

HUMPHRIES PLANNING GROUP INC.

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**COMMUNICATION : C 9
COMMITTEE OF THE WHOLE (2)
MAY 20, 2020
ITEM # 10**

The Corporation of the City of Vaughan
2141 Major Mackenzie Drive
Vaughan, Ontario
L6A 1T1

Attention: Mr. Todd Coles, City Clerk

**Re: Staff Report– Requests for Comments: York Region Evaluation of Employment Land
Conversion Requests
Committee of the Whole Meeting – May 20, 2020
Alvit Developments Inc. & Robvit Developments Inc.
11, 23, 37 Jacob Keffer Parkway, City of Vaughan**

Humphries Planning Group is the agent and planning consulting for Alvit Developments/Robvit Developments Inc., the legally registered owners of the properties municipally addressed 11, 23, 37 Jacob Keffer Parkway in the City of Vaughan. We have made previous written submissions to the City and Region requesting land use conversion of the subject land for the purposes of adding residential land use permissions to the subject site. The intended use of the subject site would be to accommodate the redevelopment of the property for a residential mid-rise mixed-use development. It is anticipated that this building format would be complimentary to all surrounding land uses, provide convenient pedestrian access to the Rutherford Go Station and substantially contribute to creating a complete community through redevelopment of the site.

We have reviewed the Planning and Growth Management Report dated May 20th, 2020 with our client and respectfully disagree with the recommendations contained in the Report. We provide the following comments for consideration as the City advances their assessment and endorsement of site-specific employment land conversion requests which will be used to inform and assist the Region in identifying suitable locations for employment conversions through potential amendments to the Regional Official Plan and current land use planning policies.

Site Specific Conversion Request

The Alvit Developments/Robvit Developments Inc. employment conversion request is identified as Request Number 4 in Attachment 4 – *Summary Table of Staff Recommendations* of the Committee of the May 20, 2020 Committee of the Whole Report.

Staff's Summary of Assessment is that, *"the site is bounded by industrial uses on three sides and the request may destabilize or adversely affect current or future viability and/or identity of the*

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employment area”. Further, the conversion could potentially prejudice the future of the current uses and create expectation of further conversions. As a result of this assessment, Staff’s recommendation is that they, “do not support the request for conversion”, at this time.

Comments on Staff’s Position

Firstly, we are concerned Staff’s assessment that the property is surrounded by employment uses on three sides is not accurate. As seen in Figure 1 below, the property is bounded by low-rise residential uses to the north, open space/natural areas with direct access to a formal recreational trailway system to the east, and a vacant undeveloped lot to the south. Further, it is noted that although the lands located on the west side of Jacob Keffer Parkway are designated as employment, they are predominantly occupied by commercial, retail and restaurant uses. Despite the fact that the area was intended to primarily accommodate a cluster of industrial activities, it has not fully developed for these purposes. The property does not form part of a contiguous employment area as staff have suggested. The subject site is more indicative of an island parcel with only a partial linkage to other potential employment uses. As such, the proposed conversion will not destabilize the viability of the employment area nor would it impact the ability for the employment area to operate successfully.



Figure 1: Surrounding Context

Secondly, questions of precedent and prejudice respecting the conversion have been highlighted by Staff. Notwithstanding our concerns with this type of statement, if staff are concerned with the potential setting of a precedent as a result of the conversion, it is our contention that it is minimal here for two primary reasons. As indicated above, the property is anomalous in terms of its context with respect to surrounding land uses. The combined effect of the diversity of surrounding land uses together with the existing character of the area would suggest that the parcel is unique. Very few other parcels in the immediate area exhibit similar interfaces with

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residential and open spaces uses and generally form part of larger, connected employment land areas. Their conversion would yield a demonstrably different outcome which would fall short of the Regional and Provincial assessment criteria. Further, it is important to note that although approval of some site-specific conversion may potentially influence the submission of subsequent conversion requests in future, the decision alone would not justify approval of a similar type application. It is our understanding of the process that all future conversion requests would be evaluated based on their own unique circumstances and merits in the context of the policy objectives and directives at that time. As such, the proposed conversion would not prejudice Staffs decision and/or appraisal of current and/or future employment conversion requests.

Finally, it remains our contention that a Staff recommendation on the conversion request is premature subject to the completion of the Land Needs Assessment (LNA) including updated population and job forecasts by the Province. The LNA will provide important technical inputs obtained through the comprehensive analysis of the supply of residential and employment designated lands are required in order to properly evaluate population and job growth forecasted to the year 2041 and should be considered in determining the appropriateness of site-specific employment area conversions. Any recommendations with respect to employment conversion requests should not preclude or predetermine the findings of the LNA and/or any decision related to employment conversion should be delayed until such time that a full analysis of all information has been completed.

For the reasons stated above, HPGI disagrees with Staff's recommendation. We ask that City Staff and Council reconsider the recommendation, as it relates to site specific conversion request number 4, and instead, support our client's employment conversion based on our comments and concerns outlined herein. Further, we also suggest that the City pause any final decision related to employment area conversions pending to the completion of the LNA by the Region in order to ensure an equitable and comprehensive review and evaluation process.

Yours sincerely,

HUMPHRIES PLANNING GROUP INC.



Rosemarie Humphries, BA, MCIP, RPP
President

cc: Mr. Goffredo Vitullo
Bill Kiru, Acting Deputy City Manager, City of Vaughan
Mr. Paul Bottomley, Manager of Policy, Research and Forecasting
Mayor and Members of Vaughan Council