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December 1, 2025

City of Toronto Planning and Housing Committee  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Attn: Nancy Martins

Dear Ms. Martins,

**Re: Response to North York Centre Secondary Plan Directions Report  
83 and 85 Drewry Avenue  
83 Drewry Avenue Inc. and 85 Drewry Avenue Inc.**

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## 1.0. Background

We are writing on behalf of 83 Drewry Avenue Inc., and 85 Drewry Avenue Inc., collectively the “**Owner**” of the properties municipally known as 83 and 85 Drewry Avenue (the “**subject site**”). The subject site is an assembly of two (2) individual lots of record, each of which currently support a detached dwelling, with frontage of approximately 28.5 metres (+/-93.5 feet) along the south side of Drewry Avenue, east of Fairchild Avenue. This correspondence provides additional commentary related to the City’s publication of the Final Options and Directions Report as part of the ongoing update to the North York Centre Secondary Plan (the “**NYCSP**”).

On behalf of the Owner, we have previously provided comments related to the NYCSP emerging preferred option on May 2, 2025. For convenience, we have included our prior comments as Appendix A to this letter.

## 2.0. Description of Area Context

The subject site is located within an area along Drewry Avenue which is characterized by a mix of ground related housing and larger institutional properties, some of which have been recently approved for more intensified residential use (172-202 Drewry Avenue). The subject site is located at the northwest periphery of the NYCSP area, and it is notable that Drewry Avenue also serves as the southern boundary of the Yonge North Secondary Plan, east of the future extension of Lariviere Road. The NYCSP has seen significant development and intensification over the last 2 decades plus, given its location at the intersection of two (2) subway lines, being a *Centre* in City policy terms, and being in proximity to a diverse range of community amenities, retail, commercial and office uses.

The subject site has excellent surface and rapid transit connectivity. The subject site is located approximately 310 metres (an approximate 4-minute walk) from the intersection of Yonge Street with Drewry Avenue/Cummer Avenue. While the previously contemplated Cummer Subway Station has not been included in the Yonge North Subway Extension (YNSE), the subject site is located approximately 500 metres (an approximate 6-minute walk) from the kiss-and-ride entrance to the Finch subway station. Additionally, existing TTC Bus Routes operate along Drewry Avenue past the subject site, with the nearest

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bus stops located directly opposite the lands on the north side of Drewry Avenue, and the west side of Fairchild Avenue.

Finch Station is a Major Transit Hub where the Yonge subway line, many TTC surface transit routes, Viva transit, and Go Transit surface routes converge at the bus terminal north of Finch Avenue West. In planning terms, this is a Major Transit Hub. Further, the delineation of the Finch Station Protected Major Transit Station Area (**PMTSA**) was approved by the Minister of Municipal Affairs and Housing through Official Plan Amendment No. 570 (OPA 570) on August 15, 2025. OPA 570 establishes Site and Area Specific Policy No. 727 (SASP 727), which is planned for a minimum population and employment minimum target of 350 residents and jobs combined per hectare. The subject site is located within the Finch Station PMTSA and SASP 727.

Notably, the extension of Greenview Avenue/Beecroft Road north to Drewry Avenue would serve to improve the connectivity of the subject site to the Finch Subway Station, thus potentially reducing the travel distance and walking time further.

### **3.0. Policy Context**

#### **Provincial Policy Statement (PPS 2024)**

The Provincial Planning Statement 2024 (PPS 2024) was issued under section 3 of the Planning Act and came into force on October 20, 2024. PPS 2024 emphasizes the promotion of intensification, compact development, and transit-supportive densities aimed to optimize land and infrastructure use, including public transit and pedestrian-friendly design. A key focus of the PPS is the intensification of lands around existing and proposed higher-order transit stations, to enable the provision of a broader range of housing and potentially employment opportunities close to transit stations.

The subject site is by definition in the PPS 2024, within a *Strategic Growth Area* and a *Major Transit Station Area* due to its location well within 800 m of *higher order transit* and *frequent transit* service, including the Finch subway station. Many of the surface nearby transit routes operate all day, seven days a week, and in some cases, provide transit service every ten minutes or better. By definition, such transit routes are referred to *Frequent Transit* by the PPS.

#### **City of Toronto Official Plan (the “City OP”)**

The subject site and adjacent lands are designated *Mixed Use Areas* on Map 16 - Land Use of the City OP. The *Mixed Use Areas* designation permits a broad range of commercial, residential and institutional uses, in single use or mixed-use buildings. Lands within this designation are also intended to absorb much of the anticipated increase in new housing within the City. Additionally, Map 2 - Urban Structure identifies the subject property as a *Centre* (more specifically the North York Centre), which is also a designation where growth and intensification is to continue as a vibrant residential and cultural centre, as well as an important commercial office location.

### **4.0. Response to Final Options and Directions Report**

Within the previously release ‘emerging preferred option’ the subject property was identified within a tall building area, with a maximum height of 35-storeys. The potential land use designation was identified as *Mixed Use Areas 2 (MUA 2)*, which is intended to “accommodate high density residential uses as well as a wide variety of non-residential uses such as institutions, arts and cultural facilities, community services and office uses if there is demand.”

The lands are still within the MUA 2 designation, which appears to recognize the intensification of many properties over the last 20 years with “a significant amount of high density residential development”. The

designation still envisions high-density residential development, as well as office, and encourages other non-residential uses given proximity to transit.

We do not understand why the Recommended Option now shows the subject site within a *Mid-rise Building Area* (Figure 4-13), and subject to a height restriction of 6-storeys within *Mid-Rise Building Sub-area 3* (Figure 4-14), whereas the previous 'emerging preferred option' identified this site for a 'tall building'.

We suggest that this is not an efficient use of lands within the Plan boundary or a PMTSA, nor is it representative of the intent of the MUA 2 vision, or the evolving context of the area. We recommend and request that the permitted height be revised back to the previously contemplated tall building form.

### **Expansion of Secondary Plan Boundary**

We support the notion of expanding the NYCSP boundary, as we expect this recognizes that much of the lands at the heart of the Centre have already been redeveloped with more intensive built form. On this basis, further redevelopment activity will be more limited at the heart of the Centre over the planning horizon of the City OP or NYCSP. We believe that it is therefore important that the Plan optimize the land base available to accommodate growth proximate to transit, and the mix of uses that typify the Yonge Street corridor.

Accordingly, we suggest that additional expansions to the NYCSP boundaries be considered west of Yonge Street, and north of Finch Station/the Finch Hydro Corridor, as contemplated in Alternative Option 2. This would provide additional opportunity for transition towards adjacent communities, without limiting the ability of lands already within the Plan Area (including the subject site) to redevelop to their full and optimal potential.

### **Housing Unit Mix and Size**

The proposed policy directions seek to increase the typical City standard for larger unit sizes, requiring a minimum of 40% of units to be 2- and 3-bedroom. While we appreciate the intent of this direction, we suggest that it is essential to realize the correlation of unit size to housing cost. Accordingly, any policy related to this measure must be carefully calibrated to allow a proponent to appropriately respond to market conditions without the need to seek relief from the Plan through an Amendment.

We also suggest that any future policy should also recognize the potential to consolidate units as a means to satisfy the intent of this direction.

### **Retail, Inclusive Economic Development, and Arts and Culture**

While the subject site is not located along a *Primary* or *Secondary Retail Street*, we note the recommendations to encourage flexible space for business incubators and markets. In this regard, we feel that it is important to consider the increased economic activity occurring within residential units post COVID, where people are working from home on a more frequent basis, as well as the expansion of what may constitute a typical 'job'. In our experience, this has translated to additional focus on amenity areas that accommodate such users in the form of work focussed areas, boardrooms, as well as studios and 'maker spaces'.

We suggest that consideration should be given to recognizing the important economic function such areas may serve by providing encouragement or even incentives for the inclusion of such areas within residential buildings.

### **Green Infrastructure**

It is our experience that it is often difficult to achieve the soil volumes required by the City for lands intended for high-density redevelopment. We suggest that consideration should be given to relaxing these

requirements to optimize opportunities to provide housing proximate to transit. We also suggest that it is necessary to increase the variety, size, and cultivars of trees that are considered acceptable in what is intended to be a highly urban condition, recognizing that all trees still provide benefit to the public, but may not require the same space to thrive. We understand this is a similar approach to that recently implemented by the City of Oakville.

We also suggest that discussions should be held with the City Engineering Department to allow the provision of low impact development (LID) measures within the City right-of-way to reduce development costs, and make more efficient use of all lands within the NYCSP for stormwater management purposes.

### **Action on Climate Change**

It has been our experience that the costs of the necessary upgrade to achieve higher performance levels of the Toronto Green Standard (TGS) exceed the incentives provided by the City through reduced development charges. Additionally, the market often does not recognize, or place value upon, the increased sustainability when it results in higher housing costs.

Accordingly, while we support the recommendation to encourage the achievement of higher TGS levels, we suggest that it will involve a more comprehensive and holistic approach to ensure that a full suite of potential incentives are provided, such that there is no net increase, or preferably a decrease, in project costs.

### **Public Realm**

It is unclear from the figures in the Report what Drewry Avenue or Fairchild Avenue are classified as with respect to streetscape improvements.

### **Cycling Improvements**

Drewry Avenue is indicated as a *Planned Cycling Route*. We request confirmation that the implementation of this route will not trigger additional road widening requirements that may reduce the developable area of the subject site.

## **4.0 Conclusions and Recommendations**

We request that the City reconsider the preferred option to optimize development opportunities for the subject site to allow tall buildings to continue to occur.

We would be pleased to meet with the staff and Local Councillor to discuss the Owner's plans for this site and its comments on the NYCSP Review in particular. 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 the undersigned.

Yours very truly,

**GOLDBERG GROUP**



Adam Layton, MCIP, RPP  
Associate Principal

cc. Members of the Planning and Housing Committee

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Jason Thorne, Chief Planner and Executive Director of City Planning  
Valesa Faria, Executive Director of Development Review  
Jana Neumann, Senior Planner, Strategic Initiatives  
Stephen Gardiner, Senior Planner, Community Planning  
83 Drewry Avenue Inc.  
85 Drewry Avenue Inc.

**APPENDIX A**

**PRIOR COMMENTS – MAY 2, 2025**



ADAM LAYTON, MCIP, RPP  
alayton@goldberggroup.ca  
(416) 322-6364 EXT. 2101

May 2, 2025

Community Planning  
Development Review Division North York Civic Centre  
Ground Floor, 5100 Yonge Street  
Toronto ON M2N 5V7

Attn: Mr. Stephen Gardiner, Senior Planner

Dear Mr. Gardiner,

**Re: Emerging Preferred Option – North York Centre Secondary Plan (NYCSP)  
Preliminary Comments on behalf of 83 and 85 Drewry Avenue**

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The subject site is located within an area along Drewry Avenue which is characterized by a mix ground related housing and larger institutional properties, some of which have been recently approved for more intensified residential use (172-202 Drewry Avenue). The subject site is located at the northwest periphery of the NYCSP area, and it is notable that Drewry Avenue also serves as the southern boundary of the Yonge North Secondary Plan, east of the future extension of Lariviere Road. The NYCSP has seen significant development and intensification over the last 2 decades plus, given its location at the intersection of two (2) subway lines, being a *Centre* in City policy terms, and being in proximity to a diverse range of community amenities, retail, commercial and office uses.

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### 3.0. Policy Context

#### Provincial Policy Statement (PPS 2024)

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The subject site and adjacent lands are designated *Mixed Use Areas* on Map 16 - Land Use of the City of Toronto Official Plan (City OP). The *Mixed Use Areas* designation permits a broad range of commercial, residential and institutional uses, in single use or mixed-use buildings. Additionally, Map 2 - Urban Structure identifies the subject property as a *Centre* (more specifically the North York Centre), which is also a designation where growth and intensification is to continue as a vibrant residential and cultural centre, as well as an important commercial office location.

#### Official Plan Amendment No. 570 – Protected Major Transit Station Areas

OPA 570, as adopted by Council on July 19, 20, 21 and 22, 2022, amends the City Official Plan to implement a framework to facilitate transit-supportive development through the delineation of *Major Transit Station Areas* (“MTSAs”) and *Protected Major Transit Station Areas* (“PMTSAs”). This OPA is not yet approved by the Minister.

The subject site is identified within the Finch *PMTSA* (Site and Area Specific Policy No. 727), which is planned for a minimum population and employment minimum target of 350 residents and jobs combined per hectare.

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Emerging Preferred Option – North York Centre Secondary Plan

The NYCSP is currently under review to better reflect current development conditions and trends for a *Centre* in the City OP, to better reflect the establishment of the Sheppard-Yonge and Finch PMTSAs, and to implement the updated and new policies of the PPS 2024. The first phase of the Secondary Plan Review, Background Review, provides a foundation for understanding existing and planned conditions, and identifies opportunities and constraints to guide future planning decisions in the *Centre*. Public Meetings were held to share and discuss the proposed emerging preferred option as further described below.

Within the emerging preferred option, the subject property continues to be located at the edge of the Plan area. *Map 1 – Structure* identifies the subject site within a tall building area, with a maximum height of 35-storeys, as shown on *Map 2 – Building Types and Heights*. *Map 3 – Land Use* identifies the subject site within the *Mixed Use Areas 2*. It would continue to “accommodate high density residential uses as well as a wide variety of non-residential uses such as institutions, arts and cultural facilities, community services and office uses if there is demand.”

#### **4.0 Conclusions and Recommendations**

We recognize that the NYCP review is still in the early stage, with detailed policies to be development in the future. On this basis, our Client is generally pleased with the proposed building height (35-storeys) and uses permitted on the subject site.

Notwithstanding this, we request additional details with respect to how the City will seek to achieve ‘transition’ to the lands outside of the NYCSP area north of Drewry Avenue and west of Fairchild Avenue. We would be opposed to potential ‘transition’ policies that would prevent the ability to achieve the 35-storey height as contemplated in the emerging preferred option. This concern applies also to what policies, if any, may apply to lands within the NYCSP that may not redevelop in the near future.

In this regard, a number of legislative and policy changes have taken place in the last few years which we feel are germane to the development of such policies to be included within the future Amendment to the NYCSP, including:

- Legislative changes to the Planning Act, as enacted through Bill 23 (More Homes Built Faster Act (2022)) and Bill 185 (Cutting Red Tape to Build More Homes Act (2024)).
- The new Provincial Planning Statement, 2024 (“2024 PPS”) came into force on October 20, 2024. The 2024 PPS replaces both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020. The 2024 PPS is intended to be a streamlined province-wide land use planning policy framework that provides municipalities with the tools and flexibility in order to facilitate the development of at least 1.5 million homes by 2031.
- A much greater emphasis in this recent PPS directs planning authorities to promote the planning principles of intensification, compact form, transit supportive development forms and densities, that optimize the use of land, housing options and opportunities, and infrastructure, including public transit infrastructure, pedestrian friendly development, and efficient use of land, resources and public infrastructure. A key focus of these documents is for the provision of intensification surrounding existing and proposed higher order transit stations as a means to bring on more housing units.

- The 2023 City Council approved Housing Pledge aimed, to facilitate the construction of 285,000 new homes by 2031.

It is through this lens that we suggest the 'transition' policies to be contained within the future NYCSP are very important considerations as a means to support Provincial and Local policies aimed at promoting optimized intensification, through redevelopment, and increasing the supply of housing in a faster manner, particularly on lands very well serviced by existing higher order transit infrastructure.

We would be pleased to meet with the staff and Local Councillor to discuss our Client's plans for this site and its comments on the NYCSP Review in particular. 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 the undesigned.

Yours very truly,

**GOLDBERG GROUP**



Adam Layton, MCIP, RPP  
Associate Principal

cc. 83 Drewry Avenue Inc.  
85 Drewry Avenue Inc.