January 22, 2026
HPGI File: 25930

The Ministry of Municipal Affairs & Housing
Community Planning & Development (Central-Urban) Unit
College Park, 16th Floor
777 Bay Street
Toronto, Ontario
M7A 2J3

Re: City of Vaughan Official Plan, 2025
11860 Pine Valley Drive: Lorwood Holdings Incorporated
12000 Pine Valley Drive: Lorwood Holdings Incorporated
4581 King Vaughan Line Road: 130 Doughton Road Investments Inc.
12100 Pine Valley Drive: Vittoria Guglietti

Humphries Planning Group Inc. ("HPGI") represents Lorwood Holdings Incorporated, 130 Doughton Road Investments Inc. and Vittoria Guglietti, owners of the lands legally known as Part of Lots 33-35, Concession 7 and addressed as 4581 King Vaughan Road, and 11860, 12000, 12100 Pine Valley Drive, all being within the southwest quadrant of King Vaughan Road and Pine Valley Drive (Block 49) in the City of Vaughan. On November 5, 2025, notice was issued by the City of Vaughan where it was stated that the Vaughan Official Plan, 2025 (VOP 2025) has been submitted to the Minister of Municipal Affairs and Housing for Approval. HPGI had previously submitted letters to the City of Vaughan during the review process prior to adoption; attached for reference herein. On behalf of the owners, we are submitting the following comments and requests which were not addressed previously.

Highway 413 Focused Analysis Area

On November 27, 2025, the Ontario Government designated Highway 413 under the Public Transportation and Highway Improvement Act resulting in the release of properties in the FAA and Narrowed Area of Interest that are not anticipated to be impacted by Highway 413 or the Northwest GTA Transmission Corridor. Accordingly, the mapping for Highway 413 was updated to reflect the removal of the FAA. The figure below shows how the owners' land looks on the current mapping.

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Previous mapping from the Highway 413 team indicated that portions of the owners' lands were within the FAA, which is reflected in the following schedules in VOP 2025:

- Schedule 1 – Urban Structure
- Schedule 1A – Urban Area
- Schedule 1B – Strategic Growth Areas
- Schedule 9A – Street Classification
- Schedule 9B – Planned Street Rights-of-Way
- Schedule 9C – Cycling Facilities and Trails
- Schedule 10 – Major Transit Network

Requested Change: As the submission of VOP 2025 to the Minister for approval predates

the removal of the FAA for Highway 413, we ask that the schedules listed above be modified to reflect the removal of the FAA as it relates to the owners' lands and reflects what is currently shown on the Highway 413 interactive mapping.

Land Use

The current mapping for the lands on **Schedule 1 – Urban Structure** illustrates that the lands are proposed to be located in the Employment Area. Further, **Schedule 14A- Areas Subject to Secondary Plans** indicates that these lands will be subject to Required Secondary Plan Area 4 for New Employment Area.

The anticipated land area available for development is limited and fragmented in nature given greenbelt plan boundary and Highway 413 land requirements. The proposed Employment land use designation is also questionable for these lands. Employment land need requirement trends are for large properties suitable and capable of housing logistic uses. As the lands are affected by the Greenbelt Plan and Highway 413 alignment, a comprehensive/efficient design of development blocks for large footprint users may be difficult to achieve.

Employment uses also require convenient access to major access routes. It is noted that no access to the 413 from Pine Valley Drive is proposed as part of the MTO plans. Pine Valley Drive will require a bridge over the proposed 413 at this location which will further limit potential points of access. The closest full interchange areas are located at Highway 27 to the west and Highway 400 to the east. Further to such, it is not clear how employment lands will be able to access this area without substantial arterial roadway improvements being undertaken along many major roads linking the lands to major highway/ 400 series highways. Further, the existence of the 413, when /if it is constructed will preclude interconnectivity within the block because of the highway further fragmenting the land area.

In accordance with Section 2.8.2.5 of the Provincial Planning Statement (2024), planning authorities may remove lands from employment areas where it has been demonstrated that:

a) there is an identified need for the removal and the land is not required for employment area uses over the long term;

b) the proposed uses would not negatively impact the overall viability of the employment area by:

1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;

2. maintaining access to major goods movement facilities and corridors;

c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and

d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.

The above noted policies have been considered specifically as related to the lands as follows:

a) As discussed in the contextual description provided above, portions of the lands are being removed for provincial infrastructure and will not be developed due to natural heritage systems and associated features. These removals would be permanent in nature and reduce the overall utility of the remainder of the land for viable employment use commensurate with current employment development trends of large tracts of land for logistic warehousing uses.

b) Due to the nature of the constraints the land will be fragmented and isolated from other employment areas. The removal of the land from the employment designation will not affect adjacent employment areas east of Pine Valley Drive. The location of the land as discussed above has no direct or near access to major goods movement facilities and corridors and will not have any impact on such. In fact, existing roads and proposed overpasses will be required which may further impede convenient access to existing arterial roads.

c) Future secondary planning will be required for the lands. Currently no servicing infrastructure exists nearby. Employment lands historically have not expedited servicing infrastructure into new development areas while other lands are able to be developed. Redesignating the lands for Community land uses would accelerate the demand for servicing infrastructure and public facilities to the area in a more expedient manner.

d) The removal of the lands from the overall employment land base is anticipated to have a minor impact on projected employment growth to the horizon of the approved official plan.

For these reasons, *community land uses which can be more easily accommodated for the subject lands is more appropriate.*

Requested Change: We request that the employment land use designation be replaced with a community land use designation for the lands and that the secondary plan requirement also be modified such that it corresponds with a community use plan, *not* an employment plan.

Secondary Plans (Section 5.1.1)

It is not apparent that a separate secondary plan will be undertaken for the lands west of Pine Valley Drive. We request that, given the smaller land area involved for the lands in Block 49 fronting Pine Valley Drive, a separate secondary plan process be undertaken based on better efficiency and timing to complete such.

Requested Change: That these lands be entitled to their own secondary plan application.

Block Plans (Section 5.1.2)

Given the small area of land involved, we request that these lands be exempt from a Block Planning process requirement. Detailed study can be undertaken during either the secondary plan study process or as part of subdivision/site plan application process.

Requested Change: That these lands specifically be exempt from the Block Plan process.

Infrastructure

Section 4.7 of the draft new VOP sets of infrastructure policies including water, sanitary, stormwater and other servicing provisions.

Section 4.7.2.10(a) states:

That, in coordination with York Region, water and wastewater systems shall be sized to consider the potential for expansion of the service area, Intensification and increased servicing allocation where permitted by this Plan, York Region Master Plans and Provincial plans, based on planning horizons, as determined by the City of Vaughan, into areas designated for urban Development and to accommodate all natural tributary areas subject to:

a. *phasing growth in new communities to provide for substantial completion, approximately 75%, of one phase prior to proceeding to future phases;*

Request Change: Add "unless otherwise approved by the City" to Policy 4.7.2.10(a).

Section 4.7.3.8 states that it is the policy of Council " *To require that proposed stormwater management quality, quantity, erosion control and water balance for ground water and natural features be developed as part of a Master Environment and Servicing Plan to permit proper assessment of Development impacts upon environmental features".*

Requested Change: Modify policy to add "where applicable at the Block Plan and subdivision stage".

Section 4.7.3.13 states that it is the policy of Council *" To require that all Significant Developments provide post-Development stormwater quantity control to pre-Development levels for all storm events and stormwater quantity control in accordance with current guidelines in consultation with the TRCA and the Ministry of Environment, Conservation and Parks. Should a subsequent TRCA-approved Watershed hydrology study indicate that an alternative runoff control requirement is appropriate, alternative criteria may be established by the City in consultation with TRCA".*

Requested Change: Removing the word "subsequent" as approved watershed hydrology studies already exist that require alternative criteria in specific areas.

Thank you for your consideration of our comments and requests. On behalf of the owners, we request to be notified concerning the decision of approval for the City of Vaughan Official Plan 2025.

Yours truly,
HUMPHRIES PLANNING GROUP INC.

R Humphries

Rosemarie Humphries BA, MCIP, RPP
President

cc. client

Attch. Letter – HPGI Comment Letter on May 2025 version of Draft New Vaughan Official Plan 2025, dated June 2, 2025
Letter – HPGI Comment Letter on September 2025 version of Draft New Vaughan Official Plan 2025, dated September 29, 2025

September 29, 2025
HPGI File: 25930

SUBMITTED VIA EMAIL:
oprmanager@vaughan.ca
clerks@vaughan.ca

City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Attn: Fausto Filipetto, Project Manager

Re: September 30, 2025 Committee of the Whole – Item 1
Proposed New Vaughan Official Plan 2025 (September 2025)
11860 Pine Valley Drive: Lorwood Holdings Incorporated
12000 Pine Valley Drive: Lorwood Holdings Incorporated
4581 King Vaughan Line Road: 130 Doughton Road Investments Inc.
12100 Pine Valley Drive: Vittoria Guglietti

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Contextual Description
The lands are currently used for farming and residential uses and comprise a total combined area of 122.9 ha.

Greenbelt Plan
The Greenbelt Plan boundary is located along the west/southern limits of the lands which comprise an estimated 18.1ha of the total land holdings.

Toronto and Region Conservation Authority Regulation
The Toronto and Region Conservation Authority ('TRCA') has completed its annual review and draft updates to the mapping that shows the TRCA Regulated Area across their

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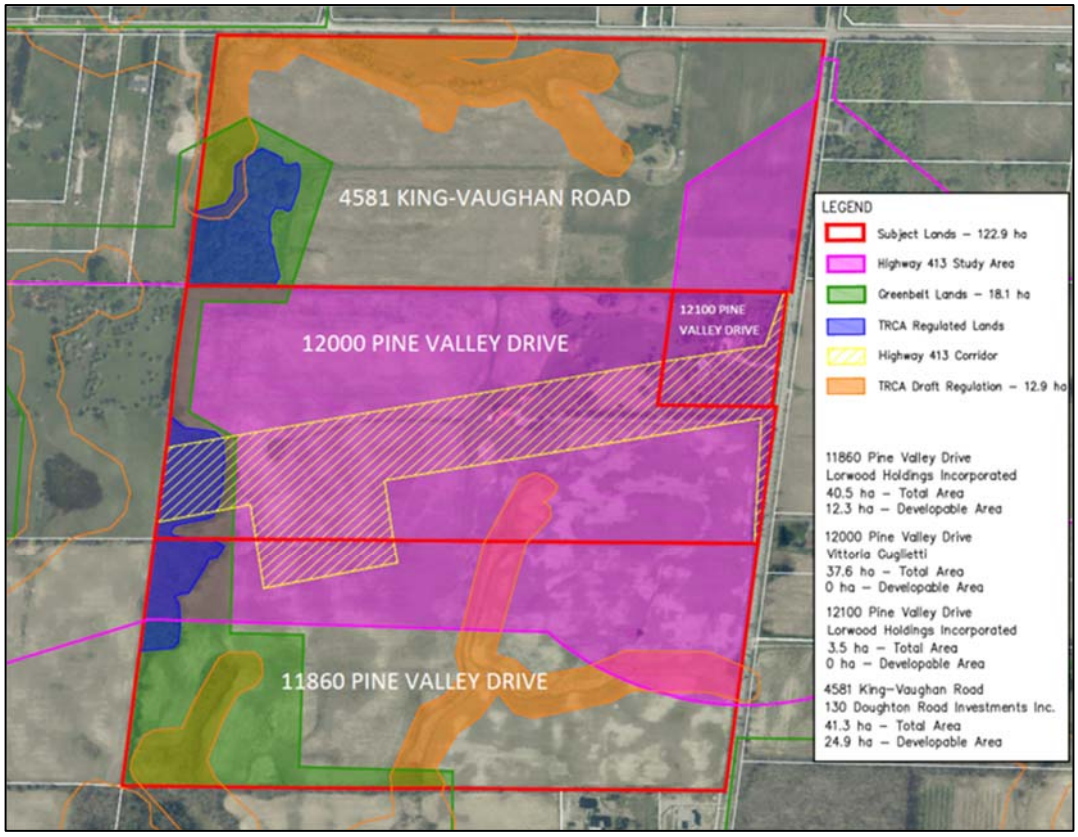
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jurisdiction. Based on current draft regulation mapping, it is estimated that an area of 12.9 ha of land is regulated by TRCA thereby further fragmenting developable area of the lands and potentially affecting access and development efficiencies for large lot employment users.

Highway 413 Alignment

The MTO Highway 413 Study materials effective May 2025 depict the Preliminary Highway Design which includes the Focused Analysis Area (May 2025) traversing through the area of the lands in an east/west direction. It is also noted that there is no direct access to the 413 is proposed at/near these lands. Based on current design plans it is estimated that an area of 15.4ha of land will be impacted.

Given the above major land use planning considerations, a reduced land area of 37.2ha may be available for development.



City of Vaughan Draft Official Plan 2025

We have undertaken a cursory review of the proposed document and schedules and provide the following comments as they relate to the owners Lands.

Land Use

The current mapping for the lands on **Schedule 1 – Urban Structure** illustrates that the lands are proposed to be located in the Employment Area. Further, **Schedule 14A- Areas Subject to Secondary Plans** indicates that these lands will be subject to Required Secondary Plan Area 4 for New Employment Area.

The anticipated land area available for development is limited and fragmented in nature given greenbelt plan boundary and Highway 413 land requirements. The proposed Employment land use designation is also questionable for these lands. Employment land need requirement trends are for large properties suitable and capable of housing logistic uses. As the lands are affected by the Greenbelt Plan and Highway 413 alignment, a comprehensive /efficient design of development blocks for large footprint users may be difficult to achieve.

Employment uses also require convenient access to major access routes. It is noted that no access to the 413 from Pine Valley Drive is proposed as part of the MTO plans. Pine Valley Drive will require a bridge over the proposed 413 at this location which will further limit potential points of access. The closest full interchange areas are located at Highway 27 to the west and Highway 400 to the east. Further to such, it is not clear how employment lands will be able to access this area without substantial arterial roadway improvements being undertaken along many major roads linking the lands to major highway/ 400 series highways. Further, the existence of the 413, when /if it is constructed will preclude interconnectivity within the block because of the highway further fragmenting the land area.

In accordance with Section 2.8.2.5 of the Provincial Planning Statement (2024), planning authorities may remove lands from employment areas where it has been demonstrated that:

a) there is an identified need for the removal and the land is not required for employment area uses over the long term;

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b) Due to the nature of the constraints the land will be fragmented and isolated from other employment areas. The removal of the land from the employment designation will not affect adjacent employment areas east of Pine Valley Drive. The location of the land as discussed above has no direct or near access to major goods movement facilities and corridors and will not have any impact on such. In fact, existing roads and proposed overpasses will be required which may further impede convenient access to existing arterial roads.
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For these reasons, *community land uses which can be more easily accommodated for the subject lands is considered to be more appropriate.*

Requested Change: We request that the employment land use designation be replaced with a community land use designation for the lands and that the secondary plan requirement also be modified such that it corresponds with a community use plan, *not* an employment plan.

<u>Secondary Plans (Section 5.1.1)</u>

It is not apparent that a separate secondary plan will be undertaken for the lands west of Pine Valley Drive. We request that given the smaller land area involved for the lands in Block 49 fronting Pine Valley Drive, a separate secondary plan process be undertaken on the basis of better efficiencies and timing to complete such.

Requested Change: That these lands be entitled to their own secondary plan application.

Block Plans (Section 5.1.2)

Given the small area of land involved, we request that these lands be exempt from a Block Planning process requirement. Detailed study can be undertaken during either the secondary plan study process or as part of subdivision/site plan application process.

Requested Change: That these lands specifically be exempt from the Block Plan process.

Infrastructure

Section 4.7 of the draft new VOP sets of infrastructure policies including water, sanitary, stormwater and other servicing provisions.

Section 4.7.2.10(a) states:

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Recommendation: Add "unless otherwise approved by the City" to Policy 4.7.2.10(a).

Section 4.7.3.8 states that it is the policy of Council " *To require that proposed stormwater management quality, quantity, erosion control and water balance for ground water and natural features be developed as part of a Master Environment and Servicing Plan to permit proper assessment of Development impacts upon environmental features".*

Recommendation: Modify policy to add "where applicable at the Block Plan and subdivision stage".

Section 4.7.3.13 states that it is the policy of Council *" To require that all Significant Developments provide post-Development stormwater quantity control to pre-Development levels for all storm events and stormwater quantity control in accordance*

with current guidelines in consultation with the TRCA and the Ministry of Environment, Conservation and Parks. Should a subsequent TRCA-approved Watershed hydrology study indicate that an alternative runoff control requirement is appropriate, alternative criteria may be established by the City in consultation with TRCA".

Recommendation: Removing the word "subsequent" as approved watershed hydrology studies already exist that require alternative criteria in specific areas.

Thank you for your consideration of our comments and we look forward to working closely with Council, Staff and other stakeholders throughout the completion of the new Official Plan.

On behalf of the owners, we request to be notified concerning the City's New Official Plan including any and all future Council/Committee meetings, as well as the adoption and approval of the new Vaughan Official Plan.

Yours truly,
HUMPHRIES PLANNING GROUP INC.

R Humphries

Rosemarie Humphries BA, MCIP, RPP
President

cc. client

June 2, 2025
HPGI File: 25930

SUBMITTED VIA EMAIL:
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clerks@vaughan.ca

City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Attn: Fausto Filipetto, Project Manager

Re: Request for Modifications
Draft New Vaughan Official Plan 2025
Part of Lots 33-35, Concession 7 (Block 49)
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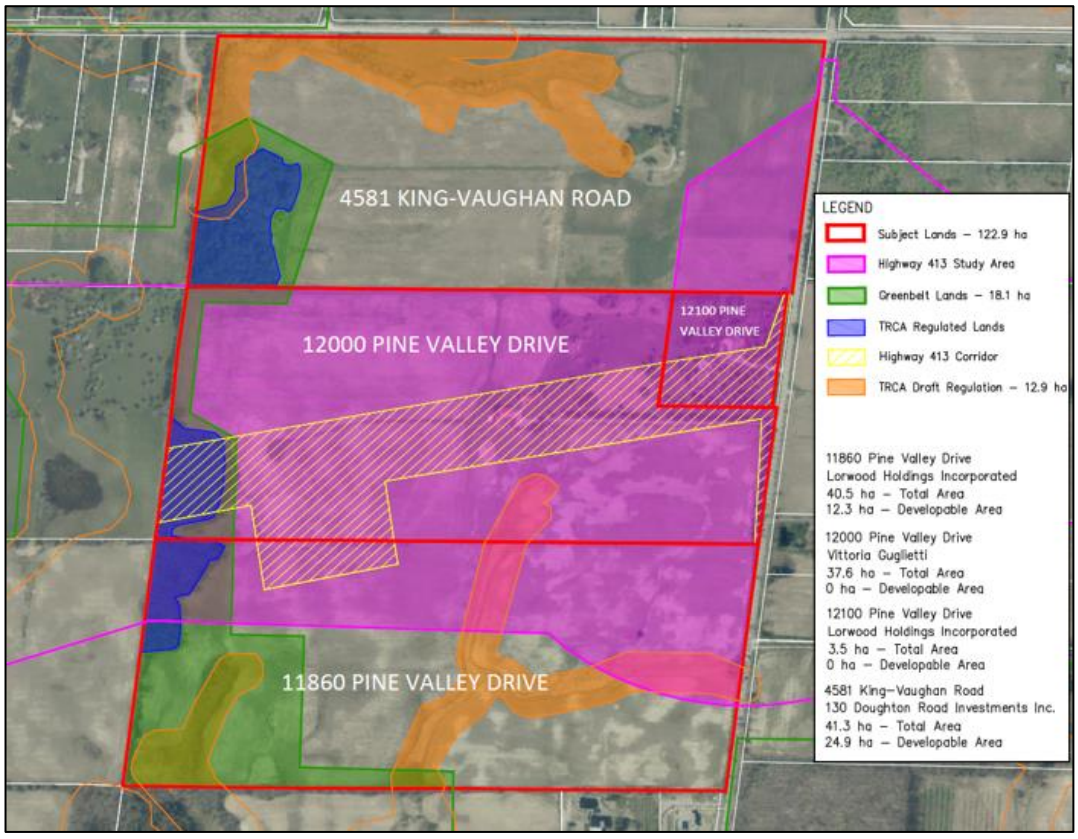
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In accordance with Section 2.8.2.5 of the Provincial Planning Statement (2024) planning authorities may remove lands from employment areas where it has been demonstrated that:

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The above noted policies have been considered specifically as related to the lands as follows:

a) As discussed in the contextual description provided above, portions of the lands are being removed for provincial infrastructure and will not be developed due to natural heritage systems and associated features. These removals would be permanent in nature and reduce the overall utility of the remainder of the land for viable employment use commensurate with current employment development trends of large tracts of land for logistic warehousing uses.

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d) The removal of the lands from the overall employment land base is anticipated to have a minor impact on projected employment growth to the horizon of the approved official plan.

For these reasons, *community land uses which can be more easily accommodated for the subject lands is considered to be more appropriate.*

Requested Change: We request that the employment land use designation be replaced with a community land use designation for the lands and that the secondary plan requirement also be modified such that it corresponds with a community use plan, *not* an employment plan.

New Community Areas and New Employment Areas (Section 2.3.1)

Further clarification is required with respect to proposed Policy 2.3.1.4 which states that "*the preparation of secondary plans for new community areas and new employment areas west of Highway 400 shall proceed until the future route of the proposed Provincial highway 413 has been confirmed or at the discretion of the Province."* It is unclear what the precise intention is for this policy. Does this mean an amendment to an existing secondary plan can proceed? Does this mean that as of May 2025 accounting for the provinces 413 online mapping a planning process can proceed as long as development is located outside the reduced Focus Area? As currently worded this policy is overly vague and needs to be clarified.

Requested Change: Revise policy 2.3.1.4 as currently written to establish clarity/certainty.

Secondary Plans (Section 5.1.1)

It is not apparent that a separate secondary plan will be undertaken for the lands west of Pine Valley Drive. We request that given the smaller land area involved for the lands in Block 49 fronting Pine Valley Drive, a separate secondary plan process be undertaken on the basis of better efficiencies and timing to complete such.

Requested Change: that these lands be entitled to their own secondary plan application.

Block Plans (Section 5.1.2)

Given the small area of land involved, we request that these lands be exempt from a Block Planning process requirement. Detailed study can be undertaken during either the secondary plan study process or as part of subdivision/site plan application process.

Requested Change: That these lands specifically be exempt from the Block Plan process.

Natural Heritage

Policy 2.7.3.2 states that *the policy text of Section 2.7.3 prevails over the mapping shown on Schedule 2 in determining the Natural Heritage Network. The precise limits of mapped Natural Heritage Features and Areas, and any modifications to the mapped network, shall be determined through appropriate study undertaken in consultation with the TRCA and the Province. This may occur on a site-by-site basis through the Development process or through studies carried out by the City or other government agencies. Unmapped features identified through fieldwork and appropriate technical studies via the planning process, including those for natural hazard management, are part of the Natural Heritage Network*

and, as such, are subject to applicable policies prior to mapping refinement. Consultation with TRCA seems inappropriate given their new regulatory role under the Conservation Authorities Act.

Requested Change: Remove all statements referring to the review, approval, clearance and/or recommendation by the TRCA from this policy.

Infrastructure

Section 4.7.3.11 states that it is the policy of Council *"To require that proposed stormwater management quality, quantity, erosion control and water balance for ground water and natural features be developed as part of a Master Environment and Servicing Plan to permit proper assessment of Development impacts upon environmental features".*

Requested Change: Modify policy to include "at the Block Plan stage" and "subdivision" to provide additional clarity and guidance.

Section 4.7.3.16 states that it is the policy of Council *"To require that all Significant Developments provide post-Development stormwater quantity control to pre-Development levels for all storm events and stormwater quantity control in accordance with current guidelines in consultation with the TRCA and the Ministry of Environment, Conservation and Parks. Should a subsequent TRCA-approved Watershed hydrology study indicate that an alternative runoff control requirement is appropriate, alternative criteria may be established by the City in consultation with TRCA".*

Requested Change: Removing the word "subsequent" as approved watershed hydrology studies already exist that require alternative criteria in specific areas.

4.7.3.8(a), 4.7.3.12, and 4.7.3.14 reference consultation with the Province or MECP. There are several instances that make reference to consultation with the Province or the MECP. **However, we ask that the City add "where applicable" to these sections as consultation with MECP is not always required. In most cases, it may be sufficient to address technical concerns with only the City and the Conservation Authority**.

Thank you for your consideration of our comments and we look forward to working closely with Council, Staff and other stakeholders throughout the completion of the Official Plan Update.

We request to be notified concerning the City's Official Plan Review including any and all future Council/Committee meetings, community meetings and consultation as well as the release of any discussion papers or proposed amendments to the VOP.

Yours truly,
HUMPHRIES PLANNING GROUP INC.

Rosemarie Humphries BA, MCIP, RPP
President

cc. client
Mayor and Members of Council