



“TOGETHER OUR VOICE IS STRONGER”

<http://unionvilleresidents.com>

Comments on ERO 025-1099 “Consultation on Simplifying and Standardizing Official Plans” – DO NOT PROHIBIT SECONDARY PLANS!

Submitted to: PlanningConsultation@ontario.ca

November 20, 2025

The Unionville Residents Association (URA) is one of Markham’s largest and most active resident associations. In a rapidly growing city like Markham, much of our work involves reviewing and commenting on development plans and the ancillary hard and soft infrastructure that is needed, like roads, parkland, schools, etc., all with the goal of creating a growing liveable community.

The Markham and York Region Official Plans (OPs) are key guiding documents to help us verify if a particular development proposal represents “good planning”. We have no comment on the various proposals to standardize the structure and content of OPs.

However, we have a **lot of concern** about the idea of potentially prohibiting the use of secondary plans. In Markham, these are in place or in draft form for most Major Transit Station Areas (MTSAs). Consistent with provincial policy, all of these MTSAs are planned to have high population and high density, often adjacent to stable low-rise residential neighbourhoods. For example, the final draft Markham Centre Secondary Plan identifies a population of 139,000 and 55,000 jobs in an area of about 425 ha with dozens of land owners, for a density of 450 people+jobs per hectare. The draft Markville Secondary Plan contemplates 26,000 people and 15,000 jobs with a density of 400 people+jobs/ha.

For developments that are this intense, it is **vital** that population and employment levels, local roads, collector roads, parkland, schools, community centres etc. be **planned in detail** using technical modeling and analysis, in order to confirm liveable future communities. If there are no secondary plans, this level of detail would have to be contained in the OP, which would make it unduly large. Or we go back to planning one development proposal at a time which gives no context on how the total community would function.

Detailed secondary plans are also an efficiency item for developers, staff and residents. It gives these stakeholders a clear message as to what is good planning for an area. If a particular development is consistent with the secondary plan, this simplifies the analysis as to if it is appropriate.

In conclusion, please continue to permit and encourage secondary plans as vital components in Ontario’s planning process.