



Reply to the Attention of: Christie Gibson  
Direct Line: 416.307.4057  
Email Address: christie.gibson@mcmillan.ca  
Our File No.: 212523  
Date: May 19, 2026

**EMAIL ([clerk@toronto.ca](mailto:clerk@toronto.ca))**

**Toronto City Council**

13<sup>th</sup> Floor, West Tower  
Toronto City Hall  
100 Queen Street West  
Toronto, ON  
M5H 2N2

**Attention: John D. Elvidge, City Clerk**

Dear Mayor and Members of Council:

Re: **Item 2026.NY32.3 | City Council Consideration  
Proposed Official Plan Amendment 902 | Wynford - Concorde  
Amexon Property Management Corp. | 1200 Eglinton Avenue East,  
Toronto  
Request to Defer Item**

We are the solicitors for Amexon Property Management Corp. ("**Amexon**"), the owner of the property municipally known as 1200 Eglinton Avenue East (the "**Property**"), generally located in the northeast quadrant of Eglinton Avenue East and Don Mills Road. Item 2026.NY32.3 is scheduled for consideration by City Council at its meeting on May 20, 2026. We are writing to seek the deferral of consideration of the Item on the basis that such consideration would be premature.

Our client's planning consultant, Richard Domes, Gagnon Walker Domes Ltd., submitted a letter to North York Community Council dated April 28, 2026, wherein he identified numerous concerns. We are writing further to his letter (enclosed) to echo those concerns and to raise issue of the need for additional coordination of the various planning instruments that are proposed to apply to the Property.

### Property and Policy Context

The Property is a vacant 0.84 hectares (2.07 acres) site that enjoys direct frontage on Eglinton Avenue East and high transit connectivity, abutting the Aga Khan Park & Museum Station along the Eglinton Crosstown LRT (Line 5). The Property is located within Site and Area Specific Plan ("**SASP**") 684 per the Minister-approved Official Plan Amendment ("**OPA**") 575, which includes the Property within the boundaries of the Aga Khan Park & Museum Major Transit Station Area. The Property was previously located within an Employment District and designated General Employment Areas under the Toronto Official Plan, but in October 2024, through its settlement with the City of OPA 231, the Property was redesignated "Regeneration Areas". SASP 898 was introduced, applying only to the Property, and providing guidance on the preparation of a local area study intended to lead to the creation of a new SASP or Secondary Plan to govern the ultimate development of the Property for a mixed use development.

Amexon has been working in concert with abutting landowners to comprehensively master plan the redevelopment of the full block consisting of the Property, 15 Gervais Drive, and 39 Wynford Drive (the "**Block**") with respect to roads, parks, public realm, and built form. Following Pre-Application Consultation meetings with City Staff on October 30, 2025, wherein the representatives of the three properties presented the proposed master plan, Amexon will be filing its official plan and zoning by-law amendment applications for a mixed use development at the Property (the "**Site-Specific Applications**"). Site-specific applications for the two neighbouring sites within the Block have already been filed, and Amexon's Site-Specific Applications will be filed imminently.

Notwithstanding SASP 898 and its consequential study, and Amexon's Site-Specific Applications, the City has undertaken an additional study of the area, the Wynford-Concorde Focused Area Study, which has culminated in the City-initiated proposed OPA 902, before Council now for consideration. OPA 902 proposes the development of a new SASP 932 to establish a framework for "public realm, streetscape, and mobility"<sup>1</sup> within the study area (generally the lands bound by Eglinton Avenue East, Don Mills Road, Charles Sauriol Conservation Area, and the Canadian Pacific Railway corridor).

### Reasons for Seeking Adjournment

Despite our client's engagement in the City's public process for OPA 902, including but not limited to the enclosed letter of concern from our client's planning consultant, the City continues to advance proposed OPA 902, including now for consideration by City Council. Our client's outstanding concerns with the proposed policy have been entirely unaddressed, with the proposed policy remaining in conflict not only with its Site-Specific Applications and the three landowners' master plan, but also – in the view of our client's consultants – with good planning.

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<sup>1</sup> Wynford-Concorde Focused Area Study – Final Report, April 13, 2026, Report for Action, at 1.

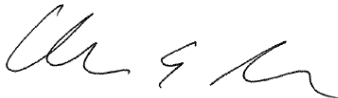
Further, the Block is also the subject of the Don Mills Regeneration Area Study, which proposes to bring forward a further OPA (the "**Don Mills Regeneration Area Study OPA**") in response to SASP 898, purporting to set out a high-level planning framework to guide the redevelopment of the study lands, including as it relates to "land use, parks and open space, phasing, streets, community services and facilities and built form".<sup>2</sup> The Don Mills Regeneration Area Study directly overlaps with proposed OPA 902, yet exists as a separate proposed policy and is scheduled to be considered by North York Community Council a full month following its consideration of proposed OPA 902, on May 26, 2026.

Taken together, there would be no less than five official plan amendments introduced or sought to be introduced in 2026 related to the Block. While the three coordinated landowner-initiated OPAs are coming forward, the two City-initiated OPAs are not coming forward in concert with each other and are in direct conflict with the landowner-initiated OPAs.

It is our request that City Council defer consideration of OPA 902 so that Staff can work with Amexon and the other property owners of the Block to ensure coordination of the emerging OPA framework while meeting the applicable requirements established in SASP 898. In the absence of coordinated OPAs we respectfully submit that consideration of OPA 902 must be deferred at least until such time as the Don Mills Regeneration Area Study OPA has been advanced through the municipal process such that they may be considered together.

Amexon remains available and interested in meeting with City staff to discuss its specific concerns with proposed OPA 902, in the spirit of seeing a coordinated and thoughtful redevelopment of its Property and the Block.

Yours truly,



Christie Gibson

Encls.

Cc: Amexon Property Management Corp., per: Joe Azouri  
Gagnon Walker Domes Professional Planners, per: Richard Domes

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<sup>2</sup> Ibid at 3.



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

**April 28, 2026**

GWD File: 1878.00

**North York Community Council  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2**

**Attention: Matthew Green, Administrator, North York Community Council  
([nycc@toronto.ca](mailto:nycc@toronto.ca))**

**Subject: Public Input Letter of Concern – Request to Defer Item  
Item NY32.3: April 29, 2026, North York Community Council Meeting;  
Wynford - Concorde Focused Area Study - Final Report;  
1200 Eglinton Avenue East, City of Toronto  
Amexon Property Management Corporation**

**Dear Chair and Members of North York Community Council:**

Gagnon Walker Domes Ltd. (“GWD”) represents Amexon Property Management Corporation (“Amexon”), the owner of the vacant 0.84 hectare (2.07 acres) property located at 1200 Eglinton Avenue East, in the City of Toronto (the “subject site”). The subject site has direct frontage along Eglinton Avenue East and abuts the Aga Khan Park & Museum Station along the Eglinton Crosstown LRT (Line 5).

The subject site is located within the ‘Wynford-Concorde Focused Area Study’ and as such is proposed to be subjected to City initiated Official Plan Amendment No. 902 (“OPA 902”), which proposes the development of a new Site and Area Specific Policy No. 932 (“SASP 932”) in Chapter 7 of the City’s Official Plan. SASP 932 proposes to establish new policies pertaining to the lands generally bound by Eglinton Avenue East, Don Mills Road, Charles Sauriol Conservation Area, and the Canadian Pacific Railway rail corridor; providing a framework for an enhanced public realm, streetscape, and mobility within the Study Area.

For the reasons indicated below, we are asking that Community Council defer consideration of this Item.

### **Amexon Does Not Support Staff Recommendations**

On behalf of Amexon, GWD has participated in the Wynford-Concorde Focused Area Study, which included attendance at the Open House Meetings hosted by City Staff on July 10, 2025 and December 2, 2025.

Amexon has reviewed the Wynford - Concorde Focused Area Study - Final Report dated April 13, 2026 (“Final Report”), which is scheduled to be considered by North York

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**GAGNON WALKER DOMES LTD.**

7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W0B4 • P: 905-796-5790  
[www.gwdplanners.com](http://www.gwdplanners.com) • Toll Free: 1-855-771-7266



Community Council on April 29, 2026. Amexon has significant concerns with OPA 902. For the reasons outlined below, Amexon requests that North York Community Council not adopt the Staff recommendations identified in the Final Report and instead refer the matter back to Community Planning Staff with the direction that Staff conduct additional consultation with all stakeholders, including Amexon, to address outstanding concerns. As discussed in more detail below we respectfully submit that it is premature to approve OPA 902 (SASP 932) in advance of the ongoing Don Mills Regeneration Area Study as both impact the future development of the subject site and it is imperative that there should be consistency in the City's policy documents.

## **Background**

### **Amexon's Previous Employment Area Conversion**

The subject site was previously located within an 'Employment District' and designated 'General Employment Areas' in the City of Toronto Official Plan. In October 2024, through settlement of Amexon's Ontario Land Tribunal appeal of City of Toronto Official Plan Amendment No. 231 ("OPA 231") the subject site was removed from an 'Employment District' and redesignated to 'Regeneration Areas'.

Amexon's settlement of OPA 231 also introduced Site and Area Specific Policy No. 898 ("SASP 898") to Chapter 7 of the Official Plan. SASP 898 only applies to the subject site. SASP 898 provides guidance on the preparation of a local area study being conducted leading to the creation of a new Site and Area Specific Policy, or Secondary Plan to govern the ultimate development of the subject site for mixed use development.

### **Amexon's Official Plan and Zoning By-law Amendment Application**

Amexon is in the process of finalizing an Official Plan and Zoning By-law Amendment Application that proposes mixed use development on the subject site. Amexon's Pre-Application Consultation Application for the proposed development was submitted to the City on September 23, 2025 and the Pre-Application Consultation meeting was held with City Staff on October 30, 2025.

Amexon's site specific application is being coordinated with the abutting landowners located at 15 Gervais Drive and 39 Wynford Drive. These three (3) separate landowners have been working collaboratively for a number of years to put forward a coordinated design for the three (3) properties located at the northeast quadrant of Eglinton Avenue East and Gervais Drive, which address various provincial and municipal planning objectives. Although each landowner is working towards submitting its own separate development application(s), the proposed plans for each property have been extensively coordinated to provide for a comprehensive master planning approach with respect to roads, parks, public realm and built form.

Amexon's site-specific Official Plan and Zoning By-law Amendment Application shall inform and address the planning requirements of SASP 898. Submission of Amexon's Official Plan and Zoning By-law Amendment Application to the City of Toronto is imminent.



### Don Mills Regeneration Areas Study

In the Summer of 2025, the City of Toronto initiated the Don Mills Regeneration Area Study. The City's Don Mills Regeneration Areas Study is being undertaken, in part, to satisfy the requirement for the completion of a local area study towards the development of new policies that will be applicable to the subject site, along with the Regeneration Areas lands located on the abutting parcels at 39 Wynford Drive and 15 Gervais Drive (along with separate sites located on Leslie Street).

Amexon has been heavily engaged with the City on the Don Mills Regeneration Area Study process, given the direct impact that future policy would have on the future development of the subject site. This has most recently included the submission of a formal letter of concern on March 24, 2026 to the City's Strategic Initiatives, Policy & Analysis Section outlining Amexon's concerns with the initial draft policies proposed through the Don Mills Regeneration Area Study process.

While separate planning processes, a number of very similar policy and structure elements are being advanced by the City through the Don Mills Regeneration Areas Study and through the Wynford - Concorde Focused Area Study. Some of the draft policies and structure elements being advanced by the City through OPA 902 have previously been identified as concerns by Amexon, including through the overlapping Don Mills Regeneration Areas Study.

The Don Mills Regeneration Area Study process remains on-going.

### **Amexon's Concerns with Proposed OPA 902/ SASP 932**

The following identifies Amexon's concerns with proposed OPA 902 and SASP 932 as they pertain to the subject site:

- **OPA is Premature:** Currently, proposed OPA 902 and SASP 932 propose to advance similar and/or overlapping policy directions to those emerging policies that are currently being developed for the on-going Don Mills Regeneration Area Study process. Numerous concerns have been raised by Amexon, as well as other landowners, on the initial draft policies of the Don Mills Regeneration Area Study, which apply to the Wynford - Concorde Focused Area Study and OPA 902/SASP 932.

Given the overlapping geographic planning areas pertaining to Wynford - Concorde Focused Area Study and the Don Mills Regeneration Area Study, and considering that the Don Mills Regeneration Area Study process remains on-going, it would be premature for North York Community Council to consider OPA 902/SASP 932 in isolation of future policy advanced through the Don Mills Regeneration Area Study process.

Similarly, it would be premature for North York Community Council to direct staff at this time to use the Wynford-Concorde Mobility Strategy, as contained in



Attachment 5 of the Final Report in the evaluation of future development applications (Staff Recommendation No. 5).

- OPA is Inconsistent with Amexon and Abutting Landowners Master Plan: Coordinated site-specific development applications have been submitted, or are being finalized, by Amexon and the abutting owners of 15 Gervais Drive and 39 Wynford Drive which proposed a comprehensive master planned development for the northeast quadrant of Eglinton Avenue East and Gervais Drive. The master plan prepared for the subject site, 15 Gervais and 39 Wynford Drive has informed the extensive landowner feedback provided to the City as part of the future planning framework for the aforementioned properties. Formal Pre-Application Consultation pertaining to the site-specific development application(s) has also been conducted with the City.

Proposed OPA 902 and SASP 932 are inconsistent with the coordinated master plan advanced by Amexon and the abutting landowners.

- SASP 932, Public Realm Policy a) i - iii) – The draft policy provides general direction that new development be encouraged to provide sidewalk and boulevard enhancements along a specified list of public streets located within the OPA 902/SASP 932 Study Area. However, based on the proposed policy language it is not sufficiently clear if this policy is proposed to only apply to those public streets specifically listed.
- SASP 932, Pedestrian Connections Policy b) i) – The draft policy encourages development proponents to examine opportunities to provide privately-owned publicly access open spaces (“POPS”), including mid-block connections, within new development proposals; however, the policy further suggests that such spaces/connections be provided pursuant to the locations and alignment generally shown on Map 2 and Map 3 of SASP 932. The policy language is inconsistent. Further, while Amexon does not oppose the integration of potential pedestrian connections as part of the development of the subject site in principle, Amexon does not support the identification of the ‘Potential Active Connection’ and ‘Potential Midblock Pedestrian Connection’, as shown on Map 2 and Map 3 of SASP 932. The appropriateness and potential locations of these connections should be removed from the Maps and determined through Amexon’s site specific development application.
- SASP 932, Building Setbacks Policy c) i) – The draft policy should include more flexible wording to identify that the ground floor of new buildings will have active, street related uses, “where appropriate”. Insertion of the words “where appropriate” will provide the necessary flexibility during the review of development applications that this policy will not apply where it is determined that, based on site specific circumstances, active uses at grade are not appropriate or feasible.
- SASP 932, Building Setbacks Policy c) ii)a) – The draft policy requires that a “tower-in-the park” landscape condition be required for new development within



the Wynford - Concorde Focused Area Study Area. The subject site fronts directly onto Eglinton Avenue East, is located within the Aga Khan Park & Museum Major Transit Station Area and is located within direct proximity of the Aga Khan Park & Museum and Don Valley stations along the Crosstown LRT (Line 5), along with future immediate access to the Ontario Line. “Tower-in-the park” development is not appropriate or desirable on the subject site due to its location along Eglinton Avenue East, proximity to transit, and the development opportunity it presents.

- SASP 932, Building Parkland Policy d) i) – Amexon does not support the location of the ‘Potential Future Park’ identified on the subject site on Map 2. The locations of public parks are yet to be resolved through the site-specific development applications and the Don Mills Regeneration Areas Study. As a result, Amexon does not support this draft policy until such time as Map 2 is amended to reflect the general location of the future potential park proposed on the subject site pursuant to Amexon’s site specific development plan and the landowner master plan.
- SASP 932, Don Valley Parkway Interchanges Policy h) i)-ii) - These policies require that development applications be responsible, in part, for potential interchange improvements for the Don Valley Parkway. The study of potential interchange improvements, as well as any identified improvements, are out of the scope of a private development application. Further, as noted in the Final Report the City may not be the final decision-making authority regarding any modifications to the Don Valley Parkway interchanges pursuant to the Ontario-Toronto New Deal provincial upload commitment.
- Map 2, Draft Public Realm Map – Amexon does not support the identification of the ‘Potential Active Connection’ and ‘Potential Midblock Pedestrian Connection’ on the subject site, as shown on Map 2 of SASP 932. The appropriateness and potential location of these connections should be removed from the Maps and determined through Amexon’s site specific development application. Further the conceptual location of the ‘Potential Future Park’ on the subject site is inconsistent with the Amexon development proposal and landowner master plan. Map 2 should be revised to reflect the general location of the future potential park proposed at the northeast corner of the subject site as proposed by Amexon, or alternatively delete the ‘Potential Future Parks’ overlay from the subject site.
- Map 3, Draft Mobility Map – As noted above, Amexon does not support the identification of the ‘Potential Active Connection’ and ‘Potential Midblock Pedestrian Connection’ on the subject site, as shown on Map 2 of SASP 932. Further, the broad and ambiguous ‘Conceptual New Public Street Location’ overlay on Map 2 is not supported by any corresponding policy direction in SASP 932. Accordingly, this overlay should be removed from the Map. The appropriateness of potential public streets on the subject site (as well as 15 Gervais Drive and 39 Wynford Drive) should be determined through site-specific development applications and the landowners master plan submitted by the owners of these lands.



## **Final Statements**

For the reasons outlined above, it is our opinion that North York Community Council's consideration of OPA 902 and SASP 932 would be premature at this time on account of the ongoing Don Mills Regeneration Area Study and identified inconsistencies with the coordinated development proposal being prepared for 1200 Eglinton Avenue East. Accordingly, we request that North York Community Council defer consideration of OPA 902 and refer Staff Recommendations back to Community Planning Staff with the direction that Staff conduct additional consultation with all stakeholders, including Amexon, in effort to address outstanding concerns.

**Regards,**

**Richard Domes**  
**Partner, Principal Planner**

C.C.: J. Azouri, Amexon Property Management Corporation  
C. Gibson/M. Flynn-Guglietti, McMillan LLP  
M. Gagnon, Gagnon Walker Domes Ltd.  
M. Prejel, City of Toronto