



# FAIRVIEW MALL REDEVELOPMENT

## HOUSING ISSUES REPORT

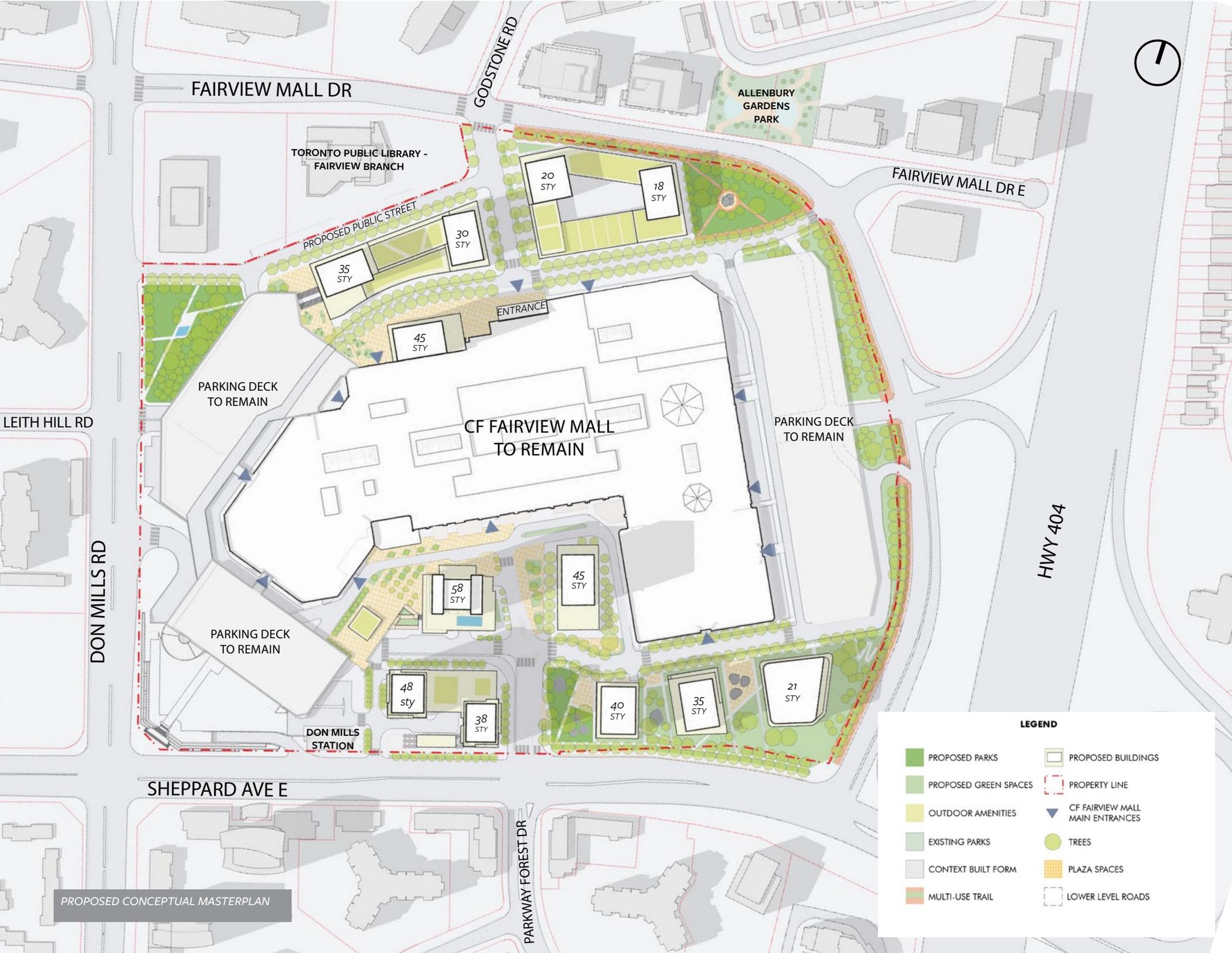
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This Housing Issues Report was prepared by Urban Strategies Inc. for The Cadillac Fairview Corporation Limited (the “Applicant”) in support of its combined Official Plan Amendment (“OPA”), and Zoning Bylaw Application (“ZBA”) for the redevelopment of the site known municipally as 1800 Sheppard Avenue East (the “Site”) in the City of Toronto.

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FAIRVIEW MALL DR

GODSTONE RD

ALLENBURY GARDENS PARK

TORONTO PUBLIC LIBRARY - FAIRVIEW BRANCH

FAIRVIEW MALL DR E

PROPOSED PUBLIC STREET

ENTRANCE

PARKING DECK TO REMAIN

CF FAIRVIEW MALL TO REMAIN

PARKING DECK TO REMAIN

LEITH HILL RD

HWY 404

DON MILLS RD

PARKING DECK TO REMAIN

DON MILLS STATION

SHEPPARD AVE E

PARKWAY FOREST DR

PROPOSED CONCEPTUAL MASTERPLAN



**LEGEND**

- PROPOSED PARKS
- PROPOSED GREEN SPACES
- OUTDOOR AMENITIES
- EXISTING PARKS
- CONTEXT BUILT FORM
- MULTI-USE TRAIL
- PROPOSED BUILDINGS
- PROPERTY LINE
- CF FAIRVIEW MALL MAIN ENTRANCES
- TREES
- PLAZA SPACES
- LOWER LEVEL ROADS

# 1. INTRODUCTION

**This Housing Issues Report was prepared by Urban Strategies Inc. for The Cadillac Fairview Corporation Limited (the “Applicant”) in support of its combined Official Plan Amendment (“OPA”), and Zoning Bylaw Application (“ZBA”) for the redevelopment of the site known municipally as 1800 Sheppard Avenue East (the “Site”) in the City of Toronto.**

The redevelopment of CF Fairview Mall (“the Proposed Masterplan Concept”) provides a unique opportunity to transform 18.8 hectares of land into a dynamic and completely mixed-use urban community with a strong sense of place. The Proposed Masterplan Concept seeks an Official Plan Amendment to develop the Subject Site through a large-scale, multi-phase redevelopment that will include a mix of retail, commercial, residential, and community uses complemented by a range of open spaces. A Zoning Bylaw amendment is being sought for Phase 1 of the project.

The Proposed Masterplan Concept will result in a dynamic new neighbourhood benefiting the broader community. The Proposed Masterplan Concept would enable a new community which could provide a range of housing to meet the needs of a diverse population. Building heights and densities are oriented towards TTC Line 4 subway terminus, Don Mills station, and along the

edges of the site, supporting a transit-oriented development strategy, and serving to insulate the Site from Highway 404 and the other major arterials that surround the Subject Site.

The Applicant proposes an Official Plan Amendment (OPA) in the form of an amendment to the Sheppard East Subway Corridor Secondary Plan to seek an increase in the permitted density on the Site from 1.5 FSI to 2.5 FSI to enable the incremental realization of the Proposed Masterplan Concept. The Application also proposes an implementing Zoning Bylaw Amendment (ZBA) for Phase 1, which includes the creation of 1,416 residential dwelling units, including a mix of 550 rental and 866 condominium ownership tenures, approximately 539 sqm of non-residential uses, and approximately 978 sqm of open space.

New development will be supported by a network of public and private streets. An existing private driveway in the northwest portion of the Site will be extended and dedicated as a new public street to connect Don Mills Road and Godstone Road to enhance site access. A network of private streets and driveways, both existing and new, will continue to serve CF Fairview Mall and provide access to parking and servicing for the Proposed Masterplan Concept. The three new parks will be supplemented with a generous amount of private open space containing a mix of hard and

soft landscape features throughout the Site to contribute to a vibrant public realm. Improved pedestrian and cycling facilities are proposed to be introduced on the eastern side of the site within the Ministry of Transportation highway setback area.

This report supports the finding and analyses provided in the Planning Justification Report, which includes an overview of the broad housing policy context for the Site.

## 2. SITE CONTEXT

**The Site is bounded by Sheppard Avenue East to the south, Don Mills Road to the west, and Fairview Mall Drive to the north and east. The Site contains CF Fairview Mall, surrounded by surface parking areas, parking structures, an internal private road network, and the TTC Line 4 Subway station, bus terminal, and parking structure.**

The surrounding area comprises recently approved residential buildings in a range of 3 storey townhouses – 43 storey towers. To the west of the Site the predominantly mid-rise scale apartment buildings date from the 1960s-1980s, while to the north and south more recently built mid-rise and taller apartments buildings have been built in the 2000s, 2010s, and continue to present. A notable feature of the surrounding area is the TTC Line 4 subway terminus, Don Mills station on the site of CF Fairview Mall. This context continues to change with the recent approval of additional high-density residential development in the vicinity of the Site. To support and guide transit-oriented development along the alignment of the Sheppard subway, the City adopted the Sheppard East Subway Corridor Secondary Plan. It establishes general and area-specific planning policies for new residential and commercial development in

the ‘Key Development Areas’ associated with the Line 4 subway stations. The Site is located within the Area ‘D’ Don Mills Node and receives language supporting additional development on the site and guidance to focus development towards the Sheppard Avenue East-Don Mills Road intersection and integrate development of new buildings with the subway station. The Site is one of many regional shopping malls in Toronto and the surrounding environment is undergoing transformation with new mixed-use development.

The area along the periphery of the Site features segregated land uses and a vast amount of surface parking. This land use pattern creates challenging conditions for pedestrians and cyclists due to its dispersed nature, poor network connectivity, and few streetscape amenities. As a result, the area is still largely auto-centric and daily pedestrian activity and civic life has been internalised to the mall area.



Site and Surrounding Context

# 3. THE PROPOSED DEVELOPMENT

**Redevelopment of the CF Fairview Mall lands presents a unique opportunity to transform an existing mall site into a vibrant mixed-use community that optimises investment in transit, establishes a strong sense of place and reinforces CF Fairview Mall as an important destination and place to live and work within the city.**

At the core of the Site, the existing 77,622 sqm mall will remain in its current form as a premier retail destination serving North York and the broader highway 400-404 nexus in Toronto. Over time, new development will replace the surface parking lots around the mall with new tall building elements containing a mix of residential, office and retail uses, as well as sufficient below-grade parking to support the mall and future residents.

The redevelopment that would be enabled by the proposed Official Plan Amendment is anticipated to take place in phases over many years. The proposed Zoning By-law amendment defines in detail the development proposed to occur first, in Phase 1. As the Site develops incrementally, in accordance with the overall Masterplan vision, new parks and portions of an enhanced internal circulation road system will be dedicated to the City as public infrastructure to support intensification of the Site and area.

The Proposed Masterplan Concept supports enhanced mobility options for the Site including new pedestrian and cycling infrastructure to enable increased active transportation, particularly on the eastern side of the site adjacent to Fairview Mall Drive and the Ministry of Transportation on- and off-ramp system serving Highway 404. The Proposal also enhances the utility of the TTC Line 4 Don Mills subway station and TTC

bus terminal through the development of additional transit-oriented development that will grow public transit ridership and public realm enhancements that will yield safer and more pleasant pedestrian access to transit facilities.

The first phase of development is located on the south-west side of the mall, fronting onto Sheppard Avenue and adjacent to the TTC Line 4 Don Mills subway station and bus terminal. This phase consists of three new tall buildings situated above low-rise podium elements, containing residential and retail uses. A total of 1,416 residential dwelling units are proposed, including a mix of rental and condominium ownership tenures and a diversity of unit types. Phase 1 will comprise of studio units (3%), one-bedroom units (25%), one bedroom + den units (29%), two bedroom units (25%), two bedroom + den units (7%) and three bedroom units (10%). As part of the Proposed Development, open space will be provided throughout the ground plane along with an enhanced pedestrian access and amenity to the TTC Line 4 Don Mills subway station and bus station.

The existing east-west private driveway and bus transit lane will be enhanced with a protected bus transit lane connecting the TTC bus station with Sheppard Avenue. The existing private driveway from the intersection of Sheppard Avenue East and Parkway Forest Drive will remain unencumbered below grade and enhanced to City standards to facilitate potential future dedication as a public street. Vehicular access to the TTC drop-off will be retained and enhanced with a new private driveway connecting into the site from a right-in, right-out connection to Sheppard Avenue East. This driveway will also provide access to the two southern condominium ownership towers for resident vehicles and building loading and servicing.

Phase 1 includes 539 sqm of non-residential uses. This includes a freestanding commercial retail unit located in the pedestrian plaza between the CF Fairview Mall south entrance and the TTC Line 4 Don Mills subway station and bus station. This commercial retail unit, and one located in the base of the northern proposed Phase 1 tower, with rental tenure, will activate the proposed pedestrian plaza and central 'Village Green'. Additional information related to the proposed development is contained in the Planning & Urban Design Rationale report prepared by Urban Strategies in support of the OPA and Phase 1 ZBA application.



DON MILLS RD

FAIRVIEW MALL DR

HWY 404

SHEPPARD AVE E

**PHASE 2**

**PHASE 3**

**PHASE 1**

**PHASE 4**

30 sty

45 sty

35 sty

20 sty

18 sty

58 sty

45 sty

48 sty

38 sty

40 sty

35 sty

21 sty

## KEY STATISTICS OF THE PROPOSED MASTERPLAN DEVELOPMENT

<b>Gross Site Area</b>	<b>188,250 sqm</b>
Developable Area	71,400 sqm
FSI per phase (Total GFA/Developable Area)	2.5
Parkland dedication	7,840 sqm (11.5% of total share area)
Residential GFA	317,000 sqm
Non-Residential GFA	40,000 sqm

Table 1. Proposed Masterplan Concept summary statistics

Note: All figures in square metres unless otherwise indicated. Some values have been rounded.

Phase 1			
Building Summary Developable Area	Tower R1	Tower C1+C2	Total
Residential GFA (sqm)	43,778	59,786	104,292
Non-residential GFA (sqm)	451	0	539
Total GFA (sqm)	44,229	59,786	104,831
Gross FSI	7.17		
Studio	0	46	46
1 Bed	110	250	360
1 Bed + Den	165	242	407
2 Bed	165	196	361
2 Bed + Den	55	46	101
3 Bed	55	86	141

Table 2. Phase 1 summary statistics

Note: All figures in square metres unless otherwise indicated. Some values have been rounded.

# 4. PLANNING FRAMEWORK

The Proposed Masterplan Concept is subject to a planning policy framework that governs land use and guides growth and development in Toronto. Particular plans and guidelines that are of relevance from a housing perspective are the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the City of Toronto Official Plan, the Sheppard East Subway Corridor Secondary Plan and the City of Toronto's Growing Up: Planning for Children in New Vertical Communities Guidelines.

## PROVINCIAL POLICY STATEMENT (2020)

The new Provincial Policy Statement ("PPS, 2020" or "PPS") came into effect on May 1, 2020 and applies to all planning decisions made on or after that date. PPS, 2020 carries forward the intent of the Provincial Policy Statement, 2014, but places increased emphasis on increasing housing supply and mix, amongst other matters.

Section 1.4 of the PPS, 2020 relates to housing. Policy 1.4.1 directs planning authorities to provide for an appropriate range and mix of housing options and densities, including multi-residential buildings, by maintaining the ability to accommodate residential growth for a minimum of 15 years primarily through residential intensification and redevelopment. Policy 1.4.3 further directs that the range and mix of housing options and densities will accommodate projected market-based and affordable housing needs of current and future residents. Achieving a mix of housing is to be accomplished by planning authorities establishing and implementing minimum targets for the provision of housing which is affordable to low- and moderate-income households and which aligns with applicable housing and homelessness plans, amongst other mechanisms.

## A PLACE TO GROW: GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE (2019)

The Growth Plan for the Greater Golden Horseshoe ("Growth Plan") builds on the PPS, providing more specific direction on where and how growth will occur across the region.

The Growth Plan is based on a vision and series of guiding principles that speak to achieving complete communities, prioritising intensification to make efficient use of land and infrastructure, and supporting a range and mix of housing options, among others.

Section 2.2.6 of the Growth Plan sets out the housing policies and includes provisions for municipalities to develop housing strategies and support the creation of complete communities through the achievement of minimum intensification and density targets, identifying a diverse range and mix of housing options and densities, and establishing targets for affordable ownership housing and affordable rental housing. Furthermore, municipalities are to consider using 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. There is no specific percentage target in the Growth Plan for the achievement of affordable housing on a site-by-site basis.

## CITY OF TORONTO OFFICIAL PLAN

Section 3.2.1 of the Official Plan (“OP”) highlights the need for diverse housing options in order to meet the housing needs in the city, and recognizes that the delivery of rental housing is a key priority. Policy 3.2.1.1 states 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”. Provision of housing supply through intensification and infill is encouraged (Policy 3.2.1.2).

Policy 3.2.1(3) and 3.2.1(4) both speak to the need for partnerships in the delivery of housing, and affordable housing in particular, recognizing that all levels of government have a role to play and that assistance should be provided, where appropriate, to encourage the production of affordable housing. Assistance to deliver housing may include loans and grants, land at or below market rates, fees and property tax exemptions, rent supplement and other appropriate means.

Policy 3.2.1.9 notes that large sites, generally greater than five hectares, are seen as opportunities to achieve a mix of housing types and affordability. Policy directions include:

- a minimum of 30 percent of new housing units in forms other than single and semi-detached houses (3.2.1.9.a);
- where an increase in height and density is proposed, the first priority community benefit will be the provision of 20 percent of the additional residential units as affordable housing (3.2.1.9.b).

Policy 3.2.1.9.b also lists a number of mechanisms for the provision of the 20 percent affordable housing contribution. These mechanisms include:

- The construction of units on-site;
- The conveyance of land in the development to the City for the purpose of affordable housing;
- With the agreement of the developer, affordable housing units constructed near the development site or elsewhere in the City;
- The conveyance of land to the City for the purpose of affordable housing near the Proposed Development site; and
- Cash in lieu for the purpose of constructing affordable housing in or near the Proposed Development site.

Policy 3.2.1.9 is explicitly tied to Section 5.1.1 of the OP, which sets out the City’s policies with regard to the provision of community benefits through applications for additional height and/or density under Section 37 of the Planning Act.

Section 3.2.1.9.b of the Official Plan, as quoted above, does not explicitly require that affordable housing be provided on large sites generally greater than 5 hectares, but rather encourages the provision of affordable housing as a “first priority” community benefit provided through Section 37 agreements and in particular on-site affordable housing. The applicant will be pleased to discuss with City staff how to realize affordable housing as a “first priority” community benefit through the processing of the application, , for example as an in-kind contribution in lieu of community benefits charge.

## SHEPPARD EAST SUBWAY CORRIDOR SECONDARY PLAN

Toronto City Council adopted the Sheppard East Subway Corridor Secondary Plan to implement a planning and urban design framework for the Sheppard Avenue East area. The Plan sets out a planning framework to direct and ensure quality development along the Sheppard East Subway Corridor in support of significant public investment in the TTC Line 4 subway.

## **COMMUNITY BENEFITS CHARGES, PARKLAND DEDICATION AND S.37**

On September 18, 2020 Ontario Regulation (O. Reg) 509/20 came into force to implement the new community benefits charge (CBC) and parkland dedication regime. In effect, this new regulation concludes the lengthy process initiated by the province, through Bills 108, 138 and 197, to amend the Planning Act and change the ways that municipalities can impose development charges, Section 37 community benefits, and parkland dedication onto private development.

O. Reg 509/20 also starts a 2-year transition period, meaning that municipalities will have until September 18, 2022 to implement the new framework and pass a CBC By-law under Section 37 of the Planning Act, thereby replacing the former Section 37 framework. Existing Section 37 provisions regarding height and density bonuses remain in effect until the earlier of the passing of a new CBC By-law, or September 18, 2022. In addition, O. Reg 509/20 introduces a maximum cap for a community benefit charge that can be imposed on new development at 4% of the assessed land value. Overall, this new transition regulation brings about greater clarity around the provision of community benefits, including affordable housing, which can be secured as part of the proposed development.

## **INCLUSIONARY ZONING**

City Council adopted Official Plan Amendment 557 and Zoning By-law 941-2021 Inclusionary Zoning in November, 2021. This allows municipalities to implement Inclusionary Zoning, a planning tool that requires a given share of new construction to be affordable by people with low to moderate incomes. Inclusionary Zoning can only be implemented by Municipalities within Protected Major Transit Station Areas (PMTSAs), or within areas with a Community Planning Permit System. PMTSAs are to be delineated within Official Plans, adopted by City Council, and approved by the Minister of Municipal Affairs and Housing.

The Inclusionary Zoning applies to strong and moderate market areas which were identified based on a variety of criteria including average home prices and rents, and household income. The adopted Inclusionary Zoning framework is limited to those areas that are within the strong and moderate market areas, which are also within a PMTSA or community planning permit system area. Zoning By-law 941-2021 requires between 5-10% of the total gross floor area for affordable rental or affordable ownership housing units depending on the market overlay area. The required affordable units are to be provided as affordable for a minimum of 99 years.

Currently, the Proposed Development does not fall within an Inclusionary Zoning area as currently defined. However, OPA 557 indicates that IZ market areas will be reviewed at least every 5 years as part of the update to the Inclusionary Zoning Assessment Report. Therefore, the applicability of Inclusionary Zoning on the site may apply in future phases of development.

## **ZONING**

The Subject Site is not governed by the current City of Toronto Zoning By-Law 569-2013 as amended, but rather the former City of North York Zoning By-law 7625. Under this zoning by-law, it is zoned C3(7) District Shopping Centre under By-Law 31736. An application for a Zoning By-law Amendment is required as additional residential use permissions are being sought across the site.

## **GROWING UP: PLANNING FOR CHILDREN IN NEW VERTICAL COMMUNITIES**

The Growing up Guidelines provide a set of strategic directions for increasing liveability for larger households and households with children, delivering diverse housing options, and ensuring more complete communities. When provided in the lower portions of the building, larger units can have direct access to outdoor amenity spaces, which enable children to interact with their environment while being safe and supervised from the units above (Guideline 2.1).

Guideline 2.1 describes the importance of providing larger units for families in vertical communities. The guidelines outline the benefits of providing family units, including how it helps foster a sense of community. The Guidelines specify that a minimum of 25% of units should be large units, including 10% three-bedroom units and 15% two-bedroom units.

# 5. ANALYSIS

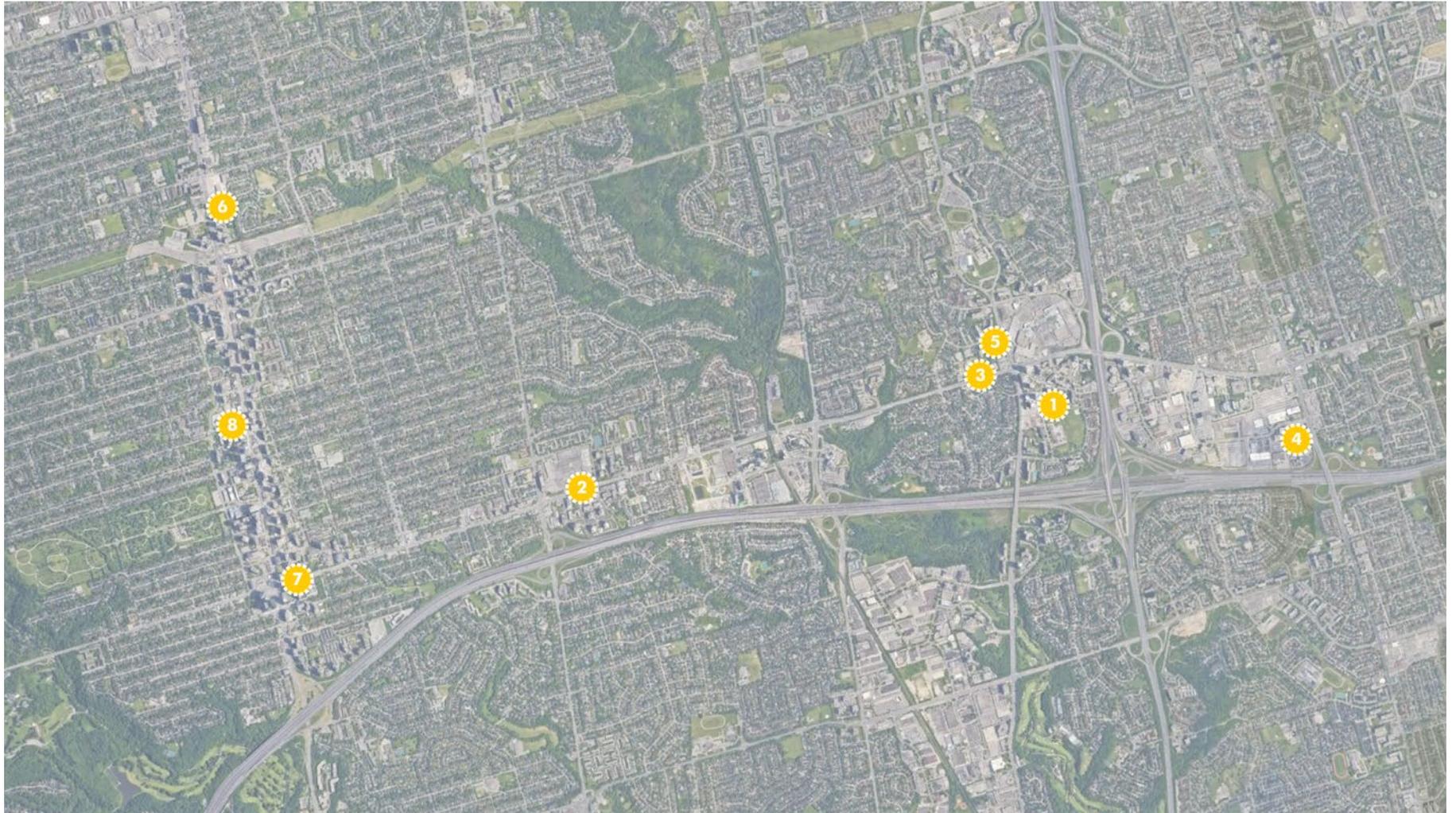
## NORTH YORK (WARDS 17 AND 18) S. 37 AFFORDABLE HOUSING CONTRIBUTIONS

A review of local and city-wide development sites has been undertaken to examine the provision of affordable housing through the development process. The local review has focused on Wards 17 and 18 in North York, and includes both “large sites” as per OP policy 3.2.1.9, and other sites where an increase in height and/or density was sought.

The first two sites in Table 3 qualify as “large sites” greater than or equal to 5 hectares in size. The remaining sites are below the 5-hectare threshold, but are examined here due to their provision of affordable housing. These sites include both approved and proposed developments. The type, tenure, duration and affordability of these units vary, with a mix of both affordable rental and ownership, at different durations, and units including both affordable and mid-range rental rates.

#	Address	Ward	Status	Site Area (ha)	Units	Affordable Housing Component
1	100-125 Parkway Forest Drive, 120- 130 George Henry Blvd, and 32-80 Forest Manor Road (Parkway Forest)	17	Approved	13	1221	Cash-in-lieu contribution of \$1 million special rent supplement program that will be administered by the City throughout the Parkway Forest community.
2	2901 Bayview Avenue and 630 Sheppard Avenue East	17	Under Appeal	8.68	1030	An affordable housing contribution to be provided onsite, having a total value of \$4,474,500.
3	1650 Sheppard Ave East	17	Approved	0.9	480	Owner to provide and maintain at least 10 dwelling units as one bedroom affordable rental dwelling units in the new 31-storey residential building on the lot.
4	2450 Victoria Park Avenue	17	Approved	1.9	1029	Affordable housing and/or multi-purpose community agency space to be provided at the discretion of the Chief Planner and Executive Director, City Planning, in consultation with the Ward Councillor.
5	2600 Don Mills Road	17	Approved	1.36	610	Provision of 19 affordable housing units.
6	5799-5915 Yonge Street and 46 and 47 Averill Crescent	18	Approved	4.03	856	Owner to enter into an affordable housing delivery agreement with the City to secure the inclusion of five percent (5%) of all residential dwelling units within each of Block 1, Block 2 and Block 3 as part of the Program in accordance with the terms of an affordable housing delivery agreement.
7	4841 - 4881 Yonge Street; 2 & 50 Sheppard Avenue East and 2, 4 and 6 Forest Laneway	18	Approved	2.46	399	Owner to provide and maintain at least 21 affordable rental dwelling units with rents no higher than mid-range rents, which units shall be of a size to the satisfaction of the City’s Chief Planner and Executive Director, City Planning Division.
8	5220 - 5254 Yonge Street and 78 Ellerslie Avenue and 32 Churchill Avenue	18	Approved	0.65	308	Provision and maintenance on the site of at least 7 new Affordable Rental Replacement Units, and which units shall be of a size to the satisfaction of the Chief Planner and shall be maintained as rental housing units for at least twenty (20) years.

Table 3. Affordable Housing Contributions in Ward 17 and Ward 18.



Location of Sites in Ward 17 and Ward 18 with Affordable Housing contributions.

## CITYWIDE LARGE SITES AFFORDABLE HOUSING CONTRIBUTIONS

An additional eight sites were reviewed within the broader City-wide context. Six of the eight sites qualify as “large sites” with the other two site falling just under the 5-hectare threshold. Most sites provided an on-site contribution of affordable housing, with the seventh site providing a cash-in-lieu contribution towards affordable housing within the immediate vicinity of the development. All of the affordable housing provisions were secured as Section 37 contributions within the site-specific Official Plan Amendments and Zoning By-Law Amendments. The affordable housing contribution as a percentage of total units varied amongst the five sites, ranging from 5% to 15% of the total units provided. The type, tenure, duration and affordability of these units varied significantly, with a mix of both affordable rental and ownership, durations of 20 to 49 years, and affordability of 80% to 100% Average Market Rent (AMR).

#	Address	Ward	Status	Site Area (ha)	Units	Affordable Housing Component
1	675 Progress Avenue	24	Approved	4.6	1371	\$170,000 contribution to TCHC for capital improvements.
2	3850 Sheppard Avenue	22	OMB Appeal	10.5	4725	Affordable Housing contribution will be determined through a future Section 37 agreement, and will be treated as the first priority benefit, in accordance with Policy 3.1.2.9 of the Official Plan. City's expectation is that if land will be conveyed to the City to construct affordable housing, an amount sufficient to construct 20 percent of the residential units will be conveyed to the City. In the case of delivery of built units, where the developer will maintain ownership of the units, 10 percent of the units are to be provided.
3	1213 York Mills Road	16	Approved	5.6	1880	270 rental replacement units within a variety of housing types; \$250m for capital improvements to affordable housing.
4	844 Don Mills Rd, 1150 and 1155 Eglinton Avenue East (Celestica)	16	Approved	24	4974	390 affordable rental units for a period of 49 years at 80% AMR and at least 8 affordable ownership units for a period of 20 years.
5	1245 Dupont St.	9	Approved	4.9	2846	150 affordable housing units secured and provided through the Open-Door Affordable Housing Program. 120 of these units are to be constructed and delivered on site; 30 will be secured through a cash contribution to the City.
6	2277 Sheppard Ave W.	7	Approved	16.2	560	25% of new dwelling units in all multiple residential buildings 20 or more units.
7	2175 Keele St (Humber River Hospital)	5	Approved	5.9	650	3 affordable ownership units for a period of 20 years.
8	82 Buttonwood Ave (West Park Healthcare Centre)	5	Approved	10.9	N/A	15% of new residential units proposed as affordable.

Table 4. Affordable Housing Contributions across the City.

# 6. CONCLUSION

**The Proposed Masterplan Concept and the implementing ZBA will contribute to expanded housing opportunities in an area of the City that is identified for growth and intensification. The proposal will enable the development of an appropriately broad range of housing for a diversity of household sizes and life stages, including the Phase 1 Proposal which includes 42% of units as 2 and 3 bedroom units.**

Pursuant to Policy 3.2.1.9 of the Official Plan, where there are future developments where an increase in height and/or density is sought, the first priority community benefit to be secured will be the provision of affordable housing.

The precise nature and quantity of affordable housing provided by the Proposed Masterplan Concept will continue to be refined over the course of the application process, and will be determined through future phase-specific processes.

The applicant is open to exploring opportunities to provide affordable housing contributions in conjunction with the development of the site, for example as an in-kind contribution as a part of community benefits charges.

The community benefits to be secured on the Site, including those that may be related to housing, will consider the City's various priorities and will balance these within the 4% cap for determining the maximum community benefit charge. Community benefits will also consider the various types, tenures, durations and affordability of units secured on comparable sites within the local context and the broader city-wide context.



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