

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

via email: growthplanning@ontario.ca

Attention: Hon. Steve Clark

**Re: ERO 019-6813
Comments on Behalf of Minto Communities Canada**

Dear Minister Clark:

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,

MINTO COMMUNITIES CANADA



Vince Santino,

Vice President, Development

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.

Requiring large/fast-growing municipalities to be subject to growth management-related policies as outlined in the draft PPS is a more practical and appropriate approach as one Planning Statement can be made applicable province-wide and at the same time not inhibit smaller or slower-growing municipalities.

The draft PPS states "At the time of each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 25 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon of each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 25 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon."

We believe that this planning horizon is appropriate and will make it easier to meet Ontario's housing needs. We also believe that the province should continue to prepare forecasted minimum population and housing targets for those larger and faster-growing municipalities as previously mandated in the Growth Plan toward the Province's minimum housing targets to 2031 and require that these municipalities demonstrate in their official plans how these targets will be met within the timeframes stipulated in the PPS. As Official Plans are typically reviewed every 5-10 years, Minto urges the province to make clear that the implementation of the proposed PPS 2023 will take immediate force as it relates to all municipal decisions, including zoning by-laws and permitting processes, even before a municipality's Official Plan has been updated.

The PPS should also be more specific about enhancing minimum intensification targets throughout the entirety of any municipality's settlement area boundary so that all areas with opportunities are supported for various and less intense infill development that may otherwise be opposed by local anti-growth sentiment.

Affordable and attainable housing criteria must also be defined and the Development Charges Act revisions need to be reflected in the new PPS accordingly. Clarification is also required to the extent that additional residential units are to be encouraged and supported in various forms of housing including single, semi-detached and townhomes and that these units facilitate the provision of purpose-built affordable rental housing. Planning Act permissions are already reflective of this, and the PPS should be consistent with these.

We have concerns about what appears to be an omission of appeal rights for private applications as per Settlement Areas (Section 2.3). This omission could give municipal governments a tool to blunt desperately needed housing developments. As such, we are deeply concerned that any municipal council that is anti-growth could oppose any of these applications and builders would have no recourse. We believe this runs exactly opposite to the province's goal of getting more homes built faster, with local governments that oppose new housing having more tools to keep newcomers out. Therefore,

Minto urges the government to include appeal rights for private applications on municipal decisions not to expand a settlement area or municipal failures to consider such an application in a reasonable time. Similarly, we are concerned about the lack of appeal rights on an application for an employment land conversion (Section 2.8). We are concerned that this could stunt growth and deny opportunities for homeownership. With changing patterns of office use and increased interest in mixed-use development, employment land conversion is an essential source of land for residential development. The province should ensure that it is supporting conversions that unlock badly needed residential development by ensuring that projects that align with provincial priorities can access the Ontario Land Tribunal if needed.

Further, we believe that Ontario and its aspiring homeowners would be well served by the province investing more resources into the OLT and/or by further streamlining it, such as by screening appeals for merit and ensuring faster decisions. We also urge the province to communicate what actions it will take to enforce the Municipal Act and to ensure that municipalities act in ways consistent with helping the province achieve its homebuilding targets.

Section 3.1(2) of the proposed PPS states that Planning and investments in infrastructure and public service facilities should be prioritized to support strategic growth areas as focal areas for growth and development. There must be fairness for aspiring homeowners who cannot afford to live in major hubs or who may wish to live in settings they deem more appropriate for their families and or other needs. We, therefore, urge the province to consider modifying this language in the PPS to ensure that infrastructure funding for greenfield subdivisions receives equitable attention, priority, and investment.

Direction to utility providers must be provided to ensure their integration and coordination with municipalities from a planning perspective so that future service planning supports and facilitates forecasted growth and the delivery of housing. Legislative and policy changes need to be considered by the province to this effect. In addition, municipalities should be required to prepare master planning and be held accountable for infrastructure delivery mechanisms including mandated updates of Master Servicing and Transportation Plans, Capital Budgets, and Development Charge Background Studies and Development Charge By-laws to accommodate planned growth.

We strongly support the use of alternative servicing solutions to enable development in areas where typical full municipal servicing solutions are not viable.

In addition to forward planning infrastructure investment policies supporting planned growth, the following should also be considered:

- Floodplain mapping and associated modelling in urban areas should be prepared to account for proposed growth, including stormwater management facilities and flood mitigation work in these areas. It is not appropriate to assume a no-mitigation approach to flood plain modelling in an urbanizing area. This approach should be incorporated into the policies of the new PPS and in related guidance material from the province.
- Policies that encourage the provision of passive recreation activities including trail systems within gas/hydro and other utility corridors where appropriate
- We strongly support the policy direction to require school boards to integrate planning for schools and growth; the policies should specifically speak to the minimization of school sites

sizes when collocated with parks and should strongly encourage the provision of schools in mixed use formats, including within multi-storey residential buildings.

Lastly, we believe that more clarity is needed in the language on Rural Land in Municipalities. To minimize potential conflicts with agricultural uses and existing or new residential areas, guidance should be given that generally encourages municipalities to designate lands rural abutting residential areas and settlement area boundaries. This can serve as a transitional area between urban and prime agricultural areas, providing uses that can serve both areas.

The proposed environmental protection policies should be provided in the context of a 'Housing First' policy goal and objective which should be added to the PPS for development within settlement areas. An urban lens should be provided for environmental protection in settlement areas, generally directing that the natural function of environmental features should be preserved through green infrastructure in urban areas. Such policies would support the provision of housing through the efficient use of land and is to ensure housing in settlement areas takes priority over other competing policy objectives.

We believe it is important to implement modifications to the natural heritage polices to enable our industry to create healthier communities more efficiently and effectively. Policy should look to shift from the no negative impacts test to a no **net** negative impact test for natural heritage features and associated functions. The formal adoption of an ecological **offsetting** approach to allow for the selective removal of generally smaller and degraded natural heritage areas with limited functions would allow for removed features to be replaced, achieving a net ecological gain (i.e., nature positive outcomes).

Including general policies for implementation and interpretation of the PPS is critical to ensuring the policy direction of the province is met. As the *Planning Act* currently requires that all decisions be consistent with the PPS, the purpose of policy 6.1.7 and the province's direction to municipalities respecting updates to their official plans is unclear.

We thank you for the opportunity to provide our comments and trust you will consider the same in any new iteration of the Provincial Policy Statement.