

Submission to Richmond Hill City Council re: Comprehensive Zoning By-law Project – Phase 2

Submitted by: Richmond Hill resident Michael Theodores – September 17, 2024

Introduction:

As a long-time resident of Richmond Hill – residing just a few blocks from the area classified as **Newkirk Local Centre** – I have continued to remain engaged in the current and future planning direction of this neighbourhood along with the overall city.

I provided a submission to Council on June 20, 2023, expressing concerns with the very aggressive intensification the city's planning department was recommending for Newkirk Local Centre.

I was disappointed to learn – through a mailer, not an invitation to comment on a final decision about this review in November 2023 – that Council approved very aggressive density targets despite limited South-North service provided by the Richmond Hill GO train on weekdays and **never on weekends or Holidays.**

In preparation for Council's further discussion about future development proposed for Newkirk Local Centre through Phase 2 of Comprehensive Zoning By-law Project on September 18, 2024, I've prepared this latest submission that I hope Council members take into consideration for the next phases of the review.

Recap of June 20, 2023 Council submission

In my submission to Council on June 20, 2023, along with highlighting the limited morning and evening Richmond Hill Southbound and Northbound GO rail service, I also referenced a Metrolinx document titled: **GO Expansion Full Business Case – November 2018.**

In reviewing the document, there were several troubling updates about the Richmond Hill line that I never saw shared publicly. This included a summary on Page 60 of the document that read as follows:

The 2015 GO RER Initial Business Case found a relatively weak case for frequent all-day services on the corridor, and identified issues that should be addressed before deciding on a development strategy for the corridor.

I provided the screen cap on the following page that cited challenges on this corridor largely related to infrastructure and competition from other GO lines. **Only the final bullet touches on density and in this reference, it notes a lack of density on the *entire* corridor – not just the station at Newkirk and Major Mackenzie Drive East.**

RIC Richmond Hill

The 2015 GO RER Initial Business Case found a relatively weak case for frequent all-day services on the corridor, and identified issues that should be addressed before deciding on a development strategy for the corridor.

Technical challenges include:

- Flooding in the lower Don River, which affects most of the corridor from Richmond Street to the Millwood Bridge
- Slow journey times due to indirect alignment and low track speeds
- CN Rail ownership of the corridor north of Old Cummer, and conflicts with intensive freight services at the Doncaster Diamond rail junction and on the corridor north to Bloomington

- Lack of practical opportunities on the alignment for interchange with TTC other transit. The corridor passes under Line 2 Subway, the Millwood Bridge with intensive bus services, and the Eglinton Crosstown LRT, but the vertical separation makes it difficult and expensive to provide interchanges. Note that Oriole station is being relocated, and an effective interchange will be provided with Line 4 Subway.

Challenges affecting demand and benefits include:

- Proposed parallel transit improvements including Line 1 Subway extension to Richmond Hill, and the Downtown Relief Line to York Mills Road
- Competition from frequent 8 tph all-day service now planned for the Stouffville corridor
- Low population density and limited development potential along most of the corridor



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Additionally, I mentioned that I noticed on Page 11 of a [staff report](#) dated February 26, 2020 that the Region of York acknowledged this same expansion report in debating whether to include the Richmond Hill GO station in its Major Transit Station Area (MTSA) for these very reasons. Interestingly, staff directed to add it to the list anyways (see screen cap below).

Consideration of June 2019 Council motion for additional MTSA

At their meeting on June 25, 2019, Council directed City staff to communicate to the Region the desire to include the Richmond Hill (Newkirk) and Gormley GO Stations as MTSA in the Region's intensification framework. The Gormley GO Station will be discussed in the following section, which discusses the potential settlement boundary expansion around the GO station.

The GO station located on Newkirk Drive at Major Mackenzie Drive East was not identified by the Region as a MTSA due to the Richmond Hill GO Train line not being a priority transit corridor under the Growth Plan. The area surrounding the station is designated as Local Development Area and Employment Corridor, which would support higher density redevelopment than currently exists. Notwithstanding its exclusion from their initial list released in April 2019, Regional staff have indicated they may support a MTSA at this location. City staff recommend its inclusion based on the context of the area to support redevelopment.

Despite these compelling reasons to consider reducing the proposed target of **150 people or job per hectare** – which I noticed was done with the Rutherford GO station (100 people or jobs per hectare) that has seven day, two-way service – Council approved these targets last fall and the planning department is continuing to advocate for a future target of **350 people or jobs per hectare**.

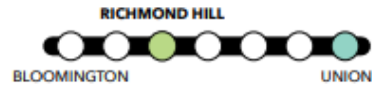
Since my submission and Council's decision, I've received updates from Metrolinx about current and future GO train service and from the YRT re: bus service on the Major Mackenzie core that I feel further warrant a slow and steady approach to intensification in this area.

Latest updates re: Richmond Hill GO train service

While doing research this spring for the current *More Homes, More People* consultation, I came across an updated Metrolinx report re: **GO Rail Station Access** dated February 2023. It can be accessed on [this website page](#).

The report includes discussion about the Richmond Hill GO corridor beginning on Page 127 and I was surprised to learn that Metrolinx is forecasting that ridership on this line to **decrease – not increase** – through 2041 (see screen cap of Page 133 below).

Richmond Hill Line
Region of York
City of Richmond Hill



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Richmond Hill GO			
Station Classification			
Station Access Type (2019)	Mixed Modal	Station Categorization Framework	Medium
Station Access Type (2041)	Mixed Modal	Station Service Model	B - Limited Service
Parking Typology (2041)	Manage	Retail Typology	Access Station
GO Rail Ridership		Current (2019)	Forecast (2041)
Daily Riders' Home Station		2,675	2,100
Daily Riders' Destination Station		200	50
Daily Total Footfall (Boardings + Alightings)		5,375	4,075

Metrolinx highlighted despite expectations for significant population growth in Richmond Hill and the region, the reasons for the forecast on Page 128 included the expansion of the Yonge North Subway Extension – which will offer superior service using a duplicate transit path – along with continued high freight activity by CN Rail which owns the track north of the Doncaster Diamond in Thornhill (see screen cap below)

Richmond Hill Line



LEGEND

- Existing barrier-free path of travel
- Average parking utilization (pre-COVID-19 pandemic)**
 - Equal or higher than 95%
 - 86%-94%
 - Equal or less than 85%
 - No dedicated GO parking facility
- Station within Major Transit Station Area (MTSA) or Protected Major Transit Station Area (PMTSA)

Corridor Context

- The City of Richmond Hill and York Region are expected to experience a significant increase in population and employment by 2041.
- Currently, there are no plans to increase service levels on the Richmond Hill GO corridor.
- Overall ridership is projected to decline due to a lack of all-day, two-way service, expansion of other GO services, and the Yonge North Subway Extension (YNSE).
- There is an opportunity to create a couplet station with the proposed YNSE stations near Langstaff GO, integrating station access requirements to enhance customer experience.
- The corridor experiences high freight activity as it is shared with CN Rail.

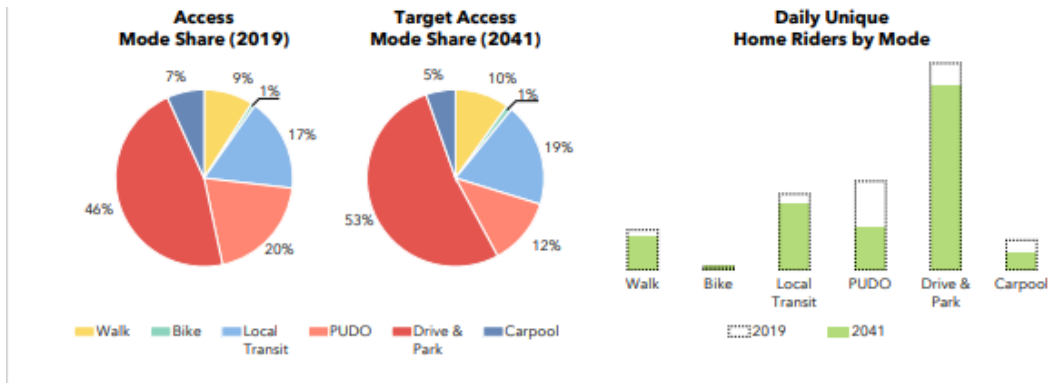
After discovering this report, I reached out to Metrolinx’s executive team to see if this report was the most current report and also if Richmond Hill planners and Council were aware of it last year. It was confirmed that this was the case and that the Richmond Hill Centre/Langstaff GO station was the priority with the expansion of the Yonge North Subway Extension.

With this latest forecast, I question why the city is continuing to push through with very aggressive intensification in the area. As it stands, the corridor only offers **four** Southbound trains in the morning (ending at 8:13 a.m.) and five in the afternoon-evening (ending at 6:45 p.m.) – by far the worse of all GO corridors (see screen cap of schedule below)

Monday to Friday (except holidays) Du lundi au vendredi (sauf les jours fériés)												
SOUTHBOUND / EN DIRECTION SUD						NORTHBOUND / EN DIRECTION NORD						
Route Number Numéro du trajet	Zone→	Dp	Ar	Richmond Hill 98	Richmond Hill 78	Richmond Hill 50	Thornhill 60	North York 5	North York 5	Toronto 2	Ar	
Trip Number Numéro du parcours				Bloomington GO	Gormley GO	Richmond Hill GO	Langstaff GO	Old Cummer GO	Old Cummer GO	Orléans GO	Union Station	
61	61070	05 00	05 06	05 20	05 32	→	→	→	→	06 00		
	5006	05 57	06 03	06 13	06 19	06 27	06 31	07 08				
	5008	06 57	07 03	07 13	07 19	07 27	07 31	08 08				
	5208	07 27	07 33	07 43	07 49	07 57	08 01	08 38				
	5010	07 57	08 03	08 13	08 19	08 27	08 31	09 08				
61	61280	09 05	09 13	09 28	09 46	→	→	10 30				
61	61320	10 10	10 17	10 32	10 48	→	→	11 25				
61	61370	11 10	11 17	11 32	11 48	→	→	12 25				
61	61400	12 10	12 17	12 32	12 48	→	→	13 25				
61	61440	13 15	13 22	13 37	13 53	→	→	14 30				
61	61490	14 20	14 28	14 43	15 01	→	→	15 45				
Route Number Numéro du trajet	Zone→	Dp	Ar	Toronto 2	North York 5	North York 5	Thornhill 60	Richmond Hill 50	Richmond Hill GO	Richmond Hill 78	Richmond Hill 98	Ar
Trip Number Numéro du parcours				Union Station	Orléans GO	Old Cummer GO	Langstaff GO	Richmond Hill GO	Richmond Hill GO	Gormley GO	Richmond Hill GO	Bloomington GO
61	61261	09 40	→	→	10 10	10 28	10 42	10 55				
61	61341	11 40	→	→	12 13	12 31	12 45	13 00				
61	61381	12 40	→	→	13 18	13 36	13 50	14 05				
61	61421	13 40	→	→	14 23	14 41	14 55	15 10				
61	61441	14 45	→	→	15 40	16 00	16 17	16 35				
	5323	15 45	16 13	16 18	16 26	16 32	16 42	16 53				
	5325	16 45	17 13	17 18	17 26	17 32	17 42	17 53				
	5127	17 15	17 43	17 48	17 56	18 02	18 12	18 23				
	5327	17 45	18 13	18 18	18 26	18 32	18 42	18 53				
	5329	18 45	19 13	19 18	19 26	19 32	19 42	19 53				
61	61721	19 40	→	→	20 15	20 33	20 47	21 00				
61	61771	20 40	→	→	21 13	21 29	21 43	21 55				
61	61811	21 40	→	→	22 13	22 29	22 43	22 55				
61	61841	22 40	→	→	23 13	23 29	23 43	23 55				
61	61901	00 40	→	→	01 07	01 20	01 33	01 45				
61	61961	02 40	→	→	03 07	03 20	03 33	03 45				

As a result, I think it’s fair to ask why Council approved such a high level of intensification in this area when future ridership is not expected to be materially better in the future due to the expansion of TTC subway service north and CN’s continued ownership of track north of the Doncaster Diamond.

Equally interesting was the profile of a GO rider at this station. Anecdotally, I have only seen a trickle of riders disembark from the train and either walk to a nearby mid or high-rise apartment or condo in the area or to smaller homes in the nearby established areas.



The Metrolinx report shows that only 9% of riders using this station walk to it. The majority either drive to the station or are picked up or dropped off (known as PUDO). A fair amount (17%) use transit.

Interestingly, the 9% figure is higher than that of the Langstaff GO station (5%) which has higher density in the immediate area. So, this runs counter to the argument that more high-density projects will have a material impact on people walking to the station as opposed to using a car.

Just like the phrase *It Takes A Village to Raise a Child*, when it comes to GO stations in general, *It Takes an Entire City to Support GO Transit* – especially in Richmond Hill.

The reality is that the Richmond Hill GO corridor only appeals to a narrow segment of the population – one that works in downtown Toronto, largely in close vicinity to Union Station. And, once the TTC subway expands to Richmond Hill, it will provide a superior rival to the GO Train as service will be more frequent and will offer more stops within York Region and Toronto. Hence, why Metrolinx is expecting a hit to future ridership – something I commented in my submission last June and which has now been supported.

Meanwhile, a CN representative provided added clarity in a return email about why CN values this track so much and why residents are often caught at the pass at Weldrick or Elgin Mills. It's a very lucrative line that extends north and even travels to Western Canada (see screen cap below).

On Tuesday, August 6, 2024 at 09:58:42 AM EDT, GLD-Permits <permits.gld@cn.ca> wrote:

Good Morning,

From Doncaster diamond, CN tracks goes north till Simcoe, Bala sub,MP88.39 which then splits into two directions. One side of the tracks runs till Nipissing, Newmarket sub,MP224.19 and the other to Thunderbay, Caramat sub,MP129.9 which then runs west to Winnipeg and other western provinces.

Thank you.



CN GLD - PERMITS

Public Works | Engineering – Eastern Region

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In recent correspondence I've received from Metrolinx, it was acknowledged CN's ownership of the track north of the Doncaster Diamond impacts service levels and that there were no major imminent infrastructure plans for the track as the Yonge North Subway Expansion remains the key focus to provide enhanced transit to Richmond Hill and other areas within the region.

No timeline for Major Mackenzie BRT

As I touched on in my June 20, 2023 submission, bus service on the Major Mackenzie core is substantially worse than on Yonge Street or Highway 7 which are served by the Viva rapid bus service.

While Viva service is more frequent and has dedicated bus lanes from Newmarket all the way through to Thornhill, bus service on Major Mackenzie Drive East is less frequent, often involves a transfer to another bus (such as a North-South route) and has to fight the same traffic as cars.

I reached out to the YRT for an update on the timeline for bus rapid transit (BRT) which I've seen referenced in various documents and it was confirmed no such service is planned before 2041 (see screen cap below).

So, similar to the Richmond Hill GO train, there are no material transit improvements on the horizon that would validate the level of intensification that is being called for.

RE: Questions re: YRT transfers/BRT expansion

From: Transitinfo (transitinfo@york.ca)

To:

Date: Thursday, September 5, 2024 at 03:54 p.m. MDT

Good afternoon Michael,

This email is a follow-up to your inquiries regarding the implementation of future York Region Transit (YRT) service along Major Mackenzie Drive, in the City of Richmond Hill and YRT fares.

In the 2022 York Region Transportation Master Plan, it identifies Major Mackenzie Drive, Jane Street, and Leslie Street as potential candidates for rapid transit corridors, with additional studies pending for McCowan Road. This plan is designed to address our transportation infrastructure up to the year 2051, accommodating anticipated growth and evolving commuter needs.

While these corridors are earmarked for future bus rapid transit services, specific timelines for their development have not been established at this point. YRT is committed to continually assessing ridership trends and will adapt services accordingly, which may include frequency adjustments and the introduction of express services to better serve our customers.

In addition, YRT removed zone tickets in 2017 to make our fare policy and collection consistent across the Region and to align with other Greater Toronto Hamilton Area (GTHA) transit systems. Effective February 26, 2024, Ontario's One Fare Program will allow transit riders to only pay once when connecting to and from the Toronto Transit Commission (TTC), GO Transit, Brampton Transit, Durham Region Transit, MiWay and York Region Transit (YRT) using a PRESTO card. Transfers are valid for two hours for trips started on local transit systems. You may visit [here](#) for more information about the One Fare Program.

We appreciate you taking the time to share your inquiries with us.

Should you have any further questions, please feel free to contact us.

Sincerely,

Kai C. | Customer Relations Coordinator
Strategic Initiatives and Programs, Public Works Department

Discussion re: STRAs/Unintended consequences

For the September 18, 2024 Council meeting, I also wanted to touch on short-term rental accommodations or what the planning department calls STRAs.

I confirmed with Anna Henriques of Richmond Hill's planning department that the latest phase of the Comprehensive Zoning By-law Project continues to allow for the ability of residents to use their properties as STRAs provided it's occupied by the homeowner. This helps some to afford their home.

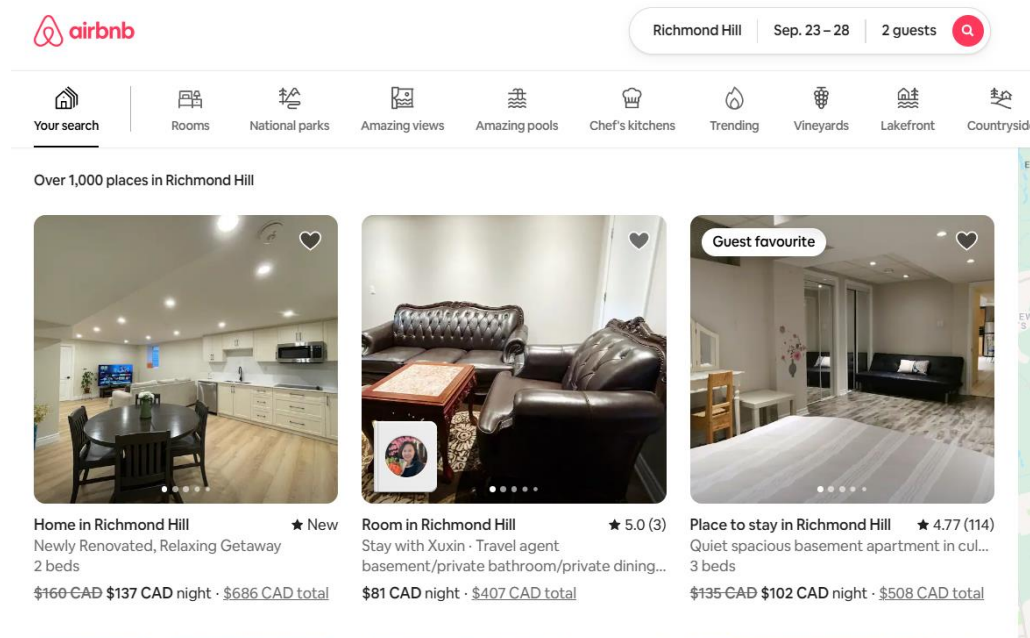
While I have no issue with this, I do have concerns that a future amendment that is being considered under the *More Homes, More People* consultation may need this policy to change to address a potential gap.

Under the consultation, the city is considering allowing properties within an MTSA to expand up to four storeys in height **without** public consultation or Council review which is what occurs currently.

This opens the door to a potential, unintended consequence where an existing homeowner or an investor could purchase a low-rise home within an MTSA zone, expand it to four storeys, and have the rest of the property serve as a STRA provided they are the 'homeowner.'

As a result, it would do little to achieve what the amendment is attempting by Council – to provide more housing units to people who want to reside in Richmond Hill for an extended time – not while they are visiting.

Simply do a quick airbnb-Richmond Hill Google search and airbnb's website lists over 1,000 properties that are available (see screen cap on following page).



If such a high number of STRAs already exist, logic would guide one to surmise they will only multiply if the city doesn't close this potential gap.

To support this concern, see a screen cap on the following page of an email I received from Arvin Prasad – Commissioner of Development Services of the City of Markham. I reached out to Mr. Prasad after reading that Markham banned STRAs back in 2018.

While noting Markham's ban related to a proliferation of 'party houses', he also noted 'the use of whole houses or legal second sites solely as short term accommodations would eliminate their availability for use as a housing unit.' He added 'several studies show a direct correlation between housing availability or supply and housing affordability.'

On Thursday, September 5, 2024 at 11:50:50 AM EDT, Prasad, Arvin <aprasad@markham.ca> wrote:

Michael,

As you noted, short term rental accommodations were defined and not listed as permitted uses in any zones within the City of Markham in 2018, effectively prohibiting them. The City's Official Plan does contemplate permission on a site-specific basis through application, but a brief search of our application history doesn't show any applications have been received in this regard.

A primary reason that Council decided to prohibit short term rental accommodations was the proliferation of party houses. These were older houses purchased for possible future redevelopment but were rented out in the interim by groups for large parties. These became a nuisance to the neighbouring residents. Concurrent with the prohibition on Short Term Rental Accommodations, the City passed a nuisance by-law to further minimize the impact of these types of parties in general.

Short term rental accommodations can exist in many forms including but not limited to individual room rentals, rental of additional suite, or whole house rentals. The use of whole houses or legal second suites solely as short term accommodations would eliminate their availability for use as a housing unit. There are many factors that influence the housing market, so it would be difficult to isolate the impact of the prohibition on short term rental accommodations specifically, however several studies draw a direct correlation between housing availability or supply, and housing affordability.

Markham Staff have not received direction from Council to modify the City's position on short term rental accommodations.

Thanks

Arvin

I want members of Council to keep this in mind as the upcoming discussion of the *More Homes, More People* consultation approaches and the potential of a new By-Right zoning amendment allowing up to four storeys within an MTSA is considered.

Closing thoughts

With Richmond Hill possessing the least frequent GO train service of all corridors and the Newkirk Local Center and surrounding neighbourhood a lower hierarchy of bus service (local vs. Viva Rapid), I think Council needs to take a step back on the level of density being recommended for the Newkirk Local Centre and nearby residences within this MTSA.

It's very clear that based on Metrolinx's forecasts – driven by CN's ownership of key rail track and the expansion of the TTC subway – that these targets are too high.

Council does have options available to it. It could make any increase in density contingent on an investment by the provincial and federal governments in rail separation north of the Doncaster Diamond along with minimum standards of transit service (such as GO rail service every 20 minutes during rush hour up to 9 a.m. and later in the evening and the addition of YRT BRT).

However, my guess is that they will be reluctant to make such an investment since there will be an overlap in the coverage area between the Richmond Hill GO train and the TTC subway. If only minor service increases are planned through 2041 as per the GO Rail Station Access document, then it's imperative Council take another look at the density being proposed in the Newkirk Local Center and surrounding neighbourhoods.

As I shared in my submission last June, while plans can be changed, approved development projects are permanent. So, extreme care and caution should be used in approving any official plan amendments.