

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
13<sup>th</sup> Floor, 777 Bay St.  
Toronto, ON M7A 2J3

via email: [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)

**Attention: Hon. Paul Calandra**

**Re: ERO 019-8462  
Comments on Behalf of Minto Communities Canada**

Dear Minister Calandra:

Thank you for the opportunity to comment on the Government of Ontario's proposed Provincial Planning Statement.

Minto is a leading Ontario-based builder, developer, and investment manager whose history in Ontario spans more than 65 years. We proudly build across North America, employing almost 1,400 people across Canada and the southern United States of America.

Minto has built nearly 100,000 homes, including 65,000 homes built in the Ottawa, Calgary, and Greater Toronto Areas. We manage more than 14,600 rental units and carry 2.4 million square feet of commercial space.

We build and manage rental units. We also build condos and houses that meet the different needs of Ontario's people and families.

We applaud Ontario's firm commitment and actions focusing on working with industry leaders to get more homes built faster.

With great support for your objectives, we respectfully offer our comments, thoughts, and concerns in response to your government's consultation on the Province's Provincial Planning Statement.

Sincerely,

Brent Strachan

President, Ontario

Minto Communities - Canada

Minto generally agrees with the province's policy direction of the new Provincial Planning Statement which eliminates unnecessary duplication of policy from the former PPS and Growth Plan. Many of the policies of the former Growth Plan were restrictive in terms of meeting its own growth targets.

Rather than repeating the comments we submitted in the consultation on the PPS last year, we wanted to highlight one issue that we believe would increase land supply in a material way and, therefore, help with housing supply and affordability.

The City of Ottawa has a policy (Official Plan policy 9.1.1 3) that allows the City to decide unilaterally if they would accept an Official Plan Amendment on lands currently designated Agricultural Resource Areas if they are less than 250 hectares. The City has blocked several landowners from even submitting an OPA with agricultural evaluations demonstrating the land should not be designated Agricultural Resource.

This has resulted in smaller pieces of land, often surrounded by development on three sides and with minimal agricultural value, remaining out of the urban boundary when a review would likely result in them being added. These parcels of land are close to infrastructure and should be considered.

We understand that similar issues are occurring in other municipalities, resulting in land that would otherwise be considered appropriate for development remaining excluded.

We would therefore propose the following language for a new clause in section 2.3.2 of the proposed PPS 2024:

*3. Planning authorities should consider opportunities to round out the boundaries of existing settlement areas where that would make efficient use of existing or planned infrastructure and should not establish a minimum area of land required to consider for a settlement area boundary expansion.*

This would allow applications to be made, and then councils can ultimately decide on their merits.