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December 15, 2020

VIA EMAIL

Mayor John Tory and Members of City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Planning and Housing Committee, Committee Administrator & City Clerk

Your Worship and Members of Council:

**RE: Keele Finch Plus Study Final Report
Proposed OPA 482 & Proposed OPA 483
Submissions by Tanjoe Investments Limited
Item PH19.1**

We are the lawyers for Carmen Tanzola Limited, Tanjoe Investments Limited, and related companies (collectively, "**Tanjoe**") who own a number of employment properties within and around the Keele Finch Plus Study area.

We are writing in advance of City Council's consideration of Official Plan Amendment 482 (the proposed Protected Major Transit Station Area or the "**PMTSA**") and Official Plan Amendment 483 (the proposed Keele Finch Secondary Plan or the "**Secondary Plan**").

Tanjoe has an interest in properties municipally known as 98-100 Ashwarren Road, 45 Lepage Court, 125 Ashwarren Road, and 25 Toro Road. Certain of these properties are within the PMTSA and/or Secondary Plan; others are in the immediate vicinity.

PMTSA – Minimum Density and Gross Development Blocks

The properties at 98-100 Ashwarren Road and 45 Lepage Court are within the PMTSA and are indicated to have a proposed minimum density of 0.6 Floor Space Index (FSI).

The property at 25 Toro Road is identified within the PMTSA as part of a gross development block and indicated to have a proposed minimum density of 1.2 FSI.

Tanjoe supports the identification of these lands within the PMTSA as an appropriate location for intensification and growth in accordance with provincial direction. On behalf of Tanjoe, however, we are concerned that the City has employed only the minimum densities referred to in the Growth Plan and has not demonstrated how or why such minimums are appropriate. There may in fact be additional opportunities for growth and intensification in these areas.

Under OPA 482, densities within a gross development block are intended to be calculated over the area of the block, rather than on an individual site basis, and there is a requirement for the preparation of a block context plan including with the cooperation of adjacent owners if possible. While the concept of block planning may be appropriate in some situations, given the existing uses and tenancies of these properties, it should be contemplated that not all the properties will redevelop in coordination with each other and cooperation between owners may not be achievable in all circumstances.

Secondary Plan

Only the property at 25 Toro Road is included within the boundaries of the proposed Secondary Plan. This site is proposed to be designated *Core Employment Areas A* and is currently designated *Core Employment Areas* under the City's Official Plan.

We are aware that the City is currently considering requests to convert employment properties as part of its ongoing Municipal Comprehensive Review (the "**MCR**"). The proposed designation of 25 Toro Road in the Secondary Plan should not preclude an assessment of whether these lands are capable of conversion from employment uses as part of the MCR. If such lands are to be converted, then it would be appropriate to assess appropriate land use designations and height permissions, as well as the application of other proposed policies under the Secondary Plan.

The Secondary Plan proposes a maximum height limit of 25 metres for the property at 25 Toro Road. However, the property is also identified as within *Potential Additional Height Zone A*, which indicates that an additional 2 storeys (approximately 8 metres) could be added to the height with the provision of appropriate studies related to transportation, aviation, and shadows.

In addition to the future closure of the Downsview Airport, we are aware of the significant opposition to the proposed Secondary Plan by the fuel storage operators located along Finch Avenue West, east of Keele Street. In the event that significant revisions are made to the Secondary Plan to address the concerns of the fuel operators and potential conflicts with commercial and residential uses in proximity such as these, it may be that the structure of the Secondary Plan needs to be revisited and additional heights and densities be re-allocated within the plan area, including to the southeast quadrant of Keele and Finch.

The Secondary Plan proposes a future extension of Tangiers Road commencing south of Toro Road and extending south to St. Regis Crescent outside of the Secondary Plan area. This proposed extension could impact the properties at 25 Toro Road, 98-100 Ashwarren Road & 45 Lepage Court, and 125 Ashwarren Road. In particular, the final leg of the extension to St. Regis Crescent, appears to run through the existing building at 125 Ashwarren Road. Our client has not been provided with any timing or details as to when this proposed extension would be implemented. Uncertainty regarding the extension of Tangiers Road is not conducive to maintaining healthy employment uses within this area, as financial and physical investments need to be made in properties and leases entered into and renewed.

Please accept these comments which are being submitted for the consideration of City Council. Also, please provide us with written notice of the City Council's decision in this matter, and the consideration of any related matters by the Planning & Housing Committee, City Council, or any other committee of Council. Our contact information is provided herein.

Yours truly,
Overland LLP

Per: Daniel B. Artenosi
Partner
c. Client

