



64 JARDIN DRIVE, UNIT 1B  
CONCORD, ONTARIO L4K 3P3

T 905.669.4055

KLMPLANNING.COM

File: P-3533

Sent by email: [clerks@richmondhill.ca](mailto:clerks@richmondhill.ca)  
[zoning@richmondhill.ca](mailto:zoning@richmondhill.ca)

August 26, 2025

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

**Attention:** City Clerk and Mayor and Members of Richmond Hill Council  
Salvatore Aiello, Manager, Development Zoning & Committee of Adjustment

**Re:** Communication - Public Meeting – Tuesday September 2, 2025, 6:00 PM

**City of Richmond Hill Comprehensive Zoning By-law – ORMOS and ORMOS1 Zones  
Islamic Society of Regional Municipality of York  
1200-1380 Stouffville Road  
City of Richmond Hill, Region of York  
City File: MZBA-23-0001**

---

KLM Planning Partners Inc. is the land use planning firm retained on behalf of the Islamic Society of Regional Municipality of York (“**ISYR**”) being the owner of the lands located at 1200-1380 Stouffville Rd. (“**Subject Lands**”). We understand that the City of Richmond Hill (“**City**”) is in the process of developing its Comprehensive Zoning By-law (“**CZBL**”) to establish zoning regulations to implement the City’s Official Plan (“**OP**”) for specified lands, and repeal and replace the current applicable parent zoning by-laws.

We have reviewed the materials provided on the June 24, 2025 Council Public Meeting including report SRPBS.25.070, the draft CZBL and associated schedules, as well as the statutory consultation notices released on August 6, 2025.

Based on our review, we provide the following comments:

1. We are concerned about the land use restrictions in the zones identified on draft CZBL Schedule A10, both in general and in relation to the Subject Lands. While we understand that this Schedule is being brought into the draft CZBL from existing By-law 128-04 as amended, it is our opinion that this additional zone layer is not necessary to protect lands in the Oak Ridges Moraine (“**ORM**”), and in fact well exceeds the environmental protections implemented through the Oak Ridges Moraine Conservation Plan (“**ORMCP**”) and Richmond Hill Official Plan (“**OP**”).

The ORMCP provides land use and resource management planning direction as it pertains to lands within the Oak Ridges Moraine (“**ORM**”). This includes limitations on development within specified “vegetation protection zones” and identifies a larger “area of influence” in the Table to Part III of the ORMCP.

“Vegetation protection zones” are generally 30 metres from key natural heritage features (“**KNFs**”), where development is prohibited. We observe that this 30 metre buffer is generally aligned with the “ORMOS” zone in the draft CZBL. The larger “area of influence”, up to 120 metres, is generally aligned with the “ORMOS1” zone, which is 90 metres from the ORMOS zone.

Sections 1.12.2(2) and Tables 8.1A and 8.1B of the draft CZBL introduce restrictions on development for the ORMOS1 zone that far exceed the ORMCP and the OP, and appear to significantly restrict developable lands in proximity to the ORM, including in established settlement areas such as West Gormley. The rationale for this added protection has not been provided and creates significant uncertainty for affected lands such as the Subject Lands.

Comparatively, the ORMCP requires that applications for development or site alteration within the “area of influence” (120 metres) must include a natural heritage evaluation but generally does not introduce strict limitations on development (outside of the lands within the “vegetation protection zone”). The policies of the OP reflect the ORMCP in requiring a natural heritage evaluation in the “area of influence”, but without restricting development (Section 3.2.1.1).

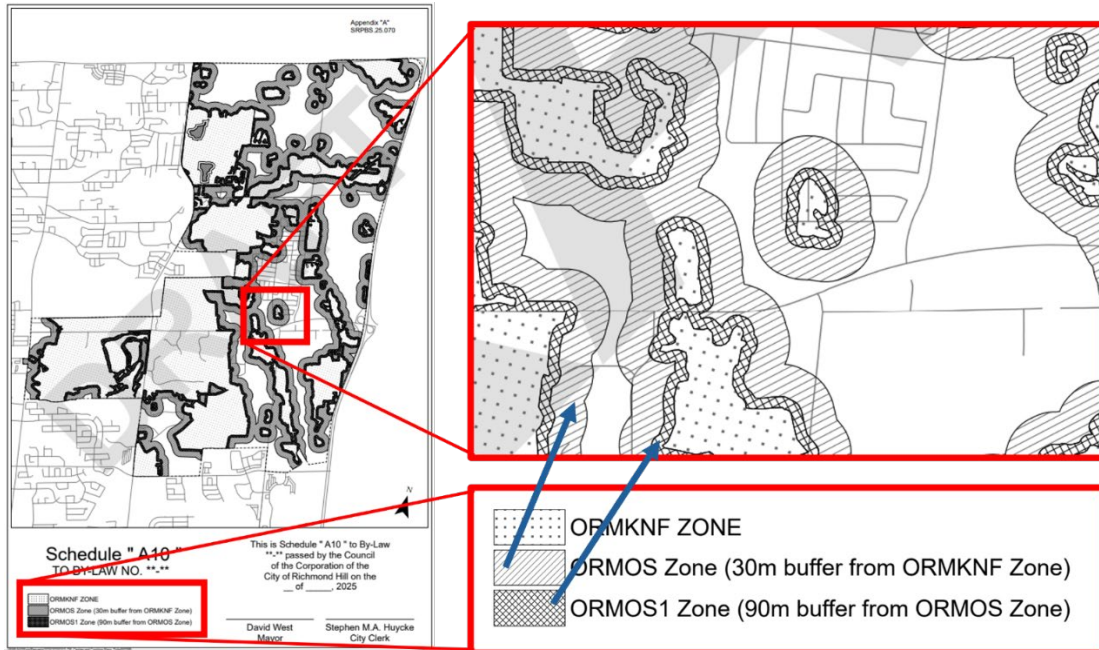
In our opinion, Schedule A10 and associated zones add an unnecessary layer of uncertainty and complexity to the draft CZBL, do not align with existing policy direction from both the Province and City, and should be removed through the CZBL process. Protections for the ORM are already sufficiently achieved through ORMCP and OP policies, to which all applicable development applications must conform.

2. While it is our opinion that Schedule A10 should be removed from the draft CZBL, if it is retained, it should be updated to:
  - a. Permit additional appropriate land uses in accordance with the ORMCP and OP, most notably expanding permissions within the ORMOS1 zone;
  - b. Reflect existing (and no longer existing) KNFs; and
  - c. Include accurate symbology.

In reviewing Schedule A10 with respect to the Subject Lands, we note that a large KNF is identified that no longer exists. This former woodlot was removed in the process of residential development to the north of the Subject Lands, and should be removed from any KNF mapping. See **Figure 1** below.



**Figure 1:** Comparison of Draft Schedule A10 and aerial imagery of Subject Lands and lands to the north. Schedule A10 should also be reviewed more broadly to identify other such inconsistencies. In addition, it also appears that the symbology for Schedule A10 may be incorrect, with the symbols for the ORMOS and ORMOS1 zones appearing inadvertently swapped. See **Figure 2** below.



**Figure 2: Draft Schedule A10 symbology**

3. The CZBL should be revised to include transition policies that recognize existing zoning by-law amendment applications in progress under existing in-effect zoning by-laws prior to the date of the enactment of the City's comprehensive zoning by-law to provide clarity and certainty for landowners pursuing development approvals. Furthermore, the transition provisions must also recognize that the implementing site-specific zoning by-law amendment approved by Council or the Ontario Land Tribunal following the date of the enactment of the City's comprehensive zoning by-law must further extend to all future development applications (i.e. draft plan of subdivision, draft plan of condominium, site plan, building permit(s), consent, part lot control) that are required and applied for downstream in order to facilitate the complete construction and implementation of the project including all phases of development in accordance with the implementing site-specific zoning by-law amendment.

We acknowledge that the transition provisions in Section 1.12 of the draft CZBL include consideration for certain types of applications including site plan, draft plan of subdivision, and draft plan of condominium, and we note that such transition provisions are not provided for zoning by-law amendments or development applications that are subsequently required in accordance with approved site-specific zoning by-law amendments to implement the fulsome development project. As an example, the City of Vaughan CZBL 001-2021 includes transition provisions that would allow a project to be built over time under a number of required development applications, which we have included as a LINK so that you can access and review Section 1.6 "Transition".

**LINK to Vaughan CZBL 001-2021:** [The City's Comprehensive Zoning By-law 001-2021 | City of Vaughan](#)

We suggest including language in Richmond Hill's CZBL such as:

*"1. Nothing in this by-law shall apply to prevent the approval of an application to amend [previous by-law] if the application was filed and deemed complete in accordance with the City*

of Richmond Hill Official Plan on or before the day that this By-law is passed and complies with all requirements of the Planning Act.”

“2. Nothing in this by-law shall prevent the approval of the following applications if such application(s), save under (f) are complete and comply with an amendment to Zoning By-law [previous by-law] as amended that was finally approved and in effect in accordance with 1 above, and comply with all requirements of the Planning Act:

- a. site plan drawings and conditions;
- b. a consent to sever;
- c. an approval of a draft plan of subdivision;
- d. a plan of condominium approval;
- e. a part lot control exemption approval pursuant to Section 50 of the Planning Act; or
- f. a minor variance required as a condition or consequence of one of (a) to (e) above, or identified as required upon review of a building permit application.”

“3. Nothing in this By-law shall prevent the erection or use of a building or structure on a lot where the applicable applications under 1 and 2 above have been finally approved and are in effect and the building permit application(s) complies with the provisions of [previous zoning by-law], as amended and all final approved minor variances.”

“4. Upon completion of the project for which approvals and permits have been obtained pursuant to 1 to 3 above this exemption shall cease to apply.”

This would ensure that development is not delayed by the passing of the CZBL, and all existing work to prepare development applications that are filed before and after the passing of the by-law can be utilized until a building permit(s) is/are issued and construction of the project is completed.

We appreciate the opportunity to provide comments on the draft CZBL. We have monitored the recent statutory Open House on August 19, 2025 and plan to speak on deputation at the Public Meeting on September 2, 2025 on these matters. If you have any questions, please do not hesitate to contact the undersigned.

Please notify KLM and the owner of all future statutory and non-statutory meetings regarding the City's Comprehensive Zoning By-law review. Additional comments may be forthcoming pending the outcome of what is discussed and decided at these meetings by City staff and Council.

Yours truly,

**KLM PLANNING PARTNERS INC.**



Billy Tung, MES, MCIP, RPP  
Partner



Madison Van West, MES, MCIP,  
Intermediate Planner II



Grant Uyeyama, BAA, MCIP, RPP  
Principal Planner

Copy to: Zafar Bangash, Islamic Society of Regional Municipality of York