

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

HOUSING ISSUES REPORT

PROPOSED ZONING BY-LAW AMENDMENT AND RENTAL HOUSING DEMOLITION APPLICATIONS PROPOSED RESIDENTIAL APARTMENT BUILDING

48 Grenoble Drive
City of Toronto

Prepared for: **Tenblock**

March 2022

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1.0 Introduction

Goldberg Group has been retained by Tenblock to prepare a 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 northwest corner of Grenoble Drive and Deauville Lane, municipally known as 48 Grenoble Drive (“subject site”) (**Figure 1**). The proposal is to redevelop the subject site with two residential towers of 41- and 43-storeys with a shared 6-storey podium. A Rental Housing Demolition (RHD) application is being filed concurrently with a Zoning By-law Amendment (ZBA) application and Site Plan Approval (SPA) application, seeking authorization for the demolition of the existing building.

The subject site is currently occupied by a 9-storey residential building with a total site area of 6,749 sq. m (1.67 ac or 0.67 ha). The subject site is in close proximity to existing and planned transit infrastructure. The subject site is located approximately 650 m from the Aga Khan Park and Museum LRT Station, 750 m from the Science Centre LRT Station, expected to be operation in September 2022. In addition, the proposed Ontario Line, Flemingdon Park Station is located approximately 500 m from the subject site. The existing building contains a total of 109 existing residential dwelling units of rental tenure. The redevelopment proposal includes a total of 993 dwelling units, contained within the 41 and 43 storey towers and podium building. Of the proposed units, a total of 109 rental replacement units are included, which represents full replacement of existing dwelling units in accordance with the City’s housing policies. The proposed redevelopment will be integrated with the surrounding area context and provide overall enhancement to the public realm at this 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 109 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.

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

- Of the 109 rental dwelling units to be demolished, 75 of these dwelling units fall within the “affordable rent” category and 26 dwelling unit falls within the “mid-range” category. There are no existing dwelling units classified in the “high-end” category. Six (6) units are currently vacant, and two (2) units are occupied subject to an employment agreement and are not tenancies. The existing 109 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, secure bike storage areas, and a POPS;
 - A Public Consultation Strategy has been prepared by Bousfields Inc. and further details the strategy and means to facilitate tenant communication and the broader surrounding community as the applications are processed.
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2.0 Location and Description of the Subject Site

The subject site is located on the northwest corner of Grenoble Drive and Deauville Lane (**Figure 1**). The subject site is legally described as Part of Block G2 Registered Plan M-834 City of Toronto.

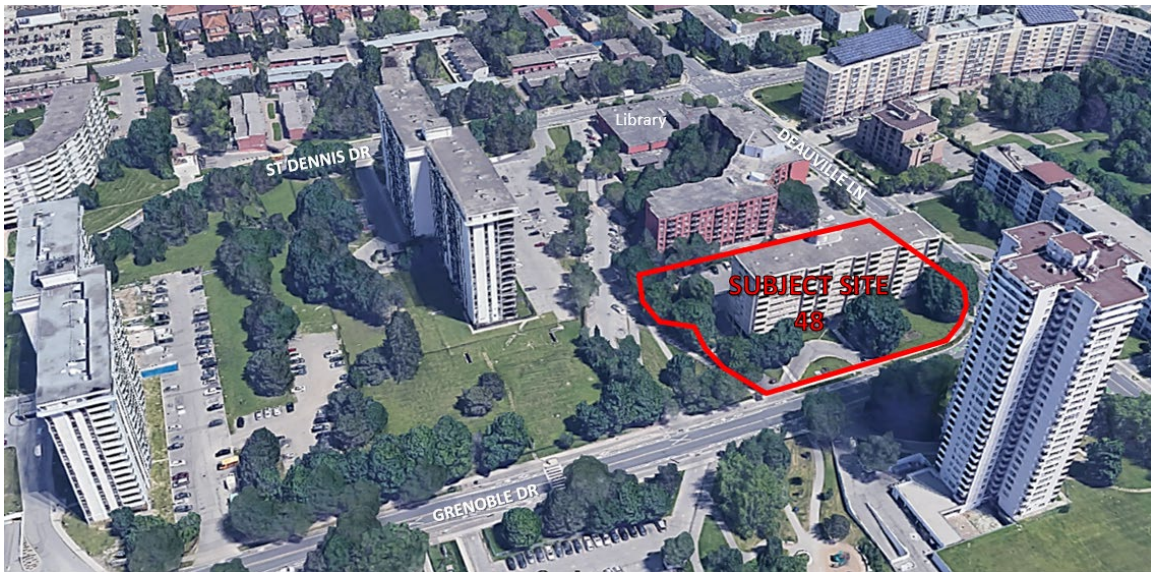


Figure 1 – Location of Subject Site

The subject site is an irregularly shaped parcel that is approximately 6,749 sq. m (1.67 ac or 0.67 ha) in size. The subject site has approximately 85 m of frontage on Grenoble Drive and approximately 60 m of frontage on Deauville Lane. Existing vehicular parking is located in one level of surface parking, accessible from a driveway at the northeastern limit of the Deauville Lane frontage, and in one level of underground parking, accessible from a driveway at the western limit of the Grenoble Drive frontage. The primary entrance of the building is located along Grenoble Drive where there is an existing circular driveway that provides pick-up/drop-off functions for residents and visitors to the building. The existing building provides a large passive green space along the Grenoble frontage, however there is currently no formal on-site common outdoor/indoor amenity areas for the use of residents.

The subject site is within close proximity to several near completed and planned transit stations. The site is approximately 650 m from the Aga Khan Park and Museum LRT Station, 750 m from the Science Centre LRT Station along the Eglinton Crosstown LRT

line, which is expected to be operation in September 2022. In addition, the site is approximately 500 m from the planned Flemington Park Station, along the Ontario Line. This location places the subject site in a Major Transit Station Area (MTSA) that is in close proximity to rapid transit infrastructure supported by proposed intensification of this site. Surface transit routes are currently operational along the major arterials and the internal local road network, surrounding the subject site.

3.0 Description of Existing Building & Rent Classification

3.1 Existing Building and Rental Units

The existing 9-storey residential building contains a total of 109 dwelling units, which consists of 50 one-bedroom units and 59 two-bedroom units. As of March 1, 2022, a total of 103 dwelling units are occupied and six (6) are currently vacant. Two (2) of the occupied units are subject to an employment agreement and are not rental tenancies.

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

Table 1 – Average Rental Unit Size (m²/sf)

Unit Type	No. of Units	Average Size* (m ²)	Average Size* (ft ²)
1-Bedroom	50	62 m ²	672 ft ²
2-Bedroom	59	88 m ²	943 ft ²

* Due to the pandemic, access to existing ground floor units was limited. These measurements will be more accurately measured by the owner at the earliest opportunity and provided to Housing Staff upon availability.

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

There is currently a supply of 103 parking spaces, which includes 40 underground parking spaces and 63 surface parking spaces. As of March 1, 2022, 82 parking spaces are occupied by tenants. Parking is leased to tenants and paid in addition to monthly rent fees.

There is centralized heating in the existing building but no air conditioning. Dwelling units do not have in-suite thermostat controls. The existing building does not provide any

common indoor or outdoor amenity spaces for residential use. There are several picnic tables located in the grassed hillside beside the garbage area. The centralized laundry room on the ground floor contains eight (8) washing machines and six (6) dryers.

3.2 Rent Classification

Based on the March 1, 2022 rent roll, of the 109 existing rental units, 75 fall within the “affordable rent” category and 26 dwelling units fall within the “mid-range” category. There are no dwelling units classified in the “high-end” category. Within the unit mix, there are currently five (5) vacant one-bedroom dwelling units and one (1) vacant two-bedroom unit. Furthermore, there are two (2) units occupied subject to employment agreements that are not tenancies.

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 gas however, excludes parking, hydro, 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, subject to availability. 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 2022 City of Toronto / CMHC Rental Unit Thresholds as follows:

Table 2 – 2022 City of Toronto / CMHC Rental Unit Thresholds

Unit Type	Affordable Rent	Mid-Range Rent
1-Bedroom Apartment	\$1,446 or less	\$1,447 to \$2,168
2-Bedroom Apartment	\$1,703 or less	\$1,704 to \$2,554

A detailed rent roll containing information on each rental unit related to the number of bedrooms, floor area, monthly rent, and rent classification will be provided directly to Housing staff in a 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, 48 Grenoble Drive, March 1, 2022

UNIT TYPE	Affordable Units	Mid-Range Units	High-End Units	Total Occupied	Total Vacant	Total Units (#)
1-BEDROOM	33	12	0	45	5	50
2-BEDROOM	42	14	0	58*	1	59
TOTAL	75	26	0	103*	6	109

*Including two units occupied subject to employment agreements that are not tenancies

4.0 The Proposal & Rental Replacement

4.1 The Proposal

The proposal seeks to demolish the existing 9-storey residential apartment building to redevelop the subject site with a 41- and a 43-storey tower with a shared 6-storey podium building containing a total of 993 residential dwelling units. The proposal includes 109 rental replacement units and 884 new dwelling units. The 109 rental replacement units are distributed within the 6-storey podium and represents full rental replacement, in compliance with City policies and by-law requirements regarding rental replacement.

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 redevelopment 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 993 dwelling units and distributed as follows in Table 4:

Table 4 – Dwelling Unit Distribution

Unit Type	Rental Replacement	%	New Dwelling Units	%
1 Bedroom	50	46%	566	64%
2 Bedroom	59	54%	225	25%
3 Bedroom	0	0%	93	11%
TOTAL	109	100 %	884	100%
TOTAL COMBINED	993 (100%)			

- Separate residential lobbies are provided for each tower (West and East towers) and the podium building and shown on the Ground Floor Plan attached in **Appendix A**. The residential lobby for the west tower is located at the southwest corner of the subject site, addressing Grenoble Drive. The residential lobby for the podium is centrally located along the Grenoble Drive frontage. The residential lobby for the east tower is located at the southeast corner addressing Deauville Lane.
 - Within each 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, administrative offices, and servicing/loading areas and corridors.
 - A POPS is proposed along the Grenoble Drive frontage with an area of approximately 495 square metres. The POPS is designed with articulated hardscaping, high-quality landscaping, and seating areas.
 - An on-site parkland dedication of 676 square metres (10% of site area) is proposed along the west edge of the site, adjacent to publicly-owned lands with direct access to the existing Grenoble Park, and also adjacent to the approved future parkland dedication associated with the development of 25 St. Dennis Drive.
 - A total of 3,978 sq. m. of indoor and outdoor amenity space is provided on the lot. Both west and east towers and the podium building have indoor and outdoor amenity space allocated for each, at a rate of 2.0 sq. m. per dwelling unit. The amenity space is distributed as follows:
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	Podium Building (Rental Replacement)	West Tower (43 – Storey Tower)	East Tower (41 – Storey Tower)	TOTAL
Indoor Amenity	218 sq. m	920 sq. m	850 sq. m	1,988
Outdoor Amenity	220 sq. m	920 sq. m	850 sq. m	1,990
TOTAL	438 sq. m.	1,840 sq. m.	1,700 sq. m.	3,978

- Parking is accessed from a driveway at the northeastern corner of the Deauville Lane frontage. Four (4) levels of underground parking are proposed. A total of 522 parking spaces are proposed as follows: 471 spaces for residential use and 51 for visitor parking spaces.

4.2 Rental Replacement Units

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

- 50 one-bedroom units with an average size of approximately 59 m² (635 ft²); and
- 59 two-bedroom units with an average size of approximately 90 m² (965 ft²)

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.

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));
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- 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));
- 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.

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 that continues to evolve with new development that supports existing and planned transit infrastructure. The subject site is approximately 650 m from the Aga Khan Park and Museum LRT Station, 750 m from the Science Centre LRT Station, and 500 m from the planned Flemington Park Ontario Line Station. The proposal satisfies many of the PPS and Growth Plan policy objectives. In particular, the subject site's proximity to transit stations and other modes of active transportation, such as walking and cycling, contributing 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, schools, 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 well-served by transit.

From a Growth Plan perspective, the increased number, broadened range, and greater choice of housing, together with proximity to existing and planned transit stations 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.

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 the 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:
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- 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.

The existing 109 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 ²)	Average Proposed Size (m ²)	Average Existing Size* (ft ²)	Average Proposed Size (ft ²)	% Change in Average Unit Sizes
1-Bedroom	50	62 m ²	59 m ²	672 ft ²	635 ft ²	-5.5%
2-Bedroom	59	88 m ²	90 m ²	943 ft ²	965 ft ²	+2.3%

* Due to the pandemic, access to existing ground floor units is limited. These measurements will be more accurately measured by the owner at the earliest opportunity and provided to Housing Staff upon availability.

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 POPS, parkland dedication, indoor and outdoor amenity areas, 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.

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.

5.3 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, and the City Official Plan, specifically Policy 3.2.1.6(b). The proposal provides for additional housing, on a subject site that is located in an area evolving with new development, in very 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. 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 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) is 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 PLAN