



June 19, 2026

Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Delivered via email to clerk@toronto.ca and councilmeeting@toronto.ca

Dear Members of City Council,

***Re: Item TE33.10 – City Council (June 24 – 26, 2026) Proposed Official Plan Amendment No. 914
Liberty for All Regeneration Area Study
Intentional Capital***

We are the owner of properties at 147 Liberty St. & 54 – 68 Fraser Ave. in Liberty Village, collectively the “subject lands”. We are writing to provide comments and objections to some of the policies in the proposed Official Plan Amendment 914, prepared through the Liberty for All Regeneration Area Study.

While we appreciate the extensive work undertaken by City staff, we have concerns with several proposed policies in OPA 914. As drafted, the amendment introduces new obligations that are inconsistent with existing policy frameworks, misaligned with recent provincial decisions, and premature given the need for further consultation with affected landowners.

1. Non-residential space requirements.

Draft Policies 2.1 – 2.7 impose minimum non-residential gross floor area requirements for new development in Liberty Village West, including:

- A requirement to maintain and enhance existing non-residential GFA
- A minimum of 15% non-residential GFA for mixed-use development
- An increase to 20% following the opening of the Ontario Line to Exhibition Station

These requirements are not supported by market evidence and do not reflect the evolving land-use context of Liberty Village. As noted in the City’s own Office Needs Study and the Liberty Village Economic Development Study prepared by N. Barry Lyon Consultants Ltd., rigid non-residential requirements risk sterilizing development and delaying much-needed housing supply.

We therefore request:

- Removal or significant modification of Policies 2.1 – 2.7
- Introduction of flexibility for non-residential GFA similar to the approach taken in Liberty Village East
- Clarification of the inconsistent use of “non-residential” vs. “employment” GFA across OPA 914 and existing SASPs



These changes are necessary to ensure that redevelopment of the subject lands can proceed in a viable and balanced manner. As the subject lands fall within the Liberty Village West area, Policies 2.1 – 2.7, if adopted as drafted, will undermine the economic feasibility for redevelopment plans to proceed on the subject lands to deliver much-needed housing in the near future.

2. Housing Policies

Draft policies 3.4 – 3.6 introduce affordable housing requirements that conflict with the Provincial inclusionary zoning framework, which:

- Caps affordability housing requirement at 5%
- Limits affordability period to 25 years
- Applies only with Protected Major Transit Station Areas (PMTSAs)
- Is currently paused until July 1, 2027

OPA 914 should be revised to remove or defer affordable housing requirements until the inclusionary zoning framework resumes. Any additional affordable housing beyond the in-effect provincial IZ framework should be provided as an in-kind contribution of the Community Benefits Charge (CBC).

In our opinion, adoption of OPA 914 at this time would be premature. The proposed policies introduce significant new obligations that require further consultation, refinement, and alignment with existing provincial and municipal frameworks.

We respectfully request that:

- OPA 914 be deferred, and
- City staff continue discussions with affected landowners, including the owner of 147 Liberty Street and 54–68 Fraser Avenue.

Please provide notice of any future reports, meetings, or decisions related to this matter. We would welcome the opportunity to meet with staff to discuss our client's plans and the concerns outlined in this letter.

Yours Truly,

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