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June 19, 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.25.090 (City File: MZBA-23-0001)
295 King Road
King South-East Developments 295 Inc.**

Goldberg Group acts on behalf of King South-East Developments 295 Inc., the 'Owner' of the lands legally described as 'Lot 3, Plan M38', and municipally known as 295 King Road (the 'subject property'). The subject property is located on the south side of King Road, east of Bond Crescent.

A previous application to amend the City of Richmond Hill Zoning By-law to allow the redevelopment of the subject property with 15 townhouse dwellings of common element condominium tenure was approved on July 5, 2023 as City File No. D02-21013. Implementing By-law 75-23 (the "ZBLA") was approved by City Council on July 12, 2023 and is now in full force and effect.

To implement the land use permitted through this By-law, it was necessary to also obtain approval of applications for Site Plan Control (SPA), and Draft Plan of Condominium (Common Element) (DPOC). These applications were submitted to the City and deemed complete as City Files: SP-24-0028 and CON-24-0009 as of October 24, 2024, and remain under review.

On behalf of our Client, we have previously provided comments with respect to the 'Centres and Corridors' portions of the Comprehensive Zoning By-law 30-25 (the "CZBL") prior to adoption by Council on March 11 and March 14, 2025.

Additionally, our Client is an Appellant of the CZBL. Therefore, without prejudice to the ongoing appeal, we provide the following comments on behalf of our Client.

We have reviewed the draft amendments to the CZBL appended to Staff Report SRPBS.25.070 and note that the site specific provisions of the ZBLA have not been included

in Section 19.0 Exceptions. Rather, the subject property is proposed to be classified within the *Neighbourhood Semi Detached Two (NS2) Zone*.

The NS2 Zone is an inappropriate classification of the subject site as it does not permit the Townhouse Dwellings implemented through the ZBLA. Accordingly, we insist that Schedule 'A' be revised to reflect an appropriate Zone Category to permit the intended uses approved by City Council.

Further, while we appreciate that the Transition Regulations of Section 1.12 would apply, we note that **Regulation 1.12.8** would not transition the provisions of the ZBLA beyond building permit issuance, and that the Transition Regulations as a whole cease to be in force and effect 3 years after the CZBL is passed by the City.

This potentially creates situations in which the zoning for the site determined through a completed site-specific process is simply no longer recognized and relief may be required despite compliance with those approvals. For example, if the further approvals take longer than anticipated, the proposed development could fall out of compliance with its current zoning approvals. Additionally, future Owners of the units within the proposed development may be restricted from otherwise ordinary alterations to their dwellings and need to seek significant relief from the provisions of the CZBL.

On this basis, we ask that the ZBLA be included as a site-specific exception within **Section 19.0** of the CZBL. We also request that this exception be assessed against the proposed general regulations of the CZBL, with any additional relief incorporated into same to ensure that the proposed development remains fully compliant with the proposed regulations such that it is not necessary to rely on the Transition Regulations of **Section 1.12**.

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. King South-East Developments 295 Inc.