



**SMARTCENTRES®**

3200 HIGHWAY 7 | VAUGHAN, ON. CANADA L4K 5Z5  
T 905 326 6400 F 905 326 0783

February 28, 2019

Charles O'Hara  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M5G 2E5

Dear Mr. O'Hara:

**RE: Proposed Amendment 1 to the Growth Plan  
Various Lands across Ontario  
ERO No. 013-4504  
OUR FILE 07132BJ**

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SmartCentres is pleased to submit comments as one of the largest real estate investment trusts in Canada.

SmartCentres, which is publicly traded on the TSX with an asset value of over \$9.4 Billion, is a fully-integrated real estate provider with expertise in acquisition, asset management, planning, development, leasing, operations, property management, and construction under one roof. SmartCentres owns and manages 34 million square feet of retail space across Canada; approximately 70,000 jobs are associated with SmartCentres' landholdings.

We appreciate the Province's genuine interest in considering our comments as a significant landholder. To be better informed and exchange comments on the Proposed Amendment 1 (hereinafter "Amendment") to the Growth Plan, SmartCentres together with MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") attended 5 of the 6 Regional Workshops hosted by the Province.

SmartCentres is appreciative and supportive of the Province reviewing the current policy regime to enhance and protect employment lands within the Province of Ontario. It is our understanding the policy framework aims to:

- increase and promote economic growth;
- reduce congestion and provide residents easy access to business and services; and
- build communities that maximize infrastructure investments, while balancing local needs for the agricultural industry and natural areas.

Furthermore, the Amendment of the Growth Plan will allow employment area conversions to be approved prior to the next Municipal Comprehensive Review ("MCR"), allowing flexibility to municipalities to support mixed use development and protect employment areas.

Based on our and MHBC's review of the Amendment, it is understood that conversion of employment lands will continue to require a comprehensive assessment and 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 Greater Golden Horseshoe. We have some concerns with the extent of this mapping and its accuracy vis-à-vis existing land uses and municipal Official Plan mapping.

We understand that a number of parties have made submissions to the Province, including upper and lower tier municipalities. Some municipal submissions that we have reviewed have proposed additional PSEZs (for example, the City of Toronto has proposed new areas, many of which we believe are not accurate and/or should not be included as they do not meet the criteria). To ensure a fair, reasoned, and open process to mapping changes, we request that additional consultation occur with landowners where changes to the mapping are proposed.

On a matter of principle, we submit that the current conversion process under the Growth Plan which can only occur through an MCR is cumbersome, expensive, and unresponsive to changing market conditions. In order to ensure Ontario remains competitive and resilient to global market forces, including both employment and housing, flexibility to allow for conversions is needed. We have proposed a number of detailed changes to the Growth Plan policies accordingly, specifically:

1. The importance of Major Transit Station Areas ("MTSA") to provide for a mix of uses in an intensified built form to ensure full utilization of transit infrastructure investments is recognized in our proposed policy modifications. A policy has therefore been proposed to allow private applications to convert employment lands where employment lands are within a MTSA without the need for an MCR.
2. We are proposing a policy which would allow for the "layering" and "addition" of uses in a development proposal without the need for an MCR. This will allow for new housing and employment opportunities to occur at intensified levels while maintaining and / or enhancing the creation of jobs on a property.
3. A policy is proposed to allow applications to convert employment lands without the need for an MCR for up to 10% of a municipality's employment lands outside of MTSA's. This would allow for a municipality to collaborate in a positive manner with the private sector to unlock employment lands in response to changing market conditions.

We request further discussions occur with the Province on these modifications.

The following comments on the proposed Growth Plan Amendment 1 are being submitted formally in response to the Environmental Bill of Rights Notice. To assist, we have identified key themes to guide our discussion with regards to our recommendations.

## RECOMMENDATIONS / CLARIFICATIONS

1. We request the removal of 11 sites which are located in MTSA from being within PSEZ due to:
  - Intent for increased densities within a MTSA through Municipal Official Plan Policies;
  - Existing Land Use Designation (not employment);
  - Planning Infrastructure (high-order transit and intensification corridors); and
  - Create complete communities close to higher order transit.
  
2. We request nine sites outside of MTSA be removed from PSEZ due to:
  - Existing Land Use Designation (not employment);
  - Surrounding Context;
  - Identified as an intensification and/or transit corridor within Municipal Official Plans.
  
3. We propose the following policy modifications and/or request clarifications to existing and proposed policy with the rationale as outlined below:

Growth Plan Policy	Proposed Recommendation	Rationale
Policy 2.2.4.2 and new 2.2.4.5	Province delineates MTSA boundaries with policy revisions requiring implementation by municipalities.	<p>The concept of intensification around MTSA has been in place since the 2006 Growth Plan was released. Since this time, few municipalities have undertaken the necessary exercises to delineate MTSA. Where these exercises have occurred, densities have been minimized especially where existing low-density residential areas are in proximity or within MTSA.</p> <p>To fully utilize transit investment and expedite new housing starts, the Province should delineate these areas.</p> <p>This would be a similar exercise / policy response as was undertaken for the delineation of Urban Growth Centres by the Province.</p>
Policy 2.2.4.3	<p>Revise minimum density requirements to reflect Floor Space Indexes (FSIs) and be increased as follows:</p> <p>a) Minimum of 8.0 FSI for those that are served or planned to be served by subways;</p> <p>b) Minimum of 5.0 FSI for those that are served or planned to be served by light rail transit or bus rapid transit;</p>	<p>The use of FSIs as a basis for measurement is more appropriate and provides a relationship with municipal Official Plan policies which utilize FSIs rather than persons and jobs per hectare. Alternatively, the persons and jobs per hectare minimums should be increased to the equivalent FSIs noted in our recommendation.</p> <p>Based on recent municipal exercises for areas that would meet the definition of being designated as a MTSA, the density provisions being set by municipalities set the level of</p>

Growth Plan Policy	Proposed Recommendation	Rationale
	<p>c) Minimum of 5.0 FSI for those that are served by the GO Transit rail network; and</p> <p>d) Minimum of 8.0 FSI for those that are served or planned to be served by the interchange of two or more of the above higher order transit services.</p>	<p>intensification too low thus resulting in an underutilization of transit investment.</p> <p>The proposed FSI is a minimum and it is encouraged for municipalities to go beyond the proposed minimum FSI within a MTSA.</p>
Policy 2.2.4.4 b)	AMEND policy 2.2.4.4 to remove "high-ridership" and replaced with "ridership".	The amendment will not limit the quantity of ridership for lower density areas within an MTSA.
Policy 2.2.5.7 c)	Delete	The 2006 Growth Plan (and carried through the 2017 Growth Plan) discriminated against major retail facilities from locating within employment areas, despite these facilities providing significant jobs. We request that this policy be deleted so that all types of employment will be recognized in employment areas.
NEW	<p>ADD a new policy following Policy 2.2.5.9 which states:</p> <p>"Notwithstanding Policy 2.2.5.9, an application can be made to convert lands in an MTSA without the need for a Municipal Comprehensive Review (MCR), where it can be demonstrated to the Municipality that:</p> <ul style="list-style-type: none"> <li>a) Compatibility of the proposed land use with existing employment uses or employment uses permitted in the zoning by-law in the Employment Area;</li> <li>b) Provide for and contribute to a broad range of stable employment opportunities;</li> <li>c) Provide prominent access and visible locations for proposed uses;</li> <li>d) Contribute to a balance between jobs and housing to reduce the need for long-distance commuting and encourage travel by transit, walking and cycling; and/or</li> <li>e) Provide work opportunities for residents within the immediate area.</li> </ul>	<p>The addition of this policy would allow for flexibility within a MTSA to allow for proposals to come forward outside of an MCR.</p> <p>The proposed policy would allow development within a MTSA to fully utilize transit investments made by the Province and municipalities by allowing a mix of uses at transit-supportive densities.</p> <p>We believe that the conversion process should be applicant driven rather than relying on a MCR to re-designate lands for a more compatible use.</p> <p>We understand there is a need for employment within MTSAs. However, not allowing the flexibility of residential uses (along with the employment uses including retail and institutional uses) within these areas will not meet the intent of this Plan in achieving complete communities at a municipal level and result in the underutilization of transit investments.</p>
NEW	<p>ADD new policy following 2.2.5.X (above)</p> <p>"Notwithstanding policy 2.2.5.X, where an overlap between Employment lands and potential Major Transit Station Areas, the Growth Plan's MTSA policies take precedence</p>	The addition of this policy would protect lands within an MTSA area to achieve the necessary densities to support higher-order transit infrastructure.

Growth Plan Policy	Proposed Recommendation	Rationale
	and establish minimum density targets for Employment Areas”.	
NEW	<p>ADD new policy following Policy 2.2.5.X (above).</p> <p>“Notwithstanding policy 2.2.5.9 and policy 2.2.5.X, private applications to allow for additional uses in employment designated lands shall be permitted. These applications shall not be considered a conversion of employment land where non-residential uses are maintained. Applications shall be evaluated by municipalities based on the following criteria:</p> <ul style="list-style-type: none"> <li>a) Compatibility of the proposed land use with existing employment uses or employment uses permitted in the zoning by-law in the Employment Area;</li> <li>b) Provide prominent, access and visible locations for proposed uses;</li> <li>c) Maintaining the same level or increasing the number of jobs on the property.</li> </ul>	<p>The addition of this policy is to create a layering of uses within employment areas which are located outside of a MTSA. The purpose of this policy is to ensure employment areas are enhanced through a mix of uses to recognize an agile workforce and the needs for amenities within Employment Area.</p>
Policy 2.2.5.10 (as amended)	<p>AMEND proposed policy 2.2.5.10 to read:</p> <p>“Notwithstanding policy 2.2.5.9 and policy 2.2.5.X, private applications to allow conversions of employment designated lands shall be permitted outside of a Municipal Comprehensive Review. No more than 10% of a municipality’s employment land outside of MTSAs may be converted through this process.”</p>	<p>The MCR process is a complicated, time consuming, and expensive process. Flexibility to respond to specific requests for the conversion of lands to respond to changing market conditions is essential to keeping the housing and employment markets healthy.</p> <p>Private applications should be permitted for conversion requests outside of an MCR at any time, not just on a one-time basis before the next MCR as currently proposed.</p> <p>It is recognized that these applications should be evaluated against evidence-based criteria and that further discussions with the Province will be required.</p>
Policy 2.2.5.10 b) (assuming above modification requested is not made)	<p>a) maintain a significant <b>the same or increase</b> the number of jobs on those lands.</p>	<p>Should our amended Policy 2.2.5.10 not be made, we request further clarification be provided for “<i>significant number of jobs</i>” in proposed Policy 2.2.5.10 b).</p> <p>It is important to ensure that clarity be provided so that abuse of this policy does not occur when requests for conversions are made. We suggest that the policy be revised to maintain or increase existing employment levels.</p>

Growth Plan Policy	Proposed Recommendation	Rationale
Policy 2.2.5.11	Delete Policy 2.2.5.11	<p>The 2006 Growth Plan (and carried through the 2017 Growth Plan) discriminated against major retail facilities from locating within employment areas, despite these facilities providing significant jobs. We request that this policy be deleted so that all types of employment will be recognized in employment areas.</p>
Policy 2.2.5.12	Clarification of policy intent and mapping.	<p>We appreciate the Province’s intentions to protect and promote Employment Areas. However, the policy intent should be clarified such that the designation of PSEZ’s should not be used to arbitrarily result in the denial of conversion requests by municipalities. Further, the PSEZ mapping should be applied to major and / or heavy industries.</p> <p>Lastly, as is noted later in this submission the PSEZ mapping should be corrected where mixed use and other “non-employment” designations (as currently defined by the Growth Plan) exist in municipal Official Plans.</p> <p>We further understand that changes to the PSEZ mapping have been requested by municipalities. We request consultation with landowners occur before the final PSEZ mapping is finalized.</p>
Policy 2.2.5.14 (NEW)	Delete Policy 2.2.5.14	<p>The Growth Plan has a long history of protecting <i>Employment Areas</i> (a defined term effectively meaning a “cluster” of businesses or economic activities).</p> <p>The proposed Growth Plan also intends to protect the existing or potential jobs on a standalone employment parcel, or employment lands. It is suggested that there are numerous standalone employment land parcels that are underutilized and/or not developed for employment uses in various areas subject to the Growth Plan that are inappropriate or unviable for employment land purposes.</p> <p>The forced retention of all or a portion of these lands has the opportunity to reduce the viability of nearby or adjacent housing uses through incompatible uses. It is submitted that the new employment area conversion policies of 2.2.5.10 are not even afforded to the employment land policy of 2.2.5.14 and thus, employment lands are now more greatly “protected” than employment areas.</p>

Growth Plan Policy	Proposed Recommendation	Rationale
		It is requested that these “employment lands” not be afforded the same or similar retention policies as “employment areas” which are typically viable locations for numerous jobs to be created.
Add definition of Employment Uses	Employment Uses shall include land uses where persons are employed and shall include, but not be limited to manufacturing, warehousing, offices, retailing, service commercial, institutional, health care, retirement / long term care, education, and community uses.	<p>Employment Uses are recognized in the Provincial Policy to include any and all uses that generate employment. Retail (all forms and sizes), institutional, health care, retirement / long term care, education, community uses are important contributors to job creation and retention in the Province. In many cases, these uses employ significantly more persons than manufacturing and warehousing uses. These employment uses should not be discriminated against and should be recognized as important components of the Province’s economy. To this extent, they should be recognized as the employment uses permitted within Employment Areas and not considered conversions under the Growth Plan policies.</p> <p>We note that other policies in the Provincial Policy Statement and Growth Plan require compatibility to be achieved and thus these employment generating uses should not be excluded from locating arbitrarily from locating in Employment Areas.</p>
Definition of Major Retail	Delete	Given the policy request above, the definition of Major Retail should be deleted.
Add Definition of Job	A job shall mean all work place status types, including those with no fixed place of work and those who work at home; and all industry types including retail, industrial and service jobs, regardless of location.	Jobs should not be distinguished between by type and should be treated equally relative to land use policy decisions.
Definition of Major Transit Station Areas	The area including and around any existing or planned higher order transit station or stop within a settlement area <sup>1</sup> , or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate <del>500 to</del> 800 metre radii of a transit station, representing about a 10-minute walk.	Modify definition to increase to 800 metre minimum limit, as this may be used to limit intensification around MTSAs.
Definition of Office Parks	Areas designated in an official plan where there are significant concentrations of offices with high employment densities.	We are in support of the definition change. Further office parks should not be considered PSEZs as the intent of PSEZs is to protect major industry and heavy industrial users.

Based on the recommendations above, we believe flexible language in Provincial policy will achieve appropriate built form, public realm, and transit supportive densities which will fully utilize transit investments within MTSA and Employment Areas.

### **PROVINCIALY SIGNIFICANT EMPLOYMENT ZONE MAPPING**

We have reviewed approximately 190 SmartCentres sites that may be affected and believe that revisions to the proposed Provincially Significant Employment Zones (PSEZ) should occur for 20 sites. The attached Figures include Provincially Significant Employment Areas and Official Plan Mapping overlays.

The rationale for these requests is outlined below but can be summarized as follows:

1. The sites are within 800 metres of a MTSA and based on our recommendations above should be permitted to be redeveloped for a mix of uses at transit supportive densities;
2. Are not designated as “employment” in the municipality’s Official Plans;
3. Contextually should not be considered “Provincially Significant” due to existing and / or planned uses on and surrounding the site.

For the remaining sites not included in the submission, we support the proposed mapping, and we respectfully request additional consultation be made should revisions to the mapping occur.

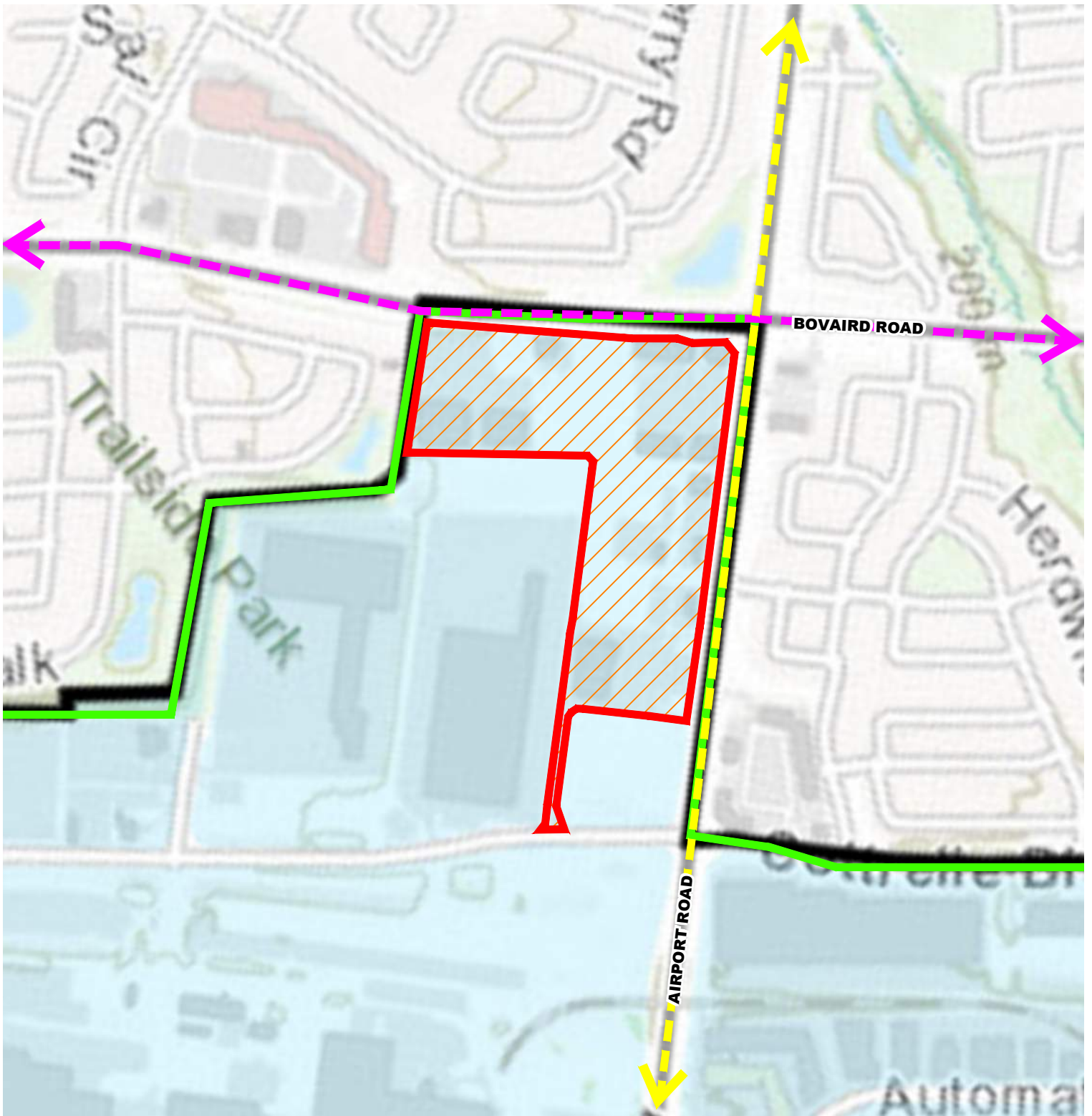


## REGION OF PEEL

### City of Brampton

SmartCentres owns two sites identified within Provincially Significant Employment Area 14 (Pearson Airport Hub) within the City of Brampton. These sites include:

Site Address	Provincially Significant Employment Area	Major Transit Station (within 800 m)	Municipal OP Designation	Rationale for Removal
9920-9990 Airport Road, 2959-2989 Bovaird Dr E (Figure 1)	Yes (Zone 14)	No, however within a planned Intensification Corridor (Airport Road) and along two of the Region's rapid bus (Zuum) routes	Residential and Business Corridor	<p>The subject lands are adjacent to a planned intensification corridor which has been identified by the Brampton Official Plan for further growth and intensification through high-order transit and increased densities. The north parcel along the entire Bovaird Road frontage is designated as residential in the Official Plan. Therefore, limiting the subject lands to Employment Uses will not accurately articulate the existing or planned context of these lands.</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>
30 Coventry Road (Figure 2)	Yes (Zone 14)	Yes, Queen Street (BRT) – Proposed Station Stop at Queen Street and Airport Road.	Service Commercial	<p>The subject lands are within an 800 m radius of a MTSA - planned BRT line (Queen Street).</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>



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

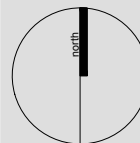
**Figure 1:  
Proposed Provincially  
Significant Employment  
Zones**

**LEGEND**

- Subject Lands
- Proposed Provincially Significant Employment Zones
- Commercial
- L.B.P.I.A Operating Area
- Airport Road Transit Corridor
- Bovaird Road Transit Corridor

DATE: February 28, 2019

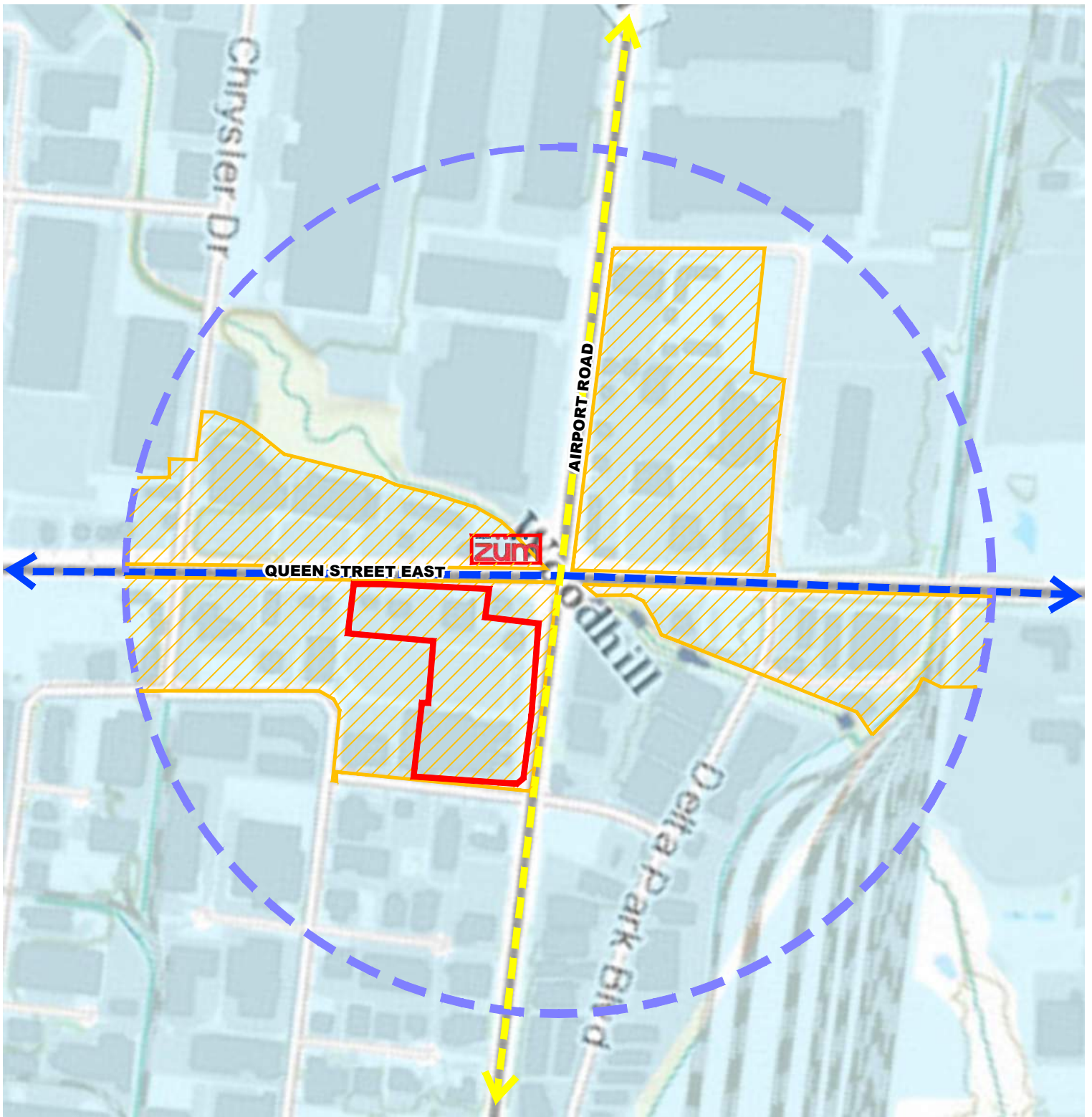
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**9920-9980 Airport Road,  
Brampton, Ontario**

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

**Figure 2:  
Proposed Provincially  
Significant Employment  
Zones**

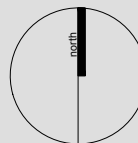
**LEGEND**

- Subject Lands
- Proposed Provincially Significant Employment Zones
- Commercial

- zum Brampton Transit Bus Stop
- ↔ Queen Street Transit Corridor
- ↔ Airport Road Transit Corridor
- ⊙ 800 Metre Radius Around Transit Stations

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**SCALE** 1:10000



**30 Coventry Road,  
Brampton, Ontario**

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City of Mississauga

SmartCentres owns three sites identified within Provincially Significant Employment Area 14 (Pearson airport Hub), 16 (Mavis and Burnhamthorpe) and 18 (Meadowvale) within the City of Mississauga.

Site Address	Provincially Significant Employment Area	Major Transit Station (within 800 m)	Municipal OP Designation	Rationale for Removal
1100 Burnhamthorpe Road West (Figure 3)	Yes (Zone 16)	Yes, Erindale GO Transit Station	Mixed Use within an Employment Area	<p>The purpose and intent of the Mixed Use designation is to encourage a variety of uses. Based on the permitted uses, addition to the subject land is within an MTSA, we believe the subject lands should be removed from the PSEZ as the Provincial policies will limit and not permit the intended uses of these lands within the Urban Built-Up Area of the City of Mississauga.</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>
720-780 Burnhamthorpe Road West (Figure 3)	Yes (Zone 16)	No, but located 1.5 km from Erinadale GO Transit Station	Mixed Use within an Employment Area	<p>The purpose and intent of the Mixed Use designation is to encourage a variety of uses. The property is located 1.5 km from Erindale GO Transit Station and 2.0 km from Downtown Mississauga as identified in the Official Plan and is well served with access to higher order transit such as TTC via MiWay. The proposed inclusion of the site will limit and prevent the intended uses of these lands within the Urban Built-Up Area of the City of Mississauga.</p> <p><b>Therefore, we request the entire southwest corner of Burnhamthorpe Road and Mavis Road be removed to allow for complementary density to integrate with approved growth in the area.</b></p>
3150/3155 Argentia Road (Figure 4)	Yes (Zone 18)	Yes, Lisgar GO Transit Station	Mixed Use within a Corporate Centre	<p>The purpose and intent of the mixed use designation is to encourage a variety of uses.</p>

Site Address	Provincially Significant Employment Area	Major Transit Station (within 800 m)	Municipal Designation	OP Rationale for Removal
				<p>Based on the permitted uses, it is our recommendation the following subject lands be removed from the PSEZ as the Provincial policies will limit and not permit the intended uses of these lands within the Urban Built-Up Area of the City of Mississauga. In addition, the site is within an MTSA.</p> <p><b>Therefore, we request removal from the PSEZ.</b></p>



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

**Figure 3:  
Proposed Provincially  
Significant Employment  
Zones**

**LEGEND**

720-780 Burnhamthorpe Road West

1100 Burnhamthorpe Road West

Mixed-Use (Mississauga Official Plan)

Proposed Provincially Significant Employment Zones

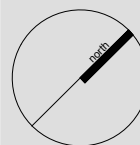
800 Metre Radius Around Transit Stations

Erindale GO Transit Station

Existing Commuter Rail Line

**DATE:** February 28, 2019

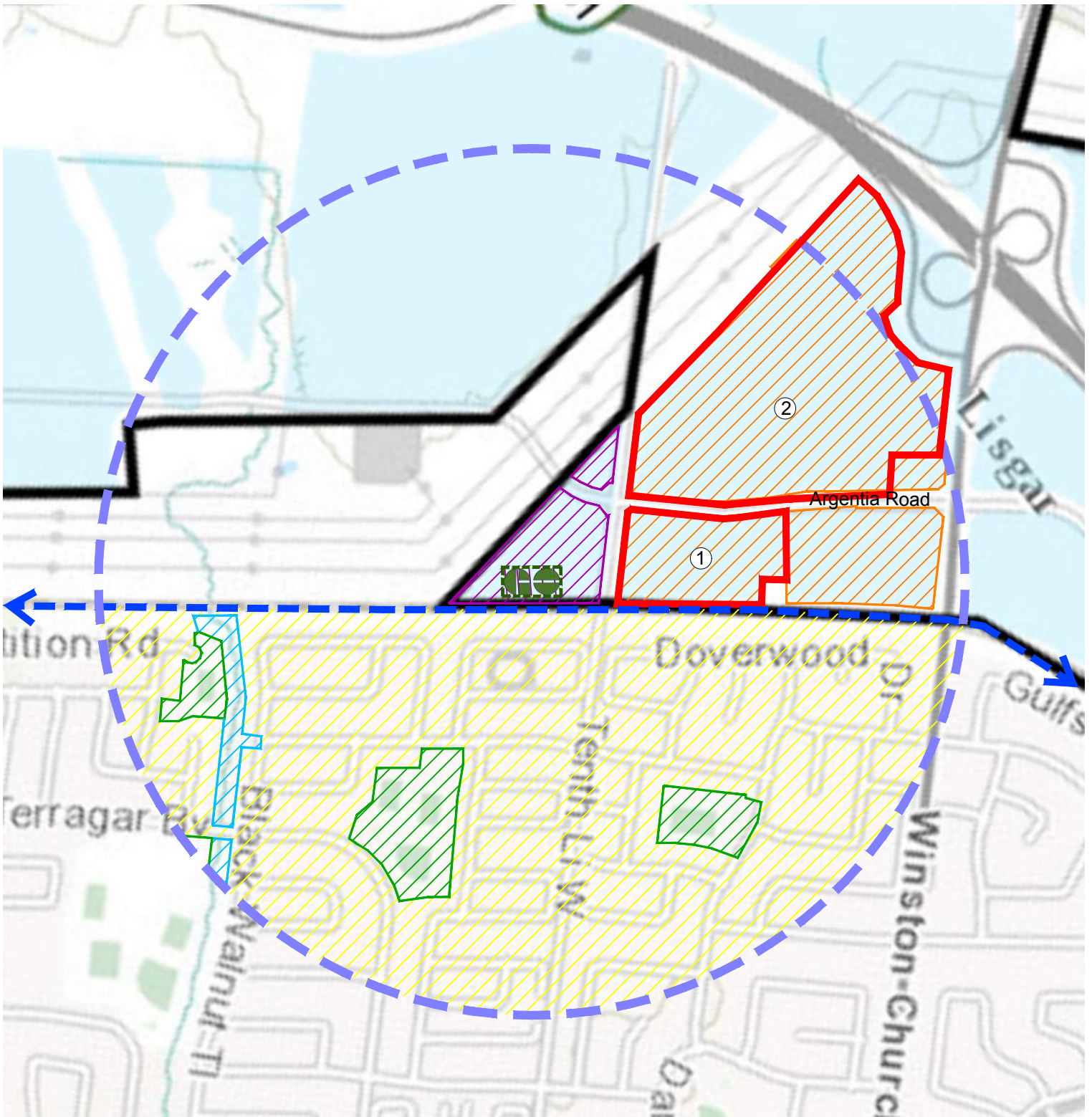
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**720-780 & 1100 Burnhamthorpe  
Road West,  
Mississauga, Ontario**

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

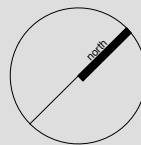
**Figure 4**  
**Proposed Provincially Significant Employment Zone**

**LEGEND**

- 1 3150-3155 Argentia Road
- 2 7330 Winston Churchill Boulevard
- Proposed Provincially Significant Employment Zones
- Lands Designated Business Employment (Mississauga Official Plan)
- Lands Designated Residential Low Density II (Mississauga Official Plan)
- Lands Designated Public Open Spaces (Mississauga Official Plan)
- Lands Designated Greenlands (Mississauga Official Plan)
- 800 Metre Radius Around Transit Stations
- Lisgar GO Transit Station
- Existing Commuter Rail Line

**DATE:** February 28, 2019

**SCALE:** 1:10000



**3150-3155 Argentia Road,  
 Mississauga, Ontario**

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## TORONTO

SmartCentres owns nine sites identified within Provincially Significant Employment Area 8 (Unilever Eastern), 9 (Keele Dufferin), 11 (Highway 400 Corridor), and 13 (427 QEW).

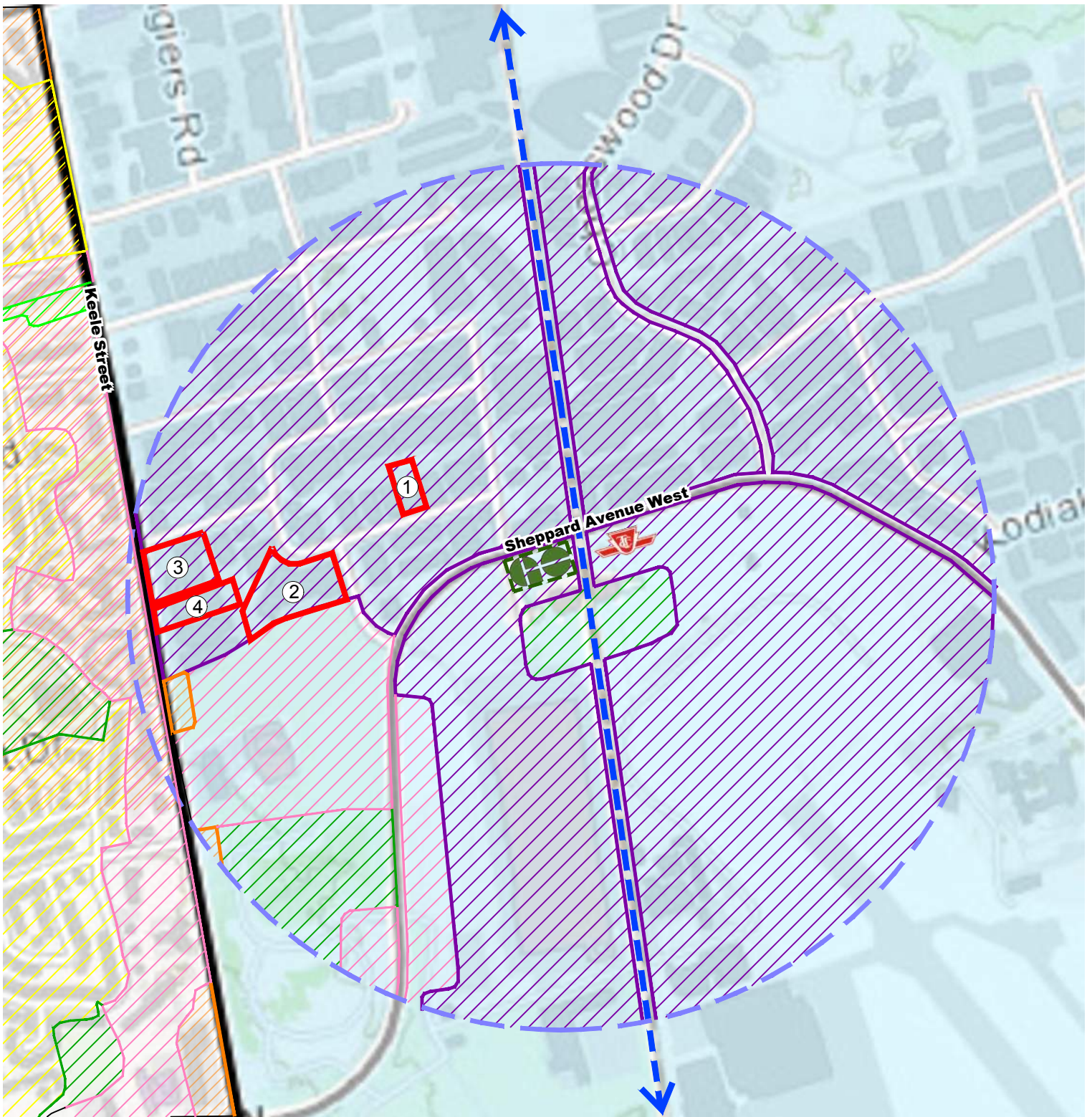
Site Address	Provincially Significant Employment Area	Major Transit Station (within 800 m)	Municipal OP Designation	Rationale for Removal
3675/3685 Keele Street (Figure 5)	Yes (Zone 9)	Yes, Downsview Park GO Transit Station, and Downsview Park TTC Subway Station	Employment Area	<p>The subject lands are located within an 800 m radius of an MTSA – the existing Downsview Park GO Station and TTC subway station. The property is also located adjacent to low and medium density residential uses.</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>
77-81 St. Regis Crescent South (Figure 5)	Yes (Zone 9)	Yes, Downsview Park GO Transit Station, and Downsview Park TTC Subway Station	Employment Area	<p>The subject lands are located 500 m from an MTSA – the existing Downsview Park GO Station and TTC subway.</p> <p>The property is also abutting (on the northwest corner) an undeveloped portion of Downsview Park, currently identified as “Apartment Neighbourhood” in the Downsview Area Secondary Plan, one of the largest intensification areas in the GTA. This presents a significant opportunity to create a complementary interface with the future of the area.</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>
124 St. Regis Crescent (Figure 5)	Yes (Zone 9)	Yes, Downsview Park GO Station	Employment Area	<p>The subject lands are within an 800 m radius of a MTSA – existing Downsview Park GO Station.</p>



Site Address	Provincially Significant Employment Area	Major Transit Station (within 800 m)	Municipal OP Designation	Rationale for Removal
				<b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b>
158/162 North Queen Street (Figure 6)	Yes (Zone 13)	Yes, previously identified West Mall GO Station (Milton GO) and Proposed Bloor-Danforth Line and The West Mall TTC Subway Station	Employment Area	The subject lands are within an 800 m radius of a MTSA – previously identified GO and TTC Stations.  <b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b>
165 North Queen Street (Figure 6)	Yes (Zone 13)	Yes, previously identified West Mall GO Station (Milton GO) and Proposed Bloor-Danforth Line and The West Mall TTC Subway Station	Mixed Use Area	The subject lands are within an 800 m radius of a MTSA – previously identified GO and TTC Stations. In addition, the subject lands are designated as Mixed Use Area in the Toronto which permits a wide range of commercial, residential and institutional uses. Furthermore, the Sherway Area Study envisions the area be permitted  <b>Therefore, we request removal from the PSEZ due to the existing Mixed Use designation and to implement increased density and investment with a mix of uses within a MTSA.</b>
1581/1585/1589 The Queensway (Figure 7)	Yes (Zone 13)	No, however identified along a Transit Priority Segment (The Queensway)	Employment Area	The subject lands are adjacent to a planned transit corridor which has been identified by the Toronto Official Plan for further growth and intensification through high-order transit and increased densities. Furthermore, the site and surrounding area do not

Site Address	Provincially Significant Employment Area	Major Transit Station (within 800 m)	Municipal OP Designation	Rationale for Removal
				<p>represent an employment area which warrants provincial protection in our opinion.</p> <p><b>Therefore, we request removal from the PSEZ.</b></p>
695 Wilson Avenue (Figure 8)	Yes (Zone 9)	Yes, Wilson TTC Subway Station	Employment Area	<p>The subject lands are within an 800 m radius of a MTSA – existing Wilson TTC Subway Station. Further Mixed Use designations exist to the immediate west and to the east (across Allen Road) which are being developed for mixed use / residential land uses.</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>
2625A Weston Road (Figure 9)	Yes (Zone 11)	N/A	Employment Area	<p>The subject lands are adjacent to retail, residential and Highway 401, though not within an MTSA. The surrounding and existing context should not be classified as a PSEZ. The proposed mapping does not articulate the existing condition on site.</p> <p><b>Therefore, we request removal of the entire southwest corner of Weston Road and Highway 401 be removed from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>
629 Eastern Avenue (Figure 10)	Yes (Zone 8)	Yes, TTC Queen Street Car (Transit Corridor), approved Carlaw TTC Relief Line Station, and.	Employment Area	<p>The subject lands are within an 800 m radius of a MTSA – existing Queen Street Car (Transit Corridor) and under 400m from the proposed Carlaw TTC Relief Line</p>

Site Address	Provincially Significant Employment Area	Major Transit Station Area (within 800 m)	Municipal OP Designation	Rationale for Removal
		planned Unilever SmartTrack Station		<p>Station. The property is also located approximately 800m from the planned Unilever GO SmartTrack Station.</p> <p>The property represents a significant area that remains in Downtown Toronto that possesses a unique opportunity to create a true mixed use community located within higher order transit.</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>



Data Source: First base Solutions Aerial Flown 2018

**Figure 5**  
**Proposed Provincially Significant Employment Zones**

**LEGEND**

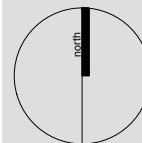
- 124 St. Regis Crescent
- 77 St. Regis Crescent South
- 695 Wilson Avenue
- 3675 Keele Street
- Proposed Provincially Significant Employment Zones

- Lands Designated Employment Areas (Toronto Official Plan)
- Lands Designated Mixed-Use Areas (Toronto Official Plan)
- Lands Designated Neighbourhoods (Toronto Official Plan)
- Lands Designated Parks (Toronto Official Plan)
- Lands Designated Other Open Space Areas (Toronto Official Plan)

- Lands Designated Apartment (Toronto Official Plan)
- 800 Metre Radius Around Transit Stations
- Downsview Park GO Station
- Downsview Park Subway Station

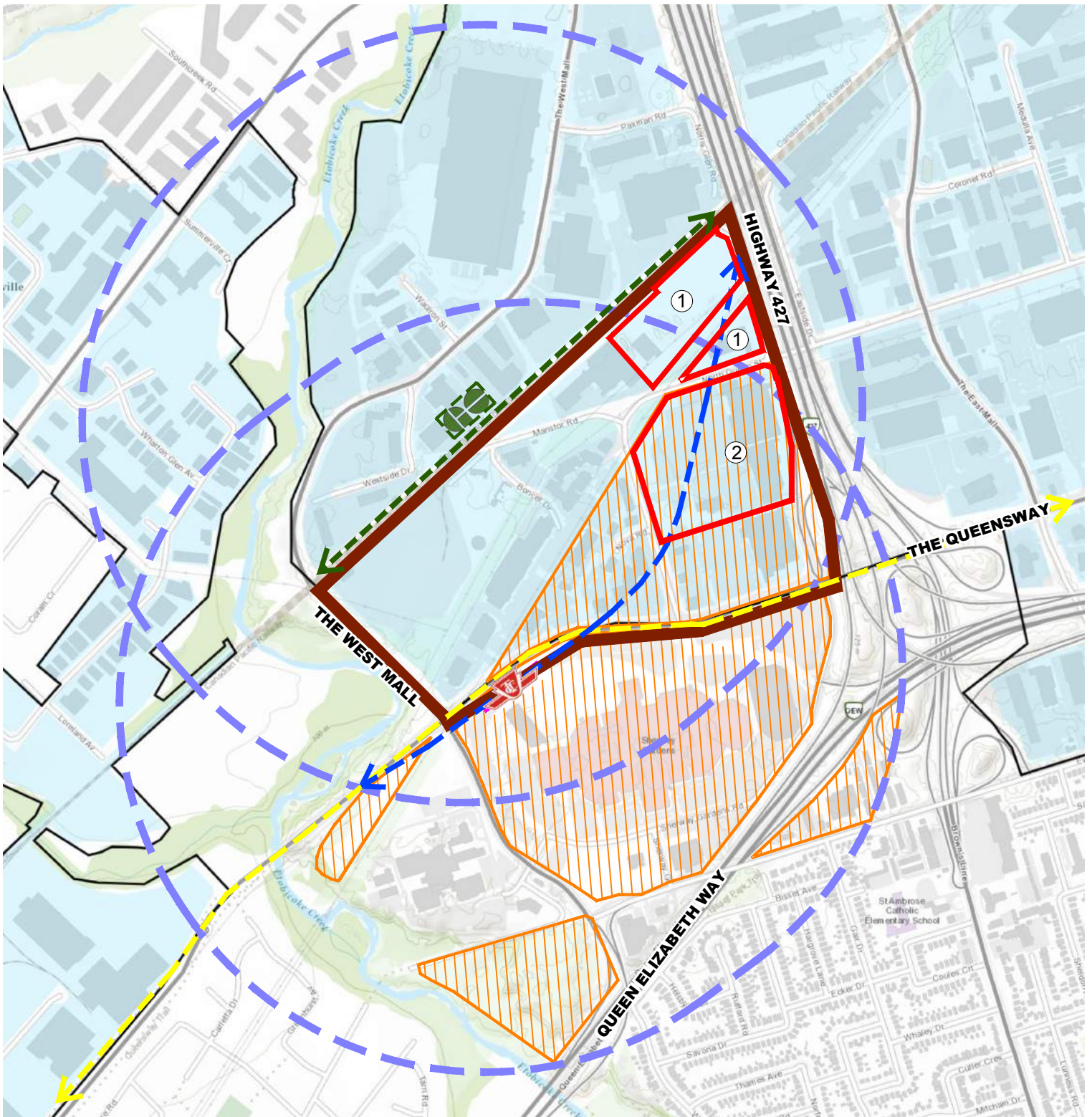
DATE: February 28, 2019

SCALE 1:10000



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

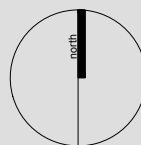
**Figure 6**  
**Proposed Provincially Significant Employment Zones**

**LEGEND**

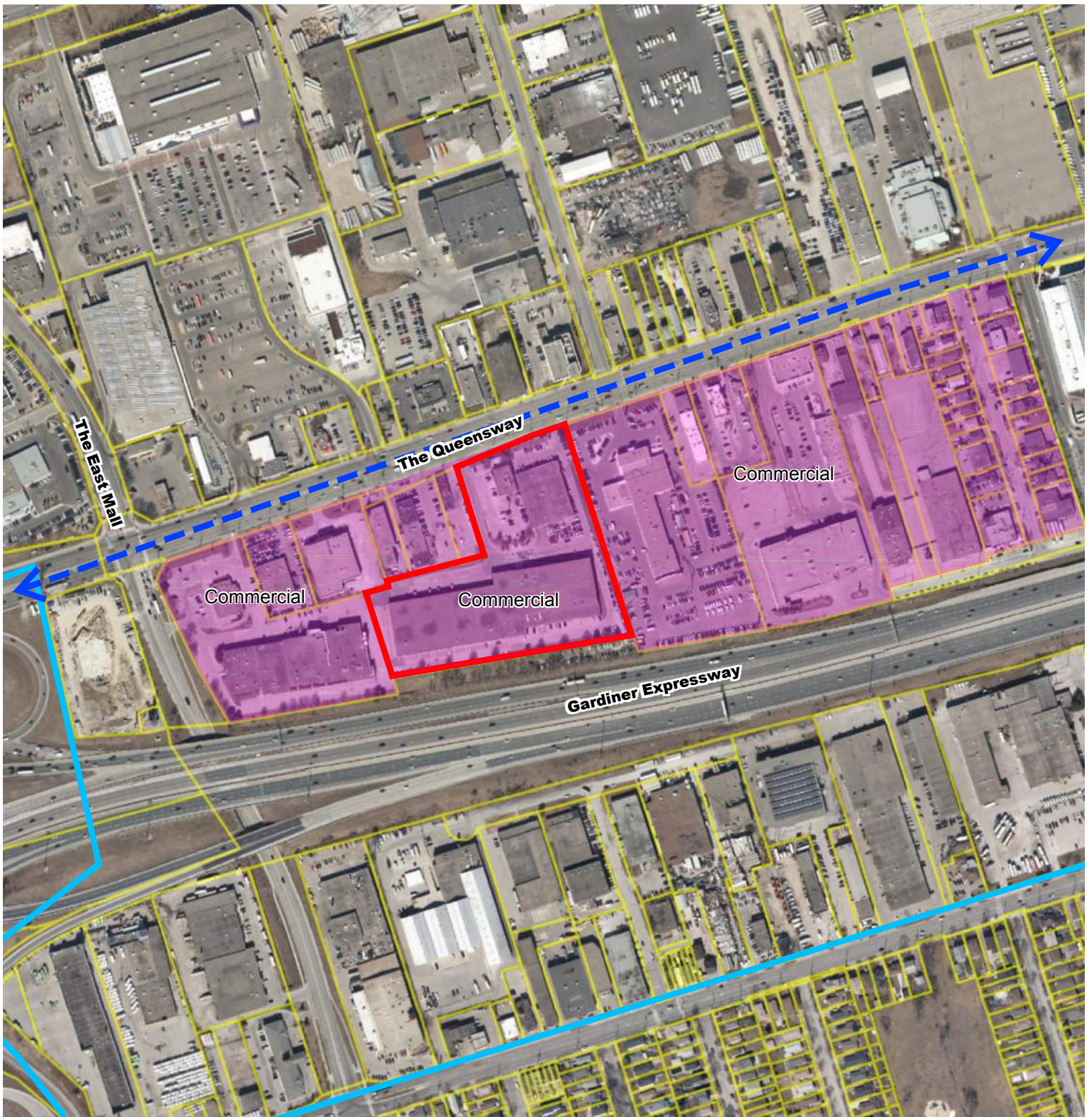
- 1 158/162 North Queen Street
- 2 165 North Queen Street
- Proposed Provincially Significant Employment Zones
- Lands to be Removed from PSEZ
- Lands Designated Mixed-Use Areas (Toronto Official Plan)
- Lands Designated Employment Areas (Toronto Official Plan)
- 800 Metre Radius Around Transit Stations
- 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 1:12,000




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


**Figure 7**  
**Proposed Provincially Significant Employment Zones**

**LEGEND**

 Subject Lands

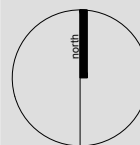
 Proposed Provincially Significant Employment Zones

 Mixed-Use

 The Queensway Transit Priority Segment

**DATE:** February 28, 2019

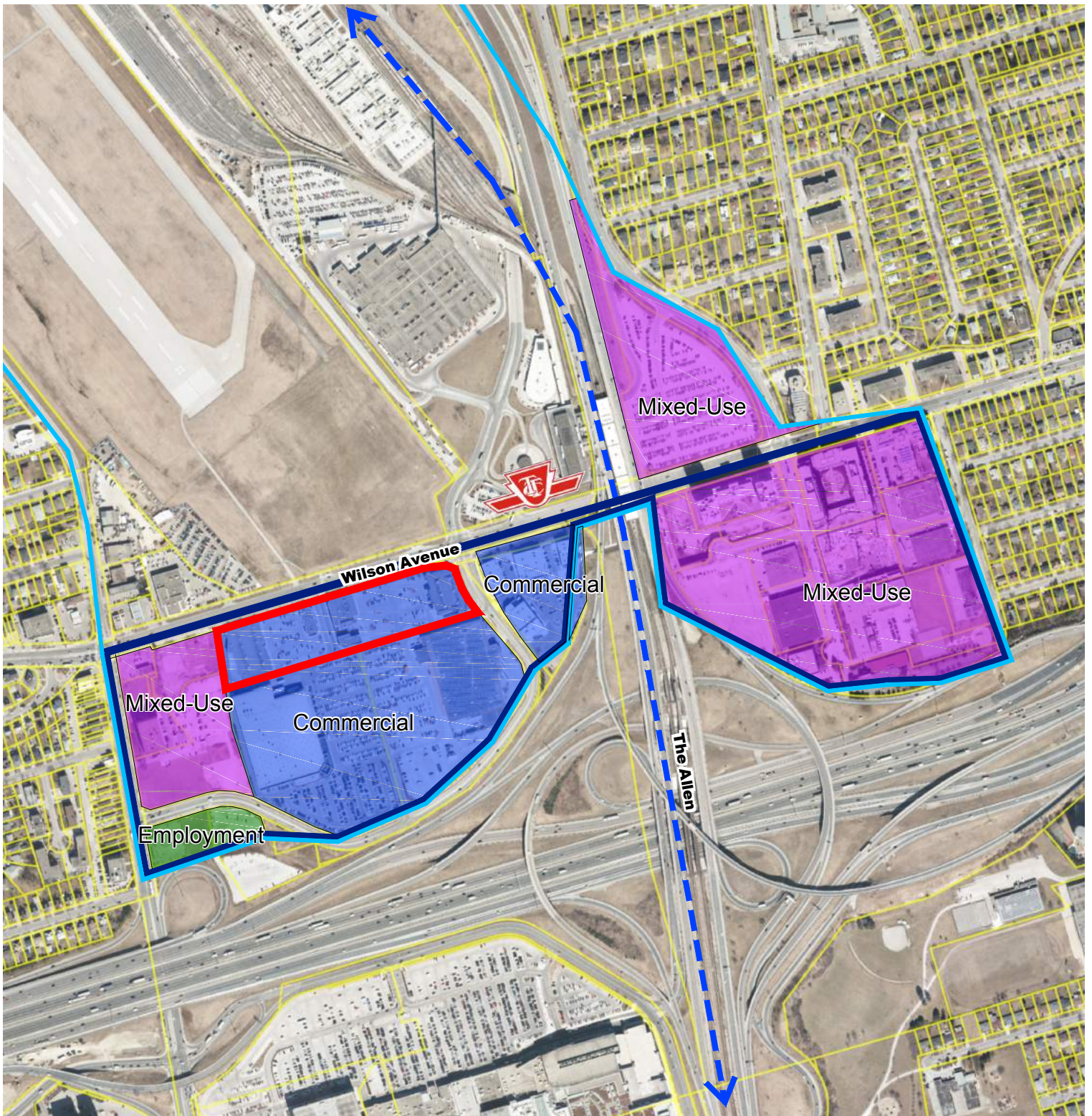
**SCALE:** 1:5000



**1581, 1585, & 1589 The Queensway**  
**Toronto, Ontario**

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

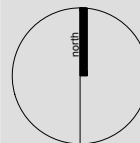
**Figure 8**  
Proposed Provincially Significant Employment Zones

**LEGEND**

- ▭ Subject Lands
- Proposed Provincially Significant Employment Zones
- Commercial Lands
- Mixed Used Lands
- Employment
- Lands to be Removed from PSEZ
- ↔ Existing Commuter Rail Line
- ↘ Wilson Subway Station

**DATE:** February 27, 2019

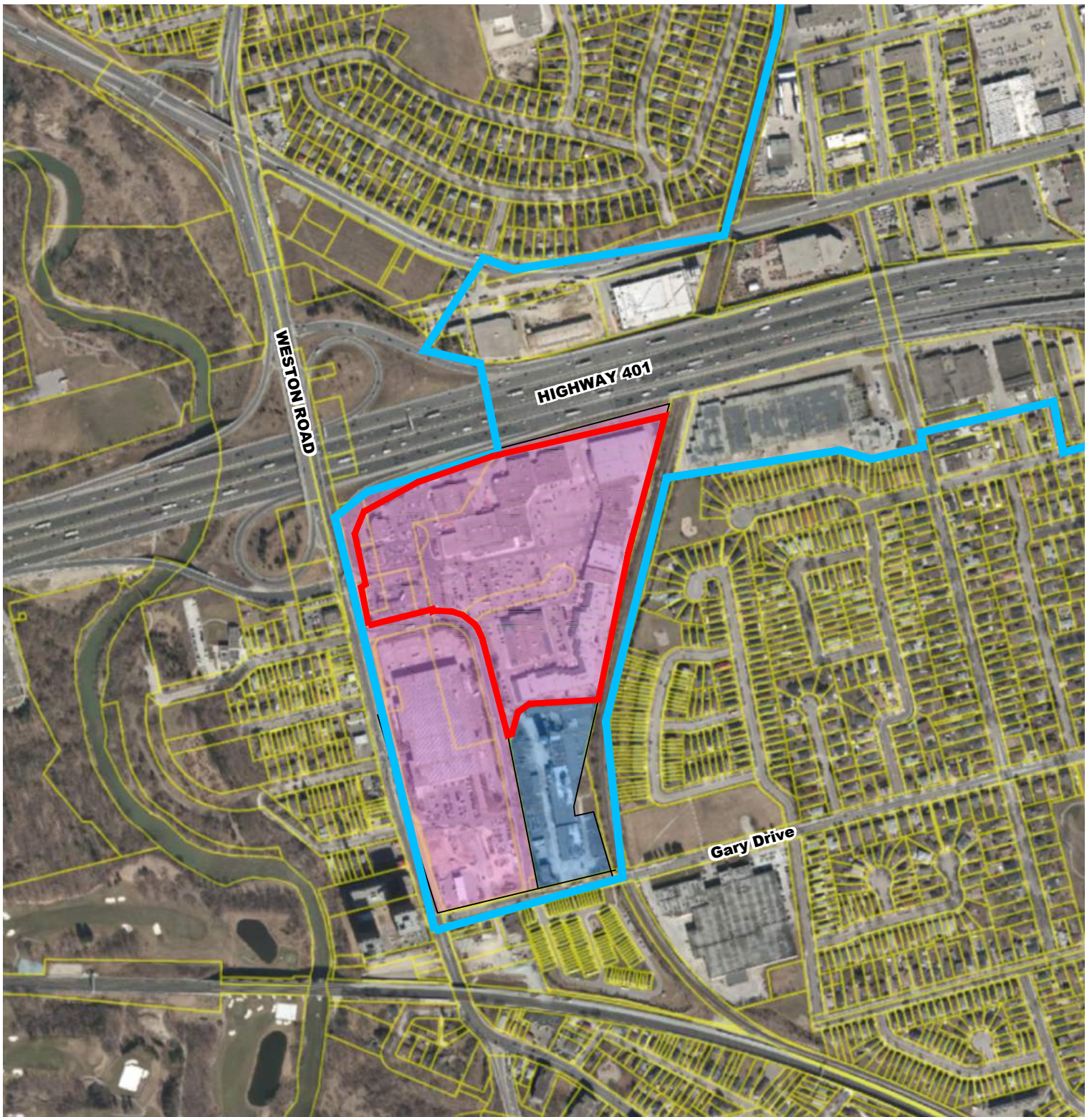
**SCALE:** 1:7500



**695 Wilson Avenue,  
Toronto, Ontario**

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Data Source: First Base Solutions Aerial Flown 2018

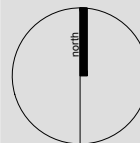
**Figure 9**  
**Proposed Provincially Significant Employment Zones**

**LEGEND**

- 2625A Weston Road
- Proposed Provincially Significant Employment Zones
- Commercial
- Former Industrial Subject to Conversion Request Under OPA 231

**DATE:** February 28, 2019

**SCALE:** 1:7500

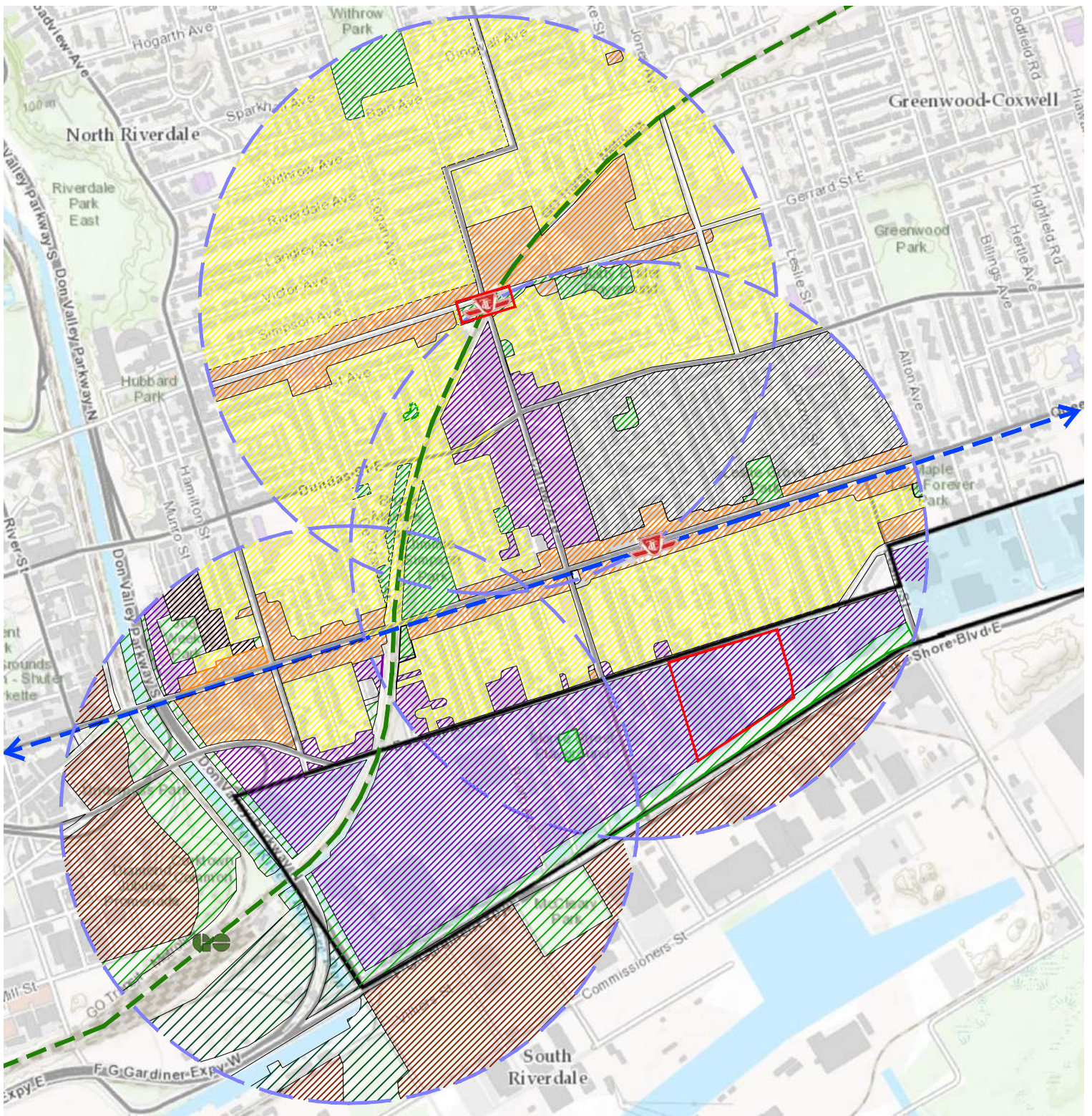


**2625A Weston Road,  
 Toronto, Ontario**

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

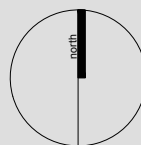
**Figure 10**  
**Proposed Provincially Significant Employment Zones**

**LEGEND**

- 629 Eastern Avenue
- Proposed Provincially Significant Employment Zones
- Lands Designated Employment Areas (Toronto Official Plan)
- Lands Designated Mixed-Use Areas (Toronto Official Plan)
- Lands Designated Neighbourhoods (Toronto Official Plan)
- Lands Designated Parks (Toronto Official Plan)
- Lands Designated Regeneration Areas (Toronto Official Plan)
- Lands Designated Apartment Neighbourhoods (Toronto Official Plan)
- 800 Metre Radius Around Transit Stations
- Lands Designated Natural Areas (Toronto Official Plan)
- TTC Queen Street Car
- TTC Smart Track Station
- Unilever GO/ Broadview Relief
- Exiting Relief Line

**DATE:** February 28, 2019

**SCALE:** 1:15000



**629 Eastern Avenue,**  
**Toronto, Ontario**

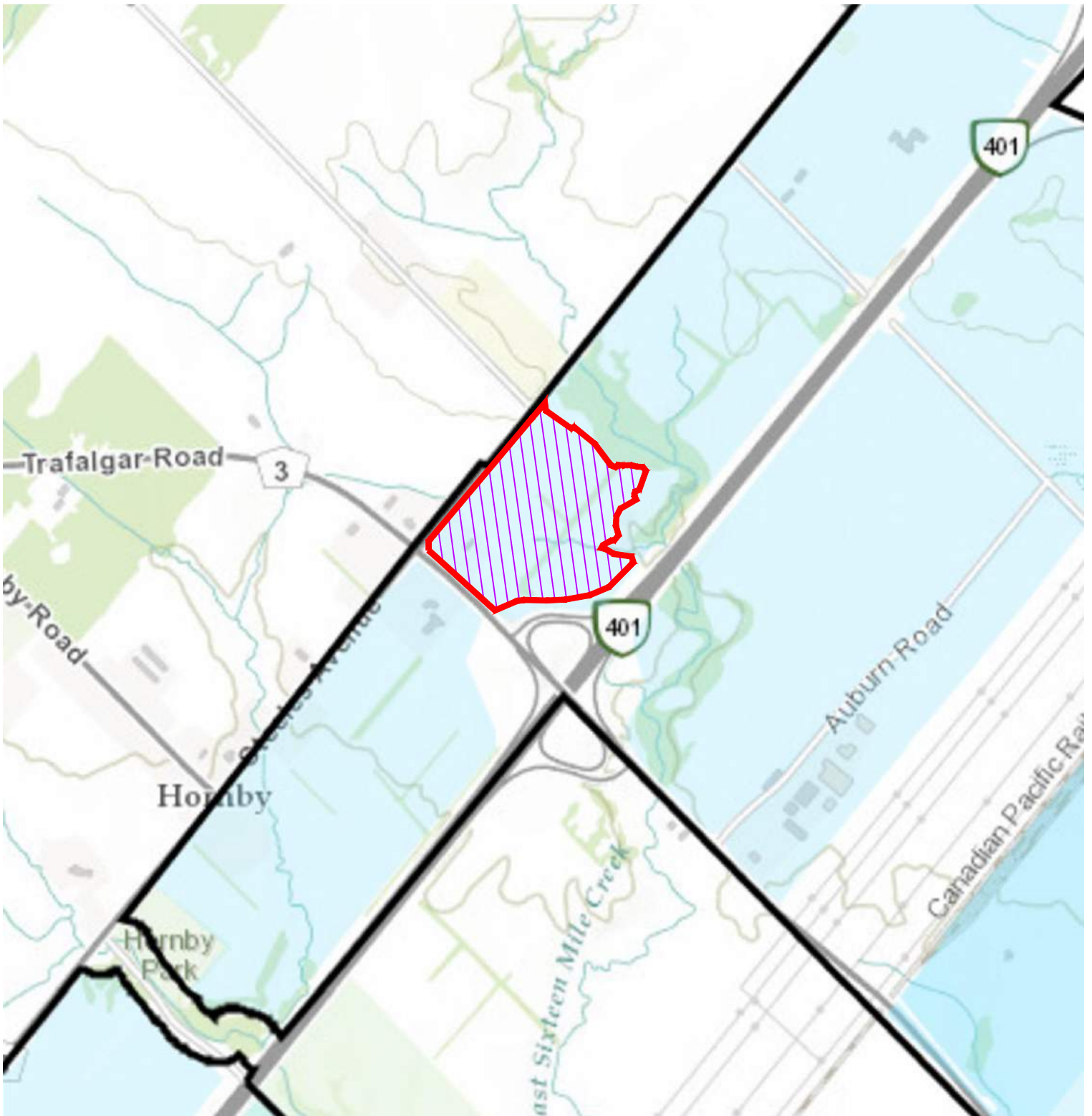
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## HALTON HILLS

SmartCentres owns one site identified within Provincially Significant Employment Area 18 (Meadowvale), which we are recommending removal from the PSEZ.

Site Address	Provincially Significant Employment Area	Major Transit Station Area (within 800 m)	Municipal OP Designation	Rationale for Removal
13850 Steeles Avenue (Figure 11)	Yes (Zone 18)	N/A	Gateway Area	<p>The property is also known as the Toronto Premium Outlet Mall, located adjacent to Highway 401. Based on the existing use we believe designating this site as PSEZ is not appropriate as the PSEZ designation should be reserved for major employment and / or heavy industrial uses.</p> <p><b>Therefore, we request removal from the PSEZ.</b></p>



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

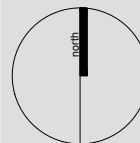
**Figure 11**  
Proposed Provincially Significant Employment Zones

**LEGEND**

- 13850 Steeles Avenue West
- Proposed Provincially Significant Employment Zones
- Commercial

**DATE:** February 28, 2019

**SCALE** 1:15000



**13850 Steeles Avenue West**  
**Halton Hills, Ontario**

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## YORK REGION

### Markham

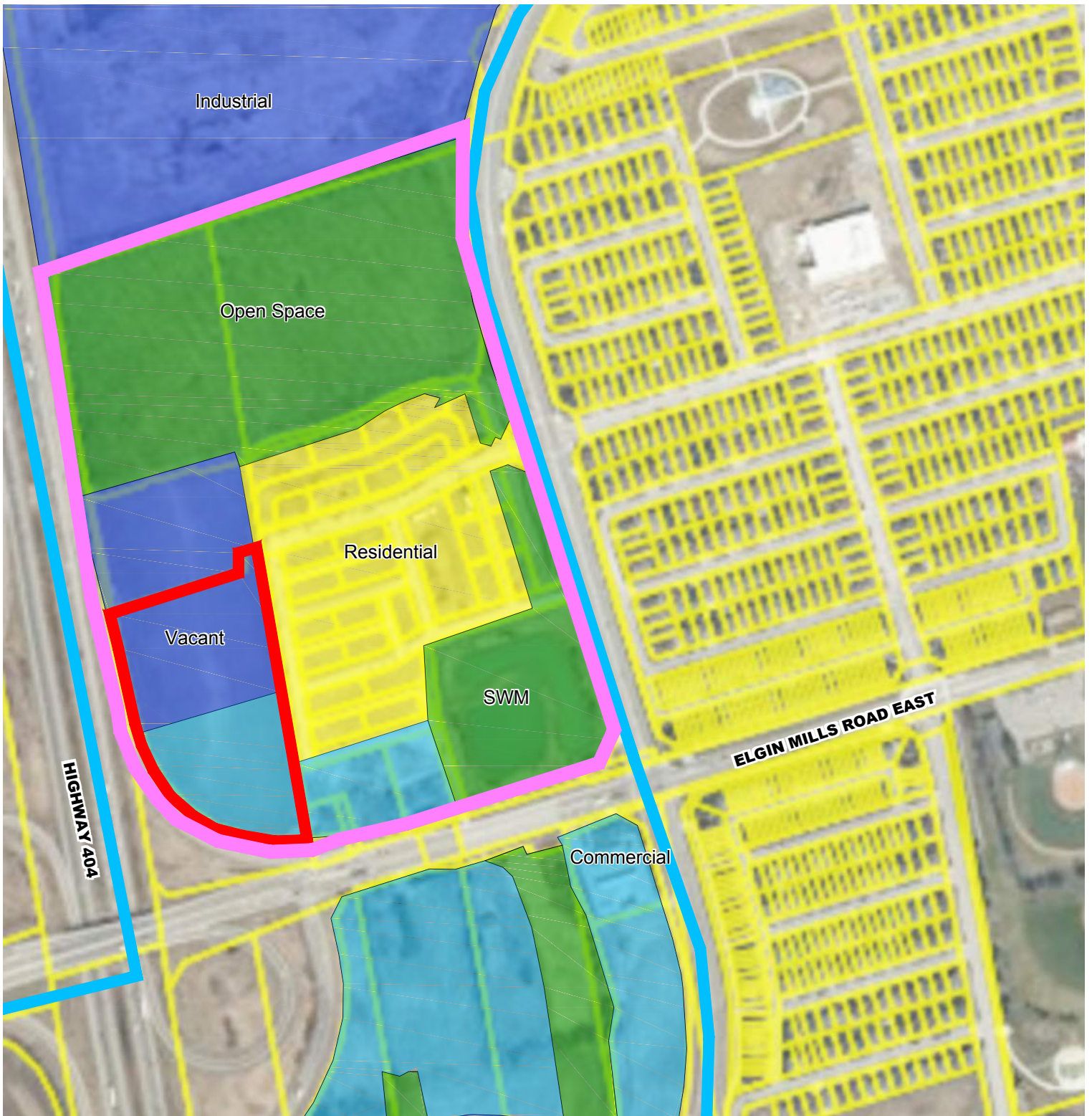
SmartCentres owns one site identified within Provincially Significant Employment Area 7 (404 407).

Site Address	Provincially Significant Employment Area	Major Transit Station Area (within 800 m)	Municipal OP Designation	Rationale for Removal
N/A  Vacant Lands located on the NE corner of HWY 404 & Elgin Mills (Figure 12)	Yes (Zone 7)	N/A	Business Employment Park	<p>The subject land is located in between the east side of Hwy 404 and an existing low rise residential townhouse neighbourhood. Though lands adjacent to Provincial Highways are typically designated employment lands, access to the property is provided through the townhouse block, which does not logistically lend itself to employment uses.</p> <p>It should be noted that the City of Markham have designated a number of key areas as significant employment lands to support the employment growth of the City through the development of planned employment lands.</p> <p><b>There, we request removal from the PSEZ.</b></p>

### Vaughan

SmartCentres owns one site identified within Provincially Significant Employment Area 15 (HWY 50 Corridor).

Site Address	Provincially Significant Employment Area	Major Transit Station Area (within 800 m)	Municipal OP Designation	Rationale for Removal
55 New Huntington Road (Figure 13)	Yes (Zone 15)	Yes, VIVA Rapid Transit HWY 427	Employment Areas and Regional Intensification Corridors within Employment Areas	<p>The subject lands are within an 800 m radius of a MTSA - planned Rapid Transit Terminal (VIVA HWY 427).</p> <p><b>Therefore, we request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>



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

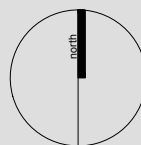
**Figure 12:  
Proposed Provincially  
Significant Employment  
Zones**

**LEGEND**

- Subject Lands
- Proposed Provincially Significant Employment Zones
- Business Park Employment
- Greenway
- Lands to be Removed from PSEZ
- Service Employment
- Residential Low Rise

**DATE:** February 28, 2019

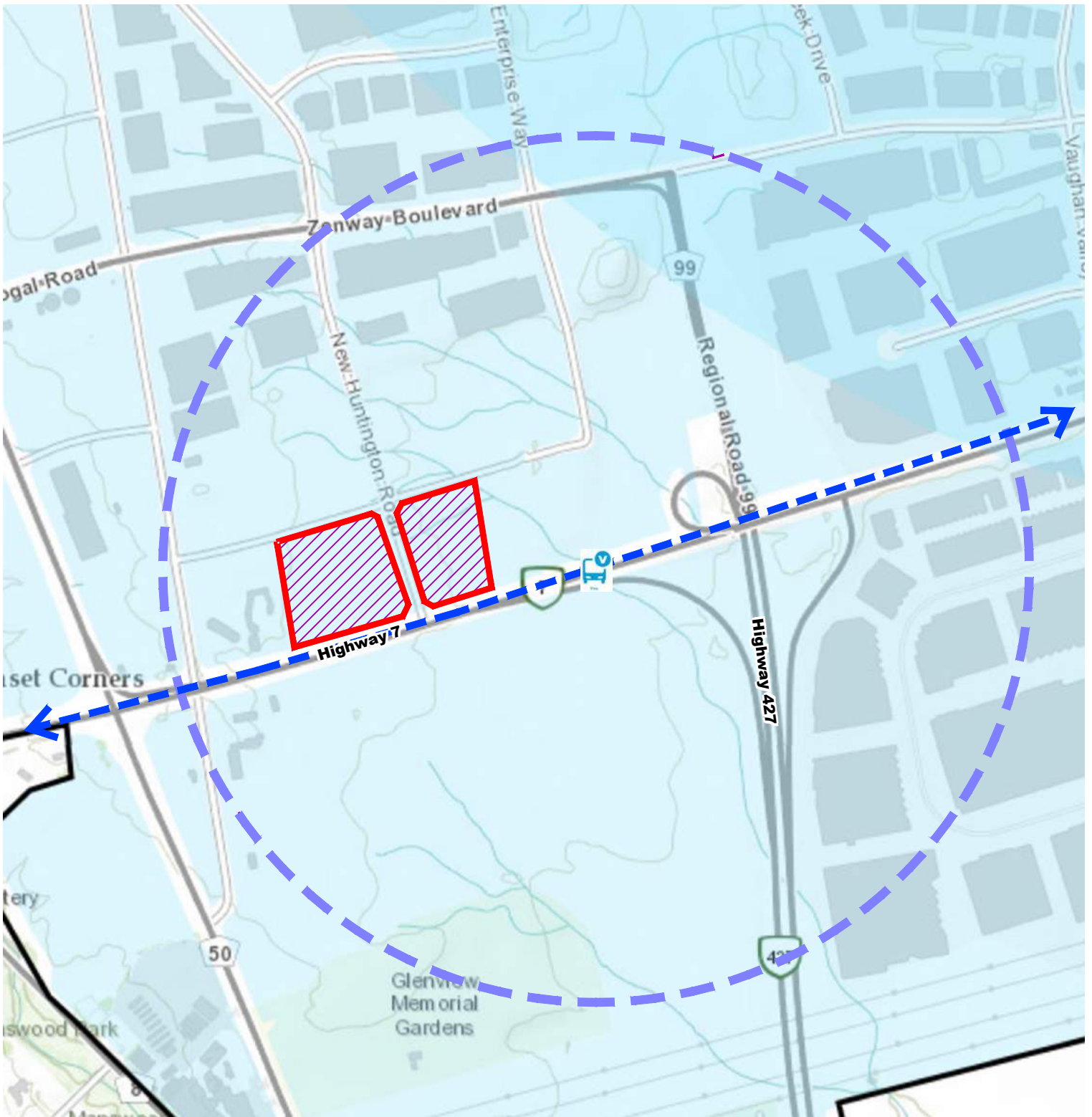
**SCALE** 1:5000



**Markham, Ontario**

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



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

**Figure 13**  
**Proposed Provincially Significant Employment Zones**

**LEGEND**

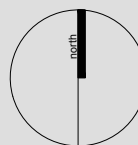
-  55 New Huntington Road
-  Proposed Provincially Significant Employment Zones
-  Lands Designated Commercial (Vaughan Official Plan)
-  Proposed Highway 7 Rapid Transit Corridor



Proposed Viva Terminal

DATE: February 28, 2019

SCALE 1:10000



**55 New Huntington Road,  
 Vaughan, Ontario**

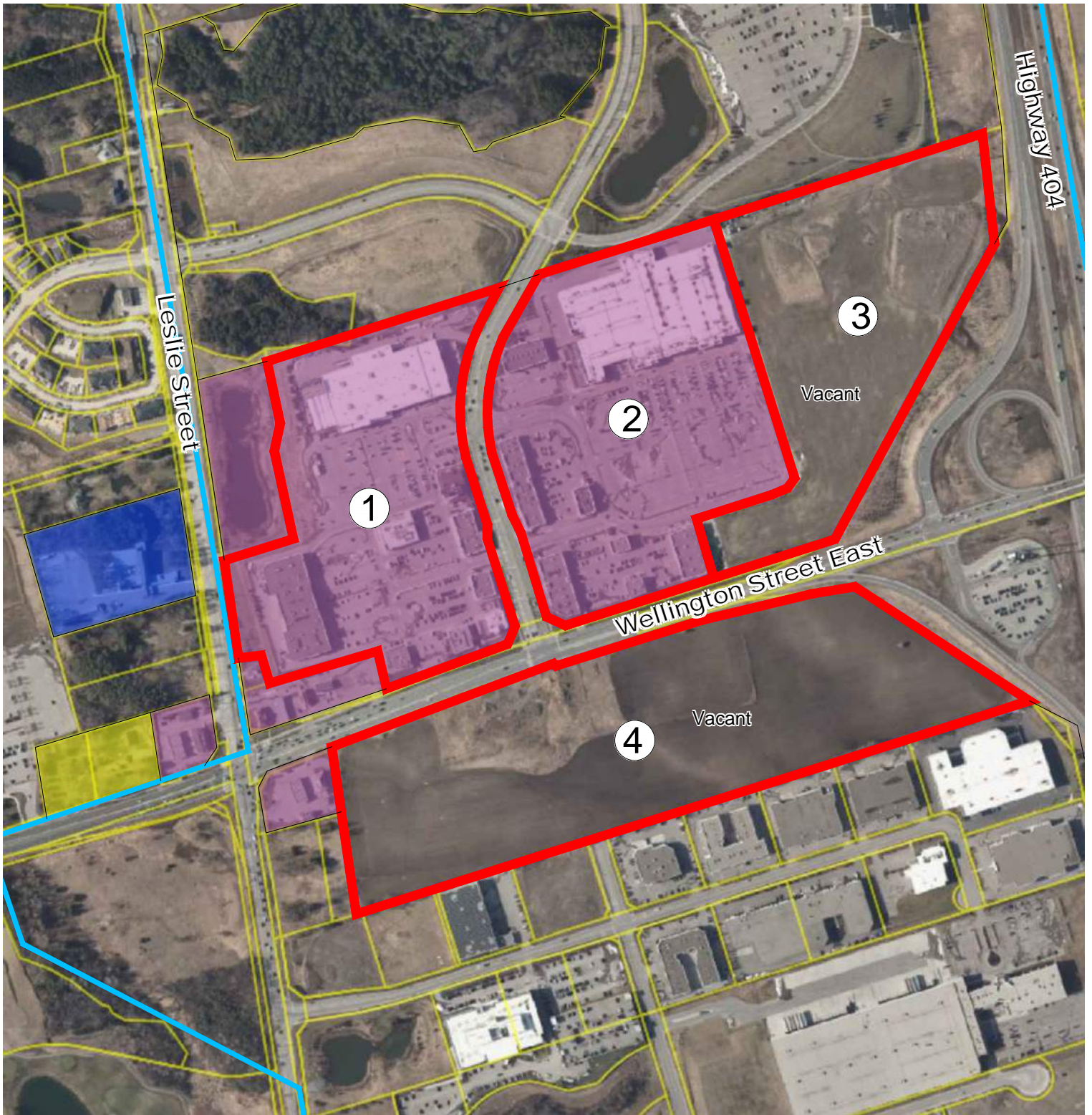
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## Aurora

SmartCentres owns three sites not currently identified within a Provincially Significant Employment Area, though recommendations to include them were proposed by York Region and the Town of Aurora.

Site Address	Provincially Significant Employment Area	Major Transit Station Area (within 800 m)	Municipal OP Designation	Rationale for Removal
135/140/157 First Commerce Drive (Figure 14)	No	N/A	Business Park	<p>Although the property is designated as Employment, site specific provisions permit for commercial-retail uses on 135/140 First Commerce Drive. We do not believe the lands play a strategic employment role within the Greater Golden Horseshoe.</p> <p><b>Therefore, we recommend maintaining the current proposed mapping of the PSEZ as it does not meet the criteria</b></p>
1623 Wellington Street East (Figure 14)	No	N/A	Business Park	<p>Although the lands are currently designated as Employment, site specific limits the type of commercial use and does not play a strategic employment role within the Greater Golden Horseshoe.</p> <p><b>Therefore, we recommend maintaining the current proposed mapping of the PSEZ as it does not meet the criteria.</b></p>



Data Source: Regional Municipality of York Proposed Provincially Significant Employment Zones (2019)

**Figure 14**  
**Proposed Employment Zones**

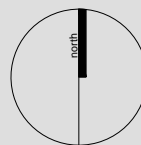
**LEGEND**

- 1 140 First Commerce Drive
- 2 135 First Commerce Drive
- 3 157 First Commerce Drive
- 4 1623 Wellington Street East

- Recommended Employment Areas to PSEZ by York Region
- Commercial Lands
- Residential
- Institutional

**DATE:** February 28, 2019

**SCALE** 0.162578



**Town of Aurora, Ontario**

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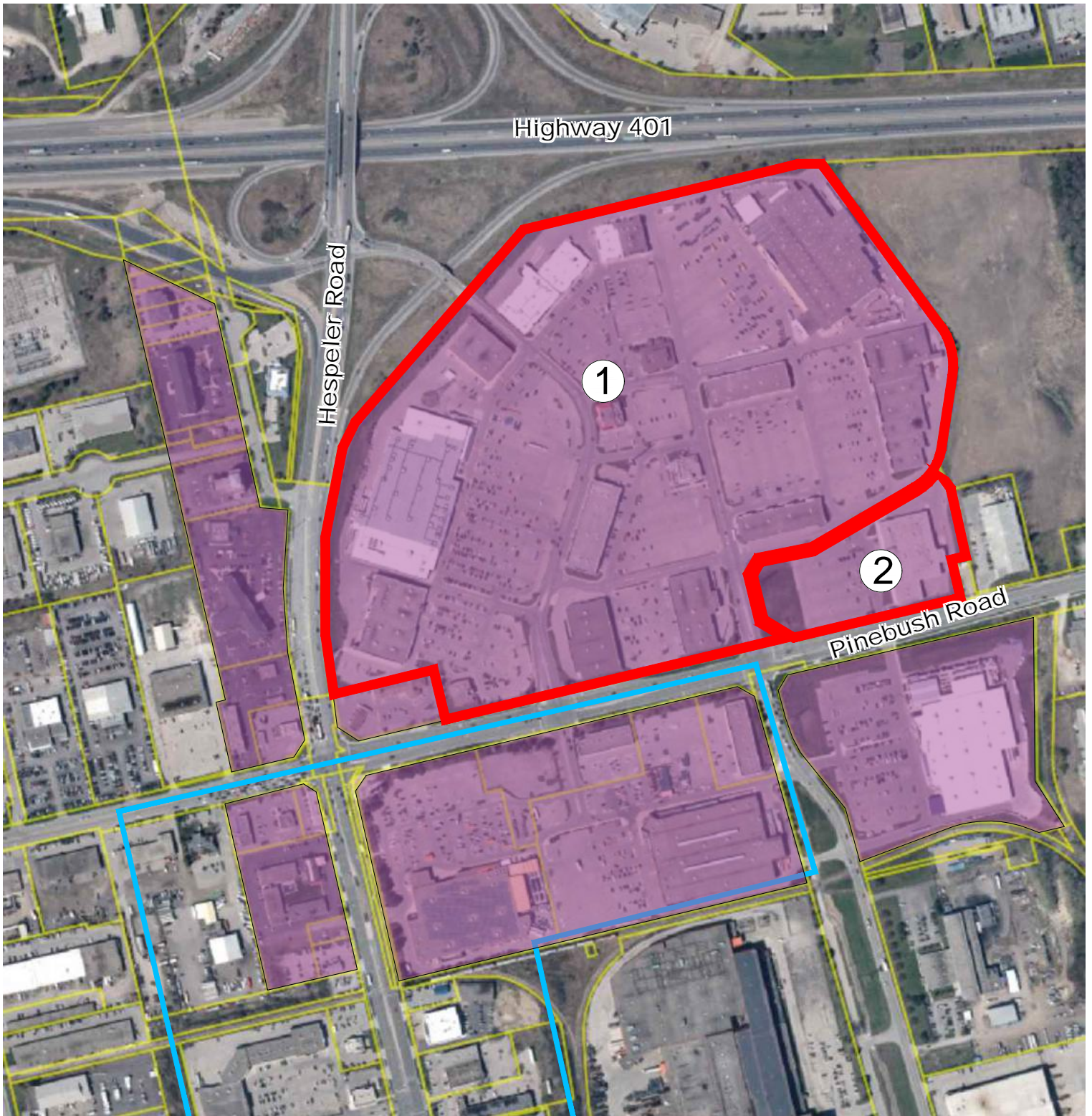


## REGION OF WATERLOO

### Cambridge

SmartCentres owns one site identified within Provincially Significant Employment Area 22 (Cambridge East).

Site Address	Provincially Significant Employment Area	Major Transit Station Area (within 800 m)	Municipal OP Designation	Rationale for Removal
22 and 90 Pinebush Road (Figure 15)	Yes (Zone 22)	No, however along an existing transit network (RMW) and within 400m of the planned ION light rail system (Current in Stage 2)	Regional Commercial; Site Specific Policies	<p>These lands are under review by the City for intensification. Further, the City recently endorsed a conversion to residential to settle an LPAT appeal on the lands abutting to the east of the site. Both the City and Region support removing the site from the PSEZ.</p> <p><b>We request removal from the PSEZ to implement increased density and investment with a mix of uses within a MTSA.</b></p>



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

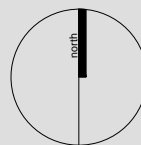
**Figure 15**  
**Proposed Provincially Significant Employment Zones**

**LEGEND**

- 1 22 Pinebush Road
- 2 90 Pinebush Road
- Proposed Provincially Significant Employment Zones
- Commercial Lands

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**SCALE:** NTS



**22 & 90 Pinebush Road ,  
 Cambridge, Ontario**

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 28 Feb 2019 - [Cambridge].dwg

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## **SUMMARY**

As noted above, we are appreciative and supportive of the Province reviewing the current policy regime to enhance and protect employment lands within the Province of Ontario. We request that should the mapping be modified that additional consultation is undertaken to ensure the mapping is accurate.

We hope our formal submission in response to the Environmental Bill of Rights Notice is received and considered by the Province.

Respectfully Submitted,

SMARTCENTRES REIT