

July 11, 2025

GSAI File: 1348-001

*In Memoriam, Founding Partner:*  
**Glen Schnarr**

(Via Email)

Hon, Robert Flack  
Ministry of Municipal Affairs and Housing  
777 Bay Street  
Toronto, ON M7A 2J3

**RE: Mississauga Official Plan 2051  
Augend 189 Dundas West Village Properties Ltd.  
189 Dundas Street West & 3061 Parkerhill Road  
City of Mississauga  
ERO No.: ERO #0250465**

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Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Augend 189 Dundas West Village Properties Ltd. (the “Owner”) of the lands municipally known as 189 Dundas Street West, in the City of Mississauga. . On behalf of the Owner, we are pleased to submit this Comment Letter in relation to the Council adopted Mississauga Official Plan 2051, currently under review by the Ministry of Municipal Affairs and Housing (ERO No. 0250465, Ministry Reference # 21-OP-249936).

As background, GSAI participated in the Mississauga Official Plan Review initiative (‘OP Review initiative’) and the background OPA Studies which formed the basis for new MTSA policies in the Cooksville area under OPAs 145 and 146, which were incorporated into the new Draft OP. A copy of our written submission, dated January 21, 2022 is attached (See Attachment). In previous written submissions and Council deputations, comments were provided identifying areas of concern with the draft Mississauga Official Plan 2051 released for public review. The concerns raised were predominantly related to the City’s proposed City Structure, proposed PMTSAs, growth management framework, housing framework and application of a built form-based policy framework. Despite these concerns being raised to City Staff and Council members, these concerns were not addressed in the iteration of the Mississauga Official Plan 2051 adopted by Mississauga Council in April 2025.

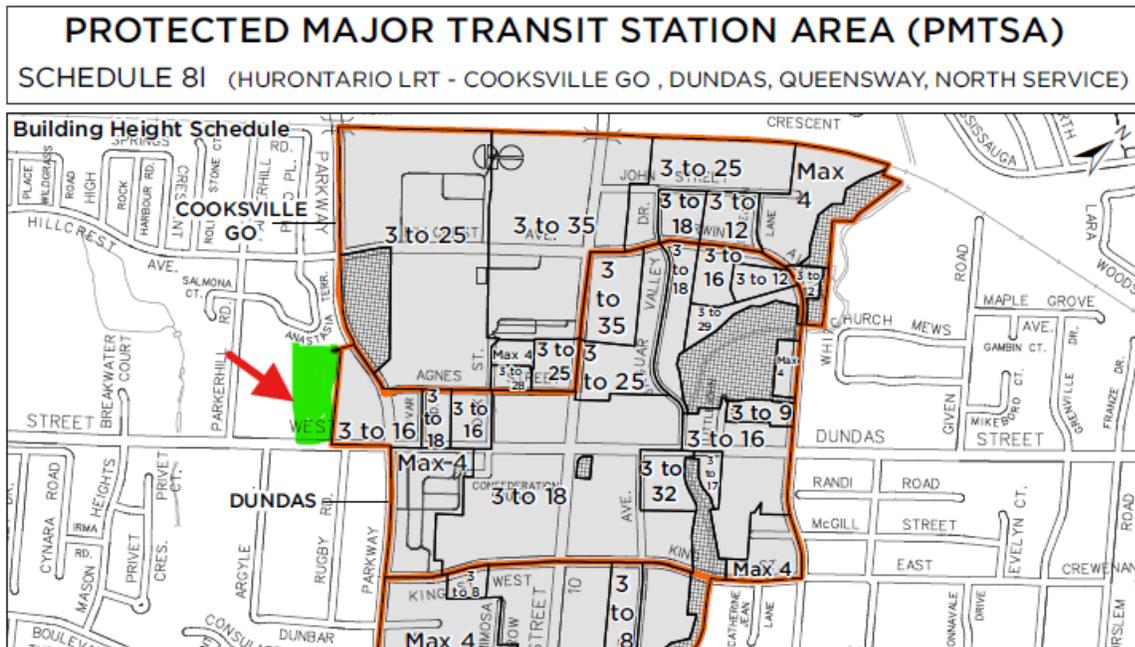
As the Ministry continues to review the Mississauga Official Plan 2051, we request that you consider making the following changes:

1. As depicted below, the subject lands abut the boundary of the Cooksville Growth Centre (purple) and fall within the Cooksville Neighbourhood West District (yellow). In the 2010 Mississauga OP and previous versions of the Official Plan leading up to then, the Cooksville Growth Centre was previously known as the Cooksville Community Node, which was one of several Community Nodes designated in previous OPs as either “transit based” or “mall based” Community Nodes. Despite several decades of new growth and redevelopment in Cooksville, the Node or Growth Centre boundaries remain unchanged under the new Draft OP. In the case of the 189 Dundas Street West lands, these lands are within 800 m direct distance to three forms of existing and proposed new transit infrastructure, namely the Cooksville GO Station, the new Mississauga LRT and the Dundas Street Bus Rapid Transit (BRT). Given their locational attributes and proximity and walkability to 3 forms of public transit, we believe Sections 13.1 and 13.2 of the new Draft OP should be amended such that the subject lands (in red) fall withing the Cooksville Growth Centre.



2. Section 11.3 of the Draft OP speaks to the creation of Protected Major Transit Station Areas (PMTSAs) along transit routes and other areas within the City. As depicted below, the subject lands (in green) abut the Cooksville Growth Centre which has two PMTSAs (Cooksville GO and Dundas) wherein heights of up to 35 storeys are permitted under the new Draft OP. The subject lands directly abut within the Confederation Parkway PMTSA and have a height limit of 25 storeys based on a recent mediated OLT settlement on an application which originally proposed maximum heights of 32 storeys. Both the new OP

and the provincial policy regime speak to the need to provide greater heights and densities within areas 500-800 m walk to transit. The subject lands at 189 Dundas West are approximately 620 m from the Cooksville GO station where it intersects with the new Mississauga LRT. In our opinion, there should not be transitional height limits for PMTSAs over several different PMTSAs within the Cooksville Growth Node. It would make better sense and demonstrate more consistency with the 2024 Provincial Planning Statement, in our opinion, to simply consolidate the different PMTSAs within 800 m of the Cooksville GO Station into one single PMTSA and allow a greater height threshold of up to 35 storeys within this 800 m circumference of the GO station. As is stands now, height limits vary depending on individual properties and efforts to transition height simply fail under the new Draft OP. It is our specific recommendation that PMTSA Schedules 8f and 8l be revised such that all properties within 800 m of the Cooksville GO station are allowed heights of up to 35 storeys.



3. Removal of Policy 4.2.2, Policy 4.2.3 and Policy 4.2.4 as they surpass what is required by the Ontario Building Code and conflict with the recent clarification provided by Bill 17 on the local municipality’s authority to require performance standards that go beyond the minimum requirements of the Building Code. Specifically with respect to Green Standards, the most recent directive from MMAH to municipalities clearly states that under Bill 17 municipalities do not have the authority to implement standards that exceed the requirements of the Building Code.

4. Deletion of onerous housing requirements under Policies 5.2.3, 5.2.4, and 14.2.1.5.1 that prescribe the number of family-sized units and affordable units in residential projects. If permitted, these policies will contrast Provincial and Ontario Land Tribunal Decisions and create inflexibility for housing projects to meet market demands, rendering them unviable.
5. Significant revisions to the built form-based policy framework under Policies 8.6.1, 8.2.9.c), 8.6.2.5 and 8.6.2.6. Together, these sections overly restrict the definition of building typologies and elevate urban design guidance to policy by enforcing that transition can be achieved through the use of setbacks, stepping down of buildings, angular plane applications, separation distances and other means which have the effect of reducing viable development.

Further explanation on why the aforementioned requests are being made are provided below for your consideration.

**Comments:**

We have reviewed the Mississauga Official Plan 2051, as adopted by Mississauga Council in April 2025, and have the following five (5) concerns. Our 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 this City Structure framework. We highlight that the Subject Lands continue to be identified as being located within the Cooksville West Neighbourhood Character Area. As described in the previous Comment Letters, we remain concerned about the City Structure as adopted and request that the Ministry modify the City Structure so that the Subject Lands are removed from the Cooksville West Neighbourhood Character Area and instead added to the Cooksville Growth Node. Inclusion of the Subject Lands within the Cooksville Growth Node is appropriate, would enable appropriate and compatible, mixed-use and transit-supportive development to occur, would further implement Provincial policy objectives of directing compact, mixed-use, transit-supportive and pedestrian-oriented development on lands within Built-Up Areas and on underutilized plaza sites, identified as a Strategic Growth Area in the Provincial Planning Statement (PPS) 2024, and would not comprise the overall City Structure.

Furthermore, Section 3.3.2 states that “Neighbourhoods typically accommodate the lowest densities and building heights”. Given the above-noted locational attributes of the Site, particularly

it being in proximity to transit services and located along a recognized Arterial and Transit Corridor, the continued inclusion of the Subject Lands within the Neighbourhood component of the City Structure is a significant missed opportunity and in our opinion, contrary to Provincial objectives which encourage higher density, compact, mixed-use development particularly in proximity to existing and planned transit services. Based on the above, in our opinion, the continued exclusion of the Subject Lands from the Cooksville Growth Node by City Staff and Council, despite multiple requests for the City Structure delineations to be reviewed, 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. Similarly and as stated above, a review of the multiple PMTSAs within and around the Cooksville GO Station is warranted. In our opinion and to be consistent with provincial policy, all lands within an 800 m circumference of the Cooksville GO Station and Hurontario LRT should have the same height threshold (35 storeys max) as is currently proposed only within the Cooksville GO PMTSA at specific locations. In our view there are suitably sized properties that share the same locational attributes given their proximity and walkability to public transit.

## **2. Sustainability**

Chapter 4, Sustaining the Natural Environment provides the refined policy framework for how lands and resources are to be managed. This includes policies which relate to how development is to respond to a changing climate. Of particular concern are Policy 4.2.2, Policy 4.2.3 and Policy 4.2.4 which state:

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

*'4.2.3. Mississauga will support efforts to protect against the impacts of the changing climate with adaptation measures that make the city more resilient to climate change impacts including extreme weather events.'*

*'4.2.4. Mississauga will build communities that are compact, low-carbon, mixed-use and transit-supportive. The City will promote renewable energy, energy conservation and efficient design. These initiatives will reduce greenhouse gases and help the city achieve its emission targets.'*

Collectively, the above-noted policies provide policy strength for sustainability initiatives and measures, such as the recently adopted City of Mississauga Green Development Standards. The policies as drafted are unnecessary and in practice, serve to encourage Staff to require onerous sustainability measures that endeavour to require development proponents to implement features

and technologies that are well above and beyond what is required by the Ontario Building Code. This practice is contrary to the authority granted municipalities by the Ontario Building Code Act and is contrary to the recent clarification provided by Bill 17. We request that the above-noted policies be removed so that the policy requirements are clear and a municipality's authority is not extended beyond what is permissible.

### **3. Housing**

Chapter 5 provides the refined City-wide housing policy framework. We are concerned with the housing policy framework as adopted. Of particular concern are Policies 5.2.3, 5.2.4, 14.2.1.5.1 which state:

*'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. additional needs 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.'*

*'5.2.4. The City will plan for an appropriate range and mix of housing options and densities that contributes to achieving the following housing targets:*

- 1. 30 percent of all new housing units are affordable housing (rental and ownership), of which 50 percent of all affordable housing units are encouraged to be affordable to low-income households. The majority of units affordable 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; and*
- 2. 25 percent of all new housing units are rental tenure. These rental units include private rental market and non-market units.'*

*'14.2.1.5.1. Residential development permitted by any land use designation will include:*

- a. A minimum 10 percent housing units that are below-market for each development application proposing more than 50 residential units. This will be comprised of units targeted for a range of middle income households. Approximately half of these units will be larger, family-sized dwellings containing more than one bedroom ....'*

The above-noted policies are concerning and require revision. With regard to Policy 5.2.3, the policy as adopted is overly restrictive. While the word "encouraged" is appreciated in the policy,

in practice, the policy has and will continue to be used to demand development proponents include a significant proportion of larger, family-sized units. The desire for 50% of all residential units to include 2-bedroom and 3-bedroom unit configurations will challenge the delivery of much needed housing units in appropriate location to satisfy Provincial policy objectives and local Housing Pledges, in the midst of a Provincial housing crisis. Furthermore, the policy objective of encouraging 50% of all new units to be family-sized is contrary to Provincial objectives which do not specify this and is also a significant departure from the objectives of neighbouring jurisdictions such as the City of Toronto, where 25% of units are encouraged to be larger family-sized units through the City of Toronto's Growing Up Urban Design Guidelines. We request that the Ministry remove Policy 5.2.3. Policy 5.2.4 is also concerning and should be removed or amended as it is not consistent with Bill 17 policies for affordable housing percentages within PMTSAs subject to Inclusionary Zoning which is capped at 5 percent. The proposed percentages in Policy 5.2.4 would effectively make projects financially infeasible.

#### ***4. Built Form & Transition***

Chapter 8 provides a refined built form and site development policy framework for lands across the City. More specifically, Chapter 8 and in fact policies throughout the Mississauga Official Plan 2051 have been developed as a transition to a built-form based policy framework. This relates in instances where policy is overly restrictive and instances where urban design guidance has been elevated to policy. We are concerned with this transition to a built form-based policy framework and highlight concerns with Policies 8.2.9.c), 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 Cooksville 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.

Chapter 8.6.1 also contains a policy definition for how low-rise, mid-rise and high-rise buildings are to be interpreted. We oppose this policy definition and request that the definitions and characterizations of built form typologies be removed.

Overall, the above-noted policies are concerning. As the policies suggest, there are various ways of ensuring appropriate transition can be provided. There is also ambiguity given transition is not a defined term. 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 Urban Design Guidelines, which are applied as companion documents to the Official Plan, 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 or guidance 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 Official Plan. Angular planes are one of many urban design guidance tools that can and should remain in the area-specific Built Form Standards, if at all. 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 Provincial objectives and contrary to the findings of the City of Mississauga Mayor's Task Force. Finally, the continued inclusion of such policies to require transition be provided in such manners will frustrate expeditious development approvals and will also result in costly, inefficient built forms. As an example, the requirement that built forms respect an angular plane results in substantially reduced gross floor area, a reduced number of dwelling units to be accommodated, and terraced built forms that are costly to construct and significantly less energy efficient than would otherwise be the case. We also highlight that given the above implications, neighbouring jurisdictions such as the City of Toronto have recently updated their Built Form or Urban Design Guidelines to eliminate the practice of angular planes. Based on the above, we respect that the built form policies be modified to eliminate the practice and policy requirement that will lead to inefficient and costly built forms to be mandated.

**Conclusion**

In summary, we are concerned with the Mississauga Official Plan 2051 and request that the Ministry consider our proposed modifications to the Official Plan. Thank you for the opportunity to provide these comments. We wish to be informed of any future decisions made.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Jim Levac, MCIP, RPP

**Partner**

cc. Vito Valela/Leo Palozzi/John Gagliano, Gala Developments  
Jason Park, Kagan Shastri DeMelo Winer Park LLP  
Jennifer Le, Ministry of Municipal Affairs and Housing



January 21, 2022

GSAI File: 1348-001

*(Via Email to: [megan.piercey@mississauga.ca](mailto:megan.piercey@mississauga.ca))*

Chairman and Members of Planning & Development Committee  
c/o Megan Piercey, Legislative Coordinator  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

**RE: Downtown Fairview, Cooksville and Hospital Policy Review  
Augend Investments Limited  
189 Dundas Street West, City of Mississauga**

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Glen Schnarr & Associates Inc. ('GSAI') are the planning consultants to Augend Investments Limited (the 'Owner') of the lands municipally known as 189 Dundas Street West, in Cooksville, The City is currently processing a rezoning/OPA under file OZ 21/009 W7 for a large scale mixed use development of these lands. For some time we have been monitoring the various studies that will effect intensification and mixed use redevelopment in Cooksville, in light of existing and future transit infrastructure which will service this area via the Cooksville GO, Hurontario LRT and proposed Dundas BRT. While our client's lands are just outside of the Downtown Cooksville boundary, we were encouraged to see that the Dundas Connects Master Plan had identified these lands as appropriate for possible future inclusion within the Downtown Cooksville area as part of that study.

The intersection of Dundas and Hurontario Street has historically been the "epicentre" of Cooksville. In earlier iterations of Cooksville District policy documents dating back to the 1980s and up until present, the Cooksville Node boundary (now the Downtown Cooksville boundary) has remained unchanged. Historically this boundary has been confined within the CNR Tracks to the north, King Street to the south, Kirwin Avenue/Camila Road to the east and Confederation Parkway to the west. We believe with current and pending transit infrastructure improvements and the recent surge of investment in the area, that the boundaries of the Downtown Cooksville area should be reviewed as part of this ongoing study and are disappointed to see the draft OPA maintaining the boundaries dating back to the 1980s that pre-date the current provincial policy regime and numerous City initiated land use studies seeking to promote transit supportive redevelopment in Cooksville. GSAI have made earlier written submissions to staff on both this exercise and Dundas Connects that similarly reflect this position.

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The staff report speaks to the concept of creating a “15 Minute City” in Downtown Cooksville and GSAI participated in the recent webinar on this very topic co-ordinated by Ward 7 Councillor Dipika Damerla which was very well received. Drawing on the concept of the historical “four corners” of the Dundas/Hurontario Intersection being the epicentre of this community, we support the concept of a 15 Minute City centred on this area. Based on provincial planning objectives, the attached graphic visually depicts an 800 m radius around this intersection where mixed use redevelopment would benefit from an ideal trifecta of GO, LRT and future BRT transit. This will improve walkability and reduce auto dependency within this area such that it functions as a future mixed use node where increased density will help a more street related and pedestrian friendly forms of commercial development grow and thrive. We believe this reflects the vision of re-creating Cooksville as a 15 Minute City as outlined on page 4 of the staff report.

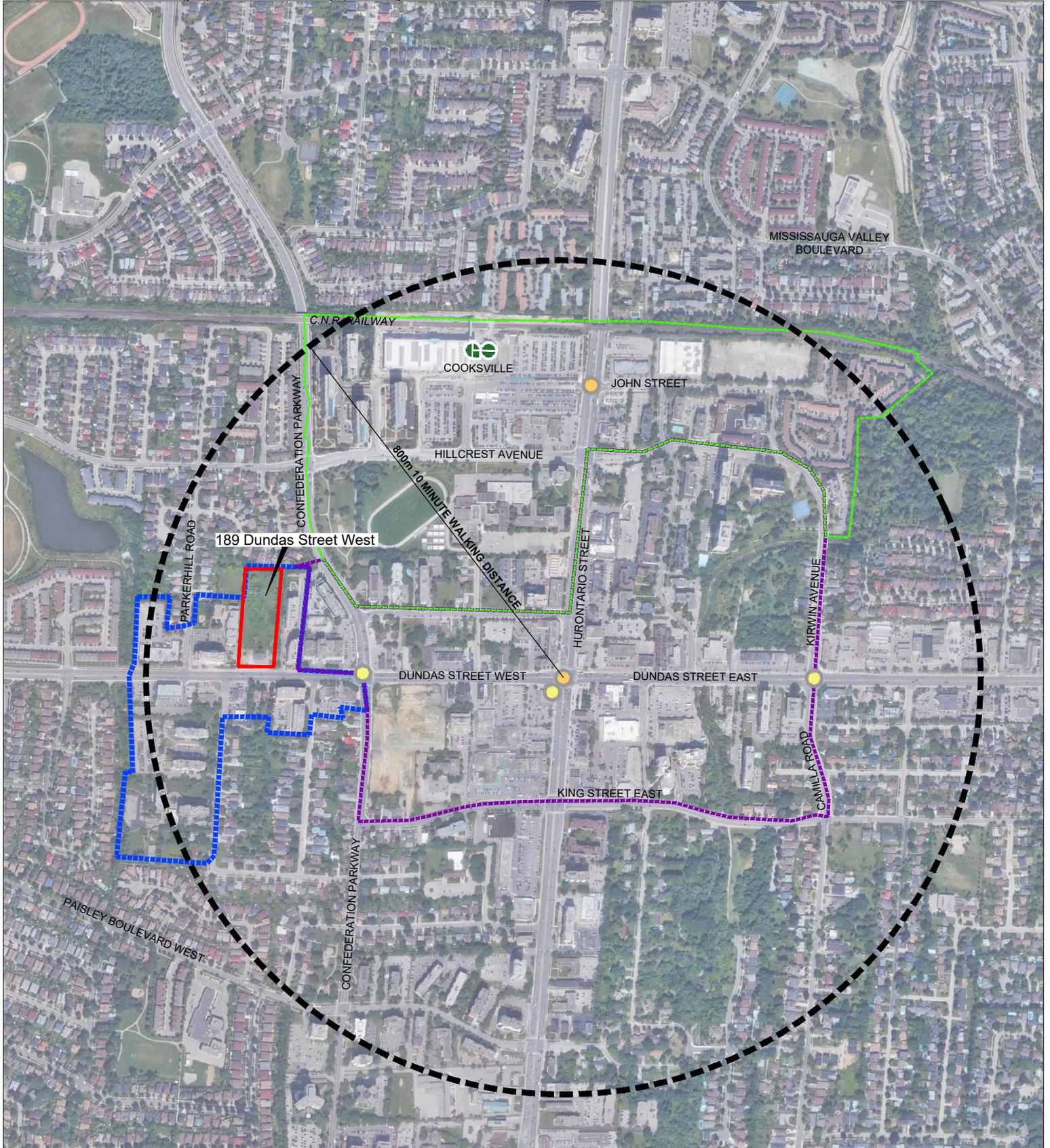
Our client’s lands represent a larger scale redevelopment opportunity within 800 m of all three transit forms and have the locational attributes that, in our opinion, contribute to the creation of a 15 Minute City. We believe the inclusion of these lands, as well as potentially other sites outside the Node boundaries, warrant consideration for inclusion within the Downtown Cooksville area. While the staff report is an Information Report only, we see this as an appropriate opportunity to present our views to Council while our proposal is still in its early stages and the final Public Meeting on the forthcoming OPA has yet to take place. We trust Council and staff will take our submission into consideration and appreciate the opportunity to participate in this important initiative.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

Jim Levac, MCIP, RPP  
Partner

Copy: client



# FIGURE 1 SITE CONTEXT PLAN

189 Dundas Street West,  
City of Mississauga, Regional Municipality of Peel

## LEGEND

-  Subject Property (189 Dundas Street West)
-  Cooksville GO Station
-  Proposed BRT Station
-  Proposed LRT Station
-  Confederation Parkway MTSA
-  Dundas MTSA
-  Cooksville GO MTSA



SCALE NTS  
JANUARY 21, 2022