

WESTON DOWNS RATEPAYERS ASSOCIATION

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March 20, 2024

Honourable Paul Calandra
Minister of Municipal Affairs
777 Bay Street, 17th Floor
Toronto, Ontario, M7A 2J3

RE: **BATTCORP HOLDINGS (VAUGHAN) LTD. AND BATTCORP II HOLDINGS (VAUGHAN) LTD.**
CIHA.23.002 - 661 AND 681 CHRISLEA ROAD VICINITY OF LANGSTAFF ROAD AND HIGHWAY 400

Dear Honourable Calandra,

The Weston Downs Ratepayers Association (WDRA) represents a residential community of 1876 homes, bounded by Rutherford Road to the north, Langstaff Road to the south, Weston Road to the east and the National Estates to the west. We are hereby asking for your assistance with respect to our concerns regarding the use of the Community Infrastructure and Housing Accelerator (CIHA) File CIHA.23.002 for Battcorp Holdings (Vaughan) Ltd. and Battcorp II Holdings (Vaughan) Ltd.

Using the CIHA for this application appears to be a misuse of the Provincial tool to benefit a specific applicant without a genuine planning justification.

We are concerned that a CIHA is being misused for this application which:

- is an isolated residential island surrounded by employment uses and a 400 series highway.
- is not compatible with the surrounding employment use and has the potential to create compatibility issues for both the proposed residential community and the current employment uses.
- is not in a planned intensification corridor.
- is not in proximity to residential infrastructure such as schools, community centres etc.
- will force elementary and middle school children to cross major Regional Roads to attend school.
- does not include adequate parks and not enough retail to be considered a vibrant, healthy community.
- is not compatible with the abutting entrance to the Hwy 400 south onramp.
- York Region strongly opposes the use of a CIHA for this land citing that the CIHA tool should not be used to by-pass good planning principles and the development of desirable, complete neighbourhoods.
- will destabilize this valuable and necessary employment area, as other land owners will also seek CIHA applications. This is evidenced by the intent of a neighbouring land owner. See (Appendix 4).

The City of Vaughan approved the use of the CIHA on December 12, 2023.

See the following links for City of Vaughan reports and minutes with respect to the Battcorp CIHA:

<https://pub-vaughan.escribemeetings.com/Meeting.aspx?Id=562eb451-36a6-46d0-bbf7-74172bc3af92&Agenda=PostAgenda&lang=English&Item=37&Tab=attachments> see item #4

<https://pub-vaughan.escribemeetings.com/FileStream.ashx?DocumentId=156885> see item #4

Location and Application Details

The 1.64-hectare subject area is located on the south side of Langstaff Road between Weston Road and Highway 400 (see Appendix 1), abutting the entrance to the Hwy 400 south onramp. This proposal consists of four towers, two of 32 storeys and two of 35 storeys, for a total of 1,488 apartment units. The overall built density is 6.34 FSI. The proposal includes only 304 m² of ground floor commercial uses and includes 1,514 parking spaces in an eight-level parking garage (four-levels aboveground and four-levels underground). The land is currently occupied by a gas station and a variety of commercial and retail uses, including a corner store, a café, office spaces, and the Reinhard College of Music & School of Worship.

Our Concerns

York Region's report in Appendix 2 articulates many of our concerns. York Region report clearly indicates:

A CIHA Order should not be used to by-pass a comprehensive planning process and policies that consider the surrounding context, good planning principles, and create desirable, complete neighborhoods.

York Region Development Planning staff do not support the use of a CIHA Order on the subject lands to permit the proposed development. A comprehensive planning exercise of the larger non-employment lands should determine the appropriate amount and type of development commensurate with required hard and soft infrastructure and services. Complete communities are not created with an isolated island of high density residential, surrounded by an employment area and adjacent to a 400-series Highway.

An example of an appropriate use of the Community Infrastructure and Housing Accelerator Order would be to advance a mixed-use project in one of Vaughan's planned intensification areas. The OPA proposes to add a new residential use on lands surrounded by an employment area, isolated from existing residential neighbourhoods. The subject lands are not currently within a residential community area, making it difficult to contribute to and create a healthy and complete community.

This application will disrupt and destabilize valuable employment lands and uses, not to mention the transportation infrastructure, namely the onramp to Hwy 400 south. There are many planned intensification corridors in Vaughan where the use of a CIHA could be justified, but this land is **not** in an approved intensification corridor. York Region stresses in their report (Appendix 2) that there are approved intensification corridors where the use of a CIHA would be appropriate to advance a mixed-use project, but this is not one of them.

See the following approved intensification areas.

Intensification Secondary Plan Areas	Planned Population	No. of Residential Units
VMC	118,000	67,000
Weston 7	51,580	27,000
Yonge Steeles Corridor	45,000	23,500
Steeles West	11,000	5,500
Promenade Centre	15,000	8,800

Conclusion

In conclusion, the WDRA along with two other ratepayer groups, representing over 15,000 homes and over 40,000 residents, have objected to the CIHA being used for this application. Mayor Steven Del Duca and Regional Councillor Linda Jackson, who were the strong voices pushing the CIHA forward, keep insisting that there was no public opposition to this CIHA application, however this is obviously not true. Three ratepayer groups objected to the use of the CIHA in this application. See Appendix 3 for the letters.

As noted in the WDRA letter dated September 11, 2023 (Appendix 3), the WDRA is not in opposition to the use of the CIHA where justified. In fact, our letter clearly stated, *"In conclusion, while the Community Housing and Infrastructure Accelerator program is a promising initiative, it is imperative that we exercise due diligence and transparency in our decision-making process."* The use of the CIHA tool in the Battcorp application is not transparent and it appears to not be justifiable from a planning perspective.

So why was the CIHA tool used for the Battcorp application? The subject lands are not in a residential community, and it will be difficult for the Battcorp apartment towers to become a healthy and vibrant residential community without proper schools, parks, community centres, public transportation etc. This residential development will destabilize a valuable and necessary employment area. Communities are not built on isolated islands surrounded by established employment uses. Do not create problems for tomorrow, instead use the CIHA to continue complementing and building healthy, vibrant residential communities. We kindly ask that you provide assistance to bring transparency to the use of the CIHA for the Battcorp application, and to decline the use of the CIHA tool for this application which lacks the planning justification to use the CIHA tool.

Thank you for your time and consideration.

Yours truly,



Weston Downs Ratepayers Association

Per:

Nadia Magarelli

Co-president, Weston Downs Ratepayers Association

Rose Savage

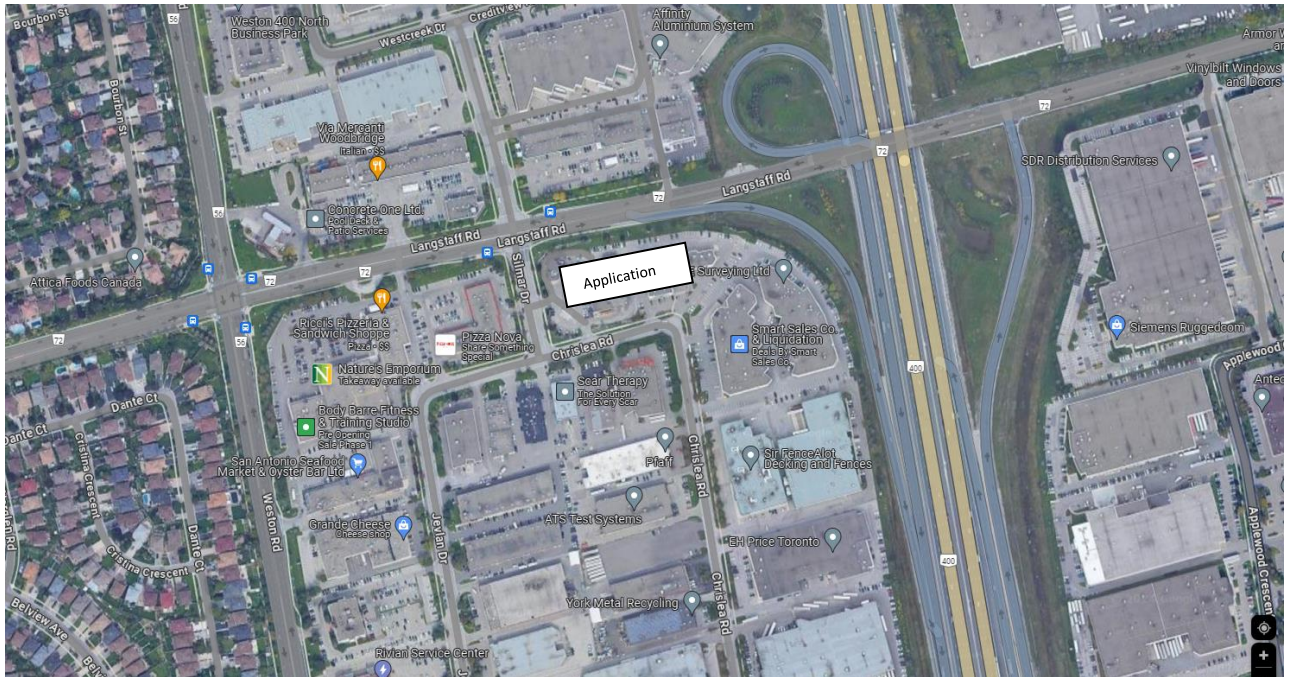
Co-president, Weston Downs Ratepayers Association

Victor Lacaria

Co-president, Weston Downs Ratepayers Association

Appendix 1

Note how close these lands are to the Hwy 400 south onramp.



Appendix 2 and 3 Battcorp.pdf



Appendix 4 Adjacent Employment Lands.pdf



Appendix 5 City of Vaughan Planning saying NO to the conversion, yet it is pushed through during COVID.pdf