

November 28, 2023

MGP File: 19-2794

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

Attention: Chun Chu, Senior Planner

**RE: Yonge and Carrville/16th Key Development Area (OPA 18.5)
Parioli Peak Estates Inc.
77 and 89 16th Avenue, City of Richmond Hill**

Malone Given Parsons Ltd. (**MGP**) is the planning consultant for Parioli Peak Estates Inc., the owner of the 1.4 hectares (3.5 acres) of land generally located south of 16th Avenue, east of Yonge Street, municipally known as 77 and 89 16th Avenue in the City of Richmond Hill ("**Subject Lands**"). The Subject Lands are within Yonge and Carrville/16th Key Development Area.

Parioli Peak Estates Inc has been participating in the ongoing planning process for the Yonge and Carrville/16th Key Development Area and has submitted planning applications (D01-22001, D02-22001 and SUB-22-0001) to facilitate a high-density mixed-use development. In addition, we have provided written comments on June 20, 2023 regarding the materials presented at the June 7th Open House (see Attachment 1). This letter provides further follow-up comments regarding the Yonge and Carrville/16th Key Development Area (OPA 18.5) as it relates to the Subject Lands.

We continue to support the approach the City has taken with regard to the mix of land uses and the utilization of the angular plane principles to inform heights within the Yonge and Carrville/16th Key Development Area. We understand the significant effort that was put into the Yonge Street Bernard KDA policy framework and appreciate that this approach has been brought forward to the Yonge and Carrville/16th Key Development Area as well.

The remainder of this letter provides a summary of the comments.

Policy	Comment
<p><u>4.4.2.1 (2b) & 4.4.2.1 (2e)</u></p> <p>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</p>	<p>As noted above, we support the approach the City has taken with encouraging a mix of land uses. In this case, provides a way to animate and activate the streetscape and public realm. These policies however appear to require on all public street frontages that retail, commercial or community uses are provided and that only those uses can be providing on frontages with public parks or urban plazas. In our opinion, this is an overly restrictive policy and more flexibility should be built-in to the policies to take into account the local context. Furthermore, the proposed policy wording does not align with the rationale/comments provided by staff that Policy 2e</p>

<p>provide commercial, retail, or community uses at grade along arterial, collector, and local streets as shown on Schedule C2 (Public Realm)</p> <p>e) Retail, commercial or community uses are required to front onto existing or planned public parks or urban plazas.</p>	<p>“is added to encourage non-residential uses to front onto to open spaces to animate them. It is acknowledged that this animation is highly desirable within the KDA, <u>however, some flexibility in the application of this policy is warranted.</u>” [emphasis added]</p> <p>For consistency purposes, we request the policy wording be revised to provide the intended flexibility on providing non-residential uses, while meeting the overall objective to encourage animation onto the public realm, specifically for open spaces.</p> <p>As such, we propose the following policy changes:</p> <p>b) To activate at-grade street frontages, development is encouraged to provide commercial, retail, or community uses at grade along arterial, collector, and local streets as shown on Schedule C2 (Public Realm)</p> <p>e) Retail, commercial or community uses are encouraged to front onto existing or planned public parks or urban plazas.</p>
<p><u>4.4.2.1 (3)</u></p> <p>The maximum site density for development within the Yonge Street and Carville/16th Avenue KDA is shown on Schedule C1 (Density Allocation).</p>	<p>There is a recognition in the Yonge and Carville/16th Key Development Area will be transformed into a highly transit supportive complete community. A range of high order transit is proposed to be located throughout the KDA, including a planned TTC station and GO station, in addition to the local high-frequency bus services along the arterial roads. Typically, all these services are constructed around the intersection allowing for a more nodal approach to distributing density, which is the current approach the City has undertaken. While this is normally appropriate, the planned higher-order transit services are more spread out in this KDA. As such, it is more appropriate to consider a concurrent distribution of density that is more spread out and focusses density around the intersection as well as the planned high-order transit. This aligns with the planned growth hierarchy as detailed in proposed Policy 4.4.2.1(6d), which states that “the tallest heights should be directed to the Yonge and Carrville/16th Avenue intersection and to lands adjacent to the potential future GO Transit and TTC Subway stations.” In conjunction with the angular plane policies to regulate height, it is our opinion that density should be deployed in a more appropriate manner throughout the KDA with a focus on the Yonge/Carrville/16th intersection in addition to the planned high-order transit stations in order to fully optimize and leverage the public investments in infrastructure.</p>

	<p>OPA 18.5 proposes that the Subject Lands be limited to a maximum density of 4.0 FSI. Given the above, it is our opinion that the Subject Lands has attributes where greater densities are warranted given its locational attributes.</p> <p>We are respectfully requesting that the City revise the maximum density permissions for the Subject Lands to permit at least a maximum Floor Space Index of 5.5, which would facilitate the proposed development on this site, which provides a high-density, compact, pedestrian-friendly, and transit-supportive development within the Key Development Area.</p>
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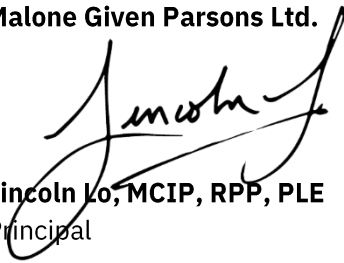
Conclusion

We thank staff for allowing us the opportunity to provide input into the Yonge and Carville/16th Key Development Area (OPA 18.5) process.

Thank you for the opportunity to input in this process. I look forward to discussing our requests with staff. Should you have any questions regarding these comments or would like to discuss further, please feel free to contact the undersigned.

Yours truly,

Malone Given Parsons Ltd.



Lincoln Lo, MCIP, RPP, PLE
Principal

cc: Parioli Peak Estates Inc

Encl: Attachment 1

ATTACHMENT 1



Lincoln Lo
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June 20, 2023

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City of Richmond Hill
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Richmond Hill, L4B 3P4

Attention: Chun Chu, Senior Planner

**RE: Yonge and Carrville/16th Key Development Area (OPA 18.5)
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Parioli Peak Estates Inc has been participating in the ongoing planning process for the Yonge and Carville/16th Key Development Area and has submitted planning applications (D01-22001, D02-22001 and SUB-22-0001) to facilitate a high-density mixed-use development. MGP has reviewed the materials presented at the June 7th Open House on the Yonge and Carrville/16th Key Development Area (OPA 18.5) and are writing to provide input on the policy direction as it relates to the Subject Lands.

We generally support the approach the City has taken with regard to the mix of land uses and the utilization of the angular plane principles to inform heights within the Yonge and Carville/16th Key Development Area. We understand the significant effort that was put into the Yonge Street Bernard KDA policy framework and appreciate that this approach has been brought forward to the Yonge and Carville/16th Key Development Area as well.

There is a recognition in the Yonge and Carville/16th Key Development Area will be transformed into a highly transit supportive complete community. As such, OPA 18.5 identifies densities for each development site within the KDA that is intended to aid in supporting that objective. We believe that the Subject Lands has attributes where greater densities are warranted given its locational attributes.

We are respectfully requesting that the City revise the maximum density permissions for the Subject Lands to permit a maximum Floor Space Index of 5.5 that would permit the proposed development on this site, which provides a high-density, compact, pedestrian-friendly, and transit-supportive development within the Key Development Area.

The remainder of this letter provides a brief site context and justification for the above request.

Site Context

The Subject Lands are comprised of two parcels located at 77 and 89 16th Avenue, on the south side of 16th Avenue, between Yonge Street and the C.N. railway corridor in the City of Richmond Hill. The Subject Lands do not front directly onto 16th Avenue, but rather have frontage along a service road that connects to 16th Avenue. The Subject Lands currently contains a Honda car dealership and is comprised of two parcels approximately 1.44 hectares (3.55 acres) in size.

Figure 1: Site Context



The surrounding area is comprised of a variety of land uses including mid- and high-rise apartment buildings, single family homes, retail plazas, and public facilities such as a school and parks. Hillcrest Mall is the largest landholding in the Yonge and 16th/Carville intersection and is the City's largest indoor shopping mall and functions as a regional draw. A C.N. railway corridor bisects the Subject Lands from the lands to the east.

Due to the area's designation as a KDA and the investment in high-order transit in the area, the emerging development context around Yonge and 16th/Carville is changing rapidly from a suburban to urban environment. There are several new high-rise apartment buildings that are either planned, recently approved or under construction. Re-investment is also occurring in the low-density residential areas as older single-detached dwellings are being replaced with newer contemporary dwellings.

The policy context anticipates substantial redevelopment in the Yonge and 16th Avenue KDA, with mixed-use buildings and greater heights and densities than most other areas of the City, which is generally reflected in the current draft of OPA 18.5.

The proposed high-density development on the Subject Lands represents an appropriate built-form at this location as it will act as a transition from the taller and more intense uses planned at the intersection of Yonge and 16th/Carrville to the lower density forms of housing to the south and east side. This Subject Lands are intended to be a hub of activity centered around the planned GO Transit immediately to the east and a potential future TTC subway station immediately to the northwest, in addition to the existing higher-order transit (VIVA) along Yonge Street. This proposal will assist the planned higher-order transit investment in

the area by increasing the ridership base immediately adjacent to planned and existing transit.

Request for Increased Density on Subject Lands

OPA 18.5 proposes that the Subject Lands be limited to a maximum density of 4.0 FSI, while immediately west, the plan permits a maximum density of 8.77 FSI. It is our opinion that a density permission of 5.5 FSI is appropriate for the Subject Lands as it is a reasonable density reduction from the lands to the west (which is a corner site with dual frontage) and is similar to the density permissions for the site immediately southwest of Subject Lands.

Obtaining a density permission of 5.5 FSI would allow development of the Subject Lands to proceed as proposed, which has been designed to be sensitive to the closest low-density residential uses (townhouses) to the south and east. The proposed redevelopment is separated from the townhouses to the south by the planned park system and 26m collector road; and is separated from the townhouses to the east by the CN rail corridor. The proposed tall buildings meet the 45-degree angular plane measured from each of these townhouse developments. The towers are designed with slender (~750sm) floorplates with at least 25m of separation distance between each tower. This will ensure that any shadow impacts to the surrounding neighbourhood will pass quickly, and that any impacts associated with wind and skyview are mitigated.

Conclusion

We thank staff for allowing us the opportunity to provide input into the Yonge and Carville/16th Key Development Area (OPA 18.5) process. We are generally supportive of the City's approach to the Secondary Plan to create a development node around the Yonge and Carrville/16th intersection utilizing an angular plane approach to regulate heights.

As it relates to the Subject Lands, we believe a revised density permission of 5.5 provides the flexibility required to redevelop the lands into a mixed-use project that optimizes the site given its locational characteristics and implements the vision of this KDA.

Thank you for the opportunity to input in this process. I look forward to discussing our requests with staff. Should you have any questions regarding these comments or would like to discuss further, please feel free to contact the undersigned.

Yours truly,

Malone Given Parsons Ltd.



Lincoln Lo, MCIP, RPP, PLE
Principal

cc: Parioli Peak Estates Inc