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December 7, 2020

Planning and Housing Committee
Toronto City Hall
100 Queen Street West
10th floor, West Tower
Toronto, Ontario
M5H 2N2

Attention: Ms Nancy Martins, Administrator

**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**

Dear Chair Ana Bailoa and Members of Planning and Housing Committee:

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 filed the attached letter dated June 9, 2020. This letter is a follow up to the June 9, 2020 letter following a conversation late last week between my client, me, and Matt Armstrong of the City. As such, collectively this letter, together with our June 9, 2020 letter, are our clients' comments 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 addition to our June 9, 2020 comments concerning "New Link 2" shown on Map 6 (Public Street Plan), and based on more recent conversations with Matt Armstrong, we suggest that "New Line 2" and all related policies be removed from the PMTSA and the KFSP. This new road is speculative at best as it is reliant on the Catholic School Board redeveloping its property. Since there is no plan for such a redevelopment, given the large size of the school board property, and given that the Toronto Catholic District School Board (TCDSB) is in "strong opposition" to this aspect of the amendments, as expressed in its December 8, 2020 letter, we recommend that this Link 2 and its related policies be deleted from the amendments.

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. Policies 7.3.6.c and 7.3.6.e states that the maximum height at the southwest corner of Keele Street and Finch Avenue West will not exceed 27 storeys (approximately 84 m) and the maximum height at the northwest corner of Keele Street and Finch Avenue West will not exceed 32 storeys (approximately 100 m). Also, Policy 7.3.6.c prescribes that maximum buildings heights adjacent to the corner should transition to a maximum of 14 storeys (approximately 44 m) to the south, and 16 storeys (approximately 50 m) to the west.

Given the importance of these corners to the success of this Major Transit Station Area (MTSA), we find that the prescriptions of heights within the secondary plan to have the real potential to inhibit design flexibility and the sites' capability to optimize the use of each sites. Optimizing the land base and available public infrastructure, including public rapid transit investment, is directed in the Provincial Policy Statement and the Growth Plan, particularly within the core intersection of the MTSA. We therefore suggest that the height prescriptions set out in Policy 7.3.6 be removed in favour of a more criteria-based set of policies that would be tested at the Zoning By-law stage of approval.

3. It appears any amount of height above the base height set out in the secondary plan triggers Policy 7.3.7.a, which then imposes the requirement of 15 per cent of the GFA of a building to contain office, institutional and/or cultural uses. We understand this not to be a Section 37 contribution but simply a secondary plan requirement. We are concerned that such a requirement could result in the unintended consequence of disincentivizing sites to redevelop. This would be contrary to the intent of the Secondary Plan, the Provincial Policy Statement and the Growth Plan. As such, we suggest that such land uses should be included as possible community benefits, pursuant to Section 37, and the menu of such benefits or facilities should be expanded to include such matters as affordable housing units, among other things.

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

Yours truly,

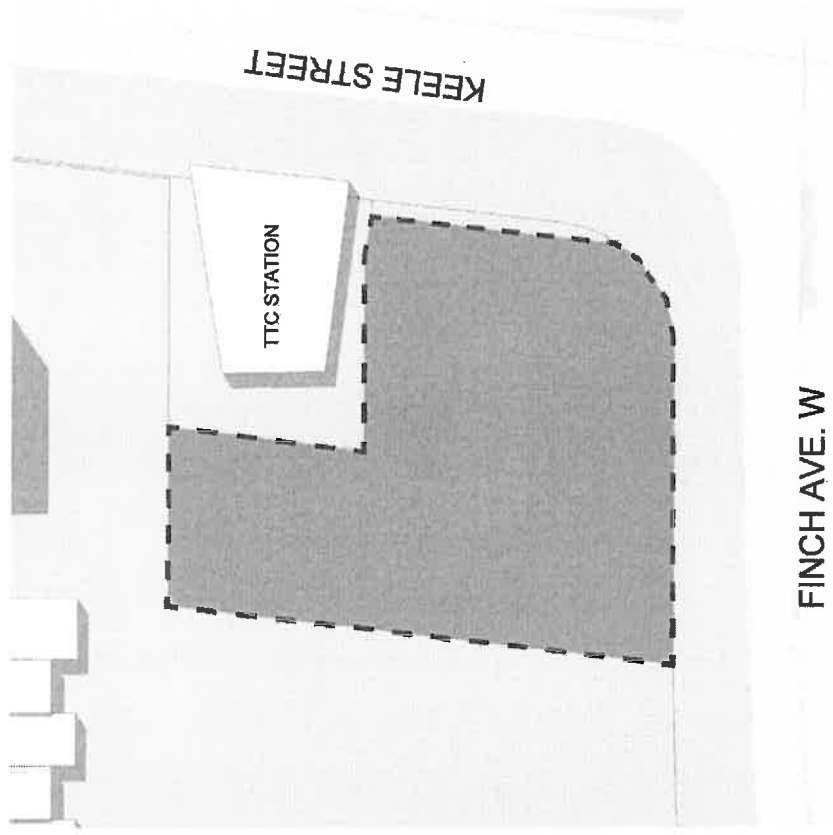
GOLDBERG GROUP



Michael S. Goldberg, MCIP, RPP
Principal

cc. Client
Matt Armstrong
Councillor Anthony Perruzza

KEELE SITE



ROMFIELD SITE



ATTACHMENT 1

CLIENT'S SITES