

**HUMPHRIES PLANNING GROUP INC.**

FOUNDED IN 2003

September 29, 2023

HPGI File: 0449

City of Vaughan Office of the City Clerk  
2141 Major Mackenzie Drive  
Vaughan, Ontario  
L6A 1T1

**Attention: Mr. Todd Coles, City Clerk**

**Re: Committee of the Whole Pubic Meeting, October 3, 2023**  
**Vaughan Official Plan Review (File PL-9550-16)**  
**Vaughan 400 North Landowners Group Inc. (the "Group")**  
**Blocks 34W and 35 (the "Subject Lands")**

Humphries Planning Group Inc (HPGI) represents the Group, which consists of numerous landowners within the Highway 400 North Employment Lands Secondary Plan Area in the City of Vaughan ("Vaughan" or the "City"). On behalf of the Group, HPGI has filed numerous letters of correspondence and have appeared before members of Council and made formal deputations at various City and Regional Committee/Council meetings in support of the Group's Employment Area Conversion Request as part of the Regions Municipal Comprehensive review and update to the Regional Official Plan. On October 22, 2020, Regional Council resolved to approve the partial employment area conversion request 'V7' related to Blocks 34 West and 35 in the City of Vaughan.

The City of Vaughan initiated its Official Plan Review on October 13, 2021. The Official Plan Review is required to update the Vaughan Official Plan, 2010 to maintain conformity with the York Region Official Plan and Provincial plans, policies and legislation. The comprehensive update to the Vaughan Official Plan will be delivered through two separate amendments: Part A and Part B. The draft Part A Official Plan Amendment deals solely with conformity to Provincial and Regional policy and Provincial legislation. In September 2023, the draft City of Vaughan Official Plan (the 'VOP') was released to the public for review and comment and represents Part A of the Official Plan Amendment. It is our understanding that the deadline for written comments respecting the draft VOP is October 2, 2023. We have reviewed the draft VOP including newly proposed mapping, and policies and wish to provide a number of comments, as outlined below.

**Employment Area Mapping & Policies**

Schedule 1 – Urban Structure of the draft VOP identifies Block 35 as being designated 'Employment Area' and 'Natural Heritage Area' with Greenbelt Plan overlay, respectively. The

proposed mapping fails to recognize the Groups partial employment area conversion approval as illustrated in the York Region Official Plan which provides for employment area along the periphery of the Highway 400 corridor while the balance of the lands are intended serve as a future Community Area. It appears that Appendix 1 – Regional Employment Areas and Densities of the draft VOP correctly delineates the extent and boundary of the approved partial employment conversion.

As a corollary to the above, Section 2.2.4.6 of the draft VOP states that, *“the removal of lands through re-designation from Employment Areas as identified on Schedule 1 that are outside a Regional Employment Area will require an Official Plan Amendment”* and subject to a number of assessment criteria. Through this policy, and the associated mapping, it appears that the City is requiring an amendment for the Groups lands in order to redesignate portions of Employment Area to Community Area as they are no longer located within a Regional Employment Area but still form part of the City employment land base. It is unclear why the City has not recognized the Groups partial employment area conversion to non-employment uses, as approved by Regional Council, in their own mapping and the need for additional analysis and justification for their removal through a future Amendment process.

It should be noted that the City of Vaughan was consulted with and closely participated with the Region throughout the MCR process providing comments and feedback on various policy directions that included, among other things, employment area conversion requests. Prior to Regional consideration and approval, City staff had the opportunity to evaluate the 30 conversion requests originating in the City, including the Groups, and provided Council with recommendations on their disposition. While Staff did not recommend conversion, Vaughan Council endorsed the Groups request. Councils’ endorsement was ultimately used to inform Regional Council’s decision in considering and approving the Groups employment land conversion requests. It is recognized that through the previous MCR process and the associated conversion assessment and evaluation process, it has already been demonstrated that the redesignation of the Groups lands from employment area to non-employment use satisfies Provincial, Regional and Local conversion criteria. The requirement for further amendments as outlined in proposed Section 2.2.4.6 of the draft VOP is inconsistent with the York Region Official Plan, is unnecessary, and redundant. We kindly request that the policy be updated to ensure consistency and conformity with the York Region Official Plan including either the restructuring or removal of redundant section 2.2.4.6 as it applies to the Groups lands.

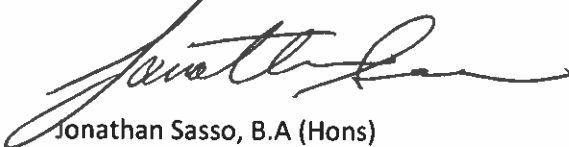
#### **Employment Area Densities**

Table 2: Density Targets for Regional Employment Areas in Vaughan establishes a density target for the Vaughan 400 North Employment Zone as 55 jobs per hectare based on net developable area. Section 2.2.4.10 of the draft VOP states that *“development in Regional Employment Areas*

*identifies in Appendix 1 will be planned to achieve the minimum density target (measured as jobs per hectare in the developable area) identified in Table 2."* The policy above fails to recognize a notation contained in Section 4.3.21 of the York Region Official Plan (2022) which states *"that employment densities apply on an average basis, not on an employment area by employment area or parcel by parcel basis"*. It is recognized that over the past several decades, the economic landscape of the GTHA and York Region has undergone significant transformation as the broader regional economy continues to evolve. Office growth is being re-defined as a result of computer and digital technologies, and the emergence of e-Commerce has resulted in significant growth in the distribution and logistics sector and continues to impact traditional retail operations. Recognizing the restructuring of traditional industrial and manufacturing employment, in favor of warehousing, distribution centres, transportation terminals and other uses of a logistics nature paired with Block 35's strategic location and access to the Highway 400 corridor, it is likely that the Block will develop as a continuation of existing patterns and trends. However, despite these types of facilities being land extensive, distribution facilities densities can produce densities as low as 5-10 jobs per hectare as compared to much higher densities per hectare in employment areas with large concentrations of professional services employment in office and multi-unit industrial buildings. The language contained in the draft VOP represents a "minimum" and is more prescriptive and determinative than that of the Regional OP. The intent of the Regional density was more of an aspiration target to be applied on an average basis. We kindly request this policy be modified for conformity with Regional policy direction.

Thank you for your consideration of our comments and we look forward to working closely with Council, Staff and other stakeholders throughout the completion of the Official Plan Update. On behalf of the Group, we request to be notified concerning the City's Official Plan Review including any and all future Council/Committee meetings, community meetings and consultation as well as the release of any discussion papers or proposed amendments to the VOP.

Yours truly,  
**HUMPHRIES PLANNING GROUP INC.**



Jonathan Sasso, B.A (Hons)  
Senior Planner

cc: Vaughan 400 North Landowners Group Inc.