January 12, 2026

BY EMAIL Matthew.Meighoo@ontario.ca) **& BY REGULAR MAIL**

Municipal Services Office - Central Ontario
College Park, 16th Floor
777 Bay Street
Toronto, ON
M7A 2J3

RE: Environmental Registry of Ontario – ('ERO' No. 025-1420)
Comments & Modification Requests - Proposed Vaughan Official Plan 2025
Westlake Pipe & Fittings at 101, 131 & 155 Regalcrest Court, et al
City of Vaughan - Our File No. 1711

Dear Mr. Meighoo:

We are the planners of record writing on behalf of Westlake Canada Inc. - 'Westlake Pipe & Fittings' ('Westlake') regarding the Proposed Vaughan Official Plan - Volume 1 ('VOP 2025'). The Ministry of Municipal Affairs & Housing ('MMAH') has received the proposed ('VOP 2025') for a decision, therefore this submission is copied to MMAH for further its consideration through this ERO process.

Westlake is a well-established manufacturing business located at 101, 131 and 155 Regalcrest Court, as well inclusive of its licensed portion of the Hydro Electric Power Corridor ('HEPC'), used for the outside storage of their manufactured pipe products. Please refer to the attached 'Aerial Image' describing Westlake properties located within the south-east of quadrant of Highways 7 and 27.

- Westlake has plans to expand and grow its robust operations at this location in keeping with its extensive thirty-five-year history of manufacturing, warehousing and distributing pipes, fittings and building products for the construction industry.

- Westlake, with its significant work force, serves the regional market from this convenient and accessible location within the city and region.

AERIAL IMAGE - LOCATIONAL CONTEXT

WESTLAKE CANADA INC. O/A WESTLAKE PIPE & FITTINGS



1711_Image1JAN.2026

G/E IMAGE2 025

Legend

- 101, 131 & 155 REGALCREST COURT & NORTHERN & SOUTHERN OUTSIDE STORAGE BLOCKS (LICENCED)
- PARKWAY BELT WEST PLAN AREA

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- Westlake's products are essential to servicing the residential & ICI building products market with manufacturing that supports region-wide housing and related construction activities.

- Westlake's business operations and properties are located within the Vaughan Enterprise Zone ('VEZ' – south), a provincially significant employment area of high industrial output and economic development that achieves the wise use of infrastructure investment, supporting job creation and the Canadian economy.

We continue to seek effective growth management and land use policies that foster Westlake's well-established manufacturing and distribution operations. During the 'VOP 2025' process, we filed written submissions with the City on behalf of Westlake regarding proposed 'employment lands' policies, et al.

THE *PLANNING ACT* & THE PROVINCIAL PLANNING STATEMENT 2024

As a basis for the comments and recommendations herein, please refer to the *Planning Act*, R.S.O. 1990, c. P. 13, as amended, per "area of employment". Planning legislation requires municipalities to use their Official Plan's to create an urban structure comprised of land use designations that support and protect the planned functions of clusters of business and economic uses.

In addition, the Provincial Planning Statement 2024 ('PPS 2024') reads in part under 2.8.2 Employment Areas:

1. *Planning authorities shall plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.*

2. *Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.*

3. Planning authorities shall designate, protect and plan for all *employment areas* in *settlement areas* by:

a) planning for *employment area* uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;

b) prohibiting residential uses, commercial uses, *public service facilities* and other institutional uses;

c) prohibiting retail and office uses that are not associated with the primary employment use;

d) prohibiting other *sensitive land uses* that are not ancillary to uses permitted in the *employment area*; and

e) including an appropriate transition to adjacent non-*employment areas* to ensure land use compatibility and economic viability.

The *Planning Act (*see "area of employment") and the PPS 2024 (see "employment areas") clearly prescribe permitted uses with the purpose of reinforcing the sustainability of existing and proposed industrial businesses, located within the 'employment' areas that comprise the city's 'urban structure'. This prohibits the intrusion of sensitive residential and/or non-compatible land uses within and nearby that would otherwise undermine existing and/or future industrial operations.

THE PURPOSE OF 'SCHEDULE 1 - URBAN STRUCTURE'

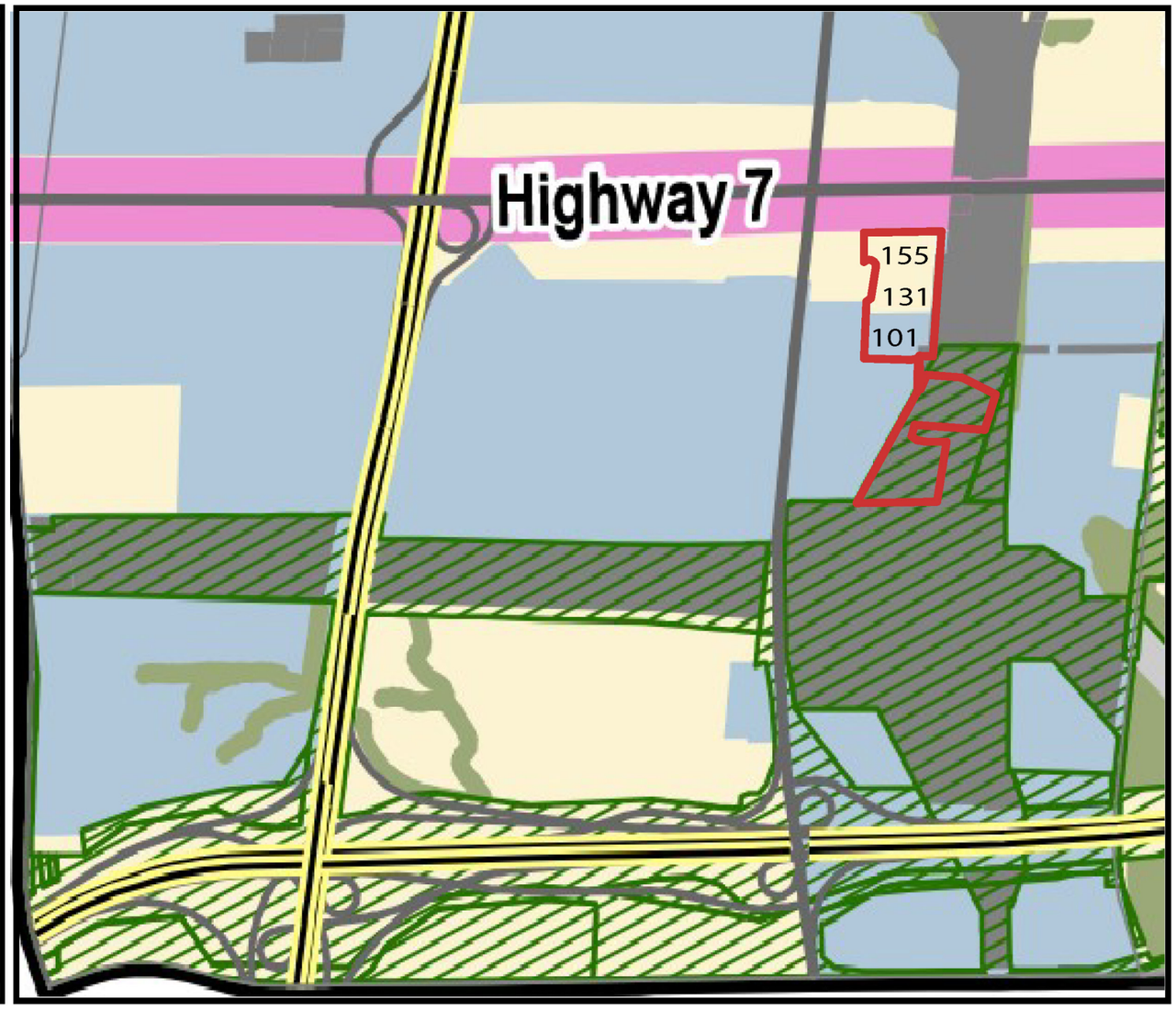
The proposed VOP 2025 'Schedule 1 - Urban Structure' establishes a foundational framework guiding future growth and development decisions. It protects existing and proposed industrial businesses and planned functions per 'employment' areas, setting the basis for 'Schedule 13 - Land Use Designations'.

'Schedule 1 - Urban Structure' now illustrates the 131 and 155 Regalcrest Court lands as "Community Areas". Conversely, an earlier draft of VOP 2025 (January 2025) identified Westlake's property, et al as "Core Employment Areas" consistent with the planning history of these lands, dating back from inception, through OPA 400, and subsequent Official Plans. Please see 'Figure 1 - SCHEDULE 1: Urban Structure Comparisons' which illustrates this inconsistency.

FIGURE 1: SCHEDULE 1: URBAN STRUCTURE COMPARISONS - 'VOP 2025'



JANUARY 2025 - DRAFT 'VOP 2025'



OCTOBER 2025 - PROPOSED 'VOP 2025'

Community Areas

Core Employment Areas

Community Areas

Employment Areas

WESTLAKE PROPERTIES 101, 131 & 155 Regalcrest Court, et al

Westlake
Pipe & Fittings

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The PPS 2024 ("employment areas") clearly prescribes permitted uses (per the 131 and 155 Regalcrest Court lands) reinforcing the sustainability of industrial businesses, prohibiting intrusion of nearby residential and/or non-compatible land uses that may undermine existing and/or future industrial operations.

Protecting established 'Employment Areas' avoids land use compatibility issues, by preventing against sensitive land uses that can weaken and/or undermine proximate industrial planned functions as the following negative effects and/or unintended consequences that may occur:

- *Creates land use conflicts and land use compatibility issues that extend well beyond property boundaries;*
- *Undermines the planned function of existing and viable industrial business operations affecting future investment decisions;*
- *Destabilizes the broader employment area for lands that are at least within 300 m of the property lines, and this distance can extend further;*
- *Requires updating and/or additional 'Environmental Compliance Approvals' (ECAs) and 'Environmental Activity or Sector Registrations' (EASRs) to maintain viable business operations, and with changes in operations;*
- *Results in a narrowing of industrial tenants and operational types;*
- *Creates additional demand and/or competition for on public infrastructure, such as water, wastewater and transportation;*
- *Adds more residential traffic in the vicinity of industrial areas with the potential for conflict and delays;*
- *Results in a loss of valuable manufacturing, distribution, warehousing and administrative jobs and loss of economic development;*
- *Results in a loss of the city's employment tax base, where industry places a much lesser demand on public services than does residential;*
- *Lands converted from industrial to residential uses, rarely, if ever, return to industrial uses, and are removed the City's Employment Land Inventory; and,*
- *Adds additional pressures for 'speculative' employment land conversions.*

In summary, 'Schedule 1 - Urban Structure' establishes "Community Areas" and 'Employment Areas', among others. "Community Areas" may be viewed as supporting and/or encouraging residential, a sensitive land use, as it more broadly applies to the City's 'Urban Structure'. Whereas, "Employment Areas" prohibits residential and similar sensitive land uses so as to protect existing and proposed industrial businesses and planned functions.

'Schedule 1 - Urban Structure' sets the basis for land use designations per Schedule 13 of the proposed VOP 2025.

In addition, PPS 2024, Section 2.8.1 'Supporting a Modern Economy' includes planning for lands for a variety of employment purposes including industrial and manufacturing, among others, while prohibiting sensitive residential land use:

> 2.8.1.3 In addition to policy 3.5, on lands within 300 metres of *employment areas*, *development* shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of employment uses within existing or planned *employment areas*, in accordance with provincial guidelines. (PPS 2024)

In summary, the PPS 2024 establishes that the 131 and 155 Regalcrest Court lands are better comprised as part of an "Employment Areas", as opposed to a "Community Areas", as now prescribed in the proposed VOP 2025, per 'Schedule 1: Urban Structure'.

- **The proposed VOP 2025 'SCHEDULE 1 Urban Structure' applies "Community Areas" to the 131 and 155 Regalcrest Court property and this is not supported. It is recommended that the 131 and 155 Regalcrest Court property be more appropriately comprised within an "Employment Areas" by way of modification to the proposed VOP 2025 'SCHEDULE 1 Urban Structure' as residential land uses are prohibited.**

SCHEDULE 13 – LAND USE DESIGNATIONS & VOP 2025 POLICY TEXT

The proposed VOP 2025, Schedule 13 "Land Use Designations" defines the "area of employment" and "employment area" land use functions, location and permitted uses by way of the "General Employment", "Prestige Employment" and "Non-Residential Mixed Use" land use designations.

- **The 101 Regalcrest Court property is designated "General Employment" and this is supported.**

The 131 and 155 Regalcrest Court property is designated "Non-Residential Mixed Use" prohibiting residential uses, while encouraging a range of employment area functions. Please see 'Figure 2 - SCHEDULE 13: Comparison of Land Use Designations'.

FIGURE 2: SCHEDULE 13: COMPARISON OF LAND USE DESIGNATIONS - 'VOP 2025'



JANUARY 2025 - DRAFT 'VOP 2025'



OCTOBER 2025 - PROPOSED 'VOP 2025'

Westlake Pipe & Fittings

WESTLAKE PROPERTIES 101, 131 & 155 Regalcrest Court, et al

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In this regard all the employment functions of Westlake are protected through a VOP 2010, as amended, Volume 2 - Site Specific Official Plan Amendment 13.58. This protects the manufacturing and warehousing functions, et al of the property until at least November 30, 2040. In due course, it is anticipated VOP 2025 Volume 2 will also be updated accordingly.

- **The 131 and 155 Regalcrest Court property is designated "Non-Residential Mixed Use" and this land use designation is supported as it prohibits residential uses, while encouraging a range of 'Westlake's' employment area functions through VOP 2010, as amended, Volume 2 - Site Specific Official Plan Amendment 13.58.**

'PARKWAY BELT WEST PLAN, 1978, AS AMENDED'

Proposed VOP 2025 needs to confirm that its Schedule 1 'Urban Structure, Schedule 4 'Provincial Plans and Designations' and Schedule 13 'Land Use Designations' represent all lands currently located within the 'Parkway Belt West Plan, 1978', as amended ('PBWP'). Where linear utility corridors exist, but are no longer part of the PBWP, these lands appear designated "Infrastructure and Utilities" per Schedules 1 'Urban Structure' and 13 'Land Use Designations'.

Westlake maintains a long-term lease with Hydro One Networks Inc. for the purpose of 'outdoor storage' of its manufactured pipes and supports proposed VOP 2025 policy *3.2.9 Infrastructure and Utilities* permitting 'outdoor storage' and, reads in part "*...outdoor storage that are Accessory to adjacent land uses, subject to the review/approval of the utility provider.*"

. . . . .

As per protocol, we request to receive the notice of the approval authority's decision regarding VOP 2025 by email to pstewart@cityplan.com and/or by regular mail to address on this letterhead.

We thank you in advance for your consideration of our requests and cooperation.

Yours truly,
Pound & Stewart Associates Limited

Philip Stewart MCIP, RPP
/la 1711ltr_ERO_MMAH _Jan.12.2026

cc. Mr. J. Filipowicz, Executive Director of Policy, Minister of Municipal Affairs and Housing Josef.Filipowicz@ontario.ca

cc. Mr. P. Kelly, Deputy Director of Policy, Minister of Municipal Affairs and Housing Patrick.Kelly4@@ontario.ca

cc. Office of the City Clerk, Adjudicative Services, occservices@vaughan.ca per Mr. T. Coles, City Clerk, City of Vaughan Todd.Coles@vaughan.ca

cc. Mr. F. Filipetto, Senior Manager, Policy Planning, City of Vaughan Fausto.Filipetto@vaughan.ca

cc. Client