



PLANNING AND URBAN DESIGN

4 July 2023

City Clerk
Administrator Planning and Housing Committee
10th Floor, West Tower, City Hall
100 Queen Street West Toronto, ON M5H 2N2

Attention: Nancy Martins

Dear Ms. Martins,

**RE: PH5.3 - Our Plan Toronto: Recommendations on Seventy
Employment Area Conversion Requests and Chapter 7 Site
and Area Specific Policy Review - Final Report
3765-3777 Keele Street and 10 Lepage Court**

City ECR File No. 088
WND File No. 21.541

WND Associates has been retained by Sorbara Group to assist in its Employment Areas Conversion Request for the lands known municipally as 3765, 3771, and 3777 Keele Street and 10 Lepage Court in the City of Toronto (the "Subject Site"). This letter is provided with respect to the Employment Conversion Request (No. 088) submitted on 3 August 2021 (the "Proposed Conversion") and further to the recommendations of Item PH5.3 contained within the Staff Report, dated 16 June 2023, being considered by Planning and Housing Committee on 5 July 2023.

Background

The Subject Site is a corner site, located at the northeast corner of Keele Street and Lepage Court, and comprises a collection of four contiguous properties, municipally known as 3765, 3771 and 3777 Keele Street and 10 Lepage Court, located in the York University Heights neighbourhood, of the Former City of North York. The Subject Site is located along the western boundary of the *Employment Area* along Keele Street, presently containing retail, restaurant, and automotive uses, consisting of 4 single-storey buildings, with associated surface parking areas.

The Proposed Conversion seeks to amend the Official Plan by redesignating the Subject Site from *General Employment Areas* and *Core Employment Areas*, to *Mixed Use Areas* or *Regeneration Areas*. A development concept was prepared by Graziani and Corazza Architects and submitted in support of Proposed Conversion, contemplating a single 10-storey "C shaped" building, containing a 38,299 square metres gross construction area for residential uses and a 1,214 square metre gross construction area for commercial uses, for a total gross construction area of 39,513 square metres and a floor space index (FSI)

of 5.34. The concept contemplates a total of approximately 550 residential units which will range in unit size and mix.

Following the initial submission, and the receipt of comments from the City, supplementary response materials were provided for further review and consideration in advance of City's Staff's final assessments and determination regarding the Proposed Conversion.

Rationale in Support of the Conversion

The Proposed Conversion is well-supported by the land use policy context and technical assessments applicable to the Subject Site. More specifically, and as discussed within the initial and supplementary materials:

- This request adequately addresses the conversion criteria of the Provincial Policy Statement, Growth Plan for the Greater Golden Horseshoe and City of Toronto Official Plan to the extent they can be feasibly demonstrated by the development concept and supporting reports. The employment area conversion request is appropriate taking into consideration the existing planning policy framework noted above, the existing and planned investment in higher order public transit infrastructure, and the Subject Site being located within a Protected Major Transit Station Area.
 - The Subject Site is located within walking distance of a higher-order transit interchange point (Finch West Station) providing access to two rapid transit lines (Line 1 and Finch West LRT), and is near an existing subway/GO interchange at Downsview Park Station. Introducing residential uses through the conversion would serve as an improvement over the existing automobile-oriented retail uses presently contained on the Subject Site, enabling new residents to have immediate access to frequent subway, LRT, Regional Rail and bus service.
 - The Proposed Conversion would improve the area transportation network, consolidating eight existing curb cuts, providing an improved public realm and new sidewalk along the north side of Lepage Court, and would implement portions of a future mid-block connection, encouraging active transportation and movement across the site and the interior of the *Employment Area*.
 - The Subject Site is on the periphery of the *Employment Area* and is located across from and adjacent to existing residential neighbourhoods and is within walking distance of a variety of community services and facilities including schools, community centres, places of worship, and day cares, in addition to being well positioned in relation to existing City parkland and natural areas, including playgrounds and facilities, and is directly adjacent to a large food and department store, providing proximate access to daily needs.
 - The Subject Site is bounded by a unique area-specific planning policy framework, where recent Council approved OPA 482 (Finch West PMTSA) and Council approved in principle OPA 483 (Keele Finch Secondary Plan), and would contribute towards meeting and exceeding the minimum population and employment targets, gross development block density targets, and minimum built form standards, to leverage the area's existing and planned public investments in higher order transit infrastructure.
 - The Proposed Conversion would facilitate the redevelopment of the Subject Site with a compatible mid-rise mixed use building, supporting a diversity of housing types by increasing the
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supply and mix of available housing options, which would complement the adjacent mixed uses planned along the Keele Street corridor, and build on the recent Council approved policy framework for the Keele Finch area. The Conversion Request is an envisioned and practical next step towards contributing to a complete, transit-oriented community along the Keele Street corridor, of the Finch West Protected Major Transit Station Area.

- The Proposed Conversion of the Subject Site retains and expands the amount of employment floor area than is currently accommodated on the site by approximately 30%, with the potential to accommodate 2.5 times more jobs (72 jobs) on the Subject Site in comparison to existing conditions.
- There is a demonstrated multi-faceted need for the conversion, the lands are not required for the restricted employment purposes for which they are designated and are not currently being used in that fashion, the City will maintain sufficient employment lands to accommodate forecasted employment growth, the proposed uses would not adversely affect the overall viability of the employment area and will contribute to the achievement of minimum intensification and density targets, as well as other planning policies with respect to complete communities, economic competitiveness and other matters.

Staff's Recommendations

Despite the above noted supporting rationale and materials which have been reviewed by City staff, the Final Assessment of the Proposed Conversion recommends retention of the Subject Site as *General Employment Areas* and *Core Employment Areas*. In our opinion, maintaining the Subject Site in these designations does not adequately respond to emerging provincial policy direction for *Employment Areas*, does not appropriately implement the mixed-use intensification directives of the Provincial Policy Statement, 2020 and Growth Plan for the Greater Golden Horseshoe, 2019, and does not reflect the direction of the Council approved in principle Keele Finch Secondary Plan.

In our opinion, by keeping the Subject Site as part of the *General Employment Areas* and *Core Employment Areas* designations it is unlikely that development would take on a pedestrian-oriented and transit supportive character, as is envisioned by the Keele Finch Secondary Plan, and would poorly capitalize on the public investment in existing and planned infrastructure such as municipal services, community facilities, roads, and transit, especially when considering the area's access to multiple higher-order transit lines, providing local and regional transit service connectivity within walking distance.

Conclusion

In our opinion, on a standalone basis, a conversion of the Subject Site would be appropriate, represent good planning, and would align with the existing and emerging surrounding context and applicable policy framework. The Subject Site exhibits many of the site and area-specific contextual qualities cited in previous Council-supported conversions (and in some respects, has even better qualities), including an existing residential and planned mixed use character along the adjacent arterial road frontage, compatible existing and planned land uses within the adjacent the *Employment Area* lands, the availability of nearby community services and facilities within the surrounding residential neighbourhoods, the retention and

expansion of non-residential employment space within the converted lands, and proximity to a future higher-order interchange point comprising of two new transit lines at the Finch West Subway Station.

The request to convert the Subject Site from *General Employment Areas* and *Core Employment Areas* to *Mixed Use Areas* or *Regeneration Areas* has merit, represents good planning, and should be considered as part of the City's Municipal Comprehensive Review of the Official Plan. We respectfully request that Planning and Housing Committee reconsider City staff's recommendations and instead support the Proposed Conversion. Alternatively, we would request that Planning and Housing Committee to direct City staff to undertake further consultation with area landowners on the establishment of a *Regeneration Areas* designation and commence a study of the appropriate longer-term land use policy framework for the Subject Site and surrounding lands.

We trust this information is of assistance in your consideration of this conversion request and should you have any questions, please do not hesitate to contact the undersigned or Thomas Dybowski at extension 127 or tdybowski@wndplan.com.

Yours very truly,

WND associates
planning + urban design



Andrew Ferancik, MCIP, RPP
Principal