



January 16, 2023

Sarah Mowder
Planner II – Subdivisions
Development Planning Division
Planning and Infrastructure Department
City of Richmond Hill
225 East Beaver Creek Road
Richmond Hill, ON L4B 3P4

Dear Sarah Mowder:

Re: Proposed Official Plan Amendment – First Submission
101 Bloomington Inc.
101 Bloomington Road
City File Nos.: OPA-22-0008 and D02-19020
York Region File Nos.: LOPA.22.R.0069 and ZBA.19.R.0121

This is in response to your circulation and request for comments for the Official Plan Amendment (OPA) and Zoning By-law Amendment applications.

The 0.41 hectares (1.0 ac) subject site is located on the south side of Bloomington Road, west of Yonge Street, and municipally known as 101 Bloomington Road. Proposed is a 12-storey residential building with 153 apartment units, served by 206 parking spaces in a 3-level underground garage. The overall building density is 3.5 FSI.

Regional staff do not have any comments on the site-specific zoning by-law amendment application. The by-law amendment proposes to rezone the subject site to permit a 12-storey apartment building.

Richmond Hill Official Plan and Purpose and Effect of the Proposed Amendment

According to the applicant's Planning Justification report, prepared by Brutto Consulting, dated November 22, 2022, the subject lands are designated by the Richmond Hill Official Plan as "Neighbourhood", with a maximum permitted height of 4 storeys. The proposed 12-storey apartment building is not a permitted use or built form under the "Neighbourhood" designation. On a site specific and through exceptions to the "Neighbourhood" designation, the applicant's draft OPA proposes to permit:

- a high density apartment building

- an increase the maximum permitted height from 4 to 12 storeys
- a density of 3.5 FSI
- a maximum GFA of 13,475.2 m² (145,046 ft²), and
- a maximum building floorplate of 760 m²

Conformity with the 2022 York Region Official Plan

The 2022 York Region Official Plan (ROP) contains policies that guide economic, environmental and community building decisions to manage growth. These policies strengthen the connections between the natural and built environment, job opportunities, human services, transportation, public health and fiscal capacity. The Regional Official Plan policies also coordinate and set the stage for more detailed planning by local municipalities.

The Regional Official Plan prescribes an urban structure based on an intensification matrix whereby Regional Centres and Corridors are intended to accommodate the highest concentration of intensification, followed by GO transit train stations, bus terminals and subway stations and further down the matrix, Local Centres and Corridors. As such, it is a Regional interest to ensure appropriate levels of intensification occurs within all intensification areas.

Site-specific increases in height, densities, and therefore total number of residential units, sets a precedence and expectation for other properties in close proximity as well as across the Region. The local and Region's transportation and water and wastewater master plans are based on approved Official Plans and Secondary Plans. It is in the Region's interest to ensure adequate road and water and wastewater service capacity is available to accommodate the ultimate planned population and jobs. The cumulative impacts of site-specific amendments have the potential to impact the ability to service areas where significant growth through intensification is intended to occur.

According to the ROP, the subject lands are within the Urban Area and designated Community Area, but not within an area planned for significant levels of intensification.

The subject OPA proposes to increase the maximum permitted density on a site-by-site basis, which does not constitute comprehensive planning. According to ROP policy 2.3.2, *"communities shall be planned in a comprehensive and coordinated manner using land efficiently and optimizing infrastructure with a compact, mixed-use, pedestrian friendly and transit-supportive built form."* The proposed development continues a development pattern that exceeds planned growth, which may have an impact of the Region's planned transportation and water and wastewater networks. The ROP specifies, *"That intensification be directed in accordance with the Regional hierarchy to utilize land efficiently and sustainably that is commensurate with available hard and soft services and existing infrastructure, while having regard for the local context."* (Policy 4.4.1)

It is important that individual proposed intensification developments be built to utilize existing and planned transportation and municipal servicing capacities that do not over burden the area by development on any one site. ROP policy 4.4.25 states, *“That approval of secondary plans and/or development within strategic growth areas shall be contingent on the availability of existing or planned infrastructure and other services and be consistent with the Regional intensification hierarchy outlined in policy 4.1.3. York Region may require phasing of development on the basis of the capacity of water, wastewater and/or transportation and transit systems, and/or the timing of required infrastructure. York Region may also require the coordination of development applications to ensure an orderly, coordinated and phased approach to development and the provision of transportation, transit, water, wastewater and other infrastructure.”*

The subject lands are not within a strategic growth area and as such the proposed Amendment to add a high density 12-storey apartment building as a permitted use with a density of 3.5 FSI is more appropriate for planned intensification areas, such as along a Regional Corridor.

Departmental Comments

Below is a summary of comments received from Regional Departments.

Transportation

Transportation Planning, Sustainable Mobility, Transit, and Development Engineering have reviewed the proposed Official Plan amendment to redesignate the subject lands from "Neighbourhood" and "Natural Core" to a site with a specific amendment to facilitate a 12-storey residential building with 153 dwelling units. The applicant shall provide a response matrix which demonstrates how each of the following comments are addressed:

Transportation Planning

1. The applicant shall provide confirmation that the access to the garage will provide a minimum 15 m storage length to the property line (unobstructed). This is to prevent queuing back onto Bloomington Road.
2. An Auto-turn analysis shall demonstrate that vehicles utilizing the pickup and drop-off area are able to enter and exit in a forward motion from the site.
3. The applicant shall provide a drawing showing the sightline analysis shall be provided in an appendix, showing that the stone retaining wall does not interfere with the sightline looking east.

Development Engineering

1. The applicant must demonstrate that the proposed sanitary and water servicing connections are technically feasible. The Owner is required to submit a conceptual design to the satisfaction of the Region and the City.

The following are comments for subsequent applications:

Transportation Planning

1. Daylighting requirements will be determined as part of the Site Plan application.

Sustainable Mobility

1. No comments at this time.

Transit

1. Existing YRT transit services operate on the following roadways in the vicinity of the subject lands:
 - Bloomington Road
 - Yonge Street
2. Additional comments may be provided during the site plan approval process.

Water and Wastewater Servicing

Environmental Services Infrastructure Asset Management (IAM) staff have reviewed the subject OPA in conjunction with the Functional Servicing Report dated November 2022 prepared by Elmid Design.

Servicing Allocation

Residential development in the City of Richmond Hill requires servicing capacity allocation prior to final approval. If the City of Richmond Hill does not grant this development allocation from the existing capacity assignments to date, then the development may require additional Regional infrastructure based on conditions of future capacity assignment.

Municipal Water Servicing

The FSR indicates that water servicing for the development is proposed through a new 200 mm watermain, parallel to Bloomington Road, and connecting to the existing 150 mm watermain on Grovepark St, east of the subject site. A hydrant test was conducted on July 5th, 2022, and the results indicated there is sufficient pressure and flows to service the site, including fire flows. IAM has no further comments.

Municipal Wastewater Servicing

The FSR indicates that wastewater servicing for the development is proposed through a new 250 mm sewer line, parallel to Bloomington Road, and connecting to the existing sanitary system on Grovepark St, east of the subject site. IAM has no further comments.

Proximity of Regional Infrastructure

The Owner is advised that the Regional 500 mm diameter watermain is in close proximity of the proposed development along Bloomington Road. Integrity of the above Regional infrastructure shall be protected and maintained at all times during construction and grading of the proposed

development north of the site. Please be advised that any construction works in close proximity of the watermain, including any shoring and tie back systems if used, require a separate engineering approval. Design drawings for such works shall be submitted for Regional review and approval prior to construction. Further details will be provided as part of the engineering approval, as applicable, to be issued at a later time.

All construction drawings showing works in close proximity of the Region's infrastructure shall clearly show the location of the Region's watermain and include the following note for the Contractor:

"Integrity of the Regional 500 mm diameter watermain on Bloomington Road is to be protected at all times."

The Region's Construction Administrator (ENVassetapprovals@york.ca) shall be invited to attend the pre-construction meeting and to inspect the construction site during works performed in close proximity of the regional infrastructure. A minimum two weeks advance notice is required.

Water Resources

Water Resources Branch of the Public Works Department does not have any objections/concerns subject to the following comments with the Official Plan Amendment application as it relates to Source Protection policy. Should the proposal change and/or the application be amended, Water Resources will require recirculation for comment and/or approval.

Recharge Management Area

Please note the property is located within a Significant Groundwater Recharge Area (SGRA) and Wellhead Protection Area Q (WHPA-Q). As such the CTC Source Protection Plan water quantity recharge policy and York Region Official Plan Low Impact Development policies will apply. The proponent should maximize infiltration at the site using best management practices. The use of the following resource is encouraged: Low Impact Development Stormwater Management Planning and Design Guide by Credit Valley Conservation Authority. The contact person for this requirement is Don Ford at TRCA. The approving body for compliance with the policy will be the local municipality.

Summary and Conclusions

The subject lands are designated by the Richmond Hill Official Plan as "Neighbourhood", with a maximum permitted height of 4 storeys. The applicant's draft OPA proposes to permit:

- a high density apartment building
- increase the maximum permitted height from 4 to 12 storeys
- a density of 3.5 FSI
- a maximum GFA of 13,475.2 m² (145,046 ft²), and
- a maximum building floorplate of 760 m²

The subject lands, along Bloomington Road, is not within an area planned for this level of intensification. Regional staff are of the opinion that local planning staff are best able to determine the appropriate site-specific height and density based on compatibility measures and specific local context. However, it is a Regional interest to focus appropriately scaled intensification to areas that conforms with the planned Regional urban structure and intensification hierarchy. The proposed development and draft OPA, to add a high density 12-storey apartment building, in an area not planned for this level of intensification appears to not conform with the Richmond Hill and York Region Official Plans. The applicant is encouraged to revise their proposed development to better reflect the in-force Richmond Hill and York Region Official Plans.

The applicant is advised that in addition to the base processing fee, which we have received, there is also a Regional processing fee for revisions to Official Plan Amendments requiring recirculation. The current fee is \$3,600 for each subsequent resubmission requiring recirculation.

Should you have any questions or require further information regarding our comments, please contact Augustine Ko, Senior Planner, at 1-877-464-9675, ext. 71524, or by email at Augustine.Ko@york.ca.

Sincerely,

[Originally Signed By]

Karen Whitney, MCIP, RPP
Director, Community Planning and Development Services

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