



July 28, 2026

Mayor and City Council
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Attention: Sylwia Przezdziecki

Re: Ryding Lands Study – Directions Report
Agenda Item: 2026.EY33.14

We are the planning consultants for Urros Investments Inc., the registered owners of the lands municipally known as 116, 116R, 126, 132, 140 and 142 Ryding Avenue (the “subject site”), which are located on the north side of Ryding Avenue, east of Gourlay Crescent.

On behalf of Urros Investments Inc., we respectfully provide the following comments on the City’s “Ryding Lands Study – Emerging Directions” (Attachment 8 to the Directions Report, dated June 17, 2026). The Ryding Lands Study was initiated in December 2025 and undertaken by the city to satisfy the completion of a local area study. The purpose of the study is to establish a planning framework for how the area will grow, including the provision of an appropriate mix of land uses, supporting infrastructure and community services, and connections with the wider community. The Ryding Lands include the subject site and the adjacent properties municipally known as 99 and 109 Ryding Avenue and 90 Ethel Avenue (the “Ungerman Lands and the Paletta Lands”, respectively). Urros Investments Inc. has been actively participating in the study, with representatives having attended both public meetings and two separate landowner meetings with City staff.

As well, in response to the City’s invitation for stakeholders to provide comments on the City’s “Ryding Lands Study - Emerging Directions”, as presented at the April 15, 2026 public meeting, we provided comments on the then proposed emerging directions to City Planning staff in a written submission dated June 3, 2026 (attached).

The Ryding Lands were converted from *Core Employment Areas* to *Mixed Use Areas* through Official Plan Amendment (“OPA”) 653, which was approved by the Minister of Municipal Affairs and Housing on January 27, 2025. OPA 653 also introduced Site and Area Specific Policy (“SASP”) 832, which sets out the requirements of a local area for the Ryding Lands. It is our understanding that the study would result in a new SASP which would replace the current policies of SASP 832.

On February 20, 2026, on behalf of Urros Investments Inc., we submitted a combined Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) applicant to facilitate the redevelopment of the subject site. The application was deemed complete as of April 2, 2026.

The draft OPA submitted as part of our site-specific application would apply to the entirety of the Ryding Lands and was coordinated with, and supported by, the adjacent landowners. The draft OPA introduces a new SASP which provides a planning framework to guide the redevelopment of the Ryding Lands, and includes policies related to land use, public realm, built form, the road network, community service and facilities, and parks, among other matters.

The ZBA application only applies to the subject site and proposes a mixed-use development comprised of two 3- to 6-storey podium buildings and three towers of 20, 34 and 26 storeys. A child care centre with an outdoor play space and a 906 square metre public park are also proposed. Future redevelopment of the remainder of the Ryding Lands would occur when the other landowners are ready to advance their own site-specific development applications.

In our opinion, the draft OPA submitted through our site-specific application, which was developed in coordination with the adjacent landowners, provides for a collaborative approach for the future redevelopment of the Ryding Lands.

We appreciate the opportunity to comment on the City’s updated Emerging Directions, as set out below.

Emerging Direction #1: Transformation through intensification and a mix of uses

We agree with the recognition that the Ryding Lands are anticipated to experience transformative change, from low-scale industrial uses to a more intensely developed area with a mix of land uses requiring new streets and blocks, servicing, public spaces and amenities. However, the City’s language regarding “careful coordination and phasing” is somewhat vague. Our client has already engaged in extensive coordinated efforts with the adjacent landowners, resulting in a draft OPA and SASP which provides for an agreed-upon framework for the future redevelopment of the Ryding Lands. It is unclear what the City is seeking with respect to phasing.

Emerging Direction #10: Ensure a minimum amount of non-residential space to support complete communities

We appreciate that staff have revised this direction, which previously prescribed that 1.0 times the site area (after space for parks, public streets and public lanes is removed) or

15 percent of the building space (whichever is less) be provided for non-residential uses. The revised direction has been made more permissive, requiring that new development include space for non-residential uses, without prescribing a minimum amount.

As part of the site-specific application, a Market & Economic Brief was prepared by Parcel Economics Inc. ("Parcel"), which concludes that the subject site and surrounding area do not form a meaning office employment node, nor is it likely to become one in the future. Parcel also notes that the areas immediately surrounding the subject site are well-served from a commercial market perspective. While there is some opportunity for growth in employment on the subject site (e.g., such as through the proposed child care facility and work-from-home options), given the challenging market conditions and a risk of a saturated retail/service commercial market in the area in the short term, Parcel concludes that developing non-residential uses on the subject site will be difficult.

Emerging Direction #12: Protect existing and provide space for new trees

Although it is expected that new buildings would generally be set back from public streets to provide space for soft landscaping, trees and other vegetation, there may be instances where it is appropriate that new buildings, or portions of new buildings, be brought to the edge of the street. In these instances, built form flexibility should be maintained, and the policies of the future SASP should be flexible in providing more generalized performance standards (i.e. development will generally be set back a minimum of...) to respond to site-specific constraints.

Emerging Direction #13: Encourage the provision of consolidated parkland

We acknowledge that park space is required as part of redevelopment of the Ryding Lands. The landowners have coordinated on the submission of a draft OPA, which includes a Structure Plan that identifies conceptual park locations. As part of the site-specific Zoning By-law Amendment application, a proposed park has been shown on the subject site.

Emerging Direction #19: A range of housing options should be provided where residential is permitted

It is our opinion that unit mix / unit proportion should be encouraged and not mandated in order to reflect market realities. OPA 537 did not include a policy related to unit mix, as unit mix is typically sought through the Growing Up Guidelines. The site-specific Zoning By-law Amendment application for the subject site has provided a unit mix that is in keeping with the recommendations of the Growing Up Guidelines.

Emerging Direction #23: Implementation should be supported by development coordination and servicing analysis

As noted, the landowners of the Ryding Lands have coordinated with the adjacent landowners on the submission of the draft OPA and are in agreement regarding its policies and objectives. Our client is open to additional discussion and coordination, as necessary, and has advanced a Zoning By-law Amendment application for their lands.

Conclusion

We appreciate the opportunity to comment on the City's updated Emerging Directions for the Ryding Lands Study (dated June 17, 2026).

We would like to continue to be notified of any updates or decisions on this matter. If you require any clarification or wish to discuss these matters further, please do not hesitate to contact Katie Hickey, Karla Tamayo, Graham Barrett or the undersigned.

Yours very truly,

Bousfields Inc.



Mike Bissett, MCIP, RPP

cc: *Michael Foderick, McCarthy Tetrault*



June 3, 2026

Jessica Krushnisky, Senior Planner
Strategic Initiatives, Policy & Analysis
City of Toronto, Metro Hall
55 John Street, 22nd Floor
Toronto, ON
M5V 3C6

Dear Ms. Krushnisky,

Re: Comments in Response to the Ryding Lands Study – Emerging Directions

We are the planning consultants for Urros Investments Inc., the registered owners of the lands municipally known as 116, 116R, 126, 132, 140 and 142 Ryding Avenue (the “subject site”), which are located on the north side of Ryding Avenue, east of Gourlay Crescent.

On behalf of Urros Investments Inc., we respectfully provide the following comments on the City’s Ryding Lands Study – Emerging Directions (dated April 15, 2026). The Ryding Lands Study was initiated in December 2025 and undertaken by the city to satisfy the completion of a local area study. The purpose of the study is to establish a planning framework for how the area will grow, including the provision of an appropriate mix of land uses, supporting infrastructure and community services, and connections with the wider community. The Ryding Lands include the subject site, and the adjacent properties municipally known as 99 and 109 Ryding Avenue and 90 Ethel Avenue (the “Ungerman Lands and the Paletta Lands”, respectively). Urros Investments Inc. has been actively participating in the study, with representatives having attended both public meetings and two separate landowner meetings with City staff.

The Ryding Lands were converted from *Core Employment Areas* to *Mixed Use Areas* through Official Plan Amendment (“OPA”) 653, which was approved by the Minister of Municipal Affairs and Housing on January 27, 2025. OPA 653 also introduced Site and Area Specific Policy (“SASP”) 832, which sets out the requirements of a local area for the Ryding Lands. It is our understanding that the study would result in a new SASP which would replace the current policies of SASP 832.

The properties comprising the Ryding Lands are owned by three separate landowners who, prior to the initiation of the Ryding Lands Study, have been working collaboratively to put forward a coordinated plan for these lands.

On February 20, 2026, on behalf of Urros Investments Inc., we submitted a combined Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) applicant to facilitate the redevelopment of the subject site. The application was deemed complete as of April 2, 2026.

The draft OPA submitted as part of our site-specific application would apply to the entirety of the Ryding Lands, and was coordinated with, and supported by, the adjacent landowners. The draft OPA introduces a new SASP which provides a planning framework to guide the redevelopment of the Ryding Lands, and includes policies related to land use, public realm, built form, the road network, community service and facilities, and parks, among other matters.

The ZBA application only applies to the subject site, and proposes a mixed-use development comprised of two 3- to 6-storey podium buildings and three towers of 20, 34 and 26 storeys. A child care centre with an outdoor play space and a 906 square metre public park are also proposed. Future redevelopment of the remainder of the Ryding Lands would occur when the other landowners are ready to advance their own site-specific development applications.

In our opinion, the draft OPA submitted through our site-specific application, which was developed in coordination with the adjacent landowners, provides for a collaborative approach for the future redevelopment of the Ryding Lands.

We appreciate the opportunity to comment on the City’s Emerging Directions, as set out below.

A. Emerging Direction #1. General Category: Intent

We agree with the recognition that the Ryding Lands are anticipated to experience transformative change, from low-scale industrial uses to a more intensely developed area with a mix of land uses requiring new streets and blocks, servicing, public spaces and amenities. However, the City’s language regarding “careful coordination and phasing” is somewhat vague. Our client has already engaged in extensive coordinated efforts with the adjacent landowners, resulting in a draft OPA and SASP which provides for an agreed-upon framework for the future redevelopment of the Ryding Lands. It is unclear what the City is seeking with respect to phasing.

B. Emerging Direction #2. General Category: Study Boundary

We support the direction to include the properties on the east side of Cobalt Avenue in the Study Boundary.

Redesignating these lands from *Neighbourhoods* to *Mixed Use Areas* is logical and would allow opportunities for additional housing supply.

C. Emerging Direction #4. General Category: Streets and Blocks

We support the extension of Ryding Avenue in an eastward direction, connecting with Keele Street, and the extension of Mondovi Gate from St. Clair Avenue West south to Ryding Avenue. This configuration is shown in Schedule B of the draft OPA which has been submitted for the Ryding Lands.

D. Emerging Direction #6. General Category: Streets and Blocks

Through our site-specific application, a laneway system has been proposed, in keeping with this emerging direction, and provision has been made for an ultimate 6-metre wide east-west public laneway, to be shared with the adjacent site to the north (i.e. at 2231 and 2255 St. Clair Avenue West).

E. Emerging Direction #9. General Category: Land Use

We have concerns with the direction requiring that 1.0 times the site area (after space for parks, public streets and public lanes is removed) or 15 percent of the building space (whichever is less) be provided for non-residential uses.

As part of the site-specific application, a Market & Economic Brief was prepared by Parcel Economics Inc. ("Parcel"), which concludes that the subject site and surrounding area do not form a meaning office employment node, nor is it likely to become one in the future. Parcel also notes that the areas immediately surrounding the subject site are well-served from a commercial market perspective. While there is some opportunity for growth in employment on the subject site (e.g., such as through the proposed child care facility and work-from-home options), given the challenging market conditions and a risk of a saturated retail/service commercial market in the area in the short term, Parcel concludes that developing non-residential uses on the subject site will be difficult.

Accordingly, it is our opinion that the non-residential requirement should be removed and the policies of the future SASP should be flexible, given the current context of the office market.

F. Emerging Direction #11. General Category: Public Realm

Although it is expected that new buildings would generally be set back from public streets to provide space for landscaping, there may be instances where it is appropriate that new buildings, or portions of new buildings, be brought to the edge of the street. In these

instances, built form flexibility should be maintained, and the policies of the future SASP should be flexible in providing more generalized performance standards (i.e. development will generally be set back a minimum of...) to respond to site-specific constraints.

G. Emerging Direction #12. General Category: Public Realm

We acknowledge that park space is required as part of redevelopment of the Ryding Lands. The landowners have worked together to prepare a draft OPA, which includes a Structure Plan that identifies conceptual park locations. As part of the site-specific Zoning By-law Amendment application, a proposed park has been shown on the subject site.

H. Emerging Direction #14. General Category: Public Realm

It is our opinion that numerical standards are more appropriate in zoning by-laws. Accordingly, we recommend that the policies of the future SASP include language that speaks to providing appropriate setbacks, or more generalized performance standards (i.e. development will generally be set back a minimum of...) to respond to site-specific conditions.

I. Emerging Direction #15. General Category: Buildings/Built Form

We have concerns with the direction that development on the Ryding Lands should generally be at a lower scale than what would be permitted closer to the planned St. Clair-Old Weston Station (where a maximum height of 35 storeys is generally permitted). In our opinion, this emerging direction does not recognize the existing and planned context, which includes approved towers of 34 storeys at 87 Ethel Avenue, as well as heights greater than 35 storeys within the Keele-St. Clair area (i.e. approved heights of up to 48 storeys at 0, 119-125, 144, 160 & 200 Benny Stark Street and 116-122 Turnberry Avenue). The existing and planned context should be acknowledged as part of the future policies of the SASP.

While a general height range for tall buildings may be identified in the Official Plan, maximum building heights should be determined through the zoning by-law amendment process.

J. Emerging Direction #18. General Category: Housing

It is our opinion that unit mix / unit proportion should be encouraged and not mandated in order to reflect market realities. OPA 537 did not include a policy related to unit mix, as unit mix is typically sought through the Growing Up Guidelines. The site-specific Zoning By-law Amendment application for the subject site has provided a unit mix that is in keeping with the recommendations of the Growing Up Guidelines.

K. Emerging Direction #23. General Category: Coordination and Implementation

As noted, the landowners of the Ryding Lands have worked together to advance the proposed draft OPA and are in agreement regarding its policies and objectives. Our client is open to additional discussion and coordination, as necessary, and have advanced a Zoning By-law Amendment application for their lands.

Conclusion

We appreciate the opportunity to comment on the City's Emerging Directions for the Ryding Lands Study, and we look forward to reviewing the refined directions when they are available.

We would like to continue to be notified of any updates or decisions on this matter. If you require any clarification or wish to discuss these matters further, please do not hesitate to contact Katie Hickey, Karla Tamayo, Graham Barrett or the undersigned.

Yours very truly,

Bousfields Inc.



Mike Bissett, MCIP, RPP

cc: *Michael Foderick, McCarthy Tetrault*