

2/28/2019

Mr. Charles O'Hara  
Ontario Growth Secretariat, Ministry of Municipal Affairs  
777 Bay Street  
c/o Business Management Division, 17<sup>th</sup> Floor  
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Toronto, ON  
M5G 2E5

From: Leona Savoie, Hullmark Developments

Dear Mr. O'Hara,

**RE: Comments regarding the Province of Ontario's Proposed Amendment No. 1 to the Growth Plan for the Greater Golden Horseshoe  
ERO Nos. 013-4504, 013-4505 & 013-4506**

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Following our review of the Proposed Amendment No. 1 to the Growth Plan for the Greater Golden Horseshoe (the "Proposed Amendment") as announced by the Province of Ontario on January 15, 2019 and our attendance at the Toronto Growth Plan Regional Roundtable on February 13, 2019, we are pleased to submit our comments for your review and use. Our comments concern the proposed changes to Employment Areas, the introduction of Provincially Significant Employment Zones, Major Transit Station Areas and the City of Toronto's recommendations as adopted at the Planning and Housing Committee meeting of February 12, 2019 and the City Council meeting of February 26, 2019.

### **Provincially Significant Employment Zones**

We support the introduction of "Provincially Significant Employment Zones" (PSEZs) in principle and further requests for consultation for such areas. We encourage the Province to engage with the public in refining aspects of the PSEZs, including their location and as they relate to Major Transit Station Areas. Furthermore, we support the establishment of a one-time period outside of a Municipal Comprehensive Review per Policy 2.2.5.10 for the potential conversion of Employment Areas, however, we ask that the Province introduce additional language in the Proposed Amendment to provide direction regarding what would constitute a "one-time window of opportunity" and for this provision to be utilized. We note that further clarity on the one-time window is necessary to provide certainty for all stakeholders.

We do not support the City of Toronto's recommendations that all five of the City's "office parks", including Liberty Village, be included in the PSEZ designation. Our comments regarding the City's recommendations in regards to the Proposed Amendment are outlined in a subsection below. We ask that the Province consider these concerns when reviewing the City's requests pertaining to the Proposed Amendment.

### **Major Transit Station Areas**

We support the initiative to expand the definition of Major Transit Station Areas (MTSAs) to an expanded radius of 500 m to 800 m of a transit station for municipalities outside of the City of Toronto. However, in this regard we agree with the City of Toronto's recommendations that the existing 500 m radius be reinstated with the boundaries of the City of Toronto. In our opinion, the City of Toronto has not appropriately planned for density along higher-order transit corridors and planning efforts have largely been diminished by political 'NIMBY' tactics. Until the City makes braver decisions to appropriately plan along planned transit, we maintain that any restrictions in these areas should be kept at a minimum.

Furthermore, we would like to emphasize the importance of maintaining transit-supportive density and encouraging intensification within MTSAs. We believe that where Employment Areas and PSEZs overlap with MTSAs the higher density targets should prevail in order to ensure transit-supportive development and investments in transit infrastructure are realized in terms of job creation.

### **City of Toronto Recommendations**

As noted above, the City of Toronto's Planning and Housing Committee considered a report outlining the City's preliminary comments on Proposed Amendment 1 and outlined 16 recommendations that were subsequently adopted by City Council on February 26, 2019, forming the City's position on the Proposed Amendment. We note, the complete report including the recommendations was made available on February 12, 2019, the date it was considered by the Planning and Housing Committee. Furthermore, a supplementary report was made available less than 24 hours prior to the City Council meeting of February 26, 2019. We do not agree with several of the recommendations and ask that the Province consider the concerns we have identified when reviewing the City's submission. In particular, we believe the City's request that 95% of the City-designated Employment Areas be included as PSEZs is inappropriate as many of these areas, in particular Liberty Village, do not meet the provincial criteria or intent.

**Recommendation 2, 4 & 5**

We object to the City's request that "office parks", such as Liberty Village, are adopted as Provincially Significant Employment Areas. The in-force policies pertaining to Employment Areas and conversions are adequate to protect employment uses in the office parks. Furthermore, employment area conversions are subject to prescribed criteria and potential, future conversion should not be arbitrarily restricted.

In particular, Liberty Village is located in close proximity to the Downtown and accommodates a range of employment uses, including emerging creative and technology-based industries. This area functions largely as a mixed-use area with residential uses, restaurants, recreation, retail and employment interacting in close proximity. Designation as a PSEZ could have the unintended consequence of hindering employment growth this area that is distinguished from the Province's identified PSEZs and more industrial-based Employment Areas.

Liberty Village is an ideal location for intensification of employment uses and can accommodate the demands for high-quality office space in Toronto. The existing street network and property ownership in this area is not reflective of large, continuous constraint-free land for large industries as identified by the Province for PSEZs. Furthermore, we believe that this area will better achieve a higher concentration of employment and economic output through facilitating the development of high-quality employment space and more flexible uses and in our opinion, would be greatly enhanced with the additional of residential uses. We ask that the Province scrutinize the inclusion of 95% of designated Employment Areas as PSEZs as requested by the City of Toronto and in particular, reject the City's request to include Liberty Village as a PSEZ.

Furthermore, we believe that the City is hindering their ability to plan for the emerging employment trends by utilizing strict protectionist mechanisms for fear that if even the slightest amount of residential uses or retail is allowed in Employment Areas, it will "open the floodgates". Employment trends are changing, the needs of tenancies are changing and manufacturing is not what is used to be. The City must acknowledge this and create new tools to "enhance" employment districts and not use old tools, restricting any changes whatsoever to protect the old employment existence. We support the province's position that if you can demonstrate that employment uses are being maintained, that other uses can be introduced as long as they are compatible with existing uses.

**Recommendation 6**

We object to the City's request for the Province to revise the Proposed Amendment to allow municipalities to set minimum employment space

thresholds for new development in mixed-use areas where no employment uses previously existed. We believe this recommendation will negatively impact the quality and feasibility of providing employment space within mixed-use areas. We note that employment space requires certain sizes and layouts to provide high-quality space that is not suited for every development and is not within the areas of expertise for every developer. Application of this recommendation could manifest in arbitrary requirements for employment space where no such uses previously existed, resulting in subpar employment space where the market does not demand such use and potentially impacting the affordability and delivery of housing and employment space.

**Recommendation 11**

We believe the City's request may limit intensification in Employment Areas and is contrary to the Province's overarching goals. As the Province has engaged with stakeholders regarding the overlap of PSEZs and MTSAs, we think similar engagement should occur prior to rendering a decision on these potentially conflicting policies.

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Yours truly,

Leona Savoie  
*VP Development*