INNOVATIVE PLANNING SOLUTIONS

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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
Related ERO File: 019-5865 (Regional Municipality of York Official Plan 2022)
Lands in the vicinity of Highway 400 / King-Vaughan Road & Highway 413

Innovative Planning Solutions Inc. ('IPS') is the planning consultant for MCN (King-Vaughan) Inc., owners of lands in Block 35 and Block 42, within North Vaughan and vicinity of Highway 400 and the planned Highway 413 corridor.

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

The landowner has participated in and has made both written and oral submissions to the City of Vaughan as part of their Official Plan Review (OPR) process, *Forward Vaughan*.

A. OVERVIEW OF SUBJECT LANDS

The Subject Lands are located within the King-Vaughan Road and Highway 400/413 node, an area associated with designated and available lands and ongoing development activity. Based on our review of existing and emerging planning considerations, the lands occupy a strategic position within North Vaughan's corridor-based planning framework, evolving urban structure, and growth management direction under PPS 2024. Refer to Figure 1 below for the Subject Lands.

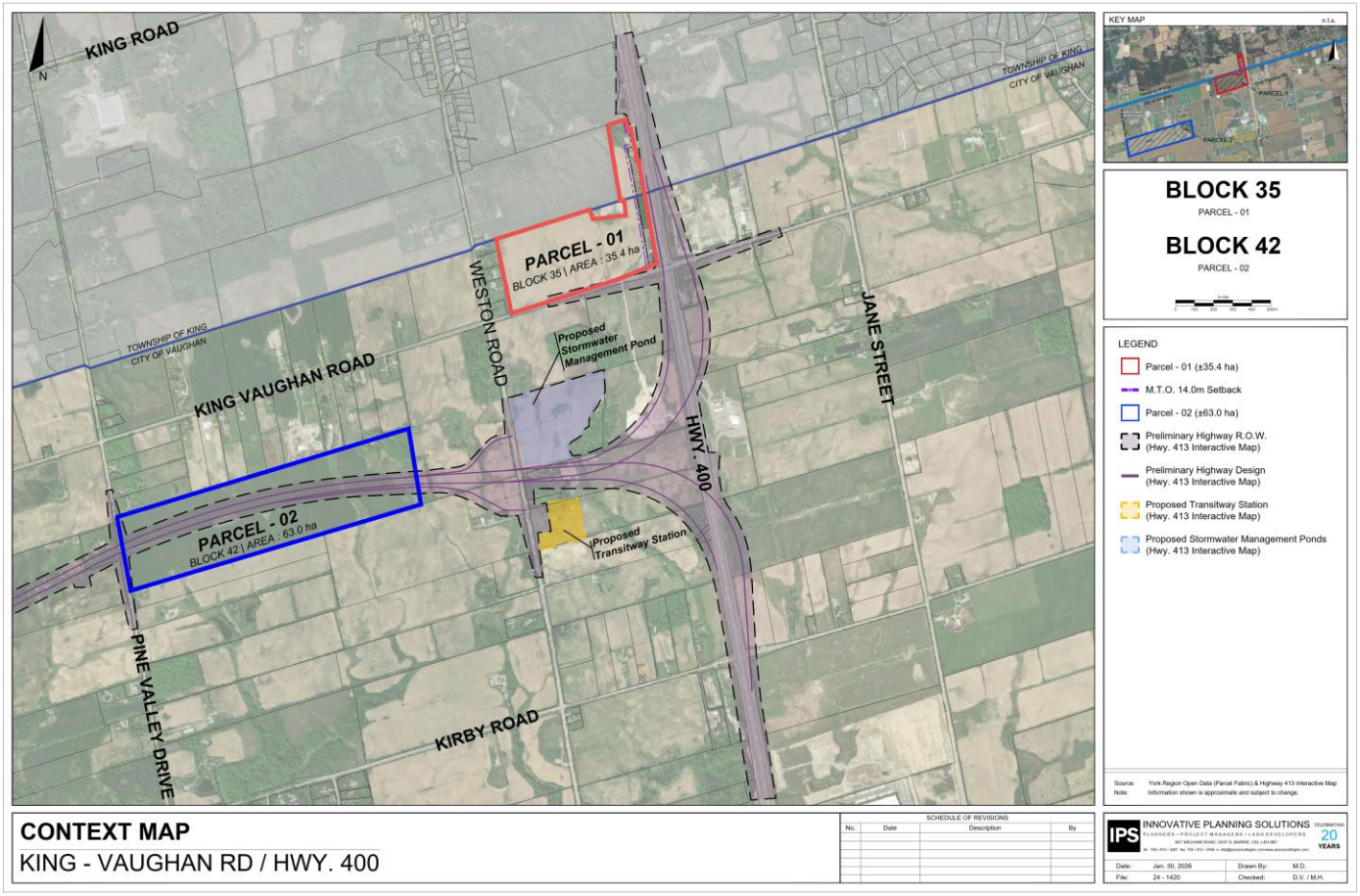


FIGURE 1 – AERIAL VIEW OF THE SUBJECT LANDS AND SURROUNDING CONTEXT

B. REQUESTS TO THE MMAH

This section summarizes the requested modifications to VOP 2025 affecting the Subject Lands.

Parcel 1:

The following requests are for Parcel 1 as shown above in Figure 1. We request that the MMAH:

1. Modify all applicable VOP 2025 schedules to reflect the refined Highway 413 alignment, ensuring accurate depiction of the right-of-way and corresponding land use mapping affecting Parcel 1;

2. Modify Schedule 1 – Urban Structure to:
    a. reflect the *Approved Regional Employment Conversions* applicable to Parcel 1; and,

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b. extend the *Community Areas* urban structure east of the currently mapped employment *conversion limit, consistent with the Approved Regional Employment Conversion and planned context;*

3. Consider identifying King-Vaughan Road and Weston Road in the vicinity of Parcel 1 as *Future Primary Corridor* in Schedule 1B, recognizing their corridor-based growth and transition function*;*

4. Modify Schedule 10 to include the planned transitway infrastructure associated with the proposed Highway 413 corridor and consider future recognition of higher-order transit function, including potential PMTSA-related planning, where warranted, through future study;

5. Modify Schedule 13 – Land Use Designations to:

    a. apply the *Future Development (Non-Employment)* designation to the portion of Parcel 1 subject to the Approved Regional Employment Conversion; and,

    b. apply *Prestige Mixed-Use I and/or Prestige Mixed-Use II* designations to the easterly portion of Parcel 1, generally aligned with the developable area east of the *Approved Regional Employment Conversion* limit;

6. Introduces site- and area-specific policies that provide Parcel 1:
    a. implements and reflects the *Approved Regional Employment Conversion* framework; and,

    b. supports *Future Development (Non-Employment)* and *Prestige Mixed-Use I/II* permissions through an updated implementation policy structure.

<u>Parcel 2:</u>

The following requests are for Parcel 2 as shown above in Figure 1. We request that the MMAH:

1. Modify all applicable VOP 2025 schedules to reflect the refined Highway 413 planned corridor alignment, ensuring accurate depiction of the forthcoming right-of-way and associated developable area limits affecting Parcel 2;

2. Consider identifying King-Vaughan Road in the vicinity of Parcel 2 and the Subject Lands as a *Future Primary Corridor* and recognizing Pine Valley Drive as a *Future Local Corridor* in Schedule 1B, reflecting their long-term corridor and transition role;

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3. Modify Schedule 10 to include the planned transitway infrastructure associated with the proposed Highway 413 corridor and consider future recognition of higher-order transit function, including potential PMTSA-related planning, where warranted, through future study;

4. Modify Schedule 13 – Land Use Designations to remove the *Prime Agriculture* designation and assign the *Rural* designation until such time that the planned land use designations are realized through individual planning applications, or through the anticipated Secondary Plan process.

C. VOP 2025 SCHEDULES

VOP 2025, as endorsed by Vaughan Council on October 22, 2025 provides the Subject Lands the land use planning framework listed below in this section. Please refer to the Appendix for overlays of the Subject Lands (Parcel 1 and 2) on the VOP 2025 schedules.

a) Schedule 1 – Urban Structure

Under Schedule 1 – Urban Structure, the Subject Lands are provided:

- Parcel 1:
    - *Urban Boundary*, *Community Areas and Employment Areas*, and subject to the *Highway 413 Focused Analysis Area (2025)* overlay;

- Parcel 2:
    - *Urban Boundary*, with lands inside the *Urban Boundary* designated *Employment Areas*, and lands outside the *Urban Boundary* designated *Natural Areas and Agriculture*. This parcel is also subject to the Highway 413 *Focused Analysis Area (2025)* overlay.

b) Schedule 1A – Urban Area

- Parcel 1:
    - *Designated Greenfield Area*, and subject to the Highway 413 *Focused Analysis Area (2025)* overlay*;*

- Parcel 2:
    - *Designated Greenfield Area,* and *New Employment Area* and Highway 413 *Focused Analysis Area (2025)* overlays.

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c) 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 identified in this submission, it is our opinion that the Subject Lands and surrounding planning area exhibit characteristics typically associated with strategic growth areas, including proximity to higher-order provincial transportation and infrastructure corridors and planned urban development capacity.

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) do not yet reflect this planned and forthcoming transit infrastructure in proximity to the Subject Lands.

d) 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*.

e) Schedule 2 – Natural Heritage Network

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

- a small portion of the eastern edge of Parcel 1 designated *Woodlands* and *Area to be Determined Through Future Studies*; and,
- the eastern portion of Parcel 2, located outside the *Urban Boundary*, designated *Greenbelt Plan Area, Natural Heritage Network – Core Features, Woodlands, and Area to be Determined Through Future Studies*.

f) Schedule 4 – Provincial Plans and Designations

Schedule 4 – Provincial Plans and Designations, identifies the eastern portion of Parcel 2, located outside the *Urban Boundary, as Greenbelt Plan Area*.

g) Schedule 9A – Street Classification

Schedule 9A – Street Classification provides:

- King-Vaughan Road as a *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.

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Both Parcels 1 and 2 are identified as being subject to the *Highway 413 Focused Analysis Area (2025)* overlay.

h) Schedule 9B – Planned Street Rights-of-Way

Schedule 9B – Planned Street Rights-of-Way provides:

- King-Vaughan Road between Weston Road and Jane Street is planned as a *Major Arterial* with a right-of-way of up to 41 metres; and,
- a planned street system south of King-Vaughan Road, currently under review, is associated with the Highway 400 North Employment Lands Secondary Plan Area and adjacent planning areas east and west of the Highway 400 corridor.

Both Parcels 1 and 2 are identified as being subject to the *Highway 413 Focused Analysis Area (2025)* overlay.

i) Schedule 10 – Major Transit Network

Schedule 10 – Major Transit Network identifies two Potential Commuter Parking Lots planned south of King-Vaughan Road, in proximity to Weston Road and Pine Valley Drive, in association with the planned Highway 413 corridor.

j) Schedule 13 – Land Use Designations

Schedule 13 – Land Use Designations provides:

- the western portion of Parcel 1 is identified as being subject to an *Approved Regional Employment Conversion*, with reference to *the Highway 400 North Employment Lands Secondary Plan (Section 11.4 in Volume 2)* as the applicable implementation framework; and,
- Parcel 2 is designated *Prime Agricultural Area, Natural Areas, New Community Area, and New Employment Area* within the *Urban Boundary, and Rural and Natural Areas* for the eastern portion of the lands located within the *Greenbelt Plan Area.*

k) Schedule 14 – Areas Subject to Secondary Plans

Despite recognizing the Vaughan Metropolitan Centre Secondary Plan (6.2) and the Weston 7 Secondary Plan (6.3), Schedule 14 – Areas Subject to Secondary Plans does not explicitly recognize the Highway 400 North Employment Lands Secondary Plan as applicable to Parcel 1. Instead, Schedule 14 identifies the Urban Boundary portion of Parcel 1 and lands west of Weston Road and north of Kirby Road as being subject to a Required Secondary Plan Area associated with the North-Central Vaughan Secondary Plan Area.

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D. PLANNING RATIONALE

On behalf our client, we are supportive of the *Designated Greenfield Area* designation for the Subject Lands; however, we are requesting further refinement and modification VOP 2025's land use schedules and policies to reflect the future development intent on the Subject Lands.

In our view VOP 2025 provides a piecemeal approach to advancing anticipated development, and weakens the City of Vaughan's ability to proactively facilitate development in an integrated, coordinated, and implementation-ready planning framework.

This section of the letter provides an overview of our planning rationale and contextualizing and justifying the requests for the Subject Lands.

D.1 TRANSITION POLICIES IN 1.3.2

Below are our comments on transition policies in 1.3.2 of VOP 2025, which are specific to Parcel 1 given their current applicability to Volume 2 Secondary Plan and area-specific policies under VOP 2010. Commentary respecting Parcel 2 is provided in other sections of this letter, as Parcel 2 is intended to be addressed through a future Secondary Plan anticipated under VOP 2025.

Section 1.3.2 of VOP 2025 establishes the transition framework governing the relationship between VOP 2010, YROP 2022, and the implementation of VOP 2025. In particular, Policies 1.3.2.2 and 1.3.2.3 explicitly contemplate that, over time, the remaining policies and schedules of Volumes 1 and 2 of VOP 2010 are to be repealed and replaced through the incorporation of updated policies and schedules into VOP 2025, at which point the corresponding legacy Secondary Plans, and any remaining interpretive reliance on VOP 2010 or YROP 2022, *shall be contemporaneously repealed* (Policy 1.3.2.3).

Notwithstanding this clear transition mechanism, **we are concerned with the City's selective approach to updating the Secondary Plans contained in Volume 2 of VOP 2010**.

In our view, VOP 2025 has not given appropriate regard to land use considerations applicable to Parcel 1, particularly as they relate to the Approved Regional Employment Conversions and the planned intent of the Subject Lands as *Designated Greenfield Areas*. **More specifically, the Plan does not reconcile these regional planning outcomes with the operative Volume 2 Secondary Plan framework that continues to apply to the Subject Lands.**

This concern is further reinforced by Policy 1.3.2.1.d. of VOP 2025, which, for greater certainty, provides that any reference to Volume 1 of VOP 2010 within Volume 2 Secondary Plans is to be read as a reference to Volume 1 of VOP 2010 as it existed immediately prior to repeal. As structured, this policy effectively entrenches a legacy land use and implementation framework

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for Parcel 1 that is expressly insulated from the updated growth management and land use planning direction introduced through VOP 2025 and informed by YROP 2022 and PPS 2024.

Notwithstanding Policy 1.3.2.1.iii, **it is our opinion that VOP 2025 fails to demonstrate how the continued reliance on these legacy Secondary Plan permissions for Parcel 1 appropriately implements or transitions from the approved Regional Employment Conversion.** Rather than applying the transition mechanism expressly contemplated by Policies 1.3.2.2 and 1.3.2.3, VOP 2025 defers reconciliation to an indeterminate future amendment. In our opination, this result is a fragmented and internally inconsistent policy framework that neither reflects the Region's Municipal Comprehensive Review outcomes nor provides clear, implementation-ready land use direction at the local level.

D.2 GROWTH MANAGEMENT, URBAN STRUCTURE AND PHASING

The Subject Lands offer the opportunity to realize the City's Population and Employment growth as *Designated Greenfield Areas* adjacent to existing and planed major transportation corridors, to the planning horizon of 2051. *Designated Greenfield Areas* aim to achieve growth targets for the *Developable Area* as listed in Table 2.1 of VOP 2025 and aims to achieve the City's primary objectives.

Policy 2.2.2.5 provides that, *Development in the Designated Greenfield Area shall continue to advance concurrently with Intensification efforts but must take place in coordination with Infrastructure planning.*

As demonstrated in this letter, Parcel 1 is located within an area where significant infrastructure planning and coordination has occurred, and the Subject Lands are capable of accommodating timely intensification consistent with the City's growth management objectives (Policy 2.1.2.1.e. and 2.2.3.7).

It is our understanding that Policies 2.2.2.7 and 2.2.2.8 of VOP 2025 establish the City's sequencing and servicing framework *for New Community Areas* and *New Employment Areas*.

Policy 2.2.2.7 provides that development in *New Community Areas* or *New Employment Areas* is not to proceed until adjacent *Community Areas* or *Employment Areas* have achieved their minimum density targets, while Policy 2.2.2.8 directs that the provision of municipal servicing to *New Employment Areas* is to occur prior to, or in parallel with, servicing to *New Community Areas*.

While Parcel 1 is not designated as a *New Community Area* or *New Employment Area*, these policies provide important context for understanding how growth within the broader planning area is intended to be phased, coordinated, and supported by infrastructure.
When considered together and at the scale of the wider planning area, the Subject Lands provide a coordinated opportunity to advance the City's growth management objectives.

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The request to introduce additional *Community Area* land use permissions for Parcel 1 to facilitate non-residential mixed-use development along the Highway 400 corridor and a complete community, **does not detract from the City's ability to achieve its overarching employment and job targets**. Rather, employment growth is anticipated to be accommodated across the broader planning area, including within the *New Employment Areas* associated with Parcel 2 as those lands are planned and brought forward through a future Secondary Plan under VOP 2025.

It is our opinion that the introduction of additional *Community Area* permissions for Parcel 1 supports a more appropriate land use interface with adjacent lands designated *Community Area*, aligns with PPS 2024 land use compatibility considerations, and enables coordinated, infrastructure-aligned development without compromising long-term employment objectives. It is our view that the request for more *Community Areas* lands for Parcel 1 forms the planned function of the immediate local context, and **maintaining these lands for *Employment Areas* does would not be compatible with the character, form and planned function of the surrounding area, north of King-Vaughan Road, east of Weston Road and west of Highway 400.**

D.3 LAND USE COMPATIBILITY, TRANSITION OF LAND USES & FUTURE PRIMARY AND LOCAL CORRIDORS (KING-VAUGHAN ROAD, WESTON ROAD & PINE VALLEY DRIVE)

The Subject Lands are closely linked to corridor-based development associated with Highway 400, the planned Highway 413 corridor, and the surrounding regional and arterial road network identified on Schedule 9A.

The *Strategic Growth Area* and corridor hierarchy framework in VOP 2025 should recognize the Subject Lands and its location in an emerging corridor growth area supported by existing and planned transportation and servicing infrastructure. **Without this hierarchical consideration, the growth management framework in VOP 2025 risks overlooking the functional role these corridors play in structuring land use transitions, supporting future transit and servicing potential, and coordinating development in corridor-influenced areas, resulting in a more fragmented and less implementation-ready planning outcome for North Vaughan.**

Policy 2.4.5.4.f. provides that *Primary Corridors* and *Local Corridors* are to be designed and developed to implement appropriate transitions of intensification and land use to surrounding Community Areas and/or to provide separation from adjacent Employment Areas. This policy establishes the importance of transition and compatibility as core design and land use planning considerations within corridor contexts.

While Policy 2.4.5.3.f. similarly requires that appropriate transitions be considered and achieved, it does not prescribe or pre-determine a specific mix of uses, whether residential, office, or other employment-supportive uses. Rather, the policy calls for a contextual, site-specific assessment to determine whether a proposed use can function compatibly within the corridor environment.

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Importantly, this approach avoids introducing a policy bias against residential uses and guards against constraining future planning outcomes through premature or rigid land use segregation.

Policy 2.8.1.3 of PPS 2024 supports this notion further, as it provides,

In addition to policy 3.5, 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 employment uses within existing or planned employment areas, in accordance with provincial guidelines.

PPS 2024 does not prohibit non-residential or residential development on lands within 300 metres of employment areas, rather, it establishes a requirement for consideration and assessment of potential impacts on long-term economic vitality of existing or planned employment uses. That assessment is appropriately undertaken through planning applications supported by detailed technical studies and mitigation measures, rather than through pre-determined land use segregation at the official plan level.

The PPS framework contemplates a range of potential land use outcomes, including residential, office, and other employment-supportive uses, provided that long-term employment viability can be demonstrated.

It is our view that the existing arterial roads afford the Subject Lands access should be afforded *Strategic Growth Area* hierarchy to better support anticipated and coordinated growth, appropriate land use transitions, and long-term implementation.

D.4 LAND USE DESIGNATIONS & SITE- AND AREA-SPECIFIC PLANS – SCHEDULE 13

Schedule 13 of VOP 2025 carries forward the legacy land use and development framework established under VOP 2010 for the Subject Lands, resulting in the continued application of an outdated Secondary Plan pursuant to Section 11.4 of VOP 2010 for Parcel 1, and an *Agricultural* designation for the Urban Area portions of Parcel 2.

When VOP 2025 and PPS 2024 are interpreted conjunctively, the continued application of these legacy designations is internally inconsistent with both the range of uses and the higher-order development context planned for the Subject Lands.

It is our view that this approach does not align with the intensification hierarchy associated with the existing Highway 400 corridor, the planned Highway 413 corridor, and the surrounding regional and local arterial road network, and **does not assign the appropriate land uses to reflect the Subject Lands planned intent or reflect the Approved Regional Employment Conversion for Parcel 1**.

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a) Parcel 1:

As identified above, we understand that the City of Vaughan intends to update Volume 2 of VOP 2010 following the approval of VOP 2025 by MMAH. **However, given the immediacy of growth pressures, the advanced state of infrastructure planning in the area, and the role of the Subject Lands in supporting corridor-based growth, we are of the opinion that refinement to the applicable land use framework is warranted now through this process. .**

On this basis, we request that Schedule 13 be updated to reflect the *Future Development (Non-Employment)* and *Prestige Mixed-Use* land use designations, and that these designations be reinforced through site- and area-specific planning, either as stand-alone exercises or as part of the necessary updates to VOP 2010 and its associated Secondary Plan documents.

Notwithstanding policy 3.2.10.2, **it is our opinion that there is near-term need to refine the applicable land use designations for the Subject Lands so that the planning framework functions as an implementation-ready growth management tool rather than deferring resolution to a future update cycle.**

b) Parcel 2:

We request that MMAH modify VOP 2025 to and its alignment and modify Schedule 13 to exclude non-developable area lands **and re-assign an appropriate land use designation to Parcel 2 for its *Developable Area***.

It is our opinion that despite Parcel 2's consideration within the *Agricultural System*, the land is anticipated in the near-term as *Designated Greenfield Areas* within the *Developable Area* categorizations and as such, should be updated accordingly.

In the balance of considerations, the determination of appropriate land use, density, built form and corridor-adjacent transitional areas is to be resolved through site-specific planning applications, supported by technical documentation demonstrating land use compatibility and the avoidance, minimization, and mitigation of potential impacts to existing or planned *Employment Areas*. **Where these standards can be demonstrated and validated through the planning application process, there is no policy justification for precluding such permissions at the official plan level.**

D.5 SECONDARY PLANS

Notwithstanding that the Subject Lands are not currently identified as *Strategic Growth Areas* in VOP 2025 or on Schedule 1B, **it is our opinion that the Subject Lands demonstrate future *Strategic Growth Area* characteristics as contemplated by PPS 2024 and VOP 2025, and that the City of**

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Vaughan ought to address this at the approval stage by refining the applicable land use designations and schedules to ensure an implementation-ready growth framework.

In this context, Policy 5.1.1.4 of VOP 2025 provides a clear and relevant framework for assessing whether the planning regime or proposed development framework applicable to Parcel 1 is capable of delivering the form of growth contemplated by the Plan.

Although Parcel 1 is not presently identified as a *Strategic Growth Area*, the policy's emphasis on context-sensitive intensification, appropriate land use transitions, coordinated infrastructure delivery, and complete community outcomes is directly applicable given the Subject Lands' corridor-influenced location and proximity to evolving community areas.

Continued reliance on a legacy Secondary Plan framework limits the City's ability to apply these principles in a meaningful way. Accordingly, refinement of the applicable land use designations and schedules at the approval stage is warranted to ensure alignment with Policy 5.1.1.4, PPS 2024, and the City's long-term growth management objectives to the 2051 planning horizon.

With respect to Parcel 2, we acknowledge that the lands are intended to be planned through a future Secondary Plan pursuant to VOP 2025 and are not proposed to advance development at this time. As secondary planning proceeds, Parcel 2 should be comprehensively planned to accommodate longer-term community and employment growth, including sufficient employment land capacity to support the City's overall growth strategy and to complement near-term refinement efforts associated with Parcel 1.

E. CONCLUSION

In conclusion, we thank the Ministry of Municipal Affairs and Housing for the opportunity to provide comments on Vaughan Official Plan 2025 and for your consideration of our proposed modification requests as outlined in Section B of this letter. At your convenience, we would be pleased to discuss this submission in greater detail and/or provide any additional information or respond to any questions.

Respectfully Submitted
Innovative Planning Solutions



Mathew Halo, BURPL., RPP
Associate

Darren Vella, MCIP, RPP
Legacy Partner & Founder

Cc. Clients

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