

April 28, 2026

North York Community Council
c/o Matthew Green
Toronto City Hall
100 Queen Street West
Toronto, M5H 2N2

Delivered by email to nycc@toronto.ca

Dear Members of Community Council,

**Re: *Proposed Official Plan Amendment - Wynford-Concorde Focused Area Study
File No. 21 213197 NPS 00 TM
39 Wynford Drive – 39 Wynford Inc.***

We are the planning consultants for 39 Wynford Inc. (“the owner”) with respect to their lands at 39 Wynford Drive (the “subject site”) which is located at the southeast corner of Wynford Drive and Gervais Drive, within the Wynford-Concorde Focused Area Study boundaries.

On behalf of the owner, this letter provides commentary on, and requested revisions to, the proposed Official Plan Amendment No. 902, prepared through the Wynford–Concorde Focused Area Study (the “Area Study”). While we generally support and appreciate the overall direction of the Area Study that promotes a well-connected, transit-supportive, and complete community, we have a few comments and recommended revisions with respect to the draft policies related to the public realm, pedestrian connections, building setbacks, and multi-modal hubs.

Accordingly, on behalf of the owner, we respectfully request that Council either adopt the recommended policy revisions outlined below or, in the alternative, defer adoption of the Official Plan Amendment to a future date to allow the comments identified below to be addressed through continued discussions with City staff.

Participation in the Wynford-Concorde Area Study Processes

As noted above, the subject site is located within the boundaries of the Wynford–Concorde Focused Area Study. On behalf of 39 Wynford Inc., an Official Plan Amendment application (the “OPA Application”) was submitted on April 24, 2026, to redesignate the subject site from *Regeneration Areas* to *Mixed Use Areas* and introduce a site and area specific policy to facilitate the future redevelopment of the subject site with a mix of uses

and building forms, as well as plan for a new public street and public park. The OPA Application is currently under review by City staff.

The subject site, along with the adjacent property at 15 Gervais Drive, is currently subject to Site and Area Specific Policy 828 (SASP 828) under the City's Official Plan. SASP 828 establishes the requirement for a *Regeneration Areas* Study to be completed. As a result, the City initiated the Don Mills Regeneration Area Study in 2025. The Don Mills Regeneration Area Study includes three parcels of land within the Wynford-Concorde Area including the subject site, 15 Gervais Drive, and 1200 Eglinton Avenue East, that are together referred to as the Wynford Gervais Site. The properties within the Wynford Gervais Site are owned by three separate landowners who have been working collaboratively for a number of years to put forward a coordinated design for these lands that addresses various provincial and municipal planning objectives. Although each landowner is working towards (or has already submitted) a separate development application, the proposed plans for each property have been coordinated to provide for a comprehensive master planning approach with respect to roads, parks, public realm and built form.

On behalf of the owner, we have been actively participating in the Don Mills Regeneration Area Study process and have submitted a comment letter (dated October 24, 2025) to City staff regarding the draft Structure Plan shared at a landowner meeting on October 15, 2025. Similarly, we submitted a second comment letter to City staff (dated March 20, 2026) providing commentary and recommended revisions on the draft proposed policies prepared through the Don Mills Regeneration Area Study and released in February 2026.

Further, on September 23, 2025, plans were submitted to the City in support of pre-application consultation ("PAC") meetings for the properties comprising the Wynford Gervais Site. The PAC plans were coordinated between the three landowners and illustrate a coordinated approach with respect to the street network and public realm network.

In this context, the proposed Official Plan Amendment prepared through the Wynford-Concorde Focused Area Study represents a further refinement of the planning framework for the subject site and the wider Wynford-Concorde area. Accordingly, the comments provided herein are intended to continue our efforts to align emerging policy directions with the conceptual redevelopment for the subject site.

Comments on the Official Plan Amendment

The following is a summary of our comments on the proposed Official Plan Amendment:

a) Public Realm (iii)

Draft Policy (a)(iii) seeks to improve the pedestrian experience along Wynford Drive, Concorde Place, Wynford Heights Crescent, and Gervais Drive through measures such as wider sidewalks, tree planting, seating, and enhanced landscaping within the public and private realms. While we support the overall intent of this policy to enhance the public realm, we request that the policy be revised to include more consistent language that would provide greater flexibility and allow the intended public realm objectives to be achieved in other ways as well beyond those explicitly listed. Specifically, we request the following modifications:

- iii. The pedestrian experience along Wynford Drive, Concorde Place, Wynford Heights Crescent, and Gervais Drive will be improved by encouraging widening sidewalks, providing benches and seating and planting trees in the private and public realm. New developments will be encouraged to provide, among other things, wider sidewalks and green boulevards with additional tree planting where space permits, enhanced landscaping using native plant species, enhanced lighting and seating, consistent paving, setbacks and furnishings, to enhance the area's identity.*

b) Pedestrian Connections (i)

Draft Policy (b)(i) states that pedestrian amenities in the area will be enhanced through new linkages, and that new development will be encouraged to explore opportunities to provide privately-owned publicly accessible open spaces (POPS), including mid-block connections, in a manner that complements adjacent public spaces and streets. Although we generally support the intent of enhancing pedestrian amenities, we request that the policy be revised to clarify that the location of mid-block connections, as illustrated on Maps 2 and 3, is conceptual in nature and will be determined through the review of individual development applications. Specifically, we request the following modification:

- i. The pedestrian amenity of the area will be enhanced through linkages that connect both public and private open spaces. New development will be encouraged to examine opportunities to provide privately-owned publicly accessible open spaces (POPS), including potential mid-block connections as conceptually shown on Maps 2 and 3, in a manner that continues and complements adjacent public spaces and streets, to create plazas and additional spaces for community activities, as well as enhancing the pedestrian experience on the streets.*

c) Building Setbacks (i)

Draft Policy (c)(i) states that new buildings will establish a strong relationship with adjacent public streets and open spaces and further states that ground floor uses will be oriented toward the street to animate the public realm through active, street-related uses. In contrast, draft policy (c)(ii) states that buildings should be generously set back from the

front property line to allow for enhanced pedestrian zones (amongst other things), while clarifying in sub-policy (b) that a “main street” approach is encouraged for Wynford Drive (between Don Mills Road and the Don Valley Parkway).

In our opinion, there is a policy conflict between the directions for buildings to be generously set back from the front lot line and the direction for a “main street” approach along the portion of Wynford Drive abutting the subject site, which is inconsistent with the existing character of Wynford Drive, where buildings are currently generously set back.

If the OPA is not sent back to Staff for further review, we recommend that the policy be simplified by removing the language that new buildings should be “generously setback from the front property line” to maintain consistency with policy (c)(i) that envisions “active, street-related uses”, and policy (c)(ii)(b) that recognizes that a “main street” approach along this strip of Wynford Drive will be encouraged. Specifically, we would recommend the following modification to (c)(ii) so that the two policies read:

- i. New buildings will establish a strong relationship with adjacent public streets and open spaces. The ground floor of new buildings will have active, street related uses that animate the public realm and provide opportunities for casual overlook to the public realm.*
- ii. Buildings ~~will be encouraged to support~~ ~~should be generously setback from the front property line to allow for~~ enhanced pedestrian zones, ~~to~~ preserve mature trees, and ~~to~~ maintain the landscape character of the area.*
 - a. To recognize and maintain the landscape character of the existing tower-in-the park residential buildings located in the area east of the Don Valley Parkway, landscaped front yard setbacks and publicly accessible open spaces will be encouraged for new residential development.*
 - b. Recognizing the non-residential context of the area between Don Mills Road and the Don Valley Parkway, a “main street” approach along Wynford Drive with commercial, retail uses, and/or community uses, and active uses at grade will be encouraged.*

j) Multi Modal Hubs (i)

Draft Policy (j)(i) provides that development will include multi-modal hubs incorporating a mix of elements such as bike-share stations, car-share spaces, and ride-hailing points. While we support the intent of the policy to incorporate multi-modal hub elements within development, the policy currently reads as though the elements listed will be provided in developments where multi-modal hubs are identified, and implies that multiple elements may be required, rather than potentially just one element, if appropriate. We request that

the policy be revised to encourage the provision of such elements, and to remove the reference to “a mix of” to allow for more flexibility in the number of elements to be provided. Specifically, we request the following modifications:

- i. *Development will **be encouraged to** incorporate multi-modal hubs that include ~~a mix of~~ elements such as bike-share stations, carshare spaces, and ride share hailing points. Locations for multi-modal shared mobility hubs are conceptually shown on Map 3. The exact locations, appropriate concentration and mix of multi-modal elements will be determined and secured through the development review process.*

We appreciate your consideration. Should you require any additional information, please do not hesitate to contact Anna Wynveen, Senior Associate of our office, or the undersigned.

Yours very truly,
Bousfields Inc.



Mike Dror, MCIP, RPP

cc: *Marian Prejel & Dan Tovey, Community Planning
39 Wynford Inc.*