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COMMUNICATION
CW (2) – June 21, 2022
Item 20

Barristers & Solicitors
Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, Ontario M5H 2S7
Telephone: 416.979.2211
Facsimile: 416.979.1234
goodmans.ca

Direct Line: (416) 597-5168
jhoffman@goodmans.ca

June 20, 2022

Our File No.: 171939

Via Email

Committee of the Whole
Vaughan City Hall, 2nd Floor
2141 Major Mackenzie Drive
Vaughan, Ontario

Attention: City Clerk

Dear Sirs/Mesdames:

Re: Item 6.20 – Promenade Centre Secondary Plan

We are counsel to Promenade Limited Partnership (“**PLP**”), the owner of the lands municipally known as 1 and 180 Promenade Circle in the Thornhill Vaughan Community (the “**Promenade Lands**”). We write on behalf of our client to provide comments on the draft Promenade Centre Secondary Plan (the “**Draft Secondary Plan**”) that is before the Committee.

As outlined further below, our client is generally supportive of the overall direction of the Draft Secondary Plan, as it supports the intensification of the Promenade Lands. However, our client has a number of concerns with the Draft Secondary Plan in its current form. Two key concerns for PLP and the requested modifications to address these concerns are outlined below. These relate to references in the Draft Secondary Plan to the number of people, jobs and units to be accommodated, and the location of public parks. We kindly request that the Committee direct staff to incorporate these modifications to the Draft Secondary Plan.

Background

As you are aware, PLP owns approximately 51 acres of land within the Promenade Centre Secondary Plan Study (the “**Study**”) area, representing the vast majority of the lands subject to the Draft Secondary Plan. Given the extent of its land holdings, our client and its consultant team have engaged with City staff with respect to the Promenade Lands for many years and participated actively in the Study process since it commenced in Q3 2019.

In January 2020, as input into the Study, PLP formally presented its Master Plan for the Promenade Lands to the City and its consultants. The Master Plan illustrated a phased development, comprising approximately 7,900 residential units, 170 hotel rooms, 95,230 square metres of retail uses and 43,795 square metres of office uses. The Master Plan demonstrated that the Promenade Lands could accommodate significant intensification, while providing substantial contributions to public realm and advancing a number of other policy objectives.

Following submission of the Master Plan, our client and its consultants engaged extensively with City staff and other stakeholders with respect to the content of the proposed secondary plan, in order to ensure that it properly reflected provincial and regional policy direction. This engagement included many submissions to staff and this Committee. In addition, our client has been in touch regularly with City staff through the processing of the Study. Our client appreciates City staff's engagement throughout the Study process.

Requested Modifications

Our client supports the overall direction of the Draft Secondary Plan that is before the Committee, which clearly encourages intensification of the Promenade Lands. However, there remain certain aspects of the Secondary Plan that give rise to concerns and require modification.

Planned People, Jobs and Residential Units

One of the key areas of our client's concerns as conveyed to staff in the course of its discussions throughout the Study was the number of people and jobs planned to be accommodated on the lands subject to the Secondary Plan. The draft materials presented at the November 2021 public meeting provided that approximately 17,235 to 21,162 persons and jobs could be accommodated in the Secondary Plan at ultimate build-out. This equated to approximately 10,700 residential units, which could be developed as new units, as shown on concept plans submitted by landowners within the Draft Secondary Plan area.

In contrast, the Draft Secondary Plan that is now before the Committee references a lower amount of people, jobs and units – namely, 15,500 people, 2,300 jobs and approximately 8,100 residential units. This revision reflected in the Draft Secondary Plan was made without justification and, in our view, it is unfounded. The reference to 8,100 residential units is particularly troubling. There are already 1,610 units existing on the lands today, that were built decades ago. Accordingly, the Draft Secondary Plan would seem to contemplate only approximately 6,490 new units. This represents a significant underutilization of lands that are well-suited to accommodating intensification to help meet the City's need for new housing and more diverse housing options. The Master Plan and supporting materials submitted to the City demonstrate that the Promenade Lands can comfortably accommodate more than 8,100 new units from a planning, urban design and infrastructure perspective.

We request that the Draft Secondary Plan be modified to remove any reference to an approximate unit count, as the number of units will result from the height and density permissions which are included elsewhere in the Draft Secondary Plan. Further, the number of planned people and jobs referenced in section 5.0 of the Draft Secondary Plan should be 21,162 as referenced in City staff's November 2021 materials. The Draft Secondary Plan should also include language to recognize that the planned number of people and jobs is general in nature, is not intended to be a maximum at ultimate build out, and that a greater number of people and jobs may be accommodated where justified through individual development applications.

The Bathurst Street Park

Schedules C and D of the Draft Secondary Plan show a small parkette located just west of the northwestern portion of the existing shopping centre, on the south side of the new east-west road in

that area (the “**Northwest Parkette**”). The Northwest Parkette is too small to be functional and inappropriately constrains development opportunities on the southern portion of that block. Removing the Northwest Parkette and increasing the size of the park shown along Bathurst Street would significantly improve the overall public realm within the Secondary Plan area. A larger public park along Bathurst Street presents enhanced opportunities for park programming in a prominent location, providing an important amenity to both the planned community within the Secondary Plan area and the existing community east of Bathurst Street.

Accordingly, we ask that both Schedules C and D of the Draft Secondary Plan be revised to extend the High-Rise Mixed-Use land use designation northward to replace the Park land use designation shown for the area of the Northwest Parkette, and correspondingly increase the size of the designated Park on PLP lands along Bathurst Street.

Other Refinements

In addition to the matters outlined above, there are other aspects of the Draft Secondary Plan that require refinement. Based on our discussions with City staff to date, our client is hopeful that it will be able to work through these matters prior to Council adoption of the Draft Secondary Plan through continued collaboration with staff.

Conclusion

Our client appreciates the opportunity to provide input throughout the Study process and City staff’s continued engagement on the content of the Draft Secondary Plan. While PLP is generally supportive of the overall thrust of the Secondary Plan, we urge the Committee to modify the Draft Secondary Plan in the manner requested above. We would also appreciate the opportunity to work with staff on other matters requiring refinement before the Draft Secondary Plan proceeds to Council for adoption.

We will be available at the Committee meeting, along with representatives of PLP, to answer any questions.

Yours very truly,

Goodmans LLP



Joe Hoffman
JBH/MXL

cc. Michael Uster and Jim Baird, PLP