

December 19, 2018

Jym Clark, Planner
Strategic Initiatives, Policy & Analysis
Metro Hall
55 John Street, 22nd Floor
Toronto, ON, M5V 3C6

Dear Mr. Clark:

Re: *Housing Issues Report Addendum Letter*
Application No. 18 135369 STE 27 OZ; 18 135372 STE 27 SA;
18 135378 STE 27 RH
11-25 Yorkville Avenue and 16-18 Cumberland Street

This addendum letter is provided in support of an Official Plan Amendment and rezoning application by 11 Yorkville Partners Inc. (the “applicant”) for the lands located on the south side of Yorkville Avenue, west of Yonge Street, municipally known as 11-25 Yorkville Avenue and 16-18 Cumberland Street (“the subject site”). This addendum letter serves as an update to the analysis provided in our Housing Issues Report, which was an appended report to our March 2018 Planning and Urban Design Rationale report. The Housing Issues Report was filed with the initial application on March, 27, 2018.

Concurrent to the Official Plan Amendment and rezoning application process, a Rental Housing Demolition and Conversion Application was submitted in March 2018 (Application No. 18 135378 STE 27 RH). The application seeks to demolish and replace the existing 81 rental units located in 11, 17, 19 and 21 Yorkville Avenue. The replacement strategy included in the initial submission proposed to replace the existing units with similar sized unit types, and to generally maintain the overall rental gross floor area (GFA). In recognizing the unique nature of the units in 17-21 Yorkville Avenue, some of the replacement units were proposed at a smaller square footage than the existing units.

Following the initial submission, the applicant and consulting team led a tenant consultation meeting for residents of 11-21 Yorkville Avenue on November 6, 2018. The purpose of the meeting was to provide residents with an overview of the Rental Housing Demolition and Conversion application process. The applicant, along with members of the consulting team and City Staff, answered questions, outlined next steps, and identified opportunities for tenant involvement moving forward.

Further to our discussions with your office, comments received from City Staff, as well as existing tenants, revisions have been made to the proposed mixed-use development and in turn, the rental replacement strategy. Since the original application was filed, minor changes were made to the proposal with respect to massing, tower floorplate size and separation distances. As a result, the rental replacement strategy has been modified from the original submission:

- An increase in the gross floor area for the rental replacement units;
- Providing additional rental replacement units on the 9th floor of the building; and
- An increase in the number of three-bedroom rental replacement units.

The following addendum letter will provide an overview of the changes made to the rental replacement proposal. It continues to be our opinion that the proposed development conforms to the policy and regulatory framework that governs rental replacement in the City of Toronto.

Existing Residential Rental Units

As identified in our Housing Issues Report (March 2018), a total of 81 residential rental units are provided within four buildings located on the subject site (11, 17, 19 and 21 Yorkville Avenue). In total, the site contains 54 bachelor and 25 one-bedroom units, as well as 1 two-bedroom unit and 1-three bedroom unit (see **Table 1** below).

Table 1: Existing Unit Typology

Unit Type	11 Yorkville	17 Yorkville	19 Yorkville	21 Yorkville	Total
Bachelor	54	0	0	0	54
1-bedroom	16	1	2	6	25
2-bedroom	1 ¹	0	0	0	1
3-bedroom	0	1	0	0	1
Total Units	71	2	2	6	81

The building at 11 Yorkville Avenue is comprised of market rental units, which were converted from the original mixed-use building that contained some office uses, which was later converted to a hotel and then finally to a rental building, making the sizing of the converted units very unique. Those within 17, 19 and 21 Yorkville Avenue were created as part of, or after, the original commercial buildings were built. As illustrated by **Table 1** above, the units in 11 Yorkville Avenue are largely made up of bachelor (76%),

¹ The two-bedroom unit located in 11 Yorkville Avenue was previously two units (a bachelor and one-bedroom), and was later renovated to create a new 2-bedroom unit for the on-site superintendent.

and one-bedroom units (22.5%). The predominant mix of bachelor and one-bedroom units is a result of the conversion of hotel rooms to rental units. Based on the revised surveys, which are discussed later in the addendum, the unit size ranges between approximately 360 - 500 square feet for bachelor units, and between 427 - 718 square feet for one-bedrooms. **Tables A.1 - A.4** in **Appendix A** provide a detailed summary of the existing units on the subject site.

In comparison, the units located in 17-21 Yorkville Avenue, are by-products of internal renovations and retrofits. The existing rental units were created after the commercial buildings were constructed and as such, exhibit unconventional unit sizes and layouts. The one-bedroom units within 17-21 Yorkville Avenue range between approximately 980 - 1,944 square feet, and the three-bedroom unit was surveyed at approximately 2,546 square feet (see **Appendix A**). When compared to the size of units within 11 Yorkville Avenue, a building with purpose-built rental units, the size of these units are unique and are atypical from the more conventional unit layouts in the purpose-built rental building at 11 Yorkville Avenue.

Proposed Development

March 2018 Proposal

The initial redevelopment scheme proposed two buildings on the subject site; a 62-storey mixed-use building fronting onto Yorkville Avenue, and a second 2-storey retail building fronting onto Cumberland Street. The mixed-use building would contain a total of 716 residential units, of which 81 would be rental replacement. A total gross floor area of 563,938 square feet was proposed, 42,390 square feet of which would account for the rental replacement GFA (approximately 99.76% of what currently exists on-site). The proposal would replace the same number of rental units (81) with either the same or larger unit types. In terms of size, not all the existing units would be replicated in the new development.

Within the tower, the rental replacement units were located on the 5th – 8th floors, and utilized the residential lobby on the ground floor. All the tenants would have access to the common indoor and outdoor amenity spaces, as well as the proposed POPS and public park space.

Revised Rental Replacement Proposal

Since the application was filed, minor revisions were made to the proposed mixed-use development concept. Reductions in the podium and tower floor plates, as well as an increased separation distance to the developments to the east (1 Yorkville Avenue and

8 Cumberland Street)² resulted in a reduced GFA of 540,315 square feet and total unit count of 670.

The latest proposal includes an additional floor of rental replacement units, and a rental replacement GFA that now exceeds the amount currently on the subject site. Notwithstanding the introduction of an additional floor, the proposal continues to provide 81 replacement rental units within the tower portion. In general, with the additional GFA, the proposal has been able to replace a greater number of units with larger unit types and varying unit size options for returning tenants. A summary of proposed rental replacement units and GFA is outlined in **Table 2** below. Access to the units and amenity areas remain the same as what was originally proposed.

Table 2: Proposed Rental Replacement

Unit Type	March 2018 Submission	December 2018 Submission	Change
Bachelor	46	22	- 24
1-bedroom	27	35	+ 8
2-bedroom	4	7	+ 3
3-bedroom	4	17	+13
Total Units	81	81	81
Total GFA	42,390 ft²	49,221 ft²	-

Analysis and Opinion

In our opinion, the revised proposal continues to meet the requirements set out in Section 111 of the City of Toronto Act and Chapter 667 of the Municipal Code, as well as the intent of the applicable housing policies in Section 3.2.1 of the Official Plan. In particular, Policy 3.2.1(6)(b)(i) of the Official Plan requires that planning approvals shall secure that “at least the same number, size and type of rental housing units are replaced and maintained with rents similar to those in effect at the time the redevelopment application is made”.

Total Gross Floor Area Replacement

Since the original application was filed in March 2018, the surveys of the existing rental units were revised by WSP. As part of this update, the Gross Floor Area for each unit was re-calculated using ‘Tarion Area’, which is the total area for each floor measured as the area bound by the centre lines of demising or party walls separating abutting units, the exterior surface of all exterior walls, and the exterior surface of the corridor wall

² The full development address for the project for “8 Cumberland Street” is 826-834 Yonge Street and 2-8 Cumberland Street.

enclosing and abutting the unit. The applicant intends to replace the existing Tarion Area (as reflected in the updated surveys) with Tarion Area in the new building. A summary of the existing unit mix and GFA has been summarized in **Table 3** below, and the updated surveys are provided under separate cover.

Table 3: Existing Gross Floor Area

	11 Yorkville	17 Yorkville	19 Yorkville	21 Yorkville
Total Units	71	2	2	6
Total GFA*	35,041.8 ft ²	4,373.1 ft ²	3,054.7 ft ²	6,731.3 ft ²
Site GFA	49,200.9 ft ²			

* Tarion Area (square feet) based on updated WSP surveys

In terms of total gross floor area, the proposed replacement exceeds what is currently provided on the subject site. A total rental replacement gross floor area of approximately 49,221 square feet is provided in the revised proposal, which is approximately 20.1 square feet more than what currently exists.

Unit Number and Type

The proposed number of rental replacement units (81 units) continues to meet the number of existing rental units on the subject site (81 units). In terms of unit type, the revised proposal contemplates replacing the majority of the existing bachelor and one-bedroom units with larger unit types (i.e. one-, two- and three-bedroom units). As compared to the previous proposal, there is notably more three-bedroom units (see **Table 4**). In our opinion, this will further diversify the number of unit types available to returning tenants, and number of family-sized units available for the general market.

Table 4: Comparison of Existing and Proposed Rental Replacement Units & Unit Type

Unit Type	Existing	Proposed Replacement	
		March 2018 Submission	December 2018 Submission
Bachelor	54	Forty-six (46) Bachelor units Eight (8) 1-bedroom Units	Twenty-two (22) Bachelor units Thirty-two (32) 1-bedroom units
1-bedroom	25	Nineteen (19) 1-bedroom units Three (3) 2-bedroom units Three (3) 3-bedroom units	Three (3) 1-bedroom units Seven (7) 2-bedroom units Fifteen (15) 3-bedroom units
2-bedroom	1	One (1) 2-bedroom unit	One (1) 3-bedroom unit
3-bedroom	1	One (1) 3-bedroom unit	One (1) 3-bedroom unit
Total	81 Units	81 Units	81 Units

Unit Size

In terms of unit size, the revised proposal provides for a broad range of unit sizes that are more reflective of the units within 11 Yorkville Avenue, rather than the larger non-convectional units in 17-21 Yorkville Avenue. The range of replacement unit sizes are outlined below:

- Bachelor replacement units: 350 sq. ft – 658 sq. ft
- One-bedroom replacement units: 511 sq. ft – 1,024 sq. ft
- Two-bedroom replacement units: 933 sq. ft – 933 sq. ft
- Three-bedroom replacement units: 1,024 sq. ft – 1,024 sq. ft

From an average size perspective, the replacement units for the existing bachelor units are generally larger, however, the average size of the rental replacement units for the other unit types are generally smaller than what currently exists (see **Table 5**). In our opinion, this approach remains appropriate as the existing average unit sizes are considerably skewed by the units in 17-21 Yorkville Avenue, which are significantly larger given the unique circumstance.

As outlined in **Appendix A**, the one-bedroom units within 17-21 Yorkville Avenue range from approximately 980 to 1,944 square feet in size, and the only three-bedroom unit was surveyed at approximately 2,546 square feet. When compared to the range for one-bedroom units in 11 Yorkville Avenue (approximately 427 - 718 square feet), it is clear that those within 17-21 Yorkville Avenue are an anomaly. As previously mentioned, the units within 17-21 Yorkville Avenue are a product of internal renovations and retrofits, and were not originally intended as purpose-built residential units. These units were created after the commercial buildings were constructed, and do not share the same size proportions as those found in a typical purpose-built rental building. It continues to be our opinion that the proposed replacement units are appropriate given that the size and layouts of some of the existing units are not replicable in a modern redevelopment project.

Table 5: Proposed Rental Replacement, Average Unit Size

Unit Type	Existing		Proposed		
	# of Units	Average Size	# of Units	Replacement Type	Average Size ³
Bachelor	54	430.9 ft ²	54	22 bachelor 32 one-bedroom	479.5 ft ²

³ The average size column represented a weighted average based on the composition of the replacement units

1-bedroom	25	894.6 ft ²	25	<i>3 one-bedroom 7 two-bedroom 15 three-bedroom</i>	868 ft ²
2-bedroom	1	1,022 ft ²	1	<i>1 three-bedroom</i>	933 ft ²
3-bedroom	1	2,546.3 ft ²	1	<i>1 three-bedroom</i>	1,024 ft ²

Notwithstanding that the revised proposal is generally providing smaller units than what exists today (in terms of square feet) for the larger non-conventional units in 17-21 Yorkville Avenue, it is our opinion that this approach is appropriate as the difference in GFA has been more appropriately reallocated to the balance of the rental replacement units, which creates larger replacement units (on average) for the bachelor and one-bedroom units, which are the predominant unit types on the subject site. As result, the majority of returning tenants will have a greater opportunity to return to a larger unit, both in terms of type and size. Furthermore, the proposed sizes of the replacement units for the atypical larger units are still appropriately sized and are more in line with the sizes of the same respective unit type found in purpose-built rental buildings.

Tenant Relocation and Assistance Plan

Given the stage of the application, the details to satisfy Policy 3.2.1(b)(iii), related to the tenant relocation and assistance plan, have not yet confirmed. The tenant relocation and assistance plan will also be developed in collaboration with your office, including a communication strategy to tenants for the remainder of the development application process.

We trust the foregoing is sufficient for your purposes. Should you require any additional information or clarification, please do not hesitate to contact me or Claire Ricker of our office at (416) 947-9744.

Yours truly,
Bousfields Inc.



David Huynh, MCIP, RPP

cc: Kristy Shortall, 11 Yorkville Partners Inc.

APPENDIX A

Existing Residential Buildings, Unit Size and Type

Table A.1 – 11 Yorkville Avenue

11 YORKVILLE AVENUE					
Unit Type	# of Units	Average Size	Smallest Unit	Largest Unit	Median
Bachelor	54	430.9	360.3	500.8	403.9
1-bedroom	16	692.6	427.1	718.2	687.35
2-bedroom	1	1,022	1,022	1,022	1,022
3-bedroom	0	0	0	0	0

Total Units	71
Total GFA	3,5041.8

Table A.2 – 17 Yorkville Avenue

17 YORKVILLE AVENUE					
Unit Type	# of Units	Average Size	Smallest Unit	Largest Unit	Median
Bachelor	0	0	0	0	0
1-bedroom	1	1,826.8	1,826.8	1,826.8	1,826.8
2-bedroom	0	0	0	0	0
3-bedroom	1	2,546.3	2,546.3	2,546.3	2,546.3

Total units	2
Total GFA	4,373.1

Table A.3 – 19 Yorkville Avenue

19 YORKVILLE AVENUE					
Unit Type	# of Units	Average Size	Smallest Unit	Largest Unit	Median
Bachelor	0	0	0	0	0
1-bedroom	2	1,527.35	1,109.8	1,944.9	1,527.35
2-bedroom	0	0	0	0	0
3-bedroom	0	0	0	0	0

Total Units	2
Total GFA	3,054.7

Table A.4 – 21 Yorkville Avenue

21 YORKVILLE AVENUE					
Unit Type	# of Units	Average Size	Smallest Unit	Largest Unit	Median
Bachelor	0	0	0	0	0
1-bedroom	6	1,121.9	980.5	1,301.8	1,107.15
2-bedroom	0	0	0	0	0
3-bedroom	0	0	0	0	0

Total Units	6
Total GFA	6,731.3