LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

Steven C. Ferri*
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By E-Mail to: Matthew.Meighoo@ontario.ca

January 30, 2026

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

Attention: Matthew Meighoo

Dear Mr. Meighoo,

RE: Approval of Vaughan Official Plan, 2025 ("VOP 2025")
ERO #: 025-1420
Ministry Reference #: 19-OP-246866
Submission on behalf of CRH Canada Group Inc. & GIP Paving Inc.

Who We Are

We represent CRH Canada Group Inc. ("**CRH**") and GIP Paving Inc. ("**GIP**"), (collectively, the "**Clients**").

Our Clients are the owners of lands within the larger Maple Industrial Area, bounded by Teston Road to the north, the CN Rail line to the east, McNaughton Road to the south, and Keele Street to the west ("**Maple Industrial Area**"). The Maple Industrial Area is home to numerous industrial operations, including our Clients' Class II and Class III operations and numerous other industrial facilities operating under environmental compliance approvals.

We have engaged with the City on numerous occasions regarding this matter. Our correspondences to the City are attached hereto as **Attachment "A"**.

Our Concern: The City proposes to designate a majority of the "Maple Industrial Area" for non-employment land use designations effectively removing a majority of the Maple Industrial Area from an Employment Area. This is not consistent with Policies 2.8.1(3), 2.8.2(1) to 2.8.2(5), and 4.5.2(4) of the Provincial Planning Statement 2024 ("PPS") & is not good planning.

The Maple Industrial Area in its entirety is considered an Employment Area under the PPS, 2024

Lands within the Maple Industrial Area have been used for employment uses since the 1950s and continue to be used for established uses that fall within the definition of Employment Area under the PPS. The Maple Industrial Area was recently formally designated as an Employment Area (part of the Highway 400 North Employment Area, as identified on Appendix 1 – Employment Areas Zones and Densities of the *York Region Official Plan 2022*) through the approval of the *York Region Official Plan* in 2022 ("**YROP 2022"**) and the Municipal Comprehensive Review which underpinned same.

City's recent adoption of an amendment to the YROP on January 27, 2026 confirmed that the Maple Industrial Area is an Employment Area.



Figure 1. Map 1A YROP 2022

The VOP 2025 Effectively Eliminates the Maple Industrial Area from an Employment Area

The VOP 2025 designates a majority of the "Maple Industrial Area" for non-employment land use designations effectively removing a majority of the Maple Industrial Area from an Employment Area. This is not consistent with Policies 2.8.1(3), 2.8.2(1) to 2.8.2(5), and 4.5.2(4) of the PPS and is not good planning.

The introduction of non-employment land use permissions within the Maple Industrial Area is subject to PPS Policy 2.8.2.(5); however, no studies were undertaken by the City to support the removal of lands from the Employment Area, including demonstrating that:

a) there is an identified need for the removal and the lands are not needed for Employment Area uses over the long term;
b) the removal will not negatively impact the overall viability of the Employment Area – including both the Maple Industrial Area and larger Employment Area to the east; and
c) the City has sufficient Employment Lands to accommodate projected employment growth to the horizon of the Official Plan.

On behalf of our Clients, we write to object to the removal of the Maple Industrial Area from an Employment Area, as set out in the VOP 2025, in the strongest of terms. In my over sixteen years of legal practice in the field of municipal and land use planning law, I have not seen a clearer violation of provincial plans and policies. If the Province were to approve the VOP 2025 as-adopted, it would be an affront to the PPS and to land use planning in Ontario more generally. As you will become evident in your review of the following sections, our Clients have acted in good faith at all times to protect the Employment Area, whereas the City has continued a sustained campaign to introduce uses into the Maple Industrial Area which would destabilise it.

It is incumbent upon the Province to take swift action to ensure the long-term viability of the Maple Industrial Area in the interest of ensuring a prosperous and successful Ontario that supports a strong and competitive economy. The City is the most significant industrial market in York Region, which accounts for approximately 61% of York Region's total industrial inventory; meaning, it is has more industrial inventory than all other York Region municipalities combined. This threat to the industrial engine of Ontario must be addressed.

Our Proposed Solution: Maintaining the Maple Industrial Area as an Employment Area

We ask that the Province modify the as-adopted VOP 2025 as follows:

(i) Modify Volume 1, Schedule 1 (Urban Structure) to designate the Maple Industrial Area, in its entirety as “Employment Areas”; and

(ii) Revise Volume 2, Maple Industry Area Area Specific Policy to reflect the text and Schedule set out in our proposed modifications.

Our proposed modifications are attached as **Attachment “B”** hereto.

It is our respectful submission that the foregoing modifications are necessary to ensure consistency of the as adopted VOP 2025 to the YROP 2022, the PPS, and other applicable provincial guidelines.

Maintaining the Employment Area designation for the entirety of the Maple Industrial Area is good planning as it: (i) protects Mineral Aggregate Operations from development and activities that would preclude or hinder their expansion or continued use; and (ii) ensures that the Employment Area policies in the PPS will continue to apply.

History: Our Clients have a Long History of Working with the City to Protect Employment Uses within the Maple Industrial Area, including multiple settlements before the Ontario Land Tribunal.

Please find a chronology detailing our Clients' involvement in this matter attached as **Attachment "C"** hereto.

As you will note, our client's involvement in this matter has resulted in two appeals launched by our Clients on land use planning grounds and two settlements, in both of which the city reversed course, both of which were approved by the Ontario Land Tribunal.

The most recent settlement with the City, which was effected in 2025, was in respect of our Clients' appeal of the City's Comprehensive Zoning By-law. The settlement explicitly removed the types of uses now contemplated to be permitted by the VOP 2025 and ensured that only uses permitted in Employment Areas by provincial policy are permitted within the Maple Industrial Area.

Our Clients' ongoing efforts to communicate their issues with the VOP 2025 culminated in City staff agreeing, in writing, to present for Council's consideration a request for a Ministerial modification to the VOP 2025 post-adoption, which would designate the Maple Industrial Area as an Employment area in its entirety. Despite the foregoing written agreement, this request was never brought before Council. This written agreement is found at **Attachment "D"**.

We kindly request a meeting with provincial staff to discuss the foregoing.

If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

LOOPSTRA NIXON LLP



Per: Steven C. Ferri

ATTACHMENT "A"

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

Steven C. Ferri*
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Tel: 416-748-4752

BY EMAIL (opmanager@vaughan.ca)

March 7, 2025

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

Attention: Fausto Filipetto, Project Manager

Re: New Draft Vaughan Official Plan 2025
10351, 10431 and 10445, 10475 Keele Street, Vaughan

Loopstra Nixon represents CRH Canada Group Inc. and GIP Paving Inc., the owners of several parcels of existing employment lands located at 10351, 10431 and 10445, 10475 Keele Street, Vaughan (the "Subject Lands"), located north of McNaughton Road, east of Keele Street, south of Teston Road and west of the former Keele Valley Landfill Site. The Subject Lands are subject to Area Specific Policy 12.14 within the City of Vaughan Official Plan – Volume 2, as approved at the Ontario Land Tribunal on March 16, 2021.



Figure 1. Subject Lands

It is our understanding that the City of Vaughan (the "City") is undertaking an Official Plan update and that a new draft Official Plan 2025 (the "VOP 2025") has been released for review and comment. We further understand that the City intends to hold a Statutory Public Meeting to receive feedback on the new draft VOP 2025 on May 6th, 2025.

Background / Chronology

Historic Use as Employment Area

The Subject Lands have continued to be occupied by employment uses including industrial, manufacturing, mineral aggregate operations, concrete production, and storage facilities since at least the 1960's, and these uses remain active, economically viable, and competitive.

The Subject Lands form part of a broader area designated, zoned, and used for employment uses, including existing large outdoor storage facilities, transportation depots, plastics fabricators, manufacturing, auto repair, concrete manufacturing, etc.

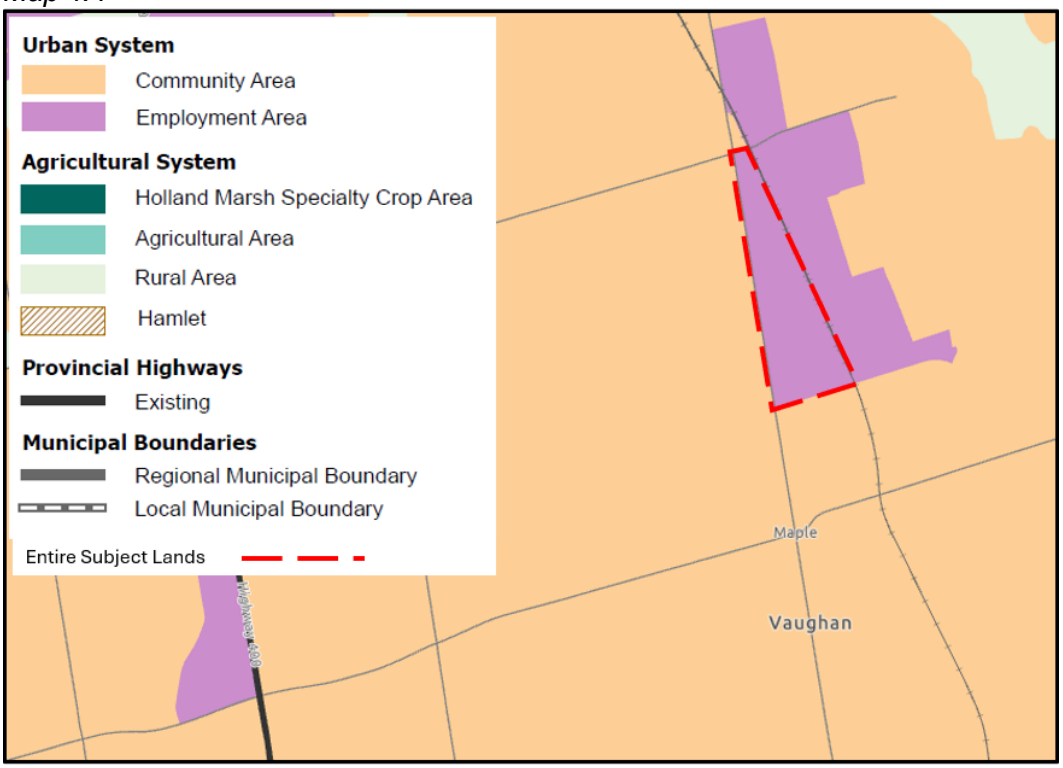
Vaughan Official Plan 2010

During the previous Vaughan Official Plan update in 2010 (VOP 2010), the Subject Lands and the broader employment triangle referred to as the "Maple Industrial Area" in the VOP 2010, were proposed to be redesignated from Industrial and Prestige Industrial to Community Areas, including Low-Rise Residential and Low-Rise Mixed Use. Following adoption of the updated VOP 2010 by Vaughan Council, appeals were filed which resulted in a settlement supported by Vaughan Council and staff, wherein the Subject Lands and the Maple Industrial Area were designated to reflect the ongoing industrial / manufacturing uses as Employment Lands and policies were introduced to ensure the long-term protection of these employment uses from the incremental incursion of sensitive lands uses.

2022 York Region Official Plan

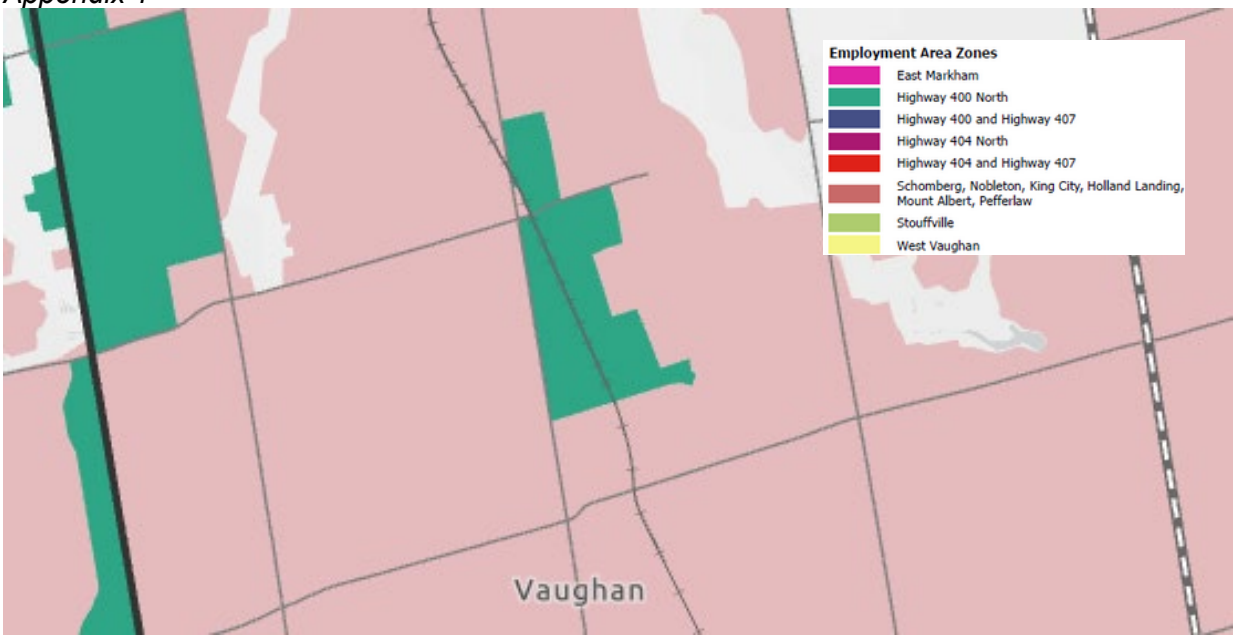
The 2022 York Region Official Plan (approved by the Minister of Municipal Affairs and Housing in November 2022) (the "YROP") designated the Subject Lands as well as the Maple Industrial Are as an "Employment Area", as shown on Map 1A – Land Use Designations.

Map 1A



Further, the YROP includes the Subject Lands within the Highway 400 North Employment Area Zone on Appendix 1.

Appendix 1



The Employment Area polices of the York Region Official Plan provide among other things:

> 4.3.3 That *Employment Areas,* as shown on Map 1A, shall be designated in local official plans for employment uses for clusters of business and economic activities including, manufacturing, warehousing, industrial, offices, and associated retail and ancillary facilities.
>
> 4.3.4 That *Employment Areas* be protected from the encroachment of *sensitive uses* to ensure their success in attracting future business and job opportunities.
>
> 4.3.12 That local municipalities shall identify *core employment areas* and *supporting employment areas* in local official plans, within the *Employment Areas* as shown on *Map 1A*.
>
> 4.3.20 That the conversion of lands within *Employment Areas* identified in *Map 1A* to non-employment uses shall only be considered through a *municipal comprehensive review*. The change of *core employment area* to supporting *Employment Area* through a local official plan amendment shall require Regional approval.

By designating the Subject Lands “Employment Area”, York Region clearly demonstrated its intent to provide for and protect the entire employment area indicated on the map extract below,

including the application of regional and provincial policy protections relating to employment conversions and the encroachment of sensitive lands uses.

Draft Vaughan Official Plan 2025

We have reviewed the Draft Vaughan Official Plan 2025 and have concerns respecting the applicable policies. Our issues include whether the applicable policies are consistent with the policies of the Provincial Policy statement respecting the protection of mineral aggregate operations, the protection of employment areas, the protection of major facilities, and compatibility of uses. Our issues also include whether the proposed policies conform with the aforesaid policies of the YROP.

Given the foregoing, we would welcome an opportunity to review the policy intent and implications with City staff to avoid the potential for conflict or misinterpretation moving forward.

Finally, on behalf of the Owner, we request notice of any future communication or decisions regarding the Vaughan Official Plan Review.

I trust the above is satisfactory, however should you have any questions or concerns regarding this correspondence please do not hesitate to contact the undersigned.

Yours truly,

LOOPSTRA NIXON LLP



Per: Steven C. Ferri
Partner

CC: Stephanie Spencer <SSpencer@gipi.com>

Monique Seibert <mseibert@gipi.com>

Jessica Ferri <jessica.ferri@ca.crh.com>

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WITHOUT PREJUDICE, PRIVILEGED, AND CONFIDENTIAL

BY EMAIL (candace.tashos@vaughan.ca; opmanager@vaughan.ca**)**

September 7, 2025

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

Attn: Fausto Filipetto, Project Manager & Candace Tashos, Senior Legal Counsel

Dear Mr. Filipetto and Ms. Tashos;

RE: CITY OF VAUGHAN OFFICIAL PLAN REVIEW
DETAILED COMMENT SUBMISSION
CRH CANADA GROUP INC. & GREEN INFRASTRUCTURE PARTNERS INC.

On behalf of CRH Canada Group Inc. ("**CRH**") and Green Infrastructure Partners Inc. ("**GIP**"), we are submitting comments on the draft City of Vaughan Official Plan (dated January 2025) and the Employment Land Use Review (2023) which are currently available on the City of Vaughan web site for review.

CRH and GIP are the registered owners of the lands known municipally as 10351, and 10475 Keele Street, Vaughan, which collectively comprise an area of approximately 9 hectares (22.4 acres) ("**Subject Lands**").

The Subject Lands are located within a larger tract of lands located north of McNaughton Road, east of Keele Street, south of Teston Road, and west of the CN rail line and former Keele Valley Landfill Site ("**Maple Industrial Area"**). The Maple Industrial Area is currently occupied by industrial uses including, but not limited to aggregate operations, concrete producers, a lumber yard, a roof truss manufacturing company, and self-storage facilities. The location of the Maple Industrial Area is shown on **Figure 1** and are subject

to Area Specific Policy 12.14. The Subject Lands are identified as “General Employment” on Figure 1.

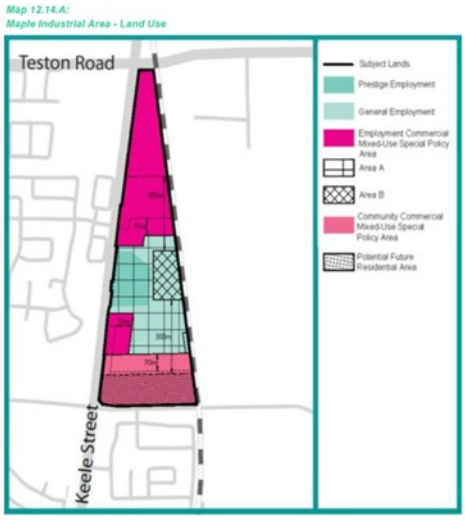


Figure 1

DESCRIPTION OF EXISTING EMPLOYMENT USES

CRH is one of the country’s largest vertically integrated building material and construction companies, including providing materials and services for Canada’s largest infrastructure projects, needed to support growth. In this location, the CRH property is approximately 4.8 ha (11.9 acres) in area and has three main uses/operations: (i) a concrete batching plant operation, (ii) recycling of used concrete and (iii) an aggregate transfer station. Outdoor storage of aggregate materials (and recycled concrete) is necessary.

A concrete batching operation has existed on CRH’s lands for approximately 50 years. The estimated number of full-time jobs generated by the CRH operation at this location is 40. CRH employs over 3,000 people and its main headquarters is located in the City of Vaughan.

GIP specializes in the production of asphalt and in heavy construction (sewer and water mains, road construction and hydro works). In this location, GIP’s property is approximately 4.2 ha (10.5 acres) in area and is mainly used for an asphalt plant operation. Outdoor storage of aggregate materials (including recycled asphalt and concrete) is necessary. An asphalt plant operation has existed on this site for over 35 years. Asphalt produced at GIP’s site is mainly used for provincial road projects / maintenance and some municipal road projects. A small percentage may also be used for ICI (industrial commercial institutional) projects.

The Subject Lands are strategically located for their individual operations. Both companies want to ensure that the legal status of these operations continue on the Subject Lands for many more years.

In the case of the asphalt and concrete operations, locating these operations is highly strategic as the product has a time sensitive shelf life (asphalt/concrete must be off loaded 1.5 hr from loading) and must be close to market (i.e. areas being developed).

BACKGROUND RE LEGISLATIVE AND POLICY CHANGES:

1. Changes to the *Planning Act* and the Provincial Planning Statement ("**PPS**") (effective October 20, 2024) have significantly narrowed the definition of "*employment areas*" to primarily focus on manufacturing, warehousing, and associated uses, while excluding standalone office, commercial, and institutional uses, as follows

    - Planning Act Definition (*summarized*):

        ""area of employment" means…(2) <u>not any of the following uses</u>:

        i. Institutional uses.
        ii. Commercial uses, including retail and office uses not associated with an *employment area* use."

    - PPS 2024 Definition:

        "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***.*

2. Several policies of the PPS 2024, including Policies 2.8.2(3) and 2.8.2(4), direct that municipalities protect and plan *employment areas* that are located in proximity to major goods movement facilities and corridors.

    a. Policy 2.8.2(3) requires planning authorities to designate, protect and plan for *employment areas* in *settlement areas* over the long-term for uses that require those locations and prohibit sensitive land uses in employment

areas and provide for an appropriate transition to adjacent non-*employment areas*.

b. Policy 2.8.2(4) states:

"Planning authorities shall assess and update *employment area*s identified in official plans to ensure that this designation is appropriate to the planned function of *employment areas*. In planning for employment areas, planning authorities shall maintain land use compatibility between *sensitive land uses* and *employment areas* in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas."

3. The *Planning Act,* at section 1(1.1) and 1(1.2), provides a transition provision that would authorize municipalities to implement Official Plan policies that would permit the continuation of uses excluded by paragraph 2 of the new definition (commercial and institutional uses), in e*mployment areas*, so long as the use was lawfully established before the definition came into force. Implementing such Official Plan policies would ensure that parcels of land with uses not included in the new definition can continue to be deemed as an "area of employment" and, as such, would remain subject to employment area conversion policies.

Amendments to the *Planning Act* under Bill 97 introduced a corresponding definition for "area of employment," which will come into force on the same date as the PPS 2024, being October 20, 2024.

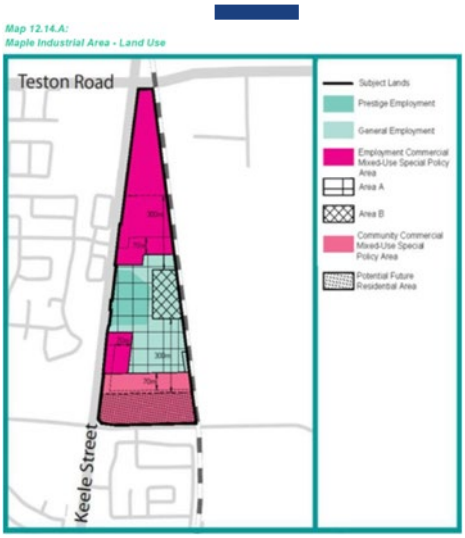
This transition policy is captured in Policy 2.2.4.2 of the Vaughan's Draft OP 2025.

SUBJECT LANDS – IN-EFFECT POLICY:

4. As per the in-effect Vaughan Official Plan ("**VOP**"), the Maple Industrial Area:

a. Includes lands designated as "Community Commercial Mixed-Use Special Policy Area", which, pursuant to policy 2.2.4.2, do not "constitute the City's "employment area" land supply as defined in the Growth Plan and PPS" and pursuant to policy 12.14.2.5 these lands are "not an employment area designation as per policy 2.2.4.2".

b. Permits uses such as Office (standalone), Retail (standalone), and Cultural and Entertainment Uses (standalone), which uses are explicitly excluded from the definition of "area of employment" pursuant to the *Planning Act*.



5. Following the VOP coming into effect for the Maple Industrial Area, the York Region Official Plan ("**YROP**") was updated (June 2022) following a Municipal Comprehensive Review process. The YROP was d approved by the Province in November 2022. In the YROP, the Maple Industrial Area is designated in its entirety as Employment Areas on Map 1(A) and is encompassed with the larger Employment Area east of the rail corridor).



Figure 2

6. The Employment Area designation was made at the request of the City of Vaughan through its members of Regional Council.

7. According to the PPS 2024 Policy 2.8.2(4), through this OP Review, the City is required to assess and update *employment areas* identified in its official plan to ensure that its designation is appropriate to the planned function of *employment areas*.

City's Proposed Draft Transition Policies:

8. The City provided proposed transition policies on a confidential and without prejudice basis that are being considered. It is our understanding that the City intends to exclude the Maple Industrial Area (as well as other secondary plan areas or areas

with site or area specific policies) from the application of the VOP 2025 (subject to Area Specific Policy) and to review / address the policies separately at a later date.

9. It is also our understanding that the City intends to repeal the employment area policies and maps in the YROP.

Issues:

10. **Issue 1: An update of the City's Official Plan should not have the effect of converting the Maple Industrial Area from Employment Area to a non-employment designation and should not have the effect of removing all of the protective policies the PPS provided to the CRH and GIP industrial uses at the time the YROP was approved.**

    The repeal of the YROP as it applies to the Subject Lands, and in particular the employment area designation and policies, combined with the designations and land use permissions in the VOP applicable to the Maple Industrial Area, which include non-employment uses, as well as the aforesaid changes to the *Planning Act* and PPS, would have the effect of converting the Subject Lands to non-employment and would remove all of the protective policies the PPS provided at the time the YROP was approved. We understand this to be inadvertent.

11. **Issue 2: City of Vaughan Employment Land Use Review.**

    Several background studies related to the Draft OP were undertaken that the Draft OP Review relies on, including an Employment Land Use Review prepared by Watson and dated April 2023.

    The Employment Land Use Review undertaken by Watson in support of the VOP 2025 did not consider the designation of the Maple Industrial Area as an Employment Area in the YROP and assumed, at the outset, that these were non-employment lands. This is a factual error given the YROP designation of the Maple Industrial Area.

REQUEST:

12. In consideration of the foregoing, we request the following revisions be made to the proposed draft transition policies and incorporated into the By-law or any other relevant Instrument that will ultimately authorize approval of the Official Plan, as follows:

    "It is the Policy of Council:

1.4.2.1 That on approval of this Plan, pursuant to By-law XX, VOP 2010 and the YROP 2022 are repealed, save and except (and until such time as those portions are repealed and replaced pursuant to policies 1.4.2.2 and 1.4.2.3):

a. Volume 2 of VOP 2010 remains in force for the lands shown on Schedule 14A – Areas Subject to Secondary Plans, Schedule 14B – Areas Subject to Area Specific Plans and Schedule 14C – Areas Subject to Site Specific Plans, in Volume 1 of VOP 2010, save and except only the following:

i. the "Weston Road and Highway 7" Required Secondary Plan Area shown on Schedule 14A which is repealed;

ii. the "Vaughan Metropolitan Centre" area and Secondary Plan shown on Schedule 14A, together with Section 11.1.1.11 and Section 11.12 of Volume 2 of the VOP 2010 which are repealed; and

iii. despite 1.4.2.1 (a)(ii) the site-specific policies in the Vaughan Metropolitan Centre Secondary Plan set out in section 9.3 of Section 11.12 of Volume 2 of VOP 2010 remain in force for the lands to which they apply together with any portions of Section 11.12 of Volume 2 of VOP 2010 required for interpretation and implementation of those site-specific policies;

iv. despite anything to the contrary, the entirety of the "Maple Industrial Area" shown on Schedule 12.14A shall be deemed to be an "Employment Area" as shown on Schedule 1 and only those uses permitted in the definition of "area of employment" in paragraph 2 of Subsection 1(1) of the *Planning Act* shall be permitted. Pursuant to subsections 1 (1.1) and (1.2) of the *Planning Act*. Uses legally existing in the Maple Industrial Area that are excluded from the definition of "area of employment" in paragraph 2 of Subsection 1(1) of the *Planning Act*, are authorized to continue so long as the use has been lawfully established on the parcel of land before October 20, 2024.

b. any portions of Volume 1 of VOP 2010 required for interpretation and implementation of:

i. any approvals of applications or appeals in process pursuant to policies 1.4.2.4 (i), (ii) and 1.4.2.5; and
ii. those portions of Volume 2 of VOP 2010 which remain in effect pursuant to policy 1.4.2.1 (a);

c. any policies in respect of highways and public transit rights-of-way and related infrastructure, Map 10 (Rapid Transit Network), and Map 11 (Street Network) of the YROP 2022 required for interpretation and implementation of:

   i. any approvals of applications or appeals in process pursuant to policies 1.4.2.4(i), (ii) and 1.4.2.5; and
   ii. those portions of Volume 2 of VOP 2010 which remain in effect pursuant to policy 1.4.2.1 (a);

d. For greater certainty, a reference to the policies or schedules of Volume 1 of VOP 2010 in any **Secondary Plan**, area-specific or site-specific plan in Volume 2 of VOP 2010 or in an approval arising from an application or appeal in process pursuant to policies 1.4.2.4 (i), (ii) and 1.4.2.5 is a reference to Volume 1 of VOP 2010 as it read immediately before it was repealed.

1.4.2.2 That over time the remainder of Volumes 1 and 2 of VOP 2010 may be repealed as updated or replacement policies are adopted. To that end, the City may amend this Plan to incorporate policies and schedules corresponding, and updated as appropriate, to the policies and schedules of Volume 2 of VOP 2010 for the lands shown on Schedule 14A – Areas Subject to Secondary Plans, Schedule 14B – Areas Subject to Area Specific Plans and Schedule 14C – Areas Subject to Site Specific Plans.

1.4.2.3 That upon the incorporation of policies and schedules into this Plan, as set out in Policy 1.4.2.2, the corresponding **Secondary Plan**, area-specific plan, or site-specific plan in Volume 2 of the VOP 2010 shall be contemporaneously repealed, together with any portions of Volume 1 of the VOP 2010 and the YROP 2022 which remained in force for the purpose of interpretation of those repealed Volume 2 VOP 2010 plans".

Applications and Appeals in Process

It is the policy of Council:

1.4.2.4 That development applications:

   i. submitted prior to the date this Plan is adopted (including any appeals of such development applications) shall not be subject to this Plan unless they have been deemed incomplete, and shall be reviewed and assessed under the appropriate Official Plan policies and schedules prior to this Plan;
   ii. deemed complete from the date this Plan is adopted to the day prior to this Plan being approved (including any appeals of such

development applications) shall not be subject to this Plan and shall be reviewed and assessed under the appropriate Official Plan policies and schedules prior to this Plan; and

iii. which are not within Policy 1.4.2.4 (i) or (ii) shall be subject to the policies and schedules of this Plan, unless the lands are subject to VOP 2010 pursuant to Policy 1.4.2.1, in which case the development applications shall be reviewed and assessed under the appropriate VOP 2010 and YROP 2022 policies and schedules.

1.4.2.5 Applications under the *Planning Act* or the *Condominium Act*, or Block Plan applications, required to implement an approved Official Plan Amendment application that was reviewed and assessed pursuant to Policy 1.4.2.4 (i) and (ii) shall also be reviewed and assessed under the appropriate Official Plan policies and schedules prior to this Plan.

1.4.2.6 Despite Policies 1.4.2.4 (i), (ii) and 1.4.2.5, while the review and assessment of the merits of such applications or appeals shall not be subject to this Plan, where such applications or appeals are to be approved, for administrative convenience, where practicable the form of such approvals may be in the form of an amendment to this Plan. Where that is not practicable, then the approval will remain subject to the appropriate prior Official Plan policies and schedules, until the City has amended this Plan to incorporate or update that approval.

Further, the entirety of the Highway 400 North Employment Area, as designated in the YROP, should be afforded similar protections and in particular, the General Employment Lands in the Keele Valley Landfill Area (12.3.1 of VOP 2010, Volume 2). Otherwise, the City is required to demonstrate that the tests of PPS Policy 2.3.2.5 have been met to remove lands from employment areas.

Please do not hesitate to reach out if you have any questions.

Yours very truly,

LOOPSTRA NIXON LLP



Per: Steven C. Ferri

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

Steven C. Ferri*
*Steven C. Ferri Professional Corporation
Email: sferri@LN.law
Tel: 416-748-4752

WITHOUT PREJUDICE

BY EMAIL (max.rubin@vaughan.ca)

October 1, 2025

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

Attn: Max Rubin, Legal Counsel

Dear Mr. Rubin;

RE: CITY OF VAUGHAN OFFICIAL PLAN, 2025
CONFIRMATION OF AGREEMENT
CRH CANADA GROUP INC. & GREEN INFRASTRUCTURE PARTNERS INC.

On behalf of CRH Canada Group Inc. ("**CRH**") and Green Infrastructure Partners Inc. ("**GIP**"), (collectively, the "**Owners**") we are writing to confirm our understanding of the City of Vaughan's ("**City**") proposed course of action to address the concerns raised by the Owners respecting the current draft of the City of Vaughan Official Plan 2025, as set out in correspondence dated September 7, 2025 and September 17, 2025.

As you are aware, the Owners are the registered owners of the lands known municipally as 10351, and 10475 Keele Street, Vaughan, which collectively comprise an area of approximately 9 hectares (22.4 acres) ("**Subject Lands**").

The Subject Lands are located within a larger tract of lands located north of McNaughton Road, east of Keele Street, south of Teston Road, and west of the CN rail line and former Keele Valley Landfill Site ("**Maple Industrial Area"**). The Maple Industrial Area is currently occupied by industrial uses including, but not limited to aggregate operations, concrete producers, a lumber yard, a roof truss manufacturing company, a waste transfer facility, and self-storage facilities. The Maple Industrial Area is a designated Employment Area pursuant to the York Region Official Plan.

Through a recent Ontario Land Tribunal hearing, the comprehensive zoning by-law was approved for the Maple Industrial Area, which zoning by-law does not permit any uses excluded from the definition of Area of Employment pursuant to the *Planning Act* and Employment Areas pursuant to the Provincial Policy Statement ("**PPS**").

The City and the Owners have been in ongoing discussions since at least May of 2025 regarding the Draft City of Vaughan Official Plan, 2025 ("**VOP 2025**") and its potential impact on the Maple Industrial Area.

We write to confirm the content of those discussions and the City's proposal to address the concerns raised by the Owners:

- The City agreed that the Maple Industrial Area is an "Employment Area" pursuant to the Planning Act and the PPS given the designation of same in the York Region Official Plan ("**YROP**") and should remain as an "Employment Area";

- The City acknowledged that the combined effect of the repeal of the YROP and the policies of the VOP 2025 may be the re-designation of the Maple Industrial Area to something other than an "Employment Area" designation, constituting a conversion ("**Conversion**");

- The City acknowledged that the Conversion was unintended;

- The City advised that it intends to ensure the continued designation of the Maple Industrial Area as an "Employment Area";

- The City advised that the continued designation of the Maple Industrial Area as an "Employment Area" will be achieved by recommending to Council that it approve a revision to the VOP 2025 ("**Revision**"), which would be sent to the Minister of Municipal Affairs and Housing with a request that the Revision be approved as part of the Approval of the VOP 2025, in advance of the repeal of the YROP;

- The Revision, if approved, would have the effect of including the current special policy area policy 12.14 in the VOP 2025, with modifications only to:

    - Designate the entirety of the Maple Industrial Area as Employment or Prestige Employment;

    - Remove uses that are not included in an 'Area of Employment' pursuant to the *Planning Act* and the PPS; and,

- Permit the continuation of uses that are not included in an 'Area of Employment' pursuant to the *Planning Act* and the PPS.

- The Owners have provided a draft 'Revision' for the City's consideration;

- The City will work with the Owners to finalize the Revision prior to consideration by Council;

- The Revision will be put to Council with a recommendation from staff in November/December of 2025; and

- The City will request the Minister of Municipal Affairs and Housing approve the Revision as part of the pproval of the VOP 2025 in December 2025/January 2026.

I can confirm that the Owners are in agreement with the City's proposed course of action to address their concerns and are ready, willing, and able to meet with the City and provide any assistance necessary.

Please do not hesitate to reach out if you have any questions.

Yours very truly,

LOOPSTRA NIXON LLP



Per: Steven C. Ferri

LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

Steven C. Ferri*
*Steven C. Ferri Professional Corporation
Email: sferri@LN.law
Tel: 416-748-4752

BY EMAIL (council@vaughan.ca)

December 2, 2025

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

Attn: City of Vaughan Council

Dear Members of Council,

RE: ITEM 4.4 - CITY-INITIATED MODIFICATIONS TO VOLUME 2 OF THE ADOPTED VAUGHAN OFFICIAL PLAN 2025
CRH CANADA GROUP INC. & GREEN INFRASTRUCTURE PARTNERS INC.

Who We Are

We represent CRH Canada Group Inc. ("**CRH**") and Green Infrastructure Partners Inc. ("**GIP**"), (collectively, the "**Clients**"). CRH is one of the country's largest vertically integrated building material and construction companies, which includes subsidiaries such as Dufferin Aggregate and Dufferin Concrete. GIP (formed pursuant to the amalgamation with GFL Infrastructure Inc. and Ground Force Environmental Corp.) is one of Canada's largest and most diversified infrastructure companies offering vertically integrated solutions for public and private projects.

Our Clients are the owners of lands within the larger Maple Industrial Area, bounded by Teston Road to the north, the CN Rail line to the east, McNaughton Road to the south, and Keele Street to the west ("**Maple Industrial Area**"). As you are aware, the Maple Industrial Area is home to numerous industrial operations, including our Clients' Class II and Class III operations and numerous other companies operating under environmental compliance approvals.

We write with respect to the proposed City-Initiated Modifications to Volume 2 of the adopted Vaughan Official Plan, 2025 ("**VOP 2025**").

As you are likely aware, our Clients have been engaged with the City for over a decade to ensure that the employment uses in the Maple Industrial Area are adequately

protected. This has resulted in two appeals launched by our Clients and two settlements with the City.

The most recent settlement with the City was in respect of our Clients' appeal of Vaughan's Comprehensive Zoning By-law. **The settlement explicitly removed the types of uses now contemplated to be permitted by the city-initiated modifications to Volume 2 and ensured that only uses permitted in Employment Areas by provincial policy are permitted within the Maple Industrial Area.** This settlement was approved by the Ontario Land Tribunal only a few months ago and was supported by the expert land use planning evidence of a City planner.

The Maple Industrial Area is Currently a Designated Employment Area

The Maple Industrial Area is designated as an Employment Area (part of the Highway 400 North Employment Area, as identified on Appendix 1 – Employment Areas Zones and Densities of the York Region Official Plan 2022) in the York Region Official, 2022 ("**YROP 2022**"). Please see Figure 1 below. This fact was confirmed through drafts of the as adopted VOP 2025, which identified the entirety of the Maple Industrial Area as an Employment Area up to September 2025. Please see Figure 2 below.



Figure 1. Map 1A YROP 2022

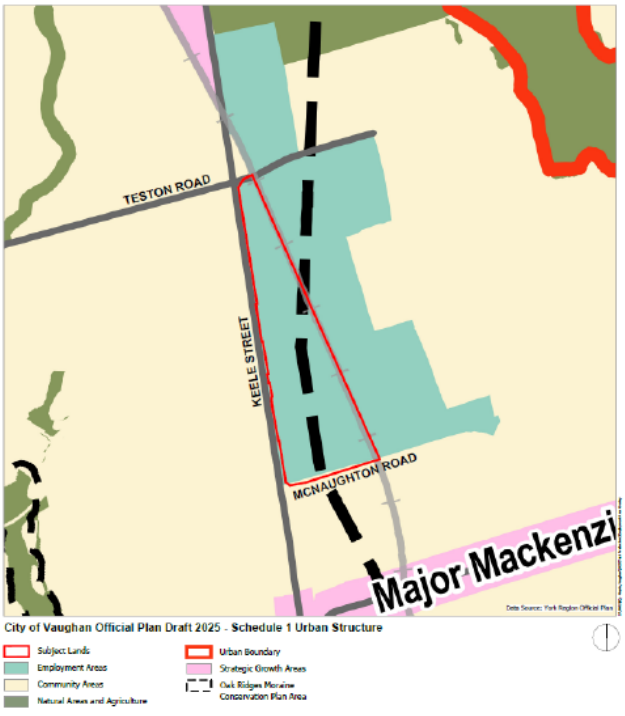


Figure 2. Schedule 1 VOP 2025

The fact that the Maple Industrial Area is an Employment Area is also confirmed in the December 2nd staff report from Vince Musacchio on several occasions, where it is clearly noted that the purpose of the Staff Proposed Modifications (as defined below) are "to update area-specific plans and site-specific policies from Volume 2 of the Vaughan Official Plan 2010 (VOP 2010) for the lands located within the Employment Area" [Emphasis added].

The designation of the Maple Industrial Area as an Employment Area was a result of the Municipal Comprehensive Review which underpinned the adoption of the YROP 2022 by York Regional Council and the approval of same by the Province of Ontario.

The designation of the Maple Industrial Area as an Employment Area in the YYROP 2022, followed the adoption of the Vaughan Official Plan, 2010 ("**VOP 2010**").

Impugned Staff Proposed Modifications

We are in receipt and have reviewed the proposed modifications to existing policy 12.14 of the VOP 2010, set out as section 7.3 in the attachment to agenda Item No. 4.4 ("**Staff Proposed Modifications**").

On behalf of our Clients, we write to advise that our Clients object to the Staff Proposed Modifications in the strongest of terms.

The Staff Proposed Modifications represent a grand departure from the current policy framework wherein the entirety of the Maple Industrial Area is currently designated as an Employment Area.

The Staff Proposed Modifications:

- Threaten the viability of the Highway 400 North Employment Area;
- Disregard Provincial policies directed at protecting, preserving, and promoting Employment Uses and Mineral Aggregate Operations;
- Disregard current in-effect official plan policies which guide the removal of lands from Employment Areas;
- Ignore the policies of the D-Series Guidelines and NPC-300;
- Are internally inconsistent with the VOP 2025; and,
- Represent an attack on the principles of good planning.

Flawed Process and Breached Agreement

It was clear throughout the planning process leading to the adoption of the VOP 2025, that City staff and consultants were either not aware of, ignored, or did not fully comprehend the impact of Provincial changes to the policies and definitions applicable to

Employment Areas. This impact is not limited to the Maple Industrial Area/Highway 400 North Employment Area. Further, this fact is confirmed by underlying employment lands studies inaccurately identifying the Maple Industrial Area as non-employment from the outset. Therefore no analysis was undertaken to analyze the impact of the Staff Proposed Modifications to said lands.

Our Clients attempted to engage with City staff on multiple occasions, requesting time to meet to discuss their concerns with proposed policies and did not receive a response until September of 2025. In September 2025, our Clients were finally provided an opportunity to discuss their concerns regarding the draft VOP 2025 (as it then was) with staff.

These discussions resulted in City staff agreeing, in writing, to present for Council's consideration a request for a Ministerial modification to the VOP 2025 post-adoption, which would designate the Maple Industrial Area as an Employment area in its entirety (see Attachment 1) ("**Written Agreement**").

The current Staff Proposed Modifications represent an egregious, blatant, and utter disregard of the Written Agreement and a formal breach thereof as well as an abuse of process. In fact, rather than proposing the modifications outlined in the Written Agreement, City staff are now proposing that a majority of the lands in the Maple Industrial Area be removed from the Highway 400 North Employment Area without justification or appropriate study.

No studies have been undertaken to:

1. Identify a <u>need</u> for the removal of the lands from the Employment Area as required by Policy 2.8.2(5)(a) of the *Provincial Policy Statement*;

2. Confirm that the removal of the lands from the Employment Area <u>would not negatively impact the overall viability of the Employment Area</u> as required by Policy 2.8.2(5)(b) of the *Provincial Policy Statement*;

3. Confirm that existing or planned infrastructure and public service facilities are available to accommodate the proposed uses as required by Policy 2.8.2(5)(c) of the *Provincial Policy Statement*;

4. Confirm that the municipality has sufficient employment lands to accommodate the projected employment growth to the horizon of the official plan as required by Policy 2.8.2(5)(d) of the *Provincial Policy Statement*;

5. Assess the traffic impact of the Staff Proposed Modifications; and/or

6. Assess the compatibility of the Staff Proposed Modifications.

As articulated to our Clients, the staff position is based on an erroneous understanding of a settlement entered into by the City in relation to the VOP 2010 and a subsequent Local Planning Appeal Tribunal (predecessor to the Ontario Land Tribunal) ("**Tribunal**") decision in 2020.

That settlement, and the subsequent decision of the Tribunal, preceded the YROP 2022 comprehensive review which confirmed that all lands within the Maple Industrial Area are an Employment Area for the purposes of the Provincial Policy Statement protection thereof. The settlement and subsequent decision of the Tribunal also preceded significant changes that were made to the Provincial Planning Statement and the *Planning Act*.

Given that the lands are currently included in an Employment Area, Staff's Proposed Modifications represent what is commonly referred to as a conversion of an Employment Area to non-employment lands.

Further, even if the lands were not included in an Employment Area – which they are – provincial policy is clear that the City is required to plan for, protect, and preserve *employment areas* for current and future uses (see policy 2.8.2.(1) and 2.8.2.(3) of the Provincial Planning Statement), which the Staff Proposed Modifications fail to do.

Inaccurate and Misleading Staff Report

The staff report accompanying the Staff Proposed Modifications is misleading for at least the following reasons:

1. The staff report suggests "these modifications conform to the *Planning Act* as they remove permissions for uses on lands within the Employment Area that are excluded from the "area of employment" definition, and complement policy 2.2.4.2 of the adopted VOP 2025 that addresses lawfully established uses".

   As it relates to the Maple Industrial Area, the Staff Proposed Modifications do not remove permissions for uses on lands within the Employment Area that are no longer permitted – rather, they remove lands from an Employment Area and provide a designation for new non-employment uses to be established on a go-forward basis on the lands removed from the Employment Area.

2. The staff report suggests: "The draft modifications follow the land use designations as established in the adopted VOP 2025 and remove any permission for uses that are excluded from the Employment Area definition and policies".

As it relates to the Maple Industrial Area, the Staff Proposed Modifications do not follow the land use designations established in the VOP 2025 or simply remove permissions for uses on lands within the Employment Area – rather, they remove lands from an Employment Area, including lands given an Employment Area designation in the VOP 2025 as shown on schedule 1 thereof, and provide a designation for new non-employment uses to be established on a go-forward basis on the lands.

3. The staff report suggests that the Staff Proposed Modifications are an "interim measure to introduce employment transitional policies and align the definition of "area of employment" in accordance with the *Planning Act* and "employment area" in the Provincial Planning Statement 2024".

   As it relates to the Maple Industrial Area, the Staff Proposed Modifications are not an "interim measure" but rather represent a permanent conversion of the lands as they would have the effect of removing lands from an employment area on a permanent basis.

4. The staff report suggests "these modifications update area-specific plans and site-specific policies, which are located within the Employment Area in the adopted VOP 2025, are intended to follow Provincial direction and legislation on Employment Areas, aligning with the adopted VOP 2025".

   As it relates to the Maple Industrial Area, the Staff Proposed Modifications remove lands from an employment area which does not align with the adopted VOP 2025 or Provincial direction which require the designation and protection of Employment Areas.

Our Request for Council's Consideration

We provide for Council's consideration the proposed modifications to the as adopted VOP 2025 that our Clients previously provided to City Staff which would result in all of the lands within the Highway 400 North Employment Area remaining within an Employment Area designation (see Attachment 2) ("**Proposed Employment Modifications**").

It is our respectful submission that the Proposed Employment Modifications are necessary to ensure consistency of the as adopted VOP 2025 to the Provincial Planning Statement and other applicable Provincial guidelines.

We ask that Council approve a request for a Ministerial modification to modify the as-adopted VOP 2025 as follows:

(i) Modify Volume 1, Schedule 1 (Urban Structure) to designate the Maple Industrial Area, in its entirety as “Employment Areas”; and

(ii) Revise Volume 2, Maple Industry Area Area Specific Policy to reflect the text and Schedule set out in the Proposed Employment Modifications (Attachment 2).

I note that while our Clients look forward to working with City Council to right this wrong, undo the breach of the Written Agreement by staff, and to uphold good planning principles, we have received instructions to explore all legal options respecting this matter.

If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

LOOPSTRA NIXON LLP



Per: Steven C. Ferri

Cc: City Clerk clerks@vaughan.ca

ATTACHMENT 1

From: Max Rubin
To: Steven C. Ferri
Cc: Austin Ray; Effie Lidakis
Subject: RE: [External] CRH/GIP Maple Industrial Area
Date: October 8, 2025 10:32:10 PM
Attachments: image001.png
image002.png

Hello Steven and Austin:

As we talked about on our phone call earlier today, I have now had a chance to review your letter and talk about the matter further with City Staff.

I can confirm the following at a Staff level, of course, subject to Council Direction:

- That we intend to ensure that the North Maple Industrial Lands remain an Area of Employment in VOP 2010 and the Proposed VOP 2025.
- That we intend to bring forward an update to VOP 2025 by way of ministerial modification, pending adoption of VOP 2025 at the next Council meeting on October 28, 2025, by way of a public meeting in December 2025 and Council meeting for approval in January 2026.
- That we intend that the Maple Industrial Lands will remain an Area of Employment in VOP 2025, with the non-employment uses stripped out of the policies, therefore only allowing lawfully established non-employment uses to continue on the site, while allowing the expansion of permitted employment uses.
- That we intend also to bring forward an OPA to VOP 2010 on the same timeline of December and January to protect existing Areas of Employment and ensure they conform to the Planning Act and PPS, ensuring that lawfully established uses can continue without disturbing the nature of the Employment Lands.

Please let me know if you have any questions or require further clarification on any of the points above.

I appreciate your client's patience as we work through this matter.

Thank you,
Max

ATTACHMENT 2

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12.14 Maple Industrial Area

12.14.1 General

12.14.1.1 The following policies shall apply to the lands identified as the Subject Lands on Map 12.14.A.

12.14.1.2 The “Maple Industrial Area” shown on Schedule 12.14A are “Employment Areas” for the purposes of this Plan. Only those uses permitted in the definition of "area of employment" in paragraph 2 of Subsection 1(1) of the Planning Act shall be permitted. Pursuant to subsections 1 (1.1) and (1.2) of the Planning Act and Policy 3.2.3 of this Plan, uses that are legally existing in the Maple Industrial Area that are excluded from the definition of "area of employment" in paragraph 2 of Subsection 1(1) of the Planning Act, are authorized to continue so long as the use has been lawfully established on the parcel of land before October 20, 2024.

12.14.1.3 All italicized terms in this Policy shall have the meaning attributed to them in D-1 Guidelines, D-1-3 Land Use Compatibility: Definitions and the Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning Publication NPC-300, as amended or replaced from time to time. Despite anything to the contrary, and for greater certainty, the term *Sensitive Land Use(s)* shall include *Noise Sensitive Land Use(s)* and the term *Industrial Land Uses* shall include *Stationary Source(s)*.

12.14.1.4 The emission or discharge of *Noise*, *Vibration*, *Fugitive Emissions*, or other irritant resulting from a use permitted in accordance with Policy 12.14.2.1 on the lands identified as Area A and/or Area B on Map 12.14.A will not be considered to be a nuisance or to have an adverse effect on neighbouring uses for the purposes of Policy 12.14 and Policy 9.2.2.10(c) of this Plan provided that the emission or discharge has been granted approval by the Ministry of the Environment, Conservation and Parks or an equivalent provincial approval and provided that the emission or discharge meets the requirements of the applicable provincial approval.

12.14.2 Land Use Policies

Employment

12.14.2.1 Subject to Policy 12.14.2.4, Within the lands identified as Area A and Area B on Map 12.14.A, in addition to the uses permitted in Policy 3.2.3.1(b) General Employment and Policy 3.2.3.3(c) Prestige Employment, respectively, the following uses shall also be permitted in accordance with the following:

a. Within the lands designated Prestige Employment (an employment area designation as per policy 3.2.3) the following additional uses are permitted:

   i. Production of stucco, including tinting and sale of building materials with both indoor and outdoor display and storage.

b. Within the lands designated General Employment (an employment area designation as per policy 3.2.3) the following additional uses are permitted:

i. a concrete batching plant;

ii. recycling of used concrete, which includes screening and crushing of aggregate materials including concrete;

iii. an aggregate transfer station;

iv. outdoor storage; and,

v. an asphalt plant and/or the recycling of used asphalt provided that the following may only be permitted on the lands identified as Area B on Map 12.14.A:

A. crusher(s) and screen(s);

B. aggregate dryer and associated dust collection system;

C. batch tower and associated hot screens, mixer, and slat conveyors (bucket elevator);

D. asphalt cement storage tanks;

E. hot mix asphalt storage silos;

F. hot oil heater;

G. hot mix asphalt load out bays; and,

H. screening and crushing of aggregate materials including asphalt and concrete.

12.14.2.2 Where all or any portion of the lands shown as Area A or Area B on Map 12.14.A is used as contemplated in Policies 12.14.2.1.a.i and 12.14.2.1.b.i to 12.14.2.1.b.iv, no *Sensitive Land Use(s)* shall be permitted within 70 metres of the lands identified as Area A and Area B on Map 12.14.A without an amendment to this Plan.

12.14.2.3 Where all or any portion of the lands shown as Area B on Map 12.14.A is used as contemplated in section 12.14.2.1.b.v, no *Sensitive Land Use(s)* shall be permitted within 300 metres of the lands identified as Area B on Map 12.14.A without an amendment to this Plan.

Sensitive Land Uses

12.14.2.4 Notwithstanding the uses permitted in Policies 12.14.2.1, 3.2.3.1(b) and 3.2.3.3(c), no *Sensitive Land Use(s)*, including those listed in Policies 3.1.1.7(a), (d), (e), (f), and (g), shall be permitted on lands designated General Employment or Prestige Employment as illustrated on Map 12.14.A, without the approval of an Official Plan Amendment in accordance with the Policies of 12.14.2.5 and shall require site plan approval.

Applications

12.14.2.5 Applications for the re-designation of any part of the "Maple Industrial Area" that propose to introduce *Sensitive Land Use(s)* shall be considered only where such part of the "Maple Industrial Area" is supported by an official plan amendment application that demonstrates the following:

a. Conform to Policy 2.2.4;

b. Comply with all applicable Provincial and municipal policies and/or guidelines as amended from time to time, including the Provincial Planning Statement, Guideline D-6 as amended and the Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning Publication NPC-300, as amended or replaced from time to time;

c. Include with applications for proposed *Sensitive Land Use(s)*, appropriate studies including (i) *Noise*, (ii) air quality, (iii) *Vibration*, (iv) *Fugitive Emissions*, (v) lighting, (vi) overlook and (vii) traffic generation, that demonstrate the proposed use is compatible with all surrounding uses having regard for good planning principles and in accordance with all applicable Provincial and municipal policies and/or guidelines;

d. Include studies that identify appropriate measure(s) to mitigate impacts from the *Industrial Land Uses* to ensure compliance with all provincial and municipal requirements, laws, policies, and/or guidelines for the *Industrial Land Uses* located within the Subject Lands is maintained. Identified mitigation measures shall be implemented prior to occupancy of any buildings, structures, or other improvements through site plan control and associated agreements as a condition of approval. The identified mitigation measures shall be implemented on the lands subject to the development application except where the owner(s) of the *Industrial Land Uses* and/or *Stationary Source(s)* consent and agree otherwise. The implementation and maintenance of any required identified mitigation measures may, where feasible, be included in appropriate agreement(s) between the developer of the *Sensitive Land Use(s)* and the owner(s) of the *Industrial Land Uses* and registered on title; and,

e. Be subject to the following conditions:

   i. Prior to applying for an occupancy permit, the developer of buildings, structures, or other improvements on the *Sensitive Land Use(s)* must demonstrate that compliance with all provincial and municipal requirements, laws, policies, and/or guidelines for the *Industrial Land Uses* located within the Subject Lands is maintained provided that such *Industrial Land Uses* are otherwise in compliance with Policy 12.14.1.3 and all approvals by the Ministry of the Environment, Conservation and Parks or any equivalent provincial approvals. Where compliance for the *Industrial Land Uses* cannot be demonstrated, remedial measures shall be implemented by the developer of the *Sensitive Land Use(s)* prior to occupancy of any buildings, structures, or other improvements provided that such *Industrial Land Uses* are in compliance with all approvals by the Ministry of the Environment,

Conservation and Parks or any equivalent provincial approvals and Policy 12.14.1.3;

ii. Appropriate design measures and other requirements including restrictions on the permission, occupancy, location, and/or orientation of any proposed building or other potential *Point(s) of Reception*, including the location of *Outdoor Living Spaces* and amenity spaces within buildings, buffering and screening of potential *Point(s) of Reception*, requirement(s) for *Warning Clauses* and, where feasible, appropriate agreements, shall be implemented through the zoning by-law and as condition of site plan approval and/or any related development approvals to ensure that the objectives of NPC-300 and the D-6 guidelines, as amended or replaced from time to time, are achieved; and,

iii. As a condition of site plan approval, prior to applying for a building permit in respect of a Sensitive Land Use, the owner shall be required to provide a certificate issued by a professional engineer or other qualified professional, addressed to the Chief Building Official with a copy to the owners of the Industrial Land Uses, certifying that the requirements of this policy 12.14.2.5 have been met.

Monitoring and Mitigation of Waste Disposal Activities

12.14.2.6 In addition to the uses permitted in Volume 1 of this Plan and in addition to the uses permitted above, uses related to the monitoring and mitigation of the effects of waste disposal activities are permitted on all of the Subject Lands identified on Map 12.14.A.

Map 12.14.A – Maple Industrial Area



Map 12.14A: Maple Industrial Area

ATTACHMENT “B”

12.14 Maple Industrial Area

12.14.1 General

12.14.1.1 The following policies shall apply to the lands identified as the Subject Lands on Map 12.14.A.

12.14.1.2 The “Maple Industrial Area” shown on Schedule 12.14A are “Employment Areas” for the purposes of this Plan. Only those uses permitted in the definition of "area of employment" in paragraph 2 of Subsection 1(1) of the Planning Act shall be permitted. Pursuant to subsections 1 (1.1) and (1.2) of the Planning Act and Policy 3.2.3 of this Plan, uses that are legally existing in the Maple Industrial Area that are excluded from the definition of "area of employment" in paragraph 2 of Subsection 1(1) of the Planning Act, are authorized to continue so long as the use has been lawfully established on the parcel of land before October 20, 2024.

12.14.1.3 All italicized terms in this Policy shall have the meaning attributed to them in D-1 Guidelines, D-1-3 Land Use Compatibility: Definitions and the Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning Publication NPC-300, as amended or replaced from time to time. Despite anything to the contrary, and for greater certainty, the term *Sensitive Land Use(s)* shall include *Noise Sensitive Land Use(s)* and the term *Industrial Land Uses* shall include *Stationary Source(s)*.

12.14.1.4 The emission or discharge of *Noise*, *Vibration*, *Fugitive Emissions*, or other irritant resulting from a use permitted in accordance with Policy 12.14.2.1 on the lands identified as Area A and/or Area B on Map 12.14.A will not be considered to be a nuisance or to have an adverse effect on neighbouring uses for the purposes of Policy 12.14 and Policy 9.2.2.10(c) of this Plan provided that the emission or discharge has been granted approval by the Ministry of the Environment, Conservation and Parks or an equivalent provincial approval and provided that the emission or discharge meets the requirements of the applicable provincial approval.

12.14.2 Land Use Policies

Employment

12.14.2.1 Subject to Policy 12.14.2.4, Within the lands identified as Area A and Area B on Map 12.14.A, in addition to the uses permitted in Policy 3.2.3.1(b) General Employment and Policy 3.2.3.3(c) Prestige Employment, respectively, the following uses shall also be permitted in accordance with the following:

a. Within the lands designated Prestige Employment (an employment area designation as per policy 3.2.3) the following additional uses are permitted:

   i. Production of stucco, including tinting and sale of building materials with both indoor and outdoor display and storage.

b. Within the lands designated General Employment (an employment area designation as per policy 3.2.3) the following additional uses are permitted:

i. a concrete batching plant;

ii. recycling of used concrete, which includes screening and crushing of aggregate materials including concrete;

iii. an aggregate transfer station;

iv. outdoor storage; and,

v. an asphalt plant and/or the recycling of used asphalt provided that the following may only be permitted on the lands identified as Area B on Map 12.14.A:

A. crusher(s) and screen(s);

B. aggregate dryer and associated dust collection system;

C. batch tower and associated hot screens, mixer, and slat conveyors (bucket elevator);

D. asphalt cement storage tanks;

E. hot mix asphalt storage silos;

F. hot oil heater;

G. hot mix asphalt load out bays; and,

H. screening and crushing of aggregate materials including asphalt and concrete.

12.14.2.2 Where all or any portion of the lands shown as Area A or Area B on Map 12.14.A is used as contemplated in Policies 12.14.2.1.a.i and 12.14.2.1.b.i to 12.14.2.1.b.iv, no *Sensitive Land Use(s)* shall be permitted within 70 metres of the lands identified as Area A and Area B on Map 12.14.A without an amendment to this Plan.

12.14.2.3 Where all or any portion of the lands shown as Area B on Map 12.14.A is used as contemplated in section 12.14.2.1.b.v, no *Sensitive Land Use(s)* shall be permitted within 300 metres of the lands identified as Area B on Map 12.14.A without an amendment to this Plan.

Sensitive Land Uses

12.14.2.4 Notwithstanding the uses permitted in Policies 12.14.2.1, 3.2.3.1(b) and 3.2.3.3(c), no *Sensitive Land Use(s)*, including those listed in Policies 3.1.1.7(a), (d), (e), (f), and (g), shall be permitted on lands designated General Employment or Prestige Employment as illustrated on Map 12.14.A, without the approval of an Official Plan Amendment in accordance with the Policies of 12.14.2.5 and shall require site plan approval.

Applications

12.14.2.5 Applications for the re-designation of any part of the "Maple Industrial Area" that propose to introduce *Sensitive Land Use(s)* shall be considered only where such part of the "Maple Industrial Area" is supported by an official plan amendment application that demonstrates the following:

a. Conform to Policy 2.2.4;

b. Comply with all applicable Provincial and municipal policies and/or guidelines as amended from time to time, including the Provincial Planning Statement, Guideline D-6 as amended and the Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning Publication NPC-300, as amended or replaced from time to time;

c. Include with applications for proposed *Sensitive Land Use(s)*, appropriate studies including (i) *Noise*, (ii) air quality, (iii) *Vibration*, (iv) *Fugitive Emissions*, (v) lighting, (vi) overlook and (vii) traffic generation, that demonstrate the proposed use is compatible with all surrounding uses having regard for good planning principles and in accordance with all applicable Provincial and municipal policies and/or guidelines;

d. Include studies that identify appropriate measure(s) to mitigate impacts from the *Industrial Land Uses* to ensure compliance with all provincial and municipal requirements, laws, policies, and/or guidelines for the *Industrial Land Uses* located within the Subject Lands is maintained. Identified mitigation measures shall be implemented prior to occupancy of any buildings, structures, or other improvements through site plan control and associated agreements as a condition of approval. The identified mitigation measures shall be implemented on the lands subject to the development application except where the owner(s) of the *Industrial Land Uses* and/or *Stationary Source(s)* consent and agree otherwise. The implementation and maintenance of any required identified mitigation measures may, where feasible, be included in appropriate agreement(s) between the developer of the *Sensitive Land Use(s)* and the owner(s) of the *Industrial Land Uses* and registered on title; and,

e. Be subject to the following conditions:

   i. Prior to applying for an occupancy permit, the developer of buildings, structures, or other improvements on the *Sensitive Land Use(s)* must demonstrate that compliance with all provincial and municipal requirements, laws, policies, and/or guidelines for the *Industrial Land Uses* located within the Subject Lands is maintained provided that such *Industrial Land Uses* are otherwise in compliance with Policy 12.14.1.3 and all approvals by the Ministry of the Environment, Conservation and Parks or any equivalent provincial approvals. Where compliance for the *Industrial Land Uses* cannot be demonstrated, remedial measures shall be implemented by the developer of the *Sensitive Land Use(s)* prior to occupancy of any buildings, structures, or other improvements provided that such *Industrial Land Uses* are in compliance with all approvals by the Ministry of the Environment,

Conservation and Parks or any equivalent provincial approvals and Policy 12.14.1.3;

ii. Appropriate design measures and other requirements including restrictions on the permission, occupancy, location, and/or orientation of any proposed building or other potential *Point(s) of Reception*, including the location of *Outdoor Living Spaces* and amenity spaces within buildings, buffering and screening of potential *Point(s) of Reception*, requirement(s) for *Warning Clauses* and, where feasible, appropriate agreements, shall be implemented through the zoning by-law and as condition of site plan approval and/or any related development approvals to ensure that the objectives of NPC-300 and the D-6 guidelines, as amended or replaced from time to time, are achieved; and,

iii. As a condition of site plan approval, prior to applying for a building permit in respect of a Sensitive Land Use, the owner shall be required to provide a certificate issued by a professional engineer or other qualified professional, addressed to the Chief Building Official with a copy to the owners of the Industrial Land Uses, certifying that the requirements of this policy 12.14.2.5 have been met.

Monitoring and Mitigation of Waste Disposal Activities

12.14.2.6 In addition to the uses permitted in Volume 1 of this Plan and in addition to the uses permitted above, uses related to the monitoring and mitigation of the effects of waste disposal activities are permitted on all of the Subject Lands identified on Map 12.14.A.

Map 12.14.A – Maple Industrial Area

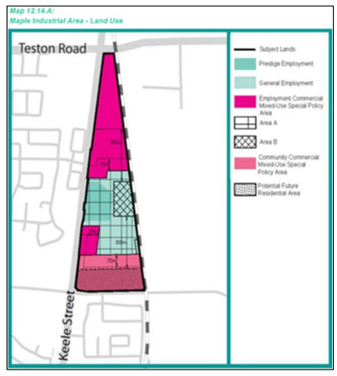


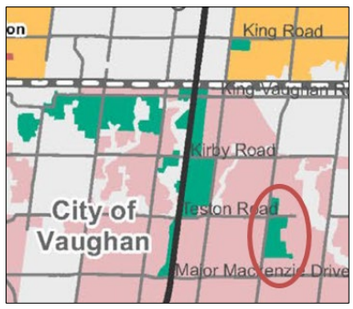
Map 12.14A: Maple Industrial Area

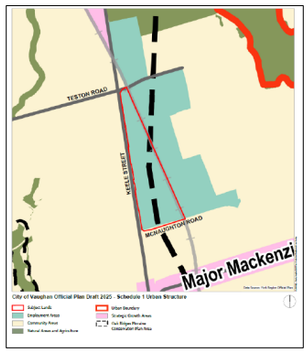
ATTACHMENT "C"

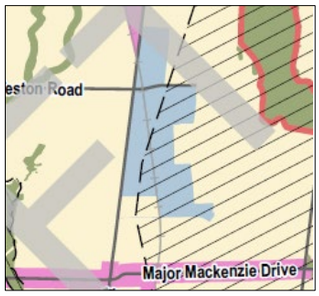
TIMELINE

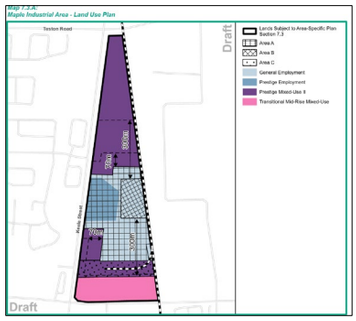
1960	OPA 4 – Maple Industrial Area Designated for Employment Uses to reflect existing uses.
1983 (Approved by MMAH)	OPA 150 – Entirety of Maple Industrial Area Lands Designated for Employment Uses.
1995 (Approved by MMAH)	OPA 332 – Maple Industrial Area Designated for Employment Uses.
2021 (Approved by OLT)	Vaughan OP 2010 – Maple Industrial Area (except for Alpa/Argo lands – light pink) Designated for Employment Uses (dark pink and dark/light blue) through settlement agreement with our clients. • Note: VOP 2010 decision came into effect in 2021 and was based on planning horizon to 2031
2021 - 2022	York Region Region-wide Municipal Comprehensive Review • Region-wide analysis of Employment Land Needs for planning horizon to 2051 and considered numerous conversion requests.
Jun 2022 (Approved By MMAH)	York Region Official Plan, as adopted and approved, designated the entirety of the Maple Industrial Area (including Alpa/Argo Lands) as an “Employment Area” – part of the greater 400 North Employment Area. • This designation was specifically requested by Vaughan representatives at Regional Council which allowed other Employment Areas in Vaughan to be converted.
Oct 2024	New ‘Employment Area’ definition in PPS and ‘Area of Employment’ definition in Planning Act comes into effect. • All land use planning decisions must be consistent with the PPS as amended in 2024
May 2025	Draft Vaughan Official Plan – entirety of Maple Industrial Area Designated as Employment Area on Schedule 1 of Draft VOP.
Jun 2025 (Approved by OLT)	Vaughan CZBL – Amended as it applies to the Employment Triangle to remove all non-employment area use permissions and only permits Employment Area uses in accordance with PPS and its new Employment Area definitions/policies. • Settlement between our clients and City of Vaughan, approved by the OLT. Supported by the expert land use planning evidence of a City planner.
Sept 2025	Draft Vaughan Official Plan – Maple Industrial Area except Alpa/Argo lands as Employment Area on Schedule 1 of Draft VOP.
Sept 24 2025	Submission made requesting that entirety of Maple Industrial area be Designated as Employment Area on Schedule 1 of Draft VOP and modifications to Area Specific Policy were included to reflect the new definition of Employment Area.
Sept 30 2025	Submission made requesting that entirety of Maple Industrial area be Designated as Employment Area on Schedule 1 of Draft VOP (as set out by approved YROP)
Oct 8 2025	Confirmation from City Staff that entirety of Maple Industrial Area will be designated as Employment Area in Draft VOP
Oct 28 2025	Adopted Vaughan Official Plan – Maple Industrial Area except Alpa/Argo lands Designated as Employment Area on Schedule 1 of Draft VOP
Nov 2025	Draft Request for Ministers Modification – All lands within Maple Industrial Area, except our clients’ lands, are removed from Employment Areas despite agreement confirmed on Oct 28 2025 to designate entirety of Maple Industrial Area as Employment Area.











ATTACHMENT “D”

From: Max Rubin
To: Steven C. Ferri
Cc: Austin Ray; Effie Lidakis
Subject: RE: [External] CRH/GIP Maple Industrial Area
Date: October 8, 2025 10:32:10 PM
Attachments: image001.png
image002.png

Hello Steven and Austin:

As we talked about on our phone call earlier today, I have now had a chance to review your letter and talk about the matter further with City Staff.

I can confirm the following at a Staff level, of course, subject to Council Direction:

- That we intend to ensure that the North Maple Industrial Lands remain an Area of Employment in VOP 2010 and the Proposed VOP 2025.
- That we intend to bring forward an update to VOP 2025 by way of ministerial modification, pending adoption of VOP 2025 at the next Council meeting on October 28, 2025, by way of a public meeting in December 2025 and Council meeting for approval in January 2026.
- That we intend that the Maple Industrial Lands will remain an Area of Employment in VOP 2025, with the non-employment uses stripped out of the policies, therefore only allowing lawfully established non-employment uses to continue on the site, while allowing the expansion of permitted employment uses.
- That we intend also to bring forward an OPA to VOP 2010 on the same timeline of December and January to protect existing Areas of Employment and ensure they conform to the Planning Act and PPS, ensuring that lawfully established uses can continue without disturbing the nature of the Employment Lands.

Please let me know if you have any questions or require further clarification on any of the points above.

I appreciate your client's patience as we work through this matter.

Thank you,
Max