

**August 31, 2021**

Office of the Chief Digital and Data Officer and Deputy Minister  
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595 Bay St, Toronto, ON M5G 2C2



*Submitted electronically.*

**Re: Written feedback to Ontario's Data Authority consultation**

The Residential Construction Council of Ontario (RESCON) represents over 200 residential builders of high, mid, and low-rise buildings in the province, with a focus on the GTA. Our members build Ontario's communities, homes, and future. We are committed to providing leadership and fostering innovation in the industry through the following six core focuses: Training and Apprenticeship; Government Relations; Labour Relations; Health and Safety; Building Science and Innovation; Regulatory Reform and Technical Standards.

Thank you for inviting RESCON to participate in the Municipal Planning, Building, and Transportation Sectoral Data Table for the Data Authority Consultation. **Please consider the following letter as a supplement to the verbal commentary made during the Sectoral Data Table.** We'd like to expand on the following two themes as outlined in the consultation guide: Theme 2 (increasing access to high-value government data) and Theme 3 (improving data delivery).

The number of development applications continues to increase to meet housing demands yet constrained resources at the municipal approvals level act as a bottleneck in the ability of the private sector to deliver much-needed housing. RESCON and other organizations in the architecture, engineering and construction (AEC) community came to form the AECO Innovation Lab, an industry consortium to focussed on streamlining processes within the building industry. One of these processes that is core to the building industry is the development application and approvals process.

To build a new residential development in Ontario, whether it be a subdivision of homes or a high-rise condo, a planning and development application must be reviewed and approved by up to 45 different regulatory bodies, including municipal and regional governments, provincial ministries as well as applicable law agencies. Historically, these approval agencies (many of which operate at an arms-length from the province) and municipalities have relied on antiquated paper-based submissions and reviews, leading to further inefficiencies in the approvals process. This reliance on paper-based submissions in the development and building approvals process has further exacerbated approval timelines as the COVID-19 pandemic has led to remote work without the necessary tools in place to do their jobs efficiently.

Research has shown that Ontario could see thousands of additional housing units and attract millions of dollars in additional jobs and investment if the development approvals process was streamlined and digitized. The GTA alone could see up to 100,700 additional housing units by 2040 if there was a reduction in delays to the overall approvals process by just six months and a 10-per-cent increase in investment, according to a 2020 CANCEA report.

Digitization of the approvals process (more broadly referred to as e-permitting) is occurring within select Ontario municipalities; however, it is extremely siloed and fragmented and often only focus on a single department within a municipality. A data exchange platform is needed to enable systemic interoperability between disparate

applicable law organizations involved in the process regardless of their respective levels of technical sophistication.



AECO Innovation Lab's One Ontario initiative, is a proposal that has the backing of over 30 organizations engaged in the approvals process, including RESCON. One Ontario proposes the creation of a common Development Approval Data and Information Exchange Standard; a Central Review Platform; and Central Analytics and Reporting Platform for use by municipalities, Provincial Ministries, Conservation Authorities, and other approval agencies in Ontario for the development and permitting processes. To learn more about One Ontario, follow the link here: <https://www.oneontario.ca/>.

One Ontario addresses both Theme 2 and Theme 3 if adopted and implemented by the government. First, by digitizing the approvals process through a centralized hub, the province would be fostering better and greater data collection from agencies involved in the approvals process – again – many of which fall under the direct or indirect authority of provincial ministries (Theme 2). Development Approval Data and Information Exchange Standard and the Central Analytics and Reporting Platform portion of One Ontario would significantly improve access, communication, transparency and collaboration between approval agencies and the development industry (Theme 3).

As Ontario continues to grow and remains a top jurisdiction to live, new housing demand will continue to increase. Building a digital platform that allows for data standards, storage and review of applications all in a centralized hub will significantly streamline the approvals process and help deliver much needed housing faster.

Sincerely,

Richard Lyall  
President, RESCON

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