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October 16, 2025

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

Attn: Councilor Castor Liu, Chair-Committee of Whole, City of Richmond Hill

Dear, Councilor Liu:

**Re: Proposed East Beaver Creek Secondary Plan
100-140 and 115 York Boulevard - City of Richmond Hill
Crestpoint Real Estate (YCC) Inc.**

We are the land use planners, acting on behalf of Crestpoint Real Estate (YCC) Inc., the Owner of the property municipally known as 100-140 and 115 York Boulevard, Richmond Hill (the subject property).

On behalf of the Owner, we have been actively involved in the public consultation process for the East Beaver Creek Secondary Plan (the EBC Secondary Plan). We have attended the consultation meeting for the public and the landowners, conducted on September 5, 2025, and have provided written comment letter to the planning staff on September 26, 2025.

The written comment letter provided our land use planning rationale supporting the designation of the East Beaver Creek Secondary Plan Area as a Key Development Area as opposed to a Local Centre, outlined in the Growth Management Policies within the City of Richmond Hill Official Plan (**Attachment A**). Our letter described the opportunity to develop the EBC Secondary Plan area to its appropriate potential and leverage factors such as proximity to major transportation corridors, available servicing infrastructure, existing mixed-use community and opportunities for infill development. Additionally, the KDA designation of the EBC Secondary Plan area will contribute to advancing provincial and local goals, objectives and policies of creating complete communities and its housing target.

In advance of the Committee of Whole, the planning staff had provided the following for the Committee's consideration:

- Background Report and draft land use options respecting the East Beaver Creek (EBC) Secondary Plan area.
- Attachment 1 – East Beaver Creek Secondary Plan Background Report dated September 2025

- Attachment 2 - East Beaver Creek Secondary Plan: Phases 1 and 2 Engagement Summary dated September 2025

The Background Report and draft land use options did not consider important factors that would support the development of the EBC Secondary Plan area as a KDA and continues to identify it as a Local Centre. In our respectful opinion, the report fails to even consider this potential planning outcome.

It notes that:

“In order to ensure balanced growth throughout the City Structure, EBC should not absorb a significant share of the City’s overall projected housing growth.”

This, in our opinion, is a missed opportunity and is inconsistent with the provincial and local goals to create complete communities and to optimize the available land and infrastructure.

Additionally, the East Beaver Creek Secondary Plan: Phases 1 and 2 Engagement Summary only briefly mention comments made by the major landowners in support of the designating the EBC Secondary Plan area as a KDA and fails to include the communication that we provided for your consideration.

We request you consider this letter and the comment letter filed with staff on September 26, 2025. We additionally request that you direct staff to prepare updated reports, analyzing the requests made by the landowners. Failing to do so, leads us to the conclusion that the study recommendations do not represent good planning, and are not in the public interest. In that event, our client objects to the ongoing direction of the study.

We look forward to our ongoing consultation concerning this study. If you have any questions or require additional information, please do not hesitate to contact the undersigned at ext. 2101 or Todd Trudelle at ttrudelle@goldberggroup.ca .

Yours truly,
GOLDBERG GROUP



Michael S. Goldberg, MCIP, RPP
Principal

Cc: Crestpoint Real Estate (YCC) Inc.

ATTACHMENT A



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September 26, 2025

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

Attn: Ms. Phoebe Chow, Manager, Policy Planning

Dear Ms. Chow:

**Re: Proposed East Beaver Creek Secondary Plan
100-140 and 115 York Boulevard - City of Richmond Hill
Crestpoint Real Estate Investments Ltd.**

We are the land use planners, acting on behalf of Crestpoint Real Estate Investments Ltd., the Owner of the property municipally known as 100-140 and 115 York Boulevard, Richmond Hill (the subject property).

On behalf of the Owner, we have been actively involved in the public consultation process for the East Beaver Creek Secondary Plan (the EBC Secondary Plan) and recently attended a consultation meeting for the public and the landowners, conducted on September 5, 2025. It is our understanding that the secondary plan study process is currently in the Phase 2 – Policy Directions stage, aimed at developing the EBC Secondary Plan. As we understand it, the City’s study currently envisions the development of the EBC Secondary Plan area as a Mixed-use Local Center and the current City plan is to redesignate this area as a Local Centre in the City of Richmond Hill Official Plan (City OP).

During the consultation meeting, 3 density options for the EBC Secondary Plan were presented for consideration. We and other landowner representatives requested at the meeting that the City consider redesignating the EBC Secondary Plan area as a Key Development Area (KDA) within the Official Plan.

The City OP defines Key Development Areas as

“intensification areas located along the Regional Corridors where public rapid transit services intersect with major nodes of retail and commercial development, and where opportunities exist for redevelopment of large land parcels that can support new public streets.”

In our opinion, the EBC Secondary Plan area should be considered as a Key Development Area for the following reasons:

- The area has strong regional connectivity, attributed to its proximity to the intersection of two major transportation corridors: Highway 404, which serves as an important primary north-south Provincial highway, and Highway 7, which functions as an important east-west arterial road.
- The area is well serviced by multiple public transit routes including higher order transit, in the form of the bus rapid transit (BRT) traveling along Highway 7 and multiple York Region Transit routes. Additionally, a future rapid transit route is planned to service the Leslie Street corridor.
- The EBC Secondary Plan area supports a variety of land uses including but not limited to nearby high-rise residential, retail spaces, commercial establishments, office and light industrial. This mix of uses together with augmented mixed use development contributes to creating a complete community.
- Opportunities for intensification and development exist in form of large, under-utilized surface lots, such as the ones existing on our client's sites. The redevelopment of these under-utilized sites and the addition of more intense forms of development such as that directed and expected within KDAs, would support a more optimal use of land and available infrastructure. It also would better support active transportation and aid it in achieving the goal to create a complete community.
- It is very important to optimize the use of land and available existing and planned infrastructure. Failing to do so could well lead to an under-utilization of this well serviced area and would be a lost opportunity. Importantly, failing to optimize this area would not be consistent or conform to, with many Provincial and Regional policy objectives for an area such as the EBC Secondary Plan Study area.
- The subject site and surrounding area form part of the approved Protected Major Transit Station Area, East Beaver Creek BRT Station. As such, this area is a Strategic Growth Area according to the Provincial Policy Statement (PPS). -The PPS directs lands within such areas to be subject to municipal land use policies directing intense forms of mixed use development. In our opinion, designating the lands as a Local Centre would undermine its ability to optimally redevelopment and would therefore not be consistent with the PPS.

The designation of this area as a KDA as opposed to a Local Center within the OP structure will recognize and optimize this unique location and opportunity for the long-term. The goal of this study is to look and project into the long-term future of this area. This is an important opportunity to make better use of the significant public investment and expenditure in existing and planned higher order transit. We suggest and request that this should form part of the planning analysis of this study, particularly since so few corridors in Richmond Hill and York Region are serviced by higher order public transit.

We look forward to our ongoing consultation concerning this study. If you have any questions or require additional information, please do not hesitate to contact the undersigned at ext. 2101 or Todd Trudelle at ttrudelle@goldberggroup.ca .

Yours truly,
GOLDBERG GROUP



Michael S. Goldberg, MCIP, RPP
Principal

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