

July 24, 2025

Our File: 1315-002

(Via Email)

Hon. Robert Flack  
Ministry of Municipal Affairs and Housing  
777 Bay Street  
Toronto, ON M7A 2J3

**Re: City of Mississauga Official Plan 2051  
Provincial File: ERO #0250465  
CRW 1 L.P., CRW 2 L.P.;  
2105, 2087, 2097, 2207 Royal Windsor Drive  
Region of Peel, City of Mississauga**

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Glen Schnarr and Associates Inc. (GSAI) is pleased to provide this Comment Letter in relation to the Council adopted Mississauga Official Plan 2051, currently under review by the Ministry of Municipal Affairs and Housing (ERO No. 0250465, Ministry Reference # 21-OP-249936), on behalf of our clients CRW 1 L.P. and CRW 2 L.P. (the “Owner”), owners of the properties municipally addressed as 2105, 2087, 2097, 2207 Royal Windsor Drive in the City of Mississauga (“Subject Lands”). The Subject Lands are located within the Clarkson GO Protected Major Transit Station Area, as delineated by the Region of Peel Official Plan and City of Mississauga Official Plan.

The Subject Lands are currently under active planning applications, being, applications for an Official Plan and Zoning By-law Amendment (OZ-22-031), and Site Plan Application (SPA-112477) (together, “the Applications”). The Applications propose four apartment buildings of 25, 31, 35 and 35 storeys containing 1,418 units with commercial uses, live/work units at grade and parkland. The locational advantages of this site and the characteristics of the proposed development would allow it to act as a catalyst and to anchor a complete transit-oriented community, provide much needed and diversified housing units from the broader community, all of which serves to fulfil City and Provincial planning goals and objectives.

**We make this submission to the Province to request that our Client’s lands be appropriately designated and assigned site specific Official Plan policies to permit for the proposed development through a Ministerial Modification to the Council endorsed Mississauga Official Plan (2051).**



Through the City's review of their Official Plan the lands are proposed to be designated as "Mixed Employment" (Schedule 7, Schedule 8r, respectively) which has no residential land use permissions. For the benefit of the Province (and for greater context), we note that the City's Clarkson GO Major Transit Station Area Master Plan Study is also underway (and has been for a significant amount of time) and is intended to be adopted alongside the City's Official Plan, and to our understanding (to date), does not consider a land use designation which would permit for the proposal considered under the Applications. The development application maintains the general intent of the City's Master Plan Study as illustrated through the proposed road network, land uses including commercial and open space, as well as opportunities for connectivity and place-making along the proposed new main street.

Historically, the Owner has made formal submissions on both the Mississauga Official Plan Review and Clarkson GO Major Transit Station Area Master Plan Study requesting that the City recognize and implement a land use designation and accompanying site-specific policies to implement the Development Proposal. Despite the Owner's multiple submissions to both the Official Plan Review and Clarkson GO Major Transit Station Master Plan Study processes, City staff have not made the requested revisions on the basis that the City believes that the request should continue to be assessed through the Official Plan Amendment process. To reiterate for clarity, our client is seeking recognition of the requested Official Plan Amendment detailed with policy, designation and other applicable revisions filed through OZ-22-031.

If this request to the Province is accepted and adopted as a Ministerial modification, the Owner would effectively abandon the active Official Plan Amendment Application. Then, the Owner can address any outstanding technical matters associated with the Applications through the ongoing Zoning By-law Amendment application (currently OZ 22-31 W2) and Site Plan Application (SPA-112477).

We make this submission to the Province on the basis that the existing land use designation does not permit for the development proposal which hinders the delivery of much-needed housing amid a housing crisis in Mississauga and across the province. Redesignating the Subject Lands through the Province's review or modifications process of the City's Official Plan 2051 will ensure a clear and efficient process for all stakeholders and facilitate faster and appropriate housing development.

For the benefit of the Province, we have appended the following material:

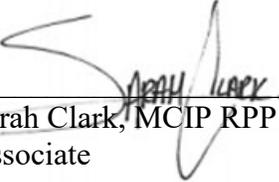
- Copies of submissions to the City regarding the City of Mississauga Official Plan (2051) review and the Clarkson GO Major Transit Station Area Study.

Thank you for your attention to these matters. Please feel free to contact us if you have any questions, require more information, or wish to discuss further.



Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



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Sarah Clark, MCIP RPP  
Associate

March 25, 2025

Our File: 1315-002

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

Attn: Members of Planning and Development Committee

**Re: Clarkson GO Major Transit Station Area – Update and Next Steps (Item 6.3)**  
**Associated City File No.: OZ-22-031, SPA-112477**  
**CRW 1 L.P., CRW 2 L.P.;**  
**2105, 2087, 2097, 2207 Royal Windsor Drive, City of Mississauga**

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Glen Schnarr & Associates Inc. (GSAI) makes this submission in response to Clarkson GO Major Transit Station Area – Update and Next Steps, on behalf of our clients CRW 1 L.P. and CRW 2 L.P. (“The Owner”), owners of the properties municipally addressed as 2105, 2087, 2097, 2207 Royal Windsor Drive in the City of Mississauga (“Subject Lands”).

The Owner has made several formal submissions to both the Mississauga Official Plan Review and the Clarkson GO Major Transit Station Area Master Plan Study in the past. The Owner takes interest in both processes considering its active applications for the Subject Lands: Official Plan and Zoning By-law Amendment (OZ-22-031), and Site Plan Application (SPA-112477) (together, “the Applications”). These submissions generally requested that staff prepare the mapping and associated policies to recognize the Applications.

After meeting with staff to express our concerns made in our former submissions, we were encouraged to see the revised Mixed Use Area designation however, disappointed to see that staff did not acknowledge and have not recognized the Applications in their entirety, notwithstanding the Mixed Use Area designation. We are also disappointed to learn that staff do not plan to draft policies that would permit for the development proposal through the policy drafting exercise (which they are seeking direction from the Committee to advance). This means that staff would require that the land use policies to permit for the proposal would be brought forward through the private Applications, meaning, an amendment to the new Official Plan would be required (for matters such as height, which is presently restricted to 25 storeys). We find this interesting and counterintuitive considering staff are trying to limit the amount of privately initiated Official Plan Amendments to the new Official Plan. It is our opinion that staff should consider drafting site-specific policies which permit for the proposal in the City’s Official Plan and allow the Owner to address any outstanding technical matters associated with the Applications through the ongoing Zoning By-law Amendment application (OZ 22-31 W2) and Site Plan Application (SPA-112477).

Finally, we continue to reiterate our concerns from our previous submissions surrounding amendments to the maps to align with this development application including site programming, location of park(s), future roads and retail/commercial frontages and permitted heights. Should staff not accommodate mapping changes to recognize the active Applications, we would request that staff ensure that clear language is



incorporated into the future policies that ensure flexibility to explore the location of these features through site specific, privately led applications.

Thank you for your attention to these matters. Please feel free to contact us if you have any questions, require more information, or wish to discuss further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Glen Broll, Managing Partner  
MCIP, RPP

cc. Councillor Alvin Tedjo  
Andrew Whittemore, Commissioner of Planning, City of Mississauga  
Jason Bevan, Director of Planning Strategies  
Rodney Gill, Goodmans LLP

Partners:

**Glen Broll**, MCIP, RPP

**Colin Chung**, MCIP, RPP

**Jim Levac**, MCIP, RPP

**Jason Afonso**, MCIP, RPP

**Karen Bennett**, MCIP, RPP

*In Memoriam, Founding Partner:*

**Glen Schnarr**

February 14, 2025

Our File: 1315-002

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

Attn: Ben Phillips, Project Manager  
Amina Menkad, Project Lead

**Re: City of Mississauga Official Plan 20251 Review**  
**Associated City File No.: OZ-22-031, SPA-112477**  
**CRW 1 L.P., CRW 2 L.P.;**  
**2105, 2087, 2097, 2207 Royal Windsor Drive, City of Mississauga**

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Glen Schnarr & Associates Inc. (GSAI) is pleased to make this submission in response to the City of Mississauga draft Official Plan policies dated January 21, 2025, on behalf of our clients CRW 1 L.P. and CRW 2 L.P. (“The Owner”), owners of the properties municipally addressed as 2105, 2087, 2097, 2207 Royal Windsor Drive in the City of Mississauga (“Subject Lands”).

The Owner has made formal submissions to both the Mississauga Official Plan Review and the Clarkson GO Major Transit Station Area Master Plan Study. The Owner takes interest in both processes considering its active applications for the Subject Lands: Official Plan and Zoning By-law Amendment (OZ-22-031), and Site Plan Application (SPA-112477) (together, “the Applications”).

### **Background – Procedural Context**

- The City planned to progress the Clarkson GO Major Transit Station Master Plan Study in tandem with the City’s Official Plan Review.
- At a meeting held between the City and GSAI on January 7, 2025, City staff advised that the Clarkson GO Major Transit Station Master Plan Study would be delayed.
- Consequently, the City’s Official Plan Review will proceed ahead of the Clarkson GO Major Transit Station Master Plan Study.

### **Material Issues**

- Draft Official Plan *Schedule 8r Clarkson GO PMTSA* considers the Subject Lands for a Mixed-Employment designation. This designation includes draft policies that prohibit residential uses. This is directly counter to the City’s own Land Use Compatibility Studies and Public Meeting (March 22, 2023) to declare that residential uses are feasible on the Subject Lands, and in the Clarkson MTSA.
- Despite the Owner’s formal submissions to both the Official Plan Review and Clarkson GO Major Transit Station Master Plan Study processes, City staff have not recognized the Applications from a land use planning perspective and have not proposed a land use designation which would permit for the development proposal.

### Recommended Resolution

- **We request City staff consider redesignation of the Subject Lands to Mixed Use with Residential Permissions through the forthcoming Official Plan Review work.**
- It is expected that when the Clarkson GO Major Transit Station Master Plan Study is completed, the MTSA plans will reflect the land use designation in place under the City's Official Plan.
- If that request is accepted, the Owner can address any outstanding technical matters associated with the Applications through the ongoing Zoning By-law Amendment application (OZ 22-31 W2) and Site Plan Application (SPA-112477).

### Closing Remarks

The existing land use designation is overly restrictive, counter to the City's own reporting, and hinders the delivery of much-needed housing amid a housing crisis in Mississauga and across the province. Redesignating the Subject Lands through the City's Official Plan Review process will ensure a clear and efficient process for all stakeholders and facilitate faster and appropriate housing development.

Finally, we reiterate our concerns from our submission on the Clarkson MTSA Master Plan Study (dated December 6, 2024) which requests acknowledgement of the active Applications (OZ 22-31 W2), and that staff propose amendments to the maps and policies to align with this development application including amendments to the permitted uses, site programming and permitted heights under proposed Map 10, of the Clarkson MTSA Master Plan Study.

Thank you for your attention to these matters. Please feel free to contact us if you have any questions, require more information, or wish to discuss further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Glen Broll, Managing Partner  
MCIP, RPP

cc. Councillor Alvin Tedjo  
Andrew Whittemore, Commissioner of Planning, City of Mississauga  
Rodney Gill, Goodmans LLP

December 6, 2024

Our File: 1315-002

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

Attn: Chair & Members of Planning and Development Committee

**Re: Clarkson GO Major Transit Station Area – Master Plan**  
**City Ref.: CD.21-CLA, Item 6.2 - Clarkson GO Major Transit Station Area Master Plan (Ward 2)**  
**Associated City File No.: OZ-22-031**  
**Ownership: CRW 1 L.P., CRW 2 L.P.;**  
**Properties: 2105, 2087, 2097, 2207 Royal Windsor Drive, City of Mississauga, ON**

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Glen Schnarr & Associates Inc. (GSAI) makes this submission in response to item 6.2 on the December 9, 2024, Planning and Development Committee agenda related to the Clarkson GO MTSA Master Plan. We make this submission to the Chair and the Members of Planning and Development Committee (with a copy to Planning staff).

GSAI are the planners for CRW 1 L.P., CRW 2 L.P. (“The Owner”), who has filed a Site Plan Application and Official Plan and Zoning Amendments (“The Applications”), for the properties municipally addressed as 2105, 2087, 2097, 2207 Royal Windsor Drive (herein referred to as the “Subject Lands”, “The Site”).

The Subject Lands are generally located north of Royal Windsor Drive, west of Southdown Road, and immediately south of the Clarkson GO Station, the heart of the Clarkson MTSA and corresponding Clarkson MTSA Study and subsequent Report.

Since 2018, the Owner has worked collaboratively with the City of Mississauga Planning Staff, Councillors, and former Mayor Crombie to advance a residential development on this Site; over 30 meetings have been held with these individuals. The intent has always been to progress the Applications in tandem with the City’s own Master Plan work, and the ongoing Housing Supply Action Plans released from the Provincial government.

While the Owner has remained generally supportive of the direction and vision for the Clarkson MTSA Master Plan, we provide the following comments with respect to the above referenced site and active application:

- 1. The Report's recommendations should acknowledge the active application OZ 22-31 W2 and propose amendments to the maps and policies to align with this development application.**
  - Specifically, the heights proposed Map 10, Clarkson MTSA Master Plan (*excerpt*) do not reference or acknowledge active applications, including those dating to 2022.

**2. The Report recommendations should include exemption or alternative policies for the lands within the expanded Clarkson Community Node.**

- These policies should address and accommodate existing or potential conflicts with the City's Official Plan, particularly the City Structure and Hierarchy policies. Community Nodes and Major Transit Station Areas/Strategic Growth Areas have conflicting policy frameworks. Notwithstanding the height permissions through the MTSA work, the Community Node policies only permit 4 storeys.
- The future policy framework requires acknowledgment of this to ensure policies are read and interpreted consistently between Staff and Proponents/applicants.
- This is required beyond what OP would typically envision for Community Nodes (ie. policies in the Official Plan with respect to heights and densities in Community Nodes as well as retaining historical significance of community nodes).

**3. The language in the Clarkson Master Plan should provide greater flexibility, acknowledging that application evolve through site specific planning.**

- The first Key Recommendation of the Clarkson Master Plan is, “*a vision and set of guiding principles to help shape future development*”. It is encouraging to see reference to the MTSA Plan as “guiding principles” and not that a development must “match” or “be identical to” the Plan provided. This principle should be maintained, as development applications are reviewed
- We note the following language is included in the Clarkson Master Plan: “*The exact size, location and configuration of future parks will be determined through the development approvals process.*”. While this is in specific reference to Parks, this could be reasonably applicable to building design, street design, etc.
- This flexibility is required to ensure applications evolve through site specific planning and design and do not force plans to adhere to the MTSA Master Plan as presented; this represents responsible urban planning and development that respects the existing and future context of the area.

Thank you for your attention to these matters. I trust these additional recommendations will contribute to ensuring alignment and consistency within the planning framework. Please feel free to contact us if you have any questions, require more information, or wish to discuss further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Glen Broll, Managing Partner  
MCIP, RPP

June 28, 2024

GSAI File: 1315-002

(Via Email)

Mr. Ben Phillips  
Project Manager, Official Plan Review  
Planning & Building Department  
City Planning Services Division  
300 City Centre Drive  
Mississauga, ON L3B 3C1

**RE: Mississauga Official Plan Review - Comments  
CRW 1 LP and CRW 2 LP  
2077-2105 Royal Windsor Drive, City of Mississauga**

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Glen Schnarr & Associates Inc. (“GSAI”) is pleased to submit this correspondence on behalf of our client, CRW 1 LP and CRW 2 LP, being the registered owner of 2077-2105 Royal Windsor Drive.

This letter is to state concerns for the recently presented draft City of Mississauga Official Plan (the “**Draft MOP**”).

There are specific policies found in the Draft MOP, such as those provided in Section 11.3 (Land Uses) which are problematic or concerning for current and future development applications. For example, Policy 11.3.2 regarding the replacement of non-residential gross floor area reads as follows:

*‘Redevelopment within Mixed Use, Mixed Use Limited, and Downtown Mixed Use designated lands that results in a loss of non-residential floor space, will not be permitted unless it can be demonstrated that the planned function of the non-residential component will be maintained or replaced as part of the redevelopment.’*

This policy as drafted has the potential to negatively influence mixed-use development applications, especially those in Major Transit Station Areas. The policy is rigid. It appears to be a response to redevelopment proposed for mixed-use sites or plaza sites. However, it fails to balance the relevant considerations that go into whether there should be replacement of non-residential gross floor area. Recognizing that non-residential gross floor area is relevant to serving

the community needs of existing and planned neighbourhoods, requiring a 1:1 replacement ratio (or close to) can be detrimental to the optimization of available lands and could result in unintended or unplanned vacancies of non-residential units based on existing and future demand. The replacement of non-residential floor area is better evaluated through an understanding of market conditions/demand and a geographical evaluation of the access and amount of floor space area provided to immediate and surrounding residential and non-residential uses. The policy as proposed is too generic, does not address issues of planned function in consideration of market catchment area, and will act as a detriment to future development applications which introduce the right uses, at the right time, in the right parts of the City.

Thank you for the opportunity to provide these comments. Our Client, the Owners, wishes to be included in all further engagement related to the OP 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 by Council.

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.**



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Glen Broll, M.C.I.P., R.P.P.  
Managing Partner



Barristers & Solicitors  
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Toronto, Ontario M5H 2S7  
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goodmans.ca

Direct Line: 416.597.4136  
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February 6, 2023

**Via Email to council@peelregion.ca**

The Council of the Regional Municipality of Peel  
Regional Administrative Headquarters  
10 Peel Centre Drive, Suite A  
Brampton, Ontario

**Attention: Chair and Members of Council**

Dear Sirs/Mesdames:

**Re: Agenda Item 13.1 – City of Mississauga Major Transit Station Area Official Plan Amendments 142, 143, 144 and 146: Regional Staff Review and Recommendations Submission on behalf of CRW 1 LP and CRW 2 LP  
City of Mississauga Official Plan Amendment Nos. 142, 143, 144 and 146**

We are solicitors for CRW 1 LP and CRW 2 LP, the owner of the properties known municipally in the City of Mississauga (the “**City**”) as 2077-2105 Royal Windsor Drive (the “**Property**”). We write on behalf of our client to express its strong objections to the City Official Plan amendments that are before Regional Council (the “**City OPAs**”).

As outlined further below, the City OPAs suffer from fundamental flaws that undermine Regional objectives, policy direction in the newly-approved Region of Peel Official Plan (the “**ROP**”), and explicit direction that the Minister of Municipal Affairs (the “**Minister**”) provided in modifying the ROP. In particular, the proposed approach of including height limits within certain PMTSAs contravenes Ministerial modifications to the ROP and, if approved, would result in the need to accommodate more housing in other areas of the Region that are less able to accommodate it. Furthermore, Regional staff have not even evaluated whether the height policies conform to provincial policy or the ROP, as they have inappropriately limited the scope of their review to ensuring minimum densities are met.

In addition, we note that changes in circumstances since City Council first adopted the City OPAs make it unfair and inappropriate to approve the City OPAs without giving City Council a further opportunity to consider them. In particular:

- The version of the ROP that Council used to evaluate the City OPAs at the time of adoption has now been superseded with an approved version that is different in important ways following the Minister’s modifications;

- The Province has released new housing targets which call for the City to accommodate 120,000 new homes by 2031, which has significant implications on the amount of intensification to be accommodated within the City's major transit station areas ("MTSAs"); and
- As a result of the intervening election, City Council as currently constituted has not had an opportunity to consider the City OPAs (which were adopted by the previous Council with different members).

In these circumstances, our client strongly urges Regional Council to refuse to approve the City OPAs and remit them to the City for further consideration.

### **The Policies Pertaining to Maximum Heights are Inappropriate**

Our client has particular concerns with the policies in the City OPAs providing direction on heights and the maximum heights identified in associated mapping. The imposition of maximum heights does not conform with provincial policy or direction provided from the Minister in approving the ROP. Further, Regional staff appear to have a fundamental misapprehension about the role of the Region as approval authority. This misunderstanding appears to be the basis for Regional staff not recommending changes to the aspects of the City OPAs relating to maximum heights.

### **The Maximum Height Policies do not Conform with Provincial or Regional Policy**

Both the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe promote intensification, particularly around transit stations, to facilitate complete communities that leverage public investment in transit and reduce reliance on vehicles. Under provincial policy, it is not enough simply to allow some degree of intensification in these areas – the Growth Plan provides that it is imperative that existing and planned transit be optimized to support more compact built form and ensure growth is accommodated in the right locations. The ROP mirrors this direction. Policy 5.4.18.6 provides that the Region's objective is "[t]o optimize all intensification opportunities across the Region and maximize development within Strategic Growth Areas."

The importance of the direction to optimize MTSAs is apparent in the modifications the Minister made to the ROP before approving it. Specifically, the Minister struck language in the ROP that required lower-tier municipalities, in planning for their MTSAs, to address maximum heights at their discretion. Following the Minister's modification, the only direction in the ROP pertaining to heights for PMTSAs is that lower-tier municipalities are to establish minimum heights. Indeed, the direction to provide for minimum heights in MTSAs is the only reference to building height in the entirety of the ROP.

Importantly, the City OPAs were adopted before the Minister had reviewed and modified the ROP. Accordingly, at the time the City OPAs were adopted, the ROP policies that City Council was evaluating the City OPAs against permitted the imposition of maximum heights in MTSAs. It no longer does so. In these circumstances, at a minimum, City Council must have an opportunity to consider the City OPAs against the new policy framework that now applies, including in light of the Minister's removal of policy language in the ROP pertaining to maximum heights.

Furthermore, even if maximum heights were permitted, the proposed maximums set out in the City OPAs are inappropriate. The maximum heights are woefully unresponsive to both provincial and Regional policy direction. Maximum building heights at these levels do not optimize the public investment in higher-order transit, nor do they maximize development within MTSAs as strategic growth areas. Suppressing building heights, and therefore new housing stock, to such an extent along areas with existing and planned rapid transit within the City will have knock-on effects elsewhere in the Region, increasing growth pressures in areas of the City without such infrastructure and in other municipalities. The City OPAs cannot be considered to conform with provincial or Regional policy and therefore must not be approved.

### **Regional Staff Appear to Misunderstand the Region's Role as Approval Authority**

Unfortunately, Regional staff have sidestepped the critical issues relating to the maximum height policies in their report to Regional Council. The report indicates that building heights “only become a matter of Regional interest if” they indicate that “the minimum densities in the [ROP] have not been adequately planned for.” This represents a fundamental misunderstanding of the Region's role as approval authority for the City OPAs.

Under the *Planning Act*, the Region, as approval authority, must be satisfied that the City OPAs conform with provincial policy and the ROP in order to approve them. The Region cannot only concern itself with minimum densities. It must ensure conformity with all aspects of applicable policy. Section 3(5) of the *Planning Act* requires Regional Council's decision to be consistent and conform with provincial policy. Further, section 17(34.1) of the *Planning Act* specifically prohibits the Region from approving the City OPAs if they do not conform with the ROP.

Based on the staff report before Regional Council, it appears that staff have not even evaluated whether the policies in the City OPAs pertaining to maximum building height conform with direction in the ROP, including the direction to optimize all intensification opportunities in the Region and maximize development within strategic growth areas. As outlined above, it is plain that the maximum height policies do not achieve conformity. Regional Council cannot approve the City OPAs in these circumstances.

### **Conclusion**

The imperative of optimizing available supply of land to support complete, mixed-use communities in the vicinity of higher-order transit is clear, both in provincial policy and the ROP. Unfortunately, the City OPAs do not adequately reflect this fundamental direction. In these circumstances, and in light of the substantial changes in circumstances since City Council (as previously constituted) adopted the City OPAs, our client urges Regional Council to refuse to approve the City OPAs and remit them to the City, with direction to reconsider the maximum height policies.

We appreciate the opportunity to provide these comments and thank Council for its consideration.

Yours truly,

**Goodmans LLP**

A handwritten signature in blue ink, appearing to read "Rodney Gill", is written over a light-colored rectangular background.

Rodney Gill  
RJG/

cc: Client

7344805

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

October 5, 2022

Dear Sir/Mesdames,

**Re: Comment on new Peel Region Official Plan  
Ministry Reference Number: 21-OP-215276, ERO Number:  
2077-2105 Royal Windsor Drive, City of Mississauga**

This comment is submitted on behalf of CRW 1 LP and CRW 2 LP (the “**Owner**”), the owner of the lands municipally addressed as 2077-2105 Royal Windsor Drive, in the City of Mississauga (the “**Site**”). The Site is within the lands that are covered by the new Peel Region Official Plan that was adopted by Peel Region on April 28, 2022 by By-law 20-2022 (the “**ROP**”) which is now before the Ministry of Municipal Affairs and Housing for a decision.

#### The Site

The Site is located on the west side of Southdown Road and north side of Royal Windsor Drive, south of the Clarkson GO Station and within the proposed Clarkson Major Transit Station Area which is proposed as a Primary Major Transit Station Area (**PMTSA**). The Site presents an important opportunity to leverage transit-oriented development to meet community needs and the Province’s aspirational target to build 1.5 million new homes that will help keep housing costs down for families. Fundamental to achieving the best community outcomes is ensuring that sufficient density, height and use permissions are authorized by the ROPA for the Site.

#### The ROP

The ROP is a key opportunity for the Region of Peel and the Province of Ontario to achieve important objectives like building housing supply that meets homeownership demand, improving sustainability, and promoting economic growth. Provincial policy directs that PMTSAs are to have a sufficient density and mix of land uses that efficiently use land and are transit supportive, including active transportation and the planned transit infrastructure. Areas like the Site require policies within the ROP that promote and require significant intensification while allowing flexibility to account for specific location considerations. An official plan ought to set a long-term vision that is consistent with the Province’s policies and a framework to achieve that vision.



Slate Asset Management  
121 King St W, Suite 200  
Toronto, ON M5H 3T9

The Province's housing objectives will be best supported if the ROP provides the Site with a policy framework that allows for significant intensification that is in keeping with its locational advantages that will allow it to anchor a complete transit-oriented community. That will require flexible employment lands policies that permit residential uses, substantial density minimums with no density maximum, no restrictions on height, and no minimum parking requirements. Further, it is necessary that the ROP be structured so that the City of Mississauga will not be able to place more restrictive requirements on the Site through its Official Plan and implementing Zoning By-laws as noted under Regional policy 5.6.19.11.

Requests

1. That the Site be removed from the Employment Area designation on Schedule E-4 of the ROP;
2. That policy 5.6.19.10 of the ROP be amended so that no maximum density may be established by the local municipality for each Major Transit Station Area;
3. That policy 5.6.19.10 of the ROP be amended so that no maximum height may be established by the local municipality for each Major Transit Station Area; and,
4. That the ROP be amended to preclude the implementation of any mandatory minimum parking requirements within the Clarkson Major Transit Station Area

We ask the Ministry of Municipal Affairs and Housing to consider our above comments and concerns while making a decision on the ROP.

Sincerely,



Lucas Manuel  
Partner, Slate Asset Management



Barristers & Solicitors  
Bay Adelaide Centre  
333 Bay Street, Suite 3400  
Toronto, Ontario M5H 2S7  
Telephone: 416.979.2211  
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Direct Line: 416.597.4136  
rgill@goodmans.ca

August 5, 2022

Our File No.: 193367

**Via Email**

Chairman and Members of Planning & Development Committee  
c/o Megan Piercey, Legislative Coordinator  
City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

**Attention: Megan Piercey, Legislative Coordinator (megan.piercey@mississauga.ca);  
Bashar Al-Hussaini, Project Lead (bashar.al-hussaini@mississauga.ca)**

Dear Sirs/Mesdames:

**Re: Item 5.4 City-Wide Major Transit Station Area Study – Official Plan Amendments  
OPA 143 and OPA 144 (All Wards)  
Written Submissions of CRW 1 LP and CRW 2 LP  
2077-2105 Royal Windsor Drive, City of Mississauga**

We are solicitors for CRW 1 LP and CRW 2 LP (the “**Owner**”) in relation to our clients’ pursuit of planning approvals to implement redevelopment of the lands municipally addressed as 2077-2105 Royal Windsor Drive, in the City of Mississauga (the “**Subject Lands**” or the “**Site**”). On behalf of the Owner, we are pleased to provide this Comment Letter in relation to the ongoing City of Mississauga City-Wide Major Transit Station Area Study and proposed Official Plan Amendments before the Planning and Development Committee for consideration on August 8, 2022 (the “**Draft Official Plan Amendments**”).

The Site

The Subject Lands are located on the west side of Southdown Road and north side of Royal Windsor Drive, south of the Clarkson GO Station and within the proposed Clarkson Major Transit Station Area, which is a Protected Major Transit Station Area (“**PMTSA**”). The Subject Lands are well placed to be redeveloped and deliver high-density transit-oriented land uses.

The Draft Official Plan Amendments

Our clients are generally supportive of the steps taken by the Region of Peel and the City of Mississauga in developing a policy framework for PMTSAs. Planning for PMTSAs is a key

moment and opportunity for municipalities to shape communities and achieve important objectives like the promotion of positive social change, improved sustainability, and economic growth.

Provincial policy provides direction for the land use patterns within PMTSAs. They are to have a sufficient density and mix of land uses that efficiently use land and are transit supportive, including active transportation and the planned transit infrastructure. Likewise, policies within the Region of Peel and City of Mississauga Official Plans promote intensification, appropriate density, and a range and mix of uses around transit to encourage the development of complete communities.

We have reviewed the staff report prepared for the August 8th PDC meeting, LA.07-CIT – 0482-2022 and are concerned with the City's position that no amendments will be permitted to PMTSA policies once implemented. We see an opportunity to be more flexible with potential amendments than what is currently contemplated. An Official Plan ought to set the City's long-term vision and a framework to achieve that vision. The ability to amend Official Plan policies provides a degree of flexibility to account for site-specific considerations that cannot be captured in area-wide studies that inform Official Plan policies. Restrictions on amendments is an unnecessary limitation that potentially undermines good planning for individual sites. Seeking a Council resolution to begin the process of amending a PMTSA policy would cause unwarranted delays in the approvals process for appropriate amendment requests.

We are also concerned with the continued lack of clarity for how active development applications will be impacted by Major Transit Station Area policies. Staff have noted that the Planning Act has no transition clauses in relation to active applications. However, they have not suggested or proposed any vehicle, including the addition of transition provisions in the Draft Official Plan Amendments, for reducing the uncertainty.

We ask the City to consider our above comments and concerns while finalizing the Draft Official Plan Amendments.

Please also accept this letter as our request for notice of all decisions made in respect of this matter.

Yours truly,

**Goodmans LLP**



Rodney Gill  
RGI/