

Appendix A



**Housing
Issues
Report**

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1 Introduction

This Housing Issues Report ("Report") has been prepared in support of a Zoning By-law Amendment application by Fora Developments (the "Applicant") to amend the City-wide Zoning By-law 569-2013, as amended, and the former City of Toronto Zoning By-law 438-86, as amended, in order to permit the redevelopment of an approximate 1.1 hectare site located on the west side of Dundas Street West, north of Bloor Street West (referred to as the "subject site"). The subject site is municipally known as 2400 - 2440 Dundas Street West (see **Figure A1** – Aerial Photo).

On behalf of the Applicant, we are pleased to submit this Housing Issues Report, which address existing and emerging provincial and municipal housing policies, as well as the affordable housing direction set out in Site and Area Specific Policy ("SASP") 796 of Official Plan Amendment 591 ("OPA 591"), as adopted by City Council. At the time this Report was prepared, OPA 591 had not yet been approved by the Ministry of Municipal Affairs and Housing. In our opinion, the proposed development conforms with the relevant provincial and municipal policies governing new and affordable housing in the City of Toronto.



Figure A1 - Aerial Photo - Site Context

2 Subject Site

The subject site is currently occupied by two low-rise commercial buildings containing a Freshco grocery store, Enterprise car rental and a Shoppers Drug Mart pharmacy with office on the second floor. Central to the subject site is a large surface parking lot serving the existing buildings. East of the Freshco, at the southeast corner of the subject site adjacent to the CPR/CNR Rail Corridor, is an interim pick-up/drop-off area for the UP Express/Bloor GO Station. Immediately south of the pick-up/drop-off area is a secondary pedestrian entrance to the Station. This pick-up/drop-off area is served by an access easement which parallels the rail corridor and then, in the approximate centre of the subject site turns and extends westerly to provide a direct, signalized access to Dundas Street.

With respect to landscaping, the majority of the subject site is paved with a strip of vegetation and trees along the frontage of Dundas Street West.

3 Proposed Development

The application contemplates the redevelopment of the subject site with two mixed-use buildings containing a total of three towers ranging from heights between 18- to 36-storeys. Building A (north) contains two towers with heights of 18-storeys, or 71.1 metres including mechanical penthouse (Tower A1) and 25-storeys, or 92.7 metres, including mechanical penthouse (Tower A2), above a shared 3-storey podium. Building B (south) contains one tower with a height of 36-storeys, or 124.2 metres including mechanical penthouse above a 4-storey podium. The proposed development will have a total gross floor area of 58,900.2 square metres, including 54,227.9 square metres of new residential space and 4,672.4 square metres of non-residential space for retail, office, and commercial uses. The proposed development will have an overall density of 5.3 Floor Space Index (FSI). At grade, fronting onto Dundas Street West, an approximate 1,000 square metre Privately Owned Publicly Accessible Space (POPS)/Public Park is proposed. The POPS/Park is anticipated to include raised planters, trees and seating areas.

The proposed development will contain a total of 873 residential dwelling units, including 598 one-bedroom units (68.5%), 186 two-bedroom units (21.3%), and 89 three-bedroom units (10.2%). While the majority of the units in the development are located in Towers 1 to 3, the proposal will also provide 7 at-grade live-work units in the podium of Building A. The live-work units have been designed to accommodate the commercial or cultural uses at-grade, and residential accommodation on the second floor, within the mezzanine level of Building A. The primary entrance to the live-work units will be from a private walkway opposite the proposed POPS/Park, and a secondary entrance is located within the building from an internal corridor.

A summary of the proposed residential units, including the number of units and unit typology are included in **Table A1**.

Table A1 - Proposed Residential Units

Unit Type	Number of Units
One-bedroom	598 units (68.5%)
Two-bedroom	186 units (21.3%)
Three-bedroom	89 units (10.2%)
Total	873 units (100%)

The proposed development proposes 212 vehicle parking spaces, 989 bicycle parking spaces and 5 loading spaces. One level of underground parking is proposed to service both Buildings, and 4 short-term parking spaces are provided at-grade, on the north side of Building A. Access to the parking and servicing functions of the proposal will be from a new private road, extending east from Dundas Street West into the site, and aligning with Chelsea Avenue. A lay-by is proposed along the south side of the private street. A connection to the UP Express/Bloor GO Station pick-up and drop-off area would also be provided from the proposed private road.

With respect to amenity, the proposal provides approximately 2,423 square metres of indoor amenity and 1,069 square metres of outdoor amenity for a total of 4.0 square metres per unit. Adoor amenity areas will be located at-grade and on Level 2 for Building A, as well as Levels 2, 13 and 14 for Building B. An adjoining outdoor amenity area will be provided on Level 2 for Building A, and at at-grade, Levels 2 and 13 for Building B. In addition to the private outdoor amenity areas provided in the development, an approximate 1,000 square metre POPS/Park will be provided at-grade for use by residents and the local community.

4 Applicable Policy and Regulatory Framework

The following subsections highlight portions of the provincial and municipal policies and regulatory framework applicable to the subject site and the provision of housing. A more detailed summary of the relevant land use and urban design policies are included in Section 4.0 of our Planning and Urban Design Rationale report.

4.1 Provincial Policies

The 2020 Provincial Policy Statement (the "2020 PPS") provides overall policy direction on matters of provincial interest relating to land use planning and development. With respect to housing, Policy 1.4.3 requires planning authorities to provide for an appropriate range and mix of "housing options" and densities to meet projected market based and affordable housing needs of current and future residents, including:

- permitting and facilitating all housing options required to meet the social, health, economic and well-being requirements of current and future residents, and all types of residential intensification, including additional residential units, and redevelopment in accordance with Policy 1.1.3.3;
- directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;
- promoting densities for new housing which efficiently use land, resources, infrastructure, and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;
- requiring transit-supportive development and prioritizing intensification in proximity to transit, including corridors and stations; and
- establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.
- A Place to Grow: The Growth Plan for the Greater Golden Horseshoe, 2019 (the "2019 Growth Plan") came into force on May 16, 2019. Subsequently, on August 28, 2020, the 2019 Growth Plan was amended by Growth Plan Amendment No. 1.

In accordance with the Growth Plan policies, the subject site would be considered a "strategic growth area"¹ and "major transit station area". The Growth Plan defines a "major transit station area" as the area including and around any existing or planned higher order transit station or stop within a settlement area. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk. 'Higher order transit' is defined as "transit that generally operates in partially or completely dedicated rights-of-way, outside of mixed traffic, and therefore can achieve levels of speed and reliability greater than mixed-traffic transit". Higher order transit includes heavy rail (such as subways and inter-city rail), light rail and buses in dedicated rights-of-way. In this regard, the subject site is located within the Dundas West and Bloor GO Protected Major Transit Station Areas ("PMTSAs") as defined in Council-adopted Official Plan Amendment No. 524 (OPA 524). See Section 4.0 of our Planning and Urban Design Rationale for further details on OPA 524. At the time this report was written, the Minister had not approved OPA 524.

¹ "Strategic growth areas" are defined by the Growth Plan as nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include, but are not limited to, urban growth centres, major transit station areas, other major opportunities that may include infill and redevelopment, as well as lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors

Section 2.2.6 of the Growth Plan deals with housing. Policy 2.2.6(1) directs municipalities to develop housing strategies that support housing choice through the achievement of minimum intensification and density targets by identifying a diverse range and mix of housing options and densities and establishing targets for affordable ownership housing and rental housing. Notwithstanding Policy 1.4.1 of the 2020 PPS, Policy 2.2.6(2) states that, in implementing Policy 2.2.6(1), municipalities will support the achievement of complete communities by: planning to accommodate forecasted growth; planning to achieve the minimum intensification and density targets; considering the range and mix of housing options and densities of the existing housing stock; and planning to diversify the overall housing stock across the municipality. Furthermore, Policy 2.2.6(3) states that municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes to support the achievement of complete communities.

4.2 City of Toronto Official Plan

Housing Policies

Section 3.2.1 of the Official Plan sets out the City's housing policies. The Official Plan recognizes that adequate and affordable housing is a basic requirement for everyone, and that the City's quality of life, economic competitiveness, social cohesion, balance, and diversity depend on it. The introductory text to Section 3.2.1 goes on to provide areas of focus for housing policies, including the preservation of the existing stock of rental housing.

Policy 3.2.1(1) provides that a full range of housing, in terms of form, tenure and affordability, across the City and within neighbourhoods, will be provided and maintained to meet the current and future needs of residents. A full range of housing includes: ownership and rental housing, affordable and mid-range rental and ownership housing, social housing, shared and/or congregate-living housing arrangements, supportive housing, emergency and transitional housing for homeless people and at-risk groups, housing that meets the needs of people with physical disabilities and housing that makes more efficient use of the existing housing stock.

Policy 3.2.1(2) indicates that the existing stock of housing will be maintained, improved and replenished. The City will encourage the renovation and retrofitting of older residential apartment buildings. New housing supply will be encouraged through intensification and infill that is consistent with this Plan.

Inclusionary Zoning Policies (Official Plan Amendment No. 557)

On November 12, 2021, City Council adopted Official Plan Amendment No. 557 (OPA 557) and Zoning By-law 941-2021 to introduce new requirements for inclusionary zoning to the City's Official Plan and the City-wide Zoning By-law. Inclusionary zoning (IZ) is a land use planning tool that allows municipalities to require new residential development to include affordable housing, which is intended to increase the supply of affordable housing for low to moderate income households, support a diverse range of housing supply and support the development of more inclusive and equitable communities.

OPA 557 adds new policies to Section 3.2.1 of the Official Plan and establishes IZ Market Areas on Map 37. The subject site is located within IZ Market Area 2 as identified on Map 37. The key affordable housing policies introduced through OPA 557 and applicable to IZ Market Area 2 include the following:

Policy 3.2.1(13), as amended by OPA 557, states that new development containing residential units and subject to an inclusionary zoning by-law, outlined in Section 5.1.8 of this Plan, will not be approved unless:

- b) for development that is located in IZ Market Area 2 identified on Map 37: if a condominium development is proposed, a minimum of 8 percent of the total new residential gross floor area shall be secured as affordable ownership housing or a minimum of 6 percent of the total new residential gross floor area shall be secured as affordable rental housing; or if a purpose-built rental development is proposed, there is no minimum requirement for affordable rental housing;*
- d) the affordable housing shall be secured at affordable rents or affordable ownership prices for a period of at least 99 years from the date of first residential occupancy of the unit; and*
- e) the unit mix of the affordable housing reflects the market component of the development, as appropriate, to achieve a balanced mix of unit types and sizes and support the creation of affordable housing suitable for families.*

Policy 3.2.1(14) states that the requirements for affordable housing outlined in Policy 3.2.1.13 will not be applied by the City until the later of September 18, 2022 or approval of a Protected Major Transit Station Area by the Minister pursuant to the *Planning Act*. Accordingly, as the Minister has not approved OPA 570, the requirements for affordable housing as set out in OPA 557 are not yet in effect.

As it relates to inclusionary zoning, concurrent with the adoption of Bill 23², the Province announced a proposed amendment to *Ontario Regulation 232/18* (Inclusionary Zoning) for the purposes of establishing an upper limit on the number of units that can be secured as affordable through a municipal inclusionary zoning by-law, as well as establishing a maximum period during which affordable housing units would be required to remain affordable.

In this regard, the proposed amendment to *O. Reg 232/18* proposes a cap on the number of affordable units that can be secured through inclusionary zoning at 5% of the total number of units, or 5% of the total gross floor area of the total residential units, exclusive of common areas; and limits the maximum period to which units would be required to remain affordable at 25 years. The Minister has not yet formally issued the proposed amendment to *O. Reg 232/18*.

² On October 25, 2022, the Province of Ontario introduced Bill 23, formally known as the "More Homes Built Faster Act, 2022". Bill 23 introduced legislative changes to facilitate and streamline the construction of new homes over the next 10 years to address Ontario's housing crisis. Bill 23 received Royal Assent on November 28, 2022.

4.3 Employment Lands Conversion (Official Plan Amendment No. 591)

On July 22, 2022, City Council adopted Official Plan Amendment No. 591 (OPA 591) and By-law 1106-2022 to permit the conversion of lands designated *General Employment Areas* and *Core Employment Area* to a more permissive land use, such as *Mixed Use Areas*. Among other amendments, OPA 591 introduced a number of Site and Area Specific Policies (SASP) to Chapters 6 and 7 of the Official Plan. As it relates to the subject site, the lands were redesigned from *General Employment Areas* to *Mixed Use Areas*, and Site and SASP 769 was introduced with specific land use provisions related to the subject site.

Draft SASP 796, as adopted by City Council, provides that new development containing residential units on the lands will secure a proportion of units as affordable housing for a period of at least 99 years, in accordance with the following:

- if a condominium development is proposed, a minimum of 10 percent of the total new residential gross floor area shall be secured as affordable ownership housing or a minimum of 7 percent of the total new residential gross floor area shall be secured as affordable rental housing; or
- if a purpose-built rental development is proposed after 2025, a minimum of 5 percent of the total new residential gross floor area shall be secured as affordable rental housing.

OPA 591, including the policies of SASP 796, are not in full force and effect, as the Minister has not yet issued an approval of the conversion request.

4.4 Growing Up Guidelines

In 2015, the City initiated a study entitled *Growing Up: Planning for Children in New Vertical Communities* ("Growing Up Guidelines") and produced draft guidelines to direct how new development can better function for larger households. A staff report summarizing the study process and draft guidelines was adopted by Planning and Growth Management Committee on May 31, 2017, and the report and recommendations were considered by City Council at its meeting on July 4, 2017 and adopted without amendments. On July 28, 2020 a final recommendation report was presented to City Council, and the updated Growing Up Guidelines were adopted.

The intent of the Guidelines is to provide for a better integration of family supportive design into the planning of new multi-unit residential developments. The Guidelines are organized at three scales, based on the recognition that each scale contributes positively to how a family experiences living in a vertical community:

- The Neighbourhood Scale: At the neighbourhood scale, the Guidelines focus on children's experience in the city, promoting independent mobility, access to parks, schools and community facilities.
- The Building Scale: At the building scale, the Guidelines seek to increase the number of larger units, encourage the design of functional and flexible amenity and common spaces, and promote flexible building design for changing unit layouts.
- The Unit Scale: At the unit scale, the Guidelines focus on the size and functionality of spaces to ensure dwelling units can accommodate a family's daily needs. Considerations include ensuring inclusivity for larger and multi-generational households, supporting a range of household types and sizes, providing sufficient room for families to gather and share meals, as well as bedrooms that can comfortably accommodate more than one child.

The use of the term "large units" in the Guidelines refers to two- and three-bedroom units that comply with the design parameters set out in the Guidelines. Large units are intended to meet the needs of households with children, as well as multi-generational families, seniors, and groups of students and/or adults who live together. The guidelines seek to achieve a minimum of 25% two- and three-bedroom units, comprised of 15% two-bedroom units and 10% three-bedroom units.

Section 2.0 of the Guidelines focuses on the design of new buildings. Topics covered in this section include building configuration, typology, design and construction, circulation areas and shared spaces, as well as storage and utility needs. Section 3.0 provides guidelines specific to unit design.

5 Analysis

The proposed redevelopment of the subject site will introduce new forms of housing to an underutilized site that is in proximity to higher order transit. The proposed development supports the wider policy objectives of the Provincial Policy Statement, the Growth Plan, as well as the City of Toronto Official Plan and applicable guidelines.

The proposed development will both enhance and add to the existing housing stock in the area, in conformity with Policies 3.2.1(1) and 3.2.1(2) of the Official Plan, and has provided a unit mix that is in keeping with the Growing Up Guidelines. The proposal will contribute to the supply of housing by intensifying and underutilized site with a full range of housing in terms of both form and tenure, in addition to non-residential uses, for a complete community. The proposed development will add a significant number of high-quality units with excellent transit accessibility to the City's housing stock. As discussed in Section 3 of this Report, a range of unit types and sizes, including a significant proportion of family-sized units, will be provided in the development. This will contribute to the housing options available to existing and future residents of the area. The proposed development will contain a total of 873 residential dwelling units, including 21.3% two-bedroom units and 10.2% three-bedroom units. In addition, 15.8% of the total units has protected for the opportunity to be converted into larger units. All the units will have access to the proposed amenity spaces, as well as access to nearby and onsite open spaces, as well as commercial, retail, cultural and office opportunities.

With respect to affordable housing, neither the policies of OPA 557 or OPA 591 are in force and effect. While both amendments have been adopted by Council, the Minister has not yet issued a final decision. Furthermore, the Minister has not yet formally issued the proposed amendment to *O. Reg 232/18* in accordance with Bill 23. Notwithstanding the current status of these regulations, the Applicant is committed to incorporating an affordable housing component into the proposed development. As the application progresses through the approvals process, and the abovementioned policy documents are adopted by the Minister, the Applicant will work with City Staff on the affordable housing component of this development.

6 Conclusions

The proposed mixed use development supports the policy objectives of the Provincial Policy Statement, the Growth Plan, as well as the City of Toronto Official Plan and applicable guidelines. In particular, the proposal is providing for a range and mix of housing types that will serve the needs of existing and future residents of this transit-supportive community. The proposal has had regard for the City's Growing Up Guidelines in that approximately 31% of the proposed units are 2- and 3-bedrooms in size.

