

GOLDBERG GROUP LAND USE PLANNING AND DEVELOPMENT  
2098 AVENUE ROAD, TORONTO, ONTARIO M5M 4A8

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## HOUSING ISSUES REPORT

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### PROPOSED ZONING BY-LAW AMENDMENT and RENTAL HOUSING DEMOLITION AND CONVERSION APPLICATIONS PROPOSED 29-STOREY RESIDENTIAL APARTMENT

145 St. George Street  
City of Toronto

Prepared for: **Tenblock**

May 5, 2021

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## 1.0 Introduction

Goldberg Group has been retained by Tenblock to prepare this Housing Issues Report (HIR) in support of an application to amend the City of Toronto Zoning By-laws with respect to the lands located on the northeast corner of St. George Street and Prince Arthur Avenue, municipally known as 145 St. George Street (“subject site”) (**Figure 1**) to redevelop the subject site with a 29-storey residential building on the subject site. A Rental Housing Demolition (RHD) application is being filed concurrently with the Zoning By-law Amendment (ZBA) application seeking authorization for the demolition of the existing building.

The subject site is currently occupied by a 12-storey residential building constructed in 1959, with a total site area of 2,276.0 m<sup>2</sup> (0.22 ha/0.56 ac). The subject site is located approximately 60 m from the St. George subway station and 140 m from Bloor Street West. The existing building contains a total of 130 existing rental dwelling units. The application proposes the redevelopment of the subject site with a 29-storey residential apartment building that includes an at-grade Privately Owned Publicly Accessible (POPS), 7 storey base building with tower above, and 341 dwelling units. Of the proposed units, a total of 130 rental replacement units are included, which represents full replacement of existing dwelling units in accordance with City policies. The proposed redevelopment will be integrated with the surrounding area context and provide overall enhancement to the public realm at this prominent corner location.

Section 111 of the City of Toronto Act provides authority to the City to protect rental housing stock within the city. The provisions set out in that Section prohibit demolition and conversion of any rental housing on sites that contain six or more dwelling units, unless a permit has been issued under Municipal Code- Chapter 667. Given that the subject proposal will result in the demolition of the existing building containing a total of 130 dwelling units of rental tenure, this HIR is required to examine the existing rental dwelling units on the subject site and evaluates the proposal against Section 111 – City of Toronto Act, Municipal Code – Chapter 667, the 2020 Provincial Policy Statement (PPS), the Growth Plan for the Greater Golden Horseshoe 2020 (Growth Plan), and the applicable City of Toronto Official Plan (City OP) Housing policies, including Policy 3.2.1.5 and 3.2.1.6.

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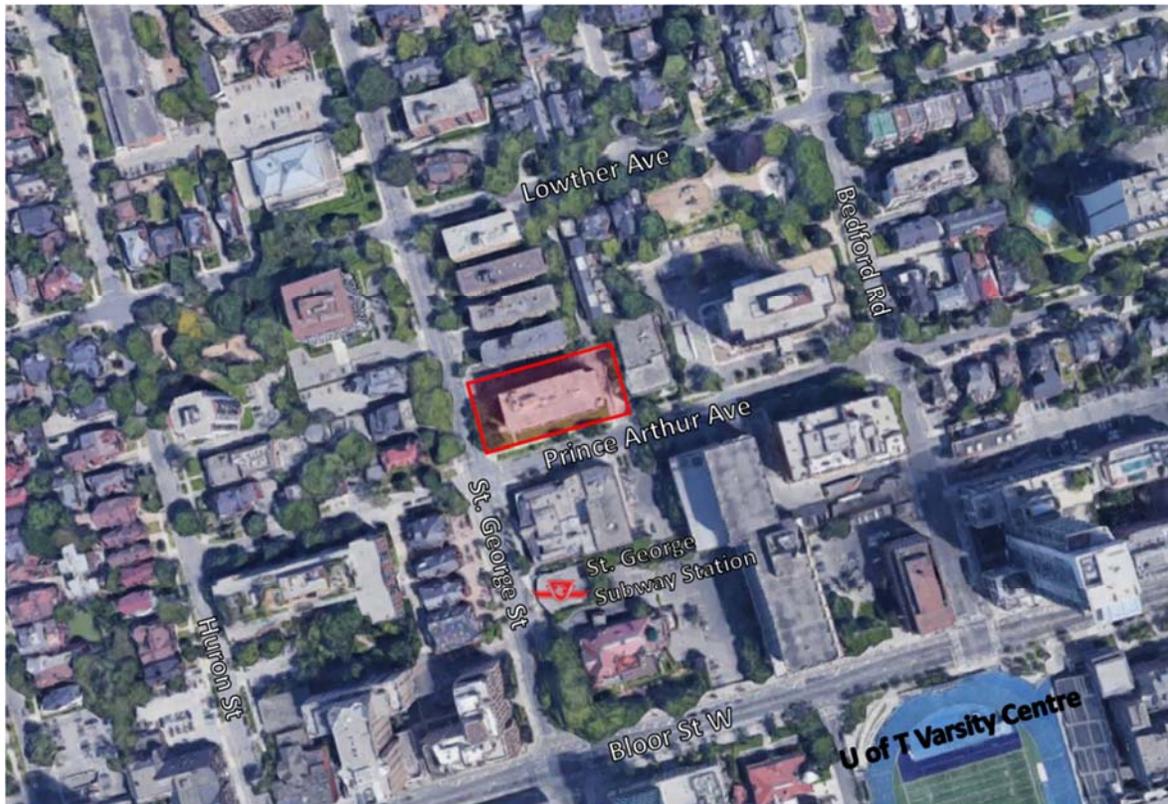
Generally, the following program is proposed by the applicant to address the rental housing replacement on the subject site:

- Of the 130 units to be demolished, 49 units are classified as “affordable” rent category and 73 units are in the “mid-range” rent category, 7 units are currently vacant, and 1 unit is occupied subject to an employment agreement and is not a tenancy. The existing 130 rental units will be wholly replaced with comparable units;
  - Replacement rental units will be new, modern, and contain additional amenities not currently included in the existing building;
  - In addition to in-suite improvements for replacement units, the new residential building will include common indoor and outdoor amenity areas, pet amenities, and secure bike storage areas, and a POPS;
  - A Public Consultation Strategy has been prepared by Bousfields Inc. and it will further detail the information session with existing tenants after the initial submission, tenant communications and an online website to facilitate communication with tenants.
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## 2.0 Location and Description of the Subject Site

The subject site is located on the north-east corner of St. George Street and Prince Arthur Avenue (**Figure 1**). The subject site is legally described as Lot 25, and Part of Lot 26 of Registered Plan 578 and Part of Lots 1, 2 & 3 of Registered Plan 25E, City of Toronto. The subject site is a rectangular shaped parcel.

Figure 1 – Location of Subject Site



Subject Site (145 St. George St): 



The subject site is approximately 2,276.0 m<sup>2</sup> (0.22 ha/0.56 ac) in size and has approximately 34.7 m of frontage on St. George Street and approximately 65.5 m of frontage along Prince George Avenue. Resident vehicular parking is located in a one-level underground parking structure, accessible from a driveway at the eastern limit of the Prince Arthur Avenue frontage. An additional driveway is located off to/from St. George Street accessing surface visitor parking for the site. There is currently no on-site common outdoor/indoor amenity for the use of residents.

The subject site is approximately 60 m from St. George subway station, which is an interchange station on both Line 1 (Yonge-University-Spadina Line) and Line 2 (Bloor-Danforth), providing servicing in all directions. This location places the subject site in a Major Transit Station Area (MTSA) that is in extremely close proximity to rapid transit infrastructure supported by proposed intensification of this site. It also sits approximately 300 m from Spadina Station and 500 m from Museum Station and is within those MTSA's.

### 3.0 Description of Existing Building & Rent Classification

#### 3.1 Existing Building and Rental Units

The existing 12 storey residential building contains a total of 130 existing rental dwelling units, which consists of 72 bachelor units, 45 one-bedroom units, 13 two-bedroom units. As of May 5, 2021, a total of 122 dwelling units are occupied, 7 are vacant and 1 is occupied subject to an employment agreement and is not a tenancy. In coordination with City staff, the appropriate course of action will be determined in how to address the rent classification of the vacant and employee-occupied dwelling units.

The rental unit distribution by unit type and average unit sizes are detailed in Table 1:

**Table 1 – Average Rental Unit Size (m<sup>2</sup>/sf)**

| Unit Type | No. of Units | Average Size (m <sup>2</sup> ) | Average Size (ft <sup>2</sup> ) |
|-----------|--------------|--------------------------------|---------------------------------|
| Bachelor  | 72           | 40.8                           | 439                             |
| 1-Bedroom | 45           | 64.7                           | 696                             |
| 2-Bedroom | 13           | 76.0                           | 818                             |

The existing dwelling units are shown in Floor Plans that will be provided directly to Housing staff in a confidential attachment

There is currently a supply of 60 parking spaces within the existing underground parking level, with a total of 24 parking spaces being leased to tenants of the existing building. Parking is leased to tenants and paid in addition to monthly rent fees. An additional thirteen (13) surface parking spaces are located along the north portion of the existing building for visitor parking use on a “pay-per-use” basis.

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Heating for all units is building controlled by way of centralized radiator/boiler system and there are no individual in-suite controls. The existing building is not equipped with central cooling or air conditioning systems. The existing building does not provide any common indoor or outdoor amenity spaces for residential use. The building contains a centralized laundry room in the basement level, equipped with four (4) washing machines and four (4) dryers that are smart-card operated.

### 3.2 Rent Classification

Based on the May 2021 rent roll, of the 130 existing rental units, forty-nine (49) of these dwelling units fall within the “affordable rent” category and seventy- three (73) dwelling unit falls within the “mid-range” category. There are no dwelling units classified in the “high-end” category. Within the unit mix, there are currently six (6) vacant bachelor dwelling units, one (1) vacant 1-bedroom unit, and one (1) unit occupied subject to an employment agreement that is not a tenancy. The owner will work with City Staff in the processing of this application, to determine the appropriate course of action to address these eight (8) dwellings units.

The details of the rental units and rent classifications will be reviewed through consultation with City of Toronto Housing staff. The rent includes heating, water, and hydro but excludes parking, cable and internet. The cost of rented parking spaces is additional to monthly rent in all cases and parking spaces are leased to tenants on an individual basis. For the purposes of rent classification, the fees levied for parking have been excluded from the base rent for each tenant.

**Table 2** illustrates the 2021 Average Rent Thresholds as follows:

**Table 2 - 2021 Average Rent Thresholds**

| Unit Type           | Affordable Rent | Mid-Range Rent     |
|---------------------|-----------------|--------------------|
| Bachelor            | \$1,211 or less | \$1,212 to \$1,816 |
| 1-Bedroom Apartment | \$1,431 or less | \$1,432 to \$2,146 |
| 2-Bedroom Apartment | \$1,661 or less | \$1,662 to \$2,491 |

Detailed information on each rental unit concerning the number of bedrooms, floor area, monthly rent, and rent classification will be provided directly to Housing staff in a

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confidential attachment. **Table 3** provides a summary of the number of units within each rent classification by dwelling unit type:

**Table 3 – Summary of Existing Rental Units, 145 St. George Street, May1<sup>st</sup>, 2020**

| UNIT TYPE    | No. of Affordable Units (< Affordable) | No. of Mid-Range Unit (< Mid-Range) | No. of High-End Units (> Mid-Range) | Total Occupied | Total Vacant | Total Units (#) |
|--------------|--|-------------------------------------|-------------------------------------|----------------|--------------|-----------------|
| BACHELOR     | 35                                     | 31                                  | 0                                   | 66             | 6            | 72              |
| 1-BEDROOM    | 10                                     | 34                                  | 0                                   | 44             | 1            | 45              |
| 2-BEDROOM    | 4                                      | 8                                   | 0                                   | 13*            | 0            | 13*             |
| <b>TOTAL</b> | <b>49</b>                              | <b>73</b>                           | <b>0</b>                            | <b>123*</b>    | <b>7</b>     | <b>130*</b>     |

\*Including one unit occupied subject to an employment agreement that is not a tenancy

## 4.0 The Proposal & Rental Replacement

### 4.1 The Proposal

The proposal seeks to demolish the existing 12-storey residential building to redevelop the subject site with a 29-storey residential building containing 341 residential dwelling units, which includes 130 rental replacement units and 211 additional dwelling units. The 130 rental replacement units within the proposed building represent 100% rental replacement, in compliance with City policies and by-law requirements regarding rental replacement. The unit distribution is as follows:

The replacement units are proposed to be distributed within the first to ninth floors of the proposed building. The rental units will be replaced at the same number and type of dwelling unit, similar size and similar rents to those in effect at the time of the redevelopment application filing. A more comprehensive description of the proposal is included in the accompanying Planning Report, prepared by Goldberg Group and filed under separate cover.

The notable features of the proposed redevelopment are as follows:

- The building will contain a total of 341 dwelling units and distributed as follows in Table 4:

Table 4 – Dwelling Unit Distribution

| Unit Type             | Rental Replacement | %            | New Dwelling Units | %           |
|-----------------------|--------------------|--------------|--------------------|-------------|
| <b>Bachelor</b>       | 72                 | 55           | 0                  | 0           |
| <b>1 Bedroom</b>      | 45                 | 35           | 151                | 72          |
| <b>2 Bedroom</b>      | 13                 | 10           | 37                 | 18          |
| <b>3 Bedroom</b>      | 0                  | 0            | 23                 | 11          |
| <b>TOTAL</b>          | <b>130</b>         | <b>100 %</b> | <b>211</b>         | <b>100%</b> |
| <b>TOTAL COMBINED</b> | <b>341 (100%)</b>  |              |                    |             |

- The residential lobby addresses St. George Street. Within the lobby are the common mail room and parcel delivery area, access to ground floor dwelling units, elevator to the floors above, ground floor amenity areas, pet amenity areas, loading and servicing areas, a short-term vehicle parking space, and bicycle storage areas.
- A publicly accessible privately owned open space (POPS) is proposed along the St. George frontage with an area of 317 square metres and is integrated with the proposed ground floor amenity areas. The POPS is designed with articulated hardscaping, high-quality landscaping, seating areas, and public art. The majority of existing trees on public and private property are preserved, subject to feasibility.
- Indoor and outdoor amenity space is provided on the ground floor and the 8<sup>th</sup> floor of the building for a total of 1,233.6 m<sup>2</sup>. A total of 719.5 m<sup>2</sup> is provided for indoor amenity and a total of 514.1 m<sup>2</sup> is provided for outdoor amenity. Amenity space plans are found in the **Appendix A**. Amenity spaces feature the following:
  - pet amenities, including pet wash stations and enclosed active areas;
  - outdoor amenity is contiguous and integrated with proposed POPS for accessibility and high-visibility from the public realm; and
  - 8<sup>th</sup> floor amenity space includes: flexible and programmable indoor amenity space, contiguous with large outdoor terrace. Outdoor terrace includes lounge areas, high-quality landscaping and plantings for screening and overall enhancement of amenity space.

- Parking is accessed from a driveway at the eastern limit of the Prince Arthur frontage. Two (2) levels of underground parking are proposed. A total of 94 parking spaces are provided as follows: 90 spaces for residential use and four (4) spaces for visitor parking spaces. One (1) of the visitor parking spaces is provided at grade for short-term use. Of the total 94 parking spaces provided, 19 will be equipped with electric vehicle supply equipment (EVSE).

#### 4.2 Rental Replacement Units

The rental replacement units will be distributed within the first to ninth floors of the proposed building. The rental replacement units will consist of:

- 72 bachelor units with an average size of approximately 40.1 m<sup>2</sup> (432 ft<sup>2</sup>);
- 45 one-bedroom units with an average size of approximately 61.3 m<sup>2</sup> (660 ft<sup>2</sup>);
- 13 two-bedroom units with an average size of 71.9 m<sup>2</sup> (774 ft<sup>2</sup>)

This unit mix provides for a variety of unit sizes, however all rental replacement units will be of comparable size to the existing dwelling units. Comparison of average unit sizes is detailed further below. A comparison of the average size of existing rental units versus the replacement units is detailed in **Table 5** below.

The existing building floor plans will be provided directly to Housing staff in a confidential attachment.

#### 5.0 Policy Framework

The policy context that applies to the subject application is the Provincial Policy Statement, 2020 (the “PPS”), the Growth Plan for the Greater Golden Horseshoe, 2020 (Growth Plan), the City of Toronto Official Plan (City OP), and City of Toronto Municipal Code Chapter 667, enacted pursuant to Section 111 of the City of Toronto Act, 2006. As mentioned, this HIR is intended to be confined to the analysis of the proposal from a housing policy perspective. Therefore, to the extent possible, it will not reproduce the land use planning analysis for the proposal as it is contained in our Planning Report being submitted concurrently.

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## 5.1 Provincial Policy Statement 2020 (PPS) and The Growth Plan for the Greater Golden Horseshoe 2020 (The Growth Plan)

The PPS 2020 came into effect on May 1, 2020. This document provides policy direction on matters of Provincial interest and all planning applications “shall be consistent with” the PPS. The Growth Plan came into effect on May 16, 2019, and was further amended on August 28, 2020 and derives its authority from the *Places to Grow Act, 2005*. The Growth Plan should be read in conjunction with the PPS, however in the event of a conflict between the Growth Plan and the PPS, the Growth Plan prevails. All applications are required to conform to the policies of the Growth Plan.

### 5.1.1 Provincial Policy Statement 2020 (PPS)

The PPS contains policies that promote and encourage development in built-up areas where services and infrastructure are available so that development can be compact, intensified where appropriate with increased density, and a mix of residential types aimed at making better, more efficient and optimized use of land and infrastructure.

Section 1.4 relates to Housing Policies and indicates the following:

- To provide an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the *regional market area*, planning authorities shall (a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through *residential intensification* and *redevelopment* and if necessary, lands which are *designated* and *available* for residential development (1.4.1(a));
  - Planning authorities shall provide for an appropriate range and mix of *housing options* and densities to meet projected market-based and affordable housing needs of current and future residents of the *regional market area* (1.4.3);
  - Permitting and facilitating all *housing options* required to meet the social, health, economic and well-being requirements of current and future residents, including *special needs* requirements and needs arising from demographic changes and employment opportunities (1.4.3.(b)(1));
  - Permitting and facilitating all types of *residential intensification*, including additional residential units, and *redevelopment* in accordance with policy 1.1.3.3 (1.4.3(b)(2));
  - Directing the development of new housing towards locations where appropriate levels of *infrastructure* and *public service facilities* are or will be available to support current and projected needs (1.4.3(c));
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- Promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of *active transportation* and transit in areas where it exists or is to be developed (1.4.3(d));
- Requiring *transit-supportive* development and prioritizing *intensification*, including potential air rights development, in proximity to transit, including corridors and stations (1.4.3(e)); and
- Establishing development standards for *residential intensification*, *redevelopment* and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety (1.4.3(f)).

### **5.1.2 The Growth Plan for the Greater Golden Horseshoe (Growth Plan)**

Many of the Provincial policy themes enunciated in the PPS have been further articulated, augmented, and strengthened in the Growth Plan. The Growth Plan generally aims to, among other things, revitalize downtowns to become vibrant and convenient centers, create complete communities that offer more options for living, working, shopping, and playing; provide greater choice in housing types to meet the needs of people at all stages of life; curb urban sprawl; protect farmland and green spaces; and reduce traffic gridlock by improving access to a greater range of transportation choices. Similar to the PPS, the Growth Plan encourages compact, vibrant complete communities, optimizing the use of land and infrastructure in order to support growth in a compact efficient form.

Section 2.2.6 of the Growth Plan deals with housing. Section 2.2.6.1 (a)(i) of the Growth Plan speaks to housing and the need to “identify a diverse range and mix of housing options and densities, including additional residential units and *affordable* housing to meet projected needs of current and future residents.”

Policy 2.2.6(2) states that, in implementing Policy 2.2.6(1), municipalities will support the achievement of complete communities by: planning to accommodate forecasted growth; planning to achieve the minimum intensification and density targets; considering the range and mix of housing options and densities of the existing housing stock; and planning to diversify the overall housing stock across the municipality.

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In accordance with Policy 2.2.6(3), municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.

### **5.1.3 Summary of The PPS and The Growth Plan**

The subject site is located within an area as defined by the Growth Plan as a *Major Transit Station Area* and is in an area of the City where growth is planned and encouraged. The subject site is approximately 60 m from St. George Subway Station which is well within the 500 m radius of a Major Transit Station Area. The subject site is also within 300 m of Spadina Subway Station to the west, and 500 m of Museum Subway Station to the east. The proposal satisfies many of the PPS and Growth Plan policy objectives. In particular, the subject site's proximity to the St. George Subway Station and other modes of active transportation, such as walking and cycling, contribute to the ongoing utilization of transit, minimizing vehicle trips, and promoting energy efficiency. The subject site is also located within short and convenient walking distance to employment uses and major institutional uses, shopping, entertainment and dining.

The PPS housing policies of Section 1.4 identify the need for municipalities to provide for an appropriate range of housing options and densities and directs new development towards appropriate locations where the levels of infrastructure and public services are available. The PPS also promotes densities for new housing that efficiently use land, resources, infrastructure, public service facilities, and supports the use of alternative transportation modes and transit. The proposed development provides for 100% rental replacement, introduces a range of unit types and sizes in the neighbourhood, and proposes an increase in density within an area that is rich in commercial, institutional, retail, and office services that is exceptionally well-served by transit.

From a Growth Plan perspective, the increased number, broadened range, and greater choice of housing, together with proximity to a subway station contributes to achieving a more complete community in this part of the City. The increase in density on this underutilized site will support and contribute to the viability of existing and planned transit infrastructure and service levels in the area. In view of the above, the subject application is consistent with the PPS and is in conformity with the Growth Plan.

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## 5.2 City of Toronto Official Plan (City OP)

### 5.2.1 Housing Policies – City OP

The City OP provides policy direction concerning the provisions of housing. For instance, Section 1.2 of the City OP provides the ‘Principles for a Successful Toronto’, wherein one of the principles promoted is that “housing choices are available for all people in their communities at all stages of their lives”.

Section 3.2.1 provides the Housing Policies of the City OP, including the following:

- 3.2.1.1 “A full range of housing, in terms of form, tenure and affordability, across the City and within neighbourhoods, will be provided and maintained to meet the current and future needs of residents. A full range of housing includes: ownership and rental housing, affordable and mid-range rental and ownership housing...housing that meets the needs of people with physical disabilities...”
- 3.2.1.2 “The existing stock of housing will be maintained and replenished. New housing supply will be encouraged through intensification and infill that is consistent with this Plan.”
- 3.2.1.3 “Investment in new rental housing, particularly affordable rental housing, will be encouraged by a co-ordinated effort from all levels of government through implementation of a range of strategies, including effective taxation, regulatory, administrative policies and incentives”

The above policies speak to ensuring that both the current and future needs of residents are met across the City and within neighbourhoods. This is aimed at accommodating growth generally in the City and within different neighbourhoods to ensure that housing choices and needs are addressed and accommodated where people live. In doing so, people seeking housing alternatives in their neighbourhood can be accommodated within the neighbourhood without the need to dislocate, due to their housing needs. This is particularly pertinent to families and our aging population.

Section 3.2.1.6 of the City OP indicates the following:

- 3.2.1.6 New development that would have the effect of removing all or a part of a private building or related group of buildings, and would result in the loss of six or more rental housing units will not be approved unless:
-

- a) all of the rental housing units have rents that exceed mid-range rents at the time of application, or
- b) in cases where planning approvals other than site plan are sought, the following are secured:
  - i. at least the same number, size and type of rental housing units are replaced and maintained with rents similar to those in effect at the time the redevelopment application is made;
  - ii. for a period of at least 10 years, rents for replacement units will be the rent at first occupancy increased annually by not more than the Provincial Rent Increase Guideline or a similar guideline as Council may approve from time to time; and
  - iii. an acceptable tenant relocation and assistance plan addressing the right to return to occupy one of the replacement units at similar rents, the provision of alternative accommodation at similar rents, and other assistance to lessen hardship, or
- c) in Council's opinion, the supply and availability of rental housing in the City has returned to a healthy state and is able to meet the housing requirements of current and future residents. This decision will be based on a number of factors, including whether:
  - i. rental housing in the City is showing positive, sustained improvement as demonstrated by significant net gains in the supply of rental housing including significant levels of production of rental housing, and continued projected net gains in the supply of rental housing;
  - ii. the overall rental apartment vacancy rate for the City of Toronto, as reported by the Canada Mortgage and Housing Corporation, has been at or above 3.0 per cent for the preceding four consecutive annual surveys;
  - iii. the proposal may negatively affect the supply or availability of rental housing or rental housing sub-sectors including affordable units, units suitable for families, or housing for vulnerable populations such as seniors, persons with special needs, or students, either in the City, or in a geographic sub-area or a neighbourhood of the City; and
  - iv. all provisions of other applicable legislation and policies have been satisfied."

The existing rental units on the site are subject to the policies of Section 3.2.1.6(a) and (b). As described above, the redevelopment proposal would have the effect of removing all of dwelling units within the existing building resulting in the loss of six or more rental dwelling units.

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The existing 130 rental dwelling units that are proposed to be demolished on the subject site are within the rental range level that requires the consideration of Policy 3.2.1.6(a). In response to Policy 3.2.1.6(b), the proposal will provide the same number and type of rental units and will be of comparable size. Comparison of the average unit sizes of existing and proposed dwelling unit sizes are detailed in Table 5 below:

**Table 5 – Average Unit Comparison: Existing versus Proposed Dwelling Units**

| Unit Type                    | Number | Average Existing Size (m <sup>2</sup> ) | Average Proposed Size (m <sup>2</sup> ) | Average Existing Size (ft <sup>2</sup> ) | Average Proposed Size (ft <sup>2</sup> ) | % Change in Average Unit Sizes |
|------------------------------|--------|---|---|--|--|--------------------------------|
| <b>Bachelor</b>              | 72     | 40.8                                    | 40.1                                    | 439                                      | 432                                      | 1.7%                           |
| <b>1-Bedroom<sup>2</sup></b> | 45     | 64.7                                    | 61.3                                    | 696                                      | 660                                      | 5.3%                           |
| <b>2-Bedroom</b>             | 13     | 76.0                                    | 71.9                                    | 818                                      | 774                                      | 5.3%                           |

The replacement unit sizes will be comparable to existing sizes. In addition, the replacement units offer improvements/enhancements over existing conditions. The proposed building will incorporate a Privately-Owned Publicly Accessible Open Space (POPS), indoor and outdoor amenity areas, pet amenity facilities, underground parking, and secured bicycle parking storage areas. The proposed replacement units will be similar in size and will include appliance upgrades, central heat/air conditioning with in-suite controls, and in-suite laundry facilities. Additional common indoor and outdoor amenity areas are also proposed on the ground floor, and 8<sup>th</sup> floor of the building (**Appendix A**).

The applicant will work with City staff and tenants to determine an appropriate Tenant Relocation and Assistance Plan.

It is our opinion that the proposal conforms to the applicable housing policies of the City Official Plan.

### **5.2.2 Housing Policies – The Downtown Secondary Plan**

The subject site is located within the Downtown Secondary Plan. With respect to housing, the Downtown Plan seeks to provide more detailed vision for Downtown Toronto. Provisions for new housing and the need to meet the needs of households for those with

children, youth and seniors are included in the plan. The Downtown Plan refers to vertical communities that meets the needs of vulnerable populations, as well as lower to middle income households for whom rising housing costs are a growing concern, will be required. This stock provides much needed diversity of housing types for vulnerable residents that are not typically found to the same extent in other areas of the City.

The specific policies of the Downtown Plan that apply to the subject site are:

- 11.1 To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 80 new residential units will include:
    - 11.1.1 a minimum of 15 per cent of the total number of units as 2-bedroom units;
    - 11.1.2 a minimum of 10 per cent of the total number of units as 3-bedroom units;
    - 11.1.3 an additional 15 per cent of the total number of units will be a combination of 2-bedroom and 3-bedroom units, or units that can be converted to 2 and 3-bedroom units through the use of accessible or adaptable design measures.
  - 11.3 Residential units will include where appropriate: storage space; operable windows; bedrooms that contain closets and the provision of balconies or terraces shall be encouraged.
  - 11.4 Where new development would have the effect of removing all of part of a private dwelling or related group of buildings, and would result in the loss of ten or more dwelling rooms, excluding dwelling rooms operated by a post-secondary institution or similar residences, the City may request an acceptable tenant relocation, and assistance plan to lessen the hardship.
  - 11.5 New development that would have the effect of removing all or part of a private building or related group of buildings, and would result in the loss of ten or more dwelling rooms, may also be requested as a community benefit in accordance with and subject to the applicable legislation to:
    - 11.5.1 replace and maintain at least the same amount and residential floor area as rental housing; and
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- 11.5.2 for the period of at least 10 years, the rents for replacement housing will be similar to those in effect at the time the development application is made.

The unit mix including both rental replacement and new dwelling units achieves the unit size requirements of policy 11.1. As described earlier in Table 4, existing units will be wholly replaced with the same number and type and with comparable average size units. The new dwelling units meet the minimum 10% of 3-bedroom units and a minimum 15% of 2-bedroom units. In response to policy 11.4 and 11.5, as mentioned previously, the owner and City staff will work together to formulate an acceptable tenant relocation and assistance plan for existing residents as this application process advances.

### **5.3 City of Toronto Municipal Code Chapter 667 – Residential Rental Property Demolition and Conversion**

City of Toronto Municipal Code Chapter 667 is the City of Toronto Residential Rental Property Demolition and Conversion Control By-law, enacted pursuant to Section 111 of the City of Toronto Act, 2006. The provisions of this chapter regulate the demolition and conversion of residential rental properties within the City. Since the subject application seeks to demolish and replace more than six (6) existing rental apartment units, the subject proposal will require a permit in accordance with Chapter 667.

### **6.0 Overall Conclusions**

It is our opinion that the proposal incorporates a rental replacement element that meets the intent of the housing related policies of the PPS, the Growth Plan, the City Official Plan, specifically Policy 3.2.1.6(b), and the housing policies of the Downtown Plan. The proposal provides for additional housing, on a subject site that is located within the *Downtown area*, in extremely close proximity to existing transit, parks, schools and other amenities of daily living, such as retail and entertainment.

The proposed rental replacement units and overall program will represent a significant improvement in housing and amenity as compared to the existing building that was originally built in 1959. The rental replacement units will be of higher quality with modern elements not currently included in the existing building, as well as the provision of indoor and outdoor amenity areas. The owner will coordinate with City staff to formulate an

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appropriate tenant relocation and assistance plan to guarantee protection of rental tenure, guaranteed rental structure and assistance in relocation.

In view of the above, it is our opinion that the application of rental housing demolition (RHD) in accordance with Municipal Code Chapter 667 and is appropriate and desirable and is consistent with Section 111 of the City of Toronto Act , and accordingly should be approved.

## **APPENDIX A**

### **GROUND FLOOR AND 8<sup>TH</sup> FLOOR AMENITY PLANS**

