



May 24, 2024

SENT VIA EMAIL TO iec@toronto.ca

Infrastructure and Environment Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair McKelvie and Members of the Committee,

**Re: Item IE14.6 - ReNew Golden Mile
Reconfigured and New Major Streets EA
Draft Recommended Alignment Comments**

Thank you for the opportunity to provide feedback on the Draft Recommended Alignment presentation and report regarding the ReNew Golden Mile Reconfigured and New Major Streets Environmental Assessment ("Golden Mile EA").

As you may be aware, Starlight Developments is the agent on behalf of D.D. Acquisitions Partnership ("Starlight"), the owner of the lands municipally known as 9, 15, 19, 23, 32 and 40 Craigton Drive, 1 Rannock Street and 860 Pharmacy Avenue in the City of Toronto (the "Subject Site").

The Subject Site were subject to an Official Plan Amendment ("OPA") application which introduced Site and Area Specific Policy 820 (the "SASP") through OPA 638. OPA 638 was endorsed by Toronto City Council on May 11, 2022 and approved via oral decision by the Ontario Land Tribunal ("OLT") at a settlement hearing held on December 6, 2022, followed by a written decision on June 1, 2023. As such, OPA 638 and SASP 820 are now in force.

At present, Starlight has an active rezoning application under review by the City and is preparing a second submission in response to City comments. The vision for the redevelopment of this site is a comprehensive plan for a 100% purpose built rental project for a total of 1,556 units including 248 rental replacement units within high and mid rise buildings, located to support the City's (and other levels of government) investment in the Eglinton Crosstown LRT. The project will also provide modern indoor and outdoor amenities for residents, retail amenities, a new public park, and new pedestrian and road connections to improve connectivity. Due to the frontage of our lands on Rannock Street, the conclusion and outcome of this EA is critical to the implementation of our project, on many fronts including the physical alignment of the roadway relative to our development plans, the provision of infrastructure and the timing of the process to allow for the rezoning process to conclude.

Starlight previously provided comments on the progress of the EA on February 16, 2023 in response to a presentation given to landowners within the study area, and on May 1, 2023 in response to a presentation given as part of a virtual public meeting held on April 17, 2023.



Comments on Presentation Materials – Draft Recommended Alignment

With respect to the ongoing plans to realign Craigton Road, Starlight has discussed the EA with City Staff in a virtual meeting held on May 10, 2024 and reviewed the staff report and presentation materials in front of the Infrastructure and Environment Committee on May 28, 2024.

Overall, we are pleased to note our strong support for Alignment 2 which is the City's preferred alignment (see reference diagram included in Appendix B). However, we do have concerns related to the detailed design of this alignment and offer the following comments for the City's consideration:

Craigton Reconfiguration (General Comments)

- Of the two street alignment alternatives for the Craigton Drive reconfiguration, Starlight agrees with the outcomes of Staff's draft evaluation which find that Alignment 2 is preferable to Alignment 1.
- We note staff's commentary regarding technical concerns arising from the adjacency of Toronto Water's facilities on the east side of Pharmacy Avenue related to Alignment 2 and that staff consider those matters resolvable consistent with the preferred advancement of Alignment 2.
- We emphatically reiterate our earlier concerns with respect to Alignment 1, as this option results in a detrimental burden to Starlight's redevelopment plans for the Subject Site. In particular, Alignment 1 will significantly impact the ability to develop at least two of the planned buildings shown on Map #2 (**Appendix A**) of Starlight's council approved OPA/SASP, which is attached. These impacts result in a significant loss in density and units, and an inability to reallocate this loss in density and units elsewhere on the Subject Site. This impact is particularly significant given that Starlight's intends to redevelop the lands for additional purpose-built rental housing and to accommodate the replacement of all 248 rental units that exist today.
- All of the future density approved on the Subject Site, and detailed in the attached SASP, is required to support a feasible rental development plan inclusive of the 248 rental replacement units. Due to the size of the property and physical space available for redevelopment, any modifications to the approved development plans that diminish the approved density will negatively impact the feasibility to redevelop these lands for much-needed new and replacement rental housing.
- We trust the above will be factored into any deliberations regarding the Toronto Water infrastructure matters which will enable final confirmation of the City's preferred direction to adopt Alignment 2 which Starlight supports.

Craigton Reconfiguration (Comments on Widening and Cross-section Details)

- The Draft Recommended Alignment for the reconfigured Craigton Drive shows a 3.0 metre widening along the south side of the street. This design is inconsistent with the plans and approvals previously secured for the redevelopment of the Subject Site as reflected in OPA 638



and SASP 820, which show a 1.5 metre widening along the south side, with the implication that 1.5 metres would be required along the north side of the existing Craigton Drive.

- It is Starlight position that the “equal” widening condition is appropriate, given:
 - Providing equal 1.5 widenings on the north and south sides of Craigton Drive is technically feasible in our opinion, as demonstrated in the attached Conceptual Road Plan, prepared by BA Group and dated May 14, 2024 (see **Appendix B**).
 - There is no impediment to providing an equal size widening on the north side of Craigton Drive, particularly as some of the properties on the north side are already required to contribute land for the Craigton Drive realignments proposed by the EA.
 - While the properties on the north side of Craigton Drive are not subject to active development applications, they are clearly identified as development sites within the GMSP and are anticipated to redevelop over time, providing the opportunity for the City to acquire the lands necessary to facilitate the widening.
 - By providing an equal size widening on both sides of the street, the burden is shared equally by abutting landowners that will benefit from the improved condition on Craigton Drive and the broader connectivity afforded by its realignment (as per Alignment 2) to connect to Ashtonbee Road.
 - It is Starlight’s position that the equal sided widening could be achieved on a phased / staged basis as redevelopment on either side of Craigton Drive proceeds OR through negotiation with the landowners on the north side of the street (that will occur between the City and a number of these landowners in any event given the recommended realignment). Such a phased approach would enable an orderly implementation of the ultimate right-of-way and street cross-section on Craigton Drive that enables the primary mobility related aspects of the cross-section to be delivered in the near term with the additional 1.5 metres of land on the north side of the street being allocated to boulevard / public realm aspects if that land were to be provided at a later time.
 - The lands that front onto the south side of Craigton Drive to the west of the Subject Site that form part of the approved redevelopment of 1880-1890 Eglinton Avenue East and 1523 and 1525-1545 Victoria Park Avenue only provide a 1.5 metre widening of Craigton Drive.

Timing and Implementation of the Craigton Alignment

- The realignment of Craigton Drive and Rannock Street came from a recommendation set out in the Golden Mile Secondary Plan to realign these streets with Ashtonbee Road and improve east-west connectivity throughout the overall Golden Mile area. The realignment and improvements are not necessitated by the Starlight development or as a result of our Transportation Impact Study. Accordingly, we assume that the City will be responsible for the construction and implementation of the new cross section and alignment. In this regard, we would stress that the conclusion of the EA process in a timely manner is imperative to allow for much needed rental housing to be developed. It is our understanding from our meeting with the City on May 10, 2024





that the EA process is to conclude with final approval by December, 2024. We request the opportunity to continue to be apprised of progress.

Next Steps

Considering the importance of this work and its potential implications for the proposed development of the Subject Site, we urge the timely completion of the development of the preferred design. We look forward to working collaboratively with the City to advance the EA in parallel with our upcoming zoning by-law amendment and draft plan of subdivision approval processes for the Starlight Lands. The resolution of the EA is critical to enabling our development plans and infrastructure to proceed.

Moreover, we look forward to engaging at a detailed level on the evaluation criteria to be adopted in the evaluation of these alternative alignments given the implications that the above alignments may have on the Starlight property and development. We further look forward to reviewing detailed street plans and overlay materials that clearly defined any impact of the options being considered by the City to enable a full understanding of any property / development related impacts, given the level of specificity of the approved OPA / SASP with respect to built form and various planning control.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Salima Kheraj".

Salima Kheraj
Vice President, Development

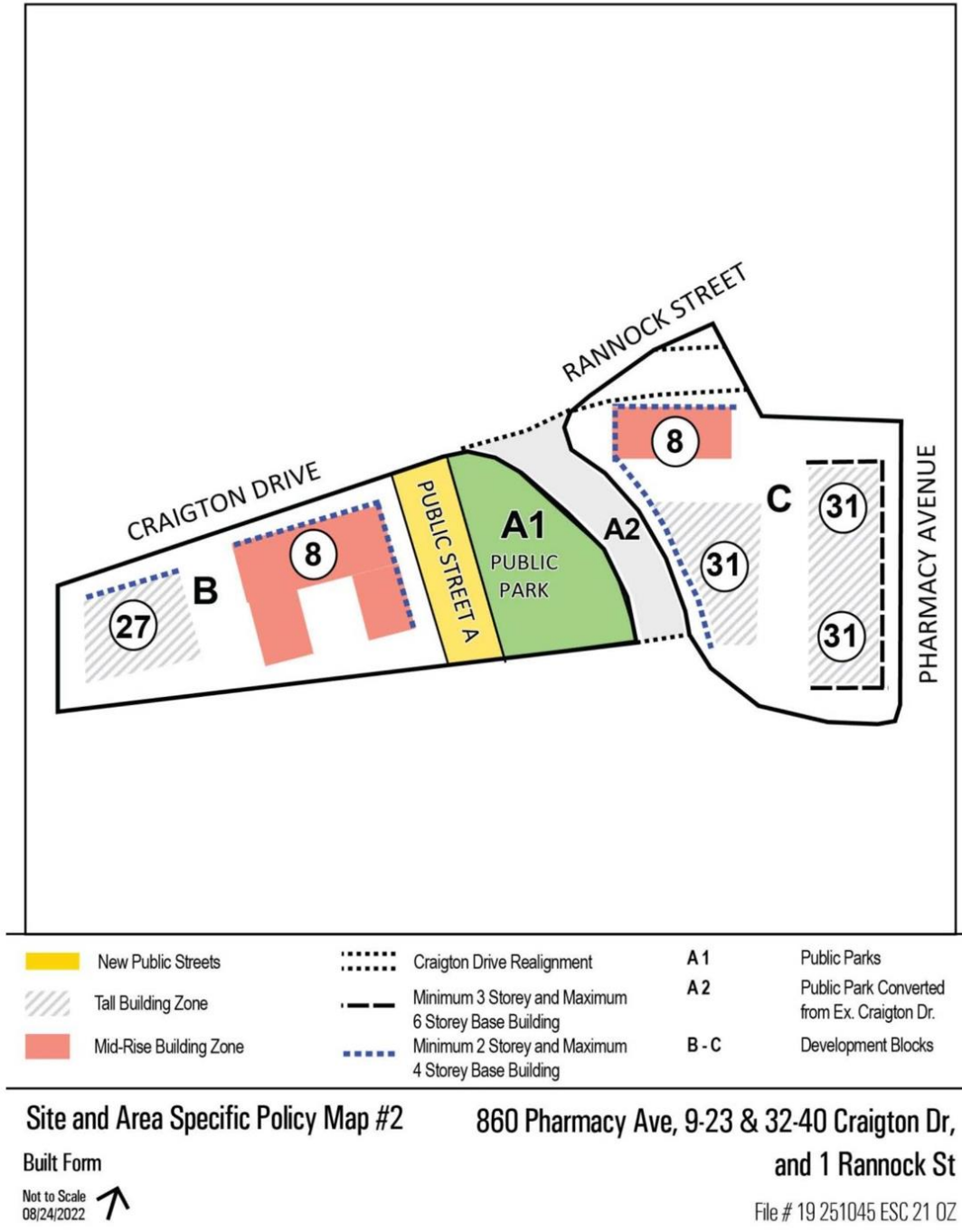
cc: Dominic Cobran, Public Consultation Unit
Cassidy Ritz, Capital Projects & Program, Transportation Services
Philip Morse, Capital Projects & Program, Transportation Services
Emily Caldwell, Community Planning, City Planning Division
Mike Dror, Bousfields Inc.
Alun Lloyd, BA Group

Attachments: Appendix A – Map 2 of Site and Area Specific Policy 820
Appendix B – Reference Diagram of Alignment 1 & 2

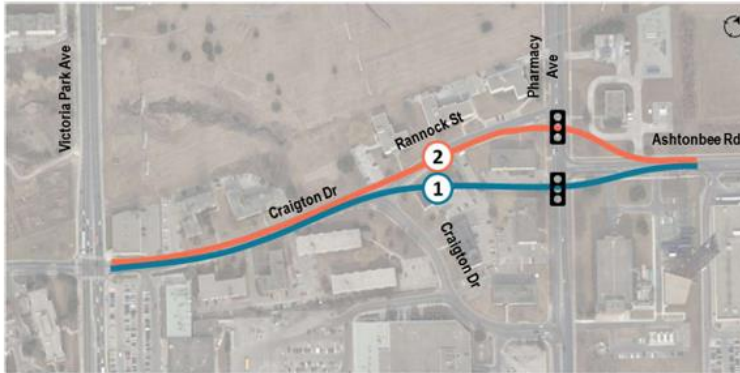




Appendix A – Map 2 of Site and Area Specific Policy 820

10
City of Toronto By-law XXX-2022(OLT)



Craigton Drive Reconfiguration




-  New signals
-  Relocate existing signals
-  Existing signals

Two street alignment alternatives were developed to improve east-west connectivity in the corridor:

Alignment 1 – Craigton Drive realigned south of Ashtonbee Road

 **Alignment 2** – Craigton Drive realigned north of Ashtonbee Road

Appendix B – Reference Diagram of Alignment 1 & 2

 Alignment 2 is identified in the City's May 13, 2024 report to Infrastructure and Environment Committee as the recommended alignment to move forward with.