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February 28, 2019

Mr. Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street
c/o Business Management Division, 17th Floor
Toronto, ON M5G 2E5

Dear Mr. O'Hara:

**PROPOSED AMENDMENT 1 TO THE *GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE, 2017* (ERO # 013-4506)
SUBMISSION BY SLATE ASSET MANAGEMENT
RE: 2077-2105 ROYAL WINDSOR DRIVE, CITY OF MISSISSAUGA**

Posted Online (Environmental Registry Ontario)

We are planning consultants for Slate Asset Management (“Slate”), the owner of the properties municipally known as 2077, 2087, 2097, and 2105 Royal Windsor Drive in the City of Mississauga (collectively, the “Slate Sites”). On behalf of Slate, we have reviewed the Province’s proposals as they apply to the Slate Sites and submit the following comments for the Minister’s consideration.

Slate would welcome an opportunity to discuss these comments with the Minister’s office, and would be pleased to provide additional information related to the Slate Sites if it would assist in considering the requests made in this submission.

Request to be Removed from Provincially Significant Employment Zone

The Slate Sites and the lands located within the City-initiated “Clarkson Transit Station Area Study” should be removed from the proposed *Provincially Significant Employment Zone #17 - Oakville (Oakville East)*.

The Slate Sites are located within 500 metres of the Clarkson GO Station, the area around which is the subject of an ongoing City-initiated study called the Clarkson Transit Station Area Study (the “Clarkson Study”). The Clarkson Study is intended to “provide a planning framework to guide future development, ensuring it supports transit and contributes to the walkability of the area...” and will consider “the possibility of employment land conversions”. The study was initiated to bring the official plan into conformity with the Growth Plan policies requiring planning for intensification around major transit station areas (“MTSAs”) (Section 2.2.4).

Slate is supportive of the Province’s intent to allow the delineation of MTSAs in advance of a Municipal Comprehensive Review (“MCR”) as proposed under Section 2.2.4.5. However, under the proposed amendment to Section 2.2.5.12 of the Growth Plan, including the Slate Sites and the Clarkson Study area within the PSEZ boundary would preclude the ability of the City to convert them for more transit-supportive uses and densities, even if the Clarkson Study identifies such uses and densities for the site.

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Background

The Slate Sites comprise two abutting parcels located on the north side of Royal Windsor Drive and west side of Southdown Road in the City of Mississauga. The Sites are improved with four buildings which are tenanted with retail and service commercial uses.

Within the Mississauga Official Plan, the Slate Sites are located at the north edge of the Southdown *Employment Area* (Schedule 9) and have a general land use designation of *Mixed Use Area* (Schedule 10). The Slate Sites are also subject to the Southdown Local Area Plan, which maintains the *Mixed Use* designation. Within Schedule 2 of the Mississauga Official Plan - Intensification Areas, the Slate Sites are included within an MTSA *Intensification Area*.

In 2018, the City initiated the Clarkson Study to develop a plan for the area surrounding the Clarkson GO Station to foster a transit-supportive “complete community”. The Clarkson Study was initiated in response to the Province and Metrolinx’s commitment to create an electrified transit network, including on the Lakeshore West GO line serving the Clarkson GO Station, to provide 15 minute, all day two-way service.

The study area for the Clarkson Study is comprised of a wide variety of existing land uses, with only a small portion of employment lands located in the southwest, west of the Slate Sites. The final plan for the Clarkson Study strives to incorporate a wide range of uses and accommodate a minimum density of 150 people and jobs per hectare in conformity with Section 2.2.4.3.c of the Growth Plan, which identifies minimum targets for MTSA served by the GO Transit rail network.

Proposed Amendment 1 to the *Growth Plan for the Greater Golden Horseshoe, 2017* and Proposed Framework for Provincially Significant Employment Zones

Slate supports the Minister’s intention to create “a modernized employment area designation system that ensures lands used for employment are appropriately protected while unlocking land for residential development”. In that regard, where a proposed PSEZ site is also located within an MTSA, it is important to carefully consider whether that site should be included within the PSEZ boundary. We appreciate the Ministry’s specific request for feedback on sites that are the subject of such overlap.

In this case, given the facts outlined above regarding the City’s ongoing planning initiatives for the Clarkson GO Station and surrounding area, it is clear that the Slate Sites and the Clarkson Study area should be removed from the proposed PSEZ boundary.

We have reviewed the City’s staff report regarding the Ministry’s proposed amendments and concur with their comment to the Ministry that the Province consult further with municipalities regarding lands to be identified as PSEZ and the policy framework that would apply to them.

Yours very truly,



Scott Arbuckle, MCIP, RPP
Director, Office Lead
IBI Group

- c. G. Brook, Slate Asset Management
- R. Juknevičius, City of Mississauga