INNOVATIVE PLANNING SOLUTIONS

planners • project managers • land development

January 30, 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

Dear Minister Flack:

Re: Letter Submission by MCN (VAUGHAN) INC. c/o IPS
In Response to MMAH ERO for Vaughan Official Plan 2025 (By-law 241-2025)
ERO Number: 025-1420 – MMAH & Reference Number: 19-OP-246866
12100 Weston Road (SW Corner of King-Vaughan Road and Weston Road)
Block 42
City of Vaughan

Innovative Planning Solutions Inc. ('IPS') is the planning consultant for the landowners of 12100 Weston Road (herein referred to as the 'Subject Lands').

The Subject Lands are currently farmed with planned for urban development. They are located at the southwest corner of Weston Road and King-Vaughan Road in Block 42 and legally described as: **PT E1/4 LT 35 CON 6 VAUGHAN; PT LT 34 CON 6 VAUGHAN PT 1, 65R36306 CITY OF VAUGHAN**.

Figure 1 displays the Subject Lands, and Figure 2, Highway 413's preliminary design considerations at the southern and eastern edges of the Subject Lands.

This correspondence constitutes a formal submission to the Ministry of Municipal Affairs and Housing ('MMAH') on Council-endorsed Vaughan Official Plan 2025 ('VOP 2025').

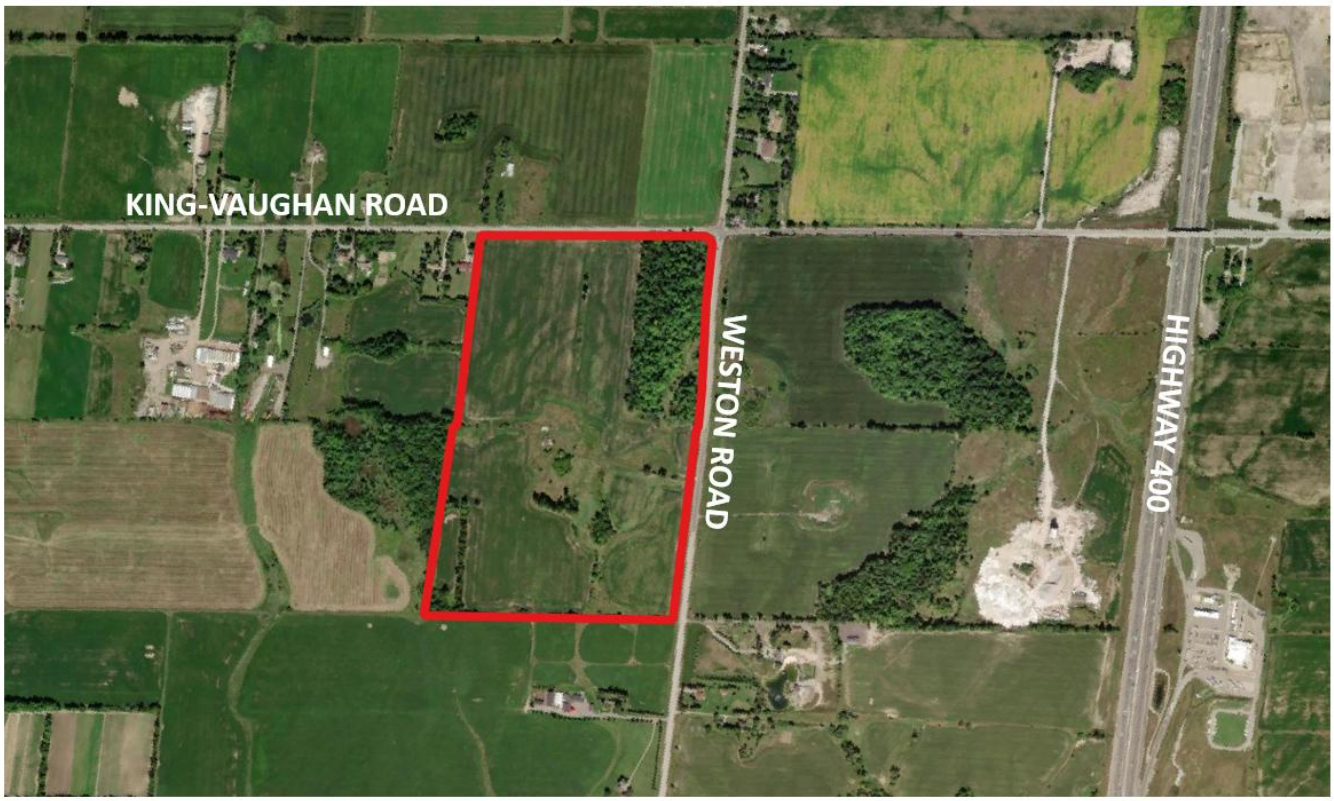


FIGURE 1 – AERIAL PHOTOGRAPH OF THE SUBJECT LANDS

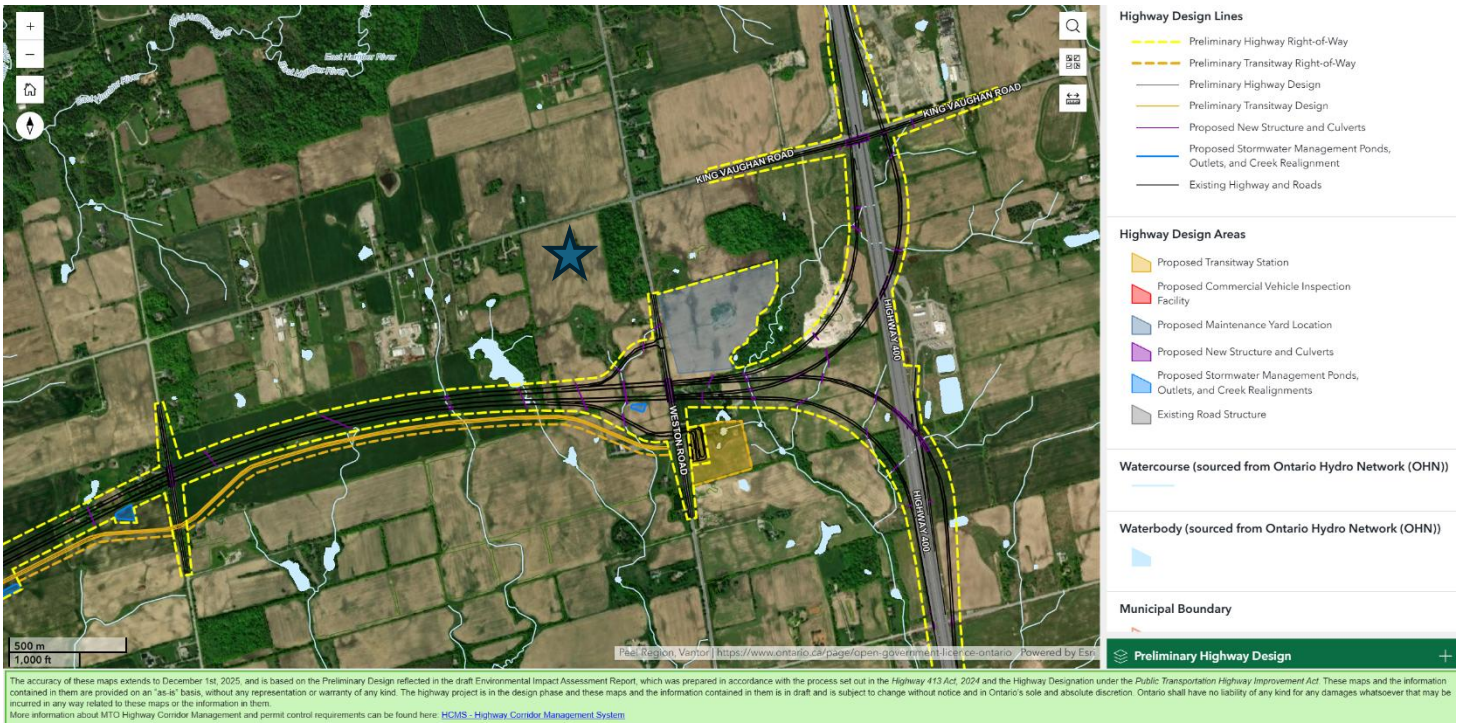


FIGURE 2 – HIGHWAY 413 PRELIMINARY DESIGN AND VICINITY OF KING-VAUGHAN ROAD & WESTON ROAD

REQUEST OF MMAH

Based on our review of the Provincial Planning Statement, 2024, and the Council-endorsed Vaughan Official Plan 2025 (VOP 2025), it is respectfully requested that the Ministry of Municipal Affairs and Housing (MMAH) consider the following targeted refinements to VOP 2025 to ensure the Plan functions as an implementation-ready growth management framework for the Subject Lands and the broader Highway 413 / King-Vaughan Road corridor:

1. **Schedule 13 – Land Use Designations**

- Remove the *Prime Agriculture* designation from the portion of the Subject Lands located within the *Urban Boundary*; and,
- Apply an interim "Lands Subject to Secondary Plans / Area Specific Plans" designation consistent with the identification of the lands within the North-Central Vaughan Secondary Plan Area on Schedule 14A, until such time as the Secondary Plan establishes refined and policy-aligned land use designations.

2. **Schedules 1 and 1A – Urban Structure and Urban Area**

- Modify the Urban Structure and Urban Area framework to provide Community Area permissions along King-Vaughan Road, recognizing its arterial and corridor function; and,
- Concentrate *Employment Area* within approximately 210 metres of the Highway 413 corridor, where proximity to goods movement infrastructure and regional access can be maximized (Refer to Appendix 1).

3. **Schedule 1B – Strategic Growth Areas**

- Consider applying the *Strategic Growth Area* corridor hierarchy to King-Vaughan Road and Weston Road, through identification as a Future Primary Corridor or Future Local Corridor; and,
- Identify the planned Highway 413 transitway stations as *Future Major Transit Station Areas*, consistent with VOP 2025's MTSA framework and PPS 2024's proactive transit planning direction.

4. **Proposed Highway 413 – Focused Analysis Area (2025)**

- Modify VOP 2025 to reflect the current Highway 413 planning framework, including but not limited to, reflecting the preliminary Highway Right-of-Way.

PLANNED LAND USE PLANNING FRAMEWORK UNDER COUNCIL-ENDORSED VOLUME 1 OF VOP 2025

The Council-endorsed Volume 1 of VOP 2025 establishes a revised City-wide growth management and land use framework that applies to the Subject Lands through a combination of urban structure designations, land use schedules, and policy overlays.

This section provides an overview of the Council-endorsed land use planning framework assigned to the Subject Lands. Refer to the Appendix for the VOP 2025 Schedule overlays.

Schedule 1 – Urban Structure

Under Schedule 1 – Urban Structure, the Subject Lands are identified as follows:

- They are partially located within the *Urban Boundary*, with lands inside the *Urban Boundary* designated *Employment Areas*, and lands outside the *Urban Boundary* designated *Natural Areas and Agriculture* associated with the Greenbelt Plan Area. They are also subject to the Highway 413 *Focused Analysis Area (2025)* overlay.

Schedule 1A – Urban Area

Schedule 1A – Urban Area establishes the following settlement area framework for the Subject Lands:

- The portions within the *Urban Boundary* are identified as *Designated Greenfield Area* with a *New Employment Area* overlay. Portions of the Subject Lands located outside the *Urban Boundary* are not subject to Schedule 1A.

Schedule 1B – Strategic Growth Areas

Schedule 1B – Strategic Growth Areas does not assign a City of Vaughan *strategic growth area* designation to the Subject Lands, as the Subject Lands are considered *designated growth areas* in PPS 2024.

The Subject Lands and surrounding area are not currently served by higher-order transit; however, they are anticipated to benefit from planned transitway and higher-order bus rapid transit associated with the Highway 413 corridor. Schedules under Schedule 1B related to Protected Major Transit Station Areas (PMTSAs) also do not yet reflect this planned and forthcoming transit infrastructure in proximity to the Subject Lands.

Schedule 1D – Agricultural System

Schedule 1D – Agricultural System only applies to the eastern portion of Parcel 2, designating those lands as *Rural Lands* within the *Greenbelt Plan Area*.

This schedule should be reviewed in conjunction with Schedule 13 in VOP 2025. Given the lands' *designated growth area* and *settlement area* considerations under PPS 2024, it is our opinion that agricultural system designations should not be afforded to the Subject Lands. We are understanding of the overarching provincial legislation and policies governing the Greenbelt Plan Area components of the Subject Lands.

Schedule 2 – Natural Heritage Network

Schedule 2 – Natural Heritage Network applies to portions of the Subject Lands, including:

- the eastern portion of located outside the *Urban Boundary*, designated *Greenbelt Plan Area, Natural Heritage Network – Core Features, Woodlands, and Area to be Determined Through Future Studies*.

Schedule 9A – Street Classification

Schedule 9A – Street Classification identifies:

- King-Vaughan Road and Weston Road as *York Regional Arterial Road*;
- a planned *Employment Minor Collector* street network (24-metre right-of-way), currently under review, south of King-Vaughan Road between Jane Street and Weston Road; and,

- Pine Valley Drive as a *Natural Arterial Road* with a planned right-of-way of 36 metres.

Schedule 13 – Land Use Designations

Under Schedule 13 – Land Use Designations:

- The Subject Lands are designated in VOP 2025 as *Agricultural Area* as *Natural Areas* with a *New Community Area and New Employment Area* overlay for the lands the *Urban Boundary*; and,
- *Rural and Natural Areas* for the eastern portion of the lands located within the *Greenbelt Plan Area*.

Schedule 14A – Areas Subject to Secondary Plans

Schedule 14A – Areas Subject to Secondary Plans identifies the Subject Lands within the *Required Secondary Areas* of the City, specifically, future *North-Central Vaughan* Secondary Plan.

Preliminary Response to VOP 2025 Schedules

In our view, despite its *designated growth areas* categorization under PPS 2024, Schedule 13 in Council-endorsed VOP 2025 applies the *Prime Agriculture* designation to the Subject Lands. We urge Staff to reconsider the planned context of the Subject Lands within the Urban Area / Urban Boundary, its planned urbanization as a *Designated Greenfield Area*, and future *built-up area* considerations.

It is our opinion that similar to the other secondary plan areas in the City, currently in force via VOP 2010, that Schedule 13:

- remove the *Prime Agriculture* designation from Schedule 13 for the portion of lands within the Urban Boundary and reflect the *North-Central Vaughan Secondary Plan* area identified in Schedule 14A; and,

- that the *Lands Subject to Secondary Plans or Area Specific Plans* land use designation be applied in the interim until such time that the North-Vaughan Secondary Plan process results in more accurate and aligned land use designations for the Subject Lands.

PLANNING RATIONALE

This section of the letter provides an overview of our planning rationale contextualizing and justifying the request.

The Subject Lands and VOP 2025's 2051 Vision

The City of Vaughan's 2051 Vision embedded in VOP 2025 as the city's guiding land use planning policy document delivers direction from Council on meeting the needs and values of its municipality leading into the planning horizon of 2051.

Section 2.1.2 *Vaughan's Evolution: Key Planning Objectives* provides for the primary objectives of VOP 2025, including but not limited to:

- Growth management and intensification within the Built-Up Area and identified intensification areas;
- Strategic Growth Areas as the primary locations for accommodating intensification and redevelopment;
- Compact, higher-density, and transit-supportive urban form;
- Creation of Complete Communities that support transit use and Active Transportation;
- Transit-supportive densities and mixed-use development along major transit corridors;
- Promotion of walking, cycling, and Active Transportation through compact, walkable community design and supporting infrastructure;
- Provision of a diverse range of housing options across tenure, affordability, size, and built form;
- Coordinated and phased development aligned with the delivery of municipal and regional infrastructure;
- Inclusive and accessible community planning and urban design; and,

- Comprehensive financial management that integrates economic, environmental, and social considerations.

The planned and anticipated urbanization on the Subject Lands exhibit a high-degree of alignment with these objectives, by virtue of their strategic location, scale, and interface with existing and planed infrastructure, and their capacity to accommodate compact, transit-supportive mixed-use development that contributes to intensification, complete and sustainable community, and coordinated growth management outcomes to deliver homes and jobs to the planning horizon of 2051.

Application of the Planned Corridor-based Framework and Alignment with PPS 2024 and VOP 2025

The conceptual land use structure illustrated on the attached plan for 12100 Weston Road provides a practical and policy-consistent framework for implementing the City's long-term growth objectives for the Subject Lands. The plan demonstrates how *Designated Greenfield Area* lands within the Urban Boundary can be structured to support compact, mixed-use development, employment protection and transition, environmental stewardship, and future transit integration in a coordinated manner.

Designated Growth Areas, Corridor Planning and the Employment-Community Areas Interface

The PPS 2024 establishes a clear and integrated policy framework that settlement areas and designated growth areas are to be the focus of growth and development (PPS 2024, s. 2.3.1.1). Within these areas, land use patterns are to be planned at densities and with a mix of uses that:

- efficiently use land and resources;
- optimize existing and planned infrastructure and public service facilities;
- support active transportation;
- are transit-supportive, as appropriate; and
- are freight-supportive (PPS 2024, s. 2.3.1.2).

PPS 2024 does not limit this direction to locations currently served by higher-order transit. Rather, it explicitly supports planning for growth in advance of transit and infrastructure delivery, provided that development is coordinated through appropriate phasing and servicing strategies (PPS 2024, ss. 2.1.3, 2.3.1.6, and 6.2).

PPS 2024 encourages municipalities to establish density targets for designated growth areas based on local conditions, and specifically encourages large and fast-growing municipalities to plan for 50 residents and jobs per gross hectare in such areas (PPS 2024, s. 2.3.1.5). It further encourages the use of phasing policies to ensure development proceeds in an orderly manner and aligns with the timely provision of infrastructure and public service facilities (PPS 2024, s. 2.3.1.6).

In this context, the continued application of land use designations within the Urban Boundary that signal long-term protection or deferral such as *Prime Agriculture*, runs counter to the PPS 2024 expectation that designated growth areas be planned as implementation-ready urban lands, subject to comprehensive planning rather than indefinite constraint.

PPS 2024 places particular emphasis on the protection and planned function of transportation and infrastructure corridors. Planning authorities are required to:

- plan for and protect corridors and rights-of-way for transportation and transit facilities to meet current and projected needs; and

- ensure that development adjacent to such corridors is compatible with, and supportive of, the long-term purpose of the corridor and does not preclude or negatively affect its future use (PPS 2024, ss. 3.2.1.1 and 3.3.1).

The Highway 413 corridor clearly meets the PPS definition of a planned transportation and infrastructure corridor, and the application of the *Highway 413 Focused Analysis Area* overlay reflects this policy direction. However, PPS 2024 does not support a passive or restrictive approach to land use planning along such corridors. Rather, it anticipates proactive corridor-based planning, including the integration of land use structure, transition areas, and future transit-supportive development patterns in advance of infrastructure delivery.

Employment Areas and the Community Interface

PPS 2024 provides a nuanced and performance-based framework for managing the interface between Employment Areas and non-employment uses:

- Within Employment Areas, planning authorities are required to designate and preserve lands for employment uses and ensure that sensitive land uses are not permitted in a manner that would compromise the long-term viability of employment functions (PPS 2024, s. 2.8.1.1);

- At the same time, PPS 2024 expressly recognizes that development outside Employment Areas but within proximity is not prohibited. Policy 2.8.1.3 provides that on lands within 300 metres of Employment Areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of existing or planned employment uses.

The above-noted policy is critical. It establishes that compatibility at the Employment–Community interface is to be addressed through evidence-based assessment and mitigation, not through categorical land use exclusion or rigid separation at the Official Plan schedule level. PPS 2024 thereby anticipates a range of potential outcomes, residential, office, mixed-use, and employment-supportive uses, provided that long-term employment viability can be demonstrated.

REQUEST AND CONCLUSION

Requests

Based on our review of the Provincial Planning Statement, 2024, and the Council-endorsed Vaughan Official Plan 2025 (Volume 1), it is respectfully requested that the Ministry of Municipal Affairs and Housing consider the following targeted refinements to VOP 2025 to ensure the Plan functions as an implementation-ready growth management framework for the Subject Lands and the broader Highway 413 / King-Vaughan Road corridor:

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2. Schedules 1 and 1A – Urban Structure and Urban Area

- Modify the Urban Structure and Urban Area framework to provide Community Area permissions along King-Vaughan Road, recognizing its arterial and corridor function; and,
- Concentrate Employment Area permissions within approximately 210 metres of the Highway 413 corridor, where proximity to goods movement infrastructure and regional access can be maximized.

3. Schedule 1B – Strategic Growth Areas

- Consider applying the Strategic Growth Area corridor hierarchy to King-Vaughan Road and Weston Road, through identification as a Primary Corridor or Local Corridor; and,
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5. Proposed Highway 413 – Focused Analysis Area (2025)

- Modify VOP 2025 to reflect the current Highway 413 planning framework, including but not limited to, reflecting the preliminary Highway Right-of-Way.

Conclusion

When read conjunctively, PPS 2024 and VOP 2025 establish a clear and consistent planning framework that directs growth to settlement areas and designated growth areas, requires proactive corridor-based planning, protects employment lands while enabling compatible transitions, and anticipates future transit-supportive development in advance of infrastructure delivery.

The Subject Lands are designated within the Urban Boundary, identified as Designated Greenfield Area, and located within the Highway 413 Focused Analysis Area, placing them squarely within this framework. VOP 2025 further requires that such lands be

planned comprehensively, achieve minimum density targets, and proceed through secondary planning to resolve land use structure, transition, phasing, and infrastructure coordination.

In this context, the continued application of Prime Agriculture designations within the Urban Boundary, and the absence of corridor and future transit recognition on the applicable schedules, represent implementation-level inconsistencies rather than expressions of Council's long-term growth strategy. These conditions risk constraining the Secondary Plan process and undermining the Plan's ability to deliver compact, transit-supportive, and employment-supportive development consistent with both provincial and municipal policy.

The requested refinements do not introduce new policy direction. Rather, they represent targeted, policy-consistent adjustments intended to align VOP 2025's schedules with:

- PPS 2024's direction for designated growth areas, corridor planning, and employment compatibility;
- VOP 2025's Urban Structure hierarchy, corridor transition policies, and MTSA framework; and,
- the City's stated 2051 vision for complete, connected, and economically resilient communities.

For these reasons, we respectfully submit that the requested modifications are appropriate, justified, and necessary to ensure that VOP 2025 gives full and consistent effect to provincial policy and provides a clear, forward-looking framework for the planning and development of the Subject Lands.

Respectfully submitted,
Innovative Planning Solutions



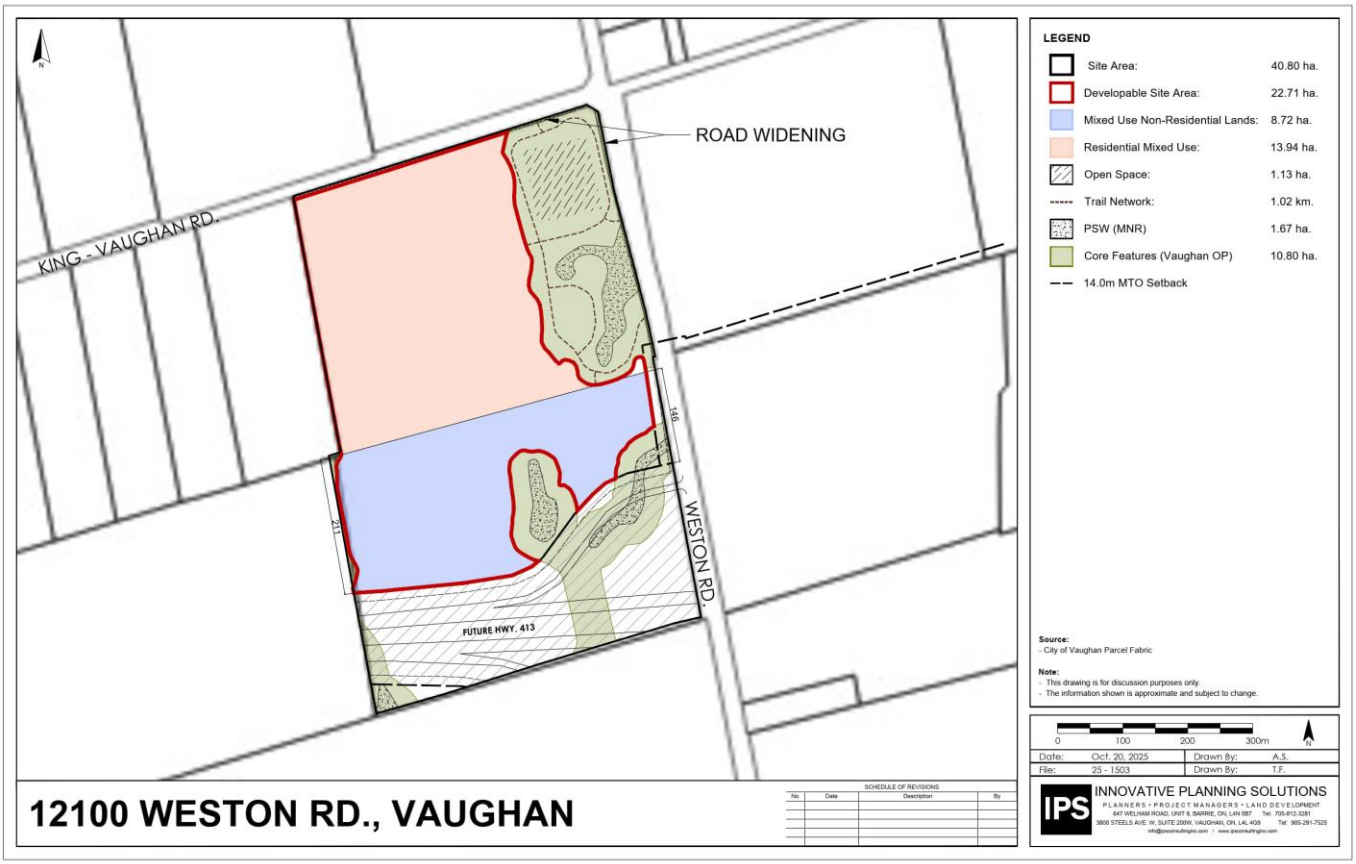
Mathew Halo, BURPL., RPP
Associate



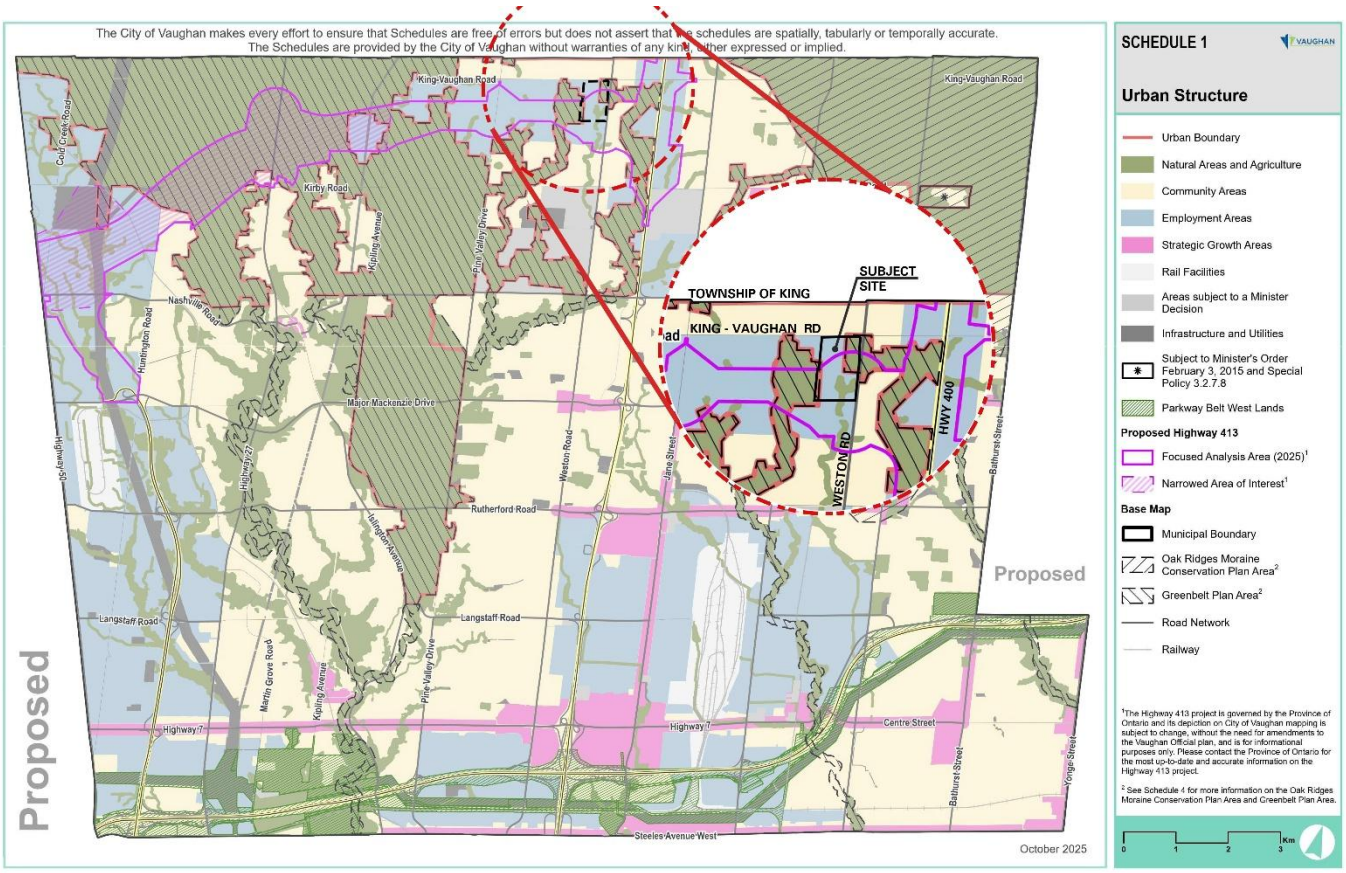
Kevin Bechard, BES, M.Sc., RPP
Senior Associate

c. Clients

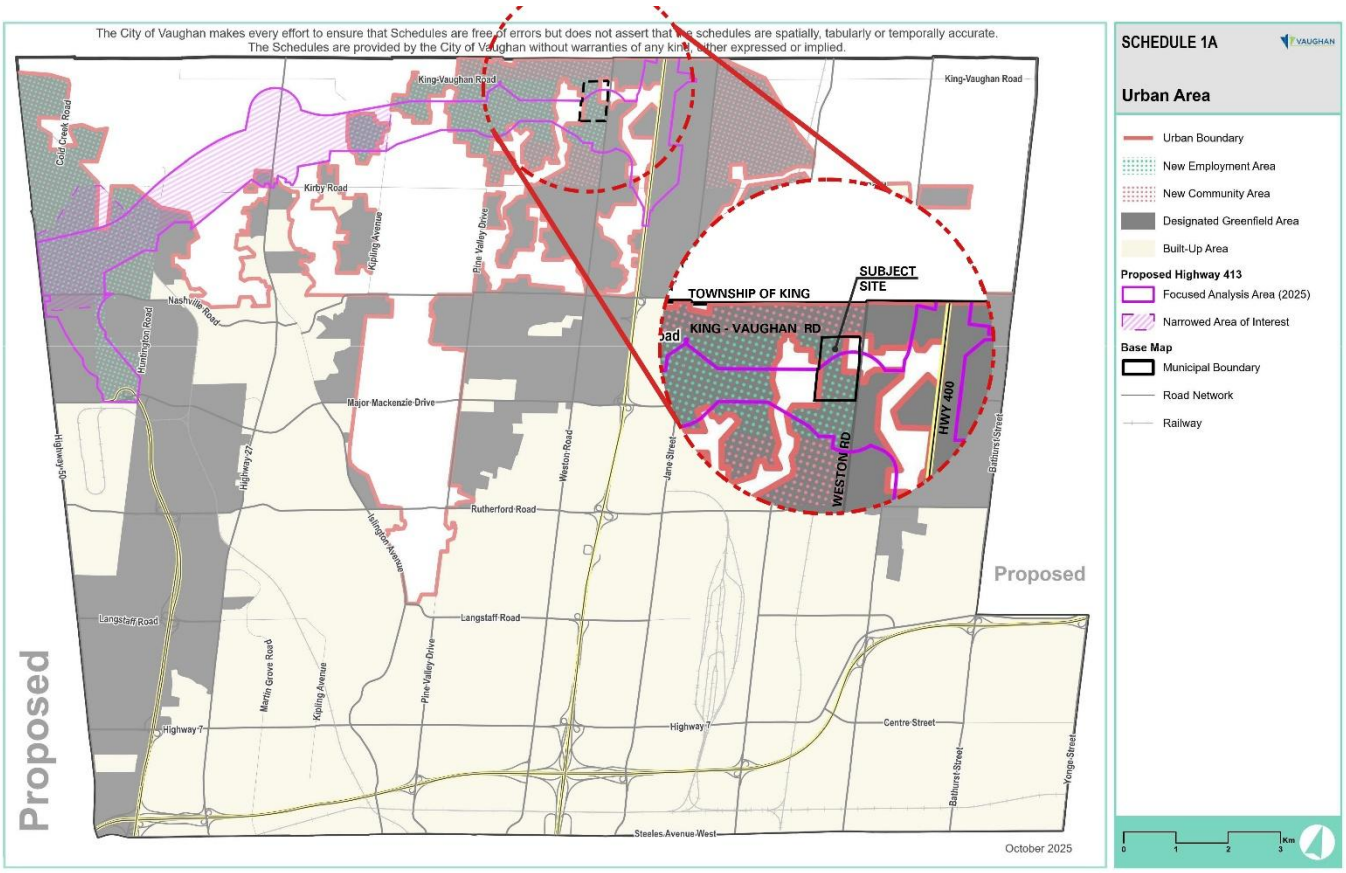
APPENDICES



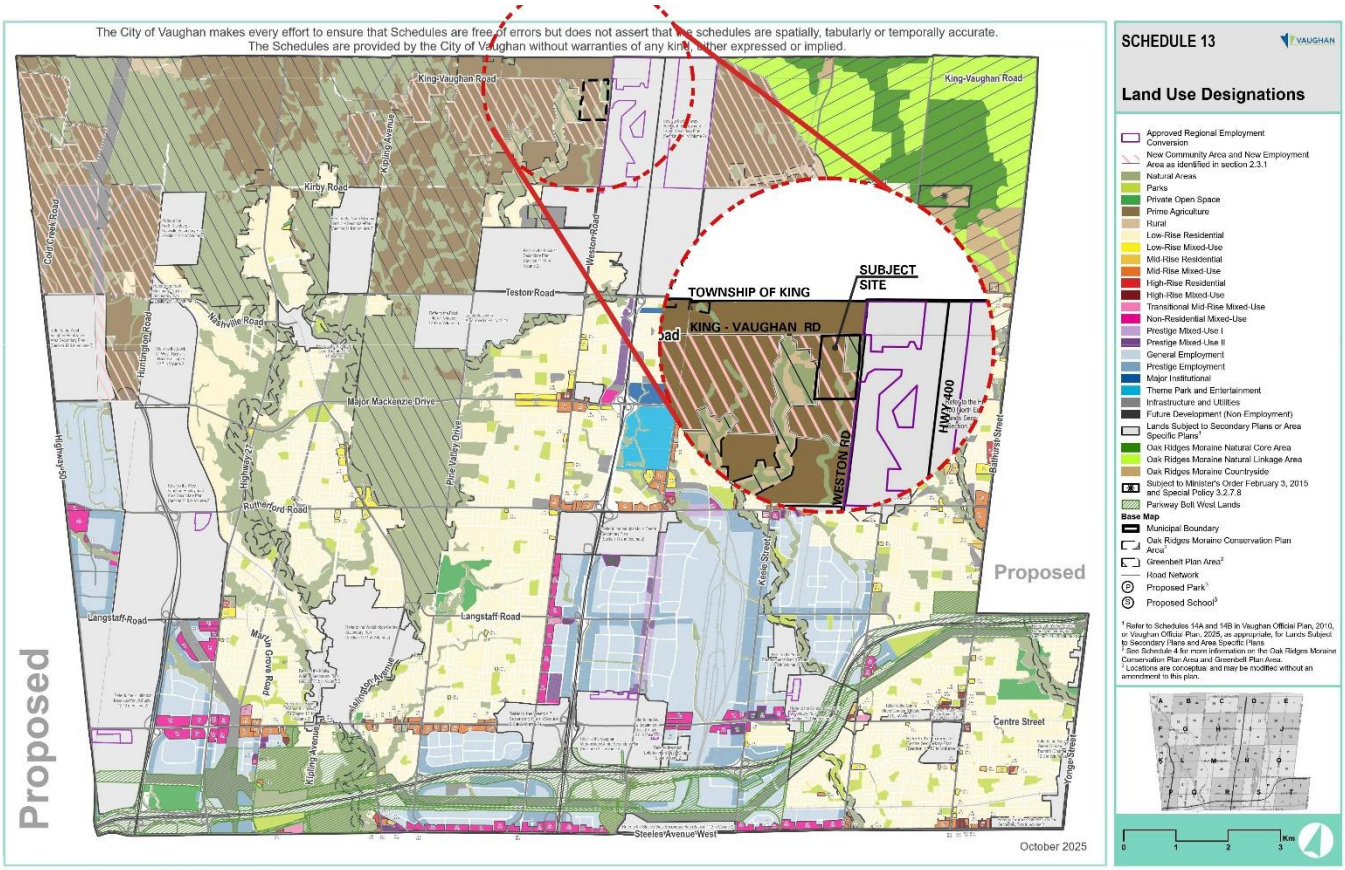
APPENDIX 1 – PROPOSED LAND USES FOR SUBJECT LANDS



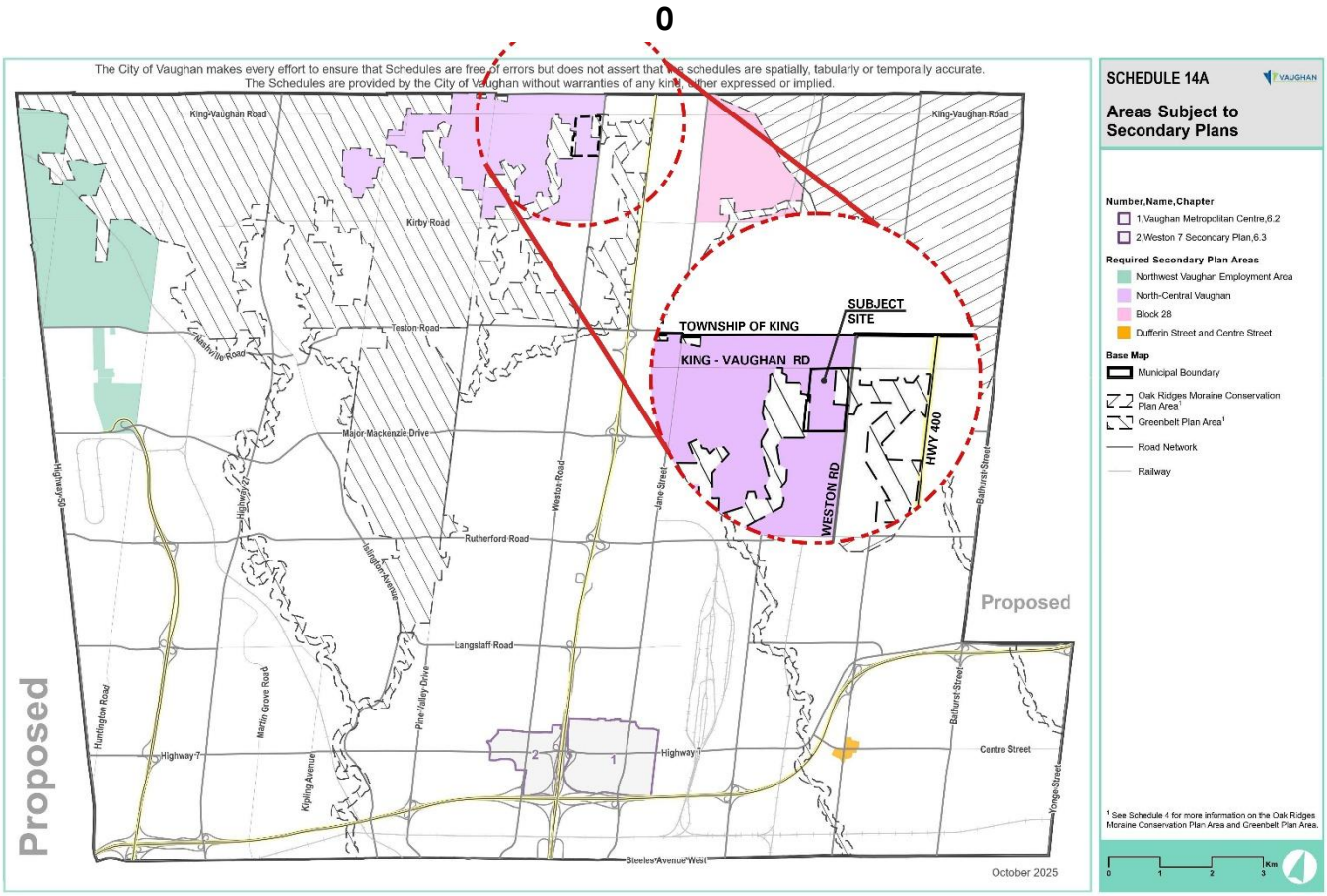
APPENDIX 2 – SUBJECT LANDS AND VOP 2025 SCHEDULE 1



APPENDIX 3 – SUBJECT LANDS AND VOP 2025 SCHEDULE 1A



APPENDNIX 4 – SUBJECT LANDS AND VOP 2025 SCHEDULE 13



APPENDIX 5 – SUBJECT LANDS AND VOP 2025 SCHEDULE 14A