
HOUSING REPORT

IN SUPPORT OF

OFFICIAL PLAN AMENDMENT & ZONING BY-LAW AMENDMENT APPLICATIONS

PREPARED FOR

Stephen-Mitchell Realty Limited, Whitehorn
Investments Limited & Lynrob Investments
Limited

1225 Dundas Street East
City of Mississauga
Regional Municipality of Peel

August 2024
GSAI File # 1415-002
City File #OZ/OPA 22-30 W3



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Housing Report
Stephen-Mitchell Realty Limited, Whitehorn Investments Limited & Lynrob Investments Limited
Official Plan Amendment & Zoning By-law Amendment
1225 Dundas Street East
City of Mississauga

1 / INTRODUCTION

Glen Schnarr & Associates Inc. ('GSAI') has been retained by Stephen-Mitchell Realty Limited, Whitehorn Investments Limited and Lynrob Investments Limited. (collectively, the 'Owner') to prepare a Housing Report ('Report') in support of the planned redevelopment of the lands municipally addressed as 1225 Dundas Street East, in the City of Mississauga (the 'Subject Lands' or 'Site'). This Report was identified and requested as a submission requirement as part of the pre-submission Development Application Review Committee ('DARC') meeting process held in March 2022. Subsequent to this meeting, the Housing Report Terms of Reference were provided as were housing-related comments by the City's Housing Coordinator. The Housing Report Terms of Reference are provided in **Appendix I** of this Report.

A Housing Report, prepared by GSAI, dated July 2022 was previously prepared and provided in support of the initial submission of this Official Plan Amendment and Zoning By-law Amendment application in July 2022. In the time since this initial submission, the policy framework and development vision for the Site have evolved. As such, this Housing Report has been prepared in support of the current development as contemplated. For clarity, this Housing Report supersedes the previous Housing Report, dated July 2022.

2 / BACKGROUND

The Owner is planning to redevelop the Subject Lands – a commercial parcel with an area of approximately 1.29 hectares (3.19 acres). As further described in **Section 4** of this Report, the Owner is seeking permission to redevelop the Subject Lands for a compact, pedestrian-oriented, mixed-use development containing approximately 674 dwelling units. To achieve this objective, the Owner is advancing an Official Plan Amendment ('OPA') and Zoning By-law Amendment ('ZBA') Application (the 'Application', City File No. OZ/OPA 22-30 W3). The City of Mississauga (the 'City') requires a Housing Report to be provided in support of an Application where 50 or more units are being proposed in a medium- or high-density built form. Based on the above, a Housing Report is required in support of the proposed development.

The City has further requested that all new development applications containing 50 or more ownership or purpose-built rental units that are located in communities outside of designated mall-based Community Nodes provide at least ten percent (10%) of units as affordable 'middle income' housing units. Where a development is located within a designated mall-based Community Node area, the City requests that twenty percent (20%) of units be provided as affordable units. We note that the City has clarified that the requested affordable unit provision rates exempt the first 50 units, but applies to the balance of the proposed units beyond the first 50 units. Additionally, the City of Mississauga Housing Strategy defines an affordable 'middle income' housing unit as one that can be purchased for \$420,000 or less.

3 / SITE

We note that establishment of municipal affordable housing targets, and this issue is further discussed in **Section 5** of this Report, is a subject that can be raised in a municipal Housing Strategy Report and promoted within a municipality's Official Plan policies that encourage the municipality to partner with builders, participate in programs with other levels of government or provide economic incentives towards building affordable housing. The establishment of affordable housing 'quotas' is a separate matter and requires a municipality to have the necessary legal instruments in place in accordance with Provincial legislation, that allows a municipality to implement Inclusionary Zoning to reach established quotas. As further discussed in **Section 5.9** of this Report, the City of Mississauga completed an Inclusionary Zoning Study and as such, has the legal instruments to allow the City to achieve specific affordable housing quotas.

As demonstrated in **Figure 1** on the next page, the Subject Lands are located on the north side of Dundas Street East, east of Arena Road, in the Applewood community of the City of Mississauga.

Section 3 of the Planning Justification Report ('PJR'), prepared by GSAI, dated June 2024, provides further information on the Site and the surrounding context. The Site is currently improved with a local retail plaza comprised of a low-rise, multi-tenant commercial structure and surface parking areas.

Surrounding land uses are as follows:

NORTH

Low-rise residential built forms are immediately north. A segment of the Applewood Neighbourhood continues to the north. This segment is predominantly comprised of low-rise residential dwellings of varying built forms, a park and a segment of Little Etobicoke Creek.


SOUTH

Dundas Street East is immediately south. Further south is an established Employment Area comprised of various low-rise commercial structures and surface parking areas..

EAST

A mid-rise (5-storey) apartment building is immediately east. Further east is Queen Federica Drive, tall apartment structures fronting along Queen Federica Drive (including a 15-storey structure at 3025 Queen Frederica Drive) and a retail plaza comprised of four (4) low-rise, detached commercial structures with accessory drive-through facilities, a low-rise, multi-tenant commercial structure and surface parking areas.



LEGEND
 Subject Lands

4 / PROPOSAL

WEST

Arena Road is immediately west. Further west is a further segment of the Applewood community comprised of low-rise residential built forms and a local retail plaza comprised of three (3) low-rise, detached commercial structures, a low-rise multi-tenant commercial structure and surface parking areas.

The Owner is seeking permission to redevelop the Subject Lands for a compact, high-density, pedestrian-oriented, mixed-use development. The proposed development contemplates the introduction of five (5) structures (Buildings 'A', 'B', 'C', 'D' and 'E') of varying height, organized around a central landscaped courtyard and public realm enhancements.



Proposed rendering of the development, looking northeast across the Subject Lands (image provided by Turner Fleischer Architects)

The proposal has also been planned and designed around the introduction of an optimal site design and high-quality, refined built forms. Overall, the proposed development is to have a total gross floor area ('GFA') of the proposed development is to have a total gross floor area ('GFA') approximately 47,546.6 square metres (511,787 square feet), resulting in a density of 3.82 Floor Space Index ('FSI').

Building 'A', which is to have a total height of 18 storeys, is positioned in the southern quadrant of the Site. The structure features a terraced built form and two (2) point tower components rising above a shared 9-storey podium. Building 'A' is positioned in such a manner that it fronts onto and addresses the Dundas Street East corridor. Overall, the proposed structure features a terraced built form which is achieved through the provision of stepbacks along the Dundas Street East frontage as well as along the eastern, western and rear facades. Furthermore, the proposed structure incorporates the provision of private terraces and

facilitates a built form, massing and development scale that provides for an appropriate transition to the surrounding area. We note that the proposed structure is to feature direct pedestrian connections from Arena Road and Dundas Street East, allowing for safe, comfortable and accessible connections to the public sidewalk. A highly visible and easily accessible residential lobby is also to be provided. Access to the shared below-grade parking structure has been integrated into the structure's internal façade.

Buildings 'B', 'C', 'D' and 'E' are positioned in the Site's northern quadrant and are to feature 3-storey, back-to-back townhouse built forms. Each dwelling is to have a highly visible front entry off of the public realm, which provides visual consistency with the townhouse dwellings which surround the Site.

A variety of landscaped open spaces and outdoor amenity areas are to be provided. This includes a central landscaped outdoor courtyard, landscaped outdoor amenity areas as well landscaped open space areas along the property lines. The proposed landscaped areas and outdoor amenity areas have been planned and designed to be complimentary to the proposed site design and programming. Overall, a series of landscaping and streetscape enhancements are to be provided. This includes streetscape treatments along the Site's frontages so that a high-quality, inviting, pedestrian-oriented environment is provided.

5 / PLANNING CONTEXT

A total of 642 apartment-style and townhouse-style dwelling units of varying size and configurations are to be provided. This includes the provision of one-bedroom and family-sized units. As such, the proposed mixture of units will provide greater housing choice for households of varying size, income levels and lifestyle preferences. The anticipated unit composition is as follows:

UNIT TYPE	UNIT SIZE	NO. & % OF UNTIS
One Bedroom	42.8 – 55.3 square metres (460 – 595 square feet)	397 (61.8%)
Two Bedroom	72.0 – 85.1 square metres (775 – 916 square feet)	188 (29.3%)
Three Bedroom or Larger	86.6 – 126.6 square metres (932 – 1,362 square feet)	57 (8.9%)

In response to a price sensitive and diverse local market, and in the interest of advancing housing options for buyers seeking proximity and ease of access to transit services, amenities and services as well as the needs of families, the proposed unit distribution and unit sizes have been carefully considered. It is currently anticipated that units are to be ownership units, sold at market prices. See the Housing Report Table in **Appendix II** of this Report for further detail.

At this juncture, a Draft Plan of Condominium application has not been submitted. As such, it is anticipated that this future application will be advanced and provided once there is a level of comfort received from Staff that the proposed development is supported through the OPA and ZBA process, as well as the ongoing SPA process.

The Housing Report Terms of Reference (see **Appendix I** of this Report) requires an analysis of how the proposed development addresses the relevant Provincial, Regional and local policy framework related to housing. This Section of the Report provides an overview and analysis of the relevant Provincial, Regional and local housing-related policies that apply to redevelopment of the Subject Lands.

5.1 / PROVINCIAL POLICY STATEMENT, 2020

The Provincial Policy Statement ('PPS'), 2020 provides policy direction on matters of Provincial interest related to land use planning and development with the goal of enhancing the quality of life for all Ontarians. The following policies apply.

'1.1.1. *Healthy, liveable and safe communities are sustained by:*

- a) *accommodating an appropriate and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons)...'*

'1.4.3. *Planning Authorities shall provide for an appropriate range and mix of housing options and densities to meet the projected market-based and affordable housing needs of current and future residents of the regional market by:*

- a) *establishing and implementing minimum targets for the provision of housing which is affordable to low and*

moderate income households and which aligns with the applicable housing and homelessness plans. However, where planning is conducted by an upper tier municipality, the upper tier municipality in consultation with the lower tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower tier municipalities;

- b) *permitting and facilitating:*
 - 1. *all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements arising from demographic changes and employment opportunities; and*
 - 2. *all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;*
- c) *directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;*
- d) *promoting densities for new housing which efficiently use land, resources, infrastructure and public services facilities and support the use of active transportation and transit in areas where it exists or is to be developed;*
- e) *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.'*

The proposal will facilitate residential intensification on the Subject Lands through compact built forms that will introduce 642 new residential dwelling units of varying size and configurations. As stated above, a mixture of one-bedroom and family-sized units are to be provided. This will support housing choice for current and future residents of the community of varying household size, income levels, life stages and lifestyle preferences. Additionally, the proposal will facilitate development that is supported by existing infrastructure networks, active transportation, transit service networks and by a variety of facilities and local retailers – many within a comfortable walking distance. It will also further enhance the ability for daily needs of residents to be met within a comfortable walking distance. For the reasons outlined above, it is our opinion that the proposed development is consistent with the PPS housing policies.

5.2 / A PLACE TO GROW, 2020

A Place to Grow: Growth Plan for the Greater Golden Horseshoe ('A Place to Grow') was updated on August 28, 2020. A Place to Grow, 2020 builds on the policy foundations of the PPS, 2020 and establishes a long-term framework for managing growth and development across the Greater Golden Horseshoe ('GGH') region up to the year 2051. Overall, A Place to Grow encourages the efficient use of land through the development of complete communities that are compact, transit-supportive and provide a range of housing and employment opportunities. The following policies apply.

'2.2.1.4. Applying the policies of the Growth Plan will support the achievement of complete communities that:

b) provide a range and mix of housing options, including second units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all households sizes and incomes.'

'2.2.6.2. Notwithstanding policy 1.4.1 of the PPS, 2020, in implementing policy 2.2.6.1, municipalities will support the achievement of complete communities by:

*c) considering the range and mix of housing options and densities of the existing housing stock; and
d) planning to diversify their overall housing stock across the municipality.'*

'2.2.6.3. To support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.'

The proposed development will contribute to achieving complete communities by facilitating a compact development on underutilized lands in close proximity to existing and planned transit networks, active transportation and nearby amenities that support daily living. Furthermore, the proposal will provide for dwelling units of varying unit size and configurations. This will contribute to housing diversification and offer greater housing choice for current and future Applewood households of differing sizes, incomes, life stages and lifestyle preferences.

Overall, it is our opinion that the proposed development conforms to the applicable policies of A Place to Grow by facilitating contextually appropriate redevelopment to occur in an appropriate location.

5.3 / REGION OF PEEL OFFICIAL PLAN, 2022

The Region of Peel Official Plan ('ROP') serves as Peel's long-term guiding document for how land use planning is to occur and how growth is to be managed. Overall, the ROP (November 2022) outlines strategies for managing growth and development across Peel to the year 2051 in accordance with a Regional Structure (Schedule E-1). In accordance with the Regional Structure, the Subject Lands are identified as an appropriate and desirable location for redevelopment to occur. The following policies apply.

'5.6.19.5. Support a mix of multi-unit housing, including affordable housing, rental housing and additional residential units, as appropriate.'

'5.9.1. To promote the development of compact, complete communities by supporting intensification and higher density forms of housing.'

'5.9.2. To achieve Peel-wide new housing unit targets shown in Table 4, which provide an appropriate range and mix of housing options and densities, including affordable housing, that meet local housing need so that people can live in the community of their choice.'

'5.9.7. Collaborate with the local municipalities to plan for an appropriate range and mix of housing options and densities by implementing Peel-wide new housing unit targets shown in Table 4.'

'Table 4 – Peel-Wide New Housing Unit Targets

<i>Target Area</i>	<i>Targets</i>
<i>Affordability</i>	<i>That 30% of all new housing units are affordable housing, of which 50% of all affordable housing units are encouraged to be affordable to low income households</i>
<i>Rental</i>	<i>That 25% of all new housing units are rental tenure</i>
<i>Density</i>	<i>That 50% of all new housing units are in forms other than detached and semi-detached houses</i>

'5.9.21. Collaborate with the local municipalities to explore offering incentives to support affordable and purpose-built rental housing to achieve the Peel-wide new housing unit targets shown in Table 4.'

'5.9.27. Collaborate with the local municipalities and other stakeholders such as the conservation authorities, the building and development industry, and landowners to encourage new residential development, redevelopment, and intensification in support of Regional and local municipal official plan policies promoting compact built forms of development and residential intensification.'

'5.9.36. Seek opportunities to provide an appropriate range and mix of housing options and densities, including affordable housing, that utilize existing stock.'

'5.9.51. Collaborate with the local municipalities to develop options to provide opportunities to meet the housing needs of diverse populations.'

In accordance with Schedule E – 1, Regional Structure, the Subject Lands are located within the Region's Urban Area. The Subject Lands are also identified as being located within a Strategic Growth Area and within a Primary Major Transit Station Area by the in-effect ROP. As such, the Subject Lands are an appropriate and desirable location for compact development to occur.

The proposed development, through the introduction of more than 640 apartment-style and townhouse-style dwelling units of varying size and configurations, will contribute to the provision of a range and mix of housing opportunities. Furthermore, the proposal achieves the above-noted Regional policies by supporting the provision of greater housing choice for current and future residents of varying household size, income level, life stage and lifestyle preference. The proposal will also enable residents to remain in their community.

5.4 / PEEL HOUSING & HOMELESSNESS PLAN

Home For All – Peel Housing and Homelessness Plan, 2018 – 2028 ('Home For All') was adopted in April 2018. Home For All, while not an operative part of the ROP, serves to further implement the ROP's housing policies. Overall, a Home For All establishes a series of objectives for the period between 2018 and 2028 to improve housing outcomes. This is to be achieved by focusing efforts and funds to advance five (5) strategies. These strategies are as follows:

Strategy 1: Transform Service – create new service delivery model to improve access to subsidies, divert people from shelters, improve successful tenancies and prevent homelessness.

Strategy 2: Build More Affordable Housing – shift to a more planned approach to affordable housing development, guided by targets and a long-term Housing Master Plan.

Strategy 3: Incent Building Affordable Housing – encourage non-profit and private developers to build rental stock that meet the affordable housing needs within Peel.

Strategy 4: Optimize Existing Stock – develop new strategies to leverage existing private stock to create more and different affordable housing options.

Strategy 5: Increase Supportive Housing – work with housing providers and other partners to expand the supply of supportive housing and supports provided to existing tenants.

Based on the above, a series of actions are identified. A Home For All also provides a comprehensive analysis of household income trends. Based on this analysis, low-, middle-income and middle-income or higher affordable housing targets have been established.

Overall, a Home For All identifies that 50% of all new housing is encouraged to be located in medium or high-density development. Given the proposed development is for ground-related, low-density housing forms, the housing targets identified in a Home For All are best satisfied through other development projects.

We note that a Home For All does not provide any economic incentive(s) to encourage the creation of new affordable housing units, rather it is stated that other levels of government are to put forward the necessary incentives to solve the housing affordability challenge.

5.5 / PEEL AFFORDABLE HOUSING INCENTIVE

In May 2020, the Region of Peel introduced the Affordable Housing Incentives Pilot Program ('Program'). The objective of the Program was to provide Regional incentives for the development of sustainable affordable purpose-built rental housing units.

In accordance with the Program, an eligible development would receive a capital grant toward the provision of affordable, purpose-built rental units. In total, \$7,500,000 in total funding was available. Eligibility to receive a proportion of this funding was determined based on evaluation criterion and an applicant's ability to prepare and provide an application. More specifically, the following eligibility criterion must be met:

- Applicants must propose a minimum of 5 affordable units;
- 'Affordable' refers to the pilot program definition, which is 135% of median market rent by local municipality;
- The affordable units must be primarily 2 and 3+ bedroom units. More specifically, approximately 50% of units are to be 2-bedroom units and a further 35% of units are to be 3+-bedroom units. This is based on Peel's middle-income housing needs;
- Units receiving incentives must be maintained as affordable for a minimum of 25 years;
- The entire building must operate as rental for the duration of the agreement;
- Applicants must have experience developing housing and managing rental housing or retain the services of an organization with that expertise.

In November 2021, following a review of eligible Pilot Program applications, Regional Council selected three (3) applicants to receive funding. Based on this, Regional Council will provide funding to create 130 affordable rental housing units across Peel and these new units are to have an affordable rental rate for a period of 26 to 41 years. We note that awarding of funding for the 2021 Pilot Program is complete.

In July 2022, the Region of Peel announced that the Program was to be rebranded as the 'Peel Affordable Rental Incentives Program' and would become an annual Program. The objective of the Program is to support private and non-profit developers to construct affordable rental housing. A total of \$2.5 million in funding was available in 2022 for eligible projects. This was increased to \$10 million in available funding for 2023. Between July 2022 and March 2024, three (3) projects received funding under the Peel Affordable Rental Incentives Program during the 2023 Call for Applications. Since the program's launch in 2022, a total of four (4) out of 6 affordable rental housing projects have received funding to introduce purpose-built affordable rental housing units on sites within the City of Mississauga. Further detail on whether the Program will be renewed and a 2024 Call for Applications will be launched is not yet available.

Based on the above, the proposed development does not qualify as an eligible project for the following reasons:

- The proposal, as contemplated, does not include the provision of purpose-built affordable rental units;
- The proposal does not contemplate the provision of the desired range of bedroom units given current market trends and pricing constraints; and,
- An experienced rental housing developer or organization has not been retained.

5.6 / MISSISSAUGA OFFICIAL PLAN, 2024

The Mississauga Official Plan ('MOP'), as amended, identifies the long-term framework for managing growth and development across Mississauga. The following polices apply.

- '7.1.6. *Mississauga will ensure that the housing mix can accommodate people with diverse housing preferences and socioeconomic characteristics and needs.'*
- '7.2.2. *Mississauga will provide opportunities for:*
 - a) *the development of a range of housing choice in terms of type, tenure and price;*
 - b) *the production of a variety of affordable dwelling types for both the ownership and rental markets.'*
- '7.2.3. *When making planning decisions, Mississauga will ensure that housing is provided in a manner that fully implements the intent of the Provincial and Regional housing policies.'*
- '7.2.4.. *Mississauga will ensure that the quality and quantity of the existing housing stock is maintained.'*
- '7.2.5. *The onus will be placed on the applicant / developer to address Provincial and Regional housing requirements.'*

The proposed development will provide for 642 new apartment-style and townhouse-style dwelling units of varying size. These units will facilitate housing choice for current and future residents, including young families, young adults, older adults and those households wishing to stay within their community.

Overall, the proposal will contribute to the achievement of local policy objectives by accommodating new housing in a well-designed, refined built form, at an appropriate location that is in proximity to infrastructure, existing and planned transit, active transportation networks, services and facilities.

Based on the above, it is our opinion that the proposal is consistent with Mississauga Official Plan policies.

5.7 / MISSISSAUGA HOUSING STRATEGY

Making Room for the Middle: A Housing Strategy for Mississauga ('Housing Strategy') was adopted by City Council in October 2017. The Housing Strategy identifies a series of actions that are to guide the development of housing that is affordable for various households. Overall, it addresses the issue of housing affordability and emphasizes the need to address the 'missing middle' who are understood to be those middle income earners who have been priced out of the market for vertically divided ground-related housing forms.

The Housing Strategy makes the following observations:

Housing is considered affordable when:

- *It costs less than 30% of annual gross household income;*
- *Prospective homeowners can afford to pay from approximately \$270,000 to \$400,000, but in Mississauga this can only buy a condominium apartment or a limited selection of townhouses;*
- *For rental housing, it is a monthly rental rate of approximately \$1,200.*

Middle income households are:

- *Those that earn between \$55,000 and \$100,000 per year*
- *For those that rent, they can pay market prices but have difficulty finding units that suit their needs*
- *The competition for housing in this price range is higher than the supply*

As stated above, the proposed development is anticipated to be ownership in tenure. In an effort to respond to the local market, the proposal contemplates high-quality, refined built forms and apartment-style and townhouse-style units. Furthermore, given the built form and unit sizes contemplated as well as local market considerations, the proposal does not contemplate units that can be considered to be generally affordable to middle income households. However, the surrounding community includes a diversity of housing types which provide units that have unit sizes that are understood to be more affordable to middle income earners and housing with locational attributes allowing residents to be in proximity to transit services and near a variety of services and amenities. Based on the above, the proposed development is not an ideal location for the Mississauga Housing Strategy objectives to be achieved.

5.8 / GROWING MISSISSAUGA, 2023

Growing Mississauga: An Action Plan for New Housing ('Action Plan') was adopted by City Council in February 2023. The Action Plan serves as the City of Mississauga's Housing Pledge, in response to the Provincial housing crisis and Government of Ontario's housing pledge. In accordance with Bill 23 and the Provincial housing pledge, the Province allocated 8% of all new housing units to be introduced across the City of Mississauga – or the equivalent of 120,000 new housing units by the year 2031.

The Action Plan identifies a series of actions that are to guide the development of housing that will enable the City to meet the Provincial housing commitment. Overall, it identifies five (5) goals and twenty-three (23) actions that are to be taken.

Overall, the Action Plan emphasizes that the City's housing pledge can be met by directing the majority of new housing units to be introduced through infill developments and through the introduction of apartment-style units in built forms of varying heights. Furthermore, the Action Plan states that a majority (97,500) of new housing units are to be directed to occur in Major Transit Station Areas / Strategic Growth Areas of the City. The proposed development will support the City's achievement of its housing pledge through the introduction of more than 640 new housing units in an appropriate location within a Major Transit Station Area, where such development ought to occur and through the introduction of apartment-style and townhouse-style or missing middle housing units.

5.9 / INCLUSIONARY ZONING STUDY

The City of Mississauga recently completed an Inclusionary Zoning Study ("Study"). The Study culminated in a City-initiated Official Plan Amendment ('OPA') to implement Inclusionary Zoning policies and a City-initiated Inclusionary Zoning By-law. The policy framework, adopted by City Council on August 10, 2022, requires that any development which meets eligibility requirements is to provide a percentage of new housing as long-term affordable housing units.

In accordance with Ontario Regulation 282/18, it is understood that Inclusionary Zoning is one planning tool available to municipalities to require the provision of new affordable housing units. Based on the City of Mississauga Inclusionary Zoning Study's policy framework, it is understood that only developments which meet the following eligibility criteria would be subject to Inclusionary Zoning:

- A development has 50 or more ownership units or has 3,600 square metres or more gross floor area for residential purposes; and,
- A development is located within an Inclusionary Zoning Area.

Should a development satisfy the above-noted eligibility requirement, a percentage of a development's total gross floor area ('GFA') will be required to be provided as affordable ownership or affordable rental housing units. The amount of GFA required to be provided as affordable dwelling units is to be based on a site's location – more specifically, the City has been organized into Inclusionary Zoning Areas ('IZ Areas').

Each IZ Area has an identified 'set aside' rate – being the amount of a project's GFA to be provided as affordable housing units. We understand that a range and mix of affordable units are to be provided. Furthermore, affordable ownership and affordable rental units provided are to remain affordable for the long-term. Finally, a range of incentives, including reduced parking standards, may be considered.

In the case of the Subject Lands, the Site is located within a Protected Major Transit Station Area and within an IZ Area. However, given the date of the initial Application and the initial Site Plan Approval ('SPA') application in July 2022, **the Subject Lands are exempt from Inclusionary Zoning requirements.** Given this, the proposal is only subject to compliance with the in-effect Provincial, Regional and local housing-related policy provisions.

6 / ANALYSIS & OPINION

We understand that City Staff have requested that 10% of the proposed units, beyond the first 50 units proposed, be sized and priced to meet the middle income threshold of \$420,000. In the case of the Subject Lands, this would require that the Owner provide approximately 60 (rounded to the nearest whole number) affordable units. As stated above, the proposed development contemplates a range of apartment-style and townhouse-style units of varying size and configurations. Based on market trends and the proposed development, it is unreasonable to assume that even the smaller units contemplated would be considered as affordable units to middle income households. Given the City's request for the Owner to provide 60 affordable housing units, it is our opinion that the provision of these affordable housing units is not viable nor efficient. Furthermore, given the current market trends, it is unreasonable to assume that the proposed units would be made available at slightly below, at or slightly above the middle income price threshold of \$420,000. The provision of affordable units to middle income households is best accommodated off-site.

We note that based on the in-effect policy and regulatory framework as outlined in Section 5 does not legally require the provision of affordable housing units on the Subject Lands. We further note that the City of Mississauga is establishing regulations that would require qualified purchasers within the middle income range to complete a signed legal Declaration (see image on the right) confirming that their income does not exceed the middle income threshold and that any unit purchased will be their principal residence.

As stated throughout this Report, the Subject Lands are to be redeveloped for market-based ownership housing that is being targeted to families, commuters, young professionals and empty nesters. The proposal does not contravene or offend any Provincial, Regional or local policies. More specifically, it represents a proposal for intensification on underutilized lands in a manner that better positions development in an appropriate location, at an appropriate density, in proximity to transit services, destinations and amenities. Furthermore, it is our opinion that the proposal complies with the in-effect Provincial, Regional and local policy framework.

Declaration of Household Income and Principal Residence Form

The [City's Housing Strategy](#) is focused on increasing the supply of affordable housing to middle-income families in Mississauga. To support this objective, developers are providing affordable units – for \$420,000 or less – within their housing developments.

To qualify for this type of unit, potential buyers must complete this form to prove they have a total household income of less than \$108,000 a year, and that the unit shall be their principal residence.

A Commissioner of Oaths, notary or lawyer, must witness your form.

Submit your completed form to the developer of the unit, who'll then send it to the City.

Your completed form is part of public record and will be available for viewing by any member of the public, upon request.

If you've any questions, please contact Catherine Parsons at 905-615-3200 ext. 8409, or email catherine.parsons@mississauga.ca.

7 / SUMMARY & CONCLUSIONS

As outlined above, the proposed development represents an appropriate development for the Subject Lands that is in keeping with Provincial, Regional and local policies. Furthermore, the proposed development will provide for contextually appropriate redevelopment of lands that are well served by transit and existing infrastructure and makes better use of land, resources and infrastructure. The proposal, as contemplated, will provide for a range of compact, refined, apartment-style and ground-oriented housing options for households of varying size, incomes, life stages and lifestyle preferences. It will also provide market-based housing options that are well-served by existing community services, parks, local businesses and destinations.

Based on the above analysis, we conclude that the proposal conforms to the applicable Provincial, Regional and local policies and represents good planning.

Yours very truly,
GLEN SCHNARR & ASSOCIATES INC.



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APPENDIX I / *Housing Report Terms of
Reference*

Preamble

Housing is unaffordable for almost 1 in 3 Mississauga households. Mississauga's middle income households – who are a critical part of the city's workforce and community – are increasingly challenged to find housing that meets their needs and income levels. To ensure the long term health and viability for our city, meaningful action to address housing affordability is required.

In 2017, City Council approved *Making Room for the Middle – a Housing Strategy for Mississauga*. The Housing Strategy outlines the City's action plan to address housing affordability, including encouraging new development that is affordable to middle income households. Mississauga Official Plan also provides direction on housing priorities. Policy 7.1.6 stipulates that Mississauga will ensure the housing mix can accommodate people with diverse housing preferences and socio-economic characteristics and needs. Policy 7.2.3 directs that Mississauga will ensure housing is provided in a manner that fully implements the intent of Provincial and Regional policies. Policy 7.2.5 stipulates that the onus will be placed on the applicant/developer to address Provincial and Regional housing requirements.

To create complete, inclusive communities, planning applications and decisions need to address housing affordability. The City will work with the development community to fulfill housing objectives.

Purpose

The purpose of the Housing Report is to demonstrate how larger and / or phased developments meet Provincial, Regional, and City housing objectives, including the provision of housing that is affordable to middle income households. The Housing Report will provide information about the proposed development including tenure, number of units by bedroom type, proposed prices / rents, and planning rationale, which includes housing affordability. Appendix 1 outlines required contents of the Housing Report.

Application Type

A Housing Report shall be submitted in support of a complete application for all official plan amendment, rezoning, and plan of subdivision applications proposing 50 or more ownership residential units. In some cases, these developments will also trigger a request for the provision of affordable middle income housing. Please refer to Table 1 for clarification on when the provision of affordable middle income housing will be requested.

Table 1 – When will the City Request Affordable Middle Income Housing?	
Request for Affordable Middle Income Housing	No Request
<ul style="list-style-type: none"> Official plan amendments, rezonings, and plan of subdivisions involving 50 or more residential units Ownership development proposals only 	<ul style="list-style-type: none"> Purpose-built rental developments Seniors / retirement developments Developments of less than 50 residential units Non-residential developments Lifting of "H" Provision

Provision of Affordable Middle Income Housing

The City is requesting the provision of affordable middle income housing units at a **minimum rate** of 10%. The 10% contribution rate is not applied to the first 50 units of a building. For example, if a development is 100 units in total, the contribution request is 5 units [(100 units – 50 units) x 10%]. If the development is 53 units in total, the contribution request is rounded up to 1 unit [(53 units – 50 units) x 10%]. In mid-rise and high-rise development, the rate is applied to each building, whereas in low-rise developments, the rate is applied to the site.

Two exceptions to the contribution rate identified above should be noted:

- 20% of units proposed on [Reimagining the Mall](#) sites should be affordable (Council Resolution 0150-2019).
- The number of affordable units requested can be lowered for developments proposing deeply affordable units.

The City will consider alternatives to on-site unit contributions, including off-site unit contributions, land dedication, or financial contributions for affordable middle income housing elsewhere. If off-site units or land are dedicated, the location should be similar to the primary development site in terms of access to amenities, services, and transit.

What is affordable to middle income households?

For the purposes of this Housing Report Terms of Reference, affordable middle income housing costs no more than 30% of gross annual household income for middle income households, who earn approximately \$55,000 to \$100,000. Affordability thresholds for ownership and rental housing are outlined in Table 2 below.

Table 2 – Affordability Thresholds		
Affordable Ownership Price Threshold		
\$420,000 or less		
Affordable Rent Threshold –1.5 x Average Market Rent (AMR)*		
Unit Type	2018 AMR*	1.5 x AMR or less
Bachelor	\$922	\$1,383
1 Bedroom	\$1,233	\$1,850
2 Bedroom	\$1,396	\$2,094
3+ Bedroom	\$1,590	\$2,385

*Source - Canada Mortgage and Housing Corporation (CMHC) Rental Market Survey, October 2018. AMR will be annually updated.

Note – While the request for an affordable contribution will only occur where ownership tenure is proposed, the affordable units provided can be rental or ownership tenure.

Duration and Administration

Affordable units should remain affordable for at least ten years after occupancy. It may be beneficial for the proponent to consider partnerships with non-profit organizations for the construction / administration of the affordable units, or to consider transferring units to a non-profit housing provider. Innovative forms of ownership are also possible.

How will the Housing Report be used by the City?

The Housing Report will assist the City in understanding how the proposed development will advance the housing mix, targets and affordability objectives of the City of Mississauga and Region of Peel. Recognizing that in some cases incentives or partnerships may be available, the report will also enable staff and development proponents to engage early in the development process and advance discussions regarding access to provincial and federal funding, and possible municipal incentives offered through a Community Improvement Plan.

How will the Housing Report affect my application?

Proposed developments must first and foremost meet the tests of good planning. Demonstrating progress towards the achievement of Provincial, Regional, and City housing objectives also falls within that scope. More information about the Housing Report can be obtained from Catherine Parsons, Planner, City Planning Strategies Division, Planning and Building Department at 905-615-3200 ext. 8409 or catherine.parsons@mississauga.ca.

Appendix 1 – Contents of Housing Report

Part A – Please provide the following information:

1. Description of the Proposal (Including File #)

- Include number of units by unit type and proposed prices / rents. **Please see table on next page.** This table should form part of your Housing Report submission and simplify the preparation of the Housing Report.

2. Relevant Planning Process and Other Related Applications

- OPA, ZBL, Plan of Subdivision, Plan of Condominium, etc.

3. Identification of any Additional Considerations

- inclusion of supportive housing
- financial or land contributions towards affordable housing
- innovative rent-to-own models
- site constraints
- proposed demolition or conversion of existing rental units

4. Planning Rationale

- How does the proposed development address the relevant housing policies and objectives of the Provincial Policy Statement 2014, Growth Plan 2019, Region of Peel Official Plan, Peel Housing and Homelessness Plan 2018-2028, Mississauga Official Plan, and Mississauga Housing Strategy?

5. Analysis and Opinion

- How does the housing proposal represent good planning and address the housing targets and objectives of the City of Mississauga and Region of Peel?

6. Summary and Conclusions

The submission should also identify the outcomes of any pre-application discussions with any civic officials and discussions held in the community.

Part B – Please complete the following table.

Include the full range of units provided, whether they are market units, or units forming part of the affordable middle income housing contribution. Where exact values / quantities are not yet known, please provide estimates. For a separate word document version of this table that can be pasted into your Housing Report, please click here: https://www7.mississauga.ca/documents/Business/Housing_Report_Table.docx

Proposed Development – Housing Breakdown (All Units)		
Purpose Built Rental Units *		
	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
Bachelor	Less than \$922/month rent	
	Between \$922 and \$1153/month rent	
	Between \$1153 and \$1383/month rent	
	Between \$1383 and \$1614/month rent	
	More than \$1614/month rent	
1 bedroom	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
	Less than \$1233/month rent	
	Between \$1233 and \$1541/month rent	
	Between \$1541 and \$1850/month rent	
	Between \$1850 and \$2158/month rent	
More than \$2158/month rent		
2 bedroom	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
	Less than \$1396/month rent	
	Between \$1396 and \$1745/month rent	
	Between \$1745 and \$2094/month rent	
	Between \$2094 and \$2443/month rent	
More than \$2443/month rent		
3+ bedroom	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
	Less than \$1590/month rent	
	Between \$1590 and \$1988/month rent	
	Between \$1988 and \$2385/month rent	
	Between \$2385 and \$2783/month rent	
More than \$2783/month rent		
Ownership Units		
Ownership Units to be Sold at Market Prices		Qty. of Units
Bachelor		
1 bedroom		
2 bedroom		
3+ bedroom		
Ownership Units to be Sold as Affordable		Qty. of Units
Bachelor	\$	
1 Bedroom	\$	
2 bedroom	\$	
3+ bedroom	\$	
Unit Transfer		
Ownership Units to be Dedicated to City/Region		Qty. of Units
Bachelor	\$	
1 Bedroom	\$	
2 bedroom	\$	
3+ bedroom	\$	

Secondary Suites		
Private Ownership Secondary Suites		Qty. of Units
Bachelor		
1 bedroom		
2 bedroom		
3+ bedroom		
Land		
Land Dedicated to City/Region	Market Value of Land Per Acre	Acres
	\$	
Financial Contribution to Affordable Housing Offsite		
	Amount	
	\$	

*Proposed rent ranges to be updated annually, following the release of CMHC's Annual Rental Market Survey every October.

APPENDIX II / *Housing Report Table*

Part B – Please complete the following table.

Include the full range of units provided, whether they are market units, or units forming part of the affordable middle income housing contribution. Where exact values / quantities are not yet known, please provide estimates. For a separate word document version of this table that can be pasted into your Housing Report, please click here: https://www7.mississauga.ca/documents/Business/Housing_Report_Table.docx

Proposed Development – Housing Breakdown (All Units)		
Purpose Built Rental Units *		
	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
Bachelor	Less than \$922/month rent	0
	Between \$922 and \$1153/month rent	0
	Between \$1153 and \$1383/month rent	0
	Between \$1383 and \$1614/month rent	0
	More than \$1614/month rent	0
	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
1 bedroom	Less than \$1233/month rent	0
	Between \$1233 and \$1541/month rent	0
	Between \$1541 and \$1850/month rent	0
	Between \$1850 and \$2158/month rent	0
	More than \$2158/month rent	0
	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
2 bedroom	Less than \$1396/month rent	0
	Between \$1396 and \$1745/month rent	0
	Between \$1745 and \$2094/month rent	0
	Between \$2094 and \$2443/month rent	0
	More than \$2443/month rent	0
	Proposed Rents in 2019 Dollars (excluding parking and utilities)	Qty. of Units
3+ bedroom	Less than \$1590/month rent	0
	Between \$1590 and \$1988/month rent	0
	Between \$1988 and \$2385/month rent	0
	Between \$2385 and \$2783/month rent	0
	More than \$2783/month rent	0
Ownership Units		
Ownership Units to be Sold at Market Prices		Qty. of Units
Bachelor		0
1 bedroom		397
2 bedroom		188
3+ bedroom		57
Ownership Units to be Sold as Affordable		Qty. of Units
Bachelor	Proposed Affordable Sale Price of Unit \$ 0	0
1 Bedroom	\$ 0	0
2 bedroom	\$ 0	0
3+ bedroom	\$ 0	0
Unit Transfer		
Ownership Units to be Dedicated to City/Region		Qty. of Units
Bachelor	Market Value of Unit \$ 0	0
1 Bedroom	\$ 0	0
2 bedroom	\$ 0	0
3+ bedroom	\$ 0	0

Secondary Suites		
Private Ownership Secondary Suites		Qty. of Units
Bachelor		0
1 bedroom		0
2 bedroom		0
3+ bedroom		0
Land		
Land Dedicated to City/Region	Market Value of Land Per Acre	Acres
	\$ 0	0
Financial Contribution to Affordable Housing Offsite		
	Amount	
	\$ 0	

*Proposed rent ranges to be updated annually, following the release of CMHC's Annual Rental Market Survey every October.