MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

January 29, 2026

The Honourable Rob Flack, Minister of Municipal Affairs and Housing
Ministry of Municipal Affairs and Housing
777 Bay St, College Park, 17th Floor
Toronto, Ontario
M5J 2C8

Via email: mmahofficialplans@ontario.ca

Dear Minister Flack:

RE: 3940 HIGHWAY 7 AND CITY OF VAUGHAN – APPROVAL OF A MUNICIPALITY'S OFFICIAL PLAN
ERO NUMBER: 025-1420
MHBC: FILE Y329T

MacNaughton Hermsen Britton Clarkson ("MHBC") represents CP REIT Ontario Properties Limited ("Choice REIT") for land use planning matters regarding their property, generally located at Highway 7 and Ansley Grove Road, municipally addressed as 3940 Highway 7 in the City of Vaughan (the "Subject Lands"). The Subject Lands have a lot area of 3.62 ha and currently contains a grocery store, seasonal garden centre and associated surface parking.

Background

Choice REIT previously submitted comment letters on August 01, 2024, regarding Draft #1 of the Comprehensive OPA for the Vaughan Official Plan ("Draft #1 of the OPA"), on March 04, 2025, regarding the new Draft Vaughan Official Plan ("Draft VOP, 2025"), and on June 02, 2025 regarding the new Draft Official Plan 2025 Volume 1 ("OP 2025 Volume 1"). It is noted that Choice REIT also previously submitted comment letters on September 12, 2023, pertaining to Draft #1 Weston 7 Secondary Plan ("W7SP") and on October 31, 2023, pertaining to Draft #2 of the W7SP.

At the encouragement of City staff and Members of Council, the Weston 7 Landowners Group ("W7LOG") was established in January 2024 which included the membership of Choice REIT as a participating owner to streamline landowner engagement and consolidate technical and policy feedback. As a member of the W7LOG, the landowners participated in meetings with staff from the City of Vaughan and York Region along with other forms of engagement including: submitting a letter and redlined chart on May 01, 2024, regarding Draft #2 of the W7SP; participating in a public deputation at the June 05, 2024 Committee of the Whole Meeting on Draft #2 of the W7SP; submitting a letter to Mayor Steven Del Duca and Members of City of Vaughan Council on January 21, 2025 requesting to defer the W7SP; submitting a comment letter on April 08, 2025, regarding the Draft VOP, 2025; submitting a comment letter on June 03, 2025 pertaining to the Draft #5 of the W7SP; and,

submitting another letter to Mayor Steven Del Duca and Members of City of Vaughan Council on September 29, 2025 requesting further dialogue and collaboration on the W7SP. It is noted that Choice REIT formally exited the W7LOG on November 14, 2025.

However, despite Choice REIT's efforts of to provide commentary on the City of Vaughan's new Official Plan and Weston 7 Secondary Plan as an individual entity and as a participating owner of the W7LOG, the City of Vaughan was unable to incorporate the revisions to policies as recommended. Through this submission, Choice REIT is requesting that the Ministry, in its consideration of the approval of the municipality's new official plan, Vaughan Official Plan 2025 ("VOP 2025"), including updated policies for the Proposed New Weston 7 Secondary Plan ("New W7SP") include the following policy recommendations.

VOP 2025

The following table provides the outstanding commentary that was previously submitted from Choice REIT on the OP 2025 Volume 1, the response from City staff in the VOP 2025, and our recommendations.

OP 2025 Volume 1 Policy Comment	VOP 2025 City Response	Recommendation
As per Table 2.1, Population and Employment Data and Forecasts for the City of Vaughan, 2016-2051, in the OP 2025 Volume 1, the City of Vaughan is forecasted to grow to a population of 398,300 by 2031, 478,900 by 2041, and 575,900 by 2051. In contrast, the previous Draft #1 of the OPA, states that the City is forecasted to grow to a population of 407,300 by 2031, 487,500 by 2041, and 576,200 by 2051.	No change.	To revert Table 2.1, the Population and Employment Data and Forecasts to the forecasted population growth numbers provided in the previous Draft #1 of the OPA. Or implement a series of growth thresholds as was incorporated in the Vaughan Metropolitan Centre ("VMC") Secondary Plan. We would also recommend an interim growth strategy as well as an ultimate capacity/full buildout that acknowledges that growth will go beyond the planning horizon of 2051. The Subject Lands are located within an SGA and PMTSA which are designated for intensification, and the decrease in population growth contradicts the policies of these designation areas which may restrict land use permissions and scale of growth in the VOP 2025.

Section 4.4.3.1 categorizes 'Privately Owned Public Spaces' as an 'Open Space Typology' which may be publicly or privately owned, over and above parkland dedication. However, the OP 2025 Volume 1 also contains the following policy: 4.4.5.8 *That Privately Owned Public Spaces may be eligible for parkland dedication credit toward satisfying the parkland dedication requirements for a Development or Redevelopment, subject to meeting all requirements established in Sections 4.4.3.2 and 4.4.4.8 of this Plan*	Section 4.4.4.1 categorizes 'Privately Owned Public Spaces' as an 'Open Space Typology' which may be publicly or privately owned, over and above parkland dedication. 4.4.6.8 *That Privately Owned Public Spaces may be eligible for parkland dedication credits toward 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.*	These policies are contradictory in nature, Policy 4.4.4.1 states that POPS are over and above parkland dedication whereas Policy 4.4.6.8 states that POPS may be eligible towards parkland dedication. These policies should defer to legislative requirements regarding parkland dedication, which currently does allow for Privately Owned Public Spaces to be granted credit toward satisfying parkland dedication requirements.

W7SP

The following table provides the outstanding commentary that was previously submitted from the W7LOG on the Draft #5 of the W7SP, the response from City staff in the New W7SP, and our recommendations.

Draft #5 W7SP Comment	New W7SP City Response	Recommendation
Section 2.2 of the W7SP contain policies for the Growth Threshold, Development Caps by Quadrant, ad Implementation/Phasing for the Weston 7. Section 2.2.a identifies a Growth Threshold of up to 26,000 people and jobs combined - a maximum of 16,000 people and 10,000 jobs to 2041 and Table 1, Estimated Development Caps by Quadrant - 26,000 People and Jobs Combined, forecasts 4,316 people and 2,697 jobs in the North-West Quadrant. This is significant reduction in the Growth Threshold for the W7SP area from 54,000 People and Jobs Combined and forecasted 11,210 people and 3,610	No change.	To revert to the Draft #3 of the W7SP Growth Threshold and Development Caps by Quadrant, or implement a series of growth thresholds as was incorporated in the VMC Secondary Plan, or tie growth thresholds to infrastructure delivery as established in the Yonge Steeles Corridor Secondary Plan. It is our opinion that the reduced growth forecast is contradictory to the role and vision of the Provincial Planning Statement ("PPS")

jobs in the North-West Quadrant from Draft #3 of the W7SP.		which specifically highlights that Official Plans are to look towards long-term planning. It is our opinion that this reduction does not demonstrate long-term planning as Weston 7, an area with that contains two PMTSAs, continues to build out that a significant increase of population is required to support non-residential uses. It is also noted that these forecasts do not reflect the existing non-residential uses within the W7SP which will likely continue to operate for some time given the low growth threshold.
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.	5.2.3 *General Development Policies* b) *Stand-alone, non-residential buildings are permitted within the Mixed-Use I designation. Stand-alone residential buildings are prohibited. All development applications within the Mixed-Use I designation shall include a minimum of 15% of its total Gross Floor Area as non-residential land uses.*	Requiring too large a quantity of non-residential space within a mixed-use area can lead to empty non-residential space that detracts from the vibrancy and viability of the W7SP. It is our opinion that this policy is too prescriptive and should be reassessed and incorporated into the Zoning By-law.

Thank you for the opportunity to comment. If you have any questions, do not hesitate to contact our office.

Sincerely,

MHBC

Oz Kemal, BES, MCIP, RPP
President

cc. V. Raso