From: jeffrey@landplanlaw.com

Sent: Wednesday, May 18, 2022 11:55 AM

Subject: May 19, 2022 - Special Committee of the Whole: Item F.2.1 – Draft Regional Official Plan Update (Submission on behalf of North Elgin Centre Inc.)

Chair Emmerson and Members of Regional CoW:

I represent NEC, the owner of lands at the northeast corner of Yonge Street and Bernard Avenue in the City of Richmond Hill.

Through our client's land use planner's submission (**see item/communication F.1.1.3** – submission by Michael Manett of MPlan Inc.), our client has identified many short comings with the proposed new ROP - as proposed to be amended in the version noted as revised Attachment 1 to Staff's report.

Staff's recommendation to Committee (CoW) is not appropriate at this time and is premature

It is not appropriate to approve Staff's proposed changes to the ROP and give Staff the green light since fundamental issues relating to planning policy and implementation remain to be addressed by Regional Council.

The Region is in a housing crisis. It has not met is 2010 growth targets. Significant DC increases and other charges will continue to impact the supply of new housing, including housing affordability and housing attainability.

The Committee should only receive Staff and Stakeholder comments and **direct Staff to** specifically respond to the outstanding information requests, and to provide planning responses to the planning issues raised on behalf of NEC (and other consultants as noted on Attachment 1 ID # 26, 43, 45, 55, 56, 58, 61, 72-6, 93, 136 - 141, 146, 162, 186 - 188).

Staff's report to committee is thin on planning analysis, and there is no explanation why Staff take, or are taking a certain position, on whether a policy should be amended, deleted or changed.

15 -Minute Complete Communities, Housing Affordability, & Reduced Vehicular Use and Parking Standards

The Plan does not promote any of the above objectives, but rather contains inconsistent policies, and in some cases no policy framework.

The term *housing options* has been used extensively with no real strategy currently in place to ensure housing options are achieved. Staff's response to this issue is: <u>The Affordable Private</u> <u>Market Housing Plan</u> will be developed in the future (Staff Report, page 7).

Why are taxpayer dollars being spent on more consultants reports when there are simple solutions to such problems including:

• Eliminated minimum parking requirements in close proximity to transit in order to support complete communities and housing affordability.

• Actively promoting the creation of zero car households – whose mobility needs will be addressed through active transportation options and technology.

Why is Regional Staff supporting new ROP policies that will have the effect of increasing the cost of housing while decreasing the annual supply of new housing?

The Regional Greenlands System (see Attachment 1 ID # above)

As drafted the policy and mapping are a mess.

Staff state the current mapping is based on approved local municipal natural heritage systems and/or data from conservation authorities. This statement is misleading.

Our client has been after the data sets that comprise the Greenlands system.

Staff refuse to provide the data sets, nor explain any changes to the Greenlands mapping since the 2010 version of the plan. There is no accountability or transparency.

Staff state that the proposed draft ROP policies recognize refinements to the Regional Greenlands system *will occur* through subsequent planning approvals (report, page 8). This statement ignores the fact that *not one Secondary Plan has been approved in Richmond Hill and/or along the Yonge Street rapid transit corridor*. In 2010, the ROP called for a number of Secondary Plans to be prepared including for areas identified as Key Development Areas. It is now 2022, what does Regional Planning Staff or Council have to say about this?

Appropriate technical work has not been undertaken by the appropriate public authorities, including the TRCA to support the proposed changes to the ROP.

The location of the Greenlands system remains an issue.

I would like to speak to this matter when it arrives before Regional Council.

Thank you.

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