

February 23, 2024

Etobicoke York Community Council
Etobicoke Civic Centre
399 The West Mall
Toronto, ON M9C 2Y2

Dear Chair and Members of Community Council:

Re: Item EY11.1, Jane Finch Secondary Plan and Urban Design Guidelines – Final Report

Urban Strategies Inc. is acting on behalf of Brad-Jay Investments Ltd., the Owners of the Jane Finch Mall, in advancing an Official Plan Amendment (OPA) and a Zoning By-Law Amendment (ZBA) for 1911 Finch Avenue West (“the Site”) (23 184369 WET 07 OZ and 23 238316 WET 07 OZ). We are writing with respect to the City’s Jane Finch Secondary Plan and Urban Design Guidelines, which will introduce a comprehensive planning framework for the area around the Jane and Finch intersection. This area includes the Site, which is located at the southeast corner of the intersection and currently home to a one-storey commercial shopping centre.

The applications for the Site – which were submitted in August 2023 (prior to release of the Draft Jane Finch Secondary Plan) and deemed complete on January 23, 2024 – aim to establish a long-term framework for incremental change. The applications were made following more than two years of engagement with the local community through the “**jfm+**” visioning process which shaped the Proposal.

The **jfm+** process went beyond the typical development planning engagement process for a privately-owned site, engaging early with community members and at key stages throughout the development of the Proposal and long before submitting a formal development application submission to the City. Over two and a half years, the **jfm+** process engaged 2,000+ community members – including representatives from 35+ community organizations – through four phases of pre-application engagement. Engagement methods included individual interviews, casual drop-in sessions hosted at the **jfm+** Community Engagement Space in the Mall and staffed by local residents, stakeholder meetings, walkshops, and open community meetings. Key to delivering this process was an engagement team of over 15 Community Animators: local residents and leaders who are actively engaged in the Jane and Finch community. The extent of community engagement and what we heard is documented in the submission materials supporting the application and on the dedicated [jfm+](#) website.

In recognition of the City’s ongoing Jane Finch Initiative (JFI) process, which launched in late 2020, several meetings were also held with the City’s JFI staff team and the JFI consultants, as well as the local Councillor, to engage them on the evolution of the Proposal and work to align with the JFI process where possible. In addition, four presentations were delivered to the JFI Community Advisory Committee (CAC). Our team appreciates the collaboration shown by the JFI team throughout the process, the open lines of communication, and the sharing of feedback, all of which helped shape the Proposal as well.

The results of this collaboration were evident in the Draft JFI documents that were released on November 24th, 2023, including a Secondary Plan, Urban Design Guidelines, and Community Development Plan Principles and Actions. In reviewing these documents, we found there was much alignment between the City’s emerging policy framework and the Proposal for the Site, including the location of new streets and parks, the approach to phasing, and more. However, some discrepancies and related areas of concern remained between the City’s draft materials and the Proposal for the Site, and we appreciated the opportunity to outline these areas of concern with City Staff at a meeting on December 15th, 2023, as well as within a subsequent comment letter.

We were pleased to see Staff's consideration of many of our comments, as reflected in the revised Secondary Plan that was released in February 2024 and has been put forward for Council's consideration. However, one outstanding issue does remain, being the widening of Finch Avenue West to "45m and over", as indicated in Attachment 1, Amendment 2.2.3.

Our team met with the JFI team and City Planning three times between launching the jfm+ process in 2021 and making the application in August 2023. We also went to great lengths to receive the April 2020 Route Works drawings (issued for construction of the LRT) from Metrolinx to ensure we were working from the most updated information on the adjacent Finch ROW. None of these meetings or materials raised the need for any widening on Finch Avenue, including at our formal pre-application meeting. We were surprised, therefore, to read of the proposed widening of Finch Avenue West; first proposed for 40m in the November 2023 Draft Secondary Plan and later revised to "45m and over" in the February 2024 Secondary Plan. Extensive work has gone into the conceptual and technical planning of the Site over the last three years based on the in-force Official Plan schedule that did not indicate any widening, as well as the April 2020 Route Works. The adjustments resulting from this widening would have significant impacts on the building podiums (including both residential space and retail units) and relationships to the bounding streets.

While the Mobility and Transit Integration Strategy (Attachment 4) provides some rationale for the extra ROW, we do not feel the "45 metres and over" classification that is being proposed appropriately accounts for site-specific conditions across the secondary plan area. Furthermore, we feel it is inappropriate for an Official Plan map to include the uncertainty associated with "45 metres and over" with no limit or definition as to how much land could be taken.

It is our opinion that the Proposal for the Site better responds to the site-specific conditions to create an appropriate boulevard which includes a consistent row of trees along all frontages with adequate soil volumes to support mature canopy growth, generous sidewalks, and cycling facilities. Where the boulevard is narrower along the Finch Avenue West frontage, setbacks have been provided to appropriately supplement the right-of-way while maintaining feasible development parcels and supporting retail viability at-grade. This is a more appropriate response than widening the street to what will become the widest possible designation for a major street, which not only has land implications for adjacent landowners but is also not conducive to supporting a successful retail street, as desired by the Secondary Plan's recognition of Finch Avenue West as a "Retail Required" street.

Given the applications for the Site were submitted months prior to the release of the first Draft Secondary Plan and deemed complete prior to the release of the revised draft and Council consideration of the Secondary Plan, we maintain that these applications are not subject to these policies. Nevertheless, we are interested in supporting the evolution and growth of the Jane and Finch area in a positive way that aligns with the City's proposed Secondary Plan. To do so, we request that City Staff consider a site-specific policy for the Site to allow for a flexible application of the City's objectives for the Finch Avenue West right-of-way (ROW) that appropriately accounts for existing conditions.

More specifically, the current Finch Avenue ROW is over 48m at the Jane and Finch intersection, including a boulevard of approximately 18m along the Site's frontage in this location. While this condition changes as you move east along the street to a 36.6m ROW at the narrowest segment, there is sufficient existing boulevard space along a significant portion of the Site's frontage to achieve the City's objectives for landscaping, cycling facilities, and a generous pedestrian sidewalk. Where this boulevard falls below 8.5m, a widening of 1.5m could be considered to allow for improved pedestrian and cycling facilities in these narrower locations. This would result in a minimum boulevard condition of 6.9m along the Site's frontage (with much of the boulevard exceeding 7m), and minimal impacts to the Proposal.

In this way, the proposed site-specific policy would recognize the asymmetrical nature of the Finch ROW along the frontage of the Site and more appropriately secure a reasonable widening in locations where it is most warranted.

City Staff's Proposed Amendment

The Official Plan of the City of Toronto is amended as follows:

2. Map 3, Right-of-Way Widths Associated with Existing Major Streets, is amended by:
 - 2.3 designating the planned right-of-way of Finch Avenue West, for the length of the Secondary Plan Area, as shown on Map 50-1 on the attached Schedule 4, to 45 metres and over.

Proposed Site-Specific Policy Addition

SASP #1 Jane Finch Mall

1. Along the frontage of 1911 Finch Avenue West, the Finch Avenue ROW varies from an existing condition of over 48m with a boulevard of approximately 18m, to 36.6m with a boulevard of 5.4m. Where the boulevard is less than 8.5m, a widening of up to 1.5m maybe appropriate to support improved cycling and pedestrian facilities.

We appreciate your consideration and response to this issue. Please do not hesitate to contact Emily Reisman (416.340.9004 ext. 291 or ereisman@urbanstrategies.com) or Craig Lametti (416.340.9004 ext. 245 or clametti@urbanstrategies.com) directly should you have any questions regarding this application.

Yours very truly,

URBAN STRATEGIES INC.



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Partner



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