



City of Toronto Council
100 Queen Street West
Toronto ON M5H 2N2

Via Email: councilmeeting@toronto.ca

Attn: Sylwia Przezdziecki

Re: PH2.10 – City Solicitor Opinion – Bill 23, More Homes Built Faster Act, 2022 and Section 111 of the City of Toronto Act, 2006

Tenblock is a longstanding developer and owner of apartment buildings in Toronto. We currently have over 7,000 new apartments proposed in active development applications or concept development in Toronto, including over 600 rental replacement units. We develop both rental and condominium apartments.

This letter is written in support of maintaining the City of Toronto’s regulations on the demolition and conversion of rental properties. While there is room to standardize language, create greater transparency, and address redundancies, the core function of Section 111 is an important and necessary tool to maintain affordability in Toronto when redevelopment applications impact existing tenants.

It has been our experience that the rental replacement requirements of the City of Toronto are both fair and reasonable and generally not a noteworthy barrier to housing creation or project viability in circumstances where a significant increase in density is permitted. We have also effectively worked with City staff and local Councillors to exceed these standards and to find opportunities for additional affordable rental apartments as part of our applications where land use can be optimized. The redevelopment of Toronto’s aging apartment towers is a major undertaking for landholders, but it can be done in a way that improves communities and expands affordability while still supporting tenants’ rights to return to units of a similar size at a similar rent.

City Council should continue to support staff in their work to protect rental units and to ensure that Section 111 standards are included in any harmonizing legislation or modifications to the City of Toronto Act.

We would ask that we are provided with notice of any updates and future meetings in regard to the above noted matters and please do not hesitate to contact the undersigned if there are any questions.

Sincerely,
Tenblock

A handwritten signature in black ink that reads "Stephen Job".

Stephen Job, AICP
Vice President

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