



Date: June 29, 2022

Nancy Martins, (
Administrator, (
Etobicoke York Community Council, (
100 Queen Street West, 2nd Floor, (
Toronto, ON
M5H 2N2 (

Dear Members of Community Council,

**Re: Comments Regarding Draft Official Plan Amendment 571
 (Mount Dennis Secondary Plan)
 1 – 9 Oxford Drive**

We are the planning consultants representing Trolleybus Urban Developments, with respect to their property municipally known as 1 – 9 Oxford Drive, herein referred to as the subject site. On February 14, 2022, an application for an Official Plan Amendment and Zoning By-law Amendment was submitted to City Staff for a proposed 26-storey residential apartment building. The application is currently under review.

Over the past several months, we have been monitoring the Mount Dennis Planning Framework Study and have participated in various community consultation meetings and workshops. As the subject site is located within the boundaries of the proposed Mount Dennis Secondary Plan, herein referred to as the ‘Secondary Plan’, we have reviewed the document to understand our proposal’s context as it compares to the intended vision of the Secondary Plan.

Upon our initial review, we are pleased with the City’s progressive and strategic stance that has been taken to promote effective and efficient city building across Mount Dennis. We agree with the City’s redesignation of the subject site as a *Mixed Use Growth District* that will accommodate the majority of new growth in the Plan area including a mix of tall and mid-rise buildings with maximum heights of 45-storeys and the tallest buildings located closest to the rail corridor and Mount Dennis Station.

However, in our review of the Secondary Plan, we have identified a select number of policies that, in our opinion, are overly prescriptive, and would be better suited to the level of detail found in Zoning By-laws or Urban Design Guidelines. In particular, specific policies that guide built form have applied numerical standards where other guidelines already existing such as the Tall Building Design Guidelines. Moreover, these policies, in our opinion, are overly restrictive and may minimize redevelopment potential of a site due to specific building constraints (e.g. grade, water table, etc).

The list of identified policies is provided below along with a brief commentary.

- The content of policy 5.3, 6.14.8 and 8.18 should be consistent with existing Official Plan Policies.

The directives provided in Section 5 – Land Use which address the provision of non-residential uses in *Mixed Use Areas* eludes to the requirement of non-residential uses in a development if located within *Mixed Use Areas* which may not always be appropriate. In our opinion, it should be consistent with the Official Plan for *Mixed Use Areas* which provides for a potential range of uses (not a requirement). In addition, the term “maximize” in Policy 6.14.8 and 8.18 for the purposes of shadowing should reflect the “adequately limit” language within the Official Plan.

- The location of potential pedestrian connections on Map 5 – north of Weston Road

The conceptual Parks and Public Realm Plan shown on Map 5 and discussed in Section 6 of the Secondary Plan illustrates a comprehensive network of connections including mid-block connections, pedestrian thoroughfares, and rail crossings. Moreover, the proposed pedestrian connection that runs generally parallel and north of Weston Road would be largely contingent upon land assemblies and in its current position bisects numerous detached dwellings. Additional language to reinforce the conceptual nature of this map is encouraged.

- The prescriptive nature of Proposed Policies 6.23, 8.14.3, 8.14.4 and 8.14.5.

The intent of Official Plans (and Secondary Plans) is to establish policies that provide a land use planning framework and high-level vision for how areas should grow and develop over time, including land use designations, compatibility, transition and character, among other matters. They should not consist of specific prescriptive, mandatory or numerical regulations – that is the purpose of the zoning by-law. In this instance, the specific built form policies of 8.14.3, 8.14.4 and 8.14.5 provide detail that is already specified with the existing Tall Building Urban Design Guidelines.

- Proposed Policy 8.25 is overly restrictive and limits redevelopment potential.

Underground parking located outside of the building footprint and beneath landscaped areas is a long-standing and widely accepted condition across the City. There are several methods used to ensure tree growth and longevity, including the use of planters and soil volume plans. Moreover, stratified land

conditions can be necessary to accommodate sufficient areas to establish appropriate built form relationships. In our opinion, requiring unencumbered landscaped areas unnecessarily impacts the potential functionality and size of underground parking areas and may inadvertently limit redevelopment potential.

- Proposed Policy 12.7 is premature.

The Secondary Plan should not seek to elevate non-statutory documents that provide guidance on matters of building design and are not determinative (i.e. Urban Design Guidelines), to the level of policy. In our opinion, it is not appropriate for the proposed Mount Dennis Secondary Plan to contain policies that reference Urban Design Guidelines when the non-statutory document has not yet been adopted by City Council; or to specify that development will be evaluated in accordance with such guidelines.

We would like to thank you for your consideration of the above comments and look forward to continued discussions with City Staff on the implementation of the Mount Dennis Secondary Plan. Should you have any further inquiries of the above comments, please reach out to the undersigned or Charlie Smith of our office.

Sincerely,



Tyler Grinyer, MCIP, RPP. (