



October 23, 2020

Our File: 815-008

City of Mississauga  
300 City Centre Drive  
Mississauga, ON L5B 3C1

Attention: Catherine Parsons, MCIP RPP  
Planner, Planning Innovation, City Planning Strategies Division

**Re: Housing Report Comments Response Letter  
In support of the proposed Zoning By-law Amendment and Draft Plan  
of Subdivision Applications (City Files: OZ 20/004 and T-M20001 W6)  
1240 Britannia Road West  
City of Mississauga**

---

We are pleased to provide the following Response Letter to staff comments received on the Housing Report, dated March 25, 2020 enclosed with the first submission for the above noted applications. This Response Letter should be considered in conjunction with the Housing Report originally submitted which provides a detailed review of applicable policy.

The proposed development has been refined in response to the first cycle of staff comments. The updated development concept consists of a total of 106 residential dwellings (an overall reduction of 3 units) including 45 dual frontage townhouse dwellings and 61 standard townhouse dwellings. Dual frontage townhouses are to be located along Britannia Road West and Galesway Boulevard. A total of 6 secondary suites continue to be proposed within the end units of the dual frontage townhouse blocks facing Britannia Road West (now identified as Lots 18, 25, 26, 31, 32 and 39).

According to Zoning by-law 0225-2007, a “Second Unit” is defined as an accessory dwelling unit with its own kitchen, sanitary facilities and bedroom(s)/sleeping area. The proposed secondary suites are provided with two separate accesses, bedroom, kitchen/live space, bathroom and one parking spot. The design of the proposed secondary suites conforms to all of the provisions for Second Units contained in Section 4.1.20 of the Zoning By-law.



**Response to Staff Comments, dated June 23, 2020**

**Comment #1** We appreciate staff’s recognition that the proposed secondary suites are an appropriate form of affordable housing that contributes to diverse housing options in Mississauga. Secondary suites are an important component of the informal affordable rental stock and offers flexibility in the use of housing to meet diverse needs.

**Comment #2, #3 & #5** It is important to reiterate that as per the definition of a “Second Unit” in the Zoning By-law, the function for rental income is not a defining characteristic or a requirement. Nevertheless, second units are identified in the *Making Room for the Middle: A Housing Strategy for Mississauga (October 2017)* report as an important component of the affordable housing market and in promoting diverse housing options. Secondary suites play a role in filling gaps in providing for diverse housing needs and offer benefits that are not always easily quantifiable. The secondary suite may be used for rental income to offset the cost of home ownership and render it affordable, in which case rents are established by the owner of the primary dwelling (as is typical of the informal rental market). Secondary suites also offer flexibility to better accommodate changing housing needs of a household over the long term. Over the “lifespan” of the secondary suite, it may at times be used for rental income and at other times be used to support members of the primary household or extended family.

For example, the secondary suite may be used in one way or another to support changing housing needs of the primary occupant(s) where affordable housing alternatives in the broader community are not available. Scenarios of this nature are diverse but could include accommodating a live-in nanny or live-in full-time nurse or accommodating a family member experiencing housing challenges due to stage of life or other circumstances. This could include young adults who cannot yet afford to live independently, aging relatives, those experiencing difficult life-transitions or in another capacity are fully or partially dependent.

In any of these scenarios, monetary rent may or may not be paid to the principal unit owner but can still fill in a need for the primary owner and secondary suite occupant by avoiding costly alternatives. Paying full or subsidized rent for full-time professional care, to support young adults living away from home or assisted living facilities in addition to the cost of home ownership may not be affordable or desirable.

The primary opportunity for the proposed secondary suites is in their inherent flexibility to accommodate evolving housing needs, support household resilience, and the option for rental income. It is difficult to quantify the full



monetary value of a secondary suite through a single developmental application as it is not possible to predict how the future purchaser will decide to use the suite. It is also premature to assume the sale price for a completed unit at this stage. National Homes will advise purchasers that the proposed secondary suites are required to be registered with the City's Secondary Unit Registry to ensure that the secondary units operate legally.

**Comment #4** The Mississauga Zoning Bylaw 0225-2007 requires 1 parking space per secondary suite. The proposed development complies with this requirement by provided double-wide driveways to the units containing a secondary suite.

**Comment #6 & #7** The proposed development conforms to the provisions of Section 4.1.20 of the Zoning By-law regarding secondary suites. It should also be noted that the proposed secondary suites have been designed in consideration for the applicable OBC standards.

Comment #6 and #7 refer to the need to address design comments as they relate to the secondary suites. This includes the following comment provided by Urban Design staff that is directly related to the secondary suites:

*"2ND. UNIT ACCESS:*

- 1) The development is proposing 6 secondary units. If the parking for these units are located on the condo street and the front entrance is accessed from Britannia Rd - how does one get access through a 2.5m building separation without a walkway. The building separation distance should be increased to 4.5m and include a 1.5m walkway.*
- 2) This design revision may result in the loss of one unit in Block#4.*
- 3) The stairs of unit# 17, 24, 25, 30, 31 and 38 are in close proximity to their parking spaces. An excessive grade differential (more than 2 stairs) would mean stairs would infringe into the parking space. Push back the porch feature/entrance to accommodate more space for the stairs"*

Two independent accesses are provided for the secondary suites including one direct entrance from a porch fronting Britannia Road, and another entrance via a shared foyer accessible from the parking spaces. The common foyer on the lower floor (ground floor) provides separate access for both the second and primary unit occupants without any need for occupants of one unit to trespass through the other. Please refer to the Floor Plans enclosed with the resubmission. This configuration is appropriate as it ensures a connection from the proposed condominium road and parking space to the secondary suite without the need to pass through the proposed 2.5 metre building separation



area. A walkway between the proposed condominium road and Britannia Road east of the proposed Cabrera Crescent cul-de-sac continues to be proposed that will facilitate a north-south pedestrian connection.

The stairs and porch for the exterior units (now identified as Lots 18, 25, 26, 31, 32 and 39) are recessed and therefore do not encroach into the secondary suite parking space.

Although there are other urban design comments which are addressed in a separate Comment Response Table, the other comments regarding the dual-frontage townhouses along Britannia Road West are not associated with the inclusion or exclusion of the secondary suites and should be addressed separately. As such, it is our opinion that inclusion of the proposed secondary suites as currently shown does not present substandard conditions.

We trust this response has provided sufficient commentary to the comments received. Please feel free to contact the undersigned if you have any questions or concerns.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Colin Chung, MCIP RPP  
Partner

Arleigh Hack, MCIP RPP  
Planner

Appendix I Housing Report Staff Comments Letter, dated June 23, 2020

**APPENDIX I**

Housing Report Staff Comments Letter, dated June 23, 2020

City of Mississauga  
**Memorandum**



---

Date: 2020/06/23

To: Tori Stockwell, Planner, Development Central

From: Catherine Parsons, Planner, City Planning Strategies

Subject: **Revised Housing Comments – OZ 20/004 and T-M20001 W6  
Proposed Zoning By-law Amendment and Plan of Subdivision  
Part of Lot 5, Concession 3, West of Hurontario Street, and All of Lots 60 to 69  
Both Inclusive, and All of Blocks 70 and 71 and All of Block 75 (0.30 Reserve)  
and Cabrera Crescent, Registered Plan 43M-1563  
1240-1310 Britannia Road West, 0 Cabrera Cres., 5939-5989 Cabrera Cres. and  
1295 Galesway Blvd.  
South side of Britannia Road West, east of Whitehorn Avenue  
National Homes (1240 Britannia) Inc. and Mattamy (Country Club) Limited**

---

**Purpose**

The purpose of this Memorandum is to outline how the proposed development meets Provincial, Regional, and local housing objectives. This Memorandum has been prepared in response to the Housing Report (March 2020) prepared by Glenn Schnarr & Associates on behalf of National Homes (1240 Britannia) Inc. in support of the above-noted file.

**Application Summary**

The applicant is proposing a development of 109 units including 1 detached dwelling, 48 dual frontage townhouse dwellings, and 60 standard townhouse dwellings. Six of the dual frontage townhomes located along Britannia Road West are proposed to contain a secondary suite, for a total of 6 secondary suites. The secondary suites are proposed to meet the affordable housing component of the proposed development.

**Mississauga Staff Comments**

The City is seeking to ensure that large developments represent good planning by providing a mix of tenure, unit type, and affordability options for residents. This objective is supported by provincial, regional, and local housing policies.

**Provincial Policy Framework**

The Provincial policy framework, through the policies of The Growth Plan for the Greater Golden Horseshoe, 2019 ("Growth Plan") and the Provincial Policy Statement, 2020 ("PPS") provide a framework for the consideration of how new development will contribute to a diverse housing stock. The Provincial planning framework supports the achievement of complete communities by directing municipalities to develop in a way that accommodates a full range of housing options, including second units and affordable housing.

Policy 1.1.1 of the PPS speaks to the need to accommodate a variety of residential types, including second units. Policy 2.2.6 of the Growth Plan (in conjunction with Policy 1.4.3 of the

PPS), directs municipalities to plan for and accommodate a full range and mix of housing options. A key requirement is the establishment of housing targets, including targets for affordable ownership and affordable rental housing.

### Regional Policy Framework

The Region of Peel's Housing and Homelessness Plan, 2018 ("PHHP") established annual affordable housing unit targets for the Region and local municipalities (please see Table 1). These targets are based on the housing supply and demand analysis completed through the Region's Housing Strategy (2018), and are reflective of housing need across the city and region. In accordance with Growth Plan Policy 2.2.6 and PPS Policy 1.4.3, these targets will be implemented through the upcoming Peel 2041: Regional Official Plan Review.

In addition to annual housing unit targets, PHHP established roles for various sectors. The private sector development community will play an important role in the provision of housing that is affordable to low and middle income households.

**Table 1 – Peel Housing and Homelessness Plan Annual Housing Unit Targets for Mississauga**

<b>Segment</b>	<b>Emergency / Temporary / Transitional Housing</b>	<b>Supportive</b>	<b>Low Income (Deciles 1-3)</b>	<b>Middle Income (Deciles 4-6)</b>	<b>Middle Income and Greater</b>
<b>Provider</b>	Public, Nonprofit Sector	Public, Nonprofit Sector	Public, Nonprofit, Private Sector	Nonprofit, Private Sector	Private Sector
<b>Approx. Percentage of Total New Units per Year in Mississauga</b>	0.3%	2.6%	10.2%	13.3%	73.4%

### Mississauga Policy Framework

Mississauga's housing policy framework further supports the provision of a range of housing options. Chapter 7 – Complete Communities of Mississauga Official Plan outlines the following policies:

"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 choices in terms of type, tenure and price;
- b. the production of a variety of affordable dwelling types for both the ownership and rental markets; and
- c. the production of housing for those with special needs, such as housing for the elderly and shelters.

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.

7.2.5 The onus will be placed on the applicant/developer to address Provincial and Regional housing requirements."

These policies provide clear direction that both the City and the development community play a critical role in fulfilling the objectives of the housing policy framework.

Mississauga's Housing Strategy (2017) – *Making Room for the Middle*, outlines the need for the City to focus their attention on addressing housing affordability for middle income households. Middle income households in Mississauga struggle to afford market rental and ownership housing in Mississauga, but do not qualify for subsidies that are geared toward low income households.

### Housing Report

To operationalize the above-noted policies, the City has implemented a Housing Report Terms of Reference ("TOR"). The TOR provides a framework for how the private sector development community will contribute to the achievement of housing targets, and ultimately housing diversity and complete communities.

The City is requesting that large developments of 50 or more ownership units incorporate a minimum of 10% of units as middle income affordable units. The first 50 units of a building are not included in the calculation. Applicants proposing rental tenure will not be subject to this request. Based on the current proposal, the City requests that a minimum of 6 units be sold at a maximum purchase price of \$420,000 or rented at an affordable rate.

The Housing Report submission proposes that the 6 second units will serve as the affordable housing contribution for this development. While the Housing Report did provide market information, insufficient information respecting the affordability of the proposed development was provided.

Staff offer the following commentary and seek clarity on the following questions:

- Staff are generally supportive of the provision of second units within the proposed development. Second units are an important part of the affordable rental housing stock and will contribute to the diversity of housing options in Mississauga.
- The Housing Report does not indicate how the proposed affordable units will be kept affordable. What are the proposed rents and how will the applicant ensure these units are rented at the affordable rent?
- The Housing Report does not indicate if the cost of including second units in the principal dwelling will be passed onto the buyer of the principal dwelling. What will the price of the principal dwelling be, and how does that compare to units that do not contain second units?
- What is the parking ratio for the second units?



- The City will seek commitment from the applicant that the proposed second units will be registered with the City's Second Unit Registry.
- The provision of second units is not justification for substandard conditions and design principles such as sufficient setbacks.
- Pending resolution of the concerns regarding affordability of the principal dwellings, affordability of the proposed second units, and substandard setback conditions, staff would like to explore the opportunity to include more second units within the proposed development.

In summary, staff are supportive of second units within the proposed development as a valuable contribution to the range of housing options in Mississauga. The City is committed to an open dialogue with the applicant to ensure that concerns of all parties are addressed.

Please contact Catherine Parsons at the contact information noted below for more information.

Sincerely,

Catherine Parsons, MCIP, RPP  
Planner, Planning Innovation, City Planning Strategies Division  
Planning and Building Department  
T 905-615-3200 ext. 8409  
[catherine.parsons@mississauga.ca](mailto:catherine.parsons@mississauga.ca)

Cc: Paulina Mikicich, Manager, Planning Innovation, City Planning Strategies