

WESTON CONSULTING

planning + urban design

City of Toronto
100 Queen Street West
10th Floor, West Tower
Toronto, Ontario M5H 2N2

December 7, 2020
File 6069-1

Attn: Members of Planning and Housing Committee

**RE: Planning and Housing Committee Item PH19.1
Proposed OPA 483: Keele Finch Secondary Plan &
Proposed OPA 482: Protected Major Transit Station Areas
17 & 25 Tangiers Road Submission Letter**

Weston Consulting is the planning consultant for Soneil 17 Tangiers Inc. and Soneil Tangiers Inc., the registered owners of the properties municipally addressed as 17 and 25 Tangiers Road in the City of Toronto (herein referred to as the “subject lands”).

We have reviewed the proposed Official Plan Amendments (“OPAs”) 483 and 482 regarding the Keele Finch Secondary Plan and Protected Major Transit Station Areas respectively, as well as the Keele Finch Plus Study – Final Report dated November 24, 2020 prepared by City Planning Staff. The purpose of this letter is to provide comments on the proposed OPAs on behalf of our client as it relates to the subject lands.

Description of Subject Lands

The subject lands are located on the east side of Tangiers Road, south of Finch Avenue West and east of Keele Street. The lands are comprised of two separate parcels and haven a total combined area of 1.69 hectares (4.17 acres). The lands are currently occupied by two low-rise industrial buildings and are located approximately 400 metres walking distance from the Finch West Subway Station and 250 metres walking distance from the future Keele Finch LRT Station.

The subject lands are located within a designated ‘*Employment Area*’ and are designated ‘*Core Employment Area*’ by the City of Toronto Official Plan. The lands are also located within the Keele Finch Secondary Plan (the “Secondary Plan”) area and are included within the proposed delineated boundary of the Finch West Protected Major Transit Station Area (“PMTSA”).

Overview of OPA 483: Keele Finch Secondary Plan

The northern portion of the subject lands (25 Tangiers) is proposed to be included in the Keele-Finch Node in accordance with proposed Map 2 – Area Structure of the Secondary Plan, which is to be the primary centre and main focus for development. The southern portion of the lands (17

Tangiers) is located outside of all nodes and corridors, and the underlying proposed land designation would apply. The subject lands are proposed to be designated as Core Employment Areas A in their entirety on proposed Map 3 Land Use, which would permit a range of non-residential permissions and light industrial uses. This includes offices, production studios, light industrial uses, industrial trade schools, and parks and open spaces. Locally-serving, small-scale retail uses ancillary to and on the same lot as the primary uses would also be permitted.

The lands fronting Finch Avenue abutting the subject lands to the northwest (1285, 1295, 1315 & 1325 Finch Avenue West and 30 Tangiers Road) are proposed to be designated for mixed-use, including non-employment and residential uses, in accordance with the proposed Secondary Plan. Applications for Zoning By-law Amendment and Draft Plan of Subdivision have been filed with the City for this site to permit three 14-storey mixed-use towers with residential and commercial uses, and a 13-storey office building.

Overview of OPA 482: Protected Major Transit Station Areas

OPA 482 identifies the subject lands in their entirety as being included within the delineated MTSA boundary for the Finch West Transit Station. Overall, existing and future development within the MTSA will collectively achieve a minimum population and employment target of 200 residents and jobs per hectare. In accordance with OPA 482, the northern portion of the subject lands are proposed to support the achievement of a minimum gross block density of 1.4 FSI and the southern portion of the subject lands are proposed to support the achievement of a minimum gross block density of 0.8 FSI.

Comments on Proposed OPAs

A detailed submission letter was filed with City Planning on March 20, 2020 which outlines our full detailed comments on the proposed OPAs and is appended to this letter as Attachment 1. This letter provides a summary of our position. Please refer to Attachment 1 for our complete submission.

In summary, based on the location of the subject lands on the southeast corner of the Keele-Finch Node and within the delineated MTSA boundary, we submit that:

- The subject lands are appropriate for intensification. We support the increased heights and densities proposed for the subject lands by the draft Secondary Plan. We further support the inclusion of the subject lands within the Finch West MTSA boundary given their location of less than 500 metres from both the subway and future LRT stations.
- Given their location within the proposed PMTSA Boundary, the entirety of subject lands should be included within the Keele-Finch Node in order to support more efficient use of land and to allow for a more fulsome development of the subject lands.

- The developable area of the subject lands is significantly constrained as a result of the proposed fine-grain road network and New/Improved Connections. This limits the potential for a comprehensive redevelopment of the lands and constrains the achievable heights and densities despite increased permissions.
- The overall fine-grain road network for the employment area portion of the Secondary Plan area creates small development blocks and parcels that are not well-suited for the employment uses they are designated for. Fewer public streets, including the elimination of the proposed public street that bisects the subject lands, would allow for larger development parcels that would be better suited for employment uses.
- The division of the employment area into smaller development blocks limits the potential for the consolidation of infrastructure between multiple properties. There is currently no incentive to redevelop the employment lands within the Secondary Plan area.
- The proposed Secondary Streets appear to directly conflict with the current location of the existing buildings on the subject lands. In general, the proposed road network should take advantage of straddling property lines, where possible, rather than being located fully within a property boundary and fewer public streets, which would allow for larger development parcels.
- The proposed fine-grain road network and proposed pedestrian network is more suitable for a mixed-use community, rather than an employment area. The proposed active transportation network for commuters, transit users, cyclists and pedestrians would result in conflicts and safety issues with the efficient movement of goods and trucking operations.
- The proposed policy framework positions the subject lands for the accommodation of a wider range of land uses beyond the permitted employment uses, including mixed-use residential and retail development. A broader range of employment and employment-related uses should also be provided for, including a variety of non-traditional employment uses.
- Our client is supportive of the establishment of future residential uses on the subject lands through the active Municipal Comprehensive Review (“MCR”) process and in-process review of employment conversion requests, in which our client is actively participating. The final approval of the Secondary Plan is premature in light of the ongoing MCR and consideration of employment conversions.

Thank you for the opportunity to provide these comments. We intend to continue to monitor the Secondary Plan process on behalf of our client. Please refer to Attachment 1 to the letter for a full outline of our comments on the proposed Secondary Plan and MTSA OPAs.

Please contact the undersigned at extension 245 or Jessica Damaren at extension 280 should you have any questions regarding the content of this submission.

Yours truly,

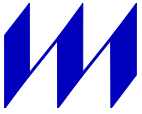
Weston Consulting



Sandra K. Patano, BES, MES, MCIP, RPP
Associate

cc. N. Jain, Soneil Tangiers Inc. & Soneil 17 Tangiers Inc.
M. Armstrong, Planner, City of Toronto

ATTACHMENT 1



WESTON CONSULTING

planning + urban design

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

March 20, 2020
File 6069-1

Attn: Matt Armstrong, Planner, Strategic Initiatives

Dear Sir,

**RE: Proposed Draft OPA 483: Keele Finch Secondary Plan &
Proposed Draft OPA 482: Protected Major Transit Station Areas
17 and 25 Tangiers Road**

Weston Consulting is the planning consultant for Soneil 17 Tangiers Inc. and Soneil Tangiers Inc. the owners of the properties located at 17 and 25 Tangiers Road in the City of Toronto (herein referred to as the 'subject lands'). We have been engaged to provide assistance to the landowner during the Keele Finch Secondary Plan (the 'Secondary Plan') process.

We have reviewed the proposed draft Secondary Plan which was released on January 23, 2020 and are pleased to provide the following comments on behalf of our client as they relate to the proposed draft OPA 483: Keele Finch Secondary Plan and the proposed draft OPA 482: Protected Major Transit Station Areas.

Description of the Subject Lands

The subject lands are located on the east side of Tangiers Road, south of Finch Avenue West and east of Keele Street. The lands are comprised of two separate properties having a total combined area of approximately 1.69 hectares (4.17 acres). The lands are currently occupied by two 1- and 1.5-storey industrial buildings and associated parking areas with vehicle access from Tangiers Road.

The lands are legally described as PT LT 20 CON 3 WYS TWP OF YORK AS IN TB306812; TORONTO (N YORK), CITY OF TORONTO and PT LT 20 CON 3 WYS TWP OF YORK AS IN NY502543; TORONTO (N YORK), CITY OF TORONTO.

The subject lands are located within 500 metres of the Finch West Subway Station and are currently within a designated '*Employment Area*' under the City of Toronto Official Plan. The lands are further designated 'Core Employment Area', which permits all types of manufacturing, processing, warehousing, wholesaling, distribution, storage, transportation facilities, vehicle repair

and services, offices, research and development facilities, utilities, waste management systems, industrial trade schools, media, information and technology facilities, and vertical agriculture.



Figure 1 - Air Photo of Subject Lands – 17 & 25 Tangiers Road

Proposed Draft OPA 483: Keele Finch Secondary Plan

The subject lands are located within the Keele Finch Secondary Plan area. A draft of the Secondary Plan was released on January 23, 2020. The comments included in this submission are based on this draft of the Plan.

The northern portion of the subject lands (25 Tangiers Road) is proposed to be included in the Keele-Finch Node in accordance with Map 2 – Area Structure, which is to be the primary centre and main focus for development. Tangiers Road is intended to support the creation of an office and employment cluster to accommodate a high concentration of employment uses (Section 3.1.2). The southern portion of the lands (17 Tangiers Road) is located outside of all nodes and corridors and the underlying proposed land use designation will apply.

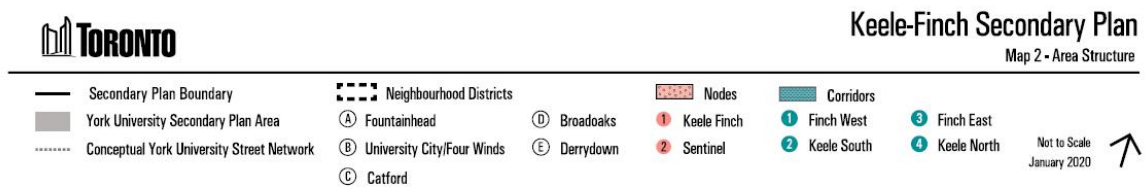
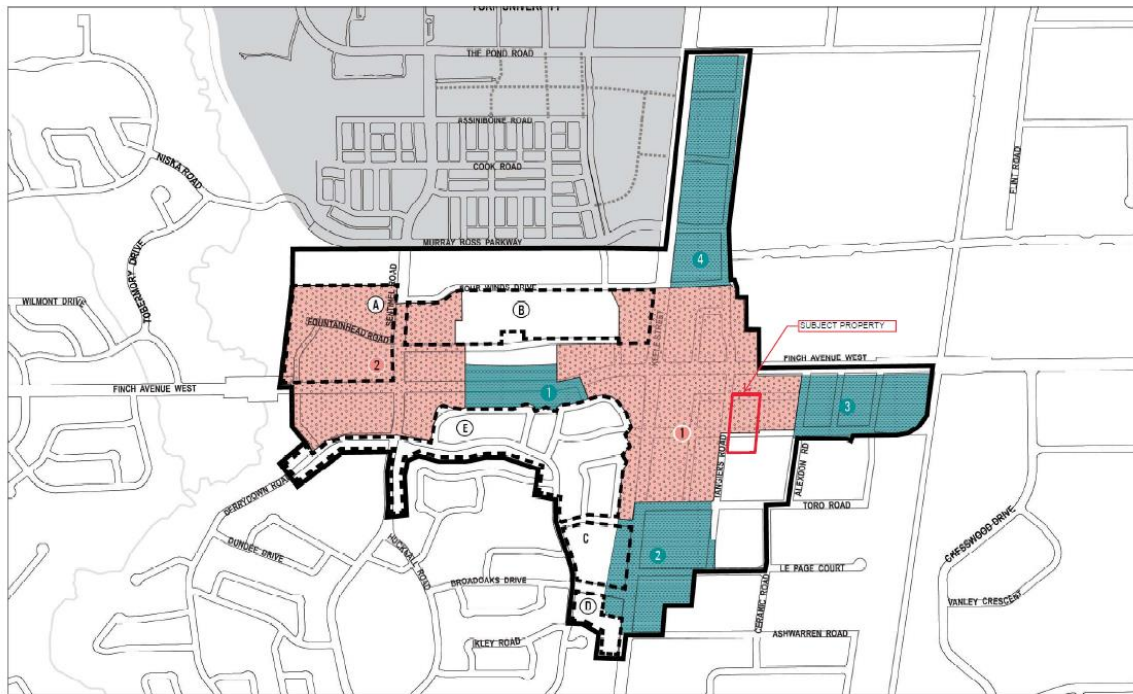


Figure 2 - Proposed Map 2 - Area Structure

Map 3 – Land Use proposes to designate the subject lands as “Core Employment Areas A” in their entirety, which will permit a range of non-residential permissions and light industrial uses. This includes offices, production studios, light industrial uses, industrial trade schools, and parks and open spaces. Locally-serving, small-scale retail uses ancillary to and on the same lot as the principal uses will also be permitted.

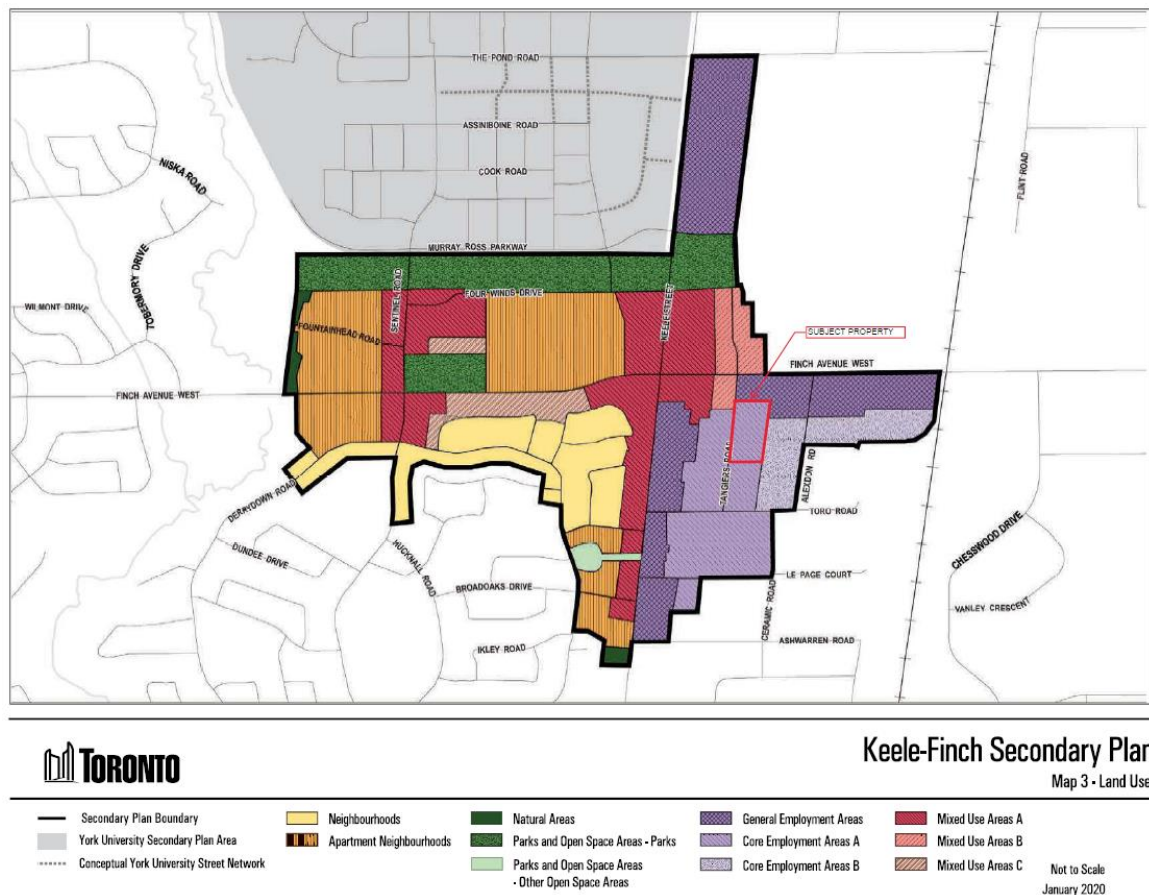


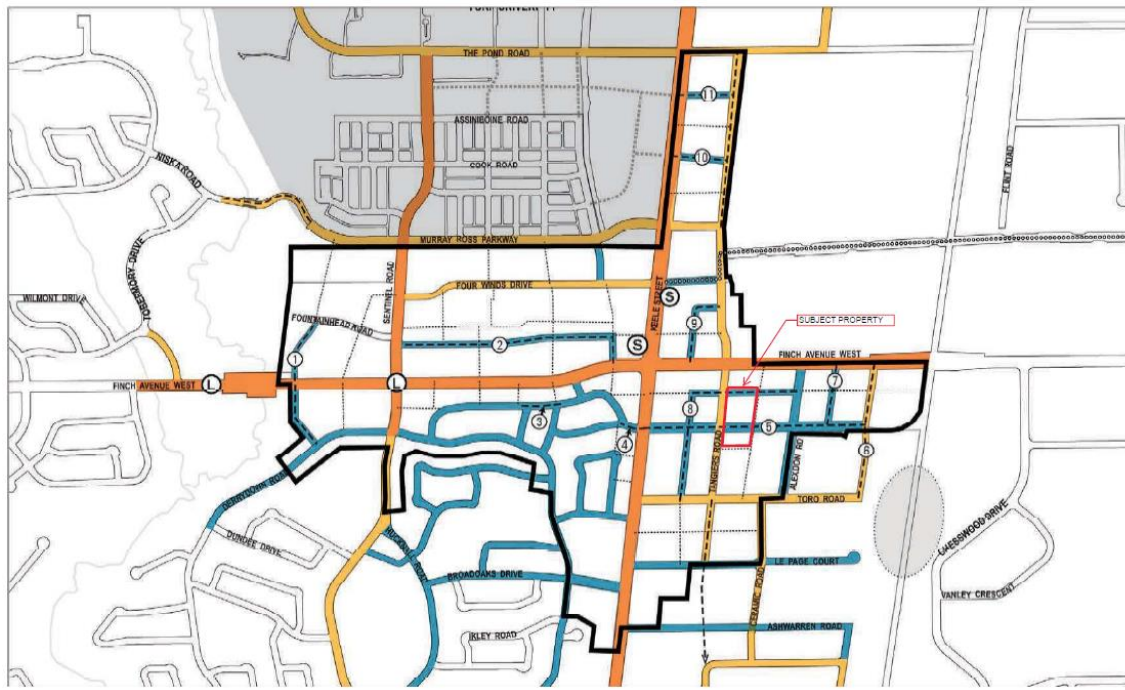
Figure 3 - Proposed Map 3 - Land Use

Map 4 – Public Street Plan proposes two new Secondary public streets that traverse the subject lands in an east-west direction along the northern portion and centrally through the subject lands breaking up the lands into separate blocks. The northern street (New Link 8) is proposed to have a planned right-of-way width of 20 metres, while the more southern street (New Link 5) centrally bisecting the subject lands is proposed to have a greater right-of-way width of 23 metres. Based on our review, it appears that the proposed new street network will have implications on the existing buildings currently occupying the subject lands, and can impact the potential for a future comprehensive development of both properties.

Map 4 – Public Street Plan also identifies *New/Improved Connections*, including a proposed new/improved connection running north-south along the eastern boundary of the subject lands and a second new/improved connection running east-west along the southern boundary of 17 Tangiers Road. Proposed Policy 6.2.5 of the draft Secondary Plan indicates that these conceptual *New/Improved Connections* are potential locations for additional public streets that may be required as sites develop. In addition, Schedule 1 – Existing Minor Streets with Right-of-Way Widths Greater than 20 Metres identifies Tangiers Road to have a planned right-of-way width of up to 27 metres, whereas it is currently approximately 20 metres in width in the vicinity of the

subject lands, requiring a potential road widening along Tangiers Road. If the *New/Improved Connections* become locations for new public streets, or another type of mid-block connection, this will, in combination with the widening of Tangiers Road, create reduced parcel sizes. This further limits the potential for a comprehensive redevelopment of the subject lands and hinders the ability to achieve the heights and densities proposed for the lands by the draft Secondary Plan.

The developable area of the subject lands is further reduced through proposed Policy 7.1.10 d) of the draft Secondary Plan, which requires that development be setback both above and below grade approximately 3 metres for all sites designated Employment Areas that abut Primary and Secondary Streets. Proposed Policy 7.2.10 further requires that the massing of non-residential mid-rise buildings (between 5 and 9 storeys in height) fit within a 45-degree angular plane taken from a height equivalent to 80 per cent of the planned right-of-way on fronting streets and required setbacks.



Keele-Finch Secondary Plan
Map 4 - Public Street Plan

- | | | | |
|---|----------------------------|-------------------------------|--|
| — Secondary Plan Boundary | ≡ Future Bridge Connection | New/Improved Connection | ① Links |
| ■ York University Secondary Plan Area | — Major Streets | — Bus Way | ⊙ New east-west connection to be further studied |
| Conceptual York University Street Network | — Primary Streets | Ⓛ LRT Stop | Not to Scale |
| --- New Public Streets | — Secondary Streets | Ⓢ Subway Station | January 2020 |

Figure 4 - Proposed Map 4 - Public Street Plan

Map 7 – Minimum Heights and Map 8 – Maximum Height Limits identify the proposed minimum and maximum heights permitted on the subject lands. The proposed mapping identifies a minimum building height of 2 storeys and a maximum height of 25 metres on the subject lands. The draft

policy direction with respect to building heights, Policy 7.3.5, states that where a site is designated Employment Areas and has a maximum height limit of 25 metres, the maximum permitted building height may be exceeded by an additional two storeys (approximately 8 metres) where it can be demonstrated there is sufficient transportation capacity, that the operational needs of the Downsview Airport will not be impacted, and that adequate sunlight is maintained.

Intensification

It is our opinion that the subject lands are appropriate for employment intensification, including the increased heights and densities proposed by the draft Secondary Plan. We are supportive of the designation for greater heights and densities for the subject lands; however, in our opinion, the subject lands provide a significant opportunity for comprehensive redevelopment in order to better achieve the proposed heights and densities. In accordance with Section 3 of the draft Secondary Plan, Nodes are to be compact areas that will accommodate more intense density, uses and activities. As such, we request that the entirety of the subject lands be included within the Keele-Finch Node in order to support more efficient use of land and to allow for a more fulsome development of the lands.

Road Network

Notwithstanding our support for the proposed designation of the subject lands, we have identified concerns related to the proposed road network. As noted, two Secondary Streets are proposed to traverse the subject lands, with the more southerly street traversing centrally through the site. As a result, this will serve to break up the subject lands into significantly smaller disconnected parcels. Tangiers Road will also require a road widening to achieve the planned right-of-way width of 27 metres and the draft Secondary Plan contemplates New/Improved Connections adjacent to the eastern and southern property boundaries of the subject lands which have the potential to become public streets or other public mid-block connections. In conjunction with the proposed setbacks from public streets and the required 45-degree angular plane, these policies significantly reduce the developable area of the subject lands and surrounding employment parcels.

In addition, smaller lot sizes and separation of the parcels by a 23-metre right-of-way will reduce the redevelopment potential of the subject lands, limiting the potential for a comprehensive redevelopment and constraining the achievable heights, despite the increased permissions afforded through the general land use designation and height mapping. These small parcel sizes created by the proposed fine-grain road network are not well suited for the employment uses they are designated for in the draft Secondary Plan. In accordance with Provincial policy direction, Employment Areas are intended to be protected for current and future employment uses and the availability of sufficient and appropriate lands shall be ensured for a variety of employment uses generally characterized by larger buildings, some surface parking, loading facilities, etc. This generally includes maintaining lots that are suitable in size to accommodate employment uses. It is our opinion that fewer public streets, including the elimination of the proposed public street that bisects the subject lands, would allow for larger development parcels that would be better suited for accommodating employment uses.

Furthermore, based on our preliminary review, it appears that the proposed new Secondary Streets will directly conflict with the current location of the existing buildings on site. We request that the road network be modified such that only one street traverses the subject lands so that the lands are not broken up into smaller development parcels, and where possible in a manner that straddles the property boundary of 25 Tangiers Road and the adjacent property to the north.

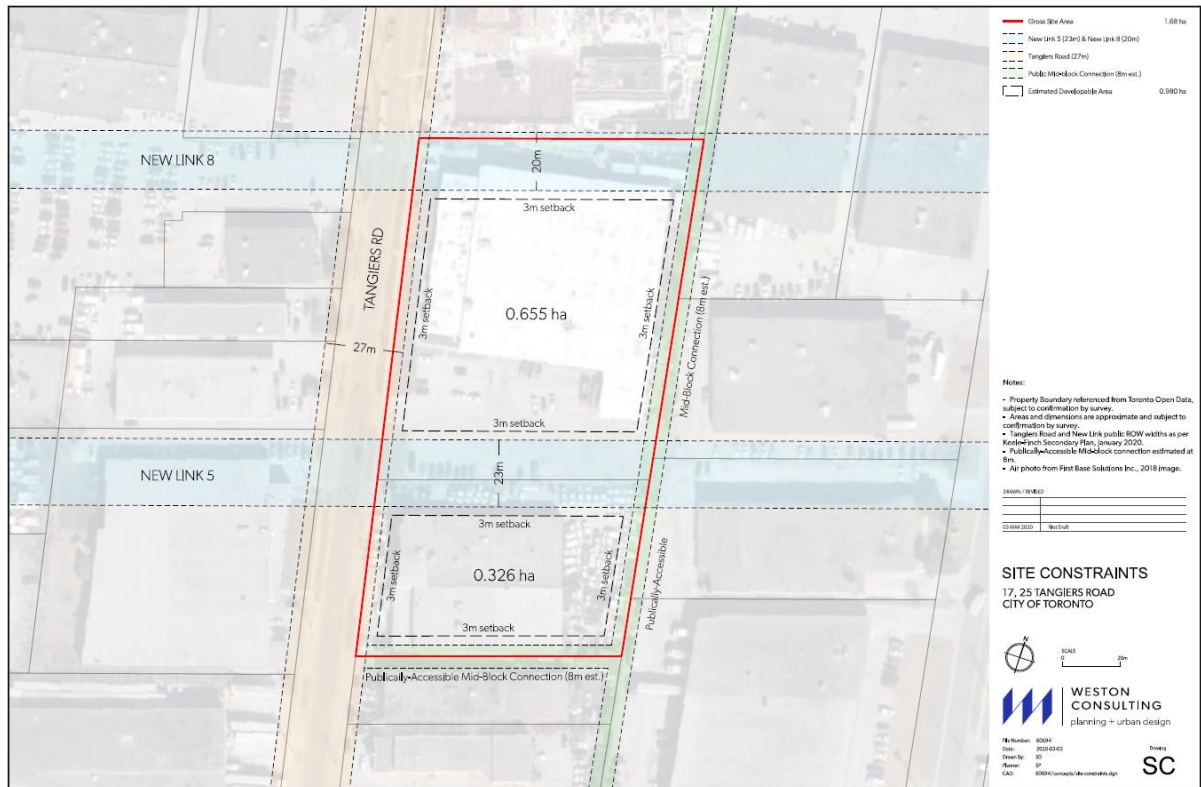


Figure 5 - Site Constraints - 17 & 25 Tangiers Road

Land Uses

Given the limited land use permissions afforded to the lands located within the employment area of the Secondary Plan area and the significant restrictions to the developable area of these parcels as a result of the proposed new fine-grain road network, an environment is created which provides little incentive for the employment lands to be redeveloped in a more contemporary way. Additionally, the draft Secondary Plan structure, as well as the inclusion of the subject lands within the Keele-Finch MTSA as described below, positions the lands for the future accommodation of mixed-use development, including residential uses. The fine-grain road network proposed by the draft Plan is more suitable for a mixed-use community and the proposed mid-block pedestrian and cyclist connections further support this.

Proposed Draft OPA 482: Protected Major Transit Station Area

As noted, the subject lands are located within 500 metres of the Finch West Subway Station. Subway stations fall within the Growth Plan's definition of higher order transit stops, which locates the subject lands within the catchment area of the Finch West Major Transit Station Area ("MTSA").

A related draft Official Plan Amendment has been proposed to address the Protected Major Transit Station Areas within the Keele-Finch area. This OPA provides additional policies to direct change around the Finch West Subway Station and defines the boundaries of the Finch West MTSA. In accordance with Map 1 – Finch West Transit Station Area of the draft OPA, the subject lands in their entirety are included in the delineated MTSA boundary for the Finch West Transit Station.

On accordance with the direction of the Growth Plan, the Finch West MTSA will support minimum density and intensification targets. Overall, existing and future development within the MTSA will collectively achieve a minimum population and employment target of 200 residents and jobs per hectare. Map 2 – Minimum Densities, Finch West Transit Station Area of the draft OPA, further defines the desired minimum densities within the MTSA by development block. The northern portion of the subject lands are proposed to support the achievement of a minimum gross block density of 1.4 FSI. The southern portion of the subject lands are proposed to support the achievement of a minimum gross block density of 0.8 FSI.

We support the inclusion of the subject lands within the Finch West MTSA boundary in their entirety. In keeping with the proposed heights and densities proposed for the subject lands by the draft Secondary Plan, we are supportive of increased densities on the subject lands in order to support the density targets assigned to the Finch West MTSA. However, the proposed fine-grain street network as discussed above divides the subject lands into separate development blocks, which limits the redevelopment potential and the maximum achievable heights and densities that could be achieved through a comprehensive redevelopment of the lands as a single parcel. Additionally, this limits the potential for the consolidation of infrastructure, including parking, loading and services between the properties. It is our opinion that the minimum density targets for the Finch West MTSA could be better achieved if the subject lands were maintained as a combined parcel rather than separated into different development blocks.

Summary

In the context of the concerns expressed over the proposed fine-grain road network, we generally support the proposed designation of the subject lands for greater employment heights and densities. Based on the location of the subject lands on the southeast corner of the Keele-Finch Node and within the delineated MTSA boundary, it is our opinion that:

- The subject lands are appropriate for employment intensification, and we support the increased heights and densities as proposed by the draft Secondary Plan. Similarly, we support the inclusion of the subject lands within the Finch West Major Transit Station Area boundary given their location within 500 metres of the Finch West Subway Station.

- Given their location within the proposed MTSA boundary, the entirety of the subject lands should be included within the Keele-Finch Node in order to support more efficient use of land and to allow for a more fulsome development of the lands.
- The developable area of the subject lands is significantly constrained as a result of the proposed fine-grain road network, a future widening of Tangiers Road and the proposed New/Improved Connections adjacent to the eastern and southern property boundaries. These reductions to the parcel size, in combination with the proposed setbacks from public streets in employment areas and the required 45-degree angular plane, further limits the potential for a comprehensive redevelopment and constrains the heights and densities achievable despite the increased permissions.
- The overall fine-grain road network proposed for the employment area portion of the Secondary Plan area results in creation of small development parcels and blocks which are not well-suited for the employment uses for which they are designated. Fewer public streets, including the elimination of the proposed public street that bisects the subject lands, would allow for larger development parcels that would be better suited for employment uses.
- The division of the employment area parcels into smaller development blocks limits the potential for the consolidation of infrastructure, including parking, loading and other services between multiple properties. There is currently no incentive to redevelop the employment lands within the Secondary Plan area or to provide underground parking facilities under the proposed draft framework.
- The proposed fine-grain road network is more suitable for a mixed-use community rather than an employment area. The proposed policy framework set out by the draft Secondary Plan positions the subject lands for accommodating a wider range of uses beyond the permitted employment uses, including mixed-use residential development. Our client would be supportive of the establishment of future residential uses through the upcoming MCR process.
- The proposed new Secondary Streets appear to directly conflict with the current location of the existing buildings on the subject lands. In general, the proposed road network should be modified to take advantage of straddling property lines where this opportunity is available, rather than being located fully within a property boundary.

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 at extension 245 or Jessica Damaren at extension 280 should you have any questions regarding this submission.

Yours truly,

Weston Consulting



Sandra K. Patano, BES, MES, MCIP, RPP
Associate

cc. N. Jain, Soneil Tangiers Inc. & Soneil 17 Tangiers Inc.