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File: P-2367-a

February 1, 2026

c/o Matthew Meighoo
Municipal Services Office, Central Ontario
Ministry of Municipal Affairs and Housing
777 Bay Street, 16th Floor,
Toronto, Ontario, M7A 2J3
Email: Matthew.Meighoo@ontario.ca

Attention: **Rob Flack, Minister of Municipal Affairs and Housing**

Re: **Electronic Registry Ontario - ERO Number 025-1420**
Ministry Reference File: 19-OP-246866
Comments on the Ministry's Approval of the Vaughan Official Plan 2025
From the Block 42 Landowners Group Inc.
City of Vaughan, Region of York

Dear Minister Flack,

KLM Planning Partners Inc. ("KLM") is the land-use planning consultant acting on behalf of the Block 42 Landowners Group Inc. (the "Landowners"), who collectively own approximately 196.56 hectares (485.93 acres) of land located within Block 42 in the City of Vaughan (the "City"), Region of York (the "Region") (the "Subject Lands"). The Subject Lands are bounded by Weston Road to the east, the King/Vaughan municipal boundary located north of King-Vaughan Road to the north, Pine Valley Drive to the west and Kirby Road to the south. A map identifying the location of the Subject Lands is attached herein. The Landowners participating in the Block 42 Landowners Group are as follows:

Block 42 Landowners Group Inc.	
Owner	**Common Name**
Azure Woods Home Corp, Lazio Farms Holding Inc.	Armland Group
Melrose Properties Inc., Ironrose Investments Inc., Mel-Terra Investments Inc.	Melrose Investments Inc.
Mastro Investments Inc., Masto Capital Partners Inc.	Mastro Investments Inc.
Intu Developments Inc.	Royale Villa Developments Inc
12111 Pine Valley Inc.,	12111 Pine Valley Inc.,
Franline Investments Inc.	Toro Aluminum
4050 King-Vaughan Road Developments Inc.	TACC Developments and Rinomato Group

The Council of the City of Vaughan adopted its comprehensive city-wide Official Plan 2025 ("VOP 2025") on October 28, 2025. We note that Vaughan did not directly respond to the Landowner's comments on the draft VOP 2025 contained in KLM's letter dated June 3, 2025 (copy attached), which was submitted to the Vaughan Committee of the Whole (Public Meeting) on June 4, 2025. It is therefore necessary to submit the comments provided below for your consideration to be addressed in the Ministry's approval of VOP 2025 through ERO 025-1420, which closes at the end of day on February 1, 2026.

In our opinion, the VOP 2025 has not fully responded to the latest Provincial direction on land use planning including the Minister of Municipal Affairs and Housing ("MMAH") objective in standardizing Official Plans in the Province, acknowledging the scoped role of Conservation Authorities ("CA's") in reviewing planning applications and the revised definition of Area of Employment introduced by the Provincial Planning Statement 2024 ("PPS 2024").

Specifically, we request the following be considered and addressed:

1. **Concern With Employment Lands Designation Adjacent to Highway 413 Alignment**

   Schedule 1 "Urban Structure" in VOP 2025 shows the Focused Analysis Area for the proposed Highway 413, which traverses through the northerly portion of Block 42 in an east-west direction. The proposed highway alignment and a swath of lands on either side are designated as "Employment Areas". The remainder of the developable area of Block 42 is shown as "Community Areas". We are concerned with the amount of employment area lands that are shown to the north and south of the highway alignment, of which there may be no basis and which may be overstated, particularly in light of the recent Provincial Planning Statement ("PPS 2024") taking effect on October 20, 2024 and changes to the definition and determination of what constitutes as employment area lands. We believe the City has not undertaken the necessary studies to confirm the appropriate amount of employment lands required for the entire city in consideration of how employment lands are now defined in the PPS 2024. It is important for the City to determine and confirm whether there is a sufficient supply of existing and planned employment lands throughout the City and whether the employment lands designated in Block 42 is sufficient or exceeds the required need and should be reduced in scope or eliminated altogether.

   In light of the above, we request that the Urban Structure – Schedule 1 in VOP 2025 either eliminate the employment area designation north and south of the highway alignment given the City's lack of a more fulsome employment land needs assessment following the change to employment areas introduced in the PPS 2024, or alternatively, include policies in VOP 2025 that would further give consideration through a future Secondary Plan process to allow for modifications to the employment area boundary to be refined and supported by more detailed planning studies at that time. Modification of the boundary of the employment area to an area that is less than what is currently shown

(or eliminated altogether) and which would not follow any identifiable features such as King Vaughan Road would be appropriate.

Requested Ministry Action:

a) We have attached for your benefit, a side-by-side comparison of the "City Proposed" versus a modified Schedule 1 – Urban Structure describing what we are seeking in order that Schedule 1 can be appropriately revised to show less "Employment Areas" and more "Community Areas" adjacent to the Highway 413 alignment.

b) We also request that the Minister amend VOP 2025 to add a new policy in Section 5.1.1 "Secondary Plans" to address the above schedule change in Block 42 as follows:

5.1.1.3.1 The exact amount of Employment Areas to be provided, if any, adjacent to the proposed Highway 413 alignment in Block 42 should be confirmed through an employment land needs assessment prepared by the City for the entire municipality, or if one has not been initiated prior to the Secondary Plan for Block 42 proceeding then such employment land needs assessment for Block 42 can be prepared by the block landowners as part of the justification studies required through the Secondary Plan process.

2. Concern with Environmental Policies

We advise the Minister that some environmental policies in the draft VOP 2025 document presented to Vaughan Council in September 2025 changed significantly from the final version that was adopted in October 2025, and there was no mention of the specific policy sections that were changed in Sections 2.7.3 and 2.7.4 in the City Planning staff's Communication letter to Vaughan Council. We find this lack of transparency concerning.

We note that Section 2.7.3.1(d) in VOP 2025 now refers to *"securing new Core Features and open space for improved connectivity of the Natural Heritage Network through the Development approval process…*" whereas in the May and September 2025 draft documents the draft policies spoke to "*new enhancement areas*" rather than "*Core Features and open space"*. We are not satisfied with this revised policy language as we do not agree with new core features being identified on tableland. We are of the opinion that tableland should be used for housing and other non-residential purposes within this block.

In the May and September 2025 draft documents, draft Section 2.7.3 had a sub-heading called "Enhancement Areas" just before policy 2.7.3.17. In addition, there was a definition of "Enhancement Areas" in the September 2025 draft. In the October 2025 final adopted version, Section 2.7.3.17 is now titled "*Lands Designated "To be Determined through Future Studies""* and all reference to "enhancement areas" has disappeared throughout VOP 2025 except in the definition of "Natural Heritage System".

In our opinion, Section 2.7.3.17 should be removed from VOP 2025 and any subsequent policies and mapping that relate to it should be as well. We are satisfied with any linkages to be enhanced, maintained, etc. on non-developable land but not on tableland, supported through a detailed Environmental Impact Study ("**EIS**") in the future. Schedule '2' in VOP 2025 shows the purple-coloured areas within the existing NHS system that refer to "*To be Determined Through Future Studies*". We are of the opinion that all reference to "Future Study Areas" should be eliminated in favour of undertaking an EIS, which will assess and confirm the developable lands and any linkages (i.e. enhancement areas").

Requested Ministry Action:

That Section 2.7.3.1 and 2.7.3.1.d) remove reference to "open space" such that it is clear that the Natural Heritage network focus on lands that are identified as Core Features only. Furthermore, we recommend that the entire Section entitled "Lands Designated "To Be Determined through Future Studies"" and the accompanying designation on Schedule '2' be deleted on the basis that the evaluation of environmental impacts on "Core Features" will be identified through a future EIS as provided in Section 2.7.4 of the VOP 2025.

3. General Issues

Our June 3, 2025 letter to the City identified a number of policy concerns and implementation issues with the Draft VOP 2025, which were not addressed by the City. We identify the following matters and the required Ministry action:

1. Section 2.2.2 "Phasing Growth" contains phasing policies including Section 2.2.2.7, which states: "*That development in New Community Areas or New Employment shall not occur until adjacent Community Areas or Employment Areas have achieved (*emphasis added*) their minimum density.*" We have a series of issues with this policy, as follows:

    - The term "achieve" is not defined. Does this mean that policies prescribing the required density target must be included within an approved secondary plan or official plan amendment, or that development contemplated by an approved secondary plan or official plan amendment has been built?

    - The development in New Community Areas or New Employment Areas, specifically the establishment of secondary plans and block plans, etc. should not be prejudiced on the timing or the ability of adjacent lands to develop, particularly given the multitude of potential issues or individual landowner development timing, which could delay the development of any parcel of land. In other words, if adjacent lands are unable to or do not wish to develop, alternatives for new growth should be facilitated by the VOP, not discouraged.

Requested Ministry Action: That Section 2.2.2.7 be eliminated or rewritten to allow New Employment Areas and New Community Areas to develop whenever any of these areas

are ready to proceed, and that these areas shall not be restricted in any way by adjacent blocks reaching their minimum density.

2. Section 2.2.2.8 in the "Phasing Growth" section states "*That the provision of municipal servicing to New Employment Areas shall proceed prior to or in parallel with servicing to New Community Areas*." We do not understand the rationale for requiring employment areas to be serviced in advance of or at the same time as community areas. This implies that servicing to New Community Areas cannot occur in advance of servicing New Employment Areas, which may not be appropriate given the high demand/need for housing in the City.

   Requested Ministry Action: That Section 2.2.2.8 be eliminated or rewritten to allow New Employment Areas and New Community Areas to be serviced whenever any of these areas are ready to develop.

3. In Appendix 3 – under the "Fish Habitat" of the Core Feature column, the words "*with a defined bed and bank*" should be added after the word "*Watercourse*", to reflect limits of current conservation authority regulation.

   Requested Ministry Action: The text should be revised to read as follows: *"15 metres or 30 metres depending on the thermal regime of the Watercourse with a defined bed and bank*".

4. In Appendix 3 – "*Sensitive Surface Water Features*" which is not a defined term, should be removed as drainage features are already captured as intermittent and permanent features, and must reflect differentiation from ephemeral.

   Requested Ministry Action: Remove the words "*Sensitive Surface Water Features*" in Appendix 3.

5. In Appendix 3 – "*Seepage Areas and Springs*" appear to be protected which is not appropriate. Some of these features have no associated important functions and should not warrant automatic protection. The determination of which features should be protected should be based on function and subject to the findings of an EIS.

   Requested Ministry Action: Remove the words "*Seepage Areas and Springs*" in Appendix 3.

6. Section 2.7.3.6 and 2.7.3.7 – These sections state:

   - *That Core Features, as identified on Schedule 2 consist of the key Natural Heritage Features and Areas and Key Hydrologic Features and their associated minimum Vegetation Protection Zones as shown in Appendix 3.*

   - *That the limits of the Core Features referred to in Appendix 3 need to also account for the greatest extent of any Natural Hazard components, including but not limited to the long-term stable top of slope/bank, stable toe of slope, regulatory*

floodplain, and or Meander Belt and any contiguous Natural Heritage Features and Areas.

Our concern is that core features should not be expanded to include "contiguous natural features and areas".

Requested Ministry Action: Remove the words "*and any contiguous Natural Heritage Features and Areas*" in Section 2.7.3.7.

7. Section 2.7.3.7 – This policy states that the core feature limit: "*is inclusive of any natural hazard components, including … the regulatory floodplain.*" In some cases (spillways for example), in urban / semi-urban contexts where the floodplain is influenced by urbanization, it is not always appropriate to consider the flood line, as is, as the natural feature limit. The intent of this policy is not clear. Floodplain is not a natural feature although it may be congruent.

   Requested Ministry Action: Revise Policy 2.7.3.7 to include the following additional language at the end of the existing policy "subject to a detailed Environmental Impact Study as part of a future development application or Secondary Plan".

8. Appendix 3 and Section 2.7.4.15 – This table and policy reference wetlands and their minimum vegetation protection zones. Appendix 3 identifies that a 30 metre buffer is required for wetlands outside of the Greenbelt and ORMCP areas, which can be deemed excessive for small and low function wetlands where a 10 metre buffer can be provided in accordance with Provincial requirements. Appendix 3 should be revised to indicate the minimum buffer for wetlands outside of the Greenbelt and ORMCP to be 10 metres.

   Section 2.7.4.15 d) states that non Provincially Significant Wetlands outside of provincial plan areas that are: "*determined by the City and the TRCA to have features to be protected will be maintained in their current location and state…*". This is not consistent with new Conservation Authorities Act under which protection of natural heritage features/ecological function has explicitly been removed from the mandate of CAs.

   Section 2.7.4.15 d) also states that this determination by the City and TRCA does not apply: "*where it is demonstrated through technical studies, completed to the satisfaction of the City and TRCA, that the ecological and Hydrological Function of the Wetland area is minimal and all efforts to protect the Wetland through the mitigation hierarchy have been exhausted*". As noted above, the protection of natural heritage features/ecological function has explicitly been removed from the mandate of CAs.

   Section 2.7.4.15 d) also states that compensation must be directed to: "*on-the-ground ecosystem restoration*". This implies that cash-in-lieu payment is not permitted. Cash-in-lieu should be maintained as an option for compensation.

   Requested Ministry Action: Revise Appendix 3 and Section 2.7.4.15 to address the items identified above so as to ensure consistency with the Conservation Authorities Act and the mandate of CAs, and to permit cash-in-lieu as an option for compensation for ecosystem restoration.

9. Sections 2.7.4.17 and 2.7.4.18 – These policies note that the identification of Significant Wildlife Habitat ("**SWH**") will rely on criteria provided by the Province. We are advised that the guidance provided by the Province does not include appropriate thresholds within those recommended criteria. We respectfully request that the VOP 2025 permit determination of the presence of SWH through an EIS, or the City should incorporate their own thresholds similar to other municipalities.

   The PPS 2024 does not prohibit development within SWH as is implied in these sections. Development within SWH is not permitted unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. Should it be confirmed that there are no negative impacts, development can occur.

   Habitat of endangered or threatened species is specifically excluded from the provincial definition of SWH and should not be included under SWH in the OP. It is further noted that there is no reference to "significant" habitat of endangered or threatened species in the PPS 2024.

   Requested Ministry Action: Revise Sections 2.7.4.17 and 2.7.4.18 to: permit determination of the presence of SWH through an EIS, or the City should incorporate their own thresholds similar to other municipalities; clarify that development can be permitted in SWHs when there are no negative impacts demonstrated; and, ensure the definition of SWH in VOP 2025 is consistent with the provincial definition of SWH.

10. Section 2.14.1.20 – This section provides that a minimum of two north/south and two east/west collector streets be provided in new block Development, where feasible. This policy is overly prescriptive and should simply direct that the number and extent of collector streets within new block development be determined at the secondary plan stage, based upon detailed traffic studies.

    Requested Ministry Action: Revise Section 2.14.1.20 to require the number and extent of collector streets within new block development to be determined at the secondary plan stage, based upon detailed traffic studies.

11. Section 5.1.1.5 provides that secondary plans will be advanced by the City in consultation with the public. Private landowner groups are well-positioned to efficiently advance the work associated with the completion of a secondary plan in close collaboration with the City, the public and other stakeholders. In doing so, this removes the financial burden on the municipality and facilitates the timely advancement of necessary planning approvals required to deliver needed housing. As such, we respectfully request that this policy be revised to permit secondary plans to also be privately initiated, subject to the involvement of all stakeholders.

    Requested Ministry Action: Revise Section 5.1.1.5 to permit secondary plans to also be privately initiated, subject to the involvement of all stakeholders.

12. Definition of *Major Office* – *Major Office* is defined as having a gross floor area of greater than 4,000 square metres or with approximately 200 jobs or more. The policy framework

of the Draft OP directs Major Office to Strategic Growth Areas consistent with the PPS 2024. The VOP 2010 identifies major office uses as having a gross floor area of greater than 12,500 square metres and an office use as having a gross floor area of less than 12,500 square metres.

For reference, the origin of the 4,000 square metres threshold for Major Office uses comes from the definition for Major Office in the now repealed A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan"). This definition was also included in the 2022 York Region Official Plan to conform to the Growth Plan. As the Growth Plan has now been repealed, there is no framework in provincial planning to prescribe the 4,000 square metre threshold. The PPS 2024 restricts Major Office uses to Strategic Growth Areas ("**SGAs**") and limits office uses in employment areas to be associated with the primary employment use e.g. manufacturing, warehousing, etc.

As currently proposed, this definition has the effect of limiting the amount of office use within Community Areas and Employment Areas when associated with a permitted employment use, which would need to have an area of less than 4,000 square metres in order to not be considered Major Office. The proposed policy framework also discourages office uses in an economy where demand for office uses is declining. We believe a more flexible framework to encourage office uses both within SGAs and outside including areas ancillary to employment uses and along 400 series highways is an appropriate policy response.

Requested Ministry Action: Revise the definition of *Major Office* to specify that they must be within a freestanding building and increase the threshold to 12,500 square metres consistent with the Official Plan 2010. This will permit office uses within Community Areas and Employment Areas when associated with an employment use which may exceed 4,000 square metres, and which are otherwise appropriate.

13. Schedule 2 "Natural Heritage Network" – This Schedule denotes an isolated pond on the Subject Lands, which is identified as a core feature. Isolated ponds should not be core features without having knowledge of the function and origin of same.

    Requested Ministry Action: We request that the Province review the Schedule 2 "Natural Heritage Network" mapping to ensure isolated ponds are not identified as Core Features.

14. Schedule 9B "Planned Street Rights-of-Way" – We note that the right-of-way width for major collector roads has increased from 26 metres in the VOP 2010 to 30 metres in the VOP 2025. We are not clear of the rationale for the increase and what has prompted the additional 4 metres. This land could otherwise be used for development.

    Requested Ministry Action: We request that the Province amend this policy to maintain the right-of-way width for major collector roads at 26 metres in the VOP 2025, consistent with the existing policy framework in VOP 2010.

Should you have any questions with respect to the enclosed, please do not hesitate to contact the undersigned. We would be pleased to meet with Ministry staff to assist with further review of the Adopted VOP 2025 to ensure that it appropriately implements development in Vaughan and is consistent with recent Provincial directions.

Yours truly,

KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan, BURPL, MCIP, RPP
Partner

Copy: Block 42 Landowners Group Inc.

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File: P-2367

June 3, 2025

City of Vaughan
Development Planning Department
2141 Major Mackenzie Drive
Vaughan, ON L6A 1T1

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

Re: **Committee of the Whole (Public Meeting), Wednesday June 4, 2025**
Agenda Item. 4(10)
City of Vaughan revised Draft New Official Plan, May 2025
Block 42 Landowners Group Inc.
City of Vaughan
Regional Municipality of York

KLM Planning Partners Inc. ("KLM") is the land-use planning consultant acting on behalf of the Block 42 Landowner Group Inc. (the "Landowners"), who collectively own approximately 196.56 hectares (485.93 acres) of land located within Block 42 in the City of Vaughan (the "City"), Region of York (the "Region") (the "Subject Lands"). The Subject Lands are bounded by Weston Road to the east, the King/Vaughan municipal boundary located north of King-Vaughan Road to the north, Pine Valley Drive to the west and Kirby Road to the south. A map identifying the location of the Subject Lands is attached herein.

KLM has been monitoring and participating in the City's Official Plan Review (the "OPR") on behalf of the Landowners and previously provided comments to the City on July 31, 2024 related to the revised Draft Comprehensive Official Plan Amendment, which combined the previous Part A and Part B OPR work, released in June 2024. In May 2025, the City released a further revised Draft New Official Plan (the "Draft OP") for review and comment. KLM has completed a review of the Draft OP on behalf of the Landowners and provide the following comments:

1. The Province has revised the definition of "area of employment" in the Provincial Planning Statement, 2024 (the "PPS 2024"), which now restricts Major Office uses to Strategic Growth Areas and limits office uses in employment areas to be associated with the primary employment use e.g. manufacturing, warehousing, etc. As such, Major Office uses are not part of an "area of employment". This definition was not in effect when the Region completed their land needs assessment and their Municipal Comprehensive Review, to determine the quantum of Employment Area required to accommodate Employment growth to 2051.

   It is not clear how the new definition for Area of Employment has been addressed as part of the Draft OP. With this change in definition, which excludes offices, retail, hotel and other non-traditional employment uses, the quantum of lands designated Employment Area within Block 42 and elsewhere in the City may be overstated. The City should evaluate the quantum of Employment Area required based on the proposed revised definition prior to approval of the Draft OP, to avoid over designating employment lands, and the need to consider requests to

convert employment lands in the future. We would respectfully request a meeting with staff to discuss the above.

2. Section 2.2.2.5 provides that development in New Community Areas or New Employment Areas is to be phased, such that development within same will not occur until adjacent Community Areas or Employment Areas have achieved (emphasis added) their minimum density targets. We have a series of issues with this policy, as follows:
    - The term "achieve" is not defined. Does this mean that policies prescribing the required density target must be included within an approved secondary plan or official plan amendment, or that development contemplated by an approved secondary plan or official plan amendment has been built?
    - The development in New Community Areas or New Employment Areas, specifically the establishment of secondary plans and blocks plans, etc. should not be prejudiced on the timing or the ability of adjacent lands to develop, particularly given the multitude of potential issues which could delay the development of any parcel of land. In other words, if adjacent lands are unable to or do not wish to develop, alternatives for new growth should be facilitated by the Draft OP, not discouraged.

3. Section 2.2.2.6 notes that the provision of municipal servicing to greenfield Employment Areas will proceed prior to or in parallel with servicing to New Community Areas. We do not understand the rationale for requiring employment areas to be serviced in advance of or at the same time as community areas. This implies that servicing to new Community Areas cannot occur in advance of servicing to new Employment Areas, which may not be appropriate given the high demand/need for housing in the City.

4. Section 2.2.3 provides the framework for the types of residential uses permitted within Community Areas. We note that this includes single-detached, semi-detached, townhouses and additional residential units, but excludes mid-rise apartment residential and mixed-use development. It is our opinion that low-rise, 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 will require the provision of higher density built form. 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. As such we respectfully request that low-rise and mid-rise apartment residential and commercial/residential mixed-use development be permitted within Community Areas.

5. Table 2.3 – under the "Fish Habitat" of the Core Feature column, the words "with a defined bed and bank" should be added after the word "watercourses", to reflect limits of current conservation authority regulation.

6. Table 2.3 – "Sensitive surface water features" which is not a defined term, should be removed as drainage features are already captured as intermittent and permanent features, and must reflect differentiation from ephemeral.

7. Table 2.3 – Seepage areas and springs all appear to be protected which is not appropriate. Some of these features have no associated important functions and should not warrant automatic protection. The determination of which features should be protected should be based on function and subject to the findings of an EIS.

8. Section 2.7.3.6 and 2.7.3.7 – These sections state:

- That Core Features, as identified on Schedule 2 consist of the key Natural Heritage Features and Areas and Key Hydrologic Features and their associated minimum Vegetation Protection Zones as shown in Table 2.3.

- That the feature limit is inclusive of any natural hazard components, including but not limited to, the long-term stable top of slope/bank, stable toe of slope, regulatory floodplain, and or meander belt and any contiguous natural features or areas.

Features should not be expanded to include "contiguous natural features or areas.

9. Section 2.7.3.7 – This policy states that the feature limit: "is inclusive of any natural hazard components, including … the regulatory floodplain." In some cases (spillways for example), in urban / semi-urban contexts where the floodplain is influenced by urbanization, it is not always appropriate to consider the flood line, as is, as the natural feature limit. The intent of this policy is not clear. Floodplain is not a natural feature although it may be congruent.

10. Table 2.3 and Section 2.7.4.15 – This table and policy reference wetlands and their minimum vegetation protection zones. Table 2.3 identifies that a 30 metre buffer is required for wetlands outside of the Greenbelt and ORMCP areas (as was the case for the Vaughan Official Plan, 2010 (the "VOP 2010")), which can be deemed excessive for small and low function wetlands. This is inconsistent with policy 2.7.4.15 and should be revised.

    Section 2.7.4.15 d) states that non Provincially Significant Wetlands outside of provincial plan areas that are: "determined by the TRCA to have features to be protected shall be maintained in their current location and their current state". This is not consistent with new Conservation Authorities Act under which protection of natural heritage features/ecological function has explicitly been removed from the mandate of Conservation Authorities ("CAs").

    Section 2.7.4.15 d) also states that this determination by TRCA does not apply: "if it is demonstrated through technical studies (i.e., Environmental Impact Study) completed to the satisfaction of the TRCA, that the ecological and hydrological function of the wetland area is minimal and all efforts to protect the wetland through the mitigation hierarchy (i.e., avoid, minimize, mitigate, compensate) have been exhausted". As noted above, the protection of natural heritage features/ecological function has explicitly been removed from the mandate of CAs.

    Section 2.7.4.15 d) also states that compensation must be directed to: "on-the-ground ecosystem restoration". This implies that cash-in-lieu payment is not permitted. Cash-in-lieu should be maintained as an option for compensation.

11. Sections 2.7.4.17 and 2.7.4.18 – These policies note that the identification of significant wildlife habitat ("SWH") will rely on criteria provided by the Province, specifically the Ministry of Natural Resources. Guidance provided by the Province does not include appropriate thresholds within those recommended criteria. We respectfully suggest the Draft OP permit determination of the presence of SWH through an Environmental Impact Study, or the City should incorporate their own thresholds similar to other municipalities.

    We also note that "Concentrations of biodiversity" as a SWH criterion is too subjective and vague and should be removed.

    The PPS 2024 does not prohibit development within SWH as is implied in these sections. Development within SWH is not permitted unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. Should it be confirmed that there are no negative impacts, development can occur.

Habitat of endangered or threatened species is specifically excluded from the provincial definition of SWH and should not be included under SWH in the OP. It is further noted that there is no reference to "significant" habitat of endangered or threatened species in the PPS 2024.

12. Section 2.14.1.27 provides that due to noise and other environmental nuisances, certain residential uses such as single detached, semi-detached, townhouses and stacked townhouses are prohibited directly adjacent to Provincial highways. Residential uses can coexist adjacent to Provincial highways subject to ensuring appropriate mitigation is provided. As such, we respectfully request that this policy be modified to identify that those residential uses can be permitted subject to appropriate mitigation.

13. Section 2.14.1.37 – This section provides that a minimum of two north/south and two east/west collector streets be provided in new block Development, where feasible. This policy is overly prescriptive and should simply direct that the number and extent of collector streets within new block development be determined at the secondary plan stage, based upon detailed traffic studies.

14. Sections 4.3.3.2 to 4.3.3.21 provide built form policy requirements applicable to the design of the built environment. In many instances, prescriptive requirements associated with setbacks, unit sizes, building separation, etc. are provided, which in our opinion are more appropriately defined in the implementing Zoning By-law. We respectfully request that these sections be reviewed and revised to provide the general framework for these uses, rather than prescriptive requirements.

15. Section 5.1.1.5 provides that secondary plans will be advanced by the City in consultation with the public. Private landowner groups are well-positioned to efficiently advance the work associated with the completion of a secondary plan in close collaboration with the City, the public and other stakeholders. In doing so, this removes the financial burden on the municipality and facilitates the timely advancement of necessary planning approvals required to deliver needed housing. As such, we respectfully request that this policy be revised to permit secondary plans to also be privately initiated, subject to the involvement of all stakeholders.

16. Definition of Major Office – Major Office is defined as having a gross floor area of greater than 4,000 square metres or with approximately 200 jobs or more. The policy framework of the Draft OP directs Major Office to Strategic Growth Areas consistent with the PPS 2024. The VOP 2010 identifies major office uses as having a gross floor area of greater than 12,500 square metres and an office use as having a gross floor area of less than 12,500 square metres.

    For reference, the origin of the 4,000 square metres threshold for Major Office uses comes from the definition for Major Office in the now repealed A Place to Grow: Growth Plan for the Greater Golden Horseshow (the "Growth Plan"). This definition was also included in the 2022 York Region Official Plan to conform to the Growth Plan. As the Growth Plan has now been repealed, there is no framework in provincial planning to prescribe the 4,000 square metre threshold. The PPS 2024 restricts Major Office uses to Strategic Growth Areas and limits office uses in employment areas to be associated with the primary employment use e.g. manufacturing, warehousing, etc.

    As currently proposed, this definition has the effect of limiting the amount of office use within Employment Areas when associated with a permitted employment use, which would need to have an area of less than 4,000 square metres in order to not be considered Major Office. As such we respectfully request that the City modify the definition of Major Office to specify that they must be within a freestanding building and increase the threshold to 12,500 square metres consistent with the Official Plan 2010. This will permit office uses within an employment area

associated with an employment use which may exceed 4,000 square metres, and which are otherwise appropriate.

17. Watercourse is not defined in the Glossary. It is noted that under the updated *Conservation Authorities Act*, a regulated watercourse is only one with a defined channel with a bed and bank.

18. Schedule 2 – This Schedule denotes an isolated pond on the Subject Lands, which is identified as a core feature. Isolated ponds should not be core features without having knowledge of the function and origin of same.

19. Schedule 9B – We note that the right of way width for major collector roads has increased from 26 metres in the VOP 2010 to 30 metres in the Draft OP. We are not clear the rationale for the increase and what has prompted the additional 4 metres. This land could otherwise be used for development. We respectfully request clarification in this regard.

Thank you for the opportunity to provide input into the OPR. We kindly request notice of any future reports and/or public meetings and consultations regarding the Draft OP, and that we receive notice of any decision of City Council.

Should you have any questions or concerns of if you require any additional information on the contents of this letter, please do not hesitate to contact the undersigned.

Yours truly,
KLM PLANNING PARTNERS INC.

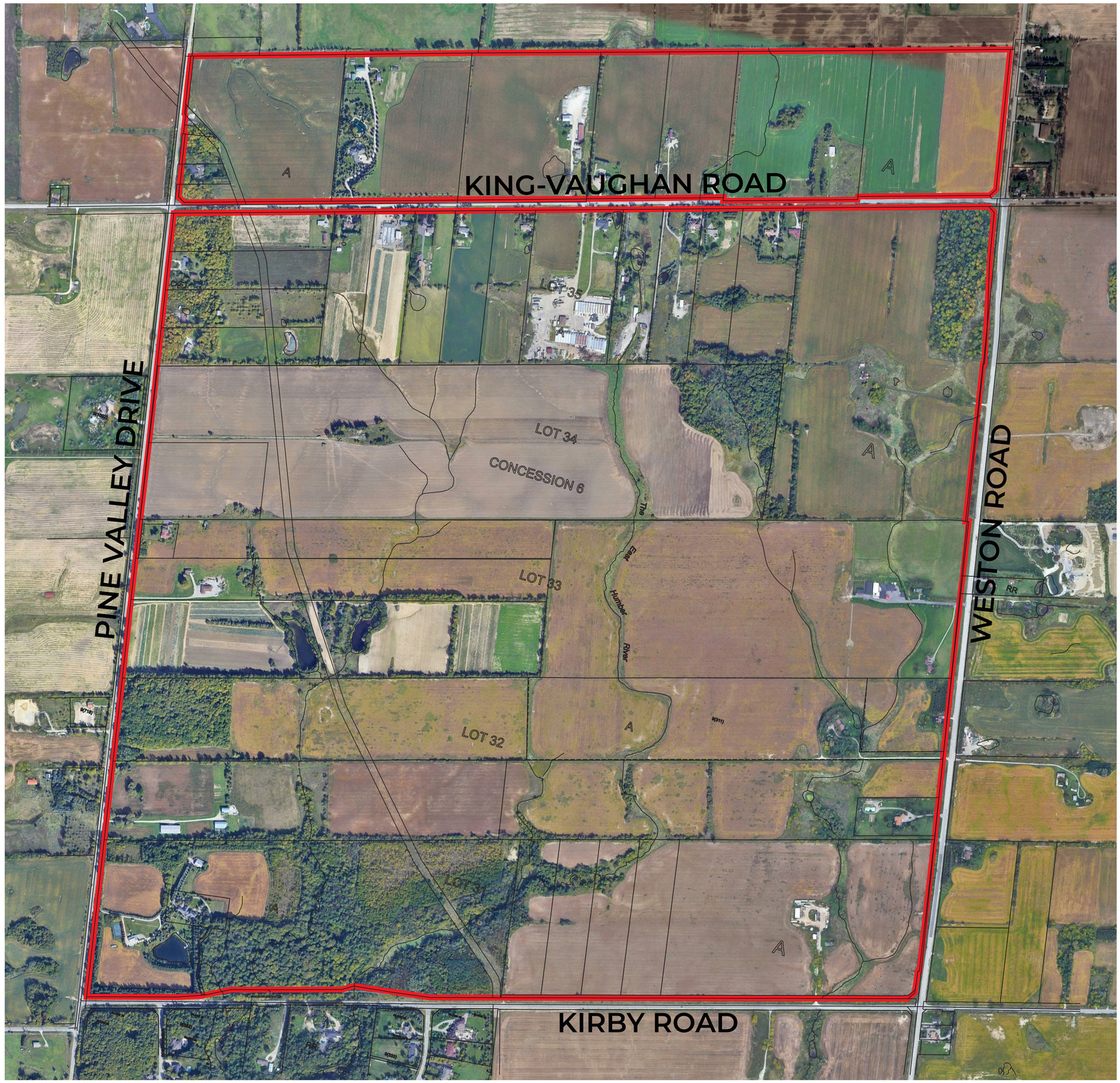


Tim Schilling BES, MCIP, RPP
Senior Planner

cc. Client
Brian Henshaw, Beacon Environmental
Fausto Filipetto, Project Manager

BLOCK 42 LOCATION MAP

City of Vaughan



LEGEND

Subject Lands

N.T.S.
JUNE 3, 2025

KLM PLANNING

P-2367_Location Map_June 2025