



December 30, 2022

The Honourable Minister Steve Clark  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th Floor  
Toronto, Ontario M5G 2E5

Dear Minister Clark,

**Re: Submission for ERO number 019-6177 – Review of A Place to Grow and Provincial Policy Statement**

Thank- you for the opportunity to comment on your housing-focused policy review for A Place to Grow and the Provincial Policy Statement. We understand the importance of these two documents for providing planning policy direction to municipalities so that they may approve housing faster. At the same time, more clear policy direction that implements Provincial mandates is always welcomed by the building industry as we collectively contribute to solving the housing supply shortage.

Mattamy Homes is an industry leader recognized across North America as a well-managed company that leads the industry in home construction. Housing supply is our core business, and it is for that reason we have spent significant time, using our extensive experience and knowledge, reflecting on the proposal details contained in the ERO posting.

To assist in communicating our comments, we have structured this submission in the same manner as the questions posed in the ERO posting. Each section/subsection under each question provides a summary of our comments with additional details listed below.

## **Question 1. What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?**

The following core elements were considered:

### Residential Land Supply

#### **Settlement Boundary Expansions:**

Sufficient land for housing supply is a fundamental piece for ensuring that houses get built. Past processes for expanding settlement boundaries have taken too long and have resulted in many of the housing supply challenges being faced today. By focussing on desired outcomes, settlement boundaries should be increased through standardized and simpler processes that continue to rely on minimum density and intensification targets, high-quality built form, market demand and the idea that increased supply (beyond the minimum required for population and employment forecasts) has the ability to reduce developable land values through increased competition. When setting density and intensification targets the local context and characteristics should be the key consideration to ensure a balanced supply of housing forms is provided. More specifically:

- a) The focus should be more on built form and densities and less on restricting growth due to restrictions based on population and employment forecasts.
- b) The policies should continue to require minimum intensification targets to be met and minimum greenfield density targets to be met based on the characteristics and maturity of a community, together with existing/planned services. Targets should be aggressive but achievable without drastically changing the existing community.
- c) The population and employment forecasts and land needs studies undertaken for a settlement expansion should be simplified and less onerous with forecasts taking into account market demand, federal immigration policies and expected housing preferences of the future populations while still meeting greenfield density targets.
- d) The forecasts should not be based solely on past trends of housing absorption or housing types but rather based on the anticipated housing absorption and housing needs for future populations. This methodology should also be based on the premise of not just meeting the population and employment forecasts but ensuring a competitive supply of housing options and employment lands. The existing focus on forecasting has had an impact of delaying the accessibility of new lands as population growth in the GGH has accelerated past those projections.

- e) Standardized policies for settlement boundary expansions could prioritize and expedite expansions that more effectively deliver on provincial mandates and/or local growth preferences (e.g., employment lands, strategic growth area, transit supportive growth, affordable housing, greenhouse gas reduction targets, etc.). These policies could be augmented with expedited servicing approval and planning approvals for more rapid implementation of housing supply.
- f) Density targets should also be maintained and increased, where appropriate, for Urban Growth Centres and Major Transit Station Areas, as well as other Strategic Growth Areas.
- g) Settlement boundary expansion needs to be coordinated with infrastructure planning, but the study process should not require extensive infrastructure studies, such as Master servicing plans, prior to determining settlement expansion directions. Rather high-level infrastructure capacity and servicing options should be considered in evaluating settlement expansion options with detailed master servicing plans completed once a preferred settlement expansion option is completed.
- h) Municipalities should target and invest in municipal service expansions and enhanced transit facilities to areas that maintain and achieve desired growth outcomes.
- i) Opportunities should be made available for settlement boundary expansions that “round-out” communities in logical locations where natural features or man-made separations exist. Future policies could guide municipalities in considering additional lands in proximity to existing communities where logical physical boundaries such as adjacent waterways, highways, etc. practically form a future built boundary. Policies could also focus on existing development areas where infrastructure and services already exist rather than adding larger areas that require more significant infrastructure servicing.
- j) Settlement Area Boundary expansions should also target lands in partially serviced areas in proximity to serviced areas as logical expansion of the settlement areas and opportunities to increase the density of housing in proximity to existing services.

### **Employment Area Conversions:**

Planning for market demand is incredibly complicated. Increased flexibility when planning for employment and residential uses, particularly in fast-growing communities with changing employment trends (e.g., pre vs post covid), would assist municipalities in

maintaining local employment/resident employment ratios to serve local needs. More specifically:

- a) The criteria for conversion should distinguish between types of employment uses and reflect the priority of protection for those lands that need protection. For example, heavy industrial lands require a different level of protection from that of office buildings or hotels. Heavy industrial sites typically require a large footprint and access to certain types of infrastructure (commercial rail facilities as an example). Heavy industrial sites also typically require generous separation distances from sensitive land uses. These factors combine to justify a more stringent set of conversion requirements than other employment uses.
- b) Office, hotel, retail, places of worship and many creative industrial uses, while still employment uses, do not require the same sort of employment "conversion" protections. Such uses are not only compatible with residential uses, but in fact benefit from being in the same areas as residential uses in order to generate a desirable mixed-use condition. Furthermore, unlike heavy industry, which can require large swaths of land, these uses can thrive in a vertical orientation. For example, where there is demand for more office space in a downtown, significant amounts of such space can be accommodated on a single urban development site.
- c) As such, the policy approach for conversion of these types of areas should be simplified and taken out of the MCR process. Privately initiated applications to convert employment lands to other land uses (residential, institutional, etc.) should be permitted. Municipalities would retain the ability to review and approved these applications, including the imposition of certain employment floor area targets, if appropriate. Criteria for conversion could include consideration of sites that mix employment and residential concepts for flexible spaces.
- d) These policies would still respect population/employment ratios for complete communities, although such ratios should be guidelines and incorporate a level of flexibility, as the increasing popularity of work from home and hybrid work arrangements need to be accounted for and recognized.

### Attainable Housing Supply and Mix

#### **Housing Mix:**

The right housing mix has a direct and positive effect on achieving housing forms that serve a variety of socio-economic needs. Increased density and intensification targets need to consider a fulsome range of housing types and local needs. More specifically:

- a) An appropriate range and mix of housing options should focus on housing types rather than number of bedrooms (e.g., a three bedroom unit in a condominium is not the same as a three bedroom unit in a single or semi-detached unit). Form and function should be the main consideration to ensure the appropriate type of housing is provided for a variety of family formations.
- b) With respect to the missing middle, there are proven alternatives to achieving significant densities through lower building heights and more human-scaled built form that reinforces neighbourhoods and 15 minute communities. The Province has an opportunity to promote better urban design and its associated social, health and transit benefits.
- c) An appropriate housing mix will need to consider the context of achieving minimum intensification targets and minimum designated greenfield targets. However, intensification targets in a municipality should not be placed so high that it negates the opportunity to provide for a mix of housing types including ground-related housing, except in fully built-out communities where few opportunities remain for ground-related housing.
- d) Balancing housing mix with density and intensification targets can be done with policies ensuring land supply for the full range of ground-related, missing middle and mid-to high-density housing, and requiring timely infrastructure to accommodate both intensification and greenfield development.
- e) We agree that a full range of housing should focus on ground-related (not just singles and semis), missing middle and mid- to high-density housing. A standard definition of “missing middle” is important to differentiate from other housing forms and plan for this housing.
- f) Appropriate densities within Greenfield and within Strategic Growth Areas should be based on context, infrastructure, transit, services and need for the various housing typologies.

### **Major Transit Station Areas (MTSAs):**

Realizing the full potential of MTSAs is critical for maximizing the return on infrastructure investment and achieving built forms and resilient neighbourhoods that are ultimately more sustainable. More specifically:

- a) Effective outcomes will benefit from policy direction that requires minimum density targets and is implemented through as-of-right zoning that reflects the heights and densities permitted in the Official Plan or through a CPPS by-law.

- b) Municipalities should have required timeframes to put in place as-of-right zoning by-laws and provide confirmation to the Province. Implementation of an audit process to ensure minimum targets are not being used as maximums through Official Plan amendments and as-of-right zoning by-laws would be recommended.
- c) Future policy should make clear that density minimums shall not be used as caps.
- d) When reviewing privately initiated OPAs or ZBLAs for greater height and density, especially in proximity to transit facilities (including Transit Priority Corridors), municipalities should have regard to existing infrastructure spending and future investments. This consideration could be specifically referenced in Staff Reports and Committee and Council decisions.

### **Urban Growth Centres:**

Urban Growth Centres represent the preferred location of development that can leverage existing infrastructure, centralize community facilities, and provide intensification. Aspirational density targets should continue to reinforce the role of these centres for growth. More specifically:

- a) Focusing growth in Urban Growth Centres, as set out in the Growth Plan, is good planning policy. Focussed growth in these areas will allow large and fast-growing municipalities to have a greater mix of uses and transit service coverage. Similarly, policy should establish strong criteria to discourage the weakening/removal of Urban Growth Centres.
- b) The existing Urban Growth Centres as set out in the Growth Plan should remain while others downtown areas in large and fast-growing municipalities in the Province should be identified and supported.
- c) The minimum density targets for Urban Growth Centres should be based on the future market and built-form characteristics of each municipality. The requirement for achieving the minimum density target by 2031 should be changed to 2051.
- d) Policy should be introduced that prevents municipalities from unduly burdening new housing development with what are in effect subsidies for non-housing related development. For example, policies that artificially require "replacement" of some non-residential uses, or the initial construction of non-residential uses, on sites that have no demand for such uses result in either delayed residential construction as the residential housing has to wait for the non-residential demand to catch up, or results in increased costs to residential development because the residential housing has to subsidize the non-residential uses that are not then in

demand. Instead of looking to every site to solve all challenges, policies should focus on the overall vibrancy of a given mixed use area.

## Growth Management

### **Population and Employment Forecasts:**

Similar to comments above regarding settlement boundary expansion, the use of population and employment forecasts need to be simplified to encourage existing anticipated trends while encouraging a competitive supply of housing to reduce land costs for future homes. More specifically:

- a) If population and employment forecasts are to be relied upon, it would assist developers and local municipalities if they were completed on a more frequent basis and consider the broader provincial outlook.
- b) It would also assist if the Province made available long-term provincial growth data to assist developers and local municipalities in their forecasts, particularly for infrastructure planning and its longer planning horizons.
- c) The population and employment forecasts and land needs studies undertaken for a settlement expansion should be simplified and less onerous. Forecasts should consider market demand, immigration policies and expected housing preferences of the future populations while still meeting greenfield density targets.
- d) The forecasts should not be based solely on past trends of housing absorption or housing types in the municipality, but rather the anticipated housing absorption and housing type needs for future populations.
- e) The forecast methodology should also be based on the premise of not just meeting the population and employment forecasts but ensuring a competitive supply of housing options and employment lands.
- f) Currently, population and employment forecasts are often used to hold back residential development. For example, employment forecasts are used to hold back residential development in older "employment areas" that have already transitioned away from heavy industry, or population forecasts are used to justify refusing new housing development approvals that are otherwise good planning, but a municipality will claim is not needed as it has met its "target" (even though the very fact that there is an application for this new housing is evidence of the demand for such new housing). Policies should be developed to discourage this practice as the end result is yet another limitation on getting housing built.
- g) The focus should be more on built form and densities and less on restricting growth due to restrictions based on population and employment forecasting.



**Intensification:**

Solving the Province's housing shortage will require both increased land supply for greenfield development, together with effective intensification policies to maximize growth in strategic growth areas containing major transit infrastructure. More specifically:

- a) Reduce the focus for intensification within delineated built boundary and rather focus on intensification within the strategic growth areas.
- b) The delineated built boundary mapping from the early Growth Plan policies is outdated and flawed. It should be scrapped and rely on local identification of built-up areas to be the focus of intensification policies.
- c) Intensification targets should be based on the characteristics and housing market of each municipality. Recognition of the local context will help increase community acceptance and reinforce neighbourhood identity.
- d) Each strategic growth area should be required to set a minimum density target in the Official Plan and implemented through pre-zoning or establishment of a CPPS within one year.
- e) Development should be prioritized in areas where nodal growth models can be established to achieve 15 minute neighbourhoods.
- f) As noted above, the focus should be more on built form and densities and less on restricting growth due to restrictions based on population and employment forecasting.
- g) Density targets should also be maintained and increased, where appropriate, for Urban Growth Centres and Major Transit Station Areas as well as other Strategic Growth Areas.
- h) Further policy consideration should be given to the distribution of densities on a municipality-wide basis based on context, transit, services and need for housing typologies.



## **Large and Fast-growing Municipalities:**

New Provincial policies should prioritize and support large and fast-growing municipalities that will need to be best prepared to increase housing supply. More specifically:

- a) Align local settlement expansions, secondary plans, and phasing with the Provincial capital program and initiatives to prioritize housing supply most effectively.
- b) Prioritize development-ready projects with developers capable of front-ending and providing infrastructure without waiting for municipal processes and funding.
- c) Enhance and clarify the rules around front ending and ensure that where there is front ending of municipal infrastructure, development charge credits are available to those owners doing the work and that future developments are required to reimburse those who front ended.
- d) Ensure that development charges are used solely for growth related capital costs.
- e) Align infrastructure investments and programs with provincial housing targets.
- f) Establish pilot programs in rapid growth areas to test models for faster development approvals.
- g) Master servicing programs must keep up with forecasted growth rather than slowing down housing supply when servicing capacity is not available. Master servicing programs should be driven by housing targets.

## Environment and Natural Resources:

### **Natural Heritage:**

There is no question that natural heritage features are critically important for the health of the Province and its residents. However, more clear policy direction could better link and integrate features into development models. More specifically:

- a) Significant natural heritage features need to be protected, but protecting small, isolated features in the midst of a development requires linkages to a broader urban system for those features to be successful. This approach can lead to fragmented urban systems, inefficient land use and costly servicing plans.

- b) Fragmented urban systems reduces walkability and transit supportability and does not help to reduce the impacts of climate change.
- c) Providing for off-setting which replaces the isolated feature with natural restoration adjacent to existing significant features can bolster the viability of the feature and create more walkable, transit-supported communities.
- d) Mattamy agrees with initiatives that will provide more options to reduce development impacts, including offsetting/compensation. We are also in favour of proposed updates to the Ontario Wetland Evaluation System (OWES) raised in the text of the Province's ERO posting. More specifically:
  - i. Removal of the wetland complexing approach- this has been a significant barrier to the creation of new communities and in the implementation of efficient infrastructure and housing;
  - ii. The formalization and standardization of rules for re-evaluating wetlands and updating mapping;
  - iii. The clarification of when (and by whom) a wetland can be determined to be provincially significant; and
  - iv. A review of the scoring system, which if not revised, will contribute to the OWES being misinterpreted and applied in a manner that might inflate the significance of some wetland features (e.g., need for maximum limits on scoring for some special features categories).

### Community Infrastructure:

#### **Infrastructure Supply and Capacity:**

Without improved models to effectively deliver supporting infrastructure, it is quite possible that the Province's efforts to provide housing faster will be in vain. Infrastructure could become the next 'bottleneck' in the housing continuum, and it is important that policies and funding programs address this matter now. More specifically:

- a) For large urban areas, municipal servicing must be provided in tandem with the demand for housing and not constrain supply.
- b) Provincial funding should be provided for major infrastructure works where municipalities risk exceeding their debit loads.
- c) As settlement expansions and increased land supply occur, there is a possibility that a lack of servicing and building resources will continue to restrict 'houses on

the ground.’ Provincial guidance on infrastructure supply through programs like standardized pre-servicing agreements and infrastructure financing would ensure success after provincial planning improvements are established.

- d) Increased flexibility for wastewater servicing options in smaller rural settlement areas would be beneficial.
- e) Master servicing programs need to align with housing targets.
- f) Long-range infrastructure planning will need to ensure coordination between multiple lower tier municipalities (e.g., County of Simcoe), particularly in the absence of formal regional programs.
- g) Remove the peer review process from detailed design by having pre-certified/pre-approved consultants undertaking the design. Peer review processes in general use up significant time and resources by reducing the value placed on qualified professionals to get things done.
- h) Stormwater management infrastructure will become more important in dense communities and with climate change. Alternative low- impact development and infiltration models should be promoted through provincial standards and approvals. Credits for LID need to be reflected and credited to offset traditional SWM infrastructure.
- i) As noted above, enhance existing rules to clarify the rules around front ending and ensure that where there is front ending of municipal infrastructure, development charge credits are available to those owners doing the work and that future developments are required to reimburse those who front ended.
- j) Ensure that development charges are used solely for growth related capital costs.

### **School Capacity:**

The infrastructure needed for education is changing. It is unrealistic to expect a decades-long approach to the provision of school sites to apply to new growth models and increased land costs. Schools are foundational for communities, but they need to be better integrated and more compact. Specifically:

- a) Allow flexibility to facilitate vertical schools and mixed-use developments that include schools within the multi-use buildings to free up land for housing supply and provide for schools in already developed areas.

- b) Mandate the reduction of school site sizes to a standard size that considers the availability of transit for staff and on-street drop-off of children from buses and cars. Require that new stand-alone school designs occupy a reduced footprint through minimum building heights (e.g., three stories) and shared facilities.
- c) Encourage the use of shared facilities with abutting park facilities and associated parking, playing fields, etc. for greater efficiencies and range of amenities.

### Streamlined Planning Framework

#### **Outcomes-Focused:**

The Province has recognized the benefit of outcome-based thinking as opposed to prescribed processes that don't necessarily add value to the development approval process. There is an opportunity to standardize planning documents to drive this mandate and make planning approvals more predictable and replicable across the Province where they produce desired outcomes. More specifically:

- a) Standardized Official Plans and policies to be designed with a focus on outcome-based thinking would benefit planning approval processes.
- b) The study requirements in 2.2.8.3 of the Growth Plan should be simplified. At the determination of locations for growth, there should not be the need to determine if infrastructure is financially viable over its lifecycle. That should be done at the detailed secondary plan level. Being informed by water and wastewater master plans is also onerous as it requires the master plans to be done concurrently with the Municipal Comprehensive Review. The key test should be whether there is existing or planned water and wastewater capacity.
- c) The test in 2.2.8.3 d), which requires "the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water", should not be required at the land needs stage but rather at the implementing secondary plan stage.
- d) The requirement for settlement expansions to avoid prime agricultural areas or if avoidance is not possible choose lower priority agricultural lands is a good principle. However, the requirement to be in compliance with MDS formulae which is a guideline is onerous and should be a minor consideration in settlement expansions.
- e) The requirement to not have any adverse impacts on the agri-food network should not be a requirement unless there is an impact to specialty crop areas

### Speed and Flexibility:

While the municipal approval process does ensure good planning outcomes, the development industry, now more than ever, requires systems and procedures that are faster and more flexible to get houses in the ground sooner. More specifically:

- a) Streamlining the land needs assessment process, which is a technical process with minimal public input, would be a welcome policy change.
- b) Standard methodology for population and employment forecasting and a simpler land needs assessment that can be easily tailored to the character of a municipality can help to provide speed in implementing provincial directions.
- c) Standardized policies, application requirements and conditions would speed up development and make decisions more consistent. Ultimately, this would add more certainty to the development process to encourage projects and investment (refer to BILD Municipal Benchmarking Study).
- d) Frequent, provincial level updates to population and employment forecasting may be an option as it would ensure consistency of approach and, by consolidating these forecasts at the provincial level, updates could be done on a more frequent basis.
- e) Land use planning applications have become subject to increased studies and reports – often to little end and significant overlap between OPA, ZBL, and site plan applications.
- f) Suggest that the Province establish clear requirements for "complete applications", with some room for municipalities to reduce these requirements in contexts where a particular study is not necessary.
- g) Reduction in the "pre-application" processes that have developed over the past decade. If a pre-application process is desirable, the Province should set out a clear set of rules as current practice is inconsistent and time consuming.
- h) A more standard environmental impact study regime that is consistent across the Province. Currently these studies are lengthy, expensive, and often require outcomes to be re-evaluated multiple times in the process.

## **Question 2: What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?**

The core elements, responded to above, provide an excellent starting point for accelerating development by integrating and streamlining policies that better deliver housing. In particular, we offer the following responses regarding Question 2:

- a) Require municipalities to set minimum density targets for all strategic growth areas.
- b) Require municipalities to pre-zone lands in all strategic growth areas for the heights and densities permitted in the Official Plan. Flexibility also needs to be maintained to allow for the lands to change with market demands over time.
- c) All municipalities to ensure a 15 year supply of lands designated within secondary plans and in strategic growth areas.
- d) All municipalities to ensure infrastructure is in place to allow for a 5 year supply of housing that is zoned and has servicing capacity.
- e) Policies to ensure housing supply types are matched to demographic and market needs.
- f) Allow land exchanges, without a net gain for edge properties at the urban boundary. For instance, allow the “squaring off” of angle property lines, the use of natural features, major roads, and highways as limits of the urban boundary and provide some flexibility to adjust the boundaries (lands in, lands out) to have more regular parcels of the same size.

## **Question 3: How should the government further streamline land use planning policy to increase the supply of housing?**

Streamlining is the responsibility of all parties in the development continuum. The Province plays a leadership role that can jump-start new approaches based on outcome-based thinking. There is a real need for housing supply now. Provincial initiatives could include:

- a) Provisionally certify/recognize key development team members (planners, engineers, ecologists, noise, heritage, urban design, etc.) to prepare ‘decision ready’ application packages that do not need third-party peer review. This arrangement could be trialed by a local pilot program to ‘jump start’ improvements in the application consideration process.

- b) Mandate the use of a CPPS particularly in strategic growth areas and ensure flexibility is included for changing market demands over time.
- c) Permit conditional zoning so that land use decisions can be made sooner, and details of development established later at the time of detailed design and professional certification.
- d) Establish an expediated process to remove holding provisions.
- e) Establish standardized complete application checklists and content checklists. Currently the process is duplicative and repetitive. It treats every application as new and unique when in many cases comments and conditions are standard. Establish an appropriate level of detail at each stage of the planning process.
- f) Standardize the scope and requirements for what additional information local authorities can ask for during the application process.
- g) Remove the ability to require non-statutory processes like Block Plans, Master Plans, Tertiary Plans. Leave the detailed work to the subdivision /site plan stages when information is available to determine the best solutions.
- h) Establish Province-wide standardized online permit tracing and processing.
- i) Update notification processes to remove mail requirements and reduce notice times.
- j) Include standardized plain language notices and layperson images.
- k) Set timelines for review agencies to respond by including clearance process for final registration of subdivision/condominium.
- l) Local municipalities should be required to immediately schedule public meetings and commit to dates for Council decisions when an application is deemed complete.
- m) Municipalities should report back to the Province on standard key performance indicators (KPIs) to use as a consideration for future funding decisions when granting money from the Province to municipalities (e.g., infrastructure funding/financing).
- n) Prohibit phasing of greenfield communities that artificially delay housing supply and instead require infrastructure staging based on allocation that achieves the timely needs of the housing market



**Question 4: What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?**

The following list was generated as a result of the analysis and comments above:

- a) Growth Plan 2.2.1.2 which directs growth to settlements and strategic growth areas.
- b) Growth Plan 2.21.4 on complete communities but with stronger policy direction mixed-use use development that achieves walkable communities.
- c) Growth Plan 2.2.3 on Urban Growth Centres and minimum densities provided timeline to achieve densities is moved to 2051.
- d) Growth Plan 2.2.4 on MTSAs.
- e) Growth plan 2.2.6.2 provides policies to support complete communities but should be revised to ensure a range of ground-related, missing middle and high-density housing is provided.
- f) Growth Plan 2.2.6.4 and PPS 1.4.1 requiring a 15 year and 3 year supply of residential units, but the emphasis should be changed to provide for a 15 year supply of designated land and a 5 year supply of residential lots sufficient to accommodate both ground-related, missing middle and high-density housing.
- g) PPS 1.4.3 a) on affordable housing but with strengthened policies on how all levels of government need to help to achieve affordable housing. The challenge of providing affordable housing has to be met by all parties, not just the development community. Other home purchasers within the same development shouldn't have to shoulder the additional costs on their home accrued by builders having to subsidize a portion of the housing stock.
- h) PPS 1.4.3 b) 2. Permitting all forms of residential intensification.
- i) PPS 1.4.3 e). Requiring transit supportive development.
- j) PPS 1.4.3 f) establishing development standards but more clarity should be provided on what development standards municipalities should implement to achieve denser forms and achieve intensification. Also for intensification and mixed-use development, the policies should require development standards that reduce parking requirements.

**Question 5: What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?**

The following list was generated as a result of the analysis and comments above:

- a) PPS Part IV vision should be streamlined so that it is actually meaningful and not trying to be all things to all people. Instead, the Province should set the policy direction that best delivers its mandates (e.g., more homes sooner).
- b) Similarly, PPS 1.1.1 should focus on key principles that are aligned with Provincial priorities in order to meaningfully establish and interpret policies deemed a priority for Ontario.
- c) PPS 1.1.3 and Growth Plan 2.2.1 should be combined and streamlined.
- d) PPS 1.1.3.8 and Growth Plan 2.2.8 should be combined and streamlined as indicated previously in this submission.
- e) PPS 1.3 and Growth Plan 2.2.5 should be combined and streamlined.
- f) PPS 1.1.5 and Growth Plan 2.2.9 should be combined and streamlined.
- g) PPS 1.6 policies on servicing and Growth Plan 3.2 should be combined and streamlined and address limitations on servicing allocations that seek to delay housing supply.
- h) Growth Plan policy 4.2.1 and PPS 2.2 should be combined and streamlined.
- i) Growth Plan 4.2.2, 4.2.3 and 4.2.4 on an NHS and KHF and KNHF for the Growth Plan should be deleted as it doesn't do any more than what the PPS requires in policy 2.1.
- j) Growth Plan 4.2.6 should be deleted as PPS section 2.3 provides sufficient direction for Agricultural Areas.
- k) Growth Plan 4.2.8 should be combined with PPS 2.4 and 2.5 and simplified.
- l) Growth Plan 4.2.7 should be deleted as PPS 2.6 provides sufficient direction.
- m) Growth Plan 4.2.10 should be combined with PPS 1.8 and simplified.

We appreciate the continued leadership of the Province to improve housing supply and provide effective planning policies that are critical in supporting a collective approach to this problem. Mattamy welcomes the opportunity to be a partner in helping Ontario with its housing supply challenge.

If you have any questions regarding our submission, please do not hesitate to reach out.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Sjogren', with a long horizontal flourish extending to the right.

Andrew Sjogren  
Senior Vice President, Land Development, Mattamy Homes Canada  
[Andrew.sjogren@mattamycorp.com](mailto:Andrew.sjogren@mattamycorp.com)