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May 22, 2026

North York Community Council
C/o The City Clerk
North York Civic Centre
5100 Yonge Street
Toronto, Ontario, M2N 5V7
Email: nycc@toronto.ca

**Re: NY33.3 - Don Mills Regeneration Areas Study – Final Report
Comments on behalf of 1123 Leslie Street**

1.0. Introduction and Background

We are the land use planners of the owners of 1123 Leslie Street, (the “subject site”). This correspondence provides our client’s comments and requests, is in response to the proposed policies for the Don Mills Regeneration Areas Study contained in the draft Official Plan Amendment 912. In the below table under Section 2.0 Policies Review, we outline our requested revisions and comments.

Our client generally supports the direction toward mixed-use, complete communities, yet they remain concerned about the proposed policies related to maximum density, built form, park, road patterns, and unit mix.

We acknowledge and appreciate the revisions made to the draft policies since the earlier version of the draft policies on March 5, 2026. As a result of these more recent changes, we have removed several of our previous comments, including those related to the minimum non-residential use requirement, with which we are now satisfied.

In view of our more detailed comments below, we suggest that approval of Official Plan Amendment 912 is premature, as there needs to be continued opportunity for consultation with City Staff regarding the revised policies that remain of concern. As such, we respectfully request that North York Community Council defer its decision of this matter, until the opportunity for further consultation with staff has taken place.

2.0 Policies Review

Map and/or Policy #	Policies	Comments and Requested Revisions
Map 2 – Structure Plan	Map 2 identifies a centrally located Conceptual Park Area and a New Street Pattern	The proposed road pattern on Map 2 of draft OPA 912 appears to be driven by the City’s desire to have a consolidated/single central park location. On behalf of our clients, we expressed the alternative of having a central east/west New Street extending from Leslie Street to the eastern end of the subject site, centred along the common

		<p>property line of 1123 Leslie Street (subject site), and 1121 Leslie Street (the property to the south). Under this arrangement, each property owner would contribute its share of public roadway and parkland on its own property, with the parkland contributions being on either side of this east/west New Street, resulting in two centrally located parks on each side of the east/west New Street. The park contribution on our client's site will be 10% of the development site which will result in a sizable park. This will address the parkland needs of the new development area, although in an alternate configuration.</p> <p>The public New Street pattern contemplated by Map 2 dissects the development block on our client's site, thereby introducing considerable inefficiencies in the development pattern on our clients site, reducing areas where buildings and housing could alternatively locate, and reducing areas where below grade parking can be constructed. This results in the likely need for additional levels of parking and few buildings, which adds considerable cost to the development.</p> <p>Consequently, our request is that Map 2 be revised so that the New Street and Conceptual Park Area locations and alignments, be revised to reflect our comment above. An example of how we'd suggest it be revised is attached to this letter.</p>
<p>Policy 6</p>	<p>New parkland will be planned and secured through the coordinated consolidation of parkland dedications from multiple developments and/or property owners, as applicable, to establish a centrally located park as identified conceptually on Map 2 – Structure Plan.</p>	<p>We request that the policy be revised by stating the following:</p> <p>“New parkland will be planned and secured through parkland dedications from multiple developments and/or property owners, as applicable, to establish centrally located parks, as identified conceptually on Map 2 – Urban Structure.”</p>
<p>Policy 23</p>	<p>The following community services and facilities will be prioritized to support development:</p> <p>c) one public (Toronto Catholic District School Board) Elementary School.</p>	<p>In the Final Staff Report dated May 7, 2026, it is noted that the request for an elementary school was identified by the Toronto District Catholic School Board, to be accommodated on <u>either</u> the Leslie Sites or the Wynford-Gervais Sites.</p> <p>The subject site is located at the western edge of the broader study area and would be an inferior school location to service the broader population. In our opinion, there may be other opportunities within the area, including areas/site outside the OPA 912 area, that could better accommodate a new elementary school in a location that is more central to the overall community.</p> <p>In addition, we note there is an existing TCDSB Elementary School - St. Bonaventure Elementary School, located at 1340 Leslie Street, approximately 1km north (approximately a 20 minute walk) from the subject site.</p> <p>Accordingly, we are not supportive of identifying or requiring a new elementary school on the subject site.</p>
<p>Policy 30</p>	<p>Within the SASP area, the highest development intensity</p>	<p>We request this policy be removed, as it may prejudice heights and scale on our client's site that are otherwise appropriate for the site. As drafted, the policy may factor in building heights</p>

	<p>will generally be located to the south to:</p> <p>a) generally locate the highest development intensity closer to the higher-order transit;</p> <p>b) avoid, minimize, and where this is not possible, mitigate shadow impacts on the <i>Natural Areas</i>; and</p> <p>c) provide an appropriate transition in scale to the heritage building.</p>	<p>approved years ago as a benchmark(s) for what may be appropriate height and scale today and in the future. It does not allow for site specific considerations or consider timing of developments. Heights should be determined in site specific development applications, based on the relevant factors and applicable Provincial and City policies at the time the Zoning By-law Amendment application is considered.</p> <p>The shadows that may fall onto the Natural Area should not be a determinant of height or scale of development. The heritage solution will be arrived at during the site specific Zoning By-law application. It is premature to judge the heritage solution and the scale and transition of buildings near the heritage building at the official plan level as a result.</p>
<p>Policy 31</p>	<p>The maximum permitted gross density is 3.0 Floor Space Index. New Development proposing greater densities may be considered without requiring an amendment to this SAPS, provided that the following is demonstrated to the satisfaction of the City:</p> <p>....</p>	<p>This policy should be deleted. As the vast majority of areas in Toronto determine appropriate scale based on good planning and urban design, we question why this warrants inclusion in this proposed SASP. Also imposing an artificial 'maximum' density would, in our opinion, lead to an under-utilization of a parcel within a Major Transit Station Area that is capable of accommodating more density. In any event, the enunciated maximum of 3.0 FSI is too low, lower than a mid-rise building and therefore would function to inappropriately diminish the scale of good development and additional housing units.</p>
<p>Policy 32</p>	<p>New buildings along the Leslie Street frontage should provide generous setbacks from the property line to maintain the existing landscape character and protect sightlines to the heritage building. In recognition of existing grading conditions along Leslie Street, building setbacks should be designed to respond to and integrate with the existing topography. Retaining structures will be minimized through the use of terraced landscape treatments, increased setbacks and enhanced landscape features, where appropriate.</p>	<p>This policy should be deleted or revised to enable additional flexibility to allow sufficient review with Heritage, Urban Forestry/Landscape, Urban Design, Community Planning, and Engineering through the development application review process on a site-specific basis. We anticipate there will be alteration of existing grades next to Leslie Street as a means to enhance the streetscape and public realm along Leslie Street.</p>
<p>Policy 35</p>	<p>Streetwalls will be designed to support a consistent pedestrian scale and sense of enclosure, providing:</p> <p>a) a streetwall height generally between 3 storeys and 80% of the adjacent street right-of-way width along all streets; and</p> <p>b) a streetwall height of generally 4 storeys where adjacent to parkland and/or POPS.</p>	<p>This policy should be reconsidered to enable higher streetwall heights along different street scales and other circumstance. For instance, Leslie Street is a wider ROW width and an arterial/Major Street when compared to the contemplated interior New Streets. Also, a greater scaled base building may be appropriately located adjacent to the north and east sides of the site.</p>

Policy 39	To achieve a mix of residential unit types and sizes, a minimum of 40 percent of new units in developments with more than 80 new residential units will have two or more bedrooms, including: a) a minimum of 15 percent of the total number of units as two-bedroom units; and b) a minimum of 10 percent of the total number of units as three or more bedroom units.	This policy is an increase in the requirement and standard set by other areas of the City, including the Downtown and Yonge-Eglinton Secondary Plan areas. We request the removal of the overall 40% requirement, to be replaced with the following, which is consistent with other areas of the City to allow the required flexibility in unit distribution: c) An additional 15 per cent of the total number of units will be a combination of 2-bedroom and 3-bedroom units, or units that can be converted to 2 and 3 bedroom units through the use of accessible or adaptable design measures.
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3.0 Conclusion

Thank you for allowing us to provide input into this process. While we generally support the direction toward mixed-use, complete communities and appreciate the revisions made to the policies since the release of the Draft Policies on March 5, 2026, we remain concerned with several important and key aspects of the proposed Official Plan Amendment, including the prescriptive approach to the parks and road pattern, the scale of density, and some of the other policy details embodied in the current draft of OPA 912. As a result, we believe that ongoing consultation could provide a better understanding of the landowners' perspectives, which may enable further revisions to draft OPA 912.

Accordingly, we respectfully request that consideration of this matter be deferred until further consultation has taken place with the landowners of 1123 and 1121 Leslie Street.

Please do not hesitate to contact the undesignated at ext. 2100 or Michelle Tiger at ext. 2102.

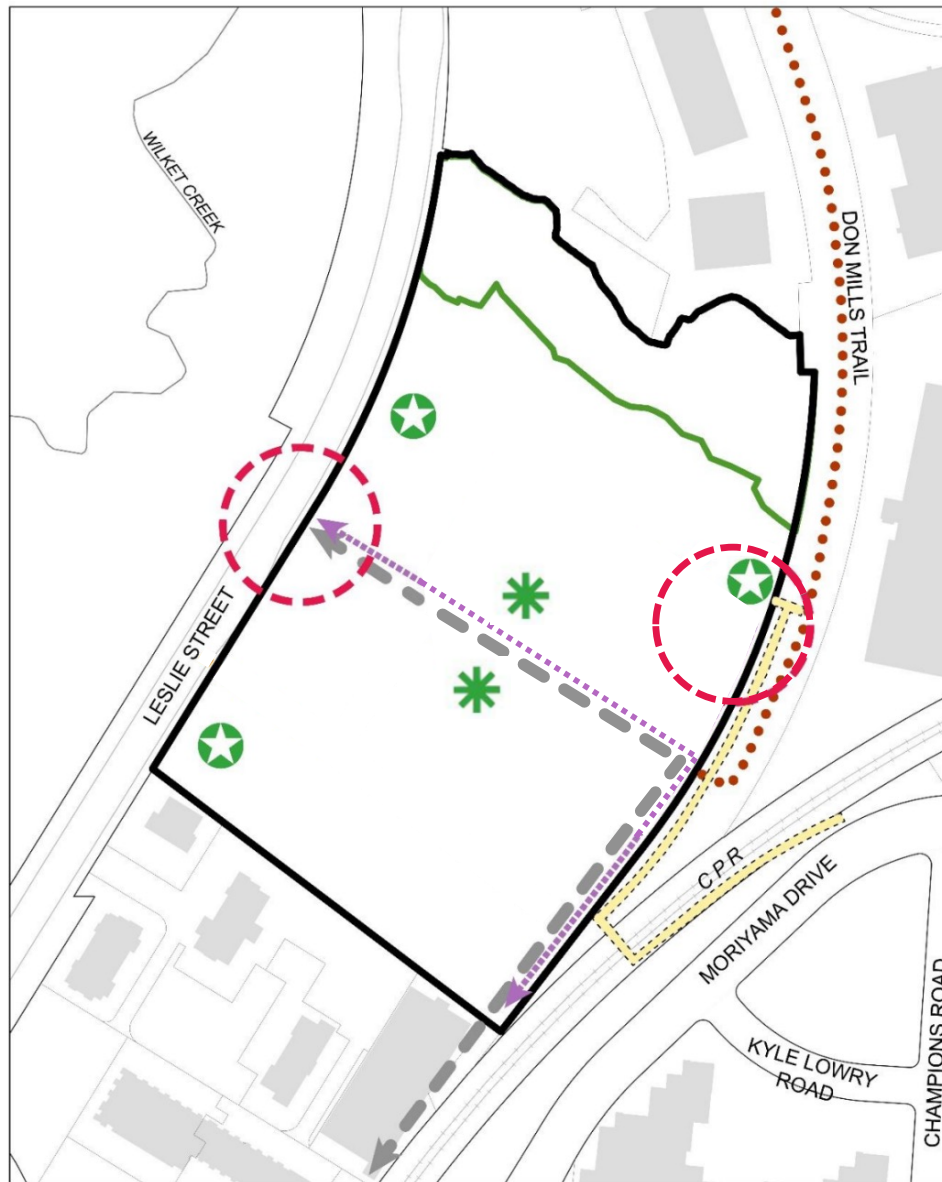
Yours very truly,
GOLDBERG GROUP



Michael S. Goldberg, MCIP, RPP
Principal

Cc: Byron Lee - byron.lee@grouplandmark.ca
Hon. Peter Van Loan - Pvanloan@airdberlis.com

Attachment 1 – Alternative Map 2 – Structure Plan



Leslie Structure Plan

1121 Leslie Street and 1123 Leslie Street

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|--------------------------|---------------------------------|
| Site | Don Mills Crossing Bridge |
| New Streets | Don Mills Trail |
| Natural Areas Boundary | Potential Mid-Block Connections |
| Conceptual Park Area | Bikeways |
| Potential POPS Locations | Multi-Modal Shared Mobility Hub |



Map 2 – Structure Plan