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KLM File: P-3569

February 1, 2026

Ministry of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay St
Toronto, Ontario
M7A 2J3

Attention: Hon. Rob Flack, Minister of Municipal Affairs and Housing

Re: ERO 025-1420 – Approval of Vaughan Official Plan 2025
Lormel Homes (Cityview, Kirbywest Ltd. and Lormel Developments Ltd.)

KLM Planning Partners Inc. ("KLM") is the land use planning consultant for Lormel Homes (Cityview, Kirbywest Ltd. and Lormel Developments Ltd.) (the "Client"). Our Client owns a series of landholdings in the City of Vaughan ("City"), two of which are described as follows:

> Parcel 1 – Cityview Boulevard – lands municipally known as 311, 321, 331 and 0 (northeast corner of Cityview Blvd and Canada Drive) Cityview Blvd., Vaughan which are located along Cityview Blvd. between Major Mackenzie Drive West and Teston Road.
>
> Parcel 2 – Kirbywest Ltd. - Block 41 – lands legally known as Part of Lot 30, Concession 6, City of Vaughan. Which are generally located southwest of the intersection of Kirby Road and Weston Road.

The above-noted properties are collectively referred to as the "Subject Lands" or individually as Parcels 1 and 2 respectively.

Our Client has been actively involved throughout the Vaughan Official Plan 2025 ("VOP 2025") process, providing feedback and engaging with the City individually and through landowner group communications. Our most recent correspondence is provided as Attachment 1. We appreciate the changes the City has already made to VOP 2025 based on our previous engagement.

Through your consideration of the VOP 2025 for approval, we respectfully request the following modifications to support the development of new housing, the creation of complete communities, and a streamlined development approvals process in the City as we look ahead to 2051.

1. Requested Modifications to the Subject Lands

a) Parcel 1 – Redesignation to "Mid-Rise Mixed-Use"

Minister Request: Redesignate Parcel 1, located on the east side of Cityview Boulevard, between Major Mackenzie Drive and Teston Road and more specifically north of the Cityview Pond, from "Prestige Mixed-Use II" to "Mid-Rise Mixed-Use" on Schedule 13 (Land Use Designations) of the VOP 2025, and introduce an area-specific policy restricting residential uses directly abutting Highway 400.

Rationale: Through discussions with City staff and ongoing participation in the VOP 2025 process, the Parcel 1 lands were recognized as "Community Area" on Schedule 1: Urban Structure and designated "Prestige Mixed Use II" on Schedule 13: Land Use, which permits a wide range of employment, office, retail uses including personal and service uses, hotels, and cultural and entertainment uses, but does not permit residential uses. Parcel 1 is located along a Minor Collector Road, in proximity to existing residential uses on the west side of Cityview Boulevard and is currently development predominantly with office and commercial uses which are no longer considered to be an "Area of Employment" as updated by the Provincial Planning Statement 2024 ("PPS 2024").

Based on the above, the introduction of a "Mid-Rise Mixed Use" designation on Schedule 13 of VOP 2025 would support a wide range of uses including residential uses on these lands, providing opportunities for a broader range of housing choice in the community. This would directly support City and Provincial policy objectives to provide a greater range and mix of uses and increase housing supply. A redesignation from "Prestige Mixed Use II" to "Mid-Rise Mixed Use" would still require a rezoning application to facilitate a change in use for Parcel 1 which would necessitate full studies to confirm the appropriateness of a new use and potential impacts. Public Consultation through the rezoning process as required by the Planning Act would facilitate public engagement on any future change in use as well. There is existing services in the area to support growth, there are no environmental features that may be impacted and the lands are located within the urban area and can support a more intensive form of development and a broader range of housing choice.

b) Parcel 2 – Identify a Strategic Growth Area along Weston Road

Minister Request: Identify Weston Road from Major Mackenzie Drive West to just north of Kirby Road as a "Strategic Growth Area" on Schedule 1: Urban Structure and "Local Corridor" on Schedule 1B: Strategic Growth Areas.

Rationale: VOP 2025 is intended to manage growth to 2051, including in its secondary plan areas in the north such as Block 41, which includes Parcel 2. Identifying this section of Weston Road as a "Strategic Growth Area" and "Local Corridor" will support the positive integration of future community areas in north Vaughan with the rest of the City including the direction to consider higher order transit along this corridor. Further, this approach will provide a supportive policy framework for encouraging intensification along this corridor, which will ultimately support higher order transit connections to north Vaughan.

2. Requested General Policy Modifications

In addition to the above, we request the following general policy modifications that will streamline the development process by reducing duplication between the VOP 2025 and other policy and planning instruments and providing greater clarity for community members and the development industry as they seek to build complete communities in the City.

a) Remove Policy 5.3.1.2.2 c) as it limits the potential for appropriate expansion of legally existing uses

   Policy 5.3.1.2.2 provides the framework for recognizing existing uses, and Policy 5.3.1.2.2 c) specifically provides that an existing use may not expand beyond the boundaries of the lands containing said use, as new property cannot be added. This policy discourages existing and legally permitted uses to expand regardless of property ownership, even when it can be demonstrated through the balance of the policies in 5.3.1.2.2 that the expansion is appropriate and does not compromise the intent of the VOP 2025. This policy should be removed.

b) Add clarity to Section 1.3.2 regarding transition policies

   Policy 1.3.2.4 outlines when an application submitted prior to the adoption of VOP 2025 will be subject to the Vaughan Official Plan, 2010 ("VOP 2010").

   Section 1.3.2 deals with transition regarding the introduction of the new OP. Policy 1.4.2.1 provides that Volume 1 of VOP 2010 will remain in force for only the purposes of interpretation and implementation of Volume 2 of VOP 2010. This language is very vague and not helpful regarding implementation. Policies 1.3.2.4 consider a trigger date related to when an application is deemed complete. We respectfully request this be changed to when development applications are submitted to the City, not when they are deemed complete. The reason for this request is related to the fact that the Planning Act was changed to eliminate the need for pre-consultation. Without pre-consultation, the determination of a complete application is not clearly understood. We recommend the requirement of a complete application be changed to the submission of a development application, such that the review of development applications may be considered in a transparent and predictable manner.

c) Revise policy 2.5.1.2 (f) to broadly permit gentle intensification in Large Lot Neighbourhoods

   Policy 2.5.1.2 (f) requires a replacement building in Established Large-Lot Neighbourhoods to be the same type, except semi-detached and townhouse forms are

permitted for lots located on arterial streets. This policy does not allow for the comprehensive consideration of appropriate gentle intensification in a manner that supports City and Provincial objectives related to increasing housing supply, and should be revised to permit opportunities for infill development more broadly.

d) Revise policy 4.3.3.13 to provide more general direction with respect to parking and loading areas

   The language within Policy 4.3.3.13 be softened to identify that parking ramps, loading areas and services should "generally" be incorporated into the building form of Mid-Rise Buildings and High-Rise Buildings. Site design characteristics should be assessed on a site-by-site basis through the site plan process and not be subject to unnecessarily apply for an Official Plan Amendment.

We appreciate the opportunity to provide this feedback on VOP 2025 prior to Ministerial approval, and we look forward to continuing to work with the City and Province to support growth in Vaughan. Should you have any questions about the above, please contact us.

Yours truly,
KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan BURPl, MCIP, RPP
Partner

Attachment 1: Letter from KLM Planning Partners Inc. to Hon. Mayor Del Duca and Members of City of Vaughan Council dated June 3, 2025, re: Committee of the Whole (Public Hearing) June 4, 2025, item #4.10, Forward Vaughan – Vaughan Official Plan Review, Official Plan Draft – May 2025.

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File: P-3569

June 3, 2025

City of Vaughan
2141 Major Mackenzie Drive
Vaughan, ON
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via Email: clerks@vaughan.ca & oprmanager@vaughan.ca

Attention: **Hon. Mayor Del Duca and Members of Council**

Re: **Committee of the Whole (Public Hearing) June 4, 2025, Item #4.10**
Forward Vaughan – Vaughan Official Plan Review
Official Plan Draft – May 2025

KLM Planning Partners Inc. ("**KLM**") is the land use planning consultant for Lormel Homes (Cityview, Kirbywest Ltd. and Lormel Developments Ltd.) (the "**Client**"). Our client owns a series of landholdings in the City of Vaughan, some of which are described as follows:

Parcel 1 – Cityview Boulevard – lands municipally known as 311, 321, 331 and 0 (northeast corner of Cityview Blvd and Canada Drive) Cityview Blvd., Vaughan which are located along Cityview Blvd. between Major Mackenzie Drive West and Teston Road.

Parcel 2 – Kirbywest Ltd. - Block 41 – lands legally known as Part of Lot 30, Concession 6, City of Vaughan. Which are generally located southwest of the intersection of Kirby Road and Weston Road.

Parcel 3 – Lormel Developments Ltd – Block 27 – lands legally known as Part of Lots 28 and 29 Concession 4, City of Vaughan. Generally located east of Jane Street, north of Teston Road.

The above-noted properties are located in the City of Vaughan (the "**City**"), Region of York (the "**Region**") and are collectively referred to as the "**Subject Lands**" or individually as Parcels 1, 2, and 3, respectively.

Our requests:

1. Redesignation of the Parcel 1 lands to 'Transitional Mid-Rise Mixed-Use' designation given the proximity of the residential areas to the west and given the existing uses on these lands and in the surrounding area includes retail stores, community uses, daycares, offices and recreational centres which are not considered employment uses. This approach is consistent with the fact that the City has identified these employments lands differently that other employment lands in the City with the "Lands Subject to Future Non-Residential Site-Specific Policy" overlay designation.

2. Vaughan should consider a Strategic Growth Areas along Weston Road from Major Mackenzie Drive West to just north of Kirby Road to support a positive integration of areas in north Vaughan to the rest of the City. The identification of Weston Road as a Strategic Growth Corridor will support the policy framework to encourage intensification along this corridor which will ultimately support higher order transit connections to north Vaughan.

3. To ensure fairness, transparency and continuity of planning undertaken under VOP 2010, we kindly request Council consider including policies to ensure the lands subject to the Block 27 Secondary Plan under VOP 2010 shall continue to be in force and effect and the VOP 2010 (Volume 1 and 2) policies prevails over any part of the new VOP 2025.

4. To support Vaughan's ability to respond to market shifts, demographic changes or innovation in architecture, public spaces and community building, we request Council considers our request to revise the policies identified in this letter to support the timely delivery of housing and infrastructure.

General Comments

In June 2024, the City released the Draft Comprehensive Official Plan Amendment (the "**Draft OPA**") for public comment with initial comments requested by July 31, 2024, with a statutory public open house and Statutory Public Meeting previously scheduled for October 2024. Following that preliminary release, the Ministry of Municipal Affairs and Housing released the final Provincial Planning Statement 2024 ("**PPS 2024**"), which delayed the next phase of the Official Plan Review ("**OPR**"). In May 2025, Vaughan released a new draft #5 of the Official Plan 2025 ("**VOP 2025**"), which is now considered to be a new Official Plan under Section 17 of the *Planning Act* instead of an update under Section 26 of the *Planning Act* given the broad changes to Provincial Policy.

On January 27, 2025, KLM attended the Public Open House with our client, and we had an opportunity to engage with the City's consulting team at WSP and City staff. We understand that the City of Vaughan began its OPR in 2014, but it has been significantly delayed due to many changes to Provincial Legislation which has occurred over the past several years including more recently the removal of the Region of York from having planning responsibilities. We understand this has fundamentally changed how the land use planning framework will move ahead in the City of Vaughan and other York Region municipalities.

KLM has had an opportunity to review the Draft #5 of the new VOP 2025 dated May 2025 with our client and we are pleased to provide the following high-level comments relative to some of the policies included therein.

The Forward Vaughan goal is to create a new Official Plan to implement the long-term vision for Vaughan, to the year 2051, through land use policies that direct density, housing supply, protection of environmental features and agricultural areas, to create a vibrant city for people to live, work and play. With the passage of 15 years between the adoption of VOP 2010 and this draft VOP 2025, the overall urban structure presented in Schedule 1 and the policies related should contain stronger policies to support the development of complete communities and in turn, the long-term planning growth of the City. For example, the planning framework continues to protect low-rise residential areas and focuses intensification along a few corridors in Vaughan. There are also opportunities to support the new community areas at the north end of Vaughan where there has been considerable density approved into the balance of the City.

Upon review, the City has lowered the population and employment forecasts in the VOP 2025 when compared with what was approved in VOP 2010. For example, Policy 2.1.1.1 in VOP 2010 stated the objective of the plan was to provide for land uses in Vaughan in order to accommodate a population of 416,600 people and 266,100 jobs by 2031 (see Figure 2 – VOP 2010 below).

Figure 2
York Region Population and Employment Forecast - Vaughan

	2006	2016	2021	2026	2031
Population	249,300	329,100	360,400	388,800	416,600
Employment	162,200	226,000	248,900	257,600	266,100

VOP 2025 has reduced the population and employment targets that previously existed in VOP 2010 for the years 2016, 2021 and 2031 but without providing a rationale for a reduction in these targets (see Table 2.1 – VOP 2025 below).

Table 2.1: Population and Employment Data and Forecasts for the City of Vaughan, 2016-2051

	2016	2021	2031	2041	2051
Population	315,700	333,100	398,300	478,900	575,900
Employment	222,200	243,700	280,600	315,800	354,300

It is clear that VOP 2025 is fundamentally based off VOP 2010 which has established the land-use planning framework which has supported the revised focus on intensification within the City and the push towards more complete communities. KLM has been involved in a number of exciting projects and has collaboratively worked alongside City Staff to facilitate intensification projects along the corridors over the past 15 years under the VOP 2010 planning framework.

In spite of the successes of VOP 2010, we believe there is a greater opportunity to allow for more intensification throughout the City, both within the low-rise residential communities and along corridors and existing and planned transit stations within the City in order to meet the required population projections. We believe the City in VOP 2025 should provide more opportunity for height and density that reflect the level of intensification being approved by Council and the Ontario Land Tribunal along corridors. For example, 12-storey buildings along Arterial Roads are appropriate and should be considered in VOP 2025 throughout Vaughan with massing and setbacks established through the already existing City-Wide Urban Design Guidelines.

Development of housing is a very complex process, and each application has its own unique challenges. However, a common denominator for each application is the local municipal Official Plan. In tandem, Zoning By-laws are the primary tool the City has available under the *Planning Act* to implement the policies of the Official Plan.

For example, to promote mid-rise buildings along an intensification corridor, Vaughan could pre-zone the lands to accommodate such built form and to implement the vision of the VOP 2025 to deliver housing and build complete communities in accordance with the policies of the Official Plan.

Detailed Comments

Below are comments in relation to our client's landholdings:

1. Parcel 1 is proposed to be designated Employment Area' on Schedule 1 – Urban Structure, and 'Prestige Employment'/'Lands Subject to Future Non-Residential Site-Specific Policy' on Schedule 13 – Land use Designations. We are unable to find any policy in VOP 2025 which speaks to the 'Lands Subject to Future Non-Residential Site-Specific Policy' as noted on Schedule 13. Furthermore, we believe there is merit in including these lands and all the lands between Cityview Blvd and Highway 400 within the Transitional Mid-Rise Mixed-Use designation given the proximity of the residential areas to the west and given the existing uses on these lands and in the surrounding area includes retail stores, community uses, daycares, offices and recreational centres which are not considered employment uses in accordance with recent amendments to the *Planning Act* and the Provincial Planning Statement 2024 ("**PPS**"). This approach is consistent with the fact that the City has identified these employments lands differently that other employment lands in the City with the "Lands Subject to Future Non-Residential Site-Specific Policy".

2. Parcel 2 is proposed to be designated 'Areas subject to a Ministers Decision" on Schedule 1 – Urban Structure and are noted as being subject to the Block 41 Secondary Plan (Section 11.14 in Volume 2) on Schedule 13 – Land Use. We note that a revised Volume 2 of the Vaughan Official Plan has not been released for public review. Parcel 2 is further designated as Low-Rise Residential, Mid-Rise Residential, and Mid-Rise Mixed-Use along Weston Road within the Block 41 Secondary Plan. The Mid-Rise Mixed-Use designation at the intersection of Weston Road and Kirby Road is consistent with the policy direction supporting Strategic Growth Areas identified on Schedule 1 – Urban Structure. In fact, we believe that Vaughan should consider a Strategic Growth Areas along Weston Road from Major Mackenzie Drive West to just north of Kirby Road to support a positive integration of areas in north Vaughan to the rest of the City. The identification of Weston Road as a Strategic Growth Corridor will support the policy framework to encourage intensification along this corridor which will ultimately support higher order transit connections to north Vaughan.

3. Parcel 3 is proposed to be designated "Community Areas" and "Natural Areas and Agriculture" on Schedule 1 – Urban Structure and are noted as being subject to the Block 27 Secondary Plan (Section 11.13 in Volume 2) on Schedule 13 – Land Use. A Block Plan application has been submitted for Block 27 and is currently under review. To ensure fairness, transparency and continuity of planning undertaken under VOP 2010, we kindly request Council consider including policies to ensure the lands subject to the Block 27 Secondary Plan under VOP 2010 shall continue to be in force and effect and the VOP 2010 (Volume 1 and 2) policies prevails over any part of the new VOP 2025. As alluded to earlier in this letter, development applications submitted under VOP 2010 should continue to be reviewed in accordance with VOP 2010 to reduce unnecessary procedural and policy barriers.

Below are some specific comments in relation to the proposed policies within the Draft VOP 2025:

1. Section 1.4.1 provides the general policies which apply to the entire City regarding the implementation of the new OP. Policy 1.4.1.7 provides the policy framework that deals with the recognition of existing uses. While the policies within this section remain generally the same as the policies within VOP 2010, Policy 1.4.1.7.c is new and provides that an existing use may not expand beyond the boundaries of the lands containing said use, as new property cannot be

added. This policy discourages existing and legally permitted uses to expand regardless of property ownership even when it can be demonstrated through the balance of the policies in Section 1.4.1.7 that the expansion is appropriate and does not compromise the intent of this plan. This policy should be removed. Furthermore, Policy 1.4.1.7 and Policy 5.1.3.22 are both related to existing uses but are slightly different in language. These policy sections should be combined for efficiency in implementation.

2. Section 1.4.2 deals with transition regarding the introduction of the new OP. Policy 1.4.2.1 provides that Volume 1 of VOP 2010 will remain in force for only the purposes of interpretation and implementation of Volume 2 of VOP 2010. This language is very vague and not helpful regarding implementation. Policies 1.4.2.4 to 1.4.2.5 consider a trigger date related to when an application is deemed complete. We respectfully request this be changed to when development applications are submitted to the City, not when they are deemed complete. The reason for this request is related to the fact that the *Planning Act* was changed to eliminate the need for pre-consultation. Without pre-consultation, the determination of a complete application is not clearly understood. We recommend the requirement of a complete application be changed to the submission of a development application, such that the review of development applications may be considered in a transparent and predictable manner.
3. Section 2.2.3.2 provides the framework for the types of residential uses permitted within Community Areas. We note that this includes single-detached, semi-detached and townhouses, but excludes low-rise and mid-rise apartment residential and mixed-use development. It is our opinion that low-rise and mid-rise and mixed-use development are compatible with the uses noted above, and that excluding these uses is inappropriate given the need for housing. Further, achievement of the 65 residents and jobs/hectare density target and 57% intensification within the built boundary will require the provision of higher density-built form than currently proposed in Draft VOP 2025. The inclusion of the built forms and land uses will better contribute to the establishment of complete communities by including a broad range of housing choice and by providing greater range of uses within the community.
4. Section 2.2.3.9 supports a broader range of building typologies but only along an Arterial Street or Major Collector Road. We respectfully request that low-rise and mid-rise apartment residential and commercial/residential mixed-use development be permitted within Community Areas supported by appropriate locational policies such as being located along Arterial Streets and both Major and Minor Collector Roads.
5. In many instances, prescriptive requirements associated with setbacks, unit sizes, building separation, location of parking etc. are provided throughout the Official Plan, which in our opinion are more appropriately defined in the implementing Zoning By-law and in most cases already exist in the City-Wide Urban Design Guidelines. Below are some examples of policies that would likely result in triggering the need for an Official Plan Amendment in support of development to implement the land uses envisioned by the Draft VOP 2025:

    a. Policy 2.5.1.1 restricts a replacement building in the community area to only be the same type. This does not allow for the consideration for appropriate gentle intensification.
    b. Policy 2.2.3.9.a) requires all new dwelling units to front a public road without consideration for frontage on a private road/street which is often the case within infill development.
    c. Policy 4.3.3.5 requires all stacked townhouses and back-to-back townhouses to front onto a public or private street. Akin to the language within VOP 2010, we suggest these housing typologies be provided the opportunity to be generally oriented to front a public or private street.
    d. Policy 4.3.3.7 requires a minimum facing distance for stacked townhouses or back-to-back townhouses of 15m. Anything less than this would require an Official Plan Amendment. A suggestion would be to indicate this is a general target or include within the City-Wide Urban Design Guidelines and a general guideline to achieve.
    e. Policy 4.3.3.8 provides the maximum building length of townhouses, stacked townhouses and/or back-to-back townhouses to be a maximum linear length of 40m. This is less than

the range of 50m to 80m permitted in the City-Wide Urban Design Guidelines. A more general policy indicating that building lengths should be minimized to the extent possible with a reference to the City-Wide Urban Design Guidelines would be more appropriate.

f. Policy 4.3.3.9 includes policies regarding 45-degree angular planes, which should be revisited as this is an outdated policy that is being removed in most planning documents around the world including more recently in the City of Toronto.
g. Policy 4.3.3.10.b provides that podiums of high-rise and mid-rise buildings shall be "designed to the satisfaction of the City". This policy should be deleted as it provides no suitable direction and instead should be supported by the framework within the City-Wide Urban Design Guidelines.
h. Policy 4.3.3.11 requires a minimum setback of 3m for portions of buildings above the podium. This is again too prescriptive and should be more generally stated that a tower setback above a podium along public roads will be required to achieve an appropriate pedestrian environment and mitigate wind impacts.
i. Policy4.3.3.14.b seeks to restrict floor plates for high-rise buildings to be generally no greater than 750 square metres in size. This is 100 square metres less than the threshold of 850 square metres identified within VOP 2010. Design efficiencies are reduced by restricting the floor plate size to a lower threshold and we would suggest re-establishing the general target of 850 square metres in an effort to yield better floor efficiency ratios amongst other benefits. Additionally, the proposed policy in VOP 2025 does not align with the City's Comprehensive Zoning By-law maximum tower floor plate requirements.
j. Policy 4.3.3.14.c This policy sets a minimum setback of 12.5 metres from any side or rear property line for high-rise buildings. This policy is more restrictive setback than any of the minimum rear yard requirements in all of the RM and Mixed-Use Zones in Zoning By-law 001-2021 (e.g., minimum rear yard of 7.5 meters).
k. Policy 4.3.3.15 requires the rooftops of low-rise, mid-rise and high-rise buildings to incorporate landscaped green space, private outdoor amenity space and/or environmental features such as solar panels or green roofs. Again, this policy is too prescriptive and should be an aspirational target, where appropriate. Or alternatively include language like "where practical and appropriate" as included in Policy 4.3.3.19.k.
l. The language within Policy 4.3.3.16 should be softened to identify that parking ramps, loading areas and services should "generally" be incorporated into the building form of Mid-Rise Buildings and High-Rise Buildings. Site design characteristics should be assessed on a site-by-site basis through the site plan process and not be subject to unnecessarily apply for an Official Plan Amendment.
m. Policy 4.3.3.17.b requires a minimum setback of 3m from any property line for a surface parking lot. This policy is too prescriptive to be included in an Official Plan. Suggested revision would require surface parking areas to be appropriately setback from all property lines and screened with sufficient landscaping within the City-Wide Urban Design Guidelines.
n. Policy 4.3.3.19.h limits the amount of surface parking between the front or side of an employment building to be limited to one aisle of parking and no more than 50% of the building frontage. The design of parking lots is more appropriately incorporated within the City-Wide Urban Design Guidelines.
o. Policy 2.14.2.6 and 2.14.2.8 should be deleted or refined as both speak to including sidewalks on both sides of streets. However, one policy indicating that streets should be designed in accordance with City guidelines and engineering requirements would suffice. As there are scenarios where the right-of-way cross sections within the City's Engineering Standards does not require sidewalks to be provided on both sides of the street and the policies proposed would be in the contrary to City Engineering Standards.
p. Policy 2.14.2.13 requires all new residential development and new non-residential development to provide short- and long-term bicycle parking. This deviates from the requirements within the City's Zoning By-law 001-2021. For example, low-density housing

(e.g. single-family homes, townhouses) typically have private garages or storage spaces which serve as de facto long-term bicycle parking. Bicycle parking requirements are better served within the City's Zoning By-law, whereas policies promoting the incorporation of bicycle parking, where appropriate, is more fitting within an Official Plan.

We respectfully request that these sections be reviewed and revised to provide the general framework for these uses. An Official Plan is meant to be a guiding document and the proposed VOP 2025 contains formulaic policies which could create significant challenges for both municipalities and stakeholders. While clear direction is important, policies need to provide room for the evolving needs of its residents and creative planning solutions. Detailed policies could limit a municipality's ability to respond to market shifts, demographic changes or innovation in architecture, public spaces and community building.

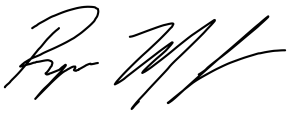
With respect to the Parcel 3, our client is a member in good standing with the Block 27 LOG. We are advised that Bousfields will be submitting a letter on behalf of the Block 27 LOG and we have had an opportunity to review this letter with our Client and we can confirm that our Client supports the comments on behalf of Block 27.

The comments above represent preliminary comments we have with regard to the Draft VOP 2025. We respectfully request a meeting with the City to discuss our preliminary comments on the Draft VOP 2025 in more detail with City staff.

We look forward to continuing our participation in the Forward Vaughan, Draft VOP 2025 process and collaborating with the City. We may make further detailed submissions following the release of subsequent editions of the Draft VOP 2025 and reserve the right to provide additional comments on the current draft, as required.

We respectfully request notice of any future reports and/or public meetings and consultations regarding the Draft OPA, and that we receive notice of any decision of City Council.

Yours truly,
KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan BURPl, MCIP, RPP
Partner



Aidan Pereira
Associate

cc. Client
Vince Musacchio, Interim Deputy City Manager, Planning, Growth Management and Housing Delivery
Christina Bruce, Director of Policy Planning and Special Programs
Ash Faulkner, Senior Planner, Policy Planning and Special Programs
Carly Murphy, Planner, Policy Planning and Special Programs