

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 FIMA
1800 The Queensway, Toronto
ERO No. 013-4504

We act as legal counsel for FIMA Development (being a Joint Venture between Mantella and Sons Investment Limited and Horner Developments Limited [hereinafter the `Client`]) to review the proposed Amendment 1 to the Growth Plan for the property municipally addressed as 1800 The Queensway, Toronto.

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

Based on our review of the Amendment, it is understood that conversation of employment lands will continue to require a comprehensive assessment and 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.

Our client's lands have been included in proposed Provincially Significant Employment Zone 13 (427 QEW). The subject lands are designated as Mixed Use Areas in the City of Toronto Official Plan (see attached land use map). This designation permits high-rise residential, commercial, and significant retail uses. This designation is not consistent with a PSEZ. In addition to this the lands are located within 800 m of the proposed West Mall

GO Station and future TTC West Mall Subway Station (which would meet the criteria of an MTSA) (Figure 1).

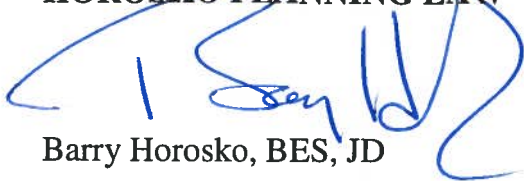
The subject lands are used for service commercial and retail. Further The Queensway corridor includes a variety of retail and service commercial uses. Lastly our clients are currently in the planning approvals process to permit a high density mixed use development to implement the Mixed Use Area designation of the official Plan. The designation of a PSEZ which is intended to protect major or heavy industry which does not match the mixed use land use character along The Queensway. Given the above, the proposed PSEZ on the subject lands would limit the potential for development on with site within an MTSA and will not accurately articulate the planned context of these lands.

We therefore request the subject lands and lands south of the CPR/rail line be removed from the PSEZ to implement increased density and investment with a mixture of uses as intended by the Official Plan. In addition, we request that should the mapping be modified that additional consultation is undertaken to ensure the mapping is accurate.

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

Thank you.

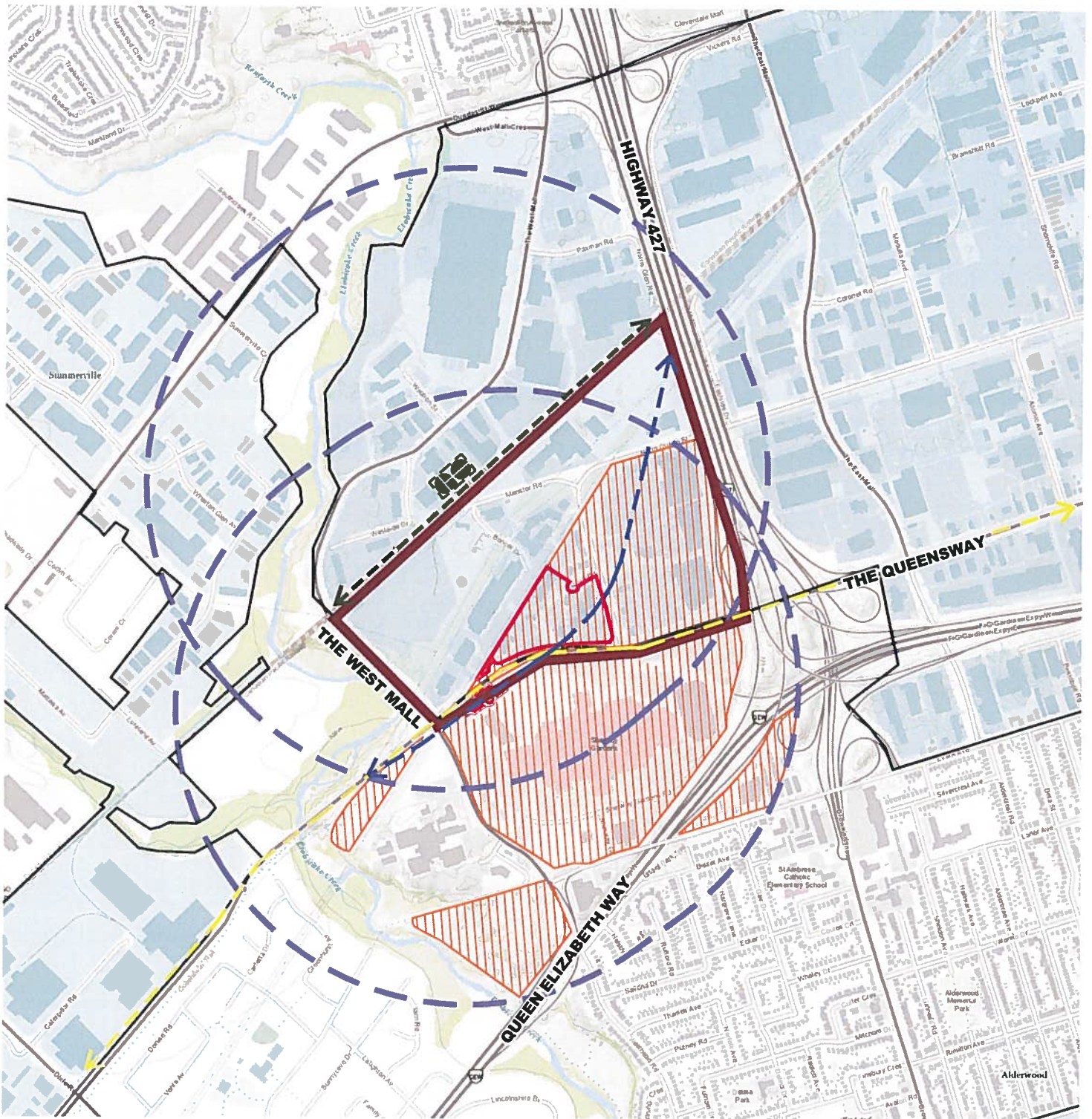
HOROSKO PLANNING LAW



Barry Horosko, BES, JD

cc.: FIMA
D. McKay

Encl.



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

Figure 1
Proposed Provincially Significant Employment Zones

LEGEND

- Subject Lands
- Lands to be Removed from PSEZ
- Proposed Provincially Significant Employment Zones
- Lands Designated Mixed-Use Areas (Toronto Official Plan)
- 800 Metre Radius Around Transit Stations
- Previously Identified West Mall GO Station- GO Milton
- Proposed Bloor-Danforth Line and The West Mall Subway Station
- The Queensway Transit Priority Segment

DATE: February 28, 2019

SCALE 1:15000



R116468A - 1800 The Queensway, Bloor/Danforth/University/Queen/CAD/16/162A- Figures Mapping 25 February 2019.dwg

**1800 The Queensway,
 Toronto, Ontario**

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