



Village Core Residents
Association
Richmond Hill, ON
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May 17, 2022

Patrick Lee and Sybelle von Kursell
Official Plan Update Committee
City of Richmond Hill
225 East Beaver Creek
Richmond Hill, ON L4B 3P4

Dear Patrick and Sybelle,

Re: Comments on Draft OPA 18.3 and 18.4, City Plan 2041

This letter outlines several comments and concerns that our group has regarding the draft amendments to the Richmond Hill Official Plan, OPA 18.3 and 18.4, dated April 7, 2022. These are the first amendments being proposed following release of the Key Directions report, on which we provided comments previously, and we appreciate the opportunity to have discussed our concerns with your team during our meeting on May 12.

Separate from our comments on the draft OPA themselves, it is our opinion that the format of the draft OPA as circulated for public comment and input do not properly facilitate that purpose. Proposed changes to the OPA itself should be circulated in a “red-lined” format which clearly and quickly indicates proposed wording changes and deletions, without requiring the reader to constantly refer back to the existing wording to understand the context of the change. Further, all PDF documents posted for public review should be “unsecured” so that comments can be added to the document directly; the draft of OPA 18.4 posted to the Richmond Hill website was a *secured* document, making it even more difficult for comments to be provided.

Draft OPA 18.3 – Vision and Urban Structure

Item	Comment
2.2.3.iv	Removing reference to “community vision” in this statement diminishes the importance of community input to the Official Plan.
2.2.4.iii	This reference of “...the City’s on-going transformation to suburban to urban” needs more definition. As a suburb, Richmond Hill relies heavily on its connections to the City of Toronto, but if it evolves into its own independent urban centre, that dependence should decrease. It is currently unclear whether extending the YNSE to Richmond Hill and creating the TOCs and Yonge & Highway 7 as imposed by the Province through recent EMZO will foster such a change, or will rather serve to solidify Richmond Hill’s character a suburb of Toronto.
2.2.4.vi	The inclusion of “authentic” in this statement which includes Richmond Hill Centre destroys its credibility. The statement should be modified to reflect

	only the existing areas that we value and wish to preserve, including the historic Village; Richmond Hill Centre will be completely changed, there will be nothing authentic to preserve.
2.2.4.viii	This item deletes a clause which implied respect for the <i>existing</i> unique character and identity of the City, and replaced it with a clause which suggests that the unique identity of the City is a potential future characteristic that may only come about through City-building. The clause should be re-worked to ensure that respect for the <i>existing</i> character of the City is respected through the City-building process.
2.2.6.i	Similar to 2.2.4.viii, this proposed wording change disrespects existing communities. Further, the wording of the change is misleading, it is meaningless to "... maintain the evolving character of a community ...", the wording should be revised to "maintain the fundamental character of a community as it evolves through growth and development".
2.2.6.ii	We emphatically disagree with the revised statement, "The process of urbanization is used to bring about positive changes to a community." Urbanization does not necessarily equate to positive changes. The word "is" should revert to "can be" as per the current version of the OP.
2.2.6.iii	This item proposed to replace the sentence, "Yet building a new kind of urban also reflects the past and recognizes that Richmond Hill will not become urban overnight" with the sentence, "Yet city building also reflects the past and recognizes that Richmond Hill will grow in its own way". The original intent of the sentence was to recognize that growth must be mindful in its approach and some patience required to ensure that it is done correctly. The proposed new sentence is meaningless and reduces the quality of this vision statement in the OP.
2.2.11.vi	The addition of "medium-density" to characterize Neighbourhoods in general is inaccurate. While there will ultimately be more medium-density infill areas in Neighbourhoods over time, they are envisioned to remain as generally low-density areas for the horizon of this OP (to 2041). Instead, the words "medium-density" could be added to the last sentence, "Opportunities for small-scale medium-density infill development will bring about some change to neighbourhoods as they continue to evolve over time."
2.2.13.i.b	This new clause indicates that if a rental building has a vacancy rate of more than 3% for 3 years it can be replaced by condos. This seems like a very low threshold to trigger a conversion, especially since the protection of existing rental properties to support affordable housing options should be a priority in this OP.
2.2.16.2	Placing a "hold" on development until critical infrastructure is in place or is identified in Capital Plans with a definite timeline for implementation suggests that lands can be zoned or permitted for uses that may not occur for decades, which will inhibit the growth strategy of this OP. Consideration should be given to withholding OP and/or zoning permissions for any lands for which the associated critical infrastructure is not existing or planned. This may help to encourage development to proceed on some lands based on the existing infrastructure in place, rather than owners continually waiting to rationalize increased densities (considered to be one of the major contributing factors to the current housing affordability crisis).
2.2.18.iii, v, and ix	These changes remove the explicit requirements in the OP for development to explore Low-Impact Development (LID) techniques and sustainability options which would enhance our Greenway system. While there may be some requirements in the City's Standards and Specifications Manual, such policy manuals can easily be changed. This section of the OP should explicitly reference the City's Environment Strategy, and in particular the LID techniques outlined therein.

2.2.19.i and ii	These changes dilute the protection of our Greenway system, and removes the requirement for MESP's in conjunction with new Secondary Plans. These changes are contrary to the initiatives in the City's Environment Strategy, which seeks to increase green space within the urban boundary.
2.2.25	Much of the language in the current OP relating to Sustainable Design is removed and replaced with references to the City's Sustainability Assessment Tool, which is not described. A sidebar should be included which not only indicates how the Tool is used, but outlines the key features of the Tool which the OP seeks to promote. This section should also make clear reference to the City's Environment Strategy on Sustainable Land Development, which contains policy that reflects not only the use of the Tool but also other important policies governing sustainability.
2.2.28.xix	High-rise development should not be permitted in the historic Village Local Centre. This should be explicitly qualified in this clause of the OP, as indicated in the following proposed modification (added wording in bold italics), "... and then Local Centres (except for the Village Local Centre). "
2.2.28.xxvi	The addition of the words "To improve wayfinding and navigation" to the start of policy 3.4.1.(25) is inaccurate and misleading. The primary reasons for effective site orientation and view creation are to provide better resonance and connection with the natural and man-made environments, nothing to do with wayfinding. The proposed change to the existing clause should be rejected.
2.2.28.xxxi	This clause uses the phrases "human-scaled" and "urban scaled". There are some guidelines regarding the interpretation of "human-scaled", however it is unknown what "urban scaled" implies. Clarification is required.
2.2.28.xxxix.a	This clause requires editing, particularly parts iv and vi, where the word "design" is used twice in the same sentence.
2.2.28.xliii	The proposed change is for sun/shadow studies to demonstrate that shadowing is "optimized" instead of "achieves adequate sunlight and comfort". It is unclear what performance criteria will be used to "optimize". Clarification is required.
2.2.28.lvi and lvii	<p>These proposed changes to the so-called "angular plane" policies are unacceptable. The angular plane policies are used routinely in the assessment of proposed development applications (concept plans and site plans) to ensure that new development occurring in centres and corridors maintains appropriate setbacks and transitions from existing Neighbourhoods, and is sometimes used also to assess transitions for infill developments that are not within centres or corridors (area-specific angular plane policies applying to certain centres or areas in Chapter 4 of the OP are understood to be maintained).</p> <p>The proposed change introduces a new policy that allows development adjacent to existing Neighbourhood areas to measure the angular plane from <u>10 metres above grade</u> at the common lot line, which would allow for a 3-storey building extending along the entire shared property line (or a 4-storey medium-density building set back only 3 m from the shared property line), greatly affecting privacy and over-shadowing the existing low-density homes. While this policy may be reasonable for another low-density home that is directly adjacent, is it NOT reasonable for a medium- or high-density development which would likely extend along most of the length of the common property line.</p> <p>To ensure built form compatibility and transition of building heights between new medium-density and high-density development in centres and corridors to adjacent Neighbourhoods, the new policy (part lvi.a.ii) should be amended to stipulate that the 45-degree angular plane be <u>measured from</u></p>

	<u>grade at the shared property line</u> , whether there is an intervening roadway or not. This will ensure that new developments incorporate grade-related outdoor areas or other site features between the shared property line and any new building form, which is an appropriate transition to the existing use.
2.2.29.xii	This change removes the requirement to consider making an Urban Square publicly accessible, which raises the question of whether an Urban Square is part of the publicly-accessible urban open space system at all. Clarification is required.
2.2.36	From the wording of this clause, it is unclear how the City will determine which applications are required to submit the form and which are not. Clarification is required.
2.2.37.i	As noted in the text of this item, staggering of amendments may lead to a lack of alignment amongst policies in different sections of the OP. It is unclear why amendments need to be approved before other related pending amendments have been circulated for review and comment. It is preferred that all draft amendments be held for approval until related amendments are available, as larger concepts can sometimes be difficult to understand without specific context.

Draft OPA 18.4 – Neighbourhoods

2.2.2.3	This amendment removes the direction to preserve existing Neighbourhood commercial sites for similar purposes. Removing this clause seems counter to the stated goals of this OPA as it will likely lead to more conversions to residential of these existing commercial sites without necessarily replacing them with mixed-use.
2.2.4.1	The wording of the revised preamble is poor, and should be modified to indicate that new development shall be designed to respect the character and distinguishing features of <i>the surrounding neighbourhood</i> (not just the City's neighbourhoods in general, which does not provide any relevant context). For greater certainty, the last sentence of the prior preamble current proposed for deletion should be maintained: <i>Compatible new development should represent a "good fit" within the physical context and character of the surrounding area.</i>
2.2.4.6	Multi-tached housing options require further public discussion and engagement, including whether such options should be limited to specific areas of the City, and if so, which ones. Further, multi-tached housing should not be unlimited in scope (i.e., number of separate dwelling units must be capped at 3-4), and there would have to be associated increased standards applied for waste handling and for parking in order to ensure that these options do not adversely impact the surrounding single-family residences.
2.2.4.8	This major change to Neighbourhoods in the OP targets the increasing inclusion of medium-density building forms in Priority Infill Areas surrounded by predominantly single-family neighbourhoods. Transitions to adjacent Neighbourhood areas are critical. Accordingly, some of the subjective provisions outlined in item 2.2.5.8 should be further developed and included within this OPA, including minimum setback requirements, maximum height limitations, and/or suitable angular plane restrictions. These considerations should not be deferred to a later OPA.
2.2.4.13.iii	This item adds a new permission for medium-density residential "on a street that is adjacent to an area designated Centre or Corridor ...". This is poorly worded and conceived as it appears to extend such permissions to any street that might run through a centre or corridor along any portion of its

	extent. Clarification is required as to the specific intent of this clause, and it should be re-worded accordingly.
2.2.5.6	Again, this clause facilitates the conversion of existing retail/commercial properties to residential, which appears to be contrary to the preamble suggested in 2.2.5.1.

In the above summary tables, there are several items highlighted which are of particular concern to our group. We would greatly appreciate the opportunity to discuss further any potential modifications that might be considered by your committee prior to putting these OPA forward to Council.

Thank you very much for your consideration, and for the opportunity for continued engagement in the OP Update process.

Warm regards,

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Cc: Mayor David West
 Raika Sheppard, Councillor Ward 4
 Joe DiPaola, Regional & Local Councillor
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