

# AMO's Submission to Municipal Reporting on Planning Matters – Proposed Minister's Regulation under the *Planning Act*

Comments to the Ministry of Municipal Affairs and Housing on ERO 019-6619 and 23-MMAH001

March 8, 2023

# **Table of Contents**

About AMO	3
Context	3
Municipalities Welcome Transparency & Continuous Improvement	3
The Importance of Telling a Complete Story	
Understanding the Current Data Systems	
Reporting Frequency	
The Estimated Level of Effort for Evidence-Based Decision-Making	
Open Data & Privacy	8
Conclusion	
Appendix A: AMO Comments on Minister's Regulation	

## **About AMO**

The Association of Municipalities of Ontario (AMO) is a non-profit, non-partisan association that has been representing the interests of municipal governments across Ontario since 1899. AMO addresses common challenges facing our members and provides meaningful advice to the government on practical solutions that meet the needs of all Ontarians.

AMO is actively involved in housing and homelessness advocacy because municipal governments play an important role in building strong, complete communities. In February 2022, AMO published a policy paper titled, "AMO's Blueprint for Action: An Integrated Approach to Address the Ontario Housing Crisis" to outline how all partners can work together to increase housing supply, diversify housing mix and increase affordability for all Ontarians. It was created in response to a lack of municipal representation on the province's Housing Affordability Task Force.

### Context

Since 2018, the province has fundamentally changed the land-use planning process in Ontario through the creation of three Housing Supply Action Plans. In October 2022, the province set a goal to build 1.5 million homes by 2031 and assigned 1.229 million of those homes to the 29 largest and fastest-growing lower- and single-tier municipalities in southern Ontario. The Ministry of Municipal Affairs and Housing (MMAH) have requested these municipalities submit a housing pledge on how they would achieve their assigned growth target by March 22, 2023.

Last month, MMAH released this regulatory proposal that will require these 29 municipalities to report specific planning-approval information quarterly, annually, as well as to provide five-year historical data from 2018-2022, inclusive for all datapoints identified.

To inform this submission, AMO has met with planning staff from all 29 municipalities, including the City of Toronto, to better understand what would be required to meet the expectations in this reporting regulation. The following comments reflect trends and patterns common throughout these discussions and provides recommendations for the province to consider as it moves forward.

## **Municipalities Welcome Transparency & Continuous Improvement**

100 percent of municipalities agreed that transparency and open data is important. There was also widespread agreement that continuous improvement is key which is why municipalities were appreciative of the Streamline Development Approval Fund (SDAF), and the extended timelines that were provided.

All municipalities have projects underway through the SDAF, which provides a roadmap for Ontario's largest, fastest-growing municipalities to improve their planning infrastructure and capacity to make truly effective changes for the process. For example, municipalities have used the SDAF to review their end-to-end development and planning application processes, hire consultants and in-house staff, and accelerating planning infrastructure upgrades to support modernization and digitization.

At the time of writing all municipalities had either submitted or were in the process of submitting their housing pledges. The willingness to take actions within a municipality's control to help meet their respective targets was a common theme throughout. However, the pledges also make clear

that municipalities' success will be contingent on having cooperation and funding from other orders of government, enough servicing capacity, and a robust development sector that can build the homes required.

All 29 municipalities are working within their sphere of influence to build communities for people to live, work and raise a family in. However, AMO is concerned that the reporting regulation in its current form will create a system that uses an incomplete dataset to tell an incomplete story.

## The Importance of Telling a Complete Story

The province's goal is to streamline the land-use planning system to make it faster to build housing and stop the 'planning carousel'. Municipalities welcome the opportunity to provide detailed comments in **Appendix A** as to what information would help track the province's intended outcomes, including some data points that are not currently listed. These include, but are not limited to, the time an application is:

- Waiting for developers and their consultants to submit complete applications after a preconsultation meeting, and between resubmissions (some municipalities reported an application requires 2 or 3 resubmissions on average, with additional resubmissions on more complex files)
- Waiting for comments from provincial line ministries, including the Ministry of Transportation and the Ministry of Natural Resources and Forestry, etc.
- Waiting for comments from external agencies, including railways, Metrolinx, Niagara Escarpment Commission, etc.

Additionally, most municipalities thought it was important to track:

- The time between the municipality having approved the application (either by council, the Ontario Land Tribunal, or staff through delegated authority), and when the developer pulls a building permit.
- The number of affordable units that are built given that councils are interested in the full spectrum of housing, not just market supply. AMO and its members are eager for the Minister's bulletin to be released to inform local metrics on increasing affordability.

Finally, many municipalities were confused as to how they will be expected to record the number of housing units built "as-of-right" as it is listed in the posting as required quarterly, but there is no data field included in the chart.

#### **AMO Recommendation #1:**

• That the province create metrics around these additional data points so that municipalities can report out publicly on the complete story and that MMAH balance the addition of these new data points by removing some that are currently proposed that do not add as much value (see Appendix A for details).

## **Understanding the Current Data Systems**

AMO found that none of the municipalities currently collect all of the information included in this regulation as part of their planning processes, despite what the posting suggests.

Even if municipalities were able pull the requested data, none of them felt it would be possible by the proposed timelines because data entry of new fields and checking to ensure accuracy would be required.

Approximately 65 percent of municipalities use the "Amanda" platform for building and/or planning processes, and all are various stages of customization and digitization. Many municipalities highlighted the use of "Amanda" strictly as it was intended, which is to manage workflow rather than function as a comprehensive database.

In addition to "Amanda", many rely on GIS, Bluebeam and Microsoft Excel programs that would require substantial efforts to comb through these datasets to provide this level of detail.

The remaining 35 percent of municipalities that do not use "Amanda" have systems including Accela, PLANit, Plan Trak, CityView, Cloudpermit, and Energov. Many municipalities are transitioning from old (sometimes paper-based) systems to new with thanks to the Streamline Development Approval Fund (SDAF).

AMO is also unclear how this proposal will work before the Data Standards for Development and Planning Applications are developed by the Ministry of Municipal Affairs and Housing and the Ministry of Public and Business Service Delivery. AMO is pleased to have municipal representatives actively participating on this muti-stakeholder working group and look forward to timely outcomes of the work.

#### AMO Recommendation #2:

 That the province accelerate the work of the Data Standards for Development and Planning Applications underway with the Ministry of Public and Business Service Delivery to ensure these projects complement these modernization efforts.

## **Reporting Frequency**

All municipalities AMO spoke with understood the need for transparent data; however, more time and a better understanding through the guidance material as to the details that are being requested will be required.

Of those, 93 percent of municipalities believed quarterly reporting was too burdensome at this level of detail.

None of the municipalities advised that assembling the historical data would be feasible by December 31, 2023, and questioned the time required and the affiliated outcomes. AMO recognizes that recent legislative changes (Bills 108, 109, 23, etc.) render historical data less relevant to the future of municipal planning as we all work together to build 1.229 million homes.

In addition to this work, many councils through their housing pledges have asked for additional reporting on metrics from staff uniquely suited to their municipality (e.g. affordable units, housing mix and type).

Given the planning and building staff shortages that municipalities are already facing, AMO recognizes that this work will require the redeployment of staff that are otherwise available to process development applications, implement SDAF projects, and meet their respective housing targets.

Based on these discussions, AMO is strongly encouraging the province not to expand this regulation to the remaining 415 municipalities in Ontario at this time.

#### AMO Recommendation #3:

- That the province reconsider the timelines associated with the reporting regulation in the following manner to allow for a more successful implementation: Remove the requirement for 5-year historical data.
- Instead of requiring quarterly data, request semi-annual data in June and December.
   Alternatively, extend deadline for first quarterly report from June 30, 2023 to September 30, 2023.
- Extend deadline for first annual reports from March 31, 2023 to September 30, 2023
- Remove the requirement for 5-year historical data.

**Note:** All recommended timelines are contingent on MMAH providing a guidance document including detailed instructions and sample templates to support municipalities.

# The Estimated Level of Effort for Evidence-Based Decision-Making

Over 90 percent of the 29 municipalities indicated that the proposal underestimated the cost of adhering to the regulation at \$3,953 for the first year and \$3,193 per municipality annually thereafter.

Of those, all felt that after upfront work was done, at significantly more than the amount proposed, ongoing work would be more manageable to report to MMAH on an annual basis. The cost associated with providing 5-year historical data was estimated to add weeks of time, not days.

The guidance document including detailed instructions and sample template to support municipalities will be incredibly important to prepare well in advance of the first timeline as it will help municipalities prepare the correct and accurate data. This will also help to identify how labour intensive this will be – particularly that the need for five-year historical data was estimated to add weeks of time, not days.

Note that where this work is already being done, it was identified as a role that is not appropriate for a junior planner and requires some intermediate knowledge of data, planning and development frameworks, as well as local applications. For some municipalities, multiple staff in multiple roles would be required to assemble this information, no matter what the frequency.

AMO has found through these discussions that multiple staff in multiple roles would be required to assemble this information, no matter what the frequency. All municipalities will need to allocate already limited municipal resources that would otherwise be available for development review functions, especially in small municipalities.

#### AMO Recommendation #4:

 That the province consider providing additional up-front funding to municipalities captured under this regulation and that MMAH work with the municipalities to develop a template to make it clear of what is being asked.

## **Open Data & Privacy**

All 29 municipalities agree that there should be effective reporting on planning matters to MMAH, and that data collected in this regulation should be available at an aggregate level to the public, including developers.

Similar to the other key municipal data collection tools, municipalities welcome the opportunity to share the data collected through this process, provided that it is collected:

- in a consistent manner; and,
- on the additional metrics that are laid out above that would tell the complete story.

Sharing this data publicly with the adequate context will go far in providing transparency and ground-truthing the ongoing theory that it is municipalities are in the bottleneck of applications and should be penalized for not meeting their housing growth targets since they are solely responsible for building homes.

Finally, some municipalities questioned whether there are information and privacy concerns affiliated with asking for this level of detail, as they mentioned that access to this information would require a Freedom of Information request.

#### **AMO Recommendation #5:**

- That MMAH champion open data for this proposal at an aggregate level.
- That MMAH confirm that the data being requested does not conflict with requirements under other legislative frameworks, including the municipal and provincial responsibilities under the *Municipal Freedom of Information and Protection of Privacy Act I Freedom of Information and Protection of Privacy Act*.

## Conclusion

Municipal planning departments are working hard to adapt to the fast pace of change. There are a finite amount of staff available to do this work in addition to meeting the legislated timelines set out under recent housing initiatives. There has been a lot of effort focused on identifying what flaws exist in municipal planning and development approvals, but the collaborative and iterative process to gain an approval is only part of the story.

Municipalities need developers to be at the table at all stages in the process – including providing complete submissions and resubmissions. Line ministries and external bodies also must provide timely input. Increasing the number of homes in the pipeline awaiting a permit to be pulled is a key priority to ensure that the province's housing goal can be reached.

Municipalities are supportive of reporting the whole and complete story in a way that does not undermine the larger objective of getting houses built. Ontario's largest, fastest-growing municipalities are getting their housing pledges in are ready to stand with the province to help meet its goal of building 1.229 million homes by 2031 but we cannot do it alone.

# **Appendix A: AMO Comments on Minister's Regulation**

#### **General Comments for Clarification:**

- Are the "number of housing units built as-of-right" on a quarterly basis referring to additional dwelling units?
- Are the geospatial data requirements required for the 5-year historical data?
- Development applications should be able to be reportable using a tabular format
- Are there information and privacy concerns affiliated with asking for this level of detail (some municipalities mentioned access to this information would require a Freedom of Information request)
- The province should consider asking for data that records the time waiting for developers and/or their consultants to submit complete applications after their pre-consultation meeting, and between resubmissions
- The province should consider asking for data that records the length of time the municipality is waiting for comments from provincial line ministries and external agencies

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
Community Infrastructure and Housing Accelerator Tool and Ministers Zoning Orders	<ul> <li>Number of building permits issued to date</li> <li>Downstream planning approval status</li> </ul>	Annual Reporting  Due by March 31 of the next calendar year (e.g., information for 2022 due March 31, 2023).	General: Some tracking systems do not currently track these or planning applications that follow an MZO or CIHA tool. Clarity is also needed on whether this is on new construction only.  Bullet #1: Clarify what is meant by "building permit" as some are enabling permits may be required that do not directly relate to new dwelling units (multiple per properties is also possible)  Bullet #2: What does this refer to and/or mean?
Land Severance (Consent)	<ul> <li>Application Number</li> <li>Application Address</li> <li>Date Application Submitted</li> <li>Date Application Deemed Complete</li> <li>Application Status         <ul> <li>Under Review</li> <li>Application Approved</li> <li>Application Refused</li> <li>If appealed to Ontario Land Tribunal or Local Appeal Body, whether it is an appeal of:</li></ul></li></ul>	Quarterly Reporting:  1. Q1: January 1 – March 31, due by June 30  2. Q2: April 1 – June 30, due by September 30  3. Q3: July 1 – September 31, due by December 31  4. Q4: October 1 – December 31, due by March 31 (of the next calendar year)	General: Clarity needed as consent applications be used to create a new lot, lot addition, mortgage or easements. Each take different times.  Bullet #5: Should add "adjourned to future meeting" to capture the actual status of these applications at the end of the reporting period.  #5a): Should add "By Who" in "Under Review"? Clarifying that will help tell the complete story.  #5d (i-4): Not all municipalities currently track this.

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
	<ul><li>Third Party Appeal</li><li>Date of Decision (if applicable)</li></ul>		
Minor Variance Application	<ul> <li>Application Number</li> <li>Application Address</li> <li>Date Application Submitted</li> <li>Date Application Deemed Complete</li> <li>Application Status         <ul> <li>Under Review</li> <li>Application Approved</li> <li>Application Refused</li> <li>If appealed to Ontario Land Tribunal or Local Appeal Body, whether it is an appeal of:</li></ul></li></ul>	Quarterly Reporting:  1. Q1: January 1 – March 31, due by June 30  2. Q2: April 1 – June 30, due by September 30  3. Q3: July 1 – September 31, due by December 31  4. Q4: October 1 – December 31, due by March 31 (of the next calendar year)	General: The requests here do not capture what is happening on the ground with these applications. Some are table at the request of the applicant to resolve an issue or concern. The application can be resolved but can take weeks or months depending. They also do not all lead to new units.  Bullet #5: Should add the type of application (S. 45(1) or (2)) as outcomes can be different. Should also add "adjourned to future meeting" to capture the actual status of these applications at the end of the reporting period.  #5a): Should add "By Who" in "Under Review"? Clarifying that will help tell the complete story.  #5d (i-iv): Some do not currently track this and would be required to research each application that is appealed.  #6a): Clarification is requested as to why this is needed if the outcome is to build housing (e.g. would capture changes such as adding a pool pump or garden shed).
Official Plan Amendment Applications	<ul> <li>Application Number</li> <li>Application Address</li> <li>Date Application Submitted</li> <li>Date Application Deemed Complete</li> <li>Application Status         <ul> <li>Under Review</li> <li>Application Approved</li> <li>Application Refused</li> <li>If appealed to Ontario Land Tribunal, whether it is an appeal of:</li></ul></li></ul>	Quarterly Reporting:  1. Q1: January 1 – March 31, due by June 30  2. Q2: April 1 – June 30, due by September 30  3. Q3: July 1 – September 31, due by December 31  4. Q4: October 1 – December 31, due by March 31 (of the next calendar year)	General: Looking for clarification that the province is only interested in OPAs that will result in residential developments.  Bullets #2 & 3: These are tracked in some larger systems but are not easily extractable and would take time. It also oversimplifies what is happening on the ground. Bill 109 requires an application "complete" or "incomplete" in two business days. However, there is nowhere to track whether that application has been perfected. It also doesn't reflect tabled applications, applications referred to staff or revised applications.  #5a: Should add "By Who" in "Under Review"? Clarifying that will help tell the complete story.  #5d (i-iii): Some do not currently track this and would be required to research each application that is appealed.  #6: Some do not track this detail.  #7: Some have this data but it is not easily extracted. Others questioned what is the proposed designation does not change but it relates to a specific policy standard.  #8: Several questioned what the relevance to this in an OPA

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
			and that several do not track this. Bill 109 and Bill 23 already changed this process to allow for the legal removal of heritage property if appealed.
Plan of Condominium	<ul> <li>Application Number</li> <li>Application Address</li> <li>Date Application Submitted</li> <li>Date Application Deemed Complete</li> <li>Application Status         <ul> <li>Under Review</li> <li>Application Approved</li> <li>Application Refused</li> <li>If appealed to Ontario Land Tribunal, whether it is an appeal of:</li></ul></li></ul>	Quarterly Reporting:  1. Q1: January 1 – March 31, due by June 30  2. Q2: April 1 – June 30, due by September 30  3. Q3: July 1 – September 31, due by December 31  4. Q4: October 1 – December 31, due by March 31 (of the next calendar year)	General: This oversimplifies what is happening on the ground. There are also four types of condos (standard, vacant land, leased, and common elements). Each type will have a different outcome. For example, common elements will result in 0 new units. Also missing the number of proposed units not subject to the plan of condominium (e.g. rental, co-op site plan applications wouldn't indicate the number of proposed units).  Often this is tied to another application (plan of subdivision, or site plan). How will the province avoid double counting? Will the template only request municipalities to report out on last planning application or will the template require them to be linked together?  Bullets 2 & 3: These are tracked in some larger systems but are not easily extractable and would take time. It also oversimplifies what is happening on the ground. Bill 109 requires an application "complete" or "incomplete" in two business days. However, there is nowhere to track whether that application has been perfected. It also doesn't reflect tabled applications, applications referred to staff or revised applications.  #5a: Should add "By Who" in "Under Review"? Clarifying that will help tell the complete story.  #5d (i-iv): Some do not currently track this and would be required to research each application that is appealed.  #6-8: Some do not track this detail and if they do it is difficult to extract.
Plan of Subdivision	<ul> <li>Application Number</li> <li>Application Address</li> <li>Date Application Submitted</li> <li>Date Application Deemed Complete</li> <li>Application Status         <ul> <li>Under Review</li> <li>Application Approved</li> <li>Application Refused</li> <li>If appealed to Ontario Land Tribunal, whether it is an appeal of:</li> <li>Condition</li> </ul> </li> </ul>	Quarterly Reporting:  1. Q1: January 1 – March 31, due by June 30  2. Q2: April 1 – June 30, due by September 30  3. Q3: July 1 – September 30, due by December 31  4. Q4: October 1 – December 31, due by March 31 (of the next calendar year)	General: This will take the majority time to track. This is missing part lot control applications and doesn't track the phases. For example, the plan of subdivision only asks for the number of proposed and registered lots but blocks are further divided. This means that new homes constructed that contribute to housing targets will be underestimated (e.g. number of proposed vs. draft approved units can differ and happen over multiple years).  Bullets 2 & 3: These are tracked in some larger systems but are not easily extractable and would take time. It also oversimplifies what is happening on the ground. Bill 109 requires an application "complete" or "incomplete" in two business days. However, there is nowhere to track whether that application has been perfected. It also doesn't reflect tabled applications, applications referred to staff or revised

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
	<ul> <li>Decision</li> <li>Non-decision</li> <li>Third Party Appeal</li> <li>Date of Decision (if applicable)</li> <li>Date Registered (if applicable)         <ul> <li>If registered, number of registered new residential lots</li> </ul> </li> <li>Proposed Use</li> <li>Proposed Number of Net New Residential Lots</li> <li>Heritage Status</li> </ul>		applications.  #5a: Should add "By Who" in "Under Review"? Clarifying that will help tell the complete story.  #5d (i-iv): Some do not currently track this and would be required to research each application that is appealed.  #6-10: Not all municipalities track this information and would require varying levels of effort to produce.  #7a): They can be registered in phases which is not captured here (e.g. one has had 13 phases since 1985).  #9: It underestimates the number of new units because it captures large lots but not the multiple dwellings within (e.g. in one over 40 percent of plans of subdivisions are townhomes, which are measured in blocks but actually mean 4-8 townhouses per block).  #10: Several questioned what the relevance to this as several do not track this. Bill 109 and Bill 23 already changed this process to allow for the legal removal of heritage property if
Site Plan Application	<ul> <li>Application Number</li> <li>Application Address</li> <li>Date Application Submitted</li> <li>Date Application Deemed Complete</li> <li>Application Status         <ul> <li>Under Review</li> <li>Application Approved</li> <li>Application Refused</li> <li>If appealed to Ontario Land Tribunal or Local Appeal Body, whether it is an appeal of:</li></ul></li></ul>	Quarterly Reporting:  1. Q1: January 1 – March 31, due by June 30  2. Q2: April 1 – June 30, due by September 30  3. Q3: July 1 – September 30, due by December 31  4. Q4: October 1 – December 31, due by March 31 (of the next calendar year)	appealed.  Bullets #3 & 4: Some municipalities would find this information hard to extract.  #5a: Should add "By Who" in "Under Review"? Clarifying that will help tell the complete story.  #5d (i-iv): Some do not currently track this and would be required to research each application that is appealed.  #6-7: Some municipalities would find this information hard to extract.
Zoning Bylaw Amendment Application	<ul> <li>Application Number</li> <li>Application Address</li> <li>Date Application Submitted</li> </ul>	Quarterly Reporting: 1. Q1: January 1 - March 31, due by June 30	<b>General:</b> The same issues apply with Official Plan Amendments. Some municipalities would require a manual process to ensure the units are not being double counted as there could be several applications on one property.

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
	Date Application Deemed Complete     Application Status     Submitted     Under Review     Application Approved     Application Refused     If appealed to the Ontario Land Tribunal, whether it is an appeal of:     Condition     Decision     Non-decision     Third Party Appeal      Date of Decision (if applicable)     Proposed Use     Heritage Status	2. Q2: April 1 – June 30, due by September 30 3. Q3: July 1 – September 30, due by December 31 4. Q4: October 1 – December 31, due by March 31 (of the next calendar year	Bullets 2 & 3: These are tracked in some larger systems but are not easily extractable and would take time. It also oversimplifies what is happening on the ground. Bill 109 requires an application "complete" or "incomplete" in two business days. However, there is nowhere to track whether that application has been perfected. It also doesn't reflect tabled applications, applications referred to staff or revised applications.  #5e (i-iv): Some do not currently track this and would be required to research each application that is appealed.  #6-8: Some do not track this detail and if they do it is difficult to extract.
Areas identified as a Strategic Growth Area with a minimum target	<ul> <li>A copy of the geospatial data identifying areas identified as a strategic growth area with a minimum target for your municipality. Indicate as part of the data attributes the applicable density targets, development phasing policies and other relevant policy or zoning requirements, where applicable and appropriate.         <ul> <li>Brief description of the data</li> <li>Date created</li> <li>Date updated (if newer)</li> <li>Update frequency (if applicable)</li> <li>Spatial referencing information (map projection, coordinate systems, geodetic model, geographic extent)</li> <li>List of data attributes and a data dictionary</li> <li>Data collection and process (if available)</li> <li>Data accuracy (e.g., the scale the data can be used at) (if available)</li> <li>Copyright information</li> <li>Indicate if boundaries are developed using Ontario Parcel Data, Ontario Road Network, or other data sources which may have separate copyright considerations.</li> <li>Contact information</li> </ul> </li> <li>Description of the file format (e.g., ESRI shapefile)</li> </ul>	Annual Reporting:  Due by March 31 of the next calendar year (e.g., information for 2022 due March 31, 2023).	General: Clarification is needed as to whether this refers to locally significant or those defined in the Official Plan. Some municipalities split this data between this and the one below, meaning it would make it difficult to compare year over year. Many questioned why this information is needed annually because they are long-term targets in an Official Plan that do not change often.  Many municipalities are interested in details on this data presentation request because they have geospatial data but not the attributes being requested.  Bullet #1(f-i): For some this type of data layer will not come with attributes and data dictionaries. The layout just includes properties.

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
Areas Subject to an Intensification Target	<ul> <li>A copy of the geospatial data identifying areas subject to an intensification target for your municipality. Indicate as part of the data attributes any applicable targets.</li> <li>Brief description of the data</li> <li>Date created</li> <li>Date updated (if newer)</li> <li>Update frequency (if applicable)</li> <li>Spatial referencing information (map projection, coordinate systems, geodetic model, geographic extent)</li> <li>List of data attributes and a data dictionary</li> <li>Data collection and process (if available)</li> <li>Data accuracy (e.g., the scale the data can be used at) (if available)</li> <li>Copyright information</li> <li>Indicate if boundaries are developed using Ontario Parcel Data, Ontario Road Network, or other data sources which may have separate copyright considerations.</li> <li>Contact information</li> <li>Description of the file format (e.g., ESRI shapefile)</li> </ul>	Annual Reporting:  Due by March 31 of the next calendar year (e.g., information for 2022 due March 31, 2023).	General: This information is set by a provincial regulation so municipalities questioned why this is being required. Clarification was also required as to how it relates to the data element directly above.  In at least one case, the municipality's Official Plan assigns targets to the entire urban area so the shape file would include the whole municipality.  Many municipalities are interested in details on this data presentation request because they have geospatial data but not the attributes being requested.  Bullet #1(f-i): For some this type of data layer will not come with attributes and data dictionaries. The layout just includes properties.
Employment Areas	A copy of the geospatial data identifying employment areas in your municipality. Indicate as part of the data attributes the applicable density targets, development phasing policies and other relevant policy or zoning requirements, where applicable and appropriate.      Brief description of the data     Date created     Date updated (if newer)     Update frequency (if applicable)     Spatial referencing information (map projection, coordinate systems, geodetic model, geographic extent)     List of data attributes and a data dictionary Data collection and process (if available)     Data accuracy (e.g., the scale the data can be used at) (if available)     Copyright information     Indicate if boundaries are developed using Ontario Parcel Data, Ontario Road Network, or other data sources which may have	Annual Reporting:  Due by March 31 of the next calendar year (e.g., information for 2022 due March 31, 2023).	General: Some wondered whether office is included in the definition of employment areas. Many municipalities questioned the need for this data given it is already in the Official Plan and its schedules that the province approves.  Many municipalities are interested in details on this data presentation request because they have geospatial data but not the attributes being requested.  Bullet #1(f-i): For some this type of data layer will not come with attributes and data dictionaries. The layout just includes properties.

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
	separate copyright considerations.  O Contact information  • Description of the file format (e.g., ESRI shapefile)		
Employment Area Conversions	A copy of the geospatial data identifying employment area conversions in your municipality.  Brief description of the data  Date created  Date updated (if newer)  Update frequency (if applicable)  Spatial referencing information (map projection, coordinate systems, geodetic model, geographic extent)  List of data attributes and a data dictionary  Data collection and process (if available)  Data accuracy (e.g., the scale the data can be used at) (if available)  Copyright information  Indicate if boundaries are developed using Ontario Parcel Data, Ontario Road Network, or other data sources which may have separate copyright considerations.  Contact information  Description of the file format (e.g., ESRI shapefile)	Annual Reporting:  Due by March 31 of the next calendar year (e.g., information for 2022 due March 31, 2023).	General: The impact of changing provincial policy and municipal comprehensive reviews will change responsibility for these. Municipalities questioned why this reporting is require if Official Plans do not allow for conversions until the next review process in 5-10 years.  Many municipalities are interested in details on this data presentation request because they have geospatial data but not the attributes being requested.  Bullet #1(f-i): For some this type of data layer will not come with attributes and data dictionaries. The layout just includes properties.
Existing water and wastewater infrastructure	A copy of the geospatial data for the existing and under construction water and wastewater trunk lines and locations of municipal water and wastewater treatment plants in your municipality.  Brief description of the data Date created Date updated (if newer) Update frequency (if applicable) Spatial referencing information (map projection, coordinate systems, geodetic model, geographic extent) List of data attributes and a data dictionary Data collection and process (if available) Data accuracy (e.g., the scale the data can be used at) (if available) Copyright information  Indicate if boundaries are developed using Ontario Parcel	Annual Reporting:  Due by March 31 of the next calendar year (e.g., information for 2022 due March 31, 2023).	General: Lower-tier municipalities mentioned that this data sits at the regional level as it is not a lower-tier function and the upper-tier municipalities are not compelled to give this information.  Some single-tier municipalities have trunk/sub-trunk line infrastructure identified in their Master Plans that can be pulled.  Bullet #1(f-i): For some this type of data layer will not come with attributes and data dictionaries. The layout just includes properties.

Data Element	Information for Collection	Frequency of Reporting	AMO Comments
	Data, Ontario Road Network, or other data sources which may have separate copyright considerations.  Contact information for Technical Questions  Description of the file format (e.g., ESRI shapefile)		
Major Transit Station Area Boundaries	<ul> <li>A copy of the geospatial data identifying major transit station area boundaries in your municipality. Indicate as part of the data attributes any applicable inclusionary zoning, density targets, development phasing requirements and other relevant policy or zoning requirements, where applicable and appropriate; and</li> <li>A copy of the geospatial data of any changes to major transit station area boundaries.</li> <li>For both items:         <ul> <li>Brief description of the data</li> <li>Date created</li> <li>Date updated (if newer)</li> <li>Update frequency (if applicable)</li> <li>Spatial referencing information (map projection, coordinate systems, geodetic model, geographic extent)</li> <li>List of data attributes and a data dictionary</li> <li>Data collection and process (if available)</li> <li>Data accuracy (e.g., the scale the data can be used at) (if available)</li> <li>Copyright information</li> <li>Indicate if boundaries are developed using Ontario Parcel Data, Ontario Road Network, or other data sources which may have separate copyright considerations.</li> <li>Contact information</li> </ul> </li> <li>Description of the file format (e.g., ESRI shapefile)</li> </ul>	Annual Reporting:  Due by March 31 of the next calendar year (e.g., information for 2022 due March 31, 2023).	General: Once these are set in an Official Plan, these are not looked at until a Municipal Comprehensive Review. Given these are generated by the province, municipalities are wondering why this information is needed.  Some do not have this data available because they are awaiting approvals from the province. Others wanted clarification as to whether it is referring to Protected MTSAs or more generally.  Bullet #1: If Inclusionary Zoning is already implemented, there is already a requirement to report every year. Some found this reporting detail to be a redundant process. Others wanted clarity on whether the province is asking for number of units only.  #3(f-i): For some this type of data layer will not come with attributes and data dictionaries. The layout just includes properties.