Davies Howe
LAND DEVELOPMENT ADVOCACY & LITIGATION

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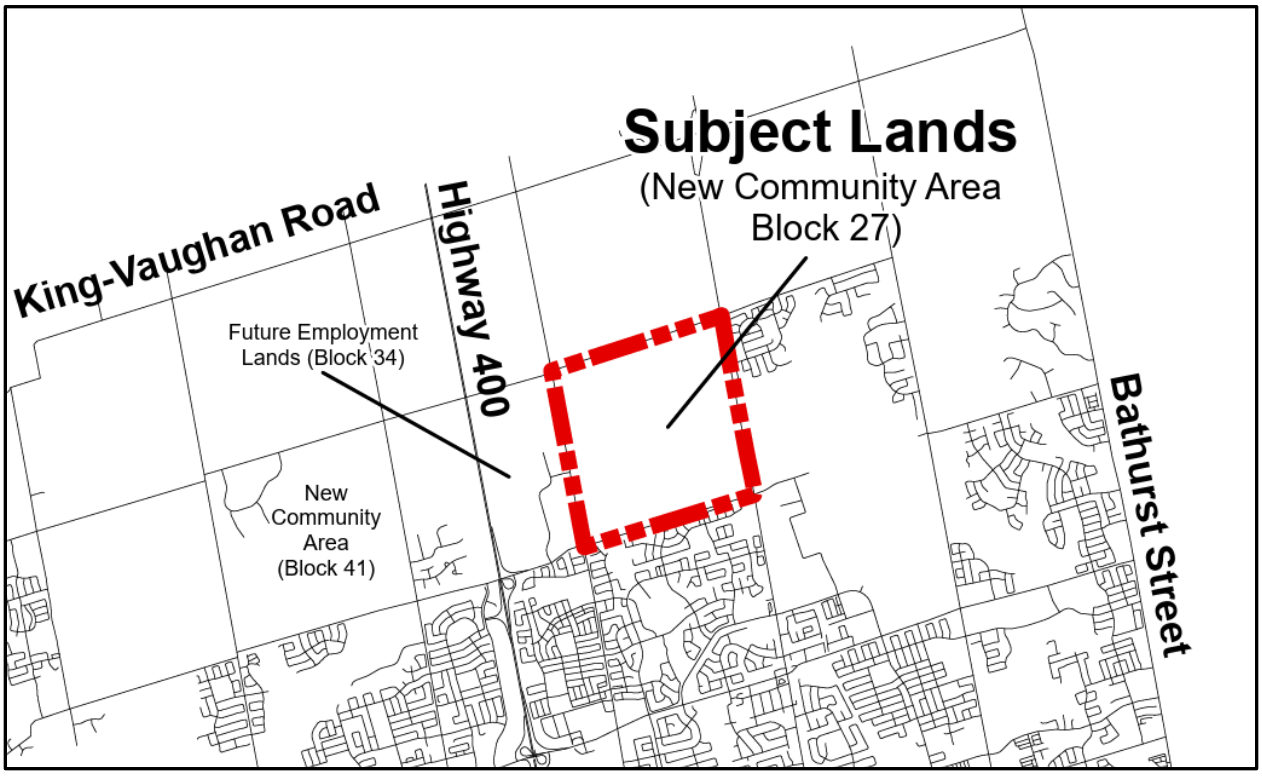
By E-Mail Only to *matthew.meighoo@ontario.ca*

Matthew Meighoo
Municipal Services Office – Central Ontario
777 Bay Street, 16th Floor
Toronto, ON M7A 2J3

Dear Minister Flack:

Re: ERO Posting No. 025-1420
New Vaughan Official Plan
Comments of Block 27 Landowners' Group

We are counsel to the Block 27 Landowners' Group (the "**Group**") with respect to a 400-hectare tract of land bounded by Keele Street, Teston Road, Jane Street, and Kirby Road (the "**Subject Lands**" or "**Block 27**") as illustrated below. The members of the Group are listed in Appendix One.



The purpose of this letter is to provide comments on the adopted version of the 2025 Vaughan Official Plan ("**2025 VOP**") as it relates to transitional matters and parkland dedication. A comprehensive list of issues and requested revisions can be found in Appendix Two.

For context, land use planning for Block 27 began in 2015. The Block 27 Secondary Plan was adopted by City Council in 2018 and approved by York Region in 2019. The Block Plan was conditionally approved by the City in 2025. The Group has worked diligently to satisfy the conditions and while some work remains ongoing, site-specific applications to facilitate development are now coming forward, with the first application targeted for approval in February 2026.

The scale of planned development for Block 27 is immense. As it stands, a minimum of 7,474 residential units is estimated, being comprised of:

- 1,080 single detached homes;
- 216 semi-detached homes;
- 2,725 townhouses; and,
- 3,453 apartment dwellings.

The residential component is accompanied by space to accommodate an estimated 1,530 jobs.

Given the land use planning work completed to date and the scale and complexity involved, the objective of the Group is to avoid needless delay arising from policy complications introduced by the 2025 VOP.

The best way to ensure there will be no delay from policy complications is to rely on the planning work that has already been done and exempt Block 27 from the 2025 VOP in its entirety. While it is clear that Block 27 is exempt from most of the 2025 VOP, the same cannot be said of its parkland dedication policies. The avoidance of complication is why comments focus so heavily on ensuring Block 27 is fully transitioned under the combined operation of policies 1.3.2.1, 1.3.2.4(d), 1.3.2.5, and 1.3.2.6.

While the risks to the Group are great, the risks to the City, if the Group's policy requests were to be implemented, are virtually non-existent. Block 27 would still be governed by the legal and policy framework regarding parkland set out in:

- the *Planning Act*;
- the City's thorough Parkland Dedication By-law;

- policies 2.1(ix), 3.1.5(a), 3.8, 3.15.2(c), 3.15.2(e), 3.15.3(c), 5.0, 5.2, 5.3, 5.4, 9.6.1, 9.6.2, and 9.6.6 of the Block 27 Secondary Plan;

- the expectations set by the conditionally approved Block Plan; and,

- A pending Master Parkland Agreement which the Group believes will be finalized shortly.

It is only if Block 27 is not clearly fully transitioned as requested through the modifications to 1.3.2.1, 1.3.2.4(d), 1.3.2.5, and 1.3.2.6 that the comments on the remainder of the Parkland Dedication policies in the 2025 VOP are pertinent.

In general, the comments on the remainder of the policies also seek to minimize delay; but they also seek to manage unfair and potentially illegal costs associated with the provision of parkland that would be incurred, ultimately, by future homeowners and businesses.

While the Group's strong preference is to implement the requested modifications through the Minister's authority pursuant to section 17(34) of the *Planning Act*, in the alternative the Group asks that the requests be referred to the Ontario Land Tribunal in accordance with s. 17(55) or 17(61) of the *Planning Act*.

Should there be any questions about this submission, please do not hesitate to contact me.

Yours truly,
DAVIES HOWE LLP



Alex Lusty (he/him)

Appendix One

Block 27 Landowners Group Inc.	
Entities	**Common Name**
BW Teston Inc.	ARG Group Inc.
Ferrara Glade Investment Inc. Heathfield Construction Ltd.	Armland Group
West Jane Developments Inc.	DG Group
Prestige Rentals Inc.	Di Poce Management Ltd.
Gold Park (Maple Inc.) Rosehollow Estates Inc.	Gold Park
Keltree Developments Inc.	Keltree
Lormel Developments Ltd.	Lormel Homes
Gusgo Holdings Ltd.	Nideva Properties Inc.
Alderlane Estates Inc.	Royal Pine Homes
2640131 Ontario Inc.	Southbrook Homes
Teston Woods Development Corp.	State Build Group
Palmira Battistella	Private Owners
Di Biase, Adrian; Di Biase, Kristina; Di Biase, Stephen; La Posta, Erika; La Posta, Andrea	Private Owners

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Appendix Two

Policy as Adopted	Issue	Requested Modification	Basis for Request
Section 1.3.2.1 That on approval of this Plan, pursuant to By-law 241-2025, VOP 2010 and the YROP 2022 are repealed, save and except (and until such time as those portions are repealed and replaced pursuant to policies 1.3.2.2 and 1.3.2.3): … b. Volume 1 of VOP 2010, save and except policy 7.3.3 which is repealed on approval of this Plan, which is required for: i. approvals of applications or appeals in process pursuant to policies 1.3.2.4 (a), (b), and (d), and 1.3.2.5; and… Subsection 1.3.2.4(d) That development applications:… for lands that are subject to VOP 2010 pursuant to policy 1.3.2.1 shall be reviewed and assessed under the appropriate VOP 2010 and YROP 2022 policies and schedules, save and except in respect of parkland dedication in which case this Plan shall apply.	Section 1.3.2.1 results in the land within Block 27 being, for the most part, excluded from the 2025 VOP until such time as the Block 27 Secondary Plan can be incorporated into it *via* a separate amendment process. Despite the transitioned nature of Block 27 these policies would purportedly require applications in Block 27 to conform with the parkland dedication policies of the 2025 VOP as a result of 1.3.2.4(d). These policies may be interpreted as running counter to the policy framework that has been established for Block 27 through a comprehensive process that has been in progress for nearly a decade. The accompanying uncertainty introduces unnecessary policy risk within Block 27 which could both delay and add cost to build-out.	Section 1.3.2.1 That on approval of this Plan, pursuant to By-law 241-2025, VOP 2010 and the YROP 2022 are repealed, save and except (and until such time as those portions are repealed and replaced pursuant to policies 1.3.2.2 and 1.3.2.3): … b. Volume 1 of VOP 2010, save and except policy 7.3.3 which is repealed on approval of this Plan, which is required for: i. approvals of applications or appeals in process pursuant to policies 1.3.2.4 (a), (b), and (d), and 1.3.2.5; and… Subsection 1.3.2.4(d) That development applications: for lands that are subject to VOP 2010 pursuant to policy 1.3.2.1 shall be reviewed and assessed under the appropriate VOP 2010 and YROP 2022 policies and schedules, save and except in respect of parkland dedication in which case this Plan shall apply **to those same lands, but not to Block 27.**	The requested modification does not prejudice the City. The City would continue to benefit from the parkland dedication provisions of the *Planning Act* and its Parkland Dedication By-law. In addition, the Block 27 Secondary Plan contains its own parkland policies which are found in sections 2.1(ix), 3.1.5(a), 3.8, 3.15.2(c), 3.15.2(e), 3.15.3(c), 5.0, 5.2, 5.3, 5.4, 9.6.1, 9.6.2, and importantly 9.6.6 which sets out the requirement for a Master Parkland Agreement to facilitate dedications. To compliment the policies, mapping identifying parkland locations within Block 27 is provided on schedules B and E of the Block 27 Secondary Plan. The Block Plan then implements the Secondary Plan by delineating the location and size of five neighbourhood parks and identifies the conceptual locations of two public squares and an urban park to be provided as individual development applications advance.

			The requested modification is targeted to Block 27 only and would allow planning for Block 27 to continue uninterrupted by the VOP 2025 under circumstances where adequate policy and land use planning provisions are in place to ensure adequate parkland provision.
1.3.2.5 Applications under the *Planning Act* or the *Condominium Act*, or Block Plan applications, required for development applications that was reviewed and assessed pursuant to policy 1.3.2.4 (a), (b) or (d) shall also be reviewed and assessed under the appropriate Official Plan policies and schedules prior to this Plan save and except in respect of parkland dedication in which case this Plan shall apply.	Again, due to the combined operation of policy 1.3.2.4(d) above and this policy, development applications for Block 27 may be subject to parkland dedication policies which were not used to inform the planning of the Block.	1.3.2.5 Applications under the *Planning Act* or the *Condominium Act*, or Block Plan applications, required for development applications that was reviewed and assessed pursuant to policy 1.3.2.4 (a), (b) or (d) shall also be reviewed and assessed under the appropriate Official Plan policies and schedules prior to this Plan save and except in respect of parkland dedication in which case this Plan shall apply**, but such parkland dedication policies shall not apply to Block 27**.	The basis for this request is the same as above.
1.3.2.6 Despite policies 1.3.2.4 (a), (b), (d), and 1.3.2.5, while the review and assessment of the merits of such applications or appeals shall not be subject to this Plan save and except in respect of parkland dedication in which case this Plan shall apply, where such applications or appeals are to be approved, for administrative convenience, where practicable the form of such approvals may be in the form of an amendment to this Plan. Where that is not practicable, then the approval will remain subject to the appropriate prior Official Plan policies and schedules, until the City	The issue here is similar to the issues with policies 1.3.2.1, 1.3.2.4, 1.3.2.5 as set out above.	1.3.2.6 Despite policies 1.3.2.4 (a), (b), (d), and 1.3.2.5, while the review and assessment of the merits of such applications or appeals shall not be subject to this Plan save and except in respect of parkland dedication in which case this Plan shall apply, **unless within Block 27**, where such applications or appeals are to be approved, for administrative convenience, where practicable the form of such approvals may be in the form of an amendment to this Plan. Where that is not practicable, then the approval will remain subject to the appropriate prior Official Plan policies and	The basis for this request is the same as above.

has amended this Plan to incorporate or update that approval.		schedules, until the City has amended this Plan to incorporate or update that approval.	
4.4.6.1 To consider the parkland objectives and targets established in the Greenspace Strategic Plan, as amended from time to time, in the application of parkland dedication requirements for the Development process. Communities that do not meet the active parkland targets are considered priorities for additional parkland resources.	Should Block 27 not be considered fully transitioned, then the issue with this policy is that the Greenspace Strategic Plan is not a part of the 2025 VOP and therefore does not have the weight of policy. However, the policy does not make that distinction clear.	4.4.6.1 To ~~consider~~ **review for informational purposes** the parkland objectives and targets established in the Greenspace Strategic Plan, as amended from time to time, in the ~~application of parkland dedication requirements for the~~ Development process. Communities that do not meet the active parkland targets are considered priorities for additional parkland resources.	The requested modifications clarify that the Greenspace Strategic Plan is not a policy document with a statutory requirement for either "have regard". "consistency", or "conformity" that must be met while still confirming its role as an informative document. The Group only requests the modifications if the requested changes to the transition policies are not made.
4.4.6.2 As per the *Planning Act*, to require the provision of new parkland for all residential Development or Redevelopment as: a. a conveyance, at the rate of 5% of the Developable Area or one hectare of parkland per 600 dwelling units, or a combination of, whichever is the greatest; or b. payment-in-lieu of parkland dedication, at the rate of 5% of the value of the Developable Area or one hectare of parkland per 1,000 dwelling units, or a combination of, whichever is the greatest. Definitions The Developable Area includes all lands available for Development for both private and public uses, including residential and	Should Block 27 not be considered fully transitioned, then the definition of "Developable Area" upon which this policy relies is an issue. The definition of "Developable Area" includes lands as contributing to parkland generation that do not have the potential to generate parkland users as they are not occupied, such as open space, infrastructure, roads and stormwater management ponds. Conversely, the definition fails to exclude lands that do not contribute to demand for parkland, namely: all roads, stormwater management features, infrastructure, open space, parkland, and archaeological sites preserved in-situ.	4.4.6.2 As per the *Planning Act*, to require the provision of new parkland for all residential Development or Redevelopment as: a. a conveyance, at the rate of 5% of the Developable Area or one hectare of parkland per 600 dwelling units, or a combination of, whichever is the greatest; or b. payment-in-lieu of parkland dedication, at the rate of 5% of the value of the Developable Area or one hectare of parkland per 1,000 dwelling units, or a combination of, whichever is the greatest. Definitions The Developable Area includes all lands ~~available for Development for both private and public uses, including residential and~~	The requested modifications would ensure that land assessed for parkland contribution generates a demand for parkland. If the modifications are not made, the risk is that parkland will be acquired for lands that do not contribute to parkland demand, resulting in additional costs on development that were not intended to be imposed under the *Planning Act.* The Group only requests these modifications if earlier changes to the transition policies are not made.

employment uses, open space and Infrastructure (e.g. local and Regional streets and stormwater management ponds). The Developable Area excludes: a) Environmental features and areas where Development is prohibited; b) The Regional Greenlands System and approved local municipal Natural Heritage Systems where Development is prohibited; c) Key natural heritage features and Key Hydrologic Features; 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)….		**~~employment uses, open space and Infrastructure (e.g. local and Regional streets and stormwater management ponds)~~ put to residential or non-residential use that accommodate people and generate a demand for parkland.** **Without limiting the generality of the foregoing**, the Developable Area excludes: a) Environmental features and areas where Development is prohibited; b) The Regional Greenlands System and approved local municipal Natural Heritage Systems where Development is prohibited; c) Key natural heritage features and Key Hydrologic Features; d) **All roads;** **~~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)… **f) stormwater management features;** **g) infrastructure;** **h) open space;**	

		l) parkland; and **j) archaeological sites preserved in-situ.**	
4.4.6.3 That Developable Area, as referenced in policy 4.4.6.2, shall also include any lands required for Infrastructure (e.g. local and Regional streets and stormwater management ponds) within the Regional Greenlands System.	Given the direct relationship to policy 4.4.6.2 this policy is an issue for the same reasons.	4.4.6.3 **Delete entirely.**	This policy would be incompatible with policy 4.4.6.2 as requested to be revised and so should be deleted. The Group only requests this deletion if earlier changes to the transition policies are not made.
4.4.6.4 That payment-in-lieu of parkland dedication, or a combination of payment-in-lieu and parkland conveyance, may be considered by the City where such contributions may be more effective in achieving local parkland targets and the objectives of the City's Greenspace Strategic Plan, such as in Strategic Growth Areas where parcels may be too small to result in an effective parkland dedication.	This policy is related to policy 4.4.6.1 and has the same issue of potentially being mistaken as giving the City's Greenspace Strategic Plan the force of a duly enacted planning policy instrument.	4.4.6.4 That payment-in-lieu of parkland dedication, or a combination of payment-in-lieu and parkland conveyance, may be considered by the City **including** ~~**where such contributions may be more effective in achieving local parkland targets and the objectives of the City's Greenspace Strategic Plan, such as**~~ in Strategic Growth Areas where parcels may be too small to result in an effective parkland dedication.	The requested modification minimizes the risk of inappropriately elevating the City's Greenspace Strategic Plan to that of a duly enacted planning policy instrument. The Group only requests this deletion if earlier changes to the transition policies are not made.
4.4.6.5 That if an alternative parkland rate is employed in accordance with the *Planning Act,* such parkland contribution for residential or the residential portion of mixed-use Development or Redevelopment—whether in the form of parkland conveyance or payment-in-lieu as determined by the City—shall be subject to a cap of:	Should Block 27 not be considered fully transitioned, then the issue with this policy is that it is unclear why different nomenclature is being used for: (1) determination of the alternative parkland amount which uses "Developable Area" in policy 4.4.6.2, and, (2) the cap on its provision which uses "Gross Area" in this policy;	4.4.6.5 That if an alternative parkland rate is employed in accordance with the *Planning Act,* such parkland contribution for residential or the residential portion of mixed-use Development or Redevelopment—whether in the form of parkland conveyance or payment-in-lieu as determined by the City—shall be subject to a cap of: a. 10% of the ~~**Gross Area**~~ **Developable Area** or its value, if the ~~**Gross Area**~~	The requested modifications would resolve the issues that might arise as a result of using two separate standards in completing parkland calculations. The Group only requests this deletion if earlier changes to the transition policies are not made.

a. 10% of the Gross Area or its value, if the Gross Area is 5 hectares or less; or b. 15% of the Gross Area or its value, if the Gross Area is greater than 5 hectares.	When the *Planning Act* language for both concepts is the same, being, "land proposed for development or redevelopment". The language in this policy should refer to the definition of "Developable Area" as proposed to be modified.	**Developable Are**a is 5 hectares or less; or b. 15% of the ~~**Gross Area**~~ **Developable Area** or its value, if the ~~**Gross Area**~~ **Developable Area** is greater than 5 hectares.	
4.4.6.6 To require the dedication of parkland for all Development or Redevelopment for a commercial purpose or an industrial purpose at the rate of 2% of the Developable Area. Payment-in-lieu of parkland dedication may be considered by the City where such contributions may be more effective in achieving local parkland targets and objectives identified in the City's Greenspace Strategic Plan.	Should Block 27 not be considered fully transitioned, then the issue with this policy is that it exhibits the recurring issue of potentially being interpreted as elevating the Greenspace Strategic Plan to the level of a duly enacted planning policy instrument.	4.4.6.6 To require the dedication of parkland for all Development or Redevelopment for a commercial purpose or an industrial purpose at the rate of 2% of the Developable Area. Payment-in-lieu of parkland dedication may be considered by the City ~~**where such contributions may be more effective in achieving local parkland targets and objectives identified in the City's Greenspace Strategic Plan**~~.	As with earlier requests the modifications attempt to avoid mistakenly elevating the City's Greenspace Strategic Plan to that of a duly enacted planning policy instrument. The Group only requests this deletion if earlier changes to the transition policies are not made.
4.4.6.7 That parklands classified by the City as Destination Parks, Regional Parks, District Parks, Neighbourhood Parks, Urban Parks, and Public Squares are eligible for parkland dedication credits through the Development process, as described in the City's Parkland Dedication By-Law.	Should Block 27 not be considered fully transitioned, the issue is that the policy is not explicit that such parks are eligible for full credit, as other types of parks are eligible for partial credit in the Parkland Dedication By-law.	4.4.6.7 That parklands classified by the City as Destination Parks, Regional Parks, District Parks, Neighbourhood Parks, Urban Parks, and Public Squares are eligible for **full** parkland dedication credits through the Development process, as described in the City's Parkland Dedication By-Law.	The requested modification would bring the policy into closer alignment with the City's Parkland Dedication By-law while avoiding a potential ambiguity about the quality of credits due. The Group only requests these modifications if earlier changes to the transition policies are not made.
4.4.6.8 That Privately Owned Public Spaces may be eligible for parkland dedication credits toward	There is a likely typo in policy 4.4.6.8(a) because the policy is referring to requirements, but policy 4.4.5.2 does not list requirements, unlike 4.4.5.3.	4.4.6.8 That Privately Owned Public Spaces may be eligible for parkland dedication credits toward	The requested modification is proposed to correct a suspected typo.

satisfying the parkland dedication requirements for a Development or Redevelopment, where: a. all requirements established in policies 4.4.4.2 and 4.4.5.2 of this Plan are met; and b. credits are limited to 100% of the parkland dedication requirement and banking of excess credits is prohibited.	For a further explanation of the issues, please see policy 4.4.5.3 below.	satisfying the parkland dedication requirements for a Development or Redevelopment, where: a. all requirements established in policies 4.4.4.2 and ~~**4.4.5.2**~~ **4.4.5.3** of this Plan are met; and b. credits are limited to 100% of the parkland dedication requirement and banking of excess credits is prohibited.	
4.4.5.3 That Privately Owned Public Spaces shall provide recreational functions and features and meet the following base requirements: a. be of sufficient size and dimensions in a rectangular geometric configuration to support the intended recreational functions and programming requirements; b. be located entirely outdoors at established grade, not contained within, above, under, or internal to any building or structure; c. include both Active Recreational Uses and Passive Recreational Uses appropriate for the size and location; d. incorporate active ground-floor uses along all building frontages adjacent to the space, with no blank facades, service areas, or other non-active uses;	Should Block 27 not be considered fully transitioned, this policy has the following issues: 4.4.5.3(a) limits park shapes to being rectangular, which does not acknowledge that many desirable configurations are not rectangular. 4.4.5.3(b) references “established grade” which is a specifically defined term in the zoning by-law and is too prescriptive for an Official Plan. This policy should instead refer to “ground level” to avoid complication. 4.4.5.3(d) requires active ground-floor uses along all building frontages adjacent to a POPS. In our experience it might not always be possible or desirable to have such facades, so, this should be qualified with “where appropriate”. 4.4.5.3(e) outlines a variety of strict performance standards related to POPS frontage and should be worded to allow	4.4.5.3 That Privately Owned Public Spaces shall provide recreational functions and features and meet the following base requirements: a. be of sufficient size and dimensions ~~**in a rectangular geometric configuration**~~ to support the intended recreational functions and programming requirements; b. be located entirely outdoors at **ground level** ~~**established grade**~~, not contained within, above, under, or internal to any building or structure; c. include both Active Recreational Uses and Passive Recreational Uses appropriate for the size and location; d. **where appropriate,** incorporate active ground-floor uses along all building frontages adjacent to the space, with no blank facades, service areas, or other non-active uses;	The requested modifications are intended to maintain a policy focused approach and avoid being overly prescriptive at the official plan level. The Group only requests these modifications if earlier changes to the transition policies are not made.

e. be located with direct frontage onto at least one public street and maintain a minimum of 50% of the space's total frontage onto any combination of public streets, public parks, Mews with public access easements, or other publicly accessible City-owned spaces, with no more than 25% of total frontage achieved through Mews with public access easements; f. respond to identified community needs and programming objectives; and g. be encouraged for completion within early Development phases to maximize community benefit.	POPS to "be highly visible for pedestrians, with frontage on, or direct access and connection to, at least one public street."	e. ~~**be located with direct frontage onto at least one public street and maintain a minimum of 50% of the space's total frontage onto any combination of public streets, public parks, Mews with public access easements, or other publicly accessible City-owned spaces, with no more than 25% of total frontage achieved through Mews with public access easements;**~~ **be highly visible for pedestrians, with frontage on, or direct access and connection to, at least one public street**; f. respond to identified community needs and programming objectives; and g. be encouraged for completion within early Development phases to maximize community benefit.	
4.4.6.9 That Mews, private drives, and private outdoor amenity spaces shall not be counted toward parkland dedication requirements, regardless of whether they are subject to public access easements.	Should Block 27 not be considered fully transitioned, the issue with this policy is that Mews, as pedestrian priority areas that may incorporate special design components, such as custom surface treatments, moveable planters, furnishings, accent lighting, and/or installations between buildings, that could serve parkland or POPs, are presumptively excluded from being considered part of the park they serve. For example, a Mews might equally be considered an enhanced entry point	4.4.6.9 That ~~**Mews,**~~ private drives, and private outdoor amenity spaces shall not be counted toward parkland dedication requirements, regardless of whether they are subject to public access easements.	The requested modification would allow flexibility, depending on the design and function of a Mews, for it to be considered as part of the park it ultimately serves which seems a probable scenario. The Group only requests the modification if earlier changes to the transition policies are not made.

	within a park rather than something external to it.		
4.4.6.10 That existing parks shall be maintained in public ownership, and that the establishment of new parks will be prioritized through the parkland dedication policies of this Plan, prioritizing fee simple land over encumbered lands, stratified lands, Privately Owned Public Spaces, or payment-in-lieu.	No issue.		
4.4.6.11 That where a proposed park is identified within the limits of a property, the applicable park lands shall be dedicated to the City as a condition of the first residential Development approval within the limits of the property and, where necessary, be subject to appropriate legal agreements respecting interim use of the land for parking for existing uses, construction access, and staging purposes, at a nominal fee to the landowner.	Should Block 27 not be considered fully transitioned, the issue is that this policy contains an internal conflict. Part of this policy appears to require that parkland dedication obligations be met, in full, at the time of the first residential approval. However, later the policy appears to make fulfilment of parkland dedication obligations subject to staging. Given the internal conflict there is a risk that the policy would be read to limit flexibility for staged delivery of parkland. While the policy appears to acknowledge that in a multi-phased development, it may not be desirable to convey all parklands as a condition of the first residential development approval, that policy principle is not a certainty, when it ought to be.	4.4.6.11 That where a proposed park is identified within the limits of a property, the applicable park lands shall be dedicated to the City as a condition of ~~**the first residential Development**~~ approval within the limits of the property and, where necessary, be subject to appropriate legal agreements respecting interim use of the land for parking for existing uses, construction access, and staging purposes, at a nominal fee to the landowner.	The requested modifications would allow flexibility for staged delivery of parkland obligations. Staged delivery allows the cost obligation of cash-in-lieu to be matched to the progress of development in accordance with the apparent intent of the policy. Ensuring parkland obligations progress with development approvals in staged situations is an important component of maintaining affordability by not overburdening development too early in the process which can impose avoidable carrying costs. The Group only requests the modification if earlier changes to the transition policies are not made.

4.4.6.12 That those lands containing Core Features of the Natural Heritage Network or major utilities such as TransCanada Pipelines Limited, Hydro One, or rail corridors, including environmental and safety buffers and zones, will not be accepted for the purposes of satisfying parkland dedication requirements, unless as described in the Parkland Dedication By-law.	No issue.		
4.4.6.13 That parkland conveyed shall be credited net of all encumbrances, including but not limited to utilities/utility boxes, mailboxes and/or access, servicing easements, private structures and easements, and building overhangs.	Should Block 27 not be considered fully transitioned, the issue with this policy is that in situations where POPS are above structures like an underground parking garage they may not be counted toward meeting the parkland dedication requirement, despite the language in sections 2(3), 3(1), 3(2), 3(4) of the City's Parkland Dedication By-law indicating the opposite intent. This policy also appears to contradict the POPS and Strata Parks policies in VOP 2025.	4.4.6.13 **Delete entirely.**	The requested deletion would eliminate the conflict between the New Vaughan Official Plan and the City's Parkland Dedication By-law. The Group only requests this deletion if earlier changes to the transition policies are not made.