



October 2, 2023

COMMUNICATION C20.
ITEM NO. 2
CW (PM)
October 3, 2023

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City of Vaughan
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Attention: **Todd Coles,**
 City Clerk

Re: **Livwest North Inc. and Liveast North Inc., c/o Zzen Group**
 City of Vaughan Official Plan Review
 6701 & 6751 Highway 7
 Part of Lots 4 & 5, Concession 9 & 10 and Part of the Road Allowance between
 Concession 9 & 10
 City of Vaughan, Regional Municipality of York

Dear Mr. Coles,

KLM Planning Partners Inc. are land use planners for Livwest North Inc., c/o Zzen Group (the "Owners"), with respect to the lands legally known as Part of Lots 4 & 5, Concession 9 & 10 and Part of the Road Allowance between Concession 9 & 10, City of Vaughan (the "Subject Lands"). We are writing on behalf of the Owners to provide comments and participate in the City of Vaughan's Official Plan review process.

We understand that the Official Plan review process will be completed in two parts, a Part A Official Plan Amendment (the "Part A Draft OPA"), which is a conformity exercise with the latest Region of York Official Plan (the "Regional OP") and Provincial policy, and a Part B Official Plan Amendment (the "Part B Draft OPA"), which goes beyond the scope of the conformity exercise providing for a fulsome review and update of the City of Vaughan Official Plan (the "City OP"). The purpose of this letter is to provide feedback to the City of Vaughan (the "City") on the Part A Official Plan Amendment.

The Subject Lands consist of two parcels of land on the west and east sides of Gibraltar Road on the south side of Highway 7 generally between Highway 50 and Highway 427 in the City of Vaughan Planning Area Block 57. The lands are municipally known as 6701 and 6751 Highway 7 and include a portion of the now stopped up and closed right of way between Highway 7 and Highway 50, formerly a portion of Huntington Road. The parcels have a combined area of approximately 16.45 hectares (40.64 acres) with approximately 750 and 235 metres of frontage on Highway 7 and Highway 50 respectively. The lands are currently vacant agricultural fields with no primary or accessory structures with the former road allowance being occupied by a gravel roadway and associated utilities. The lands are generally rectilinear in shape with no discernible natural features.

The Owners of the Subject Lands previously participated in the review of the Regional OP and submitted an employment land conversion request to the Region of York (the "Region") in accordance with A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan"). The City was also provided with an opportunity to assess each employment land conversion request within the City. Through this

assessment, City of Vaughan Council (the “City Council”) considered and endorsed the employment land conversion request at its meeting on May 27, 2020 and the Region of York Council (the “Regional Council”) approved the request at its meeting on October 15, 2020.

The Regional OP currently designates the Subject Lands as *Urban Area, Community Area and Designated Greenfield Area* on Map 1 Urban Structure, Map 1A Land Use Designations and Map 1B Urban System Overlays respectively. Highway 7 abutting the Subject Lands is identified as a *Regional Corridor* on both Map 1 Urban Structure and Map 1B Urban System Overlays. In this regard, the Subject Lands are no longer within an employment area as defined by the Growth Plan.

The current City OP designates the Subject Lands *Employment Area and Urban Area* on Schedule 1 Urban Structure and Schedule 1A Urban Area respectively. Highway 7 abutting the Subject Lands is identified as *Regional Intensification Corridors within Employment Areas, Major Arterial (Regional)* and *Regional Rapid Transit Corridor* on Schedule 1 Urban Structure, Schedule 9 Future Transportation Network and Schedule 10 Major Transit Network respectively.

The Draft Part A Official Plan Amendment Schedules (the “Draft OP Schedules”), continue to designate the Subject Lands as *Employment Area*. Notwithstanding the *Community Area* designations of the Regional OP, the lands subject to approved employment land conversions in the City all appear to be shown as *Employment Area*, including the Subject Lands. Further, it appears that no other land designated *Community Area* by the Regional OP are designated *Employment Area* by the Draft OP Schedules. This approach of designating *Community Area* as *Employment Area*, is inconsistent with the Regional OP. The Draft OP Schedules not only result in inconsistencies with the Regional OP land use designations, in that they do not recognize all general *Community Area* permissions, they are inconsistent with each other in that they continue to designate the Subject lands as *Employment Area* but remove them from the *West Vaughan Employment Area* on Appendix 1 Regional Employment Area Densities.

The approach taken by staff to identify lands approved for employment land conversion requests as *Employment Area*, appear to demonstrate a degree of disregard for the will and decisions of Regional Council and City Council. The criteria outlined in the Part A Draft OPA for lands already approved for employment conversion would require what amounts to a repeat of a process already approved by Regional Council and endorsed by City Council. This approach would be wasteful, demonstrates a lack of acceptance for the will and decision of Councils and will unnecessarily prolong future Planning Act approval processes for lands already approved for employment conversion. Further, this approach may not conform to the requirements of the Growth Plan which suggests that conversions of lands within employment areas to non-employment uses may only be permitted through the municipal comprehensive review of an upper tier municipality, which the City of Vaughan is not. In this regard, the Owners request that policy 2.2.4.6 and 2.2.4.7 be deleted in their entirety from the Part A Draft OPA.

Given the approved employment land conversion request on the Subject Lands, as supported by City Council, we believe that the existing *Employment Area* land use designation is no longer appropriate or suitable to implement the Regional OP. Further, it is no longer appropriate that Highway 7 abutting the Subject Lands be identified as *Regional Intensification Corridors within Employment Areas* as the lands are no longer designated *Employment Area* in the Regional OP.

Further, the Owners request that City Council consider designating the Subject Lands as a *Primary Centre* based on the following rationale.

The Subject Lands directly abut an Ontario Ministry of Transportation (the "MTO") transit facility which is contemplated to include a commuter parking area, passenger pickup and drop off and bus loop that will have direct access to the proposed Highway 427 Transitway. In addition, Metrolinx in consultation with MTO, is undertaking an assessment of a 24 kilometer extension to the existing Highway 7 Bus Rapid Transit route (a "BRT"), which currently terminates approximately 4.5 kilometers east of the Subject Lands. This contemplated BRT extension would provide a higher order transit connection into Peel Region, and result in a transit corridor connecting the northwest and north central sections of the Greater Toronto and Hamilton Area. Further, this BRT system would provide connections to transit hubs such as the Downtown Brampton Transit Hub and Vaughan Metropolitan Centre, which would provide connections to other existing regional networks operated by GO Transit and the Toronto Transit Commission as well as the future Yonge North Subway Extension into Richmond Hill.

The Subject Lands would be at the approximate midpoint of the contemplated BRT extension between the Vaughan Metropolitan Centre and Downtown Brampton being roughly 13.5 kilometers from Main Street and Queen Street in Brampton and 9.5 kilometers from the Vaughan Metropolitan Centre. The designation of the Subject Lands as a *Primary Centre*, which is a strategic growth area would represent the integration and coordination of infrastructure planning, land use planning, and infrastructure investment as contemplated by the Growth Plan. Further, designating the Subject Lands as a *Primary Centre* would coincide with the location and distribution of existing strategic growth areas in the City along the Highway 7 corridor and other Regional Corridors and at locations adjacent to 400 series highways and interchanges.

Providing a strategic growth area on the Subject Lands will have the long-term effect of reducing private automobile dependent trips and encourage public transit usage within the City and abutting municipalities. Further, the critical mass and emphasis to support the viability of transit infrastructure can be provided and strengthened making for efficient use of financial resources that have been dedicated to this infrastructure. In addition, the Provincial objective of mixed-use complete communities that provide for a live, work and play environment that is supportive of the Province and Region's investments in infrastructure can be achieved. Lastly, providing for population growth on the Subject Lands will relieve development pressure in peripheral designated greenfield areas, rural areas and agricultural areas allowing the City to more efficiently accommodate planned growth within the existing *Urban Area* of the City and Region.

For the reasons outlined above, the Owners request that the City redesignate the Subject Lands as *Community Area* and *Primary Centres* as well as identify Highway 7 abutting the Subject Lands as *Regional Intensification Corridors* on Schedule 1 Urban Structure and Schedule 1A Strategic Growth Areas in the manner shown on Appendix 'A' to this letter. Further, the Owners request that the stopped up and closed portion of Huntington Road be removed from all Official Plan schedules that currently identify these lands as a local road.

In conclusion, we believe that the Owners' requests align with the relevant Provincial planning objectives and conform to the land-use policies established in the Regional OP and Growth Plan. We respectfully request that City Council consider the above opinion and direct staff to implement the redesignation requests through the review of the Official Plan. Further the Owners wish to affirm their commitment to working with the City through the ongoing Official Plan review including the future Part B Draft OPA.

We look forward to any further discussions on this matter with the City. Please do not hesitate to contact the undersigned if there are any questions or concerns or if you require any additional information.

Yours truly,

KLM PLANNING PARTNERS INC.



Robert Lavecchia BURPI, MCIP, RPP
Associate

CC: Joseph Sgro, Zzen Group of Companies
Sam Speranza, Zzen Group of Companies
Haiqing Xu, Deputy City Manager, Planning and Growth Management

APPENDIX 'A'

REQUESTED PART A OFFICIAL PLAN AMENDMENT SCHEDULES

The City of Vaughan makes every effort to ensure that Schedules are free of errors but does not assert that the schedules are spatially, tabular or temporally accurate. The Schedules are provided by the City of Vaughan without warranties of any kind, either expressed or implied.

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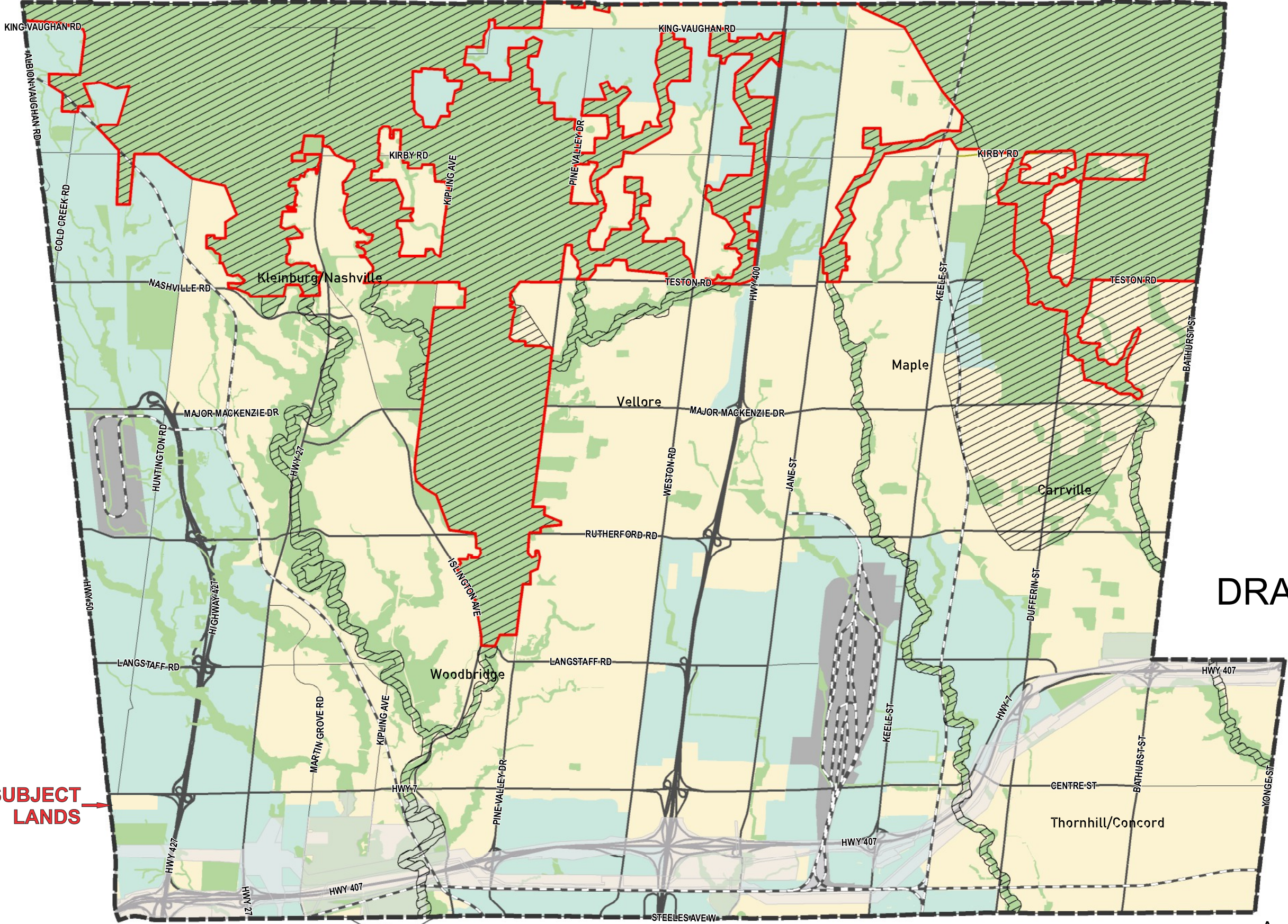


Urban Structure

- Natural Areas and Agriculture
- Community Area
- Rail Facilities
- Employment Area
- Infrastructure Corridor

Base Map Features

- Municipal Boundary
- Urban Boundary
- Oak Ridges Moraine Conservation Plan Area and Greenbelt Plan Area ¹
- Railway
- Roads



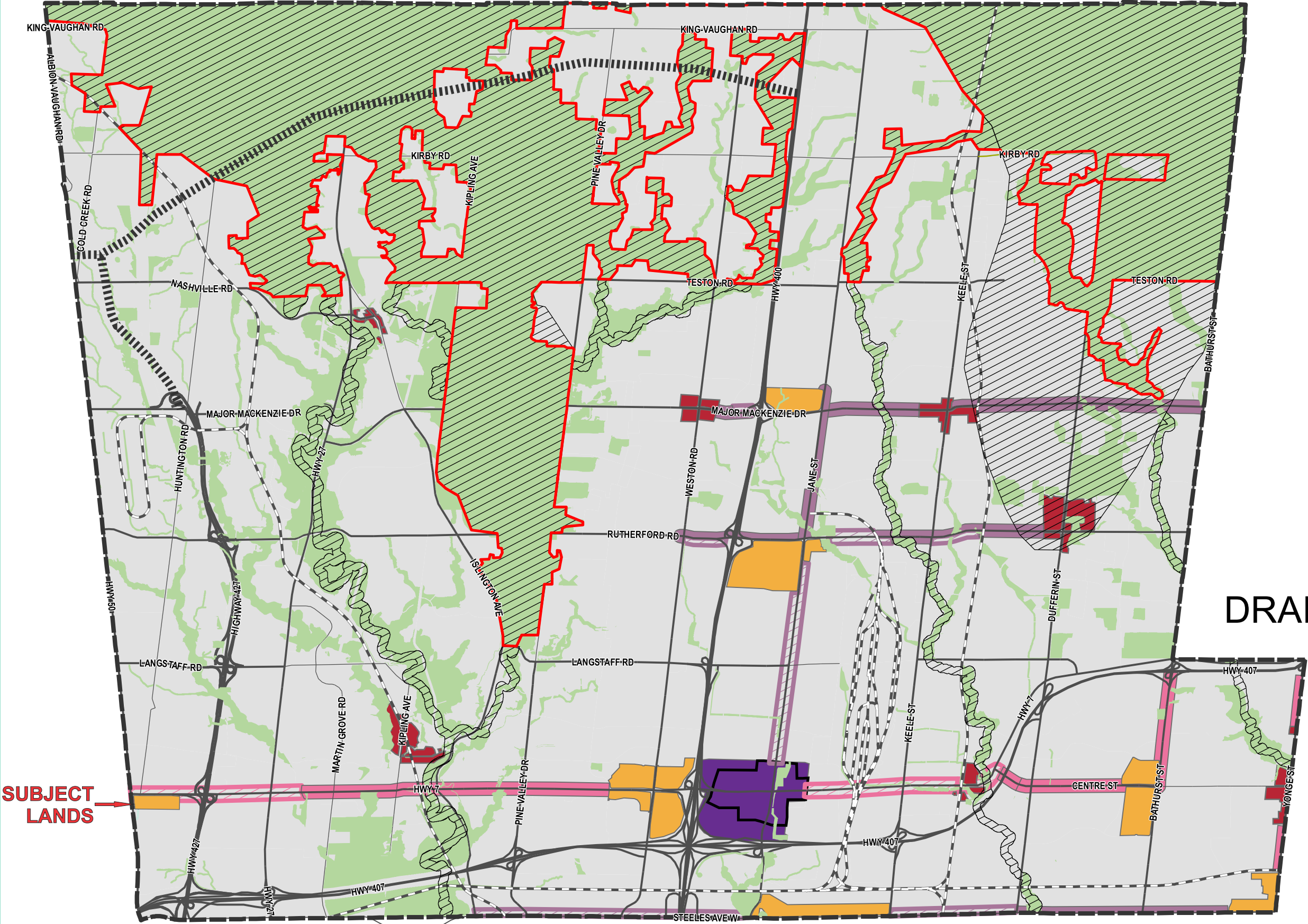
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ATTACHMENT 2

¹ See Schedule 4 for limits and the land use information of the Greenbelt Plan Area and the Oak Ridges Moraine Conservation Plan Area.

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SCHEDULE 1A
Strategic Growth Areas

- Urban Growth Centre
- Vaughan Metropolitan Centre
- Regional Intensification Corridor
- Regional Intensification Corridor within Employment Areas
- Primary Centres
- Local Centres
- Primary Intensification Corridor
- Primary Intensification Corridor within Employment Areas
- Potential Freeway
- Base Map Features
 - Municipal Boundary
 - Urban Boundary
 - Oak Ridges Moraine Conservation Plan Area and Greenbelt Plan Area ¹
 - Natural Area and Agriculture
 - Railway
 - Roads

¹ See Schedule 4 for limits and the land use information of the Greenbelt Plan Area and the Oak Ridges Moraine Conservation Plan Area.