

July 25, 2025

GSAI File: 236-002

(Via Email)

Hon. Robert Flack

Ministry of Municipal Affairs and Housing

777 Bay Street

Toronto, ON M7A 2J3

**RE: Mississauga Official Plan 2051  
Camilla Towns Inc.  
2040 Camilla Road, City of Mississauga  
ERO No.: ERO #0250465**

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Glen Schnarr and Associates Inc. (GSAI) are the planning consultants to Camilla Towns Inc. (the "Owner") of the lands municipally known as 2040 Camilla Road, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are pleased to provide this Comment Letter regarding the Council adopted Mississauga Official Plan 2051, currently under review by the Ministry.

As background, GSAI participated in the Mississauga Official Plan Review initiative ("OP Review initiative") as well as various related City initiatives and provided various Comment Letters identifying areas of concern with the Mississauga Official Plan 2051. A copy of this previous Comment Letter, expressing a range of concerns, is provided in Appendix II of this Letter. As further outlined in this previous Comment Letter and expanded upon in the detailed rationale for requested changes presented in Appendix I of this Letter, we believe there are outstanding concerns with the Mississauga Official Plan 2051 and request the Ministry enact a number of modifications. For brevity, we request that the Ministry consider the following revisions:

- Remove the onerous built form-based policy framework and instead implement a broader, more flexible policy framework for guiding where and how development should occur; and,
- Ensure that as-of-right development permissions are not adversely impacts..

Further rationale to the above requests is provided in Appendix I of this Letter. In summary, we remain concerned with the Mississauga Official Plan 2051 and request that the Ministry consider our proposed modifications. Thank you for the opportunity to provide these comments. We wish to be informed of any future decision made.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Stephanie Matveeva, MCIP, RPP



cc. Jennifer Le, Ministry of Municipal Affairs and Housing  
Owner

## Appendix I / Rationale for Requested Modifications

As stated above, we have reviewed the Mississauga Official Plan 2051, as adopted by Mississauga Council in April 2025. Based on this review, we offer the following comments and rationale for the requested modifications identified above.

### *1. Built Form & Land Use*

The Mississauga Official Plan 2051 provides a refined, built form-based policy framework. This framework is first established in Chapter 8, Well Designed Healthy Communities which provides policy direction for matters related to built form, site design, building organization and more. The built form-based policy framework is then referenced and reinforced throughout the remaining land use and Character Area policies of the Official Plan. We remain concerned with the transition to a built-form based policy framework. In particular, we are concerned with the proposed land use designation framework based on built form which can serve to restrict development opportunities rather than fostering them. In particular, the built form-based policy framework is overly prescriptive, results in onerous policy criteria to be satisfied and elevates urban design guidance to policy.

Of relevance to the Subject Lands, the Official Plan contemplates re-designating the Site from 'Residential High Density' to 'Residential High-Rise'. This designation, should the built-form based policy framework be maintained, does not guarantee development permissions are transferred appropriately. We request that the Ministry ensure that as-of-right development permissions are not adversely impacted.

### *2. Built Form*

The Mississauga Official Plan 2051 provides a refine, built form-based policy framework. This framework is first established in Chapter 8, Well Designed Healthy Communities which provides policy direction for matters related to built form, site design, building organization and more. The built form-based policy framework is then referenced and reinforced throughout the remaining land use and Character Area policies of the Official Plan. We remain concerned with the transition to a built-form based policy framework. In particular, we are concerned with the proposed land use designation framework based on built form which can serve to restrict development opportunities rather than fostering them. In particular, the built form-based policy framework is overly prescriptive, results in onerous policy criteria to be satisfied and elevates urban design guidance to policy. For example, the general built form and site development policies contained in Chapter 8 of the Official Plan serve to restrict development opportunities, implement restrictive built form policies such as requiring that a built form relate to the right-of-way onto which it fronts, implements restrictive setback requirements, implements restrictive podium-tower requirements and also implements a restrictive minimum 30 metre tower separation as policy, whereas tower separation was formally outlined in the area-specific Built Form Standards. Given the above, we request that the elevation of urban design guidance to policy and the built-form based policy framework be reconsidered and eliminated to enable flexibility and high-quality built forms that effectively and appropriately respond to local conditions.

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



### Conclusion

In summary, we remain concerned about the policy directions outlined in the Mississauga Official Plan 2051 and continue to request that modifications be made.



Appendix II / Previous Comment Letters

March 15, 2024

GSAI File: 236 – 002

(Via Email)

Chairman and Members of the Planning and Development Committee

City of Mississauga

300 City Centre Drive

Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan 2051  
Camilla Towns Inc.  
2040 Camilla Road, City of Mississauga**

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Glen Schnarr and Associates Inc (GSAI) are the planning consultants to Camilla Towns Inc. (the "Owner") of the lands municipally known as 2040 Camilla Road, in the City of Mississauga (the 'Subject Lands' or 'Site'). On behalf of the Owner, and further to the Mississauga Official Plan Review Comment Letters, submitted by GSAI, dated June 23, 2023, July 31, 2023 and March 14, 2024, we are submitting this Comment Letter in relation to the ongoing Mississauga Official Plan Review initiative.

GSAI has been participating in the Mississauga Official Plan Review initiative ('OP Review initiative') as well as various related City initiatives. We understand that when complete, the City's OP Review initiative will culminate in a new draft Official Plan (the 'Mississauga Official Plan 2051') that will modify the policy framework permissions for lands across the City, including the Subject Lands.

The Subject Lands are located on the west side of Camilla Road, north of the North Service Road and south of the hydro corridor. The Site is currently vacant. Based on the in-effect planning policy framework, the Site is located within the Downtown Hospital Character Area, within the Downtown Mississauga Urban Growth Centre, within a Strategic Growth Area (in accordance with Schedule E-2, Strategic Growth Areas, Region of Peel Official Plan), within the North Service Major Transit Station Area (in accordance with Schedule E-5, Major Transit Station Areas, Region of Peel Official Plan), and is designated 'Residential High Density', with a Natural Hazards policy overlay (in accordance with Schedule 10, Land Use Designations, Mississauga Official Plan). Based on the above, the Site has recognized development potential.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate and desirable location for higher density, compact, transit-supportive development to occur. This is strengthened by the Site's locational characteristics of being within 300 metres of the Hazel McCallion Light Rail Transit ('LRT') network and various street-level transit services. Additionally, the Subject Lands are located within walking distance of various services, amenities, facilities, parks and greenspaces to meet the daily needs of residents and support Downtown Hospital as a vibrant, complete, 15-minute community.

By way of background, we highlight that the Subject Lands are subject to an active development approval. More specifically, the Site is subject to an active Site Plan Approval ('SPA') application (City File No. SP-19-50 W7) which will

further implement the development vision for the Site. Overall, the SPA application will facilitate the Site to be redeveloped for a compact, pedestrian-oriented development comprised of 148 3-storey, stacked, back-to-back townhouse dwellings, organized around five (5) development blocks.

We have reviewed the draft Mississauga Official Plan 2051, released on February 12, 2024, and offer the following comments.

Of relevance to the Subject Lands, the draft policies propose revisions to Chapters 3 (Directing New Development), 5 (Housing Choices), 8 (Well Designed Healthy Communities), 10 (Land Use Designations), 11 (Transit Communities), 12 (Urban Growth Centre), 16 (Special Sites) and select Schedules. We support the move to a modified policy framework to guide how growth is to be managed in accordance with Provincial, Regional and local policy initiatives and the release of a complete, draft Official Plan so that the evolving policy framework can be evaluated in its totality. Based on our review of the Mississauga Official Plan 2051, we have a number of concerns as further outlined below.

#### Chapter 3: Directing New Development

In accordance with the in-effect Provincial and Regional policy frameworks, the Mississauga Official Plan introduces a new term – Strategic Growth Areas. Section 3.3.1 provides the policy framework for how growth and development is to be managed across Strategic Growth Area lands. We understand that Strategic Growth Areas are those lands located within the Downtown Mississauga Urban Growth Centre, in Major Node Character Areas, in Community Node Character Areas and within Major Transit Station Areas. In accordance with the policy framework and Map 3-1, Strategic Growth Areas, the Subject Lands are located within a Strategic Growth Area. We support the identification and policy directions identified for Strategic Growth Areas., which collectively identify Strategic Growth Area lands as those areas of the City where a mix of land uses, and higher density, transit-supportive development ought to occur to support the achievement of complete communities.

#### Chapter 5: Housing Choices and Affordable Homes

A new housing-related policy framework is proposed and is presented in Chapter 5, Housing Choices and Affordable Homes. Policies 5.2.2, 5.2.4, 5.2.5 and Table 5.1 as stated below are particularly concerning:

*'5.2.2. Phased development will have a range and mix of housing types for each development phase.'*

The purpose of this policy is unclear. As written, the policy appears to place an obligation on development proponents to provide a range of housing types, without specifying what is meant by housing type. For example, as written, the policy could be interpreted to require that each development phase is required to provide two or more housing types, such as apartment-style units, ground-oriented units, townhouse-style units, etcetera. The requirement for each development phase to provide a variety of housing types can be problematic and can challenge the ability to deliver high-quality housing options for current and future residents. In our opinion, the policy should be revised to encourage phased developments to provide a range and mixture of housing units, thereby removing reference to housing type.

5.2.4. *To achieve a balanced mix of unit types and sizes, and support the creation of housing suitable for families, development containing more than 50 new residential units is encouraged to include a minimum of 50 percent of a mix of 2-bedroom units and 3-bedroom units. The City may reduce these percentages where development is providing:*

- *social housing or other publicly funded housing; or*
- *specialized housing such as residences owned and operated by a post-secondary institution or a health care institution or other entities to house students, patients employees or people with special needs'*

We note that the above-noted policy has been revised since the previous draft policy was presented in the Bundle 3 draft of the Mississauga Official Plan in May of 2023. Specifically, the percentage of larger units has increased to a 50% target from the previous draft policy which stated 30%, while the language has also changed to include the phrase “encouraged”. The re-phrasing and use of the word “encourage” is supported; however, we remain concerned with the policy as drafted. In our opinion, the above-noted policy should be modified to encourage a reduced percentage (20% or less) of larger, family-sized units (understood as being two-bedroom units or larger) based on market trends. The requirement for half (50%) of units to be of a certain unit type will challenge Provincial, Regional and local policy objectives of delivering a variety of affordable and attainable housing options for current and future residents. It may also challenge the delivery of housing units in appropriate locations that are in proximity to existing and planned transit networks and support the creation of complete communities, while also being in the midst of a Provincial housing crisis.

5.2.5. *The City will plan for an appropriate range and mix of housing options and densities by implementing Regional housing unit targets shown in Table 5.1'*

*Table 5.1 – Peel-Wide New Housing Unit Targets*

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses. Note: These targets are based on housing need as identified in the Peel Housing and Homelessness Plan and Regional Housing Strategy</i>

The above-noted policy and Table 5.1, as written, are concerning. Use of the Region-wide housing targets, as established by Policy 5.2.5 and Table 5.1 are concerning as the housing-related targets have not been adapted nor studied to ensure applicability at the smaller, City-wide scale. Furthermore, the requirement in Table 5.1 that 30%

percent of all new housing units are to be affordable housing units and the requirement that 25% of all new housing units be rental in tenure are concerning and will challenge the rapid delivery of housing units, in appropriate locations. Furthermore, the requirement for affordable units, regardless of a property's location, is contrary to in-effect Provincial and Regional policy objectives, which state that affordable housing units are legislated requirements in Inclusionary Zoning Areas. The policy requirement that 30% of all new housing units across the City of Mississauga be affordable housing, without identifying how affordable housing units are to be understood, is concerning. We request that Table 5.1 be modified so as to relate to housing targets at the City-wide scale and to reflect that affordable housing units are to be provided through the application of Inclusionary Zoning.

#### Chapter 8: Well Designed Healthy Communities

A new urban design-related policy framework is proposed and is presented in Chapter 8, Well Designed Healthy Communities. Policies 8.4.1.17, 8.4.5.2 and 8.6.2.5 as stated below are particularly concerning:

*'8.4.1.17. Built form will relate to the width of the street right-of-way.'*

As written, this policy is concerning and requires modification. In our opinion, the requirement for a built form to have a relationship to the width of the public Right-of-Way ('ROW') on which it fronts is inappropriate. As written, the policy will apply a one-size-fits-all approach to sites across the City, regardless of their location and unique contexts. Furthermore, a limitation of building height to relate to the ROW width will challenge the ability to provide efficient, high-quality, refined, compact, mixed-use, transit supportive development forms in the desired locations. It can also challenge the implementation of development, particularly when development fronts onto private streets which often have reduced ROW widths. For the reasons outlined above, this policy requires revision to eliminate a universal application of building height limits based on a site's location along a street.

*'8.4.5.2. Privately owned publicly accessible spaces will be designed in accordance with the city's standards for public open spaces.'*

The above-noted policy is concerning and is vague. In our opinion, the above-noted policy requires revision to provide for sufficient flexibility based on a site's locational attributes. The statement that Privately Owned Publicly Accessible Spaces (POPS) be designed in accordance with City Standards is concerning given City Standards for public open spaces do not always reflect the as-built condition of encumbered lands being provided as privately owned, publicly accessible spaces. Furthermore, greater acknowledgement is required that POPS of varying size and locations can be successfully planned, designed and delivered in various ways. Based on the above, we request that the above-noted policy be modified to encourage compliance with City Standards and that conformance with the City's Standard for public open spaces not be required in this instance.

*'8.6.2.5. Transitions between buildings with different heights will be achieved by providing a gradual change in height and massing. This will be done through the use of a variety of methods including setbacks, the stepping down of buildings, the general application of a 45 degree angular plane, separation distances and other means in accordance with Council-approved plans and design guidelines.'*

The above-noted policy is concerning. In our opinion, the above-noted policy requires revision to exclude the requirement that any development be required to conform to a 45 degree angular plane. As the policy suggests, there are various ways of ensuring appropriate transition can be provided. In our opinion, a policy requirement that a development application conform to a 45 degree angular plane, without specifying how the angular plane is to be applied, is overly restrictive and unnecessary. In our opinion, the 45 degree angular plane requirement should be removed from the above-noted policy.

### ***8.6.1, Buildings & Building Types***

The draft MOP proposes refinements to the urban design-related policy framework and an evolution towards a built form-based policy framework. Section 8.6.1 of the draft MOP presents the refined built form policy framework and provides a characterization of how each built form is to be generally understood. Of relevance to the Subject Lands, the draft MOP presents characterizations of low-rise built forms as follows:

- 'a. Low-rise buildings: they include a variety of grade-related housing types that range from detached and semi-detached dwellings to slightly denser forms such as townhouses and multiplexes. Low-rise buildings can also house non-residential uses such as commercial, institutional or other employment uses. They assist in providing a mix of built forms that support streets, parks and open spaces, at a lower scale – no taller than four storeys in height – and can be designed to integrate architecturally to complement the surrounding context and provide transition to existing streetscapes.'*

While we support the above-noted low-rise building characterization, we highlight that there is a disconnect between the approved low-rise built form for the Subject Lands and the built form based land use designation of 'Residential High-Rise' assigned to the Site. In our opinion, the above-noted characterization should be modified to recognize that low-rise buildings may exist and be permitted in various land use designations and in various communities across the City.

### **Chapter 10: Land Use Designations**

The draft MOP proposes refinements to the land use policy framework and an evolution towards a built form-based policy framework. This evolution and associated policy refinements are concerning. In accordance with the draft Schedule 7, Land Use Designations, a number of properties across the City, including the Subject Lands, have been re-designated. In our opinion, there are instances where this is akin to down designations and if adopted, would result in the loss of development permissions in comparison to existing permissions.

In the case of the Subject Lands, Schedule 7 has re-designated the Subject Lands from 'Residential High Density' to 'Residential High-Rise'. A Natural Hazards policy overlay has also been revised, but continues to apply a segment of the Site immediately north of the adjacent gas station facility. The proposed re-designation is concerning. Specifically, the active SPA application for the Site would introduce a low-rise, townhouse built form. However, the draft parent 'Residential High-Rise' land use policies (Policies 10.2.5.10 and 10.2.10.11) state that dwelling units in buildings with heights greater than 8 storeys are permitted or alternatively, lower rise residential built forms such as townhouses are permitted as accessory uses to an apartment structure on the same lot. A narrow interpretation of the draft residential-related land use policies would appear to suggest that townhouse dwellings are not permitted. This absence of permissions for townhouse dwellings is concerning and conflicts with the Special Site policy which is to apply to the Subject Lands.

Furthermore, the proposed 'Residential High-Rise' designation and associated height permission for Residential High-Rise lands of 8 storeys is inconsistent and conflicts with the 'Residential High Density' designation and maximum four (4) storey height permission identified for the Site on Schedule 8m. The application of a Natural Hazards overlay as identified on Schedule 7 is also inconsistent and conflicts with the land use designations indicated on Schedule 8m. Given the above, the Site's designation requires re-evaluation.

#### Chapter 11: Transit Communities

The draft Official Plan proposes to provide a policy framework for lands within Major Transit Station Areas ('MTSAs'). The delineation and land use designations assigned to Protected MTSA (PMTSA) lands are presented in Schedules 8a through 8r. We highlight that the land use designations identified on these Schedules do not align with the land use designations and policy framework presented in Chapter 10. This discrepancy is concerning and requires modification.

Furthermore, Chapter 11 provides for a policy framework that appears to be informed by the City's previous Official Plan Amendments 143 and 144. We highlight that OPA 143 and 144 are not in full force and effect, given they remain before the Region of Peel for approval. Therefore, the inclusion of Major Transit Station Area (MTSA) policies in this draft and presented in this manner is concerning.

In accordance with Schedule 8m, the Subject Lands are identified as being located within the North Service Protected Major Transit Station Area (PMTSA), as being designated 'Residential High Density' and as having a maximum building height permission of 4 storeys. We support the inclusion of the Subject Lands within the North Service PMTSA given the Site's locational attributes. However, we request that additional policy direction be provided to determine how development applications which seek building heights above and beyond those established by the MTSA Schedule are to be evaluated. In the case of the Subject Lands, while the height permissions are appreciated, they may also restrict development opportunities should an alternative development form be desired. Additionally, the identified maximum height of 4 storeys is less than height permissions for lands to the north of the hydro corridor. Sufficiently high height permissions are requested to ensure the ability of the Site to accommodate the provision of a high-quality, refined, efficient, compact development that supports the Provincial and Regional objectives for MTSA lands is not challenged.

#### Chapter 12: Urban Growth Centre:

Revisions are contemplated in Chapter 12 for lands formerly located within the Downtown component of the City Structure. We highlight that the term Downtown has been replaced with the term Urban Growth Centre throughout the policies. In accordance with Chapter 12 as drafted, the Subject Lands are located within the Urban Growth Centre and the Hospital Character Area of the Urban Growth Centre.

Sections 12.1, 12.3 and 12.6 present a refined policy framework for lands within the Hospital Urban Growth Centre Character Area. We are concerned with the revised Hospital Urban Growth Centre Character Area policy framework as presented in Section 12.6. Our concerns with these policies, which appear to be a repetition of the policies enacted by City Council following the 2022 Downtown Fairview, Cooksville and Hospital Policy Review, is related to Policies 12.6.3.2 and 12.6.4. Policy 12.6.3 permits additional height without requiring an Amendment provided additional non-residential areas are provided, In our opinion, Policy 12.6.3.2 as drafted does not adequately accommodate the evolving context

of the community nor changing market trends. The requirement to provide additional non-residential uses and area above the ground level does not adequately accommodate a developer's ability to right-size the non-residential areas to be provided and facilitate an optimal site design. We request that the policy be modified to enable additional height to be permitted, subject to differing evaluation criteria.

Finally, Policy 12.6.4 is concerning given the development potential of the Subject Lands was confirmed through the active development application. We request that the Subject Lands be excluded from this policy going forward.

Chapter 16: Special Sites

Revisions are contemplated to the Special Site policy framework. Specifically, a new Chapter 16 is contemplated which presents all Special Site policies, presented in sequential order, rather than as components of the parent Character Area policies. Of relevance to the Subject Lands, the Site is identified as being located within and subject to Special Site 122 (Downtown Hospital – UGC) and policies 16.122.1 and 16.122.2. Policy 16.122.2 continues the permission for townhouses on the Subject Lands; however, this Policy is also highlighted as being a component of the broader PMTSA policy framework. We request that this policy be maintained.

**Conclusion**

In summary, we are concerned about the proposed policy directions outlined in the draft Mississauga Official Plan 2051 and request that modifications be made. Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Mississauga Official Plan Review initiative and wishes to be informed of updates, future meetings and the ability to review and provide comments on the final Official Plan prior to adoption.

We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**



Glen Broll, MCIP, RPP

**Managing Partner**



Stephanie Matveeva, MCIP, RPP

**Associate**

cc. Camilla Towns Inc.  
Councillor Damerla  
Ben Philips, Project Manager, Official Plan Review