

# DEPUTATION REQUEST

COMMITTEE OF THE WHOLE

MARCH 12, 2020

**Subject:** Request for Employment Conversions

**Spokesperson:** Jonathan Sasso, Humphries Planning

**Name of Group or person(s) being represented (if applicable):**

Vaughan 400 North Landowners Group Inc.

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**Brief summary of issue or purpose of deputation:**

We would like to provide comments with respect to Staff's assessment of the request for employment conversion for the Vaughan 400 North Employment Area.

(Attachment)

OFFICE OF THE REGIONAL CLERK

1-877-464-9675 x. 71320

york.ca





March 10, 2020

HPGI File: 0449

**Clerk's Office**

**Region of York, Corporate Services Department**

York Region Administration Building

17250 Yonge Street

Newmarket, ON

L3Y 6Z1

**Attention: Mr. Christopher Raynor, Regional Clerk**

**Re: Five-Year Municipal Comprehensive Review and Regional Official Plan Update  
MCR Staff Report - H.1.1 – Requests for Employment Conversions  
Committee of the Whole Meeting – March 12, 2020  
Vaughan 400 North Landowners Group Inc.  
Blocks 34W and 35, City of Vaughan  
Lots 26 through 35, Vaughan Conc. 5 & Lot 1, King Conc. 5**

Humphries Planning Group represents owners within the Vaughan 400 North Landowners Group Inc. area, being Blocks 34W and 35 in the City of Vaughan ("Vaughan"). What follows is further to our letter dated July 25, 2018, attached for convenience of reference, and the March 12, 2020 Staff Report to the Regional Committee of the Whole regarding Employment Land Conversion Requests.

**Site Specific Conversion Request**

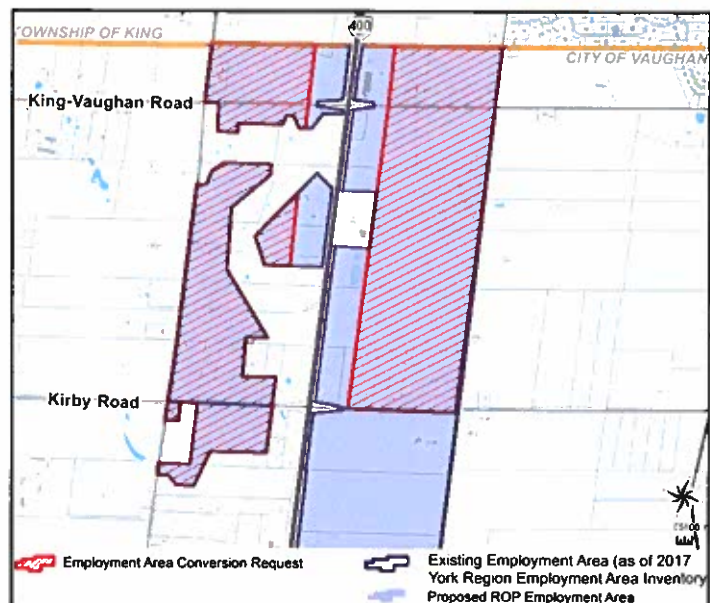
The Vaughan 400 North Landowners Group Inc. area conversion is Request No. V7 in the March 12, 2020 Staff Report.

Staff's Summary of Assessment is:

*"The site is part of the Vaughan's 400 North Employment Area (also known as ROPA 52) which has not had sufficient time to develop as an employment area. Lands are within areas not considered for conversion."*

Staff's recommendation is:

*"Not recommended for conversion to non-employment uses. Designate as employment in the Regional Official Plan."*



**Our Comments**

First, the March 12, 2020 Staff Report maps our client's Employment Area Conversion Request beyond the mid-block location that was illustrated on our client's July 25, 2018 letter. This inaccurate depiction of the Request is troubling, as it is unclear if Staff properly understood it, with the consequence that the Staff Report's mapping has the potential to mislead the Committee and Council.

For the reasons already expressed in our client's July 25, 2018 Request, we remain of the opinion that the Conversion Request is appropriate, and should be granted. In addition, HPGI disagrees with the specific Recommendation in the March 12<sup>th</sup> Staff Report.

In particular, and for two reasons, **any Staff recommendation on the Request is premature** at this time. First, the updated 2041 *Growth Plan* forecast numbers and new Provincial Land Needs Methodology have not been released by the Province. Secondly, Vaughan Council has not indicated its position on employment area planning, including site-specific conversion requests like our client's.

**Neither a Staff nor a Council position on Request No. V7 should be taken until these things happen.**

We will provide further comments at that time. Thank you for considering our input.

Yours sincerely,  
**HUMPHRIES PLANNING GROUP INC.**



Rosemarie Humphries, BA, MCIP, RPP  
President

cc: Mr. Bill Kiru, Acting Deputy City Manager, City of Vaughan  
Mr. Paul Freeman, Chief Planner, Region of York  
Mr. Paul Bottomley, Manager of Policy, Research and Forecasting  
Vaughan 400 North Landowners Group Inc.  
Mr. Michael Melling, Davies Howe LLP  
His Worship Mayor Bevilacqua and Members of Vaughan Council

July 25, 2018  
HPGI File: 0449

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**Region of York, Corporate Services Department**  
York Region Administration Building  
17250 Yonge Street  
Newmarket, ON  
L3Y 6Z1

**Attention: Mr. Christopher Raynor, Regional Clerk**

**Re: Five-Year Municipal Comprehensive Review and Regional Official Plan update  
Vaughan 400 North Landowners Group Inc.  
Blocks 34W and 35, City of Vaughan  
Lots 26 through 35, Vaughan Conc. 5 & Lot 1, King Conc. 5**

Humphries Planning Group represents owners within the Vaughan 400 North Landowners Group Inc. area, being Blocks 34W and 35 in the City of Vaughan ("Vaughan"). We provide herein comments to the Region in relation to the Five-Year Municipal Comprehensive Review and Regional Official Plan update that the Region has initiated.

## Background

The Vaughan 400 North Landowners Group Inc. area was brought into the Urban Area and designated for Employment Land Uses by ROPA 52 through an Ontario Municipal Board Decision dated August 19, 2010. The majority of the area was then designated for Employment Uses by Vaughan OPA 637 through an Ontario Municipal Board Decision dated November 21, 2011.

Our client is requesting that the Region consider a land use conversion to Residential for this area as part of its Municipal Comprehensive Review and update to the Regional Official Plan.



Figure 1- Extract of Vaughan Block Map

### Surrounding Development Pattern

Immediately to the south of the Vaughan 400 North Landowners Group Inc. area is Block 33.

Block 33 East has largely developed with Residential uses, with the exception of some commercial and retail uses, an Esso gas station and the Mackenzie Health Centre, which is currently under construction, along Major Mackenzie Drive.

Block 33 West has developed with Prestige Employment along the highway and Residential uses to the west, separated by City view Blvd. The Prestige Employment area is highlighted in blue on **Figure 2**, and the Residential area is highlighted in yellow.



Figure 2 - Block 33, City of Vaughan

Block 42 is west of Block 35W and could potentially provide for further Residential uses surrounding the Vaughan 400 North Landowners Group Inc. area.

Block 41, to the west of Block 34W, is also Residential. This is a similar situation to Block 40, to the west of Block 33W, and in our professional opinion developing Block 34W and 35W in a manner similar to how Block 33W was developed, as a continuous development pattern, would be the ideal land use approach.

The future adjacent communities of Blocks 41 and 42 would provide for a continuous Residential area, should the Vaughan 400 North Landowners Group Inc. area be designated for Residential uses. At the same time, this land use option would still provide for Prestige Employment uses in close proximity to the 400-series highway. The concept is illustrated in **Figure 3**.

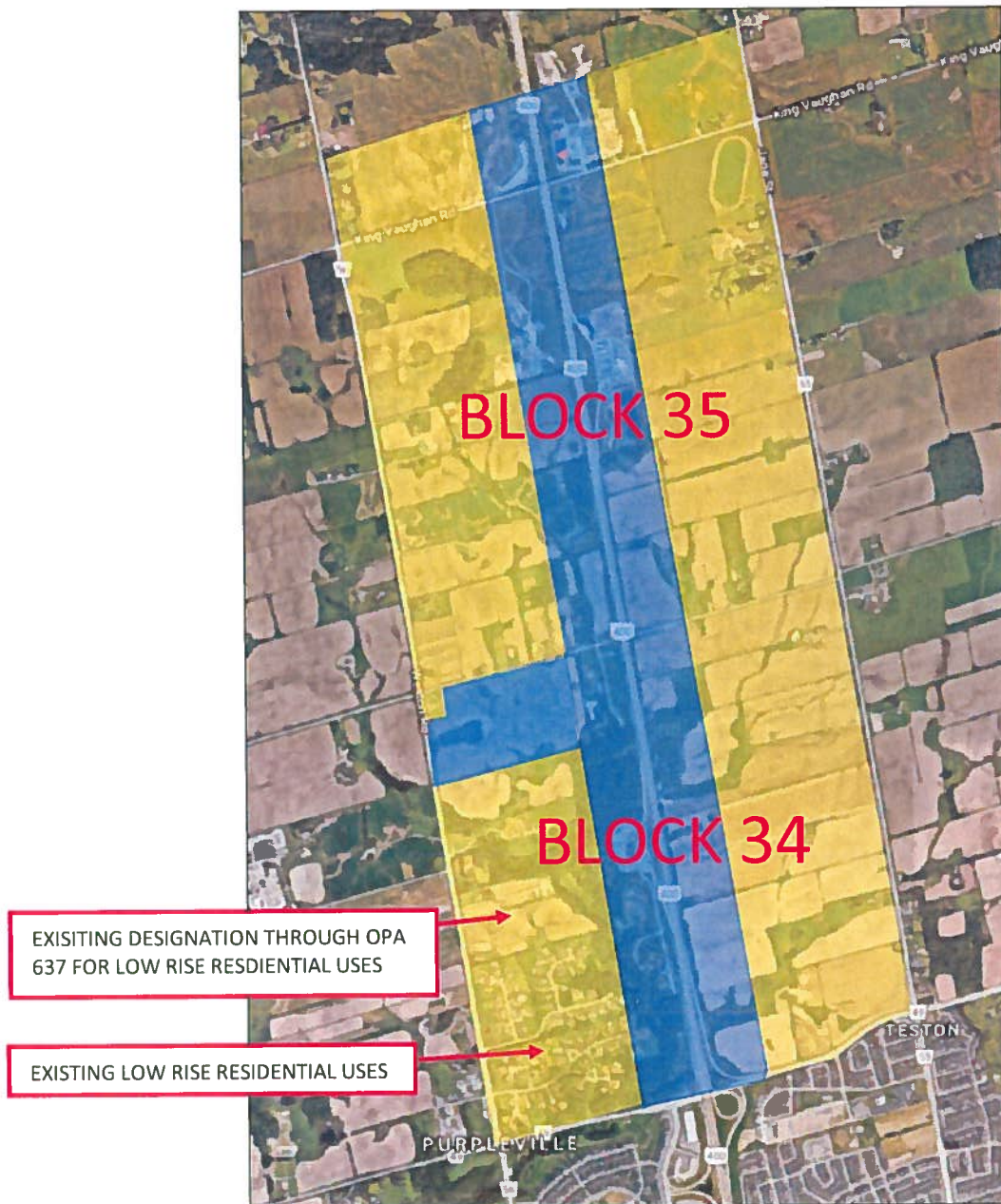


Figure 3 - Land Use Concept for Blocks 34 and 35

In this land use concept, the proposed Prestige Employment area is highlighted in blue, and the proposed Residential area is highlighted in yellow. The existing service station in Block 34W and the existing Employment uses in Block 35 would fall within the proposed Prestige Employment area. Providing a similar development pattern on Block 34E and 35E is also the ideal option in order to locate the Prestige Employment Uses in closest proximity to the 400-series highway, while ensuring a continuous Residential area with the future Residential communities to the east. There is also a pattern of Rural Residential development to the north of Block 35 along Weston Road and Jane Street and Residential development within the hamlet of Laskay, in the Township of King.

**Review of Provincial Criteria for Conversion**

In our view, the proposed land use change properly recognizes existing retail and Residential uses, is appropriate, and satisfies the tests set out in Section 2.2.5.9 of the *Growth Plan for the Greater Golden Horseshoe, 2017*:

**The conversion of lands within *employment areas* or *prime employment areas* to non-employment uses may be permitted only through a *municipal comprehensive review* where it is demonstrated that:**

**a) there is a need for the conversion;**

There is a need for the change from a site-specific planning perspective to recognize the existing uses in the area and surrounding areas. There are lands fronting onto Highway 400 which are occupied with existing retail uses (Highway 400 Service Centres). The surrounding area is a pattern of Residential development to the south and to the north, in the Township of King, which form an existing corridor of Residential uses.

**b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;**

Most of the existing development is already in retail use, specifically the Highway 400 Service Centres. As such, some of the frontage lands have already been effectively removed from Employment land use.

The updated *Places to Grow Schedule 3* shows revised population forecasts to 2031 with 90,000 additional persons, whereas there are only 10,000 more jobs (Figure 4). The Region will need to provide significantly more land for housing compared to Employment in the 20-year planning horizon in order to accommodate the revised Provincial forecasts.

Distribution of Population and Employment for the Greater Golden Horseshoe to 2041 (figures in 000s)						
	POPULATION			EMPLOYMENT		
	2031	2036	2041	2031	2036	2041
Region of Durham	970	1,080	1,190	360	390	430
Region of York	1,590	1,700	1,790	790	840	900

*Note. Numbers rounded off to nearest 10,000 for GTAH municipalities, GTAH Total and Outer Ring Total, and to nearest 1,000 for outer ring municipalities.  
 \* Total may not add up due to rounding*

**Figure 4** - Excerpt from the Updated Schedule 3, Places to Grow, May 2017



East Gwillimbury, Markham and Vaughan are the three municipalities with a considerable potential supply of land for Employment development through expansion into the 'Whitebelt' Area to accommodate Employment growth to 2041 in areas contiguous to existing, designated Employment areas (Figure 5). In Vaughan the relevant area is south of Nashville Road, along the west side of Huntington Road.

**Table 12**  
**2041 Urban Expansion Requirements for Employment Lands by**  
**Local Municipality, 2041<sup>1</sup>**

	Urban Expansion Employment Land Employment Jobs <sup>1</sup>	Density (jobs per hectare)	'Whitebelt' Land Area Requirement (ha) <sup>2</sup>
East Gwillimbury	1,700	40	43
King	1,520	40	38
Vaughan	3,160	40	79
York Region	6,380	40	160

1. Figures may not sum due to rounding  
 2. From Table 11  
 3. 'Whitebelt' Area Jobs divided by Density

Figure 5 - Table 12 of York Region's 2041 Preferred Growth Scenario Land Budget

The Region's 2041 Preferred Growth Scenario Land Budget determined that no new Employment lands are required to 2036, and that 160 developable hectares of Employment lands are required to 2041 (Figures 5 and 6).

The former draft OP Review materials determined that from 2036 to 2041, the lands in Block 42 are proposed for urban expansion, as they are a logical extension to the ROPA 2 community lands. Block 42 is west of Block 35W, and provides for further Residential uses surrounding the Vaughan 400 North Landowners Group Inc. area. Block 41, to the west of 34W, is also Residential, and these future adjacent Residential communities would provide for a continuous Residential area, should the Vaughan 400 North Landowners Group Inc. area be designated for Residential uses.

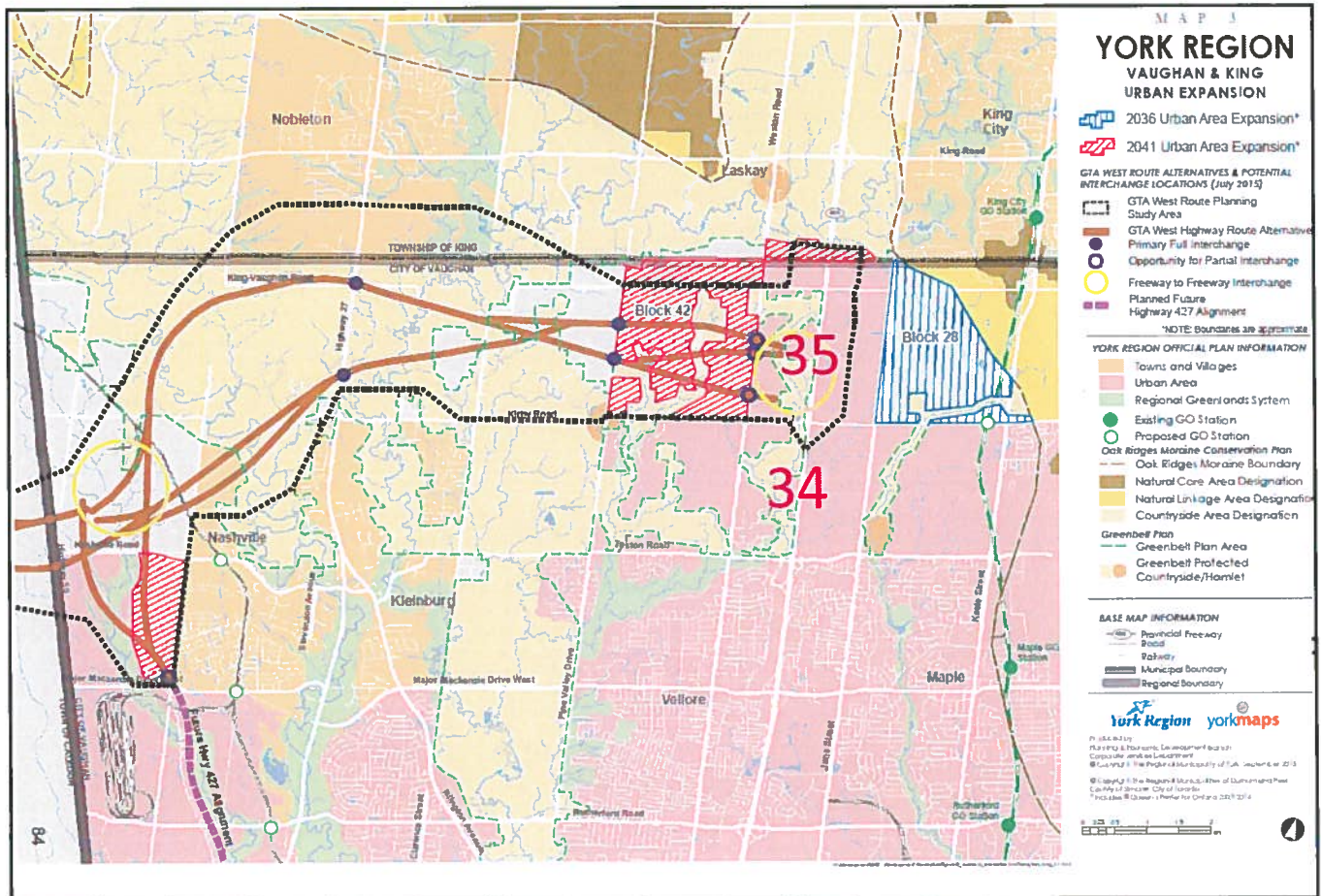


Figure 6 - Map 3 of York Region's 2041 Preferred Growth Scenario Land Budget

A small amount of vacant Employment land is forecasted to be developed for Major Office type Employment uses. The Region's land budget assumes that all of the Major Office growth in Aurora and King, 35% of the Major Office growth in Richmond Hill, and 50% of the Major Office growth in Markham and Vaughan will be on Employment lands.

This Major Office land requirement (being 163 net ha.) has been removed from the vacant Employment land supply as it is not anticipated that these lands will accommodate Employment Land Employment growth. It is our opinion this is a flaw in the land budget analysis because it undercuts the supply of Employment lands in Vaughan by not including the supply for Major Office, which on Employment lands will be 50% for major office growth. It also over-estimates the demand for Employment land.

The Region's work concludes there is adequate land supply for Employment uses to 2036, with the now-approved urban area boundary expansions in East Gwillimbury, Markham and Vaughan; however, the Region's land budget excludes the approximately 340 net hectare Highway 400 North lands from the supply calculation, as well as 163 net hectares of Major Office land. For these reasons, it is our opinion the Vaughan 400 North Landowners Group Inc. area is

not required for Employment land over the planning horizon, and should be considered for land use conversion to permit Residential uses.

- c) **the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;**

A change to Residential land uses in this location will not impair the City's ability to achieve its economic objectives, as described above in our response to test b). According to York Region's *Vacant Land Inventory Report*, dated March 2, 2018, Vaughan has the largest supply and highest vacancy rate. There are 240 vacant Employment parcels totalling 1,042 net hectares, which is nearly 40% of York Region's overall vacant Employment land supply (Figure 7). This represents a supply well beyond the planning horizon for Vaughan, and conversion of the Vaughan 400 North Landowners Group Inc. area should be considered.

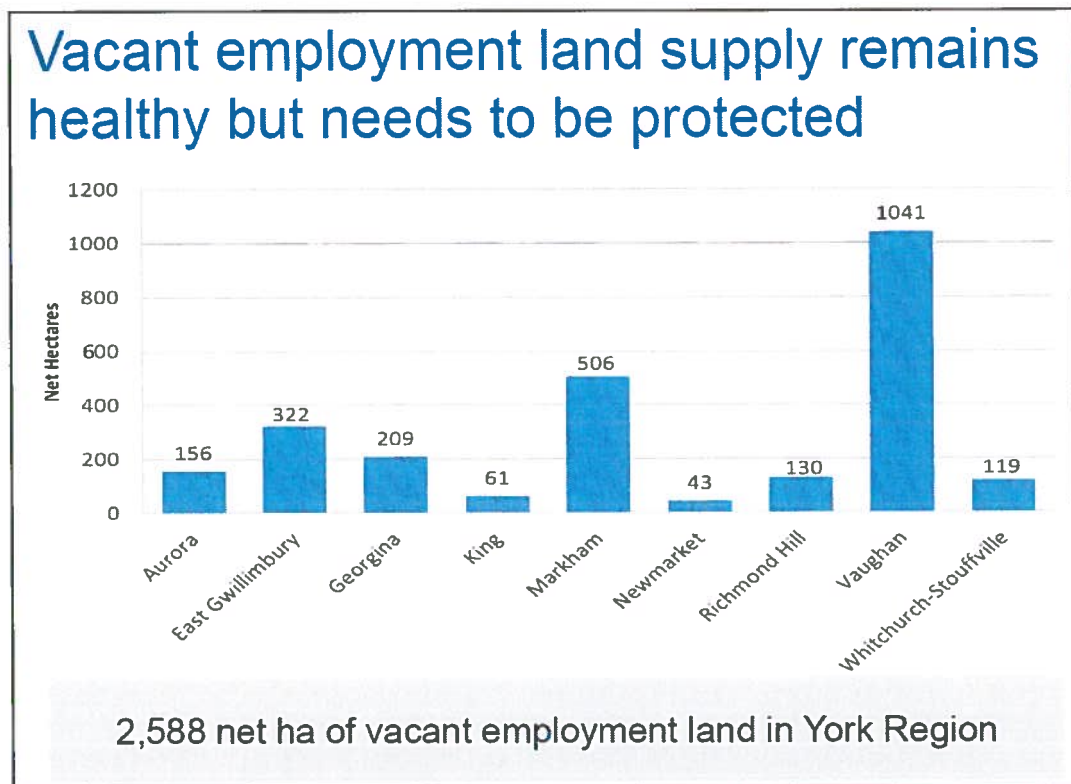


Figure 7 - Vacant Employment Land Supply Chart - York Region Vacant Land Inventory Report, March 2, 2018

- d) the proposed uses would not adversely affect the overall viability of the *employment area or prime employment area* or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and**

The proposed Residential designation reflects the existing pattern of development to the north and south. Some of the frontage lands are already in primarily retail use. A change in designation to Residential uses will not adversely affect the frontage lands, and will primarily serve to solidify the existing pattern of Residential uses to the north and south. By contrast, buffering of the planned Employment uses to existing Residential to the north and south, would adversely affect the viability of the Employment area. As a result, Residential uses would more viable in creating efficient land utilization and land use patterns.

- e) there are existing or planned *infrastructure and public service facilities* to accommodate the proposed uses.**

There is existing and planned infrastructure to accommodate either Residential, retail or Employment uses. The City and Region's vision for the area is that the future urban land be serviced by full municipal servicing. The expectation is that development will pay for the required infrastructure to extend municipal servicing. The timing for this with Employment uses is uncertain, and will likely be long-term; if the Region initiates conversion to Residential uses the timing for development and servicing will be more immediate.

We ask that this input into the Municipal Comprehensive Review of the Regional Official Plan be considered by Regional Staff.

Yours sincerely,  
**HUMPHRIES PLANNING GROUP INC.**



Rosemarie Humphries, BA, MCIP, RPP  
President

cc: Mr. Jason Schmidt-Shoukri, Deputy City Manager, City of Vaughan  
Mr. Paul Bottomley, Manager of Policy, Research and Forecasting  
Vaughan 400 North Landowners Group Inc.  
Mr. Michael Melling, Davies Howe LLP