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July 31, 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)  
48, 50, and 52 Arnold Crescent  
Laurier Homes (Richmond Hill) Inc.**

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Goldberg Group acts on behalf of Laurier Homes (Richmond Hill) Inc., the “**Owner**” of the properties legally described as ‘Lots 1, 2, and 3, 65M-4746’, and municipally known as 48, 20, and 52 Arnold Crescent (collectively, the “**subject property**”). The subject property is located on the south side of Arnold Crescent, east of Elizabeth Street South, and approximately 184 metres west of Yonge Street.

The redevelopment of the subject property has previously been subject to an appeal at the Local Planning Appeal Tribunal (now the OLT) as Case PL160105. In a decision issued July 12, 2018, the Tribunal allowed appeals to permit the redevelopment of the subject property with three detached dwellings and 88 stacked townhouse dwellings. The decision also allowed the extension of Elizabeth Street south of Arnold Crescent.

Since the issuance of the above noted decision, City Council has approved implementing Zoning By-law Amendment 69-20 on July 8, 2020. Further Plan 65M-4746 was registered on August 17, 2022, creating the lots comprising the subject property.

Within Comprehensive Zoning By-law 30-25 (the “**CZBL**”) the subject property is identified within the *Local Centre-Village (LC-V) Zone*, which permits a variety of dwelling types, including detached and semi-detached dwellings for lands without frontage along Yonge Street or Major Mackenzie Drive.

We have reviewed the proposed amendments to the CZBL which seeks to introduce development standards related to detached and semi-detached dwellings. In particular, we note that **Special Provision 18** to **Table 4.1D** outlines that semi-detached dwellings are to be governed by the provisions for the *Neighbourhood Semi-Detached One (NS1) Zone*.

Our Client is generally supportive of the permitted uses, however suggest that greater flexibility is required with respect to the applicable development standards. To aid in demonstrating the ability to accommodate semi-detached dwellings on the subject property,

with minor lot line adjustments, a conceptual site plan and building cross section has been prepared and appended to this letter.

Our comments on behalf of our Client is as follows:

### **Section 3.4: Permitted Encroachments**

#### **Section 3.14: Regulations for Decks and Porches**

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We note that **Regulation 3.4(d)** provides that stairs used to access a deck or porch can encroach to a point not less than 0.3m from a lot line, but refers to 'the above provisions'. The preceding sections of Regulation 3.4 do not contain direction with respect to porches or decks, which are instead contained in **Regulation 3.14**.

We suggest that greater clarity is required to ensure that there are no mistakes in interpretation of these provisions.

### **Section 3.6: Landscaping**

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We request clarification as to whether the area of a 'porch' can be included in the calculation of soft landscaping for the purposes of **Regulation 3.6 (b)(i)**. The Regulation provides that *"...the area of the lot covered by the detached accessory structures or **porches** shall be included in the calculation of the minimum **landscaping**" [emphasis added]*. While porches are a permitted encroachment as outlined in **Regulation 3.14**, there is no definition for the term **landscaping** provided in the CZBL which distinguishes whether this area is **hard** or **soft landscaping**.

As shown on the appended plans, this distinction is a significant consideration with respect to the ability to satisfy the required 45% soft landscaping area within the proposed front yards. We also suggest that the requirement should be reduced to 35% as it is clearly demonstrated that a 'regular' building siting configuration still results in difficulty achieving a 45% soft landscaped area, even on lots with buildings that otherwise are able to satisfy the provisions of the CZBL (i.e. larger frontage, greater yard setbacks, and lesser coverage than that required in the CZBL).

### **Section 3.9.1: Home Occupations**

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We question the rationale behind several of the development standards related to Home Occupations outlined in Subsection (1), including the following:

- **Subsection (g):** Why can veterinary services not operate out of a dwelling if it can be demonstrated that appropriate noise control measures have been implemented to avoid impact on adjacent lands?
- **Subsection (i):** We suggest this requirement requires greater clarification as to what is considered a "typical" vehicle employed in residential deliveries? We understand that the intent of this provision is likely to avoid large trucks entering into residential areas, however suggest that this may be out of the control of an operator of a home business.
- **Subsection (j):** We question why a home business could not operation with a small number of employees (i.e. 1 or 2)?
- **Subsection (k):** We question the rationale behind the limit of only 4 students or patrons at one time.

**Table 5.2A: Neighbourhood Standards**

The NS1 Zone standards provided in this table are as follows:

<b>Min. Lot Frontage</b>	12 m
<b>Min. Lot Area</b>	430 m <sup>2</sup>
<b>Max. Lot Coverage</b>	50%
<b>Min. Front Yard Setback</b>	3.5 m
<b>Min. Side Yard Setback</b>	1.2 m
<b>Min. Flankage Yard Setback</b>	2.4 m
<b>Min. Rear Yard Setback</b>	6 m
<b>Max. Height</b>	11 m

We suggest that the minimum lot area required within the NS1 Zone be reduced within the LC-V Zone. Given the minimum lot frontage of 12 m, the required lot depth would need to be +/-35.83 m to achieve an area of 430 m<sup>2</sup>. It is our experience that this greatly exceeds the typical lot depths achieved through modern development practices.

Based on the conceptual site plan, proposed Lot 2 would only achieve a lot area of approximately 373 m<sup>2</sup>, despite providing a lot frontage which greatly exceeds the minimum required within the NS1 Zone, and supporting a dwelling which is otherwise being able to otherwise comply with the CZBL. On this basis, we suggest that it is necessary to reduce the lot area requirement to promote this form of 'soft' intensification within the LC-V Zone while avoiding the need for costly and time consuming Minor Variance Applications.

Further, as shown on the attached conceptual cross section, while the proposed dwellings are potentially able to satisfy the height requirements, there is little room for flexibility based on grading conditions and current market desires for internal living arrangements. In this regard, we suggest that consideration should be given to increasing the maximum height to 12 metres.

**Conclusion**

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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. Laurier Homes (Richmond Hill) Inc.

**APPENDIX 1  
CONCEPTUAL DEVELOPMENT PLANS**

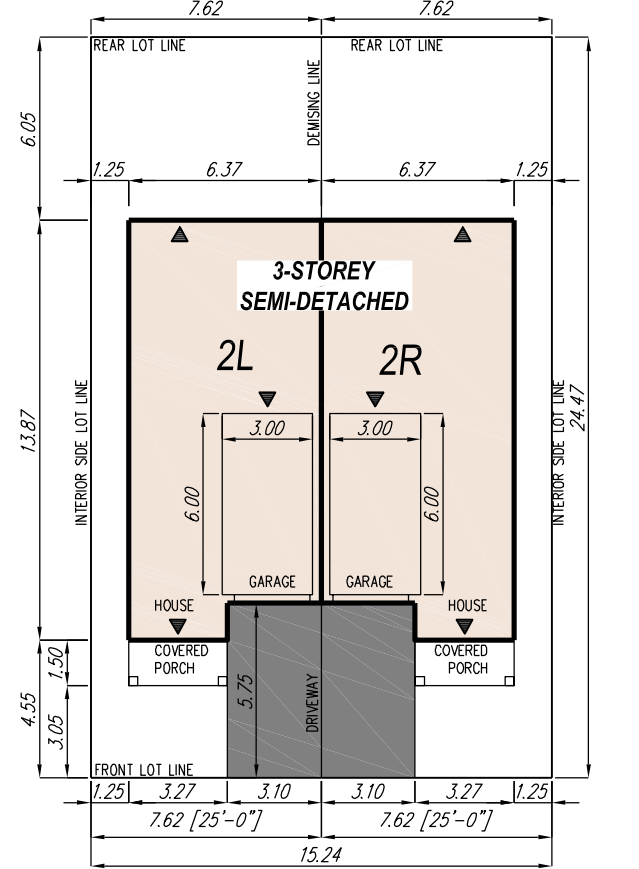
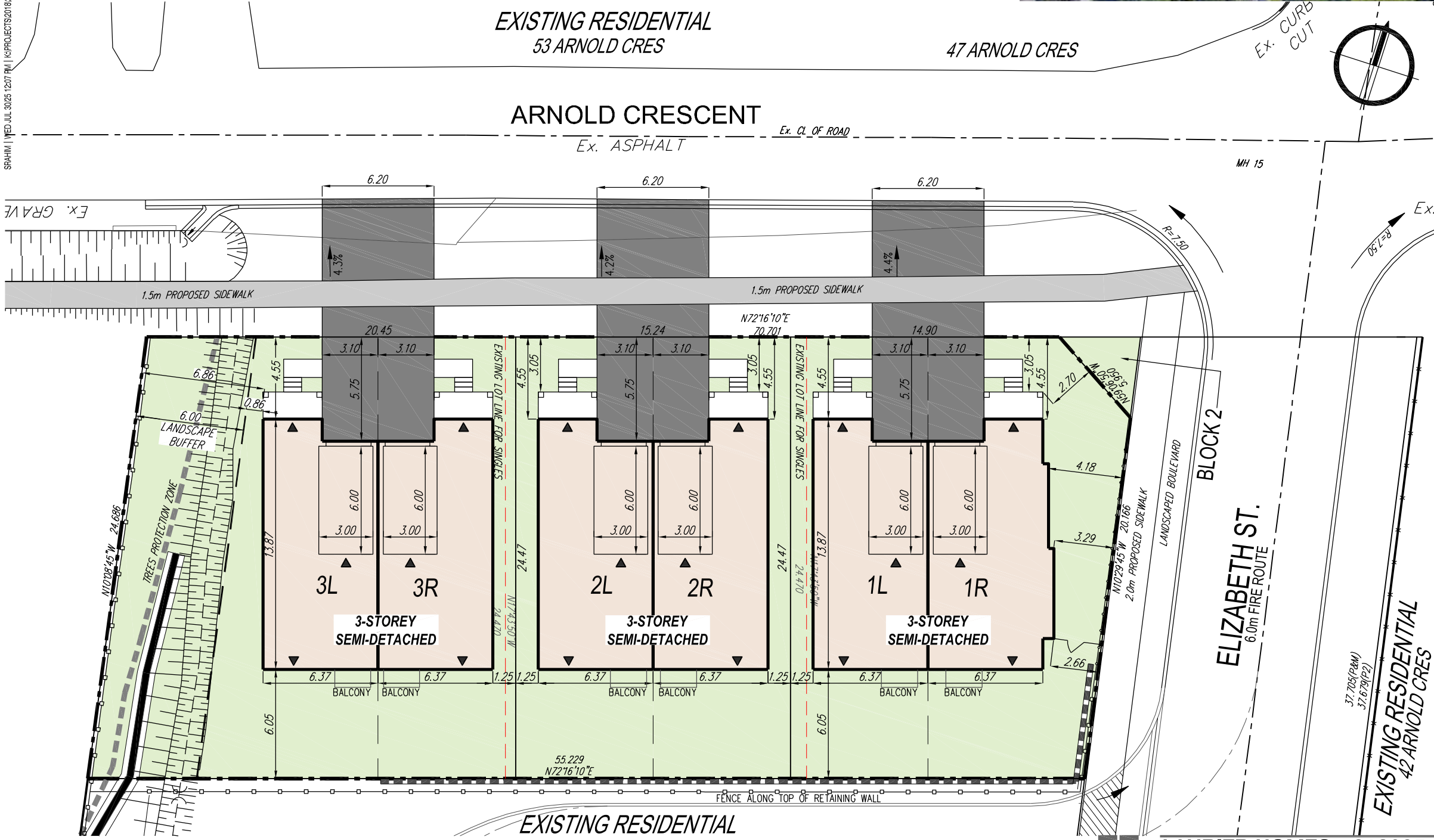
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**SITE STATS**  
**ARNOLD CRESCENT, RICHMOND HILL, ONT.**

PARENT BY-LAW	BY-LAW 30-25 COMPREHENSIVE ZONING BY-LAW			
PROPOSED ZONE	NS1 - NEIGHBOURHOOD STANDARDS			
ZONING CHART:				
	REQUIRED	PROPOSED 1L/R	PROPOSED 2L/R	PROPOSED 3L/R
MIN. LOT FRONTAGE	12m	14.90m	15.24m	20.45m
MIN. LOT AREA	430 sm	* 426.61 sm	* 372.92 sm	540 sm
MAX. LOT COVERAGE PORCH + DECK + BALCONY NOT INCLUDED IN CALCULATION	50%	41%	46%	32%
MINIMUM FRONT YARD	3.5m EXCEPT THAT A GARAGE MUST BE SET BACK 5.7M	4.5m	4.5m	4.5m
MINIMUM REAR YARD	6.0m	6.0m	6.0m	6.0m
MINIMUM INTERIOR SIDE YARD	1.2m	1.2m // 2.6m	1.2m // 1.2m	6.8m // 1.2m
MINIMUM EXTERIOR SIDE YARD	2.4m	2.60m	N/A	N/A
MAXIMUM BUILDING HEIGHT	11.0m	TBD	TBD	TBD
MIN. PARKING SPACES	2.7m x 5.7m 3.0m x 5.7m IF OBSTRUCTION	3.0m x 5.7m	3.0m x 5.7m	3.0m x 5.7m
NO. OF PARKING SPACES	PSA 3 MIN/MAX = 1/0	2	2	2
3.6.B - SOFT LANDSCAPING	45% OF FRONT YARD	* 42.88%	* 36.66%	53.48%
3.6.B - SOFT LANDSCAPING	45% OF FRONT YARD INCLUDES PORCHES	49.25%	43.7%	58.6%
3.6.B - SOFT LANDSCAPING	45% OF FLANKAGE YARD	100%	N/A	N/A

\* MINOR VARIANCE REQUIRED  
**BUILDING HEIGHT**  
 BUILDING OR STRUCTURE HEIGHT OF LESS THAN 5 STOREYS MEANS WITH REFERENCE TO A

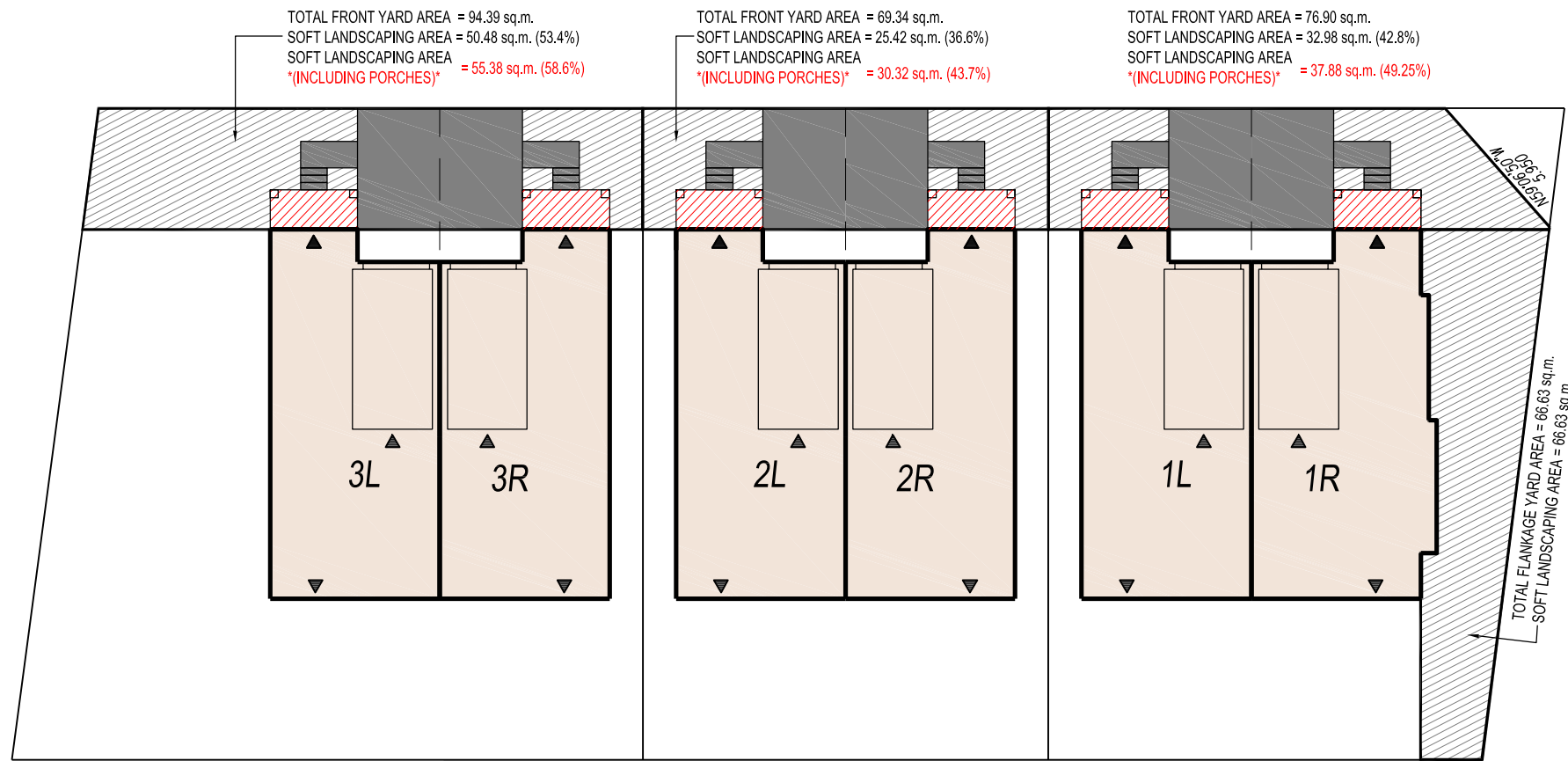


**7.62m (25') SEMI-DETACHED**  
**LOT TYPOLOGY @ 24.47m DEEP**  
 LOT SIZE = 15.24m X 24.47m  
 LOT SIZE (SEPARATE L/R) = 7.62m X 24.47m  
 LOT AREA (SEPARATE L/R) = 186.46 sm  
 LOT AREA (TOTAL) = 372.92 sm  
 LOT COVERAGE = 45.3%  
 GROSS FLOOR AREA  
 GROUND FLOOR = 689.07 SF  
 MAIN FLOOR = 910.30 SF  
 THIRD FLOOR = 910.30 SF  
 TOTAL = 2509.67 SF

CONCEPTUAL SITE PLAN - SCHEME A SCALE: 1:250



**LAURIER HOMES - 218095**  
 HIGH POINT, RICHMOND HILL, ONTARIO  
 8966 Woodbine Ave, Markham, ON L3R 0J7 | T 905.737.5133



**LEGEND**  
 - FRONT + FLANKAGE YARD AREA BOUNDARY  
 - HARD LANDSCAPING  
 - SOFT LANDSCAPING

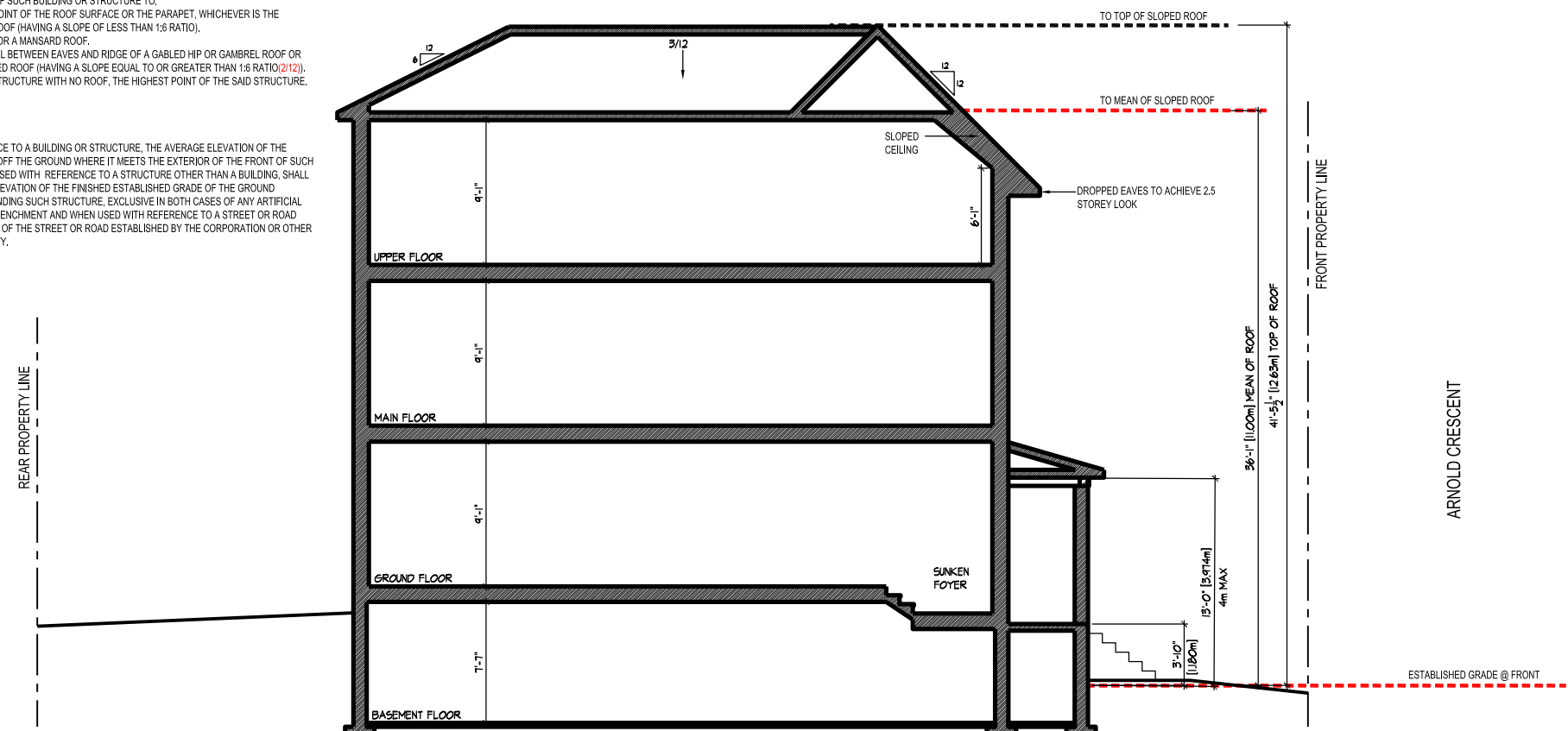
**NOTE:**  
 NEED CONFIRMATION FROM ZONING DEPARTMENT IF COVERED PORCHES CAN BE INCLUDED IN THE CALCULATION OF "SOFT" LANDSCAPING



**FIGURE 1 - SOFT LANDSCAPING CALCULATION**  
 SCALE: 1:250

**BUILDING HEIGHT**  
 BUILDING OR STRUCTURE HEIGHT OF LESS THAN 5 STOREYS  
 MEANS WITH REFERENCE TO A BUILDING OR STRUCTURE, THE VERTICAL DISTANCE MEASURED ROOM THE ESTABLISHED GRADE OF SUCH BUILDING OR STRUCTURE TO:  
 a) THE HIGHEST POINT OF THE ROOF SURFACE OR THE PARAPET, WHICHEVER IS THE GREATER, OF A FLAT ROOF (HAVING A SLOPE OF LESS THAN 1:6 RATIO).  
 b) THE DECKLINE OR A MANSARD ROOF.  
 c) THE MEAN LEVEL BETWEEN EAVES AND RIDGE OF A GABLED HIP OR GAMBREL ROOF OR OTHER TYPE OF PITCHED ROOF (HAVING A SLOPE EQUAL TO OR GREATER THAN 1:5 RATIO) (2/12).  
 d) IN CASE OR A STRUCTURE WITH NO ROOF, THE HIGHEST POINT OF THE SAID STRUCTURE.

**ESTABLISHED GRADE**  
 MEANS WITH REFERENCE TO A BUILDING OR STRUCTURE, THE AVERAGE ELEVATION OF THE FINISHED STRUCTURE OFF THE GROUND WHERE IT MEETS THE EXTERIOR OF THE FRONT OF SUCH BUILDING AND, WHEN USED WITH REFERENCE TO A STRUCTURE OTHER THAN A BUILDING, SHALL MEAN THE AVERAGE ELEVATION OF THE FINISHED ESTABLISHED GRADE OF THE GROUND IMMEDIATELY SURROUNDING SUCH STRUCTURE, EXCLUSIVE IN BOTH CASES OF ANY ARTIFICIAL EMBANKMENT OR ENTRENCHMENT AND WHEN USED WITH REFERENCE TO A STREET OR ROAD MEANS THE ELEVATION OF THE STREET OR ROAD ESTABLISHED BY THE CORPORATION OR OTHER DESIGNATED AUTHORITY.



**FIGURE 2 - CONCEPTUAL CROSS SECTION**  
 SCALE: NTS

(ORIGINAL LOT 3 SINGLE DETACHED GRADING)