

July 2, 2024

MGP File: 20-2868

City of Markham  
101 Town Centre Boulevard  
Markham, ON L3R 9W3

**Attention: Mayor and Members of Council**

**RE: Markham Centre Secondary Plan Update  
YMCA of Greater Toronto  
101 YMCA Boulevard, City of Markham**

Malone Given Parsons Ltd. (MGP) is the planning consultant for YMCA of Greater Toronto (YMCA), the owner of YMCA Markham located at 101 YMCA Boulevard within the Markham Centre Secondary Plan (YMCA Lands).

YMCA has been participating in the Markham Centre Secondary Plan process since its initiation and most recently, provided comments on the Preliminary Concept Plan through a letter dated July 4, 2023 (see Appendix 1). This letter reiterated our comments from previous correspondences on May 6, 2022 (see Appendix 2) and March 22, 2021 (see Appendix 3). Collectively, these letters stated our concern that the Plan did not consider YMCA's long-term vision for its lands. The letter outlined YMCA's long-term vision for the lands which includes planning for some of the most significant height and densities in the order of 40+ storeys, and broadest land use permissions for the YMCA lands, which are well served by existing and planned transit infrastructure.

MGP has reviewed the draft Secondary Plan policies as well as the updated maps provided for the July 3<sup>rd</sup> Development Services Committee meeting and remain concerned that the Plan still does not rectify or address our issues.

Given that we have seen no major changes made to the YMCA Lands (except for the increase on a portion of the lands to 40 storeys) since the latest plans were presented, our comments from our previous letter remain valid and is referenced in Appendix 1.

We are concerned that our comments have continually not been taken into consideration for the Secondary Plan. As such, we would like to formally request a meeting with the City staff and the consultant team preparing the Secondary Plan to discuss these issues.

Yours truly,

**Malone Given Parsons Ltd.**



**Lauren Capilongo**  
Principal

cc: Mr. Stephen Lu, Manager, City of Markham  
Mr. Todd Pierce, YMCA

# APPENDIX 1



Lauren Capilongo  
905 513 0170 x112  
lcapilongo@mgp.ca

July 4, 2023

MGP File: 20-2868

City of Markham  
101 Town Centre Boulevard  
Markham, ON L3R 9W3

**Attention: Mayor and Members of Council**

**RE: Markham Centre Secondary Plan Update  
YMCA of Greater Toronto  
101 YMCA Boulevard, City of Markham**

Malone Given Parsons Ltd. (MGP) is the planning consultant for YMCA of Greater Toronto (YMCA), the owner of YMCA Markham located at 101 YMCA Boulevard within the Markham Centre Secondary Plan (YMCA Lands).

YMCA has been participating in the Markham Centre Secondary Plan process since its initiation and most recently, provided comments on the Preliminary Concept Plan through a letter dated May 6, 2022 (see Appendix 1). The letter stated our concern that the Plan did not consider YMCA's long-term vision for its lands. The letter outlined YMCA's long-term vision for the lands which includes planning for some of the most significant height and densities in the order of 40+ storeys, and broadest land use permissions for the YMCA lands, which are well served by existing and planned transit infrastructure.

MGP has reviewed the presentation materials provided for the July 5th Development Services Committee meeting and remain concerned that the Plan still does not rectify or address our issues.

Given that we have seen no changes made to the YMCA Lands since the latest plans were presented, our comments from our previous letter remain valid and is referenced in Appendix 1.

We are concerned that our comments have continually not been taken into consideration for the Secondary Plan. As such, we would like to formally request a meeting with the City staff and the consultant team preparing the Secondary Plan to discuss these issues.

Yours truly,

**Malone Given Parsons Ltd.**

A handwritten signature in blue ink, appearing to be 'L. Capilongo', is written over a faint, light blue circular stamp or watermark.

**Lauren Capilongo**  
Principal

cc: Mr. Stephen Lu, Manager, City of Markham  
Mr. Todd Pierce, YMCA

# APPENDIX 2



Lauren Capilongo  
905 513 0170 x112  
lcapilongo@mgp.ca

May 6, 2022

MGP File: 20-2868

City of Markham  
101 Town Centre Boulevard  
Markham, ON L3R 9W3

**Attention: Mayor and Members of Council**

**RE: Markham Centre Secondary Plan Update  
YMCA of Greater Toronto  
101 YMCA Boulevard, City of Markham**

Malone Given Parsons Ltd. (MGP) is the planning consultant for YMCA of Greater Toronto (YMCA), the owner of YMCA Markham located at 101 YMCA Boulevard within the Markham Centre Secondary Plan (YMCA Lands).

YMCA has been participating in the Markham Centre Secondary Plan process since its initiation and most recently, provided comments on the Preliminary Concept Plan through a letter dated March 22, 2021 (see Appendix 1). The letter stated our concern that the Plan did not consider YMCA's long-term vision for its lands. It should also be noted that we made a presentation at the December 10, 2020 Unionville Sub-Committee Meeting, where we outlined YMCA's long-term vision for the lands which includes planning for some of the most significant height and densities in the order of 40+ storeys, and broadest land use permissions for the YMCA lands, which are well served by existing and planned transit infrastructure.

**The YMCA Lands and its Presence in Markham Centre**

YMCA has been a fixture in Markham Centre for over 15 years, when YMCA chose to construct a brand-new purpose-built facility to serve Markham Centre and the broader Markham area. This was done at a time when no community services existed in Markham Centre. YMCA had a vision to establish itself as a community amenity that would serve the planned population and the Secondary Plan area continued to develop and build out over the long term.

YMCA continues to see itself as a key amenity to serve the existing and future Secondary Plan area population and as such, does not have plans to relocate at this time. While YMCA does not have any immediate plans to redevelop, their future vision for the lands includes establishing appropriate land use, heights and densities which are transit-supportive given the site's location adjacent to the GO Station, VIVA Rapidway station and the Proposed 407 Transitway. The establishment of these policies may provide YCMCA with future options for its lands.

## Comments on the Markham Centre Secondary Plan Update

MGP has reviewed the latest documents for the Markham Centre Secondary Plan Update including the latest presentation made to Development Services Committee on March 22, 2022 and April 5, 2022. While we acknowledge that staff have endeavored to resolve some of the issues we identified, we still have concerns with the latest Concept Plan. The remaining issues that have not been resolved include:

- **Height and Density** – The February 2021 Preliminary Concept Plan contemplated building heights and densities of 5-30 storeys and density of 7.0 Floor Space Index for the portion of the lands west of the proposed road extension and 5-16 storeys and density of 6.0 Floor Space Index for the lands on the east side of the proposed road.

We recognize that the March 2022 Revised Concept Plan proposes increased building heights to 6-40 storeys for the portion of the lands west of the proposed road extension and 6-35 storeys for the portion of the on the east side of the proposed road with a planned density of 6.0 FSI for both parcels.

We continue to have concerns with the proposed gradation of height and densities planned for the lands adjacent to the Go Station and the YMCA Lands. Of specific concern is the planned density of 9.0 FSI for the approved development north of the YMCA lands whereas the YMCA lands has a planned density of 6.0 FSI. We continue to believe that density on the lands adjacent to the planned Unionville Multi-Modal Station should be planned for greater densities. As such, we continue to believe that the planned density for the YMCA and the broader area adjacent to the planned station should be re-examined and increased which is consistent with Provincial Policies that speak to optimizing and leveraging transit infrastructure investment.

- **Road Network** - The Preliminary Concept Plans shown in the March 22, 2022 presentation) continues to propose an extension of Ravis Road southwardly through the YMCA Lands. If approved, this road extension will run directly through the existing YMCA building effectively severing the YMCA Lands. We are concerned with this scenario for a variety of reasons. Firstly, it will limit YMCA's ability to submit any necessary development applications to expand its existing facility as we expect that at the time of a potential future development application, the City will request the dedication of the road. Secondly, the extension of Ravis Road will have the effect of severing the lands into two smaller parcels, which, on its own, are virtually undevelopable. We would urge the City to evaluate an alternative road alignment for the broader block that eliminates the need to extend Ravis Road through the YMCA lands.
- **Land Use Designations** – While we recognize that it appears that the park and school designations have been removed from the site, which is a positive revision, the Preliminary Concept Plans continue to propose a Mixed Use Office Priority designation on the YMCA Lands. While we support a mixed-use designation for the YMCA Lands, it is our opinion that the Secondary Plan policies should mandate a realistic office employment space component rather than require a “majority” of the space to be office related. By permitting mixed-use development with a smaller office requirement, additional flexibility for transit-oriented developments will be provided, which will attract residential growth and employment investment. In addition, it will also facilitate the City's original vision for people and jobs to be in close proximity to transit.

- **407 Transitway** – We understand that the City is proposing a Preferred Route which would co-locate the Transitway with Hwy 407. YMCA supports this initiative as the current approved alignment of the 407 Transitway is planned to traverse the rear portion of the YMCA Lands. We understand that the City’s Preferred Route is not endorsed by Metrolinx. Our hope is that Metrolinx will study this Preferred Route through the Secondary Plan process and conclude that this represents the best alignment.

## Conclusion

It is our opinion that the City should modify the proposed development permissions as it relates to the YMCA Lands to permit a high-density development that allows a variety of uses without a restriction on the provision of a ‘majority’ of office space, nor an unnecessary impediment of a public road/407 transitway traversing the site. The Preliminary Concept Plans limit the possibility for a high-density mixed development that is transit supportive in close proximity to higher-order transit (VIVA BRT, Unionville GO and the planned Highway 407 Transitway). As such, it does not optimize the large investment the Province, Region and City has made in transit infrastructure. It remains our opinion that the opportunity to provide for transit-supportive tall buildings on the YMCA Lands must be enhanced in the Markham Centre Secondary plan update to align with Provincial interests.

We are concerned that our comments have not been taken into consideration for the Preliminary Concept Plan. As such, we would like to formally request a meeting with the City staff and the consultant team preparing the Secondary Plan to discuss these issues.

Yours truly,

**Malone Given Parsons Ltd.**



**Lauren Capilongo**

Principal

cc: Mr. Stephen Lu, Manager, City of Markham  
Mr. Todd Pierce, YMCA

# APPENDIX 3



Lauren Capilongo  
905 513 0170 x112  
lcapilongo@mgp.ca

March 22, 2021

MGP File: 20-2868

City of Markham  
101 Town Centre Boulevard  
Markham, ON L3R 9W3

**Attention: Mayor and Members of Council**

**RE: Markham Centre Secondary Plan Update  
YMCA of Greater Toronto  
101 YMCA Boulevard, City of Markham**

Malone Given Parsons Ltd. (**MGP**) is the planning consultant for YMCA of Greater Toronto (**YMCA**), the owner of YMCA Markham located at 101 YMCA Boulevard within the Markham Centre Secondary Plan (**YMCA Lands**).

YMCA has been participating in the Markham Centre Secondary Plan process since its initiation and most recently, made a presentation at the December 10, 2020 Unionville Sub-Committee Meeting. At that meeting, we outlined YMCA's long-term vision for the lands which includes planning for some of the most significant height and densities in the order of 40+ storeys, and broadest land use permissions for the YMCA lands, which are well served by existing and planned transit infrastructure.

**We have reviewed the Preliminary Concept Plan for the Secondary Plan Area and are concerned that the Plan does not consider YMCA's long-term vision for its lands.**

## **YMCA Location**

The YMCA Lands are approximately 1.6 hectares (4.0 acres) and located on the south side of YMCA Boulevard, immediately adjacent to the Unionville GO Transit Station (see Figure 1). The lands are currently occupied by the YMCA Markham facility, a surface parking lot, and a heritage home. The primary access is provided through the adjacent property to the west (owned by the Province) and a secondary/loading access is provided from YMCA Boulevard, just east of Ravis Road.

The YMCA Lands are located immediately adjacent to existing and planned higher-order transit (VIVA Bus Rapid Transit (**BRT**), Unionville GO and future Highway 407 Transitway) and as such are a prime opportunity for redevelopment to implement Provincial, Regional and City policy and optimize/leverage investments made by all levels of government to ensure transit usage viability. A proposal for redevelopment has the potential to integrate with the higher-order transit, which is in accordance with good transit-oriented development principles that have been implemented and encouraged by the City in other instances, and which are clearly stated Provincial objectives and requirements. As such, the opportunity to provide for transit-supportive tall buildings on the YMCA Lands must be enhanced through this update to the Markham Centre Secondary Plan, which is currently not illustrated in the Preliminary Concept.

**Figure 1: YMCA Lands**

### **The YMCA Lands and its Presence in Markham Centre**

YMCA has been a fixture in Markham Centre for over 15 years, when YMCA chose to construct a brand-new purpose-built facility to serve Markham Centre and the broader Markham area. YMCA sees itself as a key amenity to serve the existing and future Secondary Plan area population and as such, does not have plans to relocate at this time.

While YMCA does not have any immediate plans to redevelop, their future vision for the lands includes establishing appropriate land use, heights and densities which are transit-supportive given the site's location adjacent to the GO Station, VIVA Rapidway station and the Proposed 407 Transitway. The establishment of these policies may provide YCMCA with future options for its lands.

### **Comments on the Preliminary Concept for the Markham Centre Secondary Plan Study Area**

We have reviewed the Preliminary Concept Plan and YMCA has significant concerns with respect to the planned land use, height, density and planned road network. We believe the Preliminary Concept Plan results in a missed opportunity to locate significant density adjacent to the Unionville GO Station. Furthermore, the Preliminary Concept Plan proposes a structure, that in our opinion, is contrary to Provincial policies relating to locating density adjacent to existing transit infrastructure.

The YMCA Lands, as noted in the presentation, is located at the heart of a Primary Transit Node, immediately adjacent to the Unionville GO Station and VIVA BRT. Overall, it is our opinion that the development permissions restrict opportunities to locate significant transit-oriented development on the YMCA lands and does not optimize the large transit infrastructure investment made by the Province, Region and City. It remains our opinion that the opportunity to provide for a transit-supportive tall building on the YMCA Lands must be protected and enhanced.

## **1. Road Network**

The Preliminary Concept Plan proposes an extension of Ravis Road southwardly through the YMCA Lands. If approved, this road extension will sever the YMCA Lands and create two smaller parcels which will limit any future development opportunities. We expect that the extension of Ravis Road will have a right-of-way width of 18.0 metres. These residual blocks will have approximately 70 metres of frontage and are insufficiently sized to accommodate the planned vision for the YMCA Lands.

Secondly, from an overall block perspective, the proposed road provides a duplicate function to the surrounding ring road and in our opinion, does not contribute positively to the comprehensive planning of this larger block. Further and mostly importantly, this planned public road will not be delivered until YMCA vacates their property, which is not planned at this time.

## **2. Mixed Use Office Priority and Park and School Designations**

The Preliminary Concept Plan continues to propose a Mixed Use Office Priority designation on the YMCA Lands. While the detailed designation policies have yet to be released, we expect the policies will be similar to the Mixed Use Office Priority designation policies in the City's Official Plan. YMCA does have concerns with the current Mixed-Use Office Priority designation. We understand that the City's current Mixed Use Office Priority designation permits office employment uses and may also permit multiple unit residential uses and street-related retail and service uses integrated with the office uses. The current policy framework only permits residential development if a majority of the total gross floor area is built for office employment uses.

While we support a mixed-use designation for the YMCA Lands, it is our opinion that the Secondary Plan policies should mandate a realistic office employment space component rather than require a "majority" of the space to be office related.

By permitting mixed-use development with a smaller office requirement, additional flexibility for transit-oriented developments will be provided, which will attract residential growth and employment investment. In addition, it will also facilitate the City's original vision for people and jobs to be in close proximity to transit.

Secondly, it appears that the southeast portion of the YMCA Lands is proposed for park and school. We are concerned that the YMCA Lands is being overburdened by a series of community infrastructure uses which will hinder any future development opportunity.

## **3. Height and Density**

With the proposed road extension severing the YMCA Lands in two, both parcels are proposed with differing height and density permissions. The portion of the YMCA Lands to the west of the proposed road extension is planned with a height permission of 5-30 storeys and density of 7.0 Floor Space Index while the lands on the east side of the proposed road are planned with a height permission of 5-16 storeys and density of 6.0 Floor Space Index.

It is our opinion that the height and density permissions are not reflective of the existing and planned infrastructure that is located adjacent to the YMCA Lands. Densities between 7.0 and 9.0 have been approved elsewhere within Markham Centre for lands that are much further away from key transit infrastructure, not adjacent to the GO Station, not adjacent to VIVA BRT dedicated bus lanes, and also not located in close proximity to the proposed Highway 407 transitway. As the



YMCA Lands benefit from all of the aforementioned infrastructures, it is our opinion that there should accordingly be greater height and density permissions for the lands.

Furthermore, the Preliminary Concept has assigned significant density and height to the GO Transit lands (40 storeys and 10 FSI) which is the location of transit infrastructure key to the development of the Secondary Plan area. Given that the YMCA Lands are immediately adjacent to the GO Station, it is our opinion that the same height and density permissions should be extended to the YMCA Lands and the broader block area.

#### **4. 407 Transitway**

The current alignment of the 407 Transitway, as shown in the approved Environmental Assessment Report, is planned to traverse the rear portion of the YMCA Lands. We note that as part of the Secondary Plan process, the City is reviewing the route in conjunction with the Ministry of Transportation. The Preliminary Concept Plan proposes a re-alignment of the 407 Transitway route which will see the Transitway running parallel to the Highway 407, which YMCA is supportive of.

### **Conclusion**

It is our opinion that the City should modify the proposed development permissions as it relates to the YMCA Lands to permit 40+ storeys with a corresponding density permission, in addition to allowing a variety of uses without a restriction on the provision of a 'majority' of office space. The Preliminary Concept limits the possibility for a high-density mixed development that is transit supportive in close proximity to higher-order transit (VIVA BRT, Unionville GO and the planned Highway 407 Transitway). As such, it does not optimize the large investment the Province, Region and City has made in transit infrastructure. It remains our opinion that the opportunity to provide for transit-supportive tall buildings on the YMCA Lands must be enhanced in the Markham Centre Secondary plan update to align with Provincial interests.

We are concerned that our comments have not been taken into consideration for the Preliminary Concept Plan. As such, we would like to formally request a meeting with City staff and the consultant team preparing the Secondary Plan.

Yours truly,

**Malone Given Parsons Ltd.**



**Lauren Capilongo**

Principal

████████████████████

cc: Mr. Stephen Lu, Manager, City of Markham  
Mr. Todd Pierce, YMCA

July 2, 2024

MGP File: 13-2185

City of Markham  
101 Town Centre Boulevard  
Markham, Ontario, L3R 9W3

via email: [clerkspublic@markham.ca](mailto:clerkspublic@markham.ca)

**Attention: Mayor and Members of Council**

**RE: Special Development Services Committee Meeting  
Item 4.1, Markham Centre Secondary Plan Update: Draft Policy Framework  
Submissions by Dorsay Development Corporation**

Malone Given Parsons Ltd. (“MGP”) is the land use planning consultant for Dorsay Development Corporation (“Dorsay”), the owner of approximately 1.05 hectares of land located on the east and west sides of Circa Drive, north of Highway 7 East in the City of Markham (the “City”), legally described as Part of Lot 11, Concession 4 and Part of Block 3 of 65M-2503 (the “Subject Lands”).

Dorsay has been an active participant throughout the City’s update processes for both its official plan update and the Markham Centre Secondary Plan update. Dorsay is an appellant of the 2014 City Official Plan and has site-specific Official Plan and Zoning By-law Amendment and Site Plan applications currently under appeal, with a hearing scheduled to begin on July 15, 2024.

On behalf of Dorsay, we have reviewed the City’s draft Markham Centre Secondary Plan (“Draft MCSP”) and staff report to be considered at the Special Development Services Committee Meeting on July 3, 2024 and write to raise our concerns. Given that the Draft MCSP was only recently released, we reserve our right to provide further comments once we have reviewed in detail.

Our primary concerns, as re-iterated in previous submission to this Committee and to staff throughout the secondary plan update process, are:

- The west portion of the Subject Lands should be designated as Mixed Use High Rise and not Mixed Use Office Priority, as currently drafted; and
- The Subject Lands should permit greater maximum heights and densities consistent with Dorsay’s site-specific Official Plan and Zoning By-law Amendment applications which currently propose a maximum height of 35 storeys and a maximum density of 8.4 FSI.

For the reasons previously identified in correspondence to the City, and summarized again below, we believe that the proposed designation and the maximum height and density limits are not reflective of the planned context or the best use of the Subject Lands.

Throughout each of the municipal processes identified above, Dorsay has indicated to the City that the Mixed Use Office Priority designation on its lands west of Circa Drive is not appropriate or good planning. It is our opinion that the Subject Lands in their entirety should be designated Mixed Use High Rise to allow for maximum flexibility of land uses and high-density built forms.

The Mixed Use Office Priority designation requires a minimum office component in any development scenario, regardless of whether the market demand for such use exists. Dorsay has attempted to find tenants for office use on the property for more than 20 years without success. From a planning and access perspective, this is likely due to a number of factors including limited vehicular access for potential office users (from Circa Drive only), no ability to provide on site parking other than through underground parking solutions, and the lack of adjacent office uses and buildings to provide business clusters and synergy with other tenants. In our opinion, it is not good planning to designate these lands for Mixed Use Office Priority when it has been demonstrated that the use is unlikely to be realized in this location, particularly as there are other more desirable locations within Markham Centre for office uses that are not burdened with these constraints.

Changing market trends and market demand, fueled in part by the COVID-19 pandemic, as well as evolving tenant needs and the overall vision for the Markham Centre Urban Growth Centre have necessitated the need for a reconsideration of land uses on the Subject Lands. As such, we believe that the Markham Centre Secondary Plan update process should seek to accommodate the office related jobs historically allocated to the Subject Lands on other more optimal sites.

Furthermore, the planned and emerging context within the Markham Centre Urban Growth Centre and the proposed Major Transit Station Area (Town Centre Blvd BRT Station) within which the Subject Lands are located are for a compact, high-density community. A maximum height of 12 storeys and 4 FSI in the Draft MCSP do not reflect the intensification targets and built form anticipated in an area specifically identified for the highest and densest uses. It is our opinion that Dorsay's proposed development, at a maximum height of 35 storeys and a maximum overall density of approximately 8.4 FSI, is a more appropriate built form for the Subject Lands. As one of the last remaining vacant parcels within this area, the Subject Lands represent an excellent opportunity to accommodate higher density forms of housing in the midst of a Provincial housing crisis, in a transit-supportive form, next to a Priority Transit corridor and existing infrastructure, within an Urban Growth Centre.

We also note that the Map SP8 of the Draft MCSP does not appear to accurately reflect the approved heights of development on the south side of Highway 7, west of the continuation of Circa Drive. The Draft MCSP should include the heights and densities of all approved developments.

We thank you again for the opportunity to provide input into the Markham Centre Secondary Plan update process. Please do not hesitate to contact the undersigned if you have any questions or concerns.

Yours very truly,  
Malone Given Parsons Ltd.



**Matthew Cory, MCIP, RPP, PLE, PMP**

**Principal, Planner, Land Economist, Project Manager**

cc. Client

July 2, 2024

City of Markham  
17250 Yonge Street  
Newmarket, ON  
L3Y 6Z1

Sent via email to: [clerkspublic@markham.ca](mailto:clerkspublic@markham.ca) ; [yourmarkhamcentre@markham.ca](mailto:yourmarkhamcentre@markham.ca)

**RE: Infrastructure Ontario Comments on the Recommended Draft Policy Framework for the Markham Centre Secondary Plan Update (Item 4.1 – Special Development Services Committee – July 3, 2024)**

Infrastructure Ontario (IO) is a crown agency responsible for the strategic management of the provincial realty portfolio on behalf of the Ministry of Infrastructure (MOI). Part of IO’s mandate is to protect and optimize the value of the province’s real estate portfolio, while ensuring real estate decisions reflect public policy objectives.

The Province currently owns two parcels of land affected by the Draft Markham Centre Secondary Plan Update. This first being lands leased to IBM that are generally located on the south side of the Yorktech Drive private driveway, west of Warden Avenue and north of Highway 407 (the “IBM Lands”), as shown in Figure 1. The second, lands located in the South Unionville neighbourhood on the east side of Greenberg Gate north of Highway 407 (the “South Unionville Lands”), shown in Figure 2.



Figure 1: Provincial Lands Leased to IBM in Markham Centre

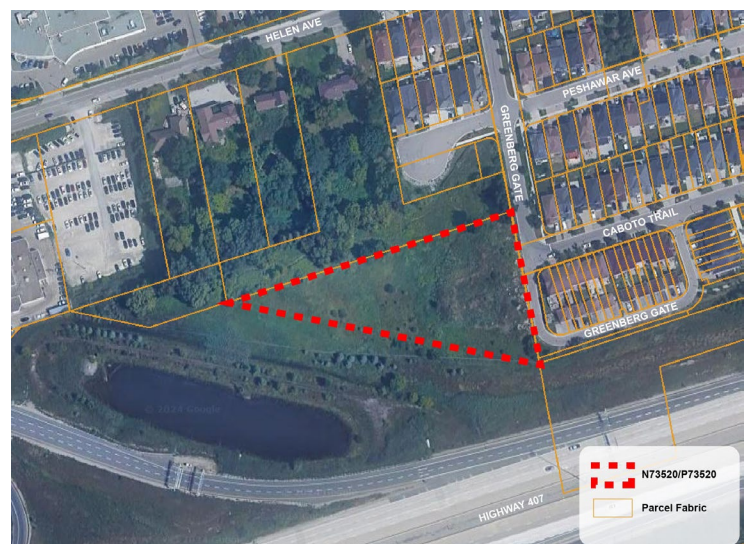


Figure 2: Provincial Lands within the South Unionville Neighbourhood in Markham Centre

As noted in previous correspondence IO has provided multiple sets of comments to both the Region of York and City of Markham noting our issues with the IBM Lands being designated as a *Major Park*. Through IO, the Province has provided IBM with a long-term lease that expires in 2098. IO understands that IBM's Markham Software Lab, which is located north of these lands, currently employs over 2,500 employees and is one of the top employers in Markham. The lands IO leases to IBM are important as they could house a future expansion for IBM or other employment-generating uses and IO wishes to maintain their developability.

We further add concern over the proposed partial redesignation of the South Unionville Lands from *Residential Low-Rise* to *Park Open Space*. It is IO's preference that the entirety of the South Unionville Lands be removed from the Markham Centre Secondary Plan Area. We also kindly request confirmation of the Official Plan Designation for the remaining lands outside of the Markham Centre Secondary Plan Area.

### **Background**

At the regional level, the 2022 York Region Official Plan ("ROP") designates the IBM Lands as *Employment Area* (Figure 3). Appendix 1 of the 2022 ROP identifies this *Employment Area* zone as the Highway 404 and Highway 407 Employment Area Zone, which has a density target of 100 jobs per hectare. Other portions of the IBM Lands are located within the *Regional Greenlands System*.

The South Unionville Lands are designated *Community Area* (Figure 4) in the ROP, which is where most of the housing required to accommodate the forecasted population will be located.



Figure 3: Region of York Official Plan 2022 - Map 1A Land Use Designations – IBM Lands



Figure 4: Region of York Official Plan 2022 - Map 1A Land Use Designations – South Unionville Lands

At the municipal level, the 2014 Markham Official Plan (“OP”), which is partially still under appeal, designates the IBM Lands as *Business Park Employment* and *Greenway* according to their Map 3 – Land Use (Figure 5). The 1987 Markham OP identifies the Subject Site as *Commercial and Community Amenity Area*. The Subject Site is also located within the boundaries of the Markham Centre Secondary Plan. Policy 9.12.4 of the 2014 OP notes that the land use designations for the Markham Centre lands shown on Map 3 shall be used to inform the update of the Markham Centre Secondary Plan.

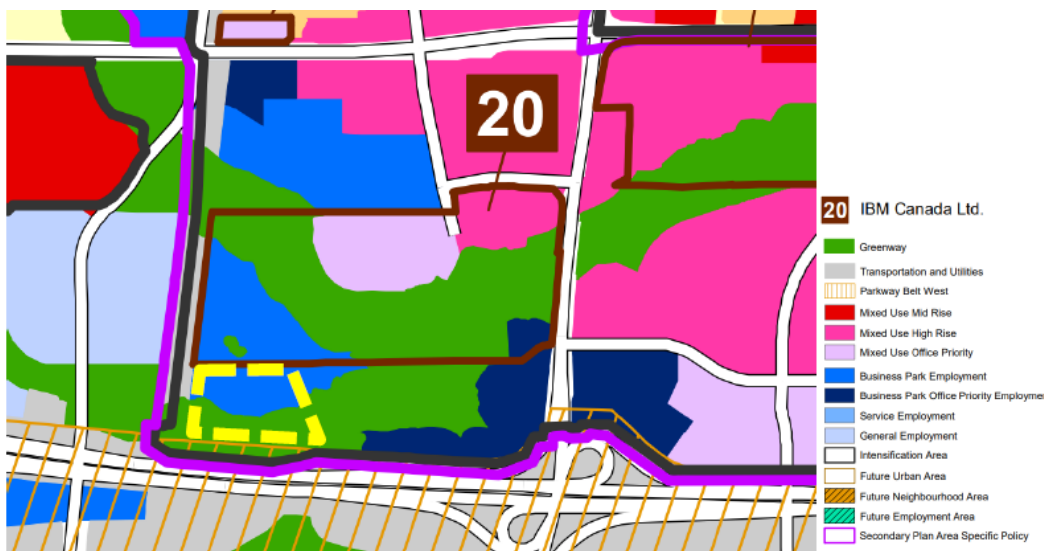


Figure 5: 2014 City of Markham Official Plan Map 3 - Land Use Designations – IBM Lands

Map 1 of the OP identifies that the South Unionville Lands are located within the *Neighbourhood Area* of the City Structure. Map 3 (Figure 5) designates these Lands as *Residential Low Rise*.

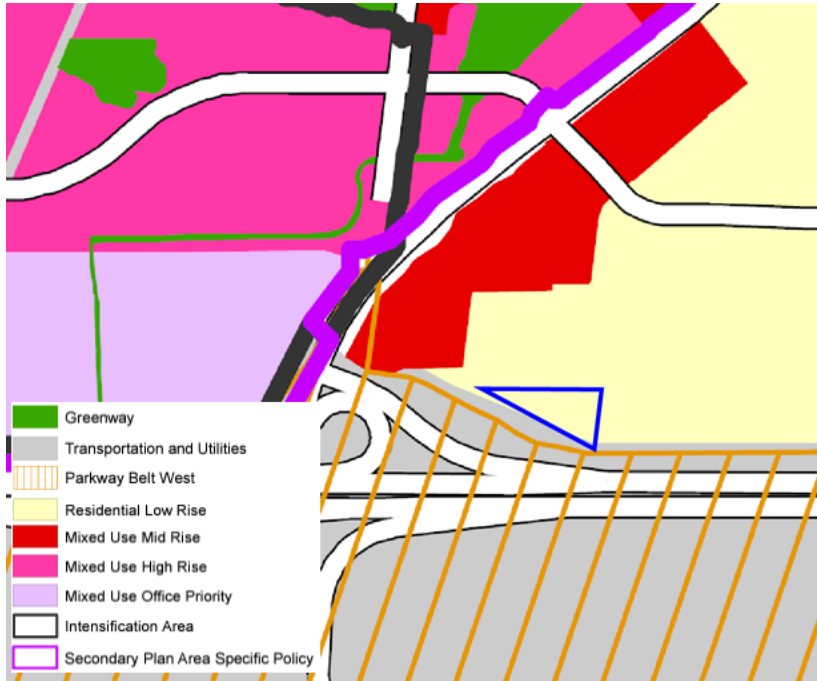


Figure 5: 2014 City of Markham Official Plan Map 3 - Land Use Designations – South Unionville Lands

The current recommended Development Concept that is being used to inform the Markham Centre Secondary Plan update identifies a *Major Park* over the entirety of the IBM Lands and an *Active Park* on the portion of the South Unionville Lands within that is within the Secondary Plan boundary (Figure 6).

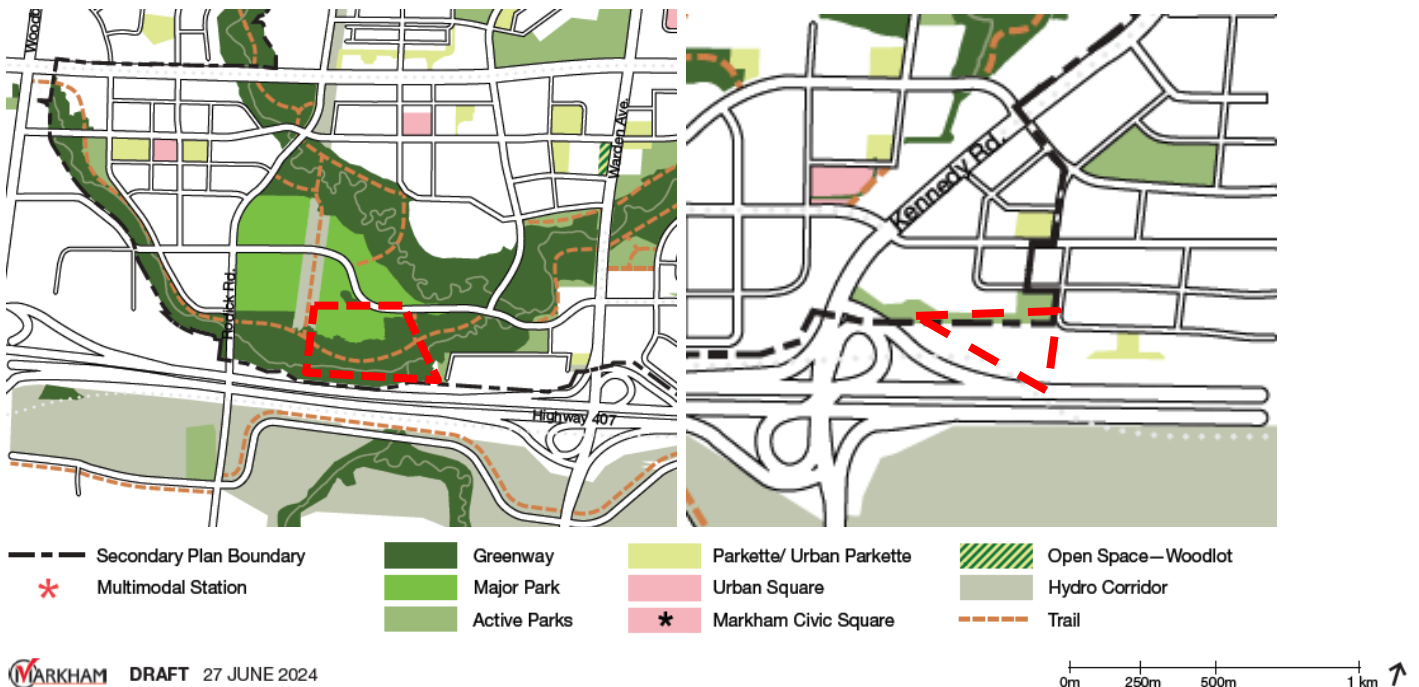


Figure 6: Markham Centre Recommended Development Concept



While the South Unionville Lands are only partially within the Markham Secondary Plan Area, a demonstration plan within the Development Concept Report identifies a park atop of the entire property (Figure 7). IO seeks clarity on whether it is the City's intent to further redesignate the balance of the property as Parks/Open Space. It would be IO's preference that the entirety of the South Unionville Lands be removed from the Markham Centre Secondary Plan Area and remain as Residential Low-Rise.



Figure 7: Markham Centre Demonstration Plan, Source: December 2023 Recommended Development Concept Report

### **Specific Comments on Draft Secondary Plan Policies**

Various policies within the draft Secondary Plan promote a diverse and complete community. The IBM lands have the potential to contribute to this notion by providing for a variety of uses and jobs within Markham Centre. Our comments on specific policies are shown below in green and include:

- 1) P. 15, Section 2.1 (Vision) - *As the centre of civic life and a hub of activity, Markham Centre draws people from across the city and the region to live, work, learn, play, and participate in the Markham community. Major public spaces, institutions, and facilities solidify its role as a meeting place. Building on its success as a high-tech hub and place of innovation, a range of businesses serve as an engine of economic prosperity that establishes Markham Centre as an area of significant employment. The IBM Lands should remain designated as employment to help promote Markham Centre as an area of significant employment.*
- 2) P. 17, Section 2.2.3 (a) (Support a Diverse and Prosperous Economy) - *To promote a robust and diversified mix of uses that establishes Markham Centre as an area of significant*



*employment.* The IBM lands constitute a significant employment area and should be designated as such.

- 3) P. 23, Section 3.2.1 - *It is the policy of Council that Markham Centre shall be developed to include all the amenities required for a complete community, including retail, services, schools, day cares, community facilities, parks, and employment opportunities. These amenities will be located to promote accessibility by walking and integrated with active transportation networks. The IBM lands should remain designated as employment in order to contribute to the notion of a complete community.*
- 4) P. 28, Section 4.2.2 - *That the Uptown District, west of Warden Avenue, shall feature a concentration of employment-generating uses, including office, that is significant, but secondary to, the Downtown District. The IBM lands are located west of Warden and constitute significant employment. They should be designated to reflect this.*
- 5) P. 60, Section 8.2 (Net Zero Greenhouse Gas) - *Mitigating the impact of the Markham Centre community on climate change and preparing for climate change's impacts on this community are essential parts of sustainable development. The City commits to achieving net zero emissions by 2050. Net zero emissions means achieving a balance between the amount of greenhouse gases released and the amount taken out of the atmosphere. Two essential components to achieving this goal are reducing the energy requirements of the community and transitioning away from fossil fuels toward the use of renewable sources of energy. The IBM lands contribute to net zero emissions by maintaining employment opportunities in the community and support development of the local transportation system (Section 9.1 of the Secondary Plan) including development of the PMTSA 7 – Cedarland BRT Station, as shown on Map SP3.*
- 6) P. 85, Section 10.4.1. (Business Park Employment) – *The 'Business Park Employment' designation covers a limited portion of the Secondary Plan Area. Lands designated 'Business Park Employment' are to be planned and developed for prestige industrial and office development, frequently in larger scale buildings located on large properties. Development within this designation will contribute to the range of employment-generating uses present in the Markham Centre. The IBM lands fit within this description and should be maintained as employment.*

Head Office

One Dundas Street West  
Suite 2000, Toronto, ON  
M5G 1Z3

Siège de direction

1, rue Dundas Ouest  
bureau 2000, Toronto, ON  
M5G 1Z3



**Conclusion**

IO supports the City's efforts to update the Markham Centre Secondary Plan, however, we respectfully request that the parkland designations be removed from both sites and that the same permissions on the lands as given through the *Business Park Employment* and *Residential Low-Rise* designations provided in the 2014 and 1987 City of Markham Official Plans be retained. We further request that the small portion of the South Unionville Lands be removed from the Markham Centre Secondary Plan Area in its entirety.

IO is currently completing a detailed review of the draft Markham Centre Secondary Plan policies and schedules and requests to reserve the right to provide additional comments throughout the remainder of the Secondary Plan update process.

We would like to thank Staff for taking the time to carefully consider our comments and request. Please do not hesitate to contact us should you have any questions.

Sincerely,

Amy Emm MCIP RPP  
Director, Land Use Planning

CC: David Macey, IO  
John Cimino, IO  
Alison Quigg, IO

July 2, 2024

Members of Development Services Committee  
and  
Planning and Urban Design Department

Re: Markham Centre Secondary Plan Update  
Draft Policy Framework  
On behalf of Markham Centre Landowners Group

Macaulay Shiomi Howson Ltd. (MSH) is the planning consultant for the Markham Centre Landowners Group (MCLOG), a group made up of prominent owners/developers of lands throughout Markham Centre.

The MCLOG have been engaged throughout the Markham Centre Secondary Plan (MCSP) process and have provided comments where appropriate, as part of the consultation process. The group has an ongoing interest in the Secondary Plan process. A number of letters have been forwarded to Development Services Committee, members of Council and City Planning Staff, on behalf of individual landowners and from the MCLOG outlining our concerns with the Secondary Plan.

On behalf of the MCLOG, we provided formal comments as follows:

- October 2022 – regarding July 2022 Development Concept;
- February 2023 – regarding February 2023 Open House presentation;
- September 2023 – regarding July 2023 Recommended Development Concept.

Our previous comments included among other items, matters related to:

- Floor Space Index (FSI)/density, building heights and inconsistencies between the density and height regime;
- The location, distribution and amount of open space and parkland and the inconsistency of these spaces with the maximum amounts permitted in Provincial legislation;
- Densities in employment areas;
- Heights and densities closest to the transit nodes;
- The provision for rail-deck parks, POPS and stratified parkland.

The MCSP Draft Policy Framework was published last week, and members of the MCLOG, along with consultants will review the draft framework and updated mapping to provide further input to the process. While it appears that some revisions have been made in response to members comments, it also appears that there is more that can and should be done.

---

Based on discussions with staff, we understand that this is the beginning of the public consultation process on the Draft Policy Framework. As the MCLOG represents many members of the development community in Markham Centre, we would ask that the City hold specific engagement meetings with the MCLOG and its members, so that the final MCSP can be a document that works in the best interest of both the City and members of the group who continue to build the Markham Centre Community.

We look forward to continued engagement on the Draft Policy Framework, a response to our previous comments and refinements to the MCSP.

Should you have any questions regarding the information contained herein, please contact me directly, thank you.

Sincerely,  
MACAULAY SHIOMI HOWSON LTD.

*Nick Pileggi*

Nick Pileggi, RPP  
Principal