

May 18, 2022

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 Mayor and Members of Richmond Hill Council:

**RE: Richmond Hill Official Plan Update – OPA 18.3 (Vision & City Structure) and OPA 18.4 (Neighbourhoods)  
May 18, 2022 Statutory Public Meeting  
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”).

In response to the City’s Key Directions Report, MGP submitted a letter to Council on December 7, 2021, outlining our comments (included as Attachment A). On behalf of Leslie Elgin, we have further reviewed Staff Report SRPI.22.054 - *Request for Comments - Draft Official Plan Amendment 18.3 Vision and City Structure* and Staff Report SRPI.22.055 - *Request for Comments - Draft Official Plan Amendment 18.4 Neighbourhoods*, both dated May 18, 2022.

Based on our review of the proposed draft Official Plan Amendments, we continue to request 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.

In our opinion, the proposed amendment to identify the North Leslie Secondary Plan (“NLSP”) as *Neighbourhood Areas* in the Schedule A1 – City Structure fails to recognize the existing range of land use designations and densities within the secondary plan. Specifically, as it relates to the Subject Lands, the *Neighbourhood Areas* identifier does not capture the clustering and mix of commercial and medium/high density land uses, which has established a clear nodal vision at the intersection of Leslie Street and John Birchall Road.

### **OPA 18.3 – Vision and City Structure**

Draft Official Plan Amendment (“OPA”) 18.3 proposes to remove the existing outline surrounding the North Leslie Secondary Plan (“NLSP”) on Schedule A1 – *Urban Structure*, which identifies “*Lands subject only to the policies and schedules of Part II of this Plan*”.

Schedule 1 of OPA 18.3 now identifies the developable portions of the NLSP as *Neighbourhood Areas*.

While the existing Schedule A1 of the current 2010 OP shows an underlying *Neighbourhood Areas* designation on the NLSP, this designation/element was clearly superseded by the policies and schedules of the NLSP as noted in the legend. The existing label provides the necessary clarity on how the NLSP should be read within the policy framework of the Official Plan, which was that Part I of the Official Plan did not apply.

The proposed change to Schedule A1 to frame the NLSP and its range of land use designations within *Neighbourhood Areas* paints all 620 hectares of the NLSP area in broad strokes, despite the existing hierarchy and nodal framework within the secondary plan.

This amendment is also inconsistent with the established urban structure of the Official Plan. The lands designated *Neighbourhood Areas* in Schedule A1 – City Structure (currently Urban Structure) largely corresponds to the lands designated *Neighbourhoods* in Schedule A2 – Land Use of the OP. The *Neighbourhood Areas* designation is pre-dominantly occupied by low-rise residential uses with accompanying community servicing commercial and institutional uses. There is currently no area in the City that has the combination of as-of-right heights (10 storeys) and densities (2.0 FSI), adjacent to large-format retail/office land uses, that are found in the emerging Leslie Street and John Birchall node that is currently designated *Neighbourhoods / Neighbourhood Areas*.

With the proposed removal of the clarifying outline and legend text, in our opinion, there is an even greater need for the node surrounding Leslie Street and John Birchall Road to be identified as an Intensification Area. We continue to opine that this emerging node continues to share many of the qualities that the City identifies for other Intensification Areas (i.e. Key Development Areas and Local Centres).

As part of the City's OP review exercise, we are requesting that the City appropriately acknowledge the as-of-right permissions and community context of the Leslie Street and John Birchall emerging node and properly identify it as an Intensification Area consistent with the other areas of the City that share similar attributes.

### **Creation of Complete Communities and Mobility Hierarchy**

The intention of OPA 18.4 is to facilitate “the creation of complete communities, respect distinguishing features of neighbourhoods, and improve residents’ access to activities, services, and day-to-day needs within a 15 minute walking distance from their home”.

Additionally, through OPA 18.3 the City is intending to formalize a Mobility Hierarchy that prioritizes walking and active transportation at the top and private vehicle trips at the bottom (see Figure 1). The draft policies notes that this hierarchy “shall be applied to the planning, design and construction of transportation infrastructure; development and implementation of policies, programs and initiatives; and through the approval of development” [emphasis ours].

Figure 1: City Proposed “Mobility Hierarchy”



Source: City of Richmond Hill (2022)

Reviewed in conjunction, the direction provided in OPA 18.3 and 18.4 is that the City will prioritize the creation of 15-minute communities and will optimize development in such communities where the day-to-day needs of residents can be accomplished primarily through walking/active transportation.

The Subject Lands are ideally located in the centre of a complete community. The variety of land uses within walking/cycling distance creates a compact community where current and future residents have easy access to everyday amenities (see Figure 2). The Subject Lands have 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)

Figure 2: Aerial Map of Subject Lands and Surrounding Area



Source: Google Earth (2018), Malone Given Parsons Ltd (2022)

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

The walkability/bike-ability 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 should be recognized as an Intensification Area to optimize development within an already established complete community

## Conclusion

We continue to believe that there is an opportunity through the City's Official Plan Review exercise to properly recognize the emerging node at Leslie Street and John Birchall Road as an Intensification Area that better reflects City's urban structure and achieves the City's

intent on optimizing development within complete communities while maintaining the intent of the NLSP.

We thank you for the opportunity to comment on the City's Official Plan Amendments that will update the Official Plan with the City's 2041 Planning Vision and City Structure and *Neighbourhoods* designation policies and we 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.*