

February 28, 2019

Mr. Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
17th floor 777 Bay Street
Toronto, ON M5G 2E5

Dear Mr. O'Hara:

**RE: Proposed Amendment 1 to the Growth Plan
Comment Submission on behalf of Manulife Investments
75 Billy Bishop Way, Toronto
ERO No. 013-4504**

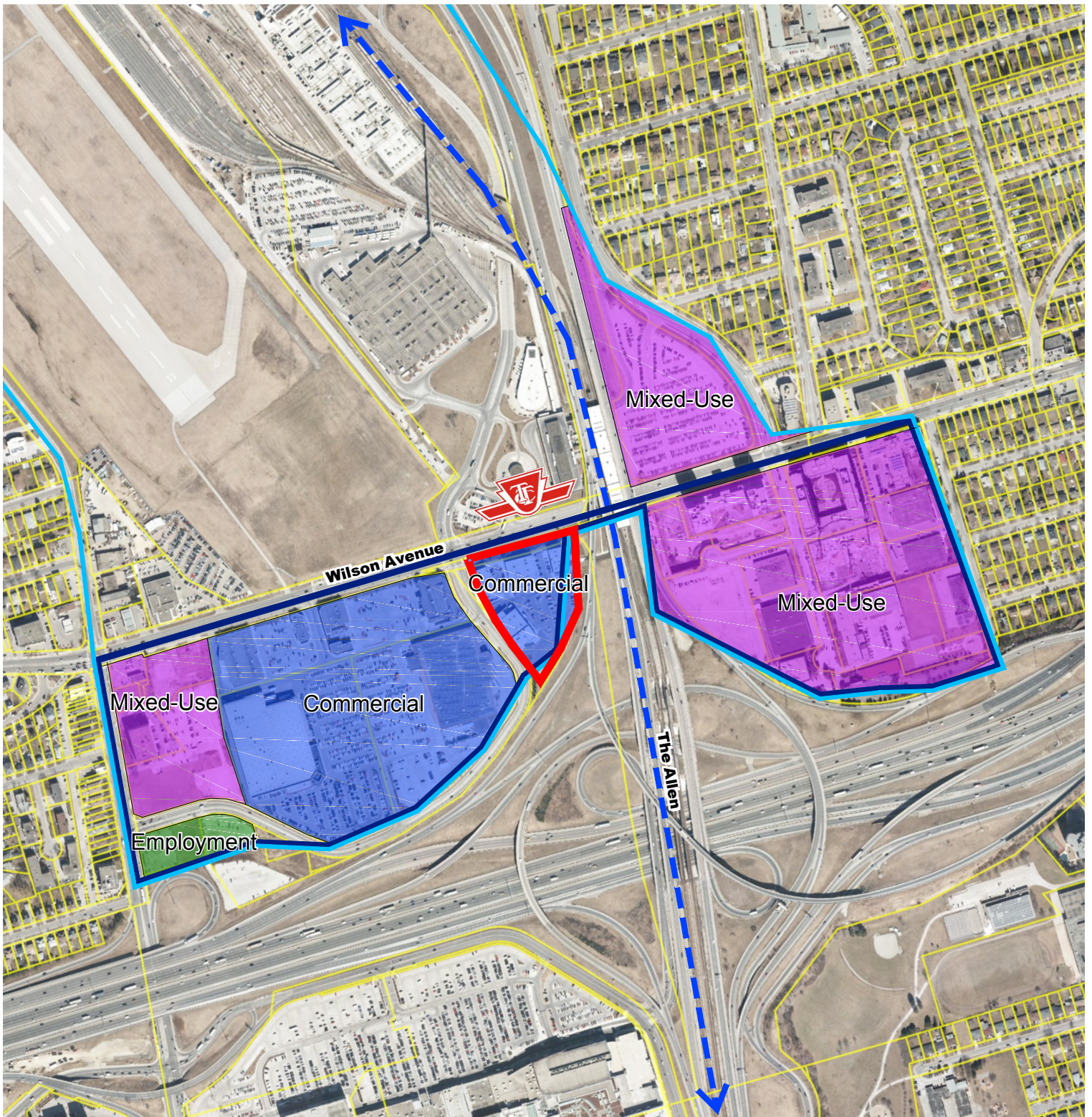
We, Manulife Investments, have reviewed the proposed Amendment 1 to the Growth Plan for the property municipally addressed as 75 Billy Bishop Way, Toronto (the "Property").

We write to submit our comments on the proposed amendment and, without limitation, to request the amendment described in bold, below. We submit that the Amendment results in overly restrictive policies that do not appropriately promote and/or support growth at and around the Property.

Without limiting the foregoing, we understand that conversion of employment lands will continue to require a comprehensive assessment of the implications for economic development by the Ministry of Municipal Affairs and Housing (MMAH). The most significant proposed change is the introduction of Provincially Significant Employment Zones ("PSEZ") mapping across the GTA. We are concerned with the extent of this mapping and its accuracy vis-à-vis existing land uses and municipal Official Plan mapping.

The lands at 75 Billy Bishop Way have been included within the proposed PSEZ 9 (400 407 Keele Dufferin). The subject lands have been developed for retail commercial purposes. The lands are within 800 metres of a Major Transit Station Area (MTSA), going immediately adjacent to Wilson Subway Station (**Figure 1**). Furthermore, lands to the west (Dufferin/Wilson) and east (Tippett Road) have been re-designated to mixed use with higher density residential uses either planned or under construction.

A MTSA is defined within the Growth Plan as area including and around an existing or planning higher order transit station or stop within a 10 minute walk (500 m to 800 m). The concept of intensification around MTSA's has been in place since the 2006 Growth Plan was released. The designation of a PSEZ which is intended to protect major or heavy industrial does not match the commercial use and mixed use character of Wilson Avenue or Billy Bishop Way.



Data Source: Government of Ontario- Proposed Provincially Significant Employment Zones Web Mapping (2018)

Figure 1
Proposed Provincially Significant Employment Zones

LEGEND

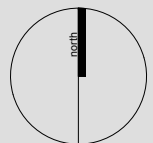
- Subject Lands
- Proposed Provincially Significant Employment Zones
- Commercial Lands
- Mixed Used Lands
- Employment
- Lands to be Removed from PSEZ
- Existing Commuter Rail Line
- Wilson Subway Station

DATE: February 28, 2019

SCALE 1:7500

75 Billy Bishop Way
Toronto, Ontario

N:\07101D - 75 Billy Bishop Way, Toronto\2019\February\CAD\07101D - Figure Mapping 25 February 2019 - (Billy Bishop).dwg



We request the subject lands and those within the MTSA limited south of Wilson Avenue be removed from the PSEZ to implement increased density and investment with a mix of uses in proximity to a MTSA.

Further, we request that should the mapping be modified that additional consultation is undertaking to ensure the mapping is accurate and request the Province undertake further consultation with affected landowners on PSEZ mapping where municipalities have requested increased PSEZ limits which was not subject this consultation.

We appreciate your attention to this matter and hope that our request to correct this mapping is undertaken.



Thank you.

Yours truly,

Bryan Siekierko
Portfolio Manager

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 **Manulife**