WESTON CONSULTING

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

March 14, 2025
File 3867

Attn: Fausto Filipetto, Project Manager

RE: Comments on the Draft Vaughan Official Plan 2025
9081 Weston Road

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the "Owner"), the owners of the lands municipally known as 9081 Weston Road (the "Site"). We are monitoring the City of Vaughan's Official Plan Review process on behalf of the Owner and are pleased to provide the following comments on the Draft Vaughan Official Plan 2025 (the "Draft VOP") as it relates to the Site. We previously submitted written correspondence on the Official Plan Review in a letter dated October 3, 2023 (attached).

Site Context

The Site is part of a broader development block that 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 (Figure 1).

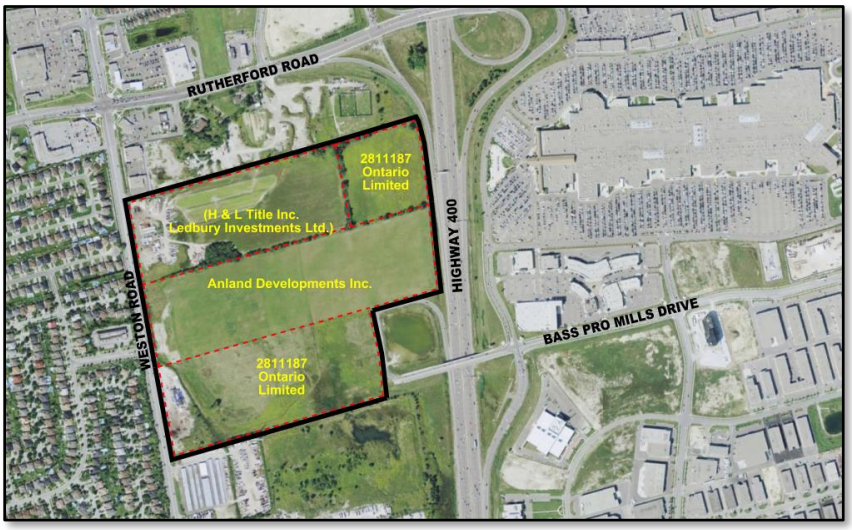


Figure 1: Map of Development Block of Landowners

In 2012 and 2014, landowners within the development block, including the Owner, appealed the 2010 Vaughan Official Plan (VOP 2010) and the Vaughan Mills Centre Secondary Plan (VMCSP), seeking to introduce non-employment use permissions on the western portion of the development block. As part of those appeals, the Owner sought to redesignate the Site within a *Primary Centre* and apply a mixed-use designation to permit residential uses with a range of heights and densities. 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, will 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, as reflected in amendments to the *Planning Act*, a new Provincial Planning Statement and the elimination of the Growth Plan for the Greater Golden Horseshoe, all of which occurred in October 2024.

The VOP 2010 identifies the Site within an *Employment Areas* and within the *Natural Areas and Countryside* according to Schedule 1 (Urban Structure). The Site is also located within the Vaughan Mills Centre Secondary Plan area.

City of Vaughan Official Plan Review

We have reviewed the draft policies and schedules of the Draft VOP released to date and are pleased to provide the following comments:

Land Use Designation and Urban Structure

Schedule 13 (Land Use Designations) of the Draft VOP identifies the Site within the Vaughan Mills Centre Secondary Plan (VMCSP). The VMCSP designates the Site *Prestige Office Employment* and *Prestige Employment*, although those designations are subject to appeals that remain before the OLT. In our opinion, *High Rise Mixed Use* and *Mid-Rise Mixed Use* designations are appropriate for the Site and should be depicted as such on Schedule 13 of the Draft VOP and within the VMCSP. According to Section 4.2.2 of the Draft VOP, the mixed use designations "*are primarily intended to support the evolution of Strategic Growth Areas into vibrant Complete Communities, with a range of housing and employment options, and services such as food stores, pharmacies, financial institutions, and restaurants within walking distance of residents*." The mixed-use designations permit both residential and non-residential uses on the same lot.

Based on the context of the Site between a residential neighbourhood and the Vaughan Mills Shopping Centre, the *Mid-Rise Mixed Use* and *High Rise Mixed Use* designations are appropriate and support the intent of Section 4.2.2. The introduction of the *Mid-Rise Mixed-Use* designation along Weston Road and *High Rise Mixed-Use* designation on the balance of the Site will provide appropriate transition between these two areas and create a more integrated complete community with residential and non-residential densities. By integrating new housing and job opportunities in proximity, it encourages the use of alternate forms of transportation and reduces the number and length of individual automobile trips which supports one of the policy objectives of the Draft VOP for Mixed Use areas.

It is our opinion that the land use designation identified in the VMCSP is not appropriate in the context of the provincial policy direction, which does not permit office or retail use to be located in Employment Areas. According to the new definition of "area of employment" established in Section 1 of the *Planning Act,* as of October 2024, 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. The VMCSP identifies the entirety of the Vaughan Mills Centre as being a Priority Area for intensification and envisions intensification and redevelopment throughout all areas of the secondary plan area. Additionally, the VMCSP seeks to create a complete and well-integrated mixed-use urban centre that promotes connectivity throughout the area, including across Highway 400 which is further supported by the future Bass Pro Mills Drive extension. The *High Rise Mixed Use* and *Mid Rise Mixed Use* designations for the Site will support the goal of the VMCSP and should be reflected on Schedule 13 of the Draft VOP. Accordingly, we request Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed Use* and *High Rise Mixed Use*.

Urban Structure

The Draft VOP identifies two categories for Employment Areas: *Core Employment Areas*, which are areas that meet the amended definition of "area of employment" in Section 1 of the *Planning Act*, and *Supporting Employment Areas*, which do not meet the definition of "area of employment" and permit a broader range of uses including standalone office and retail uses. The Site is located within a *Core Employment Area* according to draft Schedule 1 (Urban Structure), with lands designated *Supporting Employment Areas* to the east and south of the Site within the balance of the development block.



Figure 2: Schedule 1 of the Draft VOP: Urban Structure

The Draft VOP also establishes a hierarchy of Strategic Growth Areas, which include *Primary Centres* and *Primary Intensification Corridors*. Draft Schedule 1A identifies the southern portion of Rutherford Road as a *Primary Intensification Corridor within Employment Areas* and the northern portion of Rutherford Road as a *Primary Intensification Corridor*. The lands east of the Site, across Highway 400, are identified as a *Primary Centre*. Policy 2.2.1.1 describes these Strategic Growth Areas:

> *ii. Primary Centres are locations of Intensification accommodated in the form of predominantly mixed-use high- and mid-rise buildings, developed at an intensity that is supportive of transit;*
>
> *vi. Primary Intensification Corridors link together the various centres on transit supportive corridors and will be places to accommodate Intensification in the form of mixed-use Mid-Rise Buildings, limited mixed-use High-Rise Buildings and Low-Rise Buildings;*



Figure 3: Schedule 1A of the Draft VOP: Strategic Growth Areas

In our opinion, the *Core Employment Area* category is not appropriate for the Site as it represents a transitional area between an established residential neighbourhood and the Vaughan Mills Shopping Centre. Lands within the *Core 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 Site due to its location between a *Primary Centre* to the east and an established residential neighbourhood to the west. As discussed above, the Site should be redesignated *Mid Rise Mixed Use* and *High Rise Mixed Use* to support an appropriate development pattern that will create an integrated and complete community.

As such, we request the *Primary Centre* Strategic Growth Area be extended to the Site. It should be noted that the Site and broader Development Block have remained largely vacant for several years despite historically being designated for employment uses.

Policy 2.2.2.4 of the Draft VOP states that *Primary Centres* shall be planned to:

a. *Develop with a mix of housing types and tenures, including housing suitable for seniors and families with children and Affordable Housing and Attainable Housing*
b. *include a mix of non-residential uses, including Retail, office, institutional, Community Facilities, and Human Services intended to serve both the local population and the City as a whole, and attract activity throughout the day;*
c. *develop at densities supportive of planned public transit;*
d. *have a fine grain multimodal 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;*
e. *include an appropriate amount of well-designed public open spaces appropriate to the local context, including City-owned parks;*

f. encourage a pedestrian-friendly built form by locating active uses at grade; and
g. be designed and developed to implement appropriate transition of intensity and use to surrounding Community Areas, and/or compatibility with adjacent Employment Areas

Furthermore, we note that the Site is not located in proximity to major Rail Facilities, which is described as an important feature of *Core Employment Areas* within the Draft VOP. According to Section 2.2.4,

> *Core Employment Areas also include the City's major Rail Facilities, identified on Schedule 1. Rail-related policies are included in Section 3.9. Close proximity to highway access and providing appropriate frontage for these facilities is important.*

It should be noted that we are coordinating with the adjacent landowners to prepare a concept that will demonstrate how mixed-use development can support residential and non-residential growth within the development block between Weston Road and Highway 400 as part of a complete community.

Natural Heritage Framework

According to Schedule 2 of the Draft VOP, an *Enhancement Area* is identified on the Site (Figure 4). According to Policy 3.6.3.16, *Enhancement Areas are undeveloped lands identified conceptually on Schedule 2 and are important components of the Natural Heritage Network because they have 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.



Figure 4: Draft Schedule 2 of the Draft VOP: Natural Heritage Network

Policy 3.6.3.17 states that,

> *Enhancement Areas shown on Schedule 2 are approximate and the final location and boundary of the Enhancement Area will be based on a natural heritage evaluation or Environmental Impact Study completed as part of the Development process.*

Furthermore, Policy 3.6.3.20 states that,

> *Enhancement Areas as determined by policy 3.6.3.17 above will be incorporated into the Natural Heritage Network as Core Features and/or open space designations and conveyed to the City as a condition of Development approval. Such changes do not require amendment to this Plan*.

We support the intent of these policies to allow for the refinement of *Enhancement Areas* based on the findings of an Environmental Impact Study (EIS) without an Official Plan Amendment. However, it should be noted that the *Enhancement Area* depicted on Schedule 2 of the Draft VOP does not accurately reflect the existing conditions on the Site. A portion of Black Creek currently traverses north-south along the westerly boundary of the Site. Schedule 2 should be revised to remove the *Enhancement Area* depicted as does not reflect the existing condition on the Site. It is noted that the VMSCP contemplates the realignment of Black Creek; however this will be addressed through a formal development application review process.

Road Classifications

According to Schedules 9A, 9B and 9C of the Draft VOP, a proposed road network is identified on the Site consisting of two north-south Minor Collector Streets and one east-west Local Street. In our opinion, including the proposed conceptual street network through the Site is inappropriate. Including a conceptual road network in the Draft VOP may create limitations for future development applications. With the exception of the extension of Bass Pro Mills Drive, the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application. We request the road network on Schedules 9A, 9B and 9C of the Draft VOP be removed.

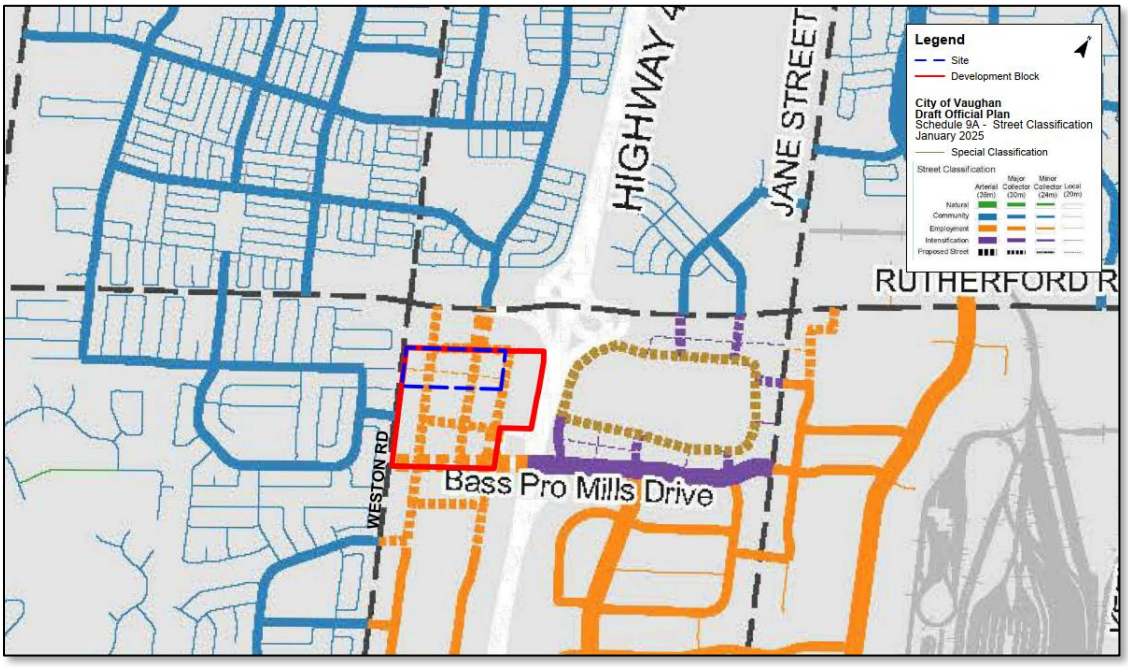


Figure 5: Draft Schedule 9A of the Draft VOP: Street Classification

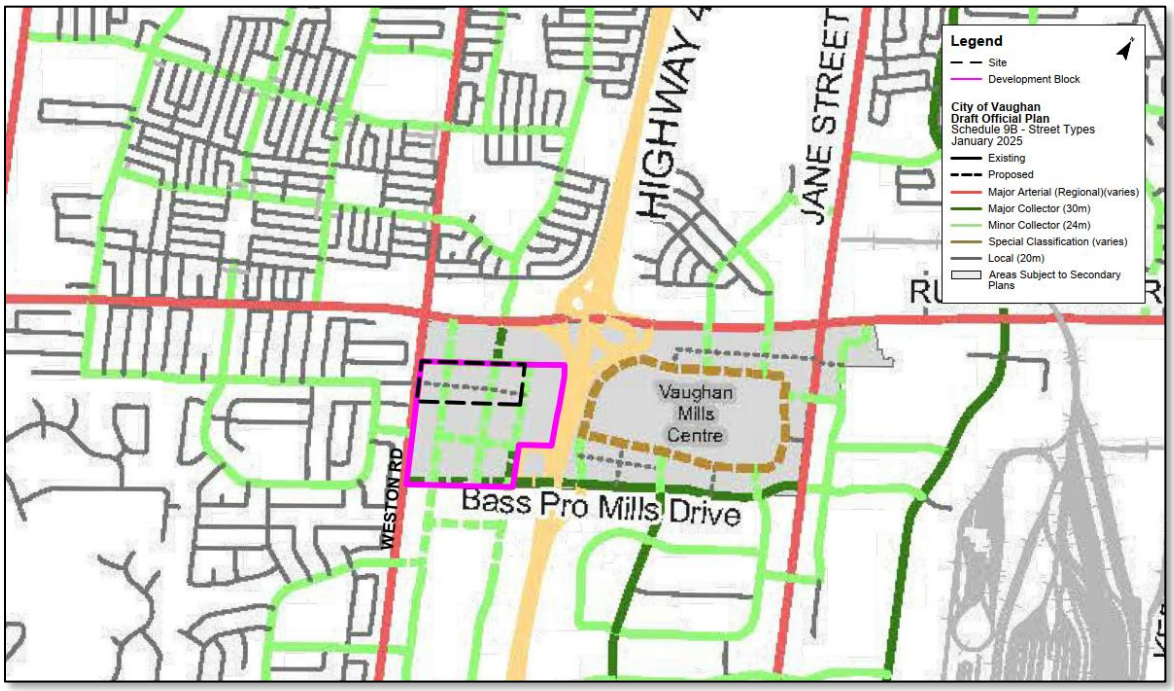


Figure 6: Draft Schedule 9B: Street Types

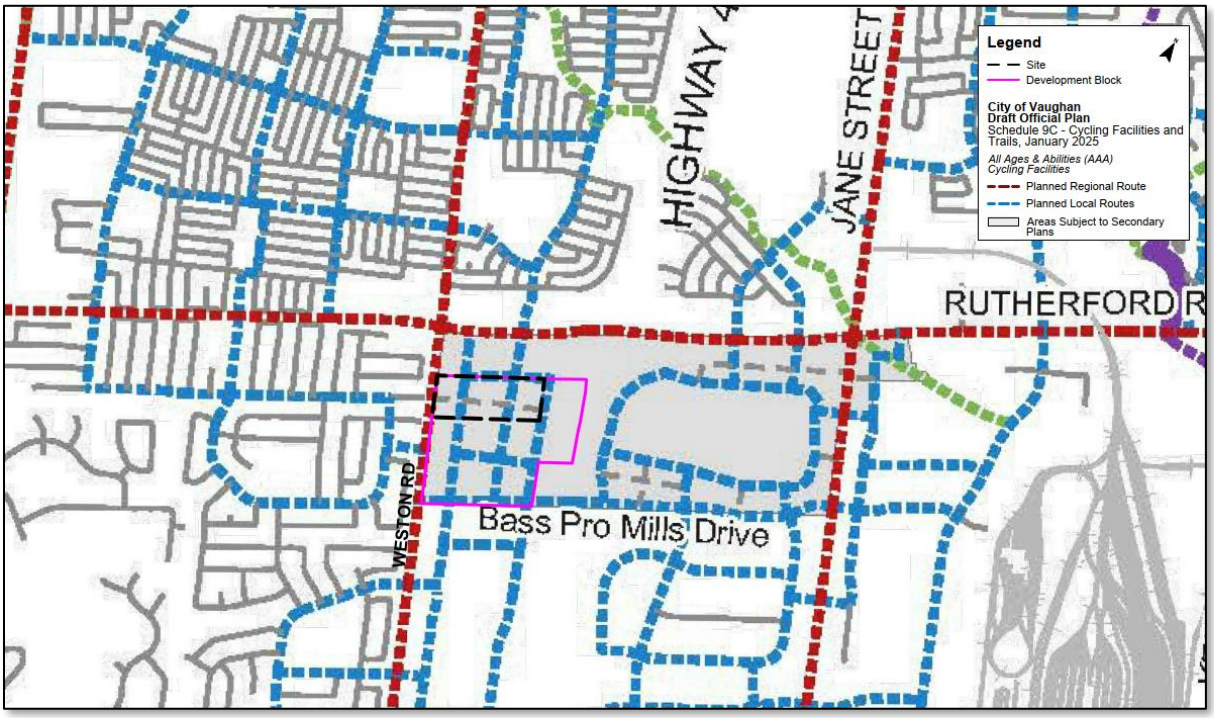


Figure 7: Draft Schedule 9C: Cycling Facilities and Trails

Transition

Section 1.4.2 of the Draft VOP provides transition policies that will repeal VOP 2010 subject to the criteria of Policy 1.4.2.1 to Policy 1.4.2.2. Applications in process will also be subject to transition policies established in the Draft VOP. We note that certain matters of VOP 2010 for the lands west of Highway 400, including the Site, have been appealed to the OLT and are yet to be disposed of fully.

Section 1.4.2.1 of the Draft VOP provides transition policies for the repeal of VOP 2010. According to Policy 1.4.2.1(b),

> *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 for the following secondary plan areas:*
>
> *i. The "Weston Road and Highway 7" area shown on Schedule 14A; and*
> *ii. The "Vaughan Metropolitan Centre" area shown on Schedule 14A.*

It is our understanding that the policies and schedules of the VMCSP will continue to apply to the Site; however, these policies and schedules, as they relate to the lands west of Highway 400, are under appeal to the OLT. Based on the analysis provided in this letter, it is our opinion that *Mid-Rise Mixed Use* and *High-Rise Mixed-Use* designations are appropriate for the Site and should be depicted on Schedule 13 (Land Use) of the Draft VOP. The extension of the *Primary Centre* Strategic Growth Area category to include the Site supports this objective.

Conclusion

In summary, we are pleased to provide the following requests:

- Revised Schedule 13 of the Draft VOP to designate the Site *Mid Rise Mixed Use* along Weston Road and *High Rise Mixed Use* for the balance of the Site.
- Revise Schedule 1 of the Draft VOP to remove the *Core Employment Area* and apply the *Strategic Growth Area* to the Site.
- Revise Schedule 1A to extend the *Primary Centre* category to the Site to permit a mix of uses in support of a complete community.
- Revise Schedules 9A, 9B and 9C to remove the conceptual road pattern.
- Revise Schedule 2 to remove the *Enhancement Areas* on the Site.

Weston Consulting will continue to monitor the Official Plan Review process and reserves the right to provide further comments on this matter. We request to be notified on any future updates as well as any discussion pertaining to the designations and policies pertaining to the Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at ext. 241, Darrin Cohen at extension 329, or James Todd at extension 345.

Yours truly,
Weston Consulting
Per:

Ryan Guetter, BES, MCIP, RPP
President

Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, October 3, 2023

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

City Council
City of Vaughan
2141 Major Mackenzie Drive West
Vaughan, ON, L6A 1P7

October 3, 2023
File 3867

RE: City of Vaughan Official Plan Review
H&L Title Inc. and Ledbury Investments Ltd.
South of Rutherford Road and east of Weston Road

Weston Consulting is the planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (collectively, the "Owners"), the owners of the lands consisting of approximately 10.1 hectares located south of Rutherford Road and east of Weston Road, in the City of Vaughan (the "subject lands"). The subject lands are located in the southeastern quadrant of the Weston Road and Rutherford Road intersection in the City of Vaughan and are situated west of Highway 400. The purpose of this letter is to provide formal comments on the City of Vaughan's Official Plan Review and the draft materials that have been released for review and comment. As additional draft materials are released, we may provide further comments.

On November 4, 2022, the Ministry of Municipal Affairs and Housing modified and approved the new York Region Official Plan. The nature of the modifications included redesignating certain lands throughout the Region. As per the Minister's direction, the lands adjacent to the subject lands to the east and south were redesignated from an *Employment Area* designation to *Community Area*, as per Map 1A, Land Use Designations (see Figure 1 below). The subject lands were not redesignated by the Minister's decision and maintained an *Employment Area* designation.

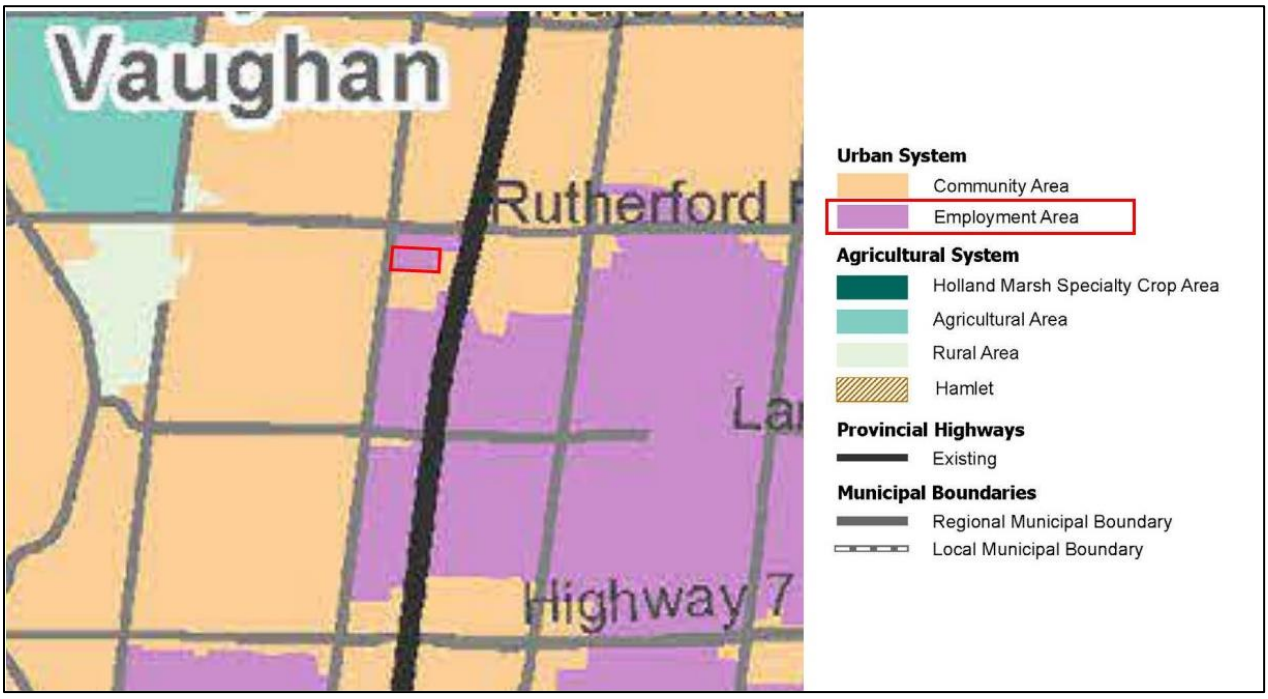


Figure 1: York Region Official Plan, Map 1A, Land Use Designations

Based on draft Schedule 1, Urban Structure of the City of Vaughan Official Plan, the land use designations of the subject lands are identified as *Employment Area,* whereas the adjacent lands are not consistent with the Minister's land use modifications to the York Region Official Plan on November 4, 2022. Notably, in the south east quadrant of Weston Road and Rutherford Road, the *Community Area* designation as per draft City of Vaughan Official Plan Schedule 1 is not consistent with the *Community Area* designation per York Region's Map 1A, Land Use Designations, with the City's draft Schedule 1 identifying lands immediately south of the subject lands as *Employment Area* whereas these lands are designated as *Community Area* in the York Region Official Plan (see Figure 2 below).

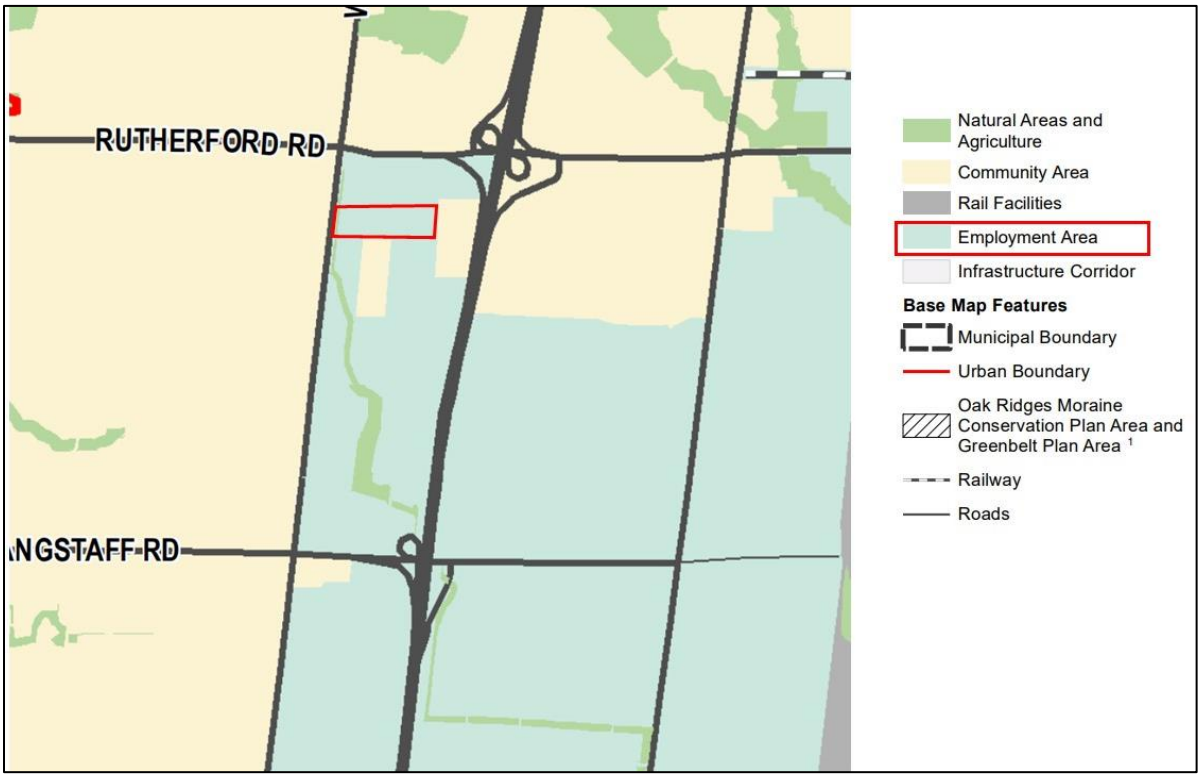


Figure 2: Draft City of Vaughan Official Plan, Schedule 1, Urban Structure

As a result of the inconsistency between the approved York Region Official Plan Map 1A and draft City of Vaughan Official Plan Schedule 1, the Owners request that the City revise the land use designation on Schedule 1, Urban Structure to ensure consistency with the Minster's decision on November 4, 2022. Further, we recommend that the City take steps to incorporate the subject lands as part of the *Community Area* in order to provide greater continuity of the land use designation and ultimately avoid orphaned *Employment Area* parcels in the City. The redesignation of the lands to *Community Area* would allow for greater continuity of lands with residential permissions situated to the south, east and west of the subject lands, and would be compatible with the lands to the north that are currently designated in the City of Vaughan Official Plan predominately for commercial uses (e.g. office, retail, hotel, etc.).

Thank you for the opportunity to provide comments on the City's draft Official Plan. We reserve the right to provide additional comments in the future. Please do not hesitate to contact the undersigned should you have any questions.

Yours truly,
Weston Consulting
Per:



Ryan Guetter, BES, MCIP, RPP
Executive Vice President

c. Mark Flowers, Davies Howe LLP
Stephen, Elliott & Gary Title

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

June 3, 2025
File 3867

Attn: City of Vaughan Clerks Office

RE: City of Vaughan Official Plan Review – May 2025 Draft
H&L Title Inc. and Ledbury Investments Ltd.
9081 Weston Road (South of Rutherford Road and east of Weston Road)

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the "Owner"), the owners of the lands municipally known as 9081 Weston Road in the City of Vaughan (the "Site"). We are monitoring the City of Vaughan's Official Plan Review process on behalf of the Owner and previously submitted written correspondence on the Draft Vaughan Official Plan 2025 (the "Draft VOP") in a letter dated March 14, 2025 (Attachment 1). The purpose of this letter is to provide additional comments on the version of the Draft VOP released in May 2025 in advance of the Statutory Public Meeting on June 4, 2025.

City of Vaughan Official Plan Review

Land Use Designation and Urban Structure

As outlined in our March 2025 letter, the Site is located within the Vaughan Mills Centre Secondary Plan (VMCSP) area, which proposes to designate the Site *Prestige Office Employment* and *Prestige Employment.* Although the VMCSP is subject to appeals at the Ontario Land Tribunal (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 immediately south of the Site. As detailed in our March 2025 letter, it is our opinion that the *Prestige Office Employment* and *Prestige Employment* designations are not appropriate in the context of current provincial policy, which does not generally permit office or retail uses to be located in Employment Areas. Our March 2025 letter requested that Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed Use* and *High Rise Mixed Use* to provide appropriate transition between the residential neighbourhood to the west and the Vaughan Mills Shopping Centre to create a more integrated complete community with residential and non-residential densities. We note that Schedule 13 has not been updated in relation to the Site and request that Council direct Staff to revise Schedule 13 to appropriate mixed use designations, as noted above.

Urban Structure

As detailed in our March 2025 letter, Schedule 1 of the Draft VOP provided *Core Employment Areas* and *Supporting Employment Areas* categories, and the Site was proposed to be located within the *Core Employment Areas* category. We note the revised Draft VOP removes the C*ore Employment Areas* and *Supporting Employment Areas* categories and consolidates them into a single *Employment Areas* category of the Urban Structure. The revised Draft VOP continues to locate the Site within the *Employment Areas* and adjacent to a *Primary Centre* despite our March 2025 letter requesting the Site be removed from the *Employment Areas*.

Employment Areas are intended to be reserved for industrial, manufacturing, warehouse and related uses, including research and development and ancillary retail and office uses. Limiting the permitted uses primarily to

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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. We request Council direct Staff to revise Schedule 1 to remove the *Employment Areas* category and extend the *Primary Centre* Strategic Growth Area over the Site.

Employment Area Conversion Policies

Policy 2.2.4.4 and Policy 2.2.4.5 of the revised Draft VOP establish criteria for the conversion of lands in *Employment Areas* to uses other than manufacturing, warehouse, or ancillary uses directly related to a manufacturing or warehouse use. We have reviewed these policies and note that additional considerations are provided in the Draft VOP than those found in the *Provincial Planning Statement 2024* (PPS 2024). For example, the criteria in the Draft VOP requires that an *Employment Areas* conversion request demonstrate it will not impact the configuration of the *Employment Area.* They also require the request to demonstrate it will not impact the City's ability to provide a variety of land types and sizes in the Employment Area. They also require demonstration that the land to be converted is not required for Employment Area uses beyond 2051, which is beyond the proposed horizon of the Plan. In our opinion, the criteria for the conversion of lands in Employment Areas should be consistent with the PPS 2024 to provide clarity and consistency in the application of planning policies. We request that Council direct Staff to revise Policies 2.2.4.4 and 2.2.4.5 to be consistent with the PPS 2024.

Natural Heritage Framework

Our March 2025 letter requested that Schedule 2 be revised to remove the *Enhancement Area* identified on the Site as it does not reflect the existing condition. The revised Draft VOP continues to show the natural feature on Schedule 2; however, we note it has been relabeled as an area "*To be Determined Through Future Studies".* We understand these are areas with potential to contribute to the Natural Heritage Network subject to further study. Policy 2.7.3.17 of the Draft VOP states that,

> "*Enhancement Areas are undeveloped lands identified conceptually on Schedule 2 as 'To be Determined through Future Studies' and are important components of the Natural Heritage Network."*

Policy 2.7.3.18 states that,

> "*Enhancement Areas are not existing known Core Features, but have been identified as potential Core Features that require further study if proposed for Development or Site Alteration."*

Policy 2.7.3.1.9 states that,

> "*Enhancement Areas shown on Schedule 2 are approximate and the final location and boundary of the Enhancement Area shall be based on a natural heritage evaluation or Environmental Impact Study completed as part of the Development process*."

While we generally support the intent of these policies to determine the refinement of *Core Features* based on the findings of technical studies, we request the Draft VOP be further revised to clarify that an Official Plan Amendment would not be required if an Environment Impact Study determines the feature is not significant. That said, as outlined in our March 2025 letter, we continue to be of the opinion that Schedule 2 of the Draft VOP does not accurately reflect the existing condition and request Council direct Staff to revise Schedule 2 accordingly.

Road Classification

Our March 2025 letter requested the proposed road network on Schedules 9A, 9B and 9C of the Draft VOP be removed and we note the revised Draft VOP continues to show a proposed road network on these schedules. It continues to be our opinion that including a conceptual road network in the Draft VOP may create limitations for

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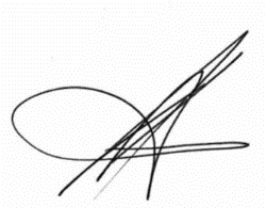
future development applications and the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application, with the exception of the extension of Bass Pro Mills Drive. We request Council direct Staff to revise these Schedules to remove the conceptual road network.

Weston Consulting will continue to monitor the Official Plan review process and reserves the right to provide further comments on this matter. We request to be notified of any future updates as well as any discussion pertaining to the applicable designations, overlays, and policies which have effect on the Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at extension 241 or Darrin Cohen at extension 329.

Yours truly,

Weston Consulting
Per:





Ryan Guetter, BES, MCIP, RPP
President

Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, March 14, 2025

c. H&L Title Inc. and Ledbury Investments Ltd.
Mark Flowers, Davies Howe LLP
Fausto Filipetto, Project Manager, City of Vaughan

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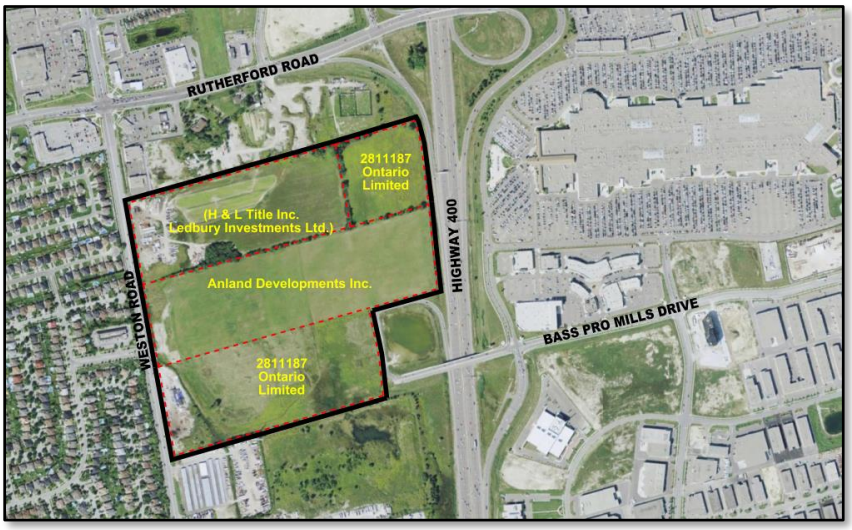


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In 2012 and 2014, landowners within the development block, including the Owner, appealed the 2010 Vaughan Official Plan (VOP 2010) and the Vaughan Mills Centre Secondary Plan (VMCSP), seeking to introduce non-employment use permissions on the western portion of the development block. As part of those appeals, the Owner sought to redesignate the Site within a *Primary Centre* and apply a mixed-use designation to permit residential uses with a range of heights and densities. 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, will 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, as reflected in amendments to the *Planning Act*, a new Provincial Planning Statement and the elimination of the Growth Plan for the Greater Golden Horseshoe, all of which occurred in October 2024.

The VOP 2010 identifies the Site within an *Employment Areas* and within the *Natural Areas and Countryside* according to Schedule 1 (Urban Structure). The Site is also located within the Vaughan Mills Centre Secondary Plan area.

City of Vaughan Official Plan Review

We have reviewed the draft policies and schedules of the Draft VOP released to date and are pleased to provide the following comments:

Land Use Designation and Urban Structure

Schedule 13 (Land Use Designations) of the Draft VOP identifies the Site within the Vaughan Mills Centre Secondary Plan (VMCSP). The VMCSP designates the Site *Prestige Office Employment* and *Prestige Employment*, although those designations are subject to appeals that remain before the OLT. In our opinion, *High Rise Mixed Use* and *Mid-Rise Mixed Use* designations are appropriate for the Site and should be depicted as such on Schedule 13 of the Draft VOP and within the VMCSP. According to Section 4.2.2 of the Draft VOP, the mixed use designations "*are primarily intended to support the evolution of Strategic Growth Areas into vibrant Complete Communities, with a range of housing and employment options, and services such as food stores, pharmacies, financial institutions, and restaurants within walking distance of residents*." The mixed-use designations permit both residential and non-residential uses on the same lot.

Based on the context of the Site between a residential neighbourhood and the Vaughan Mills Shopping Centre, the *Mid-Rise Mixed Use* and *High Rise Mixed Use* designations are appropriate and support the intent of Section 4.2.2. The introduction of the *Mid-Rise Mixed-Use* designation along Weston Road and *High Rise Mixed-Use* designation on the balance of the Site will provide appropriate transition between these two areas and create a more integrated complete community with residential and non-residential densities. By integrating new housing and job opportunities in proximity, it encourages the use of alternate forms of transportation and reduces the number and length of individual automobile trips which supports one of the policy objectives of the Draft VOP for Mixed Use areas.

It is our opinion that the land use designation identified in the VMCSP is not appropriate in the context of the provincial policy direction, which does not permit office or retail use to be located in Employment Areas. According to the new definition of "area of employment" established in Section 1 of the *Planning Act,* as of October 2024, 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. The VMCSP identifies the entirety of the Vaughan Mills Centre as being a Priority Area for intensification and envisions intensification and redevelopment throughout all areas of the secondary plan area. Additionally, the VMCSP seeks to create a complete and well-integrated mixed-use urban centre that promotes connectivity throughout the area, including across Highway 400 which is further supported by the future Bass Pro Mills Drive extension. The *High Rise Mixed Use* and *Mid Rise Mixed Use* designations for the Site will support the goal of the VMCSP and should be reflected on Schedule 13 of the Draft VOP. Accordingly, we request Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed Use* and *High Rise Mixed Use*.

Urban Structure

The Draft VOP identifies two categories for Employment Areas: *Core Employment Areas*, which are areas that meet the amended definition of "area of employment" in Section 1 of the *Planning Act*, and *Supporting Employment Areas*, which do not meet the definition of "area of employment" and permit a broader range of uses including standalone office and retail uses. The Site is located within a *Core Employment Area* according to draft Schedule 1 (Urban Structure), with lands designated *Supporting Employment Areas* to the east and south of the Site within the balance of the development block.



Figure 2: Schedule 1 of the Draft VOP: Urban Structure

The Draft VOP also establishes a hierarchy of Strategic Growth Areas, which include *Primary Centres* and *Primary Intensification Corridors*. Draft Schedule 1A identifies the southern portion of Rutherford Road as a *Primary Intensification Corridor within Employment Areas* and the northern portion of Rutherford Road as a *Primary Intensification Corridor*. The lands east of the Site, across Highway 400, are identified as a *Primary Centre*. Policy 2.2.1.1 describes these Strategic Growth Areas:

> *ii. Primary Centres are locations of Intensification accommodated in the form of predominantly mixed-use high- and mid-rise buildings, developed at an intensity that is supportive of transit;*
>
> *vi. Primary Intensification Corridors link together the various centres on transit supportive corridors and will be places to accommodate Intensification in the form of mixed-use Mid-Rise Buildings, limited mixed-use High-Rise Buildings and Low-Rise Buildings;*



Figure 3: Schedule 1A of the Draft VOP: Strategic Growth Areas

In our opinion, the *Core Employment Area* category is not appropriate for the Site as it represents a transitional area between an established residential neighbourhood and the Vaughan Mills Shopping Centre. Lands within the *Core 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 Site due to its location between a *Primary Centre* to the east and an established residential neighbourhood to the west. As discussed above, the Site should be redesignated *Mid Rise Mixed Use* and *High Rise Mixed Use* to support an appropriate development pattern that will create an integrated and complete community.

As such, we request the *Primary Centre* Strategic Growth Area be extended to the Site. It should be noted that the Site and broader Development Block have remained largely vacant for several years despite historically being designated for employment uses.

Policy 2.2.2.4 of the Draft VOP states that *Primary Centres* shall be planned to:

a. *Develop with a mix of housing types and tenures, including housing suitable for seniors and families with children and Affordable Housing and Attainable Housing*
b. *include a mix of non-residential uses, including Retail, office, institutional, Community Facilities, and Human Services intended to serve both the local population and the City as a whole, and attract activity throughout the day;*
c. *develop at densities supportive of planned public transit;*
d. *have a fine grain multimodal 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;*
e. *include an appropriate amount of well-designed public open spaces appropriate to the local context, including City-owned parks;*

f. encourage a pedestrian-friendly built form by locating active uses at grade; and
g. be designed and developed to implement appropriate transition of intensity and use to surrounding Community Areas, and/or compatibility with adjacent Employment Areas

Furthermore, we note that the Site is not located in proximity to major Rail Facilities, which is described as an important feature of *Core Employment Areas* within the Draft VOP. According to Section 2.2.4,

> *Core Employment Areas also include the City's major Rail Facilities, identified on Schedule 1. Rail-related policies are included in Section 3.9. Close proximity to highway access and providing appropriate frontage for these facilities is important.*

It should be noted that we are coordinating with the adjacent landowners to prepare a concept that will demonstrate how mixed-use development can support residential and non-residential growth within the development block between Weston Road and Highway 400 as part of a complete community.

Natural Heritage Framework

According to Schedule 2 of the Draft VOP, an *Enhancement Area* is identified on the Site (Figure 4). According to Policy 3.6.3.16, *Enhancement Areas are undeveloped lands identified conceptually on Schedule 2 and are important components of the Natural Heritage Network because they have 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.



Figure 4: Draft Schedule 2 of the Draft VOP: Natural Heritage Network

Policy 3.6.3.17 states that,

> *Enhancement Areas shown on Schedule 2 are approximate and the final location and boundary of the Enhancement Area will be based on a natural heritage evaluation or Environmental Impact Study completed as part of the Development process.*

Furthermore, Policy 3.6.3.20 states that,

> *Enhancement Areas as determined by policy 3.6.3.17 above will be incorporated into the Natural Heritage Network as Core Features and/or open space designations and conveyed to the City as a condition of Development approval. Such changes do not require amendment to this Plan*.

We support the intent of these policies to allow for the refinement of *Enhancement Areas* based on the findings of an Environmental Impact Study (EIS) without an Official Plan Amendment. However, it should be noted that the *Enhancement Area* depicted on Schedule 2 of the Draft VOP does not accurately reflect the existing conditions on the Site. A portion of Black Creek currently traverses north-south along the westerly boundary of the Site. Schedule 2 should be revised to remove the *Enhancement Area* depicted as does not reflect the existing condition on the Site. It is noted that the VMSCP contemplates the realignment of Black Creek; however this will be addressed through a formal development application review process.

Road Classifications

According to Schedules 9A, 9B and 9C of the Draft VOP, a proposed road network is identified on the Site consisting of two north-south Minor Collector Streets and one east-west Local Street. In our opinion, including the proposed conceptual street network through the Site is inappropriate. Including a conceptual road network in the Draft VOP may create limitations for future development applications. With the exception of the extension of Bass Pro Mills Drive, the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application. We request the road network on Schedules 9A, 9B and 9C of the Draft VOP be removed.

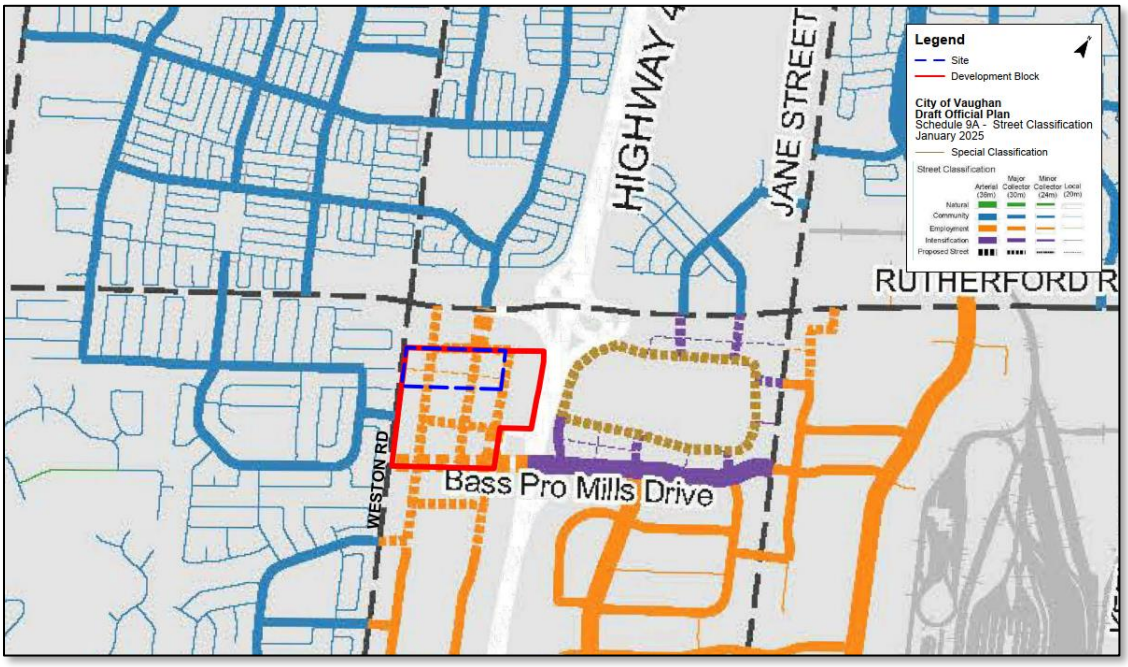


Figure 5: Draft Schedule 9A of the Draft VOP: Street Classification

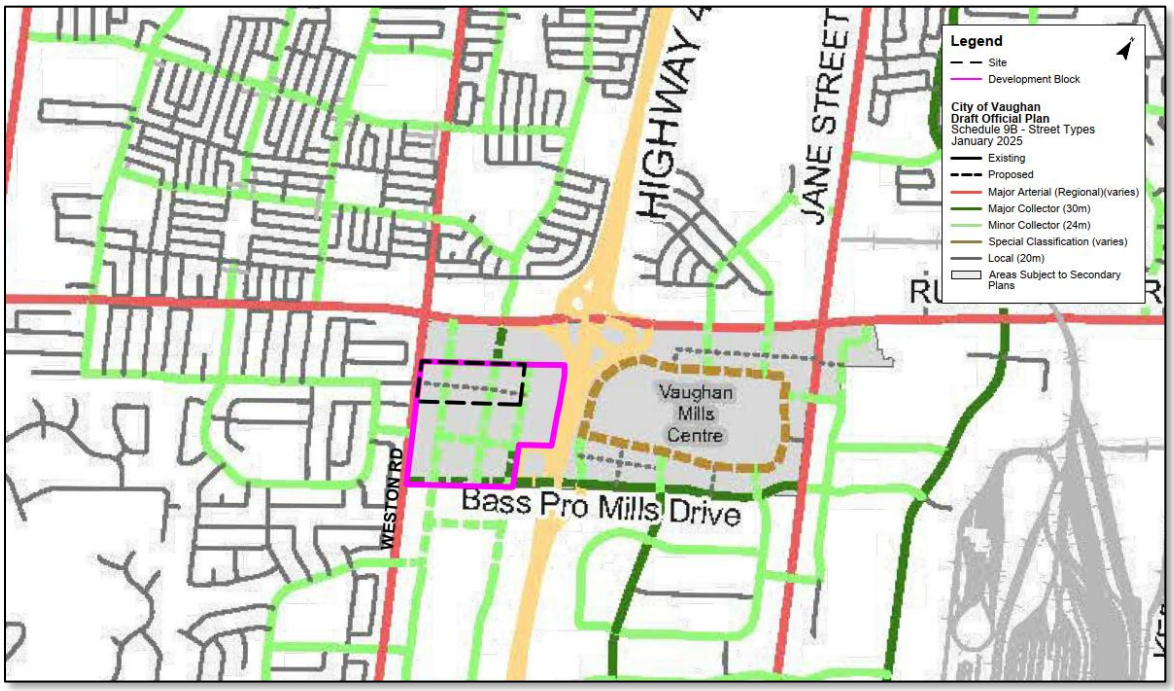


Figure 6: Draft Schedule 9B: Street Types

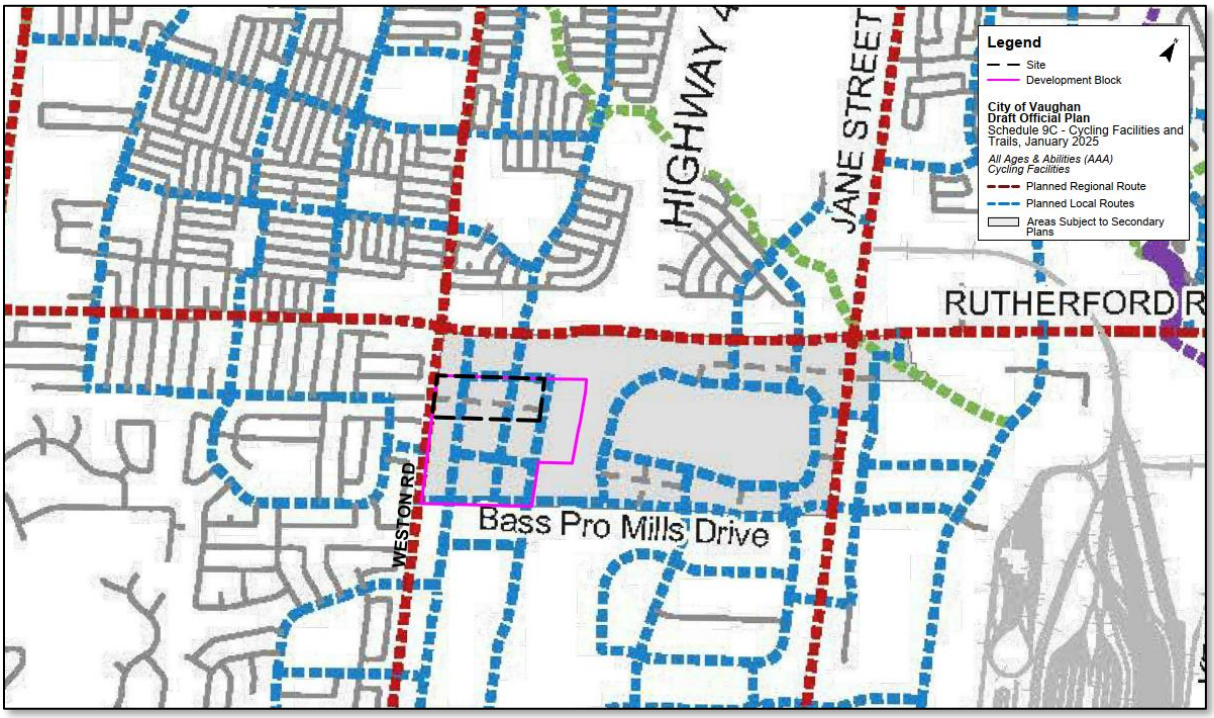


Figure 7: Draft Schedule 9C: Cycling Facilities and Trails

Transition

Section 1.4.2 of the Draft VOP provides transition policies that will repeal VOP 2010 subject to the criteria of Policy 1.4.2.1 to Policy 1.4.2.2. Applications in process will also be subject to transition policies established in the Draft VOP. We note that certain matters of VOP 2010 for the lands west of Highway 400, including the Site, have been appealed to the OLT and are yet to be disposed of fully.

Section 1.4.2.1 of the Draft VOP provides transition policies for the repeal of VOP 2010. According to Policy 1.4.2.1(b),

> *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 for the following secondary plan areas:*
>
> *i. The "Weston Road and Highway 7" area shown on Schedule 14A; and*
> *ii. The "Vaughan Metropolitan Centre" area shown on Schedule 14A.*

It is our understanding that the policies and schedules of the VMCSP will continue to apply to the Site; however, these policies and schedules, as they relate to the lands west of Highway 400, are under appeal to the OLT. Based on the analysis provided in this letter, it is our opinion that *Mid-Rise Mixed Use* and *High-Rise Mixed-Use* designations are appropriate for the Site and should be depicted on Schedule 13 (Land Use) of the Draft VOP. The extension of the *Primary Centre* Strategic Growth Area category to include the Site supports this objective.

Conclusion

In summary, we are pleased to provide the following requests:

- Revised Schedule 13 of the Draft VOP to designate the Site *Mid Rise Mixed Use* along Weston Road and *High Rise Mixed Use* for the balance of the Site.
- Revise Schedule 1 of the Draft VOP to remove the *Core Employment Area* and apply the *Strategic Growth Area* to the Site.
- Revise Schedule 1A to extend the *Primary Centre* category to the Site to permit a mix of uses in support of a complete community.
- Revise Schedules 9A, 9B and 9C to remove the conceptual road pattern.
- Revise Schedule 2 to remove the *Enhancement Areas* on the Site.

Weston Consulting will continue to monitor the Official Plan Review process and reserves the right to provide further comments on this matter. We request to be notified on any future updates as well as any discussion pertaining to the designations and policies pertaining to the Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at ext. 241, Darrin Cohen at extension 329, or James Todd at extension 345.

Yours truly,
Weston Consulting
Per:

Ryan Guetter, BES, MCIP, RPP
President

Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, October 3, 2023

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

City Council
City of Vaughan
2141 Major Mackenzie Drive West
Vaughan, ON, L6A 1P7

October 3, 2023
File 3867

RE: City of Vaughan Official Plan Review
H&L Title Inc. and Ledbury Investments Ltd.
South of Rutherford Road and east of Weston Road

Weston Consulting is the planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (collectively, the "Owners"), the owners of the lands consisting of approximately 10.1 hectares located south of Rutherford Road and east of Weston Road, in the City of Vaughan (the "subject lands"). The subject lands are located in the southeastern quadrant of the Weston Road and Rutherford Road intersection in the City of Vaughan and are situated west of Highway 400. The purpose of this letter is to provide formal comments on the City of Vaughan's Official Plan Review and the draft materials that have been released for review and comment. As additional draft materials are released, we may provide further comments.

On November 4, 2022, the Ministry of Municipal Affairs and Housing modified and approved the new York Region Official Plan. The nature of the modifications included redesignating certain lands throughout the Region. As per the Minister's direction, the lands adjacent to the subject lands to the east and south were redesignated from an *Employment Area* designation to *Community Area*, as per Map 1A, Land Use Designations (see Figure 1 below). The subject lands were not redesignated by the Minister's decision and maintained an *Employment Area* designation.

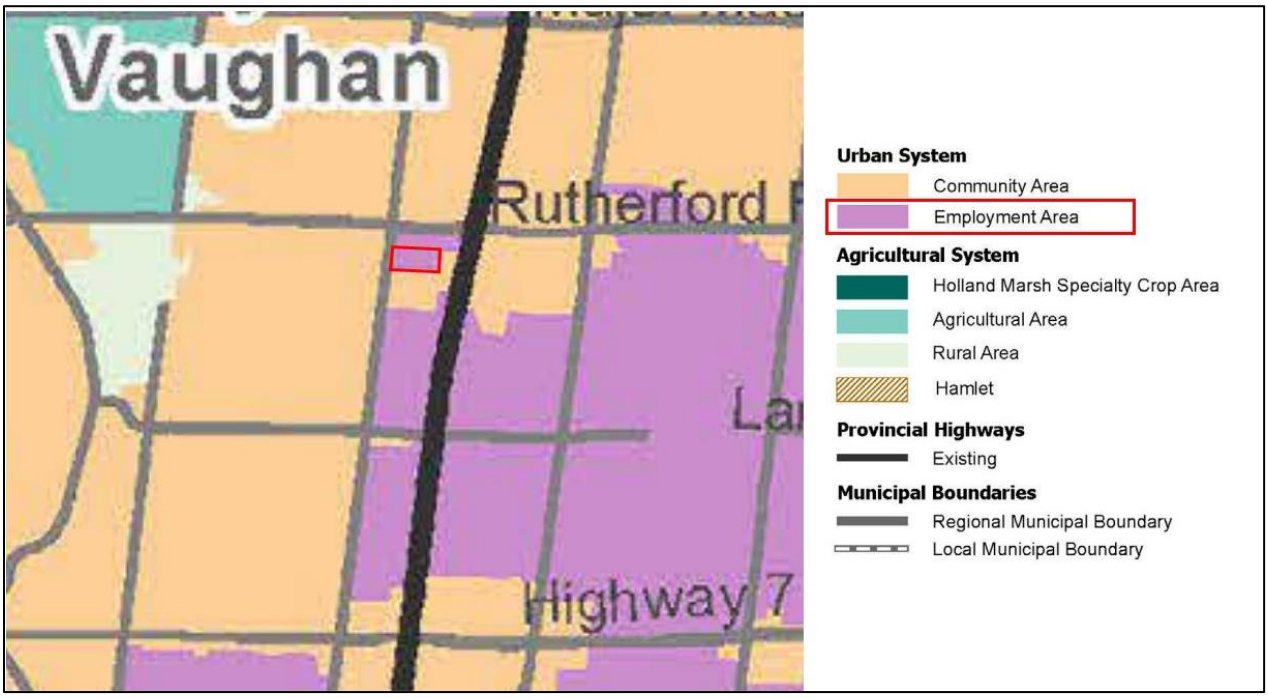


Figure 1: York Region Official Plan, Map 1A, Land Use Designations

Based on draft Schedule 1, Urban Structure of the City of Vaughan Official Plan, the land use designations of the subject lands are identified as *Employment Area,* whereas the adjacent lands are not consistent with the Minister's land use modifications to the York Region Official Plan on November 4, 2022. Notably, in the south east quadrant of Weston Road and Rutherford Road, the *Community Area* designation as per draft City of Vaughan Official Plan Schedule 1 is not consistent with the *Community Area* designation per York Region's Map 1A, Land Use Designations, with the City's draft Schedule 1 identifying lands immediately south of the subject lands as *Employment Area* whereas these lands are designated as *Community Area* in the York Region Official Plan (see Figure 2 below).

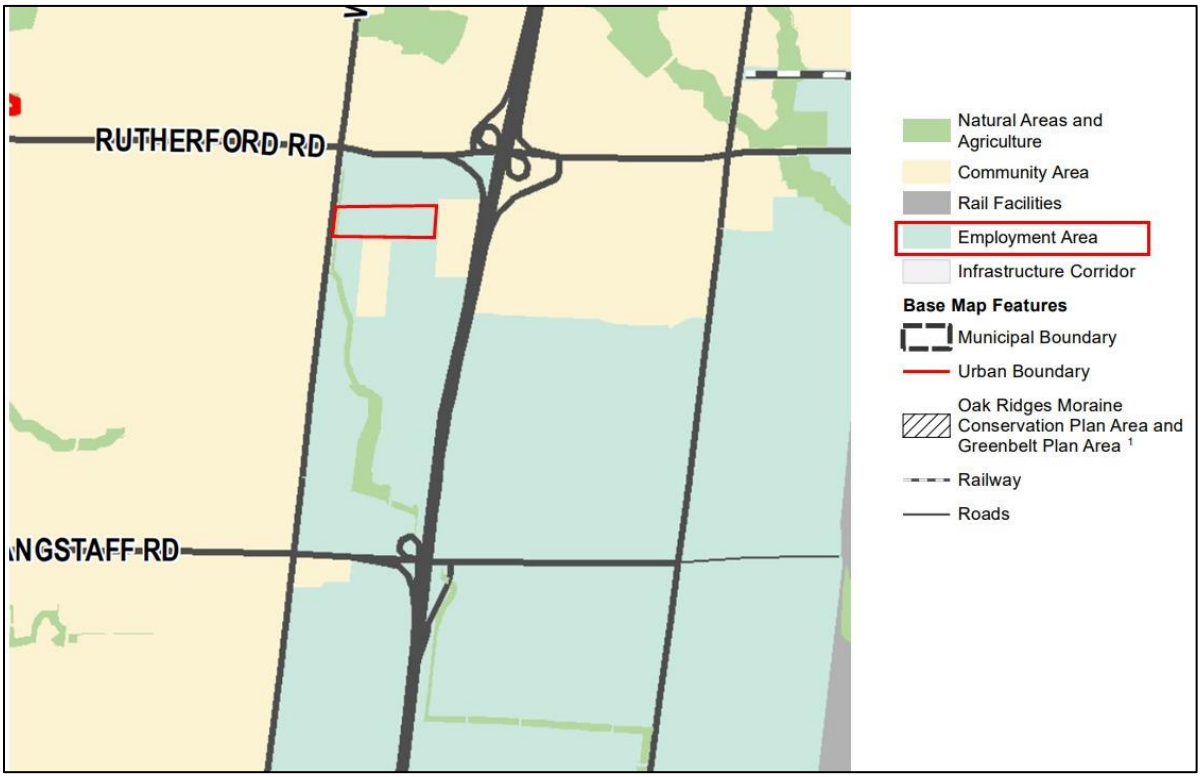


Figure 2: Draft City of Vaughan Official Plan, Schedule 1, Urban Structure

As a result of the inconsistency between the approved York Region Official Plan Map 1A and draft City of Vaughan Official Plan Schedule 1, the Owners request that the City revise the land use designation on Schedule 1, Urban Structure to ensure consistency with the Minster's decision on November 4, 2022. Further, we recommend that the City take steps to incorporate the subject lands as part of the *Community Area* in order to provide greater continuity of the land use designation and ultimately avoid orphaned *Employment Area* parcels in the City. The redesignation of the lands to *Community Area* would allow for greater continuity of lands with residential permissions situated to the south, east and west of the subject lands, and would be compatible with the lands to the north that are currently designated in the City of Vaughan Official Plan predominately for commercial uses (e.g. office, retail, hotel, etc.).

Thank you for the opportunity to provide comments on the City's draft Official Plan. We reserve the right to provide additional comments in the future. Please do not hesitate to contact the undersigned should you have any questions.

Yours truly,
Weston Consulting
Per:



Ryan Guetter, BES, MCIP, RPP
Executive Vice President

c. Mark Flowers, Davies Howe LLP
Stephen, Elliott & Gary Title

WESTON CONSULTING

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

September 29, 2025
File 3867

Attn: City of Vaughan Clerks Office

RE: Committee of the Whole Agenda Item 6.1
Draft Vaughan Official Plan 2025
9081 Weston Road

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the "**Owner**"), with respect to the lands municipally known as 9081 Weston Road in the City of Vaughan (the "**Subject Property**" or "**Site**"). The Site forms part of a larger development block that includes lands to the immediate south of the Site (the "**Development Block**").

The purpose of this letter is to provide comments on the Draft Vaughan Official Plan 2025 (the "**Draft VOP**") that is recommended for adoption by Council at the September 30, 2025, Committee of the Whole meeting. We have been actively monitoring and participating in the Official Plan Review process on behalf of the Owner and previously submitted correspondence on the Draft VOP in letters dated March 14, 2025 (Attachment 1) and June 3, 2025 (Attachment 2) and provided oral submission at the Statutory Public Meeting on June 4, 2025 (collectively, the "**Previous Submissions**"). This letter is intended to be read in conjunction with the Previous Submissions.

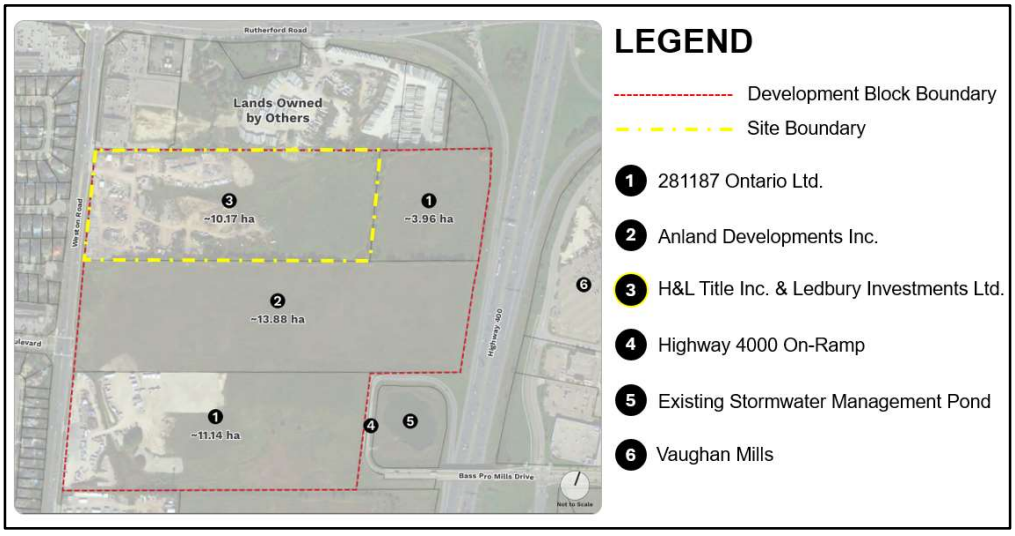


Figure 1: Subject Property and Development Block

City of Vaughan Draft Official Plan

We have reviewed the latest version of the Draft VOP and note that our previous requests for revisions have not been implemented. Accordingly, we are writing to provide the following comments which reiterate our requests from the Previous Submissions.

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TORONTO OFFICE | 268 Berkeley Street, Toronto, Ontario, M5A 2X5 | T. 416.640.9917
westonconsulting.com
1.800.363.3558 F. 905.738.6637

Land Use Designation and Urban Structure

The Subject Property is located within the Vaughan Mills Centre Secondary Plan (the "**VMCSP**") area, which proposes to designate the Site *Prestige Office Employment* and *Prestige Employment.* Although the VMCSP remains subject to appeals at the Ontario Land Tribunal (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 Site.

It continues to be our opinion that the *Prestige Office Employment* and *Prestige Employment* designations are not appropriate in the context of current provincial policy. Our Previous Submissions requested that Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed* Use and *High Rise Mixed Use* to provide appropriate transition between the residential neighbourhood to the west and the Vaughan Mills Shopping Centre east of Highway 400 to create a more integrated complete community with residential and non-residential uses with a mix of densities. We request that Council direct Staff to revise Schedule 13 to designate the Site *Mid Rise Mixed Use* (immediately east of Weston Road) and *High Rise Mixed Use.*

Urban Structure

Schedule 1 (Urban Structure) of the Draft VOP continues to locate the Site within an *Employment Area* and adjacent to a Strategic Growth Area. *Employment Areas* are intended to be reserved for industrial, manufacturing, warehousing and related uses, including research and development and ancillary retail and office uses. Limiting the permitted uses 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. As outlined in the Previous Submissions, it is our opinion that the *Employment Areas* category is not appropriate and we request that Council direct Staff to revise Schedule 1 to remove the *Employment Areas* category and extend the *Primary Centre* Strategic Growth Area over the Site.

Employment Area Conversion Policies

Our Previous Submissions noted the Draft VOP provides additional consideration for the conversion of land in *Employment Areas* than the *Provincial Planning Statement 2024* (the "**PPS 2024**"). Policy 2.2.4.4 and 2.2.4.5 of the Draft VOP requires that an *Employment Areas* conversion request demonstrate:

- It will not impact the configuration of the Employment Area;
- It will not impact the City's ability to provide a variety of land types and sizes in the Employment Area; and
- The land to be converted is not required for Employment Area uses beyond 2051, which is beyond the proposed horizon of the Plan.

In continues to be our opinion that criteria for the conversion of lands in *Employment Areas* should be consistent with the PPS 2024 to provide clarity and consistency in the application of planning policies. We request that Council direct Staff to revise Policies 2.2.4.4 and 2.2.4.5 to be consistent with the PPS 2024.

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Natural Heritage Framework

Schedule 2 (Natural Heritage Network) of the Draft VOP continues to show an area *To be Determined Through Future Studies* on the Site. We understand these are areas with potential to contribute to the Natural Heritage Network subject to further study, as outlined in draft policies 2.7.3.17 to 2.7.3.22. While we generally support the intent of these policies to refine *Core Features* based on the findings of technical studies, we request the Draft VOP be updated to clarify that an Official Plan Amendment would not be required if an Environmental Impact Study determines the feature is not significant. As outlined in our Previous Submissions, it is our opinion that Schedule 2 of the Draft VOP does not accurately reflect the existing condition and we request Council direct Staff to revise Schedule 2 accordingly.

Road Classification

The Draft VOP continues to show a proposed road network through the Site on Schedules 9A, 9B and 9C. In our opinion, including a conceptual road network in the Official Plan may create limitations for future development applications, and that the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application, excluding the extension of Bass Pro Mills Drive. We request Council direct Staff to revise these Schedules to remove the conceptual road network accordingly.

Transition Policies

Section 1.3.1 of the Draft VOP includes transition policies which repeal the VOP 2010 and the York Region Official Plan 2022 (as it applies to lands within the City of Vaughan), but specifically maintains the applicability of Volume 2 of VOP 2010 for lands shown on Schedule 14A (Areas Subject to Secondary Plans), and the Regional Street Network on Map 11 of the Regional Official Plan. As a result, portions of the VMCSP remain in effect, while planned street widths in the area surrounding the Subject Property, specifically Rutherford Road and Weston Road, are still applicable.

In our opinion, the transition policies fail to provide sufficient guidance for the consideration of ongoing Secondary Plan processes, especially those where land uses being established through these plans do not align with those being brought forward through the Draft VOP. We request Council direct Staff to revise Section 1.3.2 to contain direct guidance for these types of policy conflicts which may emerge, and include language such that an amendment to the Official Plan is not required.

Appeals

In 2012 and 2014, landowners within the Development Block, including the Owner, appealed the 2010 Vaughan Official Plan (the "**VOP 2010**") and the VMCSP, seeking to introduce non-employment use permissions on the western portion of the Development Block. As part of those appeals, the Owner sought to redesignate the Site within a Primary Centre and apply a mixed-use designation to permit residential uses with a range of heights and densities. 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, will 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.

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Since the time of that interim decision, there have been significant legislative and policy changes regarding employment areas, as reflected in amendments to the Planning Act, the PPS 2024 and the elimination of the Growth Plan for the Greater Golden Horseshoe, all of which occurred in October 2024.

Conceptual Master Plan

Notwithstanding the requests outlined in this letter and in Previous Submissions, we have been working with the adjacent owners within the Development Block to prepare a conceptual Master Plan for the Development Block to establish a proposed land use schedule, road network, and phasing plan that aligns with the legislative and policy changes made in October 2024. The conceptual Master Plan contemplates mixed use development on the west side of the Development Block and maintains a significant portion of employment type uses on the east side of the Development Block. Overall, the Master Plan proposes to maintain a significant amount of jobs and employment uses within the Development Block and fulfills current provincial and municipal policy objectives for additional housing supply and complete communities. We continue to request the revisions to the Draft VOP outlined in this letter and in Previous Submissions and maintain that the *Employment Areas* designation is not appropriate for the Site or the Development Block. In our opinion, extending the *Primary Centre* Strategic Growth Area to the Site and other lands west of Highway 400 fulfills applicable provincial and municipal planning policies.

Conclusion

We request that Council direct Staff to revise the Draft VOP based on the comments provided in this letter and our Previous Submissions. However, we continue to work with the adjacent landowners to refine a conceptual Master Plan that introduces a mixed use designations on the western portion of the Development Block and retains jobs and employment growth over the entire Development Block.

Thank you for the opportunity to provide comments on the Draft VOP. We will continue to monitor the Official Plan review process and reserve the right to provide further comments on this matter. We request to be notified of any future updates as well as any discussion pertaining to the applicable designations, overlays, and policies which have effect on the Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at extension 241 or Darrin Cohen at extension 329.

Yours truly,

Weston Consulting
Per:

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Ryan Guetter, BES, MCIP, RPP
President

Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, October 3, 2023
City of Vaughan Official Plan Review Commenting Letter, March 14, 2025
City of Vaughan Official Plan Review Commenting Letter, June 3, 2025

c. H&L Title Inc. and Ledbury Investments Ltd.
Mark Flowers, Davies Howe LLP
Fausto Filipetto, Project Manager, City of Vaughan

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

June 3, 2025
File 3867

Attn: City of Vaughan Clerks Office

RE: City of Vaughan Official Plan Review – May 2025 Draft
H&L Title Inc. and Ledbury Investments Ltd.
9081 Weston Road (South of Rutherford Road and east of Weston Road)

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the "Owner"), the owners of the lands municipally known as 9081 Weston Road in the City of Vaughan (the "Site"). We are monitoring the City of Vaughan's Official Plan Review process on behalf of the Owner and previously submitted written correspondence on the Draft Vaughan Official Plan 2025 (the "Draft VOP") in a letter dated March 14, 2025 (Attachment 1). The purpose of this letter is to provide additional comments on the version of the Draft VOP released in May 2025 in advance of the Statutory Public Meeting on June 4, 2025.

City of Vaughan Official Plan Review

Land Use Designation and Urban Structure

As outlined in our March 2025 letter, the Site is located within the Vaughan Mills Centre Secondary Plan (VMCSP) area, which proposes to designate the Site *Prestige Office Employment* and *Prestige Employment.* Although the VMCSP is subject to appeals at the Ontario Land Tribunal (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 immediately south of the Site. As detailed in our March 2025 letter, it is our opinion that the *Prestige Office Employment* and *Prestige Employment* designations are not appropriate in the context of current provincial policy, which does not generally permit office or retail uses to be located in Employment Areas. Our March 2025 letter requested that Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed Use* and *High Rise Mixed Use* to provide appropriate transition between the residential neighbourhood to the west and the Vaughan Mills Shopping Centre to create a more integrated complete community with residential and non-residential densities. We note that Schedule 13 has not been updated in relation to the Site and request that Council direct Staff to revise Schedule 13 to appropriate mixed use designations, as noted above.

Urban Structure

As detailed in our March 2025 letter, Schedule 1 of the Draft VOP provided *Core Employment Areas* and *Supporting Employment Areas* categories, and the Site was proposed to be located within the *Core Employment Areas* category. We note the revised Draft VOP removes the C*ore Employment Areas* and *Supporting Employment Areas* categories and consolidates them into a single *Employment Areas* category of the Urban Structure. The revised Draft VOP continues to locate the Site within the *Employment Areas* and adjacent to a *Primary Centre* despite our March 2025 letter requesting the Site be removed from the *Employment Areas*.

Employment Areas are intended to be reserved for industrial, manufacturing, warehouse and related uses, including research and development and ancillary retail and office uses. Limiting the permitted uses primarily to

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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. We request Council direct Staff to revise Schedule 1 to remove the *Employment Areas* category and extend the *Primary Centre* Strategic Growth Area over the Site.

Employment Area Conversion Policies

Policy 2.2.4.4 and Policy 2.2.4.5 of the revised Draft VOP establish criteria for the conversion of lands in *Employment Areas* to uses other than manufacturing, warehouse, or ancillary uses directly related to a manufacturing or warehouse use. We have reviewed these policies and note that additional considerations are provided in the Draft VOP than those found in the *Provincial Planning Statement 2024* (PPS 2024). For example, the criteria in the Draft VOP requires that an *Employment Areas* conversion request demonstrate it will not impact the configuration of the *Employment Area.* They also require the request to demonstrate it will not impact the City's ability to provide a variety of land types and sizes in the Employment Area. They also require demonstration that the land to be converted is not required for Employment Area uses beyond 2051, which is beyond the proposed horizon of the Plan. In our opinion, the criteria for the conversion of lands in Employment Areas should be consistent with the PPS 2024 to provide clarity and consistency in the application of planning policies. We request that Council direct Staff to revise Policies 2.2.4.4 and 2.2.4.5 to be consistent with the PPS 2024.

Natural Heritage Framework

Our March 2025 letter requested that Schedule 2 be revised to remove the *Enhancement Area* identified on the Site as it does not reflect the existing condition. The revised Draft VOP continues to show the natural feature on Schedule 2; however, we note it has been relabeled as an area "*To be Determined Through Future Studies".* We understand these are areas with potential to contribute to the Natural Heritage Network subject to further study. Policy 2.7.3.17 of the Draft VOP states that,

> "*Enhancement Areas are undeveloped lands identified conceptually on Schedule 2 as 'To be Determined through Future Studies' and are important components of the Natural Heritage Network."*

Policy 2.7.3.18 states that,

> "*Enhancement Areas are not existing known Core Features, but have been identified as potential Core Features that require further study if proposed for Development or Site Alteration."*

Policy 2.7.3.1.9 states that,

> "*Enhancement Areas shown on Schedule 2 are approximate and the final location and boundary of the Enhancement Area shall be based on a natural heritage evaluation or Environmental Impact Study completed as part of the Development process*."

While we generally support the intent of these policies to determine the refinement of *Core Features* based on the findings of technical studies, we request the Draft VOP be further revised to clarify that an Official Plan Amendment would not be required if an Environment Impact Study determines the feature is not significant. That said, as outlined in our March 2025 letter, we continue to be of the opinion that Schedule 2 of the Draft VOP does not accurately reflect the existing condition and request Council direct Staff to revise Schedule 2 accordingly.

Road Classification

Our March 2025 letter requested the proposed road network on Schedules 9A, 9B and 9C of the Draft VOP be removed and we note the revised Draft VOP continues to show a proposed road network on these schedules. It continues to be our opinion that including a conceptual road network in the Draft VOP may create limitations for

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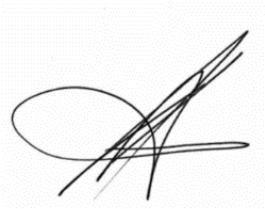
future development applications and the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application, with the exception of the extension of Bass Pro Mills Drive. We request Council direct Staff to revise these Schedules to remove the conceptual road network.

Weston Consulting will continue to monitor the Official Plan review process and reserves the right to provide further comments on this matter. We request to be notified of any future updates as well as any discussion pertaining to the applicable designations, overlays, and policies which have effect on the Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at extension 241 or Darrin Cohen at extension 329.

Yours truly,

Weston Consulting
Per:





Ryan Guetter, BES, MCIP, RPP
President

Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, March 14, 2025

c. H&L Title Inc. and Ledbury Investments Ltd.
Mark Flowers, Davies Howe LLP
Fausto Filipetto, Project Manager, City of Vaughan

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WESTON CONSULTING

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City of Vaughan
2141 Major Mackenzie Drive
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March 14, 2025
File 3867

Attn: Fausto Filipetto, Project Manager

RE: Comments on the Draft Vaughan Official Plan 2025
9081 Weston Road

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the "Owner"), the owners of the lands municipally known as 9081 Weston Road (the "Site"). We are monitoring the City of Vaughan's Official Plan Review process on behalf of the Owner and are pleased to provide the following comments on the Draft Vaughan Official Plan 2025 (the "Draft VOP") as it relates to the Site. We previously submitted written correspondence on the Official Plan Review in a letter dated October 3, 2023 (attached).

Site Context

The Site is part of a broader development block that 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 (Figure 1).

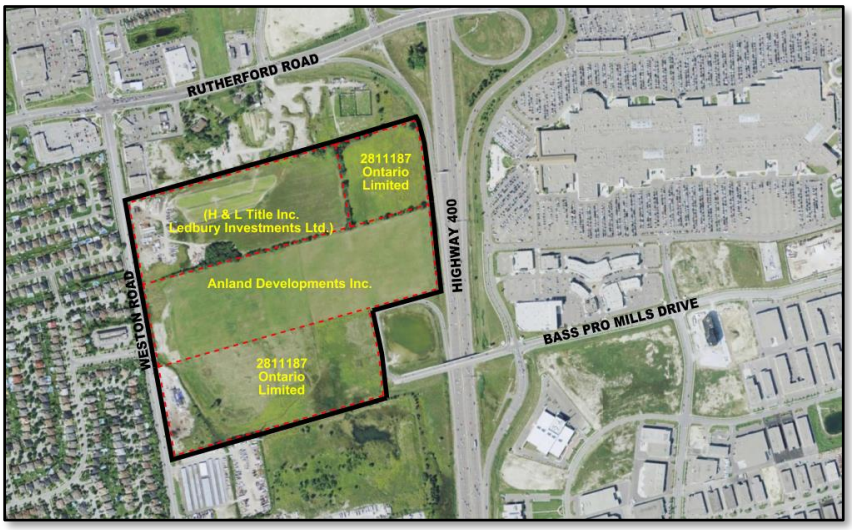


Figure 1: Map of Development Block of Landowners

In 2012 and 2014, landowners within the development block, including the Owner, appealed the 2010 Vaughan Official Plan (VOP 2010) and the Vaughan Mills Centre Secondary Plan (VMCSP), seeking to introduce non-employment use permissions on the western portion of the development block. As part of those appeals, the Owner sought to redesignate the Site within a *Primary Centre* and apply a mixed-use designation to permit residential uses with a range of heights and densities. 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, will 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, as reflected in amendments to the *Planning Act*, a new Provincial Planning Statement and the elimination of the Growth Plan for the Greater Golden Horseshoe, all of which occurred in October 2024.

The VOP 2010 identifies the Site within an *Employment Areas* and within the *Natural Areas and Countryside* according to Schedule 1 (Urban Structure). The Site is also located within the Vaughan Mills Centre Secondary Plan area.

City of Vaughan Official Plan Review

We have reviewed the draft policies and schedules of the Draft VOP released to date and are pleased to provide the following comments:

Land Use Designation and Urban Structure

Schedule 13 (Land Use Designations) of the Draft VOP identifies the Site within the Vaughan Mills Centre Secondary Plan (VMCSP). The VMCSP designates the Site *Prestige Office Employment* and *Prestige Employment*, although those designations are subject to appeals that remain before the OLT. In our opinion, *High Rise Mixed Use* and *Mid-Rise Mixed Use* designations are appropriate for the Site and should be depicted as such on Schedule 13 of the Draft VOP and within the VMCSP. According to Section 4.2.2 of the Draft VOP, the mixed use designations "*are primarily intended to support the evolution of Strategic Growth Areas into vibrant Complete Communities, with a range of housing and employment options, and services such as food stores, pharmacies, financial institutions, and restaurants within walking distance of residents*." The mixed-use designations permit both residential and non-residential uses on the same lot.

Based on the context of the Site between a residential neighbourhood and the Vaughan Mills Shopping Centre, the *Mid-Rise Mixed Use* and *High Rise Mixed Use* designations are appropriate and support the intent of Section 4.2.2. The introduction of the *Mid-Rise Mixed-Use* designation along Weston Road and *High Rise Mixed-Use* designation on the balance of the Site will provide appropriate transition between these two areas and create a more integrated complete community with residential and non-residential densities. By integrating new housing and job opportunities in proximity, it encourages the use of alternate forms of transportation and reduces the number and length of individual automobile trips which supports one of the policy objectives of the Draft VOP for Mixed Use areas.

It is our opinion that the land use designation identified in the VMCSP is not appropriate in the context of the provincial policy direction, which does not permit office or retail use to be located in Employment Areas. According to the new definition of "area of employment" established in Section 1 of the *Planning Act,* as of October 2024, 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. The VMCSP identifies the entirety of the Vaughan Mills Centre as being a Priority Area for intensification and envisions intensification and redevelopment throughout all areas of the secondary plan area. Additionally, the VMCSP seeks to create a complete and well-integrated mixed-use urban centre that promotes connectivity throughout the area, including across Highway 400 which is further supported by the future Bass Pro Mills Drive extension. The *High Rise Mixed Use* and *Mid Rise Mixed Use* designations for the Site will support the goal of the VMCSP and should be reflected on Schedule 13 of the Draft VOP. Accordingly, we request Schedule 13 of the Draft VOP be revised to designate the Site *Mid Rise Mixed Use* and *High Rise Mixed Use*.

Urban Structure

The Draft VOP identifies two categories for Employment Areas: *Core Employment Areas*, which are areas that meet the amended definition of "area of employment" in Section 1 of the *Planning Act*, and *Supporting Employment Areas*, which do not meet the definition of "area of employment" and permit a broader range of uses including standalone office and retail uses. The Site is located within a *Core Employment Area* according to draft Schedule 1 (Urban Structure), with lands designated *Supporting Employment Areas* to the east and south of the Site within the balance of the development block.



Figure 2: Schedule 1 of the Draft VOP: Urban Structure

The Draft VOP also establishes a hierarchy of Strategic Growth Areas, which include *Primary Centres* and *Primary Intensification Corridors*. Draft Schedule 1A identifies the southern portion of Rutherford Road as a *Primary Intensification Corridor within Employment Areas* and the northern portion of Rutherford Road as a *Primary Intensification Corridor*. The lands east of the Site, across Highway 400, are identified as a *Primary Centre*. Policy 2.2.1.1 describes these Strategic Growth Areas:

> *ii. Primary Centres are locations of Intensification accommodated in the form of predominantly mixed-use high- and mid-rise buildings, developed at an intensity that is supportive of transit;*
>
> *vi. Primary Intensification Corridors link together the various centres on transit supportive corridors and will be places to accommodate Intensification in the form of mixed-use Mid-Rise Buildings, limited mixed-use High-Rise Buildings and Low-Rise Buildings;*



Figure 3: Schedule 1A of the Draft VOP: Strategic Growth Areas

In our opinion, the *Core Employment Area* category is not appropriate for the Site as it represents a transitional area between an established residential neighbourhood and the Vaughan Mills Shopping Centre. Lands within the *Core 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 Site due to its location between a *Primary Centre* to the east and an established residential neighbourhood to the west. As discussed above, the Site should be redesignated *Mid Rise Mixed Use* and *High Rise Mixed Use* to support an appropriate development pattern that will create an integrated and complete community.

As such, we request the *Primary Centre* Strategic Growth Area be extended to the Site. It should be noted that the Site and broader Development Block have remained largely vacant for several years despite historically being designated for employment uses.

Policy 2.2.2.4 of the Draft VOP states that *Primary Centres* shall be planned to:

a. *Develop with a mix of housing types and tenures, including housing suitable for seniors and families with children and Affordable Housing and Attainable Housing*
b. *include a mix of non-residential uses, including Retail, office, institutional, Community Facilities, and Human Services intended to serve both the local population and the City as a whole, and attract activity throughout the day;*
c. *develop at densities supportive of planned public transit;*
d. *have a fine grain multimodal 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;*
e. *include an appropriate amount of well-designed public open spaces appropriate to the local context, including City-owned parks;*

f. encourage a pedestrian-friendly built form by locating active uses at grade; and
g. be designed and developed to implement appropriate transition of intensity and use to surrounding Community Areas, and/or compatibility with adjacent Employment Areas

Furthermore, we note that the Site is not located in proximity to major Rail Facilities, which is described as an important feature of *Core Employment Areas* within the Draft VOP. According to Section 2.2.4,

> *Core Employment Areas also include the City's major Rail Facilities, identified on Schedule 1. Rail-related policies are included in Section 3.9. Close proximity to highway access and providing appropriate frontage for these facilities is important.*

It should be noted that we are coordinating with the adjacent landowners to prepare a concept that will demonstrate how mixed-use development can support residential and non-residential growth within the development block between Weston Road and Highway 400 as part of a complete community.

Natural Heritage Framework

According to Schedule 2 of the Draft VOP, an *Enhancement Area* is identified on the Site (Figure 4). According to Policy 3.6.3.16, *Enhancement Areas are undeveloped lands identified conceptually on Schedule 2 and are important components of the Natural Heritage Network because they have 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.



Figure 4: Draft Schedule 2 of the Draft VOP: Natural Heritage Network

Policy 3.6.3.17 states that,

> *Enhancement Areas shown on Schedule 2 are approximate and the final location and boundary of the Enhancement Area will be based on a natural heritage evaluation or Environmental Impact Study completed as part of the Development process.*

Furthermore, Policy 3.6.3.20 states that,

> *Enhancement Areas as determined by policy 3.6.3.17 above will be incorporated into the Natural Heritage Network as Core Features and/or open space designations and conveyed to the City as a condition of Development approval. Such changes do not require amendment to this Plan*.

We support the intent of these policies to allow for the refinement of *Enhancement Areas* based on the findings of an Environmental Impact Study (EIS) without an Official Plan Amendment. However, it should be noted that the *Enhancement Area* depicted on Schedule 2 of the Draft VOP does not accurately reflect the existing conditions on the Site. A portion of Black Creek currently traverses north-south along the westerly boundary of the Site. Schedule 2 should be revised to remove the *Enhancement Area* depicted as does not reflect the existing condition on the Site. It is noted that the VMSCP contemplates the realignment of Black Creek; however this will be addressed through a formal development application review process.

Road Classifications

According to Schedules 9A, 9B and 9C of the Draft VOP, a proposed road network is identified on the Site consisting of two north-south Minor Collector Streets and one east-west Local Street. In our opinion, including the proposed conceptual street network through the Site is inappropriate. Including a conceptual road network in the Draft VOP may create limitations for future development applications. With the exception of the extension of Bass Pro Mills Drive, the final configuration of the road network should be informed by the outcome of the pending OLT matter or through a development application. We request the road network on Schedules 9A, 9B and 9C of the Draft VOP be removed.

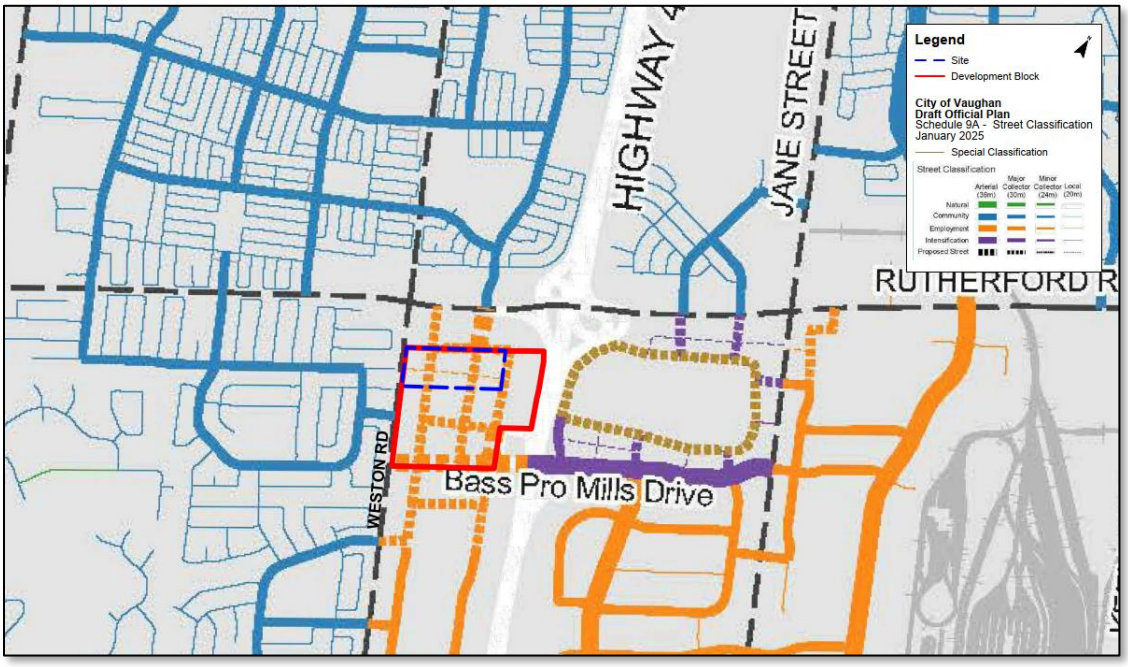


Figure 5: Draft Schedule 9A of the Draft VOP: Street Classification

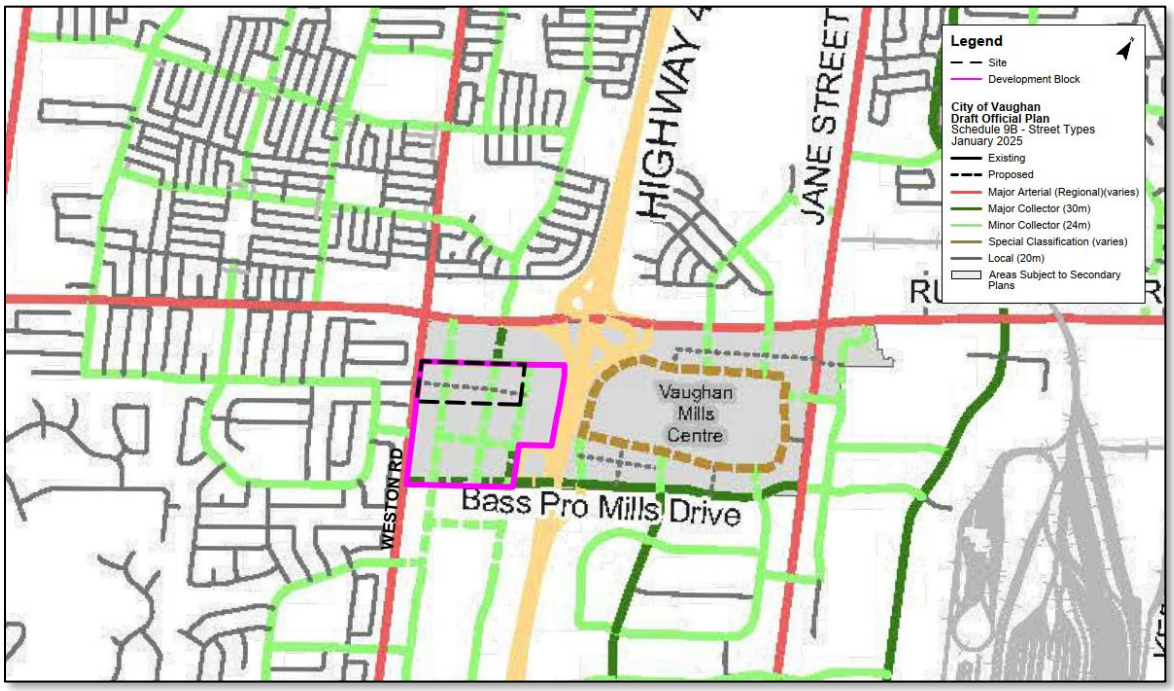


Figure 6: Draft Schedule 9B: Street Types

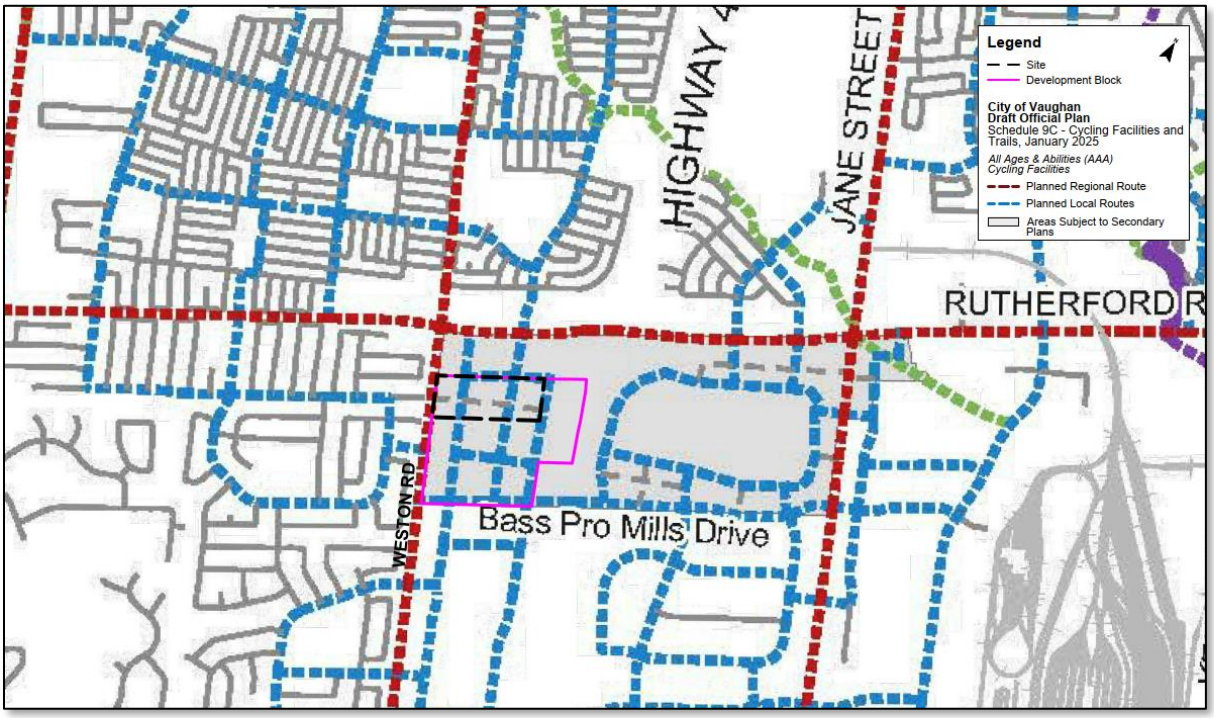


Figure 7: Draft Schedule 9C: Cycling Facilities and Trails

Transition

Section 1.4.2 of the Draft VOP provides transition policies that will repeal VOP 2010 subject to the criteria of Policy 1.4.2.1 to Policy 1.4.2.2. Applications in process will also be subject to transition policies established in the Draft VOP. We note that certain matters of VOP 2010 for the lands west of Highway 400, including the Site, have been appealed to the OLT and are yet to be disposed of fully.

Section 1.4.2.1 of the Draft VOP provides transition policies for the repeal of VOP 2010. According to Policy 1.4.2.1(b),

> *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 for the following secondary plan areas:*
>
> *i. The "Weston Road and Highway 7" area shown on Schedule 14A; and*
> *ii. The "Vaughan Metropolitan Centre" area shown on Schedule 14A.*

It is our understanding that the policies and schedules of the VMCSP will continue to apply to the Site; however, these policies and schedules, as they relate to the lands west of Highway 400, are under appeal to the OLT. Based on the analysis provided in this letter, it is our opinion that *Mid-Rise Mixed Use* and *High-Rise Mixed-Use* designations are appropriate for the Site and should be depicted on Schedule 13 (Land Use) of the Draft VOP. The extension of the *Primary Centre* Strategic Growth Area category to include the Site supports this objective.

Conclusion

In summary, we are pleased to provide the following requests:

- Revised Schedule 13 of the Draft VOP to designate the Site *Mid Rise Mixed Use* along Weston Road and *High Rise Mixed Use* for the balance of the Site.
- Revise Schedule 1 of the Draft VOP to remove the *Core Employment Area* and apply the *Strategic Growth Area* to the Site.
- Revise Schedule 1A to extend the *Primary Centre* category to the Site to permit a mix of uses in support of a complete community.
- Revise Schedules 9A, 9B and 9C to remove the conceptual road pattern.
- Revise Schedule 2 to remove the *Enhancement Areas* on the Site.

Weston Consulting will continue to monitor the Official Plan Review process and reserves the right to provide further comments on this matter. We request to be notified on any future updates as well as any discussion pertaining to the designations and policies pertaining to the Site, and to receive notice of any decisions by Committee and/or Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at ext. 241, Darrin Cohen at extension 329, or James Todd at extension 345.

Yours truly,
Weston Consulting
Per:

Ryan Guetter, BES, MCIP, RPP
President

Darrin Cohen, MCIP, RPP
Senior Planner

Encl. City of Vaughan Official Plan Review Commenting Letter, October 3, 2023

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

City Council
City of Vaughan
2141 Major Mackenzie Drive West
Vaughan, ON, L6A 1P7

October 3, 2023
File 3867

RE: City of Vaughan Official Plan Review
H&L Title Inc. and Ledbury Investments Ltd.
South of Rutherford Road and east of Weston Road

Weston Consulting is the planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (collectively, the "Owners"), the owners of the lands consisting of approximately 10.1 hectares located south of Rutherford Road and east of Weston Road, in the City of Vaughan (the "subject lands"). The subject lands are located in the southeastern quadrant of the Weston Road and Rutherford Road intersection in the City of Vaughan and are situated west of Highway 400. The purpose of this letter is to provide formal comments on the City of Vaughan's Official Plan Review and the draft materials that have been released for review and comment. As additional draft materials are released, we may provide further comments.

On November 4, 2022, the Ministry of Municipal Affairs and Housing modified and approved the new York Region Official Plan. The nature of the modifications included redesignating certain lands throughout the Region. As per the Minister's direction, the lands adjacent to the subject lands to the east and south were redesignated from an *Employment Area* designation to *Community Area*, as per Map 1A, Land Use Designations (see Figure 1 below). The subject lands were not redesignated by the Minister's decision and maintained an *Employment Area* designation.

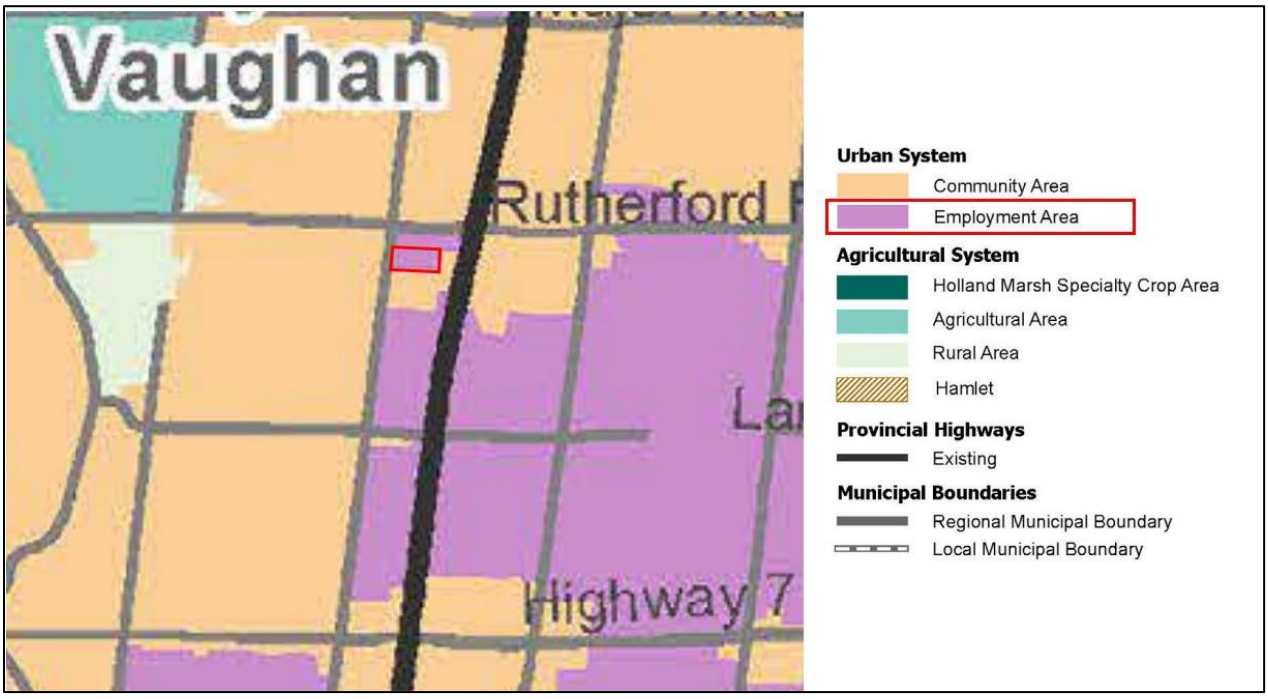


Figure 1: York Region Official Plan, Map 1A, Land Use Designations

Based on draft Schedule 1, Urban Structure of the City of Vaughan Official Plan, the land use designations of the subject lands are identified as *Employment Area,* whereas the adjacent lands are not consistent with the Minister's land use modifications to the York Region Official Plan on November 4, 2022. Notably, in the south east quadrant of Weston Road and Rutherford Road, the *Community Area* designation as per draft City of Vaughan Official Plan Schedule 1 is not consistent with the *Community Area* designation per York Region's Map 1A, Land Use Designations, with the City's draft Schedule 1 identifying lands immediately south of the subject lands as *Employment Area* whereas these lands are designated as *Community Area* in the York Region Official Plan (see Figure 2 below).

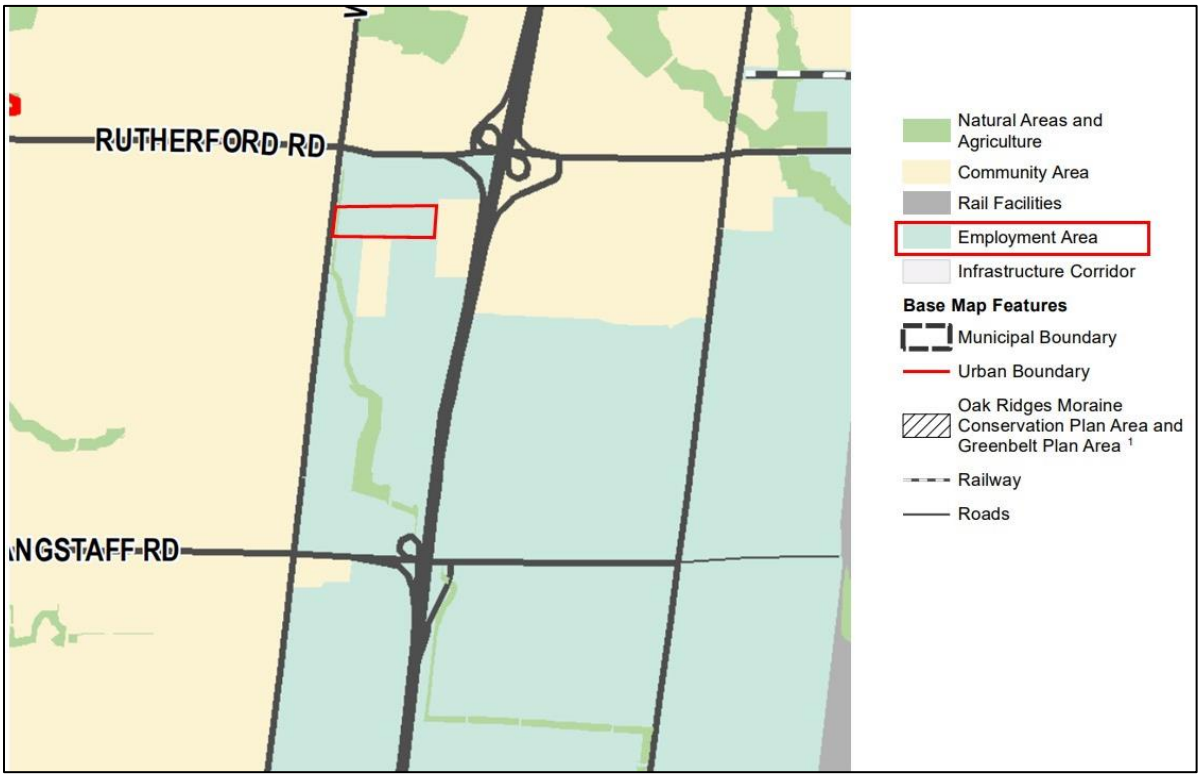


Figure 2: Draft City of Vaughan Official Plan, Schedule 1, Urban Structure

As a result of the inconsistency between the approved York Region Official Plan Map 1A and draft City of Vaughan Official Plan Schedule 1, the Owners request that the City revise the land use designation on Schedule 1, Urban Structure to ensure consistency with the Minster's decision on November 4, 2022. Further, we recommend that the City take steps to incorporate the subject lands as part of the *Community Area* in order to provide greater continuity of the land use designation and ultimately avoid orphaned *Employment Area* parcels in the City. The redesignation of the lands to *Community Area* would allow for greater continuity of lands with residential permissions situated to the south, east and west of the subject lands, and would be compatible with the lands to the north that are currently designated in the City of Vaughan Official Plan predominately for commercial uses (e.g. office, retail, hotel, etc.).

Thank you for the opportunity to provide comments on the City's draft Official Plan. We reserve the right to provide additional comments in the future. Please do not hesitate to contact the undersigned should you have any questions.

Yours truly,
Weston Consulting
Per:



Ryan Guetter, BES, MCIP, RPP
Executive Vice President

c. Mark Flowers, Davies Howe LLP
Stephen, Elliott & Gary Title

WESTON CONSULTING

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

December 1, 2025
File 3867

Attn: City of Vaughan Clerks Office

RE: Committee of the Whole Agenda Item 4.5 - Report of the Deputy City Manager
City-Initiated Official Plan Amendment – Changes to Employment Area Policies
9081 Weston Road

Weston Consulting is the authorized planning consultant for H&L Title Inc. and Ledbury Investments Ltd. (the "**Owner**"), with respect to the lands municipally known as 9081 Weston Road in the City of Vaughan (the "**Subject Property**" or "**Site**"). The Site forms part of a larger development block that includes lands to the immediate south of the Site (the "**Development Block**"). We have actively monitored and participated in the Official Plan Review process on behalf of the Owner and previously submitted correspondence on the Proposed VOP in letters dated March 14, 2025 (Attachment 1), June 3, 2025 (Attachment 2), and September 29, 2025 (Attachment 3) and provided oral submission at the Statutory Public Meeting on June 4, 2025 (collectively, the "**Previous Submissions**").

The purpose of this letter is to provide comments on the Draft City-Initiated Official Plan Amendment (the "**Draft OPA**") to both the Vaughan Official Plan 2010 (the "**VOP 2010**") and the York Region Official Plan 2022 (the "**YROP 2022**"). The amendments seek to align both plans with the new definition of "area of employment" in the *Planning Act* and the *Provincial Planning Statement*, while also addressing transitional policies until the Council-Adopted Vaughan Official Plan (the "**VOP 2025**") is approved by the Minister of Municipal Affairs and Housing.

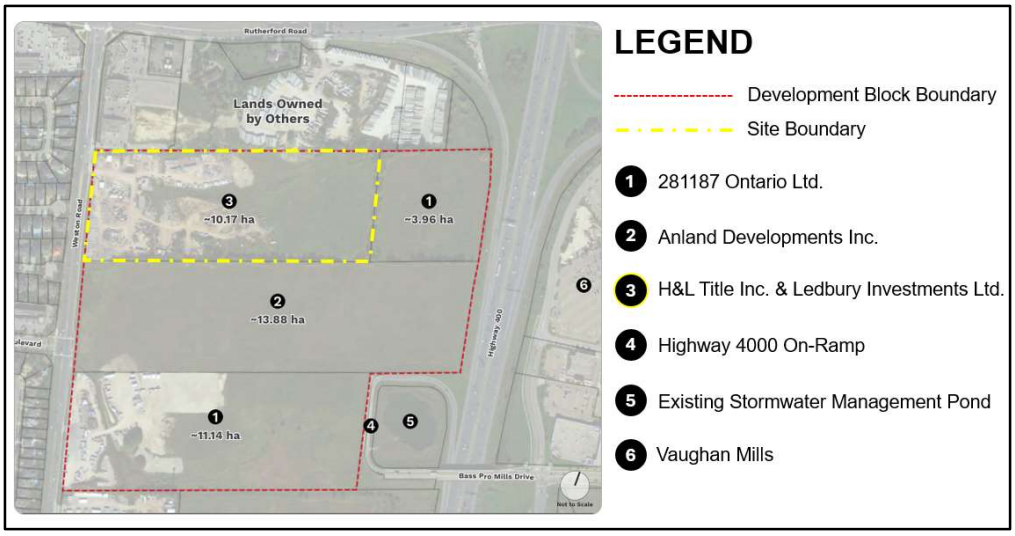


Figure 1: Subject Property and Development Block

As adopted by City Council, the Subject Property is within the *Employment Areas* overlay in the VOP 2010, which directs the Site's land use designation in the Vaughan Mills Centre Secondary Plan (the "**VMCSP**"), all of which remains subject to appeals at the Ontario Land Tribunal (OLT). Within the VMCSP, the Site is proposed to be designated *Prestige Office Employment and Prestige Employment*. The VOP 2025 proposes to retain both

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the Site's location within the *Employment Areas* overlay and the land use designation contained within the VMCSP.

Proposed City-Initiated Official Plan Amendment

A City-Initiated Draft OPA is being presented for feedback and comment at the Committee of the Whole Meeting on December 2nd, 2025. The purpose of the Draft OPA is to align VOP 2010 with changes to the *Planning Act* and policies in the Provincial Planning Statement 2024 regarding *Areas of Employment* that took effect on October 20, 2024, specifically related to permitted land uses. The amendments are required in the interim to address transitionary policies until VOP 2025 is approved by the Minister of Municipal Affairs and Housing. As the YROP 2022 also remains in-effect until VOP 2025 is approved, the Draft OPA will also update Regional employment policies.

The Draft OPA seek to implement the following changes:

YROP 2022

- Amending Policy 4.3.3 as follows:

  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, and associated office, retail and ancillary facilities.

- Adding Policy 4.3.16 as follows:

  Lands designated Employment Area within the City of Vaughan as shown on Map 1A are subject to Vaughan Official Plan policies authorizing the continuation of use(s) that are excluded from the definition of Employment Area, provided that the use(s) are lawfully established on the parcel of land before October 20, 2024.

- Amending the definition of "Employment Area" as follows:

  Employment Area: *Areas designated in this Plan for clusters of business and economic activities, including 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.*

VOP 2010

- Adding policies 2.2.4.3 and 2.2.4.4 as follows:

  2.2.4.3 That, as of October 20, 2024, pursuant to subsections 1(1.1) and 1(1.2) of the Planning Act, the City's Employment Areas include lands which support lawfully established uses that are not manufacturing, warehousing, or ancillary uses. Use(s) lawfully established on the parcel of land before October 20, 2024 shall be permitted to continue.

  2.2.4.4 In the event of a conflict in the interpretation of the policies of this Plan and Secondary Plans approved under VOP 2010 with respect to areas of employment, land use designations that constitutes the City's "employment area" in Policy 2.2.4.2 and all policies thereof, subsections 1(1.1) and 1(1.2) of the Planning Act and Provincial Planning Statement 2024 prevails.

- Adding Policy 9.2.2.10 (c) as follows:

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9.2.2.10 (c). uses which are not listed in policy 9.2.1.9 and 9.2.2.10.b. but were lawfully established before October 20, 2024 are permitted to continue

- Adding Policy 9.2.2.11 (d) as follows:

  9.2.2.11 (d). uses which are not listed in policy 9.2.1.9 and 9.2.2.11.c. but were lawfully established before October 20, 2024 are permitted to continue;

- Adding a new term "Employment Area" to Chapter 10 Implementation Section 10.2.2 Definitions

  Employment Area: *Areas designated in the Official Plan for clusters of business and economic activities, including 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.*

It is recognized that another City-initiated Draft OPA with respect to Volume 2 of the VOP 2010 is also being brought forward to account for the transitionary period until Volume 2 of VOP 2025 is updated. Although the Subject Property is located within the VMCSP, the Draft OPA is scoped to site and area specific policies that do not impact the Subject Property.

Comments on the Draft OPA

As outlined in our Previous Submissions, it continues to be our opinion that the *Employment Area* category for the Subject Property is not appropriate, and that opinion is reinforced by the amendments to the Planning Act and the Provincial Planning Statement 2024 regarding the definitions of "area of employment" / "employment area" and associated land use permissions. As of October 20, 2024, *Employment Areas* are intended to be reserved for industrial, manufacturing, warehouse and related uses, including research and development and ancillary retail and office uses. Limiting the permitted uses 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. Our Previous Submissions requested that Schedule 1B of VOP 2025 be revised to remove the Subject Property from the Employment Areas category and extend the *Primary Centre* Strategic Growth Area over the Site. It remains our opinion that the Site should be redesignated *Mid Rise Mixed Use* and *High Rise Mixed Use* to support an appropriate development pattern that will create an integrated and complete community.

Thank you for the opportunity to provide comments on the Draft OPA. We will continue to monitor this process and reserve the right to provide further comments regarding the matter. We request to be notified of any future updates, and to receive notice of any decisions by Council regarding this matter.

If you have any questions regarding the above comments, please contact the undersigned at extension 241 or Darrin Cohen at extension 329.

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
Vince Musacchio, Deputy City Manager, Planning and Infrastructure Development, City of Vaughan
Ryan Guetter, President, Weston Consulting

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STATUTORY PUBLIC MEETING

CITY OF VAUGHAN OFFICIAL PLAN REVIEW

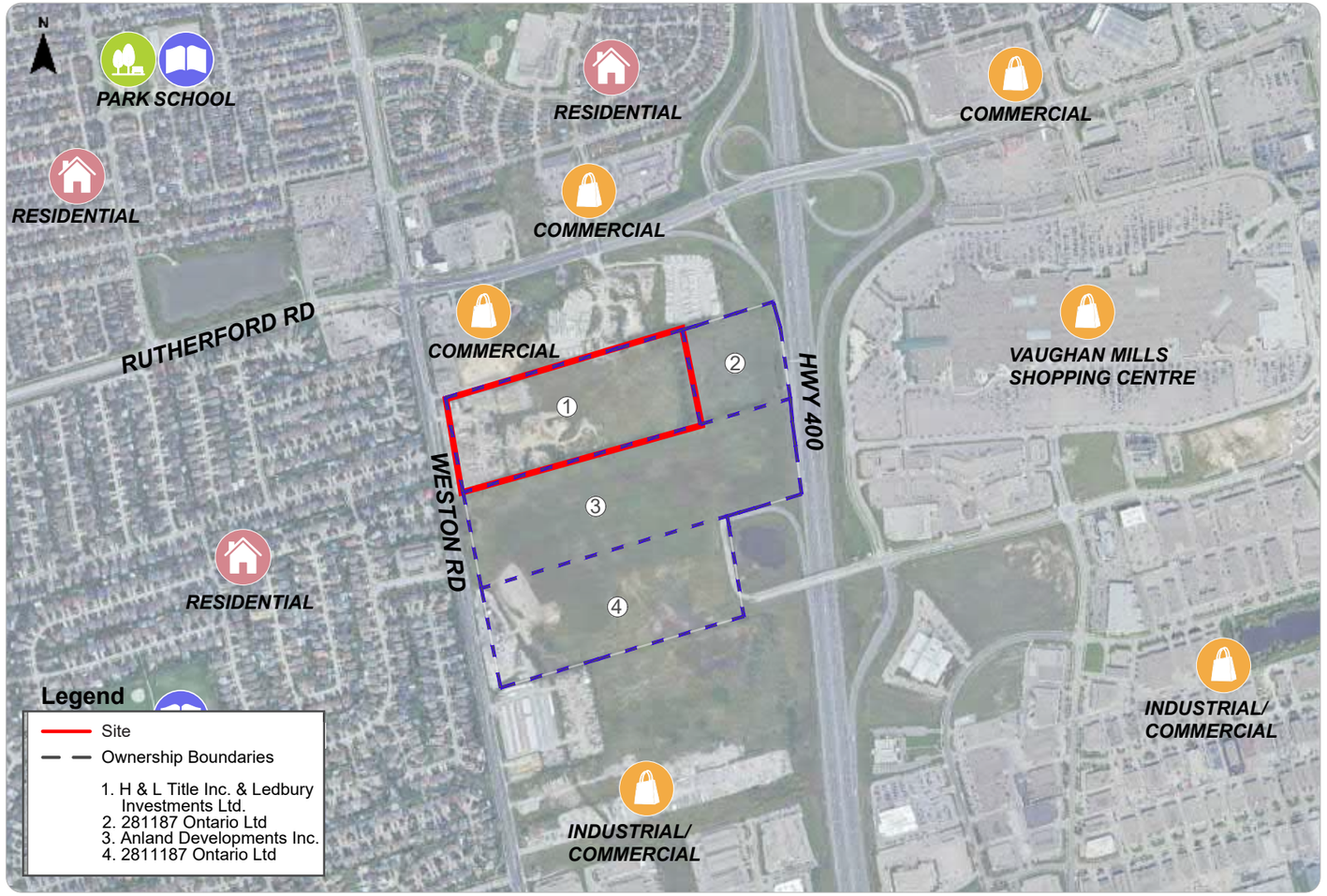
H&L TITLE INC. AND LEDBURY INVESTMENTS LTD.

9081 WESTON ROAD, CITY OF VAUGHAN

JUNE 04, 2025

WESTON CONSULTING

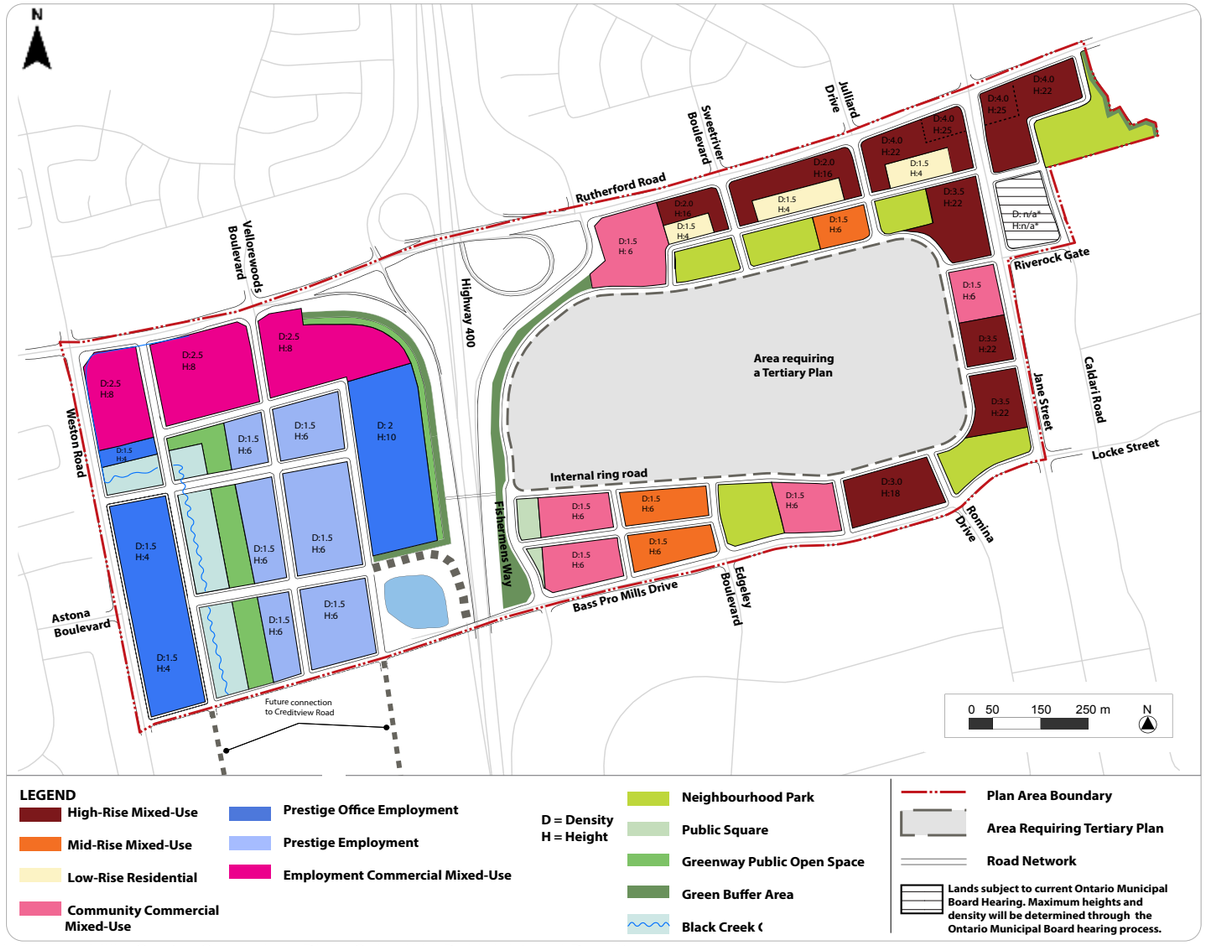
CONTEXT AND SUBJECT LANDS



Aerial Context Map (Source: Google Earth) - Prepared by Weston Consulting

- Located in the Vaughan Mills Centre Secondary Plan Area.
- Approximately 10 hectares in area.
- Approximately 200 metres of frontage along Weston Road.
- Part of a larger development block being coordinated with adjacent landowners as part of a master planned development.

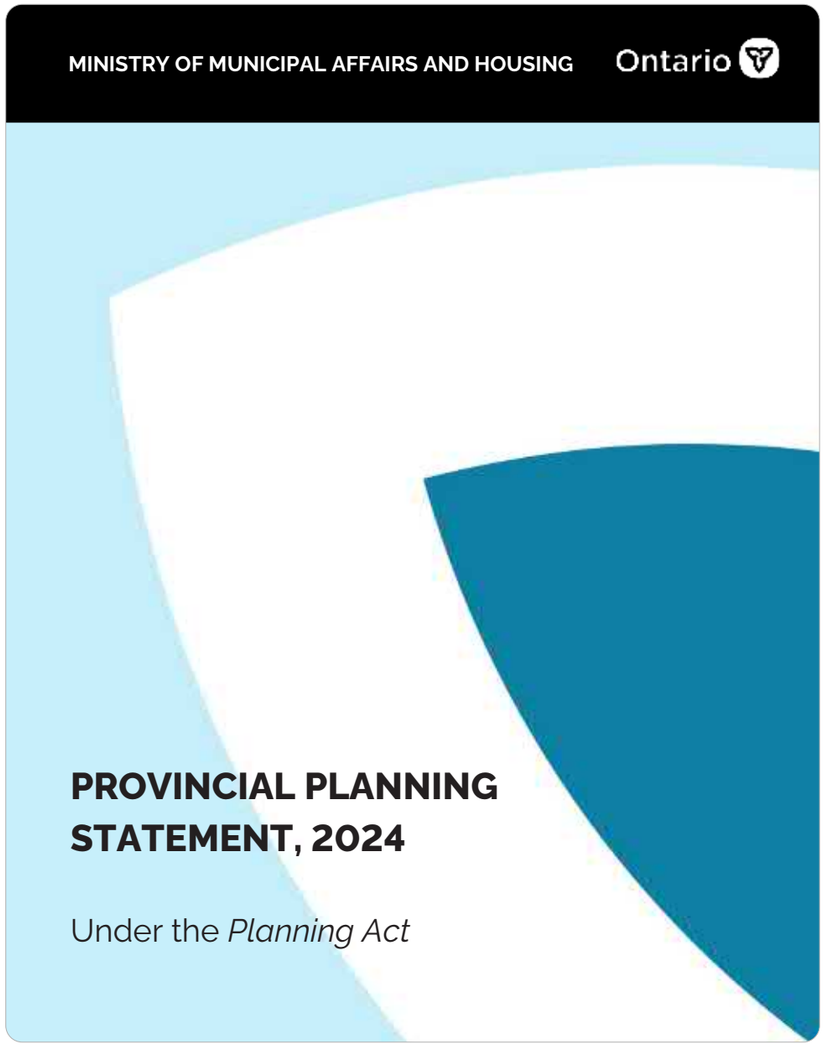
BACKGROUND AND HISTORY



Vaughan Mills Centre Secondary Plan, Schedule B: Height and Density

- 2009 report “Where & How to Grow” identified the site as a Priority Opportunity Area for residential intensification and as a key location to accommodate a greater mix of uses.
- VOP 2010 adopted with Employment Designation for the site and was subsequently appealed.
- 2014 Vaughan Mills Centre Secondary Plan Area adopted and was subsequently appealed.
- 2021 OLT decision (Phase 1) determined employment projections were unreasonable. The Phase 2 hearing is pending.
- Lands have remained largely vacant.

CHANGING LAND USE PLANNING FRAMEWORK



- New Provincial Planning Statement 2024
- Change to “areas of employment” in the Planning Act.
- Changes in nature of employment.
- Housing affordability and housing supply.

DRAFT OFFICIAL PLAN

SCHEDULE 1 - URBAN STRUCTURE

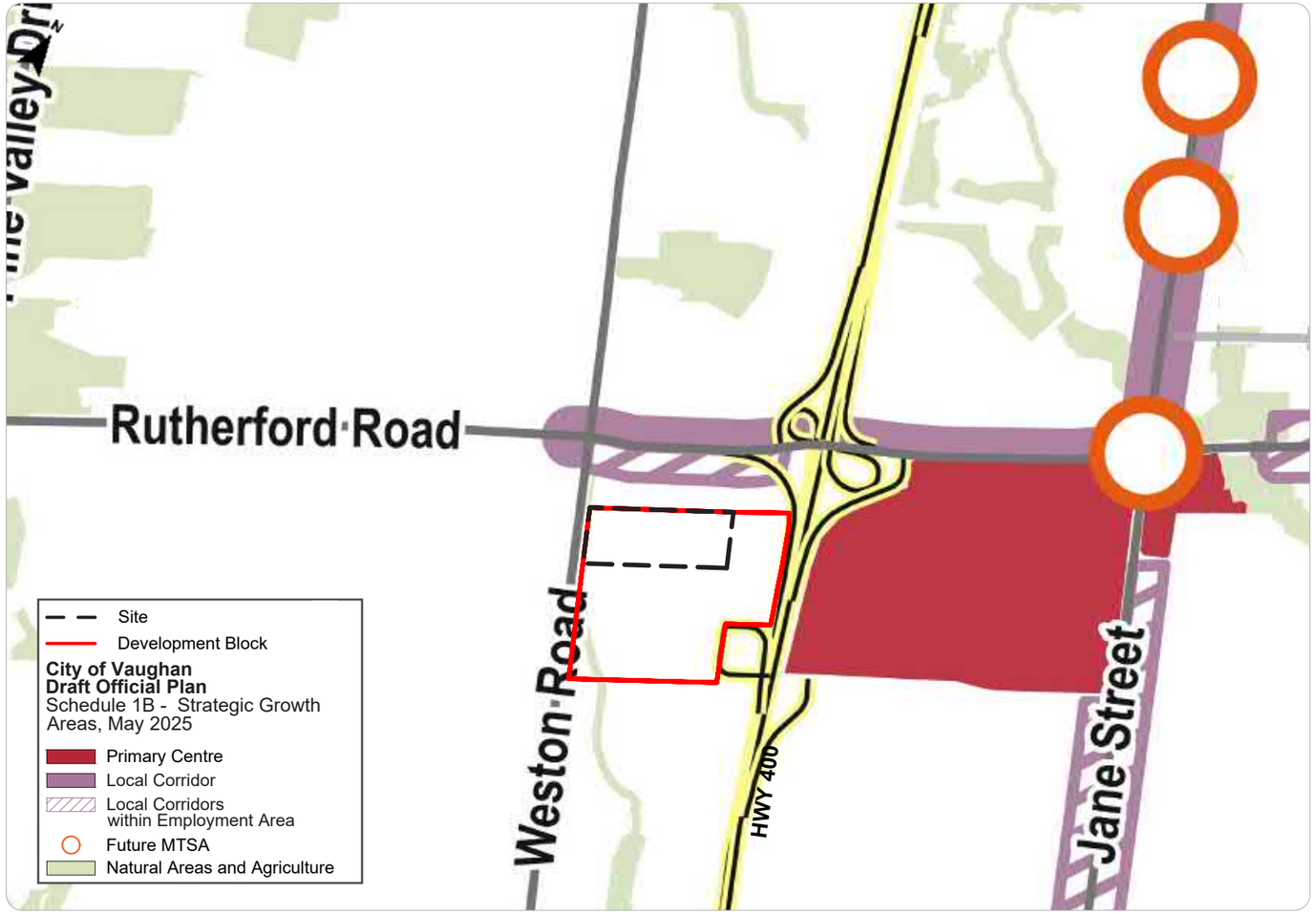


Draft VOP, Schedule 1: Urban Structure, May 2025 - Prepared by Weston Consulting

- Located in the *Employment Area*, according to Schedule 1 of the Draft VOP.
- VMCSP includes the lands west and east of Highway 400.
- ***Request: Revise Schedule 1 to include the site and development block within the Strategic Growth Area.***

DRAFT OFFICIAL PLAN

SCHEDULE 1B - STRATEGIC GROWTH AREA



Draft VOP, Schedule 1B: Strategic Growth Area, May 2025 - Prepared by Weston Consulting

- Adjacent to a *Primary Centre*, which includes the Vaughan Mills Shopping Centre, according to Schedule 1B of the Draft VOP.
- Represents a transition area between an established residential neighbourhood and the Vaughan Mills Shopping Centre.
- ***Request: Revise Schedule 1B to extend the Primary Centre to include the site and development block.***

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SCHEDULE 2 - NATURAL HERITAGE FRAMEWORK

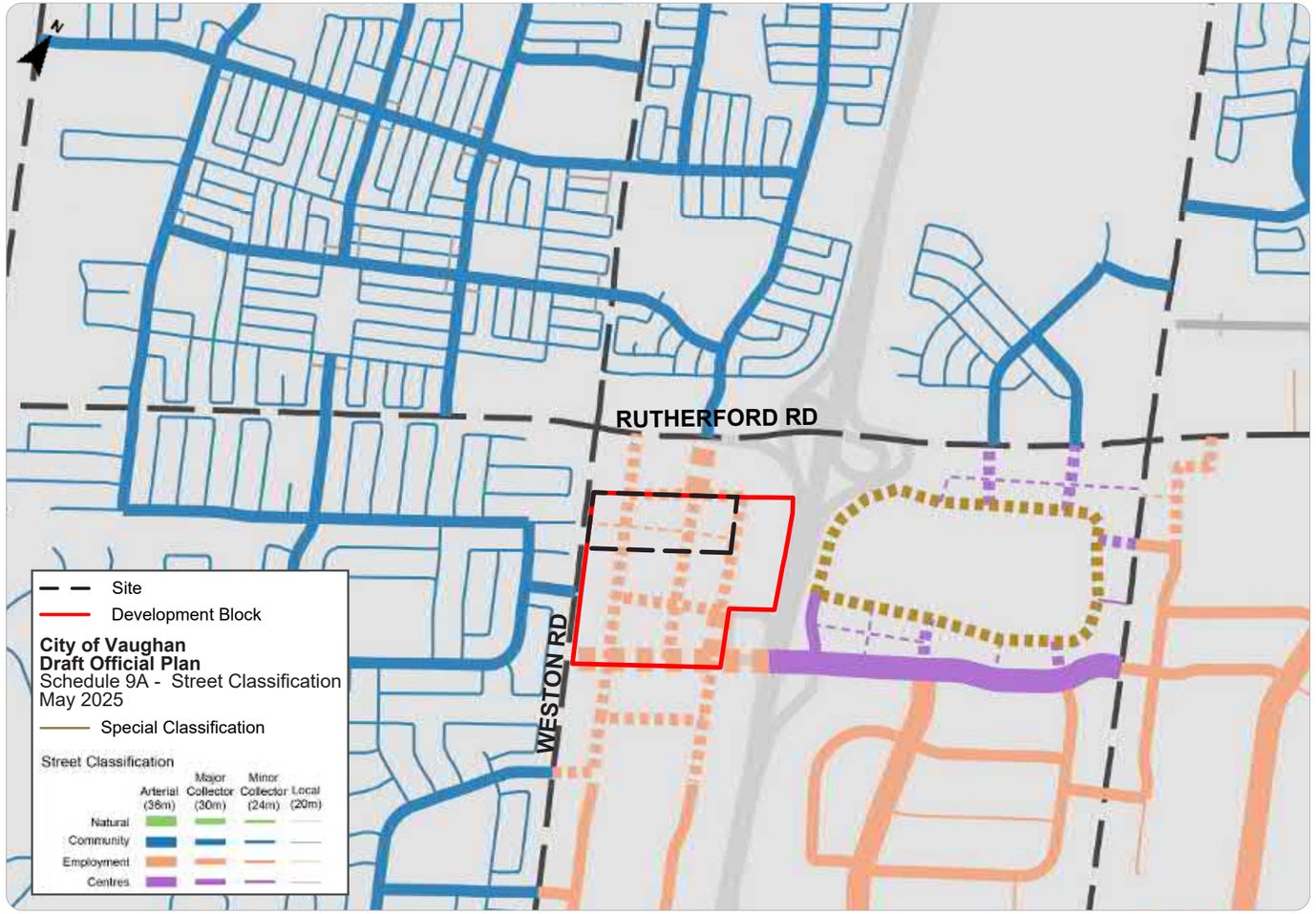


Draft VOP, Schedule 2: Natural Heritage Framework, May 2025 - Prepared by Weston Consulting

- The lands include an area *To Be Determined Through Future Studies.*
- Does not accurately reflect the existing or proposed conditions.
- ***Request: Revise Schedule 2 to remove the depiction of the area To Be Determined Through Future Studies.***

DRAFT OFFICIAL PLAN

SCHEDULE 9A - STREET CLASSIFICATION



Draft VOP, Schedule 9A: Street Classification, May 2025 - Prepared by Weston Consulting

- Schedules 9A, 9B, and 9C of the Draft VOP show a conceptual road network on the site.
- Roads will be determined through the Secondary Plan and future development applications.
- ***Request: Revise the Schedules to remove the conceptual road pattern, key north/south and east/west connections will be maintained.***

DRAFT OFFICIAL PLAN

SCHEDULE 13 - LAND USE DESIGNATIONS



Draft VOP, Schedule 13: Land Use Designations, May 2025 - Prepared by Weston Consulting

- Employment designation in the VMCSP.
- Transition between residential neighbourhood and Vaughan Mills Shopping Centre
- ***Request: Designate the site Mid-Rise Mixed Use and High-Rise Mixed Use.***

PUBLIC BENEFITS

- ✓ **Supports the development of a Complete Community, including parks, community uses and amenities.**
- ✓ **Enables the delivery of a variety of housing types.**
- ✓ **Provides affordable housing opportunities, community uses and new jobs.**
- ✓ **Delivers employment opportunities, including commercial.**
- ✓ **Provides important N/S and E/W road connections.**
- ✓ **Leverages the extension of Bass Pro Mills Drive.**
- ✓ **Improves the Black Creek channelization for SWM, flood control and naturalized amenity.**

Thank You
Comments & Questions?

Ryan Guetter, BES, MCIP, RPP
Weston Consulting

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