

February 28, 2019

Submitted by Email: [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

Charles O'Hara  
Ontario Growth Secretariat, Ministry of Municipal Affairs  
777 Bay Street  
c/o Business Management Division, 17th floor  
Toronto ON M5G 2E5

Dear Mr. O'Hara,

**Re: Amendment 1 to the 2017 Growth Plan for the Greater Golden Horseshoe ("Amendment 1")  
Proposed framework for Provincially Significant Employment Zones  
ERO number – 013-4506  
Notice type: Policy Proposal**

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We are planning consultants for The Wemat Group, the owner of the lands located on the south side of Highway 7, between Leslie Street and Highway 404 in the City of Markham, as shown on Attachment 1 (the "subject lands"). The purpose of this letter is to provide comments with respect to the proposed Amendment 1 to the 2017 Growth Plan for the Greater Golden Horseshoe (the "Growth Plan") and the proposed identification of Provincially Significant Employment Zones ("PSEZ") as it relates to the subject lands.

*Subject Lands*

The subject lands comprise two separate parcels bisected by Commerce Valley Drive East. To the east of Commerce Valley Drive, the lands are largely vacant, with the exception of a storm water management pond in the southwest corner of the parcel. The western parcel contains single-storey commercial uses, as well as a 7-storey office building fronting onto Highway 7. The portion of the lands fronting onto Leslie Street, south of Highway 7, are vacant. As shown on Attachment 1, the 6-storey hotel located at the southwest corner of Highway 7 and Commerce Valley Drive (300 Commerce Valley Drive) is not part of the subject lands.

### *Immediate Context*

The subject lands are surrounded by a variety of office, hotel, service and retail commercial uses in predominantly low-, with some mid-rise, building forms. The area immediately north of the subject lands, within the northeast quadrant of Highway 7 and Leslie Street, contains a mix of hotel, office, restaurants, as well as service, entertainment and health facilities. Further west along Highway 7, the corridor has a mix of office, retail, commercial and higher-density residential uses. Low-density residential neighbourhoods are found in the areas further north and south of Highway 7. The area immediately south of subject the site contains a mix of low-rise commercial facilities, as well as hotel and office buildings. The lands west of Leslie Street are primarily occupied by office buildings (5-9 storeys) and above-grade parking structures.

The subject lands are well served by public transit. In particular, the Highway 7 East VivaNext rapid transit line operates within its own dedicated right-of-way right in front of the subject lands. The line generally extends east-west between the new Vaughan Metropolitan Centre and the Unionville GO Station. There are two stops immediately adjacent to the subject lands; one at the intersection of Highway 7 and Leslie Street and other at Highway 7 and Commerce Valley Drive East. Accordingly, the subject lands are located within a “Major Transit Station Area” (“MTSA”), as defined by the Growth Plan. Furthermore, the subject site is located within the boundaries of an intensification area (“Commerce Valley/Leitchcroft”), and is in proximity to the Gateway Hub identified at the intersection of Highway 7 and Leslie Street in the City’s Official Plan (“OP”).

### *Designation of Subject Lands within a Provincially Significant Employment Zone*

It is our respectful submission that the subject lands should be excluded from the PSEZ (see Attachment 2). The subject lands should be planned for a mix of compatible employment and non-employment uses, for the following reasons:

- The Growth Plan promotes the optimization of infrastructure, particularly along transit and transportation corridors, along with the provision of a mix of land uses and housing options to achieve complete communities. In accordance with the Growth Plan, the subject lands would be considered a “strategic growth area” (*i.e.* a focus for accommodating intensification and higher-density mixed uses in a more compact built form), given that the lands are located within an MTSA.

- The City has not completed a study of its MTSA's, and it is our opinion that the broadest range of compatible lands uses (including non-employment uses) should be evaluated to optimize the use of this new transit infrastructure. It would be premature to identify the subject lands within a PSEZ until a full evaluation of the MTSA has been completed.
- The subject lands do not contain existing employment uses that would be threatened by the introduction of sensitive land uses. It is important to note that the "Business Park Office Priority Employment" land use designation applying to the subject lands (in the Markham OP), does not permit manufacturing, processing or warehousing uses, but does permit sensitive land uses such as daycare centres.
- Mixed-use development on the subject lands would not displace existing industrial, commercial or office uses. The locational character and existing uses are not reflective of typical employment areas, which are generally comprised of manufacturing and production facilities, in low-rise, space expansive buildings. Instead, the subject lands present a significant opportunity to be developed for a mix of uses that can maintain a significant number of jobs and at the same time, realize the additional components of a complete community.
- The current use of the subject lands represents an underutilization of land adjacent to higher order transit infrastructure. Over 75% of the lands are currently vacant, and on those lands that are occupied, current density is below 0.4 times the lot area. In our opinion, there is significant opportunity to increase both employment and residential population in a mixed-use community.



We thank you for your consideration of our comments. If you have any questions, or would like to meet to discuss our client's concerns, please contact the undersigned.

Yours truly,

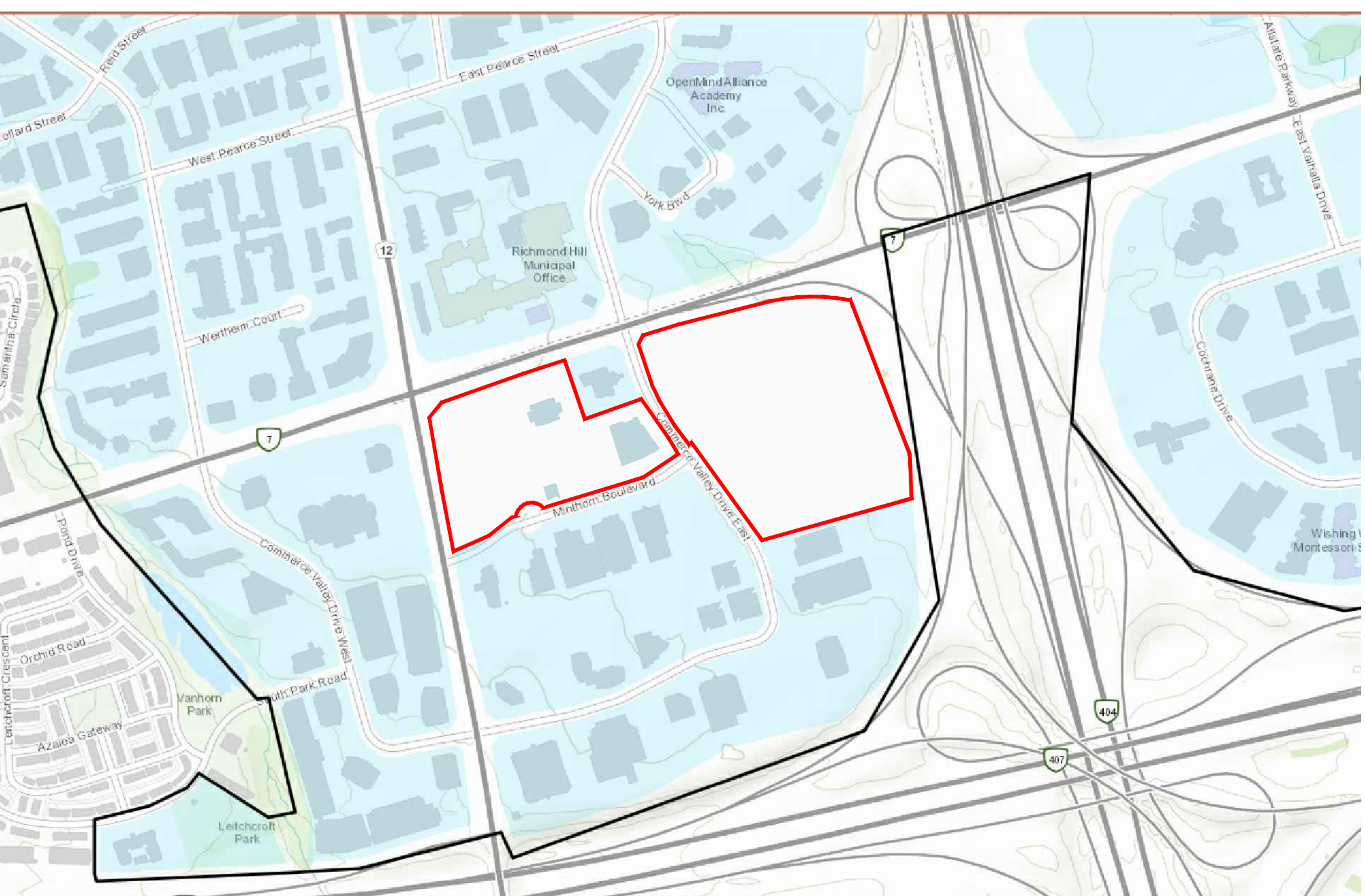
**Bousfields Inc.**

A handwritten signature in black ink, appearing to read "L. Tinker".


Louis Tinker, MCIP, RPP


Cc Michael Melling and Samantha Lampert, Davies Howe LLP  
Maurice Wager, President, CollecDev





**ATTACHMENT 2**

 Area to Be Removed from Provincially Significant Employment Zone

 Provincially Significant Employment Zone