



May 20, 2026

North York Community Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attn: Matthew Green

Dear Chair and Members of North York Community Council,

***Re: Item NY33.3 – City-initiated Official Plan Amendments for the Don Mills
Regeneration Area Study
Proposed New SASP 828 for the Wynford-Gervais Site***

We are the planning consultants for 15 Gervais Drive Limited (“Resident”), the registered owners of the lands municipally known as 15 Gervais Drive (the “subject site”). The subject site is located at the northeast corner of Eglinton Avenue East and Gervais Drive.

On behalf of Resident, we respectfully provide the following comments on proposed Official Plan Amendment 911 (“OPA 911”), including the proposed new Site and Area Specific Policy 828 (“SASP 828”), prepared through the City-initiated Don Mills Regeneration Area Study.

The Don Mills Regeneration Area Study was initiated in 2025 and undertaken by the City to satisfy the requirement for the completion of a local area study. The proposed new SASP 828 policies, as set out in Appendix B of proposed OPA 911, are intended to replace the current policies of SASP 828, as approved by the Minister of Municipal Affairs and Housing on January 27, 2025.

Background

SASP 828, as proposed to be amended by OPA 911, includes the subject site and adjacent properties at 39 Wynford Drive and 1200 Eglinton Avenue East, which collectively comprise the “Wynford Gervais Site”. The Wynford Gervais Site is envisioned to be redeveloped to establish a transit-supportive, mixed-use complete community. The properties comprising 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 the lands to achieve a similar vision, which is reflected in site-specific applications that were recently filed with the City (see below).

On behalf of Resident, we have been actively participating in the Don Mills Regeneration Area Study process. In this regard, we attended a December 2025 Open House and submitted a comment letter (dated October 27, 2025) to City staff regarding draft Context and Structure Plans shared at an October 15, 2025 meeting. We submitted a second comment letter to City staff (dated March 20, 2026) providing commentary and recommended revisions on the draft proposed area-specific policies for the Wynford Gervais Site prepared through the Don Mills Regeneration Area Study and released in February 2026.

Most recently, on May 1, 2026, on behalf of Resident, we submitted a combined Official Plan Amendment (“OPA”) and Zoning By-law Amendment (“ZBA”) application to facilitate the redevelopment of the subject site. Consistent with proposed OPA 911, the draft OPA submitted as part of Resident’s site-specific application proposes to redesignate the subject site from *Regeneration Areas* to *Mixed Use Areas*. The draft OPA also introduces a new (or updated) SASP which provides a planning framework to guide the redevelopment of the subject site, and includes policies related to land use, public realm, built form, mobility and parks, among other matters.

The draft OPA submitted as part of the site-specific application was developed in coordination with the adjacent landowners, who have submitted separate but coordinated OPA applications to provide for a collaborative approach for the future redevelopment of the Wynford Gervais Site. The draft OPAs submitted by each of the landowners propose coordinated SASPs based on the same Structure Plan which identifies a new street to connect to the existing street network and to support movement through the Wynford Gervais Site, and conceptual park locations to support a robust public realm. The proposed SASPs, while similar, also include policies that responded to site-specific attributes of each property.

The structure of the draft OPAs and coordinated SASPs, prepared for the site-specific applications, is generally reflective of the structure proposed through OPA 911, with language similar to the policy directives set out in OPA 911 where the landowners are aligned with the staff recommendations.

However, while we are supportive of the general vision and the proposed redesignation to *Mixed Use Areas* to enable the Wynford Gervais Site to emerge as a mixed-use, transit-oriented, complete community, there are policies within proposed SASP 828 that are problematic and inconsistent with the draft OPAs submitted as part of the site-specific applications and developed in coordination with the adjacent landowners.

Thus, we highlight the following general areas of inconsistency and concern with proposed OPA 911 and new SASP 828, and we encourage the City to instead adopt the policies proposed within the site-specific draft OPAs:

- With respect to the Wynford Gervais Structure Plan (Map 2), the location of the “New Street” and “Conceptual Park Area” in proposed OPA 911 differ from the plans submitted as part of the site-specific applications, which were coordinated between the landowners of the Wynford Gervais Site and their consultants, and which represent appropriate land use planning and optimized transit-supportive development.
- The Land Use policies in proposed OPA 911 would require that non-residential uses be integrated on the site. Non-residential gross floor area across the entire SASP area would be required to comprise a minimum of 17,000 square metres or 8 percent of the total gross floor area, whichever is less. This was updated from the prior version, which required the “lesser of” 15 percent or 1.0 times the site area”. Despite this change, it continues to be our opinion that the non-residential requirement should be removed and the policies of the SASP should be flexible, given the current context of the office market.
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- We acknowledge the introduction of draft Policy 6, which provides some flexibility with respect to the location of parks. However, the proposed location of the central park is inconsistent with the Structure Plan prepared and coordinated as part of the site-specific applications;
- We recommend that the draft Community Services and Facilities policies reflect the Community Benefits Charge by-law provisions, as appropriate.
- While we are comfortable with affordable housing being encouraged, the policy framework should be consistent with provincial regulations and the City’s inclusionary zoning policies and by-law, and agreements securing affordable housing should not be required through SASP 828.

Conclusion

We appreciate the opportunity to comment on proposed OPA 911 and new SASP, prepared through the City-initiated Don Mills Regeneration Area Study.

It is our opinion that the draft OPAs and coordinated SASPs submitted as part of the site-specific applications appropriately achieve the vision of creating a transit-supportive, mixed use complete community on the Wynford Gervais Site, which is

supported by the establishment of a connected network of new local streets and mid-block connections, parks, an appropriate mix of residential and non-residential uses, diverse housing opportunities and a high quality public realm. We therefore encourage the City to instead adopt the policies proposed within the draft OPAs submitted as part of the site-specific applications.

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, Chris Sim or the undersigned.

Yours very truly,

Bousfields Inc.



Mike Bissett, MCIP, RPP

cc: *Ornella Richichi, Resident*
Nik Papapetrou, Resident