



May 27, 2026

Toronto and East York Community Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of Community Council:

Re: *Liberty for All Regeneration Area Study – Final Report*
Item TE33.10 – Toronto and East York Community Council (May 28, 2026)
1179-1189 King Street West, 67-87 Mowat Avenue, 70-80 Fraser Avenue,
and 100-108 Liberty Street

We are the planning consultants for 2396927 Ontario Inc., with respect to the lands at 1179-1189 King Street West, 67-87 Mowat Avenue, 70-80 Fraser Avenue, and 100-108 Liberty Street (the “subject site”).

The subject site is bounded by King Street West to the north, Mowat Avenue to the west, Liberty Street to the south and Fraser Avenue to the east. The subject site, known as the “Toronto Carpet Factory”, is located within Liberty Village and is comprised of seven buildings designated under Part IV of the *Ontario Heritage Act* spanning the city block, a surface parking lot on the southeast corner of the block, and a network of pedestrian mid-block connections throughout the site.

We have been monitoring the ongoing Liberty for All Regeneration Area Study since 2024. As part of this process, we submitted a letter to City staff in May 2025, which provided our comments on components of the Study shared at the City’s landowners meeting (March 2025) and the first Community Consultation Meeting (April 2025). Following the second Community Consultation Meeting and Design Review Panel presentation (November 2025), we submitted a second letter in March 2026 in response to the draft policies. These two letters have been attached as **Attachment 1**.

We have further reviewed the draft Garrison Common North Secondary Plan Site and Area Specific No. 3 policies attached to the May 11, 2026 staff report, which will be considered by Toronto and East York Community Council on May 28, 2026 (Item TE33.10).

We want to thank staff for their collaborative efforts throughout the Regeneration Area Study process. While we appreciate the revisions made by City staff, we continue to have concerns with some of the draft policies, specifically with respect to land use,

housing, public realm, views, and heritage, as expressed in our previously submitted letters. These are summarized below.

1. Land Use

While we appreciate that the non-residential gross floor area (“GFA”) requirement has been reduced from 45% to 15% (and 20% following the Ontario Line being operational to Exhibition Station), we continue to have concerns with the proposed land use policies.

Draft Policy 2.1(b) provides that development should demonstrate that non-residential GFA is both “maintained and enhanced”. This language may suggest a requirement for non-residential replacement on an individual site basis and should be revised or deleted given the policy direction in Section 2.2 that focuses instead on a minimum percentage.

In this regard, while the draft language in Policies 2.3 and 2.4 provides that the City may reduce minimum requirements for the provision of affordable housing or non-residential uses, we request that greater certainty be provided that that staff would be able to reduce minimum requirements if certain components are met (i.e. that the requirements will be reduced if alternative non-residential uses or affordable housing are provided).

For those reasons, and those set out in our previous letters, Policy 2.5, which would increase the minimum non-residential GFA requirement to 20% upon completion of the Ontario Line, is also of concern.

It continues to be our opinion that the land use policies should be sufficiently flexible to permit a mix of uses that appropriately responds to the built form and market conditions. For the reasons stated in our previous letters, the inclusion of a non-residential GFA requirement is restrictive and does not account for both the current and future market realities.

2. Housing

Proposed Policy 3.1 requires a minimum 40% two- and three-bedroom units for developments containing more than 80 new residential units. This is new policy direction that was not in the materials previously presented. We request that more flexibility be included in this policy by instead requiring a minimum of 15% two-bedroom units and 10% three-bedroom units, and an additional 15% as a combination of two- and three-bedroom units, including units that can be converted to two- and three-bedroom units through the use of accessible or adaptable design measures.

This is similar to the policies of the Downtown Secondary Plan (see Policy 11.13) and Yonge-Eglinton Secondary Plan (see Policy 7.1.c).

With respect to affordable housing, we continue to have concerns with the proposed policies for the reasons set out in our previously submitted letters. In our opinion, the affordable housing terms should follow those set out in the Provincial regulation that governs Inclusionary Zoning, where it is applicable. An alternative or additional policy requirement could include the provision of affordable housing through in-kind Community Benefit Charge (CBC) contributions.

3. Public Realm – Mid-Block Connections

With respect to the policies on mid-block connections, we recommend that proposed Policy 5.3.1 be revised from “should be” to “are encouraged to be” to provide more flexibility to consider site-specific considerations, for the reasons set out in our March 2026 letter, while achieving the intent of the policy.

4. Views

We continue to have concerns with policies related to views, as expressed in our previously submitted letter. It is unclear what the policy language “should be considered in development and, where possible, enhanced” means and how this will be implemented. In our opinion, this language may have unintended impacts on potential built form and heights.

5. Heritage

Proposed heritage policies provide that development on or adjacent to “heritage properties” will require a site-specific approach that conserves their cultural value and achieves contextually appropriate solutions.

While the subject site includes a designated heritage building, we have concerns with the general principle that all properties identified as “built heritage features” on Map 8: Cultural Heritage Landscape Map be treated as “heritage properties”, regardless of whether they have been designated or listed, or merely identified as properties that have potential heritage value, to be confirmed one way or the other through a Cultural Heritage Evaluation Report (CHER).

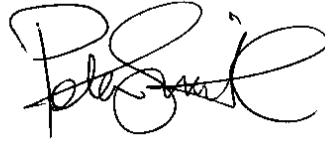
Thank you again for the opportunity to provide these comments.

Yours very truly,

Bousfields Inc.



Mike Dror, RPP, MCIP



Peter F. Smith, RPP, MCIP

cc: *client*

Attachment 1:
March 25, 2026 and May 2, 2025 Letters



March 25, 2026

George Pantazis, Senior Planner
Development Review Division
Community Planning, Toronto & East York District
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Dear Mr. Pantazis,

**Re: *Liberty for All Regeneration Area Study
Comments for Consideration
70-90 Fraser Avenue, 100-108 Liberty Street, 67-87 Mowat Avenue and
1179-1189 King Street West, Hullmark Developments Ltd.***

As you are aware, we are the planning consultants for Hullmark Developments Ltd., with respect to the lands at 70-90 Fraser Avenue, 100-108 Liberty Street, 67-87 Mowat Avenue 1179-1189 King Street West (the “subject site”).

The subject site is bounded by King Street West to the north, Mowat Avenue to the west, Liberty Street to the south and Fraser Avenue to the east. The subject site, known as the “Toronto Carpet Factory”, is located within Liberty Village and is comprised of seven buildings designated under Part IV of the *Ontario Heritage Act* spanning the city block, a surface parking lot on the southeast corner of the block, and a network of pedestrian mid-block connections throughout the site.

As you are also aware, we have been monitoring the ongoing Regeneration Area Study since 2024. The purpose of this letter is to provide additional comments on the emerging directions from the ongoing study coming out of the Design Review Panel session on November 19, 2025 and the second round of Community Consultation Meetings in November 2025.

This letter builds on the comments found in our previous letter to you dated May 2, 2025, which has been attached for your convenience as **Attachment 1**. While we continue to support the overall direction of the Liberty For All Plan and are excited to see the final outcomes of the Study, we have some additional comments and questions based on the recent Design Review Panel presentation and Community Consultation Meetings that relate to land use, mid-block connections, built form, community services and facilities, affordable housing, parks and POPS, heritage, and general language of the draft policies.

Additional Comments and Questions on the Liberty For All Study:

- **Land Use – Non-Residential GFA Requirement:** We understand that the City has retained N. Barry Lyon Consultants (NBLC) to conduct the economic study, which is targeted to be completed in March 2026. While we are generally supportive of the idea of providing a mix of uses in Liberty Village, we continue to request that the 45% non-residential gross floor area (“GFA”) requirement that was included in the settlement of Official Plan Amendment No. 231 (“OPA 231”) be reduced and/or that flexibility be provided to enable the non-residential requirement to be satisfied in a variety of different ways.

It is also important to emphasize that, in addition to market considerations, there are practical/functional limitations to achieving a substantial percentage of non-residential GFA as part of new tall building development. While non-residential uses can typically be achieved on the lower floors of buildings, upper-level non-residential space is more difficult to achieve, particularly in the absence of a strong office market. The requirement for a specific non-residential percentage can therefore act as a disincentive to creating more housing because additional residential GFA triggers the requirement for additional non-residential GFA. In the worst case, if the percentage is set too high, it could make redevelopment uneconomic, contrary to the planning objectives for regeneration of the area, transit-supportive intensification and creation of new housing supply.

As a technical matter, we note that the presentation package shared at the November 18th and 20th Community Consultation Meeting indicated that “Economic Development staff have advised NBLC that Liberty Village accounts for 15% of the City’s total jobs”. This is incorrect - the percentage is in fact less than 1%. The City’s Employment Survey 2024 indicates a total of 1,600,300 jobs, of which 13,340 are located in Liberty Village (or about 0.8%).

In summary, we recommend that this policy be modified to an “encouragement” policy to allow for additional market flexibility, that the required percentage be reduced and/or that flexibility be provided to enable the non-residential requirement to be satisfied in a variety of different ways.

- **Mid-Block Connections:** We recommend that the provision of identified mid-block connections be encouraged, rather than required, to permit flexibility in their implementation in creative ways that are characteristic of Liberty Village.

In addition, the draft policy provides that mid-block connections should be soft landscaped where possible to contribute to the microclimate. While some soft

landscaping may be appropriate in mid-block connections, we would recommend *encouraging* soft landscaping, rather than requiring it “where possible”, as mid-block connections serve various purposes, including pedestrian circulation, pedestrian spillover space and activation zones for active uses (e.g. patios), among other things.

Furthermore, the draft policy provides that mid-block connections should be generally 6 metres in width. We would recommend including some flexibility in the policy language, recognizing that the siting of existing heritage buildings may constrain the widths of proposed mid-block connections.

- **Public Parks and POPS:** We recognize and appreciate that the “future potential for Privately-Owned Publicly Accessible Open Space” locations previously shown has been removed from the subject site, as requested.
- **Built Form – Views:** We have concerns about the draft policies related to maintaining and enhancing views identified on the slide titled “Built Form – Views”, which have the potential to limit renewal of some properties, including the subject site, in bullets a) through c). Requiring that identified views be maintained may result in trade-offs between preserving the aesthetic condition of existing buildings over other important city-building goals such as intensification surrounding major rapid transit investments (e.g. Exhibition GO and future Ontario Line station, King-Liberty GO, etc.).

In our opinion, any view policies in the Secondary Plan/SASP should be flexible to allow for the balancing of priorities on a site-specific basis, without the need for an Official Plan Amendment.

- **Community Services and Facilities:** We would like to review the City’s draft Community Services and Facilities Study when it is available, as we are interested in what community facilities the City has determined are most needed, including their sizes and optimal locations.

The draft policies note that “community services and facilities shall be provided in the first phase of any phased development” (our emphasis). In our opinion, the proposed policies should provide some flexibility as there may be a scenario where this is not feasible, particularly in the Liberty Village context that includes many other objectives, such as heritage conservation.

- **Affordable Housing:** As expressed in our previous communications, it continues to be our opinion that, despite the affordable housing requirements included in the OPA 231 settlement, inclusionary zoning (IZ) and/or the Community Benefit Charge (CBC) should be the mechanisms through which

affordable housing is achieved. If the City considers it necessary to refer to affordable housing in the Secondary Plan/SASP, it could speak to the applicability of IZ as a mechanism to secure affordable housing, and could also encourage securing affordable housing as an in-kind CBC contribution.

We note that the Province has further amended its IZ regulation (O. Reg. 232/18) through O. Reg. 15/26 to pause the application of IZ in Toronto, exempting developments with OPA/rezoning applications filed prior to July 1, 2027. While we recognize the importance of delivering affordable housing, the proposed affordable housing requirements are not aligned with the development industry's ability to deliver housing in the current challenging housing market.

- **Heritage:** We are supportive of the site-specific approach to heritage conservation for new development on properties with cultural heritage value.
- **Mobility:** We would like to reiterate that Liberty New Street is a needed improvement, in order to provide an additional east-west connection. On behalf of our client, we strongly encourage the city to advance its implementation expeditiously.
- **General Comment on Draft Policy Language:** Instead of including prescriptive language (i.e. words like "must", "will", "shall"), we recommend that the Secondary Plan/SASP consider incorporating a level of flexibility in language (i.e. "encourage", "where possible", etc.) to avoid unnecessary site-specific Official Plan Amendments.

For example, suggested revisions to the draft policies related to built form and streets and sidewalks are red-lined below:

Mid-Block Connections:

- *New publicly-accessible midblock connections will be ~~secured~~ encouraged through....*

Built Form Draft Policies

- *Development should*
 - a) provide a variety of building types, heights and site configurations especially on blocks that can accommodate multiple buildings;*
 - b) have towers in a north-south orientation to limit shadow impacts on the public realm, ~~where appropriate~~;*
 - c) have base building heights that ~~generally~~ align with the scale and height of neighbouring streetwall heights.*

Streets and Sidewalks Draft Policies

- Sidewalks and boulevards as described in Policy 3.1.1.13 in the Official Plan will be ~~designed~~ encouraged to achieve a minimum width of 6 metres.
- All new development will be encouraged to increase tree canopy in Liberty Village, including...

Mobility Draft Policies

- Due to Liberty Village's enclosed environment and limited road space, new development ~~must provide, where feasible,~~ should provide, where feasible and appropriate, pick-up and drop-off activity, including ride-share and deliveries, on-site and off-street and ~~must~~ should recommend transportation demand management measures, where appropriate.

Thank you for your consideration of these comments. We look forward to engaging in further discussions with staff as the draft Secondary Plan/SASP evolves.

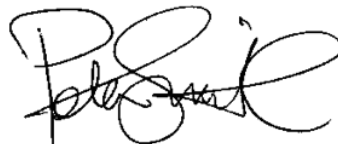
If you require any clarification or wish to discuss these matters further, please do not hesitate to contact the undersigned or Joie Kwong of our office at (416) 947-9744.

Yours very truly,

Bousfields Inc.



Mike Dror, RPP, MCIP



Peter F. Smith, RPP, MCIP

cc: Charles Arbez, Hullmark Developments Ltd.



May 2, 2025

George Pantazis, Senior Planner
Development Review Division
Community Planning, Toronto & East York District
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Dear Mr. Pantazis,

***Re: Liberty for All Regeneration Area Study
Comments for Consideration
Hullmark Developments Ltd.***

We are the planning consultants for Hullmark Developments Ltd., with respect to the lands at 1179-1189 King Street West, 67-87 Mowat Avenue, 70-80 Fraser Avenue, and 100-108 Liberty Street (the “subject site”). The subject site is bounded by King Street West to the north, Mowat Avenue to the west, Liberty Street to the south and Fraser Avenue to the east.

As you are aware, we have been monitoring the ongoing Regeneration Area Study since 2024, including attending the City’s recent landowner meeting on March 12th, 2025 and the Community Consultation Meeting on April 2nd, 2025, where components of the proposed Secondary Plan were presented.

The purpose of this letter is to provide comments on the emerging directions from the ongoing study. We have some questions and concerns that relate to the required non-residential gross floor area requirements, height-related policies, use of the holding provision related to Liberty New Street, community services and facilities policies setback requirements for heritage buildings, and the Liberty Village Public Realm Strategy plan.

Background

On February 12, 2025, our client shared preliminary drawings for a mixed-use infill concept with City staff and received preliminary comments by email the same day. A formal Pre-Application Consultation (“PAC”) meeting has been requested and is currently being scheduled.

Proposed Regeneration Area Study Comments

We have reviewed the materials provided in advance of the landowner meeting (particularly the presentation dated March 12, 2025) and have the following key questions and concerns about the emerging directions of the Study:

1. Non-Residential Requirement

The proposed 45 percent non-residential gross floor area (“GFA”) requirement reflects the details of the settlement of Official Plan Amendment No. 231 (“OPA 231”). Although the current development concept would satisfy the non-residential GFA requirement, it is our opinion that the minimum requirement should be reduced as a matter of appropriate land use planning policy.

The 45 percent figure resulted from a negotiation in the context of the appeal of OPA 231 that was filed in 2014, which had proposed a non-residential component of 70 percent based on the market conditions at that time, over 10 years ago. Recognizing the dated nature of the appeal, the City was ultimately willing to reduce that percentage in the context of settling the appeal. However, it was recognized that that percentage was not forward-looking and that there would be the opportunity to revisit that percentage in the context of the new Secondary Plan.

In that regard, Policy 6(iii) of Site and Area Specific Policy 3 (SASP 3) to the Garrison Common North Secondary Plan, as approved through the OPA 231 settlement, provides that amendments to the minimum 45 percent non-residential gross floor area requirement in Policy 6(i) may be considered and incorporated into the adopted Secondary Plan or Community Planning Permit System in order to implement any conclusions, findings and/or recommendations of current or future City studies that are appropriate for the area.

It is our opinion that non-residential GFA requirement policies in the proposed Secondary Plan must be flexible and recognize market realities of today. As acknowledged by the City’s Office Needs Study, there has been a fundamental and ongoing shift across the globe since the outset of the COVID-19 pandemic in 2019; as a result, the ways in which local businesses and their employees are using office spaces continues to evolve materially. As noted in the study, new real estate developments of all kinds have become increasingly challenged by rising interest rates, heightened construction costs and evolving municipal and provincial policy contexts. Since then, additional challenges such as trade tariffs and other international forces have arisen that may further compound this issue.

As such, although the latest development concept plan is currently contemplating 45 percent non-residential GFA, it is likely that the uses may evolve over time as the campus develops. In principle, there is a significant challenge associated with the provision of 45 percent of non-residential space; accordingly, flexibility must be provided through either a significantly reduced percentage of required non-residential GFA or in how the 45 percent non-residential GFA might be met, in order to ensure that development is viable. In this regard, a scan of other recent non-residential policies adopted and proposed by the City in similar circumstances indicates that a percentage of 15 percent is typical.

We appreciate the fact that staff are taking a realistic approach and have expressed willingness to accept flexibility in exchange for a reduced amount of non-residential GFA. In addition to the ideas presented by City staff, which include the provision of affordable housing, cash-in-lieu, cultural and art uses, and community services and facilities, some other potential ideas include:

- providing a larger percentage of 2- and 3-bedroom family-sized units, beyond what is recommended in the Growing Up Guidelines;
- provision of Publicly-Accessible Privately-Owned Spaces (POPS);
- provision of other public realm improvements including contributions to the implementation of elements of the Liberty Village Public Realm Strategy;
- cash contributions toward other City objectives in the neighbourhood;
- additional on-site or off-site heritage conservation and commemoration within Liberty Village; and
- provision of alternative Green P Parking opportunities to, for example, replace the parking being displaced by the planned park at 34 Hanna Avenue.

Our client welcomes further discussion on the implementation of these alternatives in exchange for non-residential gross floor area.

The carefully considered implementation of the new *Regeneration Areas* designation has the potential to unlock new housing in this transit-rich neighbourhood along with achieving other city-building goals. We expect that the currently contemplated 45% approach, with a minimum of 51% of those uses being *Core Employment Areas* uses, will discourage both.

2. Community Services & Facilities and Parkland

We understand that City staff are currently undertaking a Community Services and Facilities study as part of the Regeneration Area study. We look forward to receiving input from that study, as it may potentially help frame policies related to non-residential gross floor area requirements.

3. Height-Related Policies

We are supportive of the direction City staff are taking to allow for height to be determined on a site-specific basis through Zoning By-law amendment applications. However, we have comments related to the potential shadow impact policies that may be included in the proposed Secondary Plan. It is our opinion that if shadow policies are included within the draft secondary plan, they should not be based on a “no net-new shadow” test but rather on a test that is more in keeping with Official Plan Policy 3.2.3(3) that focuses on preserving the utility of parks.

Shadow-related policies, if included in the proposed Secondary Plan, should allow for an appropriate balancing of intensification objectives to provide additional housing in proximity to frequent and higher-order transit, given its location within two major transit station areas.

While it is recognized that the Allan A. Lamport Stadium (“Lamport Stadium”) could be repurposed as a park in the future, the park area currently consists of a surface parking lot at the south end, unprogrammed green space along the Jefferson Avenue and Fraser Avenue street frontages, and the stadium itself at the north end. Furthermore, the RFP issued for Lamport Stadium indicates that the stadium use is intended to continue to exist. The current and planned stadium uses are not particularly shadow sensitive, and as such, proposed shadow related policies should be qualitative and allow for a balancing of objectives within the Secondary Plan.

4. Setbacks from Heritage Buildings

Staff had indicated that heritage policies would include a required 10 metre tower stepback from heritage buildings along Liberty Street and a 5 metre tower stepback along all other streets. In our opinion, the depth of the tower stepbacks should be informed by a Heritage Impact Assessment assessing the specific heritage buildings on site, as well as site-specific urban design considerations.

In our opinion, the inclusion of prescriptive numerical standards would blur the relationship between policy and regulation. In my opinion, it is important for the Official Plan to articulate the rationale and objectives associated with a vision

(the “why”) rather than how that vision is achieved and regulated (the “how”), leaving the regulation of built form to the zoning by-law.

Given the variety of built form conditions along Liberty Street, a 10 metre stepback may not be appropriate or practical on all sites and there may not be a clear heritage basis for requiring a depth of 10 metres. Providing instead for direction that an appropriate setback be provided that is informed by a Heritage Impact Assessment would provide for a more flexible approach that allows for creative responses and context-specific development solutions to better implement the objectives of the Secondary Plan.

5. Holding Provision related to Liberty New Street

The basis for the use of a holding provision related to the completion and operation of Liberty New Street is unclear, given our understanding that the lands required for Liberty New Street have already been acquired through Metrolinx’s expropriation of lands as part of the Ontario Line. We have not seen any technical work that would suggest that there is a need for the use of a holding provision for capacity reasons in advance of the implementation of Liberty New Street. Further information needs to be provided regarding the financing, timing and implementation of Liberty New Street.

6. Public Realm Strategy

We understand that staff intend to translate elements of the Liberty Village Public Realm Strategy into the Secondary Plan, where appropriate. In consideration of the future redevelopment potential of the block, it is our opinion that the two proposed locations for “potential for privately-owned publicly accessible open space/enhancement” as shown on the Public Realm Structure Plan in the Liberty Village Public Realm Strategy should be removed.

Instead, the team’s vision for the subject site development involves infilling the existing surface parking areas along the street edges on Liberty Street and Fraser Avenue with new buildings to extend the street wall and to define the internal laneway network. In our opinion, a continuous street wall would be preferable to breaking up the street wall with a POPS, particularly given the location of the site opposite the open space associated with the Allan Lamport Stadium/park. Instead, given our focus on the internal laneway system as part of the public realm enhancements, we would suggest that the public realm strategy show the potential expansion of the laneway network on the subject site by providing additional covered pathways. The “future potential mid-block connection” locations are conceptually illustrated in **Attachment 1**.

Thank you for your consideration of these comments. We look forward to engaging in further discussions with staff as the draft Secondary Plan evolves.

If you require any clarification or wish to discuss these matters further, please do not hesitate to contact the undersigned.

Yours very truly,

Bousfields Inc.



Mike Dror, RPP, MCIP

Peter F. Smith, RPP, MCIP

cc: Charles Arbez, Hullmark Developments Ltd.

Fig. 1 Proposed Modifications to Public Realm Structure Plan

For Discussion Purposes

Project No.
16185-1

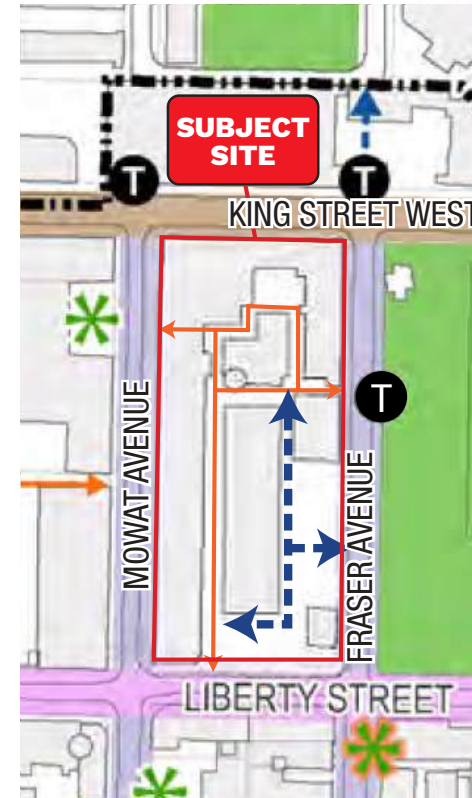
Date
April 29, 2025

Address
1179-1189 King Street West, 67-87 Mowat Avenue, 70-80 Fraser Avenue, and 100-108 Liberty Street

- Legend**
- Study Area
 - Existing Parks
 - Existing Privately-Owned Publicly Accessible Open Space / Enhancement
 - Potential for Privately-Owned Publicly Accessible Open Space / Enhancement
 - Potential for Tree Planted Curb Extension with Open Space/Enhancement
 - Potential for Future Parks / Privately-Owned Publicly Accessible Open Space
 - Existing Mid-block Connections
 - Planned Mid-block Connections
 - Future Potential Mid-block Connections: New connections or improvements to existing
 - Enhancement for Key Mid-block Connection
 - View Terminus
 - Major Gateway
 - Minor Gateway
 - Primary Spine Streets
 - Secondary Spine Streets
 - Village Streets
 - Village Streets - Planned
 - Village Streets - Potential
 - Residential Existing Streets
 - Arterial Streets
 - King Liberty Pedestrian Bridge
 - Exhibition GO Tunnel
 - Future Pedestrian and Cycling Bridge
 - Future Liberty New Street: 2022 schematic amended alignment
 - 2016 Environmental Assessment



Public Realm Structure Plan



Proposed Modifications to Public Realm Structure Plan