WESTON CONSULTING

Ministry of Municipal Affairs and Housing
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February 1, 2026
File No. 9220-1

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

RE: Vaughan Official Plan 2025 and Vaughan Metropolitan Centre Secondary Plan 2025 Modification Request
ERO 025-1420 (Ministry Reference No. 19-OP-246866)
99 Peelar Road, City of Vaughan

Weston Consulting is the authorized planning consultant for the Kiriakou Group, L.K. Trustco Inc. and 2752194 Ontario Inc. (together, the "Owners"), the owners of the lands municipally known as 99 Peelar Road in the City of Vaughan (the "Site"). We have monitored and actively participated in the City of Vaughan's Official Plan Review process on behalf of the Owners, including the provision of comments and input to the City throughout the review. Notwithstanding this involvement, concerns remain with respect to the Vaughan Official Plan 2025 ("VOP 2025"), including the Vaughan Metropolitan Centre Secondary Plan 2025 ("VMCSP 2025"), as adopted by Vaughan City Council on October 28, 2025. Accordingly, we are providing the following comments to the Ministry of Municipal Affairs and Housing for consideration as part of the approval process under Section 17(34) of the *Planning Act*.

As outlined further below, the Site is located within a Protected Major Transit Station Area ("PMTSA") and a Regional Centre in accordance with the York Region Official Plan, 2022. However, the policy approach reflected in the VMCSP 2025 inappropriately plans the Site solely for stormwater management purposes, even though the technical study to determine the stormwater management solution for the relevant portion of the plan area has not yet been completed. Further, if the Site is not required for stormwater management purposes, the VMCSP 2025 indicates the lands would be designated Parks. This approach is unjustified and results in an inappropriate use of land within a PMTSA and Regional Centre served by a subway station. As outlined further below, the Site can accommodate a mix of uses, including employment-generating hotel uses and new homes, while also contributing to parkland and open space objectives. Modifications to the VMCSP 2025 are required to properly implement provincial policy and establish an appropriate policy framework for the Site.

The Site

The Site is located within the southeast quadrant of the VMCSP 2025 area on the south side of Peelar Road, west of Jane Street (Figure 1). It is generally rectangular in shape, and the lands to the north and east currently consist of employment uses. The Site abuts Highway 407 to the south, while the adjacent property immediately west nearest to the Black Creek is currently vacant with some vegetation and was transferred into the City's ownership in 2022.

The Site has a total lot area of approximately 1.42 hectares (3.51 acres) and has an approximate frontage of 168 metres along Peelar Road. It is currently occupied by a two-storey banquet hall and event venue known as the Hazelton Manor, at-grade parking, and two vehicular access points from Peelar Road. The current banquet hall has been in operation since 2010 and has been operating as an event space since 1969.



Figure 1: Aerial Image of the Site

VOP 2025 and VMCSP 2025

The Owners have actively participated in the VOP 2025 and VMCSP 2025 update processes, and Weston Consulting has submitted several letters on the Owners' behalf for review and consideration by Staff and the VMC Sub-Committee. The Council-approved VOP 2025, which includes the VMCSP 2025, identifies the Site as within an area intended for intensification, but inappropriately applies land use designations that anticipate its use for flood mitigation infrastructure, notwithstanding that the technical studies to determine the appropriate flood mitigation strategy for the area have not been completed. The effect of the policy framework is to identify the Site as required for flood mitigation purposes; if the not-yet-completed studies indicate the lands are not required for that purpose, the land use reverts to Parks. As outlined further below, this approach is fundamentally inappropriate and does not represent good land use planning.

More specifically, the Site is identified within the "*Vaughan Metropolitan Centre*" and the PMTSA associated with the VMC Subway Station on Schedule 1B – Strategic Growth Areas of the VOP 2025. Although the surrounding lands are identified as "*Strategic Growth* Area", the Site is identified as "*Natural Areas and Agriculture*" on Schedule 1 – Urban Structure of the VOP 2025. The Site is also identified as "*Parks and Open Space*" and

designated *"Environmental Open Space"* on Schedule E – Parks and Open Spaces and Schedule G – Land Uses of the VMCSP 2025.

In addition, the Site is subject to the "*Black Creek Flood Mitigation*" and "*Special Policy Area"* overlays on Schedule I – Floodplain and Environmental Open Space of the VMCSP 2025 and is subject to policy 7.7.8, which provides as follows:

> "*Concerning Environmental Open Space identified as Special Policy Area on Schedule I, in the event that non-conventional stormwater management facilities are implemented on these lands, these lands shall be re-designated as Park without need for an amendment to this Plan, as per policy 7.7.5. In the event that no stormwater management facilities are required on these lands, they shall be re-designated as Park, without need for an amendment to this Plan, on condition that TRCA policies related to regulated natural features and natural hazards are satisfied where lands are located within TRCA Regulated areas."*

Concerns with VOP 2025 and VMCSP 2025

Five letters have been submitted to the City in response to the proposed designation of the Site for stormwater management purposes, spanning from September 2023 to May 2025. The letters contain our comments that the proposed designation is inappropriate for the lands and does not recognize the existing conditions of the Site which has no natural heritage significance and no potential contribution toward natural heritage based on the findings of a Natural Heritage Evaluation prepared by Pinchin. Additionally, we have continued to provide comments to the City that a developed and operating banquet hall providing jobs and an important amenity for the local community is not an appropriate location for parkland or stormwater management infrastructure as a sole use. But rather, that alternative stormwater solutions and public parkland can be provided as part of an integrated redevelopment solution for the Site.

The proposed designation of the Site unnecessarily limits the range of feasible development options and does not allow sufficient flexibility to respond to site-specific constraints and opportunities. It is also premature and inappropriate to plan the site exclusively for stormwater management or parkland purposes, in the absence of a completed technical study. We note that as part of its work on the VMCSP 2025, the City undertook a Functional Servicing Report for the City of Vaughan Integrated Urban Water Plan. The 2024 report prepared by Civica notes that there are serious feasibility concerns with the planned stormwater facility in the vicinity of the Site, advising that "*implementing a single SWM facility may not be feasible due to the complexity of the southeast quadrant*". As a result of these concerns, the report notes that the City has commenced a separate SWM study to "*assess various stormwater management measure options to establish a feasible SWM strategy for the VMC southeast quadrant*." Clearly, a feasible SWM strategy has not yet been developed for this area.

The Owners do not intend to stand in the way of that ongoing SWM study. Indeed, its consultants have been coordinating with the City's consultants through this process. However, it is clear that more work is required to determine what, if any, stormwater management facilities will be required on the Site. We understand that there are a wide range of alternative and creative stormwater management solutions that could be used on the Site which would also allow the Site to be redeveloped with urban uses. Further, even if the ongoing SWM study determines that the Site is not required for stormwater facilities, there is no basis to designate the Site for parkland purposes.

Instead, the Site should be assigned a land use designation that permits mixed-use development, including residential uses, in the event all or a portion of the Site is not required for stormwater management purposes.

This approach would allow for a redevelopment of the Site that provides open space and park uses, while contributing to the critical provincial objectives of supporting new housing and jobs.

On March 6, 2025, the Owners had a Pre-Application Consultation meeting with City Staff illustrating such a scheme. The proposal, shown in Figure 2 below, would allow for parkland dedication and privately-owned public space ("POPS") on the western portion of the Site, providing a signature open space complementing and supporting the Black Creek renewal, while also providing for a new 15-storey hotel and a 25-storey residential building with commercial uses at grade.

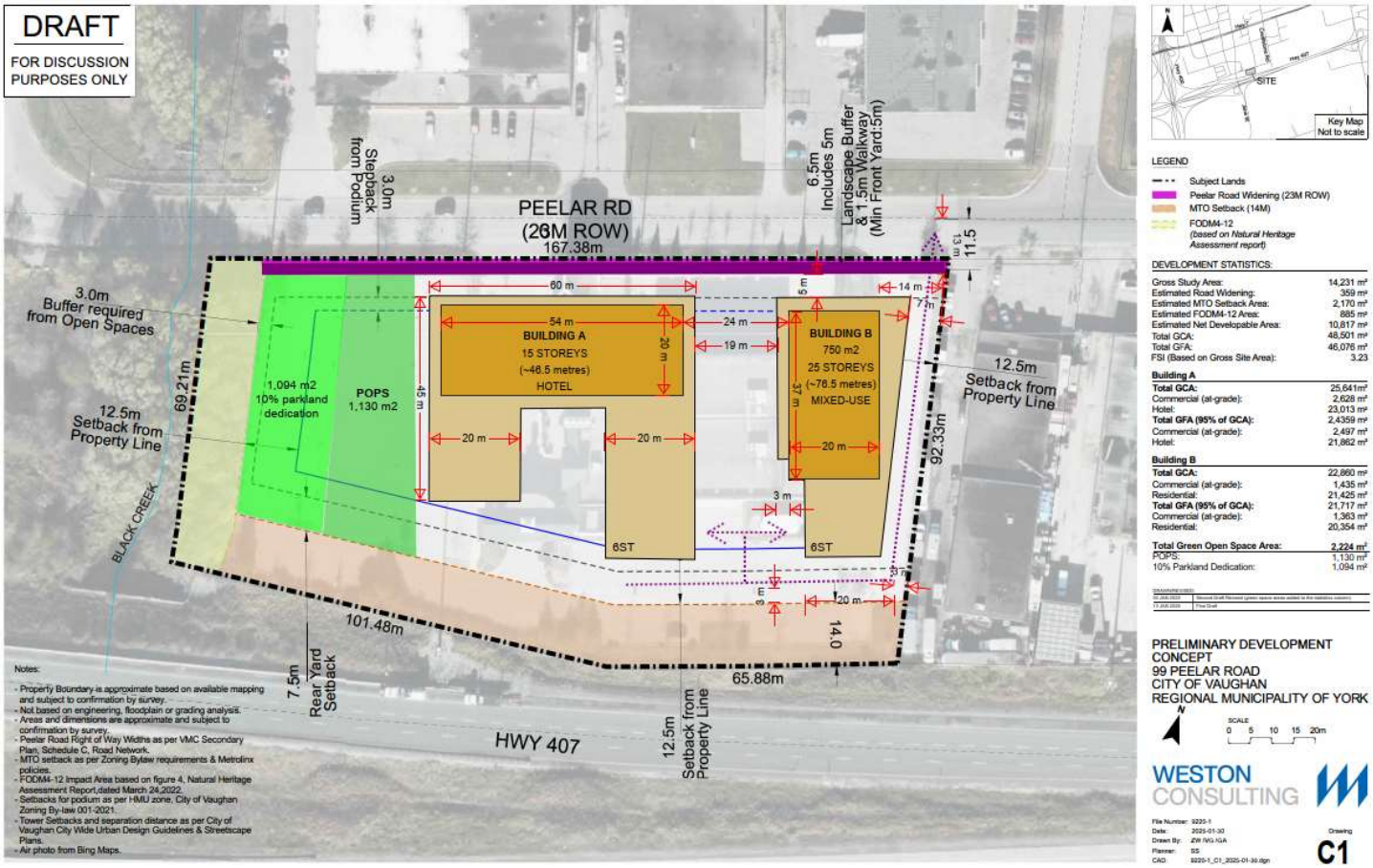


Figure 2: Preliminary Development Concept

A development scheme similar to that outlined above represents a much more efficient use of land, supporting job-generating uses and new housing in an appropriate location, while also providing new parkland and open space in a manner that complements Black Creek.

Requested Modifications

In light of the above, the Owners respectfully request the following modifications to the VOP 2025 and the VMCSP 2025:

1. ***VOP 2025 Mapping:*** Remove the Site from the *"Natural Areas and Agriculture"* designation on Schedule 1 – Urban Structure, leaving the Site designated as "*Strategic Growth Areas".*

2. ***VMCSP 2025 Mapping:*** Remove the Site from the "*Environmental Open Space*" designation on Schedule E – Parks and Open Spaces, redesignate the Site from "*Environmental Open Space*" to "*Mixed Use*" on Schedule G – Land Uses, and make corresponding modifications to Schedules B, C, D, F, H, I and J.

3. ***VMCSP 2025 Policy*****:** Policy 7.7.8 should be modified to provide that the underlying land use designation of "*Mixed Use"* would apply to the Site in the event that some or all of the lands are not required for stormwater management purposes. The required modifications are shown in strike out and red text below:

   > 7.7.8 Concerning ~~Environmental Open Space~~ lands identified as Special Policy Area on Schedule I, in the event that non-conventional stormwater management facilities are implemented on these lands, ~~these lands shall be re-designated as Park~~ the underlying land use designation in Schedule G shall apply without need for an amendment to this Plan~~, as per policy 7.7.5~~. In the event that no stormwater management facilities are required on these lands, ~~they shall be re-designated as Park~~ the underlying land use designation in Schedule G shall apply, without need for an amendment to this Plan, on condition that TRCA policies related to regulated natural features and natural hazards are satisfied where lands are located within TRCA Regulated areas.

We note that a similar policy approach to that reflected in the proposed modifications to policy 7.7.8 above are incorporated into other parts of the VMCSP 2025. See for example policy 6.7.1, which provides for underlying Mixed Use and Neighbourhood designations on Schedule G to come into force only when certain conditions relating to flood protection and improvements are met.

The VMCSP 2025's treatment of the Site inappropriately and prematurely identifies the Site as intended for stormwater management or park purposes, when the City has not yet done the work to justify such an approach. Together, the minor modifications outlined above would allow for the use of the lands for stormwater management purposes, if necessary, while recognizing that, if not required for such purposes, a mixed-use development would optimize the efficient use of land and better implement provincial and municipal policy objectives.

The modifications to the policy framework as proposed would support good planning by encouraging context-sensitive design, efficient land use, and the integration of contemporary stormwater management practices, while still achieving the City's objectives related to environmental protection and public safety.

We respectfully submit these comments for review and consideration as it relates to the Ministry's consideration of the VMCSP 2025 as included in the VOP 2025 and ask that the Ministry make the requested changes prior to issuing final approval of the VOP 2025 and VMCSP 2025.

Should you have any questions, or require any additional information please contact the undersigned at jdamaren@westonconsulting.com or smostacci@westonconsulting.com.

Yours truly,
Weston Consulting
Per:



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