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February 3, 2022

REGION OF PEEL
OFFICE OF THE REGIONAL CLERK

Clerk's Office
Region of Peel
10 Peel Centre Drive, Suite A and B
Brampton, ON L6T 4B9

February 2, 2022
File 10595

REFERRAL TO _____
RECOMMENDED
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED ☒

Attn: Members of the Planning and Growth Management Committee

**RE: Agenda Item 5.1: Official Plan Review and Municipal Comprehensive Review
Employment Conversion Request Submission (M29)
2025-2087 Dundas Street East, City of Mississauga**

Weston Consulting is the Planner for the owner of lands located at 2025-2087 Dundas Street East in the City of Mississauga (herein referred to as the "subject property"). On November 19, 2021, we submitted an Employment Conversion Request letter for the subject property to be considered as part of the Region's ongoing Municipal Comprehensive Review (MCR) process (Attachment 1). An addendum letter was submitted on November 30, 2021, to provide Staff with supplementary information based on the outcome of two meetings held with City and Regional Staff (Attachment 2). According to the Employment Conversion Analysis Report dated January 2022 (the "Analysis Report"), which informs the recommendation in the February 3, 2022, Planning and Growth Management Committee Report, the subject property is not being recommended for conversion and removal from the Regional employment area.

We have reviewed Staff's analysis of the Employment Conversion Request and do not agree with their assessment that a conversion is not appropriate. In our opinion, the Employment Conversion Request for the subject property meets the tests of the Growth Plan and is consistent with the direction outlined in the Dundas Connects Master Plan to support a mix of uses, including a mix of employment and residential uses, in Focus Areas such as the Etobicoke Creek Focus Area. The purpose of this letter is to request that the Planning and Growth Management Committee consider our request to support the conversion and exclude the subject property from the Regional employment area.

As outlined in our original letter dated November 19, 2021, the subject property is designated *Mixed Use* and is located within the *Dixie Employment Area* according to the Mississauga Official Plan. The purpose of the Employment Area Conversion Request is to add residential use permissions while maintaining the site's existing employment use permissions. The subject property is also located within the Etobicoke Creek Focus Area of the Dundas Connects Master Plan and within the DUN-17 MTSA on the Dundas BRT corridor. In the Analysis Report prepared by Staff, Staff acknowledge that the site was considered for

additional mixed-use permissions such as residential through the Dundas Connects Master Plan, however, despite this, Staff determined that the lands should remain in the employment area designation due to the site's location in the Etobicoke Creek Special Policy Area (SPA).

As discussed in our addendum letter dated November 30, 2021, the Dundas Connects Master Plan recommends updating the Etobicoke Creek SPA in order to support future mixed-use development. Lands within the Etobicoke Creek SPA are associated with overland flooding risks. The landowner has been working closely with the Toronto Region Conservation Authority (TRCA), which is acknowledged by Staff in their Analysis Report, to undertake a further flood analysis, review the natural hazard area and engage in the ongoing review of the Etobicoke Creek SPA boundary. Initial results indicate that residential uses can be accommodated on the site. We recognize that in order for the overall Dundas Connects Master Plan to be fully implemented, a number of key studies, approvals, and investments are required including a review of the Etobicoke Creek SPA and further exploration of flood remediation measures/mitigation measures. In our opinion, the subject property's location within the Etobicoke Creek SPA should not preclude the property from being permitted for a mix of uses, including residential uses. It is understood that the allowance of residential uses on the subject property would be contingent on securing the required approvals and ensuring limited flood risks. The required technical studies and approvals to support residential uses as part of a mixed-use development can be provided at the time of a future development application submission which would be required to proceed through a formal planning review process.

It should be noted that Staff have provided their support for employment conversions for certain *Mixed Use* and *Business Employment* designated lands along Dundas Street within the Dixie Employment Area. This was identified as M2 in the May 2021 Analysis Report. In this previous Employment Conversion Request Analysis Report, Staff supported the M2 conversion on the basis that "*lands proposed for conversion within the Dixie Employment Area lack access to major highways, limiting their potential for warehousing and logistics functions.*" In addition, the employment conversion will support "*transit-oriented development and intensification along Dundas St...thereby contributing to walkable neighbourhoods, and allowing for the achievement of transit supportive densities.*" A conversion for the subject property would also support these objectives for the Dundas Street corridor.

The Analysis Report for the subject property states that land use compatibility with the employment areas to the north would be a key consideration for inclusion of sensitive land uses. However, in the May 2021 Report for the M2 request, Staff indicated that they did consider site compatibility with the remaining adjacent heavy industrial land uses but this was not raised as an issue since Staff provided support for the employment conversion. It appears that there is an inconsistency in how Staff are evaluating Employment Conversion Requests along the Dundas Street Corridor with respect to land use compatibility.

It is our opinion that the Employment Conversion Request for the subject property is appropriate and should be supported. We agree with Staff's comment that additional consideration for compatibility can be considered through the Site Plan Approval process. The Employment Conversion Request for the subject property to permit mixed-use development including for residential uses, will support the achievement of transit supportive densities along the Dundas Corridor, which Staff have stated as part of a justification to support employment conversions along the Dundas Corridor in other cases. As discussed in our previous submission, the landowner is working with the TRCA to address issues related to the Etobicoke Creek SPA. The site's location within the Etobicoke Creek SPA should not be the determining factor for denying this conversion request.

The Employment Conversion Request satisfies the tests outlined in the Growth Plan. Policy 2.2.5.9(b) permits the conversion of lands where it is demonstrated that the lands are not required for employment purposes. This test is satisfied as the Employment Conversion Request seeks to add residential land use permission in support of a future mixed-use development which would include employment uses. Policy 2.2.5.9(d) requires that the proposed use would not adversely affect the overall viability of the employment area. This test is satisfied and discussed above with respect to land use compatibility across the Dundas Street Corridor.

Thank you for the opportunity to respond to the Analysis Report and comments from Staff on the Employment Conversion Request for the subject property. We reserve the right to provide additional comments throughout this process. Should you have any questions, please contact the undersigned.

Yours truly,

Weston Consulting

Per:

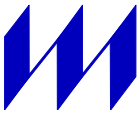


Jenna Thibault, BSc, MPL, MCIP, RPP
Senior Planner

- c. James Bujak, Sorbara Group of Companies
- Ryan Guetter, Weston Consulting
- Tara Buonpensiero, Region of Peel
- Joy Simms, Region of Peel
- Duran Wedderburn, Region of Peel

Attachment 1: Employment Conversion Request letter dated November 19, 2021.

Attachment 2: Employment Conversion letter addendum dated November 30, 2021.



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Regional Planning and Growth Management
10 Peel Centre Drive, Suite A and B
Brampton, ON L6T 4B9

November 19, 2021
File 10595

Attn: Tara Buonpensiero, Manager, Policy Development

Dear Madame,

**RE: Regional Municipal Comprehensive Review (MCR)
Employment Conversion Request Submission
2025-2087 Dundas Street East, City of Mississauga**

Weston Consulting is the Planner for the owner of lands located at 2025-2087 Dundas Street East in the City of Mississauga (herein referred to as the “subject property”). This letter is being submitted as part of the Municipal Comprehensive Review (MCR) process to request an employment land conversion to permit non-employment uses on the subject property in order to support future mixed use development on the site, which would include residential uses.

This letter addresses the Peel Region Employment Area Conversion policies outlined in the Peel 2051+ Preliminary Employment Conversion Analysis, dated May 2021, the Draft Region of Peel 2051 Land Needs Assessment Report, draft Regional Official Plan Amendment (ROPA) policies, and the criteria established in A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) for evaluating employment land conversions.

Description of the Subject Property and Policy Context

The subject property is located on the north side of Dundas Street East, with Universal Drive to the west and Southcreek Road to the east, in the City of Mississauga (Figure 1). The subject property is approximately 2.66 hectares (6.58 acres) in size and has approximately 207.33 metres of frontage on Dundas Street East. The site is currently occupied by several mixed use plazas including easting establishments, retail stores, offices, and healthcare services and is surrounded by commercial and employments uses. The Etobicoke Creek is also in close proximity to this mixed use area where the site is located.



Figure 1: Aerial Photo

The Region of Peel Official Plan (ROP) identifies the subject property within the *Urban Area* according to Schedule D (Urban Structure). The in-force ROP does not provide mapping for employment designations, however, the Region has released draft Official Plan Amendment Policies and Mapping that identifies Draft *Employment Areas* across the region. Draft Schedule Y6 (Employment Areas) of the proposed Regional Official Plan Amendment identifies the subject property as a *Draft Employment Area*, at the edge of the boundary.

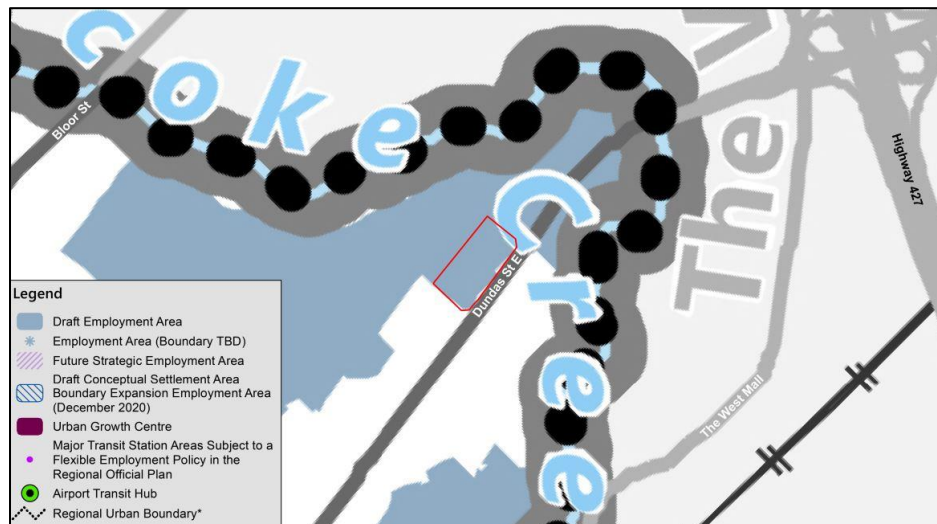


Figure 2: Draft Schedule Y6 (Employment Areas)

The subject property is designated *Mixed Use* according to Schedule 10 (Land Use) (Figure 3) of the Mississauga Official Plan (MOP) and is located within the *Dixie Employment Area* according to Schedule 9 (Character Areas). Residential uses are not permitted in the *Dixie Employment Area*. The *Mixed Use* designation of the property and its location within the *Dixie Employment Area* allow the property to be used for both commercial and employment uses.

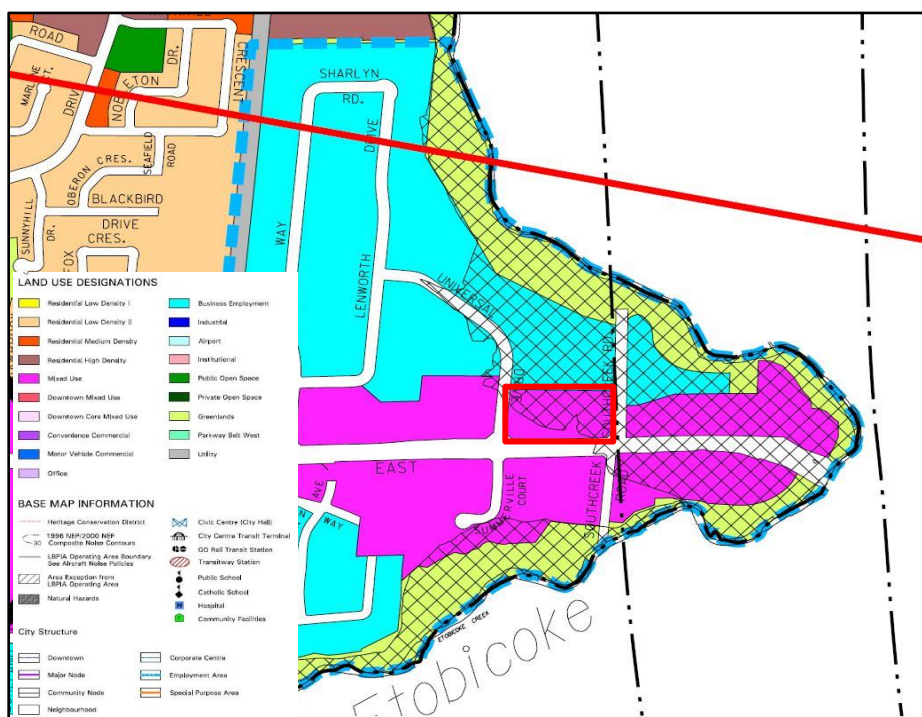


Figure 3: Schedule 10 - Land Use

The subject property is located within special policy Site 1 of the *Dixie Employment Area* (Figure 4) and is adjacent to an area that is defined as “the primary gateway into Mississauga”, identified as Area A in Figure 4. Development on lands within Area A should promote a distinctive built form and serve as a visual landmark to identify the entrance to the city. In accordance with Policy 17.4.4.1.2, commercial and industrial uses with outdoor storage are not permitted. The subject property is located adjacent to Area A and represents a natural extension of the primary gateway into Mississauga. The policies of Area A prohibit outdoor storage for commercial and industrial uses which is characteristic of traditional employment uses. There is an opportunity to extend these policies to the subject property and promote similar type of development pattern and use. Permission for commercial and office, rather than warehousing and manufacturing, on the subject property is consistent with the primary gateway policies. It should be noted that Site 1 Policies also deal with natural hazard due to the location of the Etobicoke Creek, however, approximately 1.0 acres of the subject property are outside the limits of the natural hazard area identified on Site 1. In addition, the Toronto Region Conservation Authority (TRCA) is reviewing the extent and impact of the natural hazard area pertaining to Site 1 Policies and initial results indicate that residential uses can

be accommodated. These policies will be reviewed and addressed in greater detail through a formal development application.

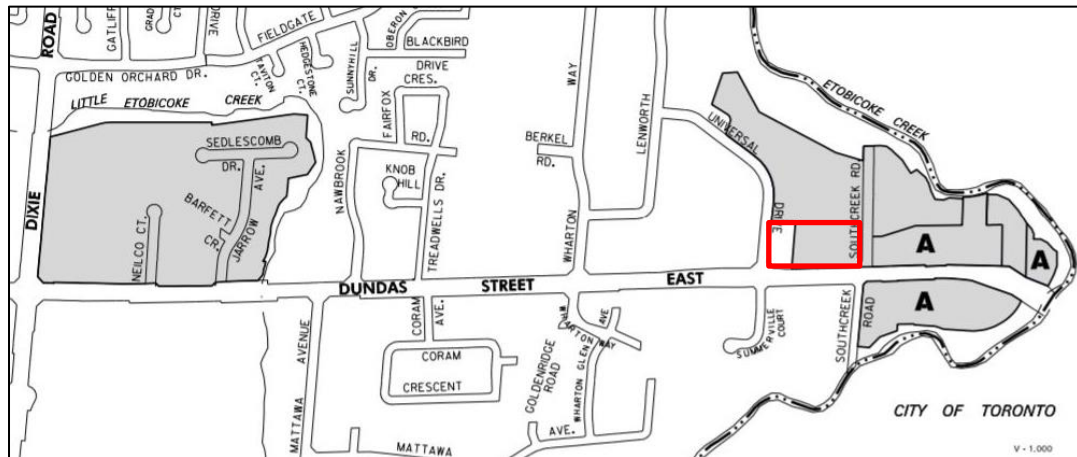


Figure 4: Special Policy Site 1: Dixie Employment Area

The City of Mississauga Zoning By-law 0225-2007 zones the subject lands *General Commercial (C3-65)*, which permits a retail store, restaurant, commercial school, and office use.

Policy Context

Provincial Policy Statement 2020

The Provincial Policy Statement (PPS) came into effect on May 1, 2020, and provides policy direction on matters of provincial interest related to land use planning and development across the province. One of the primary objectives of the PPS is to plan for and protect employment areas to secure jobs, promote economic development and competitiveness, and achieve long-term prosperity and social well-being. All planning decisions in Ontario must be consistent with the PPS.

The PPS defines employment areas as “those areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities.” The purpose of this employment conversion request is to maintain the existing permissions for commercial and employment uses on the subject property, which supports the economic development policies outlined in the PPS, and to introduce a residential use component as part of the mixed use composition.

The subject property is located in an area of the city characterized by commercial, retail and restaurant uses. Policy 1.3.2.2 of the PPS directs planning authorities to:

“...assess employment areas identified in local official plans to ensure that this designation is appropriate to the planned function of the employment area.

Employment areas planned for industrial and manufacturing uses shall provide for separation or mitigation from sensitive land uses to maintain the long-term operational and economic viability of the planned uses and function of these areas.”

The intent of Policy 1.3.2.2 is to ensure separation of industrial and manufacturing facilities from sensitive uses to maintain the long-term viability of employment uses. The subject property is located within an existing mixed use designation within the *Dixie Employment Area* which permits both commercial and employment uses. The immediate surrounding area is comprised of a mix of mostly commercial uses and the property is not in close proximity to any heavy industrial uses, such as those with open outdoor storage. The subject property does maintain a degree of separation from the industrial activities existing within the larger area, meeting the intent of Policy 1.3.2.2.

The PPS permits the conversion of lands within employment areas to non-employment uses through a comprehensive review subject to specific criteria. In accordance with Policy 1.3.2.4, planning authorities must demonstrate that the land is not required for employment purposes over the long term and there is a need for the conversion. The subject property is already not being used for traditional employment uses such as warehousing and manufacturing and this request does not intend to remove any of the property’s existing commercial and employment use permissions. The objective of this conversion request is to expand the permissions for the subject property to allow for residential uses as a component of a mixed use development for the site

Furthermore, the Region of Peel 2051 Draft Land Needs Assessment Report, which was presented to the Peel Region Planning and Growth Management Committee on September 2, 2021, finds that employment in Peel over the next 30 years is expected to be supported by more urban forms of job growth, with Mississauga and Brampton continuing to intensify existing employment areas and shift focus to jobs that “can be accommodated in more compact mixed use contexts such as Major Office and Population-Related Employment jobs.”¹ The introduction of residential uses on the subject property will support this type of development, which is identified as a policy priority of the PPS and supports the way in which employment is changing across the Region and within the City of Mississauga.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019

The Growth Plan provides direction related to the development and growth of communities within the Greater Golden Horseshoe (GGH). Section 2.2.5 of the Growth Plan identifies policies related to employment and specifies that employment land conversions can only be

¹ Region of Peel 2051 Land Needs Assessment Report, Page 70

considered at the time of an MCR (Section 2.2.5.9), though Section 2.2.5.10 does allow for conversions to be considered outside of an MCR, subject to further specific criteria. The request to develop the subject property for non-employment uses is provided as part of the ongoing Regional MCR and is considered appropriate within the context of Section 2.2.5 of the Growth Plan.

Section 2.2.5.9 provides the minimum criteria for assessing requests for the conversion of employment lands. This Section directs that:

The conversion of lands within employment areas or prime employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that:

- a) there is a need for the conversion;*
- b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;*
- c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;*
- d) the proposed uses would not adversely affect the overall viability of the employment area or prime employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and*
- e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.*

The Land Needs Assessment Report states that an additional 272,000 dwelling units will be required in the Region to meet the population growth. The proposed employment conversion, if granted, would provide residential density on the subject property and maintain the existing commercial and office uses as part of any future mixed use development thereby demonstrating a need for the conversion in accordance with Policy 2.2.5.9(a). Furthermore, Policy 2.2.5.9(b) and (c) are satisfied as the existing *Mixed Use* designation will ensure that forecasted employment growth can still be met as existing employment permissions and uses, such as office, are not being removed from the subject property. It should be also noted that the subject property is not located within a Provincially Significant Employment Zone (PSEZ). The employment conversion request will not adversely affect the viability of the employment area as it does not seek to remove the property's existing employment use permissions and the property is already used largely for commercial uses. The continued use of the property for non-employment uses and the inclusion of residential uses would also support the existing commercial and retail uses in the surrounding area. Finally, Dundas Street is identified as an *Intensification Corridor* and *Higher Order Transit* according to Schedule 6 (Long Term Transit Network) of the MOP. Based on this analysis, the requested employment conversion satisfies the criteria of Policy 2.2.5.9(a-e).

Amendment 1 to the Growth Plan introduced 31 Provincially Significant Employment Zones (PSEZ) that identify areas of high economic output and are strategically located to provide stable, reliable employment across the region. The subject property is not located within any of these 31 PSEZ.

Summary

Provincial policy contained in the Provincial Policy Statement (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe provide direction to protect and enhance employment areas in Ontario to promote job growth, protect industrial and manufacturing facilities, and encourage long-term economic prosperity across the province. The intent of these policies is to ensure the province has enough land available to meet projected employment growth. At the same time, the PPS and Growth Plan allow for the conversion of employment areas to permit non-employment uses provided certain criteria are met. This includes protecting major facilities and ensuring that Municipalities can still meet the employment growth projections.

Taken together, the policies represent a balance of consideration with respect to economic job growth and population growth. The request for an employment conversion further represents this balance of consideration by maintaining the site's existing employment use permissions and allowing for the continued mixed use commercial and office function of the site, with a request to include residential uses that will support the employment uses. The existing, stand-alone commercial uses support economic development, even though commercial uses are not a traditional employment use such as office, warehousing or manufacturing. Based on this analysis, it is our opinion that the request for an employment conversion is consistent with the PPS and conforms to the Growth Plan.

Regional Policy

Peel Region Official Plan

The in-force ROP does not provide mapping for employment designations, however Policy 5.6.2.6 outlines the employment areas that are to be protected and supported across the Region. In Mississauga, this includes lands designated *Mixed Use* and lands within the *Dixie Employment Area*. In accordance with Policy 5.6.2.8, the conversion of lands within these employment areas to non-employment uses are only permitted through an MCR and must demonstrate:

- i. There is a need for conversion;*
- ii. The Region and area municipality will continue to meet the employment forecasts of this Plan;*
- iii. The conversion does not affect the overall viability of the employment area and the achievement of intensification and density targets;*

- iv. *There is existing or planned infrastructure to accommodate the proposed conversion;*
- v. *The lands are not required over the long-term for employment purposes;*
- vi. *The lands do not fulfill the criteria for provincially significant employment lands;*
- vii. *The lands do not affect the operations or viability of existing or permitted employment uses on nearby lands; and*
- viii. *Cross jurisdiction issues have been considered.*

The criteria for an employment conversion outlined in Policy 5.6.2.8 of the ROP build on the criteria outlined in 2.2.5.9 of the Growth Plan and expand the list of criteria. Policy 5.6.2.8(i) to (iii) have been discussed in the above section related to the Growth Plan and are satisfied as the conversion request does not seek to remove the existing employment permissions contained within the *Mixed Use* designation. In addition, the subject property is not located within a PSEZ in accordance with Policy 5.6.2.8(vi) and do not affect the operations or viability of existing employment uses on nearby lands in accordance with Policy 5.6.2.8(vii). The development context east of the Mississauga border is mixed use and comprised of commercial, retail and low-rise residential land uses. As such, there is no cross jurisdictional issues with this employment request in accordance with Policy 5.6.2.8(vii). The request for employment conversion satisfies the criteria of the ROP.

Peel Region 2051+ Municipal Comprehensive Review

Peel 2051+ is being undertaken as a Municipal Comprehensive Review (MCR) to ensure conformity to provincial plans, policies and legislation, and to address emerging planning issues affecting the Region of Peel. The Region has prepared a Draft Land Needs Assessment (LNA) report to determine the amount of land required to accommodate future population and employment growth to the year 2051 in accordance with Growth Plan requirements.

On August 28, 2020, the Minister of Municipal Affairs approved an updated LNA Methodology to ensure there is sufficient land available within municipalities to meet forecasted growth in Schedule 3 of the Growth Plan 2019, including growth in housing and employment. According to Schedule 3 of the Growth Plan, the Region of Peel is forecasted to accommodate an additional 700,000 people and 335,000 jobs between 2021 and 2051. Approximately 272,000 new dwelling units will be required to support forecasted growth in Peel².

The LNA Report finds the Region of Peel is approaching build-out of its remaining designated greenfield area (DGA) lands and growth within the existing settlement areas will require the build out of the remaining DGA lands in the City of Mississauga and the City of Brampton to accommodate forecasted growth. According to the Report, “the communities of Brampton and Mississauga will not have the supply of land available in previous decades to accommodate

² Region of Peel 2051 Draft Land Needs Assessment Report, Page 46

low density units”³ suggesting that high density development within the built boundary will play an important role in accommodating future growth.

The historical pattern of housing growth in the Region has been single- and semi-detached units that has been driven by market preference and availability of land supply. According to the Report, the municipalities of Mississauga and Brampton, which represent 95% of the total population of Peel, have begun to move towards a development framework that is centred on “compact, transit supportive patterns of growth.”⁴ This pattern of high-density growth supports the objectives of the PPS and the Growth Plan. The number of dwellings required to support forecasts growth, coupled with the lack of available DGA, results in a situation where high-density development will be required to support future job and population growth. The request for conversion of the subject property presents an opportunity to meet this objective and contribute to future demand for high-density development by supporting non-employment uses on the site, including residential uses, and support future employment growth that is shifting towards urban forms of job growth.

The LNA Report describes a shift in employment opportunities across the Greater Toronto and Hamilton Area (GTHA) in terms of how people choose to work and the location of job opportunities. A greater proportion of jobs in Peel “will be captured in the service-knowledge based sectors and the demand for industrial space to accommodate warehousing will continue in areas with locational advantages to transportation infrastructure.”⁵ Employment in Peel over the next 30 years is expected to be supported by urban forms of job growth, with Mississauga and Brampton continuing to intensify existing employment areas and shift focus to jobs that “can be accommodated in more compact mixed use contexts such as Major Office and Population-Related Employment jobs.”⁶ Furthermore, the Peel economy is shifting from “goods production” to “goods movement” that is characterized by greater warehouses and distribution centres and fewer manufacturing plants. While employment land employment uses are still expected to play a major role in Peel, its share of the total employment growth is expected to be lower than historical levels⁷. The Town of Caledon is the only municipality in Peel that will be able to accommodate growth in employment land employment on newly designated greenfield lands.

As employment in Peel Region and the City of Mississauga shifts towards more urban forms of employment focused around warehouses, distribution centres, and services, the need for compact, mixed use communities will become more pertinent to support this type of growth. Employment area land can be accommodated in the Town of Caledon which is currently seeking to expand its urban boundary to add additional employment land. The location of the

³ Region of Peel 2051 Draft Land Needs Assessment Report, Page 41

⁴ Region of Peel 2051 Draft Land Needs Assessment Report, Page 42

⁵ Region of Peel 2051 Draft Land Needs Assessment Report, Page 42

⁶ Region of Peel 2051 Draft Land Needs Assessment Report, Page 70

⁷ Region of Peel 2051 Draft Land Needs Assessment Report, Page 71

Subject Property within a *Mixed Use* designation and with convenient access to transit facilities will support the employment shift.

Peel Region Employment Area Conversion Policies/Draft ROPA Policies

The Region has proposed draft ROPA policies and mapping to permit non-employment uses in Employment Areas. According to Draft Schedule Y6 (Employment Areas) (Figure 2 above), the subject property is located at the edge of a proposed Employment Area. Draft ROPA policies permit additional non-employment uses in select areas, particularly in areas facing transition and development in the future. In these areas, the underlying employment designation will be maintained in the ROPA and policies to permit additional non-employment uses are added. The request for an employment conversion seeks to maintain the existing *Mixed Use* designation and add a residential use permission to the subject property. The subject property is within a Primary MTSA (Dun-17 Dundas BRT) according to Draft Schedule Y7 (Major Transit Station Areas).

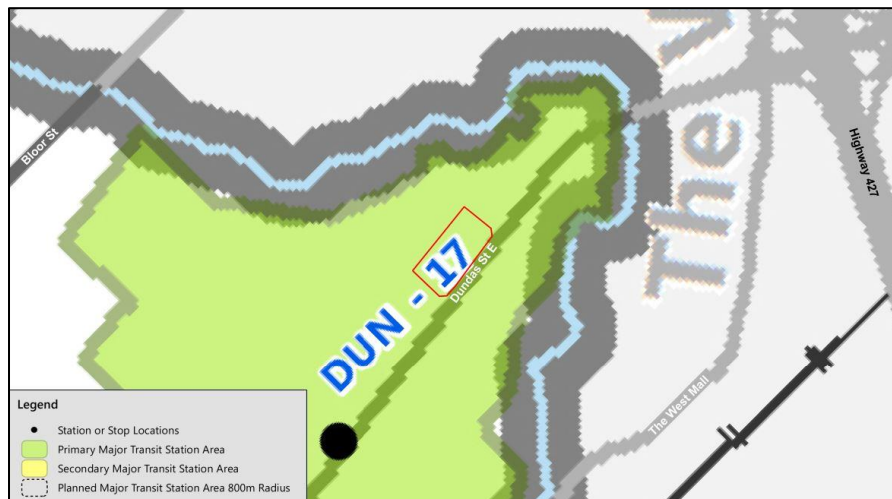


Figure 5: Draft Schedule Y7 (Major Transit Station Areas)

Draft Policy 5.6.19.6 defines a Primary MTSA as areas that have “existing or planned transit supportive built forms and can meet or exceed transit supportive density targets.” According to Table 5 of the draft ROPA, the minimum density target for Dun-17 is 160 people and jobs per hectare. The Primary MTSA designation suggests the long-term vision for the area is transitioning towards mixed use.

In accordance with Draft Policy 5.8.31, local municipalities can accommodate new retail and commercial uses in *Employment Areas* by designating lands *Business Corridor* in Brampton or *Mixed Use* in Mississauga, subject to a municipally initiated study and local official plan policies to the satisfaction of the Region that demonstrate the following:

- a) *The lands to be redesignated are located on the periphery of an Employment Areas;*

- b) The building(s) have direct frontage onto a corridor that is supported by existing or planned higher order transit;*
- c) The proposed uses are accommodated in a multi-storey mixed use office building;*
- d) Appropriate transition and buffering are provided to sensitive uses;*
- e) The planned function and viability of the Employment Area including movement of goods are not adversely impacted; and*
- f) The development exceeds the minimum Employment Area density for the local municipality prescribed in Section 5.8.26.*

The subject property meets this policy criteria in that it is designated *Mixed Use* in the MOP and has permission for non-employment uses. The purpose of conversion request is not to remove the existing employment use permissions, rather it is to add a residential use component that will support the commercial and office component of a mixed use development. This supports the City's shift towards more urban forms of employment and the need for compact, mixed use communities and will enhance the area as a gateway to the City as contemplated in the MOP.

Conclusion

This correspondence is being submitted to request that the subject property be considered for an employment area conversion to allow for residential uses in addition to the commercial uses already permitted. It is our opinion that this letter demonstrates that the proposed request satisfies policies of the PPS and the criteria outlined in the Growth Plan and draft ROPA policies.

We kindly request to be notified of any future reports and meetings and will continue to monitor the MCR process as well. Thank you for the opportunity to provide this letter and we would be open to future discussions regarding the development of the subject property should there be any opportunities for this.

We reserve the right to provide additional comments throughout this process. Should you have any questions, please contact the undersigned (ext. 241) or Jenna Thibault (ext. 309).

Yours truly,

Weston Consulting

Per:

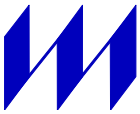


Ryan Guetter, BES, MCIP, RPP
Executive Vice President



Jenna Thibault, BSc, MPL, RCIP, RPP
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c. James Bujak, Executive Vice President, Sorbara Group of Companies



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November 30, 2021
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Attn: Tara Buonpensiero, Manager, Policy Development

Dear Madame,

**RE: Regional Municipal Comprehensive Review (MCR)
Employment Conversion Request Submission
2025-2087 Dundas Street East, City of Mississauga**

Weston Consulting is the Planner for the owner of lands located at 2025-2087 Dundas Street East in the City of Mississauga (herein referred to as the “subject property”). On November 19, 2021, Weston Consulting submitted an Employment Conversion Request letter for the subject property to be considered as part of the Region’s ongoing Municipal Comprehensive Review (MCR) process. On November 22, 2021, a meeting was held with Regional Staff to discuss the subject property and employment conversion request and, on November 23, another, similar meeting was held with Staff from the City of Mississauga.

This letter is an addendum to the previously submitted letter and is intended to provide Staff with supplementary information based on the outcome of the two meetings held with Staff.

Dundas Connects

On June 18, 2018, City of Mississauga Council endorsed the Dundas Connects Master Plan (the “Master Plan”) to guide future growth and intensification along the Dundas Street Corridor, a 19.5-kilometre corridor that stretches from Mississauga’s border with Oakville to the City of Toronto’s Kipling Station. The Corridor contains 20 character areas that are identified in the Mississauga Official Plan (MOP) including the *Dixie Employment Area*, which is the catchment area for the subject property.

Within the Master Plan, the subject property is located within the *Etoibicoke Creek Focus Area* (Figure 1). This area is also identified as Site 1 in the *Dixie Employment Area* and is subject to special site policies in accordance with Section 17.4.4 of the MOP, as discussed in our original letter dated November 19, 2021.

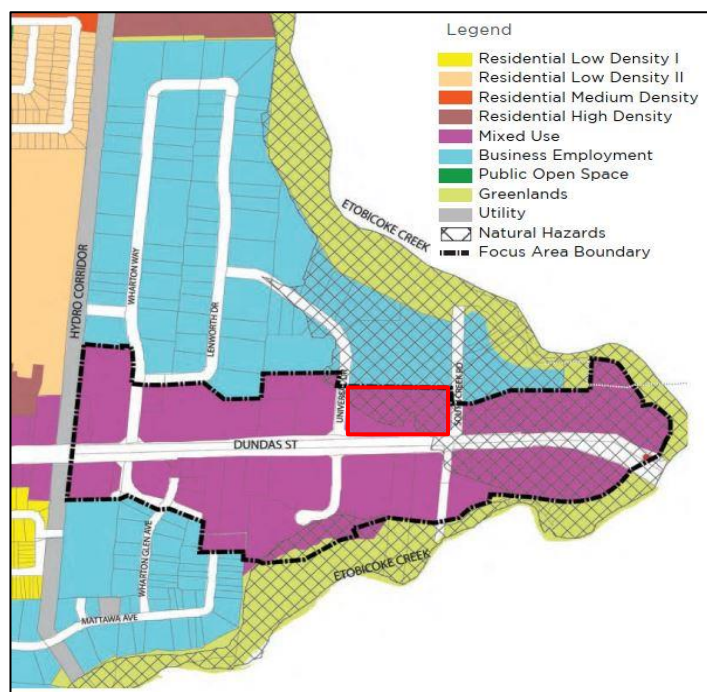


Figure 1: Etobicoke Creek Focus Area

The recommendations of the Master Plan provide for mixed use, transit supportive intensification across the Dundas Corridor and the implementation of Bus Rapid Transit (BRT) along Dundas Street. Employment Areas along the Dundas Corridor have been identified as being suited to mixed use development. Section 5.1.1 of the Master Plans states, “*within existing Employment Areas, the conversion of lands that are suitable for residential uses or other non-employment uses should be considered. Lands within Major Transit Station areas should be redeveloped to appropriate densities. Such redevelopment should allow for appropriate and gradual transition in scale to lower density development on adjacent residential and employment land.*” Specific recommendations for the Etobicoke Creek Area are contained in section 5.1.2.1 of the Master Plan and encourage mixed use development.

As outlined in our original letter, the request for an Employment Conversion on the subject property seeks to add residential use permissions while maintaining the site’s existing employment use permission. The subject property is already designated *Mixed Use* in the MOP and the recommendations of the Master Plan reinforce the *Mixed Use* designation and policies of the MOP. Furthermore, the Master Plan recognizes the need for the conversion of employment lands along the Dundas Corridor in order to achieve compact, transit-supportive growth. It is our opinion that the Employment Conversion request conforms to the Master Plan policies.

Special Policy Area

The area west of Etobicoke Creek at Dundas Street East is part of the Etobicoke Creek Special Policy Area (SPA) and is within the Regional Storm floodplain. This area is identified as special Policy Site 1 within the *Dixie Employment Area* and was discussed in our original letter. Lands within the *Etobicoke Creek Focus Area* that fall within Special Policy Area are associated with overland flooding risks. However, the Master Plan recommends updating the Etobicoke Creek SPA in order to support future mixed use development. We understand that the Toronto Region Conservation Authority (TRCA) is reviewing the extent and impact of the natural hazard area and that initial results indicate that residential uses can be accommodated. The landowner has been working closely with the TRCA and has also undertaken their own flood analysis and review of the natural hazard area. We intend to keep Regional and City Staff apprised of the work which is being undertaken, which supports the proposition of amending the SPA policies to not limit the potential of residential use permissions for the subject property.

Through discussions with Staff, it was acknowledged that the subject property has unique characteristics that warrant permission for residential uses despite the policies of the *Etobicoke Creek Focus Area*. Staff acknowledged that the subject property is located within a Primary Major Transit Station Area (MTSA) and must consider the minimum density target of 160 residents and jobs combined per hectare in accordance with Policy 2.2.4.3(b) of the Growth Plan. Staff also recommended preparing a concept plan to estimate the potential number of residents and jobs for the subject property. We reserve the right to submit a concept plan, at a later date, as part of this employment conversion request being submitted through the Region's MCR process.

Thank you for the opportunity to provide this addendum to our original letter dated November 19, 2021. We reserve the right to provide additional comments throughout this process. Should you have any questions, please contact the undersigned (ext. 241) or Jenna Thibault (ext. 309).

Yours truly,

Weston Consulting

Per:



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