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November 22, 2024

City of Mississauga Heritage Advisory Committee
 Mississauga Civic Centre
 Council Chamber, 2nd Floor
 300 City Centre Drive,
 Mississauga, ON L5B 3C1

Dear Chair and Members of the Heritage Advisory Committee:

**Re: Proposed Streetsville Heritage Conservation District (HCD) and Plan
 27 Reid Drive, Mississauga
 Public Meeting – Heritage Advisory Committee**

We represent Ardent Mills ULC (“Ardent Mills”) in connection with the property municipally known as 27 Reid Drive (the “Site”), which is located at the northeast corner of Reid Drive, bordered by rail tracks to the south and the Credit River to the north. Ardent Mills operates an industrial flour mill on the Site. The Site is currently listed on the City’s Heritage Register but has not been designated under the *Ontario Heritage Act*.

We have reviewed the proposed Streetsville Heritage Conservation District and Plan (“Streetsville HCD”), which we understand is being considered by this Committee at its meeting on November 26, 2024.

For the reasons stated below, we submit that the Site should be excluded from the proposed Streetsville HCD.

Streetsville HCD will negatively impact future business operations.

Ardent Mills operates a commercial flour mill on the Site, with a daily production capacity of 40,000 kg of flour. The mill is the largest softwheat flour mill in Canada. Inclusion in the Streetsville HCD would subject the property to Section 42 of the *Ontario Heritage Act*, requiring heritage permitting for any alterations to the Site. The Site is within the ‘Credit River and Valley Lands’ Character Area in the proposed Streetsville HCD Plan, and would be subject to the associated policies.

Policy 2.4.2 of the Streetsville HCD Plan mandates that new construction in the Credit River and Valley Lands Character Area must comply with either residential or commercial property policies, as determined by staff. While the commercial property policies in the Streetsville HCD Plan are likely more relevant to the Site than the residential policies,



they primarily focus on the Streetsville Commercial Core and do not account for industrial uses. Although the Character Area includes provisions for historic mill infrastructure, there are no policies addressing active mills.

If the Site is included in the Streetsville HCD and Ardent Mills needs to make alterations to the buildings and structures on the Site for new products or business lines, Ardent Mills would be required to obtain a permit from the City to do so, even where no other approvals are required. This would create delays and interfere with Ardent Mills' ability to adjust its business operations. This raises concerns about the company's ability to operate with the necessary flexibility, should the Streetsville HCD be approved.

Streetsville HCD will conflict with Employment Area protections.

The Site is designated as both Business Employment and Greenlands on Schedule 10 of the Mississauga Official Plan (2010), with the existing industrial flour mill primarily located within the Business Employment designation. This designation qualifies the site as an "Area of Employment" under the *Planning Act*. "Areas of Employment" are subject to special protections under both the *Planning Act* and the Provincial Planning Statement 2024 ("PPS"), which includes policies that direct planning authorities to preserve the economic viability of Employment Areas.

Specifically, PPS 2024 Policy 2.8.1.1(b) states:

Planning authorities should promote economic development and competitiveness by ... maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future business.

Further, PPS 2024 Policy 2.8.2.1 states that

Planning authorities shall plan for, protect and preserve employment areas for current and future uses.

While inclusion of the Site within the Streetsville HCD would not remove the Site from the Employment Area, imposing heritage restrictions on the employment lands will negatively impact the economic viability of the industrial operation. This would be inconsistent with the intent of the Employment Area protections in the PPS 2024.

The Site does not have heritage value.

While Ardent Mills acknowledges that the Site is listed in the Heritage Register, its view is that the Site has minimal heritage value and should not be included in the Streetsville HCD. Ontario Regulation 9/06 lists criteria for determining whether a property is of cultural heritage value or interest. The Site does not meet any of the criteria, and the City has not made a case that it does.



A key criteria for assessing heritage value is a building's physical value and historical value. The heritage integrity of the Site has been compromised by multiple additions and the use of modern materials from the 21st century. While the original mill on the property was built in 1835, the current facility retains only a few timbers from the original structure, meaning the building no longer holds significant historical value.

Another key criteria for assessing heritage value is a property's uniqueness or rarity. However, mills and dam sites along the Credit River are not rare; the Streetsville HCD Plan notes that there are 87 former mills and dam sites associated with the river. For the same reason, the Site does not demonstrate noteworthy craftsmanship, artistic value, or technical or scientific achievement.

Finally, heritage value is assessed based on a property's association with a significant theme, event, belief, or person, or its importance in defining the character of an area. No such connection between the Site and the surrounding area has been adequately demonstrated in the Streetsville HCD. The Streetsville HCD statement of significance focuses on topography and landforms that enabled the creation of mill privileges, rather than a direct association with the area's history or development.

For the reasons stated above, Ardent Mills hereby requests that the Site be excluded from the Streetsville HCD.

Should the City proceed with including the Site within the Streetsville HCD, we ask that staff engage in meaningful dialogue regarding these concerns.

We ask to be provided with notice of any decision of this Committee or Council regarding this matter.

Yours very truly,

WOOD BULL LLP

A handwritten signature in blue ink that reads "Kim Mullin".

Kim Mullin
KM/aa

c. Client