

July 11, 2025

Our File: 1101-004

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

Attention: Jennifer Le, Municipal Services Office, Central Ontario

RE: Mississauga Official Plan 2051 Review
ERO Number: 025-0468
Ministry Reference: 21-OP-249936
Moldenhauer Corporation & Various Owners
Various Properties, City of Mississauga

Glen Schnarr and Associates Inc. ('GSAI') are the planning consultants to the current and potential future 'Owner' of a number of sites which are generally located north and south of Royal Windsor Drive, on the west side of Southdown Road in the City of Mississauga (the 'Subject Lands'). We are making this submission to the Province in response to the City of Mississauga draft Official Plan policies and mapping posted to the ERO June 10, 2025.

The lands subject to this submission are situated south of and proximally to the Clarkson GO Station (a 'Primary Major Transit Station Area' or 'PMTSA'). We have appended an Aerial Image along with property addresses which should be reviewed as part of this submission. Some lands are not under ownership of our Client (currently), however have been included in this submission as the request should be reviewed comprehensively with all lands within the Major Transit Station Area. As shown on the Aerial Image, this area of the city hosts a range of land uses including (however not limited to) industrial, commercial and residential uses.

We are making this submission to the Province to request that **the limits of the Clarkson GO Primary Major Transit Station Area boundary be extended to include the properties identified on the appended Aerial Image and to redesignate the lands within the new PMTSA boundary to "Mixed Use Limited" or "High Density Residential"** with non-residential use permissions.

The Provincial Planning Statement 2024 provides that planning authorities shall delineate the boundaries of Major Transit Station Areas on higher order transit corridors through a new official plan or official plan amendment adopted under Section 26 of the Planning Act. Major Transit Station Areas, by definition through the PPS 2024, includes language that inherently provides a degree of flexibility, stating that

PMTSA's are generally defined as the area within an approximate 500 to 800-metre radius of a transit station that maximizes the number of potential transit users that are within walking distance of the station. Staff will note the requested lands extend beyond 800m, however, Based on the generality of the prescription of the PMTSA radius and the general intent of planning for PMTSA lands, our request to the Province is consistent with the Provincial definition of PMTSAs and the intended function of PMTSAs. In fact, it better represents the purpose of MTSA's and the general vision of planning for lands located proximal to a transit station (being the Clarkson GO, in this instance).

The PMTSA limits as presently delineated in the City's Official Plan) do not fully encompass lands with development potential and falls short of achieving the principles of transit-oriented development. Specifically, parts of the PMTSA limits (east of Southdown Road) are realistically the final built conditions with very little opportunity for future growth. The PMTSA arc limit is undersized going south from the GO transit facility (and MiWay bus terminal). Extending the arc of the PMTSA further south properly captures lands with access to the Clarkson GO, provides for an area with potential for future intensification and also makes up for the lack of the PMTSA arc which has not been provided further north. This request presents a logical, progressive and opportunistic approach to land use planning for strategic growth areas through opening up lands for redevelopment and/or infill of brownfield or greyfield sites.

We have requested that Provincial staff also consider the redesignation of lands captured within the Aerial Context Plan. We are of the opinion that the Subject Lands should be given further consideration to permit non-employment related land uses on site, as this would support long-term municipal, regional and provincial planning objectives for the strategic co-location of uses and creating mixed use communities that promote transit ridership and more sustainable living. With this, we do note the importance of allowing the existing uses in the catchment area to be supported by Official Plan policies place which permit continued use of the commercial/employment/industrial uses in the interim as well as expansion of the existing uses or permitted uses, if deemed appropriate.

With the MTSA limits broadened, the City still has the opportunity to review and evaluate Development Applications through the review process. It should be a priority for the City and the Province to provide flexibility in the Official Plan which provides opportunity for redevelopment and responds to the changing climate of the City without imposing additional policy barriers which could frustrate logical, appropriate and sequential development, particularly in key areas, such as those accessible by transit and capable of supporting transit-oriented development. Expanding the PMTSA boundaries would apply Official Plan policies which better support Provincial objectives and capitalize on available lands for redevelopment in proximity to transit.

Ultimately, redevelopment of vacant or underutilized sites within PMTSA lands is the objective of our Client. Our request to the Province facilitates that opportunity. Our Client is seeking to expeditiously advance Planning Applications within the 2051 Planning Horizon. Implementation of the appropriate Planning tools, including Official Plan policies and designations is an instrumental first step to realizing development potential in strategic areas. The broadening of the PMTSA limits to encompass more lands for (re)development would be the initiation for meaningful development and preparation of comprehensive area plans to build out the lands north and south of Royal Windsor Drive, subject to further technical review.

Expanding the limits of the PMTSA would support the principles of both transit-oriented development with appropriate pedestrian-accessible lands and complete communities. Aside from the introduction of much needed housing, the request would also bring forward economic development benefits and create jobs for the area, all of which are objectives that align with and support Provincial goals/targets. The lands subject to this request are proximal to an identified gateway and should be recognized for future development potential.

Further to the above, we note that under Bill 17, the *Transit Oriented Communities Act* was amended to provide that:

Designation of transit-oriented community land

2 (1) The Lieutenant Governor in Council may, by order in council, designate land as transit-oriented community land if, in the opinion of the Lieutenant Governor in Council, it is or may be required to support a transit-oriented community project.

We are of the opinion that the current delineation and land use strategy proposed for the Clarkson GO MTSA does not fully satisfy the goals and objectives of transit-oriented development and does not leverage or put to the best use public investments in transit infrastructure associated with the Clarkson GO. The Ministerial review of the City's Official Plan is the appropriate time to consider this request and utilize the Ministerial powers granted through Bill 17 and the *Transit Oriented Communities Act*, if necessary and in support of your Ministry's review of this Official Plan in order to support the investment in transit infrastructure and provide policies to permit the most optimal and efficient development of a future transit oriented community within the amended boundaries of the Clarkson GO PMTSA. We recognize that the 800-meter radius in some instances, would only capture portions of certain sites (namely, 2226 Royal Windsor Drive). We would recommend as a forward-thinking precaution, that the MTSA limits be extended to include the entirety of the lands that are captured within the 800-meter radius in order to fully realize development potential and allow the required Planning and development approvals process to vet through the opportunities and constraints for development in the area.

In summary, we are concerned about the overly restrictive nature of the Clarkson GO PMTSA delineation and land uses as outlined in the Official Plan schedules and request that modifications as identified throughout this letter be made on the basis that the subject lands are in proximity to existing transit services, are appropriately positioned to accommodate better use of land, infrastructure and resources and can better support and more quickly advance the achievement of Provincial and local policy objectives, especially in the midst of a Provincial housing crisis. Finally, we want to highlight that the work associated with the Clarkson GO PMTSA has been ongoing for over a decade with the City, and without the assistance of the Province to implement this modification request, willing developers will be burdened with a time intensive land use planning processes that delays the provision of much needed housing. We also remind the Province that the City's PMTSA work is not appealable and therefore, a Ministerial Modification to the City's work through the Official Plan is the last avenue for modification outside of site-specific planning applications which are resource intensive and challenge the efficient delivery of housing and other amenities/services to support the PMTSA investments and greater City. The City's work as shown today, presents major barriers



to development and frustrates lands which could otherwise evolve into a thriving mixed-use community, capitalizing on public infrastructure investments and underutilized lands in a strategically located area.

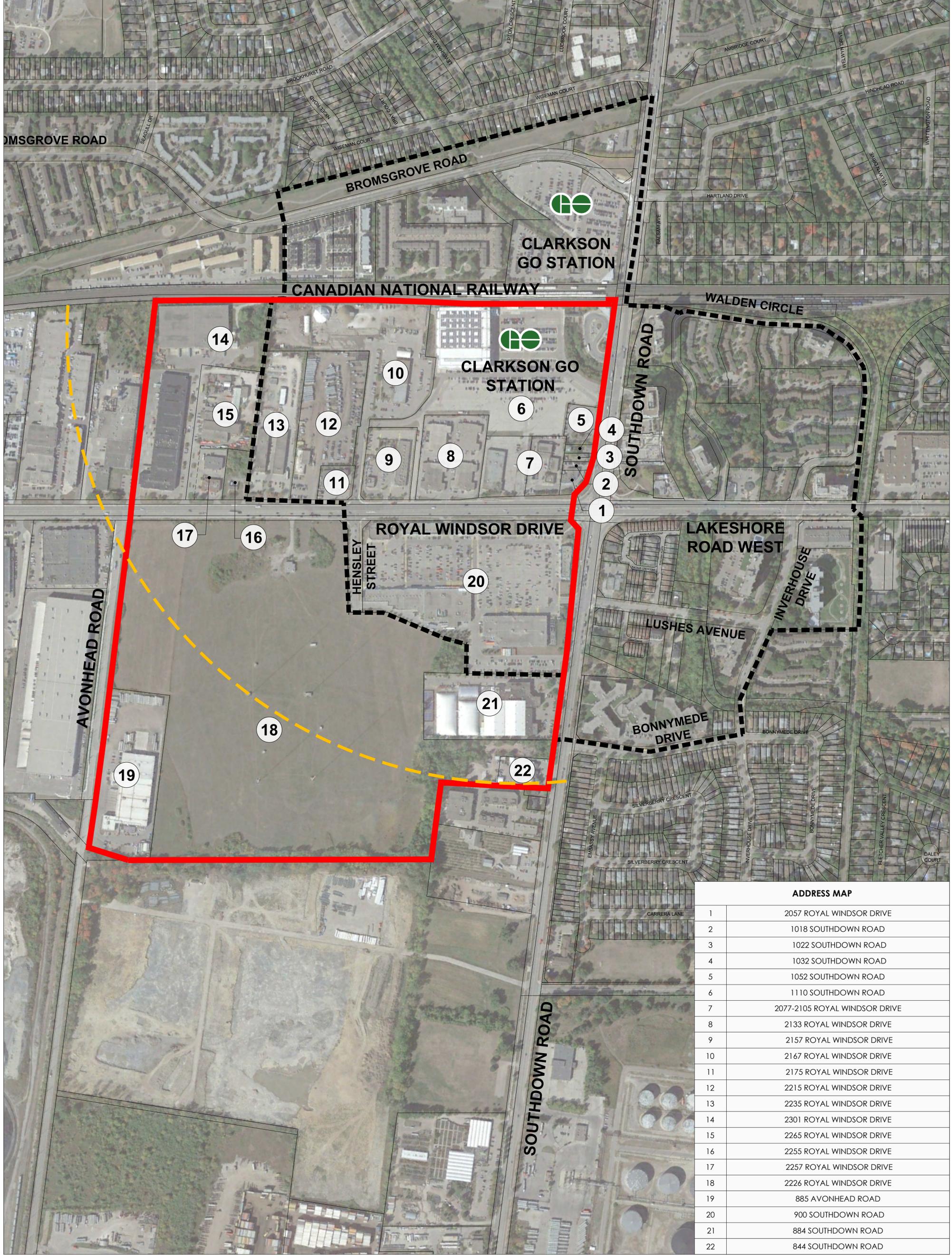
Thank you for the opportunity to provide these comments. We would be pleased to meet at your request. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Glen Broll, MCIP, RPP
Managing Partner

cc. Moldenhauer Corporation



ADDRESS MAP

1	2057 ROYAL WINDSOR DRIVE
2	1018 SOUTHDOWN ROAD
3	1022 SOUTHDOWN ROAD
4	1032 SOUTHDOWN ROAD
5	1052 SOUTHDOWN ROAD
6	1110 SOUTHDOWN ROAD
7	2077-2105 ROYAL WINDSOR DRIVE
8	2133 ROYAL WINDSOR DRIVE
9	2157 ROYAL WINDSOR DRIVE
10	2167 ROYAL WINDSOR DRIVE
11	2175 ROYAL WINDSOR DRIVE
12	2215 ROYAL WINDSOR DRIVE
13	2235 ROYAL WINDSOR DRIVE
14	2301 ROYAL WINDSOR DRIVE
15	2265 ROYAL WINDSOR DRIVE
16	2255 ROYAL WINDSOR DRIVE
17	2257 ROYAL WINDSOR DRIVE
18	2226 ROYAL WINDSOR DRIVE
19	885 AVONHEAD ROAD
20	900 SOUTHDOWN ROAD
21	884 SOUTHDOWN ROAD
22	844 SOUTHDOWN ROAD

AERIAL CONTEXT PLAN

CITY OF MISSISSAUGA,
REGIONAL MUNICIPALITY OF PEEL

LEGEND

-  SUBJECT LANDS
-  CLARKSON GO MTSA AREA
-  800m Arc (MTSA Limit)



SCALE 1:750
JULY 3, 2025

