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June 3, 2025

City of Vaughan
Vaughan City Hall, Level 200
2141 Major Mackenzie Dr.
Vaughan, ON L6A 1T1

Attn: Mr. Fausto Filipetto

Dear Mr. Filipetto:

**RE: Comments on the New Draft Vaughan Official Plan 2025
9 – 31 Dorian Place and 8260 Yonge Street/5 Dorian Place, Vaughan
Dorian Place Limited Partnership**

Goldberg Group are the Planning Consultants for the Dorian Place Limited Partnership on behalf of a group of Owners listed in Appendix '1' to this letter, and representing an assembly of seven (7) existing lots of record, known municipally in 2025 as 8260 Yonge Street/5 Dorian Place, and 9, 15, 19, 23, 27, and 31 Dorian Place, and is legally identified as 'Lots 1, 2, 3, 4, 5, 6, 7, 8 and 9, Plan M-1907' (the '**subject site**').

On behalf of our Client and the Owners, we have previously provided comments with respect to the January 2025 Draft of the Vaughan Official Plan (the "**VOP**"). Further, applications to facilitate the redevelopment of the subject site have been submitted to the City, which are presently being reviewed for 'completeness'. We are pleased to see that several of our prior comments have been addressed in the May 2025 Draft VOP, including the removal of the subject site from the *Established Large-Lot Neighbourhood* areas delineated on Schedule 1C.

Additionally, since our prior submission on this matter we have filed applications with the City to facilitate the redevelopment of the subject site with a high-density, mixed-use built form. These applications are presently being reviewed for 'completeness'.

We appreciate the opportunity to review and provide further comments on the updated May 2025 Draft of the VOP. On behalf of our Client and the Owners, our comments are provided below:

Schedule 1.B.5: Protected Major Transit Station Areas #17, #18, #19, and #20

The York Region Official Plan identifies the subject site within Protected Major Transit Station Area (PMTSA) No. 19 associated with the Royal Orchard Subway Station, however the label for this map on Schedule 1.B.5 incorrectly identifies it as the 'Clark Subway Station' PMTSA (No. 18).

Section 1.4.2: Transition

The applications submitted on behalf of our Client will likely be deemed complete prior to approval of the VOP, and thus would be subject to the Transition provisions of **Policy 1.4.2.4**. Notwithstanding this, we note that **Policy 1.4.2.7** outlines that this transition policy is intended to be repealed at the earlier of the time of the next Official Plan review, or 5 years. We do not understand the rationale for this intention.

Section 2.4.5: Primary Corridors and Local Corridors

The subject site is located within a *Primary Corridor*, a Strategic Growth Area (SGA), in addition to the Royal Orchard Subway Station PMTSA (No. 19). The site is also subject to the Yonge-Steeles Corridor Secondary Plan (the “**YSCSP**”). We support the provision of **Policy 2.4.5.2** which confirms that the higher density target of either the VOP or YSCSP apply, however suggest this should also include the minimum targets ascribed to PMTSAs as well. This would result in improved ease of reference and consistency with **Policy 2.4.6.5**. In this regard, a conversion protocol should be explored to allow ease of comparison between the ‘floorspace index’ (FSI) or units per hectare (UPH) typically utilized within the VOP, and the ‘persons and jobs per hectare’ utilized for PMTSAs.

Accordingly, **Policy 2.4.5.3** and **Table 2.2** apply with respect to minimum density and combined population and jobs per hectare. We request clarification as to whether the provisions of this PMTSA delineation will result in further amendments to the Yonge Corridor Secondary Plan. Of note, the policy framework for the subject site within the Secondary Plan was established prior to the delineation of the PMTSA within the York Region Official Plan.

With respect to transition, we would like to comment on the following policy:

Policy 2.4.5.3(f): *That Primary Corridors and Local Corridors outside of Employment Areas shall be planned to: be designed and developed to implement appropriate transition of Intensification and use to surrounding Community Areas, and/or separation from adjacent Employment Areas.*

The lands to the west of the subject site are identified as *Community Areas*. As mentioned in our previous letter, while we acknowledge that a form of transition is required to ensure a harmonious relationship between lower density residential areas and the more intensive development to occur along such a corridor, we suggest that it must be recognized that a ‘transition’ can take many forms, and does not necessarily mean a reduction in height or density.

We continue to suggest that the City must recognize and accommodate the limited lands available abutting Yonge Street in the planning for SGAs and PMTSAs by explicitly stating in the VOP that the existing context must, and will, change to achieve the required density targets of these areas. The ability to achieve the envisioned *compact built form at transit*

supportive densities may not be viable if strict adherence to existing context is promoted above all else.

In this regard, we suggest that the City consider a 'transition zone' for areas adjacent to lands within the PMTSAs and/or along Primary Corridors. In our opinion, this would help to allow a more gradual reduction in intensity rather than placing the onus entirely upon lands with frontage along Primary Corridors (resulting in potential loss of opportunity for floor area and housing), and may facilitate greater areas for 'missing middle' built form proximate to existing and planned higher order transit.

This comment applies also to the provisions of **Policy 2.4.1.1**.

Section 2.4.6: Major Transit Station Areas

We request clarification with respect to how the Gross Minimum FSI for PMTSA 19 was determined.

Further, we suggest that refinement is required to the interplay between **Policy 2.4.6.5** and **Policy 2.4.6.6**. These policies state:

- **Policy 2.4.6.5:** *That on lands where a Protected Major Transit Station Area overlaps with an existing or planned Strategic Growth Area, Secondary Plan Area, or Area-Specific policy that defines minimum density targets, the higher of the gross minimum density target applies.*
- **Policy 2.4.6.6:** *That within a Protected Major Transit Station Area, the applicable schedules, policies, and designations of this Plan, including any Secondary Plan forming part of Volume 2 of this Plan, shall apply and shall determine the permitted land uses and built form in the area including **maximum** heights and **site densities**. [emphasis added]*

While it is clear that the higher minimum density target applies, review should be undertaken to ensure that the maximum density which may exist in a Secondary Plan provide an appropriate range above the minimum target to reasonable facilitate development activity to achieve the growth management goals of the VOP. Similarly, as previously recommended a conversion protocol should be explored to allow ease of comparison between the 'floorspace index' (FSI) or units per hectare (UPH) typically utilized within the VOP, and the 'persons and jobs per hectare' (ppj/ha) utilized for PMTSAs.

An example would be an instance where a PMTSA has a minimum target of 200 ppj/ha, but an aged Secondary Plan prescribes a maximum density of 1.5 FSI. For the purposes of this exercise, if one were to consider that 200 ppj/ha equates to 1.4 FSI, we suggest that it is unreasonable to permit development to occur only within a 0.1 FSI increment, and would only serve to require unnecessary planning applications which delay the delivery of housing and growth.

Section 3.1.1: General Land Use Policies

We suggest that there is a general need to review all Secondary Plans to ensure consistency with the VOP with respect to permitted building types in order to both ensure that new and evolving built form and housing types are permitted, and to recognize the evolution of building practices. This would be consistent with the stated intent of the VOP to add a greater range of housing types and sizes to the City, while also avoiding the potential need for costly and time-consuming site-specific development applications.

This comment would similarly apply with respect to consistency with **Section 4.3.3** (Site Design and Building Types).

With respect to maximum densities, we would like to comment on the following policy:

Policy 3.1.1.5: *That where no height or density is indicated on Schedule 13, the maximum height and density shall be established through a Secondary Plan or Area-Specific policy and pursuant to the policies of Section 5.1 of this Plan, or through the application of policies of this Plan.*

While this policy is not specifically applicable to the subject site given it is identified within a Secondary Plan area, we suggest that exceptions/exemptions from heights or densities identified on Schedule 13 should be provided where certain matters of Municipal or Provincial interest are provided, which may include:

- Rental or Affordable Housing;
- Publicly accessible open space;
- Publicly available parking;
- Floor area for school, community centres, daycares, or other institutional uses as part of a mixed-use development;
- Enhanced sustainability, renewable energy, or 'green' development standards; or
- Other matters, as may be determined through agreement with a landowner/proponent and the City.

Section 3.2.2: Mixed Use

Through our Client's applications, it is contemplated that the High-Rise Mixed Use designation would be applied to the subject site. While the lands are subject to the YSCSP, we provide the following comments related to the Land Use provisions provided in the VOP given they are more current than those in the Secondary Plan, and would thus logically serve as the basis for any updates to same.

We request clarification with respect to the intent of **Policy 3.2.2.5(a)(iii)** which provides that development shall "...be integrated with adjacent uses;". Additionally, we suggest the reference in Policy 3.2.2.5(c) is in error, and should refer to **subsection (b)**.

Development within Strategic Growth Areas shall be required to incorporate, at a minimum, two of the permitted uses (that provide residential and non-residential uses on the same lot), listed in policies 3.1.1.7 and 3.2.2.5.c., subject to the provisions of the City's Zoning By-Law; [emphasis added]

We also have reviewed the definition of a High-Rise Building, being: *A building over twelve Storeys in height with a range of heights and densities **appropriate for the surrounding context pursuant to Schedule 13 of this Plan, applicable Secondary Plans, and the Zoning By-law.** May include buildings intended for both residential and non-residential uses.*

We request that this definition be revised to focus solely on the elements that differentiate this built form. Reference to context and permissive policy should be contained within the body text of the VOP. For convenience, we have added **emphasis** to the elements of the definition that we feel are inappropriate for inclusion in the definition. This comment would also apply to **Policy 4.3.3.1**.

Section 4.1.1: Housing Affordability

We reiterate our prior comments related to affordable housing outlined in **Policy 4.1.1.1**.

We suggest that requiring a minimum of 35% of all new units within a PMTSA to be affordable, while laudable, is inconsistent with the recent amendment to Ontario Regulation 232/18 which stipulates that the maximum number of units that can be required to be set aside as affordable within a PMTSA is 5% of the total number of units, or gross floor area (not including common areas).

Given that the Planning Act does not permit a Municipality to require the provision of affordable units outside of a PMTSA, we question how the City will implement an Inclusionary Zoning (IZ) framework for the balance of the City.

Similarly, were this target to be legally implemented, it would exceed the ultimate requirements of the IZ policies for the strongest market area adopted by Council for the City of Toronto, which are to be phased in over the course of several years. Given the uncertainty inherent in the development process, the time it takes to bring a project to conclusion, and the general market conditions presently facing the Province, requiring such an onerous target may lead to the cancellation of existing or planned projects, or developers seeking other opportunities for development outside of the City.

We question whether there is to be any consideration given to phasing or transitioning towards this, or any other, affordable housing target that may be established.

While attempting to increase the rate at which affordable housing is created, the realities of construction must be considered – specifically that the cost to build an affordable unit is no different than the cost to build a market unit, however these units may need to be sold at a

loss to meet the definition of 'affordable' for a specific area. Consideration should be given on providing incentives to offset the costs of these units, such as the reduction/elimination of planning and permit application fees, development charges, parkland contributions, or community benefits. The measures suggested in **Policy 4.1.1.2** do not address the inherent difficulties in creating a business case for affordable units absent significant assistance from all levels of Government.

We are also concerned that there is a lack of recognition for 'intrinsically affordable' or 'attainable' units. It is the Owner's position that increasing the diversity and supply of a variety of housing options through the provision of apartment, townhouse, stacked townhouse, and other innovative design options are crucial in creating not only a complete and diverse community, but would also contribute to the inherent affordability across the City by providing options for all income levels. Alternative forms of housing can be considered affordable when compared to the relatively limited supply of traditional forms of ground-related housing, although may not meet the strict definition of 'affordable'.

We continue to suggest that the VOP must include a wide variety of options for meeting the stated affordable unit targets, including through 'intrinsically affordable' and attainable units, and through an increased supply.

Lastly, transition protocols should be well defined for any active development proposals which are currently under review.

These comments apply also to the Inclusionary Zoning policies contained in **Policies 5.1.3.4** and **5.1.3.5**.

Section 4.3.1: The Public Realm

We would like to comment on the following policy with respect to the public realm:

Policy 4.3.1.2(n): *That the Public Realm contributes to a distinct sense of place and the health and wellbeing of residents by being physically and visually accessible, inclusive, diverse and environmentally sustainable. The investment and design of the Public Realm, includes but not limited to, the following:... incorporate, where possible, Green Infrastructure, including Low Impact Development;...*

In our opinion, this Policy, as well as those within **Policy 4.3.1.3**, fails to fully consider the opportunities inherent in the design of the Public Realm to incorporate stormwater management facilities, particularly infiltration facilities, within public boulevards. We suggest these areas present an opportunity to aid in mitigation stormwater flows from streets and private lands into municipal infrastructure through innovative design, and request that greater emphasis on such design interventions be included in the VOP. Such treatment could also serve to address issues related to climate change and biodiversity.

This comment applies also to the provisions of **Section 4.6.1** (Sustainable Growth) and **4.7.3** (Stormwater Management).

Additionally, we suggest the consideration for on-street parking should be considered within **Policy 4.3.1.3** in order to support the vitality of at grade non-residential uses, and to serve as a traffic calming measure along arterial streets.

Section 4.3.2: Built Form and Development Policies

We would like to comment on the following built form policies:

Policy 4.3.2.1(a) states *“That all new or redeveloped buildings in the City shall support the following design principles: heights, massing, scale, setbacks, building articulation and separation distances shall ensure privacy, sunlight, and sky views and limit shadow and/or wind impacts for nearby buildings, parks, open spaces and private amenity spaces;...”*

As previously outlined, the need for existing context to evolve along the Yonge Street Corridor is paramount in achieving the required densities to support the Primary Corridor and Royal Orchard PMTSA. In this regard, we suggest that the text of this policy should be revised to remove the word ‘ensure’ and replace it with ‘have regard for’, such that it reads

*“That all new or redeveloped buildings in the City shall support the following design principles: heights, massing, scale, setbacks, building articulation and separation distances shall **have regard for** privacy, sunlight, and sky views and limit shadow and/or wind impacts for nearby buildings, parks, open spaces and private amenity spaces;...”*

Additionally, we suggest that a similar revision is required for **Policy 4.3.2.1(d)**. It should be explicitly stated that the built form aspects of a proposal necessary to support transit may naturally result in a change and evolution of the existing context. Additionally, it should be recognized that ‘transition’ does not inherently mean a reduction in height or density.

Further, we suggest that this Policy must be reviewed for consistency with the recently released Bill 17: the *Protect Ontario by Building Faster and Smarter Act, 2025*, which would potentially restrict the studies and considerations of development which may be required or assessed by the City.

Section 4.3.3: Site Design and Building Types

We wish to provide the following comments with respect to the policies of this Section:

Policy 4.3.3.9: *That 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 or Townhouse:*

- a. *High-Rise Building podiums shall be setback a minimum of 7.5 metres from the property line if they have habitable windows facing the property line;*
- b. *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; and*
- c. *the first twelve Storeys of a High-Rise Building shall be contained within a 45-degree angular plane measured from the property line abutting those house form buildings.*

With respect to **subsection (a)**, we continue to suggest that providing a specific setback within the VOP is overly prescriptive, and is best left for a Zoning By-law. With respect to **subsection (c)**, refer to our prior comments with respect to the implementation of 'transition zones'.

We would like to comment on the following policy:

Policy 4.3.3.10(a): *That Mid-Rise Buildings over six Storeys in height and all High-Rise Buildings shall be designed with a pedestrian-scaled podium or other appropriate architectural articulation to enhance the building design and provide an active pedestrian streetscape, which is: two to six Storeys in height...*

We continue to suggest that the height of a podium/base building should be based on context, and particularly the planned context, and not governed by a fixed height within the VOP.

We would like to comment on the following policy with respect to setbacks above the podium:

Policy 4.3.3.11: *That taller building elements above the podium of a Mid-Rise or High-Rise Buildings will be setback three metres along all public street frontages in order to provide an appropriate pedestrian environment and mitigate wind impacts at the street level.*

We continue to suggest that there are alternative means of achieving an appropriate pedestrian environment while mitigating wind impacts beyond a 3-metre stepback from the podium/base building. This policy should be revised to ensure flexibility for future design options and avoid potentially repetitive/generic designs that could detract from the unique characteristics and sense of place of specific communities if applied uniformly across the City. Given the desire for architectural interest outlined in **Policy 4.3.3.13**, we respectfully request that this policy be reconsidered.

It must also be noted that building step-backs introduce significant design and structural impacts, which may result in deeper units within the podium that do not receive adequate natural light, compromising the quality of the interior environment. Furthermore, step-backs often require the transfer of plumbing, HVAC, and structural elements across different levels, which not only adds to construction complexity and cost, but also increases the carbon

footprint. This can result in the need for additional materials and labor, further compounding costs, and negatively affecting the construction schedule and overall project affordability.

Additionally, building step-backs contribute to increased surface area exposure, which reduces the thermal efficiency of the building. Unlike the simple, compact form of a cube, which is inherently more energy-efficient, step-backs demand additional insulation measures and energy-intensive detailing to maintain performance. These further impacts construction costs, affordability, and the environmental sustainability of the project.

We encourage exploring alternative design solutions that can create engaging, pedestrian-friendly streetscapes while minimizing negative cost and sustainability implications, and fostering architectural creativity.

Policy 4.3.3.12: *That a separation distance of 15 metres will be established between habitable space windows of any two or more podiums. The separation distance between the tower portion of High-Rise Buildings will be a minimum of 25 metres.*

We continue to suggest that providing a specific setback within the VOP is overly prescriptive, and is best left for a Zoning By-law. Further, this policy should provide greater flexibility with respect to the minimum separation distance in recognition that there may be situations where a separation of less than 25 metres is appropriate. Similarly, we suggest that a reduced facing distance may be appropriate between windows within a podium/base building depending on context.

Policy 4.3.3.13(f): *That the design of High-Rise Buildings should:... include podiums that, where possible, in mixed-use areas, allow for non-residential uses that serve the daily needs of residents;...*

We again suggest that there may be situations where a podium form is not required or appropriate. We request that the language of this policy be revised to 'encourage' the measures outlined in the subsections, rather than the term 'should', which is still prescriptive. This will allow for flexibility in design without potentially requiring an Amendment to the VOP.

Policy 4.3.3.13(h): *That the design of High-Rise Buildings should:... provide unimpeded access to publicly accessible private amenities such as courtyards, rooftop terraces and/or facilities (e.g., access to skyways to allow for climate-controlled pedestrian circulation between buildings);...*

While we appreciate the desire to explore more urban and innovative forms of public open space, we suggest that there are technical, safety, and security considerations that may complicate the implementation of this Policy. For example:

- From a built form perspective, creating a public access route to a rooftop space which precludes access to the rest of a private building may result in an inefficient built form,

with redundant elevators or stairways. This would potentially impact the gross floor area and density of a development if such area is included in the calculation of same.

- Providing public access to rooftop amenity areas may result in significant safety and liability concerns for a potential condominium corporation. If this framework is to be established, we suggest that the City should be responsible for indemnifying a private landowner for any injuries that may accidentally occur, similar to within a public park.
- Maintenance obligations may entail additional cost which is inequitable to assume a condominium corporation should bear.
- From a Zoning perspective, it is unclear whether publicly accessible areas would be considered part of the required outdoor amenity space for a building, or if it is expected that these areas be in addition to the outdoor amenity for residents.

Finally, we suggest that should any form of publicly accessible amenity space be provided within a development should be given credit for any Parkland Dedication requirements under the *Planning Act*.

Policy 4.3.3.14: *That High-Rise Buildings should be designed as slender towers and spaced appropriately in order to provide appropriate privacy and daylight conditions for people living and working within them, to minimize shadows created by such buildings and to contribute to overall excellence in the Vaughan's urban design, through the following criteria:*

- a. the base and/or podium of the building should be no longer than 80 metres in length;*
- b. the floorplate of the building, measured as the total area contained within the exterior face of a building, excluding balconies, for Storeys above the podium generally shall be no greater than 750 square metres, except for High-Rise Buildings containing office uses above the twelfth Storey;*
- c. the portions of High-Rise Buildings above twelve Storeys shall be setback a minimum of 12.5 metres from any side or rear property line; and*
- d. where more than one High-Rise Building is located on the same lot, the distance between any portions of the High-Rise Buildings above twelve Storeys shall generally be at least 25 metres.*

We continue to suggest that the language of this policy is overly prescriptive, and does not provide sufficient flexibility to accommodate situations where context may require longer podiums, larger tower floor plates, or lesser tower setbacks. Additionally, we suggest that **subsection (b)** should be revised to allow greater floorplates for all high-rise buildings considering that larger building cores and enhanced structural requirements may be necessary within increased height. We suggest that rather than providing a specific value, the size of a floorplate should be determined based on achieving desirable outcomes, such as appropriately mitigating shadow and wind impacts.

Policy 4.3.3.17 (b): *That for Mid-Rise Buildings or High-Rise Buildings:... surface parking elsewhere on the lot will be setback from any property line by a minimum of 3 metres and shall be appropriately screened through landscaping;...*

We continue to suggest that the inclusion of a specific setback is overly prescriptive within the VOP, and is best incorporated within the Zoning By-law. In this regard, the requirement for appropriate screening through landscaping is sufficient to demonstrate the intent of this Policy, without the need for a numeric value.

Policy 4.3.3.18(b): *That for Mid-Rise Buildings and High-Rise Buildings in Strategic Growth Areas: ...surface parking areas are not permitted, except:*

- i. to provide minimal pick-up/drop-off and/or loading parking spaces intended for short-term use;*
- ii. to provide sufficient resident or visitor parking spaces on an interim basis as part of a phased Development; ...*

Please clarify if this Policy will be revised to reflect recent changes to the *Planning Act* which provide that parking cannot be required within a PMTSA.

Additionally, we suggest that the City should consider means to implement on-street layby parking within Strategic Growth Areas as a means to both support the desired non-residential floor area at grade, and also serve as a traffic calming measure. It has been our experience that patrons are unlikely to enter an underground parking area for short visits to storefronts such as a coffee shop, convenience store, or dry cleaning, thus resulting in reduced activity. The provision of on-street parking would also allow a parking supply within a building to be dedicated solely to residents and their visitors, thus potentially increasing the overall supply across a community.

This comment would also apply to the Public Realm Policies of **Section 4.3.1**, and the Transportation and Mobility Policies of **Section 2.14**, particularly with respect to the policies pertaining to Road Safety.

Section 4.4.1: Parks and Open Space Network

In light of **Policy 4.4.1.1**, which states “*That where there is a conflict between the policies in section 4.4.1, the policies pertaining to the underlying land use designation in this Plan, or the relevant Secondary Plan, the more restrictive policies shall apply.*” we continue to suggest that there is a need for a comprehensive review of all Secondary Plans to ensure consistency with the VOP and PPS (2024).

Section 4.4.2: Parkland System

We support the provision of Strata Parks within the overall City Parks hierarchy as outlined in **Policy 4.4.2.3**, however continue to be concerned with the criteria of **Policy 4.4.2.4**. As

previously provided in our February letter, this Policy is overly prescriptive, and does not appear to recognize the realities of how and where Strata Parks would reasonably be desired or provided.

As a result, we feel the ability of the City to achieve the intended delivery of innovative park or open spaces within SGAs may be limited. Given the restrictions of Policy 4.4.2.4 we feel there is no practical situation wherein a Strata Park could feasibly be provided.

Section 4.4.3: Open Space Typologies

We continue to request clarification as to what responsibilities, if any, the City would bear within the referenced Agreement in **Policy 4.4.3.2**. There are legal and operational concerns with respect to the provision of publicly accessible, but privately owned spaces (such as liability) which should be clearly stated to ensure full transparency between the City and a proponent.

Section 4.4.4: Open Space Design

While we support increasing the variety of park and open space designs across the City, we feel that the locational and size criteria outlined in **Policies 4.4.4.3, 4.4.4.5, and 4.4.4.8** may limit the ability to realize innovative and unique open spaces and POPS in the context of an increasingly urbanized and dense City Structure. We suggest that greater flexibility be included in the VOP to allow departures from the general standards to recognize unique opportunities as they arise.

Further, we suggest that consideration should be included to address the notion that where a park is co-located with a School, there are inherent efficiencies that can be gained with respect to programming that could enable a park area to be reduced.

Section 4.4.5: Parkland Dedication

With respect to the Parkland Dedication rates in **Policy 4.4.5.2** and **Policy 4.4.5.4**, we suggest that any parkland calculations should be net of any conveyances to the municipality for road purposes.

Additionally, **Policy 4.5.5.8** continues to provide: *That Privately Owned Public Spaces may be eligible for parkland dedication credit toward satisfying the parkland dedication requirements for a Development or Redevelopment, subject to meeting all requirements established in Sections 4.4.3.2 and 4.4.4.8 of this Plan.*

We support the potential to provide Parkland Dedication credit for the provision of POPS, but request confirmation of the following matters:

- We request clarity as to whether this policy applies to *Strata Parks* given this form is distinct from POPS based on the definitions of the VOP.

- We note that both Section 51.1 and 42 of the *Planning Act* do not solely refer to 'Parks', but to "...park or other public recreational purposes...". On this basis, we feel that the VOP should ensure greater flexibility in terms of what is considered for Parkland Dedication credit, and suggest that the policy be revised to state that POPS and Strata Parks '**shall**' be eligible for Parkland Dedication credit.
- We request clarity as to how credit applied under this Policy will be determined.

Section 5.1.1: Secondary Plans

As previously noted in this Letter, we suggest there is a need to review all existing Secondary Plans for consistency with the VOP and PPS (2024) to ensure that the vision of the City can be realized, and to avoid the potential need for unnecessary Planning Act applications.

Section 5.1.3: Site and Area Specific Policies

We support the provisions of **Policy 5.1.3.2**, but suggest additional clarity would be beneficial to confirm that a site and area specific policy supersedes any conflicting policies of the VOP.

Section 5.2: Engagement and Consultation

We question the need for **Policy 5.2.1.7(a)**: "*A new public meeting for a planning application(s) shall automatically be required when any of the following circumstances occur: any application(s) that has not been considered by Council within two years after the date it was considered at a previous statutory public meeting;...*"

We suggest that absent a significant change in City or Provincial Policy, this would simply further prolong a development process. Further, it is not required by the Planning Act.

Additionally **subsection (b)** states that: *an application(s) has been deemed by the City to be significantly amended, such as an increase to the proposed density and/or building height beyond what was proposed and considered by Council at a previous public meeting.*

We believe this is overly broad, and ignores the realities of a development process which can often naturally result in changes to built form through the course of addressing technical comments.

Section 5.3: Implementation Tools

We would like to comment on the following policy with respect to the use of Holding symbols:

Policy 5.3.1.14: *That the Holding Symbol (H) may be applied where Council has determined the specific land use for an area or a parcel of land is premature until one or more of the following have been addressed:...*

We continue to suggest that many of the matters identified in the subsections for this Policy are redundant given the requirements of the *Planning Act* and *Building Code Act*. On this basis, the use of Hold provisions should be reviewed to ensure that they are only enacted as needed and do not require an Owner or Proponent to potentially delay approval/construction to remove a Hold symbol.

In particular, **subsection (o)** outlines that a Hold provision may be enacted with respect to “*any required conveyance of parkland, finalization of park spaces and/or Privately Owned Public Spaces, and entering into the necessary agreements with respect to these park facilities and/or payment of cash-in-lieu.*”

This requirement is particularly redundant given that the Financial and Land Dedication Tools of the VOP are outlined in **Policies 5.3.1.16** through **5.3.1.21**, with **5.3.1.18(a)** specifically stating “*That Development approvals shall implement the required equitable contributions of funds, land dedications and commitments for services that will be in place and operative prior to, or coincident with occupancy and use of the land. Items which may be addressed in Development agreements or other forms of agreements include but are not limited to: parks, park facilities, recreational trails, open space and Natural Heritage Network features, including the protection, ownership and management of Table Land Woodlands;...*” **[emphasis added]**.

Additionally, where Hold provisions are enacted, we suggest that ability to remove the symbol be delegated to Staff to avoid potential delays due to Council schedules/recesses. We note that this has been undertaken in several other municipalities across the Greater Toronto Area.

Section 5.4.2: Complete Application Submission Requirements

We suggest that the requirements of **Policy 5.4.2.2** and **Table 5.1** must be reviewed for consistency with Bill 17: the *Protect Ontario by Building Faster and Smarter Act, 2025*, which proposes refinements to the requirements that constitute a ‘complete application’.

Additionally, we suggest that the provisions of **5.4.2.3(e)** should be reconsidered. As written, the policy makes no allowance for professional judgement or experience, deferring solely to the City’s Terms of Reference (TOR) to determine if a technical report is acceptable for the purposes of deeming an application ‘complete’. Noting that Bill 17 also contemplates changes to the *Planning Act* with respect to this matter, we suggest that technical matters related to a report or plan, including with respect to the City’s TOR, are best dealt with through the formal review process to avoid delays to the consideration of a development proposal.

Policy 5.4.2.4 makes reference to “*...the requirements of 5.4.1.6...*”, however no such policy exists.

We suggest that **Policy 5.4.2.5** should clarify that the date of deeming an application is complete is retroactive to the date of submission, in accordance with established case law.

Conclusion

We welcome the opportunity to meet with City Staff to discuss the above comments and concerns, and request to be notified of any further activity or reporting on this matter.

If you have any questions or require additional information, please do not hesitate to contact Valentina Chu at (416) 322-6364 ext. 2105 or the undersigned at ext. 2101.

Yours truly,

GOLDBERG GROUP



Adam Layton, MCIP, RPP

cc. Dorian Place Limited Partnership
Jason Park, KSLLP

Appendix '1'
Property Owners

Municipal Address	Registered Owner
5 Dorian Place/ 8260 Yonge Street	Caspian Urban Developments Inc.
9 Dorian Place	Seyed Bahaeddin Alaei Fard; Somayeh Falah Zavaraki
15 Dorian Place	Mahmoud Jalalpour
19 Dorian Place	Mohammadreza Jalalpour
23 Dorian Place	Farnaz Asadi-Nik
27 Dorian Place	Seyed Mahyar Ghoreshi
31 Dorian Place	Mohsen Jalalpour