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REAL ESTATE INVESTMENT TRUST

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- Sent via email –  
September 18, 2023

Chun Chu MCIP, RPP  
Senior Planner – Policy Planning  
Planning and Infrastructure Department  
City of Richmond Hill  
225 East Beaver Creek Road  
Richmond Hill, Ontario L4B 3P4

RE: Review of City of Richmond Hill's Draft OPA 18.5 – Yonge & Carrville/16th Avenue KDA

Dear Ms. Chu

Following up South Hill Shopping Centres' ("SmartCentres") submission from July 21, 2023, we have a further submission of feedback on the City of Richmond Hill's Draft Official Plan Amendment 18.5.

We understand that another draft of this Amendment to the City's Official Plan is forthcoming and hope you will incorporate our feedback.

We appreciate the City's commitment to consultation and please do not hesitate to reach out to the undersigned. We look forward to discussing this matter in the near future.

Sincerely,

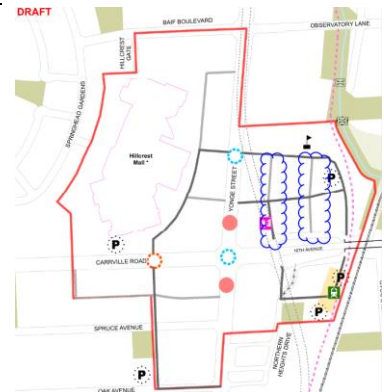
Marissa Vailer,  
Development Manager

OPA 18.5 PROPOSED CHANGES	COMMENT
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<b>4.4.2.1 MIX OF LAND USE</b>	
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<p>2. As the Yonge Street and Carrville/16th Avenue KDA redevelops over time, the proportion of gross floor area associated with commercial, retail, office, major office, or community uses shall retain a minimum of 15% of the overall total gross floor area in the KDA. Accordingly, the following policies apply in the KDA:</p> <p>b. To activate at-grade street frontages, development shall provide commercial, retail, or community uses at grade along arterial, collector, and local streets as shown on Schedule C2 (Public Realm).</p>	<p>We seek an update from staff on our request to provide more flexibility in Policy 4.4.2.1 (2b).</p> <p>The current language requires retail, commercial, or community uses at grade on all public roads. Since the Schedule C2 plan requires all roads to be public, this policy essentially requires all buildings to have retail, commercial and community uses at grade.</p> <p>We maintain that not <u>ALL</u> buildings should be subject to this requirement, just those in priority streets such as the market promenade.</p>
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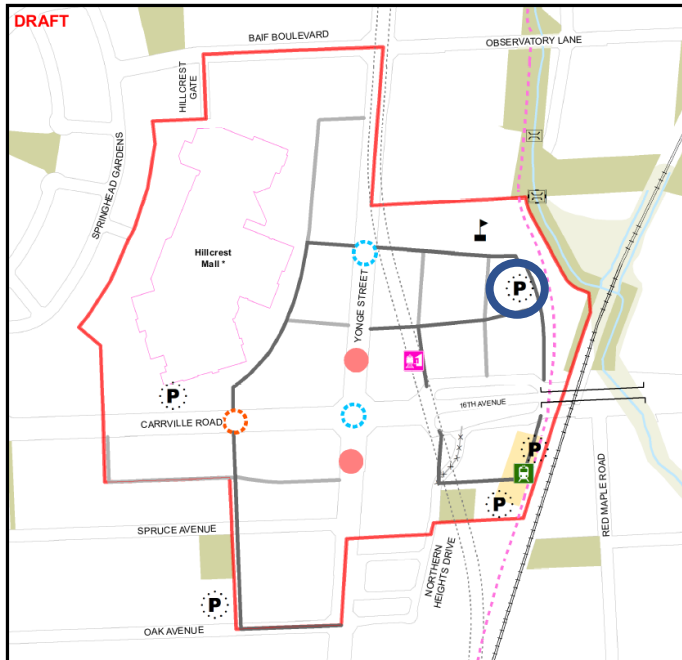
<b>4.4.2.3 PUBLIC REALM</b>	
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<p><b>Public Streets</b></p> <p>1. Proponents of development shall implement the street network and active transportation network as conceptually shown on Schedule C2 (Public Realm), to support a fine-grained street network along with more connections for cyclists and pedestrians</p> <p><u>Schedule C2</u></p> 	<p>We continue to have concerns with the requirement for <u>ALL</u> roads to be public.</p> <p>For consideration for future drafts of the OPA, we have two suggestions for staff to consider that address this concern.</p> <p>1) remove the roads segments bubbled in blue in image on the left. By removing these road segments from Schedule C2 it leaves the determination to a future date through site specific applications.</p> <p>2) add additional policy language to provide for future consideration or stratified public roads or private streets. Such language was used in the approved Yonge/Bernard KDA Secondary Plan Policies 12.4.4.7 &amp; 12.4.4.8.</p>
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<b>SCHEDULES</b>	
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<p><u>Schedule C1 Map</u></p> 	<p>We seek an update from staff on our request for adjustments to Schedule C1.</p> <p>1) clarification was requested as to why a division between two parcels with a 4.0 FSI was necessary?</p> <p>2) additional density is merited at the corner as our Phase 1 applications are currently seeking approx. 8.7 FSI. In consideration of this, we believe added density at the Yonge/16<sup>th</sup> intersection is appropriate. Also, upon further review we would like to request staff adjust the distribution of the density on our lands to provide for more density along 16<sup>th</sup> Ave. We believe it is appropriate to extend the 6.0 FSI permission easterly across the 16<sup>th</sup> Ave frontage and correspondingly reduce the density at the north.</p>
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**Schedule C2 Map**



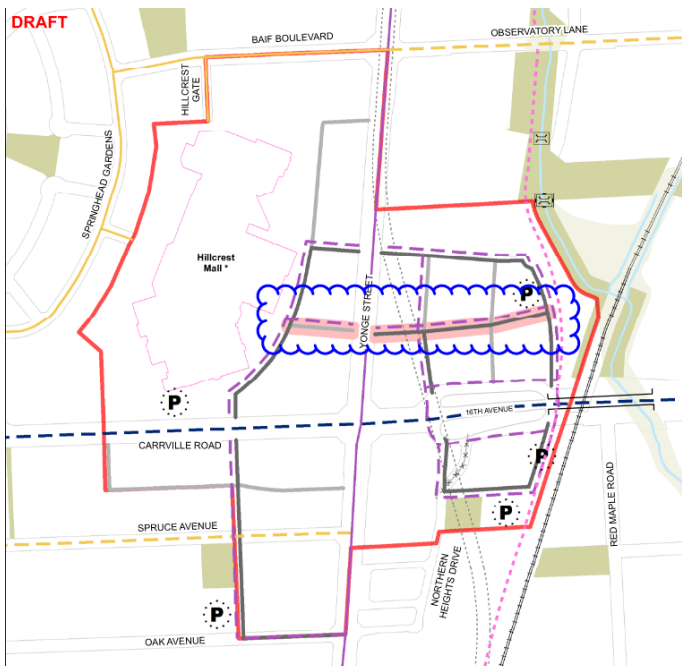
We seek an update from staff on our request for flexibility in the park location as shown on Schedule C2 such that the park location can be adjusted without the need for an OPA.

From a review of the existing Secondary Plans we note multiple examples of policy language consistent with our request that staff can draw upon in crafting a policy suitable for this Secondary Plan. Policy examples include,  
 -West Gormley Secondary Plan - S.8.6.5.2(d) & S.8.9.1(b)  
 -North Leslie Secondary Plan - S.9.6.6.2(a) & S.9.9.1(c)  
 -Yonge Bernard Secondary Plan - S.12.3(4)

Related to the requested flexibility in the park location we continue to have a concern with the prohibition in Policy 4.4.2.3 (2). Since the location of the north-south collector is conceptual and the limits of the greenway system are subject to further refinement (based on future study) to know the precise greenway limits we believe there is still potential for linear park space between the north-south collector road and limits of the greenway system.

We request the policies of the plan be revised to allow for this opportunity. The proposed revised language provided by email on Sep 12/23 does provide for relocation of the park to the north or south but not to the east. Allowing for a park east of the north-south collector will still allow for the desired views and access to German Mills Creek.

**Schedule C3: Market Promenade Relocation**



At our meeting on Sept 5<sup>th</sup>, Staff advised of the request from Oxford Properties to relocate the market promenade (on Oxford's property) further north to align to the signaled intersection on Yonge Street.

SmartCentres understands the reasoning behind Oxford's request and is open to adjusting the location of the market promenade on our property. However, we wish to discuss any specific adjustments to SmartCentres' lands that staff are considering before a change is implemented.

We would like to note that we are satisfied with the current location of the market promenade on our lands, as shown on Schedule C3.