

May 10, 2024

Ministry of Municipal Affairs and Housing  
17th Floor, 777 Bay Street  
Toronto, ON  
M7A 2J3

**\*\*SUBMITTED ELECTRONICALLY\*\***

**RE: Environmental Registry of Ontario Posting 019-8368: Proposed Amendments to Ontario Regulation 73/23: Municipal Planning Data Reporting**

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Please accept this letter in response to Environmental Register of Ontario (ERO) proposal 019-8368 regarding the proposed modifications to Ontario Regulation 73/23: Municipal Planning Data Reporting. Staff have undertaken a review of the proposal and offer the following comments.

#### Proposal Summary

The Ministry of Municipal Affairs and Housing is considering amendments to Ontario Regulation 73/23 to:

1. Expand the list of municipalities to which the regulation applies; and
2. Improve the quality, completeness, and utility of the information required to be reported.
3. Require municipalities to make public a summary of the data reported.

#### Comments

Given the City of Barrie is a large and fast-growing municipality we have been completing the Municipal Planning Data Reporting under O. Reg. 73/23 for the past year. We generally support the proposed amendments under this consultation and appreciate the changes allowing for registration for plan of subdivision and plan of condominium to be a "reportable action" as well as the ability to indicate when an application has been withdrawn.

We have some concerns with the new requirement to provide a summary table for each planning-application type with the quarterly report, and post it publicly on the municipality's website, namely components 5(c)ii and 5(d):

5.(c)ii. Reporting on the total number of approved housing units for applications where the municipality approved or granted the application;

5.(d) reporting on the number of housing units proposed for applications submitted during the respective quarter.

It is our current practice and general agreement that Official Plan Amendments and Zoning By-law Amendments do not create units, they change land uses and zoning provisions to enable a subsequent planning application to be submitted, and it is the approval of that subsequent application (e.g., Draft Plan of Subdivision, Site Plan Control, Plan

of Condominium, etc.), that creates lots and housing units. Our concern is that counting units on OPA and ZBA applications is in essence double counting units.

To satisfy proposed amendment 6 – “provide a copy of the municipality’s geospatial data that identifies designated serviced land supply”, it would be appreciated if the definition of “serviced land” could be established by the province. I would also note this isn’t a geospatial dataset we currently have, but one that could be compiled with a definition of “serviced lands”.

Thank you for providing the opportunity to comment on this proposal.

Respectfully,



Michelle Banfield, RPP,  
Executive Director of Development Services

cc Mayor Alex Nuttall  
Michael Prowse, CAO, City of Barrie  
Wendy Cooke, Clerk, City of Barrie