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Our File No. 131974

VIA EMAIL

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Attention: Vicki Long, *Ontario Growth Secretariat*
(growthplanning@ontario.ca)

Dear Ms. Long:

Re: Map of Proposed Provincially Significant Employment Zones for Consultation
Zone Name: 427 QEW
Zone Number: 13

We are the lawyers for RioCan Holdings (Queensway) Inc., the owner of the lands located at the south west quadrant of The Queensway and Islington, municipally known as 1000-1037 The Queensway, Toronto (the "**RioCan Cineplex Site**"). The RioCan Cineplex Site is currently developed for commercial uses including a theatre with a large surface parking area set behind commercial buildings along the Queensway.

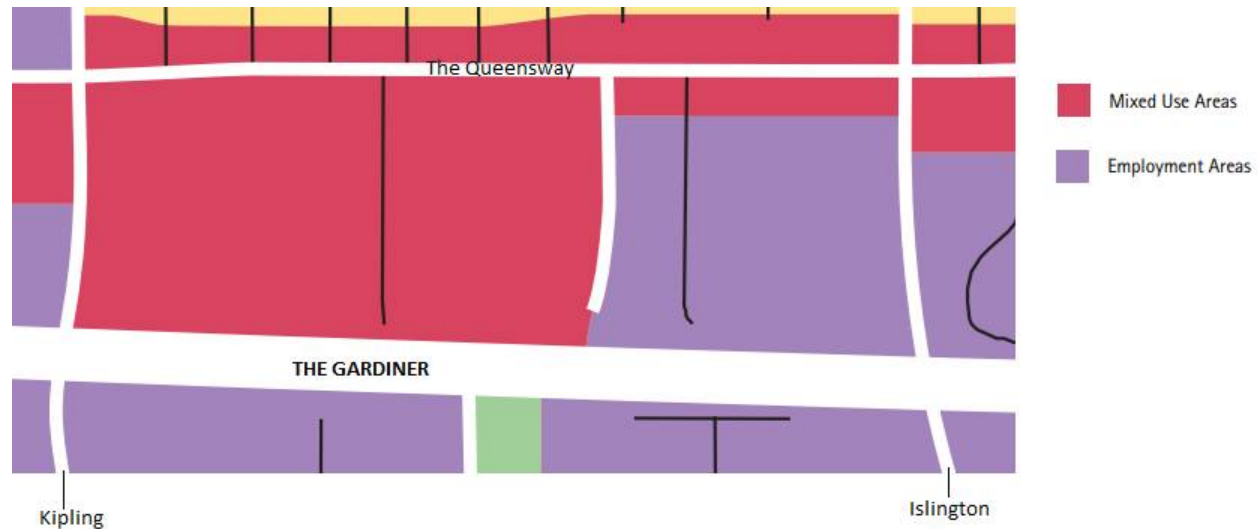
On January 25, 2019, we received a copy of the Ministry of Municipal Affairs and Housing's map book of the proposed Provincially Significant Employment Zones that would receive enhanced protection for employment uses under Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017.

Having reviewed the map book, we are writing to respectfully request the removal of all the lands between Kipling Road and Islington Avenue on the south side of The Queensway and north of the Gardiner Expressway (the "**Block**") from the proposed PPSEZ included at Zone Number: 13, 427 QEW.

We believe that the Block is not appropriate for inclusion in the PPSEZ for the reasons set out below.

Including the Block in the PPSEZ is inconsistent with in force land use designations. As shown in Map 15 from the City of Toronto Official Plan (a portion of which is excerpted below) with the exception of the southerly portion of the RioCan Cineplex Site and a small commercial strip

on the west side of Dorchester Avenue (which are designated Employment Area), all of the land in the Block is designated Mixed Use Area.



Furthermore, as is noted in the land use designation schedule, all of the land in the Block along The Queensway frontage including the northerly portion of the RioCan Cineplex site is designated as Mixed Use and Avenue in the City's Official Plan. Avenues are intended for re-urbanization to accommodate a substantial portion of Toronto's new housing units.

In the context of the City of Toronto's review of its employment lands in 2013, RioCan submitted a request for conversion of the remaining Employment Area in the Block to Mixed Use Area (consistent with the designation of all other lands included in the Block). That conversion request is currently under appeal at the Local Planning Appeal Tribunal, premised on the existing and emerging residential character of the Block and the absence of any significant employment activity.

Including the Block in the PPSEZ is inconsistent with the established development pattern and area context emerging on The Queensway. Special Policy Area #6, which governs the lands between St. Lawrence Avenue and Zorra Street, defines the Block's emergence as a high-density mixed use area. It specifically contemplates mixed use development with 1,270 units and 83,772 sq.m. of commercial space together with a system of public parks and public roads.

Currently, a portion of the Block and the lands included within Special Policy Area #6 are being developed by the Remington Group. This development utilizes the entire depth of the lands from The Queensway to the Gardiner for the construction of medium and high density residential buildings. At present, the Remington Group development consists of four buildings already completed (two of 12 storeys and two of 24 storeys) with 3 more planned, including a 42 storey tower adjacent to the Gardiner.

In addition to the Remington development which is centrally located in the Block, there are a number of new residential and mixed use development applications recently approved or under consideration. In the summer of 2018, the City approved a 35 storey residential building at 30-44 Zorra Street, adjacent to the Gardiner. Our client RioCan, currently has a development application for the Mixed Use Area portion of its site at 1001, 1007, 1011 and 1037 The Queensway to permit the construction of four residential apartment buildings with commercial uses at grade.

The approved and under consideration development applications in the Block are shown in the following figure:



Provincially significant employment zones are those areas intended to accommodate and support jobs and economic growth at a regional scale. The existing and emerging development pattern for the Block includes The Queensway Avenues mid-rise component and high density residential uses interior to the Block. This planning context, is inconsistent with the proposed identification of the Block as a provincially significant employment zone. There is no significant employment within the Block suitable for protection. RioCan Cineplex, which is the largest site within the block still designated employment is occupied by a cinema and large surface parking area.

We look forward to your consideration of this request.

FOGLER, RUBINOFF LLP

"Joel D. Farber"

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*Services provided through a professional corporation

cc: Matthew Ortved, *RioCan REIT*