



March 8, 2023

Legislative & Planning Services Department  
Planning Services  
1151 Bronte Road  
Oakville ON L6M 3L1

via ERO Website & Email

**RE: Municipal Reporting on Planning Matters**  
Proposed Minister's Regulation under the Planning Act (ERO No. 019-6619)

Thank you for the opportunity to provide input with respect to the Minister of Municipal Affairs and Housing's proposal to introduce a municipal data reporting regulation under the *Planning Act*. We understand that the intent of this regulation is to support measuring progress toward the goals set out in the Provincial government's Housing Supply Action Plan, including the new Municipal Housing Targets.

There are three municipalities in Halton Region that would be subject to the regulation as proposed – the City of Burlington, the Town of Milton and the Town of Oakville. While Halton Region is not explicitly identified as a municipality subject to the regulation, we have an interest in the reporting requirements related to water and wastewater infrastructure and in supporting our local municipal partners in planning for and monitoring growth.

Please see below our comments on the proposed regulation.

### 1. Regional Support for Reporting Requirements re: Water & Wastewater Infrastructure

The proposed data to be provided by the identified municipalities includes information on water and wastewater infrastructure. This includes information on existing and under construction trunk water and wastewater infrastructure as well as the locations of water and wastewater treatment plants. This information is to be provided on an annual basis in a form and format specified by the Ministry.

As noted above, Halton Region is not identified as a municipality to which the regulation would apply. However, Halton Region is the owner and operator of all municipal water and wastewater infrastructure located within the identified municipalities. Municipal services will be essential to accommodating the growth required to achieve the goals set out in the Provincial Housing Supply Action Plan. In this context, Halton Region has a direct interest in this aspect of the proposed regulation and has the following comments:

- A. The regulation or its supporting implementation materials should consider the role of upper-tier municipalities in providing information on regional water and wastewater infrastructure. While local municipalities have access to regional water and wastewater infrastructure data through existing data sharing agreements, in Halton's case, input from the Region would still be required in order to ensure the most up-to-date information on construction works in progress is provided, in addition to ensuring data accuracy and clear data source descriptions.

#### Regional Municipality of Halton

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- B. The proposal does not provide any details on how the required information related infrastructure will be used by the Province. We note that, on its own, the presence of pipes and/or facilities is not an indicator of immediate availability for development, especially given the integrated and complex nature of Halton's water and wastewater infrastructure network.

## 2. Clarifying the Purpose and Effect of the Municipal Reporting on Planning Matters

The proposal notes that the regulation would result in accurate and up to date information that could be used to measure progress toward the Housing Supply Action Plan and the overall objective of seeing the construction of 1.5 million new homes in Ontario by 2031.

- A. The Minister should identify and provide information on other data sources required to provide a complete and comprehensive picture of the factors that contribute to achieving the goals set out in the Housing Supply Action Plan. As has been noted elsewhere, there are many factors, in addition to municipal decision-making, that influence the amount and pace of housing construction. In order to fully understand the effectiveness of efforts to achieve the objective of building 1.5 million news homes, the Minister should clarify how the data reported by municipalities will fit within a more comprehensive monitoring and evaluation framework.

## 3. Concerns re: Effective Dates, Reporting Frequency, and Resource Impacts

The posting states that reporting planning application data would be required on a quarterly basis, beginning on June 30, 2023. In addition, information on planning boundaries and water and wastewater infrastructure would be required on an annual basis. The proposal states that the annual reporting requirements for 2022 would be on March 31, 2023.

- A. The Minister should clarify or revise the effective date for the initial annual reporting requirements (i.e., March 31, 2023). It is not clear how municipalities could realistically meet this requirement, given the extremely short timeline, other competing priorities, and the need for the guidance document referenced in the ERO posing which would provide detailed instructions and sample templates to support municipalities' responses.
- B. The Minister should reconsider both the effective date and the frequency of the municipal reporting requirements and consider concerns raised by Halton's local municipal partners in their submissions to the ERO. Municipalities, including Halton's local municipal partners, are currently focusing limited resources on responding to significant and successive changes to the planning system. While monitoring progress toward shared goals is absolutely important and should be advanced, the regulation as proposed has the potential to divert significant resources from the main goal of advancing housing supply.

This letter represents Halton Region's submission in response to ERO Posting No. 019-6619 on the Environmental Registry of Ontario. We would be pleased to discuss or provide further information on our submission as required and at your convenience.

Sincerely,



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