target of 150 people and jobs per hectare, and a minimum density of 0.8 FSI. As noted below, while the site falls immediately outside of the Maple GO PMTSA, it is our opinion that it is located within an area that is intended for higher-density intensification in accordance with provincial direction.

Vision for the Subject Site

The proposed vision is to redevelop the subject site with a transit-oriented, mid-rise residential building that appropriately responds to the existing and proposed built form context in the surrounding area, in particular, in an area adjacent to the Maple GO Station. The proposed intensification in the form of an apartment building would also contribute to diversifying the housing stock in the City of Vaughan.

Comments and Requests on May 2025 Draft OP

1. General Comments

We agree with the general direction of the Draft Official Plan, particularly the focus on intensification within Strategic Growth Areas and Protected Major Transit Station Areas (PMTSAs), as well as the emphasis on increasing housing supply and the protection of environmental features. However, it is our opinion, as outlined below, that the City should be cautious against adopting policies that are overly prescriptive or rigid. While clear guidelines are essential for development and growth, too rigid an approach may unintended consequences for development.

With respect to the schedules, the Draft Official Plan introduced several notable changes. For instance, the renaming of “Primary Intensification Corridor” to “Local Corridor” and “Regional Intensification Corridor” to “Primary Corridor” on Schedule 1B (Strategic Growth

Areas) have reduced redundancy and confusion between the two types of Strategic Growth Areas. Additionally, the inclusion of the right-of-way widths for Major Arterial Roads on Schedule 9B (Street Types) is helpful to avoid cross-reference with the York Region Official Plan. To further enhance ease of use and clarity, it is our opinion that street labels should be consistently used throughout all of the schedules.

2. Proposed Land Use - Schedule 13

The subject site is proposed to be designated *Low-Rise Residential* on Schedule 13 – Land Use Designations in the May 2025 Draft OP. As set out below and as outlined in our previous comment letter, we request that the subject site be designated as *Mid-Rise Residential* on Schedule 13 for the reasons noted below (see **Figure 2, Schedule 13, Land Use Designations**).

Policy 2.2.2.2(a) of the 2025 Draft OP provides that development is encouraged to occur first in Strategic Growth Areas that are currently served by public transit, in the following order: subway, bus rapid transit, GO train, and bus (our emphasis). The subject site is located immediately adjacent to the GO Transit (Barrie Line) railway corridor, and approximately 150 metres west of the closest entrance to Maple GO Station. Maple GO Station (PMTSA 62) requires a minimum density target of 150 people and jobs per hectare, and a minimum density of 0.8 FSI.

It should be acknowledged that while the site is not located within the delineated Maple Protected Major Transit Station Area (PMTSA) as identified on the York Region OP and the 2025 Draft OP, the site meets the definition provided within the Provincial Planning Statement (2024), which directs that Major Transit Station Areas are the areas generally within an approximate 500 to 800-metre radius of an existing or planned higher order transit station. Given the subject site's location within 150 metres of the Maple GO PMTSA, it is our opinion that it is an area that is intended and appropriate for higher-density intensification in accordance with provincial direction and should be compatible with the minimum density targets as outlined above.

With respect to the emerging planning and regulatory framework, the subject site is identified as a "Strategic Growth Area" as per Schedule 1 – Urban Structure of the Draft Official Plan, and specifically, along a "Local Corridor" (Major Mackenzie Drive West) as per Schedule 1B – Strategic Growth Areas. In accordance with Policies 2.1.2.1 and 2.2.1.1 of the Official Plan, Strategic Growth Areas are the primary locations for accommodating intensification. Schedule 1 establishes a hierarchy of Strategic Growth Areas in descending order of density, building height, and intensity of use, including the Vaughan Metropolitan Centre, Primary Centres, Primary Corridors, Local Centres, and Local Corridors. Local Corridors are planned to accommodate intensification in the form of mixed-use Mid-Rise Buildings, limited mixed-use High-Rise Buildings, and Low-Rise

Buildings. **Accordingly, it is our opinion that the *Mid-Rise Residential* land use designation would be appropriate for the subject site, as it is located within a Strategic Growth Area, and Local Corridor (Major Mackenzie Drive West), which are specifically targeted for higher-density, mixed-use development and growth.**

In addition to being recognized as a “Local Corridor” on Schedule 1B, Major Mackenzie Drive West is also identified as a “Major Arterial” on Schedule 9B – Street Types of the Draft Official Plan. As noted in Section 2.14 of the Draft Official Plan, arterials are the location for nearly all Strategic Growth Areas, play an important role in moving large volumes of traffic, and will be the primary location for rapid transit service. Accordingly, Major Mackenzie Drive West is an appropriate location for intensification in the form of *Mid-Rise Residential* development.

Abutting the subject site, Major Mackenzie Drive West has a Regional Planned Street Width of up to 36 metres on Map 11 (Street Network) of the Region of York 2022 Official Plan, as well as on Schedule 9B of the Draft Official Plan. The existing right-of-way width of the subject site ranges between approximately 36.5 metres along the western portion of the subject site adjacent to 2100 Major Mackenzie Street West and up to 47.5 metres along the eastern portion of the subject site adjacent to 2 Simcoe Street.

With respect to the existing site context, it is our opinion that the *Mid-Rise Residential* land use designation would be compatible with and provide appropriate transition to the abutting land uses. In particular, the surrounding land uses include *Low-Rise Mixed-Use* lands to the west, *Major Institutional* lands to the south, *Mid-Rise Residential* lands to the southeast, *Private Open Spaces* to the east, *Mid-Rise Mixed-Use* lands to the northeast, and *Low-Rise Residential* uses to the north. The *Mid-Rise Residential* land use designation, which permits buildings up to 12-storeys in height, would be appropriate for this area, provided that new development is designed with a pedestrian-scale podium, including appropriate setbacks and setbacks, that would incorporate appropriate transition of intensity, scale, and use to surrounding properties. In addition, given the significant right-of-way width along Major Mackenzie Drive, the subject site presents an ideal candidate for mixed-use, mid-rise intensification.

Given the surrounding site and planning policy context outlined above, it continues to be our opinion that a *Mid-Rise Residential* land use designation would be appropriate for the subject site. **We request that the subject site be designated as *Mid-Rise Residential* on Schedule 13 of the new 2025 Vaughan Official Plan.**

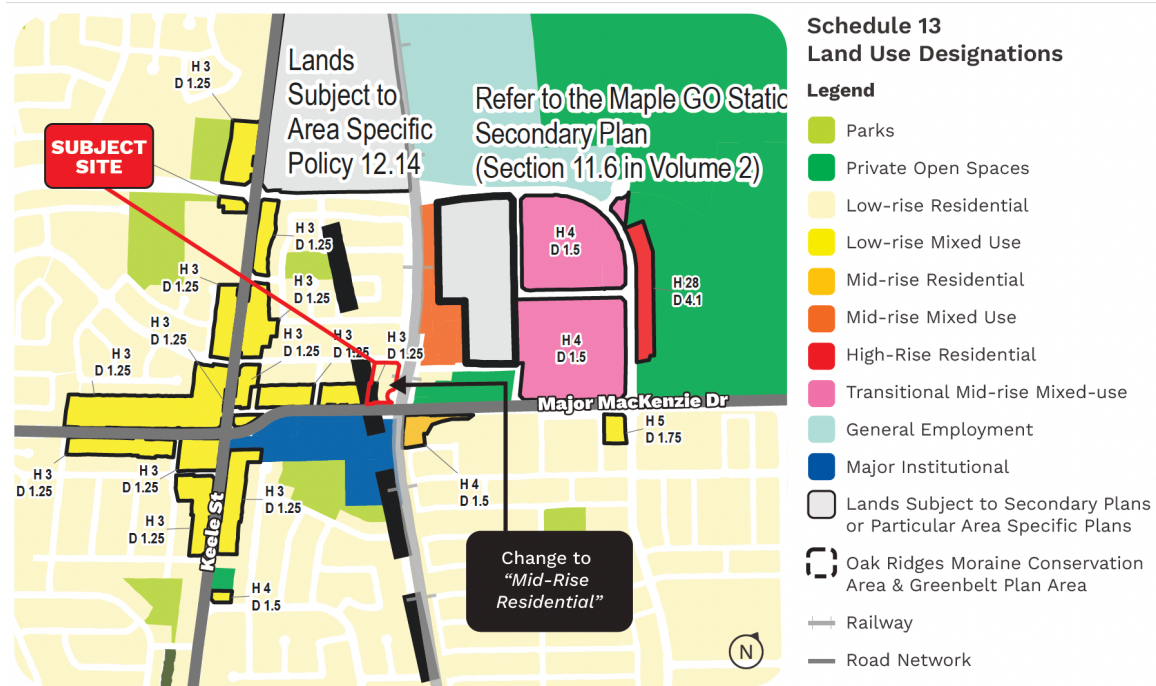


Figure 2 – Schedule 13, Land Use Designations

3. Angular Plane Requirements

Policy 4.3.3.9 of the Draft Official Plan provides that in order to provide appropriate privacy and daylight/sunlight conditions for any adjacent house form building on a lot that abuts a lot with an existing Single-Detached House, Semi-Detached House or Townhouse, the entirety of a Mid-Rise Building “shall be contained” within a 45-degree angular plane measured from the property line abutting those house form buildings that are designated *Low-Rise Residential*.

As outlined below, it is our opinion that the proposed application of the 45-degree angular plane (and other such numerical standards) is overly rigid in a policy document. A more appropriate approach would be to prescribe urban design objectives or criteria that “generally comply” with a 45-degree angular plane.

In this respect, there are other ways to minimise built form impacts on adjacent uses which are contained in the built form policies for Mid-Rise Buildings specified in Policies 4.3.3.10 and 4.3.3.11, including the requirements for a pedestrian-scaled podium or other architectural articulation to be two to six storeys in height, and the requirement for building elements above the podium to be set back three metres along all street frontages, are sufficient to regulate the built form of mid-rise buildings and ensure that appropriate transition in scale and use is provided between mid-rise buildings neighbouring properties.

The application of a 45-degree angular plane is unnecessarily prescriptive and may have unintended consequences on the efficiency and outcomes of development, as described below.

The City of Toronto Mid-Rise Building Performance Standards (2010) is among the most well-known examples of the unintended constraints posed by rigidly applying the 45-degree angular plane, and similar numerical design standards, to the development of mid-rise buildings. The application of many performance standards within the Guidelines, in particular the required rear transition requirements to *Neighbourhoods* and *Parks*, placed a significantly greater weight on urban design considerations at the expense of policies promoting transit-supportive intensification and the creation of new housing supply, especially within “strategic growth areas.” In many instances, the resulting built form (even in cases where buildings did not meet every recommended performance standard) was less economical to build, less efficient, and less environmentally sustainable than a building with fewer stepbacks and more consistent floor plates. The front and rear angular planes in particular provided for highly terraced built form which brought challenges in accommodating functional double-loaded corridors with appropriately sized and shaped units, particularly at the upper levels of mid-rise buildings and on shallower lots.

To respond to these unintended consequences, in December of 2024 the City of Toronto Council adopted the updated 2024 Mid-Rise Building Design Guidelines that include several key changes including removing the application of both the front and rear angular planes. These changes are intended to simplify construction and make buildings more economical to build, while also providing for appropriate built form relationships and fit within the existing and planned context of a development site. It is our opinion that similar to the City of Toronto, performance standards that require certain setbacks and stepbacks to ensure appropriate building massing should be provided in a guideline document, rather than prescribed within the City of Vaughan Official Plan.

Given the context above, we request the modification of policies from the Draft Official Plan regarding the application of front and rear angular planes, which are unnecessarily prescriptive and have unintended consequences for development. As noted above, it is our opinion that the other built form criteria for Mid-Rise Buildings specified in Policies 4.3.3.10 and 4.3.3.11, are sufficient to ensure that appropriate transition in scale and use is provided between mid-rise buildings neighbouring properties, and that any further specifications regarding built form should be included within a guideline document.

4. Ground-Floor Retail Uses in Historical Villages

Policy 4.2.4.4 of the Draft Official Plan requires that infill development along arterial streets and collector streets in the historic villages “shall include” ground-floor oriented Retail uses and incorporate design guidance from the Vaughan City-Wide Urban Design Guidelines

to ensure the new development is sensitive to the existing context of the village. In this regard, the subject site is located within the Village of Maple Heritage Conservation District, as shown on Schedule 14B, and is located along Major Mackenzie Drive West, which is identified on Schedule 9B as a Major Arterial Road with a planned right-of-way width of 36 metres.

It is our opinion that the proposed requirement for ground-floor oriented retail uses in arterial streets and collector streets in the historic villages is overly rigid in a policy document. A more appropriate approach would be to indicate that ground-floor oriented retail uses “should” or “are encouraged to” be provided within infill development along arterial streets and collector streets in the historic villages. It is our opinion that the inclusion of retail uses should be evaluated on a site-by-site basis due to the unique constraints and characteristics of each location. For instance, there is a significant grade difference on the subject site along Major Mackenzie Drive West that would make retail uses unviable due to visibility and accessibility concerns. As noted above, a mid-rise residential built form would be more appropriate for the subject site.

Given the context above, we request the modification of policies from the Draft Official Plan regarding the requirement for ground-oriented retail uses in arterial streets and collector streets in the historic villages, which are unnecessarily prescriptive and may not be appropriate for all sites within the villages. As noted above, it is our opinion that the inclusion of ground-floor oriented retail uses should be carefully considered on a site-by-site basis due to the distinct characteristics of each location.

Conclusion and Next Steps

As outlined in this letter, we request the above-noted policy and schedule changes to the 2025 Draft OP to provide for residential intensification within the subject site, and to optimize the use of underutilized lands within the built-up area, which have access to existing and planned infrastructure and public service facilities, including public transit.

We understand that the next draft of the Official Plan will be proceeding to a statutory Public Meeting on June 4, 2025, and is targeted for adoption at a Council meeting in the fall of 2025. We appreciate the opportunity to provide comments and kindly request a meeting with your team to discuss our comments and requests in further detail at your earliest convenience.

Should you require any additional information please do not hesitate to contact the undersigned.

Respectfully Submitted,

Bousfields Inc.

Tony Volpentesta

Tony Volpentesta, MCIP, RPP

cc: *Robert Bader, Bader Group Inc.*