

March 21, 2025

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

Attention: Heleana Tsabros, Legislative Coordinator (Heleana.tsabros@mississauga.ca)

**RE: Item 6.5 Public Meeting (All Wards) – Proposed Mississauga Official Plan 2051
– Recommendation Report for Adoption**

Dear Sirs/Mesdames,

Sajecki Planning Inc. is pleased to submit this letter on behalf of BGO (formerly BentallGreenOak) in relation to the City of Mississauga's draft Mississauga Official Plan 2051 (Draft MOP). We have been following the City's Official Plan Review process, submitting comments on Policy Bundle 3 in July 2023 and the consolidated draft of the Official Plan in June 2024. We congratulate Council and staff on nearing the end on the difficult but important task of creating a new Official Plan to help the City address planning challenges as Mississauga continues to grow.

BGO wishes to express its continued support for the City's efforts to enhance the diversity and mix of housing across Mississauga, particularly in established Neighborhoods. They would like to raise their concerns that the final Draft MOP still puts constraints on new development in light of being in the midst of a housing crisis and challenging market conditions. BGO would like to encourage the City to do everything it can to simplify planning approvals and allow homes to be delivered as quickly and economically as possible.

We recognize that significant strides have been made since the consolidated draft was released in February 2024 in response to comments received from the development community. However, we feel the final Draft MOP needs to go further to support the kind of housing the City of Mississauga is looking for.

Non-Residential Requirement/Replacement

- Policy 10.2.6.3 in the February 2024 draft stated that all non-residential floor space is to be maintained as part of redevelopment on lands designated Mixed Use.
- Policy 10.2.6.3 has been revised in the final draft to introduce a measure of flexibility. Redevelopment must provide the greater of either,
 - Retail and service commercial gross floor area on the ground floor of each proposed building (or the equivalent across the entire site), or
 - 45%/65% non-residential replacement, depending on the size of the site.
- This represents an improvement over the previous version of the policy. However, BGO, through their extensive experience in retail leasing and operations, views ground floor retail within residential buildings in Neighbourhoods as very difficult to lease and at risk

of chronic vacancy. The retail landscape has also shifted due to changing consumer shopping habits and the growth of e-commerce. As such, BGO is of the opinion that mall and plaza sites in Neighbourhoods should have minimal retail replacement requirements, allowing market-driven decisions on the appropriate amount of retail, which in turn allows a greater chance of success to deliver much-needed housing

We respectfully request the City consider further reductions in retail replacement/requirement policies to facilitate the redevelopment of underutilized commercial sites for an appropriate and market-supported mix of uses, consistent with Provincial direction in the in-effect Provincial Planning Statement 2024 (PPS 2024) to encourage such redevelopment.

Maximum FSI on Mixed Use Sites in Neighbourhoods (over 1 ha)

- Draft Policy 10.2.6.6 outlines requirements for Mixed Use sites within Neighbourhoods that are larger than 1 ha in size, including a maximum height of 8 storeys and a maximum floor space index (FSI) of 1.75.
- We commend the City for introducing additional height and density permissions where non-residential requirements/replacement apply (per Policy 10.2.6.3). However, having both maximum height and maximum density regulations limits the market's ability to deliver efficient buildings.
- Imposing a maximum floor space index may have the unintended consequence of impeding the realization of new housing, limiting the very kind of built form and intensity the City is looking for, exactly where it makes the most sense.
- We also note that plazas in Neighbourhoods are typically located at key locations along arterials and have deep lots that could support greater building heights without impacting surrounding lower-scale residential neighbourhoods.

We request the City consider removing maximum FSI provisions from the Official Plan and consider a broader range of heights on Mixed Use sites in Neighbourhoods to support context-appropriate intensification.

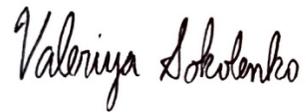
BGO supports the City's direction to focus growth to intensification areas and build new housing. However, we and BGO believe there are opportunities for appropriate intensification in underutilized neighbourhood necessity-based shopping centers, consistent with 2.2.1.b) 2. of the PPS 2024. We encourage the City to study the opportunity in these types of shopping centres similar to how larger retail malls were assessed in the Reimagining the Mall exercise.

It is our understanding that the City of Mississauga is exploring options for the Hazel McCallion LRT downtown loop, potentially extending the loop west to Confederation Parkway. Although this is independent from the Mississauga Official Plan Review process, we would like to take this opportunity to voice our support for the extension. Given recent development within Mississauga's Downtown Core, an extended downtown loop will bring rapid transit access to significantly more residents, workers, and visitors, helping Mississauga's core to continue to develop as a compact, livable, and complete community. We encourage the City to study additional PMTSAs for future stations along the loop extension, including neighbourhood plazas within the catchment areas of these PMTSAs.

On behalf of BGO, we thank you for the opportunity to provide our feedback on the draft Official Plan. We support the City's efforts toward building complete communities that leverage existing and planned infrastructure. Together, we hope to create opportunities for increased housing options, sustainable transportation modes, and placemaking.

If you have any questions, please do not hesitate to contact me at 416-448-2280 ext. 106 or valeriya@sajekiplanning.com.

Sincerely,



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