

June 24, 2022

*MGP File: 15-2437*

Richmond Hill Council  
225 East Beaver Creek Road  
Richmond Hill, ON L3B 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:           Item 3.1 Official Plan Amendment 18.3 Vision and City Structure  
              Report No. SRPI.22.075  
              Comments on Behalf of 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 Staff Report and Draft Official Plan Amendment 18.3 (the “Draft OPA”) which proposes amendments to the City’s Vision and Urban Structure in its Official Plan. We have participated in the City’s Official Plan Review process and previously provided a written submission to Council dated December 7, 2021, and made deputations to Council on December 8, 2021 and February 9, 2022 requesting that the East Beaver Creek Rd/Hwy 7 (“EBC”) Area be identified as a Key Development Area and not a Local Centre.

**We continue to be concerned that the EBC Area is identified as a Local Centre rather than a Key Development Area in the Draft OPA. We respectfully request that the EBC Area be elevated to a Key Development Area to recognize the significance of Hwy 7 as a Regional Corridor that has intensification opportunities. The identification of the EBC Area as a Key Development Area is consistent with City of Markham’s Key Development Area located on the south side of Hwy 7.**

As per our previous letter and deputation, we raised concerns with the identification of the EBC Area as a Local Centre. We remained concerned that the Local Centre designation will not permit the heights and densities envisioned by Sheraton for their lands.

In response to our concern, staff advised us that not all Key Development Areas (“KDAs”) and Local Centres are created equal and rather than be concerned with what the area is referred to within the urban structure (i.e. Local Centre vs KDA) we should focus on the heights, densities and uses that will be permitted as part of the future area planning. While we appreciate this response, we respectfully disagree. Based on our review of the draft OPA, we believe our concerns remain valid.

**The Proposed Official Plan Amendment language emphasizes greater densities and heights in Key Development Areas over Local Centres.**

The Draft OPA proposes language that reinforces our current understanding of the intensification hierarchy. Proposed policy 3.1.3(11) states:

**“Local Centres will accommodate intensification at a scale and intensity that is less than the KDAs. Local Centres will be important community focal points and will develop as revitalized, mixed-use centres with pedestrian-oriented, human-scaled main streets”.**

If other KDAs in the City are approved with heights in the range of 25+ storeys, our interpretation of this policy is that the heights in the EBC Local Centre will need to be less than the heights permitted in the KDAs. This reinforces our concern that identifying the EBC Area as a Local Centre will preclude the heights and densities (being 30+ storeys and 6.5 Floor Space Index) that Sheraton has envisioned which are necessary to support the planned hotel and convention centre expansion.

**The City’s Proposed Urban Structure places little emphasis on intensification along Hwy 7, which has the same status as Yonge Street - a Regional Corridor well served by Bus Rapid Transit.**

We believe that the City’s Urban Structure places a greater emphasis on intensifying the Yonge Street corridor over Hwy 7 despite both being identified as Regional Corridors in the current and draft Urban Structure schedule. Yonge Street and Hwy 7 share all of the same attributes - they are Regional Corridors where intensification is directed, served by bus rapid transit with multiple identified Major Transit Station Areas. Yet, the City’s current and planned urban structure identifies 2 KDAs along Yonge Street and none along Hwy 7.

**Lands on the south side of Hwy 7 are a Key Development Area.**

In contrast, Markham recognizes the importance of Hwy 7 and identifies a series of KDA’s along the entire length of Hwy 7.

The lands on the south side of the EBC Local Centre are identified to be within the Commerce Valley/Leitchcroft Key Development Area in the Markham Official Plan with the intersection of Leslie Street and Hwy 7 being identified as a Gateway Hub. This KDA has approved building heights of 34 and 37 storeys with several development applications under review for building heights greater than 40 storeys.

If the EBC Area continues to be identified as a Local Centre, we believe that this will limit the City’s ability to provide heights and densities comparable to those planned on the south side of the street. The identification of the EBC Area as a Local Centre will also create an imbalance within the Major Transit Station Areas that span both municipalities, north and south of this portion of Hwy 7.

**The Sheraton Lands and EBC Area are better characterized as a KDA.**

We continue to believe that EBC Area is best identified as a KDA. The Sheraton Lands and the EBC 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, both of which have a planned minimum density target of 200 people and jobs per hectare.

Furthermore, the lands are well served by bus rapid transit, and contain large, underutilized parcels ready for re-development and can accommodate greater heights and densities. Like other KDAs within the City, there are opportunities that should be unlocked in the EBC Area by elevating this area to a KDA status.

**For the reasons noted above, we respectfully request that the EBC Area be identified as a KDA and not a Local Centre.**

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  
Kelvin Kwan, City of Richmond Hill  
Patrick Lee, City of Richmond Hill  
Sybelle Von Kursell, City of Richmond Hill