

21 January 2025

Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON | M5H 2N2

Attention: Chair and Committee Members

RE: Agenda Item PH18.5 – Housing Action Plan: Avenues
Policy Review - Decision Report
WND File No. 24.577

Introduction & The Subject Site

We are the planning consultants for iProCapital Ltd., the owners of the lands municipally addressed as 1027-1101 Finch Avenue West (the “Subject Site”). The Subject Site is located at the southeast corner of Finch Avenue West and Champagne Drive and is occupied by a 1-storey building containing a mix of commercial and retail uses (Figure 1). The Subject Site is conveniently connected to and located in proximity to an expanding network of higher-order and frequent transit services (Figure 2).



Figure 1: Oblique aerial overview of the Subject Site and surroundings looking southwest.

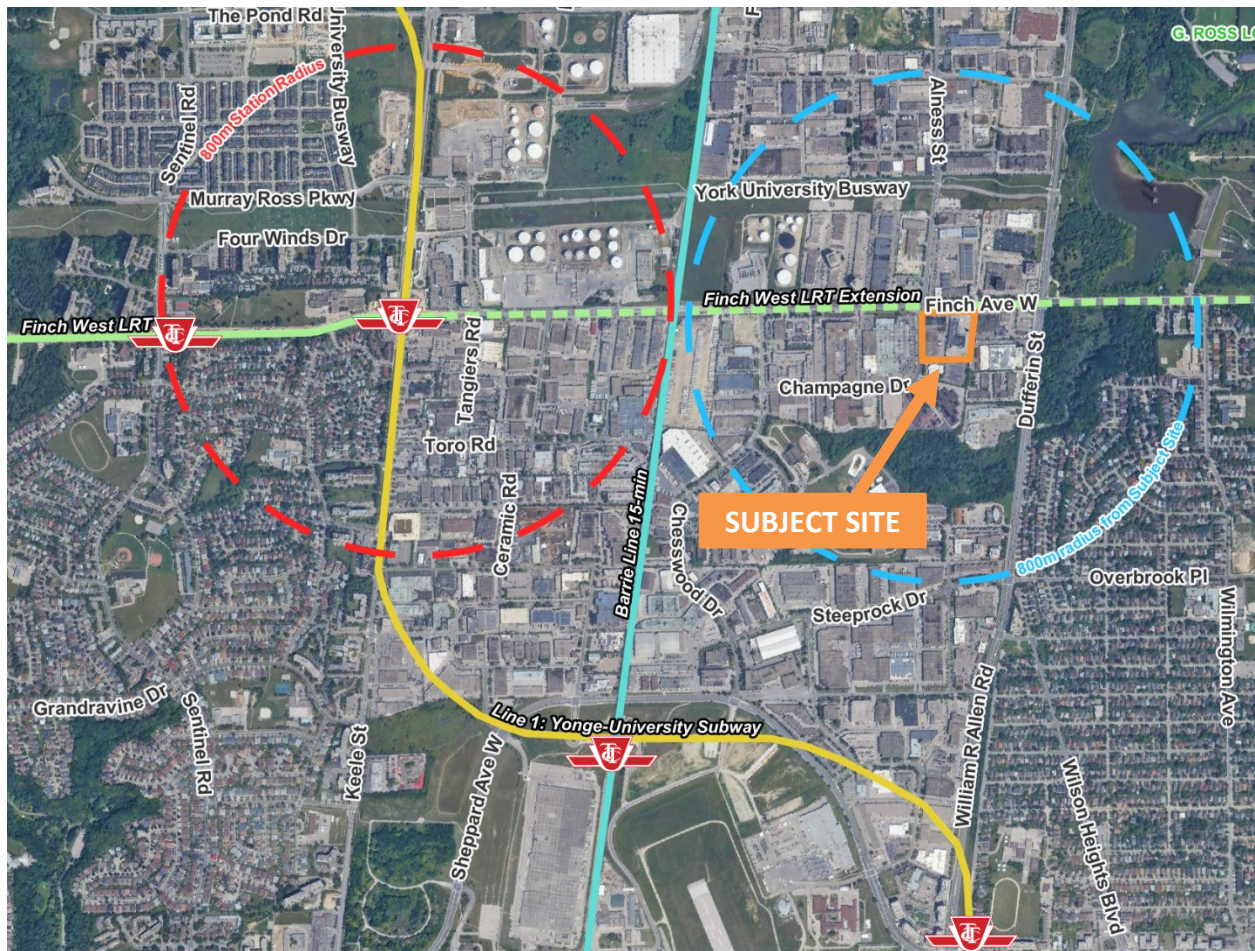


Figure 2: Map of the Subject Site and existing and planned higher-order transit routes & stations (represented by the TTC logo).

Comments

On January 23, 2025, Planning and Housing Committee will consider “Agenda Item PH18.5 – Housing Action Plan: Avenues Policy Review - Decision Report” which recommends that City Council adopt Official Plan Amendment 778 to amend the Official Plan policies under Chapter 2 with respect to the *Avenues* growth areas and to amend Map 2 of the Official Plan to expand and revise the *Avenues* overlay. The Subject Site is not included within the proposed expansion of the *Avenues* overlay (Figure 3).

The City’s efforts to expand the *Avenues* overlay are laudable in that they seek to facilitate additional growth opportunities to support new housing and employment within the City. That being said, we believe that a more nuanced and detailed review of employment lands along major streets where *Avenues* should be logically extended would be beneficial to producing a more comprehensive policy framework for growth and development. In our opinion this would include extending the *Avenues* overlay over the Subject Site and ideally along the entirety of Finch Avenue West between Dufferin Street and Keele Street.

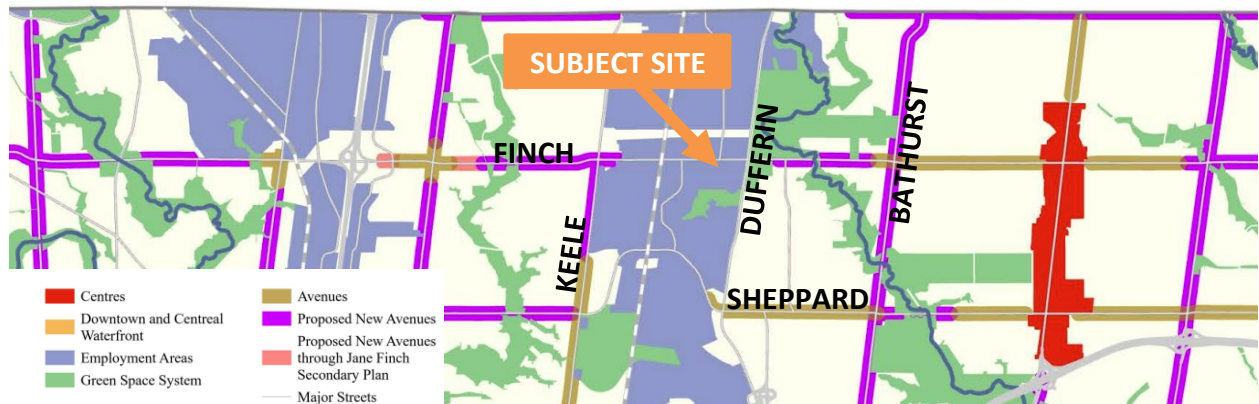


Figure 3: Subject Site located in context with the expansion of *Avenues* on Official Plan Map 2.

The staff report dated January 2, 2025 notes that staff considered the following in their assessment of the expanded *Avenues* overlay:

1. *Current and planned frequent and higher-order transit;*
2. *Proximity to Employment Areas;*
3. *Proximity to major post-secondary institutions; and,*
4. *Opportunities to connect existing Avenues.*

The following sections of this letter address these considerations as they relate to the Subject Site and the potential to extend the *Avenues* overlay to it and the surrounding lands along this portion of Finch Avenue West.

1. Current and Planned Frequent and Higher-order Transit

The staff report notes that the *Avenues* overlay is proposed to align with the “*Current and Planned Frequent and Higher-Order Transit*” as identified on Map 4: Higher Order Transit Corridors and on Map 5: Enhanced Surface Transit Network street. The Subject Site is located along a portion of Finch Avenue West which is identified on Map 4 as “Transit Corridor,” consistent with the Province’s 2041 Regional Transportation Plan that includes the ‘Finch West LRT Extension’. The Subject Site is also located along a portion of Finch Avenue West which is identified on Map 5 as a “Transit Priority Segment” and there are currently a mix of frequent and express transit services connecting the Subject Site to local destinations and other higher order transit corridors. In our opinion, the transit characteristics of Subject Site and this segment of Finch Avenue West would be supportive of including it within the expanded *Avenues* overlay, and would further align OPA 778 with the policy framework objectives of aligning growth with sustainable transportation and reducing automobile dependency.

2. Proximity to Employment Areas

Whereas the in-force Map 2 includes *Avenues* abutting *Employment Areas* and the previous June 2024 draft update to Map 2 (June 2024) included several proposed expansions of *Avenues* abutting *Employment*

Areas, the now proposed mapping of OPA 778 has removed these *Avenues* overlays near *Employment Areas* with the following rationale provided in the staff report:

“While Avenues do not overlap with Employment Areas on Map 2, identifying Avenues adjacent to Employment Areas has the potential to cause land use compatibility issues and adverse affects on both the businesses in Employment Areas and adjacent sensitive land uses (i.e. residential). The identification of Avenues adjacent to Employment Areas has been avoided, except in limited circumstances where there is existing or planned light rail transit or subway stations.”

While land use compatibility between *Employment Areas* and sensitive uses is an important part of good planning, the proposed amendments to Map 2 ignore the existing sensitive use permissions for the Subject Site and several other *Employment Areas*-designated lands along this portion of *Finch Avenue West*. For the Subject Site and the adjacent properties which front onto Finch Avenue West, the in-force *Industrial-Commercial (MC)* zoning under Former City of North York Zoning By-law 7625 already allows for as-of-right sensitive uses like ‘secondary schools’ and ‘day nurseries.’

Furthermore, the existing established uses and zoning permissions for the Subject Site and adjacent lands along Finch Avenue West include commercial, office, retail and recreational uses, which are not in keeping with the Planning Act and Provincial Planning Statement, 2024’s (PPS) revised “*area of employment*” definition that seeks to refocus land use within *employment areas* to “primary” employment uses including manufacturing, research and development, warehousing and retail/office/ancillary uses associated with these primary uses. In essence, lands fronting Finch Avenue West provide for a gradient of ‘non-employment uses’ between Finch Avenue West and the more focused ‘industrial-type’ uses within the interior of the *Employment Areas*, which more closely align with the Planning Act and PPS vision for “*areas of employment*.”

To support the operational stability for employment uses and the long-term economic growth of the City, both the PPS and Official Plan already include land use compatibility policies which require ‘sensitive uses’ – such as those already permitted on the Subject Site and envisioned along *Avenues* – to demonstrate compatibility with *Employment Areas*. In our opinion, an extension of the *Avenues* overlay over the Subject Site and the abutting lands along Finch Avenue West would not by default introduce land use compatibility impacts to the stable operating environment of the surrounding *Employment Areas* and the existing provincial and municipal land use compatibility policies would appropriately control the location of these sensitive uses so as to achieve this compatibility.

Furthermore, we note that OPA 778’s proposed changes to Map 2 include several newly expanded *Avenues* overlays which abut *Employment Areas*, both where there is “*existing or planned light rail transit or subway stations*”, such as Finch Avenue West between Lindy Lou Park and Duncanwoods Park, and where there is not, such as the lands along Weston Road located outside of the Council-adopted Major Transit Station Areas abutting major manufacturing uses (like the Irving Paper Factory). From this, it appears that City staff recognize that land use compatibility between abutting *Avenues* and *Employment Areas* is not insurmountable and can be wholistically addressed through the development application

review process. In our opinion, a similar approach to addressing compatibility, infrastructure, servicing and other matters through the application review process for the Subject Site and other potential *Avenues* lands along this portion of Finch Avenue West would be appropriate and consistent with the approach being taken on other sites within the proposed expansion of the *Avenues* overlay.

3. Proximity to major post-secondary institutions

The Subject Site is located in proximity to York University, which is accessible from the Subject Site via frequent and convenient connections to Finch West Station and the Line 1 Subway. The York University busway also provides a higher order transit service to York University and is accessible from the bus stop at Finch Avenue West and Dufferin Street (approximately 250 metres from the Subject Site). York University is a major employer and generator of local housing demand and, in our opinion, the Subject Site's connectivity and proximity to York University supports its inclusion within an expanded *Avenues* overlay along Finch Avenue West, through which its future redevelopment could contribute to accommodating the housing demands of the university (subject to an appropriately detailed land use compatibility assessment).

4. Opportunities to Connect Existing Avenues

Under OPA 778, almost the entirety of Finch Avenue West is proposed to be designated as *Avenues*, with the lands between Dufferin Street and Keele Street being one of the notable exceptions. An extension of the *Avenues* over the Subject Site and adjacent properties along Finch Ave West would assist with 'bridging the gap' and connecting these *Avenues*.

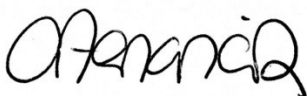
Conclusion

In our opinion, while the current draft of OPA 778 represents a significant step to expanding the *Avenues* throughout the City to facilitate new growth, further refinements to the proposed policies and mapping would provide for a more comprehensive and more consistent framework, which in our opinion, should include the recognition of the Subject Site and the adjacent lands fronting Finch Avenue West between Dufferin Street and Keele Street as expanded *Avenues*.

Should Committee Members or City staff have any questions, require further information or wish to discuss this further, please do not hesitate to contact the undersigned or bleal@wndplan.com.

Yours very truly,

WND associates
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