

September 8, 2020

Chairman Emmerson and Members of Regional Council

c/o Mr. Christopher Raynor
Regional Clerk
Regional Municipality of York
Regional Corporate Services Department
Administrative Centre
17250 Yonge Street, 4th Floor
Newmarket, Ontario
L3Y 6Z1

Dear Chairman Emmerson Regional Council Members:

**RE: SEPTEMBER 17, 2020 SPECIAL COUNCIL MEETING
 REQUEST FOR CONVERSION OF EXISTING EMPLOYMENT LANDS – REQUEST A6
 NORTHWEST CORNER OF WELLINGTON STREET EAST AND HIGHWAY 404
 OUR FILE 07132BP**

On behalf of our clients, Whitwell Developments Limited (a member of the Penguin Group of Companies), please accept this letter as our submission related to the conversion of Employment Lands in the Town of Aurora located at the northwest corner of Wellington Street East and Highway 404 (the “subject lands”). The subject lands are located to the east of the existing shopping centre and only gain access through the shopping centre.

On May 1, 2019 we made a formal request to the Region for conversion of the subject lands, which was subsequently revised on August 13, 2019 per the attached letter to Mr. Freeman. The proposed conversion request was to allow for 4.35 hectares (10.74 acres) of land to be converted to allow for a mix of office and residential uses, with office uses being maintained along the Highway 404 frontage. The proposal would generate 2,346 people and jobs in the overall mixed use development of which 1,142 jobs would be located within the subject lands post-conversion.

Regional staff, through their review, did not agree with the request for conversion.

While Town of Aurora Council has not yet made a decision on the requested conversion, we note that in a report dated December 3, 2019 (Report No. PDS19-069) that Town staff were supportive of the request by our client per their commentary below (our emphasis added).

“Staff are prepared to support this request for conversion on the basis that the proposed office uses be generally developed at the scale and density referenced above, and do not represent a reduction in office employment. This should include phasing policies that require the construction of a certain percentage of office space prior to the issuance of the first building permit for the residential uses. As part of the local planning process, staff will ensure that the appropriate policies are implemented to address issues such as compatibility, recreational/open space, access and traffic. Any future proposed development application on this site will be thoroughly reviewed against Official Plan policy. No net loss of jobs is critical for staff to support this request.”

Our client is supportive of Town’s staff’s position, including the requirement for a phasing policy.

We therefore are requesting, for the reasons outlined in our August 13, 2019 submission, that Regional Council allow for the conversion of the 4.35 ha (10.74 acre) parcel, subject to a phasing policy being implemented through a future Town Official Plan Amendment as requested by the Town.

Our clients will be making a deputation to Regional Council on this submission.

Thank you.

Yours truly,

MHBC



David A. McKay, MSc, MLAI, MCIP, RPP
Vice President and Partner

cc: Clients

Encl.

August 13, 2019

Paul Freeman, MCIP, RPP
Regional Municipality of York
17250 Yonge Street
Newmarket, ON
L3Y 6Z1

Dear Mr. Freeman:

**RE: FORMAL REQUEST FOR CONVERSION OF EXISTING EMPLOYMENT LANDS
NORTHWEST CORNER OF WELLINGTON STREET EAST AND HIGHWAY 404
WHITWELL DEVELOPMENTS LIMITED
OUR FILE 07132BP**

This submission has been prepared and submitted in support of a request to the Region of York for an employment land conversion as a part of the Region's municipal comprehensive review analysis. The request is being made on behalf of Whitwell Developments Limited for the approximately 8.33 hectares (20.59 acres) of land located at the northwest corner of Highway 404 and Wellington Street East in the Town of Aurora. (the "Subject Lands") The request for conversion relates to only a portion of the Subject Lands reserving the balance for office uses.

An original Request for Conversion was submitted on May 1, 2019 for the Subject Lands and the Aurora North Shopping Centre to the west however following discussions with the Town of Aurora we have revised the proposal to only the Subject Lands. The revised request has reduced the area subject to the conversion substantially, now being approximately 4.35 hectares (10.74 acres).

Prior to submitting the original Formal Request for Conversion a meeting between Region of York Staff and Whitwell Developments Limited took place on April 1, 2019 to discuss this Application. The take aways from this meeting include that the Region has a mandate to determine if employment is required for the region, that emphasis should be placed on preserving employment uses along 400 series highways, and that the conversion of these lands shall not impact long term employment lands supply. In addition, Whitwell Developments Limited has met with the Town of Aurora to discuss the request. The proposal being submitted is based on these comments.

The proposal for conversion would allow the establishment of mixed use development (the "Mixed Use Development"). This conversion, if permitted, will promote a range of employment and residential uses, cohesiveness through the creation of a live-work setting, healthy sustainable employment uses adjacent to Highway 404 right-of-way, and leveraging existing municipal

infrastructure. The proposed Mixed Use Development would be in line with Provincial policy direction for the establishment of compact, mixed- use, integrated employment areas and healthy, liveable and complete communities.

A land use concept has been prepared in support of the request for conversion which can be found in **Appendix A**. The concept envisions an overall Mixed Use Development that accommodates a mix of office and residential space within a more favorable live-work environment, and open space areas. The proposed buildings frame an internal street network. This proposal will generate 2,346 people and jobs in the overall mixed use development of which 1,142 jobs would be located within the Subject Lands post-conversion. This is in addition to the jobs created by the shopping centre to the west of the Subject Lands.

This letter report evaluates the applicable land use policy that provides for the consideration of conversion, and concludes that the request maintains consistency with the Provincial Policy Statement (2014), conformity with the Growth Plan (2017), Region of York Official Plan and Town of Aurora Official Plan as it relates to employment lands while providing for a greater range of land uses on the Subject Lands through the conversion request.

DESCRIPTION OF THE SUBJECT LANDS

The Subject Lands are located within the eastern Aurora Urban Area boundary (**Figure 1**), south of a vacant field and office building, east of the existing Aurora North shopping centre, west of the southbound off ramp from Highway 404 to Wellington Street East, and north of the southbound off ramp from Highway 404 to Wellington Street East. The lands are vacant without any grading constraints and absent of any development.

SURROUNDING CONTEXT DESCRIPTION

Surrounding land uses include: (**Figure 2**).

NORTH – an open space area that is part of a larger property containing an office building and a large surface parking lot;

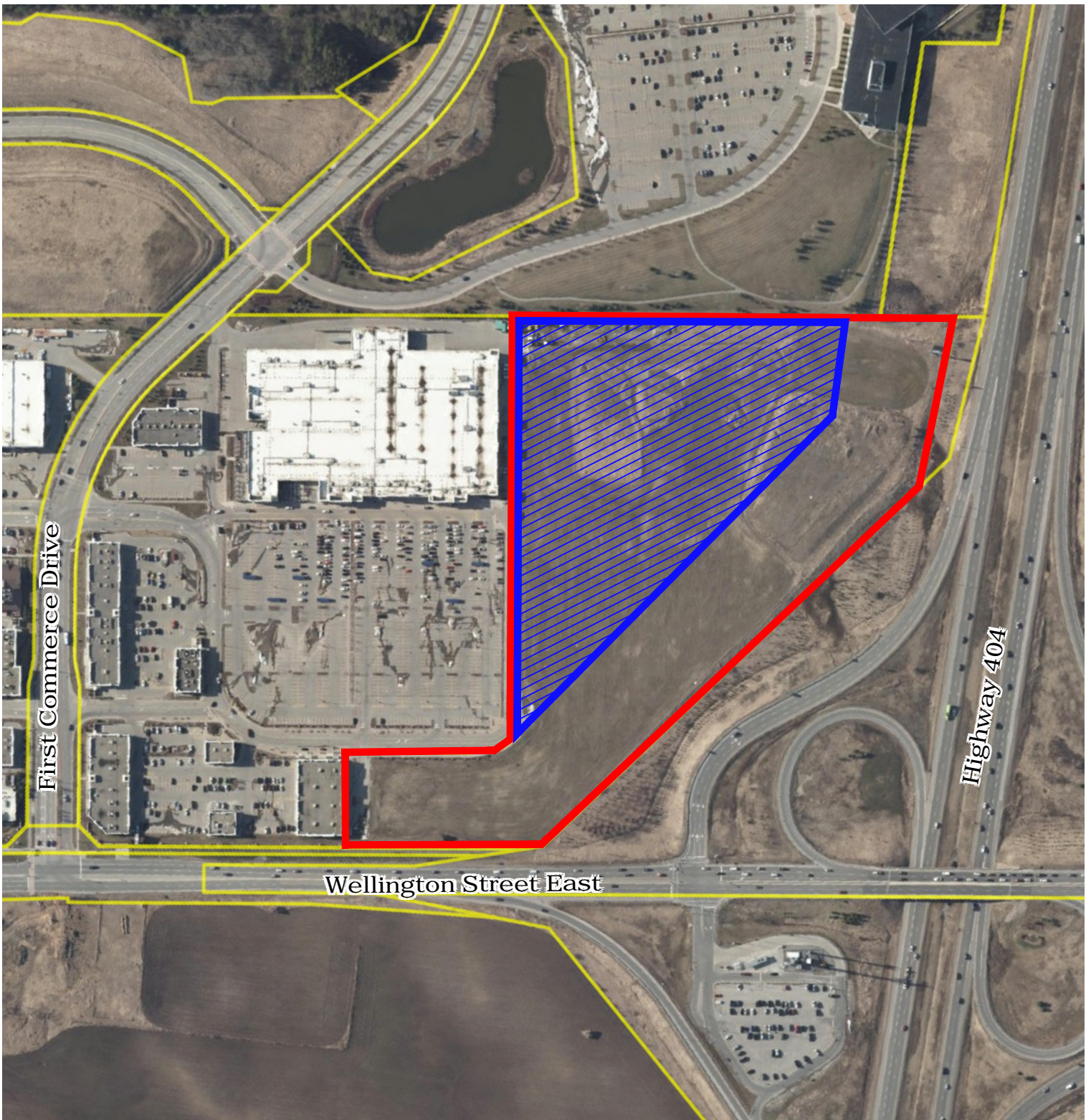
EAST – The southbound off ramp from Highway 404 to Wellington Street East, and Highway 404;

SOUTH - The southbound off ramp from Highway 404 onto Wellington Street East, and Wellington Street East; and

WEST – A Walmart Superstore and other retail uses, all forming part of the Aurora North shopping centre.

PROPOSED FUTURE VISION FOR A MIXED USE DEVELOPMENT

As mentioned previously, the proposal for conversion envisions the Subject Lands contributing to an overall Mixed Use Development that accommodates a mix of office and residential space within a live-



Data Source: First Base Solutions Aerial Flown 2018

Figure 1

Aerial Photograph with Lands Subject to Conversion

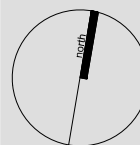
Wellington Street East and Highway 404, Town of Aurora, Ontario

LEGEND

- Subject Lands
- Lands Subject to Conversion

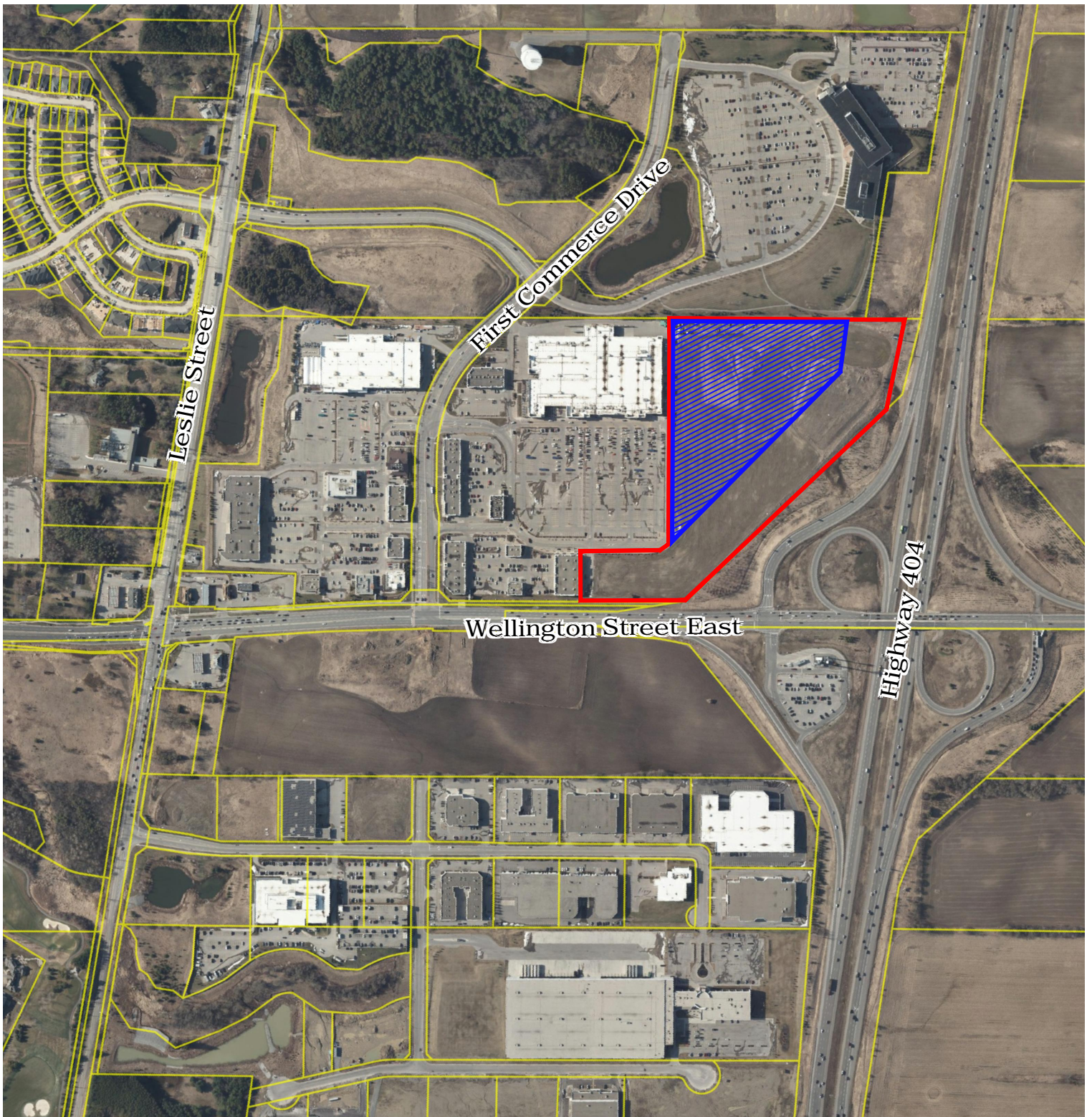
DATE: April 29, 2019

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Data Source: First Base Solutions Aerial Flown 2018

Figure 2

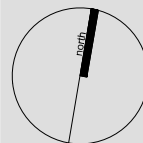
Surrounding Context Map

LEGEND

- Subject Lands
- Lands Subject to Conversion

DATE: April 29, 2019

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**Wellington Street East
and Highway 404,
Town of Aurora, Ontario**

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work type of environment (**Figure 3**). The proposed concept of the Mixed Use Development is provided in **Appendix A**. To achieve this vision, the following is proposed:

The proposed mixed use infill development is in the form of office buildings located adjacent to Highway 404 with residential buildings interior and adjacent to the existing Walmart Superstore and parking area. The proposal includes a range of building heights and densities with proposed building heights of 4 storeys for the office buildings and 6 storeys for the residential buildings. The five proposed office buildings will be located along the southbound off ramp from Highway 404, with the four proposed residential buildings located along the western portion of the Subject Lands. The proposed buildings contain a total density of 95,318 sq. m. (1,026,000 sq. ft.) to provide for a higher density, compact built form. The proposed office buildings frame the Highway 404 off ramp with the residential buildings located more internal to the Subject Lands. The proposed building locations allow for compatibility between the proposed uses and the surrounding land uses and the office buildings will provide some screening for the proposed residential buildings to the west from Highway 404. The residential buildings are intended to be developed with rental tenure as a primary focus, however, this is subject to the market conditions at the time of development.

Proposed access to the private internal driveway system for the mixed use development will be provided through the existing internal private drive of the Shopping Centre to the west. As this private drive contains a wide right-of-way, there will also be an opportunity to convert this existing drive to a public street. Proposed parking areas will be provided as surface parking spaces throughout the site and within underground parking garages.

Common amenity space serving the office buildings is being provided along the eastern perimeter of the site with additional green spaces located internal to the site between the residential buildings.

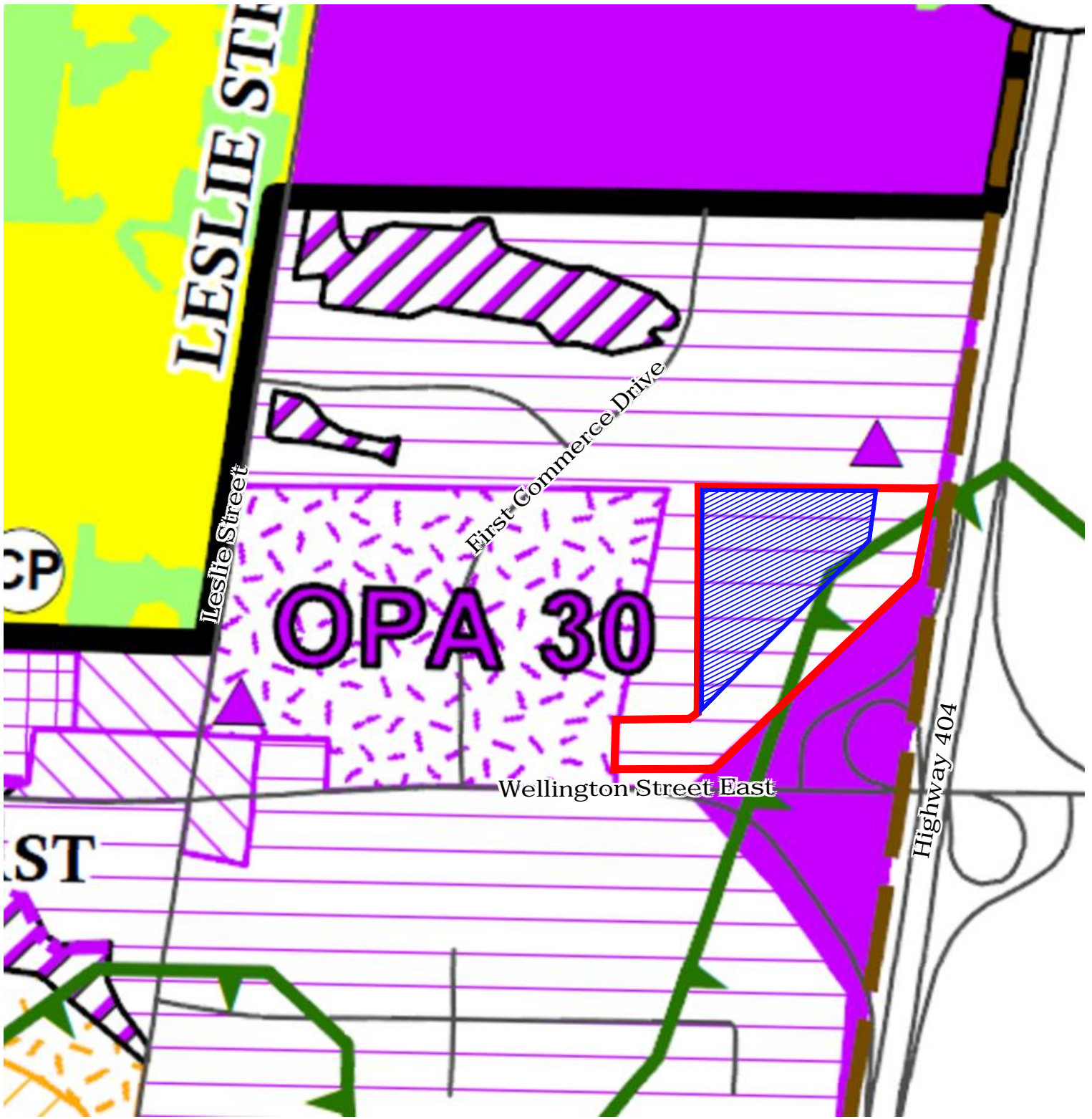
The proposed gross floor areas related to the overall mixed use development on the Subject Lands are as follows:

Office

• Office Building 1	7,803 sq. m	(84,000 sq. ft.)
• Office Building 2	7,803 sq. m	(84,000 sq. ft.)
• Office Building 3	7,803 sq. m	(84,000 sq. ft.)
• Office Building 4	7,803 sq. m	(84,000 sq. ft.)
• Office Building 5	7,803 sq. m	(84,000 sq. ft.)
• Total Office	39,019 sq. m	(420,000 sq. ft.)

Residential

• Residential Building 1	9,476 sq. m	(102,000 sq. ft)
• Residential Building 2	11,148 sq. m	(120,000 sq. ft)
• Residential Building 3	17,837 sq. m	(192,000 sq. ft)
• Residential Building 4	17,837 sq. m	(192,000 sq. ft)
• Total Residential	56,299 sq. m	(606,000 sq. ft.)



Data Source: Town of Aurora Official Plan Schedule 'A' (2002)

Figure 3

**Town of Aurora
Official Plan**

**Schedule 'A'
Structure Plan**

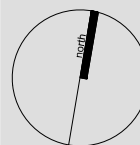
**Wellington Street East
and Highway 404,
Town of Aurora, Ontario**

LEGEND

- | | | |
|---|--|--|
|  Subject Lands |  Greenlands Employment |  Linear and Other Open Space |
|  Lands Subject to Conversion |  Business Park |  Stormwater Management Facility |
|  Greenlands System |  Business Park - Regional Commercial Centre |  Oak Ridges Moraine Boundary |
|  Greenfield Residential |  Community Commercial | |

DATE: April 29, 2019

SCALE: 1:7500



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- Total Building Area 95,318 sq. m (1,026,000 sq.ft)
- Floor Space Index 1.14 FSI

A total of 644 units are proposed as part of the residential buildings, providing for an approximate population of 1,204 people. A total of 1,142 jobs are anticipated within the office development contemplated along Highway 404.

REVIEW OF APPLICABLE POLICY AND REGULATORY FRAMEWORK

The Subject Lands are located within the eastern Aurora Settlement Area, outside of the built boundary within designated Greenfield Areas. The Subject Lands are designated Urban Area in the Region of York Official Plan, which directs new development to a minimum of 40 per cent residential intensification within the built-up area by 2015 and beyond.

The Subject Lands are located within the Bayview Northeast Area 2B Secondary Planning area (OPA 30) and are designated Business Park in the Town Official Plan (“Town OP”). The Business Park designation permits an integrated mix of employment activities and businesses that occur within buildings and on sites that are designed, and landscaped to present a high quality, prestige image. This includes business and professional offices as of right, and limited retail and service commercial and restaurant uses as part of a hotel, a motel, or an office building and subject criteria. Business Park lands shall be planned, designed and built in an integrated campus-like setting to create a striking built presence on Highway 404 and Wellington Street East. Buildings shall generally be low to mid-rise in form and shall generally not exceed four storeys in height, except at key intersection locations on Wellington Street, where building heights may increase to seven storeys provided such an increase is considered appropriate as articulated in the Urban Design Guidelines. In addition, increased building height beyond seven storeys can be considered for buildings adjacent to Highway 404 through a re-zoning application.

The following is an identification of the applicable land use policy that the Subject Lands must consider as part of any potential conversion of employment lands.

PROVINCIAL POLICY STATEMENT 2014

The 2014 Provincial Policy Statement (the “PPS”) was approved by the Ministry of Municipal Affairs and Housing on April 30th, 2014 and is applicable to the Town of Aurora. The PPS provides general policy direction in matters relating to land use planning and development. The PPS outlines policy for Ontario’s long term prosperity, economic health and social well-being. These directives help to inform Municipalities’ Official Plans and Zoning By-laws, which then allow for the efficient use of lands and development patterns that support strong, livable and healthy communities that protect the environment and public health and safety, and facilitate economic growth.

Building strong healthy communities is one of the key policy directives of the PPS as found in Section 1.0. It helps to inform the management and promotion of efficient development and land use patterns for accommodating an appropriate mix of residential, employment, institutional, recreation, park and open space uses and improving accessibility by removing land use barriers in order to create livable communities. The policies support the promotion of healthy, livable and safe communities through

such matters as intensification, land use compatibility, provision of housing, and the efficient use of public services and infrastructure.

In particular, Policy 1.3.1 of the PPS promotes economic development and competitiveness by providing an appropriate mix and range of employment uses, maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, encouraging compact, mixed-use development to support liveable and resilient communities, and ensuring the necessary infrastructure is in place for current and projected needs.

Furthermore, Policy 1.3.2.2 states that planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.

Finally, Policy 1.3.2.3 states that planning authorities shall protect employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations.

GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE 2017

The Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”) was approved by the Province of Ontario on June 16th, 2006 and amended July 1, 2017.

The Growth Plan sets out policies to manage growth in the Greater Golden Horseshoe to achieve compact, complete communities in the future. Similar to the PPS, the objectives of the Growth Plan are to create complete, healthy and safe communities with a focus on intensification in settlement areas and optimizing the use of existing infrastructure. The policies within Section 2.2 of the Growth Plan speak to achieving these objectives.

Schedule 3 of the Growth Plan forecasts a population of 1,590,000 and 790,000 jobs for the Region of York for 2031, increasing to 1,790,000 and 900,000, respectively, by 2041. Census data indicates that the population of the Region of York in 2016 was 1,109,909.

The policies within Section 2.2 discuss the management of growth to accommodate a greater number of people and jobs in order to build complete, compact and transit-oriented communities through the better use of land and infrastructure. Policies within the Growth Plan require development to support and achieve complete communities, within walking distance and accessible for residents and employees.

Policy 2.2.5.1 of the Growth Plan states that economic development and competitiveness in the Greater Golden Horseshoe will be promoted by making more efficient use of employment lands, providing a variety of employment to accommodate forecasted growth, aligning employment densities with transit and ensuring that economic goals and strategies are considered to retain and attract investment and employment.

Policy 2.2.5.7 requires municipalities to plan for the integration of employment areas with adjacent non-employment areas and developing vibrant, mixed-use areas and innovation hubs, where appropriate.

Policy 2.2.5.9 states that 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;
- b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;
- c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;
- 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
- e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.

Policy 2.2.7.2 provides that designated greenfield areas be planned to achieve within the horizon of this Plan a minimum density target that is not less than 80 residents and jobs combined per hectare. Notwithstanding this, 2.2.7.4 states that minimum density targets that were approved prior to July 1, 2017 will continue to apply and must be updated to not less than 60 jobs and people per hectare at the next municipal comprehensive review.

REGION OF YORK OFFICIAL PLAN

The Regional Municipality of York adopted an updated Regional of York Official Plan in December of 2009, which was approved by the Province of Ontario on September 7, 2010, and was subsequently appealed to the Ontario Municipal Board (OMB). Since that time, the York Region Official Plan 2010 (hereinafter as "YROP") has been partially approved by the OMB for conformity with the PPS and Growth Plan.

YROP directs growth to occur in an orderly fashion so that healthy and complete, sustainable communities within livable urban environments can be achieved to live in harmony with the natural environment and meet the social and economic needs of current and future residents.

The Subject Lands are designated as "Urban Area". Urban Areas are planned to support communities that are compact, well-designed and lively to be socially inclusive, environmentally sustainable, and economically vibrant. Urban Areas aim to accommodate a significant portion of the planned growth in the Region through intensification.

In addition, YROP identifies that intensification and growth will occur in Urban Areas promoting well-designed and intensified built form for new commercial, industrial and institutional developments. Commercial buildings are to be carefully designed in a compact form to be pedestrian and transit supportive. Multi-storey buildings are encouraged where appropriate.

Section 4.0 of the YROP provides policy direction on the Region's economic vitality. Policy 4.3.2 states that a sufficient supply of employment lands based on the applicable municipal comprehensive review will be maintained to accommodate the employment growth forecasts as per Section 5.0 projections.

Policy 4.3.9 states that the conversion of employment lands to non-employment land uses may only be considered, at the time of a municipal comprehensive review in accordance with the applicable policies and population/employment forecasts of the Region.

Policy 4.3.10 requires local municipalities to include employment land conversion policies within local official plans and secondary plans that are consistent with the employment land conversion policies of the Province and the Region.

Policy 4.3.16 states that development on fully serviced employment lands be compact and achieve a region-wide average minimum density of 40 jobs per hectare in the developable area.

Policy 4.3.19 states that the Region is to work with local municipalities to review and monitor opportunities for employment land intensification.

Finally, the Region recently adopted Employment Area Conversion Criteria to evaluate requests for conversion. The conversion criteria which builds on the Growth Plan conversion criteria is as follows:

6. The following employment areas will not be considered for conversion as they have not yet had the opportunity to develop due to servicing constraints or have recently been brought into the urban boundary to accommodate employment land employment growth to 2031: Keswick Business Park, Queensville, Highway 404 (ROPA 1), ROPA 3, and Highway 400 North (ROPA 52).

7. The conversion will not be considered if the entire perimeter of the site is surrounded by lands designated for employment uses.

8. Conversion of the site would not compromise the Region's and/or local municipality's supply of large sized employment area sites (i.e. 10 ha or greater) which allow for a range uses including but not limited to land extensive uses such as manufacturing, warehousing, distribution and logistics.

9. The conversion will not destabilize or adversely affect current or future viability and/or identity of the employment area with regards to:

- a) Hindering the operation or expansion of existing or future businesses
- b) Maintaining lands abutting or in proximity to the conversion site for employment purposes over the long term
- c) Attracting a broad range of employment opportunities and maintaining clusters of business and economic activities
- d) Providing appropriate buffering of employment uses from non-employment uses.

10. The conversion to a non-employment use is compatible with the surrounding uses such as existing employment uses, residential or other sensitive land uses and will mitigate existing and/or potential land use conflicts.

11. The site offers limited development potential for employment land uses due to factors including size, configuration, access and physical conditions.

12. The proposed site is not adjacent to 400-series highways, or is not located in proximity to existing or planned highways and interchanges, intermodal facilities, airports and does not have access to rail corridors

13. The proposed conversion to a non-employment use does not compromise any other planning policy objectives of the Region or local municipality.

14. Cross-jurisdictional issues have been addressed.

Section 5.0 of the YROP (An Urbanizing Region) anticipates that the Region will reach a population of 1.5 million people, 780,000 jobs, and 510,000 households by 2031. Aurora's projected growth within this share of Regional growth is anticipated to be 70,200 people and 34,200 jobs by the year 2031, specifically a job growth of approximately 5,200 jobs from 2016 to 2031.

Policy 5.2.5 requests that a balance of residential and employment uses be provided throughout the Region to improve the possibilities for working and living in close proximity.

Policy 5.2.7 requires that communities be designed to ensure accessibility to people of all ages, cultures and abilities.

Policy 5.2.9 encourages retail, commercial, office, and institutional structures be carefully designed in a compact form and be pedestrian-oriented, transit-supportive, and multi-storey where appropriate.

Policy 5.2.14 require that the designated greenfield area achieve an average minimum density that is not less than 50 residents and jobs per hectare combined in the developable area.

TOWN OF AURORA OFFICIAL PLAN

The Official Plan ("OP") was approved by York Region in 2012 and most recently consolidated in 2015.

The Subject Lands are located within the Bayview Northeast Area 2B. As a result, the land use designation for the Site is governed by the Bayview Northeast Area 2B Secondary Plan Area (OPA 30), which is the urban expansion area of the Town of Aurora. The Subject Lands are designated Business Park as shown in **Figure 4**.

Section 10.0 of the OP provides direction on "Advancing the Economy" including conversion of employment. Specifically, Policy 10.4(a) of the Town OP states applications to convert lands designated Employment Area to a residential use, retail use or any other nonemployment use that is not permitted by this Plan within any Employment Area designation or that is not ancillary or accessory to a permitted Employment Area use shall be assessed on the basis of a Regional Municipal Comprehensive Review. In addition to the Regional Comprehensive Review, the Town shall ensure that:



Data Source: Proposed Concept Plan (2019)

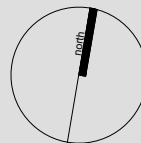
Figure 4 Mixed Use Development

LEGEND

- Subject Lands
- Lands Subject to Conversion

DATE: August 15, 2019

SCALE NTS



Wellington Street East
and Highway 404,
Town of Aurora, Ontario

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- there is a demonstrated need for the conversion, including a detailed review of any significant shortfall in the inventory of land designated for the proposed land use;
- the lands are not required over the long-term for the employment purposes for which they are designated and that the municipality will meet the employment forecasts allocated to the municipality pursuant to this Plan;
- the conversion will not jeopardize the ability of the Town to achieve the Town-wide activity rate of 1 job for every 2 residents;
- the conversion will not adversely affect the overall viability of the area designated Employment Area;
- there is existing or planned infrastructure to accommodate the proposed conversion;
- cross-jurisdictional issues have been considered;
- the proposed use is compatible with adjacent land uses; and,
- there is no past on-site contamination that would negatively impact the proposed use or future users of the site.

RATIONALE FOR CONVERSION AND ANALYSIS RELATIVE TO APPLICABLE CRITERIA

We have considered the applicable tests for conversion of employment lands to non-employment purposes as outlined in the Provincial Policy Statement, Growth Plan, Region's Official Plan, and the Town's Official Plan. The following is a summary of our analysis.

Growth Plan for the Greater Golden Horseshoe 2017

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

Relative to the need, the proposal for conversion will not detract from the Region and Town's population and employment projections, rather achieving this goal through a more compact and higher density form utilizing a more efficient absorption of land area. As a result, the size of land preserved for strictly employment purposes exceeds the need, primarily the result of a shift from traditional lower density manufacturing and warehousing towards higher density office employment.

The Growth Plan requires that minimum density targets that were approved prior to July 1, 2017 will continue to apply and must be updated to not less than 60 jobs and people per hectare at the next municipal comprehensive review. The Region of York Official Plan was approved in 2010 and therefore the minimum density targets within this Plan apply. Section 4 of the Region of York Official Plan relates to "Economic Vitality" and Policy 4.3.16 states that development on fully serviced employment lands be compact and achieve a region-wide average minimum density of 40 jobs per hectare in the developable area. This ratio would have been used by the Region and Town in determining their employment projections and therefore can be used to determine the minimum number of jobs

required for the Subject Lands. It can be considered the base case scenario. Based on the site area of 8.330 hectares (20.59 acres), this results in a requirement of 333 jobs on the Subject Lands within the base case scenario. Further, when based on the minimum density of 60 jobs and people per hectare which is to be used at the next municipal comprehensive review, this results in a requirement of 499 jobs and people on the Subject Lands.

The proposed development has been designed to contain a higher density than a traditional lower density employment use and can be considered to be compact. This proposal includes 39,019 sq. m. (420,000 sq. ft.) of office space and 644 residential units. Appendix A of the Town of Aurora Development Charges Study, dated January 24, 2019, shows employment densities that have been used to convert the employment forecasts into building space estimates to determine the number of jobs that can be produced based on building size. In addition, it indicates the population projections per type of unit that have been used to forecast the number of people anticipated based on the number of proposed units. This shows an estimate of 461 sq. ft. (42.82 sq. m) per employee of commercial/population-related uses 950 sq. ft. (88.25 sq. m) per employee for traditional industrial employment uses and a population forecast for apartment uses of 1.837 persons per unit. In addition, the Region of York 2018 Development Charge Study shows these employment densities as 25.5 sq. m per employee of office uses, 74.32 sq. m per employee of industrial uses, and 1.91 persons per unit for apartment uses. When these numbers are blended, this results in ratios of 34.16 sq. m per office employee, 81.28 sq. m per industrial employee, and 1.87 persons per unit for apartment uses. This results in the number of forecasted office jobs of 1,142, which when compared to the 333 jobs in the base case scenario under the Region's and Town's forecasted number of employees (based on 40 jobs per hectare), increases the number of office jobs by 809. In addition, this results in a population of 1,204 people, which when combined with the number of jobs forecasted results in 2,346 jobs and people on the subject lands and exceeds the Region and Town forecasted numbers by 2,013.

In addition, these planned numbers can be utilized to determine the differences in development charges and building permit fees between the base case scenario and the proposed development as follows:

- Based on current Development Charges of \$55,390 per residential unit and \$292.89 per sq. m. of office area, this proposal would generate higher Development and Educational Development Charges revenues, estimated at a total of \$47.1 million within the Subject Lands. In comparison, the base case scenario of traditional employment would generate at a total of \$7.92 million in Development Charges and Educational Development Charges on the Subject Lands.
- Based on Building Permit fees of \$13.50 per sq. m. for residential, \$7.15 per sq. m. for industrial, and \$10.50 per sq. m. for business and personal services, this proposal would generate \$1,169,736.00 in building permit revenues within the Subject Lands. In comparison, the base case scenario of traditional employment would generate \$193,523.62 in building permit revenues on the Subject Lands.

Furthermore, the Subject Lands are not located in an ideal location that would be suited to attracting traditional industrial businesses, including manufacturing, assembly, and distribution warehouse. The Subject Lands are located within close proximity of Highway 404, however, due to the Highway 404

southbound off-ramp onto Wellington Street East directly adjacent to the Subject Lands, the only point of access into the Subject Lands is through the existing retail commercial centre to the west. This would require truck traffic to transverse through the commercial centre before reaching the Subject Lands. This location does not support employment uses focusing on major goods movement facilities and does not present itself as a logical location to accommodate that distribution. This area lends itself to more business and professional office jobs that tend to require less land area and no heavy truck movements, and that are compatible with the existing commercial uses. Finally, business and professional office jobs are moving towards lifestyle-oriented environments where employment and non-employment purposes are integrated to archive a dynamic live-work environment. Based on geography, trends and intensification objectives, there is a need for the conversion.

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

Based on the employment planned to be generated by the proposal, the Subject Lands will result in a net increase of jobs in comparison to the target of 40 jobs per hectare, thereby confirming the Subject Lands as being surplus to the Town and Region's employment land needs by accommodating jobs through more compact built form and therefore more efficiently utilizing lands and optimizing services. Furthermore, the York Region 2017 Vacant Employment land Inventory report indicates that there has been a consistent trend of decreasing absorption rates in the Region's employment lands, reinforcing the trend toward service type employment. This surplus on the Subject Lands can support the employment uses through the Mixed Use Development as compatible residential and non-residential uses, reflecting a compact built form that conforms to applicable policy. The existing employment area if developed at the minimum required rate would yield 333 jobs on the Subject Lands whereas the proposal for an enhanced mixed use development would achieve 1,142 jobs on the Subject Lands, an increase by 809 jobs over the minimum required rate.

The existing Business Park designation applying to the Subject Lands permits business and professional office uses in an integrated campus-like setting with building heights along Highway 404 permitted up to 4 storeys as of right with an option to increase to 7 storeys through a re-zoning. The proposed office buildings along the eastern portion of the site provide these types of office uses including providing a number of jobs that are over and above the minimum required number of jobs forecasted by the Region and the Town. Although the entire site can be planned with office uses to increase the number of jobs, in our opinion it is more appropriate to provide for a mixed-use, complete community, and cohesiveness through the creation of a live-work setting along this major arterial street.

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

As noted previously, the subject lands will continue to achieve 1,142 jobs based on current trends of business and professional office-type jobs, exceeding the jobs of traditional employment which had been anticipated for this employment area.

- 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 overall vision for the Mixed Use Development has the potential to achieve approximately 1,142 jobs, the majority of which will occur in a compact, urban form at a density of 137 jobs per hectare (overall 279 people and jobs per hectare). The shift in employment trend from manufacturing and warehousing to service-based employment which typically occurs in a higher density form ensures the employment area continues to be viable and relevant for long term growth and economic development. In addition, the employment area to the north of the subject lands is already isolated from the employment lands to the south as a result of the major arterial road of Wellington Street East and due to no access from the subject lands directly onto Wellington Street East. Therefore, the Mixed Use Development would not detract from the overall employment area nor the ability to achieve appropriate densities but would maintain employment uses along Highway 404 in the form of office uses to ensure that employment uses can continue to be accommodated in this area. The redesignation of the employment lands along the western portion of the Subject Lands would ensure compatibility with the commercial uses to the west.

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

The Subject Lands are adjacent to an existing shopping centre that includes existing water, wastewater and stormwater services. Furthermore, the No. 33 Wellington bus line runs westerly along Wellington Avenue from the Aurora North Shopping Centre directly west of the Subject Lands to Wellington Street East and Murray Drive, providing a connection to the Aurora GO Station. Access to the existing GO commuter parking lot is less than 600 m away from the subject lands to the east.

Region of York Official Plan

With respect to the Employment Area Conversion Criteria as provided by the Region of York, those criteria have been addressed as follows:

- 6. The following employment areas will not be considered for conversion as they have not yet had the opportunity to develop due to servicing constraints or have recently been brought into the urban boundary to accommodate employment land employment growth to 2031: Keswick Business Park, Queensville, Highway 404 (ROPA 1), ROPA 3, and Highway 400 North (ROPA 52).*

The Subject lands are not within these areas.

- 7. The conversion will not be considered if the entire perimeter of the site is surrounded by lands designated for employment uses.*

As established previously, the entire perimeter of the Subject Lands is not surrounded by lands designated for employment purposes. Only portions of the north abut designated employment lands. The remainder of the lands abut a Regional Commercial Centre and roads/highways.

8. Conversion of the site would not compromise the Region's and/or local municipality's supply of large sized employment area sites (i.e. 10 ha or greater) which allow for a range uses including but not limited to land extensive uses such as manufacturing, warehousing, distribution and logistics.

The size of the Subject Lands at 8.33 hectares is less than 10 hectares in size and therefore this criterion is not applicable.

9. The conversion will not destabilize or adversely affect current or future viability and/or identity of the employment area with regards to:

- a) Hindering the operation or expansion of existing or future businesses*
- b) Maintaining lands abutting or in proximity to the conversion site for employment purposes over the long term*
- c) Attracting a broad range of employment opportunities and maintaining clusters of business and economic activities*
- d) Providing appropriate buffering of employment uses from non-employment uses.*

The following responds to each of the above items separately:

- a) The overall nature of the Mixed Use Development will promote a range of office uses that will ensure that the overall viability of this employment area is maintained. In addition, the proposed Mixed Use Development is compatible with the office use to the north. An opportunity remains for additional employment uses to be located on the vacant open fields to the north. Therefore, the Mixed Use Development will not hinder the operation or expansion of existing or future businesses but is compatible with them.
- b) The Mixed Use Development includes office uses along the eastern portion of the site, east of the conversion lands, which will ensure employment uses are maintained over the long term. The proposed residential uses on the conversion lands will be compatible with the proposed office uses on the Subject Lands and on the lands to the north, and with the commercial use to the west.
- c) The Mixed Use Development will provide the opportunity to attract a broad range of office employment opportunities within the proposed offices buildings.
- d) The location of the proposed residential buildings along the western portion of the Subject Lands will also provide appropriate transition between the office uses and Highway 404 and the existing commercial shopping centre.

10. The conversion to a non-employment use is compatible with the surrounding uses such as existing employment uses, residential or other sensitive land uses and will mitigate existing and/or potential land use conflicts.

The proposed residential uses along the western portion of the Subject Lands are compatible with the office development proposed along Highway 404 and will provide a transition from these uses and Highway 404 to the existing commercial shopping centre to the west.

11. The site offers limited development potential for employment land uses due to factors including size, configuration, access and physical conditions.

The Subject Lands are not located in an ideal location that would be suited to attracting traditional industrial businesses, including manufacturing, assembly, and distribution warehouse. The Subject Lands are located within close proximity of Highway 404, however, due to the Highway 404 southbound off-ramp onto Wellington Street East directly adjacent to the Subject Lands, the only point of access into the Subject Lands is through the existing retail commercial centre to the west. This would require truck traffic to transverse through the commercial centre before reaching the Subject Lands. This location does not support employment uses focusing on major goods movement facilities and does not present itself as a logical location to accommodate that distribution. This area lends itself to more business and professional office jobs that tend to require less land area and no heavy truck movements, and that are compatible with the existing commercial uses. Finally, business and professional office jobs are moving towards lifestyle-oriented environments where employment and non-employment purposes are integrated to achieve a dynamic live-work environment. Based on geography, trends and intensification objectives, there is a need for the conversion.

12. The proposed site is not adjacent to 400-series highways, or is not located in proximity to existing or planned highways and interchanges, intermodal facilities, airports and does not have access to rail corridors

The lands subject to conversion are located west of the office uses and not adjacent to Highway 404.

13. The proposed conversion to a non-employment use does not compromise any other planning policy objectives of the Region or local municipality.

The proposal for conversion only relates to the western portion of the employment area, continuing to maintain the eastern portion of the employment area for employment related purposes. The proposal to establish this Mixed Use Development is in line with both Provincial, Regional and Town policy objectives with achieving complete communities, promoting diversified employment areas, growth through infilling and intensification and live-work opportunities that optimize reduced transportation patterns.

14. Cross-jurisdictional issues have been addressed.

There are no cross-jurisdictional issues or conflicts resulting with the conversion of these lands

Town of Aurora Official Plan

With respect to the Employment Area Conversion Criteria as provided by the Town of Aurora which are not similar to the above and which have not already been addressed above, those criteria have been addressed as follows:

- *the conversion will not jeopardize the ability of the Town to achieve the Town-wide activity rate of 1 job for every 2 residents;*

Based on the employment and population forecasts, the proposed Mixed Use Development will provide for 1,142 jobs and 1,204 people. The proposal assists the Town in continuing to achieve its activity rate target by providing more jobs than population on the Subject Lands.

- there is no past on-site contamination that would negatively impact the proposed use or future users of the site.

The owners have no knowledge of past on-site contamination on the Subject Lands.

FUTURE AMENDMENTS

To implement any conversion approved by the Region, an Official Plan Amendment (OPA) to the Aurora Official Plan will be required for the Subject Lands to convert the land use from Business Park to Medium-High Density Residential and Mixed Use with exceptions. Refinements of the remaining Business Park designation may also be necessary to realize the vision contemplated for the overall Mixed Use Development. Upon receiving approval of a Regional Official Plan Amendment for conversion, applications will be made to amend the Town's Official Plan to redesignate the lands. In addition, Zoning By-law Amendment and Site Plan applications would be required to facilitate future development, along with a possible Draft Plan of Subdivision application.

SUMMARY AND RECOMMENDATION

The proposal envisioned on the Subject Lands is one that will contribute to an overall Mixed Use Development in the Town of Aurora. This proposal is in line with Provincial Policy and structured around existing community amenities and municipal infrastructure. The proposal contemplates a more favourable, cohesive, live-work environment that will provide healthy sustainable employment uses and innovative jobs. It will further strengthen the community fabric and promote compact, integrated employment areas.

The proposed conversion of employment lands to non-employment purposes meets the intent and purpose of the policies with respect to employment land conversions as outlined in the Growth Plan and the Town's Official Plan and has been demonstrated as follows:

- The conversion will not detract from the Region and Town's population and employment projections, rather achieving this goal through a more compact and higher density form utilizing a more efficient absorption of land area.
- The Subject Lands will result in a net increase of jobs within the overall Mixed Use Development, thereby confirming Subject Lands as being surplus to the Town and Region's employment land needs.
- Based on the employment planned to be generated by the proposal, the Subject Lands are not required over the planned horizon for employment purposes as originally designated.

- The proposed development will exceed the jobs of traditional employment which had been anticipated for this employment area.
- Other sites within the Town designated for employment purposes will ensure that opportunities for traditional employment uses can continue to be accommodated should viable opportunities emerge.
- The Subject Lands are fully serviced containing water, wastewater and stormwater services.
- It is anticipated that transit services will be realigned through or adjacent to the Subject Lands to enhance service to employment uses and the greater mixed use development.
- The proposed conversion preserves lands to the east for strictly employment uses as a part of the overall vision of the Mixed Use Development.

The report demonstrates that the proposal for employment lands conversion at the northwest corner of Highway 404 and Wellington Street East to permit non employment uses is consistent with the Provincial Policy Statement (2014), conforms to the Growth Plan (2017), meets the intent and purpose of the Regional Official Plan and Town of Aurora Official Plan and represents good planning.

We would also like to confirm our consent at this time to be added to the Region's distribution list to be kept apprised of key milestones in the MCR process.

Please feel free to contact us if you have any questions or wish to discuss in further detail.

We would be pleased to meet at your earliest convenience on our request.

Yours truly,

MHBC



David A. McKay, MSc, MLAI, MCIP, RPP
Vice President and Partner



Mariusz Jastrzebski, BURPI, MCIP, RPP
Senior Planner

cc. *Whitwell Developments Limited*
Paul Bottomley and Sandra Malcic, Region of York
Mayor Tom Mrakas and David Waters, Town of Aurora

APPENDIX A

Land Use Concept Plan



Site Statistics

Density Summary in Support of MCR Application - Aurora Lands

Aurora Buisness Park Lands (North West Corner of Highway 404 and Wellington St.)

Area	Ac.	Ha.
	20.59	8.330714

Employment Baseline

Ha	Jobs/Ha	Total Jobs
8.330714	40	333.22856

Mixed-Use Concept

Office Component

Building ID	Floorplate	Height	Total GFA	SF/Job	Total Jobs
1	21,000.00	4	84,000.00	250	336.00
2	21,000.00	4	84,000.00	250	336.00
3	21,000.00	4	84,000.00	250	336.00
4	21,000.00	4	84,000.00	250	336.00
5	21,000.00	4	84,000.00	250	336.00
Total			420,000.00	-	1,680.00

Residential Component

Building ID	Floorplate	Height	Total GFA	Net GFA	SF/Unit	Total Units
1	17,000.00	6	102,000.00	86,700.00	800.00	108
2	20,000.00	6	120,000.00	102,000.00	800.00	128
3	32,000.00	6	192,000.00	163,200.00	800.00	204
4	32,000.00	6	192,000.00	163,200.00	800.00	204
Total			606,000.00	515,100.00	-	644