

Ministry of Municipal Affairs and Housing  
Provincial Planning Branch  
13<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON, M7A 2J3

November 22, 2025

**Subject:** ERO 025-1097 | Proposed Changes to the Planning Act

Mattamy Homes Canada is pleased to provide comments as they relate to the consultation on changes to the Planning Act.

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 Ottawa, Calgary, and Edmonton. Each year, Mattamy helps more than 5,000 families across Canada achieve the dream of homeownership.

**Comments:**

Minor Variances (As-of-right Variations from Performance Standards)

While we are generally supportive of the proposed changes, we recommend the alignment of regulatory relief and municipal servicing/infrastructure readiness. For example, "as-of-right" provisions may result in fast tracking, but if the standard for servicing, design or infrastructure is still more stringent, savings related to cost and time may be limited. As such, we recommend that the province outline and provide the zoning performance standards eligible for these "as-of-right" variations as well as provide provincial mapping and/or update municipal mapping for eligible "specified lands"; we suggest that this includes growth areas.

In addition, having variations to zoning standards permitted "as-of-right" would be positive. However, we suggest further review to evaluate any unintended consequences, as it could allow municipalities to make their zoning more restrictive in certain circumstances.

Gentle intensification of existing urban neighbourhoods is one of the largest opportunities for unlocking housing in Ontario. However, a slight variance is often required in order to comply with the strict performance standards of adjacent properties. The cost and schedule implications of attending Committee of Adjustment meetings to request slight deviations from established standards – particularly for missing middle housing – disproportionately impacts the feasibility of the project at this small scale and can be a deterrent to building much needed missing-middle housing. It is often infill applications

that have a site plan control application nearing final approval that are subject to delays waiting in queue for a Committee of Adjustments meeting. With the increased upfront certainty and possibility that comes from relaxed standards, developers will be empowered to propose more opportunities for much needed diverse and affordable housing.

Rigid performance standards can make it challenging to employ newer, more innovative forms of housing, such as modular midrise construction. Newer, more innovative forms of housing such as midrise modular construction may not fit within existing, dated by-laws and policies. Relaxed performance standards will provide much needed flexibility faster than municipalities can update zoning by-laws, complete the required consultation and implement any changes. Speed is supply, and increased flexibility will help deliver housing sooner.

Examples of challenging performance standards that should be reconsidered:

- Angular plane or step-back requirements for midrise buildings
- Minimum softscape or landscaping requirements
- Minimum first floor ceiling height requirements
- Soil volume and/or tree planting minimums
- Indoor and outdoor amenity requirements
- Balcony projections beyond the main building face

#### Policy Statements and Minister's Decisions

We support this proposal and recommend that emphasis on large scale residential projects be included in this category.

We appreciate the opportunity to provide feedback and look forward to continued collaboration on measures that enhance transparency, efficiency, and timely housing delivery across Ontario.

#### **For additional information:**

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