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Communication
CW: Apr 14 / 15
Item: 1

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**DELIVERED VIA EMAIL**

April 13, 2015

The Corporation of the City of Vaughan  
2141 Major Mackenzie Drive  
Vaughan, ON L6A 1T1

Attention: Mayor and Members of Council

Dear Mayor and Members of Council:

**RE: April 14, 2015 Committee of The Whole - Item 1 – Natural Heritage Network – Amendments to Official Plan 2010 – Request for Further Community Consultation**

I regret that I will not be able to speak to this issue in person on April 14, 2015, but would ask Council to consider the following written submission before making its decision in respect of the above-noted item.

I am deeply concerned that Vaughan residents have not been provided a chance to understand the implications of, and provide meaningful input into, Staff's recommended changes to the Vaughan Official Plan. Council should consider whether it is appropriate to direct Staff to provide a further opportunity to do so, given the scope and impact of these proposed changes.

While there is no question that Staff has conducted deliberate consultation throughout the process, in my respectful opinion Council would benefit from further consultation on Staff's recommended course of action to change the Vaughan Official Plan, before Council makes its decision on this matter.

*Format Information to be more Accessible to Residents*

As a procedural point, I would urge Council to look at the format of information that comes before Council, and would suggest that adding a "summary" document would improve a reader's ability to quickly understand the implications of the proposed change, and enhance meaningful participation in this democratic process.

From a legal perspective there of course needs to be precision in amendments being proposed (in this case to the Official Plan), and the existing amendment proposal document is necessary and in the right format.

However, I am suggesting an additional "Summary" document that allows readers to understand the recommended changes quickly and easily, because frankly the current format does not lend itself to easy understanding. As you know, a reader currently needs to consider the amendment document, then review and consider the Vaughan Official Plan, as amended, to mentally determine the impact of the proposed change. This is not an easy task and probably makes this information inaccessible to a

group of Vaughan residents who would otherwise be interested in the information and providing feedback to Council.

To make it easier, I am strongly suggesting that Council consider directing Staff, perhaps as a pilot project on this matter, to produce a reader-friendly companion document that would summarize the proposed changes in an accessible and easy-to-understand way.

In my view better disclosure enhances democratic participation (again, more people would understand the implications of the change, and would be able to voice an opinion on the change) which better informs Council's decisions.

A few examples might be helpful:

Rather than simply stating, on p. 144 of a 151 page report document:

"Deleting in 3.2.3.2 the word "additions" and replacing it with "modifications"

A brief, plain language disclosure / summary document might read:

"The Official Plan allows for enhancements to our natural heritage elements. Staff is proposing that we amend the Official Plan by deleting the word "additions" in Section 3.2.3.2 and replacing it with "modification", which means that areas identified as natural heritage features can be reduced or deleted entirely.

Staff's rationale for this change is: [XXXXX] *[Note: In this section Staff could describe comments from stakeholders, and how the change is in the best interest of the City, so residents can easily understand the intent and implication of the change.]*

For further information, please refer to Section X of the Recommendation, which is on page Y."

This approach centralizes information in one place, would enhance Staff accountability by making it clear what change is being proposed and why, and would allow readers to understand the change and the rationale for the change.

A second example of a narrative/summary would be:

"The Official Plan currently protects significant natural woodlots in the City. Staff is proposing that we amend the Official Plan to allow certain natural woodlots to be destroyed as part of a development, so long as the developer provides compensation for doing so and the developer's plan is approved by the City of Vaughan, the Region of York and the Toronto and Region Conservation Authority.

Staff's rationale for this change is: [xxxx]"

I set out below a few procedural comments I would anticipate being debated at the meeting:

#### *Recommendation Prevails over Summary*

To ensure there is no legal issue with adding a summary statement / disclosure document, a standard statement could be added to each disclosure document that makes it very clear of the summary nature of the document, directing readers to the actual Staff recommendation, and

indicating that to the extent the summary document conflicts with the body of Staff recommendation, the recommendation document prevails, so there is no ambiguity or risk of ambiguity leading to future dispute.

#### *Cost*

From an effort and cost perspective, given that all this information is already collected and analyzed through the consultation process, there would seem to be very little incremental additional cost in adding a summary / disclosure document.

#### *Use of Examples*

As a non-expert in this area, it is hard for me (and presumably for others) to understand the implications of these proposed changes on our community. Examples always help so if there are opportunities for examples to be added in the disclosure document that would be useful.

#### *Timing*

It strikes me that this type of broad-reaching policy decision is important enough that a few more months of consultation would not adversely impact the City.

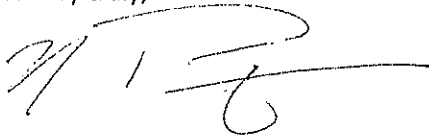
#### **Position on Staff Recommendations**

It seems to me that certain of the recommendations of Staff will dilute the protections to our natural heritage network that Council previously concluded were reasonable and appropriate.

I think further consultation by Staff with residents, on a ward by ward basis, which consultation would include Staff bringing forward actual examples of how these recommended changes would impact residents of each ward, would be very helpful and would allow residents to provide informed and meaningful input into to process.

All Council decisions benefit from stakeholder engagement, and I hope Council decides this issue is significant enough to allow meaningful consultation in order to make a well-informed decision.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Nick G Pasquino', with a stylized flourish at the end.

Nick G Pasquino BA LLB