



City of Peterborough
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May 10, 2024

Scott Sterling
Senior Policy Advisor
Ontario Ministry of Municipal Affairs and Housing
Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON M7A 2J3
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Dear Mr. Sterling:

Re: ERO019-8368 (Proposed Amendments to Ontario Regulation 73/23: Municipal Planning Data Reporting)

Thank you for the opportunity to provide feedback on the proposed amendments to the regulation for Municipal Planning Data Reporting. The City of Peterborough acknowledges that the Province previously estimated that adhering to the regulation would cost each municipality an annual direct compliance cost of \$3,953 for the first year, and approximately \$3,193 per municipality annually thereafter (equivalent to approximately three weeks of staff time) and that most of the initial 29 municipalities subject to this regulation indicate this was a significant underestimate.

The City is concerned that the reporting requirements will effectively pull time away from processing development applications as staff time, resources and ease of data availability are limited. The City is in the process of upgrading its AMANDA Property Database and Permits/Approvals system to streamline the development approvals process. Additional work to ensure “reportable actions” will be necessary to facilitate the reporting requirements proposed to be required by this regulation. This additional work will have implications in the overall streamline approvals project timelines and scope of work.

The City does not support the proposed requirement to report the total number of submissions (Item 5(b) of Appendix 2) as this would be onerous to track and would not be helpful to draw any conclusions in isolation of other data points not tracked through the regulation.



Additionally, the City believes that reporting on a quarterly basis as set out in Schedule 2 of O. Reg. 73/23 will place further strain on staff time and resources. In addition, the regulation has no end date/year for how long municipalities are required to fulfil the data reporting, creating a potential data reporting requirement beyond the 2031 Housing Pledge timeframe and in perpetuity. This proposed requirement appears to contradict the letter sent to Heads of Council on December 5, 2018 from the Ministry of Municipal Affairs and Housing indicating the Province had set a priority of “reducing the provincial reporting burden affecting the municipal sector” in acknowledgement that the reporting burden “impacts the ability of municipalities to focus on local priorities”.

To date, the City has committed to planning data monitoring and reporting measures in its 2031 Municipal Housing Pledge corresponding with the City’s needs and resources. Further, the City has also reported inventory data of unbuilt housing supply to the Regional Planning Commissioners of Ontario earlier this year. Should Schedule 1 of the regulation be expanded to the proposed list of municipalities in Appendix 1, the City would request that the proposed data reporting be required on an annual basis and that the Province offer municipalities adequate funding to support these efforts.

Finally, the City requests that the Province clarify the intent of data collection, as the scope of the data request expands beyond housing parameters. Furthermore, the City encourages the Province to minimize any duplication of effort by harmonizing, where possible, all municipal reporting processes such as the RPCO’s report and those described in the Municipal Housing Pledge. To enhance interpretation, data consistency and accuracy (e.g., minimize any double/triple-counting), the City encourages the Province to provide guidance and templates and create a reporting portal to facilitate large file uploads associated with geospatial data.

If any additional information or clarification is required, please do not hesitate to contact me.

Sincerely,



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CC: The Honourable Paul Calandra, Minister of Municipal Affairs and Housing
Members of Peterborough City Council
Jasbir Raina, Chief Administrative Officer, City of Peterborough
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Sarah McDougall Perrin, Government Relations Advisor, City of Peterborough
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