

From: mplanning

Sent: Sunday, November 21, 2021 3:29 PM

To: Clark, Carol <Carol.Clark@york.ca>

Subject: DEVELOPMENT SERVICES COMMITTEE input to Regional MCR and updated ROP

Please have this letter provided to members of Regional Council and relevant staff related to Item F.2 on the November 25th Council Agenda. The matters addressed in the letter are relevant to the Draft Regional Official Plan. Thank you.

Regards,

Michael Manett

MPLAN Inc.



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&
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November 10, 2021

Via email to:

Sybelle von Kursell
City of Richmond Hill Planning and Infrastructure Department
City of Richmond Hill
225 East Beaver Creek Road
Richmond Hill, Ontario L4B 3P4

Re: City of Richmond Hill Municipal Comprehensive review (MCR)
<https://www.richmondhill.ca/en/find-or-learn-about/official-plan-update.aspx>
Overview Comments regarding CityPlan 2041 process, in advance of Staff Policy
“Key Directions Report”

Dear Sybelle,

As a land use planning consultant, I have acted for numerous landowners, residents' associations, as well as the Town/City of Richmond Hill, since the mid 1980's and my work has included working with, and actually preparing Official Plan and Secondary Plan policies for Richmond Hill. I am currently representing 15 different landowners who are undertaking various land use and development projects (each at different stages) ranging from single lot redevelopment through mixed-use, medium density and high-rise development projects to major Secondary Plan stakeholder participation through redevelopment and 500-acre boundary expansion efforts.

Since the early 2000's I was involved in municipal ORMCP conformity exercises and thereafter several aspects of the new Regional Official Plan (ROP) 2010 and the Town (now City) of Richmond Hill Official Plan 2010. I have also been involved in multiple OMB/LPAT/OLT hearings involving matters along the Yonge Street Intensification Corridor. More recently I continue to be involved in both the Region's and City's MCRs.

I have also been a participant in the City's housing affordability process¹, (the results of which were not accepted by City Council in July 2021) and the Region's assessment of its housing supply through a 2021 report by Watson & Associates.²

A critical analysis of these reports has yet to occur. Therefore, the greatest of care should be taken before accepting any of the projections or statements in such reports and elevating them to “findings” especially where the source or data have not been verified or are stated to be from internal sources.

¹ <https://www.richmondhill.ca/en/find-or-learn-about/affordable-housing-strategy.aspx>

² <https://www.york.ca/wps/wcm/connect/yorkpublic/dc55713d-ac43-48f2-8288-5d9035d5e086/York+Region+Foundational+Housing+Analysis+-+Final+Report+2021.pdf?MOD=AJPERES&CVID=nx11Bu1>

As noted below, I have copied Paul Freeman, Chief Planner for the Region, as my comments herein apply equally to the ROP and the Region's MCR process.³

A. The MCR should include a critical review of the success and shortcomings of the 2010 Official Plan, and provide options to “course correct” given the changes that have occurred during the past (almost) 12 years.

The City's current MCR process is intended to provide an update to the City's Official Plan, in order to ensure conformity with recent PPS and Growth Plan requirements, including accommodating future growth assigned to it by the Region. However, in order to move forward from the 2010 Official Plan to CityPlan2041, the MCR process (background research) should have included the incorporation of analysis of where the 2010 Plan policies failed and where the policies were successful. That exercise would highlight those parts of the Plan that require a complete rethinking or redo, rather than simply repair or update.

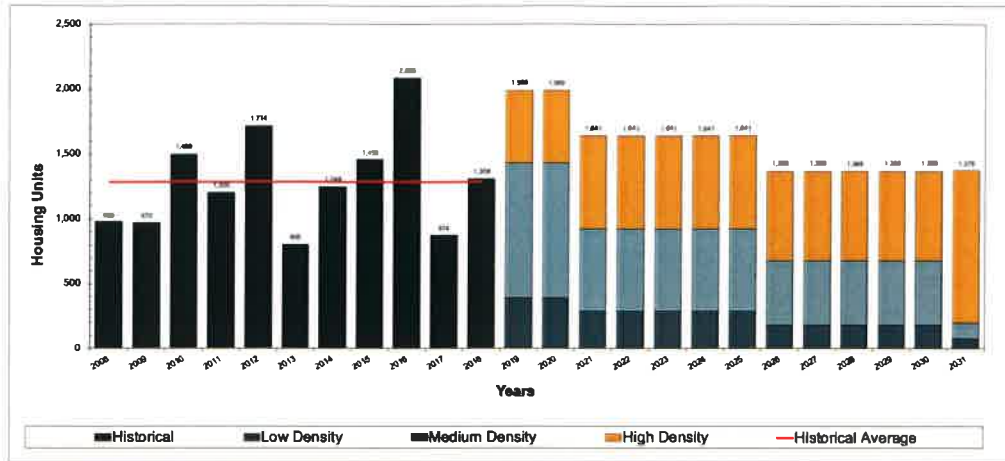
For example, the 2010 Official Plan was premised on achieving a certain population and employment (jobs) level by 2031. Indeed, several development charge bylaws (DC bylaws) were prepared by Staff, recommended for adoption and adopted by Council. These were then subject to litigation before the LPAT/OLT **based on growth assumptions which**, when translated into dwelling units, **have not been met**. As a result, **the supply of new residential units, especially apartment dwelling units, has not materialized in Richmond Hill** and especially along its Rapid Transit Corridor (Yonge Street).

Proper land use planning requires that both the Region and City take stock of, and confirm, just how far off course Richmond Hill is in meeting its growth forecasts and annual housing targets (delineated by unit/structure type) and *course correct*. CityPlan 2041 claims that Richmond Hill is to be the centre piece of York Region. *Below is a table prepared by the City's external consultant based on data supplied by the City. As part of the MCR process, the data should be updated and shared with all stakeholders and data sets evaluated.*⁴

³ The 1st draft of the ROP November 2021 was released for comment. See <https://yorkpublishing.escribemeetings.com/filestream.ashx?DocumentId=27547>

⁴ This would be essential background information to any housing needs or gap assessment.

Figure A – 1
Annual Housing Forecast¹

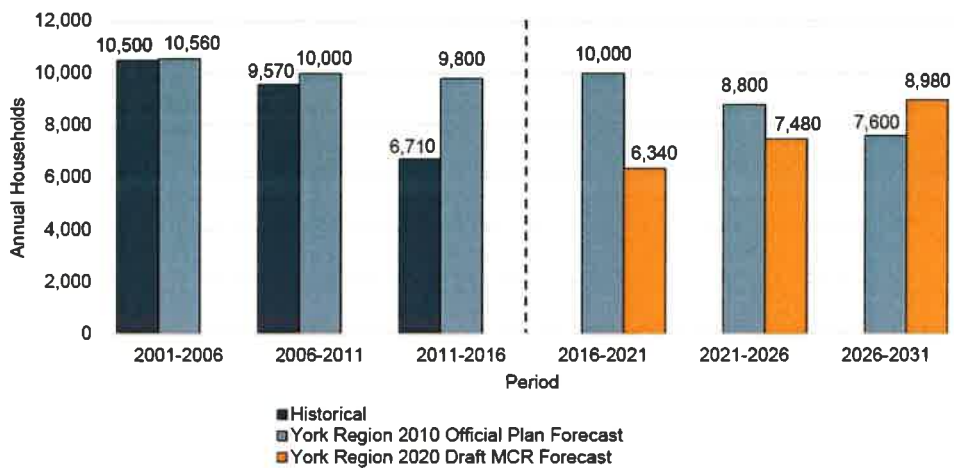


Source: Historical housing activity derived from building permit data received from the Town of Richmond Hill, 2008-2017.
¹ Growth forecast represents calendar year.

I am mindful of work already undertaken by the Region as part of its MCR. That work disclosed that the Region’s housing supply is tracking 33% below the ROP 2010 forecast. The question is, where does Richmond Hill fit into this and how is it tracking?

- Historical housing growth between 2011 and 2021 has been tracking approximately 33% below the York Region 2010 ROP households forecast; and
- In accordance with anticipated housing market demand within York Region and the broader market area, the phasing of annual housing growth in York Region over the next 10 years appears to be reasonable. It is noted that the 10-year housing forecast should be monitored against existing wastewater servicing constraints in York Region.

Figure 4-8
York Region
Draft MCR vs. 2010 Regional Official Plan Housing Forecast



Source: Historical based on Statistics Canada Census data. Forecasts derived from York Region 2020 draft MCR and 2010 York Region ROP. Figure by Watson & Associates Economists Ltd., 2020.

B. Planning Policy Documents and Zoning Bylaws contemplated in the 2010 OP have not been brought into force, nor implemented to create complete communities

Both the ROP and 2010 RHOP called for the preparation of Secondary Plans at specific locations along intensification corridors, including Key Development Areas (KDA's).

Unfortunately, for numerous reasons, none of these policy documents (or zoning regulations) are in place, and in several cases specific objection is taken to Staff's approach and the proposed policy framework, including zoning regulations.

The City's 2010 mantra was to "build a new kind of urban", through a made in Richmond Hill solution. The stated goal was to create 'complete communities', which by the current *Growth Plan* definition means:

Complete communities

Places such as mixed-use neighbourhoods or other areas within cities, towns, and *settlement areas* that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, **including** an appropriate mix of jobs, local stores, and services, **a full range of housing, transportation options** and *public service facilities*. *Complete communities* are age-friendly and may take different shapes and forms appropriate to their contexts. (emphasis added)

The City retained yet another external consultant to assist with its MCR. Many of the ideas and vision of the City's external consultant from Stantec, Mr. David Dixon, as expressed through his *Planning for Change* document and presentations made to Council and the public in 2021 are sound. But to date, it is not evident that City Staff are listening to his advice.

Monitoring & Data

Although through the ongoing planning processes at York Region and the City, a "Housing Crisis" has been declared, no "monitoring" data has been released by the City to demonstrate the extent of the current housing crisis in Richmond Hill that must be addressed through a new policy direction in CityPlan 2041. Many ongoing studies, including those for Transportation (Parking and Transportation Demand Management

Strategy) and Stratification remain incomplete,⁵ although they have been underway for some time, and other studies such as the Affordable Housing Strategy 2021, have not been well received and remain in flux. The lack of planning certainty does not bode well for future housing starts.

What appears to be emerging policy direction, to make Richmond Hill “future ready” in recognition of changing technology, has effectively been rejected by City and Regional Staff, evidenced by their positions taken at the OLT in 2020 and 2021 for the Yonge Bernard Secondary Plan area.

City (and Regional) Staff have opposed planning recommendations/solutions brought forward by landowner representatives as recently as earlier this year, only to be advised (as I read and listen to David Dixon) that we need to do these very things as part of the long-range planning strategy for the city.

Suggestions by NEC’s planning and transportation consultants for the northeast quadrant of the Bernard KDA, including use of private roads and stratification, eliminating minimum parking rates to provide for **zero car households**, were rejected by City and Regional planning and transportation staff.

Several Staff recommendations continue to undermine the ability of the private sector to construct (deliver) new housing units in support of complete communities along the Yonge Street Corridor.

A lesson to be learned from the Downtown Local Centre Secondary Plan process (DLC) is that no purpose is served creating or updating land use planning policies that have expressly been rejected by affected landowners as being outdated, unrealistic and not implementable. No development has occurred as a result of this lengthy and costly planning exercise.

If there is no support for planning policy by key stakeholders, including the owners of the land upon which future development is expected to occur, there will be no development that will result in “complete communities”. People will choose to go elsewhere, as they have started to do, according to Region and City reports regarding demographic trends.⁶

⁵ In October 2021, the City released a draft Secondary Plan for Richmond Hill Centre. There is no parking strategy associated with the draft Secondary Plan and stratification is subject to Council approval.

⁶ See page 31 of <https://www.richmondhill.ca/en/shared-content/resources/documents/Affordable-Housing-Strategy-Background-Report.pdf>

Promote the Creation of Zero Car Households

As part of the ongoing CityPlan 2041 process, there has been discussion about creating and maintaining the 15-minute complete community⁷ in order to support existing higher order transit, provide housing options and choice and address climate change.

The emerging policy direction should specifically promote and support the creation of **zero car households** at the centre of MTSA's and within a short (5 minute) walk to existing or planned *frequent transit service* or *higher order transit* corridors, by removing any minimum parking rate per dwelling unit⁸, an emerging trend in north American cities. These zero car households will have alternative mobility options supported by TDM plans that do not require a zero-car household to pay for the cost of constructing and maintaining a parking space or a vehicle to be located in the parking space. This results in more affordable housing units and support for the use of transit.

Stratification is Mandatory

Promoting Complete Streets does not mean the creation of new "traditional" public streets.

Several Richmond Hill secondary plans that I have been involved with, have promoted a fine grain grid network of public streets, in many cases, where they are not warranted and serve only to delay development, while promoting vehicular use rather than reducing it and providing for an inefficient use of land.

For the past 2 years, we have been told that the City is studying stratification arrangements (despite examples of stratified title arrangements already in existence in Richmond Hill). Until stratified title is, as of right, intensification along the Yonge Street corridor, which translates into new annual housing units, will not be realized, thereby prolonging the housing crisis in Richmond Hill⁹ and York Region.

Please take these comments as an overview of the ongoing CityPlan 2041 MCR process on behalf of the many individual stakeholders that I represent in Richmond Hill. We look forward to continuing our input to the ongoing planning work being done by both the Region and the City as you work towards the completion of your respective MCR

⁷ A concept now included in the Draft November 2021 ROP.

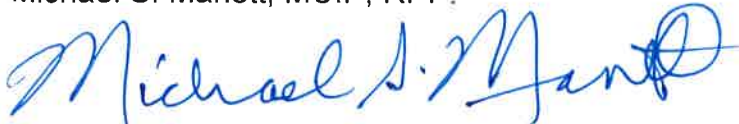
⁸ Proposed ROP policy 2.3.19 a) which mirrors the existing ROP 2010 policy concerning parking requirements, must be revised to include provision for zero car households.

⁹ See page 3 of <https://pub-richmondhill.escribemeetings.com/filestream.ashx?DocumentId=41821>

processes.

Yours truly

Michael S. Manett, MCIP, RPP.

A handwritten signature in blue ink that reads "Michael S. Manett". The signature is written in a cursive style with a large, stylized initial "M".

Per: MPlan Inc.

cc. Paul Freeman, Chief Planner, Region of York