

July 4, 2018

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**VIA E-MAIL (pgmc@toronto.ca)**

File 06808.00001

The Planning and Growth Management Committee  
c/o Nancy Martin, Administrator  
City Hall, 10<sup>th</sup> Floor West  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Chair and Members of the Committee:

**Re: Midtown in Focus: Proposed Yonge-Eglinton Secondary Plan  
700-730 Mount Pleasant Road, 214-226 Soudan Avenue and 19-21 Brownlow  
Avenue, Toronto, PG 30.4**

On June 6<sup>th</sup>, we wrote to the Committee on behalf of our client Briton House Retirement Centre commenting upon the proposed Official Plan 405 for the Midtown Yonge-Eglinton area and **"requesting that the Committee introduce a resolution directing a Site .....Specific Policy for the Briton House Retirement Centre and related expansion."**

We would like to add some additional information in support of this request for enactment of a Site Specific Policy for the consideration of the Members of the Committee. Such a Policy would allow Briton House to continue to process its application which will ultimately provide housing which will alleviate the acute need for Senior's Housing. The current waiting list for a place at Briton House is currently 18 months, which confirms the obvious need to provide additional places for seniors in the surrounding area.

In the most recent CMHC Seniors Housing Report CMHC states:

"The overall vacancy rate in Ontario reached the lowest level since 2001 as demand for seniors' housing has outpaced supply. Vacancy rates dropped in more than half of the major census divisions in Ontario in 2017. Many markets showed signs of pent-up demand due to greater demand growth than growth in supply in the recent past, as well as a lack of new supply in the pipeline (completed in 2016 or under construction). Market activities varied even within the same group. In some markets where there is pent-up demand (Northumberland, Toronto, York, Brant, Frontenac, Leeds & Grenville, Lennox &

Addington, Prescott & Russell, Renfrew, Bruce, Essex, Grey, Chatham-Kent, Lambton, Oxford, and Perth), there is very low or even no new supply in the pipeline". (p.3, underlining added)

The Province's Policy with respect to provision of Senior's Housing states:

*"Healthy, liveable and safe communities are sustained by accommodating an appropriate range and mix of residential (including second units, affordable housing, **and housing for older persons**)...and other uses to meet long-term needs."*

Provincial Policy Statement, Section 1.1.1

The City's Policy with respect to provision of Senior's Housing states:

*"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."*

Toronto Official Plan, Section 3.2.1

Mr. Mark Conroy of the N. Barry Lyons Consultants Limited firm prepared a marketing assessment report for Briton House. In that report, he sets out a number of observations which address the issue of need for Senior's Housing in this area and confirm the fact that the housing proposed by Briton House will "help add new supply and diversify the mix of seniors housing .....in ....the local area."

"While addressing a growing market gap, the development proposal for new seniors-oriented condominium apartment units on the subject site helps address the broader planning policy goals of both the Province and the City of Toronto. The existing provincial and municipal planning policy encourages a mix of housing to meet the current and future needs of residents. This includes a mix of housing types, tenures, and a mix of market and affordable housing. As the population in the local area, and wider City of Toronto, continues to age, the need for new and diverse forms of seniors-oriented housing is likely to continue to grow."

In the absence of creating new housing options, the majority of seniors will stay within their homes. From a planning perspective, the prolonged occupation of these homes, as a result of the lack of attractive alternatives, limits the housing choices for younger generations who are more likely to need a larger home. Delaying the shift in housing due to supply side issues also creates negative community impacts in terms of reduced demand for local school facilities, transit,

and other amenities designed for the larger households that typically occupy these homes.

The proposal for the Briton House expansion would help add new supply and diversify the mix of seniors housing options in both the local area, and as part of the existing Briton House, offering residents the opportunity to retain ownership of a unit rather than renting like in the current Briton House retirement facility.

The proposed development would provide senior aged buyers with an attractive and unique alternative to the condominium and rental apartment towers that have become typical for the local area. The project would be tailored directly to the needs and characteristics of aging Boomers. Importantly, it offers the opportunity to transition to higher levels of care, as needs dictate, with minimal disruption. The physical connection to the Briton House, in addition to the presence of assisted living units in the podium of the new building (albeit physically separated) makes the development different from a typical condominium apartment building.

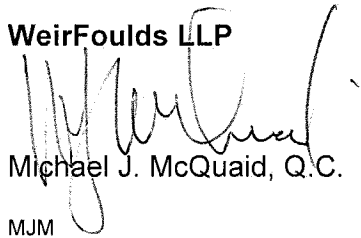
The expansion adds to the continuum of care already offered at Briton House providing an additional layer to the graduated housing already provided with independent living, assisted living, and memory care options. Residents in the new condominium apartment building would not only be able to access some of the services at the existing facility, but could potentially transition to other types of care as they continue to age and become increasingly vulnerable. The Amica at City Centre project proved that there is a pool of buyers who will consciously make their purchasing decision based on the option of graduating to a neighbouring retirement facility in the future.

Given the aging population in Toronto and the local area, the proposal for the subject site meets an emerging need. While seniors-oriented housing is not a new concept, the Toronto market is generally lacking in terms of the variety of options available. The proposed development diversifies the housing mix in the local area and would aid in addressing the need for seniors-oriented housing in a way that a typical condominium apartment cannot." (Underlining added.)

Accordingly, we ask that the Committee introduce a resolution **directing a Site and Area Specific Policy for the Briton House Retirement Centre and related expansion be prepares and direct that the proposed OPA should be referred back to staff for further consideration, both with respect to the proposed process intended to be followed and with respect to the substance and planning merits of the policy direction provided in the proposed Secondary Plan as it affects the Briton House expansion site.**

Yours very truly,

**WeirFoulds LLP**

A handwritten signature in black ink, appearing to read 'Michael J. McQuaid', written over the printed name.

Michael J. McQuaid, Q.C.

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