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KLM File: P-2948

January 8, 2026

Ministry of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay St
Toronto, Ontario
M7A 2J3

Attention: Hon. Rob Flack, Minister of Municipal Affairs and Housing

Re: ERO 025-1420 – Approval of Vaughan Official Plan 2025
1539253 Ontario Inc.
10951 Kipling Avenue, Part of Lots 27 and 28, Concession 7
City of Vaughan, ON
Related Vaughan City Files: OP.09.003, Z.09.026

Dear Minister Flack,

KLM Planning Partners Inc. is the land use planning consultant for 1539253 Ontario Inc., the owner of the lands known municipally as 10951 Kipling Avenue (the "Subject Lands"), in the City of Vaughan ("City"). Through your consideration of the Vaughan Official Plan 2025 ("VOP 2025") for approval, we respectfully request a modification that would enable development of the Subject Lands for the Kipling Recreational Centre, which would require a redesignation of the Subject Lands as "Private Open Space" on proposed Schedule 13 and "Rural Lands" on proposed Schedule 1D.

Planning for the Kipling Recreational Centre began more than 15 years ago, which envisions a mix of parks, playgrounds, racquet courts, lawn bowling greens, skating and curling rinks, athletic fields, picnic areas, swimming pools, day camps, indoor facilities, cross-county skiing, walking trails and similar uses on the Subject Lands, together with necessary and accessory buildings and structures.

Applications for Official Plan Amendment and Zoning By-law Amendment related to the Recreational Centre have been in process since 2009. While at one time recreational uses were permitted on the Subject Lands, the planning policy framework has undergone numerous changes at the City, Regional and Provincial levels since that time, which has led to significant uncertainty for the future of this development.

We provided detailed correspondence to the City in June, 2025 as part of the VOP 2025 process. This previous correspondence has been attached to this letter and provides thorough background on the Subject Lands as well as the planning rationale supporting this request (note: certain VOP 2025 policy numbering has changed since the timing of our previous letter).

As part of your review of VOP 2025, we sincerely appreciate your consideration of the requested redesignation of the Subject Lands, which would enable the development of this exciting community asset in the City. We provided correspondence directly to Ministry staff on this matter prior to the posting on the Environmental Registry, however, this previous letter may not have been filed for the

public record. As such, please accept this version in its place. If you have any questions, please reach out to the undersigned.

Yours truly,
KLM PLANNING PARTNERS INC.

Ryan Mino-Leahan BURPl, MCIP, RPP
Partner

Madison Van West MES, MCIP, RPP
Senior Planner

Cc:
1539253 Ontario Inc.

Attachment 1: Correspondence from KLM Planning Partners Inc. to Hon. Mayor Del Duca and Members of City of Vaughan Council dated June 3, 2025 re: Committee of the Whole (Public Hearing), Item #4.10, Draft #5 City of Vaughan Official Plan 2025

ATTACHMENT 1

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File: P-2948

June 3, 2025

The City of Vaughan
2141 Major Mackenzie Dr.
Vaughan, Ontario
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via Email: clerks@vaughan.ca & oprmanager@vaughan.ca

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

Re: Committee of the Whole (Public Hearing), Item # 4.10
Draft #5 City of Vaughan Official Plan 2025
1539253 Ontario Inc.
10951 Kipling Avenue
Related Vaughan City Files: OP.09.003, Z.09.026
Part of Lots 27 and 28, Concession 7
City of Vaughan, ON

KLM Planning Partners Inc. is the land use planning consultant for 1539253 Ontario Inc., the owner (the "**Owner**") of the lands known municipally as 10951 Kipling Avenue (the "**Subject Lands**"), in the City of Vaughan ("**City**" or "**Vaughan**").

The purpose of this letter is to request that the City's proposed draft Official Plan 2025 (the "**Draft VOP 2025**") be revised to designate the Subject Lands as "Private Open Space" on Draft Schedule 13 and "Rural Lands" on Draft Schedule 1D. Doing so would facilitate the establishment of a desirable suite of alternative recreational opportunities on the Subject Lands that has been under consideration since 2009. We also request revisions to the transition policies in the Draft VOP 2025.

The Subject Lands are located on the east side of Kipling Avenue, north of Teston Road, being in the northwestern quadrant of the City. The Subject Lands have approximately 807 metres frontage on the east side of Kipling Avenue and an approximate depth of 982 metres. The Subject Lands are 79.69 hectares (196.9 acres) in area. Based on a natural features staking exercise that took place with TRCA in September 2019, the developable area is 49.45 hectares (122.2 acres). Applications for Official Plan Amendment and Zoning By-law Amendment (the "**Applications**", City files OP.09.003, Z.09.026) have been in

process since 2009 to facilitate a privately-owned and publicly accessible outdoor and indoor recreational uses.

1.0 Background

1.1 The Applications

The Applications were submitted to the City on September 11, 2009 to facilitate a privately-owned and publicly-accessible outdoor and indoor recreational centre known as the "Kipling Recreational Centre". A revised submission with updated reports was made on January 19, 2021. A constantly shifting land use planning legislative and policy has greatly complicated the application process.

The Owners' vision for the Kipling Recreation Centra is for it to provide a mix of parks, playgrounds, racquet courts, lawn bowling greens, skating and curling rinks, athletic fields, picnic areas, swimming pools, day camps, indoor facilities, cross-county skiing, walking trails and similar uses, together with necessary and accessory buildings and structures. The exact components would be determined through further consultation.

1.2 Land Use Designations

The Subject Lands are located within the Protected Countryside of the Greenbelt Plan. The policies for the Protected Countryside permit a range of agricultural, infrastructure, natural resource, as well as recreational uses. The Greenbelt Plan outlines the applicable policy framework for Natural Heritage and Agricultural Systems, each consisting of further subclassifications. Within the Agricultural System the "Rural Lands" and the "Prime Agricultural" designation can be found. Municipalities are responsible for identifying "Rural Lands" and "Prime Agricultural" areas within their Official Plans. The Rural Lands designation allows for recreational, tourism, and institutional uses, a crucial component of any community, whereas the Prime Agricultural designation does not.

At the time of the Applications, the Subject Lands were designated "Rural Policy Area" under the York Region Official Plan 1994 ("**YROP 1994**") which permit recreational use of the Subject Lands. The 2010 YROP was subject to appeal by the Owners and the land use designations for the Subject Lands have not been determined. On November 2022, the Ministry of Municipal Affairs and Housing (the "**MMAH**") approved the 2022 York Region Official Plan ("**YROP 2022**"), which designated the Subject Lands "Agricultural Area" and introduced more stringent restrictions on permitted land uses for the Subject Lands which preclude recreational use. Due to changes in legislation, the Owners were not able to challenge this Decision and its underlying mapping despite the long-standing proposal for recreational use of the Subject Lands.

The passing of *Bill 23, More Homes Built Faster Act, 2022* ("**Bill 23**") had the effect of making the YROP 2022 an Official Plan of the City of Vaughan, with York Region becoming an

Upper Tier Municipality without Planning Responsibilities. We understand that through the Draft VOP 2025 process, the City will be repealing the YROP 2022.

The Subject Lands were designated "Rural Use Area" by Vaughan Official Plan Amendment 600 ("**OPA 600**") which explicitly permitted recreational uses, subject to detailed planning. OPA 600 was in place at the time the Applications were made. Subsequently, the Vaughan Official Plan 2010 (the "**VOP 2010**") was approved, but appealed by the Owners. There has been no land use determination in the VOP 2010 appeals.

2.0 Key Considerations

Enabling recreational uses on the Subject Lands through the "Private Open Space" and "Rural Lands" designation is supported by: the long-standing intent for the Subject Lands demonstrated by the Applications, site conditions that limit agricultural production, the existing and planned surrounding land, and the opportunity to support City density targets and complete community objectives.

2.1 History of Subject Lands and Description of Proposed Development

- In the context of the Subject Lands, the Kipling Recreational Centre is encouraged by the PPS 2024 and is permitted within the broader Greenbelt Plan Protected Countryside designation.

- The Subject Lands are designated "Rural Area" under the YROP 1994 and "Rural Use Area" under OPA 600. These designations would permit the Kipling Recreational Centre, subject to detailed implementation.

- The Subject Lands are in a location that is easily accessible to surrounding residential lands. As such, the Subject Lands provide a convenient additional opportunity for recreation uses within the City.

- It is also notable that the uses proposed by the Applications are low intensity, will maintain highly permeable surfaces, and would be designed to protect and enhance natural heritage features. The Kipling Recreation Centre would be in keeping with the policy framework for development within the Greenbelt Plan Protected Countryside – Natural Heritage System.

2.2 Limited Viability as Agricultural Lands

- Despite Provincial agricultural mapping, the viability of the Subject Lands being utilized to their full extent for agricultural uses, including for livestock and poultry facilities, is greatly limited due to the presence of sensitive uses to the immediate west and the requirement to meet Minimum Distance Separation policies in Provincial Policy.

- The existence of natural heritage features also limits the ability to maximize agricultural operations. Recreational uses would provide an appropriate transitional use between urban uses and agricultural uses.

2.3 Supporting Density Targets and Leveraging Existing Servicing

- The Kipling Recreation Centre would appropriately balance the objectives of Provincial policy and municipal policy by permitting larger format recreational uses within the Greenbelt Plan, which are permitted on Rural Lands in the Protected Countryside, while allowing lands within the urban boundary to be more appropriately developed for more intensive urban uses including residential and employment uses. This will directly support the Provincial Government's objective of contributing to the much needed housing supply.

- Environmental and natural self-sustaining areas (in accordance with the Greenbelt Plan) will been protected. Based on the Draft VOP 2025, new community areas shall be designed to meet or exceed a minimum density target of 65 residents and jobs/hectare. Locating a recreational centre of the proposed scale within the urban boundary could potentially result in the loss of land that could support housing for 2,240 future residents.

- The PPS 2024 requires the efficient use of existing infrastructure. With respect to servicing the Subject Lands, the approved Master Environmental Servicing Plan for the adjacent Block 55 community made provision for services adequate to accommodate the Kipling Recreational Centre.

2.4 Supporting Complete Communities

- The Kipling Recreational Centre would contribute to a high quality of life for residents of the City, not only in providing expanded opportunities to recreate but also by creating opportunities for employment and economic growth.

- The Kipling Recreational Centre will provide recreational uses in close proximity to residential communities while creating the potential to free up an equivalent amount of land in the urban area for uses other than large format recreational uses. As noted, this will protect opportunities to provide more housing in the urban areas of Vaughan.

- The City's Active Together Master Plan ("**ATMP**"), which was updated in 2018, contemplates the provision of parks, recreation, and library facilities for the period from 2018 - 2023, and with a view to 2031 when the population is projected to increase from 324,100 in 2018 to 424,500. The Kipling Recreational Centre would contribute to the realization of the ATMP vision, supplementing available and planned public facilities to complement the spread and availability of a diversity of recreational options for residents.

- Considering the ATMP intention to provide parkland, including facilities such as those proposed, at a rate of 2.0 ha per 1,000 residents, the Kipling Recreational Centre has the potential to serve approximately 17,230 residents of the City. In a more specific assessment of the ATMP recommendations, Table 1 within the Executive Summary, recommends that twelve (12) additional soccer fields, three (3) cricket pitches, two (2) multi-use artificial fields (football, rugby, lacrosse, etc.), and twenty (20) tennis courts be developed within the City. If approved as proposed, the Proposed Development could provide parks, playgrounds, racquet courts, lawn bowling greens, skating and curling rinks, athletic fields, picnic areas, swimming pools, day camps, indoor facility, snow skiing, walking trails and all similar uses, together with necessary and accessory buildings and structures.

- As a comparative exercise, the Kipling Recreational Centre would provide parkland for 20,676 housing units based on a net developable area of 34.46 ha at the current parkland dedication rate of 1 hectare of parkland per 600 units.

The Kipling Recreational Centre supports the current direction of the City to provide more recreational opportunities, delivering facilities in alignment with the ATMP, and has the potential to free up significant urban lands for residential, employment, commercial, and institutional uses which are not permitted within the Greenbelt.

3.0 Draft Vaughan Official Plan 2025

Below we provide detailed comments and requested revisions for the Draft VOP 2025. We would be pleased to meet, as needed, to further discuss any aspect of our comments.

3.1 Transition Provisions

The Draft VOP 2025 has a view to transition of ongoing applications within Section 1.4.2.4 which proposes to continue processing applications which were deemed complete after September 7, 2010 under the Official Plan in effect at the time they were deemed complete.

Problematically, the Applications were deemed complete prior to this transition date. However, the principle of considering policy in force at the time an application is made should continue to apply, as is the common practice in land use planning. Then, as now, the Kipling Recreational Centre represents a logical land use.

To account for this, and to support other similar applications that may exist, we propose a modification to Section 1.4.2.4 to refer simply y to “applications deemed complete prior to adoption of VOP 2025.”

3.2 Recommended Policy Directions

In the Draft VOP 2025, the Subject Lands are proposed to be designated:

- "Prime Agricultural Lands" on Schedule 1D Agricultural System,
- "Greenbelt Plan Area, Natural Heritage Network" and "Core Features" on Schedule 2 Natural Heritage Network,
- "Greenbelt Protected Countryside" on Schedule 4; and,
- "Natural Areas" and "Prime Agricultural Areas" on Schedule 13 Land Use.

Based on the information provided in this letter, it is requested that draft schedules are revised to reflect the following designations:

- "Rural Lands" on Schedule 1D Agricultural System; and,
- "Private Open Space" on Schedule 13 Land Use.

These changes would support the continued processing of the Applications to establish a recreation centre which aligns with Provincial policy objectives, including as expressed through the Greenbelt Plan. As a low intensity land use with expansive field areas the Kipling Recreational Centre is compatible land use in the Greenbelt Belt Protected Countryside.

While a change is not requested to Schedule 9C Cycling Facilities and Trails, this schedule indicates that the planned "Vaughan Super Trail" multi-use recreational path is intended to traverse just above the north limit of the Subject Lands. The trail is described as an important active linkage connecting the "North Kleinberg-Nashville Secondary Plan area" to the west and the "Block 41 Secondary Plan" area to the east and beyond. Continued processing of the Applications could potentially contribute to advancement of the City's objectives to realize the connection, and would provide a recreational destination along this route encouraging non-vehicular travel.

With respect to natural heritage and agricultural areas, Section 1.7.5 broadly proposes to protect environmentally sensitive lands with the application of appropriate buffers, to protect agricultural and diversified uses, and to support improved access to natural areas and trails recognizing health benefits for residents. The requested modifications to the Draft VOP 2025 would support these objectives by protecting delineated natural heritage resources and their buffers within the Subject Lands, by naturalizing additional lands in accordance with the requirements of the Greenbelt Plan, by establishing new trails throughout the site connecting to existing and proposed trail infrastructure, and by introducing a range of recreational facility encouraging resident health and well-being.

The proposed policies of section 2.6.1 provide guidance with respect to lands being designated "Prime Agricultural Lands" and "Rural Lands". By applying a "Rural Lands" designation to the Subject Lands, a broader range of non-residential uses, such as the

Proposed Development, would be permitted in alignment with the PPS 2024 and the Greenbelt Plan. This modification would recognize that the Subject Lands are situated among urban areas, and other non-agricultural uses that make up the context which is not characteristic of a prime agricultural area where concentrations of farms with ongoing agriculture operations would otherwise predominate.

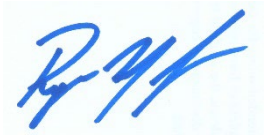
The draft "Private Open Space" designation policies 3.2.5.2 and 3.2.5.3 are directed towards lands that currently do or could support the broader Open Space Network. Lands with this designation are not intended for Development or Redevelopment. This designation would facilitate the proposed recreation use, introducing a combination of passive and active recreation uses within the Greenbelt. Internal and external trail connectivity, introduction of recreational uses identified within the City's ATMP, and naturalization of a component of the site will result in a use which will compliment, expand, and enhance the broader Open Space Network.

4.0 Summary

Applications and related appeals have been in process for an extended period dating back to 2009. The Subject Lands are encumbered substantially by environmental features and are located broadly between urban uses and immediately among non-agricultural and limited agricultural uses. The requested modifications to the Draft VOP 2025 would result in a use which supports the surrounding community with facilities identified in the ATMP, potentially freeing up urban lands for uses which are not permitted within the Greenbelt. The location for the proposed recreational use is strategic where existing servicing and planned trail infrastructure is concerned and would represent an expansion and enhancement to the Open Space Network while protecting environmental features and naturalizing a large segment of the Subject Lands.

Thank you for the opportunity to comment. We are more than happy to discuss the specific details associated with the information enclosed as required. We trust the foregoing is in order. Please notify the undersigned of any further correspondence, public meetings or decisions in relation to this matter.

Yours truly,
KLM PLANNING PARTNERS INC.





Ryan Mino-Leahan MCIP, RPP

Partner

Madison Van West MES, MCIP, RPP

Intermediate Planner II

cc: 1539253 Ontario Inc.