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December 2, 2025

Planning and Housing Committee
2025.PH26.6, North York at the Centre:
Directions Report for an Updated Secondary Plan

**Re: Recommended Option – North York Centre Secondary Plan (NYCSP)
Preliminary Comments for 5320-5324 Yonge Street and 11 Churchill Avenue**

We are writing on behalf of the owners of the properties municipally known as 5320-5324 Yonge Street and 11 Churchill Avenue (the “subject site”). This correspondence is in response to the Recommended Option for the update to the North York Centre Secondary Plan (NYCSP) to be presented to Planning and Housing Committee for consideration on December 3, 2025.

The Recommended Structure Map identifies the subject site within a tall building area. The Recommended Land Use Map identifies the subject site within the Mixed Use Areas 2. The Recommended Building Heights and Types Map identifies the subject site within Tall Building Area 3 where heights between 15 – 45-stores are permitted.

Having reviewed the Final Options and Directions Report, November 2025 we identify the following issues that should be addressed as it relates to the approval granted by the OLT in its decision dated September 25, 2024:

- Within the section on Housing Unit Mix and Size, (page 115) the "Recommended Policy Directions No. 5" sets out a unit mix of at least 40% 2 and 3 bedroom units as 10% 3 bedroom, 15% 2 bedroom and 15% being a mix of 2 bedroom and 3 bedroom units. The proposed unit-mix requirement could negatively impact development feasibility. Unit sizes naturally vary with market demand, and fixed percentages will eliminate needed flexibility. Although this recommended policy direction identifies the permissions for a reduction in the unit mix, additional policy direction should be added to identify existing approvals. Alternatively, the addition of site specific exemption policies that recognize existing approvals taking place prior to adoption of a new NYCSP should be included.
- Within the section on Retail, (page 119) item 19 under "Recommended Policy Directions No. 19" prohibits specific retail uses (banks, offices and health care uses) and residential uses (with exception of compact lobbies) on Yonge Street. Our concern relating to this policy direction is twofold. First, the prohibition of specific uses reduces the flexibility in retail tenants to occupy ground floor uses. Banks, offices and health care uses have been incorporated as ground floor uses in other mixed-use development within the City. Secondly, our concern relates to the interpretation of "compact lobby" which appears to control the design of the lobby size solely at the discretion of the City and not relative to the area requirements needed for such spaces. In the absence of a definition or guideline respecting lobby size, this issue may impact on the general layouts of all residential lobby areas;
- Map 4-7 identifies Churchill Avenue as "Side Streets with Street Tree and Landscape Setback (3m)" which does not reflect the approved 1.5m setback on Churchill Avenue at the west

portion of site. We suggest that acknowledgement of previous approvals be included, or alternatively a site specific policy respecting the subject site be included;

- Similarly, the section on Streetscape Improvements, on page 134 within the "Recommended Policy Directions No. 68" calls for a 3m building setback to side streets. The same concern regarding the above referenced concern relating to Map 4-7 applies; and,
- Map 4-13 identifies the subject site as within Tall Building Area 3 (46-136m/15 to 45 storeys) which coincides with the approved heights of 45 storeys and 35 storeys. It is noted that the Tall Building Area 2 boundaries for North York Centre Station extend only to the south of Empress Avenue. What is the rationale for not extending the Tall Building Area 2 to the north an equal distance from the station entrance?

Based on this review of the Final Options and Directions Report, November 2025, and the review of the approved development, we suggest that the recommended policy direction to be included in the secondary plan should include either implementation policies recognizing existing approvals or that the incorporation of site specific policies to recognize approvals be included.

Should the recommended option be endorsed by Planning and Housing Committee an alternative solution to the inclusion of implementation policies or site specific policies is to include a similar policy included in OPA 615 (Section 9 – Implementation) which provides the following:

Minor Variations

9.14 Minor variations to the policies within Section 3: Public Realm and Section 8: Built Form of the Yonge Street North Secondary Plan shall be to the satisfaction of the City, be minor in nature, and shall respond to the unique conditions or context of a site. Such variations will not require an amendment to this Plan.

We would be pleased to meet with the staff to discuss this matter further. We also request notice of any upcoming report and/or meeting(s) concerning this topic area, and any decision regarding this matter. Please do not hesitate to contact me at ext. 2103.

Yours very truly,
GOLDBERG GROUP



Todd Trudelle
Associate

cc. A1 Developments Inc.