

**Posted Online (to Environmental Registry Ontario)**

28 February 2019

Charles O'Hara  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
777 Bay Street  
c/o Business Management Division, 17th floor  
Toronto, ON M5G 2E5

Dear Mr. O'Hara:

**Re: Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017*  
(ERO # 013-4504)**

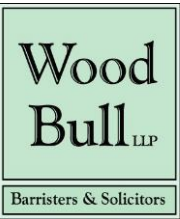
**Submissions by Slate Asset Management**

We represent Slate Asset Management (“Slate”), the owner and property manager of numerous office, industrial, and retail properties in Ontario. These properties include multi-storey office and retail buildings in the City of Toronto including properties located at the corner of Yonge and St. Clair, 2323 Yonge Street, and 1 Eva Road, as well as mixed use properties within the City of Hamilton (the “Slate Sites”).

On behalf of Slate, we have reviewed the Province’s proposal noted above as it applies to the Slate Sites and submit the following comments for the Minister’s consideration. Slate would welcome an opportunity to discuss these comments with the Minister’s office, and would be pleased to provide additional information about the Slate Sites if it would assist in considering the requests made in this submission.

**Submissions**

Slate is encouraged by the recognition in the *Growth Plan for the Greater Golden Horseshoe, 2017* that major transit station areas represent important intensification opportunities for municipalities, and should be considered for a higher density mix of uses in order to support public transit infrastructure, and further, that other strategic growth areas are also to be considered for development opportunities. However, proposed policy 2.2.5.14, which requires that “*outside of employment areas, the redevelopment of any employment lands should retain space for a similar number of jobs to remain accommodated on site*”, has the potential to detract from the intensification opportunities that the Growth Plan identifies.



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Slate submits that, as drafted, policy 2.2.5.14 is overly vague (what does “similar number of jobs” mean?) and in addition, is not sufficiently flexible to allow consideration site specific constraints when determining the number of replacement jobs to be included in a redevelopment. For example, there may be instances where some existing office jobs can be replaced within a new mixed-use development, however, due to urban design constraints, it would be desirable to allow a reduction in those jobs to permit an intensified mix of uses. Furthermore, in some circumstances, it may be desirable to allow jobs to be replaced off site. Unfortunately, no flexibility has been included within policy 2.2.5.14 to allow these considerations to take place, and therefore to promote context sensitive development.

In Slate’s submission, policy 2.2.5.14 should be modified to introduce flexibility as noted above, which modifications might include:

1. allowing a reduction or elimination of the jobs to be replaced in consideration on certain criteria, which might include:
  - a. the viability of the jobs on site;
  - b. the achievement of urban design or cultural heritage objectives;
  - c. the achievement of a complete community; and
  - d. density optimization.
2. allowing the jobs to be replaced off site, where appropriate; and
3. allowing the jobs to be replaced within a phased timeframe.

Thank you in advance for your consideration of these matters.

Yours very truly,

**Wood Bull LLP**

A handwritten signature in blue ink, appearing to read "Jshapira", is written over the typed name.

Johanna R. Shapira

JRS/af

c. Client