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November 24, 2021

*Our file: NE.MA*

**VIA EMAIL**

York Regional Council  
17250 Yonge St  
Newmarket, ON L3Y 6Z1

Dear Members of York Regional Council,

**Re: Updated Draft Regional Official Plan (Item F.2)**

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We represent a group of landowners within the City of Markham known as the Upper Markham Village Landowners Group Inc. (the “Landowners’ Group”). Collectively, the Landowners’ Group owns lands in North Markham, generally bounded by Major Mackenzie Drive, McCowan Road, Elgin Mills Road, and Highway 48, as well as lands located on the east side of Highway 48, between Major Mackenzie Drive and the Greenbelt.

On behalf of the Landowners’ Group, we have reviewed the Updated Draft Regional Official Plan (Draft ROP), dated November 25, 2021. We want to start off by commending the Region on the Draft ROP and all of the work that has gone into its preparation. Overall, the Draft ROP is well written, easily understood and interpreted, and we support the majority of the policies within the document.

We continue to review the Draft ROP and may provide additional comments for the Region’s consideration. However, we wish to take this initial opportunity to provide some preliminary comments with respect to the phasing policies within Section 4.0 of the Draft ROP.

**Preliminary Comments on Phasing Policies**

We recognize the importance of comprehensively planning for the development of new community areas to ensure appropriate development with respect to infrastructure services and roads. We also agree that the development of new community areas should generally be phased, beginning with the concession blocks that are adjacent to the existing urban area and in tandem with the provision of infrastructure and community facilities. However, we are concerned that some of the phasing policies in Section 4.2.2 may place unnecessary and unintended restrictions on the timing of development within the new community areas.

Policy 4.2.2.2 requires local municipal official plans to identify phasing of development within new community areas, to the satisfaction of the Region, in accordance with, among other matters, “d) a maximum number of concession blocks being permitted to development at any one time”. We are concerned that the requirement for local municipalities to implement a policy to limit development to a maximum number of concession blocks will unnecessarily restrict development that may otherwise be able to proceed in accordance with the intent of the other phasing policies to ensure the logical and orderly development of new community areas. As well, restricting land supply at this time, with a serious affordability crisis, is not in our opinion prudent planning. **In our opinion, policy 4.2.2.2 d) should be deleted,**

Policy 4.2.2.4 sets out requirements that the approval of secondary plans for new community areas shall be contingent on several matters, including, among other matters:

- “b) the Region achieving a minimum average of 50% intensification over the last 5 years”;
- “c) the Region achieving a minimum population of 1.5 million people”; and
- h) A requirement that any phase of development shall only be approved once the preceding phase “is 75% registered”, among other matters.

Similar to our previous comment, we are concerned that these above noted requirements of policy 4.2.2.4 may limit the ability of development to occur, or impede the progression of development within the new community areas if any of the noted metrics are not being met. The Region’s Land Needs Assessment has identified a need to expand the urban boundaries in the Region, based on population and employment forecasts as well as minimum intensification and density targets, in conformity to the Growth Plan. This expansion ensures that over the planning horizon of the Plan, the minimum targets will be met.

With respect to sub-policy b), we heard from Region staff that the intensification target fluctuates considerably year to year. To require meeting an average could mean that family housing, which is desperately needed to address the affordable housing crises, will be delayed.

With respect to c), the Region is not forecast to achieve a population of 1.5 million until 2031, which means the approval of the secondary plan cannot happen until at least 2031. However, it takes a considerable long time to proceed through Secondary Planning studies, MESP, draft plans of subdivision, rezoning and installing infrastructure. This process can generally takes in excess of 10 years. For development to happen in 2031, secondary planning studies must begin now.

Restricting development based on these metrics is not appropriate, nor is it practical for local municipalities to base the approval of local secondary plans on metrics that apply on a Regional basis. **In our opinion, policies 4.2.2.4 b) and c) should be deleted.**

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As noted above, policy 4.2.2.4 h) requires that the previous phase of development be 75% registered. In our opinion, this policy will also further restrict land supply when it is desperately needed to address the affordability crisis. As well, without a phasing plan, it is very difficult to understand how such a policy will be implemented. If the phases are small, a small group of landowners can restrict development and land supply further pushing up housing prices. In our opinion, phasing policies should focus solely on infrastructure provision – ensuring development is delivered in tandem with infrastructure and community facilities and not create policies that will restrict land supply. **In our opinion, policy 4.2.2.4 h) i. should be deleted.**

### **Conclusion**

We understand that the Region will continue to receive comments on the Updated Draft Regional Official Plan through the early part of 2022. We will continue to review the Plan in greater detail, and provide any further comments that we have, but we encourage staff to reconsider the phasing policies and focus on phasing development in tandem with infrastructure and community facility provision.

Thank you for the opportunity to provide comments.

Sincerely,

**SGL PLANNING & DESIGN INC.**



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**Paul Lowes**, MES, RPP, MCIP  
Principal

c.c. Paul Freeman, Chief Planner, York Region  
Upper Markham Village Landowners Group Inc.