BOUSFIELDS INC.

Project No. 23302

January 28, 2026

Ministry of Municipal Affairs and Housing (MMAH)
Municipal Services Office – Central Ontario
16th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3
matthew.meighoo@ontario.ca

Attention: Honourable Rob Flack, Minister of Municipal Affairs and Housing (MMAH)
c/o Matthew Meighoo, MMAH – Central Ontario

Re: MMAH ERO for Vaughan Official Plan (VOP 2025)
ERO Number: 025-1420 – MMAH Reference Number: 19-OP-246866
City of Vaughan By-law 241-2025

This letter is submitted on behalf of 2678463 Ontario Ltd., 2678462 Ontario Ltd., and Rutherford Land Development Corporation (the 'Owners'), the owners of 1890 Highway 7, 2160 and 2180 Highway 7 and 2901 Rutherford Road and 0 Caldari Road respectively, in response to City of Vaughan By-law 241-2025 and ERO No. 025-1420 respecting the City of Vaughan Official Plan 2025 ('VOP 2025'), as adopted by Council on October 22, 2025 and currently before the Minister of Municipal Affairs and Housing as approval authority.

The Owners have actively participated in the City of Vaughan Draft Privately Owned Public Space ('POPS') Guidelines and Standards working group in late 2024 and 2025. Through that process, the Owners raised concerns that the draft POPS are too prescriptive and drafted in such a way to not provide any or only partial parkland credit to POPS. It was surprising that draft guidelines were then included in Vaughan's Official Plan, without consideration on implementation.

Our primary comments/concerns with Section 4.4.5.3 of the City of Vaughan's Official Plan, are as follows:

- **Need to deliver open space in all forms** -- If the objective is to create much needed open space near new housing development projects, there should be opportunities to create a multitude of open spaces to support both active and/or passive programs.
- **POPS are Complementary** -- POPS are complementary to a traditional park and provide accessible and on-site opportunities to create a strong public realm—the City should be supportive of delivering these spaces and should not create barriers and rigid, unattainable requirements.
- **Need for tailored program to respond to each individual site** -- The design of the POPS should be tailored to respond to the potential programs of these spaces. Requiring Active Recreational Uses and Passive Recreational Uses may not be possible in an urban context and as such these guidelines seem designed to

restrict rather than facilitate POPS. In addition, suggesting that a POPS must follow a rectangular geometric configuration in an Official Plan seems rigid – the objective should be around useability and visibly clear access.

- **More flexible programming** -- 'Active Recreational Uses' is defined as speciality facilities such as a tennis court, full basketball court, soccer field, ice skating rink etc. As noted above, requiring POPS to include Active Recreational Uses may not be possible for most urban development sites. In our view, the proposed inflexibility in the policies will not serve the public interest in obtaining a range of open spaces within intensifying areas. As currently drafted, the rigid policies would not allow for POPS spaces to obtain parkland credits. As such, these policies introduce constraints rather than opportunities to providing POPS spaces in urban areas of Vaughan.
- **Accessibility in an urban context** -- POPS must be publicly accessible and visible but applying rigid 50% street frontage may be challenging in an urban condition, especially for an infill development project where the land area available may be limited.

Further to the above, we request that subclause a. and b. in Section 4.4.6.8 be deleted which provides that all requirements established in policies 4.4.4.2 and 4.4.5.2 of the Official Plan be adhered to.

We request that Section 4.4.5.3 section be deleted and Section 4.4.6.8 be modified (as per above) from the City's Official Plan and that POPS be addressed through the finalization of the guideline document itself. We believe that the rigid POPS requirements are not appropriate in the Official Plan and best to be addressed on a site-specific review in consultation with the City. We agree that Section 4.4.5.4, which provides clarification on the parkland credits, is appropriate and no modifications are suggested.

We appreciate your consideration of the above and we are available to provide any additional information or respond to any questions at your convenience.

Yours truly,

Bousfields Inc.



Michael Bissett, MCIP, RPP