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June 20, 2025

The Corporation of the City of Richmond Hill  
Planning and Infrastructure Department  
225 East Beaver Creek Road  
Richmond Hill, Ontario  
L4B 3P4

Attn: Mr. Salvatore Aiello, Manager, Development Zoning

Dear Mr. Aiello:

**Re: Response to Draft Comprehensive Zoning By-law 30-25 Amendment  
Report SRPBS.25.070 (City File: MZBA-23-0001)  
13572 and 13586 Bayview Avenue  
2747883 Ontario Inc. and 2753502 Ontario Inc.**

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Goldberg Group acts on behalf of 2747883 Ontario Inc. and 2753502 Ontario Inc., collectively the "**Owner**" of the properties described 'Part of Lot 1, Registered Plan 200', and municipally known as 13572 and 13586 Bayview Avenue (the "**subject property**"). The subject property is located on the west side of Bayview Avenue, approximately 95 meters north of Snively Avenue.

The subject property has previously been subject to applications of amend the City of Richmond Hill Official Plan and Zoning By-law to permit the redevelopment of the subject property with an 8-storey apartment building (City Files: D01-20003 and D02-20009). At its meeting of July 6, 2022, City of Richmond Hill Council accepted the recommendations of Staff to adopt Amendment No. 36 to the City of Richmond Hill Official Plan (OPA 36), and to re-zone the lands to the *Multiple Residential One (RM1)* Zone with site specific development standards. A Site Plan Control application (SPA) was also submitted to the City, and deemed complete as of July 29, 2022 as City File D06-22047.

A further application to amend the Official Plan has recently been provided to the City, and was deemed complete as of January 13, 2025 as City File OPA-24-0009.

As of the date of this letter, the amending Zoning By-law has been approved in principle, however is not yet in force and effect as the implementing instrument is to be brought forward for enactment by Council upon the resolution of the remaining technical matters related to the SPA.

Additionally, our Client is an Appellant of the 'Centres and Corridors' portion of the Comprehensive Zoning By-law (the "**CZBL**"), previously adopted by City Council.

We have reviewed the draft amendments to the CZBL appended to Staff Report SRPBS.25.070 and maintain our comments related to the General Provisions of **Section 3.0** provided in previous correspondence related to the 'Centres and Corridors' portion of the

CZBL. We also note that the subject property is proposed to be placed within the *Neighbourhood Mixed Use (NMU)* Zone within the CZBL.

Considering the status of the ongoing Planning Applications related to the subject property, we believe it is premature for the City to identify a Zone classification for the lands. Accordingly, we ask that Schedule 'A' to the CZBL be revised to remove any identification of the lands.

We also request that the future instrument to implement the Zoning By-law Amendment respecting the above noted application be included as a site-specific exception within **Section 19.0** of the CZBL such that it is not necessary to rely on the Transition Regulations of **Section 1.12**. In any event, we also suggest that the Transition Regulations are inadequate in their current form, and should not expire upon issuance of building permits or 3 years following the enactment of the CZBL.

We welcome the opportunity to meet with City Staff to discuss the above comments and concerns, and request to be notified of any further activity or reporting on this matter.

If you have any questions or require additional information, please do not hesitate to contact the undersigned at ext. 2101.

Yours truly,

**GOLDBERG GROUP**



Adam Layton, MCIP, RPP

cc. 2747883 Ontario Inc.  
2753502 Ontario Inc.