

July 4, 2023

BY E-MAIL ONLY (opupdate@richmondhill.ca)

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

**Re: Comments on the Draft Official Plan Amendments (OPA) to the Richmond Hill Official Plan:
OPA 18.5 Yonge Street and Carrville/16th Avenue Key Development Area
OPA 18.6 Village Local Centre
OPA 18.7 Newkirk Local Centre
OPA 18.8 Oak Ridges Local Centre**

Thank you for the opportunity to comment on the above-noted draft OPAs circulated in support of updating the Richmond Hill Official Plan (OP). Toronto and Region Conservation Authority (TRCA) understands that these amendments would address several directions contained in the City Plan 2041 Key Directions Report and implement Protected Major Transit Station Area to conform with the York Region OP and provincial policy.

GENERAL COMMENTS

1. The proposed OPA boundaries are traversed by natural hazards and natural features important for natural hazard management (e.g., wetlands) that form part of the City's Greenway System and fall within TRCA's regulated area pursuant to section 28 of the *Conservation Authorities Act*. While many of the natural features and associated natural hazards are currently designated as part of the City's Greenway System, the full extent should be confirmed and subsequently reflected in an appropriate land use designation. TRCA, staff will advise on determining the location and extent of natural hazards and regulated features (e.g., wetlands, watercourses, flood plain, stable slope) to help City staff determine development limits.
2. In accordance with provincial policy, the policies in Section 3.1.4.3 d) and 3.2.2.3 of the City's OP, and TRCA's Living City Policies, TRCA would not support development or intensification within hazardous lands and future development and site alteration should be appropriately setback from the greatest extent of natural features and hazards, where applicable.
3. As per current practice, at the time of a *Planning Act* application circulated to TRCA, staff will advise on determining the location and extent of natural hazards and regulated features (e.g., wetlands, watercourses, flood plain, stable slope) to help City staff determine development limits.
4. Through the development application review process, a site visit/staking and/or technical studies may be required to confirm the limits of any wetlands or hazardous lands.
5. Safe access to and from sites containing hazardous lands would be a prerequisite to evaluating development potential, where applicable.

6. Whether through the OPA or development application review process, land use redesignation(s) should be established and/or revised to reflect the limits of any wetlands or hazardous lands, including setbacks/buffers as applicable, in accordance with provincial policies, the City's OP policies, and TRCA's LCP.
7. We appreciate the proposed inclusion of side bar text to clarify that, in relation to the maximum permissible total GFA calculation, the developable portion of a site excludes lands deemed undevelopable by operation of the City's OP policies related to "hazards". We suggest specifying natural hazards, not just "hazards".
8. Additional language regarding development prohibitions and restrictions within natural hazards could be included in relevant sections of the proposed OPAs (i.e., not just in relation to GFA calculation). For example, side bar text could clarify that OPA permissions for more new intensive development in certain areas (i.e., KDAs and Local Centres) would be subject to the City's OP policies on natural hazards and/or Greenway System, and associated Schedules, as well as TRCA's section 28 regulation (which could also be reflected in a map, figure, or schedule).

OPA SPECIFIC COMMENTS

OPA 18.5 – Yonge Street and Carrville/16th Avenue Key Development Area (KDA)

9. We understand that the lands affected by the draft OPA would be redesignated from *Neighbourhood* and *Regional Mixed-Use Corridor* to *Key Development Area*, and that a key component of this redesignation is to provide for higher density development. These lands are directly adjacent to a valley corridor and contain an unevaluated wetland.
 - As indicated in the general comments above, through the development application review process, a site visit/staking and/or technical studies would be required to confirm the limits of the hazardous lands and wetlands where applicable. A subsequent redesignation of the lands containing the feature limit and an appropriate buffer may be recommended.

OPA 18.6 - Village Local Centre

10. TRCA mapping shows an unevaluated wetland on lands east of Addison Street (part of lands (1) on Schedule 1 to OPA 18.6) not captured within the City's Greenway System.
 - As indicated in the general comments above, through the development application review process, a site visit/staking and/or technical study would be required to confirm the presence and limit of the wetland. A subsequent redesignation of the lands containing the feature limit and an appropriate buffer may be recommended.

OPA 18-7 – Newkirk Local Centre

11. We understand that Schedule 1 to OPA 18.7 proposes to redesignate lands (4) from 'Local Mixed-Use Corridor' to 'Local Centre', redesignate lands (5) from 'Neighbourhoods' to 'Local Centre' and lands (3) from 'Local Development Area' to 'Local Centre'. These lands are partially within TRCA's regulated area of German Mills Creek, including an associated floodplain, meander belt and buffer.
 - Future development and site alteration within TRCA's regulated area must be appropriately setback from the limit of the valley corridor, associated natural hazards, and applicable buffer.
 - Safe access to and from sites containing hazardous lands would be a prerequisite to evaluating development potential.

OPA 18.8 – Oak Ridges Local Centre (ORLC)

12. A significant portion of the proposed OPA boundary would be within the floodplain associated with the East Humber River and Lake Wilcox. A section of the western boundary of the ORLC overlaps with the Lake Wilcox Special Policy Area (SPA). Specifically, the lands located west of Yonge Street and south of King Road.

- Future development and site alteration within areas overlapping the ORLC and the Lake Wilcox SPA boundary should be consistent with Section 3.2.2.4 and Schedule A7 of the City's OP as development and site alteration may be permitted under the SPA-specific flood management approach, subject to floodproofing and technical requirements.
- The lands located within the flood plain outside of the Lake Wilcox SPA boundary are generally designated as Natural Core and Natural Linkage areas. As noted in our general comments above, side bar text could be included to clarify that OPA permissions for more intensive development would be subject to the City's OP policies on natural hazards and/or Greenway System, and associated Schedules, as well as TRCA's regulation.

We trust these comments are clear and look forward to continuing to assist the City as the OPAs are finalized. Should you have any questions or require any clarifications, please contact the undersigned at jeff.thompson@trca.ca.

Sincerely,

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