



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

May 25, 2026

GWD File: 1878.00

**North York Community Council  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2**

**Attention: Matthew Green, Administrator, North York Community Council  
([nycc@toronto.ca](mailto:nycc@toronto.ca))**

**Subject: Public Input Letter of Concern – Request to Defer Item  
Item NY33.3: May 26, 2026, North York Community Council Meeting;  
Don Mills Regeneration Area Study - Final Report;  
1200 Eglinton Avenue East, City of Toronto  
Amexon Property Management Corp.**

**Dear Chair and Members of North York Community Council:**

Gagnon Walker Domes Ltd. (“GWD”) represents Amexon Property Management Corp. (“Amexon”), the owner of the vacant 0.84 hectare (2.07 acres) property located at 1200 Eglinton Avenue East, in the City of Toronto (the “subject site” or “Amexon site”). The subject site has direct frontage along Eglinton Avenue East and abuts the Aga Khan Park & Museum Station along the Eglinton Crosstown LRT (Line 5).

The City’s Don Mills Regeneration Areas Study (“Don Mills Study”) was initiated in 2025, in part, to satisfy the requirement for the completion of a local area study for the lands municipally known as 1200 Eglinton Avenue East, 39 Wynford Drive, and 15 Gervais Drive (collectively referred to in the Don Mills Study as the “Wynford-Gervais Site”); as directed by Site and Area Specific Policy (“SASP”) 898 and SASP 828.

The Don Mills Regeneration Study Final Report (“Final Report”) recommends approval of proposed Official Plan Amendment (“OPA”) 911, including proposed new SASP 828 policies, which are intended by City staff to guide the comprehensive mixed-use redevelopment of the three (3) properties comprising the Wynford-Gervais Site.

### **Amexon Does Not Support Staff Recommendations**

Amexon has reviewed the Final Report that is scheduled to be considered by North York Community Council on May 26, 2026. While Amexon is supportive of the general intent to facilitate mixed use, transit-supportive redevelopment of the subject site and Wynford-Gervais Site as a whole, Amexon has significant concerns with OPA 911.

On behalf of Amexon, GWD has actively participated in the Don Mills Study. This has included attendance at Open House Meetings hosted by City Staff on September 11,

---

**GAGNON WALKER DOMES LTD.**

7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W0B4 • P: 905-796-5790  
www.gwdplanners.com • Toll Free: 1-855-771-7266



2025, December 2, 2025, and March 5, 2026, a City-Landowner Meeting held on October 15, 2025, as well as the submission of written correspondence dated October 28, 2025 (*attached*) identifying Amexon's comments and concerns with the City's high-level structure plan and general policy directives of the on-going Don Mills Study. Following City staff's initial circulation of their proposed draft policies for OPA 911 on February 27, 2026, GWD submitted a second letter to City staff dated March 24, 2026 (*attached*) identifying Amexon's comments and concerns with the initial proposed policies and Maps as they pertained to the Wynford-Gervais Site.

Notwithstanding Amexon's participation and input into the Don Mills Study as one of the three (3) landowners directly impacted by the proposed amendment, OPA 911 and the corresponding revised SASP 828 do not address Amexon's previously identified concerns. For this reason and as further outlined below, Amexon requests that North York Community Council not adopt the Staff recommendations identified in the Final Report and instead refer the matter back to Community Planning staff with the direction that staff conduct additional meaningful consultation with the landowners of the Wynford-Gervais Site, including Amexon, to address outstanding concerns with OPA 911, as currently drafted.

## **Background**

### *Amexon's Previous Employment Area Conversion*

The subject site was previously located within an 'Employment District' and designated 'General Employment Areas' in the City of Toronto Official Plan. In October 2024, through settlement of Amexon's Ontario Land Tribunal appeal of City of Toronto OPA 231. The settlement resulted in the subject site being removed from 'Employment District' and redesignated to 'Regeneration Areas' in the City's Official Plan.

Amexon's settlement of OPA 231 also introduced SASP 898 to Chapter 7 of the Official Plan. SASP 898 only applies to the subject site. SASP 898 provides guidance on the preparation of a local area study being conducted leading to the creation of a new Site and Area Specific Policy, or Secondary Plan to govern the ultimate development of the subject site for mixed use development.

Through a separate process, OPA 653 (approved by the Minister of Municipal Affairs and Housing on January 27, 2025) introduced SASP 828, which only applies to 39 Wynford Drive and 15 Gervais Drive; being the other two (2) properties comprising the Wynford-Gervais Site.

SASP 898 and SASP 828 contain similar policies.

### *Amexon's Official Plan and Zoning By-law Amendment Application*

Amexon is advancing a site specific Official Plan and Zoning By-law Amendment application that proposes mixed use development on the subject site. Amexon's Amendment Application has been coordinated with the abutting landowners located at 15 Gervais Drive and 39 Wynford Drive. These three (3) separate landowners, which make



up the whole of the Wynford-Gervais Site, have been working collaboratively for a number of years to put forward a coordinated design for the three (3) properties located at the northeast quadrant of Eglinton Avenue East and Gervais Drive, which address various provincial and municipal planning objectives. The initial Pre-Application Consultation Meetings between the City and the three (3) landowners were held in October 2025.

Although each landowner within the Wynford-Gervais Site is advancing its own separate development application(s), the proposed development plans for each property have been extensively coordinated to provide for a comprehensive master planning approach with respect to roads, parks, public realm and built form. Each of the three (3) landowners propose similar SASPs through their respective site-specific OPA Applications, including the same landowner Structure Plan.

While Amexon is aligned with OPA 911's proposed redesignation of the subject site to Mixed Use Areas, there are numerous policies proposed through OPA 911 that do not represent good planning and that are inconsistent with Amexon's site-specific development proposal and the master plan that has been coordinated with the other landowners of the Wynford-Gervais Site.

### **Summary of Concerns**

The following provides a general overview of Amexon's comments and concerns with OPA 911 and the new SASP 828 policies as it pertains to the Wynford-Gervais Site:

#### **Failure to Amend SASP 898**

As noted above, SASP 828 does not currently apply to the subject site. Instead, only SASP 898 applies. OPA 911 proposes that the policies of SASP 828 be replaced and that the boundary of SASP 828 be expanded to now also include the Amexon site. SASP 898 is proposed to remain without amendment.

As currently proposed, OPA 911 will overlap the amended SASP 828 policies onto the existing policies of SASP 898. The policies of SASP 898 (which generally establish an initial framework for the completion of the Don Mills Study) and the draft policies of SASP 828 (which are proposed new policies resultant of the City's Don Mills Study) directly conflict with one another. While the inclusion of draft Policy 2 to SASP 828 is intended to provide transition provisions, the overlapping remaining and proposed SASP policies results in a policy framework that becomes unclear for the Amexon site, serving as a potential barrier to its appropriate redevelopment.

OPA 911 should be amended to also propose the replacement of the policies of SASP 898, as appropriate, to ensure clarity.

#### **Structure Plan**

The location of the 'New Street', 'Conceptual Park Area', and 'Potential POPS Locations' on the draft Wynford Gervais Structure Plan (Map 2) differs from the coordinated master



plan submitted by Amexon and the abutting landowners in support of their site-specific applications.

The City's Structure Plan advanced through OPA 911 identifies a New Street through the Wynford-Gervais Site that connects with Gervais Drive and Wynford Drive. While it is acknowledged that the alignment of the New Street is intended to be conceptual, the proposed amendments within OPA 911 require that the New Street connects to Gervais Drive and to Wynford Drive. The master plan advanced by the landowners proposes a new public street that extends from Gervais Drive and terminates at a public park located on the Amexon lands, with no connection to Wynford Drive. The landowners' proposed public street alignment represents good planning as it facilitates appropriate access to development blocks, creates more appropriate development parcels, and facilitates the implementation of servicing infrastructure that is necessary to serve the development of the SASP area, while limiting the development of excessive public rights-of-way.

As expressed to staff on numerous occasions, Amexon also has concerns with the City's proposal for a single consolidated Conceptual Park Area located on the subject site and the 15 Gervais Drive lands. Amexon and the abutting landowners have never contemplated a single consolidated park, but rather a series of strategically placed park locations connected by a network of integrated potential privately owned, publicly accessible spaces ("POPS") and mid-block connections that achieve various public realm objectives and integrated block planning.

It has also been previously requested that the proposed Potential POPS Location that is conceptually identified on the subject site be relocated from being directly located along Eglinton Avenue East, to a location slightly further north. The relocation of the Potential POPS Location further north more accurately reflects the Amexon proposal, which appropriately places built form along Eglinton Avenue East (closest to the transit station) while achieving the City's overall objectives for POPS and maintaining opportunities for coordination with abutting private and public open spaces.

Amexon requests that Wynford Gervais Structure Plan contained within Map 2 be revised to identify the Future Street, Conceptual Park Areas, Potential POPS Locations and Mid-Block Connections consistent with Amexon's site specific proposal, which has been coordinated with the other landowners of the Wynford-Gervais Site. The Structure Plan proposed through OPA 911 does not appropriately recognize the locational and physical characteristics of the Wynford-Gervais Site and therefore OPA 911 does not represent good planning. Conversely, the Structure Plan advanced by the landowners of the Wynford-Gervais Site facilitates transit-supportive, mixed use development that is supported by a coordinated and appropriate network of streets, mid-block connections, POPS, parks, and built form that represents good planning.

### *Non-Residential Floor Area Requirements*

OPA 911 proposes that non-residential uses shall comprise the lesser of 17,000 m<sup>2</sup> or 8% of the total gross floor area across the entire SASP 828 area. It continues to be our opinion that the non-residential requirement should be removed to reflect the current



deteriorated non-residential market reality and that the subject site is vacant and provides no existing non-residential function. Alternatively, more flexible policy language should be considered.

### Community Services and Facilities

Draft Policies 16 to 22 speak to new and/or expanded community services and facilities. These policies should be amended to reflect the Community Benefits Charge By-law provisions. As part of future development, a Community Benefits Charge will be paid to support the creation of facilities and services to support complete communities.

### Built Form

Pursuant to the Minister of Municipal Affairs and Housing's approval of OPA 540, Chapter 8 of the Official Plan was amended to require the City to initiate an amendment to its Zoning By-law to permit a density of 8.0 FSI or more for lands within 200 metres of an existing or planned transit station. The Amexon site is located approximately 85 metres from the Aga Khan Park & Museum Station and accordingly it shall be developed for tall buildings. The draft policies of OPA 911 do not provide sufficient clarity on how appropriate transition in scale is intended to be achieved between new tall building development on the subject site and adjacent buildings and/or the abutting Aga Khan Park and Museum private open space, as identified in draft Policy 26.

In addition, the Built Form policies of OPA 911/ SASP 828 include numerical minimum development setbacks to streets and parks, as well as maximum podium heights along streets, parks, POPS, and mid-block connections. It is our opinion that the inclusion of numerical development standards in Official Plan policy is inappropriate and should instead be identified in zoning by-laws.

### Affordable Housing

While affordable housing is encouraged for the majority of the Wynford-Gervais Site, OPA 911 proposes to carry forward minimum affordable housing requirements that are only applicable to the Amexon site. We believe that OPA 911's inclusion of minimum affordable housing requirements for only the Amexon site is unfair and inappropriate. The direction provided by the Minister of Municipal Affairs and Housing in January 2025 as it pertains to the final approval of OPA 653/SASP 828, provides clear provincial direction for the removal of mandatory affordable housing requirements within the Wynford-Gervais Site. Therefore, Draft Policy 2, which directs minimum affordable housing requirements for the Amexon site, should be deleted.

### Implementation & Phasing

Draft Policy 44 requires that development proposals provide or secure any necessary municipal servicing infrastructure prior to development proceeding "and any zoning by-law amendment approval". It is not appropriate for OPA 911 to withhold zoning approval until the construction of municipal servicing improvements (or the posting of securities).



## **Final Statements**

As Amexon's outstanding concerns have not been addressed, we request that North York Community Council not adopt the Staff recommendations identified in the Final Report and instead refer the matter back to Community Planning staff with the direction that staff conduct additional meaningful consultation with Amexon to address their outstanding concerns with OPA 911.

**Regards,**

**Richard Domes**  
**Partner, Principal Planner**

C.C.: J. Azouri/A. Evans, Amexon Property Management Corp.  
C. Gibson/M. Flynn-Guglietti, McMillan LLP  
M. Gagnon, Gagnon Walker Domes Ltd.



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

March 24, 2026

GWD File: 1878.00

**City of Toronto - Strategic Initiatives, Policy & Analysis Section  
City of Toronto, Metro Hall  
55 John St., 22nd floor  
Toronto ON M5V 3C6**

**Attention: Jessica Krushnisky, Senior Planner ([Jessica.krushnisky@toronto.ca](mailto:Jessica.krushnisky@toronto.ca))**

**Subject: Landowner Comments  
Don Mills Regeneration Areas Study – Draft Site and Area Specific  
Policies  
1200 Eglinton Avenue East, City of Toronto  
Amexon Development Corporation**

Gagnon Walker Domes Ltd. (“GWD”) represents Amexon Development Corporation (“Amexon”), the owner of the vacant property located at 1200 Eglinton Avenue East, in the City of Toronto (the “subject site”). The subject site measures approximately 0.84 hectares (2.07 acres), with frontage of approximately 93 metres along Eglinton Avenue East. The subject site immediately abuts the Aga Khan Park & Museum Station.

The City’s Don Mills Regeneration Areas Study (“Don Mills Study”) is being undertaken, in part, to satisfy the requirement for the completion of a local area study towards the development of new Site and Area Specific Policy (“SASP”) for the Regeneration Areas lands municipally known as 39 Wynford Drive, 1200 Eglinton Avenue East, and 15 Gervais Drive; as directed by SASP 898 and SASP 828.

The purpose of this letter is to provide Amexon’s comments on the draft SASP policies/amendments advanced as part of the Don Mills Study (first released by the City on February 27, 2026) as it pertains to what the City has termed the “Wynford Gervais Site”. The Wynford Gervais Site includes the subject site, along with the properties municipally known as 39 Wynford Drive and 15 Gervais Drive.

As you are aware, the lands within the Wynford Gervais Site were subject to employment land conversions. SASP 898, which applies to the subject site, was introduced to Chapter 7 of the City’s Official Plan through resolution of Amexon’s Official Plan Amendment (“OPA”) 231 appeal. Through a separate process, OPA 653 introduced SASP 828, which applies to 39 Wynford Drive and 15 Gervais Drive. SASP 898 and SASP 828 contain similar policies.

The three (3) separate landowners have been working collaboratively for a number of years to put forward a coordinated design for the redevelopment of the three (3) properties comprising the Wynford Gervais Site that address various provincial and municipal planning objectives. Although each landowner is working towards submitting its own

---

**GAGNON WALKER DOMES LTD.**

7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W0B4 • P: 905-796-5790  
www.gwdplanners.com • Toll Free: 1-855-771-7266



separate development application(s), the proposed plans for each property have been extensively coordinated to provide for a comprehensive master planning approach with respect to roads, parks, public realm and built form – as has been illustrated through the landowners' Pre-Application Consultation ("PAC") submissions. Amexon's coordinated formal PAC application was submitted to the City on September 23, 2025 and the PAC meeting was held on October 30, 2025. At the PAC meeting a copy of the draft proposed master plan for the Wynford Gervais Site was provided to City staff.

The City has released draft amendments and proposed policies for the Wynford Gervais Site that are inconsistent with the landowners' coordinated master plan.

The following includes Amexon's comments and concerns with the draft proposed amendments and new SASP policy as it pertains to the Wynford Gervais Site:

### **Draft Amendments to the Parent Official Plan for Wynford Gervais Site**

At this time the City proposes amendments to the Official Plan which include the following:

- Adding to Schedule 2 - The Designation of Planned but Unbuilt Roads a new planned but unbuilt road ('New Link A' from Wynford Drive to Gervais Drive);
- Amending Map 20 - Land Use Plan to redesignate the three (3) properties located within the Wynford Gervais Site from 'Regeneration Areas' to 'Mixed Use Areas'; and
- Amending Map 31 - Site and Area Specific Policies by revising the boundaries of SASP 828 to include the subject site (merges SASP 898 into a new consolidated SASP 828).

While Amexon is supportive of the proposed redesignation of the subject site to Mixed Use Areas, it does not support the proposed connection of New Link A with Wynford Drive for the reasons outlined below. Amexon withholds its position on the proposed consolidation of SASP 828 and SASP 898 at this time and are seeking confirmation on whether it is the City's intent that the draft SASP policies would fully replace the existing policies of SASP 898.

### **Draft Map 1- Wynford Gervais Structure Plan**

The location of the 'Future Street', 'Conceptual Park Area', and 'Potential POPS Locations' on the draft Wynford Gervais Structure Plan (Map 1) differs from the coordinated master plan submitted to the City by Amexon and the abutting landowners in support of their PAC submissions.

While it is acknowledged that the alignment of the Future Street is intended to be conceptual, the proposed amendment to Schedule 2 – The Designation of Planned but Unbuilt Roads of the Official Plan (noted above) would not permit an alignment of the Future Street that does not connect to Wynford Drive. The master plan advanced by Amexon and the other abutting landowners proposes a new public street that extends from Gervais Drive and terminates at a public park located on the Amexon lands, with no



connection to Wynford Drive. The City's proposed alignment of the Future Street would limit access to the subject site and abutting lands at 15 Gervais Drive. Based on work undertaken by the transportation consultant retained by the landowners, a southerly private road connection from the proposed public street to Eglinton Avenue East would likely be required and would create regularly-shaped parcels with dimensions that facilitate appropriate density on the subject site, while also providing additional opportunities for access/egress. It is our opinion that the need for the north-south segment of the proposed Future Street to Wynford Drive is unnecessary and should be deleted.

Amexon also has concerns with the City's proposed location of the single, consolidated Conceptual Park Area that is proposed on the subject site and 15 Gervais Drive property (located south of the Future Street). The landowners have never contemplated a single consolidated park block but rather a series of strategically placed park locations connected by a network of integrated potential privately owned, publicly-accessible spaces ("POPS") and mid-block connections that achieve various public realm objectives and integrated block planning.

It is also requested that the City's proposed Potential POPS Location that is identified on the subject site be relocated from being directly located along Eglinton Avenue East, to a location slightly further north, closer to the northeast area of the subject site. The relocation of the Potential POPS Location further north more accurately reflects the Amexon proposal, which appropriately places built form along Eglinton Avenue East (closest to the transit station) while achieving the City's overall objectives for POPS and maintaining opportunities for coordination with abutting private and public open spaces.

Amexon requests that the draft Wynford Gervais Structure Plan be revised to identify the Future Street, Conceptual Park Areas and Potential POPS Locations on the subject site in the locations generally illustrated on Amexon's September 2025 PAC plans, which continue to be coordinated and refined with the adjacent landowners.

## **Proposed Policies for the Wynford Gervais Site**

### Purpose

- **Draft Policy 1** provides a statement of the overall purpose and intent of the SASP.

For the reasons outlined above and below we request the following modifications to provide sufficient flexibility for the comprehensive redevelopment of the Wynford Gervais Site.

- **Proposed Modification:** *Redevelopment of the lands, located within the Aga Khan Park & Museum Major Transit Station Area, will establish a transit-supportive, mixed-use, complete community through a connected network of new local streets and mid-block connections, ~~a consolidated, centrally-located~~ parks, an appropriate balanced mix of residential and non-residential uses, diverse housing opportunities and a high quality public realm.*



## Land Use

- **Draft Policy 3** requires non-residential uses be provided prior to, or concurrent with, residential uses. This policy does not provide sufficient flexibility.
  - **Proposed Modification:** *Non-residential uses ~~will~~ are encouraged to be provided prior to, or concurrent with residential uses...*
- **Draft Policy 5** requires that a minimum 15% of the total gross floor area on the lands, or 1.0 times the site area (net of certain exclusions), whichever is less, be non-residential gross floor area.

The subject site is vacant and accordingly provides no existing non-residential function. While Amexon acknowledges that the City proposes to update its minimum non-residential gross floor area requirements through this draft Policy to reduce the non-residential requirement of SASP 898 (currently requires a minimum non-residential floor area requirement of the greater of the equivalent of 1.0 times the net site area or 8,378 m<sup>2</sup>). Despite this change and consistent with Amexon's previous comments, it continues to be our opinion that the non-residential requirement should be removed to reflect the current deteriorated non-residential market reality. Alternatively, more flexible policy language should be considered.

Further Draft Policy 5 does not clearly state if the requirement is to be met proportionately on a site-by-site basis, or if it is to be achieved for the entirety of the Wynford Gervais Site as a whole.

- **Proposed Modification:** *A minimum of ~~15~~ per cent of the total gross floor area on the lands, or 1.0 times the site area, excluding lands conveyed to the City or other public body for new parks, open spaces, natural areas, streets and/or lanes, whichever is less, ~~will~~ is encouraged to be non-residential gross floor area.*
- **Draft Policy 6** also refers to the numeric minimum non-residential gross floor area requirement. Consistent with the above comments on Draft Policy 5, we request that the language of Draft Policy 6 delete reference to the numeric minimum non-residential requirement.
  - **Proposed Modification:** *~~The minimum required n~~ Non-residential gross floor area is encouraged to include...*

## Public Realm

- **Draft Policy 7** directs that the three (3) landowners within the Wynford Gervais Site provide a consolidated, centrally located park.

As noted above, the landowners have never contemplated a single consolidated park block, but rather a series of strategically placed parks fronting existing or



proposed public streets that are connected by a network of integrated potential POPS and mid-block connections. We request that Draft Policy 7 be revised to provide greater flexibility to allow for parkland to be coordinated but not necessarily consolidated to satisfy each of the landowners' parkland dedication obligations under Section 42 of the *Planning Act*.

- **Proposed Modification:** *New parkland will be planned and secured through the coordination ~~coordinated—consolidation~~ of parkland dedications from multiple developments ~~and/or landowners, as applicable, to establish a centrally located park.~~*
- **Draft Policy 8** encourages the incorporation of Potential POPS Locations pursuant to the Wynford Gervais Structure Plan (Map 1). While Draft Policy 8 only encourages the incorporation of POPS as generally identified on Map 1, as noted above Amexon requests that the Potential POPS Location identified on the subject site be relocated slightly north near the northeast portion of the lands. Further, insufficient rationale has been provided by the City to justify the inclusion of sub-policies 8 a)-c).
  - **Proposed Modification:** *Privately owned, publicly-accessible spaces (POPS) are encouraged in the general locations identified on Map 1 – Structure Plan to achieve multiple public realm objectives, ~~including:~~*
    - a) ~~Preservation of existing mature trees;~~*
    - b) ~~Visibility to the adjacent cultural heritage resource and the Aga Khan Park and Museum and Ismaili Centre; and~~*
    - c) ~~Opportunity for connectivity to the Aga Khan Park and trail.~~*
- **Draft Policy 11** provides requirements for the design and location of Potential Mid-Block Connections as encouraged pursuant to Draft Policy 10 and Map 1, including that Potential Mid-Block Connections provide direct sight lines and generous pedestrian clearways.

In the context of the Wynford Gervais Site, proposed sub-policy 11e), which requires that Potential Mid-Block Connections provide direct sight lines for the entire route, does not provide sufficient flexibility and does not appropriately consider the grading of the lands. Additionally, it is unknown what is specifically intended in sub-policy 11g) through the reference to accommodating “generous” pedestrian clearways.

- **Proposed Modification:** *Mid-block connections will be located and designed to:*
  - d) Be publicly-accessible;*
  - e) Be well lit and are encouraged to have clear ~~and-direct~~ sight lines ~~for~~ along the entire route;*
  - f) Incorporate cycling facilities and/or landscaping, including trees, where appropriate;*



g) Accommodate *generous appropriate* pedestrian clearways and where internal to a building, have generous width and height to ensure comfort and visibility.

### Community Services and Facilities

- **Draft Policies 12 to 15** speak to new and/or expanded community services and facilities.

As part of future development, a Community Benefits Charge will be paid to support the creation of facilities and services to support complete communities. These facilities and services may also be provided “in-kind”, and the City can only secure community facilities in an amount equivalent to 4 percent of the value of the land. We also understand that the City of Toronto is currently in the process of completing a two-phase 2024 PPS Consistency Exercise, which is meant to bring forward Official Plan amendments to ensure the City’s Official Plan is consistent with the 2024 PPS. As part of Phase 2 of the Consistency Exercise, we understand that the City may address policy conflicts including reviewing Chapter 5, Section 37 policies for updates to reflect Community Benefits Charge provision.

Draft Policies 12 to 15 are not supportable in their current form and should be deleted or modified to reflect the Community Benefits Charge provision, as appropriate.

- **Proposed Modification:** *Delete Draft Policies 12, 13, 14 and 15.*

### Environment and Climate Change

- **Draft Policy 16** directs that development is to incorporate strategies and implement best practices to reduce greenhouse gas emissions and adapt to climate change.

- **Proposed Modification:** *Development **is encouraged to** ~~will~~ incorporate strategies and on-site improvements to reduce greenhouse gas emissions in support of Toronto’s goal of net zero greenhouse gas emissions by 2040 and to adapt, and be resilient, to the impacts of climate change. Best practices in building and urban systems design will be identified and **is encouraged to be** implemented through development applications to advance opportunities for a near-zero-carbon community.*

- **Draft Policy 17** provides direction that development will aim to implement the highest level of the Toronto Green Standards in effect at the time of any application. While it is acknowledged that Draft Policy 17 does not require a development to meet the highest level of the Toronto Green Standard, for sufficient clarity we recommend that the wording be modified to encourage, as Tier 2 and 3 Toronto Green Standard performance measures are voluntary.



- **Proposed Modification:** *Development ~~will aim~~ is encouraged to implement the highest level of the Toronto Green Standard in effect at the time of application.*

### Built Form

- **Draft Policy 20** directs that a variety of built form massing and height be provided and that buildings will generally transition down in height and scale from the southwest corner of the Gervais Wynford Site reflecting increasing distance from higher-order transit and providing an appropriate transition to the adjacent open space at the Aga Khan Park and Museum and Ismaili Centre.

While the general principle of appropriate transition is understood by Amexon the intent of how this is intended to be implemented through Draft Policy 20 is not. The Amexon site is located approximately 85 metres from the Aga Khan Park & Museum Station stop. Pursuant to the Minister of Municipal Affairs and Housing's approval of OPA 540, Chapter 8 of the Official Plan was amended to require the City to initiate an amendment to its Zoning By-law to permit a permitted density of 8.0 FSI or more for lands within 200 metres of an existing or planned transit station; which includes the subject site.

- **Proposed Modification:** *Development will provide a diversity of built form massing and height, including tall and/or mid-rise buildings, reflective of proximity to higher-order transit and shall be designed to achieve an appropriate ~~pedestrian~~ scale and character. Development will consider ~~Buildings will generally transition down in height and scale from the southwest corner, reflecting increasing distance from higher-order transit and providing an appropriate transition to~~ the adjacent open space at the Aga Khan Park and Museum and Ismaili Centre.*
- **Draft Policy 21** includes rigid streetwall height requirements. It is our opinion that the inclusion of numerical development standards in Official Plan policy is inappropriate and should instead be identified in zoning by-laws. Further, the draft policy (particularly sub-policy 21b) would also result in unnecessary challenges to the building podium design and construction since each segment of the proposed buildings "streetwall" could be subjected to a different streetwall requirement depending on its orientation toward a street, park, potential POPS and/or mid-block connection. We request that more broadly applicable language be utilized to require the implementation of appropriate street walls that respond to site-specific considerations or alternatively a more flexible policy requirement be included.
  - **Proposed Modification:** *Streetwalls will be designed to be compatible with the existing and planned context, ~~including:~~*
    - a) *A streetwall height up to generally 6 storeys ~~along all streets; and~~*



*b) A streetwall height of up to 4 storeys where fronting parkland, POPS, and/or midblock connections to will provide a pedestrian scale and built form transition.*

- **Draft Policy 25** includes minimum required setbacks to Eglinton Avenue East. As noted above, it is our opinion that the inclusion of numerical development standards in Official Plan policy is inappropriate and should be identified in zoning by-laws.
  - **Proposed Modification:** *Notwithstanding the above, new buildings along Eglinton Avenue East should **generally** be set back **a minimum of 3 metres** **to** provideing space for pedestrians, landscape and amenity including high quality pedestrian walkways, weather protection, trees with understory planting, patios and seating to support non-residential uses on the ground floor.*
- **Draft Policy 27** includes minimum required setbacks to a park. As noted above, it is our opinion that the inclusion of numerical development standards in Official Plan policy is inappropriate and should be identified in zoning by-laws. In the alternative, more flexible policy language should be utilized.
  - **Proposed Modification:** *Development **above grade** will **be appropriately** **be** set back **a minimum of 5 metres** along **any frontage adjacent to** a park, to allow the building and any of its exterior amenities to be provided and maintained on the development site.*

## Housing

- **Draft Policy 29** requires a mix of housing by tenure, size and affordability. It is recommended that this draft policy be modified to encourage a mix of housing options.
  - **Proposed Modification:** *A mix of housing by tenure, size and affordability **is encouraged** **will be achieved** to offer housing options for a wide variety of households. Residential development will support complete and inclusive communities through a range of housing opportunities across the housing spectrum.*
- **Draft Policy 30** requires that a minimum of 40 percent of new residential units in developments have two or more bedrooms. In keeping with policy directives in other areas of the City, such as within the Downtown Plan and the Yonge-Eglinton Secondary Plan, we request that this policy be modified by adding the following new sub-policy 30c).
  - **Proposed Modification:** *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; and

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

- **Draft Policy 33** identifies requirements for minimum affordable housing that are only applicable to the Amexon subject site. However, since SASP 898 is proposed to be deleted and replaced with a new SASP 828 that will include a three (3) landowner parcels within the Wynford Gervais Site, we believe that the inclusion of different and significantly more onerous affordable housing requirements for Amexon is unfair and inappropriate. The direction provided by the Minister of Municipal Affairs and Housing in January 2025 as it pertains to the final approval of OPA 653/SASP 828, provides a clear provincial direction for the removal of mandatory affordable housing requirements within the Wynford Gervais Site. Draft Policy 33 should be deleted, with affordable housing on the subject site being governed by Draft Policy 31.

➤ **Proposed Modification:** ~~Delete Draft Policy 33.~~

### Implementation & Phasing

- **Draft Policy 37** requires that development provide any necessary municipal water, wastewater and stormwater servicing infrastructure prior to development proceeding “and any zoning by-law amendment approval”. Implementation of municipal servicing improvements, as deemed necessary and appropriate, are secured through the detailed design stage. It is inappropriate to withhold zoning approval until the construction of municipal servicing improvements.
  - **Proposed Modification:** *Development will not exceed the capacity of existing municipal water, wastewater and stormwater servicing infrastructure. Where existing municipal infrastructure is inadequate to support proposed and planned growth, development will be required to provide the necessary upgrades or improvements to existing local municipal servicing infrastructure, or new local infrastructure, where needed, to ensure there is adequate capacity in the system, prior to development proceeding ~~and any zoning by-law amendment approval~~. Construction of and/or improvements to municipal servicing will be secured through conditions of approval for development applications to ensure that servicing will be available to support development.*



- **Draft Policy 38** includes additional conditions to be met prior to the removal of a holding (“H”) provision. We note that transportation and servicing improvements and measures to protect heritage buildings are already listed as conditions in Policy 5.1.2 of the Official Plan. We would like clarification on the City’s rationale for proposing additional enabling policies in new draft SASP 828 related to a holding (“H”) provision. In any event, it is our opinion that these additional provisions are unnecessary and inappropriate and therefore should be deleted.
  - **Proposed Modification:** *Delete Draft Policy 38.*
- **Draft Policy 39** states that the landowners within the SASP area may be required to enter into a developers group agreement. While the landowners have committed to collaborating on a shared vision for the SASP area, we would like clarification on why the City needs to receive such agreement as a condition of approval. We request that his draft policy be deleted.
  - **Proposed Modification:** *Delete Draft Policy 39.*

### Final Statements

The above constitutes Amexon’s preliminary comments based on our initial review of the draft amendments and new draft SASP 828. We reserve the right to provide further additional comments.

We also continue to request copies of all background studies that have informed the Don Mills Study to date; including but not limited to any transportation studies, market studies, or urban design studies.

Thank you for providing us with the opportunity to provide you with this input and trust that it will be taken into consideration as the draft SASP policies for the Wynford Gervais Site continue to be developed. Should you require any additional information or have any questions, do not hesitate to contact the undersigned.

Regards,

**Richard Domes**  
**Partner, Principal Planner**

C.C.: Amexon Development Corporation  
McMillan LLP  
Gagnon Walker Domes Ltd.



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

October 28, 2025

GWD File: 1878.00

**City of Toronto  
Community Planning - North York District  
North York Civic Centre  
5100 Yonge Street  
Toronto, Ontario M2N 5V7**

**Attention:** Jessica Krushnisky ([Jessica.krushnisky@toronto.ca](mailto:Jessica.krushnisky@toronto.ca))

**Subject: Landowner Comments  
Don Mills Regeneration Areas Landowner Meeting #2  
1200 Eglinton Avenue East, City of Toronto  
Amexon Development Corporation**

Gagnon Walker Domes Ltd. ("GWD") represents Amexon Development Corporation ("Amexon"), the owner of the property located at 1200 Eglinton Avenue East, in the City of Toronto (the "subject site"). The subject site measures approximately 0.84 hectares (2.07 acres), with frontage of approximately 93 metres along Eglinton Avenue East. The subject site is vacant.

Over the course of the last several years, Amexon has been coordinating the development of the subject site with the landowners of the two (2) adjacent properties located at 39 Wynford Drive and 15 Gervais Drive. The landowners of these three (3) properties have also previously met with City staff as a group on multiple occasions. This has culminated in the each of the three (3) abutting landowners recently filing separate but coordinated formal Pre-Application Consultation Meeting Requests with City Planning staff, which has included a jointly prepared Landowner Master Plan that has advanced a comprehensive approach with respect to roads, parks, public realm and built form.

Don Mills Regeneration Area Landowner Meeting #2 was hosted by the City of Toronto and its retained consultants on October 15, 2025. GWD attended this meeting on behalf of Amexon, along with representatives 39 Wynford Drive and 15 Gervais Drive (as well as representatives of the separate Regeneration Area lands located on Leslie Street).

During the Landowner Meeting the City of Toronto and its consultants presented a Draft Structure Plan to the Wynford/Gervais/Eglinton Block landowners for the first time. While City staff and its consultants acknowledged receipt of the coordinated Landowner Master Plan during the Landowner Meeting, the Draft Structure Plan fails to appropriately consider and reflect the comprehensive development of the Wynford/Gervais/Eglinton Block, as proposed by Amexon and the abutting landowners.

This letter serves to provide Amexon's initial comments and concerns with the Draft Structure Plan pertaining to the Wynford/Gervais/Eglinton Block.

---

**GAGNON WALKER DOMES LTD.**

7685 Hurontario Street, Suite 501 • Brampton ON Canada L6W 0B4 • P: 905-796-5790  
www.gwdplanners.com • Toll Free: 1-855-771-7266



### Conceptual Public Street

Amexon has significant concern with the conceptual public street, as proposed by the City. The City's Draft Structure Plan includes an 'L'-shaped public street between Gervais Drive and Wynford Drive that is located on each landowner parcel of the Wynford/Gervais/Eglinton Block. We understand that the City's rationale for the proposed extent and configuration of the conceptual public street is to provide connectivity through the sites, to provide frontage along the public park, and to provide public street frontage along the development blocks for vehicular access and servicing.

The conceptual public street proposed in the Draft Structure Plan is not consistent with the location and extent of the public street proposed in the Landowner Master Plan. It is our opinion that the conceptual public street proposed by the landowners achieves the City's objectives for connectivity, frontage along a future potential public park, and efficiently facilitates the necessary vehicular and servicing required to serve future development within the blocks (both independently and comprehensively); while optimizing development potential within a Major Transit Station Area ("MSTA"). The landowners' conceptual public street is strategically configured to more easily enable its physical implementation and provides appropriately sized development blocks. The landowners' public street configuration has also been technically assessed, and it has been determined to be sufficient from an operational perspective to support the level of intensification proposed by the landowners. It is our understanding that no technical studies have been completed to date in support of the City's proposed conceptual public street configuration.

The conceptual public street identified in the Draft Structure Plan inherently hampers development feasibility. The alignment of the conceptual public street creates irregularly shaped and/or remnant parcels, on all landowner sites. As this pertains to Amexon specifically, it would create a single, diminished development parcel that would significantly constrain intensification on the subject site as well as a remnant, narrow sliver of land along the east lot line.

Further, the need for the north-south leg of the conceptual public street has not been sufficiently justified. It is Amexon's opinion that the extent of the conceptual public street is surplus to requirements and promotes the use of the personal automobile, which is inconsistent with the Provincial and City objectives that promote development patterns that support increased transit usage and other sustainable transportation methods within MTSAs.

### Conceptual Public Parkland

Amexon also has significant concerns with the consolidated potential public park identified on the Draft Structure Plan. While the configuration of the potential public park is conceptual, it is predominantly located on the Amexon property and substantially exceeds Amexon's parkland dedication obligations under Section 42 of the *Planning Act*. The location and extent of the conceptual public park, as currently proposed by the City, places an unfair burden on Amexon and further reduces development feasibility.



The public parkland strategy proposed by the Landowner Master Plan identifies a public parkland contribution at the eastern terminus of the public street. This public park contribution is proposed to be shared by Amexon and the abutting landowner at 39 Wynford Drive and will provide a contiguous and functional public park that is located at a key terminus location. The parkland proposed by Amexon and 39 Wynford Drive also provides opportunity for integration of green spaces and other linkages with the abutting Aga Khan property. Additional parkland contribution is proposed in the Landowner Master Plan at the northeast corner of Gervais Drive and Eglinton Avenue East.

The public park strategy as shown on the Landowner Master Plan advances an implementable open space framework that would satisfy each landowner's parkland dedication obligations under Section 42 of the *Planning Act*.

### Conceptual Mid-Block Connections

A series of conceptual mid-block connections are identified on the Draft Structure Plan, oriented in a north-south orientation that are intended to link Wynford Drive to Eglinton Avenue East. While the conceptual mid-block connection shown on the Amexon site is generally in accordance with that proposed on the Landowner Master Plan, it is Amexon's opinion that the overall pedestrian connectivity contemplated in the Landowner Master Plan (which proposes a series of north-south as well as various east west mid-block connection opportunities) is superior to what is proposed in the City's Draft Structure Plan.

The extent, location and configuration of mid-block connections will require further discussion based on the outcomes of the other identified concerns noted herein.

### Major Transit Station Area Density Requirements

The Wynford/Gervais/Eglinton Block is located within 200 metres of the Aga Khan Park & Museum Station and the adjacent Ontario Line Station. The Amexon site is located 85 metres from the Aga Khan Park & Museum Station stop.

Through the Minister of Municipal Affairs and Housing's approval of Official Plan Amendment ("OPA") 540, Chapter 8 of the Official Plan was amended to require the City to initiate an amendment to its parent Zoning By-law to permit higher FSI as-of-right for lands within an MTSA or a Protected MTSA that are designated *Apartment Neighbourhoods, Mixed Use Areas or Regeneration Areas*, as per the below:

- 8 FSI or more for lands within 200 metres of an existing or planned transit station.

Accordingly, the City is expected to undertake and enact a Zoning By-law Amendment that would allow a density of 8 FSI or more on the subject site and abutting landowner parcels as-of-right.

The Draft Structure Plan does not appear to advance a framework for the regeneration of the Wynford/Gervais/Eglinton Block that is consistent with Official Plan Amendment 540. As it pertains to the Amexon specifically, the Draft Structure Plan proposes that over 60% of the subject site be conveyed for public streets, parks, or public connections. As



proposed, the Draft Structure Plan significantly diminishes the subject site's intensification opportunity and will likely result in an inability to achieve the density of 8.0 FSI as prescribed through Official Plan Amendment 540. Amexon's proposed development, as advanced through the Landowner Master Plan, contemplates a proposed density of 8.4 FSI on a gross site basis, which achieves the density requirements of OPA 540.

### Non-Residential Uses

With respect to the City's on-going review of potential non-residential use requirements for the Don Mills Regeneration Study Area, we continue to request that City staff consider a reduction in the non-residential floor space requirement. Amexon recognizes that SASP 828 and SASP 898 set out minimum non-residential gross floor area requirements. However, since the approval of these SASPs, the office market has significantly deteriorated, and in response, the City undertook an Office Space Needs Study that concluded that the City is unlikely to experience a need for new office space for ten (10) or more years and that current replacement policies fundamentally hinder development feasibility. In addition, through the ongoing mediation of OPA 231, the City has similarly recognized in other Regeneration Area studies that alternative approaches to non-residential minimums should be considered.

The Wynford/Gervais/Eglinton Block landowners are currently proposing to implement an approach generally aligned with the City's proposed policy directions in OPA 231, namely a 25% replacement of existing non-residential floor space with either non-residential space or alternative uses such as affordable housing. In the instance of the Amexon site, the lands are vacant and no existing office replacement applies, therefore Amexon proposes to provide 25% of the non-residential gross floor area requirement as set out in SASP 898.

### Heritage Status

While the Amexon site is vacant and does not possess any heritage value, we understand that the City of Toronto has identified "potential built heritage resources and cultural heritage landscape" on the abutting lands located at 39 Wynford Drive and 15 Gervais Drive. Amexon supports the concerns raised by the abutting landowners in relation to the suggested preservation of the existing buildings located on these neighbouring properties and believes that the City's Draft Structure Plan is inappropriately skewed on account of their suggested retention.

### Final Statements

The above constitutes Amexon's preliminary comments based on our initial review of the Draft Structure Plan presented by the City on October 15, 2025. We request that the City and its consultants incorporate the comments provided by the landowners of 1200 Eglinton Avenue East, 15 Gervais Drive, and 39 Wynford Drive as it further develops the draft Structure Plan for the Wynford/Gervais/Eglinton Block. Specifically, we request that the City adopt the Landowner Master Plan (attached) as the Draft Structure Plan for the reasons identified herein.



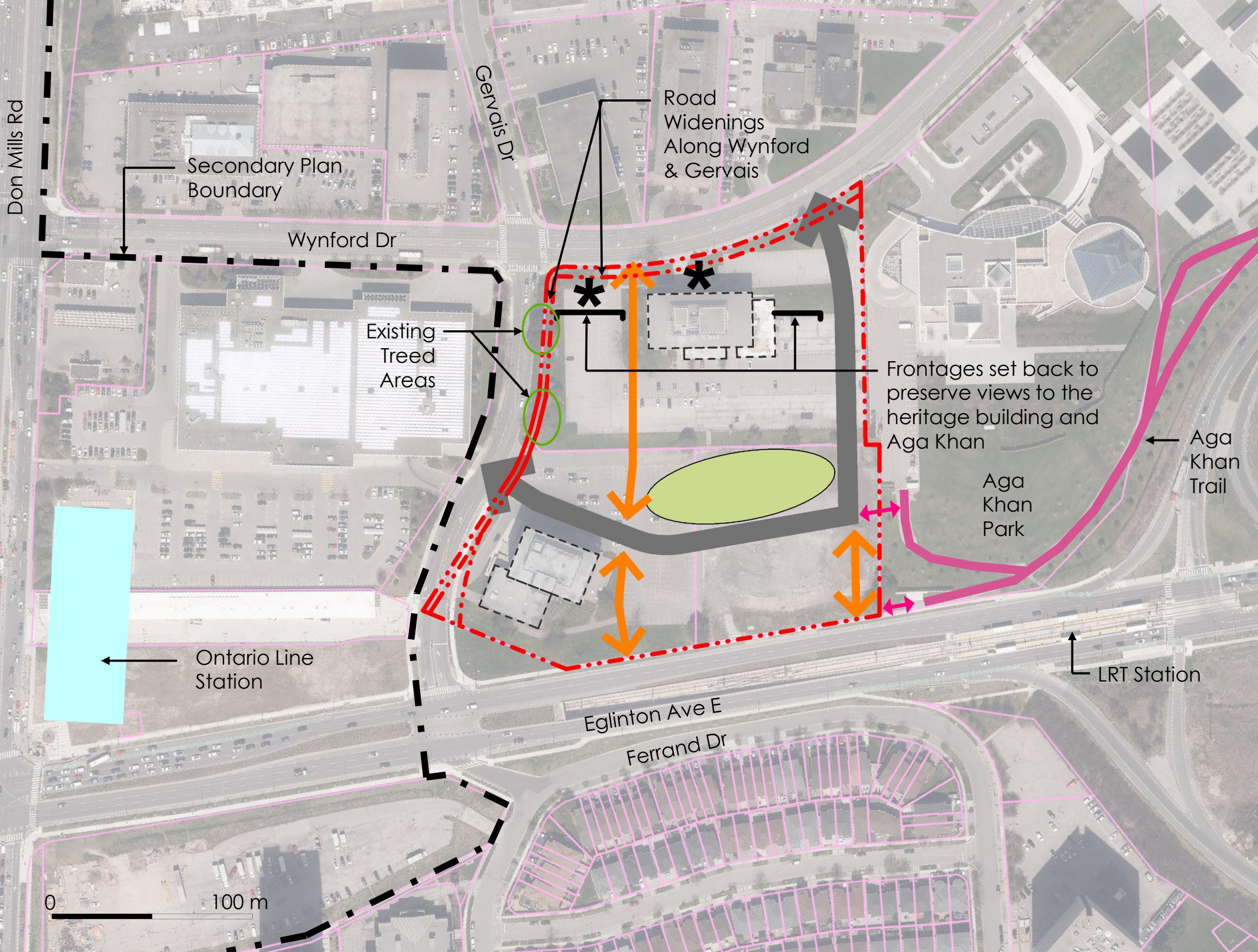
We also request copies of all background studies that have informed the Don Mills Regeneration Area Study to date; including but not limited to any transportation studies, community services and facilities study, market studies, or urban design studies.

We look forward to continued dialogue and consultation with the City. Should you require any additional information or have any questions, do not hesitate to contact the undersigned.

**Regards,**

**Richard Domes  
Partner, Principal Planner**

C.C.: Amexon Development Corporation



### Secondary Plan Context

- East-west connection.
- Views to Aga Khan Museum.

### Wynford Concord Strategy

- Public street access through site.
- Mid-block connections to improve pedestrian traversal through site.

### Public Realm

- Potential link to Aga Khan Park trails.
- Active frontages and edges along public streets.

### Heritage

- Block structure considers potential built heritage resources and cultural heritage landscape.

  Property Line  
   Heritage  
  Multi-Use Trail  
  Mid-Block Connection  
  Public Street  
  Potential Park  
 \* Potential POPS

# Wynford/Gervais/Eglinton – Draft Structure Plans



