



INNOVATIVE PLANNING SOLUTIONS

planners • project managers • land development

July 25, 2025

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
16th Floor, 777 Bay Street
Toronto, ON M7A 2J3
Jennifer.Le@ontario.ca

Attention: **Honourable Rob Flack, Minister of Municipal Affairs and Housing ('MMAH')**
 c/o Jennifer Le, Senior Planner, MMAH – Central Ontario

Re: **Letter Submission by 1252705 ONTARIO INC. c/o Innovative Planning Solutions Inc. ('IPS')**
 In Response to MMAH ERO for Mississauga Official Plan 2051 ('MOP 2051')
 ERO Number: 025-0468 – Ministry Reference Number: 21-OP-249936
 City of Mississauga By-law 0069-2025 ('By-law 0069-2025')
 2175 Royal Windsor Drive, Mississauga, ON L5J 1K6

This letter is submitted on behalf of 1252705 ONTARIO INC. (the 'Landowner') in response to Environmental Registry Posting ERO 025-0468 for the Mississauga Official Plan 2051 ('MOP 2051'). The purpose of this letter is to express concerns with the current Business Employment designation applied to the lands at 2175 Royal Windsor Drive ('Subject Lands') and to request targeted amendments to MOP 2051.

The Subject Lands are located within the Clarkson GO Major Transit Station Area (MTSA), adjacent to the GO Station and along Royal Windsor Drive, an identified Strategic Growth Street. Despite this prime location within one of the City's highest-priority intensification areas, the planned land use framework is not consistent with PPS 2024, and the intended role of the MTSA or Strategic Growth Area. As currently proposed, MOP 2051 is not consistent with PPS 2024 as it relates to this site.

The Landowner respectfully requests that the Subject Lands be re-designated to Mixed Use Limited, with a permitted height range of 4 to 25 storeys, and that the relevant schedules in MOP 2051 be updated accordingly. These changes will help ensure MOP 2051 conforms with provincial policy and supports the delivery of a transit-supportive, complete community.

A. MOP 2051 MODIFICATION REQUEST

The landowner's specific request is to:

- Modify Schedule 1 to remove the Subject Lands from the Employment Area designation and expand the Growth Node designation to include the site;

- Amend Schedules 7, 7L, and 8R (Land Use Schedules) to re-designate the Subject Lands as Mixed Use Limited¹;
- Modify Schedule 8R (Building Height Schedule) to permit a height range between 4 and 25 storeys.

B. CURRENT BUILT CONDITIONS

The Subject Lands are situated at the northwest corner of Royal Windsor Drive and a municipally owned access road connecting directly to the Clarkson GO Station and related transit facilities. A surface parking and a one-storey commercial building occupied by Midas (auto repair) and Enterprise (car rental) exist on the Subject Lands. Refer to Appendix 1 for an aerial image of the Subject Lands.

C. PEER REVIEW OF ENVIRONMENTAL COMPATIBILITY STUDIES

Enclosed with this letter is Martech Group's Peer Review (refer to Appendix 1) of environmental compatibility studies for adjacent lands within the Clarkson GO MTSA, which were undertaken by adjacent landowners, including the City of Mississauga.

Martech Group provided that,

- The site and area-specific land use compatibility studies prepared by adjacent landowners within the Clarkson GO MTSA do not preclude the potential for the introduction of sensitive land uses on the Subject Lands at 2175 Royal Windsor Drive;
- It is reasonable to expect that any application proposing sensitive land uses would be supported by technical studies, such as air quality, noise, and land use compatibility assessments, as part of a Zoning By-law Amendment process; and.
- Neither of the reviewed studies precludes the opportunity to consider sensitive land uses on the Subject Lands. In fact, none conclude that mixed-use development or the introduction of sensitive land uses would be unfeasible, unreasonable or unachievable. Rather, it is reasonable to conclude that such uses could be supported, subject to the findings of a land use compatibility assessment and the implementation of appropriate mitigation measures to ensure consistency with PPS 2024 and municipal policy objectives.

D. PROVINCIAL LAND USE PLANNING POLICY

Planning Act

Planning Act Definition of Area of Employment (Section 1(1)): An *area of employment* means lands designated for clusters of business and economic uses, including:

- Manufacturing;
- Research and development connected to manufacturing;
- Warehousing and goods movement;

¹ Policy 10.2.9.4 of MOP 2051 provides a series of criteria that would need to be reviewed and evaluated prior to the approval of planning applications requesting to develop residential land uses and other sensitive land uses on lands designated as *Mixed Use Limited*. The *Mixed Use Limited* designation is applicable to the Dixie-Dundas Character Area and MTSA, and its expansion to other areas in the City, including the Subject Lands should be considered.

- Associated retail and office uses; and
- Ancillary facilities.

Excluded uses include institutional and commercial uses (retail and office not associated with the above).

PPS 2024

PPS 2024 defines employment areas as lands for clusters of economic activities primarily related to manufacturing, warehousing, goods movement, and related retail/office, excluding institutional and unrelated commercial uses. Given that the Subject Lands are currently used for automobile commercial purposes (auto repair and car rental), **they do not meet the employment area definition under either the Planning Act or PPS 2024 and should not be designated or treated as employment lands in MOP 2051.**

PPS 2024 defines *strategic growth areas* to mean 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. Strategic growth areas include major transit station areas, existing and emerging downtowns, lands in close proximity to publicly-assisted post-secondary institutions and other areas where growth or development will be focused, that may include infill, redevelopment (e.g., underutilized shopping malls and plazas), brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.*

The Subject Lands are within a strategic growth area associated with the Clarkson GO MTSA and existing and planning transit infrastructure along Royal Windsor Drive and Southdown Road.

Policy 2.4.1.2 of PPS 2024 provides,

To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned:

- a) to accommodate significant population and employment growth;*
- b) as focal areas for education, commercial, recreational, and cultural uses;*
- c) to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and*
- d) to support affordable, accessible, and equitable housing.*

Policy 2.4.1.2 of PPS 2024 calls for Strategic Growth Areas to support complete communities through mixed-use intensification, diverse housing, and transit integration. The Subject Lands, located within the Clarkson GO MTSA, are well-positioned to meet these objectives; however, the current Employment Area designation restricts this potential. The lands should be re-designated to support mixed-use development that aligns with the area's planned role and provincial direction within MOP 2051, in order to be consistent with PPS 2024.

Policy 2.4.1.3 of PPS 2024 provides, *Planning authorities should:*

- a) *prioritize planning and investment for infrastructure and public service facilities in strategic growth areas;*
- b) *identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas;*
- c) *permit development and intensification in strategic growth areas to support the achievement of complete communities and a compact built form;*
- d) *consider a student housing strategy when planning for strategic growth areas; and*
- e) *support redevelopment of commercially-designated retail lands (e.g., underutilized shopping malls and plazas), to support mixed-use residential.*

Policy 2.4.1.3 directs planning authorities to enable mixed-use intensification, infrastructure investment, and compact built form in Strategic Growth Areas. The Subject Lands, within the Clarkson GO MTSA, align with these objectives but remain constrained by restrictive land use designations in MOP 2051. Re-designation is necessary to realize the policy intent and unlock appropriate redevelopment potential and to realize the planned context of the SGA and the MTSA.

Policy 2.8.1 of PPS 2024 provides,

1. *Planning authorities shall promote economic development and competitiveness by:*
 - a) *providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
 - b) *providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
 - c) *identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
 - d) *encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and*
 - e) *addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*
2. *Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects are encouraged in strategic growth areas and other mixed-use areas where frequent transit service is available, outside of employment areas.*
3. *In addition to policy 3.5, on lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long term economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines.*
4. *Major office and major institutional development should be directed to major transit station areas or other strategic growth areas where frequent transit service is available.*

PPS 2024 plans for and encourages a modern economy through a broader range and mix of non-employment and mixed-use development to meet long-term needs of existing and future residents. The

Subject Lands can support intensification that promotes compatible, compact, mixed-use development that contributes to complete communities within the Clarkson GO MTSA. Future mixed-use development on the Subject Lands recognizes the importance of balancing growth with land use compatibility, ensuring appropriate transitions to sensitive uses adjacent to employment areas. The development approach for the Subject Lands would be a commitment to avoid or mitigate adverse impacts on the long-term viability of nearby employment uses, thereby fostering sustainable economic and community development consistent with provincial guidelines.

Policy 2.8.2.4 of PPS 2024 provides,

Planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas.

Policy 2.8.2.5 of PPS 2024 provides,

Planning authorities may remove lands from employment areas only where it has been demonstrated that:

- a) there is an identified need for the removal and the land is not required for employment area uses over the long term;*
- b) the proposed uses would not negatively impact the overall viability of the employment area by:
 - 1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;*
 - 2. maintaining access to major goods movement facilities and corridors;**
- c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and*
- d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.*

While Policy 2.8.2.4 of the PPS 2024 directs planning authorities to maintain land use compatibility between employment areas and sensitive land uses, such compatibility can often be effectively addressed through site-specific development applications that incorporate appropriate mitigation measures. In alignment with Policy 2.8.25, site-specific proposals may also demonstrate that the lands are no longer required for long-term employment uses, that infrastructure is in place to support new uses, and that impacts on the viability of adjacent employment functions can be appropriately minimized or mitigated.

Rigidly maintaining employment designations without regard to the evolving policy context, particularly within MTSA's and SGAs, risks undermining broader planning objectives related to intensification, complete communities, and transit-oriented development. A more nuanced, site-sensitive approach allows municipalities to realize the intended mixed-use vision for these areas, while still protecting the long-term viability of adjacent employment functions in accordance with

land use compatibility policies and best practices to avoid, and where avoidance isn't possible, minimize and mitigate potential impacts of employment land uses.

E. MISSISSAUGA OFFICIAL PLAN 2051 (MOP 2051) & CLARKSON GO MTSA REVIEW

OPA 182

Mississauga's Council recently approved Official Plan Amendment 182 (OPA 182), which updates MOP 2051 to align with the revised definition of "area of employment" in the Planning Act and PPS 2024. Policy 16.2.1.1 in MOP 2051 clarifies that non-permitted uses within an area of employment are permitted to continue if lawfully established prior to October 20, 2024. It provides that,

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.

While OPA 182 introduces important clarity regarding legal non-conforming uses within Employment Areas, it does not provide a reasonable or proactive planning path forward for strategic intensification in MTSAs such as the Subject Lands. In our view, this falls short of meeting the municipal and provincial intensification objectives and policy expectations and is not consistent with PPS 2024.

MOP 2051

MOP 2051 assigns several overlapping land use categories and policy layers to the Subject Lands and their immediate surroundings; all located within the Clarkson GO MTSA. These include the following:

1. Employment Area and Protected Major Transit Station Area (PMTSA)

- As per Schedule 1 – City Structure (see Appendix 1), the Subject Lands are designated as part of the Southdown Employment Area and are also located within a Protected Major Transit Station Area (PMTSA).

2. Strategic Growth Area – Arterial Corridor

- Per **Schedule 3 – Long Term Street Network** (see Appendix 2), the Subject Lands front onto **Royal Windsor Drive**, which is identified as an **Arterial Strategic Growth Street**. This classification supports intensification and higher-order transit-supportive development.

3. Within a Major Transit Station Area (MTSA) Boundary

- According to **Schedule 4 – Long Term Transit Network** (see Appendix 3), the Subject Lands fall **within the delineated MTSA boundary** and are located adjacent to an **existing Mississauga Transit terminal**, associated with the **Clarkson GO Rail Station**, a key regional transit hub and third busiest GO Station in Ontario.

4. Employment Area – Business Employment Designation

- As illustrated in **Schedule 7 / 7L – Land Use Designations** (refer to Appendix 4), the Subject Lands are designated **Business Employment** within an **Employment Area**.
- Notably, Schedule 7L also identifies the **east side of Southdown Road**, immediately adjacent to the Subject Lands, as a **Strategic Growth Area**, specifically designated as a **Growth Node**.

5. Built Form and Height Policies within Clarkson GO MTSA

- Per **Schedule 8R – Building Heights** (refer to Appendix 5), the Subject Lands are located within the **Clarkson GO PMTSA**, which establishes a **minimum building height of 2 storeys**.
- Despite being within a PMTSA and MTSA, the lands retain a Business Employment designation with no supportive policy framework to facilitate residential or mixed-use redevelopment.

Policies 3.3.1.1 and 3.3.5 recognizes MTSA as SGAs; however, within Schedules 7 and 7L omits the inclusion of the Clarkson GO MTSA.

Policy 7.3.4.1.a, recognizes the important role of Arterial Strategic Growth Streets in supporting active transportation, mixed-use development, and higher-density, transit-supportive built form; however, MOP 2051 does not appropriately reflect this planned context for the Subject Lands and precludes opportunities to implement residential and mixed-use development in a manner aligned with provincial intensification goals and consistent with PPS 2024.

MOP 2051 provides that Major Office and Major Institutional uses, as well as retail and services will be directed to Major Transit Station Areas (Policy 11.3.1.2); however, the assigned Business Employment land use designation in Schedule 7/7L, does not provide opportunities to implement these uses without an Official Plan Amendment Application. This outcome does not align with the policy objectives of PPS 2024, which support the efficient use of land within Major Transit Station Areas to accommodate a range of housing and employment options, and is not consistent with PPS 2024.

MOP 2051 provides compatibility policies in 11.3.4, 11.3.4.2, and 16.2.1.2. MOP 2051 collectively recognize that development within MTSA and near areas of employment or employment areas must be carefully managed to ensure land use compatibility. These policies establish a framework that allows for new development, particularly sensitive land uses, provided that impacts on adjacent employment operations are avoided or appropriately mitigated. **Rather than prohibiting mixed-use or residential development, the policies acknowledge that such development may be permitted where compatibility can be demonstrated through appropriate studies, mitigation measures, and design solutions.**

F. PLANNING JUSTIFICATION FOR MODIFICATION TO MOP 2051

Our view is that the proposed policies set out in MOP 2051 are not consistent with provincial planning policy in PPS 2024 relating to Policies 2.4.1, 2.4.2, 2.8.1, and 2.8.2.4.

It is clear that the planned function for the Subject Lands in policy 2.8.2.4 of PPS and for lands within a Strategic Growth Area and MTSA is to provide for intensification on such lands for non-employment uses. MOP 2051 has not provided that for the Subject Lands and therefore is not consistent with PPS 2024.

OPA 182 grandfathered provisions for non-employment land uses within existing employment land use designated lands. The landowner does not object to OPA 182; however, what it fails to do, is provide a reasonable path forward to achieve intensification that is contemplated in PPS 2024.

Part of the City of Mississauga's justification for "preserving and protecting employment land use" in the Clarkson GO MTSA is self-serving, as they seek to preserve the Clarkson Works Yard. As such, it is our opinion that the City of Mississauga is defining the character area for employment area, and that other land uses will continue to exist, i.e., Musket Transport Ltd., at 2215 Royal Windsor Drive. This is not

consistent with PPS 2024 as it undermines the policy objectives for SGAs and MTSAs. The Subject Lands should have the opportunity to transition, as PPS 2024 does not preclude the consideration of conversion of lands from employment to non-employment land uses.

There is a reasonable expectation that the Subject Lands should be considered to permit Major Office and Major Institution (within MOP 2051), as indicated in Policy 2.8.1.4 of PPS 2024; however, MOP 2051 does not provide the lands the opportunity to implement these uses without an Official Plan Amendment Application. This isn't consistent with PPS 2024. Policy 11.3.1.2 in MOP 2051 speaks to Major Office and Major Institutional, as well as retail and services will be directed to MTSAs; however, MOP 2051 does not permit these uses for the Subject Lands, which runs counter to the direction provided in PPS 2024 regarding intensification in transit-supportive locations.

Within SGAs and MTSAs, it is critical to recognize higher-order infrastructure investments and land use compatibility, and it is our opinion that MOP 2051 and OPA 182 doesn't reasonably balance these considerations as required under PPS 2024.

The Subject Lands are situated within a layered policy framework that unequivocally identifies them as part of a high-priority growth area in Mississauga. Located within a Major Transit Station Area, along an Arterial Strategic Growth Street (Royal Windsor Drive), and adjacent to the Clarkson GO Station and Mississauga Transit Terminal, the lands are ideally positioned to support compact, mixed-use, and transit-oriented development consistent with the growth and intensification objectives of MOP 2051 and PPS 2024.

Despite this favorable context, MOP 2051 maintains a restrictive Employment Area and Business Employment designation over the Subject Lands. This designation does not reflect their existing use, the surrounding urban character, or the planned function of the area as a Strategic Growth Area. Moreover, it precludes residential and mixed-use permissions necessary to accommodate population and job growth and to fulfill the MTSA and SGA policy intent. While the City's interest in retaining its works yard is acknowledged, this operational need should not inhibit the appropriate intensification of adjacent parcels that clearly meet the criteria for mixed-use redevelopment.

Importantly, MOP 2051 provides a robust policy framework for addressing land use compatibility. Policies 11.3.4 and 16.2.1.2 support the introduction of non-employment and sensitive uses, including residential development, where compatibility can be demonstrated through technical studies, design mitigation, and planning review. These policies recognize that redevelopment can proceed in proximity to employment uses, provided that potential adverse impacts are adequately avoided, minimized, or mitigated.

By maintaining restrictive legacy designations within an MTSA, MOP 2051 is not only inconsistent with PPS 2024 but actively frustrates its objectives of promoting transit-oriented development and efficient land use.

G. CONCLUSION AND REQUEST

In summary, the Subject Lands are ideally situated within a Major Transit Station Area and Strategic Growth Area and are supported by high-order transit infrastructure and arterial road access. Despite this

context, the lands remain constrained by a legacy Employment Area designation that neither reflects their existing non-employment use nor supports the planned function of this area under PPS 2024.

We respectfully request that Schedules 1, 7/7L, and 8R of MOP 2051 be amended to re-designate the Subject Lands to Mixed Use Limited, with an associated building height range of 4 to 25 storeys. This modification would enable context-sensitive intensification, promote the development of a complete community, and bring the Mississauga Official Plan into full conformity with provincial policy direction for transit-supportive growth.

We respectfully request that MMAH give full consideration to this submission and work with us to implement the proposed modifications to ensure that MOP 2051 fully aligns with provincial direction and enables the delivery of complete, transit-supportive communities in the Clarkson GO MTSA.

Respectfully submitted,
Innovative Planning Solutions



Kevin Bechard, BES, M.Sc., RPP
Senior Associate



Mathew Halo, BURPL, RPP
Associate

- c. 1252705 ONTARIO INC.
Rudy Cuzzetto, MPP – Mississauga—Lakeshore
Alvin Tedjo, Ward 2 Councillor – City of Mississauga
Luisa Galli, Executive Manager – Planning Programs – City of Mississauga

- Encl. Appendix 1 – Peer Review of Environmental Compatibility Studies, prepared by Martech Group, dated
- Appendix 2 – Image of the Subject Lands
- Appendix 3 – Schedule 1 City Structure MOP 2051
- Appendix 4 – Schedule 3 Long Term Street Network MOP 2051
- Appendix 5 – Schedule 4 Long Term Transit Network MOP 2051
- Appendix 6 – Schedule 7/7L Land Use Designations MOP 2051
- Appendix 7 – Schedule 8R Clarkson GO PMTSA
- Appendix 8 – Letter submissions made to the City of Mississauga on MOP 2051 and Clarkson GO MTSA Master Plan process

APPENDICES

**Peer Review of Environmental Compatibility Studies
Proposed Residential Development
2175 Royal Windsor Drive, Mississauga, ON**

Prepared For:
1252705 Ontario Inc.
14 Ellery Dr, Richmond Hill, ON L4C 7X1

Attention to:
Mr. Nick Mercouris
Accounting Manager

Project No: 2507-014
Date: 24th July , 2025

July 24, 2025

Attention: Mr. Nick Mercouris

Accounting Manager, 1252705 Ontario Inc.
14 Ellery Dr, Richmond Hill, ON L4C 7X1

Re: Peer Review Letter – Applicability of Environmental Compatibility Studies to 2175 Royal Windsor Drive, Mississauga, ON

Reports Reviewed:

- **Land Use Compatibility Study for 2157 Royal Windsor Drive, Mississauga, ON** – WSP Canada Inc., December 2024
- **Air Quality Study for 2157 Royal Windsor Drive, Mississauga, ON** – WSP Canada Inc., December 2024
- **Noise Feasibility Study for 2157 Royal Windsor Drive, Mississauga, ON** – WSP Canada Inc., December 2024
- **Clarkson Transit Station Area Air Quality Study for 2077, 2087, 2097, and 2105 Royal Windsor Drive** – WSP Canada Inc., February 2023
- **Clarkson Air Quality, Noise & Vibration and Radiofrequency Compatibility Overview Study** – Dillon Consulting Limited, January 2020
- **Clarkson Environmental Overview - Additional Industries / Businesses Air Quality, Noise and Vibration Impact – A D-6 Assessment (Addendum)** – Dillon Consulting Limited, December 2024
- **Executive Summary – Clarkson Residential Development Air Quality and Human Health Assessment Studies** – Dillon Consulting Limited, March 2023

Following our review of the documentation provided by Mr. Nick Mercouris, 1252705 Ontario Inc. (hereafter referred to as “the Client”), Martech Group Inc. (hereafter referred to as “Martech”) has conducted a peer review of the land use compatibility, air quality, and noise studies previously completed for properties located at 2157, 2077, 2087, 2097, and 2105 Royal Windsor Drive, within the Clarkson Major Transit Station Area (MTSA) in Mississauga, Ontario. These studies were originally prepared in support of proposed residential and mixed-use developments at those locations. The purpose of this review is to determine the applicability of those findings and mitigation recommendations to the proposed residential development at 2175 Royal Windsor Drive, Mississauga, ON.

Planning and Environmental Context

All sites noted, including 2175 Royal Windsor Drive, fall within the Clarkson MTSA—a designated growth node under Ontario’s Transit-Oriented Communities (TOC) framework. The area is characterized by:

- Proximity to the Clarkson GO Station and CN Rail Corridor;
- Surrounding industrial land uses, including Class I, II, and III facilities;
- Ongoing and planned high-density residential intensification along Royal Windsor Drive;
- Significant exposure to transportation-related and stationary source emissions, including air contaminants, noise, odour and vibration.

The studies reviewed were conducted in accordance with:

- MECP Guidelines D-1 (Land Use and Compatibility), D-6 (Industrial Proximity)
- NPC-300 (Noise Guidelines for Stationary and Transportation Sources)
- Ontario Regulation 419/05 (Air Quality), and
- FCM-RAC Rail Proximity Guidelines,

Each study consistently identified the need for design-level mitigation to ensure compatibility between new sensitive uses and existing industrial/transportation sources.

Peer review Summary of Technical Reports

1. Land Use Compatibility (WSP, Dec 2024 – 2157 Royal Windsor Dr)

- The site is immediately adjacent to industrial uses including Musket Transportation, CN Clarkson Yard, and AGT Products.
- Identified 5 facilities within the Minimum Separation Distance (MSD) and 9 within the Potential Influence Area (PIA) under MECP D-6.
- The area includes Class I, II and III industrial uses, rail yards, and arterial roads;
- Compatibility concerns include air emissions, noise, odour, and vibration from medium and heavy industrial uses.
- Royal Windsor Drive is an arterial road with traffic volumes exceeding 15,000 AADT, indicating a need to evaluate Traffic-Related Air Pollution (TRAP) exposure.

Recommendations by WSP:

- Proceed with development using D-6 Section 4.10 flexibility, given the area's planned intensification.
- Apply building orientation, buffering, air intakes design, and mitigation zones to reduce exposure.
- Land use compatibility is feasible with design-level mitigation.

Martech Review:

Following our review of the land use conflict analysis, separation distance mapping, and application of MECP Guideline D-6, we agree with the methodology and support the study's findings and recommendations as technically sound and appropriate.

2. Air Quality Study (WSP, Dec 2024 – 2157 Royal Windsor Dr)

- Modeled cumulative emissions from adjacent industrial sources and transportation corridors.
- Key contaminants assessed: PM2.5, PM10, NO₂, SO₂, CO, VOCs (e.g., benzene, xylene), odorous compounds (e.g., H₂S)
- Cumulative effects from transportation and industrial sources were quantified;
- All contaminant levels were predicted to be within regulatory limits, except benzo(a)pyrene, which exceeds annual and 24-hour limits.

-
- Other parameters such as Total Reduced Sulphur (TRS) and xylene were found to be well below applicable thresholds, indicating a low risk of odour-related nuisance
 - Main contributors to air impacts are transportation sources (road and rail). Impacts from stationary industrial sources are minimal due to prevailing wind direction (from west-southwest and east-northeast).

Recommendations by WSP:

- Sealed building envelopes with high-performance insulation;
- HVAC systems should include effective particulate filtration (for benzo(a)pyrene and PM);
- Ensure regular HVAC inspection and maintenance as per manufacturer guidelines.
- Incorporation of landscaped buffers, setbacks, or podium-based OLA relocation where feasible.
- With these measures in place, the site is considered compatible for new sensitive land uses.

Martech Review:

Upon reviewing the data inputs, dispersion modelling, and air contaminant analysis, Martech Group finds the study to be well-executed and agrees with its conclusions and recommended mitigation strategies.

3. Noise Feasibility Study (WSP, Dec 2024 – 2157 Royal Windsor Dr)

- Transportation noise from Royal Windsor Dr. and rail corridor exceeds NPC-300 thresholds for both indoor and outdoor areas
- Stationary noise from facilities like Musket Transportation, AGT Products, and others contribute to facade noise levels exceeding 65 dBA;
- The area is undergoing transition and may qualify as a Class 4 noise area, which allows for higher noise thresholds if mitigation is provided.

Recommendations by WSP:

- Noise barriers (2.5–3.5 m height) around OLAs;
- Locate OLAs on podium rooftops or shielded internal courtyards
- High STC windows, brick or masonry facades for rail facing units;
- Central air conditioning systems to allow closed-window condition;
- Compliance with Class 4 designation per NPC-300 for receptor-based control;
- Use of warning clauses in sales and lease agreements.

Martech Review:

We reviewed the transportation and stationary source modelling, facade noise predictions, and proposed Class 4 designation. Martech supports the report's approach and agrees with the recommendations for noise control and planning mitigation.

4. Clarkson Transit Station Area Air Quality Study (WSP, Feb 2023 - 2077, 2087, 2097, and 2105 Royal Windsor Dr)

- Contaminants exceeding air quality thresholds: Benzene, acrolein, PM10, PM2.5, NOx, benzo(a)pyrene.
- These exceedances are largely due to transportation-related emissions (road and rail), not stationary sources.
- Cumulative impacts of air pollutants are consistent with other urban areas in Ontario and Canada.
- Modelled contributions from the proposed development are minimal, especially for acrolein, benzene, and benzo(a)pyrene.
- Health risk assessment shows cumulative levels are within urban norms and mainly driven by background conditions.

Recommendations by WSP:

- No mandatory mitigation required, but voluntary indoor air quality improvements are advised.
- For suites below 12.9 m (4th floor)- Use filters (PM2.5/PM10 with carbon) in local air intakes or use centralized air intakes placed above 12.9 m.
- Ambient monitoring is recommended if local filtration is used.

Martech Review:

The dispersion modelling, cumulative impact analysis, and supporting health assessment were reviewed in detail. Martech concurs with the study's conclusions and finds the recommendations for indoor air quality enhancement to be appropriate and well-justified.

5. Clarkson Air Quality, Noise & Vibration and Radiofrequency Compatibility Overview Study (Dillon Consulting, Jan 2020)

Air Quality

- Historical air monitoring (Clarkson Airshed Study) showed exceedances in VOC levels, particularly benzene, acrolein, and dichloromethane, raising human health concerns.
- Particulate matter (PM2.5) concentrations occasionally met or exceeded Ambient Air Quality Criteria (AAQC).
- There are multiple Class II and Class III industries within close proximity to the MTSA (e.g., cement plants, chemical manufacturers, refineries), all of which contribute significantly to air contaminants, dust, and odours.
- Wind patterns from the south and west frequently carry emissions towards the MTSA.
- Sensitive land uses (e.g., residential or institutional) are proposed near emission sources.

Recommendations by Dillon Consulting :

- Conduct detailed air quality assessments (dispersion modelling and monitoring) for areas identified within the minimum influence distance of industrial facilities.
- Assess nuisance impacts (dust and odour) at proposed sensitive receptor sites.
- Require an updated air quality monitoring program, including VOCs like benzene and acrolein, and include seasonal variation.
- Consider Human Health Risk Assessments (HHRA) for any new sensitive land use proposals within the MTSA.
- Implement air contaminant control measures at source industries, including dust collectors, catalytic converters, and biofilters where appropriate.

Noise and Vibration

- Multiple industrial facilities and transportation-related operations within 2 km of the MTSA generate significant stationary and mobile noise (e.g., crushers, trucks, HVAC units).
- Potential for vibration impacts exists, especially from large-scale aggregate and manufacturing operations (e.g., stamping or heavy machinery).
- Existing background levels in residential areas are well below thresholds of perception, but development closer to industrial operations may change this.

Recommendations by Dillon Consulting:

- Perform Acoustic Assessments and vibration impact assessments before approving any new sensitive land uses within 300 m of Class II or III industrial facilities.
- Design residential or institutional developments with enhanced building envelope insulation and non-operable windows, especially those facing industrial sources.
- Maintain a minimum separation distance in line with MECP D-Series Guidelines (70 m to 300 m depending on industrial classification).
- Implement receptor-based mitigation measures, including sound barriers, setbacks, or operational limits for industries where feasible.

Radiofrequency (RF) Compatibility

- The CFRB1010 AM radio transmission antenna array emits at 1,010 kHz, located within the study area.
- RF exposure is regulated under Health Canada's Safety Code 6 (2015), which sets limits based on Specific Absorption Rate (SAR) and Nerve Stimulation (NS).
- The analysis showed that predicted RF field strengths are below the regulatory limits, even at the edge of the proposed development zones.

Recommendations by Dillon Consulting:

- No mitigation measures are required under current land use plans as RF exposure levels are compliant with Safety Code 6.

-
- Continue to monitor RF compliance if any changes are made to the antenna array or major vertical developments are introduced within close proximity.

Martech Review:

After reviewing the multi-parameter analysis (air, noise, vibration, RF exposure), we find the report's methodology comprehensive. Martech agrees with the study's findings and supports the layered mitigation framework presented.

6. Clarkson Environmental Overview - Additional Industries / Businesses Air Quality, Noise and Vibration Impact – A D-6 Assessment (Addendum) (Dillon Consulting , Dec 2024)

- Assessed 4 nearby industrial sites (Midas, Bernardi, Musket, Clarkson Yard).
- All are Class I or II industries and within influence areas under MECP Guideline D-6.
- Identified potential air quality impacts (dust, combustion, fuel vapours) and noise from truck/equipment use.
- Vibration impacts are minor and not expected to affect nearby sensitive uses.

Recommendations by Dillon Consulting:

- Conduct detailed air quality and noise studies before approving nearby sensitive uses.
- Consider source controls (e.g., dust collectors, acoustic barriers) and building-side mitigation (e.g., upgraded facade materials).

Martech Review:

We have reviewed the industrial classification, influence area mapping, and summary of environmental impacts. Martech agrees with the findings and supports the proposed recommendations for both source and receptor-based mitigation.

7. Executive Summary – Clarkson Residential Development Air Quality and Human Health Assessment Studies (Dillon Consulting, Mar 2023)

- WSP assessed emissions from traffic, rail, and industrial sources for a proposed residential site.
- Six contaminants (e.g., PM2.5, NOx, benzene) exceeded air quality thresholds—mostly due to urban background levels.
- Health risk assessment found no unacceptable risk; risks are typical of urban GTA areas.

Recommendations by Dillon Consulting:

- Development can proceed; mitigation is not required but encouraged to improve indoor air quality:
- Filtered HVAC systems, centralized intakes for lower floors, and possible ambient monitoring

Martech Review:

The reviewed summary of emissions modelling and cumulative health risk analysis is well-structured. Martech agrees with the health-based conclusions and supports the suggested indoor air quality improvement measures.

Applicability of Reviewed Studies to 2175 Royal Windsor Drive

Based on our review and professional assessment, we confirm that the environmental conditions, sources of impact, and planning context identified in the reviewed reports are substantially similar to those applicable to the subject site at 2175 Royal Windsor Drive. The site is located within the same Clarkson Major Transit Station Area (MTSA), shares exposure to the same industrial operations, road and rail infrastructure, and is affected by the same transportation-related and stationary source emissions.

Given the above, and in the absence of unique environmental constraints at 2175 Royal Windsor Drive, it is our opinion that the findings, conclusions, and recommended mitigation measures contained within the previously completed studies are directly applicable and transferable to the subject site. These include, but are not limited to:

- Building envelope and HVAC design measures to improve indoor air quality;
- Noise mitigation strategies, including potential application of Class 4 noise designation;
- Implementation of air, noise, and odour control recommendations per MECP guidelines and best practices;
- Use of appropriate warning clauses in purchase and lease agreements.

Should the proposed development at 2175 Royal Windsor Drive proceed in a similar form, function, and land use as the nearby reviewed projects, we recommend that no additional baseline studies or further studies are required at this stage. However, site-specific refinement of mitigation should be completed during the site plan and detailed design stages.

We trust this review and our recommendations will assist in determining the appropriate next steps. Please contact us if you require further clarification or if additional support is needed.

Sincerely,

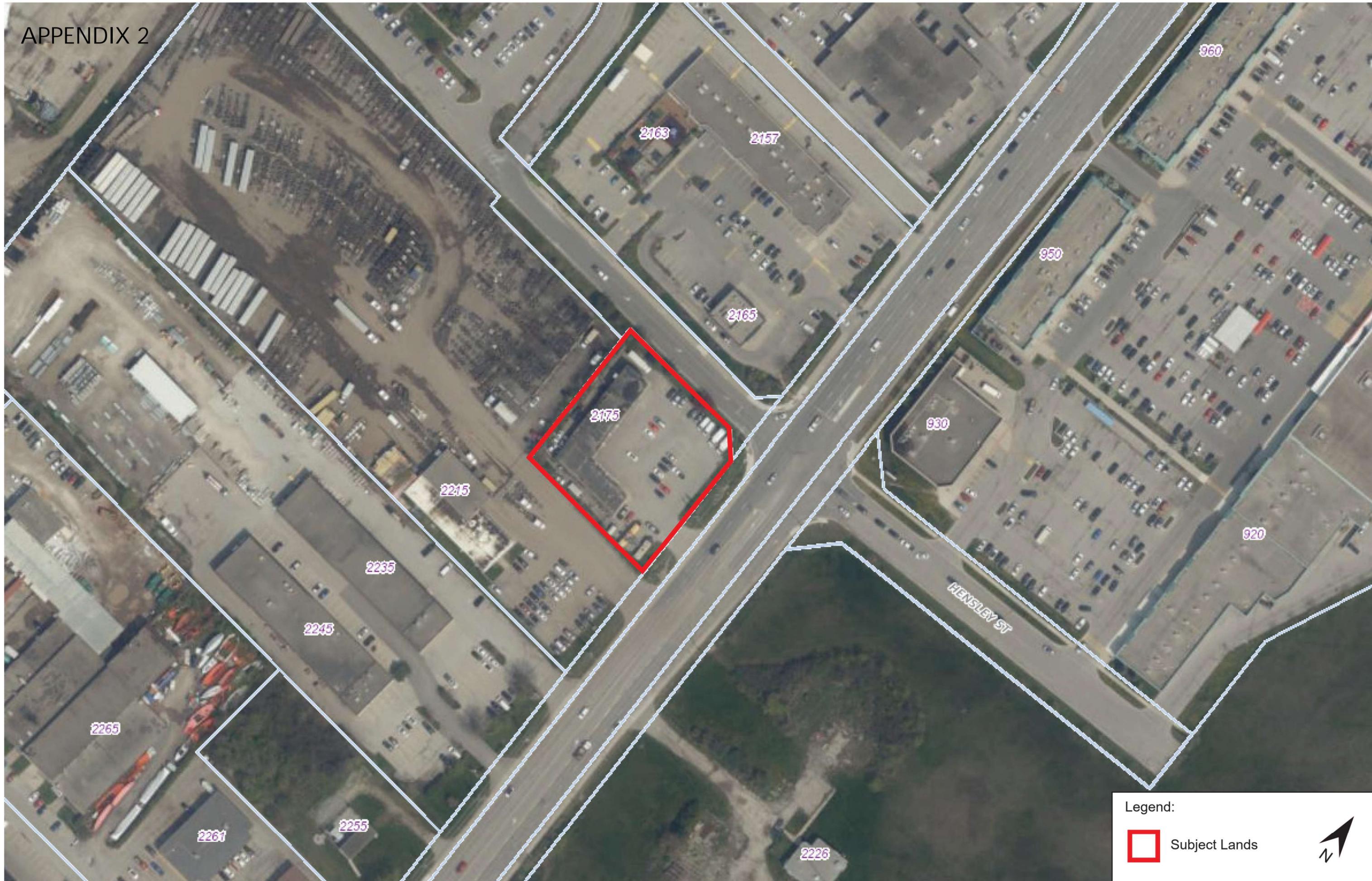
Best Regards,



Marwan Essa, P.Eng, P.GSC, QP_{ESA}

Martech Group Inc.

Members: PEO, AIHA, ACGIH, EACO, ECO, CCA



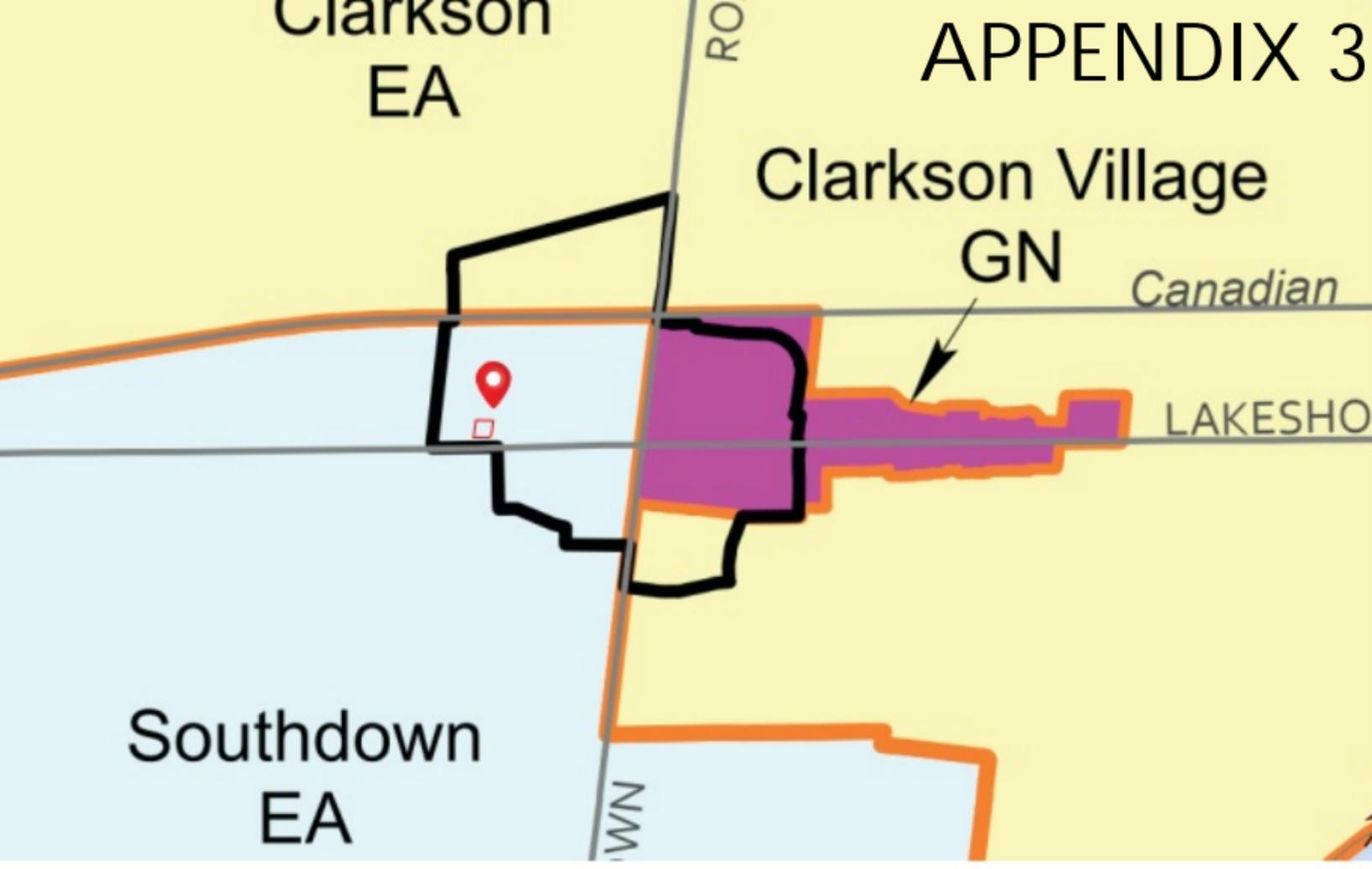
Legend:

 Subject Lands



APPENDIX 3

Schedule 1 City Structure



- Strategic Growth Areas
- Downtown Core
 - Growth Centre (GC)
 - Growth Node (GN)
 - Protected Major Transit Station Area (PMTSA)
 - Planned Major Transit Station Area with 800m radius circle
-
- City Structure
- Neighbourhood (NHD)
 - Employment Area (EA)
 - Lakeview Innovation Corridor Employment Area
 - Special Purpose Area (SPA)
 - Character Area
 - Special Policy Area







APPENDIX 7



APPENDIX 8





INNOVATIVE PLANNING SOLUTIONS

planners • project managers • land development

December 6, 2024

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

Attention: Andrew Whittemore, M.U.R.P., Commission of Planning and Building

Re: Planning and Development Committee – Item 6.2
Clarkson GO Major Transit Station Area (MTSA) – Master Plan
City File: CD.21-CLA
2175 Royal Windsor Drive
City of Mississauga

Innovative Planning Solutions Inc. ('IPS') is the planning consultant for the landowners of 2175 Royal Windsor Drive, in the City of Mississauga (herein known as the '**Subject Lands**'). This letter is submitted to Planning and Development Committee in relation to Item 6.2 on the December 9, 2024, Agenda, *Recommendation Report (Ward 2) Clarkson GO Major Transit Station – Master Plan*.

The Subject Lands are currently envisioned under the Draft Clarkson GO Major Transit Station (MTSA) – Master Plan ('**Draft Master Plan**') as *Employment Area – Business* in Map 9 – Concept Plan of the September 2024 Draft MTSA document.

This letter identifies that the proposed lands use planning framework for the Clarkson GO MTSA is not consistent with the Provincial Planning Statement 2024 ('**PPS 2024**') and requests that the City of Mississauga reconsider the effect of the land use strategy for the Subject Lands providing for a broader range and intensification of land uses.

Framing the Subject Lands

The Subject Lands are located on the **north** side of Royal Windsor Drive and are occupied by an L-shaped building with 1 and 2 storey components, at-grade parking and automotive mechanic and car rental uses. The Subject Lands maintain a singular vehicular access on Royal Windsor Drive and maintain frontage on Royal Windsor

Drive and a city-owned unnamed road, which provides vehicular access from Royal Windsor Drive to the city's Clarkson Yard, the commercial plaza at 2157 Royal Windsor Drive and the Clarkson GO Station Lands. Southeast of the Subject Lands is the Clarkson Crossing Shopping Centre.

Section 1.4 of the September 2024 Master Plan document provides that ***within the Clarkson GO MTSA, the lands south of Royal Windsor Drive and west of Southdown Road, form part of the Southdown Employment Area...is home to several large-scale industrial users...[and] is made up of heavy and light industrial, mixed commercial, and open space users.***

Map 5 in the Draft Master Plan identifies the Subject Lands as General Retail Commercial lands and indicates other General Retail Commercial along Royal Windsor Drive. Inclusive of the Subject Lands, it can be observed that approximately 450-metres of Royal Windsor Drive (north and south) are lands that are identified as General Retail Commercial lands and one lot (2133 Royal Windsor Drive) as Industrial and Commercial Multiples.

The Subject Lands are located within the Clarkson GO MTSA Area and are designated as *Business Employment* in the City of Mississauga Official Plan ('**MOP**'). The Draft Clarkson GO MTSA Master Plan proposes that the Subject Lands maintain its Employment designation under the MOP and seeks to designate them as *Employment Area – Business* (per Map 9 – Concept Plan in the Draft Master Plan).

Section 2 of the Draft Master Plan provides that,

- *A mix of uses is encouraged throughout the MTSA...with the highest density development adjacent to the Clarkson GO Transit Station to create vibrant and active nodes north and south of the rail corridor.*
- *Notwithstanding the permitted uses within the 'Mixed-Use' Area, proposed development may be subject to the completion of a land use compatibility analysis where appropriate, among other studies, to the satisfaction of the City.*
- *Employment uses are encouraged throughout the MTSA. Within the Clarkson MTSA, the Employment Area should have a mix of employment generating land uses and contribute to the Pedestrian Realm / Active Transportation Network.*
- *In the Employment Area, the following uses shall continue to be permitted:*
 - *Offices, Financial institutions, Research and development facilities, Commercial schools, Retail stores, restaurants and personal service uses,*

Hotels, Conference/convention centres, Banquet facilities, and Cultural, recreational and entertainment uses

Schedules 1 and 1c of the MOP designates Royal Windsor Drive as a *Corridor*. Policy 5.4.4 of the MOP provides that *development on Corridors should be compact, mixed use and transit friendly and appropriate to the context of the surrounding Neighbourhood and Employment Area*. Section 4.2 – Historical Context of the MOP provides that *the primary function of major roads became the rapid movement of cars and trucks...[that] many primary corridors became unfriendly environments for pedestrians and cyclists. Gradually, community designs focused on separating cars and noise from people*.

The Clarkson GO MTSA Area is provided the opportunity to align with provincial policy, including supporting a modern economy and definition of *employment areas* and employment uses.

Planning Opinion

Major Transit Station Areas are areas of the province and the City of Mississauga that should fully realize transit infrastructure and the benefits of compact and sustainable development. MTSA's provide opportunity for intensification and the provision of a range of land uses that meet the demand of current and future residents. Land use designations within a MTSA should reflect the opportunity for intensification of for a mix of residential, office and retail-commercial uses.

The Draft Master Plan does not implement PPS 2024. More specifically, the proposed employment land use designation for the Subject Lands within the Draft Master Plan does not fully meet the general intent of the MTSA, which would provide for intensification.

The *Planning Act* and Provincial Planning Statement 2024 ('**PPS 2024**') redefined *areas of employment* and *employment areas* to exclude lands that provide for institutional and commercial uses, such as retail and office uses. In our view, it is not appropriate to extend the Employment designation to non-employment areas.

The policies in PPS 2024 require that Official Plan documents be brought into conformity with the PPS 2024. The Employment designations under the Draft Master Plan fail to meet the standard of consistency with standards established within provincial policy. On this basis, the Draft Master Plan needs to be evaluated.

We request that the City of Mississauga provide a wider range of uses for the Subject Lands including residential and other commercial uses within a Mixed-Use Areas designation in the Clarkson GO MTSA policy framework. The proposed land use planning policy framework risks sterilizing the lands within the proposed Employment designation.

It is our opinion that a more nuanced approach to the transition between employment lands and other uses is needed, one that allows for flexibility and recognizes the dynamic nature of today's economy is required.

Conclusion

MTSAs present a critical opportunity to create vibrant, transit-supportive hubs that can accommodate a mix of housing, employment, and services. The landowner is planning for a mixed residential, office and commercial development that can be serviced by the existing and planned infrastructure within the MTSA.

The landowner is committed to engaging with the municipality and other stakeholders in an open, positive, and collaborative manner to ensure that any proposed designations consider the long-term vision for the area. The landowner is planning to submit a pre-application consultation request to the City of Mississauga in the near future and looks forward to reviewing the Draft Official Plan policies that are planned to be released in 2025.

We thank you for providing us the opportunity to submit comments on the Draft Clarkson GO MTSA Master Plan. Should you have any questions, please contact the undersigned.

Respectfully submitted,
Innovative Planning Solutions

A handwritten signature in cursive script that reads "Mathew Halo".

Mathew Halo, MCIP, RPP
Associate

c. Client



INNOVATIVE PLANNING SOLUTIONS

planners • project managers • land development

March 21, 2024

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

Attention: **Amina Menkad, Project Lead**
Ben Phillips, Project Manager
City of Mississauga
official.plan@mississauga.ca

Re: **Mississauga's Official Plan Review**
Item 6.5 – Public Meeting (All Wards)
March 24, 2025, Planning and Development Committee (PDC)
2175 Royal Windsor Drive
City of Mississauga

Innovative Planning Solutions Inc. ('**IPS**') is the planning consultant for the landowners of 2175 Royal Windsor Drive, in the City of Mississauga (herein known as the '**Subject Lands**'). This letter provides commentary on the Draft Mississauga Official Plan, File CD.02-MIS and Item 6.5 on the Planning and Development Committee dated March 24, 2025. We request that Staff review and consider this letter and the requested modifications prior to Council's endorsement and approval of the Mississauga Official Plan. We understand that the final approval authority is the Minister of Municipal Affairs and Housing per O. Reg. 525/97.

We submitted a letter and made deputation at the December 9, 2024, Planning and Development Committee on Item 6.2 as it related to *Recommendation Report (Ward 2) Clarkson GO Major Transit Station – Master Plan*. The Subject Lands are currently envisioned under the Draft Clarkson GO Major Transit Station (MTSA) – Master Plan ('**Draft Master Plan**') as *Employment Area – Business* in Map 9 – Concept Plan of the September 2024 Draft MTSA document.

At the December 9, 2024, PDC, Council expressed the following considerations regarding the Draft Master Plan:

- Concern with the recommendations in the Staff Report entitled CD.21-CLA, dated November 20, 2024, requesting that Staff endorse the Draft Master Plan, and that Staff

prepare Official Plan policies for the Clarkson GO MTSA addressing land uses, transportation, community service and parkland and urban design.

- That Staff explore the opportunity to expand the vision for the future of the MTSA to allow more development and that an amendment to expand the mixed use area to capture the planned nature of the MTSA, subject to site-specific applications demonstrating land use compatibility.
- Further review of the land use compatibility components associated with the MTSA, and employment land uses outside of the MTSA within the Southdown Employment Area.
- Councillor Tedjo put forward a motion to refer Staff to review comments received at the meeting and report back to Council at a future meeting. It is understood that the Motion was intended to determine if the Mixed Use Area Designation and the Clarkson Village Community Node Boundary could be contemplated to be expanded to include the remainder of the lands within the *Clarkson MTSA Boundary*.

Based on our engagement with planning and policy Staff at the City of Mississauga, it is our understanding that Staff intend to release an updated version of the Draft Master Plan for Council consideration and endorsement following the finalization of the Mississauga Official Plan. It is our opinion that prior to the finalization of the Mississauga Official Plan Review process that Staff review and consider the opportunities in the long-range planning exercise for the Clarkson GO MTSA exercise and modify the Draft Master Plan to reflect the planned context as contemplated by the Province of Ontario in PPS 2024.

While it is acknowledged that the City of Mississauga enacted and passed By-law 0187-2024 adopting Official Plan Amendment No. 182, which updated the ROP and MOP to be consistent with and not conflict with the policy direction in PPS 2024 as it relates to the definition of “area of employment”, it is our opinion that the Subject Lands should not be considered to be within an area of employment on the basis that the existing use of the lands is **not an employment use, rather the automotive service use is a commercial use**. Under the *Planning Act* and PPS 2024, commercial uses are not employment and as such the Subject Lands ought not to be categorized as an area of employment. We acknowledge that OPA 182 grandfathers land use permissions for the legal non-conforming operation of commercial land uses within an area designated under the Mississauga Official Plan as an *Employment Area*. We understand that OPA 182 is currently under appeal at the OLT.

Notwithstanding OPA 182’s intent it is our opinion that it is not the intent of PPS 2024 to preserve current uses previously defined as employment to remain within an employment area within municipal land use plans, rather, it is the PPS’s intent to determine what land uses are considered employment versus non-employment and require municipalities to *protect and plan for*

employment areas. As identified above, it is our opinion that the Subject Lands are uniquely located in a mixed area with frequent and higher-order transit services, and that in order to be consistent with and conform to provincial policy, that the Subject Lands and the other lands current designated *Business Employment* in the Draft MOP be considered for re-designation to a *Mixed Use Limited* designation through the Clarkson GO MTSA Master Planning exercise, and that this consideration be reflected in future directions of the Mississauga OPR process.

The Provincial Planning Statement, 2024 (**‘PPS 2024’**) replaces Provincial Policy Statement, 2020 (**‘PPS 2020’**) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (**‘The Growth Plan’**) on October 20, 2024. PPS 2024 provides a modified provincial policy / planning framework for employment areas that seeks to create distinct parameters for defining employment areas.

Employment Area under PPS 2024 means:

*...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. (Emphasis Added)***

Based on the definition of Employment Areas in PPS 2024, the existing uses on the Subject Lands are not categorized as employment; therefore, the lands are not in an Employment Area or within an area of employment.

The policy framework under Section 2.8.2 of PPS 2024 will lead to impress a re-evaluation of Employment Areas within a specific policy context that is aimed at a protecting and preserving employment uses.

Policy 2.8.2.1 provides that, Planning authorities shall plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.

Policy 2.8.2.2 provides that, Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.

As identified above, the Subject Lands do not contain employment uses based on the definition of Employment Areas under PPS 2024. Based on policies 2.8.2.1 and 2.8.2.2, we provide that the lands located outside of the Clarkson GO MTSA within the Southdown Employment Area will/should form part as part of an Employment Area per the definition in PPS 2024. The Subject Lands will not form part of an Employment Area based on the above-noted PPS 2024 policy framework.

Policy 2.8.2.3 of PPS 2024 provides that,

Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:

- a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;*
- b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*
- c) prohibiting retail and office uses that are not associated with the primary employment use;*
- d) prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and*
- e) including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.*

The re-definition of Employment Areas / areas of employment in PPS 2024 establishes distinct employment land uses that shall be protected and preserved, while planning for appropriate transition to adjacent non-employment areas and sensitive lands uses.

Policy 2.8.2.3 provides that it is requirement that planning authorities assess and update employment areas in official plans to ensure that land use designations are appropriate to the planned function of employment areas. There are distinctions in the definition of employment uses as identified in Policy 2.8.2.3 and in the definition of an Employment Area, which excludes commercial uses.

Policy 2.8.2.4 provides that; *Planning authorities shall assess, and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land*

use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas.

As identified above, the Subject Lands currently operate as a commercial use (an automotive service centre and a car rental office); therefore, the existing uses on the subject lands do not constitute employment lands under PPS 2024. Policy 2.8.2.4 requires the future amendment to the Official Plan to be initiated by the planning authority. The effect of this is two-fold in its consideration of future planning applications on the Subject Lands:

1. the removal of the employment designation under the Mississauga OP through a site-specific Official Plan Amendment Application; and,
2. the refinement of the Mississauga OP by the planning authority to provide for the presentation of employment lands and the Employment Area.

Policy 2.8.2.5 provides the following:

Planning authorities may remove lands from employment areas only where it has been demonstrated that:

- a) *there is an identified need for the removal and the land is not required for employment area uses over the long term;*
- b) *the proposed uses would not negatively impact the overall viability of the employment area by:*
 1. *avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;*
 2. *maintaining access to major goods movement facilities and corridors;*
- c) *existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and*
- d) *the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.*

Based on our review of the Employment Areas policy framework under PPS 2024, specifically Policy 2.8.2.5, it is our view that the Subject Lands and the remainder of the lands currently designated *Employment* under the MOP should be afforded through the MOP and Clarkson GO Draft Master Planning process to be re-designated to a mixed-use land use designation under the Mississauga OP without needing to undertake an employment conversion in order for the

Subject Lands and surrounding lands to realize their planned densities in the Mississauga OP associated with the Clarkson GO MTSA.

It is our opinion that the PPS 2024’s definition of area of employment is not adequately addressed by the City of Mississauga in its current Draft of the MOP, as it relates to the Subject Lands and the Clarkson GO MTSA, specifically, in its regard to planning for transit-supportive land uses and in realizing the planned context and infrastructure investments made by the province, region and local municipality. We request that the City of Mississauga revisit the Draft MOP, and the Clarkson GO MTSA framework in association with providing for intensification and higher-density mixed uses in a compact built form within *Strategic Growth Areas*.

Conclusion

MTSAs present a critical opportunity to create vibrant, transit-supportive hubs that can accommodate a mix of uses. We request that the following be modified by the City of Mississauga:

- 1. Modify Schedule 7 to remove the Subject Lands from the *Employment Area* designation.**
- 2. Modify Schedule 8r to expand the *Growth Node* to include the Subject Lands.**
- 3. Modify the Clarkson GO MTSA Master Plan to include the Subject Lands and the areas identified in the attached mark-up to the Clarkson GO MTSA Draft Concept Plan to *Mixed Use Areas / Mixed Use Limited* designation.**

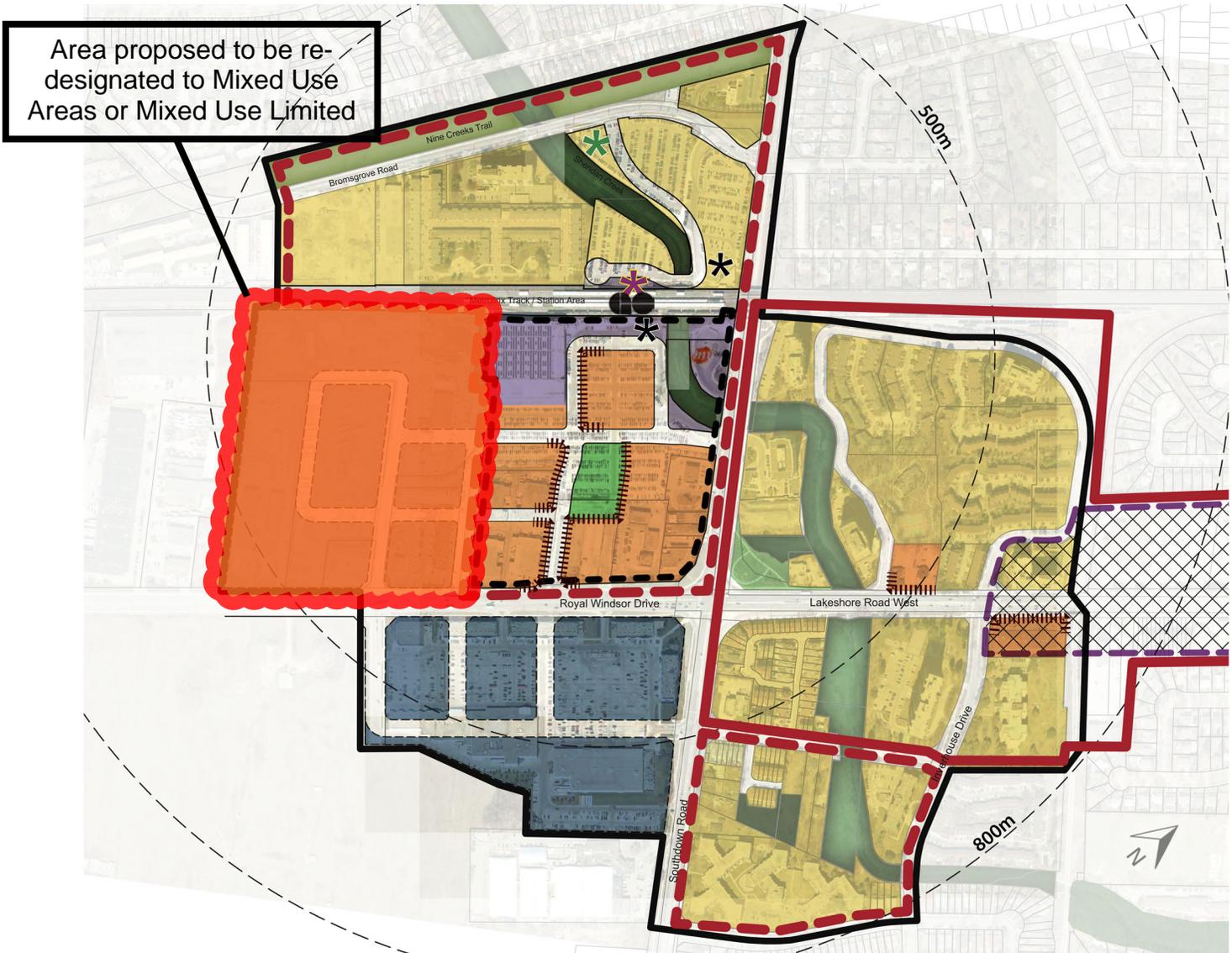
The landowner is committed to engaging with the municipality and other stakeholders in an open, positive, and collaborative manner to ensure that any proposed designations consider the long-term vision for the area. We thank you for providing us the opportunity to submit comments on the Mississauga Official Plan and Draft Clarkson GO MTSA Master Plan. Should you have any questions, please contact the undersigned.

Respectfully submitted,
Innovative Planning Solutions



Mathew Halo, MCIP, RPP
Associate

mhalo@ipsconsultinginc.com / Ext. 41



MAP 9 - CONCEPT PLAN

LAND AREA	
MTSA Total Land Area	82 ha.
POPULATION	
Existing (2021 Census)	4,080
New	11,120
Total Population	15,200
EMPLOYMENT	
Existing (2022 Mississauga Employment Database)	1,850
New Commercial	560
New Office	380
Minus Existing	90
Total Jobs	2,400
DENSITY	
Existing	72 Persons + Jobs per Hectare
Future*	215 Persons + Jobs per Hectare

* Future density assumes full build out of sites identified in the Demonstration Plan (Map 14).

LEGEND

- Clarkson MTSA Boundary
- Residential Area
- Mixed Use Area
- Employment Area - Business
- Employment Area - Commercial
- Transit Facility (GO/MiWay)
- Natural System
- Utility Corridor/ Nine Creeks Trail
- Existing Park
- New Park
- Existing Clarkson Village Community Node
- Proposed Clarkson Village Community Node Boundary Expansion
- Clarkson Village Main Street Commercial Area
- Non-residential Uses At-grade
- Future Park
- Potential Pick-Up / Drop-Off Location
- Potential Station Plaza
- Lands to be Removed from Employment Area
- GO Transit
- Mississauga Transit



INNOVATIVE PLANNING SOLUTIONS

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December 6, 2024

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

Attention: Andrew Whittemore, M.U.R.P., Commission of Planning and Building

Re: Planning and Development Committee – Item 6.2
Clarkson GO Major Transit Station Area (MTSA) – Master Plan
City File: CD.21-CLA
2175 Royal Windsor Drive
City of Mississauga

Innovative Planning Solutions Inc. ('IPS') is the planning consultant for the landowners of 2175 Royal Windsor Drive, in the City of Mississauga (herein known as the '**Subject Lands**'). This letter is submitted to Planning and Development Committee in relation to Item 6.2 on the December 9, 2024, Agenda, *Recommendation Report (Ward 2) Clarkson GO Major Transit Station – Master Plan*.

The Subject Lands are currently envisioned under the Draft Clarkson GO Major Transit Station (MTSA) – Master Plan ('**Draft Master Plan**') as *Employment Area – Business* in Map 9 – Concept Plan of the September 2024 Draft MTSA document.

This letter identifies that the proposed lands use planning framework for the Clarkson GO MTSA is not consistent with the Provincial Planning Statement 2024 ('**PPS 2024**') and requests that the City of Mississauga reconsider the effect of the land use strategy for the Subject Lands providing for a broader range and intensification of land uses.

Framing the Subject Lands

The Subject Lands are located on the **north** side of Royal Windsor Drive and are occupied by an L-shaped building with 1 and 2 storey components, at-grade parking and automotive mechanic and car rental uses. The Subject Lands maintain a singular vehicular access on Royal Windsor Drive and maintain frontage on Royal Windsor

Drive and a city-owned unnamed road, which provides vehicular access from Royal Windsor Drive to the city's Clarkson Yard, the commercial plaza at 2157 Royal Windsor Drive and the Clarkson GO Station Lands. Southeast of the Subject Lands is the Clarkson Crossing Shopping Centre.

Section 1.4 of the September 2024 Master Plan document provides that ***within the Clarkson GO MTSA, the lands south of Royal Windsor Drive and west of Southdown Road, form part of the Southdown Employment Area...is home to several large-scale industrial users...[and] is made up of heavy and light industrial, mixed commercial, and open space users.***

Map 5 in the Draft Master Plan identifies the Subject Lands as General Retail Commercial lands and indicates other General Retail Commercial along Royal Windsor Drive. Inclusive of the Subject Lands, it can be observed that approximately 450-metres of Royal Windsor Drive (north and south) are lands that are identified as General Retail Commercial lands and one lot (2133 Royal Windsor Drive) as Industrial and Commercial Multiples.

The Subject Lands are located within the Clarkson GO MTSA Area and are designated as *Business Employment* in the City of Mississauga Official Plan ('**MOP**'). The Draft Clarkson GO MTSA Master Plan proposes that the Subject Lands maintain its Employment designation under the MOP and seeks to designate them as *Employment Area – Business* (per Map 9 – Concept Plan in the Draft Master Plan).

Section 2 of the Draft Master Plan provides that,

- *A mix of uses is encouraged throughout the MTSA...with the highest density development adjacent to the Clarkson GO Transit Station to create vibrant and active nodes north and south of the rail corridor.*
- *Notwithstanding the permitted uses within the 'Mixed-Use' Area, proposed development may be subject to the completion of a land use compatibility analysis where appropriate, among other studies, to the satisfaction of the City.*
- *Employment uses are encouraged throughout the MTSA. Within the Clarkson MTSA, the Employment Area should have a mix of employment generating land uses and contribute to the Pedestrian Realm / Active Transportation Network.*
- *In the Employment Area, the following uses shall continue to be permitted:*
 - *Offices, Financial institutions, Research and development facilities, Commercial schools, Retail stores, restaurants and personal service uses,*

Hotels, Conference/convention centres, Banquet facilities, and Cultural, recreational and entertainment uses

Schedules 1 and 1c of the MOP designates Royal Windsor Drive as a *Corridor*. Policy 5.4.4 of the MOP provides that *development on Corridors should be compact, mixed use and transit friendly and appropriate to the context of the surrounding Neighbourhood and Employment Area*. Section 4.2 – Historical Context of the MOP provides that *the primary function of major roads became the rapid movement of cars and trucks...[that] many primary corridors became unfriendly environments for pedestrians and cyclists. Gradually, community designs focused on separating cars and noise from people*.

The Clarkson GO MTSA Area is provided the opportunity to align with provincial policy, including supporting a modern economy and definition of *employment areas* and employment uses.

Planning Opinion

Major Transit Station Areas are areas of the province and the City of Mississauga that should fully realize transit infrastructure and the benefits of compact and sustainable development. MTSA's provide opportunity for intensification and the provision of a range of land uses that meet the demand of current and future residents. Land use designations within a MTSA should reflect the opportunity for intensification of for a mix of residential, office and retail-commercial uses.

The Draft Master Plan does not implement PPS 2024. More specifically, the proposed employment land use designation for the Subject Lands within the Draft Master Plan does not fully meet the general intent of the MTSA, which would provide for intensification.

The *Planning Act* and Provincial Planning Statement 2024 ('**PPS 2024**') redefined *areas of employment* and *employment areas* to exclude lands that provide for institutional and commercial uses, such as retail and office uses. In our view, it is not appropriate to extend the Employment designation to non-employment areas.

The policies in PPS 2024 require that Official Plan documents be brought into conformity with the PPS 2024. The Employment designations under the Draft Master Plan fail to meet the standard of consistency with standards established within provincial policy. On this basis, the Draft Master Plan needs to be evaluated.

We request that the City of Mississauga provide a wider range of uses for the Subject Lands including residential and other commercial uses within a Mixed-Use Areas designation in the Clarkston GO MTSA policy framework. The proposed land use planning policy framework risks sterilizing the lands within the proposed Employment designation.

It is our opinion that a more nuanced approach to the transition between employment lands and other uses is needed, one that allows for flexibility and recognizes the dynamic nature of today's economy is required.

Conclusion

MTSAs present a critical opportunity to create vibrant, transit-supportive hubs that can accommodate a mix of housing, employment, and services. The landowner is planning for a mixed residential, office and commercial development that can be serviced by the existing and planned infrastructure within the MTSA.

The landowner is committed to engaging with the municipality and other stakeholders in an open, positive, and collaborative manner to ensure that any proposed designations consider the long-term vision for the area. The landowner is planning to submit a pre-application consultation request to the City of Mississauga in the near future and looks forward to reviewing the Draft Official Plan policies that are planned to be released in 2025.

We thank you for providing us the opportunity to submit comments on the Draft Clarkson GO MTSA Master Plan. Should you have any questions, please contact the undersigned.

Respectfully submitted,
Innovative Planning Solutions

A handwritten signature in cursive script that reads "Mathew Halo".

Mathew Halo, MCIP, RPP
Associate

c. Client