

February 25, 2020

*MGP File: 17-2612*

Richmond Hill Council  
225 East Beaver Creek Road  
Richmond Hill, ON L3B 3P4

via email: [clerks@richmondhill.ca](mailto:clerks@richmondhill.ca)

Dear Mayor Barrow and Members of Council:

**RE: Council Meeting, February 26, 2020  
Agenda Item 13.10 (SRPRS.20.004) – York Region’s Municipal Comprehensive Review (Part 2): Major Transit Station Areas, Settlement Area Expansion, and Agricultural System  
Yonge Street and 16<sup>th</sup> Avenue Key Development Area Boundary  
9144 Yonge Street, Richmond Hill**

Malone Given Parsons Ltd. (“MGP”) is the planning consultant to Brookvalley Management Inc, the owners of 9144 Yonge Street, located on the west side of Yonge Street, north of Oak Avenue, in the City of Richmond Hill. We are currently working with the owners of 9174 Yonge Street and 9184 Yonge Street to comprehensively plan for all three properties (the “Expansion Lands”).

We are writing in response to Richmond Hill’s February 26, 2020, Council Agenda Item 13.10 “York Region’s Municipal Comprehensive Review (Part 2): Major Transit Station Areas, Settlement Area Expansion, and Agricultural System” (Report No. SRPRS.20.004).

The Major Transit Station Area (“MTSA”) for Yonge Street and 16th Avenue Key Development Area (“16<sup>th</sup> KDA”) is identified as MTSA 38 – 16<sup>th</sup>-Carrville BRT Station within the Staff Report. We have reviewed the Staff Report and continue to request that the 16<sup>th</sup> KDA, and therefore MTSA 38, be expanded to include the Expansion Lands, as illustrated in **Attachment A** to this letter.

We have met with City Staff on multiple occasions to discuss this request and also appeared before Council at the May 10, 2017 Public Meeting as well as submitted written comments on the revised 16<sup>th</sup> KDA Secondary Plan on May 9, 2018 (see **Attachment B**).

In our opinion, the requested expansion to the existing 16<sup>th</sup> KDA (and MTSA 38) boundary continues to be warranted for the following reasons:

- The 2019 Growth Plan for the Greater Golden Horseshoe continues to provide increased intensification targets for the built-up area within municipalities. Key Development Areas, such as the 16<sup>th</sup> KDA are expected to accommodate the second highest levels of future growth within the Richmond Hill urban structure. The City should consider extending increased height and density permissions south along Yonge Street to capitalize on development-ready parcels that can accommodate increased intensification and contribute to future growth along the Yonge Street Regional Corridor.

- The Expansion Lands are well within the 500-metre radius of the 16<sup>th</sup> Avenue/Carrville Road and Yonge Street bus rapid transit stop. Previously, it was anticipated that the 16<sup>th</sup>-Carrville BRT Station (MTSA 38) would be required to meet a minimum of 160 people and jobs per hectare. Now, it is clear that York Region is seeking to increase the minimum target to 300 people and jobs per hectare. However, the boundary of MTSA 38 reflects the existing 16<sup>th</sup> KDA boundary, which does not extend to a 500m radius south of the transit stop.
- The Expansion Lands are a logical rounding out of the MTSA 38 and 16<sup>th</sup> KDA boundary and can provide appropriate transition of height and density to surrounding areas.
- Further, the Expansion Lands are the only lands within the 500-metre radius that are excluded from the MTSA 38 and 16<sup>th</sup> KDA boundary, that are not developed or considered stable residential lands.

To summarize, the Expansion Lands are a prime location to accommodate future growth in the form of intensification as it is located on a Regional Corridor, within a 500-metres to a bus rapid transit stop, and is a large development ready parcel. Therefore, in our opinion, the boundary of MTSA 38 should be expanded to include the Expansion Lands, similar to our request for the 16<sup>th</sup> KDA.

I will be in attendance at the February 26, 2020 meeting to speak to Council and answer any questions.

Should you have any additional questions or wish to discuss our comments in greater detail, please contact me at 905.513.0170.

Yours very truly,

**Malone Given Parsons Ltd.**

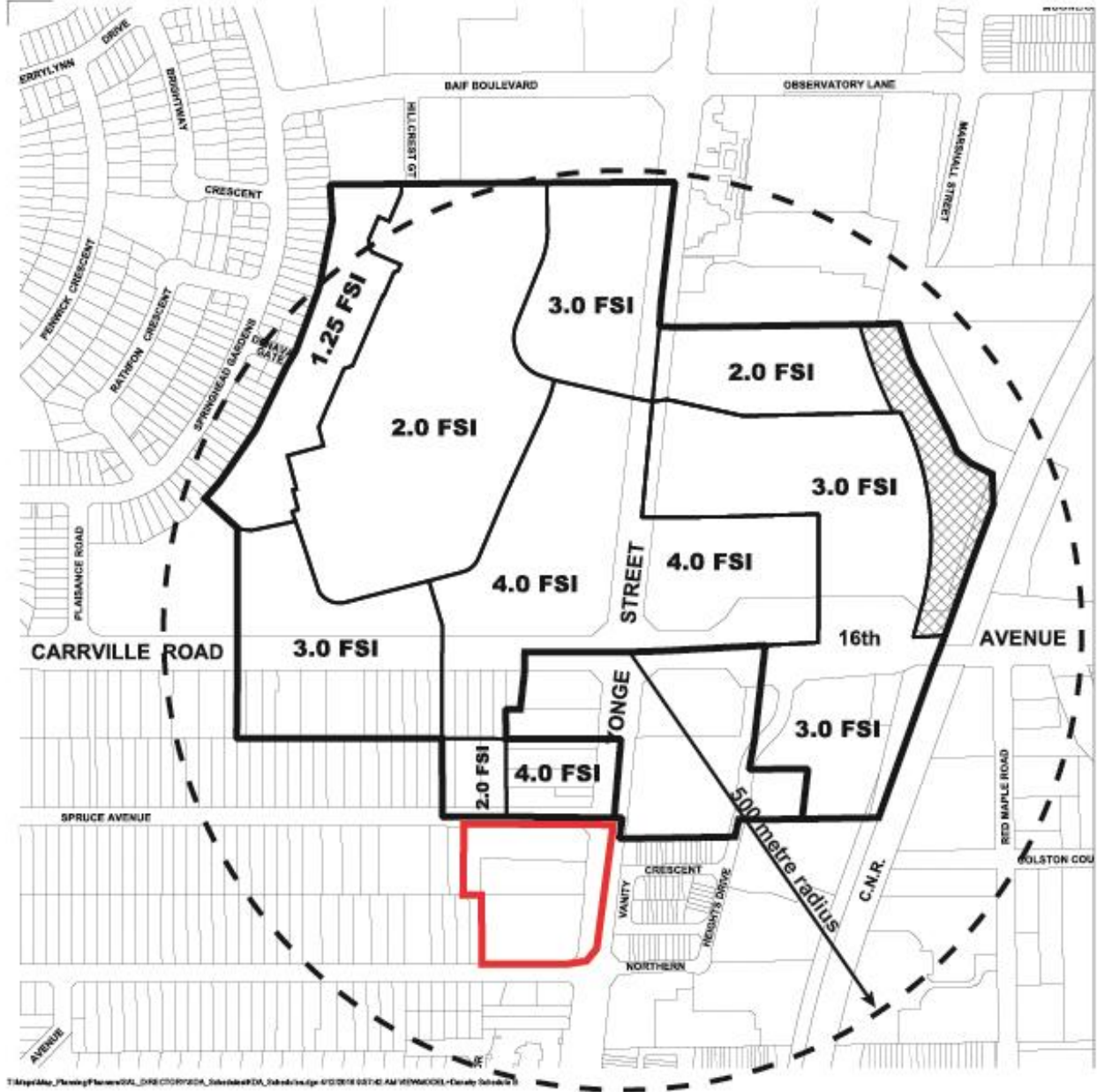


**Don Given, MCIP, RPP**

Attachments      A – Recommended Boundary Expansion to 16<sup>th</sup> KDA  
                          B – Letter re: 16<sup>th</sup> KDA Secondary Plan Boundary Expansion, dated May 9, 2019

cc.                    Brookvalley Management Inc.  
                          Mambro Tuzi  
                          Fineway Properties

Figure 1: Recommended Boundary Expansion to the 16<sup>th</sup> Key Development Area



-  Existing 16th KDA Boundary
-  Proposed KDA Boundary Expansion

Image Source: Town of Richmond Hill Draft Zoning 30-18, Schedule B

May 9, 2018

**Ms. Michelle Dobbie, MLA, MCIP, RPP**  
Senior Planner (Policy)  
Town of Richmond Hill  
Planning and Development Services  
225 East Beaver Creek Rd.  
Richmond Hill, ON, L4B 3P4

*MGP File: 17-2612*

Attn: Ms. Dobbie,

**RE: 16<sup>th</sup> Ave. and Yonge Street Key Development Area Secondary Plan – Request for Modifications and Boundary Expansion**  
**9144 Yonge Street, Richmond Hill, ON**

We are the planning consultants for Brookvalley Management Inc. (**Brookvalley**), the owner of 9144 Yonge Street (**Brookvalley Site**) located on the west side of Yonge Street, north of Oak Avenue. On behalf of Brookvalley, we have submitted previous correspondence to the Town (January 23, 2017, May 10, 2017 and June 16, 2017) and provided an oral delegation at the May 10, 2017 Public Meeting which requested that the Yonge Street and 16<sup>th</sup> Avenue Key Development Area (**16<sup>th</sup> KDA**) be expanded to include the Brookvalley Site and the adjacent lands to the north and that the Draft 16<sup>th</sup> KDA Secondary Plan be amended to conform to the Richmond Hill and York Region Official Plans.

After a detailed review of the April 2018 Draft Yonge and Carville/16<sup>th</sup> Key Development Area Secondary Plan, we continue to request that the 16<sup>th</sup> KDA be expanded to include the Brookvalley Site and the adjacent lands to the north for the following reasons:

- **The 2017 Growth Plan increases intensification targets for the built-up area within municipalities. The increased growth associated with the intensification targets provides the Town with an opportunity to be more aggressive in their height and density targets in key locations of the Town which are intended to accommodate higher amounts of growth, i.e. Key Development Areas;**
- **The current density of the 500-metre radius surrounding the transit stop at 16<sup>th</sup> Avenue/Carville Road and Yonge Street does not meet the minimum requirements of the Major Transit Station Area (MTSA) policies of the 2017 Growth Plan.**
- **The long-term horizon for the redevelopment of the Hillcrest Mall site could affect the 16<sup>th</sup> KDA's ability to provide near-term intensification opportunities in close proximity to higher order transit. The inclusion of the Brookvalley Site within the KDA could help to alleviate the near-term density pressures on the KDA and maximize the number of transit riders as per the MTSA policies of the Growth Plan.**

- The inclusion of the Brookvalley Site within the 16<sup>th</sup> KDA would allow for a proper transition of height and density from the 29 -storey development at the intersection of Carville Road and Yonge Street to the Regional Mixed-Use Corridor designated lands to the south of the Brookvalley Site;
- The Brookvalley Site is a logical location to accommodate increased height and density due to its frontage on Yonge St. and its proximity to current and future higher order transit (i.e. existing BRT and potential future subway extension)

For all these reasons, we are requesting that the Town **include the Brookvalley Site in the 16<sup>th</sup> KDA and permit a minimum height of 20 storeys and a minimum density of 4.0 FSI on the Brookvalley lands.**

Figure 1: Recommended Boundary Expansion to the 16<sup>th</sup> Key Development Area

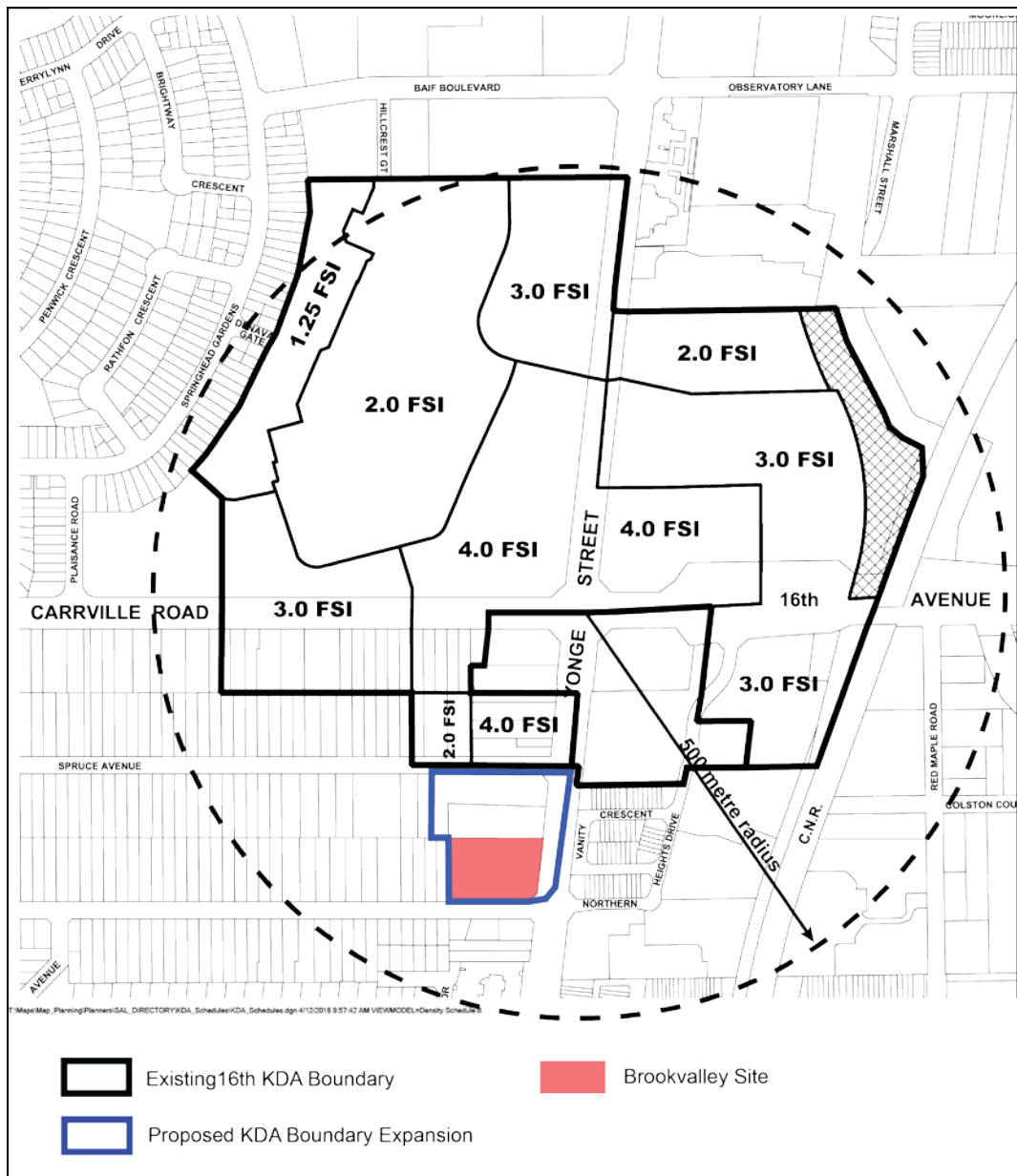


Image Source: Town of Richmond Hill Draft Zoning 30-18, Schedule B

**The increased intensification targets from the 2017 Growth Plan provides the Town with an opportunity to be more aggressive in the height and density permissions for the 16<sup>th</sup> KDA**

The 2017 Growth Plan for the Greater Golden Horseshoe significantly changes how municipalities will plan for future growth and development. In particular, the increase in the intensification targets from 40% to 60% (Section 2.2.2.1) will have large implications on how the 16<sup>th</sup> KDA Secondary Plan area should be planned to accommodate future growth. Outside of the Urban Growth Centre, Key Development Areas are expected to accommodate the second highest levels of future growth due to their ideal locations and access to transit services. As such, the 16<sup>th</sup> KDA would be expected to accommodate its fair share of future growth associated with the higher intensification targets.

It is our opinion that the increase in intensification targets for municipalities provides the opportunity for the Town to re-evaluate and increase the height and density permissions within the 16<sup>th</sup> KDA Secondary Plan, including the height and density permissions for the Brookvalley Site. It is noted that since the last draft Secondary Plan, the height and density permissions along the north side of 16<sup>th</sup> Avenue, east of Yonge St., have increased to a maximum height of 20 storeys and a density of 4.0 FSI. Similarly, these increased height and density permissions were extended north along Yonge St., on the Hillcrest Mall lands. It is our opinion that these same permissions should be extended south along Yonge Street through a boundary expansion of the 16<sup>th</sup> KDA to the Brookvalley Site to capitalize on a development ready parcel that will help accommodate the expected increased intensification on a Regional Corridor that has been planned to accommodate future growth.

As a key area to accommodate future population and employment growth within the Town, increasing the height and density permissions at this point in the Secondary Plan process would allow the Town to be ahead of the curve with respect to growth target implementation and would allow the Town to avoid a future amendment process to comply with the new growth targets.

**The existing density of the 500-metre radius around the transit stop at 16<sup>th</sup> Avenue/Carville Road and Yonge Street does not conform with the Major Transit Station Area policies of the Growth Plan which required conformity upon coming into force and effect**

The MTSA policies in the 2017 Growth Plan came into force and effect on July 1, 2017 and would immediately apply to the Brookvalley Site. Unlike the intensification and Greenfield density policies of the Growth Plan, the policies for MTSA's do not include transition provisions. As such, it is our interpretation that to conform to the Growth Plan policies, the MTSA surrounding the 16<sup>th</sup> Avenue/Carville Road and Yonge Street transit stop would presently need to meet the minimum target as the policies of the Growth Plan are in force and effect. Based on the current Bus Rapid Transit (BRT) system that runs along Yonge Street, the 16<sup>th</sup> Avenue/Yonge Street MTSA would be required to achieve a minimum of 160 people and jobs per hectare. Should the anticipated subway extension reach 16<sup>th</sup> Avenue, the MTSA would be required to achieve a minimum of 200 people and jobs per hectare, which the policies of the draft Secondary Plan protect for.

Utilizing 2016 Census data, GIS measurements of retail/commercial space, and the Persons Per Unit (PPU) & Square feet per employee assumptions from the 2014 Richmond Hill Development Charges Background Study, MGP estimates that the existing density of the 16<sup>th</sup> Avenue/Yonge Street MTSA is 114 people and jobs per hectare.

*Table 1: Estimate of Existing Density of the 16<sup>th</sup> Avenue/Yonge Street MTSA*

<b>Population</b>			
	<b>Count</b>	<b>PPU <sup>1)</sup></b>	<b>Population</b>
Singles	93	3.67	341
Apartments	2271	1.95	4,428
Other	325	2.98	969
<b>Total</b>	<b>2689</b>		<b>5,738</b>
<b>Employment</b>			
	<b>Sq.ft.</b>	<b>Rate <sup>2)</sup></b>	<b>Sq.ft./Employee</b>
Retail	1,271,476	475	2,677
Office	65,649	360	182
Institutional	4,672	700	7
<b>Total</b>	<b>1,341,797</b>		<b>2,866</b>
<b>People + Jobs per Hectare</b>			<b>114.4</b>

1) Persons Per Unit (PPU) based on 2014 Richmond Hill Development Charges Background Study

2) Sq.ft. per employee rates based on 2014 Richmond Hill Development Charges Background Study

The Brookvalley Site is within the 500-metre radius of the transit station and is anticipated to be included in the MTSA once it is defined by the Town. The increased height and density permissions associated with the inclusion of the Brookvalley Site in the 16<sup>th</sup> KDA would assist the 16th Avenue/Yonge Street MTSA in achieving the minimum required density of 160 people and jobs/ha, and the anticipated increase to 200 people and jobs/ha with the extension of the subway. An increase in the height and density permissions associated with the inclusion of the Brookvalley Site in the 16<sup>th</sup> KDA would also satisfy Section 2.2.4.1 of the Growth Plan which states that planning in an MTSA should maximize the number of potential transit users within walking distance of potential stops (Section 2.2.4.1 of the Growth Plan).

**The long-term development horizon of Hillcrest Mall could affect the 16th KDA's ability to provide near-term intensification opportunities in close proximity to higher order transit**

We understand that the development horizon for the Hillcrest Mall site is potentially beyond the planning horizon of the provincial legislation. At approximately 40% of the overall 16th KDA area, the long-term development horizon for the Hillcrest Mall site has the potential to impact the ability of the 16<sup>th</sup> KDA to achieve the MTSA densities as per the Growth Plan.

The expansion of the KDA boundary, and the associated increases in height and density on the Brookvalley Site, would help to alleviate those pressures by providing near term accommodation of growth and intensification that would help the Town to meet their Growth Plan targets, but also provide

transit supportive densities that would maximize the number of users within an MTSA. Brookvalley has indicated that there is potential for the development of their site within a minimum of 5 years, so the ability for near term benefit is a reality.

### **The inclusion of the Brookvalley Site within the 16th KDA would allow for a proper transition of height and density between areas**

The recent OMB decision for 9218 Yonge St. to permit a 29 and 24 storey high rise development at the southwest corner of Carville Road and Yonge Street has affected the height and density required to provide sufficient transition from the 16<sup>th</sup> KDA to the Regional Mixed-Use Corridor designated lands to the south. Current permissions for the Regional Mixed-Use Corridor designation permit a maximum of 15 storeys in heights and 2.5 FSI in density. The lands to the north of Spruce Ave. along Yonge Street within the 16<sup>th</sup> KDA permit a height of 20 storeys and a maximum density of 3.0. In order to permit a sufficient transition, the Brookvalley Site and the adjacent lands to the north should have increased height and density permissions to ease the transition to the surrounding designations.

### **The locational attributes of the Brookvalley Site merit an expansion of the 16th KDA to include the lands**

The Brookvalley Site is a large, development ready parcel that can provide intensification in a key area for growth in the Town. The location of the Brookvalley Site on a Regional Corridor and its proximity to current bus transit services makes the site a logical spot to accommodate intensification and higher levels of density within the Built-up Area. The proximity to current and future transit services make the Brookvalley Site a prime location to accommodate future growth and warrants its inclusion within the 16<sup>th</sup> KDA to fully realize the development potential of the site.

In addition to its proximity to transit services, the Brookvalley site is provided with ideal access along the eastern (Yonge St.), western (identified potential new street), and southern (Oak Ave.) boundaries of the site. The potential park/open space (Spruce Avenue Park) to the west of the site would provide the Brookvalley Site with nearby amenity space and could provide a sufficient buffer and transition to the existing neighborhood to the west.

Based on the strong locational attributes that the Brookvalley Site possesses, we believe that the property should be included in the 16<sup>th</sup> KDA based on its access, development readiness, proximity to transit, and ability to integrate into the existing community.



## Conclusion

Based on the above commentary, we request that the Town **include the Brookvalley Site in the 16th KDA and permit a minimum height of 20 storeys and a minimum density of 4.0 FSI on the Brookvalley lands.** We are aware that the owner of one of the adjacent lands to the north is seeking similar permissions.

We look forward to further input and dialogue as part of the 16th KDA Secondary Plan process and request that we be notified of any reports, meeting or other items relating to the process. **We would like to request a meeting with you and staff to discuss our comments in detail. A follow up email will be sent shortly to discuss the best times for all parties to meet.**

If you have any questions or concerns, please do not hesitate to contact me.

Yours very truly,

**MALONE GIVEN PARSONS LTD.**



Don Given, MCIP, RPP  
President  
[dgiven@mgp.ca](mailto:dgiven@mgp.ca)