

**From:** Rosemarie Humphries [mailto:rhumphries@humphriesplanning.com]

**Sent:** Wednesday, March 06, 2019 7:26 PM

**To:** Regional Clerk

**Cc:** Adam Grossi

**Subject:** Comment Letter - Proposed Employment Area Conversion Criteria - March 7 Committee of the Whole Item H.2.3

Please find attached correspondence in relation to CofW item H.2.3 on behalf of the Highway 400 North Landowners Group.

**Rosemarie L. Humphries BA, MCIP, RPP  
President**

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March 6, 2019  
HPGI File # 0449

**SUBMITTED VIA EMAIL:** regional.clerk@york.ca

The Regional Municipality of York  
York Region Administrative Centre  
17250 Yonge Street, 1<sup>st</sup> Floor  
Newmarket, ON L3Y 6Z1

**Attn: Wayne Emmerson, York Region Chairman and CEO**

**Re: Comment Letter – Proposed Employment Area Conversion Criteria  
Vaughan 400 North Landowners Group Inc.  
Blocks 34W and 35, City of Vaughan  
Lots 26 through 35, Vaughan Conc. 5 & Lot 1, King Conc. 5**

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Dear Mr. Emmerson,

Humphries Planning Group Inc. represents the Vaughan 400 North Landowners Group, made up of the owners of lands within Blocks 34W and 35, in the City of Vaughan (the “subject lands”) (Refer to Figure 1).

The Vaughan 400 North Landowners Group area was brought into the Urban Area of the City of Vaughan and designated as employment lands by Region Official Plan Amendment No. 52 (“ROPA 52”), approved by order of the Ontario Municipal Board, dated August 19, 2010. The lands were further designated for employment uses by City of Vaughan Official Plan Amendment 637, approved by order of the Ontario Municipal Board, dated November 21, 2011.

A formal request for a land use conversion for the subject lands to permit residential uses was submitted to the Region on July 25, 2018 (attached hereto). This request is noted as Request 21, on Attachment 3 to the Proposed Employment Area Conversion Criteria staff report. Following our review of this report, we wish to provide the following comments for Regional Council’s consideration.

FIGURE 1 – LOCATION MAP



Section 4 of the report addresses conversion requests in employment areas that have yet to develop, and states that conversion requests in certain recently planned employment areas not be considered, including the ROPA 52 lands, identified in the report as Highway 400 North. It is further stated that the conversion of these lands would be premature as they have not had the opportunity to develop, due to pending servicing, or as a result of being recently brought into the urban boundary. Regional staff considers preservation of these areas a requirement, in order to accommodate future employment growth to 2031 and therefore recommends that the submitted conversion requests be evaluated through a subsequent MCR. This opinion is reflected in the Proposed Employment Area Conversion Criteria (Attachment 4 of the Staff Report), which states:

**“York Region Criteria**

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).”*

We disagree with this opinion, and the proposed conversion criteria on the basis of the following:

- ROPA 52 and City of Vaughan Official Plan Amendment No. 637 were approved by Orders of the Ontario Municipal Board on August 19, 2010 and November 21, 2011 respectively. In the more than seven years since the approval of these documents, both the Region of York and the City of Vaughan have had considerable time to

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contemplate how the development of the subject lands could occur and how these lands fit into the Region’s overall strategy for employment lands;

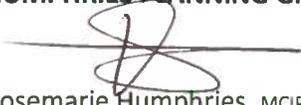
- Notwithstanding the comments provided by the Region to the Province of Ontario with respect to the establishment of Provincially Significant Employment Lands; the Province, as part of the proposed Amendment 1 to the Growth Plan, has not identified the subject lands as being Provincially Significant Employment Lands. This is consistent with the OMB decision for ROPA 52, wherein the Board identified the subject lands as being significant at only the Regional and Municipal levels. Given this, and based on the proposed Amendment 1 to the Growth Plan, it is reasonable to consider that the subject lands would be a candidate for a conversion outside of the Municipal Comprehensive Review (“MCR”) process; and,
- Both the in-force Growth Plan and the proposed Amendment 1 to the Growth Plan provide criteria to assess conversion requests. It is our opinion that this criterion is sufficient to evaluate the appropriateness of the submitted conversion request and as such, there is no reason to defer consideration of the request to a subsequent MCR.

**Based on the above, we would request that the submitted conversion request be considered as part of the Region’s ongoing MCR, and that the Proposed Employment Area Conversion Criteria be amended to exclude the Highway 400 North (ROPA) 52 lands.**

Thank you for your consideration of the requests provided herein. Should you require anything further, please do not hesitate to contact the undersigned.

Yours truly,

**HUMPHRIES PLANNING GROUP INC.**

  
Rosemarie Humphries, MCIP, RPP  
President

cc: Vaughan 400 North Landowners Group Inc.  
Mr. Michael Melling, Davies Howe LLP