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May 23, 2023

Graham Haines, Senior Planner
Strategic Initiatives, Policy & Analysis (SIPA)
City Planning – Metro Hall
55 John Street – 22nd Floor
Toronto, Ontario
M5V 3C6

Dear Graham Haines:

**RE: Housing Issues Report Addendum (Revised)
145 St. George Street, City of Toronto
File No. 21 155923 STE 11 OZ, 21 155930 STE 11 SA and 21 155940 STE 11 RH**

INTRODUCTION

We are the planning consultants for Tenblock, owners of the lands, municipally known as 145 St. George Street (the “subject site”). This Housing Issues Report Addendum (HIR Addendum) is in support of a Zoning By-law Amendment (ZBA) application, Site Plan Approval (SPA) and Rental Housing Demolition (RHD) application. This HIR Addendum is to be reviewed in conjunction with the other plans and reports submitted with the ZBA and SPA under separate covers.

Housing comments were received by staff on July 8, 2021. This letter is an addendum to the original HIR submitted, and provides a formal response to comments related to the RHD and Housing Issues Report (HIR).

Following changes have been made in the updated proposal:

- Total unit count has increased by additional 57 units from the first submission to total of 398 units as shown in the table below.

	Bachelor	1-Bedroom	2-Bedroom	3-Bedroom	TOTAL
Rental Replacement Units	72	45	13	n/a	130
New Affordable Units	0	7	3	2	12
Market Units	29	156	39	32	256
TOTAL	101	208	55	34	398

- Three (3) of the proposed 2-bedroom market units are townhomes at grade, facing south with direct access from Prince Arthur Avenue.
- 142 rental replacement and new affordable rental units are located in the podium from the mezzanine to the 7th floor with shared access with market units to main building entrances, elevators, indoor and outdoor amenity spaces, and other facilities provided in the building.
- Market units are located within the tower of the proposed development from the 9th floor to 28th floor.
- All units will be provided with modern features including air conditioning, in-suite laundry, dishwashers, etc.
- The previously proposed 94 parking spaces are reduced to five (5) visitor and car-share parking spaces located at grade. The elimination of long-term resident parking complies with the standards of By-law 89-2022 and supports City Council's climate change and transportation goals, as detailed further in the enclosed Planning Addendum Letter prepared by our office. The applicant is prepared to provide support to eligible tenants who will no longer be able to lease parking upon return to their replacement apartments, and are discussed with City staff in this regard.

Current tenants have been informed and updated on the ongoing status of the application, as well as the rental replacement process and compensation via three tenant notices to date (April 2021; May 2021; and January 2023). An applicant-led tenant meeting was held in September 2021. A Community Consultation Meeting was held in October 2021. In addition, the Annex Residents' Association has been updated via presentation meetings in May 2021, November 2021 and April 2022.

RESPONSE TO COMMENTS

Please find below our responses to comments in the formal Strategic Initiatives, Policy & Analysis (SIPA) dated July 8, 2021. The numbering set out below corresponds to numbering in above-noted letter.

SIPA (Housing Policy) – General Housing Comments

Comment:

1. *The provision of 37 (17.5%) net-new two-bedroom units and 23 (10.9%) net-new three-bedroom units **does not support** the unit mix requirements of Downtown Secondary Plan. As noted above, the Downtown Secondary Plan requires a minimum of 15% 2-bedroom units, a minimum of 10% 3-bedroom units, and an additional 15% of units as some combination of 2- and 3-bedroom units. **The revised overall unit mix is deficient by 11.6% in 2- and 3-bedroom units. The applicant***

is to revise the application to meet the unit mix requirements of the Downtown Secondary Plan.

Response:

The revised proposal provides 42 two-bedroom units (15%) and 34 three-bedroom units (12%) out of 268 net new units. In addition, 40 (15%) convertible units are available to become either two- or three-bedroom units. See updated architectural plans prepared by architectAlliance, dated April 19, 2023.

2. *0 of the 211 net-new units (0%) are proposed two bedroom units larger than 87 square metres. The proportion of proposed two-bedroom units that are larger than 87 square metres do not adequately support the unit size objectives of the Growing Up guidelines to accommodate within new development a broad range of households, including families with children.*
3. *0 of the 211 total units (0%) are proposed three-bedroom units larger than 100 square metres. The proportion of proposed three-bedroom units that are larger than 100 square metres do not adequately support the unit size objectives of the Growing Up guidelines to accommodate within new development a broad range of households, including families with children. The applicant is requested to increase the size of the two- and three-bedroom units to meet the unit size objectives of the Growing Up guidelines.*

Response:

The proposal provides net new two-bedroom units ranging in size from 57 to 113 sq. m. and net new three-bedroom units ranging in size from 70 sq. m. to 80 sq. m. These units will be designed with open concept layouts for increased space efficiency and functionality. A variety of unit sizes and types will help to meet distinct needs of different families, as outlined in the Growing up Guidelines. In our opinion and, at this stage in the development approval process, this proposal has had an appropriate regard for the Growing Up Guidelines.

4. *The applicant is to indicate whether the new dwelling units proposed will be of rental or condominium tenure.*

Response:

The proposal includes 130 rental replacement units, 12 new affordable rental units, and 256 dwelling units for which the tenure has not yet been determined.

New Affordable Housing

Comment:

5. *If Section 37 community benefits will be provided by the owner as part of this development application, we encourage net-new affordable housing to be included to*

support the City's and Growth Plan's housing policy objectives to provide a full range of housing (tenure and affordability) within new developments.

6. *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 recognizes the importance of planning for a range and mix of uses on lands near existing and planned frequent transit, including second units and affordable housing to support existing and planned transit service levels. Given the site's location near an existing major transit investment or a priority transit corridor, there is a significant public interest for including affordable housing units within this new development.*
7. *The provision of affordable and/or mid-range purpose-built rental units within this proposed development, in addition to those required to be provided as rental replacement, will support the City's housing policy objective to provide for a full range of housing by tenure and affordability within new developments.*

Response:

In coordination with the City staff, Tenblock is proposing additional 12 net new affordable rental units in the building. Under this approach, units with returning tenants would be replaced at the same bedroom type, same rent range category and as close as possible to existing sizes, which meets the City's standard rental replacement requirements. However, units without returning eligible tenants would be reduced in size to match the average size of the market units in the development. These units would still be replaced at the same bedroom type and same rent range category. The resulting 'freed up' net leasable area would be used to create net new rental replacement units, which would be secured at the affordable rent category. These net new affordable rental units will meet the same requirements of the Downtown Plan with a minimum requirement of 15% 2-bedroom units, 10% 3-bedroom units, plus another 15% as 2- or 3- bedroom units or the ability to convert units to achieve that additional 15%.

Open Door Program

Comment:

8. *The City's Open Door for Housing program provides incentives for the creation of new affordable housing beyond those required by the Official Plan, subject to certain terms and conditions. We encourage the applicant to consider the Open Door program. Further information on the program can be found on the Open Door Affordable Housing Program website.*

Response:

Noted.

Comments relating to the rental housing replacement proposal

Comment:

9. *A Rental Housing Demolition application has been received and deemed complete. In order to continue the review of the rental housing demolition application, the following additional information and steps are required:*
- a. A site visit (once safe to conduct) to confirm the existing conditions and floorplans;*
 - b. Furnished floor plans for the proposed replacement units;*
 - c. Information on the last-paid rents for the vacant rental dwelling units;*
 - d. A chart detailing the size of each proposed replacement rental unit and the total Gross Floor Area of all rental replacement units, in comparison to the individual and total size of each existing rental dwelling unit;*
 - e. Details of proposed consultation with tenants regarding the application process and development phase such as: notification of this application; layouts of replacement units; programming of amenity spaces and preparing the tenant relocation and assistance plan;*
 - f. Names and mailing addresses of tenants, to be provided directly to staff;*
 - g. The development of a suitable Tenant Relocation and Assistance Plan, in consultation with City staff. This tenant assistance plan should include an increased notice period, compensation beyond the requirements of the Residential Tenancies Act in order to mitigate hardship and/or the provision of an alternative rental unit, assistance to special needs tenants, and the right to return to a replacement unit;*
 - h. A City-led tenant consultation meeting once Housing Policy staff are generally satisfied with the rental replacement proposal; and*
 - i. Further information and materials may be requested during the ongoing review of the Rental Housing Demolition application.*

Response:

The requested additional information will be provided in a separate, confidential submission in coordination with the staff.

Terms have been agreed upon between the applicant and the staff.

Following coordination with Housing staff, a City-led tenant meeting will be coordinated with the applicant.

Comment:

10. *An addendum to the Housing Issues Report and the Planning Rationale should be submitted and confirm the following:*
- a. That the rents of the replacement units will be secured for at least 10 years from the date of occupancy of each rental replacement unit;*
 - b. That the replacement rental units will be secured as rental for at least 20 years from the date of occupancy of each rental replacement unit; and*

- c. *That tenants of the replacement rental units will have access to the all new indoor and outdoor amenity spaces of the new building.*

Response:

This addendum hereby confirms the items above in Comments 10 (a-c).

Comment:

11. The floor plans of the existing residential rental building demonstrate that all existing rental dwelling units have private balconies or patios. The architectural plans of the proposed building do not demonstrate access to private balconies for the replacement rental dwelling units. The applicant is to confirm whether the replacement rental dwelling units will have private balconies.

Response:

The proposed rental replacement units will have access to private balconies for all eligible-tenant units and where possible for post-application tenant units.

We trust that this is sufficient for your purposes of review and further processing of the RHDC application. If you have any questions or require additional information, please do not hesitate to contact the undersigned at ext. 2100.

Yours truly,

GOLDBERG GROUP



Michael Goldberg MCIP, RPP
Principal
cc. Tenblock