

November 14, 2022



Greenbelt Site Specific Review
Ministry of Municipal Affairs and Housing
Central Municipal Services Office
777 Bay Street, 13th floor
Toronto, ON M5G 2E5

Submitted via email only to: greenbeltconsultation@ontario.ca

RE: Proposed Amendments to the Greenbelt Plan - Proposed Greenbelt Area boundary regulation (O. Reg. 59/05), and Oak Ridges Moraine Conservation Plan (O. Reg. 140/02); – Consultation Comments from Times Group Corporation Re 11280 & 11430 Leslie Street, 19th & Bayview Avenue in the City of Richmond Hill;

We are submitting this letter as our submission to the Ministry of Municipal Affairs and Housing (the "**Ministry**") November 4, 2022, request for comments with respect to Proposed Greenbelt Area boundary regulation (O. Reg. 59/05), and Oak Ridges Moraine Conservation Plan (O. Reg. 140/02) (collectively the "**Nov 4 Regulations**").

Executive Summary

Please accept this letter as a proposal to re-designate certain lands in Richmond Hill into and out of the Greenbelt. The proposal aligns carefully with the requirements set out in the Nov 4 Regulations namely that:

- Greater than 1:1 offset must be achieved to ensure overall Greenbelt expansion
- The lands are adjacent to existing settlement areas
- The lands are adjacent to the edge of the Greenbelt area boundary
- The lands have the potential ability to be serviced in the near-term with local infrastructure upgrades to be entirely funded by proponents
- The lands proposed for removal have the characteristics that would enable housing to be built in the near-term.

In addition to complying with the above criteria, the proposal also delivers:

1. **2:1 Offset- 7.15 Net New Hectares of Greenbelt.** The proposal will remove 7.46 hectares from the Greenbelt and bring 14.61 hectares of settlement area in the Oak Ridges Moraine (ORM) with transitional development rights grandfathered under the ORM Conservation Plan within the enhanced protection governed by the Greenbelt Plan Policies, resulting in a net increase of 7.15 hectares of Greenbelt lands (2:1 offset).

2. **127 New Homes, 20 New Affordable Townhomes in Richmond Hill.** The net impact of the boundary adjustment on the site plan resulted in an additional supply of approximately 1082 meters of additional lot frontage. Based on our housing mix of 6m wide townhomes and 11m wide single-family lots, the total increase is 127 housing units (63 townhouses and 64 single family units).
3. **Adjacent to Settlement Areas with Servicing Already Underway.** The North Leslie community has been in development since the 1980's and the lands have secured draft plan approval. Servicing of the lands is already underway, and the construction of the potential net new 127 homes is possible in the short term. Incorporating these lands into the adjacent settlement area will allow for more efficient use of new servicing and infrastructure investment.
4. **No Sensitive Environmental Features or Viable Agricultural Lands to be removed from Greenbelt.** The lands to be redesignated/removed from the Greenbelt do not contain natural heritage features, wetlands, woodlands, significant wildlife habitats for species at risk and are situated beyond the 30m vegetation protection zone/buffers. They have historically been planted with soya bean or corn, uses which will no longer be viable once the settlement areas are established because of their small and irregular sizes, lack of road access and proximity to new homes.
5. **Proposed Lands to be Added to Greenbelt include Sensitive Environmental Features requiring protection.** The proposed 14.61 hectares of lands proposed to be included into the Greenbelt is situate adjacent to the Holy Trinity School and includes provincially significant wetlands, woodlands, tributary areas and associated riparian vegetation. These lands are designated as Settlement Areas under the Oak Ridges Moraine Plan and were subject to a development application prior to Times Group acquiring the lands in 2015.
6. **Consulting and Engineering Studies to Support Proposal.** The proposal has been widely studied and contains reports from environmental consultants, engineering firms, and professional planners. These studies and reports confirm that proposed adjustment is in accordance with all stated provincial objectives identified in both the existing and Nov 4 Regulations.
7. **Unanimous Council Approval for Proposal.** The proposal was created in concert with staff at the City of Richmond Hill and received a positive staff report and City of Richmond Hill Council approval when the staff report was presented.

Background & Subject Lands

Times Group affiliates Times 1128 Inc., 1863106 Ontario Inc. and 1863099 Ontario Inc. currently own three parcels of land in the Town of Richmond Hill:

- Part of the East Half of Lot 29, Concession 2; Town of Richmond Hill (11280 Leslie Street, Town of Richmond Hill) ("**11280 Leslie**");
- Part Lot 30 Concession 2; Town of Richmond Hill (11430 Leslie Street, Town of Richmond Hill) ("**11430 Leslie**"); and
- Bayview and 19th Area Lands (PCL 54-1; Sec MA1/PT LTS 54 & 55, CON 1 EAST of Yonge St; Part 4, 5, 6, 65R13739; S/T MA42088; S/T MA42088) (the "**Nischal Lands**" and together with 11280 Leslie and 11430 Leslie, the "**Times North Leslie Lands**")

The Times North Leslie Lands are approximately 57 hectares in area, located just south of the Oak Ridges Moraine and include approximately 20 hectares of Greenbelt protected areas. 11280 and 11430 Leslie Street are low-rise developments in the North Leslie Secondary Plan of Richmond Hill. Times Group has owned these properties for decades and has been actively developing the project since 1988. The boundaries of 11280 and 11430 Leslie include the areas of the Greenbelt that Times Group proposes to redesignate as settlement area. An illustration of developments in the vicinity of these developments follows below.

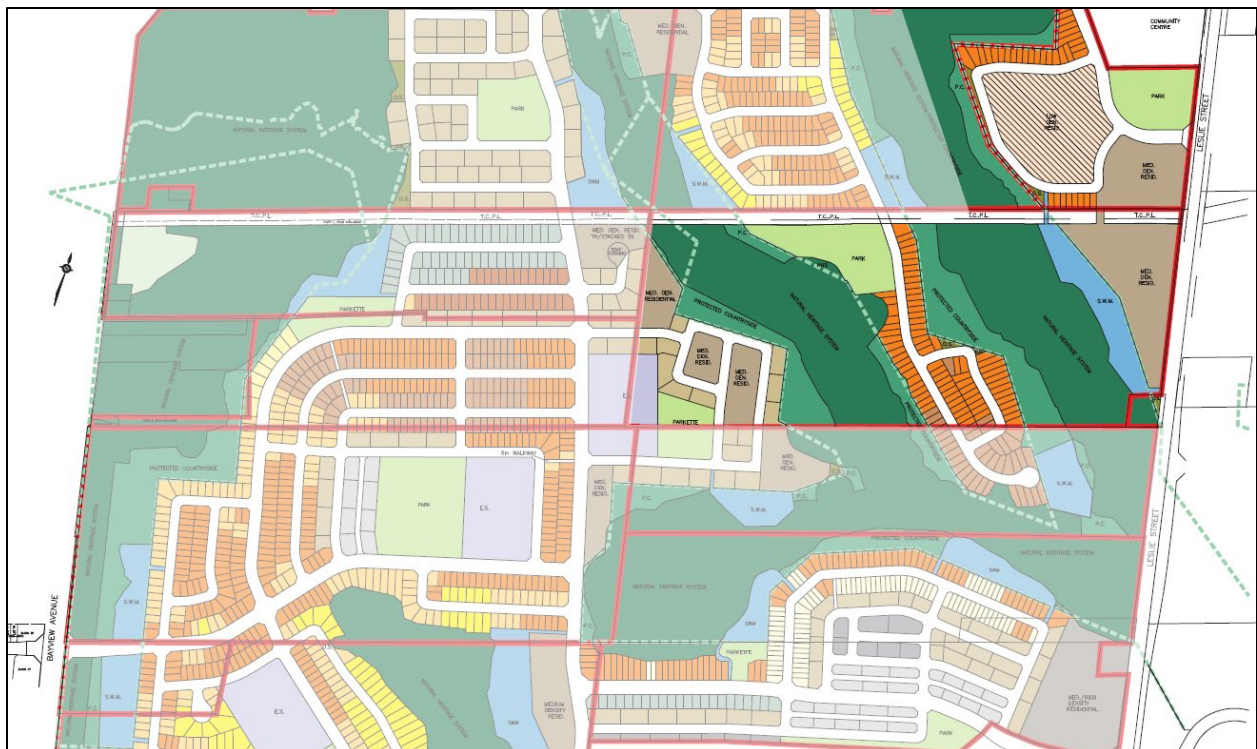


Figure 1 - Visual Illustration of Secondary Plan Area where the 11280 & 11430 Lands are situated. 11280 and 11430 Leslie Street are shown in full colour.

Adjustments to the 11280 & 11430 Leslie Greenbelt Boundaries

Currently, the Greenbelt boundaries within 11280 and 11430 Leslie create irregular configurations of agricultural table land that do not contain certain key environmental and natural heritage features. This proposal adjusts the boundaries to redesignate 7.46 hectares of such Greenbelt lands as settlement area in order to unlock 127 net new housing units within more regularly shaped development blocks without compromising the integrity of adjacent natural features. A 0.6-hectare portion of lands on 11280 Leslie incorrectly mapped and excluded from the Greenbelt are proposed to be added to the Greenbelt to complete the redesignations at 11280 and 11430 Leslie. For further information on the environmental features of 11280 and 11430 Leslie, please see the consulting report of Beacon Environmental – Greenbelt Boundary Assessment attached as Annex D.

The proposed areas to be redesignated/removed from the Greenbelt at 11280 and 11430 Leslie are adjacent to approved residential development blocks. Development within these areas would not impact (i) the limits of any existing identified significant environmental feature or associated buffer areas, or (ii) lands serving as linkages to adjacent significant environmental features.

Furthermore, such lands to be redesignated will not be viable agricultural lands if they are not redesignated. This is because such lands will (i) have an irregular configuration, (ii) have no suitable access to the roads or services their operations or equipment require, and (iii) be land locked or surrounded by conservation areas and residential development further compromising their ability to operate. For further information on the agricultural viability of the redesignated lands at 11280 and 11430 Leslie, please see the opinion letter of Colville Consulting Inc. Re 11280 and 11430 Leslie Street Greenbelt Lands and Suitability of Future Agricultural Uses attached as Annex H.

The Nischal Lands are a 14.01-hectare parcel in close proximity to 11280 and 11430 Leslie adjacent to the Holy Trinity Independent School. These lands located at the corner of Bayview and 19th Avenue and have significant natural heritage system features, wetlands, and woodlots. The Nischal lands are designated as Settlement Areas in the Oak Ridges Moraine and have transitional land with development rights grandfathered under the Oak Ridges Moraine Conservation Plan (ORMCP). Inclusion of these areas in the Greenbelt will significantly strengthen the Greenbelt because these sensitive features will now enjoy added protections. For further information on the environmental features of the Nischal Lands please see the consulting report of Ages Consultants Limited, Analysis of Ecology and Natural Heritage Systems attached as Annexes E & F.

Please find below some visual illustrations depicting the overall proposal and photography of on-site conditions at the Times North Leslie Lands.

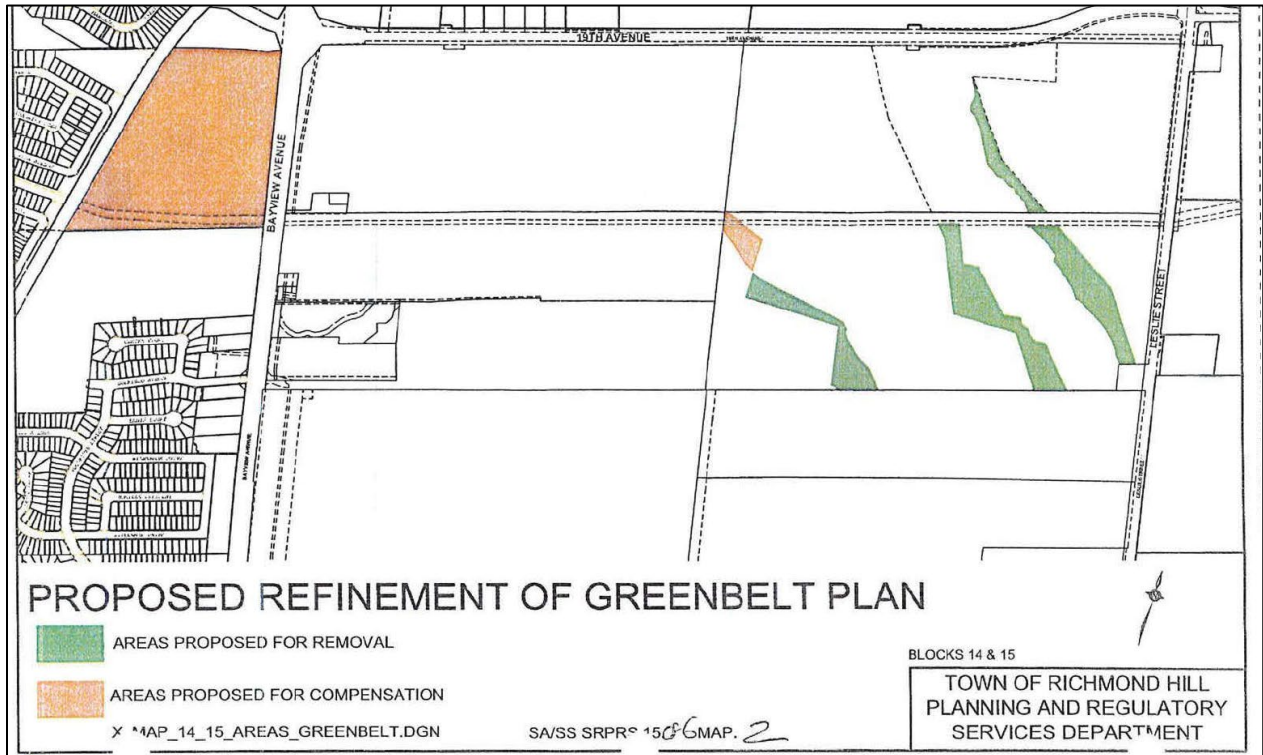


Figure 2 - Visual Illustration of Lands proposed to be added to Greenbelt (Orange) and removed/re-designated out of the Greenbelt (Green); Excerpt from City of Richmond Hill Planning Report SRPRS.15.141



Figure 3 - Aerial Photography of Nischal Lands currently Settlement Area in the ORM proposed to be added to the Greenbelt



Figure 4 - Photography of Agricultural Fields at 11280 Leslie Street (Photography by Beacon Environmental See Annex D)

Table 1 and 2 summarize the lands to be included into and removed/re-designated from the Greenbelt. The labels C1, D, R1-4 refer to the figures prepared by TMIG Engineering attached as Annex B.

Table 1: Areas to be Added to the Greenbelt – Portions of 11280 Leslie and ORM Settlement Area Lands (Nischal Lands)

Lands	Acreage (ha)	Features	Proposed Development Use
C1 – Northwest Block (11280 Leslie Street, Town of Richmond Hill)	0.6	Agricultural fields, portion of Watercourse B (Minor Tributary 2-1) and associated riparian vegetation (mixed age deciduous forest, Sugar Maple, Basswood, Green Ash and other hardwoods).	Medium Density Residential
D - Bayview and 19 th Area Lands	14.01	High aquifer vulnerability; containing wetlands and significant woodlands. Ministry of Natural Resources identified wetlands as being Provincially Significant.	Institutional
Total	14.61		

Table 2: Areas to be Removed/Redesignated from the Greenbelt – Portions of 11280 and 11430 Leslie Street

Lands	Acreage (ha)	Features	Proposed Development Use
R1 - Northeast Block (11280 Leslie Street, Town of Richmond Hill)	(2.08)	Agricultural fields previously planted with corn. No NHS features present.	Storm Water Management Pond
R2- Central Block (11280 Leslie Street, Town of Richmond Hill)	(2.69)	Agricultural fields and old field meadow. No NHS features present.	Residential, subject to approval of Town of Richmond Hill
R3- West Block (11280 Leslie Street, Town of Richmond Hill)	(1.73)	Agricultural fields and shrub hedgerow. No NHS features present.	Residential, subject to approval of Town of Richmond Hill
R4- West Block Northwest Block (11430 Leslie Street, Town of Richmond Hill)	(0.96)	Agricultural fields. No NHS features present.	Storm Water Management, subject to approval of Town of Richmond Hill
Total	(7.46)		
Net to Greenbelt:	14.61 - 7.46 = 7.15		

Net New Housing & Timeline for Completion

Icke Brochu is the project Architects for the development at 11280 and 11430 Leslie on behalf of Times Group. The figures below illustrate how the boundary adjustments will allow Times Group to deliver additional 6m townhouses and 11m single family homes. See Annex I for more drawings and details depicting the impact of the adjustment on the site plan unit yields.

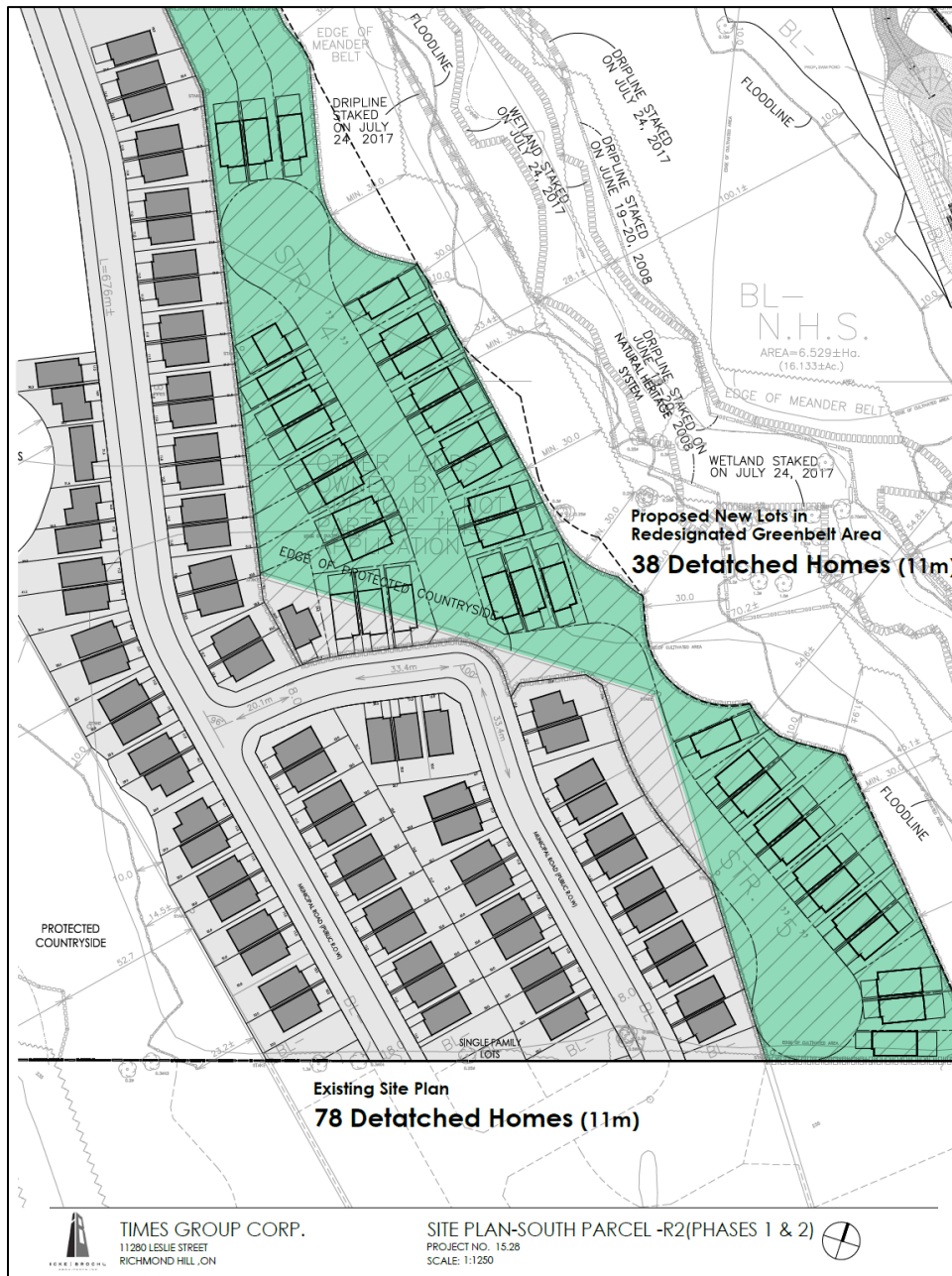


Figure 5 – Icke Brochu Site Plan depicting the layout of 38 Net New Detached Single-Family Homes in previously designated Greenbelt Areas at 11280 Leslie

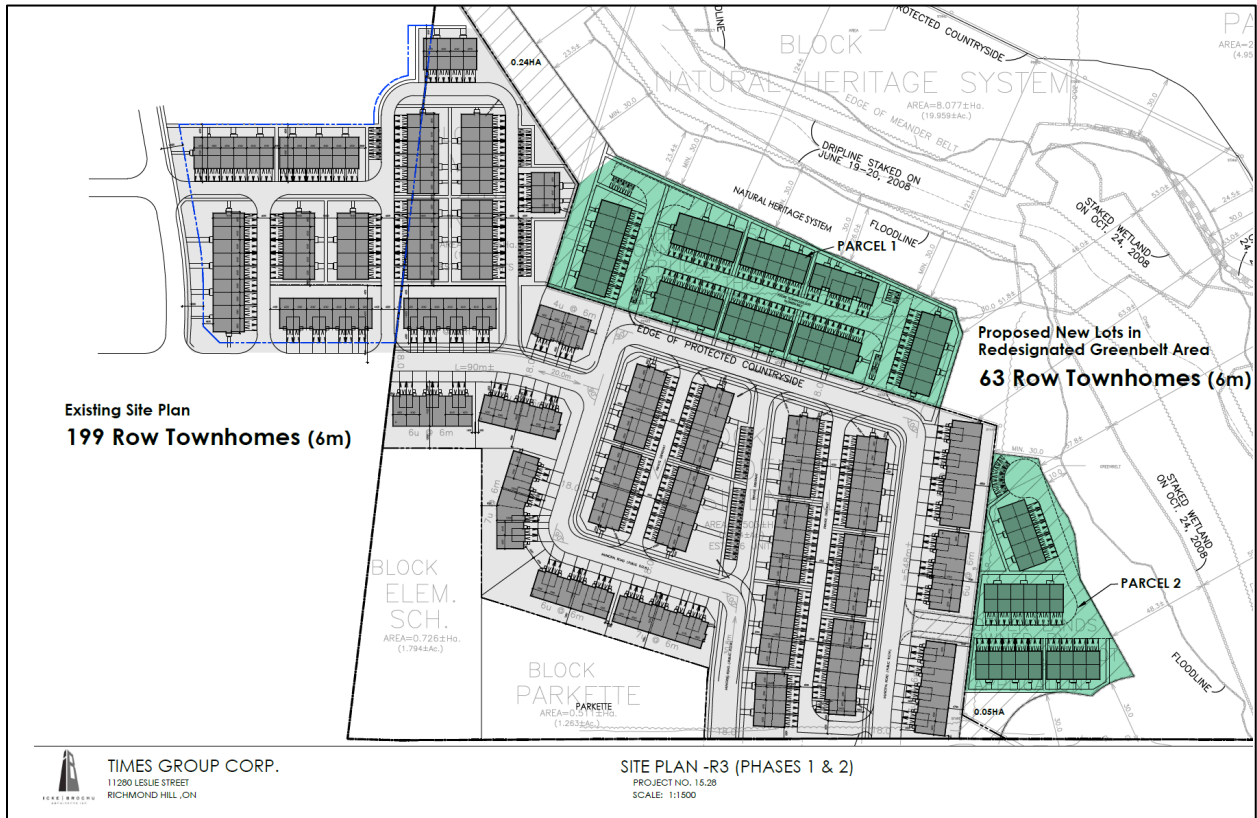


Figure 6 – Icke Brochu Site Plan depicting the layout of 63 Net New Townhomes in previously designated Greenbelt Areas at 11280 Leslie

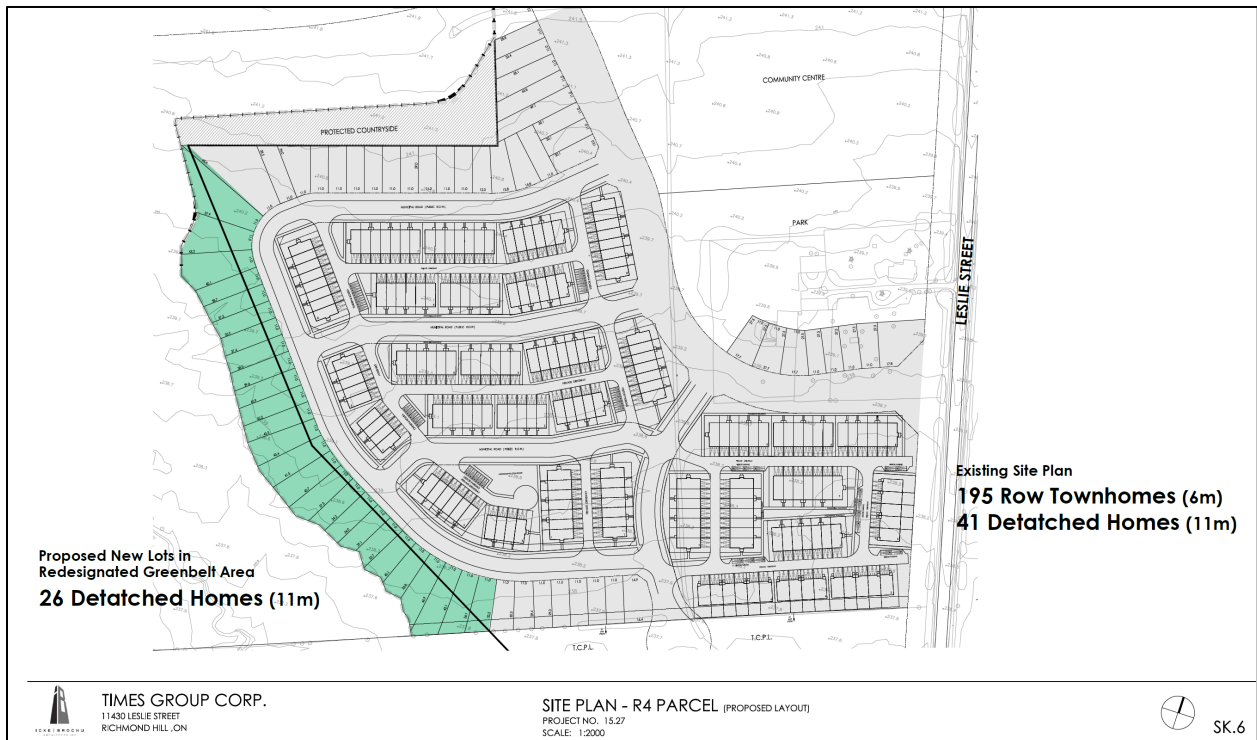


Figure 7 – Icke Brochu Site Plan depicting the layout of 26 Net New Detached Single Family Homes in previously designated Greenbelt Areas at 11430 Leslie

Infrastructure Efficiency

The Municipal Infrastructure Group (TMIG) (now operating as TYLin) acts as project servicing engineer for 11280 and 11430 Leslie, and on behalf of the area wide developer cost sharing group which is delivering the roads, services, schools, and parks for the developments bounded by Bayview and Leslie to the east/west, 19th Avenue and Elgin Mills to the north/south.

TMIG has confirmed that the development of North Leslie, and the subject lands, requires infrastructure including local and collector roads, watermains, sanitary sewers, storm sewers, and stormwater management ponds. These in the aggregate require a large investment which is predominantly a fixed cost. According to TMIG, this investment is not substantially increased by bringing into the development the 7.46 hectares, or the 127 new housing units proposed. The addition of these units therefore represents an excellent opportunity for both Times Group and the City of Richmond Hill to increase their supply of new single-family homes without requiring a major new investment in infrastructure and services. See the April 21, 2015, letter from David Ashfield, P. Eng. of TMIG at Annex C for more detail.

Servicing and Construction Timeline

Site alterations and grading commenced at 11280 and 11430 Leslie Street on September 20, 2022, with site servicing expected to be completed over the winter of 2023. Times Group expects to secure building permits for the townhouses and detached homes in 2023 and to delivery occupancy in 2025.



Figure 8 – Recent photography on-site at 11280 Leslie Street. CDC Contracting commenced site alterations and grading in September 2022.

City of Richmond Hill Staff and Council Support

Times Group worked closely with the former Commissioner of Planning and Regulatory Services at the City of Richmond Hill, Ana Bassios, to develop the proposal. In 2015 Times Group formerly submitted the proposal to the Planning Department at the City of Richmond Hill in order to secure a City Council approval.

The Planning Department at the City of Richmond Hill prepared Staff Report SRPRS.15.141 which was presented to City Council Committee of the Whole on July 13, 2015. The recommendations of the staff report were moved by Mayor Barrow and carried. A copy of the Staff Report SRPRS.15.141 is attached as Annex K and a copy of the Minutes of the Meeting of the Whole dated July 13, 2015, is attached as Annex L.

Accompanying Reports and Studies

In support of the proposal, Times Group has commissioned for the following reports and studies. Electronic access to these materials is available online at <https://tinyurl.com/2tx66384>:

a. Surveys

- a. Legal Surveys of Times North Leslie Lands (Annex A)

b. Engineering Analysis

- a. The Municipal Infrastructure Group, consulting engineers (TMIG now TYLin) Figures 1-3 attached as Annex B depicting the 11280 and 11430 Leslie lands and the lands proposed for redesignation/removal overlaid with limits of natural heritage features and associated environmental buffers. Included within Annex B is the TMIG Letter dated April 21, 2015, Re Methodology for the overlays and natural heritage system limits applied in the figures above.
- b. TMIG Letter dated April 21, 2015, Re Infrastructure Investments and Servicing Efficiency of the Proposal (Annex C).

c. Environmental Analysis

- a. Jo-Anne Lane B.Sc., Beacon Environmental – Greenbelt Boundary Assessment dated April 27, 2015, describing the environmental features of 11280 and 11430 Leslie Street dated April 27, 2015 (Annex D).
- b. Derek J. Coleman, Phd., R.P.P., M.C.I.P., Ages Consultants Limited, Analysis of Ecology and Natural Heritage Systems – Ecological Assessment of the Proposal and Review of Natural Heritage Systems of the Times North Leslie Lands dated September 9, 2016 (Annex E).
- c. Derek J. Coleman, Phd., R.P.P., M.C.I.P., Ages Consultants Limited, Ecological Value of Surplus Lands dated February 14, 2017 (Annex F).

d. Planning Report

- a. Roy Mason, KLM Planning Partners Inc. Opinion Letter Re Site Plan Efficiency of Proposed Subdivision dated April 27, 2015 (Annex G).

e. Agricultural Consulting Report

- a. Sean Colville, B.Sc., P.Ag., Colville Consulting Inc. Opinion Letter Re 11280 and 11430 Leslie Street Greenbelt Lands and Suitability of Future Agricultural Uses dated September 22, 2016 (Annex H).

f. Site Plan Drawings

- a. Andre Brochu, Icke Brochu Architects Inc. site plan drawings (Annex I)
- b. Community Development Plan (Annex J)

Concluding Remarks

We thank you for your consideration of this well-intentioned proposal. We believe our proposal is well positioned for consideration because the removal of the subject lands will in no way detract from the objectives or principles of the Greenbelt, while promoting important provincial planning policies that are critical for supporting efficient, affordable, and sustainable housing supply in Richmond Hill.

Should you require any further information, detail, updated report/study, or other information please do not hesitate to contact us directly at hessam@timesgroupcorp.com or hamid@timesgroupcorp.com.

Sincerely,



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