



**WESTON
CONSULTING**

planning + urban design

Office of the City Clerk
City of Vaughan
2141 Major Mackenzie Dr.
Vaughan, ON L6A 1T1

September 16, 2020
File 3867-1

**Attn: Members of Regional Council
Region of York**

**RE: Region of York Municipal Comprehensive Review
Special Council Meeting - Planning for Employment and Employment Conversions
Vaughan Mills Centre Secondary Plan Lands – Request V10**

Weston Consulting is the planning consultant for H & L Title Inc. / Ledbury Investments Ltd., 2811187 Ontario Limited, and Anland Developments Inc., which comprise the Vaughan Mills Centre Secondary Plan Landowners Group (the “Landowners Group”) who have land holdings located southeast of the intersection of Weston Road and Rutherford Road in the City of Vaughan (herein referred to as the “subject lands”).

We have been actively engaged in the York Region Municipal Comprehensive Review (“MCR”) process on behalf of the Landowners Group. We have reviewed the Staff Recommendations contained in the Memorandum dated September 10, 2020. The purpose of this letter is to reiterate our request that a portion of the subject lands be converted to non-employment uses to allow for mixed-use development, including residential uses.

Previous submissions have been made to Regional Staff on May 1, 2019 and the City of Vaughan on May 20, 2020. An oral deputation was also made to Vaughan City Council on behalf of the Landowners Group on May 20, 2020. We request that Regional Council consider the previous submissions, contained as attachments to this letter in their consideration of this employment conversion request.

The subject lands have been removed from the Provincially Significant Employment Zone (“PSEZ”) by the latest mapping released by the Province. This suggests that the subject lands are not deemed significant on a Provincial level for meeting the Province’s employment needs and achieving forecasted growth targets.

Furthermore, the proposal does not constitute a conversion of the full subject lands in their entirety. Only the western portion of the site abutting Weston Road, comprising a total developable area of 17 hectares (42 acres), is proposed for conversion as part of this redevelopment scheme, which represents less than half of the total site area. The remaining lands (approximately 21 hectares) are to remain for prestige employment uses and a central public open space.

The employment numbers currently contemplated by the Vaughan Mills Centre Secondary Plan are unsupported and unrealistic, and would result in densities that exceed those within the VMC. The proposed concept contemplates more appropriate employment densities which still exceed the regional target for Major Office employment, but which better respect the locational context of the subject lands, consider the availability of services and infrastructure to serve the site, and better complement the function of the VMC as the primary office hub rather than compete with it.

For the reasons outlined above and those provided in our previous submissions and depositions, we request that the employment conversion request V10 be approved and that the subject lands be removed from the Regional employment designation accordingly. Thank you for the opportunity to provide these comments. Please contact the undersigned at extension 240 or extension 241 should you have any questions regarding this submission.

Yours truly,
Weston Consulting
 Per:

Mark N. Emery, BES, MCIP, RPP
 President

and

Ryan Guetter, BES, MCIP, RPP
 Senior Vice President

c. Vaughan Mills Centre Secondary Plan Landowners Group, Client
 Mark Flowers, Davies Howe LLP
 Paul Freeman, Chief Planner, Region of York

Enclosures

ATTACHMENT 1



TESTON RD

MAJOR MACKENZIE DR

WESTON RD

RUTHERFORD RD

HWY 400

BASS PRO MILLS DR

JANE ST

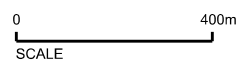


File No: 3867-1
Date Drawn: Jan 31, 2019
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Planner: RG
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LEGEND

- Subject Lands
- - - Block 33

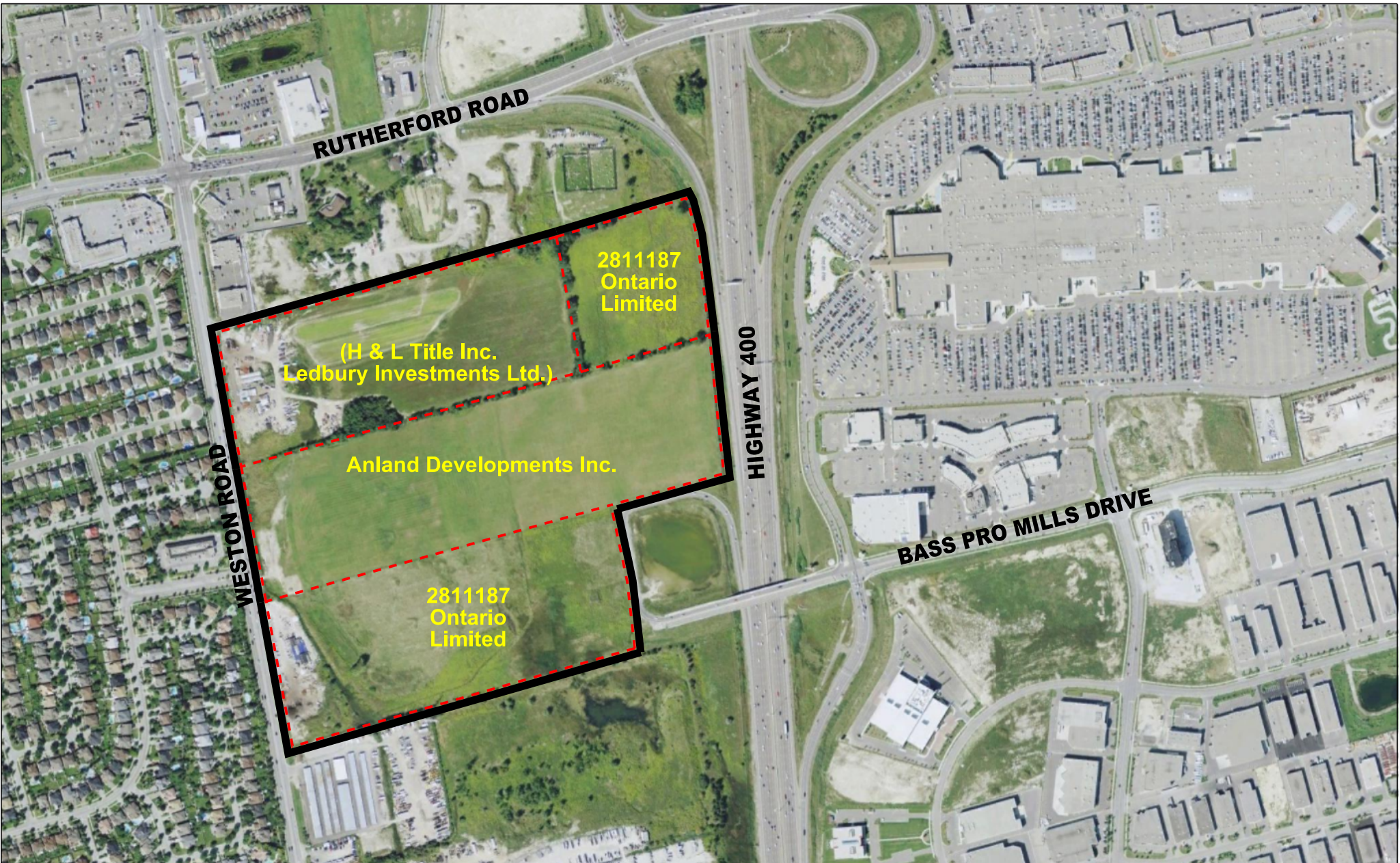


Air Photograph from First Base Solutions Inc. Date of photography: 2018

CONTEXT AIR PHOTO

WESTON ROAD & RUTHERFORD ROAD
CITY OF VAUGHAN
REGIONAL MUNICIPALITY OF YORK

ATTACHMENT 2



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LEGEND

 **LAND OWNERS GROUP**

File Number: 3867
 Date Drawn: 10 JUNE 13
 Drawn By: SM
 Planner: JL
 Scale: NTS
 CAD: 3867/schedules/3867 Ownership map.dgn



Air Photograph from Google Earth Pro.
 Date of photography: August 2009

LAND OWNERSHIP MAP

ATTACHMENT 3

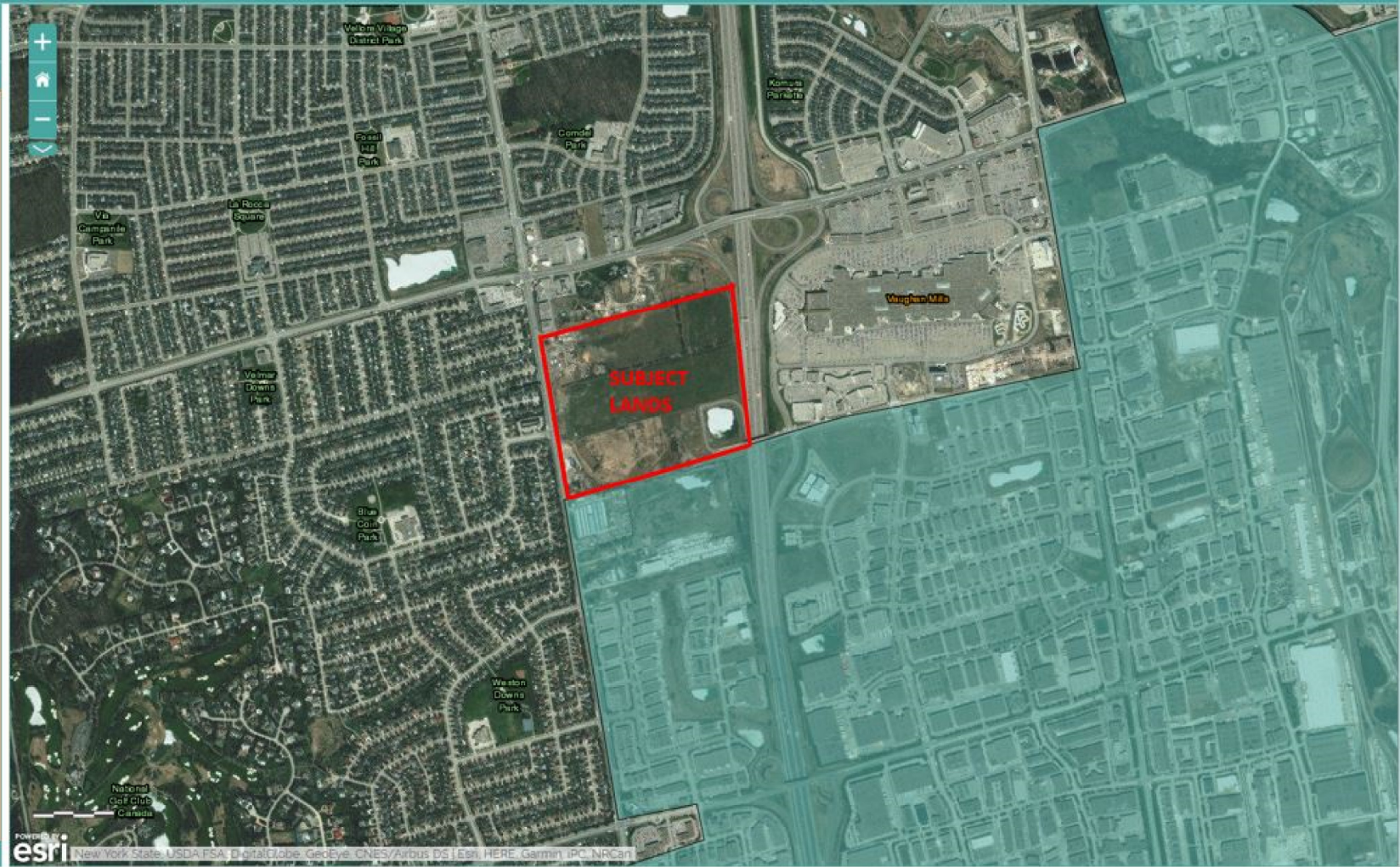
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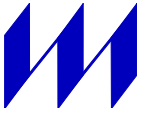
Provincially Significant Employment Zones



Press ALT + 0 to 7 keys for fast navigation



ATTACHMENT 4



WESTON CONSULTING

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Regional Municipality of York
17250 Yonge Street
Newmarket, ON
L3Y 4W5

May 1, 2019
File 3867-1

**Attn: Paul Freeman, Chief Planner
Region of York**

Dear Sir,

**RE: Region of York Municipal Comprehensive Review
Vaughan Mills Centre Secondary Plan Lands**

Weston Consulting is the planning consultant for H & L Title Inc. / Ledbury Investments Ltd., 2811187 Ontario Limited, and Anland Developments Inc., which comprise the Vaughan Mills Centre Secondary Plan Landowners Group (the "Landowners Group") who have land holdings located southeast of the intersection of Weston Road and Rutherford Road in the City of Vaughan (herein referred to as the "subject lands") (Appendix B). We have been engaged to provide assistance to the Landowners Group during York Region's Municipal Comprehensive Review ("MCR") process.

We understand that the Region of York will generate updated population and employment forecasts as part of the MCR process, as required by the Growth Plan for the Greater Golden Horseshoe, 2017 (the "Growth Plan"). These forecasts will then inform initial Housing, Employment and Intensification strategies and land budget allocations in York Region. This letter provides information to be considered by Regional Staff in their assessment of employment lands supply and forecasts for the Region as part of the ongoing MCR process.

Property Description and Surrounding Area

The subject lands are located south of Rutherford Road, west of Highway 400, east of Weston Road, and north of the future extension of Bass Pro Mills Drive (Appendix A). The subject lands have a combined area of approximately 39.20 hectares (96.86 acres). Although the subject lands have been designated for employment uses for several years, they are currently vacant, with the exception of a garden centre. As such, despite being surrounded by a wide range of urban uses (as noted below) and having direct access to major arterial roads and a provincial highway, the subject lands currently contribute minimal employment opportunities to the local, regional and provincial economy.

The following land uses are located adjacent to the subject lands:

North:	A retail commercial plaza, an outdoor paintball course, and an outdoor commercial storage facility;
South:	Industrial/Commercial employment uses and an outdoor commercial storage facility;
East:	Highway 400 and the Vaughan Mills Shopping Centre; and,
West:	Low density residential uses comprised primarily of single-detached dwellings.

Planning Context

On June 26, 2014, York Region Council approved Amendment Number 2 to the City of Vaughan Official Plan (“OPA 2”), the Vaughan Mills Centre Secondary Plan. OPA 2 proposes to designate the subject lands within the so-called “Vaughan Mills Centre Business District” for ‘*Prestige Office Employment*’ and ‘*Prestige Employment*’ uses. The proposed land use pattern will further segregate the subject lands from mixed-use areas proposed for the east side of Highway 400 and south of Rutherford Road. As a result, our clients appealed OPA 2 to the Ontario Municipal Board (since continued as the Local Planning Appeal Tribunal (“LPAT”)), pursuant to s. 17(36) of the *Planning Act*. The Landowners Group also appealed portions of the City of Vaughan Official Plan (“VOP 2010”), which was adopted by City of Vaughan Council on September 7, 2010.

Both VOP 2010 and OPA 2 were adopted at a time when the 2006 version of the Growth Plan for the Greater Golden Horseshoe applied. The LPAT had scheduled a first phase hearing of the Landowners Group appeals of VOP 2010 and OPA 2 to commence on April 1, 2019 (LPAT Case Nos. PL140839 and PL111184). However, on consent of the Landowners Group, the City of Vaughan, and the Region of York, the LPAT recently adjourned the April 2019 hearing and has rescheduled the hearing of the appeals to begin in May 2020. The parties requested the adjournment of the LPAT hearing, in part given the anticipated amendments to the Growth Plan, and also to allow the parties sufficient time to pursue settlement discussions.

In light of the pending LPAT hearing, the appropriate official plan designation on the subject lands will be determined by LPAT. However, in order to ensure that the Region is fully aware of our client’s proposed uses on the subject property, we are making this submission so that the Region can take this proposal into consideration as it carries out its Municipal Comprehensive Review.

Proposed Development Concept

Our clients have prepared a concept plan for the subject lands that proposes a mix of land uses comprised of residential, open space, commercial, and employment uses. The concept plan proposes the following:

- The realignment of Black Creek to create a greenway channel and public open space block at the centre of the development;
- Low-rise residential uses fronting on the east side of Weston Road to provide a transition between the existing residential neighbourhood west of Weston Road and the balance of the development on the subject lands;
- High-rise mixed uses located on the west side of the proposed greenway channel;
- Mid-rise residential uses located in the interior of the block between the low-rise residential uses and high-rise mixed uses;
- High-density Prestige Employment Uses located adjacent to the east side of the greenway channel and adjacent to Highway 400;
- High-density Prestige Office Employment Uses located at the intersection of two proposed collector streets and north of the existing stormwater management pond; and,
- Retail/Service uses located along a proposed collector road that connects to Rutherford Road.

The concept plan proposes that employment uses on the subject lands are confined to the east side of the proposed greenway channel, closest to Highway 400 and appropriately separated from the low-density residential community west of Weston Road. The concept plan further proposes the intensification of employment uses on the east side of the subject lands to provide for a significant amount of employment on the subject lands. On the west side of the subject lands, an appropriate mix of housing types is proposed for all incomes, including affordable housing.

Proposed Provincially Significant Employment Zone

Weston Consulting understands that the Ministry of Municipal Affairs and Housing proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe 2017 on January 15, 2019. We further understand that the proposed amendment aims to protect certain employment lands, while reducing barriers to unlocking land for residential and non-residential development in a timely manner. The proposed amendment designates the subject lands as within a Provincially Significant Employment Zone. Policy 2.2.5.12 of the proposed amendment to the Growth Plan states the following:

12. The Minister may identify provincially significant employment zones to support co-ordination of planning for jobs and economic development at a regional scale and will require their protection through appropriate official plan polices and designations. Policy 2.2.5.10 will not apply to any part of an employment area within a provincially significant employment zone.

Based on the above, Weston Consulting submitted a formal request to the Ministry on February 28, 2019 on behalf of the Landowners Group requesting the subject lands be excluded from the proposed Provincially Significant Employment Zone (Appendix C).

Planning Analysis

The Region is undertaking a review of the Regional Official Plan policies as part of the MCR process, including the employment policies. Staff are currently undertaking an analysis of the Region's employment land needs to 2041 and the need to identify and protect employment lands for the long term.

Based on our review of the surrounding area and the context of the subject lands, it is our opinion that the subject lands are not suitable for employment use in their entirety. The proposed mixed-use development concept is similar to an established and proven pattern of land use along the Highway 400 corridor. In particular, this land use pattern is demonstrated by Block 33, located to the north of the subject lands (Attachment A). Block 33 is composed of employment lands on the east side of the block along Highway 400 and primarily residential land uses on the west side of the block.

The proposed development concept for the subject lands provides appropriate transitions between surrounding low-rise residential uses to the west and mixed uses to the north and east. Intensifying employment uses on the east side of the subject lands adjacent to Highway 400 will assist in achieving Regional objectives for employment intensification in this area and will contribute to meeting employment density targets. Further, the provision of additional housing in an existing built-up area is supportive of Provincial, Regional and local objectives to provide for a range and mix of housing types, including the provision of affordable housing.

In our view, it is appropriate that enhanced retail commercial and residential permissions be provided for the subject lands, allowing for an appropriate transition to the established residential area to the west of Weston Road and the provision of a range of housing options within the VMSCP area, while also providing a significant amount of diverse employment uses in the same precinct. The redevelopment of the subject lands with a mix of uses in compact densities will allow for more efficient use of currently underutilized land parcels while achieving employment densities that are appropriate for the location and context of the lands.

Next Steps

As noted above, the scheduled LPAT hearing will determine how the subject property will be developed. Our clients welcome any opportunity to discuss the concept plan with the Region and City. We trust that the Region will consider the proposed concept for the subject property as part of the ongoing MCR process in its assessment of long-term employment lands supply and forecasts.

We kindly request to be notified of any future reports and/or meetings regarding the Regional Municipal Comprehensive Review and request to be notified of any decisions regarding this matter. We intend to monitor the York Region Official Plan Review process on an ongoing basis.

Thank you for the opportunity to provide these comments. Please contact the undersigned at extension 240 or extension 241 should you have any questions regarding this submission.

Yours truly,
Weston Consulting

Per:


Mark N. Emery, BES, MCIP, RPP
President

and


Ryan Guetter, BES, MCIP, RPP
Senior Vice President

c. Client

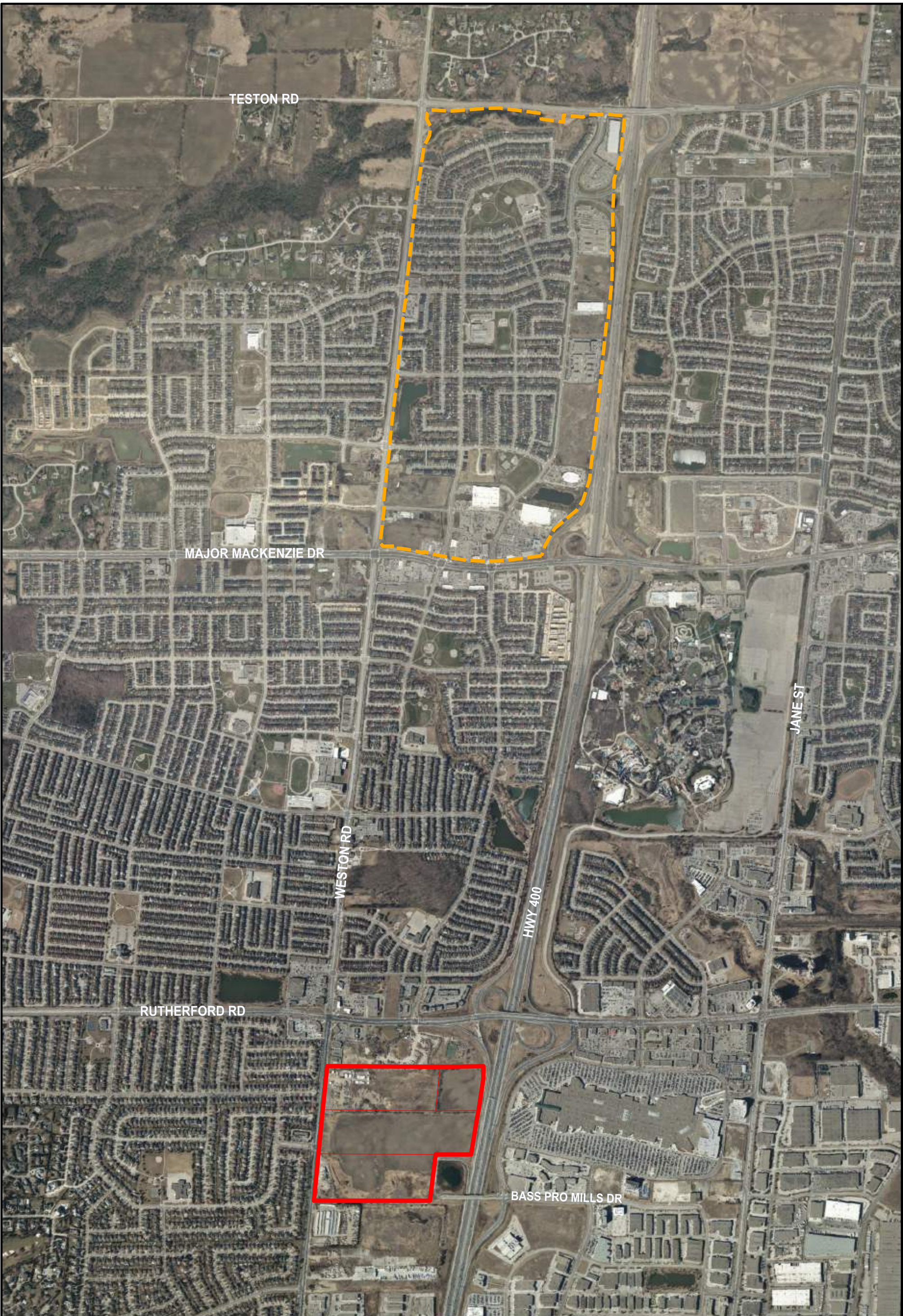
Paul Bottomley, York Region, Manager Policy, Research and Forecasting

Sandra Malcic, York Region, Director, Long Range Planning

Jason Schmidt-Shoukri, City of Vaughan, Deputy City Manager

Attachments:

- A. Context Air Photo
- B. Landowners Map
- C. Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe (2017) Letter Submission, dated February 28, 2019



TESTON RD

MAJOR MACKENZIE DR

WESTON RD

RUTHERFORD RD

HWY 400

JANE ST

BASS PRO MILLS DR

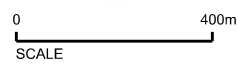


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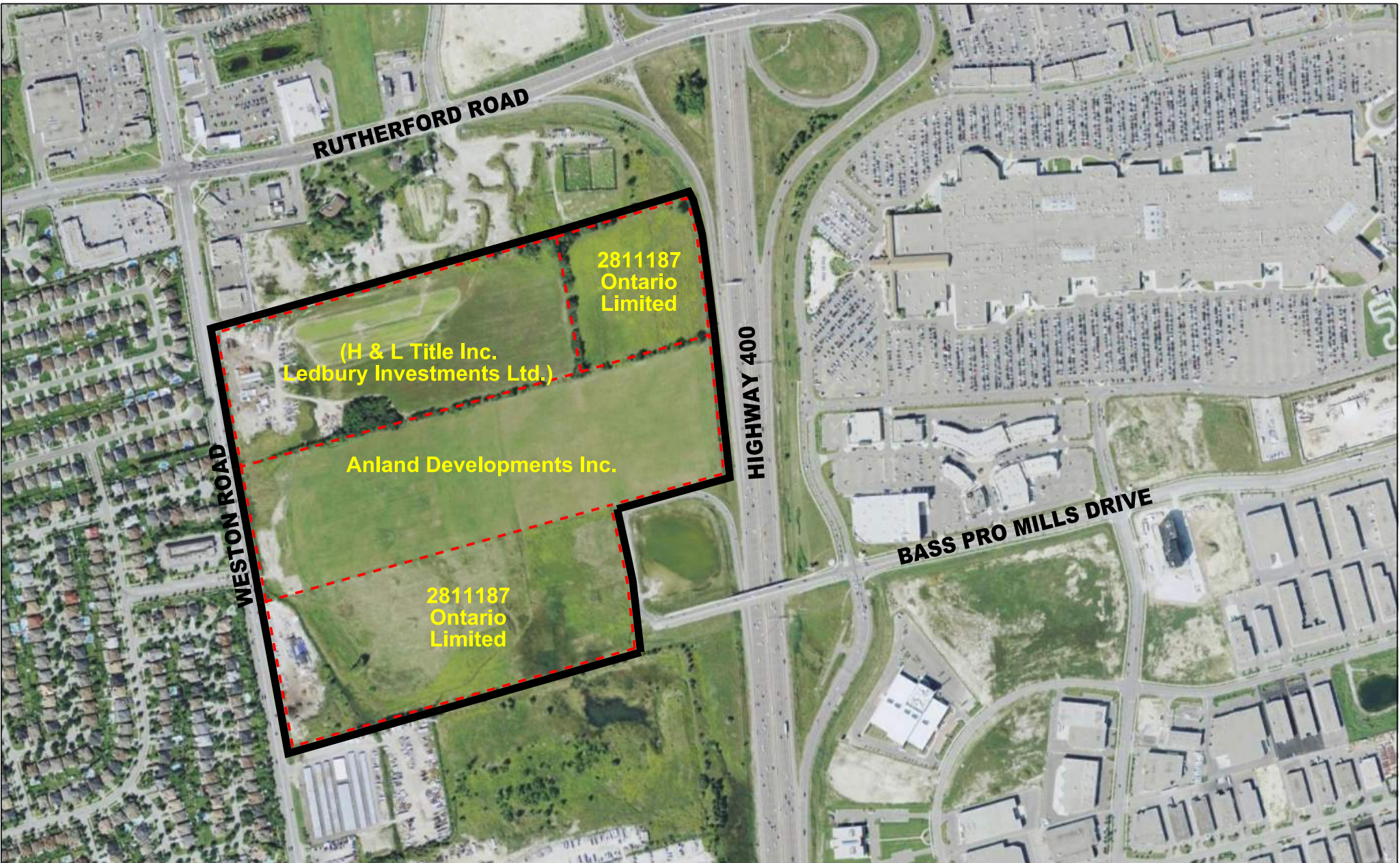
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- - - Block 33



Air Photograph from First Base Solutions Inc. Date of photography: 2018

CONTEXT AIR PHOTO

WESTON ROAD & RUTHERFORD ROAD
CITY OF VAUGHAN
REGIONAL MUNICIPALITY OF YORK



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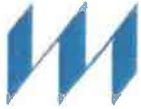
 LAND OWNERS GROUP

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Air Photograph from Google Earth Pro.
Date of photography: August 2009

LAND OWNERSHIP MAP



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Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

February 28, 2019
File 3867-1

**Attn: Hon. Steve Clark,
Minister of Municipal Affairs and Housing**

Dear Sir,

**RE: Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe
(2017)
Proposed Provincially Significant Employment Zone
Vaughan Mills Centre Secondary Plan Lands**

Weston Consulting is the planning consultant for H & L Title Inc. / Ledbury Investments Ltd., 2811187 Ontario Limited, and Anland Developments Inc., which comprise the Vaughan Mills Centre Secondary Plan Landowners Group (the "Landowners Group") who have land holdings located southeast of the intersection of Weston Road and Rutherford Road in the City of Vaughan (herein referred to as "the subject lands"). Weston Consulting has reviewed the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe (2017) (the "Growth Plan"), including the proposed provincially significant employment zone mapping.

This letter requests that the subject lands be excluded from the proposed provincially significant employment zone and also responds to your request for feedback as to whether there are any specific planning matters in process that should be addressed through proposed amendments to the transition regulation (O. Reg. 311/06).

Background

The subject lands are located south of Rutherford Road, west of Highway 400, east of Weston Road, and north of the future extension of Bass Pro Mills Drive (Appendix A). The subject lands have a combined area of approximately 39.20 hectares (96.86 acres). Although the subject lands have been designated for employment uses for several years, the subject lands are currently vacant, with the exception of a garden centre. As such, despite being surrounded by a wide range of urban uses (as noted below) and having direct access to major arterial roads and a provincial highway, the subject lands currently contribute minimal employment to the local, regional and provincial economy.

The following land uses are located adjacent to the subject lands:

North:	A retail commercial plaza, an outdoor paintball course, and an outdoor commercial storage facility;
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On June 26, 2014, York Region Council approved Amendment Number 2 to the City of Vaughan Official Plan (OPA 2), the Vaughan Mills Centre Secondary Plan (VMCSP). OPA 2 proposes to designate the subject lands within the so-called "Vaughan Mills Centre Business District" for *Prestige Office Employment* and *Prestige Employment* uses. The proposed land use pattern will further segregate the subject lands from mixed use areas proposed for the east side of Highway 400 and south of Rutherford Road. As a result, our clients appealed OPA 2 to the Ontario Municipal Board (since continued as the Local Planning Appeal Tribunal ("LPAT")), pursuant to s. 17(36) of the *Planning Act*. The Landowners Group also appealed portions of the City of Vaughan Official Plan ("VOP 2010"), which was adopted by City of Vaughan Council on September 7, 2010.

Both VOP 2010 and OPA 2 were adopted at a time when the 2006 version of the Growth Plan for the Greater Golden Horseshoe applied. The LPAT had scheduled a first phase hearing of the Landowners Group appeals of VOP 2010 and OPA 2 to commence on April 1, 2019 (LPAT Case Nos. PL140839 and PL111184). However, on consent of the Landowners Group, the City of Vaughan, and the Region of York, the LPAT recently adjourned the April 2019 hearing and has rescheduled the hearing of the appeals to begin in May 2020. The parties requested the adjournment of the LPAT hearing, in part given the anticipated amendments to the Growth Plan, and also to allow the parties sufficient time to pursue settlement discussions. Accordingly, it would be appropriate to address this proceeding through the proposed amendments to the transition regulation.

Proposed Development Concept

Our clients have prepared a concept plan for the subject lands that proposes a mix of land uses comprised of residential, open space, commercial, and employment uses. The concept plan proposes the following:

- The realignment of Black Creek to create a greenway channel and public open space block at the centre of the development;
- Low-rise residential uses fronting on the east side of Weston Road to provide a transition between the existing residential neighbourhood west of Weston Road and the balance of the development on the subject lands;
- Mid-rise mixed uses located in the interior of the block between the low-rise residential uses and the high-rise mixed uses;

- High-rise mixed uses located on the west side of the proposed greenway channel;
- High density Business Employment Uses located adjacent to the east side of the greenway channel and adjacent to Highway 400;
- High density Prestige Office Employment Uses located at the intersection of two proposed collector streets and north of the existing stormwater management pond; and,
- Retail/Service uses located along a proposed collector road that connects to Rutherford Road.

The concept plan proposes that employment uses on the subject lands are confined to the east side of the proposed greenway channel, closest to Highway 400 and appropriately separated from the low-density residential community west of Weston Road. The concept plan further proposes the intensification of employment uses on the east side of the subject lands to provide for a significant amount of employment on the subject lands. On the west side of the subject lands, an appropriate mix of housing types is proposed for all incomes, including affordable housing.

Proposed Provincially Significant Employment Zone

Weston Consulting understands that the Ministry of Municipal Affairs and Housing proposed Amendment 1 to the Growth Plan on January 15, 2019. We further understand that the proposed amendment aims to protect certain employment lands, while reducing barriers to unlocking land for residential and non-residential development in a timely manner. The proposed amendment to the Growth Plan provides for the conversion of lands within an existing employment area to a designation that permits non-employment uses before the next Municipal Comprehensive Review, as outlined in proposed Policy 2.2.5.10 below:

- 10. Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the conversion would:*
- a. satisfy the requirements of policy 2.2.5.9 a), d) and e); and*
 - b. maintain a significant number of jobs on those lands.*

However, the proposed amendment to the Growth Plan designates the subject lands within a provincially significant employment zone (Appendix B). Policy 2.2.5.12 of the proposed amendment to the Growth Plan states the following:

- 12. The Minister may identify provincially significant employment zones to support co-ordination of planning for jobs and economic development at a regional scale and will require their protection through appropriate official plan policies and designations. Policy 2.2.5.10 will not apply to any part of an employment area within a provincially significant employment zone.*

Based on the proposed policies above, we request that the subject lands be excluded from the proposed provincially significant employment zone.

Planning Rationale

Based on our review of the surrounding area, it is our opinion that the subject lands are not suitable for employment use in their entirety. The proposed mixed-use development concept is similar to an established and proven pattern of land use along the Highway 400 corridor. In particular, this land use pattern is demonstrated by Block 33, located north of the subject lands (Appendix A). Block 33 is composed of employment lands on the east side of the block along Highway 400 and primarily residential land uses on the west side of the block.

The proposed development concept for the subject lands provides appropriate transitions between surrounding low-rise residential uses to the west and mixed uses to the north and east. Intensifying employment uses on the east side of the subject lands adjacent to Highway 400 will assist in achieving Regional objectives for employment intensification in this area and will contribute to meeting employment density targets. Further, the provision of additional housing in an existing built-up area is supportive of Provincial, Regional, and City objectives to provide for a range and mix of housing types, including the provision of affordable housing.

The exclusion of the subject lands from the proposed provincially significant employment zone would be consistent with the mixed-use development of the subject lands as proposed. Meetings have been held with senior officials at York Region and the City of Vaughan to present and review the proposed development concept. Given that this planning area is currently under appeal, it would be appropriate to exclude the subject lands from the proposed provincially significant employment zone and allow settlement discussions and/or LPAT mediation to proceed as intended by the parties.

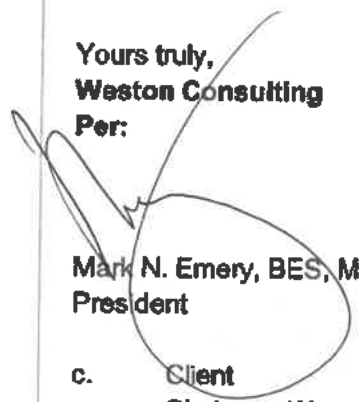
Next Steps

At this time, we respectfully request on behalf of our clients, who are the above referenced landowners, that the subject lands be excluded from the provincially significant employment zone and that the outstanding appeals of the VOP 2010 and OPA 2, dating from 2010 and 2014, respectively, be appropriately addressed through the proposed amendments to the transition regulation.

Additionally, although we will be monitoring the proposed amendment process, we kindly request to be notified to the extent parties who have provided comments are updated regarding the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe (2017).

Thank you for the opportunity to provide these comments. Please contact the undersigned at extension 240 or extension 241 should you have any questions regarding this submission.

**Yours truly,
Weston Consulting
Per:**



**Mark N. Emery, BES, MCIP, RPP
President**

and

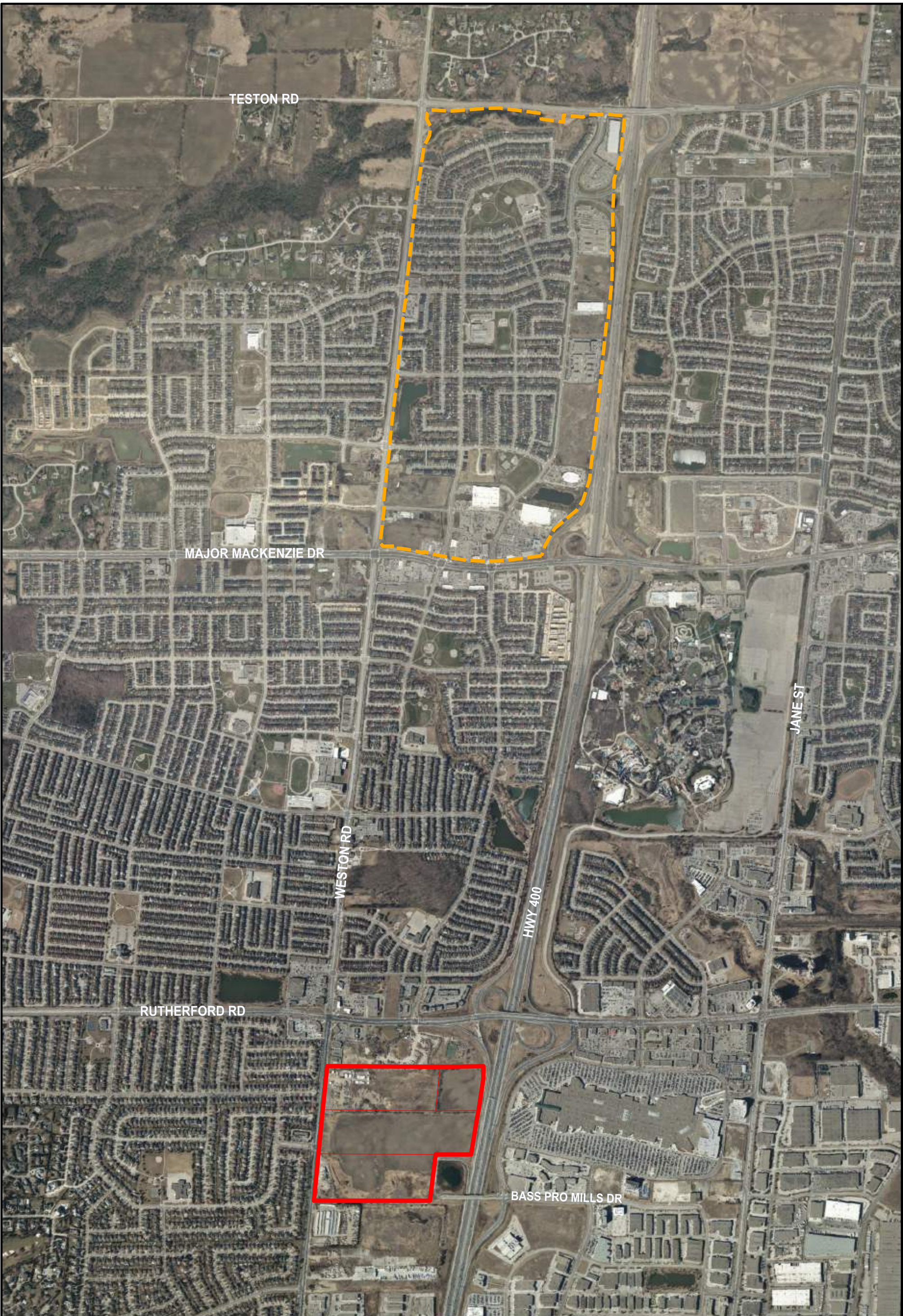


**Ryan Guetter, BES, MCIP, RPP
Senior Vice President**

c. Client

- Chairman Wayne Emmerson, York Region**
- Paul Freeman, York Region, Chief Planner**
- Paul Bottomley, York Region, Manager Policy, Research and Forecasting**
- Mayor Maurizio Bevilacqua, City of Vaughan**
- Jason Schmidt-Shoukri, City of Vaughan, Deputy City Manager**

Attachment: Landowners map

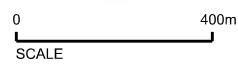


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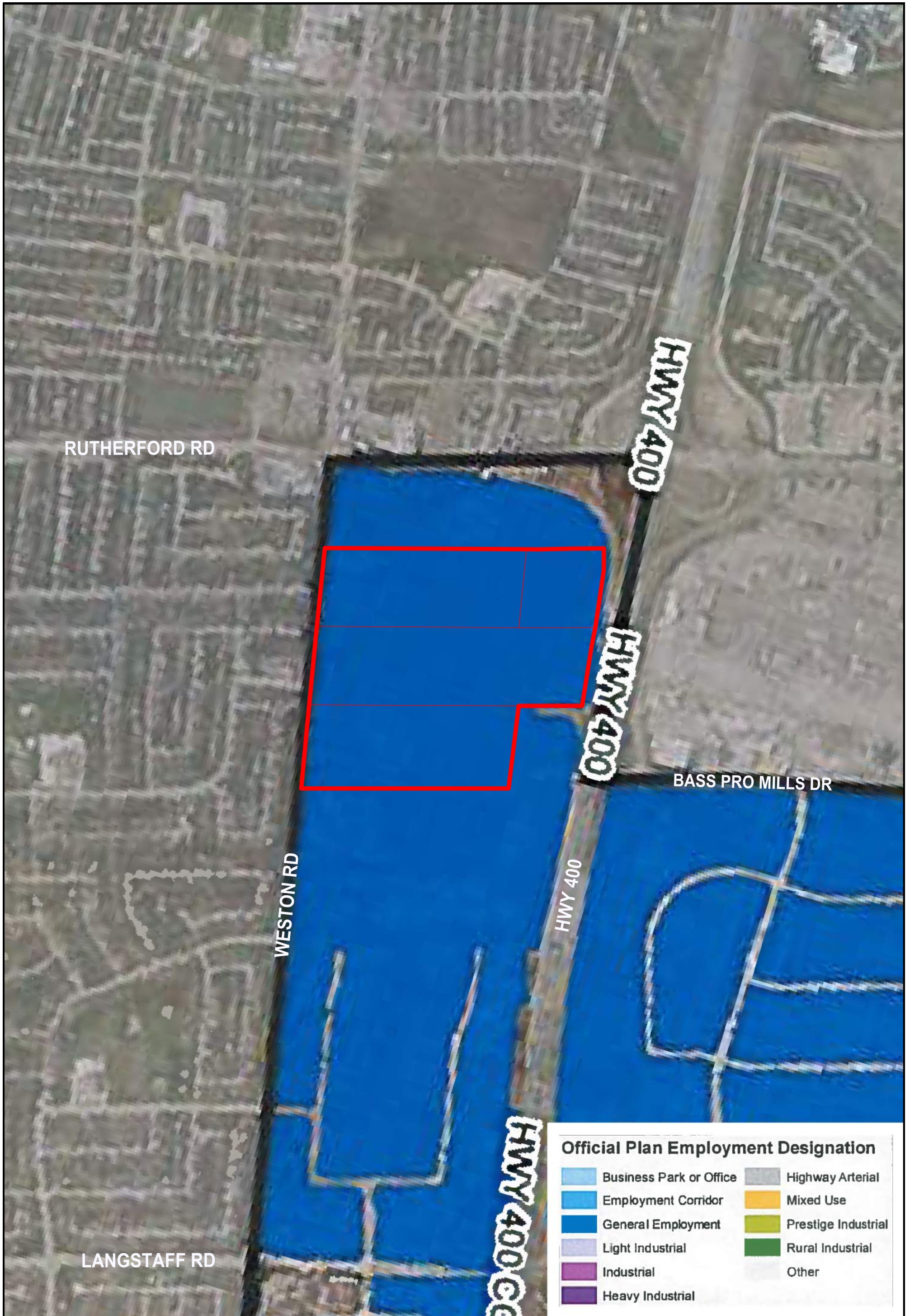
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Air Photograph from First Base Solutions Inc. Date of photography: 2018

CONTEXT AIR PHOTO

WESTON ROAD & RUTHERFORD ROAD
 CITY OF VAUGHAN
 REGIONAL MUNICIPALITY OF YORK



RUTHERFORD RD

HWY 400

HWY 400

BASS PRO MILLS DR












WESTON RD

HWY 400

HWY 400


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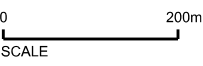
Official Plan Employment Designation

 Business Park or Office	 Highway Arterial
 Employment Corridor	 Mixed Use
 General Employment	 Prestige Industrial
 Light Industrial	 Rural Industrial
 Industrial	 Other
 Heavy Industrial	



LEGEND

 Subject Lands



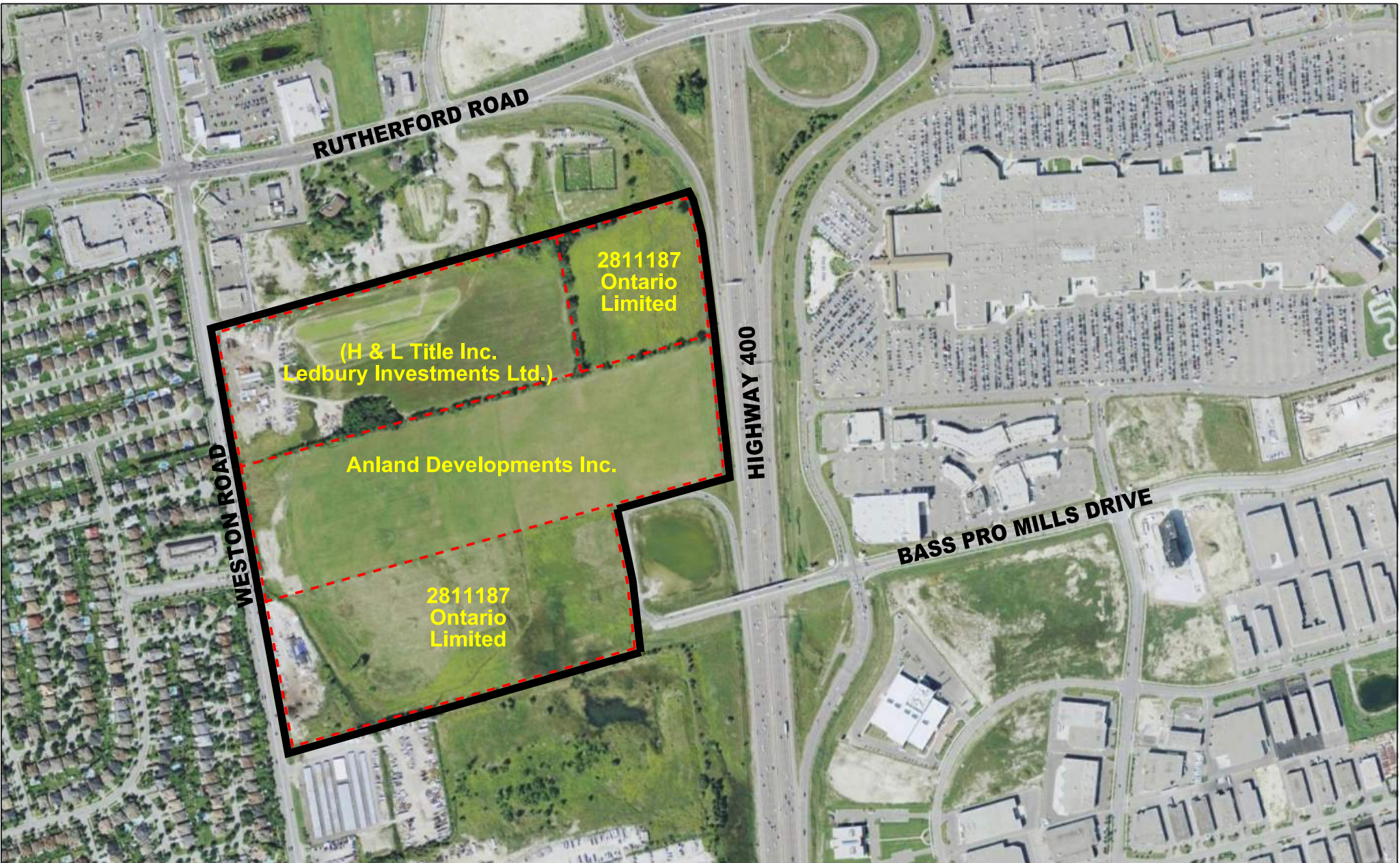
Proposed Provincially Significant Employment Zones
Vaughan North, Area Number 7, 2018

**Proposed Provincially Significant Employment Zones
Vaughan North, Area Number 7**

WESTON ROAD & RUTHERFORD ROAD
CITY OF VAUGHAN
REGIONAL MUNICIPALITY OF YORK

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LEGEND

 LAND OWNERS GROUP

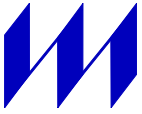
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Air Photograph from Google Earth Pro.
Date of photography: August 2009

LAND OWNERSHIP MAP

ATTACHMENT 5



WESTON CONSULTING

planning + urban design

“WITHOUT PREJUDICE”

Office of the City Clerk
City of Vaughan
2141 Major Mackenzie Dr.
Vaughan, ON L6A 1T1

May 19, 2020
File 3867-1

Attn: Mayor Bevilacqua and Members of City Council

**RE: Region of York Municipal Comprehensive Review
Planning for Employment and Employment Conversions
Vaughan Mills Centre Secondary Plan Lands**

Weston Consulting is the planning consultant for H & L Title Inc. / Ledbury Investments Ltd., 2811187 Ontario Limited, and Anland Developments Inc., which comprise the Vaughan Mills Centre Secondary Plan Landowners Group (the “Landowners Group”) who have land holdings located southeast of the intersection of Weston Road and Rutherford Road in the City of Vaughan (herein referred to as the “subject lands”).

We have been actively engaged in the York Region Municipal Comprehensive Review (“MCR”) process on behalf of the Landowners Group. We have reviewed the Staff Report, dated May 20, 2020, and associated attachments (Committee of the Whole Item 10) as they relate to City Staff’s recommendation on the subject lands and the active employment conversion request. The purpose of this letter is to reiterate and clarify our request that a portion of the subject lands be converted to non-employment uses to allow for mixed-use development, including residential uses. This letter also seeks a deferral of the consideration of the proposed conversion request in order to host a public open house with the community, which has been delayed as a result of the current circumstances surrounding the global COVID-19 pandemic.

Property Description and Background

The subject lands are located south of Rutherford Road, west of Highway 400, east of Weston Road, and north of the future extension of Bass Pro Mills Drive. The subject lands have a combined area of approximately 39.20 hectares (96.86 acres).

Although the subject lands have been designated for employment uses for several years, they are currently vacant, with the exception of a garden centre. As such, despite being surrounded by a wide range of urban uses including commercial retail, commercial employment and low-rise residential uses, and having direct access to major arterial roads and a provincial highway, the subject lands currently contribute minimal employment opportunities to the local, regional and Provincial economy.

The subject lands have been removed from the Provincially Significant Employment Zone (“PSEZ”) by the latest mapping released by the Province in December, 2019. This suggests that the subject lands are not deemed significant on a Provincial level for meeting the Province’s employment needs and achieving forecasted growth targets.

Bass Pro Mills Drive Extension Municipal Class EA

A Municipal Class Environmental Assessment (“Class EA”) for the extension of Bass Pro Mills Drive west of Highway 400 to Weston Road commenced on March 5, 2020. The Class EA will define the problems and opportunities, evaluate solutions and designs and determined a preferred design for the propose transportation improvements. The proposed development concept for the subject lands considers this extension as part of an improved road network.

The extension of Bass Pro Mills Drive will reduce congestion on Weston Road and provide alternate, direct access to Highway 400 and the nearby Vaughan Mills Shopping Centre for the residents of Woodbridge. In addition, the proposed development plan provides for a full internal road network to facilitate complete transportation ingress, egress, and circulation within the development block.

Community Consultation

The Landowners Group would like to work closely with the community to address feedback and concerns as they relate to the proposed development concept. Based on discussions with City Staff and the local Councillor, it is the intent of the Landowners Group to host a public open house with the community in order to seek feedback and address concerns from the public. However, given the current circumstances surrounding the global COVID-19 pandemic, it has not been possible to arrange for and host an open house event in advance of Council’s consideration of Staff’s employment conversion recommendations. As such, we are requesting a deferral of the consideration of the conversion request for the subject lands in order to allow for the hosting of a public open house and to provide time to address the concerns of the community.

Local Planning Appeal Tribunal Appeal

On June 26, 2014, York Region Council approved Amendment No. 2 to the City of Vaughan Official Plan (“OPA 2”), the Vaughan Mills Centre Secondary Plan (“VMCSP”). OPA 2 proposes to designate the subject lands within the “Vaughan Mills Centre Business District” for Prestige Office Employment and Prestige Employment uses. The proposed land use pattern will further segregate the subject lands from mixed-use areas proposed for the east side of Highway 400 and south of Rutherford Road. As a result, the Landowners Group appealed OPA 2 to the Ontario Municipal Board (continued as the Local Planning Appeal Tribunal (“LPAT”)), pursuant to s. 17(36) of the Planning Act. The Landowners Group also appealed portions of the City of Vaughan Official Plan (“VOP 2010”), which was adopted by City Council on September 7, 2010.

Both VOP 2010 and OPA 2 were adopted at a time when the 2006 version of the Growth Plan for the Greater Golden Horseshoe applied. The LPAT had scheduled a first phase hearing of the Landowners Group appeals of VOP 2010 and OPA 2 (Case Nos. PL140839 and PL111184); however, on consent of the Landowners Group, the City of Vaughan and York Region, the LPAT adjourned the originally scheduled hearing. The parties requested the adjournment, in part, given the anticipated amendments to the Growth Plan and to allow the parties sufficient time to pursue settlement discussions.

Description of Proposed Development Concept

The proposed development concept for the subject lands envisions a mixed-use development consisting of low to high-rise residential uses on the west side of the lands, higher-order office employment and commercial uses on the east side, and open space uses. A public open space ("Greenway Public Open Space") containing a portion of the Black Creek extends through the centre of the subject lands, separating the proposed residential and employment uses from one another. The residential uses are proposed to have building heights ranging from 4-storeys in the northwest corner, 6-storeys for the proposed buildings fronting onto Weston Road, 5 to 18-storeys in the interior of the west side, and 8-storeys for the proposed buildings abutting the proposed Greenway Public Open Space. The proposed office employment uses will have building heights ranging from 2 to 8-storeys. Two 9-storey hotels and 1- to 2-storey retail buildings are also proposed on the east side of the subject lands.

The concept plan proposes that employment uses on the subject lands are situated on the east side of the proposed greenway channel, closest to Highway 400 and are appropriately separated from the low-density residential community west of Weston Road. Approximately 21 hectares (51.9 acres) of the site are proposed to remain within the employment designation, which includes 5 hectares (12.4 acres) of public open space associated within the realigned Black Creek. The intensification of employment uses on the east side of the subject lands will provide for a significant amount of employment on these currently vacant lands.

On the west side of the subject lands, an appropriate mix and variety of housing types are proposed for all incomes to support the principle of creating a complete community. Approximately 17 developable hectares (42 acres) are proposed for conversion to non-employment uses to facilitate the proposed residential intensification. This represents less than half of the total site being proposed for conversion. To clarify, the proposed employment conversion does not apply to the full 39 hectares.

Employment Densities

The VMCSPP contemplates a total of 7,590 jobs for the 'Vaughan Mills Centre Business District', which includes the entirety of the subject lands as well as the lands to the north fronting Rutherford Road (the "Rutherford Lands"). IBI Group has determined that approximately 512 jobs can be appropriately accommodated on the Rutherford Lands, which would leave 7,078 jobs to be accommodated on the subject lands based on original forecasts. In our opinion, the City has failed to adequately justify the employment numbers contemplated by the VMCSPP, and these projections

remain unsubstantiated and unsupported on the subject lands given their physical and market context.

The proposed employment, retail / service, and potential hotel uses on the subject lands will yield approximately 5,033 jobs on site. This employment target will be met through both the commercial space contained within the mixed-use area of the plan and through the higher density employment uses fronting Highway 400. Approximately 4,700 of these jobs will be created from the higher-order office employment uses along the Highway 400 corridor. The total employment density will therefore comprise over 300 jobs per hectare across the entire site. This employment yield will complement the density target of 200 jobs and persons per hectare set for the Vaughan Metropolitan Centre ("VMC"), which is emphasized as an office priority area, and functions as the City's Urban Growth Centre. In our opinion, this represents a level of potential employment that will not compete with the VMC, compared with the original employment targets prescribed by York Region of over 7,000 jobs.

In addition to those identified in the VMCSPP, Regional job density targets have been established for York Region. The target density for employment uses including Major Office is 54 jobs per net hectare. Based on the area of the subject lands, approximately 1,700 jobs would need to be accommodated on the site to meet Regional employment land density targets. The proposed employment densities exceed the Region's target by 3,333 jobs and represents over 2 times the planned target. As a result, although the proposed concept does not provide the ongoing anticipated number of jobs identified by the VMCSPP as described above, the proposal does provide an appropriate employment density for the subject lands given their location and context that well exceeds the number of jobs anticipated or planned by the Region.

Furthermore, the densities proposed by the concept are more respectful of the context applicable to the subject lands and recognize a complimentary relationship with the VMC. Without the necessary infrastructure, including higher order transit facilities such as a subway line, the development of the subject lands with the VMCSPP target of 7,000 jobs would serve to compete with the function of the VMC in an area that does not have the appropriate services to support it. Achieving an employment density as proposed by the VMCSPP would, in our opinion, threaten the viability of the VMC as a major employment centre and would not be sustainable on the subject lands given its contextual location and lack of higher order transit services. The proposed employment density exceeds the 200 jobs and persons per hectare densities targeted for the VMC. As a result, the proposed concept will serve to better complement the City's Urban Growth Centre, rather than compete with it, particularly in emphasizing the VMC as an office priority area.

In consideration of the recent global circumstances surrounding the COVID-19 pandemic, it is anticipated that employment-related development patterns will be permanently altered. Given the recent shift to physical distancing and working from home, traditional compact office buildings based on floor space rate of 75 square feet per employee will no longer be the standard work space. Increased opportunities for work from home employment have been contemplated by the development proposal.

Complete Community & Housing Affordability

The compact, mixed-use development concept incorporates a mix of residential, commercial, open space, and employment uses, providing a place where residents can live, work, and play close to home. The proposed built form incorporates a range of densities and appropriately transitions from employment in the east to residential in the west. It is designed to maintain compatibility with the adjacent low-rise, established residential neighbourhood to the west of the site. As well, the residential uses on the west side will step down in height and density towards Weston Road, respecting the adjacent neighbourhood.

Furthermore, the proposed concept allows for the provision of alternative forms of housing in terms of built form, tenure and affordability. A greater range of housing styles and affordability will be accommodated on the subject lands through the proposed apartment-style built form, compared to the previously proposed forms. This supports the Provincial, Regional and local objectives for the creation of complete communities and the reduction in the number of required automobile trips.

Conclusions

Based on the foregoing, we submit that the proposed employment conversion for the subject lands is appropriate and reflects the overall objectives of the City, Region and Province. However, given the circumstances around the global COVID-19 pandemic, it is necessary to defer City Council's consideration of this request. We respectfully request that:

- Consideration of the employment conversion request for the subject lands by City Council be deferred until a public consultation meeting can be held with stakeholders in order to address feedback and concerns related to the proposed development concept.
- The proposal does not constitute a conversion of the full subject lands in their entirety. Only the western portion of the site abutting Weston Road, comprising a total developable area of 17 hectares (42 acres), is proposed for conversion as part of this redevelopment scheme, which represents less than half of the total site area. The remaining lands (approximately 21 hectares) are to remain for prestige employment uses and a central public open space.
- The employment numbers currently contemplated by the VM CSP are unsupported and unrealistic, and would result in densities that exceed those within the VMC. The proposed concept contemplates more appropriate employment densities which still exceed the regional target for Major Office employment, but which better respect the locational context of the subject lands, consider the availability of services and infrastructure to serve the site, and better complement the function of the VMC as the primary office hub rather than compete with it.
- The proposed concept would allow for the creation of a complete mixed-use community which would provide opportunities for living and working within close proximity. A range

and mix of alternative housing forms will be accommodated, while also maintaining significant employment densities in order to meet Regional and Provincial targets.

- In the context of the proposed development concept, the proposed conversion request should be properly presented and discussed with the neighbouring community, and in our view, represents good planning and should ultimately be supported.

Thank you for the opportunity to provide these comments. Please contact the undersigned at extension 240 or extension 241 should you have any questions regarding this submission.

Yours truly,

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Per:



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