

Posted Online (to Environmental Registry Ontario)

28 February 2019

Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street
c/o Business Management Division, 17th floor
Toronto, ON M5G 2E5

Dear Mr. O'Hara:

**Re: Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017*
(ERO # 013-4504)
Proposed Framework for Provincially Significant Employment Zones
(ERO # 013-4506)**

**Submissions by Desjardins Financial Security Life Assurance re: Town Centre
Plaza, City of Toronto**

We represent Desjardins Financial Security Life Assurance ("Desjardins") in connection the Town Centre Plaza, which includes the municipal addresses 1455-1457 McCowan Road and 41-47 Milner Avenue in the City of Toronto, Ontario (the "Site"). On behalf of Desjardins, we have reviewed the Province's proposals noted above as they apply to the Site and submit the following comments for the Minister's consideration.

Summary

Desjardins requests that the Site remain outside of the *Provincially Significant Employment Zone boundary*, notwithstanding the City of Toronto's submission to add further City lands into the boundary.

The Site (Town Centre Plaza)

The Site is approximately 14.5 acres and is located at the southeast corner of McCowan Road and Milner Avenue. The Site is currently improved with a number of office, institutional, service, and retail uses known as the Town Centre Plaza.

The Site is designated *Employment Area* in the Toronto Official Plan. Notwithstanding its current land use designation, the Site is also located within 800 metres of the proposed Sheppard LRT (McCowan Station) and also in close proximity to the existing McCowan SRT station and the planned Scarborough

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Subway Extension. We note the Site is not proposed to be included in the *Provincially Significant Employment Zone* (“PSEZ”) boundary.

Desjardins and its consultant team have assessed the feasibility of intensifying the Site for a range of uses, including office, residential, and retail uses in accordance with the planned and/or proposed transit initiatives in the surrounding area, including the Scarborough Subway Extension (from Kennedy Station to Scarborough Centre) and the Sheppard LRT. In this respect, it is notable that the employment area surrounding the Site consists of predominately retail and office uses, including the CTV Toronto offices to the west, and light industrial uses to the east and is not needed to attract new investment or retain existing industries.

Desjardins and its consultants concluded that the Site represents an excellent opportunity to create transit-supportive development in this area.

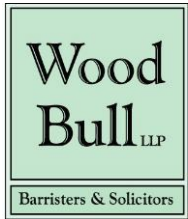
Submissions on the Proposed Growth Plan Amendments and Provincially Significant Employment Zones

(1) Planning for Employment

Desjardins supports the Minister’s intention to create “a modernized employment area designation system that ensures lands used for employment are appropriately protected while unlocking land for residential development” and to streamline growth management planning in the Greater Golden Horseshoe. In particular, Desjardins is supportive of the proposed policy 2.2.5.10 which would permit municipalities a one-time window to undertake employment land conversions before the next municipal comprehensive review, bringing more flexibility for employment lands and incentives for transit-supportive development.

Desjardins is also supportive of the modification to the definition of “Major Transit Station Area”, to expand the radius from 500 to 800 metres, to allow greater flexibility in identifying the appropriate extent of an intensification area surrounding a public transit station. As noted above, the Site is located in proximity to existing and planned transit stations and represents a potential opportunity for redevelopment for an intensified mix of uses. If the Site continues to remain outside of a PSEZ, as currently proposed in Amendment 1, it would offer the flexibility and opportunity to redevelop the Site for mixed uses in conjunction with transit initiatives in the area, without having to wait for the next municipal comprehensive review.

We have reviewed City of Toronto staff report dated 25 February 2019, and note that the City proposes to request the Province to include additional City lands within the PSEZ boundary. The City’s proposed additional PSEZs include the Site, as shown in Attachment 6 to the 25 February 2019 staff report, attached hereto. For the reasons noted above, Desjardins is not in agreement with this request as it



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would unduly restrict the ability of the Site to redevelop for more transit-supportive uses, at least in the interim.

(2) Land Use Compatibility

Desjardins further submits that the intention of proposed policy 2.2.5.8 is unclear. Policy 2.2.5.8 as proposed reads:

2.2.5.8 The development of sensitive land uses over major retail uses or major office uses will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other uses that are particularly vulnerable to encroachment.

It is Desjardins' submission that the language used in policy 1.2.6.1 in the *Provincial Policy Statement, 2014* regarding land use compatibility better captures the protection of both major facilities (industrial, manufacturing, or other uses) and sensitive land uses and policy 2.2.5.8 should be modified to reflect the intent and criteria of the development of those uses:

1.2.6.1 Major facilities and sensitive land uses should be planned to ensure they are appropriately designed, buffered and/or separated from each other to prevent or mitigate adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term viability of major facilities.

Desjardins would be pleased to provide additional information related to the Site if it would assist in considering the requests made in this submission.

Thank you in advance for your consideration of these matters.

Yours very truly,

Wood Bull LLP

A handwritten signature in blue ink, appearing to read "Jshapira", is written over the typed name.

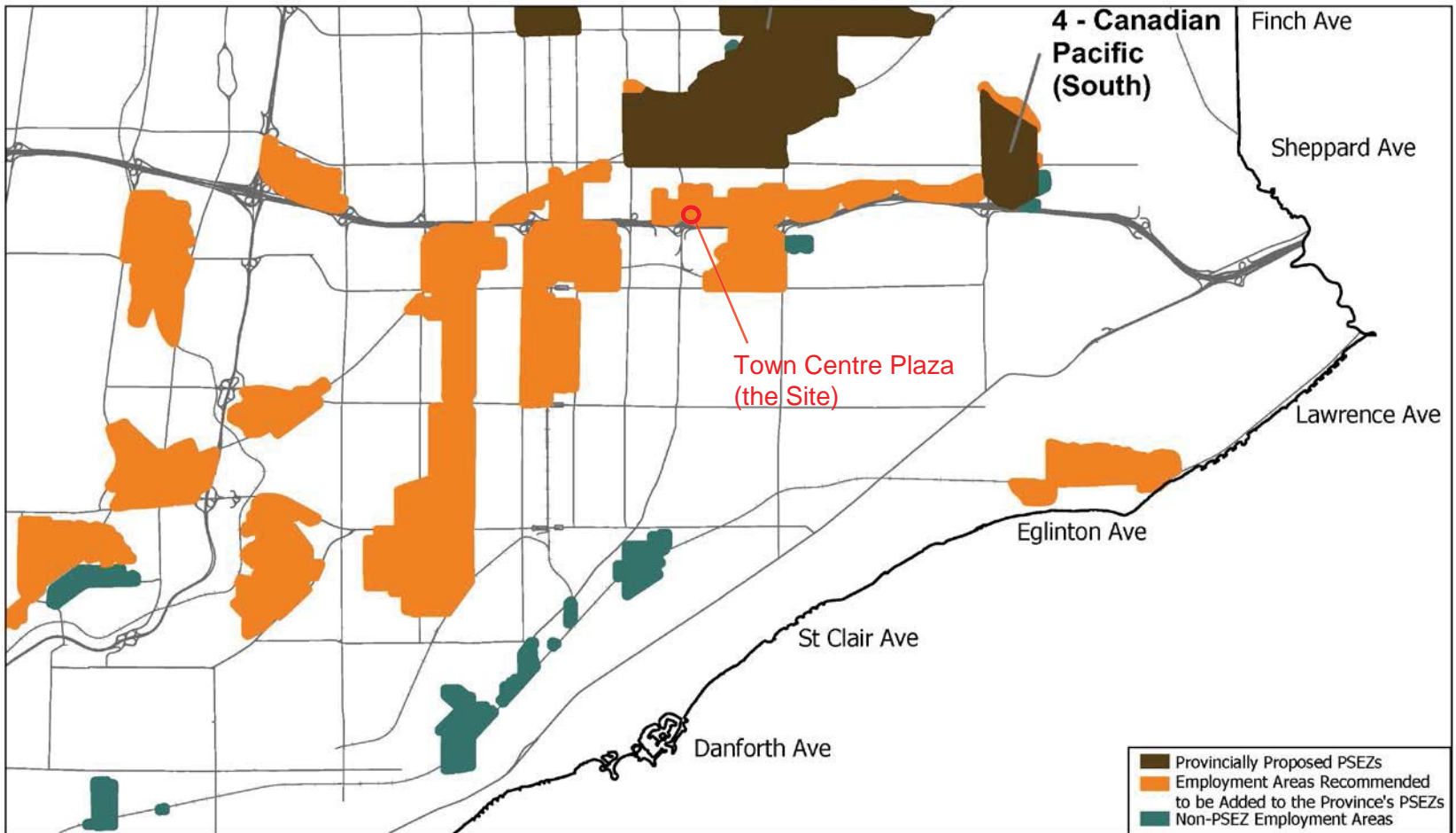
Johanna R. Shapira

JRS

c. Client



Attachment 6: City Comments on Proposed Provincially Significant Employment Zones (PSEZs), Southeast Toronto



Data Source: Ministry of Municipal Affairs and Housing; Toronto Official Plan

Toronto City Planning, Research and Information - February 25, 2019