

C16

Communication

Council – June 24, 2025

CW(PM) – Report No. 24 Item No. 10

June 4, 2025

BY EMAIL: clerks@vaughan.ca **and** oprmanager@vaughan.ca **& BY REGULAR MAIL**

Vaughan City Hall, Level 100

2141 Major Mackenzie Dr.

Vaughan, ON

L6A 1T1

Attn: Mayor S. Del Duca & Members of the Committee of the Whole

RE: Committee of the Whole Agenda June 4, 2025 – Item 10

New Vaughan Official Plan – May 2025 (File PL 9023 11)

Westlake - Royal Building Products at 71 and 91 Royal Group Crescent Properties

City of Vaughan, Region of York

Our File: 1711-25

As planners of record, we write on behalf of Westlake Canada Inc., dba Royal Building Products ('Westlake'). We appreciate the opportunity to provide stakeholder input to the new Vaughan Official Plan 2025 ('VOP 2025') program further to our earlier April 25, 2025 letter submission (attached as Appendix 1 to this letter) regarding Vaughan's proposed new Official Plan.

As noted, the VOP process is now recently elevated to a proposed new Official Plan (May 2025 version) under Section 17 of the *Planning Act*.

- Westlake is a well-established manufacturing business located at 71 and 91 Royal Group Crescent. Please refer to attached Aerial Image;
- As a significant industrial stakeholder, Westlake has, and continues to participate regularly in the city's planning programs in order to maintain the implementation of land use planning policies that are conducive to their manufacturing operations;
- 'Westlake' continues to manufacture and distribute a wide variety of building products that are essential to servicing the residential & ICI building products market in the city, the region and in Canada. In fact, Westlake's industrial products broadly support region-wide housing and related construction activities;



- Westlake has plans to expand and grow its robust operations at this location in keeping with a thirty-five-year history of manufacturing, warehousing and distributing building products, and;
- Westlake, with its significant work force, serves the regional market from this convenient and highway and transit accessible location within the city.

Please consider our April 25, 2025 letter submission as formal input to the June 4, 2025 Statutory Public Meeting regarding VOP 2025 (May 2025 version).

Proposed Modifications to Draft VOP 2025

Public planning policies and regulations reinforce the protection and long-term viability of existing and planned industrial, manufacturing, warehousing and distribution uses, and related uses within established 'Employment Areas'.

While the proposed VOP 2025 policies and schedules set out to present provincial 'Employment Areas' goals and objectives, we request certain modifications to improve consistency with the *Planning Act* and conformity with the PPS 2024.

Proposed Modification No. 1: It is recommended that the following underlined text from policy 1.4.1.8 be deleted to support employment area planned function, scale and context.

"...the use abutting an arterial street or Provincial highway shall be interpreted to extend one lot depth in from the arterial street or Provincial highway. In all other instances..."

Proposed Modification No. 2: To protect employment areas by ensuring planned functions may be fulfilled per provincial planning policies, it is recommended that the employment areas be more carefully reviewed to be consistent and fully and appropriately designated as 'Core Employment Areas' and 'General Employment' per the final VOP 2025, as appropriate.

Proposed Modification No. 3: It is recommended that VOP 2025 policies achieve and manage urban design goals and objectives for employment areas through specific VOP 2025 policies, rather than by applying employment area land use designations to this effect, so to avoid inhibiting 'Core Employment Area' planned functions.



This submission does not preclude additional comments in due course regarding proposed new VOP 2025. Please ensure our firm remains on the City's mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related items, and any Council decision or actions regarding the above captioned proposed VOP 2025.

Thank-you in advance for your co-operation.

Yours truly,
Pound & Stewart Associates Limited



Philip Stewart MCIP, RPP

/la 1711_VOP 2025_Westlake_71 and 91 Royal Group Cres._June.04.2025

Attached Appendix 1 – April 25, 2025 letter submission

cc. Ward 2 Councillor A. Volpentesta, Adriano.Volpentesta@vaughan.ca

cc. Ms. L. Cardile, Ward 2, Executive Assistant, Lucy.Cardile@vaughan.ca

cc. Mr. V. Musacchio, Interim Deputy City Manager, Planning & Growth Management & Housing Delivery, City of Vaughan vince.musacchio@vaughan.ca

cc. Ms. N. Tuckett, MCIP, RPP, Director of Development and Parks Planning, City of Vaughan nancy.tuckett@vaughan.ca

cc. Mr. F. Filipetto, MCIP, RPP, Project Manager, Policy Planning, City of Vaughan Fausto.Filipetto@vaughan.ca

cc. Ms. C. Murphy, MCIP, RPP, Policy Planning, City of Vaughan Carly.Murphy@vaughan.ca

cc. Mr. M. Antoine, Sr. Manager of Development Planning, MCIP, RPP, City of Vaughan mark.antoine@vaughan.ca

cc. Messrs. D. Tang & R. Gray, Miller Thomson LLP

cc. client

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PLANNING CONSULTANTS • CITYPLAN.COM

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April 25, 2025

BY EMAIL: oprmanager@vaughan.ca **& BY REGULAR MAIL**

Vaughan City Hall, Level 200
2141 Major Mackenzie Dr.
Vaughan, ON
L6A 1T1

Attn: Mr. Fausto Filipetto, MCIP, RPP, Project Manager, Policy Planning

RE: Final Draft Vaughan Official Plan 2025 (January 2025)
Westlake Royal Building Products at 71 and 91 Royal Group Crescent

Dear Mr. Filipetto.

We are planning consultants writing on behalf of Westlake Canada Inc., dba Westlake Royal Building Products ('Westlake') regarding the final Draft Vaughan Official Plan 2025 ('VOP 2025') in terms of the above captioned properties.

Westlake operates well-established building products manufacturing businesses located at 71 and 91 Royal Group Crescent within the 'Vaughan Industrial Park'. Please refer to Aerial Image 1.

- Westlake has plans to expand and grow its robust operations in keeping with its thirty-five-year history of manufacturing, warehousing and distributing building products for the construction industry.
- Westlake's products are essential to servicing the residential & ICI building products market in the city, the region and in Canada, broadly supporting region-wide housing and related construction activities.
- Westlake, with its significant work force, serves the regional market from this convenient and accessible location within the city.

We request certain modifications to the proposed 'employment areas' policies to improve consistency with the *Planning Act* and Provincial Planning Statement 2024 ('PPS 2024') based on the following:

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AERIAL PAGE 1
WESTLAKE CANADA INC. O/A WESTLAKE ROYAL BUILDING PRODUCTS



71 & 91 Royal Group Crescent

Provincial ‘Employment Areas’ Policies per the *Planning Act* & PPS 2024

As per the *Planning Act*, and as further set out in the PPS 2024;

Employment area: means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the *Planning Act*. Uses excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.

The VOP 2025 interprets provincial policies per Section 2.2.4 ‘Employment Areas’, comprising two categories, as shown on ‘Schedule 1 Urban Structure’ and ‘Schedule 13 Land Use Designations’ (See attached Figures 1 and 2 respectively.)

“Core Employment Areas meet the definition of “area of employment” in Section 1 of the *Planning Act* and are reserved for industrial manufacturing, warehouse and related uses, including research and development and ancillary **Retail** and office uses. Lands in **Core Employment Areas** are designated **General Employment** on Schedule 13 to this Plan and in accordance with policies contained in 2.2.4.3.” (page 49 of Draft VOP 2025 – Jan. 2025 release)

“Supporting Employment Areas do not meet the definition of “area of employment” in Section 1 of the *Planning Act* and permit a broader range of uses, including certain **Employment-Supportive Uses**. Lands in **Supporting Employment Areas** are designated **Prestige Employment** or **Employment Commercial Mixed-Use** on Schedule 13 to this Plan.” (page 49 of Draft VOP 2025 – Jan. 2025 release)

Public planning policies, including that of the Region of York Official Plan (‘YROP’), set out to reinforce and protect the long-term viability of existing and planned industrial, manufacturing, warehousing and distribution uses, and related uses within established Employment Areas, as defined above.

To maintain VOP 2025 consistency with the *Planning Act* and conformity with the PPS 2024, we recommend the following modifications to ensure ‘Core Employment Areas’ policies are in compliance and designed to achieve defined planned functions.

FIGURE 1

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

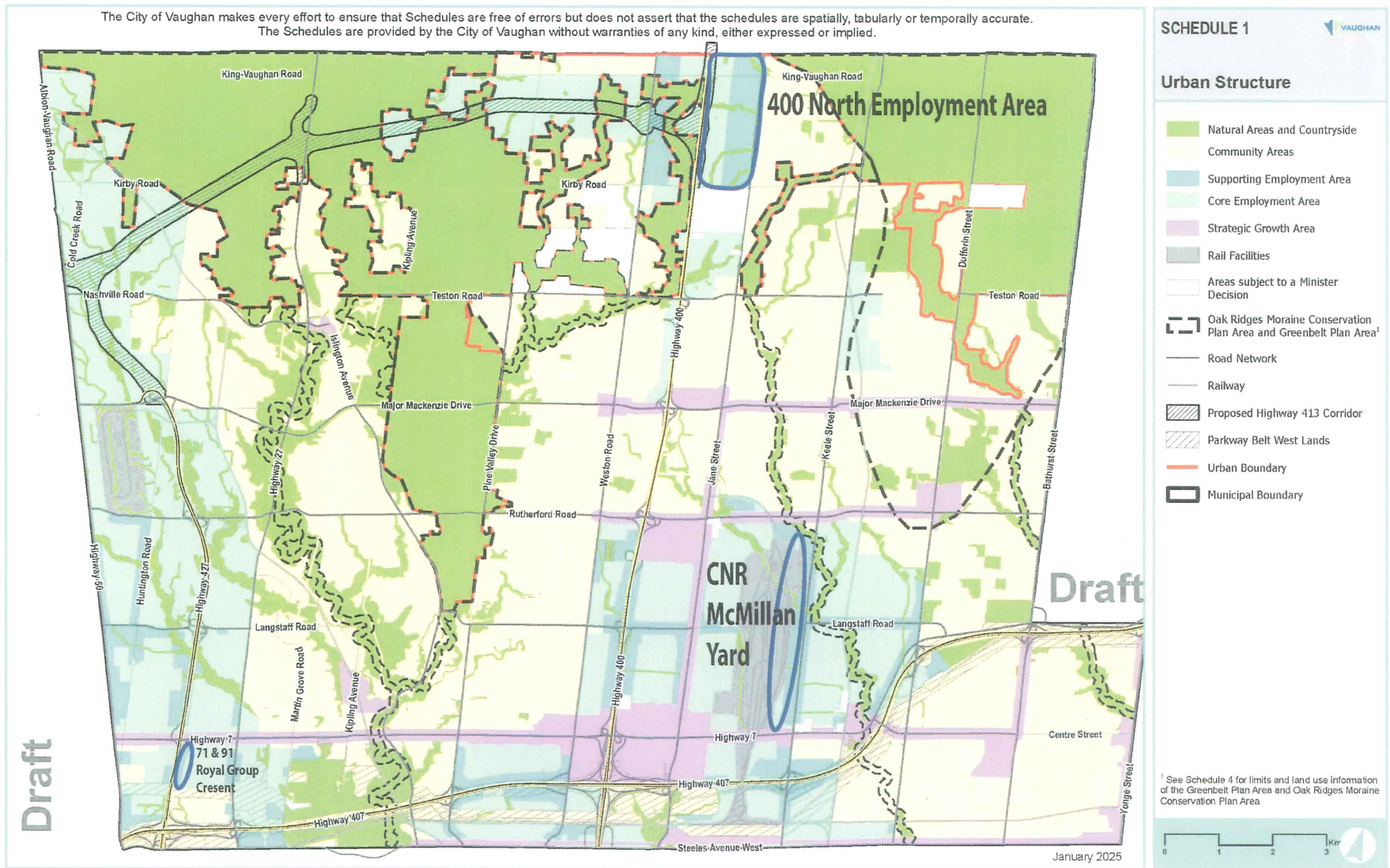
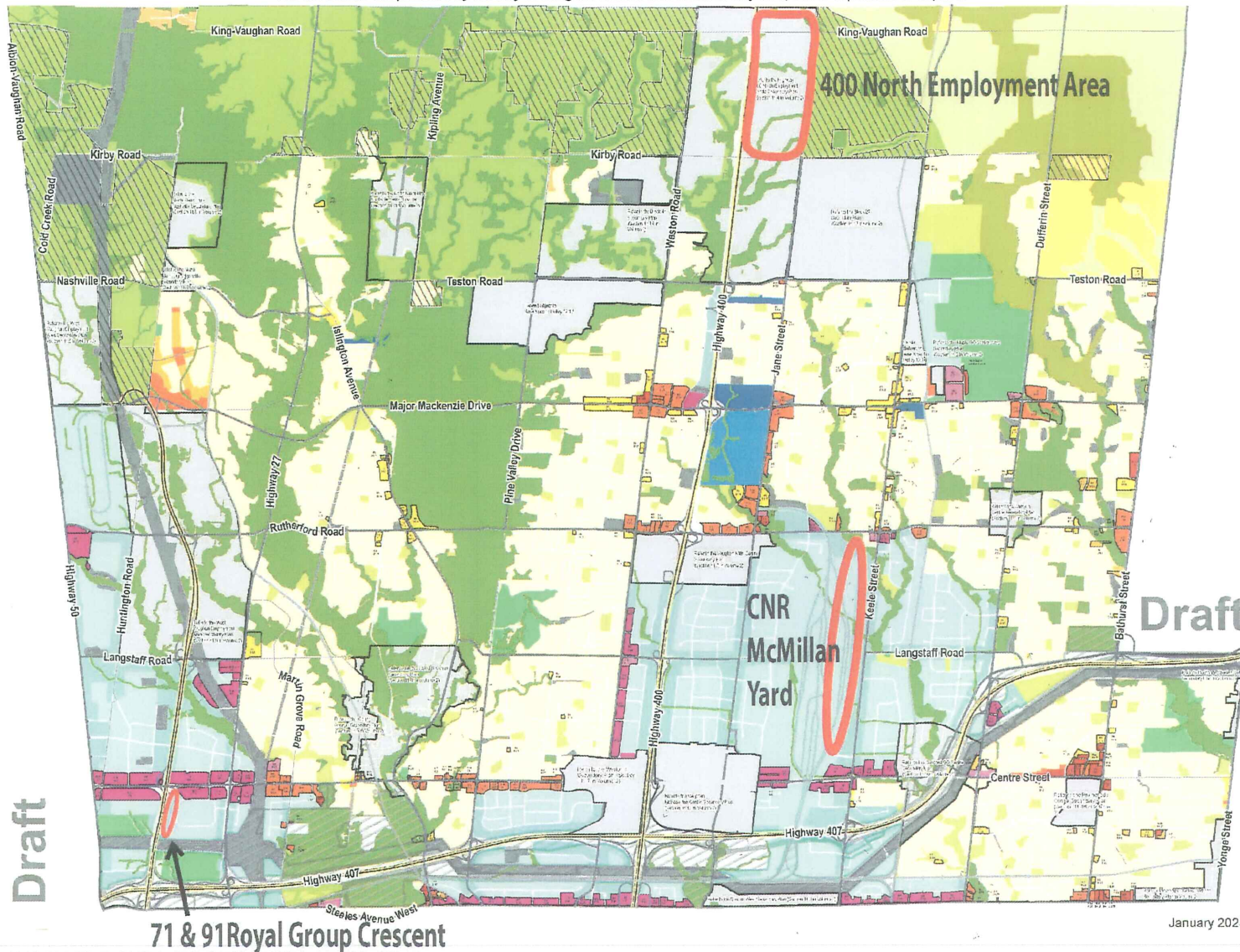


FIGURE 2

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



SCHEDULE 13



Land Use Designations

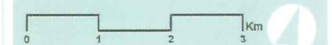
- New Community Area and New Employment Area as identified in policy 2.2.6
- Natural Areas
- Parks
- Private Open Spaces
- Prime Agriculture
- Rural
- Low-Rise Residential
- Low-Rise Mixed-Use
- Mid-Rise Residential
- Mid-Rise Mixed-Use
- High-Rise Residential
- High-Rise Mixed-Use
- Transitional Mid-Rise Mixed-Use
- Employment Commercial Mixed-Use
- General Employment
- Prestige Employment
- Major Institutional
- Theme Park and Entertainment
- Parkway Belt West Lands
- Infrastructure and Utilities
- Lands Subject to Secondary Plans or Particular Area Specific Plans¹
- Oak Ridges Moraine Conservation Plan Area and Greenbelt Plan Area²
- Natural Core Area
- Natural Linkage Area
- Countryside
- Hamlets
- Railway
- Road Network
- Municipal Boundary

- Proposed Park³
- Proposed School³

¹ Refer to Schedules 14B-C for Lands Subject to Area and Site Specific Policies in Volume 2

² See Schedule 4 for limits and land use information of the Greenbelt Plan Area and Oak Ridges Moraine Conservation Plan Area

³ Locations are conceptual and may be modified without an amendment to this plan.



January 2025

Modification No. 1: Policy 1.4.1.8 – “one lot depth in from ... Provincial highway”

Both ‘Schedule 1 Urban Structure’ and ‘Schedule 13 Land Use Designations’ illustrate a thin band that is parallel to the western edge of this industrial area’s frontage with Highway 427, described as ‘Supporting Employment Area’ and ‘Prestige Industrial’ respectively.

This planning context applies to a portion of the 71 and 91 Royal Group Crescent properties, et al. To ensure ‘Core Employment Areas’ are able to achieve defined planned functions please refer an issue concerning policy 1.4.1.8, under 1.4.1 General Policies which reads:

It is the policy of Council:

*1.4.1.8 That boundaries of Land Use designations on Schedule 13 are approximate except where delineated by a Secondary Plan, Area-Specific policy, Site-Specific policy, or where they coincide with fixed distinguishable features such as streets, utility corridors, railroads or major natural features. For the purposes of delineating between **Prestige Employment** and **General Employment** Land Uses and between **Employment Commercial Mixed-Use** and **Prestige Employment** or **General Employment** Land Uses, the use abutting an arterial street or Provincial highway shall be interpreted to extend one lot depth in from the arterial street or Provincial highway. In all other instances, the boundaries of Land Use designations will be determined by a review of existing Zoning By-laws; prevailing lot depths; orientation of lot frontages; lot patterns; and land use patterns. Where the intent of this Plan is maintained, minor adjustments to the boundaries will not require amendment to this Plan. It is intended that the extent of the various land use designations be established through the Block Plan process. The detailed boundaries will be reflected in the approved subdivision plans and Zoning By-Law. (Underlining added for emphasis)*

By analysis the ‘as-built’ 71 and 91 Royal Group Crescent properties are occupied by large industrial buildings on large lots, given the character of products manufactured, and the processing and distribution functions required. (See Aerial Image)

- 71 Royal Group Crescent has an average lot depth of about 170 metres and the lot is about 4.0 ha. (9.88 acres) in land area.
- 91 Royal Group Crescent has an average lot depth of about 280 metres and the lot is about 6.7 ha. (16.5 acres) in land area.
- The 71 and 91 Royal Group Crescent lots front onto Highway 427, where each of the buildings occupying these lots present high quality facades running along about 80% of the highway frontage.

As is, policy 1.4.1.8. is absolute, undermining the flexibility that business requires in a 'Core Employment Area' as per the provincial planning policies, where the protection of employment land use functions is mandatory.

Boundary delineations between land use designations should be more fairly determined by the Zoning By-law including; prevailing lot depths; orientation of lot frontages; lot patterns; and land use patterns in where necessary, 'split zoning' in support of planned 'employment area' functions.

This approach more fairly applies to what is a fundamentally a 'Core Employment Area', particularly as the boundaries of employment area lots are typically large and include substantial building coverage as in this case. Further, as these lots front onto 400 Series Highways, they are subject to VOP 2025 urban design policies and the land use policies of Ministry of Transportation.

Proposed Modification No. 1: It is recommended that the following underlined text from policy 1.4.1.8 be deleted to support employment area planned function, scale and context.

"...the use abutting an arterial street or Provincial highway shall be interpreted to extend one lot depth in from the arterial street or Provincial highway. In all other instances..."

Comparing & Contrasting How VOP 2025 Addresses other Employment Areas

While the planning context of 71 and 91 Royal Group Crescent properties is set out above, other employment areas in the city are treated differently per 'Schedule 1 Urban Structure' and 'Schedule 13 Land Use Designations'.

For example, consider the Keele Street Industrial Corridor, north of Highway 7, to the immediate east of the CN MacMillan Yard where the VOP 2025 identifies the 'Supporting Employment Area'. Given the industrial activities associated with rail marshalling and truck yards and the character of the 'Core Employment Area' land use functions along Keele Street, this land use appears contradictory when compared elsewhere in the city.

As well, 'Supporting Employment Area' provides for a broader range of mixed uses, potentially incompatible with rail and truck yard activities as well as outside storage. In addition, this creates overly restrictive requirements for bona fide industrial operations viewed as 'Core Employment Area' when considering improvement and/or expansion of industrial activities nearby.

To look at this issue another way, please refer to the description of ‘Prestige Employment’, as set out in the Draft VOP 2025, which reads:

Prestige Employment

The Prestige Employment designation allows for employment and Employment-Supportive Uses and provides for transition to adjacent non-employment uses as well as activating ground floor uses.

It is the policy of Council:

4.2.3.2 *That Prestige Employment lands shall generally be located on arterial streets forming the edges of Employment Areas, and along 400-series highways, in order to:*

i. allow the areas to provide a transition between General Employment lands and more Sensitive Land Uses;

ii. locate greater intensity uses on key transportation routes; and

iii. provide locational opportunities for activities which require high visual exposure and an attractive working environment.

4.2.3.3 *That on lands designated as Prestige Employment, the following policies shall apply:*

a. development shall be characterized by high quality buildings in an attractive pedestrian-friendly, connected and transit-oriented working environment;

b. a variety of lot sizes should be made available to provide flexibility for attracting and accommodating a wide range of employment uses;

c. the following uses are permitted in addition to those uses permitted through policy 4.1.1.8:

i. industrial uses, including manufacturing, warehousing (but not Retail warehousing), processing, and distribution uses located within wholly enclosed buildings and which do not require outside storage. Outside storage is not permitted on lands designated Prestige Employment; (Underlining added for emphasis)

Simply put, industrial locations such as 71 and 91 Royal Group Crescent and the lands along Keele St. - CNR Marshalling Yard, by comparison, do not provide or need to provide for a transition to adjacent non-employment uses as none appears to exist.

Also, as an example, and in contrast to 71 and 91 Royal Group Crescent, et al, reference is made to the lands that front along Highway 400 (Kirby Road area) as these lands are represented as 'Core Employment Area' and are designated 'General Employment'.

Proposed Modification No. 2: To protect employment areas by ensuring planned functions may be fulfilled per provincial planning policies, it is recommended that the employment areas be more carefully reviewed to be consistently applied, and fully and appropriately designated as 'Core Employment Areas' and 'General Employment' per the final VOP 2025, as appropriate.

Urban Design Objectives are Better Managed Via Specific VOP 2025 Policies

Urban design goals and objectives sought by the city for properties that front provincial highways and arterial roads should be better managed through specific VOP 2025 policies and zoning by-law regulations, with development standards that avoid inhibiting 'Core Employment Area' planned functions.

As an example, any outside or outdoor storage associated with planned function could be better managed by modern screening and/or buffering techniques and technologies and building design and placement on specific lots.

Proposed Modification No. 3: Review VOP 2025 policies to achieve and manage urban design goals and objectives for employment areas through specific VOP 2025 policies, rather than by applying employment area land use designations to this effect, so to avoid inhibiting 'Core Employment Area' planned functions.

Conclusion & Proposed Modifications to Draft VOP 2025

Public planning policies and regulations reinforce the protection and long-term viability of existing and planned industrial, manufacturing, warehousing and distribution uses, and related uses within established 'Employment Areas'.

While the final Draft VOP 2025 policies and schedules set out to present provincial 'Employment Areas' goals and objectives, we request certain modifications to improve consistency with the *Planning Act* and conformity with the PPS 2024.

Proposed Modification No. 1: It is recommended that the following underlined text from policy 1.4.1.8 be deleted to support employment area planned function, scale and context.

“...the use abutting an arterial street or Provincial highway shall be interpreted to extend one lot depth in from the arterial street or Provincial highway. In all other instances...”

Proposed Modification No. 2: To protect employment areas by ensuring planned functions may be fulfilled per provincial planning policies, it is recommended that the employment areas be more carefully reviewed to be consistent and fully and appropriately designated as ‘Core Employment Areas’ and ‘General Employment’ per the final VOP 2025, as appropriate.

Proposed Modification No. 3: Review VOP 2025 policies to achieve and manage urban design goals and objectives for employment areas through specific VOP 2025 policies, rather than by applying employment area land use designations to this effect, so to avoid inhibiting ‘Core Employment Area’ planned functions.

As a general note we recommend that all the definitions that are direct quotes from the *Planning Act* and/or the PPS 2024 be identified as such in the final VOP 2025.

Please ensure our firm remains on the City’s mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related items, and any Council decision or actions regarding the above captioned VOP 2025 processing.

Thank-you in advance for your co-operation.

Yours truly,

Pound & Stewart Associates Limited



Philip Stewart MCIP, RPP

/la 1711_Draft VOP 2025_April.25.2025

Attachments as noted herein. (Aerial Image 1 & Figures 1 and 2)

cc. Mayor S. Del Duca, City of Vaughan (via email)

cc. Councillor A. Volpentesta, Ward 2, City of Vaughan (via email)

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cc. Mr. T. Coles, MCIP, RPP, Office of the City Clerk, City of Vaughan (via email)

cc. Mr. Mr. V. Musacchio, Office of the Deputy City Manager (Acting), Planning & Growth Management, City of Vaughan (via email)

cc. Ms. N. Tuckett, MCIP, RPP, Director of Planning & Growth Management, City of Vaughan (via email)

cc. Ms. C. Murphy, MCIP, RPP, Project Manager, Policy Planning, City of Vaughan (via email)

cc. Mr. D. Salvatore, CN MacMillan Yard, City of Vaughan (via email)

cc. Miller Thomson LLP, (via email)

cc. client