

Appendix E to SRPI.21.023

Comments from External Agencies, Prescribed Bodies, and other Organizations

Ministry of Municipal Affairs
and Housing

Municipal Services Office
Central Ontario

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Toronto ON M7A 2J3
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Ministère des Affaires municipales
et Logement

Bureau des services aux municipalités
du Centre de l'Ontario

777, rue Bay, 13^e étage
Toronto ON M7A 2J3
Téléc. : 416 585-6882



by email only

December 16, 2020

Sybelle Von Kursell
Manager, Policy Planning
City of Richmond Hill
225 East Beaver Creek Road,
Richmond Hill, ON L4B 3P4

RE: City of Richmond Hill Draft Official Plan Amendment No. 23 for Additional Residential Units
MMAH File No.: 19-EOPA-207277

Dear Sybelle Von Kursell,

Thank you for circulating the City of Richmond Hill's draft Official Plan Amendment No. 23 (OPA 23) for Additional Residential Units (ARUs). The Government believes that all Ontarians deserve a place to call home. In 2019, the Government introduced **More Homes, More Choice: Ontario's Housing Supply Action Plan** to support the building of new affordable housing and provide people with more options that fit their needs and budgets. These changes will make it easier for homeowners to create additional residential units on their property, add to the housing stock and provide Ontarians with more housing choices.

OPA 23 proposes to permit an ARU within a ground-related dwelling (single detached, semi-detached or townhouse), and in a structure ancillary to the ground-related dwelling on the same lot. OPA 23 applies city-wide in areas zoned for residential development, except for lands located in hazard lands, hazardous sites, the Greenbelt Plan Natural Heritage System, and the Oak Ridges Moraine Conservation Plan Natural Core and Linkage areas.

I understand that a public meeting was held on December 2, 2020 and a final proposed amendment will be presented to City Council in early 2021.

The authority for municipalities to permit ARUs is provided through Section 16 (3) of the *Planning Act* which states that an official plan shall contain policies that authorize the use of ARUs by authorizing:

- a) the use of two residential units in a detached house, semi-detached house or rowhouse; and
- b) the use of a residential unit in a building or structure ancillary to a detached house, semi-detached house or rowhouse.

Based on the review, OPA 23, as drafted, is consistent with Section 16 (3) the *Planning Act*. The Ministry commends the City for its efforts in implementing key provincial priorities related to housing. We have not identified any significant concerns with OPA 23, but offer the following comments and recommendations for the City's consideration.

Draft OPA 23 provides the permission for an ARU in an ancillary structure through the definition of an ARU, not directly in the policy. For added clarity, we recommend the City adds a reference regarding the permission in Policy 3.1.5 (5) of the OPA.

Further, Ontario Regulation 299/19 prescribes the implementing details for ARUs with the purpose of reducing certain barriers, including parking barriers, occupant restrictions and the dwelling age. It's unclear at this point what parking requirement is envisioned by the City. It is my understanding that an implementing zoning by-law amendment is being prepared by the City, which may provide the details for parking requirements. I note that the current Policy 3.1.5 (5) in the City's Official Plan, to be replaced by OPA 23, does contain a parking requirement. We recommend the City consider adding references to the parking requirement, as well as requirements relating to occupants and dwelling age, in accordance with Ontario Regulation 299/19.

Lastly, an ARU is permitted within an existing single dwelling or an ancillary structure for lands within the Greenbelt Plan Countryside designation; and within a single dwelling for lands in the Oak Ridges Moraine Conservation Plan Countryside Area designation. The City may wish to clarify if the permission for lands in the Oak Ridges Moraine Conservation Plan Countryside Area designation is also for existing dwellings.

Thank you again for circulating the draft amendment to the Ministry for our review and input. Should you have any questions, please contact me at 416-585-6652 or alternatively by email at julianna.zhuo@ontario.ca

Sincerely,

<Original Signed By>

Julianna Zhuo
Planner, Community Planning and Development (East)



November 19, 2020

Mr. Kelvin Kwan
Planning and Regulatory Services Department
City of Richmond Hill
225 East Beaver Creek Road
Richmond Hill, ON L4B 3P4

Attention: Chun Chu, Senior Planner

**RE: Official Plan Amendment 23 (LOPA.20.R.0062)
City of Richmond Hill**

This is in response to your circulation and request for exemption from Regional approval for the above-captioned City-initiated Official Plan Amendment (OPA).

Official Plan Amendment

Purpose and Effect of the Proposed Amendment

The purpose of the proposed City-wide Amendment to the Richmond Hill Official Plan is to permit an additional residential unit within a ground-related dwelling and in a structure ancillary to the ground-related dwelling on the same lot, effectively allowing up to a maximum of three dwelling units. The Amendment conforms with Provincial legislation to facilitate housing diversity and will assist in increasing the supply of affordable housing to meet the needs of Richmond Hill residents.

The additional permissions the Amendment provides would not apply to existing ground-related dwellings located in hazard lands and hazardous sites, lands within the Greenbelt Plan Natural Heritage System, and lands within the Oak Ridges Moraine Conservation Plan's Natural Core and Natural Linkage areas.

Exemption from Regional Approval

The OPA application and associated exemption request was considered by Regional staff and based on our review, the proposed OPA appears to be a routine matter of local significance. Further, in accordance with Regional Official Plan Policy 8.3.8, the proposed Amendment does not adversely affect Regional planning policies or interests.

Pursuant to Council authorization specified in By-law A-0265-1999-017, this application is hereby exempted from approval by Regional Planning Committee and Council. This allows the Amendment to come into effect following its adoption by the City of Richmond Hill and the expiration of the required appeal period.

Summary

York Region has no objection to the proposed Official Plan Amendment. We request that a copy of the Notice of Decision for the OPA be forwarded to this office. Should you have any questions regarding the above, please contact Justin Wong, Planner, at 1-877-464-9675 ext. 71577 or by email at Justin.Wong@york.ca should you require further assistance.

Sincerely,



Karen Whitney, M.C.I.P., R.P.P.
Director of Community Planning and Development Services

JW/



Fri 1/29/2021 4:32 PM

Quentin Hanchard <Quentin.Hanchard@trca.ca>

RE: City of Richmond Hill - Official Plan Amendment 23 - Additional Residential Unit

To ☒ Chun Chu; ☐ Linda Bui

You replied to this message on 1/29/2021 5:48 PM.

! CAUTION: This email is from an external source. Please do not click links or open attachments unless you recognize the sender.

Hi Chun, thank you for following-up with us on this. The amendments that you have proposed, which clearly identify that the additional units shall not be permitted in lands subject to natural hazards, as well as the Natural Heritage System, are consistent with our previous discussions, and are satisfactory to TRCA staff.

Thank you again for incorporating our comments and for seeking our input,

Regards, Quentin

Quentin Hanchard, MES(PI), MCIP, RPP, EP, PLE
Associate Director
Development Planning and Permits | Development and Engineering Services

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Please note that TRCA's Offices are presently closed to visitors. The plan input and review function continues during the Coronavirus pandemic. In order to reduce the potential of transmission, TRCA requests that development planning and permit applications and materials be submitted digitally in PDF format. Paper submissions are discouraged and may result in extended timeframes for review. We thank you for your cooperation as we respond to the current situation.



January 12, 2021

Ms. Chun Chu
Senior Planner
Planning and Infrastructure Services
City of Richmond Hill

Dear Ms. Chu,

RE: Official Plan Amendment 23 - Additional Residential Unit

The York Catholic District School Board and the York Region District School Board appreciate the opportunity to comment on Official Plan Amendment 23 to the City of Richmond Hill's Official Plan, and have the following comments.

At this time, the School Boards are not able to determine definitively the scale of impact that may arise from additional residential units permitted in the context of OPA 23 as there is limited data available in regards to the prevalence and location of such units and resulting changes to pupil generation.

Any additional dwelling unit will have the potential to generate students. There is the possibility that additional residential units created as a result of OPA 23 may result in potential realignments of current school catchment areas in areas experiencing high enrolment. Both Boards continuously review projected enrolment for all schools to ensure the adequate provision of pupil places and ensure long term sustainable enrolment at our schools. We do not anticipate any immediate changes to school boundaries or additional school site requirements beyond those we have already identified in growth areas of the City through discussions with city staff on school site requirements as a result of the adoption of OPA 23.

The School Boards will welcome any reports on additional residential units created as a result of OPA 23 in the future should the City implement a mechanism to track such data so that a thorough review on pupil generation can be conducted to determine what impacts OPA 23 may have on school catchment areas and school site requirements going forward.

Regards,

A handwritten signature in black ink, appearing to read "Gilbert Luk".

Gilbert Luk
Manager - Property and System Operations
York Region District School Board

A handwritten signature in blue ink, appearing to read "Adam McDonald".

Adam McDonald
Senior Planner
York Catholic District School Board

December 15, 2020

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

RE: Richmond Hill Secondary Suites and Ancillary Units Consultation

Dear Mayor Barrow,

On behalf of the 57,000 Members of the Toronto Regional Real Estate Board (TRREB), I am writing in support of the City of Richmond Hill considering to amend the Official Plan and the Zoning By-law Amendment to expand permissions for secondary suites and ancillary units for ground-related dwellings, to bring them into conformity with provincial legislative requirements and to facilitate housing diversity.

TRREB's REALTOR® Members work with home buyers and sellers across the GTA every day, including the City of Richmond Hill. As such, they are among the most knowledgeable on housing issues and challenges that face the City and region. In this regard, in recent years, TRREB has emphasized that the most significant challenge facing current home buyers is insufficient supply of housing, and especially mid-density housing options, which is leading to housing affordability.

TRREB has been a long-time supporter of the legalization and facilitation of secondary suites such as basement apartments, and ancillary dwellings such as garden suites or coach houses. Now, more than ever, we believe that these units can help address the housing challenges that we face by making significant contributions to the supply of housing both for home ownership and rental housing.

Regarding home ownership, secondary suites and ancillary units provide an excellent strategy for many people to achieve the dream of home ownership. For some people, generating income by renting a secondary suite or ancillary suite allows them to qualify to purchase a home that they otherwise would not have been able to.

With regard to rental housing, secondary suites and ancillary units provide a readily available option for renters. Furthermore, such units allow more diverse housing types and lifestyles for renters, as well as greater diversity in location of choice.

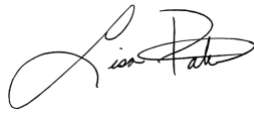
When it comes to mid-density housing, sometimes referred to as "the missing middle", secondary suites and ancillary units can help to fill this gap in a gentle way, without changing the neighbourhood character.

In order for these policies to be effective, have a good adoption rate and add a good supply of affordable housing units, it is imperative for the policies to be clearly communicated, easy to follow, and not financially prohibited. Below are some recommendations that the City could consider as the policy is being reviewed:

- The City should consider creating a “one-stop” Comprehensive Guide or Interactive Web Portal with all necessary information to create these units from scratch (including fire safety standards, Building Codes, inspection info, contact information for all relevant city departments):
 - the interactive online guide should allow users to ask questions about their circumstances and then be directed to further information based on specific requirements (e.g. detached vs. townhouse, secondary suite vs. ancillary unit etc., existing illegal units vs. new ones);
- The City should consider utilizing a live or digital concierge service to assist homeowners through all steps of the process;
- The City should consider flexible options for surface parking requirements based on local needs and realities instead of a blanket, mandatory requirement which can be punitive and limits uptake;
- The City should consider applying the regulations across both new and existing homes;
- The City should consider offering incentives (monetary and non-monetary) to encourage development of “legal” secondary suites and ancillary units; and
- The City should consider promoting the economic benefits of creating legal suites to ensure a good adoption of this policy.

Thank-you for the opportunity to provide our recommendations and we look forward to continue working with the City on this file. TRREB would welcome the opportunity to participate and provide insight when the City considers the proposed rules, requirements and guidelines regulating secondary suites and ancillary units.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Patel". The signature is fluid and cursive, with the first name "Lisa" written in a larger, more prominent script than the last name "Patel".

Lisa Patel
President
CC: Members of Council