

July 4, 2022

Regional Chair Nando Iannicca and Members of Region of Peel Council  
Region of Peel  
10 Peel Centre Drive  
Brampton, Ontario  
L6T 4B9

**Peter Gross**  
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Dear Mesdames and Sirs:

**Re: Ahmed Group  
1000 & 1024 Dundas Street East, Mississauga  
Region of Peel New Official Plan**

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We are counsel to Ahmed Group (1000 Dundas St. E.) Inc. and Ahmed Group (1024 Dundas St. E.) Inc. (together the “**Ahmed Group**”). The Ahmed Group owns the lands known municipally as 1000 and 1024 Dundas Street East, in the City of Mississauga (the “**Subject Lands**”). As Council is aware, our client has plans to redevelop the Subject Lands with 462 purpose-built rental apartment units (the “**Redevelopment**”) which is opposed by Mother Parker’s.

We previously made written and oral submissions to Council with respect to our client’s Redevelopment in the context of the employment designations set out in Schedule E-4 of the New Region of Peel Official Plan (the “**New ROP**”) to which Mother Parker’s objects.

We have reviewed Mother Parker’s Tea & Coffee Inc.’s (herein “**Mother Parker’s**”) submission dated June 17, 2022 that was in response to our submission dated June 9, 2022. We disagree with a number of assertions in Mother Parker’s June 17 letter and provide the following new and/or additional information:

1. First, Mother Parker’s suggests that a number of sensitive receptors on Greta Gate, Mississauga are subject to higher noise level limits because they abut Dundas Street East and therefore are not experiencing higher noise levels than permitted under NPC-300. However, according to the noise contours submitted by Mother Parker’s in their letter, it is clear that several sensitive receptors are beyond the boundary of the area subject to higher noise limits and with respect to those receptors, **Mother Parker’s is out of compliance.**
2. Second, Mother Parker’s suggestion that the Class 4 designation is only intended for extraordinary situations is patently incorrect. In fact, Class 4 is a tool provided by the Ministry to accommodate intensification where compliance would otherwise be impossible, including in at least two prior instances, within the City of Mississauga. The situation in this case is precisely what Class 4 is intended to address.
3. Third, Mother Parker’s suggests that Ahmed Group’s primary argument for approval is that Mother Parker’s might leave the area. In fact, our client has consistently taken the

position that the Redevelopment and Mother Parker's can co-exist under a Class 4 designation and has tried to engage Mother Parker's on a number of occasions to discuss how the uses could be made compatible.

4. Finally, we attach a Land Use Compatibility Study prepared by Rowan Williams Davies & Irwin Inc., land use compatibility engineers and experts who confirm compatibility of the Redevelopment with Mother Parker's operations, provided that a Class 4 designation applies to the lands in question.

In reviewing the Staff Report titled Delegation from Mother Parker's Tea and Coffee Inc. (Referred Motion), it is clear that staff do not support modifying the New Official Plan to designate the Subject Property as being within *Employment Areas*. As staff clearly articulate in the report, the current designation of the Subject Property is appropriate and implements the findings of the Dundas Connects Master Plan which contemplates the possibility of sensitive uses being introduced on the Subject Property.

In this regard, we urge Regional Council to follow the staff recommendation and not seek modifications to the adopted New Regional Plan.

Sincerely,

Gowling WLG (Canada) LLP



Peter Gross