

Appendix A to SRPI.22.036
Detailed Comments on the Region of York's
Draft Regional Official Plan

Comments on the Draft Regional Official Plan (December 2021 Version)
Submitted by the City of Richmond Hill

Chapter 1: Introduction and Purpose

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|----------|--|--------|
| n/a | The list should also acknowledge that Centres and Corridors be recognized as places that support a substantial amount of employment uses, i.e. population serving and office jobs. | 9 |
| n/a | There are some inconsistencies between second last paragraph on page 6 (Section 1.1) and paragraph 3 on this page (page 10) and the figure at the bottom of the page that should be rectified. | 10 |

Chapter 2: The Foundation for Complete Communities

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| preamble | Paragraph 3 states "Guided by this overall planning vision..." however the preceding paragraphs do not seem to be providing a "planning vision" - consider clarifying this. | 13 |
| 2.1.4 | Per comments regarding Map 1B - the policy indicates that this map identifies components of the urban system. However, what is shown and described are various areas that are intended to be measured to determine whether policies of the ROP are being appropriately implemented by tracking the density of development or how the area is intensifying. To minimize confusion, this policy and mapping should be clarified. (See also comment re: Policy 2.1.4 (b) and d and e) | 14 |
| 2.1.4. d and e | Is there consideration to combine sub points d) and e) to recognize the overlap between MTSAs and Regional Centres and Corridors rather than identifying these as separate components? | 14 |
| 2.1.5 | This policy does not make mention of other relevant Provincial Plans that have land use planning implications for the Region, such as: Lake Simcoe Protection Plan, Parkway Belt West Plan, and it also does not make reference to the Growth Plan Natural Heritage System. | 14 |

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| page 14 and others | While the November 25th version of the ROP includes changes with respect to the intensification target (50% between 2021 and 2041, and 55% between 2041 and 2051) - these changes have not been made to all sections of the ROP. Please review and update accordingly. | 14 |
| 2.2.5 | Is there, or should there be, any prioritization for the principles? | 16 |
| 2.2.17 | "2.2.17 To work with development proponents on alternative infrastructure initiatives to reduce financial risk to the Region." It would be helpful if the Region explained in the policy or definition what are 'alternative infrastructure initiatives'. | 17 |
| 2.2.8 | For clause (d), would recommend rewording to "protection and enhancement of the Regional Greenlands system and agricultural areas" given that other parts of the ROP references the protection and enhancement of the Regional Greenlands system. This provides consistency. | 17 |
| 2.3.2 | Policy 2.3.2 should also speak to communities being planned in a manner that is sensitive to existing context. | 18 |
| 2.3 | The concept of "15 minute communities" is introduced with a graphic in Section 2.3 Supporting Complete Communities, but while the policies in this section speak generally to walkable and complete communities, none of the policies actually specifically reference the benchmark / concept of a 15 minute walk. The first reference is actually 60 pages later into the document, within policy 4.4.7. | 19 |
| 2.3.9 | Our local OP policies already support this. At this point, it should be less about what municipalities should be doing, and more about encouraging private development proponents to provide access and to develop healthy and locally grown food and agricultural products. | 19 |
| 2.3.13 | This policy should be reframed so that the term "communities" is replaced with "development". So it reads: "That development shall be designed..." | 20 |
| 2.3.16 | Replace the term "communities" with "development". Proponents of development should be designing their site-specific developments to prioritize active transportation through this policy, not communities - this is how communities will evolve to become walkable locations where the movement of people is prioritized. | 21 |

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| 2.3.19 | May want to consider adding "where appropriate" language to 2.3.19 a) as maximum parking provisions are not always appropriate. We have had issues with maximum parking requirements when changes of use occur and a commercial unit previously operating as a medical clinic with a higher parking requirement changes over to a retail location that requires less parking and creates a situation of non-compliance. | 22 |
| 2.3.1.6 | Edit lead in sentence: "To encourage and work with local municipalities, ...". Given that certain financial powers are limited to the Region under a two-tier system, the Region may need/could be involved in programs related to financial incentives (e.g., Local Improvement Charge/PACE programs for building energy retrofits as per policy 2.3.1.14). | 23 |
| 2.3.1.9 | Is there a terms of reference for "health, environmental and air quality impact study"? Are they to be provided for all development applications? Note: it is not referenced in Section 7.3.11. | 23 |
| 2.3.1.10 | Is there a minimum distance from "known air emissions sources" that we should apply to determine when studies need to be requested regarding mitigation? | 24 |
| 2.3.1.13 | Are there corresponding buffer policies that support this policy regarding stormwater management? | 24 |
| 2.3.1.16 | Periodic updates to sustainable development programs should also aim to achieve: "climate equity targeting areas experiencing higher rates of energy poverty, urban canopy deficiency and limited transportation options". | 24 |
| 2.3.1.16 | Update text to include alternative and district energy. E.g., "That York Region and local municipalities develop, implement and periodically update sustainable development programs to achieve: d. increase in the use of alternative and renewable energy generation options and district energy systems;" | 24 |
| 2.3.2.2 and 2.3.2.3 | It would be appreciated if wording could be added to clarify the responsibility of individual development applications in contributing to achieving these targets. (See recommendation in Staff Report SRPI.22.036) | 26 |
| 2.3.2.2 and 2.3.2.3 | The requirement for affordable housing should also include the requirement that these units vary in range of sizes so that they are able to accommodate families and larger households. | 26 |

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| Table 2 | The targets should be noted as "minimum" in the table. | 26 |
| 2.3.2.6 | The City's Affordable Housing Strategy proposes that the threshold for lifting the prohibition on demolition of rental housing should be a vacancy rate of 3% or more over three consecutive years for greater certainty that the rental housing market is indeed meeting the needs of residents prior to permitting a demolition/conversion where a reduction in supply results. | 27 |
| 2.4.1 | Policies 2.4.1.1(c), (d), and (e) uses "encourage" for consultation with Indigenous communities when archaeological resources are found to be Indigenous in origin. But, the Provincial Policy Statement 2020 has stronger language and requires engagement with Indigenous communities for identifying and managing Indigenous cultural and archaeological resources (Policy 2.6.5). Consider using the word "shall" instead in the ROP. | 33 |
| 2.5.1 and 2.5.2 | <p>The ROP directs the development of an excess soil reuses strategy and the incorporation of best management practices for excess soil to local municipalities. The Region may want to coordinate the development of such strategies and best management practices across all nine municipalities in order to create consistent practices across municipalities, including fines for illegal placement, amount of excess soils that can be placed or distributed, and mapping of potential areas for storage / prohibition of storage of excess soil.</p> <p>This policy was taken from section 3.4.2 (7) of the Greenbelt Plan. While 2.4.2 (d) of this policy notes "Fill quality received and fill placement at a site will not cause an adverse effect with regard to the current or proposed use of the property or the natural environment, and is compatible with adjacent land uses", this policy should clearly state that placement of excess soil should be located outside of the Key Natural Heritage Features and Key Hydrologic Features, plus their associated buffers.</p> | 36 |

Chapter 3: A Sustainable Natural Environment

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| 3.1.3 | It is unclear what is meant by "establish" where it reads: "... official plans shall identify and include policies to establish and protect the Regional Greenlands System and Water Resource System from development and site alteration" Do you mean "delineate" Regional Greenlands System and Water Resource Systems based on the mapping: Maps 2, 4, 7, 12A and 12B ? | 39 |
| 3.1.6 | In line with the overall goal of Section 3, and the specific objective for 3.1, this policy should include restore or enhance linkages, in addition to maintain them and their related functions. | 39 |
| 3.1.1 | To implement watershed policies, the ROP should provide mapping that identifies the watersheds and sub-watersheds that have a plan and any that may not, so that it is clear what to refer to when making a planning application and also to understand the scale at which these plans should be developed. It would also be helpful to recognize Conservation Authorities for their role in developing, monitoring and implementing these plans. | 41 |
| 3.1.1.2(d) | Should the watershed planning policies also "protect, improve and restore" key hydrologic areas and their functions? | 41 |
| 3.2.5 (c/d) | Stormwater management facilities are infrastructure, and should be treated as such, recommend moving stormwater management systems/facilities from subclause (c) to subclause (d) (with new infrastructure), that way it is also subject to subclause (i) no other reasonable alternative exists and if an approved EIS demonstrates that it can be constructed without negative impacts ..." Subclause (c) would pertain only to passive recreation. | 43 |
| 3.2.5 (e) | What is a "linear valley"? Are these hazard lands? | 43 |

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| 3.2.5.c | Within Chapter 3, passive recreational uses are associated with both "non-motorized trails" (3.2.5.c) and "trails" (3.4.12) in the document, as well as with the development of a regional trails network that connects to the Regional Cycling network (3.2.8), which in part (on-road dedicated facilities) permits motorized bicycles (e-bikes). Suggestion that the use of "non-motorized trails" within the definition of "Passive Recreational Uses" may be incongruent with emerging consideration and regulation of the full spectrum of micromobility devices at local levels. Some motorized uses are likely to be permitted on these trail systems (e.g., e-bikes). | 43 |
| 3.2.7 | Suggest including wording that would allow land trusts and conservation authorities to perform land severances for the purpose of land acquisition and protecting lands in perpetuity. This was brought up at the York Region Land Securement Working group by several organizations, and would be in alignment with the York Region Greening Strategy. | 43 |
| 3.3.5 | Please clarify that this policy regarding comprehensive master environmental servicing plans can apply on a city-wide basis in addition to Secondary Plan areas. | 45 |
| 3.3.6 | This water budget policy should indicate the outcome it is seeking - e.g. no negative impact (?) | 45 |
| 3.3.9 | This policy should indicate the outcome it is seeking - to what level must these Best Management Practices aspire? | 46 |
| 3.4.10 | This policy exempts proponents of buildings or structures related to agriculture from preparing an Environmental Impact Study (EIS), however, won't they need to prepare an EIS to identify the feature and its boundary to then create a 30m buffer? As such, perhaps the policy can indicate that they are exempt from having to identify impacts of proposed development on the feature. | 50 |
| 3.4.12 | Trails should avoid Key Natural Heritage Features (KNHF) and Key Hydrologic Features (KHF). The Natural Heritage Reference Manual suggests trails (suitably designed) can be within buffers; however, the purpose and intent of the buffer (i.e., to protect the KNHF/KHF) should not be undermined by the provision of the trail. Regarding the need for an EIS, it should also demonstrate that the construction/development of a trail will not result in a negative impacts, not just the future uses of the trail. | 50 |

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| 3.4.9 | This policy (and others) appear to make reference to an Environmental Impact Study (EIS), in replacement for a Natural Heritage Evaluation (NHE) which is the current terminology used in the City's Official Plan. Is there a difference between an EIS and NHE, or are they interchangeable? We note that Policy 6.4.8 of the draft ROP references a Natural Heritage Evaluation, but it is not defined. | 50 |
| 3.4.1 | Recommend making the goal: "no loss of wetland". The current wording: "no net loss" is in conflict with provincial policy that requires protection of significant wetlands and all wetlands within the provincial natural heritage systems. | 55 |
| 3.4.2.6 | This policy does not provide reference to the criteria for woodlands located on the Oak Ridges Moraine (ORM) or Greenbelt. As it is a carry forward from the current ROP, the additional sub-policies (e) to (g) which address significance for woodlands on the ORM, in the Greenbelt Natural Heritage System (NHS) and in the Lake Simcoe watershed outside of the Greenbelt NHS, ORM and settlement areas. | 57 |
| NEW Policy requested (Policy 2.2.29 From the 2010 ROP) | <p>We request that the following policy (2.2.29) from the 2010 ROP not be deleted as Technical papers associated with the ORMCP, Lake Simcoe Protection Plan and the Greenbelt Plan are being used and referenced.</p> <p>Please re-state the policy to read:</p> <p>"That the technical papers associated with the Oak Ridges Moraine Conservation Plan, Lake Simcoe Protection Plan and the Greenbelt Plan be consulted to provide clarification in implementing the policies related to key natural heritage features and key hydrologic features within the Provincial Plans."</p> | new |

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| NEW Policy requested (Policy 2.3.31 from the 2010 ROP) | Policy 2.3.31 from the 2010 ROP should not be deleted: "To work with the conservation authorities and local municipalities to identify remediation and mitigation opportunities for hazardous lands and hazardous sites." It is important that the commitment to partnerships in this regard is formalized in this regard as the CAs and municipalities have different roles and tools that can be used for the protection and enhancement of these areas. | new |

Chapter 4: An Urbanizing Region

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| 4.1.1 (c) | It would be helpful to clarify that the "overlay" reference to Map 1B is a means to measure where targets are set - these are 'monitoring' areas - more so than land use. Map 1B also is important with respect to phasing of development - it ties in with policy 4.2.2.4 which requires a population of 1.5 million before a secondary plan related to new community areas can be approved. | 64 |
| 4.1.2 | <p>The last sentence states: "The intent of Map 1B is provide further policy direction for where higher levels of intensification are to be promoted and how the Urban System is to be phased and developed in the long term."</p> <p>In this sentence, insert the word "to" between "provide" and "further", and suggest that you change the word "promoted" to "directed".</p> <p>The policies of the ROP are necessary to provide direction for intensification for local municipalities and for proponents of development.</p> | 64 |

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| 4.2.1.8 (b) | Add active transportation to: b. a transit plan is completed in consultation with York Region Transit, which identifies transit routes and corridors, co-ordinates transit with land use patterns and active transportation; and ensures the ability to integrate transit into the community; | 70 |
| 4.2.1.8 (g) | This policy speaks to a 'reduced' parking standard, however it does not indicate from what it is reduced. It should be clarified. | 70 |
| 4.2.1.9 | This policy makes reference to "future transit corridors", however it is unclear what corridors are being referred to, either in this ROP, provincial Plan or other legislation. We note that Map 10 does not explicitly illustrate any "future" transit corridors. | 70 |
| 4.2.2.4 | Please clarify what is meant by "early stage" in the text at the bottom of page 72 with respect to service delivery in new communities. | 72 |
| 4.3.8 | Please clarify what would be considered to be a "complementary employment use". | 74 |
| 4.3.14 | e) stipulates that other uses in employment areas where individuals reside on a temporary or permanent basis are not permitted in employment areas. Interpretation of this policy could suggest that hotels are included in this, despite hotels being commonplace in many employment areas across York Region. It is unclear whether this is in fact a policy direction the Region is introducing (i.e., limiting hotels within employment areas). If that is not the case, then it suggested that the words "not including hotels or equivalent" be included in the policy. | 75 |
| 4.3.15 | Please clarify what is an "accessory institutional use" in the context of this policy. | 75 |
| 4.4 | This section makes reference to "strategic growth areas" (SGA) as they are listed in Policy 4.1.3 (a). However, the definition for Strategic Growth Area provided in Section 7 is much broader than what is provided in the list in policy 4.1.3 (a). As such, either the definition for SGA should change, or this term should not be used in relation to many of the policies in Section 4.4. | 77 |
| 4.4.4 | The scale of development needs to be in accordance with local context and in a form that will meet or exceed the minimum density target, as opposed to "reflecting the intensification hierarchy" which only speaks to where the majority of development is expected to be directed in accordance with policy 4.1.3. | 78 |

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| 4.4.8 | This policy should clarify that larger family type units are encouraged within multi-unit buildings. | 78 |
| 4.4.12 | The reference to hierarchy is not correct, as there is considerable variation in terms of potential buildout of the areas within the individual tiers of the hierarchy, even among the four Urban Growth Centres, let alone the 78 MTSA's. It may be more appropriate to state that density and height targets shall be established to implement the Regional minimum targets and also in accordance with local context and available or planned infrastructure to support growth and development. | 79 |
| 4.4.15 | Note that Map 10 does not identify "future rapid transit corridors." Also, the policy directs to plan for "higher density" development, but does not say higher than what. Perhaps this could be reworded to direct planning for future development that is commensurate with the planned transit for the area? | 79 |
| 4.4.16 | The term "missing middle" is used in this policy. In the Richmond Hill Key Directions Report we consider triplex, quadraplex, townhouses and walk-up apartment buildings to be "missing middle." However, these building types are listed in the ROP's definition of low-density. The definition of "missing middle" is quite vague - but seems to allude to mid-rise multi-unit development. As such, it may be more easily understood if the policies simply referred to the term "mid-rise development", rather than "missing middle." | 79 |
| 4.4.22 | This policy maybe directing major office too far afield when it suggests that it be directed to (non-MTSA) Local Centres and Corridors. | 80 |
| 4.4.26 | Similar to Policy 4.2.1.6, there needs to be a similar policy requiring secondary plans and planning applications in strategic growth areas to demonstrate how development conforms to local municipal community energy plans as well as the Region's Energy Conservation and Demand Management Plan. By doing so we create opportunities to incorporate renewable/ alternative/ district energy/ local generation systems where they are most feasible (i.e., Regional Centres, many MTSA's and even within some employment areas). | 80 |
| 4.4.26 (I) | This policy speaks to public benefits through both private and public development and may be better presented through two separate policies. | 81 |

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| 4.4.1 | <p>In the preamble to this policy section it states that second to Regional Centres and Subway Station MTSA's, all of the other MTSA's will have higher density and scale than Local Centres. However, the MTSA's vary across the City and Region. In Richmond Hill we have MTSA's that are UGC and KDAs as well as one that is partly located in a hamlet. Some of these MTSA's may have higher density than a local centre and some will not. The language in this section needs to be mindful of the extreme variation among these MTSA's. Accordingly, the intensification hierarchy needs to recognize the local context in terms of expectations for density of development over the long-term, from one growth area to the other. Furthermore, it would be helpful to indicate that this hierarchy is about prioritizing where growth should go, thereby indicating that priority of growth goes to the build out of those areas at the top of the hierarchy, which also helps to inform when and where Regional infrastructure planning over the 2051 planning horizon. To that end, there are several policy tweaks that should occur. Starting with this policy. It should read as: "That growth and development be directed to in accordance with the Regional intensification hierarchy outlined in policy 4.1.3...."</p> | 82 |
| 4.4.1.5 | <p>Suggest restructuring the policy to encourage/direct these uses to locate in the Regional Centres, and then advocate for subsidies to encourage their location. Or alternatively, major office and institutional uses could be explicitly noted in Policy 4.4.1.6.</p> | 83 |
| 4.4.2 Preamble | <p>5th Paragraph, where it states: "Each MTSA is unique with its own growth potential and will be planned based on local context and conditions to support and enhance the Regional intensification hierarchy."</p> <p>In addition to this being stated in the preamble, this should be its own policy in Section 4.4.2 to give it more weight. It is important that Council, local municipalities and proponents of development understand that each MTSA is unique, and will not be planned homogeneously. This means that density will vary across each, and the MTSA designation does not and should not signify density is the only important factor when planning for MTSA's.</p> | 84 |

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| 4.4.2.1 (c) | Does the Region expect that the whole of the MTSAs will be in the Regional Corridor designation of the lower-tier municipal Official Plans? This is not what was proposed when we worked to delineate them, as some included Neighbourhood areas that could support medium density development, such as townhouses. | 85 |
| 4.4.2.10 | This policy speaks to MTSAs that are not yet "Protected", however, there are no policies that speak to the balance of the MTSAs being "protected", nor is there any indication of what is meant by that "label." It is acknowledged that the definition of MTSA states that most are "protected", but it does not make reference to the Planning Act and it gives no indication of what is meant by stating it is 'protected.' | 86 |
| 4.4.2.8 | Consider qualifying that the delineation of MTSAs as required in this policy is for monitoring purposes (since these areas could have more than one land use designation). | 86 |
| 4.4.23 and 4.4.2.9(j) | These two policies should specify that a proportion of the affordable units should be 3-bedroom or larger units in order to accommodate larger households. The current draft policies are too generic when referring to "a range of compact housing forms and tenures". | 80, 86 |
| general language | Some policies in the ROP talk about "best efforts" while others speak to "encourage"; and even further, some speak to "best efforts to encourage" (Policy 4.5.4(e)). Please clarify how will lower-tier municipalities implement these standards. | n/a |

Chapter 5: Supporting for Agricultural System

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| 5.1.7 | How is Policy 5.1.7 different from Policy 5.1.8 regarding new non-agricultural uses? | 95 |
| 5.1.12 | This policy regarding lot creation defers to the Provincial Plans, this can be challenging for implementation. It would be better to provide the applicable policy directly in the ROP. Also, it is noted that Policy 5.2.6 does provide re: Prime Agricultural Land lot creation. How do these two policies correspond with each other? | 96 |

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| 5.3.2 (c) | Having unserviced parks and major recreational uses both permitted in the same sub-policy seems contradictory. There are many more caveats with respect to major recreation, it should be listed on its own with recognition of subject to meeting other policy requirements. | 100 |
| 5.3.5 | Why is the rural lot creation policy defaulting to consent permissions for lands within the Prime Agricultural Area? | 101 |
| 5.4.6 | Suggest inserting the words "subject to applicable Provincial Plans" before the words "local official plan consent policies" because the Gormley Hamlet in Richmond Hill is also subject to the policies of the ORMCP and the applicable lot creation policies set out in that Plan. | 102 |
| 5.5.11 | Why is a zoning by-law amendment required for portable asphalt plants in Policy 5.5.11? And what does this policy have to do with petroleum (as it references Policy 5.5.21)? | 104 |
| 5.5.15 | How is this policy intended to be implemented? While it may direct public (municipal) developments, how would the policy be implemented for private ones in terms of recovering and recycling manufactured materials? | 105 |
| 5.5.18 | The ROP defers to provincial plans for details regarding proper extraction and rehabilitation of sites of mineral aggregate operations and wayside pits. This is not a user-friendly way to provide directions for land use. The ROP should give details on the policies of the provincial plans. | 105 |
| 5.5.7 and 5.5.20 | Policies 5.5.7 and 5.5.20 seem to be saying the same thing - do they apply to different areas within the Provincial plans? | 104, 105 |

Chapter 6: Servicing our Communities

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| Preamble | Move away from "alternative" or "other" language when describing low-carbon mobility options, as it situates them subconsciously within the dominant car-centric transportation paradigm. Consider "more sustainable" (also used on page 112) or "low carbon" in this case, as the previous sentence references climate change. Possible use of "sustainable modes" as this document outlines at the bottom of page 109. We suggest that the Region review this and make changes where applicable, throughout the document. | 107 |

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| Throughout ROP in multiple chapters | We suggest to embed micromobility more prominently and define it within this policy. Micromobility is referenced within this document, and it should be recognized alongside other low-carbon modes. The City's draft TMP Update mobility hierarchy recognizes Micromobility as electrified versions of active transportation modes, such as e-scooters, e-bikes, and cargo e-bikes. | 107 |
| 6.1.1 | "...addressing impacts of a changing climate..." this phrasing makes it sound like transportation is primarily focused on climate adaptation. Could the sentence also make it clear that transportation is key to climate mitigation? | 109 |
| 6.1.1.1 | The Region may want to use the term "sustainable mobility measures" in order to capture micromobility in this policy. Also, shouldn't the Region's Transportation Master Plan be mentioned here? And also an acknowledgement of the Region's role as the transit authority? | 109 |
| 6.1.1.3 | Please elaborate how the proponent would fulfill this policy; the current wording is too broad. Also, consider adding the words: "to the satisfaction of the Region" at the end of this policy. | 109 |
| 6.1.1.6 | There should be a new policy introduced after Policy 6.1.1.6 that requires development in the Urban Area or Regional Centres, Regional Corridors and/or MTSAs to demonstrate how the proposed development is designed to support the achievement of an overall modal split of 30% during rush hour in the Urban Area and 50% in the Regional Centres, Regional Corridors and MTSAs during rush hour by 2051. Policy 6.1.1.6 as currently worded does not translate into requirements for development, and it should. | 109 |
| 6.2.3 | What does Policy 6.2.3(d) mean? Are there specific policies that this is referencing? Request to make the language more clear and simple. | 111 |
| 6.3.2.5 | How would this preferential treatment of transit align with accommodation of cyclists and micromobility users? Suggestion to acknowledge this within policy. | 115 |

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| 6.3.2.7 | <p>Suggest making this language less prescriptive, in part due to potential for different design solutions, and in part for the potential for duplication of necessary infrastructure (e.g., multi-use paths and sidewalks), and lastly, to align with other policies that are more flexible (e.g., Policy 6.3.3.1). Also, add possible use of "active transportation facilities."</p> <p>The policy should be more open-ended to not just be limited to multi-use paths, but also include other types of cycling facilities.</p> | 116 |
| 6.3.3.4 | The typical rapid transit corridor cross-section should also include in-boulevard bike lane options. | 118 |
| 6.3.3.5 | Policy 6.3.3.5 speaks to 6-lane Regional streets, however Map 11 provides streets with varying widths; is there a way that these can be reconciled? | 118 |
| 6.3.3.27 | Policy 6.3.3.27 seems to conflict with policies in Section 3 which requires "no alternative test" for infrastructure; should reconcile these policies as it relates to Key Natural Heritage Features and Key Hydrologic Features. | 120 |
| 6.3.5.5 | Please clarify this policy further. The terms "vicinity" is too general. Does this mean 150m, 250m, 500 metres within the "vicinity" of the airport? or would 5km away still be considered "vicinity". If you were to apply Airport Zoning Regulations, the "Outer Surface Area" alone extends several kilometers out from airport approach surfaces, hence this policy needs to be revised to be more specific. | 123 |
| 6.3.5.6 | Why is policy 6.3.5.6 only limited to the Pickering Airport? The Provincial Policy Statement about airports also speaks to Noise Exposure Forecast / Noise Exposure Projection contours; why are those policies not addressed in the ROP? | 123 |
| 6.4.8 | Does this policy need to clarify that the "employment uses" that are referred here need to be occurring within the settlement area? | 125 |

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| 6.4.8 (e) | <p>This is the only policy that references "Natural Heritage Evaluation" (NHE) while the remaining draft ROP consistently references and defines "Environmental Impact Study" (EIS). It is recommended that the ROP uses and defines "Natural Heritage Evaluation" to be consistent with the ORMCP, Greenbelt Plan, and Richmond Hill Official Plan instead of "Environmental Impact Statement".</p> <p>Otherwise, the NHE should be defined in this section, as are other studies, to identify the difference for proponents and reviewers.</p> | 125 |
| 6.5.4 and 6.5.5 | It seems that these policies should be rolled into the other Master Environmental Servicing Plan policies of the ROP to minimize repetition and avoid loss of information. | 131 |
| 6.5.6 | What is intended by the policy? Typically, after development the developer is no longer responsible for the property. Is the policy suggesting that the proponent be responsible in perpetuity or is it intended that the stormwater management works be designed to municipal standards that take into consideration long-term maintenance and cost effectiveness? | 131 |
| 6.7.10 | In addition to design, it might be prudent to consider the phasing and expansion of on-site renewable/alternative energy infrastructure and future connections to coincide with the phasing of development blocks and other servicing infrastructure. | 135 |

Chapter 7: Implementation of the Official Plan

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| 7.2 Figure | This figure provides a partial list of targets to monitor - what about the modal split, affordable housing, intensification, and greenhouse gas reduction emissions? Consider adding population too in support of the phasing policies related to complete communities. | 139 |

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| 7.3.7 | Although (d) provides flexibility to include other matters specified under the Planning Act, it should reflect the most recent update which is supported by further policy direction under the Provincial Policy Statement and Growth Plan on climate resiliency. Suggested edit to include: "sustainable buildings (or development) designed to mitigate greenhouse gas emissions and adapt to changing climate". | 141 |
| 7.3.8 | <p>Included in the list of matters that are not eligible to be exempt from Regional approval should be:</p> <ul style="list-style-type: none"> -Request for employment conversion (should a lower-tier municipality permit it) -Application seeking to permit higher or lower density than what is permitted in an MTSA (should a lower-tier municipality permit it) -Approval of new or changes to Special Policy Areas -Official plan amendments that are pursuant to Section 26 of the Planning Act <p>Also, what is considered to be "major secondary plan"?</p> | 141 |
| 7.3.11 | <p>The requirement for an Affordable Housing Contribution Plan needs clarification as to what that is and should only apply to applications where housing is proposed.</p> <p>The requirement for an Archeological assessment should only apply where archeological artifacts are likely to be found (i.e., in accordance with the Region's and/or local Archeological master plans).</p> <p>Agricultural Impact Assessments should be required with a certain/defined distance of an agricultural area.</p> <p>Several policies of the ROP call for Master Environmental Servicing Study, yet it is not provided in the table - should it be?</p> | 142 |

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| 7.3.11 | Consider adding to Table 7: -Stormwater management plan -Excess soil management plan (where major site alteration/excavation is proposed) -Site-specific wildland fire assessment where applicable -Reference (or at least a placeholder) to demonstrating conformity/implementation of the future Community Energy & Emissions Plan. -Source water impact assessment and mitigation plan for development within Significant Groundwater Recharge Areas, particularly if there is storage & handling of organic solvent and Dense Non-Aqueous Phase Liquid (DNAPL) | 142 |
| 7.4.5 | What is the difference between policies a) and b)? | 144 |
| 7.4.7 | Please note that the only maps that identify the Parkway Belt West Plan are those in Appendix 2, and these maps do not include an "underlying land use designation." | 144 |

Draft Definitions

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| Accessory | The term "accessory" is referenced throughout the policies of the ROP, but a corresponding definition does not appear to be included in the definitions section. A definition should be provided. | new |
| Affordable | To ensure that appropriate affordable housing is provided, and to meet objective of providing affordable housing to larger households, the definition of "affordable" should be expanded to capture core housing need (e.g., housing that is "suitable" and "in good repair.") | 147 |

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| Agricultural Area | In the definition of Agriculture, the term "prime" should be explained because this term is referenced throughout the ROP, including within the definition of "rural area". Alternatively, the term "prime agricultural area" may be added as a new definition in the ROP. (Prime are areas where Canada Land Inventory class 1-3 agricultural lands predominate) | 147 |
| Built-Up Area | The definition for Built-Up Area could be clearer. | 149 |
| Community Area | The Community Area definition does not correspond with Map 1A, given that the definition seems to say that these areas include employment areas. Consider refining the definition to coincide with Map 1A. | 150 |
| Community Hub | Why is "or accessed through a digital service" in the definition - how would this be addressed via land use planning? | 150 |
| Core Employment Areas | Item (ii) of the definition for Core Employment states: "Adjacent to, or in proximity to,..." Shouldn't it be referring to where there is planned or existing employment uses that are not compatible with non-employment uses? | 151 |
| Core Employment Areas | Item (iii) "Not appropriate for more flexible employment uses" is rather vague. Not sure exactly what this is supposed to mean. | 151 |
| Definitions | Consider providing clarifying definitions for climate terminology used in the policies (e.g., mitigation, adaptation, and resiliency) - similar to how the Provincial Policy Statement defines its policy reference to "impacts of a changing climate". It will help set the tone and provide consistency for the local municipal official plans as they too incorporate climate change into their policies. | new |
| Designated Greenfield Area | There is an italicized term ("designated area") in the definition of Designated Greenfield Area that is not defined. The definition of DGA makes reference to the Provincial Built Boundary paper which is helpful, but the Region's definition must also account for new DGA that has come on stream since 2006 via ROPAs 1, 2, and 3, as well as through the proposed ROP. | 151 |

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| Gentle Density | <p>The definition for Gentle Density is very vague. For the Region's consideration, in the City's Key Directions Report, we define it as follows: "forms of development that can be accommodated through new lot creation within an existing community and/or when "missing middle" housing is introduced to an area where single and/or semi-detached housing is prevalent, in a manner that is contextually appropriate and desirable. Gentle density can also introduce non-residential development into a predominantly residential area through the provision of modest neighbourhood-serving commercial, cultural, institutional, and recreational uses. Further to that, "missing middle" is defined as: "modest multi-unit housing in forms such as duplex, triplex, walk-up apartments and live-work units."</p> <p>Also, the term "single family" is generally an antiquated planning term as it speaks to kinship vis-a-vis land use. Suggest it be replaced with "single-detached" dwelling.</p> | 154 |
| Medium Density | <p>Medium density is not defined, but is referenced in the definition of "missing middle". It might be more helpful if the Region simply stated in its policies what it is looking for along Regional Roads. For instance, in policy 4.4.16, it would be more clear to simply state that local municipalities identify locations along Regional arterial roads and other main streets where townhouse development can be accommodated.</p> | new |
| Missing Middle | <p>The term "missing middle" is not well defined. The definition uses the term "medium density" which is also not defined. What housing types (other than "medium density") would typically classify as "missing middle"? Where on the spectrum of housing options would this lie? How is it beneficial to have this definition?</p> <p>When looking at the definition of "low-density residential," which includes a range of housing types that include duplex, triples, and townhouses, one could surmise that "missing middle" or medium density includes a range of apartment style development starting from walk-ups, but it is not clear beyond that.</p> | 159 |

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| Natural Heritage Evaluation & other studies | Natural Heritage Evaluation and all other studies referenced in the ROP should be defined. | new |
| New Community Areas | The definition of "New Community Area" is not consistent with ROP policies and mapping. "New Community Areas" have been added to the ROP since the adoption and approval of ROPAs 1, 2, and 3 in 2010. | 160 |
| Secondary Plan | For clarity, it would be helpful to define "secondary plan" as per the Planning Act: 17 (2.1.2) For the purpose of subsection (2.1.1), a secondary plan is a part of an official plan, added by way of an amendment, that contains policies and land use designations that apply to multiple contiguous parcels of land, but not an entire municipality, and that provides more detailed land use policy direction in respect of those parcels than was provided before the amendment. 2017, c. 23, Sched. 3, s. 8 (1). | 162 |
| Strategic Growth Area | The definition of "Strategic Growth Area" is much broader than what is listed in the policy for intensification hierarchy. Please reconcile the definition with the policy. The policy definition is more appropriate given the way the term is used in the policies of the ROP. | 164 |
| Subwatershed | This term would be more easily understood if the Region identified the watersheds and subwatershed on a map. Also, would it be appropriate to recognize the Conservation Authorities as the author of these plans? | 164 |
| Supporting Employment Area | In the definition of "Supporting Employment Area", why is "knowledge based uses" singled out in item (b)? Shouldn't it say "office uses"? | 164 |
| Transit-Supportive | The definition for "Transit-Supportive" states: Transit-supportive development will be consistent with Ontario's Transit Supportive Guidelines. This reads like a policy. What is intended by making that statement in the definition? | 165 |

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| Watershed Planning | The definition of "watershed planning" seems very close to that of "subwatershed plan." It would seem that watershed planning is the act of preparing a watershed plan. Consider creating a definition for a watershed plan and ensure there is clarity in terms of what it is in relation to a subwatershed plan. It seems that the sub-watershed plan may take the high-level information from a watershed plan and provide much greater detail for a smaller area. But, as it is now, there is not a lot of clarity on this. | 166 |

Draft Maps

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| Map 1A | Only one of the areas designated as Office in the North Leslie Secondary Plan is shown as Employment, the lands adjacent to the 404 that are mid-block should also be identified as Employment on Map 1A. | 170 |
| Map 1B | As per comments regarding the use of the term "overlay" in Section 2.0, the Region should consider calling this something like the "Urban System Target Areas" or "Urban System Monitoring" and use this for monitoring purposes. | 171 |
| Map 1B | Policy 4.4.2.4 refers to protected MTSAs in Map 1B, but the map itself doesn't identify the MTSAs as "protected". To provide clarity, please indicate "Protected MTSAs" in addition to "MTSAs" on the legend of the map, as we understand that there are also MTSAs that are not protected. | 171 |
| Map 1C | The Parkway Belt West Plan (PBWP) could be identified on this map as well. This is necessary since the ROP defers to the policies of the PBWP. Furthermore, it is noted that the Greenbelt Urban River Valleys are identified on this map, but there is no policy provided in relation to them. Perhaps the Region could consider indicating that when it comes to enhancement areas for the Greenlands System, public acquisition of these lands could be prioritized? | 172 |

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| Map 3 | Because the policies related to life science areas of natural and scientific interest (ANSI) are dependent on whether or not the ANSI is in the provincial Natural Heritage System (NHS), it would be helpful to also include the NHS overlay on this map. | 174 |
| Map 9A | The Recreational Trail Network should remove the proposed segment of the Lake to Lake Cycling Route and Walking Trail on the east Rouge tributary south of 19th Avenue, spanning from 19th Avenue to Leslie Street. The proposed segment on the west Rouge tributary should be maintained. | 180 |
| Map 10 | Given recent provincial announcement and the updated Environmental Project Report Addendum for the Yonge North Subway Extension, there should be two subway stations shown for lands within Richmond Hill Centre (i.e. move the "station for further study" symbol). Bathurst Street, from Highway 7 to Major Mackenzie - what is the status of this corridor, given that it was a Special Study Area in the current Regional Official Plan? | 182 |
| Map 10 | It is recommended that the proposed GO Station at Bayview and 19th Avenue be removed and replaced by a proposed GO Station at Elgin Mills and Newkirk to better service residents and business along the Yonge Corridor, the Yonge and Bernard Key Development Area, and the Newkirk Business Park. (See Recommendation in Staff Report SRPI.22.036.) | 182 |
| Figure 1 | Figure 1 identifies the Landform Conservation Area with terms from the ORMCP technical papers - Complex Landform (ORM Category 1) and Moderately Complex Landform (ORM Category 2). However, these terms are not used within the ROP - not specifically within Section 3.4.3, nor defined in the definitions. | 186 |
| Missing Map | As noted in previous comments, mapping that shows watersheds and subwatershed either on their own or integrated with existing maps would help to implement policies of the ROP. | n/a |
| Missing Map | With intensification, greenfield development and employment area conversions, it is important to understand the extent of airport protection areas with respect to noise and flightpaths. It would be very beneficial to include current Noise Exposure Forecast / Noise Exposure Projection contours as well as the regulated area for building height in relation to the Pearson, Buttonville and future Pickering airports. | n/a |