



January 24, 2025

DELIVERED VIA EMAIL TO [exc@toronto.ca](mailto:exc@toronto.ca)

Executive Committee  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Mayor Chow and Members of the Executive Committee,

**RE: EX20.11 - ReNew Golden Mile Environmental Assessment: Final Report**

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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").

Starlight has active rezoning and draft plan of subdivision applications under review by the City and is preparing a third 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 1,586 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 features a public park, a number of privately-owned publicly accessible spaces (POPS), a space protected for daycare, modern indoor and outdoor amenities, retail offerings and new pedestrian and road connections.

Our project is directly affected by the recommendations of the ReNew Golden Mile Municipal Class Environmental Assessment (MCEA) due to the frontage of the Subject Site along Craigton Drive and Rannock Street, which are proposed to be realigned, redesigned and reconstructed with a new cross section requiring additional right-of-way. Appendix A provides a reference map of the Subject Site.

Over the course of the MCEA to date, we have pursued meetings and conversations with City staff regarding the Craigton alignment and provided our feedback throughout the process. Previous correspondence is included for reference in Appendix B.

We have reviewed the final report and are pleased to share our overall support for the City's recommended alignment for Craigton Drive and issuance of the Notice of Completion. However, we also reiterate our final comments on certain items from a meeting with Transportation and Community Planning staff on January 9, 2025, related to the final report.

**Summary**

In summary, our two areas of concern are:

- (1) the 3m road widening requirement for Craigton Drive being entirely taken from the south side of the roadway, reducing the volume of rental housing we can deliver; and
- (2) establishment the future construction of the realigned and redesigned Craigton Drive as Capital Project in its entirety.

We respectfully request additional discussion and collaboration with the City to resolve our concerns. The next section of our letter provides detailed comments regarding the items listed above.



## Detailed Comments:

### 1. Road widening

- The report states that *“The planned three metre street widening identified in the Official Plan along Craigton Drive is also recommended to be taken entirely from the south side of the corridor, due to the existing low-rise residential rental buildings on the north side of the corridor, and to reduce the amount of required land from Toronto Water’s Eglinton Pumping Station and Reservoir site.” (Our emphasis).*
- Prior documentation assumed that the 3m road widening would be split between landowners on both the north and south side of Craigton Avenue. Accordingly, our approved SASP 820 which guides development on the Subject Site provides that road widening of 1.5m along Craigton Drive is required. We have in designing our project thus far pursuant to this requirement.
- Appendix B demonstrates our efforts to highlight issues with a 3.0m road widening entirely on the south side of Craigton Drive. Given that the Golden Mile Secondary Plan encourages development on the north side of Craigton Drive, equal widening on both the north and south sides is reasonable.
- In response to this section of the report, there are two segments of road widening which we wish to comment on: (1) east of the intersection of Craigton Drive & Rannock Street, and (2) west of the intersection of Craigton Drive & Rannock Street.
  - (1) **Comments applicable east of the intersection of Craigton Drive & Rannock Street:**

Given the complexity of the land ownership and utilities at the intersection of Craigton Drive and Pharmacy Avenue as detailed in the report, and that our approved SASP 820 acknowledged the possibility of other alignments in this area, we appreciate the City’s efforts to negotiate Alignment #2 (the recommended North Alignment) which avoids impacts to existing and proposed rental buildings (both on the Subject Site and neighbouring properties). Therefore, on the east side of the intersection of Rannock Street and Craigton Drive, we accept that an estimated 3.0m ROW dedication forming a triangular shape in the area near our Craigton/Rannock entrance (based on the drawings provided by Transportation on December 9, 2024) is required to accommodate the realigned roadway.
  - (2) **Comments applicable west of the intersection of Craigton Drive & Rannock Street:** The imposed dedication for additional lands (an additional 1.5m) of road ROW along this portion of our site impacts the ability to deliver the anticipated / approved GFA This results in a loss of permitted floor area and thus rental housing.
- The report goes on to state *“City staff will work with the development proponents on the south side of the street to secure the additional lands using existing zoning by-law provisions where implementing zoning is in place and through the continued review of development applications.”* We are willing to work collaboratively to assist in providing some additional ROW that enables the City to more easily (without additional expropriation/acquisition) achieve the land needed to implement their desired cross section but this goodwill should not unduly penalize Starlight. For the Committee, we share and refer to our recent conversations with Transportation and Community Planning staff to work together on the proposed zoning provisions and site design to ensure that the entire difference in ROW required is not wholly taken from our developable land area but rather that setbacks, stepbacks, projections or other design measures may be explored as a compromise to minimize the impact to this purpose-built rental project. We trust that further discussion in the advancement of our zoning application with cooperation from affected City departments will resolve

the impacts of providing additional ROW. **If any related modifications are required to the SASP/OP we expect that these would be expedited in the same timeline as the ZBA.**

### Implementation

- The report states that one of the key locations that would be delivered as a Capital Project is the Craigton Drive Reconfiguration between the Craigton/Rannock intersection and the Pharmacy intersection, which we agree with. However, we are concerned that the omission of the balance of the Craigton Drive Reconfiguration from this statement implies that it is not a Capital Project and could be Starlight's obligation.
- The entire realignment and reconstruction of Craigton Drive has the merits of a Capital Project. The Craigton redesign will require a full curb-to-curb reconstruction and realignment of utilities. This redesign is not being driven by Starlight's project but rather is an existing roadway in the Golden Mile Secondary Plan (GMSP), that is peripheral to the Subject Site, extending beyond the limits of Starlight's frontage, shared by other landowners to the north, east and west. The implementation of a new street network in the GMSP generates collective benefit for the community-at-large and was recommended within the GMSP relative to the overall changes to intensify land use in support of transit-oriented development and accommodating active transportation modes. Furthermore, additional right-of-way exceeding the originally intended design is being asked of us which we plan to work with the City to accommodate. Essentially, the requirement for these road works was not prompted by Starlight's project.
- Starlight's responsibility is to contribute to upgrades that may be reasonable, relevant and necessary for our project. Any upgrades beyond this notion that benefit the community-at-large should be funded through Development Charges (DC) and if constructed by Starlight or other members of the Golden Mile Landowners Group, be eligible for DC credits. Further clarification and discussion is required with City staff to determine the extent of obligations that are reasonable, relevant and necessary for our project.

Thank you for your consideration of these comments and we look forward to continued conversation with City staff to resolve our design questions and concerns.

Sincerely,

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

Salima Kheraj  
Vice President, Development

cc: Councillor Michael Thompson  
Jacquelyn Hayward, Planning, Design & Management, Transportation Services  
Cassidy Ritz, Capital Projects & Program, Transportation Services  
Philip Morse, Capital Projects & Program, Transportation Services  
Valesa Faria, Executive Director, Development Review  
Emily Caldwell, Community Planning, City Planning Division  
Mike Dror, Bousfields Inc.  
Alun Lloyd, BA Group

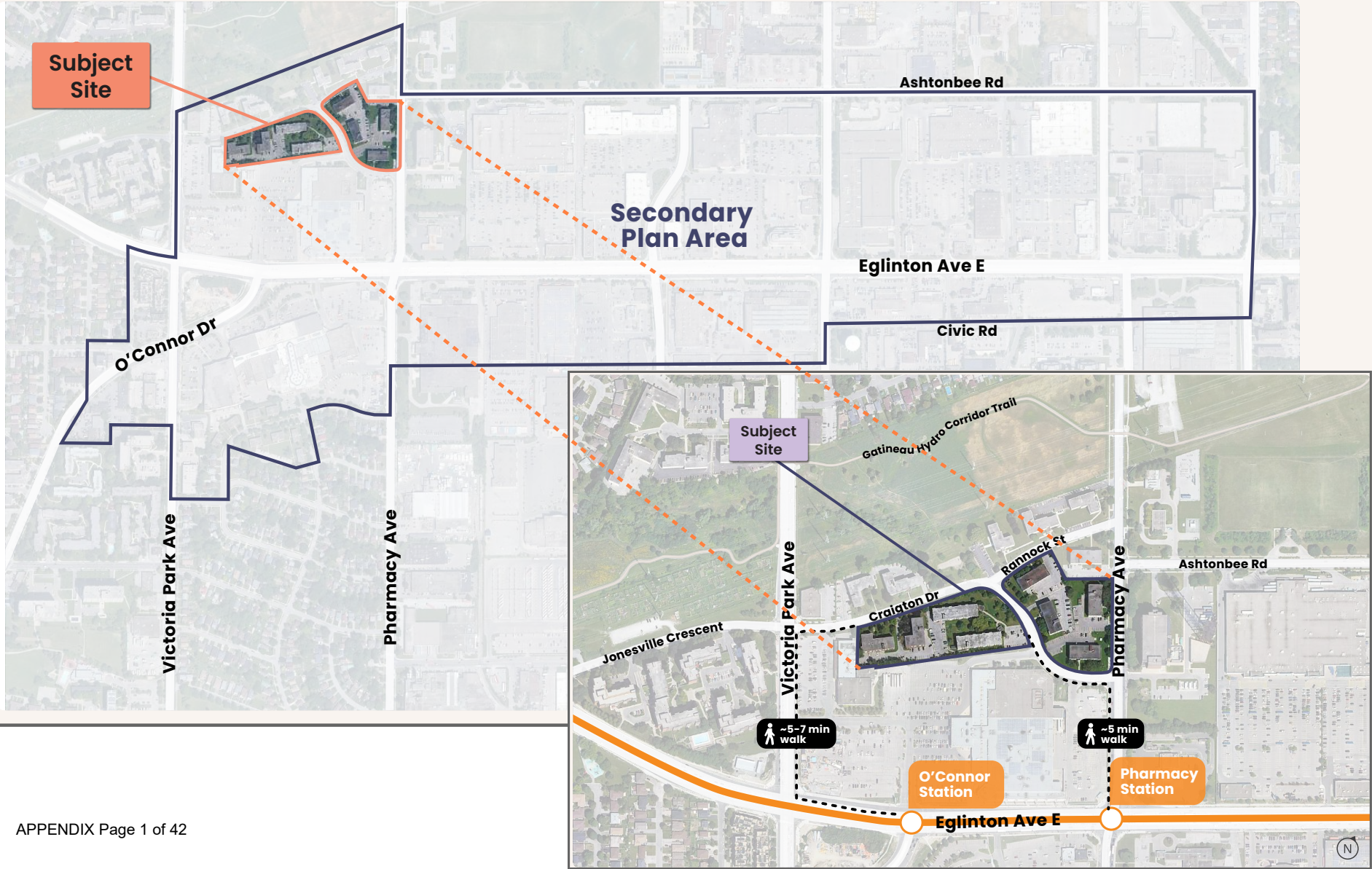
### Attachments:

Appendix A – Reference Map of Starlight's Lands  
Appendix B – Copies of previous correspondence



APPENDIX A: REFERENCE MAP OF STARLIGHT'S LANDS (the Subject Site)  
9, 15, 19, 23, 32 & 40 Craigton Drive, 1 Rannock Street and 860 Pharmacy Avenue

Golden Mile Secondary Plan



## APPENDIX B: COPIES OF PREVIOUS CORRESPONDENCE



December 3, 2024

DELIVERED VIA EMAIL

Cassidy Ritz  
Manager, Major Projects  
Transportation Services  
City of Toronto

[cassidy.ritz@toronto.ca](mailto:cassidy.ritz@toronto.ca)

Dear Cassidy,

**RE: ReNew Golden Mile: Reconfigured & New Major Streets Environmental Assessment Study: Craigton Alignment Recommendation**

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This letter is in response to the recently published recommendations by the Transportation Services department on the Craigton Drive alignment as part of the ongoing ReNew Golden Mile: Reconfigured & New Major Streets Environmental Assessment Study (MCEA) stakeholder consultations. **We support the recommendation to proceed with Alignment #2 (northerly alignment)** and are pleased to hear of the progress in conversations with other affected landowners that allow for the continued recommendation of Alignment #2.

As an abutting major landowner along Craigton Drive and Rannock Street, we are directly affected by any changes to its alignment. The conclusion of the MCEA process and final implementation of the northerly alignment as recommended is critical to continuing with our active rezoning application and investments to date in advancing our design for a thoughtful new rental community of over 1,500 homes, new retail, daycare, park space and amenities. To reiterate our previous correspondence, any change or regression to the other alternative alignments will result in the meaningful displacement of new-build rental housing supply. Or, if our project is rendered financially infeasible, a more southerly alignment will also necessarily result in the City's expropriation of 1 Rannock Street and potentially 860 Pharmacy Avenue, representing the significant loss of critical apartment stock.

As agreed to, we await a revised digital drawing of the functional plan to confirm the specifics of the alignment relative to our development application. We understand and accept that details will be worked out as design advances, and that this high-level outcome is a successful one. However, we recap our previous correspondence to the City from May 2024 (attached hereto) specifically regarding road widening on pages 2 and 3 indicating that a 3.0m widening on Craigton Drive is inconsistent with our approved SASP 820 which indicates 1.5m. We hope to review the digital plans and confirm these details in the near future, to ensure there is no impact to our ability to deliver purpose-built rental housing on this site.

Thank you for your consideration and please do not hesitate to contact us with any questions or comments.

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

**Salima Kheraj**

Vice President, Development  
[skheraj@starlightinvest.com](mailto:skheraj@starlightinvest.com)  
647-729-2567

cc. Councillor Michael Thompson  
Ashley Curtis, *Deputy GM, Strategic Management Transportation Services*  
Jacquelyn Hayward, *Director of Transportation Design & Management*  
Philip Morse, *Senior Project Manager, Capital Projects and Program, Transportation Services*  
Christian Ventresca, *Director, Community Planning, Scarborough District*  
Emily Caldwell, *Senior Planner, Community Planning, Scarborough District*

Enclosure: Letter to Infrastructure and Environment Committee from Starlight, May 2024



1400 - 3280 Bloor Street West, Centre Tower, Toronto, Ontario, Canada, M8X 2X3



September 12, 2024

DELIVERED VIA EMAIL

Cassidy Ritz  
Manager, Major Projects  
Transportation Services  
City of Toronto  
[cassidy.ritz@toronto.ca](mailto:cassidy.ritz@toronto.ca)

Jacquelyn Hayward  
Director of Transportation Design & Management  
Transportation Services  
City of Toronto  
[jacquelyn.hayward@toronto.ca](mailto:jacquelyn.hayward@toronto.ca)

Barbara Gray  
General Manager  
Transportation Services  
City of Toronto  
[barbara.gray@toronto.ca](mailto:barbara.gray@toronto.ca)

Dear Cassidy, Jacquelyn and Barbara,

**RE: Possible changes to roadway alignments, ReNew Golden Mile: Reconfigured & New Major Streets Environmental Assessment Study**

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This letter is in response to the meeting on August 26, 2024, between Starlight, Cassidy Ritz, and other transportation staff regarding the subject noted above, to discuss recent concerns expressed by Toronto Water and potential impacts to the feasibility of Starlight's development project in the vicinity. At this meeting, we learned that the City's recommendation for the North Alignment of Craigton Drive/Rannock Street (endorsed by City Council) may change to a South Alignment running through Starlight's site. Starlight is concerned that the full suite of alternatives for this alignment have not been properly evaluated and that the South Alignment represents a problematic design choice for this upcoming growth area.

If pursued, the South Alignment will result in the meaningful displacement of new-build rental housing supply. Starlight has already made investments to significantly advance the design of a thoughtful new rental community, which will be reversed if the South Alignment is chosen. Development and construction of our rental community is a challenging venture that will be jeopardized with implementation of the South Alignment. If our project is rendered financially infeasible, the South Alignment will also necessarily result in the City's expropriation of 1 Rannock Street and potentially 860 Pharmacy Avenue, representing the significant loss of critical apartment stock.

**It is our understanding that Toronto Water and other municipal agencies are meeting in the very near term to discuss alternatives to the North Alignment. Given the materiality of this decision, we respectfully request a post-hoc discussion to understand the risks to our Golden Mile project.** The outcome of this decision is critical to the delivery of over 1,500 new rental homes within the City of Toronto and implementation of the council-approved Golden Mile Secondary Plan. We are aware of several potential solutions to this unfortunate scenario that we believe could result in a beneficial outcome for all stakeholders, as well as the public good.

An optimal outcome for all stakeholders is tangibly in reach. We look forward to your response in the near future, following discussion with Toronto Water. Please do not hesitate to contact us for further engagement.

Sincerely,

**Salima Kheraj**

Vice President, Development  
[skheraj@starlightinvest.com](mailto:skheraj@starlightinvest.com)  
647-729-2567

cc. Councillor Michael Thompson  
Jag Sharma, *Deputy City Manager, Development and Growth Services*  
Christian Ventresca, *Director, Community Planning, Scarborough District*  
Emily Caldwell, *Senior Planner, Community Planning, Scarborough District*



1400 - 3280 Bloor Street West, Centre Tower, Toronto, Ontario, Canada, M8X 2X3



May 24, 2024

SENT VIA EMAIL TO [iec@toronto.ca](mailto: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**

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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

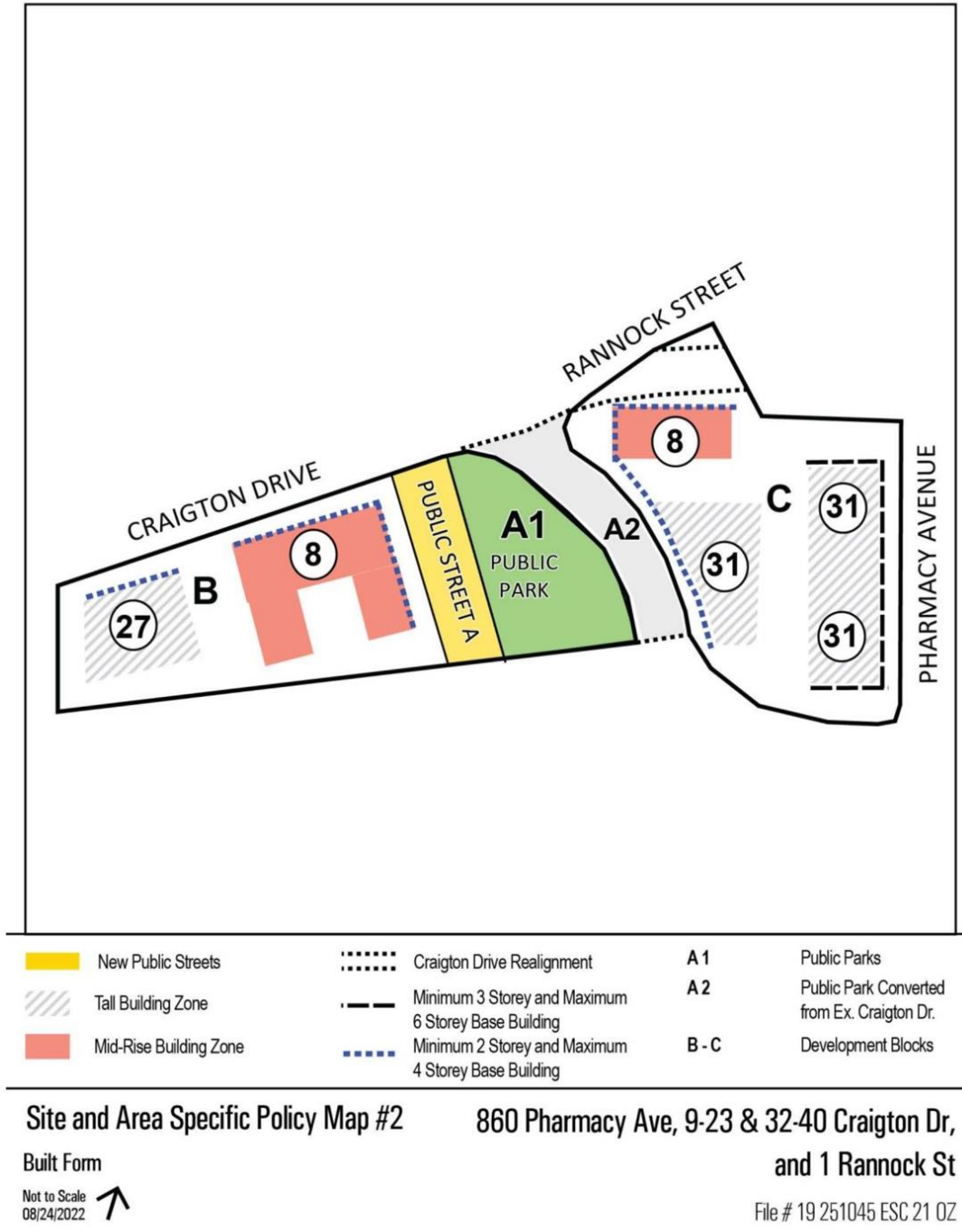
cc: Dominic Cobran, Public Consultation Unit  
Cassidy Ritz, Capital Projects & Program, Transportation Services  
Philip Morse, Capital Projects & Program, Transportation Services  
Emily Caldwell, Community Planning, City Planning Division  
Mike Dror, Bousfields Inc.  
Alun Lloyd, BA Group

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

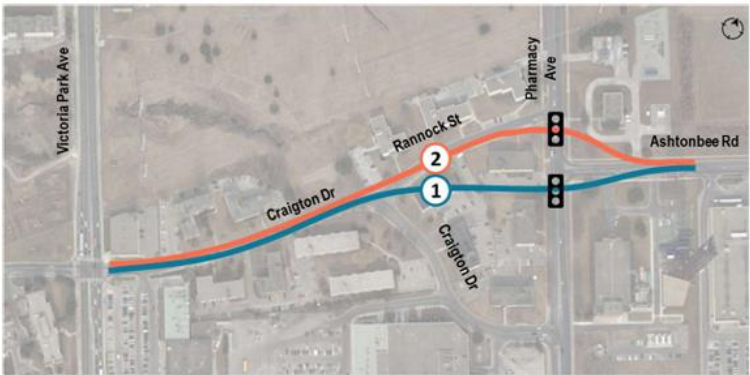





## Appendix A – Map 2 of Site and Area Specific Policy 820

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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

 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.

## Appendix B – Reference Diagram of Alignment 1 & 2



May 1, 2023

Dominic Cobran  
Senior Coordinator, Public Consultation Unit  
City of Toronto  
55 John St., 19<sup>th</sup> Floor  
Toronto, ON M5V 3C6

Dear Mr. Cobran:

**Re: ReNew Golden Mile  
Reconfigured and New Major Streets EA – Virtual Public Meeting #1  
D.D. Acquisitions Partnership Comments**

Thank you for the opportunity to provide feedback on the presentation regarding the ReNew Golden Mile Reconfigured and New Major Streets Environmental Assessment (“Golden Mile EA”). D.D. Acquisitions Partnership (“DD Acquisitions”) is 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 “DD Acquisitions Lands”).

The DD Acquisitions Lands 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 recently approved via oral decision by the Ontario Land Tribunal (“OLT”) at a settlement hearing held on December 6, 2022. As such, OPA 638 and SASP 820 are now in force.

DD Acquisitions previously provided comments on February 16, 2023, in response to the presentation given to landowners within the study area on December 13, 2022. Following the virtual Public Meeting held on April 17<sup>th</sup>, 2023, our previous comments are still applicable and have therefore been provided as an attachment to this document.

### **Comments on Presentation Materials – April 17<sup>th</sup>, 2023 – Virtual Public Meeting 1**

With respect to the Golden Mile EA Virtual Public Meeting #1 held on April 17, 2023, DD Acquisitions has reviewed the presentation materials provided by staff and offers the following comments for the City’s consideration:

#### ***Design Alternatives: Craigton Reconfiguration (General Comments)***

- Two alignments are presented for the Craigton Drive reconfiguration. No reference is made to the preferred alignment reflected, at a conceptual level, in the Transportation Master Plan (“TMP”) and Golden Mile Secondary Plan (“GMSP”) that aligns directly opposite Ashtonbee Road at Pharmacy Avenue. There is no notation as to why such an option was not considered in, at least, the pre-screening process nor the process adopted in establishing the two options reflected in the December 2022 and April 2023 presentation materials. It

is our opinion that such an option should form part of the assessment.

Essentially, the GMSP / TMP realignment for Craigton Drive, that was also an integral part of the DD Acquisitions SASP approval, appears to have been “pre-screened out” in preference for two “new” alignments that were not referenced in the TMP. Those alignments appear to have been developed to avoid impacting the existing building at 5 Rannock Street in preference to other routings, without sufficiently considering impacts to the existing buildings on the DD Acquisitions Lands, or to the built form and site organization directions established by SASP 820.

***Design Alternatives: Craigton Drive Reconfiguration (Impacts and Outcomes)***

- With respect to future conditions, Alignment 1 would have a considerable negative impact on DD Acquisitions’ redevelopment plans. In particular, Alignment 1 would significantly impact the ability to develop at least two of the planned buildings shown on Map #2 (Appendix A) of DD Acquisitions’ council-approved OPA/SASP, which is attached. These impacts would result in a significant loss in density and units, and an inability to reallocate this loss in density and units elsewhere on the DD Acquisitions Lands. This impact is particularly significant given that DD Acquisitions intends to redevelop the lands for additional purpose-built rental housing and to accommodate the replacement of all 248 rental units that exist today.
- The future density approved on the DD Acquisition Lands, and detailed in the attached SASP, is required to support a feasible rental development plan inclusive of 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.
- Considering the impacts stated above and the financial realities’ of developing a purpose-built rental housing project inclusive of rental replacement units, it would not be economically feasible to develop the East portion of the DD Acquisitions Lands if Alignment 1 is pursued. As a result, Alignment 1 would have a significant impact on the existing rental building located at 1 Rannock Street, and similar impact for both rental buildings at 860 Pharmacy Ave and 5 Rannock Street. This proposed road alignment would necessitate the removal of the entire existing rental building at 1 Rannock Street and impact the functionality of the properties located at both 860 Pharmacy Ave and 5 Rannock Street.
- Of the two alignments currently being considered ,DD Acquisitions has a strong preference for Alignment 2 due to that routing option avoiding any impact to the approved development plans and existing buildings on the DD Acquisitions Lands. Alignment 2 is also closely aligned with the existing road geometry and associated infrastructure, disturbing only the front lawns of both 5 Rannock Street and 885 Pharmacy Avenue (Eglinton Pumping Station).

It is crucial that the City carefully evaluate the impacts of Alternative 1 on the existing and future conditions of the DD Acquisition Lands. Alignment 2 is the preferred option due to the reduced impact to both future and existing conditions in the area.

### **Next Steps**

We would like the opportunity to meet and discuss these comments further. We look forward to working collaboratively with the City to advance the Environmental Assessment in parallel with our upcoming zoning by-law amendment and draft plan of subdivision approval processes for the DD Acquisition Lands.

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 DD Acquisitions 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.

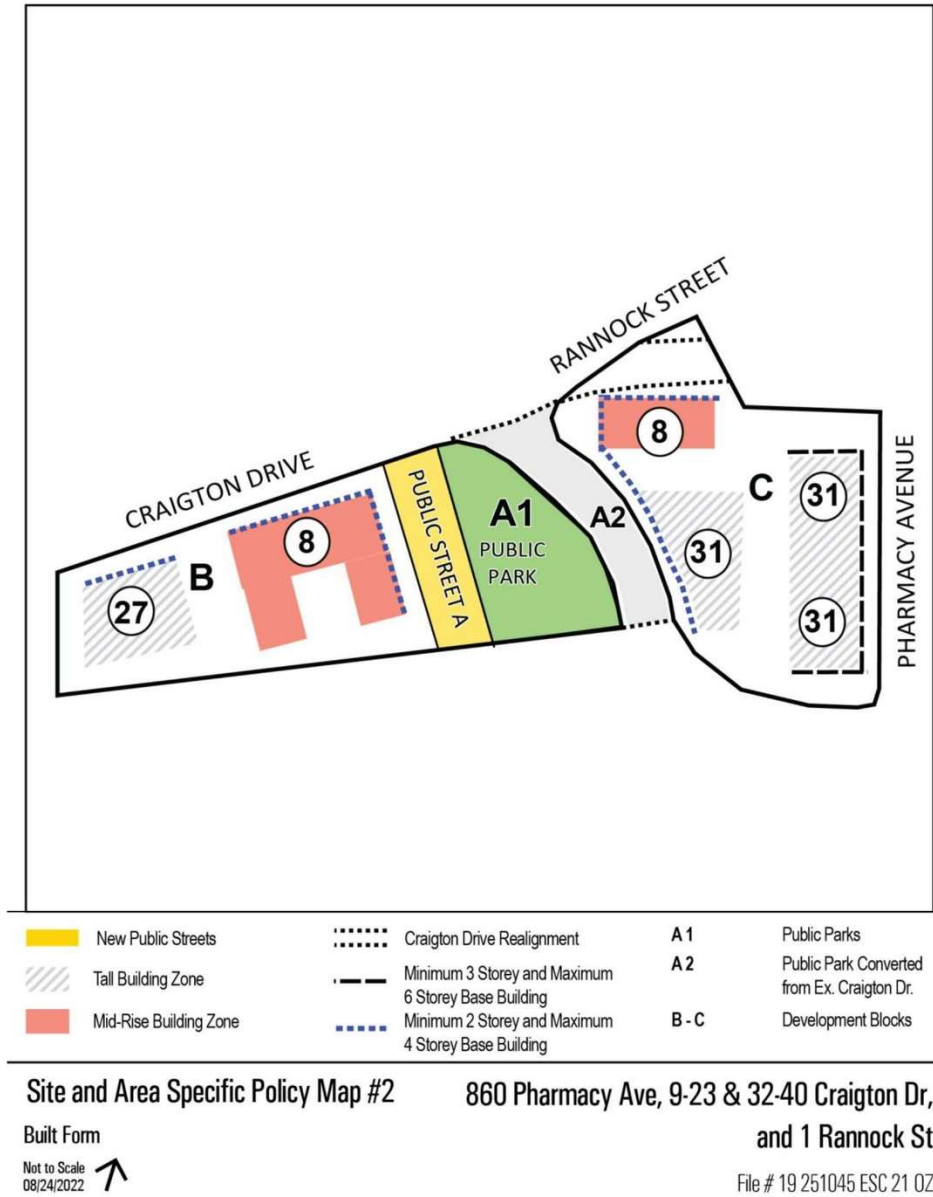
Sincerely,

A handwritten signature in cursive script that reads "Anne Messore".

Anne Messore  
Director, Development

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

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





# Golden Mile Landowners Group Inc.

7501 Keele Street  
Suite 200  
Vaughan, Ontario  
L4K 1Y2

May 3, 2023

City of Toronto  
Policy, Planning, Finance and Administration Division  
19<sup>th</sup> Floor, Metro Hall  
55 John Street  
Toronto, Ontario  
M5V 3C6

Attention: Mr. Dominic Cobran  
Senior Coordinator, Public Consultation Unit

Dear Sir:

## **Re: ReNew Golden Mile EA – Developer Meeting Presentation Comments**

On behalf of the Golden Mile Landowners Group ("GMLOG"), we wish to thank you for circulating the materials presented at the December 13<sup>th</sup> and December 15<sup>th</sup>, 2022 Landowner Workshops and the April, 2023 public consultation meeting. This letter is provided on behalf of the GMLOG in response to the materials presented, and to provide additional context for the City's consideration as part of the ReNew Golden Mile Environmental Assessment.

As an introduction, the GMLOG is comprised of 10 of the largest landowners/developers/builders located within the boundary of the Golden Mile Secondary Plan area as shown on the attached Figure (the "GMLOG Landowners"). The GMLOG was initiated to help coordinate and expedite approval of a Master Servicing Report and a Transportation Report on a coordinated, secondary plan-wide basis. This has been achieved for both such reports.

The GMLOG Landowners have entered into a funding agreement (the "Funding Agreement") to collectively fund certain studies and associated costs related to the development of their lands. Such funding is administered through a Trustee, being Golden Mile Landowners Group Inc., which is an incorporated company administered by Brattys LLP. The GMLOG Landowners have also appointed Peter G. Campbell, P. Eng of PGC Land Management Inc. as the Group Manager pursuant to the Funding Agreement. It is the intent of the GMLOG Landowners to coordinate and jointly fund infrastructure works required to be built to expedite the development of their lands.

Development planning is well underway on the GMLOG Landowners' properties, with active applications being advanced to move development towards implementation in the near future. The continued advancement

towards the first phases of development across the properties is an important focus of the GMLOG as the City undertakes its ReNew Golden Mile Environmental Assessment.

Given the above, as well as the extent of investment of the GMLOG Landowners in the area, this letter is provided as additional context for, and input into, the City's Environment Assessment process. We believe that the information being shared with the City by the GMLOG is important context for the City as it relates to the following:

- e The development of alternatives for the major infrastructure elements being assessed across the GMSP; and
- e Undertaking the assessment of those alternatives and working collaboratively with the area GMLOGe landowners.e

## **1.0 THE GOLDEN MILE LANDOWNERS GROUP (GMLOG)**

### **1.1 BACKGROUND**

The GMLOG was formed to establish a forum where broad development-related matters, including the delivery of infrastructure across the Golden Mile Secondary Plan area, could be coordinated and advanced on a collaborative basis, while recognizing the extent of development activity planned for the area.

Each of the GMLOG Landowners have made development applications to the City seeking approval for a range of mixed-use development plans for their properties. Approvals for many of the GMLOG Landowners' properties have been provided by City Council and the Ontario Land Tribunal (OLT) for Official Plan Amendments (OPA), Zoning By-law Amendments (ZBA) and in one case, a Draft Plan of Subdivision (DPOS).

The GMLOG currently includes the following 10 landowners in the Golden Mile Secondary Plan area:

- 1)e Starlight (860 Pharmacy Avenue)e
- 2)e Choice (1880 Eglinton Avenue East)e
- 3)e KingSett (1-70 Eglinton Square)e
- 4)e Mattamy (1891 Eglinton Avenue East)e
- 5)e SmartCentres (1900 Eglinton Avenue East)e
- 6)e Yorkreal Holding Inc (1910 Eglinton Avenue East)e
- 7)e Madison (1920 Eglinton Avenue East)e
- 8)e Cosmetics (1960 Eglinton Avenue East)e
- 9)e RioCan (1966-2050 Eglinton Avenue East)e
- 10)eDream (2200 Eglinton Avenue East)e

### **1.2 GMLOG LAND OWNERSHIP**

As per the above, the GMLOG represents the owners of the majority of the property holdings within the Golden Mile Secondary Plan area at large and, notably, almost all of the properties designated for mixed-use development, through which the new Golden Mile Boulevard and the O'Connor Drive Extension are proposed to be constructed.

North of Eglinton Avenue East, 7 of the GMLOG Landowners (Choice, Starlight, SmartCentres, Madison, Cosmetica, Riocan and Dream) own large properties located between Victoria Park Avenue and Birchmount Road, through which the new Golden Mile Boulevard is proposed to be constructed. At this time, the Bell parcel located east of Pharmacy Avenue is the only property north of Eglinton Avenue East that is not a member of the GMLOG.

South of Eglinton Avenue East, 2 of the GMLOG Landowners (Kingsett and Mattamy) own properties which are the subject of active development applications and through which the proposed O'Connor Drive Extension is planned to run. Notably, each of these properties are the subject of development applications that have either received (principally OPA and ZBA) approval at City Council and the OLT, or are significantly advanced in terms of the settlement arrangements with the City.

### **1.3 ROLE OF THE GMLOG**

Given the extent of redevelopment activity across the Golden Mile Secondary Plan area, the adjacencies and relationships of each of the area land-holdings and the need for coordination, the GMLOG provides a coordinating entity that enables the aligned and responsive delivery of new development and supporting infrastructure.

One of the key infrastructure elements that has formed part of the GMLOG workplan to-date has been the coordination of individual site-specific development plans between adjacent GMLOG Landowners to establish consistent and connected plans for the new street / mobility networks within Golden Mile that respond to the key objectives of the Golden Mile Secondary Plan, the supporting TMP, as well as development needs. This includes establishing alignments for the planned major east-west public streets (Golden Mile Boulevard and the O'Connor Drive Extension, as further discussed below), given their importance as not only key broad mobility network features, but also as key organizing elements influencing the arrangement of new development parcels / blocks, specific building arrangements and density deployments embodied in each of the individual site-specific applications.

## **2.0 GMLOG DEVELOPMENT APPLICATIONS, APPROVALS AND ENTITLEMENTS**

The GMLOG Landowners have been actively advancing development applications across the Golden Mile Secondary Plan area for years. It is important for the ReNew Golden Mile EA to recognize the various development applications, approvals and entitlements related to the GMLOG properties.

### **2.1 APPLICATIONS**

Site-specific OPA (Site and Area Specific or SASP), ZBA and DPOS applications have been made to the City, seeking approval for comprehensive, transit-orientated, mixed-use and master-planned developments on the GMLOG landholdings.

Individual GMLOG Landowners, and the wider GMLOG, have been actively working with City staff since the initial site-specific applications were made to the City, and have been engaged in an extensive series of

discussions with staff that followed, and in the resolution of the appeals of the site-specific applications to the OLT.

The above planning entitlement processes have led to City Council adopted settlements of the Ontario Land Tribunal (OLT) OPA, ZBA and DPOS appeals for a number of the GMLOG Landowners.

## **2.2 APPROVALS**

Site and Area Specific Policies (SASP), Official Plan Amendments and Site-Specific Zoning By-law Amendments have been recently adopted by City Council for the majority of the GMLOG Landowners' properties. These outline specific development permissions on each property and, notably, the arrangement and deployment of approved densities in each case.

The OPA approvals provide details regarding a range of planning-related aspects that guide the development of the properties, including block structure and planned new / modified street right-of-ways and any required public street widenings. The exact alignments and design of new public streets will be refined through DPOS processes for each site, which will be informed by any completed Municipal Class Environmental Assessment (i.e. the ReNew Golden Mile EA).

The approved ZBA's build upon the level of detail provided in approved OPAs for a number of the GMLOG Landowners' properties and specify particular requirements and stipulations regarding the arrangement, massing, built form, public realm and floor area allocations of the proposed buildings on each of the development blocks, including specific building locations relative to new streets and other buildings. These details were, in each case, the product of extended dialogues between the GMLOG Landowners and City staff, and were premised upon the overall proposed development arrangements that underlie each of the approved OPA and ZBAs.

A DPOS was also approved by City Council for the Choice property, which further defines the organization and alignment of new streets and park areas to be dedicated to the City to enable mixed-use development on that property.

From the perspective of the GMLOG Landowners, the development plans and associated development approval instruments for each of these proposals are premised upon an established arrangement and alignment for the various elements of the street network established within the GMSP and supporting TMP. This includes alignments for Golden Mile Boulevard and the O'Connor Drive Extension within each site plan that respond to the specific development and phasing circumstances of each property and provide coordinated routings across the Golden Mile Area, through and between each property.

## **3.0 GOLDEN MILE BOULEVARD & O'CONNOR DRIVE EXTENSION**

The alignment of both Golden Mile Boulevard and the O'Connor Drive Extension within the various GMLOG properties aligns with the provisions of the GMSP and the Golden Mile TMP, in terms of the provided right-of-way, connectivity, and subject to design details within the identified right-of-way being further advanced and key cross-section provisions of those documents.



Furthermore, the right-of-way and alignment of Golden Mile Boulevard and the O'Connor Drive Extension, and the other streets reflected in the OPA and ZBA approvals provided by City Council, are fundamental to the development plans being advanced by the GMLOG Landowners.

The properties owned by the GMLOG Landowners that will be impacted by the construction of Golden Mile Boulevard and the extension of O'Connor Drive are summarized in **Table 1**. A critical role of the GMLOG is to coordinate the alignment of both Golden Mile Boulevard and the O'Connor Drive extension, between the adjacent property owners.

**TABLE 1 GMLOG LANDS IMPACTED BY GOLDEN MILE BOULEVARD AND O'CONNOR DRIVE**

	Golden Mile Boulevard	O'Connor Drive Extension
GMLOG Property Owner	Starlight	KingSett
	Choice	Mattamy
	SmartCentres	--
	Madison	--
	Cosmetica	--
	RioCan	--
	Dream	--

In further support of the above, GMLOG's consultant (BA Group) has provided more detailed comments with respect to the alignment of both Golden Mile Boulevard and O'Connor Drive, attached hereto as Appendix "A".

## 4.0 COMMENTS ON CITY PRESENTATION MATERIALS

With respect to the ReNew Golden Mile Environmental Assessment presentation materials provided at the December 13<sup>th</sup> and 15<sup>th</sup>, 2022 meetings, such materials have also been reviewed by the GMLOG's consultant (BA Group), and their specific comments therein are attached hereto as Appendix "B".


## 5.0 ENGAGEMENT

As the GMLOG Landowners move forward with applications that range from SPAs, DPOS and ZBAs, the GMLOG looks forward to working collaboratively with the City's ReNew Golden Mile Environmental Assessment team to establish and approve alignments for both Golden Mile Boulevard and the extension of O'Connor Drive that are consistent with the development plans of the GMLOG.

Thank-you for your consideration of the foregoing and the attached. The GMLOG and/or its consultants would be happy to meet with you to discuss further and share any information and materials that our consulting team has developed to date and will be preparing as part of its ongoing efforts.

Yours truly,

**GOLDEN MILE LANDOWNERS GROUP INC.**

Per:   
Peter Mikhailich

cc: GMLOG

cc: PGC Land Management Inc.

**"Appendix A"**

(Attached)

April 28<sup>th</sup>, 2023

Peter Campbell  
PGC Land Management Inc  
8800 Dufferin St, Suite 200  
Vaughan, Ontario  
L4K 0C5

**RE: ReNew Golden Mile EA – Phases 3 and 4, Developer & Public Meeting Presentation Comments**

Dear Peter,

## **1.0 INTRODUCTION**

As you are aware, BA Group is retained by the Golden Mile Landowner Group (referred to herein as GMLOG) and has provided transportation consulting services supporting the GMLOG's work undertaken on behalf of its constituent members.

BA Group has prepared, as part of the work undertaken to date for the GMLOG, transportation assessment materials in support of member site specific approval and settlement processes and preliminary, coordinated functional road plan materials for proposed Golden Mile Boulevard and other planned streets in the Golden Mile area.

BA Group has most recently been engaged by the GMLOG to assist in their engagement with the City as part of the Phases 3 and 4 of the City's ReNew Golden Mile Environmental Assessment (referred to herein as "City EA") process as it moves forward in developing alternatives for the major new and modified streets planned within the Golden Mile area that are being planned to support the redevelopment of the area as a mixed-use community.

## **1.1 THIS LETTER**

This letter provides a summary overview of the following as part of the GMLOG's review of the City EA materials presented to date at the December 2022 Landowner Workshops and the more recent April 2023 Public Consultation meeting:

- a summary overview of the GMLOG development applications;
- work undertaken to date by BA Group; and
- a summary and commentary upon the various materials prepared by the City as part of the City EA process.

BA Consulting Group Ltd.  
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**MOVEMENT  
IN URBAN  
ENVIRONMENTS** **BAGROUP.COM**

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## 2.0 GMLOG DEVELOPMENT APPLICATIONS, APPROVALS AND ENTITLEMENTS

### 2.1 THE GMLOG

The GMLOG was formed by a number of the major landowners within the Golden Mile Secondary Plan (GMSP) area to establish a coordination group where development-related matters of the GMLOG members can be coordinated including, notably, the delivery of infrastructure across the GMSP.

The GMLOG currently includes the following 10 landowners in the GMSP:

- 1) Starlight (860 Pharmacy Avenue)
- 2) Choice (1880 Eglinton Avenue East)
- 3) KingSett (1-70 Eglinton Square)
- 4) Mattamy (1891 Eglinton Avenue East)
- 5) SmartCentres (1900 Eglinton Avenue East)
- 6) Yorkreal Holding Inc (1910 Eglinton Avenue East)
- 7) Madison (1920 Eglinton Avenue East)
- 8) Cosmetics (1960 Eglinton Avenue East)
- 9) RioCan (1966-2050 Eglinton Avenue East)
- 10) Dream (2200 Eglinton Avenue East)

We understand that the owners of 40 Eglinton Square (Metro) are also intending to join the GMLOG in the near future.

### 2.2 APPLICATIONS & APPROVALS

Each of the GMLOG members has made development applications to the City seeking approval for a range of mixed-use development plans for their properties and the majority have received approval from the City and at the Ontario Land Tribunal (OLT) of Official Plan Amendments (OPA), Zoning By-law Amendments (ZBA), and Draft Plans of Subdivision (DPOS).

The various approvals recently adopted for the majority of the GMLOG properties outline specific development permissions on each property and, notably, the arrangement and deployment of approved various development parcels and new / modified street framework noting that the exact alignments and design of new public streets will be refined through DPOS processes which will be informed by any completed Municipal Class Environmental Assessment (i.e. the City EA).

This includes alignments for Golden Mile Boulevard and the O'Connor Drive Extension within each of the development plans which form part of the City EA process.



### 3.0 GOLDEN MILE BOULEVARD & O'CONNOR DRIVE EXTENSION

The alignment of both Golden Mile Boulevard and the O'Connor Drive Extension are integrated into each of the development plans being advanced by the GMLOG members.

Each plan is reflecting – as part of the approved or proposed plans – alignments for these streets (as well as other more local streets) that respond to the development framework surrounding them and the provisions of the GMSP and the Golden Mile TMP in terms of the provided right-of-way, connectivity.

As noted above, the alignments of Golden Mile Boulevard and the extension of O'Connor Drive affect all of the GMLOG properties and the GMLOG has extended considerable effort in establishing a coordinated approach to the developing alignments of both of these important streets so that they align between adjacent property owners.

This, and the supporting work undertaken by BA Group, is discussed further in **Section 3.1**.

#### 3.1 PROPOSED GMLOG GOLDEN MILE BOULEVARD ALIGNMENT

Golden Mile Boulevard runs through – and will be advanced by – redevelopment of 7 GMLOG member properties which will, through development, evolve from the current auto-centric commercial uses towards a mixed-use community outlined in the GMSP. These 7 properties represent all the landholdings through which, with the exception of the Bell property located just east of Pharmacy Avenue, Golden Mile Boulevard will run based upon the conceptual alignment reflected in the GMSP.

Each of these properties is the subject of development applications that have either received (principally OPA and ZBA) approval at the City Council, or are significantly advanced in terms of the settlement arrangements with the City of Toronto. It is noteworthy that one property (Choice) has also received DPOS approval for the site which includes a defined alignment for Golden Mile Boulevard.

The form of development and arrangement of the supporting street networks is, as such, well established for these properties and has been the subject of extensive approvals processes with the City. The development plans for each of these proposals are premised upon an arrangement and alignment for the various elements of the street network that respond to those outlined in the GMSP and supporting TMP. Notably, this includes an alignment for Golden Mile Boulevard within each site plan, that responds to the specific development and phasing circumstances of each property and provides a coordinated routing across the Golden Mile Area as it extends through each property.

Given the importance of Golden Mile Boulevard, the GMLOG has worked collaboratively with respect to the coordination of each development application on the north side of Eglinton Avenue East, to establish a consistent, connected, and comprehensive plan for Golden Mile Boulevard. The GMLOG retained BA Group to assist in coordinating – at a preliminary level – the delivery of this street.

A preliminary functional plan has been prepared for Golden Mile Boulevard by BA Group on behalf of the GMLOG. This plan focusses at this stage on establishing the key street alignment and basic right-of-way provisions for Golden Mile Boulevard on a coordinated basis noting that further detailing and input to the street arrangements will be the subject of future POSD and engineering submissions and the current City EA process.





A copy of the current functional plan developed by BA Group for Golden Mile Boulevard is provided in **Appendix A**. A digital copy of this functional plan can be forwarded to the City EA consultant team if requested. Please note that this plan was previously provided to the City as part of earlier site specific approvals processes.

We note the following with respect to the functional plan developed for Golden Mile Boulevard:

- The alignment is consistent with the policy directives of the GMSP in terms of connectivity, extent and rights-of-way;
- The alignment reflects that established as part of various OPA / ZBA and POSD applications and respects development plan (building and parkland) arrangements that have been reviewed by City staff over an extended period and have been approved or adopted by City Council;
- The street arrangements align with the key elements of the TMP and good engineering practice in terms of alignment, proposed right-of-ways, lane configurations, and other facility provisions recognizing that further detailing and input is required as part of the ongoing City EA process; and
- The proposed alignment addresses technical matters with respect to: a) intersection geometry; b) the potential need for turning lanes at intersections with the main north-south streets across Golden Mile; and c) detailing of a number of key areas across Golden Mile.

It is the GMLOG's opinion that the alignment reflected for Golden Mile Boulevard within the consolidated functional plan prepared by BA Group and, also, those reflected within each of the development plans north of Eglinton Avenue East, provide a solid and appropriate design basis as a preferred solution, particularly from an alignment and right-of-way perspective, for Golden Mile Boulevard as part of City EA process.

The GMLOG alignment would enable Golden Mile Boulevard to be advanced in a manner that is consistent with the development approvals and settlements that have been provided by the City Council on the north side of Eglinton Avenue East while remaining consistent with the GMSP and OPA policy context and the directions established within the TMP (Phase 1/2 Environmental Assessment).

From an implementation perspective, it is understood that each property would, as envisioned within the various approvals and GMSP, advance the design detail and construction of Golden Mile Boulevard on a phased and incremental basis, through site-specific DPOS applications and related engineering submissions based upon the provisions and design specifications of the current City EA process.

We would be available to discuss the materials produced by BA Group in this regard should that be of assistance.

### 3.2 PROPOSED GMLOG O'CONNOR BOULEVARD ALIGNMENT

BA Group has completed a functional plan (attached in **Appendix B**) for the westerly portions of the extension of O'Connor Drive from Victoria Park Avenue and across the Kingsett property, to the eastern border of the Mattamy property at 1891 Eglinton Avenue East. Both Mattamy and Kingsett are members of the GMLOG while Metro (the third landholding across which this section of the O'Connor Drive Extension would run) is a prospective member.



A digital copy of this functional plan can be forwarded to the City EA consultant team should that be of assistance.

The GMLOG alignment reflected on the BA Group functional plan for the extension of O'Connor Drive connects to both Victoria Park Avenue and Pharmacy Avenue at logical locations, including the connection at the existing Metro grocery store signalized intersection on Pharmacy Avenue.

The alignment, street right-of-way, lane provisions and intersection arrangements are consistent with the alignment reflected in the GMSP and with the approved development plans for the Kingsett (Eglinton Square) property and the currently proposed plans being advanced by Mattamy (1891 Eglinton Avenue East).

It is our understanding that the current Phases 3 / 4 of the City EA is considering a number of options for the O'Connor Drive Extension as it extends across Victoria Park Avenue to Pharmacy Avenue. We note that all except one of the options reflected in the most recent presentation materials (April 2023) reflect adoption of an alignment that is consistent with that reflected within the Kingsett approved development plans and BA Group functional plan between Victoria Park Avenue and Pharmacy Avenue. Furthermore, all options for the O'Connor Drive Extension immediately east of Pharmacy Avenue are consolidated at the existing Metro grocery store signalized intersection

It is the GMLOG's opinion that the alignment reflected for the O'Connor Drive Extension within the functional plan prepared by BA Group, and those reflected within the GMLOG development plans, provide a solid and appropriate design basis, particularly from alignment and right-of-way perspectives, as a preferred solution that could be adopted for the O'Connor Drive Extension through the City EA process.

As per the discussion regarding the implementation of Golden Mile Boulevard, it is understood that the O'Connor Drive Extension would be implemented as development advances, including that on the Kingsett and Mattamy properties. DPOS and related engineering submissions would advance the detailing and construction of the O'Connor Drive Extension on a phased basis that would be based upon the provisions and design specifications of the current City EA process.

We would be available to discuss the materials produced by BA Group in this regard should that be of assistance.

## 4.0 COMMENTS ON CITY PRESENTATION MATERIALS

We, and representatives of members of the GMLOG, have reviewed the presentation materials provided by the City at the December 13th and 15th, 2022 meetings and the more recent April 17<sup>th</sup>, 2023 public meeting.

We appreciate the opportunity to provide comments as outlined below. Please note that these comments are largely focussed around the materials presented at the April 2023 meeting given that they are more advanced than those presented to the landowners in December 2022.



## General

- Specific reference to the City Council approved GMSP (OPA 499) street / transit / mobility networks and various site specific OPA / ZBA / DPOS approvals should be provided in all materials for clarity purposes given that these all reflect the current direction of City Council and the product of extended planning / development approvals processes that are, ultimately, to be supported by the street networks being assessed as part of the City EA.
- We note that the Preferred Networks provided in the April 2023 presentation reflect those from the TMP and the corresponding mapping from the GMSP were not provided. It is noted that the TMP solutions informed those included with the GMSP but the details of the mapping differ from those provided as part of the City Council adopted GMSP. The reconfiguration of Thermos Road and Sinnott Road is an example of a modification made and where the TMP networks differ from enacted City policy.

## Development Activity and Future Conditions

- We note that reference was made to development activity in the April 2023 presentation materials at a high level. However, it is considered that it would be most appropriate to include a clear, detailed presentation of the form of development and street frameworks proposed as part of each site specific application / approval. It is further suggested that the City EA recognize the key elements of those development plans and the role those have had in establishing the approved arrangement of development blocks, parcels, building locations, streets and open spaces.
- These approvals reflect City Council's direction guiding redevelopment activity across the Golden Mile Area as, in most instances for the GMLOG member properties, detailed OPA and ZBA approvals have been provided by the City building upon the provisions outlined in the Council approved GMSP.
- These are relevant considerations, particularly in the context of the development of options as part of the City EA process (i.e. those options presented in both the December 2022 and April 2023 meetings), the pre-screening exercise undertaken prior to the April 2023 public meeting and the future screening / evaluation processes that will lead to adoption of a preferred series of designs as part of the EA.
- This is particularly relevant, in our opinion, given that the City EA is being undertaken to establish new / modified streets that support the redevelopment vision of the GMSP to which the area development proposals / applications are aligned.



## Design Alternatives - O'Connor Drive Reconfiguration

### *Section: Victoria Park to Pharmacy*

- We note, further to the commentary outlined earlier in this letter, that 3 of the 5 options assessed as part of the screening evaluation and 2 of the 3 options recommended to be carried forward appear to be generally aligned (or could be) with the alignment reflected in the approved (ZBA / OPA) Kingsett development plans.
- We note that a version of Option 2 was identified in the TMP (Phases 1 and 2 of the EA) for future study and clearly reflects an option that is different from the others in this area and, importantly, the expectations of the GMSP land use planning framework. Adoption of such an alignment through the City EA would result in significant impacts to the approved Kingsett development plans and related OPA / ZBA's.
- There is a clear preference from the GMLOG and Kingsett's perspective for advancement of Options 1 or 3 in this area subject to refinement of such alignments and designs in conjunction with adjacent development planning processes.
- In this regard, any evaluation of options should be extended to include commentary on the compatibility with the GMSP with respect to the street framework it offers notwithstanding references to the *"exact location of street alignments being determined through Environmental Assessment study and / or review and approval of development applications or other implementation mechanisms deemed appropriate by the City"*. It is our opinion that the GMSP framework clearly anticipated an alignment for the O'Connor Drive Extension that differs considerably from that reflected in Option 2.
- Further commentary on the specific impacts on any particular alignment on the approved development plans should also be clearly identified. As noted specific alignment overlays on top of approved development plans should be advanced to clearly define property / development related implications of any particular option and the compatibility of a potential design arrangement with that reflected within the approved development plans and supporting functional plan materials prepared by BA Group.

### *Section: East of Pharmacy*

- We note that each of 6 alignment options presented for the O'Connor Drive Extension east of Pharmacy Avenue assessed as part of the screening evaluation appear to be consolidated as the same alignment extending eastwards from the existing Metro Grocery Store signalized intersection. Each of the 3 options identified to be carried forward for evaluation are all the same through the Mattamy property before taking alternate paths further east.
- We note that, subject to detailed refinement of alignment details, the alignment reflected is generally consistent with that reflected in the proposed Mattamy development plans (and GMSP) currently being advanced through the City planning process.



- As for other sections of the O'Connor Drive Extension, detailed overlays of proposed design arrangements with current development plans would define development related implications of alignment details.

### **Craigton Drive Reconfiguration**

- We note that the alignment alternatives presented (Options 1 and 2) do not reflect the alignment conceptually shown within the GMSP and TMP as they do not include a direct connection through the existing residential building property to connect to Pharmacy Avenue opposite Ashtonbee Road. There is no notation as to why such an option was not considered in, at least, the pre-screening process nor the process adopted in establishing the two options reflected in the December 2022 and April 2023 presentation materials.
- Further to the above, allowances were made within the approved Starlight OPA to provide an area for future dedication to the City in the event that the City EA advanced an alignment that was generally consistent with that reflected in the GMSP (i.e. directly connecting to Pharmacy Avenue opposite Ashtonbee Road).
- Alignment options that route further to the south (as per Option 1) could have significant implications to the deployment of development parcels and buildings approved as part of the Starlight OPA. Clarification is required as to the extent to which the Starlight and adjacent properties are impacted by Option 1 street arrangements to enable a focussed review of any impacts.
- There is a clear GMLOG and Starlight preference for Option 2 due to that routing option avoiding any impact to the approved development plans.
- In this regard, and as noted for the O'Connor Drive assessment, any evaluation of options should be extended to include commentary on the compatibility with the GMSP and a review of specific impacts of any particular alignment design on the approved development plans / OPA.

### **Thermos Road/ Sinnott Road Realignment**

- We note that the April 2023 presentation includes consideration of an option that aligns with the GMSP and specific City Council direction to remove any realignment of the offset intersection between Sinnott Road and Thermos Road as part of the approval of the GMSP.
- The GMLOG reiterates City Council's direction regard to the potential realignment of Thermos Road / Sinnott Road notwithstanding the TMP's prior recommendations and make particular reference to potential impacts of Options 1, 3 and 4 on the approved Dream development plans and related OPA / ZBA's which are premised upon the policy framework in the GMSP and the current property boundaries.
- There is a clear preference from a GMLOG and Dream perspective for adoption of either Options 2 or 5 noting that Option 5 responds to the GMSP framework and City Council resolution and the GMSP.





## Golden Mile Boulevard

- We note that the April 2023 materials presented 5 alternative alignment options for Golden Mile Boulevard whereas the December 2022 materials reflected one alignment with cross-section options. Four (4) of the options are proposed to advanced for further evaluation.
- It is not clear as to what the rationale is for each of the alternative alignments reflected in the April 2023 presentations in terms of what issues, constraints, design factors or other consideration that each is intending to address within the different sections of Golden Mile Boulevard as it extends eastwards from Victoria Park Avenue.
- The detailing of these alignments, including specific identification of what each option is intending to respond to, should be made clear in the context of existing development across the GMLOG member properties as well the proposed development plans.
- We note that the evaluation of options (page 58) refers to "provides future parks and open space" as a criteria used to differentiate the options without any consideration of the proposed development that each park and open space form part and will be delivered through. The extent of the evaluation is limited.
- Recognition should be made to the coordination efforts made by the GMLOG with particular respect to the development of a consolidated alignment for Golden Mile Boulevard, between Victoria Park Avenue and Birchmount Road, that aligns with the directives of the GMSP, the recommendations of the TMP and, importantly, the street alignments reflected as part of site-specific development approvals and individual development considerations.

It is our opinion that this coordinated alignment provides a solid basis for adoption as part of the EA in that the alignment is responsive to both the design needs of Golden Mile Boulevard from a geometric / cross-section perspective and the approved development plans through which it runs.

- Particular attention is drawn to the alignment detailing of Golden Mile Boulevard as reflected in the BA Group consolidated functional plan as it runs through the Smartcentres and Madison properties and across Hakimi Avenue. An alignment arrangement has been reflected on the BA Group plans which reasonably addresses the geometric issues that appear to the basis upon which at least 2 (Option 2 and 3B) of the alternate alignments presented by the City for Golden Mile Boulevard have been derived and why the Hakimi Avenue intersection design is deemed "undesirable".
- There is a clear GMLOG preference for adoption of an alternative for Golden Mile Boulevard that aligns with that developed through the coordinated efforts of the GMLOG members and the City during the planning approvals processes for the various development applications across Golden Mile. Other options



- In this regard, any evaluation of options should include commentary on the compatibility of each option with the approved development plans that Golden Mile Boulevard is intended to support and a detailing of specific impacts of any particular alignment on those approved development plans. Specific alignment overlays on top of approved development plans should be advanced to clearly define property / development related implications of any particular option.
- The ReNew Golden Mile Environmental Assessment should consider implications on the north-south connections of Golden Mile Boulevard and the modifications / improvements required to implement Golden Mile Boulevard as it crosses each of the major streets.

### Draft Evaluation Framework

- The draft evaluation framework presented in the April 2023 materials is high level and further detail is sought by the GMLOG as to the specific criteria and evaluation metrics / protocols that are to be adopted in the evaluation of options.
- The GMLOG is particularly interested in the detailed range of criteria to be used in evaluation of any alignment proposed and particularly the way that: i) the GMSP planning principles / objectives / vision are to be assessed; and ii) the way in which any impacts / implications on the number of recently approved development applications are to be assessed, measured and weighted in the overall evaluation.
- The GMLOG also looks forward to reviewing further detailed drawings / evaluation overlays and other materials that would assist in identifying the implications of one alignment option compared to another on the redevelopment plans recently approved across the Golden Mile area.

### Next Steps

The GMLOG looks forward to working collaboratively with the City through the EA process. We would be happy to meet with you to discuss the functional road plan materials developed by BA Group and share any information and materials that have been developed to date on behalf of the GMLOG and as part of site specific applications.

Sincerely,  
BA Consulting Group Ltd.



Alun S. Lloyd, P. Eng.  
Principal

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## Appendix A: Golden Mile Boulevard Consolidated Functional Plan





## Appendix B: O'Connor Drive Extension (Victoria Park Avenue to east of Pharmacy Avenue), Consolidated Functional Plan





February 16, 2023

Dominic Cobran  
Senior Coordinator, Public Consultation Unit  
City of Toronto  
55 John St., 19<sup>th</sup> Floor  
Toronto, ON M5V 3C6

Dear Mr. Cobran:

**Re: ReNew Golden Mile  
Reconfigured and New Major Streets Environmental Assessment  
D.D. Acquisitions Partnership Comments**

Thank you for the opportunity to provide feedback on the presentation regarding the ReNew Golden Mile Reconfigured and New Major Streets Environmental Assessment (“Golden Mile EA”) given to landowners within the study area on December 13, 2022. D.D. Acquisitions Partnership (“DD Acquisitions”) is very interested in collaborating with the City on this important initiative and provides the following information and comments for the City’s consideration.

**Background - DD Acquisitions Lands**

DD Acquisitions Partnership is 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 “DD Acquisitions Lands”). The DD Acquisitions Lands are located on the south side of Craigton Drive and Rannock Street within the Golden Mile Secondary Plan (“GMSP”) area and within the Study Area for the Golden Mile EA. A map showing the precise location of the DD Acquisitions Lands is below.





The DD Acquisitions Lands are currently occupied by eight existing rental apartment buildings and supporting parking facilities and landscaped spaces, accommodating 248 residential units.

The DD Acquisitions Lands 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. As such, OPA 638 and SASP 820 are now in force.

The SASP permits redevelopment of the DD Acquisitions Lands with four mixed-use and residential buildings ranging in height from 8 to 31 storeys, a new public park and new public street. Notably, the SASP provides a series of specific directions and policies that guide the future placement of new buildings that were established through detailed discussions with City staff and the Ward Councillor. These buildings, and public park, will replace the existing buildings on the property today and will, notably, incorporate the replacement of all of the existing residential rental units on the property as required by the SASP.

Map #2 to the SASP identifies the locations of the new buildings, as well as protection for the proposed realignment of Craigton Drive/Rannock Street to connect with Ashtonbee Road as shown in the GMSP (including each of the 18 maps included in the GMSP) and supporting Transportation Master Plan (Phase 1 / 2 Environmental Assessment) (“TMP”).

The SASP, and the development plans submitted as part of the OPA and settlement process leading to its endorsement by City Council and approval by the OLT, protect for the dedication of lands from the DD Acquisitions Lands to facilitate the realignment of Craigton Drive to align with Ashtonbee Road at Pharmacy Avenue as depicted in the GMSP and TMP. It is important to note that building and development arrangements were deliberately established on this basis.

A copy of Map #2 to the SASP is attached to this letter as Appendix A.

DD Acquisitions intends to advance a redevelopment of the lands over time, and on a phased basis as outlined within the SASP. DD Acquisitions is currently in the process of preparing Zoning By-law Amendment and Draft Plan of Subdivision applications for the DD Acquisitions Lands that build upon the development permissions provided in the SASP and advance towards construction of the project. We anticipate submitting the applications before the end of the first quarter of 2023.

### **Comments on Presentation Materials – December 13<sup>th</sup>, 2022 Landowner Meeting**

We have reviewed the presentation materials provided by staff at the December 13, 2022 landowner meeting and offer the following comments:

#### ***Study Area & Background***

- The presentation should make reference to and clearly recognize, as important background, the range of development applications, development approval status and site specific approvals and/or endorsements of settlements by City Council for recent surrounding OPA, ZBA and DPOS applications. These approvals reflect City Council direction guiding development across Golden Mile.

- The presentation should recognize and present the specific deployment and disposition of proposed development blocks, proposed buildings, parkland and other aspects of approved planning instruments and particularly those that may be impacted by design options being considered within the ReNew Golden Mile Environmental Assessment and should form part of the evaluations undertaken as part of the assessment.
- The presentation should recognize existing building locations – and particularly the 1 Rannock Street building – on the DD Acquisitions property – that would be affected by alignment options for the Craigton Drive / Rannock Road realignment.
- City Council specifically removed the realignment of Sinnott Road and Thermos Road as part of the approval of the GMSP. Given that fact, why are options being advanced for this particular element of the Golden Mile street network?

### ***Transportation Master Plan***

- Clear reference should be made to the recommended street network that was approved as part of OPA 499 (GMSP) by City Council, which provides the formal framework of streets guiding development in the Golden Mile area. The TMP-recommended street network map on slide 13 is not consistent with that adopted as part of the GMSP particularly as it relates to *“improvement 5 – the reconfiguration of Thermos Road to meet the existing signalized Sinnott Road”*.

### ***Street Alignment & Cross-Section Alternatives***

- Two alignments are presented for the Craigton Drive reconfiguration. No reference is made to the preferred alignment reflected, at a conceptual level, in the TMP and GMSP that aligns directly opposite Ashtonbee Road at Pharmacy Avenue.

It is unclear why the City did not include this option in the preliminary evaluations presented and thereon for further consideration in the detailed criteria based assessments that would be undertaken as part of the Environmental Assessment. It is our opinion that such an option should form part of the assessment.

Essentially, the GMSP / TMP alignment for the Craigton Drive realignment, that was also an integral part of the DD Acquisitions SASP approval, appears to have been “pre-screened out” in preference for two “new” alignments that were not referenced in the TMP and that appear to have been developed to avoid impacting the existing building at 5 Rannock Street in preference to other routings.



- The reference to impacting parcels identified for future development applies to all properties in Golden Mile as the GMSP identifies land-use changes and permissions for all properties whether they are the subject of current development applications or not at this stage.
- The use of the notation “consistent with City Policies” is too general and potentially misleading. Such references should be clarified considerably as to which policies are relevant in each instance, and which policies a particular option is consistent with or not. Particular review of GMSP policies and Council approved OPA (SASP), ZBA and DPOS approvals would be relevant in this policy context.
- As referenced earlier, while not within the immediate area of the DD Acquisitions property, it was our understanding that the approved GMSP removed, by specific Council direction, consideration of the realignment of Thermos Road to meet Sinnott Road. This raises questions relative to the how statements made in the presentation referencing that options considered are “consistent with City policies” respond to Council direction to retain the current, offset arrangement of Thermos Road and Sinnott Road across Eglinton Avenue East. It is our opinion that there is a need for justification as to why options are being considered as part of the ReNew Golden Mile Environmental Assessment in light of City Council direction and the approved GMSP. At a minimum, an option reflecting retention of the current offset condition should be reflected in the assessment and would, logically, be the only option that could be referenced as being consistent with City policy (as per GMSP).
- The coordination efforts undertaken by the Golden Mile Landowner Group (LOG) should be recognized. Those efforts include the development of a consolidated alignment for Golden Mile Boulevard between Victoria Park Road and Birchmount Road that aligns with the directives of the GMSP, the recommendations of the TMP and, importantly, the street alignment reflected as part of site specific development approvals and individual development considerations.

### **Specific Comments on Alignment Alternatives: Craigton Drive / Rannock Road - Alignments 1 & 2**

#### ***Consideration of Council Adopted Policy***

In the presentation City staff made to landowners on December 13, 2022, two proposed alignments of Craigton Drive/Rannock Road are shown:

- Alignment 1, which would realign Craigton Drive south of Ashtonbee Road; and
- Alignment 2, which would realign Craigton Drive north of Ashtonbee Road.

As referenced above, the presentation does not include a third alignment option, namely, the conceptual alignment shown in the Council-endorsed GMSP Map 45-7, which has Craigton Drive aligned to meet Ashtonbee Road directly at the intersection of Pharmacy Avenue.

To expand upon the above, the City's consideration of alternatives should, in our opinion, consider **all** alternatives, including in particular those which already form part of Council-adopted City policy and that are protected for within the Council adopted DD Acquisitions SASP. Based on the information shown on Slides 19 and 20 of the City's December 13, 2022 presentation, it appears that City staff have pre-screened out any consideration of the realignment of Craigton Drive / Rannock Road as reflected in the GMSP, rather than including it as an alternative to be evaluated like the others.

It is unclear, again building on the commentary provided on the presentation materials, how City staff reached the conclusion shown on Slide 20 that Alignment 1 and Alignment 2 are consistent with City policies, when neither alignment is reflected in the GMSP and the GMSP alignment is not shown. The statements surrounding consistency with City policy should be clarified in the context of the GMSP and SASP 820 which identifies a "Protected Area" intended to provide for the Craigton Drive / Rannock Road realignment should it be advanced in a manner reflected in the GMSP / TMP, recognizing that such alignment will be informed by the ReNew Golden Mile Environmental Assessment.

### ***Impacts on DD Acquisitions Lands***

As referenced previously, the DD Acquisitions Lands were the subject of a City Council-endorsed and OLT-approved SASP that enables the development of a mixed-use community within two development blocks, a public park block and a new public street. The SASP provides particular criteria guiding development on the DD Acquisition Lands including, as noted above, the location of tall buildings and other buildings on the property.

DD Acquisitions has been working towards submission of applications for a Zoning By-law Amendment (ZBA) and Draft Plan of Subdivision (DPOS) to facilitate the redevelopment of the DD Acquisitions Lands as contemplated by the SASP.

The development concept responds to key directions in the GMSP including the realignment of Craigton Drive / Rannock Road reflected within the GMSP (also embedded in the SASP) that facilitates its connection to Pharmacy Avenue opposite Ashtonbee Road. To that end, DD Acquisitions has been proceeding with two design options: one which is based on the realignment of Craigton Drive shown in the GMSP; and one which is based on Craigton Drive and Rannock Road remaining in their current configurations (similar to the ReNew Golden Mile Environmental Assessment Option 2). None of DD Acquisitions' design options, which have been part of ongoing settlement discussions and were considered by City Council as part of the settlement, reflect the City's proposed Alignment 1 for Craigton shown in the December 13, 2022 landowner presentation.

### *Alignment 1:*

Alignment 1 will have a considerable negative impact on DD Acquisitions' development plans that formed part of the settlement process and approval of the SASP by City Council given the apparent need for lands to be taken from the DD Acquisitions property south of the 1 Rannock Road property to facilitate the connection to Pharmacy Avenue.

Moreover, this alignment would, given the controls and limitations of the SASP, require development which does not conform with the SASP for the DD Acquisitions Lands. In particular, Alignment 1 will significantly impact the ability to develop at least two of the buildings shown on Map #2 of the SASP and the associated units, without any ability to reallocate such density, and lost units, elsewhere on the DD Acquisitions Lands. This impact is particularly significant given that it is DD Acquisitions' intention to redevelop the lands for additional purpose-built rental housing and accommodate the replacement of all 248 rental units that exist today.

The density approved by City Council and the OLT, and detailed in the attached SASP, is required to support a feasible rental development plan inclusive of rental replacement units. Due to the size of the property and physical space available for redevelopment, any negative impact to the approved density, building orientation and height would make development of much-needed new rental housing infeasible.

It is our submission that it is crucial that the City carefully evaluate the impact of Alternative 1 (and indeed all alignments) on the DD Acquisitions Lands as well, and not prioritize minimizing impacts to just one property (5 Rannock Street) as appears to have been the case from the December 13, 2022 presentation materials.

With respect to existing conditions, Alternative 1 would have a greater impact on the existing building located at 1 Rannock Street and similar impact for both 860 Pharmacy Ave and 5 Rannock Street. The Alternative 1 road alignment would necessitate the removal of the entire existing building at 1 Rannock Street and impact the functionality of the properties located at both 860 Pharmacy Ave and 5 Rannock Street.

### *Alignment 2:*

While DD Acquisitions has respected the Craigton Dr / Rannock Street realignment reflected in the GMSP, it is important to note that Alignment 2 is the least disruptive on all property owners and far more acceptable of the two options. Most notably, Alignment 2 has the least negative impact on the existing and future rental apartment buildings at both 1 & 5 Rannock Street. Alignment 1 will still have an impact on both rental properties whereas Alignment 2 has minimal impact on lands and no proposed impact to existing buildings. Alignment 1 removes most, if not all, of the existing parking at 5 Rannock Street. Whereas, Alignment 2 is also closely aligned with the existing road geometry and associated infrastructure, disturbing only the front lawns of both 5 Rannock Street and 885 Pharmacy Avenue (Eglinton Pumping Station).

### **Upcoming Public Meeting and Next Steps**

Our final comments relate to a suggestion surrounding the presentation of information to the public at the upcoming Public Information Centre and to DD Acquisitions' willingness and openness to working collaboratively with the City to advance the Renew Golden Mile Environmental Assessment.

We believe that the background section of the upcoming public meeting presentation should, as noted in our commentary on the December 13<sup>th</sup>, 2022 landowner presentation, acknowledge and reflect the current, approved development context across the GMSP area. The City and OLT have granted a number of development approvals and endorsed settlements (including OPA, ZBA and DPOS approvals) that should be reflected in the background context for the ReNew Golden Mile Environmental Assessment. The implications on such development approvals should, particularly given that the Environmental Assessment is being undertaken to establish new / modified street that support the redevelopment vision of the GMSP, form, in our view, part of the presented evaluation context for the Environmental Assessment. Not doing so in our opinion misrepresents the context of the Golden Mile EA.

Lastly, we look forward to working collaboratively with the City to advance the Environmental Assessment in parallel with our upcoming ZBA and DPOS approval processes.

Thank you for your consideration of these comments. We would be happy to meet with you to discuss.

Sincerely,

*Anne Messore*

Anne Messore  
Director, Development

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

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

