

February 28, 2019

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:

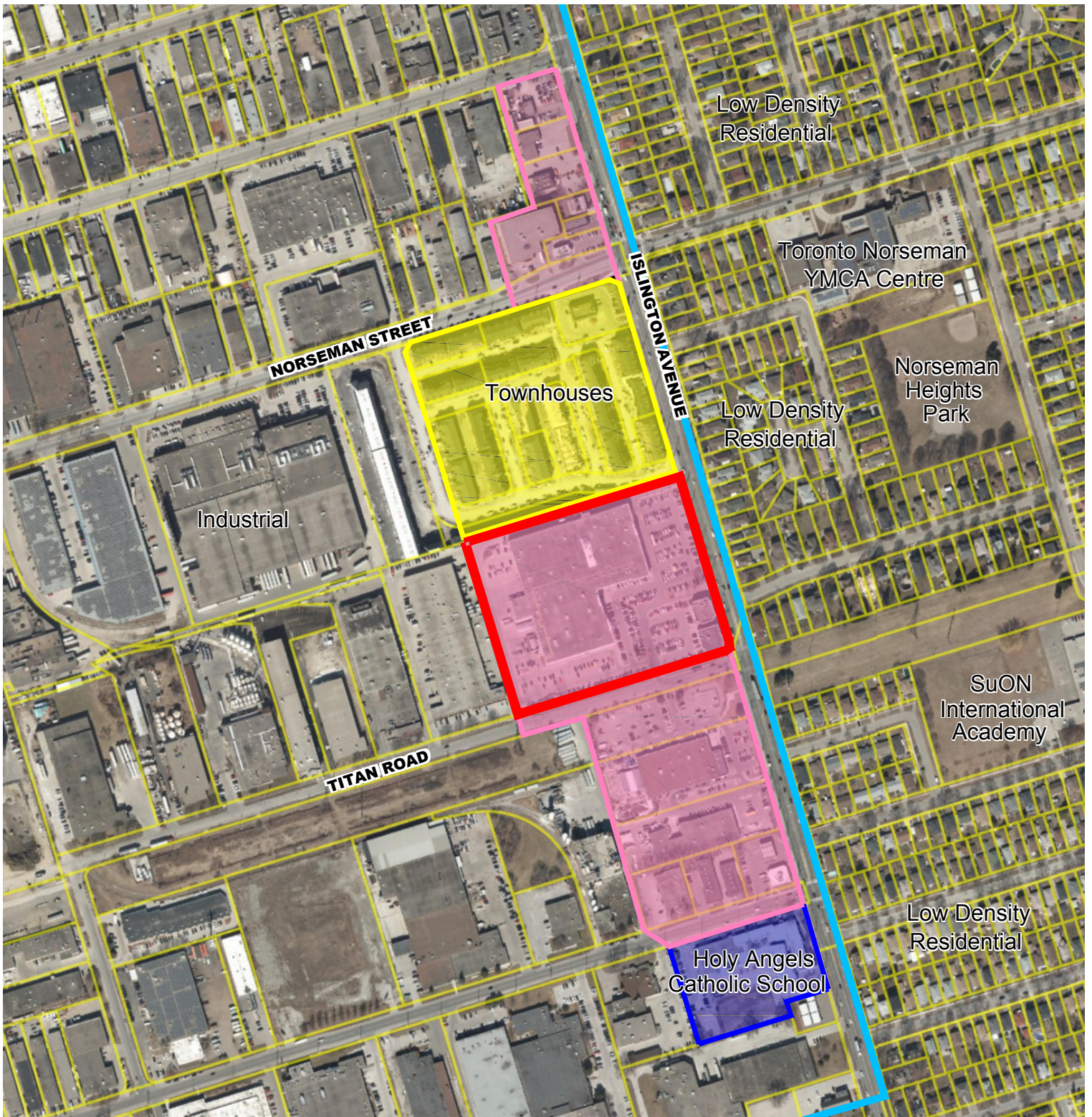
**RE: PROPOSED AMENDMENT 1 TO THE GROWTH PLAN
COMMENT SUBMISSION ON BEHALF OF TITAN SR PLAZA LP
1020 ISLINGTON AVENUE, TORONTO
ERO NO. 013-4504
OUR FILE Y378CI**

We have been retained by Titan Sr. Plaza LP (hereinafter "Client") to review the proposed Amendment 1 to the Growth Plan for the property municipally addressed as 1020 Islington Avenue, Toronto ("Titan Plaza").

To become better informed and exchange comments on the Proposed Amendment 1 to the Growth Plan (the "Amendment"), MHBC has attended a number of Regional Workshops hosted by the Province.

Based on our review of the Amendment, it is understood that conversion of employment lands will continue to require a comprehensive assessment 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 seriously concerned with the extent of this mapping and its accuracy vis-à-vis existing land uses and municipal Official Plan mapping.

The City of Toronto Official Plan currently designates the subject lands as mostly Mixed Use, and at present, Titan Plaza provides local retail and commercial uses to surrounding residents. The subject lands consist of the following uses, including but not limited to a No Frills Grocery Store, South St. Burger, Artisano Bakery Café, Value Village and Once Upon a Child. It is important to note the subject lands provide local commercial uses to the surrounding area including a newly constructed townhouse development immediate north of the subject lands, as well as existing residential and open space to the immediate east (**Figure 1**).



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

Figure 1

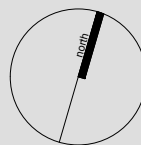
Proposed Provincially Significant Employment Zones

LEGEND

- 1020 Islington Avenue
- Proposed Provincially Significant Employment Zones
- Commercial Lands
- Institutional Lands
- Residential Lands

DATE: February 25, 2019

SCALE 1:5000



**1020 Islington Avenue,
Toronto, Ontario**

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MHBC

**PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE**

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The purpose and intent of the mixed use designation is to encourage a variety of uses, based on the permitted uses of Mixed Use designation in the Toronto Official Plan, which include, among other things, commercial and residential uses.

We recognize the intent of the Amendment is to reflect existing designations and not to make any land use changes. However, the Province's mapping erroneously includes Titan Plaza within PSEZ 13 (427 QEW). This is in direct conflict with the Official Plan designation and zoning for Titan Plaza, as well as the adjacent lands along Islington Avenue, which consist of residential and mixed use developments.

The Province's proposed Section 2.2.5.12 of the Growth Plan requires that lands within a PSEZ be protected for employment uses through Official Plan policies and related land use designations. If implemented, this provision appears to require that the City re-designate Titan Plaza for employment purposes as part of its Official Plan review, which would ultimately be carried through to the zoning. This is in contrast to the current mixed use permissions for Titan Plaza lands.

We request the subject lands and adjacent lands consisting of residential and mixed use developments along Islington Avenue be removed from the PSEZ to enable these lands to realize the increased density and investment envisaged by the Toronto Official Plan. In addition, we request that additional consultation be undertaken to ensure the accuracy of the PSEZ mapping.

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

Thank you.

Yours truly,

MHBC



David A. McKay, BES, MSc, MLAI, MCIP, RPP
Vice President & Partner

cc.; S. Bishop