

April 11, 2022

Chair Iannicca and Members of Council
Region of Peel
10 Peel Centre Drive
Brampton, ON
L6T 4B9

Dear Chair Iannicca and Members of Peel Council

Re: Requests for Employment Conversion for 3155 Argentia Road, 1100 Burnhamthorpe Road West, and 780 Burnhamthorpe Road West, City of Mississauga

We are representing SmartCentres REIT with regard to three large and strategically positioned properties located within the City of Mississauga, including 3155 Argentia Road (SmartCentres Meadowvale), 1100 Burnhamthorpe Road West, and 780 Burnhamthorpe Road West (collectively, the "Subject lands"). These landholdings have an area of approximately 22 hectares (54 acres).

We provided a delegation to the April 7th Planning and Growth Management Committee meeting regarding our requests for employment conversions to enable further master planning for a full range of land uses, including office, retail, residential, open space, and community uses on the Subject lands. The Planning and Growth Management Committee requested that Regional staff reconsider our requests for employment conversions and report back to Council at its April 14th meeting. This letter provides a summary of the planning rationale for employment conversions, which was provided in full by way of formal conversion requests submitted to Regional Staff on November 12th and 22nd, 2021. ***We request that Council, with consideration of the planning rationale for the Subject lands, grant the conversion requests and remove the Subject lands from Schedule E-4 of the proposed New Region of Peel Official Plan.***

The Subject lands

SmartCentres Meadowvale is a 12.6 ha (31.1 acres) large-format retail centre, located at Argentia Road and Tenth Line West. The site is within the Lisgar GO (MIL - 1) Planned MTSA and Winston Churchill (407 - 3) Planned MTSA. SmartCentres Meadowvale is immediately adjacent to the existing Lisgar GO station on the Milton GO corridor, and the future Winston Churchill BRT station on the planned 407 Transitway.

1100 Burnhamthorpe is a 4.6 ha (11.4 acre) main street retail strip mall, at Burnhamthorpe Road West and Central Parkway West. The site is within the Erindale GO (MIL - 4) Planned MTSA, and within very close proximity to the Erindale GO station (250 metres).

780 Burnhamthorpe is a 4.4 ha (10.9 acre) main street retail strip mall, located at Burnhamthorpe Road West and Mavis Road. The site is strategically positioned on an urbanizing arterial road that

REFERRAL TO _____
RECOMMENDED _____
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED _____

connects two Strategic Growth Areas; it is 450 metres (a 5-minute walk) from Mississauga’s Urban Growth Centre, and 1500 metres (a 5-minute bus ride) from Erindale GO station.

The Subject lands are underutilized

The current organization of uses on the Subject lands is inefficient and auto oriented, and the retail and commercial uses are under performing, feature a relatively low number of jobs, and represent an underutilization of land given the Subject lands’ relationship to the Region’s proposed Strategic Growth Areas, the City of Mississauga’s Urban System, and proximity to existing and planned higher order transit infrastructure.

	Existing Jobs	Area of Vacant Retail Units (% of total)	Percentage of site occupied by surface parking
3155 Argentia Road (12.6 ha)	663	16,732 m ² (26%)	77%
1100 Burnhamthorpe Road West (4.6 ha)	285	2,863 m ² (20%)	66%
780 Burnhamthorpe Road West (4.4 ha)	380	811 m ² (5%)	60%

The proposed New Region of Peel Official Plan retains these lands for employment uses – this will lead to a decline in the number of jobs provided on the Subject lands

While the retail uses that exist on the Subject lands today play a role in serving the local population, there has been an overall contraction in the retail market across North America over the last decade that has seen a reduction in retail demand for brick and mortar space. This trend, as noted in the Region of Peel 2051 Land Needs Assessment report (LNA), has been hastened by the COVID-19 Pandemic and has had an effect on the Subject lands, with all three sites experiencing growing retail vacancies and a resulting loss of retail jobs.

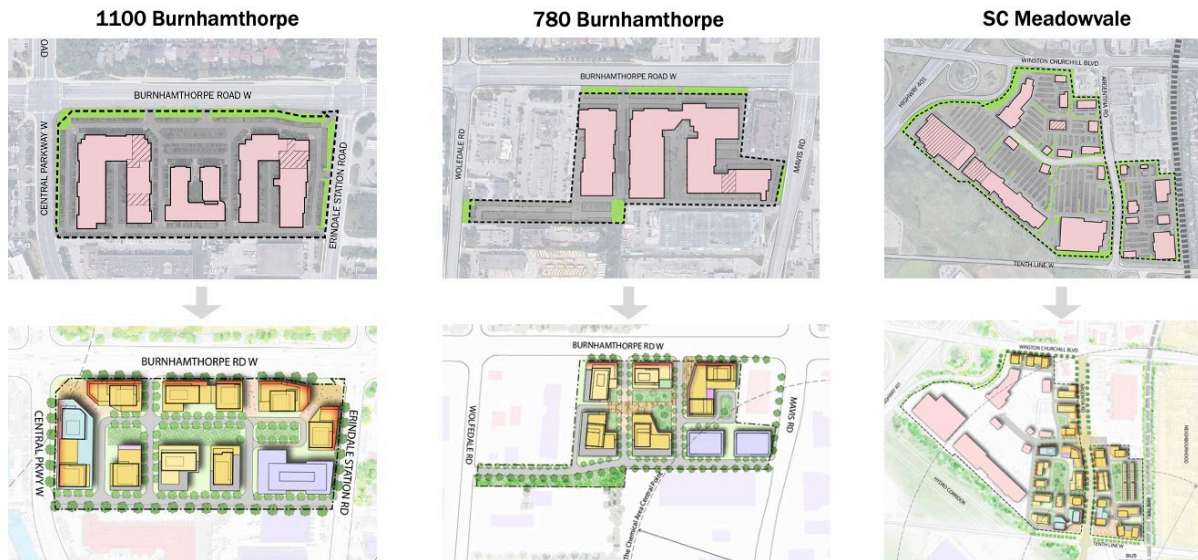
The Subject lands and surrounding context are not currently conducive to redevelopment with office uses. The Region of Peel LNA notes that there has been a shift of office development from suburban locations to more urban locations over the last several decades. The LNA further notes that suburban locations must offer an urban environment to be competitive for Major Office employment, with urban, mixed-use nodes likely to emerge as a location preference for office development.

Maintaining the Subject lands for employment purposes may lead to a decline in the number of jobs provided. There are a number of contextual considerations that make redevelopment of the Subject lands with Employment Land Employment (ELE), such as manufacturing, warehousing and logistics uses unlikely. Even if the Subject land were redeveloped with ELE uses, such uses would likely lead to fewer jobs than are provided today given the low and decreasing employment densities of these uses as a result of the continuing advancement of automation and efficiency (as noted in the Region of Peel LNA and Employment Strategy Discussion Paper 2051 Addendum).

Maintaining the Subject lands with their current retail uses may also lead to a decline in the number of jobs provided. The current vacancies are not only indicative of the broader overall contraction in the retail market, but also may lead to an increasing number of vacancies on the Subject lands as their vitality as retail destinations is compromised. As vacancies proliferate, retail centres become less attractive to customers who seek out retail centres where they can access a fuller range of commercial services. This can lead to a vicious cycle that ultimately may leave the Subject lands entirely vacant.

The Subject Lands have tremendous potential for mixed-use intensification

IBI Group has prepared preliminary development concepts for the Subject lands that demonstrate the potential for transit-oriented intensification. The preliminary development concepts consider a broad mix of uses to support a transit-oriented complete community including residential uses, replacement of the retail space that exists on the site today, the introduction of office uses and other employment uses. To support existing and future residents, community-oriented uses and generous open spaces are integrated throughout the preliminary development concepts. Residential uses are proposed with a range of housing types and tenures, including grade related units, multi-unit residential and affordable housing options. As several members of the Planning and Growth Management Committee notes, the preliminary development concepts represent the leading edge of contemporary city building, transitioning single-use sites to thriving, mixed-use urban districts.



In summary, the preliminary development concepts achieve the following:

- Accommodate an **increase the number and diversity of jobs** (retail, office)
- Incorporate **market and affordable housing** to accommodate Region's growth targets
- Incorporate **open spaces and community amenities** to support the livability of communities
- Introduces appropriate **intensification near transit**
- Promotes a **compact form of development** (sustainable, reduces reliance on cars)

Preliminary Development Concepts demonstrating Mixed-Use Intensification of the Subject lands



1100 Burnhamthorpe



780 Burnhamthorpe



SmartCentres Meadowvale

The redesignation of the Subject lands is appropriate and represents good planning

Urban Strategies submitted conversion requests for the Subject lands to Region of Peel Planning staff on November 12th and 22nd, 2021. The planning rationale reports included in these submissions included an analysis of the Subject lands relative to the Region's criteria for considering employment land conversions, as informed by the Provincial Policy Statement, Growth Plan for the Greater Golden Horseshoe, in-force Regional Official Plan, Draft Regional Official Plan, and in-force City of Mississauga Official Plan. We are of the opinion that conversion of the Subject lands to permit a fuller range of uses, including residential, is appropriate and desirable and represents good planning.

Furthermore, conversion of the Subject lands will enable higher-density mixed-use development that will implement the policies of the proposed New Region of Peel Official Plan, particularly policies on growth management, intensification, transportation, housing and climate change.

Redevelopment of the Subject lands with a broad mix of uses, including office and retail uses, will contribute to a significant increase in the total number of jobs provided on-site. It will also make the surrounding employment area more attractive and vibrant. Redevelopment of the Subject lands with a higher density mix of uses can help spur redevelopment of adjacent lands with higher density employment uses, including office.

Mixed-use intensification of the Subject lands will contribute to achieving the Region's growth and intensification targets, which are predicated on a significant shift towards medium and high density housing types and Transit-Oriented Development.

Permitting higher density residential uses on the Subject lands will contribute to a fuller range and mix of housing options and a more complete community. The provision of a full range and mix of housing options cannot be provided in the existing residential areas proximate to the Subject lands as they are predominated by single and semi-detached housing and feature limited opportunities for intensification.


Redevelopment of the Subject lands from low density, single use and an auto-oriented form to higher density, mixed-use and a pedestrian-oriented form will contribute to climate change mitigation. It will contribute to a mode shift away from private automobiles and towards active transportation and transit, reducing greenhouse gas emissions.

We respectfully request that the employment conversions and redesignation of the Subject lands be reconsidered

The Subject lands are within Employment Areas as identified on proposed Schedule E-4, dated April 2022. On this same schedule, the Subject lands are not identified as falling within a Major Transit Station Area subject to Flexible Employment Policy in the proposed New Region of Peel Official Plan. Residential uses are currently prohibited on the Subject lands and their inclusion within Employment Areas on proposed Schedule E-4 has the effect of maintaining this prohibition. ***We are requesting that permission for a full range of uses, including residential, be considered for the Subject lands*** to enable further master planning of the Subject lands to achieve the vision for higher-density, mixed-use, transit-supportive development.

Thank you for your further consideration of this matter.

Yours very truly,
URBAN STRATEGIES INC.



Christine Fang-Denissov, MCIP, RPP, MRAIC
Partner

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Mauro Russo, Development Manager, SmartCentres REIT