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VIA EMAIL

The Regional Municipality of York
York Region Administrative Centre
17250 Yonge Street
Newmarket, ON L3Y 6Z1

Attention: Regional Clerk

Dear Sirs/Mesdames:

RE: Draft York Region Official Plan 2022

We are the lawyers for Lorwood Holdings Incorporated, VMS Holdings Inc., and Ms. Vittoria Guglietti (together, "**Lorwood**"), owners of the properties at 11860 Pine Valley Drive, 12000 Pine Valley Drive, 12100 Pine Valley Drive, and 4581 King Vaughan Road in the of Vaughan (together, the "**Lands**"). We are writing in advance of consideration of the draft York Region Official Plan 2022 (the "**YROP 2022**") by Regional Council, which we understand is anticipated for June 16, 2022.

Inclusion of the Lands within the Urban Area and Designated Greenfield Area

We have had an opportunity to review the proposed mapping and policies of the draft YROP 2022. We understand that a portion of the Lands are proposed to be included within the *Urban Area* of the Region of York, as shown on proposed Map 1. Lorwood supports the inclusion of the Lands within the *Urban Area* designation.

The Lands are also proposed to be within a *Designated Greenfield Area* designation on proposed Map 1B.

Lorwood agrees that the Lands are appropriate for inclusion within the *Designated Greenfield Area*, as they are advantageously located in the City of Vaughan and a portion or all of them may be developed as part of the urban fabric of the community within the horizon of the Official Plan.

Employment Area Designation and Minimum Densities

In addition, a portion of the Lands are, for the first time, proposed to be designated *Employment Area* on proposed Map 1A and subject to the relevant Employment Area policies of the draft YROP 2022. That portion of the Lands are further identified as being part of the proposed

Highway 400 North Employment Area in Appendix 1. The *Highway 400 North* Employment Area has a minimum density target of 55 jobs/ha in the draft YROP 2022.

We note that lands to the north, northeast, and southeast of the Lands, while also proposed to be added to the *Urban Area* of the Regional Official Plan, have not been included in the *Employment Area* designation or in the *Highway 400 North* Employment Area specifically. Rather, these lands in the vicinity are proposed to have a *Community Area* designation, which would provide for a wide range of permitted uses, including opportunities for residential and mixed-use intensification.

The portion of the City of Vaughan in which the Lands are situated is currently being studied as part of the potential Highway 413 corridor. The identification of the Lands (or a portion of them) as being suitable for employment uses, as opposed to other forms of residential and mixed-use intensification, is dependent in large measure on whether the Highway 413 corridor is realized and the timing for the implementation of the same. In our view, other land use permissions for the Lands, such as those found within the *Community Areas* designation, would be more appropriate for the Lands in the event that the Highway 413 corridor is not realized or if the proposed route is altered in the vicinity of the Lands. This appears to have been the approach to lands to the north, northeast, and southeast of the Lands which are proposed to be brought into the *Urban Area* under the draft YROP 2022. Although we agree that certain employment uses may potentially be developed on the Lands, in our view a more flexible designation of the lands that also permits residential and mixed-use intensification would be appropriate.

Agricultural and Greenlands System

Other portions of the Lands are proposed to have *Agricultural* and *Regional Greenlands System* designations on various proposed maps of the draft YROP 2022. In Lorwood’s submission, such mapping and such designations should not propose or implement any changes beyond similar current designations under the in-force Regional Official Plan, the City of Vaughan Official Plan, or in Provincial policies and plans (e.g. the Greenbelt Plan). To that end, Lorwood objects to any such revisions that are inconsistent with currently in-force agricultural and greenlands policies.

Request for Notice

Please provide us with written Notice of the Region’s decision in this matter, as well as notice of any further consideration of the YROP 2022 by the Region or any Regional committee. Our address for notice is provided herein.

Yours truly,
Overland LLP



Per: Christopher J. Tanzola
Partner