BLACKTHORN Development Corp.

Land Development | Land Use Planning | Project Management | Government Relations

DELIVERED VIA EMAIL

October 23, 2025

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

RE: **Written Comments: Draft New Vaughan Official Plan 2025**
Request for Employment Conversion *(Existing Residential Lot)*
7300 & 7370 Martin Grove Road *("Subject Lands")*
City of Vaughan, Region of York

We write on behalf of Martin Grove North Properties Ltd. & Martin Grove South Properties Ltd. being the Registered Owners of lands municipally addressed as 7300 & 7370 Martin Grove Road being lands located on the west side of Martin Grove Road, north of Highway 407, south of Roysun Road and east of Highway 27 *("Subject Lands")*.

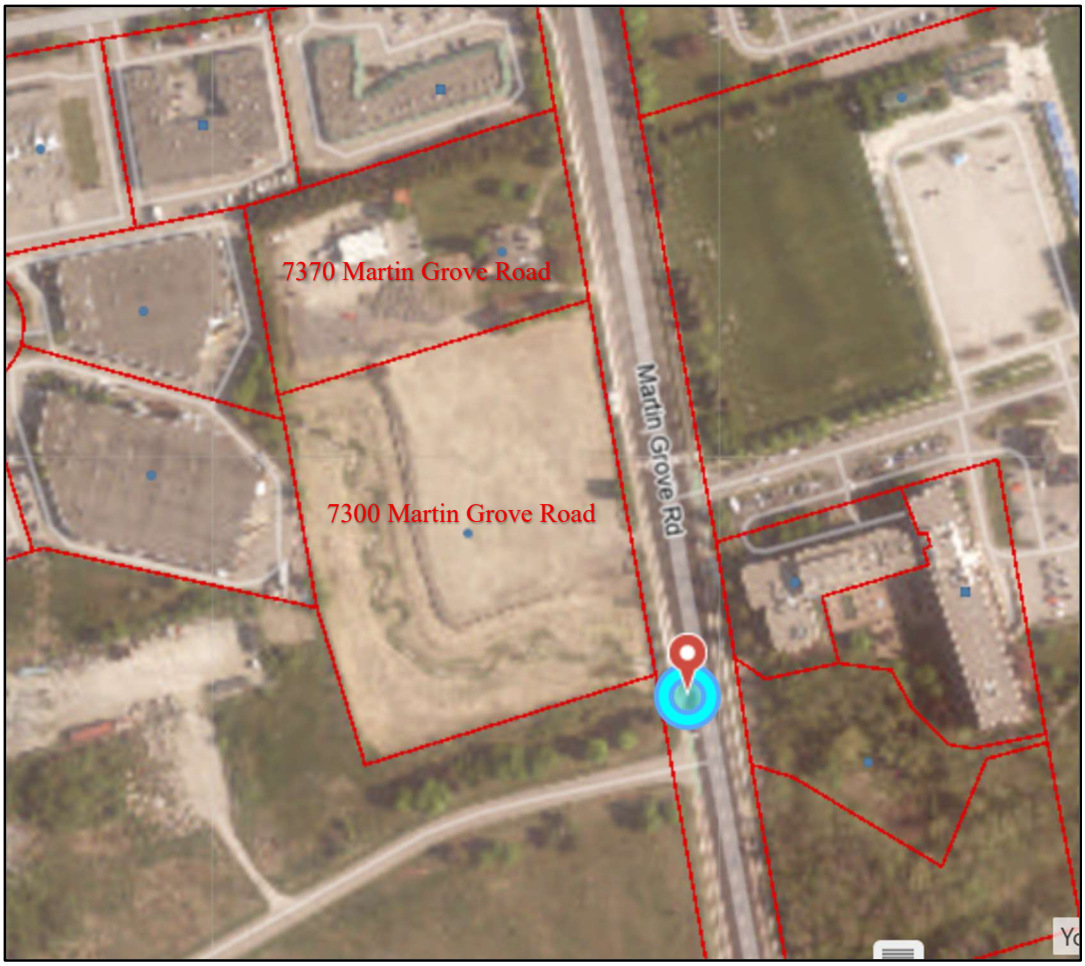
Specifically, for reasons outlined below, we write to request the City revise the *Draft New Vaughan Official Plan 2025* to redesignate the Subject Lands from 'General Employment', 'Prestige Employment' and 'Natural Areas' to 'High-Rise Mixed-Use' and 'Natural Areas', together with a site-specific policy recognizing no Official Plan Amendment will be required to redefine the extent of the 'Natural Areas' designation .

The Subject Lands are legally described as Part of Lot 3, Concession 8 with an approximate Site Area of approximately 3.48 Hectares *(Approx. 8.59 Acres)*.

The 7370 Martin Grove Road lands contain an existing 2-storey brick dwelling together with accessory structures whereas the 7300 Martin Grove Road lands are largely vacant aside from a frame shed.

An existing watercourse on the Subject Lands has been approved and completed for realignment per TRCA Permit No.1086/22/VAUG, thus the request for a site-specific Policy recognizing no Amendment required to redefine the extent of the 'Natural Areas' designation, on the Subject Lands.

<u>Figure 1</u>: Location Map, 7300 & 7370 Martin Grove Road



<u>Source</u>: Region of York Interactive Map

Existing Land Use Policies & Regulations

The Subject Lands are currently designated as 'General Employment,' 'Prestige Employment,' and 'Natural Areas' per the in-effect *City of Vaughan Official Plan*, 2010.

The same designations with revised policies, pertaining to such designations, are proposed per the Draft *City of Vaughan Official Plan*, 2025.

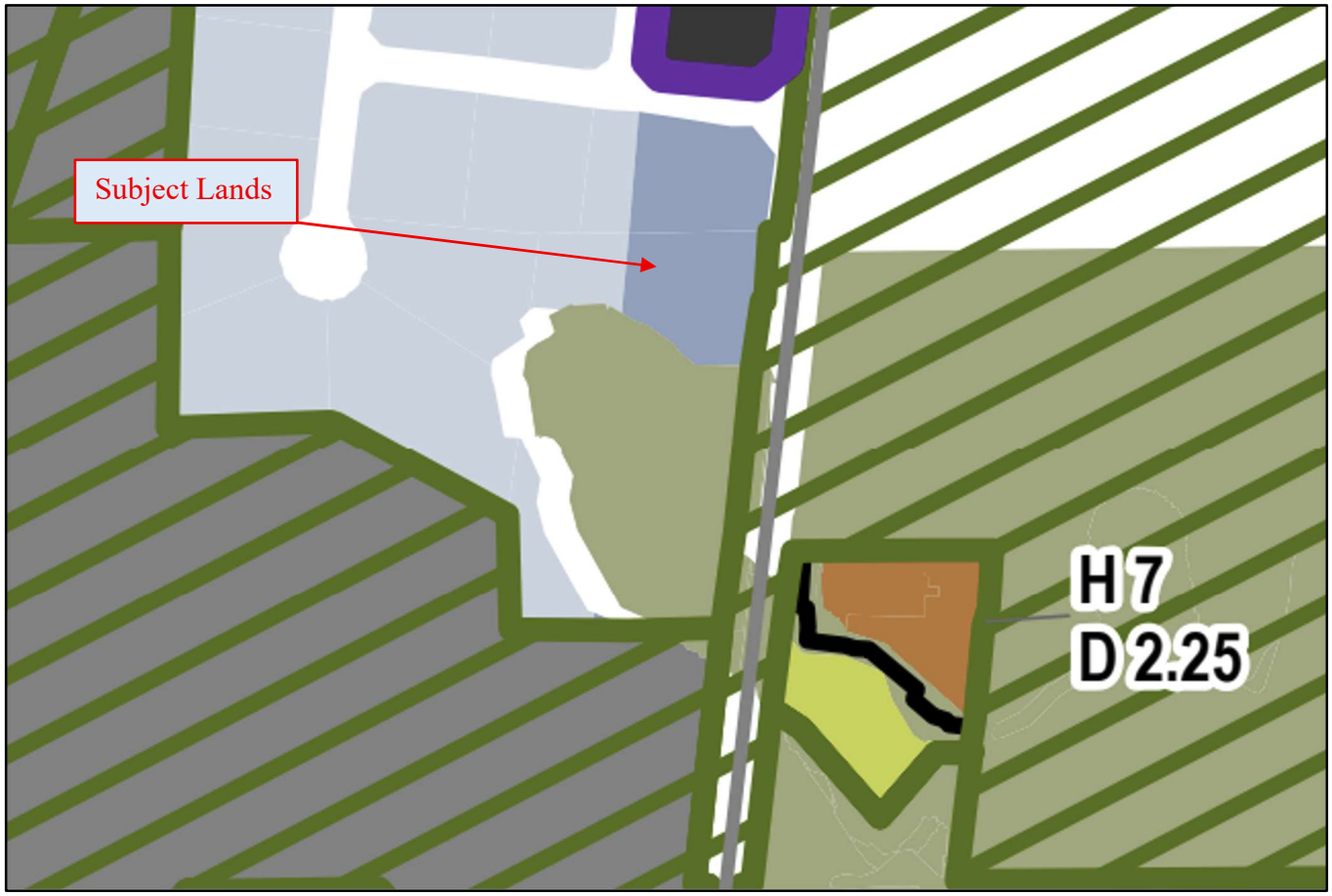
The Subject Lands are Zoned 'Parkway Belt Complimentary Use *(PB-2)*' Zone with the 7370 Martin Grove Road lands being subject to Site Exception No. 331. The noted Site Exception permits the existing Single Detached Dwelling, together with specific provisions regulating the existing use.

Lastly, the Subject Lands are partially located within the Toronto and Region Conservation Authority's Regulated Area.

Draft New City of Vaughan Official Plan 2025

As mentioned, and in accordance with the latest *Draft New City of Vaughan Official Plan 2025* the Subject Lands are proposed to be designated as 'General Employment', 'Prestige Employment', and 'Natural Areas'

Figure 2: New City of Vaughan Official Plan 2025



Source: New City of Vaughan Draft Official Plan, Schedule 13

Request to amend Draft Official Plan Designations & Planning Justification

As mentioned, our is the City revise the *Draft New Vaughan Official Plan 2025* to redesignate the Subject Lands from 'General Employment', 'Prestige Employment' and 'Natural Areas' to

'High-Rise Mixed-Use' and 'Natural Areas,' together with a site-specific policy recognizing no Official Plan Amendment will be required to redefine the extent of the 'Natural Areas' designation.

In accordance with the *Provincial Planning Statement, 2024 (PPS)*, 'Employment Area' is Defined, as follows:

> *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 that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.*

The Subject Lands, while designated through the updated *Region of York Official Plan* to be partly within an 'Employment Area' and despite the PPS being revised, specifically, to redefine the Defined Term for an Employment Area, the City's new Official Plan did not reassess Employment designations but, instead, carried over the outdated designations from the *Region of York Official Plan*.

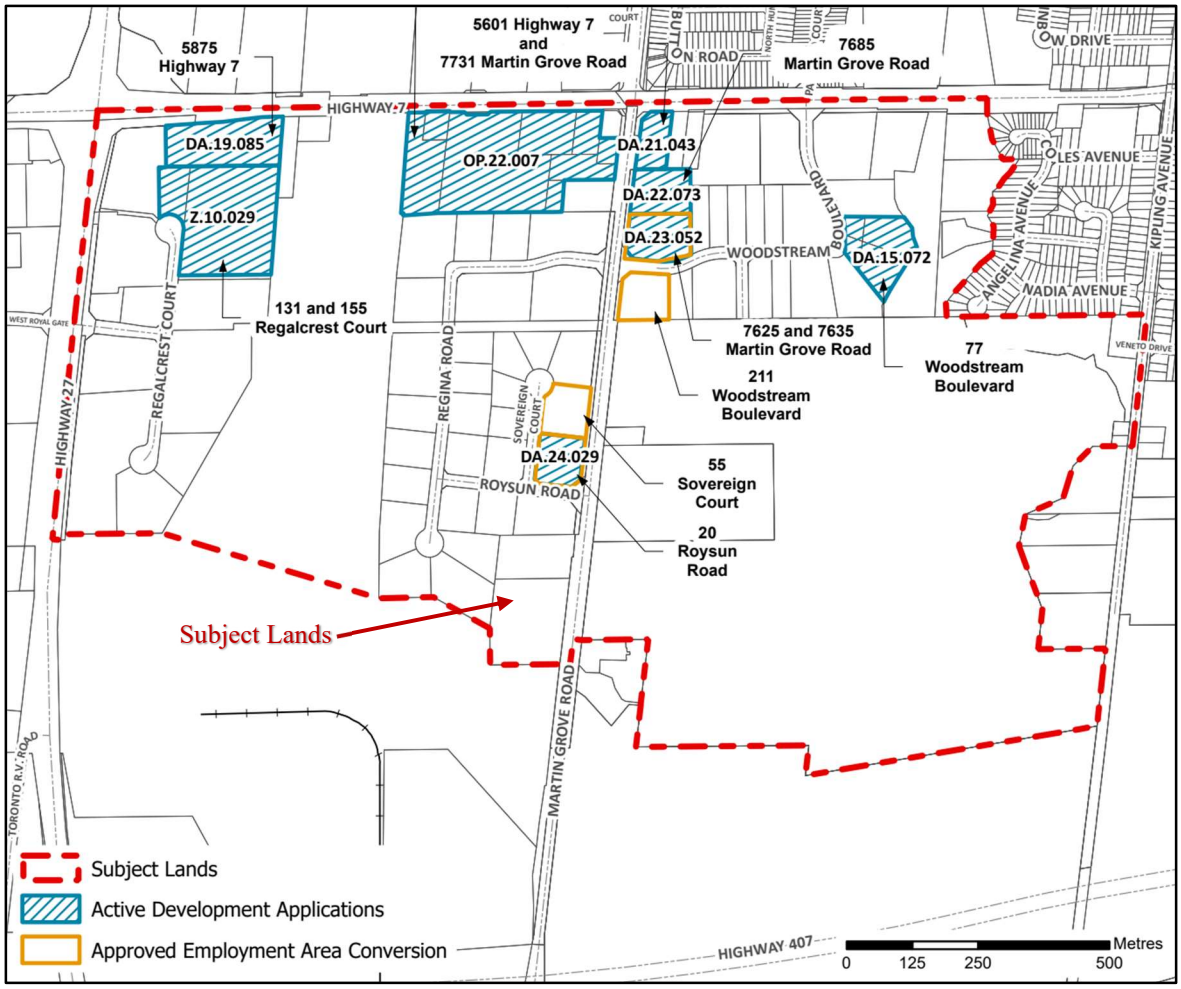
Not reassessing the City's Employment Lands, through the current Official Plan Review and based on the updated PPS is fundamentally inconsistent with Provincial policy wherein the updated Employment Area definition merits a re-examination of the City's Employment Lands and their respective designations.

Further, the Subject Lands are located within an area undergoing land use transition with several, active *Planning Act* applications seeking to develop nearby lands for non-employment uses such as high rise residential and commercial uses.

In fact, the City sought to establish a Special Study Area recognizing the transition of land uses within the immediate area, with the originally proposed Study Area including the Subject Lands.

While Council opted to not establish the Special Study Area and instead deferred site-specific land use issues to be considered through the Application*(s)* Process, clearly there is a need to establish a land use vision for the area and in doing so, a reassessment of employment designations is merited, especially to ensure the avoidance of land use compatibility issues arising with the introduction of sensitive lands uses on nearby lands.

<u>Figure 3</u>: Active *Planning Act* Applications



Source: City of Vaughan

In addition, Section 2.8.2 of the PPS clearly prohibits residential and other sensitive uses within Employment Areas while requiring appropriate transition to adjacent non-employment areas to ensure land use compatibility.

Further, the PPS requires municipalities to assess and update Employment Areas identified in official plans to ensure such a designation is appropriate to the planned function of Employment Areas by means of maintaining land use compatibility.

The Subject Lands, being located within an emerging Community Area with mixed land uses, are not compatibly suited for accommodating general employment uses and are instead, better suited to accommodate future residential or mixed uses.

The PPS also provides for criteria in considering Employment Conversions, as follows:

> *Planning authorities may remove lands from employment areas only where it has been demonstrated that:*
>
> *a) there is an identified need for the removal, and the land is not required for employment area uses over the long term;*
>
> *b) the proposed uses would not negatively impact the overall viability of the employment area by:*
>
> > *1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;*
> >
> > *2. maintaining access to major goods movement facilities and corridors;*
>
> *c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and*
>
> *d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.*

In reviewing the above Employment Conversion criteria, the following is noted, as it pertains to the Subject Lands:

i. Removal of the Subject Lands from the proposed Employment Area designation is needed to ensure land use compatibility with existing and proposed sensitive land uses and existing Natural Features. The Subject Lands represent a minor portion of the overall Employment Area*(s)*, are not required for employment area uses over the long term, nor are suitable to accommodate such a land use.

ii. Removal of the Subject Lands from the proposed Employment Area designation would not impact the planned Employment Area*(s)* uses, with the existing area context consisting of a mixed-use community with emerging residential uses proposed.

iii. Existing infrastructure and public service facilities are available to accommodate the intended mixed-uses for the Subject Lands.

iv. Removing the Subject Lands from the proposed 'Employment Area' designation is considered a minor removal and would not bring the City's Employment Land Base into deficiency.

The above PPS policies are carried over within the *New City of Vaughan Official Plan 2025*, with the following, added Employment Conversion policies, per Section 2.2.4.5 of the proposed Official Plan:

That further to policy 2.2.4.4, where conversions of lands in Employment Areas are proposed, it should be shown the conversion:

a. does not impact the configuration, location, and contiguous nature of the Employment Area;

b. maintains access to major transportation corridors from the Employment Area;

c. does not impact the City's ability to provide a variety of land types and sizes in the Employment Area;

d. does not introduce direct or indirect potential adverse impacts such as odour, noise and other contaminants to future residents or employees;

e. does not create risks to public health and safety.

In reviewing the above 'draft' policies, the is noted, as it pertains to the Subject Lands:

i. Removing the Subject Lands from the proposed 'Employment Area' designation will not impact the configuration, location, and contiguous nature of the overall Employment Area since the Subject Lands are located along Martin Grove Road which merits active uses when considering the emerging land use planning context, consisting of mixed-use development.

ii. Access to major transportation corridors will be maintained despite the redesignation of the Subject Lands.

iii. Removing the Subject Lands from the 'Employment Area' designation does not impact the City's ability to provide a variety of land types and uses within the proposed and larger Employment Area since the Subject Lands will continue to provide a wide range of land uses through a mixed-use format, studied through a subsequent *Planning Act* process.

iv. Removal of the Subject Lands from the 'Employment Area' designation will not introduce direct or indirect potential adverse impacts such as odour, noise, and other contaminants. In fact, introducing general employment uses on the Subject Lands may pose land use compatibility impacts on sensitive uses, proposed or existing within the immediate area.

v. There is no risk to public health and safety by means of removing the Subject Lands from the proposed 'Employment Area' designation. In fact, maintaining the residential use, on the Subject Lands, is within the Public Interest when considering the surrounding and emerging land use character, generally consisting of mixed-use development.

Closing Remarks & Request for Notice of Decision

Based on the, we respectfully request the *New City of Vaughan Official Plan 2025* be revised to remove the portion of the Subject Lands from the 'Employment Area' designation, replacing the same with a 'High-Rise Mixed Use' designation while also providing for a site-specific policy recognizing no Official Plan Amendment will be required to redefine the extent of the 'Natural Areas' designation.

We further request to be provided any Notice of Decision it pertaining to the *New City of Vaughan Official Plan 2025.*

Thank you for the opportunity to comment on the new Official Plan and for Council's consideration of our request.

Your attention regarding our Written Comments and Request is greatly appreciated.

Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,
BLACKTHORN DEVELOPMENT CORP.

Maurizio Rogato, B.U.R.Pl., M.C.I.P., R.P.P.
Principal

Copy:
Client
Mr. Fausto Filipetto, MCIP, RPP, Senior Manager, Policy Planning & Sustainability