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
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Attention: Honourable Rob Flack, Minister of Municipal Affairs and Housing (MMAH)
c/o Matthew Meighoo, MMAH – Central Ontario

Re: Letter Submission on Behalf of Bostar Inc. and 1639326 Ontario Ltd. 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)
SE Corner of Hwy. 7 & 27 – 5875 Highway 7 & PART BLOCK 1 PLAN 65M3033
PART BLOCK 1 PLAN 65M3033, PARTS 1, 2, 3, 4 & 5 PLAN 65R35836; and PART BLOCK 2 PLAN 65M3033 PARTS 73, 74, 75, 76 PLAN 65R26788.
City of Vaughan

A. INTRODUCTION

Innovative Planning Solutions Inc. ('IPS') is the planning consultant for Bostar Inc. and 1639326 Ontario Ltd., owners of lands located at the southeast corner of Highway 7 and Highway 27 in the City of Vaughan (herein referred to as the 'Subject Lands'). Refer to Figures 1 and 2 for the location of the Subject Lands.

On April 15, 2025, Official Plan Amendment and Zoning By-law Amendment Applications (OP.25.007 & Z.025.17) were submitted to the City of Vaughan proposing high-rise, mixed-use development on the Subject Lands. These planning applications were deemed complete under the *Planning Act* (on **January 20, 2026**), and are supported by comprehensive technical studies, including architectural design, engineering reports, traffic assessments, and land use compatibility analyses. The planning applications were not deemed complete prior to the adoption of VOP 2025 and were deemed complete prior to the full adoption of VOP 2025. The statutory public meeting under the *Planning Act* for the above-noted planning applications is anticipated on March 31, 2026.



FIGURE 1 – SUBJECT LANDS



FIGURE 2 – SUBJECT LANDS & SURROUNDING AREA

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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 and has made both written and oral submissions to the City of Vaughan as part of their Official Plan Review (OPR) process. The Council-endorsed VOP 2025 understood to be consistent with and conform to PPS 2024. Enclosed with this letter are submissions made by the landowner to the City of Vaughan.

VOP 2025, as endorsed by Vaughan Council on October 22, 2025 provides the Subject Lands with the following:

1. *Strategic Growth Areas* & *Community Areas* per Schedule 1 – Urban Structure (Refer to Figure 1);
2. *Primary Corridor* per Schedule 1B – Strategic Growth Area;
3. Schedule 10 – Major Transit Network designates Highway 7 as a *Regional Rapid Transit Corridor*[1]*; and,*
4. *Non-Residential Mixed-Use* per Schedule 13 – Land Use Designations subject to 8-10 storey height limitations (Refer to Appendix 2).

On behalf of our clients, we are supportive of proposed land use policies and designations in the VOP 2025 as they relate to items 1, 2 and 3 above; however, with respect to Item 4, **we request that Schedule 13 – Land Use Designations be modified to provide the Subject Lands with the *High-Rise Mixed-Use*.**

In our view, Schedule 13 in VOP 2025 inappropriately restricts the Subject Lands to a mid-rise non-residential in as area providing for growth and intensification within a higher-order transit corridor. The restrictive assignment of the *Non-Residential Mixed-Use* designation set out in Schedule 13 does not align with the City's broader objectives for complete communities and higher-density development in *Strategic Growth Areas* & *Community Areas*.

B. PLANNING RATIONALE

This section of the letter provides an overview of our planning rationale contextualizing and justifying the request.

B.1 The Subject Lands and VOP 2025's 2051 Vision

The City of Vaughan's 2051 Vision embedded in VOP 2025 as the City's guiding land use planning policy document delivers direction from Council on meeting the needs and values of its municipality leading into the planning horizon of 2051.

[1] Schedule 10 notes that *Regional Transit corridors are maintained by York Region and York Region Transit Corporation*.

Section 2.1.2 *Vaughan's Evolution: Key Planning Objectives* provides for the primary objectives of VOP 2025, including but not limited to:

- Growth management and intensification within the Built-Up Area and identified intensification areas;
- Strategic Growth Areas as the primary locations for accommodating intensification and redevelopment;
- Compact, higher-density, and transit-supportive urban form;
- Creation of Complete Communities that support transit use and Active Transportation;
- Transit-supportive densities and mixed-use development along major transit corridors;
- Promotion of walking, cycling, and Active Transportation through compact, walkable community design and supporting infrastructure;
- Provision of a diverse range of housing options across tenure, affordability, size, and built form;
- Coordinated and phased development aligned with the delivery of municipal and regional infrastructure;
- Inclusive and accessible community planning and urban design; and,
- Comprehensive financial management that integrates economic, environmental, and social considerations.

The planned and proposed urbanization on the Subject Lands exhibit a high-degree of alignment with these objectives, by virtue of their strategic location, scale, and interface with existing and planed infrastructure, and their capacity to accommodate compact, transit-supportive mixed-use development that contributes to intensification, complete and sustainable community, and coordinated growth management outcomes.

B.2 Strategic Growth Areas & Community Area:

The Highway 7 *Strategic Growth Areas* & *Community Area* corridor offers the opportunity to support high-density, transit-supportive development and complete and sustainable communities with a mix of land uses and the opportunity to building upon the significant public and private infrastructure investment made by all levels of government along Highway 7 and surrounding areas, i.e., the Highway 407 & 427 corridors.

Policy 2.2.1.2 provides that *Strategic Growth Areas* will be the primary location for growth and the greatest mix of uses, heights and densities established in policy 2.2.1.1.

Policy 2.2.1.1 of VOP 2025 provides *Primary Corridors are a major focus for Intensification on the lands adjacent to major transit routes, at densities in a form supportive of the adjacent Higher Order Transit*.

Policies in *2.4 Strategic Growth Areas (Schedule 1B)* reinforce the intensification hierarchy provided in Policy 2.2.1.1 and 2.2.1.2, by providing that the Subject Lands and other lands in *Strategic Growth Areas* provide:

- *the highest rate of new residential growth and accommodate most of the forecasted residential growth to support the 57% **Intensification** target* (2.4.1.1.a);
- *support **Major Office**, Major Institutional, and **Retail Commercial*** (2.4.1.1.b); and,
- *facilitate the **Development** of a mix of uses and appropriate densities to support high levels of existing or planned transit and **Active Transportation*** (2.4.1.1.c).

The bifurcation of residential and non-residential land uses and the assignment of prescribed mid-rise heights and medium-density permissions in Schedule 13 along the Highway 7 Strategic Growth Area, *Primary Corridor* and *Community Area* reflect the land use vision and policy framework of VOP 2010 and are no longer responsive to the current planning, market, and infrastructure context affecting the Subject Lands.

From a policy implementation perspective, the continued separation of residential and non-residential land uses at this scale reflects an implementation-level approach that is not suitable for the Subject Lands and is inconsistent with the need for long-term flexibility within strategic growth corridors.

In this context, the mid-rise / medium-density *Non-Residential Mixed-Use* designation in Schedule 13 is overly limiting and does not provide the flexibility or long-term outlook necessary to realize the planned role of the Highway 7 corridor as a *strategic growth area*. The prescriptive nature of this designation constrains the ability of the Subject Lands to evolve as part of a transit-supportive and mixed-use development corridor consistent with land use compatibility policies in PPS 2024.

B.3 Primary Corridors, Transit-Oriented Development & Local and Regional Transit:

It is acknowledged that Policy 2.4.5.3(f) of VOP 2025 provides that *Primary Corridors* and *Local Corridors outside of Employment Areas shall be planned to: be designed and developed to implement appropriate transition of **Intensification** and use to surround **Community Areas**, and/or separation from adjacent **Employment Areas***.

This policy establishes a framework for evaluating the suitability of transitional land uses between *Employment Areas, Community Areas,* and *Primary Corridors*. It enables development to be permitted where appropriate transition in both built form and land use can be demonstrated through detailed planning and design analysis.

While Policy 2.4.5.3(f) requires that appropriate transitions be considered and achieved, it does not prescribe or pre-determine the specific mix of uses, whether residential, office, or other employment-supportive uses. Rather, it calls for a contextual assessment to determine whether a proposed use can function compatibly within the corridor, without introducing a policy bias against residential uses and without constraining future planning outcomes through premature 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.

When read together with Policy 2.4.5.3(f) of VOP 2025, PPS 2024's Policy 2.8.1.3 reinforces that transitional areas along *Primary Corridors* are intended to be planned through a contextual, evidence-based approach. The appropriate mix of uses, density, and built form should be resolved through subsequent implementing planning instruments, most notably a Zoning By-law Amendment or detailed design applications, that give effect to the City's long-term vision for strategic corridors. Such an approach enables detailed evaluation of land use compatibility, built form transition, transportation and servicing capacity, and mitigation measures, while maintaining consistency to and conformity with provincial policy, and avoiding premature constraints on future development outcomes.

B.4 Land Use Designations – Schedule 13:

Schedule 13 in VOP 2025 carries over the legacy land use and development framework established under VOP 2010 for the Subject Lands. When VOP 2025 and the PPS 2024 are interpreted conjunctively, the application of this legacy designation is internally inconsistent with both the range of permitted uses and the higher-order development context planned for *Strategic Growth Areas*.

This internal inconsistency does not amount to a prohibition on permitted uses. Rather, it reflects an implementation framework that constrains development outcomes at the Official Plan level that are otherwise contemplated by the broader policy direction of VOP 2025 and the PPS 2024. While Schedule 13 is intended to provide guidance respecting development patterns, the continued reliance on a VOP 2010-era framework has the effect of narrowing the scope of policy application within *Strategic Growth Areas* and *Primary Corridors*. **Furthermore, it does not have the regard for Section 1(1) of the *Planning Act* and is not consistent with and conform to PPS 2024**.

There is no policy basis in VOP 2025 or the PPS 2024 for categorically excluding non-employment land uses, such as office or residential uses, within *Strategic Growth Areas* or along *Primary Corridors* where appropriate technical standards can be met. The Plan does not preclude such uses; rather, it anticipates that their appropriateness will be evaluated through a site-specific planning process.

In this regard, PPS 2024 Policy 2.8.1.3 provides that … development on lands within 300 metres of Employment Areas may proceed provided that potential impacts on the long-term economic viability of existing or planned employment uses are avoided, or where avoidance is not possible, minimized and mitigated, in accordance with provincial guidelines. This policy expressly contemplates site-specific assessment and does not introduce a bias against any particular use category.

In the balance of considerations, the determination of appropriate land use, density, and built form within *Strategic Growth Areas* 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.

B.5 Transition Policies

We have reviewed the City of Vaughan's transition policies under 1.3.2 of VOP 2025, more specifically, *Applications and Appeals in Progress*. As indicated above, the planning applications

received Notice of Complete Application (under the *Planning Act*) prior to the forthcoming approval of VOP 2025 **and were incomplete prior to the adoption of VOP 2025 by Council**.

Notwithstanding Policy 1.3.2.1.b, we request that upon approval of VOP 2025, that VOP 2025 be the sole Official Plan applicable to the Subject Lands and its planning applications.

Based on the Subject Lands' current planning application status Policy 1.3.2.4.a. of VOP 2025 applies. It is our opinion that the current planning applications **shall be reviewed and assessed under VOP 2025 in accordance with this policy, and that as they afford a Notice of Complete Application under the *Planning Act*, that both VOP 2010 and YROP 2022 policies and schedules shall not apply.**

REQUEST AND CONCLUSION

VOP 2025 marks a significant step in aligning local policy with PPS 2024.

The Subject Lands, located within a *Strategic Growth Area* and *Primary Corridor*, are ideally positioned to support the City's intensification and sustainability objectives.

While Schedules 1 and 1B reflect this context, we request that Schedule 13 should be updated to support a broader mixed-use vision, including residential uses, consistent with the existing and planned context of the Highway 7 Strategic Growth Area / Primary Corridor, the Community Areas, and PPS 2024. We request that Schedule 13 be modified to reflect the *High-Rise Mixed-Use* designation on the Subject Lands.

We also request the opportunity for planned and anticipated land use planning framework carry forward under VOP 2025, once approved by the MMAH.

Should you have any questions or require further information, please reach out to the undersigned.

Respectfully submitted,
Innovative Planning Solutions



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c. Clients

APPENDIX 1: SCHEDULE 1 – URBAN STRUCTURE



APPENDIX 2: SCHEDULE 13 – LAND USE

