

WESTON CONSULTING

planning + urban design

City Planning Division
North York Civic Centre
5100 Yonge St.
North York, Ontario
M2N 5V7

December 3, 2020
File 4923-3

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
Planning & Housing Committee Item #PH19.1
Planning Comments
1280, 1290 and 1300 Finch Ave West**

Recommendations

1. That the draft Keele Finch Secondary Plan before the Planning and Housing Committee be modified as follows:
 - a. That the proposed public road identified as #9 on Map 6 be removed;
 - b. That Policy 6.2.2 be modified to permit the consideration and approval of a private road to serve future development;
 - c. That the boundary between Mixed-Use Area A and Mixed-Use Area B be shifted east as described in the discussion below; and
 - d. That the risk assessment policies in Section 4.2.5 be deleted or, at a minimum, that the detailed studies be identified and that criteria be shared with neighbouring landowner as to what would be acceptable outcomes for these undefined studies.

Background

Weston Consulting are the Planners for the owners of a significant proportion of the properties located at 1280, 1290 and 1300 Finch Ave in the City of Toronto (See Figure 1). The landowners have been active participants in the Keele Finch Plus planning process and have provided input to City staff on the proposed planning framework and the future development of these lands. We have reviewed the draft Keele Finch Secondary Plan that is to be presented to the Planning & Housing Committee at their meeting of December 8, 2020 and have the following comments and recommendations on the draft Secondary Plan.

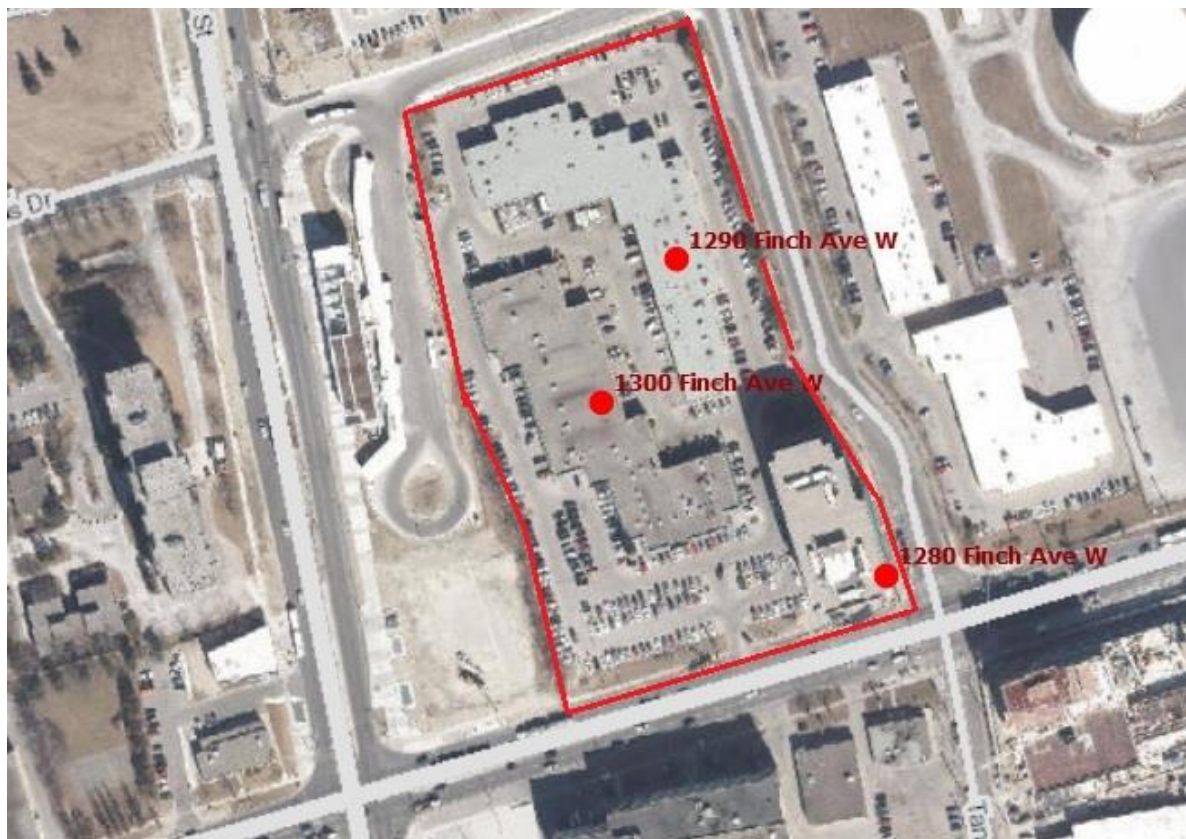


Figure 1 – 1280, 1290 and 1300 Finch Ave Aerial

Transportation Network

Map 6 – Public Street Plan in the draft Keele Finch Secondary Plan proposes a new public street connecting Tangiers Rd and Finch Ave West (see Figure 1). We have reviewed the background material available on the City’s website for the Keele Finch Plus public process and are not able to find any technical justification for the new public street.

Currently, Tangiers Rd services the local area and diverts traffic from the Keele/Finch intersection. Westbound traffic on Finch Ave that wishes to go northbound on Keele can bypass the main intersection using Tangiers Rd. The same goes for southbound traffic on Keele that wishes to travel eastbound on Finch Ave. Since light-rail transit is anticipated along Finch Ave in the Secondary Plan, we anticipate that there will be a full median on Finch Ave from Keele St to Tangiers Rd. in the future that will restrict traffic movements.

The proposed public street, shown as #9 on the draft Secondary Plan mapping (see Figure 2), does not seem to serve any functional purpose for neighbourhood traffic as follows;

- Southbound traffic on Tangiers have access to a full-moves signalized intersection at Finch. Using the new public road would provide little benefit;
- Northbound traffic on Tangiers will not use the proposed public street;

- Westbound traffic on Finch will likely be restricted from making a northbound turn onto the proposed public road given the likelihood of a median being installed in the future. This traffic will use the signalized intersection at Finch Ave and Tangiers Rd; and
- Eastbound traffic on Finch will likely not use the proposed public street.

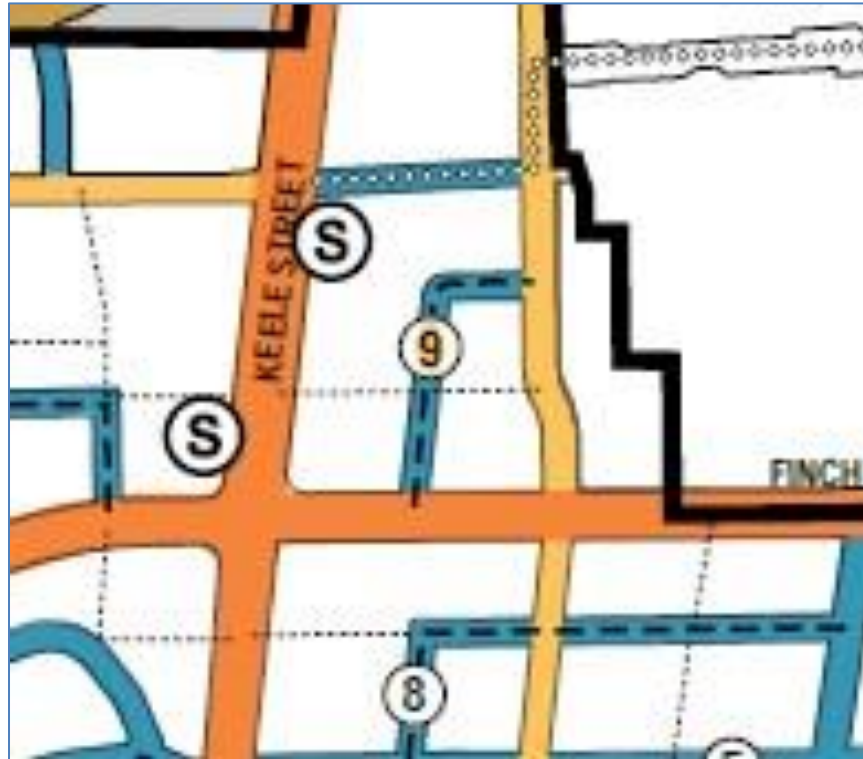


Figure 2 - Map 6 - Public Street Plan Excerpt

Given this, the primary purpose for the proposed public road will be to service new development that takes place in the north-east quadrant.

Development of the subject lands can also be achieved through a private road network. This is a common occurrence especially in high-density developments where underground parking is required. A private road network provides greater flexibility for the efficient development of the subject lands while integrating with the public street network through connectivity and public access easements.

Policy 6.2.2 of the draft Secondary Plan provides flexibility on the “*exact location, alignment and design*” of the proposed public street but not on whether future development is better served by a public or a private road. Similar to Policy 6.2.5, we propose that the following wording be added to Policy 6.2.2:

“Where it is determined that a new road connection is not required as a public street by the City, a publicly-accessible mid-block connection, laneway or other type of connection will be provided to improve access in and through the area”.

Land Use Designations

The City of Toronto Official Plan designates the subject properties as *Mixed-Use* on Map 2 – *Urban Structure* and *Mixed-Use Areas* on Map 16 – *Land Use*. Section 4.5 of the Official Plan states that “*Mixed-Use Areas will absorb most of the anticipated increase in retail, office and service employment in Toronto in the coming decades as well as much of the new housing.*” Thus, the subject lands are intended to absorb a wide range of land uses, including residential land uses.

The subject properties are also within a *Major Transit Station Area* as defined in the Place to Grow Plan. These policies reinforce the requirement for providing increased densities of residential development within the *Major Transit Station Area* to support the transit infrastructure. Thus, the subject properties are a prime location for high-density residential development in support the Places to Grow Plan.

The draft Secondary Plan designates the north-east quadrant as follows: *Mixed-Use Area A* fronting onto Keele St and *Mixed-Use Area B* fronting onto Tangiers. The primary difference between the two land use designations is that *Mixed-Use Area A* permits residential uses whereas *Mixed Use Area B* does not. The draft Secondary Plan uses these land use designations to provide a buffer between residential land uses and the heavy industrial land uses, specifically fuel storage tanks, found in the north-east quadrant.

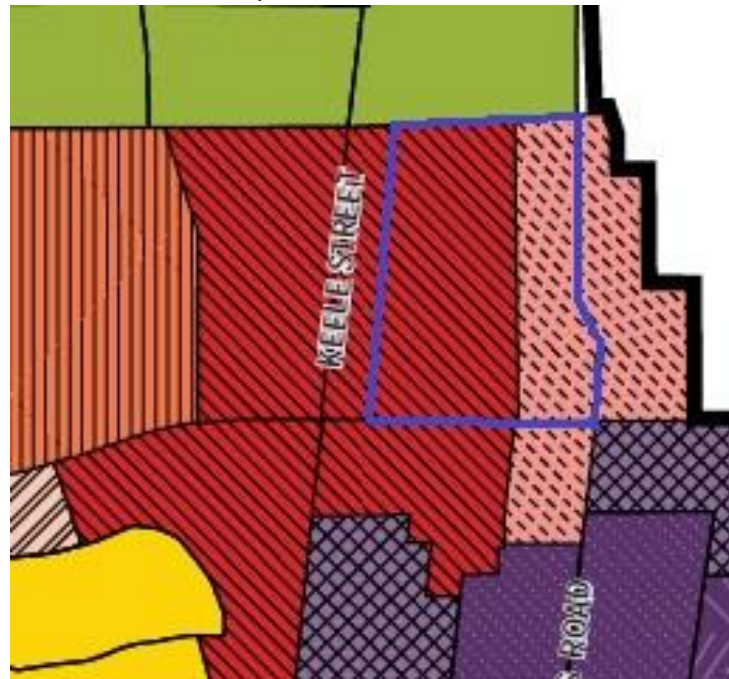


Figure 3 - Map 3 - Land Use Excerpt

Map 3 – Land Use shows the land use designations on the subject lands (see Figure 2).

Looking at the existing development patterns, the office building at 1280 Finch Ave West provides the footprint for an efficient development that provides for separation of future residential land uses and the heavy industrial land uses further to the east. Thus, the western boundary of the building at 1280 Finch Ave West is a logical boundary for the *Mixed-Use Area B* land use designation. Extending this line north creates a more rational boundary for the two land use designations as it creates efficient development blocks for the *Mixed-Use Area B* development. This would allow the internal road network, whether public or private, to be shifted east and located along the boundary between the land use designations to maximize the *Mixed-Use Area A* lands. Aligning the land use designation boundary to the existing pattern of development, and shifting the internal road network slightly east, supports the Secondary Plan’s objective of creating a transit-supportive mixed-use destination.

Development Blocks

Figure 4 shows an overlay of the proposed road network, building heights, and land use designations on mapping showing the existing property lines.



Figure 4 - Potential Development Blocks

Looking at the overlay in Figure 4, it is apparent that development block A is very narrow and difficult to develop for high density residential land uses. As discussed above, shifting the internal road network to the east and realigning the boundary between Mixed-Use Area A and Mixed-Use

Area B would increase the size of development block A and permit a more efficient development of these lands.

Similarly, development blocks D and B1 are undersized and likely unable to support high-density residential development in an efficient manner. The changes to the internal road network would incorporate development block D with development block A resulting in an area with sufficient size and width to support efficient development. Also, realigning the land use designation boundary to the western boundary of the 1280 Finch Ave W development would increase the size of development block B1 which would make it more usable.

Risk Assessments

Section 4.2 of the draft Secondary Plan provides policies on *Land Use Compatibility*. Policy 4.2.5 requires that *“For development within 175 metres of a fuel storage tank, a detailed Risk Assessment is required to demonstrate that low- or more- intensive employment uses are appropriate including any receptor or source mitigation measures required to support the development. The detailed Risk Assessment will include an updated consequence analysis and a frequency analysis. The frequency analysis will address the following subject to the exchange of relevant information from respective fuel distribution terminal operations and appropriate measures to protect confidentiality”*.

There is no definition within the Secondary Plan on what comprises a Risk Assessment evaluation, consequence analysis or a frequency analysis. No criteria for determining is provided to determine whether the study outcomes are positive or negative. There is no criteria for City staff to evaluate the risk assessment to determine if the proposed development is an acceptable risk or not. The policies proposed in this section provide data without interpreting the data into information, thus, the policies need to be clarified or removed.

Further, policy 4.2.6 states that a peer review may be required without any determination of what would qualify as a positive outcome. The following requirements are also undefined:

- *A historical data analysis to inform the frequency of the worst case event;*
- *A consequence analysis;*
- *A fault tree analysis;*
- *An event tree analysis;*
- *A human reliability analysis; and*
- *An external events analysis.*

No definitions are provided on what these studies would be comprised of and no there is no information in the draft Secondary Plan on what would be an acceptable result that would permit the City to approve a development application.

Conclusions

Based on our review of the draft secondary plan and background material, the current proposed road network and land use designations should be modified and certain risk assessment policies should be deleted or more clearly defined to permit more efficient development while achieving the City's objective of creating a vibrant transit-supportive mixed-uses destination while separating future residential land uses from the existing heavy industrial land uses.

Yours truly,

Weston Consulting

A handwritten signature in black ink, appearing to read 'K. Franklin', written over a white background.

Kurt Franklin BMath, MAES, MCIP, RPP
Vice President

Cc: Councillor Pasternak
Councillor Perruzza
Duke Heights BIA
Matt Armstrong, City Planning