

8 January 2025

Jessie Huang & Duran Wedderburn Planning and Development Services Markham Civic Centre 101 Town Centre Boulevard Markham, Ontario L3R 9W3

Attention: Jessie Huang and Duran Wedderburn

Dear Ms. Huang and Mr. Wedderburn,

RE: City of Markham Official Plan Review January 23, 2025 – Special Meeting of Council Submission of Preliminary Comments Bridge Station Master Plan Ministerial Zoning Order – O.Reg 345/22 Our File: 05.705.06

### Background

WND Associates has been retained by Condor Properties Ltd. ("Condor") with respect to the submission of comments on the City of Markham's Official Plan Review process. It is our understanding that on January 23, 2025 a Special Meeting of Council will be held with a report anticipated from City Planning Staff as it relates to the current status of the City's Official Plan Review process.

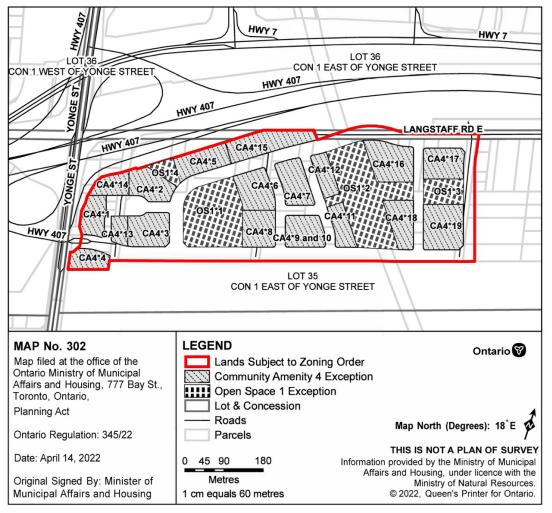
The Official Plan Review is currently in Phase 1 (Pre-planning) where Staff continue to engage with various stakeholders; however, no draft policy updates are to be released at this time. Condor is a majority landowner in the 25 ha Bridge Station Master Plan ("the BSMP") Transit-oriented Community approved through an MZO (O. Reg 345/22) in April of 2022 (**Figure 1**)

The City of Markham's Official Plan was last updated in 2014 and pre-dates contemporary planning policy documents at both the Provincial and upper-tier municipal planning levels including: the 2024 Provincial Planning Statement, the in-force 2022 York Region Official Plan and other Ministerial Zoning Orders (MZOs). At a high-level, it is positive that Council is recognizing the changing nature of the planning policy context and the need for contemporary planning policies. This letter contains policy considerations for the BSMP through the Official Plan Review process. Although, in our opinion, the MZO's density permissions are deemed to prevail over any conflicting policy which may be introduced through this

Official Plan Review, the process nevertheless presents an opportunity to align Provincial, Regional and local (Markham) planning objectives with both the significant investment in transit infrastructure and creation of much needed housing which will be delivered over the next 40 years in the BSMP.

Part of Lots 35 and 36, Concession 1 (Markham); Lots 20, 27, 45, 48, 49, 98, 100, 104-107; Benson Ave, Ruggles Ave, and Cedar Ave; Part of Lots 8-16, 21, 28, 33-37, 39, 40, 41, 44, 46, 93, 94, 96, 97, 99, 101-103, Part of Church Street on Registered Plan 2386,

City of Markham, Regional Municipality of York



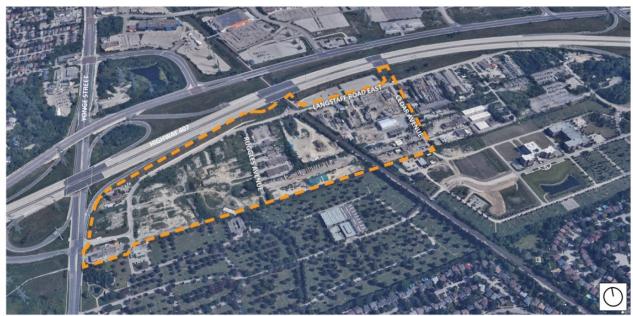
#### Map Description:

This is map no. 302 referred to in a Minister's Zoning Order. It shows lands which are located in Part of Lots 35 and 36, Concession 1 (Markham); Lots 20, 27, 45, 48, 49, 98, 100, 104-107; Benson Ave, Ruggles Ave, and Cedar Ave; Part of Lots 8-16, 21, 28, 33-37, 39, 40, 41, 44, 46, 93, 94, 96, 97, 99, 101-103, Part of Church Street on Registered Plan 2386, City of Markham, Regional Municipality of York. We are committed to providing accessible customer service (https://www.ontario.ca/page/accessible-customer-service-policy). On request, we can arrange for accessible formats and communications supports. Please contact MMAH by email (mininfo@ontario.ca) for regulation details.

Figure 1: O. Reg. 345/22 Map

### **Bridge Station Master Plan**

The BSMP was formerly known as the Langstaff Gateway Master Plan area. Prior to the MZO, the Langstaff Gateway Master Plan was governed by the City of Markham's Langstaff Gateway Secondary Plan (OPA 183; Approved by Council in 2010). This Secondary Plan was the product of prior years of study through a master plan process in 2008 led by Calthorpe and Associates. The Langstaff Gateway Master Plan area is 47 ha in size and the BSMP subject to the MZO is 25 ha generally west of Cedar Avenue (**Figure 2**). The balance of the lands to the east towards Bayview Avenue are currently the subject of a Community Housing Infrastructure and Accelerator Order which has not yet been approved.



BRIDGE STATION MASTER PLAN TOC BOUNDARY

#### Figure 2: Bridge Station Master Plan Existing Aerial

At full build-out projected in the year 2066, the 25 ha Master Plan will have delivered 19 mixed-use highdensity development blocks, a projected 20,000 residential units, new public schools, library and community space totaling 17,522 square metres, 17,350 square metres of retail space, a minimum of 145,701 square metres of office space, 5.04 ha of parkland, a network of public streets equipped with surface transit and active transportation routes and infrastructure, and a future mobility hub consisting of subway, GO Regional Express Rail and bus-rapid transit modes. The BSMP is anticipated to implement innovative and highly urbanized forms of infrastructure such as vertically integrated public schools.

Overall, 1.86 million square metres of developable gross floor area is planned spanning this 40+ year buildout horizon. On completion, the Bridge Station Master Plan will be home to a projected 35,600 future residents and have floor area reserved for between 9,000 to 12,000 jobs in support of complete community building objectives, translating to a density of between 1,700 to 1,800 people and jobs per hectare. The BSMP area is one of only a few nodes in the GTA outside of the Union Station Major Transit Station Area where four modes of transit are expected to converge (GO Train, Subway, Viva BRT and YRT).

## 2024 Provincial Planning Statement

The 2024 Provincial Planning Statement ("the 2024 PPS") came into force and effect on October 20, 2024 and repeals an earlier Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe.

Policy Section 2.1.3 sets out:

"3. At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.

Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans."

Further, the BSMP is within the Langstaff GO-Bridge Station Major Transit Station Area ("MTSA") delineation recognized by the in-force York Region Official Plan as further described in the sections below. Policy Section 2.4.2.3 of the 2024 PPS sets out the following direction for Planning Authorities with respect to growth and development in MTSAs:

"are encouraged to promote development and intensification within major transit station areas, where appropriate, by: a) planning for land uses and built form that supports the achievement of minimum density targets; and b) supporting the redevelopment of surface parking lots within major transit station areas, including commuter parking lots, to be transit-supportive and promote complete communities".

### 2022 York Region Official Plan

The 2022 York Regional Official Plan ("the YROP") was approved in November 2022 with modifications by the Province of Ontario's Ministry of Municipal Affairs and Housing. The current version of the YROP also reflects changes from the Province's Bill 150 in December 2023 and Bill 162 in February 2024 to reverse some of those modifications. The June 2024 consolidation represents the in-force version of the YROP.

The Langstaff GO-Bridge Station MTSA is planned for a minimum density target of 1,200 People and Jobs per ha. As shown in the bronze colour in the excerpt below, the MZO delineation is already recognized by the Region as having a higher density target than lands east of Cedar Avenue (**Figure 3**).

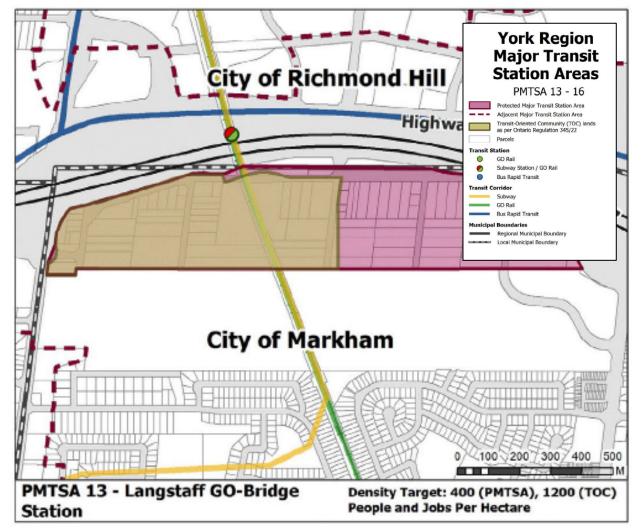


Figure 3: York Region Official Plan PMTSA 13: Langstaff GO-Bridge Station

Further, YROP Policy Section 4.4.24. (O) sets out the following with respect to new schools and community facilities:

"<u>Requirements for community facilities, new school sites, to be constructed to an urban</u> <u>standard</u>, including the consideration of alternative site size and design standards, multistorey buildings, shared facilities, proximity to transit, and measures to support active transportation;"

### **Preliminary Comments**

Based on the foregoing considerations, we recommend the following preliminary policy considerations as part of the initial draft of OP policies:

- Repealing the in-force 2010 Langstaff Gateway Secondary Plan as it is no longer applicable to the lands within the MZO boundary. The YROP Official Plan approved by MMAH already recognizes this by assigning a different minimum density target to the MZO. New policies should not be introduced which would conflict with the detailed block-by-block density and land use approvals described in O. Reg 345/22.
- Growth which is forecasted by the in-force MZO should be accounted for by the municipality as per Policy 2.1.3 of the 2024 PPS outlined above. This additional growth shall be incorporated into the Official Plan Review in addition to the population forecasts and projected infrastructure needs which will be studied for the balance of the municipality.
- 3. Policies should not preclude encumbered parkland within the boundaries of the MZO. The MZO permits full parkland credit for encumbered parkland.
- 4. Strategic Growth Area and MTSAs policies at the local planning level should be consistent with the YROP in that the BSMP needs to be recognized for its much greater minimum density target than the balance of MTSAs served by GO and subway in Markham. Strategic Growth Area and MTSA policies should also be consistent with the Province's new direction as per the 2024 PPS.
- 5. Policies should be introduced for vertically integrated schools and community facilities consistent with in-force YROP policies which recognize an urban model for the delivery and development of schools and community services. As previously submitted to the City of Markham through the Phase 1A application, there are several examples of approved, under-construction and operational vertically integrated schools in the City of Toronto operated by the TDSB.
- Given the significant supporting studies put forward by Condor during the BSMP municipal submission process in 2021, scoped complete application requirements for future Draft Plan of Subdivision Applications should be considered over the phased 40+ year time horizon of the buildout.

We submit these preliminary comments for your consideration and understand feedback from various stakeholder groups continues to be received. We look forward to the opportunity to comment on further drafts of the policies once they are made available. We would welcome the opportunity to meet with Staff to discuss our preliminary comments. Please circulate the undersigned and Kevin McKrow on all notices related to the Official Plan Review.

Respectfully submitted,

# **WND** associates

planning + urban design

Andrew Ferancik, MCIP, RPP Principal and President