



May 1, 2018

Project No. 16154-1

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and

City Clerk c/o Nancy Martins,
Administrator, Planning and Growth Management Committee
City Hall, 10th Floor West
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**Re: *Midtown in Focus: Proposed Yonge-Eglinton Secondary Plan Update
Notice of Open House and Notice of Special Public Meeting
265 Balliol Street
Artmico Holdings G.P. Inc.***

We are the planning consultants for Artmico Holdings G.P. Inc. (the "Owner"), the owner of the property municipally known as 265 Balliol Street, in the City of Toronto (the "subject site"). Park Property Management Inc. (through a number of related companies, including the Owner) is a significant provider of rental housing in the City, as it owns and/or manages approximately 6,500 purpose built rental housing units. Two of its properties in the City of Toronto, located at 100 Spadina Avenue and 66 Isabella Street, properties on which there were existing apartment buildings, have recently been very successfully "intensified" through the construction of two new purpose built rental apartment buildings, resulting not only in improvements for existing tenants but also the addition of approximately 300 rental apartment units.

On behalf of the Owner, we are writing to express concern with the draft Yonge-Eglinton Secondary Plan Update, dated November 2017, (the "Draft Secondary Plan") which was presented to the public at an Open House on February 10, 2018, and which is scheduled to be considered by the Planning and Growth Management Committee prior to the summer recess in July 2018.

The subject site, which is designated *Apartment Neighbourhood*, has an existing 26 storey rental apartment building and seven rental townhouses on-site. On June 8, 2017, the Owner and its consultants met with the City Planning Department to discuss how best to optimize the development of the subject site through the provision of a new purpose built rental apartment building. Preliminary concepts for its development were presented. A meeting was then held with the tenants on July 19, 2017 to present the concepts. A meeting with the Councillor was held on August 1, 2017, to discuss the proposed application and to help identify priority community needs. The Owner filed a zoning by-law amendment application which provides for the replacement of the seven high end rental townhouses with a second rental apartment building (the "Application") on August 28, 2017.

Subsequently, on October 24, 2017, the Owner and its consultants met with City Planning staff (Housing), in order to identify any concerns with respect to the protection of the existing rental residential units. Importantly, the Application will both maintain all the existing rental housing units, (including the replacement of the seven high end rental townhouse units) and will introduce approximately 260 new purpose built rental dwelling units, making an important contribution to the available supply of purpose built rental housing in the City. As with 100 Spadina and 66 Isabella, the Application will result in improvements to existing facilities and amenities for residents of the retained rental housing units.

In December 2017, a Preliminary Report on the application was prepared which was considered by Community Council in January 2018. The Owner and its consultants then met with the City Planning Department on February 23, 2017 to discuss the comments received from City staff and summarized in the Preliminary Report. No revisions were made to the Application, pending the holding of the community meeting authorized by Council, which was held on April 10, 2018 with City staff and Councillor Matlow in attendance. An appeal of the Application was filed prior to April 3, 2018 and the proclamation of Bill 139.

The Owner is concerned that the policies of the Draft Secondary Plan ("the Plan") are too restrictive. They do not provide for an appropriate balancing of the objectives reflected in the City's Official Plan and, in our opinion, are not consistent with the Provincial Policy Statement ("the PPS") or the Growth Plan for the Greater Golden Horseshoe ("the Growth Plan").

Both the provincial documents promote intensification and compact building form, particularly in areas well served by public transit and support the provision of rental

housing. It would appear that the provisions of the Plan would have an opposite effect.

For example, Policy 3.3.5 of the Plan provides that "Tall buildings will only be permitted on sites and/or areas specifically identified as having tall building development potential or on infill development potential on Maps 21-5 to 21-7...." Map 21-6 identifies the subject site as being located in an area where there is **no potential** for tall buildings or infill. The appropriate form of development for the subject site appears to have been predetermined without a sound rationale. This approach does not provide the City with the opportunity to consider proposals for additional tall buildings, such as proposed in the Application, which may be acceptable from a built form perspective given the specific context.

The plan also includes new policies with respect to built form and massing (floor plate sizes, separation distances, step-backs, setbacks and podium heights). While in some circumstances these may be merited, in this instance the prescriptive nature of the standards limits the ability of the Owner to create a built form which is appropriate to their special circumstances.

Because of the commitment of the Owner to construct purpose built rental housing, the restriction on the provision of additional units on the subject site also negatively impacts the ability of the City to achieve its affordable and rental housing targets. When this restriction is coupled with the requirement that all new housing (rental or ownership, affordable or market) must attain a certain ratio of two and three bedroom units, and that there be minimum unit sizes, the opportunity to create affordable units, or simply "market" affordable units is further curtailed.

Finally, the provisions of proposed Policy 5.3.5, which provides that the amount of a monetary Section 37 contribution is to be equal to 25% of the incremental market value of the gross floor area, is inappropriate as it will discourage the provision of much needed purpose built rental and affordable rental as well as the achievement of other important City objectives such as the improvement of amenities and facilities for existing residents.

We look forward to further discussions on this matter during the consultation period with respect to the aforementioned concerns and other matters contained in the Draft Secondary Plan.



Please provide us with notice of decisions by Council or of the Planning and Growth Management Committee related to this matter.

Yours very truly,
Bousfields Inc.

A handwritten signature in black ink that reads "Lindsay Dale-Harris". The signature is written in a cursive, flowing style.

Lindsay, Dale-Harris, FCIP, RPP

cc. Gerd Wengler, Artmico Holdings G.P. Inc.