

July 6, 2026

By E-Mail to *etcc@toronto.ca*

Etobicoke York Community Council
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Attention: Nancy Martins, Committee Administrator

Dear Ms. Martins:

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

Background

We are counsel to: (i) Irving Ungerman Limited, Karl Ungerman Limited, Shar Tem Holdings Limited, St. Clair Poultry Packers Co. Limited and Stork Wasser Realty Limited (collectively, “Ungerman”); and (ii) Paletta International Corporation and 810277 Ontario Inc. (collectively, “Paletta”), the owners of the lands municipally known as 99 and 109 Ryding Avenue, respectively (collectively, the “Ungerman/Paletta Lands”).

The Ungerman/Paletta Lands represent the largest landholding within the area that is subject to the City’s Ryding Lands Study (the “Study”) and, accordingly, Ungerman and Paletta are key stakeholders in the Study process. Likewise, Ungerman and Paletta have actively participated in the Study thus far, with representatives having attended both public meetings and two separate landowner meetings with City staff.

At the same time, we are aware that the owner of 116-142 Ryding Avenue, Urros Investments Inc., has submitted Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) applications to the City (Application No. 26 124085 WET 05 OZ), with the OPA application covering the lands that are subject to the Study, including the Ungerman/Paletta Lands. Ungerman/Paletta support the proposed OPA as an appropriate policy framework to guide future redevelopment of the lands subject to the Study. Thus, for the purposes of the Study, we encourage the City to adopt the policies proposed within the draft OPA.

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 April 29, 2026, a copy of which is attached.

We have subsequently reviewed the Directions Report of the Director, Strategic Initiatives, Policy and Analysis and the Director, Community Planning, Etobicoke York District, dated June 17, 2026 (the "Staff Report"), which is to be considered by Etobicoke York Community Council at its meeting on July 7, 2026, and includes a revised list of proposed "Ryding Lands Emerging Directions" at Attachment 8.

Comments on the Proposed Ryding Lands Emerging Directions, as Revised

We recognize that the proposed "Ryding Lands Emerging Directions" have been revised since the version that we responded to in our written submission dated April 29, 2026. In some instances, the revisions address, at least in part, concerns that we had identified with the previous version. However, Ungerman/Paletta continue to have concerns with some of the proposed emerging directions (as revised), as set out below.

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

As noted in our previous written submission to City staff, Ungerman/Paletta support 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. However, although this proposed direction asserts that this change is "best achieved through careful coordination and phasing", it is unclear what level of coordination and phasing is contemplated. In the absence of more specific details, we cannot confirm that such change is necessarily "best achieved" through these means.

Emerging Direction #5: Improve permeability with additional connections

Ungerman/Paletta would oppose a public street between Ryding Avenue and Ethel Avenue through the Ungerman/Paletta lands, nor has the need for a public street been identified. The potential for a publicly accessible connection between Ryding Avenue and Ethel Avenue, in the form of a laneway or mid-block connection subject to a public easement, might be considered in the context of a future redevelopment of the Ungerman/Paletta Lands, where details such as the nature of any such connection, its location and potential compensation to the landowner, could be discussed. To be clear, Ungerman/Paletta would not accept any publicly accessible connection through the Ungerman/Paletta Lands in their current condition, recognizing that the diagram provided by the City with this direction conceptually shows a north-south connection where a vacant industrial building currently exists.

Emerging Direction #7: Improve intersections to improve safety

In the previous version of the City's proposed emerging directions, there was specific reference to a recommendation that the intersection of Gourlay Crescent and Ryding Avenue be "improved from its current configuration to improve safety and priority for vulnerable road users". In response, we noted in our earlier written submission that we had not seen any safety and/or operational analysis of this intersection from the City and, accordingly, advised that the proposed direction was not appropriate and/or was premature. Alternatively, we noted that if the City had undertaken such analysis, we requested that we be provided with the complete documentation immediately. In the more than two months since we provided our written submission to City staff, we have not received any documentation regarding any safety and/or operational analysis of the intersection of Gourlay Crescent and Ryding Avenue.

Meanwhile, in the revised version of the proposed emerging directions, the specific reference to the intersection of Gourlay Crescent and Ryding Avenue has been removed, but the statement that existing intersections "should be improved from their current configurations to improve safety and priority for vulnerable road users" remains. Although intersection improvements to address safety can always be considered, we have not seen any documentation produced by the City to justify the conclusion that existing intersections within the Study area (which would include the intersection of Gourlay Crescent and Ryding Avenue) "should be improved", or what improvements might be contemplated. If any safety and/or operational analysis has been undertaken to support this recommendation, we reiterate our request that it be provided to us immediately. Further, Ungerman/Paletta would oppose any reconfiguration of the Gourlay Crescent / Ryding Avenue intersection that would shift the intersection east onto the Ungerman/Paletta Lands.

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

We acknowledge that the previously stipulated minimum amounts of non-residential uses within new development have been removed from this proposed emerging direction. However, in the absence of any supporting analysis, Ungerman/Paletta continue to have concerns with a policy that would require any minimum amount of space for non-residential uses to be included in new developments. Rather, consistent with the draft OPA submitted by Urros Investments Inc., we recommend that the direction be revised to encourage, but not mandate, non-residential uses in new developments within the Ryding Lands.

Emerging Direction #14: Encourage parkland provision to expand Runnymede Park

Under this proposed emerging direction, property owners are encouraged to coordinate parkland dedication and locate parkland adjacent to Runnymede Park, so that it serves to expand the existing park space and responds to any intersection reconfigurations. Although we recognize that this proposed direction would only “encourage” the above, as we noted in our earlier written submission, none of the properties within the Ryding Lands are “adjacent” to Runnymede Park. Further, if the reference to “any intersection configurations” is intended to refer to the intersection of Gourlay Crescent and Ryding Avenue, we reiterate our previous comments that we have not been provided with any documentation to support a potential reconfiguration of this intersection.

Emerging Direction #16: Built form should respond to transit proximity

Ungerman/Paletta support the recognition that a mix of both mid-rise and tall buildings would be permitted within the Ryding Lands, including on the Ungerman/Paletta Lands. However, with respect to the density and scale of such development, we do not believe that it is necessary and/or appropriate to stipulate that it should generally be lower than specific locations elsewhere within the surrounding area, particularly recognizing that there is an existing approval for building heights up to 34 storeys at 87 Ethel Avenue, on the south side of Ethel Avenue opposite the Ungerman/Paletta Lands. In our view, the scale of development may be informed by the existing and planned context of the surrounding area, but specific heights and densities of development should be determined through a subsequent zoning by-law amendment process.

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

As noted in our earlier written submission, although it may be appropriate to encourage a minimum percentage of dwelling units to be what is sometimes referred to as “family-size” units (i.e., units with 2 or 3 bedrooms), Ungerman/Paletta do not support the inclusion of a policy for the Ryding Lands that would mandate minimum percentages of such units, particularly where such minimums may not reflect market preferences and realities, and recognizing that smaller apartment units may be more intrinsically affordable.

Emerging Direction #22: Development should integrate green infrastructure

Although the City may seek to encourage more sustainable development through green infrastructure, any resulting policies must respect recent Provincial legislative/regulatory changes, some of which are reflected in the staff report entitled “Overview of Bill 98 Implications with Respect to Planning Matters” dated June 3, 2026, which was considered by the City’s Planning and Housing Committee at its meeting on June 11, 2026.

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

According to this proposed direction, “coordination between property owners is needed” in order to achieve “better community building outcomes”. However, as noted in our previous written submission, Ungerman/Paletta do not accept the assertion that coordination between property owners is necessarily needed to achieve better outcomes. Further, it is not realistic to expect that all of the property owners within the Ryding Lands would proceed with redevelopment at or around the same time, as evidenced by the fact that only one of the property owners has recently submitted a zoning by-law amendment application.

Closing

We thank the Community Council in advance for its consideration of this submission and request that direction be given to City staff to revise the proposed emerging directions to address the comments above. In that regard, we would be pleased to meet with City staff to discuss these comments.

Meanwhile, kindly ensure that we are provided with notice of any decision by Community Council and/or City Council regarding this item and that we receive notice of any future public meeting(s) regarding the City’s Ryding Lands Study.

Yours truly,
DAVIES HOWE LLP



Mark R. Flowers
Professional Corporation

encl.

copy: Jessica Krushnisky, Senior Planner, Strategic Initiatives, City Planning
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April 29, 2026

By E-Mail to *RydingLands@toronto.ca*

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

Dear Ms. Krushnisky:

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

We are counsel to: (i) Irving Ungerman Limited, Karl Ungerman Limited, Shar Tem Holdings Limited, St. Clair Poultry Packers Co. Limited and Stork Wasser Realty Limited (collectively, “Ungerman”); and (ii) Paletta International Corporation and 810277 Ontario Inc. (collectively, “Paletta”), the owners of the lands municipally known as 99 and 109 Ryding Avenue, respectively (collectively, the “Ungerman/Paletta Lands”).

The Ungerman/Paletta Lands represent the largest landholding within the area that is subject to the City’s Ryding Lands Study (the “Study”) and, accordingly, Ungerman and Paletta are key stakeholders in the Study process. Likewise, Ungerman and Paletta have actively participated in the Study thus far, with representatives having attended both public meetings and two separate landowner meetings with City staff.

At the same time, we are aware that the owner of 116-142 Ryding Avenue, Urros Investments Inc., has recently submitted Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) applications to the City (Application No. 26 124085 WET 05 OZ), with the OPA application covering the lands that are subject to the Study, including the Ungerman/Paletta Lands. Ungerman/Paletta support the proposed OPA as an appropriate policy framework to guide future redevelopment of the lands subject to the Study. Thus, for the purposes of the Study, we encourage the City to adopt the policies proposed within the draft OPA.

In the meantime, we are responding to the City’s invitation for stakeholders to provide comments on the City’s “Emerging Directions”, as presented at the April 15, 2026 public meeting. Accordingly, please find below the response of Ungerman/Paletta to the City’s proposed “Emerging Directions” that are of particular interest.

Response to the City's Emerging Directions

Emerging Direction #1. General category: Intent

Ungerman/Paletta support 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. Although this proposed direction asserts that this change is “best achieved through careful coordination and phasing”, it is unclear what level of coordination and phasing is contemplated. In the absence of more specific details, we cannot confirm that such change is necessarily “best achieved” through these means.

Emerging Direction #5. General category: Streets and Blocks

Ungerman/Paletta would not support a public street between Ryding Avenue and Ethel Avenue through the Ungerman/Paletta lands, nor has the need for a public street been identified. The potential for a publicly accessible connection between Ryding Avenue and Ethel Avenue, in the form of a laneway or walkway subject to a public easement, might be considered in the context of a future redevelopment of the Ungerman/Paletta Lands, where details such as the nature of any such connection, its location and potential compensation to the landowner, could be discussed. To be clear, Ungerman/Paletta would not accept any publicly accessible connection through the Ungerman/Paletta Lands in their current condition, recognizing that the diagram provided by the City with this direction conceptually shows a north-south connection where a vacant industrial building currently exists.

Emerging Direction #7. General category: Streets and Blocks

The City asserts in this proposed emerging direction that the intersection of Gourlay Crescent and Ryding Avenue “should be improved from its current configuration to improve safety and priority for vulnerable road users”. However, we have not seen any safety and/or operational analysis of this intersection from the City and, accordingly, Ungerman/Paletta are of the view that this proposed direction is not appropriate and/or is premature. Alternatively, if the City has undertaken such analysis, we request that we be provided with the complete documentation immediately.

Emerging Direction #8. General category: Streets and Blocks

In principle, Ungerman/Paletta accept that active connections, including walking and cycling connections, will be developed within the Ryding Lands as part of the future redevelopment of this area. However, with respect to the potential for a publicly accessible connection through the Ungerman/Paletta Lands, please see our comments above in response to Emerging Direction #5.

Emerging Direction #9. General category: Land Use

Ungerman/Paletta support permissions for a wide range of residential and non-residential uses on the Ryding Lands, provided that any permitted non-residential uses are compatible with residential and other sensitive land uses. However, they do not support the City's stipulation that new development will be required to include a specified minimum amount of space for non-residential uses – identified as the lesser of an amount equivalent to 1.0 times the site area or 15 percent of the building space. Indeed, we are not aware of any supporting market analysis for these specified minimum amounts of non-residential space. According to comments recently made by City Planning staff, an Economic Development study of the Ryding Lands is currently being undertaken by the City, but is not yet complete (this seems to be confirmed by virtue of Emerging Direction #21). If the City has any market analysis supporting these proposed minimum amounts of non-residential uses, we request that such documentation be provided immediately.

Meanwhile, the City has received a Market and Economic Assessment prepared by Parcel Economics Inc., dated January 27, 2026, in support of the OPA/ZBA applications, which concludes that developing non-residential uses on the Ryding Lands will be difficult for a number of reasons. As the City is well aware, there is already a significant amount of existing commercial/retail space in the broader Keele-St. Clair area. Further, although the Ryding Lands are in close proximity to various mixed-use arterial mainstreets, such as St. Clair Avenue West, Weston Road and Keele Street, as well as existing and planned public transit, the Ryding Lands do not have either frontage on or visibility from any of these major corridors. Thus, although there may be some opportunity for a modest amount of non-residential uses on the Ryding Lands, and a wide range of compatible non-residential uses should be permitted, Ungerman/Paletta are of the view that the Ryding Lands should be viewed as having the potential to contribute a significant amount of additional residential units to achieving and maintaining a “complete community” within the broader area and to support both the existing and future commercial enterprises in the surrounding area and the public investment in infrastructure, including public transit.

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 road allowance, recognizing the desire to transform the Ryding Lands with higher-intensity urban built forms. In this regard, built form flexibility should be maintained and specific details regarding building setbacks should be left to the zoning by-law amendment stage.

Emerging Direction #12. General category: Public Realm

Although the City may encourage landowners to work together to contribute to a larger park, we do not accept the City's assertion in this proposed direction that property owners

within the Ryding Lands may be “required” to work together. Further, it is not realistic to expect that all of the property owners within the Ryding Lands would proceed with redevelopment at or around the same time, as evidenced by the fact that only one of the property owners has recently submitted a zoning by-law amendment application.

Emerging Direction #13. General category: Public Realm

This proposed direction encourages property owners to locate new park space “adjacent to Runnymede Park”. However, it is noted that none of the properties within the Ryding Lands are adjacent to Runnymede Park. Further, this proposed direction refers to the “reconfiguration of the Ryding Avenue and Gourlay Crescent intersection”, as though it is a foregone conclusion. As noted above, we are not aware of any technical analysis undertaken by the City to support a reconfiguration of this intersection, and certainly not as shown in concept plans that have been prepared by the City and are discussed in more detail below.

Emerging Direction #14. General category: Public Realm

Ungerman/Paletta do not support the proposed direction that new buildings be required to be set back at least 5 metres from any park. As noted above, building setbacks, including any required setbacks from a park, should be determined at the zoning by-law amendment stage, having regard to any site-specific conditions. Moreover, we are aware of numerous instances elsewhere in the City where building setbacks to parkland of less than 5 metres exist or have been accepted. If the stated purpose of such minimum setback is to allow the buildings to be “accessed and maintained” without going into the park, it is our view that this would not generally require a 5 metre setback.

Emerging Direction #15. General category: Buildings / Built Form

Ungerman/Paletta support the permission for a mix of mid-rise and tall buildings within the Ryding Lands and, more specifically, on the Ungerman/Paletta Lands. However, they do not accept the inference that tall buildings should necessarily be at a height of less than 35 storeys. First, we do not accept that a maximum height of 35 storeys at the planned St. Clair-Old Weston Station is the appropriate benchmark against which heights should generally transition down. Second, we note that there is existing approval for building heights up to 34 storeys at 87 Ethel Avenue, on the south side of Ethel Avenue opposite the Ungerman/Paletta Lands, and therefore slightly further from the area surrounding the intersection of St. Clair Avenue West and Weston Road / Keele Street. Although 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.

Emerging Direction #18. General category: Housing

Although it may be appropriate to encourage a minimum percentage of dwelling units to be of what is sometimes referred to a “family-size” units (*i.e.*, units with 2 or 3 bedrooms), Ungerman/Paletta do not support the inclusion of a policy for the Ryding Lands that would mandate minimum percentages of such units, particularly where such minimums may not reflect market preferences and realities, and recognizing that smaller apartment units may be more intrinsically affordable.

Emerging Directions #19 - #23

These potential emerging directions are stated to be dependent on work that is apparently being undertaken by the City and is not yet complete and/or is subject to future events/analyses. Consequently, we will reserve the right to comment on these potential emerging directions in the future, when more details may be available. However, with respect to Emerging Direction #23, in the absence of any supporting analysis and documentation, and similar to our comments in response to Emerging Direction #1 above, we do not accept the assertion that “coordination between property owners is needed”.

Response to the City’s Demonstration Plans

Although not formally part of the City’s “Emerging Directions” handout, the City included “Demonstration Plans” in its presentation materials for the April 15, 2026 public meeting, which it identified as representing an “opportunity to ‘test’ the emerging directions”.

Although we acknowledge that the City clarified that the demonstration plans (*i.e.*, Concepts 1 and 2) were simply “examples” of how the Ryding Lands may redevelop in the future and not intended to illustrate how such redevelopment would necessarily occur, Ungerman/Paletta have significant concerns with the substance of each of the Concept Plans that were presented and also have concerns that presenting such concept plans to the public may establish certain expectations going forward. Indeed, City staff have invited members of the public to identify whether they “prefer one of the two concepts”. Thus, we request that the City refrain from presenting “demonstration plans” and/or “concept plans” for the Ryding Lands, and specifically for the Ungerman/Paletta Lands, going forward.

Among other things, both Concept Plans show a realigned Gourlay Crescent that creates a “T-intersection” with Ryding Avenue and, notably, places a large portion of the realigned road through the northwest portion of the Ungerman/Paletta Lands, which is not acceptable. As noted in our response to Emerging Direction #7 above, we are not aware of any analysis that demonstrates that the existing intersection of Gourlay Crescent and Ryding Avenue needs to be reconfigured for safety and/or other operational reasons. Moreover, even if it is demonstrated that the existing intersection needs to be reconfigured, there is no evidence that the City has tested a full range of alternatives and

it is unclear why a realignment is shown on the Ungerman/Paletta Lands, particularly when the lands west of Gourlay Crescent are already owned by the City. If the existing intersection is to be reconfigured and Gourlay Crescent realigned, the City should consider options that use the current City-owned lands to accommodate these changes.

In addition, Concept 1 shows only non-residential buildings on the southern half of the Ungerman/Paletta Lands, along the north side of Ethel Avenue. For reasons already stated, from a market perspective it is not realistic nor appropriate to think that only non-residential buildings would occupy a large portion of the Ungerman/Paletta Lands in a redevelopment scenario. Further, the City has already received land use compatibility and mitigation studies from the landowners within the Ryding Lands, and residential uses are already permitted on the south side of Ethel Avenue – thus, it cannot be said that the City does not yet know whether residential uses can be properly accommodated on the north side of Ethel Avenue in relation to the rail corridor to the south.

Moreover, the City's presentation slides indicate that Concept 1 assumes that property owners develop their lands independently whereas Concept 2 assumes that property owners work together to develop the lands comprehensively and, at the same time, the slides indicate that Concept 1 is "lower density" and Concept 2 is "higher density". If the intended inference is that higher densities will be supported only if property owners within the Ryding Lands work together to develop the lands comprehensively, Ungerman/Paletta reject that inference. Indeed, at this stage, there is no basis upon which to suggest that the heights and/or densities of future redevelopment within the Ryding Lands either should or would be lower if property owners proceed with future redevelopment independently.

We also note that for Concept 2 the City's presentation materials indicate that there is "opportunity for a larger, consolidated park resulting from coordination and agreement among property owners", and the slides show a potential consolidated park as an easterly extension of Runnymede Park, with a large portion of the potential park extension shown on what is currently the westerly portion of the Ungerman/Paletta Lands, which is not acceptable. Further, the balance of this potential "larger, consolidated park" is on existing City land, currently forming a large portion of the Gourlay Crescent road allowance. Although it is unclear how the City would propose to implement such a scenario, it is evident from the drawings that in order to achieve this result it would necessitate the City shifting its road allowance onto what is currently private property (*i.e.*, the westerly portion of the Ungerman/Paletta Lands), in order to expand its own existing park, which is also unacceptable.

Closing

We look forward to seeing how our comments on the City's proposed emerging directions for the Ryding Lands are implemented into the refined emerging directions that we understand are expected to be presented to Etobicoke York Community Council on July

7, 2026 and to City Council at its meeting currently scheduled for July 29-31, 2026. We also look forward to receiving any supporting analysis that the City may have for the emerging directions that we have identified above. In the meantime, please do not hesitate to contact us if you have any questions regarding our comments.

Yours truly,
DAVIES HOWE LLP



Mark R. Flowers
Professional Corporation

copy: Clients