

December 3, 2020

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

Attn: Nancy Martins, Secretariat

Re: Item PH19.1

Proposed OPA 483 Keele Finch Secondary Plan – Comments on Certain Proposed Land Use Designations and Suggestions for further policies to encourage investment in the areas designated General Employment Areas

Dear Chair Ana Bailão and Members of the Planning and Housing Committee,

R.E. Millward + Associates Ltd. is writing this letter on behalf of K-Lepage Development Inc., owners of 3757 Keele Street, a property located within the proposed Keele Finch Secondary Plan area.

We appreciate the opportunity to provide comments on proposed Official Plan Amendment #483 for the Keele Finch Secondary Plan as it relates to lands designated *Mixed Use Areas* and *General Employment Areas* on the east side of Keele Street.

Responding to significant transit investment in the Keele Finch area in recent years, specifically the construction of the Finch West TTC station in 2017 and the Finch Avenue West Light Rail Transit (LRT) line currently under construction, the proposed Keele Finch Secondary Plan envisions a high density, mixed-use community that bridges the currently residential character to the west of Keele Street and employment uses to the east. To meet these objectives, the proposed Secondary Plan introduces:

- 1) a finer street network,
- 2) built form policies to create a predominantly mid-rise area with tall buildings limited to immediately adjacent to transit stations,
- 3) permissions and requirements for at-grade retail uses along certain streets, and
- 4) a layer of nuance to existing Official Plan land use designations by creating two subcategories of *Core Employment Areas* and three subcategories of *Mixed Use Areas*.

The proposed Secondary Plan works in concert with proposed Official Plan Amendment #482 which, in addition to delineating the boundary of Toronto's first two Protected Major Transit Stations Areas, redesignates lands on the west side of Keele Street from *Neighbourhoods* and *Apartment Neighbourhoods* to *Mixed Use Areas* and introduces minimum block densities to support the minimum population and employment target of 200 residents and jobs combined per hectare for the Finch West

Transit Station Area. The proposed Keele Finch Secondary Plan, however, appears to maintain significant tension between existing heavy industrial uses and anticipated residential and employment growth immediately surrounding the Finch West station while simultaneously limiting the ability of other areas to support this growth.

Misleading Land Use Designations

The proposed Secondary Plan envisions a density distribution typical of transit-oriented development, with taller buildings concentrated around the major transit stations and a transition down in height moving away from the station area. In the Keele Finch area, this approach is hindered by the presence of Imperial Oil's fuel storage and distribution terminal at 1150 Finch Avenue West (approximately 300 metres east of the intersection of Keele Street and Finch Avenue West). This industry has existed at this location for decades and based on statements made at the Community Information Session on November 9th, have expressed an intention to remain here in the future. The fuel terminal is considered a Class III industry by the Ontario Ministry of Environment and Energy and so, under the Ministry's D-6-3 guidelines, is recommended to have a minimum distance of 300 metres between its property line and sensitive land uses, of which residential uses are one. However, it is exactly the east side of the intersection of Keele Street and Finch Avenue West that is anticipated to see the greatest building heights and densities in mixed use towers up to 32 storeys (once the airport operations cease at the Downsview Airport as per Policy 7.3.6 of the proposed Keele Finch Secondary Plan).

To a certain extent, this land use conflict has been acknowledged in the proposed Secondary Plan through the introduction of the ***Mixed Use Areas B*** land use designation (a more limited version of the city-wide *Mixed Use Areas* designation). *Mixed Use Areas B* prohibits residential uses and sensitive institutional uses, thereby encouraging the creation of a new "office cluster" along Tangiers Road north and south of Finch Avenue West (see *Map 3 – Land Use* of the proposed Keele Finch Secondary Plan in Appendix A). A portion of *Mixed Use Areas B* is additionally subject to a Site and Area Specific Policy that requires a landscape buffer to serve as a green edge between any future development in this area and the existing fuel terminal to the east. By virtue of the above modifications, however, this *Mixed Use Areas B* is constrained in a way that effectively redefines it as *General Employment Areas* in function but with fewer land use permissions, a misleading conceptualization of land use for the area.

In order to ensure a clear policy direction for development in the Keele Finch Secondary Plan area, we believe the *Mixed Use Areas B* designation should be removed from the Secondary Plan and the lands currently designated as such, be redesignated as *General Employment Areas*. By doing so, the land use plan for the intersection would better reflect existing permitted (and prohibited) uses as well as the intent of the area as an "office cluster." This would additionally provide a more appropriate buffer between the Imperial Oil fuel terminal at 1150 Finch Avenue West and sensitive uses along Keele Street, adding approximately 3.3 hectares to the City's supply of employment lands. We recognize that there are several uses permitted in *Mixed Use Areas B* not permitted in *General Employment Areas* as

defined in the proposed Secondary Plan, namely non-sensitive institutional uses and cultural, recreational, and entertainment uses. These uses, however, could be permitted on those lands through area policies specific to this geography, as currently proposed for the east side of Tangiers Road north of Finch Avenue West. The intent of this proposed modification is to create a land use plan that better manages the interface between existing heavier industrial use and mixed use areas that do allow for sensitive uses.

Encouraging Reinvestment in General Employment Areas

A second challenge noted in the Secondary Plan as currently proposed is its vision for the *General Employment Areas* that are located on the east side of Keele Street south of Finch Avenue West or, more accurately, its implementation. Although the proposed Keele Finch Secondary Plan speaks to the importance of Keele Street's "employment spine" and the opportunity the proposed Secondary Plan presents in "reinvigorating office/employment areas" and "attracting new investment and more jobs," policies to encourage this investment, and provide landowners the flexibility to respond to current and future trends in the office/employment market, appear to be lacking. The Secondary Plan envisions the *Keele South Corridor* as a vibrant and walkable retail main street with mixed-use employment on the east side of Keele Street in mid-rise buildings at least 4 storeys in height with retail required on the ground floor. Despite these expectations for future employment-related development, there appears to be no policies in the Secondary Plan to encourage this higher intensity of employment development.

As the east side of Keele Street currently consists of predominantly low-rise low-density retail uses, additional policies are necessary to encourage the kind of redevelopment and reinvestment in *General Employment Areas* envisioned by the Keele Finch Secondary Plan. A similar exercise has been undertaken for Secondary Plans in other parts of the City, incorporating implementation policies to encourage redevelopment and reinvestment. In the Golden Mile Secondary Plan (adopted by City Council on October 27, 2020), this took the form of policies pointing to incentive programs such as Imagination, Manufacturing, Innovation, and Technology (IMIT) as well the creation of an innovation hub in partnership with existing post-secondary institutions in the area and a potential future business association to support existing and future businesses in the area. In the case of the King-Spadina and King-Parliament Secondary Plans, (although they dealt with *Regeneration Areas* that were predominantly designated *Mixed Use Areas* in their respective land use plans) policies consistent with OPA 231 were introduced to protect existing employment uses and ensure growth of employment uses through policies that require the replacement of existing office space and a minimum proportion of new gross floor area (GFA) to be non-residential. Both represent ways of conceptualizing the relationship between employment lands or uses and their surroundings.

Employment lands are often seen as discreet entities from their surroundings, the protection of which is a parallel but distinct objective to the creation of complete communities. The Keele Finch Secondary Plan provides an opportunity to think more creatively about the integration of *General Employment*

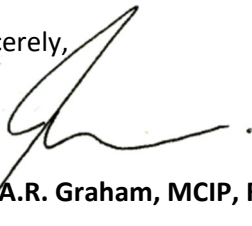
Areas to Mixed Use Areas that are often located in close proximity and, more generally, about the role of *Employment Areas* in mixed-use transit-oriented development. Whether this takes the form of permitting a wider range of uses to allow landowners the flexibility to respond to changing demands in the office/employment market, fostering greater partnerships within and between businesses and local institutions, or simply additional language speaking to the role of employment lands in the planning and experience of complete communities on the ground, more proactive planning is needed to encourage reinvestment in the area's, and the City's, *Employment Areas*.

Conclusion

We acknowledge that the proposed Keele Finch Secondary Plan has been several years in the making and represents an important new vision for the Keele/Finch area that has only become possible through recent investment in transit infrastructure. The intention of our comments above is to encourage the City to be more creative and clear in how they plan for *Employment Areas*. As one of the first Protected Major Transit Station Areas in the City of Toronto and an area that is representative of those being served by new higher order transit lines, the Keele Finch area, and associated Secondary Plan, could be a pilot for more innovative planning, something that will only become more important as the City continues to face challenges balancing population and employment growth into the future.

Thank you for the opportunity to share these comments with the Committee.

Sincerely,



Ian A.R. Graham, MCIP, RPP

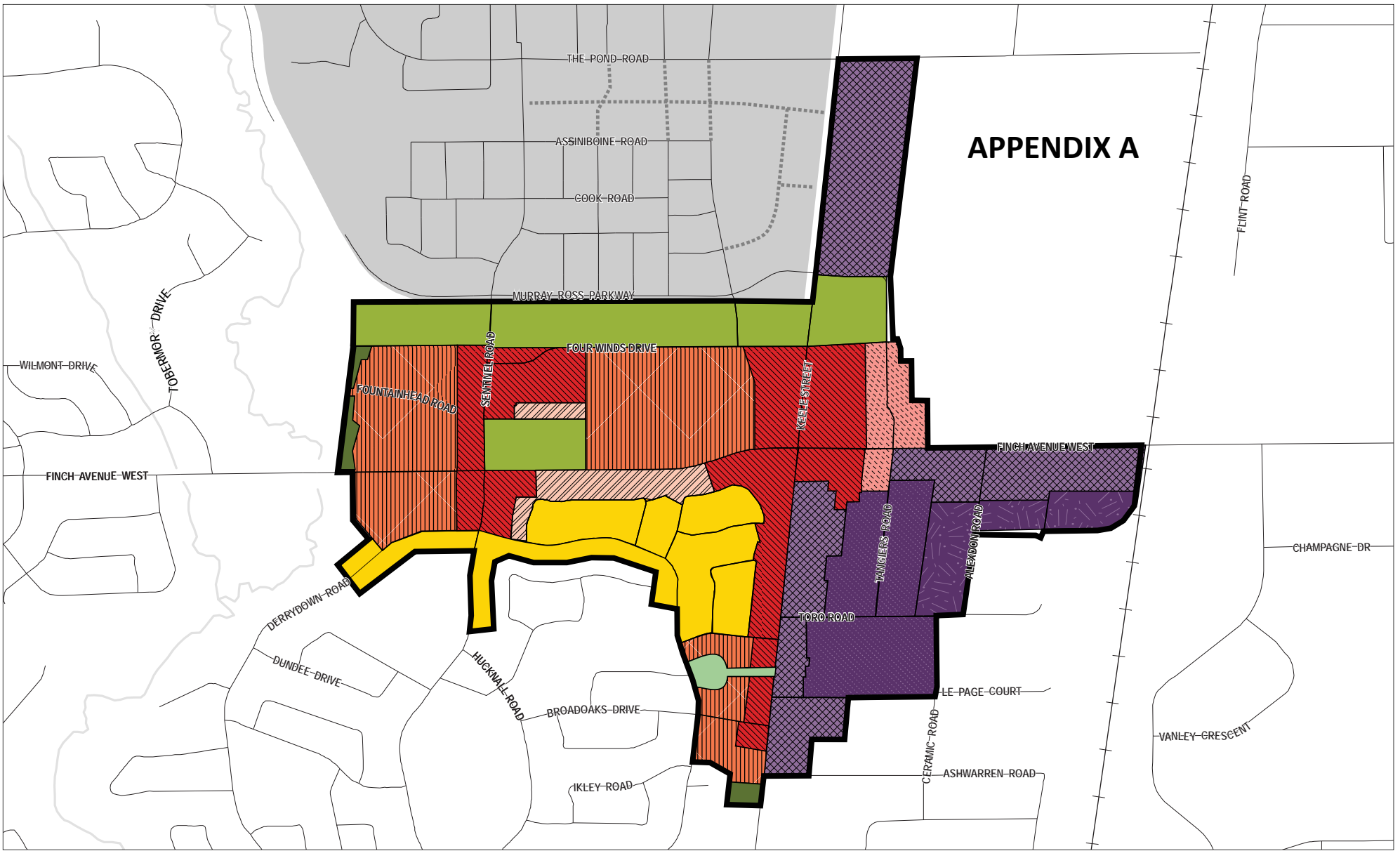
Director

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Attachments: Appendix A – Proposed Keele Finch Secondary Plan Map 3 – Land Use

CC: K-Lepage Development Inc., 3757 Keele Street
James Pasternak, Councillor, Ward 6 York Centre
Anthony Perruzza, Councillor, Ward 7 Humber River-Black Creek

APPENDIX A



Keele Finch Secondary Plan

Map 3 - Land Use

- | | | | |
|---|--------------------------|--------------------------|-------------------|
| Secondary Plan Boundary | Neighbourhoods | Mixed Use Areas C | Natural Areas |
| York University Secondary Plan Area | Apartment Neighbourhoods | General Employment Areas | Parks |
| Conceptual York University Street Network | Mixed Use Areas A | Core Employment Areas A | Other Open Spaces |
| | Mixed Use Areas B | Core Employment Areas B | |

Not to Scale
February 2020