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November 13, 2023

Our File No.: 140432

Via Email

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

Attention: City Clerk

Dear Mayor West and Members of Council:

**Re: Proposed Official Plan Amendment No. 18.8 – Oak Ridges Local Centre
Staff Report SRPBS.23.030 – City File No. MOPA-23-0003
Committee of the Whole Meeting – November 15, 2023 – Item 11.2**

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**”).

We previously wrote to City Council on June 20, 2023 to provide submissions on behalf of Baif in respect of staff report SRPI.23.069 and the previous draft of the proposed Oak Ridges Local Centre Official Plan Amendment No. 18.8 (“**OPA 18.8**”).

We have now reviewed the updated draft of OPA 18.8, along with staff report SRPBS.23.030 recommending its adoption by the City. While we acknowledge that staff have responded to our previous submissions by extending the Oak Ridges Local Centre designation on Schedule A1 to match the limits proposed on Schedule A2, the fundamental concerns raised by Baif remain unresolved in the updated draft.

Baif’s primary concern continues to be the inadequacy of the proposed height and density restrictions. The 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. Importantly, the ROP does not direct or even contemplate the establishment of maximum densities or heights in Strategic Growth Areas.



The City's Local Centres are intended to function as urban main streets, with a compact, mixed use, well designed, pedestrian-friendly and transit-supportive built form. Despite this objective, OPA 18.8 will not optimize the Oak Ridges Local Centre in accordance with the applicable Provincial and Regional planning policy framework if the maximum building heights and site densities remain unchanged. The staff report speaks to ensuring "a certain built form character is strictly maintained in light of the existing physical context" but this rigidity is unwarranted and counter-productive. If future development along the Yonge Street frontage of the Baif Property is "strictly" capped at 6 storeys and 2.0 FSI, OPA 18.8 will limit the amount of housing that can be provided and fail to produce the desired mix of uses or an effective gateway focal point.

It is also impractical to require the provision of non-residential uses at grade given the proposed height and density restrictions. Non-residential uses should be encouraged, not mandatory, in accordance with market realities.

Finally, while Baif appreciates that the park, road and trail locations shown on Schedule F2 are conceptual and that minor adjustments would not necessitate an official plan amendment, it must also be recognized that Baif has active rezoning and draft plan of subdivision applications for the Baif Property which predate OPA 18.8 and which therefore must be evaluated on their merits independent of whatever policy direction might ultimately be approved through OPA 18.8. That said, the park, road and trail locations contemplated in Baif's applications are anticipated to remain generally consistent with those shown on Schedule F2.

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

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read "Ian Andres", written in a cursive style.

Ian Andres
IDA/rr

cc: Paul Minz and Lynn Barkey, Baif Developments

1375-4017-0504