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Matt Armstrong, MSc PI, MCIP, RPP
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City Planning Division
North York Civic Centre
5100 Yonge St.
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Dear Mr. Armstrong:

**Re: Comments on Proposed Official Plan Amendment No 482
(Protected Major Transit Station Areas) and No 483 (Keele Finch Secondary Plan)
ONT GTA Properties Inc – 3940 Keele Street
Nordale Estates – 44 Romfield Drive**

Goldberg Group has been retained by ONT GTA Properties Inc., the owner of 3940 Keele Street (Keele Site), being the northwest corner of Keele Street and Finch Avenue West, currently occupied by a freestanding CIBC bank branch. We are also retained by Nordale Estates, the owner of 44 Romfield Drive (Romfield Site), which property is in the southwest quadrant of Keele Street and Finch Avenue West with frontage on Finch Avenue West, Keele Street, and Romfield Drive, excluding the corner site. This site is occupied by existing rental townhouses. Attachment 1 to this letter is a plan illustrating the properties owned by each of the above referenced owners.

In response to the ongoing Keele Finch Plus study process and the Notice of Public Meeting for the March 23, 2020 meeting (subsequently postponed) we are pleased to provide comments on behalf of our clients concerning the proposed OPA 482 (Protected Major Transit Station Areas (PMTSA) and OPA 483 (Keele Finch Secondary Plan (KFSP)).

Below are our comments at this time on OPA 483:

1. In relation to "New Link 2" shown on Map 6 (Public Street Plan), it is unclear how or if this new street may relate to access for the Keele site. While the north/south segment of this new street appears in the vicinity of the shared lot line between James Cardinal McGuigan Catholic High School and the lot immediately west of the Keele Site, it is unclear what the utility and viability of securing this road may be since its implementation appears to rely on other landowners, including the Catholic School Board, the north limit of a City park, and/or existing adjacent townhouse owners to the north. The feasibility of this road from an ownership and physical perspective does not appear to have considered factors such as grade differentials between ownerships to the north and south, locations of existing buildings, and the proximity of this new intersection to the Finch/Keele intersection. It is also unclear whether more optimal locations were explored where the road would intersect with Finch Avenue further west.

In view of this, we suggest that it is premature to show this road in the Secondary Plan until the feasibility of this road can be demonstrated or until alternatives are more fully explored. The feasibility should evaluate factors relating to transportation, ownership, existing and planned land uses and terrain. As such, we recommend that reference to this road be removed from the text and all mapping of the Secondary Plan.

If and when a major site in this area comes forward to develop, such as James Cardinal McGuigan Catholic High School, the policies of the Secondary Plan could include direction for how access to this potentially large redevelopment site should be considered from a transportation perspective. This one potential redevelopment site has the capability to accommodate its transportation needs

on its own site. In that circumstance, the City can retain the option to participate in the transportation solution with the use of part of its park, if there is a desire to link in an east west direction, with Sentinel Road.

2. Currently the Keele site enjoys access from both Finch Avenue West and Keele Street. As part of a future Zoning By-law Amendment (ZBA) application, we assume that access arrangements to the Keele site will be considered in light of the existing access this site currently enjoys and by considering the overall feasibility of New Link 2. In this regard we note the uncertainty that Policies 6.2.5 and 7.1.8.c may create in designing access to new streets that don't exist and may never exist.
3. Policy 7.2.17, states that the tower portion of the tall building will "*generally not be greater than 750 square metres...*". We suggest that this policy be revised to enable a larger tower floor plate size, where a proposed tower separation to adjacent existing or potential towers, are greater than 30 m. This flexibility in design gives the architect some level of creativity while protecting the public interest matters this standard is aimed to protect/achieve.
4. Policy 7.2.18 prescribes a tower separation of "approximately 30 metres", which may be appropriate on sites that can accommodate that and for larger tower floor plate proposals, yet may function to limit site capability and constrain site organization. It is also unclear why an additional tower separation standard is warranted in this Major Transit Station Area (MTSA) where the vast majority of the rest of Toronto operates with a 25 m tower separation. The significant public interest objectives in this MTSA are to optimize the land and infrastructural base, including the public investment in rapid public transit in this area. As such, to avoid unnecessary limitations on site developments, we suggest Policy 7.2.18 be revised from 30 m to 25 m, as it exists throughout the vast majority of the rest of the City by way of guideline.
5. Policy 7.3.6.c states that the maximum height at the southwest corner of Keele Street and Finch Avenue West will not exceed 27 storeys (approximately 84 m), with the tallest building at the corner and adjacent buildings progressively transitioning down in height and scale to 14 storeys to the south and 16 storeys to the west. We suggest that the maximum height of the corner be structured the same as the maximum height of the northwest corner due to the importance of this corner and its proximity to the transit hub. That way, adjacent buildings to the south and west can be in proportion to the corner, while accommodating the transition as set out in this policy and can better optimize the land and infrastructural base at this important location.
6. Policy 7.3.7.a imposes a control requiring 15 per cent of the GFA of a building to contain office, institutional and/or cultural uses. Policy 7.3.7.f conditions extra height, that is otherwise warranted, on the City being able to secure contributions toward additional community infrastructure and/or parkland to support the proposed additional growth. These two policies individually or combined place a potential unwarranted burden on a redevelopment proposal. We suggest revisions or deletions of these policies so that the owner be permitted to compose the land uses in its redevelopment in accord with the land use policies and permissions of its designation. If the Planning Act in effect at the time of a ZBA application entitles such requests by the municipality, then such requests should be made within the confines of what the Planning Act at that time enables/entitles.
7. Policies 8.3.6 sets out unit distributions and adds that "ideally", 2 or 3 bedroom units should be 87 square metres to 100 square metres. The Draft Growing Up Guidelines of 2017 already include these standards as suggested guideline standards. Adding this unit range as an Official Plan policy, even qualified as it is with the words "ideally", will in practical terms translate at the ZBA application stage into the requested municipal standard for 2 and 3 bedroom units. The policy objectives are already noted in the policy and contained in the Draft Growing Up Guidelines, and as a result, the unit size should not be referenced in OPA policy terms.
8. Map 5 (Public Realm Plan) identifies a "Conceptual New Park" fronting on Keele Street, immediately south of the 44 Romfield Drive site, or as part of it. Given the importance of the Keele Street and Finch Avenue West intersection to the overall urban structure of the OPA 483 secondary plan area, we suggest that this Map be revised by relocating this park south of the new link (New Link 4). The planning reason for this is that this potential new park should not have the unintended consequence of potentially limiting the site capability and optimization of this significantly located site, a site that is across the street from the transit hub and is well located in the MTSA. That could result in an under-utilization of this important site which is adverse to the Provincial policy

objectives for this MTSA and the secondary plan objectives for this corner. This potential new park could be located in the vicinity without compromising the important corner and adjacent site.

Below are our comments at this time on OPA 482:

1. Map 2 – (Minimum Densities, Finch West Transit Station Area) Identifies the conceptual road “New Link 2” as shown on Map 6 (Public Street Plan) of OPA 483. Our comments above concerning this new street apply similarly to OPA 482. It is unclear how or if this new street may relate to access for the Keele site, therefore recommend it be removed from this mapping.

Thank you for this opportunity for providing you with this input.

Yours truly,

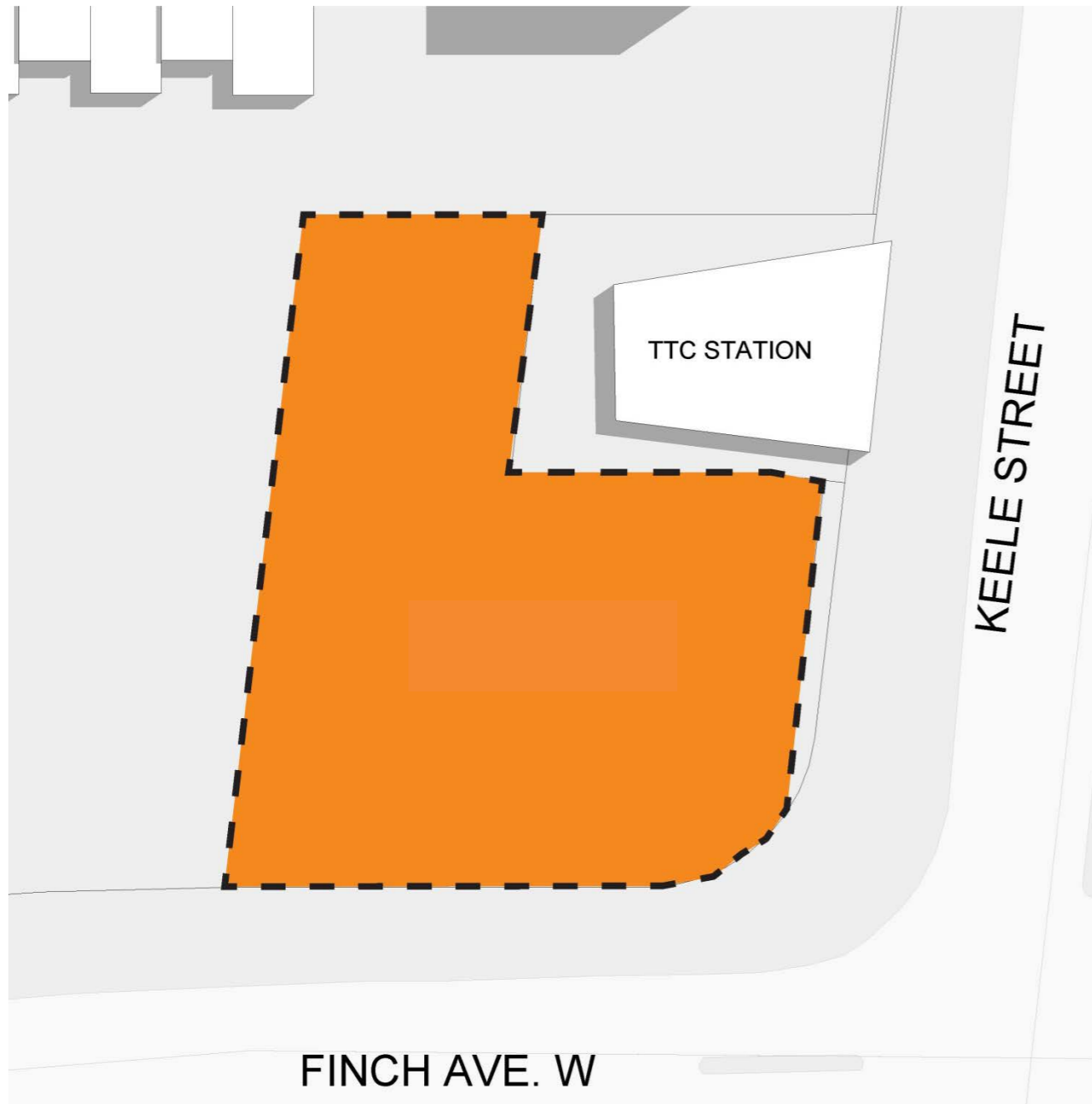
GOLDBERG GROUP



Michael S. Goldberg, MCIP, RPP
Principal

cc. Barry Stern
Cliff Korman

KEELE SITE



ROMFIELD SITE



ATTACHMENT 1

CLIENT'S SITES