

September 2, 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  
20 Toro Road, Toronto  
2351530 ONTARIO INC.**

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Humphries Planning Group Inc. (HPGI) is the planning consultant for 2351530 ONTARIO INC., the registered owner of the property located at 20 Toro Road in the City of Toronto (the **Subject Property**). The Subject Property is located at the north-west corner of Toro Road and Tangiers Road, approximately 150-metres west of Keele Street and approximately 250 metres from Finch Avenue West. The site is currently developed with a 1-storey industrial manufacturing building with ancillary office and associated surface parking areas.

The City of Toronto Official Plan designates the Subject Property as *Core Employment Areas* and it is also identified as being located within the 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 Property is currently zoned *Employment Industrial - 'E 1.0'* and subject to site specific exception 318.

The proposed amendments to remove sensitive and non-employment land use in all former general zoning by-laws and the city-wide Zoning By-law for lands designated as Employment Areas in the Official Plan would delete a number of uses which currently apply to the Subject Property including, but not limited to:

- *Recreation Use;*
- *Performing Arts Studio Use;*
- *Commercial School;*

- *Adult Education School;*
- *University Uses;*
- *Hotel;*
- *Club;*
- *Community Centre;*
- *Public Library;*
- *Commercial Gallery;*
- *Museum;*
- *Commercial Recreation; and,*
- *Fitness Centre*

We provide the following concerns and comments for consideration as the City advances Phase 1 of the Zoning Conformity Study.

#### **Municipal Comprehensive Review and Employment Area Conversion Request**

The Owner, is a member of a landowner's group (the 'Village of Duke Heights Landowners Group') with holdings in the south-east quadrant of the intersection formed by Keele Street and Finch Avenue West. On July 30, 2021, the Village of Duke Heights Landowners Group submitted a request to the City of Toronto (Request No. 064) to convert their lands to non-employment uses as part of the City's ongoing Municipal Comprehensive Review. It is our understanding that the deadline for municipalities to achieve the required conformity under the Places to Grow Act and align the Official Plan with the Province's A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019) ("Growth Plan (2019)") is on or by July 1, 2022. As such, it is premature to undertake the zoning conformity exercise prior to the conclusion of the MCR and a decision made related to the landowner's site-specific conversion request. Additional changes to land use permissions may result from the conversion request, including the approval of non-employment uses on the Subject Property, and it would be presumptuous to remove some land uses in advance of a decision.

#### **Keele Finch Secondary Plan**

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 Property is 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 on the Subject Property. Recognizing that the Keele Finch Secondary Plan Area has 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 area, including the Subject Property. The proposed removal of certain uses, many of which are required to support and expand the function of a vibrant mixed-use community, would appear to be contrary to the to the visions for the Keele Finch Node and the amendment is in not in keeping with the long-term vision for the Secondary Plan area.

As a result of the concerns identified above, we respectfully request that the proposed zoning by-law amendment, either in its entirety or as it applies to the Subject Property, is referred back to City staff for further consideration and review.

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. 2351530 ONTARIO INC.