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October 28, 2020

Brandon Correia – Manager, Special Projects  
City of Vaughan  
Office of the Deputy City Manager, Planning and Growth Management Portfolio  
2141 Major Mackenzie Dr.  
Vaughan, ON  
L6A 1T1

Dear Mr. Correia:

**RE: CITY OF VAUGHAN – COMPREHENSIVE ZONING BY-LAW REVIEW 3<sup>rd</sup> DRAFT COMMENT LETTER**

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**SmartCentres** (through our various ownership corporations) is pleased to provide this letter regarding the third draft of the Comprehensive Zoning By-law (hereinafter the “draft Zoning By-law”) being considered for approval by Council. We had provided comments to the City on the first draft of the Comprehensive Zoning By-law on August 14<sup>th</sup>, 2019 (see attached letter) and second draft of the Comprehensive Zoning By-law on March 10<sup>th</sup>, 2020, April 23<sup>rd</sup>, 2020, and May 20<sup>th</sup>, 2020 (see attached letters).

## **GENERAL COMMENTS**

Please note that our comments are by no means exhaustive, and we would like to meet with staff to discuss all aspects of the third draft. We feel that more discussions need to occur prior to the by-law being brought before council. Also, it would be appreciated if a track changed version of the draft by-law noting changes between the first draft, the second draft and the third draft and in the future subsequent versions be provided.

## **VAUGHAN METROPOLITAN CENTRE LANDS**

SmartCentres owns 100 acres of land within the Vaughan Metropolitan Centre (“VMC”) and has worked very closely with City Staff for many years on various planning policies and significant development proposals. Specifically, a mediation process which took several years between the City and stakeholders during the implementation of the Vaughan Metropolitan Secondary Plan (“VMC Secondary Plan”). The proposed zoning provisions in the VMC are significantly more stringent and restrictive than the intentions of the VMC Secondary Plan and will stifle creativity throughout the design process.

It is our understanding the intent of the draft by-law is to implement the City of Vaughan Official Plan and VMC Secondary Plan. Given an update to the VMC Secondary Plan is to occur shortly, which will likely include numerous changes to the policies affecting development in the VMC, the City should delay implementation of the VMC Zones until the Secondary Plan update occurs. If

not, what is the City's plan for further updating the Comprehensive Zoning By-law once the VMC Secondary Plan review is completed?

It appears that SmartCentres comments regarding a number of inconsistencies with the Phase 2B second draft have not been reflected in the Phase 2C third draft. These include:

#### 1. VMC Zone Land Uses

It appears that SmartCentres comments regarding land uses in the VMC Zones (V1 to V4) have not been addressed. We reiterate that the VMC Secondary Plan provides for the broadest range of uses in the City and this should be incorporated into the VMC Zones accordingly to encourage a diverse, mixed use community that is adequately able to response to market conditions. For example:

- Multiple townhouse dwelling units are only permitted in the V3 Zone, the multiple townhouse dwelling units should be permitted within all VMC zones. Multiple townhouse dwelling units were recently approved for Transit City 1 and 2 within the VMC.
- Schools are not permitted within a V4 Zone, however the VMC Secondary Plan identifies lands which are proposed to be zoned V4 as potential school sites on Schedule E and Policy 3.4. Thus, Schools should be provided within all VMC zones.

Furthermore, there is concern with the additional requirements to Table 10-2. Item 4 notes *apartment dwellings shall not be permitted within the ground floor frontage, except that a maximum of 15% of the ground floor frontage may be used for lobby or other common areas associated with the apartment dwelling*. There has been approvals within the VMC which permit at-grade apartment dwellings (Transit City 3), it is our opinion that this additional requirement should be removed, as this built form currently exists within VMC.

Item 5 notes *this use shall only be permitted in the ground floor frontage and the total gross floor area shall not exceed 10% of the gross floor area of all uses on the lot*. We request this additional requirement be removed as it restrictive on the type of use that can be provided at grade. We have experienced in the past that some tenants required a specific gross floor area to operate their businesses, not having the flexibility limit potential tenants.

#### 2. Lot and Building Standards

It appears that SmartCentres comments on lot and building standards in the VMC Zones have not been addressed. We reiterate these comments and request further discussion on the issues raised previously. For example:

- The draft by-law seeks to implement a *minimum office tower separation of 20 m*. The VMC secondary plan policy 8.7.18 states *the distance between the facing walls of a residential tower and an office tower may be reduced to a minimum of 20 metres, subject to appropriate site and building design. Lesser separation distances between office towers may be permitted*. By applying a minimum 20 m separation distance the proposed provision contradicts the VMC secondary plan policies, as lesser separation distances may be permitted.
- The draft by-law seeks to implement a *maximum residential floor plate of 750 sq. m*. It is our opinion this provision will limit creativity and flexibility within future developments within VMC. Approvals have been granted for larger tower floor plate sizes within VMC, for example a maximum tower floor plate size of 820 sq. m. We understand the VMC secondary plan policy 8.7.10 states *the maximum size of a residential tower floor plate*



*shall be approximately 750 square metres.* However, this is an 'approximate' it is not a required maximum.

### 3. Landmark Locations

The Landmark Location provision from Schedule A2 of Zoning By-law 1-88 has not been carried forward into the draft by-law. The landmark provision permits unlimited height in key locations along Highway 7. The inclusion of Landmark Location provisions in By-law 1-88 should be brought forward into the draft By-law. We are not supportive of the exclusion of these provisions from the draft By-law, which if excluded, essentially downzones the Landmark Locations that is inconsistent with provincial policy related to urban growth centres and Major Transit Station Areas.

### 4. Active Frontages

It appears the Active Use Frontages are no longer defined in the third draft, rather added to section 2.3.2 and 4.2 of the by-law. It is our recommendation that these provisions be removed from the draft by-law as it is restrictive and implemented through the VMC Secondary Plan (policies 8.1.2 and 8.6). Furthermore, there are discrepancies within Schedule B-1 as it does not correctly reflect Schedule H of the VMC Secondary Plan. Specifically, Schedule B1 adds active use frontage (convertible) along portion of Buttermill Avenue which is not identified on Schedule H of the VMC Secondary Plan.

### 5. Parking Rates

The VMC is home to the new constructed York Region VIVA Bus Terminal and VMC TTC Subway Station. The investment in higher-order transit facilities within this area is a major driving force to create an enormous opportunity for an increase in development within this area.

To encourage the use of the transit investment within the VMC, lower parking rates should be required for this area. The draft by-law currently requires the following minimum parking rates:

- A minimum range of 1.0 to 0.6 parking spaces for residential uses;
- A minimum range of 0.25 to 2.0 parking spaces for commercial uses; and
- A minimum range of 0.25 to 3.0 parking spaces for community uses.

SmartCentres has received a number of approvals for reduced parking rates which include:

- Transit City 1 and Transit City 2, approved in 2017 with a minimum parking rate of:
  - 0.5 parking spaces per unit and commercial parking.
- Transit City 3, approved in 2018 with a minimum parking rate of:
  - 0.33 parking spaces per unit.
  - No parking shall be required for retail uses.
- East Block Phase 2, approved in 2019 with a minimum parking rate of:
  - 0.41 parking spaces per unit.
  - Visitor, commercial and commercial paid parking spaces permitted off site.

It is our recommendation that the minimum parking rates for residential uses be reduced for VMC zones. As shown through a number of recently approved applications within the VMC reduce rates are supported by the amount of transit infrastructure within VMC. It appears the proposed rates do not reflect the investment in higher-order transit, rather encourages the use of vehicles.

Further, we recommend for all other uses within the VMC zone that the minimum parking space requirements be removed. This is consistent with the first draft of the by-law which did not require minimum rates for non-residential uses.

We would be happy to have a meeting with staff to discuss the work that has been completed to support reduced parking rates within the VMC through the above noted applications.

## **WESTON / 7 SECONDARY PLAN AREA LANDS**

The SmartCentres lands within the Weston / 7 Secondary Plan Area are proposed to be zoned General Mixed Use (GMU) in the draft By-law. The GMU Zone does not reflect the current designations in VOP2010 nor the current applications (file no.'s OP.19.012 and Z.19.036) filed for the Highway 400 / 7 lands. Further the Weston / 7 Secondary Plan is still underway (with Phase 2 expected in 2021) and likely will provide additional details for height, density and permitted uses which the GMU Zone does not reflect.

We therefore request that the draft By-law exclude the Weston / 7 Secondary Plan Area lands until such time as the Secondary Plan is completed. Should the City not exclude these lands, we request that the draft By-law implement the VOP2010 designations for the Plaza del Sole lands (a MMU Zone would be appropriate). To zone the lands GMU Zone would not be consistent with VOP2010. We also recommend the list of existing uses be included as permitted uses subject to regulation 2.5.1.4 in the draft Zoning By-law.

## **9200 BATHURST STREET**

It appears the recommendations noted in our comment letter dated April 23, 2020, for 9200 Bathurst Street has not been addressed.

The subject lands are proposed to be zoned GMU which permits the majority of the existing permitted uses on the subject lands; however, the new draft Zoning By-law propose is to update the existing zoning to implement the Official Plan. The proposed GMU zone restricts the subject lands and is not consistent with the permitted land use designation for the subject lands as outlined in the Official Plan. As such, we recommend the subject lands be rezoned to permit residential uses, maximum density of 3.5 and maximum height of 12-storey subject to a holding provision which would require a Zoning By-law Amendment to permit additional uses, density and height on the subject lands.

In addition, we have not received a response to the list of items listed included within the chart of our attached letter for further clarification and confirmation of the interpretation of permitted uses. If there is any discrepancy in the existing uses and the proposed uses, we formally request that all existing uses be permitted within the GMU zone.

## **HWY 427/ HWY 7**

It appears the recommendations noted in our comment letter dated February 19, 2020, for Lands east and west of New Huntington Road, north of Highway 7 has not been addressed.

### **1. Permitted Uses**

The EMU zone provides a number of permitted uses, including Retail. However, the retail use is subject to the following condition on Table 8-2: *(2) this use shall only be permitted as part of a mixed-use development and the total amount of gross floor area of all uses subject to this portions shall be limited to a maximum of 30% of the gross floor area of all uses on the lot.*



As stated in the Official Plan (Policy 9.2.2.7.d), lands designated Employment Commercial Mixed-Use Areas located on Regional Intensification Corridors within Employment Areas are subject to a **minimum of 30% of the total gross floor area of all uses shall consist of uses other than retail uses**. Condition 2 above does not meet the intent of Policy 9.2.2.7.d) rather provides further restrictions for retail uses within lands designated Employment Commercial Mixed-Use Area. The Official Plan permits upwards of 70% of Gross Floor Area can be Retail on lands designated Employment Commercial Mixed-Use Areas, rather the draft Zoning is maximizing the permitted retail use at 30%.

Therefore, we recommend this condition be removed as the Official Plan will regulation the Gross Floor Area distribution for lands designated Employment Commercial Mixed-Use Areas.

## 2. Additional Uses

We recommend that “**Self-Storage Facility**” with the condition for mixed-use built form be considered as a permitted use within the By-law. The condition of the mixed-use built form would allow self-storage to be in combination of other commercial/retail uses on the Subject Lands. A self-storage facility in mixed use built-form provides the opportunity for a high-demand use for daily needs of residents and business within an urban setting be integrated in a built-form that is not land extensive, enhances the retail experience and pedestrian realm on the Subject Lands.

We recommend that both “**Warehousing and Distribution Facility**” and “**Manufacturing or Processing Facility**” be added as an additional use. The intent of the EMU zone is to provide for a wide range of employment and other uses and a limited amount of commercial uses. Therefore, permitting manufacturing or processing facility would permit more industrial uses like a distribution centre.

The subject lands are designated “Employment Area” and within a “Regional Intensification Corridor” which permits a range of industrial, manufacturing warehousing and where appropriate, office uses. The additional uses will assist with implementing the vision of the Official Plan policies for employment areas.

## SUMMARY

We believe that there are still a number of inconsistencies between the draft zoning by-law and the City Official Plan (including the VMC Secondary Plan). As the draft by-law stands today is restrictive and approval of this by-law will implement a by-law that is stifle the creativity of development within the City of Vaughan.

We request a meeting with staff to discuss our comment noted within this letter, and all previously letters submitted to City Staff.

We reserve the right to provide further comments on the draft By-law.

Thank you.



Yours truly,  
**Paula Bustard**

CC. *Matthew Kruger - SmartCentres*  
*David A. McKay, Celeste Salvagna - MHBC*



**SMARTCENTRES®**  
REAL ESTATE INVESTMENT TRUST

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**DELIVERED ELECTRONICALLY**

DATE May 20, 2020

TO: Mr. Brandon Correria  
Manager, Special Projects  
City of Vaughan  
2141 Major Mackenzie Drive  
Vaughan, ON L6A 1T1

**RE: City of Vaughan Comprehensive Zoning By-law, Phase 2 (B) Comments**

Dear Mr. Correria,

Further to our discussion on April 3<sup>rd</sup>, 2020, SmartCentres is pleased to provide the following comments on **Phase 2 (B) of the City of Vaughan Comprehensive Zoning By-Law**. We and our consultants have participated in the entirety of the public process to date and we look forward to working with staff to address our concerns prior to the finalization of this By-Law.

SmartCentres owns over 250 acres of land in the City of Vaughan, including 100 acres in the Vaughan Metropolitan Centre (VMC). We have worked closely with City staff for many years on the advancement of various planning policies and significant development proposals throughout the City of Vaughan. We have always strived to work collaboratively with the City of Vaughan including the significant developments we have advanced within the VMC.

Thank you.

Yours Truly,

**Matthew Kruger**  
Associate, Development  
SmartCentres REIT

CC: Paula Bustard, SmartCentres  
David McKay, MHBC

| COMMENTS   |   | PROPOSED BY-LAW 2020-____<br>SECOND DRAFT   | RECOMMENDATIONS   |
|--|---|---|---|
| <b>GENERAL COMMENTS– SECOND DRAFT ZONING BY-LAW</b>                                |   |   |   |
| 1  | It would be appreciated if a track changed version of the draft By-law was available.   | N/A   | The track changed version of the draft By-law noting changes between the first draft, the second draft and in the future subsequent versions be provided.   |
| 2  | We understand from discussions with City staff that existing site specific permissions will be incorporated over the coming months to reflect the permissions granted through site specific By-law amendments to By-law 1-88. | N/A   | We request being provided these exceptions as soon as they are ready for our review and comment.  |
| 3  | Active Use Frontage (required) Definition   | Section 3.0 Definitions<br><br>“Means the ground floor of a building or structure facing a street line that is permeable, transparent, and contains entrances for permitted retail uses in the subject zone. Emergency access doors, garage doors, service doors and loading doors are not permitted along the street line.”  | The definitions for Active Use Frontage (required) and Active Use Frontage (convertible) are unclear and do not provide the flexibility as outlined in the VMC Secondary Plan (Policies under Section 8.6).<br><br>We recommend the Proposed Schedule B-1 in the draft By-law be revised to reflect Schedule H in the VMC Secondary Plan. Further we recommend the definitions of Active Use Frontage be revised to include the legend notes noted on Schedule H in the VMC Secondary Plan.   |
| 4  | Active Use Frontage (convertible) Definition  | Section 3.0 Definitions<br><br>“Means the ground floor of a building or structure facing a street line that is designed for active use frontage, but where all uses in the subject zone are permitted.”   |   |
| 5  | Gross Floor Area Definition   | Section 3.0 Definitions<br><br>“In reference to a building or structure, means the aggregate of the floor areas of all storeys of a building measured from the outside of the exterior walls, but excluding any basement, attic, mechanical room, mechanical penthouse, elevator, elevator shaft, escalators, bicycle parking space, loading space, a dedicated waste storage area, or any portion of a garage or parking structure located above or below grade; or,<br><br>In reference to a secondary suite, the aggregate area of that portion of a dwelling devoted to and exclusively used as a secondary suite.” | We believe the following exclusions should be included into the definition of GFA: <ul style="list-style-type: none"><li>• Lockers;</li><li>• Mechanical/Electrical shafts;</li><li>• Garbage chute;</li><li>• Stair shafts;</li><li>• Washrooms; and</li><li>• Amenity Space required by the By-law</li></ul><br>The exclusions listed above are common elements that are not included in the calculation of GFA within other municipalities, such as the City of Toronto. It is our opinion the exclusions above be removed from the calculation of GFA as these are communal spaces for residents and visitors of a development. |
| 6  | Landmark Locations  | Schedule A2 By-law 1-88   | We recommend the inclusion of Landmark Location provisions in By-law 1-88 should be brought forward into the draft By-law.<br><br>SmartCentres is not supportive of the exclusion of these provisions from the draft By-law, which if excluded, essentially downzones the Landmark Locations that is inconsistent with provincial policy related to urban growth centres and Major Transit Station Areas.   |
| 7  | Proposed Schedule B-1 base mapping.   | Proposed Schedule B-1 draft By-law.   | We recommend Schedule B-1 base mapping in the VMC be updated as it is incorrect and should reflect existing and planned road networks. In particular, SmartCentres has built Applewood Crescent which is not properly shown.  |
| <b>SECTION 10.0 VAUGHAN METROPOLITAN CENTRE ZONES – SECOND DRAFT ZONING BY-LAW</b> |   |   |   |
| 8  | There is a significant variation and differences between the proposed uses within V 1 V2, V3 and V4.  | 10.2.1 Permitted Uses within V1 and V2  |   |

| COMMENTS |   | PROPOSED BY-LAW 2020-____<br>SECOND DRAFT  | RECOMMENDATIONS  |
|----------|---|--|--|
|          | These differences are inconsistent, lack rationale and do not permit a broad range of uses as contemplated in the VMC plan. | <ul style="list-style-type: none"><li>Existing Uses<ul style="list-style-type: none"><li>Existing uses buildings and structures that do not otherwise conform to the provisions of this By-law.</li></ul></li><li>Commercial Uses<ul style="list-style-type: none"><li>Art studio</li><li>Business services</li><li>Clinic</li><li>Commercial school</li><li>Financial intuition</li><li>Health and fitness centre</li><li>Hotel</li><li>Micro-manufacturing</li><li>Place of entertainment</li><li>Person service</li><li>Public hall</li><li>Restaurant</li><li>Retail</li><li>Retail, convenience</li><li>Retail, major</li><li>Theatre</li></ul></li><li>Employment Uses<ul style="list-style-type: none"><li>Office</li></ul></li><li>Residential Uses<ul style="list-style-type: none"><li>Apartment dwelling (condition 5)</li><li>Block townhouse dwelling</li><li>Live-work dwelling</li><li>Podium townhouse dwelling</li><li>Street townhouse dwelling</li></ul></li><li>Community Uses<ul style="list-style-type: none"><li>Community facility</li><li>Community Garden</li><li>Day care centre</li><li>Day care centre, adult</li><li>Emergency service</li><li>Long term care facility</li><li>Place of worship</li><li>Post-secondary school</li><li>Public parking</li><li>School</li><li>Urban square</li></ul></li><li>Specified Accessory Uses (all subject to condition 1)<ul style="list-style-type: none"><li>Home occupation</li><li>Outdoor display</li><li>Outdoor patio</li><li>Temporary sales office</li><li>Short-term rental</li></ul></li></ul> | We request that multiple-unit townhouse dwellings be permitted within the next draft. Residential dwelling is permitted within the VMC Secondary Plan. |
| 9        | There is a significant variation and differences between the proposed uses within V 1 V2, V3 and V4.                        | 10.2.1 Permitted Uses within V3  | Permitted uses in V3 are too restrictive. A broader spectrum of uses should be permitted within these lands. The VMC Secondary Plan (policy 8.4.1)     |



| COMMENTS |  | PROPOSED BY-LAW 2020-____<br>SECOND DRAFT  | RECOMMENDATIONS   |
|----------|--|--|---|
|          | These differences are inconsistent, lack rationale and do not permit a broad range of uses as contemplated in the VMC plan.  | <ul style="list-style-type: none"><li>Existing Uses<ul style="list-style-type: none"><li>Existing uses buildings and structures that do not otherwise conform to the provisions of this By-law.</li></ul></li><li>Commercial Uses<ul style="list-style-type: none"><li>Clinic</li><li>Financial intuition</li><li>Person service (condition 6)</li><li>Restaurant (condition 6)</li><li>Retail, convenience (condition 6)</li></ul></li><li>Employment Uses<ul style="list-style-type: none"><li>Office (condition 4)</li></ul></li><li>Residential Uses<ul style="list-style-type: none"><li>Apartment dwelling (condition 5)</li><li>Block townhouse dwelling</li><li>Live-work dwelling</li><li>Podium townhouse dwelling</li><li>Street townhouse dwelling</li></ul></li><li>Community Uses<ul style="list-style-type: none"><li>Community facility</li><li>Community Garden</li><li>Emergency service</li><li>Long term care facility</li><li>Place of worship</li><li>School</li><li>Urban square</li></ul></li><li>Specified Accessory Uses (all subject to condition 1)<ul style="list-style-type: none"><li>Home occupation</li><li>Outdoor patio</li><li>Temporary sales office</li><li>Short-term rental.</li></ul></li></ul> | <p>permits retail, service and commercial uses as complimentary/ancillary uses if it is deemed appropriate and conforms with VMC Secondary Plan policy 8.6 (retail requirements).</p> <p>Art studio, business service, commercial school, health and fitness centre, hotel, micro-manufacturing, place of entertainment, public hall, retail, retail (major) and theatre are not permitted. Why? We ask these uses be permitted within the next draft.</p> <p>We request that multiple-unit townhouse dwellings be permitted within the next draft.</p> <p>We request that day care centre, day care centre (adult) and post-secondary school be permitted within the next draft.</p> <p>We request that public parking be permitted within the next draft. Public parking is particularly important in residential zones (i.e. public parking / shared parking opportunities).</p> <p>We request that colleges and university be permitted within the next draft. This proposed change does not contemplate the emerging/ shifting trends in people’s personal behaviours and preferences. There is a growing need to provide public parking or shared parking opportunities.</p> <p>We request that outdoor display be permitted in the next draft.</p> |
| 10       | There is a significant variation and differences between the proposed uses within V 1 V2, V3 and V4. These differences are inconsistent, lack rationale and do not permit a broad range of uses as contemplated in the VMC plan. | <p>10.2.1 Permitted Uses within V4</p> <ul style="list-style-type: none"><li>Existing Uses<ul style="list-style-type: none"><li>Existing uses buildings and structures that do not otherwise conform to the provisions of this By-law.</li></ul></li><li>Commercial Uses<ul style="list-style-type: none"><li>Art studio</li><li>Business services</li><li>Clinic</li><li>Commercial school</li><li>Financial intuition</li><li>Hotel</li><li>Place of entertainment</li><li>Person service</li></ul></li></ul>  | <p>We request that art studio, business service, health and fitness centre, micro-manufacturing, retail (major) and theatre be permitted in the next draft.</p>   |

| COMMENTS               |                           | PROPOSED BY-LAW 2020-____<br>SECOND DRAFT   |      |      |  |  | RECOMMENDATIONS   |    |    |    |    |                        |      |      |      |      |  |  |
|------------------------|---------------------------|---|------|------|--|--|---|----|----|----|----|------------------------|------|------|------|------|--|--|
|                        |                           | <ul style="list-style-type: none"><li><ul style="list-style-type: none"><li>Public hall</li><li>Restaurant</li><li>Retail</li><li>Retail, convenience</li></ul></li><li>Employment Uses<ul style="list-style-type: none"><li>Office</li><li>Light manufacturing use</li><li>Research and development</li></ul></li><li>Community Uses<ul style="list-style-type: none"><li>Community Garden</li><li>Emergency service</li><li>Place of worship</li><li>Public parking</li><li>Urban square</li></ul></li><li>Specified Accessory Uses (all subject to condition 1)<ul style="list-style-type: none"><li>Home occupation</li><li>Outdoor display</li><li>Outdoor patio</li><li>Temporary sales office</li><li>Short-term rental.</li></ul></li></ul> |      |      |  |  | <p>We request that community facility, day care centre, day care centre (adult), long term care facility, post-secondary school and school be permitted in the next draft.</p> <p>We request that colleges and university be permitted within the next draft. These proposed changes do not contemplate the emerging/ shifting trends in people’s personal behaviours and preferences. There is a growing need to provide public parking or shared parking opportunities.</p> <p>We request that outdoor display area and short-term rental be permitted within the next draft.</p> |    |    |    |    |                        |      |      |      |      |  |  |
| 11                     | Condition Number 3        | Section 10.2.1<br><br>3. The use shall only be permitted in the ground floor frontage and the total gross floor area shall not exceed 10% of the gross floor area of all uses on the lot.   |      |      |  |  | We recommend condition 3 should be deleted from the draft By-law. We request that staff provide further rationale for permitting only ground floor commercial uses. Furthermore we would like to discuss the proposed 10% GFA restriction.  |    |    |    |    |                        |      |      |      |      |  |  |
| 12                     | Condition Number 4        | Section 10.2.1<br><br>4. Office uses shall only be permitted in the V3 Zone subject to the areas shown on Schedule B-1.   |      |      |  |  | We recommend condition 4 should be deleted. This policy/note in conjunction with Schedule B-1 of the draft By-law does not match the intent of the VMC Secondary Plan. Please see Schedule H of the VMC Secondary Plan which is not intended to be a prohibitive schedule. This policy is overly restrictive within lands designated as V3.   |    |    |    |    |                        |      |      |      |      |  |  |
| 13                     | Condition Number 5        | Section 10.2.1<br><br>5. Apartment dwellings shall not be permitted within the ground floor frontage.   |      |      |  |  | We request staff provide further rationale in regards to this condition. This condition exists and was approved by Council within the Transit City Condominiums (1 and 2) at 898 Portage Parkway and 5 Buttermill Avenue in VMC.  |    |    |    |    |                        |      |      |      |      |  |  |
| 14                     | Condition Number 6        | Section 10.2.1<br><br>6. This use shall only be permitted on a corner lot and within the first storey of the building.  |      |      |  |  | What is the rationale for limiting and prescribing specific uses on corner lots only? This is unclear and very restrictive.   |    |    |    |    |                        |      |      |      |      |  |  |
| 15                     | Condition Number 2        | Section 10.2.2<br><br>2. The minimum exterior side yard shall be 3.5 m where the exterior side yard abuts a walkway, greenway or Stormwater management facility.  |      |      |  |  | What is the rationale for the exact numerical measurement? This includes a higher setback than would typically be required.   |    |    |    |    |                        |      |      |      |      |  |  |
| 16                     | Podium Tower Requirements | Section 10.2.2 <table><tr><th>Requirement</th><th>V1</th><th>V2</th><th>V3</th><th>V4</th></tr><tr><td>Min. podium height (m)</td><td>10.5</td><td>10.5</td><td>10.5</td><td>10.5</td></tr></table>   |      |      |  |  | Requirement   | V1 | V2 | V3 | V4 | Min. podium height (m) | 10.5 | 10.5 | 10.5 | 10.5 | The podium and tower requirements for buildings with a height of 30 m or greater; the setbacks, step backs, and tower floor plate requirements are very restrictive. |  |
| Requirement            | V1                        | V2  | V3   | V4   |  |  |   |    |    |    |    |                        |      |      |      |      |  |  |
| Min. podium height (m) | 10.5                      | 10.5  | 10.5 | 10.5 |  |  |   |    |    |    |    |                        |      |      |      |      |  |  |

| COMMENTS |                | PROPOSED BY-LAW 2020-____<br>SECOND DRAFT  |      |      |      |      |  | RECOMMENDATIONS   |
|----------|----------------|--|------|------|------|------|--|---|
|          |                | Max. podium height (m)   | 20.0 | 14.0 | 14.0 | 14.0 |  | <p>As per the VMC Secondary Plan, flexibility is provided if the applicant can demonstrate that there are no/reduced negative shadow, privacy and/or wind impacts. The specific policy within the Secondary Plan was negotiated at length between the landowners and the City. The key issue was providing flexibility to allow for creative building designs that fits the context of a given site. The parameters established for tower floor plate, setbacks and separation are more onerous than the Secondary Plan. Furthermore, the City has worked collaboratively with the development community throughout the evolution of the VMC on a variety of tower floor plates that exceed what is now being proposed. These projects have been highly regarded and in no way has the larger floor plates diminished the high-quality architecture and design. As such imposing a reduced floor plate restriction now would stifle creative design. The VMC benefits from opportunity for larger than normal tower separations. It is critical the City maintains the flexibility to look at these issues in a holistic nature and review each application on the appropriateness of the design. Imposing these standards will make those discussions and collaborations much more difficult.</p> <p>The City of Vaughan has approved a variety of larger tower floor plate sizes within the VMC, particularly:</p> <ul style="list-style-type: none"><li>• approximately <b>866 sq. m.</b> for Transit City 3, approved by Council May 23, 2017 (file no. OP.17.003, Z.17.027, and DA.17.062)</li><li>• approximately <b>809 sq. m.</b> for Transit City 4, approved by Council May 14, 2019 (file no. OP.18.018, Z.18.030., and DA.17.074)</li></ul> <p>In the above recent examples, SmartCentres was able to demonstrate minimal impact on the public realm. Additionally, Policy 9.2.3.6 from the Vaughan Official Plan permits a maximum floor plate of 850 sq. m above the 12<sup>th</sup> storey, therefore the reduced floor plate permissions of 750 sq. m within the draft By-law remain unclear.</p> <p>Additionally, the tower setbacks pertaining to the lot lines should be removed. SmartCentres is the majority landholder throughout a significant number of these VMC zones, meaning each respective tower proposal's separation distance should primarily be based on other proposals, as opposed to property lines.</p> |
|          |                | Min. tower step-back (m)   | 3.0  | 3.0  | 3.0  |      |  |   |
|          |                | Min. tower separation for residential towers (m)                                     | 25.0 | 25.0 | 25.0 |      |  |   |
|          |                | Min. residential tower setback from any rear lot line and interior side lot line (m) | 12.5 | 12.5 | 12.5 |      |  |   |
|          |                | Min. tower separation for office towers (m)  | 20.0 | 20.0 | 20.0 | 20.0 |  |   |
|          |                | Min. office tower setback from a rear lot line or interior side lot line (m)         | 10.0 | 10.0 | 10.0 | 10.0 |  |   |
|          |                | Maximum residential tower floor plate (sq. m)  | 750  | 750  | 750  |      |  |   |
| 17       | Maps 50 and 51 | N/A  |      |      |      |      |  | OS1 Zone (western flank of site) on Maps 50 and 51, we note the delineation line will move as per Policy 6.2.3 in VMC Secondary Plan. SmartCentres is planning to engineer significant features of open space and will be impacted by features such as the size of the pond. Further rationale is included within the VMC Secondary Plan. Flexibility must exist to modify this boundary at the appropriate time to match Policy 6.2.3 of the VMC Secondary Plan.   |



| COMMENTS |  | PROPOSED BY-LAW 2020-____<br>SECOND DRAFT | RECOMMENDATIONS   |
|----------|--|---|---|
| 18       | VMC Secondary Plan Policies General Comment. | N/A                                       | <p>There are various policies within the VMC Secondary Plan that do not appear to be properly referenced in the comprehensive zoning By-law, including but not limited to:</p> <ul style="list-style-type: none"><li>• Policy 3.4 (University or College Presence);</li><li>• Policies within Section 8.6 (Schedule H) and Policy 8.12;<ul style="list-style-type: none"><li>◦ Flexibility of Active Frontages on Schedule B-1 of draft By-law;</li></ul></li><li>• Policy 8.2.2 (Station Precinct Permitted Uses) and Policy 8.41 (Neighbourhood Precincts Permitted Uses)<ul style="list-style-type: none"><li>◦ Permits multi-townhouse dwellings, therefore should be included as a permitted use within V1 and V2 zones;</li></ul></li><li>• Policy 8.3.1 (South Precinct Permitted Uses)<ul style="list-style-type: none"><li>◦ Preferred location for a post-secondary institution, therefore universities and colleges should be included as a permitted use within the V3 zone.</li></ul></li><li>• Policy 8.3.2 (South Precinct Permitted Uses)<ul style="list-style-type: none"><li>◦ All uses permitted within the Station Precinct shall also be permitted within the South Precinct. Therefore all permitted uses within V1 and V2 zones should be permitted within V3 zone.</li></ul></li><li>• Policy 8.5.1 (East and West Employment Precincts Permitted Uses)<ul style="list-style-type: none"><li>◦ Permits a range of industrial and commercial uses which are not reflected in the proposed V3 zone.</li><li>◦ Retail stores and personal service uses are permitted as an ancillary use where they are integrated into a building, therefore the recommended uses noted in Comment 10 should be included in the next draft.</li></ul></li></ul> <p><b>We request a meeting to review these matters directly with staff.</b> We are concerned about the interpretation and implementation of the Secondary Plan policies with these omissions. As stated previously extensive negotiations occurred between all parties to settle the VMC Secondary Plan. It is essential that nothing in the Secondary Plan is diluted as a result of this proposed By-law.</p> |

March 10, 2020

Brandon Correria – Manager, Special Projects  
City of Vaughan  
Office of the Deputy City Manager, Planning and Growth Management Portfolio  
2141 Major Mackenzie Dr.  
Vaughan, ON  
L6A 1T1

Dear Mr. Correia:

**RE: CITY OF VAUGHAN – COMPREHENSIVE ZONING BY-LAW REVIEW 2<sup>nd</sup> DRAFT COMMENT LETTER  
SMARTCENTRES  
VAUGHAN METROPOLITAN CENTRE & WESTON / 7 SECONDARY PLAN PROPERTIES  
OUR FILE: 07132BA**

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On behalf our client, SmartCentres (through their various ownership corporations), we are providing this letter regarding the second draft of the Comprehensive Zoning By-law (hereinafter the “draft Zoning By-law”) being considered for approval by Council. SmartCentres had provided comments to the City on the first draft of the Comprehensive Zoning By-law on August 14, 2019 (see attached letter).

We provide the following comments for lands located within the Vaughan Metropolitan Centre (approximately 100 acres located north and west of Highway 7 and Jane Street) and their landholdings located in the Weston / 7 Secondary Plan area (Plaza Del Sole, Highway 400 / 7 – approximately 62 acres).

#### **GENERAL COMMENTS**

1. It would be appreciated if a track changed version of the draft by-law noting changes between the first draft (hereinafter “Phase 2A (first draft)”, the second draft (hereinafter “Phase 2B (second draft)”) and in the future subsequent versions be provided.
2. We understand from discussions with City staff that existing site specific permissions will be incorporated over the coming months to reflect the permissions granted through site specific by-law amendments to By-law 1-88. We request being provided these exceptions as soon as they are ready for our review and comment.
3. The draft Zoning By-law has revised the definition for Gross Floor Area. The draft Zoning By-law defines Gross Floor Area as:

“In reference to a building or structure, means the aggregate of the floor areas of all storeys of a building measured from the outside of the exterior walls, but excluding any basement, attic, mechanical room, mechanical penthouse, elevator, elevator shaft, escalators, bicycle parking space, loading space, a dedicated waste storage area, or any portion of a garage or parking structure located above or below grade; or,

In reference to a secondary suite, the aggregate area of that portion of a dwelling devoted to and exclusively used as a secondary suite.”

We believe the following exclusions should be included into the definition of GFA:

- Lockers;
- Mechanical/Electrical shafts;
- Garbage chute;
- Stair shafts;
- Washrooms; and
- Amenity Space required by the By-law

The exclusions listed above are common elements that are not included in the calculation of GFA within other municipalities, such as the City of Toronto. It is our opinion the exclusions above be removed from the calculation of GFA as these are communal spaces for residents and visitors of a development.

4. We appreciate that the City has recognized the transit-oriented nature of the VMC and reduced parking requirements accordingly. Having said this, SmartCentres has provided justification provided by BA Group to further reduce parking requirements through their site specific applications. We request that the City review these reports and adjust required parking accordingly. For example, SmartCentres’ East Block development at 175 Millway Avenue was approved by Council on May 14, 2019 with a reduced parking rate of 0.41 parking spaces per residential unit. In addition to this, Council approved an off-site shared residential, visitor, commercial parking structure, allowing for flexibility, should consumer preferences shift over time.

## **VAUGHAN METROPOLITAN CENTRE LANDS**

5. Given an update to the VMC Secondary Plan is to occur shortly which will likely include numerous changes to the policies affecting development in the VMC, should the City delay implementation of the VMC Zones until the Secondary Plan update occurs? If not, what is the City’s plan for further updating the Comprehensive Zoning By-law once the VMC Secondary Plan review is completed?
6. In addition to our comments on Gross Floor Area above, how is the City implementing the various additional exemptions contained in the VMC Secondary Plan (such as set out in Policy 8.1.19) in the draft By-law? Further how is the calculation of density (Floor Space Index) as outlined in the VMC Secondary Plan policies being implemented in the draft By-law? How is the City intending to implement a number of the other density and height policies?
7. It appears that SmartCentres comments regarding land uses in the VMC Zones (V1 to V4) have not been addressed. We reiterate that the VMC Secondary Plan provides for the broadest range of uses in the City and this should be incorporated into the VMC Zones accordingly to encourage a diverse, mixed use community that is adequately able to response to market conditions.



8. As per SmartCentres August 14, 2019 submission letter (**Appendix A**), it does not appear that the restrictions on permitted uses have been modified. We again request further discussion on these restrictions.
9. It appears that SmartCentres comments on lot and building standards in the VMC Zones have not been addressed. We reiterate these comments and request further discussion on the issues raised previously.
10. We request that the City provide its mapping in AutoCAD such that an overlay of the mapping on the existing or under construction road network within the VMC can be verified. Further we question the inclusion of roads which, while proposed in the VMC Secondary Plan are not yet built at this time. It would be more appropriate to modify the road mapping base as the blocks within the VMC are approved / developed. For example the current base mapping does not reflect the approval by Council on May 14, 2019 of the East Block lands where the roads have been modified.
11. The definitions of Active Use Frontage (required) and Active Use Frontage (convertible) are unclear and do not provide the flexibility as outlined in the VMC Secondary Plan (Policies under Section 8.6).
12. As discussed in SmartCentres previous comments, the inclusion of Landmark Location provisions in By-law 1-88 should be brought forward into the draft By-law. SmartCentres is not supportive of the exclusion of these provisions from the draft By-law, which if excluded, essentially downzones the Landmark Locations that is inconsistent with provincial policy related to urban growth centres and Major Transit Station Areas.

## **WESTON / 7 SECONDARY PLAN AREA LANDS**

13. The SmartCentres lands within the Weston / 7 Secondary Plan Area are proposed to be zoned General Mixed Use (GMU) in the draft By-law. The GMU Zone does not reflect the current designations in VOP2010 nor the current applications filed for the Highway 400 / 7 lands. Further the Weston / 7 Secondary Plan is still underway and likely will provide additional details for height, density and permitted uses which the GMU Zone does not reflect. We therefore request that the draft By-law exclude the Weston / 7 Secondary Plan Area lands until such time as the Secondary Plan is completed. Should the City not exclude these lands, we request that the draft By-law implement the VOP2010 designations for the Plaza del Sole lands (a MMU Zone would be appropriate). To zone the lands GMU Zone would not be consistent with VOP2010. We also recommend the list of existing uses be included as permitted uses subject to regulation 2.5.1.4 in the draft Zoning By-law.

Our client reserves the right to provide further comments on the draft By-law.

We would be pleased to discuss our comments further and work with City staff to come to resolution on the above noted items.

Thank you.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'David A. McKay', written over the printed name.

David A. McKay, BES, MSc, MLAI, MCIP, RPP  
Vice President and Partner

cc. *Client*

# Appendix **A**





**SMARTCENTRES®**

3200 HIGHWAY 7 | VAUGHAN, ON. CANADA L4K 5Z5  
T 905 326 6400 F 905 326 0783

August 14, 2019

Mr. Brandon Correria  
Manager, Special Projects  
City of Vaughan  
2141 Major Mackenzie Drive  
Vaughan, ON L6A 1T1

Dear Mr. Correria:

**RE: SMARTCENTRES  
VAUGHAN COMPREHENSIVE ZONING BY-LAW - COMMENTS**

---

SmartCentres is pleased to provide the following comments on the First Draft of the City of Vaughan Comprehensive Zoning By-Law. We and our consultants have participated in the entirety of the public process to date. We look forward to working with staff to address our concerns prior to the finalization of this By-Law.

SmartCentres owns over 250 acres of land in the City of Vaughan, including 100 acres in the Vaughan Metropolitan Centre (VMC). We have worked closely with City staff for many years on the advancement of various planning policies and significant development proposals throughout the City of Vaughan. We have always strived to work collaboratively with the City of Vaughan including the significant developments we have advanced within the VMC.

#### Existing Site-Specific Planning Permissions

Our landholdings include a wide variety of properties throughout the City and all these sites have been subject to site specific planning permissions. Our existing properties (which include multiple landholdings) include:

- VMC (100 Acres) – Site bounded by Highway 7 to the south, Jane Street to the east, Portage to the north, Highway 400 to the west
- Applewood Cres (15 acres) – located north of Portage on the west side of Applewood Cres
- Highway 400 / Highway 7 (22 acres) – Site bounded by Highway 400 to the east, Highway 7 to the south, Northview Blvd to the north and west, Chrislea Rd to the north

- Plaza Del Sole (40 acres) – Site bounded by Weston Rd to the east, Highway 7 to the south and Fieldstone Dr to the north.
- Thornhill (20 acres) – Northwest corner of Bathurst St and Centre St
- Vaughan 427 & 7 (13 acres) – bounded by Hwy 427 extension to the east, Hwy 7 to the south, New Huntington bisects lands
- Vaughan NW (42 acres) – northeast corner of Major Mackenzie and Weston Road
- Rutherford Village (10 acres) – southwest corner of Bathurst & Rutherford

SmartCentres has worked with the City of Vaughan and the broader community to achieve extensive planning permissions for each of these sites. The result has been many site-specific zoning by-laws that have been implemented throughout the last 20 years. Some by-laws were approved and enacted as recently as June 2019 yet are not noted in anyway in the Comprehensive Zoning By-law. It is unclear to us how the implementation of this Comprehensive By-Law will deal with site specific zoning by-laws for our individual properties and how these exemptions will be integrated in the context of this By-Law. Further, the reduction or modification of any existing permission from our site-specific exemptions would be of grave concern to us if that is what is being proposed.

**We respectfully request a working session with City staff to discuss our site specific polices and the integration and implementation with this proposed By-Law.**

In addition to our concerns above we also need to understand how the Comprehensive Zoning By-Law will integrate with other planning processes that are underway. For example, we have been actively participating in the Weston Road and Highway 7 Secondary Plan process. We presented at the Committee of the Whole Working Session in May 2019 and provided a written submission outlining our concerns with the homogenous land use permissions being proposed in context of the site location adjacent to rapid transit. We urged for more flexibility and a broader spectrum of uses to be permitted including residential. We were advised that these uses would be reconsidered in Phase 2 of the Secondary Plan process. The current version of the Comprehensive Zoning By-law contemplates extremely restrictive permissions on these lands. **We would therefore like to understand the City's plan to augment and update the Comprehensive Zoning By-Law as new planning policies such as the Weston Road Secondary Plan come into effect to ensure consistency.**

Lastly, some of our properties have been the subject of proposed intensification. We would like the opportunity to discuss the appropriateness of the heights and densities being proposed for each of these sites and the rationale for different zone categories on these properties. **We feel a working session with staff would be most beneficial to discuss these granular matters.**

#### Vaughan Metropolitan Centre

SmartCentres owns 100 acres in the heart of the VMC and has advanced over 3.3 million sf of developments in the VMC to date. We have worked closely with the City on the development of the VMC Secondary Plan and worked through the extensive mediation process with the City and other landowners.

Through our review of the VMC portions of the Comprehensive Zoning By-Law we are concerned that in some cases a more restrictive and prescriptive approach has been taken than when compared with the VMC Secondary Plan. The VMC Secondary Plan was negotiated over many years with all parties and a key component of the final settlement was appropriate and measured

flexibility in the policies. We have also completed 5 separate site-specific zoning by-laws within the VMC lands that have worked within the approved policies of the VMC Secondary Plan. In all cases there has been a flexible approach to development standards.

**We are concerned that a prescriptive and restrictive approach to the Comprehensive Zoning By-Law could stifle the creative and collaborative approach to City building that has been occurring in the VMC.** As a starting point, we ask that you reconsider the following (we will present additional comments at our meeting with City staff):

#### 10.2 – Permitted Uses

- Overall, there is significant variation and differences between VMC1, VMC2, VMC3, and VMC4. These differences are inconsistent and lack rationale and don't allow a broad range of uses, as contemplated in the VMC Secondary Plan.
- Permitted uses in VMC3 (Neighborhood Precinct) are too restrictive. A broader spectrum of uses should be permitted within these lands. The VMC Secondary Plan (Policy 8.4.1) permits retail, service, and commercial uses as complimentary / ancillary uses if it is deemed appropriate and conforms with VMC Secondary Plan Policy 8.6 (retail requirements).
- Further to the above, why are college / university uses not permitted within VMC3 and VMC4?
- Why is public parking not permitted within VMC3? This proposed policy does not contemplate the emerging / shifting trends in people's personal behaviors and preferences. There is a growing need to provide public parking or shared parking opportunities.
- Note No. 3 should be deleted. What is the rationale of permitting only Ground Floor commercial uses? Furthermore, we would like to discuss the proposed 10% GFA restriction.
- Note No. 4 should be deleted. This policy / note in conjunction with Schedule B-1 does not match the intent of the VMC Secondary Plan. Please see Schedule 'H' of the Secondary Plan, which is not intended to be a prohibitive schedule. This policy is overly restrictive within the lands designated as VMC3.
- Note No. 5 is unclear. What is the rationale? This condition exists within the Transit City Condominiums (TC1 and TC2). Perhaps a capped percentage can be included, should the City of Vaughan wish to limit the uses.
- Note No. 6 is unclear and too restrictive. What is the rationale for limiting and prescribing specific uses on corner lots only?

#### 10.3 – Lot and Building Requirements for the VMC Zones

- Note No. 2 includes a higher setback than would typically be required. What is the rationale for the exact nominal measurement?
- Podium and Tower Requirements for Buildings with a Height of 30m or Greater: the setbacks, step backs, and tower floor plate requirements are very restrictive, and flexibility is desired if SmartCentres can demonstrate there are no / reduced negative shadow, privacy, and wind impacts. The City of Vaughan has approved a variety of higher tower floor plate sizes (ranging from 1,570 sq. m. to 2,520 sq.

m.) as SmartCentres demonstrated minimal impact on the public realm. Additionally, policy no. 9.2.3.6 from the Vaughan Official Plan permits a maximum of 850 sq. m. above the 12<sup>th</sup> storey so the reduced floor plate permissions remain unclear.

### VMC By-Law Mapping

#### *MAPS 50 and 51*

- OS1 Zone (western flank of site): the delineation line will move, as per policy 6.2.3 in VMC Secondary Plan. SmartCentres is planning to engineer significant features of the Open Space and will be impacted by features such as the size of the pond. Further rationale is included within the VMC Secondary Plan. Flexibility must exist to modify this boundary at the appropriate time to match policy 6.2.3 of the Secondary Plan

#### *Schedule B-1*

- Base Mapping in the VMC is incorrect and should reflect existing and planned road networks. In particular, SmartCentres is building Applewood Crescent which is not properly shown.
- What is the definition of “Active Use Frontage (convertible)”?

### Definitions

- GFA – SmartCentres has discussed the definition of GFA with the City on many occasions. In light of this current zoning review we would like to have a further discussion about the definition and proposed exclusions to match how GFA is defined in other urban municipalities.

### VMC Secondary Plan

There are various policies within the VMC Secondary Plan that do not appear to be properly referenced in the Comprehensive Zoning By-Law. We request a meeting to review these matters directly with staff. We are concerned about the interpretation and implementation of the Secondary Plan policies with these omissions. As stated previously extensive negotiations occurred between all parties to settle the VMC Secondary Plan. **It is essential that nothing in the Secondary Plan is diluted as a result of this proposed by-law.**

### Current Zoning Provisions – Landmark Provisions

SmartCentres request that the existing landmark provisions from schedule A2 of the Zoning By-Law 1-88 that pertain to gateway locations along Highway 7 be carried forward in the Comprehensive Zoning By-Law. The City has already approved some development applications within these locations (and within the landmark provision policies) and it is critical that these permissions are carried forward for consistency.



## Conclusion

SmartCentres is generally supportive of the Comprehensive Zoning By-Law and are appreciative of the efforts by staff to bring this forward. We would like the opportunity to meet with staff to discuss the issues above. We look forward to continuing to work with staff in a collaborative manner to facilitate high quality developments throughout the City of Vaughan.

Thank you,



Paula Bustard  
Senior Vice President, Development

cc: David McKay, MHBC



**SMARTCENTRES®**

3200 HIGHWAY 7 | VAUGHAN, ON. CANADA L4K 5Z5  
T 905 326 6400 F 905 326 0783

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2141 Major Mackenzie Drive  
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There are various policies within the VMC Secondary Plan that do not appear to be properly referenced in the Comprehensive Zoning By-Law. We request a meeting to review these matters directly with staff. We are concerned about the interpretation and implementation of the Secondary Plan policies with these omissions. As stated previously extensive negotiations occurred between all parties to settle the VMC Secondary Plan. **It is essential that nothing in the Secondary Plan is diluted as a result of this proposed by-law.**

### Current Zoning Provisions – Landmark Provisions

SmartCentres request that the existing landmark provisions from schedule A2 of the Zoning By-Law 1-88 that pertain to gateway locations along Highway 7 be carried forward in the Comprehensive Zoning By-Law. The City has already approved some development applications within these locations (and within the landmark provision policies) and it is critical that these permissions are carried forward for consistency.



## Conclusion

SmartCentres is generally supportive of the Comprehensive Zoning By-Law and are appreciative of the efforts by staff to bring this forward. We would like the opportunity to meet with staff to discuss the issues above. We look forward to continuing to work with staff in a collaborative manner to facilitate high quality developments throughout the City of Vaughan.

Thank you,



Paula Bustard  
Senior Vice President, Development

cc: David McKay, MHBC