

July 24, 2025

Our File: 667-002

Ministry of Municipal Affairs and Housing
Office of the Minister
777 Bay Street, 17th Floor
Toronto ON, M7A 2J3

Re: City of Mississauga Official Plan 2051
ERO Number: 025-0468
Ministry Reference: 21-OP-249936
CPD Developments Inc.;
1403 & 1425 Dundas Street East
Region of Peel, City of Mississauga

Glen Schnarr & Associates Inc. (GSAI) has been retained by CPD Developments Inc. (the “Owner” or “Client”), owners of the properties municipally addressed as 1403 and 1425 Dundas Street East in the City of Mississauga (“Subject Lands”) to provide a planning opinion to support the Subject Lands removal from the in-effect Special Policy Area through a Ministerial Modification to the Council approved 2051 City of Mississauga Official Plan (“City’s 2051 OP”).

This memo has been prepared to supplement the formal request submitted by McMillan LLP with regard to the ERO posting 025-0468, Ministry Reference 21-OP-249936.

We provide the following as our professional planning opinion related to this request.

Site & Area Context

The Subject Lands are generally located at the north-east corner of Dixie Road and Dundas Street East. These lands are located within a key strategic growth area of the City, in a prime location to provide for housing and supporting services to support the goals of the Dundas Connects Master Plan, Dixie GO (Milton line) Primary Major Transit Station Area (‘PMTSA’), amongst other in place policy initiatives.

The Subject Lands consist of a total of two properties - 1403 and 1425 Dundas Street East. The existing use of the property is a single storey commercial retail development with associated surface parking. The building at 1425 Dundas Street East was constructed in 1984 with an approximate gross floor area of 112,944 square feet. The site has 296 surface parking spaces. The

site at 1403 Dundas Street East was constructed in the mid-1980's with an approximate gross floor area of 3, 576 square feet. The site has 40 parking spaces.

The total (cumulative) site area of the Subject Lands is 2.13 hectares or 5.27 acres and provides frontage on both Dundas Street East and Dixie Road. The Subject Lands are located approximately 300m from the Dixie GO Station and situated along the route for the future Dundas Bus Rapid Transit corridor. This is shown in the appended Aerial Context Plan at **Tab A** (prepared by Glen Schnarr & Associates Inc, dated July 15, 2025).

The surrounding area can be generally characterized as low-rise commercial and/or lighter industrial uses with surface parking. There are residential uses located approximately 600 meters north of the site on Dixie Road and 500 meters west of the site on Dundas Street. There are a number of schools within 1.3-2.3 kilometres of the site.

The surrounding area presents a unique opportunity to pursue development opportunities more in keeping with the locational advantages that are more characteristic of a higher-order transit station. This area can be fairly characterized as an area in transition, with the Subject Lands being in a prominent gateway and physical location at the intersection of Dixie Road and Dundas Street.

Executive Summary - Development Proposal and Request to Province

The Subject Lands are not currently under active planning applications, however, have proceeded to a formal Development Application Review Committee Meeting (equivalent of a pre-consultation meeting) with the City of Mississauga and relevant approval authorities. It was determined that an Official Plan Amendment and Zoning By-law Amendment (together, the "Applications") would be required, at a minimum, to permit a proposed Mixed Use development. It was also noted that the Subject Lands are included in a "Special Policy Area" ("SPA") under the City's 2051 OP (defined by Provincial Government criteria and as established by the Toronto and Region Conservation Authority ('TRCA')). The SPA boundary is informed by TRCA floodplain mapping and generally prohibits any development within the limits of the SPA (including any change in land use designation) prior to the formal removal or lifting of the SPA from the site.

Generally, the Applications propose high-rise residential towers with at grade retail/commercial space and park area within a Regionally and Municipally defined Protected Major Transit Station Area ('PMTSA'), in the City of Mississauga. The proposal will bring forward approximately 1,500 residential units in six towers situated atop three podiums ranging from 19-32 storeys amidst a housing crisis. The development proposal itself represents an opportunity to achieve consistency with provincial policy directives and guidance supporting or capitalizing on public investment in infrastructure, appropriately directing growth and providing much needed housing.

The proposal aims to revitalize the Subject Lands with a modern mixed-use development consistent with the City's general vision for Dundas Connects and Protected Major Transit Station



Areas. However, the delivery of the many benefits brought forward through this proposal is challenged by the restrictions imposed through the policies of the applicable SPA.

As noted in the Cover Letter prepared by McMillan LLP to this modification request, the restrictive or prohibitive land use matter associated with the Subject Lands (and subject of this Ministerial Modification request) is related to the in-effect SPA and the application of an outdated Floodplain Mapping to inform same. As stated above, the Provincial SPA is informed by an outdated TRCA Floodplain Mapping. . The application of the outdated floodplain mapping in the City's 2051 OP to inform the SPA captures the entirety of the Subject Lands, whereas only ~7% of the Subject Lands are captured under the most recent TRCA floodplain mapping. Additionally, this 7% area is only a flood fringe and not a floodplain hazard area. We are attaching at **Tab B** a copy of the updated TRCA floodplain mapping, overlaid on aerial imagery to illustrate the impacts of the defined TRCA floodplain mapping. This Floodplain Mapping was obtained from the online floodplain viewer (available for public information). We note that the TRCA's online Floodplain Map Viewer indicates that the floodline presented through the online tool is an Engineered Flood Plain, and as such, is considered to be largely accurate. It is our understanding that this mapping became available in 2015, which post dates the implementation of the SPA.

Our request to the Province is recognition of the acknowledged TRCA Floodplain Mapping which places the Subject Lands almost entirely out of the Floodplain limit. This would involve revisions to the boundary of SPA 132 (Dixie Employment Area), outlined under Chapter 17 of the City's 2051 OP.

The scenario is shown in the attached graphic at **Tab B** (Floodplain Limits Plan as it relates the Subject Lands dated March 21 2025, prepared by Glen Schnarr & Associates Inc.) which confirms that with an approximate total site area of 5.29 acres, only 0.37 acres of the site is situated within the updated TRCA's Floodplain Mapping, making approximately 93% of lands free of flooding however, still subject to the restrictive policies under the SPA. This was determined by our Client's team of experts through a due diligence period to understand the redevelopment feasibility of the Subject Lands. The method of discovery is described below in the "Work Undertaken to Date" Section of this memo.

In short, the SPA (132) Mapping in the City's 2051 OP captures an exorbitant amount of land within the Floodplain area when compared to the true limits of the floodplain imposed by the updated TRCA Floodplain mapping. This ultimately precludes lands from redevelopment until such time that the SPA is lifted in it's entirety. This request to the Province is a way to accelerate the partial lifting of the SPA 132 (consistent with the true limits of the TRCA Floodplain Mapping) as it relates to the Subject Lands and would both correct the current mapping error associated with the inaccurate and outdated TRCA Floodplain Mapping and allow our Client to move forward to advance the Applications for a Mixed Use (predominantly high density residential) development.

For further context, the SPA policies prohibit the Council of the City of Mississauga from amending land use designations, growth node limits, or any other policy matter bound by the SPA (through either a Privately or Publicly led Planning Application) until such a time that the SPA is

lifted. The SPA can only be lifted once the appropriate flood mitigation solutions are implemented on the ground. The preferred flood mitigation solution is outlined in the Dixie Dundas Flood Mitigation Study which is a Schedule C Environmental Assessment. This was undertaken by the City and their Consultant. The lifting of the SPA would follow the implementation of flood mitigation strategy that culminate from the City's Schedule C Environmental Assessment associated with this area, however, it is not clear when the strategies would be implemented on the ground. This forms the basis of this request to the Province for a Ministerial Modification to the SPA associated with Subject Lands.

The focus of this memo is to provide rationale for our request to the Province to amend the Special Policy Area 132 boundaries. This memo is not intended to justify the merits of the development proposal, as that will be evaluated through the forthcoming Applications. However, for our Client to proceed with filing the Applications, they will require a level of confidence or comfort that the shorter term development objectives are feasible, which requires the Subject Lands to be removed from the Special Policy Area 132.

Land Use

The following presents a discussion on the in-effect land use designations, policy frameworks and zoning, at a high level.

The Region of Peel Official Plan (2022)

The subject property is located with the Urban System of the Region of Peel Official Plan (Schedule E-1 Regional Structure). The subject property is located in the Dixie Dundas Node and Primary Major Transit Station Area (Schedule E-5 Major Transit Station Area).

Mississauga Official Plan - Council Approved 2051

The subject property is currently designated Mixed Use with a Natural Hazard overlay (Schedule 10 – Land Use Designations). The subject property is within an Employment Area (Schedule 1b – Urban System – City Structure).

Dundas Street is identified as an Intensification Corridor (Schedule 1c - Urban System Corridors). Lastly, the Subject Lands are within the 500 m radius of the Dixie Major Transit Station Area (Schedule 2 – Intensification Areas). The Subject Lands are also located within the Dixie-Dundas Growth Node and under Chapter 11 of the Official Plan, are part of the Dundas Street Corridor Transit Community (which appears to implement the findings of the Dundas Connects Master Plan, which is described below).

As outlined in the City's 2051 OP and described in the Summary section of this memo, the entirety of the Subject Lands are currently situated within Special Site 132 ("SS132")– Dixie Employment Area (Chapter 17 – Employment Areas of the City of Mississauga Official Plan), the limits of which are informed by the outdated TRCA floodplain mapping.

From a land use planning perspective, City staff have previously indicated that it is the City's intent that the site will be removed from the Employment Area designation through a City-initiated Official Plan Amendment, adopted into the limits of the future Dixie-Dundas Community Node and given a Mixed-Use Limited land use designation once the SPA has been lifted. While this is encouraging, we have major concerns on the timing of the comprehensive removal of the SS132. Waiting for the Special Policy Area SPA to be lifted for the entirety of the lands impacted by SS132 will add many years to this project and continue to unnecessarily restrict development on the Subject Lands. Our conservative estimate is that the City's Schedule C Environmental Assessment work, which is subject to ongoing financing challenges, is significantly farther from completion, than our clients target date for construction kick off in 2028.

Our team has undertaken significant work to determine the appropriateness of this site being included in the spill zone and feel it has unjustifiably included and further, can be redeveloped prior to the City lifting the entirety of the SPA, and can do so without precluding or hindering the recommendations of the Environmental Assessment or other projects or redevelopment of adjacent sites. This is discussed further throughout this Planning Justification Memo.

Dundas Connects Master Plan (DCMP)

The Subject Lands are with the Dundas Connects Master Plan area, more specifically the Dixie Focus Area. This plan highlights opportunities to increase densities and the mix of uses in the Dixie Focus Area and greater Dundas Street, where the Subject Lands are located. It is our understanding that the City has incorporated the recommendations of the DCMP into the Council approved City's 2051 OP, where possible.

It is important to note that the City made efforts to implement recommendations falling out of the DCMP for the Subject Lands and the surrounding area, however, when this was formally presented for consideration, the City received comments from the TRCA advising that this was not possible on lands situated within the SPA, based on the fact that the SPA prohibits any change in land use designations prior to its lift or removal.

There is a clear intent by the City for these lands to host alternative development than that which exists today, however the delivery is challenged by the policy restrictions under the SPA.

Mississauga Zoning By-Law 0225-2007

The Subject Lands are zoned General Commercial (C3-65), which permits a wide range of commercial uses. No residential uses are permitted in this zone.

We agree with the City that an application to amend the City's Official Plan and Zoning By-law would be required to facilitate the proposed development. Should the Minister accept and accommodate the request presented in this memo, our Client plans to expeditiously pursue privately-led amendments to the City's 2051 OP and Zoning By-law to permit for the proposed development and ultimately, realize the City's vision for these lands.

Work Undertaken to Date

Our team, and seemingly City staff, have long recognized that re-development of the Subject Lands is appropriate. Should the Minister accommodate our request, our Client's vision for the Subject Lands will provide 1,500 residential units and commercial development amidst a Provincial housing crisis in a Primary Major Transit Station Area and gateway in the Dundas Connects Corridor.

Before outlining technical studies undertaken in support of the SPA modification, we note that GSAI on behalf of our Client has made numerous submissions to the City and Region through their respective Official Plan Review public engagement processes. Amongst addressing the more general policies of the Official Plan, we have made requests to Planning staff, the Planning and Development Committee, as well as City Councillors to begin the process of amending or modifying the SPA. While City Planning staff seem generally supportive of unlocking the lands for redevelopment, the procedural complexities and egregious timelines associated with the lifting the SPA have challenged any further action on this matter.

In efforts to better understand the technical rationale for the application of the SPA over the entirety of our Clients lands, our Client retained CF Crozier & Associates as the consulting Engineers on the file. GSAI and CF Crozier & Associates have been following and evaluating the various policy frameworks and City-led technical initiatives (including the Schedule 3 Environmental Assessment) for a number of years, at the request of our Client. We have undertaken this endeavor considering our Client's interest in advancing construction in the shorter term (following requisite land use approvals to be dealt with through the Applications) with a target construction date of 2028.

Our team has reviewed the TRCA floodplain mapping (which is available online for public information) and compared that to the limits of the SPA132. As a reminder, the TRCA floodplain mapping is meant to inform the SPA boundary. Our team has determined that the Subject Lands are unjustifiably constrained based on our review of the updated TRCA online mapping tool. The online mapping tool shows a different floodplain limit which is significantly reduced and only captures the eastern limit of the subject lands (approximately 7% of the total site area of the Subject Lands). We note that the TRCA's online Floodplain Map Viewer indicates that the floodline presented through the online tool is an Engineered Flood Plain, and as such, is considered to be more accurate and correct than the floodline presented in the linework associated with the City 2051 OP (Special Site 132 – Dixie Employment Area). To confirm this linework presents the most up to date and recent information, GSAI obtained mapping (via email correspondence) in March of 2025 from the TRCA showing the limits of the floodplain which are deemed applicable. This map appears to be reflective of the reduced linework/limits of the floodplain shown through the online mapping tool and captures only the eastern limits of the Subject Lands. In short, the limits of the SPA 132 capture more lands than the floodplain mapping from the TRCA. Meaning, any lands in the SPA, even though they are not captured under the limits of the TRCA floodplain mapping, are prohibited from any development until the SPA is lifted.

In addition to confirming the true limits of the floodplain mapping, our Client had retained the expertise of CF Crozier & Associates to review the City's work associated with the Dixie Dundas Flood Mitigation Study and the Schedule C Environmental Assessment work. The Schedule C Environmental Assessment provides the preferred solutions to mitigate/manage the flood risk associated with the SPA with the goal of implementing flood mitigation solutions and unlocking lands for development. Following a detailed, technical review of the preferred mitigation solution, CF Crozier & Associates has determined that our client's lands are not impacted in any way from the preferred engineering solutions to address the Little Etobicoke Creek flooding and further, that the preferred solution does not require participation from our Client's Subject Lands to implement. To evidence this, CF Crozier & Associates prepared an evaluation of the preferred solution which has been attached at **Tab C** for your consideration (see 1403 & 1425 Dundas Street East – Floodplain Evaluation). We note that there are a total of two memos as the second memo was prepared to consider the property addressed as 1403 Dundas Street East (being the corner property), which was acquired later on by our Client, at the behest of the City.

In short, the latest and most up to date TRCA Floodplain Mapping as well as the Schedule C Environmental Assessment reinforce the case that the Subject Lands are unreasonably constrained by the SPA. We are of the opinion that this modification to the mapping associated with SS132-Dixie Employment Area is entirely appropriate based on the City's advancements with the Schedule C Environmental Assessment preferred solutions and the true limits of the in effect TRCA Floodplain Mapping. We note that our Client has been very patient in waiting for the Class 3 Environmental Assessment work to conclude, however is running out of opportunity to advance the development Applications in light of the time and efforts put forth to simply amend the boundary of the SPA. We are of the opinion that from a process perspective, this request is appropriately made to the Province during the time of their review of the City's 2051 OP on the basis that the Province is the ultimate approval authority for the SPA modification.

Undertaking this revision through a Ministerial Modification (which may require input from the TRCA) accelerates this matter from the current project timeline from the City related to the SPA lifting and would allow for the City to make a decision on a privately-led development application in advance of the flood mitigation solutions, which we anticipate would be implemented a number of years after the team could have theoretically obtained the land use approvals and potentially building/construction permits. This expedites planning approvals and the delivery of critically needed housing in a strategic transit-oriented area with no risk to the municipality or the TRCA.

This is supportive of in force land use policy regimes speaking to the supply of housing, supporting smart growth and intensification and capitalizing on investments in public infrastructure. We have provided a discussion on the merits of the Land Use Planning below.

Land Use Planning Rationale

The following discussion pertains to the most relevant policies and will evaluate the appropriateness of the requested modification with respect to the intent and objectives of relevant policy frameworks. While this does not represent an exhaustive review of the relevant policies, we have intentionally narrowed in on key themes and policies for focus and brevity.

The provincial and municipal plans and initiatives are meant to guide land use decisions in Ontario and provide the policy direction land use planning can appropriately be applied to this request. Pursuant to the justification provided below, we are of the opinion that the requested modification to the limits of the SPA meet the general objectives that frame the City's official plan and support Provincial objectives and underlying legislation and initiatives.

There are 6 main documents we have reviewed in the context of the SPA modification request. These documents include:

- Provincial Planning Statement, 2024;
- Region of Peel Official Plan 2025;
- City of Mississauga Official Plan, 2025;
 - o Dundas Connects Master Plan, 2018;
- The City of Mississauga Mayor's Task Force, 2025;
- More Homes, More Choice: Ontario's Housing Supply Action Plan (2019);
- Bill 17 - *Protect Ontario by Building Faster and Smarter Act, 2025*; and,
- Bill 23 – *More Homes Built Faster Act, 2022*.

There are no specific policies or legislation referenced in this memo. We have chosen to consolidate the spirit and intent of the policies relevant to the request before the Province to illustrate the appropriateness of the request from a land use planning perspective. We expect that the merits of the Applications will be reviewed through the formal Development Application Review process with the City and relevant review/approval agencies.

Below is a discussion of our professional planning opinion related to the request before the Province.

Bill 17 - *Protect Ontario by Building Faster and Smarter Act, 2025*

Amongst a number of changes, Bill 17 introduced significant changes to the *Planning Act* related to changes in planning instruments. Bill 17 can be seen as the Province's efforts to expedite infrastructure and land use approvals to facilitate new housing developments, recognizing that historically, regulatory barriers through the approvals process are challenging the efficient delivery of homes in the Province amidst a housing crisis. Bill 17 specifically focused on accelerating developments around transit-oriented communities. It is our opinion that our Client's request

would support the general objectives outlined in Bill 17 related to the expeditious development of lands and delivery of housing in strategic areas.

The essence of the change being requested, which is to release the lands from the SPA to support expedient redevelopment of the Subject Lands for a mixed use development, supports the underlying principles, goals and objectives which culminate in the spirit of Bill 17. By correcting a mapping error which effectively removes the lands from the SPA, our Client will be able to proceed with advancing development applications and obtaining a recommendation and decision on the future land use planning Applications from the City to permit redevelopment of the Subject Lands. Should our Client's lands remain in the SPA, it is certain that our Client will abandon short term redevelopment objectives and very realistically, be an outlier as the surrounding lands begin and continue to redevelop in the future.

Our Client is seeking to expeditiously advance Planning Applications to permit redevelopment of the Subject Lands. We anticipate a decision on the Application, and potentially issuance of permits, would be obtained years prior to any formal decision to lift SPA 132. We remind the Province that the City does not rely on our Subject Lands to implement any strategies associated with the flood mitigation project, nor would our client rely on the flood mitigation strategies and importantly, is not located within the true limits of the TRCA floodplain mapping which are meant to inform the SPA boundaries.

In summary, we submit that the spirit of Bill 17 is challenged by the overly restrictive, egregious mapping outlined in the City's 2051 OP with respect to the in-effect SPA which restricts any change in land use designation prior to the lifting of the SPA. This thereby limits the opportunity for strategically located lands which would otherwise be ideal lands to support transit oriented development from developing expediently.

Bill 23 – *More Homes Built Faster Act, 2022*

The Provincial government described Bill 23 as being “*part of a long-term strategy to increase housing supply and provide attainable housing options...*” with a goal of building 1.5 million homes in 10 years to help address the Ontario housing crisis. The Bill introduced changes including but not limited to, amendments to relevant regulations and the introduction of new municipal housing targets. Subsequently, the City of Mississauga signed a housing pledge to deliver housing within the 10 year horizon, with a main focus on development and redevelopment of lands within Major Transit Station Areas and Strategic Growth Areas. Bill 23 also provides the Minister with a new power to amend an official plan by order if, in its opinion, the plan is likely to adversely affect a matter of provincial interest.

Housing is a matter of provincial interest. We would encourage the Province to consider and implement our request in order to support the expedient delivery of housing which, in turn, also supports the policies and pledges of City initiatives and the City's 2051 OP.

Settlement Areas and Investments in Public Infrastructure

Generally speaking, policies surrounding the Settlement Areas provide direction for the wise use of land, guiding development to existing settlement areas to avoid the need for unnecessary expansion of the settlement area(s) and to capitalize on the efficiency of land and resources, and support transit oriented development. Provincial policies specifically provide that settlement areas shall be the focus of growth and development and further that within settlement areas, sufficient land shall be made available through intensification and redevelopment.

The release of the lands from the SPA to support redevelopment will make lands available and contribute more expeditiously to supporting the amount, range and mix of residential units in the City, providing for an efficient supply of housing located within the settlement area. Specifically, this request supports the principle of efficient development of lands and resources/infrastructure through the redevelopment of underutilized lands that is proximate to planned and funded higher-order transit, the Dundas BRT, and is within a Protected Major Transit Station Area (formed around the Dixie GO station to the south).

In short and pursuant to Provincial and local policies, the request to the Province satisfies the locational criteria of ideal candidate lands for redevelopment that capitalize on existing and planned infrastructure and providing access to housing which is supported by transit.

The Provision of Housing, the Efficient Use of Lands and Strategic Infill Development

Accommodating the modification request would achieve consistency with provincial policy directives and guidance surrounding public investment in infrastructure, provision of housing and appropriately directing growth.

The Province of Ontario has acknowledged the ongoing Ontario Housing Crisis. As outlined in the More Homes, More Choice: Ontario's Housing Supply Action Plan, which was introduced to unlock development for all types of housing, the Province has prioritized an approval process that *can create conditions that make it easier to build housing and introduce policies that encourage densification. and make the most of infrastructure investments and encourage more density around major transit stations.* We believe that the restriction imposed on our client's lands related to the boundary of the SPA is a direct contravention of these basic principles surrounding the expeditious delivery of housing. The Provincial Modification of the SPA would directly support the Province's commitment to streamline approvals and prioritize the delivery of housing in strategic areas.

We believe that the existing prohibition on redevelopment of the Subject Lands, pursuant to the restrictions set out under the SPA, is an underutilization of lands serviced by existing infrastructure and is inconsistent with the Local, Regional and Provincial policies related to leveraging opportunities for infill development in strategic areas. Infill redevelopment (focusing on strategic growth areas) is the continued focus of future growth within the City.

In this respect, we would also reference the Mayor's Taskforce priorities. In the Mayor's Task Force Report (2025), it was noted that a top priority was to tackle the housing crisis and develop solutions to get more housing built more quickly in Mississauga. Part of this priority was for the City to support development in Major Transit Station Areas. The City is simply unable to mobilize or make land use planning decisions on the Subject Lands due to the restrictiveness of the SPA. With the help of the Province to lift the SPA limits from Subject Lands, the objectives of the Mayors Task Force initiative are supported. In theory, should the SPA not have been in effect on the Subject Lands, the City could have changed the land use designation and pre-zoned the lands through their ongoing work, thereby helping to expedite the development approvals process. The application of the SPA completely disables the City's ability to do so.

The request to modify the SPA will allow a development application to proceed expeditiously which promotes the efficient use of land through an intensified, compact built form, which is encouraged by Provincial and local policies where it can be accommodated. There are no flood mitigation risks to the Subject Lands and as such, they should be released from the limits of the SPA.

Major Transit Station Areas and The Dundas Connects Master Plan (2018)

Collectively, across many pieces of legislation, there have been efforts to expedite and introduce policies which encourage development (particularly Housing) within Major Transit Station Areas, as described above. This includes the policies contained in the City's 2051 OP. While the City appears to acknowledge the appropriateness and necessity of development in Major Transit Station Areas and recognizes the development opportunities presented through the Dundas Connects Master Plan vision, the SPA limits challenge and frustrate the implementation of the requisite planning instruments and ultimately the development of a key piece of land within the Major Transit Station Area and Dundas Connects Master Plan.

The City has long planned for the Subject Lands to be redeveloped for a mix of uses, which would include sensitive residential uses (subject to further planning investigation and technical support), and recommending some of the greatest heights and densities on the Subject Lands as per its key Gateway location. Our team generally agrees with the principles put forward by the City, in this respect.

The development proposal being pursued under the forthcoming Applications support the vision for PMTSAs and the direction of the Dundas Connects Master Plan, as well as principles of transit oriented development and complete communities and achieves provincial objectives for the expedient supply of housing in strategic areas.

Conclusion

Releasing our Subject Lands from the SPA would not put to risk the City's work associated with the implementation of the flood mitigation strategy resulting from the Schedule 3 Environmental Assessment, preclude or hinder other lands from developing in the future, and in fact, better support Provincial and local objectives related to the expedient delivery of housing.

In terms of our Subject Lands as related to the balance of the SPA lands, it is our opinion that our Subject Lands represent a fundamentally different and unique scenario than the balance of the lands in the SPA as the limits of the floodplain mapping do not capture any of the lands municipally addressed as 1403 Dundas Street and only minimally captures lands municipally addressed as 1425 Dundas Street. The lands subject to this request are located at the westerly boundary of the limits of the SPA, and therefore would not fragment lands or fragment the floodplain boundary. This would be a straightforward adjustment to the westerly boundary of the SPA to recognize the true limits of the floodplain mapping as shown on the updated TRCA mapping. The decision to omit our Subject Lands from the SPA is entirely based on the true limits of the floodplain mapping and the intent of the policies outlined in the SPA. Even if it were the case that the Subject Lands were purposefully captured in their entirety so they could be part of the Schedule 3 Environmental Assessment, that work has advanced to a point where it can be reasonably determined that our Subject Lands are not needed to implement the flood mitigation solutions, nor do the Subject Lands depend on the implementation of such solutions to be development ready.

At its core, the SPA is intended to capture lands situated within a spill zone associated with the Little Etobicoke Creek, and the mapping in the City's 2051 OP does not accurately represent the limits of the TRCA floodplain mapping. This suggests that the application of the floodplain mapping is imprecise and far exaggerated when evaluated against its intended purpose, which is defining the SPA, by capturing an exorbitant amount of lands that are flood free. This consequently frustrates the City's goal for the introduction of housing to support transit investment at a gateway location within the City.

In closing, the City's 2051 OP and policies of the SPA permit development on lands outside the floodplain area. 93% of the Subject Lands are located outside of the floodplain area. Removal of the SPA over the flood free lands helps to accelerate the provision of housing pursuant to Bill 23, Bill 17 and more generally, the redevelopment of lands in key strategic growth areas.

This request would ultimately culminate in the expedient delivery of redevelopment of an underutilized parcel of land through infill intensification within a settlement area where municipal services, including high-order transit and frequent public transit, are and are planned to be available. This would provide for new housing options and make efficient use of land, contributing to the creation of a complete community. Continuing to keep in place the exaggerated mapping constraints associated with the floodplain mapping inaccuracies would frustrate and challenge the timely delivery of much needed housing.



We request that the limits of the Dundas SPA be undertaken prior to the Province's final approval of the City's 2051 OP.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Maurice Luchich, MCIP RPP
Senior Associate



Sarah Clark, MCIP, RPP
Associate

Attachments:

Tab A – Aerial Context Plan

Tab B – Updated TRCA Floodplain Mapping

Tab C – CF Crozier & Associates, “Evaluation of the Preferred Solution”



AERIAL CONTEXT PLAN

1405 & 1425 DUNDAS STREET E.
CITY OF MISSISSAUGA
REGIONAL MUNICIPALITY OF PEEL

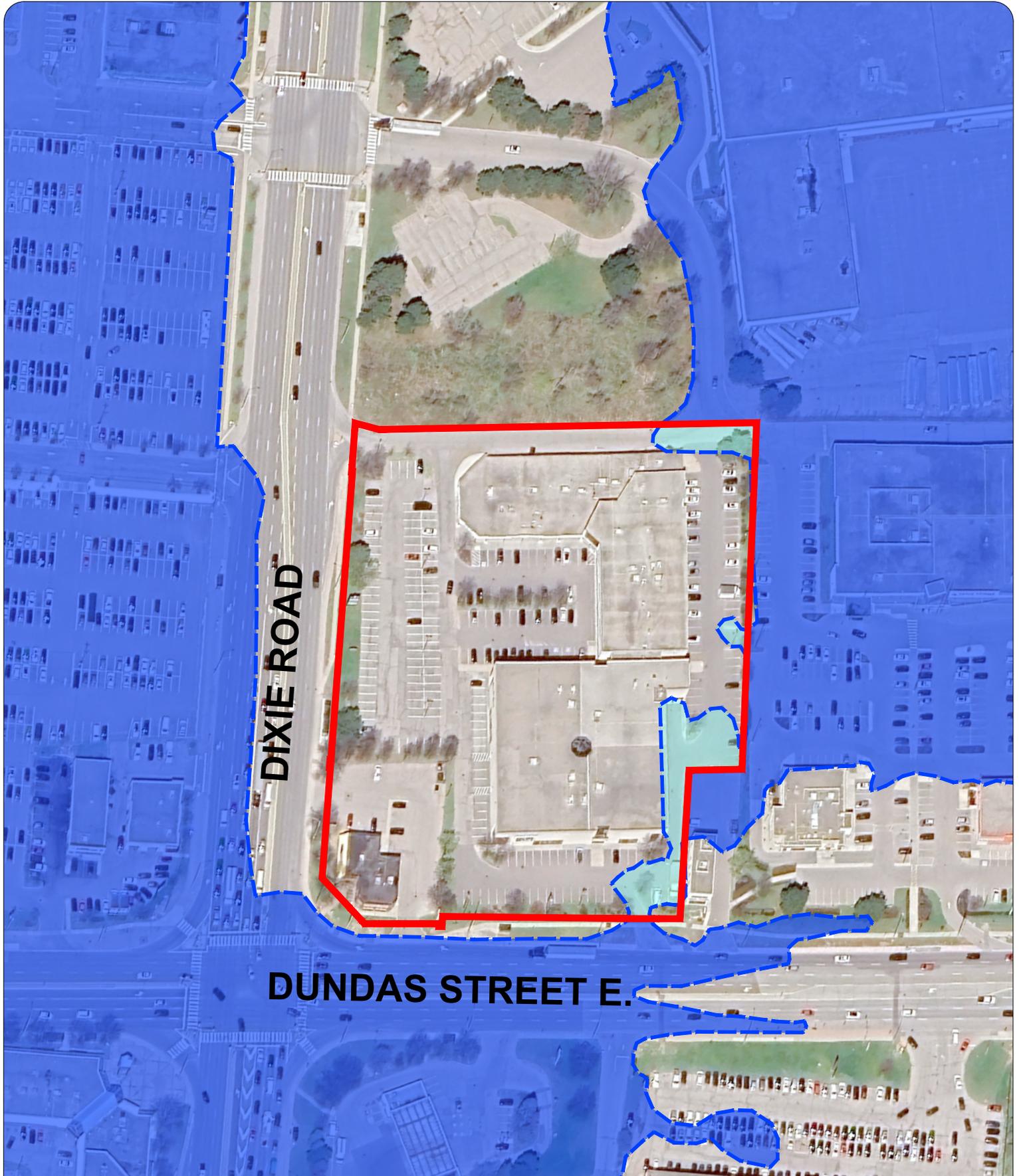


SCALE: N.T.S.
JULY 15, 2025

LEGEND

-  Subject Lands
-  Dixie GO Station





AERIAL CONTEXT PLAN

1425 DUNDAS STREET E.
CITY OF MISSISSAUGA
REGIONAL MUNICIPALITY OF PEEL



SCALE: N.T.S.
MARCH 19, 2025

LEGEND

-  Subject Lands - ±2.14ha (5.29ac)
-  Lands off Site situated within TRCA Floodplain Mapping
-  TRCA Floodplain Mapping (2015)
-  Lands on Site situated within TRCA Floodplain Mapping - ±0.15ha (0.37ac)