

HUMPHRIES PLANNING GROUP INC.

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May 19, 2020
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Chair and Members of the Committee of the Whole
The Corporation of the City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
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**COMMUNICATION : C 8
COMMITTEE OF THE WHOLE (2)
MAY 20, 2020
ITEM # 10**

Attention: Mr. Todd Coles, City Clerk

Dear Mr. Coles:

**Re: Item 10, Committee of the Whole Meeting, May 20, 2020
Staff Report on Employment Land Conversion Requests ("Staff Report")
Vaughan 400 North Landowners Group Inc. (the "Group")
Blocks 34W and 35 (the "Subject Lands")
Lots 26 through 35, Vaughan Conc. 5 & Lot 1, City of Vaughan**

Humphries Planning Group represents the Group, which consists of numerous owners of property within the Subject Lands. Please distribute a copy of this letter to the Chair and Members of the Committee of the Whole in advance of their May 20th meeting.

We and our clients have reviewed the Staff Report, and respectfully disagree with its rationale and recommendations as applied to the Subject Lands. We would like to offer the following comments for consideration as the City advances its assessment of site-specific employment land conversions requests. The City's conclusions will be used to inform and assist York Region (the "Region") in identifying suitable locations for employment conversion through potential amendments to the Region's Official Plan and current land use planning policies.

Staff Position on the Group's Site-Specific Request

The Group's proposed partial conversion is identified as Request No. 7, and discussed in the Staff Report's *Attachment 4 – Summary Table of Staff Recommendations*, as well as in *Attachment 5 – Staff Recommendations for Each Request*.

The Subject Lands are governed by Region Official Plan Amendment No. 52 ("ROPA 52") and the City's Official Plan Amendment No. 637 ("OPA 637").

Staff's "summary of assessment" is as follows:

...employment areas within ROPA 52 will not be considered for conversion as the lands were brought into the urban boundary to accommodate employment growth to 2031 and have not yet had an opportunity to properly develop due to servicing constraints.

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The Staff Report's recommendation is that Council should not support the request for partial conversion at this time.

Comments on Staff's Position

While we are confident that there was no intention to mislead, the Staff Report presents an incomplete picture (in some senses, literally) of the Group's request.

First and foremost, the Staff Report does not state or depict the true nature of the request; specifically, that it is a request for a partial conversion. The map attached to the Staff Report (Figure 1, below) only shows the proposed conversion area, not the balance of the Subject Lands, which will remain in employment designations pursuant to ROPA 52 and OPA 637.



Figure 1: Extract from Staff Report – Vaughan 400 North Employment Area Conversion Request

Our Figure 2 below depicts the entirety of the ROPA 52 area (in black cross-hatching), and the lands which will remain in employment designations (in blue). In total, 460 hectares of employment land will remain.

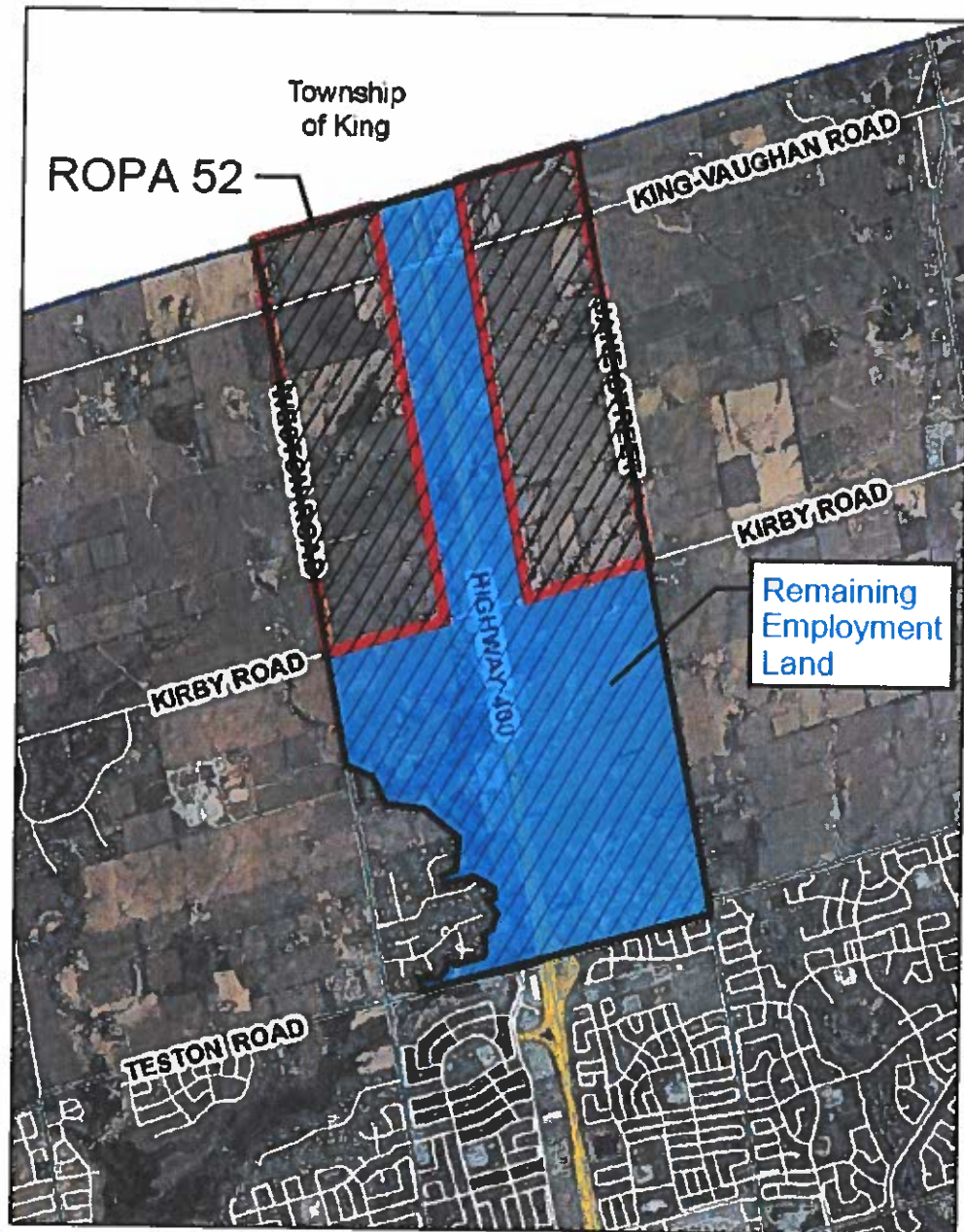


Figure 2: Vaughan 400 North Employment Area Partial Conversion in Context

Figure 2 demonstrates that the Staff Report does not properly show the actual scale and scope of the partial conversion request. We are concerned that this has the potential to improperly influence the outcome of the decision-making process.

As is far more apparent from Figure 2 than from Figure 1, the Group's intent is to establish a land use pattern consisting of an appropriate mix and range of residential, employment, institutional, recreational, park and open space uses. In other words, what Figure 2 shows, and Figure 1 does not, is that the Group proposes planning for a complete community.

There is another problem of incompleteness in the Staff's Figure 1, revealed in our Figure 3:

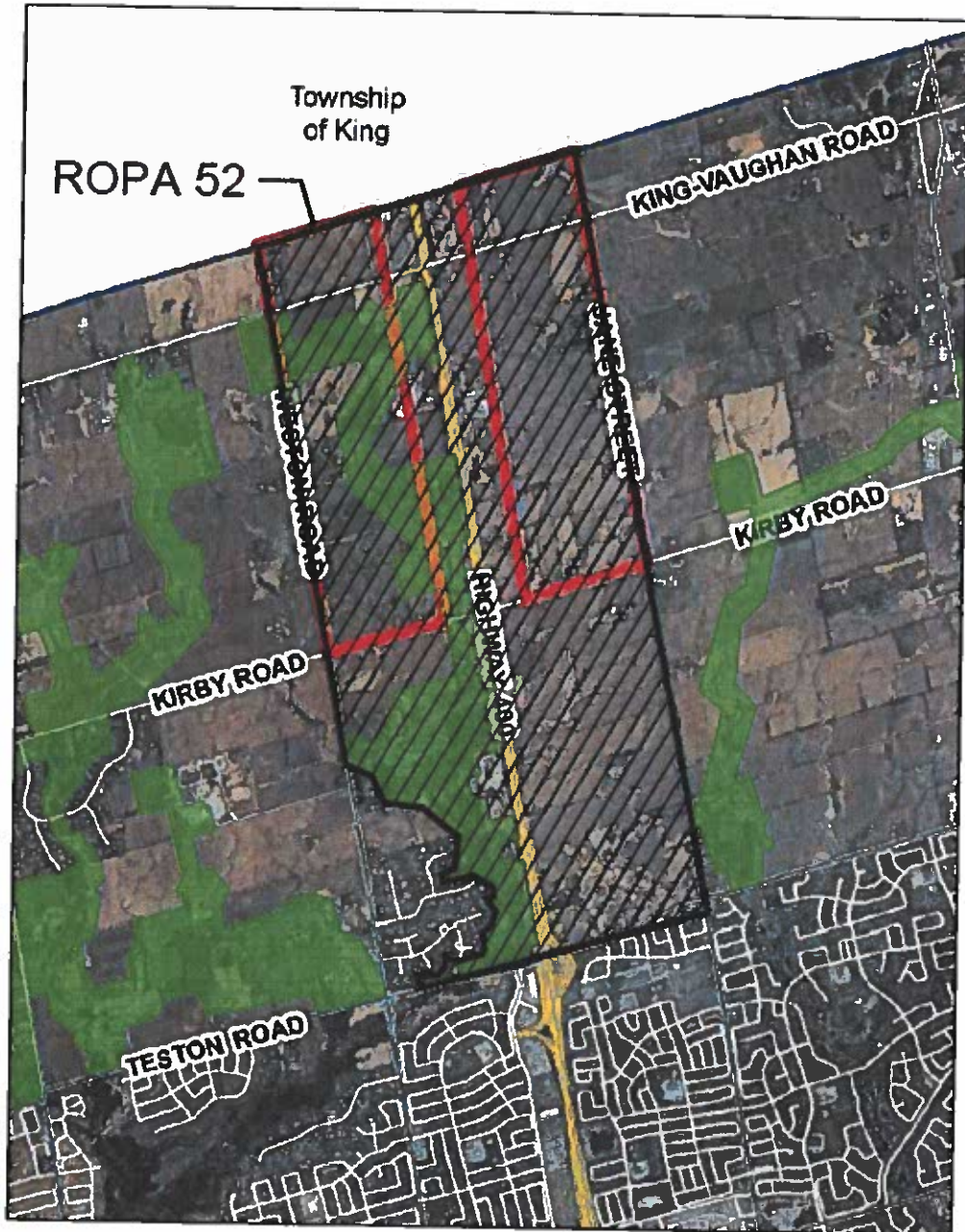


Figure 3: Greenbelt Plan Areas of the Vaughan 400 North Employment Area

Figure 3 shows the impact of the *Greenbelt Plan* on the ROPA 52 area, which the Staff Report's Figure 1 does not. It is apparent that much of the land in Block 35W which is proposed for conversion to residential is, in fact, in the Greenbelt, and is not available for employment development in any case. The Staff Report's Figure 1 therefore exaggerates the amount of employment land that will be lost to the partial conversion.

As is also apparent from Figures 2 and 3, the Group's request locates Prestige Employment uses along Highway 400, ensuring exposure and accessibility, while establishing residential land uses further to the east and west, along the edges of Jane Street and Weston Road. In this regard, it is important to note that Jane Street has been identified as a *Regional Transportation Corridor*, which is intended to be the focus of major transit investment, and evolve into a highly active, transit-orientated corridor geared towards residential and commercial growth.

We are also concerned about the reasons provided against the partial conversion in the Staff Report. Staff identified the unavailability of servicing as the primary reason why the Subject Lands have not been able to develop for employment uses. While this is a factor, there are others, including:

1. The size of the employment area is too large when compared to market demand in this location. And, when seen in the context of the estimated supply of vacant employment lands in the Region and City, there is an over-supply available to accommodate projected employment growth over the next planning horizon.
2. Continuing uncertainty over the status of the GTA West Corridor makes it extremely difficult to develop for employment uses. Leaving aside the ongoing disputes about routing the Corridor, there is no funding plan for the infrastructure itself.
3. Since the approval of ROPA 52 in November of 2011 and subsequent approval of OPA 637, there has been no capital plan for or investment in the necessary servicing infrastructure. The Regional and City infrastructure required to serve the Subject Lands was expected to proceed in a coordinated manner with the Highway. This has not happened.

The proposed partial conversion offers the potential to contribute private funding to extend servicing to this location in coordination with other landowner organizations. The Group is actively engaged in efforts to facilitate the provision of Regional infrastructure that would provide for the extension of municipal sanitary servicing, not only for the Subject Lands, but in conjunction with Block 27.

Finally, and perhaps most importantly, a City recommendation on the Group's request is premature subject to the completion of the forthcoming Regional land needs assessment, which is in turn awaiting direction from the Province's forthcoming land needs assessment methodology.

The Regional land needs assessment, when completed in accordance with the new Provincial methodology, will provide essential input to a comprehensive analysis of the supply of residential and employment lands. This is necessary in order to properly evaluate population

and job growth forecasted to 2041, and must be considered in determining the appropriateness of site-specific employment area conversions.

Also relevant to this undertaking will be the anticipated updated 2041 population and job forecasts from the Province, which will permit a fully-informed assessment by the Region with input from the City and other local municipalities.

In summary, HPGI disagrees with Staff's analysis and recommendation. We respectfully ask that your Committee recommend to Council that the City defer adoption of any position on site-specific Request No. 7 until the land needs assessment is completed by the Region.

If the Committee and Council are not comfortable with a deferral, then we submit that Staff's reasoning does not justify its recommendation of refusal, and that for the reasons outlined above, the appropriate decision would be to support approval of the partial conversion.

Yours sincerely,
HUMPHRIES PLANNING GROUP INC.



Rosemarie Humphries, BA, MCIP, RPP
President

cc: Mr. Bill Kiru, Acting Deputy City Manager, City of Vaughan
Mr. Paul Bottomley, Manager of Policy, Research and Forecasting, Regional Municipality of York
Vaughan 400 North Landowners Group Inc.
Mr. Michael Melling, Davies Howe LLP, Counsel to the Vaughan 400 North Landowners Group Inc.