



November 23, 2021

Dear Mayor and Council

[Council Agenda](#), Item 13.7. – November 24, 2021

13.7 SRPI.21.089 - Request for Endorsement – Affordable Housing Strategy

Re: Affordable Housing Strategy – Strategy Report dated May 2021

Attn: Acting Mayor Di Paolo and Members of Council

I represent North Elgin Centre Inc. owner of lands in the north-east quadrant of the Yonge Bernard KDA. I write further to my submission letter to Council as part of the OP Update sent November 10, 2021.

On November 22nd, notice from the city was sent via email advising that this matter (Item 13.7) was returning to Council on November 24th for endorsement.

We remain concerned with the notion of endorsing the Strategy Report even with the clarification provided by Staff below. We had understood that the Strategy Report was going to look at tools to support the development of market housing for moderate income households only.

What Endorsement means

On page 4 of the Staff Report, Staff clarify what endorsement means, and advise on timing. The process will take up to 3 years:

...and they will have commenced implementation.

Consequently, endorsement of the Strategy will not commit the City to the use of any specific tools at this time, rather, it will identify the range of tools and actions that Council can expect staff to present in greater detail over the next three years. To that end, endorsement of the Strategy provides staff with the necessary direction to pursue the research/consultation that is necessary to present the individual actions/tools to Council for its consideration. Once established, the Affordable Housing Strategy Implementation Committee will play an important role in determining timing of actions, consultation process for each, and their readiness to be brought to Council for approval of specific tools.

And, as noted above, Staff require more time to do research and consult rather than actually providing the “strategy” to Council and the public at this time.

On page 3 of the Staff Report, under Figure 1, Staff list potential tools and actions that could be used. Item 3 under Figure 1 contemplates certain tools be utilized to address housing affordability. They include:

3. Standards Tools

(3 actions)

- Parking Requirements
- Stratification of Parks and Public Spaces
- Alternative Development Standards

All of which have been recommended for the NEC lands.

Staff Report v. Consultant's Strategy Report (Appendix B)

On page 22 of the Strategy Report (Appendix B to the Staff Report), the consultant recommends that parking requirements be reduced around MTSA's based on the findings of the Transportation Masterplan Update. The reference to the TMP Update must be an error.

The consultant further recommends that Council consider further reductions to the parking standard...where the proponent demonstrates that the demand for parking will be less than *what is otherwise required*.

The above statements, from the consultant, are problematic because "no one knows" what is required, and the reason for that is the city continues to advise the public that it has not completed the ongoing Parking and TDM study, nor the Stratification Study (promised during the Phase 1 Yonge Bernard Secondary Plan LPAT hearing), that it claims it needs. This has delayed the creation of new apartment units along the Yonge Street Transit Corridor and has contributed to the acknowledged housing crisis in Richmond Hill.

More importantly, there remains little to no buy-in from key stakeholders concerning the parking rates the city is currently using which continue to be based on a "draft strategy" from 2010 based on 2006 studies. And so, while a key household forming demographic population is leaving and not choosing to make Richmond Hill their home, we all wait while Staff continue to rethink what the parking rates should be and studies remain uncompleted.

Endorsement of the Strategy should include creation of zero car household dwelling units

Given the focus of the strategy, we were surprised to learn that the Strategy Report does not expressly recommend the creation of "**zero car household dwelling units**" along the Yonge Street BRT and within close proximity to this and other higher order transit.

As the Strategy Report and Background Report (<https://www.richmondhill.ca/en/shared-content/resources/documents/Affordable-Housing-Strategy-Background-Report.pdf>) makes clear, the cost of requiring parking spaces adjacent to higher order transit adds significant and unnecessary cost to a dwelling unit which has/will have convenient access to transit, or other ride sharing options (such as the NEC lands), assuming a trip was planned beyond the 15-minute complete community.

Inclusionary Zoning Bylaw is not viable at Bernard KDA

On page 289 of the Background Report, the consultant notes that inclusionary zoning is not viable for high density development at the Bernard KDA (for the 3 scenarios tested).

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5.6 Conclusions

The analysis found that the proposed density increases are strongly correlated with the viability of Inclusionary Zoning. In general, density increases in Richmond Hill were found to be sufficient to facilitate inclusion rates of affordable units in condominium developments.

Condominium Apartments with Affordable Ownership Units

High-rise condominiums with affordable ownership units show potential for inclusion rates of up to 30% in MTSAs with higher and moderate density increases (Richmond Hill Centre, Major Mackenzie and Valley Mede). Density increases in high-rise buildings in Bernard were not sufficient to support affordable ownership units. Mid-rise buildings could support the inclusion of affordable ownership units of approximately 10%. The high rates of viable inclusion of affordable ownership units in this analysis can primarily be explained by the high proportion of one-bedroom units. The difference between the affordable ownership price and the market price for a one-bedroom unit in Richmond Hill are small (\$466,888 compared to \$492,250). This suggests the City could consider requiring a higher proportion of two- and three-bedroom units to accommodate larger families in

condominium developments with affordable ownership units.

Condominium Apartments with Affordable Rental Units

High-rise condominiums with affordable rental units show the potential for inclusion rates of up to 10% in areas with high density increases (Richmond Hill Centre and Major Mackenzie) and between 5% and 10% in areas with moderate density increases (Valley Mede). Density increases in Bernard were not sufficient to support Inclusionary Zoning. Similarly, density increases in mid-rise buildings were also insufficient to support a significant proportion of affordable units in new developments (less than 5%).

Purpose-Built Rental Apartments

Furthermore, the analysis showed that purpose-built rental developments are at a significant disadvantage compared to condominium buildings. Density increases and average market rents are not sufficient to make the development of this tenure viable without additional incentives, even though demand for these units is strong as was shown in the needs assessment conducted as part of the background report. This suggests requiring market and affordable rental units in condominium

The City of Richmond Hill Affordable Housing Strategy – Background Report 289

If inclusionary zoning is not viable at the Bernard KDA and the market is not delivering any new high density apartment units to this KDA, then the housing crisis continues.

Yours truly,

MPLAN Inc.

A handwritten signature in blue ink that reads "Michael S. Manett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Per: Michael S. Manett, MCIP, RPP.

cc. NEC