

C151.
Communication
CW(PM) – June 4, 2025
Item No. 10

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

June 3, 2025
File: 9816 and 9819

Attn: City of Vaughan Clerks Office

RE: Vaughan Official Plan Review
20 and 40 Graniteridge Road and 351 Caldari Road
1-7, 2-8 and 10 Director Court and 3700 Steeles Avenue

Weston Consulting is the planning consultant for the Sorbara Group of Companies, the group which represents *D.I.P. Holdings Inc.*, and *Director Industrial Holdings Inc.*, the registered owners of 1-7, 2-8 and 10 Director Court and 3700 Steeles Avenue West, as well as *Realty Growth II Inc.*, the registered owners of 20 and 40 Graniteridge Road and 351 Caldari Road, in the City of Vaughan (the “subject lands”). On behalf of the ownership group, we are pleased to provide the following correspondence on the City of Vaughan Draft Official Plan that was released for comment in May 2025.

It should be noted that Weston Consulting submitted letters to the Regional Municipality of York in 2020 as part of the Municipal Comprehensive Review to request an Employment Lands Conversion for the subject lands. Although the Region is no longer an upper-tier municipality with planning responsibilities, the rationale in the May 2020 letters remain valid and should be read in conjunction with this letter.

Property Description and Surrounding Area

The properties located at 20 and 40 Graniteridge Road and 351 Caldari Road are comprised of three individual parcels of land located south-west of the Rutherford Road and Jane Street intersection. These parcels have frontage along Graniteridge Road and Caldari Road and a combined area of approximately 89,798 square metres (22.19 acres). These properties are currently occupied by light industrial uses, as well as related office and accessory sales uses, with the exception of 20 Graniteridge Road, which is currently occupied by a distribution centre. They are currently designated *General Employment* by the Vaughan Official Plan (VOP) and are near the Vaughan Mills Centre Secondary Plan and its related planned residential and mixed-use designations.

The properties located at 1-7, 2-8 and 10 Director Court and 3700 Steeles Avenue West are four individual parcels of land located on the north side of Steeles Avenue, northeast of the Steeles Avenue West and Weston Road intersection. These lands have frontage along Steeles Avenue West and Director Court are approximately 43,589 square metres (10.77 acres). 1-7 and 2-8 Director Court and 3700 Steeles Avenue west are currently *Employment Commercial Mixed-Use* and 10 Director Court is designated *Prestige Employment* in the VOP. All parcels are currently occupied by office uses.

City of Vaughan Official Plan Review

We have reviewed the policies and schedules of the Draft VOP released to date and are pleased to provide the following comments:

20 and 40 Graniteridge Road and 351 Caldari Road

The properties located at 20 and 40 Graniteridge Road and 351 Caldari Road are located within an *Employment Areas* and adjacent to a Strategic Growth Area according to Schedule 1 (Urban Structure) of the Draft VOP. Schedule 13 (Land Use Designation) designates these parcels *General Employment*. In our opinion, the location of these parcels adjacent to the Vaughan Mills Centre Secondary Plan, which has a planned residential and mixed-use designation, make them an appropriate location of future mixed use development. We request staff consider revising the draft VOP to apply a mixed use designation to these parcels in recognition of their location between the Vaughan Mills Centre Secondary Plan area to the west and the natural areas to the east. A mixed use designation that permits commercial and employment uses would allow for an appropriate transition to nearby employment and residential uses and future redevelopment of these parcels with a mix of uses will provide density that is in proximity to existing and planned transit infrastructure.

1-7 and 2-8 Director Court and 3700 Steeles Avenue

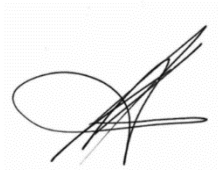
The properties located at 1-7, 2-8 Director Court and 3700 Steeles Avenue West are within a *Strategic Growth Area* according to Schedule 1 and designated *Non-Residential Mixed Use* and *Prestige Employment* according to Schedule 13 of the Draft VOP. Schedule 1B (Strategic Growth Areas) identifies these parcels along a *Local Corridor within Employment Area*.

We request that Staff consider amending the Draft VOP to apply a mixed use designation to these parcels as they no longer meet the definition of “areas of employment” under the Planning Act and Provincial Planning Statement due to the existing standalone office use. Policy 2.4.1 of the draft VOP also directs that Strategic Growth Areas will “*facilitate the development of a mix of uses and appropriate densities to support high level existing or planned transit, walking, cycling and other forms of Active Transportation. Strategic Growth Areas shall have the highest rate of new residential growth, and shall support Major Office, Major Institutional and Retail uses.*” Mixed use permissions for residential, office and commercial uses would be compatible with the surrounding area and promote intensification in proximity to planned and existing transit infrastructure in accordance with Policy 2.4.1.

Weston Consulting will continue to monitor the Official Plan Review process and reserves the right to provide further comments on this matter. We request to be notified on any future updates as well as any discussion pertaining to the designations and policies pertaining to the subject lands, and to receive notice of any decisions by Committee and/or Council regarding this matter.

Thank you for the opportunity to provide these comments. Please contact the undersigned at rguetter@westonconsulting.com or Darrin Cohen at dcohen@westonconsulting.com should you have any questions regarding this submission.

Yours truly,
Weston Consulting
Per:



Ryan Guetter, BES, MCIP, RPP
President



Darrin Cohen, MCIP, RPP
Senior Planner

- c. Sorbara Group of Companies
Fausto Filipetto, Project Manager, City of Vaughan

Attach: Region of York Municipal Comprehensive Review Submission Letters, March 2020



WESTON CONSULTING

planning + urban design

Regional Municipality of York
17250 Yonge Street
Newmarket, ON
L3Y 4W5

March 11, 2020
File 9819

Attn: Paul Freeman, Chief Planner
Region of York

Dear Sir,

RE: Region of York Municipal Comprehensive Review
Employment Lands Conversion Request
1-7, 2-8, and 10 Director Court; and 3700 Steeles Avenue West
City of Vaughan

Weston Consulting is the planning consultant for the Sorbara Group of Companies, the group which represents "*D.I.P. Holdings Inc, and Director Industrial Holdings Inc,*" the registered owners of the properties municipally addressed as 1-7, 2-8, and 10 Director Court, and 3700 Steeles Avenue West, in the City of Vaughan (herein referred to as the "subject lands"). We have been engaged to provide assistance to Sorbara Group during York Region's Municipal Comprehensive Review ("MCR") process.

We recognize that this request is being provided after the region's previous deadlines imposed in the fall; however, we are not aware that there is a statutory deadline and we recognize that input from the Province is pending, which could impact overall land needs assessment considerations. We also recognize that interrelationships between those inputs and local municipal recommendation as well as the staff report recommendations of March 12 could impact further changes to the considerations of conversion requests, prior to decisions made by council.

Property Description and Surrounding Area

The subject lands consist of four separate parcels of land located on the north side of Steeles Avenue, northeast of the major intersection of Steeles Avenue West and Weston Road. The subject lands have frontage along Steeles Avenue West and Director Court, and have a combined area of approximately 43,589m² (10.77 Acres, 4.36 ha)

1-7 and 2-8 Director Court, and 3700 Steeles Avenue West are designated "*Employment Commercial Mixed-Use,*" and 10 Director Court is designated "*Prestige Employment*" by the City of Vaughan Official Plan. All parcels are currently occupied by office uses, some of which are an outdated format.



Surrounding Land Uses

The following land uses are located adjacent to the subject lands:

- North: Directly north of the subject lands, within the “*Prestige Employment*” designation, is an industrial bakery with associated offices, a small warehousing and office building, as well as an abandoned former golf driving range.
- South: The subject lands abut the municipal boundary with the City of Toronto to the south, within the areas designated “*General Employment Area*” by the City of Toronto Official Plan, there are fuel stations, restaurants, retail and a banquet hall, and further south in the “*Core Employment Areas*” There are light industrial as well as automotive sales and service uses.
- East: Directly east of the subject lands is a hotel, and the ramp from Steeles Avenue West onto the Southbound Highway 400.
- West: To the immediate west of the property located in the “*Employment Commercial Mixed Use*” designation, there are office uses, beyond which there is a mix of office, retail, and light to heavy industrial uses.

Although currently designated for employment, the subject lands are not considered a Core Employment Area within the context of the “*Strategic Employment Lands*” areas depicted in Figure 2 (York Region Strategic Employment Lands) of the York Region Official Plan.

Steeles Avenue West is designated as an intensification corridor by the City of Vaughan Official Plan. Although the land use designation outlined for the subject lands includes *Prestige Employment* and *Employment Commercial Mixed-Use*, the subject lands are compatible with a wider range of uses, not limited to those for which they have been designated, to support the city’s intensification objectives.

Provincially Significant Employment Zones

Weston Consulting acknowledges that the subject lands are located within the “*Provincially Significant Employment Zones*” in conjunction with A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (the “Growth Plan”).

Planning Context

The subject lands are located within an Employment Area and are designated “*Prestige Employment*” and “*Employment Commercial Mixed-use*” under the City of Vaughan Official Plan.

Our client is currently considering the opportunity to retain existing uses on the site, but add medium and high-density, mixed-use permissions for the subject lands, fulfilling the goals and objectives of the Provincial Policy Statement, which directs growth to built-up areas, where services such as public transportation are already available, and that encourages a mix of employment, residential and institutional uses in order to create communities that are conducive to active transportation and promote the use of public transportation. Converting to mixed use would allow for employment densities to be maintained on the site, while achieving a more efficient use of available lands along a designated intensification corridor, better utilization of existing public transportation systems, all while protecting the long-term viability of the nearby employment properties.

Given the location of the subject lands along the previously mentioned Regional Intensification Corridor, we believe the site, and in particular the underutilized portions thereof, is appropriate for the mentioned conversion and increase in density. The City of Vaughan Official Plan states that Regional Intensification Corridors are intended to accommodate some of the most intensive and greatest mix of development in the City. Densities in these areas are intended to be supportive of higher-order transit services, which are intended to be located on Regional Transit Priority Corridors, such as Steeles Avenue West. Allowing this conversion is in keeping with the intent of these principals.

Employment Lands Conversion

The Region is undertaking a review of their Official Plan policies as part of the MCR process, including the employment policies. Staff are currently undertaking an analysis of the Region's employment land needs to 2041 and the need to identify and protect employment lands for the long term. As such, we request the consideration of the conversion of the subject lands to facilitate new mixed-uses.

The conversion of employment lands to non-employment uses may be permitted where it can be demonstrated that the conversion adequately addresses the five (5) criteria set out in Section 2.2.5.9 of the Growth Plan. In addition, York Region Council recently adopted 9 additional criteria under which employment conversion requests will be assessed. According to these combined criteria, the conversion of lands within employment areas to non-employment uses may be permitted where it is demonstrated that:

1. *There is a need for the conversion;*
2. *The lands are not required over the horizon of [the Growth Plan] for the employment purposes for which they are designated;*
3. *The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of [the Growth Plan];*
4. *The proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in [the Growth Plan], as well as the other policies of [the Growth Plan];*
5. *There are existing or planned infrastructure and public service facilities to accommodate the proposed uses;*
6. *The following employment areas will not be considered for conversion as they have not yet had the opportunity to develop due to servicing constraints or have recently been brought into the urban boundary to accommodate employment land employment growth to 2031: Keswick Business Park, Queensville, Highway 404 (ROPA 1), ROPA 3, and Highway 400 North (ROPA 52);*
7. *The employment area will not be considered for conversion if the entire perimeter of the site is surrounded by lands designated for employment uses and is not viable to continue as an employment area;*
8. *Conversion of the site would not compromise the Region's and/or local municipality's supply of large sized employment area sites (i.e. 10 ha or greater) which allow for a range of uses including but not limited to land extensive uses such as manufacturing, warehousing, distribution and logistics;*
9. *The conversion will not destabilize or adversely affect current or future viability and/or identity of the employment area with regards to:*
 - a) *Hindering the operation or expansion of existing or future businesses*
 - b) *Maintaining lands abutting or in proximity to the conversion site for employment purposes over the long term*
 - c) *Attracting a broad range of employment opportunities and maintaining clusters of business and economic activities*

- d) *Providing appropriate buffering of employment uses from non-employment uses;*
10. *The conversion to a non-employment use is compatible with the surrounding uses such as existing employment uses, residential or other sensitive land uses and will mitigate existing and/or potential land use conflicts;*
 11. *The site offers limited development potential for employment land uses due to factors including size, configuration, access and physical conditions;*
 12. *The proposed site is not adjacent to 400-series highways, or is not located in proximity to existing or planned highways and interchanges, intermodal facilities, airports and does not have access to rail corridors;*
 13. *The proposed conversion to a non-employment use does not compromise any other planning policy objectives of the Region or local municipality; and*
 14. *Cross-jurisdictional issues have been addressed.*

The current proposal for enhanced land use permissions applicable to the subject lands merits further review and should be considered under the current MCR process. The following is a preliminary response to the combined Growth Plan and York Region conversion criteria.

1. *There is a need for the conversion.*

This conversion will facilitate the future redevelopment of the subject lands for higher-density mixed-uses, representing a more efficient use of land and infrastructure as compared to the current underutilization of the subject lands. This will fulfill various provincial and regional planning policy objectives, while being complementary to the surrounding employment areas. The proposed conversion will also support the intensification and mixed-use objectives of the Primary Intensification Corridor (Steeles Avenue West). This conversion would retain existing employment and office uses, while also adding complimentary non-employment uses.

2. *The lands are not required over the horizon of this Plan for the employment purposes for which they are designated.*

The proposed conversion would allow for significant employment opportunities to be maintained on the subject lands, while also allowing for the introduction of other uses. Office, being a non-traditional and more sensitive form of employment, is compatible with proposed additional uses. Additionally, the existing development is old and undistinguished, thus requiring redevelopment to support the economic vitality of the intensification area. The expansion of uses on the site will promote the rejuvenation and redevelopment of the lands in a way that supports city, regional and provincial objectives.

3. *The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan.*

The current employment land conversion request contemplates the intensification of the site with a mixed of uses, which would include office, retail or other commercial uses to support the subject land's continued contribution to the forecasted employment growth.

4. *The proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in [the Growth Plan], as well as the other policies of this Plan.*

The proposed request is located along an intensification corridor, as designated by the City of Vaughan Official Plan. The proposed development would support surrounding uses by encouraging active transportation, providing nearby housing options for people that work in the employment area, and would result in increased population and employment densities to support the intent of the Primary Intensification Corridor.

5. *There are existing or planned infrastructure and public service facilities to accommodate the proposed uses.*

The lands are located along a Primary Intensification Corridor within the urban area where existing services, such as public transportation, water, and waste are existing and readily available. In addition, Steeles Avenue West is planned in the future to be serviced by the Toronto Transit Commission's "10-Minute or Better Network", "Blue Night" service, and an express bus route. Redevelopment in a compact and mixed use form will improve the efficiency of services and infrastructure.

6. *The following employment areas will not be considered for conversion as they have not yet had the opportunity to develop due to servicing constraints or have recently been brought into the urban boundary to accommodate employment land employment growth to 2031: Keswick Business Park, Queensville, Highway 404 (ROPA 1), ROPA 3, and Highway 400 North (ROPA 52).*

The subject lands are not located within the identified areas.

7. *The employment area will not be considered for conversion if the entire perimeter of the site is surrounded by lands designated for employment uses and is not viable to continue as an employment area.*

Although the subject lands are surrounded by employment lands, the existing uses surrounding the subject site are compatible with additional mixed-use permissions on the subject lands, and more sensitive land uses would not threaten the surrounding lands' viability to continue as an employment area.

8. *Conversion of the site would not compromise the Region's and/or local municipality's supply of large sized employment area sites (i.e. 10 ha or greater) which allow for a range uses including but not limited to land extensive uses such as manufacturing, warehousing, distribution and logistics.*

The total combined area of the subject lands is 4.36 ha, which is divided by Director Court (a public right-of-way), and therefore is not considered a large site, and is not viable for land extensive employment uses.

9. *The conversion will not destabilize or adversely affect current or future viability and/or identity of the employment area with regards to:*
- a) *Hindering the operation or expansion of existing or future businesses*
 - b) *Maintaining lands abutting or in proximity to the conversion site for employment purposes over the long term*
 - c) *Attracting a broad range of employment opportunities and maintaining clusters of business and economic activities*
 - d) *Providing appropriate buffering of employment uses from non-employment uses.*

The requested conversion of the subject lands to mixed-use would not hinder the operation, or expansion of existing or future businesses given the existing uses, as well as the small size-format of individual properties. In addition, there are no large, heavy industries (i.e. Class II or Class III) on or abutting the subject lands (that we are aware of). The subject lands are bordered by primarily commercial and office uses, which are compatible with the increased range of uses requested.

The lands are currently underutilized given their location along a Primary Intensification Corridor. With extended permissions, the lands could provide an appropriate transition from the employment uses to the south and east, and future residential uses to the west. A wide range of employment opportunities, including the existing office uses, could be supported within future development. The proposed conversion itself provides an appropriate transition to employment lands, while expanding mixed-use lands, and supporting nearby employment and commercial areas through allowing employees to live closer to their workplaces. This is supported by the Growth Plan's goals for complete communities, as well as York Region Official Plan Policy 5.2.5, which directs a balance of residential and employment uses, in order to support people living within proximity of where they work.

10. *The conversion to a non-employment use is compatible with the surrounding uses such as existing employment uses, residential or other sensitive land uses and will mitigate existing and/or potential land use conflicts.*

The proposed conversion is compatible with surrounding land as there is sufficient buffer distance between the subject lands and heavy industry and sensitive uses. The proposed uses provide an appropriate variety of land-uses to efficiently use the lands and support surrounding transportation infrastructure.

11. *The site offers limited development potential for employment land uses due to factors including size, configuration, access and physical conditions.*

The subject lands are located along a Primary Intensification Corridor. As such, traditional industrial employment uses are not appropriate on the site. Office employment uses are compatible with residential and other sensitive land uses. This type of development has occurred elsewhere in Vaughan at other key nodes.

12. *The proposed site is not adjacent to 400-series highways, or is not located in proximity to existing or planned highways and interchanges, intermodal facilities, airports and does not have access to rail corridors*

The subject lands are located near highway 400; however, they are not immediately adjacent. The employment uses on the site are proposed to be retained, and proximity to the highway will help to support the mixed use intensification of the lands.

13. *The proposed conversion to a non-employment use does not compromise any other planning policy objectives of the Region or local municipality.*

The proposed conversion is in our opinion, in keeping with the planning policy objectives of the York Region Official Plan, and satisfies the objectives and principles of the City of Vaughan Official Plan. The proposed mixed-use permissions would support the continued achievement of employment targets for the City, while providing additional uses along a Primary Intensification Corridor, within the existing built-up area, which is supportive of Provincial, Regional and City objectives to efficiently use lands with existing infrastructure and within proximity to existing public transportation services. The corridor is designated for intensification, mostly in the form of office uses, and a wider range of uses are compatible with office uses in comparison with traditional industrial employment use, which are not appropriate or viable for the site.

14. *Cross-jurisdictional issues have been addressed.*

The subject lands are located on Steeles Avenue West, on the north side of the street in the City of Vaughan. The adjacent lands on the south side of the street within the City of Toronto are also compatible with the proposed additional uses for the subject lands, and no cross-jurisdictional uses are anticipated.

Proposed Employment Conversion Request

Mixed office, commercial and residential uses for the site are compatible with the surrounding land uses. The future redevelopment of the subject lands with a mix of uses in compact, suitable densities will help to achieve the intensification goals of the City of Vaughan Official Plan, as well as the objectives for compact, mixed use communities outlined in the Provincial Policy Statement. Proposals like this which have occurred in Vaughan, which locate housing and jobs in close proximity reduce trip generation, and support balanced communities.

Conclusion

At this time, we respectfully request on behalf of our client that the subject lands be considered for employment conversion as part of the current MCR process.

In recognition of our recent engagement with the owners of these lands, it is our desire to have this request considered and we will be engaging further with City and Regional staff to discuss this further. We will also participate in upcoming open house public sessions as they are arranged by the Region.

We kindly request to meet with York Region and City of Vaughan Planning Staff and receive any future reports regarding the Regional Municipal Comprehensive Review and request to be notified of any decisions regarding this matter. We intend to monitor the York Region Official Plan Review process on an ongoing basis.

Thank you for the opportunity to provide these comments. Please contact the undersigned at extension 241, or Jacob Lapointe at extension 299 should you have any questions regarding this submission.

Yours truly,
Weston Consulting
Per:



Ryan Guetter, BES, MCIP, RPP
Senior Vice President

- c. Sorbara Group of Companies
Jason Schmidt-Shoukri, City of Vaughan
Fausto Filippetto, City of Vaughan
Bill Kiru, City of Vaughan
York Region Clerk



**WESTON
CONSULTING**

planning + urban design

Regional Municipality of York
17250 Yonge Street
Newmarket, ON
L3Y 4W5

March 12, 2020
File 9816

**Attn: Paul Freeman, Chief Planner
Region of York**

Dear Sir,

**RE: Region of York Municipal Comprehensive Review
Employment Lands Conversion Request
20 Graniteridge Road, 40 Graniteridge Road and 351 Caldari Road,
City of Vaughan**

Weston Consulting is the planning consultant for the Sorbara Group of Companies, the group which represents "*Realty Growth II INC.*," the registered owners of the properties municipally addressed as 40 Graniteridge Road, 20 Graniteridge Road; and, 351 Caldari Road, in the City of Vaughan (herein referred to as the "subject lands"). We have been engaged to provide assistance to Sorbara Group during York Region's Municipal Comprehensive Review ("MCR") process.

We recognize that this request is being provided after the region's previous deadlines imposed in the fall; however, we do not believe there to be a statutory deadline and we recognize that input from the Province is pending, which could impact overall land needs assessment considerations. We also recognize that interrelationships between those inputs and local municipal recommendation as well as the staff report recommendations of March 12 could impact further changes to the considerations of conversion requests, prior to decisions made by council.

Property Description and Surrounding Area

The subject lands consist of 3 separate parcels of land located south-west of the major intersection of Rutherford Road and Jane Street. The subject lands have frontage along Graniteridge Road and Caldari Road, and have a combined area of approximately 89,798m² (22.19 Acres, 8.98 Hectares).

The properties are all currently occupied by light industrial uses, as well as related office and accessory sales uses, with the exception of 20 Graniteridge, which is currently occupied by a small distribution centre.

The subject lands are designated "*General Employment*" by the City of Vaughan Official Plan, and are currently occupied by general employment uses. These lands are, however, in close proximity

to the “*Vaughan Mills Centre Secondary Plan Area*,” and its related planned residential and mixed-use intensification. There are also existing and proposed public transportation services nearby the subject lands.



Surrounding Land Uses

The following land uses are located adjacent to the subject lands:

- North: Directly north of the subject lands, within the “*General Employment and Prestige Employment*” designation, is a manufacturing plant. Within the “*High Rise – Mixed Use*” designation are vacant lands, and within the “*Oak-Ridges Moraine Natural Core*,” there is green space.
- South: Directly south of subject lands, is a municipal transit garage, a food processing plant, and numerous distribution, warehousing and manufacturing facilities.
- East: Directly east of the subject lands is the MacMillan Yard of the Canadian National Railway Company.
- West: To the immediate west of the property located in the “*Prestige Employment*” designation are small office buildings; Beyond this is the “*Vaughan Mills Centre Secondary Plan Area*” and Vaughan Mills Shopping Centre, which is planned for significant residential and commercial intensification.

Although currently designated for employment use, the subject lands are not considered a Core Employment Area within the context of the “*Strategic Employment Lands*” areas depicted in Figure 2 (York Region Strategic Employment Lands) of the York Region Official Plan.

The nearby *Vaughan Mills Secondary Plan Area* is an intensification area that is planned to accommodate a range of mixed uses, including major retail, office uses, and high-density residential uses. The secondary plan allows for heights of up to 25 storeys at the intersection of Jane Street and Rutherford Road, which is less than 400m from the subject lands, and up to 22 storeys on lands approximately 150m from the subject lands.

Provincially Significant Employment Zones

Weston Consulting acknowledges that the subject lands are located within the “*Provincially Significant Employment Zones*” in conjunction with A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (the “Growth Plan”).

Planning Context

The subject lands are located within a defined Employment Area and are designated ‘*General Employment*,’ under the City of Vaughan Official Plan.

Our client is currently considering mixed-use permissions for the subject lands, in keeping with the surrounding emerging planning context. This would still provide opportunities for a significant number of jobs on the subject lands through the mixed-use permissions, leading to a more efficient use of the lands without threatening the continued viability of the nearby employment uses to the south and east.

Employment Lands Conversion

The Region is undertaking a review of their Official Plan policies as part of the MCR process, including the employment policies. Staff are currently undertaking an analysis of the Region’s employment land needs to 2041, pending further input from the Province, and are addressing the need to identify and protect employment lands for the long term. As such, we request the consideration of the conversion of the subject lands to facilitate new mixed-uses..

The conversion of employment lands to non-employment uses may be permitted where it can be demonstrated that the conversion adequately addresses the five (5) criteria set out in Section 2.2.5.9 of the Growth Plan. In addition, York Region Council recently adopted 9 additional criteria under which employment conversion requests will be assessed. According to these combined criteria, the conversion of lands within employment areas to non-employment uses may be permitted where it is demonstrated that:

1. *There is a need for the conversion;*

2. *The lands are not required over the horizon of [the Growth Plan] for the employment purposes for which they are designated;*
3. *The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of [the Growth Plan];*
4. *The proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in [the Growth Plan], as well as the other policies of [the Growth Plan];*
5. *There are existing or planned infrastructure and public service facilities to accommodate the proposed uses;*
6. *The following employment areas will not be considered for conversion as they have not yet had the opportunity to develop due to servicing constraints or have recently been brought into the urban boundary to accommodate employment land employment growth to 2031: Keswick Business Park, Queensville, Highway 404 (ROPA 1), ROPA 3, and Highway 400 North (ROPA 52);*
7. *The employment area will not be considered for conversion if the entire perimeter of the site is surrounded by lands designated for employment uses and is not viable to continue as an employment area;*
8. *Conversion of the site would not compromise the Region's and/or local municipality's supply of large sized employment area sites (i.e. 10 ha or greater) which allow for a range of uses including but not limited to land extensive uses such as manufacturing, warehousing, distribution and logistics;*
9. *The conversion will not destabilize or adversely affect current or future viability and/or identity of the employment area with regards to:*
 - a) *Hindering the operation or expansion of existing or future businesses*
 - b) *Maintaining lands abutting or in proximity to the conversion site for employment purposes over the long term*
 - c) *Attracting a broad range of employment opportunities and maintaining clusters of business and economic activities*
 - d) *Providing appropriate buffering of employment uses from non-employment uses;*
10. *The conversion to a non-employment use is compatible with the surrounding uses such as existing employment uses, residential or other sensitive land uses and will mitigate existing and/or potential land use conflicts;*
11. *The site offers limited development potential for employment land uses due to factors including size, configuration, access and physical conditions;*
12. *The proposed site is not adjacent to 400-series highways, or is not located in proximity to existing or planned highways and interchanges, intermodal facilities, airports and does not have access to rail corridors;*
13. *The proposed conversion to a non-employment use does not compromise any other planning policy objectives of the Region or local municipality; and*
14. *Cross-jurisdictional issues have been addressed.*

The current proposal for enhanced land use permissions applicable to the subject lands merits further review and should be considered under the current MCR process. The following is a preliminary response to the combined Growth Plan and York Region conversion criteria.

1. *There is a need for the conversion.*

This conversion will facilitate the future redevelopment of the subject lands for higher-density mixed-uses, representing a more efficient use of land and infrastructure as compared to the current underutilization of the subject lands. This will fulfill various provincial and regional planning policy objectives, while being complementary to the surrounding employment, residential and mixed-use areas.

2. *The lands are not required over the horizon of this Plan for the employment purposes for which they are designated.*

The subject lands are currently used for traditional employment purposes; however, a conversion to mixed-use, along with the lots to the north and west, would allow for an increase in employment opportunities on the lands, making better use of existing and planned transportation infrastructure.

3. *The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan.*

The current employment land conversion request contemplates the intensification of the site with a mixed of uses, which could include office, retail or other commercial uses and could improve the subject land's contribution to the forecasted employment growth.

4. *The proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in [the Growth Plan], as well as the other policies of this Plan.*

The proposed request is located on the edge of an employment area, and is in close proximity to an intensification area. The proposed development would support surrounding uses and would assist in achieving the minimum intensification and density targets.

5. *There are existing or planned infrastructure and public service facilities to accommodate the proposed uses.*

The lands are located within the urban area where existing services, such as public transportation, water, and waste, are already existing and available. In addition,

the area is in close proximity to planned higher order transit, and will be served by Viva-Next bus rapid transit.

6. *The following employment areas will not be considered for conversion as they have not yet had the opportunity to develop due to servicing constraints or have recently been brought into the urban boundary to accommodate employment land employment growth to 2031: Keswick Business Park, Queensville, Highway 404 (ROPA 1), ROPA 3, and Highway 400 North (ROPA 52).*

The subject lands are not located within the identified areas.

7. *The employment area will not be considered for conversion if the entire perimeter of the site is surrounded by lands designated for employment uses and is not viable to continue as an employment area.*

The subject lands are within close proximity to the Vaughan Mills Secondary Plan Area, which includes high-density mixed uses, and there is only one property separating these lands from that secondary plan area, which could also be integrated into a master plan. As such, the proposed conversion will not create any disconnected lands in the existing employment area given the conversion proposed. This would be even further enforced if the adjacent lands abutting Jane Street were also considered for conversion, as has occurred north of the Subject Lands.

8. *Conversion of the site would not compromise the Region's and/or local municipality's supply of large sized employment area sites (i.e. 10 ha or greater) which allow for a range uses including but not limited to land extensive uses such as manufacturing, warehousing, distribution and logistics.*

The combined area of all parcels in the subject lands is only 8.98 ha, and therefore will not compromise the Region's or City's supply of large sized employment area sites.

9. *The conversion will not destabilize or adversely affect current or future viability and/or identity of the employment area with regards to:*
 - a) *Hindering the operation or expansion of existing or future businesses*
 - b) *Maintaining lands abutting or in proximity to the conversion site for employment purposes over the long term*
 - c) *Attracting a broad range of employment opportunities and maintaining clusters of business and economic activities*

- d) *Providing appropriate buffering of employment uses from non-employment uses.*

The requested conversion of the subject lands to mixed-use would not hinder the operation, or expansion of existing or future businesses given the existing uses, as well as the small size-format of individual properties. In addition, there are no large, heavy industries (i.e. Class II or Class III) on or abutting the subject lands. The subject lands are bordered by employment, and in close proximity to green space and mixed-uses.

The lands are currently underutilized given the emerging planning context in the area. With extended permissions, the lands could provide an appropriate transition from the employment uses to the south and east, and future residential uses to the west. A wide range of employment opportunities could be supported within future development. The proposed conversion itself provides an appropriate transition from employment lands to the adjacent developing high-density commercial and residential mixed-use area to the west, and the potential future subway, light rail, and bus rapid transit services.

10. *The conversion to a non-employment use is compatible with the surrounding uses such as existing employment uses, residential or other sensitive land uses and will mitigate existing and/or potential land use conflicts.*

The proposed conversion is compatible with surrounding land as they are located in an area that is surrounded by lighter, and quieter employment uses. The nearby Macmillan Rail Yard is in our opinion, far enough from the Subject Lands that mitigation measures could be taken to reduce any noise, dust or other impacts from the yard, but would be subject to further study.

11. *The site offers limited development potential for employment land uses due to factors including size, configuration, access and physical conditions.*

The subject lands are located within close proximity to planned residential and mixed use areas. As such, possible employment uses on the site will be limited by the incoming residential uses to the north. The proximity to residential makes these lands better suited to more compatible uses such as office and retail, which would allow for an increase in employment density, while providing a greater transition to the nearby residential areas.

12. *The proposed site is not adjacent to 400-series highways, or is not located in proximity to existing or planned highways and interchanges, intermodal facilities, airports and does not have access to rail corridors*

The subject lands are not adjacent to nearby highway 400, the closest interchange to which is at Rutherford Road, meaning the lands do not have direct access to the highway, and all traffic between the highway and these lands, including any transport truck traffic, will have to travel through the adjacent residential and commercial mixed-use area.

13. *The proposed conversion to a non-employment use does not compromise any other planning policy objectives of the Region or local municipality.*

The proposed conversion is in keeping with the planning policy objectives of the York Region Official Plan, and satisfies the objectives and principles of the City of Vaughan Official Plan. The proposed mixed-use permissions would support the continued achievement of employment targets for the City, while providing additional uses within existing built-up areas, which is supportive of Provincial, Regional and City objectives to efficiently use lands with existing infrastructure and within proximity to existing public transportation services. There would also be a greater transition between planned high-density residential uses to the west and employment uses to the east.

14. *Cross-jurisdictional issues have been addressed.*

The subject lands are located in the City of Vaughan, and there are no cross-jurisdictional issues associated with the conversion.

Proposed Employment Conversion Request

Enhanced mixed-use, commercial and employment permissions for the subject lands would allow for an appropriate transition to the employment uses to the north, from the residential uses to the east. The future redevelopment of the subject lands with a mix of uses in compact, suitable densities will also complement and support the nearby higher-density residential areas. The lands are in proximity to existing public transportation services and located nearby planned higher-order transit investments.

Conclusion

At this time, we respectfully request on behalf of our client that the subject lands be considered for employment conversion as part of the current MCR process.

In recognition of our recent engagement with the owners of these lands, it is our desire to have this request considered, and we will be engaging further with City and Regional staff to discuss this further. We will also participate in upcoming open house public sessions as they are arranged by the Region.

We kindly request to meet with York Region and City of Vaughan Planning Staff and receive any future reports regarding the Regional Municipal Comprehensive Review and request to be notified of any decisions regarding this matter. We intend to monitor the York Region Official Plan Review process on an ongoing basis.

Thank you for the opportunity to provide these comments. Please contact the undersigned at extension 249, or Jacob Lapointe at extension 299 should you have any questions regarding this submission.

Yours truly,
Weston Consulting
Per:



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