



PLANNING AND URBAN DESIGN

23 February 2024

City of Toronto
Etobicoke York Community Council
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto ON M5H 2N2

Attention: **Nancy Martins, Administrator**

Dear Community Council Members,

**RE: EY11.1 - Jane Finch Secondary Plan and Urban Design Guidelines -
Final Report
2970 Jane Street Site-Specific Comment Submission
1597181 Ontario Inc.
WND File No.: 22.556**

WND Associates has been retained by 1597181 Ontario Inc. (the “Owner”) as the planning consultant for the lands municipally known as 2970 Jane Street in the City of Toronto (the “Subject Site”). This letter is provided with respect to the City-initiated Official Plan Amendment for the Jane Finch Secondary Plan (the “Proposed Secondary Plan”) and Jane Finch Urban Design Guidelines, and further to the recommendations of Item EY11.1 contained within the staff report, dated 7 February 2024, being considered by Etobicoke York Community Council on 26 February 2024.

On 21 December 2022, a Pre-Application Consultation (“PAC”) Meeting was held with City staff regarding the proposed redevelopment of portions of the Subject Site for new residential development. WND Associates had further follow up meetings on 20 April 2023, 4 May 2023, and 7 June 2023 with City Planning staff with respect to the proposed redevelopment of the Subject Site, and to provide comments with respect to the the Jane Finch Secondary Plan development process.

In our opinion, we are generally supportive of the policy direction of the Proposed Secondary Plan to redevelop the neighbourhood, including the Subject Site, as a transit-supportive complete community. However, as further outlined below, we have concerns with respect to policies regarding retail requirements, recognition of existing conditions, public realm elements, and built form requirements for tower floorplates, separation distances and base building heights.

Subject Site

The Subject Site is located at the northwest corner of Jane Street and Firgrove Crescent, just south of Finch Avenue West, in the former City of North York. The Subject Site is in close proximity (approximately 150-250 metres) to the future Jane and Finch stop on the Finch West LRT line, which will provide higher order transit service and link to TTC Subway Line 1 at Finch West Station. The Subject Site is also in close proximity to existing bus routes on Jane Street, Finch Avenue West and local streets.

The Subject Site is irregular in shape and approximately 1.07 hectares in area, with approximately 116 metres of frontage on Jane Street and a maximum depth of approximately 143 metres at its widest point from Jane Street to the rear yards of existing dwellings on Elana Drive to the west. The Subject Site currently comprises a 14-storey rental apartment building, with a front yard drop off driveway, rear surface parking, underground parking and rear landscaped area. The current use of the Subject Site represents underutilization of the lands and infrastructure in proximity to planned higher order transit.

The adjacent property to the north comprises a 1- to 2-storey commercial plaza building and service station, with Yorkgate Mall north of Finch Avenue West and up to 33-storey apartment buildings at Jane and Finch. To the east across Jane Street is Jane Finch Mall, and a 15-storey apartment building at Jane Street and Yewtree Boulevard. South of the Subject Site is a 1-storey commercial plaza building and 13-storey apartment buildings. Lands to the south are Council-approved for redevelopment of apartment buildings up to 25 storeys as part of the Firgrove-Grassways Master Plan. To the west of the Subject Site are 2-storey semi-detached houses on Elana Drive and St. Francis De Sales School.

The Subject Site is located within the evolving Jane and Finch neighbourhood and along the Finch West LRT line which is nearing completion. The neighbourhood, including lands to the south in Firgrove-Grassways and the large commercial plaza parcels at the intersection of Jane Street and Finch Avenue West, will continue to see development activity in line with Provincial policy direction to optimize investment in public transit, as demonstrated by the policies of the Proposed Secondary Plan

Analysis of Proposed Secondary Plan

The following sections of this letter provide our review and analysis of the Proposed Secondary Plan.

Land Use Designation (Map 13)

The Subject Site is currently designated *Apartment Neighbourhoods* on Map 13: Land Use Plan and is proposed to be redesignated to *Mixed Use Areas*. The neighbouring properties within the block (in the southwest quadrant of Jane Street and Finch Avenue West) on the east side of Elana Drive are proposed to be redesignated from *Neighbourhoods* to *Mixed Use Areas*.

We are supportive of this redesignation, as the *Mixed Use Areas* designation better reflects the proximity of the Subject Site, and the other properties in the quadrant, to the Jane and Finch LRT stop and the node of development in the community. The redesignation will also provide greater flexibility for the redevelopment of the Subject Site for appropriate intensification in the existing and planned context.

Area Structure

Under Map 50-2 and Policy 4.1.a) of the Proposed Secondary Plan, the Subject Site is located within the Intersection District. This District is proposed to develop as the heart of the community, with a focus on new housing, retail and services within an updated public realm network. The District is also proposed to include a range of heights, densities and building typologies that will accommodate most of the new growth in the Secondary Plan Area.

We are supportive of the general direction of the area structure policies of the Proposed Secondary Plan, to focus and accommodate new growth within the quadrant that includes the Subject Site.

Land Use Policies (Retail)

Map 50-5 of the Proposed Secondary Plan identifies a New Street within the quadrant as a Priority Retail Street and Jane Street as a Retail Required street. Proposed Policy 5.2.2. requires ground floor frontages of development to include only retail and service uses, with some limited exceptions. Proposed Policies 5.2.3. and 5.2.4. further provide restrictions and requirements for building entrances, ground floor heights and unit frontages.

In our opinion, the proposed land use policies with respect to retail are inflexible and onerous, and we have the following concerns:

- The existing rental residential building on the Subject Site is located approximately 21 metres from the Jane Street lot line and the ground floor contains residential rental units. The existing conditions of buildings should be recognized in the Proposed Secondary Plan, and permitted to continue indefinitely in conformity with the Secondary Plan.
- There is no language which allows for refinements to the design of the ground floor of development without requiring an amendment to the Secondary Plan. This is provided in other sections of the Proposed Secondary Plan, and in our opinion, it would be appropriate in this section to provide for appropriate flexibility on a site-specific basis.

Public Realm

Map 50-3 of the Proposed Secondary Plan identifies a New Street, Priority Parkland Area (Conceptual Location) and Green Pedestrian Connection in proximity to the Subject Site. Proposed Policy 6.1.2. states that the precise size, location and configuration of new public realm elements will be identified and secured through development application review processes, and that refinements will not require an amendment to the Secondary Plan. We are generally supportive of this policy approach.

The policies with respect to Green Pedestrian Connections in Section 6.6. note that these public realm elements should be incorporated in development and provide location and design criteria regarding sight lines, obstructions and width. We are concerned that the Green Pedestrian Connection requirements, in addition to requirements for new streets (Mixed Use Shared Streets, see below), are onerous and may restrict the developable area of the Subject Site. The Proposed Secondary Plan should confirm that the consolidation of pedestrian connections within new street rights-of-way is encouraged.

Mobility

Map 50-4 of the Proposed Secondary Plan identifies a New Street in proximity to the Subject Site, as well as Intersection Improvements at its intersection with Jane Street. Proposed Policy 7.2.3. states that refinements to the mobility network will not require an amendment to the Secondary Plan. We are generally supportive of this policy approach.

Proposed Policy 7.2.6. states that new streets will have planned right-of-way widths of generally 18.5 metres and Proposed Policy 7.2.7. states that new streets in the Intersection District will be designed as

Mixed Use Shared Streets. Mixed Use Shared Streets are noted as streets which have space shared between different modes/users, with pedestrians having the highest priority and a delineated pedestrian clearway zone. We are generally supportive of the right-of-way requirement. However, as noted above we are concerned that new street requirements, in conjunction with Green Pedestrian Connection requirements, are redundant, many create inappropriately-sized public realm elements and may limit the developable area of the Subject Site.

Built Form and Development

Map 50-6 of the Proposed Secondary Plan identifies a Height Peak at Jane Street and Finch Avenue West, with a General Height Limit of 45 storeys in the southwest quadrant which includes the Subject Site, with Direction to Transition Down to the south and west. Proposed Policy 8.1.3. identifies the Intersection District as accommodating the greatest height and densities, to be progressively transitioned down in Proposed Policy 8.1.4. We are generally supportive of this policy approach.

Proposed Policy 8.1.7. identifies a maximum tower floorplate of generally no greater than 750 square metres and separation distances of generally 25-30 metres depending on building height. We have the following concerns with these policies:

- In line with other recent Secondary Plans, policies should provide flexibility for floorplate areas to exceed 750 square metres without an amendment to the plan when other urban design considerations are satisfied. Moreover, there are many examples of floorplates which exceed 750 square metres within the Secondary Plan area, including the existing building on the Subject Site which has a floorplate of approximately 1,215 square metres.
- The proposed policy for 30-metre tower separation distances is inconsistent with:
 - i) the policy intent of the Secondary Plan to intensify underutilized sites with new compact development forms;
 - ii) the Tall Building Design Guidelines which generally recommend tower setbacks of 12.5 metres for 25 metres of tower separation; and
 - iii) many recent development approvals in *Mixed Use Areas* and *Apartment Neighborhoods* across the City which have established tower setbacks less than what is being proposed by the Secondary Plan.

Proposed Policies 8.4.1.i), j) and k) with respect to development in the Intersection District include that: development will consist of tall buildings and mid-rise buildings; tall buildings in the southwest quadrant will transition down in height and scale toward the southwest to Elana Drive; and, base buildings will generally not exceed 6-8 storeys in height with stepbacks, depending on location.

We are generally supportive of these built form policies; however, we note that there should be greater flexibility in base building heights for sites on Priority Retail Streets, not less, given the more onerous design requirements for providing non-residential uses on the ground floor.

Conclusion

We are supportive of the redesignation of the Subject Site to *Mixed Use Areas*, and a number of policies in the Proposed Secondary Plan which provide a comprehensive planning framework for the redevelopment of the area.

As noted above, we have concerns regarding the impact of policies on the implementation of the redevelopment of the Subject Site, including onerous requirements for retail development, pedestrian connections, tower floorplates and separation distances, among other matters. We suggest more flexible language that recognizes existing conditions and provides for refinements and site-specific design solutions without amendment to the Secondary Plan. We would be pleased to meet with City staff to discuss our comments and to achieve an appropriate planning policy outcome for the Subject Site.

We trust that the information included within this comment letter is complete and comprehensive, and sufficient to allow for further review of the Proposed Secondary Plan prior to advancing to City Council. Should you have any questions, please do not hesitate to contact the undersigned. We request that the undersigned of our office be circulated on any Notice(s) of Decision with respect to this matter.

Yours very truly,

WND associates
planning + urban design



Tyler Peck, MCIP, RPP
Senior Associate