Regional Planning Commissioners of Ontario

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Ms. Hannah Evans, Assistant Deputy Minister
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Mr. Caspar Hall, Assistant Deputy Minister
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Re: Response to Proposed Changes to Municipal Planning Data Reporting (ERO Posting Number 019-8368)

Dear Colleagues:

On behalf of the Regional Planning Commissioners of Ontario (RPCO), please accept this submission to the above-noted ERO Posting.

RPCO is an organization whose members provide planning services and give planning advice to Councils of the largest single tier Cities and Regional municipalities, representing over 80% of Ontario's population. Our members are amongst the most senior, experienced and seasoned planning professionals in Ontario. We are fully engaged in planning matters on a daily basis across municipalities that are urban and rural; northern and southern; small town and big city. Our comments are both informed and relevant. To learn more about us, please visit RPCO.ca.

Across our membership, RPCO annually collects a housing supply inventory to assess the number of homes, by type, to understand approved and proposed units. We would be pleased to meet to present the inventory and to discuss our findings with Provincial staff. We understand the criticality of housing supply and affordability, and the many complexities that influence it. We have learned lessons from our annual exercise. More direct municipal involvement with the Province through RPCO can further strengthen this important work.

We appreciate the proposal to expand the data collection approach. According to the ERO posting, the list of municipalities required to provide information would grow from 29 to 50. It is unclear how the data is to be used. For example, if the data is to inform housing conditions across Ontario, it is important that a broader data collection approach be taken (affordability in particular) that also recognizes municipal differences (e.g. within or outside the GGH). Housing production is tied to so many influences that lie beyond the control of all levels of government.

This submission highlights common themes we have heard about realizing a larger data and analytics system. Our comments are largely focused on working toward a Province-wide protocol. RPCO's experience with its housing inventory could help to assemble a comprehensive system to support more progressive public policy.

Finally, our member municipalities may also be making their own ERO submissions that are more detailed and specific to their communities.

1. Overview

Conversations regarding housing have been a constant theme for RPCO members. How much is being built? How many units remain unbuilt and in what stages of approval? Is unbuilt supply located in areas of higher housing needs and demands? How affordable is housing, and how does it differ across Ontario's 444 municipalities?

In response to these questions, municipalities and the Province have begun to discuss a better data collection approach. This document suggests how the Province, in conjunction with all Ontario municipalities, might best approach such an important initiative.

2. Guiding Principles

RPCO sees the following considerations as essential to arriving at a credible data and analytics system:

a. *Start with a clear, shared statement of application for the data*. What will each data point be an indicator of? What other data points are essential to support root cause analysis? What is a summary table intended to show and how will it be used?

b. *Spend the time to get the "right" data indicators*. Distinguish greenfield and intensification indicators so that municipalities can provide the indicators that fit their context, but can be totaled for a consistent and comparable result.

c. *Make it manageable and funded*. Don't create a monster. Previous attempts at public sector data collection have failed because they were too big and required too many resources to support. Start with a minimum viable set of indicators and grow from there.

d. *Consistency of sources and reporting frequency, as well as broad acceptance of interpretation among data collectors and users, are essential* to make such a system viable and to achieve buy-in.

e. *Consult with municipalities to identify common indicators and road test* the proposed indicators with municipalities.

f. *Expect to make initial adjustments*.

g. *Thoroughly explore supporting technology, software applications, and GIS-based applications*.

h. *Apply it across the Province or in specific areas* (e.g. Greater Golden Horseshoe, fastest growing municipalities), and collect the data annually, just like a Financial Information Return. In other words, normalize it. Consistency of sources and reporting frequency, as well as broad acceptance of interpretation among data collectors and users are essential to make such a system viable and to achieve buy-in.

i. *Publish the results for all Ontarians to see*. Make the process transparent.

j. *Think Beyond Housing.* Any data collection and analytics approach should consider other Provincial interests, such as employment land inventories.

3. **The Right Data: What Needs to be Initially Collected**

Data collected should at a minimum support the following, which might be best undertaken in a series of phases, and gradually expanded annually:

a. Housing production (construction completions) by unit type and geography.

b. Unbuilt housing inventory by basic features (e.g. type of structure) and where possible, features like lot frontage and number of bedrooms.

c. If long-term care beds and student beds are being included in production or inventory numbers, ensure they are separately itemized. Ensure that the Ministry of Long Term Care will provide long-term care bed counts to municipalities.

d. Housing affordability for both units being produced and units in any unbuilt housing inventories. This is described in further detail in point 5 below.

e. Unbuilt housing inventory by status of approvals (registered, draft approved, site plan approved, proposed), including whether lands are serviced or serviceable.

f. Housing demolitions and how they are calculated into the overall housing inventory.

g. Tracking of additional dwelling units being created and their impact on the inventory.

h. Other development application statistics that meaningfully serve as indicators. For example, the aggregate number of minor variances in itself may not be helpful. It would also be helpful if the as-of-right construction of accessory units could be identified and reported.

4. **Identifying "Good" Data Sources**

This is an area where time needs to be spent, as exemplified by the following:

- RPCO members see building permit data as a key data source. However, this data needs to be carefully managed. For example, permits issued can be subsequently cancelled by the applicant, despite having been formally issued. Collecting additional building permit details will require time and investment.

- Caution needs to be exercised in use of CMHC data. We understand that CMHC does not collect some data across Ontario. Numbers based on the timing of CMHC's field survey will differ from municipal tracking of building permit events. Municipalities are the best source. Municipalities are the best source.

5. **Data Gaps**

- The biggest data gap pertains to housing affordability. In the past, the *Royal LePage Survey of Canadian House Prices* was a standard source used by municipalities. Partnerships with current housing-related organizations should be explored (e.g. Ontario Real Estate Association, MPAC).

- Separate market indicator research undertaken by the Province with municipalities could assist in understanding price points and rent levels in specific market areas across the Province.

6. **How do we maintain momentum toward achieving a sustainable and comprehensive data and analytics system?**

Make the process inclusive. Ontario municipalities have a lot of experience in information collection and management. Convene working sessions with all levels of government, home building industry, data experts, economists, academia and organizations with a strong knowledge of the Ontario housing market.

A review of best practices elsewhere would also be helpful.

RPCO reiterates its commitment to participating in such a process by having a workshop to explore data needs and sharing data from RPCO's annual housing supply inventory. Such an initiative needs to be directly led by the Province.

7. **A Closing Note**

Thank you for the opportunity to provide input. We trust these comments are helpful, and we invite you to call on RPCO as a resource to help address our mutual planning challenges.

Sincerely,

Thom Hunt, Chair
Regional Planning Commissioners of Ontario

cc.
RPCO Members
Association of Municipalities of Ontario