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March 25, 2026

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

C6.  
Communication  
CW(PM) – March 31, 2026  
Item No. 5

Dear City Clerk and Members of Council:

**Re: Submission to the Committee of the Whole – March 31, 2026 Public Meeting  
On behalf of Westlake Canada Inc., dba Westlake Pipe & Fittings ('Westlake')  
Regarding Bostar Inc. and 1639326 Ontario Ltd.  
5875 Highway 7 and Part of Block 1, Plan 65M-3033  
Official Plan Amendment City File OP-25.007 ('OPA')  
Zoning By-law Amendment City File Z.25.017 ('ZBA')**

We are the solicitors for Westlake Canada Inc., dba Westlake Pipe & Fittings ('Westlake'), and are writing to express our client's concerns regarding the Bostar Inc. and 1639326 Ontario Ltd. OP-25.007 ('OPA') and Z.25.017 ('ZBA') applications (the "**Applications**").

Westlake owns and operates on lands abutting the lands which are the subject of the Applications and are within an Area of Employment. It has registered an activity for those lands on the Environmental Activity and Sector Registry that would, but for being prescribed for the purposes of subsection 20.21 (1) of the *Environmental Protection Act*, require an environmental compliance approval in accordance with subsection 9 (1) of that Act. It therefore constitutes a **specified person** and asks that these comments be considered written submissions for the purposes of determining its right to appeal any decision of Council related to the Applications.

### **Westlake's Lands and Activities**

Westlake's lands at 131 and 155 Regalcrest Court abut the lands which are the subject of the Applications (the "**Application Lands**") as shown in the attached Context and Location Map. It also operates at 101 Regalcrest Court and on a licensed portion of the Hydro Electric Power Corridor ('HEPC'), which is used for the outside storage of their manufactured pipe products. Please refer to 'Aerial Image 1' showing Westlake's business operations relative to the applicant's property.

Westlake manufactures pipes, fittings and building products on its lands. It employs over 200 people in this area, utilizes the services of a number of other businesses within the Area of Employment located just south of the Application Lands and has been doing so for over thirty five years. Westlake's industrial products are essential to servicing the residential & ICI

building products market in the city, the region and in Canada, supporting region-wide housing, infrastructure and other development and construction activities.

Westlake's properties are located within the convenient, accessible and strategically important West Vaughan Employment Area, proximate to the Vaughan Enterprise Zone ('VEZ' – south), relying on nearby road systems to facilitate and expedite goods movement. The VEZ comprises an 'Employment Area' of high economic output and economic development achieving the wise use of infrastructure investment, to support job creation.

### **Primary Concerns**

Westlake is concerned with the Applications because they propose the introduction of sensitive land uses (primarily residential) immediately abutting its industrial manufacturing facilities. That use would be incompatible with its continuing manufacturing operations, and any expansions or process changes it wishes to implement in the future. Westlake's activities generate significant truck traffic as well as noise, dust, odour and some air emissions which could have significant negative impacts on those sensitive uses.

Westlake does not believe that the analysis carried out to date is complete or fully accurate, particularly with respect to its operations. There was no consultation of Westlake by the Applicant's engineers in the preparation of those studies. No consideration was given to expansions or changes to its operations.

Westlake's business and markets are fluid. Periodic expansions and changes to products are needed to meet changing demands. It therefore needs from the Ministry of the Environment and Climate Change periodic Environmental Compliance Approvals and/or registrations in the Environmental Activity and Sector Registry for those changes. For example, there is already planning underway with respect to the addition of silos for more raw material storage needed for increased production. It is those changes which the proposed introduction of sensitive uses would jeopardize and which cannot be accommodated easily by simply meeting all guidelines based upon current production activities.

The concern is not simply complaints and the potential of emissions not meeting the regulatory and guideline limits due to the increase proximity of the sensitive uses and the steps being taken to prevent or curtail current operations. Introducing sensitive land uses to the Application Lands, much closer than such uses currently exist, could prevent Westlake, and other employers in the area, from appropriately changing activities and processes to accommodate new market demands, or new technologies. This would impact Westlake's ability to remain current and competitive in the market and could cause its lands to become unfit for continued operations.

The Applications suggest that the City can exercise its discretion to classify the Applicant Lands as a Class 4 area so a more degraded acoustical environment can be accepted there. Class 4 classification is a last resort option, where other factors overwhelmingly require the introduction of sensitive uses. There is no justification raised by the applicant for imposing a degraded acoustic environment on residents when that can be avoided.

### **Compatibility with Existing Land Uses**

There are compatibility and protection of industrial land policies embedded throughout all of the Province, the Region and the City's planning instruments. They are simply too numerous



to cite in a letter of this nature. This letter highlights a few to provide a flavour of the policy regime that the Applications are inconsistent with and does not conform to.

The Applications are completely inconsistent with and do not satisfy the Provincial D-6 Environmental Guidelines. Those Guidelines impose in the vicinity of Westlake's well-established industrial operations the concept of a Minimum Separation Distance. The attached 'Aerial Image 2' illustrates the 'Minimum Separation Distances' and 'Potential Influence Areas' as established for Class II and Class III industrial areas and sensitive land uses. Obviously, the required minimum separation between property lines is not maintained.

Generally, the Provincial Planning Statement ("PPS 2024") requires planning and development to "avoid ... potential adverse effects from odour, noise and other contaminants" and to "avoid...potential impacts on the long-term economic viability of employment uses within existing or planned employment areas."<sup>1</sup> We are still in the land use planning stage, where the City and landowners are directed to proactively "plan" around odour and noise incompatibilities to ensure long-term operational and economic viability for industry. That is best achieved by ensuring the Application Lands is not designated or zoned for residential uses, particularly at the heights, locations and configurations proposed.

The Westlake Lands are currently used for and planned for industrial purposes consistent with the Applicant Lands' designation of "Commercial Mixed Use", prohibiting sensitive residential uses, while encouraging a range of more compatible commercial employment functions.

### **Jeopardizes the Planned Function of the Westlake Lands and Employment Area**

Crucially, Site Specific Policy 13.58 of the Vaughan Official Plan 2010 (VOP 2010) explicitly states that 131 and 155 Regalcrest Court are to be used for its existing industrial functions until at least November 30, 2040. Expansions are explicitly contemplated and permitted. That being the planned function for those lands, given the incompatibility with sensitive uses and the risk of negative impact on not just the new residents by the threat to the planned function of the Westlake lands, the Applications are premature until that planned function comes to an end.

Within 300 metres of an Employment Area, there is an obligation to protect those Employment Areas. Failure to protect and preserve industrial planned functions, by prohibiting sensitive uses to avoid land use compatibility issues may weaken and/or undermine industrial planned functions through or manifest as:

- Land use conflicts, land use incompatibility and other destabilizing issues;
- The uncertainty of whether sensitive uses will be introduced and adversely affect the planned function of existing and viable industrial business operations will negatively affect future investment decisions;
- Increased difficulty or impossibility for industries to obtain, update, modify or alter their 'Environmental Compliance Approvals' (ECAs) and 'Environmental Activity or Sector Registrations' (EASRs) needed to respond to changing markets and technologies;

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<sup>1</sup> Policy 3.5.1 and 2.8.1.3 of the PPS 2024.



- A narrowing of industrial tenants and operational types;
- Additional demand and/or competition for on public infrastructure, such as water, wastewater and transportation may occur;
- Additional residential traffic in the vicinity of industrial areas increases the potential for conflict and delays;
- A loss of valuable manufacturing, distribution, warehousing and administrative jobs and loss of economic development;
- A loss of the city's employment tax base;
- Additional pressures for employment land conversions.

### Requests

Westlake asks that City Council refuse the Applications at this time as premature and because of its concerns about incompatibility and the negative effects on the surrounding Employment Area and Areas of Employment.

Please also register Westlake's land use planning consultant, Philip Stewart, MCIP, RPP as a deputant to speak to this item at the Public Meeting of the Committee of the Whole scheduled for **March 31, 2026**.

We would ask that you provide us and Pound & Stewart Planning with notice of any further public meetings to be scheduled with respect to the Applications and the development of the Subject Site. Please also provide notice and copies of all updates, reports, Committee of the Whole and Council Agenda related items, and any Council decision or actions related to the adjacent and/or proximate properties to Westlake's business operations.

Thank you for your co-operation and assistance. Please let us know if there are any questions or if additional information is needed.

Yours very truly,

**MILLER THOMSON LLP**

Per:



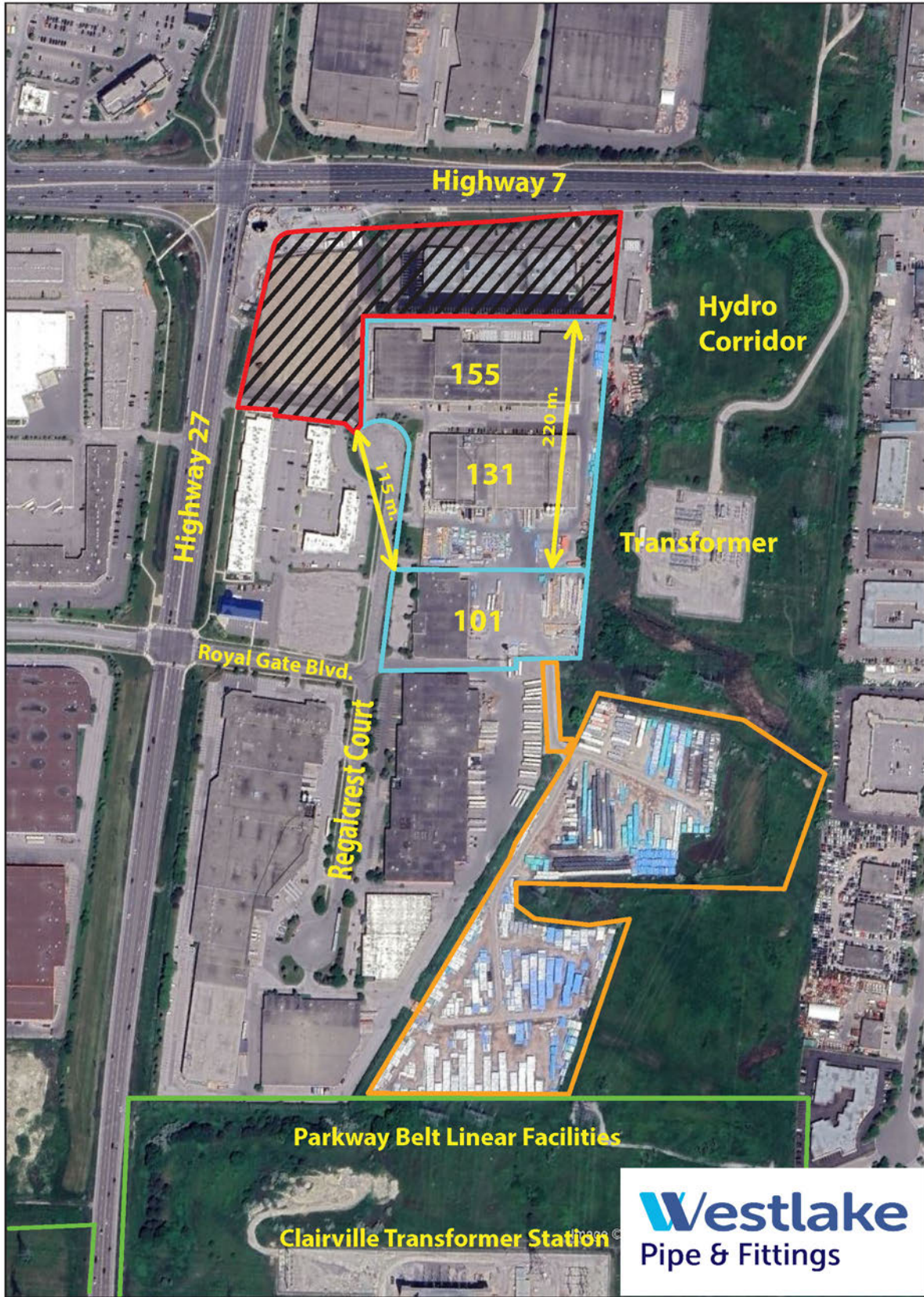
David Tang  
Partner  
DT/ac

Enclosures





**AERIAL IMAGE 1:  
 APPLICANTS PROPERTY RELATIVE TO WESTLAKE CANADA INC. O/A WESTLAKE PIPE & FITTINGS**



1711\_Image1\_MAR.2026

**Legend**







-  5875 HIGHWAY 7 AND PART BLOCK 1, 65M-3033  
 PART OF LOT 5, CONCESSION 8  
 Applicant: Bostar Inc. and 1639326 Ontario Ltd.
-  101, 131 & 155 REGALCREST COURT
-  NORTHERN & SOUTHERN OUTSIDE STORAGE BLOCKS (LICENCED)



**AERIAL IMAGE 2:  
D-6: SENSITIVE LAND USE INFLUENCE AREA AND MINIMUM SEPARATION DISTANCE OF 70m**



**Legend**

-  5875 HIGHWAY 7 AND PART BLOCK 1, 65M-3033 Applicant: Bostar Inc. and 1639326 Ontario Ltd.
-  101, 131 & 155 REGALCREST COURT (WESTLAKE)
-  CLASS II MINIMUM SEPARATION DISTANCE OF 70m
-  SENSITIVE LAND USE INFLUENCE AREA 300m
-  SENSITIVE LAND USE INFLUENCE AREA 1000m
-  CLASS III MINIMUM SEPARATION DISTANCE OF 300m

NOTE: D-6: THE CLASS II OR III DISTINCTION IS TO BE DETERMINED.

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