



PLANNING AND URBAN DESIGN

04 July 2022

Planning & Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Attention: **Chair and Committee Members**
 Planning and Housing Committee

Dear Chair and Committee Members

RE: **Agenda Item PH35.16:**
 Official Plan Amendment 570 (SASPs 702 & 703)
 Milvan Rumike & Duncanwoods Protected Major Transit
 Station Area Delineation

WND File: 19.586.01

We are the planners for 2450 Finch Avenue West (the “Owners”), the Owners of 2450 Finch Avenue West in the City of Toronto (the “Subject Site”). This letter is in response to the recommendations contained within Agenda Item PH35.16, regarding the delineation of the Milvan Rumike and Duncanwoods Finch West LRT Stations’ Protected Major Transit Station Area (“PMTSA”), as proposed in Official Plan Amendment (“OPA”) 570 and draft Site and Area Specific Policies (“SASPs”) 702 & 703.

The Subject Site is located within an overlapping portion of the proposed PMTSAs, with both applying a proposed minimum density of 0.3 FSI to the Subject Site (see **Appendix 1**), which in our opinion, does not adequately respond to the requirements of the Provincial Policy Statement 2020 (the “PPS”) and Growth Plan for the Greater Golden Horseshoe, 2019 (as amended) (the “Growth Plan”), nor reflect the City of Toronto Official Plan’s (the “OP”) overall objectives of supporting reurbanization along rapid transit routes.

Provincial Policy Statement 2020

The PPS provides policy direction regarding matters of Provincial interest in Ontario’s land use planning system. Policy 1.1.1 of the PPS promotes the creation of “*healthy, livable, and safe communities*” through intensification, transit-supportive development, climate change resiliency, and efficient land use patterns incorporating a range of residential, employment, institutional and open space land uses.

Policy 1.1.3.4 further promotes appropriate development standards which facilitate “*intensification [and] compact built form.*” Policy 1.3.1.d) further encourages “*compact, mixed-use development that incorporates compatible employment uses.*”

Policy 1.7.1 of the PPS “*encourages building a sense of place with well-designed built form*” and promotes a multimodal transportation system, which reliably moves people and goods. Policy 1.8.1 of the PPS further seeks to promote climate resilience through compact land use and built form, employment and housing intensification, and focusing major employment to areas well served by transit.

Growth Plan for the Greater Golden Horseshoe, 2019 (as amended)

The Growth Plan’s overarching direction is to promote the creation of *complete communities* with a mix of uses, an attractive and robust multi-modal transportation network, and public services and infrastructure to support a healthy and livable region. A key feature of complete communities is a *compact built form* which includes the efficient use of land, a mix of land uses near transit, pedestrian friendly public realm, and can include “*multi-storey commercial developments*”.

Growth is generally targeted towards existing urban areas, and in particular, to *Major Transit Station Areas* (“MTSA”) within them, such as the proposed Duncanwoods & Milvan Rumike PMTSAs. MTSA’s are to be planned with “*transit-supportive densities*”, land uses and built forms defined in-part as development with a “high level of employment and residential densities.” Planning for MTSA’s will “*maximize... the number of potential transit users... walking distance of the station,*” “*provide alternative development standards such as reduced parking,*” and will prohibit “*land uses and built form which adversely effect the achievement of transit-supportive densities.*”

Intensification of employment uses is as important as residential growth within MTSA’s and the Growth Plan in general. Policy 2.2.5.1.a) encourages employment intensification to support economic competitiveness and Policy 2.2.1.5.2 directs “*major office [uses]... to major transit station areas.*” Policy 2.2.5.4 further directs that surface parking should be minimized, with *active transportation* and *transit-supportive* built forms encouraged.

City of Toronto Official Plan

The Subject Site is located within a *General Employment Area* on Map 13 of the OP and an *Employment Area* on Map 2, wherein Policy 2.2.4.3 states “*A more intensive use of lands in Employment Areas for business and economic activities will be encouraged to make better use of a limited supply of lands available for these activities*” Policy 2.2.4.4 further directs that “*Employment Areas will be enhanced by:*” “*encouraging a range of business activities..., promoting a high quality public realm,*” comfortable street network, transit use, pedestrian activity, cycling and efficient goods movement.

The policies of Section 2.4 of the Official Plan additionally encourage reducing auto-dependency for travel within the city. Policy 4.6.7 of the OP directs that while adequate parking is to be provided within *Employment Areas*, this parking should be located away from the street and development should mitigate the impacts of traffic generated by these employment uses.

Section 3.1.1 of the Official Plan promotes a safe pedestrian, transit and cycling supportive public realm with “*street orient development [and] buildings fronting onto... street edges.*” The policies of Section 3.1.2 further directs that the built form of new development should “*frame and support adjacent streets.... with good street proportion,*” provide main entrances fronting onto these streets, limit surface parking and organize servicing and parking functions to minimize impacts on the “*attractiveness of the public realm*”.

Opinion & Conclusion

In our opinion, 0.3 FSI is an inappropriately low minimum relative to the Subject Site’s proximity to a new rapid transit station, within a Protected Major Transit Station Area. We understand the purpose of this low minimum is intended to support the typical types of employment uses found within these areas today (i.e. single-storey industrial and commercial buildings with significant amounts of surface parking). However, the necessity of implementing a low minimum FSI of 0.3 directly adjacent to a transit station in order to protect for these typical employment uses is evidence that the status quo is inconsistent with the emerging urban attributes and land use pressures of this area, and that policy intervention is necessary to ensure an appropriate land use, intensity, and resulting built form is achieved on the Subject Site.

The current building on the Subject Site has an approximate FSI of 0.5. In our opinion, requiring future development of the Subject Site to achieve only a 0.3 FSI, as proposed in OPA 570, would constitute policy acceptance of a reduction in employment space and intensity on the Subject Site. This contradicts the above-noted PPS, Growth Plan, and OP policies which expressly seek to intensify employment uses and expand the range of economic activities supported, particularly within MTSA.

Further, the proposed minimum FSI of 0.3 would allow for 70% of the land to remain vacant or occupied with uses such as outdoor storage or surface parking, which contradicts the above noted PPS, Growth Plan and OP policies which seek to limit surface parking, reduce auto-dependency, and promote transit use and active transportation.

In our opinion, development which is permitted to achieve only 0.3 FSI would likely take the form of a smaller 1-storey building than currently exists, which would not promote a sense of place, would not represent a compact form, and would not provide “good street proportion” along Finch Avenue West, as directed by the PPS, Growth Plan, and OP, nor would it promote or frame a pedestrian-focused public realm. A 0.3 FSI would not represent an efficient use of land in proximity to a MTSA, would not facilitate a *compact built form*, and would not maximize of the number of potential transit users.

In our opinion, a minimum density of 0.5 would more appropriately respond to the existing uses on the Subject Site, and better recognize the *General Employment* designation, as opposed to the *Core Employment* designation that applies to the north which currently is proposed with the same 0.3 FSI minimum density. As the Subject Site is located within an overlapping portion of both proposed PMTSAs and is within a 250-metre walk of both stations (directly along Finch Avenue West) a higher minimum density would more appropriately distinguish its appropriateness to accommodate transit-supportive intensification from the *Core Employment Areas* to the north and east, which are located further from transit, along a freight rail corridor, and are better suited for long-term low-density employment activities.

To the east and west of the Subject Site, several lands fronting Finch Avenue West are proposed in OPA 570 to be designated with FSI minimums of 1.5 or greater. In our opinion, the proposed minimum FSI of 0.3 on the Subject Site establishes a density “trough” which does not appropriately recognize the Subject Site’s similarly excellent transit access nor its appropriateness for intensification in comparison to surrounding *Core Employment Areas*, as discussed above.

That being said, in our opinion the more appropriate approach would be to provide a much higher minimum FSI of at least 3.0 in conjunction with a broadening of the permitted uses on the site to facilitate mixed use development, including residential uses, which would provide for both new jobs and housing. To that end an Employment Conversion request has been submitted and is under review by the city, and this process could be leveraged to achieve more appropriate density on the Subject Site. The Subject Site’s designation of *General Employment* further supports this revision given it already allows a broader mix of uses than the *Core Employment* uses to the north, and the site is on the edge of the employment area along a major street, making it different than the area to the north and more appropriate for higher densities.

We trust that this letter is informative in your review of OPA 570 and SASPs 702 & 703, and would be happy to discuss any questions you may have.

Yours very truly,

WND associates
planning + urban design



Andrew Ferancik, MCIP, RPP
Principal

Appendix A

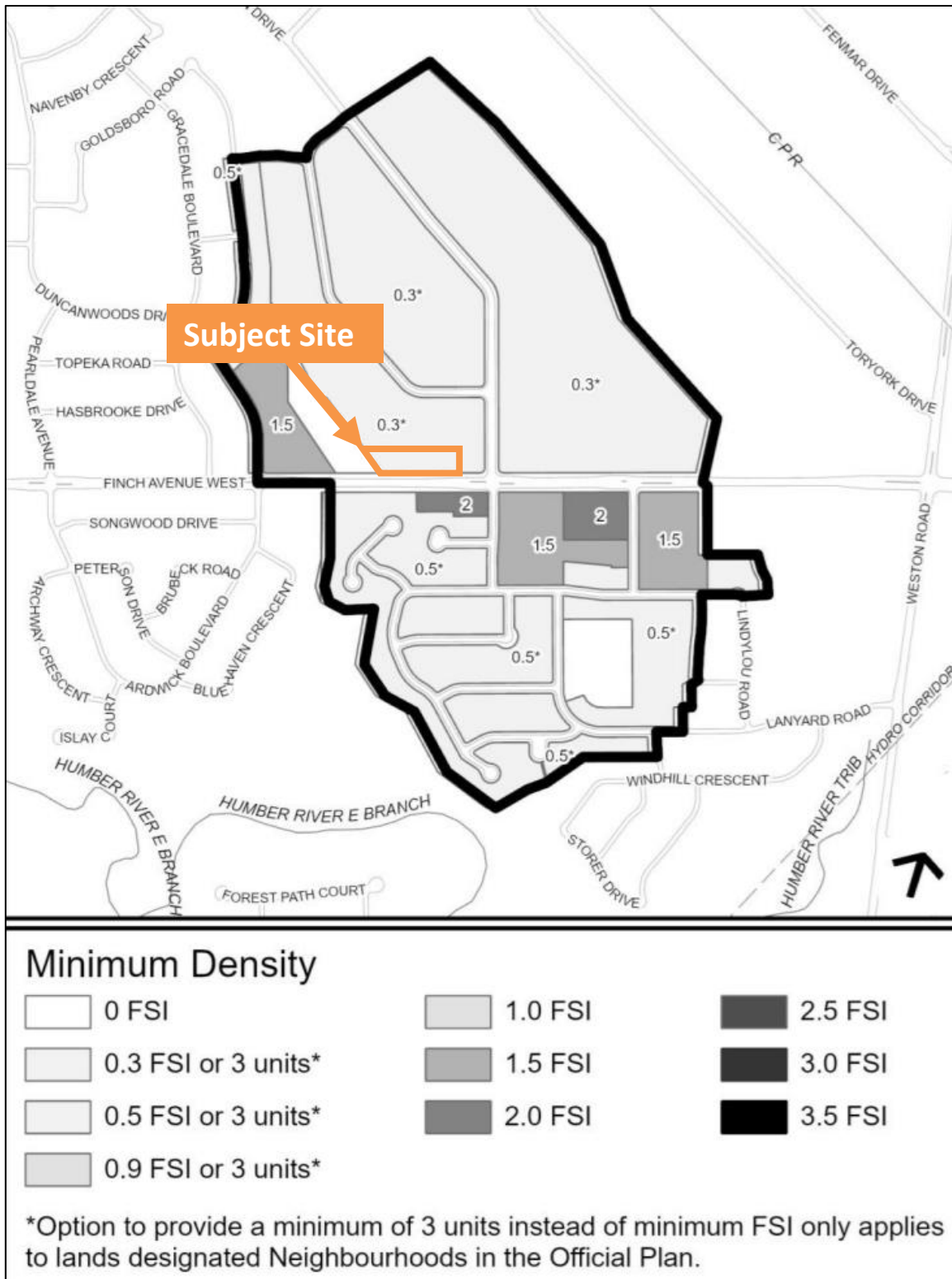


Figure 1: Subject Site located within the Milvan Rumike PMTSA as proposed by OPA 570/SASP 702.

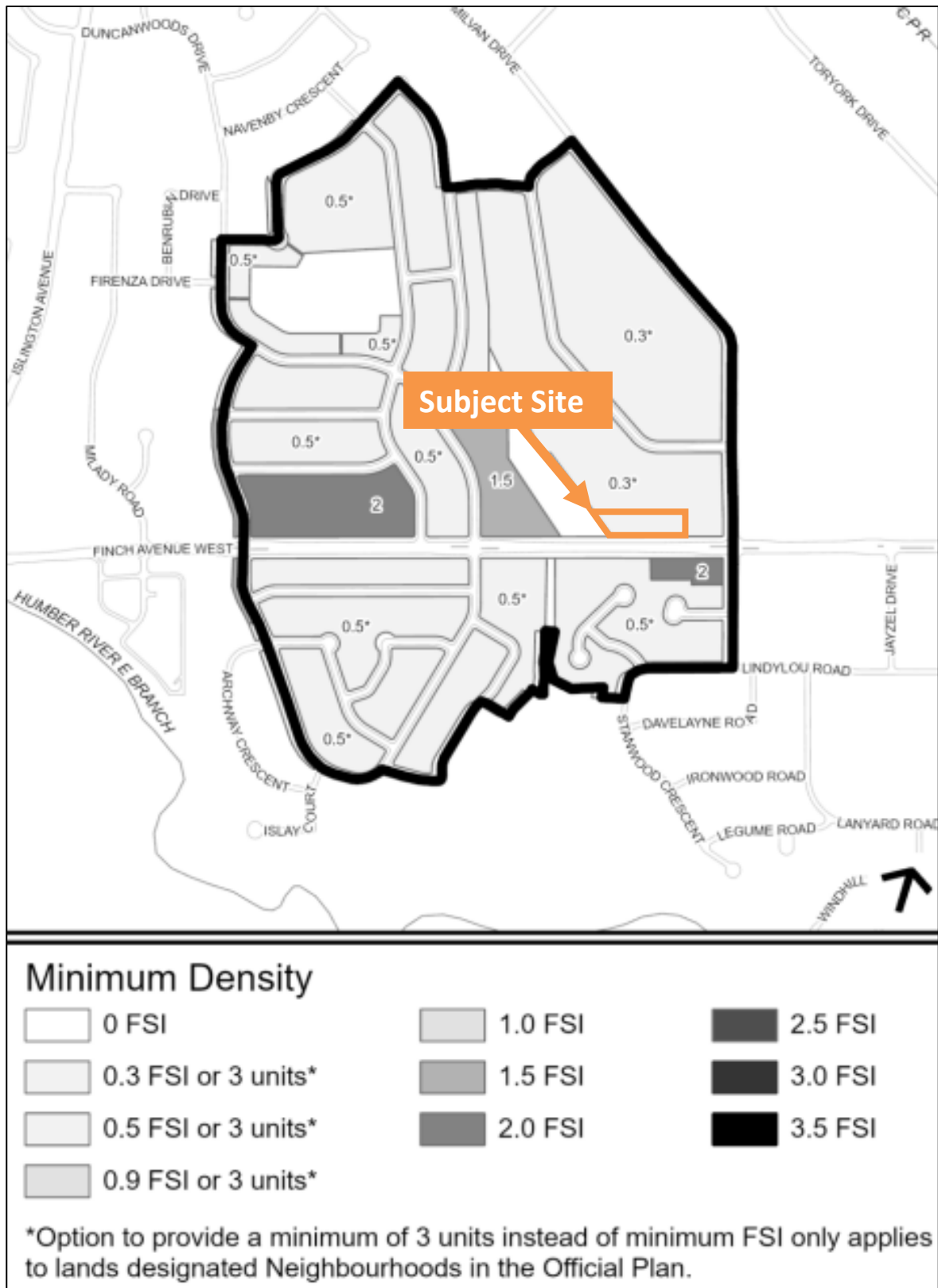


Figure 2: Subject Site located within the Duncawoods PMTSA, as proposed by OPA 570/SASP703