

## Draft Mississauga Official Plan 2051 – Response to Comments Matrix

List of Acronyms					
ARU	Additional Residential Unit	MTSA	Major Transit Station Area	PPS	Provincial Policy Statement
CA	Conservation Authority	NHS	Natural Heritage System	PSEZ	Provincially Significant Employment Zone
EPA	Environmental Protection Act	OP	Official Plan	PSW	Provincially Significant Wetland
IZ	Inclusionary Zoning	OPA	Official Plan Amendment	SGA	Strategic Growth Area
LU	Land Use	PBW	Parkway Belt West	UGC	Urban Growth Centre
MOPA	Mississauga Official Plan Amendment	PMTSA	Protected Major Transit Station Area		

PART I & PART II COMMENTS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
1	GSAI on behalf of Queenscorp (Erin Mills) Inc. for 4099 Erin Mills Parkway (letter #1, dated March 14, 2024)	<u>1:</u> 10.2.5 <u>2:</u> 10.2.5.8 <u>3:</u> 10.2.5.9 <u>4:</u> 14.1.1.4 <u>5:</u> 14.1.1.6 <u>6:</u> 14.1.1.7 <u>7:</u> 14.1.2.2 <u>8:</u> 5.2.2 & 5.2.4 <u>9:</u> 5.2.5 and Table 5.1	Policy Revision	<p>1. <u>Policy 10.2.5.10: Land Use Designations</u>: Concerns over language in policy regarding “Residential High Rise” designation. An issue for infill applications or the redevelopment of presently underutilized sites, such as this site. In the absence of OP policies prescribing maximum heights, this policy is interpreted to suggest the maximum permitted height on this site would effectively be one storey. Suggested re-wording: “<del>If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property. Building heights in the Residential High Rise designation shall have a compatible massing and scale of built form that considers existing and planned context, intensification policies where applicable, and that considers the role of the subject site in the broader context of the City’s hierarchy.</del>”</p> <p>2. <u>Policy 10.2.5.8</u>: Concerns over the language found in the “Residential Mid Rise” designation policy. This policy is restrictive and does not consider development that may be contextually appropriate. This policy has the potential to preclude sites (specifically infill sites) from developing to their full potential where it can be otherwise supported.</p> <p>3. <u>Policy 10.2.5.9</u>: appropriate - the language provides a degree of flexibility which requires that buildings meet certain policy design aspirations. Any language more restrictive is a dangerous and short-sighted method of evaluating contextually appropriate development.</p> <p>4. <u>Policy 14.1.1.4</u>: Fallout policies for implementation challenge the intent. Despite introductory sentence providing language for a full range of housing types (which are compatible), policy a) reads that housing forms should generally be within the low-rise scale. The word “generally” is acknowledged, but policy a) appears to not support the intent of 14.1.1.4 which is to explore the provision of a full range of housing options. By extension, policy a) also frustrates the intent of policy b) by being inherently restrictive on densities and built forms. The language provided in policy c), while an improvement over policies a) and b) could be modified: <u>c. Direct Encourage neighbourhood-appropriate higher density uses to locate within existing apartment sites and commercial centres, or other areas deemed appropriate through technical studies, ideally situated along Neighbourhood Arterials or as directed by Character Area policies.</u> Policy should be further revised to also include lands along “Corridors” and sites in close proximity to open spaces, commercial uses (i.e., plazas, malls) and other uses that support and are supported by residential land uses. Policy d) is entirely appropriate. Policy e) suggests certain uses require protection but the City hasn’t</p>	<p>1. The site noted in the letter at “4099 Erin Mills Parkway” is not subject to policy 10.2.5.10 as it is currently designated Mixed Use.</p> <p>2. Mid-rise designated sites are intended to offer an opportunity for an increase in height that is appropriate for the local context without the need for a lengthy process. They permit a built form of a human scale while allowing additional as of right heights ranging between 8 and 12 stories depending on character areas.</p> <p>3. Noted.</p> <p>4. Upon reviewing the bullets under this policy, we are recommending removal of 14.1.1.4.a. Language does not add to the intent of the policy.</p> <p>5. Noted, but it is important that development is consistent with the policies of the plan.</p> <p>6. Noted.</p> <p>7. Policy 14.1.2.2.a commercial uses within neighbourhoods are crucial to the completeness of these communities. In many areas within the City more, and not, less retail is needed within walking distance to residences to increase walkability and reduce car dependency. Policy 14.1.2.2.c This policy establishes an overall framework for all sites across the city, which is why it needs to be general and high-level. If additional granular and site-specific details are needed, these will be determined through the application review process.</p> <p>8. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>9. Policy revised to better meet its intent: “The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</p>

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				<p>provided any rationale on whether these are uses subject to market conditions and whether these uses are sustainable and thus may be more appropriately located elsewhere or replaced with other local services.</p> <p>5. <u>Policy 14.1.1.6</u>: Modify to bring it better into conformity with overarching housing affordability objectives and goals. <i>Intensification within Neighbourhoods may be considered where the proposed development is compatible in built form and scale to surrounding development, enhances the existing or planned development and is generally consistent with the policies of this Plan.</i> (addition of “generally” to soften language/increase flexibility).</p> <p>6. <u>Policy 14.1.1.7</u>: Appropriate – flexible language and opportunity to evaluate on site and area specific basis.</p> <p>7. <u>Policy 14.1.2.2</u>: Concerning – Policy a) overly cautious and rigid. Requiring a 1:1 replacement of commercial floor space is extreme and can be detrimental to the optimization of available lands. Policy should be removed or reworded: <i>a. maintain the same an adequate amount of commercial floor space if deemed appropriate through a market study</i>; Policy c) is problematic and inappropriate. One-size-fits-all policies could be contrary to growth and be a dangerous precedent for development. Policies in section 4.1.3 Residential are more suitable to regulate building heights within Neighbourhoods.</p> <p>8. <u>Policy 5.2.2 &amp; 5.2.4: Affordable Housing</u>: While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. Suggested modification to policy 5.2.4.: <i>“To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may consider a lower diversification of housing types and sizes reduce these percentages where development is providing:...”</i> If percentage is to remain, request that policy be amended to encourage a reduced percentage of family-sized units to be provided.</p> <p>9. <u>Policy 5.2.5 and Table 5-1: Affordable Housing</u>: Questioning appropriateness of percentages on a smaller scale (City). Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing.</p>	
2	Pound & Stewart on behalf of Orlando Corporation “Heartland Business Community” (Proposed Gateway Corporate Centre Employment Area) (letter #2, dated March 14, 2024)	<u>1-3</u> : Multiple <u>4</u> : 5.7.6 <u>5</u> : 15.12 <u>6</u> : Chapter 7&8 policies <u>7</u> : Ch. 8	Policy reassessment	<p>1. MOP 2051 includes policies that fail to address the new reality of the office workplace. Request to reassess current “Office” land use policies and regulations.</p> <p>2. <u>MOPA 143 &amp; 144</u>: Certain properties identified with minimum Building Heights of 3 storeys, whereas minimum Building Height of 2 storeys is permitted per approved Zoning By-law 0121-2020.</p> <p>3. <u>MOPA 143 &amp; 144</u>: Minimum MTSA FSI density per the City’s Table 5-2 is 1.0 FSI, but the recently approved Zoning By-law provides for lower FSI minimums, per draft policy 5.7.3.3.</p> <p>4. <u>Policy 5.7.6</u>: Too rigid, “Developments will: a. minimize surface parking...”</p> <p>5. <u>Policy 15.12</u>: Request for the City to re-assess current ‘Office’ land use policies &amp; implement the proposed ‘Heartland Concept Plan’.</p> <p>6. <u>Policies 7.3.4.5, 8.3.7, 8.4.1.6 and 7.3.4.7</u>: policies would not necessarily be mandatory due to a settlement in February 2017 with the City (OPA 25). Policies should be taken into consideration as part of PMTSA, development application process considerations of the needs of the applicant and function of the land use. They need to be carefully applied because some projects will have the ability and basis to be served by private driveway systems, independent of public streets with public easements.</p> <p>7. <u>Policy 8.4.1.8</u>: UD criteria should be reasonably applied to Employment Areas: Important that lands designated “Business Employment” include “Outdoor Storage” as</p>	<p>1. Employment Area policies within MOP conform to those within the Regional OP, the in-force and effect Provincial requirements and the City’s vision and plans. These policies will however be updated as any of the aforementioned plans require.</p> <p>2. As per the <i>Planning Act</i>, zoning by law conformity is required within a 1-year period from the approval of the relevant MTSA policies. The applicable zoning bylaws for lands within MTSA are in the process of being updated to conform with the MOPA 144 requirements. The building height requirements in MTSA are informed by existing OP policies and recently approved area-specific studies.</p> <p>3. The FSIs shown in Table 5-2 of MOPA 144 is not a parcel specific requirement but an MTSA-wide FSI. The MTSA policies in MOPA 144 clarify that new development will be planned for, in conjunction with existing development densities, to achieve the minimum residents and jobs combined per hectare, through the building height requirements shown and the minimum Protected Major Transit Station Area FSI shown in Table 5-2. The minimum FSI will be achieved over the long-term, and is a cumulative measure of planned density across the lands within a Protected Major Transit Station Area. Individual development proposals do not need to meet the minimum Floor Space Index (FSI) target.</p> <p>4. Policy 11.7.6 is within MTSA where parking will need to be reduced as per provincial requirements to support transit and active transportation.</p>

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				a permitted use, accessory to the main permitted use. There are policies in MOP 2051 that eliminate “outdoor storage” absolutely, excluding the ability to incorporate the use of appropriate setbacks, screening, landscaping and buffering”. Too restrictive – the building’s overall function should determine its built form and productive business employment requirements.	5. Review of site specific proposals is undertaken outside of the OP review. Recommendations from the review will either be implemented through a site-specific amendment or within the OP review. 6. These are general policies that apply to Strategic Growth Areas across the City. OPA 25 appeal concerns special site policies which take precedence over these policies – these special sites are found in Chapter 16. 7. Outdoor Storage permitted as accessory uses are permitted within “Business employment” for up to 20% of the total GFA. Outdoor storage is permitted in relation to manufacturing. Within Gateway, adjacent to LRT corridor, it is recommended to have denser employment uses that are transit-supportive.
3	Pound & Stewart on behalf of Hensall Landholdings c/o Cooksville Steel Ltd (510 Hensall Circle) (letter #4, dated March 14, 2024)	<u>1</u> : Ch. 7 & 8 <u>2</u> : 15.10.2.2	Policy Concerns	<ol style="list-style-type: none"> <li><u>Policies 7.3.4.5, 8.3.7, 8.4.1.6 and 7.3.4.7</u>: policies would not necessarily be mandatory due to a settlement in February 2017 with the City (OPA 25). Policies should be taken into consideration as part of PMTSA, development application process considerations of the needs of the applicant and function of the land use. They need to be carefully applied because some projects will have the ability and basis to be served by private driveway systems, independent of public streets with public easements.</li> <li><u>Policy 15.10.2.2</u>: Modification of policy to include “Mixed Use Limited” designated lands – “15.10.2.2 Notwithstanding the Business Employment policies of this Plan, existing industrial uses that require extensive outdoor processing and storage will be permitted, and may expand, except where adjacent to residentially designated lands, and lands designated Mixed Use Limited”</li> </ol>	<ol style="list-style-type: none"> <li>These are general policies that apply to Strategic Growth Areas across the City. OPA 25 appeal concerns special site policies which take precedence over these policies – these special sites are found in Chapter 17.</li> <li>Lands are currently designated “Mixed Use Limited” and will be subject to the requirements of the designation and area specific policies. Since sensitive land uses are not permitted as of right on lands designated “Mixed Use Limited”, proposed modification to the policy will unduly restrict existing and future uses in Business Employment designated areas.</li> </ol>
4	GSAI on behalf of Owner of 69 & 117 John Street (letter #5, dated March 14, 2024)	<u>1</u> : 5.2.5 and Table 5.1 <u>2</u> : Ch. 11 <u>3</u> : Section 5.2; policies 5.2.2 & 5.2.4 <u>4-7</u> : Policies 8.3.12 (b), 8.4.1.17, 8.4.5.2 & 8.6.2.5 <u>8</u> : 10.2.5.10 <u>9-11</u> : Ch. 12 policies <u>12-13</u> : Ch. 14 policies	Policy Revision	<ol style="list-style-type: none"> <li><u>Policy 5.2.5 &amp; Table 5.1: Affordable Housing</u>: Questioning appropriateness of percentages on a smaller scale (City). Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing.</li> <li><u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</li> <li><u>Policy 5.2.2 &amp; 5.2.4: Affordable Housing</u>: While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. Suggested modification: “To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may consider a lower diversification of housing types and sizes <del>reduce these percentages where development is providing...</del>” If percentage is to remain, request that policy be amended to encourage a reduced percentage of family-sized units to be provided.</li> <li><u>Policy 8.3.12 (b)</u>: Better regulated in Zoning By-law document – blanket policy should not be applied to new development (largely in the form of infill) with respect to setbacks.</li> <li><u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</li> <li><u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site’s locational attributes and intended users. “Privately owned publicly accessible spaces <del>will be designed in accordance with</del> shall have regard for the city’s standards for public open spaces.”</li> </ol>	<ol style="list-style-type: none"> <li>Policy revised to better meet its intent: “5.2.5 The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</li> <li>The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</li> <li>The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</li> <li>Policy 8.3.12 does not replicate zoning as the language indicates the need not to mirror existing conditions but to establish orderly and well planned patterns within the City, especially in areas where development is through infill. However, upon reviewing the policies under 8.3.1.2, we are recommending removal of bullet a., b. and the term “overlook” in d. Language does not meet the intent of the policy.</li> <li>8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</li> <li>Policy deleted.</li> <li>Policy updated and made more general in language to provide more flexibility in built form.</li> <li>The policy establishes a height range that fits each context. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</li> <li>Policy is not restrictive as it uses “may”. Furthermore, UGCs are provincially identified and have set people and jobs growth targets to meet. This policy ensures targets are taken into account during the application stage in order to be met.</li> <li>Reference to the setbacks for the street frontage provisions for Street ‘B’ (policy 12.3.4) is an urban design objective to support the vision for a vibrant downtown. The policy does</li> </ol>

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			<p>7. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>8. <u>Policy 10.2.5.10: Land Use Designations</u>: Concerns over language in policy regarding “Residential High Rise” designation. This policy presents an issue for infill applications or the redevelopment of presently underutilized sites, such as this site. In the absence of OP policies prescribing maximum heights, this policy is interpreted to suggest the maximum permitted height on this site would effectively be one storey. Re-word policy to: <i>“If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property. Building heights in the Residential High Rise designation shall have a compatible massing and scale of built form that considers existing and planned context, intensification policies where applicable, and that considers the role of the subject site in the broader context of the City’s hierarchy.”</i> This policy would effectively refer applicants to PMTSA policies and schedules, which prescribe a 25 storey height limit.</p> <p>9. <u>Policy 12.1.1.6</u>: Policy may have unintended consequences – does not respond to evolving community contexts, needs or market trends. Policy is also vague, as ‘concentration of jobs’ is not defined. Consider re-wording to: <i>Proponents of development applications within the Urban Growth Centre may be required to should consider demonstrate how new development contributes to a concentration and mix of jobs and whether it is contextually appropriate as a key component of a mixed-use transit supportive development.</i> The proponent may consider providing an appropriate amount of GFA to accommodate for non-residential uses providing employment opportunities.</p> <p>10. <u>Policy 12.3.2</u>: Concerns with Cooksville policy framework. John Street is classified as “B” Street - question requirement for setbacks along “B” Streets. Better handled in a Zoning By-law. Either revise policy or include language for smaller setbacks to street which assist in creating an animated and desirable pedestrian realm. Alternatively, due to context, John Street should be excluded from any street classification. An additional provision could be added as such: <i>e. reduced or minimal setbacks to buildings can be considered through the site design process where it has been deemed appropriate in consideration of site context, or as a result of unique site circumstances.</i></p> <p>11. <u>Policy 12.5.4.2</u>: 25 storey height cap too restrictive. Suggested revision: <i>On lands designated Residential High-rise and Mixed Use and located outside of Special Site 1 in Cooksville Urban Growth Centre, the maximum permitted building height as shown on Schedule 8: Protected Major Transit Station Area (Schedule 8I) may be exceeded by up to three storeys without an amendment to this Plan, subject to meeting the building transition policies of this Plan, where a development provides additional non-residential uses, including community infrastructure. One additional storey in building height may be permitted for every 900 square metres of non-residential gross floor area (GFA) provided above the first storey. This does not include amenity space, above grade parking or ground floor non-residential uses, where required by the policies of this Plan.</i></p> <p>12. <u>Policies 14.1.1.1 &amp; 14.1.1.2</u>: Policies are too restrictive regarding heights</p> <p>13. <u>Policy 14.1.1.3</u>: Policies are too restrictive regarding heights.</p>	<p>not specify a measurement. It would require development to “provide generous setbacks from the street to accommodate, among other things, landscaping, street furniture, wayfinding, bus shelters, pedestrian scaled lighting and outdoor patios.” The proposed development would be reviewed through the development application process to determine the setback condition.</p> <p>11. Based on recently approved MOPA 144, heights can be exceeded within an MTSA subject to criteria and may require a site-specific OPA. This was done to increase flexibility.</p> <p>12. Policies establish a height regime that is consistent with the OP framework and follows the requirements under the <i>Planning Act</i>. In order to introduce some flexibility, heights can be exceeded within an MTSA subject to criteria and may require a site-specific OPA.</p> <p>13. Policy 14.1.1.3 is identical to MOP policy 16.1.1.1 and only applies to lands with heights non-regulated by land use designation.</p>
5	Pound & Stewart on behalf of Orlando Corporation (“Heartland Town Centre”) (letter #6, dated March 14, 2024)	<u>1.</u> Ch. 7 & 8 policies <u>2.</u> Chapter 8 <u>3.</u> 10.2.6.3 <u>4.</u> 11.6.1 <u>5.</u> 11.6.2	Restrictive Policies & Revision Request	<p>1. <u>Policies 7.3.4.5, 8.3.7, 8.4.1.6 and 7.3.4.7</u>: policies would not necessarily be mandatory due to a settlement in February 2017 with the City (OPA 25). Policies should be taken into consideration as part of PMTSA, development application process considerations of the needs of the applicant and function of the land use. They need to be carefully applied because some projects will have the ability and basis to be served by private driveway systems, independent of public streets with public easements.</p> <p>1. These are general policies that apply to Strategic Growth Areas across the City. OPA 25 appeal concerns special site policies which take precedence over these policies – these special sites are found in Chapter 17.</p> <p>2. Noted.</p>



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				<p>2. <u>Chapter 8</u>: Policies regarding urban design criteria should be carefully applied so as to not unreasonably/negatively impact the planned function, cost and delivery of employment lands and buildings.</p> <p>3. <u>Policy 10.2.6.3</u>: Not supported – burden on ratio of commercial and residential space in ‘Heartland Town Centre’. Were residential to be added, it would consider context and be mindfully located, but having to redevelop the same amount of non-residential floor space hampers flexibility to add residential in future.</p> <p>4. <u>Policy 11.6.1</u>: Adjust policy to remove ‘General’ to protect from adjacent Employment Areas: “11.6.1 Development will:  <i>a. be compatible with surrounding uses;</i>  <i>b. mitigate impacts to and not interfere with existing or future operations of adjacent uses in General Employment Areas; and</i>  <i>c. employ appropriate mitigation and compatibility measures as identified and secured through the development application process.”</i></p> <p>5. <u>Policy 11.6.2</u>: Adjust policy to remove ‘General’ to protect from adjacent Employment Areas: “11.6.2 Sensitive land uses, including residential uses, proposed outside of and adjacent to or near to General Employment Areas, lands designated Industrial or Business Employment, or within the influence area of major employment facilities will need to demonstrate, to the satisfaction of the City, that:...”</p>	<p>3. Lands designated Mixed Use are intended to offer much-needed supportive services and jobs in order to sustain complete communities. Changes have been introduced to use a formula and percentages relative to the area size.</p> <p>4. “General” will be removed as it is not a term used throughout the OP.</p> <p>5. Same as above.</p>
6	Justin Robitaille on behalf of Dream Asset Management (70 Park Street East) (letter #7, dated March 15, 2024)		Policy Revision	<p>1. Request for the City to reconsider position on the ability of applicants to amend specific PMTSA policies.</p> <p>2. Supportive of height permissions greater than those currently proposed within PMTSAs.</p>	<p>1. &amp; 2. Policies of the PMTSA framework build on the prescribed requirements of the <i>Planning Act</i> which sets out what/how policies can be amended. A new policy (11.5.2) was added to allow development to exceed maximum building heights within MTSA subject to criteria.</p>
7	BILD Members (various properties) (letter #8, dated March 14, 2024)	General	Follow up	<p>1. Will be sending follow-up email with more comments, but have concerns with Chapters 3, 5, 8, 10, 11 &amp; 12.</p> <p>2. Would like confirmation the timeline for Council approval.</p>	<p>1. Noted.</p> <p>2. Responded with estimated timeline of when MOP 2051 will be brought to Council for approval (Added to mailing list).</p>
8	GSAI on behalf of Blackrock Acquitaine Ltd. (6719 Glen Erin Drive) (letter #9, dated March 15, 2024)	<u>1</u> : 10.2.5.10 <u>2-4</u> : Policies under 14.10: Meadowvale	Policy Revision	<p>1. <u>10.2.5.10</u>: Concerned with this policy for Residential High-Rise Lands, that if no heights are specified in Character Area or Special Site provisions, the max height cannot exceed tallest building on property.</p> <p>2. <u>14.10.2.2</u>: Concerned with policies – Meadowvale is growing, should be permitted greater heights (&gt;12) and density. This policy also does not detail how the limitation of density is to be applied.</p> <p>3. <u>14.10.2.5</u>: Concerns with application of 45-degree angular plane (no details on how it is to be applied) &amp; 40-metre separation is onerous.</p> <p>4. <u>14.10.2.6</u>: Concerned with how policy is written – restrictive. Should not require podiums, but their incorporation should be assessed.</p>	<p>1. The policy establishes a height range that fits each context. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</p> <p>2. Policy was established through a comprehensive secondary planning process. Height maximums reflect the findings of the study.</p> <p>3. Both policies around the 45 angular plane and 40m separation distance are prefaced with the word “generally” meaning that 45 degrees and 40m of separation should be a goal but is not a requirement. “45 degree” was removed to provide for more flexibility in the application of transition tools.</p> <p>4. Tall buildings generally require podiums that vary in height according to their heights. These allow for the creation of better street proportions and the achievement of human scale. Policy was adjusted with the addition of the word “generally” to allow for more flexibility on the height of the podium.</p>
9	GSAI on behalf of Camcentre (1,2 & 3) Holdings Inc (135, 151, and 157 City Centre), 3672 Kariya Drive & 134-152 Burnhamthorpe Road West (letter #10, dated March 15, 2024)	<u>1</u> : Section 5.2; policies 5.2.2 & 5.2.4 <u>2</u> : 5.2.5 and Table 5.1 <u>3</u> : Policies 7.3.2.3: Complete Streets	Policy Revision	<p>1. <u>Policy 5.2.2. &amp; 5.2.4: Affordable Housing</u>: While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. If percentage is to remain, request that policy be amended to encourage a reduced percentage of family-sized units to be provided.</p> <p>2. <u>Policy 5.2.5 &amp; Table 5-1: Affordable Housing</u>: Questioning appropriateness of percentages on a smaller scale (City). Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing.</p> <p>3. <u>Policy 7.3.2.3</u>: Application and open-ended interpretation of this policy is inappropriate – too general.</p>	<p>1. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>2. Reworded to the following: “The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</p> <p>3. Policy 7.3.2.3, which is identical to current policy 8.2.1.1 is needed to ensure development supports the City’s growing multi-modal network.</p> <p>4. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way</p>

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		<p><u>4:</u> 8.4.1.17, 8.4.5.2 &amp; 8.6.2.5  <u>5:</u> 11.3.2 &amp; 11.3.3  <u>6-7:</u> Ch. 12 policies</p>		<p>4. <u>8.4.1.17, 8.4.5.2 &amp; 8.6.2.5:</u> Object to all UD &amp; building requirements. Relationship between built form &amp; ROW and design of POPS should be site specific. UD direction should be in the form of UD guidelines or Built Form Standards.</p> <p>5. <u>Policies 11.3.2 &amp; 11.3.3:</u> Policies regarding replacement of non-residential floor spaces are inappropriate – should be considered on site-by-site basis.</p> <p>6. <u>Policies 12.2.4.2-3 &amp; 12.2.4.4:</u> Requirement for replacement of jobs within development is inconsistent with Regional and Provincial visions for Mississauga's UGC. Too restrictive, better to provide appropriate, site-specific employment uses &amp; density.</p> <p>7. <u>Policies 12.2.8.21 a-d:</u> Rejection to policy requiring the design of a podium or above grade parking structure – should be determined on a site-by-site basis.</p>	<p>width. 8.4.5.2 will be delete as 4.3.4 is sufficient, 8.6.2.5: Policy updated and made more general in language to provide more flexibility in built form.</p> <p>5. The Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>6. Both policies are encouragement policy to ensure the UGC meets its targeted jobs growth.</p> <p>7. The policy provides for general best practice designs to facilitate the integration of parking structures with the rest of the development.</p>
10	GSAI on behalf of BET Realty Ltd. and 3420 Hurontario Street Incorporated (3420 & 3440 Hurontario Street) (letters #11/12.1, dated March 15, 2024)	<p><u>1:</u> Policy 5.2.2  <u>2:</u> 5.2.4  <u>3:</u> 5.2.5 &amp; Table 5.1  <u>4:</u> Chapter 11  <u>5:</u> 12.1.1.6  <u>6:</u> 16.106.1-116.106.3</p>	Policy Revision, maintain policies	<p>1. <u>Policy 5.2.2:</u> Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4:</u> Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1:</u> Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policy 8.4.1.17:</u> Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>5. <u>Policy 8.4.5.2:</u> Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and intended users. <i>"Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city's standards for public open spaces."</i></p> <p>6. <u>Policy 8.6.2.5:</u> Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>MOPA 143 &amp; 144:</u> Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p> <p>8. <u>Policy 12.1.1.6:</u> Restrictive and may have unintended consequences – does not respond to evolving community contexts, needs or market trends. Provide clarification on how "a concentration and mix of jobs" is to be defined.</p> <p>9. <u>16.106.1-16.106.3:</u> Support policy for Special Site 106 policies - recommend policies be maintained.</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>"The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</i></p> <p>4. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>5. Policy deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>7. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are partially under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act. Additional height increases have been introduced as part of the updated schedule 8.</p> <p>8. Policy uses a "may be required" statement, allowing for adaptation and filtering through a lens of evolving community contexts and market trends.</p> <p>9. No action required.</p>
11	Urban Strategies on behalf of SmartCentres REIT (3155 Argentia Road/Meadowvale, 1100 Burnhamthorpe Road and 780 Burnhamthorpe Road) (letter #12, dated March 15, 2024)	<p>Policies  <u>1-2:</u> 9.1.4  <u>3:</u> 9.1.5  <u>4:</u> 9.4  <u>5:</u> 11.3.2  <u>6:</u> 15.4.9.3 &amp; 15.5.1</p>	Reconsideration of policies & revisions	<p>1. Revise Policy 9.1.4.c to read <i>"encourage the intensification of existing Employment Areas with compatible employment uses"</i> as draft MOP does not consider retail to be an employment use.</p> <p>2. Amend policy 9.1.4.d to read "concentrate high-density employment uses such as major office and major institutional in Major Transit Station Areas and other Strategic Growth Areas, <i>where appropriate</i>"</p> <p>3. Introduce a new Policy 9.1.5 that states <i>"Notwithstanding Policy 9.4.1, any development or redevelopment of lands within Employment and Strategic Growth Areas, and located adjacent to lands outside of the Employment Area, will have regard for the adjacent uses to ensure that there are no land use compatibility concerns."</i></p>	<p>1. This policy mainly intends to encourage employment diversification and growth by ensuring compatible employment uses locate together to support that diversity.</p> <p>2. MTSA and SGAs are identified by provincial plans and policies as areas most suitable for high concentrations of jobs in order to support transit and infrastructure investment. The policy reflects provincial directions.</p> <p>3. Not needed. Draft MOP contains policy language that addresses land use compatibility as per Regional and Provincial policy direction.</p> <p>4. Policy not required, if the use is already existent, it is permitted by the Plan. Expansion of existing uses is generally a zoning matter.</p>

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				<p>4. Prohibiting new freestanding retail uses is not appropriate – retail is a predominant use on all three sites. Suggested re-wording for preamble to section 9.4: <i>“New freestanding retail uses will <del>not be permitted</del> be discouraged. Where retail uses currently exist, the expansion of such sites shall be permitted by the City.”</i></p> <p>5. Policies regarding replacement of non-residential floor spaces may be unfeasible – they do not represent the current market and community needs. Suggested revision: <i>“Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space will <del>not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced</del> be required to provide a non-residential component as part of the redevelopment. The exact mix of appropriate non-residential uses will be established through future planning applications to the satisfaction of the City.”</i></p> <p>6. <u>15.4.9.3 &amp; 15.5.1</u>: Prohibiting new freestanding retail uses is not appropriate for this site as retail is a predominant use. It is expected for the sites to continue accommodating retail, and in some cases major retail.</p>	<p>5. These policies are part of the PMTSA framework where development is to accommodate future growth through a diverse mix of land uses. Maintaining non-residential employment uses is necessary in meeting the density target of people and jobs.</p> <p>6. Lawfully established retail will continue to be permitted as per the Plan. Accessory retail uses will also be permitted. However, as clearly outlined through provincial directions, Major Retail is intended to locate outside of Employment Areas.</p>
12	Urban Strategies on behalf of Port Credit West Village Partners (70 Mississauga Road South and 181 Lakeshore Road West – “Brightwater Site”) (letter #13, dated March 15, 2024)		Policy Revision	<p>1. Brightwater is in a Neighbourhood but should be in a Strategic Growth Area due to the vision and goals for development – designate site as new Community Node in Schedule 1 or add policy below to Port Credit Local Area Plan: <u>12.3.3.4 Major intensification may be appropriate at the Brightwater Site</u></p> <p>2. <u>Policies 14.1.1.4.a. &amp; 14.1.1.5</u>: potential source of conflict for Brightwater development, due to language around Neighbourhoods being low-rise in scale and development restrictions.</p> <p>3. ROP encourages Mississauga to identify major intensification opportunities in the OP – Brightwater should therefore be identified as an SGA.</p>	<p>1. Given the increase in intensity and built form, Brightwater has been identified as a new Growth Node.</p> <p>2. 14.1.1.4.a has been deleted. 14.1.1.5 modified. Both policies no longer apply to the site as it is now an SGA.</p> <p>3. Please see response 1. above.</p>
13	MHBC on behalf of Studio Bottega (6967 Maritz Drive) (letter #14, dated March 15, 2024)	<u>1</u> . Policy 10.2.8	Policy Revision	<p>1. Office LU designation: addition of “warehousing, distributing and wholesaling” as a permitted use.</p>	<p>1. Land use designations have changed from “Office” to “Business Employment” and now allow for manufacturing and accessory uses such as warehousing. OP Staff met with proponent on September 27, 2024, to discuss concerns.</p>
14	GSAI on behalf of Camilla Towns Inc. (2040 Camilla Road) (letter #15, dated March 15, 2024)	<u>1</u> . Policy 5.2.2 <u>2</u> : 5.2.4 <u>3</u> : 5.2.5 & Table 5.1 <u>4</u> : 8.4.1.17 <u>5</u> : 8.4.5.2 <u>6</u> : 8.6.2.5 <u>7</u> : Policy 8.6.1.a. <u>8</u> : Schedule 8m <u>9</u> : Chapter 11 <u>10</u> : 12.6.3.2 <u>11</u> : 12.6.4 <u>12</u> : 16.122.1 & 16.122.2	Policy Revision, Inconsistency, MTSA, Maintain Policies	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>5. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site’s locational attributes and intended users. <i>“Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city’s standards for public open spaces.”</i></p> <p>6. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>8.6.1.a</u>: Inconsistency between low-rise built form for Subject Lands and built form based LU designation of “Residential High-Rise” also assigned to site. Modification of</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>“The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</i></p> <p>4. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>5. Policy deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>7. Policy establishes a definition for a building typology that can be found anywhere in Mississauga regardless of designation or use.</p> <p>8. Application will be subject to policies in Chapter 11, the applicable Character Area policies and as prescribed by the Planning Act as Schedules 8 represent lands within PMTSAs.</p> <p>9. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p>

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				<p>policy to recognize that “low-rise buildings may exist and be permitted in various land use designations and in various communities across the City.”</p> <p>8. <u>Schedule 8m</u>: Policy direction: how development applications seeking additional building heights than those established by MTSA Schedules are evaluated.</p> <p>9. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p> <p>10. <u>Policy 12.6.3.2</u>: Does not adequately accommodate community context or evolving market trends. Suggest policy be revised to enable additional height through different evaluation criteria (not by providing additional non-res areas).</p> <p>11. <u>Policy 12.6.4</u>: Concerning given that development potential of Subject Lands were confirmed through active development app. Request to have Subject Lands excluded from policy going forward.</p> <p>12. <u>16.122.1 &amp; 16.122.2</u>: Support policy for Special Site 122 policies - recommend policies be maintained.</p>	<p>10. Policy is part of the PMTSA framework to allow for height flexibility. Additional heights can be achieved as prescribed by the Planning Act.</p> <p>11. Policy 12.6.4 is carried forward from Mississauga Official Plan. Proposed modifications to the policies are minor changes, e.g. replace Credit Valley Conservation with “the conservation authority”. Please refer to Chapter 17, Special Site 122.</p> <p>12. Noted.</p>
15	GSAI on behalf of Equity Three Holdings Inc. (3085 Hurontario St) (letter #16, dated March 15, 2024)	<p><u>1</u>: Policy 3.3.1 &amp; Map 3-1</p> <p><u>2</u>: Policy 3.3.5.2.c</p> <p><u>3</u>: Policy 5.2.4, 5.2.5 &amp; Table 5.1</p> <p><u>5</u>: 8.4.1.17</p> <p><u>6</u>: 8.4.3.6</p> <p><u>7</u>: 8.4.5.2</p> <p><u>8</u>: 8.5.13</p> <p><u>9</u>: 8.6.2.2.g</p> <p><u>10</u>: 8.6.22.j</p> <p><u>11</u>: 8.6.2.5</p> <p><u>12</u>: 8.6.2.7</p> <p><u>13</u>: 10.2.5.10</p> <p><u>14</u>: 10.2.6.2 &amp; 10.2.6.3</p> <p><u>15</u>: Ch. 11 &amp; Schedules 8a-8r</p> <p><u>16</u>: 11.3.2 &amp; 11.3.3</p> <p><u>17</u>: Chapter 11</p> <p><u>18</u>: 12.1.1.5</p> <p><u>19</u>: 12.1.1.6</p> <p><u>20</u>: 12.3.2.1</p> <p><u>21</u>: 12.5.4.2</p> <p><u>22</u>: 16.113.1 &amp; 16.113.2</p>	Concern with Policy as written	<p>1. <u>Policy 3.3.1 &amp; Map 3-1</u>: Subject Lands located within SGA, UGC and within MTSA. Concerned that proposed heights and density requirements for City Structure Elements proposed in Figure 3.2 are not consistent with goals and objectives and may contain conflicting requirements for lands within more than one category.</p> <p>2. <u>Policy 3.3.5.2.c</u>: Policy concerning and contrary to Planning Act – assertions in policy are incorrect. Opposition to policy c) as it is written and request for removal.</p> <p>3. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>4. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>5. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive. If policy is to remain, should be narrowed, referring to relevant built forms and City Structure areas and specific building relationships.</p> <p>6. <u>Policy 8.4.3.6</u>: Concerning &amp; requires revision. New streets should be determined through more technical requirements &amp; criteria. Too broad – request for policy to be removed.</p> <p>7. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site’s locational attributes and intended users.</p> <p>8. <u>Policy 8.5.1.3.d</u>: Too restrictive. Scale of development should not be limited to the street it fronts. Contrary to policy e) – request removal.</p> <p>9. <u>Policy 8.6.2.2.g</u>: Overly restrictive – request removal. Front, side and rear yards can vary significantly across communities.</p> <p>10. <u>Policy 8.6.2.2.i</u>: Restrictive – request removal.</p> <p>11. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>12. <u>Policy 8.6.2.7</u>: Vague and concerning – request removal. Unclear how policy is to be applied – should be based on site-specific context.</p> <p>13. <u>Policy 10.2.5.10: Land Use Designations</u>: Concerns over language in policy regarding “Residential High Rise” designation. This policy presents an issue for infill applications</p>	<p>1. Figures – as stated in the Official Plan – are included for information and illustration purposes only, they are not policy. Figure 3.2 provides a simplified view of the different levels of intensity of SGAs and the uses.</p> <p>2. Policy aligns with Provincial Planning Statement requirements to align growth with infrastructure investment through long term planning.</p> <p>3. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>4. Reworded to the following: “<i>The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.</i>”</p> <p>5. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>6. The policy is flexible as it indicates that new streets “may” be introduced as an indication that context will be important in deciding where new streets are needed.</p> <p>7. Policy deleted.</p> <p>8. Upon reviewing bullets d) &amp; e) under policy 8.5.1.3, we are recommending their removal. Language does not add to the intent of the policy.</p> <p>9. This policy has been removed.</p> <p>10. It is appropriate to have regard to these contextual elements. These are not requirements but to be considered as part of the planning process.</p> <p>11. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>12. Policy speaks to establishing appropriate building relationship and transition and represent good planning.</p> <p>13. The policy establishes a height range that fits each context. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</p> <p>14. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>15. See response above.</p>

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				<p>or the redevelopment of presently underutilized sites, such as this site. In the absence of OP policies prescribing maximum heights, this policy is interpreted to suggest the maximum permitted height on this site would effectively be one storey. Re-word policy to: <i>"If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property. Building heights in the Residential High Rise designation shall have a compatible massing and scale of built form that considers existing and planned context, intensification policies where applicable, and that considers the role of the subject site in the broader context of the City's hierarchy."</i> This policy would effectively refer applicants to PMTSA policies and schedules, which prescribe a 25 storey height limit.</p> <p>14. <u>10.2.6.2 &amp; 10.2.6.3</u>: Concerning policies – request removal or increased flexibility. Requirement for retention of non-residential floor space does not consider evolving context of community &amp; market trends.</p> <p>15. <u>Ch. 11 &amp; Schedules 8a-r</u>: Discrepancy between LU designations &amp; policy framework in Ch. 11 and lands on Schedules 8a-8r.</p> <p>16. <u>Policies 11.3.2 &amp; 11.3.3</u>: Policies regarding replacement of non-residential floor spaces are inappropriate – should be considered on site-by-site basis.</p> <p>17. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p> <p>18. <u>Policy 12.1.1.5</u>: Restrictive – recommend removal. Does not provide ability to respond to current economy and consumer trends.</p> <p>19. <u>Policy 12.1.1.6</u>: Restrictive – does not provide ability to respond to current economy and consumer trends. Modify to state clearly how concentration of jobs is to be defined and to provide greater flexibility for MU developments to accommodate appropriate non-res uses.</p> <p>20. <u>Policy 12.3.2.1</u>: Concerns with UD-related policies (45 degree angular plane &amp; 30m tower separation distance) – inappropriate and problematic. Should be modified to increase flexibility and to recognize that appropriate transitions can be provided in various ways.</p> <p>21. <u>Policy 12.5.4.2</u>: Concerned with identified max building heights. Policy does not consider evolving context or changing market trends – developer should base non-res area on specific context.</p> <p>22. <u>Policy 16.113.2</u>: Restrictive – policy should be modified to encourage range of non-res uses, without specifying minimum floor area or number of storeys.</p>	<p>16. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>17. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p> <p>18. The policy was deleted from the Downtown Core Chapter. But continues to apply to Growth Centres and Nodes with a slight change to allow for flexibility.</p> <p>19. Policy is not restrictive as it uses "may". Furthermore, UGCs are provincially identified and have set people and jobs growth targets to meet. This policy ensures targets are taken into account during the application stage in order to ensure they are met.</p> <p>20. Both policies around the 45-degree angular plane and 30m separation distance are prefaced with the word "generally" meaning that 45-degrees and 30m of separation should be a goal but is not a requirement.</p> <p>21. Policy establishes a height regime that is consistent with the OP framework and follows the requirements under the Planning Act.</p> <p>22. The policy is intended to provide for certainty in creating much needed mixture of uses to support new and existing residents.</p>
16	GSAI on behalf of Erin Mills Town Centre (\$100 Erin Mills Parkway) (letters #17, dated March 15, 2024)	<p><u>1</u>: 5.2.2</p> <p><u>2</u>: 5.2.4</p> <p><u>3</u>: 5.2.5 &amp; Table 5.1</p> <p><u>4</u>: 8.4.1.17</p> <p><u>5</u>: 8.4.5.2</p> <p><u>6</u>: 8.6.2.5</p> <p><u>7</u>: 8.6.1.c</p> <p><u>8</u>: 10.2.6.2 &amp; 10.2.6.3</p> <p><u>9</u>: 13.1.1.3</p> <p><u>10</u>: 13.2.2.1, 13.2.3.3.1</p>	Policy Revision	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>5. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and intended users.</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>"The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</i></p> <p>4. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>5. Policy deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p>



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		<u>11</u> : 13.2.3.5.1 & 13.2.3.9.1		<p><i>"Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city's standards for public open spaces."</i></p> <p>6. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>Policy 8.6.1.c</u>: Subject Lands are not subject to Local Area Plan – policy does not capture reality nor include sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of LAP boundaries. Request high-rise buildings characterization be re-defined to recognize existence and allow permission for tall buildings at appropriate locations across the City.</p> <p>8. <u>Policies 10.2.6.2 &amp; 10.2.6.3</u>: Concerning policies – request removal or increased flexibility. Requirement for retention of non-residential floor space does not consider evolving context of community &amp; market trends.</p> <p>9. <u>Policy 13.1.1.3</u>: Restrictive - request for greater flexibility.</p> <p>10. <u>Policies 13.2.2.1 &amp; 13.2.3.3.1</u>: 25 storey max building height is unnecessarily restrictive and inconsistent with variable building heights approved by City Council elsewhere.</p> <p>11. <u>Policy 13.2.3.5.1.a</u>: Request removal - concerned with requirement for provide affordable housing. Burden for development industry. Responsibility best left to government organization or Housing Service Manager to provide this housing.</p>	<p>7. Policy provides a definition of High-rise buildings as a typology independent of location. Heights as stated in the policy are subject to site and area requirements and policies.</p> <p>8. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>9. Nodes as SGAs are expected to provide for highest employment densities to all the City to meet its employment growth targets and create complete communities. Notwithstanding, a small revision to the policy has been made.</p> <p>10. Policy 13.2.2.1 – Due to the proposed revisions to the City structure, the 25 storey maximum only applies to the Central Erin Mills Growth Node, consistent with the re-imagining the mall OLT settlement.</p> <p>11. Policy is currently subject to an appeal and will be revisited after the conclusion of the legal process.</p>
17	GSAI on behalf of Forest Park Circle Ltd. (4100 Ponytrail Rd and 1850 Rathburn Rd E) (letter #19, dated March 13, 2024)	<p><u>1</u>. Section 5.2; policies 5.2.2 &amp; 5.2.4</p> <p><u>2</u>. Policy 5.2.7</p> <p><u>3</u>. Policies 5.3.3.11, 5.3.3.12</p> <p><u>4</u>. Table 5.2 &amp; 5.3.3.13</p> <p><u>5</u>: 10.2.5.10</p> <p><u>6</u>: 14.1.1.1 &amp; 14.1.1.2</p> <p><u>7</u>: 14.1.1.3</p> <p><u>8</u>: 14.1.1.4.c</p> <p><u>9</u>: 14.1.1.5</p>	Restrictive Policies & Clarification	<p>1. <u>Policy 5.2.4: Affordable Housing</u>: While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. Suggested modification: <i>"To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may consider a lower diversification of housing types and sizes reduce these percentages where development is providing..."</i> If percentage is to remain, request that policy be amended to encourage a reduced percentage of family-sized units to be provided.</p> <p>2. <u>Policy 5.2.7</u>: Policy should be revised to clarify affordable units to be required in strategic locations (MTSAs) where IZ is applicable.</p> <p>3. <u>Policies 5.3.3.11 &amp; 5.3.3.12</u>: Concern with City policy identifying affordable housing units to be a mix of one, two and three-bedroom units, as well as the required price point for each unit type. These are best established on a site-specific evaluation &amp; may affect the delivery of housing.</p> <p>4. <u>Table 5.2 &amp; 5.3.3.13</u>: Request for greater clarification on the effects of forthcoming O.Reg. 232/18 &amp; how the affordability period unit and the set aside rates conform to the evolving Provincial policy framework.</p> <p>5. <u>Policy 10.2.5.10: Land Use Designations</u>: Concerns over language in policy regarding "Residential High Rise" designation. This policy presents an issue for infill applications or the redevelopment of presently underutilized sites, such as this site. In the absence of OP policies prescribing maximum heights, this policy is interpreted to suggest the maximum permitted height on this site would effectively be one storey. Re-word policy to: <i>"If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property. Building heights in the Residential High Rise designation shall have a compatible massing and scale of built form that considers existing and planned context, intensification policies where applicable, and that considers the role of the subject site in the broader context of the City's hierarchy."</i> This policy would effectively refer applicants to PMTSA policies and schedules, which prescribe a 25 storey height limit.</p> <p>6. <u>Policies 14.1.1.1 &amp; 14.1.1.2</u>: Policies are too restrictive regarding heights.</p>	<p>1. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>2. Although not required, affordable housing units are encouraged outside of MTSAs, where IZ is not applicable.</p> <p>3. This has been Council approved through the IZ framework. It is important to maintain this level of detail to achieve the City's housing targets.</p> <p>4. Rates have been updated to support the creation of affordable units. The policy is general in requesting a mix of one-bedroom units and family sized units.</p> <p>5. The policy establishes a height range that fits each context. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</p> <p>6. The policies establish a height regime that is consistent with the OP framework and follows the requirements under the Planning Act.</p> <p>7. Policy 14.1.1.3 is identical to MOP policy 16.1.1.1 and only applies to lands with heights non-regulated by land use designation.</p> <p>8. Many of these elements are left to local area policies to prescribe. The Policy is a general policy that aims to direct intensities towards supporting the creation of complete communities. Corridors are further defined in the OP by using the City's new classification.</p> <p>9. Policy has been modified.</p>



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				<p>7. <u>Policy 14.1.1.3</u>: Policies are too restrictive regarding heights.</p> <p>8. <u>Policy 14.1.1.4.c</u>: Too restrictive –should be revised to also include lands along “Corridors” and sites in close proximity to open spaces, commercial uses and other uses that support and are supported by residential land uses.</p> <p>9. <u>Policy 14.1.1.5</u>: Should reference the criteria noted in policy 14.1.1.4 as appropriate exceptions to intensification within neighbourhoods. Also, the OP should recognize “clusters” within neighbourhoods. Clusters would complement and supplement the existing City hierarchy. Subject Land is a good example of a portion of a potential “cluster”.</p>	
18	GSAI on behalf of Kings Mill Homes Development 1 & 2 Inc. (150 and 180 Rutledge Rd) (letter #20, dated March 15, 2024)	<p><u>1</u>: 5.2.4</p> <p><u>2</u>: 5.2.5 &amp; Table 5.1</p> <p><u>3</u>: 8.4.1.17</p> <p><u>4</u>: 8.4.5.2</p> <p><u>5</u>: 8.6.2.5</p> <p><u>6</u>: 8.6.1.b.</p> <p><u>7</u>: 8.6.1.c.</p> <p><u>8</u>: Ch. 11</p>	Restrictive Policies & Revision Suggestions	<p>1. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>2. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>3. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>4. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site’s locational attributes and intended users. <i>“Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city’s standards for public open spaces.”</i></p> <p>5. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>6. <u>Policy 8.6.1.b.</u>: Modification of policies: policies do not provide sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of Local Area Plan boundaries.</p> <p>7. <u>Policy 8.6.1.c.</u>: Subject Lands are not subject to Local Area Plan – policy does not capture reality nor include sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of LAP boundaries. Request high-rise buildings characterization be re-defined to recognize existence and allow permission for tall buildings at appropriate locations across the City.</p> <p>8. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p>	<p>1. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>2. Reworded to the following: <i>“The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</i></p> <p>3. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>4. Policy deleted.</p> <p>5. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>6. Policy establishes a definition for a building typology that can be found anywhere in Mississauga regardless of designation or use.</p> <p>7. Designation and site specific policies allow for context specific heights.</p> <p>8. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p>
19	GSAI on behalf of Montcrest Asset Management (51, 57 Tannery St & 208 Emby Dr) (letter #21, dated March 15, 2024)	<p><u>1</u>: 5.2.2</p> <p><u>2</u>: 5.2.4</p> <p><u>3</u>: 5.2.5 &amp; Table 5.1</p> <p><u>4</u>: 8.4.1.17</p> <p><u>5</u>: 8.4.5.2</p> <p><u>6</u>: 8.6.2.5</p> <p><u>7</u>: 8.6.1</p>	Restrictive Policies & Redesignation of Lands	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>5. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site’s locational attributes and intended users. POPS</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>“The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</i></p> <p>4. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>5. Policy deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p>

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				<p>of varying sizes, locations and configurations can be successfully planned, designed and delivered.</p> <p>6. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>Policy 8.6.1</u>: Policies lack flexibility – built form characterizations should be modified to allow for a range of diverse development forms at appropriate locations.</p> <p>8. See proposed residential Mid Rise designation as down designation.</p>	<p>7. The policy provides definitions for what constitutes low, mid and high-rise buildings in Mississauga.</p> <p>8. Given the current context, mid-rise is the most appropriate designation for this site. Additional height can always be achieved through the development application review process.</p>
20	GSAI on behalf of Morguard Corp (letter #22, dated March 15, 2024)	<p>Policies</p> <p><u>1</u>: 5.2.2</p> <p><u>2</u>: 5.2.4</p> <p><u>3</u>: 5.2.5 &amp; Table 5.1</p> <p><u>4</u>: 8.4.1.17</p> <p><u>5</u>: 8.4.5.2</p> <p><u>6</u>: 8.6.2.5</p> <p><u>7</u>: 8.6.1</p> <p><u>8</u>: 11.3.2</p> <p><u>9</u>: 12.1.1.5</p> <p><u>10</u>: 12.1.1.6</p> <p><u>11</u>: 14.1.2.2</p> <p><u>12</u>: MOPA 141 &amp; 145</p>	Restrictive Policies, Exemption Request, Redesignation of Lands & Revisions	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive. If policy is to remain, should be narrowed, referring to relevant built forms and City Structure areas and specific building relationships.</p> <p>5. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and intended users.</p> <p>6. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>Policy 8.6.1</u>: Policies lack flexibility – built form characterizations should be modified to allow for a range of diverse development forms at appropriate locations.</p> <p>8. <u>Policy 11.3.2</u>: Policies regarding replacement of non-residential floor spaces may be unfeasible – they do not represent the current market and community needs. Suggested revision: <i>“Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced be required to provide a non-residential component as part of the redevelopment. The exact mix of appropriate non-residential uses will be established through future planning applications to the satisfaction of the City.”</i></p> <p>9. <u>Policy 12.1.1.5</u>: Restrictive – recommend removal. Does not provide ability to respond to current economy and consumer trends</p> <p>10. <u>Policy 12.1.1.6</u>: Restrictive – does not provide ability to respond to current economy and consumer trends. Modify to state clearly how concentration of jobs is to be defined and to provide greater flexibility for MU developments to accommodate appropriate non-res uses.</p> <p>11. <u>Policy 14.1.2.2</u>: The criteria listed are too restrictive, will discourage redevelopment. Also, oppose bullet c., the max building height of 8 storeys and request its removal.</p> <p>12. <u>MOPA 141 &amp; 145</u>: 1477/1547 Mississauga Valleys Blvd: Both proposed new MTSA policies are either awaiting Regional approval or subject to pending appeals. Oppose height limitations imposed within this or any MTSA. If City were to pursue establishing</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>“The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</i></p> <p>4. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>5. Policy deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>7. The policy establishes a definition for a building typology that can be found anywhere in Mississauga regardless of designation or use. The policies make clear that these typologies are general in nature and to consider the right-of-way widths.</p> <p>8. These policies are part of the PMTSA framework where development is to accommodate future growth through a diverse mix of land uses. Maintaining non-residential employment uses is necessary in meeting the density target of people and jobs.</p> <p>9. The policy was deleted from the Downtown Core Chapter. But continues to apply to Growth Centres and Nodes with a slight change to allow for flexibility.</p> <p>10. Policy is not restrictive as it uses “may”. Furthermore, UGCs are provincially identified and have set people and jobs growth targets to meet. This policy ensures targets are taken into account during the application stage in order to ensure they are met.</p> <p>11. Policy 14.1.2.2.a commercial uses within neighbourhoods are crucial for the completeness of these communities. In many areas within the City more retail is needed within walking distance to residences to increase walkability and reduce car dependency. Policy 14.1.2.2.c This policy establishes an overall framework for all sites across the city, which is why it needs to be general and high-level. If additional granular and site-specific details are needed, these will be determined through the application review process. This policy represents a doubling of maximum permitted heights from the previous Official Plan and additional policies were added to incentivize retail above the ground floor by increasing heights above 8 storeys.</p> <p>12. Some height revisions have been incorporated as part of the updated schedule 8. Additional new policies that permit heights in above maximums are proposed as part of the new draft OP.</p>

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				max heights, then additional policies allowing minor increases should be entertained subject to certain criteria without the need for an OPA.	
21	GSAI on behalf of Petruso Point Service Corp (Starmont Estates Inc.) (letter #23, dated March 15, 2024)	<b>Policies</b> <b>1:</b> 5.2.2 <b>2:</b> 5.2.4 <b>3:</b> 5.2.5 & Table 5.1 <b>4:</b> 8.4.1.17 <b>5:</b> 8.4.5.2 <b>6:</b> 8.6.2.5 <b>7:</b> 8.6.1.b. <b>8:</b> 8.6.1.c. <b>9:</b> 10.2.6.2 & 10.2.6.3 <b>10:</b> 14.1.1.6 <b>11:</b> 14.1.2.2 <b>12-14:</b> Policies under 14.10 Meadowvale	Restrictive Policies	<ol style="list-style-type: none"> <li><b>Policy 5.2.2:</b> Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</li> <li><b>Policy 5.2.4:</b> Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</li> <li><b>Policy 5.2.5 &amp; Table 5.1:</b> Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</li> <li><b>Policy 8.4.1.17:</b> Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</li> <li><b>Policy 8.4.5.2:</b> Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and intended users. <i>"Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city's standards for public open spaces."</i></li> <li><b>Policy 8.6.2.5:</b> Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</li> <li><b>Policy 8.6.1.b:</b> Modification of policies: policies do not provide sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of Local Area Plan boundaries.</li> <li><b>Policy 8.6.1.c:</b> Subject Lands are not subject to Local Area Plan – policy does not capture reality nor include sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of LAP boundaries. Request high-rise buildings characterization be re-defined to recognize existence and allow permission for tall buildings at appropriate locations across the City.</li> <li><b>10.2.6.2 &amp; 10.2.6.3:</b> Concerning policies – request removal or increased flexibility. Requirement for retention of non-residential floor space does not consider evolving context of community &amp; market trends.</li> <li><b>Policy 14.1.1.6:</b> Policy may challenge the development potential of lands.</li> <li><b>Policy 14.1.2.2:</b> The criteria listed are too restrictive, will discourage redevelopment. Also, oppose bullet c., the max building height of 8 storeys and request its removal.</li> <li><b>14.10.2.2:</b> Concerned with policies – Meadowvale is growing, should be permitted greater heights (&gt;12) and density. This policy also does not detail how the limitation of density is to be applied.</li> <li><b>14.10.2.5:</b> Concerns with application of 45-degree angular plane (no details on how it is to be applied) &amp; 40-metre separation is onerous.</li> <li><b>14.10.2.6:</b> Concerned with how policy is written – restrictive. Should not require podiums, but their incorporation should be assessed.</li> </ol>	<ol style="list-style-type: none"> <li>Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</li> <li>The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</li> <li>Reworded to the following: <i>"The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</i></li> <li>8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</li> <li>Policy deleted.</li> <li>Policy updated and made more general in language to provide more flexibility in built form.</li> <li>Policy establishes a definition for a building typology that can be found anywhere in Mississauga regardless of designation or use.</li> <li>Policy provides a definition of High rise buildings as a typology independent of location. Heights as stated in the policy are subject to site and area requirements and policies.</li> <li>Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</li> <li>Noted, but it is important that development is consistent with the policies of the plan.</li> <li>Policy 14.1.2.2.a commercial uses within neighbourhoods are crucial into the completeness of these communities. In many areas within the City more, and not, less retail is needed within walking distance to residences to increase walkability and reduce car dependency. Policy 14.1.2.2.c This policy establishes an overall framework for all sites across the city, which is why it needs to be general and high-level. If additional granular and site-specific details are needed, these will be determined through the application review process. Policy was revised to provide for more flexibility and additional heights to compensate for non-residential uses above the ground floor.</li> <li>Policy was established through a comprehensive secondary planning process. Height maximums reflect the findings of the study.</li> <li>Both policies around the 45 angular plane and 40m separation distance are prefaced with the word "generally" meaning that 45 degrees and 40m of separation should be a goal but is not a requirement. 45 degree removed to provide for more flexibility in the application of transition tools.</li> <li>Tall buildings generally require podiums that vary in height according to their heights. These allow for the creation of better street proportions and the achievement of human scale.</li> </ol>
22	GSAI on behalf of Stephen-Mitchell Realty Ltd, Whitehom Investments Ltd & Lynrob Investments (1225 Dundas St E) (letter #24, dated March 15, 2024)	<b>1:</b> Map 3-1 <b>2:</b> 5.2.2. <b>3:</b> 5.2.4 <b>4:</b> 5.2.5 & Table 5.1 <b>5:</b> 8.4.1.17 <b>6:</b> 8.4.5.2 <b>7:</b> 8.6.2.5 <b>8:</b> 8.6.1.a.	Modification of Node Boundaries, Inconsistency	<ol style="list-style-type: none"> <li><b>Map 3-1:</b> Request for modification to include Subject Lands within the refined Dundas-Dixie Community Node, as outlined in active Applications and MOP 141.</li> <li><b>Policy 5.2.2:</b> Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</li> <li><b>Policy 5.2.4:</b> Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</li> </ol>	<ol style="list-style-type: none"> <li>There are no changes to the boundaries of the Dundas-Dixie growth node as part of the OP review process. The boundaries were recently established based on a detailed review of the area.</li> <li>Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</li> <li>The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</li> </ol>

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		<p><u>9</u>: 8.6.1.c  <u>10</u>: 10.2.6.2 &amp; 10.2.6.3  <u>11</u>: Ch. 11  <u>12</u>: 11.3.2 &amp; 11.3.3  <u>13</u>: 11.3.4  <u>14</u>: 14.1.1.6  <u>15</u>: 14.1.2.2</p>		<p>4. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>5. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>6. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and intended users. <i>"Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city's standards for public open spaces."</i></p> <p>7. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>8. <u>Policy 8.6.1.a</u>: Inconsistency between low-rise built form for Subject Lands and built form based LU designation of "Residential High-Rise" also assigned to site. Modification of policy to recognize that "low-rise buildings may exist and be permitted in various land use designations and in various communities across the City."</p> <p>9. <u>Policy 8.6.1.c</u>: Subject Lands are not subject to Local Area Plan – policy does not capture reality nor include sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of LAP boundaries. Request high-rise buildings characterization be re-defined to recognize existence and allow permission for tall buildings at appropriate locations across the City.</p> <p>10. <u>10.2.6.2 &amp; 10.2.6.3</u>: Concerning policies – request removal or increased flexibility. Requirement for retention of non-residential floor space does not consider evolving context of community &amp; market trends.</p> <p>11. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p> <p>12. <u>Policies 11.3.2 &amp; 11.3.3</u>: Policies regarding replacement of non-residential floor spaces are inappropriate – should be considered on site-by-site basis.</p> <p>13. <u>Policy 11.3.4</u>: Policies require modification: requirement to demonstrate how a development contributes to a concentration of jobs is restrictive.</p> <p>14. <u>Policy 14.1.1.6</u>: Policy may challenge the development potential of lands.</p> <p>15. <u>Policy 14.1.2.2</u>: The criteria listed are too restrictive, will discourage redevelopment. Also, oppose bullet c., the max building height of 8 storeys and request its removal.</p>	<p>4. Reworded to the following: <i>"The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</i></p> <p>5. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>6. Policy deleted.</p> <p>7. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>8. Policy establishes a definition for a building typology that can be found anywhere in Mississauga regardless of designation or use.</p> <p>9. Policy provides a definition of High-rise buildings as a typology independent of location. Heights as stated in the policy are subject to site and area requirements and policies.</p> <p>10. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>11. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p> <p>12. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>13. Criteria clearly outline how development within PMTSA would contribute to the creation of transit-supportive communities as required by provincial plans and policies.</p> <p>14. Noted, but it is important that development is consistent with the policies of the plan.</p> <p>15. Policy 14.1.2.2.a commercial uses within neighbourhoods are crucial into the completeness of these communities. In many areas within the City more, and not, less retail is needed within walking distance to residences to increase walkability and reduce car dependency. Policy 14.1.2.2.c This policy establishes an overall framework for all sites across the city, which is why it needs to be general and high-level. If additional granular and site-specific details are needed, these will be determined through the application review process.</p>
23	Dream Asset Management on behalf of Owner of 70 Park Street East (letter #25, dated Marc 15, 2024)	General -Height limits	Follow up	<p>1. Dream would be supportive of greater height permissions than those proposed.</p> <p>2. Concerns with the City's position that PMTSA policies will not be amendable once implemented – inflexible – request for the City to reconsider position on the ability to amend specific PMTSA policies.</p> <p>3. Request to be added to the notification list for updates regarding the Official Plan.</p>	<p>1. Noted.</p> <p>2. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act. Policies have been modified to provide for additional flexibility in heights.</p> <p>3. Keep Dream updated with OPR (Notified Engagement Specialist).</p>
24	GSAI on behalf of Solex Design Inc. (4496 Ninth Line) (letter #26, dated March 17, 2024)	<u>1</u> : Policy 16.20	Policy Revision	<p>1. Request to remove client's lands from larger Employment District east of Ninth Line, to become part of the Ninth Line Corridor District and be designated for Residential Mid Rise. A proposal to the DARC will be submitted shortly for mid-rise development.</p>	<p>1. Areas are designated by in-force and effect former Regional OP as employment areas. A development application to remove the lands from the Employment Area can be submitted under current Planning Act provisions.</p>

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25	GSAI on behalf of City Park Homes Inc. (6-12 Queen St. S., 16 James St. & 2 William St.) (letter #27, dated March 15, 2024)	<u>1</u> : Policy 8.4.1.17.	Restrictive Policies	1. <u>Policy 8.4.1.17</u> : Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive. If policy is to remain, should be narrowed, referring to relevant built forms and City Structure areas and specific building relationships.	1. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.
26	GSAI on behalf of Mississauga Hurontario Hotel LP (letter #29, dated March 15, 2024)	<u>1</u> : 5.2.2 <u>2</u> : 5.2.4 <u>3</u> : 5.2.5 & Table 5.1 <u>4</u> : 7.3.2.3 <u>5</u> : 8.4.1.17, 8.4.5.2 & 8.6.2.5 <u>6</u> : 11.3.2 & 11.3.3 <u>7</u> : 12.1.1.6 <u>8-9</u> : 12.2.3.8 <u>10</u> : 12.2.4.2-3 & 12.2.4.4	Policy Revision	1. <u>Policy 5.2.2</u> : Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type. 2. <u>Policy 5.2.4</u> : Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units. 3. <u>Policy 5.2.5 &amp; Table 5.1</u> : Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas. 4. <u>Policy 7.3.2.3</u> : Application and open-ended interpretation of this policy is inappropriate – too general. 5. <u>8.4.1.17, 8.4.5.2 &amp; 8.6.2.5</u> : Object to all UD & building requirements. Relationship between built form & ROW and design of POPS should be site specific. UD direction should be in the form of UD guidelines or Built Form Standards. 6. <u>Policies 11.3.2 &amp; 11.3.3</u> : Policies regarding replacement of non-residential floor spaces are inappropriate – should be considered on site-by-site basis. 7. <u>Policy 12.1.1.6</u> : Restrictive and may have unintended consequences – does not respond to evolving community contexts, needs or market trends. Provide clarification on how “a concentration and mix of jobs” is to be defined. 8. <u>Policy 12.2.3.8</u> : Restrictive and may have unintended consequences – object to policy requiring employment or office development. Does not respond to evolving community contexts, needs or market trends. Better determined through site-specific assessment. 9. <u>Policy 12.2.3.8</u> : Object also to policy suggesting re-investment to public realm through development application. 10. <u>Policies 12.2.4.2-3 &amp; 12.2.4.4</u> : Suggesting increases in employment opportunities to be accommodated is restrictive & inflexible. Better determined through site-specific assessment.	1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy. 2. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers. 3. Reworded to the following: “ <i>The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.</i> ” 4. Policy 7.3.2.3, which is identical to current policy 8.2.1.1 is needed to ensure development supports the City’s growing multi-modal network. 5. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width. 8.4.5.2 will be delete as 4.3.4 is sufficient, 8.6.2.5: Policy updated and made more general in language to provide more flexibility in built form. 6. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area. 7. Policy uses a “may be required” statement, allowing for adaptation and filtering through a lens of evolving community contexts and market trends. 8. Noted. 9. Policy does not necessarily suggest public realm investments through development applications, although that could be a venue. These investments have generally been suggested due to its context, the neighbourhood’s mature nature and Kariya Park and the school to the south. 10. Both policies are encouragement policy to ensure the UGC meets its targeted jobs growth.
27	MHBC on behalf of Home Depot of Canada Inc. (3065 Mavis Rd, 5975 Terry Fox Way, 2920 Argentia Rd) (letter #30, dated March 11, 2024)	<u>1</u> : Policy 15.4.4.3.2 (in-force OP)	Policy Revision	1. Request the reinstatement of the existing special policy exemption for 2920 Argentia Rd – vital to preserve the store’s longstanding and legally recognized use for retail warehousing.	1. Policy 1.3.e protects existing uses, allows for limited expansions of these uses and deems these uses to conform to the plan. There is no need to reinstate the Special Site.
28	GSAI on behalf of Hillmond Investments Ltd. (377 Burnhamthorpe Rd E) (letter #31, dated March 15, 2024)	<u>1</u> : 3.3.1 <u>2</u> : 5.2.2 <u>3</u> : 8.4.1.17 <u>4</u> : 8.4.5.2 <u>5</u> : 8.6.2.5 <u>6</u> : 8.6.1.c <u>7</u> : 10.2.6.2-10.2.6.3 <u>8</u> : Ch. 11	Policy Modification	1. <u>Policy 3.3.1</u> : Continued inclusion of Subject Lands within Neighbourhoods may challenge development. 2. <u>Policy 5.2.2</u> : Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type. 3. <u>Policy 8.4.1.17</u> : Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive. 4. <u>Policy 8.4.5.2</u> : Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site’s locational attributes and intended users.	1. Subject lands are part of the Central Parkway MTSa and the Rathwood Neighbourhood. A policy has been added to permit heights up to 8 storeys and additional development flexibility. 2. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy. 3. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width. 4. Policy deleted.



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		<p><u>9</u>: 11.3.2 &amp; 11.3.3  <u>10</u>: 14.1.1.6  <u>11</u>: 14.1.2.2</p>		<p><i>"Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city's standards for public open spaces."</i></p> <p>5. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>6. <u>Policy 8.6.1.c</u>: Subject Lands are not subject to Local Area Plan – policy does not capture reality nor include sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of LAP boundaries. Request high-rise buildings characterization be re-defined to recognize existence and allow permission for tall buildings at appropriate locations across the City.</p> <p>7. <u>10.2.6.2 &amp; 10.2.6.3</u>: Concerning policies – request removal or increased flexibility. Requirement for retention of non-residential floor space does not consider evolving context of community &amp; market trends.</p> <p>8. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p> <p>9. <u>Policies 11.3.2 &amp; 11.3.3</u>: Policies regarding replacement of non-residential floor spaces are inappropriate – should be considered on site-by-site basis.</p> <p>10. <u>Policy 14.1.1.6</u>: Policy may challenge the development potential of lands.</p> <p>11. <u>Policy 14.1.2.2</u>: The criteria listed are too restrictive, will discourage redevelopment. Also, oppose bullet c., the max building height of 8 storeys and request its removal.</p>	<p>5. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>6. Policy provides a definition of High-rise buildings as a typology independent of location. Heights as stated in the policy are subject to site and area requirements and policies.</p> <p>7. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>8. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p> <p>9. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>10. Noted, but it is important that development is consistent with the policies of the plan.</p> <p>11. Policy 14.1.2.2.a commercial uses within neighbourhoods are crucial into the completeness of these communities. In many areas within the City more, and not, less retail is needed within walking distance to residences to increase walkability and reduce car dependency. Policy 14.1.2.2.c This policy establishes an overall framework for all sites across the city, which is why it needs to be general and high-level. If additional granular and site-specific details are needed, these will be determined through the application review process.</p>
29	GSAI on behalf of various clients & properties (letter #32, dated March 15, 2024)	<p><u>1</u>: 5.2.2  <u>2</u>: 5.2.4  <u>3</u>: 5.2.5 &amp; Table 5.1  <u>4</u>: 5.3.3.11 &amp; 5.3.3.12  <u>5</u>: Table 5.2 &amp; 5.3.3.13  <u>6</u>: 8.4.1.17  <u>7</u>: 8.4.5.2  <u>8</u>: 8.6.1.b.  <u>9</u>: 8.6.2.5  <u>10</u>: 10.2.5.8  <u>11</u>: 10.2.5.10  <u>12</u>: 10.2.6.3  <u>13</u>: MOPA 143 &amp; 144  <u>14</u>: 11.3.2 &amp; 11.3.3  <u>15</u>: 12.1.1.5  <u>16</u>: 12.1.1.6  <u>17</u>: 12.1.3.5</p>	Policy Revision	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policies 5.3.3.11 &amp; 5.3.3.12</u>: Concern with City policy identifying affordable housing units to be a mix of one, two and three-bedroom units, as well as the required price point for each unit type. These are best established on a site-specific evaluation &amp; may affect the delivery of housing.</p> <p>5. <u>Table 5.2 &amp; 5.3.3.13</u>: Request for greater clarification on the effects of forthcoming O.Reg. 232/18 &amp; how the affordability period unit and the set aside rates conform to the evolving Provincial policy framework.</p> <p>6. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>7. <u>Policy 8.4.5.2</u>: Statement that POPS be designed in accordance with City standards is concerning. POPS can be designed &amp; delivered in various ways. Policy should be revised to encourage compliance, not conformance.</p> <p>8. <u>Policy 8.6.1.b</u>: Concerned with characterization of mid-rise building – height limited to ROW it fronts onto is contrary to good planning objectives. Request removal.</p> <p>9. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>"The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</i></p> <p>4. This has been Council approved through the IZ framework. It is important to maintain this level of detail to achieve the City's housing targets.</p> <p>5. Rates have been updated to support the creation of affordable units. The policy is general in requesting a mix of one-bedroom units and family sized units.</p> <p>6. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>7. Policy deleted.</p> <p>8. Policy establishes a definition for a building typology that can be found anywhere in Mississauga regardless of designation or use. Policy was revised to consider right-of-way widths.</p> <p>9. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>10. The policy was revised to remove considerations for the right-of-way widths.</p> <p>11. The policy establishes a height range that fits each context. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</p>



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				<p>angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>10. <u>Policy 10.2.5.8</u>: Concerns over the language found in the “Residential Mid Rise” designation policy. This policy is restrictive and does not consider development that may be contextually appropriate. This policy has the potential to preclude sites (specifically infill sites) from developing to their full potential where it can be otherwise supported.</p> <p>11. <u>Policy 10.2.5.10</u>: Concerned with this policy for Residential High-Rise Lands, that if no heights are specified in Character Area or Special Site provisions, the max height cannot exceed tallest building on property.</p> <p>12. <u>Policy 10.2.6.3</u>: Not supported – non-residential replacement for MU properties is restrictive and does not consider context or market trends.</p> <p>13. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval.</p> <p>14. <u>Policies 11.3.2 &amp; 11.3.3</u>: Policies regarding replacement of non-residential floor spaces are inappropriate – should be considered on site-by-site basis.</p> <p>15. <u>Policy 12.1.1.5</u>: Restrictive – recommend removal. Does not provide ability to respond to current economy and consumer trends.</p> <p>16. <u>Policy 12.1.1.6</u>: Restrictive – does not provide ability to respond to current economy and consumer trends. Modify to state clearly how concentration of jobs is to be defined and to provide greater flexibility for MU developments to accommodate appropriate non-res uses.</p> <p>17. <u>Policy 12.1.3.5</u>: Too restrictive: replacement of floor office spaces may be unfeasible within UGC Office Lands– does not represent the current market and community needs.</p>	<p>12. Lands designated Mixed Use are intended to offer much-needed supportive services and jobs in order to sustain complete communities. Changes have been introduced to use a formula and percentages relative to the area size.</p> <p>13. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. OLT in its decision will need to determine if any of the policies in the MOPAs can be appealed as per the planning Act. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p> <p>14. Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>15. The policy was deleted from the Downtown Core Chapter. But continues to apply to Growth Centres and Nodes with a slight change to allow for flexibility.</p> <p>16. Policy uses a “may be required” statement, allowing for adaptation and filtering through a lens of evolving community contexts and market trends.</p> <p>17. Policy only applies to lands designated Office. Office uses are to be directed to MTSAs as per provincial directions.</p>
30	GSAI on behalf of Park Heights Ltd (65 Park St E) (letter #33, dated March 15, 2024)	<p><u>1</u>: 5.2.2</p> <p><u>2</u>: 5.2.4</p> <p><u>3</u>: 5.2.5 &amp; Table 5.1</p> <p><u>4</u>: Policy 5.2.7</p> <p><u>5</u>: Policy 5.3.4.3, 5.3.4.4</p> <p><u>6</u>: 5.3.4.7</p> <p><u>7</u>: 13.1.1.3, 13.1.1.4</p> <p><u>8</u>: 13.1.1.5</p> <p><u>9</u>: 13.3.2.1 &amp; 13.3.2.3</p>	Restrictive Policies & Greater Incentives	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policy 5.2.7</u>: Policy should be revised to clarify affordable units to be required in strategic locations (MTSAs) where IZ is applicable.</p> <p>5. <u>Policy 5.3.4.3 &amp; 5.3.4.4</u>: Replacement of rental units are prohibitive and restrictive. Policies do not account for very old rental buildings. The threshold of 6 units is too low and could be cost prohibitive for redevelopment projects.</p> <p>6. <u>Policy 5.3.4.7</u>: More flexible language should be integrated. Demolition permissions should also be added. If City wants incorporation of affordable housing, there should be greater incentives.</p> <p>7. <u>Policy 13.1.1.3 &amp; 13.1.1.4</u>: Restrictive - request for greater flexibility.</p> <p>8. <u>Policy 13.1.1.5</u>: Disagree with “however, not all of these uses will be permitted in all areas” – seems to contradict the first part of the policy – should be more flexible.</p> <p>9. <u>Policy 13.3.2.1 &amp; 13.3.2.3</u>: Disagree with max heights in OP – should be evaluated on site-by-site basis.</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: “<i>The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.</i>”</p> <p>4. Although not required, affordable housing units are encouraged outside of MTSAs, where IZ is not applicable. The policy speaks to the role of all levels of governments in the creation of more affordable units.</p> <p>5. The policies are in keeping with the City’s in-force and effect Rental Housing Protection By-Law 0121-2018, which is implemented under Section 99 of the Municipal Act. Council-endorsed guidelines define ‘similar rents’ as the last rent paid by the tenant with an increase no higher than the annual Provincial Guideline and a one-time capital allowance of 3%.</p> <p>6. See 5 above.</p> <p>7. Nodes as SGAs are expected to provide for highest employment densities to enable the City to meet its employment targets and create complete communities. Policy has been updated to provide for more flexibility.</p> <p>8. This policy allows the mix of uses to be determined on a site-by-site basis, based on local context.</p> <p>9. 13.3.2.1 was deleted. The site is subject to PMTSA heights as per schedule 8. Heights have been evaluated as part of the PMTSA studies.</p>
31	GSAI on behalf of Creekside Industrial GP Inc. (0 Tahoe Blvd)	<p><u>1</u>: 8.2.6 &amp; 8.6.11</p> <p><u>2</u>: 9.1.4</p> <p><u>3</u>: 9.3.1</p> <p><u>4</u>: 10.2.13.1</p>	Policy Revision & Restrictive Policies & Modification	<p>1. <u>Policies 8.2.6 &amp; 8.6.11</u>: Policies are concerning and require modification – inflexible as written. Sustainable and best practices should be determined on a site-by-site basis.</p>	<p>1. Policies generally adopt an encouragement tone that sees the City take the leadership to promote the creation of sustainable and attractive built form.</p> <p>2. This policy mainly intends to encourage employment diversification and growth by ensuring compatible employment uses locate together to support that diversity.</p>

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	(letter #34, dated March 15, 2024)	<u>5</u> : MOPA 143 & 144 <u>6</u> : 15.4.7.1 & 15.4.7.2 <u>7</u> : Email List		<p>2. <u>Policy 9.1.4</u>: Request for policy modification – increase flexibility and recognize that appropriate employment-related uses and sufficient employment-related density can be provided in a number of ways.</p> <p>3. <u>Policy 9.3.1</u>: Warehousing is being characterized as an industrial use, which is a deviation from the in-effect policy framework. As currently drafted, the policy would have indirect effect of restricting industrial uses from being able to locate within certain Employment Areas.</p> <p>4. <u>Policy 10.2.13.1</u>: warehousing, distributing and wholesaling are permitted uses on BE lands that have been removed. Request the warehousing permission to be maintained.</p> <p>5. <u>MOPA 143 &amp; 144</u>: Lands are within the Tahoe Projected Major Transit Station Area (PMTSA) and designated Business Employment with a minimum building height of 2 storeys. Do not support the inclusion of the lands within the Tahoe PMTSA given the locational attributes, development constraints and surrounding context.</p> <p>6. <u>Policy 15.4.7.1 and 15.4.7.2</u>: Employment Areas are designated for clusters of business and employment activities including manufacturing, research and development, offices, warehousing, etc.. This statement is contrary to the land use permissions outlined in 15.4.7.1 and 15.4.7.2.</p> <p>7. Client wishes to be kept informed of updates and future meetings.</p>	<p>3. Employment areas within PMTSAs are designated through provincial requirements to allow the City to meet its jobs targets. Land intense uses such as warehousing which provide fewer jobs do not enable the PMTSA to fully meet its growth potential.</p> <p>4. The business employment uses does permit a diverse set of uses as well as accessory uses according to context.</p> <p>5. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. OLT in its decision will need to determine if any of the policies in the MOPAs can be appealed as per the planning Act. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p> <p>6. This has been updated.</p> <p>7. Noted- added to distribution list.</p>
32	Goodmans LLP on behalf of Mississauga I, II & III GP Inc. (letter #35, dated March 14)	General	General comment	<p>1. Request for greater flexibility and consideration for changing market realities.</p>	<p>1. Many flexible policies allowing for additional heights especially within MTSA have been added.</p>
33	GSAI on behalf of Derry Britannia Development Ltd (letter #36, dated March 15, 2024)	<u>1</u> : 5.2.2 <u>2</u> : 5.2.4 <u>3</u> : 5.2.5 & Table 5-1 <u>4</u> : 8.4.1.17 <u>5</u> : 8.4.5.2 <u>6</u> : 8.6.2.5 <u>7</u> : 10.2.5.8 <u>8</u> : MOPA 143 & 144 <u>9</u> : 14.13.2.15 <u>10</u> : 14.13.3.9 & 14.13.3.10	Policy Revision	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5-1: Affordable Housing</u>: Questioning appropriateness of percentages on a smaller scale (City). Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing.</p> <p>4. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>5. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and intended users.</p> <p>6. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>Policy 10.2.5.8</u>: Conflicting with policies in Section 8.6.1. Disagree with limitation of built form height based on ROW it fronts. Also height requirement of 'Residential Mid-Rise' of at least 5 storeys is contrary to height related policy directions in Section 8.6.1 &amp; Ninth Line Neighbourhood Character Area policies. The application of 'Residential Mid-Rise' across the site will impact the agreed upon and approved development vision for Subject Lands. Concerning and requires revision.</p> <p>8. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules is concerning.</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: "The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</p> <p>4. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>5. Policy deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>7. The designation sets the directives for how residential lands will be developed, where's policy 8.6.1 defines a mid-rise built form and proportions for a building that can be used for residential, mixed use or other types of uses. Additional height requirements could be set by Character Area policies. Those will take precedence over designation heights.</p> <p>8. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. OLT in its decision will need to determine if any of the policies in the MOPAs can be appealed as per the planning Act. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p> <p>9. Policy updated.</p> <p>10. Height ranges were determined through a rigorous planning process due to the areas geographic and environmental constraints. Alternative heights can be determined if found appropriate through the development review process.</p>

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				<p>9. <u>Policy 14.13.2.15</u>: Policy is concerning and out-of-date. The 407 Transitway alignment has been finalized. Policy is also contrary to evolving Provincial policy directions, specifically that the Parkway Belt West Plan is to be rescinded. Request policy removal.</p> <p>10. <u>Policies 14.13.3.9 &amp; 14.13.3.10</u>: Diverging height limits identified. Request for policies to be revised and condensed to allow for a range of ground-oriented and mid-rise built forms that do not exceed the 6 storeys permission, consistent with the Britannia 407 PMTSA lands.</p>	
34	SmartCentres on behalf of lands at Derry Rd & Hurontario St (letter #37, dated March 15, 2024)	<u>1</u> : Policy 10.2.8	Policy Revision	<p>1. Request to broaden the permitted uses within the Subject Lands and redesignate lands to Mixed Use Limited for lands within the NEF-35 Contour Limits, and Mixed Use for those outside the NEF-35 Contour Limits for maximum flexibility of redevelopment.</p> <p>2. If Council does not agree to a redesignation, request for additional uses listed below to be identified under the Office and Business Employment land use designations:</p> <ul style="list-style-type: none"> <li>• Residential, in conjunction with other permitted uses;</li> <li>• Retail Store;</li> <li>• Financial Institution;</li> <li>• Restaurant;</li> <li>• Self Storage Facility; and</li> <li>• Warehousing, distributing and wholesaling.</li> </ul> <p>3. Request for minimum storey limit be reduced.</p>	<p>1. Lands previously designated office have been redesignated Business Employment.</p> <p>2. Provincial policies in PPS, 2024 prohibit new residential development and other sensitive land uses in areas near airports above 30 NEF/NEP. Additionally, future uses must conform with those permitted within Employment Areas as per the Planning Act.</p> <p>3. The lands are located within the Derry MTSA that is to be planned for a minimum density of 160 PPJ/ha. The minimum building height for the subject lands is 3 storeys, which will help achieve this target.</p>
35	GSAI on behalf of Eight Acres Ltd. (2434-2490 Shepard Ave) (letter #38, dated March 15, 2024)	<u>1</u> : 5.2.2 <u>2</u> : 5.2.4 <u>3</u> : 5.2.5 & Table 5.1 <u>4</u> : 8.4.1.17 <u>5</u> : 8.4.5.2 <u>6</u> : 8.6.2.5 <u>7</u> : Ch. 11 <u>8</u> : Map 12-1.2 <u>9</u> : 12.3.2.1 <u>10</u> : 12.5.4.2 <u>11</u> : 12.6.3.2	Policy Revision	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without defining what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage (20% or less) of larger, family-sized units.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5.1</u>: Challenge for the delivery of housing units. Also, requirements for affordable units contrary to in-effect Provincial and Regional policy objectives, where affordable housing is legislated in Inclusionary Zoning Areas.</p> <p>4. <u>Policy 8.4.1.17</u>: Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>5. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and intended users. <i>"Privately owned publicly accessible spaces will be designed in accordance with shall have regard for the city's standards for public open spaces."</i></p> <p>6. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p> <p>8. <u>Map 12-1.2</u>: Map showcasing pedestrian connections and park locations can restrict flexibility and have potential adverse effects on the development potential and design of the Site. Clarity desired in policy to request that Location of these amenities should be determined on site-by-site basis.</p> <p>9. <u>Policy 12.3.2.1</u>: Concerns with UD-related policies (45-degree angular plane &amp; 30m tower separation distance) – inappropriate and problematic. Should be modified to</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>"The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</i></p> <p>4. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>5. Policy deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>7. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. OLT in its decision will need to determine if any of the policies in the MOPAs can be appealed as per the planning Act. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p> <p>8. Map shows conceptual general locations to be refined in the future.</p> <p>9. Both policies around the 45-degree angular plane and 30m separation distance are prefaced with the word "generally" to provide for more flexibility in the application of these tools.</p> <p>10. Policy establishes a height regime that is consistent with the OP framework and follows the requirements under the Planning Act.</p> <p>11. Policy is part of the PMTSA framework to allow for height flexibility. Additional heights can be achieved as prescribed by the Planning Act.</p>

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				<p>increase flexibility and to recognize that appropriate transitions can be provided in various ways.</p> <p>10. <u>Policy 12.5.4.2</u>: Concerned with identified max building heights. Policy does not consider evolving context or changing market trends – developer should base non-res area on specific context.</p> <p>11. <u>Policy 12.6.3.2</u>: Does not adequately accommodate community context or evolving market trends. Suggest policy be revised to enable additional height through different evaluation criteria (not by providing additional non-res areas).</p>	
36	Conservation Halton (letter #39/40.1, dated April 3, 2024)	<p><u>1</u>. Figure 4.3, <u>2</u>. 4.3.4 <u>3</u>. 4.3.8 <u>4</u>. 4.3.1.3 <u>5</u>. 4.3.1.6 <u>6</u>. 4.3.1.7 <u>7</u>. 4.3.1.8 <u>8</u>. 4.3.3 <u>9</u>. 4.3.3.11 <u>10</u>. 4.3.3.14 <u>11</u>. 4.3.3.15 <u>12</u>. 4.3.3.21 <u>13</u>. 10.2.3.8 <u>14</u>. 14.13</p>	Figure update & policy revisions	<p>1. <u>Figure 4.3</u>: Update Figure to include all Natural Hazard Land components that are within the Natural Hazard definition (i.e. River and streams) &amp; clarify meaning of “untreated wetland” – not in Glossary.</p> <p>2. <u>Policy 4.3.4</u>: recommend referencing “Natural Hazards” in addition to NHS.</p> <p>3. <u>Policy 4.3.8</u>: Update policy to reflect CA requirements - include Natural Hazards within reference. O.Reg. 41/24 contains full list of regulated features. CAs regulate 15m from greatest hazard associated with watercourse, 30m from limit of wetland and 15m from the greatest hazard associated with Lake Ontario shoreline.</p> <p>4. <u>Policy 4.3.1.3</u>: Note that any refinements to Natural Hazards should be in “Consultation with the appropriate CA”.</p> <p>5. <u>Policy 4.3.1.6</u>: To ensure consistency with PPS, add policy to state that lot creation should not be permitted within Natural Hazard Lands.</p> <p>6. <u>Policy 4.3.1.7</u>: Update policy – state development and site alteration activities will also not be permitted within ‘other wetlands’ and areas regulated by a CA without prior approval.</p> <p>7. <u>Policy 4.3.1.8</u>: Update policy – include ‘other wetlands’ in list of features.</p> <p>8. <u>Policy 4.3.3</u>: Within general wording provided at beginning of section, reference ‘unstable slopes, soils and bedrock’.</p> <p>9. <u>Policy 4.3.3.11</u>: If appropriate, include requirement for ‘Erosion and Sediment Control Study’ within policies referencing ‘development and site alteration’.</p> <p>10. <u>Policy 4.3.3.14</u>: Add note – studies/assessments should be to satisfaction of City and appropriate CA.</p> <p>11. <u>Policy 4.3.3.15</u>: ‘Erosion rehabilitation study’ not defined in glossary. Clarity should be provided as to the requirements of this study.</p> <p>12. <u>Policy 4.3.3.21</u>: Update policy - any development/site alteration on lands subject to flooding should be in consultation with appropriate CA &amp; may require approval by the CA.</p> <p>13. <u>Policy 10.2.3.8</u>: Add following to policy: “<i>Development in regulated areas is subject to approvals by the appropriate conservation authority</i>”</p> <p>14. <u>Policy 14.13</u>: Update policy as follows: <i>a. The Ninth Line Neighbourhood includes lands designated for development that are currently affected by regulatory flooding and erosion hazards, and/or that contain wetlands. b. The limits of existing watercourses, flooding and erosion hazards, and wetlands are anticipated to be altered in some areas in accordance with the Ninth Line Lands Scoped Subwatershed Study (SWS) and 407 Transitway (West of Brant Street to West of Hurontario Street) Environmental Assessment (EA; October 2020). As per the Scoped SWS, Comprehensive Environmental Impacts and Integration Studies (CEIISs) are required in support of development applications in this area. CEIISs will fully evaluate and confirm the Natural Heritage System (NHS) feature and hazard limits, buffers and management strategies in order to confirm the limits of the NHS, stormwater management and development blocks.</i></p>	<p>1. Updated. And these are examples as part of a figure and not listed anywhere in policies. There is no need to define.</p> <p>2. This policy only applies to the conservation authorities NHS designated lands as they can be different than the City’s NHS.</p> <p>3. Updated.</p> <p>4. Noted.</p> <p>5. 4.3.3.1 and 4.3.3.21 do not allow any site alteration within Natural hazard lands.</p> <p>6. Other wetlands are generally part of the City’s Significant Natural Areas and are protected by policies such as 4.3.1.18 or 4.3.1.19.</p> <p>7. Most other wetlands are included within Significant Natural Areas.</p> <p>8. Updated to include suggested language.</p> <p>9. We may require additional studies if necessary as per policy 17.4.8 as well as 17.4.10 and 4.3.3.10.</p> <p>10. Policy updated as requested.</p> <p>11. Not required to be defined in the OP as it may be defined in other documents.</p> <p>12. The policy is prohibiting such development.</p> <p>13. Added.</p> <p>14. Policies will be updated in accordance with the findings of these studies, once completed.</p>
37	WSP Canada Inc. on behalf of CN Rail (letter	Policy 4.8.2	Policy Concern	<p>1. Policy states that sensitive land uses may be permitted next to major facilities IF adverse effects can be mitigated. This is problematic and does not follow the mandates in sections 1.2.6.1 &amp; 1.2.6.2 of the PPS (2020).</p>	<p>1. Policies 4.8.2 and 4.8.3 have been updated to address the comment and better align with sections 3.3 and 3.4 of the PPS 2024.</p> <p>2. Added to mailing list.</p>

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	#40, dated March 18 2024)			2. Will be providing a follow-up letter with additional comments. Request to be kept up-to-date throughout the process.	
38	Sajecki Planning on behalf of Edenshaw (letter #41, dated March 18, 2024)	<p><u>1.</u> Policy 5.2.4  <u>2.</u> Policy 5.3.3  <u>3.</u> 8.5.2.2.h, 8.5.2.5 &amp; 8.5.2.7  <u>4.</u> 10.2.5.10  <u>5.</u> 12.1.2.6 &amp; 13.1.2.6  <u>6.</u> 13.2.3.4.4.b, 13.3.3.4.4.b  <u>7.</u> 13.2.5.2.2  <u>8.</u> 14.1.1.10</p>	Repeat comment from Bundle 3, Restrictive Policies	<p>1. <u>Policy 5.2.4: Clarification:</u> if unit mix is now only encouraged, what is the purpose of identifying criteria where a reduced requirement would be considered? Mix of uses should be determined based on the market.</p> <p>2. <u>Policy 5.3.3: Clarification:</u> Introductory language should clarify that affordable housing is only available through IZ policies within PMTSAs.</p> <p>3. Policies speak to need for 'appropriate transitions' however, little guidance on intent of policies from outcome-based perspective. Policies are overly prescriptive – should instead examine what is 'appropriate'.</p> <p>4. <u>Policy 10.2.5.10:</u> Concerned with this policy for Residential High-Rise Lands, that if no heights are specified in Character Area or Special Site provisions, the max height cannot exceed tallest building on property.</p> <p>5. <u>12.1.2.6 &amp; 13.1.2.6:</u> Intent of policy unclear: if intent is to replace # of surface parking, then it doesn't seem to align with City objectives to reduce parking. However, should be made clearer if intent is to replace with underground or structured parking.</p> <p>6. <u>Policy 13.2.3.4.4.b &amp; 13.3.3.4.4.b:</u> 30m tower separation is still not reflective of compact urban development. Request for minimum to be revised to <u>25m</u>.</p> <p>7. <u>Policy 13.2.5.2.2:</u> Not reflective of market conditions – too restrictive. Remove minimum requirements for provision of non-residential use.</p> <p>8. <u>Policy 14.1.1.10:</u> Clarification - why are only Neighbourhood Arterials included? Which Major Collectors are intended to be included and what areas surrounding an intersection are covered by this policy?</p>	<p>1. The policy is an encouragement because context is different and flexibility is needed.</p> <p>2. Although not required, affordable housing units are encouraged outside of MTSA's, where IZ is not applicable.</p> <p>3. Policies cannot be found in the OP.</p> <p>4. The policy establishes a height range that fits each context. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</p> <p>5. Each proposal for redevelopment will be considered on a site-specific basis and the appropriate parking requirements.</p> <p>6. The separation distance is prefaced with the word "generally" meaning that 30m of separation should be a goal and the policy would allow for variation according to context.</p> <p>7. Policy is necessary to protect important office space within SGAs.</p> <p>8. In Neighbourhood, policies are intended to introduce various levels of intensification based on the area within the neighbourhood.</p>
39	Plan Logic on behalf of Ahmed Group (various properties) (letter #42/43.1, dated March 18, 2024)	<p><u>1.</u> Policy 5.3.1.7  <u>2.</u> Policies 6.2.9  <u>3.</u> 7.3.3.2  <u>4.</u> Policies 8.3.6  <u>5.</u> 8.4.5.8  <u>6.</u> 8.6.3.8  <u>7.</u> 8.3.12., 8.6.3.14.d &amp; 17.4.10  <u>8.</u> 8.4.1.17, 8.6.2.5, &amp; 10.2.5.8.b  <u>9.</u> 14.1.1.4.c  <u>10-13:</u> MOPA 141, 143 &amp; 144  <u>14:</u> Table 11-1, Schedule 8g (mislabelled 11g in MOP 2051), &amp; policies 11.3.1, 11.3.2, 11.3.4.d  <u>15:</u> 11.9.2  <u>16:</u> General  <u>17:</u> 11.3.4.e  <u>18:</u> 11.12.3.k  <u>19:</u> 13.3.12.3.2  <u>20:</u> 16.127.2</p>	Policy deletion, Exemption Request, Revision, New Policy Suggestion & Revision to definition	<p>1. <u>Policy 5.3.1.7:</u> Suggest policy regarding seniors housing to be located outside of Neighbourhoods be deleted – Subject Site allows for walkability and transit access.</p> <p>2. <u>Policy 6.2.9:</u> Not defensible to the extent that it requires identification and conservation of "intangible" cultural resources, whereas paragraphs 1-9 of subsection 1(2) of O.Reg 569/22 states specific criteria for the evaluation of cultural heritage resources.</p> <p>3. <u>Policy 7.3.3.2:</u> Request exemption of properties at 15, 19, 23 &amp; 27 Pearl Street from required separation between traffic lanes and sidewalks due to desire to introduce enhanced landscaping between sidewalk and front wall of proposed buildings.</p> <p>4. <u>Policy 8.3.6:</u> Too restrictive – policy should support land assembly within Neighbourhoods as well.</p> <p>5. <u>Policy 8.4.5.8:</u> Request similar exemption as one in this policy regarding outdoor at grade amenity area for new apartment developments within Neighbourhoods.</p> <p>6. <u>Policy 8.6.3.8:</u> Request exemption from policy – have hired consultants to advise on stormwater management regarding proposed development. Policy too restrictive and should be more site specific.</p> <p>7. <u>Policies 8.3.12., 8.6.3.14.d &amp; 17.4.10:</u> request exemption from policy regarding tree preservation due to size of sites (15, 19, 23 &amp; 27 Pearl St.).</p> <p>8. <u>Policies 8.4.1.17, 8.6.2.5, &amp; 10.2.5.8.b:</u> Policies are onerous – requirement of 45-degree angular plan (8.6.2.5) &amp; a relationship to ROW (8.4.1.17) &amp; the limit of max. building height to not exceed the width ROW (10.2.5.8). Request deletion.</p> <p>9. <u>Policy 14.1.1.4.c:</u> Too restrictive – fails to recognize the carrying capacity of QEW highway, or Confederation Parkway Strategic Growth Area Major Collector. These should be recognized in policy.</p> <p>10. <u>MOPA 141:</u> MOPA is Regional approval or subject to pending appeals. Oppose height limitations imposed within this or any MTSA.</p> <p>11. <u>MOPA 143 &amp; 144:</u> Both proposed new MTSA policies are either awaiting Regional approval or subject to pending appeals.</p>	<p>1. This policy is stated as an encouragement, suggesting that housing for older adults be located within the UGCs, Major Nodes, Community Nodes and within MTSA's as these provide for better access to amenities, active transportation and transit.</p> <p>2. Intangible Heritage consists of nonphysical intellectual wealth, such as <a href="#">folklore</a>, <a href="#">customs</a>, <a href="#">beliefs</a>, <a href="#">traditions</a>, knowledge, and <a href="#">language</a>. That is included in O. Reg. 569/22, under the following:</p> <p>"4. The property has historical value or associative value because it has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community.</p> <p>5. The property has historical value or associative value because it yields, or has the potential to yield, information that contributes to an understanding of a community or culture."</p> <p>O. Reg. 569/22 is specific to actions which fall under the OHA. The OHA does not govern all aspects of heritage across the province, but sets out provincial priorities and interests and sets out specific actions; listing on the heritage register, designation, etc. under that Act. Actions such as interpretation are not covered under the OHA, nor do we use processes under the OHA to achieve said outcomes.</p> <p>Intangible heritage addresses the aspects of heritage which are not physical but still hold cultural heritage to the community. Providing specific policy within the OP allows for the City to conserve stories where they occurred, uphold Indigenous identity, and share the stories of Mississauga for which no physical manifest exists, but the memory of which endures. The <a href="#">2016 Heritage Management Strategy</a>, which was adopted by Council, as well as UNESCO.</p> <p>3. Policy 7.3.3.2 provides some best practices for streets and streetscape treatment and design, as an example, that the design of streetscapes should include a separation of drive lanes with sidewalks due to the positive impact on pedestrian safety and security. As this is an example it may not apply everywhere. Street appropriate treatment to streetscape will be pursued during re-development in accordance with applicable best practices.</p>



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	<p><u>21-23:</u> Section 16</p> <p><u>24:</u> Ch. 18-4</p> <p><u>25:</u> 10.2.5.10</p>	<p>12. <u>MOPA 144:</u> MOP 2051 indicates Subject Sites as being within an Employment Area &amp; Dixie Employment Area. Policy 9.3.2 protects employment areas &amp; 15.5.1 prohibits land conversions, only considering them through the MCR process. The Province however removed the Subject Sites from the PSEZ seeing their value in providing non-employment uses. Also, in new ROP, Subject Sites are not designated as Employment Areas (Schedule E-4). Request removal of lands from Employment Commercial, Employment Area and Dixie Employment Area to conform to the new ROP.</p> <p>13. <u>MOPA 144 (also Schedule 8g):</u> Max. height limit of 9 storey is restrictive given the site's location/context, and doesn't support MOP 2051's directive for growth around MTSA's.</p> <p>14. Request exemption of Subject Sites from Table 11-1 &amp; policies 11.3.1, 11.3.2 &amp; 11.3.4.d</p> <p>15. <u>Policy 11.9.2:</u> Request policy revision to add "<i>to the extent possible</i>" – no playground within 400m of Subject Sites. There is however the Hawkins Glen Park which is approx. 400m from site – City can build playground there.</p> <p>16. <u>General:</u> Add policy that recognizes the significant transportation capacity &amp; heights available for sites close to the QEW interchanges or properties fronting onto Major Collector Roads.</p> <p>17. <u>Policy 11.3.4.e:</u> Confirm that the City's consultants (Dillon Consulting) will review Rowan Williams Davies &amp; Irwin Inc's (RWDI) compatibility study for the Subject Sites.</p> <p>18. <u>Policy 11.12.3.k:</u> Request exemption from policy – policy does not support noise attenuation walls that RWDI consultants have suggested.</p> <p>19. <u>Policy 13.3.12.3.2:</u> Request to exempt properties 15, 19, 23 &amp; 27 Pearl Street from Streetsville Heritage Conservation District – these buildings do not have any cultural heritage value. Ahmed Group wants to temporarily use these properties for surface parking while the City processes the development applications for purpose-built rental. They will hire heritage consultant to prepare assessment report at appropriate time.</p> <p>20. <u>Policy 16.127.2:</u> Request deletion of policies – serves no legitimate planning purpose but to prevent land owner from having application to amend MOP 2051. The land owner's consultants (RWDI) have already completed the compatibility study and a municipally led one will lead to same results. This policy also prevents land owner from processing OPA and ZBA.</p> <p>21. Request new policy be added to section 16 to exempt 6045 Hurontario St from parking structure requirements mentioned in 7.6.8.a, 7.6.10.e &amp; 8.3.11. Not feasible for Subject Site.</p> <p>22. <u>Policy 8.3.11:</u> Replace "public street" with "public realm". Buildings fronting onto Queen St. S. &amp; Streetsville Village Square should prioritize future retail land uses.</p> <p>23. <u>Policy 7.6.10:</u> Incorporate "where appropriate" to Section 7.6.10.e</p> <p>24. Request first sentence of 'compatible' definition be replaced with: "<i>means development that does not introduce unacceptable adverse impacts</i>". "<i>enhances the site and surrounding area</i>" is too vague, subjective, with no quantitative tests to measure conformity.</p> <p>25. <u>10.2.5.10:</u> Concerned with this policy for Residential High-Rise Lands, that if no heights are specified in Character Area or Special Site provisions, the max height cannot exceed tallest building on property.</p>	<p>4. Policy 8.3.6 supports land assembly in SGAs from an efficiency stand point, since SGAs offer greater access to social ad physical infrastructure and requires higher densities. This may not be the case for all areas within neighbourhoods.</p> <p>5. Generally, since neighbourhoods are primarily residential areas, amenities at grade could provide for better access for the entire neighbourhood. A site specific exemption could be contemplated during development depending on the site.</p> <p>6. This policy (existing policy 9.5.2.7) represents good planning especially in light of changing climate. If an alternative treatment is needed this would be best addressed during the development review process.</p> <p>7. Exemptions cannot be granted through an Official Plan Review as it is not an appropriate process to discuss site specific conditions.</p> <p>8. These policies ensure a good relationship between buildings and the public realm. They, for the most part, enhance the area and create a human scale. The language generally used is "relating" which intends to establish a connection between the different components of the built form. Policy 8.6.2.5 has been modified to allow for more flexibility. Policy 10.2.5.8 has also been modified to eliminate ROW requirement.</p> <p>9. Chapter 15 contains policies regarding Neighbourhoods. This policy directs higher density uses within Neighbourhoods to locate along Neighbourhood Arterials because those arterials are subject to the policies within this chapter.</p> <p>10. to 14. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. The MTSA policies have been integrated into the OP with modifications and allow for the consideration of additional building heights in excessive of the maximums subject to criteria.</p> <p>15. There is no need for additional language as "generally" provides the needed flexibility.</p> <p>16. There is a number of policies that speak to the encouragement of intensity to areas and nodes that are in proximity to major Provincial highway interchanges as well as Major Collectors. Policy 8.4.3.1 speaks to the gateway treatment through, for example, the massing of buildings and others. Other policies speak to the permission of additional heights and densities through a local area review along Neighbourhood Arterials, select Major Collectors and Regional Arterials.</p> <p>17. This discussion is not under the purview of the Official Plan Review.</p> <p>18. The OP review is a high-level process through which the City's general policies are reviewed and updated. Site specific policies, exemptions and studies are not part of the OP review.</p> <p>19. The OP review is a high-level process through which the City's general policies are reviewed and updated. Site specific policies, exemptions and studies are not part of the OP review.</p> <p>20. Policy will be updated once the City's study is completed.</p> <p>21. The OP review is a high-level process through which the City's general policies are reviewed and updated. Site specific policies, exemptions and studies are not part of the OP review.</p> <p>22. Is currently "public realm" in February 2024 MOP 2051 draft.</p> <p>23. Policy 7.6.10 already begins with "In appropriate locations", stating the City's potential and interest to partner with private developers to provide off-street parking. The objectives within the policy, including e, are prefaced with the term "investment [...] should be", therefore providing room for discussion should all the objectives not be accounted for.</p> <p>24. Proposed language is already part of the "compatible" definition as found in the OP glossary.</p> <p>25. The policy establishes a height range that fits each context. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures</p>



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					that development within these areas is generally through infill that is sensitive to such context.
40	Maple and Co. Consulting on behalf of 1830 South Sheridan Way (letter #43, dated March 15, 2024)	<u>1</u> : Policy 16.5.2.2	Redesignate Subject Lands	1. Request to redesignate the lands to Residential Low-Rise II due to its location west of Clarkson Rd (more intensive neighbourhood character), the presence of more dense building forms on adjacent lands, the land's adjacency to the Sheridan Mall-based Community Node, 4-storey, vertically divided and grade-related back-to-back townhomes are becoming a more common housing option in the City, and the current preparation of a 4-storey back-to-back townhouse development on the site.	1. Property has been re-designated Low Rise I which increases development potential from detached only to many forms of low-rise dwellings. If additional height or development permissions are needed, they should be examined through the development approval process to ensure proposed development is compatible with immediate context.
41	Haven Developments on behalf of 2175 Royal Windsor Drive (1252705 Ontario Ltd.) (letter (email) #44, dated March 18, 2024)		Follow up	1. Desire to stay informed/sent any further policy considerations regarding the Clarkson Transit Station Area Study.	1. Added to distribution list.
42	GSAI on behalf of 1425 Dundas Street (letter #45, dated March 18, 2024)	<u>1</u> : 5.2.4 <u>2</u> : 5.2.5 and Table 5.1 <u>3</u> : 11.3.2 <u>4</u> : Ch. 11	Policy Revision	<p>1. <u>Policy 5.2.4: Affordable Housing</u>: While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. Suggested modification: <i>"To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may consider a lower diversification of housing types and sizes where development is providing..."</i> If percentage is to remain, request that policy be amended to encourage a reduced percentage of family-sized units to be provided.</p> <p>2. <u>Policy 5.2.5 &amp; Table 5.1</u>: Affordable Housing: Questioning appropriateness of percentages on a smaller scale (City). Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing.</p> <p>3. <u>Policy 11.3.2</u>: Request for clarity on policy – is City requiring 1-to-1 replacement of non-residential GFA (which they find inappropriate and infeasible) OR if the quality of the non-residential uses are to be sufficient to continue to service the area (determined through a Market Study or similar). Suggested re-wording: <i>"Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment. that the replacement non-residential GFA is satisfactory to continue to service the area or community."</i></p> <p>4. <u>MOPA 143 &amp; 144</u>: Inclusion of MTSA policies may be premature considering amendments are still subject to Region of Peel approval. What is shown on schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Maximum heights too restrictive. Applying a 25 storey height cap renders the urban hierarchy moot. Worried that if adopted, the height policies in MTSA will be non-appealable.</p>	<p>1. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>2. Policies have been modified using a formula based that better suites the size of the site and provides more clarity and flexibility. purpose and scope of the non-residential uses.</p> <p>3. The Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p> <p>4. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. OLT in its decision will need to determine if any of the policies in the MOPAs can be appealed as per the planning Act. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p>
43	CVC (letter #46, dated March 4 & 19, 2024)	<u>1</u> : 4.2.12 <u>2</u> : Figure 4.3 <u>3</u> : 4.3.1.5 <u>4</u> : 4.3.1.6 <u>5</u> : 4.3.1.7 <u>6</u> : 4.3.1.9 <u>7</u> : 4.3.1.29 <u>8</u> : 4.3.3	Policy Modifications	<p>1. <u>4.2.12</u>: Potential to speak to offsetting losses incurred by City through infrastructure projects. Consider adding clause requiring compensation for unavoidable losses on City-owned land. Also, when speaking about planting, add language to discourage tree removal but promotes offsetting as applicable.</p> <p>2. <u>Figure 4.3</u>: Confusing – what is an untreated valleyland? Watercourses should be included within hazard sphere if figure were to remain.</p> <p>3. <u>4.3.1.5</u>: Opportunity to promote Woodland/Wetland Management Plan when applicable for lands deeded to City as part of NHS.</p>	<p>1. These matters are dealt with through the Bylaw.</p> <p>2. Added "rivers and streams" per CH's comment.</p> <p>3. Already covered under policies such as 4.3.2.7.</p> <p>4. Noted.</p> <p>5. Already included in 4.3.8 as explained above.</p> <p>6. Policy (now 4.3.1.9) is to remain as is, as the City will determine if trails can be permitted with minimal impact to wetlands.</p> <p>7. Noted.</p>

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		<u>9:</u> 4.3.3.11 <u>10:</u> 4.3.3.15 <u>11:</u> 4.3.3.16 <u>12:</u> 4.3.3.24 <u>13:</u> 4.3.1.5.g		4. <u>4.3.1.6:</u> Policy supported by CVC staff and recommend no new lot be created within Natural Hazard Lands. Should be explicitly stated to avoid future development where this can occur. 5. <u>4.3.1.7:</u> Include wetlands, not only PSWs/coastal wetlands. 6. <u>4.3.1.9:</u> Suggestion to remove term “trail” and replace with boardwalk, as to minimize impact within PSWs. 7. <u>4.3.1.29:</u> Conservation authority’s (CA) offsetting requirements may exceed requirements determined by City in areas where residential woodland forms part of natural hazard regulated by CA. 8. <u>4.3.3:</u> Consider including wetlands & unstable soils as natural hazards (consistent with CA Act requirements). 9. <u>4.3.3.11:</u> First introduction of Erosion and Sediment Control requirements – consider adding policy in earlier section relating to protection of natural hazards & features 10. <u>4.3.3.15:</u> Revised - Intent of policy unclear. 11. <u>4.3.3.16:</u> Reference to approval CA should be included, as typically, development in proximity to watercourse will likely be regulated by CA. 12. <u>4.3.3.24:</u> State that safe access must be available to sites that development is proposed for. 13. <u>4.3.1.5g:</u> Is offsetting the intent of the policy? If so, make clear by saying development within NHS is discouraged, but if it occurs, offsetting is expected.	8. Updated to add “wetlands, unstable soils” to 4.3.4 Natural Hazard Lands. 9. Noted, however it would be repetitive as most policies related to Natural Hazards are grouped together. 10. Noted. 11. Reference to CA added at end of policy (now 4.3.4.16). 12. Updated as per comment. 13. Noted.
44	Dunpar Developments Inc. (letter #48, dated March 18, 2024)	<u>1:</u> 4.10.4 <u>2:</u> 5.3.4.3-5.3.4.7 <u>3:</u> 10.2.5.9-10.2.5.10 & 10.2.6.3	Restrictive Policies	1. <u>Policy 4.10.4:</u> Policies directed at Brownfield Sites – onerous policies for environmental remediation. Duplicates the Record of Site Condition under the EPA but with a broader scope. 2. <u>Policies 5.3.4.3 to 5.3.4.7:</u> Restriction of demolition or conversion of residential rental units in properties with 6 or more units is overly restrictive and include requirements which exceed the City’s authority under the Planning Act, including the direction that “similar rents are defined as the last rent paid by the tenant”. 3. Policies in chapter 10 are more restrictive than the in-force OP: <ul style="list-style-type: none"> <li>• <u>Policy 10.2.5.10:</u> Height benchmark has been established</li> <li>• <u>Policy 10.2.5.9:</u> Limitation of mid-rise heights to max 8 storeys</li> <li>• <u>Policy 10.2.6.3:</u> requirement of 1-to-1 non-residential floor space replacement for MU redevelopment</li> </ul>	1. This policy is not onerous as it only promotes site clean-up when necessary. The policy is an existing policy (MOP 6.7.4). 2. The policies are in keeping with the City’s in-force and effect Rental Housing Protection By-Law 0121-2018, which is implemented under Section 99 of the Municipal Act. Council-endorsed guidelines define ‘similar rents’ as the last rent paid by the tenant with an increase no higher than the annual Provincial Guideline and a one-time capital allowance of 3%. 3. Policies 10.2.5.9 and 10.2.5.10 describe the new height-based land use designation and set requirements for height and proportions. 10.2.5.8 has been modified to remove ROW height requirement. Policy 10.2.6.3 is necessary as it only applies to neighbourhoods where mixed use lands is very scarce and retail is necessary to support complete communities.
45	TRCA (letter #49/50.1, dated March 28, 2024)	<u>1:</u> 4.3.1.9 <u>2:</u> 4.3.8 <u>3:</u> 5.3.2.5 <u>4:</u> 10.2.2.2 <u>5:</u> 10.2.2.3 <u>6:</u> 10.2.3 <u>7:</u> 10.2.3.8 <u>8:</u> Ch. 10 <u>9:</u> Ch. 11 <u>10-11:</u> 14.9.2.7	Policy Modifications & Addition	1. <u>Policy 4.3.1.9:</u> Consider removing the term “trails” from Policy 4.3.1.9 – trails in any form are not necessarily a form of passive recreation, especially if proposed within wetland. 2. <u>Policy 4.3.8:</u> Consider revising policy so buffer widths to non-provincially signification wetlands are not just limited to 10m – a buffer width of >10m may be warranted where possible. 3. <u>Policy 5.3.2.5:</u> Request to add policy that states new housing development and intensification through various housing forms (including ARUs) be located/planned outside of natural hazards. Policy 5.3.2.5 permits ARUs in a principal residence, but if it is within hazardous lands, then there is no language within the OP to address this increase in risk to people and property. 4. <u>Policy 10.2.2.2:</u> Add that utility uses should also avoid natural hazards/natural hazard lands and other wetlands, unless deemed satisfactory by the City & conservation authority. 5. <u>Policy 10.2.2.3:</u> Add natural hazards/natural hazard lands to areas where public works should not traverse, coincide or affect, in addition to the NHS, to align with definition of Environmental Impact Study in Glossary. Also, continue to make reference for review by “the appropriate conservation authority” to ensure continued management of sensitive lands.	1. Policy (now 4.3.1.9) is to remain as is, as the City will determine if trails can be permitted with minimal impact to wetlands. 2. Policy revised. 3. Not necessary as 4.3.4 address development on hazard lands including historic development. 4. Added to Chapter 10. 5. Added “natural hazard, natural hazard lands or other wetlands” to policies in Chapter 10. 6. ARUs are subject to the Zoning By-law and therefore must comply to their direction, including by-law 4.1.5.6 and others that reference minimum setbacks to Greenland zones. 7. Added reference to “and/or sites” after “hazard lands”. Also included “wetlands and shorelines” to end of policy. 8. Development of ARUs are still subject to the Zoning By-law that contains language regarding development within Greenland zones. 9. Policy 4.3.1.19 identifies the restrictions on development & site alteration within Greenlands or lands adjacent to Significant Natural Areas. 10. Policy has been updated. 11. Noted.

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				<p>6. <u>Section 10.2.3</u>: Add policy that speaks to appropriate setbacks/buffers from features &amp; natural hazards.</p> <p>7. <u>Policy 10.2.3.8</u>: Revise policy to include erosion hazards and slope instability or use term hazardous lands/sites to capture both flood and erosion hazards. Also, in addition to hazard lands associated with a valley and watercourse corridor, include wetlands and shorelines.</p> <p>8. <u>Various policies in Chapter 10</u>: for policies relating to ARUs, add policy/language to prohibit development from locating within hazardous lands/sites, especially if units are already in flood/erosion prone areas.</p> <p>9. <u>Chapter 11</u>: Clarify by adding policy that states notwithstanding policy 11.2.6, PPS direction is that development and site alteration are not permitted within hazardous lands/sites. Include reference to conservation authority to ensure City-initiated flood studies, mitigation, and remediation requirements are to the satisfaction of the City and conservation authority.</p> <p>10. <u>Policy 14.9.2.7</u>: Change wording to “approval pursuant to section 28 of the Conservation Authorities Act.”</p> <p>11. <u>Policy 14.9.2.7</u>: The policy applies to Two Zone Concept area – if the City wants to update section, TRCA would like to participate in process.</p>	
46	MHBC on behalf of TCPL (letter #50, dated May 14, 2024)	<p><u>1</u>: 17.19.7 &amp; 17.19.8</p> <p><u>2</u>: New Policy: 17.19.10</p>	Policy Revision	<p>1. Policy 17.19.7 &amp; 17.19.8: Policies do not reflect development and regulatory requirements of TCPL. TCPL is regulated federally by the Canada Energy Regulator, not by the Technical Standards and Safety Authority. Vehicle parking is also not permitted within TCPL right-of-way.</p> <p>2. <u>New Policy 17.19.10</u>: TransCanada Pipelines Limited (TCPL):  <i>“1. TransCanada Pipelines Limited (“TCPL”) operates high pressure natural gas pipelines within its rights-of-way which cross through the City of Mississauga as identified on Schedule 1 to this Plan.</i>  <i>2. TCPL is regulated by the Canada Energy Regulator (“CER”), which has a number of requirements regulating development in proximity to the pipelines, including approval for activities within 30 metres of the pipeline centreline.</i>  <i>3. New development can result in increasing the population density in the area, and may result in TCPL being required to replace its pipeline to comply with CSA Code Z662. Therefore, the City shall require early consultation with TCPL for any development proposals within 200 metres of its facilities.</i>  <i>4. A setback of 7 metres shall be maintained from the limits of the right-of-way for all permanent buildings and structures. Accessory structures shall have a minimum setback of at least 3 metres from the limit of the right-of-way.</i>  <i>5. A minimum setback of 7 metres shall be maintained from the limits of the right-of-way for any parking area or loading area, including parking, loading, stacking and bicycle parking spaces, and any associated aisle or driveway.</i>  <i>6. In the Urban System, the City will encourage the use of TCPL’s right-of-way for passive parkland or open space subject to TCPL’s easement rights.”</i></p>	<p>1. Policies have been updated.</p> <p>2. New policies have been added under Section 18.19.</p>
47	GSAI on behalf of KJC Properties Inc. (805 Dundas St. E.) (letter #51, dated June 28, 2024)	<p><u>1</u>: 5.2.2</p> <p><u>2</u>: 5.2.4</p> <p><u>3</u>: 5.2.5 and Table 5.1</p> <p><u>4</u>: 8.4.1.17</p> <p><u>5</u>: 8.4.5.2</p> <p><u>6</u>: 8.6.2.5</p> <p><u>7</u>: Chapter 11</p>	Policy Revision	<p>1. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without specifying what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>2. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a reduced percentage of larger, family-sized units based on market trends.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5-1: Affordable Housing</u>: Questioning applicability of percentages on a smaller scale (City). Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing.</p>	<p>1. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>2. The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Reworded to the following: <i>“The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets.”</i></p> <p>4. 8.4.1.17 uses the term “relate” between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p>

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				<p>4. <u>Policy 8.4.1.17</u>: Requirement for built form to have a relationship to the public ROW width is inappropriate and applies a one-size-fits-all approach regardless of the location and context. Policy should be revised to eliminate universal application.</p> <p>5. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and the as-built conditions of encumbered lands being provided as POPS. Policy should be modified to encourage compliance with City Standards.</p> <p>6. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>7. <u>Chapter 11</u>: Policy framework appears to be informed by the City previous OPA 142, 143, 144. These OPAs were modified and approved by Peel Regional Council and are in-force.</p>	<p>5. Policy Deleted.</p> <p>6. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>7. The MTSA MOPAs were approved by the Region of Peel in April 2024 and are under appeal to OLT. OLT in its decision will need to determine if any of the policies in the MOPAs can be appealed as per the planning Act. The MTSA policies have been integrated into the plan and allow for the consideration of additional building heights. Changes to heights will be subject to policies in Chapter 11 and requirements in the Planning Act.</p>
48	GSAI on behalf of Star Seeker Inc., 619 Lakeshore Inc., 1022 Caven Inc. and 1028 Caven Inc. (579 Lakeshore Rd E.) (letter #53, dated June 28, 2024)	<p><u>1</u>: Chapter 3</p> <p><u>2</u>: 5.2.2</p> <p><u>3</u>: 5.2.4</p> <p><u>4</u>: 5.2.5 and Table 5.1</p> <p><u>5</u>: 8.4.1.17</p> <p><u>6</u>: 8.4.5.2</p> <p><u>7</u>: 8.6.2.5</p> <p><u>8</u>: 8.6.1</p> <p><u>9</u>: 10.2.6.2 and 10.2.6.3</p> <p><u>10</u>: 14.1.1.6</p>	Policy Revision	<p>1. City Structure, Schedule 1, identifies the sites as within a Neighbourhood. Concerned that this may challenge the delivery of refined, optimized, redevelopment forms in appropriate locations.</p> <p>2. <u>Policy 5.2.2</u>: Unclear – reads as obligation on development proponents to provide a range of housing types for each development, without specifying what is meant by housing type. Policy should be revised to encourage phased developments to provide a range and mixture of housing units, removing reference to housing type.</p> <p>3. <u>Policy 5.2.4</u>: Concerned with policy – should be re-phrased to encourage a range of housing units to be provided to meet the changing needs of residents.</p> <p>4. <u>Policy 5.2.5 &amp; Table 5-1: Affordable Housing</u>: Questioning applicability of percentages. Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing. Subject lands are not located within an IZA so the requirement to provide affordable housing units does not apply.</p> <p>5. <u>Policy 8.4.1.17</u>: Requirement for built form to have a relationship to the public ROW width is inappropriate and applies a one-size-fits-all approach regardless of the location and context. Policy should be revised to eliminate universal application.</p> <p>6. <u>Policy 8.4.5.2</u>: Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site's locational attributes and the as-built conditions of encumbered lands being provided as POPS. Policy should be modified to encourage compliance with City Standards.</p> <p>7. <u>Policy 8.6.2.5</u>: Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should be removed.</p> <p>8. <u>Policy 8.6.1</u>: Mid-rise and high-rise building characterizations are problematic as they do not adequately capture the reality of development forms and do not provide flexibility to accommodate high-rise or tall buildings at appropriate locations. The characterization of high-rise buildings does not capture the existing permissions on the subject lands in the Lakeview LAP and MOPA 131, which permit high-rise buildings up to 14 storeys.</p> <p>9. <u>Policy 10.2.6.2 and 10.2.6.3</u>: Concerned that the subject lands are proposed to retain 'Mixed Use' designation at western quadrant and redesignate eastern quadrant to 'Residential Low-Rise II'. These policies require revision and are unnecessarily restrictive.</p> <p>10. <u>Chapter 14 – Section 14.1.1.6</u>: Replacement of non-residential floor space is overly restrictive. Opposition to the maximum building height of 8 storeys. Intensification</p>	<p>1. The city structure does not preclude the submission of an application that would allow for the delivery of refined, optimized, redevelopment forms in appropriate locations.</p> <p>2. Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</p> <p>3. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>4. Reworded to the following: <i>"The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</i></p> <p>5. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>6. Policy deleted.</p> <p>7. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>8. The policy provides definitions for what constitutes low, mid and high-rise buildings in Mississauga.</p> <p>9. Changes to the designation do not add any additional restrictions as policies remain the same as in in-force MOP.</p> <p>10. Noted, but it is important that development is consistent with the policies of the plan.</p>

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				<p>policies within Neighbourhoods are contrary to the policy objectives of the entire OP as some lands within Neighbourhoods are appropriate for redevelopment.</p>	
49	<p>Sajecki Planning Inc. on behalf of BGO (formerly Bentall GreenOak) (letter #55, dated June 28, 2024)</p>	<p><u>1</u>: 3.3.5.2 <u>2</u>: Existing: 13.1.1.3, 14.1.1.3, 16.1.1.2, 19.5 <u>3</u>: 14.1.2.2 <u>4</u>: 10.2.6.3 <u>5</u>: 5.2.1</p>	Policy Revision	<ol style="list-style-type: none"> <li><u>Policy 3.3.5.2</u>: Relax language of policy to reflect opportunities for site-specific conditions to inform development potential (beyond what is outlined in the OP).</li> <li><u>Existing Policies: 13.1.1.3, 14.1.1.3, 16.1.1.2 and 19.5</u> Should not be removed as it forces applicants to pursue OPAs when only ZBLA required. Removes guidance for staff in review of amendment applications. Reintroduce policies similar to 16.1.1.2.</li> <li><u>Policy 14.1.2.2</u>: Consider additional height permissions greater than 8 storeys or criteria where additional height may be considered. Remove the 1.75 FSI max or outline criteria where additional density may be considered. Replace 'maintain the same amount of commercial floor space' with 'maintain the neighbourhood function of the site'. Remove reference to a specific block perimeter requirement.</li> <li><u>Policy 10.2.6.3</u>: Remove this policy or permit a reduced pr permit a reduced replacement percentage where supported by a market study. Suggest 40-50% replacement ratio.</li> <li><u>Policy 5.2.1</u>: New housing assessment report requirement for development applications of 50 or more new units. Suggest incorporating any reporting requirements into the terms of reference for PJR or as part of a project data sheet.</li> </ol>	<ol style="list-style-type: none"> <li>This policy is aimed to maintain the integrity of the City Structure while also recognizing that context sensitivity does play a role. Modifications or amendments to the plan through the development application process are expected; however, the scale and nature of the site-specific amendments need to be considered on a cumulative basis.</li> <li>Policy guidance is provided for developments that require OPAs to consider housing options, built form, and compatible uses throughout the plan and in accordance with the Planning Act.</li> <li>Policy 14.1.2.2.a commercial uses within neighbourhoods are crucial for the completeness of these communities. In many areas within the City more retail is needed within walking distance to residences to increase walkability and reduce car dependency. Policy 14.1.2.2.c This policy establishes an overall framework for all sites across the city, which is why it needs to be general and high-level. If additional granular and site-specific details are needed, these will be determined through the application review process. This policy represents a doubling of maximum permitted heights from the previous Official Plan and additional policies were added to incentivize retail above the ground floor by increasing heights above 8 storeys.</li> <li>Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</li> <li>The Housing Assessment Report has been integrated into the Planning Justification Report terms of reference.</li> </ol>
50	<p>Sajecki Planning Inc. on behalf of Edenshaw Developments Ltd. (letter #56 dated June 28, 2024)</p>	<p><u>1</u>: 3.3.5.2 <u>2</u>: 4.3.4.21 <u>3</u>: 5.2.2 <u>4</u>: 5.2.4 <u>5</u>: 5.2.5 and table 5.1 <u>6</u>: 5.2.1 <u>7</u>: 5.3.3 <u>8</u>: 5.2.3.5 <u>9</u>: 6.2.9 <u>10</u>: 7.3.4.8 <u>11</u>: 8.3.12, 8.6.1.3 <u>12</u>: Angular Planes <u>13</u>: 8.4.5.2 <u>14</u>: 8.6.1 <u>15</u>: 10.2.5.10 <u>16</u>: 10.2.6.3 <u>17</u>: 12.1.3.5 <u>18</u>: 12.2.8.26 and 12.2.8.27 <u>19</u>: 12.4..4.1 and 12.4.4.2 <u>20</u>: 13.3.2.1 <u>21</u>: Existing OP 13.1.1.3 and 14.1.1.3 <u>22</u>: 13.1.2.4 <u>23</u>: 13.1.2.6</p>	Policy Revision	<ol style="list-style-type: none"> <li><u>Policy 3.3.5.2</u>: Policy ignores the role of context-specific development in achieving city-building objectives. Recommend additional language for site-specific exceptions where local context (lot size, dimensions, orientation, adjacency, etc.) support height or densities beyond those established by OP.</li> <li><u>Policy 4.3.4.21</u>: Policy is unclear and requires POPS to front onto a public street at street level. Requiring street frontage unnecessarily restricts the location of POPS on constrained sites resulting in potential inefficient site layout or lost opportunities to provide high-quality publicly available park space. Recommend soften language to encourage public street frontage rather than require or clarify the intent of the policy.</li> <li><u>Policy 5.2.2</u>: "Phased development will have a range and mix of housing types for each development phase." – replace 'will' with 'should'.</li> <li><u>Policy 5.2.4</u>: Recommend reducing the percentage of 2 and 3-bedroom units or add flexibility to the policy to allow other ways to achieve the unit mix target.</li> <li><u>Policy 5.2.5 and Table 5.1</u>: Housing targets are better suited in a Housing Strategy rather than local policy. Remove housing targets from OP.</li> <li><u>Policy 5.2.1</u>: New housing assessment report requirement – reporting requirement should be included within ToR for PJRs. Clarify the policy to outline what conditions a housing needs assessment report will be required for developments less than 50 units.</li> <li><u>Policy 5.3.3</u>: "Affordable housing should be included on redevelopment sites as a matter of good planning and to address the needs of diverse households." Suggest replacing 'should be included' with 'is encourage to be included' and add 'where feasible' after 'on redevelopment sites'.</li> <li><u>Policy 5.2.3.5</u>: Draft policy re: alternative development and design standards for affordable housing was included in bundle 3 and was removed. Reintroduce this draft policy.</li> <li><u>Policy 6.2.9</u>: Allows the City to identify and conserve 'intangible cultural heritage' – add definition for 'intangible cultural heritage'.</li> <li><u>Policy 7.3.4.8</u>: Revise policy to clarify the intent of the term 'road system'.</li> <li><u>Policy 8.3.12 and 8.6.1.3</u>: The use of appropriate height transitions and separation distances will be achieved by 'stepping back building massing' and provided through</li> </ol>	<ol style="list-style-type: none"> <li>This policy is aimed to maintain the integrity of the City Structure while also recognizing that context sensitivity does play a role. Modifications or amendments to the plan through the development application process are expected; however, the scale and nature of the site-specific amendments need to be considered on a cumulative basis.</li> <li>Upon reviewing policy 4.3.4.21, it has been deleted.</li> <li>Upon reviewing policy 5.2.2, it has been deleted. Language does not add to the intent of the policy.</li> <li>The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</li> <li>Reworded to the following: "The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</li> <li>The Housing Assessment Report has been integrated into the Planning Justification Report terms of reference.</li> <li>This policy is in accordance with the mandate of Council to provide affordable housing options to the residents.</li> <li>Policy 5.3.3.4 allows for flexibility for design solutions that support housing affordability.</li> <li>Section 6.1 outlines that intangible cultural heritage are like traditions customs, stories and events. additional definitions can be found in provincial guidance.</li> <li>Section 7.3.4 generally prescribes the City's road classification system containing 14 street classes organized by four functional classes.</li> <li>Upon reviewing the policies under 8.3.1.2, we are recommending removal of bullet a., b. and the term "overlook" in d. Language does not meet the intent of the policy. Policy 8.6.1.3 provides general guidance for mid-rise developments and was revised to consider the appropriate street proportion.</li> <li>Policy updated and made more general in language to provide more flexibility in built form.</li> <li>Policy deleted.</li> <li>The policy has been revised.</li> </ol>

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		<p><u>24:</u> 16.1.1.2  <u>25:</u> 14.1.1.2  <u>26:</u> 14.1.3.3</p>		<p>'facing distances, building heights, angular planes, and step-backs'. Suggest that if specific design elements must be mentioned, ensure policies say can include, but are not limited to".</p> <p>12. <u>Angular Planes</u> – Have unintended consequence of reducing housing affordability and supply, City should consider moving away from encouraging angular planes as a means of achieving design objectives and remove all references to angular planes.</p> <p>13. <u>Policy 8.4.5.2</u> – Requires POPS to be designed in accordance with the City's standards for public open space but do not reflect the often encumbered nature of POPS making this requirement difficult to achieve. Suggest replacing 'will' with 'should'</p> <p>14. <u>Policy 8.6.1</u>: Proposed definition of mid-rise building limits the height of buildings to the width of the ROW. Recommend adding language to reflect opportunities for site-specific exceptions where local context supports heights greater than the width of right-of-way.</p> <p>15. <u>Policy 10.2.5.10</u>: Limits the height of buildings in Residential High-Rise areas to 8 storeys or where no CA or SS policies exist, the height of the tallest existing building. Recommend removing policy.</p> <p>16. <u>Policy 10.2.6.3</u>: Requires redevelopment of Mixed Use sites to maintain the same amount of non-residential floor space. Recommend taking a similar approach to replacement policies in the draft OP focusing on the planned function of Mixed Use sites rather than 100% replacement of existing non-residential floor space.</p> <p>17. <u>Policy 12.1.3.5</u>: Prohibits the redevelopment of existing office buildings that would result in the loss of office floor space. Recommend undertaking an office needs study to inform any office/no-residential replacement policies.</p> <p>18. <u>Policy 12.2.8.26 and 12.2.8.27</u>: Requires tall buildings w/in the Downtown Core to be designed in the form of a podium, tower and top form with specific requirements for podium height massing. This can result in a monotonous streetscapes with limited architectural variation. Recommend removing policy and instead outlining design objectives buildings are to consider in their design.</p> <p>19. <u>Policy 12.4.4.1 and 12.4.4.2</u>: Require Residential High-Rise and Mixed Use development along Hurontario Street to provide non-residential uses at-grade. Recommend replacing 'will' with 'should'.</p> <p>20. <u>Policy 13.3.2.1</u>: Maximum building height of four stories within Community Nodes, reconsider maximum height permissions in Community Nodes in excess of 8 storeys.</p> <p>21. <u>Existing policies 13.1.1.3 and 14.1.1.3</u>: For heights greater than established in MN or CN policies may be considered where certain criteria is met. This policy is proposed to be removed from NEW OP – consider reintroducing a policy similar to these.</p> <p>22. <u>Policy 13.1.2.4</u>: Requires tall buildings to incorporate podiums to mitigate wind impacts and maximum sunlight on the public realm. Recommend considering replacing "will be required to" with 'may'.</p> <p>23. <u>Policy 13.1.2.6</u>: Requires existing surface parking areas to be replaced with underground or integrated above-grade structure parking as part of redevelopment. Consider replacing "will" with "should".</p> <p>24. <u>Policy 16.1.1.2</u>: Proposals for heights greater than 4 storeys may be considered where certain criteria is met. Consider reintroducing a similar policy to new OP.</p> <p>25. <u>Policy 14.1.2.2</u>: Reconsider max height permissions on Mixed Use sites within Neighbourhood character areas in excess of 8 storeys, remove reference to specific block sizes, focus on planned function of Mixed Use sites rather than 100% replacement of existing commercial floor space.</p> <p>26. <u>Policy 14.1.3.3</u>: Limit building heights to existing buildings on the same property. Remove policy.</p>	<p>15. The policy establishes a height range that fits each context. Height actually exceeds 8 storeys. High rise designated areas are residential areas generally found within Neighbourhoods with existing multi-unit buildings. Many have height limits that fit the existing building on site. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</p> <p>16. Lands designated Mixed Use are intended to offer much-needed supportive services and jobs in order to sustain complete communities. Changes have been introduced to use a formula and percentages relative to the area size.</p> <p>17. Policy only applies to lands designated Office. Office use are to be directed to MTSA's as per provincial directions.</p> <p>18. As outlined in this section, tall buildings characterize a good part of the Downtown Core. Defining the form of tall buildings and how they should be designed is to ensure that they enhance the pedestrian environment, provide access to natural light, sky views and privacy for residents, etc.</p> <p>19. The purpose of providing non-residential uses at-grade along Hurontario Street is to activate the street as it is along the LRT route and to create an attractive and walkable environment along Hurontario Street with a vibrant mix of shops, restaurants, cafes and service establishments (policy 12.4.2.2).</p> <p>20. Each Growth Node now contains policies in relation to height depending on the context and vision for the node.</p> <p>21. Nodes as SGAs are expected to provide for highest employment densities to enable the City to meet its employment targets and create complete communities. Policy has been updated to provide for more flexibility.</p> <p>22. The policies to mitigate wind impacts and to allow maximum sunlight on the public realm are good design principles that are necessary to protect existing and future residents.</p> <p>23. Each proposal for redevelopment will be considered on a site-specific basis and the appropriate parking requirements.</p> <p>24. Policy guidance is provided for developments that require OPAs to consider housing options, built form, and compatible uses as outlined in S.14.1.1.4.</p> <p>25. Policy 14.1.2.c was amended to allow for increased building height greater than 8 storeys subject to criteria and to provide for more flexibility.</p> <p>26. The intent of this policy is to ensure old and new buildings fit together and maintain a good scale for the community.</p>



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51	Sajecki Planning Inc. on behalf of Stafford Homes (letter #57 dated June 28, 2024)	<u>1</u> : Chapter 10, 10.2.6.3, 10.2.6.4 <u>2</u> : Existing OP 13.1.1.3, 14.1.1.3 and 16.1.1.2 <u>3</u> : 14.1.2.2		<ol style="list-style-type: none"> <li>Concerns with the redevelopment restrictions of Mixed Use sites which limits development of sites over 1ha to 8-storeys. <u>Policy 10.2.6.3 and 10.2.6.4</u> restrict MU redevelopment to maintain the same amount of non-residential floor space while prohibiting units on the ground floor.</li> <li><u>Existing policies (13.1.1.3, 14.1.1.3, 16.1.1.2)</u> allow for intensification in designations including Major Nodes, Community Nodes and Neighbourhoods. Similar policies should be reintroduced into the new OP.</li> <li><u>Policy 14.1.2.2</u>: Concerns with several policies contained in 14.1.2.2 are overly prescriptive: (a) limits the development potential of neighbourhood malls and other mixed use areas – recommend revision to replace a percentage of commercial space to be determined by a market study; (b) a cap of 8 storeys underestimates the potential of mixed use sites and the density cap of 1.75 FSI is overly prescriptive. (e) other urban design measures may be more successful to achieve this goal. (i) limiting block perimeters to a certain metric overly prescriptive and recommend removal of this policy.</li> </ol>	<ol style="list-style-type: none"> <li>Lands designated Mixed Use are intended to offer much-needed supportive services and jobs in order to sustain complete communities. Changes have been introduced to use a formula and percentages relative to the area size.</li> <li>Policy guidance is provided for developments that require OPAs to consider housing options, built form, and compatible uses as outlined in S.14.1.1.4.</li> <li>Policy 14.1.2.2.a commercial uses within neighbourhoods are crucial into the completeness of these communities. In many areas within the City more, and not, less retail is needed within walking distance to residences to increase walkability and reduce car dependency. Policy 14.1.2.2.c This policy establishes an overall framework for all sites across the city, which is why it needs to be general and high-level. If additional granular and site-specific details are needed, these will be determined through the application review process.</li> </ol>
52	Sajecki Planning Inc. on behalf of Starlight Developments – Multiple Sites: 2185 Sheridan Park Dr; 1970-1980 Fowler Dr; 5 Woodlawn Ave, 8 Oakwood Ave, 206-212 Lakeshore Rd E.; 2200 Roche Ct; 2233-2235 Hurontario St. (letter #58 dated June 28, 2024)	<u>1</u> : 5.2.1 <u>2</u> : 5.2.4 <u>3</u> : 8.3.12, 8.6.2.2 <u>4</u> : 8.6.2.5, 8.6.2.7 <u>5</u> : 8.4.5.2 <u>6</u> : 8.6.1(b) <u>7</u> : Multiple policies in 8.6.1 <u>8</u> : 12.3.2.1 <u>9</u> : 14.1.3.3 <u>10</u> : 16.120.2	Policy Revision	<ol style="list-style-type: none"> <li><u>Policy 5.2.1</u>: requirement for housing assessment should be included in the TOR for PJR</li> <li><u>Policy 5.2.4</u>: Reduce the percentage of 2-3 bedroom units or add flexibility to the policy to reflect other ways to achieve the unit mix target. A target of 15% for 2 bedroom units is suggested.</li> <li><u>Policy 8.3.12, 8.6.2.2</u>: Policies may not be achievable as they provide too many constraints to development and are better suited within urban design guidelines.</li> <li><u>Policies 8.6.2.5, 8.6.2.7</u>: all references to specific transition tools (including separation distances and angular planes) should be removed from policy or else presented as several of many tools.</li> <li><u>Policy 8.4.5.2</u>: remove this policy</li> <li><u>Policy 8.6.1 (b)</u>: add language clarifying that mid-rise building heights greater than the width of the ROW may be appropriate in certain conditions (for example, sites of a certain size, depth, or location)</li> <li><u>Policies 8.6.1.3, 8.6.1.4, 8.6.1.9, 8.6.1.13, 8.6.1.17, 8.6.1.18, 8.6.1.19, 8.6.1.20, 8.6.1.22, 8.6.1.23, 8.6.1.24, 8.6.4.1</u>: Revert language back to “should” for these policies as they are too prescription and don’t acknowledge site-specific variables.</li> <li><u>Policy 12.3.2.1</u>: remove 45 degree angular plane requirement. Remove 30m separation distance or reduce the required distance.</li> <li><u>Policy 14.1.3.3</u>: Remove this policy.</li> <li><u>Policy 16.120.2</u>: Remove this policy as it is too restrictive.</li> </ol>	<ol style="list-style-type: none"> <li>The Housing Assessment Report has been integrated into the Planning Justification Report terms of reference.</li> <li>The policy is already an “encouragement” policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</li> <li>Policy 8.3.12 refined to remove lotting patterns and continuity of setbacks criteria for new developments.</li> <li>Policy updated and made more general in language to provide more flexibility in built form.</li> <li>Policy deleted.</li> <li>Policy provides a definition of mid-rise buildings as a typology independent of location. The policy was revised to consider the street right-of-way.</li> <li>Policy 8.6.1.3 provides general guidance for mid-rise developments and was revised to consider the appropriate street proportion.</li> <li>Policy updated and made more general in language to provide more flexibility in built form.</li> <li>The intent of this policy is to ensure old and new buildings fit together and maintain a good scale for the community.</li> <li>Policy is in keeping with the general direction of the OP and the PPS 2024 to ensure lands located close to transit develop in a transit-supportive manner.</li> </ol>
53	GWD on behalf of 1212763 Ontario Ltd./1212765 Ontario Ltd. (The Azuria Group Inc.) re: 3150 and 3170 Golden Orchard Dr. (letter #59 dated June 28, 2024)	<u>1</u> : 8.6.4.1 <u>2</u> : 11.5.1 <u>3</u> : 11.7.1 & 11.7.2	Policy Revision	<ol style="list-style-type: none"> <li><u>Policy 8.6.4.1</u>: is overly restrictive. Underground parking is encouraged but should not be regulated as being mandatory.</li> <li><u>Policy 11.5.1 and Table 11-1</u>: must be update to correctly reference Schedules 8a to 8r. Recommend similar height policies as MOPA 144 – 5.7.4 Heights be included.</li> <li><u>Policy 11.7.1, 11.7.2</u> – overly restrictive and need to be updated to permit flexibility.</li> </ol>	<ol style="list-style-type: none"> <li>Parking requirements are mandated according to bylaw. If required, parking is to be located underground or to the rear.</li> <li>Updated.</li> <li>These are necessary to support the quality of life within future transit communities.</li> </ol>
54	Bousfields Inc. on behalf of Rangeview Landowners Group Inc. re: Rangeview Lands (letter #60 dated June 13, 2024)	<u>1</u> : Policy 13.3.4 – Table 1	Policy Revision	<ol style="list-style-type: none"> <li>Update Schedule 8q Land Use so the Rangeview lands are correctly identified as “Residential High Density”</li> <li><u>Policy 13.3.4 Table 1</u>: be revised to be consistent with the Total Residential and Unit Count and distribution of Built Form provided in Table 1 of Appendix A.</li> </ol>	<ol style="list-style-type: none"> <li>Updated.</li> <li>Table will be updated in accordance with Council direction once the approval process is completed.</li> </ol>

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55	GSAI on behalf of CRW 1 LP and CRW 2 LP re: 2077-2105 Royal Windsor Dr. (letter #62 dated June 28, 2024)	<u>1</u> : 11.3.2		1. <u>Policy 11.3.2</u> is too rigid and will negatively influence mixed-use development, especially in MTSA. Replacement of non-residential floor area is better evaluated through an understanding of market conditions/demand.	1. These policies are part of the PMTSA framework where development is to accommodate future growth through a diverse mix of land uses. Maintaining non-residential employment uses is necessary in meeting the density target of people and jobs. Changes to the policies have been introduced to provide more flexibility.
56	GSAI on behalf of 2226 Royal Windsor GP Inc./South Shore Asset Management Group re: various properties (letter #63 dated June 28, 2024)		General Comment	1. General concerns with lands in proximity to the Clarkson GO Station and lands located beyond the limit of the MTSA as they not being considered for redevelopment or redesignation. Concerns with the long-term impacts of restrictive land use policies in an area where there is potential for growth.	1. These lands will be evaluated through the Clarkson GO MTSA study.
57	Urban Strategies Inc. on behalf of Oxford Properties re: Square One Mall and surrounding lands in Downtown Core (letter #64 dated July 4, 2024)	<u>1</u> : 7.3.4.6 <u>2</u> : 8.2.13 <u>3</u> : 8.6.2.5 <u>4</u> : 8.6.3.14 <u>5</u> : 12.1.1.6 <u>6</u> : 12.2.3.4 <u>7</u> : 12.2.3.7 <u>8</u> : 12.2.4.4 <u>9</u> : 12.2.5.3 and Map 12-2.3 <u>10</u> : 12.2.6.2 <u>11</u> : 12.2.9.8	Policy Revision	<ol style="list-style-type: none"> <li><u>Policy 7.3.4.6</u>: request policy be revised to reflect the possibility of private ownership with an easement for public access.</li> <li><u>Policy 8.2.13</u>: what is meant by “net ecological benefit” or what is required of an applicant. New ecological benefit may not be the best approach for compact urban sites. Remove policy.</li> <li><u>Policy 8.6.2.5</u>: Transition policies should not be applicable to Downtown Core. Revise policy to clarify that it is not applicable to developments in the Downtown Core.</li> <li><u>Policy 8.6.3.14</u>: Policy be revised to provide direction to preserve mature trees where possible.</li> <li><u>Policy 12.1.1.6</u>: Individual applications should not have to demonstrate how development contributes to this broader objective. The policies should include stronger recognition of the contribution that retail and commercial uses make to providing jobs in the Downtown Core.</li> <li><u>Policy 12.2.3.4</u>: Policy is inconsistent with the land use framework for the area and request that the draft description of the Rathburn District be revised to not describe the area as an employment area and to limit the description of parks to the designated Public Open Space</li> <li><u>Policy 12.2.3.7</u>: the reference to a series of parks is inconsistent with the in-force Land Use schedule of the OP and the long-standing planning arrangements for the SQ1 lands relating to parking. Request the section be revised to refer simply to open spaces.</li> <li><u>Policy 12.2.4.4</u>: Not clear what “strongly encouraged” means as it relates to specific development applications. We recommend this policy be removed.</li> <li><u>Policy 12.2.5.3 and Map 12-2.3</u>: Request Map 12-2.3 be revised to remove the Future Public Parks symbols from Oxford-owned properties.</li> <li><u>Policy 12.2.6.2</u>: Request policy be revised to require applicants to “assess” rather than “address” the adequacy of public service facilities and to clarify that any arrangements related to school facilities would be required prior to rezoning or Draft Plan of Subdivision approval.</li> <li><u>Policy 12.2.9.8</u>: The revised permitted uses for this designation no longer include: commercial parking facility, financial institution, major office, makerspaces, overnight accommodation, personal service establishment, post-secondary educational facility, restaurant, retail store, and secondary office. The removal of these uses for the Downtown Core Mixed Use designation is incompatible with the existing function, in force planning framework, and planning function of these area. Request that policy be revised to clarify that all permitted uses listed in the in-force OP Section 11.1.4.2 of the Downtown Core Local Area Plan are permitted in the Downtown Core Mixed Use designation.</li> </ol>	<ol style="list-style-type: none"> <li>These matters are best considered on a site-specific basis depending on the need and circumstances, either through local planning or during the development approval process.</li> <li>Net Ecological Benefit are anticipated benefits to resources from restoration tactics.</li> <li>Policy updated to reference appropriate change in height and massing with suggested methods. Policies found in the Downtown Core chapter will supersede and further refine general policies.</li> <li>Policy 8.6.3.14.d. policy is in line with the City’s tree preservation Bylaws.</li> <li>The policy uses “may” to provide or an opportunity to identify ways in which development could contribute to the broader objectives through a early discussions.</li> <li>The Rathburn District preamble has recently been updated by the council-approved OPA 177.</li> <li>The wording is a preamble where it generally describes the vision for the SQ1 lands. Further, the wording is general enough that future development on these lands will further identify where the parks and open space connections will be located.</li> <li>The incorporation of office uses as part of residential development to make a true mixed-use development is strongly encouraged as a major objective in continuing to promote a vibrant downtown core.</li> <li>Map 12-2.3 is only conceptual. More discussions will take place prior to determining final locations of future parks.</li> <li>Policy is necessary to ensure adequate public services are planned for.</li> <li>These land uses were removed because there was a duplication of permitted uses from the Mixed Use designation’s permitted uses list.</li> </ol>

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58	Greater Toronto Airports Authority (GTAA) (letter #65 dated July 11, 2024)	<u>1:</u> 4.13 <u>2:</u> 4.13.7 <u>3:</u> NEW PPS 3.4.2 <u>4:</u> 4.13.8 <u>5:</u> 4.13.9 <u>6:</u> 4.13.11		<ol style="list-style-type: none"> <li><u>Policy 4.13</u> – Aircraft Noise: Master Plan reserves for a 6<sup>th</sup> runway by 2032 to accommodate growth. The 6<sup>th</sup> runway configuration will require an update to the current Transport Canada Noise Contours, likely to impact areas not currently covered by the existing contours. The definition used for lands within the Airport Operating Area (AOA) should be broadened to describe overall employment area. The employment uses within the AOA provide a natural buffer against sensitive land uses and form, with the employment lands in Brampton and Toronto, Canada's second largest employment zone. This economic area's unique size and diversity should be recognized in the OP.</li> <li><u>Policy 4.13.7</u> – clarification required to specify the noise contour line as 30NEF/NEP, which forms the approximate boundary of the AOA. Provided two possible definitions of the AOA for inclusion in the new OP:</li> </ol> <p><b>OPTION 1:</b> For ease of implementation of the provincial and municipal land use policies for noise-sensitive land uses, the City of Mississauga, in conjunction with Toronto Pearson, has defined a fixed Airport Operating Area (AOA) based on the 30 NEP/NEF Composite Noise Contour. The AOA, illustrated on Map 4-1, establishes and stabilizes the aircraft noise area for the purpose of land use planning, which benefits both the air carriers and the surrounding communities.</p> <p><b>OPTION 2:</b> For ease of implementation of the provincial and municipal land use policies for noise-sensitive land uses, the City of Mississauga, in conjunction with Toronto Pearson, has defined a fixed Airport Operating Area (AOA) based on the 30 NEPINEF Composite Noise Contour. 111e AOA perimeter approximates the location of the 30 NEPINEF line by following readily identifiable natural (waterways), transportation (roads, rail lines) and planning (property and land use designation boundaries) features. The AO A, illustrated on Map4-1, establishes and stabilizes the aircraft noise area for the purpose of land use planning, which benefits both the air carriers and the surrounding communities.</p> <ol style="list-style-type: none"> <li>Reference to the new PPS section 3.4.2 – Airports, which prohibits sensitive land uses above the 30NEF/NEP contour.</li> <li><u>Policy 4.13.8:</u> Request to include a transparent process for administering the City's requirement of notification to tenants and purchasers for proposals in the 25NEF noise category. Want to ensure tenants and purchasers clearly understand how aircraft noise can impact them.</li> <li><u>Policy 4.13.9:</u> Continue to support the intent of this section but want to ensure that buyers and tenants are provided with every opportunity to be aware of the noise conditions and potential impacts.</li> <li><u>Policy 4.13.11:</u> The term "feasibility noise impact study" can be ambiguous and propose to replace it with "detailed noise impact study". Strongly advise that a post-construction noise study/verification be undertaken to ensure residential units in noise-sensitive areas fully comply with all applicable noise guidelines. Propose the following changes:</li> </ol> <p>4.13.11 Development applications for sensitive land uses including new residential dwellings, with the exception of replacement detached and semidetached dwellings, for lands where permitted within the Airport Operating Area, mm; be processed for approval provided that all of the following are satisfied:</p> <ol style="list-style-type: none"> <li>a detailed noise impact study will be submitted as part of every development application to verify that mitigated indoor and outdoor noise levels will not exceed</li> </ol>	<ol style="list-style-type: none"> <li>Language has been added to the new OP to highlight the economic importance of the airport. Changes will be made to noise contour mapping when available.</li> <li>Section 4.13.2 was updated to include language provided.</li> <li>Already reflected in the OP (example 4.13).</li> <li>Already included in 4.13 to the extent permitted by applicable regulations.</li> <li>Noted.</li> <li>Updated.</li> <li>Update was made where possible.</li> </ol>

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				<p>the sound level limits established by the applicable Provincial Government environmental noise guidelines;</p> <p>b. appropriate conditions relating to noise mitigation that are consistent with the findings of the detailed noise impact study, are included in any final approval;</p> <p>c. c. a post-construction noise study and/or testing is undertaken to confirm, to the satisfaction of both the City of Mississauga and Toronto Pearson, that all mitigation measures and features prescribed in the detailed noise impact study have been implemented and that they satisfy the applicable Provincial Government environment noise guideline, and</p> <p>d. an Aircraft Noise Warning Agreement between the City of Mississauga, the Greater Toronto Airports Authority (or its successor) and the Developer, is required as part of any approval.</p> <p>7. <u>Policy 7.10 – Airport</u>: Suggest the inclusion of additional context around Toronto Pearson Airport’s significant role in Mississauga’s economy. Suggested the following wording:</p> <p><i>Toronto Pearson is Canada's largest airport and a major transportation facility and destination within Mississauga. It serves an important regional, national, and international role by transporting passengers and goods.</i></p> <p><i>Toronto Pearson is home to 400+ companies that employ over 50,000 people and facilitate over 6% of Ontario's GDP. The airport is at the centre of Canada's second -largest employment area and, with its neighbouring business community is a national economic catalyst that benefits the City of Mississauga.</i></p> <p>7.10.1 Mississauga will work with Toronto Pearson and other stakeholders to facilitate transit and active transportation access to and from the Airport and surrounding employment lands, with consideration of the Airport's future multi-modal transportation hub.</p> <p>7.10.2 Mississauga will support goods movement access to the Airport to promote the Airport as a key goods movement hub.</p> <p>7.10.3 Mississauga will cooperate with the Federal Government and Toronto Pearson to ensure that new construction is compatible with the requirements of the Airport, including height limitations, navigational aids, visibility and communications.</p> <p>7.10.4 Mississauga recognizes the economic importance of the airport to the surrounding employment areas and will work to ensure it can grow its economic potential to meet existing and future employment and industry needs.</p>	
59	First Gulf on behalf of 2395 Speakman Limited Partnership re: 2395 Speakman Drive (letter #66 dated August 12, 2024)	<u>1</u> : 15.17.4.1.2	Policy Revision	<p>1. <u>Policy 15.17.4.1.2</u>: It is requested that the subject land retain all permitted uses in the Business Employment designation and that the draft policy, 15.17.4.1.2 regarding accessory uses, be revised to provide more flexibility for the size of an accessory use. The draft policy currently restricts accessory commercial, daycare, and manufacturing uses to 15% of the total gross floor area within an enclosed building and restricts manufacturing to 30% when accessory to a scientific research and development facility. It is recommended that the City remove the specific maximum gross floor area policies from the Official Plan, to support accessory uses, but note that the use must be</p>	1. Policies updated to provide additional flexibility for the employment area.

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				accessory to a primary use and that the size is determined through zoning and site plan control. This would allow for Official Plan policy to support site specific zoning by-law amendments or minor variances without the requirement for amendment to the Official Plan. This would be a significant step to help simplify the development process required to redevelopment these lands and promote their marketability to potential businesses.	
60	Process Research Ortech Inc. for 2350 Sheridan Park Drive (letter #67 dated August 22, 2024)		Permissions	<ol style="list-style-type: none"> <li>1. Want land to retain all permitted uses to support business and have the option to add accessory uses like warehousing and manufacturing through a simple development process.</li> <li>2. Client wishes to be kept informed of updates and future meetings.</li> </ol>	<ol style="list-style-type: none"> <li>1. Policies updated to provide additional flexibility for the employment area.</li> <li>2. Added to distribution list.</li> </ol>
61	MHBC on behalf of Mississauga Entertainment Holdings Inc. for 30-110 Courtneypark Dr E and 40-90 Annagem Blvd (letter #68 dated March 15, 2024)	<ol style="list-style-type: none"> <li>1: 10.2.8.4, 10.2.8.4.1, 10.2.8.4.2</li> <li>2: 15.12.3, 15.12.3.1 and 15.12.3.2</li> </ol>	Policy Revision	<ol style="list-style-type: none"> <li>1. <u>Office Designation: Existing Uses</u> A policy should be added to the Office designation section that permits existing uses to continue their operations and to expand the built form as needed. Add a new section: 10.2.8.4 The following apply to uses and buildings that are legally existing as of the date of adoption of this Plan: 10.2.8.4.1 Any existing use will continue to be permitted, including the continuation of such use by new tenants/lessees, within existing buildings. 10.2.8.4.2 Any renovation, addition or expansion of existing buildings shall be permitted.</li> <li>2. <u>Section 15: Gateway Corporate Centre</u> The following policy should be added to section 15.12.2 Land Use to recognize the continuation of existing uses on the Subject Lands for the long-term: 15.12.3 Site Specific Land Use 15.12.3.1 In addition to the Office designation policies of this Plan, and the Site 24 (Gateway Corporate Centre Employment Area) policies, the following uses will be permitted, as freestanding buildings and uses, on lands designated Office and Gateway Corporate Centre Employment Area at 30-110 Courtneypark Dr E and 40-90 Annagem Blvd: a. entertainment, recreation and sports facilities; b. restaurant; c. Commercial and retail. 15.12.3.2 Notwithstanding policy 15.12.2.2, existing and new buildings at 30-110 Courtneypark Dr E and 40-90 Annagem Blvd, designated as Office, will be allowed to expand and redevelop in keeping with permitted uses.</li> </ol>	<ol style="list-style-type: none"> <li>1. Met with Gerry Tchisler (MHBC) and Jeff Lumsden (Penequity) on October 9<sup>th</sup>. Changes have been made to the Employment Area policies to address comments as well as conform with the new definition under the Planning Act, including the sheltering of existing uses under the new OP.</li> <li>2. The new provision under policy 16.2.1.1 ensures the continuation of a use that is established on or before October 20, 2024.</li> </ol>
62	Arcadis on behalf of Canadian Urban Limited ("Owner"), owners of 1475 Dundas Street East (letter #70 dated December 5, 2024)	<ol style="list-style-type: none"> <li>1: Section 13.3.5</li> </ol>	Boundary revision	<ol style="list-style-type: none"> <li>1. <u>Section 13.3.5</u> Dixie-Dundas of the draft MOP 2051 be amended to: To allow the boundary of the Dixie-Dundas Community Node to expand and include lands within the Dixie-Dundas and Applewood Special Policy Areas once appropriate flood mitigation is completed and proposed policy changes have been approved by the Province.</li> </ol>	<ol style="list-style-type: none"> <li>1. Appropriate revisions will be made, if applicable, once the flood study is completed.</li> </ol>
63	Design Plan Services on behalf of De Zen Realty Limited, owners of 66 & 64 Thomas Street, 95 Joymar Drive, & 65 Tannery Street (letter #71 dated December 6, 2024)		Permissions	<ol style="list-style-type: none"> <li>1. The subject property is subject to Special Site Policy 49 but the owner wants staff to reconsider the currently proposed designations applicable to the Subject Property within the new Draft OP to better align with the policy direction of the Province and Region to facilitate intensification and compact form in close proximity to higher-order transit. To this end, the owner has engaged in a DARC meeting.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted – The DARC meeting and subsequent development application process is the appropriate channel for a change to the designation in the OP.</li> </ol>
64	Design Plan Services on behalf of De Zen Realty Limited, owners of 120,	<ol style="list-style-type: none"> <li>1: 14.1.2.2.a</li> <li>2: 13.3.3.5.5</li> </ol>	Policy Revision	<ol style="list-style-type: none"> <li>1. <u>Policy 14.1.2.2(a)</u>: Requesting clarification on if 14.1.2.2(a) is applicable to the subject lands. It remains our interpretation that draft Policy 14.1.2.2(a) pertaining to development of Mixed Use Sites within Neighbourhood Character areas, does not</li> </ol>	<ol style="list-style-type: none"> <li>1. Addresses provided seem to be located within the Streetsville Node and therefore not subject to the policy. However an updated citywide policy in chapter 10 now addresses non-residential retention using formula and percentages.</li> </ol>



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	128, 142, 148, 154, 158 Queen Street South & 169 Crumie Street (letter #72 and 73.1 dated June 28 <sup>th</sup> and December 6, 2024)			<p>apply to the Subject Land, despite the fact that the Subject Land is located within an area designated as 'Mixed Use' in Schedule 7 – Land Use Designation.</p> <p>2. <u>Policy 13.3.3.5.5</u>: We appreciate the general response provided by staff and recognize the importance of non-residential employment uses in supporting the development of complete communities. However, we maintain that the replacement of commercial space should not be based on the size of the site or redevelopment, but rather on whether the planned function of the Mixed Use designation is maintained. We continue to believe that the draft policy 13.3.3.5.5 is more appropriate for redevelopment of areas designated as Mixed Use across the city, and recommend that similar wording as draft policy 13.3.3.5.5 should be applied to encourage efficient use of lands within settlement areas and promote redevelopment in a compact and sustainable form.</p>	2. Policy updated with a new citywide policy in chapter 10 now addressing non-residential retention using formula and percentages based on exiting uses and site area.
65	Joe Amato, resident of 5644 Ninth Line (letter #74 dated December 9, 2024)		Permissions	1. Requests his property (which is located along the Ninth Line) become developable. These lands are located in a flood zone.	1. Resident advised in writing and through meetings that land is within hazard Land and are subject to flood prevention policies as well as Conservation Authority policies. Resident is to assess the developability of land through the approval process.
66	Weston Consulting on behalf of 2025-2087 Dundas Street East (letter #75 dated December 9, 2024)		Follow up	1. Request to be kept up-to-date throughout the process and notified on behalf of the owner of the release of any draft policies, meetings, reports, and/or decisions as it relates to the Official Plan Review process.	1. Email has been added to the circulation list.
67	Sajecki Planning on behalf of various landowners (letter #76 dated December 9, 2024)		Policy Revision	1. It is not clear why sites near PMTSAs were not considered for similar heights as permitted in PMTSAs. We trust that city staff recognize the potential of many additional sites within the PMTSAs to support substantial growth and taller developments beyond what is currently proposed and encourage further study and exploration of opportunities to extend these height and density increase to a broader range of locations.	1. A new policy aiming to grant sites abutting MTSAs height that are compatible with those within MTSAs according to set criteria has been added.
68	Weston Consulting on behalf of Destination at Mississauga Inc owners of 5787 Hurontario Street and 20 Traders Boulevard East (letter #77 dated December 9, 2024)		Follow up	1. The landowner has an interest in monitoring and participating in the ongoing OPR process to review policy changes as it relates to the Subject Lands. We request to be notified on behalf of the landowner of the release of any draft policies, meetings, reports, and/or decisions as it relates to the OPR process.	1. Email has been added to the circulation list.
69	GSAI on behalf of Mississauga Hurontario Hotel LP and Vrancor Master GP Inc. owners of 3670 Hurontario Street (letter #78 dated March 15 <sup>th</sup> , 2024)	<u>1</u> : 12.2.4.2, 12.2.4.3 and 12.2.4.4 <u>2</u> : 5.2.2 and 5.2.4 <u>3</u> : 5.2.5 and Table 5.1 <u>4</u> : 7.3.2.3 <u>5</u> : 8.4.1.17 <u>6</u> : 8.4.5.2 <u>7</u> : 8.6.2.5 <u>8</u> : 11.3.2 & 11.3.3 <u>9-10</u> : 12.2.3.8 <u>11</u> : 12.2.8.21 a-d	Policy Revision	<p>1. <u>Policies 12.2.4.2, 12.2.4.3 and 12.2.4.4</u>: The requirement for replacement of jobs or a concentration of jobs within a development is inconsistent with the development vision established by Provincial and Regional policy objectives for the Downtown Mississauga Urban Growth Centre. Imposing employment minimums, quotas or thresholds is unnecessarily restrictive and is better addressed during the site-specific technical evaluation of a development application.</p> <p>2. <u>Policy 5.2.2. &amp; 5.2.4</u>: Affordable Housing: While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. If percentage is to remain, request that policy be amended to encourage a reduced percentage of family-sized units to be provided.</p> <p>3. <u>Policy 5.2.5 &amp; Table 5-1</u>: Affordable Housing: Questioning appropriateness of percentages on a smaller scale (City). Policy is too specific for the OP, as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing.</p> <p>4. <u>Policy 7.3.2.3</u>: Application and open-ended interpretation of this policy is inappropriate – too general.</p>	<p>1. Both policies are encouragement policy to ensure the UGC meets its targeted jobs growth.</p> <p>2. The policy is already an "encouragement" policy. Percentages are not hard requirements. Having a number stated provides a starting point for discussions between staff and developers.</p> <p>3. Policy revised to better meet its intent: "5.2.5 The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets."</p> <p>4. Policy 7.3.2.3, which is identical to current policy 8.2.1.1 is needed to ensure development supports the City's growing multi-modal network.</p> <p>5. 8.4.1.17 uses the term "relate" between built form and street right of way width which is defined as connecting to. It does not mean heights need to be equal to street right of way width.</p> <p>6. Policy deleted.</p> <p>7. Policy updated and made more general in language to provide more flexibility in built form.</p> <p>8. The Mixed use policy has been updated to provide for more flexibility using a formula and percentages based on site area.</p>

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		<u>12</u> ; Figure 12.5		<p>5. <u>Policy 8.4.1.17</u>; Restriction of building predicated on its relationship to the ROW width is inappropriate and too restrictive.</p> <p>6. <u>Policy 8.4.5.2</u>; Blanket statement for site design is too restrictive – policy should be revised to add flexibility based on site’s locational attributes and intended users.</p> <p>7. <u>Policy 8.6.2.5</u>; Request for exclusion of any development to conform to a 45-degree angular plane. There are other ways to ensure appropriate transition. The 45-degree angular plane is too restrictive and should not be the only way to regulate building heights.</p> <p>8. <u>Policies 11.3.2 &amp; 11.3.3</u>; Policies regarding replacement of non-residential floor spaces are inappropriate – should be considered on site-by-site basis.</p> <p>9. <u>Policy 12.2.3.8</u>; Restrictive and may have unintended consequences – object to policy requiring employment or office development. Does not respond to evolving community contexts, needs or market trends. Better determined through site-specific assessment.</p> <p>10. <u>Policy 12.2.3.8</u>; Object also to policy suggesting re-investment to public realm through development application.</p> <p>11. <u>Policy 12.2.8.21 a-d</u>; provide for requirements for above-grade parking structures and suggest that integrated above-grade parking structures will not directly front on to public streets and that they are required to have active or retail uses on the ground floor. We object to this policy requirement as the design of a podium or above grade parking structure should be developed on a site-specific basis.</p> <p>12. <u>Figure 12.5</u>; An illustration provides for how podium and stepbacks are to be designed and provides for an angular plane and stepping requirements on a streetwall through build-to lines. We object to this requirement being imposed on the subject lands as existing buildings or redevelopment in an already constrained area</p>	<p>9. Noted.</p> <p>10. Policy does not necessarily suggest public realm investments through development applications, although that could be a venue. These investments have generally been suggested due to its context, the neighbourhood’s mature nature and Kariya Park and the school to the south.</p> <p>11. The policy provides for general best practice designs to facilitate the integration of parking structures with the rest of the development.</p> <p>12. Figures are not part of the plan and only constitute graphic elements to clarify policies. Angular plane requirements have been revised throughout the OP to provide for more flexibility.</p>
70	Zelinka Priamo Ltd. On behalf of Choice Properties REIT owners of various properties (letter #79 dated June 24, 2024)	<u>1</u> . Bill 185 <u>2</u> . 4.3.8 and 4.3.10 <u>3</u> . 4.3.3.1 <u>4</u> . 5.5.2 <u>5</u> . 9.4.1-9.4.3 <u>6</u> . 9.4.5 <u>7</u> . 10.2.6.3 <u>8</u> . 10.2.6.4 <u>9</u> . 13.2.3.5.1 – 13.2.3.5.6 <u>10</u> . 15.4.9.3	Policy Revision	<p>1. <u>Bill 185</u>; it is fully in effect. We will continue to monitor the Draft OP as it relates to the implementation of recent legislative changes.</p> <p>2. <u>Policy 4.3.8 and 4.3.10</u>; Policy 4.3.8 should be revised to replace “will” with “should”, in order to allow for the appropriate buffer width to be determined through technical review and in consideration of the criteria of 4.3.10 (which provides several criteria to determine the “appropriate buffer width”).</p> <p>3. <u>Policy 4.3.3.1</u>; 7430 Pacific Circle is now within the Natural Hazard Area. Have concerns the lands are to be designated and zoned Greenlands as a result of the expanded mapping of the feature, and we suggest that the mapping be revised to reflect the current extent of the Natural Hazard.</p> <p>4. <u>Policy 5.2.2</u>; Policy should be revised to specify that a range and mix of housing types is required only when residential uses are proposed, current policy infers all development that is phased is required to provide a range and mix of housing types.</p> <p>5. <u>Policies 9.4.1-9.4.3</u>; there are numerous instances where retail and commercial uses are existing and appropriate outside of identified growth areas, suggest the policies be reconsidered.</p> <p>6. <u>Policy 9.4.5</u>; In our submission, there are other land use designations, including the various “Mixed Use” designations, “Residential” designations, and others, that are appropriate to accommodate retail uses. We suggest this policy be removed.</p> <p>7. <u>Policy 10.2.6.3</u>; It may not be feasible or appropriate to maintain the same amount of non-residential floor space in a redevelopment context, and we suggest that this policy introduce flexibility. We suggest that “must” be replaced with “is encouraged to”.</p> <p>8. <u>Policy 10.2.6.4</u>; there may be instances where ground oriented dwelling units may be desirable and appropriate, and we suggest that the policy be revised to introduce flexibility.</p>	<p>1. Noted.</p> <p>2. Policies are prefaced with “generally” and are in keeping with provincial requirements and best environmental practices.</p> <p>3. The Natural hazard overlay is an illustration representing the flood risk as evaluated by the Conservation Authority. It is intended to ensure safety and is to be further refined through the development review process.</p> <p>4. Noted.</p> <p>5. The policy is in keeping with the directions from the PPS 2024 and recent changes to the Planning Act.</p> <p>6. Policy deleted.</p> <p>7. New policy has been introduced with more flexibility.</p> <p>8. These considerations are best decided on a case by case basis.</p> <p>9. Policies are perceived to constitute good planning and contribute to creating affordable housing within the City.</p> <p>10. Permissions within the Employment Area will be as prescribed by the Planning Act.</p>

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				<p>9. <u>Policies 13.2.3.5.1 – 13.2.3.5.6</u>: These policies, in a manner that is similar or the same as what was included in MOPA 115, is inappropriate, given that the Ontario Land Tribunal has held that these policies are not a proper exercise of the City's authority under the Planning Act. They should be deleted.</p> <p>10. <u>Policy 15.4.9.3</u>: We seek clarification as to whether existing major retail uses in the Employment Commercial designation will be permitted to undertake minor infill and/or expansion activity, which can contribute to the number of jobs per hectare within Employment Areas.</p>	
71	Biglieri Group Ltd. On behalf of 5150 Spectrum Nominee Ltd. (owner of 5150 Spectrum Way) and 1232429 B.C. Ltd. (owner of 5040 – 5060 Spectrum Way) (letter #80 dated June 27, 2024)		Policy Revision	<p>1. <u>Land Use Designations</u>: Permissions for land be revised to include industrial uses such as warehousing, manufacturing, self-storage, small bay industrial, and contractor service shop uses.</p> <p>2. <u>Spectrum PMTSA Policies</u>: It is important for policy to contain flexibility in terms of height and area minimums to support the diverse and changing requirements of different market-driven land uses. Current policies result in limiting feasible land uses unduly.</p>	<p>1. The business employment uses does permit a diverse set of uses as well as accessory uses according to context.</p> <p>2. Height requirements for MTSA are needed to ensure these areas meet the needed densities to support transit and infrastructure investment.</p>
72	Urban Strategies on behalf of MH 1315 Silver Spear Ltd., IMH 1475 Bloor Ltd., IMH Havenwood Williamsport Ltd. For 1315 Silver Spear Road, 1475 Bloor St, 3450 Havenwood Dr and 1485 Williamsport Dr (letter #81 dated June 28, 2024)	<p><u>1.</u> 8.6.1.b</p> <p><u>2.</u> General</p> <p><u>3.</u> 10.2.5.8, 10.1.5.8, 13.3.2.3</p> <p><u>4.</u> 14.1.3.3</p> <p><u>5.</u> 13.2.3.5.1 &amp; 13.3.3.4.1</p> <p><u>6.</u> 12.2.8.21.b</p>	Policy Revision	<p>1. <u>Chapter 8, 8.6.1.b</u>: The Residential High-Rise designation would be more appropriate than Residential Mid-rise for the Bloor and Silver Spear Sites.</p> <p>2. The policy framework for the height of mid-rise buildings is confusing and should be revised or edited for clarity;</p> <p>3. <u>Policies 10.2.5.8, 10.1.5.8, 13.3.2.3</u>: Lands that are designated Residential Mid-Rise should be permitted to have building heights up to the width of the right-of-way onto which they front (consistent with draft Policy 10.2.5.8), with added recognition that heights greater than the right-of-way may be appropriate under certain and contexts, and not be otherwise limited to 8 or 12-storeys (10.1.5.8; 13.3.2.3);</p> <p>4. <u>Policy 14.1.3.3</u>: Maximum building heights in the Neighbourhoods should not be tied to the tallest existing building on the property</p> <p>5. <u>Policies 13.2.3.5.1 and 13.3.3.4.1</u>: The Erin Mills Major Node and Mall-based Community Node policies that require 10% affordable housing should be removed before the Plan is adopted</p> <p>6. <u>Policies 12.2.8.21.b</u>: Limitations on above grade parking may make providing adequate parking challenging, particularly in a rental tenure scenario. Should be softened to recognize efficient use of floorplates to meet parking requirements.</p>	<p>1. Mid-rise designation are most appropriate as infill within neighbourhoods. Additional height can be granted for mixed use sites in accordance with OP criteria as well as if found appropriate during the development review process.</p> <p>2. Revised.</p> <p>3. Revised.</p> <p>4. The policy ensures that development within these areas is generally through infill that is sensitive to such context.</p> <p>5. Policies are perceived to constitute good planning and contribute to creating affordable housing within the City.</p> <p>6. The policy intent is not to limit but to provide for design guidance especially in light of changes to parking requirements within MTASs.</p>
73	MHBC on behalf of 2814690 ONTARIO INC, owner of 2657 Dundas Street W (letter #82 dated July 5, 2024)		Policy Revision	<p>1. For the subject lands the height range is 2-12 storeys. In our opinion this does not represent an appropriate building height within a PMTSA. By restricting height to only 12 storeys, it will be extremely challenging, if not impossible, to make redevelopment of the subject lands.</p> <p>Building heights should be increased to more appropriately reflect the MTSA designations, or alternatively building heights be removed from the Official Plan and implemented through zoning. At a minimum that the Official Plan should provide criteria to be satisfied in order to support increased building height.</p>	<p>1. Changes to height can be undertaken through the development review process where a site-specific analysis will be undertaken to determine the optimal built form.</p>
74	Weston Consulting on behalf of Atlantic Packaging, owner of 5711 Atlantic Drive (letter #83 dated September 6, 2024)		Follow up	<p>1. Wish to be added to the notification list.</p>	<p>1. Email has been added to the notification list.</p>
75	Bell Canada (letter #84 dated June 20, 2024)		Follow up	<p>1. We have reviewed the document and are appreciative of the City's support in promoting and facilitating telecommunications throughout the document, Bell looks forward to Mississauga's support of the provision and expansion of reliable wireline</p>	<p>1. Noted, email has been added to the notification list.</p>

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				and wireless infrastructure as a critical component to support the community, new development and the local economy as per Section 9.1.7 - Supporting Jobs and Businesses. We would like to thank you again for the opportunity to comment, and request that Bell continue to be circulated on any future materials and/or decisions released by the City in relation to this initiative.	
76	Infrastructure Ontario regarding Bathgate Golf Centre (southwest corner of Highway #393 and Eglinton Avenue East (letter #85 dated December 19, 2024)		Policy Revision	1. This property currently accommodates a golf facility (Bathgate Golf Centre) and a large portion is also vacant. The property is subject to the Parkway Belt West Plan but also subject to a Minister's Zoning Order (Ontario Regulation 448/20) that adds long-term care and residential uses to already permitted uses in the Parkway Belt zone (PB2-1). IO kindly requests that the Official Plan reflect MZO permissions for this property, either through a site-specific exemption or an overlay designation.	1. A Special Site has been created to reflect the MZO permissions for the property.
77	Metrolinx regarding Go Stations (letter #86 dated June 27, 2024)		Policy Revision	1. Stations Planning at Metrolinx would like to facilitate more placemaking at the GO Stations. In some cases, there are opportunities we are exploring that are prohibited by the current zoning and permitted uses. We request that all GO Station lands in the City of Mississauga be zoned "Mixed Use" and permit for larger, primary office space in addition to secondary office.	1. It is not possible to re-designate all stations across the City to mixed use as each station is located within a distinct adjacent context that inform its future designations. For example some stations are within Employment Areas where is others are within mixed use communities. A more detailed and through analysis is needed in the event a station is to be redesignated.


GLOSSARY & IMPLEMENTATION					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
78	GSAI on behalf of Camcentre (1,2 & 3) Holdings Inc (135, 151, and 157 City Centre) and 3672 Kariya Drive & 134-152 Burnhamthorpe Road West (letter #10, dated March 15, 2024)	<u>1</u> : Policy 17.6 <u>2</u> : Chapter 18-4	Revision to policy & definition of 'compatible'	<ol style="list-style-type: none"> <li>1. Policy 17.6: Use of the Holding symbol -Objection to City's use of word "provision of" vs. "adequacy of" (as is in in-force MOP). Proposed new language insinuates that all requirements are to be met, regardless of site-specific basis.</li> <li>2. 'Compatible': Object revised definition - compatibility can be interpreted in various ways. Existing conditions do not need to be replicated, but development can differ without creating unacceptable adverse impacts.</li> </ol>	<ol style="list-style-type: none"> <li>1. The term "provision" is the term used in the <i>Planning Act</i> Part V. 36(2).</li> <li>2. The definition clearly states that should not be narrowly interpreted to mean "the same as" or "being similar to".</li> </ol>
79	Urban Strategies on behalf of Port Credit West Village Partners (70 Mississauga Road South and 181 Lakeshore Road West – "Brightwater Site") (letter #13, dated March 15, 2024)	<u>1</u> : 17.4.3.d. <u>2</u> : 17.4.3.b <u>3</u> : 17.4.5	Policy Revision	<ol style="list-style-type: none"> <li>1. Policy 17.4.3d.: "<i>demonstration of no adverse impacts on the development or functioning of neighbouring lands.</i>" Define "no adverse impacts" – can result in an inappropriately restrictive interpretation. The term "functioning" (not defined) can also lead to inappropriate interpretations. Suggested re-wording: "<i>The demonstration of no, or where this cannot be achieved, appropriate levels of adverse impacts on the development or functioning of neighbouring lands.</i>"</li> <li>2. Policy 17.4.3b.: Language is too strong - UD guidelines are not policy. Should be re-worded to say: "<i>Appropriate regard for all applicable Urban Design Guidelines.</i>"</li> <li>3. Policy 17.4.5: This policy, as is written, will force all minor variance applications and zoning by-law amendments that are height related to submit OPAs. This will complicate and lengthen the application process. Suggested re-word of policy: "<i>17.4.5 Transition in height and built form will occur within the height ranges where established by this Plan.</i>"</li> </ol>	<ol style="list-style-type: none"> <li>1. Adverse impacts or effects is a term used throughout the OP and the PPS and it is to be interpreted according to context.</li> <li>2. Policy updated.</li> <li>3. Many policies have been added to offer flexibility is heights in accordance with context.</li> </ol>
80	GSAI on behalf of Mississauga Hurontario Hotel LP (letters #29, dated March 15, 2024)	<u>1</u> : Policy 17.6 <u>2</u> : Chapter 18-4	Revision to policy & definition of 'compatible'	<ol style="list-style-type: none"> <li>1. Use of the Holding symbol: Objection to City's use of word "provision of" vs. "adequacy of" (as is in in-force MOP). Proposed new language insinuates that all requirements are to be met, regardless of site-specific basis.</li> <li>2. 'Compatible': Object revised definition - compatibility can be interpreted in various ways. Existing conditions do not need to be replicated, but development can differ without creating unacceptable adverse impacts.</li> </ol>	<ol style="list-style-type: none"> <li>1. The term "provision" is the term used in the <i>Planning Act</i> Part V. 36(2).</li> <li>2. The definition clearly states that should not be narrowly interpreted to mean "the same as" or "being similar to".</li> </ol>
81	GSAI on behalf of various clients (letter #32, dated March 13, 2024)	<u>1</u> : Chapter 18-4	Definition	<ol style="list-style-type: none"> <li>1. 'Compatible': Object revised definition - compatibility can be interpreted in various ways. Existing conditions do not need to be replicated, but development can differ without creating unacceptable adverse impacts. Reverse definition to existing one in section 1.1.4.r.: "<i>means development, which may not necessarily be the same as, or similar to, the existing or desired development, but nonetheless enhances an established community and coexists with existing development without unacceptable adverse impact on the surrounding area.</i>"</li> </ol>	<ol style="list-style-type: none"> <li>1. The definition clearly states that should not be narrowly interpreted to mean "the same as" or "being similar to".</li> </ol>
82	Sajecki Planning on behalf of Edenshaw (letter #41, dated March 18, 2024)	<u>1</u> : 13.1.1.3, 14.1.1.3 & 16.1.1.2	Policy revision	<ol style="list-style-type: none"> <li>1. Policies 13.1.1.3, 14.1.1.3 &amp; 16.1.1.2 Restrictive: height maximums decrease the current flexibility within OP. Policies 13.1.1.3, 14.1.1.3 &amp; 16.1.1.2 in the in-force OP identify criteria which dev. applications are evaluated when proposed heights exceed those contemplated for certain areas within City. Allows applications to be context-specific &amp; context-sensitive.</li> </ol>	<ol style="list-style-type: none"> <li>1. These policies are no longer needed as the new OP adopts a more defined approach to height either through defined PMTSA height schedules or land use designation and site specific policies. Alternative heights that are considered appropriate may be permitted when considered through the development process.</li> </ol>
83	Conservation Halton (letter #39/40.1, dated April 3, 2024)	<u>1</u> : Glossary - Valley & Stream Corridors <u>2</u> : Glossary Additions	Revise Glossary Term & Add Definitions	<ol style="list-style-type: none"> <li>1. Use language consistent with PPS and/or CA Act. Refers to rivers, creeks, streams and watercourses within "River or Stream Valleys".</li> <li>2. Add terms to Glossary: a) Essential Infrastructure, b) Natural Heritage, c) Special Management Areas and Residential Woodlands System.</li> </ol>	<ol style="list-style-type: none"> <li>1. Terms used are consistent with the PPS and align with the City's Natural Heritage strategy.</li> <li>2. Terms used are consistent with the PPS and align with the City's Natural Heritage strategy.</li> </ol>
84	TRCA (letter #49 & 50.1, dated March 28, 2024)	Valley & Stream Corridor	Definition	<ol style="list-style-type: none"> <li>1. Continue to reference the appropriate conservation authority within the term's definition due to their role in identifying location/extent of hazardous lands/sites.</li> </ol>	<ol style="list-style-type: none"> <li>1. Definition updated.</li> </ol>



GLOSSARY & IMPLEMENTATION					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
85	Sajecki Planning Inc. on behalf of BGO (formerly Bentall GreenOak) (letter #55, dated June 28, 2024)	<u>1</u> : 17.4.5		1. <u>Policy 17.4.5</u> : Transition in height and built form to occur within height ranges established by the plan. suggest replace 'will' with 'should'.	1. The wording in this policy is intended to reinforce the transition in height and built form policies throughout the OP. Alternative heights and built forms may be permitted when considered through the development application process.
86	Sajecki Planning Inc. on behalf of Edenshaw Developments Ltd. (letter #56 dated June 28, 2024)	<u>1</u> : 17.4.3 <u>2</u> : 17.4.5 <u>3</u> : 17.4.8 <u>4</u> : 17.4.14 <u>5</u> : Existing S.19.5	Policy Revision	2. <u>Policy 17.4.3</u> : replace "consistency with" with "consideration for" as it relates to applicable urban design guidelines and replace "no adverse impacts" with "minimal impacts" or add a definition for "adverse impacts". 3. <u>Policy 17.4.5</u> : Remove Policy or replace "will" with "should" (eliminating sentence starting with "it is the intent of this Plan..."). 4. <u>Policy 17.4.8</u> : consider reviewing the list of submission materials to determine the appropriate level of review for different types and scales of development. 5. <u>Policy 17.4.14</u> : Draft policy was revised to remove language that provided clarity on when a development master plan may be required. Removing the sentence: "A development master plan may be required when a development proposal may set a precedent for the use, scale and form of future development of a site area" reduces clarity. Consider reinstating the existing policy as written. 6. <u>Section 19.5</u> of the in-force OP included criteria for site-specific OP amendments. Reinstate the existing policies as written.	1. The wording was changed from "consistency with" to "regard for". Any adverse impacts should be addressed or identified through the planning rationale as part of the development application process. 2. The wording in this policy is intended to reinforce the transition in height and built form policies throughout the OP. Alternative heights and built forms may be permitted when considered through the development application process. 3. The list of submission materials is identified through the DARC process along with the scope of the various studies. Terms of Reference for the studies are available on the City's website. This list is intended to outline what materials can be requested through this process and is not an all-inclusive list. 4. Policy was revised as language is not necessary. 5. Same as 4.
87	Sajecki Planning Inc. on behalf of Starlight Developments – Multiple Sites: 2185 Sheridan Park Dr; 1970-1980 Fowler Dr; 5 Woodlawn Ave, 8 Oakwood Ave, 206-212 Lakeshore Rd E.; 2200 Roche Ct; 2233-2235 Hurontario St. (letter #58 dated June 28, 2024)	<u>1</u> : 17.4.5	Policy Revision	1. <u>Policy 17.4.5</u> – remove this policy as it treats all lands within a land use designation as the same regardless of conditions.	1. The wording in this policy is intended to reinforce the transition in height and built form policies throughout the OP. Alternative heights and built forms may be permitted when considered through the development application process.
88	Canada Lands Company (CLC) re: 1 Port Street East (letter #61 dated June 25, 2024)	<u>1</u> : 17.17.1	General Question	1. Seeking clarification for when a site may be placed in public ownership: is there a list of criteria for reference for when this may apply, or is it identified during a pre-consultation of a development application? If determined at pre-con, is there an opportunity for additional clarification surrounding the restraints and opportunities for designated Natural Hazard Lands.	1. Lands are placed into public ownership on a site-specific basis. Through the development application process, the City and appropriate conservation authority, with the submission of necessary studies or on-site evaluation, determine the limits of development and lands that are to be protected.
89	GSAI on behalf of Mississauga Hurontario Hotel LP and Vrancor Master GP Inc. owners of 3670 Hurontario Street (letter #78 dated March 15 <sup>th</sup> , 2024)		Policy Revision	1. <u>'Compatible'</u> : Object revised definition - compatibility can be interpreted in various ways. Existing conditions do not need to be replicated, but development can differ without creating unacceptable adverse impacts. 2. <u>Use of the Holding symbol</u> : Objection to City's use of word "provision of" vs. "adequacy of" (as is in in-force MOP). Proposed new language insinuates that all requirements are to be met, regardless of site-specific basis.	1. The definition clearly states that should not be narrowly interpreted to mean "the same as" or "being similar to". 2. The term "provision" is the term used in the <i>Planning Act</i> Part V. 36(2).

LOCAL AREA PLANS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
90	Sajecki Planning on behalf of Edenshaw (letter #41, dated March 18, 2024)	Port Credit LAP		<ol style="list-style-type: none"> <li>1. No major changes to PCLAP. However, chapter should reflect changes to respond to the LRT. Heights in Maps 2A, 2B &amp; 2C need to reflect recent conditions and settlements on development applications in the area. They (the heights?) also do not address emerging conditions regarding tower separation distances, transit infrastructure or market conditions.</li> <li>2. Intro language that states <i>"PC Community Node has the potential to reach the targeted density of 200 residents and jobs combined/ha for the PC PMTSA"</i> is inconsistent with the ROP's <u>minimum</u> density requirement of 200 residents and jobs combined/ha. This and other policies limit the potential of new development.</li> </ol>	<ol style="list-style-type: none"> <li>1. Height maps have been updated to reflect changes in the area. Map 2C was moved to the new Port Credit West Village Growth Node and reflects the recently approved MOPA. Heights near the Port Credit GO station and along the Hurontario corridor (future HuLRT) have been increased in certain areas to reflect future needs. Additional height in MTSAs and areas adjacent to MTSAs can be provided through the addition of new flexible policies.</li> <li>2. The section was moved to the new Port Credit Growth Node (14.2.7.1) and reflects the density targets for the PC PMTSA.</li> </ol>
91	Port Credit BIA	Port Credit LAP	Follow up	<ol style="list-style-type: none"> <li>1. Requested meeting to discuss concerns with Port Credit LAP.</li> </ol>	<ol style="list-style-type: none"> <li>1. Met with Kelly Ralston, John Papas and Marlene Baur on April 15<sup>th</sup> at 10:00a.m. to discuss concerns with plans for Lakeshore Road. OP Team presented a high-level overview of the changes made to the PC LAP but directed the PC BIA to reach out to Mark Vandersluis, Lakeshore Connecting Communities team for further discussion.</li> </ol>
92	Sajecki Planning Inc. on behalf of Edenshaw Developments Ltd. (letter #56 dated June 28, 2024)	Port Credit LAP	Policy Revision	<ol style="list-style-type: none"> <li>1. Reference made to Port Credit as an "Urban Village" with a "village mainstreet" character. Introduce a definition of "urban village" and "village Mainstreet".</li> <li>2. <u>Policy 5.2.2 and 5.2.3</u>: identifies residents to job ration of 2:1 and Policy 5.2.3 states that "Development will contribute towards the creation of employment opportunities on lands designated mixed use." Consider replacing "will" with "should".</li> <li>3. <u>Introductory language of Section 5.2</u> - Regional Official Plan notes 200 residents and jobs per hectare is a minimum density. Revise language to reflect a minimum density of 200 residents and jobs per hectare.</li> <li>4. <u>Built form policies 12.2.1.2 and 12.2.1.3</u> – identify smaller floor plate sizes and minimum separation distances to achieve a number of built form objectives that can be achieved through a variety of design solutions. Consider removing references to floor plate size and building separation distances.</li> </ol>	<ol style="list-style-type: none"> <li>1. Urban village refers to Port Credit having more of a smaller village feeling while being located in an area where a lot of growth is happening. The other term has been removed.</li> <li>2. These policies have been updated.</li> <li>3. The section was moved to the new Port Credit Growth Node (14.2.7.1) and reflects the density targets for the PC PMTSA.</li> <li>4. These policies have been deleted.</li> </ol>

SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
93	Pound & Stewart on behalf of Orlando Corporation ("Heartland Business Community") Proposed Gateway Corporate Centre Employment Area (letter #2, dated March 14, 2024)	<u>1</u> : Sch. 6 <u>2</u> : New Sch. <u>3</u> : Sch. 7	New Schedule Suggestion & Removal of layer	<ol style="list-style-type: none"> <li><u>Schedule 6</u>: Introduction of 26m-35m as new ROW width: how was this new standard determined, and how and where will it be applied in the future? Is this a generic representation of city planning objectives or unique to specific circumstances?</li> <li><u>New Schedule</u>: Addition of a "Strategic Goods Movement Network" Schedule, reflective of the one found within the Region of Peel OP.</li> <li><u>Schedule 7</u>: Remove "1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours" layer from Schedule 7 (including sub-Schedules 7A-7N). The layer is redundant and outdated, as both Region and City's OPs identify the contours for <i>informational purposes only</i>. To remain only on Figure 4.17.</li> </ol>	<ol style="list-style-type: none"> <li>26m to 35m were not introduced. These Right of Way widths are part of schedule 6 of current MOP.</li> <li>Map 7-1 is now part of the OP reflecting the Goods Movement Network.</li> <li>The layer is for informational purposes only and provides context when looking at Schedule 7.</li> </ol>
94	BA Consulting Group Ltd. on behalf of Port Credit West Village Partners (PCWVP) for Brightwater Redevelopment (letter #3, dated March 13, 2024)	<u>1-2</u> : Sch. 3 <u>3-4</u> : Sch. 4 <u>5</u> : Sch. 5	Revision to Schedule Requested	<ol style="list-style-type: none"> <li><u>Schedule 3 - Exhibit 2</u>: inconsistency with the land use designation for the Brightwater Site. The Future Minor Collector roads shown in the draft OP for the Brightwater Site categorized as "Strategic Growth" roads despite Brightwater Lands classified elsewhere within the draft OP as a "Neighbourhood" (including Schedule 1).</li> <li><u>Schedule 3</u>: Mississauga Road South is shown as a Future Minor Collector road link in the draft OP schedule despite the fact it is an existing road</li> <li><u>Schedule 4</u>: Recommended transit network solution outlined in the 2019 Lakeshore Connecting Communities Transportation Master Plan is not included in new OP, which includes a Lakeshore Express Bus Rapid Transit (BRT) route in the short term and a streetcar extension along Lakeshore Road West to Mississauga in the longer term (The "Waterfront West LRT" Transit route is shown on the Province's Regional Transportation Plan running from Toronto to west of the Credit River). [...] Expected Lakeshore Road west of Hurontario Street to have been shown in the draft OP as a "Future Enhanced Transit Route" or a "Transit Priority Corridor".</li> <li><u>Schedule 4</u>: Proposed transit hub is not included on the Brightwater Site that was shown in the 2019 Lakeshore Connecting Communities Transportation Master Plan.</li> <li><u>Schedule 5</u>: The draft OP has not noted the planned cycling routes within the Brightwater Site (connecting Lakeshore Road West to the Waterfront Trail) including the primary on-road / boulevard route on Mississauga Road South from Lakeshore Road to the Waterfront Trail (built in 2023) and the off-road route proposed along the western edge of the Site, and the on-road bicycle facilities on The Brightwater Boulevard running north-south through the centre of the site.</li> </ol>	<p>1-2: The street classification at the Brightwater site was developed while the Port Credit MTSA boundary was still under discussion. Based on the information the team had at the time, the streets within the Brightwater site were classified as Minor Collector Strategic Growth. Since then, the Port Credit MTSA boundaries have been delimited and do not include the streets within the Brightwater site. Based on the current information, the Mississauga Official Plan Schedules 3 Long Term Road Network will be updated to correctly display the streets within the Brightwater site classified as Minor Collector Neighborhood.</p> <p>3-5: Please note that there is still a number of transportation related studies under development in the surrounding area. Alternative transit solutions, including the recommended Lakeshore Express Bus Rapid Transit, are still under analysis. The OP may be updated based on the results from these studies; however, at this time the City believes that Schedule 4 from the Draft OP best represents the Long Term Transit Network.</p>
95	Pound & Stewart on behalf of Hensall Landholdings c/o Cooksville Steel Ltd (510 Hensall Circle) (letter #4, dated March 14, 2024)	<u>1</u> : Sch. 7 <u>2-3</u> : Sch. 8g <u>4</u> : Map 11.3	Revision to Schedule Requested, MTSA: Revision to Schedule Requested; Modification to figure caption and revision to Map 11-3	<ol style="list-style-type: none"> <li><u>Schedule 7</u>: Add the "Mixed Use Limited" land use designation on Schedule 7 (and sub-set Schedules). Without this layer, the subject property appears to remain designated "Business Employment".</li> <li><u>Schedule 8g</u>: request modification - 510 Hensall Circle appears to be located within the boundary of the "Dixie Employment Area" (which is incorrect).</li> <li><u>1225 Dundas St. E.</u>: "Mixed Use" designation height permission is inappropriate. MTSA policy framework should be modified to identify the evaluation criteria for additional height beyond max identified in Schedule 8.</li> <li><u>Map 11-3</u>: Prematurely illustrates a "Proposed Public Road" located east-west across the subject property. Future redevelopment of subject property should consider the context and character of the proposed development or redevelopment to assess the need of a public street or road.</li> </ol>	<ol style="list-style-type: none"> <li>Completed.</li> <li>Completed.</li> <li>Height maximums have been increased to 12 storeys, where previously they were 9 storeys.</li> <li>Map is taken from the Council approved Dundas Connects study which is reflected in the new Official Plan. Road network is for illustration purposes.</li> </ol>
96	Pound & Stewart on behalf of Orlando Corporation "Heartland Town	<u>1</u> : Sch. 6 <u>2</u> : Sch. 7 <u>3-4</u> : Sch. 7F	Removal of layer & Land Use Designation	<ol style="list-style-type: none"> <li><u>Schedule 6</u>: Introduction of 26m-35m as new ROW width: how was this new standard determined, and how and where will it be applied in the future? Is this a generic representation of city planning objectives or unique to specific circumstances?</li> </ol>	<ol style="list-style-type: none"> <li>26m to 35m were not introduced. These Right of Way widths are part of Schedule 6 of current MOP.</li> <li>The layer is for informational purposes only and provides context when looking at Schedule 7.</li> </ol>

SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
	Centre" (letter #6, dated March 14, 2024)			<ol style="list-style-type: none"> <li><u>Schedule 7</u>: Remove "1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours" layer from Schedule 7 (including sub-Schedules 7A-7N). The layer is redundant and outdated, as both Region and City's OPs identify the contours for <i>informational purposes only</i>. To remain only on Figure 4.17.</li> <li><u>Schedule 7F</u>: Existing industrial property located at north-east corner of Matheson Blvd. &amp; Terry Fox Way designated "Business Employment". Consider modification of this land use to the same "Mixed Use" that applies to surrounding areas.</li> <li><u>Schedule 7F</u>: Request to change the land use designation east of Mavis Road (south of Rodeo Dr &amp; Regal Dr) from 'Employment Commercial' to 'Mixed Use'</li> </ol> 	<ol style="list-style-type: none"> <li>Land designation cannot change without a site specific study or an application to amend the OP.</li> <li>Changed.</li> </ol>
97	GSAI on behalf of Camcentre (1,2 & 3) Holdings Inc (135, 151, and 157 City Centre) and 3672 Kariya Drive & 134-152 Burnhamthorpe Road West (letter #10, dated March 15, 2024)	<p><u>1</u>: Map 12-2.3  <u>2</u>: Map 12-2.7  <u>3</u>: Map 12-2.8  <u>4</u>: Figure 12.5  <u>5</u>: Sch. 7 &amp; 8  <u>6</u>: Ch. 10</p>	Map questions	<ol style="list-style-type: none"> <li><u>Map 12-2.3</u>: Objection to illustration of future park on western edge of subject lands – should be removed (3672 Kariya Drive &amp; 134-152 Burnhamthorpe Road West).</li> <li><u>Map 12-2.7</u>: Objection to policies that stipulate access, entrance or built form restrictions to either an A or B street – should be assessed through site-specific design</li> <li><u>Map 12-2.8</u>: Objection to City's inclusion of retail activation policies – restrictive. Further, policy 12.2.9.12 restricts uses allowed within retail activation frontages</li> <li><u>Figure 12.5</u>: Rejection of angular plane and stepping requirements on streetwall – should be site-specific.</li> <li><u>Schedules 7 &amp; 8</u>: Discrepancies between Schedules 7 &amp; 8, in relation to the Downtown Mixed Use designation category.</li> <li><u>Chapter 10</u>: Downtown Mixed Use category not identified in Chapter 10, discrepancies between LU designations and policy framework in Chapter 10 and Schedules 7.</li> </ol>	<ol style="list-style-type: none"> <li>Map 12-2.3 is only conceptual. More discussions will take place prior to determining final locations of future parks.</li> <li>These policies establish a hierarchy that guides future development, a more refined assessment will be undertaken during the development stages in accordance with these policies.</li> <li>The retail activation strategy and associated policy are part of the current LAP and are needed to ensure the Downtown remains a vibrant mixed-use community.</li> <li>Figures are for illustration purposes and are not enforceable.</li> <li>Changes will be made to reflect April 11<sup>th</sup> decision from regional council.</li> <li>Listed under section 10.3 Land Use Designations in Local Area Plans.</li> </ol>
98	GSAI on behalf of BET Realty Ltd. And 3420 Hurontario Street Incorporated (3420 & 3442 Hurontario Street) (letter #11, dated March 15, 2024)	<p><u>1-3</u>: Sch. 7 &amp; 8  <u>4-5</u>: Sch. 8k</p>	Discrepancies of Schedules & MTSA	<ol style="list-style-type: none"> <li>Schedules 7 identified land uses by height, however Schedules 8 continue to identify LUs by density.</li> <li>Re-designation of lands from "Residential High Density" to Residential High-Rise". Active SPA for Site introduces low-rise, townhouse built forms, but draft policies (10.2.5.10 &amp; 10.2.10.11) state that heights greater than 8 storeys are permitted, or alternatively, lower rise built forms as accessory to an apartment structure on same lot, suggesting that requested townhouses are not permitted.</li> <li>Discrepancies in designations between Schedules 7 &amp; 8.</li> <li><u>Schedule 8k</u>: OLT Decision &amp; Council Resolution 0031-2023 (February 1, 2023) approved OPA redesignated property as "Residential High Density" with expressed permissions for "two apartment dwellings with maximum heights of 33 &amp; 30 storeys" – should be reflected in Schedule</li> </ol>	<ol style="list-style-type: none"> <li>Changed.</li> <li>Area is within MTSA and is intended for transit-supportive built forms.</li> <li>Changes will be made to reflect April 11<sup>th</sup> decision from regional council.</li> <li>Update Schedule 8k to reflect OLT decision, redesignating lands to Residential High Rise.</li> <li>Updated.</li> </ol>

SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
				5. <u>Schedule 7</u> : entire property designated as Residential High-Rise, as well as policies for Special Site 106 (16.106.1-16.106.3)	
99	Urban Strategies on behalf of SmartCentres REIT (3155 Argenta Road/Meadowvale, 1100 Burnhamthorpe Road and 780 Burnhamthorpe Road) (letter #12, dated March 15, 2024)	<u>1</u> : Sch. 1 <u>2-4</u> : Sch. 7	Redesignation of lands	<ol style="list-style-type: none"> <li><u>Schedule 1</u>: Redesignations of Meadowvale &amp; 1100 Burnhamthorpe lands to "Community Node"</li> <li><u>Schedule 7</u>: Portions of Meadowvale &amp; 1100 Burnhamthorpe supported for conversion by City staff be redesignated Mixed Use</li> <li><u>Schedule 7</u>: Portions of Meadowvale not requested for conversion and portions of 1100 Burnhamthorpe not supported for conversion be maintained as Mixed Use Limited</li> <li><u>Schedule 7</u>: Maintain 780 Burnhamthorpe as Mixed Use Limited</li> </ol>	<ol style="list-style-type: none"> <li>1-3. conversion for sites 1 and 2 has been completed and policies are now part of the draft OP for review (changes to schedules and sites 178 and 179).</li> <li>4. Mixed Use Limited is not appropriate for 780 Burnhamthorpe Rd. W. The City has already completed a land use compatibility study for the site that determined sensitive land uses are not appropriate due to potential conflicts with surrounding industry.</li> </ol>
100	GSAI on behalf of Camilla Towns Inc. (2040 Camilla Road) (letter #15, dated March 15, 2024)	<u>1-2</u> : Schedules 7 & 8	Site specific re-designation	<ol style="list-style-type: none"> <li>Re-designation of lands from "Residential High Density" to Residential High-Rise". Active SPA for Site introduces low-rise, townhouse built forms, but draft policies (10.2.5.10 &amp; 10.2.10.11) state that heights greater than 8 storeys are permitted, or alternatively, lower rise built forms as accessory to an apartment structure on same lot, suggesting that requested townhouses are not permitted.</li> <li>Discrepancies in designations between Schedules 7 &amp; 8.</li> </ol>	<ol style="list-style-type: none"> <li>Area is within MTSA and is intended for transit-supportive built forms.</li> <li>Updated.</li> </ol>
101	GSAI on behalf of Equity Three Holdings Inc. (3085 Hurontario St) (letter #16, dated March 15, 2024)	<u>1</u> : Schedules 8m & 8a-r	MTSA	<ol style="list-style-type: none"> <li>Arbitrary height maximum of 30 storeys – remove proposed height maximums (or significantly increase them, due to their location and the potential that exists).</li> </ol>	<ol style="list-style-type: none"> <li>Height is compatible with surroundings – more flexibility and additional height can be achieved through new policies related to IZ units and non-residential replacement.</li> </ol>
102	GSAI on behalf of Lakeview Community Partners Ltd. (1082 Lakeshore Road East and 800 Hydro Rd) (letter #18, dated March 15, 2024)	<u>1</u> : Sch. 1 <u>2</u> : Sch. 2 <u>3</u> : Sch. 3 <u>4</u> : Sch. 4 <u>5</u> : Sch. 5 <u>6</u> : Sch. 6 <u>7</u> : Sch. 7N <u>8</u> : Sch. 8Q	Inconsistencies between Schedules and approved development application	<ol style="list-style-type: none"> <li><u>Schedule 1</u>: Clarify policy intent and impact on eMZO provisions – how does the new defined employment area impact density, height design, etc.?</li> <li><u>Schedule 2 &amp; 7N</u>: Revise schedule - "Natural Hazard" limits reflect old mapping, not reflective of development application review.</li> <li><u>Schedule 3</u>: Revise schedule – no other section of City has specificity with included road names. If names are to be included on Schedule, they are to be revised accordingly based on City Council approved names for subdivision.</li> <li><u>Schedule 4</u>: Clarification of labels – what are the policy implications of having Lakeshore Road East noted as "Light Rail Transit Corridor" when the City's EA work is to have a BRT on this road? Also, a "Future Enhanced Transit Route" loop is noted – appears to be the only place in the part of the City where this applies. Are there intentions for any different kind of transit service by MiWay within the lands which warrants noting this enhanced transit notion?</li> <li><u>Schedule 5</u>: Revise schedule – why do our client's lands have specificity of roads showing? Does not show anywhere else. Does the "Primary On-Road" and "Primary off-Road" match the final design of cycling infrastructure approved by the City through the draft plan of subdivision.</li> <li><u>Schedule 6</u>: Revise schedule – difference between City approved development application vs. what's shown on schedule. Street A &amp; Street H/Hydro Road City approved road width. This Major Node has more detail/specificity compared to other areas in City.</li> <li><u>Schedule 7N</u>: Northwest corner of Street A and Street H incorrectly depicts Residential Low Rise II when this block has been approved for Residential High Rise (Block 8). Also, limit of the Major Node should include water, similar to Port Credit Community Node.</li> </ol>	<ol style="list-style-type: none"> <li>Changes as per the MZO are now reflected in the OP.</li> <li>Natural Hazard mapping reflects most up to date data as provided by the Conservation Authority and is for illustrative purposes only.</li> <li>Names removed.</li> <li>It is not labeled as "light rail Transit" but as "higher order transit corridor" as identified in the City's TMP and other transportation documents.</li> <li>These reflect the latest Long Term Cycling Routes which will be refined as it is implemented.</li> <li>This is needed to guide the development of the Node. This is also the case since the site was subject to in-depth planning studies.</li> <li>Changed. Water is not taken into account since it is considered not buildable.</li> <li>Revised.</li> </ol>



SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
				8. <u>Schedule 8Q</u> : Revised schedule – remove heights that are noted. Also, inconsistencies with Schedule 7N – Residential Medium Density should be replaced with Residential High-Rise. Also, incorrect depiction of Public Open Space at northwest corner of Street A & H when block has been approved for residential development. Schedule should also remove linework in middle of node that doesn't seem to signify anything but should also include lands purchased by client for extension of Lakefront Promenade.	
103	GSAI on behalf of Kings Mill Homes Development 1 & 2 Inc. (150 and 180 Rutledge Rd) (letter #20, dated March 15, 2024)	<u>1-2</u> : Sch. 7 <u>3</u> : Sch. 8a-8r	Designation	<ol style="list-style-type: none"> <li>1. Retain current designation - subject Lands have been “down designated” from Residential High Density to Residential Mid-Rise – seemingly without sound planning. Based on ROW, heights would be capped at 7 storeys, which is inappropriate for site and down designation from existing High Density designation.</li> <li>2. “Natural Hazards” lands designation has been extended across entire 150 Rutledge Road that extends over CP Rail tracks. Site was cleared and filled so this overlay is inaccurate and should be deleted or revised to reflect current site conditions. Survey has been confirmed in the field with CVC staff.</li> <li>3. <u>Schedules 8a-8r</u>: Discrepancies between LU designations and policy framework in Chapter 10 and those presented.</li> </ol>	<ol style="list-style-type: none"> <li>1. New designation reflects the current permissions and envisioned potential for the site.</li> <li>2. The Natural hazard overlay is an illustration representing the flood risk as evaluated by the Conservation Authority. It is intended to ensure safety and is to be further refined through the development review process.</li> <li>3. Changed.</li> </ol>
104	GSAI on behalf of Montcrest Asset Management (51, 57 Tannery Street & 208 Emby Drive) (letter #21, dated March 15, 2024)	<u>1</u> : Schedule 7	Designation	<ol style="list-style-type: none"> <li>1. <u>Schedule 7</u>: Retain current designation - Subject Lands have been “down designated” from Residential High Density to Residential Mid-Rise – seemingly without sound planning. Based on ROW, heights would be capped at 7/8 storeys, which is inappropriate for site and down designation from existing High Density designation.</li> </ol>	<ol style="list-style-type: none"> <li>1. New designation reflects the current permissions and envisioned potential for the site.</li> </ol>
105	GSAI on behalf of Morguard Corp (2896 Battleford Road) (letter #22, dated March 15, 2024)	<u>1-2</u> : Sch. 7 <u>3</u> : Sch. 7 & 8 <u>4</u> : Ch. 10	Discrepancies of Schedules	<ol style="list-style-type: none"> <li>1. <u>Schedule 7</u>: Retain current designation - Subject Lands have been “down designated” from Residential High Density to Residential Mid-Rise – seemingly without sound planning. Based on ROW, heights would be capped at 7/8 storeys, which is inappropriate for site and down designation from existing High Density designation.</li> <li>2. <u>For Morguard Site</u>: OPA 115, as per recent Phase 2 settlement, permits max heights of 18 storeys which conflicts with new recommendation. Adjacent properties outside of the Community Node also have inconsistent height allowances. Inconsistencies in intention of policy.</li> <li>3. <u>Schedules 7 &amp; 8</u>: Discrepancies between Schedules 7 &amp; 8, in relation to the Downtown Mixed Use designation category.</li> <li>4. <u>Chapter 10</u>: Downtown Mixed Use category not identified in Chapter 10, discrepancies between LU designations and policy framework in Chapter 10 and Schedules 7.</li> </ol>	<ol style="list-style-type: none"> <li>1. new designation reflects the current permissions and envisioned potential for the site.</li> <li>2. Adjusted.</li> <li>3. Changed.</li> <li>4. Listed under section 10.3 Land Use Designations in Local Area Plans.</li> </ol>
106	GSAI on behalf of Stephen-Mitchell Realty Ltd, Whitehom Investments Ltd & Lynrob Investments (1225 Dundas St E) (letters #24, dated March 15, 2024)	<u>1</u> : Sch. 8a-8r <u>2</u> : Sch. 8g <u>3</u> : Sch. 8	MTSA: Revision to Schedule Requested	<ol style="list-style-type: none"> <li>1. <u>Schedules 8a-8r</u>: Discrepancies between LU designations and policy framework in Chapter 10 and those presented in Schedules 8a-8r.</li> <li>2. <u>Schedule 8g</u>: request modification - 510 Hensall Circle appears to be located within the boundary of the “Dixie Employment Area” (which is incorrect).</li> <li>3. <u>Schedule 8: 1225 Dundas St. E</u>: “Mixed Use” designation height permission is inappropriate. MTSA policy framework should be modified to identify the evaluation criteria for additional height beyond max identified in Schedule 8.</li> </ol>	<ol style="list-style-type: none"> <li>1. Changed.</li> <li>2. Updated.</li> <li>3. Heights have been increased in select areas to 12 storey in addition to flexibility when providing for IZ and non-residential units.</li> </ol>
107	GSAI on behalf of City Park Homes Inc. (letter #27, dated March 15, 2024)	<u>1</u> : Schedule 7 & Chapters 10 & 16	Down Designation	<ol style="list-style-type: none"> <li>1. <u>Schedule 7</u>: Concerning redesignation of Subject Lands re-designated from MU and Residential Medium Density to MU and Residential Low Rise II. Proposed designations represent a down designation of the Subject Lands. Request that MOP 2051, Schedules</li> </ol>	<ol style="list-style-type: none"> <li>1. Updated.</li> </ol>

SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
				7 & Ch. 16 be updated to ensure the development & incorporation of permissions established in OPA 167.	
108	Montcrest Asset Management (51, 57 Tannery St & 208 Emby Dr) (letter #28, dated March 15, 2024)	<u>1</u> : Schedule 7F	Heights	1. Landowners are proposing heights from 12-14 storeys to achieve FSI of 2.47. The proposed restriction of height to be no taller than the width of the street would limit the height to 6 storeys, leading to an FSI that does not align with transit-supportive densities.	1. Will be considered during the development approval process.
109	GSAI on behalf of Mississauga Hurontario Hotel LP (letter #29, dated March 15, 2024)	<u>1-2</u> : Sch. 7 & 8 <u>2</u> : Sch. 7 <u>3</u> : Map 12-2.3 <u>4</u> : 12-2.7 <u>5</u> : 12-2.8 <u>6</u> : Fig. 12.5	Discrepancies of Schedules	1. <u>Schedules 7 &amp; 8</u> : Discrepancies between Schedules 7 & 8, in relation to the Downtown Mixed Use designation category. 2. <u>Schedule 7</u> : Downtown Mixed Use category not identified in Chapter 10, discrepancies between LU designations and policy framework in Chapter 10 and Schedules 7. 3. <u>Map 12-2.3</u> : Objection to illustration of future park on western edge of subject lands – should be removed (3672 Kariya Drive & 134-152 Burnhamthorpe Road West). 4. <u>Map 12-2.7</u> : Objection to policies that stipulate access, entrance or built form restrictions to either an A or B street – should be assessed through site-specific design 5. <u>Map 12-2.8</u> : Objection to City's inclusion of retail activation policies – restrictive. Further, policy 12.2.9.12 restricts uses allowed within retail activation frontages 6. <u>Figure 12.5</u> : Rejection of angular plane and stepping requirements on streetwall – should be site-specific	1. Changed. 2. Listed under section 10.3 Land Use Designations in Local Area Plans. 3. Map 12-2.3 is only conceptual. More discussions will take place prior to determining final locations of future parks. 4. These policies establish a hierarchy that guides future development, a more refined assessment will be undertaken during the development stages in accordance with these policies. 5. The retail activation strategy and associated policy are part of the current LAP and are needed to ensure the Downtown remains a vibrant mixed-use community. 6. Figures are not policy. Policy 8.6.2.5 Policy updated and made more general in language to provide more flexibility in built form.
110	GSAI on behalf of Hillmond Investments Ltd. (377 Burnhamthorpe Rd E) (letter #31, dated March 15, 2024)	<u>1</u> : Sch. 8c <u>2</u> : Sch. 8a-r	MTSA	1. <u>Schedule 8c</u> : Subject Lands identified as being within the Central Parkway PMTSA, without a LU designation specified and having a max building height of 2-4 storeys. Request clarification on how development applications for heights above those established will be evaluated. Also, identified height permission of 4 storeys is contrary to 8 storey height permission allowed for 1 acre MU sites in Neighbourhood Character Areas (14.1.2.2) 2. <u>Schedules 8</u> : Discrepancy between LU designations assigned to PMTSA lands and LU and policy framework in Ch. 10. Concerning and requires modification.	1. Policy was updated to ensure Mixed use sites over 1 ha can be subject to 8 storey heights despite MTSA height caps. 2. Changes will be made to reflect April 11 <sup>th</sup> decision from regional council.
111	GSAI on behalf of various clients (letter #32, dated March 13, 2024)	<u>1</u> : Sch. 7 <u>2-3</u> : Sch. 8	Designation	1. <u>Schedule 7</u> : Retain current designation – numerous properties have been seemingly “down designated”. There also seems to be inconsistencies with the designations in Schedule 7 & Schedule 8. In times of conflict, MTSA policies will prevail – request for Schedule 7 uses to be re-examined. 2. <u>Schedules 8</u> : Discrepancy between LU designations assigned to PMTSA lands in Schedules 7 & Schedule 8. In times of conflict, MTSA policies will prevail – request for Schedule 7 uses to be re-examined. 3. <u>Schedule 8</u> : Maximum building heights for some MTSA lands are low – evaluation criteria should be established on how to permit additional heights	1. New designation reflects the current permissions and envisioned potential for the site. – designations updated. 2. Changed. 3. Heights were increased in select areas. Additional policies offering flexibility for IZ units and non-residential uses were added to allow for higher heights without amendments to the plan.
112	GSAI on behalf of Park Heights Ltd (65 Park St E) (letter #33, dated March 15, 2024)	<u>1</u> : Schedule 8n	MTSA	1. Request for greater height maximums than existing heights on site. Height maximums do not reflect what can be achieved on the site. A 15 storey height cap seems arbitrary and should be increased to at least 22 storeys, similar to neighbouring lands.	1. Heights were increased in select areas. Additional policies offering flexibility for IZ units and non-residential uses were added to allow for higher heights without amendments to the plan.
113	GSAI on behalf of Derry Britannia Development Ltd (letter #36, dated March 15, 2024)	<u>1</u> : Sch. 7 <u>2</u> : Sch. 8d	Designation	1. Subject Lands are being redesignated from “Residential Medium Density” to “Residential Mid-Rise”, while maintaining the “Parkway Belt West” designation and applying a Natural Hazards policy overlay. Designation of “Residential Mid-Rise” and maintenance of the “Parkway Belt West” designation are contrary to the approved development vision for lands. Also, application of Natural Hazards policy overlay is restrictive & contrary to City-approved development for lands. Owner successfully	1. Designations reflect the current permissions. Natural Hazard overlay has been updated to reflect latest Conservation Authority mapping. 2. The Parkway Belt West Plan policies are still in-force and effect - lands are subject to its direction.

SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
				<p>obtained Parkway Belt West Plan Amendment in 2022 to facilitate redevelopment. A City-initiated OPA is therefore required to recognize this and re-designate the site.</p> <p>2. <u>Schedule 8d</u>: Concerned with land use designation of Subject Lands. Request for lands to be entirely designated 'Residential Medium Density' given the Parkway Belt West Plan is no longer applicable.</p>	
114	GSAI on behalf of Eight Acres Ltd. (2434-2490 Shepard Ave) (letter #38, dated March 15, 2024)	<u>1-2</u> : Sch. 7 <u>3</u> : Sch. 8a-8r <u>4</u> : Sch. 8l	MTSA	<p>1. <u>Schedule 7</u>: Retain current designation - Subject Lands have been "down designated" from Residential High Density to Residential Low-Rise II.</p> <p>2. <u>Schedule 7</u>: Residential Low-Rise II on Schedule 7 is inconsistent &amp; conflicts with 'Residential High Density designation on Schedule 8l.</p> <p>3. <u>Schedules 8a-8r</u>: Discrepancies between LU designations and policy framework in Chapter 10 and those presented</p> <p>4. <u>Schedule 8l</u>: Request for additional policy direction to determine how development applications that desire heights above those established by MTSA Schedules are evaluated. Current height limits are restrictive.</p>	<p>1. New designation reflects the current permissions and envisioned potential for the site.</p> <p>2. Changed.</p> <p>3. Changed.</p> <p>4. Additional flexibility has been added including additional heights.</p>
115	Conservation Halton (letter #39/40.1, dated April 3, 2024)	<u>1-2</u> : Schedule 2	Natural hazard	<p>1. Recommend inclusion of all CH regulated lands, i.e. watercourses, flooding and erosion, (meander belt and stable top of bank) hazards, and 15m allowances from the greater of those hazards. In addition, recommend inclusion of wetlands and associated regulated areas (i.e. 30m limits of feature)</p> <p>2. Ensure natural hazard &amp; wetland layers reflect current info. Contact CH for updated mapping layers. Regulated limits along Ninth Line should be based on limits from SWS (subject to change as development of Transitway progresses)</p>	<p>1. The necessary up to date data was incorporated to create the new Natural Hazard overlay and NHS features.</p> <p>2. Noted.</p>
116	Plan Logic on behalf of Ahmed Group (various properties) (letter #42/43.1, dated March 18, 2024)	<u>1</u> : Sch. 1 <u>2-3</u> : Sch. 6 <u>4</u> : Sch. 7 <u>5</u> : Sch. 7 & 8h <u>6-7</u> : Sch. 8g	Redesignation of lands & MTSA	<p>1. <u>Schedule 1</u>: Request redesignation of 6405 Hurontario Street to Major Node. Request that this site also be removed from Map 15-1 Employment Areas</p> <p>2. <u>Schedule 6</u>: Confirm inconsistency: Schedule 6 designates Dundas St E with a ROW width of 42m whereas Table 7-2, Line 27 indicates a width of 35m.</p> <p>3. <u>Schedule 6</u>: Note 2, Table 7-2 and policy 7.3.2.6 give the City the ability to modify ROW requirements based on EA studies for the Dundas BRT. Client therefore has no certainty of ROW widths adjacent to lands. Request exemption from the above mentioned note, table and policy.</p> <p>4. <u>Schedule 7</u>: Request for redesignation of lands at 15, 19, 23 &amp; 27 Pearl Street to be redesignated to Residential High-Rise.</p> <p>5. <u>Schedule 7 &amp; 8h</u>: Request 6405 Hurontario Street be designated Mixed Use and Area Exemption from LBPA Operating Area (Schedule 7). Request for Schedule 8h to show minimum 1 storey building height as well. Request adding site-specific policy within Chapter 16 permitting a range of development densities at 6405 Hurontario St.</p> <p>6. <u>Schedule 8g</u>: Request for redesignation: from Employment Commercial to Residential High Rise, conforming to the new ROP without the need for an OPA.</p> <p>7. <u>Schedule 8g</u>: Request to add site-specific policy allowing a broader range of commercial uses on the ground floor: office, retail store, financial institution, personal service establishment, restaurant, take-out restaurant, and veterinary clinic</p> <p>8. Plan Logic welcomes opportunity to meet with staff.</p>	<p>1. Site is within an MTSA and the City's Employment Area. At the moment identifying addition Nodes other than the ones shown on schedule 1 is not part of the scope of the OP review.</p> <p>2. Changed.</p> <p>3. Table applies city-wide is in keeping with city's TMP and other transportation plans and documents.</p> <p>4. Redesignation is to be undertaken on a site by site basis and through the approval process.</p> <p>5. Site is within the City's Employment area, mixed use designations are not permitted. The Operating Area is managed by the LBP Airport Authority and subject to regulations under the PPS according to NEF/NEP levels.</p> <p>6. ROP is being repealed and included into the OP. The lands will remain within the employment area as designated to protect the integrity and the viability of the area.</p> <p>7. This is best undertaken on a site by site basis and through the approval process.</p> <p>8. Given the ongoing OLT appeals related to the subject lands, legal counsel continue to work and communicate directly with the Client's legal counsel on this matter.</p>
117	Joe Amato (5644 Ninth Line) (letter #47 & virtual online meeting on April 4 with Joe & David Amato)	<u>1</u> : Schedule 7E	Redesignation	<p>1. Request the fulfillment of promises made prior to annexation, and presented at Council July 4, 2018, to redesignate lands to Residential Low-Rise 1. He has been in communication with Conservation Halton but understands that through the More Homes Built Faster Act's amendment to the Conservation Authorities Act, municipalities can override their authority and redesignate properties.</p>	<p>1. OP Staff met with Joe &amp; David Amato on April 4, 2024 to discuss concerns. Then on January 14, 2025. Property will be assessed through the development approval process.</p>

SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
118	TRCA (letter #49 & 50.1, dated March 28, 2024)	<u>1</u> : Schedule 2	Mapping update	1. As part of Etobicoke Creek Watershed Plan (ECWP) (still in draft), the natural system mapping was completed, which can be provided upon request.	1. Please provide any mapping you have completed before the adoption of the OP so that we may update the applicable sections.
119	MHBC on behalf of TCPL (letter #50, dated May 14, 2024)	<u>1</u> : Schedules 1 & 7	Mapping update	1. Request to have TCPL's pipelines shown on Schedules 1 & 7. Can provide GIS shapefiles	1. The OP do not typically include pipelines and other servicing infrastructure on schedules.
120	GSAI on behalf of KJC Properties Inc. (letter #51, dated June 28, 2024)	<u>1</u> : Schedule 7 <u>2</u> : Schedule 8a through 8r <u>3</u> : Schedule 8g	Redesignation	1. Schedule 7 identifies lands as "Mixed Use" which is inconsistent with the designation applied to the site by MOPA 169 which is "Residential High Density" and should be reflected as such. 2. The land use designations identified on Schedules 8a-8r do not align with the land use designations and policy framework presented in Chapter 10 and Schedule 7. This requires modification. 3. Subject lands are located within the Cawthra Protected MTSA and designated "Mixed Use" with a max building height of 12 storeys. Concerned with the discrepancy in land use designations and the absence of a policy framework outlining evaluation criteria to permit building height above and beyond what is specified in Schedule 8 (requires modification).	1. Noted, however Schedule 7 correctly identifies the lands as "Residential High Density". 2. Changed. 3. Additional flexibility has been added including additional heights.
121	GSAI on behalf of Starmont Estates Inc. (2555 Erin Centre Blvd.) (letter #52, dated June 12, 2024)	<u>1</u> : Schedule 1	Boundary modification	1. Site should be included in the Central Erin Mills Major Node due to its location and development potential.	1. Node boundary modifications are not within the scope of the OP review.
122	GSAI on behalf of Stephen-Mitchell Realty Ltd, Whitehorn Investments Ltd & Lynrob Investments (1225 Dundas St E) (letters #54, dated June 28, 2024)	<u>1</u> : Schedule 1	MTSA Heights	1. Concerns with the exclusion of the site from the Dixie-Dundas Community Node. Lands along BRT and within delineated MTSA, logical extension of node, active development applications (OZ/OPA 22-20 W3, SP 22-131 W3), and included in the ongoing appeal of MOPA 141 for lands along the Dundas Street Corridor.	1. an increase in heights has been undertaken in addition to flexibility in additional heights.
123	GWD on behalf of 1212763 Ontario Ltd./1212765 Ontario Ltd. (The Azuria Group Inc.) re: 3150 and 3170 Golden Orchard Dr. (letter #59 dated June 28, 2024)	<u>1</u> : Schedule 8g	MTSA Heights	1. Concerns with the prescribed minimum and maximum building heights of 2-18 storeys. The heights do not reflect what can be ultimately achieved on site within a PMTSA. Request 8g be modified to reflect a maximum building height of 25 storeys on the subject site.	1. Additional height can be obtained thanks to the flexibility offered through policies related IZ units and non-residential uses where applicable.
124	Bousfields Inc. on behalf of Rangeview Landowners Group Inc. re: Rangeview Lands (letter #60 dated June 13, 2024)	<u>1</u> : Schedule 6	Follow up	1. Supportive of the current alignment of the 'future enhanced transit route' as shown on Schedule 6 proposed through the Rangeview and Lakeview Village lands as it will support the mixed-use development.	1. Noted.
125	Urban Strategies Inc. on behalf of Oxford Properties re: Square	<u>1</u> : Schedule 7 – Land Use Designations	Schedule update	1. The Legend includes an incorrect colour for the Downtown Mixed Use land use designation. Request that the colour be corrected.	1. Updated.

SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
	One Mall and surrounding lands in Downtown Core (letter #64 dated July 4, 2024)				
126	MPCT DIF 70 Park Street East LP ("Dream") on behalf of 70 Park Street East Inc. the owners of 70 Park Street East, 23, 25, 29 and 31 Helene Street North, and 53 Queen Street East ("70 Park"). (letter #69 dated December 5, 2024)	<u>1</u> : MTSA Mapping (Schedule 8n)	Change Height shown	1. For the entirety of 70 Park to be shown as an "active development application". Currently the southern portion of the site shows a maximum permitted height of 27 storeys	1. The active development application designation was temporary; this designation has been removed and the site has reverted back to the base height permissions. Heights will be as decided through the approval and OLT process.
127	Arcadis on behalf of Canadian Urban Limited ("Owner"), owners of 1475 Dundas Street East (letter #70 dated December 5, 2024)		Follow up	1. Once the floodplain and SPA are removed from the subject site, we would request that the subject site to be removed from the Dixie Employment Area and included in the Dixie-Dundas Community Node as designated Mixed Use with residential uses permitted.	1. Noted – a proper process to remove lands from the Employment Area in accordance with policies of the plan and the PPS must be followed once the SPA analysis is completed.
128	Urban Strategies Inc. on behalf of SmartCentres for 3155 Argenta Road and 1100 Burnhamthorpe Road (letter #73 dated December 6, 2024)		Schedule update	1. City Staff's proposed special site policies for 1100 Burnhamthorpe and SmartCentres Meadowvale proposed the removal of both sites in their entirety from the Employment Area structure and conversion to Community Area. The draft City Structure schedule released as part of agenda item 6.3 of the Planning and Development Committee meeting on December 9, 2024, does not show full conversion of the lands at SmartCentres Meadowvale and 1100 Burnhamthorpe and only shows a partial conversion of the lands from the Employment Area structure to Community Area. We kindly ask that the City's Official Plan Review team revise draft Schedule 1 – City Structure accordingly. 2. Remove site from Meadowvale Corporate Centre EA and add to Meadowvale NHD a. Revise Schedule 1 City Structure to reflect proposed policy changes 3. Remove site from Employment Area and add to Creditview Neighbourhood a. Revise Schedules 1 City Structure and Schedule 7 Land Use to reflect proposed policy changes	1. Updated. 2. Updated. 3. Updated.
129	GSAI on behalf of Mississauga Hurontario Hotel LP and Vrancor Master GP Inc. owners of 3670 Hurontario Street (letter #78 dated March 15 <sup>th</sup> , 2024)	<u>1</u> : Schedules 7-8 <u>2</u> : Map 12-2.3 <u>3</u> : Map 12-2.7	Redesignation	1. <u>Schedules 7 and 8</u> : The land use designations are not correct, Schedule 7 does not illustrate the Downtown Mixed Use designation category. 2. <u>Map 12-2.3</u> : The Proposed Pedestrian Connection on the subject lands or on Burnhamthorpe Road West is illustrated, we object to this as it is not clear to what the pedestrian connection will consist of and where exactly it will be located. 3. <u>Map 12-2.7</u> : Downtown Core A & B Street Frontage, Sussex Gate and Enfield Place, adjacent to the subject lands are illustrated to be B Streets while Hurontario Street and Burnhamthorpe Road West are illustrated to be A Streets. We object to all policies that stipulate access, entrance or built form restrictions to either an A or B Street. The development contemplates retention of both and consideration in the A & B Street	1. Updated. 2. Map 12-2.3 is only conceptual. More discussions will take place prior to determining final locations. 3. These policies establish a hierarchy that guides future development, a more refined assessment will be undertaken during the development stages in accordance with these policies.



SCHEDULES & MAPS					
#	Respondent	Section or Policy Reference	Nature of Comment	Comment	OP Staff Response
				policies needs to be had for existing circumstances and on a site-specific basis where the A & B Street policy requirements cannot be met.	
130	Zelinka Priamo Ltd. On behalf of Choice Properties REIT owners of various properties (letter #79 dated June 24, 2024)	<u>1</u> : Schedule 7	Natural Hazard	1. <u>Schedule 7</u> : the Natural Hazard Area boundary is identified within the lands at 7430 Pacific Circle, whereas the in-effect Official Plan does not identify the Natural Hazard Area overlay in proximity to these lands. We seek clarification as to the expansion of the Natural Hazard Area, and whether this is based on any specific background study or analysis.	1. The Natural hazard overlay is an illustration representing the flood risk as evaluated by the Conservation Authority. The new OP reflects the most up-to-date data provided by the Conservation Authority. It is intended to ensure safety and is to be further refined through the development review process.



## Partners:

**Glen Broll, MCIP, RPP****Colin Chung, MCIP, RPP****Jim Levac, MCIP, RPP****Jason Afonso, MCIP, RPP****Karen Bennett, MCIP, RPP***In Memoriam, Founding Partner:***Glen Schnarr**

March 14, 2024

GSAI File: 1009-003

Attention: Sharlene Bayovo, Project Lead  
Ben Philips, Project Manager

**RE: Mississauga Official Plan Review – Consolidated Draft Policies  
Queenscorp (Erin Mills) Inc.  
City File: CD.02-MIS  
4099 Erin Mills Parkway  
City of Mississauga, Region of Peel**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission regarding the City of Mississauga Official Plan (the “Official Plan”) review as an extension of our letter submitted to Planning and Development Committee on June 23, 2023, in response to Item 6.6: Information Report – All Wards (File: CD.02-MIS) on the June 26, 2023 Planning and Development Committee Agenda, and a second letter from GSAI dated July 31, 2023 in response to Mississauga Official Plan Review – Bundle 3 Draft Policies.

While we maintain our position on the matters outlined in the previous letters, we are pleased to make an additional submission with specific regard to the site addressed as 4099 Erin Mills Parkway (“the site”) on the draft consolidated Official Plan review.

As noted in our previous submissions, this site is currently subject to an active development application with the City (OZ OPA 22-25 W8) to permit a rezoning and Official Plan Amendment for a residential development with ground-floor non-residential programming. Notwithstanding the foregoing, we are reviewing the draft Official Plan and providing comments as if the application, in theory, were being reviewed against the draft OP. Meaning, we are reviewing the OP policies as if the policy framework presented in the draft was in effect as we feel this site exemplifies the fundamental issues with the draft OP policies related to infill applications within neighbourhoods. We note for staff that the OZ OPA application is still currently in process and has not been reviewed completely and subject to the benefit of a final staff Recommendation report to City PDC designated.

Our concerns with the draft policies are described below:

#### Affordable Housing

We have previously stated concerns with Chapter 5 related to Housing as written in the Official Plan. We acknowledge some changes from the City but continue to have concerns with Chapter 5, Housing Choices and Affordable Homes. Specifically, the policies presented in Section 5.2:



*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- social housing or other publicly funded housing; or*
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. Policy 5.2.4 can and should be modified as follows:

*To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include ~~a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units.~~ The City may consider a lower diversification of housing types and sizes ~~reduce these percentages~~ where development is providing:*

- social housing or other publicly funded housing; or*
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'.*

Should staff choose to include a percentage in this policy, we request that the policy be amended to encourage a reduced percentage of family-sized units to be provided.

Further, we have concerns with policy 5.2.5 and Table 5.1.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>



<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

We note it is important to consider that the Regional policies were written at the Regional level (a more ‘macro’ level than City-wide) and meant to be implemented as such. Unless the City has done the analysis to understand if this model is workable, we question if it is appropriate to require these percentages on a smaller scale (City). Additionally, we feel the specificity afforded in this policy in the OP is unnecessary as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing. As a reminder to staff, there are in-effect Provincial and Regional policy objectives which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. It is our opinion that the City should not be applying this requirement on a City-wide basis and rather, rely on the direction from the upper tier policy framework or in-effect legislation to utilize the Inclusionary Zoning Areas, or potentially others which may become applicable, as areas for the priority for housing affordability. The specificity of this policy appears to frustrate Provincial and Regional policy objectives of delivering a variety of housing options for current and future residents.

Conclusively, there are a number of and variety of policies scattered throughout the OP which reference the need for diversified housing stock. Further, this policy regime is handled through the Inclusionary Zoning tool already in place.

#### Land Use Designations

In terms of land uses, we provide comments related to the new Residential, Mixed Use and Neighbourhood policies. We provide feedback on both, since the application under review by staff is likely this development will be considered Residential for the purposes of the OP and is currently designated for Mixed Use.

Should the City (through the development application review process) deem the “Residential High Rise” designation the appropriate designation for these lands, we have concerns over the language found in the policies surrounding this designation (10.2.5.10) that states (Note: emphasis/underline added by the author):

*Lands designated Residential High-Rise will permit dwelling units in buildings that are above eight storeys, with a maximum height as specified in the Character Area or Special Site provisions. If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property*

We maintain our position from our previous submission – this presents an issue for infill applications or the redevelopment of presently underutilized sites, such as this site. In the absence of OP policies prescribing maximum heights, it appears the way to interpret this policy is to suggest the maximum permitted height on this site would effectively be one storey. This policy would be better worded to provide:



~~If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property.~~ Building heights in the Residential High Rise designation shall have a compatible massing and scale of built form that considers existing and planned context, intensification policies where applicable, and that considers the role of the subject site in the broader context of the City's hierarchy.

Should the City (through the development application review process) deem the "Residential Mid Rise" designation the appropriate designation for these lands, we have concerns over the language found in the designation that states (policy 10.2.5.8):

*Development on lands designated Mid-rise will ensure buildings:*

- *Have heights no greater than the width of the street right of way that they front onto*

We reiterate, this policy is restrictive and does not consider development that may be contextually appropriate. This policy has the potential to preclude sites (specifically infill sites) from developing to their full potential where it can be otherwise supported.

We continue to encourage the City to evaluate the use of policies which support logical and sensitive intensifications in neighbourhoods within the Official Plan. This approach can appropriately be structured around the City's hierarchy wherein policies would provide permissions for gentle intensification that remains contextually appropriate while still allowing the opportunity for development applications to respond to the policy intent. Applying specific performance standards such as a maximum building heights in the Official Plan undermines the utility of both the City's Zoning By-law and the Development Application review process. Rather, we submit that the policies found under 10.2.5.9 are appropriate as the language provides a degree of flexibility which requires that buildings meet certain policy design aspirations:

*Development on lands designated Residential Mid-Rise will ensure buildings:*

- a. provide for appropriate transition to surrounding low-rise properties;*
- b. maintain street proportion and open views of the sky from the public realm by stepping back building massing in accordance with this Plan's policies and applicable City guidelines; and*
- c. allow for daylight and privacy for units by providing appropriate facing distances, building heights, angular planes and step-backs*

The spirit and intent of the policies above are to manage impacts of new builds through preparation and analysis of technical reports. This is the very purpose of the application review process. Any language more restrictive than the above is a dangerous and short-sighted method of evaluating contextually appropriate development. This is contrary to capitalizing on underutilized sites in areas where gentle intensification (in this case) can be supported. This also fundamentally challenges upper tier objectives on delivering housing.

Presently, the site is designated as Mixed-Use under the City of Mississauga Official Plan and is situated within a Neighbourhood. In that respect, we reviewed the draft Official Plan policies in Chapter 14 Neighbourhoods. As previously submitted, Neighbourhoods are not isolated or fragmented areas from the rest of the City. The City actually encourages connections directly from/to Neighbourhoods from more





strategic growth areas, such as Nodes, throughout the City. The subject site is situated north of an existing Community Node, and south of an existing Major Node and Protected Major Transit Station Area.

We note policies 14.1.1.4 which read:

*The City will support the provision of a full range of housing options, built forms and compatible uses within neighbourhoods that:*

- a. Ensure housing forms are generally within the low-rise scale unless otherwise permitted by Character Area policies.*
- b. Promote a variety of residential built forms and arrangements that respond to the needs of the City's current and future residents and that prioritizes affordable and barrier free units.*
- c. Direct neighbourhood-appropriate higher density uses to locate within existing apartment sites and commercial centres, along Neighbourhood Arterials or as directed by Character Area policies.*
- d. Ensure development provides appropriate transitions in height, built form and density to the surrounding lands.*
- e. Protect existing local services that support complete communities, including compatible small-scale retail and service uses, in accordance with permitted uses in this Plan.*

While the introductory sentence of this policy provides promising language in supporting flexibility, the fall out policies for implementation fundamentally challenge the intent of 14.1.1.4. Interestingly, while the introductory sentence provides language for a full range of housing types (which are compatible), policy a) continues to read that housing forms should generally be within the low-rise scale. While we acknowledge the inclusion of the word “generally”, policy a) appears to not support the intent of 14.1.1.4 which is to explore the provision of a full range of housing options. By extension, policy a) also frustrates the intent of policy b) by being inherently restrictive on densities and built forms. The language provided in policy c), while an improvement over policies a) and b) could be modified:

- c. ~~Direct~~ Encourage neighbourhood-appropriate higher density uses to locate within existing apartment sites and commercial centres, or other areas deemed appropriate through technical studies, ideally situated along Neighbourhood Arterials or as directed by Character Area policies.*

This revision continues to promote or encourage neighbourhood-appropriate development in areas with more strategic locations and where gentle intensification is appropriate. We believe this policy should be further revised to also include lands along “Corridors” and sites in close proximity to open spaces, commercial uses (i.e., plazas, malls) and other uses that support and are supported by, residential land uses.

We submit that policy d) is entirely appropriate and provides language which helps to guide development that is both logical in supporting best land use planning practices as well as affording staff discretion to evaluate the ‘appropriateness’ of development in the context of an existing or built out neighbourhood. Policy e) suggests certain uses require protection but the City hasn’t provided any rationale on whether these are uses subject to market conditions and whether these uses are sustainable and thus may be more appropriately located elsewhere or replaced with other local services. This policy seems to recognize existing conditions but the broader spirit of the policies for the Residential areas don’t seem to identify stand-alone local services as permitted thus creating a policy conflict.



We also have a concern with policy 14.1.1.6. We feel it should be modified as follows which in our opinion, would bring it better into conformity with overarching objectives and goals surrounding housing affordability (Note: emphasis/underline added by the author indicating new content):

*Intensification within Neighbourhoods may be considered where the proposed development is compatible in built form and scale to surrounding development, enhances the existing or planned development and is generally consistent with the policies of this Plan.*

We propose this modification on the basis that some of the policies in the Mississauga Official Plan are inherently restrictive and do not afford flexibility to evaluate sites on a case-by-case basis. This type of firm language (“...consistent with the policies of the official plan”) should be softened in order to allow proponents to explore the optimization of lands for uses or features beyond that which is considered under the Official Plan without overly restrictive policies. Conversely, the policies in 14.1.1.7 are more appropriate as it affords flexibility and the opportunity to evaluate the appropriateness of a development on a site and area specific basis:

*Development will be sensitive to the existing and planned context and will include appropriate transitions in use, built form, density and scale.*

Chapter 14.1.2 of the Mississauga Official Plan speaks to Mixed Use designations in Neighbourhoods. While we agree in principle that residential intensification will take place in Neighbourhoods through infilling (14.1.2.1), certain policies found in 14.1.2.2 are concerning:

*Within Neighbourhood Character Areas, development of Mixed Use sites that are over 1 ha in size will:*

- a. maintain the same amount of commercial floor space;*
- c. include a mix of low and mid-rise buildings with maximum heights not exceeding the width of the street right-of-way that they front onto, up to a maximum of 8 storeys*

Policy a) is overly cautious and presents an intolerant and rigid approach to strategic land use planning. Requiring a 1:1 replacement of commercial floor space is an extreme response to redevelopment of mixed-use sites or plaza sites. We realize that non-residential gross floor area is an important part of considering community needs to serve existing and planned neighbourhoods however, requiring a 1:1 replacement ratio can be detrimental to the optimization of available lands. The replacement requirement is better evaluated through a market study and through an understanding of access to immediate and surrounding commercial floor space as well as market conditions and trends. The policy should either be removed in its entirety or reworded to provide flexibility:

- a. maintain ~~the same~~ an adequate amount of commercial floor space if deemed appropriate through a market study;*

We understand the intent of this policy and acknowledge that a mix of uses is required to support complete communities but there are more pragmatic and appropriate solutions to replacement GFA for non-residential uses.

Further, as briefly touched on above, policy c). related to building heights and ROW widths is problematic. In our opinion, the restriction of building predicated on its relationship to the width of the public Right-of-Way (‘ROW’) on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location which could be contrary to the policies



directing growth to certain areas and those outlined in the City's hierarchy. This will challenge the delivery of high-quality, refined, efficient, compact, transit supportive development in targeted locations and will hinder the development potential of lands.

Once again, there are policies in the Official Plan that are more suitable to regulate building heights within Neighbourhoods – particularly in section 4.1.3 Residential. Requiring a building to match or be lesser than a ROW width is a stretch and does offer the intended balance between urban design (a building's relationship with a street) and appropriate heights. If the City adopts this policy as is, it presents a dangerous precedent for development.

We remind staff that flexibility in crafting land use policies over a large planning horizon need to be structured to be pragmatic as they respond to a living City with a constantly changing landscape.

Thank you for the opportunity to provide comments on the City's Official Plan Review. We would be happy to discuss our comments with staff, if necessary.

Sincerely,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP  
Managing Partner

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March 14, 2024

**BY EMAIL [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca) & REGULAR MAIL**

City of Mississauga  
Planning & Development Committee  
300 City Centre Drive, 3<sup>rd</sup> Floor  
Mississauga, Ontario  
L5B 3C1

Attn: Councillor C. Fonseca, Chair, Planning & Development Committee

**Re: March 18, 2024 Planning and Development Committee Agenda  
Item 6.4 – ‘Proposed Mississauga Official Plan 2051’**

**Submission on behalf of Orlando Corporation - ‘Heartland Business Community’  
Proposed Gateway Corporate Centre Employment Area - Hurontario Corridor**

**City of Mississauga File CD.02-MIS  
Our File No. 1421**

We are the planners of record writing on behalf of Orlando Corporation (‘Orlando’). We appreciate the opportunity to provide stakeholder input regarding ‘Proposed Mississauga Official Plan 2051’ (‘MOP 2051’) in terms of Orlando’s properties located within the proposed ‘Gateway Corporate Centre Employment Area’, along the Hurontario Corridor.

Orlando consistently participates in the city’s planning programs as represented by numerous submissions filed with the city in terms of their lands located in the proposed ‘Gateway Corporate Centre Employment Area’ and as further reflected in prior ‘OMB’ orders and settlements concerning past and the current MOP and the City’s Comprehensive Zoning By-law No. 0225-2007, as amended.

As a Statutory Public Meeting, this submission is provided per the latest version of MOP 2051, and we request that our comments are fully considered in an effort to resolve all issues raised herein, prior to Council adoption of the final MOP 2051, proposed in Q2-2024.

POUND & STEWART ASSOCIATES LIMITED

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## 'Heartland Business Community' Planning Submission – January 9, 2024

The supply of 'Office' space (along with 'Office' designated lands) greatly exceeds demand. Office workplace locations are now varied or hybrid, and this has resulted in high 'Office' vacancy rates and the underutilization of office buildings and lands. Public planning policies and regulations governing land use must consider office market factors and conditions, in creating MOP 2051 policies per the provincial planning framework.

As it stands, MOP 2051 currently includes land use planning policies that fail to address the new reality of the office workplace, technologically accelerated via the Pandemic. It is in the public interest that those policies undergo re-evaluation to assess why prior planned visions have not occurred, and also consider options going forward.

MOP 2051 is to be supported by a pending *'Employment Land, Office and Retail Market Analysis' ('ELORMA')* that informs land use planning, assessing short, medium and long-term market factors and conditions, to support land use policies and regulations that govern the planned and business functions of employment lands.

Our January 9, 2024 Planning Submission provides a way to achieve productive land use, for the 'Gateway Corporate Centre Employment Area'. Therefore, we request that the City re-assess its current 'Office' land use policies and regulations and consider implementing the proposed 'Heartland' Concept Plan (Figure 3 from Jan. 2024 Report attached) which is designed to:

- Eliminate extensive vacant land areas and/or underutilized surface parking areas by permitting functional employment uses, including advanced manufacturing, assembly, processing, warehousing and distribution (logistics) uses that will contribute to the City's employment opportunities and job base, while supporting the upgraded public transit services located along Hurontario - Hazel McCallion LRT;
- Fulfill *'Energy Conservation, Air Quality and Climate Change'* policy objectives, among others, of the Growth Plan, Provincial Policy Statement and pending Provincial Planning Statement, through the generation of well-located advanced manufacturing, warehousing and distribution (logistics) uses that will serve market demand by way of complementary and/or integrated land use pattern;





- Advance regional and city business realty tax rates, planning fees, building permit fees, and development charge requirements;
- Advance construction jobs initially, followed by long-term advanced manufacturing, assembly, processing, warehousing and distribution jobs.

As Canada's premier builder of commercial and industrial properties Orlando looks forward to implementing the proposed 'Heartland Concept Plan' within this *Strategic Growth Area* which will otherwise continue to stagnate.

## 'MOPA 143' and 'MOPA 144'

MOPAs 143 and 144 concern the city's in-effect Official Plan and MOP 2051 sets out to incorporate some elements of MOPAs 143 and 144, however it appears that the Region of Peel has yet to approve them, among others.

Notwithstanding, on August 4, 2022 our letter submission indicated the proposed MOPAs failed to incorporate a November 15, 2021 'OLT' (Case No. PL200251) settlement achieved with the City regarding implementation of 'Gateway Corporate Centre Character Area' Official Plan policies per Zoning By-law No. 0121-2020.

This settlement built on our client's earlier February 2, 2017 'OMB' Minutes of Settlement (Case No. PL141198) with the City concerning 'Gateway Corporate Centre Character Area' Official Plan policies and the unique locational scale and context of Orlando's affected properties, where these MOPAs:

- propose different minimum *Building Heights* than that approved through the November 21, 2021 'OLT' Order. Certain blocks or properties are to be identified with a *minimum Building Heights of 3 storeys*, whereas a *minimum Building Height of 2 storeys* is permitted per approved Zoning By-law 0121-2020.
- propose different *minimum Density ('FSI')* requirements than that approved per the approved Zoning By-law 0121-2020. The minimum MTSA – FSI density per the City's Table 5-2 is described as 1.0 FSI, whereas the recently approved Zoning By-law provides for lower FSI minimums, while the 1.0 FSI is a long-term target, not to be applied to individual building applications – per draft policy 5.7.3.3.





- proposed policy 5.7.6 'Urban Design' reads;

*'Developments will: a. minimize surface parking'...*

Minimizing surface parking is reasonable in support of intensification and site utilization. Applying a rigid policy removes flexibility in site designs per site scale and context, along with tenant requirements. Flexibility is required where surface parking provides for better user functionality and access. Therefore, it is recommended that the flexibility of the existing MOP policy 9.2.1.37 remain, where, *'Development is encouraged minimize the use of surface parking...'*

Given the complexity of office demand and supply, MOPA 2051 policies should not compromise any future incremental development in a Protected Major Transit Station Area ('PMTSA'), for example, where phasing does not achieve the 1.0 FSI, but intensifies FSI. It is not fully clear how this will be practically applied, particularly in terms of future zoning.

## **MOPA 25 Settlement on Fine-Grained Road Network Policies to be Acknowledged**

MOP 2051 includes and applies '*fine grain street pattern*' policies to lands located within a *Protected MTSA*, recognized as being part of a *Strategic Growth Areas* as follows:

### **7.3 Complete Streets**

#### **7.3.4 Street Classification System**

**7.3.4.5** In *Strategic Growth Areas*, transportation decisions will support the creation of a fine grain street pattern, low traffic speeds, a mix of travel modes, and attention to the design of the public realm.

### **8.2 Urban Form**

#### **8.3 City Pattern**

**8.3.7** Existing large blocks, within *Strategic Growth Areas* will be reconfigured to incorporate a fine-grained block *structure* with public roads and on-street parking to support at grade uses.

### **8.4 Public Realm**

#### **8.4.1. Streets, Blocks and Streetscape**

**8.4.1.6** The improvement of existing streets and the design of new streets should enhance connectivity by:





- a. developing a fine-grained system of roads;
- b. using short streets and small blocks as much as possible, to encourage pedestrian movement;
- c. avoiding street closures; and
- d. minimizing cul-de-sac and dead end streets.

Orlando sought and achieved a Settlement in February 2017 with the City ('OPA 25') as it relates to the city's policies on the development of a fine-grained road network or system.

It was determined that new public roads or streets were not required within the Orlando's lands given the scale and impact on block size, as well as other limitations. It was also determined that where and if needed private roads with public easements would meet the City's goals of providing multiple routing options for all modes within the area, improving connectivity and manage the number of access locations.

It is noted that proposed MOP 2051 policy 7.3.4.7 reads; *"Future additions to the street network will be public streets. Public easements will be required for cases where a private street is considered. An appropriate terminus is required for the maintenance and operations where private street connects with a public street."* As noted above, this policy needs to be carefully applied, particularly where projects will be functionally served by private driveway systems, independent of public streets and/or private streets with public easements.

As a result of the prior Settlement noted above, it is expected that any reference to fine grain road policies in MOP 2051, as per proposed city-wide policies 7.3.4.5, 8.3.7 and 8.4.1.6, and any others, would not specifically apply or be mandatory, and that the policies would be taken into consideration as part of *Protected MTSA*, development applications process in consideration of the needs of the applicant and the planned function of the land use.

### **Clarification sought on the 26 m – 35 m as a new Right-of-Way Width**

MOP 2051 includes Schedule 6 Designated Right-of-Way Widths which introduces 26 m – 35 m as a new Right-of-Way Width.





We seek clarification as to how this new standard was determined, and how and where it may be applied in the future as it relates to local and minor collector roads as roads classifications located in employment areas. For example, is this a generic representation of a city planning objective or does it apply to unique circumstances or specific lands or roads within the city?

### **Need for a 'Strategic Goods Movement Network' Schedule**

While the Region of Peel Official Plan includes a 'Strategic Goods Movement Network' Figure 16, the current version of MOP 2051 does not.

It is recommended that there is importance and economic development value in providing a 'Strategic Goods Movement Network' Schedule within MOP 2051, illustrating and identifying the existing and proposed 'Strategic Goods Movement Network', inclusive of 'Primary Truck Routes' and 'Connector Truck Routes' within, for example, the Hurontario Corridor connecting to Highway 401, among others.

### **The Future of 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours**

MOP 2051 includes Schedule 7 and a related catalogue of 14 sub-Schedules 7A thru 7N where the 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours are included on each of these Schedules.

Notwithstanding, the MOP 2051 Figure 4.17 includes the 1996 NEP/2000 NEF Composite Noise Contours, and in terms of MOP 2051. It is noted that *"The figures and associated captions have been provided for informational and illustration purposes only and are not policy"*.

As well, the Region of Peel Official Plan includes 'Figure 15 Aircraft Noise Exposure Composite Contours', where;

*"Figures are not part of the Region or Peel Official Plan and are provide for illustrative or informational purposes only and to show categories of areas typically subject to specific policies of the Plan. Information shown on figures may be changed or updated from time to time, without requiring an amendment to this plan."* ROP page 4





Given that the City is maturing in terms of urban development, the original role and purpose of the 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours is redundant and dated, as both the Region's and the City's Official Plans references the contours for informational purposes only, even though they appear on the MOPA 2051 Schedule 7 and related Schedules.

As well, Transport Canada is reviewing the current 1996 NEP/2000 NEF Composite Noise contour model (which measures perceived and subjective levels of annoyance) and is considering the aircraft noise model used by the FAA, which relies on a truer dBa methodology for noise measurements. Transport Canada's review will be completed well within the horizon of MOP 2051.

Therefore, we request that the 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours be removed from Schedule 7 and a related catalogue of 14 sub-Schedules 7A thru 7N and only remain in MOP 2051 for informational purposes as per Figure 4.17.

### **Urban Design Criteria should be reasonably applied to Employment Areas**

MOP 2051 contains numerous policies regarding urban design criteria and implementation should be reasonably applied to Employment Areas so as to not unreasonably or negatively impact the planned function, cost and delivery of employment lands and buildings. Many of these policies are included in Chapter 8 Well Designed Healthy Communities. Proposed policies that affect urban form, city pattern, public realm, etc. need to be carefully applied as they relate to the planned and business functions of employment lands.

As an example, MOP 2051 policy 8.4.1.8 reads,

*"Outdoor storage will not be located adjacent to, or be visible from city boundaries, the public realm or sensitive land uses by incorporating the use of appropriate setbacks, screening, landscaping and buffering."*

Other policies of MOP 2051 eliminate 'Outdoor storage' absolutely, excluding the ability to incorporate the use of *appropriate setbacks, screening, landscaping and buffering*. It is important that lands designated 'Business Employment' include 'Outdoor storage' as a permitted use, accessory to the main permitted use, i.e. manufacturing. Accessory 'Outdoor storage' would be permitted where *the use of appropriate setbacks, screening, landscaping and buffering* can be successfully incorporated, and that trucks and trailers, associated with the main permitted use as planned function, are not deemed 'Outdoor storage'.

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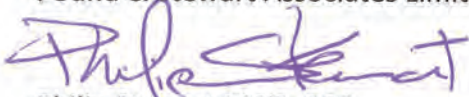
Overly restrictive Official Plan policies and rigorous zoning regulations should be avoided in light of the principle that a building's overall function will determine its built form and productive business employment requirements.

In conclusion, we would also appreciate our firm being placed on the City's mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related Items, and any Council decision or actions on the above captioned matter. Please note this submission does not preclude any future submissions regarding this matter.

Thank-you in advance for your co-operation, and please advise if any additional information is required to further support our submission at your earliest convenience.

Yours truly,

Pound & Stewart Associates Limited



Philip Stewart MCIP, RPP

/la 1421ltr\_Proposed MOP 2051\_March.14.2024

Attachment: 'Heartland' Concept Plan (Figure 3 from Jan. 2024 Report)

cc. Ms. D. Rusnov, Office of the City Clerk, City of Mississauga  
[Diana.Rusnov@mississauga.ca](mailto:Diana.Rusnov@mississauga.ca)

cc. Mr. A. Whittemore, Commissioner of Planning & Building, City of Mississauga  
[Andrew.Whittemore@mississauga.ca](mailto:Andrew.Whittemore@mississauga.ca)

cc. Mr. J. Bevan, Director, Planning Strategies, City of Mississauga  
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cc. Mr. B. Phillips, 'MOP 2051' Planner, Planning & Building Department, City of Mississauga  
[Ben.Phillips@mississauga.ca](mailto:Ben.Phillips@mississauga.ca)

cc. Ms. S. Bayovo, 'MOP 2051' Planner, Planning & Building Department, City of Mississauga  
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cc. Ms. T. Buonpensiero, Chief Planner, Region of Peel  
[tara.buonpensiero@peelregion.ca](mailto:tara.buonpensiero@peelregion.ca)

cc. Mr. L. Longo, Aird & Berlis

cc. Client

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## 6.5





## MEMORANDUM

**TO:**

Planning and Development Committee  
**Attention:** Sharleen Bayovo and Ben Phillips  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON, L5B 3C1

**FROM:**

Kristie Ellis, Associate  
Stuart Anderson, Senior Associate

**PROJECT:**

7189-21  
Brightwater Redevelopment

**DATE:**

March 13, 2024

**RE: PROPOSED CITY OF MISSISSAUGA OFFICIAL PLAN – TRANSPORTATION CONTEXT REVIEW**

### 1.0 INTRODUCTION

BA Group are the transportation consultants for the Port Credit West Village Partners (PCWVP), who are the owners of the properties known as 70 Mississauga Road South and 181 Lakeshore Road West in the City of Mississauga (the “Brightwater Site”).

We are writing to provide comments related to the draft Mississauga Official Plan 2051 (the “draft OP”), which is now available in full (dated February 2024).

This letter identifies several matters that relate to the Brightwater Site on the following draft OP Schedules:

- Long Term Road Network
- Long Term Transit Network
- Long Term Cycling Routes

Excerpts from the in-force and draft OPs have been included in this memorandum as exhibits to note and compare potential transportation-related changes within the vicinity of the Site.

## 2.0 LONG TERM ROAD NETWORK

The in-force OP identifies several Future Minor Collector roads within the Brightwater Site, as shown in Exhibit 1. While the road locations and classification (Minor Collector) on and adjacent to the Brightwater Site in the OP are consistent with the draft OP (Exhibit 2 – Schedule 3), there appears to be inconsistency with the land use designation for the Brightwater Site. The Future Minor Collector roads shown in the draft OP for the Brightwater Site appear to be categorized as “Strategic Growth” roads despite the fact that the Brightwater Lands are classified elsewhere within the draft OP as a “Neighbourhood” (including Schedule 1).

We also note that Mississauga Road South is shown as a Future Minor Collector road link in the draft OP schedule despite the fact it is an existing road.

Exhibit 1: In Force OP – Long Term Road Network (Schedule 5)

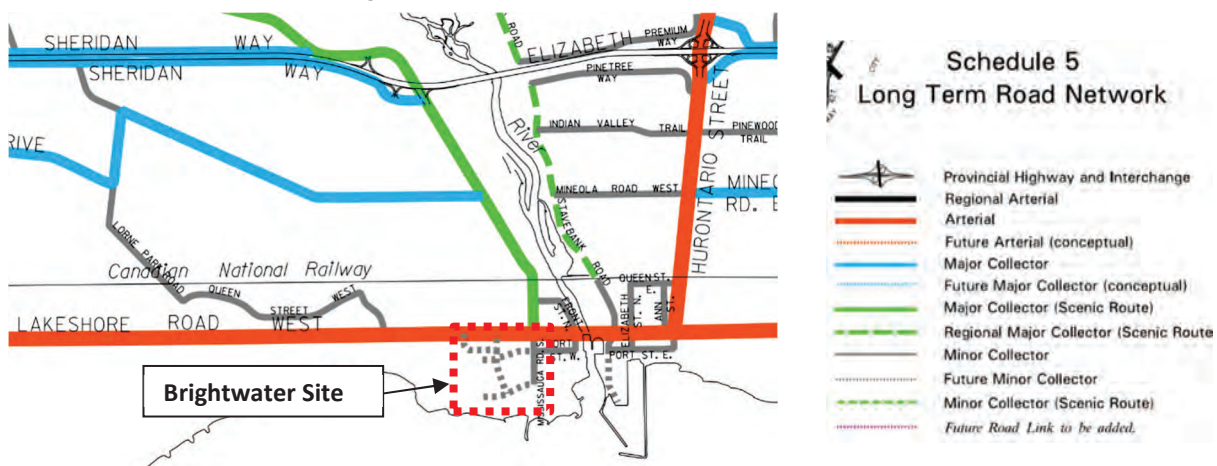
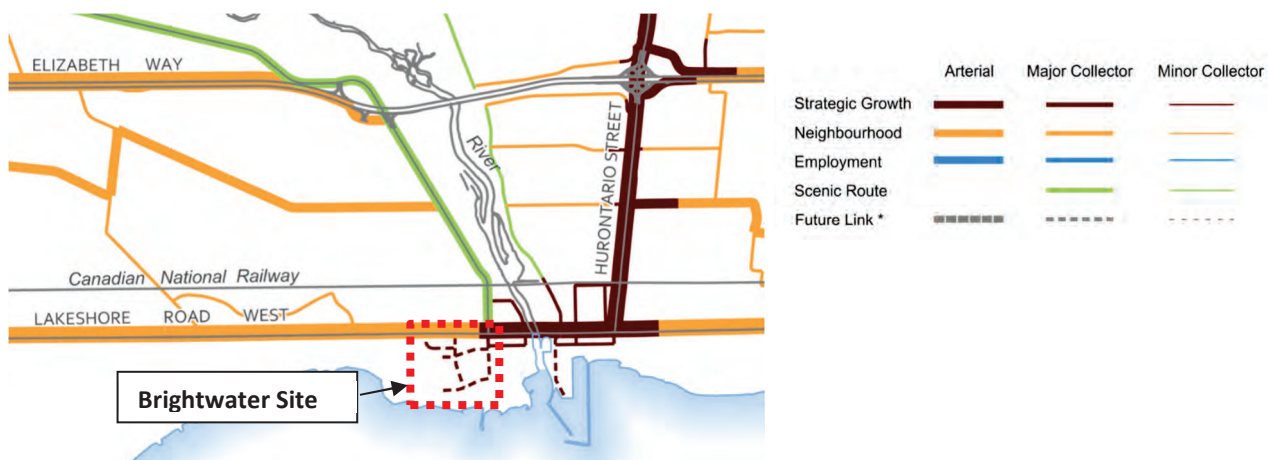


Exhibit 2: Draft OP – Long Term Road Network (Schedule 3)





### 3.0 LONG TERM TRANSIT NETWORK

The draft OP's long term transit network, within the vicinity of the Site, has remained consistent with that shown in the in-force OP (Exhibit 3 and Exhibit 4).

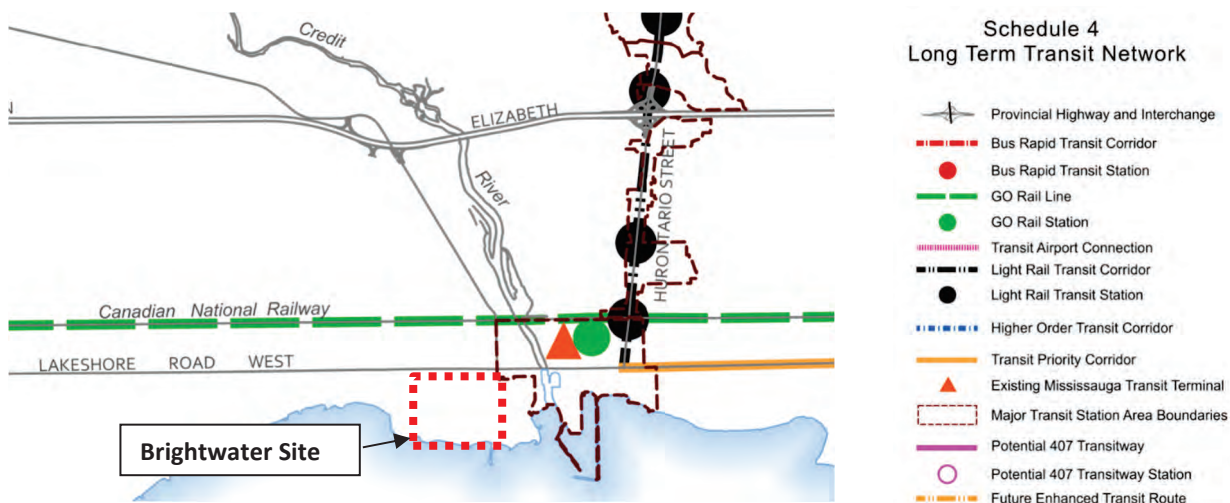
The draft OP does not appear to include the recommended transit network solution outlined in the 2019 Lakeshore Connecting Communities Transportation Master Plan, which includes a Lakeshore Express Bus Rapid Transit (BRT) route in the short term and a streetcar extension along Lakeshore Road West to Mississauga in the longer term (The "Waterfront West LRT" Transit route is shown on the Province's Regional Transportation Plan running from Toronto to west of the Credit River). The new draft OP also does not include the proposed transit hub on the Brightwater Site that was shown in the 2019 Lakeshore Connecting Communities Transportation Master Plan.

Given previous City and Provincial direction for Lakeshore Road, and with the categories included in the legend, we would have expected Lakeshore Road west of Hurontario Street to have been shown in the draft OP as a "Future Enhanced Transit Route" or a "Transit Priority Corridor".

Exhibit 3: In Force OP – Long Term Transit Network (Schedule 6)



Exhibit 4: Draft OP – Long Term Transit Network (Schedule 4)



## 4.0 LONG TERM CYCLING ROUTE

The long term cycling routes on the Brightwater Site are generally consistent between the in-force and draft OP (as shown in Exhibit 5 and Exhibit 6) and include:

- a primary off-road route designated along the south end of the Site – representing the Waterfront Trail; and
- a primary on-road route shown on Lakeshore Road.

The draft OP has designated additional (off Site) cycling routes within the vicinity of the Site including:

- a primary on-road/ boulevard route along Mississauga Road (from the QEW Highway to Lakeshore Road West);
- an off-road route along the Credit River (from the QEW Highway to the CN Railway); and
- a southern crossing of the Credit River (in proximity to the CN Railway).

The draft OP has not noted the planned cycling routes within the Brightwater Site (connecting Lakeshore Road West to the Waterfront Trail) including the primary on-road / boulevard route on Mississauga Road South from Lakeshore Road to the Waterfront Trail (built in 2023) and the off-road route proposed along the western edge of the Site, and the on-road bicycle facilities on The Brightwater Boulevard running north-south through the centre of the site.

Exhibit 5: In Force OP – Long Term Cycling Routes (Schedule 7)



Exhibit 6: Draft OP – Long Term Cycling Routes (Schedule 5)



## 5.0 CONCLUSION

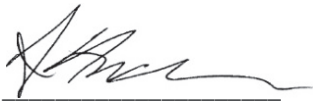
The City of Mississauga's draft Official Plan 2051 represents a positive step towards shaping a sustainable, diverse, and transit-oriented urban environment.

With regard to the Brightwater Site, there appear to be some transportation-related inconsistencies within the draft Official Plan Schedules that we believe require further review and refinement including:

1. Modifications to the long-term road network on Schedule 3
2. Identification of the Lakeshore West transit corridor and new transit hub on Schedule 4
3. Inclusion of primary on and off-road cycling routes within and adjacent to the Brightwater Site on Schedule 5

Addressing these issues will support the City's long-term transportation policies and ensure key elements of the transportation network are incorporated into future development.

Thank you for considering our comments.



Stuart Anderson, P.Eng.

Senior Associate



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March 14, 2024

**BY EMAIL [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca) & REGULAR MAIL**

City of Mississauga  
Planning & Development Committee  
300 City Centre Drive, 3<sup>rd</sup> Floor  
Mississauga, Ontario  
L5B 3C1

Attn: Councillor C. Fonseca, Chair, Planning & Development Committee

**Re: March 18, 2024 Planning and Development Committee Agenda  
Item 6.4 – ‘Proposed Mississauga Official Plan 2051’**

**Submission on behalf of Hensall Landholdings c/o Cooksville Steel Ltd.  
City of Mississauga File CD.02-MIS  
Our File No. 1812**

We are writing on behalf of Hensall Landholdings c/o Cooksville Steel Ltd., the registered landowner of 510 Hensall Circle (‘subject property’) as the Planners of Record.

Thank you for the opportunity to provide input regarding ‘Proposed Mississauga Official Plan 2051’ (‘MOP 2051’) in terms of our client’s property which is located within the Grenville Protected Major Transit Station Area (‘MTSA’). Our comments relate to the subject property, and its area specific planning context, as part of the ‘Dundas Street Corridor’. As the Planners of Record, we have consistently participated in the city’s ‘Dundas Connects’ program on behalf of our client.

As a Statutory Public Meeting, this submission is provided per the latest version of MOP 2051, and we request that our comments are fully considered in an effort to resolve all issues raised herein, prior to Council adoption of the final MOP 2051, proposed in Q2-2024.

POUND & STEWART ASSOCIATES LIMITED

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**Schedule 8g Protected Major Transit Station Area (PMTSA) Land Use Schedule Request**

Prior to MOP 2051 the Ministry of Municipal Affairs and Housing and the Region of Peel established that the subject property is not located within an 'Employment Area', effectively subsumed within the boundary of the 'Cooksville Neighbourhood (East)'. MOP 2051 City Structure status correctly depicts this on Schedule 1, City Structure, Schedule 4, Long Term Transit Network and Schedule 7 and 7K, Land Use Designations. This City Structure status is also correctly depicted on Map 11-1 Dundas Street Intensification Corridor, Map 14-1: Neighbourhood Character Areas and Map 15-1: Employment Areas and Map 15-5 Dixie Employment Area.

In review of MOP 2051 we have determined that Schedule 8g Protected Major Transit Station Area (PMTSA) - Land Use Schedule needs to be modified as the subject property appears to be located within the boundary of the 'Dixie Employment Area' and this is incorrect. Therefore, we request that this Schedule be revised to be consistent with the Schedules 1, 4 and 7 and 7k, among others, as noted above.

**Request to apply the 'Mixed Use Limited' land use designation on Schedule 7**

In addition, given the value, importance and flexibility associated with the MOP 2051 'Mixed Use Limited' land use designation, as identified for the subject property on the Schedule 8g Protected Major Transit Station Area (PMTSA) - Land Use Schedule, we request that it be placed on Schedule 7 and the supporting sub-set Schedule, as it does not currently appear as such. Without this modification the subject property appears to remain designated 'Business Employment'.

**Proposed Policies concerning Fine-Grained Block Structure and Public Roads**

MOP 2051 Section 11.12 Dundas Street Corridor includes Map – 11-3 titled, 'Conceptual Road network expansion within and adjacent to Dundas Street corridor west of Hurontario Street'. The locations referenced in the title of this Map, and its corollary Map 11-2 are reversed.

Notwithstanding we are concerned that the Map 11-3 prematurely illustrates a 'Proposed Public Road' to be located east-west across the subject property. At the time of the future redevelopment of the subject property, it will be important to consider the context and character of the proposed development or redevelopment to assess if a public street or road is functionally required at that time.

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It is further noted that MOP 2051 includes and applies 'fine grain street pattern' policies to lands located within a *Protected MTSA*, recognized as being part of a *Strategic Growth Areas* as follows:

**7.3 Complete Streets****7.3.4 Street Classification System**

**7.3.4.5** In *Strategic Growth Areas*, transportation decisions will support the creation of a fine grain street pattern, low traffic speeds, a mix of travel modes, and attention to the design of the public realm.

**8.2 Urban Form****8.3 City Pattern**

**8.3.7** Existing large blocks, within *Strategic Growth Areas* will be reconfigured to incorporate a fine-grained block structure with public roads and on-street parking to support at grade uses.

**8.4 Public Realm****8.4.1. Streets, Blocks and Streetscape**

**8.4.1.6** The improvement of existing streets and the design of new streets should enhance connectivity by:

- a. developing a fine-grained system of roads;
- b. using short streets and small blocks as much as possible, to encourage pedestrian movement;
- c. avoiding street closures; and
- d. minimizing cul-de-sac and dead end streets.

In addition, MOP 2051 policy **7.3.4.7** reads;

"Future additions to the street network will be public streets. Public easements will be required for cases where a private street is considered. An appropriate terminus is required for the maintenance and operations where private street connects with a public street."

As recommended above, these policies need to be carefully applied, as certain projects have the ability and basis to be functionally served by private driveway systems, independent of public streets and/or private streets with public easements.





It is expected that any reference to fine grain road policies in MOP 2051, as per proposed city-wide policies 7.3.4.5, 8.3.7 and 8.4.1.6, and any others, would be flexibly applied and not mandatory, where the policies would be taken into consideration as part of the processing of future development applications located within a *Protected MTSA*.

## **Proposed Modification to and MOP 2051 Dixie Employment Area policy 15.10.2.2**

Proposed MOP 2051 policy 15.10 Dixie, 15.10.2 Land Use reads:

**"15.10.2.2** Notwithstanding the Business Employment policies of this Plan, existing industrial uses that require extensive outdoor processing and storage will be permitted, and may expand, except where adjacent to residentially designated lands."

It is recommended that this policy be modified to also include 'Mixed Use Limited' designated lands as well.

**"15.10.2.2** Notwithstanding the Business Employment policies of this Plan, existing industrial uses that require extensive outdoor processing and storage will be permitted, and may expand, except where adjacent to residentially designated lands, and lands designated Mixed Use Limited." (Underline added)

In conclusion, we would also appreciate our firm being placed on the City's mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related Items, and any Council decision or actions on the above captioned matter. Please note this submission does not preclude any future submissions regarding this matter.

Thank-you in advance for your co-operation, and please advise if any additional information is required to further support our submission at your earliest convenience.

Yours truly,  
Pound & Stewart Associates Limited



Philip Stewart MCIP, RPP

/la 1812ltr\_Proposed MOP 2051\_March.14.2024

POUND & STEWART ASSOCIATES LIMITED



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cc. Ms. D. Rusnov, Office of the City Clerk, City of Mississauga  
[Diana.Rusnov@mississauga.ca](mailto:Diana.Rusnov@mississauga.ca)

cc. Mr. A. Whittemore, Commissioner of Planning & Building, City of Mississauga  
[Andrew.Whittemore@mississauga.ca](mailto:Andrew.Whittemore@mississauga.ca)

cc. Mr. J. Bevan, Director, Planning Strategies, City of Mississauga  
[Jason.Bevan@mississauga.ca](mailto:Jason.Bevan@mississauga.ca)

cc. Mr. B. Phillips, 'MOP 2051' Planner, Planning & Building Department, City of Mississauga  
[Ben.Phillips@mississauga.ca](mailto:Ben.Phillips@mississauga.ca)

cc. Ms. S. Bayovo, 'MOP 2051' Planner, Planning & Building Department, City of Mississauga  
[Sharleen.Bayovo@mississauga.ca](mailto:Sharleen.Bayovo@mississauga.ca)

cc. Ms. C. Peters, 'MOP 2051' Planner, Planning & Building Department, City of Mississauga  
[Cheryl.Peters@mississauga.ca](mailto:Cheryl.Peters@mississauga.ca)

cc. Ms. T. Buonpensiero, Chief Planner, Region of Peel  
[tara.buonpensiero@peelregion.ca](mailto:tara.buonpensiero@peelregion.ca)

cc. Client

POUND & STEWART ASSOCIATES LIMITED

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## Partners:

Glen Broll, MCIP, RPP

Colin Chung, MCIP, RPP

Jim Levac, MCIP, RPP

Jason Afonso, MCIP, RPP

Karen Bennett, MCIP, RPP

In Memoriam, Founding Partner:

Glen Schnarr

March 14, 2024

GSAI File: 1569-001

Attention: Ben Philips, Project Manager

**RE: Mississauga Official Plan Review – Consolidated Draft**  
**City File: CD.02-MIS**  
**69 & 117 John Street**  
**City of Mississauga, Region of Peel**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission regarding the City of Mississauga Official Plan (the “Official Plan”) draft consolidation with specific regard to the site addressed as 117 & 69 John Street (“the site”).

We note for staff that GSAI, on behalf of the Owner, attended a DARC Application meeting in 2023. We are currently in the process of a resubmission to DARC and anticipate it will be filed in the short term.

We note for staff that this site is located within the Cooksville PMTSA (Chapter 11), the Cooksville Urban Growth Centre (Chapter 12) and the Cooksville Neighbourhood.

Our comments on the draft, consolidated MOP related to this site are focused on Chapter 5 – Housing, Chapter 8: Well Designed Healthy Communities, Chapter 10 – Land Use Designations, Chapter 11 – Transit Communities, Chapter 12 – Urban Growth Centres and Chapter 14 – Neighbourhoods.

We have major concerns with Chapter 5 related to Housing as written in the Official Plan. We acknowledge some changes from the City but continue to have concerns with Chapter 5, Housing Choices and Affordable Homes. Specifically, the policies presented in Section 5.2:

*’5.2.2. Phased development will have a range and mix of housing types for each development phase.’*

*’5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*





- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs’*

While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. Policy 5.2.4 could be modified as follows:

*To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a ~~minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units.~~ The City may consider a lower diversification of housing types and sizes ~~reduce these percentages~~ where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs’.*

Should staff choose to include a percentage in this policy, we request that the policy be amended to encourage a reduced percentage of family-sized units to be provided.

Further, we have concerns with policy 5.2.5 and Table 5.1.

*‘5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1’*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

We note it is important to consider that the Regional policies were written at the Regional level (a more ‘macro’ level than City-wide) and meant to be implemented as such. Unless the City has done the analysis to understand if this model is workable, we question if it is appropriate to require these percentages on a smaller scale (City). Additionally, we feel the specificity afforded in this policy in the OP is unnecessary



as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing. As a reminder to staff, there are in-effect Provincial and Regional policy objectives which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. It is our opinion that the City should not be applying this requirement on a City-wide basis and rather, rely on the direction from the upper tiers to utilize the Inclusionary Zoning Areas as areas for the priority for housing affordability. The specificity of this policy appears to frustrate Provincial and Regional policy objectives of delivering a variety of housing options for current and future residents.

Conclusively, there are a number of, and variety of policies scattered throughout the OP which reference the need for diversified housing stock. Further, this policy regime is handled through the Inclusionary Zoning tool already in place.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. We note the following policies which are of concern:

Policy 8.3.12 reads:

*While new development need not mirror existing development, new development will:*  
*b. respect the continuity of front, rear and side yard setbacks*

This is better regulated in a Zoning By-law document. This policy does not appreciate nor capture an evolving City where development largely takes the form of infill. It is not appropriate to apply this blanket statement to new development with respect to setbacks. This could hinder the creation of desirable and animated pedestrian realms with street walls and frontages that help create a sense of place. We suggest removing this policy in its entirety.

Policy 8.4.1.17 reads:

*Built form will relate to the width of the street right-of-way*

Imposing this policy related to building heights and ROW widths is problematic. In our opinion, the restriction of building predicated on its relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location which could be contrary to the policies directing growth to certain areas and those outlined in the City's hierarchy. This will challenge the delivery of high-quality, refined, efficient, compact, transit supportive development in targeted locations and will hinder the development potential of lands.

Once again, there are policies in the Official Plan that are more suitable to regulate building heights. Requiring a building to match or be lesser than a ROW width is a stretch and does offer the intended balance between urban design (a building's relationship with a street) and appropriate heights. If the City adopts this policy as is, it presents a dangerous precedent for development.



Policy 8.4.5.2 reads:

*Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.*

In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and intended users. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces – again, presenting a blanket approach to site design. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways through the use of consulting professionals in collaboration with City staff (through the development approvals process). Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance:

*Privately owned publicly accessible spaces ~~will be designed in accordance with~~ shall have regard for the city's standards for public open spaces.*

Policy 8.6.2.5 provides:

*Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane is overly restrictive and cannot be seen as the only contributing or definitive factor in regulating building heights. In our opinion, the angular plane requirement should be removed from the above-noted policy.

#### Chapter 10 – Land Use Designations

In terms of land uses, we provide comments related to the new Residential policies. We provide feedback on this designation as we assume the Site will obtain the requested 'Residential High Density' designation through the development application process – assuming an eventual approval. We are concerned with the City's approach to the 'Residential High-Rise' designation policies that we assume would come to apply to the Site. Specifically, policy 10.2.5.10 which provides:

*Lands designated Residential High-Rise will permit dwelling units in buildings that are above eight storeys, with a maximum height as specified in the Character Area or Special Site provisions. If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property*

We maintain our position from our previous submission - this presents an issue for infill applications or the redevelopment of presently underutilized sites, such as this site. In the absence of OP policies prescribing



maximum heights, the maximum permitted height on this site would effectively be one storey. This policy would be better worded to provide:

~~*If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property. Building heights in the Residential High Rise designation shall have a compatible massing and scale of built form that considers existing and planned context, and that enhances the role of the area in the City's hierarchy.*~~

We realize that this policy would effectively refer us to the PMTSA policies and schedules which prescribes at 25 storey height limit (discussed in Chapter 11- Transit Communities and the proceeding section of this Letter). In addition to our submission below, we feel that the Residential High Density land use policies needs to include language to speak to the appropriateness of height in a more general sense which would essentially permit development to exceed what is permitted as of right in the Official Plan.

We remind the City that the urban hierarchy is used to help guide growth and densities, City-wide. In fact, as outlined in Chapter 8.6.1 of the OP, High-rise buildings *provide transit-supportive densities and play an important role in allowing the city to meet its growth targets, especially within Strategic Growth Areas*. Imposing overly restrictive policies on sites which are situated in areas which would otherwise be targeted for growth per the direction of the urban hierarchy is counterproductive to the intent of those policies themselves. We encourage the city to broaden the policy language to put the onus on the proponents to prove the appropriateness of heights through the development application process. We point to the policies found in Chapter 8.6.1 Buildings and Building Types which point out certain requirements or standards for Tall Buildings (a term interchangeable with High Density) which can be used to guide or inform the appropriateness of proposed heights.

#### Chapter 11 – Transit Communities

Chapter 11 provides a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We note that the inclusion of MTSA policies may be premature as informed by OPA 143 and 144 considering these amendments are still subject to the Region of Peel approval and as such, not yet in full force and effect.

That said, we acknowledge the Cooksville PMTSA mapping and schedules. This site is identified as having height permissions between 3 and 25 storeys.

In our opinion, while the City presently has permission to implement maximum heights in the Mississauga Official Plan, what is shown on the schedules do not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Further, these maximum heights have been identified without careful analysis and will limit the redevelopment potential of lands where transit-oriented, mixed-use development ought to occur. Contrary to good planning, these maximum heights will become a barrier to accommodating development in appropriate locations, in proximity to higher order transit where higher density, transit-supportive development ought to be, and will be a barrier to supporting greater housing choice and the delivery of 1.5 million new housing units challenging the implementation of Provincial policy objectives. We feel, conversely, that with respect to PMTSA's, the City of Mississauga



should include policies that provide flexibility that better account for specific locational considerations that align with the aspirations of PMTSA's.

Height can and should be deployed to emphasize the urban hierarchy where it is deemed appropriate through the technical, supporting studies. We acknowledge that in the OP the "*Fairview, Cooksville and Hospital Character Areas will provide for a diverse mix of uses, but with lesser densities and heights than the Downtown Core*" however it is important to highlight the importance of the urban hierarchy and to realize that with the unlimited heights in the City Centre/Downtown Core, areas emphasized through the urban hierarchy such as Cooksville (and Major Nodes) should act as transitional areas or secondary areas in the City prioritized for growth – this idea of an urban hierarchy simply is not supported with a 25-storey height cap in these strategic growth areas. Applying a 25 storey height cap effectively renders the urban hierarchy moot. We have major concerns that if adopted, the height policies in the MTSA's will be non-appealable and that the City will have missed opportunities to capitalize on (re)development in strategic growth areas. We strongly suggest staff revisit the heights or alternatively, ensure that there are appeal rights granted to proponents which allows applicants to demonstrate the appropriateness of heights.

#### Chapter 12 – Urban Growth Centres

The Fairview, Cooksville and Hospital Urban Growth Centres are captured under Section 12.3 of the Official Plan.

Particularly, Policy 12.1.1.6 which reads:

*Proponents of development applications within the Urban Growth Centre may be required to demonstrate how new development contributes to a concentration and mix of jobs as a key component of a mixed use transit-supportive development.*

The above-noted policy is likely to have unintended consequences. It is concerning when reviewed against evolving community contexts and needs nor market trends. This policy does not respond to either of those characteristics. In this respect, there is an important integration of economics and land use planning which cannot be guided solely by nor necessitated through an Official Plan. This should be reviewed through an outside study conducted by a qualified professional. The requirement to demonstrate how a development contributes to a concentration of jobs may prevent the development potential of lands from being realized. Not only that, but the policy itself is quite vague. What defines a 'concentration of jobs'? The above-noted policy requires modification to provide greater flexibility for mixed-use developments to accommodate an appropriate amount of non-residential uses and to respond to locational and contextual attributes:

*Proponents of development applications within the Urban Growth Centre ~~may be required to~~ should consider ~~demonstrate~~ how new development contributes to a concentration and mix of jobs and whether it is contextually appropriate ~~as a key component of a mixed use transit-supportive development~~. The proponent may consider providing an appropriate amount of GFA to accommodate for non-residential uses providing employment opportunities.*

While we appreciate the importance of employment creation and retention, it may be more suitable for the City to review the application on it's own to determine the possible/projected amount of jobs rendered from





a new development and incorporate that into their own monitoring model. This should be done in collaboration with the proponent to ensure the accuracy of the projected number of jobs. This affords the City the ability to monitor employment retention and generation and understand what jobs are required as well as where they are required and when. It is also unclear as to whether the City has an accurate understanding of employment trends and what is the future of jobs, by employment classification. Research on this matter would better inform Official Plan policies on concentration and mix of jobs.

We are concerned with the revisions to the Cooksville policy framework. Within Chapter 12, policies under section 12.3.2 Urban Form and Building Transition provide design standards are set out for certain street typologies (which are also classified in the Official Plan document). John Street is classified as a “B” Street per Section in this Chapter. While generally we support the design policies at a high level, we question the requirement provided for setbacks along “B” Streets:

*Development [along B Streets] will address the following:*

*b. generous setbacks from the street to accommodate, among other things, landscaping, terraces, bus shelters, and pedestrian scaled lighting;*

The policy as written (b) appears to require generous setbacks to buildings from streets. Not only is this a standard better handled through a Zoning By-law, we question if this can be considered a general or blanket approach for all sites. With this one size fits all assumption presently applied, we would encourage the City to either revise the policy or to include additional language surrounding smaller setbacks to street which assist in creating an animated and desirable pedestrian realm. Alternatively, considering the limitations on block depth for developments on the north side of John Street, and their proximity to primary transit infrastructure, John Street should be excluded from any street classification. If it is felt that it is necessary to include this classification, the policies related to “B” Streets could include an additional provision which considers reduced or smaller setbacks to buildings:

*e. reduced or minimal setbacks to buildings can be considered through the site design process where it has been deemed appropriate in consideration of site context, or as a result of unique site circumstances.*

Where appropriate and shown as feasible through the development application process (such as through a Streetscape Feasibility Study), reduced or minimal setbacks could be considered more appropriate and supportive of a desirable pedestrian realm and the wise use of space.

Section 12.5.1 speaks to the Cooksville Urban Growth Centre specifically. We have some concerns with the policies presented in Chapter 12.5.

Section 12.5.4 speaks to Building Heights, specifically 12.5.4.2:

*On lands designated Residential High-rise and Mixed Use and located outside of Special Site 1 in Cooksville Urban Growth Centre, the maximum permitted building height as shown on Schedule 8: Protected Major Transit Station Area (Schedule 8I) may be exceeded by up to three storeys without an amendment to this Plan, subject to meeting the building transition policies of this Plan,*



*where a development provides additional non-residential uses, including community infrastructure. One additional storey in building height may be permitted for every 900 square metres of non-residential gross floor area (GFA) provided above the first storey. This does not include amenity space, above grade parking or ground floor non-residential uses, where required by the policies of this Plan.*

While we have clearly laid out our position on the restrictiveness of the heights imposed through the MTSA mapping, we note that this policy, while providing some permission for additional height in exchange for other features, does not supplement nor address the restrictiveness of the 25 storey cap. This policy should be revised as follows:

*On lands designated Residential High-rise and Mixed Use and located outside of Special Site 1 in Cooksville Urban Growth Centre, the maximum permitted building height as shown on Schedule 8: Protected Major Transit Station Area (Schedule 8I) may be exceeded ~~by up to three storeys~~ without an amendment to this Plan, subject to meeting the building transition policies of this Plan, ~~where a development provides additional non-residential uses, including community infrastructure. One additional storey in building height may be permitted for every 900 square metres of non-residential gross floor area (GFA) provided above the first storey. This does not include amenity space, above grade parking or ground floor non-residential uses, where required by the policies of this Plan.~~*

While we agree that in certain situations density bonusing in exchange for desirable uses/built forms may be a useful tool, it is not appropriately applied in this instance. It should not be applied in PMTSA's specifically, where the as of right permissions for heights should be either non-existent (evaluated through the development review process) or have a degree of flexibility to exceed what may be permitted in the OP. Additionally, it seems counterintuitive to provide non-residential uses accessible to the public beyond the first storey. This could create unintended consequences in the way of vacancies and underutilized spaces in strategic areas.

#### Chapter 14 – Neighbourhoods

We have some concerns about the policies outlined in “Neighbourhoods” as it relates to this application:

Policy 14.1.1.1 provides:

*For lands within a Neighbourhood, a maximum building height as prescribed by the applicable Land Use Designation will apply unless Character Area policies specify alternative building height requirements or until such time as alternative building heights are determined through the review of Character Area policies.*

Policy 14.1.1.2 provides:

*and within a Neighbourhood that are located in a Protected Major Transit Station Area are subject to height and land use provisions as prescribed by the applicable protected Major Transit*



*Station Area policies and as shown in the applicable protected Major Transit Station Area Schedule.*

We have iterated our position on the restrictiveness of the heights permitted through the MTSA policies and refer the reader to our points above regarding same.

Conversely however, we think that the policies outlined in 14.1.3.5 related to Development in areas designated High-Rise are much more rational and logical in determining acceptable building heights as they evaluate the appropriateness of heights in the context of the area and a proposal's ability to meet certain guidelines and performance standards such as angular planes (to some extent), separation distances and strategic stepping/building design based on a site's interface with adjacent land use designations/uses. This affords the City the ability to review the appropriateness of heights through the development application process. We feel that the 25 storey height limitation could and likely will preclude sites from developing to an intensity which is otherwise appropriate in the context of the guidelines put forward (angular plane analysis, sun/shadow analysis, etc). To achieve or support the policies which describe appropriate heights related to performance standards, the City must consider a level of flexibility in permitted building heights as prescribed through the MTSA mapping and schedules or confirm that proponents have the right to apply through a private development application to amend the heights prescribed in the MTSA mapping and schedules.

Thank you for the opportunity to provide comments on the City's Official Plan draft consolidation. We would be happy to discuss our comments with staff, if necessary.

Sincerely,

**GLEN SCHNARR & ASSOCIATES INC.**

**Maurice Luchich, MCIP, RPP**  
**Senior Associate**

**Sarah Clark, MCIP, RPP**  
**Associate**



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March 14, 2024

**BY EMAIL [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca) & REGULAR MAIL**

City of Mississauga  
Planning & Development Committee  
300 City Centre Drive, 3<sup>rd</sup> Floor  
Mississauga, Ontario  
L5B 3C1

Attn: Councillor C. Fonseca, Chair, Planning & Development Committee

**Re: March 18, 2024 Planning and Development Committee Agenda  
Item 6.4 – ‘Proposed Mississauga Official Plan 2051’  
Submission on behalf of Orlando Corporation - ‘Heartland Town Centre’  
City of Mississauga File CD.02-MIS  
Our File No. 1421**

We are the planners of record writing on behalf of Orlando Corporation (‘Orlando’). We appreciate the opportunity to provide stakeholder input regarding ‘Proposed Mississauga Official Plan 2051’ (‘MOP 2051’) in terms of Orlando’s properties comprising ‘Heartland Town Centre’.

Orlando consistently participates in the city’s planning programs as represented by submissions filed with the city regarding ‘Heartland Town Centre’ and related properties. As a Statutory Public Meeting, this submission is provided per the latest version of MOP 2051, and we request that our comments are fully considered in an effort to resolve all issues raised herein, prior to Council adoption of the final MOP 2051, proposed in Q2-2024.

## **‘Heartland Town Centre’ – West of Mavis Road – Support Mixed Use with Residential**

MOP 2051 Schedule 7 Schedule 7F Land Use Designations propose to change the existing ‘Mixed Use’ land use designation permitting existing uses, with the addition of ‘Residential’ land use. The modification per proposed policy **10.2.6 Mixed Use** and **10.2.6.2** is supported as it introduces future land use flexibility respecting ‘Heartland Town Centre’ lands located within the ‘East Credit Neighbourhood Character Area’. Please refer to Figure 1: Heartland Town Centre – Schedule 7F – Land Use Designations.

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Proposed MOP 2051 policy **10.2.6.2** reads:

“The planned function of lands designated Mixed Use is to provide a variety of retail, service and other uses to support the surrounding residents and businesses. Development on Mixed Use sites that includes residential uses will be required to contain a mixture of permitted uses. This mix of uses is required in order to create complete communities with destinations that are close enough for walking and cycling to be the most attractive transportation option. In addition to mitigating traffic congestion, this enhances human health and reduces greenhouse gas emissions.”

In addition, proposed MOP 2051 policy **10.2.6.3** reads,

“Redevelopment of Mixed Use sites must maintain the same amount of non-residential floor space.”

Policy **10.2.6.3** is not supported insofar that it has the potential to unduly burden the ratio of commercial and residential space in ‘Heartland Town Centre’. Should residential use be added to ‘Heartland Town Centre’ in the future, it will be phased and incrementally added, and at specific or preferred locations, based on a number of factors given the scale of the blocks and the need to properly manage commercial activity. Tying redevelopment to the same amount of non-residential floor space unnecessarily hampers the flexibility required should residential be added in the future.

### **‘Heartland Town Centre’ – West of Mavis Road – Business Employment Property**

MOP 2051 Schedules 7 and 7F, Land Use Designations depict an existing industrial property located at the north-east corner of Matheson Blvd. and Terry Fox Way measuring approximately 11 ha. in land area. This property is designated ‘Business Employment’ and is proximate to ‘Heartland Town Centre’. Please refer to Figure 1: Heartland Town Centre – Schedule 7F – Land Use Designations per MOP 2051 as proposed by the city.

There is a reasonable land use planning basis to modify this ‘Business Employment’ use to the same ‘Mixed Use’ that will apply to the remainder of the ‘Heartland Town Centre’ west of Mavis Road. Of note, Schedule 1, City Structure subsumes this property within the boundary of the ‘East Credit Neighbourhood Character Area’ with existing residential uses located to the south and north-west. Please refer to Figure 2: Heartland Town Centre Proposed Modifications to Schedule 7F – Land Use Designations as requested by Orlando.





### 'Heartland Town Centre' – East of Mavis Road - Request Mixed Use with Residential

*Employment Areas* were established by the Region of Peel Official Plan ('ROP') as initially approved by the MMAH in November 2022.

The proposed MOP 2051 Schedule 1, City Structure reflects the ROP Employment Areas Schedule E-4 as it splits 'Heartland Town Centre' now into two sections, which includes firstly, the 'Huronario Neighbourhood Character Area' to the south, and secondly the 'Gateway Employment Area' to the north. The interface or boundary between the Neighbourhood and Employment Character Areas is provided by Rodeo Drive and Regal Drive.

Notwithstanding, MOP 2051 Schedule 7 and Schedule 7F Land Use Designations proposes to change the current 'Mixed Use' land use designation to 'Employment Commercial' which does not permit the flexibility for residential land use such as that applied under the 'Mixed Use' designation provided to the 'Heartland Town Centre' lands located to the west of Mavis Road. Please refer to Figure 1: Heartland Town Centre – Schedule 7F – Land Use Designations.

Proposed MOP 2051 policy **10.2.10** Employment Commercial reads:

**10.2.10.1** Lands designated Employment Commercial are primarily located within *Employment Areas* and are subject to policies in Chapter 15, Employment Areas.

**10.2.10.2** Lands designated Employment Commercial will permit all uses permitted within the Mixed Use designation, except residential uses.

Since the 'Employment Commercial' land use designation is primarily applied to *Employment Areas*, it therefore requested that the 'Heartland Town Centre' lands, located in the 'Huronario Neighbourhood Character Area' be modified to the **10.2.6 Mixed Use** land use designation on Schedule 7 and Schedule 7F Land Use Designations.

Our request is further illustrated on Figure 2: Heartland Town Centre Proposed Modifications to Schedule 7F – Land Use Designations





Of note, Schedule 1, City Structure identifies Neighbourhood Character Areas to the west, and south, with existing residential uses located the south. This includes the Mixed Use (including residential use) flexibility added to 'Heartland Town Centre' to the west of Mavis Road.

Lands to the north and east remain Employment Areas and to that end, MOP 2051 **11.6** Compatibility and **11.6.1** policies require protection of adjacent Employment Areas where *Development* will:

- a. be compatible with surrounding uses;
- b. mitigate impacts to and not interfere with existing or future operations of adjacent uses in ~~General~~ Employment Areas; and
- c. employ appropriate mitigation and compatibility measures as identified and secured through the *development* application process.

**11.6.2 Sensitive land uses**, including residential uses, proposed outside of and adjacent to or near to ~~General~~ Employment Areas, lands designated Industrial or Business Employment, or within the influence area of major employment facilities will need to demonstrate, to the satisfaction of the City, that:

- a. the use is appropriate in accordance with the policies of this Plan and subject to land use compatibility assessments, which may require a third party peer review to be conducted on behalf of the City at the applicant's expense;
- b. the recommended mitigation measures will contribute to an appropriate living environment and not pose a financial burden to future residents;
- c. the use would not adversely affect the overall viability of employment lands and facilities; and.
- d. the onus for mitigation will be on developers proposing new residential and/or other sensitive uses.





## **Fine-Grained Road Network Policies**

MOP 2051 includes and applies 'fine grain street pattern' policies to lands located within a *Protected MTSA*, recognized as being part of a *Strategic Growth Areas* as follows:

### **7.3 Complete Streets**

#### **7.3.4 Street Classification System**

*7.3.4.5 In Strategic Growth Areas, transportation decisions will support the creation of a fine grain street pattern, low traffic speeds, a mix of travel modes, and attention to the design of the public realm.*

### **8.2 Urban Form**

#### **8.3 City Pattern**

**8.3.7** Existing large blocks, within *Strategic Growth Areas* will be reconfigured to incorporate a *fine-grained block structure* with public roads and on-street parking to support at grade uses.

### **8.4 Public Realm**

#### **8.4.1. Streets, Blocks and Streetscape**

**8.4.1.6** The improvement of existing streets and the design of new streets should enhance connectivity by:

- a. developing a fine-grained system of roads;
- b. using short streets and small blocks as much as possible, to encourage pedestrian movement;
- c. avoiding street closures; and
- d. minimizing cul-de-sac and dead end streets.

Orlando sought and achieved a Settlement in February 2017 with the City ('OPA 25') as it relates to the city's policies on the development of a fine-grained road network or system for its 'Huronario Corridor' lands which can also be applied in principle to 'Heartland Town Centre' lands.

It was determined that new public roads or streets were not required within the Orlando's lands given the scale and impact on block size, as well as other limitations. It was also determined that where and if needed private roads with public easements would meet the City's goals of providing multiple routing options for all modes within the area, improving connectivity and manage the number of access locations.





It is noted that proposed MOP 2051 policy 7.3.4.7 reads; *“Future additions to the street network will be public streets. Public easements will be required for cases where a private street is considered. An appropriate terminus is required for the maintenance and operations where private street connects with a public street.”* As noted above, this policy needs to be carefully applied, particularly where projects will be functionally served by private driveway systems, independent of public streets and/or private streets with public easements.

As a result of the prior Settlement noted above, it is expected that any reference to fine grain road policies in MOP 2051, as per proposed city-wide policies 8.4.1.6, and any other references, would not specifically apply or be mandatory, and that the policies would be taken into consideration as part of development applications process in consideration of the needs of the applicant and the planned function of the land use.

#### **Clarification sought on the 26 m – 35 m as a new Right-of-Way Width**

MOP 2051 includes Schedule 6 Designated Right-of-Way Widths which introduces 26 m – 35 m as a new Right-of-Way Width.

We seek clarification as to how this new standard was determined, and how and where it may be applied in the future as it relates to local and minor collector roads as roads classifications located in employment areas. For example, is this a generic representation of a city planning objective or does it apply to unique circumstances or specific lands or roads within the city?

#### **The Future of 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours**

MOP 2051 includes Schedule 7 and a related catalogue of 14 sub-Schedules 7A thru 7N where the 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours are included on each of these Schedules.

Notwithstanding, the MOP 2051 Figure 4.17 includes the 1996 NEP/2000 NEF Composite Noise Contours, and in terms of MOP 2051. It is noted that *“The figures and associated captions have been provided for informational and illustration purposes only and are not policy”*.





As well, the Region of Peel Official Plan includes 'Figure 15 Aircraft Noise Exposure Composite Contours', where;

*"Figures are not part of the Region or Peel Official Plan and are provide for illustrative or informational purposes only and to show categories of areas typically subject to specific policies of the Plan. Information shown on figures may be changed or updated from time to time, without requiring an amendment to this plan." ROP page 4*

Given that the City is maturing in terms of urban development, the original role and purpose of the 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours is redundant and dated, as both the Region's and the City's Official Plans references the contours for informational purposes only, even though they appear on the MOPA 2051 Schedule 7 and related Schedules.

As well, Transport Canada is reviewing the current 1996 NEP/2000 NEF Composite Noise contour model (which measures perceived and subjective levels of annoyance) and is considering the aircraft noise model used by the FAA, which relies on a truer dBA methodology for noise measurements. Transport Canada's review will be completed well within the horizon of MOP 2051.

Therefore, we request that the 1996 NEP/2000 NEF Aircraft Noise Exposure Composite Contours be removed from Schedule 7 and the related catalogue of 14 sub-Schedules 7A thru 7N and only remain in MOP 2051 for informational purposes as per Figure 4.17.

### **Urban Design Criteria should be reasonably applied to Employment Areas**

MOP 2051 contains numerous policies regarding urban design criteria and implementation should be reasonably applied to Employment Areas so as to not unreasonably or negatively impact the planned function, cost and delivery of employment lands and buildings. Many of these policies are included in Chapter 8 Well Designed Healthy Communities. Proposed policies that affect urban form, city pattern, public realm, etc. need to be carefully applied as they relate to the planned and business functions of employment lands.

Overly restrictive Official Plan policies and rigorous zoning regulations should be avoided in light of the principle that a building's overall function will determine its built form and productive business employment requirements.

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In conclusion, we would also appreciate our firm being placed on the City's mailing list regarding any future public notices, updates, reports, Committee and Council Agenda related Items, and any Council decision or actions on the above captioned matter. Please note this submission does not preclude any future submissions regarding this matter.

Thank-you in advance for your co-operation, and please advise if any additional information is required to further support our submission at your earliest convenience.

Yours truly,

Pound & Stewart Associates Limited



Philip Stewart MCIP, RPP

/la 1421ltr\_Proposed MOP 2051\_March.14.2024

Attachments: Figures 1 and 2 as noted herein

cc. Ms. D. Rusnov, Office of the City Clerk, City of Mississauga  
[Diana.Rusnov@mississauga.ca](mailto:Diana.Rusnov@mississauga.ca)

cc. Mr. A. Whittemore, Commissioner of Planning & Building, City of Mississauga  
[Andrew.Whittemore@mississauga.ca](mailto:Andrew.Whittemore@mississauga.ca)

cc. Mr. J. Bevan, Director, Planning Strategies, City of Mississauga  
[Jason.Bevan@mississauga.ca](mailto:Jason.Bevan@mississauga.ca)

cc. Mr. B. Phillips, 'MOP 2051' Planner, Planning & Building Department, City of Mississauga  
[Ben.Phillips@mississauga.ca](mailto:Ben.Phillips@mississauga.ca)

cc. Ms. C. Peters, 'MOP 2051', Economic Development Office, City of Mississauga  
[Cheryl.Peters@mississauga.ca](mailto:Cheryl.Peters@mississauga.ca)

cc. Ms. T. Buonpensiero, Chief Planner, Region of Peel  
[tara.buonpensiero@peelregion.ca](mailto:tara.buonpensiero@peelregion.ca)

cc. Mr. L. Longo, Aird & Berlis

cc. Client

POUND & STEWART ASSOCIATES LIMITED





FIGURE 1: HEARTLAND TOWN CENTRE - SCHEDULE 7F - LAND USE DESIGNATIONS

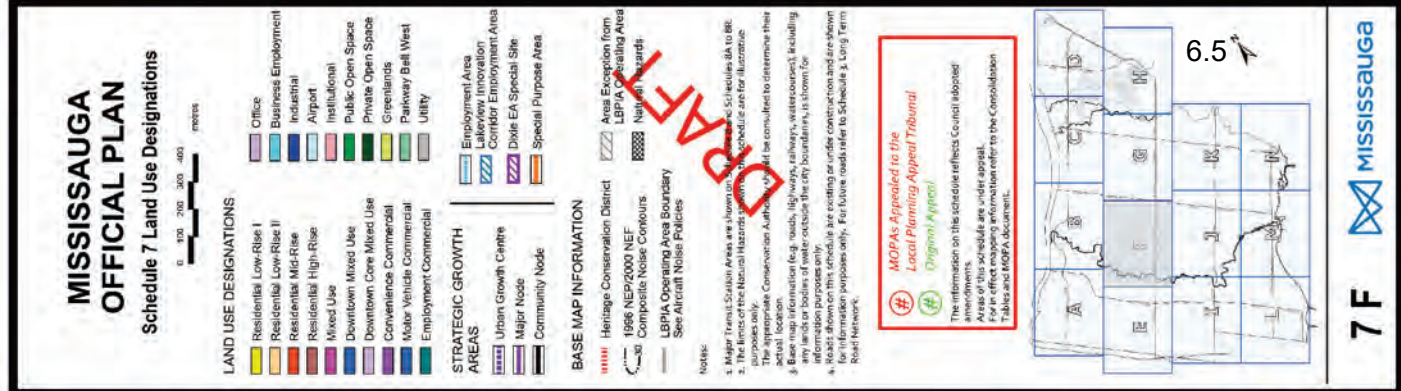
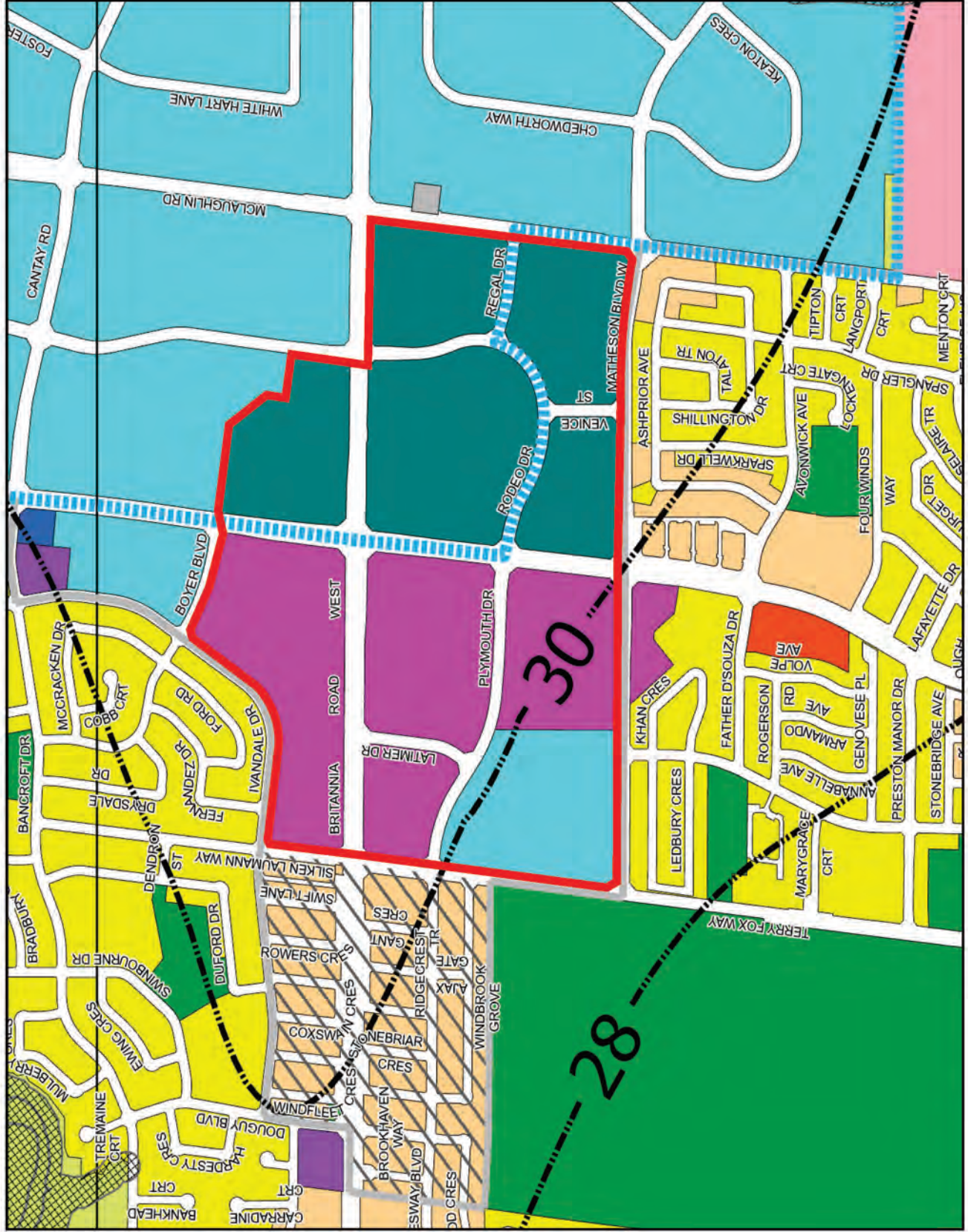
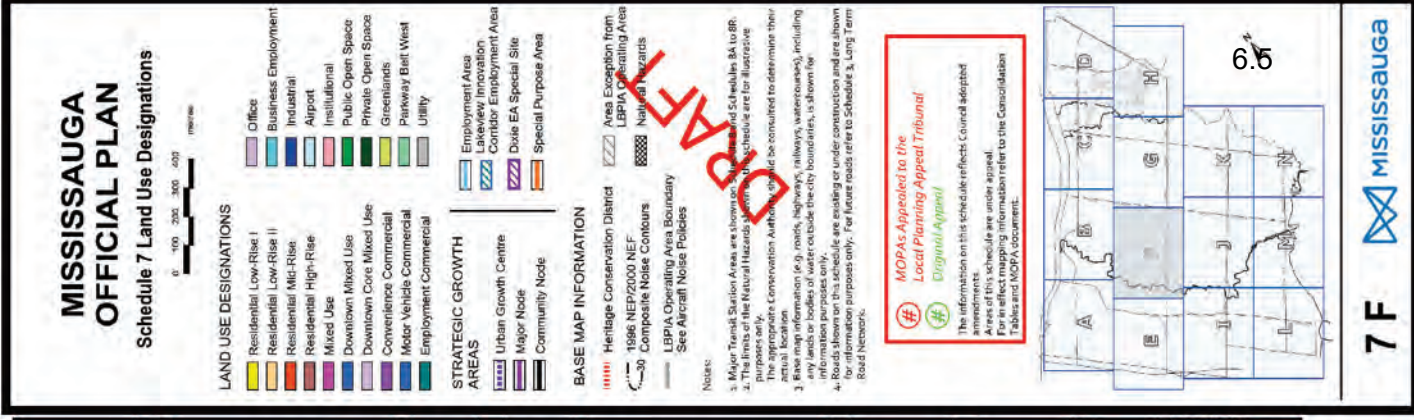
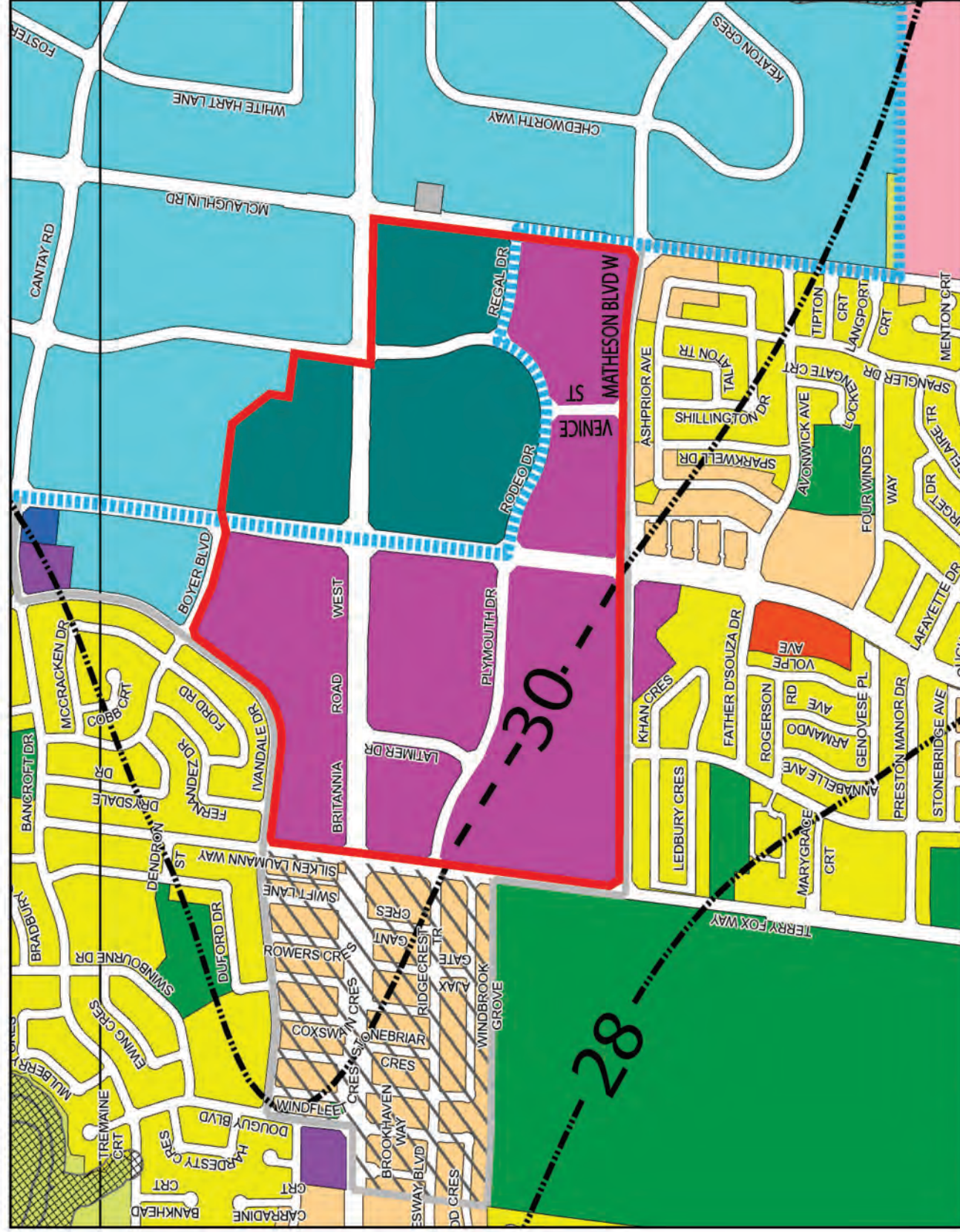




FIGURE 2: HEARTLAND TOWN CENTRE PROPOSED MODIFICATIONS TO SCHEDULE 7F - LAND USE DESIGNATIONS







March 15, 2024

**By E-Mail to [deputations.presentations@mississauga.ca](mailto:deputations.presentations@mississauga.ca)**

Planning and Development Committee  
City of Mississauga  
300 City Centre Drive  
Mississauga ON L5B 3C11

**Attention: Angie Melo, Legislative Coordinator; Amina Menkad, Project Lead; Ben Phillips, Project Manager**

Dear Sirs/Mesdames:

**Re: Proposed Mississauga Official Plan 2051**

Dream Asset Management is the agent for related corporations who are owners of various lands within the City of Mississauga, including 70 Park Street East (MPCT DIF DREAM 70 Park Street East LP) (collectively referred to herein as "Dream") located in the Port Credit PMTSA.

We are writing with respect to the proposed Mississauga Official Plan 2051 ("MOP 2051") released in February 2024. We understand the proposed MOP 2051 is available for review and comment, and that a statutory public meeting is scheduled for March 18, 2024, at the Planning and Development Committee ("PDC") meeting. We hereby provide a written submission to PDC for consideration and this letter reiterates comments we have previously provided.

We attended the Statutory Public Open House that occurred virtually on February 27, 2024, and have reviewed the staff report CD.02-MIS that will be received for information at the March 18, 2024, PDC meeting. We are also reviewing MOP 2051 and have provided comments below based on our review to date that largely relate to the proposed PMTSA policies within the proposed MOP 2051.

Dream generally supports the steps taken by the Region of Peel and the City of Mississauga in developing a policy framework for PMTSAs. Planning for PMTSAs is a critical tool for municipalities to accommodate population and economic growth, promote social change and further sustainability goals by supporting transit-oriented communities. Provincial policy directs land use patterns within these areas to have a density and mix of land uses that efficiently use land, are appropriate for planned or available infrastructure, support active transportation, and are transit supportive. Likewise, policies within the Region of Peel and City of Mississauga Official Plans promote intensification, appropriate density, and a range and mix of uses around transit to encourage the development of complete communities.

Dream's purpose-driven approach to real estate investment is well aligned with the objectives of the proposed PMTSA policy. Dream is committed to supporting community health and well-being while reducing socioeconomic inequalities and seeking creative and sustainable methods to make our communities more integrated and collaborative. Our goals as a company align with those of the Province, Region, and City in promoting economic, social, and environmental sustainability by creating

transit-oriented and walkable communities with a strong emphasis on social and environmental improvements.

We note below the following proposed policies within the proposed MOP 2051:

- Lands within a PMTSA are subject to density, height and land use policies and schedules related to the applicable PMTSA. We would like to acknowledge our appreciation for the City's consideration of cases where a conflict between these policies and other policies and schedules within MOP 2051, PMTSA policies and schedules will take precedence, where applicable (10.1).
- Minimum and maximum height permissions have been moved from the City Structure policies to dedicated Urban Growth Centre and Nodes chapters. Overall height ranges for City Structure elements remain generally unchanged; however, additional Chapters provide policies with alternative or updated height permissions. Instead, the City Structure policies outline the planned built form per City Structure element, including whether buildings are generally planned to be low-, mid-, or high-rise. Building height maximums are prescribed by land use designations and local area policies. The subject site is designated Residential High-Rise which permits dwelling units in buildings that are above eight storeys, with a maximum height as specified in the Character Area or Special Site provisions (10.2.5.10). MOP 2051 notes if the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property.
- The Port Credit Local Area Plan ("PCLAP") includes policies for lands in south central Mississauga, noting high-rise building forms will be located near the GO transit station. The Port Credit Community Node has the potential to reach the targeted minimum density of 200 residents and jobs combined per hectare for the Port Credit PMTSA, noting the City will monitor the gross density and assess its ability to meet the target density over time (5.2.1). The PCLAP directs that permitted building heights for new development in the Community Node will support the Vision as an urban waterfront village and have regard for the existing context. Per Map 2B, height limits for the subject property are identified as having a minimum height of 2-storeys and maximum height of 15-storeys.

We appreciate the steps taken to respond to comments raised through the MOP 2051 public engagement process and would encourage further refinements to policies in response to stakeholder comments. Dream would be supportive of height permissions that are higher than those currently proposed and would have significant concerns if permitted maximum heights within PMTSAs were any lower than currently proposed.

As expressed by other stakeholders through written submissions and deputations to PDC, we also continue to have concerns regarding the City's position that no amendments will be permitted to PMTSA policies once implemented. We see an opportunity to be more flexible with potential amendments than what is currently contemplated. The intent of the Official Plan is to set the City's long-term vision and a framework to achieve that vision. The ability to amend Official Plan policies provides a degree of flexibility to account for site-specific considerations that cannot be captured in area-wide studies that inform Official Plan policies. We believe the restrictions on amendments to



PMTSA policies place unnecessary limitations on the flexibility of the Official Plan. We respectfully request the City reconsider its position on the ability of applicants to amend specific PMTSA policies.

We respectfully request Council consider our above comments and concerns while finalizing the proposed MOP 2051. Dream seeks to ensure that the PMTSA policy framework can achieve the goals of the Provincial Policy Statement (2020) and Growth Plan (2020, as amended), as well as support our shared goals of achieving sustainable, transit-oriented, and complete communities.

Please also accept this letter as our request for notice of all decisions and passage of by-laws in relation to the above.

Yours truly,



Justin Robitaille  
Development Lead  
[jrobitaille@dream.ca](mailto:jrobitaille@dream.ca)  
Dream Asset Management

cc: Paul Cope and Alex Heath, Dream Asset Management  
Rodney Gill, Goodmans LLP  
Ed Sajecki and Michi McCloskey, Sajecki Planning



March 14, 2024

Members of Council  
City of Mississauga  
300 City Centre Drive.  
Mississauga, Ontario  
L5B 3C1

Sent via email to [application.info@mississauga.ca](mailto:application.info@mississauga.ca)

RE: **Planning and Development Committee, March 18, 2024**

**Item 6.4 – Proposed Mississauga Official Plan 2051.**

---

The Building Industry and Land Development Association (BILD) has recently received Item 6.4 Proposed Mississauga Official Plan 2051 that is scheduled to be presented at the March 18<sup>th</sup> Planning and Development public meeting. We appreciate the opportunity to submit our comments, and we trust that you will give them careful consideration.

By way of this correspondence, BILD would like to advise Council that we have disseminated this information to our membership and are still actively gathering comments on this new Official Plan. As such, BILD's comprehensive submission will be submitted in the near future, prior to Council consideration in Q2 of 2024.

As of today, certain policies in the Chapters of the Mississauga Official Plan 2051 have raised concerns among our membership:

- Chapter 3 - *Directing New Development*;
- Chapter 5 - *Housing Choices*;
- Chapter 8 - *Well Designed Healthy Communities*;
- Chapter 10 - *Land Use Designations*;
- Chapter 11 - *Transit Communities*; and
- Chapter 12 - *Urban Growth Centre*.

*\*Please note, that depending on additional comments from our membership, this list may expand.*

Thank you for providing us with the opportunity to review this information with our members. Please feel free to contact the undersigned with any points requiring clarification. Additionally, we would like to take this opportunity to request confirmation regarding the timeline for Council approval, understanding that Q2 2024 is a general estimate.

Kind regards,

Victoria Mortelliti, MCIP, RPP.  
Senior Manager, Policy & Advocacy

CC: BILD Members  
Angie Melo, Legislative Coordinator, City of Mississauga

\*\*\*

*The Building Industry and Land Development Association is an advocacy and educational group representing the building, land development and professional renovation industry in the Greater Toronto Area. BILD is the largest home builders' association in Canada, and is affiliated with the Ontario Home Builders' Association and the Canadian Home Builders' Association. It's 1,300 member companies consists not only of direct industry participants but also of supporting companies such as financial and professional service organizations, trade contractors, as well as manufacturers and suppliers of home-related products.*





Partners: 6.5

**Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**March 15<sup>th</sup>, 2024

GSAI File: 1185-001

(Via Email)

Chairman and Members of the Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L3B 3C1

City Clerk  
 City of Mississauga  
 300 City Centre Drive - 2nd Floor  
 Mississauga, ON L5B 3C1

**RE: Mississauga Official Plan 2051**  
**6719 Glen Erin Drive**  
**Related File: #SP 23-2 W9**  
**Blackrock Aquitaine Limited**

Glen Schnarr & Associates Inc. (GSAI) are the authorized agents and planning consultants for Blackrock Aquitaine Limited, owners of the property municipally addressed as 6719 Glen Erin Drive in the City of Mississauga (herein referred to as the “subject lands”). Glen Schnarr and Associates Inc. (GSAI) is pleased to make this submission regarding the Mississauga Official Plan Review (the “draft Official Plan”) on behalf of Blackrock Aquitaine Limited.

The subject lands are located in the Meadowvale Neighbourhood Character Area and are designated Residential High Rise in the draft Official Plan. There is an existing 13-storey residential apartment on the subject lands and planning applications are currently being processed to facilitate a new 12-storey building and townhouses. The subject lands are proximate to the Meadowvale GO station (approximately 1 kilometre or a 10-minutes walk) and are opposite the Meadowvale Town Centre (Meadowvale Mall Node). The subject lands are well-served with jobs, services and infrastructure and provide the opportunity for the provision of transit-supportive housing.

When complete, the draft Official Plan initiative will culminate in a new Official Plan (the proposed “Mississauga Official Plan 2051”) that will modify the policy framework permissions for lands across the City. We understand that the final Official Plan will be considered by the Planning and Development Committee in Q2 of 2024. Following adoption by Council, the City's new Official Plan will be sent to the ultimate approval authority for final approval — either the Region of Peel or the Province of Ontario.

We are pleased to provide the below comments on the current draft Official Plan, released on February 12, 2024 and to formally state our client's objection to the policies as currently drafted.

Generally, we are concerned with the policy framework for Residential Mid Rise, Residential High Rise and Mixed Use designated lands. Policy 10.2.5.10 provides that designated Residential High Rise lands will permit heights above 8 storeys, up to a maximum specified in the Character Area or Special Site



provisions. Alternatively, if a maximum height is not specified in the Character Area or Special Site provisions, then Residential High Rise designated lands will have a maximum height that cannot exceed the tallest building on the property.

### ***Meadowvale Neighbourhood Character Area***

The subject lands are located within and subject to the Meadowvale Neighbourhood Character Area policies. The draft Official Plan presents refinements to Chapter 14.10 Meadowvale as below:

Policies 14.10.2.2, 14.10.2.5, 14.10.2.6 are concerning and we object to the current language as written in the draft Official Plan:

*14.10.2.2. Notwithstanding the policies of this Plan, building heights of up to 12 storeys may be permitted on lands designated Mixed Use and Residential High Rise subject to the following requirement:*

*a. new and existing buildings do not exceed a maximum floor space index (FSI) of 2.0.*

*14.10.2.5. The built form in Meadowvale will preserve an open and green character by:*

- b. maintaining generous access to natural light, sky views and privacy with a minimum separation distance of generally 40 metres between portions of buildings that are greater than six storeys; and*
- c. ensuring new buildings above four storeys relate to their surrounding context and achieve an appropriate transition in height generally consistent with a 45 degree angular plane to adjacent low-rise residential areas.*

*14.10.2.6. Taller buildings between nine and 12 storeys will be required to incorporate podiums that are a minimum of three storeys and a maximum of six storeys. For the purposes of these policies, podium means the base of a building that is distinguished from the taller portion of the building by being set forward or articulated architecturally.*

We find it peculiar and have particular concern that building heights are limited to a maximum of 12 storeys and FSI to a maximum of 2.0 in the Residential High Rise designation. Meadowvale is a growing community well-served by infrastructure, jobs, services, transit and multi-modal transportation and is an ideal area to locate new housing in the midst of a nation-wide housing crisis. We anticipated that the draft Official Plan review would have provided an opportunity for the City to revisit the existing permissions and consider allowances for taller buildings in an area well-suited for this type of development. We respectfully object to the height and density limitation being imposed in Meadowvale and in particular for the subject lands. We recommend that the City revise the policies to reflect heights of at minimum 16 to 18 storeys with no limitation on FSI.

Policy 14.10.2.2 does not provide sufficient guidance on how the limitation of density is to be applied. For example, as written, the policy suggests that the maximum density applies to all lands within an area and not on a site-specific basis. Gross or net site density is informed and derived from various inputs through a planning application as the ultimate development concept is created. Refinement is required to clarify to what scale the maximum density limitation applies. We also request that the maximum density be increased

to enable built forms that are sufficiently dense to support compact, pedestrian-oriented and transit-supportive development and housing.

Further, we are concerned with the application of angular planes and the introduction of a 40-metre separation distance between buildings in Meadowvale and on High Rise Residential sites. Introducing a policy requirement that an angular plane, without specifying how an angular plane is to be applied, should be removed. Creating a separation distance of 40 metres is unnecessarily onerous and will discourage opportunities for intensification and redevelopment on the many tower-in-the park residential high rise sites in Meadowvale, including the subject lands. These policies should be re-written or removed.

Finally, we are concerned with Policy 14.10.2.6 as written. A policy requiring taller built forms be designed in such a manner to incorporate a podium is overly restrictive, contrary to good planning and design practices and will challenge the development potential of the subject lands and lands in Meadowvale. Podiums are often appropriate to mixed use style developments where there is increased emphasis on the streetscape to provide for street level retail and commercial uses. This policy should be removed to enable contextually appropriate development forms to be introduced at appropriate locations across the Meadowvale community and on the subject lands, being a High Rise Residential site.

#### Summary

Collectively, we find ourselves in a housing crisis in Mississauga and in the Country and Province overall. All levels of government and the CMHC are projecting extreme shortages in housing over the next 10 years. The subject lands represent an opportunity to provide additional housing and can easily accommodate buildings taller than 12-storeys. The existing 13-storey building on the subject lands was built in the 1980s in a time when there was no housing crisis or shortage. Taller buildings can be found in Meadowvale. It is bizarre that we are regressing and reducing building heights further than what was permissible in the 1980s in the midst of a housing crisis. There have been significant investments in transportation, services and employment in the immediate surrounding area. For example, the City's Life Sciences Cluster Strategy document anticipates significant employment in the Meadowvale Business Park employment area immediately north and east of the subject lands. We strongly encourage the City to revisit the height and density policies for Meadowvale and specifically for the subject lands.

In summary and given the above, we object to the proposed policy and revisions outlined in the draft Official Plan. We are requesting that the City reconsider the maximum height and density in Residential High Rise sites and specifically on the subject lands. The subject lands are an existing, underdeveloped "tower in the park" site with an opportunity to accommodate increased height and density to address the housing crisis by providing additional housing supply in a well-served area suited for pedestrian-oriented and transit-supportive development forms.

Given any development application must consider and conform with the Mississauga Official Plan in its totality, it is our opinion that many of the proposed policies and those specific to the Meadowvale Neighbourhood Character Area are overly and unnecessarily restrictive and not appropriate to the Meadowvale context or for the subject lands.





Please continue to include GSAI in the Official Plan review initiative and any future updates, meetings and timelines to review and provide comments on new iterations the draft Official Plan prior to adoption.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

---

Bruce McCall-Richmond, MCIP, RPP  
Senior Associate

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:***Glen Schnarr**March 15<sup>th</sup>, 2024

GSAI Files: 1067-001C and 1067-002

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

City Clerk

City of Mississauga

300 City Centre Drive - 2nd Floor

Mississauga, ON L5B 3C1

**RE: Mississauga Official Plan 2051**  
**City File: CD.02-MIS**

**135, 151 and 157 City Centre****Camcentre Holdings Inc., Camcentre 2 Holdings Inc., Camcentre 3 Holdings Inc.****Related Files: SP 21-159 W4, SP 19-56 W4, SP 20-113 W4, H-OZ-19-003****3672 Kariya Drive and 134-152 Burnhamthorpe Road West****2729740 Ontario Inc.****Related Files: H-OZ 22-5 W7, SP 22-60 W7, OLT-23-000406**

Glen Schnarr & Associates Inc. (GSAI) are the authorized agents and planning consultants for Camcentre Holdings Inc., Camcentre 2 Holdings Inc., Camcentre 3 Holdings Inc. and 2729740 Ontario Inc. owners of the properties municipally addressed as 135, 151 and 157 City Centre, 3672 Kariya Drive and and 134-152 Burnhamthorpe Road West in the City of Mississauga (herein referred to as the “subject lands”). Glen Schnarr and Associates Inc. (GSAI) is pleased to make this submission regarding the Mississauga Official Plan Review (the “draft Official Plan”) on behalf of Camcentre Holdings Inc., Camcentre 2 Holdings Inc., Camcentre 3 Holdings Inc. and 2729740 Ontario Inc.

Planning applications are currently under review for the subject lands. For the 135, 151 and 157 City Centre lands Site Plan Approval applications SP 21-159 W4, SP 19-56 W4, SP 20-113 W4 are currently being finalized for a three-phase mixed-use development. By-Law Number 0153-2023, being a By-law to lift the (H) Symbol was enacted in September of 2023. The proposed development consists of four mixed-use buildings.

For the 3672 Kariya Drive and 134-152 Burnhamthorpe Road West lands, Site Plan Approval application SP 22-60 W7, submitted on April 4, 2022 and Removal of the (H) Holding Symbol application H-OZ 22-5 W7, submitted on June 10, 2022 are currently under review. The (H) Symbol application is currently in an OLT proceeding. Both applications have been deemed complete by the City. The proposed development consists of four mixed-use buildings.



When complete, the draft Official Plan initiative will culminate in a new draft Official Plan (the “Mississauga Official Plan 2051”) that will modify the policy framework permissions for lands across the City. We understand that the final Official Plan will be considered by the Planning and Development Committee in Q2 of 2024. Following adoption by Council, the City's new Official Plan will be sent to the ultimate approval authority for final approval — either the Region of Peel or the Province of Ontario, depending on the coming-into-force date of forthcoming changes to the *Planning Act*.

We are pleased to provide the below comments on the current draft Official Plan, released on February 12, 2024 and to formally state our objection to the policies and Schedules as drafted.

### Urban Growth Centre

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the draft Official Plan. The subject lands remain in the Urban Growth Centre, Downtown Core and in The Exchange District.

We object to Downtown Core policies that suggest increases in employment opportunities should be accommodated (Policies 12.2.4.2-3) and policies relating to the incorporation of office uses (Policy 12.2.4.4). The requirement for replacement of jobs or a concentration of jobs within a development is inconsistent with the development vision established by Provincial and Regional policy objectives for the Downtown Mississauga Urban Growth Centre. In accordance with the in-effect Provincial and Regional policy frameworks, an Urban Growth Centre is to provide for a range and mix of housing and employment uses to achieve high-density, mixed use areas, while supporting the creation of complete communities whereby residents are able to live, work, shop and play within their community of choice. Imposing employment minimums, quotas or thresholds is unnecessarily restrictive, will challenge the ability for lands to support the delivery of high density, compact, mixed-use forms and inadvertently places an emphasis on employment uses and density when the nature of a specific development may not warrant it. In our opinion, the provision of appropriate employment uses and density is a matter best addressed during the site-specific technical evaluation of a development application.

### Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. We object to draft Official Plan Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as provided below:

- 5.2.2. *Phased development will have a range and mix of housing types for each development phase.*
- 5.2.4. *To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*
  - *social housing or other publicly funded housing; or*
  - *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*



- 5.2.5. *The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

We object to the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental tenure. The requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. We object to policy statements that phased developments include a range and mix of housing types and the policy statement that 50% of new housing units be larger, family-sized or two and three-bedroom units. While we understand the intent of the policies is to encourage developments that enable housing choice, including for families, the policies as written are prohibitive and will challenge the delivery of needed housing units overall and should be considered on a site-specific basis.

### Complete Streets

We continue to object to the City's application and open-ended interpretation of how and to what extent road widenings and land conveyances can be secured and applied to development applications. New Policy 7.3.2.3 continues to provide only a general and overarching policy as to what can be secured:

*7.3.2.3 The City's multi-modal transportation network will be maintained and developed to support the policies of this Plan by:*

*b. designated right-of-way widths are considered the basic required rights-of-way along street sections. At intersections, grade separations or major physical topographical constraints, wider rights-of-way may be required to accommodate necessary features such as embankments, auxiliary lanes, additional pavement or sidewalk widths, transit facilities, cycling facilities or to provide for necessary improvements for safety in certain locations;*

The application and interpretation of this policy is inappropriate and as such we formally object to its inclusion in the draft Official Plan.

### Well Designed Healthy Communities

A new urban design-related policy framework is proposed and presented in Chapter 8, Well Designed Healthy Communities. We object to all overarching policies that stipulate urban design and building requirements. Urban design guidelines should be applied to a local area or on a site-specific basis.

Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

- 8.4.1.17. *Built form will relate to the width of the street right-of-way.*
- 8.4.5.2. *Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.*
- 8.6.2.5. *Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.*

The requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location.

We object to policy statements that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards as City Standards for public open spaces do not always reflect site-specific redevelopment objectives and requirements. Provision of any POPS should be a collaborative effort between the parties involved.

We object to the introduction of urban design related policy or guidelines in the draft Official Plan including but not limited to any angular plane, views and vistas and separation distance requirements. Urban design objectives should continue to be implemented through an Urban Design Guideline document or Built Form Standard specific and appropriate to an area context. Urban design guidelines are the appropriate mechanism to facilitate the City's urban design objectives.

### Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designation application to the subject lands and assigned to Protected MTSA (PMTSA) are illustrated on draft Schedule 8. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10 and on Schedule 7 – Land Use Designations, which does not illustrate the Downtown Mixed Use designation category.

Additionally, the policy framework presented by Policies 11.3.2 and 11.3.3 which provides that development on Downtown Mixed Use designated lands which results in a loss of non-residential floor space will not be permitted unless the planned function of the non-residential component will be maintained or replaced as part of redevelopment. As stated above, we object to the policy requirements for replacement or increases of non-residential area as this objective needs to be considered on a site-specific and development specific basis.

### Schedules and Mapping, Relationship to the Public Realm

On draft Map 12-2.3, a future park site on the western edge of the subject lands is illustrated. We object to the illustration of a park in this location and it should be removed on the next iteration of the draft Official Plan.

On draft Map 12-2.7 – Downtown Core A & B Street Frontage, New Street and Webb Drive, adjacent to the subject lands are illustrated to be B Streets while Burnhamthorpe Road West and Kariya Drive are illustrated to be A Streets. We object to all policies that stipulate access, entrance or built form restrictions to either an A or B Street. A & B Street policies needs to reflect existing circumstances and on a site-specific basis where the A & B Street policy requirements cannot be met. Deviations in design that address access, emergency access, site access and built form considerations that may arise through site-specific design and when the entirety of the Official Plan is taken into consideration.

On draft Map 12-2.8 – Downtown Core Retail Activation, requirements for at-grade retail uses for building frontages on retail activation streets are stipulated. Creating an exact percentage of a development to contain retail uses has proven to be problematic and is overly restrictive when considering a redevelopment application holistically and where other opportunities exist to provide retail components on other streets, internal to the development or above grade. We object to the City's continued inclusion of the retail activation policies in the draft Official Plan. Further, Policy 12.2.9.12 restricts the uses allowed within the retail activation frontages and only includes use financial institution, service establishment restaurant and retail store. Restricting the uses to a narrow band of retail-related uses will prove to be problematic when considering the evolving commercial and retail environments. We object to the City's continued inclusion of the retail activation policies and mapping in the draft Official Plan.

Policies 12.2.8.21 a-d. provide for requirements for above-grade parking structures and suggest that integrated above-grade parking structures will not directly front on to public streets and that they are required to have active or retail uses on the ground floor. We object to this policy requirement as the design of a podium or above grade parking structure should be developed on a site-specific basis and in consideration for existing constraints and opportunities.

Lastly, on Figure 12.5, an illustration provides for how podium and stepbacks are to be designed and provides for an angular plane and stepping requirements on a streetwall through build-to lines. We object to this requirement being imposed on the subject lands as existing buildings or redevelopment in an already constrained area may not be able to achieve these objectives specifically and as illustrated on draft Figure 12.5.

### Glossary and Implementation

The draft Official Plan contains a refined glossary of key terms in Chapter 18. Of particular concern is the refined definition of the term “compatible”. Chapter 18-4 of the draft Official Plan states the term compatible is to be defined as follows:

*“means development that enhances the site and surrounding area without introducing unacceptable adverse impacts. Evaluating impacts includes considering contextually relevant matters such as land use, massing, scale, the environment, health, safety, noise, vibration, dust, odours, traffic, sunlight, shadow and wind. Compatible should not be narrowly interpreted to mean “the same as” or “being similar to”.”*



We object to the revised definition of compatible. As written, this definition does not adequately capture that compatibility can be interpreted in a variety of ways, however, compatible development does not require that existing conditions be replicated but rather a development can differ from existing development without creating unacceptable adverse impacts. The proposed definition can be narrowly interpreted and may result in a greater range of aspects to be considered in the evaluation of whether a development can be understood to be compatible. Furthermore, the term compatible is a term that is used extensively throughout the draft Official Plan and in sections relating to the Downtown Core.

The draft Official Plan provides for new language (Policy 17.6) relating to the implementation and use of a Holding symbol to address specific requirements. We note and specifically object to the City's application of the word "provision of" whereas the current and in-force Official Plan provides that the "adequacy of" requirements be implemented prior to a Holding symbol being lifted. Use of the word "provision" suggests that all of the requirements listed will be required in an application to lift the Holding symbol, regardless of their necessity on a site-specific basis.

#### Summary

In summary, we object to the proposed policy and revisions outlined in the draft Official Plan. Given any development application must consider and conform with the Mississauga Official Plan in its totality, it is our opinion that many of the proposed policies are overly and unnecessarily restrictive and not appropriate to context or for the subject lands. Please continue to include GSAI in the Official Plan review initiative and any future updates, meetings and timelines to review and provide comments on new iterations the draft Official Plan prior to adoption.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



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Bruce McCall-Richmond, MCIP, RPP  
Senior Associate

cc. Ben Phillips, Project Manager, Official Plan Review

# **Stikeman Elliott**

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March 15, 2024  
File No.: 146656.1001

**By E-mail**  
***angie.melo@mississauga.ca***

Planning & Development Committee  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

Attention: Ms. Angie Melo, Legislative Coordinator

Dear Sirs/Mesdames:

**Re: CD.02-MIS - Agenda Item No. 6.4**  
**Public Meeting (All Wards) – Proposed Mississauga Official Plan 2051**  
**Letter of Concern**

We are counsel to BET Realty Limited and 3420 Hurontario Street Incorporated, the owners of the lands municipally known as 3420 & 3442 Hurontario Street, Mississauga (the “**Property**”).

Our client and its consultant team are reviewing the latest version of the draft Mississauga Official Plan 2051 (the “**Draft OP**”), which is appended to the staff report, dated March 6, 2024, being the subject of consideration under the above-captioned agenda item. While our review of the Draft OP is still underway, we wish to provide the Committee with the following comments, particularly in relation to the Property.

The Property is located at the southwest corner of Hurontario Street and Central Parkway West. On June 5, 2023, the Ontario Land Tribunal issued its decision in Case No. OLT-21-001693 (the “**OLT Decision**”) upon considering a settlement advanced by our client and the City. Through the OLT Decision, the Tribunal approved amendments to the City of Mississauga Official Plan and Zoning By-law No. 0225-2007, with the effect of permitting the Property to be redeveloped with two mixed-use tall buildings with heights of up to 33 and 30 storeys.

For reference, enclosed with this letter is a copy of the OLT Decision, as well as Council Resolution No. 0031-2023, dated February 1, 2023, through which our client’s settlement offer was accepted by City Council.

## **The Draft OP fails to reflect the settlement with the City and the amendments introduced through the OLT Decision.**

Most significantly, Schedule 8k of the Draft OP—which establishes the boundaries, permitted land uses, and maximum building heights within the Fairview Protected Major Transit Station Area—shows the Property as split-designated “Residential High Density” and “Office”, with building height permissions of 3 to 25 storeys. By contrast, the OLT Decision approved an Official Plan Amendment redesignating the entirety of the Property as “Residential High Density”, with express permissions for “two apartment dwellings with maximum heights of 33 and 30 storeys”. Schedule 8k is also internally inconsistent with other sections in the Draft OP—in particular, Schedule 7, which designates the entirety of the Property as “Residential High-Rise”, as well as the policies for Special Site 106 (Policies 16.106.1 through 16.106.3),

which apply to the Property and are generally reflective of the permissions granted through the OLT Decision.

Our expectation is that City staff will correct these errors in the Draft OP to accurately reflect the OLT Decision, so as to avoid an appeal or court challenge of the proposed new Official Plan.

Our client is also concerned with other aspects of the Draft OP, as summarily described in the letter prepared by our client's planning consultant, Glen Schnarr & Associates Inc., a copy of which is enclosed with this letter.

We welcome the opportunity to discuss these and other concerns with City staff, particularly as the City continues with its consultation process and as we complete our review of the Draft OP. If you have any questions or require additional information, please contact me or my associate, Jonathan Cheng, at (416) 869-6807 or [jcheng@stikeman.com](mailto:jcheng@stikeman.com).

Please provide us with notice of all upcoming meetings of Council and Committees of Council at which this matter will be considered, and we ask to be provided with notice of the Committee's and Council's decision with respect to this and any related item.

Thank you for your attention to this matter.

Yours truly,



Calvin Lantz

CL/jsc  
Enclosures

cc. Jonathan S. Cheng, *Stikeman Elliott LLP*  
Jim Levac, *Glen Schnarr & Associates Inc.*  
Lia Magi, *City of Mississauga*  
Client



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**Ontario Land Tribunal**  
Tribunal ontarien de l'aménagement  
du territoire



**ISSUE DATE:** June 05, 2023

**CASE NO(S).:**

OLT-21-001693

**PROCEEDING COMMENCED UNDER** subsection 22(7) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Applicant and Appellant:	BET Realty Limited and 3420 Hurontario Street Incorporated
Subject:	Request to amend the Official Plan - Failure of City of Mississauga to adopt the requested amendment
Existing Designation:	Residential High Density” and “Office”
Proposed Designated:	Residential High Density – Special Site
Purpose:	To permit residential, retail and office uses
Property Address/Description:	3420 and 3442 Hurontario Street
Municipality:	City of Mississauga
Approval Authority File No.:	OZ 20/022 W7
OLT Case No.:	OLT-21-001693
OLT Lead Case No.:	OLT-21-001693
OLT Case Name:	BET Realty Limited v. Mississauga (City)

**PROCEEDING COMMENCED UNDER** subsection 34(11) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Applicant and Appellant:	BET Realty Limited and 3420 Hurontario Street Incorporated
Subject:	Application to amend - Zoning Bylaw 0225-2007, as amended and neglect of City of Mississauga to make a decision
Existing Zoning:	“RA-3-20 – Residential Apartment 3 Zone Exception 20” and “0-10” – Office Exception Zone 10”
Proposed Zoning:	“RA5-XX”
Purpose:	To permit residential, retail and office use
Property Address/Description:	3420 and 3442 Hurontario Street
Municipality:	City of Mississauga
Municipality File No.:	OZ 20/022 W7
OLT Case No.:	OLT-21-001694
OLT Lead Case No.:	OLT-21-001693

**Heard:** March 27, 2023 by Video Hearing

**APPEARANCES:**

**Parties**

BET Realty Ltd. & 3420 Hurontario  
Street Inc.

City of Mississauga

**Counsel**

Jonathon Cheng

Lia Magi

**DECISION DELIVERED BY KURTIS SMITH AND K.R. ANDREWS AND ORDER OF  
THE TRIBUNAL**

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[Link to Final Order](#)

**INTRODUCTION**

[1] This is a Settlement Hearing with respect to an appeal filed by BET Realty Ltd. & 3420 Hurontario Street Inc. (“Appellants”) regarding the failure of the City of Mississauga (“City”) to make a decision within the timeframe prescribed in the *Planning Act* (“Act”). The subject Applications concern proposed Official Plan (“OPA”) and Zoning By-law (“ZBA”) amendments relating to the property municipally known as 3420 & 3442 Hurontario Street (“Subject Property”).

[2] The Subject Property is a rectangular shaped parcel, 1.61 acres in size, located at the southwest corner of Hurontario Street and Central Parkway West. Currently there is a 3-storey medical office building at the south end of the site with a large parking field in front of the building extending north to Central Parkway West. Vehicular access is available via a restricted right-in/right-out access from Hurontario Street and a full moves access from Central Parkway West.

[3] The original proposed development was designed to build two high-rise towers, 30 and 36 storeys atop a five (5) storey shared podium. The total gross floor area (“GFA”) was 48,435 square metres with 680 residential units and a total floor space

index ("FSI") of 7.4.

[4] Following two Case Management Conferences, a settlement was reached as a result of two (2) days of Tribunal led mediation.

## HEARING

[5] To support the proposal, the sole witness called was Jim Levac, a land use planner who, upon review of his *Curriculum Vitae* and Acknowledgement of Expert's Duty form, was qualified by the Tribunal to provide opinion evidence in land use planning.

[6] Mr. Levac explained that the revised proposal addresses the comments and concerns of the City and community, which includes a reduction in the tower heights to 33 storeys (106 m) and 30 storeys (97.5 m) and altered the structures design to create a preferred transition.

[7] Mr. Levac reviewed the Act with regard to the matters of provincial interest set out in section 2. Specifically, he opined that the proposal would achieve the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems (s. 2.f), the orderly development of safe and healthy communities (s. 2.h), the adequate provision and distribution of educational, health, social, cultural and recreational facilities (s.2.i), the protection of public health and safety (s.2.o), and the appropriate location of growth and development (s.2.p).

[8] As it relates to the Provincial Policy Statement 2020 ("PPS"), Mr. Levac opined that the proposed development is consistent with PPS policy objectives, including healthy, livable and safe communities that are sustained by promoting efficient development and land use patterns and avoiding development and land use patterns which may cause environmental or public health and safety concerns. In his opinion, the revised proposed OPA and ZBA are consistent with sections 1.1.1.e, 1.1.3.1, 1.1.3.2, 1.1.3.2.f, 1.1.3.3, and 1.1.3.4 of the PPS.



[9] In Mr. Levac's opinion, the proposed instruments will permit development in compact form, while maximizing existing under-utilized lands in a built-up settlement area which maximizes existing infrastructure and promotes efficient land use and development patterns. Additionally, the proposed development will promote transit use along a major transit and intensification corridor.

[10] Mr. Levac is further of the opinion that the proposed development conforms with the Growth Plan for the Greater Golden Horseshoe ("Growth Plan") as it supports the achievement of complete communities designed to support healthy and active living and to meet people's needs for daily living (s 1.2.1), directs growth to settlement areas that have a delineated built boundary, have existing or planned municipal water and wastewater systems (s 2.2.1), and the proposed development represents a form of intensification within the delineated built-up area, and prioritizes infrastructure that supports intensification (s 2.2.2.3).

[11] Mr. Levac testified that the Subject Property is part of the Downtown Mississauga Urban Growth Centre as identified in s.2.2.3.2.b of the Growth Plan. Additionally, the Subject Property is situated within an area planned to support significant population and employment growth and be a focal area for transit (s.2.2.3.1).

[12] Mr. Levac also testified that s.2.2.4 of the Growth Plan states that the Subject Property is within a designated protected Major Transit Station Area (MTSA) in the Region of Peel Official Plan ("Region OP") and is similarly proposed for a protected MTSA designation in the Mississauga Official Plan ("City OP"). The Downtown Fairview protected MTSA is directly located on the Hurontario LRT line and is able to maximize the area and number of potential transit users within walking distance. s.5.6.19 of the Region OP contains the Region's MTSA policies which apply to the subject lands and promote higher densities to support funded and planned transit infrastructure.

[13] The Region OP designates the Subject Property as Urban System. In Mr. Levac's opinion, the proposed development supports the designation of the Region OP as it is compact, transit supportive intensification in an area that efficiently utilizes land,

services, infrastructure and public finances while respecting the character of existing communities.

[14] The City OP provides a number of policies that relate to the City encouraging compact mixed-use development that is transit supportive. Mr. Levac testified that the Subject Property is within the “Downtown”. The Downtown area is directed to be a focal point for growth and density and support higher order transit. Furthermore, the City OP identifies “Corridor” policies which are meant to evolve to attract mixed use development while becoming public places as part of the broader public realm. Corridors within Downtown areas are identified as Intensification Corridors which will be supported by high order public transit, namely the Hurontario LRT, and support mixed uses and higher residential densities while providing appropriate transition of height and density.

[15] Mr. Levac summarily concluded that the proposed OPA and ZBA are consistent with the PPS, conform with the Growth Plan, Region OP and City OP, have sufficient regard for matters of provincial interest under s.2, and represent good land use planning.

## **FINDINGS**

[16] The Tribunal accepts the uncontroverted planning evidence and opinions of Mr. Levac and is satisfied that the proposed OPA and ZBA are consistent with the PPS, and conform with the Growth Plan, Region OP and City OP. The Tribunal is satisfied that the proposed development represents good planning in the public interest and has appropriate regard for matters of Provincial interest, specifically as the development is designed to be sustainable, to support public transit and to be oriented to pedestrians.

**ORDER**

[17] **THE TRIBUNAL ORDERS** that:

1. The appeal is allowed in part and the Official Plan for the City of Mississauga is amended as set out in Attachment 1 to this Order; and
2. The appeal is allowed in part, and By-law 0225-2007 is hereby amended as set out in Attachment 2 to this Order. The Tribunal authorizes the municipal clerk of City of Mississauga to assign a number to this by-law for record keeping purposes.

*"Kurtis Smith"*

KURTIS SMITH  
MEMBER

*"K.R. Andrews"*

K.R. ANDREWS  
MEMBER

**Ontario Land Tribunal**

Website: [olt.gov.on.ca](http://olt.gov.on.ca) Telephone: 416-212-6349 Toll Free: 1-866-448-2248

The Conservation Review Board, the Environmental Review Tribunal, the Local Planning Appeal Tribunal and the Mining and Lands Tribunal are amalgamated and continued as the Ontario Land Tribunal ("Tribunal"). Any reference to the preceding tribunals or the former Ontario Municipal Board is deemed to be a reference to the Tribunal.



## **ATTACHMENT 1 – OPA**

**Amendment No. 155**

**to**

**Mississauga Official Plan**

The following text and Map "A" attached constitute Amendment No. 155.

**PURPOSE**

The purpose of this Amendment is to change the land use designation of the subject lands from Office to Residential High Density and to amend Special Site 2 in the Downtown Fairview Character Area.

**LOCATION**

The lands affected by this Amendment are located on the west side of Hurontrario Street, south of Central Parkway West. The subject lands are located in the Downtown Fairview Character Area, as identified in Mississauga Official Plan.

**BASIS**

Mississauga Official Plan came into effect on November 14, 2012, save and except for the outstanding site specific appeals to the Ontario Land Tribunal.

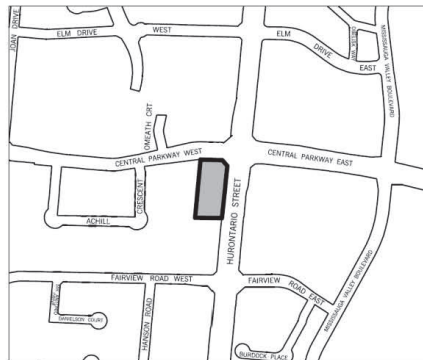
The subject lands are currently designated Residential High Density and Office and are within an area of Special Site Policies. The Residential High Density designation permits apartment dwelling, townhouse dwelling accessory to apartment dwelling and convenience commercial uses at grade in apartment dwellings. The Office designation permits major office, secondary office and accessory uses. Special Site 2 policies apply to a portion of the subject lands and permit a maximum of 135 units and a maximum floor space index of 3.75.

The proposed Amendment is required to re-designate a portion of the subject lands from Office to Residential High Density and to amend the Special Site Policies to permit two apartment dwellings with heights of 33 and 30 storeys.

#### DETAILS OF THE AMENDMENT AND POLICIES RELATIVE THERETO

1. Section 12.3, Downtown Fairview Character Area, of Mississauga Official Plan, is hereby amended by removing the floor space index (FSI) range from the subject lands on Map 12-3: Downtown Fairview Character Area.
2. Section 12.3.2, Special Site Policies, Downtown Fairview Character Area, of Mississauga Official Plan, is hereby amended by deleting Special Site 2 and replacing with the following:

##### 12.3.2.2 Site 2



12.3.2.2.1 The lands identified as Special Site 2 are located on the west side of Hurontario Street, south of Central Parkway West.

12.3.2.2.2 Notwithstanding the policies of this Plan, two apartment dwellings with maximum heights of 33 and 30 storeys will be permitted.

12.3.2.2.3 Notwithstanding the policies of this Plan, a maximum ***floor space index (FSI)*** of 7.6 will be permitted.

3. Schedule 10, Land Use Designations, of the Mississauga Official Plan, is hereby amended by changing the land use designation of a portion of the subject lands from Office to Residential High Density, as shown on Map "A" of this Amendment.

**IMPLEMENTATION**

Upon receipt of the Ontario Land Tribunal's Final Order, Mississauga Official Plan will be amended in accordance with the Order.

The lands will be rezoned as part of the same Tribunal Order.

This Amendment has been prepared based on the Office Consolidation of Mississauga Official Plan dated March 3, 2023.

**INTERPRETATION**

The provisions of Mississauga Official Plan, as amended from time to time regarding the interpretation of that Plan, will apply in regard to this Amendment.

This Amendment supplements the intent and policies of Mississauga Official Plan.





## ATTACHMENT 2 – ZBA

1. By-law Number 0225-2007, as amended, being a City of Mississauga Zoning By-law, is amended by adding the following Exception Table:

4.15.6.61	Exception: RA5-61	Map # 22	By-law:
In a RA5-61 zone the permitted uses and applicable regulations shall be as specified for a RA5 zone except that the following uses/regulations shall apply:			
<b>Additional Permitted Uses</b>			
4.15.6.61.1	(1) Retail Store (2) Restaurant (3) Take-out Restaurant (4) Service Establishment (5) Financial Institution (6) Medical Office (7) Office		
<b>Regulations</b>			
4.15.6.61.2	The provisions of Lines 1.0 and 3.0 contained in Table 2.1.2.1.1, Subsections 2.1.14, 2.1.30 and Article 4.1.15.1 and the regulations of Lines 15.1, 15.2, 15.5 and 15.6 contained in Table 4.15.1 of this By-law shall not apply		
4.15.6.61.3	A <b>dwelling unit</b> shall not be permitted on the <b>first storey</b>		
4.15.6.61.4	The <b>uses</b> contained in Sentence 4.15.6.61.1 of this Exception shall not be permitted above the <b>third storey</b>		
4.15.6.61.5	The <b>uses</b> contained in Sentence 4.15.6.61.1 of this Exception shall only be located within a <b>building, structure</b> or part thereof used for an <b>apartment, long-term care building, retirement building</b> or any combination thereof		

4.15.6.61	Exception: RA5-61	Map # 22	By-law:
4.15.6.61.6	Maximum floor space index - apartment zone		7.6
4.15.6.61.7	Minimum gross floor area - non-residential used for medical office and office		1 790 m <sup>2</sup>
4.15.6.61.8	Maximum gross floor area - apartment zone per storey for each storey above nine storeys		750 m <sup>2</sup>
4.15.6.61.9	Minimum number of resident parking spaces per dwelling unit		0.8
4.15.6.61.10	Minimum number of visitor parking spaces per dwelling unit		0.2
4.15.6.61.11	Minimum number of accessible parking spaces		5
4.15.6.61.12	Minimum number of bicycle parking spaces - Class B		0
4.15.6.61.13	Minimum number of parking spaces per 100 m <sup>2</sup> of gross floor area - non-residential for uses contained in Sentence 4.15.6.61.1 of this Exception		3.8
4.15.6.61.14	<p>For the visitor component, a shared parking arrangement may be used for the calculation of required residential visitor/non-residential parking in accordance with the following:</p> <p>the greater of</p> <p>0.2 visitor parking spaces per dwelling unit</p> <p>or</p> <p>Parking required for all non-residential uses, except for restaurant over 220 m<sup>2</sup> gross floor area - non-residential</p> <p>Parking for restaurant over 220 m<sup>2</sup> gross floor area - non-residential, shall not be included in the above shared parking arrangement and shall be provided in accordance with applicable regulations contained in Table 3.1.2.2 of this By-law</p>		
4.15.6.61.15	Minimum amenity area		4.5 m <sup>2</sup> per dwelling unit

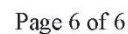
4.15.6.61	Exception: RA5-61	Map # 22	By-law:
4.15.6.61.16	All site development plans shall comply with Schedule RA5-61 of this Exception		
<b>Holding Provision</b>			
<p>The holding symbol H is to be removed from the whole or any part of the lands zoned H-RA5-61 by further amendment to Map 22 of Schedule B contained in Part 13 of this By-law, as amended, upon satisfaction of the following requirements:</p> <ol style="list-style-type: none"><li>(1) delivery of an executed Development Agreement with Municipal Infrastructure and Streetscape Schedules in a form and on terms satisfactory to the City of Mississauga ("City");</li><li>(2) delivery of a Temporary Discharge to Storm Sewer Commitment Letter to the satisfaction of the City's Transportation and Works Department</li><li>(3) delivery of a Confirmation Letter from an Engineer that the above-ground storage tanks, wells and septic tanks have been removed to the satisfaction of the City's Transportation and Works Department;</li><li>(4) delivery of a Record of Site Condition, together with all supporting documentation to the satisfaction of the City's Transportation and Works Department;</li><li>(5) delivery of an updated Hydrogeological Study to the satisfaction of the City's Transportation and Works Department;</li><li>(6) delivery of updated engineering drawings to the satisfaction of the City's Transportation and Works Department;</li><li>(7) confirmation by Metrolinx/Mobilinx regarding grading and municipal boulevard works, including the amended boulevard treatment for the Hurontario Street frontage and bus stop maintenance or relocation, as the case may be.</li></ol>			



2. Map Number 22 of Schedule "B" to By-law Number 0225-2007, as amended, being a City of Mississauga Zoning By-law, is amended by changing thereon from "RA3-20" and "O1-10" to "H-RA5-61", the zoning of Part of Lot 16, Concession 1, North of Dundas Street, in the City of Mississauga, PROVIDED HOWEVER THAT the "H-RA5-61" zoning shall only apply to the lands which are shown on the attached Schedule "A", which is deemed to be an integral part of this By-law, outlined in the heaviest broken line with the "H-RA5-61" zoning indicated thereon.
3. This By-law shall not come into force until Mississauga Official Plan Amendment Number 155 is in full force and effect.

[http://teamsites.mississauga.ca/sites/18/Bylaws/OZ 20 022 W7.by-law OLT.ad.jmcc.docx](http://teamsites.mississauga.ca/sites/18/Bylaws/OZ%20022%20W7.by-law%20OLT.ad.jmcc.docx)







MISSISSAUGA

RESOLUTION NO.: 0031-2023

Page 1 of 6.5

Date: February 1, 2023

Moved by:

Seconded by:

1. That Council consent to the proposed settlement of the Ontario Land Tribunal appeal pertaining to 3420 & 3442 Hurontario Street, consistent with the terms outlined in Corporate Report "Instructions on a proposed settlement of the appeal to the Ontario Land Tribunal by BET Realty Limited and 3420 Hurontario Street Incorporated for a non-decision of the Official Plan Amendment and Zoning By-law Amendment applications with respect to the lands located at 3420 & 3442 Hurontario Street, (Ward 7)".
2. That the City Solicitor, or her designate, be authorized to execute Minutes of Settlement and take such additional steps required to complete and implement the proposed settlement of the Ontario Land Tribunal appeal relating to 3420 & 3442 Hurontario Street with the assistance of such City staff or consultants as may be appropriate.
3. That the Commissioner of Planning and Building and the City Clerk be authorized to execute any documents which may be required to complete and implement the settlement, other than Minutes of Settlement.

Recorded Vote	YES	NO	ABSENT	ABSTAIN
Mayor B. Crombie	✓			
Councillor S. Dasko	✓			
Councillor A. Tedjo	✓			
Councillor C. Fonseca	✓			
Councillor J. Kovac	✓			
Councillor C. Parrish			✓	
Councillor J. Horneck	✓			
Councillor D. Damerla	✓			
Councillor M. Mahoney	✓			
Councillor M. Reid	✓			
Councillor S. McFadden	✓			
Councillor B. Butt	✓			

Carried  
BC  
Mayor



March 15, 2024

GSAI File: 1166-001

(Via Email)

Chairman and Members of the Planning and Development Committee

c/o Angie Melo

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
BET Realty Ltd., 3420 Hurontario Street Incorporated  
3420, 3440 Hurontario Street, City of Mississauga

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Glen Schnarr and Associates Inc (GSAI) are the planning consultants to BET Realty Ltd. and 3420 Hurontario Street Incorporated (the "Owner") of the lands municipally known as 3420 and 3440 Hurontario Street, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the west side of Hurontario Street, south of Central Parkway West. The Site is currently occupied by a commercial structure and surface parking areas. Based on the in-effect planning policy framework, the Site is located within the Downtown Fairview Character Area, within the Downtown Mississauga Urban Growth Centre, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the Fairview Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Residential High Density' (in accordance with Mississauga Official Plan Amendment 155). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, mixed-use, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being immediately adjacent to the Hazel McCallion Light Rail Transit ('LRT') network and within 300 metres of various street-level transit services. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Downtown Fairview as a vibrant, complete, 15-minute community.

By way of background, we highlight that the Subject Lands are subject to an active development approval. More specifically, the Site is subject to an active Site Plan Approval ('SPA') application (City File No. SP-22-114 W7)

which will further implement the development vision for the Site. Overall, the SPA application will facilitate the Site to be redeveloped for a compact, mixed-use development comprised of two high-rise structures of varying height. The SPA application will also further implement the previous site-specific Official Plan Amendment and Zoning By-law Amendment applications.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 12 (Urban Growth Centre), 16 (Special Sites) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

In accordance with the in-effect Provincial and Regional policy frameworks, the Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, thereby removing reference to housing type.

'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:

- social housing or other publicly funded housing; or
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased to a 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase "encouraged". The re-phrasing and use of the word "encourage" is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (20% or less) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain unit type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'

Table 5.1 – Peel-Wide New Housing Unit Targets

Target Area	Targets
Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households
Rental	That 25% of all new housing units are rental tenure
Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted

nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. It can also challenge the implementation of development, particularly when development fronts onto private streets which often have reduced ROW widths. For the reasons outlined above, this policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.



*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. In our opinion, the 45 degree angular plane requirement should be removed from the above-noted policy.

#### Chapter 10: Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated.

In the case of the Subject Lands, Schedule 7 has re-designated the Subject Lands from 'Residential High Density' to 'Residential High-Rise'. This designation is supported and is consistent with the designation applied to the Site via Mississauga Official Plan Amendment 155. We highlight that while the designation on Schedule 7 is appropriate and should be carried forward, the designation indicated is inconsistent with the land use designation applied by Schedule 8. This discrepancy is concerning and requires modification.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8k, the Subject Lands are identified as being located within the Fairview Protected Major Transit Station Area (PMTSA), as being designated 'Residential High Density' and 'Office' and as having a maximum building height permission of 25 storeys. While we support the inclusion of the Subject Lands within the Fairview PMTSA given the Site's locational attributes, the discrepancy in land use designations and permitted

building heights is concerning. We require that Schedule 8k be amended to accurately illustrate the Site's 'Residential High-Rise' designation and permitted maximum height of 33 storeys. This discrepancy is also concerning given the draft Official Plan states that the PMTSA framework is to prevail in the event of conflict.

#### Chapter 12: Urban Growth Centre:

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. In accordance with Chapter 12 as drafted, the Subject Lands are located within the Urban Growth Centre and the Hospital Character Area of the Urban Growth Centre.

Sections 12.1, 12.3 and 12.4 present a refined policy framework for lands within the Fairview Urban Growth Centre Character Area. We are concerned with the revised policy framework, including Policy 12.1.1.6 as stated below.

*'12.1.1.6. Proponents of development applications within the Urban Growth Centre may be required to demonstrate how new development contributes to a concentration and mix of jobs as a key component of a mixed use transit-supportive development.'*

The above-noted policy is restrictive and does not provide sufficient flexibility to accommodate evolving community contexts nor market trends. The requirement to demonstrate how a development contributes to a concentration of jobs may prevent implementation of the development concept, approved by City Council, on the Site. In our opinion, the above-noted policy requires modification to clearly identify how a concentration of jobs is to be defined and to provide greater flexibility for mixed-use developments to accommodate an appropriate, right-sized amount of non-residential uses.

#### Chapter 16: Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 16 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area policies. Of relevance to the Subject Lands, the Site is identified as being located within and subject to Special Site 106 (Downtown Fairview – UGC) and policies 16.106.1 through 16.106.3. Collectively, these policies recognize the approved development vision for the Site. We support Special Site 106 and Policies 16.106.1, 16.106.2 and 16.106.3 as drafted. We request that this policy be maintained.

#### **Conclusion**

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.



We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Jim Levac, MCIP, RPP

Partner

Stephanie Matveeva, MCIP, RPP

Associate

cc. Owner  
Councillor Damerla  
Ben Philips, Project Manager, Official Plan Review

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 1166-001

(Via Email)

Chairman and Members of the Planning and Development Committee

c/o Angie Melo

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
 BET Realty Ltd., 3420 Hurontario Street Incorporated  
 3420, 3440 Hurontario Street, City of Mississauga

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Glen Schnarr and Associates Inc (GSAI) are the planning consultants to BET Realty Ltd. and 3420 Hurontario Street Incorporated (the "Owner") of the lands municipally known as 3420 and 3440 Hurontario Street, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the west side of Hurontario Street, south of Central Parkway West. The Site is currently occupied by a commercial structure and surface parking areas. Based on the in-effect planning policy framework, the Site is located within the Downtown Fairview Character Area, within the Downtown Mississauga Urban Growth Centre, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the Fairview Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Residential High Density' (in accordance with Mississauga Official Plan Amendment 155). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, mixed-use, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being immediately adjacent to the Hazel McCallion Light Rail Transit ("LRT") network and within 300 metres of various street-level transit services. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Downtown Fairview as a vibrant, complete, 15-minute community.

By way of background, we highlight that the Subject Lands are subject to an active development approval. More specifically, the Site is subject to an active Site Plan Approval ("SPA") application (City File No. SP-22-114 W7)



which will further implement the development vision for the Site. Overall, the SPA application will facilitate the Site to be redeveloped for a compact, mixed-use development comprised of two high-rise structures of varying height. The SPA application will also further implement the previous site-specific Official Plan Amendment and Zoning By-law Amendment applications.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 12 (Urban Growth Centre), 16 (Special Sites) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

In accordance with the in-effect Provincial and Regional policy frameworks, the Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, thereby removing reference to housing type.

'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:

- social housing or other publicly funded housing; or
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased to a 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase "encouraged". The re-phrasing and use of the word "encourage" is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (20% or less) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain unit type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'

Table 5.1 – Peel-Wide New Housing Unit Targets

Target Area	Targets
Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households
Rental	That 25% of all new housing units are rental tenure
Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted

nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. It can also challenge the implementation of development, particularly when development fronts onto private streets which often have reduced ROW widths. For the reasons outlined above, this policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. In our opinion, the 45 degree angular plane requirement should be removed from the above-noted policy.

#### Chapter 10: Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated.

In the case of the Subject Lands, Schedule 7 has re-designated the Subject Lands from 'Residential High Density' to 'Residential High-Rise'. This designation is supported and is consistent with the designation applied to the Site via Mississauga Official Plan Amendment 155. We highlight that while the designation on Schedule 7 is appropriate and should be carried forward, the designation indicated is inconsistent with the land use designation applied by Schedule 8. This discrepancy is concerning and requires modification.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8k, the Subject Lands are identified as being located within the Fairview Protected Major Transit Station Area (PMTSA), as being designated 'Residential High Density' and 'Office' and as having a maximum building height permission of 25 storeys. While we support the inclusion of the Subject Lands within the Fairview PMTSA given the Site's locational attributes, the discrepancy in land use designations and permitted





building heights is concerning. We require that Schedule 8k be amended to accurately illustrate the Site's 'Residential High-Rise' designation and permitted maximum height of 33 storeys. This discrepancy is also concerning given the draft Official Plan states that the PMTSA framework is to prevail in the event of conflict.

#### Chapter 12: Urban Growth Centre:

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. In accordance with Chapter 12 as drafted, the Subject Lands are located within the Urban Growth Centre and the Hospital Character Area of the Urban Growth Centre.

Sections 12.1, 12.3 and 12.4 present a refined policy framework for lands within the Fairview Urban Growth Centre Character Area. We are concerned with the revised policy framework, including Policy 12.1.1.6 as stated below.

*'12.1.1.6. Proponents of development applications within the Urban Growth Centre may be required to demonstrate how new development contributes to a concentration and mix of jobs as a key component of a mixed use transit-supportive development.'*

The above-noted policy is restrictive and does not provide sufficient flexibility to accommodate evolving community contexts nor market trends. The requirement to demonstrate how a development contributes to a concentration of jobs may prevent implementation of the development concept, approved by City Council, on the Site. In our opinion, the above-noted policy requires modification to clearly identify how a concentration of jobs is to be defined and to provide greater flexibility for mixed-use developments to accommodate an appropriate, right-sized amount of non-residential uses.

#### Chapter 16: Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 16 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area policies. Of relevance to the Subject Lands, the Site is identified as being located within and subject to Special Site 106 (Downtown Fairview – UGC) and policies 16.106.1 through 16.106.3. Collectively, these policies recognize the approved development vision for the Site. We support Special Site 106 and Policies 16.106.1, 16.106.2 and 16.106.3 as drafted. We request that this policy be maintained.

#### **Conclusion**

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.



We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Jim Levac, MCIP, RPP

Partner

Stephanie Matveeva, MCIP, RPP

Associate

cc.      Owner  
         Councillor Damerla  
         Ben Philips, Project Manager, Official Plan Review

March 15, 2024

Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L5B 3C1

**Re: Proposed City of Mississauga Official Plan (New OP)**

To Whom It May Concern,

We are planning consultants for SmartCentres REIT, who are the owners of the properties known as 3155 Argentia Road (SmartCentres Meadowvale), 1100 Burnhamthorpe Road, and 780 Burnhamthorpe Road in the City of Mississauga (the “SmartCentres Sites” or the “Sites”).

Since November 2021, SmartCentres has been working with City of Mississauga and Region of Peel Staff through the Employment Sites Review (ESR) study to assess the merits of conversion for the three sites listed above.

We have reviewed the Draft Mississauga Official Plan 2051 (“Draft MOP [Mississauga Official Plan]”) to understand how the new refined policy framework enables or limits the uses that are envisioned by SmartCentres and were supported by City Staff through the recommendations of the ESR study. We are writing to provide comments related to the latest Draft MOP, which was released by City Staff for comment and a final round of engagement in February 2024.

We have comments related to the policy direction of the Draft MOP, specifically related to policies impacting existing retail uses and the potential for their redevelopment. Our key concerns are summarized below.

**SmartCentres Meadowvale** is a large 25.6-hectare site with existing retail uses in north-west Mississauga. A partial conversion of the site was assessed through the ESR study, with the remainder of the lands remaining within Employment Areas. Regional Council has approved the conversion of 12.6 hectares of land to mixed use (in principle), subject to the Region’s forthcoming Land Needs Assessment in April 2024, while maintaining retail uses on the remaining 13 hectares of land.

**Overarching Comments:**

- **City Staff should consider the redesignation of the Meadowvale lands to “Community Node” (on Schedule 1), and “Mixed Use” (on Schedule 7)**
- **MOP policies should not prohibit major retail or require a 1:1 non-residential replacement when the site redevelops**

**1100 Burnhamthorpe** is a 4.5-hectare site with existing retail uses in central Mississauga. The site was recommended for a partial conversion by City Staff through the ESR study. Regional Council has approved the conversion to allow a mix of uses on the western portion of the site, while maintaining non-residential uses on the eastern portion of the site.

**Overarching Comment:**

- **City Staff should consider the redesignation of the 1100 Burnhamthorpe lands to “Community Node (on Schedule 1)”, and “Mixed Use” (on Schedule 7)**
- **MOP policies should not prohibit major retail or require a 1:1 non-residential replacement when the site redevelops**

**780 Burnhamthorpe** is a 4.4-hectare site with existing retail uses in central Mississauga. City Staff did not support the conversion of the site.

**Overarching Comment:**

- **City Staff should consider maintaining the 780 Burnhamthorpe lands as “Mixed Use Limited” (on Schedule 7)**
- **MOP policies should not prohibit major retail or require a 1:1 non-residential replacement when the site redevelops**

The sections that follow provide greater detail. It highlights the relevant policies of concern; provides commentary based on the impacts to the SmartCentres Sites and the implementation of the recommendations from the ESR study; and suggests alternative language to the policies of the Draft MOP highlighted in this letter. This letter provides comment relating to the following three areas:

- Draft MOP Schedules;
- Major Retail Permissions;
- Non-Residential Replacement; and,
- Business and Job Policies.

## **1) Draft MOP Schedules**

### **City Structure and Land Use Designations**

Schedule 1 – City Structure of the Draft MOP shows that the three SmartCentres sites are located within an Employment Area (see Figure 1).



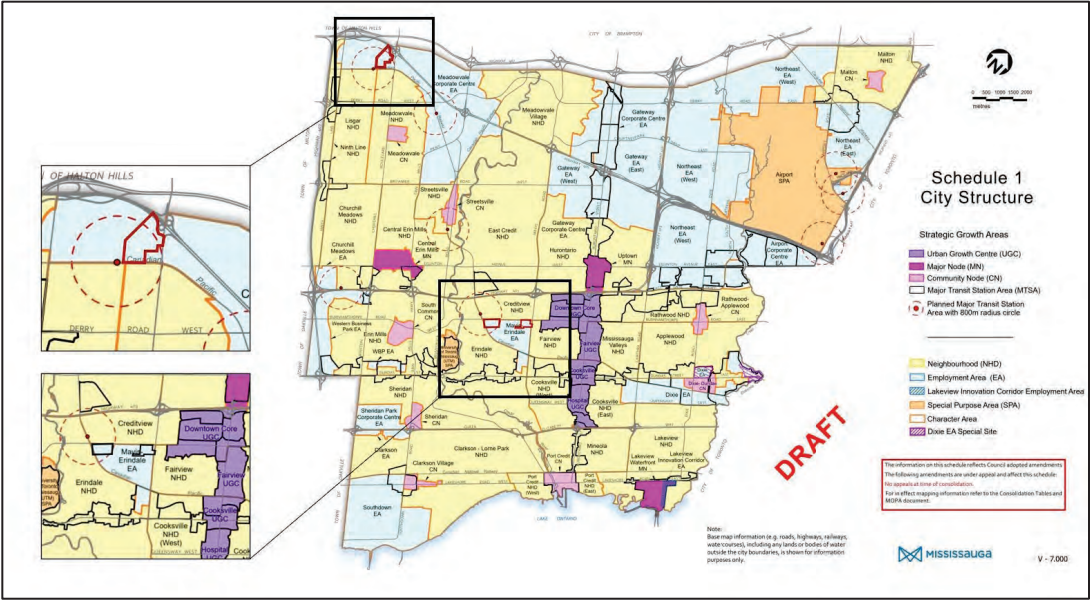


Figure 1. Location of the SmartCentres Sites within Draft MOP Schedule 1 - City Structure

Schedule 7 – Land Use Designations shows all three sites as located within the Employment Commercial designation (see Figure 2).

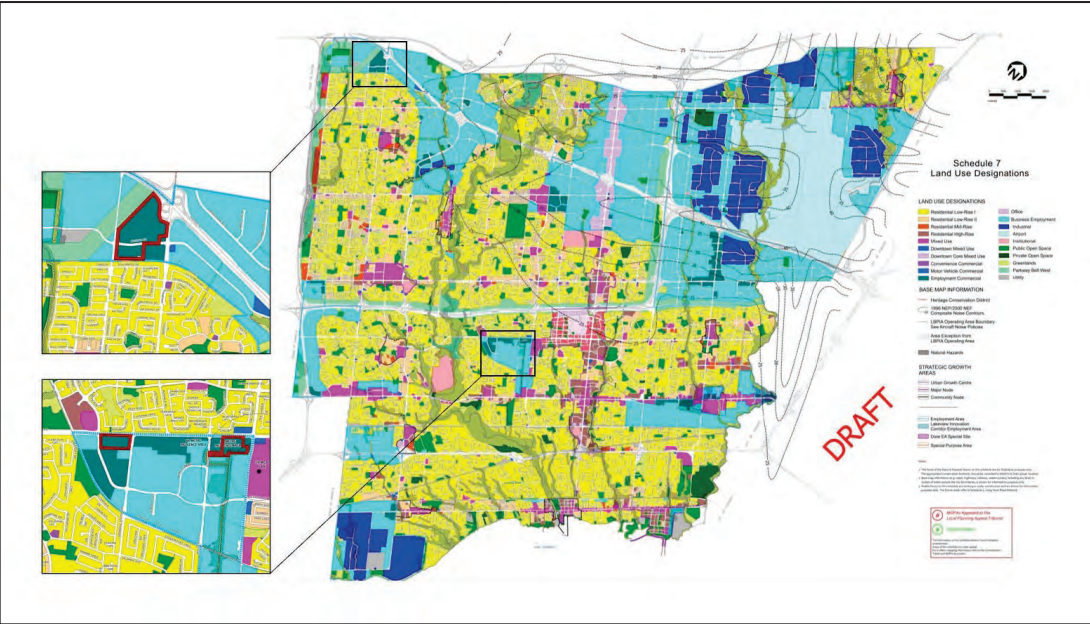


Figure 2. Location of the SmartCentres Sites within Draft MOP Schedule 7 - Land Use Designations

Despite City and Regional Council support to intensify the Sites and permit non-employment uses, including sensitive land uses such as residential, Schedule 1 and 7 of the Draft MOP continue to show the SmartCentres Meadowvale and 1100 Burnhamthorpe sites as located within an Employment Area and with an Employment Commercial land use. Additionally, the current and in-effect Official Plan show that the three sites are located within the Mixed Use land use designation. Sites designated Mixed Use and located within an Employment Area may permit all uses in the mixed use designation excluding residential. Redesignating the lands to Employment Commercial represents a downgrade in designation and does not align with SmartCentres' intent to protect for the viability of their retail sites.

**For these reasons, we propose the following amendments:**

- **That Meadowvale and 1100 Burnhamthorpe be redesignated Community Node on Schedule 1 City Structure, as Community Nodes are planned to have a mixture of low-rise, mid-rise and tall buildings.** Based on the sites' adjacency to both employment areas and neighbourhoods, Community Node is the most appropriate city structure element for the two sites to accommodate transit-supportive growth and development, while incorporating appropriate transitions to adjacent areas.
- **That the portions of Meadowvale and 1100 Burnhamthorpe supported for conversion by City Staff be redesignated Mixed Use on Schedule 7 Land Use Designations, as City Staff have indicated their support for the conversion of these sites.** A mixed use designation will support SmartCentres' vision for the sites and City Staff's recommendations.
- **That the portions of Meadowvale not requested for conversion and the portions of 1100 Burnhamthorpe not supported for conversion be maintained as Mixed Use Limited on Schedule 7 Land Use Designations.** The Mixed Use Limited land use designation permits all the uses permitted within the Mixed Use designation, with the exception of sensitive land uses. A redesignation of these lands would support the Draft MOP's direction to located retail areas within the mixed use designation.
- **Maintain 780 Burnhamthorpe as Mixed Use Limited on Schedule 7 Land Use Designations.** Given that the Official Plan directs retail uses to mixed use areas and discourages the expansion of existing or establishment of new major retail, particularly within employment areas, a Mixed Use Limited land use designation is the most appropriate designation for this Site. This amendment would protect the site's existing retail use permissions.

## **2) Comment on Major Retail Permissions**

The Draft MOP defines major retail as large-scale or large-format stand-alone retail stores (of 1,000 sq.m. GFA or greater) or retail centres (of 3,000 sq.m. of GFA or greater) that have the primary purpose of commercial activities.

All three sites currently have significant retail uses (29,312 sq.m. at SmartCentres Meadowvale, 15,860 sq.m. at 1100 Burnhamthorpe, and 17,799 sq.m. at 780 Burnhamthorpe). All three sites have at least one building that is considered *major retail* per the Draft MOP, which is considered a non-employment use, and all three sites are considered a retail centre.

Through the ESR study, City Staff indicated their support for the conversion of SmartCentres Meadowvale and 1100 Burnhamthorpe to permit residential uses; however, the conditions for conversion indicated that there would need to be appropriate phasing with any future redevelopment on the sites, including the replacement of retail uses. As part of the future phasing strategy, SmartCentres will need to ensure that there is regard for the leases of their tenants, and in some cases may result in the relocation of certain tenants into vacant units on portions of the lands that are not undergoing redevelopment. It is important that the retail uses on SmartCentres' Sites are protected to ensure that existing tenants can continue to operate on-site.

In the preamble to section 9.4, it is stated that “within Employment Areas, ancillary retail uses will be encouraged in order to provide services to local businesses and employees. New freestanding retail uses will not be permitted.”

This direction is implemented in Policy 15.4.9.3 which states that no *major retail* developments will be permitted, except where *major retail* uses are lawfully established on lands designated Employment Commercial. Further, Policy 15.5.1 states that “the conversion of lands in Employment Areas to permit non-employment uses is prohibited. For the purposes of this policy, *major retail* uses are considered non-employment uses,” and formal conversion requests may only be considered through a regional municipal comprehensive review.

**Prohibiting new freestanding retail uses is not appropriate. As retail is the predominant use of the Sites, it is expected that 780 Burnhamthorpe and a portion of the lands on SmartCentres Meadowvale and 1100 Burnhamthorpe will continue to accommodate retail, and in some cases *major retail*.**

**For these reasons, we propose the following amendments:**

- That the preamble to Section 9.4 Retail be amended to state that “New freestanding retail uses will ~~not be permitted~~ be discouraged. Where retail uses currently exist, the expansion of such sites shall be permitted by the City.”

### 3) Non-residential Replacement

Policy 11.3.2 states that “Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment.” Furthermore, Policy 11.3 notes that “Maintaining the non-residential planned function means providing: a. a concentration of convenient, easily accessible office, retail, and service commercial uses that meet the needs of local residents and employees; and b. employment opportunities, such as office, recreation and institutional jobs.”

The Draft MOP currently does not permit a loss of non-residential floor space through redevelopment of lands within the Mixed Use designation. Based on this, any future redevelopment of SmartCentres’ sites would require 1:1 replacement of non-residential uses.

In recent years, SmartCentres has been impacted by the shifting economy and the ways in which people access the goods and services they need in their day-to-day. Increasingly, individuals are relying on online shopping to meet their daily needs, reducing the community needs for physical retail spaces. As such, SmartCentres is adapting to current market and community needs, and is seeking to diversify the uses permitted on their lands. While sites are expected to retain a large proportion of retail, maintaining a 1:1 retail ratio may be unfeasible.

For these reasons, we propose the following amendments:

- That Policy 11.3.2 be amended to state that “Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space will ~~not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced~~ be required to provide a non-residential component as part of the redevelopment. The exact mix of appropriate non-residential uses will be established through future planning applications to the satisfaction of the City.”



#### **4) Comment on Job and Business Policies**

##### **Supporting Jobs and Businesses – General Policies**

The Draft MOP states that, “To accommodate the City’s forecasted 90,000 job growth by 2051, employment opportunities will be provided in mixed-use Strategic Growth Areas and in Employment Areas protected for employment uses.” Further, it states that “the city’s focus for major office, retail and employment growth will be in the Strategic Growth Areas, supported by existing or planned higher order transit.”

Policy 9.1.4 states that Mississauga will provide for a range of employment activities, including office and diversified employment uses. The preamble to Section 9.1 also states that “Employment areas will also support business and economic uses, including manufacturing and research and development.” To this end, the Draft MOP outlines that the City will “encourage the intensification of existing Employment Areas with compatible employment uses” (9.1.4.c) and “concentrate high-density employment uses such as major office and major institutional in Major Transit Station Areas and other Strategic Growth Areas” (9.1.4.d).

**Two of SmartCentres’ sites (Meadowvale and 1100 Burnhamthorpe) are located within a Planned Major Transit Station Area (MTSA), which is identified as a Strategic Growth Area in Schedule 1 City Structure of the Draft MOP (see Figure 1). Per the policies of the Draft MOP, the Sites are planned for employment intensification, however, the retail uses that exist on these lands are also considered to be non-employment uses (see commentary under Employment Commercial policies).**

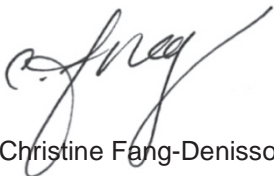
**As per the Staff Report from the ESR study, City Staff support the conversion of Meadowvale and the partial conversion of 1100 Burnhamthorpe to permit non-employment uses, including sensitive uses like residential. Portions of these sites, in addition to 780 Burnhamthorpe, will remain within the Employment Area city structure and Employment Commercial land use designation, unless redesignated per the recommendations listed at the end of section 1. It is important that the policy framework has regard not only for existing employment areas and retail uses, but also the sites where sensitive land uses will be permitted adjacent to existing employment lands that are encouraged to intensify in the long-term.**

For these reasons, we propose the following amendments:

- Revise Policy 9.1.4.c to read “encourage the intensification of existing Employment Areas with compatible ~~employment~~ uses” (9.1.4.c) and amend policy 9.1.4.d to read “concentrate high-density employment uses such as major office and major institutional in Major Transit Station Areas and other Strategic Growth Areas, ~~where appropriate~~” (9.1.4.d).
- That a new Policy 9.1.5 is introduced that states “**Notwithstanding Policy 9.4.1, any development or redevelopment of lands within Employment and Strategic Growth Areas, and located adjacent to lands outside of the Employment Area, will have regard for the adjacent uses to ensure that there are no land use compatibility concerns.**”

Thank you for your consideration.

Yours very truly,



Christine Fang-Denissov  
Partner

URBAN STRATEGIES INC.

Planning and Development Committee  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON  
L5B 3C1

March 15<sup>th</sup>, 2024

**Attention: Sharleen Bayovo and Ben Phillips**

**Re: Draft City of Mississauga Official Plan (OP)**

We are planning consultants for Port Credit West Village Partners (PCWVP), who are the owners of the properties known as 70 Mississauga Road South and 181 Lakeshore Road West in the City of Mississauga (the “Brightwater Site”).

We are writing to provide our comments related to the final Draft Mississauga Official Plan 2051 (“Draft MOP (Mississauga Official Plan)”). We submitted a comment letter on March 30<sup>th</sup>, 2022, related to the Draft MOP Bundle 1 policies, which highlighted several of our concerns related to the effect of those policies on the viability of the ongoing development of Brightwater. Following the release of Bundles 2 and 3, we revisited our original letter in the context of the full Draft MOP and provided further commentary on the draft policy framework as it would apply to Brightwater in a letter dated October 13<sup>th</sup>, 2023.

With the Final Draft OP being presented to Planning and Economic Development Committee (PEDC) on March 18<sup>th</sup>, we have reviewed our previous letters against the policies contained in the Final Draft, and provided our remaining comments for consideration in this Letter.

**City Structure: Contained within a Neighbourhood and is not identified as a Strategic Growth Area**

Brightwater is planned and developing as a high-density, mixed-use, and transit-oriented community, and will have an overall people and job density in line with the denser Community Nodes (150 to 250 PJH). Through the review of its OP, Mississauga has comprehensively reviewed all lands in the City and strengthened its intent to establish a clear City Structure/urban hierarchy, yet continues to locate Brightwater in a Neighbourhood, and by extension, not in a Strategic Growth Area (SGA). This can be interpreted as a misalignment with the vision and goals for the development of Brightwater within the broader provincial and regional policy context. Despite certain policies permitting a level of intensification and higher-density development within Neighbourhoods, there remains a lack of clarity regarding the level of intensification ultimately deemed appropriate for Brightwater, particularly within the evolving provincial context that is focused on the rapid delivery of substantially more housing.

We previously identified Policy 3.3.5.2 (was 3.4.1) as a concern as it stated, “It is the intent of this Plan that the policies associated with the urban hierarchy and City Structure will be maintained and reinforced as the city continues to develop”. This policy has been revised to “The policies associated with the City Structure will be maintained and reinforced as the city continues to develop”. We also raised concerns with policy 17.4.4 (then 15.4.4) as it required all site-specific official plan amendments to demonstrate “conformity to the City Structure policies of the Official Plan.” This policy has been revised to “Demonstration of compatibility with the City Structure requirements of this Plan will be required.” The change to 17.4.4 is a positive step.

Nevertheless, we continue to have concerns with policies that can be interpreted to enforce a restricted level of development at Brightwater that is neither desirable nor appropriate, such as policy 14.1.1.5 (was 14.1.5), which states “Neighbourhoods will not be the focus for major intensification and should be regarded as residential areas where the general building scale and lot fabric are to be maintained”. The level of development already permitted at Brightwater can be defined as “major”, particularly within the policy context established and language used by both A Place to Grow: Growth Plan for the Greater Golden Horseshoe and the Region of Peel Official Plan (ROP). Within the context of the strict City Structure/urban hierarchy proposed in the MOP, Policy 14.1.1.5 presents a potential source of conflict for the continued development of Brightwater.

We recognize that the Special Sites and Character Policies are the relevant policies with regards to maximum permitted heights, as stated in multiple locations in the Draft MOP (e.g.; Figure 3.2 on Page 3-10; 14.1.1.1; and 14.1.1.4.a). Nevertheless, the general intent of keeping housing forms low-rise in scale (14.1.1.4.a) combined with the limitation on “major” intensification (14.1.1.5) and the statement related to maintaining and reinforcing the urban hierarchy discussed above (3.3.5.2) continue to create a potential conflict regarding the level and form of intensification to be considered appropriate for Brightwater under the Draft MOP.

Despite the changes incorporated into the Final Draft of the OP, the overall context for our concern remains: following a City-wide comprehensive review, the Draft MOP continues to carry forward an important inconsistency as it pertains to the level of intensification intended and supported at Brightwater. For these reasons, we continue to propose the following amendments:

- Schedule 1 – City Structure of the Draft MOP be modified to designate the Brightwater Site as a new Community Node; or

Add the following policy to the Port Credit Local Area Plan:

- 12.3.3.4 Major intensification may be appropriate at the Brightwater Site.



### **Policy Support for Growth and Density at Brightwater as a Remediated Brownfield**

Related to the above issues, we identified a concern that the proposed policy framework could undermine the optimal redevelopment of Brightwater as a remediated brownfield site. The ROP encourages Mississauga to identify major intensification opportunities such as brownfield sites in their Official Plan (5.6.17.10) and encourages Mississauga to establish official plan policies that promote the redevelopment and reuse of brownfield sites (5.4.18.18). The Draft OP policies do not respond to this ROP direction as Brightwater is not identified as a Strategic Growth Area. It is important that the investment in and opportunity for the redevelopment of the Site be appropriately recognized, as described in the previous section.

### **Inflexible and Broad Application of Adverse Impacts on Neighbouring Lands**

We raised concerns with section 17.4.3 (then 15.4.3), which contains policies related to the requirements of development applications. Policy 17.4.3.d requires the “demonstration of no adverse impacts on the development or functioning of neighbouring lands.” The term “no adverse impacts” is not defined in the Official Plan and can result in an inappropriately restrictive interpretation. The requirement that development applications not hinder the development of adjacent land is not a concern, but the inclusion of “functioning” (also not defined) presents opportunities for inappropriate interpretation. This is compounded by the test of “no adverse impacts” which removes any room for contextual assessment.

No changes to this policy are made in the Final Draft OP, and our concerns remain with respect to the above.

We continue to recommend this policy be amended to read as the following:

“The demonstration of no, or where this cannot be achieved, appropriate levels of adverse impacts on the development or functioning of neighbouring lands.”

### **Increasing the Policy Test of Urban Design Guidelines to “consistency”**

Policy 17.4.3(b) [was 15.4.3(b)] is a new policy that requires development applications to satisfactorily address “consistency with all applicable Urban Design Guidelines.” This is not appropriate as it is well-established that the test for urban design guidelines is that development applications will “have regard for” the applicable urban design guidelines. Urban design guidelines are not policy, as they are not subject to a statutory planning process or appeal rights.

No changes to this policy are made in the Final Draft OP, and our concerns remain with respect to the above.

Accordingly, we continue to recommend this language in the Draft MOP be changed to “Appropriate regard for all applicable Urban Design Guidelines.”

**Policy 17.4.5 Will Force All Development Applications Proposing to Increase Height to be Official Plan Amendments**

Policy 17.4.5 (was 15.4.5) states that “It is the intent of this Plan that the minimum and/or maximum number of storeys for buildings will be maintained where identified and adhered to as part of site-specific development applications.” Despite the recognition in policy 3.3.5.2 (was 3.4.1.b) that “height and density modifications may be appropriate, policy 17.4.5 will force all minor variance applications and zoning by-law amendments that are related to height to be submitted as official plan amendments, as they will fail to conform to the intent of the Official Plan given this clear statement of opposition. This will lead to unnecessarily complex applications that will add costs to developments, increase timelines, and require additional staff time to process development applications that may contribute positively to their neighbourhoods through contextually appropriate height increases.

This inconsistency in policy may hinder strategic growth, limit transit-supportive development, and lead to unnecessarily complex applications.

No changes to policy 17.4.5 are made in the Final Draft OP, and our concerns remain with respect to the above.

We recommend that the part of policy 17.4.5 quoted above be deleted so that it reads:

“17.4.5 Transition in height and built form will occur within the height ranges where established by this Plan.”

**Conclusion**

The City of Mississauga's Draft Official Plan 2051 represents a positive step towards shaping a sustainable, diverse, and transit-oriented urban environment. The policies and directions outlined in the Plan generally reflect a forward-thinking approach that aligns with the city's broader goals and the provincial mandate for new housing and sustainable development.

Nevertheless, inconsistency remains with regard to the intent for the appropriate level of intensification at Brightwater. The urban hierarchy and City Structure policies can be read in a

manner that prevent, rather than support, both the level of intensification already permitted at Brightwater, and the additional intensification currently being proposed.

Also, there remain areas within the Plan that we believe require further refinement and clarity. The concerns identified in this Letter, particularly those related to impacts on neighbouring lands, urban design guidelines, height adjustments, and contradictory application requirements, have implications for the level of complexity, viability, and ease of processing development applications in the City of Mississauga. Addressing these issues will facilitate positive development for the City and development community alike.

Thank you for considering our comments.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Cyndi Rottenberg-Walker, FCIP, RPP, MScPI  
Partner



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

March 15, 2024

Ben Phillips  
Project Manager, OP Review  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON  
L5B 3C1

Dear Mr. Phillips:

**RE: OFFICIAL PLAN REVIEW – REQUEST FOR ADDITIONAL USES  
6967 MARITZ DRIVE, MISSISSAUGA  
CITY FILE: SP 21-182 W5  
OUR FILE: 20384C**

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We have been working with the City on the development of the Studio Bottega films studio on the lands municipally addressed at 6967 Maritz Drive in the City of Mississauga (the "Subject Lands"). Our client, Studio Bottega Inc. (the "Owner"), has been moving through the Site Plan Approval process over the last year.

Due to the current economic climate effecting the building and movie industry, the project was put on hold while options were being reviewed relative to securing financing for the project. The Owner is committed to proceeding with the film studio, however, the proposal will need to occur in separate phases of development. As discussed with City staff, in order to help finance the first phase, the Owner will require flexibility in terms of additional uses permitted under the in-effect planning policy regime effecting the Subject Lands and the proposal.

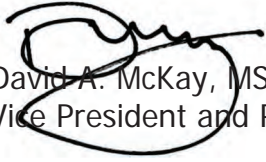
As such, the Owner requests that flexibility be added to the Draft City of Mississauga Official Plan 2051 (the "Draft OP") to allow for additional site-specific uses under the contemplated "Office" land use designation for the Subject Lands. Specifically, we request that the "warehousing, distributing and wholesaling" use be identified as an additional permitted use. The addition of this use will allow for more flexibility in terms of use permissions under the forthcoming municipal policy regime and, thus, improve resilience in the face of current and future economic conditions.

We look forward to continue working with City staff to move this exciting project forward. If you have any questions, please do not hesitate to contact the undersigned.



Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'D. McKay', written over the printed name and title.

David A. McKay, MSc, MLAI, MCIP, RPP  
Vice President and Partner

A handwritten signature in black ink, appearing to read 'S. Staicu', written over the printed name and title.

Stefan Staicu, BES  
Associate

cc. *Studio Bottega Inc.*  
*Aiden Stanley, Manager, Development North*  
*City Clerk*

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 236 – 002

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE:      **Mississauga Official Plan 2051**  
          **Camilla Towns Inc.**  
          **2040 Camilla Road, City of Mississauga**

Glen Schnarr and Associates Inc (GSAI) are the planning consultants to Camilla Towns Inc. (the "Owner") of the lands municipally known as 2040 Camilla Road, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated June 23, 2023, July 31, 2023 and March 14, 2024, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the west side of Camilla Road, north of the North Service Road and south of the hydro corridor. The Site is currently vacant. Based on the in-effect planning policy framework, the Site is located within the Downtown Hospital Character Area, within the Downtown Mississauga Urban Growth Centre, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the North Service Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Residential High Density', with a Natural Hazards policy overlay (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being within 300 metres of the Hazel McCallion Light Rail Transit ('LRT') network and various street-level transit services. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Downtown Hospital as a vibrant, complete, 15-minute community.

By way of background, we highlight that the Subject Lands are subject to an active development approval. More specifically, the Site is subject to an active Site Plan Approval ('SPA') application (City File No. SP-19-50 W7) which will

further implement the development vision for the Site. Overall, the SPA application will facilitate the Site to be redeveloped for a compact, pedestrian-oriented development comprised of 148 3-storey, stacked, back-to-back townhouse dwellings, organized around five (5) development blocks.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 12 (Urban Growth Centre), 16 (Special Sites) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

In accordance with the in-effect Provincial and Regional policy frameworks, the Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area. We support the identification and policy directions identified for Strategic Growth Areas., which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, thereby removing reference to housing type.

'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:

- social housing or other publicly funded housing; or
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased to a 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase "encouraged". The re-phasing and use of the word "encourage" is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (20% or less) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain unit type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'

Table 5.1 – Peel-Wide New Housing Unit Targets

Target Area	Targets
Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households
Rental	That 25% of all new housing units are rental tenure
Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30%



percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. It can also challenge the implementation of development, particularly when development fronts onto private streets which often have reduced ROW widths. For the reasons outlined above, this policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*



The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. In our opinion, the 45 degree angular plane requirement should be removed from the above-noted policy.

#### ***8.6.1, Buildings & Building Types***

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the draft MOP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. Of relevance to the Subject Lands, the draft MOP presents characterizations of low-rise built forms as follows:

*'a. Low-rise buildings: they include a variety of grade-related housing types that range from detached and semi-detached dwellings to slightly denser forms such as townhouses and multiplexes. Low-rise buildings can also house non-residential uses such as commercial, institutional or other employment uses. They assist in providing a mix of built forms that support streets, parks and open spaces, at a lower scale – no taller than four storeys in height – and can be designed to integrate architecturally to complement the surrounding context and provide transition to existing streetscapes'.*

While we support the above-noted low-rise building characterization, we highlight that there is a disconnect between the approved low-rise built form for the Subject Lands and the built form based land use designation of 'Residential High-Rise' assigned to the Site. In our opinion, the above-noted characterization should be modified to recognize that low-rise buildings may exist and be permitted in various land use designations and in various communities across the City.

#### **Chapter 10: Land Use Designations**

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions in comparison to existing permissions.

In the case of the Subject Lands, Schedule 7 has re-designated the Subject Lands from 'Residential High Density' to 'Residential High-Rise'. A Natural Hazards policy overlay has also been revised, but continues to apply a segment of the Site immediately north of the adjacent gas station facility. The proposed re-designation is concerning. Specifically, the active SPA application for the Site would introduce a low-rise, townhouse built form. However, the draft parent 'Residential High-Rise' land use policies (Policies 10.2.5.10 and 10.2.10.11) state that dwelling units in buildings with heights greater than 8 storeys are permitted or alternatively, lower rise residential built forms such as townhouses are permitted as accessory uses to an apartment structure on the same lot. A narrow interpretation of the draft residential-related land use policies would appear to suggest that townhouse dwellings are not permitted. This absence of permissions for townhouse dwellings is concerning and conflicts with the Special Site policy which is to apply to the Subject Lands.

Furthermore, the proposed 'Residential High-Rise' designation and associated height permission for Residential High-Rise lands of 8 storeys is inconsistent and conflicts with the 'Residential High Density' designation and maximum four (4) storey height permission identified for the Site on Schedule 8m. The application of a Natural Hazards overlay as identified on Schedule 7 is also inconsistent and conflicts with the land use designations indicated on Schedule 8m. Given the above, the Site's designation requires re-evaluation.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8m, the Subject Lands are identified as being located within the North Service Protected Major Transit Station Area (PMTSA), as being designated 'Residential High Density' and as having a maximum building height permission of 4 storeys. We support the inclusion of the Subject Lands within the North Service PMTSA given the Site's locational attributes. However, we request that additional policy direction be provided to determine how development applications which seek building heights above and beyond those established by the MTSA Schedule are to be evaluated. In the case of the Subject Lands, while the height permissions are appreciated, they may also restrict development opportunities should an alternative development form be desired. Additionally, the identified maximum height of 4 storeys is less than height permissions for lands to the north of the hydro corridor. Sufficiently high height permissions are requested to ensure the ability of the Site to accommodate the provision of a high-quality, refined, efficient, compact development that supports the Provincial and Regional objectives for MTSA lands is not challenged.

#### Chapter 12: Urban Growth Centre:

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. In accordance with Chapter 12 as drafted, the Subject Lands are located within the Urban Growth Centre and the Hospital Character Area of the Urban Growth Centre.

Sections 12.1, 12.3 and 12.6 present a refined policy framework for lands within the Hospital Urban Growth Centre Character Area. We are concerned with the revised Hospital Urban Growth Centre Character Area policy framework as presented in Section 12.6. Our concerns with these policies, which appear to be a repetition of the policies enacted by City Council following the 2022 Downtown Fairview, Cooksville and Hospital Policy Review, is related to Policies 12.6.3.2 and 12.6.4. Policy 12.6.3 permits additional height without requiring an Amendment provided additional non-residential areas are provided. In our opinion, Policy 12.6.3.2 as drafted does not adequately accommodate the evolving context

of the community nor changing market trends. The requirement to provide additional non-residential uses and area above the ground level does not adequately accommodate a developer's ability to right-size the non-residential areas to be provided and facilitate an optimal site design. We request that the policy be modified to enable additional height to be permitted, subject to differing evaluation criteria.

Finally, Policy 12.6.4 is concerning given the development potential of the Subject Lands was confirmed through the active development application. We request that the Subject Lands be excluded from this policy going forward.

#### Chapter 16: Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 16 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area policies. Of relevance to the Subject Lands, the Site is identified as being located within and subject to Special Site 122 (Downtown Hospital – UGC) and policies 16.122.1 and 16.122.2. Policy 16.122.2 continues the permission for townhouses on the Subject Lands; however, this Policy is also highlighted as being a component of the broader PMTSA policy framework. We request that this policy be maintained.

#### **Conclusion**

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP

**Managing Partner**



Stephanie Matveeva, MCIP, RPP

**Associate**

cc. Camilla Towns Inc.  
Councillor Damerla  
Ben Philips, Project Manager, Official Plan Review



Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 1319-001

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
Equity Three Holdings Inc.  
3085 Hurontario Street, City of Mississauga

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Equity Three Holdings Inc. (the "Owner") of the lands municipally known as 3085 Hurontario Street, in the City of Mississauga (the 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated June 23, 2023, July 31, 2023 and March 15, 2024, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Site. This Letter provides our comments on the draft Mississauga Official Plan 2051, released on February 12, 2024.

**Background:**

The Site is located on the east side of Hurontario Street, south of Kirwin Avenue and is currently improved with a 2-storey multi-tenant commercial structure, a parkade structure and surface parking areas.

The in-effect policy framework, established by A Place to Grow, 2020, the Region of Peel Official Plan, the Mississauga Official Plan, the Hurontario / Main Street Master Plan and the Dundas Connects Master Plan, identify the Site as an appropriate and desirable location for higher density, tall, compact, mixed-use, pedestrian-oriented and transit-supportive development to occur.

In accordance with the policy framework, the Site is:

- within the Downtown Mississauga Urban Growth Centre;
- within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan);
- within the Dundas Major Transit Station Area ('MTSA'; in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan);

- within the Downtown Cooksville Character Area; and,
- designated 'Mixed Use' (in accordance with Schedule 10, Mississauga Official Plan).

The Site is immediately adjacent to the Hurontario Light Rail Transit ('HuLRT') network and is within a comfortable walking distance of the Cooksville GO Station and the planned Dundas Bus Rapid Transit ('BRT') network. Additionally, the Site is also within walking distance of various services, amenities, facilities, parks and greenspaces that meet the daily needs of residents and support Downtown Cooksville as a vibrant, complete, 15-minute community.

The Site is subject to active development applications which were filed and deemed completed in September of 2021 (City File OZ-OPA 21-11 W7). As further demonstrated in the submission materials accompanying these applications, the Owner is seeking permission to redevelop the Site for a compact, mixed-use, pedestrian-oriented and transit supportive development. This is to be achieved through the provision of four (4) high-quality, refined building forms (Buildings 1, 2, 3 and 4) of varying heights, containing a mixture of residential and non-residential uses, amenity spaces and dwelling units of varying sizes and configurations. A selection of grade-related, non-residential units with direct pedestrian connections to the Site's Hurontario Street's frontage are also proposed. The development applications for the Site are currently under technical review by City, Regional and Agency Staff.

#### **Official Plan Comments**

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024 and offer the following comments.

We support the move to a modified policy framework provided in the draft Mississauga Official Plan 2051 to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. For the purpose of this Letter, we will be providing our comments on the policies contained in Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 12 (Urban Growth Centre), 16 (Special Sites) and select Schedules. This Letter represents our initial thoughts and we reserve the right to provide supplementary comments in the future as this process continues.

Based on our review of the Mississauga Official Plan 2051 and specifically the aspects noted above, we have a number of concerns as further outlined in more detail below.

#### Chapter 3: Directing New Development

In accordance with the in-effect Provincial and Regional policy frameworks, the Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas.

In accordance with the policy framework (including Policy 3.3.1.1) and Map 3-1, Strategic Growth Areas, the Site is located within a Strategic Growth Area as it is located within the Urban Growth Centre and within a Major Transit Station Area. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive

development ought to occur to support the achievement of complete communities, however we are concerned that the proposed hierarchy of height and density requirements for the City Structure elements, many of which are also Strategic Growth Areas, proposed in Figure 3.2 are not consistent with the goals and objectives and may create unnecessarily misleading and conflicting requirements for the noted Strategic Growth Areas that fall within more than one category.

We are also concerned with Policy 3.3.5.2.c which states:

*'3.3.5.2. The policies associated with the City Structure will be maintained and reinforced as the city continues to develop. It is necessary that changes that affect the City Structure's hierarchy of densities be considered through an Official Plan update or review. The reasons for this include the following:*

*c. Erosion of development intensity policies through ongoing site-specific amendments may lead to cumulative negative impacts on local services, community infrastructure and transportation facilities. While individual development approvals that are out of scale with the urban hierarchy may not display these impacts immediately, they may present aggregate effects over time. The optimal allocation of financial resources, infrastructure and service levels to match community need requires long term comprehensive planning that is predictable and location-specific.'*

In our opinion, the above-noted policy is concerning and contrary to the Planning Act. In particular, each development application is required to be considered individually and on its own merits. The assertion that site-specific amendments may result in cumulative negative impacts is incorrect, does not capture that each development application must be supported by extensive technical study to demonstrate suitability and serviceability and will challenge the timely review and approval of development in locations where development ought to occur. We oppose the policy as written and request that item c) be removed.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear as the policy language does not tie to a particular City Structure Element. In addition, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera without reference to the applicable City Structure element. For example, in an Urban Growth Centre the appropriate range and mix of housing types may vary widely from the range and mix that is appropriate for a property located in the Neighbourhood City Structure element. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to focus on

the City Structure element in question and to encourage phased developments to provide a range and mixture of housing within each development phase and to specify the intent of varied housing types.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased to a 50% target from the previous target of 30%. The language of the policy has also been changed to incorporate the phrase "encouraged". Although the introduction of much needed flexibility with the use of the word "encourage" is supported we remain concerned with the policy as drafted. In our opinion, the policy should be modified to encourage a reduced percentage (20% or less) of larger, family-sized units (understood as being two-bedroom units or larger and not limited to 2 bedroom and 3 bedroom units) based on market trends. This requirement for a substantial number of larger dwelling units does not adequately capture market demands, trends or the reality of purchase prices being correlated to unit sizes. The requirement for half (50%) of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the delivery of housing units in appropriate locations in proximity to existing and planned transit networks and support the creation of complete communities, in the midst of a Provincial housing crisis.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing</i>



	<i>and Homelessness Plan and Regional Housing Strategy</i>
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The above-noted policy and Table 5.1, as written, are problematic. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the target in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the target that 25% of all new housing units be rental in tenure will challenge the rapid delivery of housing units, in appropriate locations.

Furthermore, the targets for the provision of affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy target that 30% of all new housing units across the City of Mississauga be affordable housing, targets a level of affordable housing outside of these Inclusionary Zoning Areas that is significantly higher than what would be required within them. Furthermore and in accordance with the Province's announcement accompanying Bill 23, the target percentage and tenure of affordable housing units required pursuant to Inclusionary Zoning remains in question and targets that greatly exceed the targets noted by the Province are concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.3.6, 8.4.5.2, 8.5.1.3, 8.6.2.2, 8.6.2.5 and 8.6.2.7, as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, if this policy is to relate to all City Structure areas, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate in most City Structure areas and it is a policy that has specific application to a limited set of built form elements and transitions between City Structure areas and features. As written, the policy will apply a one-size-fits-all approach to all sites across the City, regardless of their location and City Structure. Furthermore, it is unclear what is meant by the term "relate". If this term is meant to import a limitation of building height to relate to the ROW width such a policy will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations including within Strategic Growth Areas. If this type of a policy is to remain it should be revised to refer to the relevant built forms and City Structure Areas and building relationship to which it refers and to clarify its application.

*'8.4.3.6. New streets may be introduced to create prominent view corridors.'*

The above-noted policy is concerning and requires revision. In our opinion, the need for a new street is best suited to the technical review of a development application and should be informed by technical requirements such as traffic

demands. The policy, as currently drafted, is concerning given there is no evaluation criteria provided to guide the placement of streets, when these new streets may be identified as being required and no criteria nor definition for what constitutes a view corridor. Furthermore, the requirement that a new street, with no clarity provided regarding the right-of-way width of said street, be provided to secure the protection of view corridors is contrary to good planning. It may also challenge the development potential of lands given the provision of land for new streets can significantly and adversely impact development. Based on the above, we oppose this policy and request its removal.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to "encourage" compliance with City Standards as strict conformance with the City's Standard for public open spaces does not provide the flexibility required to address the appropriate provision of POPS spaces and elevates a City Standard that is not a policy and is not subject to the same level of review to official plan policy which is in appropriate and problematic.

*'8.5.1.3. Development will support transit and active transportation by:*

- a. locating buildings at the street edge, where appropriate;*
- b. requiring front doors that open to the public street with adequate barrier-free access and paths;*
- c. ensuring active/animated building facades and high quality architecture;*
- d. ensuring buildings respect the scale of the street;*
- e. ensuring appropriate massing for the context;*
- f. providing pedestrian safety and comfort; and*
- g. providing bicycle destination amenities such as bicycle parking, shower facilities and clothing lockers, where appropriate..'*

While we support the purpose and intent of the above-noted policy, we are concerned with Policy item d), being that buildings are to respect the scale of the street. As stated throughout this Letter, we are concerned with policy that requires a building to have a relationship to the street upon which it fronts. In our opinion, Policy 8.5.1.3.d) is overly restrictive, does not provide sufficient flexibility for a range of appropriate, transit-supportive built forms to be provided and is also contrary to Policy 8.5.1.3.e). Specifically, buildings must have a sufficiently high massing, scale and density to make best use of transit networks and transit investments. By requiring and arbitrarily limiting buildings to have a relationship with the scale of the street, this will challenge a proponent's ability to ensure an appropriate mass, scale and density are provided. For these reasons, we request that Policy 8.5.1.3.d) be removed.

- '8.6.2.2. Developments will be compatible and provide appropriate transition to existing and planned development by having regard for the following elements:*
- a. Natural Heritage System, Water Resource System, natural hazards (flooding and erosion) and natural and cultural heritage features;*
  - b. street and block patterns;*
  - c. the size and configuration of properties along a street, including lot frontages and areas;*
  - d. continuity and enhancements of streetscapes;*
  - e. the size and distribution of building mass and height;*
  - f. appropriate height transition to adjacent buildings including considerations for applicable angular planes and separation distances;*
  - g. front, side and rear yards;*
  - h. the orientation of buildings, structures and landscapes on a property;*
  - i. views, sunlight and wind conditions;*
  - j. the local vernacular and architectural character as represented by the rhythm, textures and building materials;*
  - k. privacy and overlook; and*
  - l. the function and use of buildings, structures and landscapes.'*

While we are concerned with the above policy as currently drafted as a whole, we are particularly concerned about aspects g) and j). More specifically, an evaluation of the existing pattern of front, side and rear setbacks in a determination on whether a development can be considered to be compatible is overly restrictive and does not provide sufficient flexibility. It also does not adequately capture the reality that an existing pattern of front, side and rear setbacks or yards can and does vary significantly across the various communities of the City. It also does not adequately capture that the planned context of a community often requires a variation from existing yard and setback patterns. This would be in contrast to other local policy objectives which encourage compact development with setbacks that encourage forms that frame the street edge. A strict adherence to the evaluation of existing patterns of setbacks will unnecessarily limit development opportunities, will challenge the timely delivery of vibrant, compact, high-quality development in appropriate locations and in our opinion, is contrary to the policy objectives outlined in other Chapters of the draft Official Plan. For these reasons, we request that this policy aspect be removed.

Similarly, we are concerned with aspect j). As drafted, there is a policy requirement that the existing local vernacular and architectural character of an area be considered in the evaluation of whether or not a development is compatible. In our opinion, this policy aspect unnecessarily elevates the consideration of an area's existing architecture. There are countless examples across the City of Mississauga where varying architectural elements are present and can in fact successfully co-exist. This occurrence provides for an eclectic community character and supports broader City policy objectives of supporting high-quality development. Aspect g) as written is inappropriate and should be removed.

- '8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, suggesting a policy option that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and misleading. In our opinion, the angular plane requirement should be removed from the above-noted policy and should be refined and included with appropriate reference to the City Structure area, and built form relationships to which it may be appropriately applied.

*'8.6.2.7. Proposed high-rise buildings in areas where two or more high-rise buildings exist within the immediate context will relate to the surrounding buildings and provide for appropriate height transition and separation distances.'*

The above policy is vague and concerning. More specifically, it is unclear how the above-noted policy is to be applied given there is no reference nor definition for how immediate context is to be understood. Furthermore, the evaluation of a development based on the presence or absence of existing high-rise buildings is inappropriate and contrary to good planning. The appropriateness of a new tall building is to be determined through a detailed review of a development application and based on a property's individual merits. Furthermore, the above-noted policy does not adequately provide sufficient flexibility to reflect a site's planned context. If the policy is to be narrowly interpreted, it may result in the planned context being disregarded and should there be a current absence of high-rise buildings in a property's immediate context, then a predetermined conclusion may be reached. For the reasons outlined above, we oppose this policy and request that it be removed.

#### Chapter 10: Land Use Designations

In accordance with the draft Schedule 7, Land Use Designations, the Site is designated 'Mixed Use'. The active development applications seek to re-designate the Site to 'Residential High Density'. It will be important to appropriately transition applications and approvals under the existing Official Plan into the proposed draft Mississauga Official Plan 2051. Further discussions will be required to ensure that such an appropriate transition is achieved in all cases including in regard to any approvals that may be obtained for the Site pursuant to the current in process applications.

On a related note, we are concerned with how Provincial planning policy applies to Policy 10.2.5.10 which states, among other matters, that where maximum building heights are not specified in a Character Area, *'then the maximum height will not be greater than the tallest existing building on the property'*. The above-noted policy, as contemplated, is unnecessarily restrictive and may hinder the ability for lands that are otherwise identified as appropriate and desirable locations to accommodate growth to have their development potential realized. Furthermore, the policy does not consider the evolving context of communities nor the ability for a development to accommodate contextually appropriate development that supports the creation of higher density, mixed-use, complete communities. Based on the above, it is our opinion that Policy 10.2.5.10 should be revised to instead include evaluation criteria for how an appropriate building height can be determined in cases where a target building height or range of heights in a Character Area has not been specified.

We are also concerned about the 'Mixed Use' policy framework, as presented in Policies 10.2.6.2 and 10.2.6.3 which state and appear to require the retention or replacement of all existing non-residential floor space on a property:



- '10.2.6.2.        *The planned function of lands designated Mixed Use is to provide a variety of retail, service and other uses to support the surrounding residents and businesses. Development on Mixed Use sites that includes residential uses will be required to contain a mixture of permitted uses. This mix of uses is required in order to create complete communities with destinations that are close enough for walking and cycling to be the most attractive transportation option. In addition to mitigating traffic congestion, this enhances human health and reduces greenhouse gas emissions.'*
- '10.2.6.3.        *Redevelopment of Mixed Use sites must maintain the same amount of non-residential floor space.'*

The intent of Policies 10.2.6.2 and 10.2.6.3 are concerning and do not appear to take into consideration Provincial and local policy objectives to address the current housing crisis. These requirements to replace existing non-residential area are concerning, problematic and should be removed. In our opinion, the policy does not adequately consider the evolving context of communities and market trends and the Provincial policy direction which addresses which land uses are appropriate categorized as "employment areas" and protected from conversion. Furthermore, the policies noted above may hinder the development potential of designated Mixed Use lands and the lands' ability to support contextually appropriate development that is able to further implement Provincial, Regional and local policy objectives for compact, mixed-use, complete communities and much needed housing.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r on the provided Schedules. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 11 and this inconsistency should be addressed.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval and changes or modification that occur at the Regional level require incorporation.

#### ***Major Transit Station Areas and the Site:***

In accordance with Schedule 8m, the Site is identified as being located within the Dundas Protected Major Transit Station Area (PMTSA), as being designated 'Mixed Use' and as having a maximum building height permission of 3 to 30 storeys. Although we support the inclusion of the Site within the Dundas PMTSA given the Site's locational attributes we are concerned with the application of an arbitrary height maximum of 30 storeys.

In our opinion, the application of a maximum building height limit of 30 storeys on the Site is unnecessarily low, especially considering the Site's locational attributes of being immediately adjacent to the Hazel McCallion Light Rail Transit (LRT) network, being within walking distance of the Cooksville GO Station and the Dundas Bus Rapid Transit (BRT) network as well as various other street-level transit networks. As stated above, the Site is also within 400 metres or less of various destinations, services, facilities, parks and greenspaces to meet the daily needs of residents. Redevelopment of the Site, supported by sufficiently high building height permissions, would further support the in-effect Provincial and Regional

policy objectives of directing compact, mixed-use, transit-supportive development to appropriate locations, such as within the Urban Growth Centre and along transit networks. Sufficient building height permissions will enable an optimal site design that can distribute mass, scale and density in an appropriate manner of the lot, while also supporting Cooksville as a vibrant, complete, 15-minute community. Furthermore, the proposed building height maximum will be a barrier to supporting efficient, high-quality development from occurring and will be a barrier to supporting greater housing choice, while we are in the midst of a Provincial housing crisis

Based on the above and the draft MTSA policy framework, we request that the proposed height maximums be removed and if they are not removed that they be significantly increased and that additional policy direction be provided to determine how development applications which seek building heights above and beyond those established by the MTSA Schedule 8a through 8r are to be evaluated. We reiterate that in the case of the Site, while the height permissions are appreciated, they are also unnecessarily restrictive particularly given the planned context for this segment of the Cooksville community. Furthermore, the current height permissions will challenge the ability of the Site to accommodate the provision of a high-quality, refined, efficient, compact, mixed-use development that supports the Provincial and Regional objectives for MTSA lands.

In addition, we are concerned with the MTSA policy framework, including Policies 11.3.2, 11.3.3 which state:

- '11.3.2.           Redevelopment within Mixed Use, Mixed Use Limited and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment.'*
- '11.3.3.           Maintaining the non-residential planned function means providing:*
- a)   a concentration of convenient, easily accessible office, retail and service commercial uses that meet the needs of local residents and employees; and*
  - b)   employment opportunities, such as office, recreation and institutional jobs.'*

As stated above, we are concerned with the policy requirements for replacement of non-residential area and its impact on the provision of much needed housing in accordance with Provincial policy and recent legislative changes related to the definition of "employment areas". In our opinion, the above-noted policies require modification to state that the provision of a variety of non-residential uses should be encouraged in a new development, rather than requiring non-residential area replacement. Non-residential uses are not specifically protected at the policy level and a blanket policy that would require their replacement is not in accordance with Provincial policy nor good planning.

#### Chapter 12: Urban Growth Centre:

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. In accordance with Chapter 12 as drafted, the Site is located within the Urban Growth Centre and the Cooksville Character Area of the Urban Growth Centre. As a Site within the Urban Growth Centre, we are concerned with the Urban Growth Centre policy framework and in particular Policies 12.1.1.5 and 12.1.1.6, which state:

*'12.1.1.5. Development applications within the Urban Growth Centre proposing a change to the designated land use, which results in a significant reduction in the number of jobs that could be accommodated on the site, will not be permitted unless considered through an official plan review or update.'*

The above-noted policy is unnecessarily restrictive, does not provide an ability to right-size non-residential floor area in light of the current economy and consumer trends, and may result in an inability for property owners to file a development application. Furthermore, as currently drafted, this policy runs contrary to Provincial policy including changes to the definition of "Employment Areas", will challenge the delivery of appropriately sized and located non-residential areas to support resident and visitor needs and will put in place unnatural limits on development within an Urban Growth Centre. For the reasons outlined above, it is our opinion that the policy should be removed.

*'12.1.1.6. Proponents of development applications within the Urban Growth Centre may be required to demonstrate how new development contributes to a concentration and mix of jobs as a key component of a mixed use transit-supportive development.'*

The above-noted policy is restrictive and does not provide sufficient flexibility to accommodate evolving community contexts nor market trends. The requirement to demonstrate how a development contributes to a concentration of jobs may prevent the development potential of lands from being realized. In our opinion, the above-noted policy requires modification to clearly identify how a concentration of jobs is to be defined and to provide greater flexibility for mixed-use developments to accommodate an appropriate, right-sized amount of non-residential uses.

#### ***Downtown Cooksville Urban Growth Centre***

We are concerned with Map 12-12 which identifies the locations of future pedestrian connections. The map alone raises issues as there is no implementing policy to state that the pedestrian connection locations shown are conceptual and may be refined without amendment to the Official Plan as is appropriate and standard in circumstances where the development of the block will be further refined at the Zoning and Site Plan approval stages. Furthermore, the implementation of these pedestrian connections can negatively impact the development potential of a site or adversely impact the development of an optimal site design if the required flexibility is not incorporated at the official plan level. Further clarity that the future pedestrian connections identified are conceptual is required.

Sections 12.3 and 12.5 present a refined policy framework for lands within the Cooksville Urban Growth Centre Character Area. We are concerned with the refined policy framework and in particular, Policies 12.3.2.1 and 12.5.4.2.

*'12.3.2.1. New buildings will achieve a high quality urban design and built form, and will be designed and located to:*

- a. create a transition in height generally consistent with a 45 degree angular plane that is measured from the property line adjacent to Residential Low Rise I and II land use designations;*
- b. generally maintain a minimum separation distance of 30 metres between portions of buildings that are greater than six storeys;*

- c. *add visual interest by varying the massing of buildings; and*
- d. *promote visibility and interest from the street through the use of high quality materials and architectural detailing in the design of podium.'*

The above-noted policy has incorporated urban design-related objectives into policy which is in appropriate and problematic. In particular, we highlight the urban design requirements that a 45 degree angular plane be respected when lands are adjacent to designated Residential Low Density I and II lands as well as the policy requirement that a 30 metre tower separation distance be provided. The inclusion of these urban design objectives into policy is concerning. In our opinion, the above-noted policy requires modification to include more flexibility and to recognize that appropriate transitions can be provided in a number of ways. The above-noted policy is unnecessarily restrictive and will serve to hinder the ability for lands to redevelop in support of the development vision for the Cooksville Urban Growth Centre Character Area.

Similarly, we are concerned with the revised Cooksville Urban Growth Centre Character Area policy framework as presented in Section 12.5. Our concerns with these policies, which appear to be a repetition of the policies enacted by City Council following the 2022 Downtown Fairview, Cooksville and Hospital Policy Review, have been previously noted in our earlier comment letters. We remain concerned with the evolving policy framework for lands within the Cooksville Urban Growth Centre area of the City. Of particular concern is Policy 12.5.4.2 which states:

*'12.4.5.2. On lands designated Residential High-Rise and Mixed Use and located outside of Special Site 1 in Cooksville Urban Growth Centre, the maximum permitted building height as shown on Schedule 8: Protected Major Transit Station Area (Schedule 8I) may be exceeded by up to three storeys without an amendment to this Plan, subject to meeting the building transition policies of this Plan, where a development provided additional non-residential uses, including community infrastructure. One additional storey in building height may be permitted for every 900 square metres of non-residential gross floor area (GFA) provided above the first storey. This does not include amenity space, above grade parking or ground floor non-residential uses, where required by the policies of this Plan.'*

As stated above, we are concerned with the identified maximum building height permission contemplated. While we appreciate the above-noted policy enables additional permitted height without requiring an Amendment, we are concerned with the assertion that additional height can be provided in exchange for a specified amount of additional non-residential areas, above the ground floor. In our opinion, the policy as drafted does not adequately accommodate the evolving context of the community nor changing market trends. The requirement to provide additional non-residential uses and area above the ground level does not adequately accommodate a developer's ability to right-size the non-residential areas to be provided and facilitate an optimal site design. We continue to request that the policy be modified to enable additional height to be permitted, subject to differing evaluation criteria.

#### Chapter 16: Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 16 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area



policies. Of relevance,, the Site is identified as being located within and subject to Special Site 113 (Downtown Cooksville – UGC) and policies 16.113.1 and 16.113.2. Policy 16.113.2 which states is of concern:

*'16.113.2. Notwithstanding the policies of this Plan, a minimum three floors of non-residential uses will be required for buildings on lands designated Mixed Use or Residential High Rise that are immediately adjacent to Hillcrest Avenue and Hurontario Street.'*

In our opinion, the above-noted policy is concerning and should be modified. The requirement for a minimum amount of non-residential uses, in terms of building storeys, is unnecessarily restrictive and can hinder the development potential of lands. Furthermore, the provision of 3 storeys of non-residential uses has not adequately considered the evolving community context nor market trends, including high vacancy rates in the post-pandemic period. Contrary to good planning and Provincial policy objectives, the policy will become a barrier to accommodating contextually appropriate, mixed-use, transit-supportive development. The above-noted policy should be modified to encourage the provision of a range and mixture of non-residential uses, without specifying a minimum floor area or number of storeys these non-residential uses should be provided across.

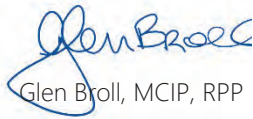
## Conclusion

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP

**Managing Partner**



Stephanie Matveeva, MCIP, RPP

**Associate**

cc. Equity Three Holdings Inc.  
Mattamy Homes  
Anne Benedetti, Goodmans

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 102 – 006

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
Erin Mills Town Centre (EMTC Holdings Inc.)  
5100 Erin Mills Parkway, City of Mississauga

Glen Schnarr and Associates Inc (GSAI) are the planning consultants to EMTC Holdings Inc. (the "Owner") of the lands municipally known as 5100 Erin Mills Parkway, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated June 23, 2023, July 31, 2023 and March 15, 2024, we are pleased to provide this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the north side of Eglinton Avenue West, west of Erin Mills Parkway. The Site is currently improved with a two (2)-storey shopping centre (referred to as 'Erin Mills Town Centre'), low-rise, multi-tenant commercial structures, detached restaurant structures with accessory drive-through facilities and surface parking areas. Based on the in-effect planning policy framework, the Site is located within the Central Erin Mills Major Node Character Area, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), is adjacent to the Erin Mills 403 Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). The Site is located within a mall-based Node, which has recognized development potential as evidenced by the 2018 City of Mississauga Reimagining the Mall initiative and subsequent adoption of Mississauga Official Plan Amendment 115.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, mixed-use, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being directly in front of street-level transit services and in proximity to the MiWay Transitway network. Additionally, the Subject Lands are located within a comfortable walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Central Erin Mills as a vibrant, complete, 15-minute community.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

The draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 13 (Nodes) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

The draft Mississauga Official Plan introduces a new term – Strategic Growth Areas. We highlight that adoption of the term Strategic Growth Areas is consistent with and further implements the in-effect Regional policy framework. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area given the Site is located within the Central Erin Mills Major Node Character Area. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities as well as implement Provincial and Regional policy objectives.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear and requires modification. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to enable greater flexibility by encouraging phased developments to provide a range and mixture of housing units, rather than referencing housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a*

*minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Notwithstanding that the policy has been revised since the previous iteration, we remain concerned. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (no greater than 20%) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary



Zoning Areas. For clarity, the Subject Lands are not located within a delineated Inclusionary Zoning Area for the City of Mississauga, and therefore, is not subject to a policy requirement that affordable housing units are required. This was recently further confirmed by the Ontario Land Tribunal's Decision regarding the Phase 1 appeal of MOPA 115 whereby the Tribunal agreed that affordable housing policy requirements are not appropriate nor legal for lands in mall-based Nodes. Additionally, the policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning and in our opinion, contrary to in-effect legislative and policy frameworks. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. The policy also does not account for the diverging widths of streets across the City. For example, there is a diverse and variable network of laneways, local roads, arterial roads and highways. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and therefore, the width of the respective street onto which a building or structure fronts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance. .

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The angular plane requirement should be removed from the above-noted policy.

#### ***Section 8.6.1., Buildings and Building Types***

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the draft Official Plan presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. We are concerned with the description of high-rise buildings which is as follows:

*'c. High-rise buildings: they represent buildings with height maximums as prescribed by local area policies and land use designations. High-rise buildings, which can also be referred to as Tall Buildings in this Plan, provide transit-supportive densities and play an important role in allowing the city to meet its growth targets, especially within Strategic Growth Areas.'*

The above high-rise building characterization is concerning. Specifically, the Subject Lands are not subject to a Local Area Plan. Instead, the Subject Lands are subject to the Central Erin Mills Major Node Character Area policies and the applicable Mixed Use policies. The above characterization does not adequately capture the reality and does not provide for sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of Local Plan Area boundaries. We request that the high-rise building characterization be modified to recognize the existence and allow permission for tall buildings at appropriate locations across the City.

#### **Chapter 10: Land Use Designations**

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, the Subject Lands are designated 'Mixed Use'. This maintains a 'Mixed Use' designation on the Subject Lands, when compared to in-effect policy permissions.

Maintenance of the 'Mixed Use' designation is concerning, particularly based on the evolving policy framework for designated 'Mixed Use' lands. Section 10.2.6 of the draft Official Plan contains the parent Mixed Use policy framework which any development application must be evaluated for conformance against. We are concerned with Policies 10.2.6.2 and 10.2.6.3 as stated below.

*'10.2.6.2. The planned function of lands designated Mixed Use is to provide a variety of retail, service and other uses to support the surrounding residents and businesses. Development on Mixed Use sites that includes residential uses will be required to contain a mixture of permitted uses. This mix of uses is required in order to create complete communities with destinations that are close enough for walking and cycling to be the most attractive transportation option. In addition to mitigating traffic congestion, this enhances human health and reduces greenhouse gas emissions.'*

*'10.2.6.3. Redevelopment of Mixed Use sites must maintain the same amount of non-residential floor space.'*

The above-noted policies are concerning and require revision. Collectively, the above-noted policies are unnecessarily restrictive and may challenge the ability for lands to redevelop. Specifically, the policy requirement that a range of retail, service and other uses be provided can be a challenge for development proponents to accommodate and may challenge a proponent's ability to offer a sufficient and efficient non-residential floor area. Similarly, the policy requirement that existing non-residential floor area be replaced does not adequately accommodate the evolving context of communities and market trends. Furthermore, the policies noted above may hinder the development potential of designated Mixed Use lands and the lands' ability to support contextually appropriate development that is able to further implement Provincial, Regional and local policy objectives for compact, mixed-use, complete communities. Lastly, the above-noted policies do not satisfactorily reflect changing market trends nor does it enable a proponent to right-size the amount of non-residential area to be provided. Greater flexibility is needed to enable vibrant, compact, efficient redevelopment forms to be implemented in appropriate locations.

#### Chapter 13: Nodes

Revisions are contemplated in Chapter 13 for lands located within a Major Node or Community Node component of the City Structure. As stated above, the Site is located within the Central Erin Mills Major Node Character Area. As such, Section 13.1.1, General, Section 13.2, Major Nodes and Section 13.2.2, Central Erin Mills apply.

When considered collectively, we are concerned with the refined Nodes policy framework and in particular Policies 13.1.1.3, 13.2.2.1, 13.2.3.3.1, 13.2.3.5.1 and 13.2.3.9.1 as stated below.

*'13.1.1.3. Development applications within Nodes proposing a change to the designated land use, which results in a significant reduction in the number of jobs that could be accommodated on the site, will not be permitted unless considered through an official plan review or update.'*

*'13.2.2.1. For lands within a Major Node, a minimum building height of two storeys to a maximum building height of 25 storeys will apply, unless otherwise specified by the Character Area policies or Special Site policies.... '*

*'13.2.3.3.1. A minimum building height of three storeys and a maximum building height of 25 storeys will apply. Buildings without a residential component will have a minimum height of one storey.'*

*'13.2.3.5.1. Residential development permitted by any land use designation will include:*

- a. *a minimum 10 percent of housing units that are below-market for each development application proposing more than 50 residential units. This will be comprised of units targeted for a range of middle income households. Approximately half of these units will be larger, family-sized dwellings containing more than one bedroom.'*

*'13.2.3.9.1. The need for a development master plan will be determined through a pre-application meeting and in consultation with staff prior to application submission. Redevelopment of the existing Erin Mills Town Centre mall property will require a development master plan. Matters to be addressed by the development master plan may, among other matters, including the following: ....'*

As previously stated, we are concerned with policy requirements for non-residential replacement. In addition to this concern, the above-noted policy 13.1.1.3 which states that development will not be permitted if there is a significant (without defining how significant is to be understood or quantified) reduction in the number of jobs that can be accommodated is concerning, overly restrictive and requires modification. In our opinion, the policy does not adequately provide for flexibility nor incorporates the evolving community context.

When considered collectively, the above-noted policy framework provisions are concerning and may challenge the ability of the lands to develop in support of Provincial, Regional and local policy objectives. In our opinion, maintenance of the 25 storey maximum building height limit is unnecessarily restrictive and will challenge the ability for lands to accommodate compact, vibrant, mixed-use, efficient, transit-supportive development forms particularly when development must accommodate new roads, parkland or open space. Furthermore, maintenance of the 25 storey maximum building height is inconsistent with the variable building heights that have been approved by City Council in other Major Nodes across the City. In our opinion, the policy framework should be revised to enable the introduction of evaluation criteria to guide decisions on permissions for additional height.

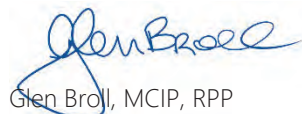
Finally, we are concerned with the policy requirement that a percentage of new housing units be provided as affordable, below-market housing units. The integration and delivery of affordable housing units in this manner places an additional burden on the development industry. Furthermore, the administration of affordable housing units is a responsibility best left with a government organization or the existing Housing Service Manager. We request that this policy be removed.

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP  
Managing Partner





cc. EMTC Holdings Inc.  
Councillor Reid  
Ben Phillips, Project Manager, Official Plan Review



## Partners:

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In Memoriam, Founding Partner:

Glen Schnarr

March 15, 2024

GSAI File: 792-013

Submitted electronically: [official.plan@Mississauga.ca](mailto:official.plan@Mississauga.ca)

Planning and Building Department  
City of Mississauga  
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Mississauga, ON L5B 3C1

Attention: Ben Philips, Project Manager

**RE: Mississauga Official Plan Review – Consolidated Draft Policies  
On behalf of Lakeview Community Partners Limited (Lakeview Village)  
1082 Lakeshore Road East and 800 Hydro Road**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission on behalf of our client, Lakeview Community Partners Limited, related to the lands municipally addressed as 1082 Lakeshore Road East and 800 Hydro Road (or known as “Lakeview Village”). We make this submission on the latest release of the draft, consolidated version of the City of Mississauga Official Plan (the “Official Plan”). Please accept and review this as an extension of our letters previously submitted to the City of Mississauga regarding their ongoing Official Plan review.

The following commentary is organized with a review of Schedules, and then the specific Chapter 13 section of the draft MOP specific to the Lakeview Village lands.

### Schedules

Schedule	Identified Issue	Requested Action
# 1: New: Innov EA	With this new defined employment area, how does this impact density, height, design, other etc.. regulations which are established through the development application review and approval process as well as the eMZO permissions?	City to clarify policy intent and impact on eMZO provisions.
# 2: Natural Systems (# 7N)	“Natural Hazard” limits reflect old mapping, and not the result of the development application review and approval processes which have refined the “Natural Hazard” limit (mostly contained to the realigned Serson Creek corridor). This also applies to similar graphics shown on Schedule 7N.	City to revise schedule.
# 3: Long Term St Network	As a general comment, it appears no other section of the City has such specificity with included road names. City Council has now approved road names for the subdivision which if names are to be included on the Schedule, they should be revised accordingly.	City to revise schedule.



# 4: Long Term Transit Network	<ol style="list-style-type: none"> <li>1. There are some inconsistencies with how Lakeshore Road East has been shown in prior iterations of the MOP and now in this draft MOP. What are the policy implications of having it noted as "Light Rail Transit Corridor" when the City's EA work is to have a BRT on this road.</li> <li>2. Further, it notes a "Future Enhanced Transit Route" loop in this Major Node again as it did in a previous version of the City's MOP. This appears to be the only part of the City where this applies. With the majority of the Major Node planning and approvals process complete, are there intentions for any different kind of transit service by MiWay within the lands which warrants noting this enhanced transit notion?</li> </ol>	City to provide clarification on the labels on the roads.
# 5: Long Term Cycling Routes	<ol style="list-style-type: none"> <li>1. Why does our client's lands have specificity of roads showing? It does not appear to be anywhere else.</li> <li>2. Based on the labels "Primary Off Road" and "Primary On-Road" mean, does this match the final design of cycling infrastructure as reviewed and approved by the City through the draft plan of subdivision detailed engineering process?</li> </ol>	City to revise schedule. City to provide clarification on the labels noted.
# 6: Designated ROW	<ol style="list-style-type: none"> <li>1. The City denotes a black dashed line for Lakefront Promenade, Street A, and for portions of Street H/Hydro Road. However, Street H/Hydro Road has been reviewed and approved by the City with a 25.4 m road width. The "26-35 m" label for that section of Street H/Hydro Road therefore conflicts with this City approval and thus needs to be revised, or an exception noted on the schedule for this road.</li> <li>2. The City should clarify why this Major Node has such road specificity compared to other areas in the City.</li> </ol>	City to revise schedule. City to provide clarification on the details noted.
# 7N: Land Use	<ol style="list-style-type: none"> <li>1. The northwest corner of Street A and Street H incorrectly depicts Residential Low Rise II when this block has been approved for Residential High Rise development. This is Block 8 on the affiliated draft plan of subdivision for our client's lands.</li> <li>2. The limit of the Major Node should include water (land holdings of LCPL and parts of subdivision) no different than the Port Credit Community Node.</li> </ol>	City to revise schedule.
# 8Q: PMTSA	<ol style="list-style-type: none"> <li>1. Remove all heights as noted specific to the area covered under the applicable eMZO for this PMTSA.</li> <li>2. There is inconsistency between Schedule #7N and this one. Further, as the eMZO provides flexibility in various built forms including many types of townhouses and apartment buildings, the Residential Medium Density (which we presume is the intended Residential Mid-Rise designation) should be removed and replaced with Residential High-Rise. Please see below additional policies which need to be added specific to our client's lands for this designation.</li> <li>3. The northwest corner of Street A and Street H incorrectly depicts Public Open Space when this block has been approved for residential development. This is Block 8 on the affiliated draft plan of subdivision for our client's lands.</li> <li>4. The schedule should be revised to remove linework in the middle of the node which doesn't appear to signify anything and to include the additional lands purchased by our client for the extension of Lakefront Promenade.</li> </ol>	City to revise schedule.



## Chapter 13

As the City is aware, the Lakeview Village lands are subject to an enhanced Minister's Zoning Order 91/23 dated May 12, 2023. This Order's intent, and permissions associated with it, was further confirmed by the Minister's letter to Acting Mayor Horneck dated February 9, 2024. In consideration of what the eMZO permits, the content of the draft MOP specific to the Lakeview Village lands are inappropriate and need to be amended. Sections need to be struck, or alternatively, exceptions need to be created in the MOP which exclude the Ogden Green and Cultural Waterfront (and potentially some Innovation Corridor) precincts from the broader policy framework. Other items have also been identified including where previous policies have been removed.

The following sections require amendments in consideration of the following:

With regards to height, built form, or design elements:

13.2.4.3 d.: To match the height permissions on our client's lands, the noted MOP statement should end with "...building typologies."

13.2.7 a. and c.: These provisions should be struck from applying to our client's lands, or alternative wording provided.

13.2.4.7.1: To address the issue of height and density distribution, it seems appropriate that a new provision "j." be added which excludes our client lands from the previous provisions (or provides alternative words clarifying how they apply in light of the eMZO provisions).

13.2.4.7.2: Similar to above, this provision should be removed as too many of the design guidelines conflict with regulatory permissions from the eMZO. A similar consideration should be given to 13.2.4.7.3.

13.2.4.7.4: As the eMZO provisions might conflict with the policy reference to "in keeping with", we would recommend this policy be removed. Alternatively, this policy needs to reference

13.2.4.7.6 to 13.2.4.7.8, 13.2.4.7.10, Map 13-4.5: These policies/map should be eliminated. Alternatively, if policy references are needed for the Rangeview Estates precinct, a new policy can be created to address that precinct.

Figure 13-6: With the final built-form distribution unclear on our client's lands, it is uncertain how this influences the Rangeview precinct. At a minimum, this Figure should reference excluding Lakeview Village.

13.2.4.7.14: As the distribution of height is subject to change over the future evolution of our client's lands, it is suggested that references in this section to Lakeview Village should be eliminated.

13.2.4.7.18 and 13.2.4.7.19: Similar to above, these policies are now obsolete and should be removed from the Ogden Green precinct section.

13.2.4.7.21 to 13.2.4.7.24 and 13.2.4.7.26: These policies are now obsolete and should be removed from the Cultural Waterfront precinct section.

(13.2.4.9 Land Use Designations) Residential Mid-rise, 13.2.4.9.4: This policy should note an exception for where this designation exists in both the Cultural Waterfront and Ogden Green precincts applicable for our client's lands. It should also be noted that on Schedule 8Q, there is no reference to this designation, but it is assumed this is meant to be the Residential Medium Density designation. The City needs to clarify.

(13.2.4.9 Land Use Designations) Residential Mid-rise, 13.2.4.9.5: It's not clear what the intention is of this policy as typical development approvals for a C4 or RA zone based project would have or likely have as-of-right commercial permissions for the project lands. The City should clarify if this policy suggests buildings that are not located in these locations, but with commercial at grade are in contravention of this policy.





(13.2.4.9 Land Use Designations) 13.2.4.9.6 Mixed Use: A new “c” or alternatively a new “d” should be written to exclude both the Cultural Waterfront and Ogden Green precincts from these policies as the eMZO regulations for the “C4” zoning permit various uses beyond those described in the draft MOP policies.

With regards to density or unit count:

13.2.1.1: Referencing a limit for a gross density doesn’t reflect the potential of exceeding that limit in line with Provincial directives and policies. This is a similar comment to the policy under 13.3.4.

13.2.4.3 Population and Employment Growth: The reference to population and jobs is incorrect and should be amended. There also appears to be a discrepancy where the population to employment ratio is noted, but in other draft MOP sections it is not.

13.2.4.7.13 a.: Remove reference to unit count.

Table 1 (Nodes 13-32): Unit count, built form splits/breakdown, and total unit counts should be revised/eliminated resulting from the eMZO.

With regards to other matters:

13.2.4.4: It is unclear why the lands are defined separately within an employment area. Does this impact the interpretation of the limits of the Major Node or other policies?

13.3.6.9 (previous Official Plan): The provisions to permit “POPS” is an opportunity for design teams to be creative with the potential of improving site development and programming and opportunities for public interaction. It is unclear why this has been removed as it is beneficial to the design process.

13.2.4.6: While LCPL applauds all proposed or future transit service considerations in the Major Node, it is unclear what the intent is of referring to “future enhanced transit”. As the subdivision design, and discussion with MiWay on establishing interim transit in the project lands has concluded, it is presumed transit options have been resolved and any future enhancement would only mean increasing levels of service for the project lands. In other words, it is unclear how there is a “range of transit services” available and why further City study is required with so many decisions confirmed for the project lands.

13.2.4.9 Land Use Designations (Residential High Rise): A new policy needs to be created to reflect the eMZO permissions for various built forms and the associated height permissions. The current draft policy framework has limitations which must be revised including:

- a. the permission for townhouse built form, as permitted through Residential High Rise which includes Residential Low Rise II only permits accessory townhouses which is in contrast to townhouse permissions on our client’s lands;
- b. the height limit as noted in 10.2.5.10 needs to be eliminated.

13.2.4.9 Land Use Designations (Greenlands and Public Open Space): A new policy (or policies for each designation) needs to be created which provides alternative wording to those under the general provisions in section 10.2.3 and 10.2.4. Specifically, in light of the aspirational park and waterfront visioning done to date which includes many non-traditional urban and waterfront park development scenarios including uses not listed in those designations, policy needs to be crafted reflecting the use permissions noted in the associated zones in the eMZO for these areas (G1-B and OS2). The current designations’ policies are applicable for typical suburban open space/park uses only.

(Contamination and Land Use Compatibility) 13.2.4.10.13: Since the original MOP wording for this section, a portion of our client’s project lands are subject to a Class 4 designation. This has the potential for a conflict with the wording of this policy which suggests all mitigation must be done by the “...new residential...” use. Either this policy should be revised, or a new 13.2.4.10.14 be



created to note the lands subject to the Class 4 designation, and appropriate policies written to address land use compatibility.

The City is aware that our client is currently discussing community benefits with the City and Province with regards to the unit increase resulting from the Order 91/23. As a result, we feel it is appropriate that a new provision be added under a section within the Official Plan (be it “Implementation” or another section which the City may deem appropriate to deal with this matter) which speaks to how, through a section 49(2) agreement, various content of that agreement fulfills various City requirements including affordable housing requirements, amongst other matters, which are spoken to broadly throughout the MOP. This new provision should indicate it is specific to the entire Major Node except for the Rangeview precinct lands.

The City should also include a new section 17.15 in the Implementation section to reference MZO/eMZO’s. The new provision should note once they are in-effect on subject sites, they over-ride provisions or policies noted in the MOP and all development is deemed to comply with the MOP. This is important to address on-going long term development of the Lakeview Village project lands with new section 47 process/agreements required, and with potential approvals required for site-specific deviations to the zoning regulations from the eMZO. This is exemplified above with the commentary on policy 13.2.4.10.13. This is additional way to provide clarity on how to address inconsistencies specific to our client’s lands, but also for other sites in the City subject to Ministerial Orders.

Thank you for the opportunity to provide comments on the City’s draft consolidated Official Plan. We would be happy to discuss our comments with staff, if necessary.

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP  
Managing Partner

c: Lakeview Community Partners Limited (B. Sutherland)

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 893-001E

Via Email: [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)

Chairman and Members of the Mississauga  
Planning and Development Committee  
c/o Ms. Angie Melo, Legislative Co-ordinator  
City of Mississauga  
Clerks Department  
300 City Centre Drive  
Mississauga ON, L5B 3C1

To Whom It May Concern:

**RE      Mississauga Official Plan Review – February 2024 Draft**  
**City File: CD.02-MIS**  
**4100 Ponytrail Road and 1850 Rathburn Road E**  
**Owner: Forest Park Circle Ltd.**  
**City of Mississauga, Region of Peel**

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Glen Schnarr & Associates Inc. is pleased to make this submission regarding the City of Mississauga Official Plan (the “Official Plan”) review on behalf of Forest Park Circle Ltd., owner of 4100 Ponytrail Road and 1850 Rathburn Road East (herein referred to as the “Subject Lands”). The Subject Lands were subject to site-specific Official Plan Amendment and Zoning By-law Amendments, approved in 2018 which assigned a Special Site in the Rathwood Neighbourhood Character Area “Special Site 3” and zoned the property “RA4-46”. The Subject Lands are designated as “Residential High Density” on the in-effect Official Plan Schedule 10 – Land Use Designations. As per the draft Official Plan, the Subject Lands are proposed to be redesignated as “High-Rise” in accordance with the proposed new land use designations. The Subject Lands are currently in Site Plan Approval process, being processed under application number “SP 17-3 W3”.

GSAI has been monitoring the Official Plan review process since Fall 2019. We submitted our initial concerns and comments regarding Bundle 3 policies in a comment letter dated June 23, 2023, noting that detailed comments would be forthcoming, as well as a follow up letter dated July 31, 2023. Further to our previous letters, please find attached our scoped comments with regards to the Subject Lands (Appendix 1).

Thank you for the opportunity to provide comments. We look forward to working with staff through next steps.



**GLEN SCHNARR & ASSOCIATES INC.**  
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

6.5

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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**Jennifer Staden, MCIP, RPP**  
**Associate**

cc.      *Forest Park Circle Ltd.*  
         *Ben Phillips, Project Manager, Official Plan Review*



APPENDIX 1:

May 2023 Draft Policy	GSAI response – July 2023	February 2024 Draft Policy	GSAI response – March 2024
<b>Rental Housing and Affordable Housing</b>			
5.1.4 To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units will include a minimum of 30 per cent of the total number of units as 2-bedroom units and a minimum of 10 per cent of the total number of units as 3-bedroom units. The City may reduce these requirements where development is providing: social housing or other publicly funded housing; or specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients, employees or people with special needs.	As previously noted, in our opinion, the above-noted draft policies should be modified. More specifically, Policy 5.1.4 should be modified to encourage a selection of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for a large percentage (40%) of units to be of a certain type will challenge Provincial and Regional policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis. Furthermore,	5.2.4 To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing: a. social housing or other publicly funded housing; or b. specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients, employees or people with specific needs.	<p>We acknowledge that the policy has been revised from “will include” to “are encouraged to include”. We thank staff for addressing our previous comment.</p> <p>It is our opinion that despite the revisions to this policy requesting a large percentage of units to be a specific type could still challenge Provincial and Regional policy objectives of delivering a variety of affordable and attainable housing options for current and future residents.</p> <p>The policy statement that phased developments include a range and mix of housing types and the policy statement that 50% of new housing units be larger, family-sized units are concerning. While we understand the intent of the policies is to encourage developments that enable housing choice, including for families, the policies as written are prohibitive and will challenge the delivery of needed housing units, in appropriate locations. We request that the policies be amended to encourage a range of dwelling units be provided in each development phase, where phased development is contemplated and that policy 5.2.4 be amended to encourage a reduced percentage (20% or less) of family-sized units to be provided.</p>
	No formal comment previously.	5.2.2. Phased development will have a range and mix of housing types for each development phase.	
5.1.7 The City will advocate to the Federal and Provincial governments to increase funding and incentives as well as improved cost-sharing arrangements that support the development of permanent and long-term affordable housing to	Policy 5.1.7, as contemplated, should be modified to clarify that affordable housing units are required to be provided in select, strategic locations such as Protected Major Transit Station Areas, in accordance with the	5.2.7 The City will Support the Region as the Housing Service Manager by advocating to the Federal and Provincial	GSAI maintains our previous comment. This policy should be revised to clarify affordable units should be required in strategic locations (Major

achieve the City and Regional objectives and to support full implementation of the Regional Housing Strategy and the Peel Housing and Homelessness Plan.	Regional and local Inclusionary Zoning policy framework. The above-noted policies are blanket policies which seem more appropriate in a guideline (similar to City of Toronto and their “Growing Up” Guidelines). If the objective of these policies is to deliver more affordable and rental housing, the City should also consider using their ability to incentivize this type of housing (Development Charges refunds, streamlined processes, etc.), to offset market demand requirements.	governments to increase funding and incentives as well as improved cost-sharing arrangements that support the development of permanent and long-term affordable housing. This will help achieve the City’s objectives and support full implementation of the Regional Housing Strategy and the Peel Housing and Homelessness Plan.	Transit Station Areas) where Inclusionary Zoning is applicable.								
<p><i>Table 1 – Peel-Wide New Housing Unit Targets</i></p> <table><tr><th>Target Area</th><th>Targets</th></tr><tr><td>Affordability</td><td>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to <u>low income</u> households</td></tr><tr><td>Rental</td><td>That 25% of all new housing units are rental tenure</td></tr><tr><td>Density</td><td>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</td></tr></table>	Target Area	Targets	Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to <u>low income</u> households	Rental	That 25% of all new housing units are rental tenure	Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy		Table remains unchanged	The above-noted policies and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property’s location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.
Target Area	Targets										
Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to <u>low income</u> households										
Rental	That 25% of all new housing units are rental tenure										
Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy										
5.2.4.3 Mississauga will ensure purpose-built rental apartments are retained to provide housing options for	As previously discussed in the July 31, 2023 letter, GSAI is of the opinion that while rental units should be	No changes to draft policy.	GSAI maintains our previous position. While rental units should be encouraged (both through								

<p>varying lifestyle and economic needs. The City may prohibit and regulate the demolition of residential rental properties and may prohibit and regulate the conversion of residential rental properties to a purpose other than the purpose of a residential rental property, in accordance with the provisions of the Municipal Act.</p> <p>5.2.4.4 The City will regulate:</p> <p>a) the conversion of residential rental units to any other form of tenure in properties with six or more dwelling units.</p> <p>b) the demolition of existing residential rental units in properties with six or more dwelling units.</p> <p>5.2.4.7 Demolition or conversion of rental properties will only be permitted where:</p> <p>a) the average rental vacancy rate within the City is at or above three (3) percent over the preceding three year period;</p> <p>b) the conversion to ownership housing would result in the creation of affordable housing; or</p> <p>c) the demolition or conversion is needed to address existing health and safety issues through retrofits and renovations, which would result in an increase in rental levels above the threshold for affordability.</p>	<p>encouraged (both through replacement and new units), the above-noted policies as currently written are very prohibitive. The policies do not account for very old rental buildings which need replacement, nor do they account for replacement rental units being incorporated with a mix of uses to create more complete communities. We believe the threshold of 6 units is too low and could result in being cost prohibitive for redevelopment projects. With respect to 5.2.4.7, we believe more flexible language should be used to account for outright stopping of projects with a 2.99% vacancy rate. As well, the way we understand 5.2.4.7 is this only permits renovations, not demolition and replacement. Demolition permissions should be added.</p> <p>With respect to affordable housing, a more effective approach might be to incentivize developers in ways such as, speeding up process of these units/ projects, reduced fees, no Development Charges, etc. We trust the Official Plan policies will follow direction from the Province with respect to rental replacement and be consistent with/conform to all applicable Provincial legislation.</p>	<p>replacement and new units), the above-noted policies as currently written are very prohibitive. The policies do not account for very old rental buildings which need replacement, nor do they account for replacement rental units being incorporated with a mix of uses to create more complete communities. We believe the threshold of 6 units is too low and could result in being cost prohibitive for redevelopment projects. With respect to 5.2.4.7, we believe more flexible language should be used to account for outright stopping of projects with a 2.99% vacancy rate. As well, the way we understand 5.2.4.7 is this only permits renovations, not demolition and replacement. Demolition permissions should be added.</p> <p>With respect to affordable housing, a more effective approach might be to incentivize developers in ways such as, speeding up process of these units/ projects, reduced fees, no Development Charges, etc. We trust the Official Plan policies will follow direction from the Province with respect to rental replacement and be consistent with/conform to all applicable Provincial legislation.</p>
<p>No changes to draft policy.</p>	<p>No changes to draft policy.</p>	<p>No changes to draft policy.</p>
<p><b>Changes to Land Use Designations and Maximum Heights</b></p>		
<p>Lands designated as "Residential High-Rise" will permit: "dwelling units in buildings that are above eight storeys, with a maximum as specified in the Character Area or Special Site provisions. If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property."</p>	<p>As noted in the GSAI letter dated July 31, 2023, we have great concerns with embedding maximum heights into Official Plan policies. Furthermore, in the draft policies, GSAI has concerns with this policy, specifically that maximum heights will not be greater than existing heights on site, as this could stifle redevelopment opportunities and architectural creativity. If a site is being redeveloped, it shouldn't be restricted to the height that was deemed appropriate at a previous time</p>	<p>GSAI maintains our previous position. We have great concerns with embedding maximum heights into Official Plan policies. Furthermore, in the draft policies, GSAI has concerns with this policy, specifically that maximum heights will not be greater than existing heights on site, as this could stifle redevelopment opportunities and architectural creativity. If a site is being redeveloped, it</p>

	(sometimes decades earlier). This seems to contradict the very intent and purpose of intensification and considerations of the ever-evolving Provincial policy framework.		shouldn't be restricted to the height that was deemed appropriate at a previous time (sometimes decades earlier). This seems to contradict the very intent and purpose of intensification and considerations of the ever-evolving Provincial policy framework.
<b>Neighbourhoods</b>			
14.1.1 For lands within a Neighbourhood, a maximum building height as prescribed by the applicable Land Use Designation (removed of four storeys) will apply unless Character Area policies specify alternative building height requirements or until such time as alternative building heights are determined through the review of Character Area policies.	GSAI disagrees with blanket height maximums which do not consider local or site context (this is further explained in our July 31, 2023 comment letter). Height consideration should be extended beyond the right-of-way width and consider the site context and existing conditions (buffers, park space etc.), building orientation and placement, utility uses, various types of open space uses). All of these factors can incorporate "taller" heights for an appropriate and desirable development.	No changes to draft policy.	GSAI maintains our previous position. We disagree with blanket height maximums which do not consider local or site context (this is further explained in our July 31, 2023 comment letter). Height consideration should be extended beyond the right-of-way width and consider the site context and existing conditions (buffers, park space etc.), building orientation and placement, adjacent land uses (commercial uses, utility uses, various types of open space uses). All of these factors can incorporate "taller" heights for an appropriate and desirable development.
14.1.3 For lands within a Neighbourhood that are not subject to a Residential Land Use Designation, a maximum building height of four storeys will apply unless Character Area policies specify alternative building height requirements or until such time as alternative building heights are determined through the review of Character Area policies.	Similar to commentary above, policy 14.1.4 (a) is too restrictive as land subject to a development application may be large enough, and contextually appropriate for alternative built forms including taller building elements. Also, we believe policy 14.1.4 (c) should be revised to also include lands along "Corridors" and sites in close proximity to open spaces, commercial uses (i.e. plazas, malls) and other uses that support and are supported by, residential land uses.	No changes to draft policy.	
14.1.1.4 The City will support the provision of a full range of housing options, built forms and compatible uses within neighborhoods that: a) Ensure housing forms are generally within the low-rise scale, b) Promote a variety of residential built forms and arrangements, c) Direct neighbourhood-appropriate higher density uses to locate within existing apartment sites and commercial centres, along Neighbourhood Arterials.		14.1.1.4 The City will support the provision of a full range of housing options, built forms and compatible uses within neighborhoods that:  a. Ensure housing forms are generally within the low-rise scale unless otherwise permitted by Character Area policies.  b. Promote a variety of residential built forms and arrangements that respond to the needs of the City's current and future residents and that	



		<p><i>prioritizes affordable and barrier free units.</i></p> <p><i>c. Direct neighbourhood-appropriate higher density uses to locate within existing apartment sites and commercial centres, along Neighbourhood Arterials or as directed by Character Area policies.</i></p> <p><i>d. Ensure development provides appropriate transitions in height, built form and density to the surrounding lands.</i></p> <p><i>e. Protect existing local services that support complete communities, including compatible small-scale retail and service uses, in accordance with permitted uses in this Plan.</i></p> <p><i>No changes to draft policy.</i></p>	<p>GSAI maintains our previous position. We believe this policy should reference the criteria noted above in 14.1.4 (as revised by GSAI) as appropriate exceptions to intensification within neighbourhoods.</p> <p><b>In addition, we believe the Official Plan should recognize “clusters” within a Neighbourhood,</b> which include uses such as open space, commercial, and various built forms, where there should be a focus on promoting intensification opportunities for complementary commercial and/or high-rise uses. These “clusters” would compliment and supplement the existing City hierarchy and address parts of the City that aren’t</p>
<p><i>14.1.1.5 Neighbourhoods will not be the focus for major intensification and should be regarded as residential areas where the general building scale and lot fabric are to be maintained.</i></p>	<p>GSAI believes this policy should reference the criteria noted above in 14.1.4 (as revised by GSAI) as appropriate exceptions to intensification within neighbourhoods.</p> <p>In addition, we believe the Official Plan should recognize “clusters” within a Neighbourhood, which include uses such as open space, commercial, and various built forms, where there should be a focus on promoting intensification opportunities for complementary commercial and/or high-rise uses. These “clusters” would compliment and supplement the existing City hierarchy and address parts of the City that aren’t captured in the City hierarchy as it exists today. The Subject Property is an ideal example of being a</p>		

	<p>portion of such a potential “cluster” as an under-utilized site with existing higher density development that is also surrounded by open space uses and commercial uses. This “cluster” or minor node (residential high-density uses, proximate commercial uses, walkable to transit and adjacent to open spaces) is an example of a site which is similar to others in neighbourhoods throughout the City where there is opportunity for additional height/intensification to achieve a true complete community.</p>		<p>captured in the City hierarchy as it exists today. The Subject Property is an ideal example of being a portion of such a potential “cluster” as an under-utilized site with existing higher density development that is also surrounded by open space uses and commercial uses. This “cluster” or minor node (residential high-density uses, proximate commercial uses, walkable to transit and adjacent to open spaces) is an example of a site which is similar to others in neighbourhoods throughout the City where there is opportunity for additional height/intensification to achieve a true complete community.</p>
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Partners: 6.5

**Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 1409 – 001, 1409 – 002

(Via Email) [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)

Chairman and Members of the Planning and Development Committee  
 c/o Ms. Angie Melo, Legislative Coordinator  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051  
 Kings Mill Homes Development Inc. & Kings Mill Development 2 Inc.  
 150 and 180 Rutledge Road, City of Mississauga**

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Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to Kings Mills Homes Development Inc. and Kings Mill Development 2 Inc. (collectively, the 'Owners') of the lands municipally known as 150 and 180 Rutledge Road, in the City of Mississauga (the 'Subject Lands'). On behalf of the Owners and further to our previous Comment Letter, dated June 26, 2023, we are pleased to provide this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

**Background Information:**

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands, which are municipally known as 150 Rutledge Road and 180 Rutledge Road, are located on the west side of Rutledge Road, north of Tannery Street. The lands municipally known as 150 Rutledge Road and referred to as 'Vic 1' are currently occupied by the below-grade structure, while the lands municipally known as 180 Rutledge Road and referred to as 'Vic 2' are currently occupied by a temporary Sales Office structure. Based on the in-effect planning policy framework, the Subject Lands are located within the Streetsville community, within the Streetsville Community Node Character Area, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the planned

Streetsville Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and are designated ‘Residential High Density’ (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Subject Lands collectively and individually have recognized development potential. This is further supported by the Subject Lands’ inclusion within the Streetsville Community Node Character Area, Special Site 3 Policy.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, transit-supportive development to occur. This is strengthened by the Subject Lands’ locational characteristics of being within 400 metres of various street-level transit services and the Streetsville GO Station. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Streetsville as a vibrant, complete, 15-minute community.

In addition, it is important to note that the Subject Lands are subject to active development applications. Specifically, Vic 1 is subject to an active Site Plan Approval (‘SPA’) Application (City File No. SP 21-155 W11) to permit a 5-storey residential apartment development, while Vic 2 is subject to an active Pre-Consultation Application (City File No. DARC 23-60 W11) to permit a 10-storey residential apartment structure and 4 townhouse dwellings. Collectively, these above-noted applications (hereinafter the ‘Applications’) seek to introduce vibrant, compact development on the Subject Lands.

The proposed developments have been planned and designed to implement contextually appropriate development and further implement the development vision for compact, pedestrian-oriented development as outlined in the in-effect policy framework.

#### **Concerns Related to the Draft Mississauga Official Plan 2051:**

We have reviewed the draft Mississauga Official Plan 2051 (‘Draft OP’), released on February 12, 2024. Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 13 (Nodes) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns as outlined below.

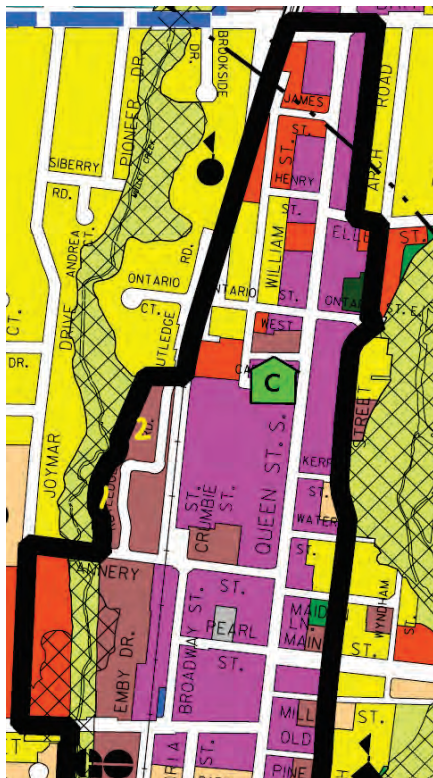


## Chapter 10: Land Use

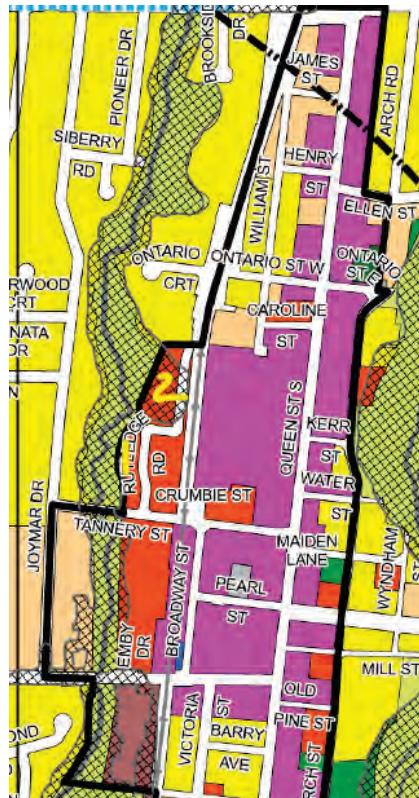
The Draft OP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning.

As stated above, the Subject Lands are located on the west side of Rutledge Road, north of Tannery Street, west of the CP railway tracks in Streetsville and comprise an area of 3.13 acres. The Subject Lands, identified below with the numbers 1 and 2 are currently designated “Residential High Density” in the current OP. The property at 180 Rutledge, known as Vic 1, has already received rezoning approvals a submission has been made for a 10 storey building, to be known as Vic 2, for the property at 150 Rutledge Road in accordance with the current OP land use designation. The subject lands are within the Streetsville Community Node. Under the current OP, Community Nodes are identified as areas within the City Structure where higher density concentrations of Mixed Use and High Density development are expected to occur. Under the proposed new draft Mississauga OP, the designation of the subject lands (identified with in yellow “1” and “2”) is proposed to change from Residential High Density to Residential Mid-Rise.

Current 2010 OP



Draft New OP



Firstly, the newly proposed Residential Mid-Rise designation on this site is tantamount to a down-designation, not in accordance in sound planning in the context of evolving policy to support intensification, and unacceptable to our client.

This proposed designation permits maximum heights of 8 storeys or heights that do not exceed the width of the right-of-way (ROW) the site fronts onto. In this case the ROW is Rutledge Road which, as a local road, has a designated ROW width of 20-22 m, which is roughly equivalent to 7 storeys. In our opinion, this proposed designation is inappropriate and the existing Residential High Density designation should be retained. This down designation is inconsistent and counter to other recent policy and development initiatives. In addition to being within a Transit Based Community Node given its walkability and proximity to the Streetsville GO station and Main Street Commercial uses, the subject lands are also within a “planned MTSA” in the Region of Peel OP and soon within the Mississauga OP. Section 5.6.19.15 of the Region of Peel OP states it is the Region’s policy to “direct the local municipalities to establish policies in their official plans that identify Planned Major Transit Station Areas and protect them for transit-supportive densities, uses and active transportation connections.”

As a centrally located site in Streetsville within 800 m walking distance to the Streetsville GO Station and within walking distance of main street retail and commercial activities, this site has the locational attributes to support higher density which is why it was designated as such in the current OP.

We see no logical planning rationale for lowering this designation in the new draft OP and request that the current designation be retained.

Secondly, the land use mapping in the draft new OP extends a “Natural Hazards” designation across the entire Vic 2 (150 Rutledge Road) lands that extends over to the CP Rail tracks. Considering the original subdivision for these lands was approved in excess of 20 years ago, the Vic 2 lands have been staked for top-of-bank and stable slope line multiple times by the CVC and as recent as the summer of 2023, and the site has been cleared and filled and currently houses a temporary sales office, this Natural Hazard overlay is inaccurate and should be deleted or revised to reflect current site conditions and delineated top-of-bank and stable slope lines that have been walked, surveyed and confirmed in the field with CVC staff.

### **Chapter 3: Directing New Development**

The Draft OP continues to provide guiding policy direction for how growth and development is to be managed in accordance with a City Structure. The proposed City Structure, as presented on Schedule 1, remains largely unchanged from the in-effect Mississauga Official Plan. In the case

of the Subject Lands, the proposed City Structure continues to identify the Site as being located within the Community Node component of the City Structure.

The Draft OP also introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area given the Site is located within the Streetsville Community Node Area. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities as well as implement Provincial and Regional policy objectives.

## **Chapter 5: Housing Choices and Affordable Homes**

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 Draft OP in May of 2023. Notwithstanding that the policy has been revised since the previous iteration, we remain concerned. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (no greater than 20%) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to

existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

*‘5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1’*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the specific City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property’s location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning and in our opinion, contrary to in-effect legislative and policy frameworks.

We strongly recommend that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of the City’s Inclusionary Zoning.



## **Chapter 8: Well Designed Healthy Communities**

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires further consideration and modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique attributes and its context. The policy also does not account for the diverging widths of streets across the City. For example, there is a diverse and variable network of laneways, local roads, arterial roads and highways. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and therefore, the width of the respective street onto which a building or structure fronts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations.

This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. Based on the above, we recommend that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general*

*application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy should be revised to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The 45 degree angular plane requirement should be removed from the above-noted policy.

#### *Section 8.6.1., Buildings and Building Types*

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the Draft OP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. Of relevance to the Subject Lands, the Draft OP framework would characterize the proposed built form as presented in the active development applications as a mid-rise and high-rise built form, respectively. For clarity, these built forms are characterized as follows:

- 'b. Mid-rise buildings: in Mississauga, mid-rise buildings are generally higher than four storeys with maximum heights as prescribed by area-specific policies and land use designations. Their height should not exceed the width of the right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings can accommodate many uses and provide transit-supportive densities yet are moderate in scale, have good street proportion, allow for access to sunlight, have open views to the sky from the street, and support high-quality, accessible open spaces in the block. Mid-rise buildings provide good transition in scale to adjacent low-rise built forms..*
- c. High-rise buildings: they represent buildings with height maximums as prescribed by local area policies and land use designations. High-rise buildings, which can also be referred to as Tall Buildings in this Plan, provide transit-supportive densities and play an important role in allowing the city to meet its growth targets, especially within Strategic Growth Areas.'*

We object to the above-noted built form characterizations. The above characterizations do not adequately capture the reality of development and do not provide for sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of Local Plan Area

boundaries. Furthermore, we have continued concerns and objections to the characterization of a mid-rise building, such as that proposed at Vic 1, as a building having to have a relation to the street upon which it fronts. For these reasons, we request that the mid-rise and high-rise building characterizations be modified to recognize the existence and allow permission for taller built forms at appropriate locations across the City.

### **Chapter 11: Transit Communities**

The Draft OP proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144 as well as previous City initiatives. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

### **Conclusion:**

In summary, we are concerned about the proposed policy directions outlined in the Draft OP and request that modifications as identified throughout this letter be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Jim Levac, MCIP, RPP  
Partner

cc. Owner  
Councillor Butt



Ben Phillips, Project Manager, Official Plan Review  
Barry Horosko, Horosko Planning Law



*Via Email*

July 26, 2023

File: 1409-001/1409-002

City of Mississauga  
Planning and Building Department  
City Planning Strategies Division  
300 City Centre Drive,  
Mississauga ON, L5B 3C1

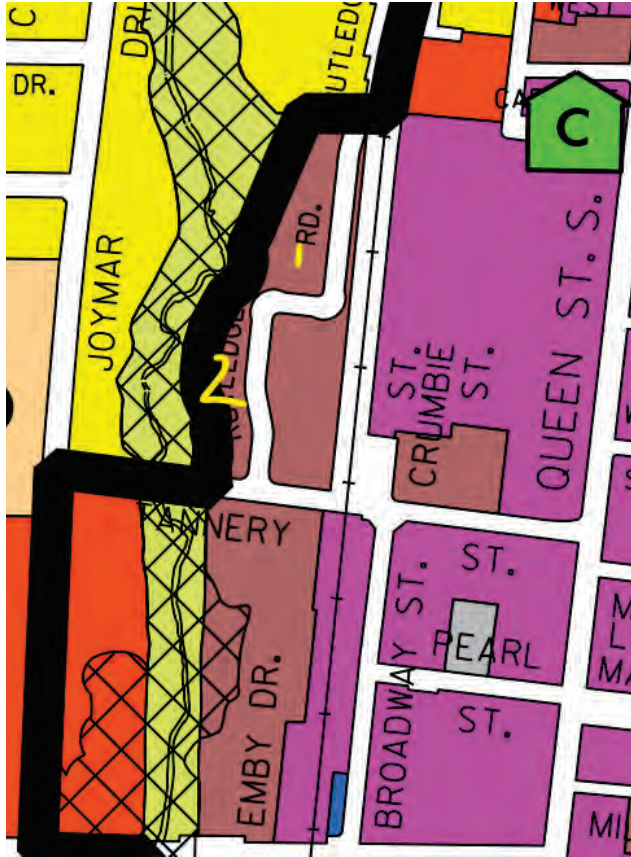
Attn: Ms. Sharleen Bayovo, Project Lead  
Mississauga Official Plan Review

Re: **Mississauga Official Plan Review – Bundle # 3**  
**Comments on Proposed New Official Plan Policies**  
**Kings Mill Development Inc. (150 Rutledge Road)**  
**Kings Mill Homes Development Inc. (180 Rutledge Road)**

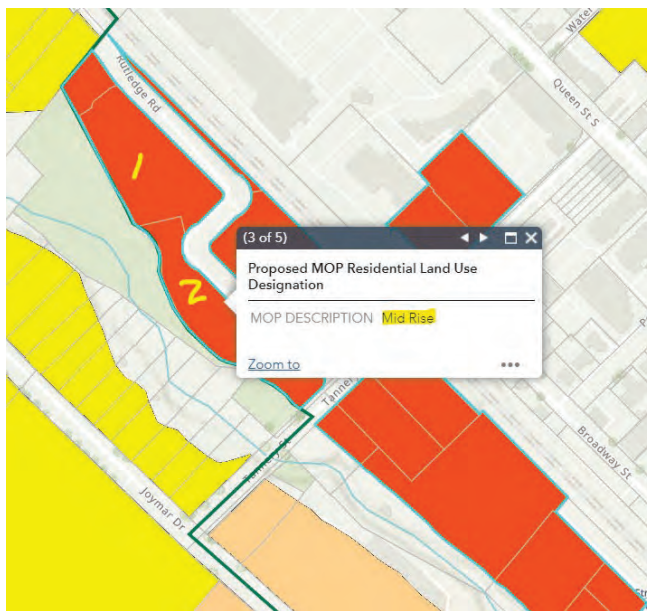
Glen Schnarr & Associates Inc. (GSAI) are planning consultants to Kings Mill Development Inc. and Kings Mill Homes Development Inc., registered owners of two properties located at 150 Rutledge Road and 180 Rutledge Road respectively in Streetsville. We recognize that the Bundle # 3 policies are still of a preliminary nature, but appreciate the opportunity to review and comment on a new emerging policy framework before a draft consolidated new Official Plan is released to the public. We appreciate any consideration you are able to provide at this early stage in the process.

The two parcels are identified as sites numbered “1” and “2” on the land use mapping except from the 2010 Mississauga Official Plan. Both of these sites are currently designated “Residential High Density” in the 2010 Mississauga Official Plan. These lands are within the Streetsville Community Node which is one of several designated “Transit Based Nodes” in Mississauga, the others being Port Credit, Cooksville and Dixie/Dundas. Community Nodes are areas designated to attract concentrations of mixed and higher density uses. The proposed Bundle # 3 Land Use Schedule and corresponding new Section 10.1.5.12 policies propose a new “Mid-Rise Residential” designation on these lands as depicted below. The proposed new Mid-Rise policies limit heights under the Mid-Rise designation to 8 storeys unless increased heights are permitted under Local Area Plan Character Area of Special Site Policies which allow heights to increase to a maximum of 12 storeys.

**2010 Mississauga Official Plan – High Density Residential**



**Bundle # 3 Proposed Revisions - Midrise Residential**



What is proposed is tantamount to a “down designation” of this site from a High-Rise designation to a Mid-Rise designation, seemingly without any justification considering the site is within a Transit Based Community Node. In addition, the subject lands are identified in the Regional Official Plan as a Planned MTSA given their proximity to walkable public transit, namely the Streetsville GO station which is within 800 m of the site. Section 5.6.19.15 of the Regional Official Plan states that it is the Region’s policy to ***“direct the local municipalities to establish policies in their Official Plans that identify Planned Major transit Station Areas and protect them for transit-supportive densities, uses, and active transportation connections.”*** As such, we would respectfully request that the Residential High Density designations be maintained on these sites. On the 150 Rutledge Road site, our client has submitted a proposal for a 10 storey residential condominium development. The proposal has been before a DARC 1 meeting, a formal complete submission has been made and if going through the DARC 2 process and a Councillor hosted Community meeting has been held.

We thank you for the opportunity to provide input into this major component of the forthcoming new consolidated Official Plan and trust that these comments will be taken into consideration. In the interim, please contact the undersigned via email or on cell # (905) 580-2854 if you have any questions or require any additional information. Thank you.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



---

Jim Levac, MCIP, RPP  
Partner

Copy: Michael Frustaglio/Louis Frustaglio, Forest Green Homes



Partners: 6.5

**Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:***Glen Schnarr**

March 15, 2024

File: 746-039

Via Email: [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)

Chairman and Members of the Mississauga  
Planning and Development Committee  
c/o Ms. Angie Melo, Legislative Co-ordinator  
City of Mississauga  
Clerks Department  
300 City Centre Drive  
Mississauga ON, L5B 3C1

To Whom It May Concern:

RE: Draft Mississauga Official Plan  
Statutory Public Meeting  
51, 57 Tannery Street & 208 Emby Drive  
Comments OBO Montcrest Asset Management

Glen Schnarr and Associates Inc. (GSAI) act for Montcrest Asset Management who own multiple properties throughout the City of Mississauga. Our most recent submission on the ongoing Official Plan (OP) Review is dated July 26, 2023 and is attached to this submission. Montcrest has a number of comments related to proposed new Official Plan policies as well as specific to the above-noted property. Comments on the new draft Official Plan in relation to this property are summarized as follows:

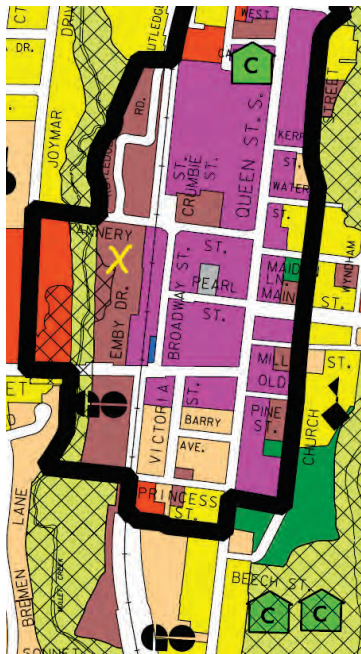
Proposed Midrise Designation: 51, 57 Tannery Street and 208 Emby Drive

The subject lands are located south of Tannery Street, west of the CP railway tracks in Streetsville Drive and comprise an area of 4.58 acres. The site is currently designated "Residential High Density" as shown below. The subject lands are within the Streetsville Community Node. Under the current OP, Community Nodes are identified as areas within the City Structure where higher density concentrations of Mixed Use and High Density development are expected to occur. Under the proposed new draft Mississauga OP, the

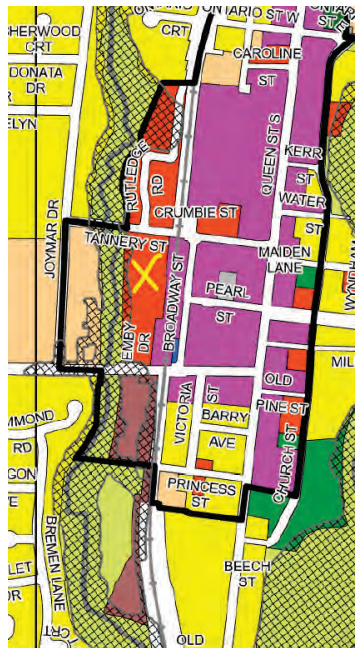


designation of the subject lands (identified with a yellow “X”) is proposed to change from Residential High Density to Residential Mid-Rise. Montcrest have had a number of preliminary meetings and DARC meetings with City staff and are in the process of preparing a formal OPA/rezoning submission to permit 12 and 14 storey highrise buildings on this site in accordance with the current Residential High Density Designation.

Current 2010 OP



Draft New OP



The newly proposed Residential Mid-Rise designation on this site is tantamount to a down-designation and unacceptable to our client. This proposed designation permits maximum heights of 8 storeys or heights that do not exceed the width of the right-of-way (ROW) the site fronts onto. In this case the ROW is Tannery Street which, as a local road, has a designated ROW width of 20-22 m, which is roughly equivalent to 7 storeys. In our opinion, this proposed designation is inappropriate and the existing Residential High Density designation should be retained. This down designation is inconsistent and counter to other recent policy and development initiatives. The subject lands are also within a “planned MTSA” in the Region of Peel OP and soon within the Mississauga OP. Section 5.6.19.15 of the Region of Peel OP states it is the Region’s policy to “*direct the local municipalities to establish policies in their official plans that identify Planned Major Transit Station Areas and protect them for transit-supportive densities, uses and active transportation connections.*” As a centrally located site in Streetsville within 800 m walking distance to the Streetsville GO Station and within walking distance of main street retail and commercial

activities, this site has the locational attributes to support higher density which is why it was designated as such in the current OP. We see no logical planning rationale for lowering this designation in the new draft OP and request that the current designation be retained.

### General Proposed Official Plan Policies

We have reviewed the draft Mississauga Official Plan 2051 ('Draft OP'), released on February 12, 2024. Overall, the draft policies propose revisions to Chapters 5 (Housing Choices), 8 (Well Designed Healthy Communities), 11 (Transit Communities) and select Schedules, among others. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns as outlined below.

#### ***Chapter 5: Housing Choices and Affordable Homes***

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types will be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to enable greater flexibility by encouraging phased developments to provide a range and mixture of housing units, rather than referencing housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix*

*of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 Draft OP in May of 2023. Notwithstanding that the policy has been revised since the previous iteration, we remain concerned. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (no greater than 20%) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing</i>

	<i>and Homelessness Plan and Regional Housing Strategy</i>
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The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the specific City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning and in our opinion, contrary to in-effect legislative and policy frameworks. We strongly recommend that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of the City's Inclusionary Zoning.

### ***Chapter 8: Well Designed Healthy Communities***

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires further consideration and modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique attributes and its context. The policy also does not account for the diverging widths of streets across the City. For example, there is a diverse and variable network of laneways, local roads, arterial roads and highways. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and therefore, the width of the respective street onto which a building or structure fronts. Furthermore, a



limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. Based on the above, we recommend that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance. .

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy should be revised to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The 45 degree angular plane requirement should be removed from the above-noted policy.

### *Buildings and Building Types*

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the Draft OP presents the refined built form policy framework and provides a characterization of how each

built form is to be generally understood. We are concerned with the built form characterizations. The characterizations, as drafted, do not adequately capture the reality of development forms and do not provide for sufficient flexibility to accommodate a range and diversity of built forms at appropriate locations, that are compatible with the surrounding context. For the above-noted reasons, we request that the building characterizations be modified to recognize the existence and allow permission for these diverging built forms at appropriate locations across the City.

We trust that these comments and concerns will be considered and addressed as the new OP proceeds through further public consultation and appreciate the opportunity to provide comments.

Yours truly,



Jim Levac, MCIP, RPP  
Partner

Copy: Tim Jessop, Montcrest Asset Management

*Via Email*

July 26, 2023

File: 746-039

City of Mississauga  
Planning and Building Department  
City Planning Strategies Division  
300 City Centre Drive,  
Mississauga ON, L5B 3C1

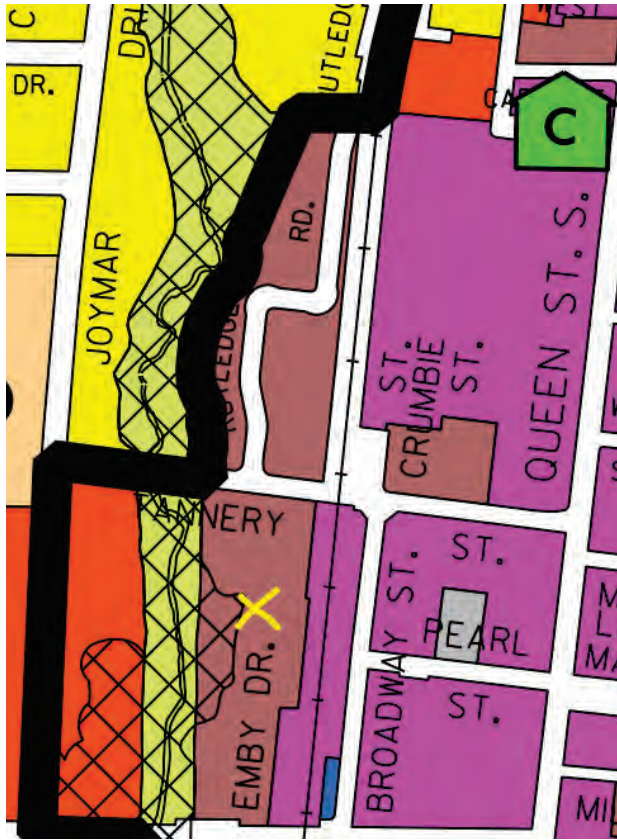
Attn: Ms. Sharleen Bayovo, Project Lead  
Mississauga Official Plan Review

Re: **Mississauga Official Plan Review – Bundle # 3**  
**Comments on Proposed New Official Plan Policies**  
**51 & 57 Tannery Street and 208 Emby Drive**  
**Owner: NYX Tannery Ltd**

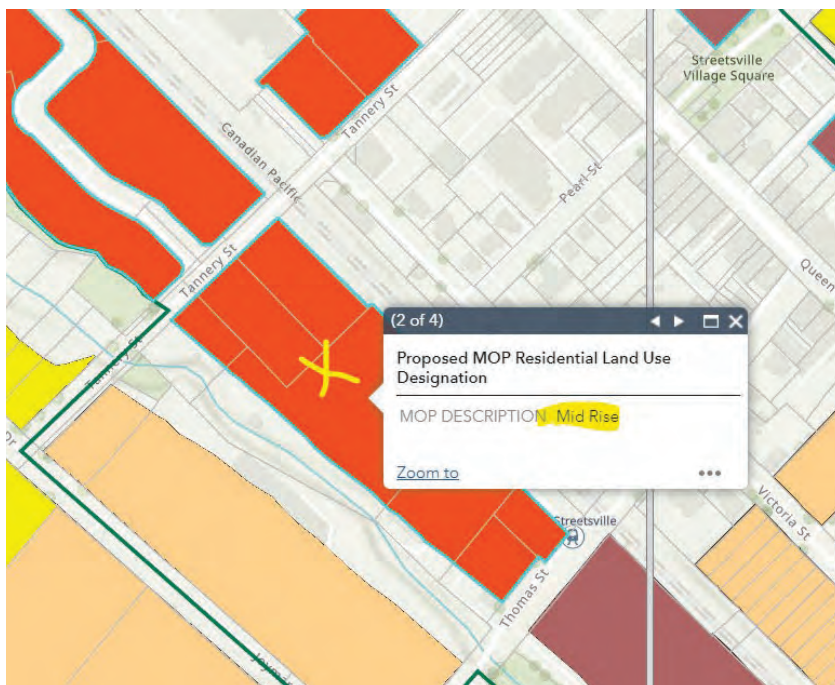
Glen Schnarr & Associates Inc. (GSAI) are planning consultants to NXY Tannery Ltd., registered owner of the properties located at 51 and 57 Tannery Street and 208 Emby Drive in Streetsville. We recognize that the Bundle # 3 policies are still of a preliminary nature, but appreciate the opportunity to review and comment on a new emerging policy frame work before a draft consolidated new Official Plan is released to the public. We appreciate any consideration you are able to provide at this early earlier stage in the process.

The consolidated parcels are identified with a yellow “X” on the land use mapping except from the 2010 Mississauga Official Plan. These properties are currently designated “Residential High Density” in the 2010 Mississauga Official Plan. These lands are within the Streetsville Community Node which is one of several designated “Transit Based Nodes” in Mississauga, the others being Port Credit, Cooksville and Dixie/Dundas. Community Nodes are areas designated to attract concentrations of mixed and higher density uses. The proposed Bundle # 3 Land Use Schedule and corresponding new Section 10.1.5.12 policies propose a new “Mid-Rise Residential” designation on these lands as depicted below. The proposed new Mid-Rise policies limit heights under the Mid-Rise designation to 8 storeys unless increased heights are permitted under Local Area Plan Character Area of Special Site Policies which allow heights to increase to a maximum of 12 storeys.

**2010 Mississauga Official Plan – High Density Residential**



**Bundle # 3 Proposed Revisions - Midrise Residential**





What is proposed is tantamount to a “down designation” of this site from a High-Rise designation to a Mid-Rise designation, seemingly without any justification considering the site is within a Transit Based Community Node. In addition, the subject lands are identified in the Regional Official Plan as a Planned MTSA given their proximity to walkable public transit, namely the Streetsville GO station which is within 800 m of the site. Section 5.6.19.15 of the Regional Official Plan states that it is the Region’s policy to ***“direct the local municipalities to establish policies in their Official Plans that identify Planned Major transit Station Areas and protect them for transit-supportive densities, uses, and active transportation connections.”*** As such, we would respectfully request that the Residential High Density designations be maintained on these sites. Our client has submitted a proposal for a 12-15 storey residential condominium development. The proposal has been before a DARC 1 meeting, and a formal complete submission is being undertaken at present for the DARC 2 process. Further, a Councillor hosted Community meeting has already been held.

We thank you for the opportunity to provide input into this major component of the forthcoming new consolidated Official Plan and trust that these comments will be taken into consideration. In the interim, please contact the undersigned via email or on cell # (905) 580-2854 if you have any questions or require any additional information. Thank you.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



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Jim Levac, MCIP, RPP  
Partner

Copy: Tim Jessop, NXY Capital Corp.



Partners: 6.5

**Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:***Glen Schnarr**

March 15, 2024

File: 1016-010

Via Email: [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)

Chairman and Members of the Mississauga  
Planning and Development Committee  
c/o Ms. Angie Melo, Legislative Co-ordinator  
City of Mississauga  
Clerks Department  
300 City Centre Drive  
Mississauga ON, L5B 3C1

To Whom It May Concern:

RE: Draft Mississauga Official Plan  
Statutory Public Meeting  
Comments OBO Morguard Corporation

Glen Schnarr and Associates Inc. (GSAI) act for Morguard Corporation who own multiple office, retail, employment and rental residential properties throughout the City of Mississauga. Our most recent submission on the ongoing Official Plan (OP) Review is dated July 26, 2023 and is attached to this submission. Morguard Corporation has a number of comments related to proposed new Official Plan policies as well as specific to several of their properties, many of which have been previously raised but remain unaddressed within the new draft OP. These are summarized as follows:

Proposed Midrise Designation: 2896 Battleford Road

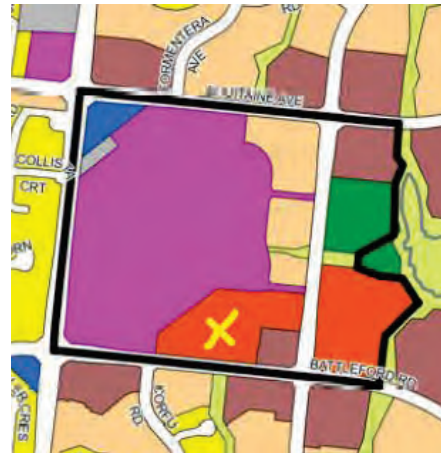
The subject lands are located at the northwest corner of Battleford Road and Glen Erin Drive and are currently designated “Residential High Density” as shown below. The subject lands are within the Meadowvale Town Centre Community Node. This site is currently occupied by older rental townhouses but given its locational attributes and location within a designated Community Node, the site is a potential candidate site for future high density residential uses. Under the current OP, Community Nodes are identified as areas within the City Structure where higher density

concentrations of Mixed Use and High Density development are expected to occur. It is further worth noting that the subject lands were included within the OPA 115 (Reimagining the Mall) boundary and initially subject to a maximum height limit of 15 storeys and maximum FSI limit of 2.25. Under the proposed new draft Mississauga OP, the designation of the subject lands (identified with a yellow “X”) is proposed to change from Residential High Density to Residential Mid-Rise.

Current 2010 OP



Draft New OP



The newly proposed Residential Mid-Rise designation on this site is tantamount to a down-designation and unacceptable to our client. This proposed designation permits maximum heights of 8 storeys or heights that do not exceed the width of the right-of-way (ROW) the site fronts onto. In this case the ROW is Battleford Road which has a designated ROW width of 26 m, which is roughly equivalent to 8 storeys. In our opinion, this proposed designation is inappropriate and the existing Residential High Density designation should be retained. This down designation is inconsistent and counter to other recent policy and development initiatives. For example, OPA 115, as per the recent Phase 2 settlement and resultant revised policies, permits maximum heights of 18 storeys on these lands which clearly conflicts with this new recommendation. Further, directly across the street from the Morguard lands on the south side of Battleford Road, Council approved a rezoning/OPA application, under file OZ 17/10 W9 (BCIMC Realty) to construct a second 12 storey building next to an existing 15 storey building. Unlike the Morguard lands, this particular building is outside of the Meadowvale Community Node and was approved at a height of 12 storeys. The site specific RA4-49 zoning further allowed a maximum height 47.0 m which vastly exceeds the designated ROW width of 26.0 m for Battleford Road. Clearly, it is obvious that

the policies governing heights of midrise and highrise buildings, both within and outside of Community Nodes, is not being applied consistently.

Downtown Core Sites: 33/55/77 and 201 City Centre Drive

Morguard Corporation own a number of key sites within the Downtown Core of Mississauga City Centre at 33/55/77 and 201 City Centre Drive, which are occupied by older office buildings constructed in the 1980s. Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. In the draft OP, the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. Proposed revisions have been made to the Downtown Core, Fairview, Cooksville and Hospital Urban Growth Centre Character Areas. Overall, these revisions appear to be consistent with those revisions arising from the City Council adopted Downtown Fairview, Cooksville and Hospital Policy Review in 2022, which culminated in the adoption of OPA 145 which is currently under appeal. Morguard are concerned with portions of the Urban Growth Centre policy framework and the draft land use framework as presented on Schedules 7, 8 and in Chapter 10. In particular, there is a discrepancy in the land use designation assigned to the above-noted sites. On Schedule 7, the Sites are not shown as being designated “Downtown Mixed Use”, however, on Schedule 8j, the sites are identified as being designated “Downtown Mixed Use”. We support the identification of the sites as being designated “Downtown Mixed Use”.

While the designations are supported, there are concerns with the Major Transit Station Area and Urban Growth Centre policy framework for designated Downtown Mixed Use lands. In particular, Policy 12.1.1.5 states redevelopment of lands which results in a significant reduction in the number of jobs that could be accommodated on the site will not be permitted (Policy 12.1.1.5) and that development must demonstrate how a concentration of jobs can be accommodated (Policy 12.1.1.6). In our opinion, these policies require revision to soften the requirement for job replacement or concentration. While the desire to have offices and other non-residential uses is understandable, the requirement for replacement of jobs or a concentration of jobs within a development is inconsistent with the development vision established by Provincial and Regional policy objectives for the Downtown Mississauga Urban Growth Centre to support the creation of a vibrant, compact, mixed-use, transit supportive, complete community and is not economically viable as evidenced by the City’s introduction of the Downtown Community Improvement Plan to try to attract development to the Downtown Core. Furthermore, the amount and density of non-residential uses is best addressed during the technical evaluation of a development application.

. We have a similar concern with the proposed Major Transit Station Area policy framework presented in Policy 11.3.2 which states that on designated Mixed Use, Mixed Use Limited and Downtown Mixed Use lands that a loss of existing non-residential area will not be permitted,



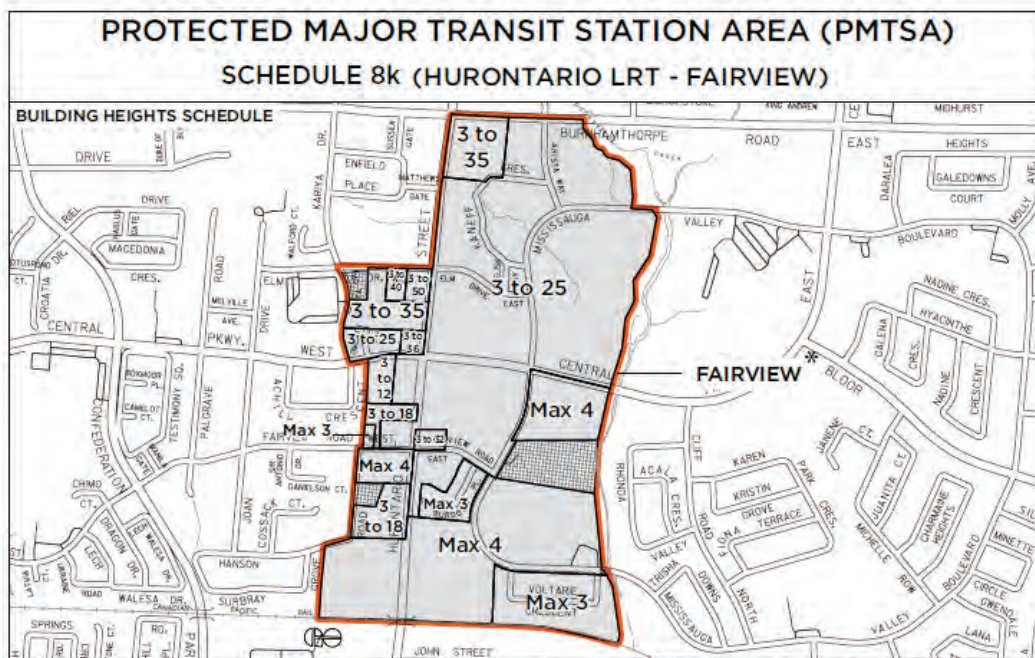
unless the planned function of the non-residential area is maintained. We highlight that while the lands are proposed to be re-designated to Downtown Mixed Use, the policy requirement for non-residential area to be retained is concerning. The above-noted policies require revision as they unnecessarily restrict the development potential of lands. It also does not adequately capture a developer's ability to right-size non-residential space based on market needs and tenant preferences. As evidence of this, the City of Mississauga themselves recently vacated several floors of office space at 201 City Centre to adopt a hybrid model allowing staff to work from home. Finally, the policy is contrary to the development vision for Urban Growth Centre lands as appropriate and desirable location for compact, mixed-use, pedestrian-oriented and transit supportive development forms to locate in order to support the Urban Growth Centre as a whole as a vibrant, attractive, complete, 15-minute community. The requirement for office floor space to be replaced will negatively impact the ability to deliver much needed mixed-use developments in the midst of a Provincial housing crisis and potentially sterilize sites from redeveloping under these types of conditions.

#### 1891 Rathburn Road East

Morguard Corporation own a 6.04 acre (2.44 ha) Neighbourhood shopping centre located at 1891 Rathburn Road East which is designated Mixed Use in the OP. The site is within a Neighbourhood area and falls outside of any Community Node or planned or protected MTSA. While redevelopment is not currently contemplated on these lands, the Mixed Use designation has always allowed for a more intensive form of mixed use with at grade commercial and higher density residential above grade. The new OP acknowledges that much of the future infill redevelopment the City will experience will involve Mixed Use sites in existing neighbourhoods. The proposed new Mixed Use policies found under Section 14.1.2 of the draft OP Neighbourhoods policies state that residential intensification within Neighbourhoods will generally occur through infilling. Of notable concern are policies under Section 14.1.2.2 which require development to provide one to one replacement of commercial floor space, impose a maximum midrise height of 8 storeys or not exceeding the ROW of the road they front onto, impose a maximum FSI of 1.75, require public vs private roads with specific block perimeters, and require centrally located public open space. In our view, these types of policies and height limitations will discourage redevelopment, and any types of prescriptive urban design policies should be guidelines and not policies which, depending on the characteristics and location of a site, cannot always be achieved. The policies also do not consider the existing built neighbourhood context, which includes two 18-storey apartment buildings located immediately adjacent to the shopping centre on the south side of Rathburn Road East.

### 1477/1547 Mississauga Valleys Boulevard

Morguard Corporation own a 3.3 acre vacant parcel fronting onto Central Parkway East, east of Mississauga Valley Boulevard. These lands are within the Downtown Fairview Protected MTSA which is also an Urban Growth Centre given its proximity to existing and proposed transit and amenities. Both the proposed new MTSA policies (OPA 141) and the new Downtown Fairview policies (OPA 145) are either awaiting Regional approval or subject to pending appeals. As earlier expressed, we are opposed to any new height limitations imposed within this or any MTSA. In this instance the proposed maximum height limitation is proposed to be 25 storeys. As a well buffered site within 800 m of the Hurontario LRT, additional height may be supported without having an unacceptable adverse impact. We believe that if the City so chooses to establish maximum height thresholds, then additional policies allowing minor increases should be entertained subject to certain criteria being met without the need for an Official Plan Amendment.



### General Proposed Official Plan Policies

We have reviewed the draft Mississauga Official Plan 2051 ('Draft OP'), released on February 12, 2024. Overall, the draft policies propose revisions to Chapters 5 (Housing Choices), 8 (Well Designed Healthy Communities), 11 (Transit Communities) and select Schedules, among others. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete,

draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns as outlined below.

***Chapter 5: Housing Choices and Affordable Homes***

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types will be problematic and will challenge the ability to deliver high-quality housing options for current and future residents that are compatible with each other. In our opinion, the policy should be revised to enable greater flexibility by encouraging phased developments to provide a range and mixture of housing units, rather than referencing housing type. It is also an accepted planning principle to allow one housing type in a phase of development provided that a variety of housing is provided in the overall development.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 Draft OP in May of 2023. Notwithstanding that the policy has been revised since the previous iteration, we remain concerned. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (no greater than 20%) of larger, family-sized units (understood as being two-bedroom units or larger) based on market realities without the need for

an Official Plan amendment. Otherwise, the requirement for 50% of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

*‘5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1’*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Furthermore, the requirement for affordable units, regardless of a property’s location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning and in our opinion, contrary to in-effect legislative and policy frameworks. We strongly recommend that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of the City’s Inclusionary Zoning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the specific City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing



units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. .

### ***Chapter 8: Well Designed Healthy Communities***

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires further consideration and modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique attributes and its context. There are many excellent examples in Mississauga and other municipalities where a building's height appropriately exceeds the right-of-way width. This is particularly the case in Mississauga's Downtown Character Area.

The policy also does not account for the diverging widths of streets across the City. For example, there is a diverse and variable network of laneways, local roads, arterial roads and highways. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and therefore, the width of the respective street onto which a building or structure fronts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. We also highlight that elsewhere in the draft OP, the provision of POPS is to be encouraged as one of many ways to provide sufficient landscaped and greenspaces for residents.

The above policy is contrary to the stated OP objective of encouraging POPS in appropriate locations. It will also challenge the delivery of vibrant, appropriately sized and located POPS across the City, particularly given the provision of POPS does not count for parkland dedication credit. Based on the above, we recommend that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy should be revised to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The 45 degree angular plane requirement should be removed from the above-noted policy. Also, as suggested by the word "guidelines", design guidelines are not intended to be policy but rather guide development based on the built context. As written, Policy 8.6.2.5 could be interpreted as requiring an Official Plan amendment if the design guidelines are not strictly adhered to, which is not appropriate.

#### *Section 8.6.1., Buildings and Building Types*

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the Draft OP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. We are concerned with the built form characterizations. The characterizations, as drafted, do not adequately capture the reality of development forms and do not provide for sufficient flexibility to accommodate a range and diversity of built forms at appropriate locations, that are compatible with the surrounding context. For the above-noted reasons, we request that the building characterizations be modified to recognize the existence and allow permission for these diverging built forms at appropriate locations across the City.

We trust that these comments and concerns will be considered and addressed as the new OP proceeds through further public consultation and appreciate the opportunity to provide comments..



Yours truly,

Jim Levac, MCIP, RPP  
Partner

Stephanie Matveeva, MCIP, RPP  
Associate

Copy: Brian Athey/Christine Cote/Mark Bradley, Morguard Corporation  
Ben Philips, Project Manager, Official Plan Review  
Councillor Kovac

*Via Email*

July 26, 2023

File: 1016-007

City of Mississauga  
Planning and Building Department  
City Planning Strategies Division  
300 City Centre Drive,  
Mississauga ON, L5B 3C1

Attn: Ms. Sharleen Bayovo, Project Lead  
Mississauga Official Plan Review

Re: **Mississauga Official Plan Review – Bundle # 3**  
**Comments on Proposed New Official Plan Policies**

Glen Schnarr & Associates Inc. (GSAI) are planning consultants to Morguard Corporation who own a number Employment, Mixed Use and Residential sites throughout the City of Mississauga. We recognize that the Bundle # 3 policies are still of a preliminary nature, but appreciate the opportunity to review and comment on a new emerging policy frame work before a draft consolidated new Official Plan is released to the public. We appreciate any consideration you are able to provide at this early earlier stage in the process. While Morguard Corporation own dozens of sites across the City, we are providing comments at this stage on a select few sites where we see potential issues that we feel should be brought to the City's attention in advance of a consolidated Draft Official Plan being released. Among those sites are the following:

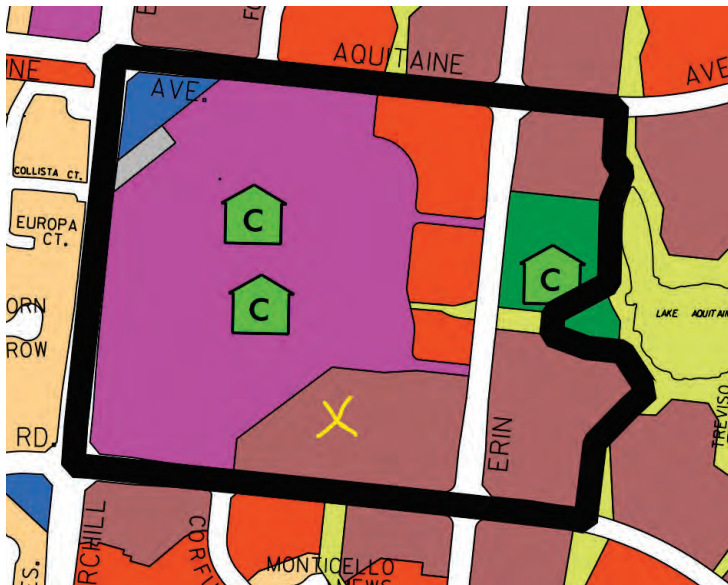
**2869 Battleford Road**

2869 Battleford Road is located at the northwest corner of Battleford Road and Glen Erin Drive. As depicted below, the subject lands (identified with a yellow "X") are currently designated "Residential High Density" in the 2010 Mississauga Official Plan. These lands are within the Meadowvale Community Node where they abut Meadowvale Town Centre. Community Nodes are areas designated to attract concentrations of mixed and higher density uses. The proposed Bundle # 3 Land Use Schedule and corresponding new Section 10.1.5.12 policies propose a new "Mid-Rise Residential" designation on these lands as depicted below. The proposed new Mid-Rise policies limit heights under the Mid-Rise designation to 8 storeys unless increased heights are permitted under Local Area Plan Character Area of Special Site Policies which allow heights to increase to a maximum of 12 storeys. What is proposed is tantamount to a "down

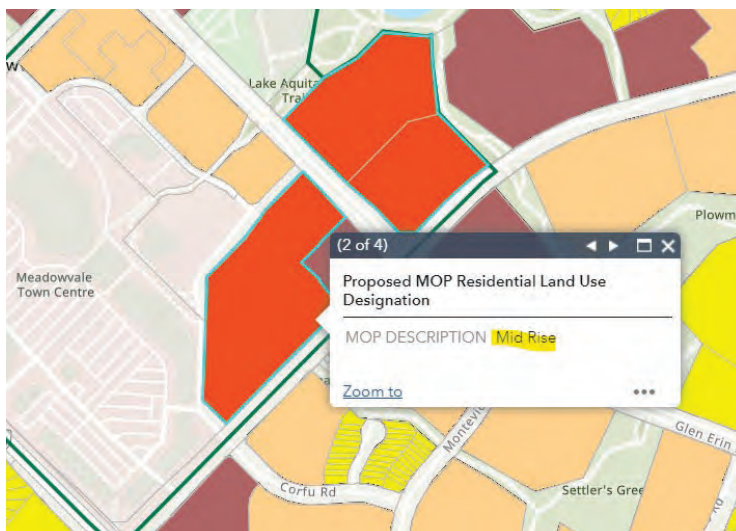


designation” of this site from a High-Rise designation to a Mid-Rise designation, seemingly without any justification considering the site is with a Mall Based Community Node. This further conflicts with the City’s recently enacted OPA 115 (Reimagining Mall) which is under appeal and pending the forthcoming Phase 2 hearing on height and density. OPA 115 acknowledges this as a high density designated site and proposes a maximum height of 15 storeys as a Mall Based Node. Therefore, as proposed, the Bundle 3 policies and designation conflict with OPA 115 that predates it. We would respectfully request that the Residential High Density designation be maintained on this site and that any future height or density limits or schedules be left blank until the Ontario Land Tribunal (OLT) has issued their Order on the pending Phase 2 hearing appeal.

### Current 2010 Official Plan: Residential High Density



### Proposed Bundle 3 Redesignation: Mid Rise Residential



**Downtown Core Sites: 33/55/77 and 201 City Centre Drive**

From our reading, there are no policy revisions within Bundle 3 to the current 12.1.3.5 policies that state, ***“Redevelopment of existing office buildings that results in the loss of office space will not be permitted unless the same amount of office space is retained or replaced through new development.”*** In the post pandemic world, we believe that 1-1 office replacement is not feasible and that this policy needs to be either repealed or updated, which doesn’t appear to be the case. We are not suggesting that no new office development should occur in Downtown Core, but based on recent experiences we have had with the Camrost redevelopment, a significantly small amount of office replacement may be warranted in response to what is expected to be a continued decline in office demand in the Downtown Core and elsewhere in Mississauga as working patterns continue to change. Has the City of Mississauga undertaken or commissioned any post-pandemic studies of this nature to assess future office demand?

Sections 12.2.5.1 – 12.2.5.5 (Urban Growth Centre) proposes a series of new parks and linear connections that could potentially impact the future redevelopment of 55 and 77 City Centre Drive that are on a prominent intersection of the City Centre in the Hurontario District. Further, Section 12.2.7.9 and Map 12-2-5 describe and delineate the Downtown Core Long Term Street Network and Classification which essentially change the alignment of City Centre Drive in this vicinity from circular road to a grid network with both the realignment and addition of new streets. In this regard, we would request that new language be inserted into the forthcoming consolidated Draft Official Plan that provides better flexibility for the future location of any future urban parkettes or new intersections or connecting roads based on either the receipt of new redevelopment plans/master plans or the City initiation of block or precinct plans.

**1477/1547 Mississauga Valley Boulevard**

Morguard Corporation own a 3.3 acre vacant parcel fronting onto Central Parkway East, east of Mississauga Valley Boulevard. These lands are within the Downtown Fairview Protected MTSA which is also an Urban Growth Centre given its proximity of existing transit and amenities. As both the proposed new MTSA policies (OPA 141) and the new Downtown Fairview (OPA 145) are subject to pending appeals, there should be no new height limitations imposed within this or any MTSA until these appeals have been addressed at the LRT.

**1891 Rathburn Road East**

The subject property contains a district sized shopping centre and remains designated “Mixed Use” under the new Bundle 3 policies. While these lands are not within a planned or protected MTSA or a designated Community Node, the retail landscape continues to change as we are seeing with many other district sized shopping centres (ie. Smart Centres on Dundas Street West, Queenscorp on Erin Mills Parkway) which have pivoted from purely retail to mixed use with retail and midrise redevelopment. We are pleased to see new Mixed Use policies promoting midrise built forms with some grade related retail within the same buildings. Will the City be imposing any height or density limits for these types of sites that are designated Mixed Use but fall outside of Community Nodes or MTSA’s?

**2920 Matheson Boulevard East & 4720-4880 Tahoe Boulevard**

The subject lands are within the Airport Office Node Employment Area (ONEA). Section 13.2.2.5 states, “*Lands within the Major Nodes that are designated Office will also permit post-secondary educational facilities*”. A “Post-Secondary Educational Facility” is not a defined term under Section 20: Glossary of the current 2010 Mississauga Official Plan, Mississauga Zoning Bylaw 225-2007 or within proposed Section 18: Glossary of the Bundle 3/proposed new Official Plan policies. While the term “post-secondary” generally implies adult level colleges or universities, we request that a new definition be created for the term “Post Secondary Educational Facilities” that also permits adult training centres, trade schools and career colleges as it is not uncommon to see these types of uses within office buildings.

We thank you for the opportunity to provide input into this major component of the forthcoming new consolidated Official Plan and trust that these comments will be taken into consideration. In the interim, please contact the undersigned via email or on cell # (905) 580-2854 if you have any questions or require any additional information. Thank you.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



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Jim Levac, MCIP, RPP  
Partner

Copy: Brian Athey/Christine Cote/Mark Bradley, Morguard Corporation

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 1484 – 003, 1484 – 004, 1484 – 005

(Via Email)

Chairman and Members of the Planning and Development Committee

c/o Angie Melo, PDC Coordinator

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE:       **Mississauga Official Plan 2051**  
              **Petruso Point Service Corp., Starmont Estates Inc.**  
              **3435 Eglinton Avenue West, 2555 Glen Erin Boulevard & 2980 Crosscurrent Drive, City of Mississauga**

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Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to Petruso Point Service Corp. and Starmont Estates Inc. (collectively, the 'Owners') of the lands municipally known as 3435 Eglinton Avenue West, 2555 Glen Erin Boulevard and 2980 Crosscurrent Drive, in the City of Mississauga. On behalf of the Owners, we are pleased to be providing this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

#### **Background Information:**

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

By way of context, the Owners have land holdings across the City of Mississauga. This Letter relates to three (3) parcels, each with their own context and locational characteristics. The existing context of each parcel is as follows:

#### ***3435 Eglinton Avenue West***

The Site, municipally known as 3435 Eglinton Avenue (hereinafter the '3435 Eglinton Lands') is located on the north side of Eglinton Avenue West, west of Tenth Line West. It is currently improved with a local retail plaza comprised of two (2), low-rise multi-tenant commercial structures and surface parking areas. Based on the in-effect planning policy framework, the 3435 Eglinton Lands is located within the Churchill Meadows Neighbourhood Character Area, is in proximity to the Winston Churchill 403 Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Convenience Commercial' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential.



When considered collectively, the in-effect policy framework identifies the 3435 Eglinton Lands as an appropriate and desirable location for higher density, compact development to occur. This is strengthened by the Site's locational characteristics of being within 300 metres of various street-level transit services, the Mississauga Transitway network and the planned 407 Transitway network. Additionally, the Site is located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Churchill Meadows as a vibrant, complete, 15-minute community.

#### *2555 Glen Erin Boulevard*

The Site, municipally known as 2555 Glen Erin Boulevard (hereinafter the '2555 Glen Erin Lands') is located on the north side of Erin Centre Boulevard, east of Erin Mills Parkway. It is currently improved with a local retail plaza comprised of a low-rise multi-tenant commercial structure and surface parking areas. Based on the in-effect planning policy framework, the 2555 Erin Centre Lands is located within the Central Erin Mills Neighbourhood Character Area, is immediately adjacent to the Central Erin Mills Major Node Character Area (in accordance with Schedule 9, Character Areas, Mississauga Official Plan), and is designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above and the surrounding context, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the 2555 Erin Centre Lands as an appropriate and desirable location for higher density, compact development to occur. This is strengthened by the Site's locational characteristics of being immediately adjacent to and within 300 metres of various street-level transit services, the Mississauga Transitway network and the Erin Mills Bus Terminal facility. Additionally, the Site is located within walking distance of various services, amenities, facilities, schools, parks and greenspaces to meet the daily needs of residents and support Central Erin Mills as a vibrant, complete, 15-minute community.

#### *2980 Crosscurrent Drive*

The Site, municipally known as 2980 Crosscurrent Drive (hereinafter the '2980 Crosscurrent Lands') is located on the east side of Winston Churchill Boulevard, south of Crosscurrent Drive. It is currently improved with a local retail plaza comprised of a low-rise multi-tenant commercial structure and surface parking areas. Based on the in-effect planning policy framework, the 2980 Crosscurrent Lands is located within the Meadowvale Neighbourhood Character Area and is designated 'Convenience Commercial' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above and the surrounding context, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the 2980 Crosscurrent Lands as an appropriate and desirable location for higher density, compact development to occur. This is strengthened by the Site's locational characteristics of being within 300 metres of various street-level transit services. Additionally, the Site is located within walking distance of various services, amenities, parks and greenspaces to meet the daily needs of residents and support Meadowvale as a vibrant, complete, 15-minute community.

### Concerns Related to the Draft Mississauga Official Plan 2051:

We have reviewed the draft Mississauga Official Plan 2051 ('Draft OP'), released on February 12, 2024. The draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 14 (Neighbourhoods) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns as outlined below.

#### *Chapter 3: Directing New Development*

The Draft OP continues to provide guiding policy direction for how growth and development is to be managed in accordance with a City Structure. The proposed City Structure, as presented on Schedule 1, remains largely unchanged from the in-effect Mississauga Official Plan. In the case of the 3435 Eglinton Lands, 2555 Glen Erin Lands and 2980 Crosscurrent Lands, the proposed City Structure continues to identify the sites as being located within the Neighbourhood component of the City Structure. While we support the continued use of a policy framework, structured by the City Structure, the continued inclusion of the above-noted lands within the Neighbourhoods component may further challenge the delivery of refined, optimized, redevelopment forms in appropriate locations.

#### *Chapter 5: Housing Choices and Affordable Homes*

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types will be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to enable greater flexibility by encouraging phased developments to provide a range and mixture of housing units, rather than referencing housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- social housing or other publicly funded housing; or*
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people*

*with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 Draft OP in May of 2023. Notwithstanding that the policy has been revised since the previous iteration, we remain concerned. In our opinion, the above-noted policy should be revised and any reference to specific percentage of larger dwelling units should be removed. As written, the requirement for any number of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis. Instead, the policy should be revised to encourage a range of housing units to be provided so that the changing needs of residents can be met.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning and should be removed. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning and contrary to the powers of the City. Furthermore, the above-noted housing-related targets have not been adapted nor studied to ensure applicability at the specific City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure have been deemed illegal by Ontario Land Tribunal decisions and will challenge the rapid delivery of housing units, in appropriate locations. Policy 5.2.5 and Table 5.1 must be removed.

*Chapter 8: Well Designed Healthy Communities*

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires further consideration and modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique attributes and its context. The policy also does not account for the diverging widths of streets across the City. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street, greater flexibility to permit buildings of appropriate scales and heights is paramount.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. Based on the above, we recommend that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance. .

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy should must be revised to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The 45 degree angular plane requirement will challenge development for the following reasons:

- application of an angular plane eliminates a significant percentage (up to 50%) of available gross floor area or

dwelling units while we are in the midst of a housing crisis;

- application of an angular plane significantly increases the cost of construction, thereby reducing project feasibility;
- application of an angular plane negatively and adversely impacts building sustainability/energy efficiency due to heat loss arising from stepping and or terracing; and,
- application of an angular plane is contrary to good planning and design practices found in other jurisdictions.

For the above noted reasons, the angular plane requirement of Policy 8.6.2.5 must be removed.

### ***Buildings and Building Types***

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the Draft OP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. Of relevance to the 3435 Eglinton Lands, 2555 Glen Erin Lands and 2980 Crosscurrent Lands, the Draft OP framework presents characterizations of mid-rise and high-rise built forms. These built forms are characterized as follows:

- 'b. Mid-rise buildings: in Mississauga, mid-rise buildings are generally higher than four storeys with maximum heights as prescribed by area-specific policies and land use designations. Their height should not exceed the width of the right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings can accommodate many uses and provide transit-supportive densities yet are moderate in scale, have good street proportion, allow for access to sunlight, have open views to the sky from the street, and support high-quality, accessible open spaces in the block. Mid-rise buildings provide good transition in scale to adjacent low-rise built forms.*
- c. High-rise buildings: they represent buildings with height maximums as prescribed by local area policies and land use designations. High-rise buildings, which can also be referred to as Tall Buildings in this Plan, provide transit-supportive densities and play an important role in allowing the city to meet its growth targets, especially within Strategic Growth Areas.'*

The above mid-rise and high-rise building characterizations are problematic. Specifically, the 3435 Eglinton Lands, 2555 Glen Erin Lands and 2980 Crosscurrent Lands are not subject to a Local Area Plan. Instead, the sites collectively are subject to Neighbourhood Character Area policies and the applicable land use policies. The above characterizations do not adequately capture the reality of development forms and do not provide for sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of Local Plan Area boundaries. We are also concerned with the characterization of mid-rise buildings as having a permitted height range and requiring that this built form have a relationship to the width of a street upon which it fronts. For the above-noted reasons, we oppose the mid-rise and high-rise building characterizations. These characterizations must be modified to recognize the existence and allow permission for these built forms at appropriate locations across the City.



### *Chapter 10: Land Use Designations*

The Draft OP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the Draft OP Schedule 7, Land Use Designations, a number of properties across the City have been re-designated or permissions otherwise modified. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions available in existing permissions. This is unacceptable and should not be carried forward.

In the case of the Subject Lands, the proposed land use designations (Schedule 7) are concerning. Specifically, Schedule 7 maintains the current 'Convenience Commercial' designations on the 3435 Eglinton Lands and the 2980 Crosscurrent Lands. Schedule 7 also maintains the 'Mixed Use' designation on the 2555 Glen Erin Lands.

Maintenance of the 'Mixed Use' designation on the 2555 Glen Erin Lands is concerning. Section 10.2.6 of the Draft OP contains the parent Mixed Use policy framework which any development application must be evaluated.. We are concerned with Policies 10.2.6.2 and 10.2.6.3 as stated below.

*'10.2.6.2. The planned function of lands designated Mixed Use is to provide a variety of retail, service and other uses to support the surrounding residents and businesses. Development on Mixed Use sites that includes residential uses will be required to contain a mixture of permitted uses. This mix of uses is required in order to create complete communities with destinations that are close enough for walking and cycling to be the most attractive transportation option. In addition to mitigating traffic congestion, this enhances human health and reduces greenhouse gas emissions.'*

*'10.2.6.3. Redevelopment of Mixed Use sites must maintain the same amount of non-residential floor space.'*

The above-noted policies require revision. Collectively, the above-noted policies are unnecessarily restrictive and may challenge the ability for lands to be appropriately redeveloped. Specifically, that a range of retail, service and other uses be provided can be a challenge for development proponents to accommodate and may challenge a proponent's ability to offer a sufficient and efficient non-residential floor area. Similarly, the policy requirement that existing non-residential floor area be replaced does not adequately accommodate the evolving context of communities and market trends. Furthermore, the policies noted above may hinder the development potential of designated Mixed Use lands and the lands' ability to support contextually appropriate development that is able to further implement Provincial, Regional and local policy objectives for compact, mixed-use, complete communities. Lastly, the above-noted policies do not satisfactorily reflect changing market trends nor does it enable a proponent to provide an appropriate amount of non-residential. Greater flexibility is needed to enable vibrant, compact, efficient redevelopment forms to be implemented in appropriate locations.

### **Chapter 14: Neighbourhoods**

Revisions are contemplated in Chapter 14 for lands located within the Neighbourhood component of the City Structure. In the case of the 3435 Eglinton Lands, 2555 Glen Erin Lands and 2980 Crosscurrent Lands, these sites are located within the Churchill Meadows, Central Erin Mills and Meadowvale Neighbourhood Character Areas, respectively. As such, each site it is subject to the parent Neighbourhood Character Area policies presented in Section 14.1.1, General, and the

Character Area-specific policies. We highlight that the Neighbourhood Character Area policies for the Central Erin Mills and Churchill Meadows communities are absent from the Draft OP. This absence is concerning and prevents an evaluation of the Draft OP in its totality.

When considered collectively, the refined Neighbourhood policy framework and in particular Policies 14.1.1.6 and 14.1.2.2 as stated below are problematic.

*'14.1.1.6. Intensification within Neighbourhoods may be considered where the proposed development is compatible in built form and scale to surrounding development, enhances the existing or planned development and is consistent with the policies of this Plan.'*

*'14.1.2.2. Within Neighbourhood Character Areas, development of Mixed Use sites that are over 1 ha in size will:*

- a. maintain the same amount of commercial floor space;*
- b. ensure a significant range of retail and service commercial uses that meet the needs of the local population is provided;*
- c. include a mix of low and mid-rise buildings with maximum heights not exceeding the width of the street right-of-way that they front onto, up to a maximum of 8 storeys;*
- d. have a maximum floor space index (FSI) of 1.75 to guide the form, massing and density of proposed buildings;*
- e. provide a well-connected road system, including the addition of public roads to encourage walking, cycling and support public transit;*
- f. ensure roads surrounding blocks are public and meet City of right-of-way and design standards;*
- g. provide public open space that is designed and located to create a central focus, in accordance with the policies of this Plan and the City's Park Plan;*
- h. provide for appropriate massing and transition to surrounding context;*
- i. ensure newly created blocks maximize connectivity, pedestrian walkability, vehicular access, servicing routes and internal permeability. Block perimeters will generally not exceed 520 m;*
- j. include a variety of unit sizes and tenures to accommodate a range of households;*
- k. explore opportunities for energy conservation through design and the use of renewable energy sources; and*
- l. adhere to urban form and design policies of this Plan and the City's Green Design Guidelines.'*

Firstly, we are opposed to policy requirements for non-residential replacement. The policy requirement to replace existing non-residential floor space in a development is overly restrictive and will challenge an ability for proponents to provide a sufficient amount of non-residential space that is capable of accommodating the evolving contexts of communities and market trends. In addition to this concern, the above-noted policies when considered collectively are overly restrictive and require revisions. We oppose the maximum building height of 8 storeys identified and request that this height limitation be removed. Furthermore, the statement that intensification within Neighbourhoods may be considered is contrary to the policy objectives identified throughout the Draft OP. While certain Neighbourhood Character Area lands are not suitable for higher density, compact, mixed-use development, the 3435 Eglinton Lands, 2555 Glen Erin Lands and 2980 Crosscurrent Lands are an appropriate and desirable locations for this type of development to occur. The statement that intensification may be considered will challenge the development potential

of lands. Similarly, the policy requirements that a significant, without clarity on how significant is to be understood, range of retail and service commercial uses be provided, that a range and mixture of specified building types be provided and that public open spaces be provided amongst other matters are unnecessarily restrictive. These policy provisions should be removed and instead, sufficiently flexible evaluation criteria should be provided to enable contextually appropriate, compatible intensification developments to occur in appropriate locations.

#### *Meadowvale Neighbourhood Character Area*

As mentioned above, the 2980 Crosscurrent Lands are located within and are subject to the Meadowvale Neighbourhood Character Area policies. The Draft OP presents refinements to Chapter 14.10, Meadowvale that are concerning. Of relevance to the 2980 Crosscurrent Lands, Policies 14.10.2.2, 14.10.2.5, 14.10.2.6 as stated below are of particular concern:

*'14.10.2.2. Notwithstanding the policies of this Plan, building heights of up to 12 storeys may be permitted on lands designated Mixed Use and Residential High Rise subject to the following requirement:*

*a. new and existing buildings do not exceed a maximum floor space index (FSI) of 2.0.'*

*'14.10.2.5. The built form in Meadowvale will preserve an open and green character by:*

*c. ensuring new buildings above four storeys relate to their surrounding context and achieve an appropriate transition in height generally consistent with a 45 degree angular plane to adjacent low-rise residential areas.'*

*'14.10.2.6. Taller buildings between nine and 12 storeys will be required to incorporate podiums that are a minimum of three storeys and a maximum of six storeys. For the purposes of these policies, podium means the base of a building that is distinguished from the taller portion of the building by being set forward or articulated architecturally.'*

The above-noted policies require revision for a number of reasons. Firstly, the policy requirement that building heights for Residential High-Rise lands be limited to 12 storeys is inconsistent with the policy objectives stated elsewhere in the Draft OP. Furthermore, the policy limitation that new and existing buildings not exceed a maximum FSI of 2.0 is concerning. This policy also does not provide sufficient guidance on how the limitation of density is to be applied. For example, as written, Policy 14.10.2.2.a would suggest that the maximum density applies to all lands within an area and not on a site-specific basis. Refinement is required to clarify what scale the maximum density limitation applies to. We also request that the maximum density be increased to enable built forms that are sufficiently dense to support compact, pedestrian-oriented and transit-supportive development forms.

As stated above in this Letter, we are opposed to the application of angular planes. Given the application of angular planes is one of many policy tools available, the policy requirement that an angular plane, without specifying how an angular plane is to be applied, must be removed.

Finally, we are concerned with Policy 14.10.2.6 as written. A policy requirement that mid-rise built forms be designed in such a manner to incorporate a podium is overly restrictive, contrary to good planning and design practices and will challenge the development potential of lands. The application of a podium and tower configuration for lower rise built

forms, when compared to high-rise or tall buildings, does not adequately reflect development realities. This policy should be removed to enable contextually appropriate development forms to be introduced at appropriate locations across the Meadowvale community.

**Conclusion:**

In summary, we are concerned about the proposed policy directions outlined in the Draft OP and request that modifications as identified throughout this letter be made. Thank you for the opportunity to provide these comments. Our Client, the Owners, wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Jim Levac, MCIP, RPP  
Partner

Stephanie Matveeva, MCIP, RPP  
Associate

cc. Owners  
Councillor McFadden  
Councillor Butt  
Councillor Reid  
Ben Phillips, Project Manager, Official Plan Review

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 1415 – 002

(Via Email)

Chairman and Members of the Planning and Development Committee

c/o Angie Melo

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
 Stephen-Mitchell Realty Limited, Whitehorn Investments Limited and Lynrob Investments Limited  
 1225 Dundas Street East, City of Mississauga

Glen Schnarr and Associates Inc., ('GSAI') are the planning consultants to Stephen-Mitchell Realty Limited, Whitehorn Investments Limited and Lynrob Investments Limited (the 'Owners') of the lands municipally known as 1225 Dundas Street East, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owners and specifically with reference to the Site, we are providing this Comment Letter that outlines the Owners' concerns in relation to the ongoing Mississauga Official Plan Review initiative.

### Background Information:

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the north side of Dundas Street East, west of Queen Frederica Drive. The Site is currently improved with a local retail plaza comprised of a multi-tenant commercial structure and surface parking areas. Based on the in-effect planning policy framework, the Site is located within the Applewood Neighbourhood Character Area, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the Dixie GO Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential. This is further supported by the Site's inclusion within the Dundas Connects Master Plan.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, mixed-use, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being directly in front of the planned Dundas Bus Rapid Transit ('BRT') network and being within 300 metres of various street-level transit services and the Dixie GO Station. Additionally, the Subject Lands



are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Applewood as a vibrant, complete, 15-minute community.

In addition, it is important to note that the Subject Lands are subject to an active Official Plan Amendment ('OPA'), Zoning By-law Amendment ('ZBA') and Site Plan Approval Applications ('SPA') (City File Nos. OZ/OPA 22-20 W3, SP-22-131) (hereinafter referred to as the 'Applications'). Collectively, these active Applications seek to introduce a vibrant, compact, mixed-use development on the Subject Lands comprised of a 12-storey, mixed-use structure with frontage along Dundas Street East and three (3) blocks of 3-storey townhouse dwellings along the northern property line. The proposed development has been planned and designed to implement contextually appropriate development and further implement the development vision for compact, mixed-use development along the Dundas Street corridor as outlined in the City's Dundas Connects Master Plan.

#### **Concerns Related to the Draft Mississauga Official Plan 2051:**

We have reviewed the draft Mississauga Official Plan 2051 ('Draft OP'), released on February 12, 2024. The draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 14 (Neighbourhoods) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns as outlined below.

##### **1. Chapter 3: Directing New Development**

The Draft OP continues to provide guiding policy direction for how growth and development is to be managed in accordance with a City Structure. The proposed City Structure, as presented on Schedule 1, remains largely unchanged from the in-effect Mississauga Official Plan. In the case of the Subject Lands, the proposed City Structure continues to identify the Site as being located within the Neighbourhood component of the City Structure.

The Draft OP also introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area given the Site is located within the Dixie GO MTSA. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities as well as implement Provincial and Regional policy objectives. To continue to identify the Site as being located within the Neighbourhood component of the City Structure ignores the significant and important attributes of the Site appropriate for intensification.

Inclusion of the Subject Lands within the Applewood Neighbourhood Character Area also ignores the Owners' request that the boundary of the Dundas-Dixie Community Node be refined as outlined in the active Applications and in correspondence filed regarding Mississauga Official Plan Amendment 141. Given the above, we request that the Draft

OP be amended to reflect a modified Dundas-Dixie Community Node boundary. Inclusion of the Subject Lands within the refined Dundas-Dixie Community Node boundary will further support compact, mixed-use development to occur in appropriate locations and will further support the policy directions for Strategic Growth Area given Community Node lands are recognized as Strategic Growth Areas.

## 2. Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types will be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to enable greater flexibility by encouraging phased developments to provide a range and mixture of housing units, rather than referencing housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- social housing or other publicly funded housing; or*
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 Draft OP in May of 2023. Notwithstanding that the policy has been revised since the previous iteration, we remain concerned. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (no greater than 20%) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the specific City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning and in our opinion, contrary to in-effect legislative and policy frameworks. We strongly recommend that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of the City's Inclusionary Zoning.

### **3. Chapter 8: Well Designed Healthy Communities**

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires further consideration and modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique attributes and its contexts. The policy also does not account for the diverging widths of streets across the City. For example, there is a diverse and variable network of laneways, local roads, arterial roads and highways. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and therefore, the width of the respective street onto which a building or structure fronts. Furthermore, a limitation of

building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. Based on the above, we recommend that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance. .

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy should be revised to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The 45 degree angular plane requirement should be removed from the above-noted policy.

#### *Section 8.6.1., Buildings and Building Types*

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the Draft OP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. Of relevance to the Subject Lands, the Draft OP framework would characterize the proposed built form as presented in the active development application as a high-rise built form and low-rise built forms. For clarity, these built forms are characterized as follows:

*'a. Low-rise buildings: they include a variety of grade-related housing types that range from detached and semi-detached dwellings to slightly denser forms such as townhouses and multiplexes. Low-rise buildings can also house non-residential uses such as commercial, institutional or other employment uses. They assist in providing a mix of built forms that support streets, parks and open spaces, at a lower scale – no taller than four storeys in height – and can be designed to integrate architecturally to complement the surrounding context and provide transition to existing streetscapes.'*

- c. *High-rise buildings: they represent buildings with height maximums as prescribed by local area policies and land use designations. High-rise buildings, which can also be referred to as Tall Buildings in this Plan, provide transit-supportive densities and play an important role in allowing the city to meet its growth targets, especially within Strategic Growth Areas.'*

The above high-rise building characterization is concerning. Specifically, the Subject Lands are not subject to a Local Area Plan. Instead, the Subject Lands are subject to the Applewood Neighbourhood Character Area policies and the applicable Mixed Use policies. The above characterization does not adequately capture the reality and does not provide for sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of Local Plan Area boundaries. We request that the high-rise building characterization be modified to recognize the existence and allow permission for tall buildings at appropriate locations across the City.

#### **4. Chapter 10: Land Use Designations**

The Draft OP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the Draft OP Schedule 7, Land Use Designations, a number of properties across the City have been re-designated or permissions otherwise modified. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions available in existing permissions. This is unacceptable and should not be carried forward.

In the case of the Subject Lands, the proposed land use designation (Schedule 7) is concerning. Specifically, while Schedule 7 maintains the Subject Lands as being designated 'Mixed Use', a new Natural Hazard overlay has been applied on the southern property line. Given the Site's locational attributes and in particular it's distance from any natural area or hazard area, it is our opinion that the Natural Hazard overlay is inappropriate and unnecessarily restrictive. It will also challenge an ability to implement contextually appropriate development as established by other local policy directions. Given the above, we recommend that the Natural Hazard overlay be removed.

Maintenance of the 'Mixed Use' designation is also concerning. Section 10.2.6 of the Draft OP contains the parent Mixed Use policy framework which any development application must be evaluated.. We are concerned with Policies 10.2.6.2 and 10.2.6.3 as stated below.

*'10.2.6.2. The planned function of lands designated Mixed Use is to provide a variety of retail, service and other uses to support the surrounding residents and businesses. Development on Mixed Use sites that includes residential uses will be required to contain a mixture of permitted uses. This mix of uses is required in order to create complete communities with destinations that are close enough for walking and cycling to be the most attractive transportation option. In addition to mitigating traffic congestion, this enhances human health and reduces greenhouse gas emissions.'*

*'10.2.6.3. Redevelopment of Mixed Use sites must maintain the same amount of non-residential floor space.'*

The above-noted policies are concerning and require revision. Collectively, the above-noted policies are unnecessarily restrictive and may challenge the ability for lands to be appropriately redeveloped. Specifically, that a range of retail, service and other uses be provided can be a challenge for development proponents to accommodate and may



challenge a proponent's ability to offer a sufficient and efficient non-residential floor area. Similarly, the policy requirement that existing non-residential floor area be replaced does not adequately accommodate the evolving context of communities and market trends. Furthermore, the policies noted above may hinder the development potential of designated Mixed Use lands and the lands' ability to support contextually appropriate development that is able to further implement Provincial, Regional and local policy objectives for compact, mixed-use, complete communities. Lastly, the above-noted policies do not satisfactorily reflect changing market trends nor does it enable a proponent to provide an appropriate amount of non-residential. Greater flexibility is needed to enable vibrant, compact, efficient redevelopment forms to be implemented in appropriate locations.

#### **5. Chapter 11: Transit Communities**

The Draft OP proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144 as well as by the Council approved Downtown Fairview, Cooksville and Hospital Policy Review and the Dundas Corridor Policy Implementation initiatives. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8g, the Subject Lands are identified as being located within the Dixie GO Protected Major Transit Station Area (PMTSA), are designated 'Mixed Use' and are awarded height permissions of 3 to 9 storeys. This height permission is inappropriate, insufficient and will challenge the ability to implement vibrant, efficient, transit-supportive development in an appropriate location where higher density, compact, mixed-use, transit-supportive development should be directed. Furthermore, the proposed building height maximum will be a barrier to supporting efficient, high-quality development from occurring and will be a barrier to supporting greater housing choice, while we are in the midst of a Provincial housing crisis. In light of the above, we recommend that the City's MTSA policy framework be modified to identify the evaluation criteria that must be satisfied in order for additional height above and beyond the maximum permitted height range identified by Schedule 8 to be evaluated.

In addition to the concerns identified above, we remain concerned with aspects of the MTSA policy framework. Specifically, the MTSA policy framework contains guidance for Mixed Use designated lands, such as the Subject Lands. As such, Section 11.3, Land Uses applies to any development of the Subject Lands. Given this, we are concerned with Policies 11.3.2, 11.3.3 and 11.3.4 as stated below:

*'11.3.2. Redevelopment of Mixed Use, Mixed Use Limited and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment.'*

*'11.3.3. Maintaining the non-residential planned functions means providing:*

*a. a concentration of convenient, easily accessible office, retail and service commercial uses that meet*

- the needs of local residents and employees; and*
- b. employment opportunities, such as office, recreation and institutional jobs.'*

*'11.3.4.. Development will contribute towards the creation of transit-supportive communities by:*

- a. including a broad and balanced mix of land uses, with a range of residential and non-residential uses;*
- b. providing housing choices to facilitate affordable housing options with a mix of tenure, affordable rental and ownership options for lower and middle income households;*
- c. including a range of employment uses to achieve a well balanced mix of office and retail uses; ....'*

The above-noted policies are concerning. As stated above, we are concerned with the policy requirements for replacement of non-residential area. In our opinion, the above-noted policies require modification to state that the provision of a variety of non-residential uses should be encouraged in a new development, rather than requiring non-residential area replacement. The above-noted policies are also overly restrictive and do not provide sufficient flexibility to accommodate evolving community contexts nor market trends. The requirement to demonstrate how a development contributes to a concentration of jobs may prevent the development potential of lands from being realized. In our opinion, the policies require modification to clearly identify how a concentration of jobs is to be defined and to provide greater flexibility for mixed-use developments to accommodate an appropriate, right-sized amount of non-residential uses.

## **6. Chapter 14: Neighbourhoods**

Revisions are contemplated in Chapter 14 for lands located within the Neighbourhood component of the City Structure. In the case of the Subject Lands, the Site is located within the Applewood Neighbourhood Character Area. As such, it is subject to the parent Neighbourhood Character Area policies presented in Section 14.1.1, General, Section 14.1.2, Mixed Use and Section 14.2, Applewood.

When considered collectively, we are concerned with the refined Neighbourhood policy framework and in particular Policies 14.1.1.6 and 14.1.2.2 as stated below.

*'14.1.1.6. Intensification within Neighbourhoods may be considered where the proposed development is compatible in built form and scale to surrounding development, enhances the existing or planned development and is consistent with the policies of this Plan.'*

*'14.1.2.2. Within Neighbourhood Character Areas, development of Mixed Use sites that are over 1 ha in size will:*

- a. maintain the same amount of commercial floor space;*
- b. ensure a significant range of retail and service commercial uses that meet the needs of the local population is provided;*
- c. include a mix of low and mid-rise buildings with maximum heights not exceeding the width of the street right-of-way that they front onto, up to a maximum of 8 storeys;*

- d. have a maximum floor space index (FSI) of 1.75 to guide the form, massing and density of proposed buildings;*
- e. provide a well-connected road system, including the addition of public roads to encourage walking, cycling and support public transit;*
- f. ensure roads surrounding blocks are public and meet City of right-of-way and design standards;*
- g. provide public open space that is designed and located to create a central focus, in accordance with the policies of this Plan and the City's Park Plan;*
- h. provide for appropriate massing and transition to surrounding context;*
- i. ensure newly created blocks maximize connectivity, pedestrian walkability, vehicular access, servicing routes and internal permeability. Block perimeters will generally not exceed 520 m;*
- j. include a variety of unit sizes and tenures to accommodate a range of households;*
- k. explore opportunities for energy conservation through design and the use of renewable energy sources; and*
- l. adhere to urban form and design policies of this Plan and the City's Green Design Guidelines.'*

As previously stated, we continued to be concerned with policy requirements for non-residential replacement. In addition to this concern, the above-noted policies when considered collectively are overly restrictive and require revisions. The statement that intensification within Neighbourhoods may be considered is contrary to the policy objectives identified throughout the Draft OP. While certain Neighbourhood Character Area lands are not suitable for higher density, compact, mixed-use development, the Subject Lands are an appropriate and desirable location for this type of development to occur. The statement that intensification may be considered will challenge the development potential of lands. Similarly, the policy requirements that a significant, without clarity on how significant is to be understood, range of retail and service commercial uses be provided, that a range and mixture of specified building types be provided and that public open spaces be provided amongst other matters are unnecessarily restrictive. These policy provisions should be removed and instead, sufficiently flexible evaluation criteria should be provided to enable contextually appropriate, compatible intensification developments to occur in appropriate locations.

#### **Additional Lands**

We highlight that the Owners are property Owners of various properties across the City of Mississauga, including the lands municipally known as 1500 Dundas Street East, 1575 Dundas Street East and 2555 Dixie Road. Collectively, the above-noted lands are located along the Dundas Street East corridor and are impacted by the Draft OP. The concerns outlined above, particularly in relation to Chapters 5, 8, 10 and 11 are also equally valid, in relation to these additional lands. We request that the necessary modifications as recommended in this letter be made in relation to all of the Owners lands.

#### **Conclusion:**

In summary, we are concerned about the proposed policy directions outlined in the Draft OP and request that modifications as identified throughout this letter be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in all further engagement related to the OP Review Initiative and wishes to be



informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

Jim Levac, MCIP, RPP  
Partner

Stephanie Matveeva, MCIP, RPP  
Associate

cc.      Owner  
         Councillor Fonseca  
         Ben Phillips, Project Manager, Official Plan Review  
         Mary Flynn-Guglietti, McMillan LLP



March 15, 2024

**By E-Mail to *deputations.presentations@mississauga.ca***

Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga ON L5B 3C11

**Attention: Angie Melo, Legislative Coordinator; Amina Menkad, Project Lead; Ben Phillips, Project Manager**

Dear Sirs/Mesdames:

**Re: Proposed Mississauga Official Plan 2051**

Dream Asset Management is the agent for related corporations who are owners of various lands within the City of Mississauga, including 70 Park Street East (MPCT DIF DREAM 70 Park Street East LP) (collectively referred to herein as “Dream”) located in the Port Credit PMTSA.

We are writing with respect to the proposed Mississauga Official Plan 2051 (“MOP 2051”) released in February 2024. We understand the proposed MOP 2051 is available for review and comment, and that a statutory public meeting is scheduled for March 18, 2024, at the Planning and Development Committee (“PDC”) meeting. We hereby provide a written submission to PDC for consideration and this letter reiterates comments we have previously provided.

We attended the Statutory Public Open House that occurred virtually on February 27, 2024, and have reviewed the staff report CD.02-MIS that will be received for information at the March 18, 2024, PDC meeting. We are also reviewing MOP 2051 and have provided comments below based on our review to date that largely relate to the proposed PMTSA policies within the proposed MOP 2051.

Dream generally supports the steps taken by the Region of Peel and the City of Mississauga in developing a policy framework for PMTSAs. Planning for PMTSAs is a critical tool for municipalities to accommodate population and economic growth, promote social change and further sustainability goals by supporting transit-oriented communities. Provincial policy directs land use patterns within these areas to have a density and mix of land uses that efficiently use land, are appropriate for planned or available infrastructure, support active transportation, and are transit supportive. Likewise, policies within the Region of Peel and City of Mississauga Official Plans promote intensification, appropriate density, and a range and mix of uses around transit to encourage the development of complete communities.

Dream’s purpose-driven approach to real estate investment is well aligned with the objectives of the proposed PMTSA policy. Dream is committed to supporting community health and well-being while reducing socioeconomic inequalities and seeking creative and sustainable methods to make our communities more integrated and collaborative. Our goals as a company align with those of the Province, Region, and City in promoting economic, social, and environmental sustainability by creating



transit-oriented and walkable communities with a strong emphasis on social and environmental improvements.

We note below the following proposed policies within the proposed MOP 2051:

- Lands within a PMTSA are subject to density, height and land use policies and schedules related to the applicable PMTSA. We would like to acknowledge our appreciation for the City's consideration of cases where a conflict between these policies and other policies and schedules within MOP 2051, PMTSA policies and schedules will take precedence, where applicable (10.1).
- Minimum and maximum height permissions have been moved from the City Structure policies to dedicated Urban Growth Centre and Nodes chapters. Overall height ranges for City Structure elements remain generally unchanged; however, additional Chapters provide policies with alternative or updated height permissions. Instead, the City Structure policies outline the planned built form per City Structure element, including whether buildings are generally planned to be low-, mid-, or high-rise. Building height maximums are prescribed by land use designations and local area policies. The subject site is designated Residential High-Rise which permits dwelling units in buildings that are above eight storeys, with a maximum height as specified in the Character Area or Special Site provisions (10.2.5.10). MOP 2051 notes if the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property.
- The Port Credit Local Area Plan ("PCLAP") includes policies for lands in south central Mississauga, noting high-rise building forms will be located near the GO transit station. The Port Credit Community Node has the potential to reach the targeted minimum density of 200 residents and jobs combined per hectare for the Port Credit PMTSA, noting the City will monitor the gross density and assess its ability to meet the target density over time (5.2.1). The PCLAP directs that permitted building heights for new development in the Community Node will support the Vision as an urban waterfront village and have regard for the existing context. Per Map 2B, height limits for the subject property are identified as having a minimum height of 2-storeys and maximum height of 15-storeys.

We appreciate the steps taken to respond to comments raised through the MOP 2051 public engagement process and would encourage further refinements to policies in response to stakeholder comments. Dream would be supportive of height permissions that are higher than those currently proposed and would have significant concerns if permitted maximum heights within PMTSAs were any lower than currently proposed.

As expressed by other stakeholders through written submissions and deputations to PDC, we also continue to have concerns regarding the City's position that no amendments will be permitted to PMTSA policies once implemented. We see an opportunity to be more flexible with potential amendments than what is currently contemplated. The intent of the Official Plan is to set the City's long-term vision and a framework to achieve that vision. The ability to amend Official Plan policies provides a degree of flexibility to account for site-specific considerations that cannot be captured in area-wide studies that inform Official Plan policies. We believe the restrictions on amendments to

PMTSA policies place unnecessary limitations on the flexibility of the Official Plan. We respectfully request the City reconsider its position on the ability of applicants to amend specific PMTSA policies.

We respectfully request Council consider our above comments and concerns while finalizing the proposed MOP 2051. Dream seeks to ensure that the PMTSA policy framework can achieve the goals of the Provincial Policy Statement (2020) and Growth Plan (2020, as amended), as well as support our shared goals of achieving sustainable, transit-oriented, and complete communities.

Please also accept this letter as our request for notice of all decisions and passage of by-laws in relation to the above.

Yours truly,



Justin Robitaille  
Development Lead  
[jrobitaille@dream.ca](mailto:jrobitaille@dream.ca)  
Dream Asset Management

cc: Paul Cope and Alex Heath, Dream Asset Management  
Rodney Gill, Goodmans LLP  
Ed Sajecki and Michi McCloskey, Sajecki Planning

March 17, 2024

File: 1211-001

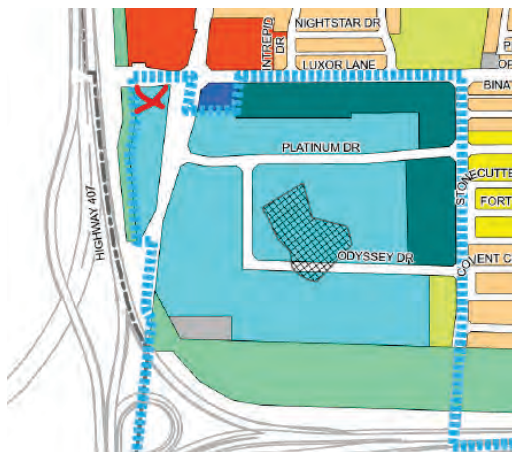
Via Email: [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)

Chairman and Members of the Mississauga  
 Planning and Development Committee  
 c/o Ms. Angie Melo, Legislative Co-ordinator  
 City of Mississauga  
 Clerks Department  
 300 City Centre Drive  
 Mississauga ON, L5B 3C1

To Whom It May Concern:

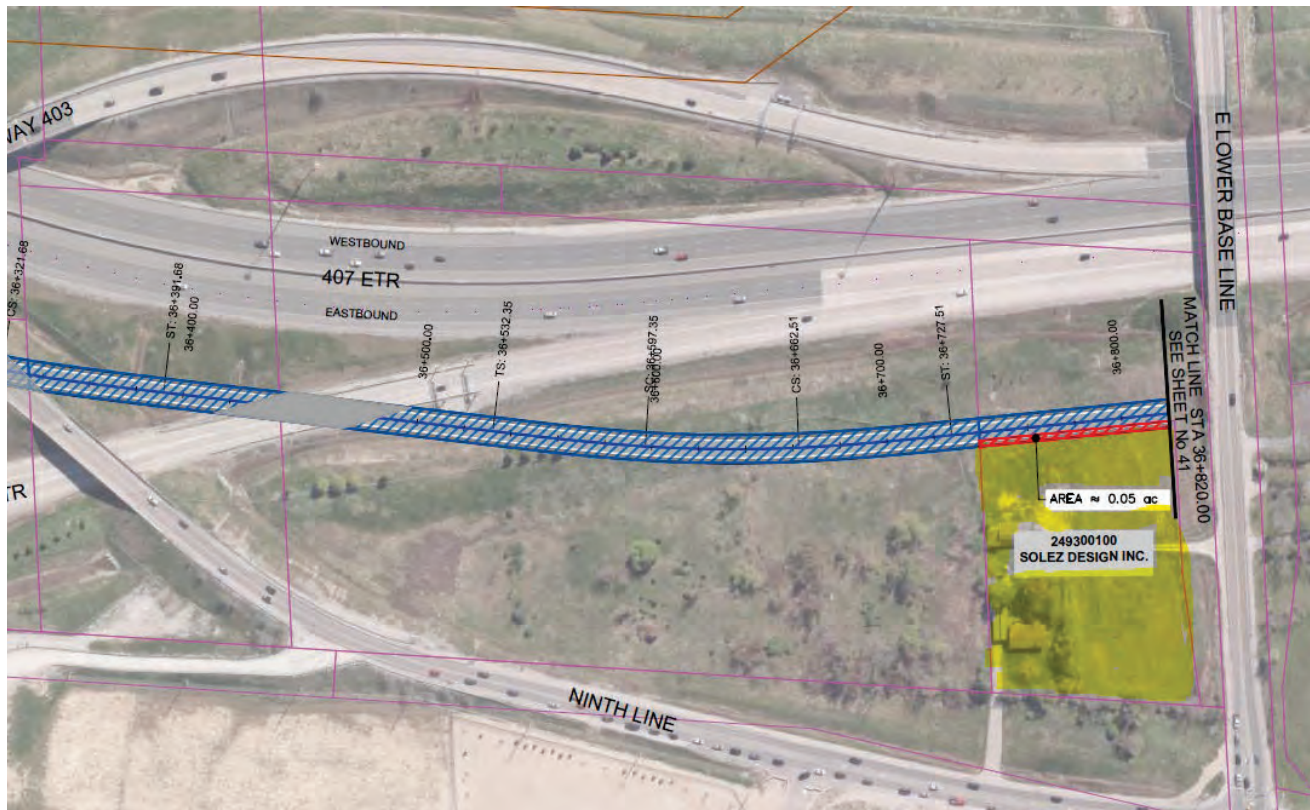
RE: Draft Mississauga Official Plan  
 Statutory Public Meeting  
 Comments OBO Solez Design Inc.  
4496 Ninth Line

Glen Schnarr and Associates Inc. (GSAI) act for Solez Design Inc., the owner of 4496 Ninth Line. The subject lands are located at the southwest corner of Ninth Line and Eglinton Avenue West which extends as Lower Baseline Road to the immediate west as it enters the Town of Oakville. The subject lands (identified below as a red "X") are designated "Business Employment" in the Draft Official Plan and comprise an area of approximately 2.38 acres. This site is encumbered by MTO right-of-way setbacks on the north and west side and has access to Ninth Line to the east, although this access is quite distanced as the result of surplus City owned lands that will remain following the recent EA for the Ninth Line widening.



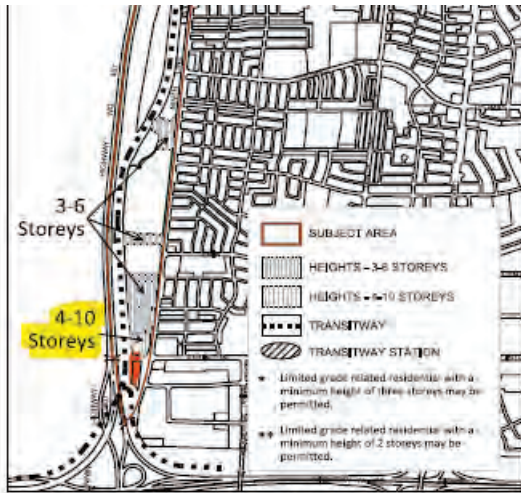
### Proposed Highway 407 Transitway

The subject lands are shown below highlighted in yellow on an aerial photo which better depicts the MTO and City restrictions which govern its ability to redevelop. This mapping identifies future requirements for the proposed 407 Transitway. The 0.05 acre area depicted in red identifies an additional area the MTO requires to protect for an underground tunnel within the MTO right-of-way. It is worthy to note that all of the vacant lands immediately south of the property, where Ninth Line tapers to the south, are owned by the Ontario Government. As is often the case, they will likely continue to hold these as vacant lands well into the future and until it is determined that all 407 Transitway requirements are met and the lands can be deemed surplus. There is also the potential that these lands will be kept for Transitway related infrastructure or as a staging area during Transitway construction.





### Ninth Line Corridor Study (OPA 90)



Map 16-24-2: Ninth Line Neighbourhood Character Area Land Use and Height

Map 16.20-2: Ninth Line Neighbourhood Character Area Height Limits

The Ninth Line Corridor Study, which culminated in the Council adoption of OPA 90, included these lands which are shown above as highlighted in orange. It is worthy to point out that the lands immediately to the north at the northwest corner of the same Ninth Line/Eglinton intersection are designated for midrise residential buildings in the 4-10 storey range.

It is our client's opinion that their lands at the same intersection are worthy of the same residential designation and that they should not form part of the larger Employment District east of Ninth Line as they are small orphaned parcel from this area. The fact that they were included in the Ninth Line Corridor Study Area and remained zoned "D", which is a transitional zone category, further supports this argument. On this basis, we request that as part of the ongoing Official Plan Review that these lands form part of the Ninth Line Corridor District and be designated for Residential Midrise uses, as this is the opportune time to modify.

Solez Design Inc. are in the process of preparing a development application to accommodate a midrise redevelopment to complete this intersection, have had discussions with the Ward 8 Councillor and are advancing a proposal shortly to the Development Application Review Committee (DARC). We believe this is an opportune time to assess the redevelopment feasibility of this property as an orphaned site which we believe is too small to fulfill its planned function under the proposed Business Employment designation which is being shown to be retained on these lands under the new Draft Mississauga Official Plan.

We trust that these comments and concerns will be considered and addressed as the new OP proceeds through further public consultation and appreciate the opportunity to provide comments.





Yours truly,

Jim Levac, MCIP, RPP  
Partner

Copy: Paul Bami, Dezine Corporation  
Councillor Matt Mahoney, Ward 8  
Ben Phillips, Planning and Building Department

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 956 – 008

(Via Email)

Planning and Building Department  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
 City Park Homes (Streetsville) Inc.  
 6 – 12 Queen Street South, 16 James Street & 2 William Street, City of Mississauga

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Glen Schnarr and Associates Inc (GSAI) are the planning consultants to City Park Homes (Streetsville) Inc. (the "Owner") of the lands municipally known as 6 – 12 Queen Street South, 16 James Street and 2 William Street, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated June 23, 2023, July 31, 2023 and March 15, 2024, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the west side of Queen Street South, south of Britannia Road. The Site, which is an assembly of parcels, is currently vacant and is located within the historic Streetsville community of the City. Based on the in-effect planning policy framework, the Site is located within the Streetsville Community Node, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), and is designated 'Mixed Use' and 'Residential Medium Density' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized employment-related development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for compact, mixed-use, pedestrian-oriented and transit supportive development to occur. This is strengthened by the Site's locational characteristics of being within 400 metres of existing transit services. Additionally, the Subject Lands are located within walking distance of various services, facilities, amenities, parks and greenspaces to meet the daily needs of residents and support Streetsville as a vibrant, complete, 15-minute community.

By way of context, the Subject Lands are subject to an active development application (City File No. OZ/OPA 21-014 W11). This development application will culminate in Official Plan Amendment 167 which will serve to re-designate the Subject Lands and introduce a new Special Site policy to the Streetsville Community Node Character Area. Following a thorough detailed review of the supporting studies, the redevelopment of the Subject Lands received City Council endorsement on February 14, 2024. An implementing By-law to give effect to Official Plan Amendment 167 will be presented to City Council for adoption in the near future.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

The draft policies propose revisions to Chapters 10 (Land Use Designations), 16 (Special Sites) and select Schedules among others. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as outlined below.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policy 8.4.1.17 as stated below is particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. Lastly, this policy will challenge implementation of the approved design for the Subject Lands. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

#### Chapter 10: Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions in comparison to existing permissions.

In the case of the Subject Lands, the proposed re-designation from 'Mixed Use' and 'Residential Medium Density' to 'Mixed Use' and 'Residential Low Rise II' is concerning. The proposed designations represent a down



designation of the Subject Lands but will also be contrary to City Council approval of Official Plan Amendment 167. We request that the Mississauga Official Plan 2051, including Schedule 7 and Chapter 16 (Special Sites) be updated to ensure the development permissions established by Official Plan Amendment 167 are incorporated.

In summary, we are concerned about the proposed select policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

Stephanie Matveeva, MCIP, RPP  
Associate

cc. Owner  
Ben Philips, Project Manager, Official Plan Review  
Leo Longo



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March 15, 2024  
(via email, [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca))

Chairman and Members of the Mississauga  
Planning and Development Committee  
c/o Ms. Angie Melo, Legislative Coordinator  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON  
L5B 3C1

**RE: PROPOSED MISSISSAUGA OFFICIAL PLAN 2051 PUBLIC MEETING  
PDC MEETING, MARCH 18, 2024, ITEM 6.4**

Dear Chairman and Members of the Committee,

I am writing to the Committee because the proposed Official Plan being presented by City staff does not conform to the Region Official Plan. This is a problem because the City is required to update its Official Plan to conform with the Region Official Plan. The Region's Official Plan states in Section 5.6.19.15 that the City must "...establish policies in their official plans that identify Planned Major Transit Station Areas and protect them for transit-supportive densities, uses, and active transportation connections." The proposed Official Plan being presented to the Committee does not protect for transit supportive densities in the Planned Major Transit Station Area (MTSA) in Streetsville.

I represent a land owner trying to develop land in Streetsville located at 51 Tannery St, 57 Tannery St, and 208 Emby Drive (the 'subject lands'). To support this proposal, I hired Sajecki Planning to study transit-supportive densities in Streetsville. They completed a report assessing what densities need to be achieved on individual parcels of land for the Planned MTSA in Streetsville to achieve transit-supportive densities. The report concludes that the subject lands (along with several other parcels) need to achieve a Floor Space Index (FSI) of 3.0 to achieve transit supportive density. We are proposing a building with heights ranging from 12 to 14 storeys and still only achieving an FSI of 2.47. The proposed Official Plan before the Committee includes restriction on height to be no taller than the width of the street next to the property. This would limit height to around 6 storeys on the subject lands.





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[montcrest.com](http://montcrest.com)

If we reduced the proposed building height to 6 storeys the density would considerably less and the City would be even further from achieving transit supportive densities.

This must be a mistake. It doesn't make sense otherwise. I would like the Committee to direct staff to investigate this further and to report back on how the policies being proposed will help achieve transit supportive densities in each Planned MTSA.

Please notify me of any decisions regarding this proposed amendment to the Official Plan.

Regards,

A handwritten signature in dark ink, appearing to read 'Tim Jessop', is written over a horizontal line.

Tim Jessop  
Vice-President of Development  
Montcrest Asset Management

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:***Glen Schnarr**March 15<sup>th</sup>, 2024

GSAI File: 1495-001

(Via Email)

Chairman and Members of the Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L3B 3C1

City Clerk  
 City of Mississauga  
 300 City Centre Drive - 2nd Floor  
 Mississauga, ON L5B 3C1

**RE: Mississauga Official Plan 2051**  
**City File: CD.02-MIS**

**3670 Hurontario Street**  
**MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC.**  
**Related File: #DARC 22-356**

Glen Schnarr & Associates Inc. (GSAI) are the authorized agents and planning consultants for MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC., owners of the property municipally addressed as 3670 Hurontario Street (herein referred to as the “subject lands”). Glen Schnarr and Associates Inc. (GSAI) is pleased to make this submission regarding the Mississauga Official Plan Review (the “draft Official Plan”) on behalf of MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC.

Planning applications for Removal of the (H) Holding Symbol and Site Plan Approval are currently underway through DARC 22-356 for the subject lands and to permit a high-rise development of two (2) interconnected mixed use, hotel and residential towers surrounding and integrated with the existing fourteen (14) storey Delta hotel at the southwest corner of Hurontario Street.

When complete, the draft Official Plan initiative will culminate in a new draft Official Plan (the “Mississauga Official Plan 2051”) that will modify the policy framework permissions for lands across the City. We understand that the final Official Plan will be considered by the Planning and Development Committee in Q2 of 2024. Following adoption by Council, the City's new Official Plan will be sent to the ultimate approval authority for final approval — either the Region of Peel or the Province of Ontario, depending on the coming-into-force date of forthcoming changes to the *Planning Act*.

We are pleased to provide the below comments on the current draft Official Plan, released on February 12, 2024 and to formally state our objection to the policies and Schedules as drafted.

### Urban Growth Centre

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the draft Official Plan. The subject lands remain in the Urban Growth Centre, Downtown Core and in Sussex District.

We object to Downtown Core policies that suggest increases in employment opportunities should be accommodated (Policies 12.2.4.2-3) and policies relating to the incorporation of office uses (Policy 12.2.4.4). The requirement for replacement of jobs or a concentration of jobs within a development is inconsistent with the development vision established by Provincial and Regional policy objectives for the Downtown Mississauga Urban Growth Centre. In accordance with the in-effect Provincial and Regional policy frameworks, an Urban Growth Centre is to provide for a range and mix of housing and employment uses to achieve high-density, mixed use areas, while supporting the creation of complete communities whereby residents are able to live, work, shop and play within their community of choice. Imposing employment minimums, quotas or thresholds is unnecessarily restrictive, will challenge the ability for lands to support the delivery of high density, compact, mixed-use forms and inadvertently places an emphasis on employment uses and density when the nature of a specific development may not warrant it. In our opinion, the provision of appropriate employment uses and density is a matter best addressed during the site-specific technical evaluation of a development application.

### Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. We object to draft Official Plan Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as provided below:

- 5.2.2. *Phased development will have a range and mix of housing types for each development phase.*
- 5.2.4. *To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*
- *social housing or other publicly funded housing; or*
  - *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*
- 5.2.5. *The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>

<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

We object to the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental tenure. The requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. Affordability guidelines and criteria need to be further examined and synthesized with Federal and Provincial criteria including the CMHC's affordable housing thresholds. Further, we object to policy statements that phased developments include a range and mix of housing types and the policy statement that 50% of new housing units be larger, family-sized or two and three-bedroom units. While we understand the intent of the policies is to encourage developments that enable housing choice, including for families, the policies as written are prohibitive and will challenge the delivery of needed housing units overall and should be considered on a site-specific basis.

### Complete Streets

We continue to object to the City's application and open-ended interpretation of how and to what extent road widenings and land conveyances can be secured and applied to development applications. New Policy 7.3.2.3 continues to provide only a general and overarching policy as to what can be secured:

*7.3.2.3 The City's multi-modal transportation network will be maintained and developed to support the policies of this Plan by:*

*b. designated right-of-way widths are considered the basic required rights-of-way along street sections. At intersections, grade separations or major physical topographical constraints, wider rights-of-way may be required to accommodate necessary features such as embankments, auxiliary lanes, additional pavement or sidewalk widths, transit facilities, cycling facilities or to provide for necessary improvements for safety in certain locations;*

The application and interpretation of this policy is inappropriate and as such we formally object to its inclusion in the draft Official Plan.

### Well Designed Healthy Communities

A new urban design-related policy framework is proposed and presented in Chapter 8, Well Designed Healthy Communities. We object to all overarching policies that stipulate urban design and building requirements. Urban design guidelines should be applied to a local area or on a site-specific basis.

Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

- 8.4.1.17. *Built form will relate to the width of the street right-of-way.*
- 8.4.5.2. *Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.*
- 8.6.2.5. *Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.*

The requirement for a built form to have a relationship to the width of the public right-of-way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location.

We object to policy statements that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards as City Standards for public open spaces do not always reflect site-specific redevelopment objectives and requirements. Provision of any POPS should be a collaborative effort between the parties involved.

We object to the introduction of urban design related policy or guidelines in the draft Official Plan including but not limited to any angular plane, views and vistas and separation distance requirements. Urban design objectives should continue to be implemented through an Urban Design Guideline document or Built Form Standard specific and appropriate to an area context. Urban design guidelines are the appropriate mechanism to facilitate the City's urban design objectives.

#### Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designation application to the subject lands and assigned to Protected MTSA (PMTSA) are illustrated on draft Schedule 8. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10 and on Schedule 7 – Land Use Designations, which does not illustrate the Downtown Mixed Use designation category.

Additionally, the policy framework presented by Policies 11.3.2 and 11.3.3 which provides that development on Downtown Mixed Use designated lands which results in a loss of non-residential floor space will not be permitted unless the planned function of the non-residential component will be maintained or replaced as part of redevelopment. As stated above, we object to any policy requirements that require replacement or increases of non-residential or employment area as this objective needs to be considered on a site-specific and development specific basis.

#### Sussex District

Policy 12.2.3.8 suggests that opportunities exist for additional office, ancillary and residential development in the Sussex District. As above, we object to any policy requiring employment or office development in any component of a redevelopment as it should be considered on a site-specific basis that considers the subject lands existing circumstances, built form, context, constraints and opportunities. We also object to requirements imposing reinvestments in the public realm through a development application. Improvements to the public realm should have consideration for the existing built form, nearby rights-of-way,



configuration of streets and sidewalks and other constraints before any informed decision can be made on their suitability and applicability through a site-specific development application.

#### Schedules and Mapping, Relationship to the Public Realm

On draft Map 12-2.3, a Proposed Pedestrian Connection on the subject lands or on Burnhamthorpe Road West is illustrated. As it is not clear to what the pedestrian connection will consist of and where exactly it will be located. We object to the illustration of a pedestrian connection in this location and it should be removed on the next iteration of the draft Official Plan.

On draft Map 12-2.7 – Downtown Core A & B Street Frontage, Sussex Gate and Enfield Place, adjacent to the subject lands are illustrated to be B Streets while Hurontario Street and Burnhamthorpe Road West are illustrated to be A Streets. We object to all policies that stipulate access, entrance or built form restrictions to either an A or B Street. In the case of the subject lands, there is an existing access to Hurontario Street and an operating hotel. The development contemplates retention of both and consideration in the A & B Street policies needs to be had for existing circumstances and on a site-specific basis where the A & B Street policy requirements cannot be met.

Policies 12.2.8.21 a-d. provide for requirements for above-grade parking structures and suggest that integrated above-grade parking structures will not directly front on to public streets and that they are required to have active or retail uses on the ground floor. We object to this policy requirement as the design of a podium or above grade parking structure should be developed on a site-specific basis and in consideration for existing constraints and opportunities.

Lastly, on Figure 12.5, an illustration provides for how podium and stepbacks are to be designed and provides for an angular plane and stepping requirements on a streetwall through build-to lines. We object to this requirement being imposed on the subject lands as existing buildings or redevelopment in an already constrained area may not be able to achieve these objectives specifically and as illustrated on draft Figure 12.5.

#### Glossary and Implementation

The draft Official Plan contains a refined glossary of key terms in Chapter 18. Of particular concern is the refined definition of the term “compatible”. Chapter 18-4 of the draft Official Plan states the term compatible is to be defined as follows:

*“means development that enhances the site and surrounding area without introducing unacceptable adverse impacts. Evaluating impacts includes considering contextually relevant matters such as land use, massing, scale, the environment, health, safety, noise, vibration, dust, odours, traffic, sunlight, shadow and wind. Compatible should not be narrowly interpreted to mean “the same as” or “being similar to”.”*

We object to the revised definition of compatible. As written, this definition does not adequately capture that compatibility can be interpreted in a variety of ways, however, compatible development does not require that existing conditions be replicated but rather a development can differ from existing development without creating unacceptable adverse impacts. The proposed definition can be narrowly interpreted and may result in a greater range of aspects to be considered in the evaluation of whether a development can be understood to be compatible. Furthermore, the term compatible is a term that is used extensively throughout the draft Official Plan and in sections relating to the Downtown Core.

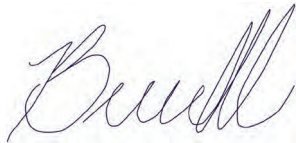
The draft Official Plan provides for new language (Policy 17.6) relating to the implementation and use of a Holding symbol to address specific requirements. We note and specifically object to the City's application of the word "provision of" whereas the current and in-force Official Plan provides that the "adequacy of" requirements be implemented prior to a Holding symbol being lifted. Use of the word "provision" suggests that all of the requirements listed will be required in an application to lift the Holding symbol, regardless of their necessity on a site-specific basis.

Summary

In summary, we object to the proposed policy and revisions outlined in the draft Official Plan. Given any development application must consider and conform with the Mississauga Official Plan in its totality, it is our opinion that many of the proposed policies are overly and unnecessarily restrictive and not appropriate to context or for the subject lands. Please continue to include GSAI in the Official Plan review initiative and any future updates, meetings and timelines to review and provide comments on new iterations the draft Official Plan prior to adoption.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



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Bruce McCall-Richmond, MCIP, RPP  
Senior Associate

cc. Ben Phillips, Project Manager, Official Plan Review



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

March 11, 2024

Ben Phillips, Project Manager  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON  
L5B 3C1

[official.plan@mississauga.ca](mailto:official.plan@mississauga.ca)

Dear Mr. Phillips:

**RE: COMMENT LETTER  
CITY OF MISSISSAUGA – DRAFT OFFICIAL PLAN  
HOME DEPOT OF CANADA INC.  
OUR FILE: 9316HA-40**

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On behalf of our client, Home Depot of Canada Inc. ("Home Depot"), we have reviewed the first draft of the City of Mississauga Official Plan (hereinafter the "Draft Official Plan"), relative to our client's existing sites and store operations located in the City of Mississauga, which includes the following sites:

1. 3065 Mavis Road (Store #7112)
2. 5975 Terry Fox Way (Store #7132)
3. 2920 Argentia Road (Store #7130)

Of particular interest, the Draft Official Plan does not include the existing special policy exemption for the Home Depot store located at 2920 Argentia Road (Store #7130). The Draft Official Plan currently omits a crucial special policy exception, which states, "**notwithstanding the provisions of the Business Employment designation, a retail warehouse, and accessory outdoor storage and display areas, will also be permitted**" (Policy 15.4.4.3.2).

We request that City staff address this oversight by reinstating the aforementioned special policy exemption for the 2920 Argentia Road store in the final version of the Official Plan. It is vital that this store's longstanding and legally recognized use for retail warehousing is preserved and acknowledged in the City's Official Plan.

On this basis and moving forward, we will ensure to continue to monitor the Draft Official Plan policies released as part of the initiative in consideration of Home Depot's sites, and we look forward to working with City staff and stakeholders as necessary throughout this process.

We kindly request to receive notifications regarding any decisions made by the City Council or Committee of Council pertaining to this matter.

If you have any questions, please do not hesitate to contact the undersigned.

Thank you.

Yours truly,

**MHBC**

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David A. McKay, MSc, MLAI, MCIP, RPP  
Vice President & Partner

A handwritten signature in black ink, appearing to read 'Linda Esho', written over the printed name.

Linda Esho, BA  
Planner

*cc. Home Depot of Canada Inc.*

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 236 – 005

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
Hillmond Investments Ltd.  
377 Burnhamthorpe Road East, City of Mississauga

Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to Hillmond Investments Ltd. (the 'Owner') of the lands municipally known as 377 Burnhamthorpe Road East, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are pleased to be providing this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the east side of Central Parkway East, north of Burnhamthorpe Road East. It is currently improved with a local retail plaza comprised of a low-rise multi-tenant commercial structure and surface parking areas. Based on the in-effect planning policy framework, the Subject Lands are located within the Rathwood Neighbourhood Character Area, is within the Central Parkway Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being within 300 metres of various street-level transit services, the Mississauga Transitway network. It is also within 1,000 metres of the Hazel McCallion Light Rail Transit (LRT) network. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Rathwood as a vibrant, complete, 15-minute community.

We have reviewed the draft Mississauga Official Plan 2051 ('Draft OP'), released on February 12, 2024. Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 14 (Neighbourhoods) and select Schedules. We



support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns as outlined below.

### ***Chapter 3: Directing New Development***

The Draft OP continues to provide guiding policy direction for how growth and development is to be managed in accordance with a City Structure. The proposed City Structure, as presented on Schedule 1, remains largely unchanged from the in-effect Mississauga Official Plan. In the case of the Subject Lands, the proposed City Structure continues to identify the Site as being located within the Neighbourhood component of the City Structure.

However, in accordance with the in-effect Provincial and Regional policy frameworks, the draft Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area given it is located within a Major Transit Station Area. While we support the continued use of a policy framework, structured by the City Structure, the continued inclusion of the Subject Lands within the Neighbourhoods component may further challenge the delivery of refined, optimized, redevelopment forms in an appropriate location.

### ***Chapter 5: Housing Choices and Affordable Homes***

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, thereby removing reference to housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include*

*a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased to a 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase “encouraged”. The re-phasing and use of the word “encourage” is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (20% or less) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain unit type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that

30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### *Chapter 8: Well Designed Healthy Communities*

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. It can also challenge the implementation of development, particularly when development fronts onto private streets which often have reduced ROW widths. For the reasons outlined above, this policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. In our opinion, the 45 degree angular plane requirement should be removed from the above-noted policy.

#### ***8.6.1., Buildings and Building Types***

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the Draft OP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. Of relevance to the Subject Lands, the Draft OP framework presents characterizations of high-rise built forms which as follows:

*c. High-rise buildings: they represent buildings with height maximums as prescribed by local area policies and land use designations. High-rise buildings, which can also be referred to as Tall Buildings in this Plan, provide transit-supportive densities and play an important role in allowing the city to meet its growth targets, especially within Strategic Growth Areas.'*

The above high-rise building characterization is concerning. Specifically, the Subject Lands are not subject to a Local Area Plan. Instead, it is subject to Neighbourhood Character Area policies and the applicable land use policies. The above characterization does not adequately capture the reality of development forms and does not provide for sufficient flexibility to accommodate high-rise or tall buildings at appropriate locations outside of Local Plan Area boundaries. For the above-noted reasons, we oppose the high-rise building characterization and request that it be modified to recognize the existence and allow permission for these built forms at appropriate locations across the City.

#### ***Chapter 10: Land Use Designations***

The draft OP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the Draft OP Schedule 7, Land Use Designations, a number of properties across the City have been re-designated or permissions otherwise modified. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions available in existing permissions. This is unacceptable and should not be carried forward.

In the case of the Subject Lands, the proposed land use designations (Schedule 7) are concerning. Specifically, Schedule 7 maintains the 'Mixed Use' designation on the Subject Lands and this is concerning. Section 10.2.6 of the Draft OP contains the parent Mixed Use policy framework which any development application must be evaluated.. We are concerned with Policies 10.2.6.2 and 10.2.6.3 as stated below.

*'10.2.6.2. The planned function of lands designated Mixed Use is to provide a variety of retail, service and other uses to support the surrounding residents and businesses. Development on Mixed Use sites that includes residential uses will be required to contain a mixture of permitted uses. This mix of uses is required in order to create complete communities with destinations that are close enough for walking and cycling to be the most attractive transportation option. In addition to mitigating traffic congestion, this enhances human health and reduces greenhouse gas emissions.'*

*'10.2.6.3. Redevelopment of Mixed Use sites must maintain the same amount of non-residential floor space.'*

The above-noted policies are concerning and require revision. Collectively, the above-noted policies are unnecessarily restrictive and may challenge the ability for lands to be appropriately redeveloped. Specifically, that a range of retail, service and other uses be provided can be a challenge for development proponents to accommodate and may challenge a proponent's ability to offer a sufficient and efficient non-residential floor area. Similarly, the policy requirement that existing non-residential floor area be replaced does not adequately accommodate the evolving context of communities and market trends. Furthermore, the policies noted above may hinder the development potential of designated Mixed Use lands and the lands' ability to support contextually appropriate development that is able to further implement Provincial, Regional and local policy objectives for compact, mixed-use, complete communities. Lastly, the above-noted policies do not satisfactorily reflect changing market trends nor does it enable a proponent to provide an appropriate amount of non-residential. Greater flexibility is needed to enable vibrant, compact, efficient redevelopment forms to be implemented in appropriate locations.

### ***Chapter 11: Transit Communities***

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8c, the Subject Lands are identified as being located within the Central Parkway Protected Major Transit Station Area (PMTSA), as not having a land use designation specified and as having a maximum building height permission of 2 to 4 storeys. We support the inclusion of the Subject Lands within the Central Parkway PMTSA given the Site's locational attributes. However, we request that additional policy direction



be provided to determine how development applications which seek building heights above and beyond those established by the MTSA Schedule are to be evaluated. In the case of the Subject Lands, while the height permissions are appreciated, they may also restrict development opportunities should an alternative development form be desired. Additionally, the identified maximum height of 4 storeys is contrary to the 8 storey height permission established for 1 acre Mixed Use sites in Neighbourhood Character Areas, as outlined in Policy 14.1.2.2. Sufficiently high height permissions are requested to ensure the ability of the Site to accommodate the provision of a high-quality, refined, efficient, compact, transit-supportive development that supports the Provincial and Regional objectives for MTSA lands is not challenged.

Furthermore, we are concerned with the MTSA land use policies, as presented in Chapter 11.3. Specifically, Policy 11.3.2 which states as follows is concerning:

*'11.3.2. Redevelopment within Mixed Use, Mixed Use Limited and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment.'*

*'11.3.3. Maintaining the non-residential planned function means providing:*  
*a) a concentration of convenient, easily accessible office, retail and service commercial uses that meet the needs of local residents and employees; and*  
*b) employment opportunities, such as office, recreation and institutional jobs.'*

As stated above, we are concerned with the policy requirements for replacement of non-residential area and its impact on the provision of much needed housing in accordance with Provincial policy and recent legislative changes related to the definition of "employment areas". In our opinion, the above-noted policies require modification to state that the provision of a variety of non-residential uses should be encouraged in a new development, rather than requiring non-residential area replacement. Non-residential uses are not specifically protected at the policy level and a blanket policy that would require their replacement is not in accordance with Provincial policy nor good planning

## **Chapter 14: Neighbourhoods**

Revisions are contemplated in Chapter 14 for lands located within the Neighbourhood component of the City Structure. In the case of the Subject Lands, the site is located within the Rathwood Neighbourhood Character Area. As such, it is subject to the parent Neighbourhood Character Area policies presented in Section 14.1.1, General, and Section 14.15, Rathwood Neighbourhood Character Area-specific policies.

When considered collectively, we are concerned with the refined Neighbourhood policy framework and in particular Policies 14.1.1.6 and 14.1.2.2 as stated below.

- '14.1.1.6. Intensification within Neighbourhoods may be considered where the proposed development is compatible in built form and scale to surrounding development, enhances the existing or planned development and is consistent with the policies of this Plan.'*
- '14.1.2.2. Within Neighbourhood Character Areas, development of Mixed Use sites that are over 1 ha in size will:*
- a. maintain the same amount of commercial floor space;*
  - b. ensure a significant range of retail and service commercial uses that meet the needs of the local population is provided;*
  - c. include a mix of low and mid-rise buildings with maximum heights not exceeding the width of the street right-of-way that they front onto, up to a maximum of 8 storeys;*
  - d. have a maximum floor space index (FSI) of 1.75 to guide the form, massing and density of proposed buildings;*
  - e. provide a well-connected road system, including the addition of public roads to encourage walking, cycling and support public transit;*
  - f. ensure roads surrounding blocks are public and meet City of right-of-way and design standards;*
  - g. provide public open space that is designed and located to create a central focus, in accordance with the policies of this Plan and the City's Park Plan;*
  - h. provide for appropriate massing and transition to surrounding context;*
  - i. ensure newly created blocks maximize connectivity, pedestrian walkability, vehicular access, servicing routes and internal permeability. Block perimeters will generally not exceed 520 m;*
  - j. include a variety of unit sizes and tenures to accommodate a range of households;*
  - k. explore opportunities for energy conservation through design and the use of renewable energy sources; and*
  - l. adhere to urban form and design policies of this Plan and the City's Green Design Guidelines.'*

Firstly, we are concerned with policy requirements for non-residential replacement. The policy requirement to replace existing non-residential floor space in a development is overly restrictive and will challenge an ability for proponents to provide a sufficient amount of non-residential space that is capable of accommodating the evolving contexts of communities and market trends. In addition to this concern, the above-noted policies when considered collectively are overly restrictive and require revisions. We oppose the maximum building height of 8 storeys identified and request that this height limitation be removed. Furthermore, the statement that intensification within Neighbourhoods may be considered is contrary to the policy objectives identified throughout the draft OP. While certain Neighbourhood Character Area lands are not suitable for higher density, compact, mixed-use development, the Subject Lands are an appropriate and desirable locations for this type of development to occur given it is located within a PMTSA. The statement that intensification may be considered will challenge the development potential of lands. Similarly, the policy requirements that a significant, without clarity on how significant is to be understood, range of retail and service commercial uses be provided, that a range and mixture of specified building types be provided and that public open spaces be provided amongst other matters are unnecessarily restrictive. These policy provisions should be removed and instead, sufficiently flexible evaluation criteria should be provided to enable contextually appropriate, compatible intensification developments to occur in appropriate locations.

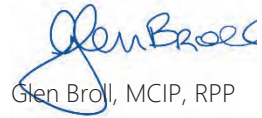
**Conclusion:**

In summary, we are concerned about the proposed policy directions outlined in the Draft OP and request that modifications as identified throughout this letter be made. Thank you for the opportunity to provide these comments. Our Client, the Owner, wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broil, MCIP, RPP

**Managing Partner**



Stephanie Matveeva, MCIP, RPP

**Associate**

cc. Hillmond Investments Ltd.  
Councillor Kovac  
Ben Phillips, Project Manager, Official Plan Review

March 13, 2024

GSAI File: Various

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
 City File: CD.02-MIS  
 Various Clients and properties, City of Mississauga

Glen Schnarr and Associates Inc (GSAI) is pleased to make this submission regarding the Mississauga Official Plan Review. GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City.

Further to our previous Comment Letters on the draft Mississauga Official Plan, we are pleased to provide general comments on the Mississauga Official Plan 2051, released on February 12, 2024.

#### Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- social housing or other publicly funded housing; or*
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policies and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

Additionally, the policy statement that phased developments include a range and mix of housing types and the policy statement that 50% of new housing units be larger, family-sized units are concerning. While we understand the intent of the policies is to encourage developments that enable housing choice, including for families, the policies as written are prohibitive and will challenge the delivery of needed housing units, in appropriate locations. We request that the policies be amended to encourage a range of dwelling units be provided in each development phase, where phased development is contemplated and that policy 5.2.4 be amended to encourage a reduced percentage (20% or less) of family-sized units to be provided.

#### Inclusionary Zoning

The draft MOP has incorporated the City's Inclusionary Zoning policy framework, which is largely in accordance with the Council adopted Official Plan Amendment policies and Inclusionary Zoning By-law. While we support the use of Inclusionary Zoning as one of many tools available to a municipality to encourage and secure affordable housing units, we are concerned with Policies 5.3.3.11 and 5.3.3.12 which identify that affordable housing units are to be a mix of one-bedroom, two-bedroom and three-bedroom units and to be affordable as well as the required price point for each affordable unit type. It is our opinion that the ultimate range and mixture of affordable units is best dealt with during the technical evaluation of a site-specific development application. Furthermore, requiring that an affordable housing



unit of a certain size be priced at a certain threshold may challenge the delivery of new housing units given current and evolving market patterns and consumer preferences.

Finally, we are concerned with Table 5.2 and Policy 5.3.3.13. In accordance with Bill 23, the length of an Inclusionary Zoning affordable unit term was to be reduced to a maximum of 25 years and the ultimate set aside rate, regardless of a property's location within an Inclusionary Zoning Area, was to be reduced to 5%. We understand that the above-noted modifications are subject to implementing regulation changes to Ontario Regulation 232/18 in order to become in full force and effect. While we understand that the amendment to Ontario Regulation 232/18 remains forthcoming, greater clarity on how the affordability period of a unit and the set aside rates conform to the evolving Provincial policy framework is requested.

#### Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

- '8.4.1.17.        *Built form will relate to the width of the street right-of-way.'*
- '8.4.5.2.        *Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*
- '8.6.2.5.        *Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policies are concerning and require re-evaluation. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ("ROW") on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location. Furthermore, a limitation of building height to relate to the ROW width is contrary to the practice being imploded in other jurisdictions across the Greater Toronto Area, will challenge the delivery of high-quality, refined, efficient, compact, transit supportive development forms in the desired locations and will hinder the development potential of lands. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

An additional concern is the application of City Standards for public open spaces when Privately Owned, Publicly Accessible Spaces (POPS) are to be provided. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.

Finally, we are concerned with the universal application of a 45 degree angular plane as one tool available to ensure appropriate transition is provided. In our opinion, Policy 8.6.2.5 requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive. Therefore, we request that the angular plane requirement be removed from the above-noted policy.

#### Buildings & Building Types

The draft MOP proposes refinements to the policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. We are particularly concerned with the policy framework regarding mid-rise buildings. In accordance with Section 8.6.1.b of the draft Official Plan, a mid-rise building is characterized as follows:

*'in Mississauga, mid-rise buildings are generally higher than four storeys with maximum heights as prescribed by area-specific policies and land use designations. Their height should not exceed the width of the right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings can accommodate many uses and provide transit-supportive densities yet are moderate in scale, have good street proportion, allow for access to sunlight, have open views to the sky from the street, and support high-quality, accessible open spaces in the block. Mid-rise buildings provide good transition in scale to adjacent low-rise built forms.'*

As stated in this Letter, the above characterization of a mid-rise building is concerning. In our opinion, a mid-rise building can provide an appropriate transition in various ways and is required to be informed by the immediate surrounding context. The requirement that a mid-rise building have a height limited by the right-of-way on which it fronts is contrary to good planning objectives and will challenge the development potential of sites, while also challenging the delivery of vibrant, high-quality, efficient, compact, transit-supportive development forms. We request that this characterization be removed.

#### Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City have been re-designated. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions in comparison to existing permissions.

We are also concerned with the inconsistent land use designation categories assigned to lands. Specifically, the land use designation categories outlined on Schedule 7 is in contrast and at times, in conflict with the land use designations identified for Protected Major Transit Station Area lands on Schedule 8. Given we understand that the Major Transit Station Area policies (Chapter 11) are to prevail in the event of a conflict, we respectfully ask that the land use designations assigned to lands on Schedule 7 be re-examined.

In addition to the above, we are concerned with the policy framework for Residential Mid-Rise, Residential High-Rise and Mixed Use designated lands. Specifically, Policy 10.2.5.8 limits the height of designated Residential Mid-Rise lands to a minimum height of 5 storeys and a maximum height that is no greater than the width of the street right-of-way on which it fronts, up to a maximum of 8 storeys. Policy 10.2.5.10 states that designated Residential High-Rise lands will permit heights above 8 storeys, up to a maximum specified in the Character Area or Special Site provisions. Alternatively, if a maximum height is not specified in the Character Area or Special Site provisions, then Residential High-Rise designated lands will have a maximum height that cannot exceed the tallest building on the property. And finally, Policy 10.2.6.3 states that redevelopment of designated Mixed Use sites must maintain the same amount of non-residential floor space. The above-noted policies are problematic and should be revised.

As stated above, the application of a maximum building height for a mid-rise building that relates to a street right-of-way width is concerning, is contrary to best practices and should be removed. Similarly, the limitation of building height to existing conditions on designated Residential High-Rise sites where there is no further guidance in Character Area or Special Site provisions is contrary to good planning and will adversely and unnecessarily limit the development potential of lands. This policy requires revision to allow for building height to be evaluated in a different manner. Finally, the Mixed Use policy requiring non-residential replacement is contrary to good planning objectives, will unnecessarily restrict the ability for well-designed, compact, mixed-use, transit-supportive developments to be implemented. In our opinion, this policy also does not adequately reflect the evolving community contexts, market trends nor a property owner's ability to right-size non-residential areas to ensure there is not an oversupply of vacant spaces. For the above-noted reasons, we request that Policies 10.2.5.8, 10.2.5.10 and 10.2.6.3 be revised. If the policies are not revised, it is our opinion that the policy framework as contemplated will hinder a property's ability to support contextually appropriate development that is able to further implement Provincial, Regional and local policy objectives for compact, mixed-use, complete communities.

#### Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

Additionally, the policy framework presented by Policies 11.3.2 and 11.3.3 which state that development of Mixed Use, Mixed Use Limited and Downtown Mixed Use designated lands which results in a loss of non-residential floor space will not be permitted unless the planned function can be demonstrated is concerning. As stated above, we are concerned with the policy requirements for replacement of non-residential area. In our opinion, the above-noted policies require modification to state that the provision of a variety of non-residential uses should be encouraged in a new development, rather than requiring non-residential area replacement.

Lastly, we are concerned regarding the maximum height permissions identified on Schedule 8. In our opinion, the maximum building height established for some MTSA lands is low and will unnecessarily limit the development potential of lands in locations where higher density, taller, transit-supportive development ought to be located based on the in-effect Provincial and Regional policy objectives. Furthermore, the proposed building height maximums will be a barrier to supporting efficient, high-quality development from occurring and will be a barrier to supporting greater housing choice, while we are in the midst of a Provincial housing crisis. Based on the above, evaluation criteria should be established for how additional permitted heights can be permitted.

#### Urban Growth Centre:

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. We also highlight that revisions have been made to the Downtown Core, Fairview, Cooksville and Hospital Urban Growth Centre Character Areas. Overall, these revisions appear to be consistent with those revisions arising from the City Council adopted Downtown Fairview, Cooksville and Hospital {Policy Review in 2022.

Overall, we are concerned with portions of the Urban Growth Centre policy framework, particularly those policies which state that redevelopment of lands which results in a significant reduction in the number of jobs that could be accommodated on the site will not be permitted (Policy 12.1.1.5) and those that state development must demonstrate how a concentration of jobs can be accommodated (Policy 12.1.1.6). In our opinion, these policies require revision to soften the requirement for job replacement or concentration. The requirement for replacement of jobs or a concentration of jobs within a development is inconsistent with the development vision established by Provincial and Regional policy objectives for the Downtown Mississauga Urban Growth Centre to support the creation of a vibrant, compact, mixed-use, transit supportive, complete community.

Similarly, we are concerned with the Urban Growth Centre policy framework for designated Office lands. In particular, Policy 12.1.3.5 states that redevelopment of existing office buildings that result in the loss of office floor space will not be permitted, unless the same amount of office space is retained or replaced through new development. The above-noted policy requires revision as it unnecessarily restricts the development potential of lands. It also does not adequately capture a developer's ability to right-size office space based on market trends and tenant preferences. Finally, the policy is contrary to the development vision for Urban Growth Centre lands as appropriate and desirable location for compact, mixed-use, pedestrian-oriented and transit supportive development forms to locate in order to support the Urban Growth Centre as a whole as a vibrant, attractive, complete, 15-minuty community. The requirement for office floor space to be replaced will challenge the ability to deliver much needed mixed-use developments in the midst of a Provincial housing crisis.

Finally, the introduction of angular plane requirements and building separation distances to Official Plan policy is concerning. These are urban design objectives which can and should continue to be implemented through Built Form Standards. We request that the policy requirement for 45 degree angular plane treatments and a minimum building separation distance, as measured between structures above a certain height, be removed.

#### Glossary

The draft Official Plan contains a refined glossary of key terms in Chapter 18. Of particular concern is the refined definition of the term compatible. Chapter 18-4 of the draft Official Plan states the term compatible is to be defined as follows:

*'means development that enhances the site and surrounding area without introducing unacceptable adverse impacts. Evaluating impacts includes considering contextually relevant matters such as land use, massing, scale, the environment, health, safety, noise, vibration, dust, odours, traffic, sunlight, shadow and wind. Compatible should not be narrowly interpreted to mean "the same as" or "being similar to".'*

The above-noted definition is concerning and is unnecessarily restrictive. As written, this definition does not adequately capture that compatibility can be interpreted in a variety of ways, however, compatible development does not require that existing conditions be replicated but rather a development can differ from existing development without creating unacceptable adverse impacts. The proposed definition can be narrowly interpreted and may result in a greater range of aspects to be considered in the evaluation of whether a development can be understood to be compatible. Furthermore, the term compatible is a term that is used extensively throughout the draft Official Plan. Based on the above, we request that the definition of compatible be returned to that included in Section 1.1.4.r of the in-effect Mississauga Official Plan which is as follows:

*'means development, which may not necessarily be the same as, or similar to, the existing or desired development, but nonetheless enhances an established community and coexists with existing development without unacceptable adverse impact on the surrounding area.'*

#### Summary

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. It is our opinion that many of the proposed policies are overly and unnecessarily restrictive. Should the proposed policy framework, as currently contemplated, remain unchanged, we expect that an increased number of privately-initiated Official Plan Amendments would be triggered. An increase in these applications will result in additional pressures on already constrained staff and resources.

Given any development application must consider the Mississauga Official Plan in its totality, we look forward to the opportunity to review the refined draft Mississauga Official Plan. Thank you for the opportunity to provide these comments. GSAI wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption. We look forward to being involved.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

cc. Ben Phillips, Project Manager, Official Plan Review



Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 893-001E

Via Email: [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)

Chairman and Members of the Mississauga  
Planning and Development Committee  
c/o Ms. Angie Melo, Legislative Co-ordinator  
City of Mississauga  
Clerks Department  
300 City Centre Drive  
Mississauga ON, L5B 3C1

To Whom It May Concern:

**RE Mississauga Official Plan Review – February 2024 Draft**  
**City File: CD.02-MIS**  
**65 Park Street East**  
**Owner: Park Heights Ltd.**  
**City of Mississauga, Region of Peel**

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Glen Schnarr & Associates Inc. is pleased to make this submission regarding the City of Mississauga Official Plan (the “Official Plan”) review on behalf of Park Heights Ltd., owner of 65 Park Street East (herein referred to as the “Subject Property”). The Subject Property is located at the southeast corner of Park Street E and Helene Street N, within the Port Credit Community Node and is currently designated as “Residential High Density” on the in-effect Land Use Schedule 10 in the Mississauga Official Plan. As per the draft Official Plan, the Subject Property is proposed to be redesignated as “High-Rise” in accordance with the proposed new land use designations. The Subject Property is also within the Port Credit GO Primary Major Transit Station Area (“PMTSA”) and on draft Schedule 8n, permitted heights are proposed at 2 to 15 storeys. The Subject Property is currently occupied by an apartment building. GSAI has been monitoring the Official Plan review on our client’s behalf, considering their future redevelopment potential and opportunities in consideration of maintaining the existing building or other site redevelopment options.

GSAI submitted our initial concerns and comments regarding Bundle 3 policies in a comment letter dated June 23, 2023, noting that detailed comments would be forthcoming, as well as a follow up letter dated July 31, 2023. Further to our previous letters, please find attached our scoped comments with regards to the Subject Lands (Appendix 1).

We note there are proposed changes to the Port Credit Local Area Plan (“PCLAP”), however at this time we have no comments. We wish to note the PCLAP needs to reflect the policy direction of the Regional Official Plan approval.



Thank you for the opportunity to provide comments. We look forward to working with staff through next steps.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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**Jennifer Staden, MCIP, RPP**  
**Associate**

cc. *Park Heights Ltd.*  
*Ben Phillips, Project Manager, Official Plan Review*

APPENDIX 1:

May 2023 Draft Policy	GSAI response – July 2023	February 2024 Draft Policy	GSAI response – March 2024
Rental Housing and Affordable Housing			
5.1.4 To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units will include a minimum of 30 per cent of the total number of units as 2-bedroom units and a minimum of 10 per cent of the total number of units as 3-bedroom units. The City may reduce these requirements where development is providing: social housing or other publicly funded housing; or specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients, employees or people with special needs.	As previously noted, in our opinion, the above-noted draft policies should be modified. More specifically, Policy 5.1.4 should be modified to encourage a selection of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for a large percentage (40%) of units to be of a certain type will challenge Provincial and Regional policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.	5.2.4 To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing: a. social housing or other publicly funded housing; or b. specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients, employees or people with specific needs.	We acknowledge that the policy has been revised from “will include” to “are encouraged to include”. We thank staff for addressing our previous comment.  It is our opinion that despite the revisions to this policy requesting a large percentage of units to be a specific type could still challenge Provincial and Regional policy objectives of delivering a variety of affordable and attainable housing options for current and future residents.  The policy statement that phased developments include a range and mix of housing types and the policy statement that 50% of new housing units be larger, family-sized units are concerning. While we understand the intent of the policies is to encourage developments that enable housing choice, including for families, the policies as written are prohibitive and will challenge the delivery of needed housing units, in appropriate locations. We request that the policies be amended to encourage a range of dwelling units be provided in each development phase, where phased development is contemplated and that policy 5.2.4 be amended to encourage a reduced percentage (20% or less) of family-sized units to be provided.
	No formal comment previously.	5.2.2. Phased development will have a range and mix of housing types for each development phase.	
5.1.7 The City will advocate to the Federal and Provincial governments to increase funding and incentives as well as improved cost-sharing arrangements that support the development of permanent and long-term affordable housing to	Policy 5.1.7, as contemplated, should be modified to clarify that affordable housing units are required to be provided in select, strategic locations such as Protected Major Transit Station Areas, in accordance with the	5.2.7 The City will Support the Region as the Housing Service Manager by advocating to the Federal and Provincial	GSAI maintains our previous comment. This policy should be revised to clarify affordable units should be required in strategic locations (Major

achieve the City and Regional objectives and to support full implementation of the Regional Housing Strategy and the Peel Housing and Homelessness Plan.	Regional and local Inclusionary Zoning policy framework. The above-noted policies are blanket policies which seem more appropriate in a guideline (similar to City of Toronto and their “Growing Up” Guidelines). If the objective of these policies is to deliver more affordable and rental housing, the City should also consider using their ability to incentivize this type of housing (Development Charges refunds, streamlined processes, etc.), to offset market demand requirements.	governments to increase funding and incentives as well as improved cost-sharing arrangements that support the development of permanent and long-term affordable housing. This will help achieve the City’s objectives and support full implementation of the Regional Housing Strategy and the Peel Housing and Homelessness Plan.	Transit Station Areas) where Inclusionary Zoning is applicable.								
<p><i>Table 1 – Peel-Wide New Housing Unit Targets</i></p> <table><tr><th>Target Area</th><th>Targets</th></tr><tr><td>Affordability</td><td>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</td></tr><tr><td>Rental</td><td>That 25% of all new housing units are rental tenure</td></tr><tr><td>Density</td><td>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</td></tr></table>	Target Area	Targets	Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households	Rental	That 25% of all new housing units are rental tenure	Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy		Table remains unchanged	The above-noted policies and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property’s location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.
Target Area	Targets										
Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households										
Rental	That 25% of all new housing units are rental tenure										
Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy										
5.2.4.3 Mississauga will ensure purpose-built rental apartments are retained to provide housing options for		No changes to draft policy.	GSAI maintains our previous position. While rental units should be encouraged (both through								

<p>varying lifestyle and economic needs. The City may prohibit and regulate the demolition of residential rental properties and may prohibit and regulate the conversion of residential rental properties to a purpose other than the purpose of a residential rental property, in accordance with the provisions of the Municipal Act.</p>	<p>encouraged (both through replacement and new units), the above-noted policies as currently written are very prohibitive. The policies do not account for very old rental buildings which need replacement, nor do they account for replacement rental units being incorporated with a mix of uses to create more complete communities.</p>	<p>replacement and new units), the above-noted policies as currently written are very prohibitive. The policies do not account for very old rental buildings which need replacement, nor do they account for replacement rental units being incorporated with a mix of uses to create more complete communities. We believe the threshold of 6 units is too low and could result in being cost prohibitive for redevelopment projects. With respect to 5.2.4.7, we believe more flexible language should be used to account for outright stopping of projects with a 2.99% vacancy rate. As well, the way we understand 5.2.4.7 is this only permits renovations, not demolition and replacement. Demolition permissions should be added.</p>	<p>replacement and new units), the above-noted policies as currently written are very prohibitive. The policies do not account for very old rental buildings which need replacement, nor do they account for replacement rental units being incorporated with a mix of uses to create more complete communities. We believe the threshold of 6 units is too low and could result in being cost prohibitive for redevelopment projects. With respect to 5.2.4.7, we believe more flexible language should be used to account for outright stopping of projects with a 2.99% vacancy rate. As well, the way we understand 5.2.4.7 is this only permits renovations, not demolition and replacement. Demolition permissions should be added.</p>
<p>5.2.4.4 The City will regulate: a) the conversion of residential rental units to any other form of tenure in properties with six or more dwelling units. b) the demolition of existing residential rental units in properties with six or more dwelling units.</p>	<p>We believe the threshold of 6 units is too low and could result in being cost prohibitive for redevelopment projects. With respect to 5.2.4.7, we believe more flexible language should be used to account for outright stopping of projects with a 2.99% vacancy rate. As well, the way we understand 5.2.4.7 is this only permits renovations, not demolition and replacement. Demolition permissions should be added.</p>	<p>No changes to draft policy.</p>	<p>No changes to draft policy.</p>
<p>5.2.4.7 Demolition or conversion of rental properties will only be permitted where: a) the average rental vacancy rate within the City is at or above three (3) percent over the preceding three year period; b) the conversion to ownership housing would result in the creation of affordable housing; or c) the demolition or conversion is needed to address existing health and safety issues through retrofits and renovations, which would result in an increase in rental levels above the threshold for affordability.</p>	<p>With respect to affordable housing, a more effective approach might be to incentivize affordable housing for developers in ways such as, speeding up process of these units/ projects, reduced fees, no Development Charges, etc. We trust the Official Plan policies will follow direction from the Province with respect to rental replacement and be consistent with/conform to all applicable Provincial legislation.</p>	<p>No changes to draft policy.</p>	<p>With respect to affordable housing, a more effective approach might be to incentivize affordable housing for developers in ways such as, speeding up process of these units/ projects, reduced fees, no Development Charges, etc. We trust the Official Plan policies will follow direction from the Province with respect to rental replacement and be consistent with/conform to all applicable Provincial legislation.</p>
Changes to Land Use Designations and Maximum Heights			
<p>Lands designated as “Residential High-Rise” will permit: “dwelling units in buildings that are above eight storeys, with a maximum as specified in the Character Area or Special Site provisions. If the Character Area does not specify a maximum height, then the maximum height will not be greater than the tallest existing building on the property.”</p>	<p>As noted in the GSAI letter dated July 31, 2023, we have great concerns with embedding maximum heights into Official Plan policies. Furthermore, in the draft policies, GSAI has concerns with this policy, specifically that maximum heights will not be greater than existing heights on site, as this could stifle redevelopment opportunities and architectural creativity. If a site is being redeveloped, it shouldn't be restricted to the height</p>	<p>No changes to draft policy. Schedule 8n released showing permitted heights on property of 2-15 storeys.</p>	<p>GSAI maintains our position that we have concerns with permitting maximum heights not greater than existing heights on site, as this could stifle redevelopment opportunities and architectural creativity. If a site is being redeveloped, it shouldn't be restricted to the height that was deemed appropriate at a previous time (sometimes decades earlier). This seems to</p>



	<p>that was deemed appropriate at a previous time (sometimes decades earlier). This seems to contradict the very intent and purpose of intensification and considerations of the ever-evolving Provincial policy framework.</p>	<p>contradict the very intent and purpose of intensification and considerations of the ever-evolving Provincial policy framework.</p> <p>Furthermore, a 15 storey height maximum on our client's lands seems arbitrary and should be increased to at least 22 storeys, similar to the surrounding lands. The proximate location of this parcel of land to existing and future transit infrastructure makes it an ideal candidate site for greater intensification with a higher chance of increasing transit mobility. This height as a minimum for consideration also seems important from a place-making/skyline consideration for the broader area.</p> <p>In our opinion, the implementation of maximum heights in the draft Mississauga Official Plan does not reflect what can be achieved in these areas where compact, mixed-use, transit-supportive development is to be directed. Further, these maximum heights have been identified without careful analysis and will limit the redevelopment potential of lands where transit-oriented, mixed-use development ought to occur. Contrary to good planning, these maximum heights will become a barrier to accommodating development in appropriate locations, in proximity to higher order transit where higher density, transit-supportive development ought to be, and will be a barrier to supporting greater housing choice and the delivery of 1.5 million new housing units challenging the implementation of Provincial policy objectives. We feel, conversely, that with respect to PMTSAs, the City of Mississauga should include policies that provide flexibility</p>
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		<p>that better account for specific locational considerations that align with the aspirations of PMTSA's. The limit on height also continues to create a height disparity between the City's core with unlimited heights and a Major Node with a 25 storey height limit. Height can be deployed to emphasize the urban hierarchy, placemaking, and significant points of interest such as a key/major intersection. A 25 storey height limit essentially creates monotony in the City skyline and offers no distinctions for a Major Node from many other elements of the City hierarchy. This is further compounded by existing buildings throughout the City, both in neighbourhoods and in various nodes which already are close to or exceed the 25 storey limit.</p> <p>With specific regard to the site, implementing a height cap is particularly concerning as not only is it situated within a PMTSA, the Subject Property is situated in a Community Node and steps away from an Intensification Corridor (Huronario Street). These Strategic Growth Areas require distinct policy approaches to support contextual sensitivity. We are of the opinion that restricting heights of tall buildings, within the MOP, is counterintuitive to the role of strategic growth areas and further, should be evaluated on a site-by-site basis, capitalizing on otherwise underutilized lands. The prescription of restrictive heights in strategic areas presents missed opportunities to capitalize on public infrastructure investments (transit, services etc.) and appropriately allocate growth to target areas, consistent with broader, critical Provincial, Regional and Municipal policies. The</p>
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			establishment of maximum heights in PMTSAs, where compact, mixed-use, transit-supportive development is to be directed, has significant implications on the achievement of a number of Provincial objectives.
<b>Community Nodes</b>			
<i>13.1.1.3 Development applications within Nodes proposing a change to the designated land use, which results in a significant reduction in the number of jobs that could be accommodated on the site will not be permitted unless considered through an official plan review or update.</i>	We understand 13.1.1.3 to mean that a change in land use which results in a reduction in jobs cannot be achieved through a privately initiated application. This seems incredibly prohibitive. For example, all across the GTA there are redevelopment projects of commercial (mall or plaza) sites for intensifying with residential land uses. Oftentimes the introduction of residential uses to a commercial site enables the property to achieve true mixed use, complete community objectives. This policy seems to outright prohibit private development applications which could achieve broader planning and community goals.	<i>No changes to draft policy.</i>	GSAI maintains our previous position. We understand 13.1.1.3 to mean that a change in land use which results in a reduction in jobs cannot be achieved through a privately initiated application. This seems incredibly prohibitive. For example, all across the GTA there are redevelopment projects of commercial (mall or plaza) sites for intensifying with residential land uses. Oftentimes the introduction of residential uses to a commercial site enables the property to achieve true mixed use, complete community objectives. This policy seems to outright prohibit private development applications which could achieve broader planning and community goals.
<i>13.1.1.4 Proponents of development applications within a Node may be required to demonstrate how new development contributes to the achievement of the residents and jobs density target and the population to employment ratio provides for a concentration and mix of jobs as a key component of transit-supportive development.</i>		<i>No changes to draft policy.</i>	
<i>13.1.1.5 A mix of mid-rise and high-rise housing, community infrastructure, employment, and commercial uses, including mixed use residential/commercial buildings and offices will be encouraged in Major Nodes and Community Nodes. However, not all of these uses will be permitted in all areas.</i>	While we agree with the first part of this policy, we respectfully disagree with “however, not all of these uses will be permitted in all areas”, as it seems to contradict the first part of the policy. This policy should have flexibility built in for land uses to be sited where most appropriate, given the site and local context.	<i>No changes to draft policy.</i>	GSAI maintains our previous position. While we agree with the first part of this policy, we respectfully disagree with “however, not all of these uses will be permitted in all areas”, as it seems to contradict the first part of the policy. This policy should have flexibility built in for land uses to be sited where most appropriate, given the site and local context.
<i>13.3.2.1 For lands within a Community Node a minimum building height of two storeys to a maximum building height of four will apply unless specified by the Character Area policies, in Major Transit Station Area Schedule 8 or Special Site policies.</i>	As previously noted, we disagree with maximum heights being included in the Official Plan. The appropriate height of a development should be evaluated on site by site basis. Furthermore, as per correspondence from Minister Clark, dated May 12, 2023, there should be no height maximums for PMTSAs, sites should be	<i>13.3.2.1 For lands within a Community Node a minimum building height of two storeys to a maximum building height of four will apply unless specified by the applicable Land Use Designation, Character Area</i>	This policy has not materially changed. As previously noted, we disagree with maximum heights being included in the Official Plan. The appropriate height of a development should be evaluated on site by site basis.

	intensified in consideration of proximity to transit infrastructure (GO Station, MiWay, Hurontario LRT).	<p><i>policies, and in Major Transit Station Area or Special Site policies.</i></p> <p><i>No changes to draft policy.</i></p>	
<p><i>13.3.2.3 Lands within the Community Nodes that are designated Residential Mid-Rise will permit buildings up to 12 storeys, unless otherwise specified in Major Transit Station Area Schedule 8, or Special Site policies. Mid-rise buildings will be designed in accordance with the applicable policies of this Plan.</i></p>			

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 746 – 038

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: Mississauga Official Plan 2051  
 Creekside Industrial GP Inc.  
 0 Tahoe Boulevard, City of Mississauga

Glen Schnarr and Associates Inc (GSAI) are the planning consultants to Creekside Industrial GP Inc. (the "Owner") of the lands municipally known as 0 Tahoe Boulevard, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated June 23, 2023, July 31, 2023 and March 15, 2024, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the south side of Tahoe Boulevard, east of Buckhorn Gate. The Site, which is an assembly of three (3) parcels, is currently vacant. A forested area and agricultural fields are also present. Based on the in-effect planning policy framework, the Site is located within the Airport Corporate Centre Character Area, within the Tahoe Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), is designated 'Business Employment' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan) and is zoned 'Greenlands (G2)' and 'Employment, Exception 40 (E2-40)'. Based on the above, the Site has recognized employment-related development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for employment-related development to occur. This is strengthened by the Site's implementing zoning permissions which permit a broad range of employment-related uses, including warehousing. Additionally, the Subject Lands are located within an established employment-related area of the City.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.



The draft policies propose revisions to Chapters 8 (Well Designed Healthy Communities), 9 (Supporting Jobs and Businesses), 10 (Land Use Designations), 11 (Transit Communities), 15 (Employment Areas) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.2.6 and 8.6.11 as stated below are particularly concerning:

*'8.2.6. Mississauga will encourage green building design and practices to help achieve its greenhouse gas emission targets and adapt to the changing climate.'*

*'8.6.11. All buildings should be designed to incorporate innovative green and sustainable technologies, including, where appropriate, considerations for alternative and renewable sources of energy. ...'*

As written, these policies are concerning and require modification. In our opinion, the above-noted policies require revision to provide for sufficient flexibility based on a development's attributes, scale and typology. We acknowledge and support the City's desire to encourage developments to implement best practices and sustainable development practices; however, sustainable and best practices must consider development on a site-by-site basis. Furthermore, we are concerned that the above-noted policies do not contain sufficient clarity on how employment-related development will be "encouraged to" incorporate green building design and practices. As written, the onus remains on an individual property owner to comply with the City's evolving and changing policies in this regard. Greater clarity and transitional policy are required to enable developments to proceed which are efficient and appropriately designed, without making employment-related development inefficient and cost prohibitive.

#### Chapter 9: Supporting Jobs and Businesses

The draft MOP proposes refinements to the employment policy framework. These refinements are concerning. In accordance with the draft Schedule 1, City Structure, a number of Employment Areas are identified. The Airport Corporate Centre is not identified as an Employment Area. This absence from Schedule 1 is concerning and in contradiction with the policy framework established by Chapter 9 as a whole. In particular, Section 9.1 identifies that the City of Mississauga contains a diversity of Employment Areas, which includes the Airport, Gateway, Meadowvale Business Park and Sheridan Park Corporate Centres. This recognition that the Airport Corporate Centre is indeed an Employment Area is important and should be better reflected on the City Structure Schedule.

Furthermore, Section 9.1 states "Employment Areas will support business and economic uses including manufacturing and research and development". This introductory text is in contradiction to the policy framework identified throughout Chapter 9. Of particular concern are Policies 9.1.4 and 9.1.3, which state:

*'9.1.4. Mississauga will provide for a wide range of employment activities including office and diversified employment uses. To this end Mississauga will:*

- a. *strive to increase office employment;*
- b. *encourage the establishment and support the growth of knowledge based industries, creative industries including film studios and artisans, and small innovative businesses;*
- c. *encourage the intensification of existing Employment Areas with compatible employment uses; and*
- d. *concentrate high-density employment uses such as major office and major institutional in Major Transit Station Areas and other Strategic Growth Areas.'*

The above-noted policy has incorporated refined development objectives into policy. In particular, the requirement that high-density employment uses be concentrated in certain areas of the City and that office employment be increased is concerning. In our opinion, the above-noted policy requires modification to include more flexibility and to recognize that appropriate employment-related uses and sufficient employment-related density can be provided in a number of ways. The above-noted policy is unnecessarily restrictive and will serve to hinder the ability for lands to redevelop in a contextually appropriate and desirable manner.

*'9.3.1 Industrial uses will be permitted to locate within Employment Areas, in accordance with the policies of the Plan. Character Area policies may identify sites permitting industrial uses outside of Employment Areas.'*

In accordance with the introductory text, but not policy, of Section 9.3 of the draft MOP, warehousing is characterized as being an industrial use. The characterization of warehousing as an industrial use is a deviation from the in-effect policy framework and results in employment-related policy framework refinements that are overly prescriptive and restrictive. The above-noted policy is concerning and requires modification to facilitate industrial uses within any Employment Area, including the Airport Corporate Centre. As currently drafted, the above policy would have the indirect effect of restricting industrial uses from being able to locate within certain Employment Areas of the City.

#### Chapter 10: Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, the Subject Lands are to retain their existing 'Business Employment' designation. However, the land use policy framework has been refined and serves to remove certain development permissions that are currently awarded to the Subject Lands.

As drafted, Policy 10.2.13.1 states that warehousing, distributing and wholesaling are permitted uses on designated Business Employment lands. This permission which is also present in the in-effect Mississauga Official Plan, is then removed by the draft Corporate Centre Character Areas policy framework. This permission removal and contradiction is concerning and should not be brought forward. We request that the warehousing permission as contained in the "parent" land use designation policy be maintained.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8c, the Subject Lands are identified as being located within the Tahoe Protected Major Transit Station Area (PMTSA), as being designated 'Business Employment' and as having a minimum building height permission of 2 storeys. We do not support the inclusion of the Subject Lands within the Tahoe PMTSA given the Site's locational attributes, development constraints and surrounding context. We also request that additional policy direction be provided to determine how development applications which seek a reduction to the minimum building height identified on Schedule 8c are to be evaluated. In the case of the Subject Lands, while the height permissions are appreciated, they are also unnecessarily restrictive particularly given the surrounding context and the Subject Lands development potential. The current height permissions will challenge the ability of the Site to accommodate the provision of an optimal and efficient employment-related development.

#### Chapter 15: Employment Areas

Revisions are contemplated in Chapter 15 for lands that collectively comprise the City's Employment Area lands. We highlight that consistent with Chapter 9, Chapter 15 continues to identify the Airport Corporate Centre as being an Employment Area. Furthermore, the introductory text of Section 15.1 states that Employment Areas are designated for clusters of business and economic activities including manufacturing, research and development, offices, warehousing, etc. This recognition that warehousing is an appropriate and desirable use of Employment Area lands is supported and should be integrated into the implementing policy framework. However, the intent of this introductory text is in contrast to the use permissions established by the Character Area policies. We are concerned about this contradiction and Policies 15.4.7.1 and 15.4.7.2 which state:

*'15.4.7.1. Notwithstanding the Business Employment policies of this Plan, the following uses will not be permitted in Corporate Centre Employment Areas::*

*l. warehousing, distributing and wholesaling;...'*

*'15.4.7.2. Notwithstanding the Business Employment policies of this Plan, the following additional uses will be permitted in Corporate Centre Employment Areas::*

- a. major office; and*
- b. post-secondary educational facilities.'*

The above-noted policies are concerning and are akin to a down designation of the Subject Lands. As stated throughout this Letter, the Subject Lands are currently awarded land use permissions for warehousing. This use permission is further implemented by the City of Mississauga Zoning By-law which permits this use on the Subject Lands. Elimination of warehousing as a permitted use within a recognized Employment Area is concerning, is contrary to the policy framework and development vision established for Employment Area lands throughout the draft MOP and should not be carried forward. If approved, the above-noted policies will result in situations where current zoning permissions do not implement the purpose and intent of the Official Plan. This potential situation of non-compliance can be avoided by reversing the draft policy framework. We request that Policies 15.4.7.1 and 15.4.7.2 be revised to enable an appropriate and desirable mixture of employment-related uses, including warehousing, to occur on lands across the City's various Employment Areas.

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Jim Levac, MCIP, RPP

Partner



Stephanie Matveeva, MCIP, RPP

Associate

cc. Owner  
Councillor Fonseca  
Ben Philips, Project Manager, Official Plan Review



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March 15, 2024

**Via Email to [deputations.presentations@mississauga.ca](mailto:deputations.presentations@mississauga.ca)**

Mississauga Planning and Development Committee  
c/o Planning and Building Department – 2<sup>nd</sup> Floor  
300 City Centre Drive, Mississauga, ON, L5B 3C1

**Attention: Chair and Members of Committee**

Dear Sirs/Mesdames:

**Re: March 18, 2024 Meeting of Mississauga Planning and Development Committee  
Agenda Item 6.4 – Proposed Mississauga Official Plan 2051  
File: CD.02-MIS  
Submission by Mississauga I GP Inc., Mississauga II GP Inc., and Mississauga III GP Inc.**

We are solicitors for Mississauga I GP Inc., Mississauga II GP Inc., and Mississauga III GP Inc., the owners of property in the City of Mississauga (the “City”), including the properties municipally known in the City as 86 Dundas Street East, 3009 Novar Road, and 180 Burnhamthorpe Road West which are at various stages of approval for redevelopment. We write on behalf of our clients with respect to the proposed Mississauga Official Plan 2051 (“MOP 2051”) released in February 2024. We understand the proposed MOP 2051 is available for review and comment, and that it will be considered by you at the meeting of the Planning and Development Committee (“PDC”) scheduled for March 20, 2024. Please accept this letter as our clients’ written submission to PDC for consideration.

Our clients have been reviewing MOP 2051 and the associated staff report. Based on their review completed to date, our clients have concerns with some of the policies that relate to residential unit mixes (2 bedroom and 3 bedroom requirements), inclusionary zoning, road design and streetscape standards, clarity of some of the schedules, angular planes, other matters that could potentially impact built-form and some urban design related provisions. Our clients encourage PDC to consider whether all of the proposed policies in MOP 2051 are consistent with market realities, whether transition has been appropriately considered for projects with zoning already in place, including where a project might seek out a future minor variance having advanced well through the approvals process, and if sufficient flexibility has been provided in the policies to allow them to be effectively implemented broadly. Further, our clients encourage PDC to consider if MOP 2051 practically limits intensification opportunities in the City in ways that are not ultimately desirable given the housing crisis being experienced in the City and Ontario more generally.



We appreciate the opportunity to provide these comments and thank Planning and Development Committee for its consideration. We request notice of any future meetings on this matter and notice of all decisions related to it.

Yours truly,

**Goodmans LLP**



Rodney Gill  
RJG/

cc: Clients

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP

March 15, 2024

GSAI File: 940 – 001, 940 – 005

*In Memoriam, Founding Partner:*  
**Glen Schnarr**

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE:      **Mississauga Official Plan 2051**  
           **Derry Britannia Development Limited**  
           **0 – 6500 Ninth Line, City of Mississauga**

Glen Schnarr and Associates Inc (GSAI) are the planning consultants to Derry Britannia Development Limited (the "Owner") of the lands municipally known as 0, 6136, 6168, 6252, 6278, 6288, 6314, 6400, 6432, 6500 Ninth Line, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are pleased to provide this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the west side of Ninth Line, north of Britannia Road and south of Derry Road. The Site, which is an assembly of parcels, is currently improved with a low-rise temporary Sales Office. Agricultural fields and forested areas are also present. Based on the in-effect planning policy framework, the Site is located within the Ninth Line Neighbourhood Character Area, is partially within the Britannia 407 Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Residential Medium Density' and 'Parkway Belt West' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential.

We highlight that the Subject Lands are subject to active development applications (City File Nos. 21T-M 19003, 21T-M19004, OZ 19/012 and OZ 19/013). Once implemented, the development applications will enable a vibrant, compact, pedestrian-oriented development to be introduced. This development will further support the vision established for the Ninth Line Neighbourhood Character Area and will support the creation of Ninth Line Neighbourhood as a vibrant, complete, 15-minute community. We further highlight that in December 2023, the Draft Plan of Subdivision Applications were approved and the implementing Zoning By-laws will be brought forward for City Council approval and adoption imminently. Furthermore, a City-initiated Official Plan Amendment is to be brought forward imminently which will remove the Subject Lands from the 'Parkway Belt West' designation and instead apply an appropriate land use designation. The above-noted application status is important and must be considered as the OP Review is finalized.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact development to occur. This is strengthened by the Site's locational characteristics of being adjacent to and within a comfortable walking distance of both existing street-level transit services and planned transit services, including the 407 Transitway. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Ninth Line as a vibrant, complete, 15-minute community.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

The draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 14 (Neighbourhoods) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

The draft Mississauga Official Plan continues to provide guiding policy direction for how growth and development is to be managed in accordance with a City Structure. The proposed City Structure, as presented on Schedule 1, remains largely unchanged from the in-effect Mississauga Official Plan. In the case of the Subject Lands, the proposed City Structure continues to identify the Site as being located within the Neighbourhood component of the City Structure. We support this inclusion.

We also support the proposed growth management-related policy framework, as contemplated in Chapter 3, which states that Neighbourhoods are areas of the City where lower density development, as compared to other City Structure elements, is to be located. Notwithstanding, Neighbourhood areas are also intended to be eclectic and contain a diversity of residential uses as well as compatible retail uses, services and facilities.

The draft Official Plan also introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are partially located within a Strategic Growth Area given a segment of the Site is located within the Britannia 407 Major Transit Station Area. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities as well as implement Provincial and Regional policy objectives.

Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. We highlight that the active development applications for the Subject Lands do support the intent of this policy, but request that greater flexibility be provided. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, rather than referencing housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased from the current drafted 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase "encouraged". The re-phrasing and use of the word "encourage" is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (no greater than 20%) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning and in our opinion, contrary to in-effect legislative and policy frameworks. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. The policy also does not account for the diverging widths of streets across the City. For example, there is a diverse and variable network of laneways, local roads, arterial roads and highways. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and therefore, the width of the respective street onto which a building or structure fronts. Furthermore, a limitation of building height to relate to the ROW width



will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance. Given the emergence of greater POPS across the City, this policy is outdated and requires revision.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The angular plane requirement should be removed from the above-noted policy. Appropriate transition can be demonstrated in various ways.

#### Chapter 10: Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions in comparison to existing permissions.

In the case of the Subject Lands, the proposed land use designation and Schedule 7 are concerning. Schedule 7, as contemplated, seeks to re-designate the Subject Lands from 'Residential Medium Density' to 'Residential Mid-Rise' while also maintaining the 'Parkway Belt West' designation and applying a Natural Hazards policy overlay. The re-designation to 'Residential Mid-Rise' and maintenance of the 'Parkway Belt West' designation are contrary to the approved

development vision for the Subject Lands. Furthermore, application of a Natural Hazards policy overlay is unnecessarily restrictive and contrary to the City-approved development for the Subject Lands.

By way of context, the Owner successfully obtained a Parkway Belt West Plan Amendment to facilitate redevelopment of the Subject Lands from the Ministry of Municipal Affairs and Housing in 2022. It is understood that given this Amendment, the Subject Lands are no longer subject to the Parkway Belt West Plan and a City-initiated technical Official Plan Amendment is required to recognize the development approval of the Subject Lands and to re-designate the Site to an applicable category. Application of the proposed 'Residential Mid-Rise' designation across the entirety of the Site would be concerning, would not fully recognize the presence of natural and open space areas across the development site, and does not appear to enable the provision of the approved residential built forms. Additionally, the 'Residential Mid-Rise' designation and permissions as outlined in Policy 10.2.5.8 appears to conflict with the permitted built forms identified in Section 8.6.1, Buildings and Building Types. In particular, Policy 10.2.5.8 states:

*'10.2.5.8. Lands designated Residential Mid-Rise will permit dwelling units in buildings with heights that are:*

- a. at least 5 storeys;*
- b. no greater than the width of the street right-of-way that they front onto, up to a maximum of 8 storeys; and*
- c. subject to Character Area and Special Site policies.'*

The above-noted policy is concerning and revises revision. As previously stated, we are concerned and disagree with the limitation of a built form's height based on the street ROW upon which it fronts. Furthermore, the height requirement that Residential Mid-Rise designated lands have heights of at least 5 storeys is contrary to the height-related policy directions provided in Section 8.6.1 and the Ninth Line Neighbourhood Character Area policies. This deviation must be addressed.

In Section 8.6.1 of the draft Official Plan, low-rise buildings are characterized as a variety of grade-related housing types, with heights generally not exceeding four (4) storeys. In contrast, a mid-rise building is characterized as a built form that is generally between four (4) and eight (8) storeys. Furthermore, Section 8.6.1.b) states that a mid-rise building's height should not exceed the width of the right-of-way onto which it fronts. As stated above, we are concerned with the characterization that any built form's height should be related to the ROW width onto which it fronts. We are also concerned that a mid-rise building is to have heights of no less than 4 storeys. As further demonstrated in the accompanying submission materials, the Subject Lands have been planned and designed to provide a range and mixture of built forms, including detached dwellings, semi-detached dwellings, rear lane townhouses, dual frontage townhouses, street-oriented townhouses, back-to-back townhouse dwellings and potentially two (2) mid-rise, mixed use structures. In our opinion, application of the 'Residential Mid-Rise' designation across the entirety of the Site will challenge implementation of the agreed upon and approved development vision for the Subject Lands.

In our opinion, the current, in-effect 'Residential Medium Density' designation is the most appropriate and facilitates sufficient flexibility to provide a variety and mixture of built forms across the Subject Lands. It will also enable the appropriate redevelopment of the Subject Lands. We request that the draft designations applied to the Subject Lands be revised to apply a 'Residential Medium Density' designation across the entirety of the Site.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8d, the Subject Lands are identified as being partially located within the Britannia 407 Protected Major Transit Station Area (PMTSA). Given this, the segment of the Site located within the Britannia 407 PMTSA is designated 'Parkway Belt West' and 'Residential Medium Density' and as having height permissions of 3 to 6 storeys on that segment of lands designated 'Residential Medium Density'. While we support the inclusion of the Subject Lands within the Britannia 407 PMTSA, we are concerned about the identified land use designations. We respectfully request that in accordance with our comments outlined above, the entirety of the Subject Lands be designated 'Residential Medium Density' given the Parkway Belt West Plan is no longer applicable.

#### Chapter 14: Neighbourhoods

Revisions are contemplated in Chapter 14 for lands located within the Neighbourhood component of the City Structure. In the case of the Subject Lands, the Site is located within the Ninth Line Neighbourhood Character Area and would be subject to Section 14.13, Ninth Line.

Section 14.13 presents a refined policy framework for lands within the Ninth Line Neighbourhood Character Area. We are concerned with policies 14.13.2.15, 14.13.3.9 and 14.13.3.10 as stated below.

*'14.13.2.15. A significant amount of land in the Ninth Line area is designated Parkway Belt as per the Parkway Belt West Plan. Once the alignment of the 407 Transitway is finalized, lands no longer required for the Transitway may be removed from the Parkway Belt West Plan (PBWP) through amendment to the PBWP. Once the PBWP is amended, the land use designations shown on Reference Maps (M1-M3) will come into force and effect, without further amendment to this Plan.'*

The above-noted policy is concerning and out-of-date. By way of context, the alignment of the 407 Transitway has been finalized and the lands required to implement the final alignment is known. Furthermore, the above-noted policy is contrary to evolving Provincial policy directions and in particular, the Provincial decision that the Parkway Belt West Plan is to be rescinded. Given the Parkway Belt West Plan is to be rescinded and given that the final 407 Transitway alignment is known, we request that this policy be removed.

*'14.13.3.9. Residential development within lands designated Mid-Rise will include a mix of housing forms such as townhouses and midrise apartments. Heights will range from 3 to 6 storeys, unless otherwise shown on Map 14-13.3: Ninth Line Neighbourhood Character Area Height Limits.'*

*'14.13.3.10. Notwithstanding policy 14.13.3.9 and 10.2.5.8, consideration may be given to ground related units such as semi-detached dwellings abutting Ninth Line between Doug Leavens Boulevard and Beacham Street. The overall density target for the entire Character Area must be maintained.'*

The above-noted policies are concerning. As further described throughout this Letter, there are diverging height limits identified. In our opinion, the above-noted policies require revision to enable sufficient flexibility to provide a range and mixture of built forms with varying heights. For clarity, we request that the above policies be revised and condensed to enable sufficient policy permissions to allow for a range of ground-oriented and mid-rise built forms that do not exceed the maximum height permission of 6 storeys, which is consistent with the maximum height permissions established for the Britannia 407 PMTSA lands.

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,  
**GLEN SCHNARR & ASSOCIATES INC.**



Stephanie Matveeva, MCIP, RPP  
Associate

cc. Owner  
Councillor McFadden  
Ben Phillips, Project Manager, Official Plan Review



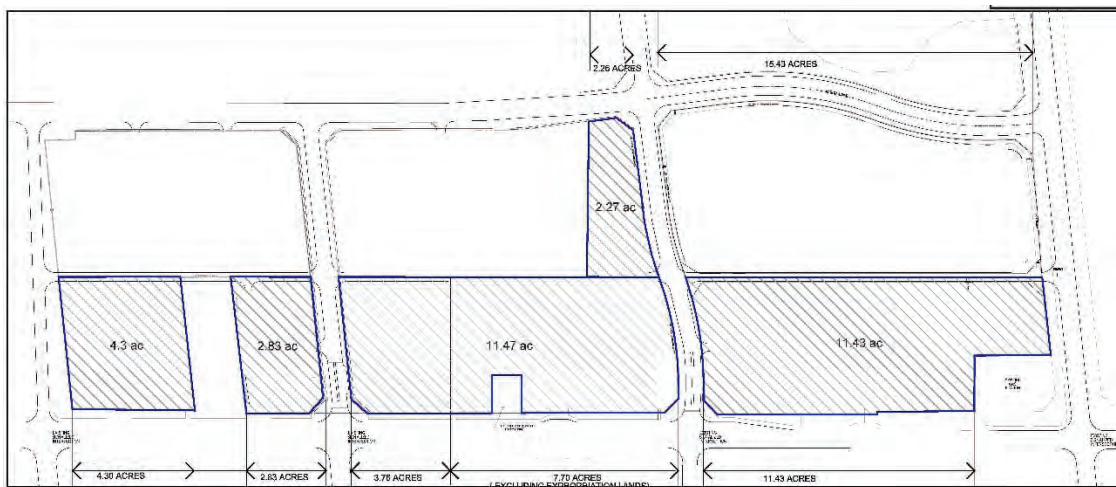
March 15, 2024

Ben Phillips, Project Manager, OP Review  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L5B 3C1

Dear Mr. Phillips;

**RE: REQUEST FOR ADDITIONAL SITE-SPECIFIC USES  
 SOUTHWEST CORNER OF DERRY ROAD AND HURONTARIO STREET, MISSISSAUGA**

Please accept this letter as a formal request to broaden the range of site-specific uses permitted under the contemplated "Office" and "Business Employment" land use designations of the Draft City of Mississauga Official Plan 2051 (the "Draft OP") for the lands located generally at the southwest corner of Derry Road and Hurontario Street in the City of Mississauga (the "Subject Lands"). The Subject Lands are shown below and encompass approximately 13.1 ha (32.3 acres) of land located along the future Hurontario LRT line, which is currently underway and represents a significant investment in transit by the Province. The Subject Lands are located within the *Derry and Courtney Park* Major Transit Station Areas (MTSA) and represent the largest consolidation of vacant land along the Hurontario LRT Line.



Subject Lands located along the Hurontario LRT Corridor identified in blue.

Given the significant changes in demand for office space resulting from the work-from-home movement caused by the Covid-19 pandemic, we believe that it is unrealistic for the Subject Lands to be developed in the near or medium term only for office and ancillary uses, as contemplated under Policy 10.2.8 of the Draft OP. Based on recent work by Colliers International, office vacancy rates in the GTA West for the 401-Hurontario Area was at 8.7% in the fourth quarter of 2023, with sublease availability at 11%. Simply put, the office market cannot fulfill the City's vision along the Hurontario



LRT Corridor. It, therefore, does not do the City, Region, nor landowner any good to implement a land use designation on the Subject Lands that will drastically reduce future redevelopment potential, especially given the limited list of permitted uses in the Draft OP.

We, therefore, believe that a broadening of the uses permitted on the Subject Lands is appropriate. To this extent, we suggest that the Subject Lands be redesignated to Mixed Use Limited for lands within the NEF-35 Contour Limits and Mixed Use outside of the NEF-35 Contour Limits in order to provide maximum flexibility to the redevelopment of the Subject Lands in an effort to efficiently utilize the lands and optimize the transit infrastructure investment of the Hurontario LRT.

The above-noted mix of uses would provide significant employment and housing opportunities, which would not only support the significant infrastructure investments made by the Province, Region and City for the LRT, but also help alleviate the housing crisis the City is currently facing. Specifically, permissions for Residential uses would be contemplated for those lands within the Subject Lands that do not fall within the  $\geq 35$  NEF zones identified in the 1996 NEP/2000 NEF Composite Noise Contours. Although we understand the City's intention to establish uniformity of land uses along the Hurontario Street corridor (specifically Office uses between Highway 407 to the north and Highway 401 to the south), we believe that this will drastically reduce redevelopment potential in an area that is optimal for economically viable land use permissions, such as those listed above.

At a minimum, should Council not agree to the above requested redesignation, we request that the following uses should be permitted on a site-specific basis, in addition to the existing uses identified under the Office and Business Employment land use designations, to encourage substantial development occurring where it has been stagnant due to restrictions imposed by the City:

- Residential, in conjunction with other permitted uses;
- Retail store;
- Financial institution;
- Restaurant;
- Self Storage Facility; and,
- Warehousing, distributing and wholesaling.

Lastly, we request that the minimum storey limit be reduced to allow further flexibility in site design and tenancing of the Subject Lands.

In conclusion, we encourage City staff to consider our request such that redevelopment of the Subject Lands can advance expeditiously to support the Hurontario LRT and to provide a broader range of commercial uses and much needed housing within two MTSA's in the City of Mississauga.

We would be pleased to discuss this matter further with you at your convenience.

Yours truly,

SmartCentres Real Estate Investment Trust

cc. David McKay, MHBC

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

March 15, 2024

GSAI File: 054-006

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE:      **Mississauga Official Plan 2051**  
             **Eight Acres Limited**  
             **2434 – 2490 Shepard Avenue, City of Mississauga**

Glen Schnarr and Associates Inc (GSAI) are the planning consultants to Eight Acres Limited (the "Owner") of the lands municipally known as 2434, 2442, 2466, 2472, 2480, 2484, 2486, 2490 Shepard Avenue, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated June 23, 2023 and July 31, 2023, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the west side of Shepard Avenue, north of Paisley Boulevard East. The Site, which is an assembly of parcels, is currently improved with eight (8) detached dwellings and a selection of accessory, detached structures. Forested areas are also present. Based on the in-effect planning policy framework, the Site is located within the Downtown Hospital Character Area, within the Downtown Mississauga Urban Growth Centre, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the Queensway Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Residential High Density' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being within 300 metres of the Hazel McCallion Light Rail Transit ('LRT') network and various street-level transit services. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Downtown Hospital as a vibrant, complete, 15-minute community.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

The draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 12 (Urban Growth Centre), 16 (Special Sites) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

In accordance with the in-effect Provincial and Regional policy frameworks, the Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area. We support the identification and policy directions identified for Strategic Growth Areas., which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, thereby removing reference to housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased from the current drafted 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase "encouraged". The re-phrasing and use of the word "encourage" is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (20% or less) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

'5.2.5. *The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary

Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ("ROW") on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. In our opinion, the angular plane requirement should be removed from the above-noted policy.



#### Chapter 10: Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions in comparison to existing permissions.

In the case of the Subject Lands, the proposed re-designation from 'Residential High Density' to 'Residential Low Rise II' is troubling. Furthermore, the proposed 'Residential Low Rise II' designation identified on Schedule 7 is inconsistent and conflicts with the 'Residential High Density' designation identified for the Site on Schedule 8I. Given that the Site is located within a Strategic Growth Area, is within the Urban Growth Centre, and is within a Protected Major Transit Station Area, the Site's designation requires re-evaluation. In our opinion, the 'Residential High Density' designation is the most appropriate and should be recognized. This designation would also further implement the City's evolving built form-based height permissions.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8I, the Subject Lands are identified as being located within the Queensway Protected Major Transit Station Area (PMTSA), as being designated 'Residential High Density' and as having a maximum building height permission of 3 to 8 storeys. We support the inclusion of the Subject Lands within the Queensway PMTSA given the Site's locational attributes. However, we request that additional policy direction be provided to determine how development applications which seek building heights above and beyond those established by the MTSA Schedule are to be evaluated. In the case of the Subject Lands, while the height permissions are appreciated, they are also unnecessarily restrictive particularly given lands immediately west have much greater height permissions. The current height permissions will challenge the ability of the Site to accommodate the provision of a high-quality, refined, efficient, compact, mixed-use development that supports the Provincial and Regional objectives for MTSA lands.

#### Chapter 12: Urban Growth Centre:

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. In accordance with Chapter 12 as drafted, the Subject Lands are located within the Urban Growth Centre and the Hospital Character Area of the Urban Growth Centre.

Section 12.1.2 provides a series of urban design policies that are to apply across all lands in the Fairview, Cooksville and Hospital Urban Growth Centre Character Areas. Of concern is Map 12-1.2 which identifies a series of future pedestrian connection and public park locations across this area of the City. While we support the desire for appropriately placed parks or publicly accessible open spaces, as well as mid-block pedestrian connections, our concern is there is implementing policy to award flexibility in the final location of the parks, open spaces or pedestrian connections. Furthermore and in the case of the Subject Lands, a pedestrian connection is desired in two locations, along the northern and southern property lines. Should these connections be required, which are identified as to be unencumbered, 20 metre pathway cross-sections in the Council adopted Downtown Fairview, Cooksville and Hospital Built Form Standards, this would bisect the Site and adversely impact the development potential of the lands. We request that clarity, in the form of new implementation policy, be provided that the location and mechanism to secure these desired pedestrian connections be determined on a site-by-site basis and through the technical evaluation of a development application.

Sections 12.3 and 12.6 present a refined policy framework for lands within the Hospital Urban Growth Centre Character Area. We are concerned with the refined policy framework and in particular, Policies 12.3.2.1 and 12.5.4.2.

- '12.3.2.1. New buildings will achieve a high quality urban design and built form, and will be designed and located to:*
- a. create a transition in height generally consistent with a 45 degree angular plane that is measured from the property line adjacent to Residential Low Rise I and II land use designations;*
  - b. generally maintain a minimum separation distance of 30 metres between portions of buildings that are greater than six storeys;*
  - c. add visual interest by varying the massing of buildings; and*
  - d. promote visibility and interest from the street through the use of high quality materials and architectural detailing in the design of podium.'*

The above-noted policy has incorporated urban design-related objectives into policy. In particular, the requirement that a 45 degree angular plane be respected when lands are adjacent to designated Residential Low Density I and II lands as well as the policy requirement that a 30 metre tower separation distance be provided. The inclusion of these urban design objectives into policy is concerning. In our opinion, the above-noted policy requires modification to include more flexibility and to recognize that appropriate transitions can be provided in a number of ways. The above-noted policy is unnecessarily restrictive and will serve to hinder the ability for lands to redevelop in support of the development vision for the Hospital Urban Growth Centre Character Area.

Similarly, we are concerned with the revised Hospital Urban Growth Centre Character Area policy framework as presented in Section 12.6. Our concerns with these policies, which appear to be a repetition of the policies enacted by City Council following the 2022 Downtown Fairview, Cooksville and Hospital Policy Review, have been previously noted in our earlier comment letters. We remain concerned with the evolving policy framework for lands within the Hospital Urban Growth Centre area of the City. Of particular concern is Policy 12.6.3 which states:

- '12.6.3.2.. On lands designated Residential High-Rise and Mixed Use, the maximum permitted building height as shown on Schedule 8: Protected Major Transit Station Area (Schedule 8I) may be exceeded by up to three storeys without an amendment to this Plan, subject to meeting the*

*building transition policies of this Plan, where a development provided additional non-residential uses, including community infrastructure. One additional storey in building height may be permitted for every 900 square metres of non-residential gross floor area (GFA) provided above the first storey. This does not include amenity space, above grade parking or ground floor non-residential uses, where required by the policies of this Plan.'*

As stated above, we are concerned with the identified maximum building height permission contemplated. While we appreciate the above-noted policy enables additional permitted height without requiring an Amendment, we are concerned with the assertion that additional height can be provided in exchange for a specified amount of additional non-residential areas, above the ground floor. In our opinion, the policy as drafted does not adequately accommodate the evolving context of the community nor changing market trends. The requirement to provide additional non-residential uses and area above the ground level does not adequately accommodate a developer's ability to right-size the non-residential areas to be provided and facilitate an optimal site design. We continue to request that the policy be modified to enable additional height to be permitted, subject to differing evaluation criteria.

#### Chapter 16: Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 16 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area policies. Of relevance to the Subject Lands, the Site is identified as being located within and subject to Special Site 117 (Downtown Hospital – UGC) and policies 16.117.1 and 16.117.2. Policy 16.117.2 continues to require that prior a development application proceeding, additional study is required to clarify a two-zone floodplain management concept. We support the continuation of this policy given the site-specific characteristics of the Subject Lands.

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP  
Managing Partner



Stephanie Matveeva, MCIP, RPP

Associate

cc. Owner  
Councillor Damerla  
Ben Philips, Project Manager, Official Plan Review

## Mississauga Official Plan 2051 - Comment Matrix

Date	Organization/Entity/Department	Name	Chapter/Section/Policy	Comment/Question	Mississauga - Staff Response
March 4/24	CVC	D. Di Berto	4.3.15.g	It appears as though this policy is leading into offsetting although it is unclear. Suggest making offsetting the intent of this policy and revising to be more explicit by staying that development within the NHS is discouraged but should it occur, then offsetting is expected.	
March 4/24	CVC	D. Di Berto	4.3.1.6	CVC staff support this policy and further recommend that no new lot creation is permitted within Natural Hazard Lands as well and that this is explicitly stated to avoid future proposed development scenarios where this can occur.	
March 4/24	CVC	D. Di Berto	4.3.1.7	Suggest including wetlands as well, not only PSW/coastal wetlands.	
				CVC staff caution the City in this policy as the PPS prohibits development within PSWs. Although trails have been placed within PSWs, they are in the form of a boardwalk with very minimal impact and intrusion. Suggest removing the term trail and/or replacing with boardwalk.	
March 4/24	CVC	D. Di Berto	4.3.3.24	Suggest adding that safe access must be available to sites that development is proposed for.	

March 19/24	CVC		D. Di Berto	4.2.12	<p>This is a good opportunity to speak to offsetting losses incurred by the City themselves through infrastructure projects. Consider adding in a clause that requires compensation for unavoidable losses when on City-owned land. Also, this section speaks to planting however also suggest adding wording that discourages tree removal but promotes offsetting as applicable.</p>	
March 19/24	CVC		D. Di Berto	4.3 Diagram	<p>The diagram is confusing. What is meant by untreated valleyslands, etc? Also, watercourses should be included within the hazard sphere if this diagram is to be used.</p>	
March 19/24	CVC		D. Di Berto	4.3.1.5	<p>There is an opportunity here to promote a Woodland and Wetland Management Plan when applicable, for lands deeded to the City as part of the NHS.</p>	
March 19/24	CVC		D. Di Berto	4.3.1.29	<p>Where the residential woodland also forms part of the natural hazard regulated by the CA, the CA's offsetting requirements may exceed the requirements determined by the City.</p>	
March 19/24	CVC		D. Di Berto	4.3.3.	<p>Consider including wetlands and unstable soils as natural hazards as well (consistent with CA Act requirements).</p>	
March 19/24	CVC		D. Di Berto	4.3.3.11	<p>This is the first time ESC requirements are introduced. Suggest adding this policy in earlier sections related to protection of natural hazards and features.</p>	



March 19/24	CVC	D. Di Berto	4.3.3.15	It is unclear as to what this policy means and what the intent is. If the direction is to ensure development is located outside of a hazard associated with a watercourse this should be more clearly stated (i.e. development should not occur within a watercourse and its associated hazards (flooding, erosion, unstable soil etc.). Suggest revising to clearly state the intent.	
March 19/24	CVC	D. Di Berto	4.3.3.16	Note that typically development in proximity to a watercourse will likely be regulated by the CA and as such reference to approval from the CA should also be included.	
3-Apr-24	CH	H.Dearlove	Figure 4.3: Green Systems, pg 4-6	This figure should be updated to include all the Natural Hazards Lands components included within the Natural Hazard Definition (i.e., River and streams).	
3-Apr-24	CH	H.Dearlove	Figure 4.3: Green Systems, pg 4-6	Recommend clarifying the meaning of "untreated wetland" as it is not included in the Glossary.	
3-Apr-24	CH	H.Dearlove	Policy 4.3.4, pg 4-7	CH recommends adding reference to "Natural Hazards" in addition to Natural Heritage Systems.	

3-Apr-24	CH		H.Dearlove	Policy 4.3.8, pg 4-8	<p>Natural Hazards are not included in this policy referencing buffer widths. Under Ontario Regulation 41/24, CA's regulate all watercourses, valleylands, wetlands, Lake Ontario Shoreline, hazardous lands and unstable soil and bedrock, as well as lands adjacent to these features. CA's regulate 15 metres from the greatest hazard associated with a watercourse (floodplain or erosion hazards), 30 metres from the limit of any wetland and 15 metres from the greatest hazard associated with the Lake Ontario shoreline. This policy should be updated to reflect CA requirements.</p>	
3-Apr-24	CH		H.Dearlove	Policy 4.3.1.3, pg 4-10	<p>As the Natural Heritage System includes Natural Hazards regulated by CA's, it should be noted that any refinements to Natural Hazards should be in "Consultation with the appropriate CA".</p>	
3-Apr-24	CH		H.Dearlove	Policy 4.3.1.6, pg 4-11	<p>To ensure consistent with the PPS a policy should be added to indicated that lot creation should not be permitted within Natural Hazard Lands.</p>	
3-Apr-24	CH		H.Dearlove	Policy 4.3.1.7, pg 4-11	<p>CH recommends updating this policy to include that development and site alteration activities will also not be permitted within 'other wetlands' and areas regulated by a CA without prior approval.</p>	
3-Apr-24	CH		H.Dearlove	Policy 4.3.1.8, pg 4-11	<p>This policy should be updated to include 'other wetlands' in the list of features.</p>	6.5

3-Apr-24	CH		H.Dearlove	Policy 4.3.3, pg 4-17	Recommend that the general wording provided at the beginning of this section include reference to 'unstable slopes, soils and bedrock'.	
3-Apr-24	CH		H.Dearlove	Policy 4.3.3.11, pg 4-19	The requirement for a 'Erosion and Sediment Control Study' has not been included in any of the other policies referencing 'development and site alteration'. If appropriate, the additional Policies should be updated to include a requirement for a 'Erosion and Sediment Control Study'.	
3-Apr-24	CH		H.Dearlove	Policy 4.3.3.14, pg 4-20	Recommend adding a note to this policy that studies/assessments should be to the satisfaction of the City and the appropriate CA.	
3-Apr-24	CH		H.Dearlove	Policy 4.3.3.15, pg 4-20	The term "erosion rehabilitation study" is not defined within the glossary and clarity should be provided as to the requirements of this type of study.	
3-Apr-24	CH		H.Dearlove	Policy 4.3.3.21, pg 4-21	CH recommends this policy be updated to reflect that any development and site alteration on lands subject to flooding should be in consultation with the appropriate CA and may require approval by the CA.	
3-Apr-24	CH		H.Dearlove	Glossary	CH recommends including the following terms be added to the Glossary to provide clarity to the Official Plan text: a) Essential Infrastructure b) Natural Heritage c) Special Management Areas and residential Woodlands System	

3-Apr-24	CH		H.Dearlove	10.2.3.8, Greenlands, pg. 10-5	CH staff continues to recommend the following be added to this policy "Development in regulated areas is subject to approvals by the appropriate conservation authority."	
					CH supports the existing policy, specifically the "will be subject to" language. CH continues to recommend the Ninth Line Policies be updated as follows: a. The Ninth Line Neighbourhood includes lands designated for development that are currently affected by regulatory flooding and erosion hazards, and/or that contain wetlands.	
3-Apr-24	CH		H.Dearlove	14.13, Ninth Line Policies, Neighbourhoods pg. 14-32	<p>b. The limits of existing watercourses, flooding and erosion hazards, and wetlands are anticipated to be altered in some areas in accordance with the Ninth Line Lands Scoped Subwatershed Study (SWS) and 407 Transitway (West of Brant Street to West of Hurontario Street) Environmental Assessment (EA; October 2020). As per the Scoped SWS, Comprehensive Environmental Impacts and Integration Studies (CEIISs) are required in support of development applications in this area. CEIISs will fully evaluate and confirm the Natural Heritage System (NHS) feature and hazard limits, buffers and management strategies in order to confirm the limits of the NHS, stormwater management and development blocks.</p>	
3-Apr-24	CH		H.Dearlove	14.13, Ninth Line Policies, Neighbourhoods pg. 14-32		

3-Apr-24	CH		H.Dearlove	Glossary: Valley and Stream Corridors	CH staff continues to recommend using language consistent with the Provincial Policy Statement and/or the Conservation Authorities (CA) Act, which references rivers, creeks, streams and watercourses, and refers to “river or stream valleys” .	
					a. Recommend the Natural System include all CH regulated lands, including watercourses, flooding and erosion (meander belt and stable top of bank) hazards, and 15m allowances from the greater of those hazards. In addition, staff recommends it include wetlands and associated regulated areas (i.e., 30 m limits of feature).	
3-Apr-24	CH		H.Dearlove	Schedule 2 – Natural Systems	Ensure natural hazard and wetland layers reflect best available information. CH can be contacted to obtain current mapping layers. If not already incorporated, the regulated limits along Ninth Line should be based on the limits from the SWS. It should be noted that feature and hazard limits are preliminary and subject to change based on further studies that will be prepared in support of development and the Transitway along Ninth Line	
3-Apr-24	CH		H.Dearlove	Schedule 2 – Natural Systems		
						6.5





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April 3, 2024

Amina Menkad  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

**BY E-MAIL ONLY (Amina.Menkad@mississauga.ca)**

To Amina Menkad:

**Re: City of Mississauga Official Plan 2051 – DRAFT  
CH File Number: AMPR-314**

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CH has reviewed the Draft City of Mississauga Official Plan as per our regulatory responsibilities under the *Conservation Authorities Act* (CA Act) and Ontario Regulation 41/24 and our provincially delegated responsibilities under Ontario Regulation 686/21 (e.g., acting on behalf of the province to ensure that decisions under the *Planning Act* are consistent with the natural hazards policies of the Provincial Policy Statement [PPS, Sections 3.1.1-3.1.7] and/or provincial plans).

CH staff appreciates the opportunity to provide feedback on the draft policies and has provided comments in Appendix A of this letter for your consideration. Please contact the undersigned with any questions.

Sincerely,

Heather Dearlove, B.Sc.  
Environmental Planner  
905.336.1158 ext. 2231  
[hdearlove@hrca.on.ca](mailto:hdearlove@hrca.on.ca)

Cc:

Encl: **Appendix A: Detailed Comments**

### Appendix A: Detailed Comments

#	Section, Page	Current Proposed Policy	Conservation Halton (CH) Comment
1.	Figure 4.3: Green Systems, pg 4-6		<p>a) This figure should be updated to include all the Natural Hazards Lands components included within the Natural Hazard Definition (i.e., River and streams).</p> <p>b) Recommend clarifying the meaning of “untreated wetland” as it is not included in the Glossary.</p>
2.	Policy 4.3.4, pg 4-7	The City will work with the conservation authorities to encourage the protection, restoration, enhancement, stewardship and management of lands within the conservation authorities’ natural heritage systems.	CH recommends adding reference to “Natural Hazards” in addition to Natural Heritage Systems.
3.	Policy 4.3.8, pg 4-8	Generally, buffer widths will be at least 10 metres from the limits of the natural heritage features and at least 30 metres from the limits of a Provincially <i>Significant Wetland</i> .	Natural Hazards are not included in this policy referencing buffer widths. Under Ontario Regulation 41/24, CA’s regulate all watercourses, valleylands, wetlands, Lake Ontario Shoreline, hazardous lands and unstable soil and bedrock, as well as lands adjacent to these features. CA’s regulate 15 metres from the greatest hazard associated with a watercourse (floodplain or erosion hazards), 30 metres from the limit of any wetland and 15 metres from the greatest hazard associated with the Lake Ontario shoreline. This policy should be updated to reflect CA requirements.
4.	Policy 4.3.1.3, pg 4-10	The exact limit of components of the Natural Heritage System will be determined through site specific studies such as an <i>Environmental Impact Study</i> .	As the Natural Heritage System includes Natural Hazards regulated by CA’s, it should be noted that any refinements to Natural Hazards should be in “Consultation with the appropriate CA”.
5.	Policy 4.3.1.6, pg 4-11	The City will not support new lots created by land division or units or parcels of tied land (POTLs)	To ensure consistent with the PPS a policy should be added to indicated that lot creation

#	Section, Page	Current Proposed Policy	Conservation Halton (CH) Comment
		created by condominium that will have the effect of extending into or fragmenting the ownership of Significant Natural Areas, <i>Natural Green Spaces</i> , Residential Woodlands and buffers, in the absence of a supporting <i>Environmental Impact Study</i> to the satisfaction of the City.	should not be permitted within Natural Hazard Lands.
6.	Policy 4.3.1.7, pg 4-11	Notwithstanding the policies of this Plan, <i>development and site alteration</i> will not be permitted in the following areas: a. provincially <i>significant wetlands</i> or Provincially <i>significant coastal wetlands</i> ; b. <i>habitat of endangered species and threatened species</i> , except in accordance with Provincial and Federal requirements; c. <i>fish habitat</i> , except in accordance with Provincial and Federal requirements; and d. Core Areas of the Greenlands System as defined in the Region of Peel Official Plan, except in accordance with Regional requirements.	CH recommends updating this policy to include that development and site alteration activities will also not be permitted within 'other wetlands' and areas regulated by a CA without prior approval.
7.	Policy 4.3.1.8, pg 4-11	<i>Development and site alteration</i> on lands adjacent to a Provincially <i>significant wetland</i> , Provincially <i>significant coastal wetland</i> and <i>habitat of endangered species and threatened species</i> or other <i>Significant Natural Area</i> will require an <i>Environmental Impact Study</i> , demonstrating no <i>negative impact</i> to the natural heritage features or on their <i>ecological function</i> , to the satisfaction of the City and the appropriate conservation authority.	This policy should be updated to include 'other wetlands' in the list of features.
8.	Policy 4.3.3, pg 4-17	Natural Hazard Lands are generally associated with valley and stream corridors and the Lake Ontario shoreline. These areas tend to be unsafe for <i>development</i> due to naturally occurring processes such as flooding and erosion, which	Recommend that the general wording provided at the beginning of this section include reference to 'unstable slopes, soils and bedrock'.

#	Section, Page	Current Proposed Policy	Conservation Halton (CH) Comment
		<p>have been significantly accelerated by climate change. <i>Significant valleylands</i> and the valley and watercourses are also Significant Natural Areas and form part of the city's Natural Heritage System. Watercourse corridors and the Lake Ontario shoreline, including the physical hazards associated with these areas, are critical to the Natural Heritage System due to the <i>ecological functions</i>, including linkage function, that they provide. Of particular concern within valley and watercourse corridors is the preservation and enhancement of <i>fish habitat</i> as an indicator of a healthy environment and for leisure activity and tourism. Lands in southern Mississauga serve an important <i>ecological function</i>.</p>	
9.	Policy 4.3.3.11, pg 4-19	<p>An Erosion and Sediment Control Study may be required for <i>development</i> and <i>site alteration</i>, where appropriate.</p>	<p>The requirement for a 'Erosion and Sediment Control Study' has not been included in any of the other policies referencing 'development and site alteration'. If appropriate, the additional Policies should be updated to include a requirement for a 'Erosion and Sediment Control Study'.</p>
10.	Policy 4.3.3.14, pg 4-20	<p><i>Development</i> adjacent to valleyland and <i>watercourse</i> features may be required to be supported by detailed slope stability and stream erosion studies and assessments that define natural hazard limits, where appropriate.</p>	<p>Recommend adding a note to this policy that studies/assessments should be to the satisfaction of the City and the appropriate CA.</p>
11.	Policy 4.3.3.15, pg 4-20	<p><i>Development</i> on lands containing a <i>watercourse</i> system will be subject to the recommendations of the applicable erosion rehabilitation study where one has been established for that <i>watershed</i>. Where no such recommendations or study are in place, it will be demonstrated by the proponents of <i>development</i> that the <i>watercourse</i> is stable,</p>	<p>The term "erosion rehabilitation study" is not defined within the glossary and clarity should be provided as to the requirements of this type of study.</p>

#	Section, Page	Current Proposed Policy	Conservation Halton (CH) Comment
		either with or without the installation of erosion protection works, to the satisfaction of the City and the appropriate conservation authority.	
12.	Policy 4.3.3.21, pg 4-21	4.3.3.21 <i>Development and site alteration</i> is generally prohibited on lands subject to flooding.	CH recommends this policy be updated to reflect that any development and site alteration on lands subject to flooding should be in consultation with the appropriate CA and may require approval by the CA.
13.	Glossary		CH recommends including the following terms be added to the Glossary to provide clarity to the Official Plan text: a) Essential Infrastructure b) Natural Heritage System c) Special Management Areas and residential Woodlands
14.	Glossary		The definition of Natural Hazard Lands should be updated to include 'unstable soil and bedrock' to be consistent with the CA's definition of Hazardous Lands (ie. Hazardous site under the PPS).
<b>Previous CH Comments – July 7, 2023 (Emma DeFields)</b>			
15.	10.2.3.8, Greenlands, pg. 10-5	For existing lots of record, <i>development</i> will not be permitted to extend within the regulatory storm <i>flood plain</i> or hazard lands associated with a valley and watercourse corridor if there are lands suitable for <i>dev2.3.8elopment</i> on the property beyond the hazard lands.	CH staff continues to recommend the following be added to this policy "Development in regulated areas is subject to approvals by the appropriate conservation authority."
16.	14.13, Ninth Line Policies, Neighbourhoods pg. 14-32	All <i>development</i> within the Ninth Line Neighbourhood Character Area will be subject to the Ninth Line Sixteen Mile Creek Scoped Subwatershed Study. The <i>development</i> of lands south of the woodlot (near Erin Centre Boulevard)	CH supports the existing policy, specifically the "will be subject to" language. CH continues to recommend the Ninth Line Policies be updated as follows:



#	Section, Page	Current Proposed Policy	Conservation Halton (CH) Comment
		will also be in accordance with the Sawmill Creek Subwatershed Plan.	<p>a. The Ninth Line Neighbourhood includes lands designated for development that are currently affected by regulatory flooding and erosion hazards, and/or that contain wetlands.</p> <p>b. The limits of existing watercourses, flooding and erosion hazards, and wetlands are anticipated to be altered in some areas in accordance with the <i>Ninth Line Lands Scoped Subwatershed Study (SWS)</i> and <i>407 Transitway (West of Brant Street to West of Hurontario Street) Environmental Assessment (EA; October 2020)</i>. As per the Scoped SWS, Comprehensive Environmental Impacts and Integration Studies (CEIISs) are required in support of development applications in this area. CEIISs will fully evaluate and confirm the Natural Heritage System (NHS) feature and hazard limits, buffers and management strategies in order to confirm the limits of the NHS, stormwater management and development blocks.</p>
17.	Glossary: Valley and Stream Corridors	Valley and stream corridors are the natural resources associated with the river systems characterized by their landform, features, and functions, and include associated ravines. Valley corridors and ravines are distinguished from stream corridors by the presence of a distinct land form.	CH staff continues to recommend using language consistent with the Provincial Policy Statement and/or the Conservation Authorities (CA) Act, which references rivers, creeks, streams and watercourses, and refers to “river or stream valleys”.
18.	Schedule 2 – Natural Systems		<p>a. Recommend the Natural System include all CH regulated lands, including watercourses, flooding and erosion (meander belt and stable top of bank) hazards, and 15m allowances from the greater of those</p>

#	Section, Page	Current Proposed Policy	Conservation Halton (CH) Comment
			<p>hazards. In addition, staff recommends it include wetlands and associated regulated areas (i.e., 30 m limits of feature).</p> <p>b. Ensure natural hazard and wetland layers reflect best available information. CH can be contacted to obtain current mapping layers. If not already incorporated, the regulated limits along Ninth Line should be based on the limits from the SWS. It should be noted that feature and hazard limits are preliminary and subject to change based on further studies that will be prepared in support of development and the Transitway along Ninth Line.</p>

**From:** [Ben Phillips](#)  
**To:** [Amina Menkad](#); [Courtney Plato](#)  
**Subject:** FW: CN Rail Comments: Mississauga Official Plan Review  
**Date:** Monday, March 18, 2024 3:26:00 PM  
**Importance:** High

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**From:** Greatrex, Porter <Porter.Greatrex@wsp.com>  
**Sent:** Monday, March 18, 2024 9:29 AM  
**To:** Official Plan <Official.Plan@mississauga.ca>; Ben Phillips <Ben.Phillips@mississauga.ca>; City Clerk (External) <City.Clerk@mississauga.ca>  
**Cc:** Proximity <proximity@cn.ca>; John-Baptiste, Chad <Chad.John-Baptiste@wsp.com>  
**Subject:** [EXTERNAL] CN Rail Comments: Mississauga Official Plan Review  
**Importance:** High

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To whom it may concern,

WSP Canada Inc. has been retained and is acting on behalf of CN Rail and is pleased to have this opportunity to provide comments on the Mississauga Official Plan Review. It is our position that the City of Mississauga needs to incorporate policies that reflect the 2020 PPS and provide further direction in the Official Plan. CN operates three freight rail yards that are an important component of the overall freight rail network in Canada. As such, any policies relating to developments adjacent or in proximity to rail rights-of-way and the freight rail yard in the Mississauga Official Plan are requested to incorporate reference to CN Rail's infrastructure.

CN Rail intends to submit a full-length comment letter in the near future but wanted to ensure this correspondence was delivered before the Statutory Public Meeting today (March 18, 2024).

The Draft Official Plan includes some strong policies revolving around Rail Noise, Safety, and Vibration (S.4.13). Where we feel there is a need to modify the Draft Official Plan is with respect to some of the land use compatibility policies. For example, Section 4.8.2 states that sensitive land uses may be permitted next to existing major facilities if they can be mitigated. This is problematic and, in our opinion, it also fails to not follow the current mandate in section 1.2.6.1 of the Provincial Policy Statement 2020 (PPS) concerning land use compatibility which states:

*Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures."*

Similarly, the land use compatibility plans fail to reference policy 1.2.6.2 of the PPS which goes on to list the exceptions that proposed uses need to meet in order to be permitted (we refer to this as the avoidance test):

*“Where avoidance is not possible in accordance with policy 1.2.6.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:*

- a. there is an identified need for the proposed use;*
- b. alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;*
- c. adverse effects to the proposed sensitive land use are minimized and mitigated; and*
- d. potential impacts to industrial, manufacturing or other uses are minimized and mitigated”*

Furthermore, we have noticed other aspects of the Official Plan worth commenting on (further land use compatibility policies, major facilities being identified on a schedule, definitions to be included, approach to Class 4 for federal facilities) and will expand on these in our follow-up comment letter.

We would like to thank you again for the opportunity to participate in the Official Plan Review. We look forward to continuing to work with the City of Mississauga throughout this process to ensure that this important industry is protected in the land use framework in Ontario. Please forward all future documents to [proximity@cn.ca](mailto:proximity@cn.ca), [Chad.John-Baptiste@wsp.com](mailto:Chad.John-Baptiste@wsp.com), and the undersigned. In addition, we also request to be copied on any further public notices and notices of decisions with respect to this matter.

Regards,

Porter



**Porter Greatrex**

Planner, Urban and Community Planning  
Planning, Transportation & Infrastructure  
He/Him

T : +1 647-227-5322

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18 March 2024

Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga ON L5B 3C1

Attention: Amina Menkad, Project Lead, Official Plan Review  
 Ben Phillips, Project Manager, Official Plan Review

RE: Proposed Mississauga Official Plan 2051  
 Edenshaw Developments Limited

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Dear A. Menkad and B. Phillips:

Sajecki Planning hereby submits this letter to the City of Mississauga (the City) on behalf of Edenshaw Developments Limited (Edenshaw) in relation to the City's ongoing Official Plan Review (OPR).

Edenshaw would like to express their support for the City's endeavour to increase housing opportunities across Mississauga and applauds the City's consideration of previously submitted comments on Policy Bundle 3, which were submitted by Davies Howe (attached to this letter) and others. However, Edenshaw would like to take this opportunity to provide the following supplementary comments on the Draft Mississauga Official Plan 2051 (Draft Official Plan).

*Opportunities for Context-Sensitive Development*

Although we understand the importance of balancing flexibility with certainty in identifying height and density permissions in municipal policy, the Draft Official Plan removes key policies that support context-specific development. Policies 13.1.1.3, 14.1.1.3, and 16.1.1.2 in the in-force Official Plan identify criteria against which development applications are evaluated where proposed heights exceed those contemplated for Major Nodes, Community Nodes, and Neighbourhoods, respectively. These criteria recognize that site conditions vary across a City Structure element, and that some sites may be appropriate for a greater intensity than is contemplated elsewhere. By identifying additional criteria for review, the potential impacts of this additional density are mitigated. This allows the City to capitalize on unique site and area conditions to support the development of much-needed housing. Recognizing that height permissions are proposed to follow land use designations, subject to Character Area or Special Site provisions, the proposed removal of these policies reduces opportunities for context-specific and context-sensitive development. The introduction of Policy 17.4.5, which requires all transitions in height and built form to be achieved within the height ranges established by the Plan, similarly eliminates consideration for proximity and edge conditions by treating all lands within a land use designation or Character Area the same.

Recommendation: Staff consider reintroducing policies permitting heights different than those established in Character Area policies subject to outcome-based criteria, such as consideration for the planned context (including transition to neighbouring Character Areas).

#### *Port Credit Local Area Plan*

Although the Draft Official Plan includes revised language within the Port Credit Local Area Plan (PCLAP), such changes are largely intended to eliminate redundant policies and ensure consistency with other policy changes made elsewhere in the Draft Official Plan. The majority of policies relating to height and density within the PCLAP remain substantially unchanged. The PCLAP came into effect in 2014, prior to the approval of the Hazel McCallion LRT corridor, and has not been significantly updated since. Building heights illustrated in Maps 2A, 2B, and 2C do not reflect existing conditions or recent settlements on development applications in the area. They also do not adequately reflect existing and emerging conditions regarding tower separation distances and do not respond to existing and planned transit infrastructure, or real estate and market conditions.

The introductory language to the Community Node Character Area policies states that, “the [Port Credit] Community Node has the potential to reach the targeted density of 200 residents and jobs combined per hectare for the Port Credit Protected Major Transit Station Area.” This is inconsistent with the Region of Peel Official Plan’s minimum density requirement of 200 residents and jobs combined per hectare for the area. Policies in the PCLAP effectively limit new development to heights no taller than the prevailing built form within the area, in some cases identifying permitted building heights lower than the existing built form. These overly prescriptive policies prevent context-sensitive development from occurring, development that can respect the existing character of Port Credit while contributing to incremental growth and housing development consistent with provincial, regional, and municipal policy direction.

Recommendation: Staff update PCLAP policies and maps to reflect existing and approved heights and, more generally, the trend towards greater heights in the Port Credit area, as reflected in Ontario Land Tribunal settlements. This should include revised introductory language to the Community Node Character Area identifying the noted density of 200 residents and jobs combined per hectare as a minimum density, consistent with the Peel Regional Official Plan.

#### *Urban Design Policies*

The intent of urban design policies is to help guide the design of new development. Similar to height and density policies discussed above, if not more so, urban design policies must balance a level of specificity that provides clarity as to the City’s expectations while remaining flexible in how specific objectives are met. New policies in the Draft Official Plan have been proposed speaking to the need for ‘appropriate transitions’ in height (8.5.2.2.h., 8.5.2.5, 8.5.2.7); however, there is little guidance regarding the intent of these policies from an outcome-based perspective. Supporting visualizations illustrate a consistent downward transition, occurring on a property-by-property basis. We feel this interpretation is overly prescriptive, and not in keeping with the intent of the policy.

Recommendation: Staff provide clarification on the notion of height and density transitions, and what is deemed ‘appropriate’ without being overly prescriptive in the specific tools to be used, such as angular planes.

### *Previously Made Comments*

Finally, Davies Howe submitted a letter to the City of Mississauga on Policy Bundle 3 on behalf of Edenshaw. Although a number of comments have been addressed through revised language in the Draft Official Plan, a few comments remain unaddressed. We respectively revisit the following comments and requests for clarifications, with policy references updated to reflect the relevant policy number in the Draft Official Plan:

- Replacement of parking in Strategic Growth Areas (Policies 12.1.2.6 and 13.1.2.6): The intent of these policies is unclear. If their intent is that the same number of existing surface parking spaces be replaced, then these policies are contradictory to recent City objectives to reduce the amount of parking spaces. If the intent of the policy is instead to direct that proposed parking spaces should be supplied underground or in structured parking, without stipulating an amount, then this should be made clearer.
- Maximum height permissions for Residential High-Rise designations (Policy 10.2.5.10): Restricting new development to the height of existing buildings is inconsistent with provincial direction to increase density in appropriate areas.
- Non-residential use requirements (Policy 13.2.5.2.2): Minimum requirements for the provision of non-residential uses have the effect of limiting much-needed residential development by imposing requirements that do not reflect market conditions.
- Streets to be considered for transit-supportive uses in Neighbourhoods (Policy 14.1.1.10): Clarification is needed on why only Neighbourhood Arterials are included (as opposed to other Arterials like Strategic Growth Arterials), which Major Collectors are intended to be included, and what areas surrounding an intersection would be covered by this policy.
- Unit mix requirements in developments proposing 50+ units (Policy 5.2.4): We note that the Draft Official Plan changed the language around unit mix from “will include” to “is encouraged” (with the rate itself changing from 30% 2-bedroom units and 10% 3-bedroom units to 50% providing a mix of 2- and 3-bedroom units). However, if the unit mix is now simply being encouraged, clarification is needed on the purpose of identifying criteria where a reduced requirement would be considered. It is our opinion that unit mixes should be determined by the market, as 2- and 3-bedroom units can be less affordable, sometimes competing with other housing forms that may be more desirable.
- Minimum tower separation distances in Major Nodes and Community Nodes (Policies 13.2.3.4.4.b. and 13.3.3.3.4.b.): Although we note the minimum required separation distance has been reduced from 40 m to 30 m in the Draft Official Plan, this requirement is still not reflective of compact urban development. We recommend these policies be revised to 25 m, consistent with the industry standard, or be implemented through a guideline in place of policy.
- The use of Inclusionary Zoning to secure affordable housing (introductory language to Section 5.3.3 Provide Affordable Housing): Introductory language should be revised to clarify that the City may only require affordable housing through Inclusionary Zoning policies within Protected Major Transit Station Areas.

On behalf of Edenshaw, we thank you for the opportunity to provide our thoughts on the Draft Official Plan. We are happy to meet with staff to discuss any of the above comments. We are

continuing to review and will provide additional feedback before the April 8<sup>th</sup> commenting deadline.

If you have any questions, please do not hesitate to contact me at 647-497-8000 ext. 3 or [blair@sajeckiplanning.com](mailto:blair@sajeckiplanning.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Scorgie'.

Blair Scorgie  
M.Arch., B.U.R.Pl., MCIP, RPP  
Partner, Sajecki Planning Inc.

Attached:

Bundle 3 Draft Policies – Comments of Edenshaw Developments Limited (submitted by Davies Howe, dated August 10, 2023)

August 10, 2023

**By E-Mail Only to *official.plan@mississauga.ca***

Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, Ontario L5B 3C1

***Attention: Sharleen Bayovo, Planner, Official Plan Review***

Dear Ms. Bayovo:

**Re: City of Mississauga Official Plan Review – Bundle 3 Draft Policies  
 Comments of Edenshaw Developments Limited**

We are counsel to Edenshaw Developments Limited (“Edenshaw”), the owner of various lands in the City of Mississauga (the “City”). As an active developer in the City, Edenshaw has been monitoring the City’s Official Plan Review and is pleased to submit its feedback on the draft policies put forward as Bundle 3.

In summary, Edenshaw is concerned with many of the proposed policies as currently drafted, as there are multiple instances where they do not reflect the City’s stated objectives to update its existing designations so that they are reflective of the provincial intent to diversify housing options and reduce the complexity and rigidity that acts as a barrier for creating more housing options.

### **Height Limiting Policies**

There are various policies proposed that would arbitrarily limit the height of new development, particularly in areas delineated as Major Transit Station Areas (“MTSAs”).

For example, policies 11.3.2, 12.3.3, 12.4.5, 12.5.3, 13.2.2.3, 13.2.3.3, 13.2.3.5, 13.3.2.1, 13.3.3.2, 13.3.4.1.4, 14.1.4.c and 14.2.3, among others, directly limit heights in different MTSAs. In addition, proposed Schedule 8, while still pending approval from the Region of Peel, contains various building height schedules which outline both minimum and maximum heights for various protected MTSAs (“PMTSAs”). For example, Map C14 of Official Plan Amendment No. 144 contains the Building Height Schedule for the Hurontario LRT – Mineola, Port Credit PMTSA and substantially limits heights throughout this area. As a result, it is directly contradictory to recent provincial direction to support increased residential density in MTSAs, which is evident from the Minister of Municipal



Affairs and Housing (the “Minister”) modifying the Region of Peel’s new Official Plan to delete the provision stating that “*maximum heights [in MTSAs] may be established at the discretion of the local municipality*”. Further, the Minister stated in a letter to Mayor Bonnie Crombie dated May 12, 2023, that the intent of this modification was to ensure that transit supportive outcomes are achieved and that both the Province and the City are in a realistic position to deliver the pledged housing goals. In the above-noted policies and schedules, the City is now seeking to introduce maximum heights in both MTSAs and PMTSAs. This is directly in conflict with the Minister’s direction and these policies and schedules should be deleted to the extent that they impose maximum heights.

Similarly, proposed policy 10.1.5.14 permits maximum heights for lands designated as Residential High-Rise to be specified in Character Areas or Special Site provisions and, where there is no specification, that the maximum height be no greater than the tallest existing building on the property. The restriction that new development may not exceed the height of an existing building is not consistent with provincial direction to *increase* density in appropriate areas.

### **Parking Replacement Requirements in Strategic Growth Areas**

Proposed policies 12.1.2.6 and 13.1.2.6 require proposals for redevelopment to replace existing surface parking areas in the Urban Growth Centre and Nodes, respectively. The intent of this policy is unclear. If its intent is that the same number of existing surface parking spaces be replaced, then these policies are contradictory to recent City objectives to reduce the amount of parking spaces required due to the fact that parking consumes significant space, is costly to construct and can contribute to more costly housing. If the intent of the policy is instead to direct that new parking spaces proposed, without stipulating an amount, should be supplied underground or in structured parking, then this should be made clearer.

### **Unduly Prescriptive Policies Not Reflective of Site-Specific Context**

Proposed policy 5.1 sets out the New Housing Supply Objectives for the City. Policy 5.1.2 provides that phased development will ensure that a full range and mix of housing types is provided in each development phase and policy 5.1.4 provides that, to achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units will include a minimum of 30% of the total number of units as 2-bedroom units and a minimum of 10% of the total number of units as 3-bedroom units. Edenshaw is concerned that requiring a minimum of 30% of units as 2-bedroom units is not appropriate in many circumstances and may reduce the affordability of housing. Further, should the City wish to introduce this prescriptive requirement, it should not be in an official plan, but rather provided as a guideline to be applied flexibly to reflect site-specific attributes and circumstances that may support increased or decreased unit mixes. The guidelines should also define what

qualifies as a 1-bedroom, 2-bedroom and 3-bedroom unit (i.e. whether a 1-bedroom + den would be considered a 1-bedroom unit or a 2-bedroom unit).

Proposed policy 10.1.6.3 is also unduly prescriptive, as it would require an official plan amendment for any development application in a Mixed Use designation that proposes less than 10% of the total building gross floor area for non-residential uses. Further, proposed policy 10.1.6.6 requires a development master plan for any Residential High-Rise proposal that is not combined with other permitted uses. Although mixed-use development, and even a certain minimum amount of non-residential uses, may be encouraged in certain locations, single use residential buildings may also be appropriate in certain mixed use areas.

Proposed policies 13.2.3.4.4 and 13.3.3.3.4 require a minimum separation distance of 40 metres between any portions of buildings that are greater than six storeys in height. These policies are not consistent with Provincial and municipal policies promoting a compact urban form that efficiently utilizes lands. They are overly prescriptive and minimum building separation distances are more appropriate as a recommendation in a guideline document, as is currently the case, for example, in the Port Credit Built Form Guide. Strict adherence to a building separation distance is not possible or appropriate in many situations and requiring an official plan amendment to permit a reduction in separation distance will create additional red tape and slow down the provision of housing further. In addition, in an urban setting, a separation distance of 40 metres in all circumstances, even as a non-binding recommendation, is unreasonable, particularly where the City has recently approved new high-rise development with separation distances of less than 25 metres.

Proposed policy 13.2.5.2.2 provides that redevelopment in the Uptown Node that results in loss of office floor space will not be permitted unless the same amount of office floor space is replaced. This policy has the potential to limit residential development and fails to recognize that there may be circumstances where office replacement is not feasible and/or is not reflective of current office trends where work-from-home and flexible/shared office spaces are more prominent, and less office space is required.

Chapter 16 outlines the Special Site Policies, which include policies in relation to the lands located on the east and west side of Hurontario Street between Floradale Drive and Harbourn Road/North Service Road. Item (a) requires parts of those lands to provide a minimum of three floors of non-residential uses in buildings immediately adjacent to Hurontario Street and Queensway West. This requirement is unduly restrictive, and fails to consider the feasibility and viability of such space.

### **More Clarity is Required**

Proposed policy 14.1.10 provides that local area reviews will consider the appropriateness of transit supportive uses for areas along Neighbourhood Arterials,

select Major Collectors and Region of Peel Arterials and at their intersections. In these areas, local area policies may permit additional heights and densities. This policy lacks clarity as it is unclear why only Neighbourhood Arterials are included (as opposed to other Arterials like Strategic Growth Arterials), which Major Collectors are intended to be included and what areas surrounding an intersection would be covered by this policy.

Proposed policy 5.2.3 outlines the City's policies in relation to the provision of affordable housing. In particular, the introductory paragraph indicates that affordable housing should be included on large redevelopment sites as a matter of good planning and that the City will implement inclusionary zoning to secure affordable housing in MTSA's. This statement should be clarified to confirm that the City may only require affordable housing through applicable inclusionary zoning within PMTSA's. It is also unclear what the City will consider to be a "large redevelopment site".

Proposed policy 10.2 is in relation to Land Use Designations in Local Area Plans. It indicates that, in addition to the general land use designations, Local Area Plans may develop land use designations specific to the area they address. This draft policy is followed by a Draft Proposed Residential Land Use Designation Map. It is unclear what the purpose of the Map is given that it is not referenced in policy 10.2.

### **Port Credit Local Area Plan**

We understand that the Port Credit Local Area Plan ("PCLAP") was adopted by City Council in 2014 and has not been substantially amended since. The draft Bundle 3 policies put forward a proposed draft of a revised version of the PLCAP. While this draft contains some important and timely amendments, Edenshaw is concerned that certain proposed policies may obstruct the provision of new housing in appropriate locations within Port Credit.

First, proposed policy 5.2 states that the Port Credit Community Node has the potential to reach the targeted density of 200 residents and jobs combined per hectare for the PMTSA. While this statement may be factually correct, pursuant to the Region of Peel's Official Plan, this is a minimum density target and the policy should be revised to reflect that.

Second, Schedules 2A, 2B and 2C were not updated. These schedules restrict the height in the Port Credit area and do not reflect the existing or planned context of that area. These Schedules also do not reflect the proposed Map C14 in Schedule 8 of the City's Official Plan, which also contains a Building Height Schedule for the Port Credit PMTSA. Regardless, as the Port Credit area is now a PMTSA, maximum height policies are contradictory to the Minister's modification to the Region of Peel's Official Plan that removed the provision stating that local municipalities may identify maximum heights in MTSA's.

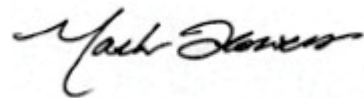
Last, the existing PCLAP contains transition policies which have been interpreted by the City to require strict transition in height from the future LRT station to the Credit River and Lake Ontario. These policies have not been amended to provide further clarity as to what constitutes appropriate transition. In our submission, these policies should be revised so that it is clear that transition does not need to occur in a linear fashion and that it should not be interpreted restrictively, but rather as a general guiding built-form objective, and subject to site-specific considerations.

## Conclusion

We thank you for the opportunity to provide comments and look forward to reviewing and providing comments upon receipt of the next draft of the City's proposed Official Plan.

Kindly ensure that we are included on the City's notification list for the Official Plan review.

Yours truly,  
**DAVIES HOWE LLP**



Mark R. Flowers  
Professional Corporation

MRF: go

copy: David Sajecki and Dylan Dewsbury, Sajecki Planning  
Client

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March 18, 2024

**Chairman & Members**

**Planning and Development Committee**

City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L5B 3C1

**Re: Draft New Official Plan & Ahmed Group's Mixed Use Project For 1000 And 1024 Dundas Street East, Redevelopment Project At 15, 19, 23 and 27 Pearl Street, The Confederation Parkway Frontage Lands And Development At 6405 Hurontario Street, City Of Mississauga**

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I am a land use planning consultant for the Ahmed Group of Companies Inc. and its related parties as listed in Schedule 'A' (the "**Ahmed Group**").

**Site-Specific Official Plan Amendment and Zoning By-law Amendment Site at 1000 and 1024 Dundas Street East**

While my clients support the introduction of residential use into the Dixie Employment Area, as envisioned by the Dundas Connects Master Plan, the City's participation in Ontario Land Tribunal mediation hearings for their proposed redevelopment on the 1000 and 1024 Dundas Street East site, the City's initiatives related to establishing a Heritage Conservation District in Streetsville, the Ontario Ministry of Transportation's improvements to Mississauga Road, as well as the Queen Elizabeth Way Highway, my clients are seeking changes to the draft new Official Plan ("**NOP**").

WZMH Architects Inc. have prepared building concept plans for Ahmed Group's site at 1000 and 1024 Dundas Street East, which envision a mixed-use building with at-grade commercial uses and purpose-built rental apartment units. The Planning and Development Committee ("**PDC**") received a staff report regarding the site-specific Official Plan Amendment and Zoning By-law Amendment applications related to the proposed redevelopment for the 1000 and 1024 Dundas Street site at the meeting on June 26, 2023, which identified some outstanding issues. Since that time, the Ahmed Group's consulting team has submitted numerous reports and revised plans to the City of Mississauga to address these issues. The City of Mississauga, Mother Parkers Tea and Coffee Inc., and the Ahmed Group have also participated in many Ontario Land Tribunal mediation meetings to pursue the resolution of outstanding issues related to Ahmed Group's proposed redevelopment for the 1000 and 1024 Dundas Street East site. The Ahmed Group intends to continue to work cooperatively with the City of Mississauga and Mother Parkers Tea and Coffee Inc. to resolve the outstanding matters. Ahmed Group is concerned that the City of Mississauga's draft NOP would prejudice their site-specific Official Plan Amendment and Zoning By-law Amendment applications for the 1000 and 1024 Dundas Street site. Therefore, we have prepared this submission to the Planning and Development Committee.

**Draft NOP Reflects City of Mississauga Official Plan Amendments Which Are Under Appeal OR Have Not Been Approved by The Region of Peel And for which There Are Outstanding Concerns**



The Ahmed Group participated in the processing of Official Plan Amendment No. 141 (“**OPA 141**”) through both written and oral submissions. By letters dated May 27, 2022, and July 4, 2022, they set out a number of concerns with OPA 141, which was then in draft form. Ahmed Group solicitors appeared before the Planning and Development Committee (“**PDC**”) on May 9, 2022, and July 5, 2022, and made oral submissions on behalf of their client regarding OPA 141. The draft NOP incorporates the policies and map schedules in this OPA 141, despite these concerns. The Ahmed Group has appealed OPA 141 to the Ontario Land Tribunal (the “Tribunal”), pursuant to section 17(24) of the Planning Act, as it failed to address our previously stated concerns.

### **Employment Land Conversion For The 1000 and 1024 Dundas Street East Site**

Under the in-force City of Mississauga Official Plan (“**MOP**”), the 1000 and 1024 Dundas Street East site is designated as being within the Employment Area and the Dixie Employment Area. Ahmed Group’s solicitors previously made written submissions to the PDC on May 6, 2022, May 27, 2022, and July 4, 2022, regarding the OPAs for Major Transit Station Areas. In addition, the Ahmed Group’s solicitors made oral submissions to the PDC regarding the Draft OPAs on May 9, 2022, May 30, 2022, and July 5, 2022. Ahmed Group’s solicitors also wrote to PDC to reiterate Ahmed Group’s objections to some policies and land use designations within OPA 143 and OPA 144 (the “**Draft OPAs**”) as they apply to the 1000 and 1024 Dundas Street East site. The Draft OPAs were considered by the PDC on August 8, 2022. The Region of Peel has not approved these Official Plan Amendments because of concerns expressed by the Ontario Ministry of Municipal Affairs and Housing, as well as others regarding their content. We continue to ask the PDC to respect the Planning Act and good planning principles.

Official Plan Amendment No. 144 (“**OPA 144**”) also continues to maintain these designations for this site while removing the designation from other lands in the vicinity. Similarly, the draft NOP includes the 1000 and 1024 Dundas Street East site in the Employment Area on Schedule 1, as well as Schedule 7 and in the Dixie Employment Area on Map 15 – 1. The policy in Section 9.3.2 in the draft NOP seeks to protect Employment Areas, and policy in section 15.5.1 in the NOP prohibits employment land conversion and also indicates that employment land conversion requests may only be considered through the Region of Peel Official Plan municipal comprehensive review process. However, the Province removed the 1000 and 1024 Dundas Street East site from the Provincially Significant Employment Zone (“**PSEZ**”) in recognition of their importance in providing the non-employment uses that are essential to supporting planned transit infrastructure on Dundas Street East. Moreover, in the new Region of Peel Official Plan (“**New ROP**”) adopted on April 28, 2022, and that the former Ontario Minister of Municipal Affairs and Housing modified, as well as approved on November 4, 2022, does not designate the 1000 and 1024 Dundas Street East site as Employment Areas on Schedule E-4. In addition, New ROP Policy 5.8.16 directs local municipalities to designate Employment Areas in accordance with Schedule E-4. In this regard, local official plans must include Employment Areas designations that match Schedule E-4. Maintaining the Employment Area, as well as the Dixie Employment Area designation and applying a new Employment Commercial designation on the 1000 and 1024 Dundas Street East site does not accord with the Province’s approach to these lands and does not conform with the New ROP. **By failing to remove the 1000 and 1024 Dundas Street East site from the Employment Commercial, Employment Area, and Dixie Employment Area, both OPA 144 and the draft NOP fail to conform with the New ROP and therefore do not meet the statutory test for approval under the Planning Act.**

Therefore, the city must remove this site from the Employment Commercial, Employment Area, and Dixie Employment Area designation. We assume that the reference in Table 11-1 of the NOP to Schedule 11g is

referring to Schedule 8g. We request the 1000 and 1024 Dundas Street East site be exempt from Table 11-1 and the policy in Section 11.3.1 of the draft NOP, which seeks to protect the Employment Commercial designation shown on Schedule 8g of the NOP for this site. Since Ahmed Group's proposed redevelopment for the 1000 and 1024 Dundas Street East site shall reduce the amount of non-residential space on this site, and this site is currently designated Mixed Use in the existing Official Plan, we request that this site also be exempt from the policy in Section 11.3.2 of the draft NOP.

### **Maximum Height For The 1000 and 1024 Dundas Street East Site**

On March 4, 2022, the Federal Government, Provincial Government, and the City of Mississauga announced that they would collectively be contributing \$675 million in funding to three transit projects within the City of Mississauga. The design and construction of the Dundas Bus Rapid Transit line between Cooksville and Etobicoke is one of these three projects. In addition, the environmental assessment studies for the Dundas Bus Rapid Transit line are also proceeding.

The new ROP Map E-5 Major Transit Station Area includes the site within the Primary Major Transit Station Area for the planned Tomken Road Bus Rapid Transit Station. Schedule 1 of the draft NOP designates the 1000 and 1024 Dundas Street East site as a Major Transit Station Area, and Schedules 8, as well as 8g of the draft NOP, also designates this site as a Protected Major Transit Station Area. However, Schedule 8g of the draft NOP, as well as OPA 144, seek to limit building heights on the 1000 and 1024 Dundas Street East site to a maximum of 9 storeys. This maximum building height limitation for this site is unreasonably strict, given the property's proximity to the higher-order protected major transit station to be located at the intersection of Dundas Street East and Tomken Road. In addition, the height limitation is inappropriate because it:

- (i) fails to recognize the height of the existing 16 storey building at 935 Dundas Street East, which is located to the northwest of this site
- (ii) fails to conform to Section 9.2.1.8 of the MOP, which directs tall buildings to Major Transit Station Areas;
- (iii) fails to conform to Section 9.2.1.9 of the MOP regarding the need for greater building height to achieve appropriate street enclosure in relation to the right-of-way width;
- (iv) is inconsistent with Section 1.1.1 e) of the Provincial Policy Statement, which promotes transit-supportive development, intensification, a cost-effective development pattern, optimization of transit investments, and minimizing land consumption;
- (v) is inconsistent with Section 2.2.4.2 of the A Place to Grow Plan, which seeks to maximize the number of potential transit riders within walking distance of a station in a Major Transit Station Area;
- (vi) is inconsistent with Section 2.2.4.9 d) of the A Place to Grow Plan, which prohibits land uses in a built form that would adversely affect the achievement of transit-supportive densities; and,
- (vii) fails to recognize that this site is a key location within the Dundas Street East corridor, and the policy in Section 11.12.2 supports buildings up to 25 storeys in height at key locations within this corridor.

We assume that the reference in Table 11-1 of the draft NOP to Schedule 11g is referring to Schedule 8g. We request the 1000 and 1024 Dundas Street East site be exempt from Table 11-1, the policy in Section 11.5.1 of the draft NOP seeks to protect the maximum 9 storey building height limit shown on Schedule 8g of the NOP for this site and Schedule 8g.

The maximum 8 storey building height limit the policy in Section 10.2.5.10 of the draft NOP is proposing for lands designated Residential High-Rise is also inappropriate for the 1000 and 1024 Dundas Street East

site for the above-cited reasons why the maximum 9 storey building height limit is considered inappropriate for this site.

On May 9th, 2022, during a public meeting for the Major Transit Station Area Official Plan Amendment, Councillor Parrish rightfully questioned city staff on the necessity of maximum heights as proposed in the draft official plan amendment, as well as the rights of landowners to appeal. The following was said:

*Councillor Carolyn Parrish*

*Yes, thank you very much for your presentation. I read this all very carefully, and the map, the reason I'm looking at Cooksville isn't because I'm the Councillor there it's because I'm a resident there, and I, I first of all was also Chair of the Planning and Growth Committee at the Region (of Peel), and at no point did we talk about heights? Is this a unique preoccupation with Mississauga or is this something we were instructed to look at?*

*Bashar Al-Hussaini, City Planner and Project Lead*

*So in order for MTSAs to be protected MTSAs which would basically mean enable inclusionary zoning among other things and protect policies from appeal, we would need to define heights, minimum and maximum heights. **Those heights are also currently being used to guide densities within the MTSAs.** In terms of requirements for heights, we have proposed this approach because we felt that the FSI approach in terms of build-form is potentially not the best route to take, and that height requirements would be more sort of prescriptive.*

*Councillor Carolyn Parrish*

*So, what I'm hearing from you was this was a decision internal decision to look at heights rather than FSI?*

*Bashar Al-Hussaini, City Planner and Project Lead*

*Correct*

*Councillor Carolyn Parrish*

*So, if the world is going to tall towers, tall point towers. We're going to stick with little block buildings if we have to?*

*Bashar Al-Hussaini, City Planner and Project Lead*

*So in terms of meeting the minimum density targets, umm...*

*Councillor Carolyn Parrish*

*I get all of that. I lived in the Region – I'm telling you. **So, you're telling me that this is a decision made locally, and once it's made, if it goes into our MTSA (Major Transit Station Area Official Plan Amendment), its not appealable and there is no negotiations?***

*Bashar Al-Hussaini, City Planner and Project Lead*

**If it's approved, correct.**

The decision to use maximum heights to guide density is contradictory to both Provincial and Regional land use policy that directs the City to optimize public investment around higher-order transit and use existing land and infrastructure efficiently in order to support complete communities through compact built form. The policy in Section 11.3.4 d. in the draft NOP states that:

*"recognizing that some Protected Major Transit Station Areas will have limited opportunities*

*to accommodate a mix of uses and varying building forms due to the existing and planned context"*

We request that a site-specific policy be added to the draft NOP which explicitly states that the policy in Section 11.3.4.d. in the draft NOP does not apply to the 1000 and 1024 Dundas Street East site

#### **Land Use For The 1000 and 1024 Dundas Street East Site**

On June 11, 2018, the City of Mississauga Planning and Development Committee endorsed the Dundas Connects Master Plan, which recommended that:

*"Lands that are currently designated mixed use along the (Dundas) corridor and near major transit stations should also allow for residential, major office, and institutional uses to support the achievement of intensification targets." Ahmed Group's Proposal implements this recommendation. Ahmed Group's project will assist the City in realizing the Dundas Connects Master Plan vision for the Dundas Street corridor, which is that it becomes a destination which is: "Urban and Bold. Urbanize, improve transit, intensify land use, and create transit-oriented development. Give the corridor a strong identity, making it 'the street' of Mississauga" and "...a safe, unique destination where people want to walk, bike, eat, shop, and be entertained."*

The proposed rental apartment units within a compact urban form and the creation of a vibrant public realm by including the highest intensity transit-supportive grade-related commercial uses close to the planned bus rapid transit station conforms with Section 2.2.4.10 of the A Place to Grow Plan.

The purpose-built rental apartment units that the Ahmed Group is proposing for the 1000 and 1024 Dundas Street East site will assist the Region in meeting its stated goal of ensuring an adequate supply of rental housing to meet local needs. In this regard, these purpose-built rental apartment units will assist the Region in fulfilling the ROP policy objective in Section 5.9.3 and the policy in Section 5.9.11 which sets a minimum target of 25% of all new housing units having a rental tenure.

In addition, the 1000 and 1024 Dundas Street East site should be exempt from Table 11-1 and the Employment Commercial policies in Sections 10.2.10.1, 10.2.10.2, 11.3.1, 15.4.9.1, 15.4.9.2, 15.4.9.3, and 15.4.9.4 in the draft NOP because they do not conform to the New ROP.

By failing to remove the 1000 and 1024 Dundas Street East site from the Employment Area and Dixie Employment Area, the draft NOP fails to conform with the New ROP and therefore does not meet the statutory test for approval under the Planning Act. Therefore, the City must remove this site from the Employment Area, Employment Commercial, and Dixie Employment Area designation. Accordingly, we seek the re-designation of the 1000 and 1024 Dundas Street East site on proposed draft map "Protected Major Transit Station Area Schedule 8g" from "Employment Commercial" to "Residential High Rise" which would allow for the future redevelopment of this property for a building containing residential uses in accordance with the New ROP without the need for an Official Plan Amendment. In addition, we request that a site-specific policy be added to the Official Plan which would permit a broader range of commercial uses on the ground floor of the proposed redevelopment: office, retail store, financial institution, personal service establishment, restaurant, take-out restaurant, and veterinary clinic.

### **Confederation Parkway, Dundas Street East, Pearl Street and Hurontario Street Road Width**

Schedule 6 of the draft NOP designates Dundas Street East as a 42 m wide public street whereas Line 27 in Table 7-2 Street Functional Classification-Arterials in the draft NOP indicates that the Dundas Street East right of way shall be 35 m in width. We seek confirmation that Dundas Street East shall have an ultimate right of way width of 42 m. Schedule 6 of the draft NOP designates Hurontario Street to the north of Eglinton Avenue as a 45 m wide public street.

Table 7-2 Street Functional Classification-Arterials also contains the following statement: "At intersections, grade separations, or major physical topographical constraints, wider rights-of-way may be required to accommodate necessary features such as embankments, auxiliary lanes, additional pavement or sidewalk widths, transit facilities, cycling facilities, or to provide for necessary improvements for safety in certain locations". A similar statement is contained in Note 1 on Schedule 6 of the draft NOP.

In addition, the policy in Section 7.3.2.6 in the draft NOP states that: "Minor adjustments to the basic right-of-way widths and alignments for streets may be made without further amendment to this Plan, subject to the City being satisfied that the role and function of such streets are maintained. Major adjustments to the basic right-of-way widths and alignments for streets will require an amendment to this Plan, excluding any adjustments based on the recommendation of an approved environmental assessment study subject to the Environmental Assessment Act".

Note 2 on map Schedule 6 of the draft NOP provides the City the authority to acquire as much land as it wants for the Hazel MacCallion Light Rapid Transit Line on Hurontario Street and for the Dundas Bus Rapid Transit Line on Dundas Street East.

Schedule 6 of the City of Mississauga's draft NOP designates Confederation Parkway between Dundas Street West and King Street West as a 30 m wide public street.

My client has no control over the changes that the City may make to their existing environmental assessment study for the Dundas Bus Rapid Transit line to modify the right-of-way width requirements for Dundas Street East, and the above-cited notes on map Schedule 6, the above-cited statement in Table 7-



2, as well as the above-cited policy in Section 7.3.2.6, provides the City unreasonable discretion in requesting a land dedication for road widening purposes in excess of the maximum right of way width shown for Dundas Street East in Schedule 6 of the draft NOP. My client requires certainty with respect to the future planned width of Dundas Street East and the City's road widening requirements to proceed with their redevelopment for the site at 1000 and 1024 Dundas Street East. Similarly, my client requires certainty with respect to the future planned width of Pearl Street, Hurontario Street, as well as Confederation Parkway and the City's road widening requirements for these streets to proceed with their development projects on sites adjoining these public streets. Therefore, we request that the site at 6405 Hurontario Street, as well as 1000 and 1024 Dundas Street East be exempt from the proposed policy in Section 7.3.2.6, notes 1 and 2 on map Schedule 6 and the above-cited statement in Table 7-2 Street Functional Classification-Arterials of the draft NOP. Further we request that a site-specific policy be included in the draft NOP confirming that Confederation Parkway between Dundas Street West and King Street West shall have a maximum road allowance of 30 m in the future. Finally, we request that a site-specific policy be included in the draft NOP confirming that Pearl Street road allowance between Queen Street South and Broadway Street will not be widened in the future.

#### **RWDI Land Use Compatibility Studies & City of Mississauga's Peer Review Consultants**

The policy in section 11.3.4 e. of the draft NOP indicates that development shall be subject to required land use compatibility assessments identified by the city. The City of Mississauga has prepared terms of reference for Dundas Street Land Use Compatibility Studies. Rowan Williams Davies & Irwin Inc., a world-renowned international multi-disciplinary engineering firm (herein "**RWDI**") has completed a Land Use Compatibility Study for the proposed redevelopment for the 1000 and 1024 Dundas Street East site. RWDI has completed multiple analyses addressing noise and air quality considerations related to the land use compatibility of this proposed redevelopment with surrounding existing industrial uses, including Mother Parkers Tea and Coffee Inc.'s existing facilities. RWDI's analysis overwhelmingly supports the redevelopment of the site moving forward through the Official Plan Amendment and Zoning By Law Amendment stage.

The City of Mississauga has retained Dillon Consulting to undertake a peer review of RWDI's studies, and we request the PDC to confirm that they expect the City's peer review consultants to review RWDI's studies in accordance with Ontario Ministry of Environment Conservation and Parks published guidelines.

#### **Municipally Led Land Use Compatibility Study For Lands Located On The South Side Of Dundas Street East Between Haynes Road and Stanfield Road**

OPA 141 seeks to designate the 1000 and 1024 Dundas Street East site as Special Site 4 within the Dixie Employment Area. The Special Site 4 policies apply only to the lands on Dundas Street East between Haines Road and Blundell Road, which includes the 1000 and 1024 Dundas Street East site. The new policies in OPA 141 require a municipally-led land use compatibility assessment and a municipally-initiated amendment to the Official Plan to facilitate a change in land use permissions. The requirement that the City initiate this study serves no legitimate planning purpose, and the practical effect of the policy is seemingly to prevent my client from having their application to amend the MOP processed by the City. The policy in Section 16.127.2 in the draft NOP also requires a municipally-led land use compatibility study for the lands located on the south side of Dundas Street East between Haynes Road and Stanfield Road, including the 1000 and 1024 Dundas Street East site. We request that the policies in section 16.127.2 of the NOP be deleted because it serves no legitimate planning purpose, given the existing and ongoing peer review

process by Dillon Consulting. This municipally-led study will not address any matters that the consulting work described under the RWDI Land Use Compatibility Studies & City of Mississauga's Peer Review Consultants heading above will not already have considered. The Section 16.127.2 policy in the draft NOP should also be deleted because it provides no timeline for the completion of this City of Mississauga-led land use compatibility study, a description of the scope of this study, a description of the study objectives, and how, as well as when the results of this study are to be implemented. Finally, the Ahmed Group believes that this policy prevents them from exercising its statutory right to the processing of the site-specific Official Plan Amendment and Zoning By-law Amendment applications related to the proposed redevelopment for the 1000 and 1024 Dundas Street site.

### **Noise Attenuation Walls**

We request that the proposed redevelopment on the 1000 and 1024 Dundas Street East site be exempt from the new policy in Section 11.12.3 k in the draft NOP. We are requesting this exemption because this policy does not support the use of noise attenuation walls and would preclude the installation of the noise attenuation walls that RWDI noise consultants have recommended for the proposed outdoor amenity area on the roof of the podium of the redevelopment for the 1000 and 1024 Dundas Street East site. These walls shall mitigate the noise that Dundas Street East traffic generates and that the existing stationary industrial uses located to the south of this site generate.

### **Finished Grade**

The Arcadis (IBI Group) Functional Servicing Report for the proposed redevelopment for the 1000 and 1024 Dundas Street East site identified the need for changes to the finished grade of most of this site to effectively manage stormwater within this redevelopment while simultaneously matching the finished grade of the adjoining properties. Both the Region of Peel civil engineering staff and the City of Mississauga civil engineering staff have reviewed this report and agree with the site servicing recommendations within it. This stormwater management plan has been designed to respect the grades of surrounding properties and Dundas Street East in conformity with the policy in Section 8.3.12 c of the draft NOP. However, the policy in Section 8.6.3.8 of the draft NOP states that "site development should respect and maintain existing grades on site". We request that the 1000 and 1024 Dundas Street East Street East site be exempt from this policy so that an appropriate stormwater management plan can be implemented on this site.

### **Tree Planting and Tree Preservation**

Redevelopment within Major Transit Station Areas along the Dundas Street East will support the Dundas Bus Rapid Transit Line that all three levels of government are funding. Redevelopment within Major Transit Station Areas along Hurontario Street will support the Hazel McCallion Light Rapid Transit Line. Additional trees will need to be planted within Dundas Street East as part of the construction of the Dundas Bus Rapid Transit Line and within the future redevelopments within these Major Transit Station Areas to increase the tree canopy in this corridor. Similarly, additional trees will need to be planted within Hurontario Street as part of the construction of the Hazel McCallion Light Rapid Transit and within the future redevelopments within these Major Transit Station Areas to increase the tree canopy in this corridor. In addition, existing tree removal shall also be required as part of the future redevelopment of the Hurontario Street site, as well as the 1000 and 1024 Dundas Street East site, and therefore we are requesting that this site be exempt from the policies in Sections 8.3.12, 8.6.3.14 d., and 17.4.10 p. of the draft NOP which address tree preservation.

## **Intangible Cultural Resources**

Paragraphs 1 to 9 of subsection 1 (2) of Ontario Regulation 569/22 pursuant to the Heritage Act sets out specific explicit criteria for the evaluation of cultural heritage resources. Therefore, the policy in Section 6.2.9 of the NOP is not defensible to the extent that it requires the identification and conservation of “*intangible*” cultural resources.

## **Compatibility Definition**

We request that the first sentence in the definition of compatibility in the draft NOP be replaced with the following sentence:

*“means development that does not introduce unacceptable adverse impacts.”*

We are requesting that the reference to the phrase “*enhances the site and surrounding area*” because it is very vague, subjective and there are no quantitative tests that could be used to measure conformity to a policy containing this phrase.

## **Transportation Capacity of the Queen Elizabeth Way Highway and Confederation Parkway between Dundas Street West and King Street To Support Higher Density Development Should Be Recognized**

One of the principles of the new NOP is that future growth be focused around transit to address traffic congestion. However, the Official Plan does not recognize the significant transportation capacity available to sites located close to the QEW highway interchanges or properties fronting onto Major Collector Roads. We request that an additional policy be added to the draft NOP that recognizes the significant transportation capacity available to sites located close to the QEW highway interchanges and supports greater building heights on such sites.

The policy in Section 14.1.1.4 c in the draft NOP is too restrictive because it directs residential high density only to Neighbourhood Arterials and it fails to recognize the significant vehicle carrying capacity of the Queen Elizabeth Way Highway or the Confederation Parkway Strategic Growth Area Major Collector. Schedule 3 of the draft NOP designates Confederation Parkway between Dundas Street East and King Street as Strategic Growth Area Major Collector and Schedule 1, as well as Map 14-1, both identify some of the lands fronting onto the west side of Confederation Parkway between Dundas Street East and King Street as Neighbourhoods. Apartment redevelopment is appropriate on these lands fronting onto the west side of Confederation Parkway because these lands are within walking distance of the planned Confederation Parkway Bus Rapid Transit Station for the Dundas Bus Rapid Transit Line. Therefore, we request that the Neighbourhood Major Collector Road close to the QEW highway interchange and the Confederation Parkway Strategic Growth Area Major Collector between Dundas Street West and King Street as should both be referenced in the policy in Section 14.1.1.4 c in the draft NOP.

## **Streetsville Heritage Conservation District & The 15, 19, 23 and 27 Pearl Street Site**

Ahmed Group’s heritage consultant, Owen Scott’s Cultural Heritage Evaluation Report for the properties at 15, 19, and 23 Pearl Street concluded that the existing buildings on these properties do not have any

cultural heritage value. The policy in Section 13.3.12.3.2 of the new draft Official Plan states: “*Mississauga will encourage the investigation of the Streetsville historic core area as an area to be examined for future designation as a Heritage Conservation District in accordance with the Ontario Heritage Act.*”

Since the existing buildings on the properties at 15, 19, 23 and 27 Pearl Street do not have any cultural heritage value, we request that they be excluded from the Streetsville Heritage Conservation District and that the City’s heritage consultants recognize that these existing building do not contribute to the cultural heritage of the Streetsville Heritage Conservation District.

Ahmed Group is proposing to temporarily use the properties at 15, 19, 23 and 27 Pearl Street for surface parking while the City processes the site-specific Official Plan Amendment and Zoning By-law Amendment applications for a purpose-built rental apartment building which they are proposing for these properties. Ahmed Group’s heritage consultant, Owen Scott, shall be preparing a heritage impact assessment report in support of the proposed 12 storey purpose-built rental apartment building for these properties at the appropriate time.

#### **Amenity Areas within Proposed Development Outside of Strategic Growth Areas**

Outside of Strategic Growth Areas the policy in Section 8.4.5.8 the draft NOP requires that new residential developments include outdoor at grade amenity area. Within Strategic Growth Areas the policies in Section 8.4.5.8 also permit alternatives to the provision of at grade outdoor amenity area within developments. We are requesting a similar exemption from the outdoor at grade amenity area requirement for the new apartment development within Neighbourhoods.

#### **Land Assembly Outside of Strategic Growth Areas**

In our view the policy in Section 8.3.6 in the new Official Plan is too restrictive because it only support land assembly within Strategic Growth Areas. The policy should also support land assembly in Neighbourhoods to create viable parcels for higher density development with fewer accesses points to Major Collector Roads.

#### **Seniors Focused Purpose Built Rental Apartment Building In Neighbourhoods**

Provincial plans, the new ROP and the draft NOP seek to establish complete communities. The policy in Section 3.2.5 c of the draft NOP permits a range of housing options within low residential Neighbourhoods. Housing serving different age cohorts are required within Neighbourhoods to create complete communities. Ahmed Group is proposing to develop the Confederation Parkway site for a seniors focused purpose-built rental apartment building. Seniors could occupy these could conveniently walk the planned Confederation Parkway Bus Rapid Station, as well as the existing commercial uses in the surrounding area. Since, Schedule 1 and Map 14-1 of the draft NOP continue to designate Confederation Parkway site as part of the Cooksville Neighbourhood. We request that the policy in Section 5.3.1.7 of the NOP which states that seniors housing is to be located outside of Neighbourhoods be deleted.

### **Playgrounds Within 400 m of All New Residential Development**

The policy in Section 11.9.2 of the draft NOP seeks to establish playgrounds within 400 m of all new residential development. Although this is a desirable objective, it shall be difficult to realize it within 400 m of the 2505 Dixie Road site. There should be some recognition of these constraints in the NOP by adding the phrase “*to the extent possible*” to the policy in Section 11.9.2.

Hawkins Glen Park is located approximately 400 m from the purpose-built rental apartment redevelopment proposed for the 1000 and 1024 Dundas Street East site. The signals at the Tomken Road and Dundas Street East intersection are located between Hawkins Glen Park and this proposed apartment redevelopment, which will allow the residents of this apartment redevelopment to safely cross Dundas Street East to access this existing park. Since the City has the ability to construct a playground within this existing park, we request confirmation that this proposed redevelopment conforms to the proposed policy in Section 11.9.2 of the draft NOP.

### **Street Design with Ground Floor Residential Uses Facing A Public Street**

Ahmed Group is proposing residential uses on the ground floor of their proposed purpose-built rental apartment building redevelopment on the 15, 19, 23 and 27 Pearl Street site. Ahmed Group is also proposing to construct a new public sidewalk within Pearl Street adjacent to the traffic lanes in front of their proposed purpose-built rental apartment buildings to maximize the landscaping that can be introduced between the sidewalk and the front wall of these proposed buildings. Therefore, we are requesting that these properties be exempt from the policy in Section 7.3.3.2 which requires a separation between traffic lanes and sidewalks.

### **12 Storey Building and Residential High-Rise Designation for the 15, 19, 23, and 27 Pearl Street Site**

The Ahmed Group is proposing to redevelop the 15, 19, 23, and 27 Pearl Street site for a 12 storey purpose-built rental apartment building. A 12 storey purpose-built rental apartment building is desirable on this site for the following reasons, among others: the people occupying the proposed apartments units on this site would likely support the existing businesses on the surrounding properties, including those fronting onto Queen Street South (which is the main street within Streetsville); increasing the resident population in proximity to the Streetsville Village Square is desirable because it is likely to increase the utilization of this existing public square and the patronage of the programs which are offered within this existing public square during the summer; a building of this height will help enclose Streetsville Village Square and serve as a landmark that would reinforce this existing public square as a central focal point within Streetsville; the City requires additional rental apartment units to achieve the housing targets within the New ROP; this site is within walking distance of the Streetsville GO Train Station and Schedule F-1 of the New ROP designates the Metrolinx Milton GO Train Line as “GO Rail Line- 15 Minute Two Way All Day” service in the future; and the policy in Section 3.4.3 of the draft NOP indicates the future development shall be directed to Strategic Growth Areas and Map 3-1 Strategic Growth Areas of the draft NOP identifies the includes this site within a Strategic Growth Area by applying the Planned Major Transit Station Area to this site.

Although 12 storey buildings are generally considered mid-rise buildings, the description of mid-rise buildings in Section 10.2.5.8 b. of the draft NOP indicates that mid-rise buildings are those that have a building height that is equivalent to the width of the street on which they front. Since Pearl Street is 15 m in



width and Ahmed Group's proposed 12 storey building exceeds the width of Pearl Street, it shall be considered a Residential High-Rise building. Therefore, we are requesting that the current Mixed-Use designation on Schedule 7 of the new draft Official Plan for the 15, 19, 23, and 27 Pearl Street site be replaced by the Residential High-Rise designation.

The policy in Section 13.3.12.1.1 of the draft NOP permits a maximum building height of 7 storeys on lands designated Residential High-Rise within the Streetsville Community Node. The purpose-built rental apartment building that the Ahmed Group is proposing to redevelop the Pearl Street site for warrants an increase in maximum permitted building height from 7 storeys to 12 storeys for the reasons summarized above. Therefore, we are requesting that a site-specific policy be added to the draft NOP for the 15, 19, 23 and 27 Pearl Street site that permits a 12 storey building on this site and exempts this site from the policy in Section 10.2.5.10, as well as the policy in Section 13.3.12.1.1 of the draft NOP.

#### **Street Tree Planting with the Proposed 12 Storey Building on the 15, 19, 23 and 27 Pearl Street Site**

The four properties at 15, 19, 23 and 27 Pearl Street are proposed to be redeveloped for a purpose-built rental apartment building. This land assembly implements the policy in Section 8.3.6 of the draft NOP. New trees are to be planted within the existing Pearl Street road allowance as part of the redevelopment of the Pearl Street site for a new 12 storey purpose-built rental apartment building to improve the attractiveness of the existing streetscape. Unfortunately, given the size of these three properties, it is not possible to conserve any of the existing trees on this site with this proposed purpose-built rental apartment building, and therefore we are requesting that this site be exempt from the policies in Sections 8.6.3.14d. and 17.4.10 p. of the draft NOP which address tree preservation.

#### **45-degree Plane Maximum Building Height Limit Measured From Front Lot Line Of Public Streets**

The general application of the 45-degree plane maximum building height limit to be measured from the front lot line on the opposite side of a public street as shown in Figure 8-8 and addressed in the policy in Section 8.6.2.5 of the draft NOP is unduly onerous. The policy in Section 8.4.1.17 of the draft NOP states that the "Built form will relate to the width of the street right-of-way". In addition, as noted earlier, the policy in Section 10.2.5.8 b in the draft NOP restricts the maximum building height of development on lands designated Residential Mid-Rise to not exceed the width of the right of way on which it fronts. The City should consider other public objectives when evaluating the built form proposed for specific properties. For example, the 15, 19, 23 and 27 Pearl Street site is within walking distance of the existing Streetsville GO Train Station, and the introduction of a high-rise purpose-built rental apartment building on this site would be a transit-supportive land use. The lands fronting onto the west side of Confederation Parkway between Dundas Street West and King Street West are located within a short walking distance of the planned Confederation Parkway Bus Rapid Station, and the introduction of a high-rise building along this street frontage would also be a transit-supportive land use. The proposed 12-story building for the 15, 19, 23 and 27 Pearl Street site should be considered a midrise building, but since this building has a height that exceeds the 15 m width of Pearl Street, the policy in Section 10.2.5.8 b in the draft NOP precludes this. The purpose-built rental apartment building proposed for the 15, 19, 23 and 27 Pearl Street site has a building height that exceeds a 45-degree plane measured from the front lot line on the opposite side of the public street on which they would front. Therefore, we request that the 45-degree plane maximum building height limit shown in Figure 8-8 and the policies in Section 8.6.2.5, Section 10.2.5.8 b, as well as the policy in Section 8.4.1.17 in the draft NOP be deleted.

## **Parking Structure Requirements And Land Uses Required in Above Grade Parking Structure Facades**

The policy in Section 7.6.8 a. requires that within Strategic Growth Areas a portion of the on-site parking be supplied within parking structures and Map 3-1 of the draft NOP includes the 6405 Hurontario Street site within a Strategic Growth Area. The draft NOP is seeking higher density redevelopment within Major Transit Station Areas along the Hazel McCallion Light Rapid Transit Line. There should be some recognition that many of the properties fronting onto the Hazel McCallion Light Rapid Transit Line within Major Transit Station Areas have a surface parking lot. The policy in section 7.6.10 e. of the draft NOP requires the integration of commercial uses into the ground-level façade of parking structures and the policy in Section 8.3.11 of this plan indicates that above grade parking structures visible from the public realm should be lined with residential, commercial and office uses. Because of the shape, as well as orientation of some of the properties adjacent to this new Light Rapid Transit Line they may not have sufficient exposure to the Hurontario Street for office uses or commercial uses within the façade of an above grade parking structure to be viable. Until the transit modal split within the Hurontario Street corridor increases with the new Light Rapid Transit Line requiring that a portion of the on-site parking spaces be supplied within a parking structure and requires the integration of commercial uses into the ground-level façade of parking structures is unreasonable. The draft NOP should recognize that it is appropriate to continue to have surface parking lots on properties fronting onto Hurontario Street during an interim time period until the transit modal split increases. We request that a site-specific policy be added to Section 16 of the draft NOP for the 6405 Hurontario Street site to exempt this site from this parking structure requirement.

There is a publicly accessible surface parking lot located within the interior of the block bounded by Queen Street South, Pearl Street, Broadway Street, and Thomas Street within the Streetsville Community Node. There is an existing public lane that provides vehicular access to this surface parking lot from Queen Street South and Thomas Street. To support future intensification within the Streetsville Community Node, there may be the need to replace this existing publicly accessible surface parking lot with an above-grade parking structure to meet the future parking space demand. The policy in section 7.6.10 e. of the draft NOP requires the integration of commercial uses into the ground-level façade of parking structures, and the policy in Section 8.3.11 of this plan indicates that above-grade parking structures visible from the public realm should be lined with residential, commercial, and office uses. The buildings fronting onto Queen Street South and the Streetsville Village Square should remain the primary focus of future retail land uses. Therefore, we question the desirability of requiring commercial or office uses within an above-grade parking structure facing this existing public lane within the Streetsville Community Node. Therefore, we would suggest that the words “public realm” in the policy in Section 8.3.11 be replaced with “public street” and that the words “where appropriate” be incorporated into the policy in Section 7.6.10 e in the draft NOP, respectively.

## **Land Uses, Building Height, and Building Density at the property at 6405 Hurontario Street**

Schedule 1 City Structure of the draft NOP designates the 6405 Hurontario Street property as Gateway Corporate Centre designates Th and Schedule 7, as well as Schedule 8h in the draft NOP, designate this site Office. We request that the 6405 Hurontario Street site be designated Major Node on Schedule 1 City Structure in the draft NOP. We request that the 6405 Hurontario Street site be removed from Map 15-1 Employment Areas. We also request that the 6405 Hurontario Street site be designated Mixed Use on Schedule 7, as well as Schedule 8h Land Use Schedule and Area Exemption from LBPA Operating Area

on Schedule 7. We request that the Schedule 8h Building Height Schedule show a minimum 1 storey building height limit for the 6405 Hurontario Street site. The policy in Section 15.2.1 of the draft NOP envisions a mix of high-density employment uses within the Gateway Corporate Centre, and Schedule 8h requires a minimum building height of 3 storeys for new development. We request that the Schedule 8h Building Height Schedule show a minimum 1 storey building height be reduced to 1 storey for the 6405 Hurontario Street site and that a site-specific policy permitting a range of development densities on the 6405 Hurontario Street site be added to Section 16 of the draft NOP.

## Conclusion

We would like to thank the City Councillors, the City of Mississauga Planning and Development Committee, and the City of Mississauga land use planning staff for making the changes that we have requested to the draft NOP. Notwithstanding this submission, our client would welcome the opportunity to engage with the City on these issues, as it believes that its concerns can and should be addressed through modifications to these policy documents.

Yours truly,

**PLAN LOGIC CONSULTING INC.**



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John Lohmus, MCIP, RPP

cc:

1. Moe Ahmed, President and CEO, Ahmed Group
2. Timothy Harris, COO, Ahmed Group
3. The Hon. Peter Van Loan, Partner, Aird & Berlis LLP

**Schedule "A"**  
**The Ahmed Group Related Parties**

- AG (1000 & 1024 Dundas St. E.) GP Inc.
- AG (1000 & 1024 Dundas St. E.) LP
- Ahmed Group (1000 Dundas St. E.) Inc.
- Ahmed Group (1024 Dundas St. E.) Inc.,
- Ahmed Group (1808 Mississauga Rd.) Inc.
- Ahmed Group (1808 Mississauga Rd.) Inc.
- Mohammed Ahmed
- Mississauga Muslim Community Centre Inc.
- Mississauga Muslim Media Hub
- 1000066871 Ontario Inc.
- Dundas Landowners' Association
- Or such entities resulting from the amalgamation and reorganization of any of the aforementioned entities, as applicable from time to time.

6.5  
**PLAN LOGIC CONSULTING INC.**  
316 Willa Road  
Mississauga, ON L5G 2GB  
tel 647-273-7454

March 18, 2024

**Chairman & Members**  
**Planning and Development Committee**  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

**Re: Draft New Official Plan & Ahmed Group's Mixed Use Project For 1000 And 1024 Dundas Street East, Redevelopment Project At 15, 19, 23 and 27 Pearl Street, The Confederation Parkway Frontage Lands And Development At 6405 Hurontario Street, City Of Mississauga**

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I am a land use planning consultant for the Ahmed Group of Companies Inc. and its related parties as listed in Schedule 'A' (the "**Ahmed Group**").

**Site-Specific Official Plan Amendment and Zoning By-law Amendment Site at 1000 and 1024 Dundas Street East**

While my clients support the introduction of residential use into the Dixie Employment Area, as envisioned by the Dundas Connects Master Plan, [REDACTED] the City's initiatives related to establishing a Heritage Conservation District in Streetsville, the Ontario Ministry of Transportation's improvements to Mississauga Road, as well as the Queen Elizabeth Way Highway, my clients are seeking changes to the draft new Official Plan ("**NOP**").

WZMH Architects Inc. have prepared building concept plans for Ahmed Group's site at 1000 and 1024 Dundas Street East, which envision a mixed-use building with at-grade commercial uses and purpose-built rental apartment units. The Planning and Development Committee ("**PDC**") received a staff report regarding the site-specific Official Plan Amendment and Zoning By-law Amendment applications related to the proposed redevelopment for the 1000 and 1024 Dundas Street site at the meeting on June 26, 2023, which identified some outstanding issues. Since that time, the Ahmed Group's consulting team has submitted numerous reports and revised plans to the City of Mississauga to address these issues. [REDACTED]

[REDACTED] The Ahmed Group intends to continue to work cooperatively with the City of Mississauga and Mother Parkers Tea and Coffee Inc. to resolve the outstanding matters. Ahmed Group is concerned that the City of Mississauga's draft NOP would prejudice their site-specific Official Plan Amendment and Zoning By-law Amendment applications for the 1000 and 1024 Dundas Street site. Therefore, we have prepared this submission to the Planning and Development Committee.

**Draft NOP Reflects City of Mississauga Official Plan Amendments Which Are Under Appeal OR Have Not Been Approved by The Region of Peel And for which There Are Outstanding Concerns**



The Ahmed Group participated in the processing of Official Plan Amendment No. 141 (“**OPA 141**”) through both written and oral submissions. By letters dated May 27, 2022, and July 4, 2022, they set out a number of concerns with OPA 141, which was then in draft form. Ahmed Group solicitors appeared before the Planning and Development Committee (“**PDC**”) on May 9, 2022, and July 5, 2022, and made oral submissions on behalf of their client regarding OPA 141. The draft NOP incorporates the policies and map schedules in this OPA 141, despite these concerns. The Ahmed Group has appealed OPA 141 to the Ontario Land Tribunal (the “Tribunal”), pursuant to section 17(24) of the Planning Act, as it failed to address our previously stated concerns.

### **Employment Land Conversion For The 1000 and 1024 Dundas Street East Site**

Under the in-force City of Mississauga Official Plan (“**MOP**”), the 1000 and 1024 Dundas Street East site is designated as being within the Employment Area and the Dixie Employment Area. Ahmed Group’s solicitors previously made written submissions to the PDC on May 6, 2022, May 27, 2022, and July 4, 2022, regarding the OPAs for Major Transit Station Areas. In addition, the Ahmed Group’s solicitors made oral submissions to the PDC regarding the Draft OPAs on May 9, 2022, May 30, 2022, and July 5, 2022. Ahmed Group’s solicitors also wrote to PDC to reiterate Ahmed Group’s objections to some policies and land use designations within OPA 143 and OPA 144 (the “**Draft OPAs**”) as they apply to the 1000 and 1024 Dundas Street East site. The Draft OPAs were considered by the PDC on August 8, 2022. The Region of Peel has not approved these Official Plan Amendments because of concerns expressed by the Ontario Ministry of Municipal Affairs and Housing, as well as others regarding their content. We continue to ask the PDC to respect the Planning Act and good planning principles.

Official Plan Amendment No. 144 (“**OPA 144**”) also continues to maintain these designations for this site while removing the designation from other lands in the vicinity. Similarly, the draft NOP includes the 1000 and 1024 Dundas Street East site in the Employment Area on Schedule 1, as well as Schedule 7 and in the Dixie Employment Area on Map 15 – 1. The policy in Section 9.3.2 in the draft NOP seeks to protect Employment Areas, and policy in section 15.5.1 in the NOP prohibits employment land conversion and also indicates that employment land conversion requests may only be considered through the Region of Peel Official Plan municipal comprehensive review process. However, the Province removed the 1000 and 1024 Dundas Street East site from the Provincially Significant Employment Zone (“**PSEZ**”) in recognition of their importance in providing the non-employment uses that are essential to supporting planned transit infrastructure on Dundas Street East. Moreover, in the new Region of Peel Official Plan (“**New ROP**”) adopted on April 28, 2022, and that the former Ontario Minister of Municipal Affairs and Housing modified, as well as approved on November 4, 2022, does not designate the 1000 and 1024 Dundas Street East site as Employment Areas on Schedule E-4. In addition, New ROP Policy 5.8.16 directs local municipalities to designate Employment Areas in accordance with Schedule E-4. In this regard, local official plans must include Employment Areas designations that match Schedule E-4. Maintaining the Employment Area, as well as the Dixie Employment Area designation and applying a new Employment Commercial designation on the 1000 and 1024 Dundas Street East site does not accord with the Province’s approach to these lands and does not conform with the New ROP. **By failing to remove the 1000 and 1024 Dundas Street East site from the Employment Commercial, Employment Area, and Dixie Employment Area, both OPA 144 and the draft NOP fail to conform with the New ROP and therefore do not meet the statutory test for approval under the Planning Act.**

Therefore, the city must remove this site from the Employment Commercial, Employment Area, and Dixie Employment Area designation. We assume that the reference in Table 11-1 of the NOP to Schedule 11g is

referring to Schedule 8g. We request the 1000 and 1024 Dundas Street East site be exempt from Table 11-1 and the policy in Section 11.3.1 of the draft NOP, which seeks to protect the Employment Commercial designation shown on Schedule 8g of the NOP for this site. Since Ahmed Group's proposed redevelopment for the 1000 and 1024 Dundas Street East site shall reduce the amount of non-residential space on this site, and this site is currently designated Mixed Use in the existing Official Plan, we request that this site also be exempt from the policy in Section 11.3.2 of the draft NOP.

### **Maximum Height For The 1000 and 1024 Dundas Street East Site**

On March 4, 2022, the Federal Government, Provincial Government, and the City of Mississauga announced that they would collectively be contributing \$675 million in funding to three transit projects within the City of Mississauga. The design and construction of the Dundas Bus Rapid Transit line between Cooksville and Etobicoke is one of these three projects. In addition, the environmental assessment studies for the Dundas Bus Rapid Transit line are also proceeding.

The new ROP Map E-5 Major Transit Station Area includes the site within the Primary Major Transit Station Area for the planned Tomken Road Bus Rapid Transit Station. Schedule 1 of the draft NOP designates the 1000 and 1024 Dundas Street East site as a Major Transit Station Area, and Schedules 8, as well as 8g of the draft NOP, also designates this site as a Protected Major Transit Station Area. However, Schedule 8g of the draft NOP, as well as OPA 144, seek to limit building heights on the 1000 and 1024 Dundas Street East site to a maximum of 9 storeys. This maximum building height limitation for this site is unreasonably strict, given the property's proximity to the higher-order protected major transit station to be located at the intersection of Dundas Street East and Tomken Road. In addition, the height limitation is inappropriate because it:

- (i) fails to recognize the height of the existing 16 storey building at 935 Dundas Street East, which is located to the northwest of this site
- (ii) fails to conform to Section 9.2.1.8 of the MOP, which directs tall buildings to Major Transit Station Areas;
- (iii) fails to conform to Section 9.2.1.9 of the MOP regarding the need for greater building height to achieve appropriate street enclosure in relation to the right-of-way width;
- (iv) is inconsistent with Section 1.1.1 e) of the Provincial Policy Statement, which promotes transit-supportive development, intensification, a cost-effective development pattern, optimization of transit investments, and minimizing land consumption;
- (v) is inconsistent with Section 2.2.4.2 of the A Place to Grow Plan, which seeks to maximize the number of potential transit riders within walking distance of a station in a Major Transit Station Area;
- (vi) is inconsistent with Section 2.2.4.9 d) of the A Place to Grow Plan, which prohibits land uses in a built form that would adversely affect the achievement of transit-supportive densities; and,
- (vii) fails to recognize that this site is a key location within the Dundas Street East corridor, and the policy in Section 11.12.2 supports buildings up to 25 storeys in height at key locations within this corridor.

We assume that the reference in Table 11-1 of the draft NOP to Schedule 11g is referring to Schedule 8g. We request the 1000 and 1024 Dundas Street East site be exempt from Table 11-1, the policy in Section 11.5.1 of the draft NOP seeks to protect the maximum 9 storey building height limit shown on Schedule 8g of the NOP for this site and Schedule 8g.

The maximum 8 storey building height limit the policy in Section 10.2.5.10 of the draft NOP is proposing for lands designated Residential High-Rise is also inappropriate for the 1000 and 1024 Dundas Street East

site for the above-cited reasons why the maximum 9 storey building height limit is considered inappropriate for this site.

On May 9th, 2022, during a public meeting for the Major Transit Station Area Official Plan Amendment, Councillor Parrish rightfully questioned city staff on the necessity of maximum heights as proposed in the draft official plan amendment, as well as the rights of landowners to appeal. The following was said:

*Councillor Carolyn Parrish*

*Yes, thank you very much for your presentation. I read this all very carefully, and the map, the reason I'm looking at Cooksville isn't because I'm the Councillor there it's because I'm a resident there, and I, I first of all was also Chair of the Planning and Growth Committee at the Region (of Peel), and at no point did we talk about heights? Is this a unique preoccupation with Mississauga or is this something we were instructed to look at?*

*Bashar Al-Hussaini, City Planner and Project Lead*

*So in order for MTSAs to be protected MTSAs which would basically mean enable inclusionary zoning among other things and protect policies from appeal, we would need to define heights, minimum and maximum heights. **Those heights are also currently being used to guide densities within the MTSAs.** In terms of requirements for heights, we have proposed this approach because we felt that the FSI approach in terms of build-form is potentially not the best route to take, and that height requirements would be more sort of prescriptive.*

*Councillor Carolyn Parrish*

*So, what I'm hearing from you was this was a decision internal decision to look at heights rather than FSI?*

*Bashar Al-Hussaini, City Planner and Project Lead*

*Correct*

*Councillor Carolyn Parrish*

*So, if the world is going to tall towers, tall point towers. We're going to stick with little block buildings if we have to?*

*Bashar Al-Hussaini, City Planner and Project Lead*

*So in terms of meeting the minimum density targets, umm...*

*Councillor Carolyn Parrish*

*I get all of that. I lived in the Region – I'm telling you. **So, you're telling me that this is a decision made locally, and once it's made, if it goes into our MTSA (Major Transit Station Area Official Plan Amendment), its not appealable and there is no negotiations?***

Bashar Al-Hussaini, City Planner and Project Lead

**If it's approved, correct.**

The decision to use maximum heights to guide density is contradictory to both Provincial and Regional land use policy that directs the City to optimize public investment around higher-order transit and use existing land and infrastructure efficiently in order to support complete communities through compact built form. The policy in Section 11.3.4 d. in the draft NOP states that:

*"recognizing that some Protected Major Transit Station Areas will have limited opportunities*

*to accommodate a mix of uses and varying building forms due to the existing and planned context"*

We request that a site-specific policy be added to the draft NOP which explicitly states that the policy in Section 11.3.4.d. in the draft NOP does not apply to the 1000 and 1024 Dundas Street East site

#### **Land Use For The 1000 and 1024 Dundas Street East Site**

On June 11, 2018, the City of Mississauga Planning and Development Committee endorsed the Dundas Connects Master Plan, which recommended that:

*"Lands that are currently designated mixed use along the (Dundas) corridor and near major transit stations should also allow for residential, major office, and institutional uses to support the achievement of intensification targets." Ahmed Group's Proposal implements this recommendation. Ahmed Group's project will assist the City in realizing the Dundas Connects Master Plan vision for the Dundas Street corridor, which is that it becomes a destination which is: "Urban and Bold. Urbanize, improve transit, intensify land use, and create transit-oriented development. Give the corridor a strong identity, making it 'the street' of Mississauga" and "...a safe, unique destination where people want to walk, bike, eat, shop, and be entertained."*

The proposed rental apartment units within a compact urban form and the creation of a vibrant public realm by including the highest intensity transit-supportive grade-related commercial uses close to the planned bus rapid transit station conforms with Section 2.2.4.10 of the A Place to Grow Plan.

The purpose-built rental apartment units that the Ahmed Group is proposing for the 1000 and 1024 Dundas Street East site will assist the Region in meeting its stated goal of ensuring an adequate supply of rental housing to meet local needs. In this regard, these purpose-built rental apartment units will assist the Region in fulfilling the ROP policy objective in Section 5.9.3 and the policy in Section 5.9.11 which sets a minimum target of 25% of all new housing units having a rental tenure.

In addition, the 1000 and 1024 Dundas Street East site should be exempt from Table 11-1 and the Employment Commercial policies in Sections 10.2.10.1, 10.2.10.2, 11.3.1, 15.4.9.1, 15.4.9.2, 15.4.9.3, and 15.4.9.4 in the draft NOP because they do not conform to the New ROP.

By failing to remove the 1000 and 1024 Dundas Street East site from the Employment Area and Dixie Employment Area, the draft NOP fails to conform with the New ROP and therefore does not meet the statutory test for approval under the Planning Act. Therefore, the City must remove this site from the Employment Area, Employment Commercial, and Dixie Employment Area designation. Accordingly, we seek the re-designation of the 1000 and 1024 Dundas Street East site on proposed draft map "Protected Major Transit Station Area Schedule 8g" from "Employment Commercial" to "Residential High Rise" which would allow for the future redevelopment of this property for a building containing residential uses in accordance with the New ROP without the need for an Official Plan Amendment. In addition, we request that a site-specific policy be added to the Official Plan which would permit a broader range of commercial uses on the ground floor of the proposed redevelopment: office, retail store, financial institution, personal service establishment, restaurant, take-out restaurant, and veterinary clinic.

#### **Confederation Parkway, Dundas Street East, Pearl Street and Hurontario Street Road Width**

Schedule 6 of the draft NOP designates Dundas Street East as a 42 m wide public street whereas Line 27 in Table 7-2 Street Functional Classification-Arterials in the draft NOP indicates that the Dundas Street East right of way shall be 35 m in width. We seek confirmation that Dundas Street East shall have an ultimate right of way width of 42 m. Schedule 6 of the draft NOP designates Hurontario Street to the north of Eglinton Avenue as a 45 m wide public street.

Table 7-2 Street Functional Classification-Arterials also contains the following statement: "At intersections, grade separations, or major physical topographical constraints, wider rights-of-way may be required to accommodate necessary features such as embankments, auxiliary lanes, additional pavement or sidewalk widths, transit facilities, cycling facilities, or to provide for necessary improvements for safety in certain locations". A similar statement is contained in Note 1 on Schedule 6 of the draft NOP.

In addition, the policy in Section 7.3.2.6 in the draft NOP states that: "Minor adjustments to the basic right-of-way widths and alignments for streets may be made without further amendment to this Plan, subject to the City being satisfied that the role and function of such streets are maintained. Major adjustments to the basic right-of-way widths and alignments for streets will require an amendment to this Plan, excluding any adjustments based on the recommendation of an approved environmental assessment study subject to the Environmental Assessment Act".

Note 2 on map Schedule 6 of the draft NOP provides the City the authority to acquire as much land as it wants for the Hazel MacCallion Light Rapid Transit Line on Hurontario Street and for the Dundas Bus Rapid Transit Line on Dundas Street East.

Schedule 6 of the City of Mississauga's draft NOP designates Confederation Parkway between Dundas Street West and King Street West as a 30 m wide public street.

My client has no control over the changes that the City may make to their existing environmental assessment study for the Dundas Bus Rapid Transit line to modify the right-of-way width requirements for Dundas Street East, and the above-cited notes on map Schedule 6, the above-cited statement in Table 7-



2, as well as the above-cited policy in Section 7.3.2.6, provides the City unreasonable discretion in requesting a land dedication for road widening purposes in excess of the maximum right of way width shown for Dundas Street East in Schedule 6 of the draft NOP. My client requires certainty with respect to the future planned width of Dundas Street East and the City's road widening requirements to proceed with their redevelopment for the site at 1000 and 1024 Dundas Street East. Similarly, my client requires certainty with respect to the future planned width of Pearl Street, Hurontario Street, as well as Confederation Parkway and the City's road widening requirements for these streets to proceed with their development projects on sites adjoining these public streets. Therefore, we request that the site at 6405 Hurontario Street, as well as 1000 and 1024 Dundas Street East be exempt from the proposed policy in Section 7.3.2.6, notes 1 and 2 on map Schedule 6 and the above-cited statement in Table 7-2 Street Functional Classification-Arterials of the draft NOP. Further we request that a site-specific policy be included in the draft NOP confirming that Confederation Parkway between Dundas Street West and King Street West shall have a maximum road allowance of 30 m in the future. Finally, we request that a site-specific policy be included in the draft NOP confirming that Pearl Street road allowance between Queen Street South and Broadway Street will not be widened in the future.

#### **RWDI Land Use Compatibility Studies & City of Mississauga's Peer Review Consultants**

The policy in section 11.3.4 e. of the draft NOP indicates that development shall be subject to required land use compatibility assessments identified by the city. The City of Mississauga has prepared terms of reference for Dundas Street Land Use Compatibility Studies. Rowan Williams Davies & Irwin Inc., a world-renowned international multi-disciplinary engineering firm (herein "**RWDI**") has completed a Land Use Compatibility Study for the proposed redevelopment for the 1000 and 1024 Dundas Street East site. RWDI has completed multiple analyses addressing noise and air quality considerations related to the land use compatibility of this proposed redevelopment with surrounding existing industrial uses, including Mother Parkers Tea and Coffee Inc.'s existing facilities. RWDI's analysis overwhelmingly supports the redevelopment of the site moving forward through the Official Plan Amendment and Zoning By Law Amendment stage.

The City of Mississauga has retained Dillon Consulting to undertake a peer review of RWDI's studies, and we request the PDC to confirm that they expect the City's peer review consultants to review RWDI's studies in accordance with Ontario Ministry of Environment Conservation and Parks published guidelines.

#### **Municipally Led Land Use Compatibility Study For Lands Located On The South Side Of Dundas Street East Between Haynes Road and Stanfield Road**

OPA 141 seeks to designate the 1000 and 1024 Dundas Street East site as Special Site 4 within the Dixie Employment Area. The Special Site 4 policies apply only to the lands on Dundas Street East between Haines Road and Blundell Road, which includes the 1000 and 1024 Dundas Street East site. The new policies in OPA 141 require a municipally-led land use compatibility assessment and a municipally-initiated amendment to the Official Plan to facilitate a change in land use permissions. The requirement that the City initiate this study serves no legitimate planning purpose, and the practical effect of the policy is seemingly to prevent my client from having their application to amend the MOP processed by the City. The policy in Section 16.127.2 in the draft NOP also requires a municipally-led land use compatibility study for the lands located on the south side of Dundas Street East between Haynes Road and Stanfield Road, including the 1000 and 1024 Dundas Street East site. We request that the policies in section 16.127.2 of the NOP be deleted because it serves no legitimate planning purpose, given the existing and ongoing peer review

process by Dillon Consulting. This municipally-led study will not address any matters that the consulting work described under the RWDI Land Use Compatibility Studies & City of Mississauga's Peer Review Consultants heading above will not already have considered. The Section 16.127.2 policy in the draft NOP should also be deleted because it provides no timeline for the completion of this City of Mississauga-led land use compatibility study, a description of the scope of this study, a description of the study objectives, and how, as well as when the results of this study are to be implemented. Finally, the Ahmed Group believes that this policy prevents them from exercising its statutory right to the processing of the site-specific Official Plan Amendment and Zoning By-law Amendment applications related to the proposed redevelopment for the 1000 and 1024 Dundas Street site.

### **Noise Attenuation Walls**

We request that the proposed redevelopment on the 1000 and 1024 Dundas Street East site be exempt from the new policy in Section 11.12.3 k in the draft NOP. We are requesting this exemption because this policy does not support the use of noise attenuation walls and would preclude the installation of the noise attenuation walls that RWDI noise consultants have recommended for the proposed outdoor amenity area on the roof of the podium of the redevelopment for the 1000 and 1024 Dundas Street East site. These walls shall mitigate the noise that Dundas Street East traffic generates and that the existing stationary industrial uses located to the south of this site generate.

### **Finished Grade**

The Arcadis (IBI Group) Functional Servicing Report for the proposed redevelopment for the 1000 and 1024 Dundas Street East site identified the need for changes to the finished grade of most of this site to effectively manage stormwater within this redevelopment while simultaneously matching the finished grade of the adjoining properties. [REDACTED] the Region of Peel civil engineering staff [REDACTED] have reviewed this report and agree with the site servicing recommendations within it. This stormwater management plan has been designed to respect the grades of surrounding properties and Dundas Street East in conformity with the policy in Section 8.3.12 c of the draft NOP. However, the policy in Section 8.6.3.8 of the draft NOP states that "site development should respect and maintain existing grades on site". We request that the 1000 and 1024 Dundas Street East Street East site be exempt from this policy so that an appropriate stormwater management plan can be implemented on this site.

### **Tree Planting and Tree Preservation**

Redevelopment within Major Transit Station Areas along the Dundas Street East will support the Dundas Bus Rapid Transit Line that all three levels of government are funding. Redevelopment within Major Transit Station Areas along Hurontario Street will support the Hazel McCallion Light Rapid Transit Line. Additional trees will need to be planted within Dundas Street East as part of the construction of the Dundas Bus Rapid Transit Line and within the future redevelopments within these Major Transit Station Areas to increase the tree canopy in this corridor. Similarly, additional trees will need to be planted within Hurontario Street as part of the construction of the Hazel McCallion Light Rapid Transit and within the future redevelopments within these Major Transit Station Areas to increase the tree canopy in this corridor. In addition, existing tree removal shall also be required as part of the future redevelopment of the Hurontario Street site, as well as the 1000 and 1024 Dundas Street East site, and therefore we are requesting that this site be exempt from the policies in Sections 8.3.12, 8.6.3.14 d., and 17.4.10 p. of the draft NOP which address tree preservation.

## **Intangible Cultural Resources**

Paragraphs 1 to 9 of subsection 1 (2) of Ontario Regulation 569/22 pursuant to the Heritage Act sets out specific explicit criteria for the evaluation of cultural heritage resources. Therefore, the policy in Section 6.2.9 of the NOP is not defensible to the extent that it requires the identification and conservation of “*intangible*” cultural resources.

## **Compatibility Definition**

We request that the first sentence in the definition of compatibility in the draft NOP be replaced with the following sentence:

*“means development that does not introduce unacceptable adverse impacts.”*

We are requesting that the reference to the phrase “*enhances the site and surrounding area*” because it is very vague, subjective and there are no quantitative tests that could be used to measure conformity to a policy containing this phrase.

## **Transportation Capacity of the Queen Elizabeth Way Highway and Confederation Parkway between Dundas Street West and King Street To Support Higher Density Development Should Be Recognized**

One of the principles of the new NOP is that future growth be focused around transit to address traffic congestion. However, the Official Plan does not recognize the significant transportation capacity available to sites located close to the QEW highway interchanges or properties fronting onto Major Collector Roads. We request that an additional policy be added to the draft NOP that recognizes the significant transportation capacity available to sites located close to the QEW highway interchanges and supports greater building heights on such sites.

The policy in Section 14.1.1.4 c in the draft NOP is too restrictive because it directs residential high density only to Neighbourhood Arterials and it fails to recognize the significant vehicle carrying capacity of the Queen Elizabeth Way Highway or the Confederation Parkway Strategic Growth Area Major Collector. Schedule 3 of the draft NOP designates Confederation Parkway between Dundas Street East and King Street as Strategic Growth Area Major Collector and Schedule 1, as well as Map 14-1, both identify some of the lands fronting onto the west side of Confederation Parkway between Dundas Street East and King Street as Neighbourhoods. Apartment redevelopment is appropriate on these lands fronting onto the west side of Confederation Parkway because these lands are within walking distance of the planned Confederation Parkway Bus Rapid Transit Station for the Dundas Bus Rapid Transit Line. Therefore, we request that the Neighbourhood Major Collector Road close to the QEW highway interchange and the Confederation Parkway Strategic Growth Area Major Collector between Dundas Street West and King Street as should both be referenced in the policy in Section 14.1.1.4 c in the draft NOP.

## **Streetsville Heritage Conservation District & The 15, 19, 23 and 27 Pearl Street Site**

Ahmed Group’s heritage consultant, Owen Scott’s Cultural Heritage Evaluation Report for the properties at 15, 19, and 23 Pearl Street concluded that the existing buildings on these properties do not have any

cultural heritage value. The policy in Section 13.3.12.3.2 of the new draft Official Plan states: “*Mississauga will encourage the investigation of the Streetsville historic core area as an area to be examined for future designation as a Heritage Conservation District in accordance with the Ontario Heritage Act.*”

Since the existing buildings on the properties at 15, 19, 23 and 27 Pearl Street do not have any cultural heritage value, we request that they be excluded from the Streetsville Heritage Conservation District and that the City’s heritage consultants recognize that these existing building do not contribute to the cultural heritage of the Streetsville Heritage Conservation District.

Ahmed Group is proposing to temporarily use the properties at 15, 19, 23 and 27 Pearl Street for surface parking while the City processes the site-specific Official Plan Amendment and Zoning By-law Amendment applications for a purpose-built rental apartment building which they are proposing for these properties. Ahmed Group’s heritage consultant, Owen Scott, shall be preparing a heritage impact assessment report in support of the proposed 12 storey purpose-built rental apartment building for these properties at the appropriate time.

#### **Amenity Areas within Proposed Development Outside of Strategic Growth Areas**

Outside of Strategic Growth Areas the policy in Section 8.4.5.8 the draft NOP requires that new residential developments include outdoor at grade amenity area. Within Strategic Growth Areas the policies in Section 8.4.5.8 also permit alternatives to the provision of at grade outdoor amenity area within developments. We are requesting a similar exemption from the outdoor at grade amenity area requirement for the new apartment development within Neighbourhoods.

#### **Land Assembly Outside of Strategic Growth Areas**

In our view the policy in Section 8.3.6 in the new Official Plan is too restrictive because it only support land assembly within Strategic Growth Areas. The policy should also support land assembly in Neighbourhoods to create viable parcels for higher density development with fewer accesses points to Major Collector Roads.

#### **Seniors Focused Purpose Built Rental Apartment Building In Neighbourhoods**

Provincial plans, the new ROP and the draft NOP seek to establish complete communities. The policy in Section 3.2.5 c of the draft NOP permits a range of housing options within low residential Neighbourhoods. Housing serving different age cohorts are required within Neighbourhoods to create complete communities. Ahmed Group is proposing to develop the Confederation Parkway site for a seniors focused purpose-built rental apartment building. Seniors could occupy these could conveniently walk the planned Confederation Parkway Bus Rapid Station, as well as the existing commercial uses in the surrounding area. Since, Schedule 1 and Map 14-1 of the draft NOP continue to designate Confederation Parkway site as part of the Cooksville Neighbourhood. We request that the policy in Section 5.3.1.7 of the NOP which states that seniors housing is to be located outside of Neighbourhoods be deleted.

### **Playgrounds Within 400 m of All New Residential Development**

The policy in Section 11.9.2 of the draft NOP seeks to establish playgrounds within 400 m of all new residential development. Although this is a desirable objective, it shall be difficult to realize it within 400 m of the 2505 Dixie Road site. There should be some recognition of these constraints in the NOP by adding the phrase “*to the extent possible*” to the policy in Section 11.9.2.

Hawkins Glen Park is located approximately 400 m from the purpose-built rental apartment redevelopment proposed for the 1000 and 1024 Dundas Street East site. The signals at the Tomken Road and Dundas Street East intersection are located between Hawkins Glen Park and this proposed apartment redevelopment, which will allow the residents of this apartment redevelopment to safely cross Dundas Street East to access this existing park. Since the City has the ability to construct a playground within this existing park, we request confirmation that this proposed redevelopment conforms to the proposed policy in Section 11.9.2 of the draft NOP.

### **Street Design with Ground Floor Residential Uses Facing A Public Street**

Ahmed Group is proposing residential uses on the ground floor of their proposed purpose-built rental apartment building redevelopment on the 15, 19, 23 and 27 Pearl Street site. Ahmed Group is also proposing to construct a new public sidewalk within Pearl Street adjacent to the traffic lanes in front of their proposed purpose-built rental apartment buildings to maximize the landscaping that can be introduced between the sidewalk and the front wall of these proposed buildings. Therefore, we are requesting that these properties be exempt from the policy in Section 7.3.3.2 which requires a separation between traffic lanes and sidewalks.

### **12 Storey Building and Residential High-Rise Designation for the 15, 19, 23, and 27 Pearl Street Site**

The Ahmed Group is proposing to redevelop the 15, 19, 23, and 27 Pearl Street site for a 12 storey purpose-built rental apartment building. A 12 storey purpose-built rental apartment building is desirable on this site for the following reasons, among others: the people occupying the proposed apartments units on this site would likely support the existing businesses on the surrounding properties, including those fronting onto Queen Street South (which is the main street within Streetsville); increasing the resident population in proximity to the Streetsville Village Square is desirable because it is likely to increase the utilization of this existing public square and the patronage of the programs which are offered within this existing public square during the summer; a building of this height will help enclose Streetsville Village Square and serve as a landmark that would reinforce this existing public square as a central focal point within Streetsville; the City requires additional rental apartment units to achieve the housing targets within the New ROP; this site is within walking distance of the Streetsville GO Train Station and Schedule F-1 of the New ROP designates the Metrolinx Milton GO Train Line as “GO Rail Line- 15 Minute Two Way All Day” service in the future; and the policy in Section 3.4.3 of the draft NOP indicates the future development shall be directed to Strategic Growth Areas and Map 3-1 Strategic Growth Areas of the draft NOP identifies the includes this site within a Strategic Growth Area by applying the Planned Major Transit Station Area to this site.

Although 12 storey buildings are generally considered mid-rise buildings, the description of mid-rise buildings in Section 10.2.5.8 b. of the draft NOP indicates that mid-rise buildings are those that have a building height that is equivalent to the width of the street on which they front. Since Pearl Street is 15 m in



width and Ahmed Group's proposed 12 storey building exceeds the width of Pearl Street, it shall be considered a Residential High-Rise building. Therefore, we are requesting that the current Mixed-Use designation on Schedule 7 of the new draft Official Plan for the 15, 19, 23, and 27 Pearl Street site be replaced by the Residential High-Rise designation.

The policy in Section 13.3.12.1.1 of the draft NOP permits a maximum building height of 7 storeys on lands designated Residential High-Rise within the Streetsville Community Node. The purpose-built rental apartment building that the Ahmed Group is proposing to redevelop the Pearl Street site for warrants an increase in maximum permitted building height from 7 storeys to 12 storeys for the reasons summarized above. Therefore, we are requesting that a site-specific policy be added to the draft NOP for the 15, 19, 23 and 27 Pearl Street site that permits a 12 storey building on this site and exempts this site from the policy in Section 10.2.5.10, as well as the policy in Section 13.3.12.1.1 of the draft NOP.

#### **Street Tree Planting with the Proposed 12 Storey Building on the 15, 19, 23 and 27 Pearl Street Site**

The four properties at 15, 19, 23 and 27 Pearl Street are proposed to be redeveloped for a purpose-built rental apartment building. This land assembly implements the policy in Section 8.3.6 of the draft NOP. New trees are to be planted within the existing Pearl Street road allowance as part of the redevelopment of the Pearl Street site for a new 12 storey purpose-built rental apartment building to improve the attractiveness of the existing streetscape. Unfortunately, given the size of these three properties, it is not possible to conserve any of the existing trees on this site with this proposed purpose-built rental apartment building, and therefore we are requesting that this site be exempt from the policies in Sections 8.6.3.14d. and 17.4.10 p. of the draft NOP which address tree preservation.

#### **45-degree Plane Maximum Building Height Limit Measured From Front Lot Line Of Public Streets**

The general application of the 45-degree plane maximum building height limit to be measured from the front lot line on the opposite side of a public street as shown in Figure 8-8 and addressed in the policy in Section 8.6.2.5 of the draft NOP is unduly onerous. The policy in Section 8.4.1.17 of the draft NOP states that the "Built form will relate to the width of the street right-of-way". In addition, as noted earlier, the policy in Section 10.2.5.8 b in the draft NOP restricts the maximum building height of development on lands designated Residential Mid-Rise to not exceed the width of the right of way on which it fronts. The City should consider other public objectives when evaluating the built form proposed for specific properties. For example, the 15, 19, 23 and 27 Pearl Street site is within walking distance of the existing Streetsville GO Train Station, and the introduction of a high-rise purpose-built rental apartment building on this site would be a transit-supportive land use. The lands fronting onto the west side of Confederation Parkway between Dundas Street West and King Street West are located within a short walking distance of the planned Confederation Parkway Bus Rapid Station, and the introduction of a high-rise building along this street frontage would also be a transit-supportive land use. The proposed 12-story building for the 15, 19, 23 and 27 Pearl Street site should be considered a midrise building, but since this building has a height that exceeds the 15 m width of Pearl Street, the policy in Section 10.2.5.8 b in the draft NOP precludes this. The purpose-built rental apartment building proposed for the 15, 19, 23 and 27 Pearl Street site has a building height that exceeds a 45-degree plane measured from the front lot line on the opposite side of the public street on which they would front. Therefore, we request that the 45-degree plane maximum building height limit shown in Figure 8-8 and the policies in Section 8.6.2.5, Section 10.2.5.8 b, as well as the policy in Section 8.4.1.17 in the draft NOP be deleted.

## **Parking Structure Requirements And Land Uses Required in Above Grade Parking Structure Facades**

The policy in Section 7.6.8 a. requires that within Strategic Growth Areas a portion of the on-site parking be supplied within parking structures and Map 3-1 of the draft NOP includes the 6405 Hurontario Street site within a Strategic Growth Area. The draft NOP is seeking higher density redevelopment within Major Transit Station Areas along the Hazel McCallion Light Rapid Transit Line. There should be some recognition that many of the properties fronting onto the Hazel McCallion Light Rapid Transit Line within Major Transit Station Areas have a surface parking lot. The policy in section 7.6.10 e. of the draft NOP requires the integration of commercial uses into the ground-level façade of parking structures and the policy in Section 8.3.11 of this plan indicates that above grade parking structures visible from the public realm should be lined with residential, commercial and office uses. Because of the shape, as well as orientation of some of the properties adjacent to this new Light Rapid Transit Line they may not have sufficient exposure to the Hurontario Street for office uses or commercial uses within the façade of an above grade parking structure to be viable. Until the transit modal split within the Hurontario Street corridor increases with the new Light Rapid Transit Line requiring that a portion of the on-site parking spaces be supplied within a parking structure and requires the integration of commercial uses into the ground-level façade of parking structures is unreasonable. The draft NOP should recognize that it is appropriate to continue to have surface parking lots on properties fronting onto Hurontario Street during an interim time period until the transit modal split increases. We request that a site-specific policy be added to Section 16 of the draft NOP for the 6405 Hurontario Street site to exempt this site from this parking structure requirement.

There is a publicly accessible surface parking lot located within the interior of the block bounded by Queen Street South, Pearl Street, Broadway Street, and Thomas Street within the Streetsville Community Node. There is an existing public lane that provides vehicular access to this surface parking lot from Queen Street South and Thomas Street. To support future intensification within the Streetsville Community Node, there may be the need to replace this existing publicly accessible surface parking lot with an above-grade parking structure to meet the future parking space demand. The policy in section 7.6.10 e. of the draft NOP requires the integration of commercial uses into the ground-level façade of parking structures, and the policy in Section 8.3.11 of this plan indicates that above-grade parking structures visible from the public realm should be lined with residential, commercial, and office uses. The buildings fronting onto Queen Street South and the Streetsville Village Square should remain the primary focus of future retail land uses. Therefore, we question the desirability of requiring commercial or office uses within an above-grade parking structure facing this existing public lane within the Streetsville Community Node. Therefore, we would suggest that the words “public realm” in the policy in Section 8.3.11 be replaced with “public street” and that the words “where appropriate” be incorporated into the policy in Section 7.6.10 e in the draft NOP, respectively.

## **Land Uses, Building Height, and Building Density at the property at 6405 Hurontario Street**

Schedule 1 City Structure of the draft NOP designates the 6405 Hurontario Street property as Gateway Corporate Centre designates Th and Schedule 7, as well as Schedule 8h in the draft NOP, designate this site Office. We request that the 6405 Hurontario Street site be designated Major Node on Schedule 1 City Structure in the draft NOP. We request that the 6405 Hurontario Street site be removed from Map 15-1 Employment Areas. We also request that the 6405 Hurontario Street site be designated Mixed Use on Schedule 7, as well as Schedule 8h Land Use Schedule and Area Exemption from LBPA Operating Area

on Schedule 7. We request that the Schedule 8h Building Height Schedule show a minimum 1 storey building height limit for the 6405 Hurontario Street site. The policy in Section 15.2.1 of the draft NOP envisions a mix of high-density employment uses within the Gateway Corporate Centre, and Schedule 8h requires a minimum building height of 3 storeys for new development. We request that the Schedule 8h Building Height Schedule show a minimum 1 storey building height be reduced to 1 storey for the 6405 Hurontario Street site and that a site-specific policy permitting a range of development densities on the 6405 Hurontario Street site be added to Section 16 of the draft NOP.

## Conclusion

We would like to thank the City Councillors, the City of Mississauga Planning and Development Committee, and the City of Mississauga land use planning staff for making the changes that we have requested to the draft NOP. Notwithstanding this submission, our client would welcome the opportunity to engage with the City on these issues, as it believes that its concerns can and should be addressed through modifications to these policy documents.

Yours truly,

**PLAN LOGIC CONSULTING INC.**



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John Lohmus, MCIP, RPP

cc:

1. Moe Ahmed, President and CEO, Ahmed Group
2. Timothy Harris, COO, Ahmed Group
3. The Hon. Peter Van Loan, Partner, Aird & Berlis LLP

**Schedule "A"**  
**The Ahmed Group Related Parties**

- AG (1000 & 1024 Dundas St. E.) GP Inc.
- AG (1000 & 1024 Dundas St. E.) LP
- Ahmed Group (1000 Dundas St. E.) Inc.
- Ahmed Group (1024 Dundas St. E.) Inc.,
- Ahmed Group (1808 Mississauga Rd.) Inc.
- Ahmed Group (1808 Mississauga Rd.) Inc.
- Mohammed Ahmed
- Mississauga Muslim Community Centre Inc.
- Mississauga Muslim Media Hub
- 1000066871 Ontario Inc.
- Dundas Landowners' Association
- Or such entities resulting from the amalgamation and reorganization of any of the aforementioned entities, as applicable from time to time.

March 15, 2024  
City of Mississauga  
300 City Centre Dr.  
Mississauga, ON L5B 3C1  
To Whom It May Concern:

VIA EMAIL

RE: PLANNING AND DEVELOPMENT COMMITTEE

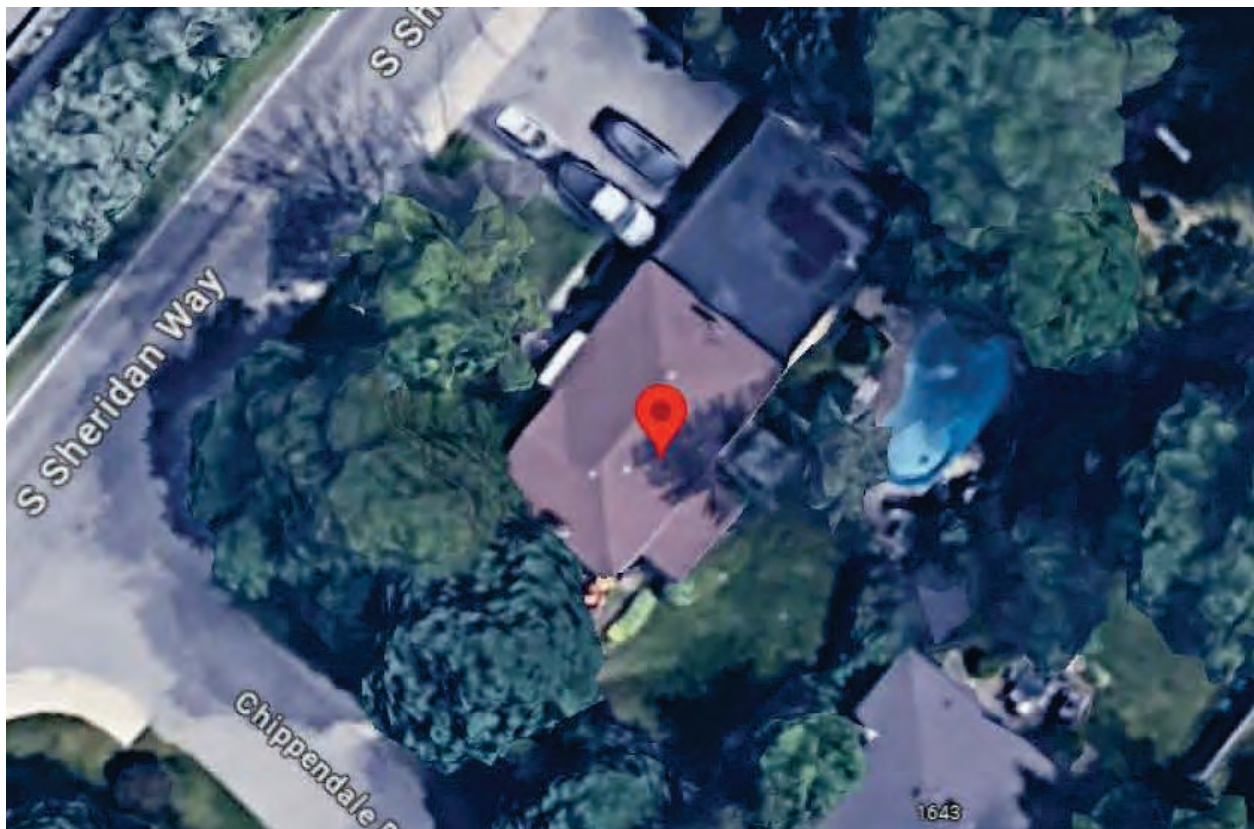
ITEM 6.4 PUBLIC MEETING (PROPOSED MISSISSAUGA OFFICIAL PLAN 2051

COMMENTS REGARDING 1830 SOUTH SHERIDAN WAY, MISSISSAUGA

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Maple and Co (“**Maple**”) is the development manager for the owners of the lands municipally known as 1830 South Sheridan Way, Mississauga (the “**Site**”).

The Site is a corner lot with a total area of 0.3-acres and has a frontage of 31-metres along South Sheridan Way and a depth of 38-metres along Chippendale Road. The Site is currently occupied by a 2-storey single-detached dwelling and garage. The Site is located east of Southdown Road.



While the immediate and surrounding context predominately features single-detached dwellings, the nearby site of 1578 Clarkson Road North is designated as Residential Medium Density and is occupied by 28-standard townhouse units known as the Coventry Lane Townhomes.



The current Mississauga Official Plan designates as Residential Low Density II, which per Policy 11.2.5.4 permits detached dwellings, semi-detached dwellings, duplex dwellings, triplexes, street townhouses, and other forms of low-rise dwellings with individual frontages. Policy 16.5.2.2 of the Clarkson-Lorne Park Neighbourhood Character Area provides however that “the Residential Low Density II designation permits: ... only detached dwellings for the area east of Southdown Road.”

In light of the City's recent acknowledgment in its Increasing Housing Choices in Neighbourhoods Study that additional housing options are required to facilitate gentle intensification in established neighbourhoods, the new Mississauga Official Plan is proposing to redesignate the site and the surrounding area from Residential Low Density II to Residential Low-Rise I, which per Policy 10.2.5.4 will permit “all low-rise street-facing dwellings, up to three storeys.”

While Maple appreciates the City's commitment to expanding housing options in the neighbourhood of Clarkson-Lorne Park, it is submitted that it would represent good planning for the City to redesignate the Site to Residential Low-Rise II, which per Policy 10.2.5.7 would permit “all types of townhouse dwellings up to four storeys and apartment buildings up to four storeys.”

The reasons for the proposed re-designation are as follows:

- (a) The Site is located west of Clarkson Road North, which was planned to have a more intensive neighbourhood character than lands east of Clarkson Road North;
- (b) The immediate neighbourhood bounded by South Sheridan Way to the north, Clarkson Road North to the east, the rail corridor to the south, and Southdown Road to the west includes a range of townhome dwellings, including the Coventry Lane Townhomes at 1578 Clarkson Road North, the Forestview Townhomes at 2020-2077 Barsuda Drive and 2025 Ambridge Court, and the townhomes at 2055-2057 Barsuda Drive, Mississauga;
- (c) The Site is adjacent to the boundaries of the Sheridan Mall-based Community Node, which is planned to become a healthy, sustainable, and complete community through the redevelopment of underutilized surface parking lots into a range of residential housing options, including mid-rise and high-rise buildings, as well as mixed use development;
- (d) The 4-storey, vertically divided and grade-related back-to-back townhouse built form is becoming a more common housing option in the City's neighbourhoods due its more affordable purchase price, family-sized units, and compatible design; and,
- (e) Maple is in the process of preparing a development application for the Site which will consist of a block of 4-storey, back-to-back townhouses, which are being designed to include generous setbacks and comply with a 45-degree rear angular plane.

To ensure that the redevelopment of the Site would respect the neighborhood's character, a Special Site Policy could be adopted that would limit the permitted use to “all grade-related types of townhouse dwellings up to four storeys, including back-to-back townhouse dwellings.”

Maple looks forward to making further comments to the City during the public consultation

process. Should you have any questions or comments about this correspondence, please do not hesitate to contact me at 613.601.4639 or [m.nemanic@mapleandcoconsulting.com](mailto:m.nemanic@mapleandcoconsulting.com).

Sincerely,

*Michael Arthur Nemanic*

Michael Nemanic

**From:** [Ben Phillips](#)  
**To:** [Courtney Plato](#); [Amina Menkad](#)  
**Subject:** FW: [EXTERNAL] PUBLIC MEETING (ALL WARDS) Proposed Mississauga Official Plan 2051 -(2175 Royal Windsor Drive)  
**Date:** Tuesday, March 19, 2024 11:00:57 AM

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**From:** Daniel Teperman <daniel.teperman@havendevolutions.ca>  
**Sent:** Monday, March 18, 2024 5:58 PM  
**To:** Angie Melo <Angie.Melo@mississauga.ca>; Andrew Whittemore <Andrew.Whittemore@mississauga.ca>; Christian Binette <Christian.Binette@mississauga.ca>  
**Cc:** Ben Phillips <Ben.Phillips@mississauga.ca>; Nick Mercouris <n.mercouris@gmail.com>; Hugh Lynch <Hugh.Lynch@mississauga.ca>  
**Subject:** [EXTERNAL] PUBLIC MEETING (ALL WARDS) Proposed Mississauga Official Plan 2051 -(2175 Royal Windsor Drive)

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**[CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.]**

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Chair and Members of Planning and Development Committee :

On behalf of the Property Owners of 2175 Royal Windsor Drive, 1252705 Ontario Limited, [herein referred to as the subject site], we are pleased to provide you with this Planning Justification Letter and Memorandum for Community Planning to evaluate as a prime candidate site for a conversion request from Employment Lands to Mixed Use Land Use Designation with buildings that will have live-work units as effective means to be consistent with the Growth Plan for the Greater Golden Horseshoe component as part of the on-going studies being carried out by Staff for both the Official Plan Review and the Clarkson Transit Station Area Study.

Our client has been participating in the ongoing Clarkson Transit Station Area Study conducted by the City of Mississauga with regards to the developing framework for a draft Amendment to OPA 117 and By-law Number 0297-2020. We understand that the introduction of sensitive land uses being permitted within the MTSA, following the completion of the Official Plan Amendment and the Air Quality Study conducted by the City of Mississauga gives rationale for the City of Mississauga planning staff to consider permitting residential uses at the subject site. Currently, our client is working on a redevelopment proposal that will introduce commercial and residential uses to the site. We believe that the proposal of these uses would benefit the area by providing much-needed housing and further align with the objectives of The Region of Peel Official Plan and the City of Mississauga Official Plan.

The Region of Peel Official Plan notes that the introduction of residential uses is subject to the completion of a local planning study by the municipality, and it is understood that an Official Plan Amendment and Zoning Bylaw Amendment will be required. Within the new proposed Regional Official Plan, the subject lands are designated within the Clarkson Village Primary Major Transit Station Area. Clarkson GO station is planned to accommodate a minimum density of 150 people/jobs per hectare. Major Transit Station Areas are expected to be planned with a diverse mix of transportive land uses including Residential. It will support a mix of multi-unit housing. However, local municipalities will have to undertake comprehensive local planning studies for MTSA's, including outlining the permitted uses in each MTSA as not all stations or

sites will achieve the same mix of land uses or intensity of development and shall have regard to The Air Quality Study conducted by Dillon Consulting Limited (Dillon) who was retained by the City of Mississauga (the City) through The Planning Partnership (TPP) concludes that air quality would not prohibit the introduction of residential development north of Royal Windsor Drive, in proximity to the Clarkson GO Station. As the Air Quality Study is complete, our design team has reviewed the results of the Air Quality Study and is currently working on a

residential development proposal that will be carried out in a manner that will account for the incorporation of design features that will facilitate the ability to have residential occupancies within the proposed development. Our client has participated in the ongoing Public Consultations with City Planning Staff, and they are aware of the need for any proposed sensitive use, such as *Residential* to align with the Air Quality Study results with regards to design considerations. We are confident that the introduction of a mixed-use proposal will uphold the integral goals and objectives of the planned new policy direction in the OPA (state which OPA). Our client and our firm will be participating in the Public Meeting for the proposed new Official Plan and its effects on the redevelopment proposal for the subject site.

It is our opinion that this proposal will also further assist the City of Mississauga to achieve its density targets and the concept will align with Provincial and Regional policy mandates and achieve the desired. Further, our client will be working on the final refinements and wishes to collaborate with Staff on any additional enhancements and considerations that must be undertaken in its design as our team finalizes the remaining components of the Proposal. We will be scheduling a pre-consultation meeting with Staff to discuss the merits of this proposal and its ability to further align with the objectives of OPA 117.

In the meantime, we ask that any further draft policy considerations as part of the Clarkson Transit Station Area Study be provided to us in advance of the final recommendations put forward to the Council. We also wish for our forthcoming Proposal to be considered for any further land use and built-form considerations as Staff finalizes their report to Staff and to provide direction on the appropriate next steps for proceeding with a development proposal being designed our client will communicate with the Municipal Staff, such as Community Planning, with regards to the initial request for to discuss the merits of this redevelopment proposal through a Pre-Application Consultation meeting which is forthcoming.

Please provide us with the notice of decision and meeting minutes following the completion of the meeting tonight.



Connecting you to the city you love.

**DANIEL TEPERMAN**  
**SENIOR DEVELOPMENT MANAGER**  
**905-851-1010 | 1-844-554-2836**

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Partners:

**Glen Broll**, MCIP, RPP

**Colin Chung**, MCIP, RPP

**Jim Levac**, MCIP, RPP

**Jason Afonso**, MCIP, RPP

**Karen Bennett**, MCIP, RPP

*In Memoriam, Founding Partner:*

**Glen Schnarr**

March 18, 2024

GSAI File: 667-001

Attention: Sharlene Bayovo, Project Lead  
Ben Philips, Project Manager

**RE: Mississauga Official Plan Review – Consolidated Draft**  
**City File: CD.02-MIS**  
**1425 Dundas Street**  
**City of Mississauga, Region of Peel**

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Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission regarding the consolidated version of City of Mississauga Official Plan (the “Official Plan”).

As staff are aware, GSAI has submitted a number of correspondences on the ongoing Official Plan review related to the above noted site. Generally, our comments encouraged the City of Mississauga to employ a certain level of flexibility in their Official Plan policies, amongst other matters and/or concerns. While we maintain our position on those matters, we are pleased to make an additional submission with specific regard to the site addressed as 1425 Dundas Street (“the site”) since the release of the consolidated Official Plan (draft). We have reiterated some comments from our previous letters herein.

We note for staff that GSAI, on behalf of the Owner, submitted a DARC Application request in the Fall of 2023. The meeting was not held as further information was requested of the applicant prior to proceeding to DARC. Notwithstanding the fact we have not resubmitted the requested materials, our intent is to proceed to a formal DARC meeting with new/updated information to advance the redevelopment of this site. We maintain our position iterated in the DARC cover letter related to the processing of the application in light of the ongoing environmental assessment dealing with flooding hazards/risks associated with the Little Etobicoke Creek. We have provided no further comment in this regard as it relates to this OP review as we are optimistic that this site can proceed independently of same as outlined in the DARC cover letter.

Our comments on the draft, consolidated MOP related to this site are focused on Chapter 5 – Housing and Chapter 11 – Transit Communities. The site is situated within the Dundas BRT Protected Major Transit Station Area (‘PMTSA’).

We have previously stated concerns with Chapter 5 related to Housing as written in the Official Plan. We acknowledge some changes from the City but continue to have concerns with Chapter 5, Housing Choices and Affordable Homes.



Specifically, the policies presented in Section 5.2:

- '5.2.2. Phased development will have a range and mix of housing types for each development phase.'*
- '5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*
- social housing or other publicly funded housing; or*
  - specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

While diversification in unit types should be encouraged, this should not be a requirement set out in the Official Plan. Policy 5.2.4 can and should be modified as follows:

*To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include ~~a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units.~~ The City may consider a lower diversification of housing types and sizes ~~reduce these percentages~~ where development is providing:*

- social housing or other publicly funded housing; or*
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'.*

Should staff choose to include a percentage in this policy, we request that the policy be amended to encourage a reduced percentage of family-sized units to be provided.

Further, we have concerns with policy 5.2.5 and Table 5.1.

- '5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>



<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

We note it is important to consider that the Regional policies were written at the Regional level (a more ‘macro’ level than City-wide) and meant to be implemented as such. Unless the City has done the analysis to understand if this model is workable, we question if it is appropriate to require these percentages on a smaller scale (City). Additionally, we feel the specificity afforded in this policy in the OP is unnecessary as the City is directed to refer to the Inclusionary Zoning By-law for the provision of affordable housing. As a reminder to staff, there are in-effect Provincial and Regional policy objectives which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. It is our opinion that the City should not be applying this requirement on a City-wide basis and rather, rely on the direction from the upper tier policy framework or in-effect legislation to utilize the Inclusionary Zoning Areas, or potentially others which may become applicable, as areas for the priority for housing affordability. The specificity of this policy appears to frustrate Provincial and Regional policy objectives of delivering a variety of housing options for current and future residents.

Conclusively, there are a number of and variety of policies scattered throughout the OP which reference the need for diversified housing stock. Further, this policy regime is handled through the Inclusionary Zoning tool already in place.

#### Chapter 11 – Transit Communities

Chapter 11 provides a policy framework that appears to be informed by the City’s previous Official Plan Amendments 143 and 144 which are discussed in our previous submissions. We note that the inclusion of MTSA policies may be premature as informed by OPA 143 and 144 considering these amendments are still subject to the Region of Peel approval and as such, not yet in full force and effect.

Section 11.3 discusses Land Uses. Policy 11.3.2 regarding the replacement of non-residential gross floor area is problematic. Policy 11.3.2 reads:

*Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment.*

We have previously been advised that this site will take on a Mixed Use Limited land use designation. In this respect, we are seeking clarity on the language used in the policy cited above. It is not clear if the City is requiring a 1:1 replacement ratio of non-residential gross floor area or if the quality of the non-residential uses are to be sufficient to continue to service the area (resolved through a Market Study or otherwise). In the event that the City is requiring a 1:1 replacement ratio, we submit that this is inappropriate and provides



issues for infill development within MTSAs and does not represent a logical response to market demands/trends. Larger format non-residential uses (including retail plazas etc) are being replaced by mixed use developments which provide a better use of space in strategic areas. Requiring a 1:1 replacement in these areas would in some cases, render a mixed-use development not feasible and thus preclude the MTSA's from developing as they were intended through Provincial, Regional and even local policies. We caution staff on adopting a policy that would put at risk the planned function of MTSAs, such as this one. This policy does not take into account market needs and ultimately will result in the continued underutilization of lands and commercial vacancies. This policy may be more appropriately written as:

*Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, ~~will not be permitted unless it can be~~ shall be required to demonstrate that the planned function of the non-residential component will be maintained or ~~replaced as part of the redevelopment.~~ that the replacement non-residential GFA is satisfactory to continue to service the area or community.*

The intent of the proposed revision to the above-noted policy is to state that the provision of a variety of non-residential uses should be encouraged in a new development, rather than requiring non-residential area replacement.

We thank staff for the opportunity to provide comments on the draft consolidated Official Plan.

**GLEN SCHNARR & ASSOCIATES INC.**

  
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**Sarah Clark, MCIP, RPP**  
**Associate**

## Mississauga Official Plan 2051 - Comment Matrix

Date	Organization/Entity/Department	Name	Chapter/Section/Policy	Comment/Question	Mississauga - Staff Response
March 4/24	CVC	D. Di Berto	4.3.15.g	It appears as though this policy is leading into offsetting although it is unclear. Suggest making offsetting the intent of this policy and revising to be more explicit by stating that development within the NHS is discouraged but should it occur, then offsetting is expected.	
March 4/24	CVC	D. Di Berto	4.3.1.6	CVC staff support this policy and further recommend that no new lot creation is permitted within Natural Hazard Lands as well and that this is explicitly stated to avoid future proposed development scenarios where this can occur.	
March 4/24	CVC	D. Di Berto	4.3.1.7	Suggest including wetlands as well, not only PSW/coastal wetlands.	
				CVC staff caution the City in this policy as the PPS prohibits development within PSWs. Although trails have been placed within PSWs, they are in the form of a boardwalk with very minimal impact and intrusion. Suggest removing the term trail and/or replacing with boardwalk.	
March 4/24	CVC	D. Di Berto	4.3.3.24	Suggest adding that safe access must be available to sites that development is proposed for.	
March 19/24	CVC	D. Di Berto	4.2.12	This is a good opportunity to speak to offsetting losses incurred by the City themselves through infrastructure projects. Consider adding in a clause that requires compensation for unavoidable losses when on City-owned land. Also, this section speaks to planting however also suggest adding wording that discourages tree removal but promotes offsetting as applicable.	6.5



March 19/24	CVC		D. Di Berto	4.3 Diagram	The diagram is confusing. What is meant by untreated valleylands, etc? Also, watercourses should be included within the hazard sphere if this diagram is to be used.	
March 19/24	CVC		D. Di Berto	4.3.1.5	There is an opportunity here to promote a Woodland and Wetland Management Plan when applicable, for lands deeded to the City as part of the NHS.	
March 19/24	CVC		D. Di Berto	4.3.1.29	Where the residential woodland also forms part of the natural hazard regulated by the CA, the CA's offsetting requirements may exceed the requirements determined by the City.	
March 19/24	CVC		D. Di Berto	4.3.3.	Consider including wetlands and unstable soils as natural hazards as well (consistent with CA Act requirements).	
March 19/24	CVC		D. Di Berto	4.3.3.11	This is the first time ESC requirements are introduced. Suggest adding this policy in earlier sections related to protection of natural hazards and features.	
March 19/24	CVC		D. Di Berto	4.3.3.15	It is unclear as to what this policy means and what the intent is. If the direction is to ensure development is located outside of a hazard associated with a watercourse this should be more clearly stated (i.e. development should not occur within a watercourse and its associated hazards (flooding, erosion, unstable soil etc.). Suggest revising to clearly state the intent.	
March 19/24	CVC		D. Di Berto	4.3.3.16	Note that typically development in proximity to a watercourse will likely be regulated by the CA and as such reference to approval from the CA should also be included.	
						6.5

Dear Deputy Mayor, Council and Planning and Development Committee,

For those that do not remember me or are new to Council, I am Joe Amato of 5644 Ninth Line. I appreciate you making the time today to hear my deputation.

Brief history. Prior to annexation of the Ninth Line Corridor by Mississauga, Mississauga's representatives (including its Councillors) promised the landowners of the Ninth Line owners Association/Corridor that our land would become developable once we joined Mississauga if we did not oppose annexation at the OMB. We did not oppose the annexation. Post annexation, and on updating of the Region of Peels Official Plan soon thereafter, it became very clear that such promise was not going to be extended to three properties only of the countless number of properties in the Ninth Line corridor that were redesignated to permit development. As you have already guessed, I am one of those 3 properties that was not included in those that were promised to be developable.

On my deputation to Council on July 4, 2018, Councillor Saito (and this is all available in the minutes) was held to account, by me, on that original promise and was sympathetic and wondered aloud why these three properties were excluded and treated unfairly (and spoke to how something could be done, and that there is always a way to engineer around Flood Lines, and that the Planning Department should take another close look). She also referenced an area in her ward that had gone through something similar and were able to engineer around it. Mayor Crombie chimed in and, with respect to a point I made, had concerns and asked the commissioner Planner Andrew Whittmore why the houses on the east side of Ninth Line were built in a flood zone. She also asked Mr. Whittmore if down the road changes were made, could something be done for these properties. Mr. Whittmore's response was 'yes'. Councillor Sue McFadden, who I believe is away today, also said that we were treated unfairly and reiterated Councillor Saito's sentiments. Sue has been very open to listening to my issues ever since.

So it is that I stand here in front of you again today (6 years later) to ask you, at this opportune time (re: this update to Mississauga's Official Plan (the "MOP")) to fix the inequity and to fulfil your promise originally made to me prior to annexation. The ask, not to be confused with Conservation Halton's designation of my property (a fight for another day and which I will address in a couple of minutes), is that this group interpret and adjust the MOP to designate 5644 Ninth Line as Residential Low Density 1 (4-10 storeys) ("RLD1") in Precinct 4. I believe this is fair and completely in line with (i) the *More Homes Built Faster Act of Ontario* (the "MHBFA"), (ii) Canada's very well documented shortage of housing, and (iii) the spirit of your own newly proposed MOP, by its own terms, which I now wish to draw your attention to:

1. In the cover letter to the MOP dated March 6<sup>th</sup> and titled 'Corporate Report', the Executive Summary of the MOP therein, and the summary of key changes outlined therein, focussed on the following in clauses 1, 2, 4 and 8:
  - a. Clause 1 – I quote "*Eliminate barriers to housing and increasing housing opportunities*", that includes "*housing options and affordable housing close*

*to transit*". I wish to point out here and, as reiterated below (as found in another section of the MOP), that my property is immediately adjacent (southside) to the 407 proposed station on Ninth Line. Sorry, to repeat, **immediately adjacent** to the south ... there is no other property between us. Immediately adjacent to the north of the station, you designated those properties (owned by a developer) as mixed use (4-10 stories);

- b. Clause 1 -- I quote "*Housing unit targets for affordable, rental and diverse housing*". My plan is to build a 10 storey rental apartment;
  - c. Clause 2 – I quote "*Complete communities near transit stations*" "*support complete communities within a 10 minute walk*" – the proposed use for my rental housing development would be a 2-4 minute walk;
  - d. Clause 4 – I quote "*permit small scale stores on lands designated RLD1*" "*uses that are important to provide much needed services such as access to healthy food, healthcare support,*" etc. First level retail space in my rental housing development would encourage same; and
  - e. Clause 8 "*Social Inclusion and Diversity*" "*providing housing that meets the needs of individuals of all ages, incomes and abilities*". Which the rental building I will be proposing would accommodate;
2. MOP Section 12.1.3.1 – per this section, it is imperative that this committee designate my property RLD1 in this process, now, prior to the MOP coming into effect ... avoiding costly appeals processes;
  3. MOP Section 13.1 – Interestingly, and as an aside, with such a focus on the Nodes being placed specifically adjacent to the Transit Stations, why were the 407 Transit Way station surrounding properties not designated as a Node?;
  4. MOP Section 14.13 - Ninth Line Neighbourhood:
    - a. 14.13.2.2 – to highlight and understand the context of this deputation, I must quote the whole subsection, "*The Ninth Line Neighbourhood Character Area, is intended to accommodate a variety of medium and high density housing, employment uses, and an extensive open space network. The planned 407 Transitway runs through the area in a north/south direction. [Emphasis added] Higher density development will be focused around the two **Major Transit Station Areas** [bolded in the original text of the MOP] located at Britannia Road West and Derry Road West.*". Folks, I submit, why was my property left out when it completely fulfills the wishes of the MOP as a property immediately adjacent to a transit station?;
    - b. 14.13.3.11 – Precinct 4 is defined as, and I quote "*This area immediately surrounds the Britannia 407 Transitway Station. Development will be transit-supportive with a range of building heights from 4 to 10 storeys. Sites **immediately adjacent** [Emphasis added] to the 407 Transitway Station will incorporate retail/commercial uses at grade to enable a vibrant and active public realm. Buildings will be designed to accommodate retail/commercial uses at grade.*". Folks, "**immediately adjacent**" is 5644 Ninth Line; and
    - c. 14.13.2.15 (Reference Maps M1-M3). This section prescribes that, and I quote, "*once the 407 Transitway is finalized, lands no longer required for*

*the Transitway may be removed from the Parkway Belt West Plan ("PBWP") through amendment to the PBWP. Once the PBWP is amended, the land use designations shown on Reference Maps (M1-M3) will come into force and effect, without further amendment to this Plan."*

Folks, this section makes it clear that my property is scheduled to exit the PBWP. I firstly put to you that it should not have been placed in the PBWP originally without the same designation as the property north of the station was given. I implore you to remove my property now from PBWP and designate it as RLD1, or, at the least, designate it RLD1 so that once removed from the PBWP, we have the opportunity to develop a rental apartment unit with retail space on the ground level that is clearly in line with the terms and spirit of the MOP; and

5. Schedules 7 & 8 to the MOP – I draw your attention to the fact that in both diagrams, it is my property that is, I put forth, discriminately excluded from the 'Protected Major Transit Station Area' and the 'mixed use' designation by a cut out chunk on the South East side of the highlighted areas ... almost as if to be thumbing its nose at me!

In addition to this submission and my years of work to begin to consider ways to have my property given its due, I have been in communications with Conservation Halton ... and my team and I plan to continue to work with Conservation Halton. As you may know, the MHBFA amends the *Conservation Authorities Act* (Ontario) that now permits you to override their authority and designate properties (with certain conditions) that you believe should be developable and authorize same under the *Planning Act* (Ontario). We want to work with you and Conservation Halton to develop the property while trying to respect the stormwater management plan that we believe was conducted for the 407 transit way and to allay other concerns. Please, use your authority granted by the MHBFA to bring them closer to the table.

In conclusion, I am asking you to fulfill your promise made to me prior to annexation and to work within the obvious terms and spirit of the new MOP and designate my property (currently in Precinct 4) as RLD1 4-10 stories. Folks, this is not a pie in the sky or big stretch ask... this is what you want by your own words in the MOP. I submit, my property should not have remained or been designated as Greenlands or Natural Hazards discriminately while others were removed. A pure injustice that only you can fix.

I remain yours, respectfully,

Joe Amato  
5644 Ninth Line

**From:** [Ben Phillips](#)  
**To:** [Amina Menkad](#); [Courtney Plato](#)  
**Subject:** FW: Written Submissions: Dunpar Developments Inc. - Preliminary Comments regarding the Mississauga Official Plan 2051 - MAR-18-2024  
**Date:** Wednesday, March 20, 2024 10:48:03 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Hi – more comments per below.

Thanks, Ben

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**From:** Angie Melo <[Angie.Melo@mississauga.ca](mailto:Angie.Melo@mississauga.ca)>  
**Sent:** Wednesday, March 20, 2024 10:04 AM  
**To:** Andrew Whittemore <[Andrew.Whittemore@mississauga.ca](mailto:Andrew.Whittemore@mississauga.ca)>; Ben Phillips <[Ben.Phillips@mississauga.ca](mailto:Ben.Phillips@mississauga.ca)>; Jason Bevan <[Jason.Bevan@mississauga.ca](mailto:Jason.Bevan@mississauga.ca)>  
**Subject:** Written Submissions: Dunpar Developments Inc. - Preliminary Comments regarding the Mississauga Official Plan 2051 - MAR-18-2024



**Angie Melo**

Legislative Coordinator  
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[City of Mississauga](#) | Corporate Services Department,  
Legislative Services

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**From:** Michael Nemanic <[m.nemanic@dunpar.ca](mailto:m.nemanic@dunpar.ca)>  
**Sent:** Monday, March 18, 2024 6:54 PM  
**To:** Deputations Presentations <[Deputations.Presentations@mississauga.ca](mailto:Deputations.Presentations@mississauga.ca)>; Angie Melo <[Angie.Melo@mississauga.ca](mailto:Angie.Melo@mississauga.ca)>  
**Cc:** Giouz Mutlu <[g.mutlu@dunpar.ca](mailto:g.mutlu@dunpar.ca)>; Luke Johnston <[l.johnston@dunpar.ca](mailto:l.johnston@dunpar.ca)>  
**Subject:** [EXTERNAL] Dunpar Developments Inc. - Preliminary Comments regarding the Mississauga Official Plan 2051 - MAR-18-2024

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Hello –

The purpose of this correspondence is to provide the preliminary comments of Dunpar Developments Inc. (“**Dunpar**”) regarding the Mississauga Official Plan 2051 (the “**New OP**”) as compared to the current Mississauga Official Plan (the “**Old OP**”). These preliminary comments are as follows:

- A.** Chapter 4 of the New OP introduces new policies related to Brownfield Sites (policy 4.10.1) which purports to introduce onerous policies related to environmental remediation. These policies appear to be both duplicative of the Record of Site Condition process under the Environmental Protection Act while also appearing to have a substantially broader scope. For example, conforming to the direction that “landowners will consider all potential sources of contamination” outside the Table requirements of the EPA would be unworkable.
- B.** Chapter 5 of the New OP introduces new policies related to residential rental conversions (policies 5.3.4.3 to 5.3.4.7) which restrict the demolition or conversion of residential rental units to any other form of tenure in properties with six or more dwelling units. As written, these policies include requirements which exceed the City’s authority under the Planning Act, including a direction that “[s]imilar rents are defined as the last rent paid by the tenant.”
- C.** Chapter 10 of the New OP includes a range of amended general land designation policies. When compared to the Old OP, these policies are more restrictive. For example, the New OP has created a “height benchmark” for the Residential High-Rise land designation (policy 10.2.5.10); the New OP will limit the height of mid-rise buildings in the Residential Mid-Rise land designation to a maximum of 8-storeys (policy 10.2.5.9); and the New OP will require 1-to-1 non-residential floor space replacement for Mixed Use redevelopment (policy 10.2.6.3).

Thank you for accepting receipt of these preliminary comments. Dunpar looks forward to providing the City with more fulsome correspondence in the coming weeks.

Sincerely,

Michael Nemanic  
Legal Counsel & Development Management

**D**

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March 28, 2024

CFN 69687

**BY E-MAIL ONLY** ([official.plan@mississauga.ca](mailto:official.plan@mississauga.ca))

Sharleen Bayovo  
Official Plan Review – City of Mississauga  
Planner, P&B/ Official Plan Review  
300 City Centre Drive  
Mississauga, ON L5B 3C1

**Re: Final Draft Mississauga Official Plan – February 2024**

Thank you for engaging Toronto and Region Conservation Authority (TRCA) in the review of the most recent draft of the City of Mississauga's Official Plan (OP). We understand that the OP review is in the final phase of community engagement and the City has hosted virtual and in person public meetings. We provide these comments in accordance with the Conservation Authorities Act and associated regulations.

**COMMENTS**

We appreciate the City's efforts to incorporate some of our previous recommendations provided on August 21, 2023, on the Mississauga Official Plan Review Bundle 3. Given that some of our previous comments were not addressed, however, below we have reiterated them and provided some new comments. We have also included our comments in the attached comment matrix as requested by the City. Please note that we are in receipt of Credit Valley Conservation Authority's comments on the latest draft OP and support those comments, with the exception of Policy 4.3.1.9, for which we have an independent comment below.

**Chapter 4 – Sustaining the Natural Environment**

1. Consider removing the term "trails" from Policy 4.3.1.9 given that trails in any form are not necessarily a form of passive recreation, especially if proposed within a wetland.
2. In Policy 4.3.8, consider revising so that buffer widths to non-provincially significant wetlands are not just limited to 10 metres. We provide this comment since within TRCA's jurisdiction the majority of wetlands in the City are non-provincially significant wetlands yet may still be important for natural hazard management; in this case, a buffer width of greater than 10 metres may be warranted where possible.

**Chapter 5 – Housing Choices and Affordable Homes**

3. There are no policies contained within Chapter 5 stating that additional residential units must avoid locating within natural hazards and/or on natural hazard lands. Please add a policy to Section 5 stating that housing development and intensification through various housing options, including additional residential units, will be planned outside of natural hazards. In this regard, we note that Policy 5.3.2.5 permits additional residential units in a principal residence. TRCA's concern is that a principal dwelling unit with this permission may be located within hazardous lands and the additional unit (or units) would be increasing risk to people and property.

## Chapter 10 – Land Use Designations

4. Policy 10.2.2.2 states utility uses are not permitted on lands identified as Provincially Significant Wetlands (PSW). While TRCA appreciates prohibiting the development and/or site alteration within a PSW, please also add that utility uses avoid natural hazards and/or natural hazard lands and other wetlands except where they may need to be permitted subject to the satisfaction of the City and the conservation authority.
5. Policy 10.2.2.3 states that, *“When public works not subject to the Environmental Assessment Act are planned to traverse, coincide with, or otherwise affect the Natural Heritage System, an acceptable assessment such as an Environmental Impact Study will be required to be submitted to and approved by the City and the appropriate conservation authority.”* In addition to public works traversing, coinciding with, or affecting the Natural Heritage System, we recommend including natural hazards and/or natural hazard lands to align with the definition of Environmental Impact Study (EIS) contained in the Glossary of the OP. Further, please continue to include reference to review by “the appropriate conservation authority” to ensure the potential for impacts with respect to natural hazards can be addressed, along with CA regulated features contributing to natural hazard management (e.g., wetlands, valleylands, watercourses, shorelines).
6. There are no policies contained within Chapter 10 that speak to setbacks from natural hazard lands or from features important for natural hazard management, e.g., wetlands, valleylands, shorelines. We recommend including a policy on appropriate setbacks/buffers from features and natural hazards within Section 10.2.3 Greenlands.
7. To align with Section 3.1 of the Provincial Policy Statement (PPS), Policy 10.2.3.8 should be revised to include erosion hazards and slope instability or use the term hazardous lands and hazardous sites to capture both flood and erosion hazards. In addition to hazard lands associated with a valley and watercourse corridor, please also add wetlands and shorelines.
8. Further to our comments above on housing (chapter 5) and section 10.2.3.8 on of the OP, chapter 10 proposes several new permissions for additional residential units through various housing types. Please add a policy for prohibiting development, including additional residential units, from locating within hazardous lands and hazardous sites. This is to avoid increasing risk by adding additional units in already flood prone or erosion prone areas. These policies should exclude the provincially approved SPA and Two Zone areas of the City, for which the provincially approved policies of the OP prevail.

## Chapter 11 – Major Transit Station Areas (MTSA)

9. We understand that Chapter 11 MTSA policies are under appeal. Should there be an opportunity to add policies, please clarify, that notwithstanding policy 11.2.6, the PPS direction is that development and site alteration are not permitted within hazardous lands and hazardous sites and include reference to the conservation authority to ensure that City-initiated flood studies, mitigation, and remediation requirements are to the satisfaction of the City and the conservation authority.

## Chapter 14 – Neighbourhoods

10. Policy 14.9.2.7 applies to the Two Zone Concept area within the Mimico Creek watershed. Should the City wish to update this section, TRCA would be pleased to participate in accordance with provincial procedures and MNRF staff approval process. Given the February 2024 release of the new provincial regulation for all CAs (effective April 1, 2024) this wording should be changed to “approval pursuant to section 28 of the Conservation Authorities Act”.

## SCHEDULES AND MAPPING

11. For Schedule 2, as part of the development of the Etobicoke Creek Watershed Plan (ECWP) (still in draft), natural system mapping was completed in collaboration with the ECWP Steering Committee including City of Mississauga staff. The mapping/data layers for the watershed can be provided upon request.

## GLOSSARY

12. Valley and Stream Corridor – We recommend continuing to reference the appropriate conservation authority within the term's definition given the role of conservation authorities in identifying the location and extent of hazardous lands and hazardous sites.

We trust these comments to be clear and of assistance. Should you have any questions or wish to meet to discuss any of the above, please contact the undersigned at [maryann.burns@trca.ca](mailto:maryann.burns@trca.ca).

Sincerely,



Mary-Ann Burns, MCIP RPP  
Senior Manager, Planning Policy and Regulation

cc: Amina Menkad, Planner, P&B/Official Plan Review, City of Mississauga  
Brandon Williams, City Planning Strategies, City of Mississauga  
Dorothy DiBerto, Senior Manager, Planning & Development Services, Credit Valley Conservation  
Laurie Nelson, Director, Policy Planning, TRCA  
Colleen Bonner, Senior Planner, Development Planning and Permits, TRCA

Attachment: Mississauga Official Plan 2051 – Comment Matrix



## Mississauga Official Plan 2051 - Comment Matrix

Date	Organization/Entity/Department	Name	Chapter/Section/Policy	Comment/Question	Mississauga - Staff Response
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Policy 4.3.1.9	Consider removing the term "trails" from Policy 4.3.1.9 given that trails in any form are not necessarily a form of passive recreation, especially if proposed within a wetland.	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Policy 4.3.8	In Policy 4.3.8, consider revising so that buffer widths to non-provincially significant wetlands are not just limited to 10 metres. We provide this comment since within TRCA's jurisdiction the majority of wetlands in the City are non-provincially significant wetlands yet may still be important for natural hazard management; in this case, a buffer width of greater than 10 metres may be warranted where possible.	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Chapter 5	There are no policies contained within Chapter 5 stating that additional residential units must avoid locating within natural hazards and/or on natural hazard lands. Please add a policy to Section 5 stating that housing development and intensification through various housing options, including additional residential units, will be planned outside of natural hazards. In this regard, we note that Policy 5.3.2.5 permits additional residential units in a principal residence. TRCA's concern is that a principal dwelling unit with this permission may be located within hazardous lands and the additional unit (or units) would be increasing risk to people and property.	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Policy 10.2.2.2	Policy 10.2.2.2 states utility uses are not permitted on lands identified as Provincially Significant Wetlands (PSW). While TRCA appreciates prohibiting the development and/or site alteration within a PSW, please also add that utility uses avoid natural hazards and/or natural hazard lands and other wetlands except where they may need to be permitted subject to the satisfaction of the City and the conservation authority.	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Policy 10.2.2.3	Policy 10.2.2.3 states that, "When public works not subject to the Environmental Assessment Act are planned to traverse, coincide with, or otherwise affect the Natural Heritage System, an acceptable assessment such as an Environmental Impact Study will be required to be submitted to and approved by the City and the appropriate conservation authority." In addition to public works traversing, coinciding with, or affecting the Natural Heritage System, we recommend including natural hazards and/or natural hazard lands to align with the definition of Environmental Impact Study (EIS) contained in the Glossary of the OP. Further, please continue to include reference to review by "the appropriate conservation authority" to ensure the potential for impacts with respect to natural hazards can be addressed, along with CA regulated features contributing to natural hazard management (e.g., wetlands, valleylands, watercourses, shorelines).	

Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Section 10.2.3	There are no policies contained within Chapter 10 that speak to setbacks from natural hazard lands or from features important for natural hazard management, e.g., wetlands, valleylands, shorelines. We recommend including a policy on appropriate setbacks/buffers from features and natural hazards within Section 10.2.3	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Policy 10.2.3.8	<u>Greenlands</u> To align with Section 3.1 of the Provincial Policy Statement (PPS), Policy 10.2.3.8 should be revised to include erosion hazards and slope instability or use the term hazardous lands and hazardous sites to capture both flood and erosion hazards. In addition to hazard lands associated with a valley and watercourse corridor, please also add <u>wetlands and shorelines</u>	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Chapter 10	Further to our comments above on housing (chapter 5) and section 10.1.3.8 of the OP, chapter 10 proposes several new permissions for additional residential units through various housing types. Please add a policy for prohibiting development, including additional residential units, from locating within hazardous lands and hazardous sites. This is to avoid increasing risk by adding additional units in already flood prone or erosion prone areas. These policies should exclude the provincially approved SPA and Two Zone areas of the City, for which the provincially approved policies of the OP prevail.	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Chapter 11	We understand that Chapter 11 MTSA policies are under appeal. Should there be an opportunity to add policies, please clarify, that notwithstanding policy 11.2.6, the PPS direction is that development and site alteration are not permitted within hazardous lands and hazardous sites and include reference to the (applicable) conservation authority to ensure that City-initiated flood studies, mitigation, and remediation requirements are to the satisfaction of the City and the conservation authority.	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Policy 14.9.2.7	Policy 14.9.2.7 applies to the Two Zone Concept area within the Mimico Creek watershed. Should the City wish to update this section, TRCA would be pleased to participate in accordance with provincial procedures and MNRF staff approval process. Given the February 2024 release of the new provincial regulation for all CAs (effective April 1, 2024) this wording should be changed to "approval pursuant to section 28 of the Conservation Authorities Act".	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Schedule 2	For Schedule 2, as part of the development of the Etobicoke Creek Watershed Plan (ECWP) (still in draft), natural system mapping was completed in collaboration with the ECWP Steering Committee including City of Mississauga staff. The mapping/data layers for the watershed can be provided upon request.	
Thursday, March 21, 2024	TRCA	Mary-Ann Burns	Glossary - Valley and Stream Watercourse Corridors	Valley and Stream Corridor – We recommend continuing to reference the appropriate conservation authority within the term's definition given the role of conservation authorities in identifying the location and extent of hazardous lands and hazardous sites.	



Authorized commenting Agency for



May 14, 2024

Sharleen Bayovo, Project Lead  
Ben Phillips, Project Manager

City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

Via email: [official.plan@mississauga.ca](mailto:official.plan@mississauga.ca)

Dear Sharleen Bayovo and Ben Phillips:

**RE: Official Plan Review**  
**City of Mississauga**  
MHBC File: PAR 50060

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MacNaughton Hermesen Britton Clarkson (MHBC) are the planning consultants for TransCanada PipeLines Limited (TCPL). This letter is in response to the proposed Mississauga Official Plan 2051 presented at the Planning and Development Committee on March 18, 2024. TCPL has two (2) high-pressure natural gas pipelines and associated facilities contained within a right-of-way ("easement") crossing the City of Mississauga.

TCPL's pipelines and related facilities are subject to the jurisdiction of the Canada Energy Regulator (CER) – formerly the National Energy Board (NEB). As such, certain activities must comply with the Canadian Energy Regulator Act ("Act") and associated Regulations. The Act and the Regulations noted can be accessed from the CER's website at [www.cer-rec.gc.ca](http://www.cer-rec.gc.ca).

### ***Policy Context***

In accordance with Section 2(o) of the *Planning Act*, municipalities shall have regard for matters of provincial interest, including the protection of public health and safety. TCPL's pipelines are defined as Infrastructure in the Provincial Policy Statement (PPS). Section 1.6.8.1 of the PPS states that '*planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit and electricity generation facilities and transmission systems to meet current and projected needs.*' The Growth Plan (2020) also references the importance of protecting and maintaining planned infrastructure to support growth in Ontario.

Appropriate setbacks of buildings, structures and dwellings to the rights-of-way are needed to manage the safety and integrity of the pipelines, as well as ensuring adequate access for emergencies, operations and maintenance. Where possible, TCPL also seeks to implement official plan policies and zoning regulations that implement its guidelines.

Policies related to TCPL are included in Section 17.19 of the proposed Official Plan:

*17.19.7 Setbacks of a residence, place of work, or public assembly to an oil or gas easement or associated structure, and an appropriate building design, will be determined based on the type of pipeline, stress level of the pipeline and shall take into consideration the Guidelines for Development in the Vicinity of Oil and Gas Pipeline Facilities, prepared by the Technical Standards & Safety Authority.*

*17.19.8 Existing or new easements accommodating gas and/or oil pipelines should be incorporated into development plans as public open space, walkways or bicycle paths, but not be incorporated into individual lots. In some cases, in consultation with the pipeline operator, certain other uses such as vehicle parking, may be considered if it forms an integral part of the development*

Further to our comments provided on the draft Official Plan in February 2024 (attached), the above-noted policies in the proposed Official Plan do not accurately capture the development and regulatory requirements of TCPL. For example, the *Guidelines for Development in the Vicinity of Oil and Gas Pipeline Facilities* do not apply to TCPL, as TCPL is federally-regulated by the CER and not under the Technical Standards & Safety Authority (TSSA). In addition, vehicle parking is not permitted within TCPL's right-of-way, whether or not it forms an integral part of the development.

TCPL strongly recommends that the City of Mississauga include TCPL's development and regulatory requirements in the Official Plan for the following reasons:

- a) **Public Safety:** it is a common and vested interest between the City of Mississauga and TCPL to uphold public safety as a priority. The inclusion of TCPL's Written Consent requirements for activities within 30 metres of the pipeline(s), code obligations for development within 200 metres of the pipeline(s) and minimum setbacks serve as damage prevention buffers from pipeline(s), thereby protecting the public from incidents.
- b) **Efficiency:** TCPL enforces damage prevention requirements through the Written Consent process. In the event that TCPL's requirements are not included within the Official Plan policies, planning applications may need to be resubmitted to the City if the plans do not comply with TCPL's requirements. In addition, awareness of TCPL's pre-consultation requirements for development within 200 metres of the pipeline(s) allows TCPL to proactively plan for pipe replacements – a multi-year process – to minimize impacts to development timelines. Including TCPL's requirements in the City's Official Plan creates efficiencies in reducing resubmissions, supporting the City's development goals.
- c) **Transparency:** public awareness of TCPL's requirements through Official Plans creates transparency in the process of development and land-use changes. The inclusion of TCPL's development requirements and setbacks is in the public's best interest.
- d) **Operations & Maintenance:** appropriate setbacks of permanent and accessory structures to TCPL's the rights-of-way are needed to manage the safety and integrity of the pipelines, as well as ensuring adequate access for emergencies, operations and maintenance in accordance with national regulations.

As such, for greater clarity regarding TCPL's requirements that are specific to TCPL, we request that a new policy 17.19.10 be added to the Official Plan as follows:

*17.19.10 TRANSCANADA PIPELINES LIMITED (TCPL)*

- 1. TransCanada Pipelines Limited ("TCPL") operates high pressure natural gas pipelines within its rights-of-way which cross through the City of Mississauga as identified on Schedule 1 to this Plan.*

2. *TCPL is regulated by the Canada Energy Regulator ("CER"), which has a number of requirements regulating development in proximity to the pipelines, including approval for activities within 30 metres of the pipeline centreline.*
3. *New development can result in increasing the population density in the area, and may result in TCPL being required to replace its pipeline to comply with CSA Code Z662. Therefore, the City shall require early consultation with TCPL for any development proposals within 200 metres of its facilities.*
4. *A setback of 7 metres shall be maintained from the limits of the right-of-way for all permanent buildings and structures. Accessory structures shall have a minimum setback of at least 3 metres from the limit of the right-of-way.*
5. *A minimum setback of 7 metres shall be maintained from the limits of the right-of-way for any parking area or loading area, including parking, loading, stacking and bicycle parking spaces, and any associated aisle or driveway.*
6. *In the Urban System, the City will encourage the use of TCPL's right-of-way for passive parkland or open space subject to TCPL's easement rights.*

We request the Official Plan show TCPL's pipelines on Schedules 1 and 7. We can provide GIS shape files of TCPL's Prescribed Area to the municipality; however a confidentiality agreement will need to be entered into prior to releasing the files. Please let us know if you would be interested in this option.

Thank you for the opportunity to comment. **We request that the project team provide a written response to our comments before the proposed Official Plan is brought forward for approval.** If you have any questions, please do not hesitate to contact our office at [TCEnergy@mhbcplan.com](mailto:TCEnergy@mhbcplan.com).

Sincerely,

**MHBC**



Kaitlin Webber, MA  
Planner | MHBC Planning

*on behalf of TransCanada PipeLines Limited*



Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

June 28, 2024

GSAI File: 1468 – 001

(Via Email)

Mr. Ben Philips

Project Manager, Official Plan Review

City of Mississauga

Planning &amp; Building Department

City Planning Services Division

300 City Centre Drive

Mississauga, ON L3B 3C1

RE:      **Mississauga Official Plan 2051**  
          **KJC Properties Inc.**  
          **805 Dundas Street East, City of Mississauga**

Glen Schnarr and Associates Inc (GSAI) are the planning consultants to KJC Properties Inc. (the "Owner") of the lands municipally known as 805 Dundas Street East, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the north side of Dundas Street East, west of Haines Road. The Site is currently occupied by a retail plaza comprised of low-rise, multi-tenant commercial structures, a detached commercial structure and surface parking areas. Based on the in-effect planning policy framework, the Site is located within the Applewood Neighbourhood Character Area, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the Cawthra Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Residential High Density' (in accordance with Mississauga Official Plan Amendment 169). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, mixed-use, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being immediately adjacent to the Dundas Bus Rapid Transit ('BRT') network and within 300 metres of various street-level transit services. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Applewood as a vibrant, complete, 15-minute community.

By way of background, we highlight that the Subject Lands are subject to an active development approval. More specifically, in April 2024, City Council approved the site-specific Official Plan Amendment and Zoning By-law Amendment application for the Subject Lands. This approval culminated Official Plan Amendment 169 and By-law 0058-2024.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

In accordance with the in-effect Provincial and Regional policy frameworks, the Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area. We support the identification and policy directions identified for Strategic Growth Areas, which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, thereby removing reference to housing type.

'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:

- social housing or other publicly funded housing; or
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased to a 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase "encouraged". The re-phrasing and use of the word "encourage" is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain unit type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the economic and efficient delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'

Table 5.1 – Peel-Wide New Housing Unit Targets

Target Area	Targets
Affordability	That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households
Rental	That 25% of all new housing units are rental tenure
Density	That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted

nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. It can also challenge the implementation of development, particularly when development fronts onto private streets which often have reduced ROW widths. For the reasons outlined above, this policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods*

*including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. In our opinion, the 45 degree angular plane requirement should be removed from the above-noted policy.

#### Chapter 10: Land Use Designations

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated.

In the case of the Subject Lands, Schedule 7 identifies the Subject Lands as being designated 'Mixed Use'. This designation is inconsistent with the designation applied to the Site via Mississauga Official Plan Amendment 169. We request that the Site's correct 'Residential High Density' designation as established by Mississauga Official Plan Amendment 169 be reflected.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10 and Schedule 7. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 142, 143 and 144. We highlight that OPA 142, 143 and 144 were modified and subsequently approved by Peel Regional Council on April 11, 2024. The approved and now in-force policy framework includes refinements to policy permissions, land use designations and specified maximum building heights. Overall, the draft Chapter 11 policies as presented are concerning.

In accordance with Schedule 8g, the Subject Lands are identified as being located within the Cawthra Protected Major Transit Station Area (PMTSA), as being designated 'Mixed Use' and as having a maximum building height permission of 12 storeys. While we support the inclusion of the Subject Lands within the Cawthra PMTSA given the Site's locational attributes, the discrepancy in land use designations is concerning. Furthermore, the absence of a policy framework outlining evaluation criteria to permit building height above and beyond that specified by Schedule 8 is concerning and requires modification.





### Conclusion

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

Glen Broll, MCIP, RPP  
**Managing Partner**

Stephanie Matveeva, MCIP, RPP  
Associate

cc. Owner  
Councillor Fonseca  
Bashar Al-Hussaini, Policy Planner

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

June 12, 2024

GSAI File: 1484 – 004

(Via Email)

Mr. Ben Phillips

Project Manager, Official Plan Review

City of Mississauga

Planning &amp; Building Department

City Planning Services Division

300 City Centre Drive

Mississauga, ON L3B 3C1

RE:      **Mississauga Official Plan 2051**  
          **Starmont Estates Inc.**  
          **2555 Erin Centre Boulevard, City of Mississauga**

Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to Starmont Estates Inc. (the 'Owner') of the lands municipally known as 2555 Erin Centre Boulevard, in the City of Mississauga. On behalf of the Owner and further to the Comment Letter, dated March 15, 2024, we are pleased to be providing this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the north side of Erin Centre Boulevard, east of Erin Mills Parkway. It is currently improved with a local retail plaza comprised of a low-rise multi-tenant commercial structure and surface parking areas. Based on the in-effect planning policy framework, the Subject Lands are located within the Central Erin Mills Neighbourhood Character Area, is immediately adjacent to the Central Erin Mills Major Node Character Area (in accordance with Schedule 9, Character Areas, Mississauga Official Plan and as shown in the **Aerial Context** image on the next page), and is designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above and the surrounding context, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Site as an appropriate and desirable location for higher density, compact development to occur. This is strengthened by the Site's locational characteristics of being immediately adjacent to and within 300 metres of various street-level transit services, the Mississauga Transitway network and the Erin Mills Bus Terminal facility. Additionally, the Site is located within walking distance of various services, amenities, facilities, schools, parks and greenspaces to meet the daily needs of residents and support Central Erin Mills as a vibrant, complete, 15-minute community.



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## AERIAL CONTEXT PLAN

CITY OF MISSISSAUGA

### LEGEND

-  Subject Lands
-  Central Erin Mills Major Node Character Area

2555 ERIN CENTRE BOULEVARD,  
BLOCK 116, PLAN 43M856  
CITY OF MISSISSAUGA,  
REGIONAL MUNICIPALITY OF PEE



SCALE NTS  
APRIL 05, 2024



#### Concerns Related to the Draft Mississauga Official Plan 2051:

We have reviewed the draft Mississauga Official Plan 2051 ('Draft OP'), released on February 12, 2024. The draft policies propose revisions to various Chapters and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns which were outlined in the Comment Letter prepared on behalf of the Owner, dated March 15, 2024. This Letter does not seek to repeat the concerns raised in the above-noted Comment Letter. Instead, this Letter is focused on a concern with the Site's exclusion from the Central Erin Mills Major Node.

Based on our review of the Draft OP, we are concerned that the City Structure, as outlined on Schedule 1, remains unchanged from the time of the last Official Plan Review. The current and previous Official Plan Review initiatives have not undertaken a comprehensive review of the City Structure component boundaries since the City Structure was created in the early 2000s when the Mississauga Plan was adopted. To identify how growth and development is to occur up to the year 2051, now would be the appropriate time to complete an updated comprehensive assessment and review of all mall-based and transit-based Community Node boundaries as well as Major Node Boundaries given collectively, these are areas where intensification and compact, transit-supportive growth is to be directed.

While we support the continued use of a City Structure to guide growth and development based on a hierarchy of appropriate locations to accommodate growth, exclusion of the Subject Lands from the Central Erin Mills Major Node would be a missed opportunity and should be revised. Inclusion of the Subject Lands within the Central Erin Mills Major Node is appropriate and desirable for the following reasons:

- The Site is immediately adjacent to the current Central Erin Mills Major Node limit;
- The surrounding area is evolving and accommodating a diverse range of land uses, built forms and activities. Inclusion of the Site will further support this evolution and enable a continuous and harmonious integration;
- The Site represents a natural and logical extension of the Major Node;
- The Site is appropriate and desirable location to accommodate higher density, compact, mixed-use, transit supportive development given its locational characteristics of being in proximity to existing transit services, greenspaces, services and amenities – all the components necessary to support daily needs and the creation of Central Erin Mills as a vibrant, 15-minute complete community;
- The Site is located along Erin Mills Parkway - a designated Rapid Transit Corridor by the Region of Peel Official Plan where higher density, compact development ought to occur;
- The Site is visually and functionally screened and buffered from the surrounding Neighbourhood by an existing woodlot, public Right-of-Ways and by existing Stormwater Management ('SWM') Ponds. This provides an appropriate transition to surrounding residential areas. ;
- It will support achievement of Provincial and Regional growth management and complete community objectives
- It will support achievement of the City's housing goals, including the provision of more than 1,000 units towards the City's housing targets;
- It will enable the long-term preservation and health of the nearby natural feature and its functions; and,
- It will enable development to occur in a cost-efficient form.

Based on the above, it is our opinion that the Subject Lands can and should be included in the Central Erin Mills Major Node as part of the current Official Plan Review initiative to enable appropriate development and growth to occur. The current City Structure boundaries, if left intact, will challenge the City's ability to meet Provincial growth targets, intensification targets and the delivery of high-quality, mixed-use development and greater housing choice in the midst of a Provincial housing crisis. It will also require the use of a privately-initiated Official Plan Amendment application to implement the same request outlined here.

**Conclusion:**

In summary, we are concerned about the proposed policy directions and maintenance of the current City Structure outlined in the Draft OP will unnecessarily inhibit appropriate, necessary intensification to occur. We request that modifications as identified throughout this letter be made. Thank you for the opportunity to provide these comments. Our Client, the Owner, wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Jim Levac, MCIP, RPP  
Partner



Stephanie Matveeva, MCIP, RPP  
Associate

cc. Owner  
Councillor Butt  
Bashar Al-Hussaini, Policy Planner  
City Clerk and Members of Council



Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

June 28, 2024

GSAI File: 048 – 006

(Via Email)

Mr. Ben Phillips

Project Manager, Official Plan Review

Planning &amp; Building Department

City Planning Services Division

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051**  
**Star Seeker Inc., 619 Lakeshore Inc., 1022 Caven Inc. and 1028 Caven Inc.**  
**579, 619 Lakeshore Road East & 1022, 1028 Caven Street, City of Mississauga**

Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to Star Seeker Inc., 619 Lakeshore Inc., 1022 Caven Inc. and 1028 Caven Inc. (collectively, the 'Owners') of the lands municipally known as 579, 619 Lakeshore Road East and 1022, 1028 Caven Street (the 'Subject Lands' or 'Site'), in the City of Mississauga. On behalf of the Owners, we are pleased to be providing this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

#### **Background Information:**

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are an assembly of four (4) parcels, collectively located on the north side of Lakeshore Road East, west of Caven Street. The Site is currently improved with a local retail plaza comprised of a multi-tenant commercial structure with surface parking areas, a detached commercial structure with surface parking area and two (2) detached dwellings. Based on the in-effect planning policy framework, the Subject Lands are located within the Lakeview Neighbourhood Character Area, is directly in front of the planned Lakeshore Bus Rapid Transit ('BRT') network, is in proximity to the Lakeview Waterfront Major Node Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), and is designated 'Mixed Use' and 'Medium Density Residential' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact development to occur. This is strengthened by the Site's locational characteristics of being within directly in front of the planned Lakeshore BRT network and within 300 metres of various street-level

transit services. Additionally, the Site is located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Lakeview as a vibrant, complete, 15-minute community.

In addition, we note that the Subject Lands are subject to an active Official Plan Amendment and Zoning By-law Amendment Application (City File No. OZ/OPA 22-26 W1). This Application seeks to introduce a vibrant, compact, mixed use development on the Subject Lands comprised of two (2), 6-storey structures fronting onto and addressing the Lakeshore Road East frontage as well as two (2), tall structures with three (3), 16-storey tower components. The tower components rise above podiums. Overall, the proposed development has been planned and designed to implement a complimentary range of uses on the same lot, a transit-supportive development form and contextually appropriate development that provides transition to the surrounding area. The proposed development also further implements the development vision for compact, pedestrian-oriented, mixed-use development along the Lakeshore Road corridor as outlined in the Lakeview Local Area Plan and the Lakeshore Connecting Communities Master Plan.

#### **Concerns Related to the Draft Mississauga Official Plan 2051:**

We have reviewed the draft Mississauga Official Plan 2051 ('Draft OP'), released on February 12, 2024. Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 14 (Neighbourhoods) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns as outlined below.

#### ***Chapter 3: Directing New Development***

The Draft OP continues to provide guiding policy direction for how growth and development is to be managed in accordance with a City Structure. The proposed City Structure, as presented on Schedule 1, remains largely unchanged from the in-effect Mississauga Official Plan. In the case of the Subject Lands, the proposed City Structure continues to identify the sites as being located within the Neighbourhood component of the City Structure. While we support the continued use of a policy framework, structured by the City Structure, the continued inclusion of the above-noted lands within the Neighbourhoods component may further challenge the delivery of refined, optimized, redevelopment forms in appropriate locations.

#### ***Chapter 5: Housing Choices and Affordable Homes***

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types,

such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types will be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to enable greater flexibility by encouraging phased developments to provide a range and mixture of housing units, rather than referencing housing type.

*'5.2.4. To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- social housing or other publicly funded housing; or*
- specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients, employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 Draft OP in May of 2023. Notwithstanding that the policy has been revised since the previous iteration, we remain concerned. In our opinion, the above-noted policy should be revised and any reference to specific percentage of larger dwelling units should be removed. As written, the requirement for any number of units to be of a certain type will challenge Provincial, Regional and local policy objectives of delivering a variety of attainable housing options for current and future residents. It will also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis. Instead, the policy should be revised to encourage a range of housing units to be provided so that the changing needs of residents can be met.

*'5.2.5. The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>

Density	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>
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The above-noted policy and Table 5.1, as written, are concerning and should be removed. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning and contrary to the powers of the City. Furthermore, the above-noted housing-related targets have not been adapted nor studied to ensure applicability at the specific City-wide scale. Furthermore, the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the policy requirement for affordable units on a City-wide or Region-wide basis is contrary to Provincial policy which states that affordable units are only required in delineated Inclusionary Zoning Areas. Given the Subject Lands **are not** located within a delineated Inclusionary Zoning Area, the requirement to provide affordable housing units does not apply. Policy 5.2.5 and Table 5.1 must be removed or modified.

#### ***Chapter 8: Well Designed Healthy Communities***

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires further consideration and modification. In our opinion, the requirement for a built form to have a relationship to the width of the Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique attributes and its context. The policy also does not account for the diverging widths of streets across the City. Requiring that a built form relate to the street on which it fronts does not adequately account for the variation of street classifications and will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. This policy requires revision to eliminate a universal application of building height limits based on a site's location along a street as greater flexibility to permit buildings of appropriate scales and heights is required and desirable.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes and development contexts. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City

Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size, locations and configurations can be successfully planned, designed and delivered in various ways. Based on the above, we recommend that the above-noted policy be modified to encourage compliance with the applicable City Standard and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy should must be revised to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. The 45 degree angular plane requirement will challenge the delivery of high-quality, refined development in appropriate locations. We request that the angular plane requirement of Policy 8.6.2.5 be removed.

#### ***Buildings and Building Types***

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the Draft OP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. Of relevance to the Subject Lands, the Draft OP framework presents characterizations of mid-rise and high-rise built forms. These built forms are characterized as follows:

- 'b. Mid-rise buildings: in Mississauga, mid-rise buildings are generally higher than four storeys with maximum heights as prescribed by area-specific policies and land use designations. Their height should not exceed the width of the right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings can accommodate many uses and provide transit-supportive densities yet are moderate in scale, have good street proportion, allow for access to sunlight, have open views to the sky from the street, and support high-quality, accessible open spaces in the block. Mid-rise buildings provide good transition in scale to adjacent low-rise built forms.*
- c. High-rise buildings: they represent buildings with height maximums as prescribed by local area policies and land use designations. High-rise buildings, which can also be referred to as Tall Buildings in this Plan, provide transit-supportive densities and play an important role in allowing the city to meet its growth targets, especially within Strategic Growth Areas.'*

The above mid-rise and high-rise building characterizations are problematic. Specifically, the above characterizations do not adequately capture the reality of development forms and do not provide for sufficient flexibility to accommodate



high-rise or tall buildings at appropriate locations. Furthermore, the characterization of high-rise buildings does not adequately capture the existing permissions provided to the Subject Lands in the Lakeview Local Area Plan and by Mississauga Official Plan Amendment 131, which collectively permit high-rise buildings of up to 14 storeys despite the Subject Lands not being located within a Strategic Growth Area. We are also concerned with the characterization of mid-rise buildings as having a permitted height range and requiring that this built form have a relationship to the width of a street upon which it fronts. For the above-noted reasons, we oppose the mid-rise and high-rise building characterizations. These characterizations should be modified to recognize the existence of a variety of built forms and allow permission for these built forms at appropriate locations across the City.

#### *Chapter 10: Land Use Designations*

The Draft OP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning.

In accordance with the Draft OP Schedule 7, Land Use Designations, the Subject Lands are proposed to retain the 'Mixed Use' designation on the western quadrant of the Site, while the current designation of 'Medium Density Residential' for the eastern quadrant is to be modified to 'Residential Low-Rise II'.

Maintenance of the 'Mixed Use' designation and re-designation of the Subject Lands to 'Residential Low-Rise II' is concerning. Section 10.2.6 of the Draft OP contains the parent Mixed Use policy framework which any development application must be evaluated. We are concerned with Policies 10.2.6.2 and 10.2.6.3 as stated below.

*'10.2.6.2. The planned function of lands designated Mixed Use is to provide a variety of retail, service and other uses to support the surrounding residents and businesses. Development on Mixed Use sites that includes residential uses will be required to contain a mixture of permitted uses. This mix of uses is required in order to create complete communities with destinations that are close enough for walking and cycling to be the most attractive transportation option. In addition to mitigating traffic congestion, this enhances human health and reduces greenhouse gas emissions.'*

*'10.2.6.3. Redevelopment of Mixed Use sites must maintain the same amount of non-residential floor space.'*

The above-noted policies require revision. Collectively, the above-noted policies are unnecessarily restrictive and may challenge the ability for lands to be appropriately redeveloped. Specifically, that a range of retail, service and other uses be provided can be a challenge for development proponents to accommodate and may challenge a proponent's ability to offer a sufficient and efficient non-residential floor area. Similarly, the policy requirement that existing non-residential floor area be replaced does not adequately accommodate the evolving context of communities and market trends. Furthermore, the policies noted above may hinder the development potential of designated Mixed Use lands and the lands' ability to support contextually appropriate development that is able to further implement Provincial, Regional and local policy objectives for compact, mixed-use, complete communities. Lastly, the above-noted policies do not satisfactorily reflect changing market trends nor does it enable a proponent to provide an appropriate amount of non-residential. Greater flexibility is needed to enable vibrant, compact, efficient redevelopment forms to be implemented in appropriate locations.

We also note that given the Subject Lands are subject to an active development application, we expect that once approved, the corresponding land use designation assigned to the Site will be reflected in the 2051 Mississauga Official Plan.

#### Chapter 14: Neighbourhoods

Revisions are contemplated in Chapter 14 for lands located within the Neighbourhood component of the City Structure. As stated above, the Subject Lands are located within the Lakeview Neighbourhood Character Area. As such, the Site is subject to the parent Neighbourhood Character Area policies presented in Section 14.1.1, General, and the Character Area-specific policies in this case provided by the Lakeview Local Area Plan. We highlight that any modifications contemplated to the in-effect Local Area Plans are absent from the Draft OP. This absence is concerning and prevents an evaluation of the Draft OP in its totality.

When considered collectively, the refined Neighbourhood policy framework and in particular Policies 14.1.1.6 and 14.1.2.2 as stated below are problematic.

*'14.1.1.6. Intensification within Neighbourhoods may be considered where the proposed development is compatible in built form and scale to surrounding development, enhances the existing or planned development and is consistent with the policies of this Plan.'*

*'14.1.2.2. Within Neighbourhood Character Areas, development of Mixed Use sites that are over 1 ha in size will:*

- a. maintain the same amount of commercial floor space;*
- b. ensure a significant range of retail and service commercial uses that meet the needs of the local population is provided;*
- c. include a mix of low and mid-rise buildings with maximum heights not exceeding the width of the street right-of-way that they front onto, up to a maximum of 8 storeys;*
- d. have a maximum floor space index (FSI) of 1.75 to guide the form, massing and density of proposed buildings;*
- e. provide a well-connected road system, including the addition of public roads to encourage walking, cycling and support public transit;*
- f. ensure roads surrounding blocks are public and meet City of right-of-way and design standards;*
- g. provide public open space that is designed and located to create a central focus, in accordance with the policies of this Plan and the City's Park Plan;*
- h. provide for appropriate massing and transition to surrounding context;*
- i. ensure newly created blocks maximize connectivity, pedestrian walkability, vehicular access, servicing routes and internal permeability. Block perimeters will generally not exceed 520 m;*
- j. include a variety of unit sizes and tenures to accommodate a range of households;*
- k. explore opportunities for energy conservation through design and the use of renewable energy sources; and*
- l. adhere to urban form and design policies of this Plan and the City's Green Design Guidelines.'*

Firstly, we are concerned with policy requirements for non-residential replacement. As outlined above, the policy requirement to replace existing non-residential floor space in a development is overly restrictive and will challenge an ability for proponents to provide a sufficient amount of non-residential space that is capable of accommodating the evolving contexts of communities and market trends. In addition to this concern, the above-noted policies when considered collectively are overly restrictive and require revisions. We oppose the maximum building height of 8 storeys identified and request that this height limitation be removed. Furthermore, the statement that intensification within Neighbourhoods may be considered is contrary to the policy objectives identified throughout the Draft OP. While certain Neighbourhood Character Area lands are not suitable for higher density, compact, mixed-use development, the Subject Lands are an appropriate and desirable locations for this type of development to occur given it's locational and site attributes. The statement that intensification may be considered will challenge the development potential of lands, including the appropriate redevelopment of the Subject Lands. Similarly, the policy requirements that a significant, without clarity on how significant is to be understood, range of retail and service commercial uses be provided, that a range and mixture of specified building types be provided and that public open spaces be provided amongst other matters are unnecessarily restrictive. These policy provisions should be removed and instead, sufficiently flexible evaluation criteria should be provided to enable contextually appropriate, compatible intensification developments to occur in appropriate locations.

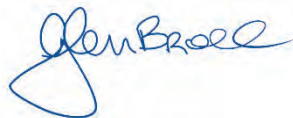
**Conclusion:**

In summary, we are concerned about the proposed policy directions outlined in the Draft OP and request that modifications as identified throughout this letter be made. Thank you for the opportunity to provide these comments. Our Client, the Owners, wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP  
**Managing Partner**



Stephanie Matveeva, MCIP, RPP  
**Associate**

cc. Owner  
Councillor Dasko  
City Clerk and Members of City Council

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:*  
**Glen Schnarr**

June 28, 2024

GSAI File: 1484 – 004

(Via Email)

Mr. Ben Phillips

Project Manager, Official Plan Review

City of Mississauga

Planning &amp; Building Department

City Planning Services Division

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051**  
**Stephen-Mitchell Realty Limited, Whitehorn Investments Limited and Lynrob Investments Limited**  
**1225 Dundas Street East, City of Mississauga**

Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to Stephen-Mitchell Realty Limited, Whitehorn Investments Limited and Lynrob Investments Limited (the 'Owners') of the lands municipally known as 1225 Dundas Street East, in the City of Mississauga. On behalf of the Owner and further to the Comment Letter, dated March 15, 2024, we are pleased to be providing this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

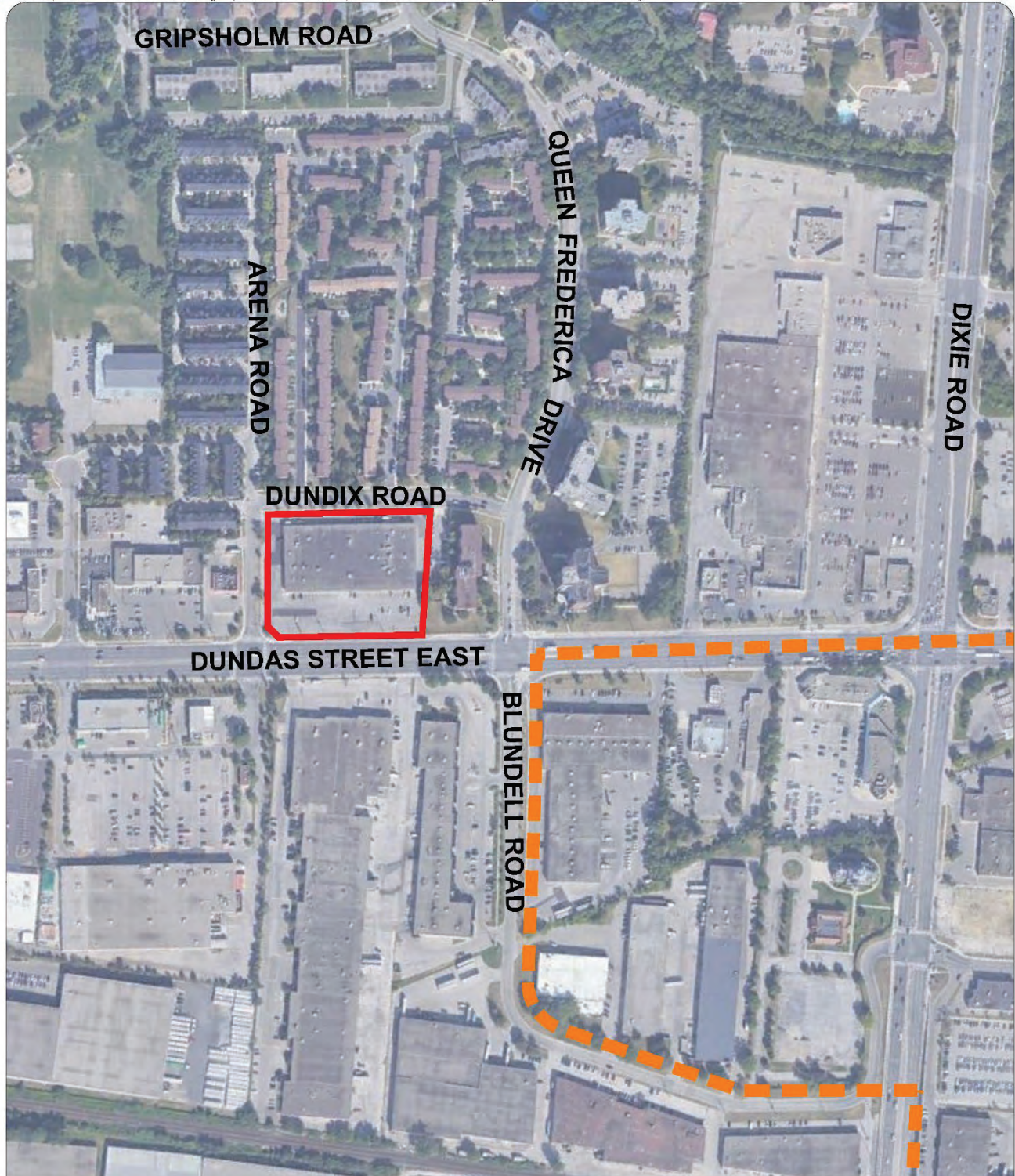
#### **Background Information:**

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the north side of Dundas Street East, west of Queen Frederica Drive. The Site is currently improved with a local retail plaza comprised of a low-rise multi-tenant commercial structure and surface parking areas. Based on the in-effect planning policy framework, the Subject Lands are located within the Applewood Neighbourhood Character Area, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the Dixie GO Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), is in proximity to the newly refined Dixie-Dundas Community Node (in accordance with Mississauga Official Plan Amendment 141 and as shown in the **Aerial Context** image on the next page), and is designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above and the surrounding context, the Site has recognized significant development potential. This is further supported by the Site's location along the Dundas Street corridor and its inclusion within the Dundas Connects Master Plan.



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## AERIAL CONTEXT PLAN

CITY OF MISSISSAUGA

### LEGEND

- Subject Lands
- Dixie-Dundas Community Node Boundary

1225 DUNDAS STREET EAST  
PART OF LOT 7, CONCESSION 1 NDS,  
CITY OF MISSISSAUGA,  
REGIONAL MUNICIPALITY OF PEEL



SCALE NTS  
APRIL 19, 2024



When considered collectively, the in-effect policy framework identifies the Site as an appropriate and desirable location for higher density, compact, mixed-use, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being immediately directly in front of the planned Dundas Bus Rapid Transit ('BRT') network, being within 300 metres of various street-level transit services and the Dixie GO Station. Additionally, the Site is located within walking distance of various services, amenities, facilities, schools, parks and greenspaces to meet the daily needs of residents and support Applewood as a vibrant, complete, 15-minute community.

In addition, we note that the Site is subject to active development applications for Official Plan Amendment, Zoning By-law Amendment and Site Plan Approval (City File Nos. OZ/OPA 22-20 W3, SP-22-131). Collectively, these active Applications seek to introduce a vibrant, compact, mixed-use development on the Subject Lands. Furthermore, the active Official Plan Amendment Application seeks to implement a revised City Structure that includes the Subject Lands within the Dixie-Dundas Community Node. Further detail of this active, ongoing request is provided in the Planning Justification Report, prepared by GSAI, prepared and provided in support of the active Applications.

We also highlight that the Subject Lands remain subject to an ongoing appeal of Mississauga Official Plan Amendment 141 ('MOPA 141'). MOPA 141, adopted by City Council in August 2022, sought to refine policy permissions for lands along the Dundas Street corridor in order to further implement the findings of the City of Mississauga Dundas Corridor Policy Implementation project, the Dundas Connects Master Plan and the City of Mississauga Major Station Area Study. Overall, MOPA 141 refined policy permissions for lands across Dundas, including the Subject Lands. An appeal of MOPA 141 was filed on September 2, 2022 and remains unresolved. We respectfully request that the concerns raised throughout this Letter and those concerns raised in the Notice of Appeal to MOPA 141 be considered.

#### **Concerns Related to the Draft Mississauga Official Plan 2051:**

We have reviewed the draft Mississauga Official Plan 2051 ('**Draft OP**'), released on February 12, 2024. The draft proposes revisions to various Chapters and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Draft OP, we have a number of concerns which were outlined in the Comment Letter prepared on behalf of the Owner, dated March 15, 2024. This Letter does not seek to repeat the concerns raised in the above-noted Comment Letter. Instead, this Letter is focused on a concern with the Site's exclusion from the Dixie-Dundas Community Node.

Based on our review of the Draft OP, we are concerned that the City Structure, as outlined on Schedule 1, remains unchanged from the time of the last Official Plan Review. We are concerned that the current and previous Official Plan Review initiatives have not undertaken a comprehensive review of the City Structure component boundaries since the City Structure was created in the early 2000s when the Mississauga Plan was adopted. Furthermore, the current Draft OP which is to identify how growth and development is to occur up to the year 2051, this is the appropriate time for a comprehensive assessment and review of all mall-based and transit-based Community Node boundaries as well as all Major Nodes given collectively, the City's Major Nodes and Community Nodes are where intensification is to be directed.

While we support the continued use of a City Structure to guide growth and development based on a hierarchy of appropriate locations to accommodate growth, exclusion of the Subject Lands from the Dixie-Dundas Community Node is concerning, represents a missed opportunity and should be revised. Inclusion of the Subject Lands within the Dixie-Dundas Community Node is appropriate and desirable for the following reasons:

- The Site is immediately in front of the planned Dundas Bus Rapid Transit ('BRT') network and is located within the delineated Dixie GO Major Transit Station Area ('MTSA');
- It is in proximity to the current Dixie-Dundas Community Node limit;
- The surrounding area is evolving and accommodating a diverse range of land uses, built forms and activities. Inclusion of the Site will further support this evolution and enable a continuous and harmonious integration;
- The Site represents a natural and logical extension of the Community Node as it would be consistent with the Dixie GO MTSA boundary;
- The Site is appropriate and desirable location to accommodate higher density, compact, mixed-use, transit supportive development given it's locational characteristics of being in proximity to existing transit services, greenspaces, services and amenities – all the components necessary to support daily needs and the creation of a vibrant, 15-minute complete community;
- The Site is located along Dundas Street East - a designated BRT Corridor by the Region of Peel Official Plan where higher density, compact, mixed-use development and intensification ought to occur;
- It will continue to provide compatible development and appropriate transition to the surrounding Neighbourhood;
- It will support achievement of Provincial and Regional growth management, complete community and Transit Station Area objectives; and,
- It will enable development to occur in a cost-efficient form.

Based on the above, it is our opinion that the Subject Lands can and should be included in the Dixie-Dundas Community Node as part of the current Official Plan Review initiative to enable appropriate development and growth to occur. The current City Structure boundaries, if left intact, will challenge the City's ability to meet Provincial growth targets, intensification targets and the delivery of high-quality, mixed-use development and greater housing choice in the midst of a Provincial housing crisis. Furthermore, the continued exclusion of the Site would necessitate approval of the current privately-initiated Official Plan Amendment application to implement the same request outlined here.

**Conclusion:**

In summary, we are concerned about the proposed policy directions and maintenance of the current City Structure outlined in the Draft OP and request that modifications as identified throughout this letter be made. Thank you for the opportunity to provide these comments. Our Client, the Owner, wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.



Yours very truly,  
GLEN SCHNARR & ASSOCIATES INC.

Jim Levac, MCIP, RPP  
Partner

Stephanie Matveeva, MCIP, RPP  
Associate

cc. Owners  
Councillor Fonseca  
Bashar Al-Hussaini, Policy Planner  
City Clerk and Members of Council

June 28, 2024

City Planning Strategies Division  
 Planning and Building Department  
 300 City Centre Drive, 7th floor  
 Mississauga, ON L5B 3C1

Attention: Amina Menkad, Project Lead, Official Plan Review  
 Ben Phillips, Project Manager, Official Plan Review

RE: City of Mississauga Official Plan Review, Draft New Official Plan  
 BGO

Dear A. Menkad and B. Phillips:

Sajecki Planning Inc. is pleased to submit this letter on behalf of BGO (formerly BentallGreenOak) in relation to the City of Mississauga's ongoing Official Plan Review (OPR). The City has requested comments on the draft Mississauga Official Plan 2051 (MOP 2051). This letter builds on previous comments we submitted on behalf of BGO on July 28, 2023.

BGO wishes to express its continued support for the City's efforts to enhance the diversity and mix of housing across Mississauga, particularly in established Neighborhoods. However, we encourage the City to explore additional opportunities for context-appropriate intensification in alignment with provincial and regional policy directions and housing goals.

The in-force Official Plan includes policies for Major Nodes, Community Nodes, and Neighborhoods that permit intensification beyond the heights contemplated for the City Structure element on appropriate sites, provided impacts on surrounding buildings or neighborhoods can be mitigated (Policies 13.1.1.3, 14.1.1.3, and 16.1.1.2). These policies recognize that not all sites share the same development potential. The draft new Official Plan lacks similar policies, which could hinder opportunities for context-sensitive intensification. Developments that previously required only a zoning by-law amendment may now need to pursue an official plan amendment as well adding cost and time to construction. The proposed policies in the consolidated draft Official Plan additionally include rigid requirements for transitions in height and density, which may prevent consideration of each site's unique context and development potential.

While we note that additional height permissions have been provided for Mixed Use sites within Neighborhoods (up to 8 storeys), the draft Official Plan does not fully leverage the strategic potential of neighborhood mall sites for future growth. These sites, typically situated on larger lots along arterial roads with superior transit access and serving as community hubs, offer significant opportunities for infill housing. Allowing mixed use intensification on these properties can benefit new residents by capitalizing on past infrastructure investments and diverting development away from less suitable areas, consistent with provincial policy direction.

The draft Provincial Policy Statement, 2024 (PPS), released on April 10<sup>th</sup>, 2024, contemplates that planning authorities should "support redevelopment of commercially-designated retail lands (e.g., underutilized shopping malls and plazas), to support mixed-use residential." Further, it requires

planning authorities to permit and facilitate “all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment which results in a net increase in residential units...” Although the new PPS is not yet in effect, it recognizes the role that existing neighbourhood mall sites can play in intensification and meeting housing targets. For this reason, the Official Plan should give additional consideration to neighbourhood mall sites as strategic growth areas.

BGO acknowledges the importance of predictability in growth management but believes there are opportunities to harness the unique potential of sites across the City on a site-specific basis, thereby substantially contributing to the City's housing stock and addressing the ongoing housing crisis. We respectfully request that staff consider reintroducing policies similar to Policies 13.1.1.3, 14.1.1.3, and 16.1.1.2 of the in-force Official Plan, allowing for consideration of site-specific circumstances when reviewing height permissions. We also recommend softening language around the need for transitions to occur within established height ranges.

Additionally, we suggest a more flexible approach to the following draft policies:

Policy Number	Comment	Recommendation
Policy 3.3.5.2 <i>Rationale for the importance of maintaining the City Structure</i>	Although certainty in growth management is important, this policy sets the framework for limiting consideration for site-specific amendments.	Relax language to reflect opportunities for site-specific conditions to inform development potential (beyond what is outlined in the Official Plan).
Policy 17.4.5 <i>Transitions in height and built form to occur within height ranges established by the Plan</i>	Limiting transitions to identified height ranges treats all lands within a land use designation or Character Area the same, implying conditions that support higher intensity development, for example, do not exist one property out from the identified Character Area boundary.	Replace “will” with “should”.
Existing policies 13.1.1.3, 14.1.1.3, 16.1.1.2 (proposed to be removed); existing Section 19.5 (proposed to be removed) <i>Consideration for heights greater than those established in the Official Plan, subject to criteria</i>	By removing policies outlining when exceptions might be considered, the City is forcing development applications to pursue official plan amendments where they might previously have only required a zoning by-law amendment application.  Although the removal of these policies does not prevent site-specific amendments from occurring, it removes guidance for staff in the review of amendment applications thereby limiting the consideration of local context in the review of development applications.	Reintroduce policies similar to Policy 16.1.1.2 of the in-force Official Plan.
Policy 14.1.2.2 <i>New policies for redevelopment of Mixed Use sites over</i>	While recognizing 8 storeys on these sites is an increase from the existing height permissions, a maximum height of 8 storeys on these sites does not reflect the true development potential of these	Consider additional height permissions (or criteria where additional height may be considered)

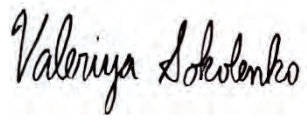


<p><i>1 ha in size within Neighbourhood Character Areas</i></p>	<p>sites and limits opportunities for context-sensitive redevelopment.</p> <p>Identifying a maximum floor space index of 1.75 ignores site-specific opportunities for greater intensification. Without policies that outline when greater densities may be permitted without an amendment to the official plan, this policy will result in unnecessary official plan amendments increasing time and cost to approval.</p> <p>Requiring redevelopment to maintain the same amount of commercial floor space in the absence of market demand hinders development of much-needed housing.</p> <p>Specific block perimeter requirements are more appropriate as urban design guidelines (not policy) as urban design objectives can be achieved through a variety of design solutions.</p>	<p>Remove the 1.75 maximum FSI or introduce policies outlining criteria by which additional density may be considered without an official plan amendment application.</p> <p>Replace 'maintain the same amount of commercial floor space' with 'maintain the neighbourhood function of the site'.</p> <p>Remove reference to a specific block perimeter requirement.</p>
<p>Policy 10.2.6.3</p> <p><i>Replacement of non-residential floor space on Mixed Use sites</i></p>	<p>100% replacement is not financially viable given current trends in commercial real estate and can result in properties remaining underdeveloped or vacant at the expense of potential new housing. Retail has experienced an incredible transformation in the last 10 years and the trend is towards less but higher-quality space.</p>	<p>Remove this policy OR permit a reduced replacement percentage where supported by a market study. Our team's research suggests a 40-50% replacement ratio is appropriate.</p>
<p>Policy 5.2.1</p> <p><i>New housing assessment report requirement for development applications of 50 new units or more</i></p>	<p>Although it is important to monitor the delivery of housing of different levels of affordability, tenures, and densities at a city-level, the preparation and review of additional submission materials contribute to lengthy approval processes increasing the cost of constructing housing.</p>	<p>Incorporate any reporting requirements into the terms of reference for Planning Justification Reports or as part of a project data sheet.</p>

On behalf of BGO, we thank you for the opportunity to provide our feedback on the draft Official Plan. We support the City's efforts toward building complete communities that leverage existing and planned infrastructure. Together, we hope to create opportunities for increased housing options, sustainable transportation modes, and placemaking.

If you have any questions, please do not hesitate to contact me at 647-497-8000 ext. 6 or [valeriya@sajeckiplanning.com](mailto:valeriya@sajeckiplanning.com).

Sincerely,

A handwritten signature in black ink that reads "Valeriya Sokolenko". The script is cursive and fluid.

Valeriya Sokolenko

M.Pl

*Senior Planner, Sajecki Planning Inc.*

Copy:

David Sajecki

MCIP RPP M.PL B.Eng LEED AP

*Partner, Sajecki Planning Inc.*

28 June 2024

City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L5B 3C1

Attention: Amina Menkad, Project Lead, Official Plan Review  
 Ben Phillips, Project Manager, Official Plan Review

RE: Proposed Mississauga Official Plan 2051  
 Edenshaw Developments Limited

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Dear A. Menkad and B. Phillips:

Sajecki Planning hereby submits this letter to the City of Mississauga (the City) on behalf of Edenshaw Developments Limited (Edenshaw) in relation to the City's draft Mississauga Official Plan 2051. This letter expands on comments provided in our letter submitted to the Planning and Development Committee dated March 18, 2024.

Comments are organized by Chapter in the draft Mississauga Official Plan.

### **Chapter 3.0: Directing New Development**

#### Rationale for the City Structure

Draft Policy 3.3.5.2 outlines a multi-faceted rationale for why site-specific development applications must respect the draft Official Plan's City Structure thereby laying the groundwork for refusing site-specific amendments that challenge permissions established in the City Structure's hierarchy of densities. Although we agree that effective growth management requires a city-wide approach to balance development pressures with the availability of hard and soft infrastructure, the Policy as currently drafted ignores the role of context-specific development in achieving city-building objectives, such as addressing the City's ongoing housing crisis. Area-wide policies by necessity do not reflect site-specific conditions, and to discourage site-specific amendments to capitalize on these unique conditions, significant opportunities for context-sensitive housing development are lost.

*Recommendation: add language to reflect opportunities for site-specific exceptions where local context (whether it is lot size, dimensions, orientation, adjacency, etc.) supports heights or densities beyond those established by the Official Plan*

## Chapter 4.0: Sustaining the Natural Environment

### Requirements for Privately Owned Public Spaces

The purpose of draft Policy 4.3.4.21 is unclear. As currently drafted, Policy 4.3.4.21 appears to outline a series of requirements for Privately Owned Public Spaces (POPS), including the need for POPS to front onto a public street at street level. Requiring street frontage unnecessarily restricts the location of POPS on constrained sites resulting in either inefficient site layout or lost opportunities to provide high-quality publicly available park space.

*Recommendation: soften language to encourage public street frontage (rather than require) or clarify the intent of the policy*

## Chapter 5.0: Housing Choices and Affordable Homes

### Range and Mix of Housing Types within Phased Development

Draft Policy 5.2.2 states that, “Phased development will have a range and mix of housing types for each development phase.” Although the intent of the policy is supportable, requiring a range and mix of housing types be provided per phase is unnecessarily prescriptive and could result in inefficient site planning or construction phasing.

*Recommendation: replace “will” with “should”*

### Unit Mix Targets

Draft Policy 5.2.4 states that, “To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:

- a. social housing or other publicly funded housing; or
- b. specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients, employees or people with specific needs.”

Although we support staff’s revision of this policy between Policy Bundle 3 and the consolidated draft from ‘requiring’ to ‘encouraging’ a proportion of larger units, the revised percentage of 50% 2- and 3-bedroom units is quite high and may not reflect market demand for these types of units. Additionally, the phrasing of the revised policy seems inconsistent with the change made. If a certain percentage of larger units is being ‘encouraged’, how can the City ‘reduce these percentages’ subject to certain criteria?

*Recommendation: reduce the percentage of 2- and 3-bedroom units or add flexibility to the policy to reflect other ways to achieve the unit mix target, including the provision of units that could be collapsed to create larger units when the demand emerges*

### Regional Housing Targets

Draft Policy 5.2.5 and Table 5.1 reference targets relating to the affordability, tenure, and built form of new housing units. Although increasing affordable, rental, and higher-density housing are commendable goals, we do not believe these targets are appropriate to be included in the

Mississauga Official Plan. These targets were taken directly from the Region of Peel Official Plan and, to our knowledge, have not been adapted or evaluated at the City-wide level. Additionally, whereas Peel Region is a housing provider, and so is in a position to construct the kind of housing it identifies in its Official Plan, the City of Mississauga is not. In this way, these targets may be better left to a Housing Strategy rather than local policy.

If the intent is to encourage these types of developments, a more effective approach may be to use these targets to identify appropriate incentives for specific types of the development, whether in the form of credits for municipal fees and levies or streamlined approval processes to offset potentially inhibitive market conditions.

*Recommendation: remove housing targets from the Official Plan*

### Housing Assessment Report

Draft Policy 5.2.1 introduces a new housing assessment report requirement for development applications of approximately 50 units or more. Although it is important to monitor the delivery of housing of different levels of affordability, tenures, and densities at a city-level, the preparation and review of additional submission materials contribute to lengthy approval processes increasing the cost of constructing housing.

Additionally, as currently drafted, the policy states that a housing assessment may be required for applications less than 50 units; however, the conditions in which such a requirement might be requested are not provided.

*Recommendation: incorporate any reporting requirements into the terms of reference for Planning Justification Reports or as part of a project data sheet*

*Recommendation: clarify the policy to outline under what conditions a housing needs assessment report will be required for developments less than 50 units*

### Affordable Housing

Introductory language to Section 5.3.3 Provide Affordable Housing states that, “Affordable housing should be included on redevelopment sites as a matter of good planning and to address the needs of diverse households.” Although we agree with the need for affordable housing, policy language needs to acknowledge the impact of market conditions on the viability of development with affordable housing units.

*Recommendation: replace ‘should be included’ with ‘is encouraged to be included’*

*Recommendation: add ‘where feasible’ after ‘on redevelopment sites’*

### Alternative Standards for Affordable Housing Development

Policy Bundle 3 included a draft Policy 5.2.3.5 that identified alternative development and design standards for affordable housing development, including reduced setbacks, narrower lot sizes, reduced parking standards, and on-street parking management to reduce development costs. We support this draft policy.

*Recommendation: reintroduce this draft policy*



## Chapter 6.0 Recognizing our Past

### Intangible Cultural Heritage

Draft Policy 6.2.9 allows the City of Mississauga to identify and conserve 'intangible cultural heritage.' There are no policies or definitions to explain what is meant by this term, nor the specific protections being afforded it.

*Recommendation: add a definition for intangible cultural heritage*

## Chapter 7.0 Getting Around our Communities

### Encroachments into the Road System

Draft Policy 7.3.4.8 is revised from an existing policy in the in-force Official Plan limiting below and at-grade encroachments. Clarification, however, is needed as to whether 'the road system' refers to the right-of-way (including the sidewalk) or the road itself. The in-force version of the policy included an exception for canopies and awnings which are important weather-protecting elements that contribute to high-quality pedestrian environments.

*Recommendation: revise policy to clarify the intent of the term 'road system'*

## Chapter 8.0 Well Designed Healthy Communities

A general observation throughout the new Chapter 8.0 Well Designed Healthy Communities, and the Official Plan more generally, is more and stronger direction on urban design issues, including requirements for specific design elements (including angular planes, stepbacks, setbacks, separation distances, etc.) and greater use of the term 'shall' or 'will'. Many of these new and revised policies have the potential to be overly prescriptive and may be better suited for inclusion in urban design guidelines rather than policy as they do not account for site-specific constraints that may make a specific design element unfeasible.

### References to Specific Design Elements

Draft Policy 8.3.12 includes new language speaking to the use of 'appropriate height transitions and separation distances' to achieve a cohesive silhouette and a well-articulated architectural expression. Draft Policy 8.6.1.3 states street proportion and open views to the sky will be achieved by 'stepping back building massing' and that daylight and privacy will be provided through 'facing distances, building heights, angular planes, and step-backs' (with similar language in draft Policy 10.2.5.9 relating to development on lands designated Residential Mid-Rise). Transition, access to natural light, and privacy, among other design objectives, can be achieved through a variety of design solutions. To tie a specific policy to a narrow list of design solutions is overly prescriptive and can limit creative context-sensitive design.

*Recommendation: if specific design elements must be mentioned, ensure policies say "can include, but are not limited to"*

### Increased Use of the Word 'Shall' or 'Will'

The New Chapter 8.0 Well Designed Healthy Communities includes policies relating to buildings and site development. Although many of these policies are not new, a significant change in language is a shift from 'should' to 'will', including most notably as it relates to compatibility (8.6.2.1, 8.6.2.2), street facing facades (8.6.1.9, 8.6.1.13), choice of building materials (8.6.1.19, 8.6.1.20), and the location of parking (8.6.1.24), among others. Although some of these directions represent good planning/design, requiring a long list of outcomes be achieved on each property ignores the reality of site-specific constraints that may make these outcomes difficult, particularly where they may be in conflict. Additionally, considerations such as building articulation and building materials are far too detailed to be regulated at the Official Plan level. These items are best addressed through area-specific or built form-specific urban design guidelines.

*Recommendation: replace "will" with "should"*

### Angular Planes

Angular planes have been found to have the unintended consequence of reducing housing affordability and supply by increasing construction costs associated with additional thermal bridging and arbitrarily reducing the number of units that could be constructed on a given site. As there are a number of effective tools to achieve transition and building articulation, we believe the City of Mississauga should consider moving away from encouraging angular planes as a means of achieving these design objectives.

*Recommendation: remove all references to angular planes*

### Design Standards for Privately Owned Public Spaces

Draft Policy 8.4.5.2 requires Privately Owned Public Spaces (POPS) to be designed in accordance with the city's standards for public open space. The city's standards for public open spaces, however, do not reflect the often encumbered nature of POPS making this requirement difficult to achieve in many instances. High-quality POPS can be designed without adherence to city standards and to restrict POPS in this way limits the ability of the city to provide a diversity of public spaces for its residents, workers, and visitors.

*Recommendation: replace "will" with "should"*

### Definition of Mid-Rise Building

The proposed definition of mid-rise building in Section 8.6.1 limits the height of buildings to the width of the right-of-way. Consistent with comments above, additional flexibility is needed in this definition of mid-rise buildings to reflect situations where heights greater than the width of the right-of-way may be appropriate, whether due to the site's size, depth, location at a major intersection, etc.

*Recommendation: add language to reflect opportunities for site-specific exceptions where local context (whether it is lot size, dimensions, orientation, adjacency, etc.) supports heights greater than the width of the right-of-way*

## Chapter 10.0 Land Use Designations

### Residential Mid-Rise Height Permissions

Draft Policy 10.2.5.8 limits the height of mid-rise buildings to the width of the street right-of-way (up to a maximum of 8 storeys). This, however, applies a one-size-fits-all approach city-wide to determining appropriate development on a site regardless of site-specific conditions thereby limiting important opportunities for transit-supportive development.

*Recommendation: add language to reflect opportunities for site-specific exceptions where local context (whether it is lot size, dimensions, orientation, adjacency, etc.) supports heights greater than the width of the right-of-way*

### Residential High-Rise Height Permissions

Draft Policy 10.2.5.10 limits the height of buildings in Residential High-Rise areas to 8 storeys or, where no Character Area or Special Site provisions exist, to the height of the tallest existing building on the property. Although we recognize that some areas are not intended for significant intensification, limiting heights to existing buildings on the same property will result in significant differential in development potential of neighbouring properties despite similar access to transit and amenities. In this way, this policy is contrary to provincial direction to allow development and density in appropriate areas.

*Recommendation: remove policy*

### Mixed Use Non-Residential Replacement Requirement

Draft Policy 10.2.6.3 requires redevelopment of Mixed Use sites to maintain the same amount of nonresidential floor space. Requiring the full replacement of non-residential floor space does not reflect market conditions and can unnecessarily restrict redevelopment. In the absence of market demand, 100% replacement is not financially viable and could result in sites remaining underdeveloped or, if developed, with vacant frontages that detract from the pedestrian experience.

*Recommendation: take a similar approach to replacement policies elsewhere in the draft Official Plan focusing on the planned function of Mixed Use sites rather than 100% replacement of existing non-residential floor space*

## Chapter 12.0 Urban Growth Centre

### Office Replacement Requirement

Although this policy is limited to Office sites, Policy 12.1.3.5 prohibits the redevelopment of existing office buildings that would result in the loss of office floor space. The nature of employment is changing, including continued prevalence of hybrid-work models and industry-wide reductions in space per work ratios as offices move from providing individual offices to open concept designs. In the context of these broader changes, many cities, including Mississauga, are suffering from a surplus of office spaces resulting in significant vacancy rates. Requiring office replacement in the absence of market demand for it may result in sites remaining underdeveloped or vacant.

*Recommendation: staff consider conducting an office needs study to inform any office/non-residential replacement policies*

#### Podium Requirement for Tall Buildings

Although existing and in-effect, Policy 12.2.8.26 requires tall buildings within the Downtown Core to be designed in the form of a podium, tower, and top form with specific requirements for podium height massing outlined in Policy 12.2.8.27. Although a best practice in many municipalities, the podium-tower-top form is only one way a building can be designed to respect the pedestrian scale, limit shadow impacts on sidewalks, and protect privacy. To require tall buildings to abide by this form, however, results in monotonous streetscapes with limited architectural variation.

*Recommendation: remove policy; instead, outline design objectives (similar to those outlined in 12.2.8.28-12.2.8.29) buildings are to consider in their design*

#### At-Grade Retail Requirement

Although currently under appeal, draft Policies 12.4.4.1 and 12.4.4.2 require Residential High-Rise and Mixed Use development along Hurontario Street to provide non-residential uses at-grade. Requiring non-residential uses can have the impact of unnecessarily restricting development where the market does not exist for the proposed use.

*Recommendation: replace “will” with “should”*

## **Chapter 13.0 Nodes**

#### Height Permissions

Draft Policy 13.3.2.1 identifies a maximum building height of four stories within Community Nodes. Draft Neighbourhood policies permit up to 8 storeys on Mixed Use sites larger than 1 ha in size. Four storeys for Community Nodes seems low and does not reflect important opportunities for intensification.

*Recommendation: staff reconsider maximum height permissions in Community Nodes in excess of 8 storeys*

#### Site-Specific Permissions Beyond Established Height Maximums

The in-force Official Plan includes Policies 13.1.1.3 and 14.1.1.3 which state that proposals for heights greater than established in Major Node and Community Node policies may be considered where certain criteria are met. This policy is proposed to be removed as part of the new Official Plan. Although it is understood that private amendment applications can be submitted regardless of the absence of this policy, Policies 13.1.1.3 and 14.1.1.3 provide the framework for reviewing site-specific applications where heights beyond those identified in the Official Plan may be appropriate. Without this policy, Official Plan policies are more rigid forcing development proposals that may be contextually appropriate and sensitively designed to go through an official plan amendment application where previously they may have only required a zoning by-law amendment, thereby increasing the cost of construction and the resulting housing.

*Recommendation: reintroduce a policy similar to 13.1.1.3 and 14.1.1.3*

### Podium Requirement for Tall Buildings

Similar to policies in the Downtown Core, Policy 13.1.2.4 requires tall buildings (in appropriate locations) to incorporate podiums to mitigate wind impacts and maximum sunlight on the public realm. As there are multiple ways these design objectives can be achieved, limiting development to a specific built form is overly prescriptive and can contribute to monotonous streetscapes.

*Recommendation: replace “will be required to” with “may”*

### Underground Parking

Draft Policy 13.1.2.6 requires existing surface parking areas to be replaced with underground or integrated above-grade structured parking as part of redevelopment. Although Major Nodes are intended to be redeveloped in a generally mixed-use and compact built form, some surface parking may still be appropriate, particularly where a site include retail uses at-grade.

*Recommendation: replace “will” with “should”*

## **Chapter 14.0 Neighbourhoods**

### Site-Specific Permissions Beyond Established Height Maximums

The in-force Official Plan includes Policy 16.1.1.2 which states that proposals for heights greater than 4 storeys or different than established in Character Area policies may be considered where certain criteria are met. This policy is proposed to be removed as part of the new Official Plan. Although it is understood that private amendment applications can be submitted regardless of the absence of this policy, Policy 16.1.1.2 provides the framework for reviewing site-specific applications where heights beyond those identified in the Official Plan may be appropriate. Without this policy, Official Plan policies are more rigid forcing development proposals that may be contextually appropriate and sensitively designed to go through an official plan amendment application where previously they may have only required a zoning by-law amendment, thereby increasing the cost of construction and the resulting housing.

*Recommendation: reintroduce a policy similar to 16.1.1.2*

### New Requirements for Development of Mixed Use Sites over 1ha in Size

Draft Policy 14.1.2.2 seeks to create a framework for the redevelopment of larger Mixed Use sites within the Neighbourhood Character Areas. However, the proposed policies may unnecessarily restrict development potential on these sites. Recognizing that 8 storeys is an increase from the existing height permissions, some properties may have site-specific characteristics that would support heights greater than 8 storeys. Restricting height to a maximum of 8 storeys without policies to address context-specific exceptions underestimates the potential for neighbourhood malls and similar mixed use sites in contributing to much-needed housing development.

Draft Policy 14.1.2.2 includes reference to maximum block perimeters. Although we agree with the objective of this policy (to ensure “newly created blocks maximize connectivity, pedestrian walkability, vehicular access, servicing routes and internal permeability”), identifying a specific metric within the Official Plan is overly prescriptive as it does not recognize the ability of creative design solutions to achieve these same objectives.



Finally, similar to comments made above, requiring redevelopment to maintain the same amount of commercial floor space in the absence of market demand may have the unintended effect of sterilizing these properties of any development potential. This is particularly problematic in the context of an ongoing housing crisis.

*Recommendation: staff reconsider maximum height permissions on Mixed Use sites within Neighbourhood Character Areas in excess of 8 storeys*

*Recommendation: remove reference to specific block sizes*

*Recommendation: take a similar approach to replacement policies elsewhere in the draft Official Plan focusing on the planned function of Mixed Use sites rather than 100% replacement of existing commercial floor space*

### Height Permissions

Draft Policy 14.1.3.3 limits buildings heights within Residential Mid-Rise and High-Rise designated lands (outside of Protected Major Transit Station Areas) to existing buildings on the same property. Consistent with comments made above, although we recognize that some areas are not intended for significant intensification, limiting heights to existing buildings on the same property will result in significant differential in development potential of neighbouring properties despite similar access to transit and amenities. In this way, this policy is contrary to provincial direction to allow development and density in appropriate areas.

*Recommendation: remove policy*

## **Chapter 17.0 Implementation**

### Review of Development Applications

Draft Policy 17.4.3 has been updated to include additional considerations in the review of development applications including “consistency with all applicable Urban Design guidelines, including the City’s Green Development Standards” and “demonstration of no adverse impacts on the development of functioning of neighbouring lands”. We believe that development applications must “have regard for”, rather than “be consistent with”, urban design guidelines. Additionally, the new language around “no adverse impacts” is overly restrictive as it is very difficult to prevent any impacts on neighbouring properties.

*Recommendation: replace “consistency with” with “consideration for” as it relates to applicable urban design guidelines*

*Recommendation: replace “no adverse impacts” with “minimal impacts” or add a definition for “adverse impacts”*

### Height Transitions

Draft Policy 17.4.5 requires all transition in height and built form to occur within height ranges established within the Official Plan. Although the intent of this policy is to protect the policy framework established for discrete geographic areas, this approach eliminates consideration for proximity and edge conditions in determining development potential by treating all lands within a land use designation/Character Area (or without) the same. This approach implies that conditions

that support higher intensity development no longer exist one property out from an identified Character Area Boundary.

*Recommendation: remove policy or replace “will” with “should” (eliminating the sentence starting with “it is the intent of this Plan...”)*

#### Submission Requirements

Draft Policy 17.4.8 outlines the full list of materials that may be required as part of a complete development application submission. Although it is recognized that the draft Official Plan only adds several new studies to this list (including a salt management plan and housing report and rental housing demolition and conversion application form) and that not all supporting materials would be required for every development application, the full list encompasses a total of 43 different types of technical studies, drawings, or other documentation to support development applications. Although Bill 185 has eliminated the refund mechanism that forced municipalities to make a decision on an application or risk losing paid application fees, review timelines (directly impacted by the volume of material submitted) impact time and cost of construction.

*Recommendation: staff consider reviewing its list of submission materials to determine appropriate level of review for different types and scales of development*

#### Development Master Plan

Draft Policy 17.4.14 was revised to remove language that provided staff (and applicants) clarity on when a development master plan may be required: “A development master plan may be required when a development proposal may set a precedent for the use, scale and form of future development of a site or area (e.g., Community Node, Major Transit Station Area).” Removing this sentence reduces clarity and provides staff with greater discretion to request additional submission materials that increase the cost and time required to approval.

*Recommendation: reinstate the existing policy as written*

#### Criteria for Site Specific Official Plan Amendments

Section 19.5 of the in-force Official Plan included criteria for site-specific official plan amendments. This section is proposed to be removed. By removing this section, and similar policies elsewhere, the new Official Plan takes a more rigid stance on height and density permissions throughout the city. Although clarity and certainty is important for growth management, overly restrictive policies eliminate opportunities for context-sensitive development, which is important when trying to address an ongoing housing crisis. Although it is recognized that the removal of this section does not prevent site-specific official plan amendment applications from being submitted, it does eliminate the policy framework for their review resulting in potentially a more narrow interpretation of official plan policies thereby impacting their review.

*Recommendation: reinstate the existing policies as written*

## Port Credit Local Area Plan

Port Credit is changing fast. With the identification of the core as a Major Transit Station Area, more needs to be done to reflect the existing (in the form of recently approved) and planned (in the form of Growth-Plan and Regional Official Plan minimum densities) in the Vision and Guiding Principles for the Port Credit Local Area Plan. Although it is understood that a fulsome review of the Port Credit Local Area Plan was not within the scope of the current Official Plan review, we encourage staff to revisit its policies in light of recent approved and under construction developments in the area.

### Port Credit as an Urban Village

Language throughout the Port Credit Area Plan makes reference to Port Credit as an “urban village” with a “village mainstreet” character (Guiding Principle 4.1, 4.5. introductory language to Section 5.2, Policy 5.2.7, Policy 9.2, introductory language to Section 12.2). Without a narrow definition for these terms, policies can be used to arbitrarily limit context-appropriate development in the area in the name of “protecting and enhancing” the “urban village character” of the area. Major Transit Station Areas are intended to be areas of higher density. Although there needs to be consideration for local context, limiting development within specific precincts within the Major Transit Station Area represents a lost opportunity to capitalize on existing transit investment and develop in a more compact and efficient form/pattern.

*Recommendation: introduce a (narrow) definition of “urban village” and “village mainstreet”*

### Resident to Job Ratio

Policy 5.2.2 identifies a residents to jobs ratio of 2:1. Although not written as a non-residential requirement, this policy suggests that in the absence of sufficient “jobs” (across the Community Node), significant residential development will be discouraged. This is combined with Policy 5.2.3, which states that “Development will contribute towards the creation of employment opportunities on lands designated mixed use”. Although the goal of complete communities is important, limiting residential development in the name of protecting for future employment is ill-advised, given changing market conditions for employment uses, and unnecessarily limits housing development in appropriate areas. Residents to jobs ratios are particularly difficult to quantify in the post-pandemic context with the rise of individuals working from home.

*Recommendation: replace “will” with “should”*

### Protected Major Transit Station Area Density Target

Introductory language to Section 5.2 states that “the Community Node has the potential to reach the targeted density of 200 residents and jobs combined per hectare for the Port Credit Protected Major Transit Station Area”. Policy 5.2.1 states that the City will monitor the gross density in the area and will assess its ability to meet this target density. Although identifying 200 residents and jobs per hectare as a target is not contradictory to provincial and regional direction (if achieved), it is misleading in that the Regional Official Plan notes 200 residents and jobs per hectare is a minimum density. Framing this density as a target indirectly limits or discourages further development where it is, in fact, encouraged at the Regional Official Plan level.

*Recommendation: revise language to reflect a minimum density of 200 residents and jobs per hectare*

#### Built Form Policies

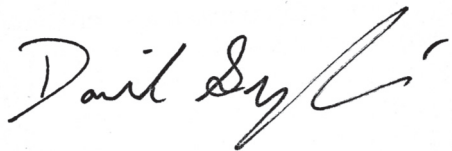
Policies 12.2.1.2 and 12.2.1.3 identify smaller floor plate sizes and minimum separation distances to achieve a number of built form objectives including protecting skyviews, limiting shadow impacts, and preserving the privacy of occupants. As these objectives can be achieved through a variety of design solutions, it is overly prescriptive for the Official Plan to identify these specific measures even in the absence of associated numerical values. These policies, in addition to Policies 12.2.1.4 and 12.2.1.5 (which speak to landscaped areas and streetscapes, respectively), reinforce an “existing” built form that is inconsistent with current practices for the planning and design of walkable mixed-use communities at transit-supportive densities.

*Recommendation: remove references to floor plate size and building separate distances*

On behalf of Edenshaw, we thank you for the opportunity to provide our thoughts on the draft Official Plan.

If you have any questions, please do not hesitate to contact me at 647-497-8000 ext. 1 or [david@sajeckiplanning.com](mailto:david@sajeckiplanning.com).

Sincerely,



David Sajecki  
MCIP, RPP, B.Eng, LEED AP  
Partner, Sajecki Planning Inc.

June 28, 2024

City of Mississauga  
 300 City Centre Drive  
 Mississauga ON L5B 3C11

Attention: Amina Menkad, Project Lead, Official Plan Review  
 Ben Phillips, Project Manager, Official Plan Review

RE: Comments on the Draft Mississauga Official Plan 2051  
 Stafford Homes Ltd.

Dear A. Menkad and B. Phillips:

Sajecki Planning hereby submits this letter to the City of Mississauga (the City) on behalf of Stafford Homes Ltd. ("Stafford") in relation to the City's ongoing Official Plan Review (OPR). Stafford has over 50 years of community building experience spanning land development, construction, and property management.

Sajecki Planning has been monitoring the City's efforts and updates in undertaking the OPR. On February 27, 2024, we attended the virtual public meeting and have also reviewed the staff report (CD.02-MIS) that was received for information by the Planning and Development Committee (PDC) at its meeting on March 18, 2024. The City has requested comments on the draft Mississauga Official Plan 2051 (MOP 2051) which are provided below.

Stafford expresses its ongoing support for the City's endeavour to increase the diversity and mix of housing across the City, particularly in established Neighbourhoods. The replacement of built form and density-premised policies in Chapter 10 (Residential Low Density I and II, Medium Density, and High Density) with height-based policies is an important step towards intensifying within developed areas that leverages in-place investments in transit, infrastructure, and services, and reduce automotive dependency. Additional housing forms and intensities throughout established Neighbourhoods will help the City meet its current and projected housing demands as socio-economic and demographic trends continue to evolve.

With this, Stafford respectfully requests that staff consider additional opportunities for context-sensitive intensification in support of provincial and regional policy direction and goals around housing. In particular, Stafford has concerns with the redevelopment restrictions of Mixed Use sites within Neighbourhood Character Areas which limits development of sites over 1 ha in size to 8-stories in height. Although the new approach to height-based policies in Chapter 10 is a positive step, focusing intensification in Strategic Growth Areas (including several larger mall sites as examined by the *Reimagining the Mall Study* approved by City Council in 2020) overlooks opportunities on smaller mall sites within Neighbourhoods that are established as trusted hubs for daily services that are centrally located and well-served by transit. In addition, policies 10.2.6.3 and 10.2.6.4 further restrict Mixed Use redevelopment to maintain the same amount of non-residential



floor space while prohibiting dwelling units on the ground floor. Grade-related residential uses can be designed to provide adequate public/private transition to adjacent areas and allow for flexibility over time (such as conversion to non-residential uses in the future).

The in-force Official Plan includes policies that allow for intensification in designations including Major Nodes, Community Nodes, and Neighbourhoods (beyond what is contemplated for respective City Structure elements) on appropriate sites where impacts on surrounding buildings or Neighbourhoods can be mitigated (policies 13.1.1.3, 14.1.1.3, and 16.1.1.2). These policies are important as they create space for the consideration of nuance and opportunities for sites with unique development potential. The removal of these policies would create certainty and predictability for the public while lightening the workload of development reviewers at the City, at the expense of alienating opportunities for context-sensitive and appropriate intensification. Similar policies should be reintroduced into the draft Official Plan. Proposed policies in the consolidated draft MOP 2051 additionally include rigid requirements for transitions in height and density to occur within height ranges established by the OP, which similarly do not represent consideration for each site's unique context and development potential.

Policy 14.1.2.2 outlines policies for redevelopment of Mixed Use sites within Neighborhood Character Areas. We are concerned several of the policies contained in 14.1.2.2 are overly prescriptive and overlook the individual characteristics and opportunities of sites around the city.

- **Changing Nature of Retail:** Neighbourhood malls are facing redevelopment as the nature of retailing has changed, leaving an absence of market demand for brick-and-mortar storefronts. The need to revitalize these sites is compounded by the urgency of the housing crisis. The arbitrary requirement to maintain the same amount of commercial floor space in the new Policy 14.1.2.2(a) limits the development potential of neighbourhood malls and other Mixed Use areas. We recommend the revision of this policy to replace a percentage of commercial space to be determined by an approved market study.
- **Context-Specific Density Considerations:** We support and encourage the Draft OP's general increase in height permissions in Mixed Use areas. However, we argue for a provision in Policy 14.1.2.2(b) that would allow for (1) a further increase to height permissions in general, and (2) consideration of site and context-specific exceptions to support greater heights. A cap of eight storeys underestimates the potential for mixed use sites in their contribution to housing development. Additionally, the density cap of 1.75 FSI is overly prescriptive in the context of an Official Plan (policy document) which further stifles development by forcing development applications to pursue an Official Plan amendment where it would otherwise not need one.
- **Decreasing Auto-Dependence:** The mandatory addition of public roads in Policy 14.1.2.2(e) will not encourage walking, cycling, and support public transit; we believe other urban design measures may be more successful in this goal. Creating more roads will in many cases encourage through-traffic into neighbourhoods while doing nothing to decrease automotive dependence. In many cases, Mixed Use areas in Neighbourhoods are already well served by transit and serve the daily needs of nearby communities.
- **Overly Prescriptive:** We find the limiting of block perimeters in Policy 14.1.2.2(i) to a certain metric overly prescriptive and inappropriate within the context of an Official Plan (policy document) as it can unnecessarily force development through additional review processes. We recommend this provision be removed.

In principle, Stafford supports proposed increased height and density permissions that will create more housing opportunities and advance provincial housing goals. It is our opinion that the currently available opportunities to harness the unique development potential of individual sites across the city should be maintained. We request the City Council consider additional policy within the draft MOP 2051 similar to policies 13.1.1.3, 14.1.1.3, and 16.1.1.2, which provide the opportunity to consider case-by-case conditions when evaluating proposals for heights and transitions.

On behalf of Stafford, we thank you for the opportunity to provide our thoughts on the Draft MOP 2051. We formally request the opportunity to continue participation in the City's OPR process, and to be notified of any future reports, consultation (or commenting opportunities), findings and/or decisions in relation to this matter. Stafford looks forward to contributing through its properties and advocacy to help achieve the City's housing and city-building goals.

If you have any questions, please do not hesitate to contact me at 647-497-8000 ext. 5 or [michi@sajeckiplanning.com](mailto:michi@sajeckiplanning.com).

Sincerely,



Michi McCloskey,  
MCIP RPP  
*Associate, Sajecki Planning Inc.*

Copy:  
David Sajecki  
MCIP RPP M.PL B.Eng LEED AP  
*Partner, Sajecki Planning Inc.*

June 28, 2024

City Planning Strategies Division  
 Planning and Building Department  
 300 City Centre Drive, 7th floor  
 Mississauga, ON L5B 3C1

Attention: Amina Menkad, Project Lead, Official Plan Review  
 Ben Phillips, Project Manager, Official Plan Review

RE: City of Mississauga Official Plan Review, Draft New Official Plan  
 Starlight Developments

Dear A. Menkad and B. Phillips:

Sajecki Planning Inc. is pleased to submit this letter on behalf of Starlight Developments concerning the City of Mississauga's ongoing Official Plan Review (OPR). We appreciate the opportunity to provide comments on the draft Mississauga Official Plan 2051 (MOP 2051). Starlight Developments wishes to express its support for the City's efforts to enhance the diversity and mix of housing across Mississauga. However, we encourage the City to explore opportunities for additional flexibility in policy to support context-appropriate intensification in alignment with provincial and regional policy directions and housing goals.

Some of the new policies included in the MOP 2051 are quite prescriptive and may be more appropriate for other documents such as urban design guidelines. The results of these policies may lead to an increased need for Official Plan Amendment applications to enable development inadvertently limiting new housing starts. This will make it more difficult for the City to achieve provincial and municipal housing objectives. At a time when Mississauga, like many other cities, faces an acute housing crisis, the City should reconsider introducing policies that overly restrict opportunities to develop new housing.

The in-force Official Plan includes policies for Major Nodes, Community Nodes, and Neighborhoods that permit intensification beyond the heights contemplated for the City Structure elements on appropriate sites, provided impacts on surrounding buildings or neighborhoods can be mitigated (Policies 13.1.1.3, 14.1.1.3, and 16.1.1.2, Section 19.5). These policies recognize that not all sites share the same development potential. The draft new Official Plan lacks similar policies, which could reduce consideration for site-specific amendments and thus reduce opportunities for contextually sensitive development. Developments that previously required only a zoning by-law amendment may now need to pursue an official plan amendment, adding additional time and cost to the development of much-needed housing. This may impact the City's ability to address its ongoing housing crisis. Additionally, the proposed policies in the consolidated draft Official Plan include rigid requirements for transitions in height and density, which may prevent consideration of each site's unique context and development potential.

Starlight Developments is actively reviewing their portfolio of rental housing properties in Mississauga, including the following sites:

- 2185 Sheridan Park Drive;
- 1970-1980 Fowler Drive;
- 5 Woodlawn Avenue, 8 Oakwood Avenue, and 206-212 Lakeshore Road East;
- 2200 Roche Court; and
- 2233-2235 Hurontario Street.

The site at 5 Woodlawn Avenue, 8 Oakwood Avenue, and 206-212 Lakeshore Road East is designated Mixed Use under the existing in-force Mississauga Official Plan, and it retains the same designation in MOP 2051. This site is approximately 800 m (a 10 minute walk) from Port Credit GO Station, located just outside of the Port Credit Protected Major Transit Station Area (PMTSA). Sites, such as this, that have convenient, walkable access to higher order transit, but are just outside of the delineated boundary of a PMTSA, are strong locations for intensification and should be considered for transitional levels of height and density greater than what would otherwise be permitted.

As a strong partner with the City in the delivery of attainable rental housing, Starlight Developments suggests a more flexible approach to the following draft policies:

***Policy 5.2.1*** *For development applications of 50 units or more, a housing assessment is required. A housing assessment may be required for applications less than 50 units, in particular circumstances as determined by the City. The housing assessment will be consistent with the City's housing objectives and policies and will demonstrate contributions towards regional housing unit targets shown in Table 5.1.*

Comments: Although it is important to monitor the delivery of housing at different levels of affordability, tenure, and density across the city; the preparation and review of additional submission materials contribute to lengthy approval processes increasing the cost of housing.

Recommendation: Incorporate any reporting requirements into the terms of reference for Planning Justification Reports or as part of a project data sheet. There is currently insufficient information on what the housing assessment will require, and this requirement should be removed until further defined.

***Policy 5.2.4*** *To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- a. social housing or other publicly funded housing; or*
- b. specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients, employees or people with specific needs.*

Comments: While we support staff's revision of this policy between Policy Bundle 3 and the consolidated draft from 'requiring' to 'encouraging' a proportion of larger units, the revised percentage of 50% for 2- and 3-bedroom units is quite high and may not reflect market demand for these types of units. Additionally, the phrasing of the revised policy seems inconsistent with the change made. If a certain percentage of larger units is being 'encouraged', how can the City 'reduce these percentages' subject to certain criteria?

Recommendation: Reduce the percentage of 2- and 3-bedroom units or add flexibility to the policy to reflect other ways to achieve the unit mix target, including the provision of units that could be collapsed to create larger units when the demand emerges. A target of 15% for units with 2 bedrooms or more better reflects both market demand and the challenges of incorporating larger units within the limited floor plate sizes encouraged by other policies.

Many of the following policies from Chapter 8: Well Designed Healthy Communities are not appropriate for inclusion in an Official Plan and would be better suited for inclusion as urban design guidelines. Design objectives can be achieved through a variety of means. Requiring developments to provide specific design elements regardless of site-specific constraints can remove opportunities for creative design. The result of many of these provisions will be to increase the number of Official Plan Amendment applications and restrict development potential. Some of these provisions may not be achievable as they provide too many constraints to development, limiting the City's ability to meet its housing goals.

**Policy 8.3.12** *While new development need not mirror existing development, new development will:*

- a. *respect existing lotting patterns;*
- b. *respect the continuity of front, rear and side yard setbacks;*
- c. *be designed to respect the existing scale, context, massing and grades of the surrounding area;*
- d. *minimize overshadowing and overlook on adjacent neighbours;*
- e. ***contribute to a cohesive silhouette and a well-articulated architectural expression through the use of appropriate height transitions and separation distances;***
- f. *incorporate stormwater best management practices and sustainable development approaches;*
- g. *identify opportunities to integrate green infrastructure and to enhance and protect adjacent natural areas; and*
- h. *preserve mature high quality trees and ensure replacement of the tree canopy.*

**Policy 8.6.2.2** *Developments will be compatible and provide appropriate transition to existing and planning development by having regard for the following elements:*

- a. *Natural Heritage System, Water Resource System, natural hazards (flooding and erosion) and natural and cultural heritage features;*
- b. *street and block patterns;*
- c. *the size and configuration of properties along a street, including lot frontages and areas;*
- d. *continuity and enhancement of streetscapes;*
- e. *the size and distribution of building mass and height;*
- f. ***appropriate height transition to adjacent buildings including considerations for applicable angular planes and separation distances;***
- g. *front, side and rear yards;*
- h. *the orientation of buildings, structures and landscapes on a property;*
- i. *views, sunlight and wind conditions;*
- j. ***the local vernacular and architectural character as represented by the rhythm, textures and building materials;***
- k. *privacy and overlook; and*



*l. the function and use of buildings, structure and landscapes.*

*8.6.2.5 Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.*

*8.6.2.7 Proposed high-rise buildings in areas where two or more high-rise buildings exist within the immediate context will relate to the surrounding buildings and provide for appropriate height transition and separation distances.*

Comments: Transition (and appropriate relationships between buildings more generally) can be achieved through a variety of methods. Additionally, angular plane requirements reduce affordability by arbitrarily requiring more thermal bridging, increasing the cost of construction and reducing the number of units that can be constructed. It often results in 'wedding-cake' developments which may not be a desirable form to encourage. Other jurisdictions are actively considering the removal of angular plane requirements altogether. Requiring the use of any specific method for providing transition is overly prescriptive and does not allow for site-specific design solutions. These elements are more appropriate as design guidelines.

Recommendation: All references to specific transition tools (including separation distances and angular planes) should be removed from policy or else presented as several of many tools.

***Policy 8.4.5.2 Privately owned publically accessible spaces will be designed in accordance with the city's standards for public open spaces.***

Comments: The City's standards for public open spaces do not reflect the often encumbered nature of POPS meaning this will be difficult to achieve. High-quality POPS can be designed without adherence to city standards. Greater flexibility may allow the market to provide innovative models of open spaces which can contribute to a high-quality open space network with a variety of recreational opportunities.

Recommendation: Remove this policy.

***Policy 8.6.1.(b) Mid-rise buildings: in Mississauga, mid-rise buildings are generally higher than four storeys with maximum heights as prescribed by area-specific policies and land use designations. Their height should not exceed the width of the right of way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings can accommodate many uses and provide transit-supportive densities yet are moderate in scale, have good street proportion, allow for access to sunlight, have open views to the sky from the street, and support high-quality, accessible open spaces in the block. Mid-rise buildings provide good transition in scale to adjacent low-rise built forms.***

Comments: Although the definition of 'mid-rise buildings' states that height "should not" exceed the width of the right of way, additional language should be incorporated to clarify that building height should take into account considerations such as lot depth and other local or site-specific conditions.

Recommendation: Add language clarifying that mid-rise building heights greater than the width of the right-of-way may be appropriate in certain conditions (for example, sites of a certain size, depth, or location on an intersection).

**Policy 8.6.1.3** *Mid-rise buildings will be designed to:*

- a. *maintain street proportion and open views of the sky from the public realm by stepping back building massing in accordance with this Plan's policies and applicable City guidelines; and*
- b. *allow for daylight and privacy for units by providing appropriate facing distances, building heights, angular planes and step-backs.*

**8.6.1.4** *Mid-rise buildings on deep sites will be designed to provide and frame accessible and **well-proportioned** open spaces that have access to sunlight and daylight.*

**8.6.1.9** *Building façades will be articulated to include changes in materials, or material treatments, as well as the indication of transition between floors and interior spaces to provide visual interest and relief.*

**8.6.1.13** *Street facing façades will have the highest design quality. Materials used for the front façade should be carried around the building where any façades are exposed to the public view at the side or rear.*

**8.6.1.17** *Tall buildings will be sited and designed to enhance an area's skyline as well as to preserve, reinforce and define view corridors.*

**8.6.1.18** *Tall buildings will address pedestrian scale through building articulation, massing and materials. The lower portion of tall building developments will include a built form that achieves street frontage and at grade relationships that prioritize a pedestrian oriented environment.*

**8.6.1.19** *Building materials will be chosen for their functional and aesthetic quality, sustainability, durability and ease of maintenance.*

**8.6.1.20** *The choice of building materials will minimize the risk for bird collisions.*

**8.6.1.22** *Buildings will be designed to conserve energy, incorporate sustainable material and where appropriate, consider alternative and renewable sources of energy.*

**8.6.1.23** *Buildings will be designed to minimize the consumption of water and to utilize stormwater best management practices.*

**8.6.1.24** *Buildings will coordinate and integrate vehicular and servicing access where feasible to minimize their visual prominence.*

**8.6.4.1** *Parking will be located underground, internal to the building or to the rear of buildings.*

Comments: The draft Official Plan includes a greater use of the word "shall" or "will" where previously policies used 'should' (including policies 8.6.2.2, 8.6.2.5, 8.6.2.7 discussed above).

Many of these revised policies are too prescriptive and do not acknowledge site-specific variability (site-specific constraints or design solutions). These policies are more appropriate as design guidelines rather than policy.

Recommendation: Revert language back to “should”.

**Policy 12.3.2.1** *New buildings will achieve a high quality urban design and built form, and will be designed and located to:*

- a. *create a transition in height generally consistent with a 45 degree angular plane that is measured from the property line adjacent to Residential Low-Rise I and II land use designations;*
- b. *generally maintain a minimum separation distance of 30 metres between portions of buildings that are greater than six storeys;*

Comments: The required 45 degree angular plane from the property line adjacent to Residential Low-Rise I and II land use designations is overly prescriptive. Angular planes also have unintended consequences with regards to a building’s environmental performance. The objective of adequate transitions between areas of different development intensities and scales is already required under other MOP 2051 policies.

The required 30 metre separation distance between portions of buildings that are greater than six storeys is overly onerous and may prevent the type of infill development envisioned in provincial and regional policy directions and housing goals. Urban form and building transition objectives can be achieved through a variety of methods and do not depend on separation distances. Buildings can be planned to be closer together and use architectural treatment and landscaping to achieve high quality urban design.

Recommendation: Remove the 45 degree angular plane requirement. Remove the 30 metre separation distance or reduce the required distance.

**Policy 14.1.3.3** *New development located within Residential Mid-Rise and High-Rise designated areas and on lands not within a Protected Major Transit Station Area will not exceed the height of any existing buildings on the property, and will be further limited in height so as to form a gradual transition in massing when located adjacent to lands designated Residential Low-Rise.*

Comments: While we recognize that some areas are not intended for significant intensification, limiting heights to existing buildings on the same property will result in significant differential in development potential of neighbouring properties despite similar access to transit and amenities. In this way, this policy is contrary to provincial direction to allow development and density in appropriate areas.

Recommendation: Remove this policy.

**Policy 16.120.2** *Notwithstanding the policies of this Plan, the following additional policies will apply:*

- a. *lands identified as Area A and Area B that are designated Mixed Use or Residential High Rise will provide a minimum of three floors of nonresidential uses in buildings immediately adjacent to Hurontario Street and Queensway West;*

Comments: Requiring a minimum of three floors of nonresidential uses in buildings immediately adjacent to Hurontario Street and Queensway West does not reflect market conditions for nonresidential development and will unnecessarily restrict redevelopment. This restriction will hinder the City's ability to meet its housing goals.

Permitting residential uses without the requirement for three floors of non-residential uses will facilitate greater residential density, which in turn supports local transit use. The surrounding area already has non-residential space that can meet the demand in a transit-supportive manner.

Recommendation: Remove this policy.

***Policy 17.4.5*** *Transition in height and built form will occur within the height ranges where established by this Plan. It is the intent of this Plan that the minimum and/or maximum number of storeys for buildings will be maintained where identified and adhered to as part of site-specific development applications.*

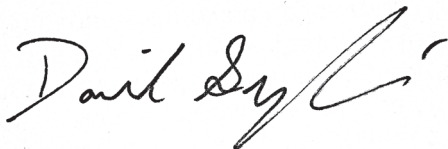
Comments: Limiting transitions to identified height ranges treats all lands within a land use designation or Character Area the same, implying conditions that support higher intensity development, for example, do not exist one property out from the identified Character Area boundary.

Recommendation: Remove this policy.

On behalf of Starlight Developments, we thank you for the opportunity to provide our feedback on the draft Official Plan. We support the City's efforts toward building complete communities that leverage existing and planned infrastructure. Together, we hope to create opportunities for increased housing options, sustainable transportation modes, and placemaking.

We would value the opportunity to meet with City staff for a conversation to discuss our comments in greater detail. If you have any questions, please do not hesitate to contact me at 647-497-8000 ext. 1 or [david@sajeckiplanning.com](mailto:david@sajeckiplanning.com).

Sincerely,



David Sajecki  
MCIP RPP M.PL B.Eng LEED AP  
Partner, Sajecki Planning Inc.



Principals

Michael Gagnon  
Lena Gagnon  
Andrew Walker  
Richard Domes

June 28, 2024

**GWD File: 90.050.00**  
**Mississauga OP Review**

**The Corporation of the City of Mississauga  
Planning and Building Department  
300 City Centre Drive  
City of Mississauga, Ontario  
L5B 3C1**

**Attention: Ben Philips, Manager, Official Plan & Zoning Services  
Amina Menkad, Project Lead**

**Subject: FORMAL PUBLIC INPUT  
Mississauga Official Plan 2051 (February 2024 Draft)  
3150 and 3170 Golden Orchard Drive  
Block A Registered Plan 726, Part of Lot 6, Concession 1, N.D.S.  
City of Mississauga, Ontario, Ward 3**

**Dear Ben and Amina:**

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to 1212763 Ontario Limited / 1212765 Ontario Limited ("The Azuria Group Inc."), the Registered Owners of 3150 and 3170 Golden Orchard Drive in the City of Mississauga; hereinafter referred to as the "subject site".

The subject site is located at the southwest corner of Golden Orchard Drive and Dixie Road, slightly north of the intersection of Dixie Road and Dundas Street East. It has an area of approximately 2.44 hectares (6.03 acres) and it is currently occupied by two (2) rental apartment buildings (14 and 16 Storeys) containing a total of 238 units.

Situated within the Applewood Neighbourhood Character Area, the current in-force 2010 City Official Plan designates the subject site 'Residential High Density' and 'Greenlands'. Special Site policies restrict the site to a total 328 units, a maximum density of 134 units per hectare (uph), and any "new" development to a maximum height of 7 storeys.

Comprehensive Zoning By-law No. 0225-2007; as amended; zones the subject site 'Greenlands – Natural Hazards (G1)' and 'Residential Apartment 4 - Exception 13 (RA4-13)'. Amongst other performance standards the RA4-13 zoning regulates buildable areas on the property.

The Azuria Group is currently advancing a site specific Official Plan and Zoning By-law Amendment Application to permit two (2) additional 'purpose built' rental apartment buildings (12 and 25 storeys, 487 units). Two (2) separate Pre-Application Consultation

**GAGNON WALKER DOMES LTD.**

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submissions in have been considered by the City's Development Application Review Committee (DARC). Discussion with City, Peel Region, and Toronto Region Conservation Authority (TRCA) staff is ongoing as technical plans, reports, and studies are being refined for formal submission.

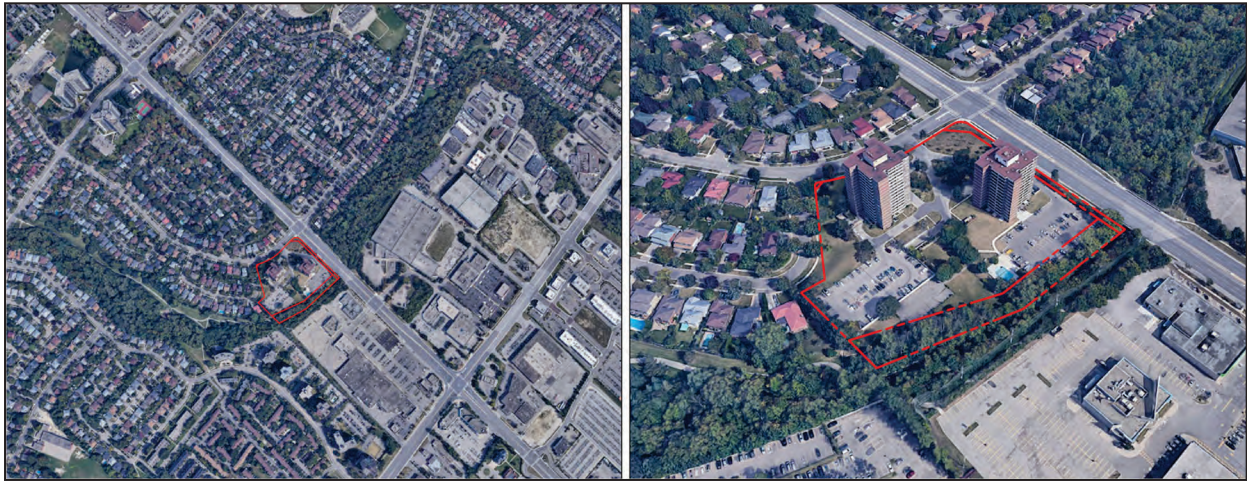


Figure 1 – Aerial Photography of 3150 and 3170 Golden Orchard Drive

### **Mississauga Official Plan 2051 (February 2024 Draft)**

Our office has been monitoring the City's Official Plan Review process closely. We have been asked to review and provide comments, observations, and recommendations on the Draft Mississauga Official Plan 2051 (February 2024). The following is an overview of the designations and overlays that apply to the subject site within latest Draft:

#### **Schedule 1 – City Structure**

- 'Neighbourhood (NHD)' and 'Major Transit Station Area (MTSA)'

#### **Schedule 2 – Natural System**

- 'Natural Hazards'

#### **Schedule 3 – Long Term Street Network**

- Dixie Road 'Region of Peel Arterial'
- Golden Orchard Drive 'Neighbourhood Minor Collector'

#### **Schedule 4 – Long Term Transit Network**

- Dixie Road 'Transit Priority Corridor'
- 'Major Transit Station Boundaries'

#### **Schedule 5 – Long Term Cycling Routes**

- Dixie Road 'Primary On-Road / Boulevard Routes'
- Golden Orchard Drive 'Primary Off-Road Routes'

#### **Schedules 7K / Schedule 10 – Land Use Designations**

- 'Residential High-Rise'
- 'Greenlands'

- 'Natural Hazards' Overlay

#### Schedule 8 – Protected Major Transit Station Areas

- 'DUN-16 / MIL-6' Dixie GO

#### Schedule 8g – Dixie GO PMTSA

- Building Height Schedule '2 to 18 Storeys'
- Land Use Schedule 'Residential High Density', 'Greenlands'

#### Chapter 16 Special Sites

- 'Site 128 (Applewood Neighbourhood)'

### CHAPTER 8 Well Designed Healthy Communities

#### Section 8.6.4 Parking, Servicing and Loading

*"The design of parking, servicing and loading areas is a key component in the development of sites. These areas serve a functional need, but will be designed in a manner that screens less desirable aspects and provides high quality treatment of exposed areas while addressing safe and efficient movement of pedestrians and vehicles. Parking surfaces are a contributor to the urban heat island effect and, as such, will be designed to mitigate the heat effects.*

*8.6.4.1 Parking will be located underground, internal to the building or to the rear of buildings.*

*8.6.4.2 Above grade parking structures should be screened in such a manner that vehicles are not visible from public view and have appropriate directional signage to the structure."*

We interpret 8.6.4.1 as being overly restrictive. Underground parking is encouraged but should not be regulated as being mandatory. It is recommended that Staff revisit this policy prior to finalizing the next Draft to ensure it permits flexibility to allow above grade parking structures, where suitable and appropriate.

### CHAPTER 11 Transit Communities, Section 11.5 Heights

*"11.5.1 Minimum and maximum building heights for Protected Major Transit Station Areas are shown on Schedule 8: Protected Major Transit Station Areas (including Schedules 8a to 8r), and referenced in Table 11-1: Protected Major Transit Station Areas."*

Prior to releasing the next Draft, the Land Use Schedule and Building Height columns within Table 11-1 must be updated to correctly reference Schedules 8a to 8r. It is also strongly recommended that a similar height policy included within MOPA 144 (adopted by Mississauga Council on August 10, 2022, and approved with modifications by Peel Region Council on April 11, 2024) be inserted immediately after the Table:

#### *“5.7.4 Heights*

*5.7.4.1 Building heights for lands within Protected Major Transit Station Areas are shown on Schedule 11: Protected Major Transit Station Areas (including Schedules 11a to 11r), and referenced in Table 5-2: Protected Major Transit Station Areas.*

*5.7.4.2 Development with heights in excess of the limits identified in this Plan may be permitted through a site-specific Official Plan Amendment application, subject to demonstrating, among other matters, the following:*

- a. The City Structure hierarchy associated with the lands is maintained;*
- b. The overall intent, goals, objectives, and policies of the Plan are achieved;*
- c. The type, scale, and built form is appropriate and compatible with surrounding land uses, vision, and the planned context of the area;*
- d. Appropriate site size and configuration;*
- e. Provides for an appropriate transition to adjacent land uses and built forms, that minimizes visual impact, overall massing, shadowing, wind, and overlook;*
- f. Full funding is secured for planned higher-order transit improvements;*
- g. Existing or planned capacity of infrastructure and services such as water and wastewater, street network, community amenities, and multi-modal transportation systems is sufficient; and*
- h. Phasing of development is in accordance with the timing and delivery of infrastructure and services such as water and wastewater and transit infrastructure, including, but not limited to, distribution, connections, capacity, and level of service.”*

The aforementioned policy maintains land uses and maximum heights as originally planned while allowing for the consideration of applications proposing amendments to heights subject to specific criteria.

#### Schedule 8g – Dixie GO PMTSA

Our comments on Schedule 8g specifically relate to the prescribed minimum and maximum building heights of ‘2 to 18 Storeys’. While these heights correctly reflect the current RA4 zoning permissions it does not reflect what can be ultimately be achieved on-site. A maximum has been prescribed without careful analysis and will limit the redevelopment potential of lands where compact transit-oriented development is directed to occur. The subject site is ideally suited for greater intensification on account of its designation, zoning, proximity to the Dixie-Dundas Node, access to existing and future public transit, cycling infrastructure, community facilities and amenities. The site is a prime candidate for assisting Mississauga in achieving their housing objectives over the next decade.

In the interest of directing appropriate intensification within identified PMTSAs we respectfully request that Schedule 8g be modified to reflect a maximum building height of ‘25 Storeys’ on the subject site. This height would facilitate the optimization of the site while upholding the City Structure hierarchy. Our Client’s future planning application will be supported by a myriad of technical plans, reports and studies addressing built form matters including height, floor space index (FSI), lot coverage, and density.



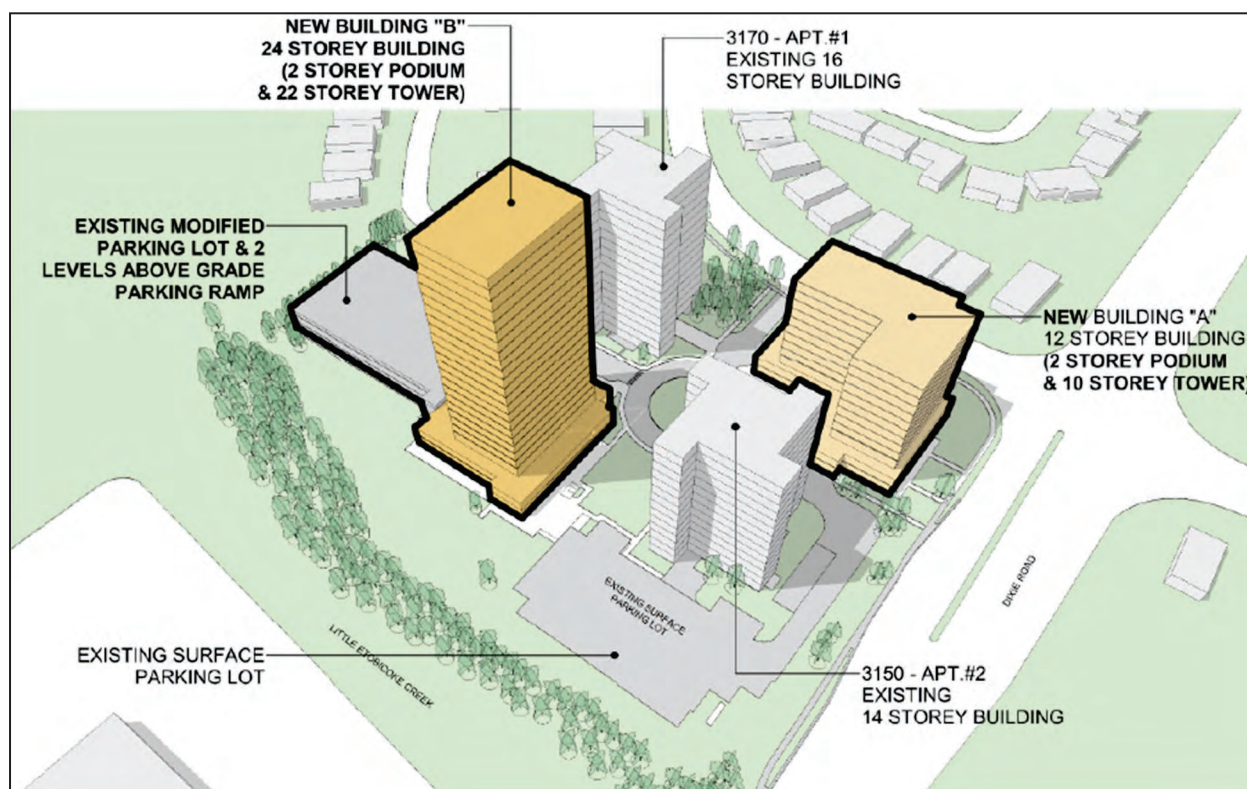


Figure 2 – Conceptual Perspective of Existing and Proposed Apartment Buildings Looking North

## Section 11.7 Urban Design

*“11.7.1 In addition to the Urban Form policies in Chapter 8 of this Plan, additional policies, built form standards and guidelines may be developed, and determined through future planning studies and Local Area Plan reviews.*

*11.7.2 Development will:*

- a. minimize surface parking;*
- b. ensure that where structured parking is proposed, other uses such as residential and non-residential are incorporated, along the periphery of the structure at ground level; and*
- c. contribute to the creation of a high standard of public and private realm streetscape design that is coordinated and comprehensive, which may include street furniture, public art, building forecourts, open space, transit shelters, bicycle parking, tree planting, and the sensitive placement of utilities with consideration for the public and private realm.”*

Like Section 8.6.4.1, we interpret 11.7.2 as being overly restrictive and needs to be updated to permit adequate flexibility. In some cases providing residential and non-residential uses along structured parking is not possible or appropriate.

## Closing Remarks

Thank you for the opportunity to provide public input. We trust that the modifications recommended herein can be accommodated by Staff. While our Client wishes to express

its general support they do have reservations and may provide further comment on the next iteration of the Draft Official Plan as well as any further reports produced in connection with the review exercise.

Yours truly,

  
\_\_\_\_\_  
Marc De Nardis, B.U.R.Pl., M.C.I.P., R.P.P.  
Planning Associate  
[mdenardis@gwdplanners.com](mailto:mdenardis@gwdplanners.com)

C.c. A. Whittemore, City of Mississauga  
1212763 Ontario Limited  
1212765 Ontario Limited





# BOUSFIELDS INC.

Project No. 20167-1

June 13, 2024

City of Mississauga  
c/o Mr. Ben Phillips, Project Manager and Ms. Amina Menkad, Project Lead

Sent via email: [official.plan@mississauga.ca](mailto:official.plan@mississauga.ca)

**Re: Official Plan Review -  
Proposed Mississauga Official Plan 2051  
Comments on behalf of the Rangeview Landowners Group Inc.  
Rangeview Estates, Lakeview Waterfront Major Node ("Rangeview Lands")**

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Bousfields Inc. ("Bousfields") are the planning consultants to the Rangeview Landowners Group Inc. (the "Rangeview LOG") with respect to the Rangeview Estates lands (the "Rangeview Lands") located in the Lakeview Waterfront Major Node, located in southeast Mississauga approximately one kilometre west of the City's eastern limits. On behalf of the Rangeview LOG, please accept the following commentary on the draft Mississauga Official Plan 2051 and please make this commentary available to:

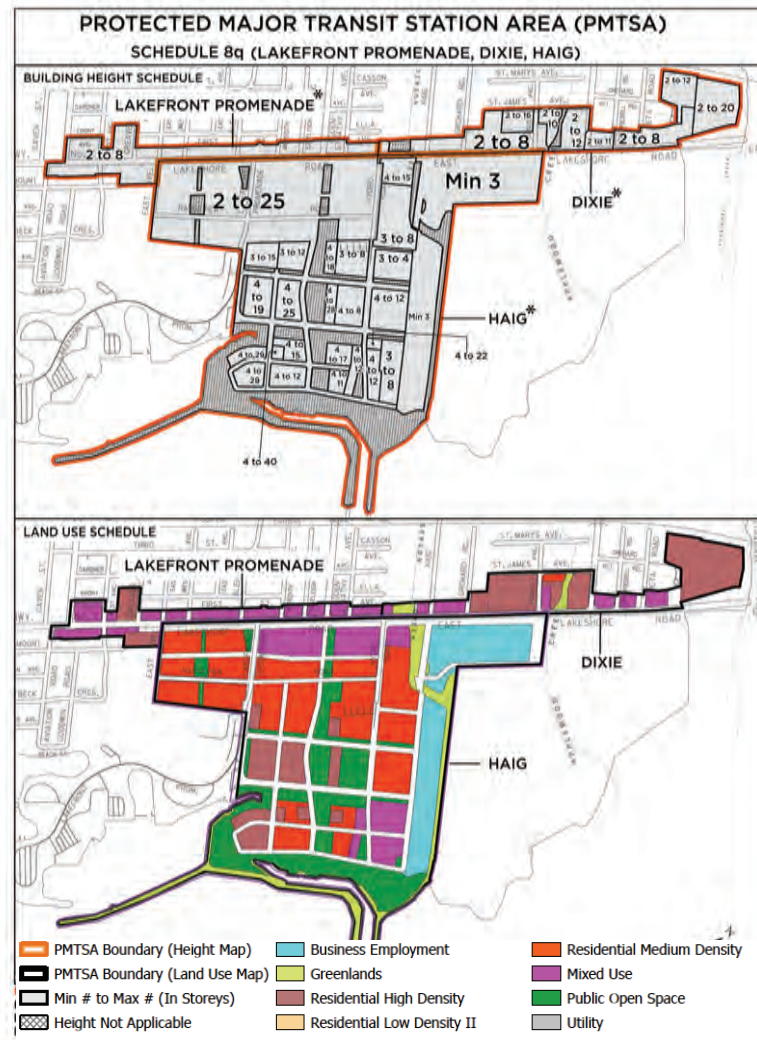
- Mr. Chris Rouse, Director of Development and Design;
- Mr. Hugh Lynch, Manager, Development and Design Division; and,
- Mr. David Breveglieri, Planner, Development South.

## **Rangeview Estates**

The Rangeview Lands, as defined in the Mississauga Official Plan ("MOP"), include the lands located on the south side of Lakeshore Road East between East Avenue and Hydro Road, and include the properties fronting onto both the north and south sides of Rangeview Road.

Comprised of 33 privately-owned parcels with a net area of approximately 21.9 hectares, the Rangeview Lands include a wide variety of light industrial, warehousing, retail, commercial and service commercial uses. The Rangeview Lands contain several existing public roads including East Avenue, Lakefront Promenade, Hydro Road and Rangeview Road.

The Rangeview Lands are designated *Residential Medium Density* and *Mixed Use* in the MOP and are located within the Haig Protected Major Transit Station Area ("PMTSA"), which was approved by the Region of Peel in April 2024. The Haig PMTSA (LBRT-2) has a minimum density target of 300 combined residents and jobs per hectare and a minimum Floor Space Index (FSI) of 1.0. A maximum building height range of 2 to 25 storeys is shown on Schedule 8q.



*Proposed MOP 2051: Schedule 8q Protected Major Transit Station Area (PMTSA)*

## **Background**

The MOP, as amended by Official Plan Amendment 89 (“OPA 89”), provides for the development of up to 3,700 residential units on the Rangeview Lands. On November 15, 2022, a Development Master Plan (“DMP”) application was submitted to the City of Mississauga by Bousfields on behalf of the Rangeview LOG in accordance with the policies of Chapter 13.3 of the MOP.

As part of the DMP application, the DMP report prepared by Bousfields and the accompanying supporting technical studies prepared by other consultants, provided urban design direction and guidance, as well as technical analysis, for the comprehensive redevelopment of the Rangeview Lands into a complete, mixed use, transit-oriented

community that includes a mix of low, medium and high-density residential uses with retail uses provided at strategic locations. A variety of parks and open spaces are also proposed throughout the Rangeview Lands, as well as new public streets, all generally in accordance with OPA 89. The DMP application also requested an increase in permitted residential units from 3,700 to 5,300 units.

Since the original filing of the DMP application in November 2022, the Rangeview LOG and their consultants have been working with municipal staff and the community to address the comments that have been provided. The most recent DMP resubmission was submitted to the City on May 3, 2024, and the Rangeview LOG anticipates that the DMP will be brought forward to Council for endorsement in July 2024, in accordance with Section 13.3.11 of the MOP.

Following the May 2024 DMP Resubmission, Bousfields, on behalf of the Rangeview LOG, filed an Official Plan Amendment (“OPA”) application with the City of Mississauga on May 31, 2024. The OPA application builds on the vision and guiding principles established through the DMP application and seeks to revise specific policies within the Mississauga OP, and to introduce new policies specific to the Rangeview Lands, in order to guide the redevelopment of the Rangeview Lands into a complete, mixed use, transit-oriented community. In this regard, a copy of the draft OPA document that accompanied the May 31, 2024 OPA application is included as **Appendix A**. We respectfully request that the policies proposed in the draft OPA (**Appendix A**) be incorporated into the Mississauga Official Plan 2051.

### **Proposed Mississauga Official Plan 2051**

Bousfields, on behalf of the Rangeview LOG, has reviewed the text and schedules associated with the proposed Mississauga Official Plan 2051<sup>1</sup> (“MOP 2051”) and offer the following comments for consideration and further discussion.

### **Land Use Designation**

The proposed land use designation in the MOP 2051 (Schedule 7) designates the majority of the Rangeview Lands as ‘*Residential High-Rise*’, whereas the current MOP designates these same lands as *Residential Medium Density* (on Schedule 10).

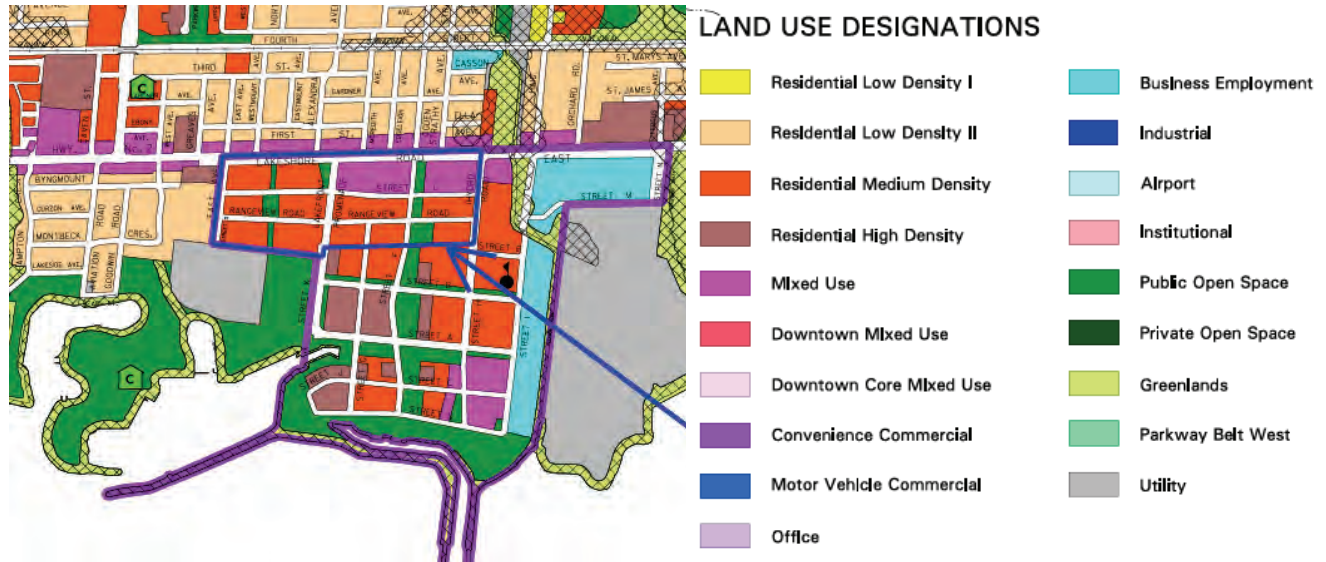
It is our understanding that this proposed land use designation change is part of the City’s shift to a new scale-based residential designation system. As the Rangeview lands are subject to heights of up to 25 storeys in the Haig PMTSA, the proposed ‘*Residential High Rise*’ land use designation is intended to reflect this. Therefore, we are supportive of the

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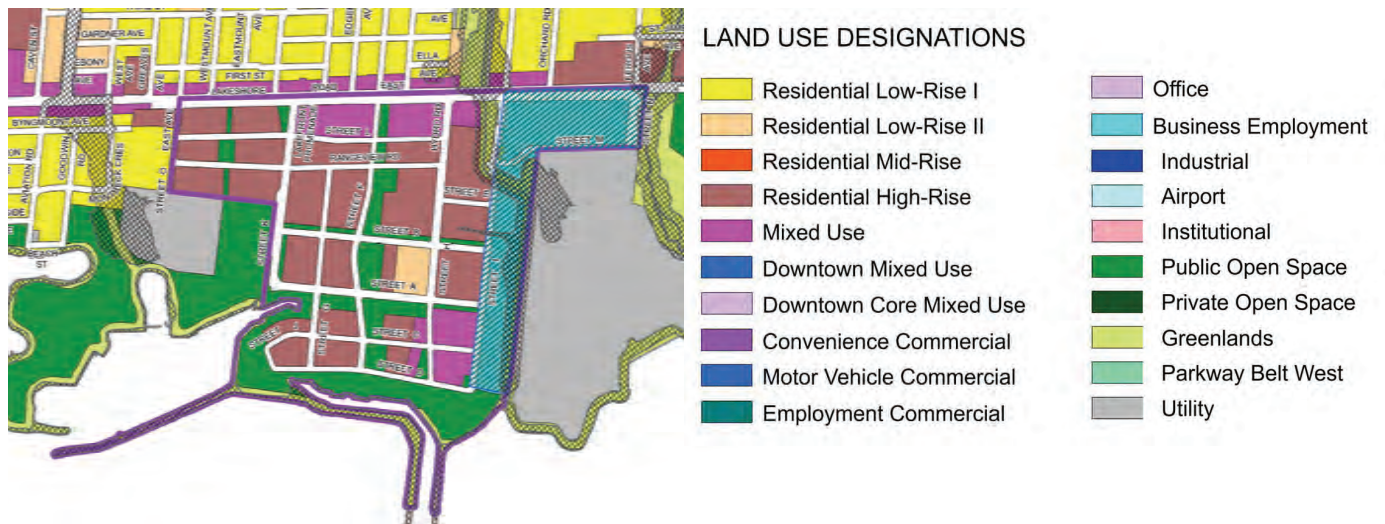
<sup>1</sup> Released to the public on March 18, 2024



'Residential High-Rise' land use designation applying to the majority of the Rangeview Lands.



*MOP: Schedule 10 Land Use Designations*



*Proposed MOP 2051: Schedule 7 Land Use Designations*

### **Number of Units**

Policy 13.3.8.3.8 and corresponding Table 1 (Chapter 13.3.4) of the MOP provides that the total number of units permitted on the Rangeview Lands is 3,700 units. The DMP application and the OPA application (as described above) request a total of 5,300 units on the Rangeview Lands. In our opinion, this requested increase in units is appropriate from

a land use planning perspective, given the Lands location within a PMTSA, and the supporting technical transportation and servicing reports demonstrate that the additional units can be successfully accommodated. Further, we note that the proposed draft OPA document (**Appendix A**) amends Table 1 to reflect the requested 5,300 units.

We respectfully request that the MOP 2051 revise Table 1 in Chapter 13.3.4 to be consistent with the Total Residential Unit count and Distribution of Built Form provided in Table 1 of **Appendix A**.

### **Future Enhanced Transit Route**

Schedule 6, Long Term Transit Network, in the MOP identifies a 'Future Enhanced Transit Route' through the Rangeview Lands and the Lakeview Village lands located to the south. More specifically, the 'Future Enhanced Transit Route' is shown along Lakefront Promenade/Street G, Street D and Hydro Road/Street J. The current alignment will support the mixed-use development proposed on the Rangeview Lands, in addition to the mixed-use development approved on the Lakeview Lands. Therefore, we are supportive of the current alignment of the 'Future Enhanced Transit Route' as shown on Schedule 6 of the MOP.

### **Conclusion**

We understand that the City of Mississauga intends to bring forward the final draft of the MOP 2051 for Council adoption in the fall of 2024. We respectfully request to be notified of any meetings, reports and/or decisions of Committee and/or Council with respect to this matter, including any public consultation prior to the adoption of the Mississauga OP 2051.

Thank you in advance for your consideration and we look forward to working with you through this process. If you require any clarification or wish to discuss these matters further, please do not hesitate to contact me. We would also be pleased to meet with you to discuss the contents of this letter.

Yours very truly,

**Bousfields Inc.**



Stephanie Kwast, MCIP, RPP  
Partner

cc. *Delta Urban c/o Myron Pestaluky & Andrew Lam*  
*Lindsay Dale-Harris Consultant and Mediation c/o Lindsay Dale-Harris*



Amendment No. XX  
to  
Mississauga Official Plan

May 31, 2024

By-law No. \_\_\_\_\_

A by-law to Adopt Mississauga Official Plan Amendment No. X

WHEREAS in accordance with the provisions of section 14 or 21 of the *Planning Act*, R.S.O. 1990, c.P.13, as amended ("*Planning Act*") Council may Adopt an Official Plan or an Amendment thereto;

AND WHEREAS, pursuant to subsection 17(10) of the *Planning Act*, the Ministry of Municipal Affairs and Housing authorized the Regional Municipality of Peel ("Region" or "Regional"), an approval authority, to exempt from its approval any or all proposed Local Municipal Official Plan Amendments;

AND WHEREAS, Regional Council passed By-law Number 1-2000 which exempted all Local Municipal Official Plan Amendments adopted by local councils in the Region after March 1, 2000, provided that they conform with the Regional Official Plan and comply with conditions of exemption;

AND WHEREAS, the Commissioner of Public Works for the Region has advised that, with regard to Amendment No. XX, in his or her opinion the amendment conforms with the Regional Official Plan and is exempt;

AND WHEREAS, Council desires to adopt certain amendments to the Mississauga Official Plan regarding changes to the policies to reflect the mixed use community identified in the Rangeview Estates Development Master Plan and includes revisions to increase the number of permitted units, the distribution of units by built form, the parks and open space network and other revisions necessary in order to implement the Rangeview Estates Development Master Plan within the Lakeview Waterfront Major Node Character Area;

NOW THEREFORE the Council of The Corporation of the City of Mississauga ENACTS as follows:

1. The document attached hereto, constituting Amendment No. XX to Mississauga Official Plan, is hereby adopted.

ENACTED and PASSES this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Signed \_\_\_\_\_  
MAYOR

Signed \_\_\_\_\_  
CLERK

May 31, 2024

**Amendment No. X**

**To**

**Mississauga Official Plan**

The following text and Maps “X” to “X” attached constitute Amendment No. X.

Also attached but not constituting part of the Amendment are Appendices I, II and III.

Appendix I is a description of the Public Meetings held in connection with this Amendment.

Appendix II is a copy of the Planning and Building Department report dated XXX, 2024, pertaining to this Amendment.

Appendix III is a map showing a potential location for an educational facility.

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## **PURPOSE**

The purpose of this Amendment is to revise the policies pertaining to the Lakeview Waterfront Major Node Character Area to increase the number of permitted units for Rangeview Estates, revise the distribution of units by built form, revise the parks and open space network and include new policies to implement the Rangeview Estates Development Master Plan within the Lakeview Waterfront Major Node Character Area;

The Amendment further revises the boundaries of the Residential Medium Density, Mixed Use and Public Open Space designations to reflect the amended configuration of the block structure and public open space network on the subject lands, as per the Rangeview Estates Development Master Plan.

## **LOCATION**

The lands affected by this Amendment are located on the south side of Lakeshore Road East, between East Avenue and Hydro Road, and include the properties fronting onto both the north and south sides of Rangeview Road. The subject lands are located in the Lakeview Waterfront Major Node Character Area and identified as the Rangeview Estates Precinct in the Mississauga Official Plan.

## **BASIS**

The Mississauga Official Plan came into effect on November 14, 2012, save and except for the outstanding site-specific appeals to the Ontario Land Tribunal.

The subject lands are in part designated Residential Medium Density, permitting a range of dwelling types including townhouses to mid-rise apartments as well as apartments in taller buildings. The lands are also designated Mixed Use and Public Open Space, which permit a variety of commercial and residential uses, public parks and areas for conservation and flood control, respectively.

The Official Plan is being amended to reflect the master plan developed through the Rangeview Estates Development Master Plan process. Amendments include revisions to the parks and open space layout, an increase in the total residential unit count to 5,300, revisions to the distribution of units by built form, and the inclusion of new policies appropriate for the implementation of this Amendment.

The proposed Amendment is acceptable from a planning standpoint and should be approved for the following reasons:

1. The proposal introduces a new 25.7-hectare mixed-use community that is envisioned as a vibrant, liveable and complete residential neighbourhood

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that serves as a gateway for the entire Lakeview Waterfront Major Node, from Lakeshore Road east to the shores of Lake Ontario.

2. The proposal realizes an integrated mixed-use community with a strong park network and land allocated for residential and commercial uses as well as new public streets and is in keeping with the Rangeview Estates Development Master Plan. A total of 5,300 units are permitted on the subject lands.
3. The subject lands are identified as a Strategic Growth Area, a Major Node, within a Major Transit Station Area and are adjacent to planned higher order transit, making it an excellent candidate to accommodate greater height and densities.
4. The new, mixed-use community will introduce housing opportunities that will allow residents to take advantage of the planned future Lakeshore Bus Rapid Transit corridor and other regional and local transit opportunities in the surrounding area.
5. A contextually appropriate mix of low, mid-rise and taller buildings are proposed and which are appropriate given Rangeview's proximity to planned higher order transit and its direct relationship with the approved Lakeshore Village development.
6. As part of the commitment to the development, 2.62 hectares of parkland in the form of five new public parks will be dedicated to the City of Mississauga. The provision of parkland and publicly accessible private open spaces will connect Rangeview seamlessly with the approved open space network in the Lakeview Village development.



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## DETAILS OF THE AMENDMENT AND POLICIES RELATIVE THERETO

1. Schedule 1 – Urban System, of the Mississauga Official Plan, is hereby amended by changing the boundaries of the Green System, as shown on Map “1” of this Amendment.
2. Schedule 1A – Urban System – Green System, of the Mississauga Official Plan, is hereby amended by changing the boundaries of the Green System, as shown on Map “2” of this Amendment.
3. Schedule 4 - Parks and Open Spaces, of Mississauga Official Plan, is hereby amended by changing the boundaries of the Public and Private Open Spaces as shown on Map “3” of this Amendment.
4. Schedule 8 – Designated Right-of-way Widths, of Mississauga Official Plan, is hereby amended by including Street ‘L’ and Street ‘G’ and associated right-of-way widths as shown on Map “4” of this Amendment.
5. Schedule 10 – Land Use Designations, of Mississauga Official Plan, is hereby amended by changing the land use designations as shown on Map “5” of this Amendment.
6. Section 13.3.6 Complete Communities, of Mississauga Official Plan, is hereby amended by deleting existing Policy 13.3.6.1.
7. Section 13.3.7 Multi-Modal City, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

*Development that would result in exceeding the permitted total number of residential units set out in Table 1 in Policy 8. below may be permitted without an amendment to the Mississauga Official Plan provided that studies are undertaken to the satisfaction of City Council demonstrating that the increase in the total number of units can be accommodated by the master servicing plan and the physical infrastructure identified in Policy 13.3.7.1.2 of the Mississauga Official Plan, including the multi-modal transportation network, and the proposed development is generally in keeping with the intent of the Council endorsed Development Master Plan for Rangeview Estates.*

8. Section 13.3.8 Desirable Urban Form, of Mississauga Official Plan, is hereby amended by deleting Table 1 as it pertains to Rangeview Estates and replacing it with the following:

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Table 1: DISTRIBUTION OF HOUSING AND UNIT TARGETS FOR RANGEVIEW ESTATES							
Precinct	Total Residential Unit	Built Form					
		Townhouses (All Types)**		Mid-Rise Buildings (5 to 8 storeys)		Taller Buildings (9 to 15 storeys)***	
		Maximum Number of Units	% of Townhouses	Maximum Number of Units	% of MidRises	Maximum Number of Units	% of Taller Buildings
Rangeview Estates	5,300*	700	10-15%	1,650	25-40%	3,000	45-60%

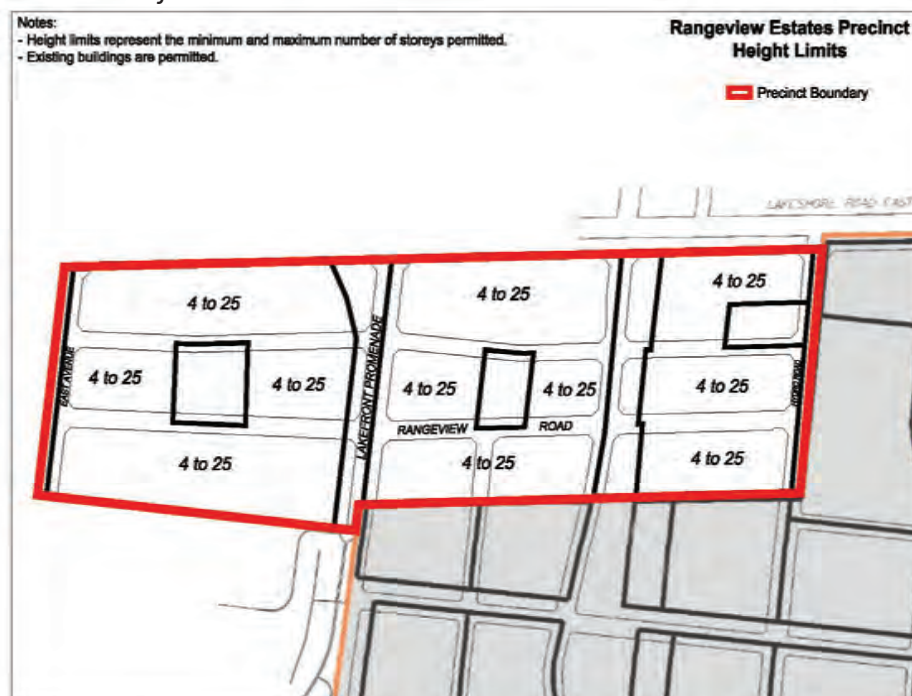
\* Development shall be generally in keeping with the intent of the approved Development Master Plan for Rangeview Estates

\*\* Townhouses (all types) and low-rise apartments up to 4-storeys

\*\*\* A limited number of taller buildings from 16 to 25 storeys may be considered in Rangeview Estates and Ogden Green Precincts subject to a Height Study.

9. Section 13.3.8.3, Precincts, of Mississauga Official Plan, is hereby amended by deleting existing Figure 7, Distribution of Built Form.
10. Section 13.3.8.3, Precincts, of Mississauga Official Plan, is hereby amended by adding the following, and renumbering the policies thereafter:

*13.3.8.3.X Development within the Rangeview Estates Precinct will be in accordance with the minimum and maximum height limits as shown on Map X. The appropriate heights within these ranges will be determined by the other policies of the Lakeview Waterfront Major Node Character Area.*



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Map X, Rangeview Estates Precinct Height Limit

11. Section 13.3.8 Desirable Urban Form, of Mississauga Official Plan, is hereby amended by adding the following policy and renumbering the policies thereafter:

*The Rangeview Waterfront Development Master Plan represents the development master plan for the Rangeview Estates Precinct. Development within the Rangeview Estates Precinct shall be generally in keeping with the intent of the layout, built form and principles outlined in the Rangeview Development Master Plan.*

12. Section 13.3.8 Desirable Urban Form, of Mississauga Official Plan, is hereby amended by adding the following policy and renumbering the policies thereafter:

*Notwithstanding Policy 13.3.8.3.9, to increase the amount of public and private amenity space on Rangeview Estates, heights in excess of the limits identified in Table 1 and the policies of this plan as it pertains to Rangeview Estates may be considered subject to demonstration of the following:*

- *the total maximum units for the Rangeview Estates Precinct will not exceed 5,300 units, having regard for Policy 7. above;*
- *taller buildings may be combined with mid-rise and/or low-rise buildings on the same block;*
- *townhouses may be located in the base of mid-rise and/or taller buildings;*  
*and*
- *an urban design control document may be required and will include among other things, phasing, height and distribution of buildings.*

13. Section 13.3.8 Desirable Urban Form, of Mississauga Official Plan, is hereby amended by adding additional locations to Policy 13.3.8.3.10 as follows:

- *Along East Avenue*
- *Along Lakefront Promenade*
- *Along Ogden Avenue*
- *Along Ogden Park*
- *Along Hydro Road*

14. Section 13.3.8 Desirable Urban Form, of Mississauga Official Plan, is hereby amended by deleting Policy 13.3.8.3.11 and replacing it with the following:

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- a. *Mid-rise buildings will be required to front Lakeshore Road East, and may also be located along other street frontages in the Rangeview Estates Precinct.*

15. Section 13.3.8 Desirable Urban Form, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

- a. *Taller buildings set back from Lakeshore Road East may be connected to mid-rise buildings fronting Lakeshore Road East, provided they are set back a minimum of 20 metres.*

16. Section 13.3.8 Desirable Urban Form, of Mississauga Official Plan, is hereby amended by deleting the words “will be required” and replacing them with “will be encouraged” in Policy 13.3.8.3.12.

17. Section 13.3.10 Land Use Designations, of Mississauga Official Plan, is hereby amended by deleting Policy 13.3.10.2.1 and replacing it with the following:

*Notwithstanding the Residential Medium Density policies of this Plan, the following uses are permitted:*

- *apartment dwellings of a low, mid-rise and taller built form up to 25 storeys;*
- *uses permitted in the Residential Medium Density designation, accessory to apartment dwellings on the same property; and,*
- *uses permitted in the Mixed Use designation are permitted at grade in apartment dwellings.*

18. Section 13.3.10 Land Use Designations, of Mississauga Official Plan, is hereby amended by deleting Policy 13.3.10.3.1 subsection (a) and subsection (b) and replacing it with the following:

*Notwithstanding the Mixed Use policies of this Plan, the following will apply:*

- a. *commercial uses will be encouraged on the ground level of buildings fronting Lakeshore Road East between Lakefront Promenade and Hydro Road;*

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- b. *single use residential buildings may be permitted on lands not fronting Lakeshore Road East between Lakefront Promenade and Hydro Road;*

19. Section 13.3.10 Land Use Designations, of Mississauga Official Plan, is hereby amended by adding the following subsections to Policy 13.3.10.3.1 as follows:

*Notwithstanding the Mixed Use policies of this Plan, the following will apply:*

- a. *Development on Mixed Use sites that includes residential uses will be encouraged to contain a mixture of permitted uses on the ground level of buildings fronting Lakeshore Road East between Lakefront Promenade and Hydro Road;*
- b. *Developments that consist primarily of residential uses, with non-residential uses at grade only, will not be required to submit an Official Plan Amendment;*
- c. *Redevelopment within Mixed Use designated lands that results in a loss of non-residential floor space will not be required to maintain or replace the existing total amount of non-residential floor space as part of the redevelopment.*

20. Section 13.3.10 Land Use Designations, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

- a) *Educational facilities will be combined with another permitted use in the same building to create compact urban form.*
- b) *Educational facilities are not included in the maximum height and/or calculation of maximum density assigned to any parcel of land that it is constructed on.*
- c) *Where an educational facility is located on a parcel of land within the Rangeview Estates Precinct, additional density may be permitted on that parcel of land through the rezoning process without any requirement for an official plan amendment.*

21. Section 13.3.10 Land Use Designations, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

- a. *In the event that a site on the Rangeview Estates lands is identified for an education facility in Appendix III and is not needed for that*



*use, in whole or in part, such site may alternatively be used for the underlying land use designation without requiring an amendment to the Mississauga Official Plan.*

- b. *In the event that a site on the Rangeview Estates lands is identified for an educational facility in Appendix III, it may be re-located without requiring an amendment to the Mississauga Official Plan.*

22. Section 13.3.10 Land Use Designations, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

- a. *If required, the precise location, size and phasing of an educational facility shall be determined through the subdivision approval process or site plan approval process.*

23. Section 13.3.10 Land Use Designations, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

- a. *Residential development may be permitted in conjunction with the development of an educational facility as a mixed use development without requiring an amendment to the Mississauga Official Plan. For clarity, for the purposes of this policy, the term “mixed use” refers to a building that is designed to provide for an educational facility below, at, or above grade, above which are residential units.*

24. Section 13.3.11.6 Implementation, of Mississauga Official Plan, is hereby amended by deleting Policy 13.3.11.6 and replacing it with the following:

*Area wide studies including but not limited to the following will be completed prior to zoning by-law amendment approval:*

- a. *Transportation Study (e.g. road network and capacity analysis, active transportation connections and enhanced transit assessment) that addresses the unit count for the Rangeview Estates Lands (5,300 units) in accordance with Table 1 in Policy 8. above, and the unit count for the Ogden Green, Cultural Waterfront lands (8,050 units) in Table 1, Distribution of Housing and Unit Targets by Precinct, in Section 13.3.8 Desirable Urban Form of the Mississauga Official Plan.*

May 31, 2024

25. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by adding the following to the end of existing Policy 13.3.11.10:

*“Proponents of development applications must demonstrate that all site contamination and remediation matters are resolved, to the satisfaction of City staff, prior to full building permit release.”*

26. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by adding the following to the end of existing Policy 13.3.11.11:

*“Proponents of development applications must demonstrate that all site contamination and remediation matters are resolved, to the satisfaction of City staff, prior to full building permit release.”*

27. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by adding the following to the end of existing Policy 13.3.11.12:

*“Proponents of development applications must demonstrate that all site contamination and remediation matters are resolved, to the satisfaction of City staff, prior to full building permit release.”*

28. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by replacing the words “development application” with “zoning by-law amendment application” in existing Policy 13.3.11.14 so that it reads as follows:

*“Land use compatibility assessments are to be undertaken for new residential and other sensitive land uses at the time of a zoning by-law amendment application.”*

29. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by deleting Policy 13.3.11.15 in its entirety and replacing it with the following:

*To ensure the appropriate and orderly development of the site and to ensure that the costs associated with development are equitably distributed among all landowners, the City will require that a cost sharing agreement and/or front end agreement among the landowners has been executed to address distribution of costs and municipal and community infrastructure, lands and facilities associated with development in a fair and equitable manner. Individual developments will not be approved and/or released for final approval or registration until the subject landowner becomes party to the landowners’ cost sharing agreement and the Trustee of said agreement has certified to the City that the landowner is in good standing and has satisfied their*

May 31, 2024

*obligations under the landowners cost sharing agreements and related agreement(s). The City will insert this as a condition of subdivision approval, site plan approval and/or other development approval for the subject landowner.*

30. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by deleting Policy 13.3.11.18 in its entirety and replacing it with the following:

*In accordance with Sections 37(6)(7) and (8) of the Planning Act, the owners of land may provide the municipality with facilities, services or matters required because of development or redevelopment in the area, and the value attributed to such facilities, services or matters shall be deducted from the community benefits charge. Opportunities for increased height and/or density permissions may be considered where such in-kind contributions can be provided.*

31. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

*13.3.11.X At the time of a zoning by-law amendment application, park boundaries will be confirmed and opportunities for privately-owned publicly accessible space (POPs) shall be provided.*

32. Section 13.3.11 Implementation, of Mississauga Official Plan, is hereby amended by adding the following Policy and renumbering the policies thereafter:

*13.3.11.X Applicants may propose land for parkland dedication in accordance with Section 42(4.30) of the Planning Act, as amended from time to time, including privately-owned publicly accessible spaces (POPs) and land with encumbrances underneath.*

*May 31, 2024*

## **IMPLEMENTATION**

Upon the approval of this Amendment by the Council of the Corporation of the City of Mississauga, Mississauga Official Plan will be amended in accordance with this Amendment.

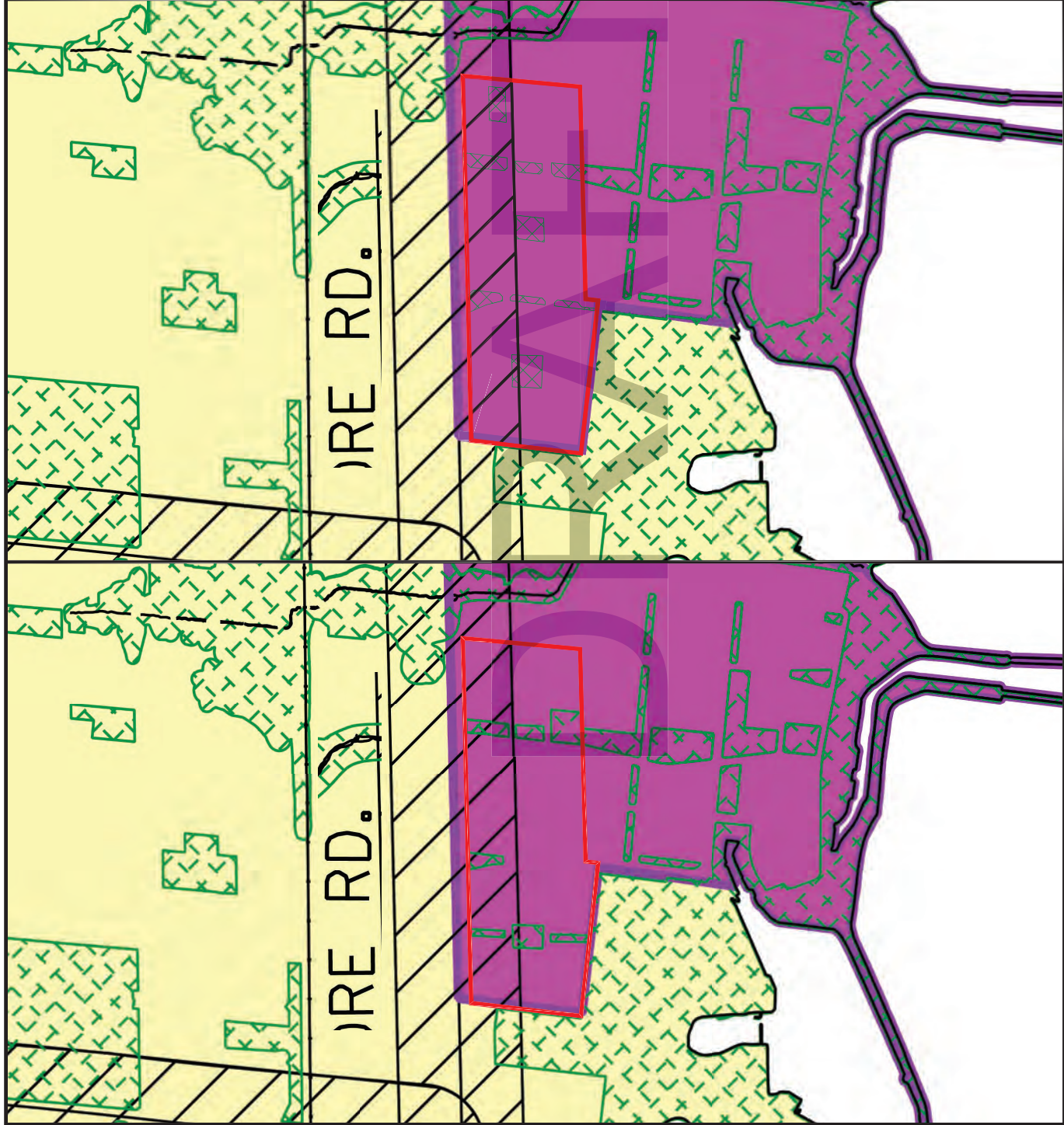
The lands will be rezoned at a later date to implement this Amendment.

This Amendment has been prepared based on the Office Consolidation of Mississauga Official Plan March 4, 2024.

## **INTERPRETATION**

The provisions of Mississauga Official Plan, as amended from time to time regarding the interpretation of that Plan, will apply in this regard to this Amendment.

This Amendment supplements the intent and policies of Mississauga Official Plan.



# Green System

Green System

## City Structure

Downtown

Major Node

Community Node

Neighbourhood

Corporate Centre

Employment Area

Special Purpose Area

## Corridors

Corridor

Intensification Corridor

AREA OF AMENDMENT:

REVISION TO THE URBAN  
SYSTEM IDENTIFYING PUBLIC  
OPEN SPACE AS PART OF THE  
GREEN SYSTEM



Map 1

Part of Schedule 1

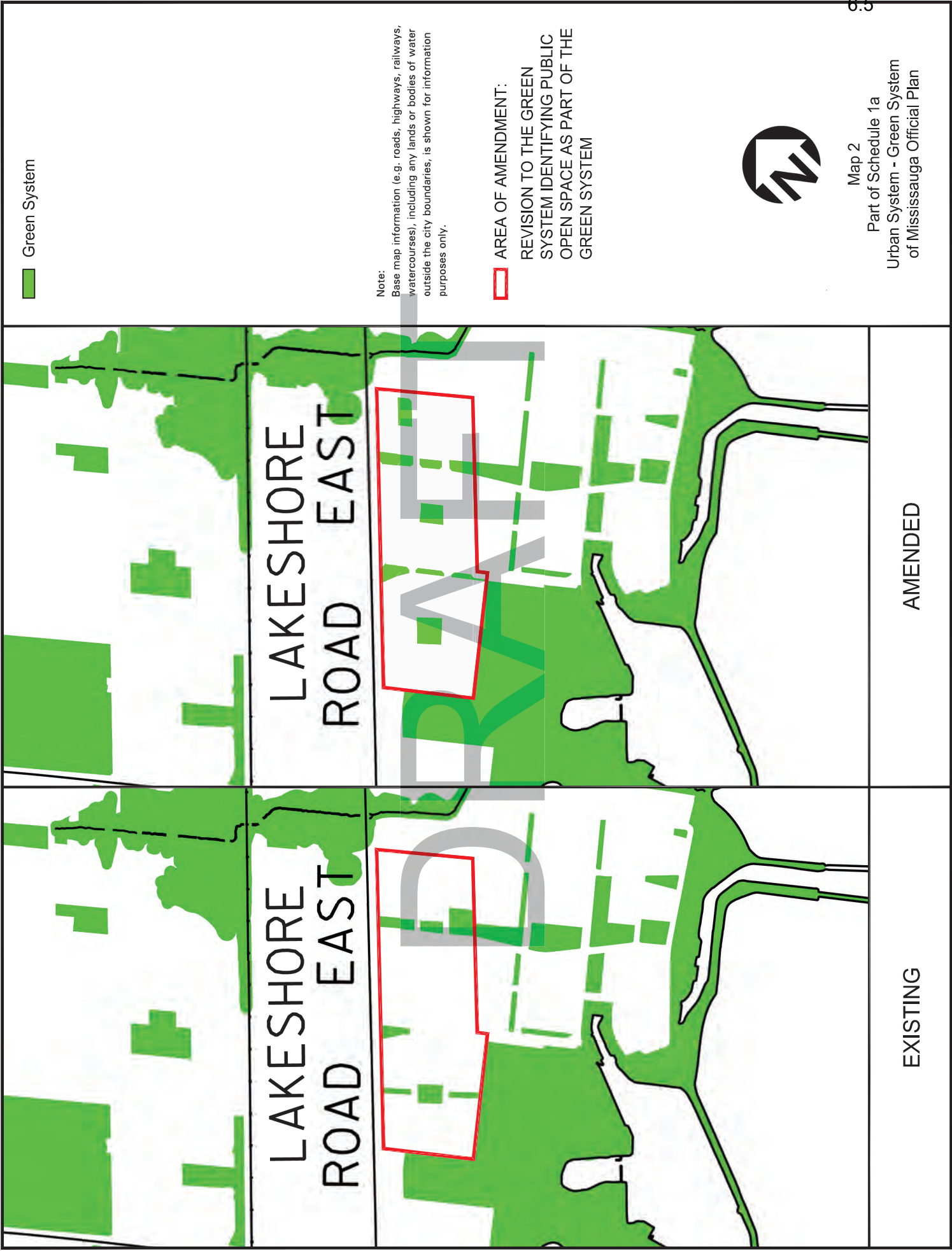
Urban System

of Mississauga Official Plan

EXISTING

AMENDED





Green System

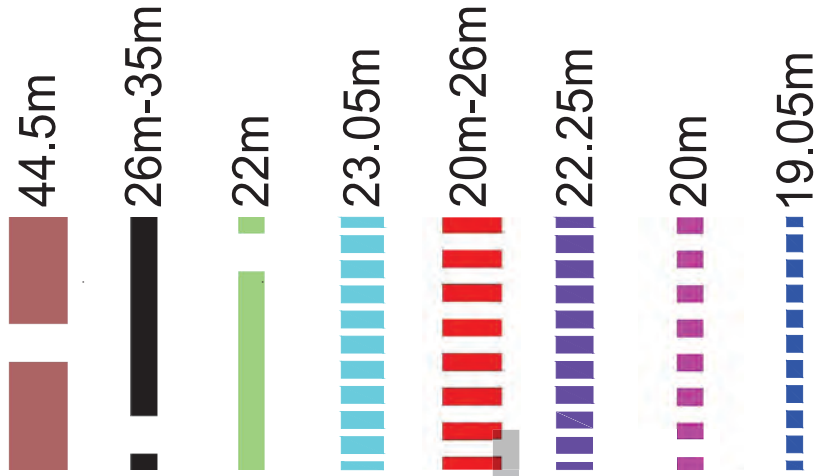
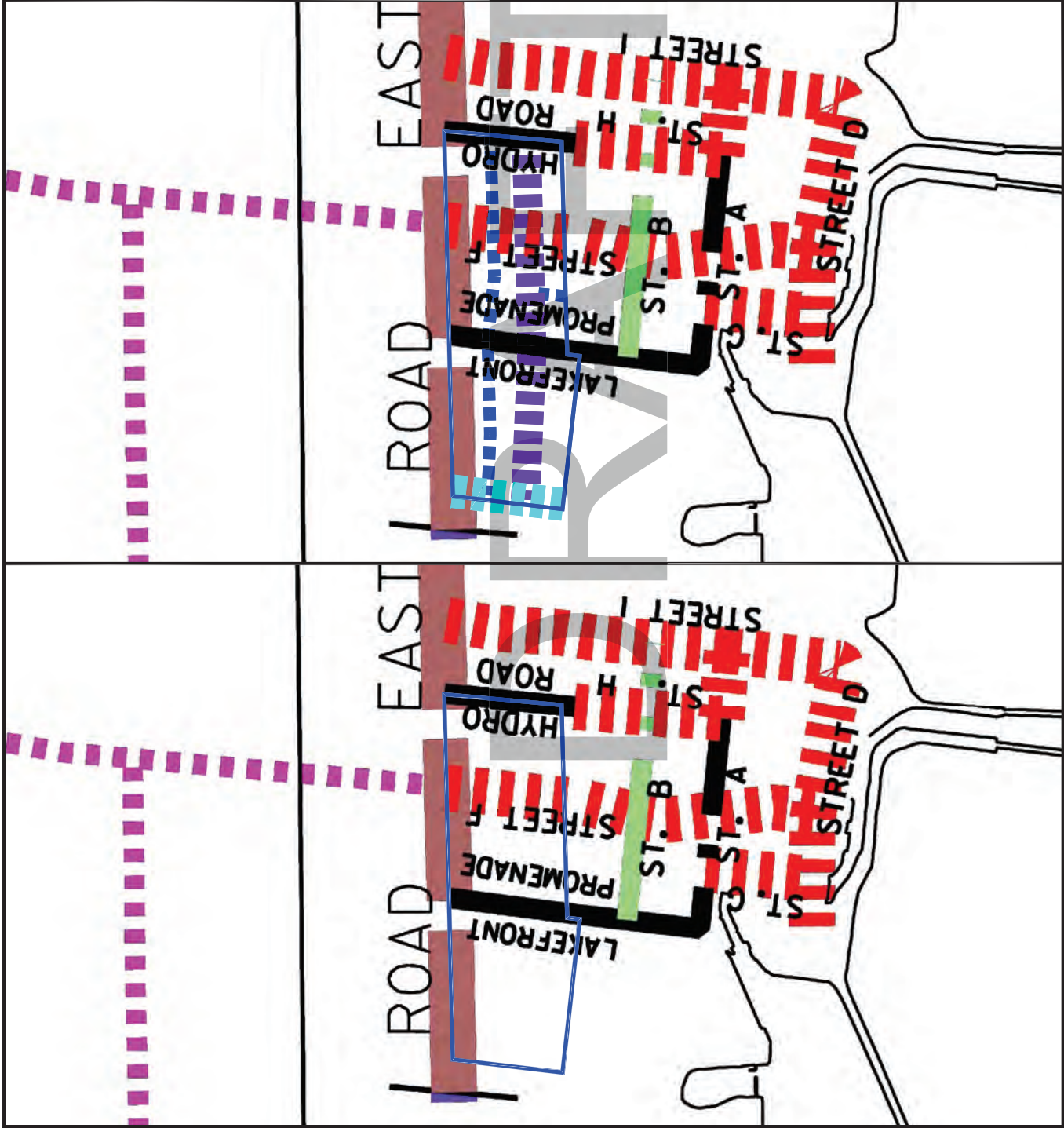
Note:  
Base map information (e.g. roads, highways, railways, watercourses), including any lands or bodies of water outside the city boundaries, is shown for information purposes only.

AREA OF AMENDMENT:  
REVISION TO THE GREEN  
SYSTEM IDENTIFYING PUBLIC  
OPEN SPACE AS PART OF THE  
GREEN SYSTEM









AREA OF AMENDMENT:  
REVISION TO DESIGNATED  
RIGHT-OF-WAY WIDTHS







**AREA OF AMENDMENT:**

REVISION TO LAND USE DESIGNATIONS TO CHANGE THE LOCATION OF PUBLIC OPEN SPACE, RESIDENTIAL MEDIUM DENSITY AND MIXED USE AREAS





# APPENDIX III



## Legend

- ☐ Rangeview Estates Precinct
- ☐ Development Block Boundaries
- ☐ Public Open Space
- ☐ Residential Medium Density
- ☐ Mixed Use
- ☐ Potential Educational Facility





Canada Lands Company  
Société immobilière du Canada

June 25, 2024

Amina Menkad, Project Lead  
Ben Phillips, Project Manager  
Planning and Development  
City of Mississauga  
527- 300 City Centre Drive  
Mississauga, ON  
L5B 3C1

Dear Amina & Ben

**Re: Draft Official Plan—City of Mississauga Letter  
1 Port Street East, Mississauga**

---

### **Background**

Canada Lands Company CLC Limited ("Canada Lands"), is the owner of the lands municipally known as 1 Port Street East ("the subject lands"). Currently, there is an approved Master Plan and Official Plan Amendment with the City of Mississauga ("the City") for the subject lands to support the City's vision for seeing a multi- residential community with numerous amenities supporting affordable housing, commercial space, parks, and open space. The subject site abuts Lake Ontario and is surrounded by green space on the west side, and residential buildings on the north side. The site can be accessed via Port Street East.

We would like to thank you for meeting with us on June 7, 2024 and providing an opportunity to speak about the City's Official Plan update that the City of Mississauga is looking to implement and how it relates to the vision outlined for 1 Port Street East.

As the City is seeking to work through finalizing the Draft Official Plan, Canada Lands would like to submit questions and comments for consideration prior to the submission to Council in early Fall 2024.



## Questions & Comments

### Natural Hazard Lands

Section 17.17.1 states “As a condition of development approval, natural hazard lands may be placed in public ownership for their long term protection.” We are seeking clarification for when a site *may* be placed in public ownership: is there a list of criteria to reference for when this may apply, or is it identified during a pre-consultation of a development application? If this is determined in a pre-consultation meeting, is there an opportunity for additional clarification surrounding the restraints and opportunities for designated Natural Hazard Lands.

Thank you for the opportunity to participate and provide feedback in the Draft Official Plan process.

Respectfully,

Jacob Larsen, MCIP, RPP  
Senior Development Manager



Partners: 6.5

Glen Broll, MCIP, RPP

Colin Chung, MCIP, RPP

Jim Levac, MCIP, RPP

Jason Afonso, MCIP, RPP

Karen Bennett, MCIP, RPP

*In Memoriam, Founding Partner:*

Glen Schnarr

June 28, 2024

GSAI File: 1315-002

(Via Email)

Mr. Ben Phillips

Project Manager, Official Plan Review

Planning &amp; Building Department

City Planning Services Division

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan Review - Comments**  
**CRW 1 LP and CRW 2 LP**  
**2077-2105 Royal Windsor Drive, City of Mississauga**

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Glen Schnarr & Associates Inc. (“GSAI”) is pleased to submit this correspondence on behalf of our client, CRW 1 LP and CRW 2 LP, being the registered owner of 2077-2105 Royal Windsor Drive.

This letter is to state concerns for the recently presented draft City of Mississauga Official Plan (the “**Draft MOP**”).

There are specific policies found in the Draft MOP, such as those provided in Section 11.3 (Land Uses) which are problematic or concerning for current and future development applications. For example, Policy 11.3.2 regarding the replacement of non-residential gross floor area reads as follows:

*‘Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment.’*

This policy as drafted has the potential to negatively influence mixed-use development applications, especially those in Major Transit Station Areas. The policy is rigid. It appears to be a response to redevelopment proposed for mixed-use sites or plaza sites. However, it fails to balance the relevant considerations that go into whether there should be replacement of non-residential gross floor area. Recognizing that non-residential gross floor area is relevant to serving


the community needs of existing and planned neighbourhoods, requiring a 1:1 replacement ratio (or close to) can be detrimental to the optimization of available lands and could result in unintended or unplanned vacancies of non-residential units based on existing and future demand. The replacement of non-residential floor area is better evaluated through an understanding of market conditions/demand and a geographical evaluation of the access and amount of floor space area provided to immediate and surrounding residential and non-residential uses. The policy as proposed is too generic, does not address issues of planned function in consideration of market catchment area, and will act as a detriment to future development applications which introduce the right uses, at the right time, in the right parts of the City.

Thank you for the opportunity to provide these comments. Our Client, the Owners, wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, M.C.I.P., R.P.P.  
Managing Partner

June 28, 2024

GSAI File: 1101-004

(Via Email)

Mr. Ben Phillips

Project Manager, Official Plan Review

Planning &amp; Building Department

City Planning Services Division

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051**  
**2226 Royal Windsor GP Inc. / South Shore Asset Management Group and its**  
**related entities**  
**Various Properties, City of Mississauga**

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Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to 2226 Royal Windsor GP Inc. / South Shore Asset Management Group and its related entities, the current and potential future 'Owner' of a number of sites which are generally located north and south of Royal Windsor Drive, on the west side of Southdown Road, in the City of Mississauga (the 'Subject Lands'). On behalf of the Owner, we are pleased to be providing this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

Firstly, we submit that the concerns expressed by GSAI in our Comment Letter, dated March 15, 2024, remain relevant for the purposes of this submission, however, for brevity will not be repeated here.

The Subject Lands related to this submission are shown on the " Preliminary Ownership Plan" enclosed with this submission and municipally addressed, as follows:

Ref No.	Municipal Addresses	Ref No.	Municipal Addresses
1.	2057 Royal Windsor Drive	17.	2257 Royal Windsor Drive
2.	1018 Southdown Road	18.	2226 Royal Windsor Drive
3.	1022 Southdown Road	19.	885 Avonhead Road
4.	1032 Southdown Road	20.	900 Southdown Road
5.	1052 Southdown Road	21.	884 Southdown Road
6.	1110 Southdown Road	22.	844 Southdown Road
7.	2077-2105 Royal Windsor Drive	23.	806, 816 & 820 Southdown Road
8.	2133 Royal Windsor Drive	24.	758, 780, 788 Southdown Road



9.	2157 Royal Windsor Drive	25.	688 Southdown Road
10.	2167 Royal Windsor Drive	26.	592-606 Southdown Road
11.	2175 Royal Windsor Drive	27.	566 Southdown Road
12.	2215 Royal Windsor Drive	28.	556 Southdown Road
13.	2235 Royal Windsor Drive	29.	452 Southdown Rd
14.	2301 Royal Windsor Drive	30.	385 Southdown Rd
15.	2265 Royal Windsor Drive	31.	2111 Lakeshore Rd W.
16.	2255 Royal Windsor Drive	32.	2100 Lakeshore Rd. W

The Subject lands are generally situated within the southwest portion of the City of Mississauga. Presently, this greater area of the City hosts a range of land uses including (however not limited to) industrial, commercial and residential uses. The Subject Lands are also situated adjacent to and proximal to the Clarkson GO Station.

With respect to the City's DRAFT Official Plan as related to the above-stated sites, the following is relevant information:

#### Schedule 1 – City Structure:

- Lands within a certain (500-800m) radius of the Clarkson GO Station are situated within the limits of the Major Transit Station Area ('MTSA');
- The entirety of the Subject Lands are situated within the Southdown Employment Area (including the MTSA lands).

#### Schedule 7 – Land Use Designations:

- Lands situated on the southwest and northwest corner of the intersection of Southdown Road and Royal Windsor Drive are designated "Employment Commercial";
- Other lands under existing or potential ownership of our Client are designated either Business Employment, Industrial or Utility.

#### Schedule 8 – Protected Major Transit Station Areas

- Lands within a certain radius of the Clarkson GO Station are situated within the limits of the Clarkson GO Protected Major Transit Station Area ('PMTSA') and are subject to new Schedule 8r of the City's Official Plan (*as well as the ongoing Clarkson MTSA Master Planning work*);
- The Lands within the PMTSA under existing or future ownership of our Client are designated either 'Mixed Use' or 'Business Employment'.

It is apparent per policy direction at the local and Provincial level, that within the limits of the PMTSA, a range of land uses and intensification opportunities should be considered. We understand that presently the City is undertaking a Master Plan exercise related to the future of the Clarkson MTSA lands, which includes but is not limited to, implementing the findings of the completed Land Use Compatibility Study and several visioning exercises to determine the best or most optimal use of the lands. While our Client does have interest in lands situated within the limits of the MTSA, there are lands under existing or future potential

ownership which are located beyond the limit of the MTSA – more specifically, lands located south of the MTSA boundary. It is our understanding that none of these lands (beyond the MTSA boundary) are presently being considered for redevelopment or even a redesignation. GSAI has concerns with the long-term impacts of providing inherently restrictive land use policies in an area where there is potential for growth.

It is recognized that the City of Mississauga, historically, has directed growth and development in a manner which isolates or segregates certain uses from each other, such as employment uses and residential uses. However, moving forward, the City (as well as the Province and Region) have prioritized integrated living where residents can live and can coexist with employment uses. In response to this shift, we believe that there is an opportunity to recognize the Subject Lands (both within and beyond the limits of the MTSA) in the context of the changing nature of the City of Mississauga, specifically when evaluated against evolving economics and land use planning which prioritizes a sustainable jobs/housing balance. This vision is only possible through the strategic use and implementation of land use planning tools (i.e., Official Plan designations, Zoning By-law permissions) which better realize and implement the vision for the City.

We are of the opinion that the Subject Lands should be given further consideration to permit non-employment related land uses on site, as this would support the long-term municipal, regional and provincial planning objectives. Specifically, we would request that the Subject Lands be re-designated to 'Mixed Use Limited' through the City's Official Plan review or a subsequent house keeping amendment.

GSAI has always maintained the position that a more progressive planning use approach, which allows for greater flexibility in certain areas of the City, should be employed. Again, this is consistent with the City's shift away from the segregation of land uses, towards complete communities where residents can live, work, and play while having access to higher order transit opportunities.

In addition to the points stated above, due to the proximity of some of the Subject Lands to the Clarkson GO MTSA limit, if the Subject Lands were developed for a mix of uses in the future, this would facilitate an appropriate transition from heavier Employment uses, to the existing mix of uses located to the east (Clarkson, Lorne Park, Port Credit) and north of the Subject Lands and ultimately, put the Subject Lands to better use. GSAI's view of the MTSA limits is that it falls short to realizing the full potential of this MTSA as certain lands, such as the Subject Lands, are as proximate, or even closer to the existing transit infrastructure centred around the Clarkson GO station as compared to other MTSA lands. Reviewing and redesignating these lands now provides the opportunity for an appropriate realignment of the MTSA limit in the future.

Although we recognize there is potential for employment uses on the Subject Lands, which might reflect a more traditional, industrial or office built form, there is a distinct opportunity to redevelop the Subject Lands for mixed-use development. The lands located west of our Client's existing and future holdings, have historically been developed for employment uses which are mostly industrial in nature. However, the lands east and north of the Subject Lands currently provide for a mix of uses such as residential, commercial/retail, community, institutional and office uses. This affords the Subject Lands a unique opportunity to be redeveloped in a way that respects the character of the area, is a logical extension of these



non-employment uses, while providing both employment and residential opportunities. As such, the request herein is reflective of the future vision for the City of Mississauga. We recognize that should these lands be considered for sensitive, non-employment uses, land use compatibility will need to be evaluated in order to determine the appropriateness or feasibility of sensitive uses. The City may choose to incorporate policies in the Official Plan which speak to this, similar to those presented in other areas of the City.

We believe that by providing for redevelopment opportunities of the Subject Lands through assignment of a Mixed Use Limited land use designation (and appropriate implementing Zoning), these instruments will support the City's vision for more urbanized, transit oriented, mixed-use neighbourhoods and put to better use underutilized lands. Further, the redesignation(s) will support the City's commitment to Housing, while maintaining the ability to accommodate jobs. The redesignation will further contribute to a desirable mix and intensity of uses therefore contributing to planning objectives of the Provincial Policy Statement, the Regional Official Plan, and the City's Official Plan.

In summary, we are concerned about the proposed policy directions outlined in the Draft OP and request that modifications as identified throughout this letter be made on the basis that the Subject Lands are within the Regional and local Urban Area, are in proximity to existing and planned transit services as well as a multitude of services and uses to meet daily needs, are appropriately positioned to accommodate a better use of land, infrastructure and resources and can support the achievement of Provincial and local policy objectives, especially in the midst of a Provincial housing crisis

Thank you for the opportunity to provide these comments. Our Client, the Owners, wishes to be included in all further engagement related to the OP Review Initiative and wishes to be informed of updates, future meetings, and the ability to review and provide comments on the final Official Plan prior to adoption by Council.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

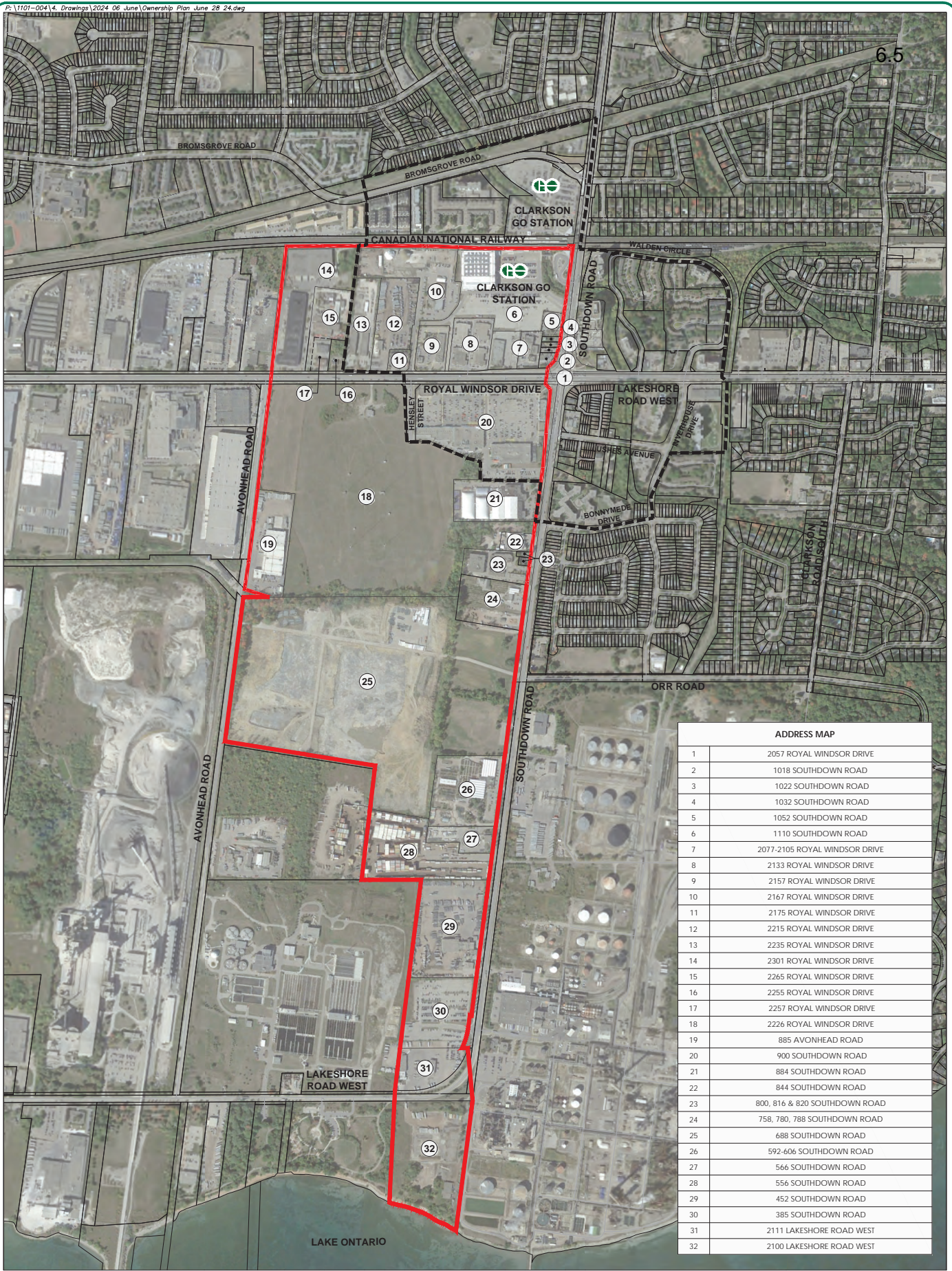
**GLEN SCHNARR & ASSOCIATES INC.**

Glen Broll, MCIP, RPP  
Managing Partner

c. Councillor A. Tedjo, Ward 2

encl. Preliminary Ownership Plan





ADDRESS MAP	
1	2057 ROYAL WINDSOR DRIVE
2	1018 SOUTHDOWN ROAD
3	1022 SOUTHDOWN ROAD
4	1032 SOUTHDOWN ROAD
5	1052 SOUTHDOWN ROAD
6	1110 SOUTHDOWN ROAD
7	2077-2105 ROYAL WINDSOR DRIVE
8	2133 ROYAL WINDSOR DRIVE
9	2157 ROYAL WINDSOR DRIVE
10	2167 ROYAL WINDSOR DRIVE
11	2175 ROYAL WINDSOR DRIVE
12	2215 ROYAL WINDSOR DRIVE
13	2235 ROYAL WINDSOR DRIVE
14	2301 ROYAL WINDSOR DRIVE
15	2265 ROYAL WINDSOR DRIVE
16	2255 ROYAL WINDSOR DRIVE
17	2257 ROYAL WINDSOR DRIVE
18	2226 ROYAL WINDSOR DRIVE
19	885 AVONHEAD ROAD
20	900 SOUTHDOWN ROAD
21	884 SOUTHDOWN ROAD
22	844 SOUTHDOWN ROAD
23	800, 816 & 820 SOUTHDOWN ROAD
24	758, 780, 788 SOUTHDOWN ROAD
25	688 SOUTHDOWN ROAD
26	592-606 SOUTHDOWN ROAD
27	566 SOUTHDOWN ROAD
28	556 SOUTHDOWN ROAD
29	452 SOUTHDOWN ROAD
30	385 SOUTHDOWN ROAD
31	2111 LAKESHORE ROAD WEST
32	2100 LAKESHORE ROAD WEST

## PRELIMINARY OWNERSHIP PLAN

CITY OF MISSISSAUGA,  
REGIONAL MUNICIPALITY OF PEEL

### LEGEND

-  SUBJECT LANDS
-  CLARKSON GO MTA AREA



SCALE 1:4500  
JUNE 28, 2024

 **GSAI**  
Glen Schmitt & Associates Inc.



By Email

City of Mississauga

Attention:

Amina Menkad, Project Lead

Ben Phillips, Project Manager

Email: [official.plan@mississauga.ca](mailto:official.plan@mississauga.ca)

July 4, 2024

Dear Amina Menkad and Ben Phillips:

**Re: Oxford Properties Group Comments on Draft Mississauga Official Plan 2051**

Urban Strategies Inc. (“Urban Strategies” and “we”) are planners representing Oxford Properties Group (“Oxford”) and the registered owners (OMERS Realty Management Corporation, Square One Property Corporation, ARI SQ1 GP Inc., OPG SQ1 Holdings Inc. and ARI SQ1 Holdings Inc.) of Square One Mall and surrounding lands in Mississauga’s Downtown Core. We are pleased to submit this letter on Oxford’s behalf to summarize comments on the Draft Mississauga Official Plan 2051, released for public comment as part of the City’s Official Plan Review. Oxford is a key stakeholder and partner in the ongoing urbanization of the Downtown Core, and has a long history of engaging with the City on policy-making to realize a shared interest in good planning and development on the Square One Lands and beyond.

The following comments identify areas where we believe the draft Official Plan policies require revision. We request that these comments be addressed prior to Council’s final consideration of the Draft Mississauga Official Plan 2051.

**Comments on the Draft Mississauga Official Plan 2051 policies**

**Draft Section 7.3.4.6:** This draft policy provides that: “When lands are subdivided, the City may require public ownership for pedestrian and cycling facilities or vehicular access to create local street connections to existing developed or undeveloped lands.” We request that this policy be revised to reflect the possibility of private ownership with an easement for public access.

**Draft Section 8.2.13:** This amended policy provides that: “Development will have restorative net ecological benefits on a site through the practice of sustainable building and site design.” This policy as written does not make it clear what is meant by net ecological benefit or what is required of an applicant. Requiring a net ecological benefit may not be the best approach for compact urban sites. We request that this policy be removed.



**Draft Section 8.6.2.5:** This policy relates to transitions between buildings with different heights, and suggests the general application of a 45-degree angular plane as one of the means of providing transition. We believe that transition policies such as this should not be applicable to the Downtown Core, which is planned for the greatest heights and densities in the city. We request that the policy be revised to clarify that it is not applicable to developments in the Downtown Core.

**Draft Section 8.6.3.14:** This amended policy relates to the requirement for site development to preserve mature trees on public and private lands. The preservation of trees should be weighed against the benefits of new development. We request that the policy be revised to provide direction to preserve mature trees where possible.

**Draft Section 12.1.1.6:** This draft policy provides that: “Proponents of development applications within the Urban Growth Centre may be required to demonstrate how new development contributes to a concentration and mix of jobs as a key component of a mixed-use transit-supportive development.” The concentration and mix of jobs is an objective of the Urban Growth Centre and will be achieved over time through the range of uses permitted in the given land use designations. Individual applications should not have to demonstrate how development contributes to this broader objective. We request that this policy be removed. In general, Oxford suggests that the policies include stronger recognition of the contribution that retail and commercial uses make to providing jobs in the Downtown Core.

**Draft Section 12.2.3.4:** This section amends the description of the vision for the Rathburn District. The draft amended text refers to the Rathburn District as a “prestigious *employment area*” whereas neither the Rathburn District nor any other part of the Downtown Core are designated Employment Areas in the in-force Official Plan or on draft Map 15-1: Employment Areas. The description of the Rathburn District also includes a reference to a park providing east-west pedestrian connection. It is not clear which park is being referenced in this description. One Public Open Space is currently designated at the northeast corner of Living Arts Dr and Rathburn Rd W. Because the drafted text is inconsistent with the land use framework for the area, we request that the draft description of the Rathburn District be revised to not describe the area as an employment area and to limit the description of parks to the designated Public Open Space.

**Draft Section 12.2.3.7:** This section proposes a revised description of the vision for the Square One District. The revised description makes reference to “introducing a series of parks and open spaces throughout the District.” While future development may introduce new open spaces, the reference to a series of parks is inconsistent with the in-force Land Use schedule of the Official Plan and the long-standing planning arrangements for the Square One lands relating to parkland. We request that the section be revised to refer simply to open spaces.

**Draft Section 12.2.4.4** This policy provides that: “It is strongly encouraged to incorporate office uses as part of a primarily residential development to promote greater employment opportunities

and increase vibrancy within the Downtown Core.” The Official Plan land use designations permit office uses in certain mixed use designations and is sufficient for establishing office uses in certain locations. Based on the permissions of the mixed use designation, presumably applicants will include office uses where market conditions permit. It is not clear what strongly encouraged means as it relates to specific development applications. We recommend this policy be removed.

**Draft Section 12.2.5.3 and Draft Map 12-2.3:** Draft Section 12.2.5.3 provides that: “Existing, as well as future park sites and pedestrian connections are conceptually located in Map 12-2.3, where its [sic] final location and size will be determined through individual development applications.” We note that Map 12-2.3 identifies new “Future Public Parks” in locations that are inconsistent with the Public Open Spaces designated in the in-force Official Plan Land Use schedule. In some instances, the identified “Future Public Parks” are in locations where privately-owned public open spaces have already been approved or proposed. In general, the Map was not created with landowner input and does not reflect past or on-going discussions regarding potential future open spaces in the Downtown Core. We request that Map 12-2.3 be revised to remove the Future Public Parks symbols from Oxford-owned properties.

**Draft Section 12.2.6.2:** This draft section provides that: “Any amendment to the City of Mississauga Official Plan or Zoning By-Law proposing residential development shall address the adequacy of public service facilities, including publicly funded schools, to serve the projected needs of residential growth. The City will work in collaboration with the school board(s) to determine the location of public service facilities through the development application process.” We do not believe it is reasonable to require every Official Plan and zoning amendment to address the adequacy of public service facilities in a broader area. We also note that with respect to school facilities, Council Resolution 0152-1998 requires applicants to make satisfactory arrangements only prior to rezoning or Draft Plan of Subdivision approval, and not as part of Official Plan Amendment Applications. We therefore request that Draft Section 12.2.6.2 be revised to require applicants to “assess” rather than “address” the adequacy of public service facilities and to clarify that any arrangements related to school facilities would be required prior to rezoning or Draft Plan of Subdivision approval.

**Draft Section 12.2.9.8:** This draft section amends the permitted uses in the Downtown Core Mixed Use land use designation, which is currently defined in the Downtown Core Local Area Plan in the in-force Official Plan. The revised permitted uses for this designation no longer include: commercial parking facility, financial institution, major office, makerspaces, overnight accommodation, personal service establishment, post-secondary educational facility, restaurant, retail store, and secondary office. We are unsure of the intention of this proposed revision. In our view, the removal of these uses in the list of permitted uses for the Downtown Core Mixed Use designation is incompatible with the existing function, in-force planning framework, and planned function of the areas subject to this land use designation, including the Square One Mall and surrounding lands. Many of the uses removed from the list are fundamental components of

successful mixed-use development and for realizing the vision for the Downtown as a vital urban centre. We request that this draft section be revised to clarify that all permitted uses listed in in-force Section 11.1.4.2 of the Downtown Core Local Area Plan are permitted in the Downtown Core Mixed Use designation.

**Draft Schedule 7 Land Use Designations:** The legend for this draft schedule includes the incorrect colour for the Downtown Mixed Use land use designation. We request that the colour be corrected.

**In conclusion**

Thank you for considering the above comments on the Draft Mississauga Official Plan 2051. As indicated in the introduction to this letter, we request that these comments be addressed and reflected in subsequent drafts of the Plan prior to consideration by City Council. We would be pleased to discuss any of these comments with you at your convenience.

Sincerely,

**URBAN STRATEGIES INC.**

Per:



Josh Neubauer MCIP, RPP  
Partner

CC: Oxford Properties Group



July 11, 2024

Amina Menkad  
Mississauga Planning & Building Department  
City Planning Strategies Division  
300 City Centre Drive  
Mississauga, ON  
L5B 3C1

**Greater Toronto  
Airports Authority**  
P.O. Box 6031  
3111 Conway Drive  
Toronto, ON M1E 0T6  
Canada L5P 1B2  
T: 416-776-3000  
F: 416-776-7746  
GTAA.com

RE: **Draft Mississauga Official Plan 2051**  
**Comments from Greater Toronto Airports Authority ("Toronto Pearson")**

Hi Amina:

We would like to thank the City of Mississauga for the opportunity to share our comments on updates to the City's Official Plan. Toronto Pearson supports Mississauga's long-term vision and policies.

Toronto Pearson looks forward to continuing to build on the strong working relationship between our two organizations. Whether it be collaborating on transit and sustainability solutions, or promoting economic growth and workforce development, we know that by working together, we can continue to build the city residents and employers have come to expect.

After reviewing the proposed Official Plan Update, the following is a list of our comments on the updated chapters of the Draft Official Plan 2051:

## **Chapter 4: Sustaining the Natural Environment**

### **4.13 Noise**

#### **Aircraft Noise**

Our Master Plan reserves for a sixth runway to accommodate projected passenger growth anticipated by 2032. The proposed future sixth-runway configuration will require an update to the current Transport Canada noise contours, likely impacting areas not currently covered by the existing contours. The Transport Canada noise system has not yet been updated to account for the future sixth runway.

The definitions used here (i.e. residential, industrial and office) for lands within the Airport Operating Area (AOA) should be broadened to describe an overall employment area that is significant to the City







and the broader country. The employment uses in the AOA provide a natural buffer against sensitive land uses and form, with the employment lands in Brampton and Toronto, Canada's second largest employment zone. This economic area's unique size and diversity should be recognized in the Official Plan.

#### 4.13.7

- This section needs clarification to specify the noise contour line as 30NEF/NEP, which forms the approximate boundary of the Airport Operating Area. We are providing below two possible definitions of the AOA for inclusion in the updated Official Plan.

***Option 1** - For ease of implementation of the provincial and municipal land use policies for noise-sensitive land uses, the City of Mississauga, in conjunction with Toronto Pearson, has defined a fixed Airport Operating Area (AOA) based on the 30 NEP/NEF Composite Noise Contour. The AOA, illustrated on Map 4-1, establishes and stabilizes the aircraft noise area for the purpose of land use planning, which benefits both the air carriers and the surrounding communities.*

***Option 2** - For ease of implementation of the provincial and municipal land use policies for noise-sensitive land uses, the City of Mississauga, in conjunction with Toronto Pearson, has defined a fixed Airport Operating Area (AOA) based on the 30 NEP/NEF Composite Noise Contour. The AOA perimeter approximates the location of the 30 NEP/NEF line by following readily identifiable natural (waterways), transportation (roads, rail lines) and planning (property and land use designation boundaries) features. The AOA, illustrated on Map 4-1, establishes and stabilizes the aircraft noise area for the purpose of land use planning, which benefits both the air carriers and the surrounding communities.*

In addition, we request that there be a reference to the proposed Provincial Planning Statement (2024) section 3.4.2 – *Airports*, which prohibits sensitive land uses above the 30NEF/NEP contour.

#### 4.13.8

- For the City's requirement of notification to tenants and purchasers for proposals in this noise category, we would like to see a transparent process for administering this. Residential uses above the 25NEF have been shown to result in frequent and vigorous noise complaints from owners and tenants. We want to ensure tenants and purchasers clearly understand how aircraft noise can impact them.

#### 4.13.9





- We continue to support the intent of this section but want to ensure that all buyers and tenants are provided with every opportunity to be aware of the noise conditions and potential impacts.

#### 4.13.11

- We note that the term “feasibility noise impact study” can be ambiguous, and we propose to replace it with “detailed noise impact study.” Furthermore, we strongly advise that a post-construction noise study/verification be undertaken to ensure residential units in noise-sensitive areas fully comply with all applicable noise guidelines.

We propose the following changes to this section, with the following wording:

*4.13.11 Development applications for sensitive land uses including new residential dwellings, with the exception of replacement detached and semidetached dwellings, for lands where permitted within the Airport Operating Area, may be processed for approval provided that all of the following are satisfied:*

- a. a detailed noise impact study will be submitted as part of every development application to verify that mitigated indoor and outdoor noise levels will not exceed the sound level limits established by the applicable Provincial Government environmental noise guidelines;*
- b. appropriate conditions relating to noise mitigation that are consistent with the findings of the detailed noise impact study, are included in any final approval;*
- c. a post-construction noise study and/or testing is undertaken to confirm, to the satisfaction of both the City of Mississauga and Toronto Pearson, that all mitigation measures and features prescribed in the detailed noise impact study have been implemented and that they satisfy the applicable Provincial Government environment noise guideline, and*
- d. an Aircraft Noise Warning Agreement between the City of Mississauga, the Greater Toronto Airports Authority (or its successor) and the Developer, is required as part of any approval.*

## **Chapter 7 – Getting Around our Communities**

### **7.10 Airport:**

As part of this chapter, we would like to see the inclusion of additional context around Toronto Pearson’s significant role in Mississauga’s economy. The following is our suggested wording: *Toronto*

July 11, 2024  
Page 4 of 4



*Pearson is Canada's largest airport and a major transportation facility and destination within Mississauga. It serves an important regional, national, and international role by transporting passengers and goods.*

*Toronto Pearson is home to 400+ companies that employ over 50,000 people and facilitate over 6% of Ontario's GDP. The airport is at the centre of Canada's second-largest employment area and, with its neighbouring business community, is a national economic catalyst that benefits the City of Mississauga.*

*7.10.1 Mississauga will work with Toronto Pearson and other stakeholders to facilitate transit and active transportation access to and from the Airport and surrounding employment lands, with consideration of the Airport's future multi-modal transportation hub.*

*7.10.2 Mississauga will support goods movement access to the Airport to promote the Airport as a key goods movement hub.*

*7.10.3 Mississauga will cooperate with the Federal Government and Toronto Pearson to ensure that new construction is compatible with the requirements of the Airport, including height limitations, navigational aids, visibility and communications.*

*7.10.4 Mississauga recognizes the economic importance of the airport to the surrounding employment areas and will work to ensure it can grow its economic potential to meet existing and future employment and industry needs.*

Thanks again for providing Toronto Pearson with the opportunity to provide input into the updated Official Plan. Feel free to contact me if you would like to discuss any of the comments or proposed changes.

Thank you,

A handwritten signature in blue ink, appearing to read "N. Oliveira", with a stylized flourish at the end.

Nelson Oliveira  
Director, Engineering and Architectural Services

cc. Bernardo Gogna, Vice President, Airport Planning & Technical Services  
Karen Mazurkewich, Vice President, Stakeholder Relations & Communications



# FIRST GULF

August 12, 2024

Ben Phillips, MCIP, RPP  
Official Plan Review  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

Sent by email to: [official.plan@mississauga.ca](mailto:official.plan@mississauga.ca), [ben.phillips@mississauga.ca](mailto:ben.phillips@mississauga.ca)

RE: Official Plan Review, 2395 Speakman Drive

Please accept this letter as a formal request to be added as an interested party to the Official Plan Review process being conducted by the City. We acknowledge and appreciate the City's efforts to review the Official Plan and request to participate in this process.

First Gulf is the authorized representative of 2395 Speakman Limited Partnership, owners and managers of the land located at 2395 Speakman Drive, within the Sheridan Park Corporate Centre.

It is requested that the subject land retain all permitted uses in the Business Employment designation and that the draft policy, 15.17.4.1.2 regarding accessory uses, be revised to provide more flexibility for the size of an accessory use. The draft policy currently restricts accessory commercial, daycare, and manufacturing uses to 15% of the total gross floor area within an enclosed building and restricts manufacturing to 30% when accessory to a scientific research and development facility. It is recommended that the City remove the specific maximum gross floor area policies from the Official Plan, to support accessory uses, but note that the use must be accessory to a primary use and that the size is determined through zoning and site plan control. This would allow for Official Plan policy to support site specific zoning by-law amendments or minor variances without the requirement for amendment to the Official Plan. This would be a significant step to help simplify the development process required to redevelopment these lands and promote their marketability to potential businesses.

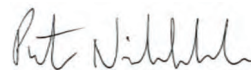
First Gulf requests to be notified of all project notifications including notice of any proposed changes, draft policies, public and council meetings, and we look forward to having an opportunity to meet with the Official Plan Review team to further discuss our position.

Please direct acknowledgment of receipt of this letter and project notices to the undersigned.

Sincerely,



Peter Henley  
Senior Development Manager  
[phenley@firstgulf.com](mailto:phenley@firstgulf.com)



Peter Nikolakakos  
Executive Vice President, Development  
[pnikolakakos@firstgulf.com](mailto:pnikolakakos@firstgulf.com)

August 22, 2024

Ben Phillips, MCIP, RPP  
Official Plan Review  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

Sent by email to: [official.plan@mississauga.ca](mailto:official.plan@mississauga.ca), [ben.phillips@mississauga.ca](mailto:ben.phillips@mississauga.ca)

RE: Official Plan Review, 2350 Sheridan Park Drive

On behalf of Process Research Ortech Inc., owner of lands located at 2350 Sheridan Park Drive, within the Sheridan Park Corporate Centre, we are writing to you to request to be added as an interested party to the Official Plan Review process being conducted by the City.

We request that our land retain all permitted uses in the Business Employment designation. The draft policy needs to support the opportunity to expand our business and provide flexibility to add accessory uses, like warehousing and manufacturing through a simple development process. Science and Innovation needs an integrated approach to produce innovation and scientific silos nowadays do not work well in driving innovation.

Process Research Ortech Inc. requests to be notified of all project notifications including notice of any proposed changes, draft policies, public and council meetings. We also look forward to having an opportunity to meet with staff to discuss our position and inform the City of our operations and potential future growth that could be restricted by the proposed limitation on accessory uses.

As business owners in the community, we look forward to future discussion and working collaboratively with the City of Mississauga.

Sincerely,

Sankar DasGupta Ph.D., DIC, FCAE, FIMMM  
Director, Process Research Ortech.  
Executive Chair: Electrovaya Inc.,  
9053997450



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

March 15, 2024

Ben Philips  
Manager, Official Plan & Zoning Services  
City Planning Strategies Division, Planning & Building Dept  
City of Mississauga  
300 City Centre Dr, 7<sup>th</sup> Floor  
Mississauga, ON L5B 3C1

e: [official.plan@mississauga.ca](mailto:official.plan@mississauga.ca)

Dear Mr. Philips:

**RE: DRAFT MISSISSAUGA OFFICIAL PLAN AMENDMENT  
OUR FILE 17109AE: 30-110 Courtneypark Dr E / 40-90 Annagem Blvd**

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MacNaughton Hermsen Britton and Clarkson Planning Limited ("MHBC") is currently retained by Mississauga Entertainment Holdings Inc., in relation to lands municipally located at 30-110 Courtneypark Drive East and 40-90 Annagem Boulevard, in Ward 5 of the City of Mississauga (the "Subject Lands").

This property is recognized as the Mississauga Entertainment Centrum ("MEC") that has been in operation for over 20 years and contains a Cineplex theatre, a multitude of restaurants, and a fitness centre that services regional populations, and the employees within the neighbouring industrial facilities and lands north of Provincial Highway 401. The combined area of the Subject Lands is approximately 10.7 hectares.

Since COVID, various vacancies have been brought to our attention, and further to this, the current and proposed Official Plan policies with no site specific recognition of the current uses on the Subject Lands, is making re-tenanting the various buildings a challenge as the designation is very restrictive with respect to what is permitted.

This letter is submitted in regards to the proposed Draft Mississauga Official Plan Amendment ("draft MOPA"). The proposed draft policies and schedules of the draft MOPA form the basis of our comments. It is important to note that the Mississauga Entertainment Centrum anticipates remaining in its current location for the long-term to the extent of the City's growth projections to 2051.

The following provides an overview of the subject land's current land use context, an overview of applicable and proposed policies for MEC, the impacts and outcomes of the proposed policies on the Subject Lands, and general recommendations regarding the draft proposed policies and schedules.

**SUBJECT LANDS: Current Context**

The Subject Lands are situated within a Provincially Significant Employment Zone ("PSEZ"). The Province's Growth Plan defines PSEZ's as follows: "Areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. Provincially



significant employment zones can consist of employment areas as well as mixed-use areas that contain a significant number of jobs.”

Within the recently approved Peel Region Official Plan (ROP), the Subject Lands are within the Urban System, Built Up Area and within a Strategic Growth Area (SGA) as a Primary Major Transit Station Area (MTSA), where development can meet or exceed the density target. The Subject Lands are also within the Region’s Employment Area. Hurontario Street is a Light Rail Transit (LRT) line and identified as a Regional Intensification Corridor that is described as a focal area for investment in region-wide services. The ROP defines the Regional Intensification Corridor as follows: “Regionally-significant, multi-functional, linear concentrations of urban development providing a range and mix of commercial, office, major institutional, residential, recreational and cultural services or facilities that supports higher order transit service and links urban growth centres together.” The Subject Lands are also within the Toronto Pearson International Airport Operating Area Boundary.

Under the current City of Mississauga Official Plan, the Subject Lands of Courtneypark Dr E are within a Gateway Corporate Centre and designated as ‘Office’. The ‘Office’ designation permits Major Office, Secondary Office and Accessory Uses. Accessory commercial uses will generally be limited to a maximum of 30% of the total Gross Floor Area (s.15.3.3.1.2). Free-standing accessory uses will not be permitted. All accessory uses must be contained within the same building as the principle use. Post-secondary educational facilities, overnight accommodation and conference centres may also be permitted in an ‘Office’ designation. Section 15.3.2.2 states that existing uses are permitted and that limited expansions are permitted on a site-specific basis subject to urban design considerations.

The Annagem Blvd property is designated both Office and Business Employment. Permitted uses within the Business Employment provide a greater array of uses than the Office designation permits and may be considered predominantly commercial type uses combined with lighter industrial uses. Section 10.2.13 lists entertainment, recreation and sports facilities and restaurants as permitted uses within the Business Employment designation.

## **PROPOSED MOPA**

The proposed draft MOPA, maintains the same designation and land use policies as the current, in effect Official Plan. The Subject Lands are within the Gateway Corporate Centre and designated as ‘Office’ (Schedule 7b). What is new, is that the Subject Lands are now within the delineated Courtney Park Protected Major Transit Station Area (PMTSA) (Schedule 8h) along the LRT line with a minimum building height requirement of 3 storeys.

Section 10.2.8: Office lists the permitted uses as follows: major office; secondary office; and accessory uses. Accessory uses are to be on the same lot and subordinate to the permitted use.

Section 15.12: Gateway Corporate Centre includes land use and urban design policies for the Courtney Park PMTSA. In addition to the Office designation permitted use policies, manufacturing, overnight accommodation and research and development will also be permitted.

Section 15.12.2.2 states that, “Existing buildings that do not meet the built form policies will be encouraged to redevelop in keeping with the vision for the Hurontario Street corridor.” This is similar to the current Official Plan section 15.3.2.3 that states that, “Existing buildings that do not meet the built form policies including single storey financial institutions and freestanding restaurants... will be encouraged to redevelop in keeping with the vision for the Hurontario Street Intensification Corridor.”

Chapter 16 Special Sites identifies the Subject Lands as Site 24 (Gateway Corporate Employment Area). The policies repeat the special site policies of the current, in effect Official Plan policies, such as accessory commercial uses being limited to a maximum of 30% of the total GFA and that freestanding accessory commercial uses are not permitted and that such uses must be contained within the same building as a principal use.

Regarding the Courtney Park PMTSA, Chapter 11, Transit Communities, section 11.3.4 indicates that, "Development will contribute towards the creation of transit-supportive communities by: d. recognizing that some Protected Major Transit Station Areas will have limited opportunities to accommodate a mix of uses and varying building forms due to the existing and planned context." The Courtney Park PMTSA is identified as the HLRT-17 station area and has a minimum density target of 160 ppj/ha with a 1.0 Floor Space Index ("FSI").

Regarding the Pearson International Airport, the Subject Lands are located within the 30 and 35 NEF contour lines of the airport runways. The MOPA identifies this in Figure 4.17: 1996 NEP/2000 NEF Composite Noise Contours.

## **MOPA POLICY ASSESSMENT**

### **Employment Areas**

While the Planning Act's definition of 'area of employment' has not yet been proclaimed, there are significant sections of the proposed draft MOPA that may not be in conformity with legislation should it receive Royal Assent. Specifically, the Office designation of the Courtneypark and partial Office designation of the Annagem lands will be deemed to be a commercial use rather than an employment use. This could result in office uses becoming non-conforming uses under legislation.

The new legislation related to areas of employment will recognize existing businesses within Employment Areas so long as they exist as of the date that legislation receives Royal Assent. As the Subject Lands do not contain significant Office uses at this time, the designation of the Subject Lands as mainly Office use should be reconsidered.

Chapter 15 Employment Areas describes the general permitted uses as follows: "Employment Areas are designated for clusters of business and economic activities including manufacturing, research and development, offices, warehousing, goods movement, film studios, and associated commercial, retail and ancillary facilities." Yet the definition of Complete Communities indicates that areas within cities should offer and support opportunities for people to conveniently access to necessities for daily living and that they may take different shapes and forms appropriate to their contexts. In the case of the Employment Area surrounding the Subject Lands, the current and future food services provided on site offer convenient access to employees within this job-based community.

### **PMTSAs**

The Subject Lands are located within the Courtney Park PMTSA. While the MOPA continues to designate the Subject Lands as Office and a small area as Business Employment, the focus on one major type of use contradicts the MTSA objectives of Chapter 11. Section 11.2.5 states that, "Development in the Major Transit Station Areas will support the following objectives: b. encourage a balanced mix of transit-supportive uses such as residential, retail, offices, open space, and public uses that supports the needs of employees and residents in a walkable environment." At this time, the focussed office uses permitted within the Office designation do not encourage a balanced mix of transit-supportive uses.

Another vision for MTSA's, is stated in section 11.2.6, that should the City initiate a planning study for a PMTSA, it will set out policies that support an appropriate mix of land uses and amenities that "foster

vibrant, transit-supportive neighbourhoods.” It does not state that an objective is to limit PMTSA to one or handful of main land uses, such as office only uses.

In regards to change, section 11.3.4 states that, “Development will contribute towards the creation of transit-supportive communities by: c. including a range of employment uses to achieve a well balanced mix of office and retail uses,” but then creates an opinion that, “d. recognizing that some Protected Major Transit Station Areas will have limited opportunities to accommodate a mix of uses and varying building forms due to the existing and planned context.” In the case of the Subject Lands, there is a greater opportunity to accommodate a mix of uses and built forms within the Office designation, should the land use designation be amended to recognize existing entertainment and business uses, and other permitted uses in the Business Employment designation.

### **Office Designation/Use**

The proposed MOPA indicates in section 9.2 that the promotion of office development within the Urban Growth Centre (e.g. downtown) is of particular importance to the City in order to support public transit and to create a ‘lively mixed use live/work area’. This is followed by policy 9.2.1 where major office development is encouraged to develop in the UGC, but that secondary office development is encouraged within MTSA’s under 9.2.2. If the Subject Lands are to be ‘secondary office development’ areas, the Office use is not of primary importance, as the following policy 9.2.3 indicates that retail is encouraged in the ground floor areas of office buildings. This then raises the question as to why the PMTSA “Courtney Park Gateway Centre” is not designated as a mixed-use site recognizing existing uses and adding commercial uses that support live/work/play to achieve a complete community within an employment area.

### **Retail Designation/Use**

In the introductory paragraphs of Chapter 9: Supporting Jobs and Business, the proposed MOPA indicates that the city’s focus for major office, retail and institutional employment growth will be in the Strategic Growth Areas, supported by existing or planned higher order transit service. The Subject Lands are within a Strategic Growth Area – the PMTSA, supported by the LRT. It should be noted, that in Figure 9.1 there is an image of the “Spectrum Square” office building in the Airport Corporate Centre Employment Area, with a by-line that indicates that this office building is located at a bus rapid station and supported by neighbouring retail uses. The MOPA makes a correlation between office and retail as being important for the achievement of ‘work/play’ in an employment area.

The MOPA also reinforces that retail is normally combined with other uses. The recent trend is to physically combine such uses within one building, rather than mixing uses within a land use designation. Section 9.4 Retail, states that, “Retail is often combined with other uses such as personal service establishments, offices, financial institutions, restaurants and overnight accommodations.” Note that office and overnight accommodations are permitted uses in the Office designation of the Subject Lands, but that retail is technically deemed to be an accessory use to the primary Office use. The MOPA also indicates that within Employment Areas, ‘ancillary retail’ is encouraged to provide services to local business/employees, but not in a ‘new’ freestanding retail use building.

It is also important to note that section 9.4 states that within Employment Areas, “existing retail areas will be recognized by this plan”, but that their expansion will not be permitted, and new major retail areas will not be permitted. The policy does not state that new retail uses within existing buildings are not permitted, but that retail areas are encouraged to redevelop to non-retail employment uses. It should be noted that the Subject Lands should be recognized as an ‘existing retail area’ but were redesignated as Office use through a housekeeping amendment.

And finally, section 9.4.2 states that retail uses outside of Urban Growth Centres, Major Nodes and Community Nodes are directed to MTSAs.

### **Business Employment and Industrial Designations/Uses**

The majority of lands designated as PSEZ by the Province, and Employment Area in the Region Official Plan, are designated as Business Employment within the MOPA, Schedule 7: Land Use Designations. Only a small percentage of Employment Area lands in the MOPA are designated as Industrial. In context of the *Planning Act's* potential definition of Employment Area, this indicates that the Subject Lands may not be deemed to be within a true Employment Area as there are limited Industrial uses identified as permitted uses.

While The Gateway Corporate Centre is an Employment Area, within which the Subject Lands are located, section 15.4.8 Industrial of the MOPA, indicates that the Industrial designation is not permitted within this Employment Area. This would be counter to the potential amendment of the Planning Act's definition of Employment Area that would only permit Industrial uses within an Employment Area.

Under section 10.2.14 Industrial, the permitted uses listed within this Industrial designation, compared to the permitted use list of section 10.2.13 Business Employment designation are fairly similar, with the main difference being that Major Power Generation and outdoor storage is permitted in the Industrial area. Secondary office uses are permitted in both, as are entertainment/recreation/sports facilities and restaurants.

### **Expansion of Existing Businesses**

While the MOPA intends to 'support jobs and businesses', this appears directed to the attraction of new jobs and businesses, rather than existing ones. Section 9.1.5 indicates that the City will only facilitate the operation, and where appropriate, the expansion of existing businesses if it is permitted by the MOPA policies. Yet the proposed Office designation policies do not permit existing businesses to continue or expand, as some form of incentive to established and existing business to relocate at their own expense to another location, with MOPA designations that would permit such uses.

### **Built Form**

In the Employment section, Figure 3.2, the chart indicates in the column titled, 'overview of planned built form', the employment area will generally have a 'mixture of low-rise and mid-rise buildings with some tall buildings where existing offices are concentrated.' MOPA, Schedule 8b, PMTSAs, indicates that there is a 3-storey minimum building height, which should be amended to 1 storey to recognize existing built forms throughout the Employment Area and industrial use buildings. This 3-storey minimum affects the opportunity for an existing business to expand a building footprint wherein industrial buildings also tend to be one storey.

## **POLICY RECOMMENDATIONS**

To support the existing operation of the Mississauga Entertainment Centrum, and its continuation, the following policy amendments are provided for consideration:

### **1. Office Designation: Existing Uses**

A policy should be added to the Office designation section that permits existing uses to continue their operations and to expand the built form as needed.

Add a new section:

- 10.2.8.4 The following apply to uses and buildings that are legally existing as of the date of adoption of this Plan:
- 10.2.8.4.1 Any existing use will continue to be permitted, including the continuation of such use by new tenants/lessees, within existing buildings.
- 10.2.8.4.2 Any renovation, addition or expansion of existing buildings shall be permitted.

## **2. Section 15: Gateway Corporate Centre**

The following policy should be added to section 15.12.2 Land Use to recognize the continuation of existing uses on the Subject Lands for the long-term:

- 15.12.3 Site Specific Land Use
- 15.12.3.1 In addition to the Office designation policies of this Plan, and the Site 24 (Gateway Corporate Centre Employment Area) policies, the following uses will be permitted, as freestanding buildings and uses, on lands designated Office and Gateway Corporate Centre Employment Area at 30-110 Courtneypark Dr E and 40-90 Annagem Blvd:
  - a. entertainment, recreation and sports facilities;
  - b. restaurant;
  - c. Commercial and retail.
- 15.12.3.2 Notwithstanding policy 15.12.2.2, existing and new buildings at 30-110 Courtneypark Dr E and 40-90 Annagem Blvd, designated as Office, will be allowed to expand and redevelop in keeping with permitted uses.

## **Conclusion**

In the context of proposed legislative changes of the Planning Act that may define Area of Employment as being strictly limited to industrial uses (e.g. manufacturing/warehousing) and indicating that office use is considered to be a commercial use, the lands within the Gateway Corporate Centre should be redesignated to a commercial-based designation. We also request a site-specific regulation be added to the Subject Lands recognizing the existing commercial function. This would support recognition of existing uses of the Subject Lands that are commercial uses and should be recognized through the draft MOPA as such. The Mississauga Entertainment Centrum is remaining in its location and has no plans to relocate to a new location as it currently serves local industrial business employees on a daily basis (having done so since its inception).

We appreciate the opportunity to provide our comments regarding the draft Mississauga Official Plan Amendment.

Thank you.



Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'Oz Kemal', written over the printed name.

Oz Kemal, BES, RPP, MCIP  
Partner

cc. *Mississauga Entertainment Holdings Inc. (c/o PenEquity Inc.)*



December 5, 2024

**By E-Mail to [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)**

Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga ON L5B 3C1

**Attention: Angie Melo, Legislative Coordinator ([angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca)); Ben Phillips, Manager, Official Plan and Planning Data Initiatives ([ben.phillips@mississauga.ca](mailto:ben.phillips@mississauga.ca))**

Dear Planning and Development Committee Members:

**Re: December 9, 2024 PDC Meeting (6:00PM) Item 6.3 Public Meeting (All Wards) Proposed Mississauga Official Plan 2051 – Status Update**

MPCT DIF 70 Park Street East LP (“Dream”) is the agent for 70 Park Street East Inc. the owners of 70 Park Street East, 23, 25, 29 and 31 Helene Street North, and 53 Queen Street East (“70 Park”). 70 Park is the subject of an active development application (OZ/OPA 23-3 W1) and OLT appeal for which Council endorsed a settlement offer at its July 31, 2024 meeting (Council Resolution 0157-2024). This settlement offer contemplates a new 33 storey mixed use building on the northern portion of 70 Park and retaining the existing 27-storey rental residential building on the southern portion of the site. The entirety of 70 Park is currently zoned as RA5-27 which permits a maximum height of 28 storeys.

We have reviewed the Public Meeting Report and appendices with respect to the Proposed Mississauga Official Plan 2051 – Status Update, particularly the staff comments therein pertaining to enabling more housing in Protected Major Transit Station Areas (MTSAs). We note that Appendix 1 Proposed MTSA Height Adjustments (Schedule 8) contains proposed changes reflecting existing buildings, approved development and MZOs, and also an overlay for active development applications. Further on Schedule 8n (Huronario LRT – Mineola, Port Credit), we note that the southern portion of 70 Park features a proposed revised height maximum of 27 storeys, and the northern portion is indicated as an active development application.

We would like to request that the entirety of 70 Park be shown as an “active development application” to reflect the full site area of application OZ/OPA 23-3 W1. This would allow for a future update to Schedule 8n with maximum heights that are aligned with those contained in the final Official Plan Amendment and Zoning By-Law Amendment for 70 Park following the issuance of the final OLT order.

We respectfully request that Council and staff consider our above comments as they proceed towards finalizing the proposed Mississauga Official Plan 2051.

Also please accept this letter as our request for notice of all decisions and passage of by-laws in relation to the above.

Yours truly,



Paul Cope  
Development Lead  
[PCope@dream.ca](mailto:PCope@dream.ca)  
Dream Asset Management

cc: Alex Heath, Dream Asset Management  
Rodney Gill, Goodmans LLP  
David Sajecki, Sajecki Planning

Mayor Carolyn Parrish and Members of City Council  
c/o Angie Melo, Legislative Coordinator  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

(Via Email to: [angie.melo@mississauga.ca](mailto:angie.melo@mississauga.ca))

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Phone: 416 596 1930  
[www.arcadis.com](http://www.arcadis.com)

Date: December 5, 2024

Arcadis File No.: 124247

Subject: **Official Plan Review – Proposed Mississauga Official Plan 2051  
Comments for 1475 Dundas Street East, Mississauga**

Dear Mayor Parrish and Members of City Council,

Arcadis Professional Services (Canada) Inc. ("Arcadis") are the planning consultants to Canadian Urban Limited ("Owner"), owners of the property municipally known as 1475 Dundas Street East in Mississauga ("subject site"). The subject site is currently a 2.24 hectare commercial plaza, which fronts on the north side of Dundas Street East and is located approximately 150 metres east of Dixie Road (Figure 1). The subject site is also approximately 500 metres from the Dixie GO Train Station, and is within the Dixie GO Major Transit Station Area. The Dundas Bus Rapid Transit line is expected to operate along Dundas Street East.



Figure 1: Site Location Map – 1475 Dundas Street East, Mississauga

Mayor Parrish and Members of City Council  
City of Mississauga  
December 5, 2024

We request the City's land use planning staff to include in the draft Mississauga Official Plan 2051 ("MOP 2051") a policy in Section 13.3.5 Dixie-Dundas of the draft MOP 2051: To allow the boundary of the Dixie-Dundas Community Node to expand and include lands within the Dixie-Dundas and Applewood Special Policy Areas once appropriate flood mitigation is completed and proposed policy changes have been approved by the Province. This request to change the draft MOP 2051 is consistent with the Provincial Planning Statement, 2024, and the City's Dundas Connects Master Plan.

In the current Official Plan (office consolidation, August 7, 2024), as shown in Schedule 10 – Land Use Designations, the subject site has a land use designation of Mixed Use which permits a wide range of non-residential and residential uses, but the subject site is also subject to the Dixie Employment Area Official Plan policies in Section 17.4 and Special Site Policies 17.4.4.1.1, which identify the site in a Special Policy Area ("SPA"). The SPA is called the Dixie SPA as identified in the Dixie Employment Area Character Area section of the Official Plan. The policies associated with the SPA limit redevelopment within the Little Etobicoke Creek floodplain pending the completion of City-initiated flood studies and the construction of required mitigation measures to remove the floodplain and SPA policies from the subject site and affected lands.

The subject site is also near the Dixie and Dundas corridors and is identified in the Official Plan as being within the Dixie-Dundas Community Node. Community Nodes are Intensification Areas that are intended to serve their surrounding neighbourhoods with a mix of uses, services and community facilities. The boundary of the Dixie-Dundas Community Node was determined through a Local Area Plan Review which was the Dundas Connects Master Plan. This ultimately led to the Dundas Corridor Policy Implementation Project – Official Plan Amendment (OPA 141 and OPA 142) which defined the boundary of the Dixie-Dundas Community Node in July 2022.

OPA 141 stated the Dixie-Dundas Community Node will include diverse employment, commercial, and residential uses with a range of housing options, forms and tenure. The staff report to the Planning and Development Committee, dated June 10, 2022, noted that the subject site was not included within the boundary of the community node due to requests from the Toronto and Region Conservation Authority and the Special Policy Area. However, it also stated that "it is the intent that the Community Node boundary would eventually include lands within these two Special Policies Areas once appropriate flood mitigation is completed and proposed policy changes are approved by the Province." No land use changes were proposed to the lands in the SPA in OPA 141 so the subject site's Mixed Use designation remained.

In the draft MOP 2051, the defined Dixie-Dundas Community Node was removed from the Dixie Employment Area and all remaining Mixed Use areas, including the subject site, in the Dixie Employment Area was given a new designation of Employment Commercial, which essentially is the Mixed Use designation with no residential uses – similar to the current Official Plan permissions for the subject site. While we understand the reasons for not including the subject site in the Dixie-Dundas Community Node in the current draft MOP 2051, the draft policies in Section 13.3.5 Dixie-Dundas should also include policies to allow the boundary of the Dixie-Dundas Community Node to expand and include lands within the Dixie-Dundas and Applewood Special Policy Areas once appropriate flood mitigation is completed and proposed policy changes have been approved by the Province.

The City-initiated Dixie-Dundas Flood Mitigation Study is progressing and completed a Schedule C Class Environmental Assessment Study in June 2024. This resulted in a Final Environmental Study Report that describes the Preferred Design which improves the floodplain and removes the existing two SPAs (Applewood and Dixie-Dundas), opening all of the subject site and surrounding lands for development. Once the floodplain and SPA are removed from the subject site, we would request that the subject site to be removed from the Dixie Employment Area and included in the Dixie-Dundas Community Node as designated Mixed Use with residential uses permitted. This would be consistent with the Dundas Connects Master Plan which recommended that: "Lands that are currently



Mayor Parrish and Members of City Council  
 City of Mississauga  
 December 5, 2024

designated mixed use along the (Dundas) corridor and near major transit stations should also allow for residential, major office and institutional uses to support the achievement of intensification targets.”

The Provincial Planning Statement, 2024 (“PPS”) supports intensification around Major Transit Station Areas (“MTSAs”), with a minimum density target of 160 residents and jobs combined per hectare along bus rapid transit lines. Similar to many other owners of older retail strip plazas, particularly within a MTSA and well served by higher order transit, the Owner is planning to intensify the subject site with a future high density mixed-use redevelopment including diverse non-residential and residential uses. This vision for the subject site is consistent with the PPS direction to promote intensification within MTSAs, and to focus development in strategic growth areas with opportunities for infill and redevelopment, such as underutilized shopping malls and plazas. The Owner is in the process of preparing a concept for a high-density mixed-use residential and commercial development and will request a pre-consultation meeting with the City of Mississauga at the appropriate time.

Please be advised that Arcadis and the Owner welcome any further discussion with City staff on the requested changes, and vision for the subject site. We would like to thank Mayor Parrish, City Councillors, the City’s Planning and Development Committee, and the City’s Planning staff for your considerations of our comments and requested changes. We thank you for the opportunity to comment on the new draft MOP 2051 and request notification of any future meetings or decisions relating to the City of Mississauga Official Plan Review.

If you have any questions or require anything further, please contact the undersigned.

Sincerely,

**Arcadis Professional Services (Canada) Inc.**




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Simon Yee MCIP RPP  
 Associate – Manager, Planning  
[simon.yee@arcadis.com](mailto:simon.yee@arcadis.com)

Cc:

Mayor Carolyn Parrish (mayor@mississauga.ca)  
 Ward 1 – Councillor Stephen Dasko (stephen.dasko@mississauga.ca)  
 Ward 3 – Councillor Chris Fonseca (chris.fonseca@mississauga.ca)  
 Andrew Whittemore, Commissioner of Planning and Building (andrew.whittemore@mississauga.ca)  
 Mississauga City Council (application.info@mississauga.ca)  
 Sorab Gill, Canadian Urban Limited



Planning and Building Department  
Development and Design Division  
300 City Centre Drive  
Mississauga, ON L5B 3C1

Friday, December 6th, 2024  
DPS File: 2375

**RE:**

**66 & 64 Thomas Street, 95 Joymar Drive, & 65 Tannery Street  
City of Mississauga  
Regional Municipality of Peel  
Planning and Development Committee, December 9, 2024  
Corporate Report: CD.02-MIS  
Comment regarding Draft Mississauga Official Plan 2051**

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We are writing on behalf of our client, De Zen Realty Limited, the property owner of 66 & 64 Thomas Street, 95 Joymar Drive, & 65 Tannery Street, City of Mississauga herein referred to as the “Subject Property”.

We are providing this letter to the City of Mississauga regarding the Draft Mississauga Official Plan 2051 released on March 18, 2024 (“Draft OP”). Currently, within the in-effect Mississauga Official Plan, the Subject Property is designated as “Residential Medium Density” and is within the “Special Site 2” area of the “Streetsville Community Node”. Based on a review of the proposed new Draft OP, the Subject Property is proposed to be designated as “Residential Low Rise II” and is within the “Special Site 49” area of the “Streetsville Community Node”. Considering this to be the case, the current in-effect Official Plan and the proposed new Draft OP are largely the same as it relates to the Subject Property. Specifically, the “Special Site 49” policies within the new Draft OP are largely the same as the “Special Site 2” policies of the currently in-effect Official Plan, with the exception of a new policy proposed within the “Special Site 49” section which sets out a maximum Floor Space Index (“FSI”) of 1.3x the area of the lot that is applicable to the Subject Property.

Both the in-effect and proposed new Official Plans are restrictive in terms of development on the Subject Property and do not serve to implement Provincial and Regional policies regarding intensification, compact form, and transit-oriented development. The Subject Property is in very close proximity to the Streetsville GO Station and the area surrounding the Streetsville GO station has been identified as a “Planned Major Transit Station Area” as per the Region of Peel Official Plan, 2022.

Recognizing that the Subject Property represents an opportunity for intensification in close proximity to and optimizing the use of higher-order transit, our client, through DPS, has already engaged in pre-consultation (DARC) with City Staff where Staff was advised about a proposed development that would facilitate high-density intensification of the Subject Property. A higher-density built-form on the Subject Property will result in the efficient use of currently under-utilized lands. On that basis, it would be more appropriate for the Subject Property to be designated as "Residential High-Rise" and not to be subject to the limiting policies of "Special Site 49" within the proposed Draft OP in order to better implement the policies of the Provincial Planning Statement and Region of Peel Official Plan. Redevelopment in a higher-density built-form on the Subject Property will contribute towards a more complete community for residents of all ages; will contribute to increasing the supply of and will provide for a larger variety of housing options within the Streetsville area and City of Mississauga; will facilitate development that is compatible with the surrounding land uses and would provide for a gentle increase in density relative to the adjacent existing built form; will contribute to the existing diversity of the housing stock in the Streetsville Strategic Growth Area; will contribute to achieving the overall minimum density target of the future MTSA; will contribute to achieving an overall attractive and desirable environment within Mississauga and the Streetsville Planned MTSA; will contribute to enhancing the public realm as well as the overall vibrancy of the streetscape on Joymar Drive, Thomas Street, and Tannery Street; will be supported by existing higher-order transit in proximity and would facilitate direct pedestrian connectivity to Streetsville GO Station; and would contribute to the promotion of active transportation.

We would respectfully request that the Planning Staff reconsider the currently proposed designations applicable to the Subject Property within the new Draft OP to better align with the policy direction of the Province and Region to facilitate intensification and compact form in close proximity to higher-order transit, as detailed within this letter.

Should you have any questions or concerns please do not hesitate to contact the undersigned.

Sincerely,

**DESIGN PLAN SERVICES INC.**



**T.J. Cieciura, MSc MCIP RPP**  
PRESIDENT

Encl.

TJC/di

Cc. Mark Palmieri, DeZen Realty Limited

Planning and Building Department  
Development and Design Division  
300 City Centre Drive  
Mississauga, ON L5B 3C1



Friday December 6th, 2024  
DPS File: 22168

**RE:**

**120, 128, 142, 148, 154, 158 Queen Street South & 169 Crumbie Street  
City of Mississauga  
Regional Municipality of Peel  
Planning and Development Committee, December 9, 2024  
Corporate Report: CD.02-MIS  
Comment regarding Draft Mississauga Official Plan 2051**

We are writing on behalf of our client, De Zen Realty Limited, the property owner of 120, 128, 142, 148, 154, 158 Queen Street South & 169 Crumbie Street, City of Mississauga herein referred to as the “Subject Land”.

Our team at Design Plan Services Inc. submitted a comment letter dated June 28, 2024, to the City of Mississauga regarding the Draft Mississauga Official Plan 2051 released on March 18, 2024 (“Draft OP”). We requested city staff to provide clarification on the proposed policy ‘14.1.2.2(a)’ and to confirm whether this policy would be applicable to the Subject Land. For reference, draft Policy 14.1.2.2(a) is outlined below:

**14.1.2.2 Within Neighbourhood Character Areas, *development* of Mixed Use sites that are over 1 ha in size will:**

**a. maintain the same amount of commercial floor space;**

We have reviewed the latest Corporate Report: CD.02-MIS (“Report”), dated November 27, 2024, which will be brought in front of the Planning and Development Committee (“PDC”) on December 9, 2024. In Appendix 4 of the Report, staff provided general responses to public comments received since the March 18, 2024 PDC Meeting. However, we found that our previous question regarding draft Policy 14.1.2.2(a) has not been fully answered with the response provided. See staff response below extracted from Appendix 4 of the Report:

<b>Retail Preservation</b>	1. Redevelopment having to replace commercial floor space on a 1:1 ratio is too restrictive and does not consider market trends	1. Policy will be modified to address this. Replacement ratio of lost commercial space will be determined based on the size of the site/redevelopment. Non-residential employment uses are necessary to meet the density target of people and jobs and to ensure complete communities
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It remains our interpretation that draft Policy 14.1.2.2(a) pertaining to development of Mixed Use Sites within Neighbourhood Character areas, does not apply to the Subject Land, despite the fact that the Subject Land is located within an area designated as 'Mixed Use' in Schedule 7 – Land Use Designation.

According to the latest draft OP, Policy 13.3.3.5.5 applies to redevelopment within 'Community Nodes'. Therefore, this policy would be applicable to the Subject Land, which is located within the Streetsville Community Node Character Area. However, as requested in our previous letter, we kindly ask staff to provide confirmation of this interpretation.

We appreciate the general response provided by staff and recognize the importance of non-residential employment uses in supporting the development of complete communities. However, we maintain that the replacement of commercial space should not be based on the size of the site or redevelopment, but rather on whether the planned function of the Mixed Use designation is maintained. We continue to believe that the draft policy 13.3.3.5.5 is more appropriate for redevelopment of areas designated as Mixed Use across the city, and recommend that similar wording as draft policy 13.3.3.5.5 should be applied to encourage efficient use of lands within settlement areas and promote redevelopment in a compact and sustainable form. See draft Policy 13.3.3.5.5 below:

*13.3.3.5.5 Redevelopment* that results in a loss of retail and service commercial floor space will not be permitted unless it can be demonstrated that the non-residential planned function of the Mixed Use designation will be maintained.

We would appreciate if Planning Department Staff could confirm our interpretation of the applicable policies above, and, although it is not specifically applicable to the subject land, we would suggest that the policy requiring that redevelopment within Neighbourhood Character Areas maintain the same amount of commercial floor space be amended to be similar to the "maintain the planned function" policies Citywide.

Should you have any questions or concerns please do not hesitate to contact the undersigned.

Sincerely,

**DESIGN PLAN SERVICES INC.**



**T.J. Cieciora, MSc MCIP RPP**  
PRESIDENT

Encl.



TJC/amp

Cc. Mark Palmieri, DeZen Realty Limited

Planning and Building Department  
Development and Design Division  
300 City Centre Drive  
Mississauga, ON L5B 3C1

Friday June 28th, 2024  
DPS File: 22168



**RE:**

**120, 128, 142, 148, 154, 158 Queen Street South & 169 Crumbie Street  
City of Mississauga  
Regional Municipality of Peel  
Comment regarding Draft Mississauga Official Plan 2051**

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We are writing on behalf of our client, De Zen Realty Limited, the property owner of 120, 128, 142, 148, 154, 158 Queen Street South & 169 Crumbie Street, City of Mississauga herein referred to as the "Subject Land".

Our team at Design Plan Services Inc. has reviewed the Draft Mississauga Official Plan 2051 released on March 18, 2024 and in particular how it relates to our client's property which is located in the City of Mississauga.

Based on our review of the plan policies, it is our interpretation that Policy 14.1.2.2a pertaining to development of Mixed Use Sites does not apply to the Subject Land outlined above, despite the fact that the Subject Land is located within an area that is Designated as 'Mixed Use' in Schedule 7 – Land Use Designation. Policy 14.1.2.2a is outlined below:

**14.1.2.2 Within Neighbourhood Character Areas, *development of Mixed Use sites that are over 1 ha in size will:***

- a. maintain the same amount of commercial floor space;**

We believe that the Subject Land is not located within a 'Neighbourhood Character Area' (NHD), and therefore the policies within Chapter 14 would not be applicable to the Subject Land. We note that Map 14-16 of the Draft Official Plan continues to illustrate the Streetsville Neighbourhood Character Area, however the Subject Land has been specifically delineated as excluded from within the Neighbourhood Character Area. Instead, the Subject Land is within an area identified as the "Streetsville Community Node Character Area" on Map 13-15 of the Draft Official Plan. Therefore, it is our opinion that the Subject Land would be subject to policies under "Chapter 13 Nodes". In particular, policy 13.3.3.5.5 is applicable, which pertains to redevelopment of sites designated Mixed Use within Mall-based Community Nodes, as set out below:

**13.3.3.5.5 *Redevelopment*** that results in a loss of retail and service commercial floor space will not be permitted unless it can be demonstrated that the non-residential planned function of the Mixed Use designation will be maintained.

We believe that this policy, which provides that redevelopment of areas designated as mixed use should maintain their non-residential function, is more appropriate than requiring redevelopments to maintain the 'same amount' of existing commercial floor area. Similar wording as policy 13.3.3.5.5 should be applied for mixed-use sites citywide to encourage efficient use of lands within settlement areas and promote redevelopment in a compact and sustainable form. We believe that, with the changing nature of work, retail land uses, the way people shop and engage in commercial activities, the "planned function" principal is more appropriate than the "maintain the same amount" principal.

We would appreciate if Planning Department Staff could confirm our interpretation of the applicable policies above, and, although it is not specifically applicable to the subject land, we would suggest that the policy requiring that redevelopment within Neighbourhood Character Areas maintain the same amount of commercial floor space be amended to be similar to the "maintain the planned function" policies Citywide.

Should you have any questions or concerns please do not hesitate to contact the undersigned.

Sincerely,

**DESIGN PLAN SERVICES INC.**



T.J. Cieciora, MSc MCIP RPP  
PRESIDENT

Encl.

TJC/amp

Cc. Mark Palmieri, DeZen Realty Limited

December 6, 2024

City Clerk's Office  
300 City Centre Drive  
Mississauga, ON L5B 3C1

**Re: Planning and development Committee, December 9, 2024  
6.3 Public Meeting (All Wards)  
Proposed Mississauga Official Plan 2051 – Status Update**

To Whom It May Concern,

My name is Christine Fang-Denissov, a planner and partner Urban Strategies Inc. ("USI", "I" or "we"). USI has been retained by SmartCentres to advance the conversion requests for three of their sites in the City of Mississauga (3155 Argentia Road, 1100 Burnhamthorpe Road, and 780 Burnhamthorpe Road). I am writing on behalf of SmartCentres, regarding the draft Schedule 1 – City Structure Map with regard to the following sites located in the City of Mississauga:

- **Site 1:** 3155 Argentia Road (SmartCentres Meadowvale)
- **Site 2:** 1100 Burnhamthorpe Road

City Staff's proposed special site policies for 1100 Burnhamthorpe and SmartCentres Meadowvale proposed the removal of both sites in their entirety from the Employment Area structure and conversion to Community Area. The draft City Structure schedule released as part of agenda item 6.3 of the Planning and Development Committee meeting on December 9, 2024, does not show full conversion of the lands at SmartCentres Meadowvale and 1100 Burnhamthorpe and only shows a partial conversion of the lands from the Employment Area structure to Community Area. The rest of the lands remain within the Meadowvale Employment Area and the Mavis Erindale Employment Area (see Figures 1 and 2 at the end of this memo).

As such, we kindly ask that the City's Official Plan Review team revise draft Schedule 1 – City Structure to align with the proposed policies in the Information Report dated August 28, 2024, (see Figures 3 and 4 at the end of this report) and that states the following for the Meadowvale special site policies.

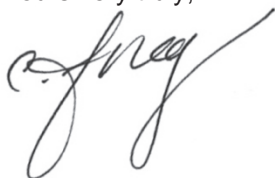
1. *Remove site from Meadowvale Corporate Centre EA and add to Meadowvale NHD*
  - a. *Revise Schedule 1 City Structure to reflect proposed policy changes*

The following is stated in the proposed special site policies for 1100 Burnhamthorpe:

1. *Remove site from Employment Area and add to Creditview Neighbourhood*
  - a. *Revise Schedules 1 City Structure and Schedule 7 Land Use to reflect proposed policy changes*

Thank you for your consideration.

Yours very truly,



Christine Fang-Denissov  
Partner

URBAN STRATEGIES INC.

c.c.      Allan Scully, SmartCentres  
Victoria McCrum, SmartCentres  
Luisa Galli, City of Mississauga  
Christian Binette, City of Mississauga  
Councillor Horneck, Ward 6  
Councillor Reid, Ward 9  
Councillor McFadden, Ward 10



Figure 1: Meadowvale Site Boundary Overlayed on Schedule 1 –City Structure

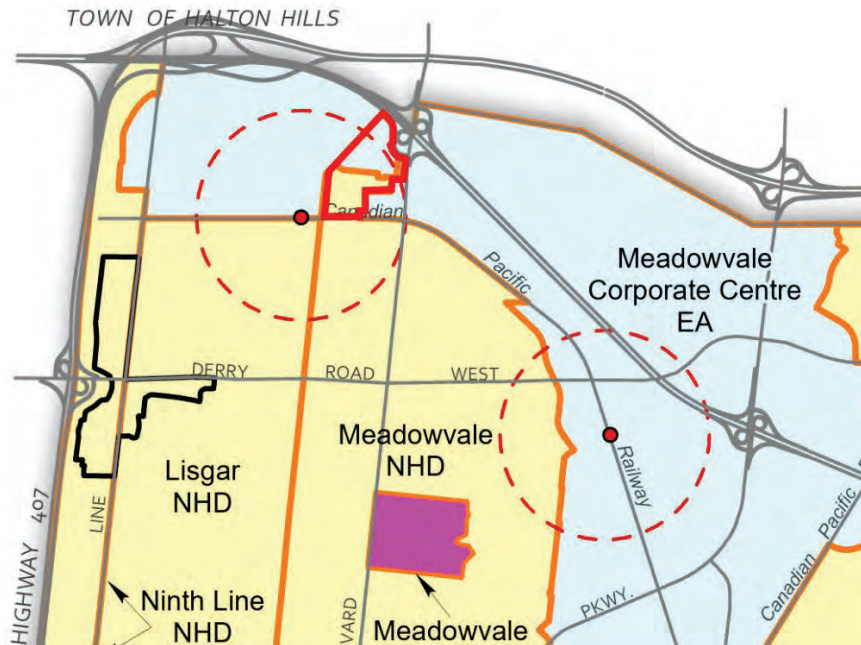


Figure 2: 1100 Burnhamthorpe Site Boundary Overlayed on Schedule 1 – City Structure

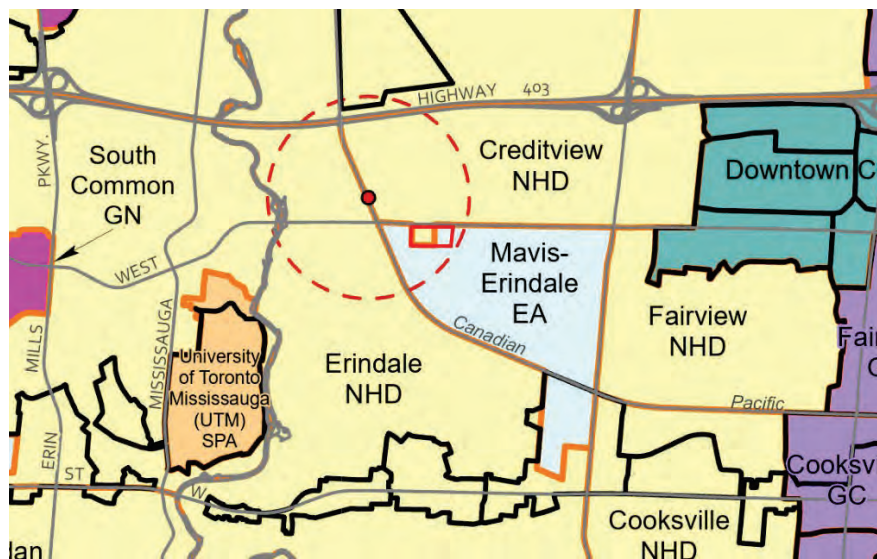


Figure 3: Revised Schedule 1 – City Structure for SmartCentres Meadowvale

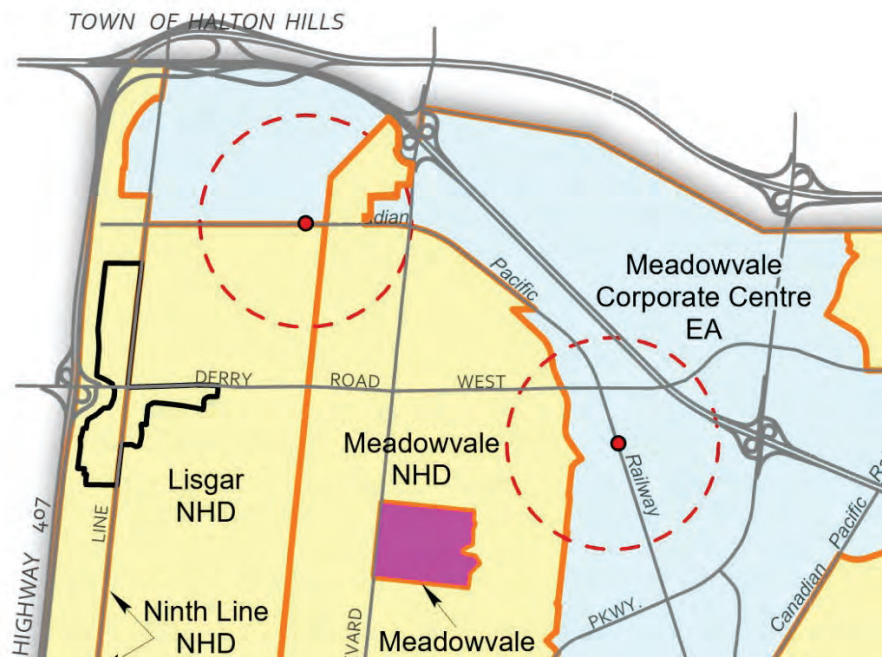
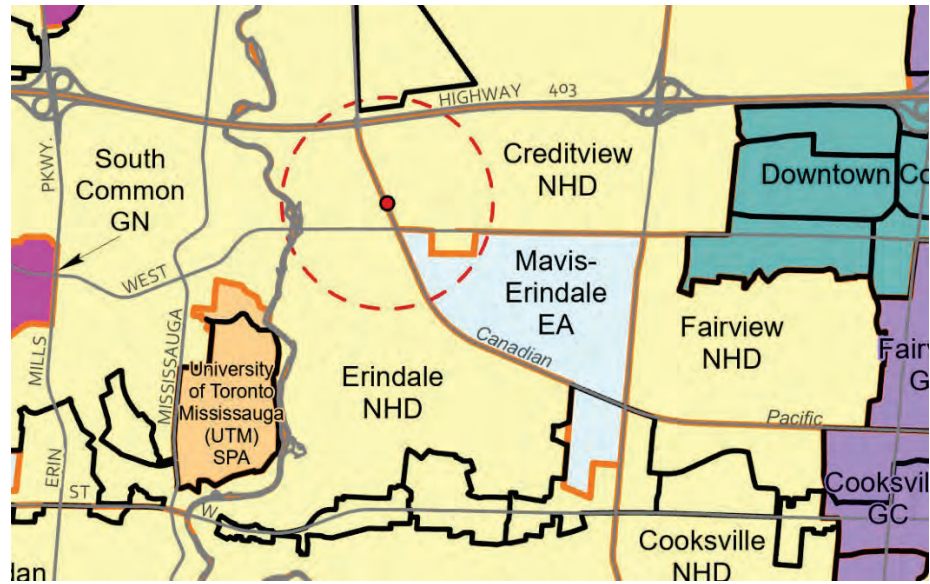


Figure 4: Revised Schedule 1 – City Structure for 1100 Burnhamthorpe



Joe Amato

December 9<sup>th</sup>, 2024

[REDACTED]

Mississauga, L5M 0R5

Attention to: Mayor Parrish & Council and Planning and Development Committee

I apologize in advance for the redundancy,

Your Honourable Mayor Parrish, Council and Planning and Development Committee. For those that do not remember me or are new to Council, I am Joe Amato of [REDACTED]. I appreciate you making the time today to hear my deputation.

A Brief history. Prior to annexation of the Ninth Line Corridor by Mississauga in 2010. Mississauga's representatives (including its Councillors) promised the landowners of the Ninth Line owners Association/Corridor that our land would become developable once we joined Mississauga if we did not oppose annexation at the OMB. Upon hearing this, we stood down and did not oppose the annexation. Post annexation, and on updating of Mississauga's Official Plan soon thereafter, it became very clear that such promise was not going to be extended to three properties only of the countless number of properties in the Ninth Line corridor that were redesignated to permit development. I am one of those 3 properties that was not included in those that were promised to be developed.

On my deputation to Council on July 4, 2018, Councillor Saito (and this is all available in the minutes) was held to account, by me, on that original promise and was sympathetic and wondered aloud why these three properties were excluded and treated unfairly (and spoke to how something could be done, and that there is always a way to engineer around Flood Lines, and that the Planning Department should take another close look). She also referenced an area in her ward that had gone through something similar and was able to engineer around it. Mayor Crombie chimed in and, with respect to a point I made, had concerns and asked Head Planner Andrew Whittmore why the houses on the east side of Ninth Line were built in a flood zone. She also asked Mr. Whittmore if down the road changes were made, could something be done for these properties. Mr. Whittmore's response was 'yes'. Councillor Sue McFadden, also said that we were treated unfairly and reiterated Councillor's Saito's sentiments. Sue has been very open to listening to my issues and concerns ever since.

So, regarding an update to Mississauga's Official Plan 2051, I'm here to ask you, again, to fix the inequity and to fulfil your promise originally made to me prior to Annexation, that my land be designated for Development. I ask that this group interpret and adjust the MOP to designate 5644 Ninth Line as Development Property in Precinct 4 (which is adjacent to the future Britannia Road 407 TRANSITWAY station). I believe this is fair and completely in line with (i) the *More Homes Built Faster Act of Ontario*, (ii) Canada's very well documented shortage of housing, and (iii) the spirit of your own newly proposed MOP.

I brought all this forward at the March 18, 2024 planning and development committee meeting when the draft of the Mississauga official plan 2051 was presented. The committee asked us to meet with a subset of planners from the Planning Department who were part of the drafting of the MOP. In that meeting, we continued to express our view and comments. We note that our comments were not outlined in the comment section in appendix 4 (summary of public comments). Maybe someone can let us know why.

What remains a great cause of consternation is that during the subset meeting with the Planners, they continued to point to the current official plan that and said certain provisions could not be overridden by the MOP/2051. Namely 6.3.51 under the current plan (4.3.3.21 of the MOP/2051) and unnumbered provisions for “Natural Hazard Lands” in the current plan (4.3.3.1 in the MOP/2051). Why? They said our lands were too important to the water overflow. Interestingly, I stood by through all the studies and transformations over my time of ownership (pre the current plan) as flood plains and natural hazard boundaries were reworked to get as much development on Developer owned properties as possible, while my property was ignored. My land (at that time) was not more important than the developer lands for water control, it only became so because they pulled the developer lands out of the floodplain. Is that fair? To now point to these provisions as a complete block to consider my property as developable is disingenuous and patently unfair. Small guy with no money gets stepped on and has policy thrown in his face after the fact? If you could move the lines for others in the face of flood plain restrictions, why can you not do that for me today? Find somewhere else to send the water like you did for the Developers.

I then chuckle (with frustration, I should add) to watch this city decide to take a portion of my property to widen Ninth Line in the face of the same flood and natural hazard plan provisions that seem to block me from developing my land.

I again want my opposition to the MOP noted and would like this council to remedy the injustice.

Thank you.

Joe Amato





Development and Planning Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L5B 3C1

December 9, 2024  
 File No. 10595

**Dear Chair and Members of Planning and Development Committee**

**RE: Proposed Mississauga Official Plan 2051 Status Update  
 Development and Planning Committee Agenda Item 6.3  
 2025-2087 Dundas Street East**

Weston Consulting is the Planner for the owner of 2025-2087 Dundas Street East in the City of Mississauga (the “subject property” or “site”). The subject property is located on the north side of Dundas Street East, between Universal Drive and Southcreek Road. The site is currently occupied by several mixed use plazas including eating establishments, retail stores, offices, and healthcare services and is surrounded by commercial and employments uses. The subject property is designated *Mixed Use* according to Schedule 10 (Land Use) and is located within the *Dixie Employment Area* according to Schedule 9 (Character Areas) of the in-force Official Plan.

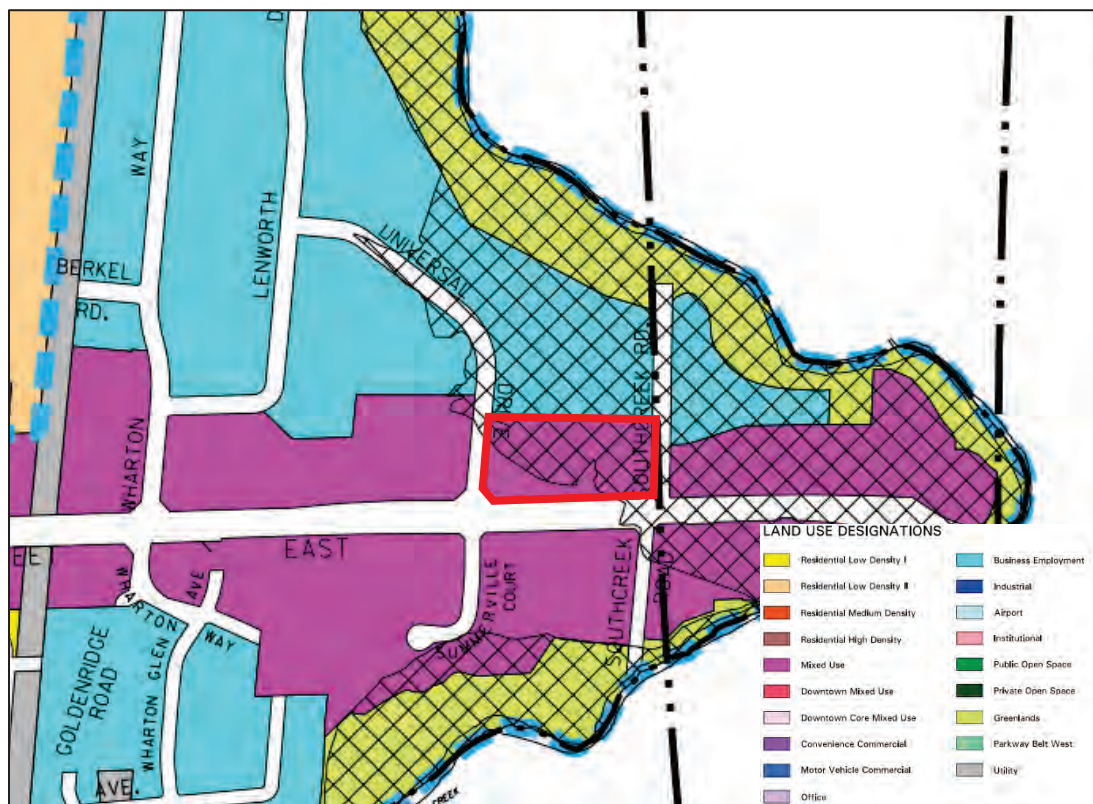


Figure 1: Location of Subject Property, Schedule 10 (Land Use Designations) of the In-Force Mississauga Official Plan

We understand the City of Mississauga is currently undertaking an Official Plan Review process. The draft Official Plan designates the subject property *Employment Commercial* according to Schedule 7K (Land Use Designations) and locates a portion of the site within the *Dixie EA Special Site* (Figure 2).



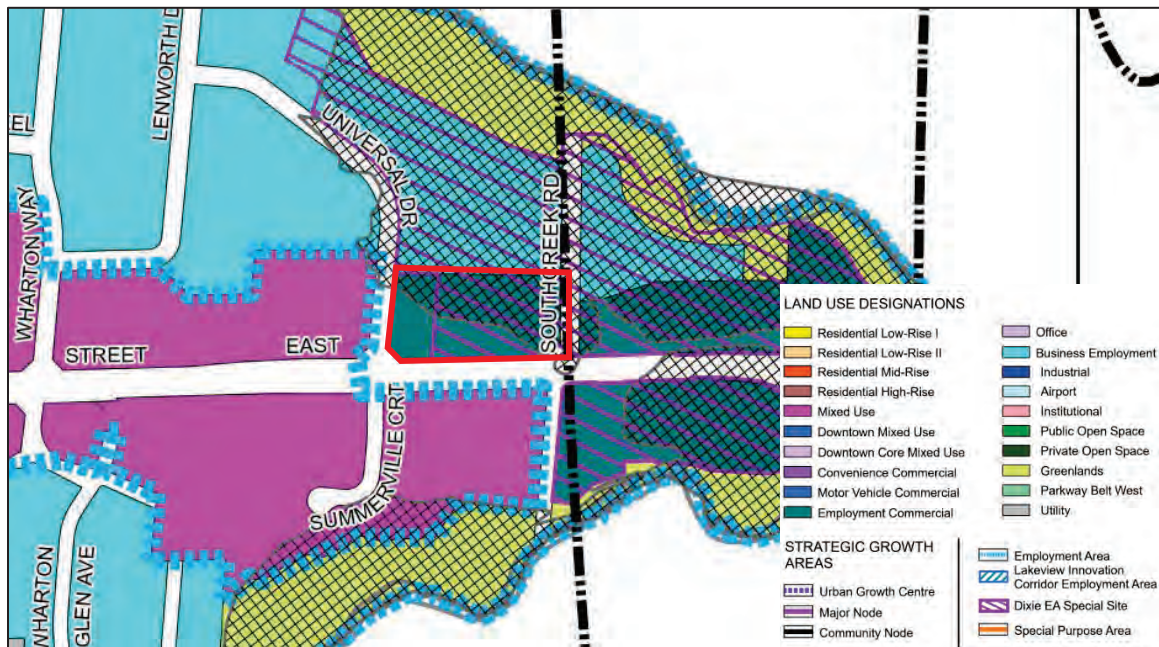


Figure 2: Location of Subject Property, Schedule 7K (Land Use Designations) of the draft Official Plan

The draft Official Plan also identifies the subject property within a Major Transit Station Area according to Schedule 1 (City Structure).

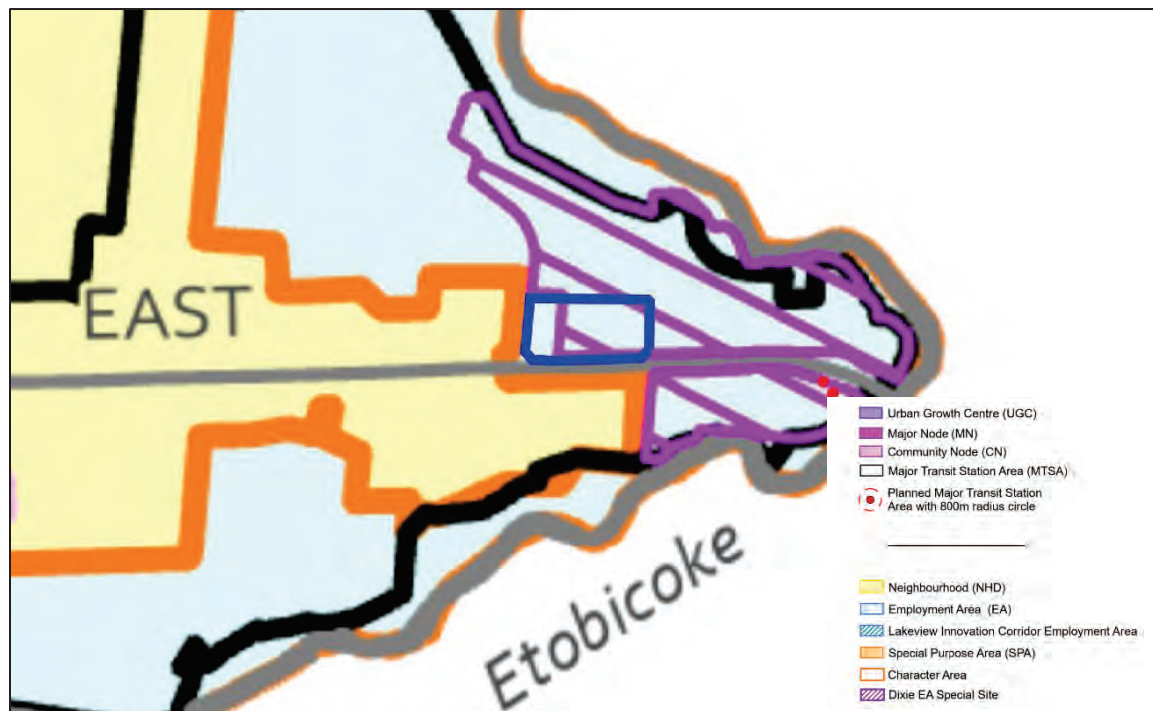


Figure 3: Location of Subject Property, Schedule 1 (City Structure) of the draft Official Plan

The owner of the subject property has an interest in monitoring and participating in the ongoing Official Plan Review process. We have previously submitted correspondence on behalf of the owner with respect to the subject property. We request to be notified on behalf of the owner of the release of any draft policies, meetings, reports, and/or decisions as it relates to the Official Plan Review process.

As such, we kindly request that Weston Consulting c/o the undersigned be added to the notification list for this matter. We reserve the right to provide further comments on behalf of the owner as it relates to this matter.

Please contact us if there are any questions.

Yours Truly,  
**Weston Consulting**  
**Per:**



Darrin Cohen, RPP, MCIP  
Senior Planner  
[dcohen@westonconsulting.com](mailto:dcohen@westonconsulting.com)  
Ext. 329

cc: Andrew Whittemore, Commissioner of Planning & Building  
Owner  
Ryan Guetter, Weston Consulting  
City Clerk's Office

December 9<sup>th</sup> 2024

Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga ON L5B 3C1

Attention: Angie Melo, Legislative Coordinator (angie.melo@mississauga.ca)

**RE: Item 6.3 Recommendation Report (All Wards) – Proposed Mississauga Official Plan 2051 – Status Update**

Dear Sirs/Mesdames,

Sajecki Planning Inc. are land use planners representing various landowners within Mississauga, and more specifically that own lands within Protected Major Transit Station Areas (PMTSAs). We submit the following letter as it relates to Item 6.3 – Proposed Mississauga Official Plan 2051 – Status Update for your consideration.

Sajecki Planning Inc. would like to express their support for the City's ongoing Official Plan (OP) Review and vision of increased height and density within PMTSAs. Our firm has been following the City's OP review closely and reporting how it may affect our clients' various sites. Specifically, we are interested in the recent updates to specific sites within PMTSAs and redesignating these sites to permit taller heights as-of-right. The redesignation of sites to permit more height as-of-right is detailed in the Status Update Report from staff dated November 27, 2024, where staff state a review of sites was conducted to evaluate planning merits on the following basis:

- *New emphasis on creating mixed use communities, increasing the housing supply and optimizing existing and planned transit infrastructure in PPS 2024.*
- *Increased urgency to deliver affordable housing amid increased fiscal challenges for housing providers.*
- *Recent development application approvals, including Ontario Land Tribunal (OLT) decisions.*

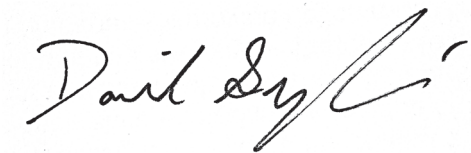
The evaluation criteria outlined above provides a high-level analysis of why specific sites were selected to accommodate more height and density. However, it is not clear why other nearby sites were not considered for similar height increases. We trust that city staff recognize the potential of many additional sites within the PMTSAs to support substantial growth and taller developments beyond what is currently proposed and encourage further study and exploration of opportunities to extend these height and density increase to a broader range of locations.

We understand that the City plans to hold a commenting period on draft PMTSA policies during the first quarter of 2025. We are eager to participate in this process and look forward to discussing the City's criteria for additional height and density further.

Thank you for the opportunity to provide our thoughts on the proposed updates to the proposed Mississauga Official Plan 2051. We support the City's efforts towards developing an updated Official Plan that will foster *"well designed, livable, and inclusive"* communities and *"will prioritize pedestrians, affordable homes, taking action on climate change, improving individual and community health and supporting jobs and businesses."*

If you have any questions, please do not hesitate to contact me at 647-497-8000 ext. 1 or [david@sajeckiplanning.com](mailto:david@sajeckiplanning.com).

Sincerely,

A handwritten signature in black ink, reading "David Sajecki". The signature is fluid and cursive, with a long horizontal stroke at the end.

David Sajecki  
MCIP, RPP, B.Eng, LEED AP  
Partner, Sajecki Planning Inc.



Development and Planning Committee  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

December 9, 2024  
File 6246-5

**Dear Chair and Members of Planning and Development Committee**

**RE: Proposed Mississauga Official Plan 2051 – Status Update  
Development and Planning Committee Agenda Item 6.3  
5787 Hurontario Street and 20 Traders Boulevard  
Related File Nos.: SPA-111724**

Weston Consulting is the planning consultant for Destination at Mississauga Inc., the registered owner of the lands municipally known as 5787 Hurontario Street and 20 Traders Boulevard East in the City of Mississauga (herein referred to as the “Subject Lands” or the “Site”). The Subject Lands are located on the south side of Traders Boulevard, east of Hurontario Street, and west of Whittle Road. The Subject Lands have an existing hotel (Hyatt Place) and the Luxe Convention Centre located on the west portion of the Site, and associated parking areas. In accordance with the in-force City of Mississauga Official Plan (“OP”), the Subject Lands are designated as *Office* and are within the *Gateway Corporate Centre Employment Area*.

A Site Plan Application (“SPA”) was submitted for the Subject Lands on November 4, 2024, and is currently in the pre-screening process. The proposed development for the Site contemplates the construction of a 7-storey extended stay hotel on the vacant northeastern portion of the Subject Lands. Minor Variance and Consent Applications were submitted to the Committee of Adjustment (“COA”) on November 6, 2024, to sever the Subject Lands to create one additional lot and an access easement. The Minor Variance and Consent Applications are anticipated to proceed to the COA once all comments have been received on the SPA.

We understand that the City of Mississauga is currently undertaking an Official Plan Review (“OPR”) process and intends to bring forward a final version of the proposed Mississauga Official Plan early next year. We have reviewed the Corporate Report dated November 27, 2024 regarding the Proposed Mississauga Official Plan 2021 – Status Update. We are familiar with the Provincial Planning Statement (the “PPS, 2024”) and the revised definition of Employment Area. It is our understanding that policy changes outlined in the new PPS, 2024 will be comprehensively reviewed as part of the ongoing OPR process.

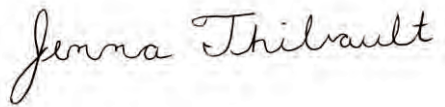
The landowner has an interest in monitoring and participating in the ongoing OPR process to review policy changes as it relates to the Subject Lands. We request to be notified on behalf of the landowner of the release of any draft policies, meetings, reports, and/or decisions as it relates to the OPR process.



We kindly request that Weston Consulting c/o the undersigned be added to the notification list for this matter. We reserve the right to provide further comments on behalf of Destination at Mississauga Inc. as it relates to this matter.

Should you have any questions please contact the undersigned at ext. 309 or Sarah Burjaw at ext. 374.

Yours Truly,  
**Weston Consulting**  
**Per:**



Jenna Thibault, BSc, MPL, MCIP, RPP  
Associate

cc: Javaid Akhtar, Destination at Mississauga Inc.  
Paras Dharamshi, Destination at Mississauga Inc.  
Anita Dharamshi, Destination at Mississauga Inc.  
Anmol Kirpalani, Destination at Mississauga Inc.  
Artan Mataj, Mataj Architects Inc.  
Ryan Guetter, Weston Consulting

Partners: **6.5****Glen Broll**, MCIP, RPP**Colin Chung**, MCIP, RPP**Jim Levac**, MCIP, RPP**Jason Afonso**, MCIP, RPP**Karen Bennett**, MCIP, RPP*In Memoriam, Founding Partner:***Glen Schnarr**March 15<sup>th</sup>, 2024

GSAI File: 1495-001

(Via Email)

Chairman and Members of the Planning and Development Committee  
 City of Mississauga  
 300 City Centre Drive  
 Mississauga, ON L3B 3C1

City Clerk  
 City of Mississauga  
 300 City Centre Drive - 2nd Floor  
 Mississauga, ON L5B 3C1

**RE: Mississauga Official Plan 2051**  
**City File: CD.02-MIS**

**3670 Hurontario Street**  
**MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC.**  
**Related File: #DARC 22-356**

Glen Schnarr & Associates Inc. (GSAI) are the authorized agents and planning consultants for MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC., owners of the property municipally addressed as 3670 Hurontario Street (herein referred to as the “subject lands”). Glen Schnarr and Associates Inc. (GSAI) is pleased to make this submission regarding the Mississauga Official Plan Review (the “draft Official Plan”) on behalf of MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC.

Planning applications for Removal of the (H) Holding Symbol and Site Plan Approval are currently underway through DARC 22-356 for the subject lands and to permit a high-rise development of two (2) interconnected mixed use, hotel and residential towers surrounding and integrated with the existing fourteen (14) storey Delta hotel at the southwest corner of Hurontario Street.

When complete, the draft Official Plan initiative will culminate in a new draft Official Plan (the “Mississauga Official Plan 2051”) that will modify the policy framework permissions for lands across the City. We understand that the final Official Plan will be considered by the Planning and Development Committee in Q2 of 2024. Following adoption by Council, the City's new Official Plan will be sent to the ultimate approval authority for final approval — either the Region of Peel or the Province of Ontario, depending on the coming-into-force date of forthcoming changes to the *Planning Act*.

We are pleased to provide the below comments on the current draft Official Plan, released on February 12, 2024 and to formally state our objection to the policies and Schedules as drafted.

### Urban Growth Centre

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the draft Official Plan. The subject lands remain in the Urban Growth Centre, Downtown Core and in Sussex District.

We object to Downtown Core policies that suggest increases in employment opportunities should be accommodated (Policies 12.2.4.2-3) and policies relating to the incorporation of office uses (Policy 12.2.4.4). The requirement for replacement of jobs or a concentration of jobs within a development is inconsistent with the development vision established by Provincial and Regional policy objectives for the Downtown Mississauga Urban Growth Centre. In accordance with the in-effect Provincial and Regional policy frameworks, an Urban Growth Centre is to provide for a range and mix of housing and employment uses to achieve high-density, mixed use areas, while supporting the creation of complete communities whereby residents are able to live, work, shop and play within their community of choice. Imposing employment minimums, quotas or thresholds is unnecessarily restrictive, will challenge the ability for lands to support the delivery of high density, compact, mixed-use forms and inadvertently places an emphasis on employment uses and density when the nature of a specific development may not warrant it. In our opinion, the provision of appropriate employment uses and density is a matter best addressed during the site-specific technical evaluation of a development application.

### Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. We object to draft Official Plan Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as provided below:

- 5.2.2. *Phased development will have a range and mix of housing types for each development phase.*
- 5.2.4. *To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*
- *social housing or other publicly funded housing; or*
  - *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*
- 5.2.5. *The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>

<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

We object to the requirement in Table 5.1 that 30% percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental tenure. The requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. Affordability guidelines and criteria need to be further examined and synthesized with Federal and Provincial criteria including the CMHC's affordable housing thresholds. Further, we object to policy statements that phased developments include a range and mix of housing types and the policy statement that 50% of new housing units be larger, family-sized or two and three-bedroom units. While we understand the intent of the policies is to encourage developments that enable housing choice, including for families, the policies as written are prohibitive and will challenge the delivery of needed housing units overall and should be considered on a site-specific basis.

### Complete Streets

We continue to object to the City's application and open-ended interpretation of how and to what extent road widenings and land conveyances can be secured and applied to development applications. New Policy 7.3.2.3 continues to provide only a general and overarching policy as to what can be secured:

*7.3.2.3 The City's multi-modal transportation network will be maintained and developed to support the policies of this Plan by:*

*b. designated right-of-way widths are considered the basic required rights-of-way along street sections. At intersections, grade separations or major physical topographical constraints, wider rights-of-way may be required to accommodate necessary features such as embankments, auxiliary lanes, additional pavement or sidewalk widths, transit facilities, cycling facilities or to provide for necessary improvements for safety in certain locations;*

The application and interpretation of this policy is inappropriate and as such we formally object to its inclusion in the draft Official Plan.

### Well Designed Healthy Communities

A new urban design-related policy framework is proposed and presented in Chapter 8, Well Designed Healthy Communities. We object to all overarching policies that stipulate urban design and building requirements. Urban design guidelines should be applied to a local area or on a site-specific basis.

Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

- 8.4.1.17. *Built form will relate to the width of the street right-of-way.*
- 8.4.5.2. *Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.*
- 8.6.2.5. *Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.*

The requirement for a built form to have a relationship to the width of the public right-of-way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location.

We object to policy statements that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards as City Standards for public open spaces do not always reflect site-specific redevelopment objectives and requirements. Provision of any POPS should be a collaborative effort between the parties involved.

We object to the introduction of urban design related policy or guidelines in the draft Official Plan including but not limited to any angular plane, views and vistas and separation distance requirements. Urban design objectives should continue to be implemented through an Urban Design Guideline document or Built Form Standard specific and appropriate to an area context. Urban design guidelines are the appropriate mechanism to facilitate the City's urban design objectives.

#### Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designation application to the subject lands and assigned to Protected MTSA (PMTSA) are illustrated on draft Schedule 8. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10 and on Schedule 7 – Land Use Designations, which does not illustrate the Downtown Mixed Use designation category.

Additionally, the policy framework presented by Policies 11.3.2 and 11.3.3 which provides that development on Downtown Mixed Use designated lands which results in a loss of non-residential floor space will not be permitted unless the planned function of the non-residential component will be maintained or replaced as part of redevelopment. As stated above, we object to any policy requirements that require replacement or increases of non-residential or employment area as this objective needs to be considered on a site-specific and development specific basis.

#### Sussex District

Policy 12.2.3.8 suggests that opportunities exist for additional office, ancillary and residential development in the Sussex District. As above, we object to any policy requiring employment or office development in any component of a redevelopment as it should be considered on a site-specific basis that considers the subject lands existing circumstances, built form, context, constraints and opportunities. We also object to requirements imposing reinvestments in the public realm through a development application. Improvements to the public realm should have consideration for the existing built form, nearby rights-of-way,



configuration of streets and sidewalks and other constraints before any informed decision can be made on their suitability and applicability through a site-specific development application.

#### Schedules and Mapping, Relationship to the Public Realm

On draft Map 12-2.3, a Proposed Pedestrian Connection on the subject lands or on Burnhamthorpe Road West is illustrated. As it is not clear to what the pedestrian connection will consist of and where exactly it will be located. We object to the illustration of a pedestrian connection in this location and it should be removed on the next iteration of the draft Official Plan.

On draft Map 12-2.7 – Downtown Core A & B Street Frontage, Sussex Gate and Enfield Place, adjacent to the subject lands are illustrated to be B Streets while Hurontario Street and Burnhamthorpe Road West are illustrated to be A Streets. We object to all policies that stipulate access, entrance or built form restrictions to either an A or B Street. In the case of the subject lands, there is an existing access to Hurontario Street and an operating hotel. The development contemplates retention of both and consideration in the A & B Street policies needs to be had for existing circumstances and on a site-specific basis where the A & B Street policy requirements cannot be met.

Policies 12.2.8.21 a-d. provide for requirements for above-grade parking structures and suggest that integrated above-grade parking structures will not directly front on to public streets and that they are required to have active or retail uses on the ground floor. We object to this policy requirement as the design of a podium or above grade parking structure should be developed on a site-specific basis and in consideration for existing constraints and opportunities.

Lastly, on Figure 12.5, an illustration provides for how podium and stepbacks are to be designed and provides for an angular plane and stepping requirements on a streetwall through build-to lines. We object to this requirement being imposed on the subject lands as existing buildings or redevelopment in an already constrained area may not be able to achieve these objectives specifically and as illustrated on draft Figure 12.5.

#### Glossary and Implementation

The draft Official Plan contains a refined glossary of key terms in Chapter 18. Of particular concern is the refined definition of the term “compatible”. Chapter 18-4 of the draft Official Plan states the term compatible is to be defined as follows:

*“means development that enhances the site and surrounding area without introducing unacceptable adverse impacts. Evaluating impacts includes considering contextually relevant matters such as land use, massing, scale, the environment, health, safety, noise, vibration, dust, odours, traffic, sunlight, shadow and wind. Compatible should not be narrowly interpreted to mean “the same as” or “being similar to”.”*

We object to the revised definition of compatible. As written, this definition does not adequately capture that compatibility can be interpreted in a variety of ways, however, compatible development does not require that existing conditions be replicated but rather a development can differ from existing development without creating unacceptable adverse impacts. The proposed definition can be narrowly interpreted and may result in a greater range of aspects to be considered in the evaluation of whether a development can be understood to be compatible. Furthermore, the term compatible is a term that is used extensively throughout the draft Official Plan and in sections relating to the Downtown Core.



The draft Official Plan provides for new language (Policy 17.6) relating to the implementation and use of a Holding symbol to address specific requirements. We note and specifically object to the City's application of the word "provision of" whereas the current and in-force Official Plan provides that the "adequacy of" requirements be implemented prior to a Holding symbol being lifted. Use of the word "provision" suggests that all of the requirements listed will be required in an application to lift the Holding symbol, regardless of their necessity on a site-specific basis.

#### Summary

In summary, we object to the proposed policy and revisions outlined in the draft Official Plan. Given any development application must consider and conform with the Mississauga Official Plan in its totality, it is our opinion that many of the proposed policies are overly and unnecessarily restrictive and not appropriate to context or for the subject lands. Please continue to include GSAI in the Official Plan review initiative and any future updates, meetings and timelines to review and provide comments on new iterations the draft Official Plan prior to adoption.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

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Bruce McCall-Richmond, MCIP, RPP  
Senior Associate

cc. Ben Phillips, Project Manager, Official Plan Review

**VIA EMAIL**

June 24, 2024

City of Mississauga  
Official Plan and Zoning Services  
300 City Centre Drive  
Mississauga, ON  
L5B 3C1

Attn: Amina Menkad, Project Lead, Official Plan Review

**Re: New Draft Official Plan Release (February 2024)**  
**City File: CD.02-MIS**  
**Preliminary Comments on Behalf of Choice Properties REIT**  
**Multiple Properties**  
**Mississauga, Ontario**  
**Our File: CHO/MIS/20-01**

We are the planning consultants for Choice Properties REIT and all affiliated corporations and entities that own lands on behalf of Choice Properties REIT (collectively the “**Choice Entities**”) regarding the Mississauga Official Plan (“OP”) Review process. We are submitting this comment letter to the City of Mississauga on behalf of the Choice Entities, which own the properties specifically identified on **Schedule “A”**.

At this time, Choice is undertaking minor infill development activity for certain landholdings in Mississauga, and in general seeks to maintain existing operations as well as other opportunities for future infill and expansion.

On behalf of Choice, we have been monitoring the ongoing review process for the City of Mississauga’s Official Plan. We reviewed the Bundles 1-3 policy releases, and provided comments to the City dated March 30, 2022, August 8, 2022, and July 31, 2023 respectively.

#### **CITY OF MISSISSAUGA OFFICIAL PLAN REVIEW**

Based on our review of Draft Schedule 7, we note the Choice lands are proposed to be designated as follows:

- The lands at 2095 Meadowvale Boulevard, 6611 Edwards Boulevard, 580 Secretariat Court, 7430 Pacific Circle, 6290 Kestrel Road, 6920 Columbus Road, 6956 Columbus Road, 690 Gana Court, 2050 Drew Road, 2155 Drew Road, and cluster of Choice lands with frontage onto both Ambassador Drive and Excelsior Court are all proposed to **maintain the Business Employment designation**;
- The lands at 1115 Cardiff Boulevard, 6815 Columbus Road and 6895 Columbus Road are proposed to **maintain the Industrial designation**;
- 3050 Argentia Road is proposed to be **redesignated from Mixed Use to Employment Commercial**;
- 3045 Mavis Road, 3020 Elmcreek Road, and 1250 South Service Road are proposed to **maintain the Mixed Use designation**; and

- 2901-2925 Eglinton Avenue West, 2815 Eglinton Avenue West, 2933 Eglinton Avenue West, and 5010 Glen Erin Drive are proposed to **maintain the Mixed Use designation within the Central Erin Mills Major Node.**

We note that the lands at 3055 Vega Boulevard are shown as maintaining the current Mixed Use designation on Draft Schedule 7; however, the site is further subject to MOPA 142, which implements the City's Protected Major Transit Station Area ("PMTSA") framework. MOPA 142 was adopted by Council on August 10, 2022, and subsequently approved by Peel Region on April 11, 2024. We note that upon Regional approval, MOPA 142 redesignated 3055 Vega Boulevard to a new Mixed Use Limited designation specific to former Employment Area lands now identified within PMTSAs.

At this time, our preliminary comments for the Draft OP are as follows:

- We note that Bill 185 received Royal Assent on June 6, 2024, and is fully in effect. There are a number of modifications to the *Planning Act* that may impact or conflict with the Draft OP, including the role of the Region of Peel, the nature of pre-consultation requirements, no minimum parking requirements within a PMTSA, among other matters. We will continue to monitor the Draft OP review as it relates to implementation of recent legislative changes, including Bill 185.
- On Schedule 7 of the Draft OP, the Natural Hazard Area boundary is identified within the lands at 7430 Pacific Circle, whereas the in-effect Official Plan does not identify the Natural Hazard Area overlay in proximity to these lands. We seek clarification as to the expansion of the Natural Hazard Area, and whether this is based on any specific background study or analysis.
- Draft Policy 4.3.8 relates to buffers from natural heritage features, and notes that "*Generally, buffer widths will be at least 10 metres from the limits of the natural heritage features...*". Subsequent Draft Policy 4.3.10 provides several criteria to determine the "*appropriate buffer width*". In our submission, Draft Policy 4.3.8 should be revised to replace "will" with "should", in order to allow for the appropriate buffer width to be determined through technical review and in consideration of the criteria of 4.3.10, including buffer widths less than 10m where appropriate.
- Draft Policy states "*4.3.3.1 Natural Hazard Lands and buffers will be designated Greenlands and zoned to protect life and property. Uses will be limited to conservation, flood and/or erosion control, essential infrastructure and passive recreation*". As noted, the Draft OP proposes to extend the boundary of the Natural Hazard Area overlay into the Choice Lands at 7430 Pacific Circle. Accordingly, we have concern that those lands are to be designated and zoned Greenlands as a result of the expanded mapping of the feature, and we suggest that the mapping be revised to reflect the current extent of the Natural Hazard.
- Draft Policy 5.2.2 states: "*Phased development will have a range and mix of housing types for each development phase.*" In our submission, draft Policy 5.2.2 should be revised to specify that a range and mix of housing types is required only when residential uses are proposed, as the current policy would infer that all development that is phased is required to provide a range and mix of housing types.
- Draft Policies 9.4.1 – 9.4.3 state:
  - .1 "*Retail uses are encouraged to locate primarily within the Urban Growth Centre, Major Nodes and Community Nodes.*"

*.2 “Retail uses outside the Urban Growth Centre, Major Nodes and Community Nodes will be directed to Major Transit Station Areas or in locations as identified in Character Area policies.”*

*.3 “Retail uses may be permitted within Neighbourhoods to provide retail uses convenient to the local residents. Character Area policies or local area plans will identify appropriate locations and types of uses.”*

In our opinion, there are numerous instances where retail and commercial uses are existing and appropriate outside of identified growth areas, and we suggest that the aforementioned policies be reconsidered. For example, the Choice Lands at 1250 South Service Road are occupied by Dixie Mall, and include a grocery store that serves the local community. Those lands are within a Neighbourhood, which the policy suggests is generally not an appropriate location for commercial uses to be directed to. In our submission, the hierarchical nature of these policies is contrary to provincial direction to encourage the development of complete communities that serve the daily needs of residents, and should be revised.

- Draft Policy 9.4.5 states: *“The dispersion of retail uses beyond designated commercial areas will be discouraged”*. In our submission, there are other land use designations, including the various “Mixed Use” designations, “Residential” designations, and others, that are appropriate to accommodate retail uses. We suggest this policy be removed.
- Draft Policy 10.2.6.3 states: *“Redevelopment of Mixed Use sites must maintain the same amount of nonresidential floor space”*. In our submission, it may not be feasible or appropriate to maintain the same amount of non-residential floor space in a redevelopment context, and we suggest that this policy introduce flexibility. We suggest that “must” be replaced with “is encouraged to”.
- Draft Policy 10.2.6.4 specifies that residential dwelling units are not permitted on the ground floor. In our submission, there may be instances where ground oriented dwelling units may be desirable and appropriate, and we suggest that the policy be revised to introduce flexibility.
- Draft Policies 13.2.3.5.1 – 13.2.3.5.6 are similar (or the same) as policies of MOPA 115 of the existing Official Plan, being policies 13.2.5.1 – 13.2.5.6. As the City is aware, the Ontario Land Tribunal refused to approve these policies (except for 13.2.3.5.2) in the context of the appeals of MOPA 115 (see *Calloway REIT (Mississauga) Inc. v. Mississauga (City)*, 2023 CanLII 83079 (ON LT)) and that decision was upheld by the Chair of the Ontario Land Tribunal after the City requested an internal review. We understand that the City has sought leave to appeal this decision to the Divisional Court. In our submission, the inclusion of Policies 13.2.3.5.1 – 13.2.3.5.6 in a manner that is similar or the same as what was included in MOPA 115, is inappropriate, given that the Ontario Land Tribunal has held that these policies are not a proper exercise of the City’s authority under the *Planning Act*. Accordingly, Policies 13.2.3.5.1 – 13.2.3.5.6 should be deleted in their entirety.
- Draft Policy 15.4.9.3 states: *“no major retail developments will be permitted, except where major retail uses are lawfully established on lands designated Employment Commercial at the time this Plan comes into effect.”* We seek clarification as to whether existing major retail uses in the Employment Commercial designation will be permitted to undertake minor infill and/or expansion activity, which can



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June 24, 2024

contribute to the number of jobs per hectare within Employment Areas.

We will continue to review the Draft Official Plan releases and subsequent revisions, and will provide further comment on behalf of our client once fulsome information has been released for consultation as needed.

We would welcome the opportunity to meet with Staff to discuss our comments further.

Please kindly ensure that the undersigned is notified of any further meetings with respect to this matter, as well as Notice of applicable decisions. We request that a copy of this letter be provided to Council prior to any decisions being made on this item.

Yours very truly,

**ZELINKA PRIAMO LTD.**



Rob MacFarlane, MPL, MCIP, RPP  
Senior Associate

cc. Choice Properties REIT (via email)  
Official Plan Review Team (via email)

## Schedule "A"

Municipal Address	Registered Owner
170 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
171 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
190 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
2050 Drew Road	CANADIAN PROPERTY HOLDINGS INC.
210 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
2155 Drew Road	CANADIAN PROPERTY HOLDINGS INC.
260 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
280 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
281 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
300 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
301 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
320 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
360 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
361 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
380 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
420 Ambassador Drive	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
580 Secretariat Court	CP REIT ONTARIO PROPERTIES LIMITED
6290 Kestrel Road	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
6611 Edwards Boulevard	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
6670 Excelsior Court	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.

6680 Excelsior Court	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
6681 Excelsior Court	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
6815 Columbus Road	CANADIAN PROPERTY HOLDINGS INC.
6895 Columbus Road	CANADIAN PROPERTY HOLDINGS INC.
690 Gana Court	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
1115 Cardiff Boulevard	CP REIT ONTARIO PROPERTIES LIMITED
6920 Columbus Road	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
6956 Columbus Road	CANADIAN PROPERTY HOLDINGS INC.
7430 Pacific Circle	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
1250 South Service Road	CP REIT ONTARIO PROPERTIES LIMITED
2901-2925 Eglinton Avenue West	CANADIAN PROPERTY HOLDINGS (WINSTON CHURCHILL ONE) INC. CANADIAN PROPERTY HOLDINGS (WINSTON CHURCHILL TWO) INC.
2933 Eglinton Avenue West	CANADIAN PROPERTY HOLDINGS (WINSTON CHURCHILL ONE) INC. CANADIAN PROPERTY HOLDINGS (WINSTON CHURCHILL TWO) INC.
3045 Mavis Road / 3020 Elmcreek Road	CP REIT ONTARIO PROPERTIES LIMITED
3050 Argentia Road	CP REIT ONTARIO PROPERTIES LIMITED
3050 Vega Boulevard	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
3055 Vega Boulevard	CANADIAN PROPERTY HOLDINGS (ONTARIO) INC.
5010 Glen Erin Drive	CP REIT ONTARIO PROPERTIES LIMITED
2095 Meadowvale Boulevard	CP REIT ONTARIO PROPERTIES LIMITED

June 27, 2024

**City of Mississauga**

Planning and Building Department  
Mississauga Civic Centre  
300 City Centre Dr  
Mississauga, ON L5B 3C1

**Attention: Mr. Ben Phillips**

Dear Mr. Phillips

**RE: 5040 - 5060 Spectrum Way & 5150 Spectrum Way**  
**Comments Re: Mississauga Official Plan Review**  
**TBG Project Number: 24143 & 24144**

On behalf of our clients 5150 Spectrum Nominee Ltd., the owners of 5150 Spectrum Way and 1232429 B.C. Ltd., the owners of 5040 – 5060 Spectrum Way (“Clients”), the Biglieri Group has prepared the following letter requesting greater flexibility to the uses permitted in the Draft Mississauga Official Plan 2051 for the lands municipally known as 5040 - 5060 Spectrum Way and 5150 Spectrum Way, Mississauga (“Lands” or “Subject Lands”). This letter provides an overview of the planning and regulatory framework that currently governs the Subject Lands, changes as per the new Draft Official Plan, and the uses that we propose for the Lands.

Figure 1: Subject Lands



Source: VuMaps, 2024

## SUBJECT LANDS AND SURROUNDING LAND USES

The Subject Lands are located west of Eglinton Avenue East, southeast of Spectrum Way and north of Etobicoke Creek. Land uses surrounding the Subject Lands are predominantly employment focused and consist of the following:

- North: Located north of the Subject Lands there is a six-storey office building and an associated parking lot. To the northwest there is a plaza containing one storey buildings that house employment uses and their associated surface parking lots.
- East: Located immediately east of the Subject Lands is Eglinton Avenue East. East of Eglinton Avenue East there is a plaza containing restaurants and retail uses in addition to Centennial Park, which is a large open green space.
- South: Located south of the Subject Lands is Etobicoke Creek and an associated walking trail. Further south of Etobicoke Creek there are midrise office buildings and associated surface parking lots.
- West: Located west of the Subject Lands is a four-storey and a six-storey office building and associated surface parking lots.

## LOCAL PLANNING FRAMEWORK

### City of Mississauga Official Plan (Office Consolidated March 4, 2024)

The Subject Lands are designated *Business Employment* on Schedule 10 – Land Use Designations of the City of Mississauga Official Plan (“Mississauga OP”). The Lands may also contain some *Greenlands* designated areas to the southwest that is associated with Etobicoke Creek. Additionally, the Lands are located within the *Airport Corporate Centre Character Area* as per Schedule 9 of the Mississauga OP. Spectrum Way is classified as a *Minor Collector Road* per Schedule 5 of the Mississauga OP. Eglinton Avenue is classified as an *Arterial Road* and is identified as a *Corridor* by Schedule 1c - Urban System.

As per Chapter 10 of the Mississauga OP “Fostering a Strong Economy”, OP policies strive to encourage and support the development of a range of employment opportunities within the City. The *Business Employment* land use designation as outlined in Chapter 11 implements these visioning policies by supporting a diversity of employment uses. Chapter 15 provides further directions on land use planning for the Subject Lands through *Corporate Centre* policies. Per Policy 15.1.1.1, *Corporate Centre Character Areas* are specifically intended to be home to office development and other uses with high employment densities.

The current uses that are permitted within the *Business Employment* designation by the in-force Mississauga OP consist of a range of employment uses such as: manufacturing, research and development, self-storage facilities, and warehousing, distribution, and wholesaling, amongst others. However, policies outlined in Chapter 15, “Corporate Centres”, further restricts permitted land uses for the Subject Lands. The Subject Lands are located within the Airport Corporate Centre and are subject to Policy 15.2.2.1.1 Special Site 1, which outlines that:

*Notwithstanding the provisions of the Business Employment designation, the following uses will not be permitted:*

- *new industrial uses including*



- *manufacturing,*
- *warehousing, distribution, and wholesaling, and*
- *outdoor storage and display;*
- *freestanding retail commercial uses; and*
- *financial institutions.*

*However, existing industrial uses will be permitted to continue and expand.*

Additionally, buildings are to be a minimum of two storeys within 500 metres of the Spectrum and Orbitor stations. Development will have a minimum floor space index of 0.5 and must demonstrate the ability to achieve 1.0 FSI overtime.

#### Draft Mississauga Official Plan 2051

In the Draft Mississauga Official Plan 2051 (“Draft Mississauga OP”), the Subject Lands remains designated as *Business Employment* and continues to be located within the *Airport Corporate Centre*, however the *Airport Corporate Centre* is identified as an *Employment Area* rather than a *Character Area*. Another significant change to the local policy framework for the Subject Lands within the Draft Mississauga OP is that they are identified as being within the *Spectrum Protected Major Transit Station Area (PMTSA)*.

Chapter 3 of the Draft Mississauga OP forecasts population and employment growth to provide a basis for how and where the City will grow. Policy 3.2 of the Draft Mississauga OP forecasts that there will be 590,000 jobs in the City of Mississauga by 2051. This forecasted employment growth will be supported by policies set out in Chapter 9 of the Draft Mississauga OP titled “Supporting Jobs and Businesses”. Policy 9.1.1 stipulates that the City will encourage a range of employment opportunities reflecting the skills of the resident labour force. Policy 9.1.3 further states that the City will ensure “an adequate supply of lands providing locations for a variety of appropriate employment uses will be maintained to accommodate the City’s growth forecasts and to support a vibrant and sustainable local economy”.

General land use permissions for the *Business Employment* designation are outlined in Chapter 10 of the Draft Mississauga OP and are consistent with the in-force Mississauga OP. As such, they include manufacturing, research and development, self-storage facilities, and warehousing, distribution and wholesaling, amongst others.

Chapter 11 of the Draft Mississauga OP outlines policies that apply to designated *Protected Major Transit Station Areas (PMTSA)*. As per Policy 11.5 and Schedule 8, the *Spectrum PMTSA* has a minimum height requirement of 2 storeys. As per Table 11-1, the *Spectrum PMTSA* has a minimum resident and job combined/hectare of 160 and a minimum FSI of 1.00.

Chapter 15 of the Draft Mississauga OP outlines policies for *Employment Areas*, which includes the *Airport Corporate Centre*. Policy 15.4 further refines permitted land uses that apply to general land use designations within *Corporate Centres*. As per Policy 15.4.7, the following land uses are not permitted in the *Business Employment* designation: outdoor storage and display areas not related to a permitted manufacturing use; self-storage facilities; and warehousing, distribution, and wholesaling uses, amongst others. Per Policy 15.4.7, major offices and post-secondary education facilities are permitted uses within the *Business Employment* designation notwithstanding the Draft Mississauga OP’s general

land use policies. The following sections outline the uses that our client is seeking to permit on the Subject Lands and a rationale for why they could be appropriately supported.

#### Mississauga Zoning By-law 0225-2007

The Subject Lands are zoned *Employment in Nodes Exception 19 (E1-19)*. The *E1 Zone* permits the following uses: Medical Office; Office; Manufacturing Facility; Science and Technology Facility; Warehousing/Distribution Facility; Medicinal Product Manufacturing Facility; Medicinal Product Manufacturing Facility – Restricted; Plant-Based Manufacturing Facility; Commercial School; Financial Institution; Veterinary Clinic; Banquet Hall/Conference Centre/Convention Centre; Overnight Accommodation; Active Recreational Use; Entertainment Establishment; Recreational Establishment; University/College; and Courier/Messenger Facility.

The E1-19 Exception Zone further amends the uses that are permitted in the E1 Zone as follows. Manufacturing Facility and Warehousing/Distribution Facility are not permitted uses within the E1-19 Zone. Additional permitted uses in the exception zone include: manufacturing facility legally existing on the date of passing of this By-law; warehouse/distribution facility legally existing on the date of passing of this By-law; and repair service as an accessory use in compliance with Subsection 8.1.2 of this By-law.

#### **PROPOSED USES**

Our clients propose that permissions for the Subject Lands as outlined by the Draft Mississauga OP be revised to include industrial uses such as warehousing, manufacturing, self-storage, small bay industrial, and contractor service shop uses. As outlined in the Mississauga Zoning By-law 0225-2007, the following are definitions of the proposed uses:

- Warehousing: means a building, structure or part thereof, used for the storage and/or distribution of goods and may include the temporary on-site storage of commercial motor vehicles for freight handling of goods directly related to the permitted use(s).
- Manufacturing: means a building, structure or part thereof, used for the production of audio and video recording and/or altering, assembling, fabricating, finishing, inspecting, making, processing, producing, treating or repairing items and may include the temporary on-site storage of commercial motor vehicles for freight handling of goods directly related to the permitted use(s).
- Industrial: means a mixed use, building, structure or part thereof, occupied by more than one occupant, where a minimum of 50% of the building gross floor area (GFA) – non residential is used for an industrial/ manufacturing facility, and the balance of the building gross floor area (GFA) - non-residential may contain other permitted uses.
- Small bay industrial uses are not defined terms in the Mississauga ZBL 0225-2007, however the term is being used to denote smaller-scale industrial uses that may service local operations.
- Self-storage facility is not a defined term in the Mississauga ZBL 0225-2007, however the term is being used to denote a property consisting of individual storage spaces that a tenant uses to store personal items. A number of site specific zoning provisions within the Employment Zone permit ‘self storage facility.’

- Contractor service shop is not a defined term in the Mississauga ZBL 0225-2007, however it is being used to denote a space for the storage of materials or equipment, and where a contractor may perform assembly work and would include related administrative space. Again, a number of site specific zoning provisions within the Employment Zone permit 'contractor service shop.'

In addition to allowing for the above outlined uses, it is important for policy to contain flexibility in terms of height and area minimums to support the diverse and changing requirements of different market-driven land uses. Implementing height minimums in the Draft Mississauga OP, as are implemented through *Spectrum PMTSA* policies, may result in limiting feasible land uses unduly.

## ANALYSIS AND CONCLUSION

Our clients believe that there is a substantial market of businesses that are looking for spaces that can support warehousing, manufacturing, self-storage facilities, contractors service yards, and small bay industrial uses. Permitting these uses would contribute to the diversification of industries in the *Airport Corporate Centre Character/Employment Area* and would increase the employment opportunities that are available to Mississauga residents. Further to this, allowing for more permissive policies would support the City in meeting forecasted employment growth targets for both the City and for the *Spectrum PMTSA* as outlined in the Draft Mississauga OP.

It is also important to note that the proposed uses for the Subject Lands are compatible with neighbouring land uses. For example, the nearby property to the north of the Subject Lands, located generally at 5155 Spectrum Way, houses approximately 37 small bay industrial buildings and is an example of the uses that are being sought, and that we hope the future Official Plan can permit. Through the implementation of appropriate urban design treatments, the proposed land uses could be suitably incorporated into the surrounding built environment. For these reasons, we find that the Subject Lands would appropriately support the above outlined uses and that these policy permissions would help the City to achieve policy objectives and growth targets set out by both the in-force Mississauga OP and the Draft Mississauga OP.

We trust that you will find all in order; however, should you have any questions or require any additional information, please contact the undersigned at your earliest convenience.



Mallory Nievas, MCIP, RPP  
Associate



Alex Walton, MPI  
Junior Planner



June 28, 2024

Ben Phillips  
Project Manager, Official Plan Review  
City of Mississauga  
Mississauga Civic Centre  
300 City Centre Dr  
Mississauga, ON  
L5B 3C1

Dear Mr. Phillips:

**RE: Comments on the Draft Mississauga Official Plan 2051**

Urban Strategies Inc. is acting on behalf IMH 1315 Silver Spear Ltd., IMH 1475 Bloor Ltd., IMH Havenwood Williamsport Ltd. ("Starlight Developments") in submitting comments on the new Draft Mississauga Official Plan 2051 (MOP 2051) policies in general and with respect to 1315 Silver Spear Road (the "Silver Spear Site"), 1475 Bloor Street (the "Bloor Site"), 3450 Havenwood Drive and 1485 Williamsport Drive (the "Pacific Way Site").

**Overview of Comments, Concerns and Recommendations**

1. The Residential High-Rise designation would be more appropriate than Residential Mid-rise for the Bloor and Silver Spear Sites.
2. The policy framework for the height of mid-rise buildings is confusing and should be revised or edited for clarity;
3. Lands that are designated Residential Mid-Rise should be permitted to have building heights up to the width of the right-of-way onto which they front (consistent with draft Policy 10.2.5.8), with added recognition that heights greater than the right-of-way may be appropriate under certain and contexts, and not be otherwise limited to 8 or 12-storeys (10.1.5.8; 13.3.2.3);
4. Maximum building heights in the Neighbourhoods should not be tied to the tallest existing building on the property (14.1.3.3);
5. The Erin Mills Major Node and Mall-based Community Node policies that require 10% affordable housing should be removed before the Plan is adopted (13.2.3.5.1 and 13.3.3.4.1); and
6. Limitations on above grade parking (12.2.8.21.b) may make providing adequate parking challenging, particularly in a rental tenure scenario.



### Mid-Rise Height Policies are Not Clear

The Draft MOP 2051 is moving to form-based designations in a stated attempt to increase mid-rise development. The Draft MOP 2051 addresses the height of mid-rise buildings in a number of disconnected sections that makes interpreting the Plan's intentions confusing.

For example, there are several locations where the height of mid-rise buildings specifically or height maximums more generally, are discussed directly or indirectly:

#### **Chapter 8 – Well Designed Healthy Communities, 8.6 Buildings and Site Development, section 8.6.1 Buildings and Building Types, b. Mid-rise buildings.**

This section provides a qualitative overview of the mid-rise building form. It states:

*“Mid-rise buildings: in Mississauga, mid-rise buildings are generally higher than four storeys with maximum heights as prescribed by area-specific policies and land use designations. Their height should not exceed the width of the right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context”.*

Policy 8.6.1.3 states,

*“Mid-rise buildings will be designed to*  
*a. maintain street proportion and open views of the sky from the public realm by stepping back building massing in accordance with this Plan's policies and applicable City guidelines;*  
*and*  
*b. allow for daylight and privacy for units by providing appropriate facing distances, building heights, angular planes and step-backs.*

#### **Chapter 10 – Land Use Designations, 10.2 General Land Use, section 10.2.5 Residential**

This section provides a quantified description of the various residential designations, including Residential Mid-Rise. Policy 10.2.5.8 states,

*“Lands designated Residential Mid-Rise will permit dwelling units in buildings with heights that are:*  
*a. at least 5 storeys;*  
*b. no greater than the width of the street right-of way that they front onto, up to a maximum of 8 storeys; and*  
*c. subject to Character Area and Special Site policies”.*

Further adding to the complexity, the Glossary contains a definition of a Tall Building, which states,

*“Tall Building means a building having a height greater than the width of the street on which they front.”*

One would assume that by the inverse, a mid-rise building is a building with a height equal to or less than the width of the right-of-way. However, policy 10.2.5.8 would suggest that a building is no longer a mid-rise if it is taller than 8-storeys, regardless of whether the right of way is wider than this height.

This leads to confusion, as in circumstances where a building is taller than 8 storeys but shorter than the width of the right-of-way, it would not be considered a mid-rise as per 10.2.5.8.b, nor a tall-building as per this Glossary definition. Accordingly, it appears as though the mid-rise policies are not internally consistent nor resolved.

Pursuing the direction of 10.2.5.8.c to review the Character Area and Special Site policies, the confusion persists, in particular due to the inclusion of the use of “and” instead of “or” to relate (b) and (c). The Silver Spear Site will be referenced as an example. This Site is contained in the Rathwood-Applewood Community Node (CN) Character Area. Section 13.3.2 Land Use, policy 13.3.2.3 states, “*Lands within the Community Nodes that are designated Residential Mid-Rise will permit buildings up to 12 storeys, unless otherwise specified ...*”. How can a site be in conformity with a height limit of 8 storeys per 10.2.5.8.b AND in conformity with 10.2.5.8.c, which points to the CN policies and permits a maximum of 12 storeys?

This 12-storey cap in the CN policies is further confused by the following policy in section 13.3.3 “*Mall-based Community Nodes*”, that also applies to the Silver Spear Site and simply states, “*A maximum building height of 18 storeys will apply*” (13.3.3.2.2). There is nothing in the draft MOP 2051 that suggests there is a limitation as to where this policy applies. We therefore also recommend that policy 10.2.5.8 be revised to acknowledge that under some circumstances a mid-rise building could be an appropriate form even if larger in height than the width of the right-of-way. It is not unreasonable to interpret that a mid-rise building with a height equal to or less than the adjacent right of way – in this case, 50 metres or approximately 16 storeys – is permitted on this Site by the policy associated with the underlying Residential Mid-Rise designation, and consistent with the Node-wide cap of 18 storeys.

The above comments are provided as insight into the complexity of the structure of the Mississauga Official Plan, and challenge for readers seeking information on their properties. The application of the Character Area policies is not always immediately clear, and the effect and malleability of the underlying designations are not as intuitive as likely intended. We recommend clarify this across the MOP 2051 document.

#### **Permit Mid-Rise Buildings to be as Tall as the Right of Way they Front Onto**

We also recommend simplifying the application of the “*Mid-rise Residential*” designation by permitting buildings to be generally equal to the height of the right-of-way onto which they front. The purpose of this policy is to maintain good street proportion and a sense of enclosure while not compromising sky-view for pedestrians. The 8-storey cap is arbitrary and undermines the potential benefit of urban enclosure on the wide rights-of-way that are common in the City of Mississauga, and reduces opportunity to support housing supply while being sensitive to context per 10.2.5.9. There may also be some conditions under which a mid-rise building that is taller than the width of the right-of-way onto which it fronts is appropriate, subject to the intentions stated in Policy 8.6.1.3.

Accordingly, we recommend revising policy 10.2.5.8 so that it reads:

*“Lands designated Residential Mid-Rise will permit dwelling units in buildings with heights that are:*

- a. at least 5 storeys;*
- b. generally no greater than the width of the street right-of-way they front onto, recognizing that in some conditions a mid-rise building may be taller than the right of way up to a maximum of 8 storeys; and*
- c. subject to Character Area and Special Site policies.”*

This would continue to allow and enable a form of development that Staff have identified as desirable while maintaining public realm relationships to public streets and creating more incentive and opportunity to develop at this mid-scale and in this highly efficient form.

This policy change is recommended to apply to all “Residential Mid-Rise” designated lands across the city, however, it could be limited to Community Nodes as areas of greater change and density.

As described in an earlier section, the fractured structure of the MOP 2051 leads to a general lack of clarity around the maximum height of mid-rise buildings throughout the city.

#### **Height Should Not Be Tied to Existing Tallest Building**

The Draft MOP 2051 moves policy 16.2.3.1 out from the Applewood Neighbourhood Character Area and into the General Neighbourhoods Character Area policies (14.1.3.3). This broadens its application to all Residential designated sites in the Neighbourhoods. This policy imposes a height cap on all lands designated Residential Mid-Rise and High-Rise corresponding to the height of any building on the property, and further requires on-site height reductions to transition to lands designated Residential Low-Rise.

Additionally, the draft MOP 2051 proposes to strengthen the language related to maximum heights being based upon the tallest building on a property, changing the existing policy (16.2.3.1) from “should not exceed the height of any existing buildings on the property, [...]”, to (14.1.3.3) “will not exceed the height of any existing buildings on the property, [...]”.

We recommend this policy be removed from the MOP 2051. This is not an appropriate approach to planning a large, metropolitan city facing development pressure and a well-documented housing crisis. This is particularly concerning when the policy framework has effectively prohibited the development of any tall buildings in the Neighbourhoods over the past 40 years. Applying a blanket height cap across the City’s Neighbourhoods based on the decisions that were made 40 years ago is not good planning. Cities need to change and grow organically, creating new space for new and growing families, newcomers, and multi-generational families. We recommend removing this policy entirely as the remaining built form and urban design policies strongly protect for built form transition,

appropriate relationships, and the requirement for negative impacts from tall buildings to be mitigated.

#### **Requirement for Affordable Housing in the Mall-based Community Nodes**

The Draft 2051 Official Plan contains Policies 13.3.3.4.1 (a) and (b) which require a minimum 10 percent of housing units that are below-market for each development application proposing more than 50 residential units within the Mall-based Community Nodes. These policies were introduced in the current Official Plan (then numbered policy 14.1.7.4.1) but were appealed and found to be ultra vires of the Planning Act by the Ontario Land Tribunal. Accordingly, these policies should be removed from the 2051 Official Plan prior to adoption.

#### **Limitations on the Design of Above Grade Parking**

MOP 2051 includes some revisions to the structured parking policies of the Downtown Local Area Plan. Whereas the current in-force MOP has different expectations and treatments for A and B streets, these have been removed in the draft MOP 2051. The result is draft policy 12.2.8.21.b that would prohibit any visual presence of an integrated parking structure on any public street.

Starlight's preference is to minimize the exposure of above-grade parking structures along public frontages as opposed to mandate uses for the space and prevent the entirety of the footprint from being used for parking. There are many creative opportunities through thoughtful placement, orientation, and articulation of built form/facade to minimize the visual impact of parking. In rental tenure development in particular establishing appropriate parking provision to support tenants is key, and must be done in an efficient manner in order to support project proformas. Flexibility in layout is recommended by the following policy revision:

*12.2.8.21.b. integrated above-grade parking structures will not directly front onto public streets, but will generally be ~~entirely~~ screened by liner buildings incorporating a mix of uses between the parking structure and street space;*

#### **Site Specific Designation Comments**

It is understood that City Staff are proposing new residential land use designations that will help remove barriers and encourage more types of housing with the latest Draft MOP 2051 policies, by moving to a form-based approach. It is also understood that the proposed Official Plan policies intend to encourage the development of mid-rise buildings which are less common across much of Mississauga, to help with height transitions between low-rise and high-rise neighbourhoods.

We appreciate this opportunity to draw your attention to how the proposed down-designation of the Bloor and Silver Spear Sites from "Residential High Density" to "Residential Mid-Rise" would result in limiting the development potential for much-needed infill rental housing at these sites. In order to

maintain the applicable policy permissions these sites currently enjoy, we request that they be designated “Residential High Rise” in MOP 2051.

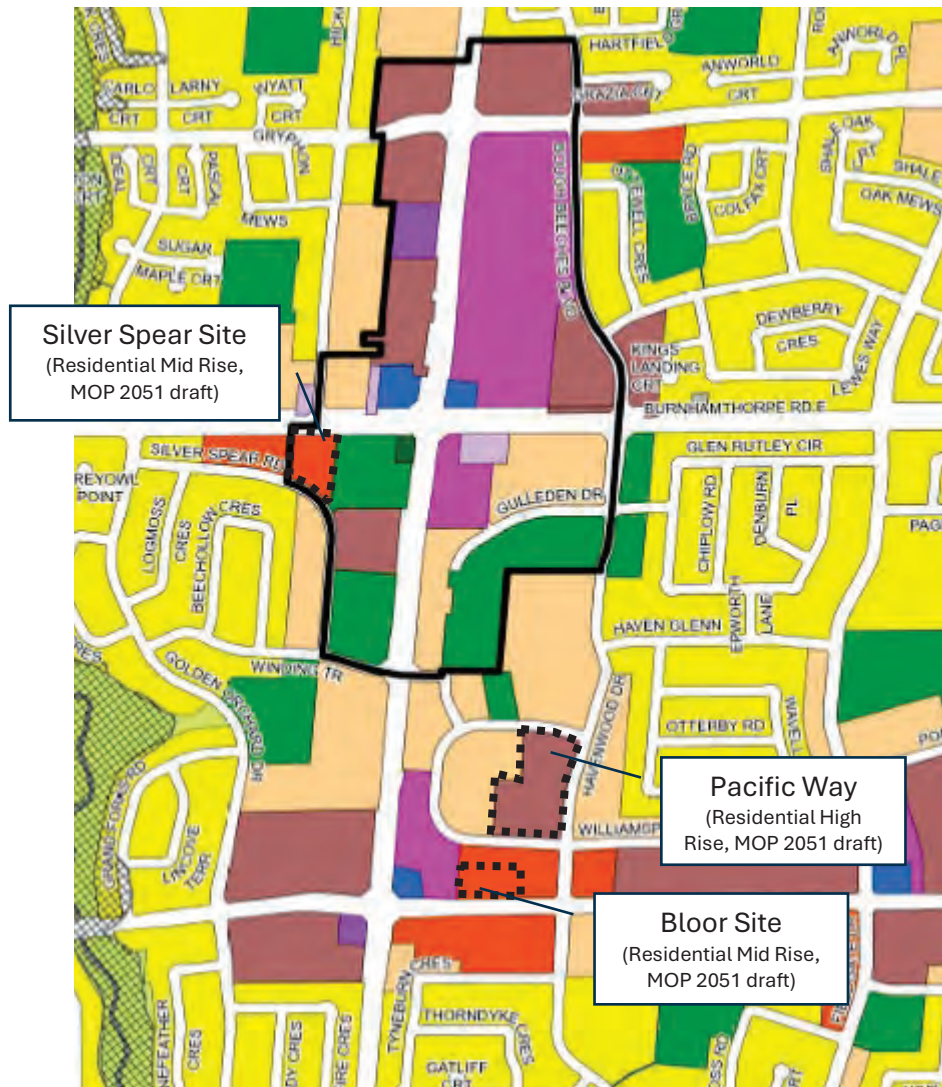


Figure 1: Starlight Sites identified on the Proposed MOP 2051 Schedule 7 Land Use Designations

### 1315 Silver Spear Road

#### *The Silver Spear Site and the Existing Planning Application*

The Silver Spear Site of approximate 0.84 hectares is located on the south side of Burnhamthorpe Road East with frontage also on the north side of Silver Spear Road. It is surrounded predominantly by a mix of residential uses in a variety of forms:

- 5-storey apartment building immediately to the west;
- Townhouse and single-family detached dwellings to the south;



- New 12-storey residential apartment to the southeast;
- The Dixie Bloor Neighbourhood Centre, Burnhamthorpe Library and Maja Prentice Theatre immediately to the east; and
- A gas station, 4 storey apartment building and 3-storey townhouses on the north side of Burnhamthorpe Road.

Currently, the Silver Spear Site is located within the Rathwood-Applewood Community Node (CN) Character Area, which the in-force Mississauga Official Plan (2021) section 14.1.7 identifies as a Mall-Based Community Node. The Site is designated “*Residential High Density*” and permits a density of 3.75 FSI (14.1.7.2.4) and a maximum height of height of up to 18 storeys (14.1.7.2.2), subject to the relevant urban design policies of the Plan. These density and height permissions were introduced through OPA 115, with policies coming into effect in March 2024.

There is an active combined OPA/ZBA application made by Starlight Developments for the Silver Spear Site that predates the approval of OPA 115, which seeks to revise the Official Plan and zoning by-law to permit a new purpose-built rental apartment building fronting onto Burnhamthorpe while retaining the existing 8 storey apartment building (Application No. OZ 18/005 W3). We are in close communication with Community Planning staff on revisions to the application that reflect the current policy framework and will bring much needed rental housing to an appropriate site through infill.

#### *The Proposed Policy Changes*

The Draft MOP 2051 proposes to change the land use designation for the Silver Spear Site from “*Residential High Density*” to “*Residential Mid-Rise*”, which could be interpreted to limit the maximum height on the Site to 12-storeys (13.3.2.3) (see discussion above), which is less than the width of the ROW (50 metres) and less than the 18 storey policy applicable today.

Accordingly, we request that: Schedule 7 of the MOP 2051 be revised to change the designation on the Silver Spear Site to “*Residential High-Rise*” to reflect the current policy framework and appropriateness of the site to support greater height..

Additionally, the following revision to Proposed Policy 13.3.2.3 would more appropriately reflect the surrounding development context and the planned width of Burnhamthorpe Road:

*13.3.2.3 Lands within the Community Nodes that are designated Residential Mid-Rise will permit buildings up to the width of the right-of-way in which is fronts upon.*

#### **1475 Bloor Street**

##### *The Bloor Site*

The Bloor Site of approximately 1.18 hectares is located on the north side of Bloor Street, one parcel east of Dixie Road and is surrounded by a mix of predominantly residential uses in a variety of forms:

- One existing apartment building ( 7 storeys) within the site;
- 6-storey apartment buildings immediately to the north and northeast;
- A 1-storey mall site with a gas station immediately to the southwest;
- Two 9-storey apartments across Williamsport Drive to the northwest;
- 3-storey townhouses to the northwest across Williamsport Drive;
- 6-storey and 8-storey apartments to the south and southwest across Bloor Street;
- Two 26-storey apartments near the intersection of Dixie Road and Bloor Street further to the southwest;
- 6-storey apartments and townhouses further to the northeast; and
- Single-family detached dwellings further to the southeast.

The Bloor Site currently has a land use designation of “*Residential High Density*” under the in-force Mississauga Official Plan (2021), and the MOP permits a density of 1.2 to 1.5 FSI. There are no active planning applications within the Bloor Site, but Starlight is contemplating the potential for purpose built rental infill building(s) greater than 7 storeys.

#### *The Proposed Policy Changes*

The Draft MOP 2051 policies of the MOP propose to change the land use designation for the Bloor Site from “*Residential High Density*” to “*Residential Mid-Rise*”.

The Bloor Site falls within the Applewood Neighbourhood Character Area under Schedule 1 of the Draft MOP 2051.

The proposed policy framework would appear to restrict the height of a building on the Bloor Site to 8-storeys (10.2.5.8), but this is further limited MOP 2051 Neighbourhoods policy 14.1.3.3, which states that,

*“New development located within Residential Mid-Rise and High-Rise designated areas and on lands not within a Protected Major Transit Station Area will not exceed the height of any existing buildings on the property, and will be further limited in height so as to form a gradual transition in massing when located adjacent to lands designated Residential Low-Rise”.*

As is discussed earlier in this letter, height caps based on historical market and policy trends do not represent good planning and should be revised or removed.

Our opinion is that while there is the intention to provide more “*Residential Mid-Rise*” buildings within the City, a “*Residential High-Rise*” designation may be more appropriate for the Bloor Site for reasons of context and feasibility:

- **CONTEXT:** The surrounding context includes several buildings greater than 8 storeys. We recognize that the existing character on some area parcels around the Bloor Site are within

the range of 6 to 8 storeys, reflecting a building scale popular (and feasible) at a different point in time. However, the intent for transition and varied scale can be created and achieved with infill buildings under the “High Rise” designation that are greater than 7 storeys. Also, the designated ROW width of Bloor Street is 30 metres under the Proposed Schedule 6, which could support a mid-rise building of up to 9-10 storeys, subject to policy requirements for transition, shadows, and built form being met. A desirable transition that steps down from the existing 26-storey tall towers to the existing 6 to 8 storey apartments, townhouses and single-family detached dwellings would be desirable for this area;

- **FEASIBILITY:** An infill development at the Bloor Site would require underground parking due to the limited available at-grade area within the site if the existing buildings are retained. Providing costly underground parking for the new building and any required replacement parking for the existing buildings becomes challenging when the new build is limited to 7 storeys of development – simply put, there is not enough GFA to recover the additional cost, especially in a rental tenure. Additional height and its resulting GFA support improved cost efficiencies that allow rental projects to proceed in a key community node at a desirable scale. Limiting heights to historic patterns driven by vastly different factors may have the opposite effect to that intended; it may create development scenarios that are not feasible such that no new infill is proposed.

Accordingly we request that Schedule 7 of the MOP 2051 be revised to change the designation on the Bloor Site to “*Residential High-Rise*” to better reflect the surrounding development context and the transition/scale of buildings, the designated ROW width of Bloor Street, the housing demands of the City/Province, and the prevailing financial feasibility factors.

### **3450 Havenwood Drive and 1485 Williamsport Drive**

#### *The Pacific Way Site*

The Pacific Way site of approximately 2.2 hectares is bounded by Williamsport Drive to the north and south, a townhouse complex to the west, and Havenwood Drive to the east. The Site is surrounded by a mix of residential, commercial and community uses in a variety of forms:

- Two existing 9-storey apartments within the site;
- A three- and four-storey townhouse complex immediately to the west;
- The Mississauga Williamsport YMCA Child Care Center is located to the north;
- The Gullenden Park townhouse complex to the north;
- A 2-storey townhouse complex to the east;
- Two 6-storey apartments to the south;
- The High Point Mall retail complex to the southwest at the intersection of Bloor Street and Dixie Road; and
- Two apartment towers (26 and 27 storeys) at the west side of the intersection of Bloor Street and Dixie Road.

The Pacific Way Site currently has a land use designation of “Residential High Density” under the in-force Mississauga Official Plan (2021), and the MOP permits a density of 0.5 to 1.2 FSI. There is an active planning application within the Pacific Way Site, and Starlight is seeking the Official Plan Amendment and Zoning By-law Amendment for an infill building of 10 storeys.

### *The Proposed Policy Changes*

While MOP 2051 has assigned a designation of Residential High Rise to the Pacific Way site, it also proposes to strengthen the language related to maximum heights being based upon the tallest building on a property, changing the existing policy (16.2.3.1) from “should not exceed the height of any existing buildings on the property, [...]”, to (14.1.3.3) “will not exceed the height of any existing buildings on the property, [...]” (emphasis added). This would limit the maximum permitted height on the Pacific Way Site to 9 storeys, which is merely 1 storey greater than the baseline Residential Mid Rise designation definition and would hamper the ability for this site, and sites like it to implement the High-Rise intent of the new OP designation. As is discussed earlier in this letter, imposing maximum height caps based on arguably random historical patterns does not represent good planning and should be revised or removed.

### Conclusion

To conclude, we have recommendations for the general policies of the Draft MOP 2051, as well as a series of site-specific designation changes that would clarify and strengthen the City's intent to support infill development and in particular the type of purpose built rental housing provided by Starlight:

#### *General Policies*

It is apparent that the City has attempted to bolster the residential mid-rise policies in the Draft MOP 2051 with the goal of developing more of this housing type. However, the outcome is that the framework has become confusing, which is compounded by the Character Area policies.

The mid-rise policies of the Plan generally refer to mid-rise buildings as being defined by, and not taller than, the right of way they front onto. However, the “*Residential Mid-Rise*” designation imposes an 8-storey cap (10.2.5.8.b) and the Community Nodes policies imposes a 12-storey cap (13.3.2.3). We believe these height limits should be reconsidered as the rights-of-way in many locations in Mississauga are wider than these heights, and can support and benefit from a proportional mid-rise form that allows for local context to be taken into account. This change will also simplify the application and comprehension of the mid-rise policies.

Policy (14.1.3.3) states that new development “*will not exceed the height of any existing buildings on the property, [...]*”. We recommend removing this policy entirely as it results in arbitrary height

limits across the Neighbourhoods, and is redundant given the remaining built form and urban design policies that require built form transition, appropriate built-form relationships, and the requirement for negative impacts from tall buildings to be mitigated.

The policies requiring affordable housing in the Mall-based Community Nodes (13.3.3.4.1 (a) and (b)) were introduced in the current Official Plan (as 14.1.7.4.1) but were appealed and found to be ultra vires of the *Planning Act* by the Tribunal. Accordingly, these policies should be removed from the 2051 Official Plan prior to adoption.

Policies requiring full screening of above grade parking (12.2.8.21.b) should be softened to recognise efficient use of floorplates to meet parking requirements.

#### *Site Specific Changes*

We request that the underlying land designation of the Silver Spear site be changed to “*Residential High-Rise*” to reflect the policy permissions applicable to the site today and its ability to appropriately accommodate greater development contributing to much needed rental housing.

We request the Bloor Site be designated “*Residential High-Rise*” in recognition of the surrounding context and the transition/scale of buildings, the designated ROW width, the housing demands of the City/Province, and the prevailing financial feasibility factors

Urban Strategies is pleased to submit this comment letter on the Mississauga Official Plan Review on behalf of Starlight Developments and looks forward to furthering discussions with the City on potential policy changes to the Starlight Sites. Thank you for considering our comments and please do not hesitate to get in touch with me directly should you have any questions regarding this comment letter.

Sincerely,

**URBAN STRATEGIES INC.**



**Emily Reisman, MCIP, RPP**  
Partner

cc: Anne Messore, Starlight Developments  
Matthew Cesta, Starlight Developments





PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

July 5, 2024

Amina Menkad, Project Lead  
Ben Phillips, Project Manager  
City of Mississauga  
official.plan@mississauga.ca

Dear Ms. Menkad and Mr. Phillips:

**RE: City of Mississauga Draft Official Plan 2051**  
**Comments Re: 2657 Dundas Street West**  
**OUR FILE 213021**

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We are writing on behalf of our client, 2814690 ONTARIO INC., the registered owner of 2657 Dundas Street West in the City of Mississauga (the 'subject lands'). The subject lands are located on the north side of Dundas Street West, east of Winston Churchill Boulevard and west of Erin Mills Parkway. The subject lands have an approximate area of 17,078.34 square metres and are presently developed with a single storey commercial building and a large surface parking lot. The subject lands have direct access to Dundas Street as well as a second, shared access with the property to the east.

The surrounding land uses include low-rise residential to the south (on the opposite side of Dundas Street), and commercial uses to the east, west and north. The site is separated from commercial development to the north by a natural corridor containing a watercourse. The subject lands are located along an existing transit route and are well connected to the Provincial Highway system, with Highway 403 located a short distance to the west. The subject lands are in close proximity to multi-use trails and cycling routes located along Erin Mills Parkway and Winston Churchill Boulevard, south of Dundas.

The Region's Official Plan identifies the subject lands as being within a **"Primary Major Transit Station Area"** located along a "Major Road". The Region's OP directs the vast majority of new population and employment growth to lands within the Delineated Built-Up Area with a focus on Strategic Growth Areas. Primary Major Transit Station Areas are intended to develop with transit supportive densities. **The subject lands as currently developed are underutilized given the location within a Primary Major Transit Station Area.** The subject lands are located outside of the Provincially Significant Employment Zone to the north.

We have reviewed the draft Official Plan as it relates to these lands and confirm our understanding that the Draft Official Plan, in part, will bring the plan into conformity with the Region's Official Plan.

The Draft City Structure Plan (Schedule 1) identifies the subject lands as being within a Strategic Growth Area, and specifically within a "Major Transit Station Area" (MTSA). The subject lands are also identified as being with a 'Neighbourhood' (NHD) on Schedule 1. MTSA's are intended to provide for future growth with transit supportive development. The Official Plan confirms that all MTSA's identified on Schedule 1 are considered Protected Major Transit Station Areas (PMTSA) per Provincial Policy. The Draft Official Plan provides extensive policies for lands within the MTSA's, including policies specific to the Dundas Street corridor. **We acknowledge and support the inclusion of the subject lands within a PMTSA.**

The Draft Official Plan sets out minimum and maximum building heights within the MTSA's. For the subject lands the height range is 2-12 storeys. **In our opinion this does not represent an appropriate building height within a PMTSA.** By restricting height to only 12 storeys, it will be extremely challenging, if not impossible, to make redevelopment of the subject lands, and surrounding area, financially feasible. This statement considers the escalating land and construction costs, and the current challenges in the market with high interest rate. High-rise, mixed-use development is the most expensive form of housing to construct. By limiting height, and as a result, limiting unit yield, the unintended consequence is a further escalation in the cost of housing.

**Building heights should be increased to more appropriately reflect the MTSA designations, or alternatively building heights be removed from the Official Plan and implemented through zoning. At a minimum that the Official Plan should provide criteria to be satisfied in order to support increased building height.**

Our client is actively working on concept plans for the site and will be coming in for a Pre-Consultation meeting in the near future. We are confident that the site can accommodate a mixed-use building at a significantly increased height, without adverse impact to surrounding uses. We would be happy to share concept plans for the site once available.

We would appreciate the opportunity to meet with the Official Plan review team to discuss these comments in further detail. In the meantime, kindly acknowledge receipt of these comments and confirm that they will included in the public record.

Yours truly,  
**MHBC**

A handwritten signature in black ink, appearing to read "Andrea Sinclair", with a long horizontal flourish extending to the right.

Andrea Sinclair, MUDS, MCIP, RPP

City of Mississauga  
300 City Centre Drive  
Mississauga, ON  
L5B 3C1

September 6, 2024  
File 11993

**Re:            *Participation in the City of Mississauga's Official Plan Review Process***  
***5711 Atlantic Drive***

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Weston Consulting is the Planning Consultant for Atlantic Packaging, the registered owner of the property municipally addressed as 5711 Atlantic Drive in the City of Mississauga (the "AP Lands"). Atlantic Packaging currently operates a box plant facility on the AP Lands.

We understand that the City of Mississauga is currently undertaking an Official Plan Review ("OPR") process. Given that the AP Lands are located within the City of Mississauga, Atlantic Packaging has an interest in monitoring and participating in the ongoing OPR process. We request to be notified on behalf of Atlantic Packaging of the release of any draft policies, meetings, reports, and/or decisions as it relates to the OPR process.

As such, we kindly request that Weston Consulting c/o the undersigned be added to the notification list for this matter. We reserve the right to provide further comments on behalf of Atlantic Packaging as it relates to this matter.

Please contact us if there are any questions.

Yours Truly,  
**Weston Consulting**

**Per:**



Ryan Guetter, BES, MCIP, RPP  
Executive Vice President  
[rguetter@westonconsulting.com](mailto:rguetter@westonconsulting.com)  
Ext. 241



Jessica Damaren, BES, MCIP, RPP  
Lead Planner, Special Projects  
[jdamaren@westonconsulting.com](mailto:jdamaren@westonconsulting.com)  
Ext. 280

cc.     Atlantic Packaging

## Taranjeet Uppal

---

**From:** Lingard, Norman <norman.lingard@bell.ca>  
**Sent:** Thursday, June 20, 2024 2:55 PM  
**To:** Official Plan  
**Subject:** [EXTERNAL] Draft Mississauga Official Plan

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Good afternoon,

Bell Canada thanks you for the opportunity to participate in the City of Mississauga's Official Plan process. It is our understanding that the new Official Plan will guide future growth and development in the City to 2051.

### About Bell Canada

Bell Canada is Ontario's principal telecommunications infrastructure provider, developing and maintaining an essential public service. The *Bell Canada Act*, a federal statute, requires that Bell supply, manage and operate most of the trunk telecommunications system in Ontario. Bell is therefore also responsible for the infrastructure that supports most 911 emergency services in the Province. The critical nature of Bell's services is declared in the *Bell Canada Act* to be "for the general advantage of Canada" and the *Telecommunications Act* affirms that the services of telecommunications providers are "essential in the maintenance of Canada's identity and sovereignty."

Provincial policy further indicates the economic and social functions of telecommunications systems and emphasizes the importance of delivering cost-effective and efficient services:

- The 2020 Provincial Policy Statement (PPS) requires the development of coordinated, efficient and cost-effective infrastructure, including telecommunications systems (Section 1.6.1).
- Section 1.7.1 I) of the 2020 PPS recognizes that "efficient and coordinated telecommunications infrastructure" is a component of supporting long-term economic prosperity.
- We note that the definition of infrastructure in the 2020 PPS is inclusive of communications / telecommunications, which is indicative of the importance in providing efficient telecommunications services to support current needs and future growth (Section 1.6.1).
- Furthermore, the 2020 PPS states that infrastructure should be "strategically located to support the effective and efficient delivery of emergency management services" (Section 1.6.4), which is relevant to telecommunications since it is an integral component of the 911 emergency service.

To support the intent of the *Bell Canada Act* and *Telecommunications Act* and ensure consistency with Provincial policy, Bell Canada has become increasingly involved in municipal policy and infrastructure initiatives. We strive to ensure that a partnership be established which allows for a solid understanding of the parameters of Bell's infrastructure and provisioning needs and the goals and objectives of the municipality related to utilities. For example, balancing the technical demands of providing reliable service to the public with the desire to create an aesthetically pleasing environment.

### Comments on the Draft Official Plan

Bell Canada is most interested in changes to the transportation network and/or policies and regulations relating to the direction of population growth and public infrastructure investments, heritage character, urban design, broadband and economic development related objectives and how Bell can assist Mississauga to be a

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connected community. We have reviewed the above noted document, and are appreciative of the City's support in promoting and facilitating telecommunications throughout the document, Bell looks forward to Mississauga's support of the provision and expansion of reliable wireline and wireless infrastructure as a critical component to support the community, new development and the local economy as per Section 9.1.7 - Supporting Jobs and Businesses.

To facilitate the provisioning of this infrastructure, we appreciate the City's continued support in ensuring that sufficient notice and time to comment on planning applications are provided, particularly for Draft Plan of Condominium, Draft Plan of Subdivision and Site Plan Control/Approval. This ensures an understanding by applicants of Bell's conditions and provisioning requirements.

Bell would also emphasize that receiving engineering and servicing/utility plans/drawings, as soon as possible in the process, assists in the development and expedition of our provisioning plan. As a result, we would strongly recommend that this consideration be highlighted in any pre-circulation/consultation meetings with prospective applicants. This will assist Bell in providing comments and clearance letters in an efficient manner, assisting the City of Mississauga in meeting approval times. Such drawings should be submitted to: [planninganddevelopment@bell.ca](mailto:planninganddevelopment@bell.ca) by the applicant/their agents.

Having become increasingly involved in municipal infrastructure initiatives, Bell Canada understands the desire to support high quality urban design through built form to enhance the appearance and livability of its urban areas and strive to minimize the impact of our infrastructure. However with the evolving nature of telecommunication/communication technology it is not always possible for a number of reasons, for example, the way the infrastructure is intended to be serviced in emergency situations. We strive to ensure that a partnership be established which allows for a solid understanding of the parameters of Bell's infrastructure and provisioning needs and the goals and objectives of the municipality related to utilities, and appreciate the opportunity to work with the City to find solutions that align as much as possible with the municipality's urban design interests in principle, where feasible.

### Future Involvement

We would like to thank you again for the opportunity to comment, and request that Bell continue to be circulated on any future materials and/or decisions released by the City in relation to this initiative. Please forward all future documents to [circulations@wsp.com](mailto:circulations@wsp.com) and should you have any specific questions, please contact the undersigned.

Yours truly,

Norm Lingard  
Senior Consultant – Municipal Liaison  
Network Provisioning  
[norman.lingard@bell.ca](mailto:norman.lingard@bell.ca) | ☎ 365.440.7617



*Please note that WSP operates Bell Canada's development, infrastructure and policy tracking systems, which includes the intake and processing of municipal circulations. However, all responses to circulations and requests for information will come directly from Bell Canada, and not from WSP. WSP is not responsible for the provision of comments or other responses.*

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**Infrastructure  
Ontario**

December 19, 2024

Ms. Amina Menkad  
Project Lead, Official Plan Review  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

**RE: Infrastructure Ontario Comments on Mississauga Official Plan Review**

Dear Ms. Menkad:

Thank you for the opportunity to provide comments on the City of Mississauga Official Plan Review.

Infrastructure Ontario (IO) is a Crown Agency responsible for the strategic management of the provincial realty portfolio on behalf of the Ministry of Infrastructure (MOI). Part of IO's mandate is to protect and optimize the value of the Province's real estate portfolio, while ensuring real estate decisions reflect public policy objectives

IO manages several parcels of land in the City of Mississauga and wishes to provide comments on a specific parcel located at the southwest corner of Highway #403 and Eglinton Avenue East (PIN 131800295 – see Appendix A).

This property currently accommodates a golf facility (Bathgate Golf Centre) and a large portion is also vacant. The property is subject to the Parkway Belt West Plan but also subject to a Minister's Zoning Order (Ontario Regulation 448/20) that adds long-term care and residential uses to already permitted uses in the Parkway Belt zone (PB2-1).

IO kindly requests that the Official Plan reflect MZO permissions for this property, either through a site-specific exemption or an overlay designation.

Thank you in advance for considering our comments. IO requests to be notified of all future Official Plan Review updates, including any revisions to draft policies or schedules. Please contact us if you have any questions.

Yours sincerely,

A handwritten signature in red ink that reads "Michael Coakley".

Michael Coakley  
Senior Planner, Land Use Planning  
Portfolio Planning and Pre-Construction Services

Direct Tel. #: (647) 264-3588 or (416) 806-9025

../2

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6.5



**Infrastructure  
Ontario**

cc: Andrew Whittemore, Commissioner of Planning and Building, City of Mississauga  
Ben Phillips, Project Manager, Official Plan Review, City of Mississauga  
Amy Emm, Infrastructure Ontario  
Joanna Craig, Infrastructure Ontario

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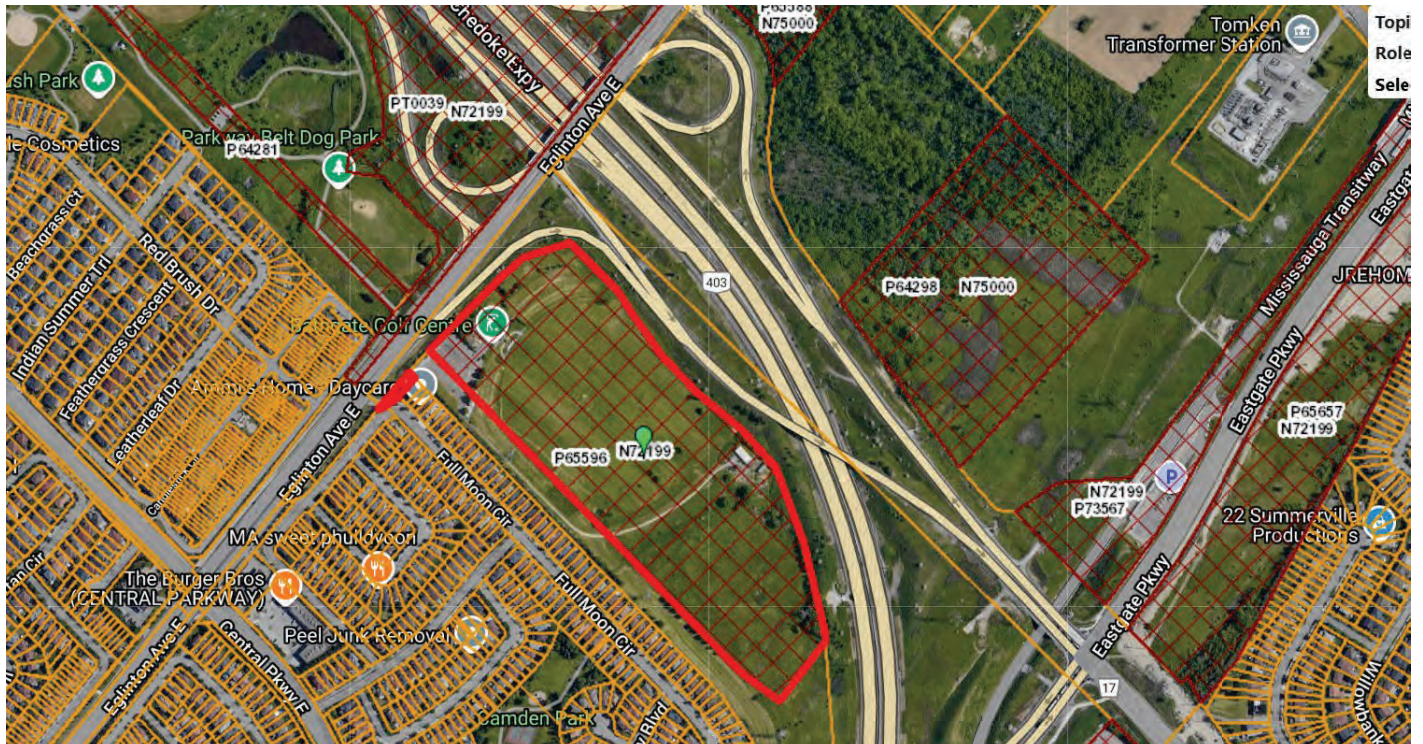
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**Infrastructure  
Ontario**

## Appendix A

### Andy Bathgate Property (Red Outlined Area)



**Taranjeet Uppal**

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**From:** Aubrey Iwaniw <Aubrey.Iwaniw@metrolinx.com>  
**Sent:** Thursday, June 27, 2024 4:56 PM  
**To:** Official Plan  
**Subject:** [EXTERNAL] Comment on Official Plan 2051!

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Hi there,

Stations Planning at Metrolinx would like to facilitate more placemaking at the GO Stations. In some cases, there are opportunities we are exploring that are prohibited by the current zoning and permitted uses. We request that all GO Station lands in the City of Mississauga be zoned "Mixed Use" and permit for larger, primary office space in addition to secondary office.

Best of luck!

~Aubrey

**Aubrey Iwaniw** *(she/her)*

Senior Manager, Stations Planning, METROLINX

(416) 202-5563 | 97 Front Street West | Toronto | Ontario | M5J 1E6

**Read about the future of GO Rail Station Access [here!](#)**



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