February 1, 2026

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
16th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

Attention: **Matthew Meighoo**

Re: **New Vaughan Official Plan 2025**
3060 and 3080 King-Vaughan Road, City of Vaughan

1.0 Introduction

Primont 400 North Developments Inc. ("Primont") are the owners of the property municipally known as 3060 and 3080 King-Vaughan Road (herein referred to as the "Subject Site") in the City of Vaughan, shown in **Figure 1**. We are writing in regard to the New Vaughan Official Plan 2025 ("VOP 2025") which was adopted by Council on October 28, 2025 and submitted to the Ministry of Municipal Affairs and Housing for approval. VOP 2025 will implement the long-term vision and policy framework for Vaughan, to the year 2051. Previous letters submitted to City of Vaughan staff, dated March 3, 2025 and April 25, 2025, are included as appendices to this letter.

This letter serves to provide the Minister with our comments on VOP 2025 as it relates to the developability of the Subject Site and achieving the goals and policies of VOP 2025.

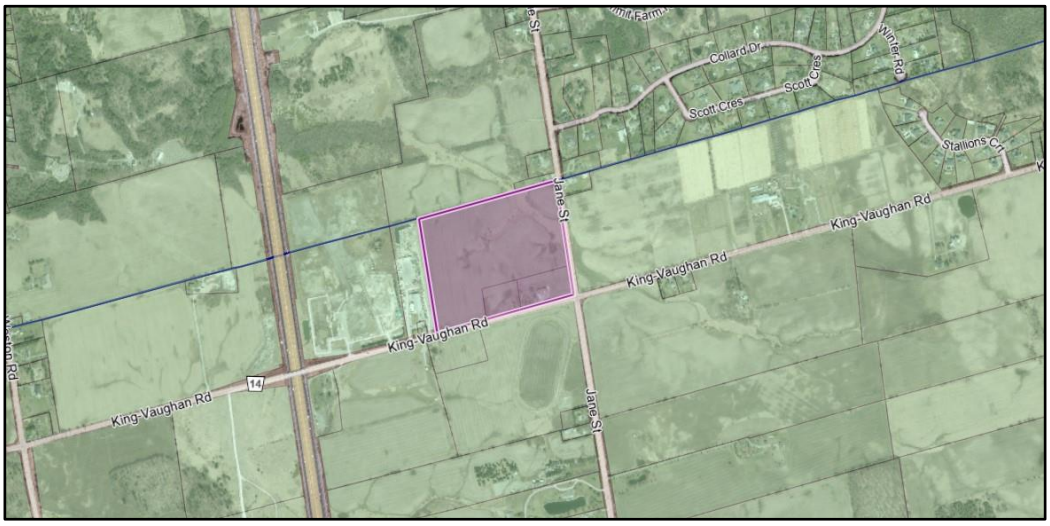


Figure 1: Aerial photo of the Subject Property (Source: York Maps, 2025)

2.0 SITE CONTEXT AND SURROUNDING CONTEXT

The Subject Site is located at the north-west corner of King-Vaughan Road and Jane Street and has a site area of approximately 18.2 hectares (44.95 acres). The Subject Site has a frontage of approximately 480 metres on King-Vaughan Road and 379 metres on Jane Street. The site is currently vacant and contains a portion of the East Humber River towards the north-east portion of the site. The Subject Site is currently located in the Urban Boundary and subject to the Highway 400 North Employment Lands Secondary Plan under the Vaughan Official Plan 2010. Under the York Region Official Plan 2022 (YROP, 2022), Subject Site 1 is designated "Community Area" on Map 1A – Land Use Designations.

The land uses surrounding the Subject Site include agricultural lands along with a detached dwelling to the north. South of the site is King-Vaughan Road. On the south side of King-Vaughan Road there are agricultural lands with detached dwellings. To the immediate east of the site is Jane Street. On the east side of Jane Street there are agricultural lands and an active development application (OP.25.001 and Z.25.002) for a low-rise residential development comprised of 152 street townhouses, 74 detached dwellings, 3 low-rise development blocks and 1 future development block on the northeast corner of King-Vaughan Road and Jane Street. Directly west of the site consists of multiple businesses, including a construction and aggregate company and a paving company. Further west of the site is Highway 400.

It should be noted, as shown in **Figures 3, 4 and 5** below, the majority of lands surrounding the site are within the Urban Boundary or will be added as part of VOP 2025, and are identified as "Community Areas" and "Employment Areas" based on approved regional employment conversions.

Highway 413

The site is located outside of the Preliminary Highway Right-of-Way and appears to be outside of the Corridor Management Permit Control Area – Building and Land Use, (as shown in **Figure 2**), and as such, will not be considered for potential route location.

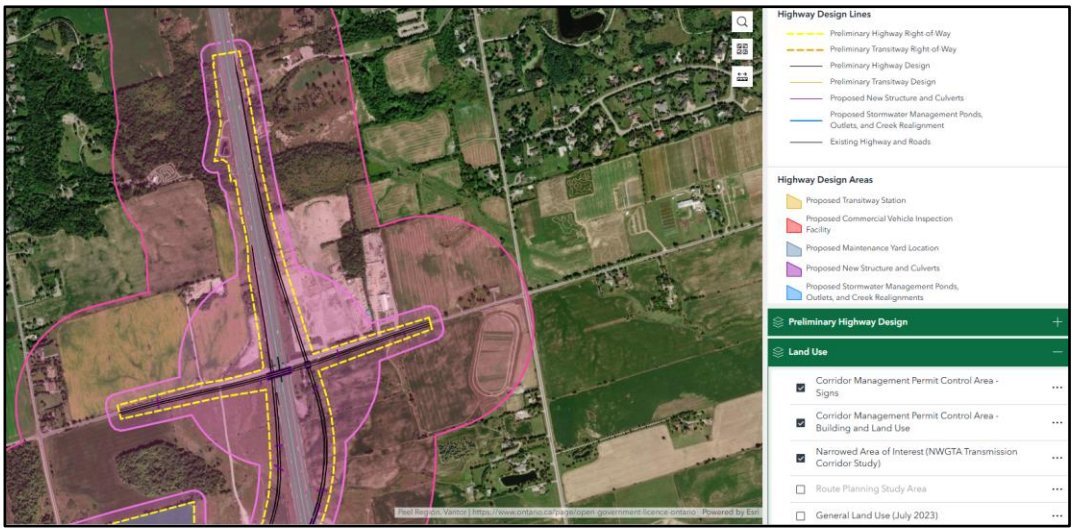


Figure 2: Highway 413 Project Route Planning Study Area (Source: Highway 413 Interactive Map)

3.0 SUBJECT SITE IN VOP 2025

The Subject Site is identified as “Community Areas” and “Natural Areas and Agriculture” On VOP 2025 Schedule 1 – Urban Structure, with VOP 2025 Schedule 1A – Urban Area, identifying the Subject Site as within a “Designated Greenfield Area” and Appendix 1 identifying the site as an “Approved Regional Employment Conversion” as shown on **Figure 5**.

As per Section 3.2.10, lands marked “Approved Regional Employment Conversions” on Appendix 1 are identified as Community Areas on Schedule 1 – Urban Structure, and designated “Future Development (Non-Employment) on Schedule 13 – Land Use or subject to the policies of a Secondary Plan or Area-Specific Plan. The Subject Site is within the Highway 400 North Employment Secondary Plan as shown on Schedule 13 – Land Use.

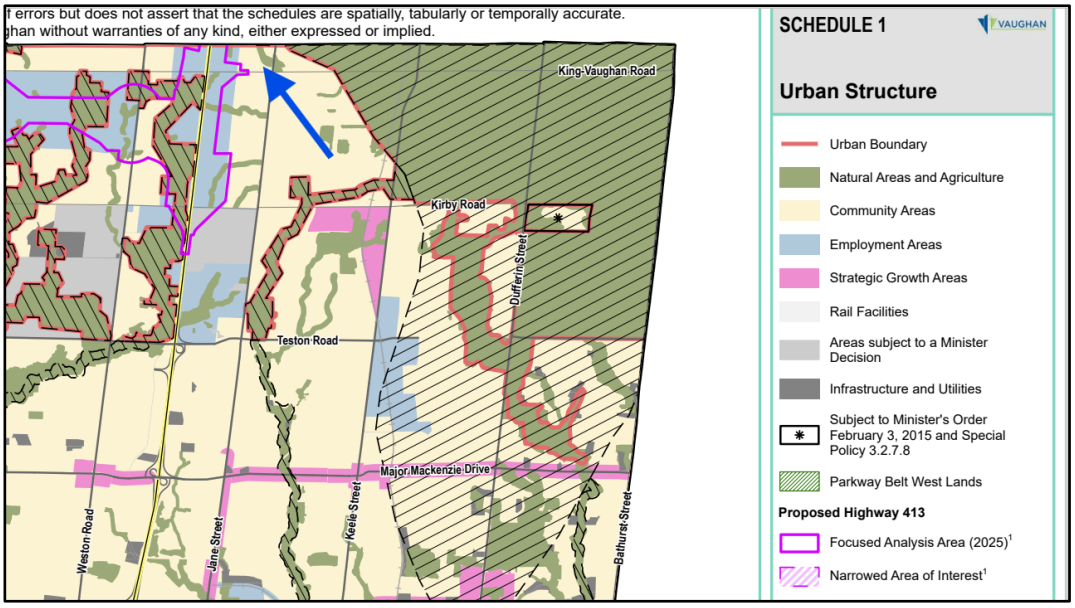


Figure 3: Excerpt from Schedule 1: Urban Structure (Source: City of Vaughan)

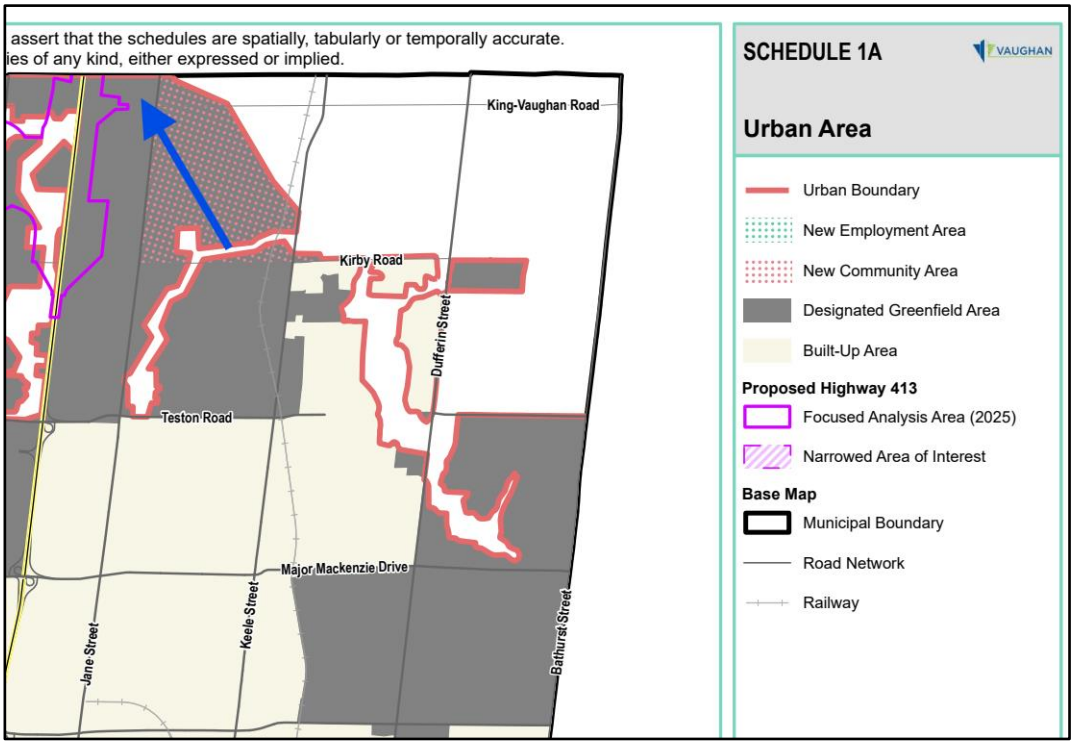


Figure 4: Excerpt from Draft Schedule 1B: Urban Area (Source: City of Vaughan)

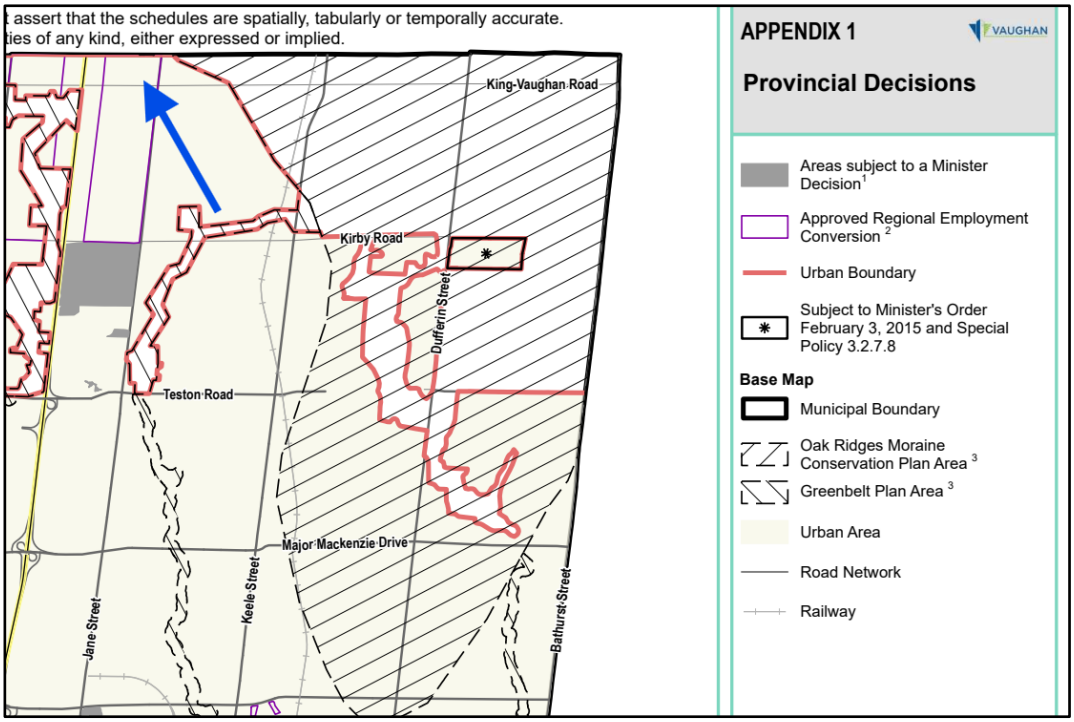


Figure 5: Excerpt from Appendix 1: Provincial Decisions (Source: City of Vaughan)

4.0 VOP 2025 COMMENTS

The following sections outline our comments on VOP 2025 as it relates to the developability of the Subject Site.

Comment #1: Privately Led Secondary Plan Processes

We would like to see VOP 2025 allow and encourage privately led Secondary Plans. As per Policy 5.1.1.5, it notes that Secondary Plans shall be prepared by the City. It should be noted that the Subject Site is part of the Block 35 Landowners Group, and through discussions with the City, a privately led Secondary Plan is being advanced.

Privately led Secondary Plans have advantages to the City in terms of managing costs and more effectively managing City resources. As such, we would like VOP 2025 to reflect these privately led planning processes that are consistent with the *Planning Act* which does not restrict privately led applications. The following sections of VOP 2025 could be revised accordingly with the proposed redlines below:

- Policy 5.1.1.1 "That the City may pass City-led and/or privately led Secondary Plans, to be included in ..."
- Policy 5.1.1.5: "That Secondary Plans shall be prepared by the City and/or participating property owners in consultation with the public, pursuant to the policies of Section 5.1.1 of this Plan."

Comment #2: Housing Affordability

We support the intent behind the affordable housing target; however, we respectfully submit the following comments:

A. <u>Implementation Framework & Administrative Clarity</u>

At this time, we do not understand how the City intends to administer and implement the affordable housing targets presented in Policy 4.1.1.1 of VOP 2025. It would be helpful to understand how the 20% target will be monitored and enforced. A clearly defined implementation strategy would ensure transparency and consistency.

B. <u>Municipal Tools</u>

While Primont supports the delivery of affordable housing, it is important to acknowledge that achieving meaningful affordability outcomes often depends on tools and incentives. These include:

- Reductions in development charges and municipal fees;
- Reductions or exemptions in government taxes and fees;
- Assigning Community Benefit Charges to affordable housing; and,
- Expecting and streamlining approval timelines.

We acknowledge that on November 19, 2024, Vaughan Council adopted numerous options to reduce and defer development charges in order to address affordability.

Without a variety of these supports - which are tools beyond the control of VOP 2025 – it will be challenging to achieve a 20% affordable housing target.

C. <u>Policy Language</u>

We propose the following modification in red to Policy 4.1.1.1(a) to clarify that the affordable housing target should not be interpreted or enforced on a per-application basis, especially for small-scale infill developments that may not be able to accommodate such requirements due to site-specific constraints:

"… that a minimum of 20% of all new housing units in Vaughan are encouraged to be Affordable Housing as applied as a city-wide target."

While we are generally supportive of policy to provide diverse housing options in Vaughan, the target identified should be a "supportive" and not a "directive" policy and would therefore not be applicable to every individual development or phases of development. This adjustment would allow for a more balanced and realistic implementation pathway, while still advancing the City's affordability objectives.

5.0 CONCLUSION

In summary, it is our respectful position that the VOP 2025 be modified by the Minister to reflect the following comments:

1. Allow and encourage privately led Secondary Plans; and,
2. Modify Policy 4.1.1.1 to encourage, rather than compel, all developments in Vaughan to provide a minimum affordable housing target of 20%.

We request that Primont's position outlined above be reviewed and considered and that the proposed modifications be incorporated in the Council-adopted VOP 2025.

Thank you for your detailed review and consideration of this request. If you have any questions regarding the above comments, please contact the undersigned at (416) 953-7231 or at a.lopes@primont.com.

Yours sincerely,

Armando Lopes

Armando Lopes
Director of Development
Primont 400 North Developments Inc.

Appendix A: Letter to Fausto Filipetto, Project Manager, City of Vaughan, dated March 3, 2025
Appendix B: Letter to Fausto Filipetto, Project Manager, City of Vaughan, dated April 25, 2025

March 3, 2025

City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Attention: **Fausto Filipetto, Project Manager**

Re: **Draft New Vaughan Official Plan 2025**
3060 and 3080 King-Vaughan Road and 12746 Jane Street, City of Vaughan

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Dear Mr. Filipetto,

Primont 400 North Developments Inc. and North Jane Investments Inc. ("Primont") are the owners of the properties municipally known as 3060 and 3080 King-Vaughan Road (herein referred to as "Subject Site 1") and 12746 Jane Street (herein referred to as "Subject Site 2") in the City of Vaughan, shown in **Figure 1**. We are writing in regard to the Draft New Vaughan Official Plan 2025 ("Draft VOP 2025") which will implement the long-term vision for Vaughan, to the year 2051. This letter serves to provide the City with our comments on the Draft VOP 2025 as it relates to the developability of the subject properties.



Figure 1: Aerial photo of the Subject Properties (Source: Google Earth)

SITE CONTEXT AND SURROUNDING CONTEXT

Subject Site 1: 3060 and 3080 King-Vaughan Road

Subject Site 1 is located at north-west corner of King-Vaughan Road and Jane Street and has a site area of approximately 18.2 hectares (44.95 acres). The site has a frontage of approximately 480 metres on King-Vaughan Road and 379 metres on Jane Street. The site is currently vacant and contains a portion of the East Humber River towards the north-east portion of the site. Subject Site 1 is currently located in the Urban Boundary and subject to the Highway 400 North Employment Lands Secondary Plan under the Vaughan Official Plan 2010. Under the York Region Official Plan 2022 (YROP, 2022), Subject Site 1 is designated "Community Area" on Map 1A – Land Use Designations.

The land uses surrounding Subject Site 1 include agricultural lands along with a detached dwelling to the north. South of the site is King-Vaughan Road. On the south side of King-Vaughan Road there are agricultural lands with detached dwellings. To the immediate east of the site is Jane Street. On the east side of Jane Street there are agricultural lands and an active development application for 226 townhouse dwellings on the northeast corner of King-Vaughan Road and Jane Street. Directly west of the site consists of multiple businesses, including a construction and aggregate company and a paving company. Further west of the site is Highway 400.

It should be noted, as shown in **Figures 3, 4 and 6** below, the majority of lands surrounding the site are within the Urban Boundary or will be added as part of Draft VOP 2025, and are identified as "Core Employment Areas", "New Community Areas" or "Community Areas" based on approved regional employment conversions.

Subject Site 2: 12746 Jane Street

Subject Site 2 is located south-east of the intersection of King-Vaughan Road and Jane Street, and has a site area of approximately 19.95 hectares (49.3 acres), with a frontage of approximately 206 metres on Jane Street. Site 2 is currently vacant, with a portion of the East Humber River located towards the rear of the site. As discussed further on, Subject Site 2 will be located within the Urban Boundary as a New Community Area in the Draft VOP 2025. Under the YROP 2022, Subject Site 2 is designated "Community Area" on Map 1A – Land Use Designations.

The land uses surrounding Subject Site 2 include agricultural lands and King-Vaughan Road to the north of the site. Directly south and abutting the site is a woodlot, agricultural lands and a detached dwelling. To the east are agricultural lands. West of the site is Jane Street. On the west side of Jane site are agricultural lands, detached dwellings and Highway 400.

It should be noted, as shown in **Figures 3, 4 and 6** below, the majority of lands surrounding the site are within the Urban Boundary or will be added as part of Draft VOP 2025, and are identified as "Core Employment Areas", "New Community Areas" or "Community Areas" based on approved regional employment conversions.

Highway 413

Both sites are located outside of the Highway 413 Project Study Route (as shown in **Figure 2**), and as such, will not be considered for potential route location. However, a small portion of the southwest corner of Subject Site 1 is identified within the Focused Analysis Area and is expected to accommodate a future road widening along King-Vaughan Road.



Figure 2: Highway 413 Project Route Planning Study Area (Source: Highway 413 Interactive Map)

DRAFT VOP 2025 COMMENTS

The following sections outline our comments on the Draft VOP 2025 as it relates to the developability of the subject properties. Within the Draft VOP 2025 Schedule 1 – Urban Structure, Subject Site 1 is identified as "Supporting Employment Area" and "Natural Areas and Countryside". Furthermore, Subject Site 2 is identified as "Community Area" and "Natural Areas and Countryside", as shown in **Figure 3**.

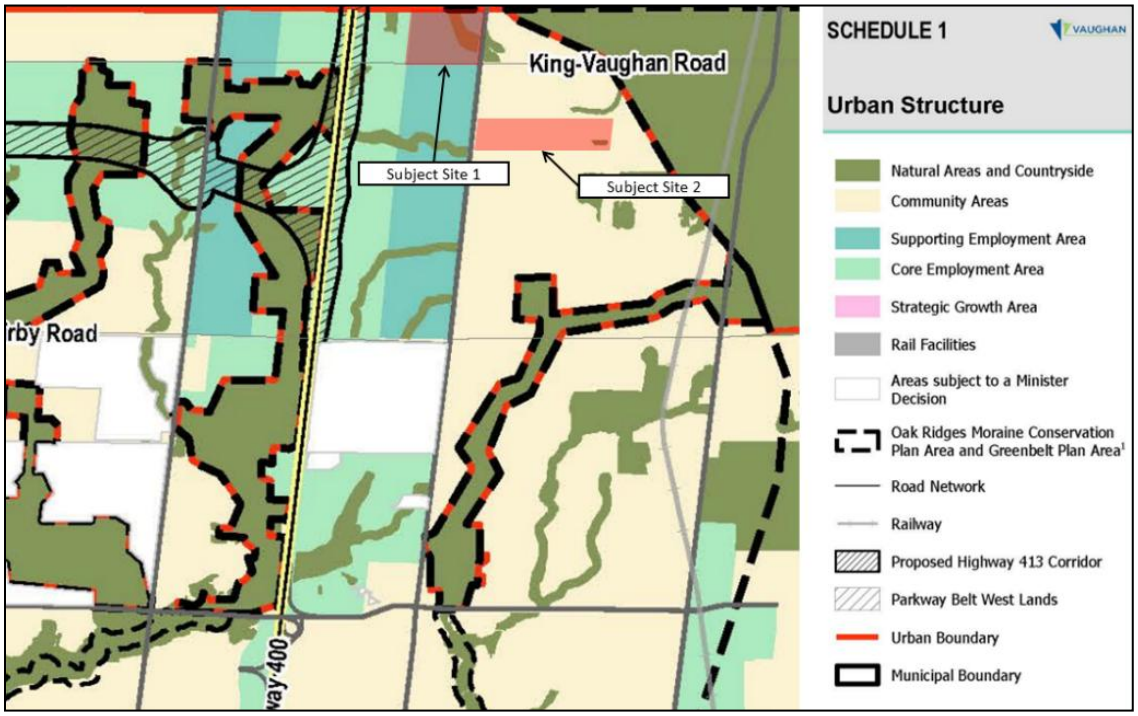


Figure 3: Excerpt from Draft Schedule 1: Urban Structure (Source: City of Vaughan)

Comment #1: Revise Schedule 1 – Urban Structure

On Draft VOP 2025 Schedule 1 – Urban Structure, Subject Site 1 is identified as "Supporting Employment Area" and "Natural Areas and Countryside", with Appendix 1 identifying the site as an "Approved Regional Employment Conversion" as shown on **Figure 4**.

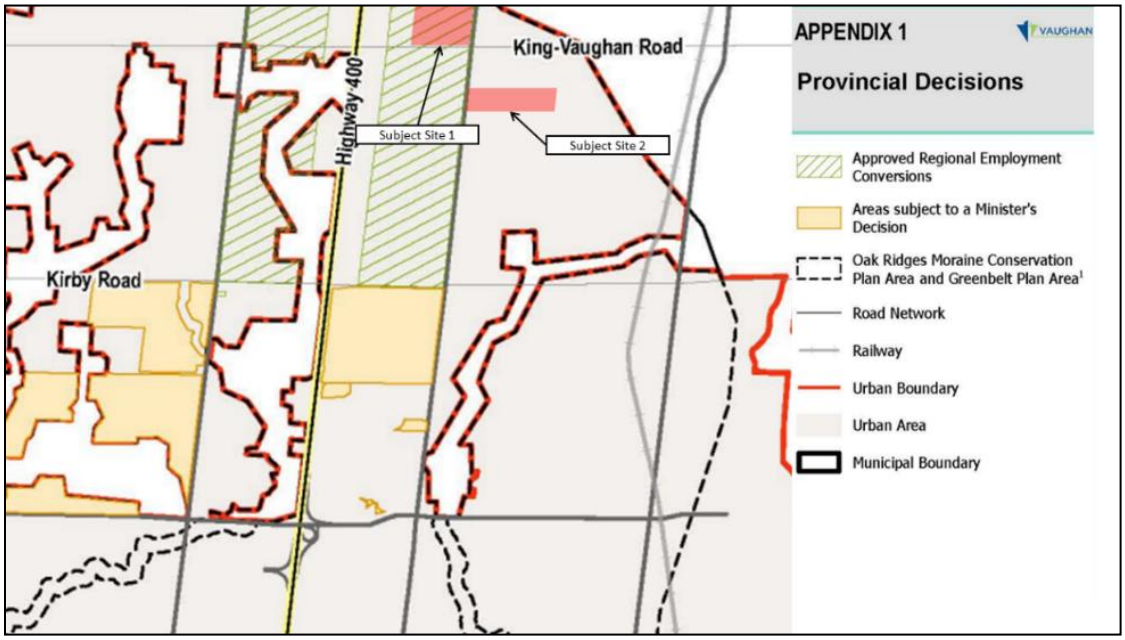


Figure 4: Excerpt from Draft Appendix 1: Provincial Decisions (Source: City of Vaughan)

As per draft Policy 2.2.4.5, lands marked "Approved Regional Employment Conversions" on Appendix 1 are considered to be part of the City's Community Areas, but will require redesignation through an official plan amendment to an appropriate land use designation.

Given that the site is designated "Community Area" under the YROP, 2022 and it is the City's intention that these lands are to be part of the City's Community Area, we request that Subject Site 1's designation on Schedule 1 be revised to reflect a base of "Community Area" and "Natural Areas and Countryside" with the "Approved Regional Employment Conversion" overlay. This change would align with the previous Official Plan Review Project and the Draft #1 of the Comprehensive Official Plan Amendment released in June 2024, as shown in **Figure 5**.

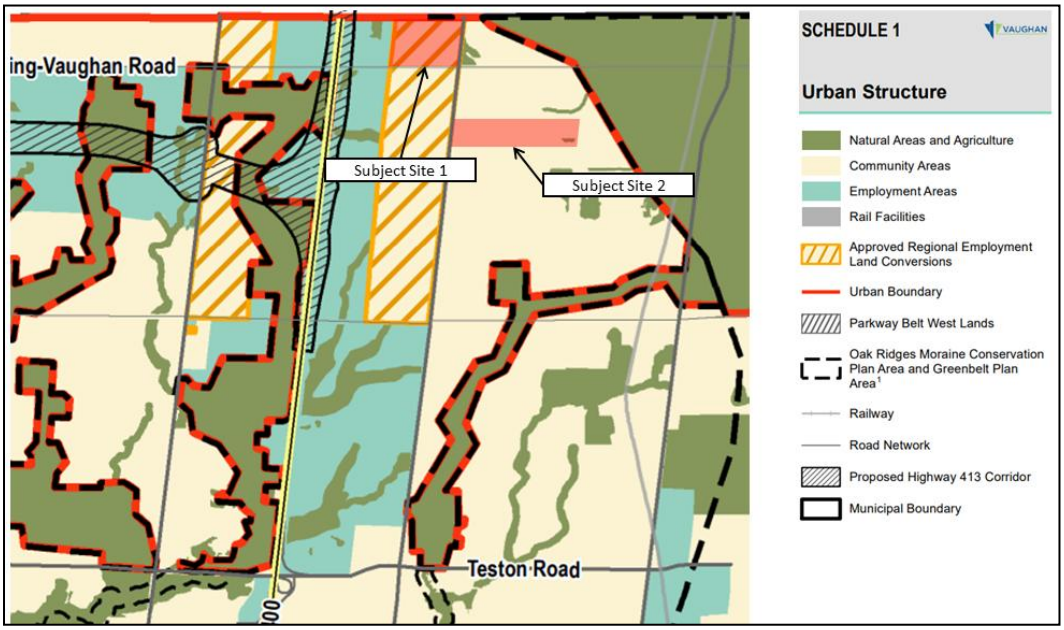


Figure 5: Excerpt from June 2024 Draft #1 of the Comprehensive OPA Schedule 1: Urban Structure (Source: City of Vaughan, June 2024)

Comment #2: Delete Draft Policy 2.3.1.5

On Draft VOP 2025 Schedule 1B – Urban Area, Subject Site 2 is identified as a "Designated Greenfield Area" and "New Community Area", as shown on **Figure 6**.

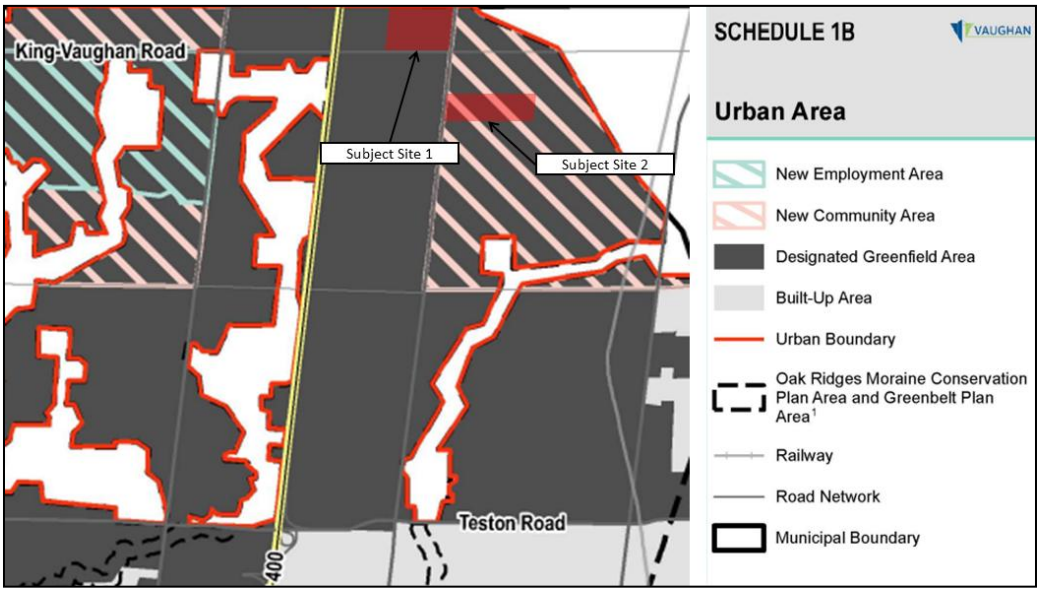


Figure 6: Excerpt from Draft Schedule 1B: Urban Area (Source: City of Vaughan)

Section 2.3 of the Draft VOP 2025 provides policies related to phasing growth in New Community Areas. Draft Policy 2.3.1.4 requires that greenfield development is supported by water and wastewater expansions; be guided by new Secondary Plans or updates to existing Secondary Plans; and will proceed in a phased manner alongside the development of infrastructure and provision of services.

Draft Policy 2.3.1.5 provides the additional phasing criteria:

2.3.1.5 That Development in New Community Areas or New Employment Areas will not occur until adjacent Community Areas or Employment Areas have achieved their minimum density targets.

It is our opinion that draft Policy 2.3.1.4 is sufficient in ensuring the orderly development of New Community Areas. Draft Policy 2.3.1.5 adds an additional policy that is broad and can have the effect of delaying development on Subject Site 2 until the surrounding lands have achieved their minimum targets. It is unclear how the City defines "adjacent" in this policy context and how the achievement of density targets will be tracked.

As per draft Policy 2.1.2.2 (e), the density target for "Designated Greenfield Areas" is 70 combined residents and jobs per hectare in the developable area. Securing the achievement of this density target is more in the purview of the municipality, as the City will need to ensure that surrounding development applications are appropriately working towards this target as adjacent landowners are no longer able to appeal neighbouring development applications. Additionally, this policy is unreasonable as it ties the development in New Community Areas to other landowner's development timelines which may delay the normal progression of urban development contemplated by this Plan. As such, we request that draft Policy 2.3.1.5 be deleted from the Draft VOP 2025.

Comment #3: Clarification on the Draft VOP 2025 and YROP, 2022

We would like to seek clarification on the Draft VOP 2025 process and how the YROP, 2022 will be integrated. *Planning Act* changes brought forward through Bill 23, *More Homes Built Faster Act, 2022* resulted in the rescindment of planning responsibilities from several upper-tier municipalities, including York Region, which is now considered an upper-tier municipality without planning responsibilities. As such, the YROP, 2022 is now considered a local official plan.
We request clarification as to how the YROP, 2022 will be considered in the Draft VOP 2025. Will the official plan documents be merged as one document or will they be implemented separately?

Comment #4: Privately Led Secondary Plan Processes

We would like to see the draft VOP 2025 allow and encourage privately led Secondary Plans. As per draft Policy 5.1.1.5 and the explanatory note on page 323, it notes that Secondary Plans shall be prepared by the City or are City-led planning exercises. It should be noted that Subject Site 1 is part of the Block 35 Landowners Group, and through discussions with the City, a privately led Secondary Plan is being advanced. It is also our intention, once a landowners group is finalized, that Subject Site 2 be subject to a privately led Secondary Plan process.

Privately led Secondary Plans have advantages to the City in terms of managing costs and more effectively managing City resources. As such, we would like the draft VOP 2025 to reflect these privately led planning processes that are consistent with the *Planning Act,* which does not restrict privately led applications. The following sections of the draft VOP 2025 should be revised accordingly with the proposed redlines below:

- Section 5.1.1 Detailed Planning, 1st paragraph, 2nd sentence: "Council may adopt City-led and/or privately led Secondary Plans, to be included in ..."
- Policy 5.1.1.5: "That Secondary Plans shall be prepared by the City and/or participating property owners in consultation with the public, pursuant to the policies of Section 5.1.2 of this Plan."
- Secondary Plans vs. Block Plans Explanatory Note on page 323: "Secondary Plans are City-led and/or privately led planning exercises which form …"

CONCLUSION

In summary, it is our respectful position that the Draft VOP 2025 be amended to reflect the following comments:

1. Revise Subject Site 1's designation on Schedule 1 to reflect a base of "Community Area" and "Natural Areas and Countryside" with the "Approved Regional Employment Conversion" overlay;

2. Delete draft Policy 2.3.1.5 as it is broad and can have the effect of delaying development in New Community Areas;

3. Provide clarification on how the YROP, 2022 will be integrated into the Draft VOP 2025; and,

4. Allow and encourage privately led Secondary Plans.

We request that Primont's position outlined above be reviewed and considered. We would also like to reserve the right to provide further comments on the policies and/or schedules of the Draft VOP 2025, as it relates to the future development of the subject properties. We respectfully request to be notified of any future reports, public meetings, and decisions in relation to this matter.

Thank you for your detailed review and consideration of this request. If you have any questions regarding the above comments, please contact the undersigned at (416) 797- 8967 or at ian@primont.com

Yours sincerely,

Ian MacPherson

Ian G. MacPherson, P.Eng
Vice President, Land Development
Primont 400 North Developments Inc. and North Jane Investments Inc.

cc: Daniel Bedford, Assistant Development Manager, Primont

April 25, 2025

City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Attention: **Fausto Filipetto, Project Manager**

Re: **Draft New Vaughan Official Plan 2025**
3060 and 3080 King-Vaughan Road and 12746 Jane Street, City of Vaughan

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Figure 1: Aerial photo of the Subject Properties (Source: Google Earth)

SITE CONTEXT AND SURROUNDING CONTEXT

Subject Site 1: 3060 and 3080 King-Vaughan Road

Subject Site 1 is located at north-west corner of King-Vaughan Road and Jane Street and has a site area of approximately 18.2 hectares (44.95 acres). The site has a frontage of approximately 480 metres on King-Vaughan Road and 379 metres on Jane Street. The site is currently vacant and contains a portion of the East Humber River towards the north-east portion of the site. Subject Site 1 is currently located in the Urban Boundary and subject to the Highway 400 North Employment Lands Secondary Plan under the Vaughan Official Plan 2010. Under the York Region Official Plan 2022 (YROP, 2022), Subject Site 1 is designated "Community Area" on Map 1A – Land Use Designations.

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It should be noted, as shown in **Figures 3, 4 and 6** below, the majority of lands surrounding the site are within the Urban Boundary or will be added as part of Draft VOP 2025, and are identified as "Core Employment Areas", "New Community Areas" or "Community Areas" based on approved regional employment conversions.

Subject Site 2: 12746 Jane Street

Subject Site 2 is located south-east of the intersection of King-Vaughan Road and Jane Street, and has a site area of approximately 19.95 hectares (49.3 acres), with a frontage of approximately 206 metres on Jane Street. Site 2 is currently vacant, with a portion of the East Humber River located towards the rear of the site. As discussed further on, Subject Site 2 will be located within the Urban Boundary as a New Community Area in the Draft VOP 2025. Under the YROP 2022, Subject Site 2 is designated "Community Area" on Map 1A – Land Use Designations.

The land uses surrounding Subject Site 2 include agricultural lands and King-Vaughan Road to the north of the site. Directly south and abutting the site is a woodlot, agricultural lands and a detached dwelling. To the east are agricultural lands. West of the site is Jane Street. On the west side of Jane site are agricultural lands, detached dwellings and Highway 400.

It should be noted, as shown in **Figures 3, 4 and 6** below, the majority of lands surrounding the site are within the Urban Boundary or will be added as part of Draft VOP 2025, and are identified as "Core

Employment Areas", "New Community Areas" or "Community Areas" based on approved regional employment conversions.

Highway 413

Both sites are located outside of the Highway 413 Project Study Route (as shown in **Figure 2**), and as such, will not be considered for potential route location. However, a small portion of the southwest corner of Subject Site 1 is identified within the Focused Analysis Area and is expected to accommodate a future road widening along King-Vaughan Road.



Figure 2: Highway 413 Project Route Planning Study Area (Source: Highway 413 Interactive Map)

DRAFT VOP 2025 COMMENTS

The following sections outline our comments on the Draft VOP 2025 as it relates to the developability of the subject properties. Within the Draft VOP 2025 Schedule 1 – Urban Structure, Subject Site 1 is identified as "Supporting Employment Area" and "Natural Areas and Countryside". Furthermore, Subject Site 2 is identified as "Community Area" and "Natural Areas and Countryside", as shown in **Figure 3**.

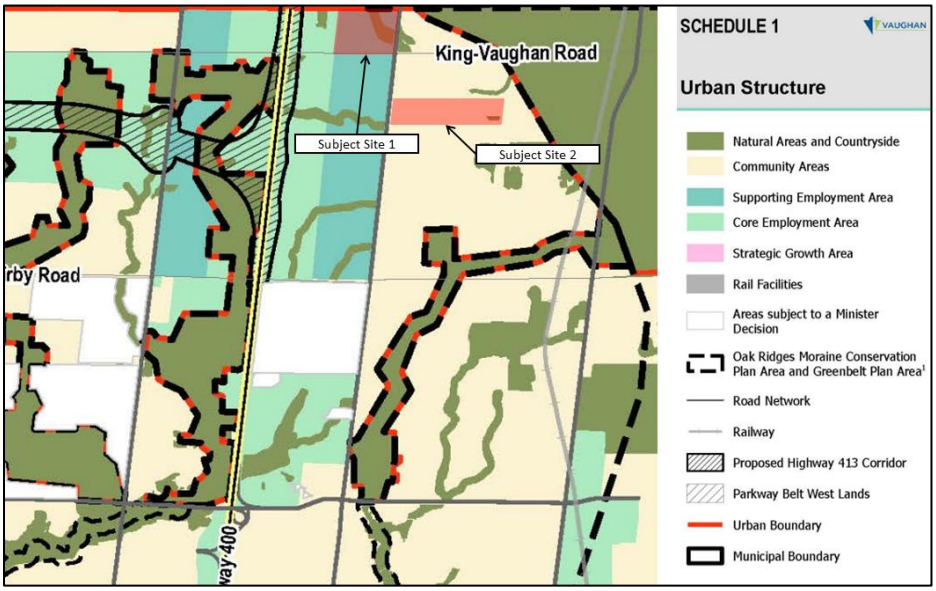


Figure 3: Excerpt from Draft Schedule 1: Urban Structure (Source: City of Vaughan)

Comment #1: Revise Schedule 1 – Urban Structure

On Draft VOP 2025 Schedule 1 – Urban Structure, Subject Site 1 is identified as "Supporting Employment Area" and "Natural Areas and Countryside", with Appendix 1 identifying the site as an "Approved Regional Employment Conversion" as shown on **Figure 4**.

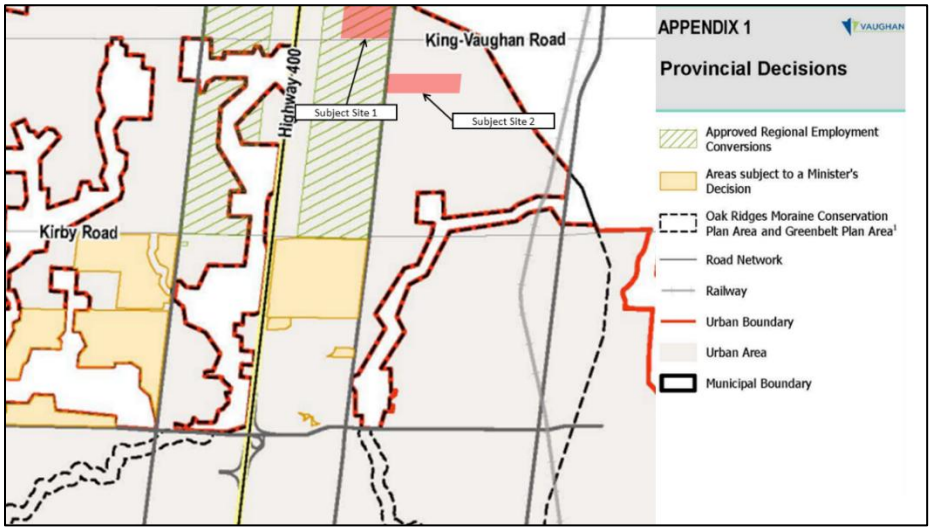


Figure 4: Excerpt from Draft Appendix 1: Provincial Decisions (Source: City of Vaughan)

As per draft Policy 2.2.4.5, lands marked "Approved Regional Employment Conversions" on Appendix 1 are considered to be part of the City's Community Areas, but will require redesignation through an official plan amendment to an appropriate land use designation.

Given that the site is designated "Community Area" under the YROP, 2022 and it is the City's intention that these lands are to be part of the City's Community Area, we request that Subject Site 1's designation on Schedule 1 be revised to reflect a base of "Community Area" and "Natural Areas and Countryside" with the "Approved Regional Employment Conversion" overlay. This change would align with the previous Official Plan Review Project and the Draft #1 of the Comprehensive Official Plan Amendment released in June 2024, as shown in **Figure 5**.

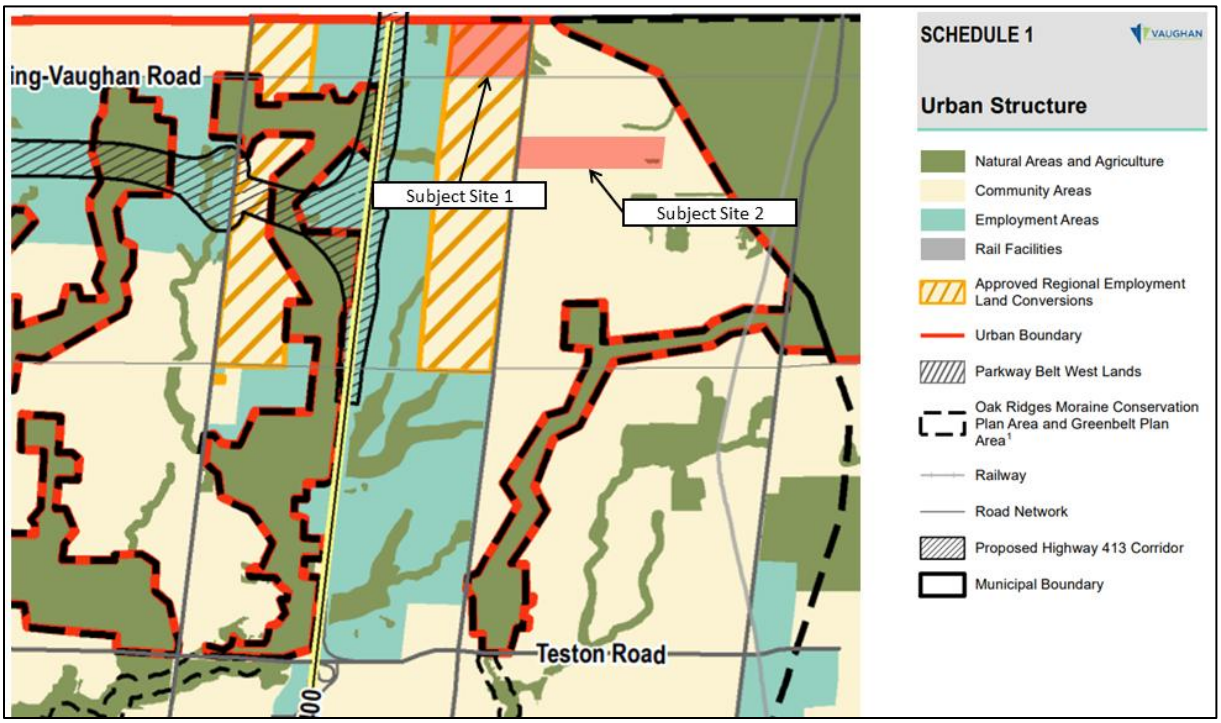


Figure 5: Excerpt from June 2024 Draft #1 of the Comprehensive OPA Schedule 1: Urban Structure (Source: City of Vaughan, June 2024)

Comment #2: Delete Draft Policy 2.3.1.5

On Draft VOP 2025 Schedule 1B – Urban Area, Subject Site 2 is identified as a "Designated Greenfield Area" and "New Community Area", as shown on **Figure 6**.

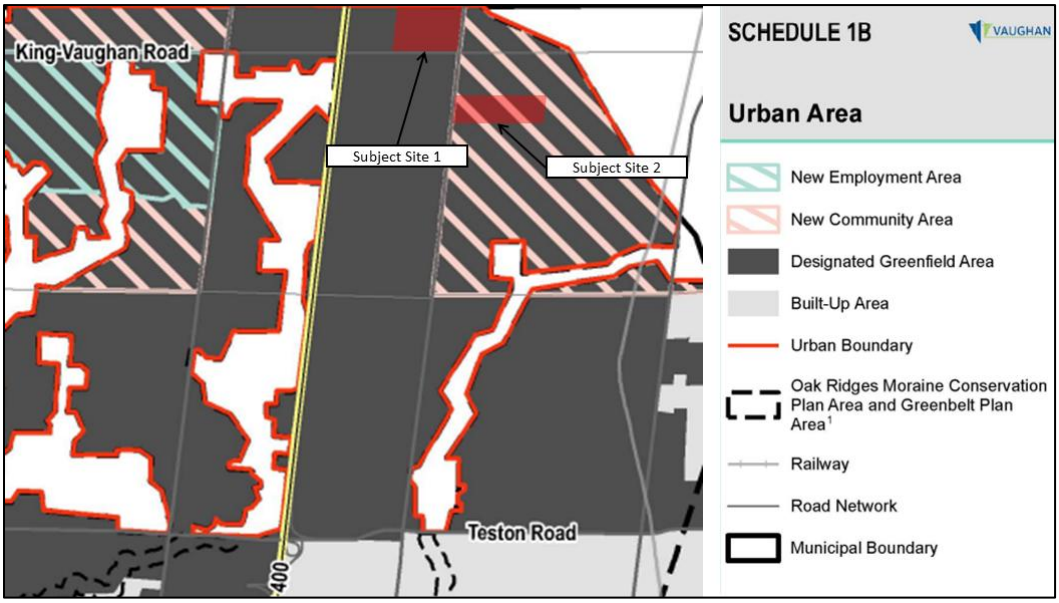


Figure 6: Excerpt from Draft Schedule 1B: Urban Area (Source: City of Vaughan)

Section 2.3 of the Draft VOP 2025 provides policies related to phasing growth in New Community Areas. Draft Policy 2.3.1.4 requires that greenfield development is supported by water and wastewater expansions; be guided by new Secondary Plans or updates to existing Secondary Plans; and will proceed in a phased manner alongside the development of infrastructure and provision of services.

Draft Policy 2.3.1.5 provides the additional phasing criteria:

2.3.1.5 That Development in New Community Areas or New Employment Areas will not occur until adjacent Community Areas or Employment Areas have achieved their minimum density targets.

It is our opinion that draft Policy 2.3.1.4 is sufficient in ensuring the orderly development of New Community Areas. It is consistent with the Provincial Planning Statement, 2024 (PPS 2024), where Policy 2.3.1.5 of the PPS 2024 encourages municipalities to establish phasing policies "to ensure that development within designated growth areas is orderly and aligns with the timely provision of infrastructure and public service facilities".

Draft Policy 2.3.1.5 of VOP 2025 adds an additional policy that is broad and can have the effect of delaying development on Subject Site 2 until the surrounding lands have achieved their minimum targets. It is unclear how the City defines "adjacent" in this policy context and how the achievement of density targets will be tracked. For example, what percent of the minimum density targets do the adjacent areas need to achieve before development can occur, is the achievement of targets based off planning approvals or build-outs, etc.?

Furthermore, draft Policy 2.3.1.5 is based on a test from the Provincial Policy Statement, 2020 (former Policy 1.1.3.7a) that is no longer in effect. The proposed policy contemplates an additional restriction on the timing of development that is not within the control of the developer community, but within the control of the City to enforce through individual development applications. As such, we request that draft Policy 2.3.1.5 be deleted from the Draft VOP 2025 as it is not consistent with the PPS 2024. As per PPS 2024 Policy 6.1.5, it is our opinion that the draft policy is not attainable for the reasons set out in this Section.

As per draft Policy 2.1.2.2 (e), the density target for "Designated Greenfield Areas" is 70 combined residents and jobs per hectare in the developable area. It is not clear if this will be the target for all portions of New Community Areas and New Employment Areas. For example, employment areas and community areas can sometimes have different densities. Securing the achievement of density targets is more in the purview of the municipality, as the City will need to ensure that surrounding development applications are appropriately working towards the targets as adjacent landowners are no longer able to appeal neighbouring development applications. Additionally, this policy is unreasonable as it ties the development in New Community Areas to other landowner's development timelines which may delay the normal progression of urban development contemplated by this Plan.

In conclusion, we request that draft Policy 2.3.1.5 be deleted from the Draft VOP 2025. It is too broad, can have the effect of delaying development and is inconsistent with the PPS 2024.

Comment #3: Clarification on the Draft VOP 2025 and YROP, 2022

We would like to seek clarification on the Draft VOP 2025 process and how the YROP, 2022 will be integrated. *Planning Act* changes brought forward through Bill 23, *More Homes Built Faster Act, 2022* resulted in the rescindment of planning responsibilities from several upper-tier municipalities, including York Region, which is now considered an upper-tier municipality without planning responsibilities. As such, the YROP, 2022 is now considered a local official plan.

We request clarification as to how the YROP, 2022 will be considered in the Draft VOP 2025. Will the official plan documents be merged as one document or will they be implemented separately?

Comment #4: Privately Led Secondary Plan Processes

We would like to see the draft VOP 2025 allow and encourage privately led Secondary Plans. As per draft Policy 5.1.1.5 and the explanatory note on page 323, it notes that Secondary Plans shall be prepared by the City or are City-led planning exercises. It should be noted that Subject Site 1 is part of the Block 35 Landowners Group, and through discussions with the City, a privately led Secondary Plan is being advanced. It is also our intention, once a landowners group is finalized, that Subject Site 2 be subject to a privately led Secondary Plan process.

Privately led Secondary Plans have advantages to the City in terms of managing costs and more effectively managing City resources. As such, we would like the draft VOP 2025 to reflect these privately led planning processes that are consistent with the *Planning Act* which does not restrict privately led applications. The following sections of the draft VOP 2025 should be revised accordingly with the proposed redlines below:

- Section 5.1.1 Detailed Planning, 1st paragraph, 2nd sentence: "Council may adopt City-led and/or privately led Secondary Plans, to be included in ..."

- Policy 5.1.1.5: "That Secondary Plans shall be prepared by the City and/or participating property owners in consultation with the public, pursuant to the policies of Section 5.1.2 of this Plan."

- Secondary Plans vs. Block Plans Explanatory Note on page 323: "Secondary Plans are City-led and/or privately led planning exercises which form …"

Comment #5: Housing Affordability

We support the intent behind the affordable housing target; however, we respectfully submit the following comments:

A. Implementation Framework & Administrative Clarity

We would like to understand how the City intends to administer and implement the affordable housing targets presented in Policy 3.2.1.1 of the draft VOP 2025. It would be helpful to understand how the 25% target will be monitored and enforced. A clearly defined implementation strategy would ensure transparency and consistency.

B. Municipal Tools

While Primont supports the delivery of affordable housing, it is important to acknowledge that achieving meaningful affordability outcomes often depends on tools and incentives. These include:

- Reductions in development charges and municipal fees;
- Reductions or exemptions in government taxes and fees;

- Assigning Community Benefit Charges to affordable housing; and,
- Expecting and streamlining approval timelines.

Without these supports - which are tools beyond the control of the draft VOP 2025 – it will be challenging to achieve a 25% affordable housing target. We encourage the City to continue to further investigate these tools.

C. <u>Policy Language</u>

We propose the following amendment in red to draft Policy 3.2.1.1(a) to clarify that the affordable housing target should not be interpreted or enforced on a per-application basis, especially for small-scale infill developments that may not be able to accommodate such requirements due to site-specific constraints:

> *"… that a minimum of 25% of all new housing units in Vaughan outside of the VMC and PMTSAs be affordable. This policy shall not be based on a specific infill development where in the opinion of staff it could be too small to accommodate, but will be applied based on the scale of the development."*

While we are generally supportive of policy to provide diverse housing options in Vaughan, the target identified should not be applicable to individual development or phases of development.

We request this policy be amended or recommend that the City reconsider the use of the phrase "a minimum of 25%." The policy should be written to "encourage up to 25% of all new housing units outside of the VMC and PMTSA's be affordable." This adjustment would allow for a more balanced and realistic implementation pathway, while still advancing the City's affordability objectives.

CONCLUSION

In summary, it is our respectful position that the Draft VOP 2025 be amended to reflect the following comments:

1. Revise Subject Site 1's designation on Schedule 1 to reflect a base of "Community Area" and "Natural Areas and Countryside" with the "Approved Regional Employment Conversion" overlay;

2. Delete draft Policy 2.3.1.5 as it is broad, can have the effect of delaying development in New Community Areas, and is inconsistent with the PPS 2024;

3. Provide clarification on how the YROP, 2022 will be integrated into the Draft VOP 2025;

4. Allow and encourage privately led Secondary Plans; and,

5. Provide clarification on the administration of affordable housing targets, consider additional tools outside of the Draft VOP 2025 process to encourage affordability, and consider amending the policy language based on our proposal.

We request that Primont's position outlined above be reviewed and considered. We would also like to reserve the right to provide further comments on the policies and/or schedules of the Draft VOP 2025, as it relates to the future development of the subject properties. We respectfully request to be notified of any future reports, public meetings, and decisions in relation to this matter.

Thank you for your detailed review and consideration of this request. If you have any questions regarding the above comments, please contact the undersigned at (416) 797- 8967 or at ian@primont.com.

Yours sincerely,

Ian MacPherson

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