

**WESTON
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planning + urban design

PH19.1.20

City Planning
City of Toronto
55 John Street, 22nd Floor
Toronto, Ontario M5V 3C6

December 9, 2020
File 9756

Attn: Chair & Members of the Planning and Housing Committee

Dear Members of the Planning and Housing Committee:

**RE: OPA 483: Draft Keele Finch Secondary Plan &
OPA 482: Protected Major Transit Station Areas
Toronto City Council Item #PH19.1
Planning & Housing Committee Meeting 19
390 Sentinel Road, Toronto**

Weston Consulting is the planning consultant for the owners of 390 Sentinel Road, in the City of Toronto (herein referred to as the 'subject lands'), as identified on Figure 1 of this Letter. We have reviewed the proposed Official Plan Amendments 483 – Draft Keele Finch Secondary Plan and Official Plan Amendment 482 – Protected Transit Station Areas of Finch West Transit Station Area and Sentinel Transit Station Area. We have participated in previous Open Houses (including the session on November 9, 2020) and had discussions with Staff with respect to our client's lands and the implications of these two Amendment that resulted from the Keele Finch Plus Study. It is our understanding that City Council adopt OPA 482 and seek authorization for City Planning to obtain approval from the Ministry. Staff are also recommending City Council Adopt OPA 483 and that City Council hold Ministry authorization until OPA 482 is approved and confirmation that OPA 483 does not require and changes beyond stylistic and technical. These recommendations were forwarded to Planning & Housing Committee on December 8, 2020 and are being decided upon by City Council on December 16th and 17th 2020.

Description of Subject Lands and Surrounding Context

The subject lands are located on the southwest corner of Finch Avenue West and Sentinel Road. They are approximately 6,321 square metres (1.5 acres) in land area and are bound by Sentinel Road (east), Derrydown Road (south), Finch Avenue West (north) and single-detached dwellings along Derrydown Road and St. Wilfred's Catholic Church + Catholic School along Finch Avenue West (west).

The subject lands are within a 10-minute walk of the Finch West Subway Station and abut the future Sentinel Station associated with the Finch West Light Rail ("LRT") system.

The lands are currently occupied by two blocks of four storey stacked rental townhouses with rooftop amenity areas and vehicular access to the underground parking garage along Finch Avenue West. The primary and centralized pedestrian access for the two blocks is off Sentinel Road, and secondary from Finch Avenue West through the at-grade visitor parking. The subject lands have approximate frontages of 52 metres along Finch Avenue West, 120 metres along Sentinel Road, and 43 metres along Derrydown Road.

Proposed Draft OPA 482 SASP 585: Sentinel Protected MTSA

The Subject lands are proposed to be designated within the *Sentinel Transit Station Area* as identified in draft OPA 482 and SASP 585. This area has a planned minimum population and employment target of 160 residents and jobs combined per hectare to be achieved collectively within the Sentinel Transit Station Area. Weston consulting does not object to the subject land's proposed Gross Development Block's prescribed minimum density of 2.0 FSI and the minimum population and employment targets that are required to leverage the existing and planned infrastructure within the Sentinel MTSA. We are supportive of the planned minimum population and density targets proposed within OPA 482, and recommend that these targets be translated into the site and area specific development framework proposed within OPA 483.

Proposed Draft OPA 483: Keele Finch Secondary Plan

In accordance with Map 2 – Area Structure of the Secondary Plan, the subject lands are proposed to be included in the *Sentinel Node* and are highly accessible to existing and planned higher order transit. Nodes are identified as “compact areas where more intense density and activity will occur”. The Sentinel Node is identified in the Secondary Plan as a “community destination” and a “community focal point [that] offer[s] local residents economic opportunities with incubator spaces”, and an area that provides opportunities for “*residential intensification, along with new or improved community facilities, and neighbourhood-serving shops and services*”.

The existing Finch Subway Station is within a 10-minute walking distance (800 metre radius) and the subject lands are located within a planned *Major Transit Station Area (“MTSA”)*, Sentinel Station, associated with the Finch West Light Rail Transit (“LRT”) line. The Station will abut the subject lands to the north and the proposed Secondary Plan identifies the opportunity for future built-form connections to the subject lands.

OPA 483 designates the subject lands as *Mixed Use Areas A* in their entirety per Map 3 of the Secondary Plan. This designation permits a range of uses, including, residential, office, hotel, retail and service uses, and has identified the subject lands as being within a “Tall Building” Zone, per Map 9 of the Secondary Plan.

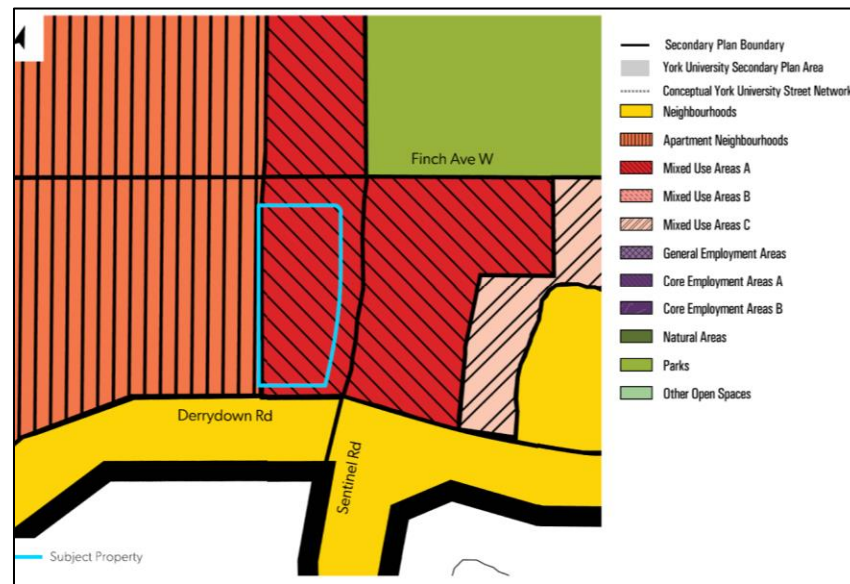


Figure 1 – Mixed Use Areas ‘A’ – Map 3 of Draft Secondary Plan

Areas in the Secondary Plan are structured to focus on “different types of development and level of intensity and scale toward appropriate areas – including near transit stations and stops [and] provides for appropriate transitions to lower-scale areas and compatible development within Keele Finch’s diverse *Neighbourhood Districts*”.

Map 4 of the proposed Secondary Plan plans for retail streets and ground-floor uses throughout the Plan Area. The Secondary Plan proposes that the majority of the property’s future development condition along the Sentinel Road and Finch Avenue West frontages require the implementation of ground-floor retail, restaurant and services uses. The Secondary Plan also encourages but does not require retail uses on the northwest corner of Derrydown Road and Sentinel Road. Although retail is not required, the Secondary Plan encourages the implementation of “small-scale retail uses” on the northwest corner.

Map 5 of the proposed Secondary Plan indicates that a POPS is proposed on the subject lands and streetscape improvements be secured as part of the development where possible. Setbacks and street walls are contained in Policy 7.1.12 and 7.1.15 respectively.

Map 8 – Minimum Heights of the proposed Secondary Plan identify the proposed minimum heights permitted on the subject lands. A minimum building height of 4 storeys is proposed throughout the subject lands.

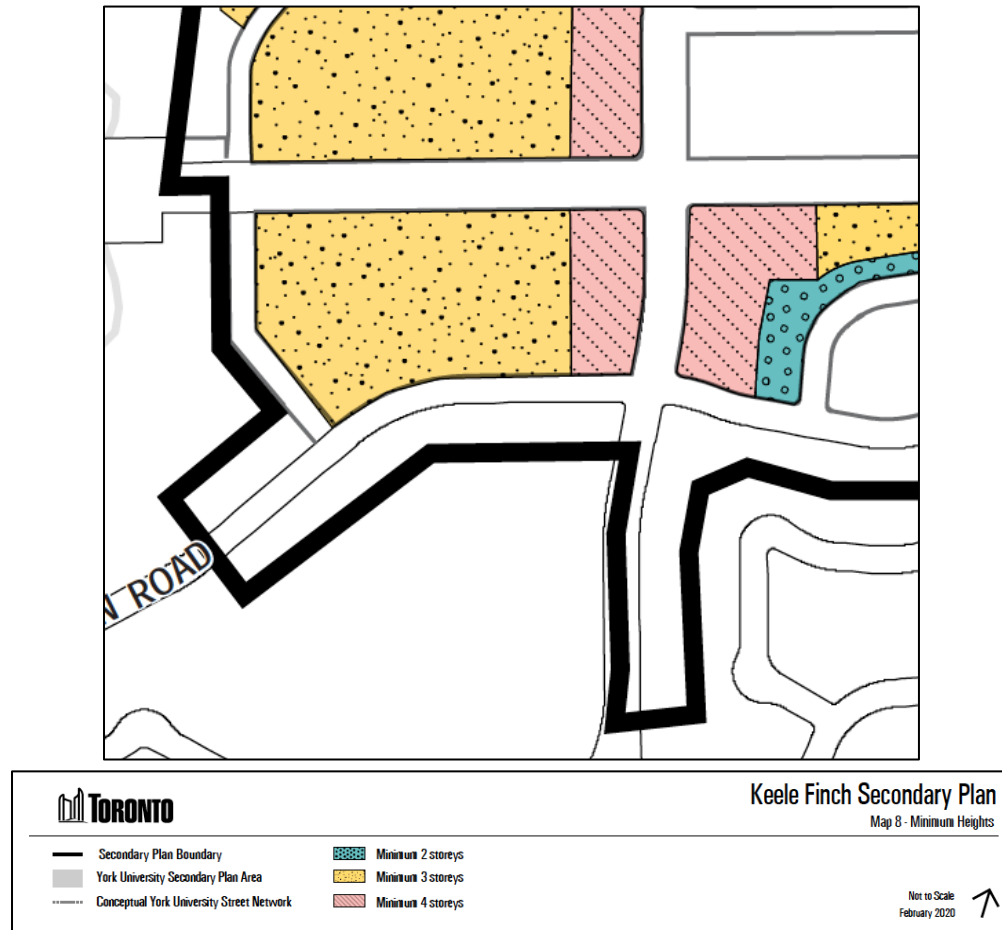


Figure 2 – Minimum Height – Map 8 of Draft Secondary Plan

Map 9 – Maximum Height Limits of the proposed Secondary Plan stipulates that the subject lands are to be split into three sections to accommodate tall, mid-rise and low-rise buildings. The tall portion of the subject lands have a proposed maximum height of 55 metres (approx.. 17-18 storeys). The tall-building portion of the subject lands are identified as a location of 'Additional Height Zone' with the potential to accommodate an increase in maximum building height up to 75 metres (approx.. 24 storeys). The mid-rise building portion of the subject lands are proposed to have a maximum height of 25 metres (approx.. 8 storeys). The low-rise building portion has a proposed maximum height of 9 metres (3 storeys).

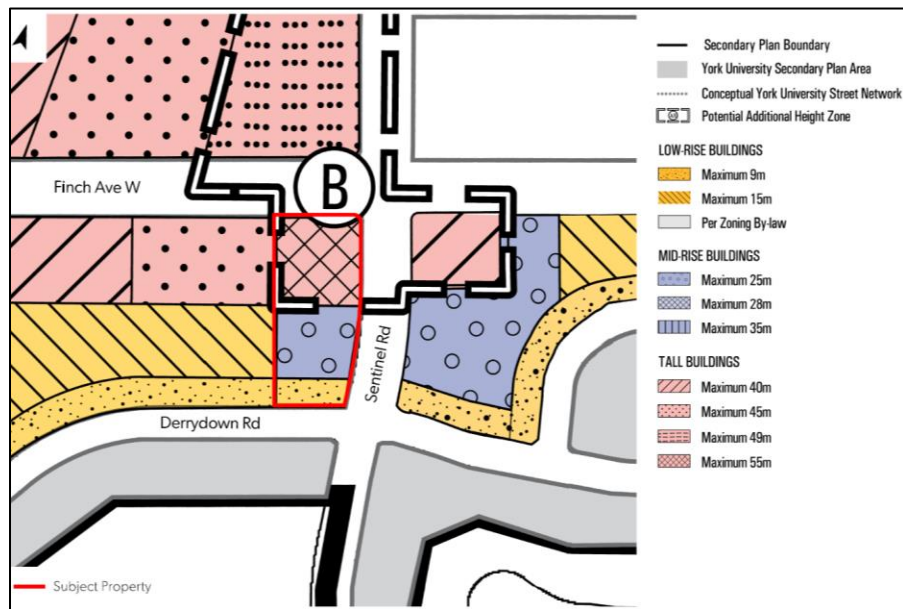


Figure 3 – Maximum Height – Map 9 of Draft Secondary Plan

Recommendations

1. As-built drawings for the Finch LRT Stations be shared with all landowners at the time of development application to ensure that seamless transition of development proposals and transit infrastructure are incorporated. As well, policies should be included which stipulate that properties are eligible for certain benefits if they include transit infrastructure linkage components into their design.
2. The Secondary Plan speaks to animated and active street, and an improved public realm along Finch Avenue and other streets by encouraging a mix of retail and service uses at grade. Map 4 and Policies 4.3 enforce these objectives and are therefore applicable to the subject lands. We support the implementation of retail and services uses as proposed, however, policies need to have some flexibility to accommodate for technical challenges in redevelopment. It is our recommendation that the use of “*required*” should be replaced with “*encouraged*” and that the numerical reference be removed.
3. Policy 7.1 contains site and urban design standards for all building. It is our recommendation that the City of Toronto develop architectural guides or urban design guidelines to guide the architectural language, materiality, setbacks and public realm rather than contained within the policies of the Official Plan Amendment. By having these items contained within policies, Official Plan Amendments are therefore required when a property cannot technically meet all design criteria. Therefore, urban design standards are more appropriate to be contained within Guidelines.

4. Policy 7.2.2 indicates that that low-rise buildings in the Derrydown Neighbourhood should only consist of single-detached, semi-detached and duplex dwellings with a maximum height of two storeys. This policy is inconsistent with Map 8, which confirms that minimum building height for the subject property is 4 storeys. This policy also does not allow for townhouses and low-rise apartments, which are permitted building types in the Neighbourhoods designation.
5. Policy 7.3 addresses minimum and maximum height. There is an inconsistency between Map 8 and Map 9. Map 8 confirms that the minimum building height for the south portion of the subject lands is 4 storeys. However, Map 9 confirms that that maximum building height is 9 meters which generally equates to 3 storeys. We support the findings of Map 8 and 4 storeys.
6. Furthermore, we acknowledge that minimum and maximum heights vary across the node and corridor. However, our client's property contains three different height maximums and three different building typologies. We support the principles of built form transition, however, there should also be flexibility across various boundaries of the height maximums. For example, there should be a policy which indicates that the boundaries between areas with different height maximums are approximate except when bisected by physical barriers such as roads and utility lines.
7. Policy 7.3.6.a outlines the subject lands' ability to apply the *Potential Additional Height Zone B* permissions, which only applies to the north portion of the subject lands, fronting Finch Avenue West and Sentinel Road. Under this policy, this portion of the subject lands are permitted to expand their maximum height permissions to 24 storeys (approximately 75 metres). We are supportive of this height bonusing policy; however, request the that the permissions extend farther south along the subject lands.
8. Policies 7.3.7 (a) and (d). imposes a development control that requires 15 per cent of the GFA of a building contain office, institutional and/or cultural uses. We do not have a concern with the prescription of these uses; however, we do have a concern with the rigidity of the policies minimum percentage of space required to be accommodated in each development should they apply the additional height permissions pursuant to policy 7.3.6(a). The 15 percent is a fixed amount and should not be fixed on the basis that the condition of the surrounding area's office, institutional and/or cultural uses are not static.

Summary

In the context of the concerns expressed over the proposed Secondary Plan Policies, we generally support the proposed designation of the subject lands to support planned intensification within the Sentinel Node, along Finch Avenue West and within the Keele Finch Secondary Plan Area. However, based on our review of the draft Secondary Plan and background materials, the Secondary Plan should be modified and certain policies deleted or more flexibility to permit efficient

development while achieving the City's objective of create a vibrant transit-supportive mixed use community.

We intend to continue to monitor the Secondary Plan process on behalf of our client on an ongoing basis. We kindly request to continue to be notified of any future reports and/or meetings regarding the Keele-Finch Secondary Plan process and request to be notified of any decisions regarding this matter.

Thank you for the opportunity to provide these comments. Please contact the undersigned should you have any questions regarding this submission.

Yours truly,

Weston Consulting

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Associate

cc. M. Gottried, Spring Hill Investments Inc.
Councillor Pasternak
Councillor Perruzza
Matt Armstrong, City Planning