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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 Amendment
Report SRPBS.25.090 (City File: MZBA-23-0001)
30 Beech Avenue, 211, 223, 235, 251, 273, 291, and 305 Jefferson
Sideroad, and 196, 21, 234, 246, 260, 278, 288, and 307 Harris Avenue
Country Wide Homes (Jefferson) Inc. and Giuseppina Brunetto**

Goldberg Group acts on behalf of Country Wide (Jefferson) Inc., and Giuseppina Brunetto, collectively the **“Owner”** of lands legally described as ‘Lots 1, 3, 4, and 5, Registered Plan 9597; Lots 11, 15, 16, 17, 18, 20, 21, 22, 23, 24, 27, and 28, Registered Plan 1916, Part 1 on Plan 65R-37933, Lot 2, Registered Plan 9597, Part 1 on Plan 65R-38488’, and ‘Lot 3, Plan 65M-2071’, and municipally described as 30 Beech Avenue, 211, 223, 235, 251, 273, 291 and 305 Jefferson Sideroad, and 196, 210, 226, 234, 246, 260, 278, 288, and 307 Harris Avenue (the **“subject property”**). The subject property is an assembly of a number of properties generally located south of Jefferson Sideroad east of Beech Avenue, and west of Settlement Crescent, and is referred to as **“Jefferson South”**.

The City of Richmond Hill previously issued decisions for Plan of Subdivision Application 19T(R)-16002 on April 6, 2018, and Applications 19T(R)-14008 and 19T(R)-16002 on July 7, 2021. Plan 65M-4845 was registered on April 9th 2025, and had the effect of creating:

- 3 new local streets (James Pollard Drive, Moose Avenue, Flower Court)
- Blocks to effect the widening of Beech Avenue
- Residential lots to accommodate 117 single detached dwellings, 12 semi-detached dwellings and 35 street townhouse dwellings,
- A stormwater management block
- 2 blocks for pedestrian walkway
- 6 blocks for 0.3 metre reserves

The corresponding Zoning framework for the subject property was established through a series of Zoning Amendments (collectively, the **“ZBLA”**) as implemented through the following instruments:

- By-law 36-18, passed April 16, 2018;
- By-law 37-18, passed April 16, 2018; and
- By-law 88-21, passed July 7, 2021.

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 13, 2025. Additionally, the Owner is an Appellant of the CZBL. Therefore, without prejudice to the ongoing appeal, we provide the following comments on behalf of our Client.

Our Client has now serviced the lands and constructed a sales centre, and is in the midst of their sales and marketing process. Accordingly, it is essential that the CZBL provide certainty that the built form options previously reviewed and approved by Council continue to be permissible without requiring further relief.

We have reviewed the draft amendments to the CZBL appended to Staff Report SRPBS.25.070 and note that the subject property has been placed within *the Neighbourhood One (N1), Neighbourhood Four (N4), and Neighbourhood Townhouse Two (NT2) Zones*.

These Zones do not appear to reflect permission for the Semi-Detached Dwelling units approved along Beech Avenue, being Lots 1 through 6 on Plan 65M-4845. Similarly, the site specific provisions implemented through the ZBLA do not appear to be accurately reflected through the generic Zones within the CZBL, and in particular minimum lot frontage and minimum lot area for many now registered lots.

On this basis, we insist that the CZBL be revised to include the ZBLA regulations as site-specific Exceptions within **Section 19.0** of the CZBL. Additionally, we request that any Exceptions include any additional relief as may be required from the General Provisions of **Section 3.0** of the CZBL given that the ZBLA were approved without the benefit of being able to consider these regulations. We feel that given the effort undertaken thus far to advance the Jefferson South project, it is incumbent to remove the need to rely on the Transition Regulations of **Section 1.12**.

Additionally, we feel that the Transition Regulations are inadequate in any event, as they expire upon issuance of building permits or 3 years following the enactment of the by-law.

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. Country Wide Homes (Jefferson) Inc.
Giuseppina Brunetto