



Gatzios Planning + Development Consultants Inc.

File No: 65MA-2103

April 6, 2022

The Regional Municipality of York

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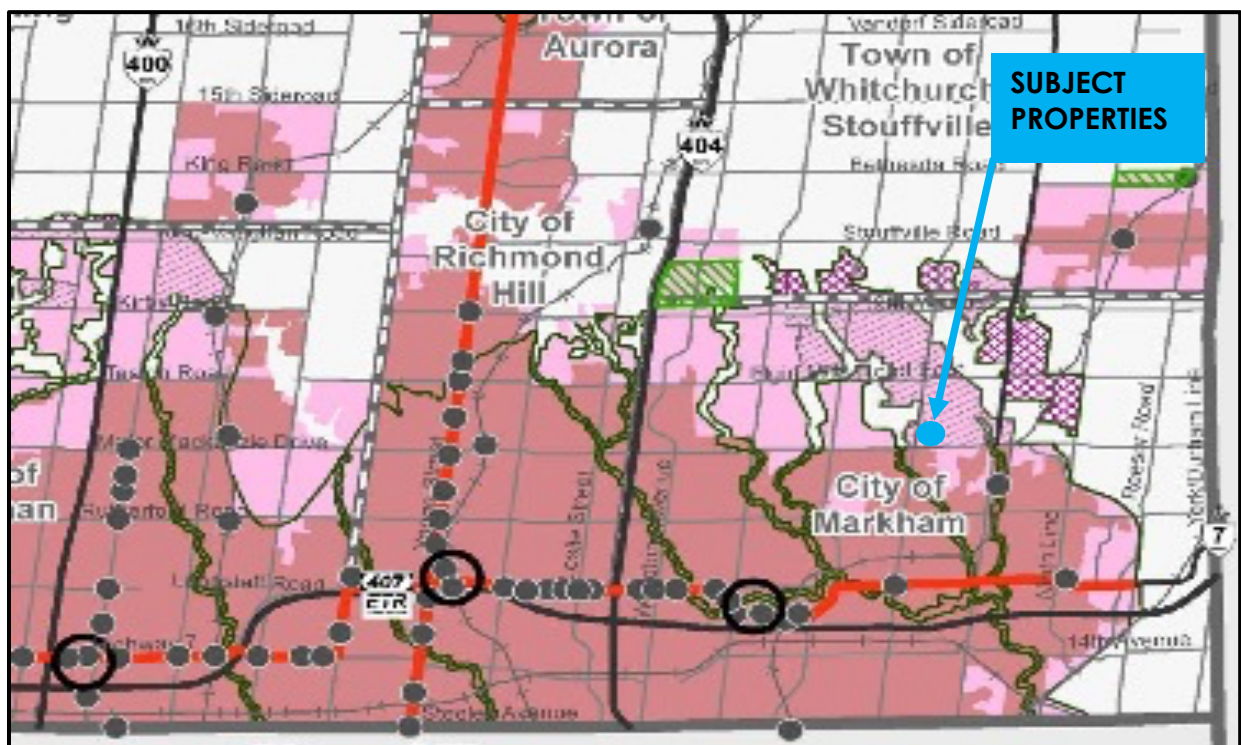
Attention: Mr. Paul Freeman, Chief Planner

Regarding: 2021 DRAFT YORK REGION OFFICIAL PLAN COMMENTS
Markham MMM North Development Corp.
Markham MMM South Development Corp.
Markham 5480 Major Mackenzie Development Corp.

Dear Mr. Freeman:

We wish to provide our comments to the 2021 Draft York Region Official Plan on behalf of our above-clients regarding their properties situated generally on the northeast corner of McCowan Road and Major Mackenzie Drive within the City of Markham.

The properties are located within the Future Urban Area (New Community Area) as illustrated below comprising approximately 100 acres:



We wish to compliment regional staff on producing a forward-thinking and strategic draft new Official Plan which will guide the Region in the coming years.

Our comments for suggested revisions to the 2021 Draft York Region Official Plan are as follows.

Proposed policies in section 2.3.2 address housing and include policies regarding affordable housing.

The goal of affordable housing for everyone is common to all of us – within and beyond the land development and building industry. It is our opinion that this goal can not be met by focussing only on the price of a new residential unit as set by building industry for its introductory sale into the market.

Considerations such as the price of the unit's subsequent sale once the first purchaser sells the unit, household income rates, measurements and fluctuations, and a host of other matters come into play when considering policies such as those in this section of the draft new Plan. Coupled with the increased costs of development and the complexities of built form, urban design and other development considerations, we believe that the matter of housing affordability requires a broad and all-encompassing approach.

We urge the Region to ensure it focusses on all aspects of potential solutions to the goal of affordable housing and not only on housing purchase price considerations.

Proposed policy 2.3.2.6 includes the requirement for local municipalities to consider including additional dwelling unit policies in their official plans.

Many of our builder clients are supportive of the opportunity for additional dwelling units in their developments. However, significant impediments exist and require all levels of government to cooperate to ensure that implementation of additional dwelling unit permissions is possible and practical. Matters such as additional parkland dedication, additional development charges, additional parking, additional zoning restrictions, etc are all critical and must be comprehensively addressed by the region and the local municipalities if these policies are to succeed in delivering additional units.

Proposed policy 4.2.2.1 requires that local municipalities shall plan comprehensively for the entire new community areas.

The *new community area* in Markham is large and spans several concession blocks. This requirement must be carefully implemented so that it is kept at a high and broad level to ensure that the City is not burdened with a very large, diverse, lengthy and difficult to complete study required to cover such a large geographic area.

Proposed policy 4.2.2.2 addresses phasing in new community areas. Clause d. addresses a maximum number of concession blocks being permitted to develop at any one time.

Given that the new community area in Markham covers several concession blocks, one must be cautious to not allow this policy to preclude development in any or all concession blocks if development is stalled for some reason in another concession block. Logical and progressive phasing does not have to restrict development in one concession block in order to complete development in another. Rather, the logical extension of infrastructure and the planned development of a concession block should be the goal. Interdependence with the timing of a different concession block is not required and in fact could be detrimental to the delivery of housing in the entire area.

Proposed policy 4.2.2.4 provides conditions for approval of secondary plans for new community areas.

We urge the Region to not create conditions upon approval of secondary plans, but rather create conditions or criteria upon the occurrence of development itself. The secondary plan approval process is already a long and difficult one, and the approval of a secondary plan does not in and of itself permit development – it is the subsequent planning approvals of zoning or draft plan of subdivision or site plan which actually permit development to occur. Approval of a secondary plan should not await the items listed in this proposed policy, but rather it should provide the framework for development to take place with the appropriate criteria to be met in subsequent development approvals.

We suggest that this policy be revised to provide criteria which may be applied to the approval of development, not to the approval of secondary plans.

Further, several of the criteria are not appropriate conditions for development in *new community areas*, in our opinion.

Criteria **b.** in **4.2.2.4** would restrict development in one area of the City of Markham and for one new community IF development in another area of the City in a different community did not occur for whatever reason. This linkage is not appropriate as it would stop development in one area if another area is subject to any sort of delay. Delays in development caused by matters such as servicing, soils issues, construction, groundwater, market conditions etc can and do cause delays to development. A policy such as this could have a very significant negative impact on the supply of housing in the entire City of Markham if one area suffers a delay it would cause a delay across many areas and communities and housing forms. We urge the removal of this criteria. As we see no benefit to creating a level to stop development across many areas for unrelated issues.

Criteria **c.** in policy **4.2.2.4** would also restrict development on certain communities and housing forms in an artificial manner and should be removed.

Criteria **h.i.** in policy **4.2.2.4** should be reconsidered for the same reasons noted above – delays or difficulties in developing one particular area should not cause a delay in development of other communities. Policies such as these serve to further exacerbate housing shortages and constrain the market such that demand exceeds supply causing delays in housing delivery and potential increases in housing prices.

Proposed policy 7.3.15 addresses a plan of subdivision which has been registered for eight years or more, and proposes that the Region or a local Council shall deem it not to be a registered plan of subdivision if it does not meet this Plan.

Once a plan of subdivision is registered and developed and housing is built it would be extremely odd and unfair to the lot owners / residents for this to occur, and it is unclear why this policy has been included in this draft of the Plan. Many plans of subdivision which have been registered (and built) more than 8 years ago may not meet the policies of this pending new Plan, however, to suggest that the Region is going to identify whole existing communities full of developed lots or even existing residents and deem their subdivision lots to not be a registered plan of subdivision is not logical. Perhaps this proposed policy was not worded as intended and therefore its language should be revisited.

We look forward to reviewing a further version of the new Plan and working with the Region to see it finalized and approved.

Sincerely,

Gatzios Planning + Development Consultants Inc.



Maria Gatzios, MCIP RPP

Copy to: Markham MMM North Development Corp., Markham MMM South Development Corp. and Markham 5480 Major Mackenzie Development Corp. care of: Mr. Eddie Lee, State Building Group