

June 17, 2019

Our File No.: 000031

Via Email

Planning and Housing Committee
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Marilyn Toft, Secretariat Contact

Dear Sirs/Mesdames:

**Re: Item PH6.1 – Final Recommendation Report
Official Plan Amendment – Policies to Address the Loss of Dwelling Rooms**

We are solicitors for Knightstone Capital Management Inc. (“**KCMI**”). KCMI is involved in the construction and operation of numerous student residences across the City of Toronto, in partnership with various post-secondary institutions including the University of Toronto, Ryerson University and Centennial College.

We are writing to express our client’s concerns with the proposed official plan amendment in respect of dwelling rooms (the “**Draft OPA**”). Our client’s particular concern, which would apply on a City-wide basis, is that the Draft OPA’s proposed definition of “dwelling room” will have unintended consequences by including all student residences within the scope of the Draft OPA.

KCMI understands the City’s desire to protect rental housing in the City of Toronto and, in particular, this particular form of rental housing. However, as currently drafted, the proposed definition of “dwelling room” would capture units provided in a student residence. While the staff report suggests that the Draft OPA would exempt such facilities through rent levels, we do not agree that this is the appropriate policy mechanism for addressing our client’s concern or the similar concern raised by the University of Toronto.

At this time, KCMI cannot confirm that its student residences would exceed the Draft OPA’s definition of “dwelling room tier 2 mid-range rents”. Further, the resulting incentive would be for student residences to include less affordable units to ensure that the Draft OPA would not apply. In our client’s view, the more appropriate approach would be to revise the definition of dwelling room to exclude dwelling rooms in private academic accommodations, dwelling rooms in a building owned by a post-secondary institution, and dwelling rooms in a building operated

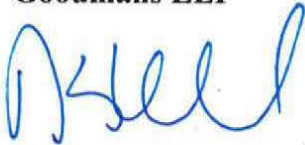
by, on behalf of, or in a manner similar to a post-secondary institution. This would be consistent with the City's explicit recognition that the Draft OPA is not intended to apply to student residences.

KCMI is prepared to work with the City to ensure that its concern is resolved in a timely basis because KCMI appreciates the City's desire to have the Draft OPA in force and effect as soon as possible.

Please also consider this letter as our client's request for notice of any decision in respect of this matter.

Yours truly,

Goodmans LLP



David Bronskill

DJB/

cc: Client

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