



**Zelinka Priamo Ltd.**

LAND USE PLANNERS

**VIA EMAIL**

November 14, 2023

Committee of the Whole  
City of Richmond Hill  
225 East Beaver Creek Road  
Richmond Hill, ON  
L4B 3P4

Dear Sirs/Mesdames:

**Re: City of Richmond Hill Official Plan Review – Draft OPA 18.8  
Draft Oak Ridges Local Centre Land Use Policies  
Preliminary Comments on Behalf of Oak Ridges Retail GP Limited  
Richmond Hill, ON**

**Our File: CHO/RCH/22-01**

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On behalf of the Owner of 13265 Yonge Street (the “subject lands”), Oak Ridges Retail GP Limited, we have been monitoring the Richmond Hill Official Plan Review process, including Draft OPA 18.8 (Oak Ridges Local Centre), which includes the subject lands.

At this time, the Owner does not have specific redevelopment intentions for the subject lands, and seeks to maintain existing operations as well as opportunities for minor infill and expansion.

Based upon our review of Draft OPA 18.8, we have preliminary comments as outlined below and will continue to review the Draft OPA in more detail, and may provide further comments as required.

**DRAFT OFFICIAL PLAN AMENDMENT 18.8**

Based on our review of the Draft OPA 18.8 schedules, we note the following:

- According to Schedule F1, the subject lands are proposed to have a maximum floor space index (“FSI”) of 2.5; and
- According to Schedule F2, the subject lands are adjacent to a proposed Planned Bus Rapidway Transit Station and new signalised intersection at Regatta Avenue.

At this time, our preliminary comments are as follows:

- As a general comment, we are concerned that the language, as proposed, does not sufficiently protect for interim development considerations that reflect the context of the broad range of existing development and uses within the Oak Ridges Local Centre. In our submission, interim development policies should be provided within OPA 18.8 to provide certainty that existing sites are not stagnant until such time as a comprehensive redevelopment is advanced over the long term.

In our submission, traditional large-formal commercial sites (such as the subject lands) have the potential to contribute to increases in employment densities; make more efficient use of lands and servicing; contribute to monies in the form of development changes and/or cash-in-lieu; and contribute to the creation of a complete community within the Oak Ridges

Local Centre prior to comprehensive redevelopment. **Maintaining permissions for as-of-right infill and expansion opportunities is therefore desirable for the continued viability of existing commercial development and appropriate and proportional growth along the identified Regional Corridor.**

We note that Draft Policy 4.4.2.1.7 of OPA 18.5 (Yonge and Carrville/16<sup>th</sup> Avenue Key Development Area) explicitly provides interim development policies for non-residential development that is, “*not permanent in nature or duration and is two stories or less ... as additions to the existing building(s) or as stand-alone building(s).*” It is important to note that the Yonge and Carville/16<sup>th</sup> Avenue lands are within a protected major transit station area (“PMTSA”), which are to meet specific levels of density and intensification over the long-term, as required by the *Planning Act*, to support investments in existing and/or in-delivery higher-order transit services.

The Oak Ridges Local Centre, including the subject lands, are not within a PMTSA. It is therefore appropriate to consider similar flexible policies to permit the incremental intensification of the lands prior to comprehensive redevelopment, as the delivery of higher-order transit infrastructure/services along this segment of Yonge Street is undetermined.

- Draft Policy 4.3.2.1.7 specifies that development shall have a minimum height of 2 storeys. Staff’s rationale states, “*The 2 storey minimum height limit is proposed to be added to restrict development of any new 1 storey developments (e.g. strip malls, 1 storey commercial) which would not meet the vision of the Local Centre as a ‘modern main street’.*”

**In our submission, this minimum height should not apply to interim development, such as infill and expansions, as this requirement may have the inadvertent effect of limiting development potential and growth in the near- to- medium-term.** Until such time that the redevelopment of existing large-format commercial lands is viable, interim development that does not preclude redevelopment is appropriate to consider within the Oak Ridges Local Centre.

We thank you for the opportunity to provide comment on this process. On behalf of the Owner, we reserve the right to provide further comments on the Official Plan Review process.

We would welcome the opportunity to meet with Staff to discuss our comments further. Please kindly ensure that the undersigned is notified of any further meetings with respect to this matter, as well as notice of the adoption of future Official Plan updates.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Azar Davis, BURPI, CPT  
Planner

cc. Oak Ridges Retail GP Limited (via email)