

May 10, 2024

Electronic Submission only**ATTENTION:**

Honourable Paul Calandra
Minister of Municipal Affairs and Housing
777 Bay Street, 17th floor
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Proposed Regulatory Changes to Ontario Regulation 73/23: Municipal Planning Data Reporting

Ontario Regulatory Registry Posting [019-8368](#)

Background:

On April 6, 2023, [Ontario Regulation 73/23: Municipal Planning Data Reporting](#), came into effect. This regulation requires 29 municipalities in Ontario to report information on planning matters to the Ministry on a quarterly and annual basis. The current posting proposes amendments to the regulation to expand the list of reporting municipalities; amend the information that is reported, including proposed and approved housing units; and require a key statistics summary table for each planning-application type, updated quarterly.

Comments:

Please find below, City Staff's comments in response to the proposed municipal planning data reporting amendments:

General Comments

Staff support this amendment to the information reporting requirements, to provide an overview of the development pipeline, upcoming projects, and housing units. In fact, through the City of Burlington's [Pipeline to Permit Committee](#), the City has already begun to track and report on its residential development applications and permits by development process stage on a monthly basis to support its housing pledge to the Province.

The City also prepares a Housing Monitoring Report based on the approved City of Burlington [Housing Strategy](#). This report provides detailed information about the state of housing within the

City based on current and future needs of residents and detailed information about available dwelling units.

However, the additional reporting requirements with quarterly reporting may require additional City financial and human resources to implement the requirements as well as address public concerns and questions.

Comments regarding Appendix 2: Proposed Amendments:

2. Allow municipalities to indicate when an application has been withdrawn.

Comment: City staff are supportive; this is a positive improvement to the data reporting requirements.

3. Make the registration of a plan of subdivision a “reportable action.” Currently, only applications that are submitted, decided, or appealed are required to be reported. This would make the registration a “reportable action.”

Comment: City staff are supportive, this is a positive improvement to the data reporting requirements, as it provides further insight into the process and timelines.

4. Make the registration of a plan of condominium a “reportable action.” Currently, only applications that are submitted, decided, or appealed are required to be reported. This would make the registration a “reportable action.”

Comment: City staff are supportive, this is a positive improvement to the data reporting requirements, as it provides further insight into the process and timelines.

5. Require municipalities to provide a summary table for each planning-application type with their quarterly reports.

Comments:

- Clarity and consistency need to be applied anytime that municipalities are asked to report on ‘approved housing units’. It is important to ensure that it is clear that each approval type is only one step closer (i.e. multiple planning and building approvals may be required) to achieving an actual housing unit as defined by CMHC. There is a need to ensure that the reporting on these ‘approved housing units’ aligns with and does not conflict with the units counted towards municipal housing targets, to avoid confusion and complications.
- To ensure that the proposed summary table aligns with all previous ‘reportable actions’, municipalities should also report on number of applications that are appealed to the Ontario Land Tribunal, and how long it took for those appeals to be resolved. It

would also be helpful to provide insight in the amount of time elapsed between municipal approvals being issued and actual construction of the housing units.

- Municipalities should be given flexibility in terms of how the planning application summary table is being generated and provided publicly, so that they are not bound by a rigid format type.
 - Municipalities should be given sufficient lead time in advance of these reporting requirements to allow them to develop the appropriate practices and procedures to report out data accurately.
6. Provide a copy of the municipality's geospatial data that identifies designated serviced land supply.

Comments:

- For two-tier municipalities where servicing is provided by upper-tier municipalities, ensure that the reporting requirements are directed to the appropriate tier that delivers the infrastructure.
- For Burlington, coordination between the City and the Region needs to be considered. Providing geospatial data that identifies designated serviced land supply should be consistent with Halton Region master planning and delivery of infrastructure.

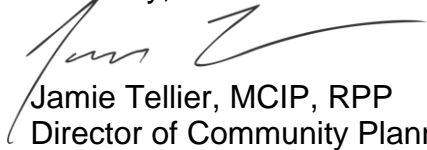
Recommendation

Staff recommend consideration of improvements to how data circulation is managed between municipalities and Land Registry Offices to assist municipalities in receiving accurate, most recent information regarding registration of a plan of subdivision/ condominium.

Next Steps:

Please accept this letter as the City of Burlington's submission on ERO posting 019-8368. Given the short period for consultation the comments have not been approved by City Council. This letter will be shared with the City's Committee's and Council at the earliest opportunity. Should Council determine any additional comments or refinements to these comments are required the Province will be advised at the earliest opportunity.

Sincerely,



Jamie Tellier, MCIP, RPP
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Community Planning Department
City of Burlington

