



October 7, 2022

Ministry of Municipal Affairs and Housing
Office of the Minister
777 Bat Street, 17th Floor
Toronto, ON, M7A 2J3

Attn: Honourable Steve Clark, Minister of Municipal Affairs and Housing

**Re: Kaneff Group Comments on New Peel Region Official Plan
Ministry Reference No. 21-OP-215276**

Dear Minister Clark,

On behalf of Kaneff Group, I am pleased to submit comments on the new Peel Region Official Plan that is currently under review by your office for a decision. We have significant concerns that local Major Transit Station Area (MTSA) policies put forth to the Region of Peel by the City of Mississauga fail to recognize the crucial role of MTSA's as Strategic Growth Areas. Through new MTSA policies, the City of Mississauga has established a maximum building height of 25 storeys or less for properties located within the Downtown Urban Growth Centre and along the Hurontario LRT Corridor. Our concern is that restrictive policies will prevent these Strategic Growth Areas from achieving the highest level of transit supportive growth and density complemented by the provision of purpose-built rental housing and affordable housing. Municipalities should be focused on leveraging infrastructure investment within MTSA's by planning for development that realizes the highest and best use of the land.

We are particularly concerned that the maximum building height restrictions will impede our ability to contribute much need purpose-built rental housing in Downtown Mississauga. A 25-storey building height maximum has been applied to our lands located at 2170 and 2211 Sherobee Road, both of which are located on the Hurontario LRT Corridor and directly opposite of the Trillium Health Partners Mississauga Hospital. In our opinion, this is a missed opportunity to realize the highest and best use of our land for potential mixed-use intensification that is oriented towards higher order transit and capable of supporting the hospital.

The new Peel Region Official Plan and local MTSA policies also fail to consider the provision of alternative development standards to support development within MTSA's. Consideration for reduced parking standards and built form standards particularly for purpose-built rental housing within MTSA's would incentive investment, expedite the delivery of much needed rental housing, and create opportunity amidst this housing crisis.

If approved by the Region of Peel, the lower-tier MTSA policies cannot be appealed or amended. The local MTSA policies would essentially eradicate a Planning Act process that has been used





successfully for decades to amend the Official Plan on a site-specific basis to realize the highest and best use.

Thank you for taking the time to review our concerns. We hope that our perspective provides insight on your decision-making process. We appreciate the opportunity to provide comments on the new Peel Region Official Plan and we look forward to your decision.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Freeman', with a long, sweeping horizontal line extending to the right.

Kevin Freeman, MCIP, RPP

*Director of Planning & Development
Kaneff Group*

*On behalf of the Kaneff Leadership Team

