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June 16, 2025

**VIA ENVIRONMENTAL REGISTRY OF ONTARIO**

Hon. Rob Flack, MPP, Minister  
Ministry of Municipal Affairs and Housing  
Municipal Services Office – Central Region  
777 Bay Street, 16<sup>th</sup> Floor  
Toronto, ON M7A 2J3

**Attention: Jennifer Le, Senior Planner**

Dear Minister Flack:

**RE: City of Mississauga Official Plan, 2051 - By-law No. 0069-2025  
2125 and 2145 North Sheridan Way, Mississauga  
ERO Number: 025-0468  
\*\* Request for Notice of Decision \*\***

We are the lawyers for the below noted registered owners of the properties municipally known as 2125 North Sheridan Way and 2145 North Sheridan Way (the “**Owners**”) and for Easton’s Group of Hotels Inc., who is the agent for the Owners:

2125 North Sheridan Way -- 2125 NS Mississauga GP Limited, 2125 NS  
Mississauga LP, Dixon Toronto Airport Holdings  
Inc., 2125 North Sheridan Limited Partnership and  
2125 North Sheridan Hospitality Inc.

2145 North Sheridan Way -- 2145 North Sheridan Hospitality Inc.

(together, the “**North Sheridan Lands**”)

On April 24, 2025, we received notice from the City of Mississauga (the “**City**”) that the new Mississauga Official Plan, 2051 (the “**New Official Plan 2051**”) was adopted by City Council on April 16, 2025, and has been forwarded to the Minister of Municipal Affairs and Housing (the “**Minister**”) for approval in accordance with the *Planning Act*, R.S.O. 1990, c. P. 13, as amended.

On behalf of the Owners, we are writing to provide our comments and to request modifications to the City’s new Official Plan 2051.

## BACKGROUND

On February 19, 2025, the Owners appealed City Council's adoption of Official Plan Amendment No. 182 ("**OPA 182**"). At a high level, OPA 182 proposed revisions to the City's current Official Plan and the Region of Peel Official Plan (the "**Region OP**") for lands identified in the Region OP as *Employment Areas* in response to the legislative changes to the *Planning Act* under Bill 97, and the policy changes introduced under the Provincial Planning Statement 2024 for "areas of employment" (the "**Appeals**").

Extensive, collaborative discussions between our clients and City Staff culminated in a settlement offer that was accepted by City Council on February 26, 2025, and which modified OPA 182 and removed the North Sheridan Lands from the *Employment Area* delineated on Schedule E-4 of the Region OP. On March 24, 2025, the Ontario Land Tribunal issued a decision allowing the Appeals in part and approving OPA 182, as modified by the settlement reached between the parties. A copy of the Tribunal's decision appending OPA 182 as modified is enclosed as **Appendix "A"** (the "**OLT Decision**").

As a result of these modifications, the North Sheridan Lands are not within an "area of employment" or *Employment Area* as defined in Section 1(1) of the *Planning Act*, the PPS 2024, the Region's Official Plan, and the City's in-force Official Plan, respectively.

Prior to adoption of the New Official Plan 2051, our clients continued to engage in direct discussions with City Staff with respect to the treatment of the North Sheridan Lands in the New Official Plan 2051. Specifically, these discussions were centered around three key principles:

- (1) Ensuring that the North Sheridan Lands were removed from the *Employment Areas* mapping contained in the New Official Plan 2051, consistent with the OLT Decision for OPA 182;
- (2) Providing for the re-designation of the North Sheridan Lands from *Business Employment* to *Mixed Use*; and,
- (3) That the North Sheridan Lands are placed into the adjacent *Sheridan Growth Node* as an appropriate, alternative *Urban Structure* overlay on Schedule 1 of the New Official Plan 2051.

Additionally, our clients raised concerns regarding the legality of the affordable housing provisions in Chapter 14 of the New Official Plan 2051, which purport to mandate affordable housing requirements without complying with the legislative requirements that apply to inclusionary zoning under the *Planning Act*.

Further to our clients' discussions with City Staff, we provided written comments to City Council with respect to the above noted principles and requested revisions to the New Official Plan 2051. Please find a copy of our written submissions to City Council dated April 1, 2025 and April 15, 2025, enclosed as **Appendix "B"** ("**Letters to Council**").

While the North Sheridan Lands have been removed from the City's *Employment Areas*, the remainder of the above noted requested revisions have not been reflected in the New Official Plan 2051 adopted by City Council.

## REQUEST FOR MODIFICATIONS

For the purposes of this submission, we are writing to request the following revisions to the New OP 2051, as further outlined in our Letters to Council:

- (1) **Schedule 1** – Schedule 1 (City Structure) proposes to place the North Sheridan Lands in the *Neighbourhood (NHD)* overlay. The proposed overlay is inconsistent with the existing commercial uses on the North Sheridan lands, which are comprised of hotel uses. It is unclear why the proposed *Neighbourhood* overlay was advanced. We submit that it would be more appropriate to include the lands within the *Sheridan Growth Node (GN)* overlay.

As a result of this requested change to Schedule 1, we note that similar revisions to the following maps contained in the New Official Plan 2051 will also be required:

- (i) Section 3.3, City Structure, Map 3-1: *Strategic Growth Areas*;
  - (ii) Section 14.1, Introduction, Map 14-1: Growth Nodes;
  - (iii) Section 14.2.10, Sheridan, Map 14-2.10: Sheridan Growth Node Character Area; and
  - (iv) Section 15.1, Introduction, Map 15-1: Neighbourhood Character Area.
- (2) **Schedule 7** – The North Sheridan Lands are currently designated *Business Employment* under the New Official Plan 2051, which applies to all other lands within the *Sheridan Park Corporate Centre Employment Area*. The City has chosen to carry this designation forward despite the removal of the North Sheridan Lands from the City's *Employment Areas*. We submit that a *Mixed Use* designation should be applied to the North Sheridan Lands to allow for the ongoing operation of the existing hotel uses and to facilitate future opportunities for the North Sheridan Lands to evolve and redevelop.

The New Official Plan 2051 also contains a Special Site Policy 188 (Sheridan Park Neighbourhood) that applies to the North Sheridan Lands. As a result of the above noted requested revisions, Special Site Policy 188 should be removed to recognize the inclusion of the North Sheridan Lands in the *Sheridan Growth Node* overlay.

- (3) **Chapter 14 (Growth Nodes)** – Policy 14.2.10.5.1 of the New Official Plan 2051 purports to require a minimum of 10 percent of housing units be provided below market value for each development application proposing more than 50 residential units for lands within the *Sheridan Growth Node*. This policy purports to apply despite the *Sheridan Growth Node* not being located within a Protected Major Transit Station Area or a development permit system area. Similar policies are contained in Section 14.1 of the New Official Plan 2051 adopted by City Council for other delineated *Growth Nodes*.

We submit that the proposed affordable housing policies should either be removed or substantively modified to “encourage”, rather than purport to “require”, the provision of affordable housing in the *Sheridan Growth Node* and other *Growth Nodes* where the legislative requirements for enforcing such policies have not been met.

We appreciate your consideration of this matter. Please provide notice of any decisions in this matter to the undersigned and Daniel Artenosi ([dartenosi@overlandllp.ca](mailto:dartenosi@overlandllp.ca)) and/or by regular mail to the address noted herein.

Yours truly,  
**Overland LLP**

  
Per: Justine Reyes  
Associate

Encl.

cc. D. Artenosi, Overland LLP

**APPENDIX "A"**

Ontario Land Tribunal Decision dated March 24, 2025

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



**ISSUE DATE:** March 24, 2025

**CASE NO(S):**

OLT-24-001135

**PROCEEDING COMMENCED UNDER** subsection 17(24) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Appellant: 2125 NS Mississauga GP Limited, 2125 NS Mississauga LP, Dixon Toronto Airport Holdings Inc., 2125 North Sheridan Limited Partnership and 2125 North Sheridan Hospitality Inc.  
Appellant: 2145 North Sheridan Hospitality Inc.  
Appellant: 6257 Airport Toronto Hospitality Inc.  
Subject: Proposed Official Plan Amendment No. 182  
Description: To permit an update to the Mississauga Official Plan to align with the new definition of "area of employment" in the Planning Act and the Provincial Planning Statement  
Reference Number: OPA 182 LA.07-PRO  
Property Address: City-Wide  
Municipality/UT: Mississauga/Peel  
OLT Case No.: OLT-24-001135  
OLT Lead Case No.: OLT-24-001135  
OLT Case Name: 2125 NS Mississauga GP Limited et al. v. Mississauga (City)

**Heard:** March 19, 2025 by video hearing

**APPEARANCES:**

**Parties**

**Counsel**

City of Mississauga ("City")

B. Luo  
L. Magi

2125 NS Mississauga GP Limited  
2125 NS Mississauga LP  
2125 North Sheridan Limited Partnership

D. Artenosi  
J. Reyes

2125 North Sheridan Hospitality Inc.  
Dixon Toronto Airport Holdings Inc.  
2145 North Sheridan Hospitality Inc.  
6257 Airport Toronto Hospitality Inc.  
("Appellants")

**MEMORANDUM OF ORAL DECISION DELIVERED BY S. TOUSAW ON MARCH 19,  
2025 AND ORDER OF THE TRIBUNAL**

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[Link to Order](#)

[1] This Decision implements a settlement reached by the Parties related to land use policies that affect three hotels.

[2] The City had adopted Official Plan Amendment 182 ("OPA 182") to update the Region of Peel Official Plan ("ROP") (for which the City is now responsible within its boundaries) and to update the City Official Plan ("COP") to align the definition of Employment Areas with the definition of "area of employment" contained in the *Planning Act* ("Act") and the Provincial Planning Statement, 2024 ("PPS") as of October 20, 2024. An "area of employment" is more narrowly defined and does not permit a hotel (among other uses).

[3] The Appellants (i.e., groupings thereof) own operating hotels on each of three properties: 2125 North Sheridan Way ("2125"); 2145 North Sheridan Way ("2145"); and 6257 Airport Road ("6257"). 2125 and 2145 are in the southern area of the City along the Queen Elizabeth Way, and 6257 is across Airport Road from Pearson International Airport.

[4] The Tribunal qualified Christian Binette, Planner with the City, to provide opinion evidence in land use planning. On the affirmed and uncontested Affidavit by Mr. Binette, the Tribunal finds as follows.

[5] The proposed modification to OPA 182 to remove 2125 and 2145 from the

Employment Area is warranted, given: their location at the periphery of the Sheridan Park Corporate Centre; the acceptable co-existence of these two hotels with adjacent residential and employment uses; and the opportunity for these sites, adjacent to an Employment Area, to be used for other uses supportive of an Employment Area.

[6] The Tribunal finds that OPA 182, with the requested modification, has regard for s. 2 of the Act; is consistent with the PPS; aligns with the purpose and intent of the ROP and COP; and constitutes good planning in the public interest.

[7] The Parties' settlement retains 6257 within the Employment Area surrounding the Pearson International Airport. Following the Tribunal's oral Order at the Hearing, 6257 Airport Toronto Hospitality Inc. withdrew its appeal by letter to the Tribunal dated March 19, 2025.

[8] The Parties are congratulated on achieving a settlement that constitutes good planning.

## ORDER

[9] **THE TRIBUNAL ORDERS** that the appeals are allowed, in part, and Official Plan Amendment 182 is modified as contained in **Attachment 1**, and approved as modified.

*"S. Tousaw"*

S. TOUSAW  
VICE-CHAIR

**Ontario Land Tribunal**

Website: [www.olt.gov.on.ca](http://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.

## ATTACHMENT 1

**Note: The proposed modifications are bordered and marked in red.**

## MISSISSAUGA OFFICIAL PLAN AMENDMENT NO. 182 MODIFICATIONS

1. Section 5.8, Employment Areas, of Region of Peel Official Plan, is hereby amended by adding policies 5.8.17, 5.8.18 and 5.8.19 and renumbering existing policies accordingly as follows:

5.8.17 *Employment Areas* include Corporate Centres and Employment Areas in Mississauga Official Plan to the extent that lands in these areas are shown on Schedule E-4.

5.8.18 Lands described in Policy 5.8.17 are *Employment Areas* even if they include one or more parcels of land that are subject to Mississauga Official Plan policies authorizing the continuation of a use that is excluded from the definition of *Employment Area*, provided that the use was lawfully established on the parcel of land before October 20, 2024.

5.8.19 Notwithstanding policies 5.8.17, 5.8.18 and Schedule E-4, the lands located at 2125 and 2145 North Sheridan Way in the City of Mississauga are not part of an *Employment Area*.

2. Glossary, of Region of Peel Official Plan, is hereby amended by deleting and replacing the term "Employment Area" as follows:

*Employment Area*: an area of land designated in this Plan for clusters of business and economic uses, those being uses that meet the following criteria:

1. The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:
  - a. manufacturing;
  - b. research and development in connection with manufacturing anything;
  - c. warehousing and goods movement;
  - d. retail and office associated with uses set out in a. to c. above;
  - e. facilities that are ancillary to uses set out in a. to d. above; and
  - f. any other prescribed business and economic uses under the *Planning Act*.
2. The uses are not any of the following uses:

- a. institutional uses; and
  - b. commercial uses, including retail and office uses not referred to in subparagraph 1d.
3. Section 15.1.1, General, Corporate Centres, of Mississauga Official Plan, is hereby amended by adding policy 15.1.1.5 as follows:
- 15.1.1.5 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.
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.
5. Chapter 20, Glossary, of Mississauga Official Plan, is hereby amended by adding a term for "Area of Employment" as follows:

## AREA OF EMPLOYMENT

means an area of land designated in the Region of Peel Official Plan as Employment Area for clusters of business and economic uses, those being uses that meet the following criteria:

1. The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:
  - a. manufacturing;
  - b. research and development in connection with manufacturing anything;
  - c. warehousing and goods movement;
  - d. retail and office associated with uses set out in a. to c. above;
  - e. facilities that are ancillary to uses set out in a. to d. above; and
  - f. any other prescribed business and economic uses under the *Planning Act*.
2. The uses are not any of the following uses:
  - a. institutional uses; and
  - b. commercial uses, including retail and office uses not referred to in subparagraph 1d.

**IMPLEMENTATION**

Upon receipt of the Ontario Land Tribunal's Final Order, Mississauga Official Plan and Region of Peel Official Plan, as applicable to the City, will be amended in accordance with this Amendment, subject to Tribunal modifications.

This Amendment has been prepared based on the Office Consolidation of Mississauga Official Plan dated August 7, 2024 and the Region of Peel Official Plan approved by the Official Plan Adjustments Act, 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.

**APPENDIX "B"**

Letters of Concern sent to Mississauga City Council, dated April 1, 2025 and April 15, 2025

**Justine Reyes**  
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Direct 416-730-8377  
Cell 437-424-3244  
jreyes@overlandllp.ca

**Overland LLP**  
5255 Yonge St, Suite 1101  
Toronto, ON M2N 6P4  
Tel 416-730-0337  
overlandllp.ca



April 15, 2025

**VIA E-MAIL**

Mayor Carolyn Parrish and Members of Council  
City of Mississauga  
300 City Centre Drive, 6<sup>th</sup> Floor  
Mississauga, ON L5B 3C1

**Attention: Stephanie Smith, Supervisor, Secretariat**

Your Worship and Members of Council:

**RE: Comments on Item 17.11 - New City of Mississauga Official Plan 2051  
2125 North Sheridan Way and 2145 North Sheridan Way**

We are the lawyers for the below noted registered owners of the properties municipally known as 2125 North Sheridan Way and 2145 North Sheridan Way (the “**Owners**”) and for Easton’s Group of Hotels Inc., who is the agent for the Owners:

2125 North Sheridan Way -- 2125 NS Mississauga GP Limited, 2125 NS Mississauga LP, Dixon Toronto Airport Holdings Inc., 2125 North Sheridan Limited Partnership and 2125 North Sheridan Hospitality Inc.

2145 North Sheridan Way -- 2145 North Sheridan Hospitality Inc.

(together, the “**North Sheridan Lands**”)

We have reviewed the updated draft of the new Mississauga Official Plan 2051 (the “**Draft Mississauga OP**”), for which a By-law is being introduced for adoption at City Council’s meeting on April 16, 2025.

We write on behalf of the Owners to provide our further comments with respect to the updated Draft Mississauga OP and to request that City Council defer its consideration of the Draft Mississauga OP and refer the matter back to City Staff to address the numerous comments that have been submitted by affected landowners and other stakeholders, including the Owners.

**BACKGROUND**

By letter to City Council dated April 1, 2025, we outlined our preliminary comments and concerns with the Draft Mississauga OP on behalf of the Owners (the “**Letter of Concern**”). The Letter of Concern included, among other things, our comments with respect to the treatment of the North Sheridan Lands in the then proposed Draft Mississauga OP in light of their removal from the City’s *Employment Areas* in accordance with the settlement reached between the Owners and the City

through the appeals of Mississauga Official Plan Amendment No. 182. A copy of the Letter of Concern is enclosed as **Attachment “A”**.

Our client’s land use planning consultant, Malone Given Parsons, thereafter attended a meeting with City Staff to discuss and address the concerns and requested modifications to the Draft Mississauga OP as set out in the Letter of Concern. Despite these efforts, many of the matters raised in the Letter of Concern and discussed with City Staff directly have not been addressed in the updated Draft Mississauga OP.

### **Revisions to City Structure**

While we are pleased to see revisions to the Draft Mississauga OP that implement the removal of the North Sheridan Lands from the *Sheridan Park Corporate Centre Employment Area*, we are concerned with their proposed inclusion in the *Sheridan Neighbourhood (NHD) Character Area* overlay Schedule 1 (Urban Structure). As a general proposition, the Draft Mississauga OP proposes to limit the range of land uses and the scale of intensification permitted within a *Neighbourhood*, including as it relates to permitted height and density.

Policy 15.1.1.3 of Draft Mississauga OP proposes to limit the maximum permitted building height to four storeys within a *Neighbourhood* for lands that are not subject to a Residential Land Use Designation unless Character Area policies specify alternative requirements, or until such time as alternative building heights are determined through the review of Character Area policies.

Policy 15.1.6.1 of the Draft Mississauga OP provides that the *Business Employment* land use designation will not be permitted, except for land designated *Business Employment* at the time the Draft Mississauga OP comes into effect.

As noted in the Letter of Concern, the North Sheridan Lands are designated *Business Employment* under the in-force Mississauga Official Plan (August 2024 Office Consolidation) and are currently occupied by multi-storey hotel uses in two separate hotel buildings, which exceed the general built-form permitted within a *Neighbourhood*.

The existing *Business Employment* land use designation (which the Draft Mississauga OP continues to propose carrying forward), the existing hotel use, and the heights of the existing hotels on the North Sheridan Lands are not in keeping with the general planned framework envisioned for the *Neighbourhood* areas. In order to reconcile the disconnect between the general planning framework envisioned for the *Sheridan Neighbourhood* and the existing built-form and uses on the North Sheridan Lands, the updated Draft Mississauga OP proposes to include a new Special Site 188 policy that would apply to the North Sheridan Lands as follows (the “**SASP**”):

... 17.188.2 *Notwithstanding the Neighbourhood Character Area policies of this Plan, the maximum height permitted is as set out in the Zoning By-law for this Site.*

17.188.3 *Notwithstanding the Character Area policies of this Plan the following uses will also be permitted:*

a. *overnight accommodation;*

b. major office; and

c. post-secondary educational facility. [Emphasis added.]

On a preliminary basis, there are three obvious issues raised by the updated Draft Mississauga OP as it pertains to the North Sheridan Lands as follows:

1. Despite the opportunity to undertake a qualitative review of the North Sheridan Lands and include said Lands within a component of the proposed Urban Structure where the existing built-form and land use are permitted and in turn contemplated, the current Draft Mississauga OP includes the Lands within a component of the Urban Structure (*Neighbourhood*) where the existing built-form and land use do not conform with development envisioned therein. The decision to include the North Sheridan Lands within the Sheridan Neighbourhood appears to have been made arbitrarily, without any policy rationale to justify this proposed direction.
2. While the proposed SASP seeks to recognize the existing built-form and land use on the North Sheridan Lands, by limiting the maximum permitted height to the height permitted under the in-force zoning by-law, the proposed SASP will effectively require the owner to obtain an official plan amendment if future additions (height) are proposed on the Lands, despite the fact that the in-force zoning permissions were approved well before the current provincial policy framework promoting intensification and optimization of land use and infrastructure were approved by the Province.
3. The inclusion of the North Sheridan Lands within the *Sheridan Neighbourhood* fails to account for the Lands redevelopment potential, given their size and location. The North Sheridan Lands are immediately adjacent to the *Sheridan Growth Node*, and they are an obvious location for modest expansion to the existing boundary. The inclusion of the North Sheridan Lands within the *Sheridan Growth Node*, coupled with our clients' request that the underlying land use be revised to *Mixed Use* designation, would fully permit the existing built-form and land use, and would further provide policy direction to guide the potential future redevelopment of the North Sheridan Lands in a manner consistent with the Provincial Planning Statement (2024). The failure to recognize the redevelopment potential of the North Sheridan Lands in the City's proposed growth management structure directly undermines provincial policy direction that seeks to promote the optimization of land use and existing and planned infrastructure.

Based on the background Staff Reports, it would appear that City Staff has not undertaken a meaningful review of *Growth Node* boundaries, including the *Sheridan Growth Node*. As advised, this understanding was confirmed by City Staff at a meeting with our client's land use planning consultants. We submit that the failure to consider modifications to *Growth Node* boundaries fails to implement key growth management policies in the Provincial Planning Statement (2024), which raises critical flaws with the process undertaken by the City in support of the current Draft Mississauga OP. These critical deficiencies with the City's general approach are compounded by

the failure to respond to an obvious opportunity to expand the Sheridan Growth Node to include the North Sheridan Lands, based on the reasons set out above, including the recent removal of the Lands from the Sheridan Park Corporate Centre Employment Area. We submit that this critical error in implementing key growth management directives fails to meet the obligation of the City under Section 26 of the *Planning Act*.

### **Affordable Housing Policies**

Our clients are concerned by the continued inclusion of policies that would purport to require the provision of a minimum of 10 percent of housing units that are below market value for each development application proposing more than 50 residential units on lands within *Growth Node* Character Areas in the Draft Mississauga OP.

As set out in our Letter of Concern, these draft policies seek to mandate affordable housing without complying with the clear legislative requirements in the *Planning Act* that apply to a municipality's use of the inclusionary zoning tool. As a general proposition, affordable housing may only be required through the inclusionary zoning framework, which in turn requires that a municipality satisfy the legislative requirements set out in Sections 16(4) and 35.2 of the *Planning Act* and associated O. Reg. 232/18. The proposed affordable housing policies noted above have not been developed in accordance with these legislative requirements.

Of further note, inclusionary zoning is only applicable within a Protected Major Transit Station Area or a development permit system area. By way of example, the *Sheridan Growth Node* is not located in either of these planning areas, and yet the proposed affordable housing policies noted above would purport to require the provision of affordable housing for new developments including more than 50 residential units within this Area.

We submit that the proposed affordable housing policies should either be removed, or substantively modified to "encourage", rather than purport to require, the provision of affordable housing.

### **REQUEST FOR DEFERRAL**

We understand that other interested persons have also raised a number of concerns and have requested that this matter be referred back to Staff for review before City Council moves forward to consider adoption of the current Draft Mississauga OP.

Our clients support this direction and similarly request that City Council defer its consideration of the Draft Mississauga OP and refer the matter back to Staff to address the comments set out above.

Should you have any questions or require further information regarding this correspondence, please contact the undersigned and Daniel Arsenosi ([darsenosi@overlandllp.ca](mailto:darsenosi@overlandllp.ca)).

Yours truly,  
**Overland LLP**

*Justine Reyes*  
Per: Justine Reyes  
Associate

Encl.

cc. *L. Magi and B. Luo, solicitors for the City of Mississauga*

**ATTACHMENT "A"**

**Letter from Overland LLP dated April 1, 2025**

**Justine Reyes**  
Associate  
Direct 416-730-8377  
Cell 437-424-3244  
jreyes@overlandllp.ca

**Overland LLP**  
5255 Yonge St, Suite 1101  
Toronto, ON M2N 6P4  
Tel 416-730-0337  
overlandllp.ca



April 1, 2025

**VIA E-MAIL**

Mayor Carolyn Parrish and Members of Council  
City of Mississauga  
300 City Centre Drive, 6<sup>th</sup> Floor  
Mississauga, ON L5B 3C1

**Attention: Heleana Tsabros, Legislative Coordinator**

Your Worship and Members of Council:

**RE: Comments on Item 6.5 - New City of Mississauga Official Plan 2051  
2125 North Sheridan Way and 2145 North Sheridan Way**

We are the lawyers for the below noted registered owners of the properties municipally known as 2125 North Sheridan Way and 2145 North Sheridan Way (the “**Owners**”) and for Easton’s Group of Hotels Inc., who is the agent for the Owners:

2125 North Sheridan Way -- 2125 NS Mississauga GP Limited, 2125 NS Mississauga LP, Dixon Toronto Airport Holdings Inc., 2125 North Sheridan Limited Partnership and 2125 North Sheridan Hospitality Inc.

2145 North Sheridan Way -- 2145 North Sheridan Hospitality Inc.

(together, the “**North Sheridan Lands**”)

The North Sheridan Lands are located on the northwest corner of the intersection of North Sheridan Way and Leanna Boulevard and are bounded by Queen Elizabeth Way (QEW) highway to the south. The North Sheridan Lands are designated *Business Employment* under the in-force Mississauga Official Plan (August 2024 Office Consolidation) and are currently occupied by hotel uses in two separate hotel buildings.

We have reviewed the draft of the new City of Mississauga Official Plan 2051 (the “**Draft Mississauga OP**”), which was presented to the City’s Development and Planning Committee on March 24, 2025.

On behalf of the Owners, we are writing to provide our preliminary comments on the Draft Mississauga OP and to request that it be modified as it pertains to the North Sheridan Lands in accordance with the comments below prior to adoption by City Council.

## BACKGROUND

On February 19, 2025, the Owners appealed City Council's adoption of Official Plan Amendment No. 182 ("**OPA 182**"). At a high level, OPA 182 proposed revisions to the City's current Official Plan and the Region of Peel Official Plan (the "**Region OP**") for lands identified in the Region OP as *Employment Areas*, in response to the legislative changes to the *Planning Act* under Bill 97, and the policy changes introduced under the Provincial Planning Statement 2024 for "areas of employment" (the "**Appeals**").

The Appeals were the subject of collaborative discussions between our client and City Staff, which culminated in a settlement offer that was accepted by City Council on February 26, 2025, and which ultimately led to a modified OPA 182 being presented to the Ontario Land Tribunal (the "**Tribunal**") at a settlement hearing on March 19, 2025. In summary, the modifications to OPA 182 had the effect of removing the North Sheridan Lands from the *Employment Area* delineated on Schedule E-4 of the Region OP. On March 24, 2025, the Tribunal issued a decision allowing the Appeals in part and approving OPA 182, as modified by the settlement reached between the parties. A copy of the Tribunal's decision appending OPA 182 as modified is enclosed (the "**Tribunal's Decision**").

As a result of these modifications, the North Sheridan Lands are not within an "area of employment" or *Employment Area* as defined in Section 1(1) of the *Planning Act*, the PPS 2024, the Region's Official Plan, and the City's in-force Official Plan, respectively.

## REVISIONS TO DRAFT OFFICIAL PLAN POLICIES AND SCHEDULES

We note that the Draft Mississauga OP was released for public comment prior to the issuance of the Tribunal's Decision. It is our understanding that the sequencing of the Tribunal's Decision relative to Staff's release of the Draft Mississauga OP is the reason why the draft policies and schedules do not reflect the removal of the North Sheridan Lands from the delineated *Employment Areas*. The Draft Mississauga OP should now be modified to ensure consistency with the settlement reached in the OPA 182 Appeals prior to its approval by City Council. It is our understanding that City Staff is supportive of the necessary changes to the Draft Mississauga OP to reflect the North Sheridan Lands' removal from the *Employment Areas* overlay in the associated Schedules to the Draft Mississauga OP.

### Revisions to City Structure

Schedule 1 – City Structure of the Draft Mississauga OP currently identifies the North Sheridan Lands as being within the *Sheridan Park Corporate Centre Employment Area*. We submit that Schedule 1 should be revised to remove the North Sheridan Lands from the *Employment Area* and locate it within the adjacent *Sheridan Growth Node* to the east. The following draft mapping contained in the Draft Mississauga OP will also require revisions to implement the above noted changes to Schedule 1:

1. Section 3.3 City Structure, Map 3-1: Strategic Growth Areas;
2. Section 14.1 Introduction, Map 14-1: Growth Nodes;

3. Section 14.2.10 Sheridan, Map 14-2.10 Sheridan Growth Node Character Area;
4. Section 16.1 Introduction, Map 16-1: Employment Areas; and,
5. Section 16.15 Sheridan Park Corporate Centre, Map 16-12: Sheridan Park Corporate Centre Employment Area.

### **Revisions to Land Use Designations**

As noted above, the North Sheridan Lands are currently designated *Business Employment* under the City's in-force Official Plan. The *Business Employment* designation applies to all lands contained in the *Sheridan Park Corporate Centre Employment Area* as delineated under the City's in-force Official Plan. As drafted, the Draft Mississauga OP proposes to carry forward the *Business Employment* designation for the North Sheridan Lands on Schedule 7 – Land Use Designations despite their removal from an area of employment.

In light of the now approved OPA 182, we submit that the North Sheridan Lands should be designated *Mixed Use* on Schedule 7 of the Draft Mississauga OP. The *Mixed Use* designation is the only designation (outside of the existing *Business Employment* designation) within the Draft Mississauga OP that permits “overnight accommodation” as a permitted use. As such, the *Mixed Use* designation will allow for the continued operation of the existing hotel uses while providing an appropriate policy framework through the Sheridan Growth Node policies to facilitate future development opportunities for the North Sheridan Lands to evolve and redevelop. As such, we request that the City revise Schedule 7 – Land Use Designations of the Draft Mississauga OP to designate the North Sheridan Lands *Mixed Use*.

The Owners would be pleased to have their land use planning consultant, Malone Given Parsons Ltd., work with City Staff to incorporate the requested modifications into the Draft Mississauga OP prior to its submission to City Council for approval.

### **Additional Concerns**

We note that the draft policies for the *Sheridan Growth Node* purport to require the provision of a minimum 10 percent of housing units that are below-market for each development application proposing more than 50 residential units. As a general proposition, we submit that official plan policies that propose to implement inclusionary zoning requirements may only apply to lands within a Protected Major Transit Station Area or a development permit system area. The *Sheridan Growth Node* is not located in either of these planning areas and the Draft Mississauga OP should be modified to remove these proposed mandatory requirements for the provision of affordable housing.

### **REQUEST FOR NOTICE**

We thank the City for the opportunity to provide input on the Draft Mississauga OP and for your attention to this matter. Please provide us with written notice of any decision in respect of the Draft Mississauga OP and any further iterations thereof.

Should you have any questions or require further information regarding this correspondence, please contact the undersigned and Daniel Artenosi ([dartenosi@overlandllp.ca](mailto:dartenosi@overlandllp.ca)).

Yours truly,  
**Overland LLP**

*Justine Reyes*  
Per: Justine Reyes  
Associate

Encl.

cc. *L. Magi and B. Luo, solicitors for the City of Mississauga*

ATTACHMENT A

Decision of the Ontario Land Tribunal regarding OPA 182, dated March 24, 2025

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



**ISSUE DATE:** March 24, 2025

**CASE NO(S):**

OLT-24-001135

**PROCEEDING COMMENCED UNDER** subsection 17(24) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Appellant: 2125 NS Mississauga GP Limited, 2125 NS Mississauga LP, Dixon Toronto Airport Holdings Inc., 2125 North Sheridan Limited Partnership and 2125 North Sheridan Hospitality Inc.  
Appellant: 2145 North Sheridan Hospitality Inc.  
Appellant: 6257 Airport Toronto Hospitality Inc.  
Subject: Proposed Official Plan Amendment No. 182  
Description: To permit an update to the Mississauga Official Plan to align with the new definition of "area of employment" in the Planning Act and the Provincial Planning Statement  
Reference Number: OPA 182 LA.07-PRO  
Property Address: City-Wide  
Municipality/UT: Mississauga/Peel  
OLT Case No.: OLT-24-001135  
OLT Lead Case No.: OLT-24-001135  
OLT Case Name: 2125 NS Mississauga GP Limited et al. v. Mississauga (City)

**Heard:** March 19, 2025 by video hearing

**APPEARANCES:**

**Parties**

City of Mississauga ("City")

2125 NS Mississauga GP Limited  
2125 NS Mississauga LP  
2125 North Sheridan Limited Partnership

**Counsel**

B. Luo  
L. Magi

D. Artenosi  
J. Reyes

2125 North Sheridan Hospitality Inc.  
Dixon Toronto Airport Holdings Inc.  
2145 North Sheridan Hospitality Inc.  
6257 Airport Toronto Hospitality Inc.  
("Appellants")

**MEMORANDUM OF ORAL DECISION DELIVERED BY S. TOUSAW ON MARCH 19, 2025 AND ORDER OF THE TRIBUNAL**

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[Link to Order](#)

[1] This Decision implements a settlement reached by the Parties related to land use policies that affect three hotels.

[2] The City had adopted Official Plan Amendment 182 ("OPA 182") to update the Region of Peel Official Plan ("ROP") (for which the City is now responsible within its boundaries) and to update the City Official Plan ("COP") to align the definition of Employment Areas with the definition of "area of employment" contained in the *Planning Act* ("Act") and the Provincial Planning Statement, 2024 ("PPS") as of October 20, 2024. An "area of employment" is more narrowly defined and does not permit a hotel (among other uses).

[3] The Appellants (i.e., groupings thereof) own operating hotels on each of three properties: 2125 North Sheridan Way ("2125"); 2145 North Sheridan Way ("2145"); and 6257 Airport Road ("6257"). 2125 and 2145 are in the southern area of the City along the Queen Elizabeth Way, and 6257 is across Airport Road from Pearson International Airport.

[4] The Tribunal qualified Christian Binette, Planner with the City, to provide opinion evidence in land use planning. On the affirmed and uncontested Affidavit by Mr. Binette, the Tribunal finds as follows.

[5] The proposed modification to OPA 182 to remove 2125 and 2145 from the

Employment Area is warranted, given: their location at the periphery of the Sheridan Park Corporate Centre; the acceptable co-existence of these two hotels with adjacent residential and employment uses; and the opportunity for these sites, adjacent to an Employment Area, to be used for other uses supportive of an Employment Area.

[6] The Tribunal finds that OPA 182, with the requested modification, has regard for s. 2 of the Act; is consistent with the PPS; aligns with the purpose and intent of the ROP and COP; and constitutes good planning in the public interest.

[7] The Parties' settlement retains 6257 within the Employment Area surrounding the Pearson International Airport. Following the Tribunal's oral Order at the Hearing, 6257 Airport Toronto Hospitality Inc. withdrew its appeal by letter to the Tribunal dated March 19, 2025.

[8] The Parties are congratulated on achieving a settlement that constitutes good planning.

## ORDER

[9] **THE TRIBUNAL ORDERS** that the appeals are allowed, in part, and Official Plan Amendment 182 is modified as contained in **Attachment 1**, and approved as modified.

*"S. Tousaw"*

S. TOUSAW  
VICE-CHAIR

**Ontario Land Tribunal**

Website: [www.olt.gov.on.ca](http://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.

**ATTACHMENT 1**

**Note: The proposed modifications are bordered and marked in red.**

**MISSISSAUGA OFFICIAL PLAN AMENDMENT NO. 182 MODIFICATIONS**

1. Section 5.8, Employment Areas, of Region of Peel Official Plan, is hereby amended by adding policies 5.8.17, 5.8.18 and 5.8.19 and renumbering existing policies accordingly as follows:

5.8.17 *Employment Areas* include Corporate Centres and Employment Areas in Mississauga Official Plan to the extent that lands in these areas are shown on Schedule E-4.

5.8.18 Lands described in Policy 5.8.17 are *Employment Areas* even if they include one or more parcels of land that are subject to Mississauga Official Plan policies authorizing the continuation of a use that is excluded from the definition of *Employment Area*, provided that the use was lawfully established on the parcel of land before October 20, 2024.

5.8.19 Notwithstanding policies 5.8.17, 5.8.18 and Schedule E-4, the lands located at 2125 and 2145 North Sheridan Way in the City of Mississauga are not part of an *Employment Area*.

2. Glossary, of Region of Peel Official Plan, is hereby amended by deleting and replacing the term "Employment Area" as follows:

*Employment Area*: an area of land designated in this Plan for clusters of business and economic uses, those being uses that meet the following criteria:

1. The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:
  - a. manufacturing;
  - b. research and development in connection with manufacturing anything;
  - c. warehousing and goods movement;
  - d. retail and office associated with uses set out in a. to c. above;
  - e. facilities that are ancillary to uses set out in a. to d. above; and
  - f. any other prescribed business and economic uses under the *Planning Act*.
2. The uses are not any of the following uses:

- a. institutional uses; and
  - b. commercial uses, including retail and office uses not referred to in subparagraph 1d.
3. Section 15.1.1, General, Corporate Centres, of Mississauga Official Plan, is hereby amended by adding policy 15.1.1.5 as follows:

15.1.1.5 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.
  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.
  5. Chapter 20, Glossary, of Mississauga Official Plan, is hereby amended by adding a term for "Area of Employment" as follows:

## AREA OF EMPLOYMENT

means an area of land designated in the Region of Peel Official Plan as Employment Area for clusters of business and economic uses, those being uses that meet the following criteria:

1. The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:
  - a. manufacturing;
  - b. research and development in connection with manufacturing anything;
  - c. warehousing and goods movement;
  - d. retail and office associated with uses set out in a. to c. above;
  - e. facilities that are ancillary to uses set out in a. to d. above; and
  - f. any other prescribed business and economic uses under the *Planning Act*.
2. The uses are not any of the following uses:
  - a. institutional uses; and
  - b. commercial uses, including retail and office uses not referred to in subparagraph 1d.

**IMPLEMENTATION**

Upon receipt of the Ontario Land Tribunal's Final Order, Mississauga Official Plan and Region of Peel Official Plan, as applicable to the City, will be amended in accordance with this Amendment, subject to Tribunal modifications.

This Amendment has been prepared based on the Office Consolidation of Mississauga Official Plan dated August 7, 2024 and the Region of Peel Official Plan approved by the Official Plan Adjustments Act, 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.