



**Date:** May 12, 2024

**Subject:** Response to the Updated Provincial Policy Statement

**From:** Mattamy Homes Canada

### **About Mattamy Homes:**

Mattamy Homes has a long and proud history in the homebuilding sector. Founded in 1978, we are Canada's largest residential real estate developer, building master-planned communities and homes of every type, including single detached, townhomes, mid-rise and high-rise units. In Canada, our communities stretch across the Greater Golden Horseshoe Area, as well as in Ottawa, Calgary and Edmonton. Each year, Mattamy helps more than 4,000 families across Canada realize their dream of home ownership.

Mattamy Homes Canada supports the Government of Ontario's ambitious plan of building 1.5 million new homes by 2031. We believe it is going to take all of us – the private sector, municipalities, and provincial and federal levels of government - working together to ensure the dream of homeownership stays within reach of all Ontarians, including those of generations to come.

### **Comments and Recommendations:**

While we are generally supportive of the proposed updated Provincial Policy Statement, we would like to share some specific recommendations that will ultimately help support the supply of more housing in Ontario.

1. Include a **housing-first policy goal**, clarifying that the provision of housing through the efficient use of land is essential and a priority when considering competing policy objections of the statement. Policies related to Natural Heritage protection should reflect the competing priorities within settlement areas. The policy document should establish an urban lens for natural heritage protection in settlement areas.
2. Allow a **no-net-negative impact** approach to protecting significant environmental features and natural heritage systems, permitting the removal of features in settlement areas where they can be replaced/offset either on or off-site with a better ecological outcome.
  - This change should be made to section 4.1.5 and 4.1.8, and the definition of Negative impacts. The definition tile should be changed to Net negative impacts and the term Negative impacts in a) should be refined to be Net negative impacts.
  - This recommended change to the natural heritage policies would introduce some much-needed flexibility. That flexibility will allow industry to build both more homes and more habitat faster, accelerating the creation of viable, sustainable natural heritage systems.

3. Policy 5.2 should have an added policy that requires the preparation of up-to-date **flood plain** mapping and that within areas that are designated and available for development should use planned land uses as a basis for modeling the flood plain.
4. Specify that the **‘use-it or loose-it’** approach to servicing allocation does not apply when developers have front-financed servicing infrastructure.
5. Direct that municipalities be the approval authority for **minor official plan amendments** in instances where upper-tier municipalities have had their planning responsibilities removed.
6. Include a policy that requires **utilities to plan for the provision of services** in keeping with the growth projections and phasing within municipal official plans.
7. Add municipalities that are projected to soon be fast-growing to the list of large and fast-growing municipalities (East Gwillimbury, Innisfil, Kawartha Lakes, New Tecumseth, Whitchurch Stouffville, etc.) and issue **housing forecasts** for these municipalities.
8. Policy 2.3.1.4 should be revised to permit grade-related intensification as-of-right within ‘built-up areas’ within settlement areas. A definition of **“Built-up Areas”** should be included in the PPS defining these as *“man-made land cover features, ranging from small hamlets at rural crossroads to large cities, as identified in Provincial Mapping.”* The province should provide and routinely update its mapping of Built-Up Area, which are currently available on Land Information Ontario.
9. We strongly support the new requirement that municipalities must make decisions that are **consistent with the Policy Statement contained** in 6.1.7, and request that words ‘or zoning bylaws’ be added after ‘official plan.’
10. The planning horizon in policy 2.1 should require that sufficient land be made available for a **minimum of 30 years**, and the policy should require that all lands be designated and available as early in the planning horizon as possible to achieve growth forecasts and **no later than 10 years** from the establishment of growth forecasts in an official plan.
11. Policy 2.1.4 should require a **market-based forecasted supply of housing**, including a mix of housing options, and that planning authorities shall maintain a sufficient supply of each forecasted housing type within the required periods.
12. Policy **2.1.3 should be revised** to require planning for infrastructure, public service facilities, strategic growth areas, and employment areas for large or fast-growing municipalities to be done to a 50-year time-horizon.
13. The definition of **strategic growth areas** should include long-term growth areas to meet growth needs beyond the planning horizon of the official plan.
14. Policy **2.1.4 a)** should be revised to specify 20 years and **2.1.4 b)** should be revised to specify five years.
15. We strongly support the removal of comprehensive review from the PPS and the ability of planning authorities to make decisions on **settlement and employment areas** at

any time. Like changes to the Planning Act regarding settlement areas, appeals of removal of lands from employment areas should be permitted.

16. Policy 4.3.4.1 should be revised to include the ability to remove lands from **prime agricultural areas** by identifying them as **Rural Areas**, and policy 2.5 should require that municipalities identify Rural Areas when updating their Official Plans.

- The PPS should also require that municipalities identify areas abutting settlement areas as Rural Areas to provide an appropriate transition between settlement and prime agricultural areas. The definition of **Rural Areas** should be revised to replace the reference to ‘prime agricultural areas’ with ‘prime agricultural lands’ to clarify that Prime Agricultural and Rural Areas are mutually exclusive.

17. Policy 2.3.2.1 e) should be revised to state that **new or expanded areas** are not required to comply with minimum distance separation formulae.

***For further information:***

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