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Communication

Council – June 24, 2025

CW(PM) – Report No. 24 Item No. 10

June 4, 2025

VIA E-MAIL ONLY

Mayor and Members of City Council
City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario L6A 1T1

Dear Members of City Council:

RE: “DRAFT” City of Vaughan- Official Plan 2025,

and

**“DRAFT” The VMC Plan- Secondary Plan for the Vaughan Metropolitan Centre
2025**

Background

Liberty Development Corporation is the development manager for a number of registered landowners in the City of Vaughan. We continue to monitor the various studies and initiatives the City undertakes when it comes to facilitating continued improvements within the municipality. Please accept this letter as our response to the “DRAFT” City of Vaughan- Official Plan 2025, May 2025, and “DRAFT” The VMC Plan- Secondary Plan for the Vaughan Metropolitan Centre, April 2025.

General Comment (“DRAFT” City of Vaughan- Official Plan 2025)

As an overarching comment we believe the DRAFT City of Vaughan- Official Plan 2025, May 2025 (“VOP2025”) is a long and cumbersome document to read. We recognize it has been reduced in size since the first draft was issued in January 2025. It should be shortened further and simplified in light of the multiple provincial objectives that have been introduced over the last few years.

An Official Plan is intended to be a visionary document with high level policies providing guidance as Councils blueprint for developing the City over the next 25-year horizon and it should not act as a prescriptive document that limits flexibility in recognition of a changing marketplace.

With respect to the Transition policies, they are not very clear. The current Official Plan is over 15 years old and there has been significant change in Provincial policy to address much

needed housing. As such, we are wondering why the City would not go a step further and repeal VOP 2010 in its entirety?

Section 4.3- Urban Design and the Elements of a Great City

The Urban Design component should be scoped/reduced in content in light of Bill 23 changes affecting design review. Commensurate with this, the City should either eliminate or reduce the scope of the Urban Design Review Panel ("Panel"). The process of undergoing 2 Panel meetings as part of an Official Plan Amendment ("OPA") and/or Zoning By-law Amendment ("ZBA") application adds another layer of review creating added delay in obtaining approvals and ultimately building much needed housing. If the Panel is to be used efficiently, it should be done at the Site Plan approval stage, where the ultimate design of the development is finalized.

Section 5.4.1- Pre-Application Consultation

VOP2025 identifies pre-application consultation ("PAC") as the first step in the development review process to ensure development applications are complete and supported by submissions that fulfill the review requirements of the City and other pertinent review agencies. It further notes it is the policy of Council that a pre-application consultation meeting with the City may be requested by an applicant and be held prior to the submission of development applications. As part of the complete application submission requirements an Executed and Valid PAC understanding has been identified as being required. If this process is intended to be voluntary, why is there a need to require the industry to submit this specific document?

Section 5.4.2- Complete Application Submission Requirements

There are a significant number of studies and reports identified that are required to be submitted as part of the various planning approval applications. In reviewing Table 5.1- Required Information, Reports, Studies and Materials, it identifies Architectural Material and an Urban Design based brief to name a couple. As noted earlier in our letter, these matters were removed from the purview of the City by Bill 23. We recommend staff review this table and scope the requirements accordingly.

With respect to the matter of Wind Studies, being required at the OPA and/or ZBA stage, we recommend this type of study is more appropriately dealt with at the Site Plan approval stage where the detailed design of a building is crystallized.

Regarding larger studies/reports such as Transportation or Storm Water Management, which take considerable time and expense to undertake, we are recommending staff scope these type of studies/reports, especially within the Vaughan Metropolitan Centre ("VMC"). By scoping we mean reducing the extent of the work and content required by the City from the various Consultants that produce these reports. There is a significant database that has been collected over the years by the City through the numerous amount of development applications that have been approved or are being reviewed within the VMC. Accordingly, we recommend the City utilize 'addendum reports' that build on the existing database. This would result in greater review efficiency and assist in expediting the City's review process.

General Comment ("DRAFT" The VMC Plan- Secondary Plan for the Vaughan Metropolitan Centre 2025)

As an overarching comment we believe the VMC SecPlan 2025 is too prescriptive in certain areas. Similar to an Official Plan, Secondary Plans should be more visionary with high level policies and providing certain requirements as guidance rather than being prescriptive like a Zoning By-law.

Section 4- Growth Management

General Policy 4.1.2

This policy dictates due to the ability of the City and the Region to provide for the required services and infrastructure, the rate of growth within the VMC will be identified. This infers there is no capacity to approve any development applications at this time, thereby resulting in the potential to delay development approvals. Given the established need to provide housing the City should be ensuring significant infrastructure projects within the VMC should receive priority.

General Policy 4.2.3

This policy identifies development in the VMC shall only be permitted if it can be demonstrated to the satisfaction of the City that sufficient parkland will be provided within the VMC Secondary Plan Area to provide for a minimum of 0.3 ha of parkland per 1,000 residents. How was this number derived and more importantly how does this relate to the caps established by the *Planning Act* wherein there is maximum amount of 10% or 15%?

The obligation of the developer is to meet the requirements of the *Planning Act*, it is the responsibility of the City to ensure they have and will provide the required parkland. We have on previous occasions identified the City should be acquiring parkland in advance of development in the City's downtown.

Section 5- Streets and Transportation

General Policy 5.3.4

This policy identifies the hierarchy of streets and more specifically the right-of-way ("ROW") widths. While remaining generally the same as the previous version of the VMC SecPlan 2010, there are a couple of streets identified for modified ROW widths.

The current ROW widths under the VMC SecPlan 2010 for Highway 7 are 45 metres east of Jane Street and 60 metres west of Jane Street, whereas now the VMC SecPlan 2025 identifies a ROW width of 68.2 metres. How does this wider ROW requirement impact existing development approvals? Will further lands be required by the City to accommodate the ROW, thereby resulting in a reduced lot size?

Given the quest to build complete communities which are safe and attractive, widening Highway 7 by an additional 8.2 metres seems contrary to this goal. Traversing Highway 7 will become even more problematic especially for seniors and people with disabilities. In addition, most people perceive that wider roads typically result in increased speeds, thereby making this requirement at odds with the intent of creating a safer community.

Section 6- Energy, Water and the Natural Environment

General Policy 6.5.3

This policy aims to reduce heat island effect, and in line with the City's Sustainability Metrics Program, recommends certain buildings (such as mixed-use) shall be encouraged to install a

green roof covering 75% or more of the available roof space and/or using a combination of other techniques to meet a minimum of 75% of the roof to be used for reducing heat island effect. Previously the VMC SecPlan (2010) had values of 50% green roof and a combination having 70%. How was this new value determined?

Section 7- Parks and Open Spaces

General Policy 7.1.9

This policy allows the City to establish alternative parkland dedication requirements for the VMC without amendment to the Secondary Plan. As a minimum, wording is required to clarify that if the City does so, the City shall do so in accordance with the maximum requirement(s) permitted under the *Planning Act*.

General Policies 7.2.2 and 7.2.3

These policies establish criteria on what constitutes an Urban Park and Public Square, whereas VMC SecPlan 2010 did not identify criteria for Urban Parks, and only had a minimum size of 0.2 hectares for a Public Square. The VMC SecPlan 2025 now identifies that Urban Parks are to provide a minimum contiguous area of 0.75 hectares and Public Squares are to provide a contiguous area between 0.2 and 0.75 hectares. We would like to know how the City determined these areas.

General Policies 7.4.1

The encumbrance of parkland policy seeks to ensure all parkland to be free of all surface and below-grade encumbrances, including parking, utilities, structures, easements, and systems. It goes on to allow encumbered parkland subject to extenuating circumstances, wherein the applicant must demonstrate such hardship through a justification report. As written, it appears this policy is discouraging the use of stratified parkland. Rather it should be written to embrace these type of parks to allow even more parkland for residents immediately within the development and surrounding community.

Section 9- Land Use, Density and Built Form

General Policy 9.1.5

This states development in the VMC shall demonstrate to the satisfaction of the City that sufficient retail and service uses are present to support the anticipated needs of the local population for daily necessities, as per the intent of this Plan. How does the City intend to address this- are you seeking to introduce the need for additional studies? Adding more requirements to be fulfilled by the development industry would only prolong the approval process.

General Policy 9.1.21

This policy prescribes building heights and densities are encouraged to decrease within the Mixed-Use designation as the distance from the central point (Subway station area) increases. Given you are not capping maximum building heights and densities in the VMC SecPlan 2025, why is this policy being introduced? Based on all of the development to date within the VMC, you have multiple examples of varying heights- there is no need to have this policy.

General Policy 9.2.2

Under this policy, the VMC SecPlan 2025 identifies a list of permitted uses. Using restrictive language to only permit these uses does not afford flexibility in light of the goal of achieving a more vibrant mixed-use community. We recommend the use of language such as "including

but not limited to”, which is more appropriate to avoid future amendments to the VMC SecPlan 2025 for something as simple as a use permission.

General Policy 9.7.5

Developments with a residential component within the Neighbourhood designation, as delineated on Schedule G, shall include a minimum of 15% of units with three bedrooms, is a new policy that has been introduced into the VMC SecPlan 2025. How was this percentage derived? We wish to note the market ultimately determines what would be built within a development project as it relates to the extent of the unit types.

Sub-Section 9.9- Built Form

As an overarching comment references to the Urban Design component should be scoped/reduced in content in light of Bill 23 changes affecting design review. Accordingly, further refinement of the Built Form policies is required.

General Policy 9.9.6

This policy provides a very technical requirement for build-to lines and setbacks, which is more conducive for a Zoning By-law. Softer language such as “generally” should be used rather than being overly prescriptive.

General Policy 9.9.25

This policy sets out the floorplate sizes for towers and identifies floorplates shall have average sizes no greater than 800 square meters. Over the course of the development of the VMC, many development approvals have exceeded this floorplate size. This policy should provide floorplate sizes that are more akin to the existing context. Accordingly, flexibility to allow for larger floorplate sizes is encouraged.

General Policy 9.9.26 b and d.

This policy sets the distance between the facing walls (“separation distance”) of two towers at 35 metres within the Neighbourhood designation, where previously a tower separation distance of 25 metres was prescribed. How was the new separation distance derived?

This policy also proposes the tower portion of high-rise buildings shall be setback a minimum of 50% of the tower separation distance established in this policy from any side or rear property line to provide for tall buildings on adjacent properties, where permitted. In its simplest form this represents a setback of 17.5 metres. Again, we seek an answer on how this was derived?

Section 10- Administration and Interpretation

Policy 10..1.1 states the policies of this Plan shall supersede the policies of any other area or site-specific Official Plan Amendment which is in force in the City on the date of the approval of this Plan. In light of the removal of height and density maximums and the introduction of more prescriptive requirements to name a few examples, how are existing site-specific approvals transitioned? Will permissions be removed and more stringent requirements be imposed? The transition policies referred to and contained in the parent Vaughan Official Plan 2025 are somewhat confusing. Further clarity is required.

Conclusion

We believe there is still more work to be done on both the Vaughan Official Plan 2025 and the VMC Secondary Plan 2025. We would be pleased to meet with staff to discuss these matters further. Please include us in any notices and meetings with respect to this matter. Should you require further information please feel free to contact me directly at (905) 910-0124.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "W. Kiru", is written over the typed name.

Bill Kiru, Director of Planning
Liberty Development

cc. Marco Filice
Senior Vice President, Liberty Development

Ms. Christina Bruce
Director, Policy Planning and Special Programs

Mr. Fausto Filipetto
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