



ZELINKA PRIAMO LTD

A Professional Planning Practice

VIA EMAIL

March 3, 2020

Mayor and Members of City Council
City of Richmond Hill
225 East Beaver Creek Road
Richmond Hill, ON L4B 3P4

Dear Sirs and Mesdames:

**Re: March 4, 2020 Council Public Meeting
Item 3.3: Staff Report SRPRS.20.036 – Request for Comments –
Zoning By-law Amendment – City of Richmond Hill – City File D24-
19003
Preliminary Comments on Behalf of Loblaw Companies Limited**

Our File: LPL/RCH/14-01

We are the planning consultants for Loblaws Companies Limited ("Loblaw") as it relates to the Richmond Hill Omnibus Zoning By-law Amendment ("ZBA") to introduce commercial schools as a permitted use on certain lands within the City. Loblaw is the lease holder of 301 High Tech Road ("Loblaw lands") in the City of Richmond Hill, which is subject to the proposed ZBA.

This letter is offered to outline our general support for the proposed ZBA, and ask that Council and Staff implement the ZBA in a timely manner.

Background

Loblaw and Zelinka Priamo Ltd. met with City Staff on December 9, 2019 to discuss a proposal by Loblaw to introduce a Commercial School at the existing commercial plaza at 301 High Tech Road. Loblaw requires that Commercial Schools be permitted on the Loblaw lands to allow for a prospective tenant, ICan Education, to occupy a vacant unit within the existing food store.

A Pre-Submission Meeting Response dated January 21, 2020 was provided by Staff following this meeting, wherein Staff noted that a City-initiated Zoning By-law Amendment to introduce Commercial Schools as an additional permitted use within additional commercial zones in the City, will be undertaken in the first quarter of 2020.

Staff Report SRPRS.20.036 ("Staff Report") identifies the Loblaw lands as being subject to the Omnibus ZBA, being located in Area 21 on Map 23.

The Loblaw lands are designated Neighbourhood and are located within an Existing Neighbourhood Commercial Site under the City of Richmond Hill. The Loblaw lands are zoned, in part, Community Commercial (CC) under Zoning By-law 278-96.

Preliminary Comments

Loblaw is supportive of the City initiated Zoning By-law with respect to "Commercial Schools" as outlined in the Staff Report, for the reasons to follow. Loblaw encourages Council to expedite the approval of this ZBA, which is not anticipated to have negative

impact to the community or existing commercial uses, as the prospective tenant is anxious to occupy the vacant space.

As noted by the Staff Report, commercial school uses are only permitted by certain area specific by-laws, and where not contemplated, proposed commercial schools have been addressed on a site-by-site basis through site specific Zoning By-law Amendment applications. Currently, many commercial sites (including the Loblaw lands), would be required to undertake a site specific comprehensive Zoning By-law Amendment to permit a commercial school. This historic process adds additional cost and time for development, in addition to occupying Staff resources, which could otherwise be avoided.

As noted by the Staff Report, commercial schools include uses such as tutoring facilities, or dance and music studios. The existing framework discourages commercial schools from locating within Richmond Hill.

The proposed Omnibus ZBA will help to streamline the planning approvals process with respect to commercial schools, and indicate that the City of Richmond Hill is open for business for this type of development by removing a layer of approvals.

The proposed Omnibus ZBA would be consistent with Provincial policies of the Provincial Policy Statement and Growth Plan which generally encourage that municipalities accommodate a range of uses and support the retail sector for the achievement of complete communities. Specifically, Provincial policy directs as follows:

Provincial Policy Statement

Healthy, liveable and safe communities are sustained by accommodating an appropriate range and mix of employment (including commercial), institutional, recreation, parks and open space, and other uses to meet long-term needs.

Growth Plan for the Greater Golden Horseshoe

Applying the policies of the Growth Plan will support the achievement of complete communities that feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities (Policy 2.2.1.4a).

The retail sector is to be supported by promoting compact built form and intensification of retail and service uses and areas and encouraging the integration of those uses with other land uses to support the achievement of complete communities (Policy 2.2.5.15).

The existing framework, which evaluates commercial schools at a site specific basis through comprehensive Zoning By-law Amendments, is inconsistent with Provincial policy. The existing framework does not accommodate an appropriate range of commercial uses and does not support the retail sector (commercial schools), and the achievement of complete communities is encumbered.

The Omnibus ZBA, however, does appear consistent with Provincial policy as noted above, by ensuring compatible commercial uses are permitted to locate throughout the City at appropriate locations.

We generally concur with the Planning Analysis contained within the Staff Report. Specifically, we agree that Commercial Schools have characteristics that are separate from private schools and religious schools, and which are more in line with commercial uses. Commercial schools generally offer a service commercial type use, wherein a

specific service is provided for gain or profit. Therefore, no negative impact would be anticipated through the introduction of commercial schools in areas where a range of commercial uses are already permitted.

Rather, commercial schools offer natural synergies with other commercial type uses, such as grocery stores, which make their co-location in commercial areas a benefit to the community and other commercial uses. For instance, commercial schools are a destination that one travels to, to either attend or drop someone off. This naturally allows individuals to get daily (grocery) shopping accomplished in the same location and at the same time as attending the commercial school.

We thank you for the opportunity to provide the above information on behalf of Loblaw and look forward to Council's consideration of the Omnibus ZBA in a timely fashion. Should you have any questions, or require further information, please do not hesitate to call.

Yours very truly,

ZELINKA PRIAMO LTD.



Rob MacFarlane, MPL
Planner

cc. Loblaw Companies Limited (via email)