

Submission for City of Richmond Hill Council Meeting – October 22, 2024

- **Agenda item SRPBS.24.111 – City Files MOPA-24-001 and MZBA-24-001**

Submitted by: Michael Theodores – October 21, 2024

Opening comments:

As a long-time resident of Richmond Hill, I have demonstrated a strong interest in the planning and development of the town – and now city – for well over a decade.

I've provided multiple submissions to Council re: proposed developments in my neighbourhood along with a recent submission (on September 17, 2024) re: the Comprehensive Zoning By-law Project – Phase 2.

The submissions always include a discussion of transit – a topic that I have extensive first-hand experience with that is supplemented by references to documents and correspondence with provincial agencies such as Metrolinx and York Region Transit.

This submission marks my latest interest – and also concern – with a proposal that would represent a major shift in the planning process: **By-Right zoning**.

What follows is a discussion of why I feel that while gentle density belongs as a part of the planning process, **residents should continue to have input in all planning applications**.

Serious concerns re: consultation:

During the month of June 2024, I came across an article through a random visit to the yorkregion.com website about Richmond Hill's *More Homes, More People* consultation. As this was my first knowledge of the consultation, I sent an email to members of Council (including Mayor David West) on June 14, 2024, expressing my concerns with the lack of proper notification and awareness of this very important consultation.

I pointed out that shortly before reading this article, I received print newsletters from the city (myRichmond Hill) along with Councillors DiPaola, Chan and Cilevitz by mail. **None referenced this consultation – whether through details about exact dates of the consultation or at least a heads-up about upcoming sessions and the online survey.**

Since that time, I have corresponded with members of Richmond Hill's planning department on several occasions to learn more about the consultation, including the engagement strategy. I was informed that signage was placed throughout the city and in various community centres but confirmed none were placed in the vicinity of the Richmond Hill GO station that was mentioned prominently in the online survey.

In reviewing the Engagement Summary Report that was prepared and included in the October 22, 2024 meeting material, I wasn't surprised to see such a low response to the online survey and three meetings. The report noted that:

- **159** online surveys were completed between June 4 and June 25
- **Six** people attended a June 4 meeting held at the Oak Ridges Community Centre
- **45** people logged on to a virtual session held on June 10, and
- **29** people attended an in-person public meeting on June 13 at the Elgin Barrow Arena Complex.

So, in all, about **239 people** responded to the consultation – in a city with a population of over **200,000!**

I think these results validate the concerns I expressed to Council and later to the planning department (including Gus Galanis) about the engagement tactics that were used.

Questions that remain outstanding include:

- Why was the consultation period so tight
- Why didn't the city and its vendor expand the engagement tactics to include raising awareness among residents at the busy Richmond Hill Centre bus hub – and at the Langstaff and Richmond Hill GO stations
- Why didn't it include some grassroots awareness activities at popular public places like Hillcrest Mall and Richmond Green
- Why wasn't signage placed at the Richmond Hill GO station like a joint federal government-Richmond Hill sign I noticed for an extended time during the summer about an infrastructure initiative (see photo below).



All of these tactics – combined with short briefs in city and Councillor newsletters timed with the consultation in June – would surely have generated more awareness and input.

Equally troubling, the summary report noted 'York Region Transit was contacted for comments, but none have been received as of the date of this report.' Considering transit is a key element of the By-Right zoning amendments being proposed – particularly in neighbourhoods near MTSAs – I would expect the YRT to be very interested in providing its input, particularly since its cost recovery has been very poor (low 40 per cent range).

Concerns re: online survey:

I was one of the **159** people who completed the online survey and I shared several concerns with the Richmond Hill planning staff through multiple emails about it. This included:

- Questioning why the Richmond Hill GO station was singled out at the very beginning instead of the more busy Richmond Hill Centre, which will also benefit from the future expansion of the TTC subway

- Providing just a **single question about transit** which could have provided very valuable insight into current travel patterns along with whether transit would be a stronger choice based on different factors (coverage area, frequency, cost, etc.)
- No identifiers from survey participants – even at a high-level, such as their ward – to learn more about the different viewpoints about the consultation based on the neighbourhood they reside in

It's my feeling this online survey focused too much on design and not enough on why people take or don't take transit, and if they would ever consider transit as their preferred choice – over a car – if they had this option, helping to address traffic congestion that is common on Yonge Street and arterial roads such as Major Mackenzie Drive.

I think this is important because **rapid transit** is mentioned often in material prepared as part of the Housing Accelerator Fund that is linked to Richmond Hill's *More Homes, More People* consultation. As I have discussed in my submissions to Richmond Hill Council, there is a distinct difference in transit on the Yonge Street and Highway 7 cores and local and regional roads that serve the rest of the city.

This divide will become even more distinct on November 3, 2024 as I noted a [service update on the York Region Transit \(YRT\) website](#) that Viva Blue bus service on Yonge Street south of Bernard will improve:

- From every 12 minutes to every nine minutes during morning rush hour
- From every 18 minutes to every 12 minutes midday, and
- From every 14 minutes to every 10 minutes during the afternoon rush hour.

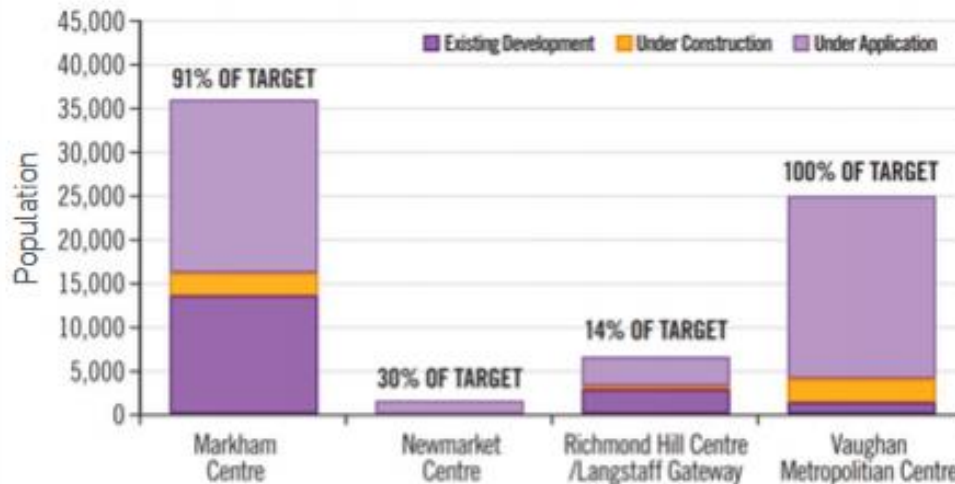
These service levels are far superior to the frequency served by YRT local buses on roads such as Major Mackenzie Drive East for example and of course the GO Train service on the Richmond Hill corridor (see screen cap of schedule below).

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→ Trips Number Numéro du parcours	Richmond Hill 98 Bloomington GO	Dp Richmond Hill 78 Gormley GO	Richmond Hill 50 Richmond Hill GO	Thomhill 60 Langstaff GO	North York 5 Old Cummer GO	North York 5 Ortoto GO	Toronto 2 Union Station	Ar	
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→ Trips Number Numéro du parcours	Toronto 2 Union Station	North York 5 Ortoto GO	North York 5 Old Cummer GO	Thomhill 60 Langstaff GO	Richmond Hill 50 Richmond Hill GO	Richmond Hill 78 Gormley GO	Richmond Hill 98 Bloomington GO	Ar	
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		

I raise the difference in transit service levels to highlight that not all MTSAs within Richmond Hill are equal and therefore having a single By-Right zoning approach is questionable.

Additionally, Richmond Hill is under increased pressure to add density that can help support the future expansion of the TTC subway to the Richmond Hill Centre-Langstaff Gateway. According to the [YRT's 2021-2025 Business Plan](#), this part of the city has much ground to make up to match the York Region Centre's of Vaughan and Markham (see screen cap below).

FIGURE 5. POPULATION BY STATUS OF DEVELOPMENT IN YORK REGION'S CENTRES



Source: York Region Planning and Economic Development and Local Municipal information

Unlike the Vaughan Metropolitan Centre – which is now marked by multiple skyscrapers – this is an excellent opportunity to add some gentle density to what will be an influx of high-rise projects, providing increased choice and affordability.

Additionally, it is also a great opportunity to add gentle density to each Viva Rapid bus stop that will serve as a quick, seamless feeder system to reach the new TTC station and onward to Toronto and back.

Concerns about unintended consequences

In my September 17, 2024 submission for the Council meeting to discuss the '**Comprehensive Zoning By-law Project – Phase 2**', I raised the issue of 'unintended consequences.' This discussion related to short-term rental accommodations or STRAs.

In my submission, I shared how I noticed during this review that there was nothing in place to prevent an individual or company from using a property as a STRA provided the property is occupied (in some form) by the owner.

While it was pointed out to me by Anna Henriques of the planning department that some people rent out parts of their home to help afford it which I understand, I expressed concerns that if future planning amendments don't address STRAs, there is the potential of creating an unintended consequence – individuals or companies taking advantage of By-Right zoning to purchase low-rise homes and expand them for profit, including as short-term rentals.

Already, STRAs seem to be plentiful in Richmond Hill based on quick Air bnb and Vrbo Google searches (see screen caps on following page).

airbnb

Rich

Your search | Rooms | National parks | Amazing views | Amazing pools | Chef's kitchens

Over 1,000 places in Richmond Hill

Home in Richmond Hill ★ 4.96 (56)
Place You Want To Stay at With Tons of...
Free cancellation
\$140 CAD \$127 CAD night · \$253 CAD total

Bungalow in Richmond Hill ★ 4.93 (73)
Newly renovated 3 bedroom Bungalow Free...
4 beds
\$212 CAD \$191 CAD night · \$382 CAD total

Vrbo

Where to?
Richmond Hill, Ontario, Canada

Dates
Oct 28 - Oct 30

Filters | Popular | Price | Rooms & spaces | Sort by recommended | Compare properties

232 properties
How our sort order works

Richmond Hill is popular!
Only 14% of properties are available on our site for your dates.

Newly renovated 2 bedroom suite lower level.
Sleeps 4 · 2 bedrooms · 1 bathroom
CA \$119
CA \$327 total
includes taxes & fees
9.4 Exceptional
6 reviews

Cozy 2BR Apartment Basement in Heart of Richmond Hill
Sleeps 4 · 2 bedrooms · 1 bathroom
CA \$85
CA \$290 total
includes taxes & fees
7.2 Good
5 reviews

As it stands, I don't see any discussion or conditions in this consultation that could prevent an individual or company from purchasing a low-rise home, expanding it to four storeys, and using most of the property as a STRA.

As a result, this would do little to achieve what Council – and the province and federal government – are attempting to achieve: **more homes for more people**,

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

Since that submission, I came across a [federal government announcement on October 8, 2024](#) about revised mortgage insurance rules beginning in January 2025 for homeowners interested in adding secondary suites to their properties which is another form of gentle density.

One of the conditions of the new rules would be that the **'additional unit(s) must not be used as a short-term rental.'**

So, it's clear the federal government shares Markham's concern about the impact STRAs have on housing availability and in turn, affordability.

I think Richmond Hill should follow Markham – and the federal government's – lead and forbid STRAs in any new zoning amendments that are approved – particularly any projects involving funds from the HAF. Otherwise, there is the possibility the *More Homes, More People* initiative could become the *More Homes, More Tourists* program which is not the objective of City Council or the provincial or federal governments.

One added point: I noticed several residents who did participate in the online survey and in-person meetings raised the same concerns about the link between investors and housing affordability (see the engagement summary report).

So, as this is a concern shared by other residents, I think it needs to be reviewed further (I had an opportunity to briefly view the September Council meeting that discussed the Comprehensive Zoning By-law Project – Phase 2 and noticed the discussion among several members of Council – including the Mayor – in which they shared existing concerns they heard from residents about STRAs throughout the city – perhaps sparked by my submission).

Opportunities exist – let’s examine them!

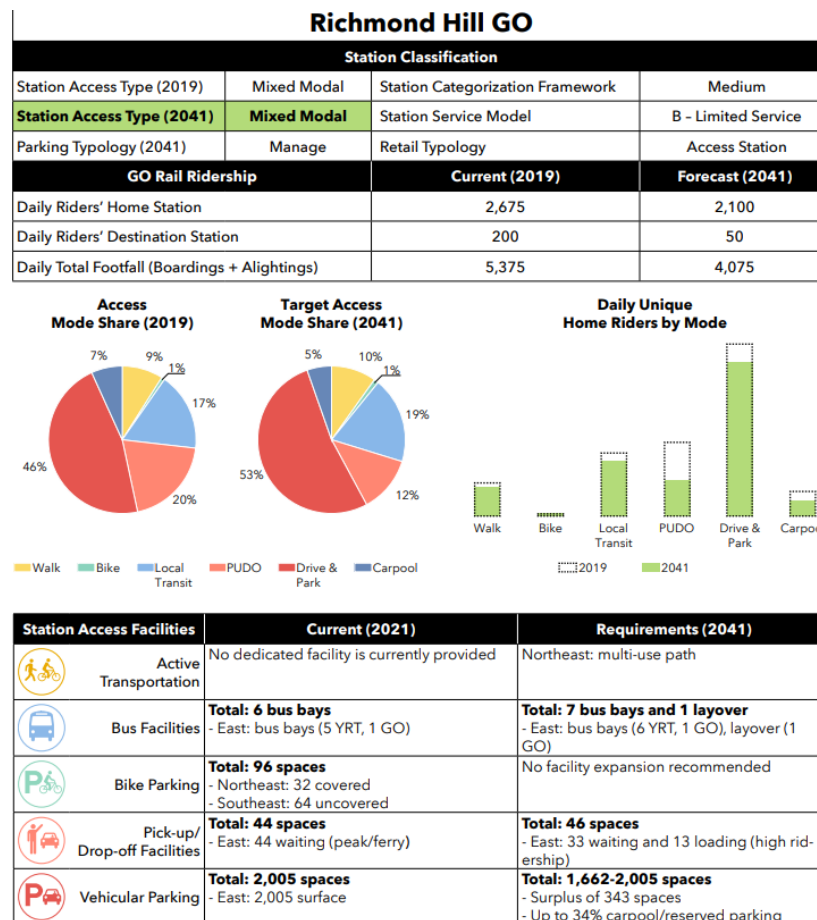
In a [best practices document](#) I came across for the *More Homes, More People* initiative, I saw the word **rapid transit** used several times. This includes neighbourhoods in close proximity to MTSAs.

The best practices document also recommended conducting an ‘inventory and assessment of surplus and underused municipal land’ and I didn’t see any discussion of this in the documents prepared for the October 22, 2024 Council meeting. If this has been done, it would be of value to know where these surplus lands lie and if they could serve as initial sites for the HAF.

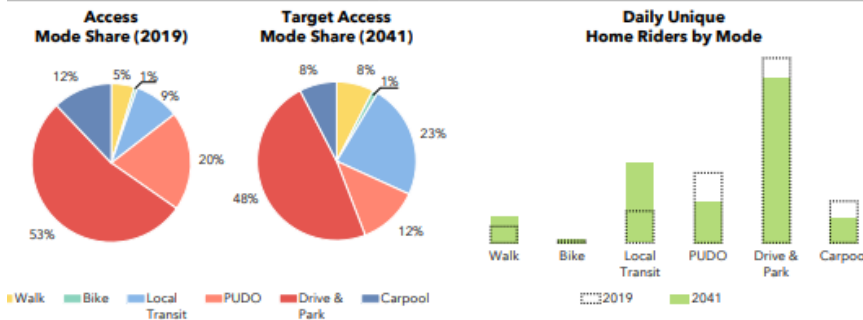
During my correspondence this year with Metrolinx – after reviewing the GO Rail Station Access document – I learned that Metrolinx owns the Richmond Hill GO Station parking lot and part of the Langstaff GO Station parking lot.

In the GO Rail Station Access document, it noted that there are **343 surplus parking spaces** at the Richmond Hill station and **171 surplus parking spaces** at Langstaff (see screen caps below and on following page).

Both could serve as excellent locations for an initial test of gentle density within these MTSAs, taking into consideration the limited service the Richmond Hill GO corridor offers. It would represent a groundbreaking (pardon the pun) partnership between the federal government (through the HAF), provincial government (providing the land fee-free or a nominal charge through Metrolinx) and the city (through a special, By-Right amendment along with funds allocated through the city’s HAF).



Langstaff GO			
Station Classification			
Station Access Type (2019)	Interchange	Station Categorization Framework	Interchange (Medium)
Station Access Type (2041)	Interchange (Mixed Modal)	Station Service Model	B - Limited Service
Station Typology (2041)	Manage	Retail Typology	Access Station
GO Rail Ridership		Current (2019)	Forecast (2041)
Daily Riders' Home Station		1,625	1,600
Daily Riders' Destination Station		100	1,750
Daily Total Footfall (Boardings + Alightings)		3,250	6,325



Station Access Facilities	Current (2021)	Requirements (2041)
Active Transportation	No dedicated facility is currently provided	- South: pedestrian pathways
Bus Facilities	Total: 11 bus bays - Northwest: bus bays (3 GO, 8 YRT)	Total: 24 bus bays and 4 layovers - Northwest: bus bays (9 GO, 15 YRT), layovers (4 GO)
Bike Parking	Total: 96 spaces - North: 64 covered - South: 32 covered	No facility expansion recommended
Pick-up/Drop-off Facilities	Total: 40 spaces - North: 20 waiting and 5 loading (peak/ferry) - South: 12 waiting and 3 loading (peak/ferry)	Total: 48 spaces - North: 23 waiting and 5 loading (peak/ferry) - South: 15 waiting and 5 loading (peak/ferry)
Vehicular Parking	Total: 1,131 spaces - North: 711 surface - South: 420 surface	Total: 960-1,131 spaces - Surplus of 171 spaces - Up to 37% carpool/reserved parking

In preparing this submission, I also noticed on the City's website a consultation on the land surrounding the [Richmond Hill Public Library](#) at the corner of Major Mackenzie Drive East and Yonge St.

In taking a quick scan of the surrounding size of the land, I was surprised at how much available land there is, particularly facing Yonge Street. Perhaps the city should consider adding a housing component to this review as it would provide walking distance to a great cultural attraction along with easy access to transit going in four directions, including the Viva rapid service.

Finally, if Council is leaning towards implementing By-Right zoning but shares the reservations I have in excluding residents from the planning process going forward, it could create a **'Hybrid By-Right'** approach. This could involve eliminating the usual public meeting to solicit comments from the public and move to a final meeting in which residents could provide comments in advance of a meeting in which Council would decide on the merits of a planning proposal.

Closing thoughts:

With such an important planning amendment (By-Right zoning) being considered by Council, I think the city has erred in the engagement tactics it used during the month of June 2024.

The results from the online survey and in-person and virtual sessions speak for themselves. Less than **1%** of the population provided its input and even the region's transit authority didn't respond.

With such an important shift in planning policy at stake – along with taxpayer funds through the Housing Accelerator Fund – it's vital that residents continue to help shape the future of the city's planning just like it has in the past.

My recommendation is that the city extend this particular phase through the rest of the year and make a stronger effort to consult residents to ensure more voices are heard.

If Council decides to proceed with By-Right zoning amendments for additional residential units and up to four storeys near MTSAs, then it should seriously consider adding conditions for these amendments, including restricting STRAs and placing a higher priority on projects that benefit directly from rapid transit. This would ensure funds from the HAF are well spent, and are contributing to the goal of providing more homes for more people while supporting transit.

-Michael Theodores