

May 10, 2024

Scott Sterling  
Planning Policy Branch  
Ministry of Municipal Affairs & Housing  
13th Floor, 777 Bay Street  
Toronto, ON  
M7A 2J3

***Re: Proposed Amendments to O.Reg. 73/23 – Municipal Planning Data Reporting***

Dear Mr. Sterling,

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide feedback on the Ministry of Municipal Affairs and Housing's proposed amendments to Ontario Regulation 73/23 – Municipal Planning Data Reporting (ERO 019-8368).

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions.

***OPPI Supports General Direction of Changes***

OPPI supports the general direction of the proposed changes to O.Reg. 73/23. Expanding the list of municipalities, enhancing what is required to be reported to include registrations of plans of subdivision and condominiums, and requiring summary tables to be posted on the municipality's website are all steps in the right direction towards more transparency and availability of planning-related data which supports documentation in and around achieving housing targets.

These changes will support more evidence-based planning and decision making in municipalities and provide other stakeholders or parties with inputs to support further research and analysis. For example, more consistent and accessible data across major municipalities on additional residential units (ARU) will help Councils make decisions on potential changes to their ARU guidelines to align with municipalities that have the highest uptake.

Additional reporting by municipalities will also help minimize discrepancies amongst studies including recent occurrences of competing analyses on the housing supply pipeline. A single consistent data source is crucial for all parties involved.

### ***OPPI Recommendations for Specific Improvements***

*Recommendation #1:* The province should maintain a central repository and require municipalities to submit full disaggregated data to be housed in the repository, instead of requiring municipalities to simply post summary data on their individual websites.

- A centralized repository with disaggregated data will maximize its usefulness for third parties. Truly open data promotes innovation and creates economic value through the development of better products that can support more evidence-based planning. For example, as zoning is being digitized, more products are being offered to municipalities, home builders, housing advocates, and other stakeholders that add value to internal decision making.
- The Province can leverage its [Open Data Catalogue](#) to host the datasets and continue to build on its open data directives for each Ministry to engage with stakeholders on how access and quality of data can be improved within their respective sectors.

*Recommendation #2:* The province should minimize burden on municipalities by providing dedicated funding to meet the collection and reporting obligations and prevent unnecessary duplication, where applicable.

- It is widely known that municipal planning departments have significant capacity challenges and a considerable divide in the quality and availability of data. In fact, OPPI has been advocating with multiple provincial ministries on measures to help address the shortage of planners in Ontario. To ensure additional resources can be retained to support the data collection and reporting requirements, the Ministry should provide dedicated funding for the initiative.
- The Ministry can also look to reduce burden by removing aspects of the reporting requirements where the data already exists within a provincial entity. For example, provincially initiated Minister's Zoning Orders can be reported by the Ministry of Municipal Affairs & Housing as it already has the relevant information supporting those Orders.

*Recommendation #3:* The province should ensure Municipal Property Assessment Corporation's (MPAC) assessment and parcel lot data is accessible for use by municipalities, researchers, and other stakeholders.

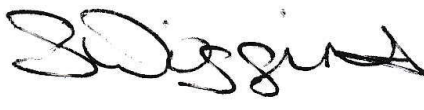

- In addition to municipal reporting on data, public agencies like MPAC have datasets that can add value to various parties and lead to more evidence-based analysis in planning. Availability of full assessment and parcel lot data in tandem with the data reported by municipalities can lead to more innovative products and generate further economic value.

Overall, OPPI supports the direction of the proposed changes and offers suggestions to increase use cases and economic value derived from this exercise in an effort to continue supporting and leveraging data sources which help to document, monitor, and manage municipal efforts to achieve provincial housing targets.

Thank you for the opportunity to provide feedback as the Ministry of Municipal Affairs & Housing considers changes to O.Reg. 73/23 – Municipal Planning Data Reporting.

If you have any questions or would like to setup a meeting to further discuss our submission, please contact OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Sincerely,



Claire Basinski, MCIP, RPP, CP3  
Chair

Susan Wiggins, CAE, Hon IDC  
Executive Director