

March 11, 2020
HPGI File: 19634

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
MRC Staff Report- H.1.1 – Requests for Employment Conversions
Committee of the Whole Meeting – March 12, 2020
7300 and 7370 Martin Grove Road (City of Vaughan)
Martingrove North Properties Inc. & Martingrove South Properties Inc.**

Humphries Planning Group represents Martingrove North Properties Inc. and Martingrove South Properties Inc., the legally registered owners of the properties located at 7300 and 7370 Martin Grove Road within the City of Vaughan (the 'Subject Lands'). Further to our comment letter dated January 9, 2020 and based on our review of the March 12, 2020 Staff Recommendation Report regarding Site Specific Employment Area Conversion Requests to the Regional Committee of the Whole, we have a number of comments and concerns, as outlined below:

Site Specific Conversion Request

We note that the conversion request for the Subject Lands is not identified in the March 12, 2020 Staff Report. As such, it appears that Staff has not yet undertaken a review of our conversion request nor have they provided a detailed analysis and evaluation using the York Region Employment Area Conversion Criteria. Further, the Report does not provide a recommendation for approval or refusal of the subject employment conversion.

At this time, it is recognized that without this information, the employment conversion exercise and assessment process is considered to be incomplete and has not considered all proposals within the context of the Municipal Comprehensive Review.

Additional Comments

For the reasons already expressed in our client's January 9, 2020 Request, we remain of the opinion that the Conversion Request appropriately satisfies all of the conversion criteria as set forth by the Growth Plan and the Regional Municipality York, and should be granted.

In our opinion, there is still ample time for staff to undertake a comprehensive review our client's request and incorporate those findings in an update Recommendation Report. Further, Martingrove North Properties Inc. and Martingrove South Properties Inc. wishes to ensure that the ongoing Employment Area Conversion exercise does not preclude some landowners from submitted site-specific request for their lands. It is our expectation that Regional Staff will cooperate in the processing and review of such requests in a manner that is fair and equitable.

Further, the updated 2041 *Growth Plan* forecast numbers and new Provincial Land Needs Methodology have not been released by the Province. It is our understanding that the final methodology will be used by municipalities to determine the amount of land needed to accommodate future growth. It will also inform decisions about whether to expand the boundary of urban areas (settlement area boundary expansion), or whether sufficient or surplus land has already been identified. The methodology also informs decisions about whether lands in employment areas can be converted to non-employment uses. In general, the pending growth targets and standardized approach for assessing land needs are critical guiding tools for the Region in order to prepare an accurate assessment of employment needs and whether or not employment land is appropriate for conversion.

Lastly, Vaughan Council has not yet indicated its position on employment area planning, including site-specific conversion requests like our client's. In our opinion, it is important to understand Staff's position at a local context in order to provide additional guidance and more nuanced evaluation prior to advancing recommendations for conversion.

For the reasons stated above, we respectfully submit that **any Staff recommendation on the Request is premature** at this time.

Neither a Staff nor a Council position on conversion requests should be taken until these things happen and we request staff consider our client's request with the additional time.

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We reserve the right to provide further comments at that time. Thank you for considering of our comments.

Yours sincerely,
HUMPHRIES PLANNING GROUP INC.



for

Rosemarie Humphries, BA, MCIP, RPP
President

cc: Mr. Bill Kiru, Acting Deputy City Manager, City of Vaughan
Mr. Paul Bottomley, Manager of Policy, Research and Forecasting
Martingrove North Properties Inc. and Martingrove South Properties Inc
Mayor and Members of Vaughan Council