

December 7, 2021

MGP File: 21-2988

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

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

Dear Acting Mayor and Members of Richmond Hill Council:

**RE: Richmond Hill Official Plan Update – Key Directions Report  
Block 51, Plan 65M4668  
Comments from Leslie Elgin Developments Inc.**

Malone Given Parsons Ltd (“MGP”) are the Land Use Planners for Leslie Elgin Developments Inc. (“Leslie Elgin”), owner of a 0.94 ha parcel located east of Leslie Street, north of John Birchall Road and legally known as Block 51, Plan 65M4668 (“Subject Lands”).

On behalf of Leslie Elgin, we have reviewed the Key Directions Report for the Richmond Hill Official Plan Updated dated November 2021, as well as the Emerging Key Directions materials presented to the public at the October 14, 2021, open house.

We would like to thank City staff for taking the time to meet with us on November 1, 2021, to discuss Leslie Elgin’s vision for the Subject Lands.

Following that meeting, we are respectfully requesting that the City identify the emerging node at Leslie Street and John Birchall Road as an Intensification Area, in recognition of the existing as-of-right high-density permissions and the node’s complete community characteristics. Additionally, we are requesting that the City update the height and density permissions in Medium/High Density Residential designations to better reflect current standards for such development.

The remainder of this letter provides a brief site and policy background and justification to the above request.

### **Site Context**

The Subject Lands are located within the North Leslie area of the City at the northeast corner of Leslie Street and John Birchall Road, Surrounding land uses around the intersection of Leslie Street and Elgin Mills Road East include the following:

**Northwest corner:**

- Richmond Green Sports Centre and Park
- Richmond Green Secondary School
- Richmond Green Public Library

**Southwest corner:**

- Gas station
- Small retail centre (CIBC branch, coffee shops, medical clinic, etc.)
- Low density residential subdivision

**Northeast corner:**

- Large commercial, service, and office plaza with surface parking (Home Depot, Costco, TD Bank, PetSmart, Michaels, Mark's)

**Southeast corner:**

- Elgin Mills Cemetery, Cremation and Funeral Centres

The Subject Lands and surrounding area are shown on Figure 1 below. The Subject Lands are within walking/biking distance to the above-identified recreational, service, and retail amenities.

*Figure 1 Aerial Map of Subject Lands and Surrounding Area*



Source: Google Earth (2018), Malone Given Parsons Ltd (2021)

The clustering of these employment, commercial, institutional, recreational and residential uses within this area of the North Leslie Secondary Plan ("NLSP") and adjacent lands to the south creates a vibrant urban node that, in our opinion, should be intensified and optimized.

## Road and Transit Network

The Subject Lands and surrounding area are well serviced by existing transit infrastructure, with multiple York Region Transit ("YRT") bus routes with bus stops within a 500m walking

distance radius and a bus terminus at the Richmond Green Library on the west side of Leslie Street. Along Leslie Street, there are three bus routes that service the Subject Lands – Route 82 Valleymede, Route 83A Trench, and Route 90 Leslie. The 82 Valleymede bus route traverses through local residential subdivisions generally between Leslie Street and Bayview Avenue and loops around at Commerce Valley Drive E, south of Highway 7. The 83A Trench bus route connects riders to Richmond Hill Centre Station. The 90 Leslie bus route travels along Leslie Street towards Don Mills Station. Richmond Green Library is the northern terminus for all three bus routes.

Leslie Street north of Major Mackenzie Drive, including the frontage of the Subject Lands, is identified as a Regional Transit Priority Network on Map 11, Transit Network of the Regional Official Plan.

We recognize that the Region of York has initiated its Municipal Comprehensive Review to update its Regional Official Plan (“ROP”). In the latest draft of the ROP released on November 11, 2021 and revised on November 25, 2021, the Region has removed the Regional Transit Priority Network designation along the portion of Leslie Street fronting the Subject Lands. We disagree with this direction as we see the medium/high density permissions and employment designations that surround the Leslie Street corridor in this part of the City would benefit and support the inclusion of higher-order transit.

The Provincial Planning Statement, 2020 requires planning authorities to identify appropriate locations and promote opportunities for transit-supportive development. In our opinion, the removal of the Regional Transit Priority Network designation on Leslie is counter to the principles of developing transit-oriented communities. In addition, this area should be a Regional Transit Priority as Richmond Green is a destination and a regional park with a regional draw, and therefore should be easily accessible. This change is a missed opportunity to provide and reinforce a transit-supportive and complete community, which the City and Region should be a supportive of. We are working with the Region through their MCR process towards recognizing the potential for a Rapid Transit Corridor designation on Leslie Street north of Major Mackenzie Drive.

Leslie Street and Elgin Mills Road are identified as Arterial Roads in the City’s Official Plan, while John Birchall Road is identified as a Major Collector Road under the North Leslie Secondary Plan. In accordance with Secondary Plan Policies 9.4.6 and 9.6.2.3, higher intensity, mixed use developments shall be located on arterial roads, major collector roads or minor collector roads to serve the community and support public transit. This is the only area in the NLSP with an intersection of a Major Collector Road with the arterial Leslie Street, making it an appropriate location for intensification.

### **Leslie Street and John Birchall Road – Emerging Node**

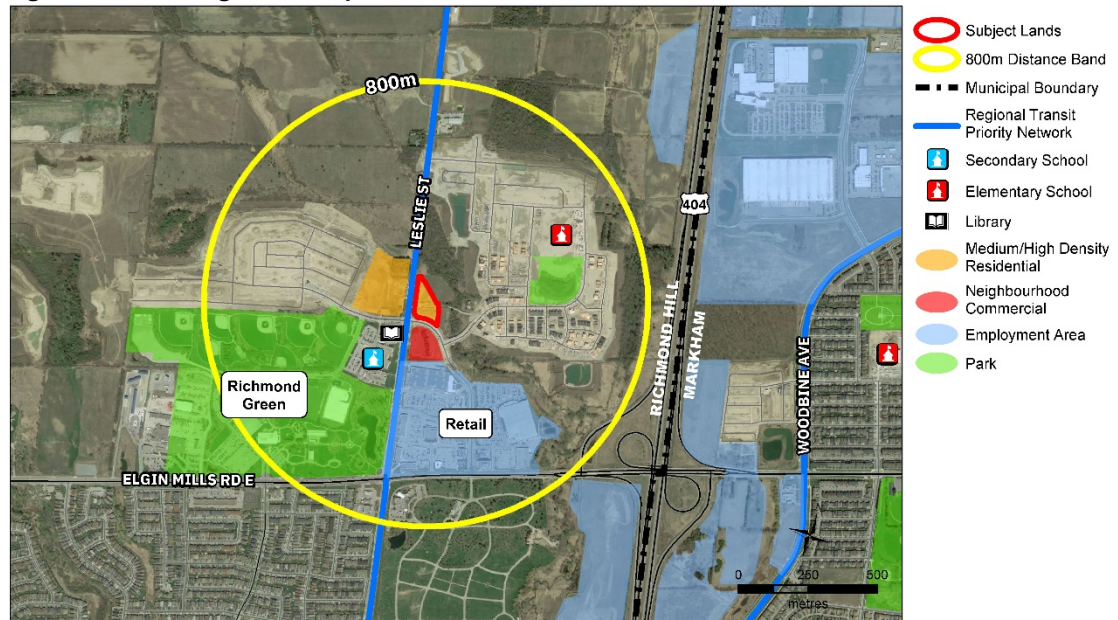
Through the clustering and mix of commercial and medium/high density land uses, the North Leslie Secondary Plan has established a clear nodal vision at the intersection of Leslie Street and John Birchall Road. The NLSP, through its land use designation policies, establishes a framework that facilitates a compact, mixed-use community.

The below provides a brief analysis of the strengths of the area that make it an ideal location for an emerging node and the opportunities to further enhance it as an Intensification Area.

### Strengths

- **15-Minute Community:** The variety of land uses within walking/biking distance creates a compact community where current and future residents have easy access to the day-to-day amenities that they require. The site has ready access to a variety of land uses including:
  - **Parks/Open Space/Green Space** – Richmond Green; Richlands Park; Natura Heritage System; Elgin Mills Cemetery
  - **Institutional** – Richmond Green Library
  - **Recreational** – Tom Graham Arena; Richmond Green Sports Centre; Richmond Green Skate Trail
  - **Schools** – Richmond Green Secondary School; Future Elementary School Site (east within Richlands community)
  - **Retail and Service Commercial** – Home Depot; Costco; Michaels; Staples; PetSmart; Orangetheory Fitness; The Brick; TD Bank; Scotiabank
  - **Restaurants** – Pi Co; Freshii; Astoria; Popeyes
  - **Employment** – Elgin Mills Professional Centre; Barker Business Park; 404 North Business Park (Markham); Cathedral Business Park (Markham)
- **Land Use Designation:** The Subject Lands and the lands immediately to the west are already designated for medium/high-density residential uses. This designation is appropriate as they are the centre of the node. Both sites are vacant and can construct immediately subject to approvals.

Figure 2 Surrounding Community



### Opportunities

- **Retail Plaza Intensification:** The northeast corner of Leslie Street and Elgin Mills Road is currently operating as a typical suburban large-format retail plaza. It serves an essential function to the community providing convenient access to goods, services, and employment. However, the intended function of these lands is for a “high density employment uses permitting a maximum height of 10 storeys for major office, office and hotels, and a maximum height of 5 storeys for all other development (Section 4.8.1.1.7 of the City’s OP).

The built-form in this area consists of single-storey retail stores, an expanse of surface parking and a professional office building. There is an opportunity for these lands to intensify while continuing to provide the community with everyday amenities.

- **Neighbourhood Commercial Intensification:** The lands immediately south of the Subject Lands is designated Neighbourhood Commercial in the NLSP. This designation permits both commercial uses and medium/high-density residential uses.

There is an opportunity here to provide a high-density mixed-use building that complements the density of the Subject Lands while fitting into the intensifying retail plaza to the south.

The walkability/bikeability of this area eliminates many of the single-purpose auto trips required in a less complete community. It remains our opinion that this emerging node is an ideal location for higher-order transit, but we believe it should be recognized as an intensification area, regardless, due to the strengths and opportunities listed above.

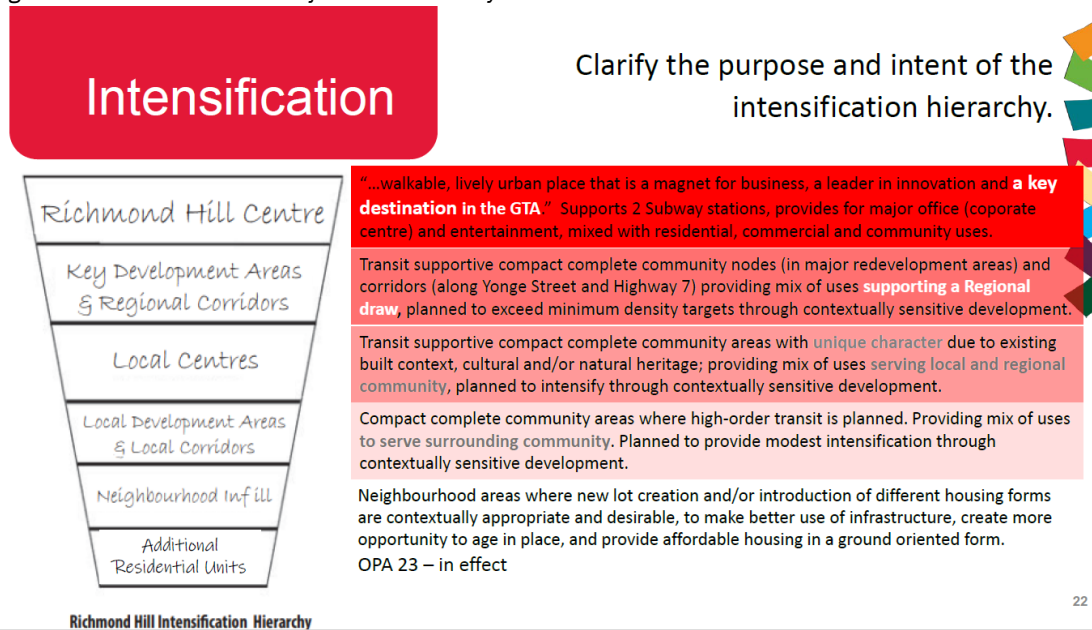
The constraint with this area (and the Subject Lands in particular) is that the existing Medium/High-Density Residential designation with its height and density limits fail to leverage and optimize the diversity of land uses in this area.

### **Key Directions Report – Intensification Hierarchy**

The City’s Key Directions Report places an emphasis on clarifying and maintaining the urban structure hierarchy from the existing Official Plan, and appropriately designating intensification areas. The existing urban structure is shown in Figure 3 below.



Figure 3 Richmond Hill Intensification Hierarchy



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Source: Richmond Hill Emerging Key Directions Presentation, dated October 14, 2021

While we support the urban structure hierarchy, the City continues to overlook the as-of-right high-density uses within the emerging node at Leslie/John Birchall as an Intensification Area. According to the hierarchy in Figure 3, development within the Subject Lands (and the other high-density designated areas) would fall under “Neighbourhood Infill” or “Additional Residential Units”. This is not reflective of the as-of-right permissions the lands currently enjoy, or the attributes that make the larger node an appropriate intensification area.

The fact is that the emerging Leslie/John Birchall node shares many of the qualities that the City identifies in the Key Development Report as key factors to their other Intensification Areas (i.e. Key Development Areas and Local Centres). These factors include the inclusion of a “major retail function”, “large swaths of land that presently occupy low intensity commercial uses and expansive parking lots”, and “complete community areas”.

As part of the City’s Official Plan review exercise, we are requesting that the City properly identify the emerging node at Leslie Street John Birchall Road as an Intensification Area.

### What has changed since the NLSP approval in 2006?

The NLSP was approved in 2006, when the Growth Plan was still in its infancy and years before the adoption of the City’s in-force 2010 Official Plan. The NLSP permits buildings up to 10 storeys with a density of 2.0 FSI on the Subject Lands and other lands designated Medium/High Density Residential.

At the time of approval, a 10-storey building would have been one of the tallest buildings in the City where heights were generally capped at 15-storeys. Richmond Hill has historically directed height and density towards the Yonge Street corridor, however based on the

existing land use designations, there was recognition in the NLSP that the Leslie Street corridor north of Elgin Mills was intended for development in a more urban form, suitable for tall buildings.

With the updates to the policy regime at all levels of government since 2006, the focus has been to optimize land and make more efficient use of infrastructure and services. More recent policy direction has been to increase housing choice and accessibility in compact, complete communities. Since 2006, the City's definition of a tall building has also evolved. Recent approvals in the City's key intensification areas have seen buildings as tall as 30-40 storeys with densities far greater than 2.0 FSI.

## **Conclusion**

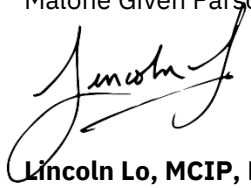
We believe that there is an opportunity through the City's Official Plan update to properly recognize the emerging node at Leslie Street and John Birchall Road as an Intensification Area that better reflects contemporary planning practices while maintaining the intent of the NLSP.

We also believe that the current height and density permissions for the Medium/High-Density Residential designation in the NLSP is outdated and do not reflect what such development looks like today in the City of Richmond Hill. The current permissions represent a missed opportunity to optimize development in the centre of a walkable, compact, 15-minute community.

We thank you for the opportunity to provide input on the City's Official Plan Update and look forward to continuing to engage with Staff through the process.

Should you have any questions or wish to discuss our comments, please do not hesitate to contact me at 905.513.0170

Yours very truly,  
Malone Given Parsons Ltd.



**Lincoln Lo, MCIP, RPP**  
**Principal**

cc      *Leslie Elgin Developments Inc.*