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Via Email

Mayor and Members of Council
c/o City Clerk
Toronto City Hall
100 Queen Street West
Toronto ON M5H 2N2

**Attention: Mayor and Members of Council c/o City Clerk via
councilmeeting@toronto.ca**

Dear Mayor and Members of Council:

**Re: Item - 2026.NY32.3
Wynford - Concorde Focused Area Study - Final Report ("Study")
Official Plan Amendment No. 902 ("OPA 902")
Planning Application Number 21 213197 NPS 00 TM
Written Submission to Council from St. Andrew Kim Parish, 849 Don Mills
Road**

We are counsel for St. Andrew Kim Parish, located at 849 Don Mills Road ("**Parish Property**"). The Parish Property is located at the northeast corner of Don Mills Road and Wynford Drive and is occupied by a two-storey place of worship containing St. Andrew Kim Catholic Church ("**St. Andrew Kim Parish**" or "**Parish**"). The remainder of the Parish Property consists of surface parking, along with landscaping and trees located along the north, west, and south lot lines.

St. Andrew Kim Parish, through the Roman Catholic Episcopal Corporation for the Diocese of Toronto, in Canada, ("**RCEC**") retained MacNaughton Hermesen Britton Clarkson Planning Limited ("**MHBC**") to review the Study and OPA 902, which implements Site and Area Specific Policy 932 ("**SASP 932**"), as it pertains to the Parish Property. This written submission reflects the review conducted by MHBC on behalf of RCEC.

Request

On behalf of the Parish and its community of worshippers, we respectfully request that Council adopt a site-specific policy amendment as outlined below or, in the alternative, defer adoption of OPA 902 to a future date to allow for discussions between the Parish and City staff to address the comments and significant concerns set out below.

Background

The Parish Property was recently the subject of an expropriation by Metrolinx for the Ontario Line Project. A significant portion of land along the property's Don Mills Road frontage was expropriated in October 2024. Prior to the expropriation, the Parish Property comprised 9,433.5 square metres of lot area.

In addition to the recent expropriation and resulting impacts on the Parish Property, the Study and OPA 902 propose a future widening of Wynford Drive to achieve a 30-metre right-of-way. This is anticipated to require a conveyance of approximately 3.5 metres from the Parish Property along its southern property line, in addition to enhanced public realm improvements to be considered through any future redevelopment.

Comments and Concerns

Cumulative Land Loss and Site Fragmentation

As noted above, the Parish Property has experienced a significant reduction in area as a result of the Metrolinx expropriation required to facilitate the Ontario Line subway infrastructure project. This acquisition encompassed 1,603.9 square metres of the western portion of the property fronting on Don Mills Road and consisted of both fee simple takings and easements. While the nature of these interests varies, their physical presence effectively results in an approximate 17% reduction in net site area.

The Metrolinx acquisition has materially altered the Parish Property's historical and functional relationship with the Don Mills Road corridor and has significantly constrained the site's functional area, including its ability to maintain existing site circulation, parking supply, landscaping, and flexibility for future improvements. The Study and OPA 902 introduce an additional constraint through the planned 30-metre right-of-way for Wynford Drive, which would require a further 3.5-metre land conveyance from the Parish Property's southern frontage.

Operational Viability and Institutional Function

The combined impact of the Ontario Line infrastructure within the expropriated lands and the proposed Wynford Drive widening presents a significant challenge to the long-term operational viability of St. Andrew Kim Catholic Church. The Metrolinx expropriation has already reduced the Property's parking supply by up to 34 spaces. The proposed municipal widening has the potential to remove an additional 32 parking spaces, resulting in a cumulative loss of up to 66 parking spaces.

In addition, the proposed widening and associated public realm improvements would further constrain opportunities for on-site landscaping, circulation, and overall site planning flexibility. Collectively, these impacts materially affect the Parish Property's ability to adequately serve its congregation and visitors. Furthermore, the Wynford Drive widening would affect the existing shrine, which was recently relocated to the southern side yard as a result of the Metrolinx expropriation.



Requirement for Policy Proportionality and Proposed Amendment to Recognize Site-Specific Considerations

Given the extraordinary circumstances affecting the Parish Property, it is recommended that OPA 902 be amended to include site-specific considerations recognizing the substantial provincial land takings that already affect the subject lands. Applying a standard 3.5-metre widening requirement to a property that has already been expropriated and significantly reduced in size does not adequately reflect the extent to which the Parish Property has been constrained in accommodating circulation, landscaping, parking, and long-term functionality.

It is recommended that consideration be given to revising the extent of the widening requirement for the Parish Property, including its removal or, at minimum, a reduction, along with the evaluation of alternative design solutions that continue to advance the Study's objectives. Providing this flexibility would help preserve the long-term viability of the Parish Property and ensure that the Parish's longstanding institutional role is not permanently compromised. This approach reflects the need to appropriately weigh competing considerations, including functional site requirements, long-term operational viability, future land use considerations, and broader public realm and transportation planning objectives.

Coordination of Local Planning with Transit Infrastructure

It is essential to clarify whether the Study fully accounts for the technical demands and physical footprint of the Ontario Line, including construction-related requirements and long-term operational conditions along Don Mills Road, as well as the implications of the proposed Wynford Drive widening.

The Parish Property is located within a corridor that will be directly affected by an elevated guideway, including requirements for structural clearances, emergency access, safety setbacks, and both construction-period management and ongoing operational interfaces. In this context, it is unclear whether the current Study framework, including the proposed widening and boulevard improvements, has fully reconciled these realities with its stated public realm objectives, particularly with respect to safety, compatibility, sequencing, and long-term functionality.

Accordingly, it is recommended that further study be undertaken to confirm that both OPA 902, including the proposed widening, is appropriately coordinated with the Ontario Line infrastructure and its associated constraints, to avoid conflicts that could limit site functionality and future redevelopment potential.

Summary and Request

We are hopeful that Council will take into consideration the significant concerns and requests submitted on behalf of St. Andrew Kim Catholic Church and its worshippers regarding the impact of the Study and OPA 902 on the Parish Property. It is important that OPA 902 be amended to address cumulative land loss, site fragmentation, operational viability, institutional function, policy proportionality, and coordination with transit infrastructure.

As noted above, on behalf of St. Andrew Kim Parish and its community of worshippers, we respectfully request that Council adopt a site-specific policy amendment as outlined herein or,



in the alternative, defer adoption of OPA 902 to a future date to allow for further discussions between the Parish and City staff to address the concerns outlined above.

With regards,

Yours truly,

MILLER THOMSON LLP

Per:

A handwritten signature in black ink, appearing to read 'T. Piurko', written over a horizontal line.

Tara L. Piurko
Partner
L.

- c. Marian Prejel, Senior Planner, Community Planning (Marian.Prejel@toronto.ca)
Fr Park, St. Andrew Kim Catholic Church
Dana Anderson, MHBC
David Finnegan, RCEC

