



Ramsay Planning Inc.

(Email Only)

December 7, 2021

Members of City Council
City of Richmond Hill
225 East Beaver Creek Road
Richmond Hill, ON
L4B 3P4

Dear Members of Council:

**RE: Key Directions Report, For the Richmond Hill Official Plan Update
Our File No. 2114**

We are planning consultants retained by the owners of 32, 42, 66, 74 and 76 Major Mackenzie Drive West (the "Neighbourhood Group") with respect to the potential redevelopment of lands on the north side of Major Mackenzie Drive, west of Yonge Street (the "Redevelopment Area"). The Neighbourhood Group is comprised of the owners of five of the eight privately held lots in the Redevelopment Area.

The Redevelopment Area is located within the Local Downtown Centre under the current Richmond Hill Official Plan and is also identified in the recently released draft Region of York Official Plan, November, 2021 as being part of proposed Major Transit Station Area #49 known as the Major Mackenzie BRT Station.

Our clients requested that we submit the following comments on their behalf in response to the Key Directions Report, For the Richmond Hill Official Plan Update, November, 2021:

- 1) Key Directions – 2.1 Urban Structure/2.1.2.1 Urban Structure Directions (p. 8): We support the direction to align the regional Major Transit Station Area within the urban structure and to recognize Major Transit Station Areas within the City's intensification strategy.
- 2) Key Directions – 2.3 Intensification (p. 36): We agree that the "...objective of planning MTSA's is to capitalize on the number of potential transit users that are within walking distance to a transit station (approximately 500-800 metre walking distance)" and that "...a key policy objective of MTSA's therefore involves the achievement of a minimum density target, which is prescribed by Provincial policy, and reflective of the type of transit that is planned to serve the MTSA". However, we believe it is equally important to establish objectives that encourage and support higher densities than the minimum density targets, where appropriate.

- 3) Key Directions – 2.3 Intensification/2.3.2.1 Intensification Hierarchy (pp. 38-39): We support the initiative to clarify the purpose and intent of the intensification hierarchy. In particular we believe the intensification hierarchy should explicitly reference MTSA's. At present it appears that some MTSA's are considered at different levels in the intensification hierarchy.
- 4) Key Directions – 2.3 Intensification/2.3.2.1 Intensification Hierarchy (pp. 41-42): We support the direction to "appropriately designate intensification areas and implement Regional MTSA minimum density direction" and note that Table 2.3-1 lists the minimum density target for the Local Centre-the Village at 160 residents and jobs per hectare. However we don't agree that the boundaries of the MTSA's should not be considered as land use boundaries, but simply as catchment areas for transit stations. In our view MTSA's should have clear and precise boundaries as a land use designation or as an overlay on a land use schedule. In doing so this would provide clarity to land owners and residents about the location where more intense development is contemplated. Ambiguity with the boundaries will undoubtedly lead to disputes, unnecessary planning applications, appeals and overall uncertainty for land owners and residents.
- 5) Key Directions – 2.3 Intensification/2.3.2.1 Intensification Hierarchy (p. 42): The report indicates that "...the refinement of the Centres and Corridors in terms of delineated boundaries, proposed height, densities and mix of use, as well as public realm and infrastructure needs will be further explored in Phase 3 of the Official Plan Update". We would appreciate understanding how the refinement of boundaries, determination of heights, densities, etc. will be determined and what opportunities will be provided for public and landowner engagement.
- 6) Key Directions – 2.3 Intensification//Table 2.3-1 Summary of Intensification Hierarchy, Land Use Designations, and Alignment With Regional MTSA Minimum Density Targets (p. 44): Table 2.3-1 establishes the minimum density targets for the various land use designations in the intensification hierarchy. The densities are based on the targets proposed in the draft York of Region Official Plan for MTSA's and are expressed as "residents + jobs per hectare". We believe the Directions Reports should clarify how density is defined and how it will be applied. It is our understanding that the minimum density target is to be achieved over the entirety of the area and not on a development block basis.
- 7) Key Directions – 2.3.3.5 The Village Local Centre/2.3.3.5.1 The Village Local Centre Key Directions (p. 69): The Key Directions for the Village Local Directions address:
 - Reduce the Downtown Local Centre to lands only in what is presently called the Village District in the current Official Plan, and redesignate this area as "the Village Local Centre";
 - Plan for this area to be vibrant and locally and regionally attractive as a dining, shopping, cultural, and entertainment hub;

- Celebrate the historic character and support the arts and culture of the area through façade improvement and building renovation, along with redevelopment of sites that are complementary and contextually sensitive to the area overall;
- Apply urban design principles to determine height and density that support revitalization and the vision for this area by considering “human scaled” podiums/building heights;
- Explore opportunities for widening sidewalks, creating new cycling facilities and pedestrian paths.

In our opinion the key directions do not address the important issue of how the MTSAs, which implies a more intense form of development that what is currently found in the area, will be integrated within the Village Local Centre. The key Directions should explicitly acknowledge that the achievement of the minimum density target (i.e. 160 people and jobs per hectare) will require more intense forms of development that what is currently found in the area. Reference to terms like “complementary and contextually sensitive” and “human scaled podiums and building heights” misrepresent the importance that the Province and the Region place on the development of MTSAs and could be misinterpreted to mean new development will be generally similar to existing development found in the area.

- 8) Key Directions – 2.3.3.5 The Village Local Centre/2.3.3.5.2 The Village Local Centre Key Directions Rationale (p. 72): We agree with the statement that the maximum 5 storey height and 2.0 FSI in the current official plan are “blunt tools in a very complicated context” and support the Key Direction to “Apply urban design principles in the determination of appropriate height and density that supports revitalization”. Careful consideration is required to ensure the criteria-based or qualitative approach to urban design is consistent with the objectives associated with the identification of the area as a MTSA.

- 9) Key Directions – 2.3.3.5 The Village Local Centre/2.3.3.5.1 The Village Local Centre Key Directions Rationale (p. 73): The suggested Vision Statement for the Village Local Centre is:

“A Village within the City” that is vibrant, walkable and green; and that provides opportunities for entertainment and access to the City’s history.”

In our opinion the above vision statement should also address how new, more intense forms of development will be harmoniously integrated into the existing low density, historical and cultural assets of the area.

- 10) Key Directions – 2.3.3.5 The Village Local Centre/Figure 2.316 Village Study Area (p. 68): Please clarify that our client’s lands are within the Village District Study Area. As well, we request that Figure 2.3.16 should be revised as it erroneously shows

Elizabeth Street extending across our client's lands. It is our understanding that the current Official Plan does not show the Elizabeth St. extension as a proposed public right-of-way.

- 11) Next Steps – 3.4.3.1 OPA18.# - Major Transit Station Areas/3.4.3.3 OPA Village (p. 129): The Official Plan Update is intended to be implemented through a series of Official Plan Amendments rather than through a single comprehensive Amendment. According to the proposed schedule Official Plan Amendments dealing with Major Transit Station Areas and the Village Local Centre will be initiated in early/mid 2023 following the approval of the Regional Official Plan. We would appreciate understanding how privately initiated, site specific amendments within the MTSA's and the Village Local will be considered and evaluated in the meantime. It's our understanding that privately initiated, site specific amendments within MTSA's can be considered prior to the approval of the Region of York comprehensive Official Plan Review.

We respectfully request that the above comments be addressed prior to the Council's finalization of the Key Directions Report.

Thank you for the opportunity to provide comments on the Key Directions Report.

Yours truly,



Allan Ramsay, MCIP, RPP
Principal,
Allan Ramsay Planning Associates Inc.