

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

June 3, 2025
File 3867

Attn: City of Vaughan Clerks Office

**RE: City of Vaughan Official Plan Review – May 2025 Draft
H&L Title Inc. and Ledbury Investments Ltd.
9081 Weston Road (South of Rutherford Road and east of Weston Road)**

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the “Owner”), the owners of the lands municipally known as 9081 Weston Road in the City of Vaughan (the “Site”). We are monitoring the City of Vaughan’s Official Plan Review process on behalf of the Owner and previously submitted written correspondence on the Draft Vaughan Official Plan 2025 (the “Draft VOP”) in a letter dated March 14, 2025 (Attachment 1). The purpose of this letter is to provide additional comments on the version of the Draft VOP released in May 2025 in advance of the Statutory Public Meeting on June 4, 2025.

City of Vaughan Official Plan Review

Land Use Designation and Urban Structure

As outlined in our March 2025 letter, the Site is located within the Vaughan Mills Centre Secondary Plan (VMCSP) area, which proposes to designate the Site *Prestige Office Employment* and *Prestige Employment*. Although the VMCSP is subject to appeals at the Ontario Land Tribunal (OLT) for the lands west of Highway 400, it seeks to create a complete and well-integrated mixed-use urban centre that promotes connectivity throughout the area, including across Highway 400. This is further supported by the future Bass Pro Mills Drive extension located immediately south of the Site. As detailed in our March 2025 letter, it is our opinion that the *Prestige Office Employment* and *Prestige Employment* designations are not appropriate in the context of current provincial policy, which does not generally permit office or retail uses to be located in Employment Areas. Our March 2025 letter requested that Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed Use* and *High Rise Mixed Use* to provide appropriate transition between the residential neighbourhood to the west and the Vaughan Mills Shopping Centre to create a more integrated complete community with residential and non-residential densities. We note that Schedule 13 has not been updated in relation to the Site and request that Council direct Staff to revise Schedule 13 to appropriate mixed use designations, as noted above.

Urban Structure

As detailed in our March 2025 letter, Schedule 1 of the Draft VOP provided *Core Employment Areas* and *Supporting Employment Areas* categories, and the Site was proposed to be located within the *Core Employment Areas* category. We note the revised Draft VOP removes the *Core Employment Areas* and *Supporting Employment Areas* categories and consolidates them into a single *Employment Areas* category of the Urban Structure. The revised Draft VOP continues to locate the Site within the *Employment Areas* and adjacent to a *Primary Centre* despite our March 2025 letter requesting the Site be removed from the *Employment Areas*.

Employment Areas are intended to be reserved for industrial, manufacturing, warehouse and related uses, including research and development and ancillary retail and office uses. Limiting the permitted uses primarily to

industrial, manufacturing and warehousing will impede development of the Site due to its location between an established residential neighbourhood and the Vaughan Mills Shopping Centre. We request Council direct Staff to revise Schedule 1 to remove the *Employment Areas* category and extend the *Primary Centre Strategic Growth Area* over the Site.

Employment Area Conversion Policies

Policy 2.2.4.4 and Policy 2.2.4.5 of the revised Draft VOP establish criteria for the conversion of lands in *Employment Areas* to uses other than manufacturing, warehouse, or ancillary uses directly related to a manufacturing or warehouse use. We have reviewed these policies and note that additional considerations are provided in the Draft VOP than those found in the *Provincial Planning Statement 2024* (PPS 2024). For example, the criteria in the Draft VOP requires that an *Employment Areas* conversion request demonstrate it will not impact the configuration of the *Employment Area*. They also require the request to demonstrate it will not impact the City's ability to provide a variety of land types and sizes in the *Employment Area*. They also require demonstration that the land to be converted is not required for *Employment Area* uses beyond 2051, which is beyond the proposed horizon of the Plan. In our opinion, the criteria for the conversion of lands in *Employment Areas* should be consistent with the PPS 2024 to provide clarity and consistency in the application of planning policies. We request that Council direct Staff to revise Policies 2.2.4.4 and 2.2.4.5 to be consistent with the PPS 2024.

Natural Heritage Framework

Our March 2025 letter requested that Schedule 2 be revised to remove the *Enhancement Area* identified on the Site as it does not reflect the existing condition. The revised Draft VOP continues to show the natural feature on Schedule 2; however, we note it has been relabeled as an area "*To be Determined Through Future Studies*". We understand these are areas with potential to contribute to the Natural Heritage Network subject to further study. Policy 2.7.3.17 of the Draft VOP states that,

"Enhancement Areas are undeveloped lands identified conceptually on Schedule 2 as 'To be Determined through Future Studies' and are important components of the Natural Heritage Network."

Policy 2.7.3.18 states that,

"Enhancement Areas are not existing known Core Features, but have been identified as potential Core Features that require further study if proposed for Development or Site Alteration."

Policy 2.7.3.1.9 states that,

"Enhancement Areas shown on Schedule 2 are approximate and the final location and boundary of the Enhancement Area shall be based on a natural heritage evaluation or Environmental Impact Study completed as part of the Development process."

While we generally support the intent of these policies to determine the refinement of *Core Features* based on the findings of technical studies, we request the Draft VOP be further revised to clarify that an Official Plan Amendment would not be required if an Environment Impact Study determines the feature is not significant. That said, as outlined in our March 2025 letter, we continue to be of the opinion that Schedule 2 of the Draft VOP does not accurately reflect the existing condition and request Council direct Staff to revise Schedule 2 accordingly.

Road Classification

Our March 2025 letter requested the proposed road network on Schedules 9A, 9B and 9C of the Draft VOP be removed and we note the revised Draft VOP continues to show a proposed road network on these schedules. It continues to be our opinion that including a conceptual road network in the Draft VOP may create limitations for

future development applications and the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application, with the exception of the extension of Bass Pro Mills Drive. We request Council direct Staff to revise these Schedules to remove the conceptual road network.

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 of any future updates as well as any discussion pertaining to the applicable designations, overlays, and policies which have effect on the Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at extension 241 or Darrin Cohen at extension 329.

Yours truly,

Weston Consulting

Per:



Ryan Guetter, BES, MCIP, RPP
President



Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, March 14, 2025

- c. H&L Title Inc. and Ledbury Investments Ltd.
Mark Flowers, Davies Howe LLP
Fausto Filipetto, Project Manager, City of Vaughan

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

March 14, 2025
File 3867

Attn: Fausto Filipetto, Project Manager

**RE: Comments on the Draft Vaughan Official Plan 2025
9081 Weston Road**

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the “Owner”), the owners of the lands municipally known as 9081 Weston Road (the “Site”). We are monitoring the City of Vaughan’s Official Plan Review process on behalf of the Owner and are pleased to provide the following comments on the Draft Vaughan Official Plan 2025 (the “Draft VOP”) as it relates to the Site. We previously submitted written correspondence on the Official Plan Review in a letter dated October 3, 2023 (attached).

Site Context

The Site is part of a broader development block that is located on the east side of Weston Road, south of Rutherford Road, west of Highway 400 and north of the proposed Bass Pro Mills Drive extension (Figure 1).

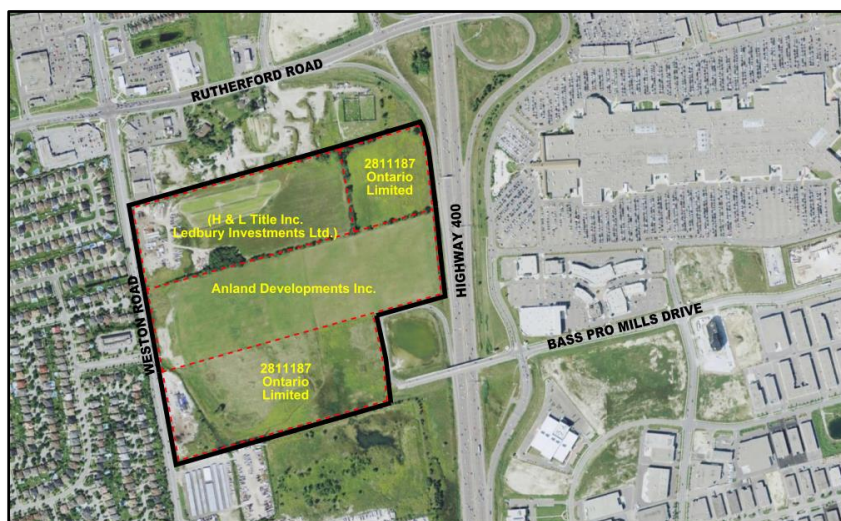


Figure 1: Map of Development Block of Landowners

In 2012 and 2014, landowners within the development block, including the Owner, appealed the 2010 Vaughan Official Plan (VOP 2010) and the Vaughan Mills Centre Secondary Plan (VMCSP), seeking to introduce non-employment use permissions on the western portion of the development block. As part of those appeals, the Owner sought to redesignate the Site within a *Primary Centre* and apply a mixed-use designation to permit residential uses with a range of heights and densities. Phase 1 of the Ontario Land Tribunal (OLT) hearing took place in 2021 to determine the general land use designations and Phase 2, which is pending, will determine the appropriate policies for the specific land use designations. The OLT issued an interim decision on Phase 1 of the hearing in 2021, and did not grant the proposed redesignation for mixed-use development, but determined that the City’s employment projection for the lands west of Highway 400 was too aggressive and not achievable.

Since the time of that interim decision, there have been significant legislative and policy changes regarding employment areas, as reflected in amendments to the *Planning Act*, a new Provincial Planning Statement and the elimination of the Growth Plan for the Greater Golden Horseshoe, all of which occurred in October 2024.

The VOP 2010 identifies the Site within an *Employment Areas* and within the *Natural Areas and Countryside* according to Schedule 1 (Urban Structure). The Site is also located within the Vaughan Mills Centre Secondary Plan area.

City of Vaughan Official Plan Review

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

Land Use Designation and Urban Structure

Schedule 13 (Land Use Designations) of the Draft VOP identifies the Site within the Vaughan Mills Centre Secondary Plan (VMCSP). The VMCSP designates the Site *Prestige Office Employment* and *Prestige Employment*, although those designations are subject to appeals that remain before the OLT. In our opinion, *High Rise Mixed Use* and *Mid-Rise Mixed Use* designations are appropriate for the Site and should be depicted as such on Schedule 13 of the Draft VOP and within the VMCSP. According to Section 4.2.2 of the Draft VOP, the mixed use designations “are primarily intended to support the evolution of Strategic Growth Areas into vibrant Complete Communities, with a range of housing and employment options, and services such as food stores, pharmacies, financial institutions, and restaurants within walking distance of residents.” The mixed-use designations permit both residential and non-residential uses on the same lot.

Based on the context of the Site between a residential neighbourhood and the Vaughan Mills Shopping Centre, the *Mid-Rise Mixed Use* and *High Rise Mixed Use* designations are appropriate and support the intent of Section 4.2.2. The introduction of the *Mid-Rise Mixed-Use* designation along Weston Road and *High Rise Mixed-Use* designation on the balance of the Site will provide appropriate transition between these two areas and create a more integrated complete community with residential and non-residential densities. By integrating new housing and job opportunities in proximity, it encourages the use of alternate forms of transportation and reduces the number and length of individual automobile trips which supports one of the policy objectives of the Draft VOP for Mixed Use areas.

It is our opinion that the land use designation identified in the VMCSP is not appropriate in the context of the provincial policy direction, which does not permit office or retail use to be located in Employment Areas. According to the new definition of “area of employment” established in Section 1 of the *Planning Act*, as of October 2024, stand alone commercial uses, including retail and office uses that are not associated with manufacturing or warehousing uses, are not permitted in areas of employment. The VMCSP identifies the entirety of the Vaughan Mills Centre as being a Priority Area for intensification and envisions intensification and redevelopment throughout all areas of the secondary plan area. Additionally, the VMCSP seeks to create a complete and well-integrated mixed-use urban centre that promotes connectivity throughout the area, including across Highway 400 which is further supported by the future Bass Pro Mills Drive extension. The *High Rise Mixed Use* and *Mid Rise Mixed Use* designations for the Site will support the goal of the VMCSP and should be reflected on Schedule 13 of the Draft VOP. Accordingly, we request Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed Use* and *High Rise Mixed Use*.

Urban Structure

The Draft VOP identifies two categories for Employment Areas: *Core Employment Areas*, which are areas that meet the amended definition of “area of employment” in Section 1 of the *Planning Act*, and *Supporting Employment Areas*, which do not meet the definition of “area of employment” and permit a broader range of uses including standalone office and retail uses. The Site is located within a *Core Employment Area* according to draft Schedule 1 (Urban Structure), with lands designated *Supporting Employment Areas* to the east and south of the Site within the balance of the development block.

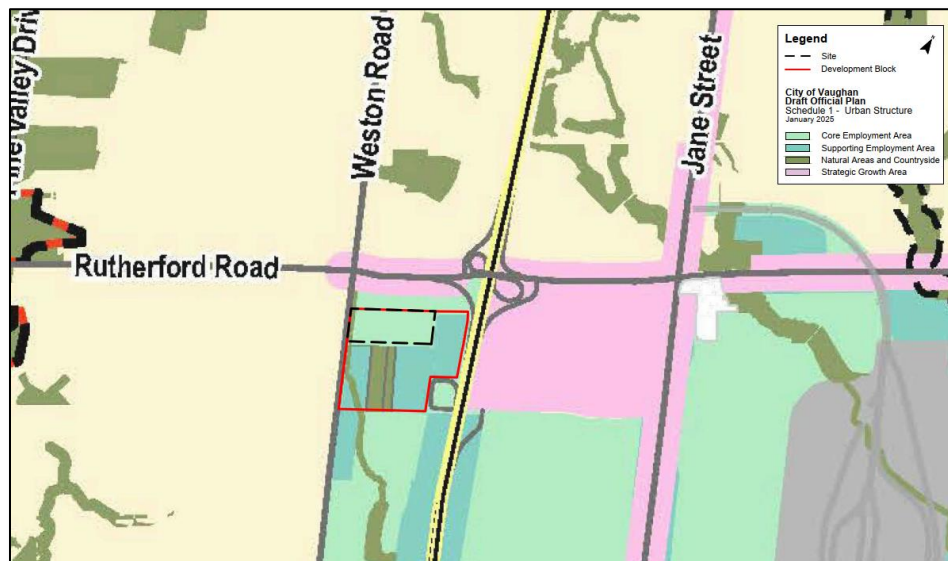


Figure 2: Schedule 1 of the Draft VOP: Urban Structure

The Draft VOP also establishes a hierarchy of Strategic Growth Areas, which include *Primary Centres* and *Primary Intensification Corridors*. Draft Schedule 1A identifies the southern portion of Rutherford Road as a *Primary Intensification Corridor within Employment Areas* and the northern portion of Rutherford Road as a *Primary Intensification Corridor*. The lands east of the Site, across Highway 400, are identified as a *Primary Centre*. Policy 2.2.1.1 describes these Strategic Growth Areas:

- ii. *Primary Centres are locations of Intensification accommodated in the form of predominantly mixed-use high- and mid-rise buildings, developed at an intensity that is supportive of transit;*
- vi. *Primary Intensification Corridors link together the various centres on transit supportive corridors and will be places to accommodate Intensification in the form of mixed-use Mid-Rise Buildings, limited mixed-use High-Rise Buildings and Low-Rise Buildings;*



Figure 3: Schedule 1A of the Draft VOP: Strategic Growth Areas

In our opinion, the *Core Employment Area* category is not appropriate for the Site as it represents a transitional area between an established residential neighbourhood and the Vaughan Mills Shopping Centre. Lands within the *Core Employment Area* are reserved for industrial, manufacturing, warehouse and related uses, including research and development and ancillary retail and office uses. Stand alone commercial uses, including retail and office uses that are not associated with manufacturing or warehousing uses, are not permitted in areas of employment. Limiting the permitted uses primarily to industrial, manufacturing and warehousing will impede development of the Site due to its location between a *Primary Centre* to the east and an established residential neighbourhood to the west. As discussed above, the Site should be redesignated *Mid Rise Mixed Use* and *High Rise Mixed Use* to support an appropriate development pattern that will create an integrated and complete community.

As such, we request the *Primary Centre* Strategic Growth Area be extended to the Site. It should be noted that the Site and broader Development Block have remained largely vacant for several years despite historically being designated for employment uses.

Policy 2.2.2.4 of the Draft VOP states that *Primary Centres* shall be planned to:

- Develop with a mix of housing types and tenures, including housing suitable for seniors and families with children and Affordable Housing and Attainable Housing
- include a mix of non-residential uses, including Retail, office, institutional, Community Facilities, and Human Services intended to serve both the local population and the City as a whole, and attract activity throughout the day;
- develop at densities supportive of planned public transit;
- have a fine grain multimodal transportation network suitable for pedestrians and cyclists, with appropriate internal links and links to the surrounding Community Areas which may take the form of sidewalks and/or Greenways;
- include an appropriate amount of well-designed public open spaces appropriate to the local context, including City-owned parks;

- f. encourage a pedestrian-friendly built form by locating active uses at grade; and
- g. be designed and developed to implement appropriate transition of intensity and use to surrounding Community Areas, and/or compatibility with adjacent Employment Areas

Furthermore, we note that the Site is not located in proximity to major Rail Facilities, which is described as an important feature of *Core Employment Areas* within the Draft VOP. According to Section 2.2.4,

Core Employment Areas also include the City's major Rail Facilities, identified on Schedule 1. Rail-related policies are included in Section 3.9. Close proximity to highway access and providing appropriate frontage for these facilities is important.

It should be noted that we are coordinating with the adjacent landowners to prepare a concept that will demonstrate how mixed-use development can support residential and non-residential growth within the development block between Weston Road and Highway 400 as part of a complete community.

Natural Heritage Framework

According to Schedule 2 of the Draft VOP, an *Enhancement Area* is identified on the Site (Figure 4). According to Policy 3.6.3.16, *Enhancement Areas are undeveloped lands identified conceptually on Schedule 2 and are important components of the Natural Heritage Network because they have the potential to:*

- a. enhance form and function of watercourses;
- b. maintain and/or enhance water flow;
- c. improve Wildlife Habitat value;
- d. improve species movement and/or dispersal;
- e. provide restoration options;
- f. improve overall connectivity value; and/or
- g. improve the likelihood of maintaining self-sustaining vegetation.

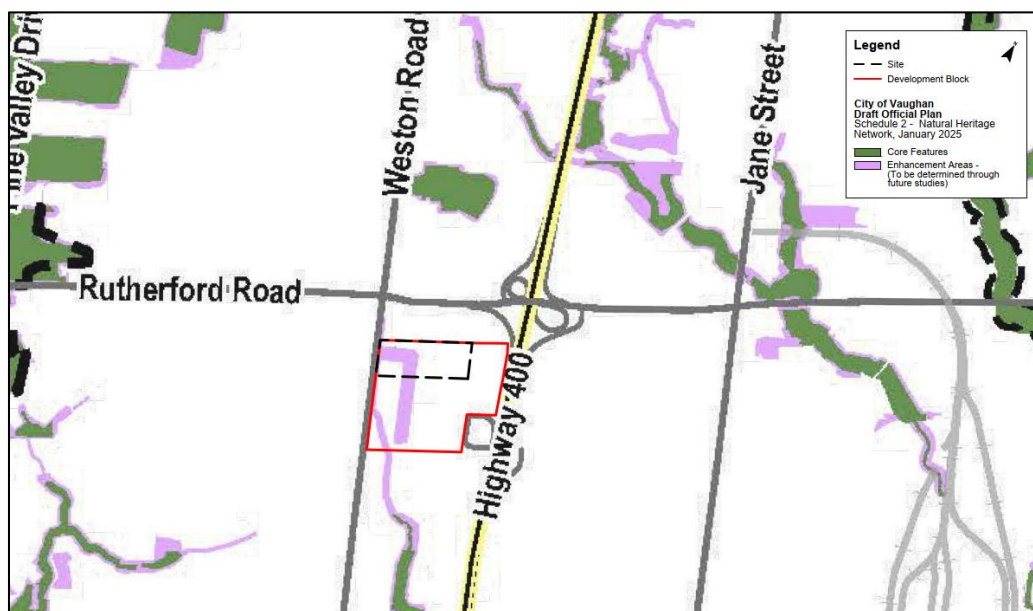


Figure 4: Draft Schedule 2 of the Draft VOP: Natural Heritage Network

Policy 3.6.3.17 states that,

Enhancement Areas shown on Schedule 2 are approximate and the final location and boundary of the Enhancement Area will be based on a natural heritage evaluation or Environmental Impact Study completed as part of the Development process.

Furthermore, Policy 3.6.3.20 states that,

Enhancement Areas as determined by policy 3.6.3.17 above will be incorporated into the Natural Heritage Network as Core Features and/or open space designations and conveyed to the City as a condition of Development approval. Such changes do not require amendment to this Plan.

We support the intent of these policies to allow for the refinement of *Enhancement Areas* based on the findings of an Environmental Impact Study (EIS) without an Official Plan Amendment. However, it should be noted that the *Enhancement Area* depicted on Schedule 2 of the Draft VOP does not accurately reflect the existing conditions on the Site. A portion of Black Creek currently traverses north-south along the westerly boundary of the Site. Schedule 2 should be revised to remove the *Enhancement Area* depicted as does not reflect the existing condition on the Site. It is noted that the VMSCP contemplates the realignment of Black Creek; however this will be addressed through a formal development application review process.

Road Classifications

According to Schedules 9A, 9B and 9C of the Draft VOP, a proposed road network is identified on the Site consisting of two north-south Minor Collector Streets and one east-west Local Street. In our opinion, including the proposed conceptual street network through the Site is inappropriate. Including a conceptual road network in the Draft VOP may create limitations for future development applications. With the exception of the extension of Bass Pro Mills Drive, the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application. We request the road network on Schedules 9A, 9B and 9C of the Draft VOP be removed.

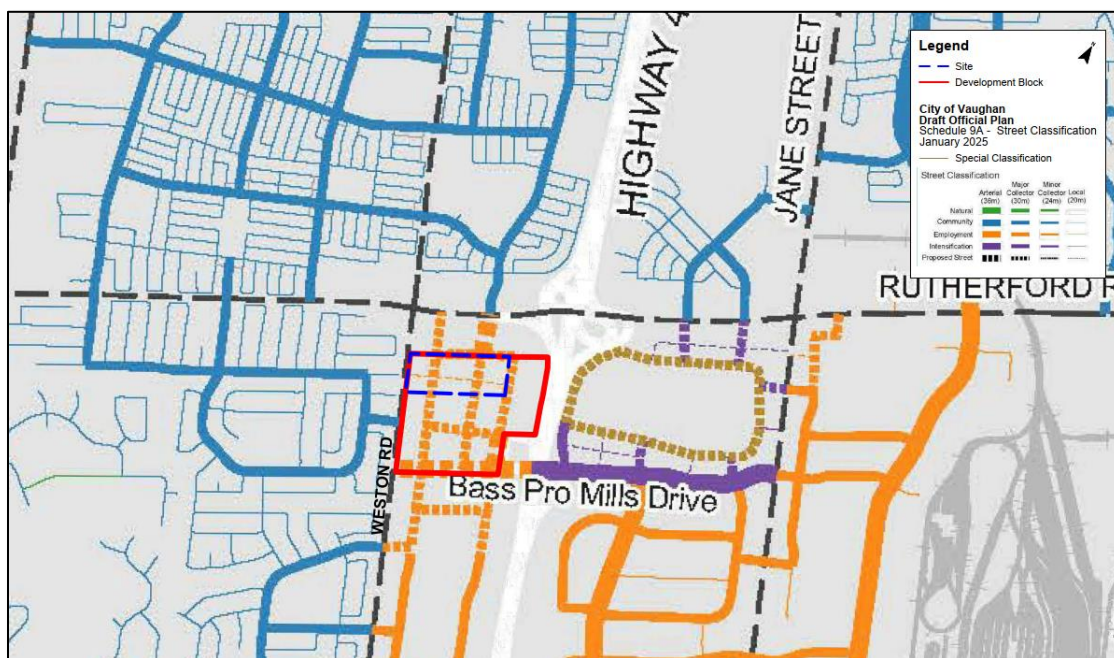


Figure 5: Draft Schedule 9A of the Draft VOP: Street Classification



Figure 6: Draft Schedule 9B: Street Types

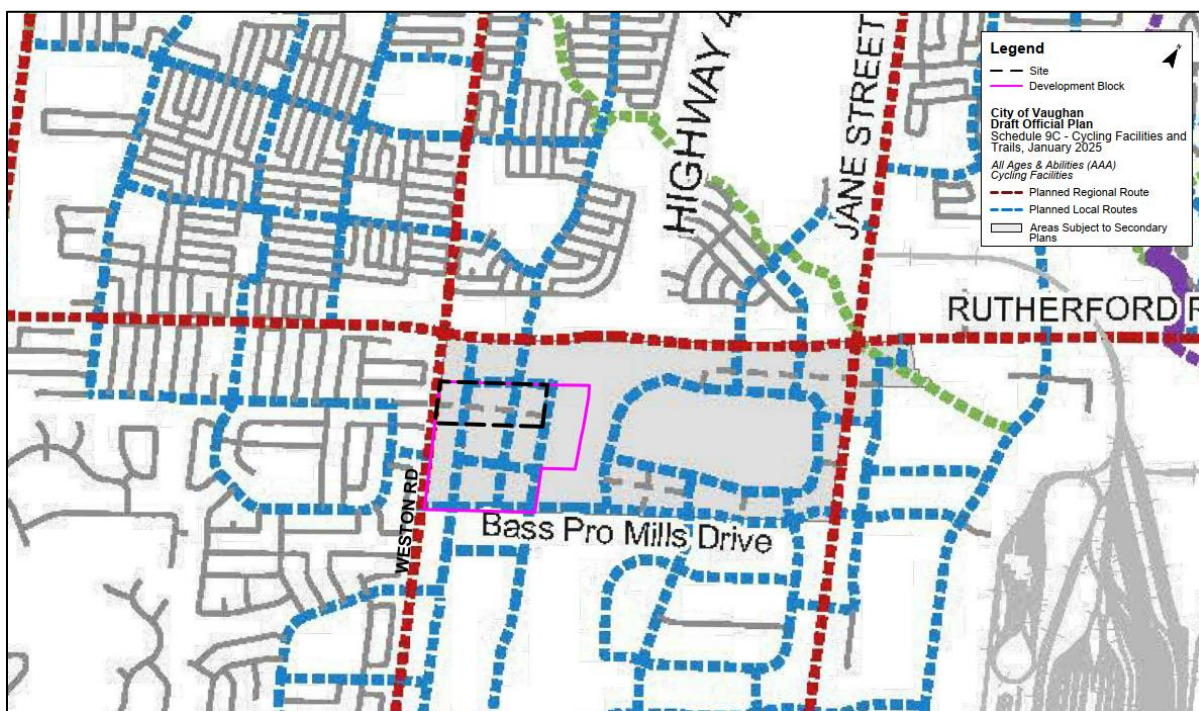


Figure 7: Draft Schedule 9C: Cycling Facilities and Trails

Transition

Section 1.4.2 of the Draft VOP provides transition policies that will repeal VOP 2010 subject to the criteria of Policy 1.4.2.1 to Policy 1.4.2.2. Applications in process will also be subject to transition policies established in the Draft VOP. We note that certain matters of VOP 2010 for the lands west of Highway 400, including the Site, have been appealed to the OLT and are yet to be disposed of fully.

Section 1.4.2.1 of the Draft VOP provides transition policies for the repeal of VOP 2010. According to Policy 1.4.2.1(b),

Volume 2 of VOP 2010 remains in force for the lands shown on Schedule 14A – Areas Subject to Secondary Plans, Schedule 14B – Areas Subject to Area Specific Plans and Schedule 14C – Areas Subject to Site Specific Plans, in Volume 1 of VOP 2010, save and except for the following secondary plan areas:

- i. *The “Weston Road and Highway 7” area shown on Schedule 14A; and*
- ii. *The “Vaughan Metropolitan Centre” area shown on Schedule 14A.*

It is our understanding that the policies and schedules of the VMCSPP will continue to apply to the Site; however, these policies and schedules, as they relate to the lands west of Highway 400, are under appeal to the OLT. Based on the analysis provided in this letter, it is our opinion that *Mid-Rise Mixed Use* and *High-Rise Mixed-Use* designations are appropriate for the Site and should be depicted on Schedule 13 (Land Use) of the Draft VOP. The extension of the *Primary Centre* Strategic Growth Area category to include the Site supports this objective.

Conclusion

In summary, we are pleased to provide the following requests:

- Revised Schedule 13 of the Draft VOP to designate the Site *Mid Rise Mixed Use* along Weston Road and *High Rise Mixed Use* for the balance of the Site.
- Revise Schedule 1 of the Draft VOP to remove the *Core Employment Area* and apply the *Strategic Growth Area* to the Site.
- Revise Schedule 1A to extend the *Primary Centre* category to the Site to permit a mix of uses in support of a complete community.
- Revise Schedules 9A, 9B and 9C to remove the conceptual road pattern.
- Revise Schedule 2 to remove the *Enhancement Areas* on the Site.

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 Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at ext. 241, Darrin Cohen at extension 329, or James Todd at extension 345.

Yours truly,

Weston Consulting

Per:



Ryan Guetter, BES, MCIP, RPP
President



Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, October 3, 2023

- c. H&L Title Inc. and Ledbury Investments Ltd.
Mark Flowers, Davies Howe LLP

City Council
City of Vaughan
2141 Major Mackenzie Drive West
Vaughan, ON, L6A 1P7

October 3, 2023
File 3867

RE: City of Vaughan Official Plan Review
H&L Title Inc. and Ledbury Investments Ltd.
South of Rutherford Road and east of Weston Road

Weston Consulting is the planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (collectively, the “Owners”), the owners of the lands consisting of approximately 10.1 hectares located south of Rutherford Road and east of Weston Road, in the City of Vaughan (the “subject lands”). The subject lands are located in the southeastern quadrant of the Weston Road and Rutherford Road intersection in the City of Vaughan and are situated west of Highway 400. The purpose of this letter is to provide formal comments on the City of Vaughan’s Official Plan Review and the draft materials that have been released for review and comment. As additional draft materials are released, we may provide further comments.

On November 4, 2022, the Ministry of Municipal Affairs and Housing modified and approved the new York Region Official Plan. The nature of the modifications included redesignating certain lands throughout the Region. As per the Minister’s direction, the lands adjacent to the subject lands to the east and south were redesignated from an *Employment Area* designation to *Community Area*, as per Map 1A, Land Use Designations (see Figure 1 below). The subject lands were not redesignated by the Minister’s decision and maintained an *Employment Area* designation.

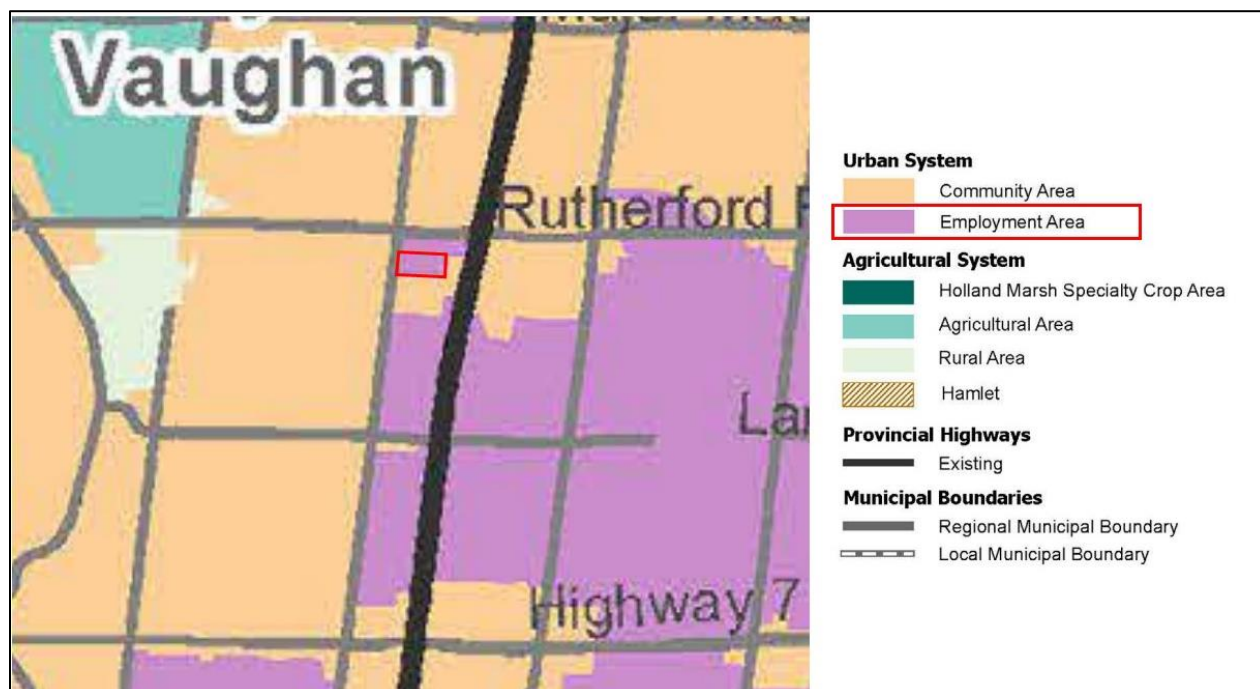


Figure 1: York Region Official Plan, Map 1A, Land Use Designations

Based on draft Schedule 1, Urban Structure of the City of Vaughan Official Plan, the land use designations of the subject lands are identified as *Employment Area*, whereas the adjacent lands are not consistent with the Minister's land use modifications to the York Region Official Plan on November 4, 2022. Notably, in the south east quadrant of Weston Road and Rutherford Road, the *Community Area* designation as per draft City of Vaughan Official Plan Schedule 1 is not consistent with the *Community Area* designation per York Region's Map 1A, Land Use Designations, with the City's draft Schedule 1 identifying lands immediately south of the subject lands as *Employment Area* whereas these lands are designated as *Community Area* in the York Region Official Plan (see Figure 2 below).

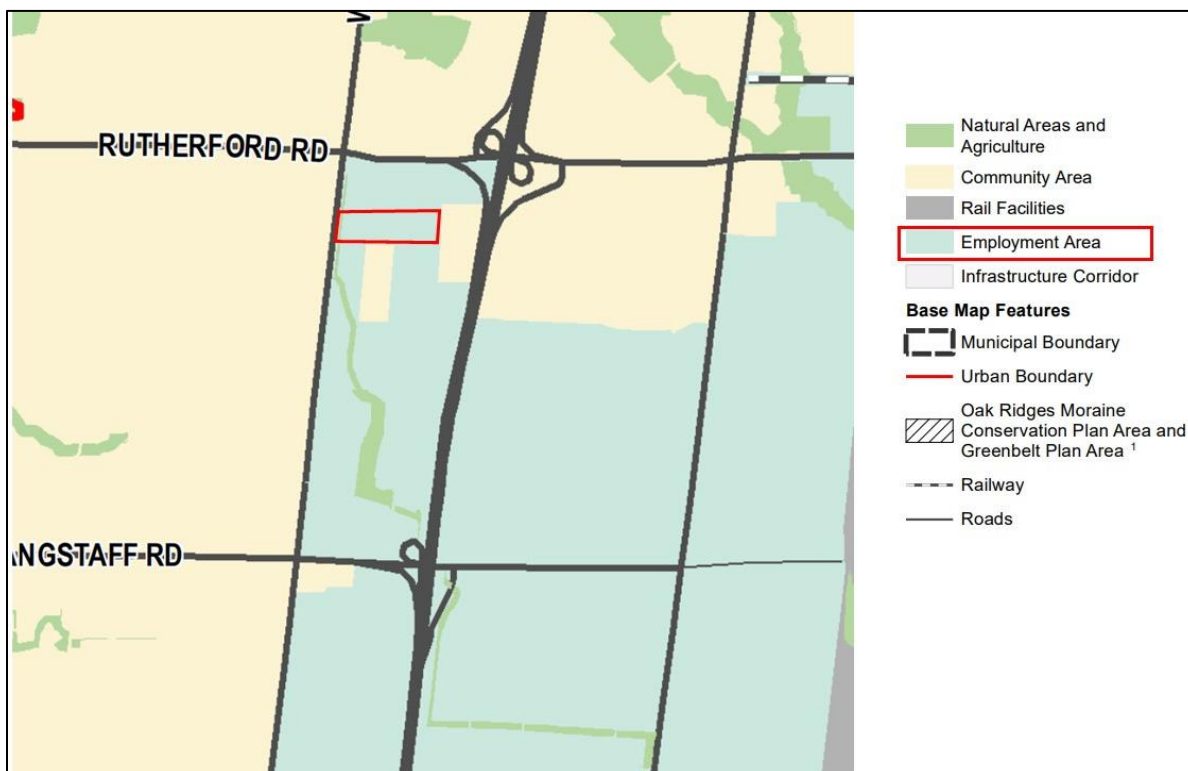
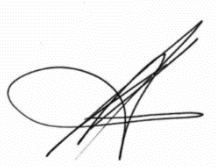


Figure 2: Draft City of Vaughan Official Plan, Schedule 1, Urban Structure

As a result of the inconsistency between the approved York Region Official Plan Map 1A and draft City of Vaughan Official Plan Schedule 1, the Owners request that the City revise the land use designation on Schedule 1, Urban Structure to ensure consistency with the Minister's decision on November 4, 2022. Further, we recommend that the City take steps to incorporate the subject lands as part of the *Community Area* in order to provide greater continuity of the land use designation and ultimately avoid orphaned *Employment Area* parcels in the City. The redesignation of the lands to *Community Area* would allow for greater continuity of lands with residential permissions situated to the south, east and west of the subject lands, and would be compatible with the lands to the north that are currently designated in the City of Vaughan Official Plan predominately for commercial uses (e.g. office, retail, hotel, etc.).

Thank you for the opportunity to provide comments on the City's draft Official Plan. We reserve the right to provide additional comments in the future. Please do not hesitate to contact the undersigned should you have any questions.

Yours truly,
Weston Consulting
Per:



Ryan Guetter, BES, MCIP, RPP
Executive Vice President

c. Mark Flowers, Davies Howe LLP
Stephen, Elliott & Gary Title