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November 23, 2021

Ana Bailão, Deputy Mayor & Chair, Planning and Housing Committee

Attention: Nancy Martins, Committee Administrator

City of Toronto
100 Queen Street West M5H 2N2

Dear Chair & Members of the Planning & Housing Committee::

PH29.10 - OUR PLAN TORONTO: KEELE-ST. CLAIR LOCAL AREA STUDY - DRAFT OFFICIAL PLAN AMENDMENT

Thank you for this opportunity to provide comments on behalf of our clients, Sequoia Grove Homes, the owners of 1799 St. Clair Avenue West (the subject site), regarding the staff report and draft Official Plan Amendment for the Keele-St. Clair Local Area Study (KSC LAS). Our site currently houses Delta Bingo and is the closest site to the planned SmartTrack station location, on the south side of St. Clair Avenue, fronting onto St. Clair and the future Davenport Road Extension. An application for an Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision to permit a mixed-use redevelopment of the subject site were submitted to the City in August 2021 and are currently under review by staff. An Employment Conversion Request was also submitted at that time, as part of the City's Municipal Comprehensive Review of the Official Plan.

Having reviewed the staff report and associated materials that the Planning and Housing Committee is scheduled to receive on November 25, 2021, we would like to offer the following comments:

APPROACH TO KEELE-ST. CLAIR AREA

Overall, we wish to thank staff for a report that is reflective of the ongoing dialogue between staff and the Sequoia Grove Homes team, as well as other neighbouring landowners. We are in full support of the overarching direction and policies that will foster the creation of a complete and equitable community in this area and appreciate of many of the elements and the judgment staff have shown in constructing this document.

The approach demonstrates continued support for the conversion of the subject site to a Mixed Use designation, and provides for transit-supportive density and complete communities that include market and affordable housing, a mix of residential and employment uses and an enhanced public realm, particularly in the vicinity of the new transit station. Our consistent position, which is generally reflected in the draft Official Plan Amendment (OPA), is that a flexible approach is crucial to ensuring that the Keele-St.Clair Area and the associated Protected Major Transit Station Area evolve in a way that reflects the City's vision.

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NON-RESIDENTIAL USES

We agree with City staff that developing a complete community requires an adequate provision of non-residential uses, particularly given the area's historic character as an industrial/employment area. We further concur with the identification of sites that are recommended for employment conversions, including the subject site, as Employment Priority Areas and feel that our client's proposal for redeveloping the site is generally aligned with these policy directions. Our concern is that the policies articulated in support of employment uses may not be aligned with policies that constrain density and built form. These concerns are articulated further below, in this letter. In summary, it is our opinion that overly prescriptive built form constraints may inhibit the ability of sites to achieve large amounts of employment uses, community facilities and affordable housing.

For example, the FSI/gross floor area minimums for non-residential uses in Policy 6.1 may present challenges for many sites, particularly given the further constraints of enumerated uses listed in Schedule A. Further, it seems onerous that community facility uses are among those listed in Column 3 as not counting towards the minimum non-residential gross floor area, even while Policy 4.1 establishes that developments may be required to provide on-site community services facilities. Clearly, the growth envisioned for this area will require both new and upgraded community service facilities, but sites that provide them should not be penalized for doing so within a finite envelope of gross floor area that is also expected to include non-residential uses and affordable housing.

AFFORDABLE HOUSING

As with non-residential uses, we believe that our clients' proposal for the subject site already meets the general intent of the draft policy directions presented in the OPA, as well as the Inclusionary Zoning policy and framework approved by Council earlier this month.

However, given the consistent need to have a flexible approach we think it is important to ensure that the requirements for affordable housing are not working against the policies related to non-residential uses and/or those related to height and density, in order to ensure that both individual developments and the collective neighbourhood are able to achieve the full range of policy goals. If a site is expected to provide substantial amounts of both affordable housing and non-residential uses (and community service facilities, potentially), this should be reflected in the provision of greater flexibility with regards to height and densities.

DENSITY, HEIGHT AND ANGULAR PLANES

We are in support of the general policy direction, including establishing a minimum FSI, in order to promote transit-supportive densities, and flexibility through the establishment of general maximum height ranges in each of the land use districts. However, Proposed Policy 7.7(a) establishes maximum heights "generally ranging from 20-35 storeys," in the Station South area while the maximum heights in the immediately adjacent Station Centre area range from 30 to 40 storeys (Proposed Policy 7.5(a)). Given that the subject site is directly across the street from the proposed station location, the rationale for limiting the maximum heights on the south side of St. Clair Avenue would appear unclear, particularly given that heights greater than 20-35 storeys are already being approved in proximity to transit stations elsewhere in the City. Heights can still peak appropriately in the vicinity of the station site, establishing a key node in the skyline, and provide a good transition to established neighbourhoods in a manner that mitigates any impacts

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of this proposed height and density, without further restricting the heights on the north side of St. Clair. In short, this form should be reflected symmetrically on either side of St. Clair Avenue.

Correspondingly, the establishment of the 45-degree angular plane directly within the sub-sections of Policy 7.3, 7.4, 7.5 etc. has the effect of establishing de facto, site-specific maximum heights. While we embrace the need to ensure new development provides contextually appropriate heights and an adequate and appropriate transition to lower-density areas, we believe that angular planes are but one tool for providing this transition and are not always necessary or even useful in mitigating impacts of height and density, particularly when tall buildings are located far to the north of the nearest low-rise structure, as is the case with the proposed development.

In this instance, a strict application of the angular plane would remove 10 storeys from a tower across the street from the new proposed SmartTrack station. What is of note here is that this reduction in height does not in any way reduce the incremental shadows on the low-rise neighbourhood and does not improve any issues arising from height, overlook and privacy. In the case of our clients' development, we can mitigate these impacts by locating tall buildings well away from the low-rise neighbourhood, stepping back the massing from the base and articulating the towers to minimize overlook. This area is going to change and urbanize rapidly. It will afford many people the opportunity to live work and play in proximity to new transit and allow many more new Torontonians to find a home in this City. It is a fundamental question of access to the city and equity that should drive considerations of how and when development is restricted. With that in mind, it is our submission that transition of height and density limits are more usefully evaluated from an impact basis and that the toolbox for limiting or eliminating these impacts should embrace many possible solutions.

CONCLUSIONS

A great deal of thought has gone into the development of the draft Official Plan Amendment for the Keele-St. Clair Local Area, including substantial regard for the concerns raised by stakeholders in the early stages of consultation. Although we are appreciative of the approach taken by staff and largely in compliance with the objectives, we also believe there are some specific adjustments that can be made in order to ensure the full realization of the vision for a complete, transit-oriented community.

We also understand that crucial community and stakeholder consultation and a technical review will be undertaken in the coming months, before the OPA is finalized. We look forward to continuing to engage constructively and successfully with staff and the area Councillors through that process and working with the City to achieve the city building goals for this neighbourhood.

Respectfully submitted,

IBI Group Professional Services (Canada) Inc.



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