



Comments on the review of  
proposed policies adapted from  
A Place to Grow and Provincial  
Policy Statement to form a new  
provincial planning policy  
instrument.

Groupe MACH Inc.

AUGUST 3, 2023  
GROUPE MACH  
600-630, St. Paul Street W. Montreal QC H3C 1L9





**Who is MACH** ----- 3

**Context** ----- 4

**Generate an appropriate housing supply** ----- 5

**Provide infrastructure to support development** ----- 6

**Conclusion** ----- 7

**Annex 1 - Properties List** ----- 8



# Who is MACH

---

Founded in 2000, Groupe MACH has never ceased to surpass itself. Its real estate projects are adapted to the challenges of our time: inclusive, sustainable and in harmony with their communities. Today, MACH is one of the leading private real estate owners and developers in Canada.

Its ability to anticipate trends and respond quickly and effectively to the ever-changing marketplace allows it to create, develop and manage living and working environments, commercial spaces and entertainment venues designed to enhance the quality of life of their occupants and users. MACH does so with passion, in an innovative, responsible and thoughtful manner. It imposes the utmost rigour on itself and adheres to best practices in governance and sustainable development.

In addition to property management and development - MACH has over 15 million square feet of projects on its drawing boards - its integrated approach includes real estate services and construction. By building strong partnerships with experienced professionals, it maintains high standards in an efficient, practical and realistic manner. MACH has won numerous national and international awards for its innovation in sustainability, design and construction quality. Representing more than 40 M square feet, its real estate portfolio includes more than 250 properties. In recent months, MACH has made a powerful entrance into the Ontario market acquiring 23 properties totaling 5.5 M square feet with its most recent acquisition of One60 Elgin in downtown Ottawa. We are also expanding to the Maritimes.



# Context

---

Groupe Mach wishes to present its comments to the province for the new PPS which aims to combine the elements of A Place of Grow and the current PPS into a new more comprehensive land use policy. As Groupe Mach represent an important stakeholder in the current and future development of properties within the province of Ontario, we want to share our thoughts in hope to improve the new proposed PPS.



# Generate an appropriate housing supply

---

We encourage the province to propose policies which aim to increase the minimum density requirements specially for the major transit areas, strategic growth areas and existing employment areas. In our opinion, minimum density requirements should reflect the aspirations of the province to provide a substantial amount of housing to meet housing needs. As a result, density targets must be substantially high to support higher density potential of redevelopments. For strategic growth areas the targets should be aggressive enough to force higher densities as of right.

In our experience, we are systematically confronted with low density targets where we can provide 3 or 4 times the minimum density and where we must convince municipalities to agree with higher density targets. Density targets should not be low enough that it becomes a tool for municipalities to negotiate with developers, specially in a context where there is an increasing need of housing.

In the case of providing an appropriate mix of housing options, the policy must be flexible enough to allow innovation. Requirements for mix housing must not become an additional economical burden for redevelopments project as we can currently experience where new developments fees are constantly added to redevelopment projects for the poor planning of municipalities. The charges and the benefits should be shared between the municipalities and the developers to provide proper mix housing without becoming a burden for future redevelopments.

Once again, in our experience, we are confronted to provide mix housing in redevelopments with little to no flexibility on the approach. When combining these requirements with low density targets where it is excruciating to gain additional density from the municipalities, redevelopments projects can't fulfill their maximum potential and optimize the utilisation of the land.

Finally, we are in favor of accurately defining employment areas to preserve specifically designated areas of employment and allow a redevelopment of other employment areas, mainly those including office uses. As an example, we have acquired The Atria Complex (Atria I, II and III) in North York where a great portion of the site is designated as an employment area and the process to allow residential uses is lengthy and complex. By allowing employment areas like these to be excluded from the protected and planned employment areas, it allows to optimize the land use and offer mixed uses including a residential component. Needs have substantially changed, and we can now transform existing land where people now want to live, work and play.



# Provide infrastructure to support development

---

We encourage the province to propose policies which require municipalities to plan for stormwater management, water and waste management infrastructure, and waste management systems. It is fundamental for municipalities to be ahead of infrastructure needs as this is often a component which directly impacts development and/or redevelopment opportunities. Planning in advance for infrastructures needs in relation to higher density targets must be a priority as private projects most of the time can be planned and built ahead of deploying new infrastructure. In addition, financing options for new infrastructures should be though between the province and the municipalities to accelerate their deployment.

In addition, transportation infrastructure should be encouraged on the public realm for projects requirements to be coherent with the area. Per example, bicycle infrastructure should be in place prior to require projects to provide interventions increasing bike use within unsafe transit corridors. The same principle applies to other requirements for private land where the public realm lacks proper infrastructure.



# Conclusion

---

In conclusion, as we are currently expanding our business in Ontario, we want to share what we experience throughout our 40M square feet of properties in different municipalities and provinces. We strongly believe that the new PPS is a great opportunity to establish policies to adequately support planning needs mainly in housing, employment areas and infrastructure. A more coordinated, integrated, and comprehensive approach is required to encourage developers and municipalities to work together. It is essential that the regulatory framework remains flexible and adaptable to market needs as well as precise enough to reflect proper housing, employment areas and infrastructure needs.

Throughout the past years we have experienced one too many barriers leading to miss opportunities for accelerating development and construction. As previously stated, planning approvals, and reaching agreements with municipalities are often part of a lengthy and complex process which leads to unoptimized land use, construction delays and slow growth. In our industry, time is of essence especially when we have the capacity to create new projects and transform existing sites to meet market needs in housing, commercial, office, institutional and industrial uses.



# Annex 1

---

## TORONTO and GTA

### [Atria Complex](#)

2225-2255 Sheppard Av E  
North York ON M2J 5B4

### [5875 Explorer](#)

5875 Explorer Drive  
Mississauga ON L4W 0E1

### [First Meadowvale Centre P1](#)

2465 Argentia Road  
Mississauga ON L5N 0B5

### [Allstate Corporate Centre](#)

15 Allstate Parkway  
Markham ON L3R 5B4

### [175 Commerce Valley](#)

175 Commerce Valley Drive W  
Markham ON L3T 7P6

### [1840 Clement](#)

1840-1842 Clement Road  
Pickering ON G1W 3R8

## OTTAWA

### [ONE60 Elgin](#)

160 Elgin Street  
Ottawa ON K2P 2P7

### [222 Queen](#)

222-230 Queen Street  
Ottawa ON K1P 5V9

### [77 Metcalfe](#)

77 Metcalfe Street  
Ottawa ON K1P 5L6

### [100 O'Connor](#)

100 O'Connor Street  
Ottawa ON K1P 5M9

### [1145 Hunt Club](#)

1145 Hunt Club Road  
Ottawa ON K1V 0Y3

### [21 Fitzgerald](#)

21 Fitzgerald Road  
Nepean ON K2H 9I4

### [1870 Alta Vista](#)

1870 Alta Vista Drive  
Ottawa ON K1G 6R7

### [750 Palladium](#)

750 Palladium Drive  
Kanata ON K2V 1C7

### [400 Cooper](#)

400 Cooper Street  
Ottawa ON K2P 2N1

### [35 Fitzgerald](#)

35 Fitzgerald Road  
Nepean ON K2H 1E6

### [25 Fitzgerald](#)

25 Fitzgerald Road  
Nepean ON K2H 1C3

### [1000 Innovation](#)

1000 Innovation Drive  
Kanata ON K2K 3E7

### [700 Palladium](#)

700 Palladium Drive  
Kanata ON K2V 1C8

### [800 Palladium](#)

800 Palladium Drive  
Kanata ON K2V 1C9

### [1 Antares](#)

1 Antares Drive  
Nepean ON K2E 8C4

### [Vanguard Building](#)

171 Slater Street  
Ottawa ON K1P 5H7

### [770 Palladium](#)

770 Palladium Drive  
Kanata ON H2V 1C8

## OTHER URBAN AREAS

### [1250 Spence](#)

1250 Spence Avenue  
Hawkesbury ON K6A 3T4

### [Belleville Complex](#)

500 College Street East  
Belleville ON K0K 2V0





