

November 29, 2023

Our File No.: 210604

**Via Email: phc@toronto.ca**

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

**Attention: Nancy Martins**

Dear Sirs/Mesdames:

**Re: Item No. PH8.16 - Amendments to Toronto Municipal Code Chapter 667: Rental Demolition and Conversion By-law**

We are solicitors for Tenblock<sup>1</sup>, the owners of a number of properties in the City of Toronto (the “City”) where applications for official plan amendment, zoning by-law amendment, Site Plan Control and rental housing demolition have been approved or are currently in process. Most recently, rental housing demolition applications were approved by City Council for two Tenblock projects on the properties known municipally as:

- 25 St. Mary Street – Approved by City Council on May 10, 2023 (“**25 St. Mary**”); and
- 145 St. George – Approved by City Council on July 19, 2023 (“**145 St. George**”).

Tenblock participated in the January 2022 consultations with BILD and the City regarding the proposed centralized affordable housing access system and is generally supportive of the City’s efforts to update and clarify its Rental Demolition and Conservation By-law (“**Chapter 667**”). As a housing developer proposing to construct over 700 rental replacement units in the City, Tenblock takes a keen interest in ensuring that the revisions and updates to Chapter 667 are clear and that the proposed centralized affordable housing access system is effective.

**The Centralized Affordable Housing Access System:**

Tenblock is concerned that there remain a number of unresolved questions and issues related to the City’s proposed centralized affordable housing access system that were raised during the City’s consultation process that have yet to be resolved and necessitate further discussion.

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<sup>1</sup> Tenblock, including its owners and affiliated entities.



For example, Tenblock supports Councillor Saxe's request and rationale for placing post-application (i.e. non-eligible) tenants in a priority position to return to replacement units, subject to meeting income requirements. Importantly, this concept has already been incorporated into the recent rental demolition approvals for 25 St. Mary and 145 St. George. Should the City accept an alternative position, the concept of post-application priority would need to be permitted for these two approved projects to protect the existing post-application tenants.

In addition, it is also our client's understanding that mid-range rental replacement units (i.e. any above 100% of City AMR) without an eligible returning tenant would not be filled through the proposed centralized affordable housing access system and Chapter 667 should be amended accordingly. It would be a private responsibility to advertise these apartments widely and to income test applicants.

#### **Amendments to Municipal Code Chapter 667:**

While we appreciate that there are a number of needed and helpful updates to Chapter 667 proposed we would provide the following comments:

- **667-12.D.(3):** Although a tenant relocation and assistance plan is often required it is not always a requirement as there are often units that are vacant. This clause would benefit from the addition of "as applicable".
- **667-12.D.(4):** Although the removal of the specific language in this paragraph has streamlined the paragraph it has also made the clause too broad. This clause would benefit from a revision that would specify that the all restrictions and agreements noted relate to the noted condition of approval. For example: . . . "and that all restrictions and agreement **related to such a condition** shall be to the satisfaction of the Chief Planner and City Solicitor."
- **667-15 A.(3):** As noted above, we support the comments provided by Councillor Saxe in her November 27, 2023 comment letter and Tenblock has incorporated post-application tenant priority into its 25 St. Mary and 145 St. George rental demolition approvals. If an alternative concept is incorporated into Chapter 667, an exception would be required for these approvals to protect existing post-application tenants.

Our client appreciates the effort that has gone into the proposed centralized affordable housing access system process and the proposed revisions to Chapter 667. Tenblock has a special interest in ensuring that the rental replacement process functions appropriately and is committed to working with the City to successfully build and tenant rental replacement units in the City.

**Goodmans<sup>LLP</sup>**

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.

Yours truly,

**Goodmans LLP**



Anne Benedetti

AB/

cc: Councillor Saxe, University-Rosedale  
Counillor Moise, Toronto Centre  
Deanna Chorney, Manager Strategic Initiatives, Policy & Analysis  
Stephen Job, Tenblock

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