
PLANNING JUSTIFICATION REPORT - ADDENDUM

IN SUPPORT OF AN
OFFICIAL PLAN AMENDMENT AND ZONING BY-LAW
AMENDMENT

CRW 1 LP and CRW 2 LP
2105, 2087, 2097, 2077 Royal Windsor Drive
City of Mississauga
Region of Peel

October 2024
GSAI File #1315-002





1.0 INTRODUCTION

Glen Schnarr & Associates Inc. (GSAI) has been retained by CRW 2 L.P.; CRW 2 GP INC to assist in obtaining the necessary planning approvals to allow for the redevelopment of the site municipally addressed as 2105, 2087, 2097, 2207 Royal Windsor Drive, located in the City of Mississauga (herein referred to as the “subject lands”, “the site”). The subject lands are generally located on the north side of Royal Windsor Drive, west of Southdown Road, situated south of the Clarkson GO Station.

To date, on behalf of our Clients, GSAI has made a formal submission for Official Plan and Zoning By-law Amendment applications on December 15, 2022. Since that time, staff and review agencies have formally issued comments on the application(s). The purpose of this Planning Justification Report Addendum (the “Addendum”) is to respond to the first round of comments on the Planning Justification Report, specifically those issued by the Region of Peel (Planning) staff and City of Mississauga (Planning) staff. These responses are set out in Section 3.0 of this Addendum.

In direct response to comments from staff, the development concept has changed since the original submission. Generally, these revisions include; removal of the north-south vehicular “woonerf” condition centralized to the interior of the buildings, maintaining the existing access point from Royal Windsor Drive to facilitate continued access rights (as per an existing easement agreement) enjoyed by the existing plaza to the east, increases in tower heights and reduction of podium heights, introduction of a public park block, and relocation of retail/non-residential uses.

This Addendum also provides additional justification, resultant of the revised concept (further described in Section 2.0 of this Addendum). This Addendum is meant to be an update to or in some instances, supplementary to, our original Planning Justification Report dated December 2022.

1.1 EXECUTIVE SUMMARY

In summary, we maintain our view that from a land use planning perspective, the proposed development is consistent with and supportive of policy directions promoting intensification of underutilized sites within built-up, strategic growth areas and continues to support the City’s urban structure and hierarchy. The proposed development supports the objective of complete communities through providing residential intensification and commercial opportunities in an area where it can be supported by existing and expected (or planned) conditions, in this instance, the Clarkson Transit Station Area Study.

The site will likely be the first to develop in the Clarkson Major Transit Station Area. As such, the entirety of the proposed parkland for the area has been assumed on the site. The proposed parkland dedication is 1,750 m², representing 11.55% of the total site area of the subject lands and 16.92% of the net site area.



The subject lands have a site area of 15,148 m², approximately 1,920 m² is dedicated to new roads, an improved transportation network (12.67% of total site area). This results in a proposed development area (net site area) of 10,132 m².

At present, there is a Metrolinx easement that bisects the site for the purpose of providing vehicular and pedestrian access to the Clarkson GO station to the north. Our client has had discussions with Metrolinx regarding a new easement agreement to relocate the access rights. The new easement would relocate the access rights to the interim private road to the west of the site. At such time that the industrial condos to the west of the subject lands are developed, and the road can be widened in full to the standards of the City, the Public Road will be conveyed to the City. The plans as presented in this resubmission are contingent on Metrolinx agreeing to a relocated access rights in a new easement agreement. If Metrolinx does not agree to a new easement agreement, the opportunity to have a substantial park on the subject lands will be significantly reduced.

Our Client has been working with staff, collaboratively, to understand the Clarkson Transit Area Study work which has culminated in a revised development concept. The new concept is described in section 2.0 of this Addendum.

2.0 PROPOSED DEVELOPMENT

The following section provides an overview of the key elements and statistics with respect to the proposed development.

2.1 Development Proposal and Design

The subject lands are approximately 1.5 ha (3.70ac) and are currently occupied by four existing 1-storey commercial buildings.

There is an existing driveway providing access from Royal Windsor Drive, encumbered by a Metrolinx easement, that bisects the lands for the purpose of providing vehicular access to the Clarkson GO station located to the north. For the purpose of this application, we have assumed that Metrolinx will ultimately be agreeable to having its access rights pursuant to the easement relocated to the west of the site along the newly proposed right-of-way, which is expected to function on an interim basis with the right of way width shown on the Development Concept Plan. This interim condition will exist until the lands to the west redevelop and the road is widened to the standards of the City's Public Roads. At that time, the new Public Road will be conveyed to the City, and the easement will cease to exist. This is the final condition. Again, our team continues to engage in discussions with Metrolinx to finalize the agreement for the relocation of the access rights under the easement.

The existing eastern property access easement is maintained in the resubmission drawings. The neighbouring owner is not supportive of a relocated access easement and therefore after several discussions, it was agreed that the easement would remain in place to ensure the local businesses are continued to be supported, and that development of the site would not be hindered. This



driveway reflects existing rights in place over the subject lands and must remain in perpetuity.

The ultimate objective of this proposal continues to be the achievement of a mixed use, transit supportive redevelopment of the subject lands that responds to Ontario's, and Mississauga's housing crisis.

The revised development concept continues to contemplate the introduction of a mixed use development consisting of 4 residential high-rise buildings situated atop podiums with a total of 1,419 residential units (including 16 live/work units).

The development is proposed in two phases, referred to as the "West Block" (Phase 1) which includes Towers 1 and 2, and the "East Block" (Phase 2) which includes Towers 3 and 4.

Within the West Block, Tower 1 is proposed at 35 storeys (incl. 7 storey podium). The floorplate size for the tower is 754 m². Tower 2 is proposed at 31 storeys; (incl. 7 storey podium). The floorplate size for the tower is 776 m². The two towers are joined by a "bridge" from floors 3 to 7, amenity space atop floor 7. The West Block (738 total units) provides the following unit breakdown: Studio (30/ 4%), 1 bedroom (243 units/ 33%), 1 Bed + Den (201 units/ 27%), 2 bedroom (185 units/ 25%), 2 Bed + Den (15 units/2%), (3 bedroom (61 units / 8%) and Live/Work (3 units/ 0%). The West Block will include a total proposed amenity space of 2,716m².

Within the East Block, Tower 3 is proposed at 35 storeys (incl. 7 storey podium). This does not include the mechanical penthouse. The floorplate size for the tower is 754 m². Tower 4 is proposed at 26 storeys. (incl. 7 storey podium) and continues with the lowest height in the project to address sun/shadow considerations for nearby existing residential uses. This does not include the mechanical penthouse. The floorplate size for the tower is 751 m². The two towers are joined by a "bridge" from floors 3 to 7, amenity space is provided atop floor 7. The East Block (681 total units) provides the following unit breakdown: Studio (30 units/ 4%), 1 bedroom (205 units/ 30%), 1 Bed + Den (187 units/ 27%), 2 bedroom (183 units/ 27%), 3 bedroom (63 units / 9%) and Live/Work (13 units/ 2%). The East Block will include a total proposed amenity space of 2,798m².

We note for staff that the reallocation of density and floorplate size(s), ultimately resulting in an increase in tower height, was informed by the results of the sun/shadow study which was completed to the City's defined terms of reference. Further, tower separation distances above 29m have been maintained as a direct response to City comments.

While the location of the buildings generally remains consistent from the original submission, the buildings have been situated to strategically allocate height and distribute density across the subject site. As previously noted, a significant portion of the site (12.67%) has been dedicated to an improved transit network, and 11.55% of the site area is proposed for a new park. The massing and distribution of buildings also considers both internal and external streetscape conditions and how buildings relate to both the public and private street realms. The site has been programmed to provide contiguous pedestrian connections throughout the site and through internal sidewalks with access to the Royal Windsor Drive right-of-way. The buildings proposed have been strategically situated to maximize available space, have regard for crime prevention through environmental design principles (CPTED), and achieve appropriate building separation distances, amongst other



best practices.

The total 5,514m² of amenity space proposed (including indoor amenity space and outdoor amenity space) has been informed by logical site and building programming and the microclimatic study findings, to provide for user comfort and effective utilization.

Retail and/or commercial uses are situated at grade and generally located along the ROW frontage at Royal Windsor Drive and along the frontage of the proposed new access road along the west with a total of 945m² retail area proposed. In addition, the location of the retail and live/work units (347 m²) is a direct response to City comments. This is further informed by street presence and optimizing utilization to provide for an active internal site where pedestrians (visitors, residents, and those looking to connect to the Clarkson GO station) can easily engage with the services/amenities and to help ensure the success of the units.

Pedestrian and vehicular access to the site continues to be provided from Royal Windsor Drive. In accordance with urban design best practices, loading, servicing and parking has been centralized inside the development block and will be screened from view. All parking for residents is proposed underground and will include 4 levels of underground parking under the West Block (and 3 under the East Block. There is limited at-grade (lay-by) parking proposed to support the non-residential uses to facilitate effective and efficient circulation and use by delivery services.

A large functional park block has been proposed which is intended to be dedicated as public parkland. This revision in shape and location of parkland from the previous plan iteration allows for an immediate and substantial public park presence with each planned phase of development. Providing this significant contribution of parkland has been done to align with the general vision for the Clarkson Transit Station Area Study and overall Official Plan work.

The total parking ratio proposed is 0.37 spaces per unit proposed to accommodate the West Block and 0.48 spaces per unit to accommodate the East Block. The technical rationale for the proposed parking is provided in the Traffic Impact Statement as prepared by LEA Group submitted as part of the Official Plan and Zoning By-law Amendment application resubmission. A vehicular parking breakdown is provided below:

- Total Proposed Parking – 567 spaces
- Residential – 528 spaces
- Visitor– 27 spaces
- Retail– 12 spaces

There is also short-term bicycle spaces provided, and long-term spaces provided for both residents and visitors. The provided bicycle parking meets the City's Class A and Class B standards. A bicycle parking breakdown is provided below:

- Total Bicycle Parking – 949
- Resident – 944
- Retail - 7

A phasing plan has been submitted in support of the application which outlines the two phases for development. Each phase will independently comply with the applicable zoning as provided for in



the proposed Zoning By-law Amendment. Phasing for this project is contemplated due to existing tenant lease terms, it is also critical to ensure continued site access to the Clarkson GO station and uninterrupted access of the Metrolinx easement, as well as staging for construction.

The proposed development continues to propose revitalization of an underutilized site within a Major Transit Station Area in proximity of a significant intersection at Royal Windsor Drive and Southdown Road, which is considered a Gateway location pursuant to the Mississauga Official Plan.

2.2 New Site Plan Application

GSAI has recently submitted a new site plan application to the City (PRE-109180). It is the intention of our client to advance their site plan application concurrently with the OPA/Rezoning application. Plans submitted in support of this application are the same drawings as have been submitted for the site plan application.

3.0 POLICY EVALUATION – SCOPED TO COMMENTS RECEIVED

The following discussion is in response to the specific policies cited by City and Regional staff as part of their comments on the formal development application.

Since the time of the first submission (December 2022), there have been advancements in the Clarkson Transit Station Area Study, and it is expected that significant progress will be made in the fourth quarter of 2024 which will culminate in a formal City Planning and Development Committee (PDC) Recommendation Report and Council decision on the Clarkson Transit Station Area Study. We expect that the remaining process associated with the Clarkson Transit Station Area Study aligns well, timing wise, with staff's review on this application and preparation of the associated City Planning and Development Committee Recommendation Report and Council meeting. Therefore, the continued, concurrent review of the two processes remains appropriate.

We maintain our opinion that this development proposal presents a logical use of land and provides a catalyst to spur redevelopment in this section of the Major Transit Station Area in a way that is rational in light of its proximity to transit infrastructure amongst other things, and in keeping with the planned intent and function of the area as well as the Clarkson Transit Station Area Study work, to date.

3.1 Region of Peel Comments

We have reviewed the most recent (April 2022) Regional Official Plan as well as the Minister's Modifications (November 2022) to inform this section of the Addendum. We have directly extracted staff comments and inserted them into this Addendum for your ease of review. Staff comments are provided in "*italics*":

The applicant provided a sworn affidavit regarding conformity to the Region of Peel Official Plan, however the Region continues to have concerns with the resolution of specific policies such as 5.8.36. Please refer to subsequent comments for more information.



Acknowledged.

The Region has reviewed the Planning Justification Report (PJR) prepared by Glen Schnarr & Associates dated December 2022 and offers the following comments.

The subject property is located in multiple key policy areas in the approved April 2022 Region of Peel Official Plan (RPOP) including a Strategic Growth Area on Schedule E-2, the Employment Area on Schedule E-4, and Clarkson GO "LWGO-2" Major Transit Station Area on Schedule E-5. While the lands within the MAJOR TRANSIT STATION AREA are generally supported for employment growth to meet the minimum overall density of 150 ppj/ha, specific land uses are to be reviewed on a site-by-site basis. This property continues to be protected for Employment Area land uses as defined by the RPOP, and the potential introduction of residential uses may only be considered through the application of RPOP policy 5.8.36, subject to the completion of a planning study initiated by a local municipality that addresses specific criteria to the satisfaction of the Region. The City of Mississauga has been advancing their Clarkson GO MAJOR TRANSIT STATION AREA Study and it is appreciated that the Air Quality Study has made significant advancements to satisfy the Region, however a number of policy criteria are still under consideration through comprehensive planning and the full Clarkson GO MAJOR TRANSIT STATION AREA Study has not been completed. Therefore, mixed residential uses cannot yet be supported. The commentary in the first paragraph of page 41 of the PJR does not fully recognize the importance of this key milestone, and policies 5.8.36 and 5.8.37 are misquoted.

We acknowledge policy 5.8.36 and 5.8.37 and note that this comment is dated considering the progress that has been made since the time of this comment in the second quarter of 2023.

Policy 5.8.36 does not preclude the advancement of a Planning Application through the approvals process in the absence of the completion of the planning study. Policy 5.8.36 also offers no specificity, in absolute terms, to suggest that the policies associated with the technical planning study must be completed, only that certain criteria are met. It is our understanding that these criteria would have to be satisfied prior to the City advancing the land use designations reflected in the Clarkson Transit Station Area Study Concept, which is nearing substantial completion alongside the Official Plan draft policies which are intended to be submitted in Q4 of this year.

It is also our understanding that the City intends to finalize the preliminary Clarkson Transit Station Area Study Concept in the coming months with no revisions to the Clarkson Transit Station Area Study Concept previously presented to the public as related to this site. It is our opinion that the City of Mississauga could not prematurely release land use plans for the Clarkson Transit Station Area Study for consultation for City Planning and Development Committee and Council consideration showing sensitive uses if it was not satisfactorily demonstrated that the use is in fact technically feasible. The City has also confirmed that residential uses are permitted on site through public meetings for both the Clarkson Transit Station Area Study and the conclusion of the Air Quality study.

Additionally, while the Region was responsible for the delineation of the boundaries of the Major



Transit Station Area(s) and prescription of more general policies, the authority surrounding land use planning designations and policies is downloaded to the area Municipalities (ie. City of Mississauga) following the removal of the Region's land use planning responsibilities. It is our understanding that it is at the discretion of the City to permit the introduction of sensitive uses, which, per their available draft mapping for the Clarkson Transit Station Area Study and as confirmed in two public meetings, solidifies the fact that sensitive uses such as residential permissions will in fact be introduced.

We are of the opinion that henceforth, while the Region may act as an advisor to the City to some degree (and may be called upon by the Province through their review of the City's Clarkson Transit Station Area Study work), the Region's policies have been reasonably satisfied as far as they can be applied and moreover that the future of the Clarkson Transit Station Area (through the Clarkson Transit Station Area Study) rests with the City of Mississauga (and the Province) and further, the Region does not play a role as a formal approval authority over the final Clarkson Transit Station Area Study work, unless called upon by the Province.

The MAJOR TRANSIT STATION AREA policies of Section 5.6.19 of the RPOP must be addressed, and the PJR has not fully considered how policy 5.6.19.18.j, which ties to 5.8.36, has not yet been satisfied. Should policy 5.8.36 be satisfied, the Region will be able to provide comments on the proposed development and PJR to ensure there is an appropriate density and mix of people and jobs (numbers should be provided in resubmissions) in line with the future Mississauga Official Plan policies to be determined through the Clarkson GO MAJOR TRANSIT STATION AREA study.

In relation to Policy 5.8.36, it seems that the City has satisfied itself that it has been reasonably satisfied. Based on the progress made since issuance of this comment by the Region, the City has advanced the Clarkson Transit Station Area Study process significantly. The City has presented twice a land use concept, and with the understanding the schedules and policies go 'hand and hand', it seems impossible to have identified land uses without the foresight to determine variables (at least generally) such as employment/population density and yields, etc. In fact, in the City's Open House presentation (November 2023), densities for employment and people were cited, which appears to have culminated in a Clarkson Transit Station Area Study concept.

For ease of reference, policy 5.6.19.10 j) reads:

5.6.19.18 Until such time as the local municipality has established Major Transit Station Area policies in accordance with Section 16(16) of the Planning Act and Policy 5.6.19.9, proposed developments within a Major Transit Station Area identified on Schedule E-5 shall be reviewed with consideration to the objectives of this Plan to ensure the proposed development:

Considers municipally initiated studies and recommendations that support the requirements of Policy 5.6.19.10

We also note that the draft land use policies are being brought forward for consideration in Q4 2024. We have no objections to the processing and review of this application, to run concurrently with that process.



Considering the RPOP policy issues described in previous comments, the Region reserves commenting on the provision of housing (mix, tenure, affordability etc.) until it is determined whether it is appropriate for the lands to change from an Employment Area to mixed residential uses.

Acknowledged.

3.2 City of Mississauga Comments

The lands are located within the Southdown Employment Character Area, the Region of Peel's Employment Area and the delineated Clarkson GO MAJOR TRANSIT STATION AREA boundaries. Residential uses are currently not permitted on the lands and within the Southdown Employment Area. As set forth under Policy 5.8.36 of the Region of Peel Official Plan, the introduction of residential uses in the Clarkson GO MAJOR TRANSIT STATION AREA is subject to the completion of a planning study initiated by the City of Mississauga. As set forth under Policy 5.8.37, the lands could be removed from the Region's Employment Area designation without an amendment subject to the completion of the planning study.

A significant amount of time has passed since this comment was issued in early 2023. Since this comment was issued by staff, a number of changes in legislation have been made with respect to Regional authority/jurisdiction and there have been advancements with the Clarkson Transit Station Area Study as well as discussions with our Client.

In the coming months, the Clarkson Transit Station Area Study will proceed to Planning and Development Committee and subsequently to Council alongside the policies to implement same. Notably, this OZA resubmission does not require Regional approval. In discussions held with City staff, it is expected that the application can run concurrently with the City's work, and the Province's review and ultimately approval (assuming one is granted) of the City's own Clarkson Transit Station Area Study work.

The air quality and/or land use compatibility assessments are complete and are a significant factor informing if sensitive land uses could be introduced within the Major Transit Station Area lands. Now, the City has located sensitive uses through the release of a Land Use Designation map through the Clarkson Transit Station Area Study work, which is expected to conclude (Q4 2024/Q1 2025). Based on the City's progress and communication, sensitive uses, such as residential will be introduced within this quadrant of the Major Transit Station Area as well as specifically on this property. If the City finds it appropriate to advance the Clarkson Transit Station Area Study while showing sensitive uses on this site (and throughout the Major Transit Station Area lands), even in the absence of formal policies, then there is no reason that the lands could not be removed from the Region's Employment Area designation at the City's discretion and further, that policies for this site could be adopted as part of the City's Clarkson Transit Station Area Study review.

City Planning Strategies' Air Quality study and Clarkson GO MAJOR TRANSIT STATION AREA study are currently in process. Please be advised that the intent of the comments provided by City



departments and agencies is to provide feedback and direction both on the site-specific applications based on existing context and on the planned context through the ongoing Clarkson GO MAJOR TRANSIT STATION AREA study. The Clarkson GO MAJOR TRANSIT STATION AREA study will set forth the comprehensive planning framework for the area including the delineation of development blocks, parkland and road network. Therefore, additional comments may be provided and existing comments may change as new information is submitted or as the Clarkson GO MAJOR TRANSIT STATION AREA study proceeds. This could involve comments regarding built form, massing, development blocks, road network and parkland.

We acknowledge this comment and appreciate the cooperation and communication this team has received from the City. There have been ongoing discussions between City representatives and the Owner in order to formulate a mutually agreeable land use concept for the purposes of the Official Plan Amendment and Zoning By-law Amendment, even since well before the first submission in December 2022. It is our understanding that at the direction of city planning staff, our client was encouraged to resubmit the OZA so that the City could respond to the application's revisions. We understand that the Clarkson Transit Station Area Study is being brought forward for Council consideration in Q4 2024 which completes the visioning exercise including compatible consideration of the proposed development application elements, subject to Provincial review and approval (anticipated February 2025). It is our understanding that the proposed concept is generally aligned with the City's vision with regards to streets, parks, uses, etc... and, for the purposes of the Official Plan Amendment and Zoning By-law Amendment is sufficiently advanced. Further refinement to the plan(s) can be detailed through the Site Plan process.

A detailed concept plan is required to indicate how the development proposal addresses the Clarkson MAJOR TRANSIT STATION AREA vision. The concept drawings are to indicate the vehicular and pedestrian access routes to and from the site, inner vehicular and pedestrian circulation within the site, building footprints, surface parking and below grade parking slab locations, public and private roads and walkways, and phasing boundaries. The concept drawings also need to show all landscape buffers & soft landscape areas, communal and private amenity spaces, and other information as requested to evaluate the compatibility of the development proposal with the Clarkson MAJOR TRANSIT STATION AREA and adjacent land uses. [cont'd...]

The Concept Plan has been developed in accordance with City comments as well as ongoing discussions with staff and our client as part of updates to the Clarkson Transit Station Area Study following the first submission of the Official Plan Amendment and Zoning By-law Amendment applications. The Concept Plan has provided further details, per staff request reflected in this comment. Further site and building details are also available in the recently submitted (PRE-109180) site development application for these lands.

[cont'd]...Additionally, revise the current proposal to provide the following:

- A) Remove the vehicular woonerf through the middle of the site in favour of a dedicated pedestrian space inclusive of at grade communal outdoor amenity area, walkways, commercial spill out areas and landscaping inclusive of trees, shrubs and soft landscape areas.*



- B) Expand the contextual information surrounding the property and indicate the pedestrian walking and cycling routes.*
- C) Revise the proposal to demonstrate outward connections to the property and all desire lines through the site. Consideration of the transit influences including Clarkson Go are to be indicated.*

Additional comments may be provided as the proposal progresses.

The woonerf (running north-south) has been removed from the site. It has been replaced with a multi-use pedestrian space and fosters better sightlines and site programming including connectivity to public spaces and right-of-ways. Direct connections from Royal Windsor to the proposed park space inform the arrangement of landscaped areas. We look forward to continuing to refine the Concept Plan and Landscape Plan through the detailed design (Site Plan) stage.

Given the proposal is within an employment area, there is no parkland provision targets currently, however given the future MAJOR TRANSIT STATION AREA, a 400m walking distance is required to a City owned playground. There are no existing City owned playgrounds within 400m to this development. This Department is recommending a public park as per requirements of Bill 23. Official Plan policy 6.3.33 states that Public parkland will be designed to allow clear sightlines, openness and visible entrances that can be achieved by maximizing street frontages, where possible. Additional requirements to be considered: (1) To be unencumbered (no underground parking, utilities, underground infrastructure); (2) Have street frontage where Parks should have a good visibility balanced with user comfort; (3) Have complimentary adjacent built form/land use (4) Have framed space/comfortable edges; (5) Do not create CPTED concerns and desirable views to, through and from the Park.

A large unencumbered parkland dedication, amounting to 16.92% of net site area of the subject lands, has been provided as part of the revised development concept. The revised size and location of the proposed public park enhances the sightlines, openness and entrances to this proposed public space. The parkland has been strategically located away from the Royal Windsor Drive frontage to provide a sense of safety and exclusivity, away from the heaviest automobile traffic, thereby promoting user comfort. As a direct response to City comments, the base (interior) of the two towers situated on the most northerly portion of the site, the team plans to provide space and programming for outdoor patios which face the future public park space. This will support the concept of Crime Prevention Through Environmental Design and create a centralized area for safe, formal and informal congregation for residents and visitors to the site. The location, sizing and consideration of street access for the newly revised park block has been significantly influenced by the ongoing Clarkson Transit Station Area Study. There is the potential for the park block and access opportunities to expand with future development north of the subject lands. We look forward to continuing to refine the Concept Plan and Landscape Plan through the detailed design (Site Plan) stage.

In response to staff comments (both Regional and Municipal), the continued review and processing of the Official Plan and Zoning By-law Amendment Applications remains appropriate based on the anticipated City timelines, directives received from City Staff to resubmit, and the



acknowledgement of the housing crisis in the area and more broadly. We expect that City staff will continue their efforts on concluding the Clarkson Transit Station Area Study in Q1 2025.

4.0 POLICY REVIEW – BASED ON UPDATED CONCEPT

Most of the policies in GSAI’s original Planning Justification Report do not need to be readdressed as the rationale remains generally relevant. The revised Concept has been reviewed through the lens of applicable policy and the following discussion is limited to the key, relevant policies to provide further justification for the changes.

Our justification on the general vision and function for Major Transit Station Area iterated through the PPS, Growth Plan, Region of Peel Official Plan (2022) and Mississauga Official Plan remain. Therefore, we have intentionally only addressed policies related to building heights and urban design including internal site configuration and programming.

For the benefit of staff, it is our opinion that this proposal remains consistent with the new policies provided under the Provincial Planning Statement (2024).

4.1 Building Orientation, Height and Massing

The buildings have been situated to strategically allocate height and distribute density across the subject site. The massing and distribution of buildings also considers both internal and external streetscape conditions and how buildings relate to both the public and private street realm, as well as in consideration of proximate residential uses. A significant portion of the site is dedicated to roads (13.67% of site area) and a new public park (11.55% of site area).

The buildings remain strategically situated on the site to maximize available space for both public and private open spaces as well as connectivity, have regard for crime prevention through environmental design principles (CPTED) and achieve appropriate building separation distances, amongst other best practices.

4.1.1 Increase in Density/Unit Yield

There is a total of 1,419 units proposed with the redesign considered and a total gross FSI of 6.33.

Note that this section does not reference all the Region’s Official Plan policies as the former justification remains relevant.

The Strategic Growth Areas identified in the Region of Peel Official Plan establish a hierarchy for which the highest densities and scale of development will be directed:

1. Urban Growth Centres
2. Major Transit Station Areas
3. Nodes/Centres
4. Intensification Corridors

The site is situated within a Major Transit Station Area, which is identified as being the second highest target area to Urban Growth Centres to support higher densities and intensified built forms. Urban Growth Centres are limited in Peel (particularly Mississauga) and it is not feasible from a



land consumption perspective nor is it a wise use of resources (including land and utilization of infrastructure) to concentrate high-density development in the defined Urban Growth Centres. Rather, it is more efficient to guide higher density development to areas where it can be supported, which has been recognized in designating and delineating Major Transit Station Areas. Based on the heights and densities historically being approved in the Urban Growth Centres, our opinion remains that the scale and density of the latest iteration of this proposal, continues to represent good planning both from a City hierarchical perspective and technical feasibility perspective as exhibited in the supporting documents provided alongside this Addendum.

Section 5.6.17 provides the following objectives related to Strategic Growth Areas:

5.6.17.3 To recognize that Strategic Growth Areas have varying capacities to accommodate future residential and employment growth

The Major Transit Station Area (Clarkson GO) is well connected through a variety of multi modal transit networks. This Major Transit Station Area has the capacity to accommodate greater heights (further supported by technical comments of the consulting team) including moderate increases in densities and conformity to the City's urban structure and hierarchy. The proposal exhibits an appropriate infill intensification opportunity (whereas other Major Transit Station Areas may be already built out or have immediate, existing limitations, thus limiting development potential). It is our opinion that this site can appropriately handle the density and mass proposed based on the existing and planned area context. The site is underutilized in its current function based on its area and locational characteristics, especially when evaluated against the policies and priorities of Major Transit Station Areas. The proposed residential density on this site supports the viability and investment in transit infrastructure.

Note that this section does not reference all of the City's Official Plan policies as the former justification remains relevant.

Section 5.0 of the Mississauga Official Plan focuses on where to direct growth and provides the following policies and objectives applicable to the proposed development:

5.1.9 New development will not exceed the capacity of existing and planned engineering services, transit services and community infrastructure. Development proposals may be refused if existing or planned servicing and/or infrastructure are inadequate to support the additional population and employment growth that would be generated or be phased to coordinate with the provision of services and infrastructure

Per the findings of the Functional Servicing Report, the development can be serviced under existing conditions through an extension of municipal services. Additionally, the development will be able to be serviced from a transit/transportation perspective with the additional unit yield. The resubmission also includes a new functional public park space which addresses distances to available parkland for the proposed residents.

Policies regarding Housing found in section 7.2.1 of the Official Plan continue to be supported by the increase in unit yield/density explored through this redesign. The various unit sizes and an



increase in housing stock is supportive of the vision for the City of Mississauga and Region of Peel. The proposal continues to provide opportunity for more affordable units, effectively supporting the general intent of Provincial, Regional and Municipal Policies related to the provision of a range of housing options in appropriate locations.

The proposal maximizes the use of existing and proposed community infrastructure and engineering services, while meeting the housing needs and preferences of existing and future residents we feel that the proposal is supportive of the above noted policies.

4.1.2 Tower and Podium Redesign

We maintain our view that it is critical for placemaking, beautification and gentle transition –which all foster a desirable pedestrian realm – that, physical interface(s) between areas are carefully addressed, notwithstanding the fact that areas throughout the City may serve a different fundamental purpose or function. We are of the opinion that the subject lands and the revised development concept continues to appropriately act as a transitional buffer from the employment lands situated further west, to the generally lower intensity proximate Clarkson Village Community Node.

As evidenced in the supporting technical reports/drawings, the proposed heights are appropriate in consideration of these transitions in support of the City Structure in the MOP and can be generally supported from an urban design perspective.

Section 5.7 of the Mississauga Official Plan prescribes the following policies related to Major Transit Station Areas. The following is relevant based on the redesign:

5.7.4.1 Minimum and maximum building heights for Protected Major Transit Station Area are shown 6.1 on Schedule 11: Protected Major Transit Station Area and referenced in Table 5-2: Protected Major Transit Station Area.

The subject site is not subject to any maximum building heights but does have regard for the balance of the OP policies which aim to guide appropriate heights in terms of the City’s hierarchy and strategic growth areas. Chapter 9 of the MOP, Build a Desirable Urban Form, sets out a policy framework which speaks to principles associated with building a desirable urban form. The following is noted as relevant with respect to the redesign of the podium(s) and tower(s):

9.1.10 The city vision will be supported by site development that:

- a. respects the urban hierarchy;*
- b. utilizes best sustainable practices;*
- c. demonstrates context sensitivity, including the public realm;*
- d. promotes universal accessibility and public safety; and*
- e. employs design excellence*

9.1.11 A distinct character for each community will be created or enhanced through the road pattern, building massing and height, streetscape elements, preservation and incorporation of heritage resources and prominent placement of institutions and open spaces.



The site development details consider urban hierarchy and are an appropriate response to the site's location within a Major Transit Station Area, which is second to an Urban Growth Centre when determining the appropriateness of increased height and densities. The project proposes built form and building heights which we anticipate are conducive with the conditions anticipated in this area and based on the trends in the Urban Growth Centres. This proposal is therefore appropriate for infilling in this Major Transit Station Area when evaluated against the goals and visions for Major Transit Station Area's in the future and the areas' role in the Urban Hierarchy.

Based on the site's location along a Corridor and within the Clarkson GO Major Transit Station Area, the proposal achieves the intent of the City's hierarchy. We are of the opinion that the design, including massing, density and scale, of sites situated along Corridors and within Major Transit Station Areas specifically, should be evaluated on a site-by-site basis. In this instance, the site's locational advantages afford it a unique opportunity to support intensification of this scale. Underproviding for heights in areas such as this is an underutilization of lands primed for development. These lands are serviced by existing infrastructure and further, intensification of such lands to reach their full potential would be consistent with the Local, Regional and Provincial policies related to leveraging opportunities for infill development in strategic areas.

The proposal presents the opportunity to provide for a contextually appropriate development that still respects the City Structure hierarchy and the evolving nature of Major Transit Station Area's as strategic growth areas. This Major Transit Station Area is unique in its opportunity to create development that, while still infill, is not as restricted or limited as other Major Transit Station Areas which have lower density housing or uses interfacing with them directly. The site and building programming including FSI and building heights, park allocation and access amongst other things have also been considered in light of the City's Clarkson Major Transit Station Area study which is establishing a new and distinct character for this section of the Major Transit Station Area. Further, this team has made it a priority to ensure that sun/shadow and other massing/bulking studies have been generally satisfied to respond to the lower density residential uses, such as those located to the southeast. In this regard, we refer the reader to the findings of the Sun/ Shadow study prepared by Gensler.

The built form proposed is ideally suited to promote universal accessibility. In consideration of pedestrian and vehicle accessibility and circulation opportunities, glazing opportunities at both ground and upper levels of the podium and considering proposed at-grade uses, opportunities for public safety are promoted. The development is supportive of CPTED considerations and the concept of eyes on the street, allowing users and residents to feel safe with engaging with the various areas across the site. The proposed development remains consistent with the above noted policies related to the creation of a desirable urban form as it proposes buildings that are strategically oriented, stepped and aesthetically designed to foster non-invasive sightlines, preserve significant views (ie. to Lake Ontario Waterfront), create a sense of place and use of the buildings and landscaping to frame streets. These design attributes, with details to be further explored during site development plan approval all contribute to project design excellence.



Along the Royal Windsor Dr. frontage, the built form positioning and mass is meant to provide a street wall treatment with a minimum setback to the street, and provision of an animated architectural façade to enhance the existing and future streetscape. The project proposes built form and building heights which we anticipate are conducive with the conditions anticipated in this area and are consistent with the City’s OP policies, specifically surrounding the City’s Hierarchy (additionally, the Corridor and Intensification Area policies) and the vision for Major Transit Station Areas.

The proposed amenity area remains located on the 8th floors of the building complexes – both indoor and outdoor. This amenity area, with its recessed floorplate sizing and connections with rooftop podium elements, will provide a staggered articulation and break up the street wall to create a more visually enticing development, characteristic of its location within a Gateway (as defined in the Official Plan). The interior of the site, featuring an east west internal driveway connection, north-south pedestrian connection from Royal Windsor to the proposed public park and spill out areas for the retail portion, as well as the building materials used for construction and soft landscaping strategies, will harmonize the project design’s beautification, site functionality and strategic intensification in an area supportive of this scale and type of density and uses.

It has also been noted that the increase in intensification or density proposed through the redesign can take better advantage of immediately proximate transit connections (MiWay and Oakville Transit bus terminal and Clarkson GO) which supports the corridor and transportation functions of the surrounding Major Roads (regionally defined) and the Major Transit Station Area.

Section 9.2.2.6 of the Official Plan provides policies related to development on Corridors. Per Schedule 1C of the Mississauga Official Plan, Royal Windsor Drive is considered a “Corridor”. Relevant policies in Section 9.2.2.6 read:

- 9.2.2.6 *Development on Corridors will be encouraged to:*
- b. face the street, except where predominate development patterns dictate otherwise;*
 - c. not locate parking between the building and the street;*
 - d. site buildings to frame the street and where non-residential uses are proposed to create a continuous street wall;*
 - e. provide entrances and transparent windows facing the street for nonresidential uses;*
 - f. support transit and active transportation modes;*
 - g. consolidate access points and encourage shared parking, service areas and driveway entrances;”*

The revisions contemplated under the current scheme continue to create a desirable street frontage by having walls that are designed to be perceived as “front walls” facing the street and providing retail frontages in locations that are appropriate and conducive to a successful retail scenario in consideration of existing context and the future direction of the Major Transit Station Area as



evidenced by the City's Clarkson Transit Station Area Study (i.e. creating a new north/south main street with retail frontages).

There continues to be limited at-grade parking proposed to support the non-residential uses and visitors, with no parking proposed between buildings and existing/proposed rights-of-way consistent with the intent of the above noted policies. The lay-by parking and internal east west (reconfigured) laneway proposed creates a safe and exclusive space for pedestrian interaction and circulation while carefully balancing expected on-site vehicular traffic. It is expected that traffic calming measures will be employed throughout the laneway in order to maintain a pedestrian-first approach internally to the site. The layout promotes access to and from the site via multi-modal transportation options. Based on the concept architectural materials to date, and as evidenced in the recently submitted site development plan package, the buildings include substantial vision glazing and where possible, primary building entrances at the street.

As illustrated on the Site Plan and Landscape Plan, site access points have been consolidated to a single access off Royal Windsor Drive at the westerly portion of the site, connecting to the proposed internal, private laneway which should assist in filtering vehicular traffic to and from the site.

Section 9.4.1 Transit and Active Transportation describes the way that the City will work to prioritize or encourage multi-modal transportation options. Policies in 9.4.1.3 read:

- “9.4.1.3 *Development will support transit and active transportation by:*
- a. locating buildings at the street edge, where appropriate;*
 - b. requiring front doors that open to the public street;*
 - c. ensuring active/animated building façades and high-quality architecture;*
 - d. ensuring buildings respect the scale of the street;*
 - e. ensuring appropriate massing for the context;*
 - f. providing pedestrian safety and comfort; and*
 - g. providing bicycle destination amenities such as bicycle parking, shower facilities and clothing lockers, where appropriate.*

- 9.4.1.4 *Development will provide for pedestrian safety through visibility, lighting, natural surveillance and minimizing vehicular conflict*

Based on the intent and vision of Major Transit Station Areas and the absence of a height prescription in this specific area, it is very clear to us that there is an intent to allow flexibility in height permissions based in area specific or site-specific attributes. Our revisioning of the podiums and towers capitalizes on the site's ability to support an increase in density while continuing to generally satisfy the City's guidelines related to sun/shadow, skyviews, sightlines and appropriate scale and massing. The site's role as a 'gateway' to the broader Major Transit Station Area influenced the building's scale, positioning, and its relationship to the new public street and Royal Windsor. Tower 2 is positioned closer to the intersection, while Tower 4 is set back significantly



from the street edge. This arrangement is carefully balanced to maximize the area available for a public park between Towers 1 and 3 to the north.

The interior to the site has been programmed to be wider and more spacious (through generous tower separations east to west) to create a more palatable, usable and appropriately scaled inner courtyard amongst taller-tower design. Soil volumes have been considered to allow significant tree planting within hardscaped areas.

It is anticipated that through the introduction of the mitigation features described in the supporting micro-climatic studies, the interior to the site as well as the private amenity areas will continue to be within the acceptable levels of comfort including from a sun shadow perspective. The Sun Shadow Study also considers the greater area context and concludes that the heights and massing are generally appropriate when evaluated against the City's Terms of Reference. This is evidenced in the Sun Shadow Study prepared by Gensler.

The Retail and Live/Work units have been designed to be 'front-facing' to public roads/streets, welcoming visitors into the site to engage with the public park and the other outdoor amenities including patios associated with the retail stores. Where appropriate based on the intended function of the interior of the site, doors for these units are facing inward to create a sense of place for residents and visitors engaging with the site and create a sense of safety and comfort.

The parking spaces and proposed underground garage entrance are proposed isolated from the Royal Windsor Dr. street frontage (access point) to minimize pedestrian and vehicular interaction. The automobile traffic internal to the site will be subject to traffic calming measures, creating a pedestrian friendly space with cross walks and soft and hard landscaping features which will be strategically chosen and placed, creating a fulsome internal design which compliments the building façade. Most of the parking, both for vehicles and bicycles remains underground and ample visitor bicycle parking is available in easily found and identifiable locations throughout the site thus promoting multi-modal connectivity. Across the site, there will be at grade, short term bicycle parking provided. The access to the site to the east has its own distinct access which will not require visitors to traverse the site via automobile to access the plaza lands (to the east).

Section 9.5 discusses site development and buildings. The following policies relate to the proposed development and its relation to the existing and proposed public realm.

"9.5.1.1 Buildings and site design will be compatible with site conditions, the surrounding context and surrounding landscape of the existing or planned character of the area."

A key point in this policy is reference to "planned character of the area". Since the original submission, the Clarkson Transit Station Area Study has continued to evolve. The Concept Plan prepared in support of this submission continues to be prepared with consideration to the ultimate vision for the Clarkson Transit Station Area Study work, as our Client continues to collaborate and



share ideas with staff. We continue to employ an assessment and evaluation of the available policies related to Major Transit Station Areas and general urban design best practices amongst other City directives and utilized our knowledge on same. To our understanding at this time, while the general vision of the submitted supporting materials remains consistent with the Clarkson Transit Station Area Study, detailed design and minor refinements are likely to be made through the Site Plan stage to better incorporate and/or improve upon the overall Major Transit Station Area vision.

9.5.1.2 *Developments should be compatible and provide appropriate transition to existing and planned development by having regard for the following elements:*

- d. street and block patterns;*
- f. continuity and enhancement of streetscapes;*
- g. the size and distribution of building mass and height;*
- h. front, side and rear yards;*
- i. the orientation of buildings, structures and landscapes on a property;*
- j. views, sunlight and wind conditions;*
- k. the local vernacular and architectural character as represented by the rhythm, textures and building materials;*
- l. privacy and overlook; and*
- m. the function and use of buildings, structures and landscapes.*

9.5.1.3 *Site designs and buildings will create a sense of enclosure along the street edge with heights appropriate to the surrounding context.*

The street pattern remains consistent with the existing development(s) and does not preclude or frustrate redevelopment of surrounding sites in the future. In fact, the development has thoughtfully catered to the existing scenarios and has provided opportunity for surrounding sites to redevelop in the future and allowing them to continue presently. The park block has been located interior to the site to be utilized for public access in the interim and ultimate scenario following build out of the Clarkson Transit Station Area Study concept.

This site and the buildings are particularly unique as the buildings are exposed and engaged from all sides. In that respect, this team has prioritized enhancement of the built façade and its interaction with the public realm and streetscaping elements. This has included reduced yard setbacks to create an urban neighborhood feel and the strategic separation, massing, step backs and building orientation so that they may remain appropriately scaled. All micro-climatic studies have been updated in accordance with the latest set of plans and appropriate mitigation features will be introduced and detailed further through the Site Plan approval stage when further studies are undertaken (however have been conceptually detailed now).



9.5.1.4 *Buildings, in conjunction with site design and landscaping, will create appropriate visual and functional relationships between individual buildings, groups of buildings and open spaces.*

It is our opinion that the revised site programming and layout is conducive to catering to the exclusivity of residents while balancing an enticing and appealing experience for visitors utilizing the public space(s) and engaging with the retail and commercial opportunities. The location of the buildings related to the interior of the site create a sense of enclosure without closing off the site to the public right of way frontages. The site programming creates an ideal relationship between the buildings and the open space/amenity areas provided by providing for four tower forms for pedestrians to interact with and a variety of soft and hard landscaping features. The functional relationships within the site have also considered and adequately addressed the City's Clarkson Land Use study elements for roads, open spaces, and connectivity to the intersection of Royal Windsor Drive and Southdown Road.

The proposal continues to offer a means of rejuvenation and improvement to the existing site and by extension, to act as a catalyst to the policy vision for this Major Transit Station Area as expressed through the City's Land Use Study which in turn will enhance the existing development in the area both functionally and visually.

9.5.1.5 *Developments will provide a transition in building height and form between Intensification Areas and adjacent Neighbourhoods with lower density and heights*

While this policy speaks specifically to Neighbourhoods, it is worth noting none of the adjacent parcels of land nor lands across Royal Windsor Drive are in a Neighbourhood as per the City's MOP. However, this policy has been considered in light of the reference to "...lower density and heights" theming which does apply for lands which are nearby and in particular, the lands at the southeast corner of Royal Windsor Drive and Southdown Road. The proposed development achieves integration with the surrounding area by recognizing the location of existing residential areas and using this consideration to inform the architectural design and massing of the proposed buildings. Consistent with policy 9.5.1.5, as the site is situated within an Intensification Area, the proposed redevelopment of this site represents an appropriate scale which is evidenced in the supporting Sun Shadow Study prepared by Gensler. We recognize that a key consideration when accommodating intensification is achieving compatibility in the context of the planned function of the site and the surrounding area.

We are of the opinion that through the site-specific regulations proposed, by providing intensification and thoughtful transitions to the existing neighbourhood(s), while generally achieving the policy intentions for residential uses, particularly apartment uses, along corridors and within Major Transit Station Areas, we are meeting the general intent of the broader City MOP design policies. The development presents the opportunity to provide for a contextually appropriate



development that still respects the City Structure hierarchy and the evolving nature of Major Transit Station Areas as strategic growth areas.

Similarly, Section 9.5.2 Site Development provides:

“9.5.2.2 Developments will be sited and massed to contribute to a safe and comfortable environment for pedestrians by:

- a. providing walkways that are connected to the public sidewalk, are well lit, attractive and safe;*
- b. fronting walkways and sidewalks with doors and windows and having visible active uses inside;*
- c. avoiding blank walls facing pedestrian areas; and*
- d. providing opportunities for weather protection, including awnings and trees.*

9.5.2.3 Development proponents will be required to ensure that pedestrian circulation and connections are accessible, comfortable, safe and integrated into the overall system of trails and walkways

As illustrated on the Landscape Plan as prepared by JRS dated September 2024, accessibility and pedestrian safety is accommodated through the design of continuous pathways and the establishment of pedestrian and cycling connections at major points of access and service. The internal programming of the site prioritizes pedestrian circulation and safety. Through the use of a built form and site design elements which incorporate accessibility features, this project further provides housing opportunities whether for new residents, or existing residents needing to fulfill personal accessibility requirements including aging in place. Pavement marking plans as well as other detailed design strategies will be refined through the Site Plan stage in order to assist in the functionality and the safety of the site. Implementation of urban design strategies including building treatments, as well as landscaping strategies will be a priority through the detailed design process in order to take advantage of the site’s unique internal configuration.

5.0 CONCLUSION

It is our opinion that the revised development concept and the proposed regulations laid out in the revised Official Plan Amendment and Zoning By-law Amendment are justified and represents good planning:

1. The proposal conforms to and promotes the policies of the Provincial Policy Statement, Growth Plan (both of which were relied upon at the time of the original submission), as well as policies regarding residential intensification in the Region of Peel Official Plan, the City of Mississauga Official Plan;
2. The proposed Official Plan provisions and zoning standards are appropriate to accommodate the



requested uses based on the proposed uses, built forms, heights, transitions and general site design;

3. The proposed uses are compatible with the surrounding land uses and are desirable in fulfilling the general intent and vision of the current and future City MOP as expressed through the existing MOP with recent additions reflecting policies addressing Major Transit Station Areas as well as through the ongoing Clarkson Transit Station Area Study work;

4. The proximity of the proposed development to community amenities such as parks, community centres, schools, shopping, entertainment as well as bus routes, and connectivity options to train networks to assist with access contributes to the reduction in reliance on automobile use and encourages active transportation and public transit options and contributes to the development of complete communities;

5. The proposed reduced parking ratio is supportable by the area's walkability, provision of transit infrastructure and close range services and facilities;

6. The proposed development is compact in form while also considering risks to public health and safety through detailed analysis of sub-fields including landscape design, architecture, shadowing and engineering and servicing;

7. The proposed development includes open space areas which contribute to community connectivity, creates opportunities for active transportation and recreation and the maintenance of healthy communities;

8. The proposed development contributes to the overarching policy objective of creating complete communities by also including beyond residential and open space lands, jobs through the incorporation of new retail and live/work units; and,

9. The proposed Retail portion will continue to adequately serve existing area residents and future residents of the development.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

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