

March 7, 2023

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Sent via email: scott.sterling@ontario.ca

Re: ERO 019-6619 and ORR 23-MMAH001 – Municipal Reporting on Planning Matters: Proposed Minister’s Regulation under the Planning Act

Dear Mr. Sterling:

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario (ERO) and Ontario Regulatory Registry (ORR) posting with respect to municipal reporting on planning matters.

General Comments

Region of Peel (Region) staff support the Province’s efforts to establish data standards and regular reporting. This will be valuable to track progress towards Ontario’s Housing Supply Action Plan commitments, including the construction of 1.5 million new homes over the next ten years and creating more housing options.

Upper-tier municipalities play a critical role in planning and coordinating infrastructure and services across municipal boundaries and supporting measuring and monitoring of housing data to support growth. The Region is not included in the proposed List of Municipalities to which the regulation would apply, however, it has an interest due to managing and owning enabling infrastructure for housing, being service manager for affordable housing and being responsible for some of the datapoints required for reporting. Some datapoints that the Region is responsible for are difficult to differentiate between municipal systems and boundaries and may require data-sharing agreements with local municipalities.

While data elements on housing supply are important to report on to measure progress on Ontario’s Housing Supply Action Plan, the inclusion of additional datapoints on housing affordability and a range and mix of housing options will better support efforts to ensure that new supply is truly affordable to low and moderate income families and meets local housing need.

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Regular reporting of data elements would be valuable not only for individual municipalities but also for planning in the entire Greater Golden Horseshoe. Coordinated planning and development data provides a unique opportunity to strengthen the development intake and review process and open data by creating efficiencies and structured data inputs and standards. Regional staff strongly encourage that the data collected be publicly available (aggregated or anonymized as required) such as through the Province's open data portal (data.ontario.ca). In addition, data reporting should include a consistent approach to providing metadata.

Format and Frequency of Reporting

Creating a standard format and frequency of reporting will be critical for municipalities (upper-tier and lower-tier) to assist municipal-specific and collective planning efforts to support Ontario's Housing Supply Action Plan.

While it is appreciated that there is a standardization to the format and frequency of reporting, some of the reporting timelines (such as the Dec 31, 2023 deadline for five-year historical data) will be challenging for municipalities to meet. In addition, some of the data reporting intervals are not as relevant for some datapoints (e.g., new employment area conversions may not always occur in a given year). Some municipalities have expressed that there may be resourcing challenges to meet datapoint collection requirements and reporting timelines. Regional staff request that the Province explore opportunities to provide additional support to address these challenges.

Regional staff recommend that data collected as a result of this proposed regulation be made available as Open Data in accordance with Provincial data practices and the Province's data plan which includes measures such as the *Simpler, Faster, Better Services Act, 2019*. This will enable its use in analysis by municipalities, community organizations, academics, industry, and the public, which in turn has the potential to foster innovation and valuable insights from across the housing sector to address Ontario's housing crisis.

Datapoints may require caveats or disclaimers with regards to their use and interpretation and a data dictionary with consensus definitions may be required. For example, water/wastewater infrastructure mapping can be provided; however, it should not infer that capacity is always available. It would be beneficial for municipalities to work with the Province to clarify definitions, sources, data elements and datapoints, and format and frequency of reporting.

Geospatial data formats are supported by many municipalities, but in some instances may require upgrading or replacement of technology or retooling of processes to produce data in the required format and frequency of reporting.

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Proposed Data Elements

Planning Application Data (Community Infrastructure and Housing Accelerator and Ministerial Zoning Orders, Land Severance (Consent), Minor Variance Applications, Official Plan Amendment Applications, Plan of Condominium, Plan of Subdivision, Site Plan Applications, and Zoning By-Law Amendment Applications)

Regional staff generally support the proposed data elements from planning and development applications.

For plan of condominium, the data metric “net new residential condo units” should be standardized across municipalities. Data could be grouped by unit floor space area as this will help to determine the growth of available space and allow for comparisons to floor space consumption per capita.

For subdivision data, plan of condominium, and site plan applications, existing, demolished, added, and net area floor space area, total urban area, and community space area should be added as datapoints.

For plan of condominium and subdivision data elements, adding datapoints for market sale price per unit and number of units by bedroom type would support efforts to increase housing affordability and more housing choices.

Strategic Growth Areas with a Minimum Target and Areas Subject to an Intensification Target, Employment Areas and Employment Area Conversions

For employment areas and conversions, total floor space, total residential and employment floor space being demolished in redevelopment, and additional floor space being included as additional datapoints would be helpful to support planning. Additional datapoints that could be added include floor space consumption per capita and community space area as this will assist municipalities in determining urban space and total density.

It is important to differentiate between upper-tier employment areas and regional employment area conversions (for which a municipal comprehensive review is required and may not occur in a given year) and lower-tier employment areas and conversions.

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Existing Water and Wastewater Infrastructure

Upper-tier municipalities play a critical role in planning and coordinating infrastructure and services across municipal boundaries to support growth.

The Region is responsible for the proposed data element on existing water and wastewater infrastructure due to managing and owning infrastructure that enables housing development. Water and wastewater data is difficult to differentiate between municipal systems and boundaries (i.e., to separate Regional upper-tier data by local municipality) and may require data-sharing agreements with local municipalities.

Water and wastewater infrastructure is cross-municipal and planned and operated as a system that extends across the Region to Lake Ontario and does not always align with lower-tier municipal boundaries. Understanding the amount, timing, and location of new housing supply is important to plan for and allocate sufficient infrastructure capacity. Reporting of water and wastewater data may require caveats and disclaimers with regards to use and interpretation and a data dictionary with consensus definitions may be required as mapping of capacity should not always infer that capacity exists. In addition, capacity in a specific location (e.g., a mature area with a plan to redevelop and accommodate greater density of people) may change over time and require upsizing of infrastructure.

Major Transit Station Area and Settlement Area Boundaries

Regional staff generally support the proposed datapoints for major transit station area and settlement area boundaries.

Suggestions for Additional Datapoints

Regional staff recommend including datapoints on housing affordability and a range and mix of housing options to support efforts to ensure that new supply is truly affordable to low and moderate-income families and meets local housing needs.

In this regard, Regional staff recommend the following datapoints be added to reporting requirements:

- New affordable residential rental and ownership units as defined by section 4.1(9) of the *DC Act*
- New attainable residential units as defined by the *DC Act*
- New community housing, emergency shelter, and supportive housing units
- Purpose-built rental units lost to demolition and conversion to condominium
- New purpose-built rental units created

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- New residential units by bedroom type (bachelor, one bedroom, one bedroom plus den, two bedroom, two bedroom plus den, three bedroom)
- New residential units by intended tenure (rental, ownership)
- New residential units by intended price
- New residential units by floor space
- Residential units with a first-time owner
- Annual Community Benefits Charge revenue allocated to housing-related initiatives
- Annual number of agreements or contributions to create affordable housing (e.g. land, units, etc.)

Conclusion

Regional staff appreciate the opportunity to provide comments on proposed municipal reporting on planning matters. The Region is committed to contributing to the Province's goal of getting 1.5 million homes built over the next 10 years and supporting Ontario's Housing Supply Action Plan.

The Province should continue to consult with municipalities and stakeholders while developing guidance materials and finalizing data elements, datapoints and reporting timelines. Municipalities are committed to data reporting that is accurate and up to date to measure progress towards the Housing Supply Action Plan commitments and support municipal and provincial planning processes. Regional staff also encourage the Province to expand the reporting datasets to include consistent data on housing affordability. The Region is also committed to working with lower-tier and other upper-tier municipalities to further support the Province's initiative to develop Data Standards for Development and Planning Applications and provide more consistent rules and guidelines for the exchange of data required for planning and development applications and better interoperability, connectivity, and communication between digital platforms to make data sharing easier.

I would be pleased to provide any clarifications or additional comments on these matters.

Sincerely,



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