

October 8, 2019

MGP File: 16-2497

Region of York
17250 Yonge Street
Newmarket, ON L3Y 4W5

via email: sandra.malcic@york.ca

Attention: Ms. Sandra Malcic
Director, Long Range Planning

Dear Ms. Malcic:

RE: Request for a New Employment Area Designation
3450 Eglin Mills Road & 10900 Warden Avenue, City of Markham

Malone Given Parsons Ltd. ("MGP") are planning consultants for First Elgin Mills Developments Inc. ("First Elgin"), who we understand has a beneficial interest and management responsibility for the property municipally known as 3450 Eglin Mills Road and for Wu's Landmark Group Inc. ("Wu's Landmark"), the owner of the property municipally known as 10900 Warden Avenue, both of which are located within the City of Markham ("Subject Lands").

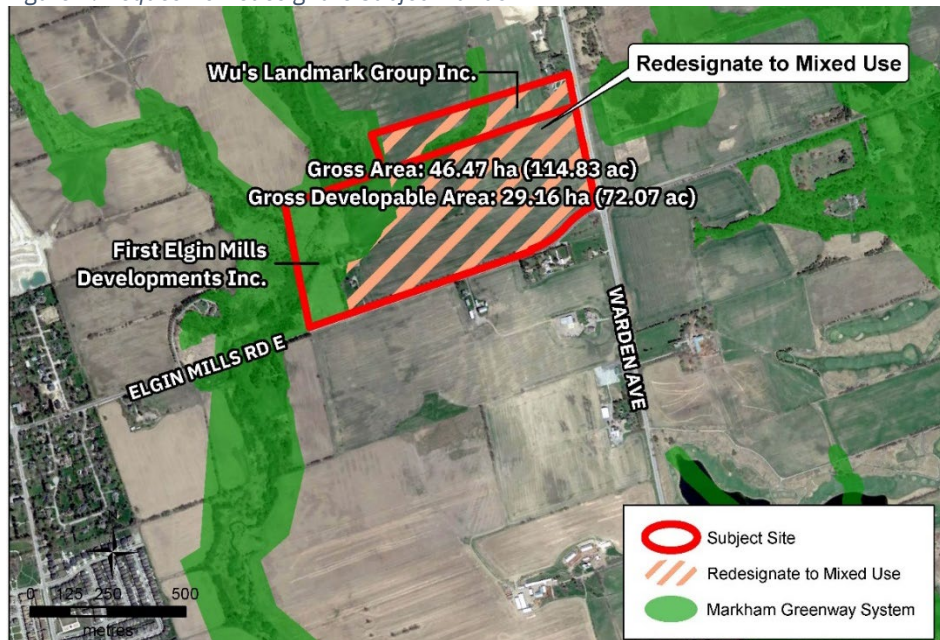
On May 1, 2019, we submitted a request to the Region for an "employment land" conversion for consideration during the Municipal Comprehensive Review ("MCR") process. Wu's Landmark and First Elgin are seeking a new employment area designation that permits a mix of uses for the Subject Lands, as shown in Figure 1 below.

Following our submission, we met with you, Regional staff and City of Markham staff to discuss the proposed conversion, specifically the initial assessment that the Region would not support the request. Since then we met with City staff on August 13, 2019 to discuss the proposal. In our meeting with City staff, we discussed that arterial roads, like Elgin Mills and Warden Avenue, are better suited for a more mixed-use type of use that would benefit from the good access, high visibility and market exposure that would support the employment area and it was important to align with the City's vision for the area. As such a decision regarding the appropriate uses on the Subject Lands should be deferred until the City completes its Future Urban Area Secondary Plan ("FUA SP") process, which is what City staff recommended on September 23, 2019 at Markham's Development Services Committee (DSC) meeting. DSC subsequently created a sub-committee to review staff's recommendations, and will report back in a timely fashion.

Request

That the Subject Lands designation as Employment Area in the City's Official Plan, is under site-specific appeal, be deferred until the City of Markham completes the Future Urban Area Secondary Plan process. This would allow the City sufficient time to plan this area to better align with its current vision for a 21st Century business park that is flexible and adaptable to the market, which could potentially permit non-traditional uses in the employment area.

Figure 1: Request to Redesignate Subject Lands



Context

The economic landscape of the GTA and York Region is shifting. The trend of economic activity moving to the suburbs has reversed and there is a growing concentration of office jobs going to the downtown core. This shift is evidenced by the slower growth in the kinds of economic activity that have historically been more dispersed throughout York Region. Advancement in technologies, automation and telecommuting has also redefined the workspace and impacted the level of space requirements and jobs.

York Region's research has acknowledged this shift and the impact on employment area needs to inform their policy review. The Region retained Watson & Associates Economists Ltd. (Watson) to undertake an analysis of regional and local employment trends to the year 2041. The purpose of the study was to address key trends regarding the evolving regional economy and the impacts of these changes on the rate and type of employment growth anticipated for York Region over the next 30 years. Particular attention was given to the potential influence of these economic trends on long-term employment land needs, mix of employment uses and the competitiveness of York Region and its Area Municipalities. As stated in Watson's Employment Trend's Review:

"There is a strong connection between the physical and social quality of place and economic growth in the knowledge-based and creative-based industries. Communities that offer a compact, transit-supportive and pedestrian-oriented environment with amenities, entertainment and culture activities and a mix of land uses with a critical mass, density and complexity, will create a sense of place and quality of life that will contribute to attracting jobs and talent. As such, consideration could be given to integrate residential, retail and prestige commercial and industrial uses within prestige employment areas and business parks across York Region." [emphasis added]

This changing economic landscape makes land use planning for employment uses challenging however there is a need to do things differently than in the past. Proper planning for employment uses is key to achieving Provincial, Regional and Municipal objectives of efficiently using

infrastructure and encouraging transit-supportive development. Conventional methods of planning for employment uses has traditionally promoted single-use employment blocks. This is evident in suburban office parks that have no residential and limited institutional uses and are dominated by low to mid-rise buildings with large surface parking lots with limited amenities for workers. They are largely auto dependent and the public realm is characterized by office buildings separated by large distances, with few destinations reachable on foot. Young workers especially are preferring amenity rich work environments with good access to public transportation so that they have the option of decreasing their auto dependency. The traditional suburban employment areas are becoming less attractive to these employees and in turn, employers are finding it harder to attract the best talent, especially when competing with downtown Toronto.

Developing the type of employment area that is going to attract talent is going to require a more integrated urban structure relative to traditional employment areas, which will include offering amenities and services convenient to local businesses and their employees and providing an opportunity to live closer to where people work.

The basis of this request to allow non-employment uses on the Subject Lands is not to remove the employment component entirely, but rather to provide greater flexibility to the site to be able to develop as a high-density mixed-use development. Permitting non-employment uses will allow the Subject Lands to adapt to a changing employment market where young educated workers are prioritizing workplaces that are increasingly accessible and closer to amenities. The success of downtown Markham, where a vibrant mix of uses activates the area from morning to night, is pedestrian friendly, and is transit-supportive, demonstrates that this type of development is possible in a suburban setting. This type of development can attract a range of residential and non-residential investments which in turn supports the economic resiliency of the City and Region.

Designating the Subject Lands exclusively for employment does not optimize the use of the land as a higher-density, vibrant mixed-use development that supports the transportation and public infrastructure investment would be better suited at this corner. A mixed-use development would contribute to the creation of a complete community and offer residents the ability to live, work and play in the same area.

History

As part of the previous City of Markham led MCR to implement the 2006 Growth Plan, Romandale Farms Ltd. representing the ownership's interests, requested a redesignation of the lands at 3450 Elgin Mills East to mixed-employment and residential uses. On October 22, 2013, Markham's Development Services Subcommittee referred the application request to the Future Urban Area Secondary Plan ("FUA SP") process, which is not expected to commence until at least after the Region's MCR process is complete.

Following this, the 2014 Official Plan designated the Subject Lands *Future Urban Area* (Map 1) and *Future Employment Area* (Map 3), which was also intended to be further refined through the FUA SP process. Since the adoption of the Markham 2014 OP, area-specific appeals were made by various owners including the North Markham Landowners Group ("NMLG"). NMLG continues to have several maps under appeal on an area-wide basis, including Map 1, Markham Structure and Map 3, Land Use (which proposes to identify the Subject Lands as *Future Employment Area*). Because these maps are under appeal on an area-specific basis, the proposed *Future Urban Area* and *Future Employment Area* designations are not in force and effect (with the underlying

Agricultural designation for the Subject Lands remaining in-force). Map 3 in particular remains under appeal because issue 36 remains outstanding. Issue 36 is as follows:

36. Should the Markham OP policies recognize and permit the finalization of the natural heritage network (including Core Area Enhancements and Core Linkage Enhancements) in the Future Urban Area (currently set out on Map 4) through the Secondary Plan(s) for that area?

There is therefore no Employment designation in the Region's Official Plan or the Markham OP and there should therefore be no requirement for a "conversion".

Conceptual Vision of the Subject Lands

The vision for the Subject Lands is to optimize this corner of Elgin Mills Road and Warden Avenue by proposing a compact development consisting of a vibrant mix medium and high-density residential uses, at-grade retail, office and recreational uses. The landowner's proposal would not eliminate employment uses, but re-position the lands from a single-use site to a multi-use development that is active throughout the day and night as opposed to only during business hours.

The location of the Subject Lands immediately south of a proposed Regional Works Yard (which in itself is not an employment use) severs the site from the larger employment area to the north and diminishes the potential of any site synergies that may have been available. The Regional Works Yard, in combination with the natural heritage system now represents a logical break between the Employment Area and the Mixed-Use Areas.

The Subject Lands are located within the Future Urban Area, which is planned to have water and sanitary services extended to service the area. It is already located at the key intersection of Elgin Mills Road East and Warden Avenue, which is also planned to be widened in the future. Warden Avenue is designated as part of the Regional Transit Priority Network and planned transit improvements along this corridor will occur in the future.

A mixed-use development for the Subject Lands will be compatible with the proposed mixed-use/residential uses to the south ("Berczy Glen") and what is anticipated to be similar uses to the east as part of the future urban area expansion. Moreover, a mixed-use development would align with the City's emerging vision for this area, Markham Innovation Exchange ("Markham Mix"). Markham Mix is an economic development initiative to create a new urban innovation district of regional and national significance in north Markham that will be home to a 21st century employment cluster containing an innovative and exciting diversity of knowledge-based employment and industrial activity with a mix of other uses.

The proposed conceptual development will maintain employment functions on lands that are otherwise of questionable attractiveness to the currently targeted uses by integrating residential, retail, entertainment and prestige commercial uses on the Subject Lands. The Subject Lands will contribute to the creation of compact, complete communities with a strong live-work balance, without impairing Markham's ability to accommodate its employment growth allocations and without burdening services capacities, while aligning with the City's vision for this area as a 21st century campus with a vibrant mix of uses.

Conclusion

Given the changing economic landscape that is seeing a trend towards more mixed-use and amenity driven employment areas that contain a vibrant mix of uses, which aligns with the City's vision for this area, it is our opinion that the redesignation of the lands to a new Employment Area designation that supports this is appropriate and good planning. York Region has an opportunity to recognize the evolving changes in business park areas and provide a more integrated urban structure that provides the flexibility to adapt and look to future, instead of planning for traditional employment areas like in the past. By deferring this decision until the City completes its FUA SP process, it allows the City sufficient time to comprehensively plan this area to align with its vision.

We thank you for your time in reviewing our request. Should you have any questions with respect to this request, please do not hesitate to contact me at 905.513.0170 x 109 or DGiven@mgp.ca

Yours very truly,

Malone Given Parsons Ltd.



Don Given, MCIP, RPP

cc *Marg Wouters, City of Markham*
 Joanne Barnett, First Elgin Mills Developments Inc.
 Diana Wu, Wu's Landmark Group Inc.
 Jeff Chan, MetroUnion