

Draft Mississauga Official Plan 2051 – Response to Comments Matrix

| List of Acronyms | | | | | |
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| ARU | Additional Residential Unit | MTSA | Major Transit Station Area | PPS | Provincial Planning 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 | | |

| # | Respondent | Comment | OP Staff Response |
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| 1 | Letter from Davis Howe for Kaneff_2300 Confederation Pkwy | Concerns over exclusion from height increases in schedules 8L | <ul style="list-style-type: none">- As part of MOP 2051, the review of MTSA heights was undertaken to determine if there was planning merit for height increases based on criteria. This evaluation resulted in changes that allow higher heights mostly for areas adjacent to higher order transit corridors or stations. It is necessary as heights are examined to ensure proper transition outward from the highest heights to adjacent neighbourhoods.- Additional height can be achieved without amendment to the plan through policies compensating for IZ units and above-ground commercial uses.- At this time, it has been determined that the height within the subject site is appropriate as the PMTSA still meets the minimum density required and the height allows proper transition to the adjacent neighbourhood. |
| 2 | Letter from Davies Howe for Kaneff_2170 Sherobee Rd | Concerns over exclusion from height increases in schedules 8L (request increase from 25 storeys to 35 storeys) | <ul style="list-style-type: none">- As part of MOP 2051, the review of MTSA heights was undertaken to determine if there was planning merit for height increases based on criteria. This evaluation resulted in changes that allow higher heights mostly for areas adjacent to higher order transit corridors or stations. It is necessary as heights are examined to ensure proper transition outward from the highest heights to adjacent neighbourhoods.- Additional height can be achieved without amendment to the plan through policies compensating for IZ units and above-ground commercial uses.- At this time, it has been determined that the height within the subject site is appropriate as the PMTSA still meets the minimum density required and the height allows proper transition to the adjacent neighbourhood. |
| 3 | Letter from MHBC for TCPL | Revisions to pipeline policies in Section 18.19 -Infrastructure and Utilities | <ul style="list-style-type: none">- Policy have been updated as appropriate. |
| 4 | Letter from Trillium Health Partners for Mississauga Hospital | Concerns over heights and conflicts with heliport | <ul style="list-style-type: none">- Policy 13.6.5.1 was updated to indicate that Trillium Health Partners will be circulated on development proposals within the vicinity of the Mississauga Hospital and that any proposed buildings should not interfere with or conflict with the functioning of the hospital heliport. This may result in building heights that are lower than maximums otherwise permitted by the Plan. |
| 5 | Email from Biglieri Group_5060 & 5150 Spectrum Way | Requesting clarification related to the land use permissions for the properties | <ul style="list-style-type: none">- A meeting with the Biglieri Group and Landowners was held on February 10, 2025 where the extent of the Special Site #1 area was clarified along with the permitted uses within the Business Employment designation as it relates to this property. |
| 6 | Email from CN Rail | Request the addition of and strengthening of policies related to railway operations, specifically regarding developments in proximity to existing rail facilities. | <ul style="list-style-type: none">- Definitions are in the PPS and can be found in the Glossary- Concerns already addressed through policies (please see policies 4.13.4.3, 7.2.4 and 4.5.4.7) |
| 7 | Letter from MGP on behalf of 325 Burnhamthorpe Rd W | Request the maps in Chapter 12 reflect OPA 161 | <ul style="list-style-type: none">- Maps have been updated to reflect MOPA 161 |
| 8 | Letter from Goodmans on behalf of First South Common | Affordable housing policies (14.2.11.5.1 and 14.2.11.5.3 to 14.2.11.5.6 and 14.2.6.10.7) are beyond the City’s jurisdiction according to OPA 115 and should be removed. If 14.2.6.10.7 is not removed, the FSI should be updated to 3.75 FSI as per policy 14.2.11.3.4 | <ul style="list-style-type: none">- The City has been granted leave to appeal the OLT Decision to Divisional Court, and will be seeking a stay of the OLT Decision. The new OP will reflect the outcome of the Divisional Court proceedings- Changes to reflect tribunal decision have been incorporated into the new OP |
| 9 | Letter from Goodmans on behalf of First Capital Meadowvale | Affordable housing policies (14.2.11.5.1 and 14.2.11.5.3 to 14.2.11.5.6 and 14.2.6.10.7) are beyond the City’s jurisdiction according to OPA 115 and should be removed. If 14.2.6.10.7 is not removed, the FSI should be updated to 3.75 FSI as per policy 14.2.11.3.4 | <ul style="list-style-type: none">- See response to Letter #8 |

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| 10 | Letter from Weston Consulting on behalf of 5787 Hurontario | Request to be kept informed of the Official Plan Review process | - Noted, email has been added to the circulation list |
| 11 | Letter from Weston Consulting on behalf of 6035 Creditview Rd | Request lands be redesignated from Motor Vehicle Commercial to Mixed Use and request to be kept informed of the Official Plan Review process. | - It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. - Noted, email has been added to the circulation list |
| 12 | Letter from Weston Consulting on behalf of 796 Burnhamthorpe Rd. W | Request removal of property from Mavis-Erindale Employment Area and redesignation to Mixed Use and request to be kept informed of the Official Plan Review process. | - The use is considered a lawfully established under the provisions of the <i>Planning Act</i> . A change in designations needs to occur through a request to remove the lands from the Employment Areas in accordance with the PPS 2024. - Noted, email has been added to the circulation list |
| 13 | Letter from Bousfields on behalf of Rangeview Estates Lands | A list of changes related to the Rangeview development – please see letter #13 | - 10.2.6.3 is a city-wide policy and is required to ensure sufficient and viable retail is preserved. - 10.2.6.5 changed - 14.2.4.10 revised - 14.2.4.10.3 revised - The new OP will reflect the OPA 24-11 W1 amendments once approved. - This is better suited to be addressed through the development approval process. - Sections 13: This is generally understood throughout the OP as per 1.3.e |
| 14 | Letter from Beedie | - Chapter 4 (policies 4.3.2.22, 4.3.2.19, and 4.3.2.21) questions regarding woodland and natural heritage area ecological requirements - Employment Area land retention metrics (policy 16.3.3) | - Noted, the policies ensure protection continues to apply to these sensitive features. Site specific studies can provide additional information on the state and the health of these features as well as additional needed measures. - The removal of lands from employment areas is subject to PPS 2024 criteria. The City will determine the adequate metrics to use, including land needs assessments and growth forecasts as well as city developed plans outlining its growth strategies. |
| 15 | Letter from Erin Mills South Residents Association regarding 4099 Erin Mills (52 letters of similar concern regarding these policies were also received from members of the public) | Request that policy 10.2.6.3 (a) be deleted and policy 11.3.2 be restored from the February 2024 draft version of the Official Plan | - Policy 11.3.2 has been deleted as it was not clear/specific enough to ensure an adequate amount of non-residential space is preserved after redevelopment. Instead, policy 10.2.6.3 has been introduced to provide certainty on that front. This new policy strikes a balance between the need for non-residential uses (like retail) and the need for additional housing in the City. The certainty that this policy brings helps ensure future development provides much needed services and retail to current and future residents. It works as well to ensure these communities are walkable by providing local destinations within the community. These policies do not currently exist in the in-force plan. - 10.2.6.3 in its January 2025 version does provide for a balance between increasing housing throughout the City and providing space that is large enough for meaningful and supportive retail and commercial activities, depending on the site's area and density. New building and parking requirements throughout the City have changed since the time these plazas have been created. They are less space-intensive than before which provides for more mix of uses within a smaller space. Hence the new policy language. |
| 16 | Letter from Weston Consulting on behalf of 2025-2087 Dundas St E | Request that the subject property be removed from the Dixie Employment Area on the draft Schedule 1 and redesignated from Mixed Employment to Mixed Use Limited on Schedules 7 and 7K, and 8g (PMTSA). | - Meeting scheduled with Weston Consulting on March 7, 2025 regarding the potential for removal of the lands from the Dixie Employment Area and the process to do that given the Dixie EA Special Site. It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. |
| 17 | Letter from Kaneff | Multiple properties: • 2170 Sherobee Road and 2300 Confederation Parkway - Request that Schedule 8l be modified to increase the maximum building height for the subject lands from 25 to 35 storeys or more to support the increase in supply of housing within these PMTSAs. • 49-87 Matheson Blvd East | - As part of MOP 2051, the review of MTSA heights was undertaken to determine if there was planning merit for height increases based on criteria. This evaluation resulted in changes that allow higher heights mostly for areas adjacent to higher order transit corridors or stations. It is necessary as heights are examined to ensure proper transition outward from the highest heights to adjacent neighbourhoods. Additional height can be achieved without amendment to the plan through policies compensating for IZ units and above-ground commercial uses. At this time, it has been determined that the height within the subject |

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| | | <ul style="list-style-type: none"> - Remove the lands from the Gateway Corporate Centre Employment Area and designated “Mixed Use Limited” for a few reasons outlined in the letter. • 25 Milverton Drive & 5770 Hurontario St. <ul style="list-style-type: none"> - Request that policy 16.10.2 be removed from the new draft Official Plan as in their opinion it does not conform with the <i>Planning Act</i> and the <i>PPS, 2024</i> definition of Area of Employment. - Request that Special Policy Area mapping for Site #66 be revised to also include the lands at 5770 Hurontario St to recognize existing land use permissions for the site. - Request that policy 10.2.6.6 be modified to permit mid-rise buildings up to 12 storeys in height without the need to provide additional non-residential gross floor area beyond the ground floor. • Fairview, Cooksville and Hospital Urban Growth Centre <ul style="list-style-type: none"> - Request that the reference to 45-degree angular planes be removed and a new transition policy be introduced that would standardize setback requirements for new tall buildings with the PMTSAs. - Request that the City consider reducing the minimum tower separation from 30 metres to 25 metres. References made to be consistent with the City of Toronto’s Tall Building Guidelines and the City of Brampton’s Urban Design Guidelines. | <p>site is appropriate as the PMTSA still meets the minimum density required and the height allows proper transition to the adjacent neighbourhood.</p> <ul style="list-style-type: none"> - The use is considered a lawfully established use under the provisions of the <i>Planning Act</i>. A change in designations needs to occur through a request to remove the lands from the Employment Areas in accordance with the PPS 2024. - Noted, Employment Area policies, including 16.10.2, have been updated to better align with the PPS 2024 and the definition of Areas of Employment in the Planning Act. Despite being designated “Business Employment” these lands are along a Major Transit Corridor and such should be dedicated to Transit-Supportive employment uses. - As noted in the comment, language used in the policy is flexible and allows for variations based on site specificities better understood during the development stage. |
| 18 | Letter from Canada Lands Company regarding 1 Port St E | Intend to submit additional comments before the Statutory Public Meeting in Spring 2025. | This comment has been noted. |
| 19 | Letter from Weston Consulting on behalf of 79 Dundas St W and 84 Agnes St | Request that 79 Dundas St W be redesignated to “Residential High Density” similar to the adjacent lands at 3009 Novar Rd which is under construction for an 18-storey mixed-use apartment building. | <ul style="list-style-type: none"> - As part of MOP 2051, the review of MTSA heights was undertaken to determine if there was planning merit for height increases based on criteria. This evaluation resulted in changes that allow higher heights mostly for areas adjacent to higher order transit corridors or stations. It is necessary as heights are examined to ensure proper transition outward from the highest heights to adjacent neighbourhoods. - Additional height can be achieved without amendment to the plan through policies compensating for IZ units and above-ground commercial uses. - It is not within the scope of the OP review to redesignate properties. Redesignation requires specific studies that inform the land use designation change at the property level. |
| 20 | Letter from GSAI on behalf of Queenscorp Group Inc. (4099 Erin Mills Parkway) | <ul style="list-style-type: none"> • Chapter 4: Sustaining the Natural Environment <ul style="list-style-type: none"> - Request that policy 4.2.2 regarding aiming to achieve net zero emissions be removed as it adds barriers to development reaching final/design implementation stages. • Chapter 8: Well Designed Healthy Communities <ul style="list-style-type: none"> - Request that policy definition of a mid-rise building be modified to provide as much flexibility as possible which could involve the removal of reference to right-of-way widths. - Policy 8.6.2.11 is concerning because it is not clear what “compatibility” means to the City. - Request that policy 8.4.5.2 in relation to POPS be modified to remove reference to a City Standard and adherence to same. • Chapter 10: Land Use Designations <ul style="list-style-type: none"> - Request removal of policy 10.2.6.3 or clearly specify when replacement GFA is to be required and to provide a policy mechanism that references the need to submit a Market Needs Analysis to the satisfaction of the City. | <ul style="list-style-type: none"> - The language does not require buildings to achieve near net zero but underlines the City’s support of such an objective. The City is working on developing ways to support sustainability through the Climate Change Action Plan. - 8.4.5.2 - Noted, these policies have been significantly changed to provide for a more flexible language. - Policy offers a percentage that varies according to the intensity of existing retail. Protecting existing retail and providing a walkable destination is important in maintaining complete communities. |
| 21 | Letter from GSAI on behalf of Erin Mills Town Centre | <ul style="list-style-type: none"> - Request that Table 5.1 and policy 5.2.4 be modified to reflect the City-wide scale and to reflect that affordable housing units cannot be mandated on properties outside of an Inclusionary Zoning Area. - Request that policy 5.2.3 be modified to encourage a reduced percentage of family-sized units or remove this policy. | <ul style="list-style-type: none"> - Table 5.1 deleted. Policy amended to respond to MMAH comments related to PPS consistency with providing a target city-wide for affordable housing. - Noted, language uses encouragement. - Figure 8.9 depicting a 45 angular plane has been deleted |

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| | | <ul style="list-style-type: none"> - Concern with urban design policies in Chapter 8, specifically policies 8.2.9 c), 8.6.2.5, 8.6.2.6, Figure 8.9, and open space policy 8.4.5.2 in relation to POPS. - Concerns with policies 10.2.6.3, 10.2.6.4, and 10.6.2.5 in relation to GFA to either remove the policy or alternative wording be included to provide clarity. - Request that policy 14.1.1.3 be amended to remove “will not be supported” to allow for flexibility. Policies 14.2.1.5, 14.2.1.6.1, 14.2.1.3.1, 14.2.1.3.2, 14.2.1.5, and 14.2.1.8.2 should either be removed or modified. | <ul style="list-style-type: none"> - Policy offers a percentage that varies according to the intensity of existing retail. Protecting existing retail and providing a walkable destination is important in maintaining complete communities - Noted, policies guide the future development of the Node in accordance with the Council approved vision. |
| 22 | Letter from GSAI on behalf of Vrancor_3670 Hurontario | <ul style="list-style-type: none"> - Object to the inclusion of policy 7.3.2 as it is too general and doesn’t consider existing site constraints, existing buildings and existing buildings on the opposite side of abutting roads. - Concerns with policies 8.4.1.17, 8.4.5.2 and 8.6.2.5. - Concerns with policies 12.5.2-12.5.6 as imposing employment minimums, quotas or thresholds are unnecessarily restrictive and should be addressed on a site-specific basis. - Concerns with Maps 12-2.2, 12-2.6, 13-3.2, Figure 12.3. | <ul style="list-style-type: none"> - This is a necessary city-wide policy that would be interpreted in accordance with the local context during the application approval process. - Noted, language is qualitative and to ensure built form is up to the City’s standards. - The Downtown is the primary area for employment growth and needs to maintain a job density as a PMTSA. - Noted |
| 23 | Letter from GTAA | Support for additions to Chapter 4 regarding noise and warning clauses. Request for additional policies to Chapter 7. | <ul style="list-style-type: none"> - Proposed additional policies are already included in Chapter 17 – Special Site 74. |
| 24 | Letter from GSAI on behalf of 2105, 2087, 2097, 2207 Royal Windsor Dr | Request the redesignation of the subject lands to Mixed Use with residential permissions. | <ul style="list-style-type: none"> - It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. |
| 25 | Letter from GSAI on behalf of Moldenhauer | Request the inclusion of the lands within the Clarkson GO Primary Major Transit Station Area boundary and to redesignate the lands to “Mixed Use”. | <ul style="list-style-type: none"> - It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. |
| 26 | Letter from GSAI on behalf of RioCan Clarkson Inc. | Request the redesignation of the lands to permit a mix of uses including residential permissions. | <ul style="list-style-type: none"> - It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. |
| 27 | Letter from GSAI on behalf of CPD Developments (1425 Dundas St E) | <ul style="list-style-type: none"> - Request that policy 4.2.2 regarding aiming to achieve net zero emissions be removed as it adds barriers to development reaching final/design implementation stages. - Request that policy 5.2.3 be modified to encourage a reduced percentage of family-sized units or remove this policy. - Request that policy 8.4.5.2 in relation to POPS be modified to remove reference to a City Standard and adherence to same. - Request removal of policy 10.2.6.3 or clearly specify when replacement GFA is to be required and to provide a policy mechanism that references the need to submit a Market Needs Analysis to the satisfaction of the City. | <ul style="list-style-type: none"> - The language does not require buildings to achieve near net zero but underlines the City’s support of such an objective. The City is working on developing ways to support sustainability through the Climate Change Action Plan. - Noted, language uses encouragement. - Noted, language is qualitative and to ensure built form is up to the City’s standards. - Policy offers a percentage that varies according to the intensity of existing retail. Protecting existing retail and providing a walkable destination is important in maintaining complete communities |
| 28 | Letter from GWD on behalf of 3150 and 3170 Golden Orchard Dr | <ul style="list-style-type: none"> - Chapter 8 – 8.3.11, 8.6.4.1, 8.6.4.2 and Chapter 11 – 11.3.5.2.b., 11.5.3 policies should be updated to encourage best practices which should then be applied on site-specific basis. - Policy 11.3.3.2 criteria is overly restrictive, vague, and unclear. - Schedule 8g PMTSA – building heights shown as 2-18 storeys, request to increase to 2-25 storeys | <ul style="list-style-type: none"> - Suggestion noted and the best practices are better suited to be addressed through the development approval process. - The criteria in policy 11.3.3.2 will be applied and assessed on a site-specific basis to when an Official Plan Amendment application is initiated. - As part of MOP 2051, the review of MTSA heights was undertaken to determine if there was planning merit for height increases based on criteria. This evaluation resulted in changes that allow higher heights mostly for areas adjacent to higher order transit corridors or stations. It is necessary as heights are examined to ensure proper transition outward from the highest heights to adjacent neighbourhoods. Additional height can be achieved without amendment to the plan through policies compensating for IZ units and above-ground commercial uses. At this time, it has been determined that the height within the subject site is appropriate as the PMTSA still meets the minimum density required and the height allows proper transition to the adjacent neighbourhood. |
| 29 | Letter from Ahmed Group | <ul style="list-style-type: none"> - Figure 3.2 – do not agree with the exclusion of high-rise buildings in Neighbourhoods as it is a limitation to address the housing demand. | <ul style="list-style-type: none"> - Figures are only in the OP for illustration, they do not constitute part of the policy. - Policy speaks to opportunities, not restrictions. |

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| | | <ul style="list-style-type: none"> - Policy 8.3.14 – is overly restrictive to require the incorporation of heritage resources into all developments. - Policy 8.6.1.8 – the 30m separation distance between buildings is rigid and does not account for the urban context. - Policy 8.4.1.17 – too rigid to require built form relation to the width of the street right-of-way. | <ul style="list-style-type: none"> - Noted, these policies have been significantly changed to provide for a more flexible language. - Language is flexible and allows variation during the approval process. |
| 30 | Letter from GSAI on behalf of 2896 Battleford Rd | <ul style="list-style-type: none"> - Chapter 11- want to ensure in effect policy framework for “Residential-High Density” is carried forward - Chapter 8 (policies 8.2.9.c), 8.6.2.5, 8.6.2.6 and Figure 8.9)- concerns regarding angular plane requirements and transition policies | <ul style="list-style-type: none"> - Noted - Figure 8.9 depicting a 45 angular plane has been deleted |
| 31 | Letter from GSAI on behalf of 201 City Centre Dr | <ul style="list-style-type: none"> - Chapter 8 (policies 8.2.9.c), 8.6.2.5, 8.6.2.6 and Figure 8.9)- concerns regarding angular plane requirements, urban design requirements and transition policies | <ul style="list-style-type: none"> - Noted, Figure 8.9 depicting a 45 angular plane has been deleted |
| 32 | Letter from GSAI on behalf of 1477 - 1547 Mississauga Valleys Blvd | <ul style="list-style-type: none"> - Chapter 8 (policies 8.2.9.c), 8.6.2.5, 8.6.2.6 and Figure 8.9)- concerns regarding angular plane requirements, urban design requirements and transition policies - Schedule 8 – request height permissions be increased to 35 storeys | <ul style="list-style-type: none"> - Noted, Figure 8.9 depicting a 45 angular plane has been deleted - As part of MOP 2051, the review of MTSA heights was undertaken to determine if there was planning merit for height increases based on criteria. This evaluation resulted in changes that allow higher heights mostly for areas adjacent to higher order transit corridors or stations. It is necessary as heights are examined to ensure proper transition outward from the highest heights to adjacent neighbourhoods. Additional height can be achieved without amendment to the plan through policies compensating for IZ units and above-ground commercial uses. |
| 33 | Letter from GSAI on behalf of 1891 Rathburn Rd E | <ul style="list-style-type: none"> - Chapter 3 (3.3) and Schedule 1- request greater flexibility in permitted heights in Neighbourhoods - Chapter 5 (policies 5.2.3, 5.2.4 and Table 5.1) – concerns regarding restrictiveness of affordable housing policies - Chapter 8 (policies 8.6.1, 8.2.9.c), 8.6.2.5, 8.6.2.6 and Figure 8.9) – concerns regarding limitations of mid-rise and high-rise buildings, angular plane requirements and transition policies - Request that policy 8.4.5.2 in relation to POPS be modified to remove reference to a City Standard and adherence to same. - Chapter 10- Request removal of policy 10.2.6.3 or clearly specify when replacement GFA is to be required and to provide a policy mechanism that references the need to submit a Market Needs Analysis to the satisfaction of the City. | <ul style="list-style-type: none"> - Better examined through the approval process. - Table 5.1 deleted. Policy amended to respond to MMAH comments related to PPS consistency with providing a target city-wide for affordable housing. - Noted, Figure 8.9 depicting a 45 angular plane has been deleted - 8.4.5.2 - Noted, language is qualitative and to ensure built form is up to the City’s standards. - Policy offers a percentage that varies according to the intensity of existing retail. Protecting existing retail and providing a walkable destination is important in maintaining complete communities |
| 34 | Letter from GSAI on behalf of 3085 Hurontario St | <ul style="list-style-type: none"> - If development application on the property approved, request amendment to Chapter 17 | Approved Official Plan Amendments will be incorporated into the new OP following approval by the Province. |
| 35 | Letter from GSAI on behalf of Various Clients and Properties | <ul style="list-style-type: none"> - Chapter 3.3 and Schedule 1- repeat previous comments seeking revisions to the Central Erin Mills Growth Node, Dixie-Dundas Growth Node and Port Credit Growth Node boundaries to enable contextually appropriate development - Request that policy 4.2.2 regarding aiming to achieve net zero emissions be removed as it adds barriers to development reaching final/design implementation stages. - Policy 4.3.5.5 should be revised to reference minimum parkland dedication requirements established by the Planning Act - Chapter 5 (policies 5.2.3, 5.2.4 and Table 5.1)– concerns regarding restrictiveness of affordable housing policies, request reduction of required family-sized units (20% or less) - Chapter 8 (policies 8.2.9.c), 8.6.1.b) 8.6.2.5, 8.6.2.6 and Figure 8.9) – concerns regarding mid-rise height limitations, ROW limitations, angular plane requirements, and transition policies - Request that policy 8.4.5.2 in relation to POPS be modified to remove reference to a City Standard and adherence to same. - Policy 10.2.5.10 and 10.2.6.4 – overly restrictive and first policy should be removed - Policy 10.2.6.3- premature and should be removed, wording of the scenarios is unclear - Policy 10.2.6.5- concerned, should be removed or permit reduction in Office GFA | <ul style="list-style-type: none"> - Outside the scope of the OP review. - The language does not require buildings to achieve near net zero but underlines the City’s support of such objective. The City is working on developing ways to support sustainability through the Climate Change Action Plan. - Policy 4.3.5.5 is a Character Area-wide target for planning purposes for how much parkland the City ideally wants, depending on the location of the proposed park. It does not directly relate to what a developer must contribute on their specific application (this is outlined in Policy 18.18.2 which conforms to the Planning Act) - Table 5.1 deleted. Policy amended to respond to MMAH comments related to PPS consistency with providing a target city-wide for affordable housing. - 8.4.5.2 - Noted, language is qualitative and to ensure built form is up to the City’s standards. - 10.2.6.3 is a city-wide policy and is required to ensure sufficient and viable retail is preserved. - 10.2.6.5 changed |

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| | | <ul style="list-style-type: none"> - Policy 10.2.7.4 – consider applying Mixed-Use Limited designation to Clarkson Go lands - Policy 13.3.3.1 – concerned where urban design guidelines have been elevated to policy (e.g. tower separation distances and use of 45 degree angular plane) - Policies 13.1.1.5 and 13.1.2.5 – are too restrictive and should be removed - Chapter 14 – Policies for Central Erin Mills, Sheridan and South Common Growth Nodes are not consistent with MOPA 115 - Glossary: “Compatible” - request definition be returned to in effect Official Plan definition | |
| 36 | Letter from GWD on behalf of 2915, 2917, 2919 and 2921 Derry Rd E | <ul style="list-style-type: none"> - Policy 10.2.6.3 should only apply to Mixed Use project containing residential dwelling units as the predominant land use and not to commercial projects containing hotel, banquet hall, restaurant, or office uses as contemplated by the landowner. - Policy 11.3.3 criteria is overly restrictive, vague, and unclear. - Schedule 8p – building heights show as 2-4 storeys, request change to 2-9 storeys | <ul style="list-style-type: none"> - 10.2.6.3 is a city-wide policy and is required to ensure sufficient and viable retail is preserved. - The criteria in policy 11.3.3.2 will be applied and assessed on a site-specific basis to when an Official Plan Amendment application is initiated. - As part of MOP 2051, the review of MTSA heights was undertaken to determine if there was planning merit for height increases based on criteria. This evaluation resulted in changes that allow higher heights mostly for areas adjacent to higher order transit corridors or stations. It is necessary as heights are examined to ensure proper transition outward from the highest heights to adjacent neighbourhoods. Additional height can be achieved without amendment to the plan through policies compensating for IZ units and above-ground commercial uses. At this time, it has been determined that the height within the subject site is appropriate as the PMTSA still meets the minimum density required and the height issues proper transition to the adjacent neighbourhood. |
| 37 | Letter from GSAI on behalf of Lakeview Village | A list of changes related to the Lakeview development – please see letter #37 | <ul style="list-style-type: none"> - Schedule 2- Update will be undertaken when possible – Natural Hazard lines are conceptual and may be out of date, development proponents are to check updated data posted by the applicable conservation authority. - Schedule 6- All line work is conceptual. Changes subsequent to development approvals will be reflected in future updates. - Schedule 7N- Block 8 has been updated to “Residential High Rise”. Water is not taken into account since it is not considered to be buildable. - Schedule 8Q- Block 8 has been updated to “Residential High Rise”. Development applications will be reflected through future amendments. - Road names will be reflected through future housekeeping amendments. Water is not taken into account since it is not considered to be buildable. - Policy 14.2.4.8.2 – Council approved guidelines are still relevant regardless of whether they are included under the same cover. - The official Plan has been updated to align with the Ministerial Zoning Order. |
| 38 | Letter from GSAI on behalf of 3435 Eglinton Ave W | <ul style="list-style-type: none"> - Chapter 3 (3.3) and Schedule 1- request greater flexibility in permitted heights in Neighbourhoods - Chapter 8 (policies 8.6.1.b), 8.2.9.c), 8.6.2.5 and Figure 8.9) – concerns regarding limitations of mid-rise building policy, angular plane requirements and transition policies - Chapter 10 (policy 10.2.6.3) concerns regarding retail retention policy | <ul style="list-style-type: none"> - Better examined through the approval process. - Noted, Figure 8.9 depicting a 45 angular plane has been deleted. - 10.2.6.3 is a city-wide policy and is required to ensure sufficient and viable retail is preserved. |
| 39 | Letter from GSAI on behalf of 2555 Erin Centre Blvd | <ul style="list-style-type: none"> - Chapter 3 (3.3) and Schedule 1- request lands be added to Central Erin Mills Growth Node - Chapter 8 (policies 8.2.9.c), 8.6.2.5, 8.6.2.6 and Figure 8.9) – concerns regarding angular plane requirements and transition policies - Chapter 10 (policy 10.2.6.3) concerns regarding retail retention policy - If development application on the property approved, request amendment to Chapter 17 | <ul style="list-style-type: none"> - Outside the scope of the OP review. - Noted, Figure 8.9 depicting a 45 angular plane has been deleted. - 10.2.6.3 is a city-wide policy and is required to ensure sufficient and viable retail is preserved. - Approved Official Plan Amendments will be incorporated into the new OP following approval by the Province. |
| 40 | Letter from GSAI on behalf of 2980 Crosscurrent | <ul style="list-style-type: none"> - Chapter 3 (3.3) and Schedule 1- request greater flexibility in permitted heights in Neighbourhoods - Chapter 8 (policies 8.6.1.b), 8.2.9.c), 8.6.2.5 and Figure 8.9) – concerns regarding limitations of mid-rise building policy, angular plane requirements and transition policies - Chapter 10 (policy 10.2.6.3) concerns regarding retail retention policy | <ul style="list-style-type: none"> - Better examined through the approval process. - Figure 8.9 depicting a 45 angular plane has been deleted. - 10.2.6.3 is a city-wide policy and is required to ensure sufficient and viable retail is preserved. |

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| 41 | Letter from GSAI on behalf of 0-6500 Ninth Line | <ul style="list-style-type: none"> - Chapter 4 (policies 4.2.2, 4.2.4, 4.3.5.5) regarding net zero, parkland dedication and Green Development Standard requirements - Request explicit policy reference in the Precinct 3 policies for the Ninth Line Neighbourhood to not withstand the Residential Mid-Rise Designation (Chapter 11) - Chapter 8 (policies 8.2.9.c), 8.6.2.5, 8.6.2.6 and Figure 8.9)- concerns regarding angular plane requirements and transition policies | <ul style="list-style-type: none"> - The language does not require buildings to achieve near net zero but underlines the City’s support of such an objective. The City is working on developing ways to support sustainability through the Climate Change Action Plan. - Noted, Figure 8.9 depicting a 45 angular plane has been deleted |
| 42 | Letter from GSAI on behalf of 579 Lakeshore Rd E | <ul style="list-style-type: none"> - Chapter 3 (3.3) and Schedule 1- request greater flexibility in permitted heights in Neighbourhoods - Chapter 5 (policies 5.2.3, 5.2.4 and Table 5.1) – concerns regarding restrictiveness of affordable housing policies - Chapter 8 (policies 8.6.1.b), 8.2.9.c), 8.6.2.6), 8.4.5.2, and Figure 8.9) – concerns regarding height limitations, ROW limitations, angular plane requirements and POPS conforming to City standards - Chapter 10 (policy 10.2.6.3) concerns regarding retail retention policy | <ul style="list-style-type: none"> - Better examined through the approval process. - Table 5.1 deleted. Policy amended to respond to MMAH comments related to PPS consistency with providing a target city-wide for affordable housing. - Figure 8.9 depicting a 45 angular plane has been deleted. - 8.4.5.2 - Noted, language is qualitative and to ensure built form is up to the City’s standards. - 10.2.6.3 is a city-wide policy and is required to ensure sufficient and viable retail is preserved. |
| 43 | Letter from Weston Consulting on behalf of 2090-2100 Hurontario St | <ul style="list-style-type: none"> - Concern that heights in Schedule 8I are too prescriptive - Request to redesignate the lands “Residential High-Rise” - Request to be kept informed of the Official Plan Review process | <ul style="list-style-type: none"> - It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. - Noted, email has been added to the circulation list |
| 44 | Letter from GSAI on behalf of 2157 Royal Windsor | <ul style="list-style-type: none"> - Request redesignation to permit residential uses (ultimately, to facilitate a mixed-use development) and remove the existing “Employment Lands” designation. - Concerns with 4.2.2 regarding net zero emissions and how it will be enforced - Concerns about enforcing policy 5.2.3 and how it may be treated as more of a ‘requirement’. Would like to know where such a high percentage came from. | <ul style="list-style-type: none"> - It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. - The language does not require buildings to achieve near net zero but underlines the City’s support of such objective. The City is working on developing ways to support sustainability through the Climate Change Action Plan. |
| 45 | Letter from Design Plan Services on behalf of De Zen Realty Ltd (66 & 64 Thomas Street, 95 Joymar Drive, & 65 Tannery Street) | <ul style="list-style-type: none"> - Request lands be designated “Residential High-Rise” and not be subject to the limiting policies of “Special Site 49” so that the Official Plan Amendment for these properties that was deemed complete on January 17th, 2025 will no longer be required. - Also request to be kept informed of the Official Plan Review process. | <ul style="list-style-type: none"> - It is not within the scope of the OP review to redesignate specific properties. Redesignation requires specific studies that inform the land use designation change at the property level. - Noted, email has been added to the circulation list |
| 46 | Letter from Mississauga Aquatic Club | <ul style="list-style-type: none"> - Request a designated Home Pool and the construction of a 50 Meter Pool in Mississauga | <ul style="list-style-type: none"> - These comments have been noted. |
| 47 | Letter from MHBC on behalf of Mississauga Entertainment Centrum (30-110 Courtneypark Drive East and 40, 75 & 90 Annagem Boulevard) | <ul style="list-style-type: none"> - Request removal of lands from Employment Area or policy be added to indicate Special Permission Areas not be considered part of the employment area (policy 16.10.2) - Request a Special Site designation to recognize existing commercial functions - “Service establishment” and “personal service establishment” terms both used interchangeably, request one term to avoid confusion - Typo with reference to the map in Policy 16.10.2.1 | <ul style="list-style-type: none"> - Use is considered a lawfully established use under the provisions of the <i>Planning Act</i>. A change in designations needs to occur through a request to remove the lands from the Employment Areas in accordance with the PPS 2024. - It is not within the scope of the OP review to redesignate properties. Redesignation requires specific studies that inform the land use designation change at the property level. - This could be examined through a future zoning conformity exercise. - The typo in policy 16.10.2.1 has been corrected |
| 48 | Letter from GSAI on behalf of 65 Park St E | <ul style="list-style-type: none"> - Policy 4.2.2 – concerned what near net zero emissions means for development applications - Chapter 5 (Policies 5.2.3.a) and 5.2.4)- too restrictive - Chapter 8 (policies 8.6.2.5, 8.2.9.c), 8.6.2.11- request more flexibility - Policy 10.2.5.10 has not been reworded from last year’s comment, request existing City OP policy 16.1.2.4 be used as was adequate - Schedule 8o – request height of “22-25 storeys”; minimum height should be at least 12 storeys to reflect height permission in policy 10.2.5.10 - Chapter 11 (policies 11.3.3.2 and 11.3.3.3)- too rigid | <ul style="list-style-type: none"> - The language does not require buildings to achieve near net zero but underlines the City’s support of such an objective. The City is working on developing ways to support sustainability through the Climate Change Action Plan. - Policy amended to respond to MMAH comments related to PPS consistency with providing a target city-wide for affordable housing. - Noted, these policies have been significantly changed to provide for a more flexible language. - Policy language is necessary to support the new residential designations. Variation can be requested through the approval process. - Policies provide flexibility for additional height beyond PMTSA maximum heights. |
| 49 | Letter from GSAI on behalf of 4100 Ponytrail Dr & 1850 Rathburn Rd | <ul style="list-style-type: none"> - Policy 4.2.2 – concerned what near net zero emissions means for development applications - Chapter 5 (Policies 5.2.3 and 5.2.4)- too restrictive | <ul style="list-style-type: none"> - The language does not require buildings to achieve near net zero but underlines the City’s support of such objective. The City is working on developing ways to support sustainability through the Climate Change Action Plan. |

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| | | <ul style="list-style-type: none">- Chapter 8 (policies 8.6.2.5, 8.2.9.c), 8.6.1, 8.6.2.11- request more flexibility- Policy 14.1.1.4.c- concerns regarding ‘corridor’ policies- Chapter 15 (policies 15.1.1.6, 15.1.1.7, 15.1.3.3) – should be revised, urban design requirements restrictive | <ul style="list-style-type: none">- Policy amended to respond to MMAH comments related to PPS consistency with providing a target city-wide for affordable housing.- Noted, these policies have been significantly changed to provide for a more flexible language.- Noted, future studies will examine the opportunities for intensification along certain neighbourhood streets.- Noted, see previous response. |
|--|--|--|--|

Mark Flowers
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File No. 704775

January 21, 2025

By E-Mail Only to official.plan@mississauga.ca

Ben Phillips, Project Manager and Amina Menkad, Project Lead
Mississauga Official Plan Review
Mississauga Civic Centre
300 City Centre Drive
Mississauga, ON L5B 3C1

Dear Sir/Madam:

**Re: Proposed Mississauga Official Plan 2051 (“MOP 2051”)
2300 Confederation Parkway, Mississauga**

We are counsel to 1370569 Ontario Inc. (“Kaneff”), the owner of the lands municipally known as 2300 Confederation Parkway in the City of Mississauga (the “Subject Lands”). The Subject Lands are currently occupied by a 17-storey residential building and located within the Queensway Protected Major Transit Station Area (“PMTSA”).

We have reviewed proposed changes to the MOP 2051 as outlined in the draft MOP 2051 released last week and the Public Meeting MOP 2051 Status Update report of the Commissioner of Planning & Building, dated November 27, 2024 (the “Staff Report”), which was considered by the City’s Planning and Development Committee at its meeting on December 9, 2024. In particular, we have reviewed staff’s recommendations for increased building heights on certain lands within PMTSAs and are writing to provide Kaneff’s comments.

Kaneff has significant concerns that the Subject Lands have been excluded from the areas identified for maximum height increases, as detailed in Schedule 8L of the draft MOP 2051 and Appendix 1 of the Staff Report.

The current maximum height applicable to the Subject Lands does not optimally support the achievement of minimum density targets set out in the MOP 2051. The Queensway PMTSA is planned for a minimum density of 300 people and jobs per hectare; however, the MOP 2051 only proposes height increases up to 35 storeys for areas of the Queensway PMTSA directly adjacent to Hurontario Street. The proposed PMTSA height limits, which restrict development on the Subject Lands to 25 storeys, do not achieve the objectives of optimizing the use of existing and planned infrastructure and public service facilities, including public transit, and increasing housing supply.

The exclusion of the Subject Lands from the areas identified for increased building heights is particularly unjustified given that approvals for heights exceeding 25 storeys have been granted for properties in PMTSAs with lower minimum density targets than the Queensway PMTSA.

Policies that do not optimize the use of existing and planned infrastructure and/or may hinder the achievement of minimum density targets are inconsistent with provisions of the 2024 Provincial Planning Statement ("PPS 2024"). The height restrictions that apply to the Subject Lands are also inconsistent with provisions of the PPS 2024 that require planning authorities to permit and facilitate intensification "in proximity to transit, including corridors". The Subject Lands are adjacent to Queensway West, which is identified as a "Corridor", and located in close proximity to Hurontario Street, which is identified as an "Intensification Corridor". Further intensification of the Subject Lands through increased building heights would therefore align with the provisions of the PPS 2024.

Furthermore, the Subject Lands are situated less than 100 metres from the Trillium Hospital site, located on the south side of Queensway West, which is subject to a Ministerial Zoning Order permitting a maximum height of 120 metres, equivalent to approximately 40 storeys. Consequently, permitting a maximum building height significantly greater than 25 storeys on the Subject Lands would be in keeping with the planned built form context and in conformity with the City's built form transition policies.

Kaneff therefore requests that the maximum height for the Subject Lands be increased from 25 storeys to 35 storeys, or more, under the MOP 2051.

We thank you in advance for your consideration of our comments and look forward to seeing Kaneff's request reflected in the next draft of the MOP 2051. In the meantime, we would welcome the opportunity to discuss Kaneff's request with you.

Kindly ensure that we are included on the notification list for the Official Plan Review and that we receive notice of any future public meeting(s).

Yours truly,
DAVIES HOWE LLP



Mark R. Flowers
Professional Corporation

MRF:lc

copy: Client

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File No. 704776

January 21, 2025

By E-Mail Only to official.plan@mississauga.ca

Ben Phillips, Project Manager and Amina Menkad, Project Lead
Mississauga Official Plan Review
Mississauga Civic Centre
300 City Centre Drive, 2nd Floor
Mississauga, ON L5B 3C1

Dear Sir/Madam:

**Re: Proposed Mississauga Official Plan 2051 (“MOP 2051”)
2170 Sherobee Road, Mississauga**

We are counsel to 945324 Ontario Inc. (“Kaneff”), the owner of the lands municipally known as 2170 Sherobee Road in the City of Mississauga (the “Subject Lands”). The Subject Lands are currently occupied by a 19-storey residential building and is located within the North Service Protected Major Transit Station Area (“PMTSA”).

We have reviewed proposed changes to the MOP 2051 as outlined in the draft MOP 2051 released last week and the Public Meeting MOP 2051 Status Update report of the Commissioner of Planning & Building, dated November 27, 2024 (the “Staff Report”), which was considered by the City’s Planning and Development Committee at its meeting on December 9, 2024. In particular, we have reviewed staff’s recommendations for increased building heights on certain lands within PMTSAs and are writing to provide Kaneff’s comments.

Kaneff has significant concerns that the Subject Lands have been excluded from the areas identified for height maximum increases, as detailed in Schedule 8L of the draft MOP 2051 and Appendix 1 of the Staff Report.

The current maximum height applicable to the Subject Lands does not optimally support the achievement of minimum density targets set out in the MOP 2051. The North Service PMTSA is planned for a minimum density of 300 people and jobs per hectare. However, the MOP 2051 proposes no height increases within the North Service PMTSA. Current PMTSA height limits, which restrict development on the Subject Lands to 25 storeys, do not achieve the objectives of optimizing the use of existing and planned infrastructure and public service facilities, including public transit, and increasing housing supply.

The exclusion of the Subject Lands from the areas identified for increased building heights is particularly unjustified given that approvals for heights exceeding 25 storeys have been granted for properties in PMTSAs with lower minimum density targets than the North Service PMTSA.

Policies that do not optimize the use of existing and planned infrastructure and/or may hinder the achievement of minimum density targets are inconsistent with provisions of the 2024 Provincial Planning Statement ("PPS 2024"). The height restrictions that apply to the Subject Lands are also inconsistent with provisions of the PPS 2024 that require planning authorities to permit and facilitate intensification "in proximity to transit, including corridors". The Subject Lands fronts onto Hurontario Street, which is identified as an "Intensification Corridor". Further intensification of the Subject Lands through increased building heights would therefore align with the provisions of the PPS 2024.

Furthermore, the Subject Lands are immediately adjacent to an area of the Queensway PMTSA identified for a height maximum increase to 35 storeys. Consequently, permitting a building height significantly greater than 25 storeys on the Subject Land would be in keeping with the planned built form context and in conformity with the City's built form transition policies.

Kaneff therefore requests that the maximum height for the Subject Lands be increased from 25 storeys to 35 storeys, or more, under the MOP 2051.

We thank you in advance for your consideration of our comments and look forward to seeing Kaneff's request reflected in the next draft of the MOP 2051. In the meantime, we would welcome the opportunity to discuss Kaneff's request with you.

Kindly ensure that we are included on the notification list for the Official Plan Review and that we receive notice of any future public meeting(s).

Yours truly,
DAVIES HOWE LLP



Mark R. Flowers
Professional Corporation

MRF:lc

copy: Client

January 28, 2025

Amina Menkad, Project Lead
Ben Phillips, Project Manager

City of Mississauga
300 City Centre Drive
Mississauga, ON L5B 3C1

Via email: official.plan@mississauga.ca

Dear Amina Menkad and Ben Phillips:

RE: Official Plan Review – December 2024 Draft
City of Mississauga
MHBC File: PAR 50060

MacNaughton Hermsen Britton Clarkson (MHBC) are the planning consultants for TransCanada PipeLines Limited (TCPL). This letter is in response to the December 2024 draft of the new Official Plan for the City of Mississauga. 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.

We would like to thank the City for expanding the pipeline policies in *Section 18.19, Infrastructure and Utilities* in the revised draft. Based on our review of the revised draft of the new Official Plan, we wish to provide the following requested revisions for your consideration:

Green underline = addition

~~Red-strikethrough~~ = deletion

18.19.8 The rights-of-way and facilities of ~~A~~major pipeline corridors and related facilities, ~~the rights-of-way and facilities~~ will be protected for current and future projected needs.

18.19.9 Development resulting in increased population density in proximity to natural gas and oil pipelines' rights-of-way may require pipelines to be replaced. Early consultation with energy providers for any development proposals within 200 metres of pipelines should be undertaken to ensure proper assessment of potential impacts, to provide recommendations and to avoid adverse impacts to energy infrastructure and facilities.

18.19.10 The Canadian Energy Regulator Act defines a Prescribed Area of 30 metres on either side of a natural gas and oil pipeline and requires authorization for ground disturbances and crossings within

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this Prescribed Area. Energy providers should be consulted early in the land use, subdivision and development process to confirm all requirements.

18.19.11 Setbacks of a residence, place of work, or public assembly to an oil or gas easement or associated structure, and an appropriate building design, in consultation with the applicable gas/oil pipeline operator, will be determined based on the type of pipeline and stress level of the pipeline.

18.19.12 Existing or new easements accommodating gas and/or oil pipelines should be incorporated into development plans. These easements may provide for public open space, walkways or bicycle paths, but shall not be incorporated into individual lots. In some cases land uses may be prohibited and additional setbacks shall be required. Consultation with the applicable gas/oil pipeline operator and written consent may be required prior to any activity on or near the rights-of-way.

Thank you for the opportunity to comment. We look forward to reviewing the updated Official Plan. If you have any questions, please do not hesitate to contact our office at TCEnergy@mhbcplan.com.

Sincerely,

MHBC



Kaitlin Webber, MA
Intermediate Planner | MHBC Planning

on behalf of TransCanada PipeLines Limited

January 23rd, 2025

Shaesta Hussen
 Planner, Official Plan & Planning Data Initiatives
 Planning and Building Department, City Planning Strategies Division
 City of Mississauga
 300 City Centre Drive
 Mississauga, Ontario

**Re: Planning and Development Committee: Proposed Mississauga Official Plan 2051 – Status Update
 Trillium Health Partners' (THP) Response to Schedule 8L: Proposed Building Heights for the Queensway PMTSA**

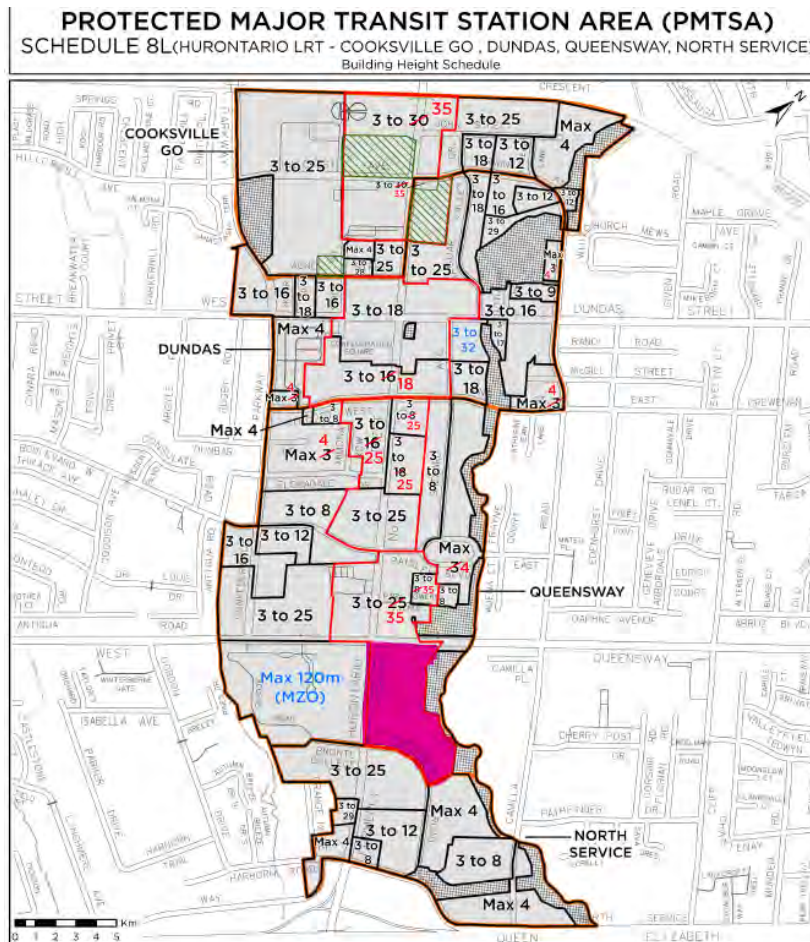
Dear Ms. Hussen,

On behalf of Trillium Health Partners (THP), we thank you for the opportunity to submit comments on the Proposed Mississauga Official Plan 2051 – Status Update report to the Planning and Development Committee (PDC) meeting of December 9th, 2024. THP has a specific interest in the proposed building height adjustments within Schedule 8L applicable to the Queensway PMTSA, and particularly the area around the Hurontario Street and Queensway West intersection. We understand that this PDC meeting represents the first public information meeting on the draft Official Plan policy changes and that the next PDC meeting (likely in March 2025) is intended to be the statutory public meeting seeking adoption of the new policies.

This letter outlines THP's initial comments and seeks clarification regarding the increased maximum building height from 25 storeys to 35 storeys in the area east of Hurontario Street and south of Queensway West. This area, as generally depicted in pink shading on **Figure 1** on the next page, represents THP's primary concern regarding the relationship of future development to the planned helicopter flight for the new Peter Gilgan Mississauga Hospital (PGMH). As you are aware, the PGMH development is currently advancing through Site Plan Approval for the new hospital tower, with construction already complete on the new parkade structure. It is essential for operations of the new hospital, once complete, to have a clear and unrestricted flight path. To this end, we are seeking to understand how the maximum height of 35 storeys has been determined in this location and how future development here would be reviewed and regulated to ensure the hospital's flight path is not compromised.

Currently, THP has engaged AVIA NG Airport Consultants to prepare a Future Heliport Flight Path Diagram (attached as **Appendix A** to this letter). This diagram demonstrates the area of impact for THP's planned flight path and the recommended maximum elevation (based on final approach and take off) for which the height of new development should not exceed to avoid interference.

Figure 1: PMTSA and PGMH Flight Path Impact



At this time, THP has the following initial comments and requests for future consultation:

1. That THP be added to the formal notification list for any development applications in a location that may affect the flight path for the planned heliport, as identified in the area shaded in blue on the Future Heliport Flight Path Diagram (Appendix A).
2. There does not appear to be sufficient detail available for THP to confirm that a potential development up to 35 storeys would not present a conflict with the flight path. For example, a 35-storey maximum height would not precisely limit the total building height measured in metres, nor does it limit floor-to-floor heights of a given storey. Further, any building elements which are not considered a storey but contribute to overall height (e.g. rooftop mechanical areas, equipment and any other projections) should be accounted for in judging impact to the flight path.

Repair or maintenance activities may cause additional projections, and partly for this reason it is a typical industry standard to include a 2.5-3.0 metre buffer below the maximum elevation as the maximum height of new development.

If there have been any assumptions made regarding the details of future development (e.g. floor-to-floor heights, calculation of total building height, rooftop mechanical and projections, etc.), which could be used to assess acceptable maximum building height adjacent to the PGMH, we request that the City please share this with THP.

3. That THP and City Planning staff meet to further discuss the proposed policies impacting the PGMH flight path, including potential policy and regulatory approaches to ensuring that future development will not be in conflict.

Should you have any questions or follow-ups regarding the above, please do not hesitate to contact me directly.

Sincerely,



Corey Horowitz, MCIP, RPP
Senior Urban Planner, DIALOG
416 849-6833
chorowitz@dialogdesign.ca

cc.

Chris Rouse, City of Mississauga
Ashlee Rivet-Boyle, City of Mississauga
Jaspreet Sidhu, City of Mississauga
Amina Menkad, City of Mississauga
Michelle Innocente, THP
Darnell Williams, THP
Matt Kenney, THP
Dan Fox, Avia NG
Bruno Ierullo, Ellis Don



From: [Mallory Nieves](#)
To: [Lauren Eramo-Russo](#); [Amina Menkad](#); [Ben Phillips](#); [Luisa Galli](#)
Cc: [Sidra Asif](#)
Subject: [EXTERNAL] 5060 & 5150 Spectrum Way: Official Plan Review
Date: Friday, January 31, 2025 11:34:50 AM
Attachments: [image001.png](#)

[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.]

Hi all,

Hope all are well. I am reaching out to have a discussion with staff regarding the draft OP policies as they relate to the properties located at 5060 & 5150 Spectrum Way. We had provided letters to the City recommending that the permissions for a variety of industrial uses be expanded back in July. We also had a Pre-Consultation Meeting with staff in December where we were advised that the OP policies for the area would be changed to allow more flexibility, based on the PPS/Planning Act changes. With the policy in the new Draft OP still prohibiting warehousing south of Matheson, the development potential for the site is compromised. Potential owners of the site are looking to develop something similar to the future development planned for 1833 Buckhorn Gate. An application was approved there for small bay warehousing. We were looking to discuss with staff if there is any opportunity for flexibility within the policies to allow small bay warehousing, similar to what is being developed at 1833 Buckhorn Gate. If you could please kindly provide your availability it would be appreciated! Thanks very much and looking forward to discussing. We would also like to include Northbridge Capital and Cushman Wakefield in this discussion, as they were present at the Pre-Consultation meeting for 5060.

Thanks very much,

Mallory Nieves, MES, MCIP, RPP
Associate

Vacation Alert: I will be on vacation February 27th to March 6th

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privileged, confidential, or private information which is not to be disclosed. If you are not the addressee or an authorized representative there, please contact the undersigned and then destroy this message.

Taranjeet Uppal

From: Alexandre Thibault <Alexandre.Thibault@cn.ca> on behalf of Proximity <proximity@cn.ca>
Sent: Wednesday, February 5, 2025 2:11 PM
To: Official Plan
Subject: [EXTERNAL] 2025-02-05_CN Comments on New Mississauga Official Plan 2051

[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.]

Dear Madam / Sir,

Based on our review of the Mississauga's Official Plan planning policies, we believe that the City should strengthen these planning policies to include more explicit acknowledgment and clear, robust policies regarding developments in proximity to existing rail facilities. These policies should focus on implementing mutual protection measures to prevent, mitigate, or minimize negative impacts on and from railway corridors. By incorporating stronger language and more explicit regulations, municipalities will be provided with a strong and solid foundation for understanding and implementing municipal regulations aimed at protecting railway operations and preventing adverse effects on future developments near railway corridors and infrastructure.

About CN, Railway operational emissions, and other adverse effects

CN is a federally regulated railway company, and is governed by various federal legislation, including the *Canada Transportation Act* (CTA) and the *Railway Safety Act* (RSA), among others. The CTA requires federally regulated railway companies to only make such noise and vibration as is reasonable. The test of reasonableness under the CTA takes into consideration the railway company's operational requirements and its level of service obligations under the Act, as well as the area where the construction or operation takes place. The Canadian Transportation Agency (Agency) is the federal body that assesses the reasonableness of noise associated with the construction or operation of a federal railway company. In its decisions, the Agency has concluded that municipalities have a responsibility to assess compatibility issues before approving housing developments in proximity to railway rights-of-way. The CTA also commented that where a municipality approves the development, it has a responsibility to ensure that the necessary mitigation measures are implemented. One example of such a decision is Decision No. 69-R-2014, dated February 27, 2014.

It is crucial to note that federal guidelines pertaining to the construction and operation of rail facilities do not specify a definitive decibel limit. While the Agency may consider provincial and municipal noise and vibration guidelines during its deliberations, it is not bound by these guidelines.

Specifically, rail yards operate on a 24/7 basis, engaging in activities that include but are not limited to:

- The operation and idling of diesel locomotives and trucks;
- Continuous, 24-hour artificial lighting;
- The loading, unloading, and switching of rail cars;
- The bulk transfer of cargo, including dangerous goods; and
- Other miscellaneous activities related to the maintenance and repair of rail and other equipment.

Rail yards must be evaluated on a case-by-case basis as each yard's operations and activities vary. Rail yard noise and operations should be investigated separately, encompassing not only idling locomotive and wheel/track noise on straight track but also considering wheel squeal on curves and switches, brake squeal, compressed air releases, coupling impact noises, warning bells, acceleration and high engine load exhaust and crankcase noise, generator, and refrigerator car noises, as well as ancillary yard activities such as loudspeakers, compressors, and other mechanical equipment associated with specific yard activities and repair operations. Air emissions and lighting impacts may also require consideration.

CN rail facilities and operations are integral components of Manitoba's economy and should be protected from encroachment by sensitive land uses and developments within the zone of influence as determined by the [FCM/RAC guidelines](#). This proactive approach will help prevent future land use incompatibility issues and conflicts.

The FCM-RAC Guidelines recommend that approval authorities, such as municipalities, adopt a proactive approach to identifying potential land use conflicts for developments located near railway operations. These guidelines provide a valuable resource for managing development around railway infrastructures.

For information on how to address railway noise complaints, refer to the [Canadian Transportation Agency's Guidelines for the Resolution of Complaints Over Railway Noise and Vibration](#). These guidelines outline the process for filing noise complaints and the factors considered when resolving such disputes.

Preliminary Comments and Concerns

As previously noted, while the CTA has acknowledged that municipalities approving development are responsible for ensuring the implementation of necessary mitigation measures related to rail infrastructure, the ultimate responsibility lies with municipalities to establish these appropriate policies and development review processes. Despite the federal government delegating this responsibility to municipal governments, CN has observed instances where municipalities have neglected to adopt or implement necessary mitigation measures around railway infrastructures, resulting in conflicts between developments and railway operations.

Consequently, if the City of Mississauga planning policies were to complement the CTA's and CN's ongoing efforts to mandate municipalities to adequately adopt and integrate railway mitigation measures and appropriate strategies, the land use incompatibility issues between railway operations and future developments could be further alleviated. This mutually beneficial outcome would positively impact all stakeholders.

Recommendations

To support the implementation of mitigation measures concerning developments in proximity to railway operations, the City of Mississauga should consider the following recommendations within its planning policies to:

- Strengthen the City's mandate in reinforcing the implementation of substantial mitigation measures pertaining to new developments in proximity to railway operations.

- Prioritize rail infrastructure policies and adopt relevant rail infrastructure policies within its land-use and development bylaws.
- Promote risk mitigation measures and focus on mitigating risks, protecting railway operations, and enhancing the quality of life for the residents of future developments.

Our recommendations are outlined as follows:

1. Include a specific definition of Rail Facilities

To ensure clarity regarding the scope of railway infrastructures and what is required to be protected by necessary mitigation measures, we recommend including the following definition within the Official Plan.

Rail Facilities: means rail corridors, rail sidings, train stations, inter-modal facilities, rail yards and associated uses, including designated lands for future rail facilities.

Sensitive Land Uses: means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more adverse effects from contaminant discharges generated by a nearby major facility. Sensitive land uses may be a part of the natural or built environment. Examples may include, but are not limited to: residences, day care centres, and educational and health facilities, playgrounds, sporting venues, public parks and trails, recreational areas, places of worship, community centre, hotels, retirement residences and long-term care homes, group residences, crisis centre, and any uses that are sensitive to dust, odour, noise and vibration emissions.

2. Recommended Railway Related Policies

The following specific policies should be included in the City planning policies, with respect to the [Guidelines for New Development in Proximity to Railway Operations:](#)

- All proposed residential developments or other sensitive uses located within 300 meters of a railway right-of-way be required to undertake noise studies, to the satisfaction of the Municipality, in consultation with the appropriate railway operator, and shall implement the appropriate measures to mitigate any adverse effects from noise that were identified in the study;*
- All proposed residential developments or other sensitive uses located within 75 meters of a railway right-of-way be required to undertake vibration studies, to the satisfaction of the Municipality, in consultation with the appropriate railway operator, and shall undertake to implement the appropriate measures to mitigate any adverse effects from vibration that were identified in the report;*
- All proposed new buildings to be occupied by sensitive land uses shall be setback 300 meters from a Rail Yard facility boundaries;*
- All proposed buildings to be occupied by sensitive uses shall be setback 30 meters from a Principal Main line with an appropriate safety berm abutting the railway right of way;*
- All proposed buildings to be occupied by sensitive land uses shall be setback 15 meters from a Branch line with an appropriate safety berm abutting the railway right of way;*
- All proposed buildings to be occupied by sensitive land uses shall be setback 15 meters from a Spur line;*

- g) *The required safety berm shall be adjoining and parallel to a Principal Main line right-of-way with returns at the ends, 2.5 meters above grade at the property line, with side slopes not steeper than 2.5 to 1;*
- h) *The required safety berm shall be adjoining and parallel to a Branch line right of way with returns at the ends, 2 meters above grade at the property line, with side slopes not steeper than 2.5 to 1;*
- i) *A specific crash barrier study and design must be produced for reduced safety setbacks, to the satisfaction of the Municipality, in consultation with the appropriate railway operator;*
- j) *A chain link fence of a minimum 1.83 meter in height shall be installed and maintained along the mutual property line shared with the railway right of way for all proposed developments;*
- k) *All residential development and/or subdivisions for sensitive land uses located between 300 meters and 1000 meters of a rail yard facilities boundary should undertake land use compatibility studies, to the satisfaction of the Municipality and the appropriate railway operator, to support the feasibility of the development and, if feasible, shall implement appropriate measures to mitigate any adverse effects that were identified;*
- l) *All proposed residential developments or other sensitive uses located in proximity to a railway right of way shall implement the applicable warning clauses provided by the appropriate railway operator;*
- m) *All proposed residential developments or other sensitive uses located adjacent or within 300 meters of a principal main line shall implement, secure, and maintain any required rail noise, vibration, and safety impact mitigation measures, along with any required notices on title, such as development agreements, warning clauses and/or environmental easements, through appropriate legal mechanisms, to the satisfaction of the Municipality and the appropriate railway operator;*
- n) *All proposed vehicular property access points shall be located at a minimum 30-metre setback from at-grade railway crossings; and,*
- o) *An at-grade rail crossing where the railway design speed is more than 25 km/h must be constructed so that no part of the traveled way of an intersection road is closer than 30 meters to the nearest rail of the grade crossing.*

3. Transportation

Advance notification to CN regarding new road planning is vital to ensure proper railway operations. Adopting a collaborative approach will facilitate addressing any potential concerns and enable the creation of a well-planned and secure road network in consideration of CN operations.

To ensure effective coordination and planning, the City of Mississauga should proactively notify CN and other appropriate rail companies about any planned changes to transportation infrastructures. These notifications should include details regarding changes in land use, traffic intensity, road widening, and the addition of sidewalks or bicycle/pedestrian paths or trails.

Furthermore, the City of Mississauga should collaborate with Transport Canada and the appropriate railway operator to evaluate and prioritize the implementation of grade separations between railways and major roads. This collaborative approach will help to mitigate potential conflicts and ensure the efficient and safe operation of both transportation modes.

4. Stormwater Management Facility Design

Railway corridors/properties with their relative flat profile are not typically designed to handle additional stormwater flows from neighboring properties, therefore future developments should not discharge or direct stormwater, roof water, or floodwater onto a railway right-of-way. Any proposed alterations to the existing drainage pattern affecting railway property must receive prior concurrence from the appropriate railway operator.

Stormwater or floodwater flows should be designed to maintain the structural integrity of the railway corridor infrastructure; avoid sediment deposits; and prevent adverse effects on the railway right-of-way. Drainage systems should be designed to capture storm waters on-site or divert the flow away from the rail corridor to an appropriate drainage facility.

Stormwater management facilities must be designed to control stormwater runoff to pre-development conditions including the duration and volume of the flow and accordingly have no impacts on the railway right of way, including ditches, culverts, and tracks. The City of Portage la Prairie, through policy or communications, could assist in the communication and reinforcement of appropriate stormwater management facility design and help promote the design and development of adequate drainage systems around railway rights-of-way.

Conclusion

We would like to thank you for considering our recommendations that aim to assist in the implementation of planning best practices for future developments in proximity to rail facilities and the safety and well-being of their occupants. We look forward to working with the City of Mississauga throughout this process.

Please forward all future communications, land development applications, and documents to proximity@cn.ca

Yours sincerely,



CN Proximity

E: proximity@cn.ca

What's New at CN | Quoi de neuf au CN

February 10, 2025

MGP File: 21-2982

Andrew Whittemore, Commissioner of Planning & Building
City of Mississauga
300 City Centre Drive
Mississauga, ON L5B 3C1

via email: official.plan@mississauga.ca

**Attention: Andrew Whittemore, Commissioner of Planning & Building
c/o Amina Menkad / Ben Phillips**

Dear Mr. Whittemore:

**RE: Comments on the Draft Mississauga Official Plan 2051
RGF (Mississauga) Developments Inc., c/o HBNG Holborn Group
325 Burnhamthorpe Road West, City of Mississauga**

Malone Given Parsons Ltd. ("MGP") is the land use planner for RGF (Mississauga) Developments Inc., c/o HBNG Holborn Group ("Holborn Group"), the owner of the lands at 325 Burnhamthorpe Road West ("Subject Lands") within the City of Mississauga's Downtown Core.

On behalf of the Holborn Group, we have reviewed the Draft Mississauga Official Plan 2051, latest draft dated January 2025 ("Draft MOP") and are writing to provide our comments and concerns to City staff for their consideration and revision prior to Council's adoption of the Draft MOP.

We request that the City:

- Revise Maps 12-2.1, 12-2.4, 12-2.5, 12-2.6, and 12-2.7 of the Draft MOP to remove the new local road bisecting the Subject Lands to be consistent with OPA 161, approved by Ontario Land Tribunal ("Tribunal") by decision dated September 12, 2023; and
- Revise Map 12-2.2 of the Draft MOP to add a Proposed Pedestrian Connection and Upcoming Park on the Subject Lands to be consistent with OPA 161.

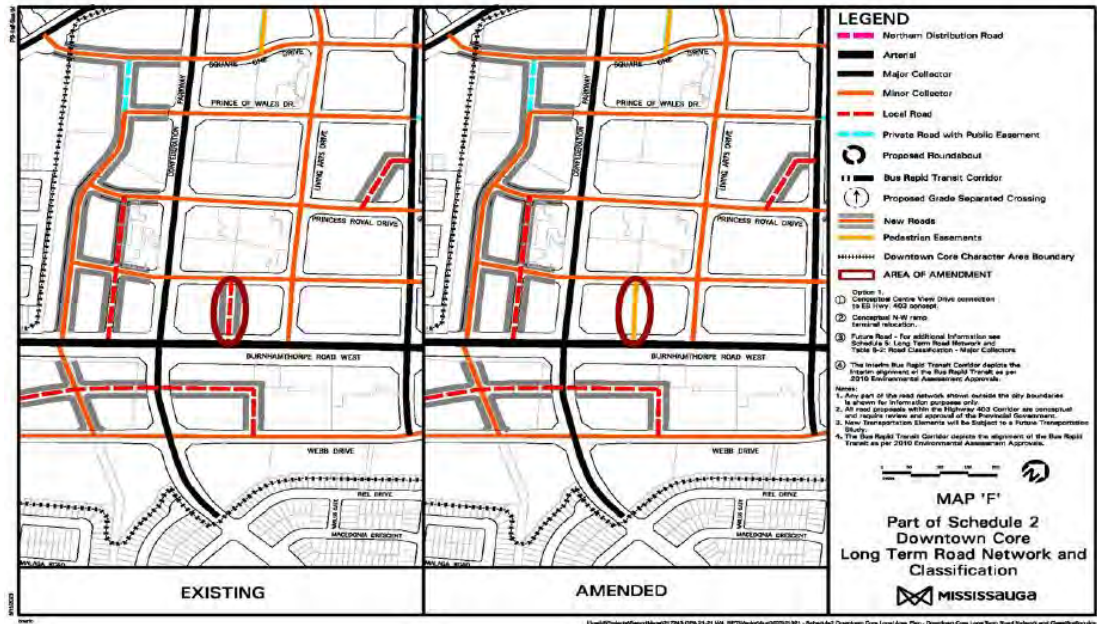
The remainder of this letter details the background and reasons for these requests.

1.0 Application History and OPA Approval

On November 26, 2021, Holborn Group applied for an Official Plan Amendment to replace the planned/future local road bisecting the Subject Lands with a pedestrian mews/easement by amending the Schedules of the Mississauga Official Plan and the Downtown Core Local Area Plan.

Holborn Group appealed the OPA Application to the Tribunal on August 20, 2022 for a lack of decision within the timeframe under the Planning Act. Holborn Group and the City reached a settlement on the appeal, resulting in the approval of OPA 161 by the Tribunal on September 12, 2023. OPA 161 amends all maps and figures within the Mississauga Official Plan and the Downtown Core Local Area Plan to remove the local road bisecting the Subject Lands. As an example, the proposed road removal is shown in Figure 1.1 below on the OPA 161 amendment to Schedule 2, Downtown Core Long Term Road Network and Classification.

Figure 1.1: OPA 161, Schedule 2, Downtown Core Long Term Road Network and Classification



Further, a Special Site Policy 12.15 was added to identify a proposed stratified public park on the Subject Lands and adding the approximate location of this park to the relevant schedules of the Mississauga Official Plan (which policy has been carried forward in the Draft MOP as Special Site 101).

A copy of the Tribunal's decision approving OPA 161, including the amended maps and schedules, is attached hereto for reference.

2.0 Request

Based on our review, the following Maps from the Draft MOP are still showing the road on the Subject Lands and need to be revised:

- Map 12-2.1: Downtown Core Districts;
- Map 12-2.4: Downtown Core Long Term Transit Network;
- Map 12-2.5: Downtown Core Long Term Street Network and Classification;
- Map 12-2.6: Downtown Core A & B Street Frontage; and
- Map 12-2.7: Downtown Core Retail Activation.

These maps have been provided as an attachment to this letter for ease of reference.

Furthermore, Maps 12-2.4 to 12-2.7, inclusive, should identify a Pedestrian Easement bisecting the Subject Lands, in accordance with OPA 161.

We also note that Map 12-2.2: Conceptual Park and Open Space is not included within the current Mississauga Official Plan or Downtown Core Local Area Plan and as such did not form part of OPA 161. However, in our opinion, it would be appropriate to include the proposed park and pedestrian easement on Map 12-2.2 as well to be consistent with all other maps in the Draft MOP.

3.0 Conclusion

On behalf of our client, we appreciate the opportunity to provide comments on the Draft MOP and look forward to an updated draft that incorporates our comments. We look forward to working with the City on the development of a vibrant downtown.

Should you have any questions, please do not hesitate to contact me.

Yours very truly,
Malone Given Parsons Ltd.

A handwritten signature in blue ink, appearing to be 'LC' or similar initials, enclosed in a light blue rectangular box.

Lauren Capilongo, MCIP, RPP

cc: *Client*
P. DeMelo, Kagan Shastri DeMelo Winer Park Lawyers LLP

Ontario Land Tribunal
Tribunal ontarien de l'aménagement
du territoire



ISSUE DATE: September 12, 2023

CASE NO(S).: OLT-22-004373

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

| | |
|----------------------|---|
| Applicant/Appellant: | RGF (Mississauga) Developments Inc. |
| Subject: | Request to amend the Official Plan – Failure to adopt the requested amendment |
| Description: | To remove the identification of a local road and replacement with a pedestrian mews |
| Reference Number: | OPA 21-21 W4 |
| Property Address: | 325 Burnhamthorpe Road West |
| Municipality/UT: | Mississauga/Peel |
| OLT Case No: | OLT-22-004373 |
| OLT Lead Case No: | OLT-22-004373 |
| OLT Case Name: | RGF (Mississauga) Developments Inc. v. Mississauga (City) |

Heard: August 9, 2023 by Video Hearing

APPEARANCES:

Parties

Counsel

| | |
|-------------------------------------|-----------|
| RGF (Mississauga) Developments Inc. | P. DeMelo |
|-------------------------------------|-----------|

| | |
|---------------------|--|
| City of Mississauga | A. Whyte L. Magi (<i>in absentia</i>) |
|---------------------|--|

MEMORANDUM OF ORAL DECISION DELIVERED BY P. TOMILIN ON AUGUST 9, 2023 AND ORDER OF THE TRIBUNAL

[Link To Order](#)

INTRODUCTION

[1] This was a hearing with respect to the appeal by RGF (Mississauga) Developments Inc. (“Applicant” / “Appellant”) from the failure of the City of Mississauga (“City”) to make a decision on an application for an Official Plan Amendment (“OPA”), pursuant to s. 22(7) of the *Planning Act* (“Act”), for the property located at 325 Burnhamthorpe Road West (“Site” / “subject property”). The Parties have resolved their issues.

[2] The purpose and effect of the OPA is to amend Schedule 10 of the City’s Official Plan, and Schedules 1-5 of the Downtown Core Local Area Plan by replacing the planned local road with a pedestrian easement (“mews”).

[3] Lauren Capilongo, a Registered Professional Planner, provided a Sworn Affidavit (Exhibit 1) and was qualified by the Tribunal to provide land use planning opinion evidence in relation to the matter under appeal. Ms. Capilongo delivered a detailed contextual and land use planning rationale in support of the settlement.

SITE CONTEXT

[4] The Site has approximately 183 metres (“m”) of frontage along both Burnhamthorpe Road West and City Centre Drive, and approximately 101 m of frontage along both Confederation Parkway and Living Arts Drive, and comprises a total gross floor area of approximately 1.82 hectares (4.51 acres). The subject property is currently occupied by the Mississauga YMCA facility, a three-storey recreation centre on the east side, and by a surface parking lot on the west, and is located within City’s Downtown Core.

SURROUNDING CONTEXT

[5] The Site is surrounded by a variety of residential, commercial, and institutional uses. The subject property is serviced by Mississauga Transit bus routes at the intersection of Burnhamthorpe Road West and Confederation Parkway, and the Square One Bus Terminal.

[6] To the north of the Site are the City Hall, Community Common Park, and residential buildings, some of them still under construction.

[7] To the east are the Hazel McCallion Central Library, Mississauga Celebration Square and Square One Shopping Centre.

[8] To the west are existing high-rise, mixed-use developments.

[9] To the south are commercial and office buildings, existing mixed-use developments and other mixed-use developments that are under construction.

DEVELOPMENT PROPOSAL

[10] The redevelopment plan proposes a two-phase, mixed-use development totalling five (5) high-rise towers, a four -storey underground parking garage, a stratified public park, and a pedestrian mews bisecting the subject property.

[11] Phase One will replace the existing parking lot with three towers built on a six-storey podium, on the western half of the Site.

[12] Phase Two will consist of two towers built on a seven-storey podium, on the eastern part of the subject property.

[13] A pedestrian mews up to 14 m in width will separate two halves of the development, bordering a new 1,822.43 square metres (“m²”) stratified public park. The pedestrian mews will connect Burnhamthorpe Road West and City Centre Drive, and will provide access to building lobbies and divide the proposed development into two blocks, serving as separate phases. The proposed pedestrian mews will be constructed in the second phase of the development, will be publicly accessible and will be subject to an easement agreement registered on Title.

[14] Upon completion, the development will provide a total of 9,041 m² of space for indoor and outdoor amenities.

PROPOSED OPA

[15] Ms. Capilongo explained that the agreement reached between the Appellant and the City, which includes revisions to the OPA to include identification of the proposed stratified public park and a path to revise and resolve the appeal of the Site Plan Approval (“SPA”) application. A new Special Site Policy under s.12.0 of the Downtown Core Local Area Plan (“DLAP”) is proposed to identify the general location, size, and width of the proposed pedestrian mews and the stratified public park.

[16] Ms. Capilongo proffered that no other amendments to the Mississauga Official Plan (“MOP”) or DLAP are necessary to permit the built form, height, density, or massing of the development.

[17] It is her opinion that the replacement of the planned local road with a pedestrian mews respects the overall intent and vision of the MOP and the DLAP by encouraging pedestrian and cyclist access and connectivity with adjacent blocks. She pointed out that the blocks to the north of the subject property do not have existing or planned local roads bisecting those blocks. Thus, in her opinion, it is appropriate to replace the planned local road on the Site with a pedestrian mews.

[18] Ms. Capilongo stated that the proposed development is compatible with the existing surrounding context, and meets the overall intent of provincial, regional, and municipal planning policies, and is supported by the submitted technical studies, which includes a Transportation Impact Study prepared by LEA Consulting, assessing the potential transportation impacts of replacing the planned future road with a pedestrian mews.

PLANNING RATIONALE

[19] The planning documents related to these amendments are s. 2 of the Act, the Provincial Policy Statement, 2020 (“PPS”), the Growth Plan for the Greater Golden Horseshoe, 2019 (“Growth Plan”), the Peel Region Official Plan (“ROP”), the policies of the MOP and DLAP.

[20] The Tribunal accepts the following findings, based on Ms. Capilongo’s uncontroverted evidence.

[21] The proposed development has appropriate regard for the matters of Provincial interest in s. 2 of the Act, is consistent with the PPS, conforms to the ROP, MOP and DLAP and overall, represents good land use planning. For a more detailed report, please see Exhibit 1.

ORDER

[22] **THE TRIBUNAL ORDERS** that the Appeal is allowed in part, and the Official Plan for the City of Mississauga is amended as set out in Schedule 1 to this Order.

[23] The Clerk of the City of Mississauga may format and number the amendments for record-keeping purposes.

"P. Tomilin"

P. TOMILIN
MEMBER

Ontario Land Tribunal

Website: www.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.

SCHEDULE 1

**Amendment No. 161
to
Mississauga Official Plan**

Amendment No. 161
to
Mississauga Official Plan

The following text and Maps "A" to "I" attached constitute Amendment No. 161.

PURPOSE

The purpose of this Amendment is to replace the planned local road with a pedestrian walkway and municipal easement, and add a stratified park and Special Site policy within the subject lands, to facilitate the development of a five tower mixed use development.

LOCATION

The lands affected by this Amendment are located on the north side of Burnhamthorpe Road West, east of Confederation Parkway. The subject lands are located in the Downtown Core 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 designated Downtown Mixed Use with a proposed local road.

An Official Plan Amendment is required to replace the planned local road with a pedestrian walkway and easement to allow for the continuation of the pedestrian news network to Burnhamthorpe Road West. A portion of the subject lands will be redesignated from Downtown Mixed Use and No Designation (local road) to Downtown Mixed Use and Public Open Space, to provide for a stratified park with underground parking below.

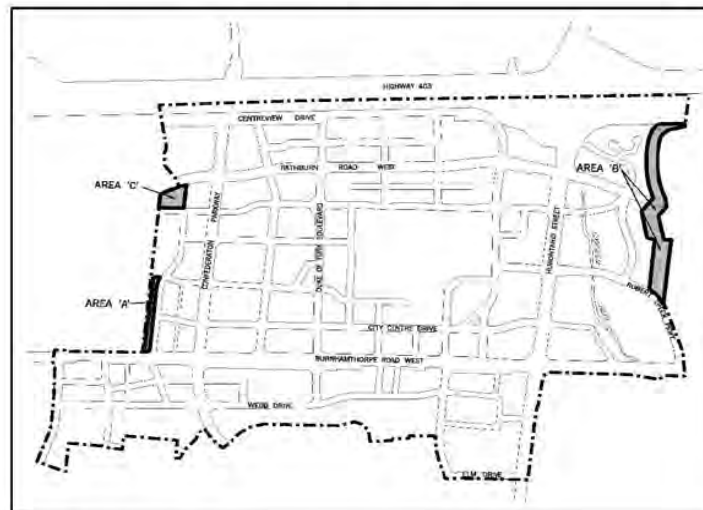
DETAILS OF THE AMENDMENT AND POLICIES RELATIVE THERETO

1. Section 1.0, How to Read the Plan, Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by deleting Map 1: The Downtown Core Local Area and replacing it with the following:



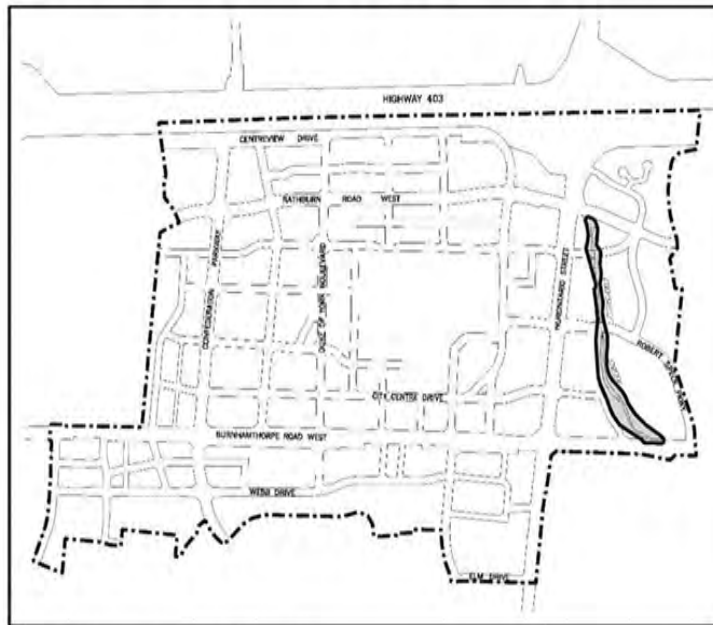
Map 1: The Downtown Core Local Area is located in central Mississauga and is identified in the City Structure as Downtown Core

2. Section 4.3.9, Transition Areas, Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by deleting Map 2: Transition Areas and replacing it with the following:



Map 2: Transition Areas

3. Section 6.2, Cooksville Creek Corridor, Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by deleting Map 3: Cooksville Creek Corridor and replacing it with the following:

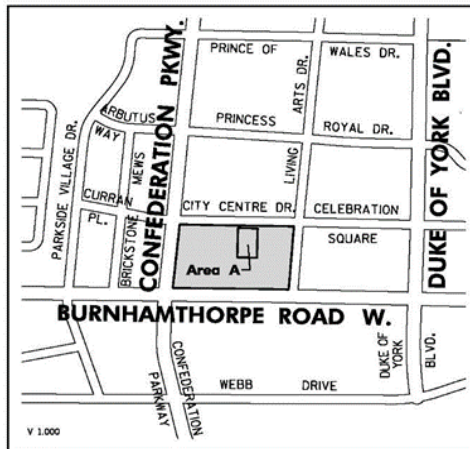


Map 3: Cooksville Creek Corridor

4. Section 12.0, Special Site Policies, Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by adding Special Site 15 on Map 4: Location of Special Sites within the Downtown Local Area Plan, in accordance with the changes to the Special Site Policies.

5. Section 12.0, Special Site Policies, Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by adding the following:

12.15 Site 15



12.15.1 The lands identified as Special Site 15 are located on the north side of Burnhamthorpe Road West, east of Confederation Parkway.

12.15.2 Notwithstanding the policies of this Plan, a stratified public park with a minimum size of 0.182 hectares and a maximum size of 0.243 hectares with underground parking is permitted within the approximate location identified as Area A.

6. Schedule 1, Urban System, of Mississauga Official Plan, is hereby amended by adding lands to the Green System as shown on Map "A" of this Amendment.
7. Schedule 1a, Urban System, Green System, of Mississauga Official Plan, is hereby amended by adding lands to the Green System as shown on Map "B" of this Amendment.
8. Schedule 4, Parks and Open Spaces, of Mississauga Official Plan, is hereby amended by adding lands to the Public and Private Open Spaces as shown on Map "C" of this Amendment.
9. Schedule 10, Land Use Designations, of Mississauga Official Plan, is hereby amended by changing the land use designation of the central portion of the subject lands from Downtown Mixed Use and No Designation (local road) to Downtown Mixed Use and Public Open Space, as shown on Map "D" of this Amendment.

10. Schedule 1, Downtown Core Districts, of the Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by removing the New Roads which bisects the subject lands as shown on Map "E" of this Amendment.
11. Schedule 2, Downtown Core Long Term Road Network and Classification, of the Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by removing the New Local Road which bisects the subject lands and adding Pedestrian Easements as shown on Map "F" of this Amendment.
12. Schedule 3, Downtown Core Long Term Transit Network, of the Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by removing the Road Network which bisects the subject lands and adding Pedestrian Easements as shown on Map "G" of this Amendment.
13. Schedule 4, Downtown Core A & B Street Frontage, of the Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by removing the 'B' Street which bisects the subject lands and adding Pedestrian Easements as shown on Map "H" of this Amendment.
14. Schedule 5, Downtown Core Retail Activation, of the Downtown Core Local Area Plan, of Mississauga Official Plan, is hereby amended by removing the New Roads which bisects the subject lands and adding Pedestrian Easements as shown on Map "I" of this Amendment.

IMPLEMENTATION

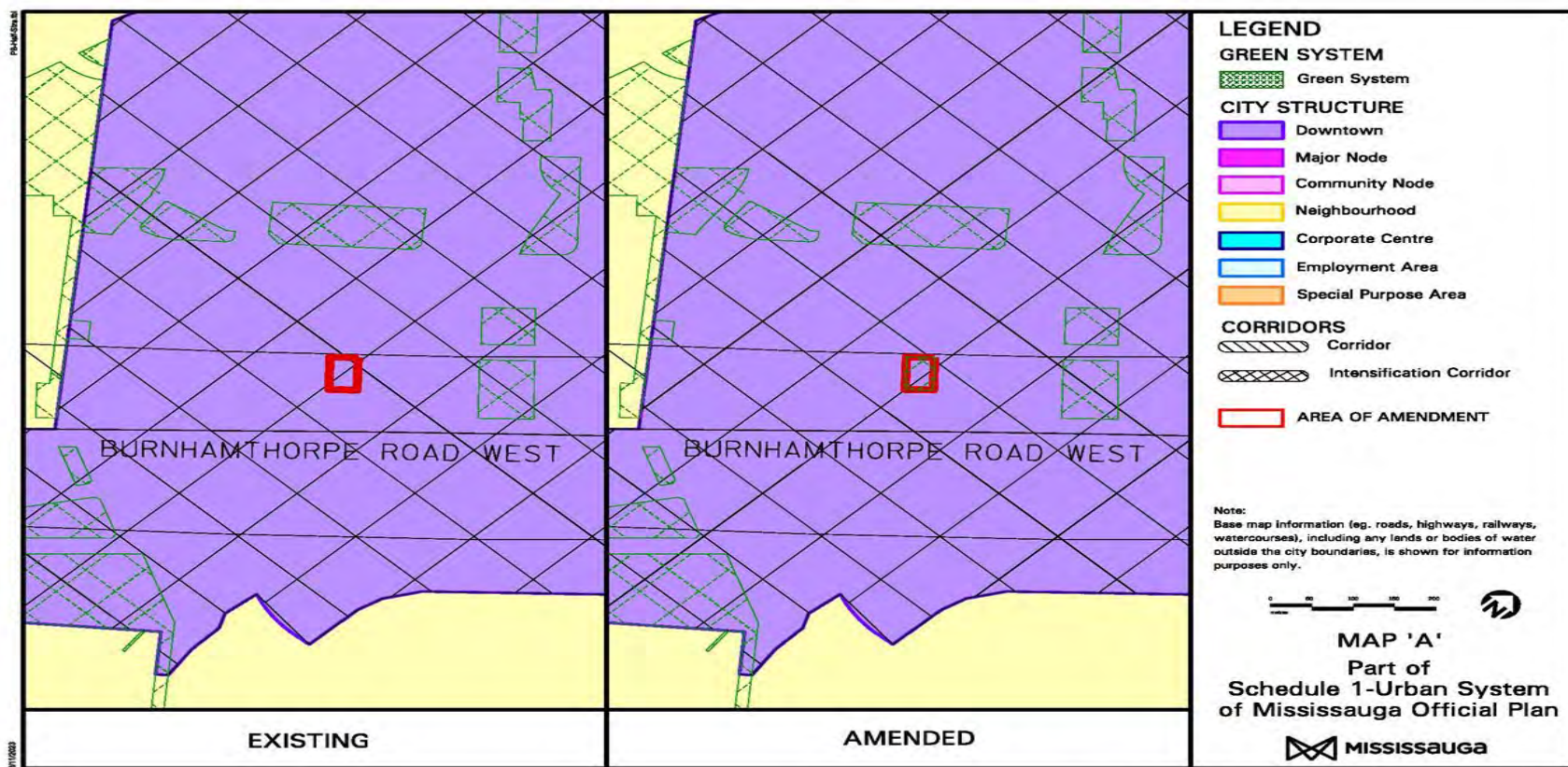
Upon receipt of the Ontario Land Tribunal's Final Order, Mississauga Official Plan will be amended in accordance with the Order.

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

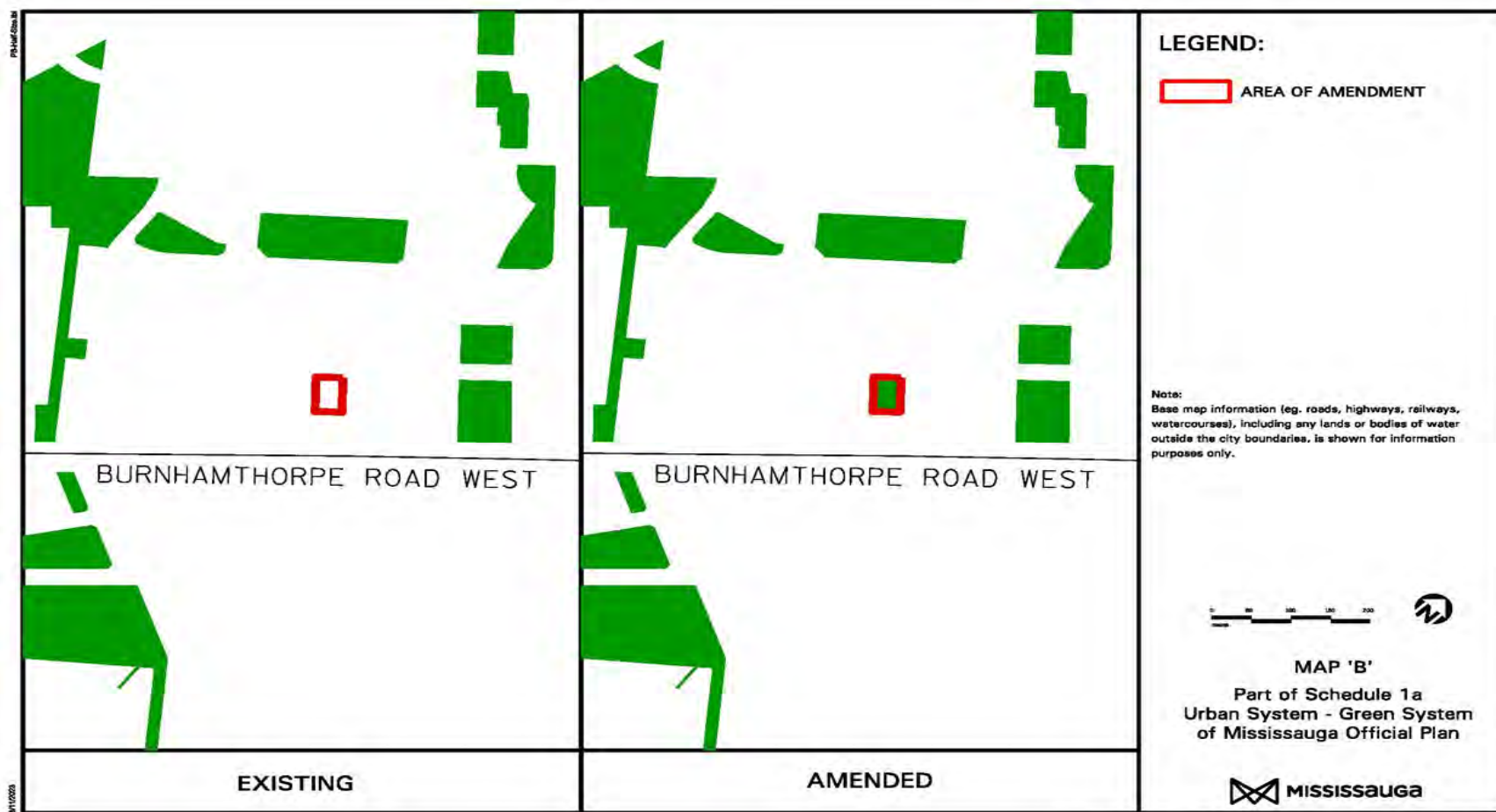
INTERPRETATION

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.



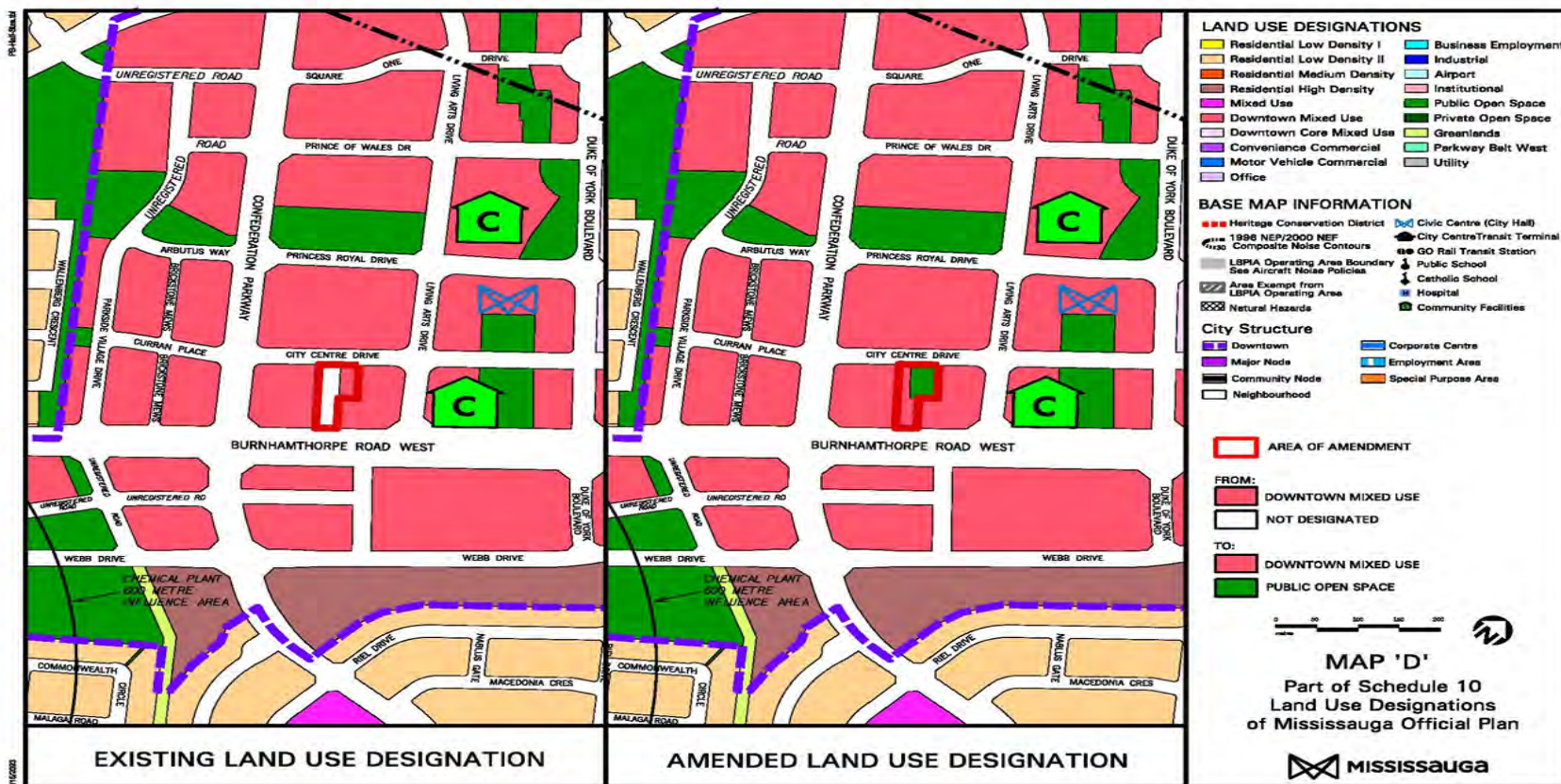
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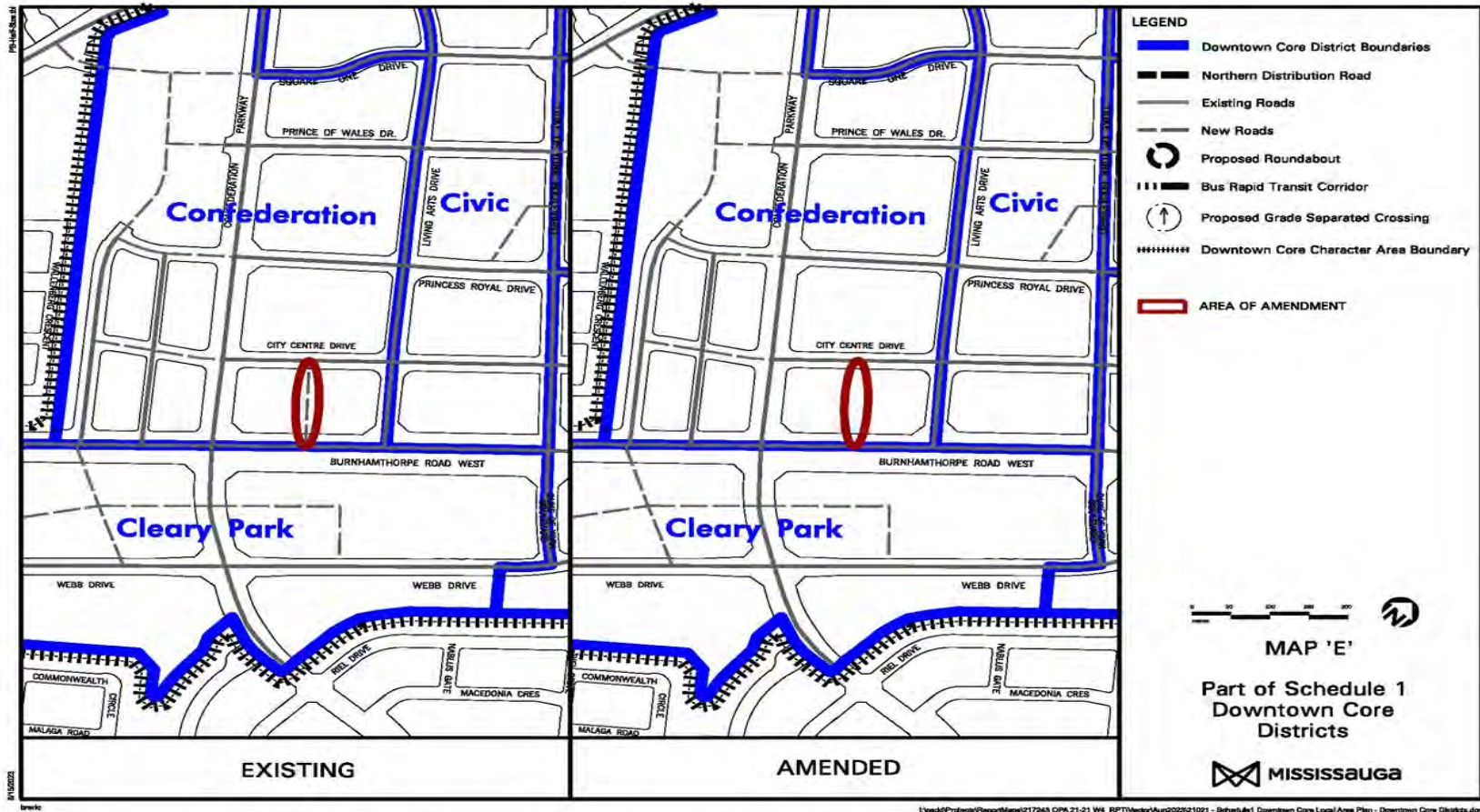


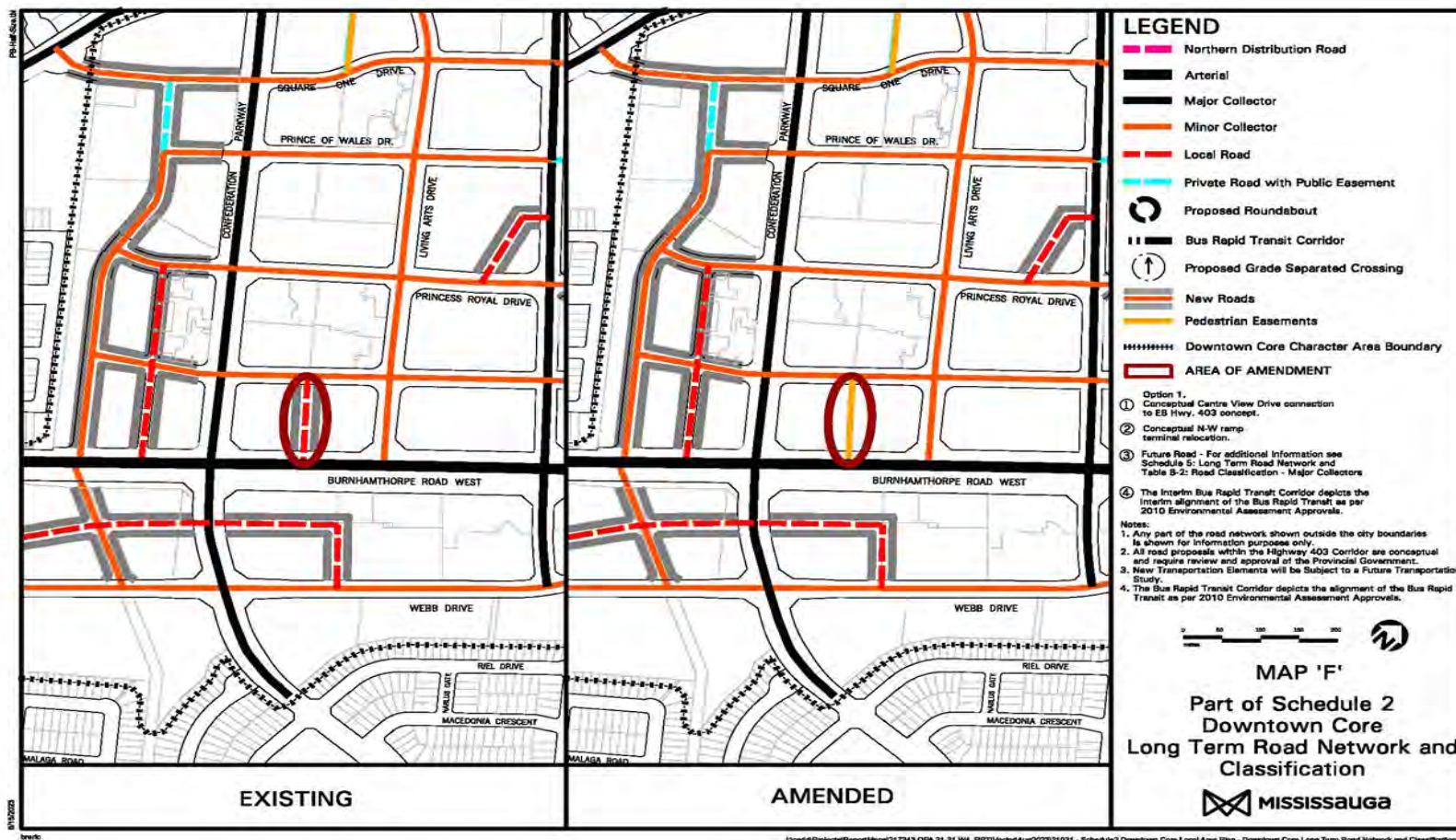
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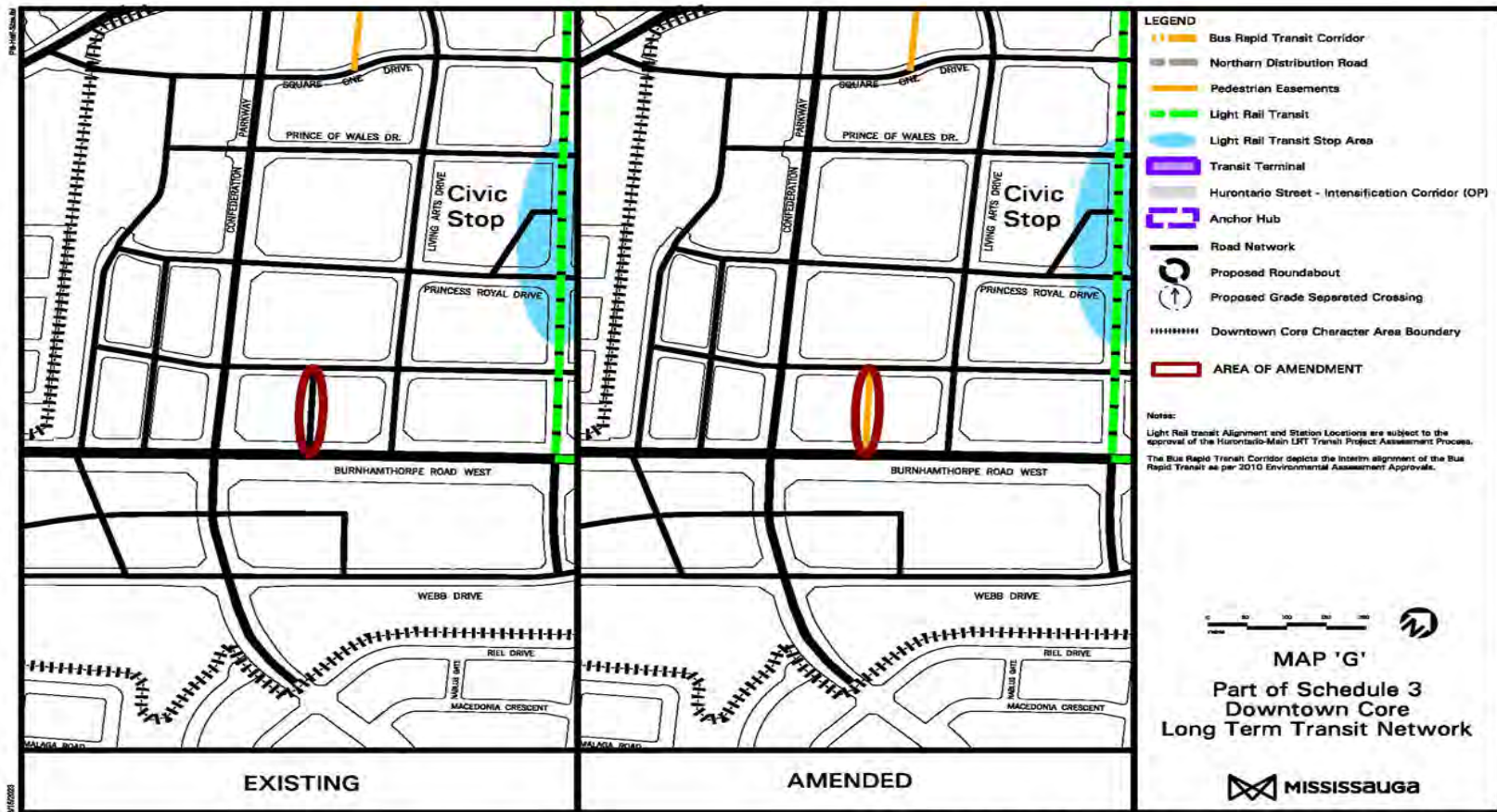




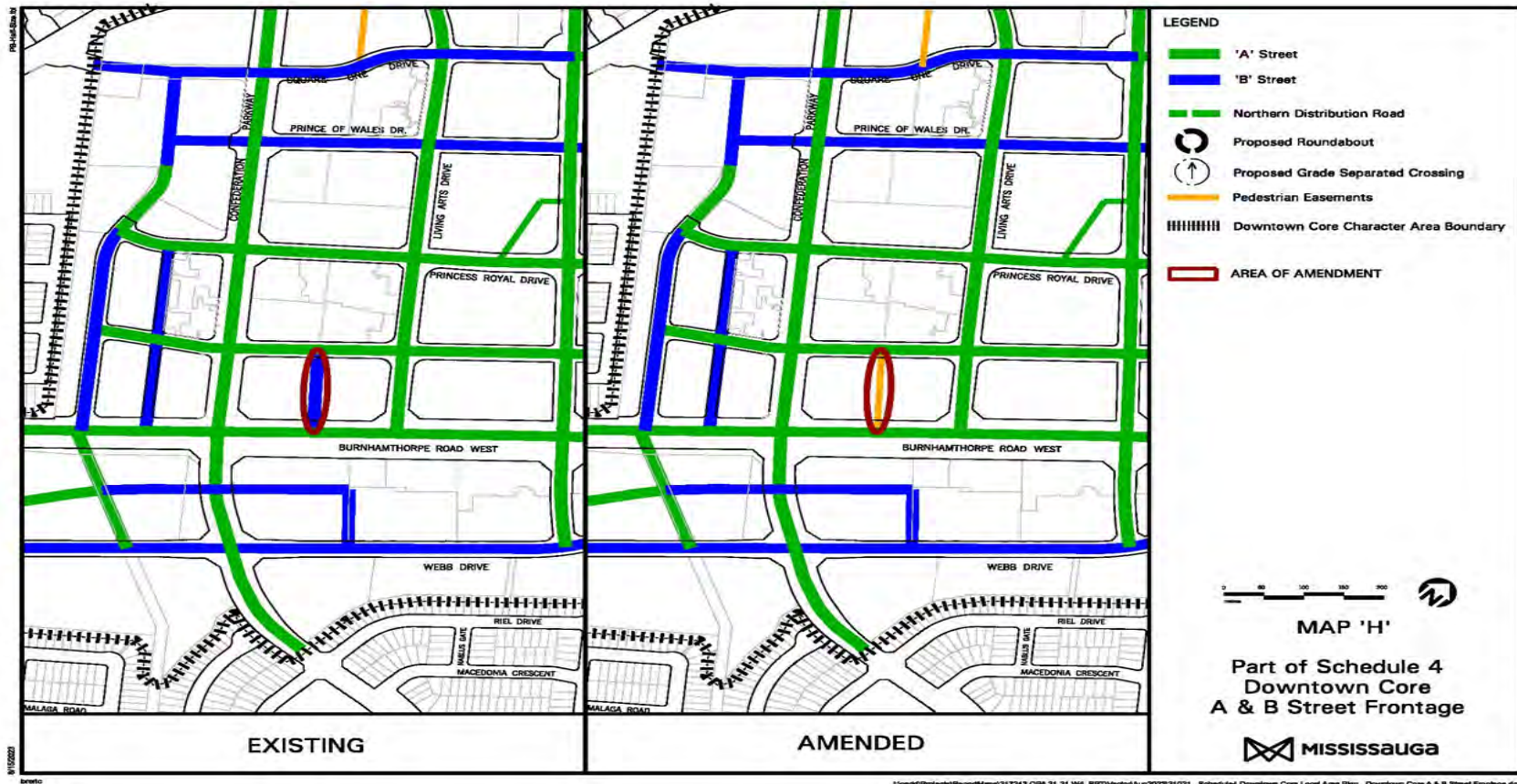


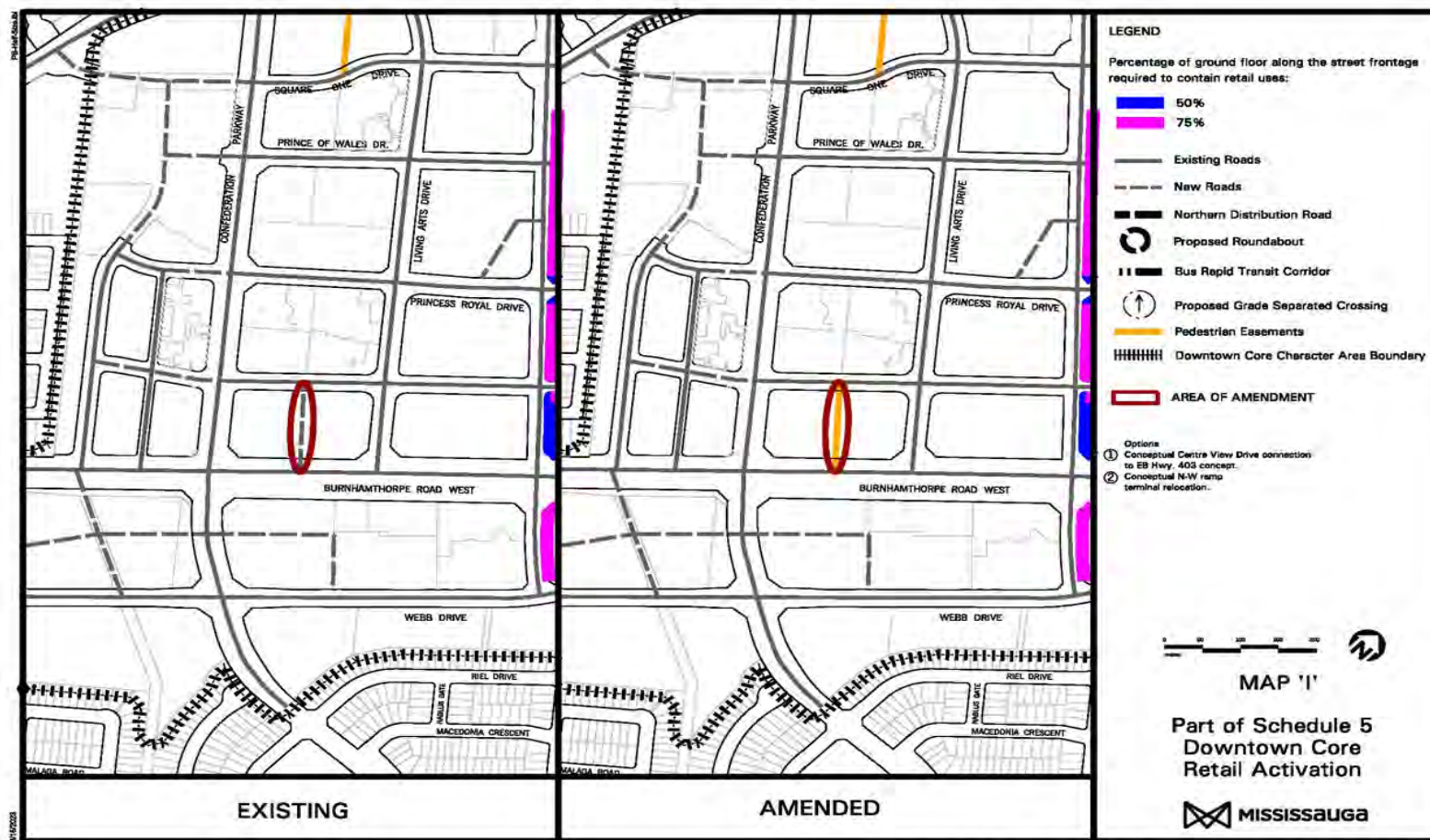


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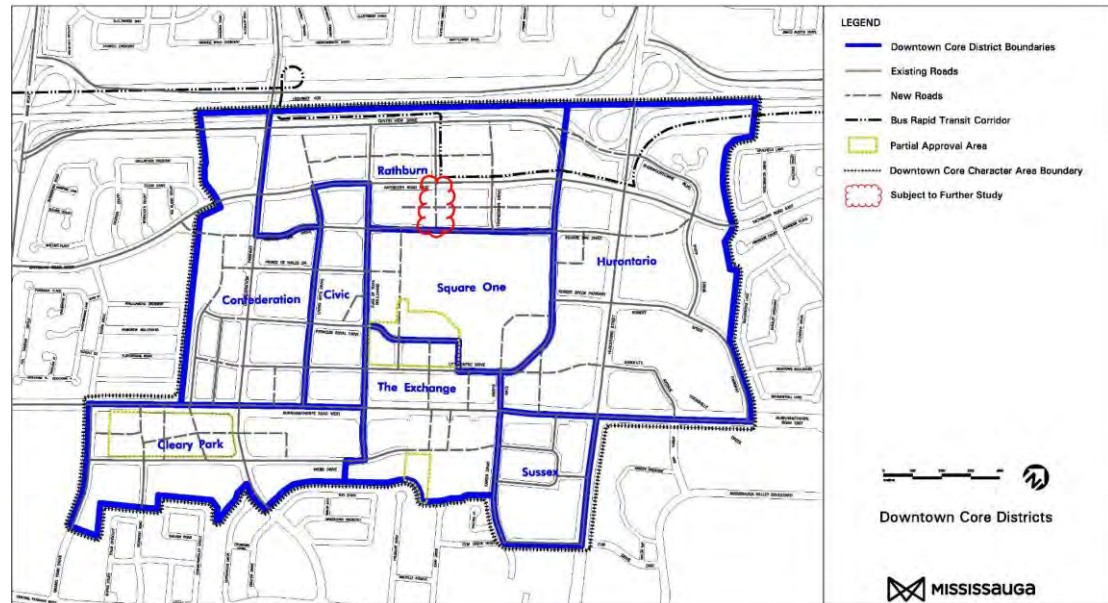


I:\work\Projects\Report\Map\217343 CPA 21-21 HW_0PT1\Vector\Aug2022\21021 - Schedules Downtown Core Local Area Plan - Downtown Core Retail Activation.dgn

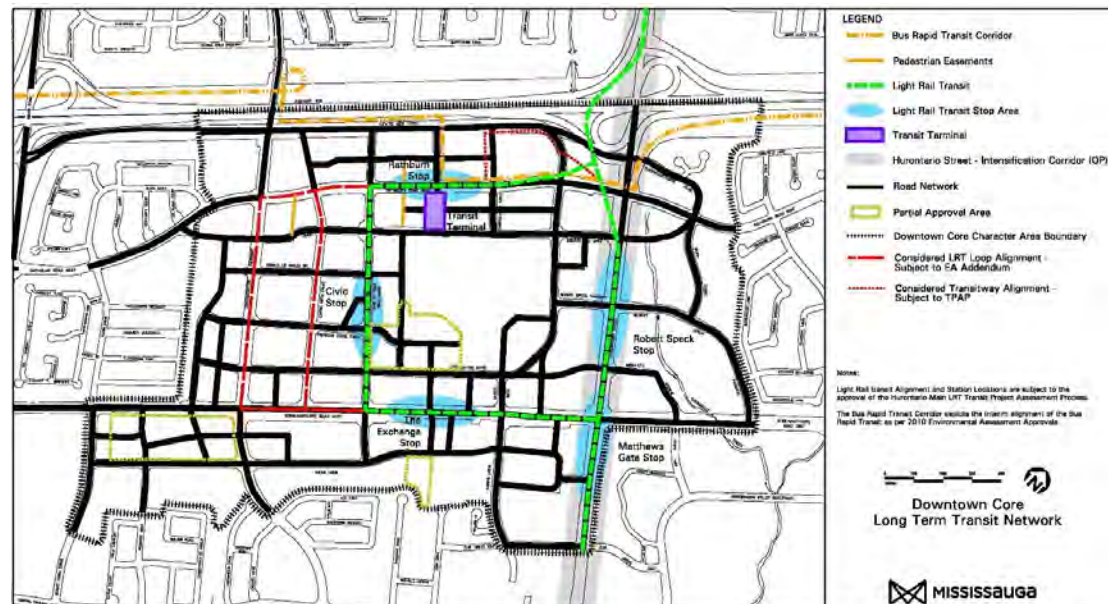
ATTACHMENT 2

Excerpts of Draft MOP Maps incorrectly showing the Local Road on the Subject Lands

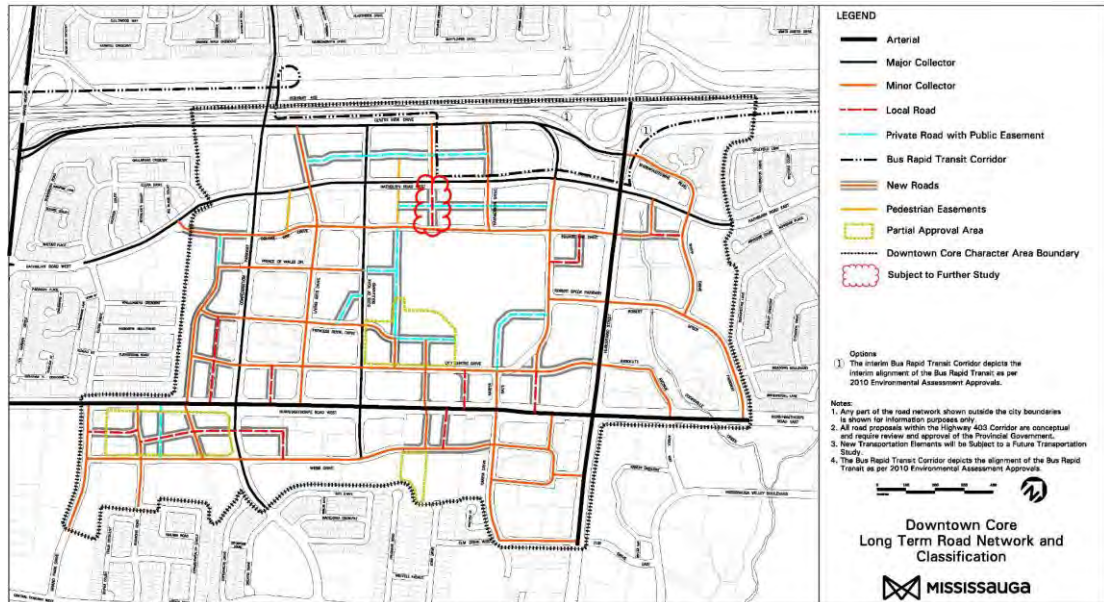
Map 12-2.1: Downtown Core Districts



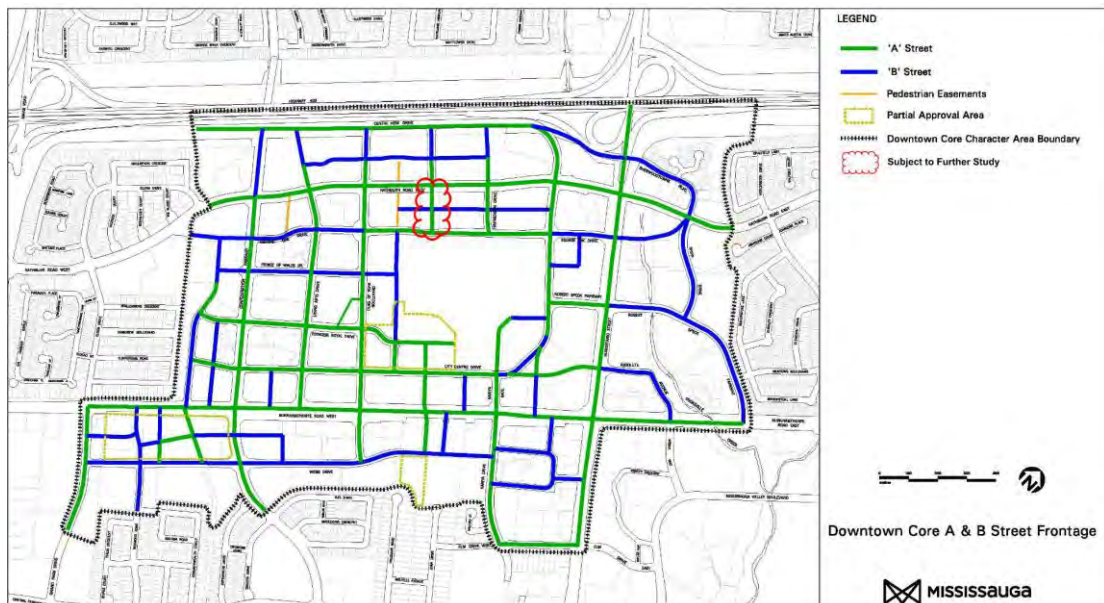
Map 12-2.4: Downtown Core Long Term Transit Network



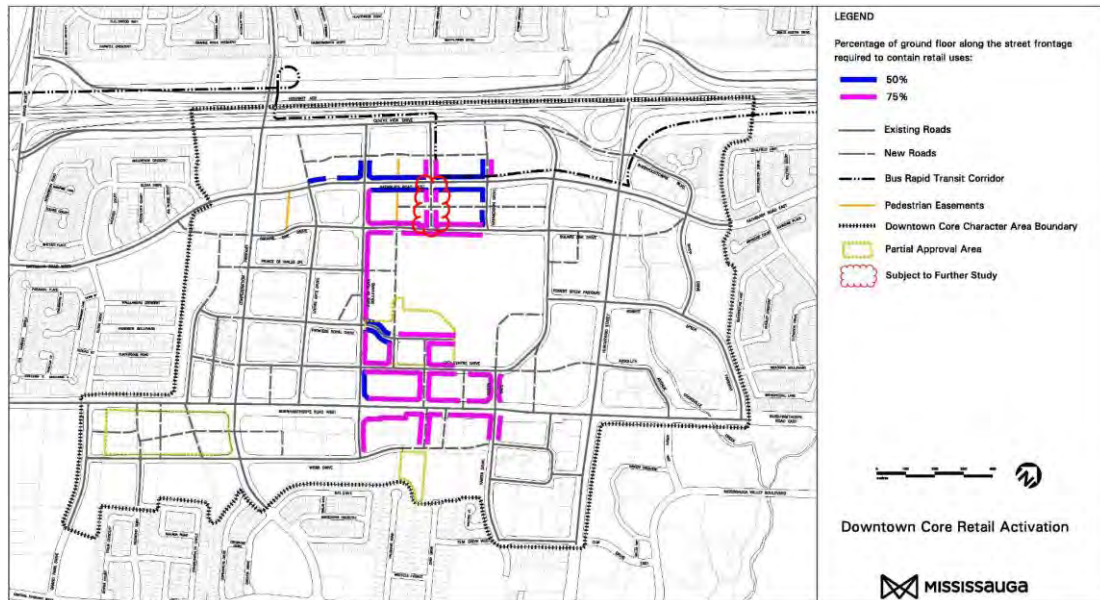
Map 12-2.5: Downtown Core Long Term Street Network and Classification



Map 12-2.6: Downtown Core A & B Street Frontage



Map 12-2.7: Downtown Core Retail Activation



February 12, 2025

Our File No.: 202722

Via Email (official.plan@mississauga.ca)

City of Mississauga
300 City Centre Drive
Mississauga, ON L5B 0C3

Attention: Amina Menkad and Ben Phillips

Dear Sirs/Mesdames:

**Re: Draft Mississauga Official Plan 2051
Comments on behalf of Calloway REIT (Mississauga) Inc. and First South Common
Shopping Centres Limited
Inappropriate Implementation of OPA 115**

We are counsel to Calloway REIT (Mississauga) Inc. and First South Common Shopping Centres Limited in respect of the lands known municipally in the City of Mississauga as 2150 Burnhamthorpe Road West (the “**Property**”). We write on behalf of our clients to express concerns with certain aspects of the Draft Mississauga Official Plan 2051 (the “**Draft OP**”), and particularly its failure to implement the Ontario Land Tribunal (the “**Tribunal**”) decision regarding Official Plan Amendment No. 115 (“**OPA 115**”) (OLT Case No. OLT-22-002285).

Background

The Property, which is currently the site of the South Common Centre, is located in the South Common Community Node under the in-effect City of Mississauga Official Plan.

In 2020, the City adopted OPA 115 to introduce certain policies that would apply to Community Nodes (and certain Major Nodes), including the Node in which the Property is located. OPA 115 included policies requiring a minimum of 10% of housing units be provided as affordable housing (the “**Affordable Housing Policies**”). OPA 115 also included other policy direction with respect to built form, uses and other matters.

Our clients, among other landowners, appealed OPA 115 to the Tribunal. After a full hearing, the Tribunal determined the Affordable Housing Policies are beyond the City’s legal authority to adopt, and are therefore illegal (the “**Tribunal Decision**”). The City filed a review request of the Tribunal decision, which was dismissed. The City has also sought leave to appeal the Tribunal Decision; a decision on that leave motion has not yet been made.

Regardless of the City's efforts to challenge the Tribunal Decision, no stay of that decision has been sought or granted. Accordingly, the Tribunal decision remains in effect, and the Affordable Housing Policies are illegal.

As part of the OPA 115 appeal, the Tribunal also modified certain other policy direction applicable to the Nodes, pursuant to a settlement between the appellants and the City.

The Draft OP

The Affordable Housing Policies

In reviewing the Draft OP, we were surprised to see the very same Affordable Housing Policies the Tribunal has determined to be illegal included in the policies pertaining to the South Common Growth Node (see policies 14.2.11.5.1 and 14.2.11.5.3 to 14.2.11.5.6). As outlined above, the Tribunal Decision remains in effect. Accordingly, the policies noted above are beyond the City's jurisdiction and must be removed from the Draft OP.

Policy 14.2.6.10.7

Our review also revealed another issue with the Draft OP vis-à-vis the OPA 115 proceedings. Policy 14.2.11.10.7 provides that applications proposing densities above the permitted maximum will be required to demonstrate how the maximum density will not be exceeded across the Node and may be required to enter into a development agreement and include lower density lands in the development proposal.

An identical policy was included in OPA 115. As part of the settlement of that appeal, the City agreed to delete the policy, and the Tribunal approved that modification. It is inappropriate to attempt to re-insert that policy in the Draft OP, and thereby undermine one aspect of the settlement package that formed the basis of the appellants' agreement to resolve OPA 115 without a hearing. This policy must be deleted.

We note that policy 14.2.11.10.7 includes an outdated reference to the maximum density included in the adopted version of OPA 115 (2.25 FSI) rather than the maximum density in the approved version of OPA 115 (3.75 FSI). The 3.75 FSI maximum is carried forward into the Draft OP in policy 14.2.11.3.4. This discrepancy suggests that the inclusion of policy 14.2.11.10.7 in the Draft OP at all may be a clerical error. Again, policy 14.2.11.10.7 must be deleted. If the City intends to maintain the policy (to which approach our clients would object), the incorrect density reference must be updated.



We appreciate staff and Council's consideration of this letter. Please include us in all notices with respect to this matter.

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read "Max Laskin", written over a light blue rectangular background.

Max Laskin
Partner
ML

cc: Clients
David Bronskill
Andrew Biggart and Kacie Layton, Counsel to the City in respect of OPA 115

1404-2813-5954

February 12, 2025

Our File No.: 202722

Via Email (official.plan@mississauga.ca)

City of Mississauga
300 City Centre Drive
Mississauga, ON L5B 0C3

Attention: Amina Menkad and Ben Phillips

Dear Sirs/Mesdames:

**Re: Draft Mississauga Official Plan 2051
Comments on behalf of First Capital (Meadowvale) Corporation
Inappropriate Implementation of OPA 115**

We are counsel to First Capital (Meadowvale) Corporation in respect of the lands known municipally in the City of Mississauga as 6667 Meadowvale Town Centre (the “**Property**”). We write on behalf of our clients to express concerns with certain aspects of the Draft Mississauga Official Plan 2051 (the “**Draft OP**”), and particularly its failure to implement the Ontario Land Tribunal (the “**Tribunal**”) decision regarding Official Plan Amendment No. 115 (“**OPA 115**”) (OLT Case No. OLT-22-002285).

Background

The Property, which is currently the site of the Meadowvale Town Centre, is located in the Meadowvale Community Node under the in-effect City of Mississauga Official Plan.

In 2020, the City adopted OPA 115 to introduce certain policies that would apply to Community Nodes (and certain Major Nodes), including the Node in which the Property is located. OPA 115 included policies requiring a minimum of 10% of housing units be provided as affordable housing (the “**Affordable Housing Policies**”). OPA 115 also included other policy direction with respect to built form, uses and other matters.

Our client, among other landowners, appealed OPA 115 to the Tribunal. After a full hearing, the Tribunal determined the Affordable Housing Policies are beyond the City’s legal authority to adopt, and are therefore illegal (the “**Tribunal Decision**”). The City filed a review request of the Tribunal decision, which was dismissed. The City has also sought leave to appeal the Tribunal Decision; a decision on that leave motion has not yet been made.

Regardless of the City's efforts to challenge the Tribunal Decision, no stay of that decision has been sought or granted. Accordingly, the Tribunal decision remains in effect, and the Affordable Housing Policies are illegal.

As part of the OPA 115 appeal, the Tribunal also modified certain other policy direction applicable to the Nodes, pursuant to a settlement between the appellants and the City.

The Draft OP

The Affordable Housing Policies

In reviewing the Draft OP, we were surprised to see the very same Affordable Housing Policies the Tribunal has determined to be illegal included in the policies pertaining to the Meadowvale Growth Node (see policies 14.2.6.5.1 and 14.2.6.5.3 to 14.2.6.5.6). As outlined above, the Tribunal Decision remains in effect. Accordingly, the policies noted above are beyond the City's jurisdiction and must be removed from the Draft OP.

Policy 14.2.6.10.7

Our review also revealed another issue with the Draft OP vis-à-vis the OPA 115 proceedings. Policy 14.2.6.10.7 provides that applications proposing densities above the permitted maximum will be required to demonstrate how the maximum density will not be exceeded across the Node and may be required to enter into a development agreement and include lower density lands in the development proposal.

An identical policy was included in OPA 115. As part of the settlement of that appeal, the City agreed to delete the policy, and the Tribunal approved that modification. It is inappropriate to attempt to re-insert that policy in the Draft OP, and thereby undermine one aspect of the settlement package that formed the basis of the appellants' agreement to resolve OPA 115 without a hearing. This policy must be deleted.

We note that policy 14.2.6.10.7 includes an outdated reference to the maximum density included in the adopted version of OPA 115 (2.25 FSI) rather than the maximum density in the approved version of OPA 115 (3.75 FSI). The 3.75 FSI maximum is carried forward into the Draft OP in policy 14.2.6.3.4. This discrepancy suggests that the inclusion of policy 14.2.6.10.7 in the Draft OP at all may be a clerical error. Again, policy 14.2.6.10.7 must be deleted. If the City intends to maintain the policy (to which approach our client would object), the incorrect density reference must be updated.



We appreciate staff and Council's consideration of this letter. Please include us in all notices with respect to this matter.

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read "Max Laskin", written over a light blue rectangular background.

Max Laskin

Partner

ML

cc: Clients

David Bronskill

Andrew Biggart and Kacie Layton, Counsel to the City in respect of OPA 115

1406-8634-7538

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

February 13, 2025
File 6246-5

Attn: Amina Menkad and Ben Phillips

**RE: Draft Mississauga Official Plan 2051
5787 Hurontario Street and 20 Traders Boulevard
Related File No.: 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. There is an existing hotel (Hyatt Place) and the Luxe Convention Centre located on the west portion of the Site, along with associated parking areas. In accordance with the in-force City of Mississauga Official Plan (“OP”), the Subject Lands are split designated as *Office* and *Business Employment* 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 all comments from City Staff and commenting agencies have been received. 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 to create a reciprocal access easement. We are currently working towards addressing the SPA comments to file a resubmission and proceed to the COA.

We understand that the City of Mississauga is undertaking an Official Plan Review (“OPR”) process and intends to bring forward a final version of the Draft Mississauga Official Plan (“Draft OP”) at the end of March 2025. We have reviewed the Draft OP dated January 2025 as it relates to the Subject Lands. In accordance with the Draft OP, the Subject Lands remain within the *Gateway Corporate Centre Employment Area* and are now exclusively designated *Business Employment*. It is noted that the Business Employment designation permits overnight accommodation. Draft Map 16-8 (Gateway Corporate Centre Employment Area Special Permission Areas) also identifies the Subject Lands as within a “Special Permission Areas”, and in accordance with Policy 16.10.2, overnight accommodation is permitted within the Special Permission Areas. It is our understanding, through discussions with City Staff, that the intent of the Special Permission Areas’ policies is to allow for uses that do not meet the *Planning Act* definition of Area of Employment under the Official Plan. We are supportive of the Special Permission Areas’ policies, permitting overnight accommodation on the

Subject Lands, and request that the policies are carried into the final Official Plan. In addition to the Site being within a Special Permission Areas, the Draft OP includes policies to permit uses excluded from the list of permitted uses for an Area of Employment as defined under the *Planning Act*, provided the use has been lawfully established on the parcel of land before October 20, 2024. It is noted that the existing hotel on the Subject Lands existed prior to October 20, 2024, and is therefore lawfully established.

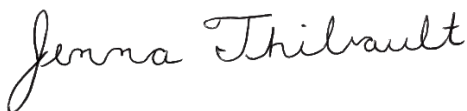
The landowner has an interest in continuing to monitor and participate in the ongoing OPR process to review policy changes as it relates to the Subject Lands. We request to continue to be notified on behalf of the landowner of the release of any draft polices, meetings, reports, and/or decisions as it relates to the OPR process. 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.
Ryan Guetter, Weston Consulting

City Planning Strategies Division
City of Mississauga
300 City Centre Drive
Mississauga, ON
L5B 3C1

November 14, 2025
File No. 12109

Attn: Amina Menkad, Project Lead

**Re: City of Mississauga Official Plan Review
6035 Creditview Road, City of Mississauga**

Weston Consulting is the planning consultant for 1945249 Ontario Inc., the owner of the property municipally known as 6035 Creditview Road in the City of Mississauga (herein referred to as the “subject property”). Weston Consulting has been monitoring the City of Mississauga’s Official Plan Review (“OPR”) process on behalf of the owner. We understand that updates to the draft Mississauga Official Plan have been undertaken to ensure that the New Mississauga Official Plan 2051 is consistent with the Provincial Planning statement that came into effect on October 20, 2024. The purpose of this Letter is to provide formal comments on the City of Mississauga’s OPR and the January 2025 Draft Official Plan (herein referred to as “draft Official Plan”) that was released for review and comment.

Description of the Subject Property

The subject property is located on the northeast corner of the Creditview Road and Britannia Road West intersection and is currently occupied by a gas station (Petro-Canada & Car Wash). The subject property is surrounded by primarily low-density residential uses, with commercial uses to the north and east. The subject property has an approximate area of 0.42 hectares (1.03 acres) and approximate frontage of 52.99 metres along Britannia Road West and 48.58 metres along Creditview Road.

The current City of Mississauga Official Plan (2024 Office Consolidation) designates the subject property as *Motor Vehicle Commercial*. The City of Mississauga Zoning By-law –225-2007 zones the subject property as *Motor Vehicle Commercial (C5)*.

Draft City of Mississauga Official Plan (January 2025)

The City of Mississauga has released a draft Official Plan and is accepting feedback as part of their Official Plan Review process. We understand that comments provided as part of this process will be compiled and reviewed as modifications are made to this draft policy framework. We have reviewed the draft policies as they relate to the subject property and ask that our comments be considered as part of the review process.

The draft Official Plan identifies the subject property as being located within the East Credit Neighbourhood (Schedule 1 – City Structure) and designates the subject property as *Motor Vehicle*

Commercial (Schedule 7 – Land Use Designations). The intent of the *Motor Vehicle Commercial* land use designation is to accommodate a variety of motor vehicle related services, while maintaining compatibility with the surrounding uses. Retail stores and take-out restaurants, including those with drive-through facilities, are permitted as secondary or accessory uses to the main motor vehicle services.

The draft Official Plan identifies Creditview Road and Britannia Road West as Neighbourhood Arterial Roads (Schedule 3 – Long Term Street Network). Additionally, Britannia Road West is identified as a Transit Priority Corridor (Schedule 4 – Long Term Transit Network). Higher densities are encouraged to be located along Neighbourhood Arterials. Development along these roads is to be compact, transit-oriented, and contextually appropriate to the surrounding neighborhood.

The lands adjacent to the subject property are designed as *Mixed Use* (Schedule 7 – Land Use Designations) forming part of a larger block intended for a broad mix and range of uses. The intent of the *Mixed Use* designation is to provide for complete communities that integrate residential, commercial, and service-oriented uses. The subject property is the only site within the block that is not designated *Mixed Use*.

It is our opinion that the draft Official Plan should designate the subject property as *Mixed Use* to allow for a cohesive block that optimizes land use and contributes to a more integrated neighbourhood. This would enable a broader range of compatible uses, preserving the subject property's commercial character while allowing for residential, retail, office, and service uses. This flexibility would support the creation of a more vibrant and complete community, aligning with the City's goals of compact, transit-friendly development.

The current *Motor Vehicle Commercial* designation limits the subject property's potential for long-term redevelopment. By redesignating the property to *Mixed Use*, the site would be better positioned to accommodate future growth. Reconsidering the property's potential within the mixed-use block and the broader surrounding neighbourhood will ensure that the needs of the community are met both now and in the future. Given that the adjacent lands are already designated *Mixed Use*, this redesignation would ensure consistency and contribute to the overall cohesion of the area. Redesignating the subject property would be in line with the Guiding Principles of the draft Official Plan and the City's intentions to appropriately plan for long term land use, growth and development.

Conclusion

The draft Official Plan needs to be revised to reflect the mixed-use redevelopment potential of the block, maximizing the potential of the subject property and maintaining the redevelopment potential at the intersection of Creditview Road and Britannia Road West.

As a follow up to this submission, we ask that a meeting be arranged by City Staff to further discuss these comments, to ensure that the required revisions are captured prior to the Official Plan proceeding

to Council for adoption. Weston Consulting requests notice of any future Public Meetings, Council Meetings, Staff Reports, draft Official Plan documents and/or decisions related to the Official Plan Review process and reserves the right to provide further comments.

Thank you for the opportunity to provide this submission. Please contact the undersigned (extension 512 respectively) if you have any questions.

Yours truly,

Weston Consulting

Per:



Bryanne Robinson, MPL, MCIP, RPP
President

- c. Client
Ryan Guetter, Weston Consulting

City Planning Strategies Division
City of Mississauga
300 City Centre Drive
Mississauga, ON
L5B 3C1

November 14, 2025
File No. 12033

Attn: Amina Menkad, Project Lead

**Re: City of Mississauga Official Plan Review
796 Burnhamthorpe Road West, City of Mississauga**

Weston Consulting is the planning consultant for Sarraino Holdings Limited, the owner of the property municipally known as 796 Burnhamthorpe Road West in the City of Mississauga (herein referred to as the “subject property”). Weston Consulting has been monitoring the City of Mississauga’s Official Plan Review (“OPR”) process on behalf of the owner. We understand that updates to the draft Mississauga Official Plan have been undertaken to ensure that the New Mississauga Official Plan 2051 is consistent with the Provincial Planning Statement (“2024 PPS”) that came into effect on October 20, 2024. The purpose of this Letter is to provide formal comments on the City of Mississauga’s OPR and the January 2025 Draft Official Plan (herein referred to as “draft Official Plan”) that was released for review and comment.

Description of the Subject Property

The subject property is located on the southeast corner of Burnhamthorpe Road West and Wolfedale Road, and is currently occupied by stand-alone commercial uses consisting of three low-rise commercial buildings, including a McDonald’s restaurant, a walk-in clinic, and a dental office, with an associated parking area. The surrounding neighbourhood generally consists of a mix of low-rise commercial, industrial and residential uses. The subject property has an approximate area of 0.744 hectares (1.84 acres), with an approximate frontage of 49.67 metres along Burnhamthorpe Road West and approximately 102.01 metres of frontage along Wolfedale Road.

The current City of Mississauga Official Plan (2024 Office Consolidation) identifies the subject property as being located within the Mavis-Erindale Employment Area (Schedule 9 – Character Areas) and is designated as *Mixed Use* (Schedule 10 – Land Use Designation). The City of Mississauga Zoning By-law 0225-2007 zones the subject property as *General Commercial (C3-1)*.

Draft City of Mississauga Official Plan (January 2025)

Employment Area and Land Use Designation

The City of Mississauga has released a draft Official Plan and is accepting feedback as part of their Official Plan Review process. We understand that comments provided as part of this process will be

compiled and reviewed as modifications are made to this draft policy framework. We have reviewed the draft policies as they relate to the subject property and ask that our comments be considered as part of the review process.

The 2024 PPS defines Employment Area as *“those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.”*

Employment Area is identified as a Provincial Policy term in the draft Official Plan (Glossary 18-3), and it is our understanding that the draft Official Plan relies on the definition of Employment Area outlined in the 2024 PPS. The definition of Employment Area under the 2024 PPS narrows the list of permitted uses, explicitly excluding institutional and commercial uses not related to manufacturing, warehousing, or research and development, unless they have been lawfully established and recognized as such in an Official Plan.

The draft Official Plan identifies the subject property as being located within the Mavis-Erindale Employment Area (Schedule 1 – City Structure) and designates the subject property as *Mixed Employment* (Schedule 7 – Land Use Designations). According to the draft policies, the Mavis-Erindale Employment Area is an employment cluster, intended to provide employment uses in proximity to rail and major transportation infrastructure. Our understanding of the intent of the *Mixed Employment* designation is to provide areas where employment supportive uses, such as retail, service and restaurants, were established as stand-alone uses to serve workers of the Employment Area.

The subject property is currently occupied by standalone commercial uses. Although these uses continue to be permitted through the draft Official Plan as ancillary to primary employment uses, they are not considered to be employment uses as defined by the *Planning Act* and the 2024 PPS and do not function as traditional employment uses. Additionally, the *Mixed Employment* designation permits a diverse range of uses that fall outside of the Province’s definition of Employment Areas. It is our opinion that the Subject Property no longer aligns with the intent of an Employment Area as set forth in the 2024 PPS and therefore should not be included in the Mavis-Erindale Employment Area.

The subject property is underutilized and the existing commercial uses do not significantly contribute to the Employment Area in terms of jobs but do provide a supportive role for the Employment Area and the adjacent residential neighborhoods. Consequently, it is our opinion that a *Mixed Use* designation would be a more efficient and appropriate designation for the subject property and would maintain the supportive function to the area. A *Mixed Use* designation would maintain non-residential uses on the subject property, ensuring that the lands continue to provide such supportive functions, while contributing to Regional and Municipal job growth targets, by providing the opportunity for housing.

The subject property presents an opportunity to address housing needs, while maintaining existing jobs through the introduction of commercial/retail uses. By introducing residential uses alongside compatible commercial spaces, the subject property can introduce a transitional land use along the Burnhamthorpe corridor, between the residential uses to the north and the industrial/manufacturing uses to the south. Mitigation measures would need to be reviewed through proposed redevelopment of the site to ensure compliance with air quality and noise standards as outlined in the applicable guidelines and to demonstrate consistency with the PPS.

Road Network and Proximity to Transit

The draft Official Plan identifies Burnhamthorpe Road West as a Transit Priority Corridor and the subject property is situated between the Erindale GO Planned Major Transit Station Area ('MTSA') and the planned Main LRT Primary MTSA (Schedule 4 – Long Term Transit Network). Burnhamthorpe Road West presents the opportunity to act as a connectivity link between the MTSA's. The lots fronting Burnhamthorpe Road West could contribute to the establishment of an intensification corridor, where density and height could transition from the higher-density nodes of the MTSA's to the surrounding areas.

Additionally, a *Mixed Use* designation on the south side of Burnhamthorpe Road would contribute to a transition from the existing residential neighbourhoods on the north side of Burnhamthorpe Road West to the industrial and warehousing uses further south of the subject property. By promoting mixed-use development, a vibrant community that supports a diverse range of services and amenities could be established, ultimately enhancing the quality of life for residents and workers. High-quality, compact mixed-use developments would enhance the character of Burnhamthorpe Road West, while promoting sustainable urban growth, by introducing a mix of uses, allowing for a more efficient land use that fosters a vibrant community that integrates residential and commercial spaces, ultimately providing both housing opportunities and job creation.

Proximity to Major Facilities

The draft Official Plan identifies the subject property as being located within the 600 metre influence area of a chemical plant ("Fielding Site") located at 3575 Mavis Road. Previous assessments related to planning applications and Employment Conversion Requests demonstrate how residential uses can coexist with Class 2 and 3 businesses through the evaluation of operational safety and mitigation measures, minimizing potential hazardous impacts on the surrounding area.

Based on our review of the surrounding employment uses, redesignating the subject property to permit sensitive land uses is unlikely to affect the overall viability of the Mavis-Erindale Employment Area. Residential uses have coexisted with the Mavis-Erindale Employment Area and the Fielding Plan for many years. Therefore, introducing sensitive uses on the Subject Property is unlikely to impose adverse impacts, given that there are already sensitive land uses located in proximity to existing Class 3 businesses. Adequate separation distances can support the appropriate relationship between sensitive

uses and employment uses. Further assessment will be required to complete an analysis of air quality, dust, odour, vibration and noise impacts from surrounding businesses to determine required mitigation measures. If required, the assessment would determine the most appropriate location for residential uses to be located on the subject property.

Conclusion

It is our opinion that the subject property no longer aligns with the intent of an Employment Area as set forth in the 2024 PPS and therefore should not be included in the Mavis-Erindale Employment Area. A *Mixed Use* designation would be a more efficient and appropriate designation for the subject property and would maintain the supportive function to the area. The draft Official Plan needs to be revised to better reflect the definition of Employment Area set forth in the 2024 PPS, reflecting the potential for the subject property to be utilized for a mix of uses enabling the optimization of the subject property and Burnhamthorpe Road West.

As a follow up to this submission, we ask that a meeting be arranged by City Staff to further discuss these comments, to ensure that the required revisions are captured prior to the Official Plan proceeding to Council for adoption. Weston Consulting requests notice of any future Public Meetings, Council Meetings, Staff Reports, draft Official Plan documents and/or decisions related to the Official Plan Review process and reserves the right to provide further comments.

Thank you for the opportunity to provide this submission. Please contact the undersigned (extension 241 and extension 512 respectively) if you have any questions.

Yours truly,

Weston Consulting

Per:



Ryan Guetter, BES, MCIP, RPP
President



Bryanne Robinson, MPL, MCIP, RPP
Senior Planner

c. Client

Project No. 20167-1

February 14, 2025

City of Mississauga
c/o Mr. Ben Phillips, Project Manager and Ms. Amina Menkad, Project Lead

Sent via email: 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")**

Bousfields Inc. ("Bousfields") is the planning consultant 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, which is in southeast Mississauga approximately one kilometre west of the City's eastern limits.

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 currently designated *Residential Medium Density* and *Mixed Use* in the MOP and are located within the Haig Protected Major Transit Station Area ("PMTSA"). 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.

The Development Master Plan ("Master Plan") for Rangeview Estates was Council-endorsed in July 2024. The Master Plan seeks to transform the Rangeview Lands into a mixed-use community comprised of 5,300 units. An Official Plan Amendment is currently under review (File No. OPA 24-11 W1).

Summary of Comments

We have reviewed the draft Mississauga Official Plan 2051 (provided to the public on January 17, 2025) on behalf of the Rangeview LOG. Set out below is a summary of the LOG's comments on and requests with respect to the January 2025 draft.

| Section | Policy | MOP 2051 (Proposed) | Comments |
|------------------|-------------|--|---|
| 10.2.6 Mixed Use | 10.2.6.3 | <i>"Development on lands designated Mixed-Use will: ..."</i> | <p>Replace "will" with "are encouraged to".</p> <p>Flexibility with this Policy is requested.</p> <p>The Mixed Use parcels within Rangeview currently contain suburban-style built forms with large non-residential floor plates. The ultimate vision for these lands, per the Council-adopted Master Plan (July 2024), includes mixed-use podium/tower designs. Should these parcels be required to retain a significant amount of non-residential GFA (per ii., 65%), this may <u>prohibit redevelopment</u> which would mean the housing envisioned for these lands, per the Master Plan and Haig PMTSA policies, may not be delivered.</p> |
| 10.2.6 Mixed Use | 10.2.6.5 | <i>"Within Strategic Growth Areas, redevelopment of sites with substantial office uses located on Mixed-Use designated lands will maintain the existing Gross Floor Area (GFA) of these uses".</i> | <p>Clarity as to what "substantial" means is required. The use of this word will lead to multiple interpretations.</p> <p>Replace "will" with "are encouraged to".</p> <p>Redevelopment sites should not be required to maintain all of the existing office GFA, per this policy. Details such as this should be determined on a site-by-site basis at the time of a development application. Otherwise, this policy has the ability to prohibit redevelopment.</p> <p>Flexibility with this Policy is requested.</p> |
| 14.2.4.10 | 14.2.4.10.3 | Residential Mid-Rise | <p>This heading should be revised to: Residential High-Rise, as the land use</p> |

| Land Use Designations | | | designation within this Growth Node has changed to High-Rise, per Schedule 7. |
|---|---|--|---|
| 14.2.4.10 Land Use Designations | 14.2.4.10.10 Planning and Financing Tools | <i>"In the event that there are multiple landowners, 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 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 generally not be approved until the subject landowner becomes party to the landowners' cost sharing agreement".</i> | <p>The proposed Official Plan Amendment for Rangeview (File No. OPA 24-11 W1) which is being reviewed amends this policy. See Attachment A to this letter.</p> <p>We request that the policy as set out in Attachment A be included in MOP 2051.</p> <p>Should staff not agree to include the policy in Attachment A in MOP 2051, an alternate approach would be to <u>delete</u> the word "generally" in order to strength this policy.</p> |
| 14.2.4.10 Land Use Designations | 14.2.4.10.12 Planning and Financing Tools | <i>"In order to ensure the proper and orderly development in accordance with this Plan, development will occur by way of one or more plans of subdivision which will determine the final alignment of public streets the location and size of development lots and blocks, and parkland. Development may be phased as necessary. Land consolidation will be encouraged".</i> | <p>Not all parcels within Rangeview will require a plan of subdivision to proceed.</p> <p>Amend this Policy to recognize site plans and consents.</p> <p>"...development will occur in accordance with approved site plans, consents or plans of subdivision which will determine..."</p> |
| Section | Policy | MOP (In-effect) | Comments |
| 13.3.10 Land Use Designations MOP (In-effect) | 13.3.10.1.1 | <p>The In-effect MOP includes this Policy:</p> <p><i>"Notwithstanding the policies of this Plan, business employment uses will be permitted as they existed on the day these policies come into effect".</i></p> | <p>This Policy should be included in MOP 2051 in order to ensure that the existing businesses within Rangeview are not susceptible to a legal non-conforming status.</p> |

| | | | |
|--|-------------|--|---|
| 13.3.10.4 Business Employment MOP (In- effect) | 13.3.10.4.1 | The In-effect MOP includes this Policy: <i>"Notwithstanding the Major Node policies of this Plan, the Business Employment designation will be permitted".</i> | This Policy should be included in MOP 2051 in order to ensure that the existing businesses within Rangeview are not susceptible to a legal non-conforming status. |
|--|-------------|--|---|

Conclusion

We have been advised that the City of Mississauga intends to bring forward the final draft of the MOP 2051 for Council adoption in the spring of 2025. 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 Mustafa Ghassan & Andrew Lam

Attachment A

Proposed Policy 14.2.4.10.10

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 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.

February 14, 2025

Amina Menkad
Project Manager
City of Mississauga
Via email: Official.plan@mississauga.ca

**Re: Mississauga Official Plan 2051 Review
Beedie Comment Letter**

Dear Amina,

Beedie is a developer that owns and is actively acquiring sites in the City of Mississauga. We are submitting this letter to express our concern with some of the proposed policies in the draft Mississauga Official Plan 2051. Given existing concerns with the long-term protection of employment land, a strained economy and rising construction and financing costs, we are concerned with the potential impacts that these policies would have on future industrial development.

We reviewed the draft Mississauga Official Plan and had a few clarification questions regarding policies in the draft Official Plan:

1. With respect to Policy 4.3.2.22, what is the length of time that a woodland or natural heritage feature would still be considered as such even after change or damage?

Given the historical presence of land containing woodlands and natural features in the City, we are concerned about the lack of a clear timeline and criteria for determining when a site no longer qualifies as a natural heritage feature. This policy does not provide certainty on site evaluation or the point at which a property's status changes.

2. Would development or site alteration to the natural heritage area or a Significant Natural Area be considered if demonstrated that there was no longer ecological value per Policy 4.3.2.19 and Policy 4.3.2.21 below:
 - 4.3.2.19: *“Development and site alteration as permitted in accordance with the Greenlands designation as defined in this Plan, within or adjacent to a Significant Natural Area will not be permitted unless all reasonable alternatives have been considered and any negative impacts minimized. Any negative impact that cannot be avoided will be mitigated through restoration and enhancement to the greatest extent possible. This will be demonstrated through a study in accordance with the requirements of the Environmental Assessment Act.*

When not subject to the Environmental Assessment Act, an Environmental Impact Study will be required.”

- *4.3.2.2.1 When determining the size of a woodland, areas of cultural savannahs and cultural woodlands that are confirmed to have significant ecological value that contributes to the integrity and function of the woodland, will be included for the purpose of determining woodland size and included as a Significant Natural Area. This determination will be made through an Environmental Impact Study prepared to the satisfaction of the City.*

We are concerned with the above policies and their compatibility with Policy 4.3.2.22. Our interpretation of Policies 4.3.2.19 and 4.3.2.2.1 is that alteration would be permitted to natural heritage areas if it is demonstrated that this would be supported through an Environmental Impact Study.

3. With respect to Policy 16.3.3 pertaining to the removal of lands from Employment Areas, what metrics would the City use to determine the following:
 - a. that land is not required for employment area uses over the long term; and,
 - b. that the City has sufficient employment lands to accommodate projected employment growth.

Beedie is a leading industrial developer that is committed to working with the City of Mississauga on our existing and future projects and on these policy matters. We request consideration be given to the concerns we have outlined in this letter.

We appreciate your attention and would like to schedule a meeting to discuss our questions further.

Yours truly,



Stephanie Bacani, MCIP RPP
Assistant Development Manager
647-598-1763

The Erin Mills South Residents Association (EMSRA) opposes the changes to the February 2024 version of the draft Official Plan sections 10.2.6.3 (a) and 11.3.2, contained in the January 2025 draft.

Section 11.3.2, from the February 2024 version, has been eliminated entirely in the January 2025 version. It previously read:

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.

Section 10.2.6.3 has been heavily modified to permit developers, upon redevelopment, to dramatically reduce existing walkable and cyclable shops and services. The new 10.2.6.3 (a), as re-drafted by you, will govern planning decisions: 1. in already "Planned Communities" such as Erin Mills and 2. notwithstanding an existing shortage of neighbourhood shopping centres or convenience commercial areas for shops and services.

Erin Mills South will be hard hit by this new policy because existing and future residents need, but won't have, adequate walkable shops and services. Small businesses will suffer. Mixed Use sites that have, de facto, always been commercial in nature will be changed into condo towers that increase population but significantly reduce available shops and services for every resident, new and existing. Arbour Green, Olde Burnhamthorpe, Sawmill Valley, and Bridlepath/Promontory have ONLY ONE walkable "Mixed Use" area for the essential shops and services required: "to create complete communities with destinations that are close enough for walking and cycling to be the most attractive option." (See "Mississauga Official Plan 2051" February 2024 at 10.2.6.2)

We recognize that Mississauga needs new and infill housing that is affordable. Housing is a human right in Canada. New housing should contribute to the goal of creating more walkable neighbourhood and at a minimum, should not remove the limited walkable amenities which currently exist in the City of Mississauga.

We request that you restore sections 10.2.6.3 (a) and 11.3.2 to their February 2024 version.

Thank you,

Erin Mills South Residents Association
Board of Directors

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

February 14, 2025
File No. 10595

Dear Ms. Amina Menkad, Project Lead

**RE: Draft Mississauga Official Plan 2051 (January 2025 Consolidation)
2025-2087 Dundas Street East, Mississauga**

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 purpose of this letter is to provide site-specific comments on the Draft Mississauga Official Plan 2051 (the “DMOP 2051”) as it relates to the Subject Property. This letter is intended as a follow-up to our initial letter submitted on December 9, 2024.

Description of Subject Property and Surrounding Context

The Site is currently occupied by several mixed-use plazas including eating establishments, retail stores, offices, and healthcare services and is surrounded by commercial uses along with traditional and non-traditional employment uses. The existing tenants include professional offices and services, medical offices, and other non-traditional employment uses. There are active planning applications at 1580 and 1650 Dundas Street East, approximately 1 kilometre west of the Site, to amend the Official Plan and Zoning By-law to permit over 3,000 residential units within three townhouse blocks, seven buildings with max heights between 12 and 18-storeys, and three buildings with max heights between 29 and 41-storeys. The Site is located approximately 500 to 600 metres from the Wharton Station Bus Rapid Transit (BRT) stop.

In-Force Policy Context

Schedule E-1 (Regional Structure) of the Peel Region Official Plan 2022 identifies the Subject Property within the *Urban System*. The Subject Property is located within a *Primary or Secondary Major Transit Station Area* according to Schedule E-2 (Strategic Growth Areas) of the Region’s Official Plan. Schedule E-4 (Employment Areas) designates the Site *Employment Area* within a *Major Transit Station Area Subject to a Flexible Employment Policy in the Regional Official Plan*. Schedule E-5 (Major Transit Station Areas) further identifies the Site within *Primary Major Transit Station Area Dun-17*. The Subject Property fronts onto the BRT (Bus Rapid Transit)/Highway 407 Transitway according to Schedule F-1 (Rapid Transit Corridors [Long Term Concept]).

Sections 5.8.36 to 5.8.39 of the Peel Region Official Plan 2022 states that retail, residential, commercial, and non-ancillary uses may be permitted in the *Dun-17 Major Transit Station Area*, subject to the completion of a planning study initiated by a local municipality that addresses numerous criteria, without an amendment to the Region’s Official Plan. With the Royal Assent of Bill 185, the *Cutting Red Tape to Build More Homes Act, 2024* as of July 1, 2024, the Peel Region Official Plan constitutes a plan of the local municipalities, which are required to implement and ensure that all planning decisions conform to the Region’s Official Plan. Notwithstanding Sections 5.8.36 to 5.8.39 of the Peel Region Official Plan, the Provincial Policy Statement 2024 (“PPS 2024”) prohibits non-industrial uses within Areas of Employment that were not legally established as of October 20, 2024.

Schedule 1 (City Structure) of the in-force Mississauga Official Plan identifies the Subject Property within an *Employment Area* and partially within the *Dixie EA Special Site*. The *Dixie EA Special Site* policies provide restrictions on development within the special policy area that corresponds with the Regional Storm floodplain of the Etobicoke Creek. The portion of the Site that is not located within the *Dixie EA Special Site* area is development ready. The Subject Property is located within the *Dixie Employment Area* according to Schedule 9 (Character Areas) of the in-force Official Plan and designated *Mixed Use* according to Schedule 10 (Land Use). *Employment Areas* are intended to accommodate a wide variety of industrial uses and the *Dixie Employment Area* permits manufacturing, research and development, and warehousing units in addition to the permitted uses of the *Mixed Use* designation. Although the *Mixed Use* designation permits residential uses, new residential uses are not permitted in the *Dixie Employment Area*.

Planning Act and PPS 2024

The *Planning Act* provides the legislative framework and general direction for all land use planning decisions made in the province. Bill 97, the *Helping Homebuyers, Protecting Tenants Act*, 2023 received royal assent on June 8, 2023 and amended the definition of *Area of Employment* under the *Planning Act*; the amended definition came into effect on October 20, 2024. The Site is currently within the *Dixie Employment Area*.

Ss. 1 (1) and (1.2) of the *Planning Act* defines *Areas of Employment* and outlines the specific uses that comprise such an area. The intent of these two subsections are to define *Areas of Employment* as clusters of traditional employment uses which exclude institutional and commercial uses that are not associated with a primary employment use. Ss. (1.1) allows municipalities to introduce official plan policies authorizing the continuation of excluded institutional and commercial uses provided that they were lawfully established on October 20, 2024.

City Council enacted OPA 182 on October 17, 2024 to amend the definition of *Employment Areas* to align with the new definition of *Areas of Employment* under the *Planning Act* and PPS 2024, and to allow for the continuation of lawfully established uses that are excluded from being in an *Employment Area*. OPA 182 amended Section 17.1.1 of the In-Force Official Plan as follows:

4. Section 17.1.1, General, Employment Areas, of Mississauga Official Plan, is hereby amended by adding policy 17.1.1.2 as follows:

17.1.1.2 Within an area of employment, a land use that is excluded from the list of permitted uses for an area of employment is authorized to continue, provided the use has been lawfully established on the parcel of land before October 20, 2024.

With the enactment of OPA 182, the existing commercial uses on the Subject Property are authorized to continue within the *Dixie Employment Area*.

Draft Mississauga Official Plan 2051

We understand the City of Mississauga is currently undertaking an Official Plan Review process that will update the Mississauga Official Plan to achieve consistency with the PPS 2024 and to conform to the Peel Region Official Plan 2022. The most recent version of the Draft Mississauga Official Plan 2051 was released in February 2024 for public review and comments.

The Draft Mississauga Official Plan 2051 identifies the Subject Property within an *Employment Area* and a *Major Transit Station Area* according to Schedule 1 (City Structure). The Site is proposed to be designated *Mixed Employment* according to Schedules 7 and 7K (Land Use Designations) and identifies most of the site within the *Dixie EA Special Site*. The draft Schedule 8G (Protected Major Transit Station Area: Dundas BRT – Kirwin, Grenville, Tomken, Dixie GO, Wharton) prescribes a minimum building height of 2-storeys on the portion of the Subject Property outside of the Special Policy Area and proposes a *Mixed Employment* designation for the Site.

We have reviewed the policies and schedules of the Draft Mississauga Official Plan 2051, and provide the following site-specific comments:

Site-Specific Comments

We request that the Subject Property be removed from the *Dixie Employment Area* as identified on the draft Schedule 1 (Urban Structure) and be redesignated as *Mixed Use Limited* on draft Schedules 7 and 7K (Land Use Designations) of the Draft Mississauga Official Plan 2051. The proposed changes to the draft schedules would have the effect of permitting all uses within the *Mixed Use* designation on the Site, along with the consideration for residential uses and other sensitive land uses without an amendment to the Official Plan subject to numerous criteria regarding compatibility, public health and safety, and the continued viability of nearby employment uses.

The re-enacted *Planning Act*, new PPS 2024, and enactment of OPA 182 have the effect of narrowing the definition of *Employment Areas* to traditional employment uses within the In-Force and Draft Official Plan. Although the Site has been transitioned under Bill 97 to allow legally established excluded uses, it has not and does not function as a traditional *Employment Area* given the existing standalone commercial plazas. Notably, the lands east of Universal Drive toward Etobicoke Creek also do not function as traditional *Employment Areas*.

The Subject Property and these nearby lands consist of stand-alone commercial plazas within the *Dun-17 Wharton Way Major Transit Station Area*, and were identified as candidates for mixed-use intensification (inclusive of residential uses) in the Council-endorsed Dundas Connects Master Plan. Given the changes to Provincial legislation, the area-wide transition of Dundas Street West and East into a high-density, mixed-use corridor, and the non-traditional employment uses on the Site, we believe that the *Mixed Use Limited* designation is appropriate for transitioning the Site from non-traditional employment uses to a broader range of transit-supportive non-employment uses, including residential uses, as intended by the Dundas Connects Master Plan. The Subject Property represents a large land holding that could accommodate transit-supportive, mixed-use development, which had also been considered by Sections 5.8.36 to 5.8.39 of the Peel Region Official Plan 2022. Extending the *Mixed Use Limited* designation from the lands west of Universal Drive to the Site is a logical consideration for assisting the City in meeting the minimum density target of 160 persons and jobs combined per hectare within the PMTSA.

Site-specific development concerns related to the development criteria for introducing residential and sensitive uses into *Mixed Use Limited* lands, including health and safety criteria (specifically as it relates to the *Dixie EA Special Site*) can be addressed through the planning approvals process. Further to this, the draft Section 10.2.7.7 contemplates a holding provision for the *Mixed Use Limited* designation that “*may be placed on lands where the ultimate desired use of the lands is specified but development cannot proceed until conditions set out in this Plan, or in an implementing by-law, are satisfied.*” We believe this to be an appropriate mechanism for

establishing the principle of residential uses as the ultimate desired use intended by the Dundas Connects Master Plan, while allowing the City to regulate development on the Site through the planning approvals process.



Figure 1 - Draft Mississauga Official Plan 2051, Schedule 1 - Urban Structure

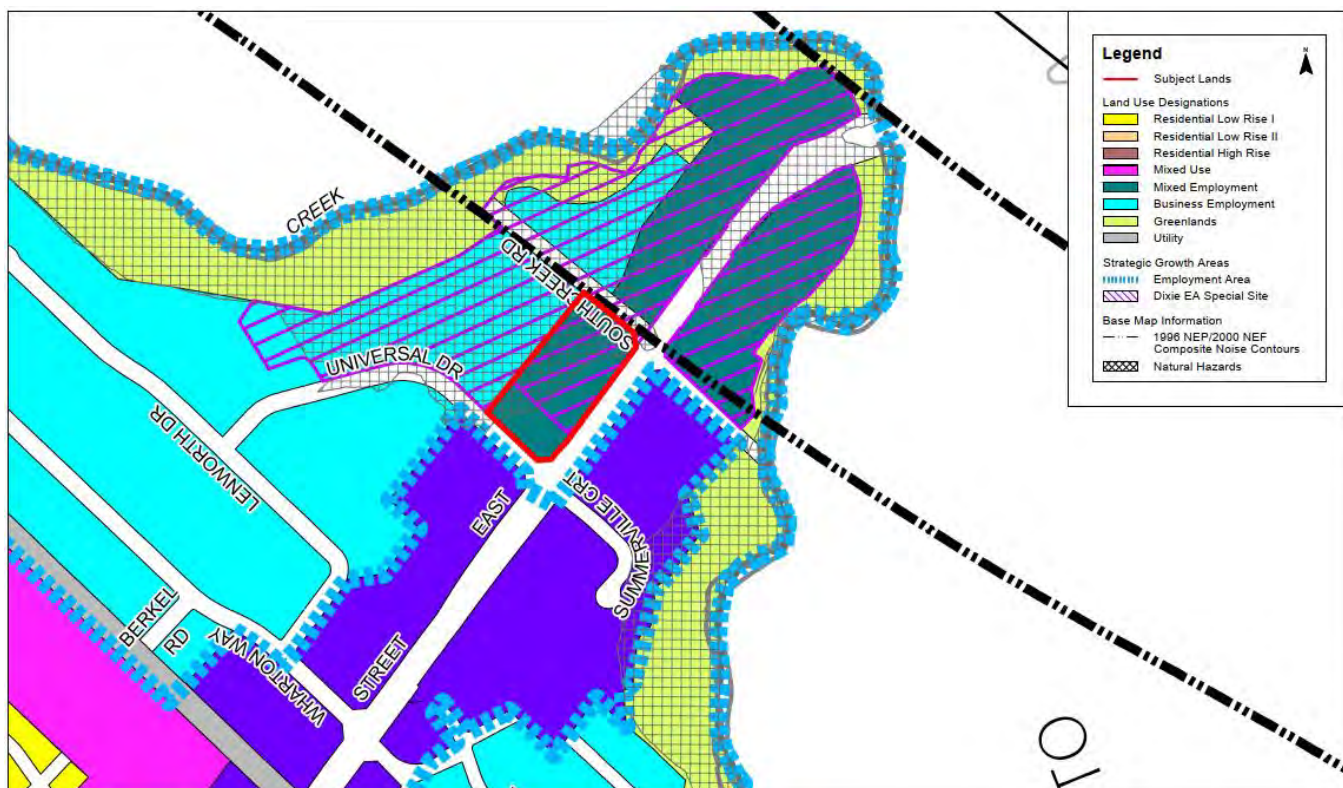


Figure 2 – Draft Mississauga Official Plan 2051, Schedule 7k – Land Use Designations



Figure 3 - Draft Mississauga Official Plan 2051, Schedule 8 – Protected Major Transit Station Areas

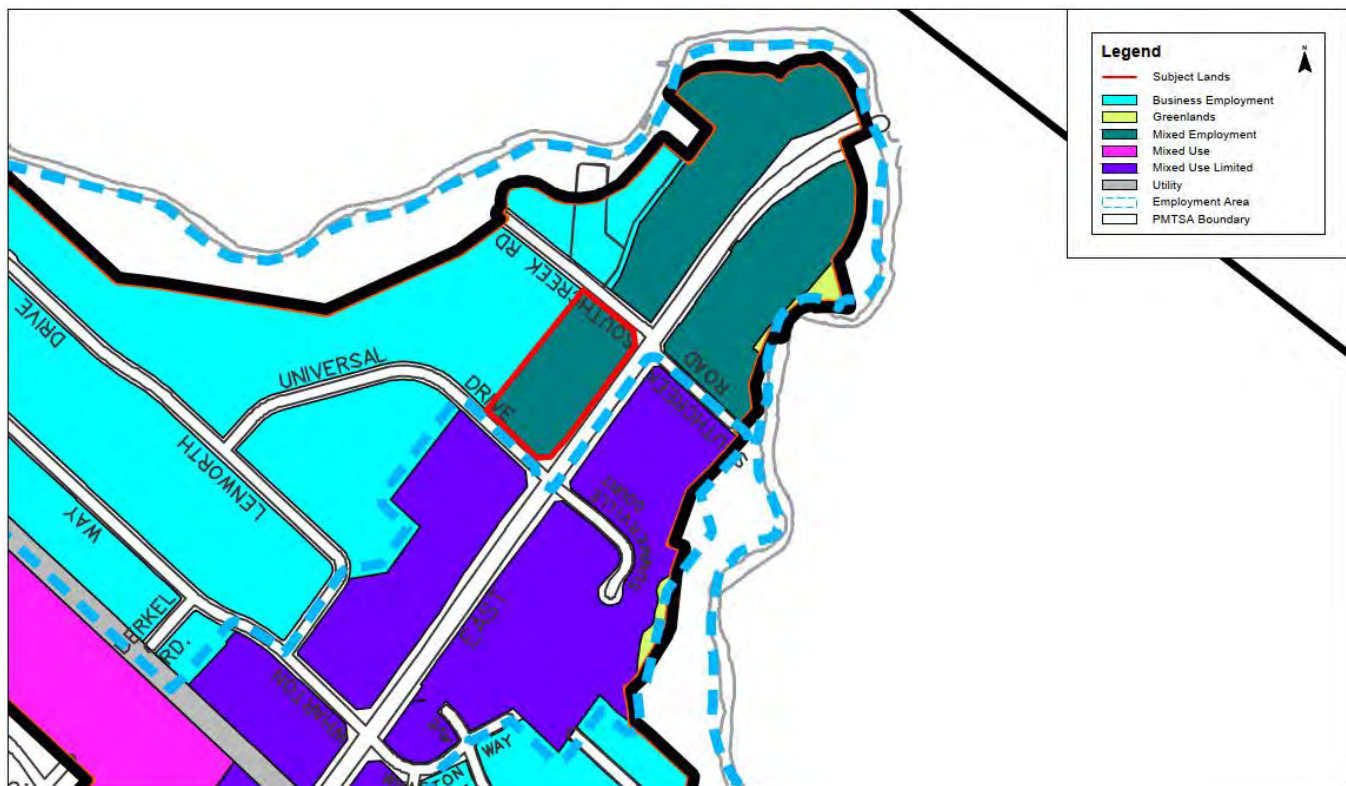


Figure 4 - Draft Mississauga Official Plan 2051, Schedule 8g – Protected Major Transit Station Area: Dundas BRT – Kirwin, Grenville, Tomken, Dixie GO, Wharton

Summary and Conclusion

We have reviewed the policies and schedules of the Draft Mississauga Official Plan 2051, and request that the Subject Property be removed from the *Dixie Employment Area* on the draft Schedule 1 (Urban Structure), and redesignated from *Mixed Employment* to *Mixed Use Limited* on the draft Schedules 7 and 7K (Land Use Designations) and 8g (Protected MTSA Dundas BRT). The Site consists of non-traditional employment uses that are intended to be transitioned into transit-supportive mixed uses (including residential uses) as intended by the Dundas Connects Master Plan and the PMTSA policy context. The existing commercial, retail and office uses could be incorporated into a future mixed use development ensuring the Site maintains non-traditional employment uses. The *Mixed Use Limited* designation considers the placement of a holding provision in the Official Plan or an implementing by-law that would recognize the ultimate desired use of the Site (mixed-use residential), while allowing the City to regulate site development through the planning approvals process. Thus, the *Mixed Use Limited* designation would provide for an appropriate policy mechanism to establish the principle of residential uses on the Site in an appropriate manner while tying the ultimate development to site-specific development applications.

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. We reserve the right to provide further comments on behalf of the Owner as it relates to this matter.

Please contact the undersigned at ext. 329 or Steven Pham at ext. 312 if there are any questions or comments with respect to our letter.

Yours Truly,

Weston Consulting

Per:



Darrin Cohen, RPP, MCIP

Senior Planner

dcohen@westonconsulting.com

cc: Andrew Whittemore, Commissioner of Planning & Building
Owner
Ryan Guetter, Weston Consulting
City Clerk's Office

February 14, 2025

City Planning Strategies
Planning and Building
300 City Centre Drive, 7th Floor
Mississauga, ON, L5B 3C1

Attn: Ben Phillips, Manager, Official Plan and Zoning Services

Re: Comments in Response to the January 2025 Draft Mississauga Official Plan

Dear Mr. Phillips,

Firstly, we would like to commend the City of Mississauga and their staff for the effort that has been put forth to date to prepare a new Official Plan with a vision for guiding growth and development to 2051. We appreciate the opportunity to provide comments on the January 2025 draft version of the new Mississauga Official Plan and would welcome an opportunity to meet with staff to discuss our comments further.

As long-time partners of the City of Mississauga and Region of Peel, Kaneff Group has maintained a steadfast presence in the City of Mississauga as a landowner, developer, investor, and a community builder. Kaneff Group has over 1,200 residential apartment units and over 75 commercial/retail units under ownership in the City of Mississauga with plans to significantly add to that total in the coming years. While we generally support the goals and objectives of the January 2025 draft version of the new Official Plan, we have concerns with specific draft policies. Our comments are summarized below.

Protected Major Transit Station Area (PMTSA) Schedule 8I

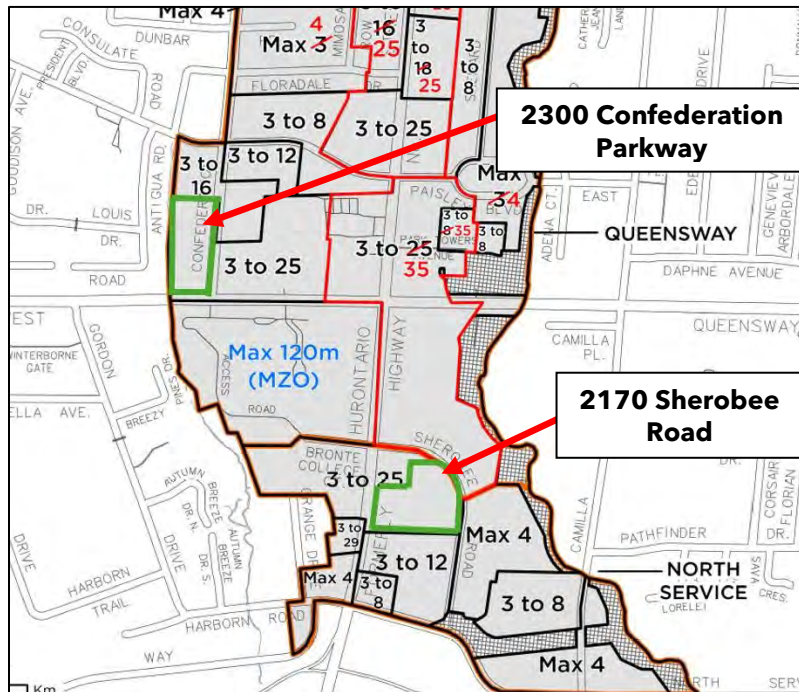
We are the registered owners of the lands municipally known as 2170 Sherobee Road and 2300 Confederation Parkway located within the North Service and Queensway PMTSA as identified on Schedule 8I. We have significant concerns that these two properties were excluded from the areas identified for maximum height increases on Schedule 8I. Both the North Service and Queensway PMTSA are planned to achieve a minimum density of 300 people and jobs per hectare. The proposed maximum height restrictions would limit future development and intensification opportunities to a maximum building height of 25 storeys, which does not optimize the use of existing and planned infrastructure, including the Hurontario LRT, and does not capitalize on an opportunity to increase the supply of housing within a PMTSA. The exclusion of these properties from the areas identified for increased building height is not justified considering approvals for heights exceeding 25 storeys have been granted for properties in PMTSAs with lower minimum density targets than the North Service and Queensway PMTSA. These sites are directly opposite of Trillium Hospital, which has been granted permissions through a MZO for a maximum height of 120 metres, which is equivalent to a 40 storey building. Furthermore, these properties are located directly adjacent to lands where maximum building heights were recently increased from 25 storey to 35 storeys to increase the supply of housing. As a developer focused on delivering much needed purpose-built rental housing in Mississauga,



we see an opportunity to further optimize the intensification of our lands within a PMTSA to increase the supply of purpose-built rental housing and improve housing affordability.

Therefore, our request is that Draft Official Plan Schedule 8I be modified to increase the maximum building height for these lands from 25 storeys to 35 storeys, or more, to support an increase in the supply of housing within these PMTSAs.

Protected Major Transit Station Area (PMTSA) Schedule 8I



10.0 Land Use Designations

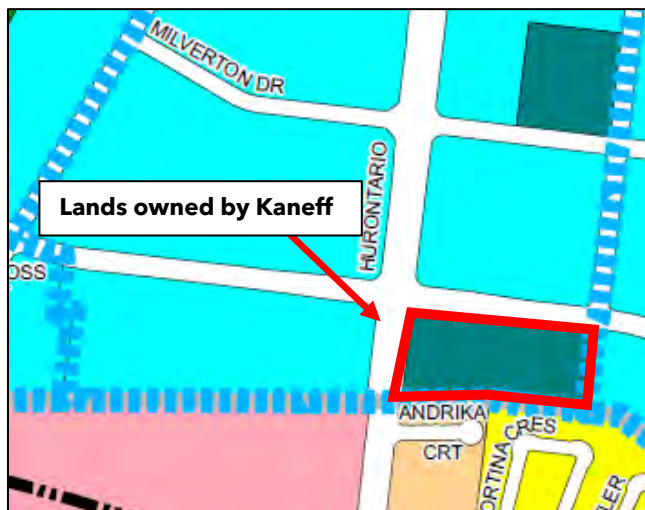
49-87 Matheson Boulevard East:

We are the registered owners of the existing commercial plaza located at the south-east corner of Hurontario Street and Matheson Boulevard East, municipally known as 49-87 Matheson Boulevard East. Our property is designated "Mixed Use" in the current Official Plan and is proposed to be designated "Mixed Employment" according to Schedule 7 - Land Use Designations and PMTSA Schedule 8h in the new draft Official Plan. We respectfully request that these lands be removed from the Gateway Corporate Centre Employment Area and designated "Mixed Use Limited" as described by policy 10.2.7. According to policy 10.2.7.4, the Mixed Use Limited designation can permit the inclusion of residential uses without an amendment to the plan, subject to satisfying specific criteria. We are of the opinion that these lands should be removed from the Gateway Corporate Centre Employment Area and designated Mixed Use Limited for the following reasons:



1. The "Mixed Employment" designation should not apply to lands located within an employment area considering the uses permitted by this designation do not conform with the definition of Employment Area as outlined in the *Planning Act* and Provincial Planning Statement (PPS).
2. The existing "Mixed Use" designation in the current Official Plan recognizes the intended function of these lands as a retail commercial plaza capable of accommodating a variety and mix of uses. The "Mixed-Use" designation more closely aligns with the existing context considering that the property is located on the periphery of an employment area and adjacent to existing residential uses.
3. The Mixed Use Limited designation requires confirmation of alignment with the criteria outlined in Policy 10.2.7.4 to permit residential uses and other sensitive land uses. Similarly, policy 11.3.4.2 includes additional criteria for the evaluation of sensitive land uses proposed near lands designated Business Employment. To permit residential and/or sensitive land use, we would need to demonstrate to the satisfaction of City staff that we are able to satisfy the criteria outlined in the new Official Plan.

Schedule 7 – Land Use Designations (49-87 Matheson Boulevard East)



25 Milverton Drive & 5770 Hurontario Street:

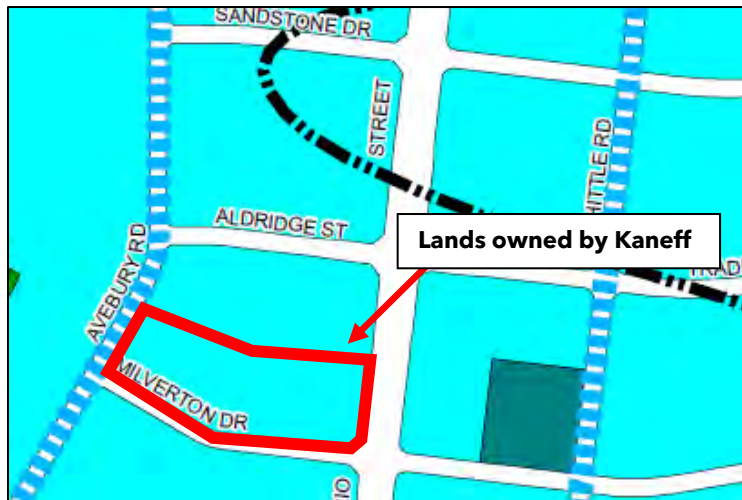
We are the registered owners of the existing office buildings located at the north-west corner of Hurontario Street and Milverton Drive, municipally known as 25 Milverton Drive & 5770 Hurontario Street. These two properties are designated "Office" in the current Official Plan and are proposed to be designated "Business Employment" according to Schedule 7 – Land Use Designations and PMTSA Schedule 8h in the new draft Official Plan. The proposed Business Employment designation permits a full range of employment-related land uses including but not limited to manufacturing, research and development, secondary office, and warehousing, distribution and wholesaling. Notwithstanding the uses permitted by the Business Employment designation, policy 16.10.2.1 states that only office, manufacturing, overnight accommodation, and research and development uses will be permitted on lands shown on Map 16-8, which



includes our lands at 25 Milverton Drive & 5770 Hurontario Street. It is also worth noting that Policy 16.10.2.1 contradicts policy 16.2.3.1 which states that *Office* uses will only be permitted in Corporate Centre *Employment Areas* as an associated use to uses permitted in *Areas of Employment* as defined by the *Planning Act*. In our opinion, policy 16.10.2.1 does not conform with the *Planning Act* and PPS definition of Area of Employment which permits “*manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities*”. Considering that the Gateway Corporate Centre is planned to be maintained as an Area of Employment, it must allow warehousing and goods movement as a permitted use and can only permit office as an associated use. We respectfully request that policy 16.10.2 be removed from the new draft Official Plan.

Our property located at 5770 Hurontario Street is currently zoned Exception O3-11 according to By-law 0121-2020. A day care is currently permitted as an accessory use to a permitted use in the O3 zone, however, a day care is not recognized as a permitted use according to the new Business Employment designation. Although a Special Policy Area has been included within the new draft Official Plan to recognize additional land use permissions for Site 66 (25 Milverton Drive), the corresponding map does not include our property at 5770 Hurontario Street. We respectfully request that the Special Policy Area mapping for Site 66 be revised to include our property at 5770 Hurontario Street to recognize existing land use permissions for the site.

Schedule 7 - Land Use Designations (25 Milverton Drive & 5770 Hurontario Street)



Mixed Use Designation:

According to policy 10.2.6, lands designated Mixed Use permit a range of commercial related land uses. Excluded from the list of permitted uses is a day nursery, commercial school, office, and grocery store. Policy 10.2.6.2 states that “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”. With consideration to policy 10.2.6.2, we believe that these additional uses should be permitted by the Mixed Use designation.



The Mixed Use policies contained within the new draft Official Plan permit the development and redevelopment of mixed use sites within Neighbourhood Character Areas for low and mid-rise buildings up to a maximum height of 8 storeys and maximum FSI of 1.75 (Policy 10.2.6.6). A maximum of 3 additional storeys may be permitted to accommodate non-residential uses above the ground floor. To address 'missing middle' housing and to support the redevelopment and intensification of lands designated 'Mixed Use', we request that Policy 10.2.6.6 be modified to permit mid-rise buildings up to 12 storeys in height without the need to provide additional non-residential gross floor area beyond the ground floor. The majority of lands designated "Mixed Use" are existing commercial plazas located along transit corridors that are well positioned to utilize existing public services, active transportation connections, and convenient access to full a range and mix of uses within an existing community. The PPS prioritizes the intensification of underutilized commercial and institutional sites (shopping malls and plazas) for residential uses and the introduction of new housing options within previously developed areas. To make these mid-rise, mixed-use intensification projects economically viable, the height permissions for mid-rise buildings need to be revisited.

13.3 Fairview, Cooksville and Hospital Urban Growth Centre

Section 13.3.3 of the new Official Plan includes draft policies regarding urban form and building transition. The draft policies require new buildings to achieve a high-quality urban design and built form that:

- a. creates 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; and,*
- b. generally maintain a minimum separation distance of 30 metres between portions of buildings that are greater than six storeys;*

The above referenced urban form and building transition policies can undermine opportunities for significant intensification within Strategic Growth Areas. Although the proposed policy language and terminology alludes to some degree of flexibility, there is uncertainty with respect to how these policies may be enforced and applied to new development proposals. Strategic Growth Areas including PMTSAs are identified as focus areas for growth and intensification. These are highly accessible areas of the City where there has been major infrastructure investment in higher order transit to support the creation of complete communities where residents can live, work and play. Building transition and separation policies, including the use of 45-degree angular planes and excessive tower separation, can often serve as a barrier to the redevelopment and intensification of lands located on the periphery of PMTSAs. Our request is that the City remove reference to 45-degree angular planes and introduce a new transition policy that would standardize setback requirements for new tall buildings within PMTSAs. We would also request that the City consider reducing the minimum tower separation from 30 metres to 25 metres. This would be consistent with the City of Toronto's Tall Building Guidelines and the City of Brampton's Urban Design Guidelines. We believe that these modest revisions to the urban form and built form transition policies will improve opportunities for redevelopment and intensification within PMTSAs and will eliminate policy restrictions that are currently a hinderance to developers delivering more housing.



8.6 Urban Design

The draft policies contained within Section 8.6 of the new Official Plan focus on building design, orientation, and placement to help define the quality and character of the public realm. Policy 8.6.1 provides a general design framework for buildings of varying scales including low, mid, and high-rise buildings. In 2022, Bill 23 - 'More Homes Built Faster Act', removed architectural details and landscape design aesthetics from the scope of site plan control. As such, we believe that the policy language and direction in Policy 8.6.1 should be revised to distinguish between the design policies that are within the scope of site plan review and those that are not. This includes, but is not limited to the following draft policies:

- 8.6.1.10 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.
- 8.6.1.14 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.
- 8.6.1.15 Buildings will be pedestrian oriented through the design and composition of their façades, including their scale, proportion, continuity, rhythms, texture, detailing and materials.
- 8.6.1.16 Buildings should avoid blank street wall conditions. Blank walls resulting from phased development will require upgraded architectural treatment.
- 8.6.1.20 Building materials will be chosen for their functional and aesthetic quality, sustainability, durability and ease of maintenance.

We appreciate the opportunity to provide our comments on the January 2025 draft version of the new Mississauga Official Plan. We respectfully request to be notified of any key milestones or decision associated with the Mississauga Official Plan Review moving forward.

Sincerely,



Kevin Freeman, MCIP, RPP

Director of Planning & Development
Kaneff Group

*On behalf of the Kaneff Leadership Team





February 14, 2025

Official Plan Review
Amina Menkad, Project Lead
Ben Phillips, Project Manager
Planning and Development, City of Mississauga
527- 300 City Centre Drive
Mississauga, ON
L5B 3C1
official.plan@mississauga.ca

Dear Amina & Ben

**Re: City of Mississauga Official Plan Review –
1 Port Street East, Mississauga**

Canada Lands Company CLC Limited ("Canada Lands"), is the owner of the lands municipally known as 1 Port Street East ("the lands"), in Port Credit Village.

Canada Lands has been working collaboratively with the City for many years towards the redevelopment of our lands. Currently, there is an approved Master Plan and Official Plan Amendment that our mutual vision for a mixed-use, medium-density community with affordable housing, commercial space, parks, and open space.

Canada Lands continues to review the materials available from the Official Plan Review, and this letter is to confirm our intent to submit additional comments as part of this public process, prior to the Statutory Public Meeting in Spring 2025.

Respectfully,

Martin Ennis
Senior Director, Real Estate

City of Mississauga
300 City Centre Drive
Mississauga, ON
L5B 3C1

February 14, 2025
File 10925

Amina Menkad, RPP, MCIP
Project Lead, Official Plan Review

Re: Draft Official Plan Comments
79 Dundas Street West and 84 Agnes Street

Weston Consulting is the Planning Consultant for the owners of 79 Dundas Street West and 84 Agnes Street with the City of Mississauga (the 'subject lands'). Weston has been retained to review the draft Official Plan being presented at the February 26th Open House and provide feedback as it relates to the subject lands. Following are our comments.

The subject lands consist of two individual parcels. 79 Dundas St. contains multi-unit retail building while 84 Agnes St. contains a residential dwelling. The draft official plan seeks to redesignate them separately as shown on Figure 1 below. The northern Agnes St. parcel is proposed as *Residential High Rise* while the southern Dundas St. is proposes as *Mixed- use*.



Figure 1 - Mississauga draft OP Land Use Schedule 7 Excerpt

The landowners are seeking to redevelop their lands similar to neighbouring lands including 3009 Novar Rd. which is under construction for an 18-storey mixed- use apartment. To facilitate high-density development that is reflective of what has been approved to the west and exists to the north, it is our request that 79 Dundas St. West be redesignated to *Residential High Rise* to match the balance of the lands. This modification would remove

the need to seek additional planning approvals to develop needed housing within the City and create density that supports the planned rapid transit along Dundas Street and Hurontario St. Further, high-rise development would also assist the City in meeting their density targets for the Dundas Major Transit Station Area (Figure 2).

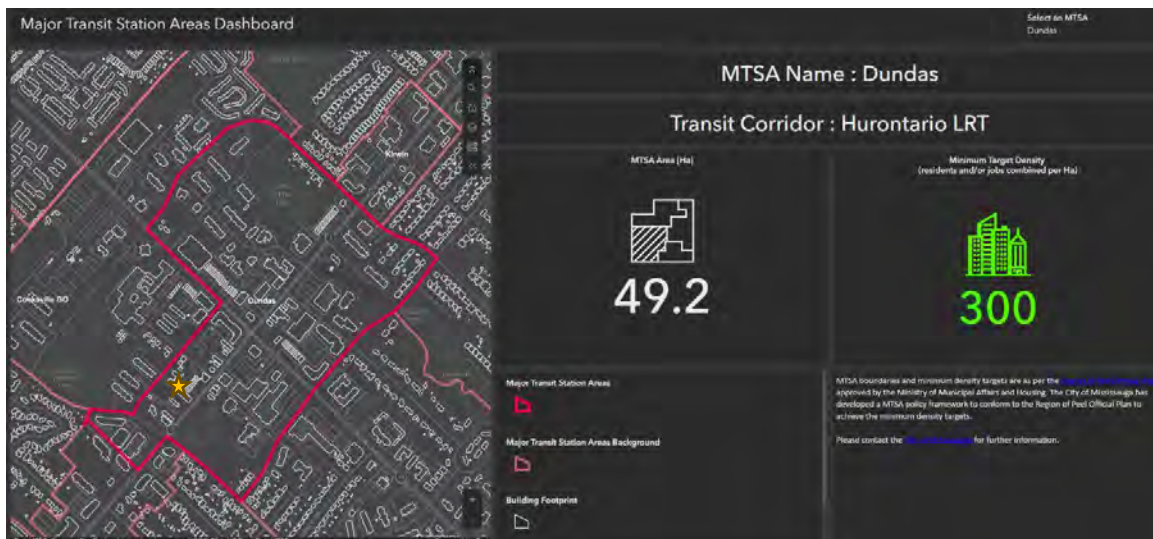


Figure 2 - Mississauga MTSA Dashboard

Scheule 8M provides for proposed heights within the MTSA and on the subject lands. This schedule proposes heights between 3 to 16 storeys (Figure 3). While that landowner supports the direction the City has taken with providing for tall buildings on their lands, there are concerns as to why heights are limited to 16 storeys. Lands adjust to the west and on the east side of Cook St. are proposed at 18 storeys. It is our opinion that the block between Novar Rd, Agnes St., Cook St. and Dundas St. all have permissions for at least 18 storeys. It is acknowledged that draft policy 13.5.4 Buildings Heights for the Cookville Growth Centre allows for increase of an additional 3 storeys for lands designated *Residential High Rise* which further supports our request to revise 79 Dundas St. to *Residential High Rise*.

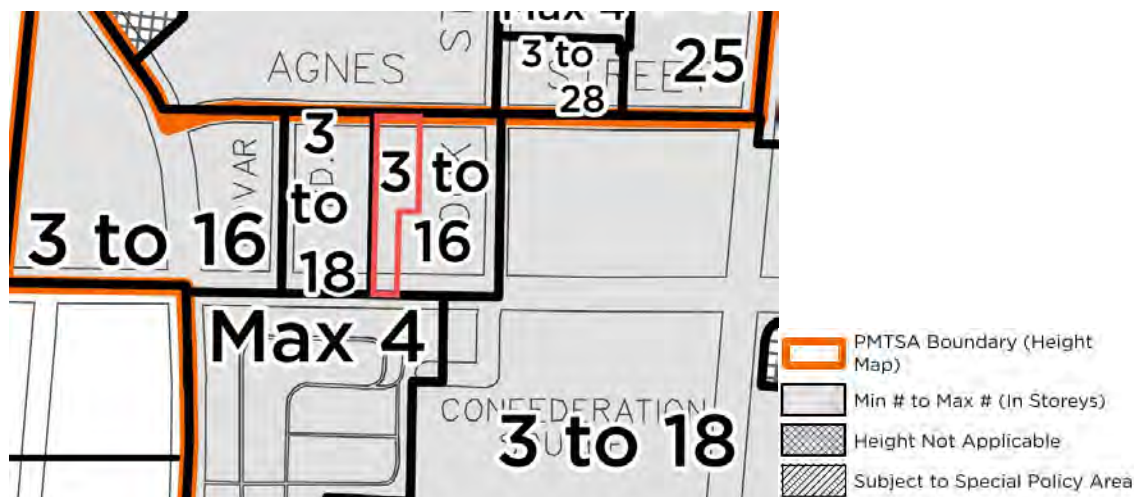


Figure 3 - Mississauga draft OP MTSA Schedule 8M Excerpt

It is important to reiterate that the rationale for the requests made in this letter are centred around the need for new housing opportunities within the city. Cooksville is identified as a strategic Growth Centre and are intended to accommodate a significant portion of the City's residential and employment growth. The City of Mississauga has committed to meeting the Provincial Housing Target of 1.5 million new homes within the next 10 years, with the City's target being 120,000 homes by the year 2031.

Weston Consulting, on behalf of the landowner, will monitor the scheduled Open House on February 26th and we reserve the right to provide further comments following that meeting or release of additional draft of the Official Plan.

Should you have any questions or wish to discuss this further please contact the undersigned at extension 266.

Yours truly,

Weston Consulting

Per:



Martin Quarcoopome BES. MCIP, RPP
Vice President

February 14, 2025

GSAI File: 1009-003

Planning & Building Department
City of Mississauga
300 City Centre Drive
ON, L5B 3C1

Attn: Ben Phillips, Project Manager
Amina Menkad, Project Lead

**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, a second letter from GSAI dated July 31, 2023 in response to Mississauga Official Plan Review – Bundle 3 Draft Policies, and most recently, the submission from March 14, 2024 on the same matter .

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 meeting.

Generally, our submissions in the past have encouraged the City of Mississauga to employ a certain level of flexibility in their Official Plan policies. While we acknowledge and appreciate some of the changes we’ve seen through the updates to the Draft Official Plan, we still have concerns surrounding a number of policies as currently drafted, including Urban Design policies and Housing policies amongst others.

Our concerns with the draft policies are described below.

Chapter 4, Sustaining the Natural Environment

Chapter 4 presents the City's natural environment policy framework. This includes policies related to a changing climate. We are concerned with Policy 4.2.2 which states:

'4.2.2. Mississauga will support the planning and design of new communities and buildings that aim to achieve near net zero emissions.'

The above-noted policy as drafted is concerning and requires revision. While we understand and support a policy framework that responds to climate change, the above-noted policy as drafted has spill over impacts for building and the development application process. More specifically, a policy that requires buildings to aim to achieve near net zero emissions will require significant investment and resources much earlier in the development approval process (Official Plan and Zoning By-law Amendment stage) than is currently contemplated, poses significant barriers to approvals timing. The above-noted policy will have the indirect consequence of requiring significant investments in the earliest development approval stages in order for a developer to find a satisfactory solution for staff and an economically appropriate solution for achieving near net zero emissions.

We question how staff will enforce this policy and have concerns surrounding the possibility of significant timing and delays through the development approvals process, where staff and a proponent may not agree on the building design/materials and achievement of the near net zero emissions. It is also not clear on whether this policy is a complement to the upcoming City Green Development Standard ('GDS') or meant to be a requirement in addition to the new City GDS which establishes a minimum score that must be adhered to, which only applies to those development applications that are proceeding through the Site Plan Control or Site Plan Approval process.

In order to implement the Mayor's Task Force and Housing Pledge objectives of building more housing, we respectfully request that this policy be removed as it will only add barriers to developments reaching final/design implementation stages.

Chapter 5, Housing Choices and Affordable Homes

*5.2.3 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.*

Policy 5.2.3 as drafted encourages developments containing 50 or more units to provide 50% of units as family-sized or two and three bedroom units. While we understand the intent of the policy and appreciate use of the word 'encourage', the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. We also have concerns about how enforceable this becomes. The latter portion of this policy provides City staff with the opportunity to treat this as more of a 'requirement' by offering relief to certain types of development, which in turn, would lead to many discussions and negotiations, effectively slowing the development approvals process. We also question where the 50% target came from considering this is a

very high number, particularly through the lens of larger 3 bedroom units which do not always reflect market trends and price points.

In addition to these concerns, we remind the City that the Inclusionary Zoning for PMTSAs has been established, and further, that the Housing Assessment requirements have been removed as a required application submission deliverable. We interpret this to mean that the City believes that IZ is an appropriate response to ensuring affordable housing is provided for, and in turn has identified where new affordable housing is to be placed. We agree with that and encourage the City to allow IZ policies to continue to be the governing metric/parameter in terms of requiring any sort of housing. Policy 5.2.3 would frustrate the timely approvals for development applications and present a market barrier by providing for units that may not sell, as evidenced in excerpts from the Mayors Task Force Report from January 2025.

Chapter 8, Well Designed Healthy Communities

Chapter 8 presents the urban design-related policy framework. We remain concerned with the urban design policies as drafted in the Official Plan. Firstly, Urban Design should be considered as Guidelines or phrased as “encouraged” if it is at all to be described under the Official Plan. We have these concerns with urban design requirements based in our experience with development applications across the City, but also in relation to the direction as outlined by the Mayor’s Task Force noting further work should take place to evaluate these requirements.

Policy 8.6.2.5 provides:

8.6.2.5 Transitions between buildings with different heights will be achieved by providing an appropriate change in height and massing. This will be done using methods that may include setbacks, the stepping down of buildings, angular planes, separation distances and other means in accordance with Council-approved plans and design guidelines.

Policy 8.2.9.c) states that the City’s vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. We agree with this policy in principle, however maintain that this policy should be interpreted as flexible and not determinative. It sets a dangerous precedent for underutilization of sites and room for interpretation by staff/reviewers when trying to navigate the ambiguity of “*appropriate change*”. The policy as drafted suggests that there are various ways and tools available to ensure appropriate transition is provided so we question the enforceability of this policy and generally, the evaluative criteria to determine what is an ‘appropriate’ transition.

In our opinion, attaching policy requirements to a largely qualitative urban design measure/tool is counterintuitive to smart growth and intensification strategies and does not respond provide a contextually appropriate response that acknowledges the City’s hierarchy and the unique nature of some of the City’s existing and transitioning sites within neighbourhoods, as well as overall neighbourhoods. Adding a policy element to urban design matters (previously subject to guidelines) will restrict development and efficient, high-quality built forms in the midst of a Provincial housing crisis.

Policy 8.6.1 speaks to Buildings and Building types and includes the following for Mid Rise buildings:

*“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 be designed to consider the width of the street***

right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context”

While we acknowledge that between the previous draft Official Plan released in February 2024 and the current iteration, the definition of a mid-rise building has been improved, we remain concerned. The requirement that a mid-rise building consider the width of the street Right-of-Way onto which it fronts remains restrictive, is ambiguous and may be misinterpreted to restrict development in appropriate locations based on area or site specific context. We request that the policy definition of a mid-rise building be modified to provide as much flexibility as possible which could involve the removal of reference to the right of way widths. Again, this policy references “appropriate transition” which could be problematic and subjective in its interpretation and application.

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.

We also find the following policy problematic:

8.6.2.11 Development proposals will demonstrate compatibility and integration with surrounding land uses and the public realm by ensuring that adequate privacy, sunlight and sky views are maintained and that microclimatic conditions are mitigated.

Policy 8.6.2.11 is concerning because it is not clear what “compatibility” means to the City and could lead to subjective or independent interpretations. In our opinion if a proponent is able to prove through technical analysis that compatibility is generally achieved with or without mitigation measures, the development proposal achieves compatibility. We question whether the City shares this opinion or if the development application reviewers are working under the assumption that compatibility could be subjective and therefore harder or if not impossible to achieve in certain circumstances where agreement cannot be reached. In the case of compatibility, it is critical that reviewers have a mutual understanding, as well as an understanding with the industry, what exactly compatibility is.

We also cite this policy in relation to the Neighbourhood policies which are found in Chapter 15 of the Draft MOP which cite ‘compatibility’ as a determinative or evaluative criteria for development, or intensification, within neighbourhoods:

15.1.1.6 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.

Similarly, the reference to “appropriate transition” appears again in Chapter 15:

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

We encourage the City to remain open minded in their application of the Urban Design tools and guidelines available to them through the development review process to facilitate productive discussions with proponents in order to determine on a contextually appropriate or area specific basis, what development is appropriate. The policy tone, with references to “may” or “will”, needs to balance the needs of the importance of potential intensification with policies speaking to an appropriate fit in neighbourhoods.

We remind the City that in instances where a proponent and staff are not able to reach a mutual agreement, it often results in the matter/application being appealed, costing the city and taxpayers intensive time and resources.

8.4.5, Open Space and Amenity Areas

Section 8.4.5 provides a policy framework regarding open space and amenity areas. While we support policy to recognize that open spaces of varying forms can compliment and support a typical public space, we remain concerned with Policy 8.4.5.2 which states:

'8.4.5.2. Privately Owned Public Spaces (POPS) contribute to the public realm. These spaces, where appropriate, will be designed and maintained in accordance with the standards established by the City, and remain open and universally accessible to public. POPS provided to the City will:

- a) provide a public easement over the extent of the POPS; and*
- b) the size, extent, design, configuration and program of POPS will be done in consultation and to the satisfaction of the City.'*

The above-noted policy as drafted is concerning and requires revision. To begin, a policy requirement that a Privately Owned Public Space ('POPS') be designed in accordance with a City Standard is unnecessarily restrictive and does not afford sufficient flexibility to achieve contextually/locationally appropriate open space design. The location, design and ultimate programming of a POPS space within a development can vary depending on site-specific contexts and circumstances. Requiring that a POPS space be designed in accordance with a City Standard does not adequately reflect the above-noted variation and take into consideration any flexibility in designing open spaces that should be thought out based on an area context and in the context of a development proposal itself. This, again, is likely to cause time and cost issues through the development approvals process.

Furthermore, per our review, there is no current City Standard for POPS. Therefore, a policy requirement that a POPS be designed to conform to a City Standard that does not yet exist is premature unless those City standards plan to enforce a high degree of flexibility, in response to the issues we have cited above.

Ultimately, we would request that this policy be modified to remove reference to a City Standard and adherence to same. This would enable the provision and careful context specific design of future POPS to remain flexible and continue to support the provision of open spaces of varying sizes to support the needs of residents which may vary between areas and development proposals.

Mixed Use Lands

In addition to the above, we are concerned with Policy 10.2.6.3 which states that on lands designated Mixed Use (which, this site is currently subject to), a minimum amount of non-residential replacement Gross Floor Area (GFA) will be required based on the greater of two (2) scenarios (policy cited below). It is not clear whether this policy is applicable to the subject lands and active development application, however the spirit and intent of the policy becomes problematic.

10.2.6.3 Development on lands designated Mixed-Use will:

a. provide a minimum retail and service commercial space, equal to the greater of the two following requirements, unless otherwise specified by Character Area or Special Site policies:

i. retail and service commercial Gross Floor Area (GFA) on the ground floor of each proposed building or the equivalent Gross Floor Area (GFA) across the site. Low-rise buildings intended for transition will not be included in the Gross Floor Area (GFA) calculation; or

ii. sites under 5 ha will maintain 65% of the total existing retail and service commercial Gross Floor Area (GFA) and sites equal to or greater than 5 ha will maintain 45% of the total existing retail and service commercial Gross Floor Area (GFA). Low-rise buildings intended for transition will not be included in the Gross Floor Area (GFA) calculation; and

b. provide a concentration of a mixture of uses that meet the needs of the local population;

c. work to support local access to food through building design to include or allow for a future grocery store or retail food store, in areas where there is a demonstrated need.

A policy requiring that a minimum amount of existing non-residential GFA be replaced in a development is unnecessarily restrictive, does not reflect the post-pandemic market and trends, will serve to prevent an ability to ‘right-size’ non-residential spaces based on market trends and end-user needs and is generally contrary to best practices. Retail requirements or needs would be best evaluated on an area specific basis which can be achieved through a retail study or market needs analysis through the development application process. Additionally, this policy as currently worded is very open ended and leaves the door open for the City/community to force or “encourage” developers to maintain/rebuild grocery stores when the market dictates that they are unprofitable.

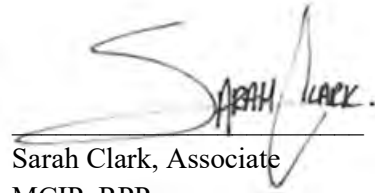
We also feel this policy and its metric is premature given the City has just begun a Retail Needs Study. Any future policies related to requiring non-residential areas should be informed by the outcome of the Retail Needs Study to avoid the need for Official Plan Amendments going forward on the basis that a development proposal may not meet the metric outlined in the policy above.

In our opinion, the policy should be removed. If removal is not to be considered, then we request that the policy be revised to clearly specify when replacement GFA is to be required and to provide a policy mechanism that references the need to submit a Market Needs Analysis to the satisfaction of staff, replacement GFA will not be required without the need for an Official Plan Amendment. If left as written today, the overwhelming metric could result in dangerous and unappealing retail space vacancies due to oversupply and for some spaces, to effectively render valuable street frontage units unused, tarnishing the City’s vision for active street frontages and animated streetscapes.

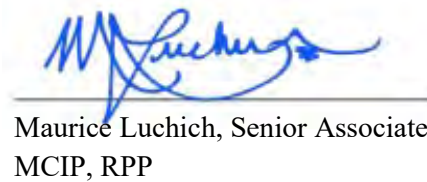
Thank you for the opportunity to provide comments on the City's Official Plan Review. We would be happy to discuss our comments with staff, if necessary.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Sarah Clark, Associate
MCIP, RPP



Maurice Luchich, Senior Associate
MCIP, RPP

cc. Andrew Whittemore, Commissioner of Planning, City of Mississauga
Queenscorp Group Inc.

February 13th, 2025

GSAI File No. 102-006J

(Via Email)
Mr. Ben Philips
Executive Manager, Official Plan
City Planning Strategies Division
300 City Centre Drive - 2nd Floor
Mississauga, ON L5B 3C1

**RE: Mississauga Official Plan 2051
Erin Mills Town Centre (EMTC Holdings Inc.)
5100 Erin Mills Parkway, City of Mississauga
Related File Nos.: DARC 23-173 W9 / OZ/OPA 24-15 W9**

**PT BLK 1, 4, 5, 6, 17, 18 AND 20, PLAN 43M-823, PIN 13512-0035
(abbreviated)**

Mr. Philips,

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 further Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative (the “proposed Official Plan”).

We appreciate the efforts made to address comments previously submitted. Through this letter, GSAI is providing further comment to reinforce our objecting stance as it relates to the Subject Lands and the City’s proposed Official Plan policies.

The Subject Lands are located on the north side of Eglinton Avenue West, west of Erin Mills Parkway. The Subject Lands are 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. GSAI is currently assisting the owners with planning application to redevelop the northwest corner of the Subject Lands. For clarity, the Subject Lands relate to the entirety of the EMTC mall property, bound by Eglinton Avenue West, Erin Mills Parkway, Glen Erin Drive and Erin Centre Boulevard.

Based on the in-effect planning policy framework, the Subject Lands are 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), are 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 are designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Further, the Subject Lands are 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.

In the proposed Official Plan, the Subject Lands are within the Central Erin Mills Growth Node. The proposed land use designation is Mixed Use and the Subject lands remain with the Central Erin Mills Character Area. Specific polices are proposed to apply to the Central Erin Mills Character Area Growth Node and are discussed later in this letter.

Chapter 3 - Directing New Development

Chapter 3 provides the City's growth management policy framework. While we support the need for a revised policy framework, we support a selection of policies and remain concerned with others. Our comments are outlined below.

3.2.4. Most of Mississauga's future growth will be directed to Strategic Growth Areas, which are the Downtown, Growth Centres, Growth Nodes and Major Transit Station Areas.

We support the above-noted policy. Directing development to delineated Strategic Growth Areas is not only good policy but it is consistent with Provincial objectives as outlined in the Provincial Planning Statement, 2024. It will also continue to ensure that development is directed to appropriate locations across the City. However, directing development to Strategic Growth Areas must be supported by infrastructure investments to ensure that the needs of community members are satisfactorily addressed.

With respect to the Subject Lands, we note the removal of the Major Node and Community Node categorizations in favour of a new category referred to as Growth Nodes. Growth Nodes are to generally provide for a mix of population and employment uses at densities and heights less than the Downtown Core and Growth Centres but greater than elsewhere in the City (3.3.1.1). We note that growth is to be primarily directed to the Strategic Growth Areas, including Growth Nodes. The growth in Growth Nodes is to be facilitated through a mixture of low-rise, mid-rise and tall buildings (3.3.5.3). We support the inclusion of tall buildings in Growth Nodes with respect to the Subject Lands.

Chapter 5 - Housing Choices and Affordable Homes

Chapter 5 presents the City's refined housing policy framework. We note the policy revision/addition to policy 5.2.2 which now provides that:

5.2.2 In order to meet its current and projected demands reflecting socio-economic and demographic trends, Mississauga will require an appropriate mix of housing by density type and affordability throughout the City.

We acknowledge that the City is seeking a mix of housing by density, type and affordability on a City-wide basis and that site development should be reviewed on a site-specific basis to determine the most appropriate housing type and price-points suitable to context and market conditions while cumulatively striving to achieve a mix of housing types and affordability across the City.

However, and outlined in our previous Comment Letter, dated March 15, 2024, we remain concerned and object to inclusion of Policies 5.2.3, 5.2.4 and Table 5.1 as drafted. Use of Region-wide housing targets, as established by Policy 5.2.4 and Table 5.1 is concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Additionally, Policy 5.2.4 and Table 5.1 which provides that 30% of all new housing units, regardless of a property's location, are to be affordable housing units is contrary to in-effect legislation as well as Provincial and Regional policy objectives which collectively state that affordable housing units are legislated requirements only in Inclusionary Zoning Areas. We request again that Table 5.1 be modified to reflect the City-wide scale and to reflect that affordable housing units cannot be mandated on properties outside of an Inclusionary Zoning Area.

Lastly, we remain concerned with Policy 5.2.3 as drafted which encourages developments containing 50 or more units to provide 50% of units as family-sized or two and three bedroom units. While we understand the intent of the policy and appreciate use of the word 'encourage', the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. Additionally, encouragement of larger, family-sized units does not always reflect market trends or the reality that housing options for families will require a selection of housing units and price points. We continue to request that Policy 5.2.3 be modified to encourage a reduced percentage of family-sized units or remove this policy to remove a barrier to the delivery of much needed housing units in appropriate locations across the City.

Chapter 8 - Well Designed Healthy Communities

Chapter 8 presents a refined urban design-related policy framework. We remain concerned, and this is further described in relation to the proposed building classifications and land use framework, with the move to a form-based policy framework. As outlined in the March 15, 2024 Comment Letter, we remain concerned with the elevation of urban design guidance to policy. We also remain concerned that the Mississauga Official Plan continues to require certain urban design policy requirements to be met as this is contrary to the evolving direction of urban design and directives for the expeditious provision of new housing in the City.

Of particular concern is Policy 8.2.9.c) which states that the City's vision will be supported by site development that demonstrates context sensitivity and transition. A similar concern is shared with Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means or with Policy 8.6.2.6

which states that developments will provide a transition in building height and form between Strategic Growth Areas and adjacent Neighbourhoods with lower heights. Policy 8.6.2.6 is followed by the following illustrative graphic, Figure 8.9:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning. As the policies as drafted suggest, there are various ways of ensuring appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition can be achieved from urban design guidance to policy is concerning. This concern is furthered by the above-noted policies which suggest 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. Additionally and if flexibility is guaranteed, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation through the planning application review process.

8.4.5 Open Space and Amenity Areas

Section 8.4.5 provides a policy framework regarding open space and amenity areas. While we support the policy direction to recognize that open spaces of varying forms can complement and support public spaces such as public parks, we remain concerned with Policy 8.4.5.2 which states:

- '8.4.5.2. Privately Owned Public Spaces (POPS) contribute to the public realm. These spaces, where appropriate, will be designed and maintained in accordance with the standards established by the City, and remain open and universally accessible to public. POPS provided to the City will:*
- a) provide a public easement over the extent of the POPS; and*
 - b) the size, extent, design, configuration and program of POPS will be done in consultation and to the satisfaction of the City.'*

The above-noted policy as drafted is concerning and requires revision. The proposed development on the Subject Lands contemplates a large public park adjacent to a large urban plaza. The ultimate design and configuration of the open spaces is to be determined and may deviate from the above policies since the POPS standard has not been created. A policy requirement that a Privately Owned, Publicly Accessible Space (POPS) be designed in accordance with a City Standard is unnecessarily restrictive and does not afford sufficient flexibility. The location, design, stratification and ultimate programming of a POPS space within a development can vary depending on site-specific contexts and circumstances. Requiring that a POPS space be designed in accordance with a City Standard yet to be developed does not adequately reflect the above-noted variation and flexibility. A policy requirement that a POPS be designed to conform to a City Standard that does not yet exist is premature. We request that this policy be modified to remove reference to a City Standard. This would enable the provision of POPS to remain flexible and continue to support the provision of open spaces of varying sizes to support the needs of residents. For example, absent of a POPS standard, the proposed public and private open spaces on the Subject Lands should be evaluated through the development review process.

Further, there are instances throughout Chapter 13 as drafted where urban design guidelines have been elevated to policy. This includes policies 13.3.3 and more specifically policy 13.3.3.1, relating to tower separation distances and the use of 45 degree angular planes to facilitate appropriate transition. In our opinion, these policy inclusions are unnecessarily restrictive and should be removed. Rather, the inclusion of urban design guidance within area-specific Built Form Standards has been successfully implemented without issue for decades. A removal of urban design guidance from policy will also serve to further implement the recommendations arising from the Mayor's Task Force.

Chapter 10 – Land Use Designations

Revisions are contemplated to the City's land use designation framework. More specifically, the Mississauga Official Plan as drafted contemplates an evolution towards a built form-based policy framework. We are specifically concerned with Policies 10.2.6.3 and 10.2.6.4. Policy 10.2.6.3 provides that on lands designated Mixed Use, a minimum amount of non-residential replacement Gross Floor Area (GFA) will be required based on the greater of two (2) scenarios. As drafted, the wording of the scenarios is unclear and is concerning. Furthermore, a policy requiring that a minimum amount of existing non-residential GFA be replaced in a development is unnecessarily restrictive, does not reflect the post-pandemic market and trends, will serve to prevent an ability to 'right-size' non-residential spaces based on market trends and end-user needs and is contrary to best practices. Additionally, policies such as Policy 10.2.6.3 is premature in our opinion given the City has just begun a Retail Needs Study. Any future policies related to requiring non-residential areas should be informed by the outcome of the Retail Needs Study to avoid the need for Official Plan Amendments going forward. In our opinion, the policy should be removed. If removal is not to be considered, then we request that the policy be revised to clearly specify when replacement GFA is to be required and to provide a policy mechanism that should a Market Needs Analysis be provided to the satisfaction of Staff, replacement GFA will not be required without the need for an Official Plan Amendment.

We are similarly concerned with Policy 10.2.6.5 which states that where lands are within a Strategic Growth Area, are designated Mixed Use and contain substantial office uses, development will be required to maintain the existing GFA of these uses. As outlined above, we request that this policy be removed or alternatively, be revised to permit a reduction in office GFA. A policy which would permit a reduction in existing office GFA is important given the post-pandemic trends, a significant vacancy rate for office and would enable property owners to right-size the non-residential areas included in a development proposal to reflect market trends, end-user needs and to ensure the non-residential areas can be occupied to support complete community objectives and vibrant public realms.

Chapter 14 – Growth Nodes

With respect to the Subject Lands and its location with the Central Erin Mills Growth Node, we remain in objection to several of the policies proposed. As above, since the initiation of the City's new Official Plan review process, a new Provincial policy framework has been established by the Province that places particular emphasis on redevelopment underutilized shopping centres and surface parking areas with increased intensification to achieve the goal of creating complete communities. With respect to the Subject Lands, we continue to object to the Central Erin Mills Growth Node policies proposed for employment retention, housing and overly restrictive urban design, height and density limitations.

We continue to object to the Growth Node policies that require maintenance of the existing number of jobs following redevelopment. Specifically, policy 14.1.1.3 provides that:

14.1.1.3 Development applications within Growth 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 supported.

As previously stated, we are concerned with policy requirements for non-residential replacement. In addition to this concern, the above-noted policy 14.1.1.3 (previously 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.

Suggesting that all changes to land use designations will not be supported if a reduction in the number of jobs existing does not consider the site-specific nature of existing shopping malls and surface parking areas in the Node and expected to be developed with a higher intensity of uses. It can be expected that deviations in the number of jobs resulting from redevelopment will occur. The surrounding context also needs to be taken into consideration, whereby existing employment centres, and in this case the Erin Mills Town Centre mall, already provide for significant employment and jobs absent of residential uses. We request that this policy be further refined to allow for flexibility and to remove *will not be supported* from the policy language. As outlined in other sections of the proposed Official Plan, the City should continue to encourage employment

retention and creation on development lands, but not mandate it through overly restrictive Official Plan policies.

Residential Uses policies proposed through policy 14.2.1.5 and related sub-policies suggest that new residential development will be required to provide housing units that are below market value while specifying unit sizes and configurations to be provided for in new residential development. While we appreciate the City's efforts to attract affordable or below market housing, the policy as written prescribes certain percentages and unit size and type criteria that may not be feasible at the time of planning applications or redevelopment. We continue to insist that specific percentages of housing type and tenure be removed from the proposed Official Plan.

The Subject Lands retain the Mixed Use land use designation. Policy 14.2.1.6.1 provides that lands designated Mixed Use *will provide for a variety of retail and service commercial uses*. We object to this policy since it does not consider that in subsequent policies, reduction in employment can be considered so long as the planned function of the non-residential uses is maintained. As outlined in MOPA 115, the planned function describes a focal point for retail and service commercial uses, community facilities and bus facilities that should be retained. In considering revisions to this policy and related policies, consideration needs to be had for surrounding context, off-site lands, the retention of surrounding land uses and maintenance of the planned function, on site and on surrounding lands, inside and outside of the Growth Node, that will contribute to the creation of complete communities.

14.2.1 Central Erin Mills

New policies have been generated in the proposed Official Plan related to the Central Erin Mills Character Area Growth Node. We note the following.

Proposed policy 14.2.1.3 – Height and Density provides unnecessary restrictions on height and does not recognize that tall buildings are permitted in Growth Nodes:

14.2.1.3.1 A minimum building height of three storeys and a maximum building height of 25 storeys will apply. Buildings without a residential component may have a minimum height of one storey.

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 areas and 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.

Further, the definition of Tall Buildings does not provide for a maximum height, but that tall buildings can accommodate transit-supportive development. Since the initiation of the Official Plan review process and partial approval of MOPA 115, the Provincial planning policy landscape

has changed through various Provincial initiatives and a new Provincial Policy Statement. We continue to question and object to the application of a maximum 25-storey building height, given this increased emphasis on the intensification underutilized shopping malls and plazas, among other factors.

With respect to density, policy 14.2.1.3.2 provides that:

14.2.1.3.2 In order to guide the form, massing and density of proposed buildings, individual properties will be limited to a maximum floor space index (FSI) of 4.0.

We continue to object to the application of a maximum floor space index (FSI) that may not accurately reflect site-specific development conditions and considerations including development limits and boundaries on larger, mall-based properties and possible conveyances for public roads, parks and other areas as deemed to be suitable during the development review process. Combined, height and density policies should offer flexibility on a site-specific and development review basis and should have consideration for the new Provincial Policy Statement's increased emphasis on the intensification of underutilized shopping plazas and parking lots.

As above, we continue to be concerned and object to the Residential Uses policies of 14.2.1.5 – Residential Uses. The integration and delivery of affordable and below-market housing units in this manner places an additional burden on development planning. Mixing tenure and pricing in a development or building can be cumbersome and may detract from the desirability of providing residential housing, overall. 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. Particularly concerning, is the application of a minimum of 10 percent threshold for below-market housing.

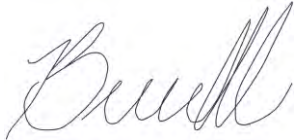
Lastly, we question the suitability of establishing maximum block sizes through policy 14.2.1.8.2. Existing buildings, properties and planning for new development will intersect and instances may arise where this threshold is exceeded. This proposed Official Plan policy is overly restrictive and should be removed.

Summary

In summary, we appreciate the efforts made to address previous comments submitted. However, we continue to object to the proposed policy and revisions outlined in the draft Official Plan as they may have substantial impact on the redevelopment of the Subject Lands. 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 for or to context of 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

C. City Clerk, City of Mississauga

February 13th, 2024

GSAI File: 1495-001

(Via Email)
Mr. Ben Philips
Executive Manager, Official Plan
City Planning Strategies Division
300 City Centre Drive - 2nd Floor
Mississauga, ON L5B 3C1

RE: Submission Letter #2
Mississauga Official Plan 2051
City File: CD.02-MIS

3670 Hurontario Street
Related File: #DARC 22-356
MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC.

PCL BLOCK 21-2 SEC 43M492; PT BLK 21 PL 43M492 PTS 2, 8, 9, 11, 12, 13, 14, 15, 16, 17 & 18 43R12738; T/W PT B LK 21 PL 43M492, PT 4, 43R12738 AS INLT659451; S/T PTS 8, 11 TO 18, 43R12738 IN FAVOUR OF PTS 1, 5 & 6, 43R12738 AS IN LT659452; T/W PT BLK 21 PL 43M492 PTS 1, 2 & 5, 43R13468 AS INLT659452 ; MISSISSAUGA SUBJECT TO AN EASEMENT OVER PART OF BLK OF 21, PLAN 43M-492 DES PT 2 PL 43R33665 IN FAVOUR OF PT BLK 21, PL43M492, DES PTS 3 & 4 PL 43R12738 AS IN PR1990118 CITY OF MISSISSAUGA

PCL BLOCK 21-4 SEC 43M492; PT BLK 21 PL 43M492, PTS 1, 5 & 6, 43R12738 ; T/W PT BLK 21 PL 43M492, PTS 3 & 6, 43R13468 AS IN LT659452; T/W PT BLK21 PL 43M492, PTS 7, 8, 10 TO 18, 43R12738 AS IN LT659452; S/T PTS 1, 2 & 5, 43R13468 IN FAVOUR OF PTS 2, 7 TO 18, 43R12738 AS IN LT659452 ; S/TLT537645 MISSISSAUGA

Glen Schnarr & Associates Inc. (GSAI) are the authorized agents and planning consultants for MISSISSAUGA HURONTARIO HOTEL LP.; VRANCOR MASTER GP INC., owners of the properties municipally addressed as 3670 Hurontario Street (herein referred to as (the “subject lands”). Glen Schnarr and Associates Inc. (GSAI) is pleased to make this further 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. 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 appreciate staff’s efforts to address comments previously submitted and we are pleased to provide the below further comments on the current draft Official Plan, released on February 12, 2024, as revised in January of 2025, and to provide further comment and formally state our objection to certain policies and Schedules as currently drafted in the January 2025 Official Plan.

Chapter 7 – Getting Around Our Communities

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 policies under section 7.3.2 continue to provide only general and overarching statements as to what can be secured and accommodated. For example, policy 7.3.2.3 b. provides that:

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 for the subject lands, as it does not consider existing site constraints, existing buildings and existing buildings on the opposite site of abutting roads. The subject lands abut the Sussex Gate, Enfield Place, Burnhamthorpe Road West and Hurontario Street right-of-ways. Each right-of-way should be reviewed independently through planning applications as right-of-way planning is informed by a variety of inputs including planning for the Hurontario LRT and streetscape designs to be accommodated in existing right-of-ways. With existing buildings on the subject lands, constraints need to be recognized, such as the existing access points to Sussex Gate and Hurontario Street, the existing pedestrian bridge over Sussex Gate and existing infrastructure present in all abutting right-of-ways. Widenings of existing right-of-ways may not be possible to accommodate given the presence of existing buildings and

infrastructure. As such, we continue to formally object to the inclusion of this policy, as written and the policies of section 7.3.2 in the draft Official Plan.

Chapter 8 - 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 an appropriate change in height and massing. This will be done using methods that may include setbacks, the stepping down of buildings, angular planes, 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 for the Downtown Core. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location.

Further, 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. The subject lands contain existing buildings and site constraints that may impact the ability to provide for the desired built forms and transitions prescribed in the new Official Plan.

Chapter 12 – Downtown Core

We continue to object to Downtown Core policies that suggest increases in employment opportunities should be accommodated (Policies 12.5.2 – 12.5.6) and policies relating to the maintenance and incorporation of employment and office uses. 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 Core. 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 to support the delivery of high density, compact, mixed-use forms and residential housing and inadvertently places an emphasis

on employment uses and density when the existing nature of the subject lands and specific site conditions and development objectives may not warrant it. In our opinion, the provision of appropriate office, employment uses and density is a matter best addressed during the site-specific technical evaluation of a development application.

Sussex District

As above, redevelopment should be considered on a site-specific basis that considers the subject lands existing circumstances, built form, context, constraints and opportunities. We continue to 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 12-2.2, a Proposed Pedestrian Connection on the subject lands or on Burnhamthorpe Road West continues to be illustrated. As it is not clear to what the pedestrian connection will consist of and where exactly it will be located, we continue to 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 12-2.6 – 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 also note the inclusion of new A1, A2 and A3, B and C street sub-classifications on Map 13-3.2 of Chapter 13. We object to all policies that stipulate use, access, entrance or built form and transition 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 with pedestrian and vehicle accesses. 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. Existing accesses, surface, above and below grade conditions need to be recognized in the revised draft Official Plan policies and overarching access restrictions should not be placed on specific streets without contemplation for site-specific and existing conditions.

Policies 12.11.29 provides 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. Existing parking structures should also be recognized.

On Figure 12.3, an illustration provides for how podium and stepbacks are to be designed and provides for design, streetwall 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

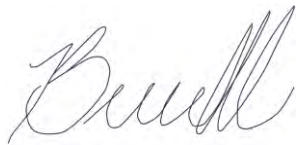
redevelopment in an already constrained area may not be able to achieve these objectives specifically and as illustrated on draft Figure 12.3.

Summary

In summary, we appreciate the efforts made to address previous comments submitted. However, we continue to object to the proposed policy and revisions outlined in the draft Official Plan as they may have substantial impact on the redevelopment of the subject lands. 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.



Bruce McCall-Richmond, MCIP, RPP
Senior Associate

cc. City Clerk, City of Mississauga

February 14, 2025

Amina Menkad
Mississauga Planning & Building Department
City Planning Strategies Division
300 City Centre Drive
Mississauga, ON
L5B 3C1

RE: **Draft Mississauga Official Plan 2051**
Comments from Greater Toronto Airports Authority

Hi Amina:

We would like to thank the City of Mississauga for hosting the latest round of community consultations and for the opportunity to share our comments on recent updates to the City's Draft Official Plan. Toronto Pearson looks forward to continuing to build on the strong working relationship between our two organizations, while supporting Mississauga's long-term vision and policies. 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

4.13.2 Noise

Aircraft Noise

Toronto Pearson continues to plan for future operational flexibility to meet the passenger and cargo demands of the region and may require future runway configurations that will require updating the current Transport Canada noise contours, likely impacting areas not currently covered by the existing contours.

The definitions used to describe the lands within the Airport Operating Area (AOA) should be broadened to describe an overall employment area that is significant to the City, the airport and the broader country. From an airport perspective, the employment uses in the AOA provide an important land use buffer against sensitive residential uses – and are critical to the future operational flexibility of the airport.

More broadly, they are not only part of the largest employment area in Canada, but when combined with the neighbouring employment lands in Brampton and Toronto, feature 1 in 7 jobs in the Toronto Region, 1 in 10 business in Ontario, and the largest concentration of manufacturing companies in North America. These employment lands surrounding Toronto Pearson and which form the AOA, are unique and size and sector diversity, making them worthy of enhanced recognition within the City's Official Plan.

4.13.2.1 - Toronto Pearson recognizes and supports additional clarification specifying the 30NEF/NEP composite noise contour line, which forms the approximate boundary of the AOA. We appreciate the inclusion of the following AOA definition in the updated Official Plan.

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.

4.13.2.2 - Toronto Pearson acknowledges the requested inclusion of the PPS (2024) airport noise policies:

In accordance with the Provincial Planning Statement, new residential development and other sensitive land uses are prohibited in areas near the Airport above the 30 noise exposure projection (NEP)/noise exposure forecast (NEF) composite noise contour.

4.13.2.5 - Toronto Pearson acknowledges the requested inclusion of the wording for notification above the 25NEF:

Mississauga will require tenants and purchasers to be notified through the development process when a proposed development is located at the noise exposure projection (NEP)/noise exposure forecast (NEF) composite noise contour of 25 and above.

4.13.2.6 - Toronto Pearson continues to support the intent of this section, including noise warning clauses forming part of the agreements that are registered on title, including condominium disclosure statements and declarations.

4.13.2.8 - Toronto Pearson supports the changes to this section, with the following wording adapted by the City:

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:

Given the focus of this section solely on the airport, Toronto Pearson would like to repeat our request to include additional context and to update the language to better reflect the current realities of the airport, recognizing the role the airport plays for Mississauga's economy. The following is our suggested wording:

Pearson International Airport 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.

The Airport is home to 400+ companies that employ over 52,000 people and facilitate over 6% of Ontario's GDP. It is at the centre of Canada's 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 the Airport 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 it as a key goods movement hub.

7.10.3 Mississauga will cooperate with the Federal Government and the Airport 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.


Chapter 16 – Employment Areas

16.10 Gateway Corporate Centre:

16.10.2.1 - Toronto Pearson supports wording of this section and exclusion of residential as permitted uses given the importance of preventing encroachment of noise-sensitive land uses and their impacts on current and future airport operations.

We appreciate the opportunity to share Toronto Pearson's 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,

Nelson Oliveira



Director, Engineering and Architectural Services

cc. Bernardo Gogna, Vice President, Airport Planning & Technical Services
Karen Mazurkewich, Vice President, Stakeholder Relations & Communications

February 14, 2025

Our File: 1315-002

Planning & Building Department
City of Mississauga
300 City Centre Drive
ON, L5B 3C1

Attn: Ben Phillips, Project Manager
Amina Menkad, Project Lead

Re: City of Mississauga Official Plan 20251 Review
Associated City File No.: OZ-22-031, SPA-112477
CRW 1 L.P., CRW 2 L.P.;
2105, 2087, 2097, 2207 Royal Windsor Drive, City of Mississauga

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission in response to the City of Mississauga draft Official Plan policies dated January 21, 2025, on behalf of our clients CRW 1 L.P. and CRW 2 L.P. ("The Owner"), owners of the properties municipally addressed as 2105, 2087, 2097, 2207 Royal Windsor Drive in the City of Mississauga ("Subject Lands").

The Owner has made formal submissions to both the Mississauga Official Plan Review and the Clarkson GO Major Transit Station Area Master Plan Study. The Owner takes interest in both processes considering its active applications for the Subject Lands: Official Plan and Zoning By-law Amendment (OZ-22-031), and Site Plan Application (SPA-112477) (together, "the Applications").

Background – Procedural Context

- The City planned to progress the Clarkson GO Major Transit Station Master Plan Study in tandem with the City's Official Plan Review.
- At a meeting held between the City and GSAI on January 7, 2025, City staff advised that the Clarkson GO Major Transit Station Master Plan Study would be delayed.
- Consequently, the City's Official Plan Review will proceed ahead of the Clarkson GO Major Transit Station Master Plan Study.

Material Issues

- Draft Official Plan *Schedule 8r Clarkson GO PMTSA* considers the Subject Lands for a Mixed-Employment designation. This designation includes draft policies that prohibit residential uses. This is directly counter to the City's own Land Use Compatibility Studies and Public Meeting (March 22, 2023) to declare that residential uses are feasible on the Subject Lands, and in the Clarkson MTSA.
- Despite the Owner's formal submissions to both the Official Plan Review and Clarkson GO Major Transit Station Master Plan Study processes, City staff have not recognized the Applications from a land use planning perspective and have not proposed a land use designation which would permit for the development proposal.

Recommended Resolution

- **We request City staff consider redesignation of the Subject Lands to Mixed Use with Residential Permissions through the forthcoming Official Plan Review work.**
- It is expected that when the Clarkson GO Major Transit Station Master Plan Study is completed, the MTSA plans will reflect the land use designation in place under the City's Official Plan.
- If that request is accepted, the Owner can address any outstanding technical matters associated with the Applications through the ongoing Zoning By-law Amendment application (OZ 22-31 W2) and Site Plan Application (SPA-112477).

Closing Remarks

The existing land use designation is overly restrictive, counter to the City's own reporting, and hinders the delivery of much-needed housing amid a housing crisis in Mississauga and across the province. Redesignating the Subject Lands through the City's Official Plan Review process will ensure a clear and efficient process for all stakeholders and facilitate faster and appropriate housing development.

Finally, we reiterate our concerns from our submission on the Clarkson MTSA Master Plan Study (dated December 6, 2024) which requests acknowledgement of the active Applications (OZ 22-31 W2), and that staff propose amendments to the maps and policies to align with this development application including amendments to the permitted uses, site programming and permitted heights under proposed Map 10, of the Clarkson MTSA Master Plan Study.

Thank you for your attention to these matters. Please feel free to contact us if you have any questions, require more information, or wish to discuss further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Glen Broll, Managing Partner
MCIP, RPP

cc. Councillor Alvin Tedjo
Andrew Whittemore, Commissioner of Planning, City of Mississauga
Rodney Gill, Goodmans LLP

February 14, 2025

GSAI File: 1101-004

Planning & Building Department
City Planning Services Division
300 City Centre Drive
Mississauga, ON L3B 3C1

Attn: Ben Phillips, Project Manager
Amina Menkad, Project Lead

**RE: Mississauga Official Plan 2051 Review
Moldenhauer
Various Properties, City of Mississauga**

Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to the current and potential future 'Owners' 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 Owners, we are pleased to be providing this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI, to date, has submitted one formal correspondence on this matter on behalf of the Owners and appeared as a delegate on behalf of our Client at the December 9, 2024, Planning and Development Committee Meeting, related to the Clarkson MTSA Master Plan work.

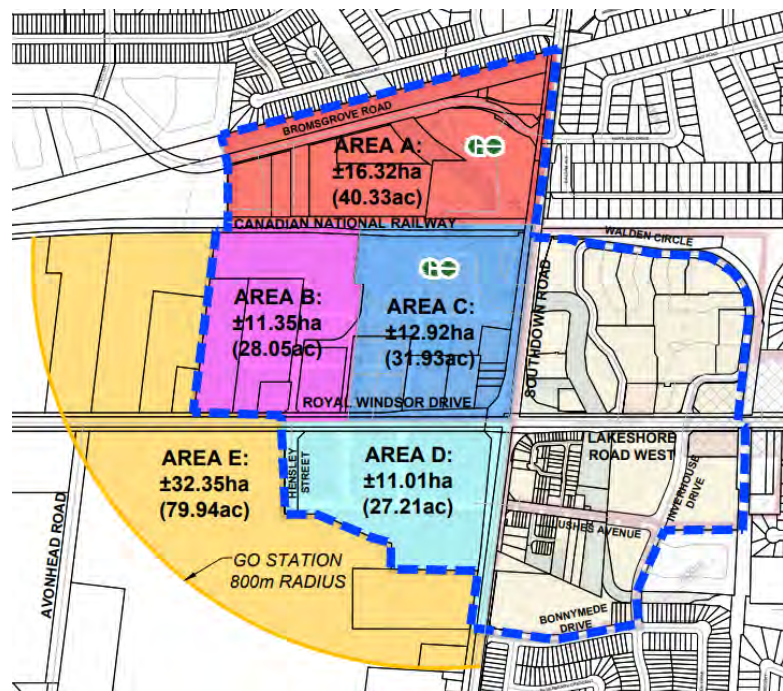
All lands subject to this request are situated within an 800m radius of the Clarkson GO Station (a "Primary Major Transit Station Area"). Presently, this greater area of the city hosts a range of land uses including (however not limited to) industrial, commercial and residential uses. The Subject Lands related to this submission are municipally addressed, as follows:

| | |
|---------------------------|--------------------------------|
| 2301 Royal Windsor Drive; | 884 Southdown Road; |
| 2265 Royal Windsor Drive; | 844 Southdown Road; |
| 2255 Royal Windsor Drive; | 800, 816 & 820 Southdown Road; |
| 2257 Royal Windsor Drive; | 758, 780, 788 Southdown Road. |
| 2226 Royal Windsor Drive, | |

We are making this submission to request that Official Plan review **staff consider the entirety of the above noted lands for inclusion within the limits of the Clarkson GO Primary Major Transit Station Area boundary** consistent with the 800m radius span permissions for Major Transit Station Areas and, further, **to redesignate the Subject Lands for "Mixed Use"** and remove the existing "Employment Lands"

designation for both the new lands brought into the MTSA delineation and those currently within the MTSA delineation but retaining Employment Lands status. We make this request as we are of the opinion that firstly, the MTSA limits as presently shown do not fully encompass lands with development potential and secondly, that the redesignation would present a logical, progressive and opportunistic approach to land use planning for strategic growth areas by opening up lands for redevelopment. GSAI's view of the MTSA limits and the land use designations are that they fall short in realizing the full potential of this MTSA given the limits which are constrained by the Clarkson-Lorne Park Neighbourhood and the Clarkson Village Community Node areas while in contrast, potential lands not constrained by long-term development unlikely to change is available south and west of the defined MTSA limits. Reviewing and redesignating these lands now provides the opportunity for an appropriate redevelopment of the MTSA limit in the future.

Per the Provincial Planning Statement 2024 (PPS 2024), Major Transit Station Areas generally are defined as the area within an approximate 500 to 800-metre radius of a transit station where growth should generally be focused. Understanding that the City replicated the Region's delineation of the MTSA's, we would encourage the City to revisit the delineation in effect for the Clarkson GO PMTSA. The City appears to have limited the lands included within the limits of the Clarkson PMTSA, as shown in the embedded graphic. The blue dashed linework represents the existing limits of the Clarkson GO PMTSA. The yellow shade/linework, represents an 800-meter radius. It is clear that there



are potential other lands which could be included in the boundary of the PMTSA and rightfully, could be considered to be captured within the limits of the defined PMTSA through the City's Official Plan Review process – the area proposed for inclusion is shown as “Area E” on the embedded graphic. We recognize that the 800-meter radius in some instances, only captures portions of certain sites (namely, 2226 Royal Windsor Drive). We would recommend as a forward-thinking precaution, that the PMTSA limits be extended to include the entirety of the lands that are captured within the 800-meter radius in order to fully realize development potential and allow the required Planning and development approvals process to vet through the opportunities and constraints for development in the area.

Major Transit Station Areas are included as lands considered “Strategic Growth Areas”, which are defined in the Provincial Planning Statement 2024 (PPS 2024)

“...as lands within settlement areas, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. This includes lands in close proximity to other areas where growth or development will be focused, that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields.”

We are of the opinion that these additional lands, as specified above, meet these qualifying characteristics to be included in the PMTSA boundary associated with the Clarkson GO Station.

We remind staff that Section 2.4.2 of the Provincial Planning Statement provides:

Planning authorities shall delineate the boundaries of major transit station areas on higher order transit corridors through a new official plan or official plan amendment adopted under section 26 of the Planning Act. The delineation shall define an area within an approximately 500 to 800- metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.

Based on the policy above provided through the PPS, we are of the opinion that the current delineation of the MTSA does not fully satisfy the direction of the Province in order to leverage or optimize land use planning and smart growth associated with the delineation and land uses captured within Major Transit Station Areas and that this current Official Plan review exercise is the appropriate time to consider this expansion. We recognize the proceeding policy surrounding minimum density targets however do remind staff that even if established density targets can be reasonably met within the confines of the existing MTSA boundaries, that those are density minimums and nothing prohibits, stops or even discourages going above and beyond the prescribed minimum density where development could be accommodated. Any increased density only further enhances the viability of transit infrastructure and investments in same. The Development Application review process will be able to determine if the development is feasible.

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) 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 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 also remind the City about the option to implement a Council approved Class 4 Designation tool, which was purposefully and intentionally brought forward by the Province to put into place a designation for emerging, transitioning and developing areas to deal with noise. The concept of the 15-minute City and capitalizing on work/live/play opportunities continues to evolve in urban settings with little to no undeveloped space, such as in Mississauga, where it is entirely conceivable that the assignment of Class 4 areas with respect to noise may become increasingly more prevalent and appropriate.

Further to the reconsideration of the delineation of the PMTSA, 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 long-term municipal, regional and provincial planning objectives for the strategic co-location of uses and creating mixed use communities that promote transit ridership and more sustainable living.

In addition to the points stated above, due to the proximity of some of the Subject Lands to the Clarkson GO PMTSA 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 west, 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. The Subject Lands have a unique opportunity to be redeveloped in a way that respects the character of the area and act as a logical extension of existing and planned non-employment uses, while providing both employment and residential opportunities. 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 (such as those seen under the “Mixed Use Limited” policies found in the Dixie Dundas policy area – with the understanding those policies are presently under appeal).

We believe that by providing for redevelopment opportunities of the Subject Lands through assignment of a Mixed Use or Residential land use designation (and appropriate implementing Zoning), that redevelopment of these lands in the future 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 some employment.

In summary, we are concerned about the proposed Clarkson GO PMTSA delineation and existing land uses as outlined in the Draft Official Plan schedules 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 continue 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.

Please feel free to contact the undersigned if there are any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

A handwritten signature in blue ink, reading "Glen Broll". The signature is stylized with a large, looping initial "G" and a long, sweeping underline that extends to the right and then loops back under the name.

Glen Broll, MCIP, RPP
Managing Partner

cc. Councillor Alvin Tedjo
Andrew Whittemore, Commissioner of Planning, City of Mississauga
Moldenhauer

February 14, 2025

Our File: 556-005B

Planning & Building Department
City of Mississauga
300 City Centre Drive
ON, L5B 3C1

Attn: Benjamin Phillips, Project Manager
Amina Menkad, Project Lead

**Re: City of Mississauga Official Plan 20251 Review
RioCan Clarkson Inc.
2260 Royal Windsor Drive & 980 Southdown Road, City of Mississauga**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission in response to the draft Official Plan policies and mapping released as of January 2025. We provide these comments to staff at the City of Mississauga on behalf of our client, RioCan Clarkson Inc., owner of the lands municipally addressed as 2260 Royal Windsor Drive & 980 Southdown Road, an existing plaza known locally as “Clarkson Crossing”. The subject property is located on the south side of Royal Windsor Drive, west of Southdown Road, and south of Clarkson GO Station within the defined limits of the Clarkson GO Primary Major Transit Station Area.

We are making this submission to request that Official Plan review staff consider our Client’s site for **redesignation to permit a mix of uses including residential permissions** through the Official Plan Review process. For clarity, our Client has no confirmed plans to redevelop the site in the foreseeable future, however, is seeking a more flexible land use than the “Mixed Employment” currently proposed under draft “Schedule 7 – Land Use Designations”.

We make this request as we are of the opinion that a redesignation to permit residential uses and other non-residential (commercial, retail, service uses, amongst others) presents a logical, progressive and opportunistic approach to land use planning for strategic growth areas by making lands available for redevelopment without major policy barriers, consistent with planned function of a Primary Major Transit Station Areas as an area where development and intensification ought to occur.

Our Client made a formal submission to staff through the Clarkson Major Transit Station Master Plan work public consultation period dated January 29, 2024, and subsequently, had a meeting with Planning staff to discuss the future of the site. At that meeting, our team was seeking clarity on the City’s vision for lands related to the future land use permissions. At that time, the site was considered as “Lands for Future Study” under the Clarkson GO MTSA Master Plan. Since that time, the lands have been proposed to be redesignated as Mixed-Employment in the City’s Draft Official Plan Schedule and the Clarkson MTSA Master plan, which prohibits any residential uses.

We acknowledge the policies found in the City's Draft Official Plan related to the need for a satisfactory Air Quality study to be submitted in order to permit for sensitive uses within the Southdown Employment Area, however, feel that the need for an Air Quality study can be requested and satisfied through a site-specific development application. Provisions for development applications are addressed already under section 18.4 Development Applications.

Further, we recognize the City's Draft Policies which say that Mixed-Employment lands are intended to support Employment Areas, however, with the site redesignated to permit both residential and non-residential uses, the site (upon redevelopment) would contain uses that could continue to support the Employment Area and can also accommodate residents, thereby supporting the City's investment in transit infrastructure and increasing ridership by exposing the transit opportunities to more people. This would be in better keeping with, or more consistent with, the planned function for Primary Major Transit Station Areas. With the current designation, it adds extra process and policy uncertainty as to whether sensitive land uses are even possible in this area which is potentially misleading based on historical findings of surrounding Land Use Compatibility Studies which concluded generally that sensitive residential uses can exist in this area (subject to site specific review), and the proximity of existing sensitive residential uses. Even the Region's former policy framework noted these broader MTSA lands could be considered candidates for additional uses pending the completion of the necessary land use compatibility studies which we believe have now been satisfactorily completed. We are concerned with the restrictive nature for the Mixed-Employment designation, particularly when evaluated against the Provincial Planning Statement policies for Major Transit Station Areas and Strategic Growth Areas and as such, request that the City consider a land use designation that includes more flexible policies which include permission for residential uses.

Please feel free to contact us if you have any questions, require more information, or wish to discuss further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Sarah Clark, Associate
MCIP, RPP

cc. RioCan Clarkson Inc.

February 14, 2025

Our File: 667-002

Planning & Building Department
City of Mississauga
300 City Centre Drive
ON, L5B 3C1

Attn: Ben Phillips, Project Manager
Amina Menkad, Project Lead

**Re: City of Mississauga Official Plan 2025¹ Review
CPD Developments
1425 Dundas Street East
City of Mississauga**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission in response to the draft Official Plan policies released as of January 2025. We provide these comments to staff on behalf of our client CPD Developments ("The Owner"), owner of the property municipally addressed as 1425 Dundas Street East (herein referred to as the "Subject Lands"). The Subject Lands are generally located at the north-east corner of Dixie Road and Dundas Street East.

GSAI has submitted a series of correspondences on behalf of our client on the ongoing Mississauga Official Plan Review since 2022. Generally, our submissions have encouraged the City of Mississauga to employ a certain level of flexibility in their Official Plan policies. While we acknowledge and appreciate some of the changes we've seen through the updates to the Draft Official Plan, we still have concerns surrounding a number of policies as currently drafted, including Urban Design policies and Housing policies amongst others. Further comments will likely be provided specific to implementing the Dundas Connects/Primary Major Transit Station Area ('PMTSA') framework once the Provincial Special Policy Area ('SPA') matter has reasonably advance or has technical resolution for our client lands.

Policies that we find problematic, are cited below:

Chapter 4, Sustaining the Natural Environment

Chapter 4 presents the City's natural environment policy framework. This includes policies related to a changing climate. We are concerned with Policy 4.2.2 which states:

'4.2.2. Mississauga will support the planning and design of new communities and buildings that aim to achieve near net zero emissions.'

The above-noted policy as drafted is concerning and requires revision. While we understand and support a policy framework that responds to climate change, the above-noted policy as drafted has spill over impacts for building and the development application process. More specifically, a policy that requires buildings to aim to achieve near net zero emissions will require significant investment and resources much earlier in the development approval process (Official Plan and Zoning By-law Amendment stage) than is currently

contemplated, posing significant barriers to approvals timing. The above-noted policy will have the indirect consequence of requiring significant investments in the earliest development approval stages in order for a developer to find a satisfactory solution for staff and an economically appropriate solution for achieving near net zero emissions.

We question how staff will enforce this policy and have concerns surrounding the possibility of significant timing and delays through the development approvals process, where staff and a proponent may not agree on the building design/materials and achievement of the near net zero emissions. It is also not clear whether this policy is a complement to the upcoming City Green Development Standard ('GDS') or meant to be a requirement in addition to the new City GDS which establishes a minimum score that must be adhered to, which only applies to those development applications that are proceeding through the Site Plan Control or Site Plan Approval process.

In order to implement the Mayor's Task Force and Housing Pledge objectives of building more housing, we respectfully request that this policy be removed or modified for clarity as it will only add barriers to developments reaching final design/implementation stages.

Chapter 5, Housing Choices and Affordable Homes

Chapter 5 presents the City's refined housing policy framework. We have concerns with a number of policies in this Chapter. Specifically, some of the policies found in Section 5.2, as cited below:

*5.2.3 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.*

Policy 5.2.3 as drafted encourages developments containing 50 or more units to provide 50% of units as family-sized or two and three bedroom units. While we understand the intent of the policy and appreciate use of the word 'encourage', the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. We also have concerns about how enforceable this policy becomes. The latter portion of this policy provides City staff with the opportunity to treat this as more of a 'requirement' by offering relief to certain types of development, which in turn, would lead to many discussions and negotiations, effectively slowing the development approvals process. We also question where the 50% target came from considering this is a very high number, particularly through the lens of larger 3 bedroom units which do not always reflect market trends and price points.

In addition to these concerns, we remind the City that the Inclusionary Zoning for PMTSAs has been established, and further, that the Housing Assessment requirements have been removed as a required application submission deliverable. We interpret this to mean that the City believes that IZ is an appropriate response to ensuring affordable housing is provided for, and in turn has identified where new affordable housing is to be placed. We agree with that and encourage the City to allow IZ policies to continue to be

the governing metric/parameter in terms of requiring any sort of housing. Policy 5.2.3 would frustrate the timely approvals for development applications and present a market barrier by providing for units that may not sell, as evidenced in excerpts from the Mayors Task Force Report from January 2025.

Chapter 8, Well Designed Healthy Communities

Chapter 8 presents the urban design-related policy framework. We remain concerned with the urban design policies as drafted in the Official Plan. Firstly, Urban Design should be considered as Guidelines or phrased as “encouraged” if it is at all to be described under the Official Plan. We have these concerns based on our experience with development applications across the City, but also in relation to the direction as outlined by the Mayor’s Task Force. Specifically, we have issues with policy 8.6.2.11:

8.6.2.11 Development proposals will demonstrate compatibility and integration with surrounding land uses and the public realm by ensuring that adequate privacy, sunlight and sky views are maintained and that microclimatic conditions are mitigated.

Policy 8.6.2.11 is concerning because it is not clear what “compatibility” means to the City (even with a definition provided) and could lead to subjective or independent interpretations. In our opinion if a proponent is able to prove through technical analysis that compatibility is generally achieved with or without mitigation measures, the development proposal achieves compatibility. We question whether the City shares this opinion or if the development application reviewers are working under the assumption that compatibility could be subjective and therefore harder or if not impossible to achieve in certain circumstances where agreement cannot be reached.

We remind the City that in instances where a proponent and staff are not able to reach a mutual agreement, it often results in the matter/application being appealed, costing the City and taxpayers intensive time and resources. In the case of compatibility, it is critical that reviewers have a mutual understanding, as well as an understanding with the industry, what exactly compatibility is. Further clarity would help to avoid timely and costly conflicts through the development approvals process.

This policy, or others that provide more specificity should also be evaluated against the Mayor’s Housing Task Force efforts which noted there are ongoing efforts required to streamline urban design requirements which are slowing down the delivery of providing housing through the evaluation of development applications.

8.4.5, Open Space and Amenity Areas

Section 8.4.5 provides a policy framework regarding open space and amenity areas. While we support policy to recognize that open spaces of varying forms can complement and support public spaces, we remain concerned with Policy 8.4.5.2 which states:

- ‘8.4.5.2. Privately Owned Public Spaces (POPS) contribute to the public realm. These spaces, where appropriate, will be designed and maintained in accordance with the standards established by the City, and remain open and universally accessible to public. POPS provided to the City will:*
- a) provide a public easement over the extent of the POPS; and*
 - b) the size, extent, design, configuration and program of POPS will be done in consultation and to the satisfaction of the City.’*

The above-noted policy as drafted is concerning and requires revision. To begin, a policy requirement that a Privately Owned, Publicly Accessible Space ('POPS') be designed in accordance with a City Standard is unnecessarily restrictive and does not afford sufficient flexibility to achieve contextually/locationally appropriate open space design. The location, design and ultimate programming of a POPS space within a development can vary depending on site-specific contexts and circumstances. Requiring that a POPS space be designed in accordance with a City Standard does not adequately reflect the above-noted variation and take into consideration any flexibility in designing open spaces that should be thought out based on an area context and in the context of a development proposal itself. This, again, is likely to cause time and cost issues through the development approvals process.

Furthermore, per our review, there is no current City Standard for POPS. Therefore, a policy requirement that a POPS be designed to conform to a City Standard that does not yet exist is premature unless those City standards plan to enforce a high degree of flexibility, in response to the issues we have cited above.

Ultimately, we would request that this policy be modified to remove reference to a City Standard and adherence to same. This would enable the provision and careful context specific design of future POPS to remain flexible and continue to support the provision of open spaces of varying sizes to support the needs of residents which may vary between areas and development proposals.

Mixed Use Lands

In addition to the above, we are concerned with Policies 10.2.6.3. More specifically, Policy 10.2.6.3 states that on lands designated Mixed Use (which, we understand this site may be subject to), a minimum amount of non-residential replacement Gross Floor Area (GFA) will be required based on the greater of two (2) scenarios:

10.2.6.3 Development on lands designated Mixed-Use will:

a. provide a minimum retail and service commercial space, equal to the greater of the two following requirements, unless otherwise specified by Character Area or Special Site policies:

i. retail and service commercial Gross Floor Area (GFA) on the ground floor of each proposed building or the equivalent Gross Floor Area (GFA) across the site. Low-rise buildings intended for transition will not be included in the Gross Floor Area (GFA) calculation; or

ii. sites under 5 ha will maintain 65% of the total existing retail and service commercial Gross Floor Area (GFA) and sites equal to or greater than 5 ha will maintain 45% of the total existing retail and service commercial Gross Floor Area (GFA). Low-rise buildings intended for transition will not be included in the Gross Floor Area (GFA) calculation; and

b. provide a concentration of a mixture of uses that meet the needs of the local population;

c. work to support local access to food through building design to include or allow for a future grocery store or retail food store, in areas where there is a demonstrated need.

As drafted, the wording of the scenarios is confusing, unclear and is concerning, particularly in the absence of a Character Area or Special Site Policy for these lands.

Firstly, the Land Use Plans for this area in the City are still to be determined based on the status of the Special Policy Area, however, we understand will generally follow the Dundas Connects recommendations which will eventually be consolidated into the City's Official Plan. This, however, still feels premature to require a certain replacement GFA, specifically in the instance where the area specific policies may not amend or update this requirement. Furthermore, a policy requiring that a minimum amount of existing non-residential GFA be replaced in a development is unnecessarily restrictive, does not reflect the post-pandemic market and trends, will serve to prevent an ability to 'right-size' non-residential spaces based on market trends and end-user needs and is generally contrary to best practices. Retail requirements or needs would be best evaluated on an area specific basis which can be achieved through a retail study or market needs analysis through the development application process, if needed at all. Staff need to be cognizant that when the broader character area developed, it's purpose, and now function in the retail market may change through the evolution of a new policy planning regime and thus, that role as exist, may not be the same in the future. In other words, the existing mix of commercial uses, many of which are large format and high proportion of furniture businesses may not be what is appropriate in the future of a new community rising from the "Dundas Connects" vision for Dundas Street East.

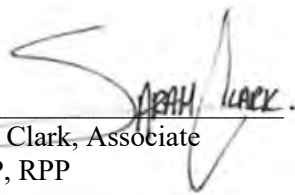
We also feel this policy and its metric is premature given the City has just begun a Retail Needs Study. Any future policies related to requiring non-residential areas should be informed by the outcome of the Retail Needs Study to avoid the need for Official Plan Amendments going forward on the basis that a development proposal may not meet the metric outlined in the policy above.

In our opinion, the policy should be removed. If removal is not to be considered, then we request that the policy be revised to clearly specify when replacement GFA is to be required and to provide a policy mechanism that references the need to submit a Market Needs Analysis to the satisfaction of staff, replacement GFA will not be required without the need for an Official Plan Amendment. If left as written today, the overwhelming metric could result in dangerous and unappealing retail space vacancies due to oversupply and effectively render valuable street frontage spaces unused, tarnishing the City's vision for active street frontages and animated streetscapes.

Thank you for your attention to these matters. Please feel free to contact us if you have any questions, require more information, or wish to discuss further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Sarah Clark, Associate
MCIP, RPP



Maurice Luchich, Senior Associate
MCIP, RPP

cc. Councillor Fonseca
CPD Developments
D Baffa, CLS



February 14, 2025

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 (January 2025 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. We are writing to share our comments and observations on the January 2025 version of Mississauga Official Plan 2051.

As noted in our June 28, 2024 public input submission 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 24 storeys, 480 units). Technical plans, reports, and studies have been prepared and filed with the City Planning Department. The now 'refined' proposal was considered by the City's Development Application Review Committee (DARC) on January 28, 2025.

Mississauga Official Plan 2051 (January 2025 Draft)

CHAPTER 8 Well Designed Healthy Communities

8.3 City Pattern

"8.3.11 Where permitted, above-ground structured parking should be lined with residential, commercial or office uses when visible from the public realm"

8.6.4 Parking, Servicing and Loading

"8.6.4.1 Parking will be located underground, internal to the building or to the rear of

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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.”

CHAPTER 11 Transit Communities

11.3.5 Urban Design

“11.3.5.2 Development will:

- 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”*

11.5 Dundas Street Corridor

“11.5.3 Development will be designed and located to:

- g. incorporate underground parking and for above grade structured parking, to be completely screened by active uses along street frontages;”*

Pursuant to the January 2025 Comment Response Matix, Staff advised that parking requirements are mandated according to the City Zoning By-law. If required, parking is to be located underground or at the rear. We continue to have serious concerns with the policy language above as they purport to regulate/restrict the location and design of above grade structured parking. Prior to finalizing the Plan, the policies should be updated to encourage best practices only which will then be applied on a site-by-site basis.

The Golden Orchard lands are an example of where policy flexibility is required. Located within a PMTSA with frontage on a regional arterial and two (2) local roads, the ‘refined’ proposal contemplates an above grade parking structure (2 storeys, 3 levels of parking) in the southwest limits of the property (refer to Context Plans and Angular Plane Analysis attached). Sited behind the existing and proposed apartment buildings, the structure will be partially visible from the local streets on account of the property’s irregular shape, orientation of the buildings, and the fact that it has multiple road frontages and exposure to the local road network. The condition is not anticipated to adversely impact the streetscape or any of surrounding land uses.

CHAPTER 11 Transit Communities

Sub-Section 11.3.3 Heights

“11.3.3.2 Development in Protected Major Transit Station Areas 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 multimodal 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 integration of the policy section above to allow for the consideration of additional building heights is very much appreciated. However, after further review we find that the criteria to be overly restrictive, vague and unclear. Prior to finalizing the Plan, the section should be updated to provide specificity so that when an owner initiated Official Plan Amendment is filed there is clarity on how the criteria is to be met.

Criteria A – It is unclear how City Staff will interpret the City Structure Hierarchy being “maintained”. The City Structure depicted on Schedule 1 provides direction on where to direct growth over the long term (i.e., 25 years). Additional height requests should be assessed on a site-specific basis and whether the proposed height is appropriate in the existing and planned context.

Criteria B – It is unclear how City Staff will determine whether an Amendment Application, which seeks to amend policies and/or schedules, will determine if the overall intent, goals, objectives, and policies of the Plan are achieved.

Criteria C – It is recommended that “vision” be deleted from the criteria as the term is vague and lacks clarity. An area should aspire to achieve a vision recognizing that it may change and evolve over time.

Criteria E – It is recommended that “minimize” be deleted from the criteria and replaced with alternative wording (i.e., “limit”). The Applicant/Proponent will be challenged to quantify minimal impact.

Criteria F and H – It is unclear why these criteria must be met for an Applicant/Proponent to request additional height. Is “full funding” limited to the City, or does it include the Region, the Province, or a combination thereof? Does partial funding render additional building height unsupportable? There does not appear to be any direct correlation between height and the need to ensure that there is additional infrastructure available. Different footprints and heights can achieve the same Floor Space Index (FSI) or density and require the same level of servicing. It is recommended that the criteria be refined and/or deleted in its entirety.

Schedule 8g – Dixie GO PMTSA

Our comments on Schedule 8g specifically relate to the Golden Orchard lands and its prescribed minimum and maximum building heights of ‘2 to 18 Storeys’. While these heights reflect current zoning permissions it does not reflect what can be ultimately

achieved on-site. We continue to emphasize that the 18-storey maximum has been prescribed without careful analysis and proper consideration for site-specific attributes and circumstances that support additional building height. In doing so the Schedule limits the redevelopment potential of the lands where compact transit-oriented development is directed to occur.

The Angular Plane Analysis attached was conducted to determine whether the 24-storey building will cause any undue impacts with respect to loss of privacy and overlook. Save and except a small portion of the upper storey and mechanical penthouse, the building and above grade parking structure is contained below the modelled 45° planes. To supplement this Analysis, a Wind Study and Sun Shadow Study was also prepared which demonstrate that the proposal will not cause undue impacts with respect to sun access and shade, wind comfort and safety. Both studies are readily available on City ePlans for Staff's consideration (DARC 22-464 W3).

In the interest of directing appropriate intensification within identified PMTSAs we urge Staff to reconsider our request that Schedule 8g be modified to reflect a maximum building height of '25 Storeys' on the subject site (refer to Figures 1 and 2). Doing otherwise is an unnecessary limitation that has potential to undermine good planning on a site-specific basis. The added storeys would facilitate the site's optimization while upholding the City Structure hierarchy.

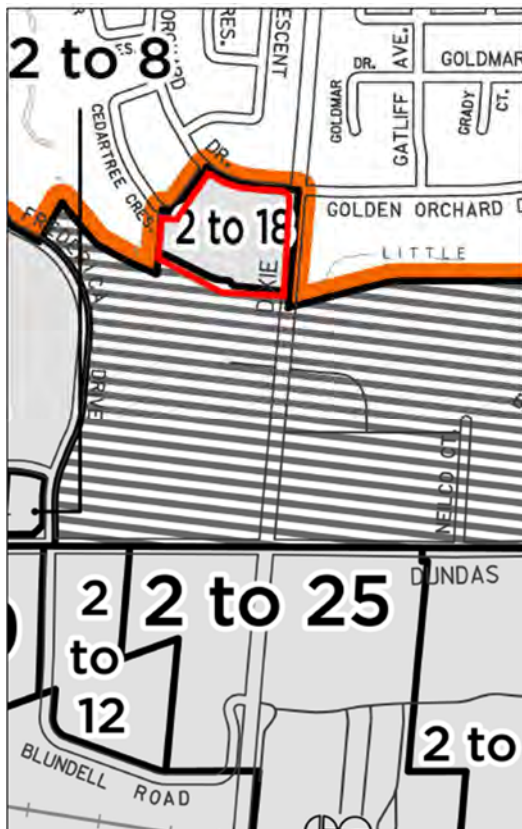


Figure 1 – Schedule 8g (Draft January 2025)

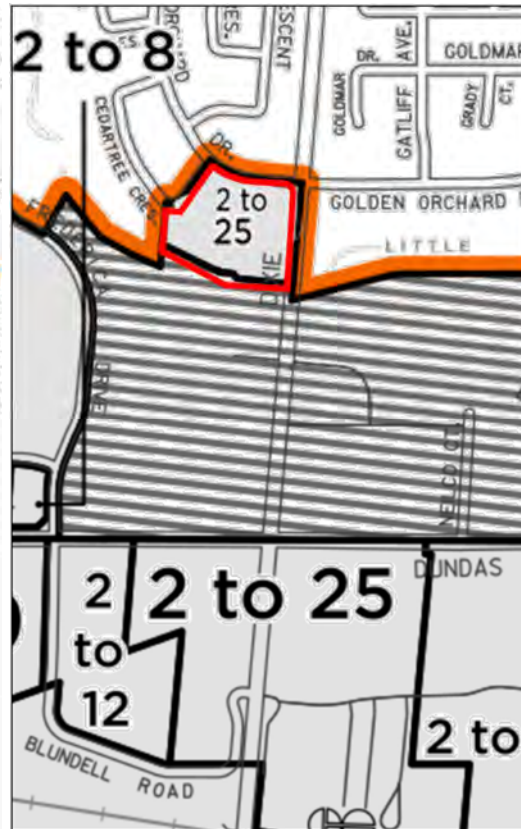


Figure 2 – Schedule 8g (Draft Modified – February 2025)

Closing Remarks

We welcome the opportunity to meet with Staff to discuss our comments, observations, and recommendations prior finalizing the Official Plan. Should you have any questions, or require further information, please do not hesitate to contact the undersigned.

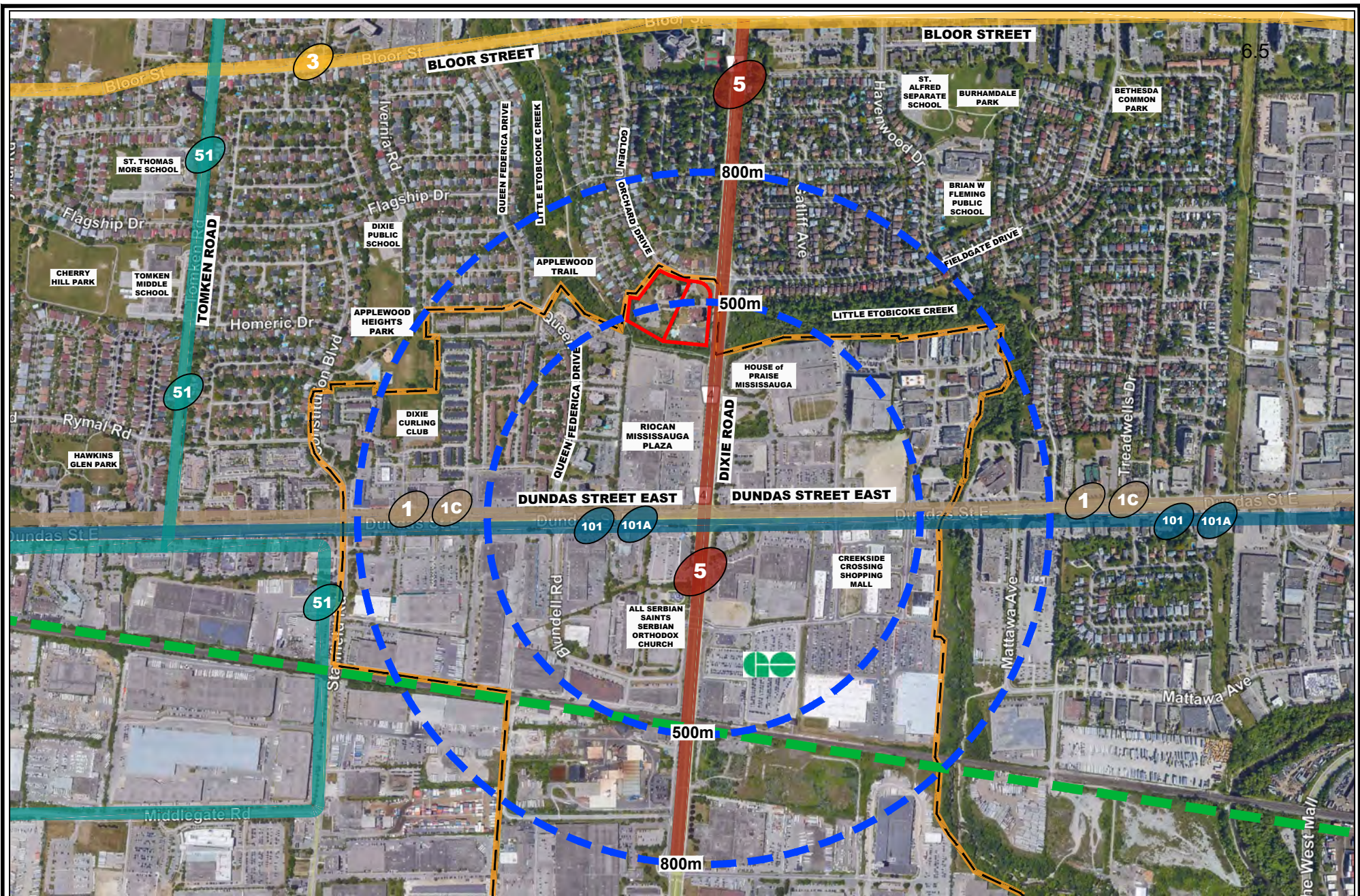
Yours truly,



Marc De Nardis, B.U.R.P.I., M.C.I.P., R.P.P.
Planning Associate

mdenardis@gwdplanners.com

C.c. A. Whittemore, City of Mississauga
1212763 Ontario Limited
1212765 Ontario Limited



- SUBJECT SITE
- DIXIE GO MAJOR TRANSIT STATION AREA
- 500-800m RADIUS from DIXIE ROAD & DUNDAS STREET EAST INTERSECTION
- TRANSIT ROUTE 5 (DIXIE)
- TRANSIT ROUTE 1, 1C (DUNDAS, DUNDAS-COLLEGEWAY)

LEGEND

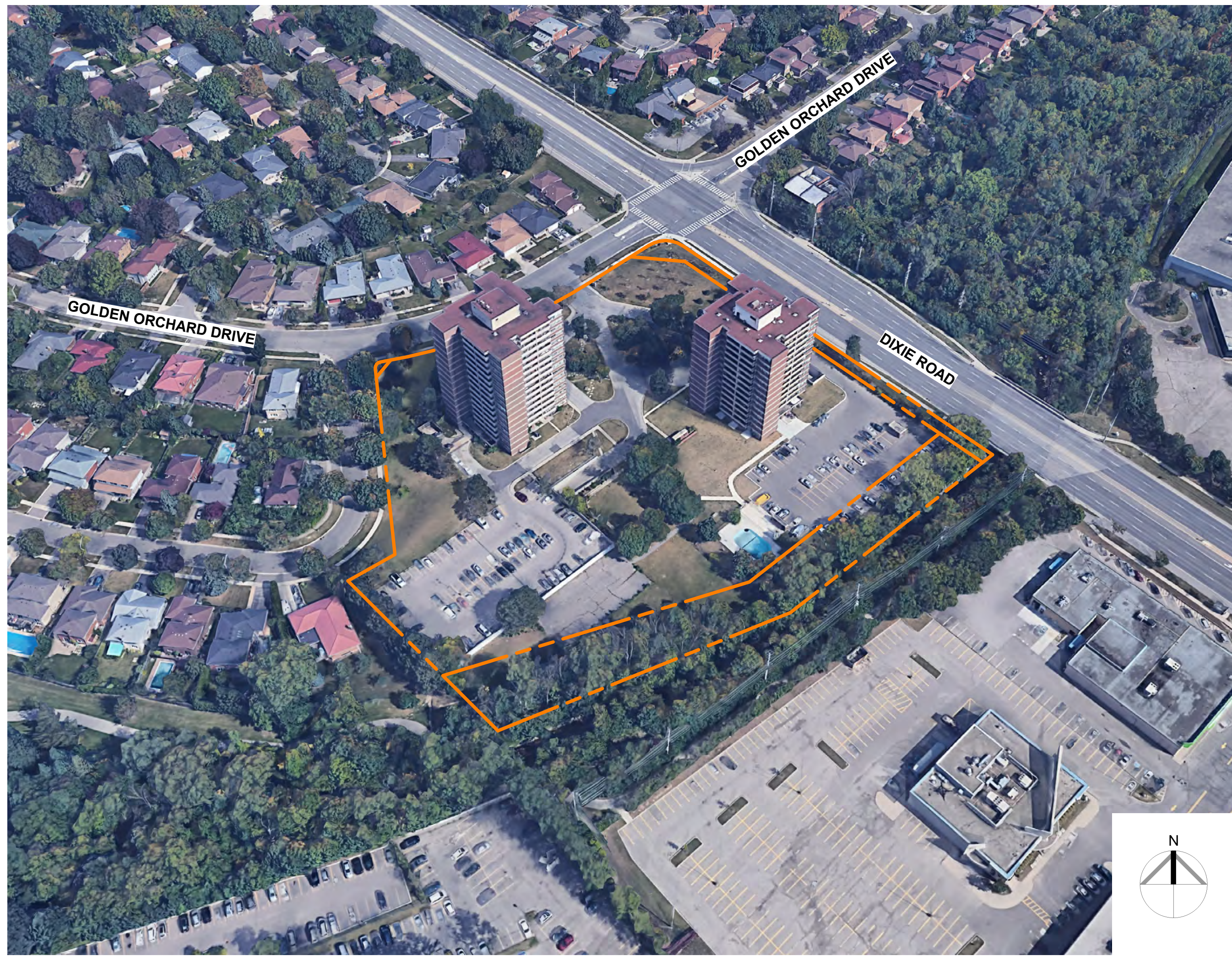
- TRANSIT ROUTE 3 (BLOOR)
- TRANSIT ROUTE 101, 101A (DUNDAS EXPRESS)
- TRANSIT ROUTE 51 (TOMKEN)
- DIXIE GO STATION
- GO TRANSIT RAIL LINE

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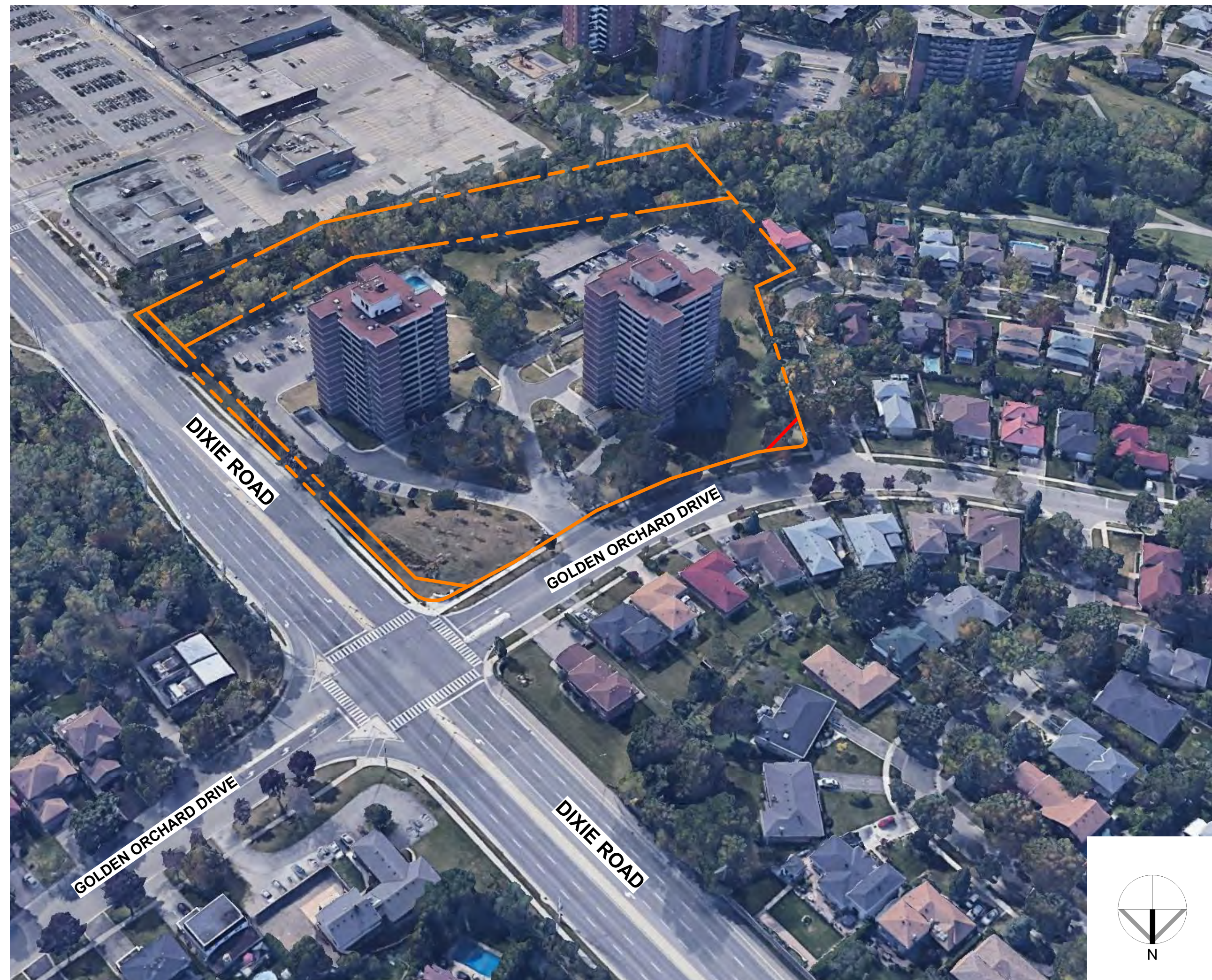




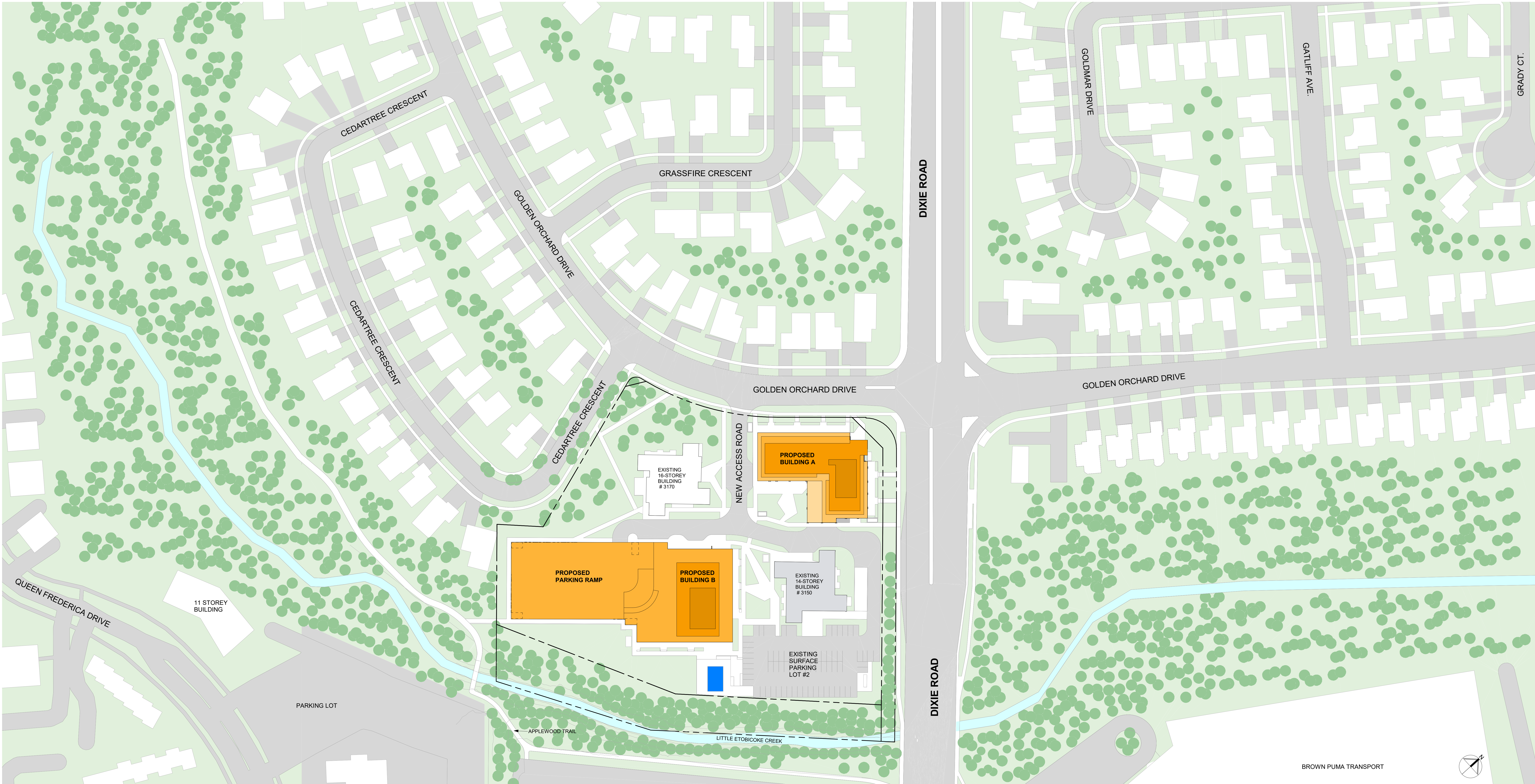
1 Site Context



2 Context 3D Perspective- Northward View



3 Context 3D Perspective- Southward View



4 Context Plan
1 : 700

6.5

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KIRKOR
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20 De Boers Drive Suite 400
Toronto, ON M3J 0H1

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Client:
AZURIA GROUP INC.

3150 & 3170 Golden Orchard Drive
Mississauga, ON
Proposed Residential Development

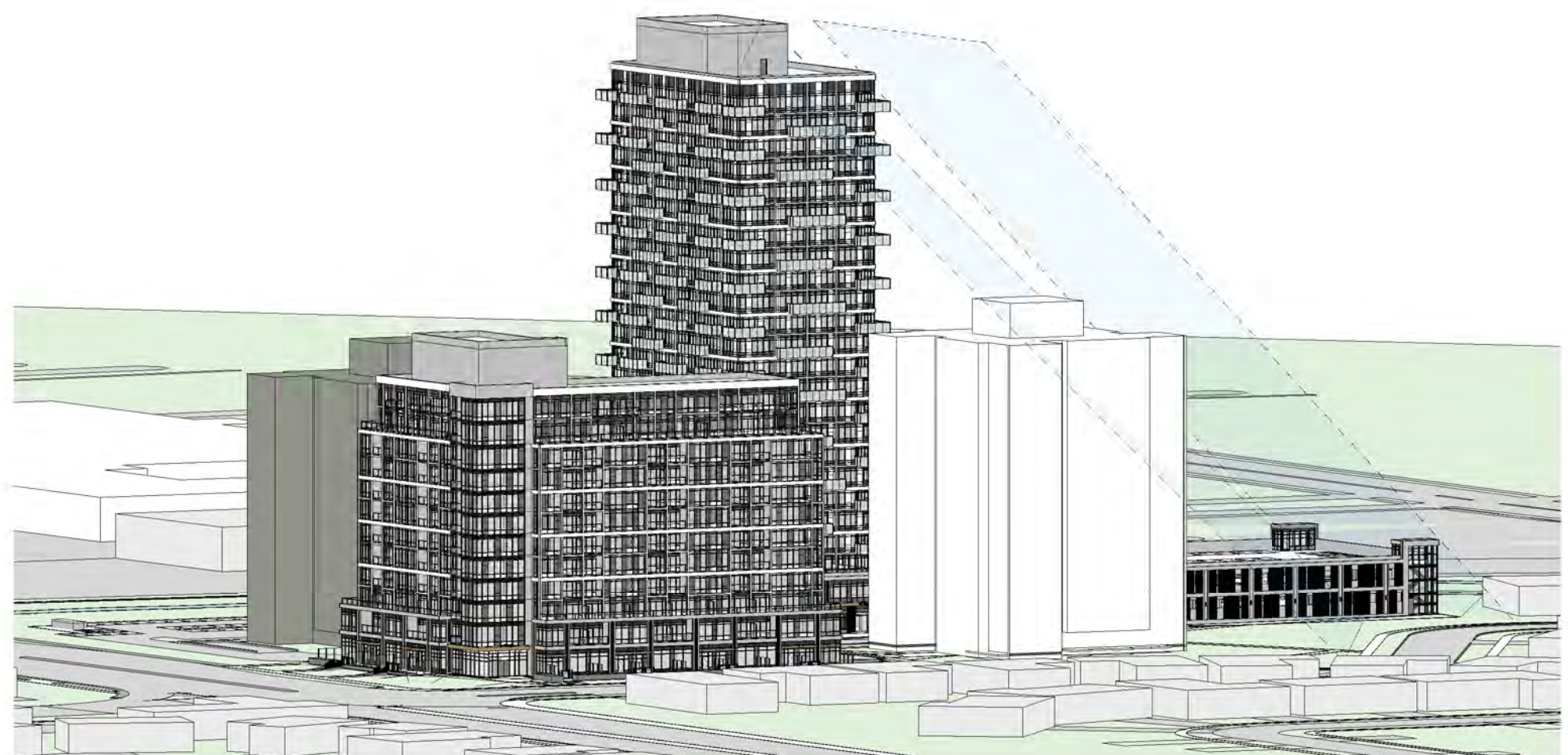
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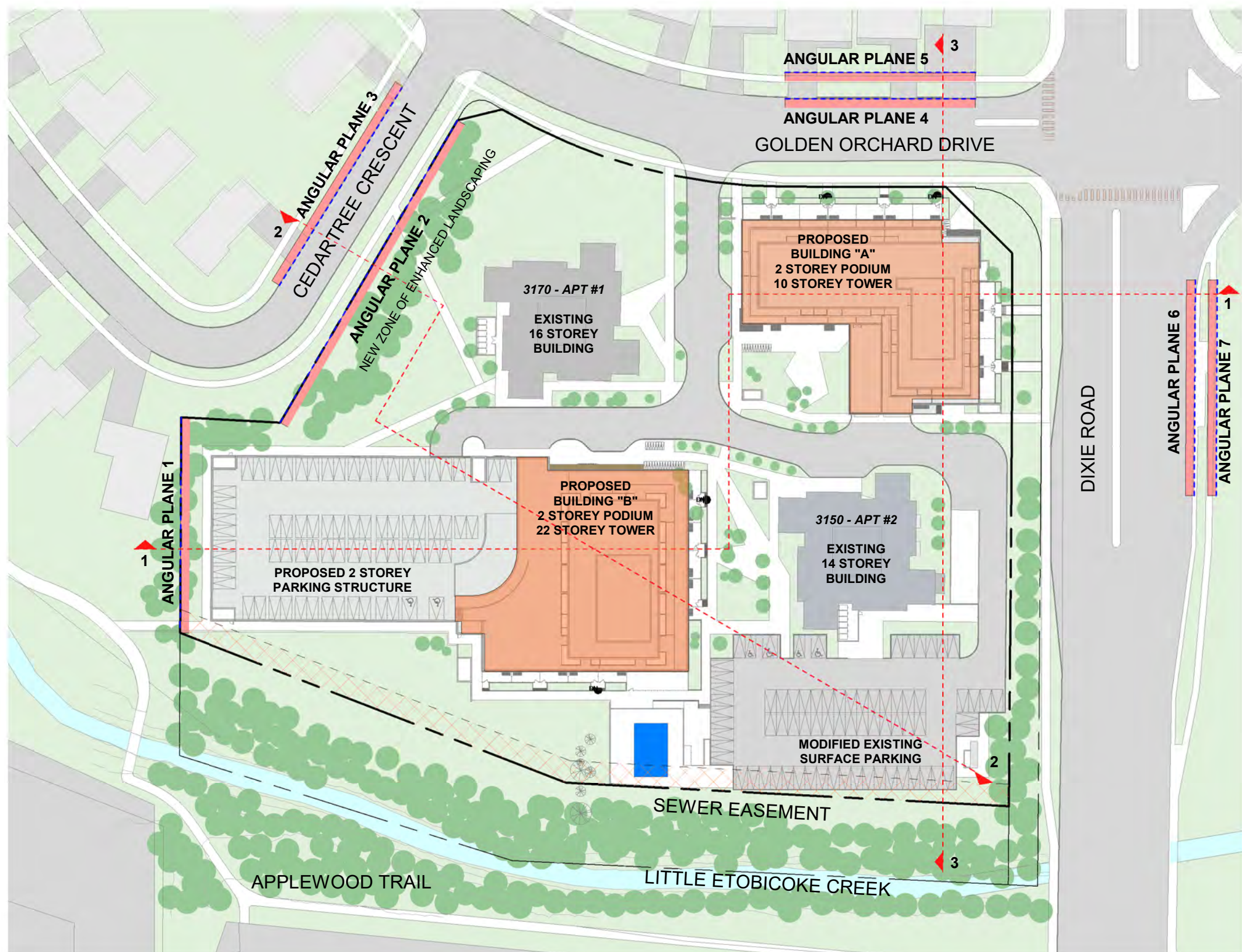
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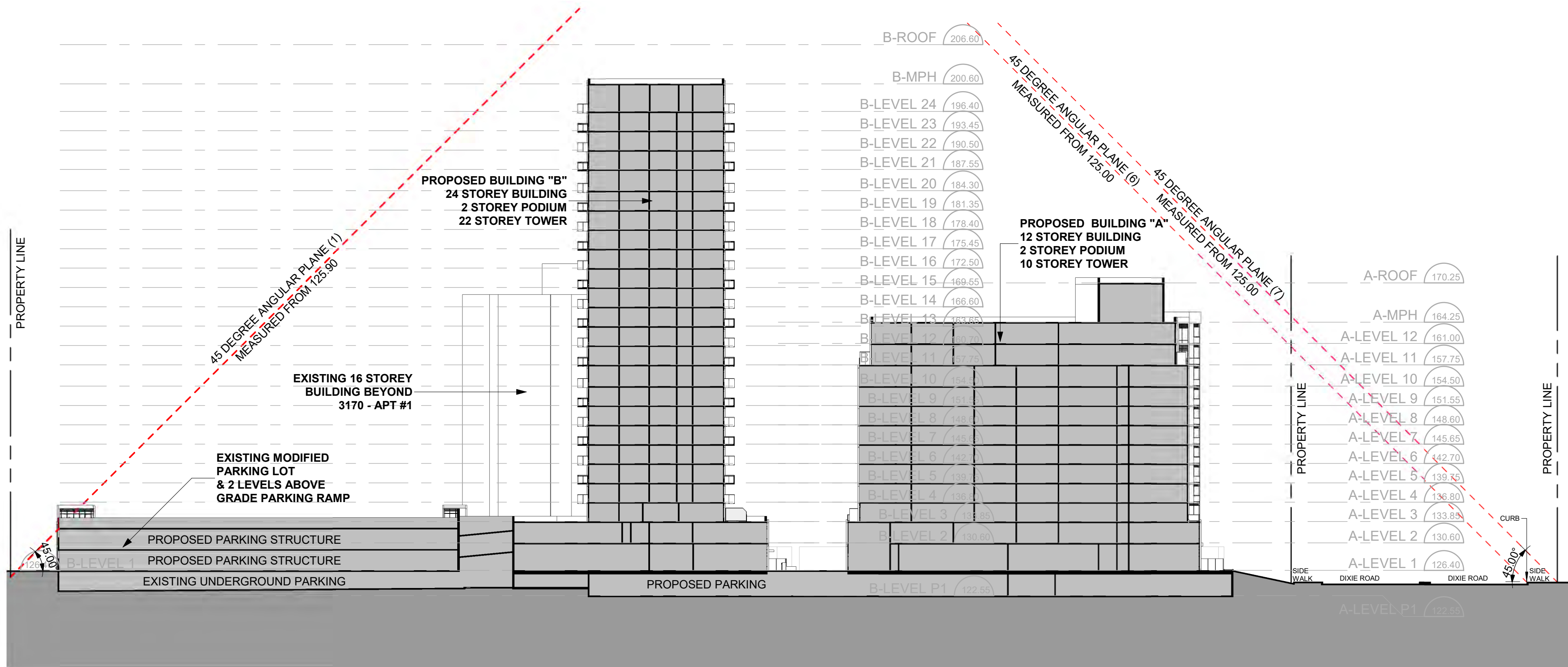
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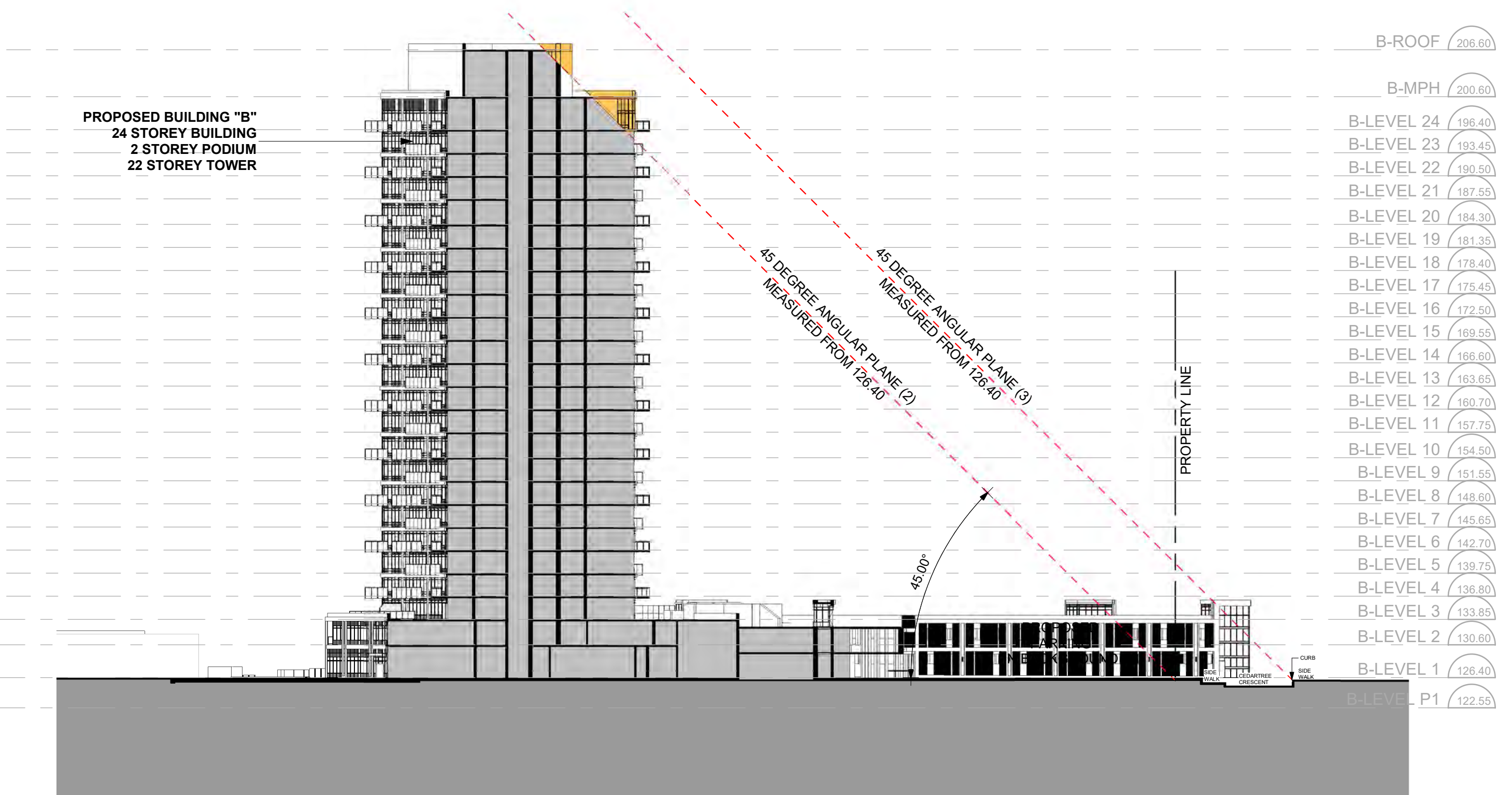
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SUN SHADOW STUDY KEY PLAN
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ANGULAR PLANE - STUDIES - 1, 6 & 7
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ANGULAR PLANE - STUDIES 2 & 3
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2
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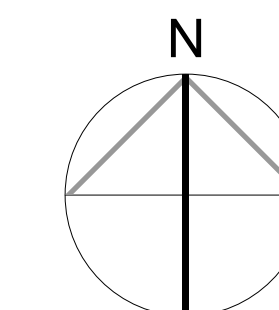
AZURIA
GROUP

Client:
AZURIA GROUP INC.

3150 & 3170 Golden Orchard Drive
Mississauga, ON
Proposed Residential Development

Drawing Title:
Angular Plane Studies

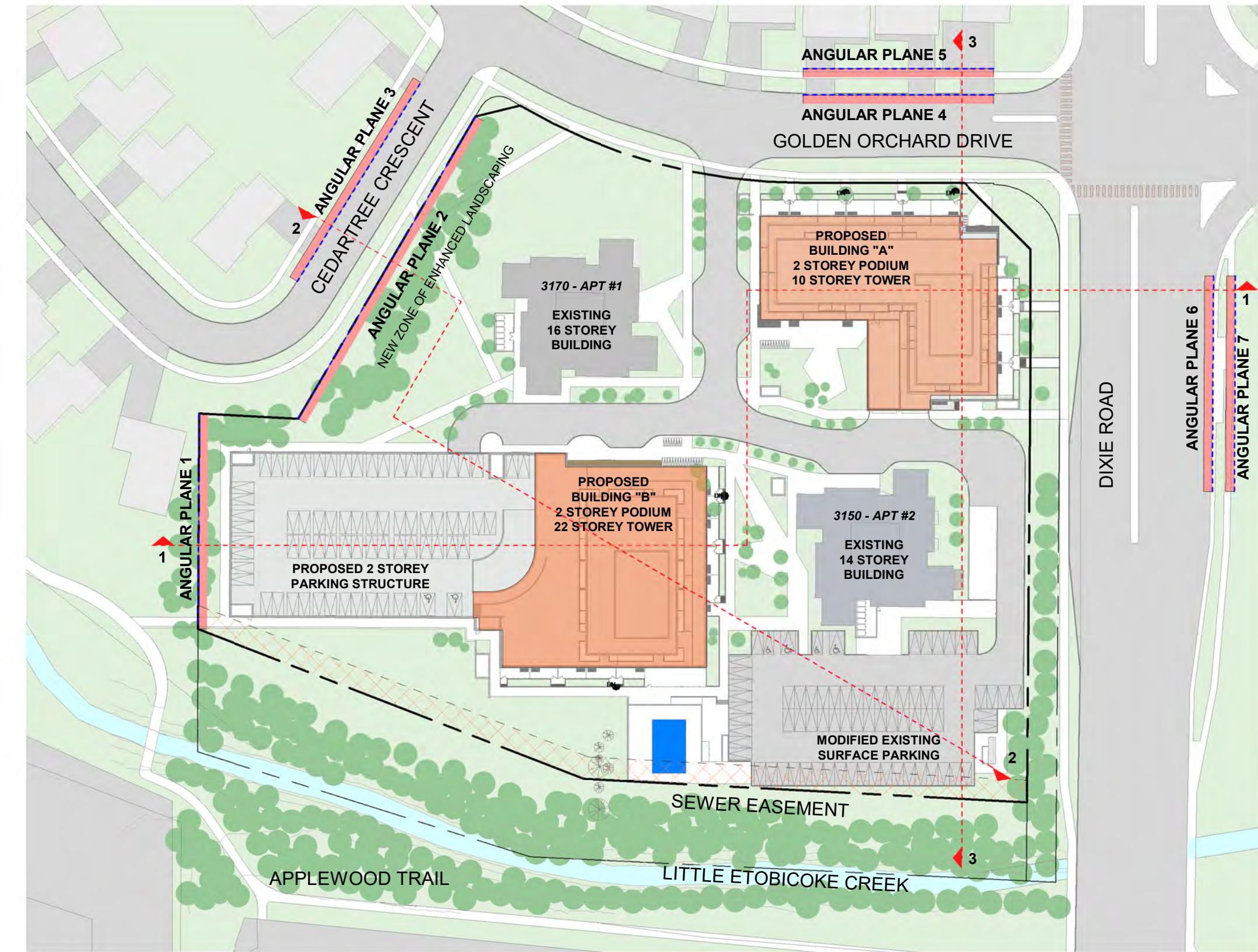
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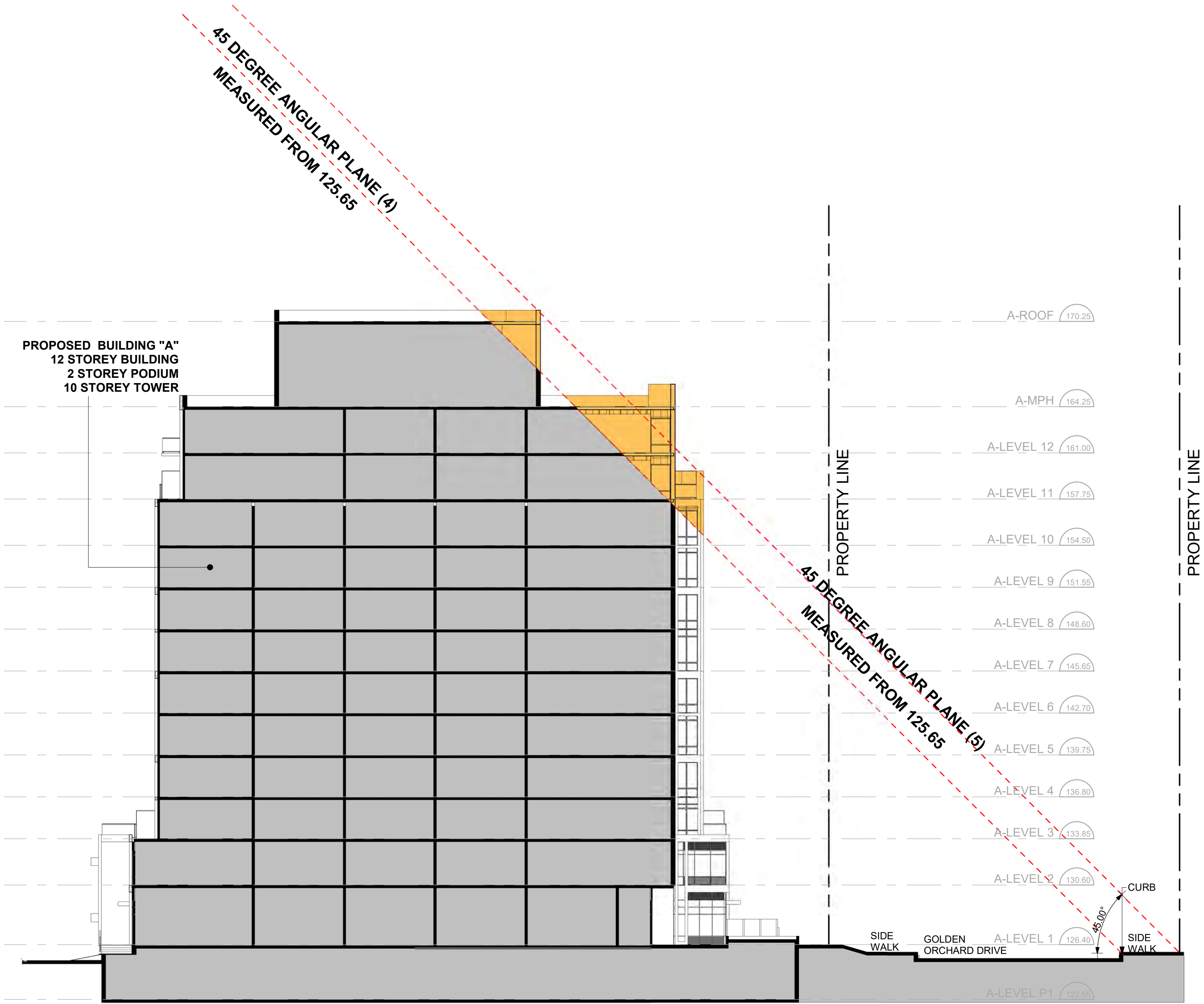
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ANGULAR PLANE 3D STUDIES - 4 & 5
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SUN SHADOW STUDY - KEY PLAN
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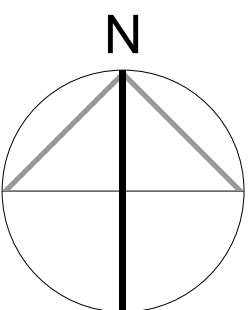
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Client:
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3150 & 3170 Golden Orchard Drive
Mississauga, ON
Proposed Residential Development

Drawing Title:
Angular Plane Studies



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23-034
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Drawing No.:

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Taranjeet Uppal

From: Timothy Harris <timothy@ahmed.group>
Sent: Friday, February 14, 2025 5:53 PM
To: Official Plan
Cc: Moe Ahmed
Subject: Re: [EXTERNAL] New Mississauga Official Plan

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Good Morning, Taranjeet,

Thank you for your email and for sharing the update on the Draft Official Plan. I am writing to formally request the removal of the following policies from the draft (January 2025) Official Plan, as they present significant barriers to context-sensitive development and flexibility in meeting the city's growth and urban design goals. The current provisions fail to fully account for the diversity of urban contexts across Mississauga and could unintentionally hinder effective and sustainable development.

1. Figure 3.2 – High-Rise Development in Neighbourhoods:

The exclusion of **high-rise buildings** from **Neighbourhoods** is a significant limitation to Mississauga's ability to address its growing housing demand. While the focus on **Strategic Growth Areas** such as **Major Transit Station Areas (MTSAs)** and **Growth Centres** is important, the policy should not ignore opportunities for higher-density development in well-connected **Neighbourhoods**. These areas, especially those near transit corridors and major roads, are well-positioned to support higher-density residential or mixed-use developments. By excluding high-rises altogether in **Neighbourhoods**, the policy limits the city's flexibility to adapt to evolving growth patterns. A more flexible approach is needed to allow for **context-specific development** that can address the city's housing needs without being constrained by rigid boundaries. This would ensure that development aligns with local conditions, infrastructure, and future growth projections.

2. Policy 8.3.14 – Incorporating Heritage Resources into Development:

While the conservation of **heritage resources** is crucial to preserving the character of Mississauga, the blanket requirement to **incorporate** these resources into all developments is overly restrictive. Not every development is appropriate for heritage preservation, and mandating the integration of heritage elements without considering the specific context could hinder innovation and compromise the broader goals of urban growth, such as affordable housing or mixed-use development. Instead, a more flexible, **site-specific approach** should be adopted, where **heritage conservation** is considered in the context of **zoning**, the **neighbourhood's character**, and the **overall urban vision**. The policy should allow for **adaptive reuse** of heritage resources where feasible, while also acknowledging that not every development will benefit from preserving or incorporating heritage elements. This will ensure heritage preservation remains a priority, but not at the expense of broader community needs.

3. Policy 8.6.1.8 – Minimum 30-Metre Separation Distance:

The requirement for a **30-metre separation distance** between building components greater than **six storeys** is overly rigid and does not account for the urban context in which these developments are taking place. While separation distances are important for maintaining **livability** and ensuring **adequate light and air**, this blanket policy fails to recognize that in some **Strategic Growth Areas**—such as near transit corridors and **Major Transit Station Areas (MTSAs)**—higher-density development is necessary to meet the city's growth objectives. In these areas, a more flexible approach to **separation distances** is required, taking into account **site-specific factors** such as **zoning, surrounding land uses, infrastructure capacity, and transit access**. By imposing a uniform 30-metre requirement across all developments, this policy could unnecessarily limit the potential for **efficient land use** and **sustainable urban growth**. A more nuanced, **site-specific approach** would ensure that density is maximized where it is most appropriate, without sacrificing quality of life for residents.

4. Policy 8.4.1.17 – Built Form Related to Street Width:

The policy requiring that **built form** must **relate to the width of the street right-of-way** is too rigid and doesn't reflect the complexity of urban design. While **street width** is an important consideration, **urban form** should be driven by a **comprehensive analysis** of **site-specific conditions**, including **surrounding land uses, pedestrian activity, transit access, and zoning**. The relationship between built form and street width should not be a determinant in how development is shaped. In areas designated for **higher density** or **transit-oriented development**, it is more appropriate to focus on factors such as **building function, pedestrian experience, and urban integration**, rather than being constrained by the physical width of the street. A more flexible, **context-sensitive approach** to urban design will ensure that development aligns with the broader urban vision while respecting the unique conditions of each site.

Conclusion:

These policies, while well-intentioned, impose significant constraints that limit the city's ability to accommodate the growing population, create flexible and adaptable urban environments, and respond to the unique conditions of each site. We respectfully request that these policies be **removed or revised** to allow for a more **context-sensitive, flexible approach** to urban development that better aligns with Mississauga's growth and long-term sustainability goals.

We appreciate your consideration of these concerns and would welcome the opportunity to discuss them further. Please let us know if additional information is required.

Best regards,



AHMED GRC

Timothy Harris
COO

A 1-1024 Dundas Street East, Mississauga, Ontario L4Y 2B8
D (289) 275-0220 P (905) 949-0999 Ext.122 F (905) 949-9489
E Timothy@Ahmed.Group W <http://www.Ahmed.Group/>

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On Fri, Jan 24, 2025 at 10:49 AM Official Plan <Official.Plan@mississauga.ca> wrote:

Good Morning Timothy,

Here are the answers to your questions:

1. A report to the Planning and Development Committee will be brought forward at the end of March to seek adoption of the new Official Plan. If adopted, the Official Plan will be sent to the Province (Ministry of Municipal Affairs and Housing) for review and approval.
2. Please provide your comments to this email address no later than **February 14th**.
3. A new version of the Draft Official Plan has been posted on our website and can be viewed here:
<https://yoursay.mississauga.ca/official-plan-review>

Thank you for your comments, we have added you to the mailing list to receive future notifications.



Taranjeet Uppal

Planning Associate, Official Plan and Planning Data Initiatives

T 905-615-3200 ext. 3817

taranjeet.uppal@mississauga.ca

[City of Mississauga](#) | Planning and Building Department,

City Planning Strategies Division

From: Timothy Harris <timothy@ahmed.group>

Sent: Thursday, January 9, 2025 1:13 PM

To: Official Plan <Official.Plan@mississauga.ca>

[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.]

Good afternoon, Amina and Ben,

I hope all is well. I have a few quick questions:

1. When is the official plan expected to come into effect?
2. Are there any legal deadlines for formal comments to be received?
3. How many more iterations are expected?

Please keep us on the mailing list, as we have concerns with the proposed official plan and intend to make submissions.

Thank you,



Timothy Harris
COO

AHMED GRC

A 1-1024 Dundas Street East, Mississauga, Ontario L4Y 2B8
D (289) 275-0220 **P** (905) 949-0999 Ext.122 **F** (905) 949-9489
E Timothy@Ahmed.Group **W** <http://www.Ahmed.Group/>

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February 14, 2025

GSAI File: 1016-010

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
Morguard NAR (Ontario) Holdings Limited
2896 Battleford Road, City of Mississauga**

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Morguard NAR (Ontario) Holdings Limited (the "Owner") of the lands municipally known as 2896 Battleford 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 Letter, submitted by GSAI, dated March 15, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

Background Information:

As Staff and Council are aware, the Owner and 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 in January 2025.

The Site, municipally known as 2896 Battleford Road, is located on the northwest quadrant of Battleford Road and Glen Erin Drive. It is currently improved with a low-rise rental townhouse complex. The Site is also adjacent to the retail plaza referred to as Meadowvale Town Centre. Based on the in-effect planning policy framework, the Site is located within the Meadowvale Community Node Character Area, is in proximity to transit services including a transit terminal at the periphery of the Meadowvale Town Centre lands 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 redevelopment potential.

Concerns Related to the Draft Mississauga Official Plan 2051:

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns previously raised have been addressed through the removal of certain policies, two (2) concerns remain. These are described below.

1. Land Use

Chapter 11, Land Use Designations provides the City's refined built-form based policy framework. We remain concerned with the transition to a built-form based policy framework. More specifically, the proposed transition from the Site being designated to 'Residential High-Rise' from the in-effect designation of 'Residential High-Density; does not guarantee the same permissions going forward. We respectfully request that should the built form-based policy framework proceed, that the land use designation framework established in Chapter 11 ensure that in-effect policy permissions are transferred appropriately. For clarity, we are prepared to support the re-designation of the Site so long as no development permissions are compromised.

2. Transition

Chapter 8 provides the refined built form and site development policy framework. We remain concerned that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c), Policy 8.6.2.5, and Policy 8.6.2.6. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that Policy 8.6.2.6 states that transition is to be provided between Strategic Growth Areas and adjacent Neighbourhoods. Given the Site's location at the periphery of the existing Meadowvale Growth Node, this policy is concerning. Additionally, following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning as we believe they are overly restrictive and unnecessary. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is concerning. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. If this policy is not met, an Official Plan Amendment would be required,

notwithstanding that a redevelopment proposal may be appropriate. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force which highlighted that urban design considerations can be an added hurdle or hindrance to expedited development approvals. This would be case if urban design guidelines became policy as proposed. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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. Mayor Parrish and Members of Council
Owner

February 14, 2025

GSAI File: 1016-010

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

RE: **Mississauga Official Plan 2051**
 Morguard MCC Limited
 33, 55, 77 and 201 City Centre Drive, City of Mississauga

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Morguard MCC Limited (the "Owner") of the lands municipally known as 33, 55, 77 and 201 City Centre Drive, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letter, submitted by GSAI, dated March 15, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

As Staff and Council are aware, the Owner and 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 in January 2025.

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns previously raised have been addressed through the removal of certain policies, two (2) concerns remain. Our comments are further described below.

1. *Built Form*

Chapter 8 provides the City's refined built form and site development policy framework. We remain concerned with the transition to a built-form based policy framework. In particular, we are concerned with the proposed land use designation framework based on built form which can serve to restrict development opportunities rather than fostering them. In particular, the built form-based policy framework is overly prescriptive and elevates urban design guidance to policy. For example, the general built form and site development policies contained in Chapter 8 of the draft Official Plan serve to restrict development opportunities, implement restrictive built form policies such as requiring that a built form relate to the right-of-way onto which it fronts, implements restrictive setback requirements, implements restrictive podium-tower requirements and also implements a restrictive minimum 30 metre tower separation as policy, whereas

tower separation was formally outlined in the area-specific Built Form Standards. We request that the elevation of urban design guidance to policy and the built-form based policy framework be revised to enable flexibility and high-quality built forms that effectively and appropriately respond to local conditions.

2 Transition

Given that Chapter 8 provides the refined built form and site development policy framework, we remain concerned that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c), Policy 8.6.2.5, and 8.6.2.6. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning as we believe they are overly restrictive and unnecessary. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is concerning. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. If this policy is not met, an Official Plan Amendment would become necessary, notwithstanding that a redevelopment proposal may be appropriate. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force which highlighted that urban design considerations can be an added hurdle or hindrance to expedited development approvals. This would be the case if

urban design guidelines became policy as proposed. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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. Mayor Parrish and Members of Council
Owner

February 14, 2025

GSAI File: 1016-010

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
Aspen Apartments (Building C) Limited and Aspen Apartments (Building B) Limited
1477, 1547 Mississauga Valley Boulevard, City of Mississauga**

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Aspen Apartments (Building C) Limited and Aspen Apartments (Building B) Limited (cob as Morguard Corporation) (the "Owner") of the lands municipally known as 1477 and 1547 Mississauga Valley 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 Letter, submitted by GSAI, dated March 15, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

Background Information:

As Staff and Council are aware, the Owner and 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 in January 2025.

The Site, municipally known as 1477 and 1547 Mississauga Valley Boulevard, is an assembly of two parcels which are collectively located on the north side of Central Parkway East, east and south of Mississauga Valley Boulevard. The Subject Lands are currently improved with a two high rise rental apartment buildings and a vacant parcel of land (immediately east of the Metro grocery store). The Site has a gentle rolling topography owing to the presence of a forested area within the northern and eastern quadrants of the Site. The Site is also located within a comfortable walking distance of the Hazel McCallion Light Rail Transit (LRT) network and as such, is located within the Fairview Protected Major Transit Station Area. Based on the in-effect planning policy framework, the Site is located within the Downtown Fairview Character Area, is in proximity to transit services and is designated 'Mixed Use' (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the undeveloped vacant portion of the Site has recognized development potential.

Concerns Related to the Draft Mississauga Official Plan 2051:

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns previously raised have been addressed through the removal of certain policies, two (2) aspects remain. These are described below.

1. *Transition*

Chapter 8 provides the refined built form and site development policy framework. We remain concerned with the transition to a built-form based policy framework and that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c), Policy 8.6.2.5 and Policy 8.6.2.6. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that Policy 8.6.2.6 states that transition is to be provided between Strategic Growth Areas and adjacent Neighbourhoods. Given the Site's location at the periphery of the Fairview Growth Node and adjacent to a Neighbourhood, this policy is concerning. Additionally, following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning as we believe they are overly restrictive and unnecessary. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is concerning. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. If this policy is not met, an Official Plan Amendment would be required, notwithstanding that a redevelopment proposal may be appropriate. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will

restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force which highlighted that urban design considerations can be an added hurdle or hindrance to expedited development approvals. This would be the case if urban design guidelines became policy as proposed. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

2. Additional Height Permissions

Chapter 11 of the draft Official Plan contains the City's Major Transit Station Area policy framework. As stated above, the Subject Lands are located within a delineated Projected Major Transit Station Area and has recognized development potential. We support the current Major Transit Station Area policy framework, including the additional height permissions identified in Schedule 8 for PMTSA lands. Of relevance to the Site, Schedule 8 establishes that the maximum permitted height for the Site is 25 storeys and a maximum density as a measure of Floor Space Index is not identified. Given the variation of maximum permitted building heights, particularly on the east and west side of Hurontario Street which are awarded heights of up to 35 storeys, we request that the maximum height permission for the Subject Lands be increased to also be 35 storeys. In our opinion, this increased height permission is appropriate given the Site is located within a delineated Strategic Growth Area, is within a comfortable walking distance of existing and planned transit services, and has unique locational attributes that will enable visual screening of height and massing to the adjacent Neighbourhood area to be provided. If the building height is not increased, this would likely necessitate an unwarranted and costly privately-initiated Official Plan Amendment to implement Provincial objectives and good planning

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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

Stephanie Matveeva, MCIP, RPP

Partner

Associate

cc. Mayor Parrish and Members of Council
Owner

February 14, 2025

GSAI File: 1016-010

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
Morguard Realty Holdings Inc.
1891 Rathburn Road East, City of Mississauga**

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Morguard Realty Holdings Inc. (the "Owner") of the lands municipally known as 1891 Rathburn Road East, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letter, submitted by GSAI, dated March 15, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

Background Information:

As Staff and Council are aware, the Owner and GSAI have 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 in January 2025.

The Site, municipally known as 1891 Rathburn Road East, is located on the east side of Rathburn Road East, north of Burnhamthorpe Road East. It is currently improved with a local retail plaza (referred to as the 'Kingsbury Centre') comprised of a low-rise, multi-tenant commercial structure and surface parking area. The Site is located adjacent to and is surrounded by an established Neighbourhood. Based on the in-effect planning policy framework, the Site is located within the Rathwood Neighbourhood Character Area, is in proximity to street-level transit services 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.

Concerns Related to the Draft Mississauga Official Plan 2051:

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns previously raised have been addressed through the removal of certain policies, six (6) concerns remain. These are described below.

1. City Structure

Chapter 3, Managing Growth presents a refined growth management framework for the City. More specifically, Chapter 3 outlines how growth and development is to be managed across the City up to the year 2051 in accordance with a refined City Structure. Chapter 3.3 and a revised Schedule 1 provide further direction and clarity on the current, proposed City Structure framework. We highlight that the Subject Lands continue to be identified as being located within the Rathwood Neighbourhood Character 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 a refined, optimized, redevelopment form in an appropriate location in the future. We remain of the opinion that greater flexibility is required in terms of maximum permitted heights in Neighbourhoods to enable contextually appropriate development to be introduced.

2. Housing

Chapter 5 presents the refined housing-related policy framework for lands across the City. We remain concerned with Policies 5.2.3, 5.2.4 and Table 5.1 as drafted. For brevity, we will not repeat the policies nor the Table as drafted. However, use of Region-wide housing targets, as established by Policy 5.2.4 and Table 5.1 is concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Additionally, Policy 5.2.4 and Table 5.1 which state that 30% of all new housing units, regardless of a property's location, are to be affordable housing units is contrary to in-effect legislation as well as Provincial and Regional policy objectives which collectively state that affordable housing units are legislated requirements only in Inclusionary Zoning Areas. Given the Site is located outside of an Inclusionary Zoning Area, the decision of whether affordable units will be provided should remain up to a property owner's discretion. We respectfully request the policy and Table, as drafted, to be revised.

Lastly, we remain concerned with Policy 5.2.3 as drafted which encourages developments containing 50 or more units to provide 50% of units as family-sized or two and three bedroom units. While we understand the intent of the policy and appreciate use of the word 'encourage', the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. Additionally, encouragement of larger, family-sized units does not always reflect market trends or the reality that housing options for families will require a selection of housing units and price points. We continue to request that Policy 5.2.3 be modified to encourage a reduced percentage (25% or less) of family-sized units or remove this policy to remove a barrier to the delivery of much needed housing units in appropriate locations across the City.

3. Transition

Chapter 8 provides the refined built form and site development policy framework. We remain concerned that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c) and Policy 8.6.2.5. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning as we believe they are overly restrictive and unnecessary. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is concerning. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. If this policy is not met, an Official Plan Amendment would be required, notwithstanding that a redevelopment proposal may be appropriate. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force which highlighted that urban design considerations can be an added hurdle or hindrance to expedited development approvals. This would be the case if urban design guidelines became policy as proposed. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

4. Open Space & Amenity Areas

Section 8.4.5 provides a refined open space and amenity area policy framework for lands across the City. While we support the policy direction to recognize that open spaces of varying forms can complement and support public spaces such as public parks, we remain concerned with Policy 8.4.5.2 which states:

- '8.4.5.2. *Privately Owned Public Spaces (POPS) contribute to the public realm. These spaces, where appropriate, will be designed and maintained in accordance with the standards established by the City, and remain open and universally accessible to public. POPS provided to the City will:*
- a) *provide a public easement over the extent of the POPS; and*

- b) the size, extent, design, configuration and program of POPS will be done in consultation and to the satisfaction of the City.'*

The above-noted policy as drafted remains concerning and requires revision. In short, a policy requirement that a Privately Owned, Publicly Accessible Space (POPS) be designed in accordance with a City Standard is unnecessarily restrictive and does not afford sufficient flexibility. It is also unreasonable given that the City does not consider the provision of POPS as parkland dedication. The location, design and ultimate programming of a POPS space within a development can vary depending on site-specific contexts and circumstances. Requiring that a POPS space be designed in accordance with a City Standard does not adequately reflect the above-noted variation and flexibility. Furthermore, there is no current City Standard for POPS. Therefore, a policy requirement that a POPS be designed to conform to a City Standard that does not yet exist is premature. We request that this policy be modified to remove reference to a City Standard. This would enable the provision of POPS to remain flexible and continue to support the provision of open spaces of varying sizes to support the needs of residents.

5 Built Form

We remain concerned with the transition to a built-form based policy framework. Section 8.6 provides a policy framework regarding the provision of built forms and site organization aspects. We remain concerned with the phrasing of Chapter 8.6.1 and the policy description of how a low, mid- or high-rise building is to be characterized. Most concerning is the definition of a mid-rise building which states that a mid-rise building “is generally higher than four storeys with maximum heights prescribed by area-specific policies and land use designations. Their height should be designed to consider the width of the street right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context”. In our opinion, restricting a mid-rise building to being generally 4 to 8 storeys in height (when the area-specific and land use designation policies are considered collectively) is unnecessarily restrictive, does not afford sufficient flexibility for high-quality, contextually appropriate built forms to be introduced and is not good practice. As Staff are aware, mid-rise structures in neighbouring jurisdictions can and often do have differing heights. For example, the City of Brampton considers a mid-rise building to be up to 12 storeys, while the City of Toronto can consider a structure to be a mid-rise building with heights that are much greater than 12 storeys. The policy limitation of a mid-rise building having a maximum height of 8 storeys is artificially low and will challenge the delivery of much needed, high-quality development in appropriate locations. Furthermore, the requirement that a mid-rise building consider the width of the street Right-of-Way onto which it fronts remains restrictive, is ambiguous and may be misinterpreted to restrict development in appropriate locations. Overall, for the reasons outlined above, we request that the policy definition of a building be modified to provide as much flexibility as possible.

6 Non-Residential Floor Area Replacement

By way of context, the Subject Lands are currently designated ‘Mixed Use’ by the in-effect and by the draft Mississauga Official Plan. Based on the current and proposed policy framework, we are concerned with the evolving Mixed Use policy framework.

As drafted, Policy 10.2.6.3 requires replacement of existing retail and service commercial space when development is proposed. As drafted, the policy is unclear and requires modification. The policy, which can be interpreted as requiring a degree of retail replacement space, is also unnecessarily restrictive, will hinder development and does not adequately reflect the post-pandemic market. Requiring a development to provide the same or even a significant percentage of

existing non-residential space to be replaced in a development does not adequately capture market trends, does not enable a property owner to 'right-size' the space to avoid significant void areas and does not reflect best practices. In our opinion, this policy is premature given there is in-effect Provincial direction to encourage underutilized plazas to redevelop to support the provision of housing. It is also premature given the City is currently undertaking a Retail Market Study to better understand where retail may be needed and the type of retail that is needed to support community needs. Rather than requiring a minimum percentage of existing non-residential space to remain, we request a policy mechanism that would permit an appropriate amount of ground-level non-residential space based on the findings of a Market Impact Assessment, to the satisfaction of Staff. This policy mechanism would enable sufficient flexibility as development of underutilized retail plazas come forward and a way for development to proceed in a manner that supports Provincial and local objectives.

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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. Mayor Parrish and Members of Council
Owner

February 14, 2025

GSAI File: 1319-001

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

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 pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

As Staff and Council are aware, 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 in January 2025.

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns have been addressed through the removal of select policies, a number of the concerns previously raised in the March 15, 2024 Comment Letter remain. For brevity, we will not repeat all concerning policies provided in the March 15, 2024 Comment Letter but rather offer the following comments.

Chapter 17: Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 17 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area policies. While we support the transition to a refined policy framework that balances the Provincial and local objectives, we also request that a housekeeping Amendment be provided at the appropriate time in the future to recognize and implement the forthcoming development approval and new Special Site policy that will apply to the Subject Lands that is being considered at the March 3, 2025 Planning and Development Committee meeting.

Conclusion

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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. Mayor Parrish and Members of Council
Equity Three Holdings Inc.
Mattamy Homes
Anne Benedetti, Goodmans

February 14, 2025

GSAI File: Various

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
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. As Staff and Council are aware, 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.

Further to our comments expressed in the Comment Letter, dated March 14, 2024, this Letter provides our general comments on the draft Mississauga Official Plan 2051, released in January 2025. Our comments are presented below in accordance with the proposed structure of the draft Mississauga Official Plan 2051.

Chapter 3, Directing New Development

Chapter 3 provides the City's growth management policy framework. While we support the need for a revised policy framework, we support a selection of policies and remain concerned with others. Our comments are outlined below.

'3.2.4. Most of Mississauga's future growth will be directed to Strategic Growth Areas, which are the Downtown, Growth Centres, Growth Nodes and Major Transit Station Areas.'

We support the above-noted policy. Directing development to delineated Strategic Growth Areas is not only good policy but it is consistent with Provincial objectives as outlined in the Provincial Planning Statement, 2024. It will also continue to ensure that development is directed to

appropriate locations across the City. However, directing development to Strategic Growth Areas must be supported by infrastructure investments to ensure that the needs of community members are satisfactorily addressed which is a responsibility that rests with the City and/or the Region. Infrastructure investments that reflect the priority areas for growth, while balancing the needs of other areas of the City, is critical for directing and achieving smart growth and supporting redevelopment opportunities and intensification.

Chapter 3.3 contains a revised City Structure framework. More specifically, there have been refinements and re-classification of certain components of the City Structure. This includes the previous Uptown Major Node being elevated to the Growth Centre classification, the previous Downtown Character Area being redefined to exclude the Downtown Core area and the remainder of the Fairview, Cooksville and Hospital communities being categorized as Growth Centre lands and the removal of the Major Node and Community Node categorizations in favour of a new category referred to as Growth Nodes. Additionally, the previous category of Intensification Areas has been removed. Based on the above and the policies as drafted in Chapter 3.3 to respond to the re-classifications, we generally support revisions to the City Structure to reflect current trends and policy objectives. We note and would respectively repeat our previously documented comments seeking revisions to the Central Erin Mills Growth Node, Dixie-Dundas Growth Node and Port Credit Growth Node boundaries to enable contextually appropriate development to occur on lands that are in proximity to transit services and would support Provincial and local objectives.

Chapter 4, Sustaining the Natural Environment

Chapter 4 presents the City's natural environment policy framework. This includes policies related to a changing climate. We are concerned with Policy 4.2.2 which states:

'4.2.2. Mississauga will support the planning and design of new communities and buildings that aim to achieve near net zero emissions.'

The above-noted policy as drafted is concerning and requires revision. While we understand and support a policy framework that supports a response to a changing climate, the above-noted policy as drafted has (while potentially inadvertent) significant and adversely impacts for development. More specifically, a policy that requires buildings to aim to achieve near net zero emissions will require significant investment and resources much earlier in the development approval process (potentially during the Official Plan Amendment and/or Zoning By-law Amendment stage) than is currently contemplated. As an example, the City of Mississauga recently adopted a revised Green Development Standard in order to achieve sustainability objectives. Currently, the City of Mississauga Green Development Standard (the 'Standard') establishes a minimum score that must be adhered to. The Standard also only applies to those development applications that are proceeding through the Site Plan Control or Site Plan Approval process, and appropriately, the

Standard is handled through that process, when buildings and their components are more evolved or refined. The above-noted policy will have the indirect consequence of requiring significant investments in the earliest development approval stages in order for a developer to find a context-specific and economically appropriate solution for achieving near net zero emissions. It may also require additional supporting application materials to be prepared and as such, will pass additional costs on to the end user and would require further discussion or negotiation with staff and a proponent to find a mutually agreeable resolution. We find the language “near net zero” to be open ended and ultimately, we question how this is enforceable in a policy context. It begs the question on how much time and discussion will be had at an early stage in order to reasonably satisfy this policy. We would encourage staff to remove this policy and continue to use the Green Development Standard Tool where required which has recently been updated.

In order to implement the Mayor’s Task Force and Housing Pledge objectives of building more housing, we respectfully request that this policy be removed as it will only add barriers to developments reaching implementation stages.

Chapter 4 also presents a framework to guide how public parkland dedication is to occur. This includes Policy 4.3.5.5 which states:

‘4.3.5.5. The minimum park provision will be equivalent to:

- a. 12 percent of the total area of the Growth Centre and Growth Nodes; or*
- b. 1.2 hectares per 1,000 population in all other residential parts of the City.’*

In our opinion, the above-noted policy should be revised to reference the minimum parkland dedication requirements established by the Planning Act, rather than the above which is derived from the City of Mississauga’s Parks Master Plan.

Chapter 5, Housing Choices and Affordable Homes

Chapter 5 presents the City’s refined housing policy framework. As further outlined in our previous Comment Letter, dated March 14, 2024, we remain concerned with Policies 5.2.3, 5.2.4 and Table 5.1 as drafted. For brevity, we will not repeat the policies nor the Table as drafted. However, use of Region-wide housing targets, as established by Policy 5.2.4 and Table 5.1 is concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Additionally, Policy 5.2.4 and Table 5.1 which states that 30% of all new housing units, regardless of a property’s location, are to be affordable housing units is contrary to in-effect legislation as well as Provincial and Regional policy objectives which collectively state that affordable housing units are legislated requirements only in Inclusionary Zoning Areas. We request again that Table 5.1 be modified to reflect the City-wide scale and to r

further, request explicit acknowledgment in the policy that affordable housing units cannot be mandated on properties outside of an Inclusionary Zoning Area.

Lastly, we remain concerned with Policy 5.2.3 as drafted which encourages developments containing 50 or more units to provide 50% of units as family-sized or two and three bedroom units. While we understand the intent of the policy and appreciate use of the word ‘encourage’, the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. Additionally, encouragement of larger, family-sized units does not always reflect market trends or the reality that housing options for families will require a selection of housing units and price points. We also have concerns about how enforceable this policy becomes. The latter portion of this policy provides City staff with the opportunity to treat this as more of a ‘requirement’ by offering relief to certain types of development, which in turn, would lead to many discussions and negotiations, effectively slowing the development approvals process.

In addition to these concerns, we remind the City that the Inclusionary Zoning for PMTSAs has been established, and further, that the Housing Assessment requirements have been removed as a required application submission deliverable. We interpret this to mean that the City believes that Inclusionary Zoning is an appropriate response to ensuring affordable housing is provided for, and in turn has identified where new affordable housing is to be placed. We agree with that and encourage the City to allow IZ policies to continue to be the governing metric/parameter in terms of requiring any specific housing. Policy 5.2.3 would frustrate the timely approvals for development applications and present a market barrier by providing for units that may not sell, as evidenced in excerpts from the Mayors Task Force Report from January 2025.

We continue to request that Policy 5.2.3 be modified to encourage a reduced percentage (20% or less) of family-sized units or remove this policy to remove a barrier to the delivery of much needed housing units in appropriate locations across the City.

Inclusionary Zoning

As drafted, the Mississauga Official Plan 2051 has incorporated the City’s Inclusionary Zoning policy framework in accordance with the Council adopted Official Plan Amendment policies and Inclusionary Zoning By-law. As outlined in the March 14, 2024 Comment Letter, we remain concerned with the Inclusionary Zoning policy framework as drafted as it continues to not reflect the reduced affordable unit term of 25 years and the reduced maximum set aside rate in accordance with Bill 23. We request again that the Inclusionary Zoning policy framework be updated to reflect the changes enacted by recent legislation and Provincial priorities.

Chapter 8, Well Designed Healthy Communities

Chapter 8 presents a refined urban design-related policy framework. We remain concerned, and this is further described in relation to the proposed building classifications and land use framework, with the move to a form-based policy framework. As outlined in the March 14, 2024 Comment Letter, we remain concerned with the elevation of urban design guidance to policy. We also remain concerned that the Mississauga Official Plan continues to require certain urban design policy requirements to be met as this is contrary to the evolving direction as outlined by the Mayor's Task Force.

Of particular concern is Policy 8.2.9.c) which states that the City's vision will be supported by site development that demonstrates context sensitivity and transition. A similar concern is shared with Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means or with Policy 8.6.2.6 which states that developments will provide a transition in building height and form between Strategic Growth Areas and adjacent Neighbourhoods with lower heights. Policy 8.6.2.6 is followed by the following illustrative graphic, referred to as Figure 8.9:

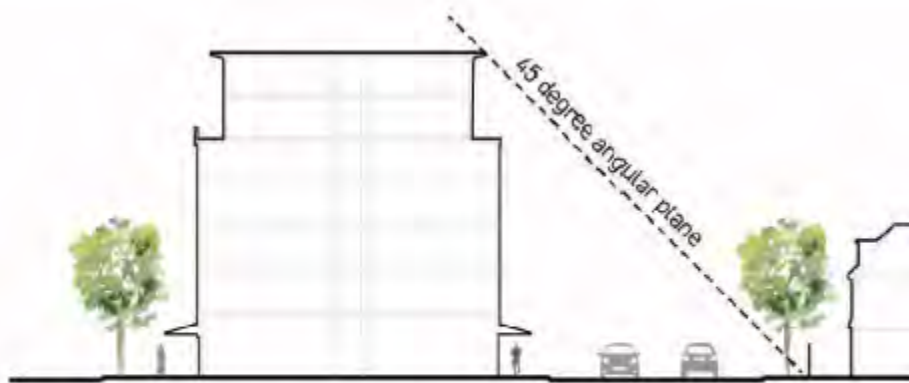


Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning. As the policies as drafted suggest, there are various ways of ensuring appropriate transition can be provided. There is also ambiguity given transition is not a defined term and could lead to subjective or independent interpretations. In our opinion, elevating appropriate transition and requiring it through policy is concerning and is more appropriately handled through urban design guidelines which are more flexible in their application and well suited to recognize and respond to area context and areas in transition. This concern is furthered by the above-noted policies which suggest 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. Furthermore, the policy requirement and

illustrative graphic provided by Figure 8.9 that an angular plane be applied is inconsistent with how transition is to be provided in guiding documents such as the Hurontario Main Street Master Plan and Dundas Connects Master Plan. In our opinion, the angular plane requirement should be removed from 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. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

8.4.5, Open Space and Amenity Areas

Section 8.4.5 provides a policy framework regarding open space and amenity areas. While we support the policy direction to recognize that open spaces of varying forms can complement and support public spaces such as public parks, we remain concerned with Policy 8.4.5.2 which states:

'8.4.5.2. Privately Owned Public Spaces (POPS) contribute to the public realm. These spaces, where appropriate, will be designed and maintained in accordance with the standards established by the City, and remain open and universally accessible to public. POPS provided to the City will:

- a) provide a public easement over the extent of the POPS; and*
- b) the size, extent, design, configuration and program of POPS will be done in consultation and to the satisfaction of the City.'*

The above-noted policy as drafted is concerning and requires revision. To begin, a policy requirement that a Privately Owned, Publicly Accessible Space (POPS) be designed in accordance with a City Standard is unnecessarily restrictive and does not afford sufficient flexibility to achieve contextually/locationally appropriate open space design. The location, design and ultimate programming of a POPS space within a development can vary depending on site-specific contexts and circumstances. Requiring that a POPS space be designed in accordance with a City Standard does not adequately reflect the above-noted variations and take into consideration any necessary flexibility in designing open spaces. Requiring that a POPS space be designed in accordance with a City Standard does not adequately reflect the above-noted variation and flexibility. Furthermore, there is no current City Standard for POPS. Therefore, a policy requirement that a POPS be designed to conform to a City Standard that does not yet exist is premature. We request that this policy be modified to remove reference to a City Standard. This would enable the provision of POPS to remain flexible and continue to support the provision of open spaces of varying sizes to support the needs of future and existing residents.

8.6, Buildings and Site Development

Section 8.6 provides a policy framework regarding the provision of built forms and site organization. We remain concerned with the phrasing of Chapter 8.6.1 and the policy description of how a low, mid- or high-rise building is to be understood. Most concerning is the definition of a mid-rise building which states that a mid-rise building “is generally higher than four storeys with maximum heights prescribed by area-specific policies and land use designations. Their height should be designed to consider the width of the street right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context”. While we acknowledge that between the previous draft Official Plan released in February 2024 and the current iteration, the definition of a mid-rise building has been improved, we remain concerned. In our opinion, restricting a mid-rise building to being generally 4 to 8 storeys in height (when the area-specific and land use designation policies are considered collectively) is unnecessary. As Staff are aware, mid-rise structures in neighbouring jurisdictions can and often do have differing heights. For example, the City of Brampton considers a mid-rise building to be up to 12 storeys, while the City of Toronto can consider a structure to be a mid-rise building with heights that are greater than 12 storeys. The policy limitation of a mid-rise building having a maximum height of 8 storeys is artificially low and will challenge the delivery of much needed, high-quality development in appropriate locations by adding further policy barriers and requiring site specific amendments. From these external examples, it would appear there are ways to consider building height along a rights-of-way without the street width and a typically referenced rigid angular plane or other urban design-inspired policies. Furthermore, the requirement that a mid-rise building consider the width of the street Right-of-Way onto which it fronts remains restrictive and does not adequately account for site-specific contexts (for example, a higher-order road, Arterial, Collector, local road or laneway). This policy will serve to restrict development in appropriate locations. Overall, for the reasons outlined above, we request that the policy definition of a mid-rise building be modified to provide as much flexibility as possible.

Chapter 10, Land Use Designations

Revisions are contemplated to the City’s land use designation framework. More specifically, the Mississauga Official Plan as drafted contemplates an evolution towards a built form-based policy framework. As expressed in our previous Comment Letter, we remain concerned with this evolution and the draft policy framework. In our opinion, the proposed land use framework continues to result in instances where properties are to be re-designated and this is akin to down designations which would result in the loss of as-of-right development permissions and ultimately result in more privately initiated, site specific Official Plan Amendments which could have otherwise been avoided.

Furthermore, the proposed land use designations do not provide the same flexibility as the current in-effect policy framework. We are also concerned with the introduction of further maximum height limitations, based on a property's built form-based land use. For example, Policy 10.2.5.10 which states that lands designated Residential High-Rise will permit maximum height as specified in the Character Area or Special Site provisions, or if heights are not specified, then the maximum allowable height will not be greater than the tallest existing building on the property. This policy as drafted is overly restrictive, contrary to good practice and should be removed. Existing buildings and their associated site conditions were approved under different planning regimes, applicable building/design requirements, as well as market conditions and should not necessarily be used as a benchmark with today's reality. We continue to encourage the City to employ urban design guidelines and review through the development approvals process to determine contextually appropriate heights (and massing). This presents a more flexible and opportunistic approach and responds to optimizing or leveraging otherwise underutilized sites across the City and allows the flexibility on a site by site, or area by area basis to respond to the City structure.

Mixed Use Lands

In addition to the above, we are concerned with Policies 10.2.6.3 and 10.2.6.4. More specifically, Policy 10.2.6.3 states that on lands designated Mixed Use, a minimum amount of non-residential replacement Gross Floor Area (GFA) will be required based on the greater of two (2) scenarios. As drafted, the wording of the scenarios is unclear and is concerning. Furthermore, a policy requiring that a minimum amount of existing non-residential GFA be replaced in a development is unnecessarily restrictive, does not reflect the post-pandemic market and trends, will serve to prevent an ability to 'right-size' non-residential spaces based on market trends and end-user needs and is contrary to best practices. Additionally, policies such as Policy 10.2.6.3 is premature in our opinion given the City has just begun a Retail Needs Study. Any future policies related to requiring non-residential areas should be informed by the outcome of the Retail Needs Study to avoid the need for Official Plan Amendments going forward. In our opinion, the policy should be removed. If removal is not to be considered, then we request that the policy be revised to clearly specify when replacement GFA is to be required and to provide a policy mechanism that should a Market Needs Analysis be provided to the satisfaction of Staff, replacement GFA will not be required without the need for an Official Plan Amendment.

We are similarly concerned with Policy 10.2.6.5 which states that where lands are within a Strategic Growth Area, are designated Mixed Use and contain substantial office uses, development will be required to maintain the existing GFA of these uses. As outlined above, we request that this policy be removed or alternatively, be revised to permit a reduction in office GFA. A policy which would permit a reduction in existing office GFA is important given the post-pandemic trends, a significant vacancy rate for office and would enable property owners to right-size the non-residential areas included in a development proposal to reflect market trends, end-user needs

and to ensure the non-residential areas can be occupied to support complete community objectives and vibrant public realms. If left as written today, the overwhelming metric could result in dangerous and unappealing retail space vacancies in new projects due to oversupply and effectively render valuable street frontage spaces unused, tarnishing the City's vision for active street frontages and animated streetscapes.

Lastly, Policy 10.2.6.4 which states that maximum building heights specified by Character Area, Protected Major Transit Station Area or Special Site policies for designated Mixed Use lands may be exceeded by a maximum of 3 storeys in order to accommodate non-residential uses above the ground floor is restrictive.

Mixed Use Limited

We support the introduction of the Mixed Use Limited land use designation. In our opinion, this designation will support development objectives and will facilitate residential or mixed-use development to occur in appropriate locations, provided the evaluation criteria established by Policy 10.2.7.4 is sufficiently satisfied. . In fact, we would suggest that the City consider applying the Mixed-Use Limited designation on other lands in the City which are located within areas in transition such as the Clarkson GO Station lands. We also highlight that the evaluation criteria of Policy 10.2.7.4 is consistent with Provincial objectives as outlined in the Provincial Planning Statement, 2024.

Chapter 11, Transit Communities

Revisions are contemplated to the City's transit and Major Transit Station Area policy framework. Specifically, Chapter 11 as drafted will provide clear, succinct policy direction for how transit-supportive development is to be achieved and how lands within delineated Major Transit Station Areas are to develop over the long-term. Overall, we support the policy framework established by Chapter 11 and support the inclusion of refined policies. These refined policies include Policies 11.3.3.2 which permits additional height within a delineated Protected Major Transit Station Area (PMTSA) subject to satisfying evaluation criteria and Policy 11.3.3.4 which permits compact, higher density development on lands that are adjacent to the approved limits of a PMTSA, subject to evaluation criteria being satisfied. Finally, we support the modified maximum height permissions granted to PMTSA lands, as outlined on Schedule 8. In our opinion, the above-noted policies and revisions to Schedule 8 are appropriate, will support the achievement of Provincial and local objectives and will enable compact, transit-supportive development to occur in appropriate locations that are served by transit networks.

Chapter 13, Growth Centres

As stated above, revisions are contemplated to the former structure of Growth Centre lands. More specifically, the draft Chapter 13 policy framework applies to specified lands throughout the Uptown, Fairview, Cooksville and Hospital communities of the City. The Downtown Core is now subject to area-specific policies outlined in Chapter 12 of the Mississauga Official Plan 2051. We support the transition as this will further support the delivery of compact, transit-supportive development in appropriate locations.

We are however, concerned with instances throughout Chapter 13 where urban design guidelines have been elevated to policy. This includes policies (such as Policy 13.3.3.1) relating to tower separation distances and the use of 45 degree angular planes to facilitate appropriate transition. In our opinion, these policy inclusions are unnecessarily restrictive and should be removed. Rather, the inclusion of urban design guidance within area-specific Built Form Guidelines has been successfully implemented without issue for decades. A removal of urban design guidance from policy will also serve to further implement the recommendations arising from the Mayor's Task Force.

Lastly, we are concerned with Policy 13.1.1.5 and Policy 13.1.2.5. Policy 13.1.1.5 states that developments within Growth Centres that would serve to significantly reduce the number of jobs that can be accommodated on the site will not be supported. In our opinion, this policy as drafted is unnecessarily restrictive, will serve to impede development in appropriate locations and does not adequately reflect pre-pandemic work from home patterns as well as post-pandemic or current market realities. The policy should be removed. Similarly, Policy 13.1.2.5 states that redevelopment of existing office buildings that results in the loss of office floor space will not be permitted, unless the same amount of office space is retained or replaced. As stated above, a policy that requires 1:1 replacement is unnecessarily restrictive, is contrary to current trends and best practices and should be removed.

Chapter 14, Growth Nodes

As highlighted above, revisions are contemplated to the former City Structure. More specifically, we understand that the former distinction between Major Node and Community Node areas of the City have been removed and instead, all applicable lands are now categorized as Growth Nodes, which are a component of the Strategic Growth Area classification. As stated throughout this Letter, we support the transition to the drafted policy framework which will continue to direct compact, transit-supportive development in appropriate locations across the City.

We are concerned with the policy framework related to the Central Erin Mills, Sheridan and South Common Growth Nodes in particular. More specifically, the housing-related policies provided for

these noted Growth Nodes do not conform to the revisions outlined in the Phase 1 Ontario Land Tribunal Order regarding Mississauga Official Plan Amendment 115 (MOPA 115). We request that the policies be revised to maintain consistency with the OLT Orders related to Phases 1 and 2 of the MOPA 115 appeal.

Glossary

The draft Official Plan contains a refined glossary of key terms in Chapter 19. Of particular concern is the refined definition of the term ***compatible***. Chapter 19 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.’

Conclusion

In summary, we acknowledge and appreciate revisions to the draft policy framework that have been made to enable flexibility. However, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. In our opinion, many of the proposed policies are overly and unnecessarily restrictive. Should the proposed policy framework, as contemplated, remain unchanged, we expect that an increased number of privately-initiated Official Plan Amendments would be triggered. An

increase in these applications will further constrain the limited municipal resources but will also continue to challenge the delivery of development in appropriate locations.

Thank you for the opportunity to provide these comments. GSAI 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. Mayor Parrish and Members of Council



Michael Gagnon
Lena Gagnon
Andrew Walker
Richard Domes

February 14, 2025

GWD File: 24.3493.00
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
Draft Mississauga Official Plan 2051 (January 2025)
2915, 2917, 2919 and 2921 Derry Road East
Part Lot 11 Concession 6 EHS Toronto Parts 1 to 5 43R13009
City of Mississauga, Ward 5

Dear Ben and Amina:

Gagnon Walker Domes Ltd. ("GWD") acts as Planning Consultant to 2849404 Ontario Inc., the Registered Owner of the properties known municipally as 2915, 2917, 2919 and 2921 Derry Road East, in the City of Mississauga; hereinafter referred to as the "subject site".

The subject site has an area of approximately 0.153 ha (0.379 ac) with a frontage of 20.80 (68.24 ft) on the north side of Derry Road East and 49.39 m (162.04 ft) on the west side of Airport Road. It is occupied by a two-storey commercial building comprised of four (4) separate units. The subject site is one of seven (7) separately owned properties, which form part of a larger commercial complex fronting onto Derry Road East, Airport Road and Hull Street.

Situated within the Malton Neighbourhood Character Area, the current in-force August 2024 City of Mississauga Official Plan designates the subject site 'Mixed Use'. Comprehensive Zoning By-law No. 0225-2007; as amended; zones the subject site 'General Commercial (C3)'.

Our Client is contemplating the redevelopment of the subject site for a 9-storey hotel (overnight accommodation); inclusive of ancillary banquet hall, restaurant and office uses. We are in the process of coordinating the preparation of preliminary concept plans

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illustrating how the subject site can be redeveloped for a 'boutique' hotel. We are targeting to file a Pre-Consultation Meeting Request in Q2-2025.



Figure 1 – Subject Site, Aerial Photography of 2915, 2917, 2919 and 2921 Derry Road East

Draft Mississauga Official Plan 2051

Our Client has asked us to review and provide comments, observations, and recommendations on the Draft Mississauga Official Plan 2051 (January 2025) (Draft MOP). The following is a summary of the designations/overlays that apply to the subject site within the Draft MOP:

Schedule 1 – City Structure

- 'Neighbourhood (NHD)'
- 'Protected Major Transit Station Area (PMTSA)'

Schedule 3 – Long Term Street Network

- Derry Road and Airport Road 'Region of Peel Arterial'

Schedule 4 – Long Term Transit Network

- Derry Road and Airport Road – 'Transit Priority Corridor'
- 'Major Transit Station Boundaries'

Schedule 5 – Long Term Cycling Routes

- Derry Road and Airport Road – 'Primary On-Road / Boulevard Routes'

Schedules 7D – Land Use Designations

- 'Mixed Use'
- 'Area Exception from LBPIA Operating Area'
- '1996 NEP/2000 NEF Composite Noise Contour – 35'

Schedule 8 – Protected Major Transit Station Areas

- 'KIT-1/ Malton GO'

Schedule 8p – Kitchener GO PMTSA

- Building Height Schedule '2 to 4 Storeys'
- Land Use Schedule – 'Mixed Use'

Based on our review of the policies within the Draft MOP, we respectfully request that the following comments, observations and recommendations be considered prior to the approval of the document.

1. CHAPTER 10 Land Use Designation **Section 10.2.6 Mixed Use**

While Policy 10.2.6.3 applies to lands designated Mixed Use, we are of the opinion that the specific wording included in sub-subsections a. i and ii should be revised to apply specifically and only to Mixed Use projects containing residential dwelling units as the predominant land use; and not to commercial projects containing hotel, banquet hall, restaurant and office uses as proposed by our Client. Please find below recommended revised policy language to this effect:

"10.2.6.3 Development on lands designated Mixed-Use will:

- a. **For projects containing predominately residential dwelling units** provide a minimum retail and service commercial space, equal to the greater of the two following requirements, unless otherwise specified by Character Area or Special Site policies:*
 - i. retail and service commercial Gross Floor Area (GFA) on the ground floor of each proposed building or the equivalent Gross Floor Area (GFA) across the site. Low-rise buildings intended for transition will not be included in the Gross Floor Area (GFA) calculation; or*
 - ii. sites under 5 ha will maintain 65% of the total existing retail and service commercial Gross Floor Area (GFA) and sites equal to or greater than 5 ha will maintain 45% of the total existing retail and service commercial Gross Floor Area (GFA). Low-rise buildings intended for transition will not be included in the Gross Floor Area (GFA) calculation;"*

2. CHAPTER 11 Transit Communities **Section 11.3.3 Heights**

While we support the premise behind Policy 11.3.3.2 as it allows for the consideration of additional height, subject to compliance with specific Criteria a. thru h., we are concerned that the determination of compliance is subjective. Our concern is associated with the lack of specificity in the Policy regarding how compliance is measured/determined. Case in point:

- Criteria a. – It is unclear how one determines if the City Structure Hierarchy is being “maintained”. Additional height requests should be assessed on a site-specific basis. Only then can it be determined if the proposed height is appropriate in the existing and planned context.
- Criteria b. – It is unclear how City Staff will determine whether an Amendment Application which seeks to change policies and/or schedules to increase building height will determine if the overall intent, goals, objectives, and policies of the Plan are being achieved.
- Criteria c. – It is recommended that the word “vision” be deleted from the criteria as the term is ambiguous and adds nothing to the intent of the Criteria.
- Criteria e. – It is recommended that the word “negative” be added following the word “minimize”; thereby qualifying the nature of the effect of the proposed additional height on visual impact, overall massing, shadow, wind, and overlook. Increased height in and of itself is not necessarily a problem, provided that there is no “negative” impact associated with it.
- Criteria f. and h. – It is unclear as to what is meant by “full funding”. Does “full funding” refer to funding advanced by a Proponent or does it refer to funding provided by a specific level(s) of government? Does partial funding render proposed additional building height unsupportable? How does the criteria propose to address circumstances where a Proponent elects to build a taller building containing the same gross floor area as a lower building? It is recommended that the criteria be revised to avoid subjective interpretation.

3. Schedule 8p – Kitchener GO PMTSA


While Schedule 8p prescribes ‘minimum’ and ‘maximum’ building heights of ‘2 to 4 Storeys’ for the Kitchener GO PMTSA, which includes the subject site, the maximum does not reflect what can be reasonably accommodated on our Client’s property in pursuit of a built-form which optimizes the site’s development potential for a ‘boutique’ hotel. The location of the subject site in immediate proximity to the Toronto Pearson International Airport, Malton GO Station, existing and future public transit, community facilities and amenities makes the property a prime candidate for the proposed ‘boutique’ hotel and ancillary banquet hall, restaurant and office uses.

With the aforementioned in mind, and based on the elevation of the subject site, we are given to understand by the GTAA that the maximum elevation of any proposed development on the property is 219.46 m ASL; coinciding with a 9-storey building. We also understand that any development application on the subject site will ultimately have to be reviewed by NAVCanada prior to approval being granted. We recommend that Schedule 8p be revised in accordance with the attached.

We would welcome an opportunity to discuss our comments, observations and recommendations with the Planning and Building Department prior to Council approval of the Draft MOP.

Kindly accept this letter as our formal request to be notified of all future Open Houses, Public Meetings, Planning Committee and Council meetings in connection with the Draft MOP. We request notification of the passage of any and all By-laws and/or Notices in connection with same.

Yours truly,



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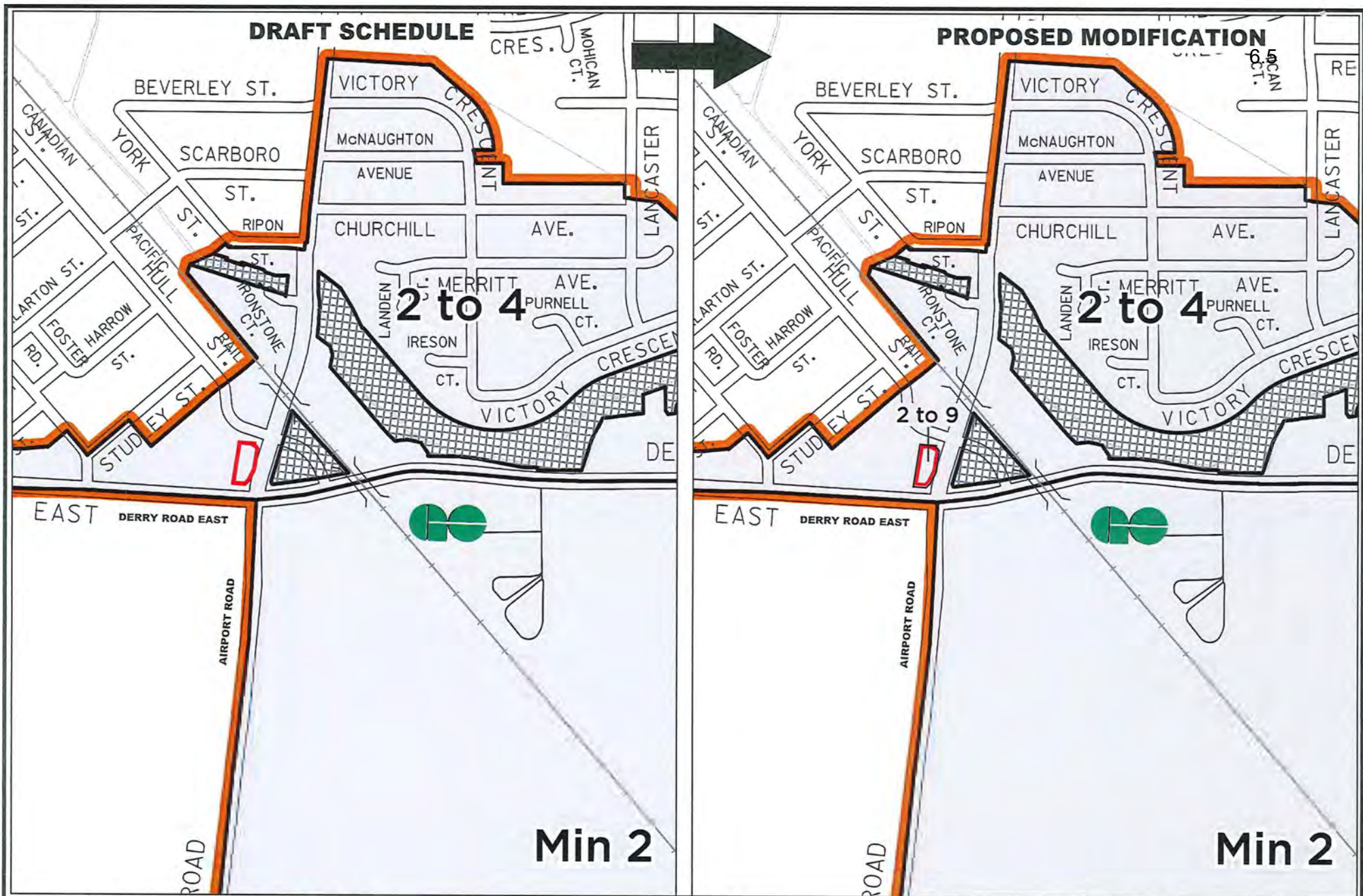


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C.c. P. Dhillon, 2849404 Ontario Inc.
G. Dhillon, 2849404 Ontario Inc.



PROPOSED MODIFICATION SCHEDULE 8P
BUILDING HEIGHT SCHEDULE
(KITCHENER GO - MALTON)
PROTECTED MAJOR TRANSIT STATION AREA (PMTSA)
DRAFT CITY of MISSISSAUGA OFFICIAL PLAN
2915, 2917, 2919 and 2921 DERRY ROAD EAST, CITY of MISSISSAUGA

| LEGEND | |
|--------|--|
| | SUBJECT SITE |
| | PROTECTED MAJOR TRANSIT STATION AREA (PMTSA) BOUNDARY (HEIGHT MAP) |
| | MIN # to MAX # (IN STOREYS) |
| | MALTON GO STATION |

| | |
|---|------------------------------------|
| P.N.: 24.3493 | Date: February 13, 2025 |
| Scale: N.T.S. | Revised: |
| Drawn By: D.S. | File No.: PN 3493_Figures_FEB_2025 |
| | |
| <small> 7685 Hurontario Street Suite 501 Brampton, Ontario L6W 0B4 P: (505) 756-5790 F: 1 (855) 771-7266 www.gwdplanners.com </small> | |

February 21, 2025

GSAI File: 792-013

Submitted electronically: official.plan@Mississauga.ca

Planning and Building Department
 City of Mississauga
 300 City Centre Drive
 Mississauga, ON L5B 3C1

Attention: Amina Menkad, Project Lead
 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 2025 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 (most recent in March 2024) to the City of Mississauga regarding their ongoing Official Plan review and reply to previous comments.

Our continuing concerns with the draft policies are described below in separate themes (Schedules, Growth Nodes Section 14, and Implementation).

Schedules

| Schedule | Identified Issue | Requested Action |
|--|---|---|
| # 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 has noted CVC to provide updated mapping. It is requested that CVC provide updated mapping as confirmed through the development application review and approval process. |
| # 6: Designated ROW | 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 | City to revise schedule. |

| | | |
|----------------------|---|--|
| | 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. | |
| # 7N: Land Use | <ol style="list-style-type: none"> 1. Block 8, M-2170 is shown as “Residential Low Rise II” which is inconsistent with other blocks which show “Residential High Rise”. Considering the current zoning/eMZO provisions that apply, this should be revised to reflect “Residential High Rise”. 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. | City to revise schedule. |
| # 8Q: PMTSA | <ol style="list-style-type: none"> 1. Block 8, M-2170 is shown as “Residential Low Rise II” which is inconsistent with other blocks which show “Residential High-Rise”. Considering the current zoning/eMZO provisions that apply, this should be revised to reflect “Residential High-Rise”. 2. There is a reference to “Min 3” or “Min 4” in various locations on the schedule. However, this appears to conflict with various active and/or approved development applications (residential and non-residential) which may be lower than the minimum prescribed heights. Further, specific to residential provisions, there are zoning/eMZO permissions for various forms of townhouses which may also be lower than the prescribed minimums. | City to revise schedule specific to land use designation and minimum heights. |
| Various schedules | <ol style="list-style-type: none"> 1. The City has approved new names for all the streets forming the road network on our client lands. In turn, the plan of subdivision which includes all these names has been registered (M-2170) on July 3, 2024. 2. The limit of the Growth Node should include water (land holdings of LCPL and part of subdivision) and other features. In the latest iteration, additional areas are now excluded from the Growth Node limits. This is not consistent with how a similar node is defined. The Port Credit Node (Schedule 7M) includes the entire limit of J.J. Plaus park and the breakwater proximate to the CLC lands in Port Credit. Portions of water forming part of the Port Credit node (i.e. the marina basin) are also included within the limits. In contrast, the existing pier limits in the Lakeview Growth Node is not included while intended to be available for future public use. The Lakeview Growth Node also includes the breakwater protecting the Lakefront Promenade park/marina facilities. None of the water “inlet” feature of the LCPL lands is included which should be similar to how the Port Credit Node is depicted. | City to revise all applicable schedules with approved names, boundary limits, water/breakwater features, etc.. |

Growth Nodes, Section 14 (14.2.4 Lakeview Waterfront)

Policy 14.2.8.4.2 references the Lakeview Design Guidelines but these are not included in the consolidated version of this last release of the Official Plan. If these will not be included, this policy should delete reference to the Design Guidelines.

While policy 14.2.8.4.3 references permitted building heights in various forms, the applicable land use designation does not necessarily permit all the forms of townhouses that are allowed from the previous private City-approved OPA nor the provisions of the eMZO for lands zoned “RA5”. A new policy under 14.2.4.10 (Land Use Designations) needs to reference an exception for “Residential High-Rise” to permit all the various forms of townhouses as noted.

The previous iteration of the Official Plan under various sections referred to Council-approved building heights obtained resulting from completion of the DMP/Height Study. If reference to a height study being applicable in this Node will remain in the Official Plan, then the previously approved building/heights should be referenced again. Any conflicts with heights as per the eMZO provisions are addressed with the proposed section noted below under “Implementation”.

Under the “Contamination and Land Use Compatibility” section, there is still no reference to the Council-approved Class 4 designation which applies to a section of the Node lands. It is important this be noted so there is no policy conflict as there are alternative ways to address compatibility under a Class 4 scenario. We would ask the City to add an appropriate policy to this effect which compliments the draft policies under 14.13.1.6 (Stationary Noise Sources).

Implementation

As the City is aware, the Lakeview Village lands are subject to an enhanced Minister’s Zoning Order 91/23 dated May 12, 2023, which is partially referenced in the latest draft iteration. However, there are many policy references which continue to conflict with the direction of the eMZO. A new implementation section (policy 14.2.4.10.14) should be added which speaks to policy conflicts with the provisions of the eMZO, as well as to matters regarding inclusionary zoning/community benefits, design guidelines, park/open space permissions, height study approvals, total units permitted, etc... If the issue raised above regarding minimum heights shown for Schedule 8q is not resolved through amending Schedule 8q, then this potential height conflict should also be noted in this new implementation policy.

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)

February 21, 2025

GSAI File: 1484-003

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
Petruso Point Service Corp.
3435 Eglinton Avenue West, City of Mississauga**

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Petruso Point Service Corp. (the "Owner") of the lands municipally known as 3435 Eglinton Avenue West, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letter, submitted by GSAI, dated March 15, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

As Staff and Council are aware, 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 in January 2025.

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns previously raised have been addressed through the removal of certain policies, four (4) primary concerns remain. Our remaining concerns are further described below.

1. City Structure

Chapter 3, Managing Growth presents a refined growth management framework for the City. More specifically, Chapter 3 outlines how growth and development is to be managed across the City up to the year 2051 in accordance with a refined City Structure. Chapter 3.3 and a revised Schedule 1 provide further direction and clarity on the current, proposed City Structure framework. We highlight that the Subject Lands continue to be identified as being located within the Churchill Meadows Neighbourhood Character 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 a refined, optimized, redevelopment form in an appropriate location. We remain of the opinion that greater flexibility is required in terms of maximum permitted heights in Neighbourhoods to enable contextually appropriate development to be introduced.

2 Built Form

Chapter 8 provides the City's refined built form and site development policy framework. We remain concerned with the transition to a built-form based policy framework. In particular, we are concerned with the proposed land use designation framework based on built form which restricts development opportunities rather than fostering them and the definition of a mid-rise building expressed in Chapter 8.6.1. As identified in Chapter 8.6.1.b), we understand that the following characterization of a mid-rise building is proposed:

- '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 be designed to consider the width of the street right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings are intended to 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.'*

While we acknowledge an improvement in the above-noted characterization of a mid-rise building from the previous draft policy, we remain concerned. Specifically, the characterization of a mid-rise building is problematic and does not adequately reflect best practice. The above mid-rise building characterization does not adequately capture the reality of contextually appropriate development forms that frame the street edge, support transit-supportive development forms and provide for appropriate transition through a variety of strategies. As further described below, we are concerned with the policy characterization of transition. 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. Given there is a wide diversity of locations for contextually appropriate built forms to be provided, restricting the height of a built form in the manner contemplated is unnecessarily restrictive, does not afford sufficient flexibility or variation and will challenge the delivery of high-quality, compact, transit-supportive development in the midst of a Provincial housing crisis. For the above-noted reasons, we continue to oppose the mid-rise building characterization. This characterization must be modified to recognize the existence and allow permission for these built forms at appropriate locations across the City.

3 Transition

Chapter 8 provides the refined built form and site development policy framework. We remain concerned that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c) and Policy 8.6.2.5. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is alarming. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

4. Retail Replacement

By way of context, the Subject Lands are currently designated 'Convenience Commercial' by the in-effect and by the draft Mississauga Official Plan. Based on the current and proposed policy framework, it is understood and acknowledged that development of the Site would likely require the Site to be redesignated to an applicable designation, such as Mixed Use. Given the current context of the Site as a local retail plaza, we are concerned with the evolving policy framework presented by Policy 10.2.6.3 for designated Mixed Use lands.

As drafted, Policy 10.2.6.3 requires replacement of existing retail and service commercial space when development is proposed. As drafted, the policy is unclear and requires modification. The policy which can be interpreted as requiring a degree of retail replacement space is also unnecessarily restrictive, will hinder development and does not adequately reflect the post-pandemic market. Requiring a development to provide the same or even a significant percentage of existing non-residential space to be replaced in a development does not adequately capture market trends, does not enable a property owner to 'right-size' the space to avoid significant void areas and does not reflect best practices. In

our opinion, this policy is premature given there is in-effect Provincial direction to encourage underutilized plazas to redevelop to support the provision of housing. It is also premature given the City is currently undertaking a Retail Market Study to better understand where retail may be needed and the type of retail that is needed to support community needs. Rather than requiring a minimum percentage of existing non-residential space to remain, we request a policy mechanism that would permit an appropriate amount of ground-level non-residential space based on the findings of a Market Impact Assessment, to the satisfaction of Staff. This policy mechanism would enable sufficient flexibility as development of underutilized retail plazas come forward and a way for development to proceed in a manner that supports Provincial and local objectives.

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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. Mayor Parrish and Members of Council
Petruso Point Service Corp.

February 21, 2025

GSAI File: 1484-004

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

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 (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated March 15, 2024 and June 12, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

As Staff and Council are aware, 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 in January 2025.

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns previously raised have been addressed through the removal of certain policies, three (3) primary concerns remain. Our remaining concerns are further described below.

1. City Structure

Chapter 3, Managing Growth presents a refined growth management framework for the City. More specifically, Chapter 3 outlines how growth and development is to be managed across the City up to the year 2051 in accordance with a refined City Structure. Chapter 3.3 and a revised Schedule 1 provide further direction and clarity on the current, proposed City Structure framework. We highlight that the Subject Lands continue to be identified as being located within the Central Erin Mills Neighbourhood Character Area. We remain concerned about the City Structure as drafted and repeat our request that the City Structure be amended to remove the Subject Lands from the Central Erin Mills Neighbourhood Character Area and instead add the Subject Lands to the newly defined Central Erin Mills Growth Node. We remain of the opinion that inclusion of the Subject Lands within the Central Erin Mills Growth Node is appropriate, would enable appropriate and compatible development to occur and would not comprise the overall City Structure.

Furthermore, we request clarification on why the former Uptown Major Node Character Area has been re-classified to be a component of the newly defined Growth Centre component of the City Structure when no other modifications to the decades old City Structure have been made. In our opinion, the continued exclusion of the Subject Lands from the Central Erin Mills Growth Node is inappropriate and is a missed opportunity to enable compact, transit-supportive, mixed-use development to occur in an appropriate location that will support in-effect Provincial, Regional and local policy objectives.

2. Built Form & Transition

Chapter 8 provides the refined built form and site development policy framework. We remain concerned with the transition to a built-form based policy framework and that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c), Policy 8.6.2.5 and Policy 8.6.2.6. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition. A similar concern is shared with Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, Policy 8.6.2.6 states that developments will provide a transition in building height and form between Strategic Growth Areas and adjacent Neighbourhoods with lower heights. Should the Subject Lands be added to the Central Erin Mills Growth Node, they would be considered a site within a Strategic Growth Area and adjacent to a Neighbourhood. Thus, Policy 8.6.2.6 is problematic. Policy 8.6.2.6 is followed by the following illustrative graphic, referred to as Figure 8.9:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning. As the policies as drafted suggest, there are various ways of ensuring appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is alarming. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will

restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

3. Retail Replacement

By way of context, the Subject Lands are currently designated Mixed Use by the in-effect and by the draft Mississauga Official Plan. While a site-specific Official Plan Amendment application has been submitted in December 2024 and if approved, would serve to re-designate the Site to 'Residential High Density' along with introducing modified development standards by way of a new Special Site policy, the draft Mixed Use policies as currently contemplated are concerning.

To be clear, we support the proposed policy direction provided by Policy 10.2.6.2 which permits designated Mixed Use to retain this designation when development includes residential uses. In our opinion, the policy as drafted is a significant improvement over the current in-effect policy framework which requires a site to be re-designated when the principal use is to be residential. We support the policy as currently drafted.

We are however concerned with the retail replacement requirements presented in Policy 10.2.6.3. As drafted, Policy 10.2.6.3 which requires replacement of existing retail and service commercial space is unclear. It is also unnecessarily restrictive, will hinder development and does not adequately reflect the post-pandemic market. Requiring a development to provide the same or even a significant percentage of existing non-residential space to be replaced in a development does not adequately capture market trends, does not enable a property owner to 'right-size' the space to avoid significant void areas and does not reflect best practices. In our opinion, this policy is premature given there is in-effect Provincial direction to encourage underutilized plazas to redevelop to support the provision of housing. It is also premature given the City is currently undertaking a Retail Market Study to better understand where retail may be needed and the type of retail that is needed to support community needs. Rather than requiring a minimum percentage of existing non-residential space to remain, we request a policy mechanism that would permit an appropriate amount of ground-level non-residential space based on the findings of a Market Impact Assessment, to the satisfaction of Staff. This policy mechanism would enable sufficient flexibility as development of underutilized retail plazas come forward and a way for development to proceed in a manner that supports Provincial and local objectives.

Chapter 17, Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 17 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area policies. While we support the transition to a refined policy framework that balances the Provincial and local objectives, we also request that a housekeeping Amendment be provided at the appropriate time in the future to recognize and implement the outcome of the current development approval and request for the Subject Lands to be subject to a Special Site policy.

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments.

Our Client 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. Mayor Parrish and Members of Council
Starmount Estates Inc.

February 21, 2025

GSAI File: 1484-005

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
Petruso Point Service Corp.
2980 Crosscurrent Drive, City of Mississauga**

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Petruso Point Service Corp. (the 'Owner') of the lands municipally known as 2980 Crosscurrent Drive, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letter, submitted by GSAI, dated March 15, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

As Staff and Council are aware, 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 in January 2025.

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we highlight that while certain concerns previously raised have been addressed through the removal of certain policies, four (4) primary concerns remain. Our remaining concerns are further described below.

1. City Structure

Chapter 3, Managing Growth presents a refined growth management framework for the City. More specifically, Chapter 3 outlines how growth and development is to be managed across the City up to the year 2051 in accordance with a refined City Structure. Chapter 3.3 and a revised Schedule 1 provide further direction and clarity on the current, proposed City Structure framework. We highlight that the Subject Lands continue to be identified as being located within the Meadowvale Neighbourhood Character 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 a refined, optimized, redevelopment form in an appropriate location. We remain of the opinion that greater flexibility is required in terms of maximum permitted heights in Neighbourhoods to enable contextually appropriate development to be introduced.

2 Built Form

Chapter 8 provides the City's refined built form and site development policy framework. We remain concerned with the transition to a built-form based policy framework. In particular, we are concerned with the proposed land use designation framework based on built form which restricts development opportunities rather than fostering them and the definition of a mid-rise building expressed in Chapter 8.6.1. As identified in Chapter 8.6.1.b), we understand that the following characterization of a mid-rise building is proposed:

- '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 be designed to consider the width of the street right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings are intended to 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.'*

While we acknowledge improvement in the above-noted characterization of a mid-rise building from the previous draft policy, we remain concerned. Specifically, the characterization of a mid-rise building is problematic and does not adequately reflect best practice. The above mid-rise building characterization does not adequately capture the reality of contextually appropriate development forms that frame the street edge, support transit-supportive development forms and provide for appropriate transition through a variety of strategies. As further described below, we are concerned with the policy characterization of transition. 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. Given there is a wide diversity of locations for contextually appropriate built forms to be provided, restricting the height of a built form in the manner contemplated is unnecessarily restrictive, does not afford sufficient flexibility or variation and will challenge the delivery of high-quality, compact, transit-supportive development in the midst of a Provincial housing crisis. For the above-noted reasons, we continue to oppose the mid-rise building characterization. This characterization must be modified to recognize the existence and allow permission for these built forms at appropriate locations across the City.

3 Transition

Chapter 8 provides the refined built form and site development policy framework. We remain concerned that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c) and Policy 8.6.2.5. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is alarming. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

4. Retail Replacement

By way of context, the Subject Lands are currently designated 'Convenience Commercial' by the in-effect and by the draft Mississauga Official Plan. Based on the current and proposed policy framework, it is understood and acknowledged that development of the Site would likely require the Site to be redesignated to an applicable designation, such as Mixed Use. Given the current context of the Site as a local retail plaza, we are concerned with the evolving policy framework presented by Policy 10.2.6.3 for designated Mixed Use lands.

As drafted, Policy 10.2.6.3 requires replacement of existing retail and service commercial space when development is proposed. As drafted, the policy is unclear and requires modification. The policy which can be interpreted as requiring a degree of retail replacement space is also unnecessarily restrictive, will hinder development and does not adequately reflect the post-pandemic market. Requiring a development to provide the same or even a significant percentage of existing non-residential space to be replaced in a development does not adequately capture market trends, does not enable a property owner to 'right-size' the space to avoid significant void areas and does not reflect best practices. In

our opinion, this policy is premature given there is in-effect Provincial direction to encourage underutilized plazas to redevelop to support the provision of housing. It is also premature given the City is currently undertaking a Retail Market Study to better understand where retail may be needed and the type of retail that is needed to support community needs. Rather than requiring a minimum percentage of existing non-residential space to remain, we request a policy mechanism that would permit an appropriate amount of ground-level non-residential space based on the findings of a Market Impact Assessment, to the satisfaction of Staff. This policy mechanism would enable sufficient flexibility as development of underutilized retail plazas come forward and a way for development to proceed in a manner that supports Provincial and local objectives.

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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. Mayor Parrish and Members of Council
Petruso Point Service Corp.

February 21, 2025

GSAI File: 940-001

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
Derry Britannia Developments Limited
0 – 6500 Ninth Line, City of Mississauga**

Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Derry Britannia Developments Limited (the "Owner") of the lands municipally known as 0 – 6500 Ninth Line, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letter, submitted by GSAI, dated March 15, 2024, we are pleased to submit this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative. We highlight that the Owner supports the City's review and update of the Mississauga Official Plan and welcomes the opportunity to further discuss with Staff.

Background Information:

As Staff and Council are aware, the Owner and GSAI have 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 in January 2025.

The Site, which is an assembly of parcels which are municipally known as 0 – 6500 Ninth Line, is located on the west side of Ninth Line, south of Derry Road. The Site is currently improved with a low-rise, temporary Sales Office. It is also being redeveloped with a compact residential development, including various built forms, that has been approved by City Council. Based on the in-effect planning policy framework, the Site is located within the Ninth Line Neighbourhood Character Area, within Precinct 3 of the Ninth Line Neighbourhood Character Area, is in proximity to transit services including the Highway 407 Transitway 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.

Concerns Related to the Draft Mississauga Official Plan 2051:

We have reviewed the draft Mississauga Official Plan 2051 (herein referred to as the 'draft Official Plan'), released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we

highlight that while certain concerns previously raised have been addressed through the removal of certain policies, four (4) concerns remain. These are described below.

1. Net Zero Developments

Chapter 4 of the draft Official Plan provides the City's refined natural environment policy framework. This policy framework includes climate change, sustainability and natural heritage policy guidance amongst other matters. Of relevance to the Subject Lands, we are concerned with Policy 4.2.2 and Policy 4.2.4 which collectively state that the planning and design of new communities and buildings are to aim to achieve near net zero emissions and that the City will promote renewable energy, energy conservation and efficient design. While we support these policy directions of encouraging appropriate development in light of a changing climate, we are concerned about the impact of these objectives as development approvals are implemented. More specifically, currently, the City's sustainability objectives are implemented and furthered by the Green Development Standards. However, the Green Development Standards establishes a minimum score that is to be achieved when development is being advanced and by extension minimum design features that must be incorporated. Given the Green Development Standards only apply to those development applications that are proceeding through the Site Plan Control or Site Plan Approval process after March 1, 2025, the above-noted policy will have indirect consequences of requiring significant investments into sustainable design features and technologies in the earliest development approval stages in order for a property owner to achieve a contextually-appropriate and economic solution for achieving near net zero emissions. It may also require additional supporting application materials to be prepared and as such, will pass additional costs on to the end user. In order to implement the Mayor's Task Force and Housing Pledge objectives of building more housing, we respectfully request that this policy be removed as it is contrary to the process and tiered, voluntary and involuntary requirements, contained in the City of Mississauga Green Development Standards.

2. Parkland

Chapter 4 of the draft Official Plan also provides policy direction regarding parkland provision. We highlight that Policy 4.3.5.5 states a minimum parkland provision standard that is contrary to Planning Act requirements. For context, Policy 4.3.5.5 states:

'4.3.5.5. The minimum park provision will be equivalent to:

- a. 12 percent of the total area of the Growth Centre and Growth Nodes; or*
- b. 1.2 hectares per 1,000 population in all other residential parts of the City.'*

In our opinion, the above-noted policy should be revised to reference the minimum parkland dedication requirements established by the Planning Act, rather than the above which is taken from the City of Mississauga's Parks Master Plan.

3. Land Use

Chapter 11, Land Use Designations provides the City's refined built-form based policy framework. We remain concerned with the transition to a built-form based policy framework. More specifically, the proposed transition from the Site being designated to 'Residential Mid-Rise' from the in-effect designation of 'Residential Medium Density' does not guarantee the same permissions going forward. We are particularly concerned with the Residential Mid-Rise policies as drafted that require a minimum building height of at least 5 storeys. While we acknowledge that some policy relief is awarded by the proposed Ninth Line Neighbourhood policies, and policies pertaining to Precinct 3 in particular, the

draft policy framework does not adequately reflect the approved development concept for the Site which is to include a range and mixture of residential built forms, including rear lane detached dwellings, street-oriented townhouses, rear lane townhouses and back-to-back townhouses. We are concerned that given the extensive community consultation that occurred during the processing of the preceding Draft Plan of Subdivision and Zoning By-law Amendment applications, there may be a misconception or misunderstanding that the 5-storey height permission will be universally applied across the Site when this is not the intention nor the approved development concept. Based on the above, we respectfully request that should the built form-based policy framework proceed, that the land use designation framework established in Chapter 11 and further modified in the case of the Subject Lands by the Ninth Line Neighbourhood Character Area policies, ensure that in-effect policy permissions are transferred appropriately. For clarity, we are prepared to support the re-designation of the Site so long as no development permissions are compromised. This would require an explicit policy reference in the Precinct 3 policies that notwithstanding the Residential Mid-Rise designation, ground related residential forms such as detached dwellings and all forms of townhouses are permitted.

4. Transition

Chapter 8 provides the refined built form and site development policy framework. We remain concerned that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c) and Policy 8.6.2.5. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:



Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning as we believe they are overly restrictive and unnecessary. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is concerning. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be

applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards, such as the Council adopted Shaping Ninth Line Guidelines that the Subject Lands have been reviewed and evaluated against. Elevating such urban design guidance to policy will restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design guidance in policy is contrary to the findings of the Mayor's Task Force which highlighted that urban design considerations can be an added hurdle or hindrance to expedited development approvals. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

Conclusion

In summary, we remain concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and continue to request that modifications be made. Thank you for the opportunity to provide these comments. Our Client 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 highlight that the Owner supports the City's review and update of the Mississauga Official Plan and welcomes the opportunity to further discuss with Staff.

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

February 24, 2025

GSAI File: 048-006

(Via Email)

Mr. Ben Philips

Project Manager, Mississauga Official Plan Review

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051
Star Seeker Inc., 619 Lakeshore Inc., 1022 Caven Inc., 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.

As Staff and Council are aware, 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 in January 2025.

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:

We have reviewed the draft Mississauga Official Plan 2051, released in January 2025 as well as the Official Plan Review Matrix prepared by City of Mississauga Staff. Based on this review, we have a number of concerns and offer the following comments.

1. City Structure

Chapter 3, Managing Growth presents a refined growth management framework for the City. More specifically, Chapter 3 outlines how growth and development is to be managed across the City up to the year 2051 in accordance with a refined City Structure. Chapter 3.3 and a revised Schedule 1 provide further direction and clarity on the current, proposed City Structure framework. We highlight that the Subject Lands are identified as being located within the Lakeview Neighbourhood Character Area. While we support the continued use of a policy framework, structured by the City Structure, the inclusion of the Subject Lands within the Neighbourhoods component may further challenge the delivery of a refined, optimized, redevelopment form in an appropriate location. We remain of the opinion that greater flexibility is required in terms of maximum permitted heights in Neighbourhoods to enable contextually appropriate development to be introduced.

2. Housing

Chapter 5, Housing Choices and Affordable Homes presents a refined housing-related policy framework. We are concerned with Policies 5.2.3, 5.2.4 and Table 5.1 as drafted.

Use of Region-wide housing targets, as established by Policy 5.2.4 and Table 5.1 is concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Additionally, Policy 5.2.4 and Table 5.1 which states that 30% of all new housing units, regardless of a property's location, are to be affordable housing units is contrary to in-effect legislation as well as Provincial and Regional policy objectives which collectively state that affordable housing units are legislated requirements only in Inclusionary Zoning Areas. We request that Table 5.1 be modified to reflect the City-wide scale and to establish in policy that affordable housing units cannot be mandated on properties outside of an Inclusionary Zoning Area.

Lastly, we are concerned with Policy 5.2.3 as drafted which encourages developments containing 50 or more units to provide 50% of units as family-sized or two and three bedroom units. While we understand the intent of the policy and appreciate use of the word 'encourage', the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. Additionally, encouragement of larger, family-sized units does not always reflect market trends or the reality that housing options for families will require a selection of housing units and price points. We request that Policy 5.2.3 be modified to encourage a reduced percentage (20% or less) of family-sized units or remove this policy to remove a barrier to the delivery of much needed housing units in appropriate locations across the City.

3. Built Form

Chapter 8 provides the City's refined built form and site development policy framework. We are concerned with the transition to a built-form based policy framework. In particular, we are concerned with the proposed land use designation framework based on built form which restricts development opportunities rather than fostering them and the definition of a mid-rise building expressed in Chapter 8.6.1. As identified in Chapter 8.6.1.b), we understand that the following characterization of a mid-rise building is proposed:

- '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 be designed to consider the width of the street right-of-way onto which they front, and they must ensure appropriate transition to the surrounding context. Mid-rise buildings are intended to 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.'*

While we acknowledge an improvement in the above-noted characterization of a mid-rise building from the previous draft policy, we remain concerned. Specifically, the characterization of a mid-rise building is problematic and does not adequately reflect best practice. The above mid-rise building characterization does not adequately capture the reality of contextually appropriate development forms that frame the street edge, support transit-supportive development forms and provide for appropriate transition through a variety of strategies. As further described below, we are concerned with the policy characterization of transition. 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. Given there is a wide diversity of locations for contextually appropriate built forms to be provided, restricting the height of a built form in the manner contemplated is unnecessarily restrictive, does not afford sufficient flexibility or variation and will challenge the delivery of high-quality, compact, transit-supportive development in the midst of a Provincial housing crisis. For the above-noted reasons, we oppose the mid-rise building characterization. This characterization must be modified to recognize the existence and allow permission for these built forms at appropriate locations across the City.

Additionally, in our opinion, restricting a mid-rise building to being generally 4 to 8 storeys in height (when the area-specific and land use designation policies are considered collectively) is unnecessary. As Staff are aware, mid-rise structures in neighbouring jurisdictions can and often do have differing heights. For example, the City of Brampton considers a mid-rise building to be up to 12 storeys, while the City of Toronto can consider a structure to be a mid-rise building with heights that are greater than 12 storeys. The policy limitation of a mid-rise building having a maximum height of 8 storeys is artificially low and will challenge the delivery of much needed, high-quality development in

appropriate locations by adding further policy barriers and requiring site specific amendments. In the case of the Subject Lands, the limitation of mid-rise built forms to be up to 8 storeys is inconsistent with the recent amendments to the Lakeview Local Area Plan which permits up to 14 storeys on deep sites, such as the Subject Lands. Furthermore, the requirement that a mid-rise building consider the width of the street Right-of-Way onto which it fronts remains restrictive and does not adequately account for site-specific contexts (for example, a higher-order road, Arterial, Collector, local road or laneway). This policy will serve to restrict development in appropriate locations. For the reasons outlined above, we request that the policy definition of a mid-rise building be modified to provide as much flexibility as possible.

4. *Transition*

Chapter 8 provides the refined built form and site development policy framework. We remain concerned that specific urban design guidance has been elevated to policy. More specifically, we are concerned with Policies 8.2.9.c) and Policy 8.6.2.5. Policy 8.2.9.c) states that the City's vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. Lastly, we highlight that following Policy 8.6.2.6, there is an illustrative graphic, labelled as Figure 8.9. Figure 8.9 is as follows:

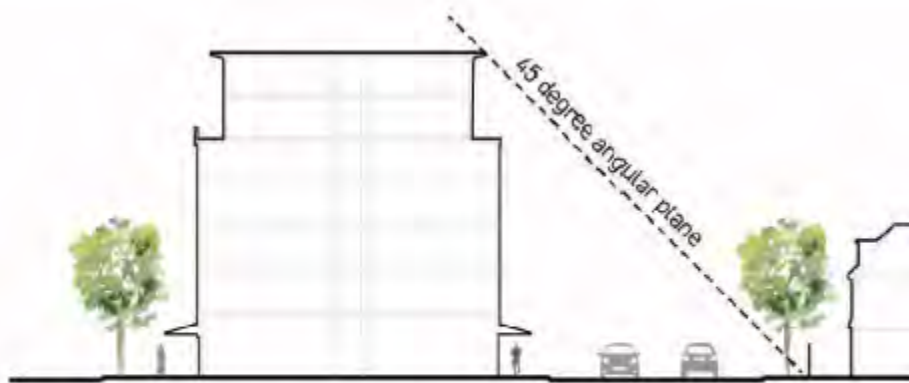


Figure 8.9. Angular planes allow for more gradual transitions between low-rise neighbourhoods to adjacent higher rise developments, while enhancing the pedestrian environment.

The above-noted policies and the above illustrative graphic are concerning. As the policies as drafted suggest, there are various ways and tools available to ensure appropriate transition can be provided. There is also ambiguity given transition is not defined. In our opinion, elevating appropriate transition and the ways that transition, including the use of angular plane provisions, can be achieved from urban design guidance to policy is alarming. This concern is furthered by the above-noted policies which suggest that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied. Any policy requiring that an angular plane be applied as a means to control transition is overly restrictive, misleading and contrary to good practice. In our opinion, any angular plane requirement should be removed from the above-noted policies. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards. Elevating such urban design guidance to policy will restrict development and efficient, high-quality built forms where development ought to be directed in the midst of a Provincial housing crisis. Furthermore, the inclusion of angular planes and other urban design

guidance in policy is contrary to the findings of the Mayor's Task Force. Additionally, the illustrative graphic provided by Figure 8.9 should be removed to eliminate confusion or policy misinterpretation.

5. *Open Space & Amenity Area*

Section 8.4.5 provides a policy framework regarding open space and amenity areas. While we support the policy direction to recognize that open spaces of varying forms can complement and support public spaces such as public parks, we remain concerned with Policy 8.4.5.2 which states:

- '8.4.5.2. Privately Owned Public Spaces (POPS) contribute to the public realm. These spaces, where appropriate, will be designed and maintained in accordance with the standards established by the City, and remain open and universally accessible to public. POPS provided to the City will:*
- a) provide a public easement over the extent of the POPS; and*
 - b) the size, extent, design, configuration and program of POPS will be done in consultation and to the satisfaction of the City.'*

The above-noted policy as drafted is concerning and requires revision. To begin, a policy requirement that a Privately Owned, Publicly Accessible Space (POPS) be designed in accordance with a City Standard is unnecessarily restrictive and does not afford sufficient flexibility to achieve contextually/locationally appropriate open space design. The location, design and ultimate programming of a POPS space within a development can vary depending on site-specific contexts and circumstances. Requiring that a POPS space be designed in accordance with a City Standard does not adequately reflect the above-noted variations and take into consideration any necessary flexibility in designing open spaces. Requiring that a POPS space be designed in accordance with a City Standard does not adequately reflect the above-noted variation and flexibility. Furthermore, there is no current City Standard for POPS. Therefore, a policy requirement that a POPS be designed to conform to a City Standard that does not yet exist is premature. We request that this policy be modified to remove reference to a City Standard.

6. *Retail Replacement*

By way of context, the Subject Lands are currently designated 'Mixed Use' and 'Medium Density Residential' by the in-effect and are identified as to be designated 'Mixed Use' and 'Residential Low-Rise II' by the draft Mississauga Official Plan. Based on the current and proposed policy framework, it is understood and acknowledged that development of the Site would likely require the Site to be redesignated to an applicable designation, such as Mixed Use. Given the current context of the Site as a local retail plaza, we are concerned with the evolving policy framework presented by Policy 10.2.6.3 for designated Mixed Use lands.

As drafted, Policy 10.2.6.3 requires replacement of existing retail and service commercial space when development is proposed. However, as drafted, the policy is unclear and requires modification. The policy which can be interpreted as requiring a degree of retail replacement space is also unnecessarily restrictive, will hinder development and does not adequately reflect the post-pandemic market. Requiring a development to provide the same or even a significant percentage of existing non-residential space to be replaced in a development does not adequately capture market trends, does not enable a property owner to 'right-size' the space to avoid significant void areas and does not reflect best practices. In our opinion, this policy is premature given there is in-effect Provincial direction to encourage

underutilized plazas to redevelop to support the provision of housing. It is also premature given the City is currently undertaking a Retail Market Study to better understand where retail may be needed and the type of retail that is needed to support community needs. Rather than requiring a minimum percentage of existing non-residential space to remain, we request a policy mechanism that would permit an appropriate amount of ground-level non-residential space based on the findings of a Market Impact Assessment, to the satisfaction of Staff. This policy mechanism would enable sufficient flexibility as development of underutilized retail plazas come forward and a way for development to proceed in a manner that supports Provincial and local objectives.

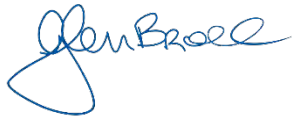
Conclusion

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 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. Mayor Parrish and Members of Council
Owner

City of Mississauga
Mississauga City Hall
300 City Centre Drive
Mississauga, ON, L5B 3C1

February 26, 2025
File 12183

Attn: Amina Menkad, Project Lead

**RE: Comments on the Draft Mississauga Official Plan (January 2025)
2090 & 2100 Hurontario Street
City of Mississauga**

Weston Consulting is the authorized planning agent for Hurontario Office Centre Inc., the owner of the lands municipally known as 2090 and 2100 Hurontario Street in the City of Mississauga (the “subject lands”). We are actively monitoring and participating in the current City of Mississauga Official Plan Review process on behalf of the owner. The purpose of this letter is to provide formal comments on the Draft City of Mississauga Official Plan (January 2025) and the draft materials that have been released for review and comment. We request that this letter be considered in the finalization of the Official Plan.

Description of the Subject Lands

The subject lands are located on the northwest corner of Hurontario Street and Harbourn Road and are currently occupied by two commercial plazas (Figure 1). They have an approximate combined area of 0.43 hectares (1.07 acres) with an approximate combined frontage of 87.7 metres along Hurontario Street and 45.6 metres along Harbourn Road. The site is subject to a storm sewer easement along the northeast corner of the site.



Figure 1: Aerial Photo of Subject Lands

The current City of Mississauga Official Plan (August 2024 Consolidation) designates the subject lands as *Convenience Commercial* according to Schedule 10 – Land Use Designations, while the site is further located within the Downtown Hospital Character Area and has a maximum floor space index of 0.9 FSI. The site is located within the Protected Major Transit Station Area 3 (PMTSA HLRT-3) – Hurontario LRT and is located approximately 100 metres from the North Service Station along the Hurontario LRT route, which is located directly in front of the property.

City of Mississauga Official Plan Review

We have reviewed the Draft Mississauga Official Plan released on January 21, 2025, and are pleased to provide the following comments and recommendations.

Land Use and Height

Draft Schedule 7J – Land Use Designations, designates the subject lands as *Convenience Commercial* within a *Growth Centre* (Figure 2). Lands designated *Convenience Commercial* permit uses such as restaurants, retail stores, financial institutions, and more. Further, Draft Schedule 8I – Protected Major Transit Station Areas (PMTSA) proposes a maximum height permission of 4-storeys for the subject lands (Figure 3).

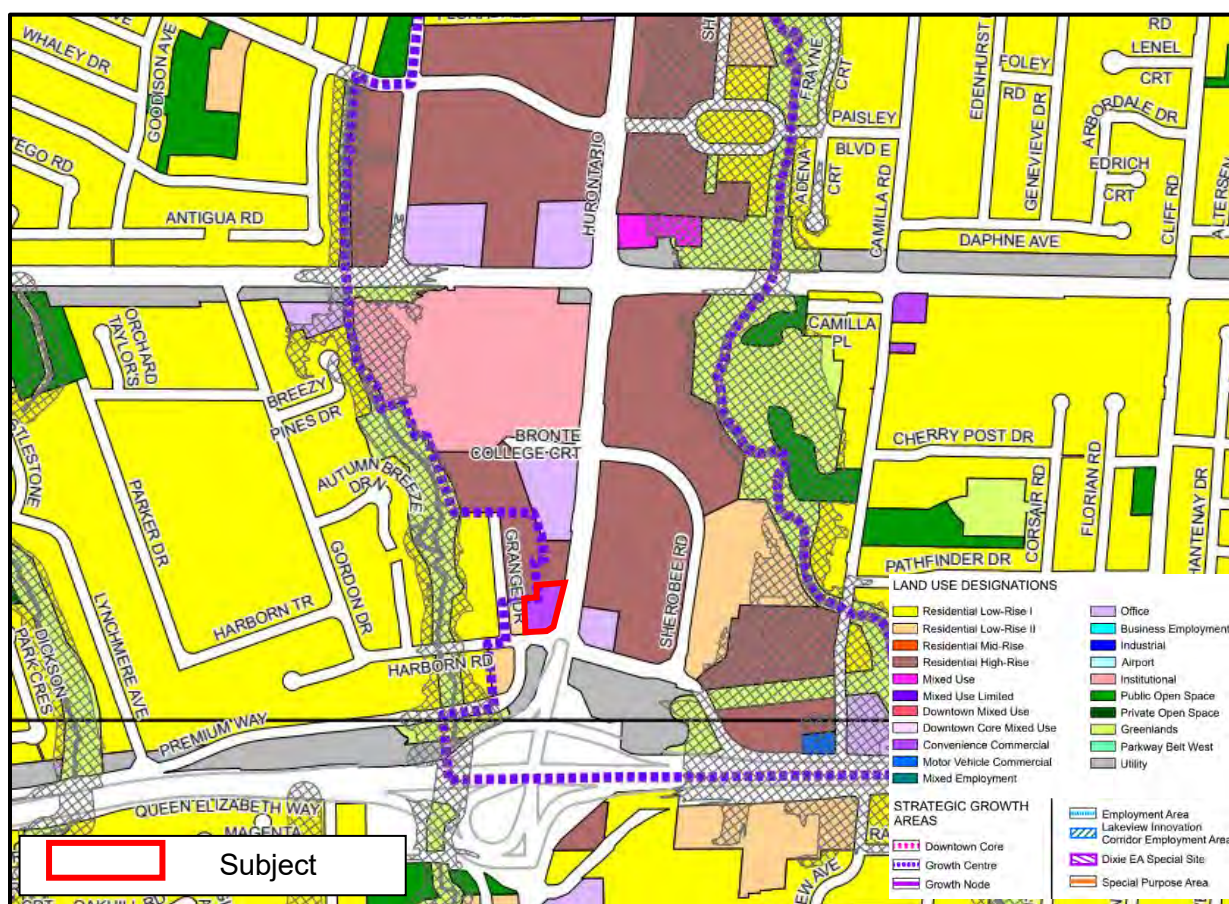


Figure 2: Draft Schedule 7J – Land Use Designations

Policy 13.1.1.3 b) of the Draft Official Plan establishes that Growth Centres will be planned to “accommodate significant population and employment growth and support opportunities for residents to work in Mississauga.” In our opinion, the *Convenience Commercial* designation for the subject lands is inappropriate due to its location

along Hurontario Street, within a PMTSA, and *Growth Centre*. Although this designation accommodates the current use and function of the subject lands, it does not appropriately plan for its future redevelopment in the context of its location and overarching policy changes. Policy 11.2.6 maintains that development in MTSA's will *"leverage infrastructure investments by planning for transit-supportive densities and increased transit ridership."* We support directing height and density to Growth Centres and MTSA's to meet and exceed the minimum population and density targets of the Draft Official Plan; however, the maximum height permission on Schedule 8I is too prescriptive, limits development potential, and does not recognize site-specific and detailed design considerations for individual lands. In our opinion, the subject lands are appropriate for more height and density and should be redesignated to *Residential High-Rise* to support the PMTSA density targets. Further, redesignating these lands *Residential High-Rise* will reflect the land use designation to the north and west and provide a unified and comprehensive development pattern within the North Service area of the PMTSA.

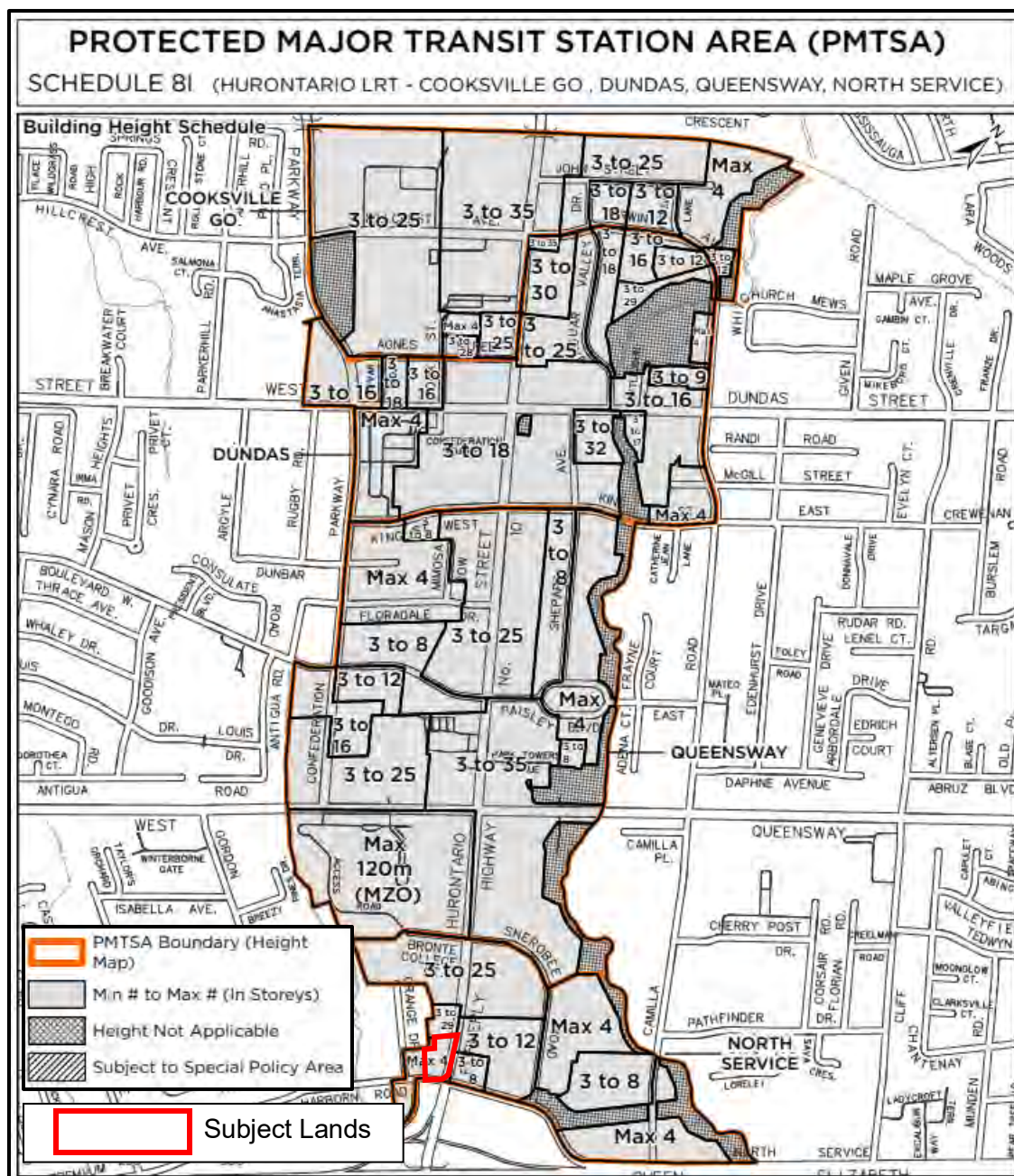


Figure 3: Draft Schedule 8I – Protected Major Transit Station Area (PMTSA)

Table 11-1 of the Draft Official Plan establishes a minimum density target of 300 people and jobs per hectare for the North Service PMTSA. Schedule 8I establishes that the maximum height of buildings on the subject lands shall be 4 storeys. In our opinion, limiting the maximum height permission to 4-storeys for the subject lands does not support the Draft Official Plan objectives to achieve a density of 300 people and jobs per hectare within the PMTSA and will limit the ability to meet these goals. In our opinion, keeping the subject lands designated the same as the current official plan permissions is a missed opportunity to maximize the use of future transit investments and the new PMTSA policy framework.

Policy 11.3.3.2 indicates that heights within the PMTSA in excess of the limits identified in the Plan and Schedule 8I – Protected Major Transit Station Areas may be permitted through a site-specific Official Plan Amendment Application subject to certain site-specific criteria being met. While we support the recognition to achieve greater heights, we are of the opinion that this can be achieved without an amendment to the Official Plan and through a more appropriate designation for the subject lands at its base permissions. Adherence to the criteria and appropriateness of the height and density will ultimately be determined through a site-specific Zoning By-law Amendment. The purpose of the official plan is to provide the visioning and future planned context for the City and should provide land use designations that encourage future development rather than maintain outdated existing permissions and a land use context that deviates from the hierarchy of applicable policies and ultimate planned vision for the Hurontario corridor.

Further, the opportunity for greater heights and densities for the site has been previously explored in relation to the adjacent site to the west and the previously approved development permissions for the immediately abutting lot to the north which permits a maximum building height of 29 storeys. Through this process it was established that the subject lands could accommodate a future tower redevelopment subject to appropriate setbacks and tower separations. This is supported by the confirmation letter from City of Mississauga Planning Staff dated January 8, 2019 and the accompanying concept plan prepared by Turner Fleischer dated March 9, 2018.

Conclusion

In general, we support the overall direction and intent of the Mississauga Official Plan update process and maintain that the subject lands are appropriate for intensification; however, in our opinion, they will benefit from increased height and density permissions to achieve the land use planning vision for the Hurontario corridor and contribute to the minimum density targets needed to support the MTSA policy provisions. In our further opinion, providing greater flexibility to meet the population and density targets of the North Service PMTSA is a positive and efficient way to review and establish the development permissions for the site outside of an Official Plan Amendment process, while providing a sufficient review process through a Zoning By-law Amendment process.

We request that greater height and density permissions for the subject lands be given due to the previous approvals and land use planning context for the adjacent lands and that a tower redevelopment can be supported based on the size and configuration of the subject lands. As noted, maintaining the existing land use permissions for the subject lands is in our opinion a missed opportunity to provide for a forward looking and development framework that will allow for heights and densities that support the PMTSA designation, and the LRT transit investments being made for the Hurontario corridor. As it has been confirmed that the site can support a tower/high-rise format, the subject land can contribute new housing opportunities to the broader community.

Weston Consulting will continue to monitor the Mississauga Official Plan Review process and reserves the right to provide further comments on the policies and/or schedules as it relates to the future development of the subject lands. We respectfully request to be notified of any future reports, public meetings and decisions in relation to this matter, and any proposed modifications to the Draft Mississauga Official Plan.

Thank you for the opportunity to provide these comments. Please contact the undersigned at extension 252 or Rupneet Mangat at extension 277 should you have any questions regarding this submission.

Yours truly,

Weston Consulting

Per:



Michael A. Vani, BURPL, MCIP, RPP
Senior Associate

c. Hurontario Office Centre Inc.

Attachments:

1. City of Mississauga Future Redevelopment Letter, dated January 8, 2019
2. Concept Plan prepared by Turner Fleischer, dated March 9, 2018

January 8, 2019

Mr. Denis Gubert
Hurontario Office Centre Inc.
1858 Avenue Road, Suite 200
Toronto, Ontario, M5M 3Z5

Dear Mr. Gubert,

**Subject: Hurontario Office Centre Inc. ("HOCI")
2090-2100 Hurontario Street (the "Subject Property")**

This letter will advise HOCI of staff's position on potential future re-development of the Subject Property. This position is based on currently-applicable Official Plan policy, and takes into account design guidelines for other parts of the City, recognizing that there currently are no guidelines directly applicable to this area.

In our view, and subject to the following, the Subject Property can accommodate future re-development for mixed uses.

The tower portion of any future building would need to be set back a minimum of 22.5 metres from the northerly boundary of the Subject Property. This would ensure a total separation of 30 metres between any future tower on the Subject Property and the proposed south tower on the property to the immediate north. Should the design appropriately mitigate potential impacts of the separation between towers such as using an off-set (not directly face to face) and slender floor plate, a slightly reduced setback may be considered.

The proposal for the subject lands will also need to address shadow impacts and demonstrate an appropriate transition to the Gordon Wood neighbourhood to the west through massing, height, setbacks, landscaping and buffers.

As you know, this letter cannot legally bind present or future City Councils. However, it presents the position of City Staff at the time of writing. We trust this is satisfactory.

Sincerely,



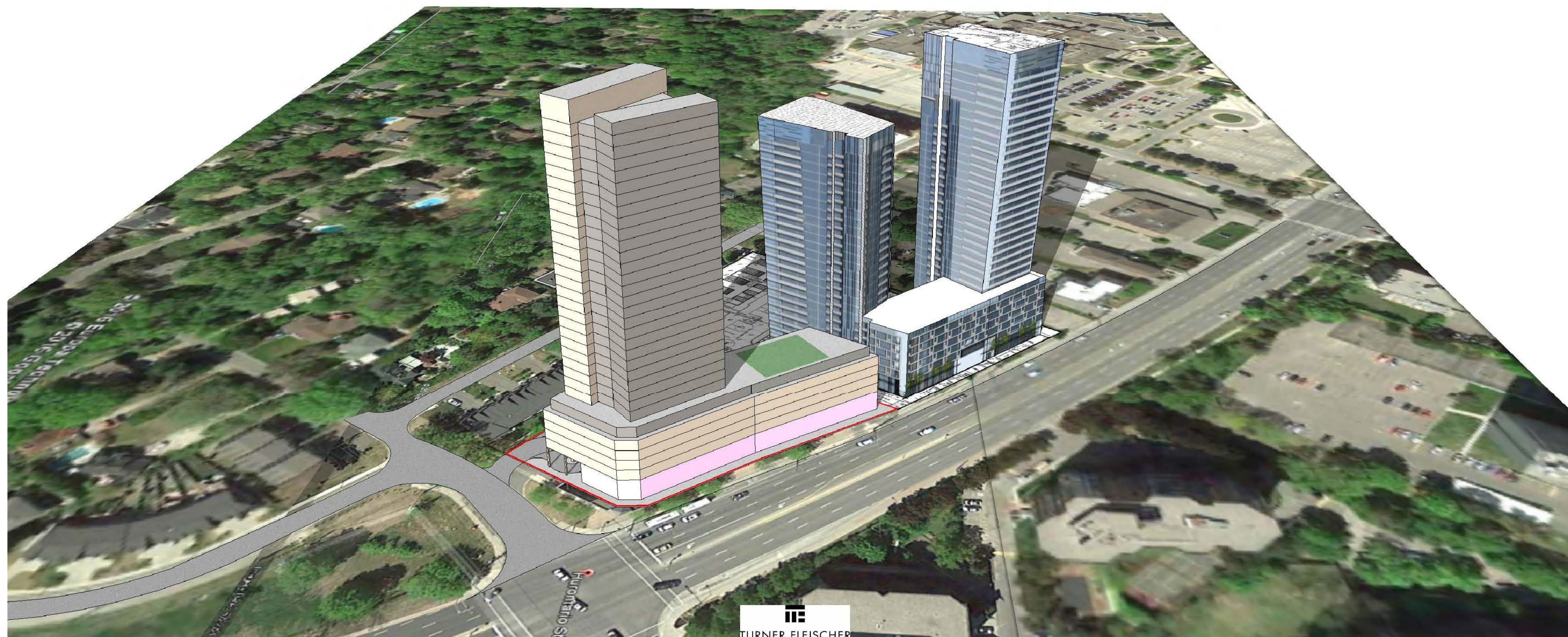
Marianne Cassin MCIP, RPP

Manager, Development Central
T 905-615-3200 ext.5534

marianne.cassin@mississauga.ca

City of Mississauga | Planning and Building Department,
Development and Design Division

cc: Mr. Patrick Devine



AIR VIEW TO SOUTHWEST

2120 HURONTARIO ST
MISSISSAUGA, ONTARIO


TURNER FLEISCHER

FEBURARY 21 2018

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2120 HURONTARIO
ROAD,

MISSISSAUGA,
ONTARIO



SCALE = 1 :

MAR 09, 2018
16.069



STATISTICS

APPROXIMATE SITE AREA:

TOTAL NEW GFA

RESIDENTIAL

TOTAL F.S.I.

AVERAGE CONDO APARTMENT SIZE

INDOOR MAENITY

OUTDOOR AMENITY

M2

4,405

35,690

33,741

8.10

70

900

900

SF

47,415

384,165

363,188

750

9,684

9,684

GFA CALCULATION (EXCLUDES U/G PARKING AREA, ELEVATOR SHAFTS, GARBAGE CHUTE,GARBAGE ROOM, EXIT STAIR SHAFTS PER MISSISSAUGA BY-LAW)

| BLOCKS | RETAIL | | SERVICE | | RESIDENTIAL | | | TOTAL | |
|-------------------------------|--------|--------|---------|-------|------------------|---------|-------------|--------|---------|
| | m2 | ft2 | m2 | ft2 | m2 | ft2 | UNIT#(4)(5) | m2 | ft2 |
| GROUND FLOOR | 1,844 | 19,849 | 105 | 1,128 | 250 | 2,691 | 0 | 2,199 | 23,668 |
| FLOOR 2 | | | | | 2,232 | 24,025 | 28 | 2,232 | 24,025 |
| FLOOR 3 | | | | | 2,232 | 24,025 | 28 | 2,232 | 24,025 |
| FLOOR 4 | | | | | 2,232 | 24,025 | 28 | 2,232 | 24,025 |
| FLOOR 5 | | | | | 2,232 | 24,025 | 28 | 2,232 | 24,025 |
| FLOOR 6 | | | | | 2,232 | 24,025 | 28 | 2,232 | 24,025 |
| FLOOR 7 (INDOOR AMENITY 900) | | | | | 1,031 | 11,098 | 11 | 1,031 | 11,098 |
| FLOOR 8 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 9 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 10 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 11 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 12 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 13 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 14 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 15 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 16 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 17 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 18 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 19 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 20 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 21 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 22 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 23 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 24 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 25 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 26 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 27 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 28 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 29 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 30 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 31 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| FLOOR 32 | | | | | 852 | 9,171 | 12 | 852 | 9,171 |
| TOTAL | 1,844 | 19,849 | | | 33,741 | 363,188 | 450 | 35,690 | 384,165 |
| | | | | | COMMERCIAL TOTAL | | | 1,844 | 19,849 |

UNIT MIX

| | | |
|-----|-----|----|
| 1B | 28 | 3B |
| 70% | 25% | 5% |
| 315 | 112 | 22 |

| PARKING REQUESTED (1)(2)(3) | | |
|--|--------------|-------|
| | RATIO | SPACE |
| RESIDENTIAL (CONDO APARTMENT) | (2) | 450 |
| COMMERCIAL | 4/100 M2 | 74 |
| VISITOR(CONDO APARTMENT) | 0.15/UNIT(2) | 67 |
| TOTAL | | 591 |
| PARKING # PROVIDED BY ADJACENT PARKING LOT TO THE WEST | | |
| SURFACE | | 7 |
| U//G1 | | 123 |
| U/G2 | | 123 |
| U/G3 | | 123 |
| U/G3 | | 123 |
| U/G5 | | 92 |
| | | 591 |

NOTE: PER MISSISSAUGA BY-LAW

1)ASSUMING RETAIL PARKING RATE REQUEST =4/100M2

2)ASSUMING RESIDENTIAL PARKING RATE=1/UNIT

3)ASSUMING VISITOR PARKING RATIO=0.15/ UNIT

4) ASSUMING NET AVERAGE RESIDENTIA L APARTMENT UNIT SIZE =750 SF

5) ASSUMING FLOOR PLATE EFFICIENCY= 0.87

F.S.I. LOST CALCULATION

| | M2 | SF |
|------------------------------|--------------|---------|
| APPROXIMATE TOTAL SITE AREA: | 4,405 | 47,415 |
| METROLINX PART 1 AREA | 199.6 | 2,148 |
| TOTAL NEW GFA | 35,690 | 384,165 |
| F.S.I. | 35690/ 4405= | 8.10 |
| GFA LOST BY METROLINX PART 1 | 8.1*199.6= | 1,617 |
| | | 17,407 |

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2120 HURONTARIO ROAD,

MISSISSAUGA, ONTARIO



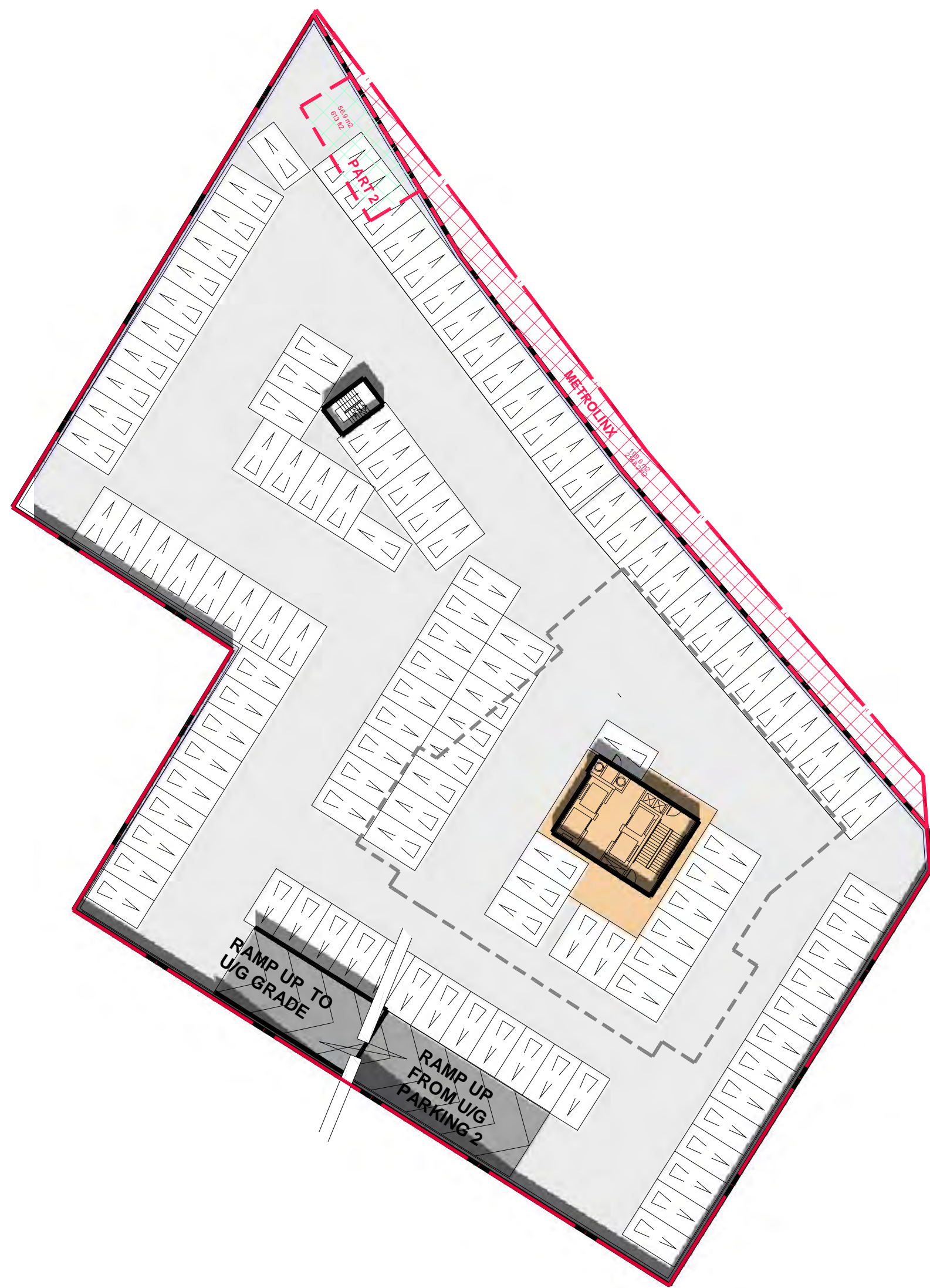
STATISTICS

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MAR 09, 2018

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2120 HURONTARIO
ROAD,

MISSISSAUGA,
ONTARIO



U/G 1

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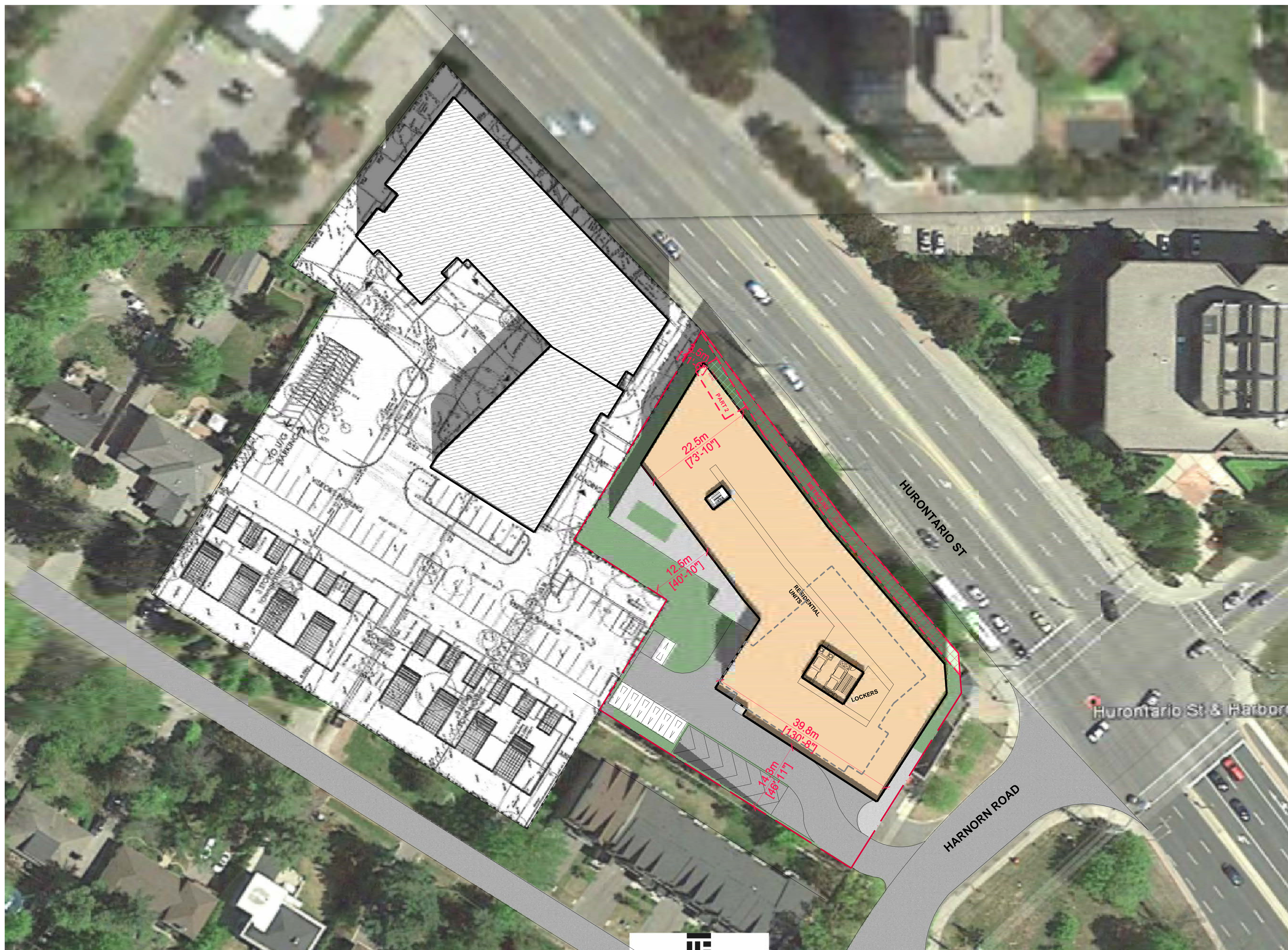
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2120 HURONTARIO
ROAD,

MISSISSAUGA,
ONTARIO



F2~F6

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MAR 09, 2018
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MISSISSAUGA,
ONTARIO



**TYPICAL
FLOOR PLAN**
SCALE = 1 : 400

MAR 09, 2018
16.069

A-4



AIR VIEW TO NORTH

**2120 HURONTARIO
ROAD,**

MISSISSAUGA,
ONTARIO



3D IMAGE

SCALE = 1 :

MAR 09, 2018
16.069



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www.turnerfleischer.com

February 26, 2024

Our File: 1533-001

Planning & Building Department
City of Mississauga
300 City Centre Drive
ON, L5B 3C1

Attn: Ben Phillips, Project Manager
Amina Menkad, Project Lead

**Re: City of Mississauga Official Plan Review
Community Information Centre – Response to Draft Policies
2157 Royal Windsor Developments Inc. (c/o Antonio Behno)
2157 Royal Windsor Drive, City of Mississauga**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission in response to the draft Official Plan policies released as of January 2025. We provide these comments to staff at the City of Mississauga on behalf of our client, 2157 Royal Windsor Developments Inc. (c/o Antonio Behno), owner of the lands municipally addressed as 2157 Royal Windsor Drive ('the lands'). The lands are located within the 500m radius of the Clarkson GO MTSA – situated slightly southwest of the GO/Metrolinx lands, with frontage onto Royal Windsor Drive. We have appended an Aerial Image of the site's location, for reference.

We are making this submission to request that Official Plan review staff consider our Client's site for **redesignation to permit residential uses** (ultimately, to facilitate a mixed-use development) and remove the existing "Employment Lands" designation. We make this request as we are of the opinion that a redesignation to permit residential uses and other non-residential (commercial, retail, service uses, amongst others) presents a logical, progressive and opportunistic approach to land use planning for strategic growth areas by making lands available for redevelopment without major policy barriers. Conversely, maintaining these lands for Employment Lands presents an overly restrictive response to an area in transition (Clarkson GO Major Transit Station and surrounding area(s)) and frustrates the planned function of a Primary Major Transit Station Areas as area where development and intensification ought to occur. This area has also been subject to lengthy study outside of the City's Official Plan Review process, as part of the Clarkson MTSA Master Plan work, which confirmed opportunities for residential land uses on certain PMTSA lands.

For the benefit of staff, we confirm that we have attended the Development Application Review Committee ('DARC') to begin the formal process for an Official Plan Amendment and Zoning By-law Amendment to facilitate redevelopment of the subject site. While we intend to continue to pursue the requisite Planning processes to achieve our Client's objective for site redevelopment, we see the City's Official Plan Review process as an opportunity to seek the City's support for resignation of the lands to lift existing land use policy constraints currently in place that otherwise frustrate the development potential for lands suitable for redevelopment within a Primary Major Transit Station Area.

GSAI has made several submissions on behalf of our Client through the Clarkson GO MTSA Master Plan public consultation periods. Through that process, and in addition to the formal written submissions making the request for redesignation of the Subject Site, GSAI made a deputation to the Planning & Development Committee on December 9, 2024, which included the request that the Committee provide direction to staff to remove the property from the Employment Lands designation and redesignate the Subject Property to “Mixed Use” (or another appropriate land use designation which would permit for residential uses as well as non-residential uses) through the Clarkson GO MTSA Master Plan work in order to facilitate redevelopment of the property, generally consistent with the land uses presented through the aforementioned DARC application. Historically staff have cited land use compatibility as the major factor for not considering the redesignation of our Client’s lands. In response to this, the Owner (with the support of WSP Consulting Engineers) has provided site specific evidence to support request for redesignation of the lands to accommodate sensitive residential uses. Those Reports concluded that while land use compatibility may need to be a consideration to a site specific planning application, it is not a prohibitive matter when contemplating introducing more sensitive uses the Subject Site.

Notwithstanding these submissions, staff have not accommodated our redesignation request (through the Clarkson MTSA Study) despite several detailed planning and technical submissions.

Following the December 9, 2024, Planning and Development Committee meeting, GSAI had the opportunity to meet with staff to discuss our request in further detail. It is our understanding that resultant of that meeting, staff are further reviewing the WSP technical analysis and plan to meet with us again in late February 2025. We maintain our opinion that from a Planning perspective, the introduction of additional land use permissions to include residential uses is in keeping with the objectives and policies at the Regional, Local and provincial level for strategic growth areas such as Major Transit Station Areas.

We note the City’s vision or new emphasis on creating mixed use communities, increasing the housing supply and optimizing existing and planned transit infrastructure as outlined in the PPS 2024. We agree with this vision and feel there are policy parameters that staff should consider specifically for sites within areas in transition, such as this site (we refer staff to the policies found under the “Mixed Use Limited” designation found in the Dixie Dundas policy area – with the understanding those policies are presently under appeal). We feel the subject lands are ideally suited to fulfill the City’s vision and can meet the Provincial Planning Statement 2024(‘PPS 2024’) policies as a site in transition able to accommodate the next generation of housing and other land use growth for the City. We also remind the City about the option to implement a Council approved Class 4 Designation tool, which was purposefully and intentionally brought forward by the Province to put into place a designation for emerging, transitioning and developing areas to deal with noise. The concept of the 15-minute City and capitalizing on work/live/play opportunities continues to evolve in urban settings with little to no undeveloped space, such as in the City of Mississauga, where it is entirely conceivable that the assignment of Class 4 areas with respect to noise may become increasingly more prevalent and appropriate.

Beyond the general Land Use redesignation request, we are also providing comments on the following draft policies presently outlined in the MOP:

4.2.2 *Mississauga will support the planning and design of new communities and buildings that aim to achieve near net zero emissions.*

We appreciate the intent of the policies surrounding climate change, however policy 4.2.2 is concerning in terms of the reference to “near net zero emissions”. We question how staff will enforce this policy and

have concerns surrounding the possibility of significant timing and delays through the development approvals process, where staff and a proponent may not agree on the building design/materials and achievement of the near net zero emissions. It is also not clear whether this policy is a complement to the upcoming City Green Development Standard or meant to be a requirement in addition to the new City GDS.

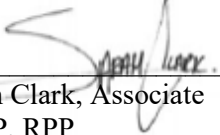
*5.2.3 To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include **50 percent** of a mix of 2-bedroom units and 3-bedroom units.*

We recognize that this policy provides “encouraged” prior to stating the preferred or target unit mix. Regardless, we have concerns about how enforceable this becomes. The vagueness of this policy provides City staff with the opportunity to treat this as more of a ‘requirement’, which in turn, would lead to many discussions and slow the development approvals process. We also question where the 50% target came from considering this is a very high number, particularly through the lens of larger 3 bedroom units. In addition to these concerns, we remind the City that the Inclusionary Zoning for PMTSAs has been established, and further, that the Housing Assessment requirements have been removed as a required application submission deliverable. We interpret this to mean that the City believes that IZ is an appropriate response to ensuring affordable housing is provided for, and in turn has identified where new affordable housing is to be placed. We agree with that. Policy 5.2.3 would frustrate the timely approvals for development applications and present a market barrier by providing for units that may not sell, as evidenced in excerpts from the Mayors Task Force Report from January 2025.

Please feel free to contact us if you have any questions, require more information, or wish to discuss further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.


 Sarah Clark, Associate
 MCIP, RPP

cc. Councillor Alvin Tedjo
 Andrew Whittlemore, Commissioner of Planning, City of Mississauga
 Jason Bevan, Director of Planning Strategies



Planning and Building Department
Development and Design Division
300 City Centre Drive
Mississauga, ON L5B 3C1

Wednesday February 26th, 2025
DPS File: 2375

RE:

**66 & 64 Thomas Street, 95 Joymar Drive, & 65 Tannery Street
City of Mississauga
Regional Municipality of Peel
Comments regarding Draft Mississauga Official Plan 2051**

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 second input letter to the City of Mississauga (“City”) regarding the Draft Mississauga Official Plan 2051 released on January 21st, 2025 (“Draft OP”). Our first input letter was submitted on December 6th, 2024, based upon a previous version of the 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”, whereas in the 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”. Based on our review of the applicable policies, 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 station⁶ 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 were advised about a proposed development that would facilitate high-density intensification of the Subject Property. In January 2025, City Staff released a response matrix to all public comments received on the Draft OP through the previous public meeting. Within the response matrix, City Staff responded to our previous input letter and noted the DARC meeting and subsequent development application process is the appropriate channel for a change to the designation in the Official Plan. Although applications for an Official Plan and Zoning By-law Amendment have been submitted and deemed complete on January 17th, 2025, given the City is undertaking a review of the Official Plan and has proposed a draft new Official Plan, we respectfully submit that now is an appropriate time for the City to consider a change in designation for the Subject Property that would align with what is proposed through the submitted planning applications for the Subject Property. This would, at minimum, eliminate the need for an Official Plan Amendment application to facilitate the proposal.

As previously noted in our input letter, 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 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 achieve a more complete community by:

- Providing housing opportunities for residents of all ages;
- Increasing the supply of, and providing for a larger variety of, housing options within the Streetsville area and City;
- Facilitating development that is compatible with the surrounding land uses by providing a gentle increase in density relative to the adjacent existing built form;
- Contributing to the existing diversity of the housing stock in the Streetsville Strategic Growth Area;
- contributing to the overall minimum density target of the future MTSA;
- Contributing to an overall attractive and desirable environment within Mississauga and the Streetsville Planned MTSA;
- By enhancing the public realm as well as the overall vibrancy of the streetscape on Joymar Drive, Thomas Street, and Tannery Street;
- Utilizing existing higher-order transit in proximity and facilitating direct pedestrian connectivity to Streetsville GO Station; and
- Contributing to the promotion of active transportation.

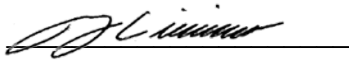
We would respectfully request that the Planning Staff reconsider the proposed designations applicable to the Subject Property within the new Draft OP to better align with the policy direction of the Province and Region to facilitate intensification and compact form in close proximity to higher-order transit, as detailed within this letter.

Please provide us with any and all notices of informal and formal meetings and decisions related to this new proposed Official Plan.

Should you have any questions or concerns please do not hesitate to contact the undersigned.

Sincerely,

DESIGN PLAN SERVICES INC.

A handwritten signature in black ink, appearing to read 'T.J. Cieciura', is written over a horizontal line.

T.J. Cieciura, MSc MCIP RPP
PRESIDENT

Encl.

TJC/di

Cc. Mark Palmieri, DeZen Realty Limited

Taranjeet Uppal

From: Samar <samarmssac@gmail.com>
Sent: Wednesday, February 26, 2025 4:29 PM
To: Official Plan
Cc: Amina Menkad; Ben Phillips; Office of the Mayor; John Kovac; sponsorship@mississaugaswimming.com
Subject: [EXTERNAL] Mississauga Official Plan Open House
Attachments: AquaticCouncil_Report01.10.25.pdf

[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.]

Dear City Officials,

I hope this message finds you well. As part of the upcoming Official Plan Open House, I would like to bring forward two key considerations on behalf of the **Mississauga Aquatic Club (MSSAC)** and the broader community of swimmers and athletes in our city.

1. Designated Home Pool for the Mississauga Aquatic Club

The Mississauga Aquatic Club, a non-profit organization that has been a cornerstone of our community for over 60 years, has played a vital role in developing athletes, supporting swimmers of all ages, and fostering a love of the sport. MSSAC is the only swim club representing the City of Mississauga with Swim Ontario and Swim Canada. Our club serves over 500 swimmers each season. Currently, MSSAC does not have a permanent, designated home pool for training and competitions, which limits the club's growth and hampers the overall experience for its members. We strongly advocate for the inclusion of a dedicated training facility within the city's future plans. One potential solution is for the City to allow MSSAC to lease the Cawthra Park Secondary School pool, which is set to be decommissioned in the near future. This would provide an immediate, viable option for the club to have a designated space while more permanent solutions are being explored. Leasing this facility would not only provide MSSAC with much-needed access to a pool but would also ensure that this public infrastructure continues to serve the community before its closure.

2. Construction of a 50M Pool in Mississauga

As a major city in Ontario, Mississauga deserves the same level of aquatic infrastructure that smaller cities like Guelph and Hamilton already benefit from, both of which have 50-meter pools. A 50-meter pool is essential for fostering high-performance swimming, hosting large-scale competitions, and supporting recreational swimming at all levels. Mississauga currently lacks a facility of this size and scale, which limits the city's ability to attract regional, national, and international swimming events. This puts Mississauga at a disadvantage compared to other cities that are able to host high-profile competitions and promote sports tourism. Constructing a 50-meter pool in Mississauga would help elevate the city as a hub for aquatic sports, benefiting both local athletes and the community at large.

Additionally, the Aquatic Council has released a white paper that provides strategic recommendations to help government officials prioritize and streamline investment in aquatic infrastructure. This white paper offers insights into the importance of investing in aquatic facilities to meet the needs of both recreational swimmers and competitive athletes. We encourage the City of Mississauga to review this document (see attached), which will provide a well-informed foundation for making critical decisions about aquatic infrastructure moving forward.

We believe that these two initiatives—a designated home pool for the Mississauga Aquatic Club and the construction of a 50M pool—align with the city’s goals of promoting healthy, active living and supporting world-class sports facilities. We urge the City of Mississauga to include these proposals in the next phase of the Official Plan to ensure that future generations of athletes have access to the resources they need to succeed.

Thank you for your time and consideration of these important community needs. We look forward to further discussions at the upcoming Open House.

Sincerely,
Samar Daoud, P.Eng
Board of Directors
Mississauga Aquatic Club
647-929-4878

A photograph of three young children swimming in a pool, wearing blue swim caps and yellow kickboards. A woman, likely an instructor, is partially visible on the right, smiling and supporting them. The background shows pool lanes with red and white buoys.

Building More Aquatic Centres in Ontario

Aquatic Sport Council of Ontario

Executive Summary

There is an urgent need for Ontario to invest in more and larger recreational aquatic facilities to enhance health outcomes, stimulate the local economy, and provide complete communities that support new housing starts. Ontario must empower local stakeholders to develop these facilities and position itself as a leader in drowning prevention, building healthy communities, and athletic excellence.

Currently, the development of aquatic centres in Ontario is hindered by outdated assumptions of operational costs, a governance structure that makes it challenging to build larger aquatic centres, and an overall infrastructure deficit that forces municipalities to make difficult decisions on capital projects. Most indoor 50-metre (50m) pools in Ontario were constructed between 1970 and 2010, with only four built after 2000 according to a 2023 study by Aquatic Associates. This slow down in pool development is due to short-term funding plans that have put pressure on the municipalities and non-profits managing pool facilities. Historical trends indicate that larger pools have primarily been built in response to specific needs from universities or major

sporting events, such as the Pan Am Games, which has left many Ontario communities without sufficient access to facilities.

Public opinion polling completed by Pluriel Research in the summer of 2024 indicates strong support for expanding pool programming and infrastructure, especially among parents with young children. However, barriers such as long travel time to facilities and limited access to swim programs hinder participation.

This lack of infrastructure negatively affects community vibrancy by limiting options for learn-to-swim lessons, recreational aquatic activities, water-based rehabilitation programs, water-based sports, and opportunities for local sport tourism.

To address these issues, Ontario needs to take a proactive approach to pool construction, anticipating future needs rather than reacting to them. By investing in recreational infrastructure, Ontario can attract residents, boost the local economy through sport tourism, and improve public health through increased access to exercise and



enhanced drowning prevention programs. The ability of municipalities to deliver their core services, and the expansion of learn-to-swim initiatives is particularly critical to this approach.

Pool operators suggest that increasing pool sizes significantly enhances usage rates if supported by optimized designs and energy-efficient systems. Industry professionals have shared that pool operators could triple their use if they could double the pool size and enable municipalities to generate more revenue to support pool programming.

To support the development of larger, 50m pool facilities, the province should assist in the construction of regional recreation facilities that serve multiple aquatic and recreational purposes.

These hubs would centralize resources, allowing municipalities to deliver essential services more efficiently while providing opportunities for aquatic sport clubs to rent space. A well-designed facility anchored by a 50m pool could attract large-scale competitions and events that smaller venues cannot accommodate. To facilitate this vision, the Aquatic Sport Council of Ontario is urging the government

to establish a dedicated funding application process for constructing regional recreation facilities with larger pools. This process should facilitate financial and development support from conception through to construction and address the financial barriers many municipalities face in constructing multi-use, 50m pools. The applications should be reviewed and approved for funding by the Minister of Sport and the Minister of Infrastructure to ensure that the regional facilities are being placed strategically, in locations that can support the aquatic programming, and built to maximize programming and operating efficiency.

The Aquatic Sport Council, is comprised of representatives from:

- Dive Ontario
- Lifesaving Society
- Ontario Artistic Swimming
- Ontario Water Polo
- Parks and Recreation Ontario
- Swim Ontario

Ontario is Falling Behind on Pool Construction

A **50-metre pool** can bring three times the programming for twice the pool size. A strategically placed 50m pool allows for greater access to swim lessons, swim team training, fitness training, and can attract out-of-town swimmer for tournament and other significant aquatic competition activities.

In underserved communities, a 50m pool can help provide enough pool time for growing populations while also benefitting surrounding service and hotel businesses.

50m pools should have 10 lanes, a warm-up tank, and be 2.5m deep to accommodate a full range of activities.

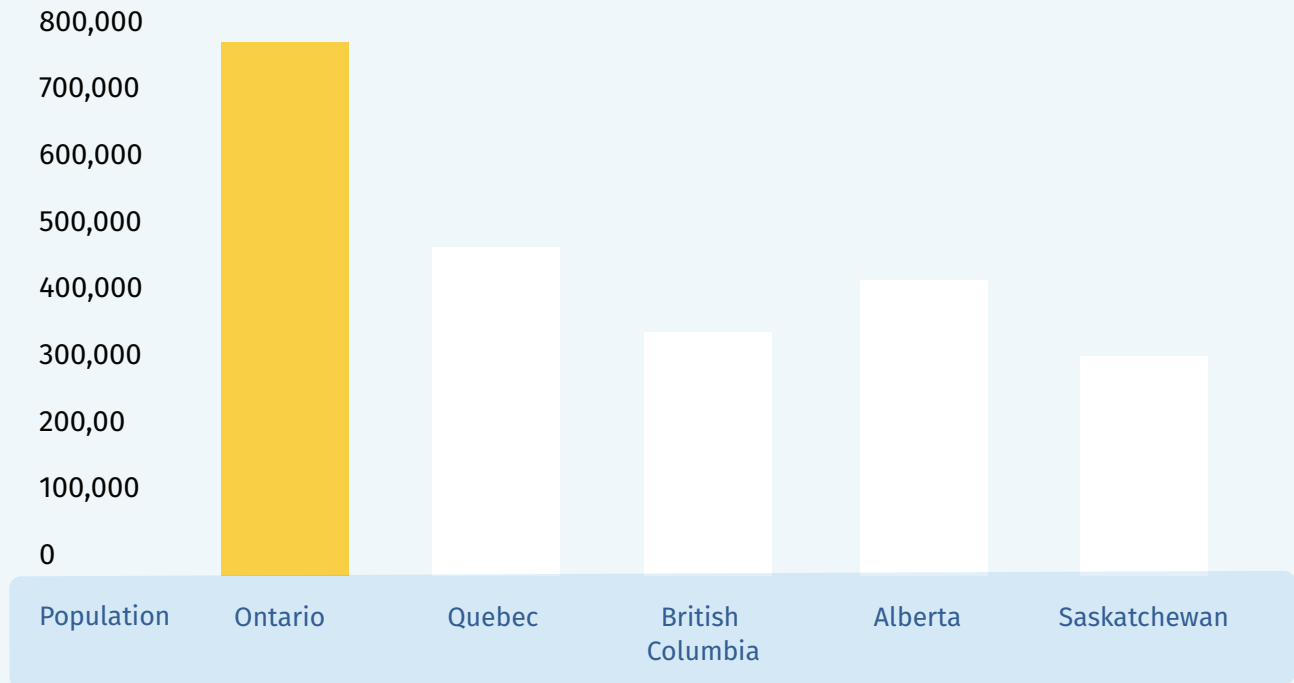
In Ontario, planning for aquatic infrastructure happens at the municipal level of government. There are currently no provincial standards for pool infrastructure requirements, nor is there a process for ensuring adequate aquatic infrastructure is distributed fairly across the province. The province needs to begin anticipating future gaps in pool infrastructure and should establish the cross-jurisdictional dialogue required to implement cost-effective and efficient construction.

In the past two decades, Ontario has suffered from a lack of pool development and insufficient funding. The majority of indoor 50m pools in Ontario were built in the 1970s, 1980s, and 2010s. Only four 50m pools have been built after the year 2000. As a result, Ontario is falling behind its counterparts across Canada.

Ontario has a population of 14 million, approximately 40 per cent of Canada's population, but only 30 per cent of the 50m indoor pools. Further, six of the seven largest cities in Canada without 50m indoor pools are in Ontario. The data is clear: there aren't enough 50m pools in Ontario to serve the needs of its growing population. The gap in Ontario's pool infrastructure becomes even greater when compared to other provinces across Canada; Ontario's 50m pool to population ratio is 1:748,629. This is the second highest ratio in the country.

There is a correlation between stagnated 50m pool development and the withdrawal of government involvement. The lack of aquatic facility development is partly due to municipalities withdrawing their support from the development and operation of large pools. Ontario is the only province where 50m pools developed by institutions and for major games outnumber those built by municipalities, or other levels of government.

Population Ratio per 50m Pool



Ontarians experience double the competition to accessing 50M pools compared to the rest of Canada



Toronto Pan Am Sport Centre

Ontarians Want to Swim

Access to Pools is Integral to Developing Better Health Outcomes

Aquatic infrastructure provides community members with several benefits, including the opportunity to participate in sport and fitness, access rehabilitation/therapy programs, build social connection, and attend and participate in special events and sport tourism. Most importantly, and most desired by community members, is the increased availability of learn-to-swim programs that improve water safety and aid in drowning prevention. Learn-to-swim also indirectly provides users with access to the full capacity of pool programming; by learning and knowing how to swim, users can expand their participation in alternative aquatic programming, thus developing healthier lifestyles and good exercise habits. Access to pool-based fitness and recreation programs like diving, water polo, or artistic swimming require the ability to swim, reiterating that learn-to-swim programs are the foundation of aquatic participation.

Beyond the benefits felt by the general population, pools serve an even higher function for older adults, pregnant women, and those with different physical abilities who prefer or require an aquatic setting to perform exercise, as hydrotherapy is shown to cut down on recovery time. Access to exercise, specifically low-impact forms such as swimming, have been linked to a range of health benefits, from reducing rates of chronic diseases and rehabilitation from injury, to improving mental health. Pools, therefore, play a role in reducing the financial strain on the provinces' healthcare system.

Perhaps the most significant health benefit that can be gained from access to pools, however, is the prevention of drowning instances. Based on numbers provided by the Lifesaving Society: in 2020, 211 people in Ontario died from drowning, the highest number in a decade. In 2018 alone, deaths due to drowning resulted in an economic loss of \$175 million, and hospitalizations place an additional \$8 million dollar strain on the healthcare system, annually. Thirty-eight per cent of water-related fatalities occur while swimming in open bodies of water. By providing more opportunities to access and participate in aquatic programming, there is significant potential to decrease the amount of death and injury, and reduce some of the public healthcare system's financial strain.

Ontarians Like Swimming, Know It's an Important Skill and Want More Access

For the purposes of this submission, Pluriel was contracted to perform public opinion polling to determine Ontarians' feelings about pool infrastructure across the province.

This polling identified some significant trends:



56 per cent of Ontarians would like the government to make building new swim infrastructure a higher priority, with 77 per cent of identified PC voters considering an investment in new swim infrastructure to be a very or somewhat good investment.



Across all party supporters, the majority of Ontarians would like to see the provincial government invest more money into public swim infrastructure.



Parents of children under 18 are the most frequent users of public pools.



Parents and young adults indicated a high demand for pools: 41 per cent of parents would be more likely to use a public pool, and 37 per cent of Ontarians aged 18-34 say they would be much more likely if access was more available.



52 per cent of Ontarians would like the government to provide more facilities where future Olympic athletes can train and compete.

- *This includes the majority (51 per cent) of likely voters in the next provincial election.*

These results emphasize the need for pool infrastructure across the province and suggest that Ontarians are in strong support of investing in aquatic infrastructure.

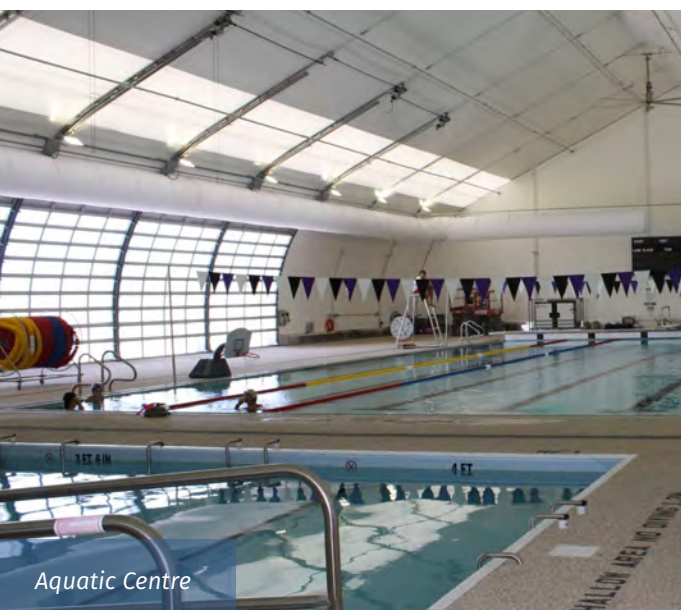
Families Want to Live in Communities with Recreational Activities, Pools

As the province continues to expand its availability of housing options, it is critical that a corresponding plan to develop and increase access to recreational programming -- especially pools -- is also developed. Regions that offer a wide array of recreational programming appeal to families looking to create roots, raise children, and grow older.

Given the constraints on pool availability, many families gravitate to urban areas where recreational infrastructure already exists. This puts greater stress on housing affordability in those high-density areas and leaves many areas of the province struggling to attract new families to support their growth, property tax base, and local economy.

If the government is looking to make housing more readily available and affordable in various areas of the province, they should consider areas that lack regional recreation facilities with aquatic centres and focus efforts on supporting municipalities to build recreation as a cornerstone of their community.

Ignoring the need for recreational programming, or expecting smaller municipalities to bear the costs of designing and constructing an aquatic/recreation centre, only prolongs the existing issues related to access and availability.



Municipalities Are Key to Pool Delivery and Need Support

From construction to operation, municipalities are responsible for public recreation facilities; they are the primary drivers of pool construction. Local governments respond to their communities' desires for athletic and recreation facilities and know where additional services are needed. Municipalities are also responsible for operating and maintaining pools and pool programming, ensuring longevity of the asset to maximize public benefit.

Ontario's *Municipal Act* designates 'culture, parks, recreation and heritage' as one of 11 spheres of jurisdiction for municipal governments.

Unfortunately, many municipalities face significant capital funding challenges, leading to pool size and programming being one of the first items cut during the design process.

Municipalities are increasingly under financial strain due to competing financial priorities and raising the capital required for a new aquatic facility is a long and complex process. To build pools and their associated infrastructure, municipalities are sourcing large portions of capital through debt financing and development charges, and creating financial liabilities that must eventually be resolved. The prohibitive cost and limited revenue tools available to municipalities can make the idea of building new aquatic facilities too daunting for some municipal governments.

Support from higher levels of government can ensure municipalities have adequate capital to build a quality asset, help minimize operating and maintenance costs, and provide the long-term public benefits offered by pool infrastructure. A provincial funding program dedicated to helping municipalities move aquatic facilities from conception to construction by supplying a portion of the necessary capital, would relieve the pressure on municipalities and create public benefit.

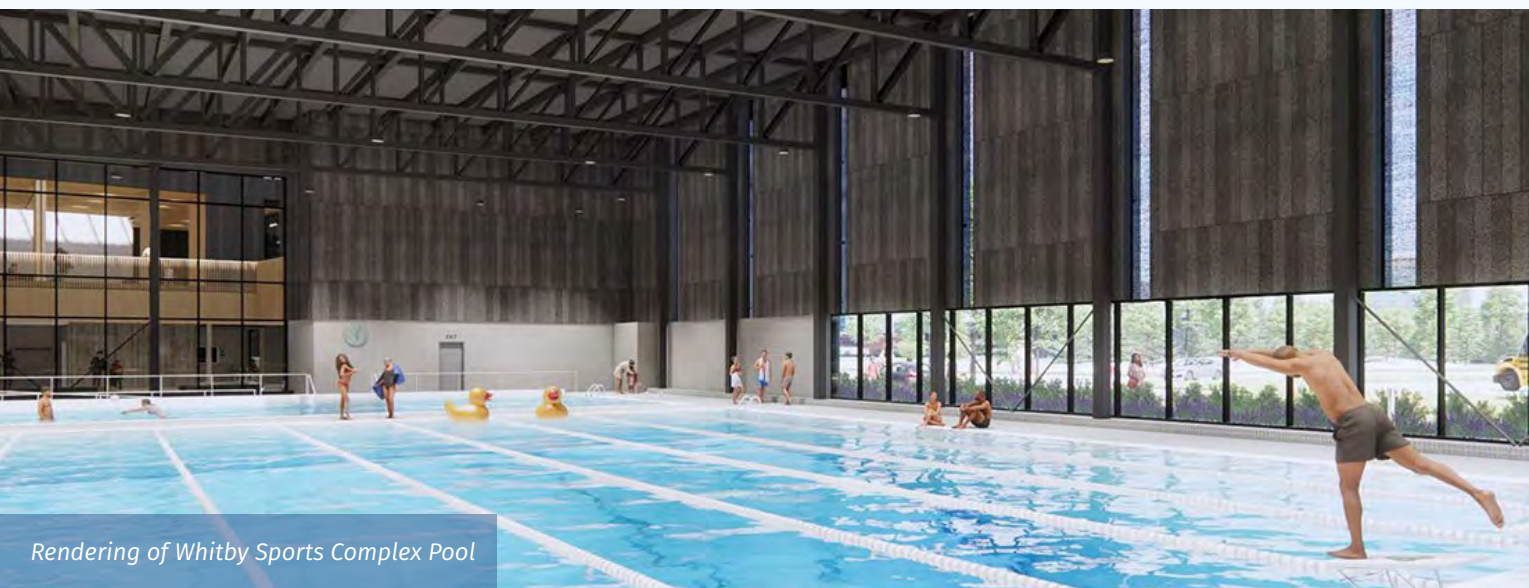
Such a fund would support municipalities building new, large pool areas or expanding existing facilities.

To maximize the impact of public capital and complement a provincial funding program, municipal governments should shift the way they design public recreation infrastructure by combining other recreation services and facilities with aquatic centres. By developing multi-use public spaces, complete with gyms, arenas, libraries, and/or service centres, municipalities can spread capital and operating costs over a wider set of revenue sources -- such as user fees for programming and rentals -- therefore increasing the efficiency of public spending.

Whitby hired a sport consultant to make sure their pool was set up for small athletic meets so they could get a diverse range of activities. The original scope doubled in size to have capacity for the projected population growth.

Funds for the complex came from Ottawa's Green and Inclusive Community Buildings (GICB) program. The facility includes a 25-metre, 10-lane pool, separate leisure pool and second floor spectator viewing area - which will make the Whitby Sports Complex home to the largest pool in Durham region.

**This state-of-the-art-facility will meet the immediate and future recreation needs of our rapidly growing community as well as the Town's environmental and climate commitments. It will be one of the first multipurpose recreation facilities in Canada to be certified as a LEED Gold and Zero Carbon Building through the Canada Green Building Council.* - Elizabeth Roy, Mayor, Town of Whitby.*



Rendering of Whitby Sports Complex Pool

A Regional Funding Strategy Will Address Need

Public capital would have the greatest impact if invested at strategically located regional recreation facilities across the province. These facilities would bring together spaces and resources for numerous activities -- such as multi-purpose gymnasiums, weightlifting facilities, arenas, and indoor tracks -- anchored by a 50m pool. This follows the Canadian Sport Institute (CSI) model, which operates multi-purpose athletic facilities across Canada, providing training opportunities for high-performance athletes and recreation programming opportunities for surrounding communities.

Centralizing spaces for numerous forms of activity and use allows for an efficient and effective use of public dollars, as overhead and staffing costs can be spread across numerous revenue sources. For instance, the staffing complement required to service a standalone pool can provide the necessary maintenance and administration for a range of spaces. A regional facility with pool, gym and arena capabilities can provide revenue-generating programming across all three, offsetting the overhead costs required to operate a larger facility.

For pools specifically, larger pools mean more programming and access to larger revenue streams. Athletic clubs (i.e., competitive swim and dive clubs), commercial use (i.e., rescue and scuba training), and large events like major competitions all generate considerable revenue but cannot be accommodated by smaller pools.

Targeted investment in specific regional facilities also allows for investment in technology to make operation more cost-efficient. Modern water temperature, and chemical balance monitoring and regulation systems support the most efficient use of operating funds, but are not accessible to smaller facilities due to their high upfront cost.

The **Markham Pan-Am Centre** has a 50-metre swimming pool with 10 lanes for competitive swimming. At 2.5 metres deep, the pool is also suitable for artistic swimming and water polo events.

The pool includes a moveable floor and configurable bulkheads. It can be set up to meet various sport requirements and allows for a multi-use configuration.

In 2022, the centre hosted 71 events and 375,000 visitors.

The Pan Am Centres (PACs) in Markham and Scarborough, and the Canada Games Complex (CGC) in Thunder Bay present excellent examples of strategically designed recreation infrastructure. These facilities provide a range of services, including 50m pools, athletics and training, recreation, and commercial space, all under one roof. The increased revenue generated through programming fees, rentals, and leases offsets the overhead costs required to operate larger facilities. Each facility is large enough to provide services to a large user base, servicing the broader GTA and northern Ontario regions.

Ultimately, the greater scale of large regional facilities also creates a broader economic and service impact. More jobs are created in the facility's construction and operation, a broader programming range provides more recreation opportunities for community members, and it brings potential for new businesses and services. The regional aspect means fewer public dollars are required to impact a greater number of Ontarians.



Markham Pan Am Centre

Triple the Use for Double the Pool

Local and regional governments aim to generate revenue to assist with the operation of pools; a task which is made easier by building indoor, all-season 50m pools.

These 50m pools allow municipalities to offer low-cost drop-in and recreational access, while enabling them to generate greater revenues for permitted and sport training uses.

Pool operators are keen to modernize their programming and combine the innovations being made in pool construction and operations. By integrating the approach to construction, operations, and programming in the planning phases of a new or retrofitted pool, municipalities can reduce the gap between operating costs and programming revenue, and the larger pools will create opportunities for sport tourism to thrive.



Procurement and Design

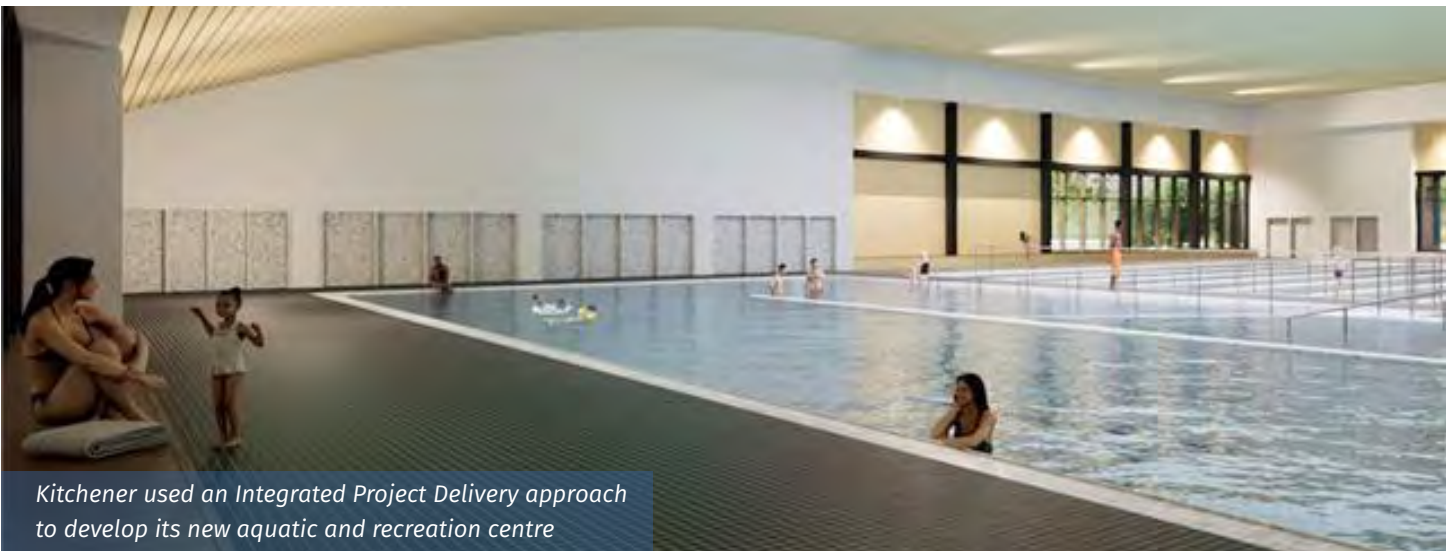
Collingwood - Centennial Aquatic Centre Built in 1967, Collingwood decided to enclose their facility in 2013. Collingwood chose a tension fabric structure, a fast, reliable and innovative solution. Construction took just 6 months. The new cover was accompanied by upgrades to the pool.

Knowing how a recreational centre will run, and who will use it, helps focus the design of the physical structure. There are a range of development strategies that can be used to ensure an anchor facility, like a 50m pool, is built in a cost-effective way, will be able to operate efficiently, and will support a range of uses.

Integrated Project Delivery is a procurement model that allows a funder and a contractor to work together to finalize design elements and a construction plan in a collaborative way that can enhance building performance.

Using new, cost-efficient building materials can help control construction costs, which helps make these large infrastructure projects more incentivizing for municipalities to build. For example, some municipalities are using tension fabric membranes to cover new aquatic recreation facilities. These can be built on their own or adjacent to a larger recreation facility and can accommodate 25m or 50m pools.

To build the number of pools needed to meaningfully improve access in Ontario, partnerships will be necessary. Not just partnerships between municipalities and federal and provincial funders, but also partnerships between neighbouring municipalities and not-for-profits. For smaller municipal communities that don't have the capacity to build new facilities on their own, partnering with surrounding municipalities can help create the capital needed to build a new pool, while also contributing to a facility that their constituents will likely use.



Kitchener used an Integrated Project Delivery approach to develop its new aquatic and recreation centre

In Ontario's fast-growing 905 suburbs (Mississauga, Brampton, Burlington, Markham, Oshawa), sport and recreation services are delivered solely by local municipalities, not regions or counties. Filling the gaps in access for 50m, regionally significant recreation centres anchored by a pool will likely require municipal partnerships and potentially regional or county leadership. Ontario's flagship aquatic centre, the Toronto Pan Am Sports Centre is an example of a successful partnership.

In Europe, it is commonplace to develop an aquatic facility with additional empty space on the land with the intention of expanding the facilities in the future. This ensures that the aquatic facilities have supplementary space for expansion, allowing the space to adapt to the changing needs and financial obstacles that may arise in the future.

West Parry Sound Recreation and Cultural Centre Board



Parry Sound partnered with six municipalities and two First Nations groups to develop this project. The approved project was submitted in 2019 with a budget of \$32 million. Since then, the project budget has increased to \$36.4M due to construction price increases and changes such as the addition of two lanes to the lap pool. The Board has also worked with the community to increase spectator seating in the pool and gymnasium.

The capital project is funded at 73 per cent through an Investing in Canada Infrastructure grant.

Recreation Centre will include a 25-metre lane pool. The site work is complete, and the foundations are underway.

Operational Best Practices

As part of the design process, the pool should be developed with its future operation in mind. The building's footprint should be designed in a manner that supports airflow and provides enough space for effective filtration, water management, and waste disposal. This can help ensure future operational costs and performance are managed effectively. Energy is required to heat the water and the building via heating, ventilation and air conditioning (HVAC) system. To ensure these systems operate in harmony, and with maximum efficiency, it is important for the structural engineers and water engineers to work together throughout the development process.

The heart of every pool is its mechanical room. This is where the critical working components such as waste, water heating, and filtration operate. Over the pool's lifespan, most of the waste is created by turning over the water more frequently than is required by regulation. Many pools run five to 20 times more water than necessary. Often, it's because the water systems aren't being operated correctly.

Filtration systems are often under designed. Ontario pools don't have chemically assisted filtration, which results in low clarity of water. Current regulations require that all the water in a pool should be filtered every six hours. The Ontario Building Code states that every four hours water should be turned over. This often results in water being pushed through the filter at a rate too fast to perform adequately. When water begins to be pushed through the filter at a rate that creates channels, the water will rush through, rather than slowly percolate through the filter. The maximum speed for a sand filter should be 20 metres per hour (and for a multimedia filter, 30 metres per hour). Filters should be sized to get enough water at the correct speed to ensure proper filtration and timely turnover. Under designed filtration systems are common and can be avoided by incorporating four best-practice pillars: chemically assisted, biological, physical, and absorption (absorbing unclean substances from water).

The upfront design of the operations is critical, and there are many best practices in other jurisdictions we can learn from. For example, features like the circulation pump -- which injects water from the side of the pool -- could shift to bottom injection, which is used in Europe. The materials used for pools should also be carefully considered. These aspects affect the operational cost of an aquatic facility and can lower cost in the long run.

Operational efficiencies can also be executed administratively. A multi-use facility should optimize space by asking staff to perform multiple tasks.

Programming Best Practices

Learn-to-swim and wellness amenities are integral to maintaining a pool because they bring in consistent revenue through user and programming fees. It is considered best practice for competition facilities to have multipurpose functionality, and community amenities are considered the minimum for overall successful operation. Pools can and must generate revenue during the off-competition season and non-competition weekends, as well as any times pools sit empty. This can be done through careful program timing as well as through the establishment of cross-municipal networks. Both solutions can reduce dips in pool utilization and off-peak usage.

Prime recreation time can be competitive and municipal and not-for-profit pools must manage the various programming they offer. Low-cost recreation and lane swimming is a public service that many expect to be available at a public pool, but it does not generate significant revenue. Swimming lessons and swim club rentals can bring in additional revenues for pool operators; however, at the expense of limiting public access.

By integrating learn-to-swim classes, lane swim, lifeguard training, aquafit and other community programming, pools can generate a better return for each operating dollar. This integration of programming requires a larger facility however, which is why 50m pools introduce the possibility of doubling revenue. Activating the space with this level of service efficiency helps protect the longevity of the facility.

Understanding local needs, such as the physical and water quality requirements for each user group, is essential to maximizing programming revenue. Depth, deck width, lane widths, accessibility resources, and spectator space can all determine if certain activities can utilize a pool.

Providing regional access to larger pools and identifying the programming methods to help sustain a 50m pool can help ensure the facility is more financially sustainable and has the capacity to grow along with the community. In some rare cases, there could also be a business case for an even larger, regional recreation centre that can cater to the provincial and national competition circuits, provide access to sport and daily swim training, and support the local service industry by hosting competitions.

Sport Tourism is an Economic Driver, Cannot Be Ignored

The **Toronto Pan-Am Sports Centre** is a world-class facility comprised of 312,000 square-foot of programmed space including internationally sanctioned 10-lane 50-metre pools, a world-class dive pool and dryland dive training facilities. This recreation centre offers programs for children, youth adults and older adults.

In 2023, the Centre hosted over 1.5 million visitors, and played host to a significant number of high-performance camps, swimming lessons, and local, national and international events.

Sport tourism is a growing contributor to both the Canadian and Ontario economies, demonstrating substantial potential for growth and economic impact at the municipal and provincial levels. According to the Government of Canada, sport tourism generated \$7.4 billion in value for the Canadian economy in 2019, an increase from the \$6.8 billion reported in 2018. Ontario continues to be the leading beneficiary of sport tourism spending in Canada. In 2019, Ontario saw \$2.45 billion from visitor spending related to sport tourism, accounting for the largest share among all provinces. This dominance is further emphasized by Ontario's 41 per cent share of the total volume of sport tourism visits in 2018.

This impact comes in the form of visitor spending and job creation, with spectators spending on accommodations, food, transportation, and retail, directly benefitting local businesses.

However, the proper facilities and infrastructure that are required to host, let alone compete for such opportunities, are lacking. Cities looking to host large events, ranging from regional competitions to international championships, must have appropriate facilities that can accommodate large-scale event needs. For competitive swimming and diving events, aquatic facilities must have the necessary lanes, depth and water temperature regulation, among other requirements, to comply with competition regulations.

Having the ability to host large events and attract visitors is essential to leveraging these major revenue generating opportunities. Sport tourism presents a significant opportunity for economic growth at both the municipal and provincial levels, with Ontario leading the way. To maintain this edge and leverage the growth in sport tourism, it's key that the province support pool construction.



Conclusion

Only four of Ontario's 50m pools have been built after the year 2000. Meanwhile, from 2000 to 2024, Ontario's population has grown by three million people.

Many of Ontario's 50m pools were built by, or in partnership with, growing post-secondary institutions. Others, like London's Canada Games Aquatic Center, and Toronto's Pan Am Sports Centre were built in conjunction with major athletic competitions.

Regionally significant aquatic infrastructure projects are needed in several areas in Ontario. The cost and regional benefit of these facilities goes beyond any one municipality; in Ontario's fastest growing suburbs, sport and recreation infrastructure is typically delivered by lower-tier governments, not regions. This makes it difficult for an individual municipality to build a new, 50m pool.

As Ontario's population continues to grow, and more families look to settle in areas that provide recreational programming, the need for larger pools to support a wide variety of uses is more apparent than ever.

Enhancing Ontario's pool system also means community members will have continued access to multi-generational, low-impact exercise. Water exercise is proven to reduce

chronic diseases, provide rehabilitation from injury, and contribute to improved mental health. This contributes to better health outcomes, lessening the financial strain on the province's health care system.

Industry experts have laid out the path to creating larger pools, how the province can support the efforts of municipalities, and measures that can be taken to design and build more efficient, and more economical pools and recreation facilities.

The provincial Ministry of Sport plays an important role in promoting excellence and well-being across several sports in Ontario, and the government supports many amateur and professional sporting events through various funding programs. New 50m pools will create more opportunities for athletic competitions for all of Ontario and bring economic impact benefits to surrounding businesses through hotel and restaurant use.

Ontario should develop an intake process to support the development of concept planning, designing, and funding of new regionally significant aquatic centres to increase the capacity of municipalities to deliver core services, and consider the following recommendations to achieve this.

Recommendations

The Government of Ontario Should:

- Establish a fund for Ontario municipalities to apply for grants to support the construction of 50m pools.
- Create an intake and application process for regionally significant recreation centres with a 50m pool as an anchor, and work with municipalities to develop and fund projects on a rolling basis.
- Work with the Aquatic Sports Council and other partners to design a best-practice guide for pool design, rehabilitation, and construction.
- Ensure municipalities and not-for-profits receiving public funding for pools include an operating efficiency plan in their funding application.
- Update Ontario's public pools water quality regulations to align with the Centre for Disease Control's model aquatic health code.
- Review Ontario's Building Code to ensure public pool construction aligns with operating best practices.
- Support the creation of a best practices guide to support pool operators and programmers to maximize revenue generation at aquatic facilities.

About the Aquatic Sport Council of Ontario

Aquatic sports, similar to many sport disciplines, face serious infrastructure issues across Canada and especially in Ontario. The Aquatic Sport Council of Ontario believes that good aquatic facilities are fundamental to developing sporting opportunities for everyone, from the youngest beginner to the international class athlete. These aquatic buildings encourage civic pride and assist the process of revitalizing deprived neighbourhoods.

Facilities that are well designed, built to last, and well maintained provide the best return on investment and are more enjoyable to use. The best designed facilities are rooted in a sound understanding of the current trends, practices, and developments across various aquatic sports, and rely on good design principles at every stage of the process.

The Aquatic Sport Council of Ontario aims to promote a greater general understanding of overall design concepts, an appreciation of technical issues, and the critical factors that need to be considered in reaching the appropriate solution for a particular project. The Aquatic Sport Council of Ontario can also advise where further information, advice and expertise may be found and point to benchmark examples. This is fundamental to ensuring:

- Increased awareness of good design in sports facilities.
- Accurate information about the [facility specifications](#) required for competition in each aquatic sport.
- Tools to assist pool operators and sport groups understand the opportunities to work collaboratively for the best uses of space and resources.

March 3, 2025

Ben Phillips, Project Manager
Amina Menkad, Project Lead
City of Mississauga
300 City Centre Drive
Mississauga, ON L5B 3C1

e: official.plan@mississauga.ca

Dear B. Phillips and A. Menkad:

**RE: Draft Mississauga Official Plan 2051
30-110 Courtneypark Drive East and 40, 75 & 90 Annagem Boulevard
OUR FILE 10179AI**

Please accept this comment letter regarding the proposed draft Mississauga Official Plan 2051 ('MOP 2051') as it affects lands at 30-110 Courtneypark Drive East and 40, 75 & 90 Annagem Boulevard (the 'Subject Lands') also known as the Mississauga Entertainment Centrum (the "Centrum"). MHBC Planning represents the registered owner of the Subject Lands, Mississauga Entertainment Holdings Inc.

Subject Lands Context

The property is located north of Provincial Highway 401, west of Highway 410 and south of Highway 407. The property has frontages along Hurontario Street, Courtneypark Drive East, Edwards Boulevard, and Annagem Boulevard. It is split into a north and south portion by Annagem Boulevard as shown on the Location Map below.

The Subject Lands are currently developed with a commercial centre that consists of 12 buildings with a total gross floor area of 25,108 square metres (270,260 square feet) and accommodates a fitness centre, restaurants and entertainment uses. The Subject Lands have functioned as a commercial centre since the late 1990s, serving the surrounding employment area and beyond. Built forms on site include single-tenant commercial buildings, multi-tenant commercial buildings and a large Cineplex movie theatre building with a landscaped pedestrian plaza (see site images in Appendix 1). There is also a hotel which shares a parking lot with the centre but is not technically associated with the Subject Lands. The combined area of the Subject Lands is approximately 10.7 hectares.

Location Map



Over the years, an increasingly restrictive policy and regulatory framework has been applied to the Subject Lands, overlooking its on-going commercial function. Given this restrictive framework, the only commercial uses that are permitted as per the parent zoning by-law are restaurants, a cinema and a fitness centre. The Owner has been challenged in the past with filling commercial vacancies within the centre given that the range of permitted commercial uses is limited while the existing buildings and site layout is geared specifically to commercial businesses (refer to the images in Appendix 1). Understandably, it is challenging to fill 270,260 square feet GFA that is specifically designed and built for commercial uses if there is only a very limited range of commercial uses permitted. A series of variances were approved in 2024 which provided some relief with respect to filling leasing opportunities that came up at that time but a long-term solution that allows the commercial centre to continue operating effectively over time is required.

Additionally, given that the Subject Lands are technically located within one of the City's employment areas, the restrictive conditions have only been re-enforced with the new Provincial definition of "Areas of Employment" that came into force on October 20, 2024, which further precludes standalone commercial uses within employment areas.

Draft MOP 2051

Within the draft MOP 2051, the Subject Lands are proposed to be designated Business Employment (Schedule 7: Land Use Designations), Gateway Corporate Centre Employment Area (Schedule 1: City

Structure), Courtney Park PMTSA (Schedule 8: PMTSAs), Special Permissions Areas on Map 16-8 and Special Site 24 in Chapter 17.^{6.5}

These designations, and specifically the Special Permissions Areas designation, restrict the permitted uses on site to only office, manufacturing, overnight accommodation and research and development (Policy 16.10.2). Given the preamble of section 16.1, we understand that the Gateway Corporate Centre Employment Area is an Area of Employment as defined under the Planning Act, meaning that commercial, office and hotel uses are not permitted. Therefore, it is unclear how Policy 16.10.2 allows such uses.

Regardless, these use permissions do not take into account the existing commercial functions of the Subject Lands. The existing built form is not designed for employment uses and would require wholesale eviction of tenants, demolition and redevelopment in order to accommodate the change in use. This would be an extreme outcome resulting in substantial hardship for existing business and the landowner as well as the removal of an important commercial centre that has traditionally served the surrounding area. Mississauga Entertainment Holdings Inc. has made substantial investments into the Centrum over the years and intends to continue operations in the long term.

Requested Modifications to MOP 2051

The Centrum serves an important commercial function for the surrounding employment area and beyond. This commercial function needs to be protected over the long term. The existing and proposed land use policy framework do not recognize this commercial function which has been present on the Subject Lands since the late 1990s. Therefore, we request that draft MOP 2051 be revised as follows, to ensure that the Centrum's long-term operations are not compromised:

- **Remove from Employment Area** – As noted above, the preamble to Section 16.1 suggests that the Gateway Corporate Centre Employment Area is an Area of Employment as defined by the Planning Act meaning that permitted uses are restricted to manufacturing, warehousing, R & D related to manufacturing, and accessory uses. Standalone commercial and office uses are specifically prohibited. However, permitted uses for the Gateway Corporate Centre Employment Area as listed in Policy 16.10.2 permit some of these restricted uses.

We request that the Subject Lands either be removed from the employment area or, given the discrepancy in permitted uses in Policy 16.10.2, that specific policies be added to indicate that Special Permissions Areas are not considered part of the employment area.

Ensuring that the Subject Lands are not located within an employment area will set the base framework for a land use designation that will allow the Centrum to continue its operations in the long term.

- **Identify as Special Site** - Identify the Subject Lands as a Special Site in the Gateway Corporate Centre Employment Areas and add policies that recognize the existing commercial functions and built form and expands the range of commercial uses that are permitted. MOP 2051 already contains Special Site policies that recognize commercial uses in other employment areas like Site 1 which recognises an existing commercial development within the

Meadowvale Corporate Centre Employment Area. Recognizing the Subject Lands through a Special Site policy will ensure that the Centrum can continue its operations and respond to market demand over time. We request that the following Special Site policy be added to Chapter 17:

Site XX (Gateway Corporate Centre Employment Area)

17.xx.1 The lands identified as Special Site xx are located east of Hurontario Street, south of Courtneypark Drive East, west of Edwards Boulevard and on either side of Annagem Boulevard. These lands are known as the Mississauga Entertainment Centrum and contain an existing commercial development that serves an important commercial function.

17.xx.2 In order to ensure that the commercial function of Special Site xx is protected, the following additional policies shall apply, notwithstanding the other policies of this Plan:

a. The following additional uses shall be permitted:

- i. Entertainment, recreation and sports facilities;*
- ii. Financial institution;*
- iii. Personal Service or Service establishment; (see general comments below)*
- iv. Restaurant; and*
- v. Retail store.*

b. Existing buildings and parking areas can be modified, altered and expanded irrespective of minimum height and density requirements. It is also recognized that given the campus-planned nature of the site, some buildings are not directly street-related in location and design and that surface parking areas are important for site access. It is encouraged that this be addressed, but recognized that it may not be possible in the context of expansions or alterations to existing buildings which shall be permitted.

- **General comments**

- Throughout Draft MOP 2051, there are references to both “service establishment” and “personal service establishment”. Neither are defined in the draft MOP 2051 but it appears that these terms are being used interchangeably to refer what Zoning By-law No. 0225-2007 defines as “service establishment” (...*where services are provided for individual needs and where retail sale of goods accessory to the service provided is permitted and includes, but is not limited to, health and beauty services, tailoring, shoe repair, repair service, tutoring, laundromat, and/or dry cleaning establishment*). This creates confusion in interpreting the Plan as the list of permitted uses for some designations includes only one of the two terms while others include both. For example, Downtown Core Mixed Use lists both as permitted uses but only allows “service

establishments" to be on the ground floor of Retail Activation streets per Policy 12.7.19.⁶⁵ To avoid confusion, only one term should be used throughout MOP 2051.

- o Policy 16.10.2.1 appears to contain a typo in its map reference to resulting in a reference to the Lisgar Neighbourhood Character Area instead of the Gateway Corporate Centre Employment Area.

Conclusion

MOP 2051 provides a bold and forward-looking vision for the City of Mississauga, particularly for its employment areas and higher order transit corridors. However, as this vision is realized over time, it is important to ensure that existing businesses are protected and allowed to thrive and serve the people that have come to rely on them. Mississauga Entertainment Holdings Inc. has made substantial investments into the Centrum over the years developing a site that serves an important commercial function, providing services to employees within the surrounding area and beyond. It is imperative that existing bricks and mortar businesses within the Centrum be allowed to thrive and that existing commercial buildings not be burdened with vacancies and "for lease" signs. This can be achieved by removing the Subject Lands from the City's employment area and introducing Special Site policies that expand the range of permitted commercial uses. Increasing the range of commercial uses will ensure that as local market demand for goods and services changes over time, the Centrum will be able to satisfy that demand with an appropriate tenant mix.

Lastly, it is important to note that the province's intent with respect to limiting permitted uses within employment areas was to ensure that, if municipalities are establishing employment areas that are protected from conversion, then such areas must be used for uses that truly cannot be located elsewhere in the City. The intent was not to create large swaths of City that lack commercial uses which serve its employees and residents.

We would be pleased to meet with staff to discuss the requested revisions.

Yours truly,

MHBC



Gerry Tchisler, M.Pl., MCIP, RPP
Partner

cc: Jeff Lumsden, Manager of Development, PenEquity Inc. (on behalf of Mississauga Entertainment Holdings Inc.)

APPENDIX 1: SITE IMAGES

6.5







March 5, 2025

GSAI File: 893-004

Planning & Building Department
City of Mississauga
300 City Centre Drive
ON, L5B 3C1

Attn: Ben Phillips, Project Manager
Amina Menkad, Project Lead

**RE: Mississauga Official Plan Review – Consolidated Draft Policies
Park Heights Ltd
City File: CD.02-MIS
65 Park Street East
City of Mississauga**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission on comments to staff on the City's Official Plan (the "Official Plan") review as an extension of previous correspondence submitted to your team and to Planning and Development Committee.

Generally, our submissions in the past have encouraged the City of Mississauga to employ a certain level of flexibility in their Official Plan policies with regards to site development. While there are some updates to the overall Draft Official Plan, we still have concerns surrounding a number of policies as currently drafted, including Urban Design policies and Housing policies, as well as height parameters amongst others.

Our concerns with the draft policies are described below.

Chapter 4, Sustaining the Natural Environment

Chapter 4 presents the City's natural environment policy framework. This includes policies related to a changing climate. We are concerned with Policy 4.2.2 which states:

'4.2.2. Mississauga will support the planning and design of new communities and buildings that aim to achieve near net zero emissions.'

The above-noted policy as drafted is concerning and has spill over impacts for the building and the development application process. This policy with an aim to achieve near net zero emissions will require significant investment and resources much earlier in the development approval process (Official Plan and Zoning By-law Amendment stage) resulting in significant barriers to approvals costs and timing. This early

investment could be significant and cause project delays all while not knowing if the fundamental land use approvals will be granted. We further question how staff will enforce this policy: will it be a pre-consultation requirement, through comments in the application with prescribed milestones by which they have to be fulfilled?

It is also not clear on whether this policy is a complement to the upcoming City Green Development Standard ('GDS') or meant to be a requirement in addition to the new City GDS which establishes a minimum score that must be adhered to, which only applies to those development applications that are proceeding through the Site Plan Control or Site Plan Approval process.

Chapter 5, Housing Choices and Affordable Homes

The following policy is noted:

5.2.3 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.*

The policy as drafted encourages this category of development to provide 50% of units as family-sized or two and three bedroom units. While it is appreciated staff are using the word 'encourage', the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. Beyond concerns on enforceability, we'd note the latter portion of this policy provides City staff with the opportunity to leverage the requirement by offering relief to certain types of development leading us to believe this will lead to protracted negotiations, effectively slowing the approvals process. In reviewing past City reports, it is not clear as to the origin of the 50% target considering that this is an exceptionally high number, particularly through the lens of larger/three bedroom units which do not always reflect historic and current market trends and price points.

Further, we remind the City that Inclusionary Zoning (IZ) for PMTSA's has been established, and further, that the Housing Assessment has been removed as a required application submission deliverable. We interpret this as meaning the City has established that IZ is an appropriate response to ensuring affordable housing is provided for which will help to contribute to options in the market, and in turn has identified where new affordable housing is to be placed. Policy 5.2.3 would frustrate the timely approvals for development applications and if it imposed on landowners would present a market barrier by providing for units that may not sell/rent, as evidenced in excerpts from the Mayors Housing Task Force Report from January 2025.

We have similar concerns with policy 5.2.4. Is the City responsible for achieving the '...appropriate range and mix of housing options....' including the Table 5.1 region-wide targets or will this be used to evaluate development applications? Again, requesting affordability requirements outside of IZ limits is contrary to the policy intent of areas subject to these requirements.

Chapter 8, Well Designed Healthy Communities

Chapter 8 presents the urban design-related policy framework. We are concerned with the urban design policies since firstly, Urban Design should be considered in guiding development, and secondly, if necessary, phrased in policy as “encouraged” if it is at all to be described within an Official Plan. Our concerns are based in our experience with development applications across the City, but also in relation to the direction as outlined by the Mayor’s Task Force noting further work should take place to evaluate these requirements.

Policy 8.6.2.5 states:

8.6.2.5 Transitions between buildings with different heights will be achieved by providing an appropriate change in height and massing. This will be done using methods that may include setbacks, the stepping down of buildings, angular planes, separation distances and other means in accordance with Council-approved plans and design guidelines.

Policy 8.2.9.c) states that the City’s vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. While we generally understand what the City is striving for, we maintain that this policy should be interpreted as flexible and not determinative. It sets a precedent for the underutilization of sites at a time when there is a need to provide housing. Further this creates ambiguity for interpretation by various City staff/reviewers when trying to navigate the meaning of “*appropriate change*”. The policy as drafted suggests that there are various ways and tools available to ensure appropriate transition is provided so we question the enforceability of this policy and the evaluative criteria to determine what an ‘appropriate’ transition is.

Embedding policy requirements to a largely qualitative urban design measure/tool is counterintuitive to smart growth and intensification strategies. Adding a policy element to urban design matters (previously subject to guidelines) will restrict development and efficient, high-quality built forms in the midst of a Provincial housing crisis.

We also find the following policy problematic:

8.6.2.11 Development proposals will demonstrate compatibility and integration with surrounding land uses and the public realm by ensuring that adequate privacy, sunlight and sky views are maintained and that microclimatic conditions are mitigated.

Policy 8.6.2.11 raises concerns is concerning because it is not clear what “compatibility” means and is unnecessarily restrictive in the newly revised definition in the MOP glossary. 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. This term should revert back to the previous definition as it better explains the reality of introducing new development into an existing context.

Beyond the definition, if a proponent is able to prove through technical analysis that compatibility is generally achieved with or without mitigation measures, the development proposal achieves compatibility. We question whether the City shares this opinion or if the development application process is under the assumption that compatibility could be subjective and therefore harder or if not impossible to achieve in certain circumstances.

Chapter 10, Land Use Designation

In previous correspondence, concerns were raised regarding policy 10.2.5.10 and in reply, the City note they would reword the policy. It does not appear to have been modified in the recently released draft of the MOP. While the policy modification is welcome, it is still troubling that staff have added so much detail when the existing City OP policy 16.1.2.4 appeared adequate and was relied upon by staff to evaluate applications. A current evaluation of what is appropriate development should not be hampered by what is likely an older policy planning regime, different economics, and building/site programming priorities in contrast to today's need to meet the housing crisis here in Mississauga.

PMTSA Schedule

Our client's lands are designated "Residential High Rise" on Schedule 8o with a height limited denoted as "2-15 storeys" on Schedule 8n.

It would appear appropriate to consider increasing height to provide an area of transition towards the concentration of transit infrastructure in the northeast corner of this PMTSA. Lands east and northeast of our site have heights of "2-30 storeys" which we believe reflects recent City development approvals as well as considerations for locating density around the tallest height permissions recently approved through the OLT. Our client's land is also immediately south (across Park Street East) from an existing 26-storey building (70 Park Street East). Based on this existing condition, new draft MOP heights of 30 storeys proximate, we believe our client's lands (and full block) should have an increased height of "22-25 storeys" to provide transition from lands further away from the transit infrastructure. It could be argued this transition height should also apply on lands north of Park Street East, and east of Queen Street East as they are residential blocks in closest proximity to the GO/MiWay transit infrastructure. This then allows for larger areas which can soften the transition in height to the existing/proposed conditions to surround development in Port Credit. As an aside, the minimum height should be revised to 12 storeys to reflect the height permission established in policy 10.2.5.10.

Chapter 11, Transit Communities (11.3 Protected Major Transit Station Areas)

While we are appreciative of the policy framework allowing for increased height in a PMTSA under policies 11.3.3.2 and 11.3.3.3, we are weary of urban design considerations noted in policy 11.3.3.2 over-riding the importance of new development needing to contribute to the PMTSA transit infrastructure. Further evaluation of the policies needs to be made to ensure development can occur unthwarted by rigid urban design requirements.

In order to align and implement the Mayor's Housing Task Force report and Council resolution responding to the objectives of building more housing, we respectfully request that the matters raised above for policy revisions or removal will be considered as we are concerned the MOP has introduced barriers to developments reaching final/design implementation stages.

Thank you for the opportunity to provide comments on the City's Official Plan Review. We would be happy to discuss and review in meetings or by phone our comments with staff, if necessary.

Sincerely,

GLEN SCHNARR & ASSOCIATES INC.



Maurice Luchich, MCIP RPP

Senior Associate

c: Park Heights Ltd.

March 5, 2025

GSAI File: 893-001E

Planning & Building Department
City of Mississauga
300 City Centre Drive
ON, L5B 3C1

Attn: Ben Phillips, Project Manager
Amina Menkad, Project Lead

**RE: Mississauga Official Plan Review – Consolidated Draft Policies
Forest Park Circle Apartments
City File: CD.02-MIS
4100 Ponytrail Drive and 1850 Rathburn Road
City of Mississauga**

Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission on comments to staff on the City's Official Plan (the "Official Plan") review as an extension of previous correspondence submitted to your team and to Planning and Development Committee.

As staff are aware, this site is currently subject to an open site development application with the City which follows previous approvals for new apartment development on the subject site (OZ OPA 12/009 W3). These enclosed comments are being provided partially from concerns, but also in light of our client's considerations for site development in a changing marketplace.

Generally, our submissions in the past have encouraged the City of Mississauga to employ a certain level of flexibility in their Official Plan policies. While we acknowledge and appreciate some of the changes we've seen through the updates to the Draft Official Plan, we still have concerns surrounding a number of policies as currently drafted, including Urban Design policies and Housing policies amongst others.

Our concerns with the draft policies are described below.

Chapter 4, Sustaining the Natural Environment

Chapter 4 presents the City's natural environment policy framework. This includes policies related to a changing climate. We are concerned with Policy 4.2.2 which states:

'4.2.2. Mississauga will support the planning and design of new communities and buildings that aim to achieve near net zero emissions.'

The above-noted policy as drafted is concerning and has spill over impacts for the building and the development application process. More specifically, a policy that requires buildings to aim to achieve near net zero emissions will require significant investment and resources much earlier in the development approval process (Official Plan and Zoning By-law Amendment stage) resulting in significant barriers to approvals costs and timing. The above-noted policy will have the indirect consequence of requiring significant investments in the earliest development approval stages in order for a developer to find a satisfactory solution for staff all while not knowing if the fundamental land use approvals will be granted. We further question how staff will enforce this policy and thus have concerns surrounding the possibility of significant timing delays through the development approvals process in resolving finalizing achieving near net zero emissions acceptable metrics.

It is also not clear on whether this policy is a complement to the upcoming City Green Development Standard ('GDS') or meant to be a requirement in addition to the new City GDS which establishes a minimum score that must be adhered to, which only applies to those development applications that are proceeding through the Site Plan Control or Site Plan Approval process.

Chapter 5, Housing Choices and Affordable Homes

The following policy is noted (with emphasis added):

*5.2.3 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.*

The policy as drafted encourages this category of development to provide 50% of units as family-sized or two and three bedroom units. While it is appreciated staff are using the word 'encourage', the policy as drafted is restrictive and in practice will challenge the delivery of much needed housing units in appropriate locations, in the midst of a Provincial housing crisis. Beyond concerns on enforceability, we'd note the latter portion of this policy provides City staff with the opportunity to leverage the requirement by offering relief to certain types of development leading us to believe this will lead to many discussions and negotiations, effectively slowing the development approvals process. In reviewing other City reports, it is not clear as to the origin of the 50% target considering that this is an exceptionally high number, particularly through the lens of larger three bedroom units which do not always reflect historic or current market trends and/or price points.

Further, we remind the City that Inclusionary Zoning for PMTSAs has been established, and further, that the Housing Assessment requirements have been removed as a required application submission deliverable. We interpret this as meaning the City has established that IZ is an appropriate response to ensuring affordable housing is provided for, and in turn has identified where new affordable housing is to be placed. There are no forced requirements in areas outside of the City's proposed Growth Nodes/MTSA's such as a Neighbourhood. Policy 5.2.3 would frustrate the timely approvals for development applications in Neighbourhoods, and beyond, and if it imposed on landowners would present a market barrier by providing for units that may not sell, as evidenced in excerpts from the Mayors Housing Task Force Report from January 2025.

We have similar concerns with policy 5.2.4. included herein:

5.2.4 The City will plan for an appropriate range and mix of housing options and densities that contributes to Regional housing unit targets shown in Table 5.1.

| Target Area | Targets |
|----------------------|---|
| Affordability | That 30 percent of all new housing units are <i>affordable</i> housing (rental and Ownership), of which 50 percent of all <i>affordable</i> housing units are encouraged to be <i>affordable to low-income</i> households The majority of units <i>affordable</i> to low-income households are anticipated to be rental and will include units such as subsidized housing, supportive housing, emergency shelter beds, and transitional housing. |
| Rental | That 25 percent of all new housing units are rental tenure These rental units include private rental market and non-market units |

Is the City responsible for achieving the ‘...appropriate range and mix of housing options....’ including the Table 5.1 region-wide targets or will this be used to evaluate development applications? Again, requesting affordability requirements outside of IZ limits is contrary to the policy intent of areas subject to these requirements.

Chapter 8, Well Designed Healthy Communities

Chapter 8 presents the urban design-related policy framework. We are concerned with the urban design policies as drafted in the Official Plan as firstly, Urban Design should be considered in guiding development, and secondly, if necessary, phrased in policy as “encouraged” if it is at all to be described within an Official Plan. Our concerns are based in our experience with development applications across the City, but also in relation to the direction as outlined by the Mayor’s Task Force noting further work should take place to evaluate these requirements.

Policy 8.6.2.5 states:

8.6.2.5 Transitions between buildings with different heights will be achieved by providing an appropriate change in height and massing. This will be done using methods that may include setbacks, the stepping down of buildings, angular planes, separation distances and other means in accordance with Council-approved plans and design guidelines.

Policy 8.2.9.c) states that the City’s vision will be supported by site development that demonstrates context sensitivity and transition, while Policy 8.6.2.5 which states that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane, separation distances and other means. We understand what the City wants to achieve, however maintain that this policy should be interpreted as flexible and not determinative. It sets a precedent for the underutilization of sites at a time when there is a need to provide housing. Further this creates ambiguity for interpretation by various City staff/reviewers when trying to navigate the meaning of “*appropriate change*”. The policy as drafted suggests that there are various ways and tools available to ensure an appropriate transition is provided so we question the

enforceability of this policy and generally, the evaluative criteria to determine what an ‘appropriate’ transition is.

Embedding policy requirements to a largely qualitative urban design measure/tool is counterintuitive to smart growth and intensification strategies and does not provide a contextually appropriate response that acknowledges the City’s hierarchy and heights range and the unique nature of some of the City’s existing and transitioning sites within Neighbourhoods, as well as overall Neighbourhoods. Adding a policy element to urban design matters (previously subject to guidelines) will restrict development and efficient, high-quality built forms in the midst of a Provincial housing crisis.

Policy 8.6.1 speaks to Buildings and Building types and includes the following for Mid Rise buildings:

*“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 be designed to consider the width of the street right-of-way onto which they front**, and they must ensure appropriate transition to the surrounding context”*

While we acknowledge that between the previous draft Official Plan released in February 2024 and the current iteration, the definition of a mid-rise building has been improved, we remain concerned. The requirement that a mid-rise building consider the width of the street Right-of-Way onto which it fronts remains restrictive, is ambiguous and may be misinterpreted to restrict development in appropriate locations based on area or site-specific context. We request that the policy definition of a mid-rise building be modified to provide as much flexibility as possible which could involve the removal of reference to the right of way widths. Again, this policy references “appropriate transition” which could be problematic and subjective in its interpretation and application.

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 an ever changing market landscape being pulled by forces of economies, demand, and regulations.

We also find the following policy problematic:

8.6.2.11 Development proposals will demonstrate compatibility and integration with surrounding land uses and the public realm by ensuring that adequate privacy, sunlight and sky views are maintained and that microclimatic conditions are mitigated.

Policy 8.6.2.11 raises concerns because it is not clear what “compatibility” means and is unnecessarily restrictive in the newly revised definition in the MOP glossary. 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. This term should revert back to the previous definition as it better explains the reality of introducing new development into an existing context.

Beyond the definition, if a proponent is able to prove through technical analysis that compatibility is generally achieved with or without mitigation measures, the development proposal achieves compatibility.

We question whether the City shares this opinion or if the development application process is under the assumption that compatibility could be subjective and therefore harder or if not impossible to achieve in certain circumstances.

Chapter 14, Growth Nodes

Previous correspondence raised concerns regarding “corridor” policies, and specifically 14.1.1.4.c amongst others. We still note the policies should recognize the value of all main streets in Neighbourhoods, particularly in the right context that offer opportunities to provide much needed housing through intensification. City staff should reconsider whether the Rathwood area should have further details considering it currently has a policy referring to noise walls and instead should focus on where there are opportunities to create improved streetscapes with visually or functionally interactive uses such as residential buildings close to the street. The draft MOP is clearly trying to encourage an enhanced pedestrian realm as noted under policy 15.15.2.1 which compliments the need for enhanced policies regarding “corridor” development.

Chapter 15, Neighbourhoods

We also cite this policy in relation to the Neighbourhood policies which are found in Chapter 15 of the Draft MOP which cite ‘compatibility’ as a determinative or evaluative criteria for development, or intensification, within Neighbourhoods:

15.1.1.6 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.

Similarly, the reference to “appropriate transition” appears again in Chapter 15:

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

We encourage the City to remain open-minded in their application of the Urban Design tools and guidelines available to them through the development review process to facilitate productive discussions with proponents in order to determine on a contextually appropriate or area specific basis, what development is appropriate. This needs to be considered in light of policy 15.1.1.8 which suggests arterials are the appropriate location for new development. The policy tone, with references to “may” or “will”, needs to balance the needs of the importance of potential intensification with policies speaking to an appropriate fit in a Neighbourhood context. For example, the amount of complexity, and potentially competing site and building programming interests with new development as exemplified in policy 15.1.3.5 are an example of too much urban design direction forming in policy layers. We are encouraged to see policy 15.1.1.10 which suggests transit-supportive uses along major roads and that additional height/densities may be considered. However, this policy also indicates that this will only be done through a Local area (plan) review whereas City staff should take the opportunity now to explore which sites could accommodate the development envisioned through policy 15.1.1.10.

In previous correspondence, concerns were raised regarding policy 10.2.5.10 and in reply, the City note they would reword the policy. It does not appear to have been modified in the recently released draft of the MOP. While the policy modification is welcome, it is still troubling that staff have added so much detail when the existing City OP policy 16.1.2.4 appeared adequate and was relied upon by staff to evaluate applications. Also, if policy 10.2.5.10 is being considered for review, we believe policy 15.1.3.3 should

also be revised as it has similar references to “...*not exceed the height of any existing buildings on the property.....*” A current evaluation of what is appropriate development should not be hampered by what is likely an older policy planning regime, different economics, and building/site programming priorities in contrast to today’s need to meet the housing crisis here in Mississauga.

In order to align and implement the Mayor’s Housing Task Force report and Council resolution responding to the objectives of building more housing, we respectfully request that the matters raised above for policy revisions or removal will be considered as we are concerned the MOP has introduced barriers to developments reaching final/design implementation stages.

Thank you for the opportunity to provide comments on the City’s Official Plan Review. We would be happy to discuss and review in meetings or by phone our comments with staff, if necessary.

Sincerely,

GLEN SCHNARR & ASSOCIATES INC.



Maurice Luchich, MCIP RPP

Senior Associate

c: Forest Park Circle Apartments