

March 18, 2025

**Mayor David West and Members of Council**  
**City of Richmond Hill**  
225 East Beaver Creek Rd.  
Richmond Hill, ON  
L4B 3P4

Sent via email to [clerks@richmondhill.ca](mailto:clerks@richmondhill.ca)

**RE: March 19, 2025 Committee of the Whole**

**Item 11.10 | SRPBS.25.029 - Request for Approval - Comprehensive Zoning By-law (Centres and Corridors) and Accessible Parking By-law - City of Richmond Hill - City File MZBA-23-0001**

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The Building Industry and Land Development Association (BILD), along with our York Forum members, acknowledges receipt of Item 11.10 (SRPBS.25.029) - *Request for Approval: Comprehensive Zoning By-law (Centres and Corridors) and Accessible Parking By-law*, as presented on the March 19th Committee of the Whole agenda. We appreciate the opportunity to provide this correspondence.

Following discussions with our York Forum members, the development industry has raised concerns regarding the **Electric Vehicle (EV) Parking Provisions**, particularly for Apartment Dwellings and Stacked Townhouse Dwellings within a building with a parking structure. As outlined in Table 10.13A: Electric Vehicle and Electric Bicycle Minimum Provisions of the draft Comprehensive Zoning By-law, **the City is proposing that 100% of all provided parking spaces shall be EV-Ready.**

This requirement presents significant challenges for feasibility and implementation. We strongly recommend further discussions to explore practical alternatives that align sustainability goals with development feasibility. Additionally, Ontario's housing crisis continues to place unprecedented strain on the industry, making both building and selling homes increasingly difficult, especially for high-rise. Consumer demand has slowed dramatically, while construction costs have reached record highs, exacerbating affordability challenges. Addressing these issues collaboratively is essential to ensuring new housing remains viable and accessible.

At a minimum today, BILD strongly recommends the inclusion of a transition provision for EV parking requirements to ensure that projects already well advanced in the approvals or permitting process are not disrupted. Without such a provision, developments currently underway could face significant delays, cost increases, and design challenges, further hindering housing delivery.

Further to this, could the City clarify its interpretation of Bill 185 regarding EV-Ready parking requirements? Specifically, while the City states that EV-Ready is not mandated, it appears that any voluntarily provided parking must still comply with EV-Ready provisions. This effectively results in a mandatory requirement, which seems to circumvent the intent of Bill 185. Can the City confirm whether this approach aligns with the legislation, and additionally, clarify whether the authority to mandate EV infrastructure falls under zoning regulations or is solely governed by the Ontario Building Code?



As committed partners in shaping strong, vibrant, and sustainable communities, BILD members take pride in building in the City of Richmond Hill. We appreciate the opportunity to provide this correspondence and look forward to continued collaboration with staff on this bylaw update.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Mortelliti". The signature is fluid and cursive, written over a light grey horizontal line.

Victoria Mortelliti, MCIP RPP  
Senior Manager, Policy & Advocacy

CC: BILD York Forum Members  
Deborah Giannetta, City of Richmond Hill

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*The Building Industry and Land Development Association is an advocacy and educational group representing the building, land development and professional renovation industry in the Greater Toronto Area. BILD is the largest home builders' association in Canada, and is affiliated with the Ontario Home Builders' Association and the Canadian Home Builders' Association. It's 1,200 member companies consists not only of direct industry participants but also of supporting companies such as financial and professional service organizations, trade contractors, as well as manufacturers and suppliers of home-related products.*