



Project No. 14136-2 (

June 18, 2020

Scarborough Community Council Members
Scarborough Civic Centre
3rd floor, 150 Borough Dr.
Toronto, ON M1P 4N7

Members of Scarborough Community Council:

Re: \$ Item SC15.1, June 19, 2020
Golden Mile Secondary Plan Study - Status Report
Starlight Development

We are the planning consultants for Starlight Developments on behalf of D.D. Acquisitions Partnership (“Starlight”) with respect to the above-noted matter, and with respect to their lands at 9, 15, 19, 23, 32, and 40 Craigton Drive, 1 Rannock Street and 860 Pharmacy Avenue (the “subject site”). The subject site within the Golden Mile Secondary Plan area.

The subject site is currently occupied by eight 3½ storey apartment buildings surrounded by landscaping and accessory surface parking lots. The eight apartment buildings include a total of 248 purpose-built rental apartment units.

On behalf of Starlight, we submitted an Official Plan Amendment application on November 19, 2019 to permit approximately 1,718 purpose-built rental units to Toronto’s rental housing stock in three new buildings, which is supportive of both municipal and provincial housing policies. Of those units, 248 will be rental replacement units in place of the existing 248 rental units. The proposed redevelopment would activate the existing and improved public realm with active at-grade uses including residential lobbies, amenity spaces and the introduction of limited retail uses. The buildings will be well-separated from each other, with quality mid-block connections and privately-owned public spaces to improve pedestrian connectivity.

We had previously reviewed the draft Secondary Plan policies considered by Scarborough Community Council at its January 8, 2020 meeting and outlined in a Proposals Report dated December 20, 2019, and had a number of concerns. We outlined those concerns for staff in a letter dated February 20, 2020 (see **Attachment A** at the end of this letter).



We have now had the chance to review the Golden Mile Secondary Plan Study - Status Report and the accompanying draft Golden Mile Secondary Plan, and note that the concerns we previously outlined for staff have not been addressed. Generally speaking, those concerns are related to, among other things, the proposed density and height; the proposed secondary plan's alignment with provincial policy directions promoting intensification around transit; requirements for various publicly-owned parks and public roadways; minimum unit size requirements; as well as several built form performance standards which would be inappropriate within a policy document.

We are writing to request that staff consult further with Starlight in advance of the statutory public meeting on July 17, 2020, so that we can further discuss these concerns with staff. We also request to be notified of any decision of Council with respect to this matter, including any adoption of the Secondary Plan.

Thank-you for your consideration of these comments. If you require any clarification or wish to discuss these matters further, please do not hesitate to contact me.

Yours very truly,

Bousfields Inc.

A handwritten signature in black ink, appearing to read 'Mike Dror', written in a cursive style.

Mike Dror, MCIP, RPP

cc: # *Kim Kovar, Aird & Berlis*
Joshua Kaufman and Anne Messori, Starlight Developments



Attachment A: Bousfields February 20, 2020 Letter to Staff #

February 20, 2020

Emily Caldwell, MPL, MCIP RPP
(Acting) Senior Planner
Community Planning, City Planning Division
Scarborough Civic Centre
150 Borough Drive, 4th Floor
Toronto, ON, M1P 4N6

Dear Ms. Caldwell:

Re: \$ *Draft Golden Mile Secondary Plan Draft*
9, 15, 19, 23, 32 & 40 Craigton Dr, 1 Rannock St, & 860 Pharmacy Ave

As you are aware, we are the planning consultants to Starlight Developments on behalf of D.D. Acquisitions Partnership ("Starlight") with respect to the above-noted matter. Our client's site is municipally known as 9, 15, 19, 23, 32 and 40 Craigton Drive, 1 Rannock Street and 860 Pharmacy Avenue (collectively, the "subject site"), and is located between Pharmacy Avenue and Victoria Park Avenue, approximately 175 metres north of Eglinton Avenue West.

The subject site is located within the study area of to the proposed Golden Mile Secondary Plan within a short walking distance of three proposed Crosstown LRT stations (O'Connor, Pharmacy and Hakimi). The subject site is designated *Apartment Neighbourhoods* in the City of Toronto Official Plan, and the properties at 9, 15, 19 and 23 Craigton Drive are subject to Site and Area Specific Policy (SASP) 109, which includes development policies for the redevelopment of those properties and the site to the south. The site is zoned *Apartment Residential (A)* in the Clairlea Community Zoning By-law No. 8978, and *Residential Apartment (RA)* (au99.0) (x474) in the City-Wide Zoning By-law 569-2013. Currently, the eight properties that make up the subject site are each occupied by a 3.5 storey apartment building.

On November 19, 2019, on behalf of Starlight, we filed an application for an Official Plan Amendment with respect to the subject site. The purpose of the requested Official Plan Amendment is to introduce new site specific policy directions to permit the proposed reconfiguration and redevelopment of the subject site with three new buildings ranging in height from 15 to 34 storeys, a new public road and a new open space, and to allow for the future realignment of Craigton Drive with Ashtonbee Road, as discussed in more detail in our November 2019 Planning & Urban Design Rationale report.

Since the submission, Scarborough Community Council considered the Golden Mile Secondary Plan – Proposals Report, dated December 20, 2019, at its meeting of January 8, 2020 and recommended that City Council request that staff invite comment and undertake stakeholder consultations on the draft Secondary Plan appended to that report as Attachment 3. We have now had the opportunity to review the draft Secondary Plan, and have a number of broad and specific concerns, which are described below.

1. "The draft Secondary Plan (e.g. on Map 4 and others) identifies a new park on a portion of the subject site (West Park), that appears to constitute an area greater than 5 percent of the subject site. Upon proclamation of the relevant provisions, Bill 108 will repeal the alternative parkland conveyance and rate provisions that would allow the City of Toronto to require a parkland dedication greater than 5 percent of the subject site's area, and will prohibit the passing of a parkland by-law under Section 42(1) once a community benefit charge by-law is in effect. It appears that the draft Secondary Plan has not been updated to reflect the imminent *Planning Act* amendments, and in our opinion it would be appropriate to recognize and reflect the pending amendments as part of this process.
2. "The planned street network (as identified on Map 7) identifies two New Conceptual Streets on the subject site, along the south and west boundary of 9, 15, 19 and 23 Craigton Drive. According to Policy 11.6(a) conceptual streets may be required to be public streets, and according to Policy 11.7(a), will be required to be generously-scaled. Although it is unclear from the draft Secondary Plan, the relevant policies imply that these streets are expected to accommodate vehicles. In our opinion, these locations would be appropriate locations for a combination of mid-block connections and/or driveways, but it is unclear whether new public streets would be required at these locations. We recommend that these "New Conceptual Streets" be replaced with "Proposed Mid-block Connections", which may or may not accommodate cars, depending on the conclusions of a traffic impact study accompanying a development application.
3. "In our opinion, density is not the appropriate urban design tool for achieving transition, which should be evaluated on a case-by-case basis as discussed in Section 5.4 of our Planning & Urban Design Rationale report. Nevertheless, if the proposed maximum densities are maintained in the proposed secondary plan, we offer the following comments.

It is our opinion that the proposed Secondary Plan in its current form would not be consistent with the 2014 Provincial Policy Statement ("PPS") and

would not conform with the 2019 Growth Plan or the City of Toronto Official Plan, both of which contain a number of policies that seek to optimize the use of land and infrastructure and to promote intensification and compact built form, particularly in areas well served by higher order public transit. In our opinion, the proposed Golden Mile Secondary Plan contains prescriptive limitations on density, in particular, which are contrary to those policy directions.

More specifically, it is our opinion that the proposed gross density of 2.5 FSI assigned to the subject site by Map 5 and referenced in Policy 4.12 does not optimize the use of land and infrastructure. As set out in our Planning & Urban Design Rationale, it is important and appropriate from a planning policy perspective to optimize density on the subject site given its location within three major transit station areas, and, accordingly, within a strategic growth area as defined in the Growth Plan for the Greater Golden Horseshoe.

In this regard, the Eglinton Crosstown LRT is identified as a “Priority Transit Corridor” on Schedule 5 of the Growth Plan with a minimum density target of 160 residents and jobs combined per hectare. The proposed development by Starlight would result in a gross density of 4.24 FSI, which will achieve an overall density of approximately 1,532 residents and jobs per hectare. In our opinion, the proposed density in the Official Plan Amendment application (a gross FSI of 4.24 and a net FSI of 4.65) is appropriate and desirable and conforms with the policy direction set out in the Growth Plan. In this regard, we note that the word “optimize” means “to make as perfect, effective, or functional as possible”. Given that the density targets in the Growth Plan are minimum targets and not maximums, the proposed Secondary Plan should seek to optimize the number of units and jobs around transit, not limit it, subject to a review of the capacity of physical infrastructure, as provided for in Policy 4.13(a).

Further, we note that the subject site is different from many sites in the Secondary Plan area in that its gross density will be very similar to its net density. Given that the proposed north-south public road through the subject site, to be conveyed to the City, is more or less offset by the existing alignment of the south portion of Craigton Drive, to be assumed by Starlight, the overall site area will not significantly change as a result of public realm improvements. This is in contrast to other sites in the plan, which are proposed to include new roads, but not assume existing ones. As such, it is anticipated that their site areas will be effectively reduced, meaning that their resulting net densities will likely be significantly higher than the densities shown on Map 5. Should Map 5 and Policy 4.12 be maintained as proposed

in the draft Secondary Plan, we would request that the proposed gross density on the subject site be increased to a more appropriate FSI (i.e. the 4.24 FSI identified in the Official Plan Amendment application), in recognition that the subject site is different from most other sites in the proposed Secondary Plan area.

Nevertheless, we note that, along the north side of Eglinton Avenue East, the proposed gross densities generally range between 3.0 and 3.2 times the areas of those blocks, with those blocks extending north to Ashtonbee Road, which is proposed to be realign with Craigton Drive. However, on the block containing the subject site, the proposed maximum density is 3.2 on the property to the south and then 2.5 on the subject site. This reduction in density appears to have been done to “step down” to the existing low-rise buildings on the north side of Craigton Drive. We note that those properties are subject to a proposed height limit of between 5 and 11 storeys beyond which is a hydro corridor that provides an existing natural transition to the nearest *Neighbourhoods* which are located to the north of this corridor (i.e. the planned Meadoway). The proposed maximum density for the subject site should be at the very least similar to the maximum density proposed to be permitted on the character areas further east which are also identified as ‘Residential Transition Areas’ on Map 3 of the proposed Secondary Plan. These properties are allocated higher densities than the subject site, despite the fact that they are located along Ashtonbee Road, which is proposed to be aligned with Craigton Drive.

In addition, the subject site contains a large number of existing rental apartment units (a total of 248). The OPA application proposes to maintain and replace the existing rental units on site (as per Official Plan Policy 3.2.1(6)), while significantly increasing the amount of purpose-built rental housing in the Golden Mile area, with 1,470 new units, along with limited retail uses. The proposed redevelopment will contribute to the creation of complete communities by promoting a mix of built forms, uses and housing tenures. However, the implications of the rental replacement policies include additional development complexities and costs, such as tenant relocation, tenant assistance and the maintenance of below-market units for a period of time following occupancy. The proposed Secondary Plan, as drafted, would restrict the site’s developability by capping the permitted FSI at a density that is lower than properties to its south and east, without the appropriate consideration for the existing rental units, and the associated rental replacement implications.

As such, we recommend that that the plan be revised to remove Policy 4.12 and Map 5, or assign a more appropriate density limit that is supportive of the proposed development.

4. " Similarly, it is our opinion that the proposed height limits for buildings and base buildings are unnecessarily restrictive and appear to conflict with the policies of the PPS, Growth Plan and Official Plan directing that land use be optimized around transit. Generally speaking, while there is a recognition of potential for redevelopment in the Secondary Plan area, the plan is overly prescriptive in terms of its built form policies. Matters related to building height (e.g. Policy 7.31(a)), podium height (e.g. Policy 7.25 which refers to Map 12), stepbacks (e.g. Policy 7.43(c)), floor plate (e.g. Policy 7.43(d)), building separation (e.g. Policy 7.43(e) and Policy 7.44(d)), among other matters, are already sufficiently addressed by the City's Tall Building Guidelines and Mid-rise Building Design Guidelines. It is our opinion that such detailed numerical standards are inappropriate and undesirable in a policy document. If this and similar policies are to be included, the relaxation of density limits becomes even more important in terms of achieving transit-supportive intensification on the subject site.
5. " Proposed Policy 7.39 provides that development along the reconfigured Craigton Drive will have a predominantly mid-rise/low-rise character to provide appropriate transition to the Meadowway, the Craigton Tot Lot, and the proposed West Park, and will provide mid-rise and/or low-rise buildings along both sides of the street. In our opinion, it would be inappropriate to locate buildings with a low-rise character along the reconfigured Craigton Drive, given the numerous policy directions of the PPS, Growth Plan and Official Plan supporting transit-supportive intensification at such a transit-oriented location. Further, given that the Official Plan focuses on impacts on *Neighbourhoods*, given that the nearest *Neighbourhoods* are located north of the Meadowway, given that the Meadowway is not planned as a traditional park but as a multi-use trail, and given that the Craigton Tot Lot is located across the street from the subject site, it is unnecessary to restrict the built form typology, subject to adequately limiting built form impacts.
6. " Policy 9.2 would require, for developments containing more than 80 residential units, 25% of the units to have at least two bedrooms and 10% to have at least three bedrooms. In our opinion, advancing these prescriptive measures without an in-depth review of market demand/supply and income/affordability results in potential risks with respect to housing affordability and could potentially stifle the development of new housing in the Golden Mile area.

7. "Finally, Policy 10.5, among others, would provide that development may be requested to contribute to the delivery of community service facilities in a number of ways. However, it is unclear through what mechanism these contributions would be provided and under what conditions.

If you require any clarification or wish to discuss these matters further, please do not hesitate to contact me, or Mike Dror, Associate, of our office.

Yours very truly,

Bousfields Inc.



Tom Kasprzak, MCIP, RPP

*cc: Anne Messore and Joshua Kaufman, Starlight Developments
Kim Kovar, Aird & Berlis*