SPECIALIST IN LAND
MANAGEMENT + DEVELOPMENT

January 16th, 2026

Ministry of Municipal Housing Affairs
Municipal Services Office – Central Ontario
777 Bay Street, 16th floor
Toronto, ON M7A 2J3

Re: Comment Submission for the Weston 7 Secondary Plan
City of Vaughan Official Plan, ERO 025-1420
Weston 7 Landowners Group Inc.

Delta Urban Inc. is Group Manager for the Weston 7 Landowners Group Inc. ("W7LOG" or "Group"), comprised of various landowners within the boundaries of the Weston 7 Secondary Plan ("W7SP") in the City of Vaughan, as identified in **Appendix A.**

On October 28, 2025, the City of Vaughan adopted the Vaughan Official Plan 2025 ("VOP 2025") and a Notice of Adoption was issued on November 4, 2025. VOP 2025 establishes a city-wide policy framework to guide growth and development to the year 2051 and concurrently incorporates a Secondary Plan for the Weston 7 area in the City of Vaughan. Weston 7 area has been designated as a Primary Centre and contains two (2) Protected Major Transportation Station Areas (PMTSA) on the Highway 7 BRT system, and as such, intensification is appropriate and consistent with the provincial policies and the PPS.

On September 29, 2025, Delta Urban Inc., on behalf of the W7LOG, filed a letter to Mayor Del Duca and Members of Council outlining ongoing key issues identified with the Weston 7 Secondary Plan; these points were further presented to Council in a deputation during the September 30th Committee of the Whole meeting.

Please find enclosed the comment submission made to Vaughan Council on the Weston 7 Secondary Plan as **Appendix B;** these comments are applicable to the ERO 025-1420 posting**.** Previous submissions made by the Group are further attached as **Appendix C** and outline the consistency in issues raised and comments made by the Group on the policies in the Weston 7 Secondary Plan.

It is our opinion that these issues need to be resolved to deliver a Secondary Plan that is equitable, achievable and gives the landowners the tools needed to deliver housing to the Weston 7 area.

Sincerely,

Ore Alade, B.E.S.
Project Manager III
Delta Urban Inc. *On behalf of the Weston 7 Landowners Group.*

Encl. ***Appendix A –*** *Participating Landowners within the Weston 7 Landowners Group*
Appendix B – *September 29th 2025 Weston 7 Secondary Plan Comment Letter*
Appendix C – *Previous Correspondence submitted to City Staff and/or Council regarding the Weston 7 Secondary Plan on behalf of the Weston 7 Landowners Group*

8800 Dufferin St. Suite 104 T 905-660-7660
Vaughan, Ontario L4K 0C5 F 905-660-7076

Appendix A

Weston 7 LOG - Participating Landowners
2371933 ONTARIO INC.
CANADIAN TIRE PROPERTIES INC.
GALLU CONSTRUCTION INC.
KINGSMOOR DEVELOPMENTS INC.
MARINO ON 7 INC.
PEM (WESTON) LIMITED PARTNERSHIP
PEM (WESTON) GP INC.

Appendix B

SPECIALIST IN LAND
MANAGEMENT + DEVELOPMENT

September 29th, 2025

Via Email to: clerks@vaughan.ca
council@vaughan.ca

City of Vaughan
Mayor Del Duca and Members of Council
Attn: Todd Coles, City Clerk
2141 Major Mackenzie Drive
Vaughan, ON L6A 1T1

Re: Weston 7 Secondary Plan
Weston 7 Landowners Group Inc.

I am writing as the Group Manager on behalf of the registered landowners within the Weston 7 Landowners Group ("W7LOG" or "Group"), which is comprised of various landowners within the boundaries of the Weston 7 Secondary Plan ("W7SP") in the City of Vaughan, as identified in **Schedule A**.

The W7SP process was initiated by the City of Vaughan in 2018 following a Council resolution in 2017. Drafts #1 and #2 were released in August and October 2023 respectively, with Draft #2 presented to Council at the Committee of the Whole Public Meeting in November 2023. At that time, Council referred the Secondary Plan back to staff to address comments received from the public and landowners and recognized the need to complete the supporting Transportation Master Plan and Servicing Reports prior to advancing the plan for Council's final consideration.

In January 2024, at the ***encouragement*** of City staff and Members of Council, the W7LOG was established to streamline landowner engagement, consolidate technical and policy feedback, and support a more coordinated dialogue with the City. Since its formation, the Group has incurred significant cost in effort of providing detailed submissions and participating in ongoing discussions on key matters including transportation, servicing, and growth allocations. For reference, **Schedule B** includes previous correspondence submitted to the City by the Group's planning and legal representatives, outlining the collective comments and recommendations of the participating landowners.

At the June 5, 2024 Committee of the Whole Meeting, a representative of the W7LOG provided a deputation acknowledging the progress made to date, while also noting outstanding matters that require further attention. The Group reaffirmed its commitment to continued collaboration and to working constructively with staff to ensure the Secondary Plan achieves a balanced framework that supports sound planning principles and practical implementation.

Despite these ongoing efforts, a number of key issues raised by the Group remain unresolved—most notably the proposed **growth threshold**. The significant reduction in the growth target for the W7SP area (from 54,000 to 26,000 people/jobs in Draft #4) has created uncertainty for landowners and may constrain the area's long-term development potential. The Group has submitted policy language designed to introduce flexibility—specifically, mechanisms that would allow for future adjustments to the growth limit without requiring a formal amendment—but to date, these proposals have not been reflected in subsequent drafts.

Additionally, the ratio of people to jobs (16,000 people and 10,000 jobs) results in jobs accounting for 38% of the total growth within the W7SP. As an area like Weston 7 builds out, a critical mass of population is required to support non-residential uses. This ratio further does not reflect the existing non-residential uses within Weston 7 which will likely continue to operate for some time given the low growth threshold.

Given the importance of providing clarity and predictability to all stakeholders, the W7LOG believes that further dialogue on this matter is essential to ensure the final plan is both **policy-sound and implementation-ready**.

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Vaughan, Ontario L4K 0C5 F 905-660-7076

While the Group remains committed to constructive engagement, the limited progress on certain key items has understandably led some landowners to pursue independent representation by exiting the Group. This is regrettable, given the considerable effort and cost invested in assembling a coordinated position that, at its peak, represented approximately **90% of the W7SP area**; whereas now, the participating members represent only **45%.**

In addition to the growth threshold, the W7LOG continues to have concerns with elements of the 'final' version of the W7SP, including:

High Rise I & II – The Secondary Plan places height restrictions for High Rise I & II buildings within the Weston 7 area without policy permitting increases to these maximums if they can be proven to be compatible and of sound planning & design. Further, these designations are located at the southern, westerly and easterly gateways to the Secondary Plan area and, as such, can support additional heights which staff supported in previous iterations of the Secondary. We request that these clauses be reintroduced to the Secondary Plan as they were removed without explanation or discussion

- ***Block Plans*** – The Secondary Plan notes that prior to any development within Weston 7 being approved, a Block Plan is to be prepared, to the satisfaction of the City, that addresses the complexities of comprehensive planning within the Quadrant. While Block Plans may help in this regard, this does not consider scenarios whereby a significant portion of a Quadrant is unwilling to participate or whose development timeline is significantly outside the applicant making it difficult to implement. We ask that this requirement be removed, or considerable flexibility be introduced to allow development applications to be proceed unencumbered.

- ***Mixed-Use I*** – The Secondary Plan introduces a minimum requirement of 15% of all gross floor area (GFA) within a development application be non-residential land uses. This requirement is significantly higher than other areas within the City of Vaughan where even greater densities are planned. A Secondary Plan is intended to be a high-level policy document and should not include prescriptive numerical maximums or minimums; this is more appropriate to be included in the implementing by-law.

- ***Floor Space Index (FSI)*** – The Secondary Plan, by virtue of the VOP 2025, continues to provide policy direction to calculate FSI on a net rather than on a gross basis. The calculation of FSI on a gross basis reduces the amount of coordination required among landowners which encourages the delivery of public infrastructure including roads and parks.

The Group remains fully committed to working in partnership with Council and City staff to resolve these matters and to deliver a Secondary Plan that is **equitable, achievable, and aligned with the City's and W7LOG's long-term planning vision**.

Sincerely,



Ore Alade, B.E.S.
Project Manager III
Delta Urban Inc. *On behalf of the Weston 7 Landowners Group.*

Encl. ***Appendix A –*** *Participating Landowners within the Weston 7 Landowners Group*
Appendix B – *Correspondence submitted to City Staff and/or Council regarding the Weston 7 Secondary Plan on behalf of the Weston 7 Landowners Group*

Weston 7 LOG - Participating Landowners

2371933 ONTARIO INC.
CALLOWAY REIT (400 AND 7) INC.
CALLOWAY REIT (WESTRIDGE) INC.
CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
CANADIAN TIRE PROPERTIES INC.
CP REIT ONTARIO PROPERTIES LIMITED
GALLU CONSTRUCTION INC.
KINGSMOOR DEVELOPMENTS INC.
MARINO ON 7 INC.
PEM (WESTON) LIMITED PARTNERSHIP
PEM (WESTON) GP INC.

Appendix C

SPECIALIST IN LAND
MANAGEMENT + DEVELOPMENT

May 1st, 2024

Lina Alhabash
Senior Planner, Policy
Planning & Special Programs
City of Vaughan
2141 Major Mackenzie Drive
Vaughan, ON L6A 1T1

Re: Draft #2 Weston 7 Secondary Plan
Redlining of Secondary Plan Policies

Delta Urban Inc. is the Group Manager for the Weston 7 Landowners Group ("W7 LOG"), formed of various owners of lands within the boundaries of the Weston 7 Secondary Plan ("W7SP").

As was previously discussed with the City of Vaughan, the W7 LOG has created a redlined chart of the Weston 7 Secondary Plan policies (Attachment A). The chart outlines all policies within the Secondary Plan, our suggested changes/revisions as well as our rationale for each.

The intent of the proposed modifications was to foster further discussion with the City on the overarching goals and objectives of the W7SP. The proposed modifications seek to provide more flexibility within the policies to minimize future site-specific Official Plan Amendments, while planning for appropriate growth within this area. In order to achieve this objective, we have proposed the removal of overly prescriptive language in favour of using the City's existing guidelines and site-specific zoning applications to guide development. Wherever possible, we have drawn upon the City's existing and approved Secondary Plans such as the VMC Secondary Plan and Yonge Steeles Secondary Plan the use of these policies was to ensure that the W7SP is consistent with and build upon the successful development principles from other areas in the City.

Other changes proposed include recognition of the existing uses within the Secondary Plan area and policies permitting them to continue their operation – including expansions, once the Secondary Plan is in effect.

Please note the W7 LOG has not provided consolidated comments on the Secondary Plan schedules but intend to do so as part of this exercise.

We trust the enclosed Redlined document is cohesive and will foster constructive conversations between the W7 LOG and City of Vaughan staff.

Sincerely,

Ore Alade, B.E.S.
Project Manager II
Delta Urban Inc.

On behalf of the Weston 7 Landowners Group.

8800 Dufferin St. Suite 104 T 905-660-7660
Vaughan, Ontario L4K 0C5 F 905-660-7076

TMA LAW

Scott Snider
Professional Corporation
Shelley Kaufman
25 Main Street West, Suite 2010
Hamilton Ontario Canada L8P 1H1
Tel: 905 529-3476
ssnider@tmalaw.ca
skaufman@tmalaw.ca

January 21, 2025

Via Email to: clerks@vaughan.ca; council@vaughan.ca

City of Vaughan
Mayor Del Duca and Members of Council
Attn: Todd Coles, City Clerk
2141 Major Mackenzie Drive
Vaughan, ON L6A 1T1

Attention: Mayor Steven Del Duca and Members of City of Vaughan Council

Re: Weston 7 Secondary Plan
City of Vaughan
Weston 7 Landowners Group
Our File No. 13729

We are counsel to the Weston 7 Landowners Group (the "W7LOG"). The W7LOG formed in January of 2024 at the request of the City of Vaughan ("City") to help coordinate input on the Weston 7 Secondary Plan ("W7SP" or "Secondary Plan") process. The W7LOG includes the following individual landowners representing approximately 88% of the W7SP area (175.87 of 199 acres): **(Ownership Map attached)**

- 1493130 Ontario Limited,
- 2371933 Ontario Inc.,
- Dev-West Properties Inc.,
- Calloway Reit (400 and 7) Inc.,
- Calloway Reit (Westridge) Inc.,
- Canadian Property Holdings (Ontario) Inc.,
- Canadian Tire Properties Inc.,
- Costco Wholesale Canada Ltd.,
- CP REIT Ontario Properties Limited,
- Gallu Construction Inc.,
- Kingsmoor Developments Inc.,
- Marino ON 7 Inc.,
- Pem (Weston) Limited Partnership,

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- Pem (Weston) GP Inc.,
- RioCan Real Estate Inv Trust,
- Riotrin Properties (Vaughan 3) Inc.,
- Sky Property Group Inc.,
- N.H.D. Developments Limited (formerly Wedgewood Columbus Limited)[1]

The W7LOG (on behalf of its constituent members) is writing to Council directly to ensure its voice is heard by the representatives who ultimately determine the direction of this Secondary Plan. Our client is very motivated and dedicated to collaborating with the City on the Secondary Plan. It is concerned that Council may be hearing a rhetoric inconsistent with its dedication. The W7LOG does not expect to have all its input incorporated. The group knows this is an iterative process with various stakeholders. The W7LOG has worked hard to narrow the focus of its concerns. Our client is willing to continue to do the work that is necessary to address Council's concerns.

W7LOG's Request

To that end, the W7LOG has one specific request at this time: that Council defer any further consideration of the Secondary Plan until the group has submitted its traffic review to address the draft Weston 7 Transportation Master Plan (2024) ("TMP"). It is clear that the transportation challenges identified in the TMP are the critical issues affecting Council's approach to central assumptions in the Secondary Plan. Council should hear from the landowners directly affected by those assumptions before making any final policy decisions. It is not enough to suggest that these policies can be re-visited at some future date. Such an approach would be neither fair nor offer the possibility of a timely resolution of these issues. Planning policy must always be based on the best information and analysis. Our client wishes to engage those issues as part of the current secondary plan approval process.

Discussion

Since its formation, the W7LOG has undertaken a continued effort to engage with the City to provide input into the Secondary Plan through both the group's representatives at Delta Urban Inc., the group's and the constituent members' planning, transportation engineering and civil engineering consultants, as well as individual landowner representatives. Such engagement includes written correspondence, with W7SP redlined comments, making oral submissions before the Committee of the Whole ("COW") and attending Public Information Consultation ("PIC") meetings. The group has met numerous times with City staff and its consultants and corresponded regarding updates, requests for information and access to data. Individual landowners have been involved in the W7SP process since as early as 2012.

[1] *Nothing in this correspondence derogates, or is intended to derogate, from the position taken by Wedgewood Columbus Limited in the ongoing OLT proceeding File No. OLT-22-004652.*

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The W7LOG appreciates the time the City has taken to engage with the group and its representatives. However, this process has been frustrated by the apparent unwillingness, or lack of direction by the City, to provide timely and substantive feedback to the W7LOG or to engage in meaningful back and forth discussions to land at final policies. In fact, draft #4 of the W7SP was released on November 21, 2024, without any advance notice despite our client actively requesting that the City advise when a revised draft would be released. We understand that subject to one memo from the outside consultant to the City's senior planner copied to our client in May, there have been essentially no written responses to the input provided and no red-lined revisions to subsequent draft plans or reports to explain the revisions. The W7LOG expects to receive formal responses to the letters submitted to the City and a redlined version of Draft #4 which would facilitate an easier comparison to earlier drafts, as has been and continues to be the City's typical practice regarding both Secondary Plan and Official Plan Review processes. We understand responses to data requests dating back to February of 2024 have not been timely. While some information was provided in August, there are still outstanding requests that need to be addressed.

The Weston 7 experience directly contrasts with previous experience landowners in the group have had working collaboratively with the City. Our client is at a loss to understand why the City asked that they form a group to provide coordinated landowner input, when there appears to be so little interest in true collaboration. Significant time and costs have been dedicated to this by the landowners and their consultants. The W7LOG wants to work with the City to provide steady long term planned growth for the W7SP area.

Draft #4 made fundamental changes to the W7SP by removing detailed references to long-term planning and restricting development to the Growth Threshold identified in the draft TMP of 26,000 people and jobs from the overall build out in draft #3 of 54,500 people and jobs. Also maintained was an Official Plan Amendment ("OPA") requirement which would now apply for any increase to these reduced numbers. We are advised that this occurred despite active discussions about the potential for an even higher people and jobs threshold than 54,500. To be clear, this discussion was about a number that was lower than the threshold our client believes is appropriate, but one which the W7LOG could work with as a compromise. Furthermore, we understand that the City suggested the next draft would reflect increased growth numbers at the October 2024 PICs. As a result, the W7LOG was particularly surprised to see the 54,500 people and jobs number substantially reduced.

The W7LOG understands the need for alternative analysis to support the development ambitions of the landowners and has been willing to prepare additional study to address servicing and transportation capacity issues. However, efforts to collaboratively study and discuss these issues have been impacted by the lack of data from the City or the Region. With regards to servicing, data requests for the City's servicing model date back to March of 2024. The requested data was never provided and an MOU for the Sanitary and Water Supply models remains incomplete since November of 2024. With regards to transportation, the transportation consultants working on behalf of the W7LOG highlighted potential issues with the City's approach to transportation modelling. The W7LOG is reviewing the transportation model, but

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such work is costly and time-consuming. Our client has requested assurance that the alternative analysis will be duly considered by staff. Our request that further consideration of the Secondary Plan be deferred until that work is completed is consistent with a truly collaborative planning process that is based on the best information and analysis.

The City acknowledges that the Secondary Plan area will be built out and grow over a long period of time, yet the proposed Growth Threshold is only to 2041. It is our client's opinion that long-term planning is the proper approach to take in the final W7SP to ensure it extends to the life of its build out. The W7SP area is in a Primary Centre in the Vaughan Official Plan and it includes two PMTSAs. It is intended to be planned for intensification. Proper vision and long-term planning in this location should not be limited by overly prescriptive policies requiring limits on growth or an OPA requirement to increase any growth threshold. The Plan should include the possibility for such growth where infrastructure or servicing capacity concerns are addressed, which the W7LOG has consistently requested in its comments to Staff, but which Staff has not supported.

In addition to these fundamental growth threshold issues, the W7LOG and its constituent landowners continue to have concerns with other aspects of the proposed plan, including:

- *Merit-Based Allocation* – The merit-based allocation program contains ambiguities that are fundamentally at odds with an allocation program whereby the delivery of specific infrastructure is tied to specific density permissions. The proposed additional layer of servicing capacity allocation beyond meeting the tests of good planning is not appropriate for a Secondary Plan document.

- *Gross vs. Net Density Calculation* – The current density calculation methodology in the Secondary Plan may create more issues related to conflict and resistance to providing public benefits as they are calculated net of said public benefits i.e. POPS, parkland, and roads. A gross density definition can help make the development process run in a smoother, less litigious way, that avoids these issues.

- *Non-Residential Requirements* – Requiring 15% & 20% of total GFA and 75% of ground floor GFA to be non-residential and requiring non-residential uses at grade along all Enhanced Urban Streetscapes results in too large of a non-residential space within a mixed-use area and can lead to empty non-residential spaces that detract from the vibrancy and viability of the area. Where blocks are planned comprehensively, a mixed-use neighbourhood can still be achieved where standalone residential and non-residential buildings can be delivered adjacent to one another.

Ultimately our client is seeking a plan that ensures the long term build out of the Secondary Plan area. The W7SP area should not be kept under the equivalent of a development freeze. The Weston 7 Secondary Plan area needs the opportunity to grow. This is clearly aligned with the Provincial mandate to build more housing faster. Our client has been ready and willing to work collaboratively with the City throughout this process.

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Again, we respectfully request that Council defer further consideration of the Secondary Plan until it has received our client's traffic review of the TMP which is central to the current draft. This will demonstrate that Council is serious about not only making the best policy choices, but also engaging with the W7LOG in a truly collaborative planning process.

Yours truly,

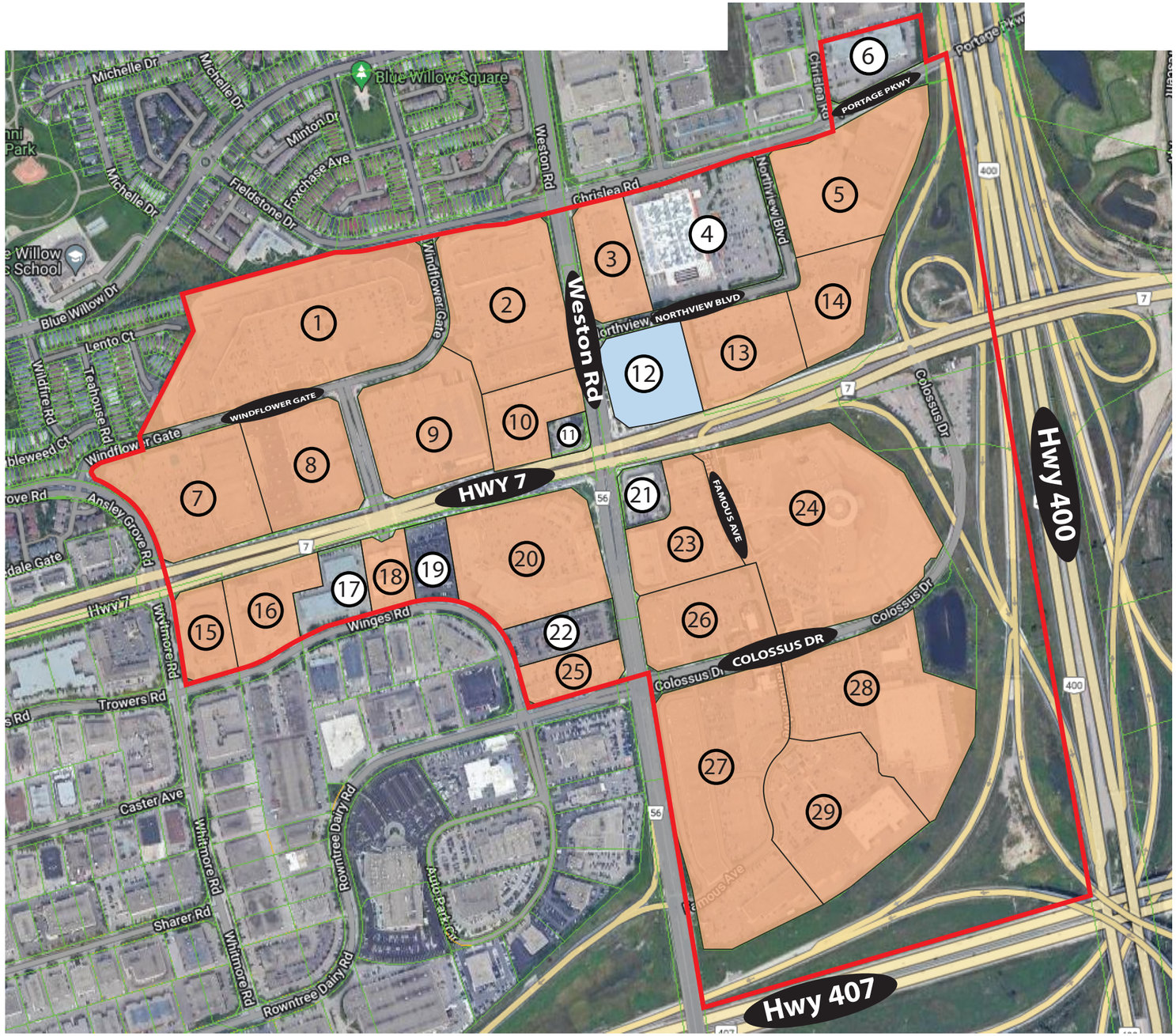
Scott Snider

Yours truly,

Shelley Kaufman

Sk:ss:nd
Att'd.
13729/3

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Weston 7 Landowners Group Ownership Map

No.	Ownership Name	Common Name	Gross Area (ac)
1	CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	19.30
2	CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	10.84
3	N.H.D. DEVELOPMENTS LIMITED	Sorbara	4.14
4	HOME DEPOT HOLDINGS INC.	Home Depot	10.02
5	CALLOWAY REIT (400 AND 7) INC.	Smart Centres	9.65
6	167 CHRISLEA ROAD HOLDINGS INC.		3.44
7	CP REIT ONTARIO PROPERTIES LIMITED	Choice	8.89
8	CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	6.76
9	CANADIAN TIRE PROPERTIES INC.	Canadian Tire	8.22
10	PEM (WESTON) LIMITED PARTNERSHIP; PEM (WESTON) GP INC.	Pemberton	3.65
11	MAC'S CONVENIENCE STORES INC.	Mac's	0.75
12	1857307 ONTARIO INC.	Liberty	4.80
13	CALLOWAY REIT (400 AND 7) INC.	Smart Centres	5.78
14	CALLOWAY REIT (400 AND 7) INC.	Smart Centres	4.68
15	KINGSMOOR DEVELOPMENTS INC.	Trinity Point	2.82
16	GALLU CONSTRUCTION INC.	ARG	3.96
17	Condominium		2.71
18	MARINO ON 7 INC.	Marino	1.91
19	Condominium		1.97
20	DEV-WEST PROPERTIES INC.	Morguard	10.05
21	SUNCOR ENERGY INC.	Suncor	1.58
22	Condominium		2.68
23	RIOTRIN PROPERTIES (VAUGHAN 3) INC.	RioCan	5.57
24	1493130 ONTARIO LIMITED	RioCan	20.14
25	2371933 ONTARIO INC.	Sky Property Group	2.47
26	RIOTRIN PROPERTIES (VAUGHAN) INC.	RioCan	6.09
27	RIOTRIN PROPERTIES (VAUGHAN2) INC.	RioCan	17.29
28	COSTCO WHOLESALE CANADA LTD.	Costco	13.08
29	1493130 ONTARIO LIMITED	RioCan	10.58

Total Participating Owners	175.87
Total Non-Participating Owners	23.14
TOTAL *	**199.00**

* Does not include Liberty (Parcel No.12)

Legend

- Weston & 7 Secondary Plan Boundary
- # Parcel Number
- Exempt Owner
- Participating Owner
- Non-Participating Owner

N

Job No.
File No.

Description: Weston & 7 Secondary Plan Ownership Map

Municipality: Vaughan, Ontario
Region of York

DELTA URBAN
8800 Dufferin St, Suite 104
Vaughan, Ontario L4K 0C5

Source: Geowarehouse

Date: June 24, 2024

64 JARDIN DRIVE, UNIT 1B
CONCORD, ONTARIO L4K 3P3

T 905.669.4055

KLMPLANNING.COM

File: PRO-546

June 3, 2025

Via e-mail to weston7@vaughan.ca; clerks@vaughan.ca

City of Vaughan
Region of York
2141 Major Mackenzie Drive
Vaughan, ON, L6A 1T1

Attention: **Hon. Mayor Del Duca and Members of City of Vaughan Council**

Re: **Weston 7 Secondary Plan Draft #5**
City of Vaughan, Region of York
Comments from Weston 7 Landowners Group and individual registered landowners

KLM Planning Partners Inc. is the land use planning consultant representing the Weston 7 Secondary Plan Landowners Group (the **"W7LOG"**). The W7LOG formed in January, 2024 to coordinate input on the draft Weston 7 Secondary Plan (**"W7SP"** or **"Secondary Plan"**) process for the Weston 7 Secondary Plan Area (**"Weston 7"** or **"W7"**). Since that time, we have been actively engaged with the City of Vaughan (the **"City"**), participating in regular meetings with staff and providing feedback on previous drafts of the Secondary Plan and related initiatives. In addition to this regular engagement, the W7LOG and registered landowners provided correspondence to the City through the letter dated January 21, 2025, regarding Draft #4 of the W7SP and key W7LOG concerns. A copy of this letter is attached for your review.

The W7LOG represents approximately 58.4% of lands within the Secondary Plan area (see Appendix I: Weston 7 Landowners Group Ownership Map), and includes the following individual landowners:

- 2371933 Ontario Inc.
- Calloway Reit (400 and 7) Inc.,
- Calloway Reit (Westridge) Inc.,
- Canadian Property Holdings (Ontario) Inc.,
- Canadian Tire Properties Inc.,
- Costco Wholesale Canada Ltd.,
- CP REIT Ontario Properties Limited,
- Dev-West Properties Inc.,
- Gallu Construction Inc.,
- Kingsmoor Developments Inc.,
- Marino ON 7 Inc.,
- N.H.D. Developments Limited,
- PEM (Weston) Limited Partnership, and
- PEM (Weston) GP Inc.

This letter is being submitted on behalf of each individual landowner as members of the W7LOG in respect of the staff report related to the W7SP which is being considered at a Statutory Public Hearing on June 4, 2025, as part of the new Vaughan Official Plan 2025 (**"Draft VOP"**).

We appreciate the City's ongoing efforts to include the W7LOG in the process, and we are pleased to provide the following high-level comments on Draft #5 of the W7SP for consideration.

1. Growth Management

The W7LOG continues to have concerns regarding the proposed Growth Threshold of 26,000 people and jobs as outlined in Draft #5 and informed by the W7 Transportation Master Plan (**"W7TMP"**). We recognize and concur that growth must be aligned with infrastructure capacity, however, the Secondary Plan as drafted does not provide sufficient direction to achieve full build out to the planning horizon of 2051 and beyond.

The W7SP identifies the area as a Primary Centre, makes frequent reference to the area having potential for substantial growth and density, and references the "ultimate intensification" of Weston 7 (policy 7.2.1 (b)), however, the details of the full build-out are not well established. The Secondary Plan also refers to the planning horizon of 2051, but despite this, the Growth Threshold only contemplates growth to 2041.

In addition, the W7LOG has concerns with relying on the W7TMP to establish the Growth Threshold in the Secondary Plan. It is our understanding that this analysis did not include an investigation of how broader changes to traffic patterns in Vaughan and surrounding municipalities will impact Weston 7, or explore additional interventions that may increase capacity in the near term. We recognize that this analysis may have been outside the scope of work for the W7TMP, however, it is critical for a comprehensive understanding of growth potential.

To support growth to the planning horizon of 2051 and beyond within Weston 7, we suggest the following policy revisions:

1.1 Refer to the current Growth Threshold of 26,000 people and jobs as the "Initial Growth Threshold" throughout the Secondary Plan, which would identify growth capacity to 2041.

This change would emphasize the preliminary nature of the current threshold as being tied to certain planned transportation infrastructure investments, while recognizing that the Growth Threshold will change over time as increased capacity is unlocked through future infrastructure investments and innovation.

1.2 Introduce flexibility in the targeted mix of people and jobs to 2041, in recognition of the existing non-residential uses in Weston 7.

The proposed mix of 10,000 jobs and 16,000 people to make up the 26,000 Growth Threshold does not account for existing non-residential uses in Weston 7, which currently make up the entirety of the Secondary Plan area. The Growth Threshold to 2041 should be an overall figure and not include a specified ratio of people and jobs, in recognition that continued employment provided by existing non-residential uses will continue to exist in various forms while Weston 7 is intensified over time.

1.3 Introduce an "Interim Growth Threshold" to 2051 based on the W7SP Draft #3 threshold of 54,500 people and jobs, which can be pursued without an amendment to the secondary plan. This would be drafted in conjunction with policies to ensure sufficient infrastructure capacity as a condition of development approval.

We recommend that development up to an identified Interim Growth Threshold of 54,500 people and jobs be permitted without an amendment to the Official Plan, subject to studies that demonstrate, to the satisfaction of the City, that sufficient capacity exists or will exist at the time of development. If the intent of the Growth Threshold is to ensure growth is supported by infrastructure, this can be accomplished through planning tools other than a time consuming and costly OPA process.

These policies would be further supported through tools such as Holding Provisions through zoning approvals, and we appreciate that policy language identifying these tools has already been incorporated into Draft #5 of the Secondary Plan.

1.4 Work with the W7LOG to finalize the ultimate capacity target and incorporate this analysis into the Secondary Plan; conceptually identify this as the full build out target in the Secondary Plan.

As an example, the preamble to Chapter 4 in the Vaughan Metropolitan Centre (**"VMC"**) Secondary Plan identifies projected growth to the planning horizon of 2051, and a projected full buildout figure beyond the planning horizon. The same visioning is appropriate for Weston 7 as a Primary Centre and key area of future development.

As such, we recommend working with the W7LOG to identify potential ultimate capacity for Weston 7, acknowledging that such growth would be contingent on sufficient infrastructure, and a large percentage of this growth would be anticipated beyond the 2051 planning horizon.

Establishing a vision for the full build out of these lands will ensure that Weston 7 is prioritized for investment by all levels of government as a Primary Centre and provide clarity to landowners and the public regarding the City's objectives. This approach is also consistent with the Provincial Planning Statement 2024 and intent of the City's Official Plan as a long-term planning document.

1.5 Refine policies to inform phasing and coordination of infrastructure to achieve the ultimate intensification of Weston 7, supported by the W7LOG.

The W7LOG suggests stronger policy direction with respect to the long-term phasing and coordination of development in Weston 7. Specifically, we recommend strengthening section 8.2.1 to include reference to revisiting infrastructure and capacity studies for W7 at regular intervals to ensure that growth continues to advance. This policy revision should also acknowledge that changes to the Growth Threshold may result from such studies, and this would be permitted without amendment to the W7SP.

We also recommend policies that recognize the role of the W7LOG as a prospective partner in progressing growth in the Secondary Plan Area. This should include policies that permit and recognize infrastructure and capacity studies led by the W7LOG, which would be undertaken in collaboration with the City. These W7LOG-led studies have the potential to introduce innovation and provide an additional lens to the understanding of the growth capacity in W7.

1.6 Ensure policy framework permits incremental development and flexibility for additional analysis and innovation.

The W7TMP resulted in a list of specific infrastructure improvements (Appendix I of Draft #5) that are said to be "required" to meet the Growth Threshold of 26,000 people and jobs (policies 2.2(b) and 7.1.3(b)). We strongly recommend revising this policy language to make it clear that development can occur incrementally as transportation improvements occur, and that not all development will be prohibited or discouraged until all of these investments are entirely complete.

Further, flexibility should be introduced to account for alternative analysis that provides different options to achieve targeted growth, in addition to or instead of those in Appendix I. As discussed above, regularly revisiting capacity studies will be crucial to understanding changes in capacity over time, and the W7SP policies should enable this as an overarching policy direction document.

2. Permitted Height and Density

Previous drafts of the Secondary Plan incorporated policies that supported flexibility in permitted heights (see W7SP Draft #4 policies 4.2.2(b), 4.2.3(b), 4,2,4(b)). While we appreciate the removal of the portion of these policies that referred to the provision of "enhanced contributions" given recent changes to S. 37 of the *Planning Act*, the W7LOG strongly supports the general intent to provide flexibility for maximum heights subject to land use compatibility considerations. As an aside, it is understood that community benefits will also be provided through the new Community Benefits Charge framework.

In addition, Draft #5 of the W7SP provides direction for the calculation of density (Floor Space Index, **"FSI"**) that is concerning to the W7LOG and not aligned with the proposed definitions in the Draft VOP. The Secondary Plan proposes to calculate FSI on the basis of net developable area, which as currently defined would exclude lands to be conveyed for public purposes. This could have the effect of penalizing landowners located in areas where larger land conveyance is required for roads, parks, etc., and would require additional administration and negotiations among landowners to ensure equity.

To ensure clarity, fairness, and efficiency, we recommend the following policy revisions:

2.1 Reintroduce flexibility with respect to heights in all land use designations.

Re-introducing policy language that permits increased heights subject to demonstration of land use compatibility, appropriate transition to adjacent uses, and capacity considerations would support efficiencies in the development process as well as support the City's residential and employment targets. It is also in keeping with the designation of Weston 7 as a Primary Centre, identified as an area in which significant growth will be directed.

2.2 Align definitions with the Draft VOP; calculate FSI on the basis of Gross Developable Area to ensure that density calculations are equitable for all landowners.

Aligning definitions with the Draft VOP as identified in Table 1 below, and clarifying through policy that the FSI shall be calculated based on Gross Developable Area will reduce the amount of coordination required among landowners, will encourage the delivery of public infrastructure including roads and parks, and will contribute to a more streamlined development process.

Table 1: Definitions

Definition	W7SP Draft #5	Draft Vaughan Official Plan (May 2025)
Floor Space Index	Floor Space Index is a measure of density as it relates to built-form. Floor Space Index is the ratio of Gross Floor Area to the Net Developable Area of the site	The quotient obtained by dividing the total Gross Floor Area of all buildings on the lot, by the lot area
Net Developable Area	Net Developable Area is the area of the site excluding any lands to be conveyed for public purposes such as public streets, natural heritage features, road widenings, parks and public schools	All lands available for Development for both private and public uses, including residential and employment uses, private open space and Infrastructure (e.g., local and Regional streets and stormwater management ponds). The Net Developable Area excludes: a) Environmental features and areas identified in policy 3.6.3, unless such areas have been utilized for associated servicing Infrastructure; b) The Regional Greenlands System and approved local municipal natural heritage systems where Development is prohibited; c) Key Natural Heritage Features and Areas and Key Hydrologic Features and any required buffers; d) Major Infrastructure rights-of way (i.e. existing 400-series highways and finalized route alignments for extensions or future 400-series highways, utility lines, and rail lines); and e) Existing Uses (e.g., cemeteries, estate subdivisions).
Gross Developable Area	*Not provided*	All lands available for Development for both private and public uses, including residential, and employment uses, private open space and Infrastructure (e.g., local and Regional streets and stormwater management ponds).

3. Urban Design and Built Form

The W7LOG is committed to working with the City to ensure that the Secondary Plan Area develops with high quality design elements and cohesive character that supports the vision of a vibrant, inclusive, accessible and healthy community. In this respect, we generally support the City's proposed urban design policy framework in Draft #5 of the W7SP. We recognize that additional urban design considerations will be appropriately addressed through the City's City Wide Urban Design Guidelines and comprehensively applied through subsequent planning phases.

We also recognize the importance of balancing residents and jobs in Weston 7 to support complete communities, however, we have concerns with the prescriptive nature of policies for Mixed-Use I and Mixed-Use II development and required non-residential Gross Floor Area (**"GFA"**). We are concerned that the requirement for a minimum of 15% or 20% of GFA to be non-residential uses (for Mixed-Use I and Mixed-Use II respectively) would not be feasible under current market conditions, resulting in intensification being stalled.

We propose the following policy change to balance mixed-use objectives with market factors:

3.1 Introduce flexibility in requirement for non-residential GFA in Mixed-Use I and Mixed-Use II designations.

The requirement for non-residential GFA in Mixed-Use I and II designations (policies (5.2.3(b),5.3.3(b), and 5.3.3(c)) cannot be supported by the market, especially without sufficient new residents to support such uses.

It is also notable that the requirement of 15% or 20% non-residential GFA is significantly higher than other areas of the City that are planned for even greater density. For example, the draft VMC Secondary Plan policies introduce a requirement of 10% of non-residential GFA in the Mixed-Use designation, with permission to reduce this amount subject to conditions (policies 9.2.4 and 9.2.5). The Yonge-Steeles Corridor Secondary Plan requires retail along Yonge St. and Steeles Ave. W. but is otherwise flexible in its requirement for non-residential GFA in its High-Rise Mixed-Use designation (Section 3.4). These areas

also benefit from existing or planned subway service, which Weston 7 does not. As such, it is our recommendation that the requirement for non-residential GFA be reduced significantly, and policy be introduced to permit flexibility in the rate to ensure alignment with the development conditions of the area.

Within the Mixed Use II designation, draft policy 5.3.3(c) does not permit dwelling units at grade and a minimum of 75% of ground floor GFA be occupied by non-residential uses. As noted above, we have concerns that this requirement cannot be supported by the market, and the outcome of this policy may also be contrary to its intent, where ground-related non-residential uses cannot be supported by the population. It is our recommendation that the policy language be revised to remove the specific minimum required non-residential gross floor area and instead prioritize policies that activate street frontages within W7.

3.2 Permit standalone residential buildings in Mixed-Use I and Mixed-Use II designations where they do not front onto an Arterial or Major Collector road.

As identified in draft Schedule 1, the majority of lands within Weston 7 are designated either Mixed-Use I or Mixed-Use II, and within these designations, standalone residential development is prohibited (policies 5.2.3(b) and 5.3.3(b)). Requiring that essentially all development in the W7SP include non-residential GFA is not feasible given current market conditions and would not necessarily lead to a quality pedestrian experience for future residents if non-residential GFA is built but remains unoccupied.

To balance the vision for a mixed-use complete community with market factors, we recommend permitting standalone residential buildings in Mixed-Use I and II designations where the buildings do not front Arterial or Major Collector roads. This will ensure a mix of uses are preserved on major roads, while also ensuring that residential growth is supported, which will in turn create a critical mass of residents to sustain non-residential uses.

4. Additional Comments

The LOG has the following additional comments for the City's consideration as it develops the W7 Secondary Plan:

4.1 Ensure Priority Consideration Overlay policy framework prioritizes planning review and approvals for applicable applications, but allocates capacity on a "first come, first served" basis based on development timing.

The W7LOG appreciates the City's recognition of existing planning applications in the W7SP Area through the Priority Consideration Overlay, and we support the policy framework that supports prioritizing review of these applications for approval.

Regarding draft policy 5.6(b), we suggest adding language to clarify that, despite Priority Consideration Overlay status for planning approvals, capacity allocation will ultimately be dependent on timing of construction, on a "first come, first served" basis and where it is demonstrated that sufficient infrastructure is able to support the development being proposed. For example, an applicant may not develop for many years after obtaining planning approvals, and therefore capacity allocation should not be earmarked for such development.

We further recommend that this approach to capacity allocation based on development readiness also apply to future planning applications that are not within the Priority Consideration Overlay. In other words, if an application outside of the Priority Consideration Overlay is approved and prepared to begin construction, they should receive capacity allocation ahead of an application within the Priority Consideration Overlay that is not yet ready to start construction.

4.2 Introduce greater flexibility for local road mid-block right-of-way requirements.

Policy 7.1.3(d) introduces a requirement of 23 metres for local roads. This is above the standard requirement, in high-density areas – for example, the draft VMC secondary plan policy permits local roads with a right-of-way of 20-22m. As such, we recommend lowering the standard for local roads to be 20 metres, which representsa more appropriate local road right of way to support growth within the W7SP.

4.3 Work with the W7LOG to refine parkland framework to ensure suitability in a high-density urban community.

We recognize that changes to parks policies in Draft #5 include the removal of Pocket Parks and Promenades, and introduction of Urban Parks and Public Squares. We are seeking clarification on the basis for this change. The W7LOG supported the previous policy direction that smaller parks may be considered eligible parkland contributions, as this was in keeping with the urban, high-density vision for Weston 7. We would appreciate the opportunity to discuss this change with staff and provide further comment on how we can support parkland provision for the benefit of future residents.

We appreciate the work of staff to prepare Draft #5 of the W7SP, and we look forward to continuing to participate in the process of building Weston 7 into a well-designed, engaging, mixed-use complete community. If you have any questions about the comments above, please reach out to the undersigned.

Yours truly,
KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan MCIP, RPP
Partner



Madison Van West MES, MCIP, RPP
Intermediate Planner II

Appendix I: Weston 7 Landowners Group Ownership Map



Weston 7 Landowners Group Ownership Map

No.	Ownership Name	Common Name	Gross Area (ac)
1	CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	19.30
2	CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	10.84
3	N.H.D. DEVELOPMENTS LIMITED	Sorbara	4.14
4	HOME DEPOT HOLDINGS INC.	Home Depot	10.02
5	CALLOWAY REIT (400 AND 7) INC.	Smart Centres	9.65
6	167 CHRISLEA ROAD HOLDINGS INC.		3.44
7	CP REIT ONTARIO PROPERTIES LIMITED	Choice	8.89
8	CALLOWAY REIT (WESTRIDGE) INC.; CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.	Smart Centres/Choice	6.76
9	CANADIAN TIRE PROPERTIES INC.	Canadian Tire	8.22
10	PEM (WESTON) LIMITED PARTNERSHIP; PEM (WESTON) GP INC.	Pemberton	3.65
11	MAC'S CONVENIENCE STORES INC.	Mac's	0.75
12	1857307 ONTARIO INC.	Liberty	4.80
13	CALLOWAY REIT (400 AND 7) INC.	Smart Centres	5.78
14	CALLOWAY REIT (400 AND 7) INC.	Smart Centres	4.68
15	KINGSMOOR DEVELOPMENTS INC.	Trinity Point	2.82
16	GALLU CONSTRUCTION INC.	ARG	3.96
17	Condominium		2.71
18	MARINO ON 7 INC.	Marino	1.91
19	Condominium		1.97
20	DEV-WEST PROPERTIES INC.	Morguard	10.05
21	SUNCOR ENERGY INC.	Suncor	1.58
22	Condominium		2.68
23	RIOTRIN PROPERTIES (VAUGHAN 3) INC.	RioCan	5.57
24	1493130 ONTARIO LIMITED	RioCan	20.14
25	2371933 ONTARIO INC.	Sky Property Group	2.47
26	RIOTRIN PROPERTIES (VAUGHAN) INC.	RioCan	6.09
27	RIOTRIN PROPERTIES (VAUGHAN2) INC.	RioCan	17.29
28	COSTCO WHOLESALE CANADA LTD.	Costco	13.08
29	1493130 ONTARIO LIMITED	RioCan	10.58

Total Participating Owners	116.20
Total Non-Participating Owners	82.80
TOTAL *	**199.00**

* Does not include Liberty (Parcel No.12)

Legend

- Weston & 7 Secondary Plan Boundary
- (#) Parcel Number
- Exempt Owner
- Participating Owner
- Non-Participating Owner
- N

Job No.	
File No.	

Description: Weston & 7 Secondary Plan Ownership Map

Municipality: Vaughan, Ontario
Region of York

DELTA URBAN
8800 Dufferin St, Suite 104
Vaughan, Ontario L4K 0C5

Source: Geowarehouse

Date: March 13, 2025