



September 18, 2025

Stephen M.A. Huycke, City Clerk  
The Corporation of the City of Richmond Hill  
225 East Beaver Creek Road  
Richmond Hill, Ontario L4B 3P4

To His Worship and Members of Council:

**Subject: Comprehensive Zoning By-law No. 30-25  
10794 Yonge Street**

M. Behar Planning & Design Limited acts on behalf of 10794 Yonge Holding Inc, the (“**Owner**”) of the property legally described as Part 1 – Plan of Survey of Part of Lots 1 & 2, Registered Plan 293 A, and municipally known as 10794 Yonge Street (the “**subject property**”).

A Pre-Consultation meeting was previously held with City Staff for the above noted property to review the potential redevelopment of the property with a tall building containing a mix of uses (City File: PRE-25-0032). Comments and submission requirements were provided by the City on July 7, 2025. We are currently in the process of coordinating the preparation of materials to support the required applications to permit the intended development.

We have reviewed the draft policies, particularly those around height and density and we note the following:

- As per Schedule A-1, the subject lands are proposed to be zoned Regional Mixed Use (RMU-CORE1)
- As per Schedule B4-5, the subject lands are proposed at a maximum of 2.0 FSI.
- As per Schedule C4-5, the subject lands are proposed for a minimum height of 3 storeys and a maximum height of 15 storeys. The resulting podium requirements include a 4 storey (14m) maximum.

We have concerns with the draft policies and have prepared this submission to ensure that the proposed amendments do not prejudice any potential future development application.

In our view:

- The maximum height of 15 storeys isn't sufficient to appropriately achieve consistency with the Provincial Planning Statement, 2024, nor is it a sufficient density to warrant the level of transit infrastructure being scheduled for Richmond Hill. Staff should consider a more contextually appropriate height regime of 25-30 storeys.
- The subject lands are within PMTSA 46 – Elgin Mills BRT Station. Significant bus rapid transit is scheduled along Yonge Street in dedicated lanes with a BRT Station at Yonge Street and Elgin Mills Road, within 100m of the subject lands.
- The current maximum density of 2.0 FSI is an artificially low density that does not implement Provincial or Regional policies. This density is more indicative of a stacked townhouse / grade related housing form. This inconsistency between height and density currently permitted, should be more closely examined.
- Staff should consider increasing the maximum podium height of 6 storeys to be consistent with the Richmond Hill Official Plan and Richmond Hill Urban Design Guidelines.

Please contact the undersigned if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read "Chris Pereira". The signature is fluid and cursive, with a large initial "C" and "P".

Chris Pereira, MCIP, RPP  
Principal  
MBPD Limited