

HUMPHRIES PLANNING GROUP INC.

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September 3, 2021
HPGI File: 21719

City of Toronto
City Planning Division
Zoning By-law Section
100 Queen Street West, 19E
Toronto, ON
M5H 2N2

ATTN: Carola Perez-Book, Senior Planner

**Re: Zoning Conformity with OPA 231 for Official Plan Employment Areas
City of Toronto
Village of Duke Heights Landowners Group**

Humphries Planning Group Inc. (HPGI) is the planning consultant for a group of landowners (collectively the 'Landowners') with properties located within the proposed Keele Finch Secondary Plan (endorsed by City of Toronto Council as Official Plan Amendment (OPA 483) (the 'Secondary Plan') as well as the proposed Finch West Protected Major Transit Station Area (as established through OPA 482) (the 'MTSA') (the 'Subject Lands').

The Subject Lands are located in the south-east quadrant of the intersection formed by Keele Street and Finch Avenue West, and include lands along the easterly portion of the Keele Street Corridor and the westerly side of Tangiers Road between Finch Avenue West and Toro Road. The Subject Lands, in addition to others, are located within an area that is currently being considered as part of a City of Toronto zoning framework study which is intended to bring employment areas into conformity with Official Plan Amendment 231. The effect of the Study would remove certain zoning use permissions in all former general zoning by-laws and the city-wide Zoning By-law for lands designated as Employment Areas in the Official Plan.

We have reviewed the Planning and Development Report dated June 10, 2021 and recognize the importance of the preservation of Employment Areas in order to support business and economic activity. However, we have a number of concerns related to the impact of the proposed zoning by-law amendment on the future development of the block. We provide the following concerns and comments for consideration as the City

advances Phase 1 of the Study through potential amendments to the City's current land use planning policies.

Impact to Existing Community

Secondly, it is our opinion that the proposed list of exclusions from the Zoning By-laws could threaten the viability of existing industries operating in the area, including traditional employment uses which rely on non-employment uses to provide a supporting and complimentary role and function to the broader employment area. The proposed excluded uses have and can co-exist with surrounding commercial, industrial and employment land uses without land use conflict or incompatibilities. It is also expected that as a result of the proposed amendment, a number of properties will be rendered legal non-conforming. The proliferation of legal non-conforming uses is a concern that has the potential to cause future land-uses conflicts, impact the future sale of properties, and can create uncertainty with long-term implications.

Not in Keeping with Long Term Vision

It appears that through the implementation of Phase 1 of the Study, the deletion of a number of uses, including but not limited to, day nurseries, places of worship, education uses, schools, municipal shelters, entertainment uses, recreation uses and other could unnecessarily limit the redevelopment of the Subject Lands as contemplated in the Secondary Plan and OPA 482. The Subject Lands are identified as being within the Keele-Finch Node within the Secondary Plan. Lands within this Node are intended to be the main focus for development and a destination for shopping, dining, employment and recreation. Further, the Secondary Plan contemplates a shift to office/higher density employment uses based on a minimum height of 4 storeys across the site. Recognizing that the Subject Lands have been planned to redevelop as a comprehensive mixed-use community over the next 25+ years in order to take advantage of their strategic location at the nexus of two (2) higher order transit facilities, including the Finch West LRT and Finch West subway station, the potential zoning by-law amendments could compromise the realization of the future planned vision for the block and surrounding lands. The proposed amendment is in not in keeping with the long-term vision for the area.

Premature to Remove

In relation to the Subject Lands and the broader Keele Finch Secondary Plan Area, the proposed zoning framework is premature as the area has not had ample time to develop into the transit-supportive, mixed use neighbourhood delivering a mix of land uses and diversity of building types. It is imperative that existing land uses permissions remain flexible and sensitive to future redevelopment scenarios that seek to implement the land

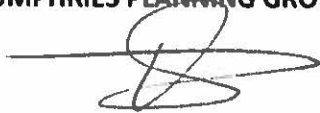
uses, densities, building forms, and transportation systems established through the Secondary Planning process. Allowing greater flexibility will create a better integration of employment areas with adjacent non-employment uses and attract high density employment uses that will likely benefit from a mixed-use and amenity rich environment with convenient access to light rail transit and subway.

For the reasons outlined above, we respectfully request that the Subject Lands be removed or specifically excluded from any of the amending by-laws associated with the Zoning Conformity for Official Plan Employment Areas Study.

Please provide us with notice of any future meetings, reports and/or any decisions of Council or in relation to this matter and we are thankful for your consideration of our comments herein.

Yours truly,

HUMPHRIES PLANNING GROUP INC.



Rosemarie L. Humphries BA, MCIP, RPP
President

- c. Duke Heights Landowners Group
Catherine Lyons, Goodmans LLP