

December 7, 2021

MGP File: 15-2437

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

via email: clerks@richmondhill.ca & opupdate@richmondhill.ca

Dear Acting Mayor and Members of Richmond Hill Council:

**RE: Key Directions Report
East Beaver Creek Road and Highway 7
Parkway Hotels and Convention Centre Inc.**

Malone Given Parsons Ltd. (“MGP”) is the planning consultant to Parkway Hotels and Convention Centre Inc. (“Sheraton”), who own approximately 8.61 hectares of land located at the northeast corner of Highway 7 and Leslie Street (“Sheraton Lands”), within the City of Richmond Hill.

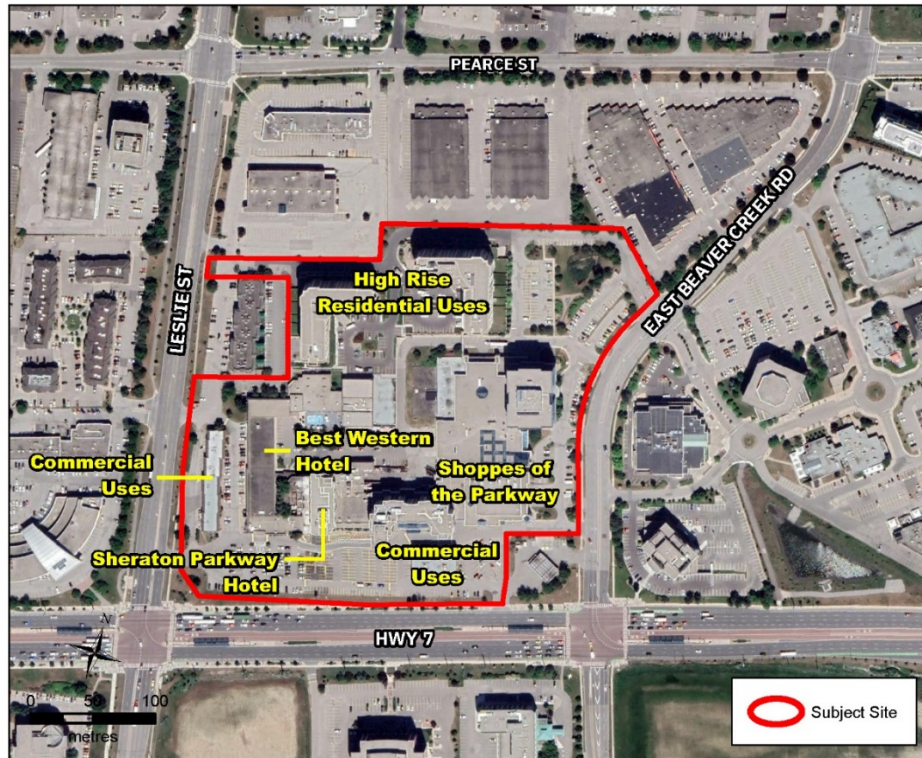
We have reviewed the Key Directions Report for the Richmond Hill Official Plan Update dated November 2021 (the “Report”) and are writing to provide input on the policy direction for the East Beaver Creek Road and Highway 7 area (“EBC/Hwy 7 area”), which includes the Sheraton Lands.

We generally support the area-specific key directions for the EBC/Hwy 7 area, which recognizes the approved employment conversion and acknowledges the highly mixed-use functions that currently exist. However, it is our preference that the EBC/Hwy 7 area be identified as a Key Development Area rather than a Local Centre. Alternatively, we ask that should the Sheraton Lands remain a Local Centre, that Staff clarify that the planned Local Centre designation will permit the envisioned heights and densities for the Sheraton Lands.

The Sheraton Lands and its Future Vision

The Sheraton Lands offer an opportunity to locate increased density and a mix of uses adjacent to existing rapid transit. Today, the Sheraton Lands already include a range and mix of uses including high-rise residential, the Sheraton Parkway Hotel and convention centre, Shoppes of Parkway, Best Western Hotel, and commercial uses (see Figure below).

Figure 1 Sheraton Lands



Source: Google Earth, Malone Given Parsons Ltd (2021)

Sheraton's ultimate vision for the quadrant is to regenerate the area by strengthening the existing mixed commercial-residential complex on the lands. The vision is to replace the Best Western Hotel and commercial uses with a larger, full-service prestige hotel with expanded convention and banquet facilities, which will create one of the largest convention Centers in York Region along. To support the financing of this, new high-rise residential development, commercial and office space is also planned to ensure that the lands continue to develop as a mixed-use community along with community facilities such as a strata park to support future and existing residents of the area.

The planned heights and densities for the Sheraton site are generally upwards of 35 storeys and with a density of approximately 6.0 Floor Space Index.

The Sheraton Lands are planned as a Local Centre however, the City's current intensification framework emphasizes more intensified heights and densities in the KDAs over Local Centres.

The City's current Official Plan establishes an intensification framework which directs the highest and densest developments to Richmond Hill Centre. Second in the intensification hierarchy, are Key Development Areas ("KDAs") followed by Regional Corridors and Local Centres. The City's current intensification framework places a greater emphasis on achieving more intensified heights and densities in the KDAs over Local Centres.

In our meeting with City Staff on December 6th, Staff advised that the Key Directions Report strives to move away from this intensification hierarchy interpretation. More importantly, the Sheraton and EBC/Hwy 7 areas inclusion in a Local Centre is not intended to infer that the planned heights and densities will be less in a Local Centre when compared to a KDA. Rather, Local Centers are intended to differ from KDAs in terms of prescribing the City's priorities for areas of the City to develop.

This Staff perspective shared at our meeting represents a departure from the current Richmond Hill Official Plan ("RHOP") framework and is not clearly articulated in the City's Key Direction Report.

Despite the Sheraton Lands being identified as part of a Local Centre in the Report, we are seeking confirmation that the Local Centre designation will not affect Sheraton's ability to achieve its planned redevelopment with building heights up to 35 storeys and a density of 6.0 Floor Space Index. In the City's current framework, these are heights and densities are typically reserved for KDA's.

Lastly, and perhaps most importantly, the EBC/Hwy 7 area as a whole, including the Sheraton Lands, is more appropriately characterized as a KDA for the reasons described in detail in the following sections.

The Sheraton Lands and East Beaver Creek Road/Highway 7 Area are better characterized as a KDA.

The Key Directions Report describes the EBC/Hwy 7 area as an "emerging Local Centre" rather than a KDA. In the Report, Staff note that KDAs represent large swaths of lands presently occupied by low intensity uses and expansive parking lots, and more importantly, are serviced by BRT.

Local Centres continue to be shown below KDAs in the intensification hierarchy, with a similar regional draw; however, Local Centres require *"more contextually sensitive policy direction to ensure their unique character and local conditions are addressed over the long-term"* (Key Directions Report Section 2.3.2.1).

This is consistent with the existing RHOP, which states that *"Local Centres will accommodate intensification at a scale and intensity that is less than the KDAs and generally less than the abutting areas of the Regional Corridor"* (Policy 3.1.3.11, emphasis ours). In our opinion, a Local Centre, as described, does not accurately reflect the magnitude of redevelopment and intensification that the EBC/Hwy 7 area has potential to accommodate.

The existing and unique mixed of uses and large land parcel ownerships within the area provides an opportunity for significant redevelopment.

In addition, the EBC/Hwy 7 area has the benefit of two planned MTSA's (being in the Leslie-Highway 7 BRT Station MTSA and the East Beaver Creek BRT Station MTSA) surrounding the existing BRT Stations immediately adjacent to the Sheraton Lands, both of which have a planned minimum density target of 200 people and jobs per hectare.

The EBC/Hwy 7 area is a clear node along the Highway 7 Regional Corridor, serviced by rapid transit, with the ability to accommodate greater heights and densities. Like other KDAs within the City, there are opportunities that should be unlocked in the EBC/Hwy 7 by elevating this area to a KDA status.

The Framework for the East Beaver Creek Road/Highway 7 Area should continue to mandate a mix of uses rather than emphasize employment uses.

We agree with Staff that the EBC/Hwy 7 area is one of the most complete communities in the City where residents can both live and work as well as access retail and restaurants. These mixed-use characteristics formed the basis for the employment conversion request which was approved as by York Region as part of their municipal comprehensive review.

As previously noted in the February 26, 2020 Staff Report to City of Richmond Hill Council, the EBC/Hwy 7 area could be redesignated to a mixed-use designation that would *"recognize the existing employment and high-density residential uses in the area and allow for a range and mix of land uses in a compact, pedestrian-friendly and transit-oriented built-form to be supported by the existing bus rapid transit along Highway 7"*. This statement is maintained in the Key Directions Report.

However, section 2.3.3.3.1 of the Key Directions Report states that a key direction for the EBC/Hwy 7 area is to “*convert from Employment designations to support a mix of uses, with the area predominantly continuing to support employment uses*” (emphasis ours).

In our opinion, the Report prescribes a change in direction for the EBC/Hwy 7 area in comparison to the principles set out in February 2020 for the employment conversion.

As detailed planning policies for the EBC/Hwy 7 area are developed to accommodate a wider variety of land uses, employment uses should not remain as the primary land use for the area. The EBC/Hwy 7 area is already an existing complete community since there are both employment and high-density residential uses in the area. Focusing on employment land uses in the EBC/Hwy 7 area would not be an appropriate reflection of the range of uses that occupy the lands today or mixed-use vision for the future.

One of the City’s considerations in transitioning the EBC/Hwy 7 area from an employment designation to a mixed-use designation is the scale and intensity of mixed use that would be appropriate in the area (Key Directions Report Section 2.3.3.3.2). The City will aim to ensure that new uses are a good fit for the area and do not significantly destabilize the existing employment uses in the surrounding area. With over 630 existing residential units in the EBC/Hwy 7 area, Staff have noted the success of this area as a complete community, notwithstanding the lack of community services.

It is clear that high density residential uses have existed in the EBC/Hwy 7 area for years without any adverse impact or destabilizing the surrounding employment uses in the area. Therefore, it is our opinion that the Sheraton lands can accommodate additional residential development without having an adverse impact on the surrounding employment uses. As such, there is no need to prescribe employment uses the predominant future land use of the EBC/Hwy 7 area.

Conclusion

We thank Staff for meeting with us on December 6 to discuss our comments on the Report and the preliminary plans for the Sheraton Lands.

Despite Staff’s perspective that there is no difference between a Local Centre and KDA in terms of the scale of development, we continue to believe that the EBC/Hwy 7 area should be identified as a Key Development Area rather than a Local Centre. Alternatively, we ask that Staff provide clarification that the planned Local Centre designation will permit the envisioned heights and densities for the Sheraton Lands.

We look forward to continuing to engage with Staff through the Official Plan Update process and future development applications for the Sheraton Lands.

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

Yours very truly,

Malone Given Parsons Ltd.



Lauren Capilongo, MCIP, RPP
Principal

cc: Jason Kaptyn, Kaptyn Realty
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