

July 22, 2025

MGP File: 25-3468

Ministry of Municipal Affairs and Housing
Municipal Services Division – Central Ontario
777 Bay Street, 13th Floor Toronto, ON M5G 2E5

via email: Jennifer.le@ontario.ca

Attention: Jennifer Le

Dear Ms. Le:

**RE: Comments on Mississauga Official Plan
 ERO File No. 025-0468
 2935 & 2955 Mississauga Road, Mississauga**

1.0 Introduction

Malone Given Parsons Ltd. (“MGP”) has been retained by 590816 Ontario Inc. (“Owner”) to undertake a review of the newly adopted Mississauga Official Plan (“Mississauga OP”) as it relates to the Owner’s landholdings at 2935 & 2955 Mississauga Road, located at the southeast corner of Mississauga Road and Dundas Street West (“Subject Lands”). While Official Plan Amendment and Zoning By-law Amendment applications were submitted to the City in 2022 (File No. OZ/OPA 22-6 W8) by a previous planning consultant, MGP has since been engaged to provide updated planning advice and to advance the development approvals. The Owner, along with their consulting team, has been actively working with City Staff through the development review process.

The Subject Lands are located along Mississauga Road and in close proximity to Dundas Street West, the latter of which is identified as a higher-order transit corridor in the adopted Mississauga OP and forms part of the broader regional transit network. This corridor is planned for the upcoming Dundas Bus Rapid Transit (“BRT”) line, one of the critical transit projects for the City and the Region of Peel, which has been funded jointly by all levels of government. In March 2022, the Province of Ontario committed approximately \$225.9 million toward integrated transit initiatives in Mississauga, with roughly \$101.8 million directly allocated to the Dundas BRT line. This historic investment underscores the Province’s dedication to enhancing regional transit infrastructure along this corridor.

The Subject Lands are located approximately 800 metres, or about a 15-minute walk, from the planned BRT station at the University of Toronto Mississauga (“UTM”) campus. While the exact location of the future stop has not been finalized, it is expected to be situated near the existing UTM bus loop, making this a reasonable and conservative estimate. This locates the Subject Lands well within the typical catchment area for inclusion within a Major Transit

Station Area (“MTSA”) based on the definition within the Provincial Planning Statement 2024 (“PPS 2024”).

Although the Subject Lands are currently designated as Greenlands with a Hazard Overlay in the newly adopted Mississauga OP, through the active development application, a full suite of technical studies has been prepared which demonstrates that a significant portion of the site is outside the floodplain (and other environmental features) and is suitable for urban development. These findings confirm that the Subject Lands can accommodate development while protecting the key natural heritage features.

The Owner is planning to optimize development in proximity to planned higher-order transit and is proposing a mid-rise development that is compatible with the surrounding built form and planned context. Due to the aforementioned investment in transit in the immediate area, the Subject Lands represent a prime opportunity to locate a well-designed mid-rise building that directly supports this investment and contributes to the City’s intensification and housing objectives. As one of the last remaining privately-owned vacant properties that can accommodate significant development within walking distance of the planned UTM BRT higher-order transit station, the Subject Lands represent a critical opportunity to support intensification along the Dundas Street corridor.

Given the Subject Lands’ strategic location along a higher-order transit corridor, the substantial public investment in the Dundas BRT, and the demonstrated development potential supported by comprehensive technical studies, it is our opinion that the current Greenlands designation with Hazard Overlay does not represent good planning and is not an appropriate designation for the Subject Lands.

As such, we request that the designation for the developable portion of the Subject Lands be modified to permit urban development (Residential Mid-Rise with a site-specific exception for height), and be included within the UTM Protected Major Transit Station Area (PMTSA) in order to deliver much-needed housing in a highly accessible location.

1.1 Subject Lands and Surrounding Context

The Subject Lands are comprised of two parcels, located at 2935 and 2955 Mississauga Road, and are approximately 2.1 hectares in size. As shown in Figure 1 and legally described in Table 1, the lands are situated at the southeast corner of Mississauga Road and Dundas Street West. The site is within 800 metres (approximately a 15-minute walk) of the planned UTM station along the Dundas BRT route. The Subject Lands are also located within walking distance of the planned Erin Mills BRT Station to the west.

Figure 1: Location of Subject Lands



The Subject Lands are currently vacant and are bounded by both the Credit River to the north and a tributary referred to as Sawmill Creek to the northwest. As part of the ongoing development application, detailed environmental, hydrogeological, and floodplain studies have confirmed that a substantial portion of the lands are located outside of natural hazard areas and is suitable for urban development.

The lands have frontage along Mississauga Road and are in close proximity to the Dundas Street West frontage, which is planned for future improvements to support the Dundas BRT. The broader area contains a variety of community services and amenities, including UTM campus, schools, parks, retail, and existing residential neighbourhoods, all within walking or cycling distance of the Subject Lands.

The Subject Lands, given their size, location, and proximity to transit, represent a rare infill opportunity in this neighbourhood to deliver a mid-rise development that is compatible with the evolving context and policy direction for the area.

Table 1: Legal Description of Subject Lands

#	Party To:	Legal Description	Municipal Address	Area (ha)
1	590816 Ontario Inc.	PT LT 3 RANGE 1 SDS TORONTO; PT LT 4 RANGE 1 SDS TORONTO AS IN VS177606 CITY OF MISSISSAUGA	2935 Mississauga Road	2.1
2	590816 Ontario Inc.	PT LT 3 RANGE 1 SDS TORONTO RACEY TRACT, TORONTO TOWNSHIP AS IN RO1011104; S/T DEBTS IN RO827459 CITY OF MISSISSAUGA	2955 Mississauga Road	

The following summarizes the surrounding uses:

To the north:

- Credit River

To the west:

- Sawmill Creek
- Dundas Street West

To the south:

- Mississauga Road
- Low Density Residential

To the east:

- Low Density Residential

1.2 Transit Services

The Subject Lands are well served by existing local bus transit and are planned to be served by higher-order transit in the near future. MiWay Route 1/1C/101/101A provides east-west bus service along Dundas Street West, directly adjacent to the Subject Lands. These are some of Mississauga's busiest and most frequent routes, offering connections to key destinations including the Islington Subway Station (Line 2), Dixie GO Station, and key retail and institutional nodes across the city.

The Subject Lands are also within walking distance UTM campus, which serves as a key transit hub in the west end of the city. A number of MiWay routes are located at the UTM campus, including Routes 1C, 44, 101, 101A, 110, and 126. These routes provide local and express service connections to major destinations such as Islington Subway Station (Line 2), South Common Centre, Clarkson GO Station, and central Mississauga.

In addition to existing service, the Subject Lands are located along the future Dundas BRT corridor, a provincially funded higher-order transit project that will deliver fast, reliable, and high-capacity service along Dundas Street.

Together, the combination of existing high-usage service and planned higher-order transit infrastructure makes the Subject Lands an ideal location for transit-supportive development and intensification in accordance with provincial and municipal policy objectives.

1.3 Application History

Applications for an Official Plan Amendment and Zoning By-law Amendment were submitted to the City of Mississauga in March 2022 to facilitate the redevelopment of the Subject Lands with a transit-supportive and mid-rise residential development. The proposed development

consists of a 12-storey condominium building proximate to Dundas Street West, which tapers to 7 storeys on the eastern wing. Along the eastern edge of the site, the proposal includes a 3-storey stacked townhouse building to ensure compatibility with the adjacent low-rise neighbourhood. The building is set back sufficiently from Mississauga Road to allow for the implementation of a comprehensive landscape and restoration planting plan, which will ensure that the scenic character of Mississauga Road is maintained and enhanced. This setback, combined with high-quality landscape design, supports the City's intent to preserve the visual and natural character of this important corridor while accommodating transit-supportive growth.

The original submission proposed 196 condominium units and 20 townhouse units. The current, refined proposal maintains 196 condominium units while reducing the townhouse component to 15 units, which was in part done to address comments received from City staff and technical agencies related to the development limits. The development also includes three levels of underground parking, designed to minimize surface parking and support compact built form. Given the Subject Land's proximity to existing and planned higher-order transit, including the future Dundas BRT, the provision of underground parking ensures that the development supports sustainable mobility objectives while respecting the environmental constraints of the site.

The Subject Lands are adjacent to the Credit River valley and associated floodplain, as well as a woodland feature. As part of the application, a comprehensive suite of technical studies was prepared by the consultant team to delineate the developable area and ensure the protection of natural heritage and hazard features. As it relates to the environmental work undertaken, these studies include:

- 2D Hydraulic Assessment
- Geomorphic Assessment
- Slope Stability Analysis
- Environmental Impact Study (EIS)

These studies demonstrate that the proposed redevelopment is located entirely outside of the regulated floodplain, the woodland feature, and the associated vegetation protection zone (VPZ). In addition, safe pedestrian and vehicular access is provided for the proposed driveway and underground parking structure, which addresses the applications' municipal and provincial safe access and floodproofing requirements.

Our consulting team is currently preparing a third submission, which will address the remaining minor comments related to environmental and engineering matters. This revised submission is anticipated to be submitted to the City by August 2025.

2.0 Comments on Adopted Mississauga Official Plan

The PPS 2024 came into effect on October 20, 2024 and provides the Province's policy direction on land use planning and development. Under the *Planning Act*, all municipal planning decisions must be "consistent with" the PPS 2024. The PPS 2024 promotes efficient development patterns, compact built form, and transit-supportive growth, particularly within settlement areas and around MTSAs.

Policies 2.3.1.1 and 2.4.1.1 direct growth and intensification to strategic growth areas, including MTSA, and call for land use patterns that support active transportation, optimize infrastructure, and accommodate a significant share of population and employment growth. The PPS 2024 also emphasizes the need to make the most of public investment in infrastructure by aligning land use decisions with planned higher order transit.

In our opinion, the adopted Mississauga OP is inconsistent with the PPS 2024 in the following areas:

- 1) It does not recognize that the Subject Lands meet the definition of a MTSA under the PPS 2024;
- 2) it does not maximize the number of potential transit users within walking distance of the MTSA; and,
- 3) it does not optimize intensification opportunities in close proximity to a rapid transit corridor/station that leverages infrastructure investments.

The Subject Lands represents a prime opportunity to locate a mid-rise building to support the public investment in transit. Prohibiting development on this site would be a lost opportunity to fully realize its potential and is contrary to direction received from the Province concerning the appropriate location for higher density development.

2.1 The Mississauga OP does not recognize the Subject Lands within a PMTSA

The PPS 2024 defines a MTSA as:

“the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800-metre radius of a transit station.”

The Subject Lands are located within 800 metres of the planned Dundas BRT station at the UTM campus (as shown earlier on Figure 1). While the exact location of the BRT stop has not been finalized, this estimate is based on the existing UTM bus loop, which is expected to form part of the future station infrastructure. Using this location provides a reasonable and conservative basis for assessing the Subject Lands' relationship to the planned station. The Subject Lands are also within walking distance of a second planned BRT stop to the west, further reinforcing its transit-supportive location.

Despite meeting the locational criteria for an MTSA under the PPS 2024, the Subject Lands were not included within the PMTSA boundary identified by the City around the UTM station. This contrasts with lands along The Collegeway, which were included within the PMTSA despite being located further walking distance from the planned UTM station due to the meandering nature of the road network in that area. The Subject Lands offer a more direct and accessible connection to the future station and represent one of the last remaining privately-owned opportunities to accommodate transit-supportive intensification in this area.

Given the proximity of the Subject Lands to two planned higher order transit stations, and the technical work completed through the ongoing development application confirming that the

site is suitable for development, the exclusion of the Subject Lands does not represent an appropriate implementation of the MTSA definition as set out in the PPS 2024. Their exclusion undermines the ability to achieve the density targets and overall planning objectives for the MTSA in a manner that is consistent with provincial policy direction.

In our opinion, the Subject Lands meet the PPS 2024 definition of a MTSA and should be included within the UTM PMTSA as part of the new Mississauga OP. Including the lands would align with provincial policy direction, optimize the use of planned transit infrastructure, and help the City advance its intensification and housing objectives in a strategic and appropriate location.

2.2 The Mississauga OP does not maximize the number of potential transit users within walking distance of the MTSA

The delineation of the UTM PMTSA boundary to include only the UTM campus and higher-density development along The Collegeway effectively limits the area where intensification is planned. This reflects an inherent policy decision to protect surrounding low-density residential neighbourhoods by excluding them from the MTSA, rather than planning comprehensively for the full 800-metre radius around the station as contemplated by the PPS 2024. As a result, the developable land area within the PMTSA boundary is significantly constrained, and much of it is already built out at modest densities.

The City has requested a minimum density target of 50 residents and jobs per hectare for the UTM PMTSA, which is significantly below the 160 residents and jobs per hectare required by the Province for areas served by BRT. This reduced target reflects the limited availability of developable land within the currently delineated PMTSA boundary. The developable land area within the PMTSA is only 97 hectares, approximately half of the 200-hectare area typically associated with an 800-metre radius. At the City's proposed target, the PMTSA would yield only 4,850 people and jobs, a small fraction of the 32,000 people and jobs the Province anticipates within a standard MTSA catchment (200 ha × 160 p+j/ha). Even if commuting UTM students were factored in, the MTSA would still fall well short of what is needed to support the investment in the Dundas BRT.

MGP has undertaken a preliminary analysis of the redevelopment potential of properties within the current PMTSA boundary. Based on that analysis, the area, as currently delineated, would achieve a total density of approximately 62 people and jobs per hectare, exceeding the City's proposed minimum target of 50 people and jobs per hectare. This suggests that the City is not planning for any meaningful increase in density within the PMTSA, which is inconsistent with the objective of concentrating growth around higher-order transit. If the Subject Lands were included and developed as proposed, the PMTSA could achieve an improved density of approximately 67 people and jobs per hectare. While it will likely not be possible to fully achieve the provincial target given the site-specific constraints of this area, intensifying appropriate and underutilized sites, such as the Subject Lands, is essential to moving closer to conformity with the PPS 2024. Restricting development on this site would be a lost opportunity to fully realize the potential of the assembled parcels, directly limits the number of future transit users within walking distance of the station and undermines the effectiveness

of the PMTSA boundary, and is contrary to direction received from the Province concerning the appropriate location for high-density development.

The UTM PMTSA is unique given its location that includes a large sprawling university campus and significant environmental lands. The UTM campus generates a high volume of daily transit activity through its approximately 16,000 undergraduate and graduate students (and faculty). Assuming approximately 10% live on campus (which is the approximate size of the student residences), roughly 14,500 students are commuting potentially daily to and from the site, creating significant transit demand. While the student population is not counted towards the Province's minimum density target, which is based solely on permanent residents and jobs, we recognize it's a large driver of transit usage. However, even if students were factored into the density calculation, the existing and planned density within the PMTSA would still fall short of what is appropriate to support the planned Dundas BRT investment. This underscores the need to expand the boundary and plan for greater intensification on sites like the Subject Lands that are capable of accommodating additional residents and jobs within walking distance of the station.

At a minimum, the PMTSA boundary should be revised to include the Subject Lands, which are located within 800 metres of the planned UTM station and are not affected by natural heritage or hazard constraints. Planning for intensification in areas that are suitable for redevelopment is critical to maximizing the number of people and jobs within walking distance of the station and to achieving the overall objectives of the PPS 2024.

As currently adopted, the Mississauga OP fails to maximize the number of potential transit users within walking distance of the planned UTM station, which is a requirement of both the MTSA policies and the broader objectives of the PPS 2024.

2.3 The Mississauga OP does not optimize intensification opportunities in close proximity to a rapid transit corridor/station that leverages infrastructure investments

The Mississauga OP, as adopted, does not optimize intensification opportunities in proximity to the planned Dundas Bus Rapid Transit (BRT) corridor, specifically as it relates to the future station at the UTM campus. This is inconsistent with the policy direction of the PPS 2024, which requires municipalities to direct growth to locations that are well-served by infrastructure and higher-order transit.

Policy 2.3.1.2 of the PPS states that land use patterns within settlement areas shall be based on a mix of land uses and densities that:

- *“optimize the use of land and resources;”*
- *“support active transportation;” and*
- *“are transit-supportive.”*

Additionally, Policy 2.4.1.2 encourages the identification of strategic growth areas that accommodate significant population and employment growth, support the transit network, and enable the achievement of complete communities.

The Dundas corridor is planned for the Dundas BRT line, supported by a significant investment from the Province, including over \$100 million specifically allocated to the Dundas BRT. This investment reinforces the Province's intent to focus growth along key transit corridors and to leverage infrastructure to support housing and intensification objectives.

Despite this significant public investment, the Mississauga OP fails to direct new development to the area around the UTM station (including the Subject Lands). The City has requested a minimum density target of only 50 people and jobs per hectare for the UTM PMTSA, which is well below the 160 people and jobs per hectare required by the Province for BRT Stations. This figure is lower than the current estimated density of 62 people and jobs per hectare within the PMTSA, meaning that the City is effectively planning for no new growth. As a result, the City is not envisioning any new residents or jobs despite major infrastructure funding from all levels of government. This contradicts the purpose and intent of identifying PMTSAs with associated density targets and fails to leverage the infrastructure to generate additional transit ridership, tax base growth, or housing supply.

The Subject Lands are located within 800 metres of the planned UTM BRT station. The current Greenlands designation with Hazard Overlay, coupled with the exclusion of the Subject Lands from the PMTSA boundary, fails to acknowledge the substantial technical work undertaken to confirm the developable area of the site and its suitability for urban development. These proposed designations do not reflect the physical reality of the site, nor do they align with the Province's vision for strategic intensification around higher-order transit infrastructure.

The Subject Lands are one of the last remaining privately-owned, unconstrained site in this segment of the corridor with direct access to existing municipal services and proximity to two planned BRT stations. Restricting redevelopment here undermines the opportunity to optimize infrastructure investments and intensify in a location that minimizes disruption to surrounding low-density neighbourhoods. It also increases the risk that growth pressure will be redirected to less appropriate locations.

Policy 2.1.1 of the PPS also emphasizes that growth should be directed in a manner that "makes efficient use of existing and planned infrastructure." The Subject Lands are already serviced and well-suited to accommodate additional residents and jobs in support of planned transit infrastructure. Excluding them from redevelopment consideration contradicts this directive and represents a missed opportunity to plan comprehensively for infrastructure-supported growth.

Including the Subject Lands within the PMTSA boundary would not only provide a suitable location for mid-rise, compact intensification, but would also optimize and directly leverage the significant public investment in the Dundas BRT.

3.0 Conclusion

In our opinion, the adopted Mississauga OP is not consistent with the PPS 2024 as it relates to the delineation of the UTM PMTSA, maximizing the amount of transit users within walking distance of a higher order transit station, and the optimization of planned transit infrastructure. The exclusion of the Subject Lands from the PMTSA boundary and their designation as Greenlands with a Hazard Overlay fails to recognize their proximity to two

planned higher order transit stations, their demonstrated development potential, and the strategic opportunity they present to support the Province's and City's intensification, housing, and infrastructure objectives. The PPS 2024 directs growth to locations that optimize the use of land and infrastructure, and the Subject Lands are ideally suited to deliver compact, transit-supportive development that aligns with this direction.

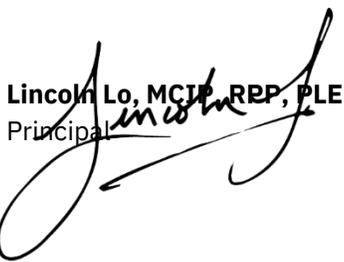
For the reasons outlined in this letter, we respectfully request that the Province modify the adopted Mississauga Official Plan to:

1. Redesignate the developable portion of the Subject Lands from Greenlands to Residential Mid-Rise with a site-specific exception for height; and
2. Include the Subject Lands within the delineated UTM Protected Major Transit Station Area (PMTSA) boundary.

These changes are necessary to ensure the Mississauga OP is consistent with the PPS 2024 and to enable an appropriate form of development on the Subject Lands that supports provincial, regional and local planning priorities.

Should you have any questions or wish to discuss these comments further, please do not hesitate to contact the undersigned.

Yours very truly,
Malone Given Parsons Ltd.


Lincoln Lo, MCIP, RPP, PLE
Principal