

SENT VIA EMAIL - regionalclerk@york.ca

File: P-2160

May 18, 2022

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

Attention: Chris Raynor, Regional Clerk

**Re: Draft Regional Official Plan Consultation Update and Statutory Public Meeting
Committee of the Whole, Thursday May 19, 2022
Agenda Item F.2.1
Block 66 West Landowners Group Inc. (the "Landowners")
City of Vaughan (the "City")
Regional Municipality of York (the "Region")**

KLM Planning Partners Inc. is the land-use planning consultant acting on behalf of the Landowners, who collectively own approximately 153.8 hectares (380 acres) located within Block 66 West in the City (the "**Subject Lands**", see **Attachment 1**). Block 66 West is approximately 182.9 hectares (451.9 acres) in size; thus, our clients own approximately 84% of the Block.

On December 1, 2021, the Region released a draft Regional Official Plan for public comment (the "**Draft OP**"). KLM provided comments on behalf of the Landowners on March 31, 2022 respecting the proposed employment area lands framework and the proposed density target of 30 jobs/hectare for the West Vaughan Employment Zone. This letter has been appended to this letter for ease of reference. Following an extensive consultation process, an updated Draft Regional Official Plan – Track Changes Version May 2022 (the "**Updated OP**") was released on May 13, 2022. Changes proposed within the Updated OP correspond with the modifications as identified in Attachment 1 to the staff report noted above.

Our March 31, 2022 letter has been identified/summarized by staff in Attachment 1 noted above, however we note that our comments do not appear to have resulted in any policy modifications in the Updated OP.

It continues to be our position that the modifications proposed in our previous letter are appropriate and that there remains sufficient time prior to Council's anticipated adoption of the Updated OP in June, 2022 to affect change to the Updated OP in this regard.

We would appreciate the opportunity to participate in discussions related to this process and may wish to make further detailed submissions to Regional Council. Finally, as noted in our previous submissions we respectfully request notice of any future reports and/or public meetings and consultations regarding the draft Regional Official Plan, and that we receive notice of any decision of Regional Council and ultimately the Minister of Municipal Affairs and Housing.

Yours very truly,
KLM PLANNING PARTNERS INC.

A handwritten signature in blue ink, appearing to read 'RML', with a stylized flourish at the end.

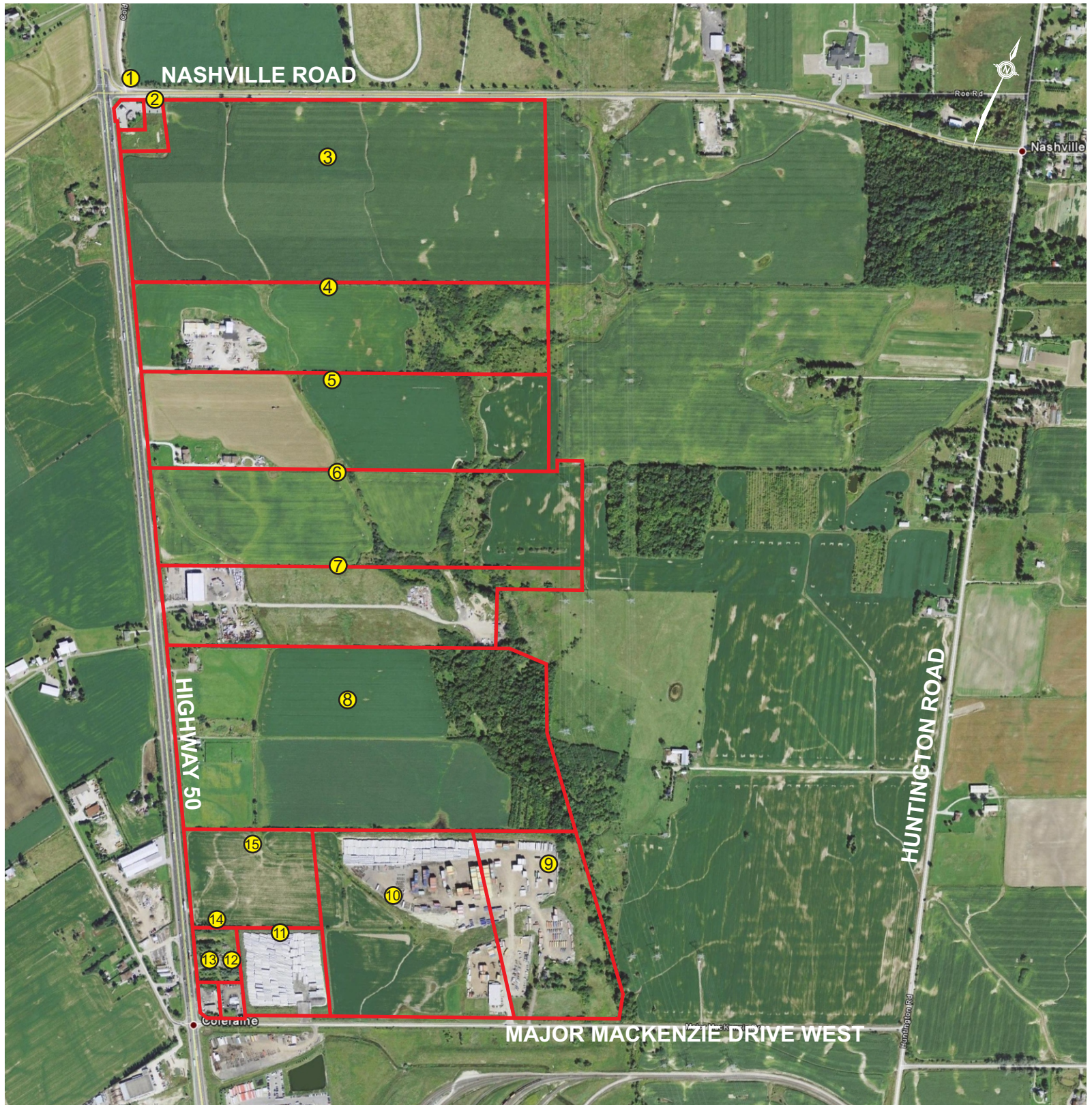
Ryan Mino-Leahan, MCIP, RPP
Partner

A handwritten signature in blue ink, appearing to read 'T. Schilling', with a stylized flourish at the end.

Tim Schilling, MCIP, RPP
Senior Planner

cc: Client

BLOCK 66 WEST VAUGHAN



SUBJECT LANDS

N.T.S.
May 18, 2022

SENT VIA EMAIL - futureyork@york.ca

P-2160

March 31, 2022

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

Attention: Draft Region Official Plan

RE: **Comments on the December 1, 2021 Draft York Region Official Plan
Block 66 West Landowners Group Inc. (the "Landowners")
City of Vaughan (the "City")
Regional Municipality of York (the "Region")**

KLM Planning Partners Inc. is the land-use planning consultant acting on behalf of the Landowners, who collectively own approximately 153.8 hectares (380 acres) located within Block 66 West in the City (the "**Subject Lands**", see **Attachment 1**). Block 66 West is approximately 182.9 hectares (451.9 acres) in size; thus, our clients own approximately 84% of the Block.

On December 1, 2021, the Region released a draft Regional Official Plan (the "**Draft OP**") for public comment. We understand that comments are requested by March 31, 2022, with a statutory public open house and statutory public meeting scheduled for May 2022.

We have completed a review of the Draft OP on behalf of the Landowners, and provide the following comments:

1. Section 4.3.21 of the Draft OP proposes density targets for each proposed Regional employment zone, as required by *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*. The Subject Lands are located within the proposed 'West Vaughan' employment zone *per* Appendix 1 to the Draft OP, with a proposed density target of 30 jobs/hectare of developable area.

The *Planning for Employment Background Report, 2019*, prepared in support of the Region's Municipal Comprehensive Review (the "**Employment Report**"), identifies that largely due to location and the sector makeup of employment areas, densities vary across the Region.

In West Vaughan, where there are a large number of warehouse and distribution facilities, densities are as low as 5 - 10 jobs/hectare. The *Employment Report* further notes that although the trend Region-wide is towards more mixed-use development and higher overall employment area densities, there has been an increase in land-intensive warehouses in West Vaughan. This has increased the desirability of large, serviced, freight-supportive vacant parcels of land in greenfield

areas. New warehouse facilities in West Vaughan include distribution centres for Costco and Fed Ex, with an average employment density of 22 jobs/hectare or 1,500 square feet *per* employee.

Based on this context, we recommend that the Region should reduce the proposed density target of 30 jobs/hectare for the West Vaughan Employment Zone to better align with current and potential employment densities realized in West Vaughan, with perhaps a slight increase, to 25 jobs/hectare.

2. Section 4.3.12 of the Draft OP introduces a framework for the Regional Employment Area consisting of 'Core Employment Areas' and 'Supporting Employment Areas', to be mapped in local municipal Official Plans. The majority of a municipality's employment areas are required to be identified as Core Employment Areas, with Supporting Employment Areas generally to be limited to the periphery of employment areas adjacent to arterial roads.

Core Employment Areas and Supporting Employment Areas are proposed to be defined as follows:

Core Employment Area - Employment areas and/or portions of employment areas to be designated in local official plans that generally are:

- i. Within employment areas adjacent to, or in proximity to 400-series highways
- ii. Adjacent to, or in proximity to, existing or planned employment uses that are incompatible with non-employment uses. Examples include noxious uses and/or traditional and/or land extensive employment uses such as manufacturing, warehousing and logistics
- iii. Not appropriate for more flexible employment uses

Supporting Employment Area - Employment areas and/or portions of employment areas to be designated in local official plans that are on the periphery of employment areas and/or may be candidates for mixed employment uses because of their location within existing or proposed intensification areas. This generally includes employment areas that:

- a. are adjacent to major Regional arterial roads or on the fringe of employment areas;
- b. have significant portions of commercial, retail, and/or other service or knowledge-based uses;
- c. are directly abutting or in close proximity to residential or other sensitive uses and could benefit from more appropriate buffering from existing or future employment uses that may be incompatible.

Examples include noxious uses, clusters of manufacturing or other traditional employment uses.

Our concern with the proposed employment area framework is that the distinction between the Core Employment Areas and Supporting Employment Areas is not clear in terms of identifying where noxious uses and traditional and land-extensive employment uses such as manufacturing, warehousing and logistics can go.

The proposed definition of Core Employment Areas identifies, amongst other locational criteria, that they are adjacent or in proximity to existing or planned employment uses that are incompatible with non-employment uses (e.g., manufacturing).

The proposed definition of Supporting Employment Areas identifies, amongst other locational criteria, that they are on the periphery of employment areas and directly abut or are in close proximity to residential or other sensitive uses which benefit from buffering from existing or future employment uses.

Both definitions appear to preclude the establishment of noxious uses and/or traditional and/or land-extensive employment uses such as manufacturing, warehousing and logistics.

We recommend that the Region's employment area framework generally reflect that of the West Vaughan Employment Area Secondary Plan, in which employment land use designations are categorized as either "General" or "Prestige".

The General Employment designation is intended to accommodate uses such as industrial, manufacturing and warehousing that, due to their need for outside storage and their possibility of producing noise, odour or other emissions, are not compatible with other uses and therefore cannot be accommodated within other designations.

The Prestige Employment designation is intended to accommodate light industrial, manufacturing and warehousing uses that do not produce noxious emissions and that do not require outside storage. This designation often acts as an interface and buffer between other, more sensitive, community areas and the uses in a General Employment area.

This approach appropriately accommodates noxious, traditional and/or land-extensive employment uses such as manufacturing, warehousing and logistics.

3. We are in the process of completing our review of the proposed natural heritage policies with the assistance of an environmental consultant, however this review is still ongoing. As such we may wish to make further comments related to the above at a future date. We will provide any comments in this regard to the Region as soon as possible.

We would appreciate the opportunity to participate in discussions related to the Draft OP, and may wish to make further detailed submissions.

Finally, we respectfully request notice of any future reports and/or public meetings and consultations regarding the Draft OP, and that we receive notice of any decision of Regional Council.

Yours very truly,
KLM PLANNING PARTNERS INC.



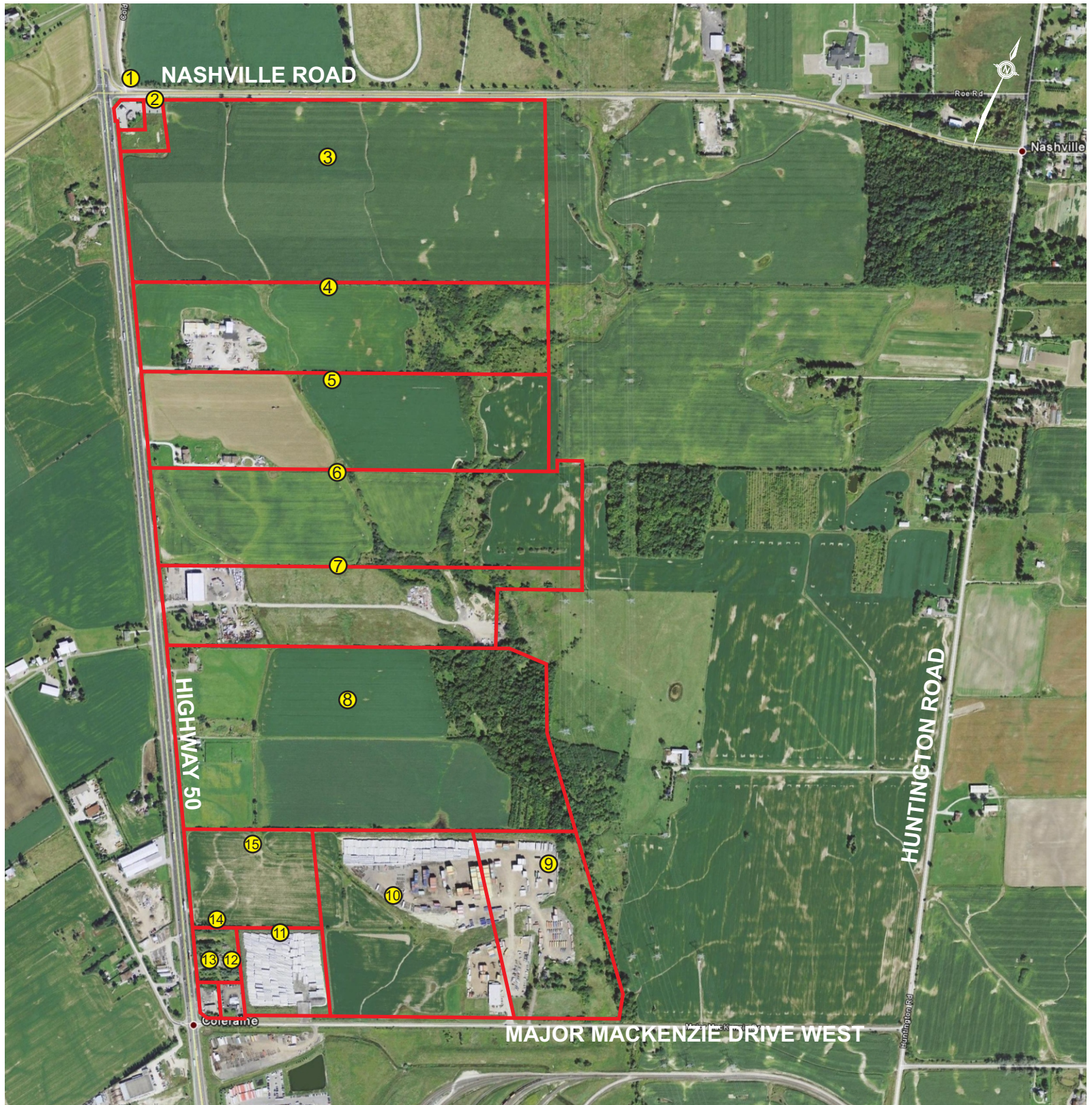
Ryan Mino-Leahan, MCIP, RPP
Partner



Tim Schilling, MCIP, RPP
Senior Planner

cc: Client

BLOCK 66 WEST VAUGHAN



SUBJECT LANDS

N.T.S.
May 6, 2019