

April 3, 2024

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. PH 11.10 - Response to Including New Approval Conditions for Rental Demolition Applications**

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**”).

Both the 25 St. Mary and 145 St. George rental housing demolition approvals, that were negotiated with City Staff and the local Councillors in consultation with tenants, and approved by Council in the summer of 2023, provide income-eligible post-application tenants the option to rent available replacement affordable rental units prior to eligible individuals who are on the Centralized Affordable Rental Housing Access System (“**CARHAS**”). Should the City accept an alternative general position on this matter, the concept of post-application priority for income-eligible tenants would need to be continue to be honoured for these two approved projects to protect these existing approved arrangements and the income eligible post-application tenants in these buildings.

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



### **The Centralized Affordable Housing Access System:**

Tenblock participated in the January 2022 and 2023 consultations with BILD and the City regarding the proposed CARHAS. Further, on November 29, 2023, Tenblock provided comments to the Planning and Housing Committee and City Council on Item No. PH8.16 –“Amendments to Toronto Municipal Code Chapter 667: Rental Demolition and Conversion By-law”. A key matter raised in that correspondence, was Tenblock’s support of 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. This item is of specific concern to Tenblock as the concept of priority for these income eligible post-application tenants was incorporated into the 2023 rental demolition approvals for its 25 St. Mary and 145 St. George development projects and these arrangements should not be threatened.

Since Item PH8.16 was considered by Council in December of 2023, Tenblock has continued to participate in the consultations with BILD and the City regarding the proposed CARHAS including in the discussion of the appropriate priority for income eligible post-application tenants. Through these discussions, Tenblock has continued to raise, and Staff have been supportive of the fact that the existing 2023 rental housing demolition approvals for 25 St. Mary and 145 St. George require protection should the City accept an alternative general position on this item. The approved in place arrangements at both of these projects provide a priority position for post-application tenants to return to replacement units only when income requirements are met as was negotiated with the local Councillors, and City Staff, in consultation with tenants. The approved arrangements do not provide a blanket priority for post-application tenants to return to replacement units.

As a housing developer proposing to construct numerous 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 CARHAS is effective.

Our client appreciates the effort that has gone into the proposed CARHAS 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.

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**

A handwritten signature in blue ink, appearing to read "Anne Benedetti", with a long horizontal line extending to the right.

Anne Benedetti



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

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