

25 July 2025

Jennifer Le
Municipal Services Office - Central Ontario 16th floor
777 Bay Street, Toronto, ON
M7A 2J3 Canada

Attention: Jennifer Le, Senior Planner

Dear Jennifer,

**RE: Comments on ERO Item 025-0468 (Ministry Reference Number: 21-OP-249936)
City of Mississauga – Approval of a Municipality’s Official Plan
1315 Bough Beeches Boulevard, Mississauga, ON
WND File: 23.514**

WND Associates has been retained by 1315 Bough Beeches Boulevard Limited as the planning consultant with respect to the lands municipally known as 1315 Bough Beeches Boulevard (“Subject Site”). The Subject Site is located within the Rathwood-Applewood neighbourhood, and approximately 650 metres to the south of Dixie Station. The Subject Site is approximately 2.37 hectares in area, with 135 metres of frontage on Dixie Road, 170 metres of frontage on Rathburn Road East, and 128 metres on Bough Beeches Boulevard. The Subject Site presently contains a central 20-storey “tower-in-the-park” apartment building that is surrounded by two surface parking lots that are accessed by two separate driveways from Bough Beeches Boulevard. The Subject Site also contains a vast amount of open space, two tennis courts, trees, and a ramp to the underground parking garage (see **Figure 1** below).

The Subject Site is currently designated *Residential High Density* (Schedule 10 Land Use Designations) within the in-force City of Mississauga Official Plan, while it is designated as *Residential High Rise* within the 16 April 2025 Council-adopted Mississauga Official Plan 2051 (Schedule 7: Land Use Designations). The Subject Site is also located within the Rathwood-Applewood Growth Node (or the Rathwood-Applewood *Community* Node within the in-force Mississauga Official Plan). The Subject Site is zoned Residential “H-RA5-39” in City of Mississauga By-law 0225-2007. The parent RA5 zone permits a maximum building height of 77.0 metres or 25 storeys and a maximum floor space index of 2.9 FSI.

On 10 December 2008, City of Mississauga Council passed by-law 0408-2008, having the effect of introducing site specific regulations for the Subject Site, which include a maximum building height of 20-

storeys, an overall site density of 2.56 FSI, and permissions for townhomes. Schedule RA5-39 is found below (Figure 2).

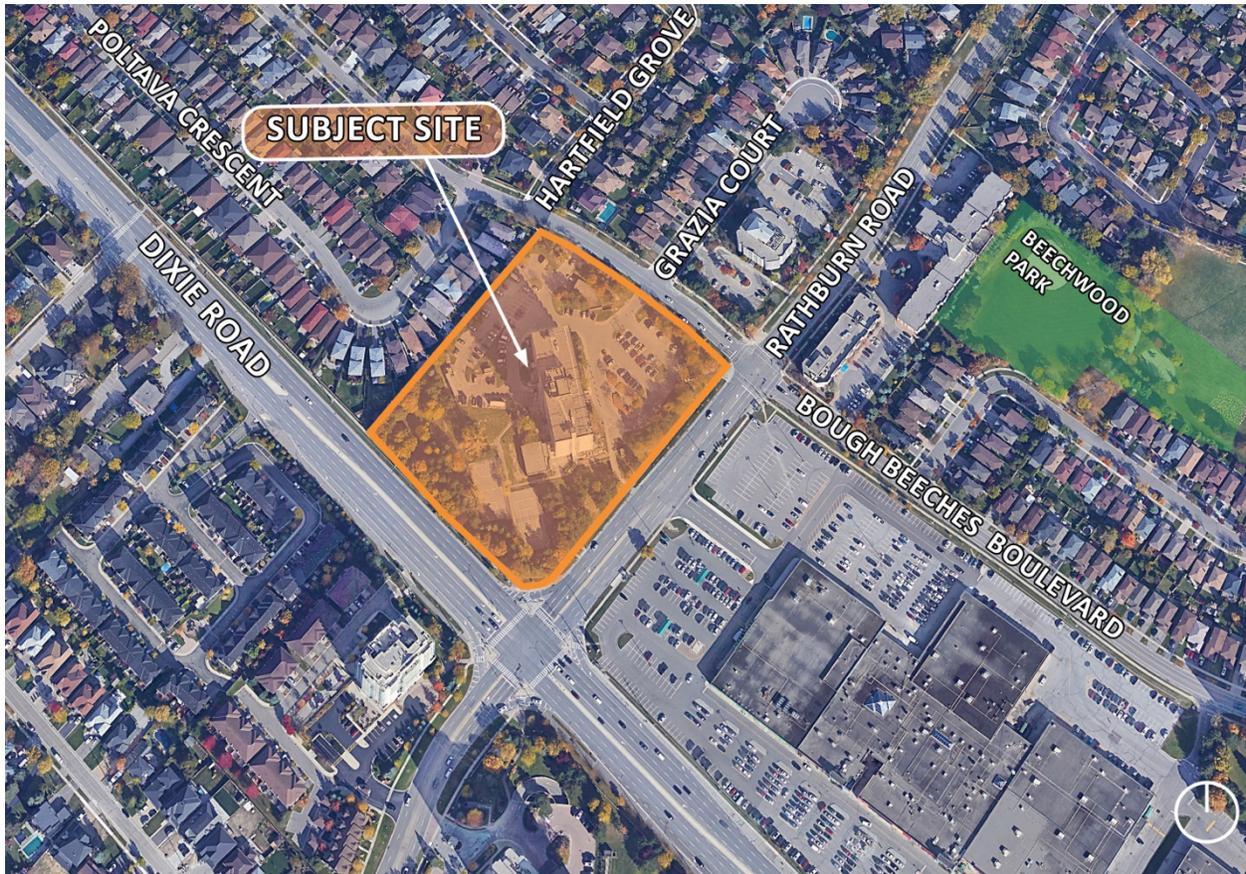


Figure 1: Aerial View of the Subject Site (outlined in orange)

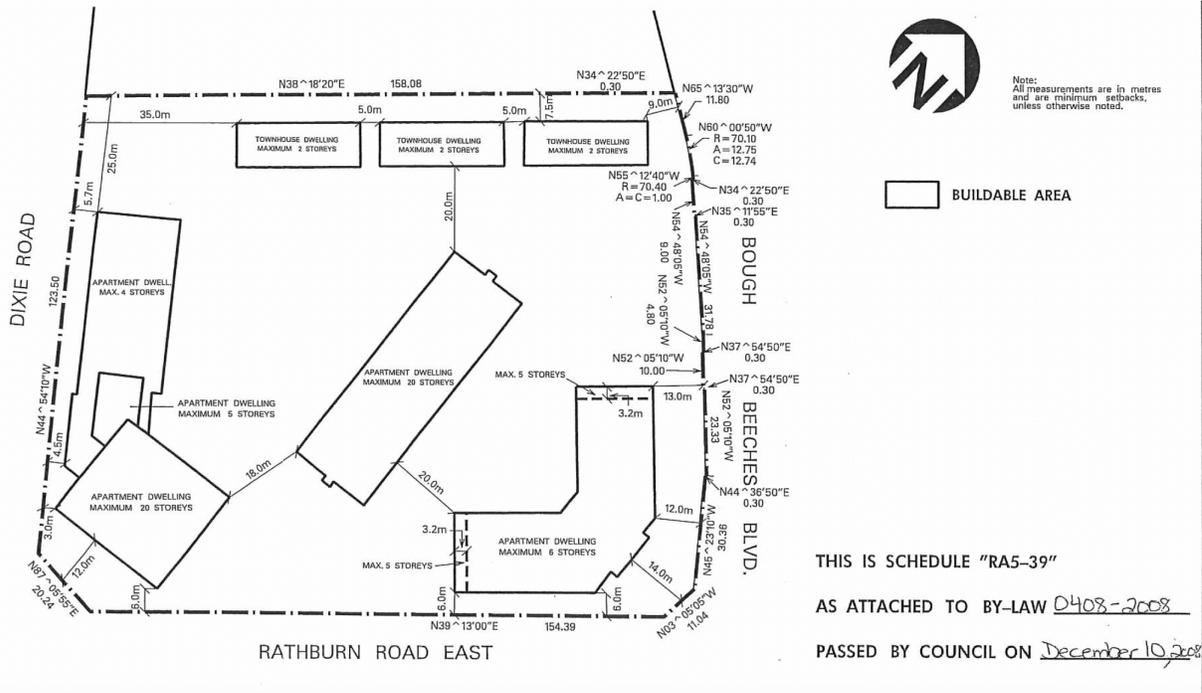


Figure 2: The Subject Site within the City of Mississauga Zoning By-law 0225-2007 – Schedule RA5-39 of By-law 0408-2008

We have reviewed the 16 April 2025 Council-adopted Mississauga Official Plan 2051 and would like to provide the following comments:

Comments on Mississauga Official Plan 2051 (By-law 0069-2025)

Our office contacted Planning and Building/Official Plan Review staff at the City of Mississauga on 10 March 2025 to raise our concern that the January 2025 Proposed Mississauga Official Plan 2051 did not carry forward the site-specific permissions relating to Official Plan Amendment 89 and By-law 0408-2008, which are noted above. Our specific request was to include site-specific permissions that regulate height (20 storeys), but to not carry forward the site-specific Floor Space Index permissions that apply to the Subject Site (2.56), as the site-specific permissions for density (FSI) were far less than the overarching density limit for the Rathwood-Applewood Growth Node (3.75). As a result of our discussions, both site-specific permissions were included within a subsequent draft that was released as part of the agenda for the 24 March 2025 Planning and Development Committee Meeting (Appendix 1 relating to Item 6.5). These site-specific permissions are now included within the 16 April 2025 Council-adopted version of the Mississauga Official Plan (By-law 0069-2025) as Special Site 187 (please see below).

Given the evolving planning context since the site-specific approvals in 2008, including the Primary Major Transit Station Area (Dixie 403 PMTSA) boundary bordering to the north, and the Subject Site’s characteristics that include its proximity to the Dixie Station and vast amount of on-site open space, we believe the Subject Site should be regulated by the overarching density maximum for the Rathwood-Applewood Growth Node, as stipulated by Policy 14.2.9.3.4 of the Council-adopted Mississauga Official

Plan and Policy 14.1.7.2.4 of the in-force Mississauga Official Plan. Policy 14.2.9.3.4 is included below for reference:

14.2.9.3.4 In order to guide the form, massing and density of proposed buildings, individual properties will generally be limited to a maximum floor space index (FSI) of 3.75.

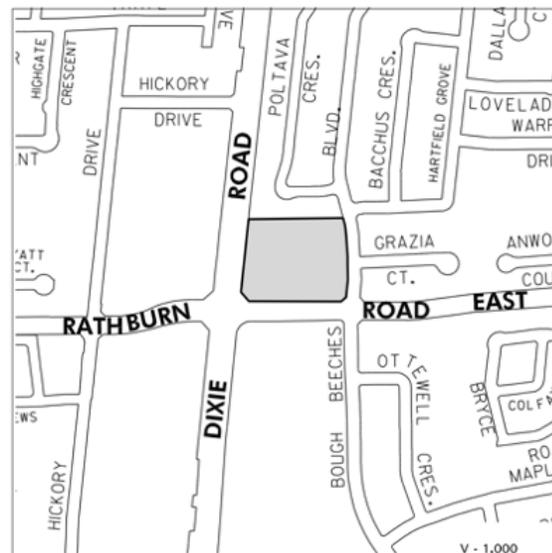
Furthermore, in an effort to provide additional background, the City of Mississauga initiated the Reimagining the Mall project in 2017, which involved a review of Official Plan policy review of six (6) existing shopping mall sites to guide the future development of these properties. Mississauga City Council adopted OPA 115 in December 2020 which included a maximum building height for Community Nodes, including the Rathwood -Applewood Community Node, of 15-storeys and an overall site density maximum of 2.25 FSI. These permissions were subsequently increased to 18 storeys and 3.75 FSI, respectively, through a 4 March 2024 OLT decision (OLT Case Number: OLT-22-002285). Therefore, at the time OPA 115 was adopted by Council, the Subject Site represented the greatest height and density permissions, from an Official Plan policy standpoint, for the Rathwood-Applewood Community Node. Conversely, if the Mississauga Official Plan was approved by the Minister in its current form, the Subject Site would have density permissions that are significantly less than what is permitted for the rest of the Rathwood-Applewood Growth [Community] Node.

Given the foregoing, we formally request that Policy 17.187.2 of the Council-adopted Mississauga Official Plan 2051 (By-law 0069-2025) be revised to read as follows:

Site 187 (Rathwood - Applewood Growth Node)

17.187.1 The lands identified as Special Site 187 are located north of Rathburn Road East and east of Dixie Road.

17.187.2 Notwithstanding the provisions of this Plan, townhouse dwellings will be permitted. The maximum ~~floor space index (FSI) permitted for all development will be 2.56 and the maximum permitted height will be 20 storeys.~~



This deletion will ensure the Subject Site can take advantage of the 3.75 density permissions that would otherwise apply were it not for the site-specific policies from 2008, which are now outdated. It would facilitate the delivery of new rental housing given it would eliminate the need to submit a site-specific application, which is consistent with City and Province's goal of addressing the housing crisis.

In our opinion, the Subject Site is a key property within the Rathwood-Applewood Growth Node that has the potential to accommodate additional density through infill development. Increased density permissions for the Subject Site would aid in the City achieving the density target for the Rathwood-Applewood Growth Node Growth Node, which is stipulated by Policy 14.2.9.3.5 of the Council-adopted Official Plan 2051. This Policy has been included below for reference:

14.2.9.3.5 A gross density of between 150 and 250 residents and jobs combined per hectare measured across the Node will be achieved.

We hope our comment can be considered prior to the Minister's final approval of the Mississauga Official Plan. Should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

WND associates
planning + urban design



Andrew Ferancik, MCIP, RPP
Principal & President