

March 29, 2019

Jym Clark, Planner
Strategic Initiatives, Policy & Analysis
Metro Hall
55 John Street, 22nd Floor
Toronto, ON, M5V 3C6

Dear Mr. Clark:

Re: *Housing Issues Report Addendum Letter*
Application No. 18 135369 STE 27 OZ; 18 135372 STE 27 SA;
18 135378 STE 27 RH
11-25 Yorkville Avenue and 16-18 Cumberland Street

Overview

This addendum letter is provided in support of an Official Plan Amendment and rezoning application, and Rental Housing Demolition & Conversion application by 11 Yorkville Partners Inc. (the “applicant”) for the lands located on the south side of Yorkville Avenue, west of Yonge Street, municipally known as 11-25 Yorkville Avenue and 16-18 Cumberland Street (“the subject site”). This addendum letter serves as an update to the analysis provided in our March 2018 Housing Issues Report, which was an appended report to our March 2018 Planning and Urban Design Rationale report, and our Housing Issues Addendum Letter, filed in December 2018.

The subject site contains a total of 81 residential rental units, provided in four buildings (11, 17, 19 and 21 Yorkville Avenue). In total, the site contains 54 bachelor and 25 one-bedroom units, as well as 1 two-bedroom unit and 1-three bedroom unit. The development application seeks to demolish and replace the existing 81 rental units with similar sized unit types, and provide an increase in overall rental replacement gross floor area (GFA).

Since the last resubmission of the application was filed in December 2018, minor changes were made to the proposal as the building floorplates were further refined (see **Table 1** below). As a result, the rental replacement strategy has been modified as follows:

- A further increase in the total rental replacement gross floor area (+91 square metres);
- A reduction in the number of bachelor and three-bedroom replacement units; and
- An increase in the number of one- and two-bedroom rental replacement units.

Table 1: Proposed Rental Replacement

Unit Type	December 2018	March 2019	Change
Bachelor	22 units	17 units	- 5 units
1-bedroom	35 units	45 units	+ 10 units
2-bedroom	7 units	12 units	+ 5 units
3-bedroom	17 units	7 units	- 10 units
Total Units	81 units	81 units	No Change
Total GFA	49,221 ft²	49,312 ft²	+ 91 ft²

The following addendum letter will provide an overview of the changes made to the rental replacement proposal. It continues to be our opinion that the proposed development conforms to the policy and regulatory framework that governs rental replacement in the City of Toronto.

Analysis and Opinion

It continues to be our opinion that the revised proposal meets the requirements set out in Section 111 of the City of Toronto Act and Chapter 667 of the Municipal Code, as well as the intent of the applicable housing policies in Section 3.2.1 of the Official Plan. In particular, the proposal continues to conform to Policy 3.2.1(6)(b)(i) of the Official Plan, which requires planning approvals to secure “*at least the same number, size and type of rental housing units*” and replace and maintain “*with rents similar to those in effect at the time the redevelopment application is made*”.

In terms of total gross floor area, the proposed replacement continues to exceed what is currently provided on the subject site. A total rental replacement gross floor area of approximately 49,312 square feet is provided in the revised proposal, which is approximately 157.1 square feet more than what currently exists, and 91 square feet more than the December 2018 submission. A summary of the proposed GFA has been summarized in **Table 2** below:

Table 2: Total Gross Floor Area Replacement

	March 2018	December 2018 ¹	March 2019
Proposed GFA	42,390 ft ²	49,221 ft ²	49,312 ft ²
Existing Site GFA	42,490 ft ²	49,154.9 ft ²	49,154.9 ft ²
Difference	+100 ft ²	+66.1 ft ²	+157.1 ft ²

With respect to the number of replacement units, the proposal continues to provide 81 rental replacement units within the tower portion of the mixed-use building, on Floors 5 through 9. The proposed development maintains the approach to replace the majority of the existing bachelor and one-bedroom units with larger unit types (i.e. one-, two- and three-bedroom units). As such, the number of three-bedroom units was reduced to increase the number of one- and two-bedroom replacement options for returning tenants, many of which are currently in bachelor units (see **Table 3**). It continues to be our opinion that the proposed unit mix will diversify the number of unit types available to returning tenants.

Table 3: Comparison of Existing and Proposed Rental Replacement Units & Unit Type

Unit Type	Existing Units	Proposed Replacement		Change
		December 2018	March 2019	
Bachelor	54	(22) Bachelor units (32) 1-bedroom units	(17) Bachelor units (37) 1-bedroom units	(-5) Bachelor units (+5) 1-bedroom units
1-bedroom	25	(3) 1-bedroom units (7) 2-bedroom units (15) 3-bedroom units	(8) 1-bedroom units (12) 2-bedroom units (5) 3-bedroom units	(+5) 1-bedroom units (+5) 2-bedroom units (-10) 3-bedroom units
2-bedroom	1	(1) 3-bedroom unit	(1) 3-bedroom unit	No Change
3-bedroom	1	(1) 3-bedroom unit	(1) 3-bedroom unit	No Change
Total	81	81 Units	81 Units	No Change

In terms of unit size, the revised proposal continues to provide a broad range of unit sizes that are more reflective of the existing units in 11 Yorkville Avenue rather than the larger non-convictional units in 17-21 Yorkville Avenue (see **Table 4**).

¹ As per our December 2018 Addendum Letter, the size of existing units were updated with the surveyed 'Tarion Area'. It remains the intent of the applicant to replace the existing Tarion Area (as reflected in the updated surveys) with Tarion Area in the new building.

Table 4: Proposed Rental Replacement, Average Unit Size

Unit Type	Existing Units	Proposed Replacement		Change
		December 2018	March 2019	
Bachelor	430.9 ft ²	422.5 ft ²	441.8 ft ²	+19.3 ft²
1-bedroom	893.8 ft ²	550.6 ft ²	566.6 ft ²	+16.0 ft²
2-bedroom	1,022 ft ²	703.4 ft ²	785.9 ft ²	+82.5 ft²
3-bedroom	2,520.9 ft ²	925.3 ft ²	982.0 ft ²	+56.7 ft²

While the units provided in the development continue to be slightly smaller than what exists today (in terms of square feet), with the exception of the bachelor units, it continues to be our opinion that this approach is appropriate for the subject site. The replacement GFA continues to be reallocated among the replacement units to allow for larger units (on average) for the bachelor and one-bedroom units, which are the predominant unit types on the subject site.

We trust the foregoing is sufficient for your purposes. Should you require any additional information or clarification, please do not hesitate to contact me or Claire Ricker of our office at (416) 947-9744.

Yours truly,
Bousfields Inc.



David Huynh, MCIP, RPP

cc: *Kristy Shortall, 11 Yorkville Partners Inc.*