

By Email (teycc@toronto.ca)

May 25, 2026

City Clerk

Attn: Cathrine Regan, Administrator
Toronto & East York Community Council
Toronto City Hall
100 Queen Street West, 2nd Floor, West Tower
Toronto, ON M5H 2N2

Dear Ms. Regan,

**RE: "LIBERTY FOR ALL" SECONDARY PLAN REVIEW / PROPOSED SITE AND AREA
SPECIFIC POLICY
City-Initiated Request to Amend the Official Plan
Application Number 24-243976 STE 10 OZ**

We are planning consultants for CANADIAN MINI-WAREHOUSE PROPERTIES LIMITED/PS CANADA COMPANY ULC who own and operate the existing self-storage facility at 24 Jefferson Avenue. Our client's property is directly across the street from the currently under construction expansion of Exhibition Station and future terminus of the Ontario Line subway. It falls within the Exhibition Station PMTSA and is also a short walk from the King streetcar. The clear intent of the Liberty For All secondary plan review is to recognize Liberty Village as a major intensification node, and our client's property's is a prime candidate for the greatest level of potential development. In our opinion, one goal of Liberty For All should be to maximize development opportunities for sites such as our client's.

We have reviewed the Staff Recommendation report dated May 11, 2026, and its attachments, including the proposed draft Official Plan Amendment, and have the following comments:

- We support the recommended redesignation of the lands currently designated Regeneration to Mixed Use.
- We also agree with the need for the proposed New Liberty Street connecting Dufferin Street to Strachan Avenue but note that more information is needed

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regarding its exact ROW requirements and potential impacts upon our client's property.

- We note that despite the currently in-force Policy 8(a)(iii) of Area 3 of the North Garrison Common Secondary Plan which requires this new amendment to offer direction regarding maximum building heights, the draft OPA remains silent on this issue. In our opinion, such direction is important in better understanding the City's vision and to help guide future applications.
- Regarding Policies 2.2 & 2.5 of the draft OPA, we recognize that the new proposed minimum requirement that 15% of total GFA be non-residential uses is a substantial reduction from the 45% requirement in the currently in-force plan. However, we would like to better understand the origin of this new number, along with the proposed increase to 20% once the Ontario Line is fully operational. We wish to understand why the City feels it is necessary to maintain any minimum non-residential GFA requirement. We reserve the right to comment further.
- In our opinion Policy 2.7 of the draft OPA requires clarification. We do not understand the intended effect of this policy and how the City might implement it. Is this policy intended as a general value statement, or is it the intent of the City to require such uses within specific developments?
- Regarding Policy 3.1 of the Draft OPA, we note that a policy encouraging a greater share of dwelling units to be 2-bedrooms or more may be appropriate, but imposing a minimum requirement for 40% without regard to whether the market will support such a unit mix is not reasonable or appropriate. Requiring specific required minimums for 2 bedroom and 3+ bedrooms without regard to the market is likewise unreasonable. In our opinion, these specific requirements are more likely to hinder the plan's intensification goals – particularly when paired with the draft OPA's requirements for affordable housing and non-residential space.
- Regarding Section 3.4 and the draft OPA's requirements to provide a minimum amount of affordable housing, we recognize these policies have been carried forward from the currently in-force North Garrison Common Secondary Plan. However, in May 2025 the Province issued O.Reg 54/25 for Inclusionary Zoning which limited the amount of affordable housing that could be required within a

Protected Major Transit Station Area to a maximum 5% of the total number of units or 5% of the total GFA of all residential units (not including common areas). This same regulation also limited the period of time for which affordable housing units could be maintained as affordable within a Protected Major Transit Station Area to a maximum of 25 years. Section 3.4 needs to be amended to reflect this change.

- In our opinion, some of the language used regarding urban design and built form could be better crafted to be more permissive rather than restrictive. More specifically:
 - 4.2. Liberty Local Road, also known as Liberty New Street, will provide an additional east-west corridor in and out of Liberty Village, and should be designed as a promenade, improving mobility, including walkability and cycling. A dog run may be considered adjacent to the rail corridor. Any redevelopment that fronts Liberty Local Road will, ~~as appropriate where~~ appropriate, provide active retail uses at grade, such as restaurants and cafes, with spill-out activities such as patios.
 - 5.3.1 Midblock connections provide direct, legible, continuous and connected public access through blocks and should be: [...]
 - c) barrier-free, signed and well-lit with pedestrian-scale lighting and clear sight lines where possible for public safety;
 - d) lined with active uses, such as retail or units with home occupation where possible; [...]
 - 9.1 Development should: [...]
 - c) ~~set base building heights that align with the scale and height of neighbouring streetwalls;~~ Base-building heights should complement adjacent streetwalls. Varied heights, where appropriate, are encouraged to reinforce existing conditions, providing vertical rhythm and visual interest; [...]
- The protection of the heritage character of Liberty Village is an important policy direction, and the specific retention and adaptive re-use of heritage buildings is a clear policy imperative. However, in our opinion, it may not always be possible or technically feasible to satisfy all the policies of Section 8 of the draft OPA which

are crafted as requirements rather than directions. We offer the following modifications to Policies 8.2 & 8.3 which we believe are more appropriate:

- 8.2. Development on and adjacent to heritage properties will require a site-specific approach that conserves their cultural heritage value wherever reasonably possible and achieves a contextually appropriate solution, ~~including,~~ which may include but not be limited to, adaptive re-use and the use of additional setbacks and stepbacks to maintain the prominence and three-dimensional integrity of the heritage resource(s).
 - 8.3. ~~Enhance-t~~The heritage character of the cultural heritage landscape should be enhanced through the appropriate design of new development and the public realm and may incorporate interpretive and commemorative elements that are informed by the history of the area, including workers' history, labour activism and the adaptive reuse of the area by artists and creative communities, where possible.
- Regarding Section 9.1(d), we believe the policy direction to locate new building masses away from existing heritage buildings to encourage whole building retention is not reasonable or perhaps even possible, particularly on challenging, crowded, and constrained sites like our client's property. The retention of heritage assets must always be balanced against other important planning directives such as ensuring good design, tower placement, and maximizing new housing and employment opportunities, as well as simply making sure a development is financially viable.

We trust this helps. We also ask to be notified of any future meetings and/or decisions regarding the Liberty For All planning review.

Yours very truly,



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