

Development Planning, City of Vaughan
2141 Major MacKenzie Drive West,
Vaughan, ON L6A 1T1

September 29, 2023
File 9592-1

Attn: Fausto Filipetto, Project Manager

**Re: City of Vaughan Official Plan Review
7733 Keele Street, Vaughan**

Dear Mr. Filipetto,

Weston Consulting is the planning consultant for 2763108 Ontario Ltd., the registered owner of the property municipally addressed as 7733 Keele Street in the City of Vaughan (herein referred to as the 'Subject Property'). Weston Consulting has been engaged to assist the owner in participating in the City's Official Plan Review (OPR) process. The purpose of this letter is to provide site-specific comments on the Draft Part A Official Plan Amendment (OPA) and Schedules dated September 2023.

Description of Subject Property

The Subject Property is located on the southeast corner of the Highway 7 and Keele Street intersection and is currently occupied by a commercial building complex utilized for a limousine rental service, home furnishings, and design and printing services, along a surface level parking lot. The Subject Property has an approximate lot area of 0.59 hectares (1.46 acres) with an approximate frontage of 46.27 metres along Highway 7 and 103.74 metres along Keele Street.

The site is located within the Keele Bus Rapid Transit Station Major Transit Station Area (MTSA) and is adjacent to the Keele Street Viva Bus Rapid Transit (BRT) stop. The MTSA is planned for higher intensities and diversities of uses to support the existing higher-order transit infrastructure along Highway 7.

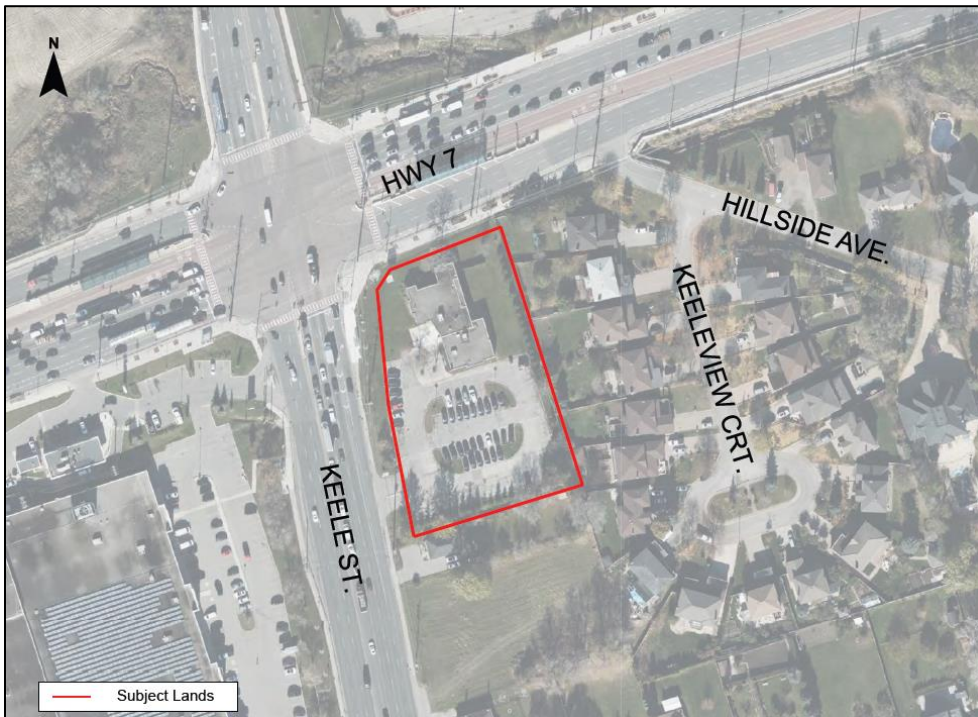


Figure 1 – Air Photo of Subject Property

Policy Context

The Subject Property is designated within the *Urban Area* and is identified within the *Regional Corridor* per Map 1 (Regional Structure) of the provincially-approved York Region Official Plan 2022 (YROP 2022). Per the Policy 4.4.35 of the YROP 2022, *Regional Corridors* “...along transit routes function as urban mainstreets that have a compact, mixed-use, well-designed, pedestrian-friendly and transit-supportive built form and allow for active transportation.” Per Map 1A (Land Use Designations) of the YROP 2022, the Subject Property is designated within the *Community Area*, which permits residential and retail uses. Map 1B (Urban System Overlays) identifies the Subject Property within a Protected MTSA; Appendix 2 (York Region MTSA) specifically identifies the site within the Keele BRT MTSA, which prescribes a minimum density target of 160 persons and jobs per hectare for new development in the area.

The Subject Property is designated as *Regional Intensification Corridor within Employment Areas* and *Employment Commercial Mixed-Use* per Schedule 1 (Urban Structure) and Schedule 13 (Land Use Designations) of the in-force City of Vaughan Official Plan 2010 (VOP 2010), respectively. The areas described are intended for non-residential, employment intensification that will efficiently utilize existing or planned rapid transit infrastructure.

The City of Vaughan Zoning By-law 1-88 and the Comprehensive Zoning By-law 001-2021 zone the Subject Property as *Restricted Commercial (C1)* and *Employment Commercial Mixed-Use Zone (EMU)*, respectively. Residential uses are not permitted in either zone.



Figure 2 – Map 1A (Land Use Designations), York Region Official Plan 2022



Figure 3 – Map 1B (Urban System Overlays), York Region Official Plan 2022

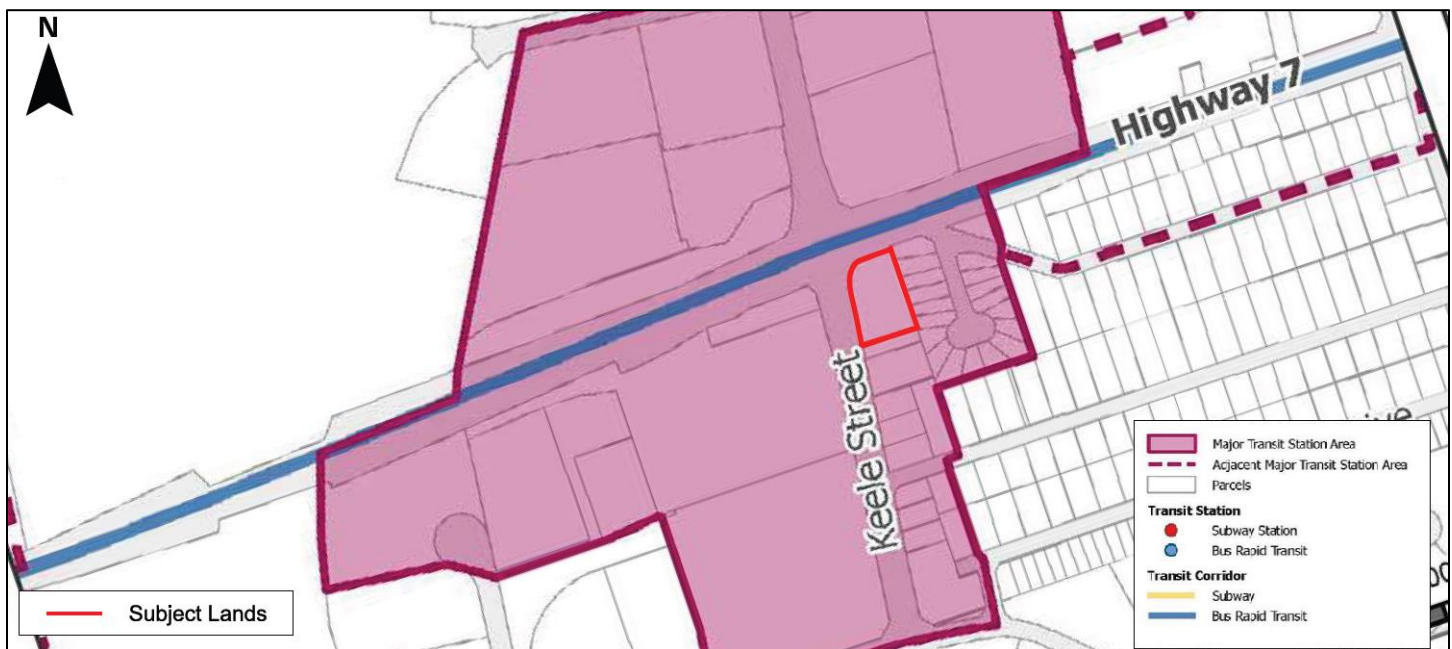


Figure 4 – Appendix 2 (York Region MTSAs), York Region Official Plan 2022

Description of Proposed Development and Planning Applications

The Subject Property is proposed to be redeveloped for a mixed-use, mid, and high-rise residential condominium building comprised of a 16-storey tower and a 12-storey tower which are connected by a 2-storey podium. A residential Gross Floor Area (“GFA”) of 25,571 square metres is contemplated with a Floor Space Index (“FSI”) of 4.3. There are 350 apartment units proposed within the building along with 352 underground parking spaces. At-grade retail is proposed at a GFA of 974 square metres.

Per our meeting with Regional and City Planning Staff dated February 24, 2022, it was agreed that an employment conversion request and Regional ROPA were not required to permit the proposed development. The Subject Property was considered to be already converted given that the site is no longer considered as an employment land at the Regional policy level. This determination was formalized upon Provincial approval of the YROP 2022, which designates the Subject Property as *Community Area*. Regional and City Planning Staff agreed that only a local Official Plan Amendment is required, and that the proponent will not need to proceed through a formal employment land conversion process.

A local Official Plan Amendment (OP.23.004) and Zoning By-law Amendment (Z.23.006) were submitted on April 5, 2023 to permit the proposed development. The applications will seek site-specific exceptions to the VOP 2010, Zoning By-laws 1-88 and 001-2021 to permit residential and commercial uses on the Subject Property. The applications were deemed complete on May 12, 2023 without an employment conversion request, further confirming that the lands are already considered converted.

City of Vaughan Official Plan Review

We understand that the City of Vaughan is undertaking an Official Plan Review that will update the Vaughan Official Plan to achieve consistency with the Provincial Policy Statement 2020 and conformity with the Provincial plans, including the Growth Plan for the Greater Golden Horseshoe 2020 and the residential and employment growth targets up to the 2051 planning horizon. A project update and draft Official Plan schedules were presented to the Official Plan

Update Sub-Committee on July 12, 2023. The project is near the end of Phase 2 (Policy Development) and beginning to move into Phase 3 (Statutory Approval). Phase 3 includes public release of the Draft Official Plan Amendment and Schedules for feedback.

Site-Specific Comments

Draft Part A OPA Schedules

We have reviewed the Draft Part A OPA and Schedules dated September 2023. The Subject Property is proposed to be designated as *Employment Area* and *Regional Intensification Corridors with Employment Areas* per the draft Schedule 1 (Urban Structure) and Schedule 1A (Strategic Growth Areas), respectively.

We request that City Staff reconsider these proposed urban structure designations for the Subject Property. As earlier outlined, the YROP 2022 designates the Subject Property as *Community Area*, which does not permit employment uses but permits residential and retail uses. Based on the policies of the current *Regional Intensification Corridors within Employment Areas* designation within the in-force VOP 2010, we assume that residential uses would continue to be precluded on lands designated as such in the updated Official Plan.

It is our opinion that the proposed designations for the Subject Property per the draft Schedule 1 and Schedule 1A do not conform to the policies for the *Community Area* and *Regional Corridor* designations of the YROP 2022. The *Community Area* and *Regional Corridor* policies plan for mixed-use intensification on the Subject Property, which is inclusive of residential intensification, in order to meet the 2051 residential and employment growth targets of the Growth Plan 2020. As such, there is a minimum density target of 160 persons and jobs per hectare prescribed for the Keele BRT MTSA per Appendix 2 of the YROP 2022. The proposed *Regional Intensification Corridors within Employment Areas* Urban Structure designation would preclude residential intensification on the Subject Property and hinder the abilities of the City and individual landowners to meet the growth targets for the Keele BRT MTSA, which does not conform to the policies of the YROP 2022.

To achieve conformity with the YROP 2022, we recommend that the proposed urban structure designations be revised to *Community Area* on draft Schedule 1 and *Regional Intensification Corridors* on draft Schedule 1A in the Part A OPA. These revisions would permit residential intensification on the Subject Property in conformity with the YROP 2022.

Draft Part A OPA Policies

We understand that draft Policy 2.2.4.6 is proposed in the Part A OPA text which would require an OPA to facilitate the removal of lands from municipal *Employment Areas* as identified on Schedule 1 that are outside a Regional Employment Area. It is our understanding that the intention of draft Policy 2.2.4.6 is to ensure that the removal of any municipal employment lands would not have an adverse effect on the City's ability to meet its employment growth targets or the functionality of other employment lands. To this effect, the criteria listed under draft Policy 2.2.4.6 include the criteria under Policy 2.2.5.9 of the Growth Plan for the Greater Golden Horseshoe 2020 ('Growth Plan 2020'), along with additional criteria respecting compatibility, jobs, and cross-jurisdictional issues that are derived from York Region's Employment Area Conversion Criteria and which were considered during the Regional MCR. Draft Policy 2.2.4.7 states that the removals referred to in Policy 2.2.4.6 are subject to Regional approval.

We believe that the Subject Property is proposed to be designated as *Employment Area* and *Regional Intensification Corridors within Employment Areas* in draft Schedules 1 and 1A because draft Policy 2.2.4.6 intends to impose a

requirement for proponents requesting non-employment uses on municipal employment lands within non-Regional Employment Areas to undergo a local employment conversion process.

While we appreciate the intention of draft Policies 2.2.4.6 and 2.2.4.7, we reiterate that the Subject Property is considered to be already converted at the Regional policy level as discussed earlier given its *Community Area* designation in the YROP 2022. The Subject Property was already considered against the conversion criteria of the Growth Plan 2020 and the Region's Employment Area Conversion Criteria as part of the MCR process which resulted in the *Community Area* designation in the YROP 2022. Given this, it is our opinion that the Subject Property is already converted and should be reflected as such at the municipal policy level. Moreover, there are active OPA and ZBA applications to permit high-rise, mixed-use development on the Subject Property that do not include an employment conversion request, and which were deemed complete in May 2023 on the basis that such a request was determined to be unnecessary by municipal and Regional Staff as earlier discussed. Accordingly, we request that the Subject Property be shown as *Community Area* on draft Schedule 1 and *Regional Intensification Corridors* on draft Schedule 1A.

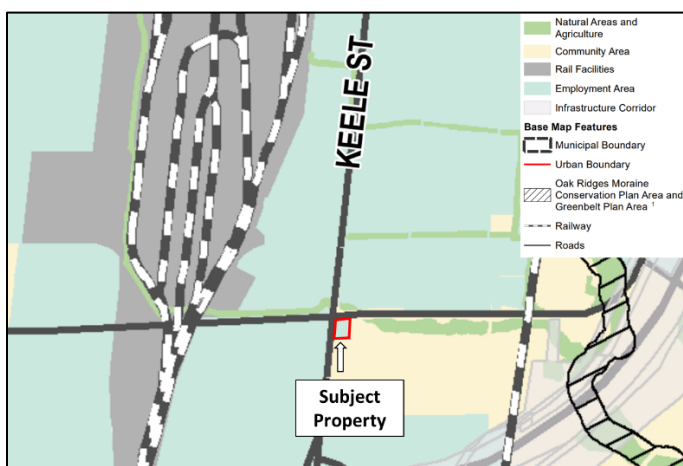


Figure 5 – Draft Schedule 1 (Urban Structure), Draft Part A OPA (September 2023)

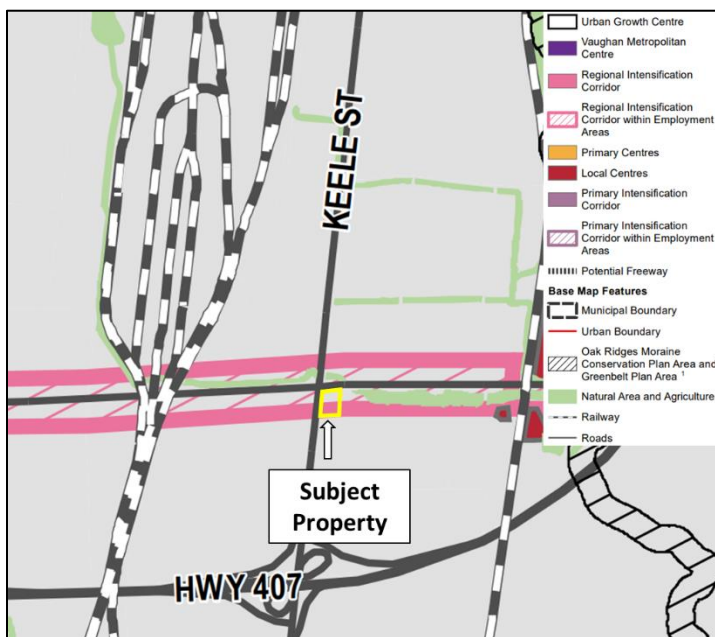


Figure 6 – Draft Schedule 1A (Strategic Growth Areas), Draft Part A OPA (September 2023)



Conclusions

We have reviewed the Draft Part A OPA and Schedules, particularly Schedule 1 (Urban Structure) and Schedule 1A (Strategic Growth Areas) which proposes the *Employment Areas* and *Regional Intensification Corridors within Employment Areas* designation for the Subject Property, respectively. It is our opinion that the proposed designations would not conform to the *Community Area* and *Regional Corridor* policies of the YROP 2022, which plan for and permit mixed-use intensification on the Subject Property to meet the minimum density target of 160 persons and jobs per hectare prescribed for the Keele BRT MTSA. Furthermore, the Subject Property was already converted from an *Employment Area* to a *Community Area* in the YROP 2022 through the Regional MCR process. Municipal and Regional Staff agreed upon this determination per our email correspondence from March 2022. We request that City Staff revise the proposed urban structure designations for the Subject Property to *Community Areas* and *Regional Intensification Corridors* on draft Schedules 1 and 1A, respectively, which would permit residential intensification to meet the minimum density target in conformity with the YROP 2022.

We request that the comments contained herein be kept on record within the Official Plan Review process. We further request to be notified of any further studies, revisions, approvals and/or notices applicable to the Official Plan Review process and reserve the right to provide further comments as more information becomes available. Should you have questions or require anything further, please do not hesitate to contact the undersigned (ext. 241) or Steven Pham (ext. 312).

Yours truly,

Weston Consulting

Per:

Ryan Guetter, BES, MCIP, RPP
Executive Vice President

c. Addington Developments