



Village Core Residents
Association
Richmond Hill, ON
VCRA2021@gmail.com

April 6, 2022

VIA EMAIL TO: leighann.penner@richmondhill.ca

Ms. Leigh Ann Penner
Planning and Infrastructure Department
City of Richmond Hill
225 East Beaver Creek
Richmond Hill, ON L4B 3P4

Re: Comments on Resubmission Documents for OPA/ZBA Applications D01-20014 and D02-20028 by Acorn Major Mack Inc., 190-230 Major Mackenzie Drive and 129-147 Arnold Crescent, Richmond Hill

Dear Ms. Penner,

As you know, the original submissions for the above captioned development applications were filed with the City in August 2020, representing a proposal for significant overdevelopment of the subject lands. First circulation comments from the City, the TRCA, and other agencies outlined many significant concerns to be addressed. The Village Core Residents Association (VCRA) also provided several letters describing our concerns with the proposal, and Area residents expressed their individual concerns in letters, at a Council Public Meeting on March 24, 2021, and in a subsequent Community Public Meeting on May 31, 2021.

At the Community Public Meeting, the developer expressed a willingness to meet with representatives of the community to further engage in discussions about the proposal, and a small Focus Group was formed for this purpose. The Focus Group met with representatives of the development team four times between September 2021 and February 2022. As a result of this exercise, the developer changed several aspects of the development proposal and submitted revised plans and reports to the City on March 1, 2022, a copy of which was provided to the VCRA. The key changes to the development proposal are summarized in the cover letter from the Goldberg Group dated March 1, 2022.

While the revised development proposal is a significant improvement over the original proposal in many respects, the VCRA does not support the entirety of the revised development plans, and has continued concerns over several aspects of the proposal as outlined in this letter.

A. Excessive Height and Density

The current site design indicates two phases to the development; Phase 1, comprising the northern portion of the site, represents townhomes and mid-rise buildings up to 6 storeys in height, while Phase 2, comprising a smaller portion of the site facing Major Mackenzie Drive includes high-rise buildings which are 12 and 17 storeys high.

As you know, these lands are not within any MTSA or KDA, and Major Mackenzie is not a Regional Corridor. The high-rise buildings proposed for Phase 2 of the development are excessive for this site, well beyond the allowable height limits of the current Neighbourhood designation and also beyond the limits of the adjacent Trench Street Local Development Area (LDA). Other current development proposals along Major Mackenzie that are a similar distance from Yonge Street are much lower in height (4-6 storeys), and developments along Yonge Street itself, in the adjacent Village District area immediately north of Major Mackenzie Drive, are limited to 5 storeys in the current Official Plan. The developer's proposal for this amount of height on Major Mackenzie is clearly not supportable. This was also pointed out by the Region of York in their review of the original submission.

Mainly due to the excessive height of the buildings proposed for Phase 2 of the development, the overall density of the revised proposal is still above reasonable benchmarks. The developer's OPA application proposes to extend the Trench Street LDA designation to these lands, however the target density of the LDA is 1.5 FSI. The revised submission indicates that the development proposal represents an FSI of 1.85, however this calculation is misleading as it includes the non-developable lands associated with the watercourse that will be conveyed to the City (should they agree to such conveyance). If the non-developable lands are removed from the calculation, the actual density of this revised development application is approximately 2.32, well beyond the target for the LDA and, of course, well in excess of the currently allowed density under the existing Neighbourhood designation of 50 units per hectare. Reducing the height of the future Phase 2 buildings on Major Mackenzie to 8 storeys or less is anticipated to result in an overall site density (excluding the watercourse) of approximately 1.5 FSI, in line with the target for the LDA.

The heights and densities of the proposed buildings in Phase 1 of this revised development plan are much more reasonable than those previously proposed, although the form of the 6-storey midrise buildings is still considered to be imposing relative to the scale of the surrounding neighbourhood; we recommend additional setbacks and/or terracing of these buildings above the 4th storey to minimize their visual impact and maximize the pedestrian realm.

B. Watercourse and Aquifer

In our opinion, the revised development proposal has not done enough to address the concerns stated by many agencies and the public regarding the realignment of the watercourse.

The proposal continues to disregard the requirement for a *minimum* 10 metre setback from top of bank, as pointed out by the TRCA and two City departments, leaving insufficient space for tree-planting and greening of this buffer. The design of the watercourse continues to be of concern, with engineered stone treatments and buttresses to prevent erosion due to excessive slopes, and practically no integrated natural features. The proposal also ignores the requirement to investigate low-impact development (LID) techniques for the revised watercourse, which the developer claims cannot be explored due to "limited space available" caused by "the size of the proposed development" (Functional Servicing Report, sections 2.4.2 and 2.4.3). Clearly, these are not valid reasons as the development can and should be reduced in size to accommodate green sustainability features such as grassed swales, wetlands, and wet or dry ponds, all of which may be possible to integrate within a wider buffer zone measured from the top of bank.

It is noted that the revised Geomorphic Assessment report and associated response letter from Beacon Environmental do not actually address the comments of the TRCA as outlined in their letter of May 31, 2021, but seem to suggest that the TRCA had already provided tacit approval of their proposed plan in the context of separate agreements or meetings conducted in November 2019, before this development application was even submitted. We are strongly opposed to any such notion, and request that both the City and the TRCA insist that the developer respond appropriately to the concerns that were presented in response to this

development application and this application alone. Any prior correspondence or agreements relating to other prior applications which the developer has since chosen to retract are irrelevant in the context of this current development proposal.

The current reports also do not respond to concerns presented previously about the proposed permanent discharge of 114,000 L of water per day from the aquifer to the City's sewer or storm water systems. This is not a sustainable or ecologically sound practice. It is also roughly equivalent to about half of the expected runoff from the surface of the entire site (just over 2 hectares) during a heavy rainfall, for which the City of Richmond Hill now charges a fixed rate to support the "ongoing maintenance and rehabilitation of Richmond Hill's stormwater facilities". Accordingly, if another more sustainable practice of draining groundwater at this site cannot be found, suitable charges should be levied to compensate for the proposed atypical use of the City's infrastructure on a permanent ongoing basis.

C. Traffic

The reduced number of units in the current development proposal helps to reduce concerns related to traffic congestion, and the proposed addition of a left-turn lane at Arnold Crescent and Major Mackenzie reduces concerns regarding neighbourhood infiltration. A further reduction in development density as described above should resolve our main concerns regarding traffic.

However, it is noted that the current proposal does not respond to the recommended incorporation of a right-turn lane from Major Mackenzie into the development, citing the driveway to the adjacent high school as an example. We note that unlike the high school, the right-in/right-out driveway for this development is very close to the intersection at Arnold Crescent, and a right-turn lane would help greatly to reduce potential conflicts.

In conclusion, while we appreciate the opportunity to have participated in the Focus Group with the developer, and consider the revised development proposal to be a step in the right direction, it is not yet acceptable for several reasons as outlined above. We would welcome the opportunity to discuss our outstanding concerns with you further, at your convenience.

Warm regards,

Brian Chapnik, PhD, PEng
Chair, Village Core Residents Association
VCRA2021@gmail.com

Cc: Raika Sheppard, Councillor of Ward 4, Richmond Hill
David West, Mayor of Richmond Hill
Kelvin Kwan, Commissioner of Planning
Dan Terzievsky, Director of Development Engineering and Transportation
Linda Bui, Toronto and Region Conservation Authority
Lynn Barkey, Acorn Major Mack Inc.

Bcc: Village Core Residents Association
RHURG