

**Submission for City of Richmond Hill Council Meeting – December 4, 2024
re: SRPBS.24.122 - Request for Approval - Official Plan and Zoning By-law
Amendments to permit Additional Residential Units and Four Storey
Building Heights in MTSAs - City of Richmond Hill - City Files MOPA-24-
0001 AND MZBA-24-0001**

Submitted by: Michael Theodores – December 2, 2024

Opening comments:

This submission is a follow-up to a submission that I provided for an October 22, 2024 Council meeting to discuss the proposed amendments to the Official Plan and Zoning By-law to permit Additional Residential Units and Four Storey Building Heights in close vicinity to MTSAs.

I had an opportunity to review the staff report that will be discussed at the December 4, 2024 meeting and what follow are comments in reaction to several points included in the report.

Monitoring of ‘as-of-right’ developments murky

I found the discussion on Page 7 of the staff report of what would occur if the By-right zoning of a project was approved very murky, including the following excerpt:

As-of-right zoning permissions does not, however, eliminate the need for detailed review of developments requiring Site Plan approvals, draft Plan of Subdivision approval, Consent applications nor draft Plans of Condominium which are required for residential developments where more than ten residential units are approved or for non-residential developments.

What is missing is what information would flow to neighbourhood residents for projects that take advantage of By-Right zoning. Would they receive notification in advance of a project and have an opportunity to express any concerns related to traffic or other community aspects like school capacity? Or, confirmation that the city reviewed the proposal and it met or didn't meet all conditions?

More clarity is required for what the notification process will be to residents impacted by a By-Right zoning proposal.

Public engagement

I'm glad that the planning department captured my concerns in their summary of comments received from the public and council during the meeting, including a submission I provided on October 20, 2024.

I stand by these concerns and was disappointed to see members of Council – including the Mayor – attribute the poor response to the hectic lives people lead. I would argue that when residents are properly informed of a major development in their neighbourhood or the city, they respond in large numbers to provide their input.

In my October submission, I expressed concern that Council was moving forward with a decision about the planning amendments with such a low response rate (completion of only **159 online surveys** and **80 people** in total that attended two in-person and one virtual meeting).

I argued that one of the poor reasons for this low response rate were the engagement tactics that were used, including a lack of signage in the vicinity of one of the key MTSAs listed – the Richmond Hill GO station at Major Mackenzie Drive East and Newkirk – that would have been seen by thousands of residents travelling East-West on Major Mackenzie Drive East or to and from the station.

The staff report cited a website page that provided details about the consultation but no metrics related to website visits were disclosed. Social media posts were also mentioned but in my review of these posts on X (formerly Twitter), they were equally low. According to my review:

- The May 31, 2024 X post received **496 views**
- The June 3, 2024 X post received **477 views**
- The June 7, 2024 X post received **848 views**, and
- The June 10, 2024 X post received **302 views**

Considering Richmond Hill has a population of approximately **200,000 people**, I question just how effective the city's engagement strategy has been for this major public consultation.

An additional concern is these efforts weren't done strictly in-house by City of Richmond Hill staff but also included a vendor contracted to assist with tactics and implementation of the consultation. This included an online survey that was very light on transit-related questions even though transit is one of the key reasons council and the province are encouraging intensification near transit, including gentle density through By-Right zoning.

Considering the major departure of the usual planning process that would occur if By-Right zoning occurs, I strongly believe a more robust engagement strategy should have been prepared and rolled out. **I would argue that the low response rate may be attributable to a lack of awareness rather than a lack of interest in participating in the process.**

Not only would this have provided the opportunity for more feedback from residents to the consultation but also awareness ahead of any amendments that are approved – something the city may find is an issue when By-Right zoning goes into effect and residents express a lack of awareness about the new process.

A final point: I was surprised to receive a proactive email about this meeting through a 'zoning@richmondhill.ca' email address that was sent by the planning department. This is exactly the type of advanced notification that I think the city should be implementing in the future for residents who have shown an interest in particular planning issues.

As it stands, my experience has been the city is not effective at **pushing out** communications, requiring residents to **pull** details through emails. I will note, though, that I have received very good responses from Gus Galanis' planning team to my emails though they take a greater effort – one that many residents may not be inclined to take.

Short-term rental accommodations/dated technical paper

In my submission in October, I discussed one of the potential unintended consequences of the By-Right zoning amendments being considered, including for four-storey developments.

I expressed concerns about how investors could potentially purchase low-rise homes, expand them to four-storeys, and use them primarily as short-term rental accommodations (STRAs) due to their lucrative revenue stream. However, this would serve to negate the impact on housing shortages/affordability that these amendments are trying to achieve.

In reviewing the report prepared for the December 4 meeting, I saw a reference and link to a **technical report** – dated May 2022 – on this subject. Before reviewing it, I connected with Salvatore Aiello from planning to see if any studies or additional research had been conducted since that time and the answer was **no** – that it would be part of the comprehensive planning review next year.

This is unfortunate as the report is very dated. Here's why:

- At that time, it was determined that there were about **582 listings** on sites such as Airbnb as of the second quarter of 2022. Complete a simple scan now and there are well over **1,000**.
- The average rate for a listing in 2022 was about **\$74 per night**. Complete a scan now and many are well **over \$100**.
- At that time, the chief concerns about residents were nuisance, noise and parking – all valid issues. Currently, along with these enduring concerns, there is a concern about how STRAs impact housing stock and affordability – for both long-term rentals and for those interested in purchasing a home.

Re: the latter point, well-respected pollster Nik Nanos recently conducted a [survey on STRAs](#) and the findings were very interesting. This included that a majority of Canadians think short-term rental properties have a negative or somewhat negative impact on:

- **Housing availability** (23% somewhat negative; 51% negative)
- **Rent prices** (27% somewhat negative; 44% negative)

Additionally, three in five Canadians would support (39%) or somewhat support (23%) limiting commercial short-term rentals and Canadians are more likely to think the cost to rent an apartment in their neighbourhood would go up (47% – a significant increase from 28% in 2018.)

Just as interesting is the perspective of the younger demo – the one struggling the most with housing affordability. According to the study:

- Most youth aged 18-34 (64%) support or somewhat support limiting commercial short-term rentals.
- Nearly three in four believe that short-term rental platforms negatively impact housing availability (20% somewhat negative and 53% negative) in their communities, and
- Additionally, 52% of youth believe that the cost of renting an apartment in their neighbourhood would increase due to the presence of short-term rentals.

This is important because studies like a [December 4, 2023 report from Desjardins](#) indicate that STRAs have an impact on housing stock, vacancy rates, and rents – all of the issues that cities like Richmond Hill and the provincial and federal governments are actually trying to address.

As the report noted on Page 3, '**research has established that there is a relationship between the prevalence of STRs in a community and higher rents for LTRs.**' (LTRs is short form for long-term rentals).

Additionally, in its conclusion on Page 4, the report noted '**The rise of STR platforms has had a significant impact on affordability and availability in housing markets around the world, removing units from the rental and resale markets.**'

Meanwhile, our York Region cousins in Markham took the initiative in 2018 to ban short-term rental accommodations, providing them with an edge over Richmond Hill in ensuring any new housing stock that is created through By-Right zoning has an enhanced chance of succeeding.

In making a decision on the By-Right zoning amendments, Richmond Hill Council – led by Mayor David West – should request the planning team to renew its review of short-term rental

accommodations to guard against investors – not existing or new residents interested in renting or purchasing a home – from benefitting from these amendments.

Ideally, it would have been wise to include an updated review of STRAs within the consultation on By-Right zoning. As I have been advised that this review will take place next year, it's imperative Council direct staff to develop an action plan that includes revised studies and also a meaningful consultation with residents.

To rely on a dated technical report is only likely to result in a new problem requiring a solution instead of a solution to an existing problem.

MTSAs/higher order transit

The staff report also touched on my concerns about why the Richmond Hill GO station was prominently mentioned in the online consultation survey and these concerns remain.

As I have made very clear in multiple submissions to Council over the past year, the Richmond Hill GO corridor suffers from the worst number of trips and frequency of all corridors. There are only **five weekday** Southbound runs to Toronto in the morning that end at 8:11 a.m. and only **five weekday** evening Northbound runs from Union Station to Richmond Hill that end at 6:45 p.m. **There is no service on weekends or holidays.**

Yet, the Richmond Hill GO train line continues to be referenced as 'higher order' transit like the Viva bus service that runs through dedicated lanes on Yonge Street and Highway 7 seven days a week and as frequently as nine minutes on Yonge St. during weekday rush hour periods.

Meanwhile, the long day of commuting for Richmond Hill GO train riders just got slightly longer as of November 3, 2024. One of the more popular morning trips – the 7:25 a.m. train pre-pandemic – now leaves the Richmond Hill station for downtown Toronto at 7:11 a.m.

The popular 4:30 p.m. trip back to Richmond Hill from Union Station pre-pandemic now leaves at 4:45 p.m. As a result, that has added **29 minutes** to the daily commute – an issue for those with child or elder care, or who just want to leave home later in the morning and return home earlier.

With re: to the reference in the staff report about 'transit facilities that currently exist and/or planned along these corridors', I've confirmed recently with both Metrolinx and York Region Transit that no material upgrades are planned in the near future for either the Richmond Hill GO train or YRT bus service along Major Mackenzie Drive East – unlike the expansion of the TTC subway to Richmond Hill Centre in the future or the Viva bus service that was recently upgraded to nine minute frequency during rush hour.

I will continue to raise the issue of the discrepancy in the quality and frequency of transit as we progress in the New Year to the Housing Accelerator Fund to ensure these taxpayer dollars are prudently used.

Review of surplus public land

I was glad to see the staff report also touched on my suggestions of doing a thorough review of surplus land that exists in Richmond Hill to help address housing stock, affordability and also the gentle density that is referenced in the By-Right zoning review.

You may recall how I shared that I reviewed [Metrolinx's 2023 GO Rail Station Access](#) document and noted there are surplus parking spaces cited for both the Richmond Hill GO station and the Langstaff GO station. It was confirmed through executive correspondence received back from Metrolinx that parts of the parking lot are provincially-owned.

While the staff report for this review indicated staff were in the midst of reviewing excess land, I reached out to the Richmond Hill planning department to see if any discussions have been made with Metrolinx about scoping out these surplus parking spaces which are a short walk to each platform. I was disappointed in the response.

According to a November 25, 2024 email I received from Phoebe Chow, **'We have not been approached by Metrolinx on potential partnership. Should the opportunity arise, City staff would explore it with the Province.'**

As the city and Council moves forward with the Housing Accelerator Fund review in 2025, I encourage the Mayor and Council to take the initiative and connect with incoming interim Metrolinx President and CEO Michael Lindsay to see if Metrolinx would consider either gifting – or providing for a nominal fee – the land where these excess parking spaces lie as part of a special **municipal-provincial-federal partnership**.

Under such a scenario, the land would be provided by the province and the City of Richmond Hill would draw funds from its portion of the federal government's Housing Accelerator Fund. A rare win-win-win.

To make this happen, it's vital the Mayor and Council step up to the plate and initiate talks and not wait for Metrolinx to approach it. With new senior leadership in place, this is a great time to make such a move.

Opportunities to collaborate with community organizations

In preparing this latest submission, I came across this [Toronto.com article](#) about the CHATS organization and its focus on helping Richmond Hill seniors age in place. The article highlighted the challenge many seniors in our city are having in remaining in the home they know and love.

Since developers don't seem interested in building smaller homes that could serve their needs, perhaps there is an opportunity to see if the city could team up with an organization like CHATS that could replicate an initiative like the University of Toronto's [SpacesShared initiative](#).

I noticed that while the city has a technical paper on aging in place, strangely an organization like CHATS didn't appear to be consulted. It's time to explore such an initiative that could make better use of housing that already exists.

Closing comments

While Council – supported by members of the planning staff – indicated at the October 22, 2024 meeting that they were bound by provincial legislation with respect to considering By-Right zoning amendments, I think there are several measures still within their purview.

- It could have included more transit-related questions in the online survey to demonstrate to the province the increase investments required to boost service on the Richmond Hill GO corridor to make it truly a 'higher order' form of transit – and not just during the morning and evening rush-hour period
- It could have provided more notice to residents about this consultation in core communications products such as the Spring-Summer print issue of the myRichmond Hill newsletter and Councillor newsletters that were mailed out shortly before the consultation
- It could have extended the consultation to longer than a three-week period, noting the major departure from the planning process that currently occurs (including public information meetings), and

- It could have created signage in the key MTSA's at the Richmond Hill and Langstaff GO stations to engage riders of these lines about their current experience with service and-or interest in housing in close proximity to these stations

As we proceed to the Housing Accelerator Fund meetings next year, I look forward to seeing if some or all of my suggestions are explored.

-Michael Theodores