

March 8, 2023

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**Re: City comments on Proposed Minister's Regulation under the Planning Act:
Municipal Reporting on Planning Matters (ERO 019-6619)**

On February 6, 2023, the Provincial government posted a proposed regulation of the Planning Act, with the commenting period closing on March 8, 2023. The proposed regulation seeks to compel municipalities to report data to the province to measure progress towards the Housing Supply Action Plan commitments, including the provincial goal to build 1.5 million homes by 2031.

The proposal indicates the identified municipalities, which includes the City of St. Catharines, would be required to report quarterly on the following matters:

- Official Plan Amendment applications
- Zoning By-law Amendment applications
- Plans of Condominium
- Plans of Subdivision
- Site Plan Control applications
- Land severances
- Minor variances
- Number of housing units built as-of-right

In addition, municipalities will report annually on areas identified as strategic growth areas, areas subject to intensification targets, employment areas and employment area conversions, existing water and wastewater infrastructure, and major transit station area boundaries. For the City of St. Catharines, this means the Urban Growth Centre (downtown), the GO Major Transit Station Area, and built-up area.

Finally, municipalities must source and submit five year historical data (2018-2022 inclusive) for all datapoints identified above by the end of the calendar year.

Planning staff are supportive of a uniform, Province-wide growth monitoring and tracking methodology and welcome the opportunity to provide comments and recommendations on the proposed regulation to assist the municipality and province in achieving the intended outcomes.

Comments

- The City's current IT capabilities do not include some of the more sophisticated data sourcing requirements under consideration. Specifically, the City's AMANDA and GIS software do not share an interface that would be able to run reports on the geographical area growth monitoring requested above. This will require extensive staffing resources to undertake manual data exercises, on a quarterly basis. Assembling the requested data for the past five years will be a significant undertaking that has not been accommodated in current work plans or staffing assignments. At this time, it is anticipated that this will detract attention from development approvals staff to undertake this exercise thereby slowing development approvals.
 - Recommendation: Given Ontario seasonality of construction, it would be more efficient to report all data to the province on an annual basis.
 - Recommendation: Provide a minimum six months before the first dataset is required to afford municipalities time to review the guidance document, detailed instructions, sample templates, and develop an internal process to gather and report on the required data.
- The data for collection targets the processes and timelines on the municipal side, however there are other external factors, such as incomplete applications, resubmissions, redesigns, and decisions of the applicant, that influence the process and timing. The inclusion of additional detail and data would support a more complete database that would help measure the effectiveness of the process and more accurately identify aspects for review and improvement. It is common for applications to be placed on hold at the request of the applicant while they secure funding, consider market changes, respond to community feedback, or consider project changes. The requested metrics also do not capture lag time between municipal approvals and project commencement.
 - Recommendation: That the following additional metrics be considered for inclusion:
 - date of pre-consultation
 - date application deemed incomplete
 - date complete application submitted/received
 - additional application status options – deferred, withdrawn
 - date building permit application received
 - Recommendation: Provide further clarification on the following information for collection:
 - Proposed Use
 - Are municipalities to report what was initially applied for or what ultimately was considered/approved?

- Employment Area Conversions
 - Are municipalities to report on new requests only or previous approvals?
- Water/Wastewater Infrastructure
 - In the case of a two tier structure, is this information to be provided by the lower or upper tier municipality?
- The proposal indicates an intention for municipalities to submit the required data to the province by email. The extensive data being requested is anticipated to result in larger file sizes that may be difficult to send by email.
 - Recommendation: Consider development of a provincial portal where municipalities could login and upload required files.
- One of the key factors for the proposed municipal data reporting is to measure progress towards the development of new dwelling units. The applications to be reported on includes all applications, regardless of use or context. For example, a minor variance for a parking reduction in a commercial plaza is required to be included in the dataset, even though the application does not result in any new residential dwelling units.
 - Recommendation: If the intention of data reporting is to measure progress towards new residential dwelling units, the information for collection could be scoped to only those applications relating to new residential dwelling units.

Conclusion

The City of St. Catharines has been assigned an aggressive growth target of 11,000 housing units by 2031 which exceeds the City's historical growth rates. The City is committed to making every effort within its control to accelerate the construction of housing units to meet this target. The City has undertaken many progressive policy, process, and technology investments to position St. Catharines to be able to accommodate the processing of development applications to assist the Province in meeting its housing goals.

While planning staff are supportive of a uniform, Province-wide growth monitoring and tracking methodology, we request consideration of the recommendations outlined above. These recommendations have been provided to support collection of data that achieves the intended purpose of measuring progress towards the Housing Supply Action Plan commitments, including the provincial goal to build 1.5 million homes by 2031, while prioritizing staff time and resources for review and approval of development applications.

If you have any questions, please contact Taya Devlin, Senior Planner at tdevlin@stcatharines.ca or 905.688.5601 extension 1709.