WESTON CONSULTING

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
777 Bay Street, 16th Floor
Toronto, ON M7A 2J3

January 29 2026
File 3867

Attn: Matthew Meighoo

RE: 9081 Weston Road, City of Vaughan
City of Vaughan Official Plan 2025 ("VOP 2025")
ERO Number: 025-1420
Ministry Reference Number: 19-OP-246866

1.0 Introduction

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the "**Owner**"), the owner of the land municipally known as 9081 Weston Road in the City of Vaughan (the "**Subject Property**"). On behalf of the Owner, we have been monitoring and participating in the City of Vaughan's Official Plan Review process and submitted written comments in letters dated March 14, 2025 (Attachment 1), June 3, 2025 (Attachment 2), September 29, 2025 (Attachment 3), and December 1, 2025 (Attachment 4), and made an oral submission at the Statutory Public Meeting on June 4, 2025 (Attachment 5) (collectively, the "**Previous Submissions**").

On October 28, 2025, City of Vaughan Council adopted the VOP 2025 in accordance with Section 17(22) of the *Planning Act*. The VOP 2025 establishes a city-wide policy framework to guide growth and development to the year 2051 and includes updated policies for the Vaughan Metropolitan Centre Secondary Plan area and a new Weston 7 Secondary Plan, intended to align with provincial planning direction and legislation. The new VOP 2025 applies to all lands within the municipal boundary of the City of Vaughan. The VOP 2025 has been submitted to the Minister of Municipal Affairs and Housing for approval under Section 17(34) of the *Planning Act.*

This letter has been prepared to inform the Ministry review of VOP 2025 for consistency with applicable provincial land use policies. We request that the enclosed comments and recommendations be implemented in the approved version of VOP 2025.

2.0 Executive Summary

The purpose of this letter is to request modifications to the VOP 2025 to permit a mixed use designation on the Subject Property. It is our opinion that the proposed *Employment Area* category for the Subject Property is not appropriate.

The location of the Subject Property represents an appropriate transition between the low-rise residential neighbourhood to the west of Weston Road and the Vaughan Mills Shopping Centre east of Highway 400 to create a more integrated and complete community with residential and non-residential uses with a mix of densities.

Amendments to the *Planning Act* and the introduction of the Provincial Planning Statement 2024 ("**PPS 2024**") in October 2024 regarding the definitions of "area of employment" / "employment area" and associated land use

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permissions further reinforce our opinions. Limiting the permitted uses on the Subject Property primarily to industrial, manufacturing and warehousing will impede development of the site due to its location between an established residential neighbourhood and the Vaughan Mills Shopping Centre. A mixed use designation is, in our opinion, consistent with the PPS 2024, and it would also be in keeping with the conclusions of the City-commissioned 2009 report titled "Where & How to Grow", which identified the area between Weston Road and Highway 400, south of Rutherford Road, including the Subject Property, as an area suitable and appropriate for residential and mixed use intensification.

We request that the Minster modify VOP 2025 based on the analysis herein to support the development of a complete community, enable the delivery of a variety of housing types and employment opportunities, and support infrastructure investment.

3.0 Context

3.1 Description of Subject Property and Development Block

The Subject Property is located on the east side of Weston Road, south of Rutherford Road, west of Highway 400 and north of the proposed Bass Pro Mills Drive extension. It is approximately 10 hectares in area and has approximately 200 metres of frontage along Weston Road (Figure 1). The Subject Property is generally vacant except for temporary buildings for Garden Centre/Landscape Supply uses located along Weston Road.

The Subject Property forms part of larger development block being coordinated with adjacent landowners as part of a master planned development (the "**Development Block**"). The development block is approximately 54.9 hectares (135.70 acres) and has frontage along Weston Road, Rutherford Road and Highway 400, as well as the future extension of Bass Pro Mills Drive.

3.2 Surrounding Land Uses

The Subject Property is located in proximity to retail/commercial uses to the north, industrial/commercial employment uses and outdoor commercial storage to the south, the Vaughan Mills Shopping Centre to the east across Highway 400, and low-density residential uses comprised primarily of single-detached dwellings to the west across Weston Road. Specific land uses in the vicinity of the Subject Property include:

North: Retail and commercial uses are located north of the Subject Property along the north and south sides of Rutherford Road, including grocery stores, financial institutions, a gas station, a medical centre, and various food establishments. North of Rutherford Road is a low-rise residential neighbourhood consisting of one to two-storey single-detached dwellings.

South: Immediately south of the Subject Property is vacant land that extends generally towards commercial and employment uses along Langstaff Road.

East: Highway 400 is located east of the Subject Property. East of Highway 400 is the Vaughan Mills Shopping Centre. High-rise residential / mixed use buildings are located further east along Jane Street.

West: A mature low-rise residential neighbourhood consisting of one to two-storey single detached dwellings is located west of the Subject Property on the opposite side of

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Weston Road. The residential neighbourhood extends generally west towards the Boyd Conservation Park.

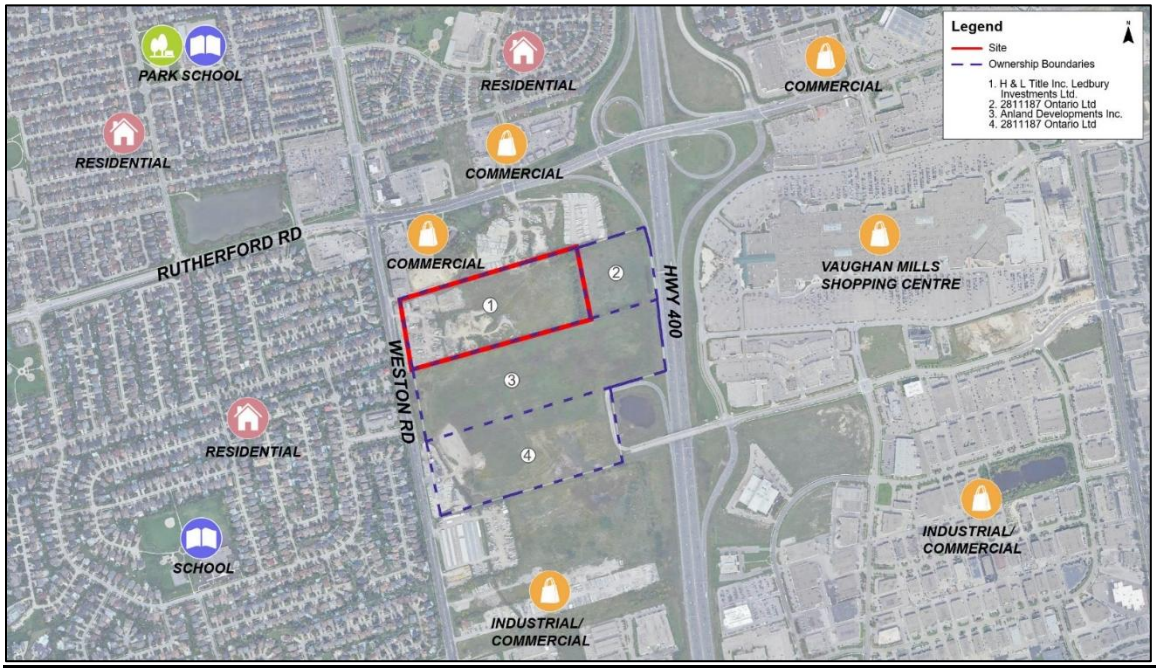


Figure 1: Subject Property and Surrounding Uses

3.3 Vaughan Official Plan, 2010

The Vaughan Official Plan 2010 ("**VOP 2010**") identifies the Subject Property within the *Employment Areas* according to Schedule 1 (Urban Structure). The Subject Property is not subject to a land use designation according to Schedule 13 (Land Use) because it is within the Vaughan Mills Centre Secondary Plan (the "**VMCSP**"). The Subject Property is designated *Prestige Office Employment* and *Prestige Employment* according to Schedule C (Land Use Designation) of the VMCSP.

4.0 Background

4.1 Where & How to Grow, 2009

In June 2009, a report entitled *Where & How to Grow*, prepared by Urban Strategies on behalf of the City (Attachment 6) (the "**Report**"), was released which provided a detailed analysis of Vaughan's population and employment forecasts to 2031, and how the City could be expected to meet those forecasts. The Report was undertaken to inform the City's Official Plan Review process leading to the adoption of the VOP 2010. It established a number of conclusions that were intended to support decision-making in the preparation of draft urban structure and land use designation maps for the VOP 2010, which were released in Fall 2009.

The Report identified this area as a focus for residential and mixed-use intensification and estimated that approximately 2,863 residential units and 6,443 people could be accommodated on the Subject Property and

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adjacent lands and the lands north of Rutherford Road west of Highway 400. Specifically, with respect to the Subject Property and adjacent lands, the report states "*The west side of Highway 400 south of Rutherford Road has the most potential in the Opportunity Area as it is mostly unbuilt. The lands are currently designated employment lands and while the assumed mix would promote office and pedestrian related retail, significant residential development could be introduced here*."

This recommendation was intended to form the basis of the Urban Structure map of the VOP 2010 and was reflected in the October 2009 draft Urban Structure Map, which proposed to designate the majority of the Subject Property and adjacent lands as primarily *Neighbourhoods* with only a very small portion of the lands abutting Highway 400 identified as *Employment*. Later drafts of the VOP 2010 removed the *Neighbourhoods* designation from the Subject Property and adjacent lands and proposed a full employment area designation.

4.2 VOP 2010 and Vaughan Mills Secondary Plan 2014

The VOP 2010 was adopted by City Council on September 7, 2010 and was endorsed with modifications by York Region on June 28, 2012, following the filing of numerous appeals of the VOP 2010 to the OMB, including an appeal by the Owner. In 2012, the City of Vaughan initiated the planning process for the VMCSP to provide a planning framework and develop appropriate land use and urban design policies and designations for the study area to the 2031 planning horizon. The VMCSP is generally bounded by Rutherford Road to the north, Weston Road to the west, Bass Pro Mills Drive to the south and Jane Street to the east, together with some lands east of Jane Street and south of Rutherford Road. A draft of the VMCSP was released on May 22, 2013 and a revised draft was released in February 2014.

The Owner and the owners of adjacent lands actively participated in the Secondary Plan process, including making a number of written and oral submissions objecting to and providing feedback on the proposed Plan. The submissions outlined fundamental concerns with the proposed Secondary Plan, including that the Plan lacked meaningful linkage between the lands on either side of the highway and that permissions for a greater range and mix of uses should be permitted on the west side of the highway, including residential uses.

March 18, 2014, City Council adopted Amendment Number 2 to the VOP 2010 (OPA 2), which established the VMCSP. The VMCSP was subsequently approved by York Region on July 11, 2014, with modifications.

The Owner and the owners of adjacent lands appealed the VMCSP to the former Ontario Municipal Board in July 2014. The appeals were filed on the basis that, among other reasons, the approved Secondary Plan inappropriately identifies the lands west of Highway 400 as the "Vaughan Mills Centre Business District" and limits the permitted uses to a restricted range of employment uses; fails to recognize the potential for these lands to appropriately accommodate mixed-use development including residential uses.

4.3 OLT Phase 1, 2021

Phase 1 of the Ontario Land Tribunal (OLT) hearing took place in 2021 to determine the general land use designations and Phase 2, which is pending, is intended to determine the appropriate policies for the specific land use designations. The OLT issued an interim decision on Phase 1 of the hearing in 2021, and did not grant the proposed redesignation for mixed-use development, but determined that the City's employment projection for the lands west of Highway 400 was too aggressive and not achievable. Since the time of that interim decision, there have been significant legislative and policy changes regarding employment areas at the provincial level, as reflected in amendments to the Planning Act, the PPS 2024 and the elimination of the Growth Plan for the

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Greater Golden Horseshoe, all of which occurred in October 2024.

5.0 VOP 2025 Previous Submissions

On behalf of the Owner, we have actively participated in the latest City of Vaughan Official Plan Review process and provided comments in our Previous Submissions. Generally, our comments and requests regarding the VOP 2025 have been consistent throughout the Previous Submissions and we continue to be of the opinion that VOP 2025 should be revised. Our review and requests are summarized below.

5.1 Urban Structure and Land Use Designation

Urban Structure

Schedule 1 (Urban Structure) of VOP 2025 locates the Subject Property within an *Employment Area*, which are intended to be reserved for industrial, manufacturing, warehousing and related uses, including research and development and ancillary retail and office uses. In our opinion, the Employment Area category is not appropriate. Limiting the permitted uses primarily to industrial, manufacturing and warehousing will impede development due the context of the location between an established residential neighbourhood and the Vaughan Mills Shopping Centre. We further note that the Subject Property and adjacent lands have had employment designations for several decades and yet the lands have remained largely vacant during that time.

Schedule 1 of VOP 2025 identifies the Vaughan Mills Shopping Centre, which is across Highway 400 from the Subject Property, as a Strategic Growth Area. The VOP 2025 establishes a hierarchy of Strategic Growth Areas based on density, building height and intensity of use. According to Policy 2.4.1.1, it is the policy of Council that Strategic Growth Areas shall:

a. *have the highest rate of new residential growth and accommodate most of the forecasted residential growth to support the 57% Intensification target;*
b. *support Major Office, Major Institutional, and Retail Commercial uses; and*
c. *facilitate the Development of a mix of uses and appropriate densities to support high levels of existing or planned transit and Active Transportation.*

Schedule 1B (Strategic Growth Areas) of VOP 2025 identifies the Vaughan Mills Shopping Centre and surrounding lands as a *Primary Centre* and, according to Policy 2.2.1.1, *Primary Centres* are *nodes of predominantly mixed-use High-Rise Buildings and Mid-Rise Buildings, developed at an intensity that is supportive of transit but less than the Vaughan Metropolitan Centre*. Policy 2.4.3.2 states that it is the policy of Council that Primary Centres shall be planned to:

a. *evolve as distinct places of major activity around planned subway stations, Higher Order Transit, and existing regional shopping destinations;*
b. *develop with a mix of housing types and tenures, including housing suitable for seniors and families with children and Affordable Housing;*
c. *include a mix of non-residential uses, including Retail Commercial, office, institutional, Community Facilities, and Human and Social Services intended to serve both the local population and Vaughan as a whole, and attract activity throughout the day;*
d. *develop at densities supportive of planned public transit;*
e. *be transit-oriented, pedestrian-friendly places and include a variety of built forms, such as Mid-Rise Buildings and High-Rise Buildings;*

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f. *have a fine-grain Multi-Modal transportation network suitable for pedestrians and cyclists, with appropriate internal links and links to the surrounding Community Areas which may take the form of sidewalks and/or Greenways;*
g. *include an appropriate amount of well-designed public open spaces appropriate for the local context, including City-owned parks;*
h. *encourage a pedestrian-friendly built form by locating active uses at grade; and*
i. *be designed and developed to implement the appropriate transition of built form, density, and land use to surrounding Community Areas, and/or be Compatible with adjacent Employment Areas.*



Figure 2: Schedule 1 of VOP 2025



Figure 3: Schedule 1B of VOP 2025

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In our opinion, the Employment Area category is not appropriate for the Subject Property and adjacent lands, as these lands represent a transitional area between an established low-rise residential neighbourhood and the Vaughan Mills Shopping Centre. Lands within the Employment Area are reserved for industrial, manufacturing, warehouse and related uses, including research and development and ancillary retail and office uses. Stand alone commercial uses, including retail and office uses that are not associated with manufacturing or warehousing uses, are not permitted in areas of employment. Limiting the permitted uses primarily to industrial, manufacturing and warehousing will impede development of the Subject Property due to its location between a *Primary Centre* to the east and an established residential neighbourhood to the west.

As outlined in our Previous Submissions, we request the Subject Property be redesignated to a mixed use category to support an appropriate development pattern that will create an integrated and complete community.

Land Use Designation

Schedule 13 (Land Use Designations) of VOP 2025 identifies the Subject Property within the VMCSP and subject to Section 11.7 in Volume 2 of the Official Plan. The VMCSP proposes to designate the Subject Property *Prestige Office Employment* and *Prestige Employment*. Although the VMCSP remains subject to appeals at the OLT for the lands west of Highway 400, it seeks to create a complete and well-integrated mixed-use urban centre that promotes connectivity throughout the area, including across Highway 400. This is further supported by the future Bass Pro Mills Drive extension located south of the Subject Property.



Figure 4: Schedule 13 of VOP 2025

In our opinion, the *Prestige Office Employment* and *Prestige Employment* designations are not appropriate, particularly in the context of current provincial policy. Our Previous Submissions requested that Schedule 13 of VOP 2025 be revised to designate the Subject Property *Mid Rise Mixed Use* and *High Rise Mixed Use* to provide

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appropriate transition between the low-rise residential neighbourhood to the west and the Vaughan Mills Shopping Centre east of Highway 400 to create a more integrated and complete community with residential and non-residential uses with a mix of densities. Further to our requested changes to Schedules 1 and 1B, we request that Schedule 13 be modified to designate the Subject Property *Mid Rise Mixed Use* (immediately east of Weston Road) and *High Rise Mixed Use*.

5.2 Natural Heritage Framework

Schedule 2 (Natural Heritage Network) of VOP 2025 designates a portion of the Subject Property as an area "To be Determined Through Future Studies". According to Policy 2.7.3.17, this identification corresponds with undeveloped lands with the potential to:

a. *enhance form and function of Watercourses;*
b. *maintain and/or enhance water flow;*
c. *improve Wildlife Habitat value;*
d. *improve species movement and/or dispersal;*
e. *provide restoration options;*
f. *improve overall connectivity value; and/or*
g. *improve the likelihood of maintaining self-sustaining vegetation*

Policies 2.7.3.17 to 2.7.3.21 of VOP 2025 establish direction for further study of these areas through an Environmental Impact Study to permit development and/or site alteration. While we generally support the intent of these policies to refine Core Features based on the findings of technical studies, we request VOP 2025 be amended to clarify that an Official Plan Amendment would not be required if an Environmental Impact Study determines the feature is not significant.

Furthermore, it should be noted that Schedule 2 of the Draft VOP does not accurately reflect the existing condition of the Subject Property, as a portion of Black Creek currently traverses north-south along the westerly boundary of the Subject Property.



Figure 5: Schedule 2 of VOP 2025

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5.3 Road Classification

Schedules 9A, 9B and 9C of VOP 2025 depict a proposed road network through the Subject Property which consists of two north-south Minor Collector Streets and one east-west Local Street. In our opinion, the final configuration of the road network should be informed by the outcome of the outstanding OLT matter or through a development application, excluding the extension of Bass Pro Mills Drive. We request these Schedules be modified to remove the conceptual road network.

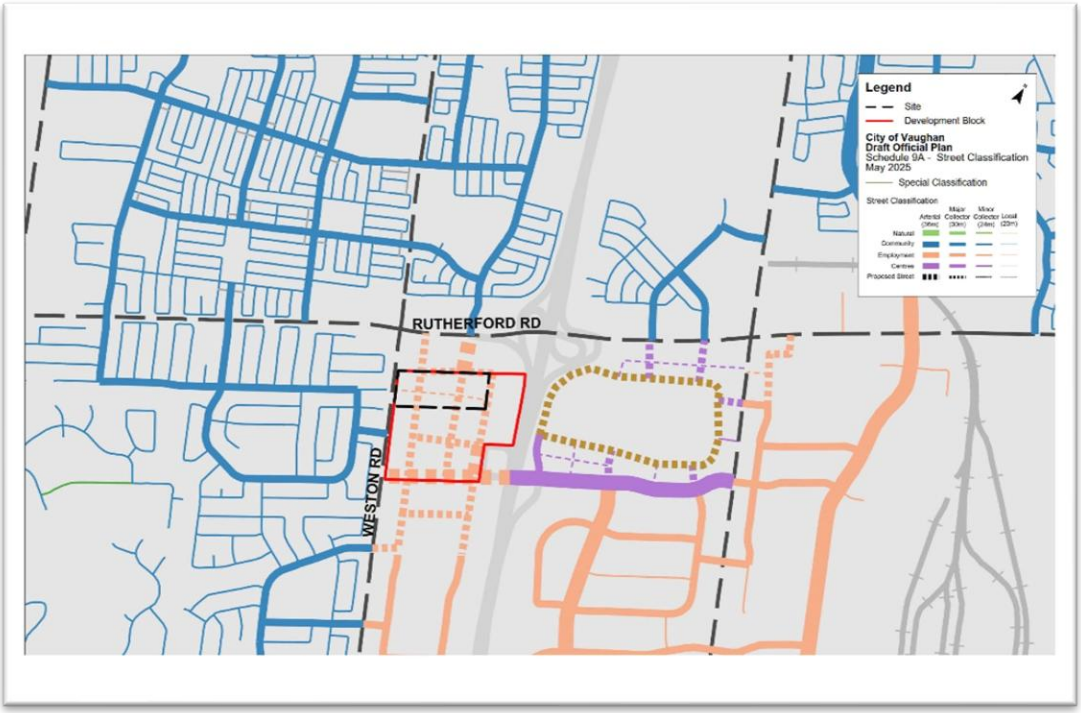


Figure 6: Schedule 9A of VOP 2025

6.0 Provincial Legislative and Policy Changes

Bill 97, the *Helping Homebuyers, Protecting Tenants Act, 2023* amended the *Planning Act* by changing the definition of "area of employment" to narrow the scope of uses permitted in areas of employment to exclude institutional and commercial uses, including retail and office uses that are not associated with a primary business and economic use. Employment Areas were redefined under the *Planning Act* as clusters of business and economic uses, manufacturing uses, warehousing uses, including research and development in connection with manufacturing and goods movement, associated retail and office uses, and ancillary facilities. The PPS 2024 also prohibits residential and commercial uses within employment areas, as well as public service facilities and institutional uses. The amended definition of "area of employment" in the Planning Act took effect on October 20, 2024, coinciding with the effective date of the PPS 2024.

Although VOP 2025 identifies the Subject Property within an *Employment Area* and the VMCSP proposes to designate it *Prestige Office Employment* and *Prestige Employment*, it is our opinion that the *Employment Area* category for the Subject Property is not appropriate, particularly given the amendments to the *Planning Act* and the PPS 2024 regarding the definitions of "area of employment" / "employment area" and associated land use permissions. Limiting the permitted uses primarily to industrial, manufacturing and warehousing will impede

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development of the site due to its location between an established low-rise residential neighbourhood and the Vaughan Mills Shopping Centre.

7.0 Summary of Requests and Justification

Based on the analysis contained in this letter and the Previous Submissions, it is our opinion that the Subject Property and adjacent lands should be designated for mixed use (residential / commercial) development to support the Province's goals to increase the housing supply and housing options, provide a mix of land uses, and support future growth in areas served by existing and planned infrastructure to optimize those investments.

In our opinion, the Subject Property is ideally situated for medium- and high-density mixed use development due to the low-rise residential neighbourhood to the west and Highway 400 and the Vaughan Mills Shopping Centre to the east. Introducing higher densities and a mix of compatible uses represents an appropriate transition that will enable the development of an integrated and complete community, including parks, community uses and amenities. Our requested modifications to VOP 2025 with respect to the Subject Property to support these objectives are:

- Modify Schedule 1 to include the Subject Property and adjacent lands within a Strategic Growth Area;
- Modify Schedule 1B to extend the Primary Centre designation to include the Subject Property and adjacent lands;
- Modify Schedule 2 to remove the depiction of the area "To Be Determined Through Future Studies" and to clarify that an Official Plan Amendment would not be required if an Environmental Impact Study determines the feature is not significant;
- Modify Schedules 9A, 9B and 9C to remove the conceptual road pattern for the Subject Property and adjacent lands; and,
- Modify Schedule 13 to designate the Subject Property *Mid Rise Mixed Use* and *High Rise Mixed Use.*

8.0 Conclusion

We thank you for your consideration of this submission and we request to be notified of any decision(s) regarding VOP 2025. If you have any questions regarding the above comments, please contact the undersigned.

Yours truly,

Weston Consulting
Per:



Darrin Cohen, MCIP, RPP
Senior Planner

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c. H&L Title Inc. and Ledbury Investments Ltd.
Mark Flowers, Davies Howe LLP
Ryan Guetter, Weston Consulting

Attachments:

1. Comments on the Draft Vaughan Official Plan 2025, March 14, 2025
2. Comments on the Draft Vaughan Official Plan, June 3, 2025
3. Comments on the Draft Vaughan Official Plan, September 29, 2025
4. Comments on City Initiated Official Plan Amendment, December 1, 2025
5. Statutory Public Meeting Presentation, June 4, 2025
6. Where and How to Grow: Directions on Future Growth in the City of Vaughan to 2031, June 2009

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