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Our File No.: 140432

Via Email

Richmond Hill City Council
225 East Beaver Creek Road
Richmond Hill, ON
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Attention: City Clerk

Dear Mayor West and Members of Council:

**Re: Proposed Official Plan Amendment No. 18.8 – Oak Ridges Local Centre
Staff Report SRPI.23.069 – City File No. MOPA-23-0003
Council Public Meeting – June 20, 2023 – Item 11.8**

We are solicitors for Baif Developments Limited (“**Baif**”), the owner of the properties known municipally as 13515 and 13715 Yonge Street and 53 St. Laurent Drive, located in the southeast quadrant of the intersection of Yonge Street and Bloomington Road with approximately 670 metres of total frontage along Yonge (the “**Baif Property**”).

A draft plan of subdivision was approved for the Baif Property in 1997 which contemplated medium-density residential uses along the Yonge Street frontage. More recently, Baif submitted applications for official plan and zoning by-law amendments, together with revisions to its draft approved subdivision. The applications originally proposed high-density residential buildings of up to 12 storeys along Yonge Street, but Baif subsequently chose to withdraw the applications as they relate to the Yonge Street frontage to focus instead on the medium-density townhouse development proposed for the balance of its lands to the east. Accordingly, the applications currently identify the “Yonge Zone” as future development blocks.

We have reviewed the proposed Oak Ridges Local Centre Official Plan Amendment No. 18.8 (“**OPA 18.8**”) and the accompanying staff report SRPI.23.069. While Baif is generally pleased that staff are recommending the expansion of the Oak Ridges Local Centre designation to include the Baif Property, it is concerned that the proposed height and density restrictions are insufficient



to achieve the intended form of development or the objectives established in the City Plan 2041 Key Directions Report endorsed by Council in November 2021 (the “**Key Directions Report**”).

For example, the Key Directions Report noted that the boundaries of the Local Centre would be expanded to include vacant or underutilized lands and “allow for more opportunities to increase the mix of uses and to support aging in place and family oriented development”. Furthermore, Yonge and Bloomington was identified as a gateway location for notable urban design elements to properly demarcate these important arterial roads and to contribute to the authenticity and sense of place of the Oak Ridges Local Centre.

The new York Region Official Plan (“**ROP**”) designates this stretch of Yonge Street as a Regional Corridor and a Strategic Growth Area, which is required to support development at a minimum density target of 160 persons and jobs per hectare. The ROP directs local municipalities to establish minimum density and height policies. Although it acknowledges that the local context is important where the Regional Corridor traverses the Oak Ridges Moraine, the ROP does not direct or even contemplate the establishment of maximum densities or heights.

Local Centres are intended to function as urban main streets, with a compact, mixed use, well designed, pedestrian friendly and transit supportive built form. However, as currently drafted, OPA 18.8 will fail to optimize the Oak Ridges Local Centre in accordance with the applicable Provincial and Regional planning policy framework. The proposed maximum building height of 6 storeys and the proposed maximum site density of 2.0 FSI on the Baif Property will not facilitate the desired form of development or mix of uses, nor will it promote the creation of a gateway focal point at the north end of Yonge.

It is not practical to provide commercial uses at grade where the site density is arbitrarily and unnecessarily capped at 2.0 FSI. Moreover, it is not good planning to use the maximum site density as a further limitation on height as proposed through policy 4.3.2.1.8.

The Baif Property represents one of the primary opportunities to achieve the overall density target in this strategic growth area and the policy framework should be more permissive.

It should also be clarified in the proposed public realm policies in section 4.3.2.3 that the conceptual park, road and trail locations shown on new Schedule F2 are subject to further refinement through the development application process.

Finally, Baif is concerned that OPA 18.8 does not propose to amend the limits of the Oak Ridges Local Centre on Schedule A1 to match the limits proposed on Schedule A2, which will lead to unnecessary confusion. If Schedule A1 is not amended, the Baif Property will continue to have a Regional Corridor structural designation. The City Structure and Land Use Schedules should not show conflicting boundaries.

Thank you for your consideration. Please ensure we are provided with notice of any future meetings or decisions made by Council in respect of this matter.

Goodmans^{LLP}

Yours truly,

Goodmans LLP

Ian Andres

IDA/rr

cc: Paul Minz and Lynn Barkey, Baif Developments

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