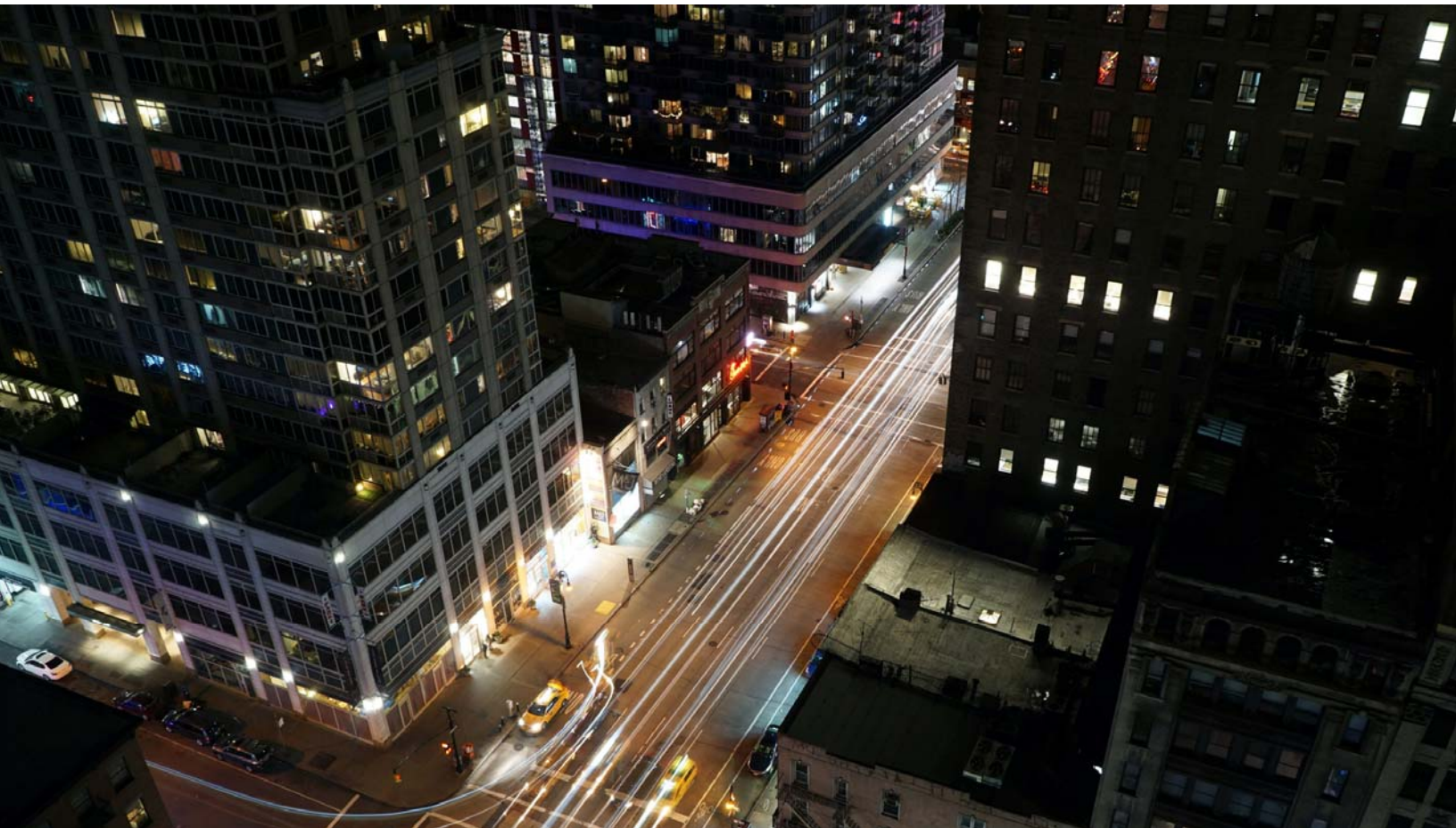
Municipal Benchmarking Study

Greater Toronto Area

2nd Edition
September 27, 2022



Greater Toronto Area Municipal Benchmarking Study - 2nd Edition

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EXECUTIVE SUMMARY

Altus Group Economic Consulting was retained by BILD to undertake a study of several factors that may be contributing to housing affordability issues in major housing markets across the Greater Toronto Area ("GTA"), such as municipal approval processes, resulting timelines for approvals, and government charges levied by municipalities.

The study compares approaches that municipalities have in place to deal with the approval and development of new housing. It also highlights key features (and associated benefits of those features) in promoting the approval of new housing and ultimate construction, as well as the cost implications of municipal processes and policies. The analysis presented in the study was based on research done on 16 municipalities across the GTA.

Key Finding: Affordability Concerns are Driving Regional Demographic Shifts

- Population growth in the GTA (the "region") in the latest 5-year period (2016-2021) has been slowing compared to prior periods. Net outflows from more expensive areas to less expensive parts of the region (or outside of the region altogether) have increased significantly;
- Many municipalities are seeing significant population declines in existing neighbourhoods, which puts significant additional emphasis on growth in 'designated' growth areas to not just drive population growth in a municipality, but also to offset population declines in 'stable' established neighbourhoods;
- Both the outflows of individuals to outlying areas of the region and declines in population in existing communities are largely from people aged 25-44 and persons under aged 19 migrating out of the more least affordable areas, such as the City of Toronto, Peel Region, and York Region; and
- The proportion of housing being constructed has increasingly become oriented towards apartments, with the current direction of planning policy likely to see the proportion of apartments within the total quantum housing supply continue to increase.

Key Finding: Municipal Processes and Requirements Contributing to Long Approval Timelines – May be Indicative of Broader Issue with Legislative Framework in Ontario

- Many municipalities have adopted a high percentage of identified tools and processes that are thought to help make the application process easier and more transparent for applicants. However, some municipalities still do not make important features of the process transparently

available, such as application requirements, terms of references for technical studies, or other key planning documents available to applicants, which can hinder the quality of submissions received, and can indirectly impact municipal review timelines;

- Many applicants are required to submit a wide array of technical studies, and while many are certainly necessary, our analysis has found up to 42 different possible types of studies over the range of municipalities studied. With even 10 to 20 studies being required per application, this can significantly increase the amount of time it takes to get to a complete application, adds complexity to municipalities reviewing the full submissions, and strains the resources of private-sector planning firms (and other technical experts) to fulfil application requirements;
- Municipal approval timelines in the GTA are among the worst of major municipalities across Canada and have deteriorated significantly compared to the findings presented in the previous the 2020 Study. Average timelines are 27% to 51% longer than those reported in the 2020 Study.

Figure ES- 1

Change in Average Approval Timelines by Type of Application

Application Type	2020 Study	2022 Study	% Change
	Months		Percent
Official Plan Amendment	16	24	51%
Zoning By-law Amendment	15	21	43%
Site Plan	15	20	35%
Plan of Condominium	9	11	27%
Plan of Subdivision	18	25	37%
Overall Weighted Average	15	20	40%

Source: Altus Group Economic Consulting

- Approval timelines range from 10 to 34 months depending on the municipality, with most types of applications (Rezoning, Site Plan, Plan of Subdivision) taking 20-24 months on average GTA-wide. Based on similar research undertaken for the CHBA Benchmarking Study (2nd Edition), average approval timelines in the GTA are higher than any other part of Canada;
- While there are some municipalities that are performing well and have improved, a worsening of approval timelines is seen in most municipalities studied - only three of the study municipalities saw improvement. Given Ontario municipality's performance relative to other

jurisdictions across Canada, the impediment to improving approval timelines may lie with the Province, as the system that municipalities are working within appears to be the main constraint; and

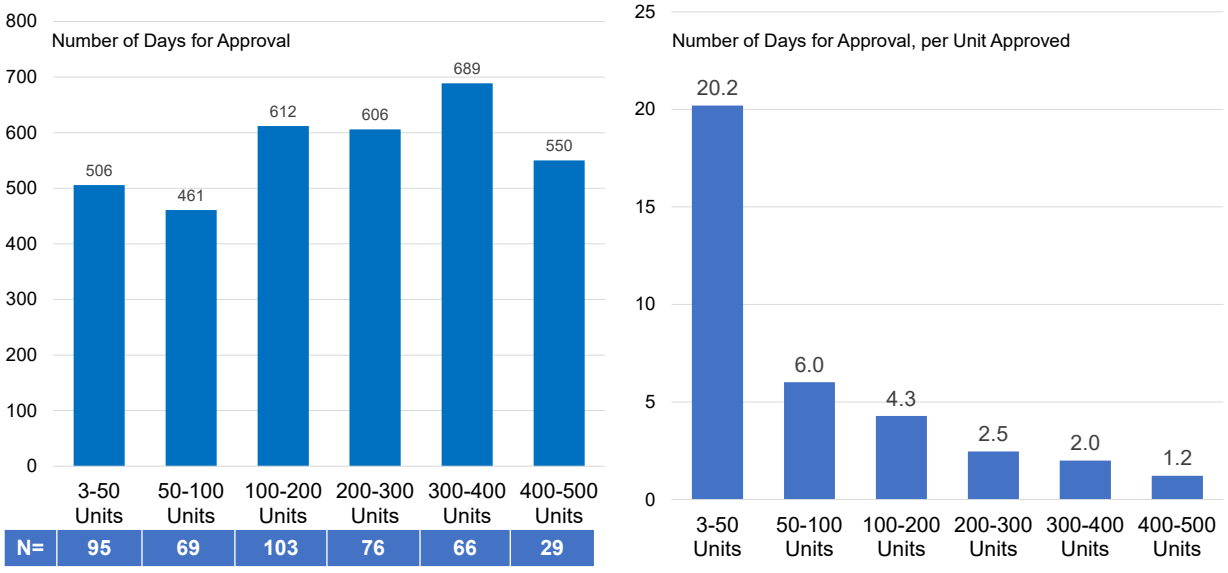
- The lack of development permit systems in Ontario and the GTA, which are permitted by Ontario's *Planning Act* would appear to be one significant difference in approach in the Province compared to the rest of Canada. Similarly, a relative lack of delegated authority is also evident when comparing Ontario to other jurisdictions outside of Ontario.

Key Finding: Little Time Savings Evident for Smaller Applications Puts Ability of Zoning Reform Initiatives to Deliver Needed Housing Supply at Risk

- Based on the data collected, there is little apparent difference in approval timelines for smaller applications (by unit count) compared to larger applications – the marginal amount of 'staff days per unit approved' is 5-10-times higher for smaller applications (3-50 units) than for larger applications;

Figure ES- 2

Average Timelines for Approvals, High-Density Development Projects, Ontario Municipalities



Source: Altus Group Economic Consulting

- Relying more on smaller development proposals to address housing supply issues, through initiatives such as those to up-zone stable neighbourhoods, secondary suites, etc., could have severe implications for municipalities and the staffing resources needed to review applications. To avoid overwhelming municipalities with smaller applications that take as long to review as larger applications without,

zoning reform to allow more fine-grained development in neighbourhoods will need to be matched with significantly streamlined processes for those applications;

- Otherwise, relying on increased staffing levels alone may not be sufficient. Since 2020, municipal staffing in planning departments have increased only marginally over the past two years despite the increase in application timelines. However, some municipalities (like many other sectors in the broader economy) are reporting high levels of vacant positions, with cost of living, compensation and intensity of the work environment cited as reasons why positions are hard to fill; and
- While changes may be necessary to ensure staff time is freed-up from a potential influx of smaller applications, recent changes that clawback planning application fees if statutory timelines are not met will negatively impact the ability of municipalities to fund planning departments and other related divisions (e.g., engineering, etc). Currently, only a tiny fraction of applications are approved within statutory maximums, suggesting that the clawbacks will have drastic impacts on a key funding source for municipal planning departments.

Key Finding: Municipal Charges Disproportionately Imposed on High-Density Developments Also Puts Objectives to Increase Infill and Intensification at Risk

- Municipal charges in the GTA continue to escalate significantly, increasing on average by 30-36% since our 2020 Study;
- Most charges – development charges, parkland dedication requirements, community benefits charges, and inclusionary zoning are significantly greater for high-density housing on a per square foot basis. Many charges directly stem from underlying land values (Parkland dedication charges, Community Benefit Charges), while others are indirectly set by land values (development charges);
- Municipal charges for low-rise housing amount to $53 per square foot, while charges for high-rise housing amount to $99 per square foot – municipal charges are nearly 2-times higher for high-density housing. This relationship is evident in every municipality studied, with the ratio of high-rise charges ranging from 1.5 to 2.4-times the charges per square foot levied on low-rise development. These ratios would be even higher if the costs associated with inclusionary zoning were included, as that initiative is currently applied to high-density housing only;

Figure ES- 3

Ratio of Municipal Charges per SF, Low-Rise vs High-Rise Scenarios

Rank	Municipality	Charges per SF: Low-Rise	Charges per SF: High-Rise	Ratio
		$ / Square Foot		*HR / LR*
1	Vaughan	76	152	2.0
2	Markham	73	139	1.9
3	Mississauga	65	132	2.0
4	Richmond Hill	58	127	2.2
5	City of Toronto	85	125	1.5
6	Caledon	57	109	1.9
7	Brampton	57	100	1.7
8	Milton	40	97	2.4
9	Oakville	51	93	1.8
10	Innisfil	46	88	1.9
11	Barrie	40	76	1.9
12	Burlington	41	75	1.8
13	Clarington	36	73	2.0
14	Whitby	43	72	1.7
15	BWG	35	67	1.9
16	Oshawa	38	58	1.5
	Average	53	99	1.9

Source: Altus Group Economic Consulting

- The influence of land values (both directly and indirectly) on municipal charges causes many of these charges to be the highest in more urbanized municipalities, and higher for high-density development. The seven highest municipal charges are found in the City of Toronto, the three York Region municipalities (Vaughan, Richmond Hill and Markham) and the three Peel Region municipalities (Mississauga, Brampton and Caledon). Relatedly, these are the areas where net outflow of persons to other parts of the GTA or outside of the GTA are the highest;
- Higher municipal charges (like escalating construction costs or other costs) increase the price 'floor' that units need to be sold at to be feasible for the developing landowner or home builder. If fewer units can sell at prices that cover increased costs, fewer units will get built; and
- The disproportionate costs per square foot in municipal charges to high density puts at risk municipal objectives for increased infill and intensification and could hinder utilization of public infrastructure investments in urbanized areas, such as major transit station areas, or transit corridors. As many municipalities in the GTA are largely built-out, greater costs for the high-density development will be counterproductive in trying to slow or stop the outflow of persons outside the region.

Summary of Rankings

The figure below summarizes the findings and associated rankings of each of the three major elements studied that feed into housing affordability – getting

housing approved expeditiously, ensuring submissions conform to municipal expectations (thereby improving the quality of submissions), and government charges that get borne by buyers/renters or otherwise may hinder the feasibility of constructing new housing.

The combined rankings should be used with some caution and should be interpreted as primarily being an indicator of the areas where there is both relative ease and cost-competitiveness in developing new housing.

Figure ES- 4

Combined Ranking - 2022 Municipal Benchmarking Study - Greater Toronto Area

		Rank by Category			
		Approval Timelines	Government Charges	Planning Features	
Rank	Municipality	*fastest to lowest*	*lowest to highest*	*most to least*	Total Score
1	Barrie	3	4	2	3.1
2	Oakville	5	9	3	6.0
3	Milton	1	7	10	6.1
4	Bradford West Gwillimbury	7	1	13	6.4
5	Oshawa	6	2	14	6.8
6	Brampton	4	10	6	7.0
7	Clarington	8	3	12	7.2
8	Burlington	12	5	7	7.7
9	Whitby	2	6	16	7.8
10	Mississauga	9	13	4	9.1
11	Innisfil	10	8	15	10.7
12	Toronto	15	15	1	10.8
13	Markham	11	14	8	11.3
14	Richmond Hill	14	12	9	11.7
15	Vaughan	13	16	5	11.8
16	Caledon	16	11	11	12.5
Weighting by Category		30%	40%	30%	

Source: Altus Group Economic Consulting

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1 INTRODUCTION

1.1 BACKGROUND & SCOPE OF STUDY

Altus Group Economic Consulting was retained by BILD to undertake a study of several factors that may be contributing to housing affordability issues in the Greater Toronto Area ("GTA").

The study looks at several factors including municipal approval processes, timelines for approvals, and government charges, as well as compares approaches across studied municipalities for dealing with the approval and development of new housing. This study aims to highlight key features and associated benefits in bringing new housing to approval and ultimate construction in a timely manner, so that the housing affordability crisis faced by many GTA municipalities can be alleviated.

1.2 APPROACH

1.2.1 Topics Covered

This report looks at several areas that have direct links to issues related to housing supply and/or housing affordability, including the costs of developing new housing, as well as the factors that impact the timeliness in which developers and landowners can bring new housing supply onto the market.

Figure 1-1

Subject Area	Approach
Demographic and Statistical Overview	Provide overview of trends in housing construction (tenure, form, prices), and shifts in population.
Analysis of Municipal Planning Approval Processes	Review of the features and tools utilized by municipalities to facilitate more efficient and transparent development processes.
Review of Municipal Charges Imposed on New Development	Using two hypothetical development scenarios, estimate the direct costs that municipalities levy on new housing developments, costs which are ultimately passed on to new home buyers (or renters) through higher prices (or rents).
Estimate of Municipal Approvals Timelines	Estimating the amount of time that development applications take to gain approval from municipalities from the complete application date (for the version decided upon, ignoring time associated

	with initial submissions sent back for adjustment) to final decision.
Analysis and Review of Best Practices	A high-level review of recent and ongoing initiatives that municipalities or Provincial governments are taking to streamline approvals processes, reduce costs of development, etc.

The section on municipal processes attempts to show how the structures of the provincial and municipal planning systems can and do impact approvals timelines. The municipal approval timelines section of this report analyses a robust sample of recent development approvals in studied municipalities across the GTA to understand what typical approval timelines are.

1.2.2 Geographic Scope

The study looks at the planning processes in a total of 16 municipalities in the Greater Toronto Area:

Figure 1-2

Region	Area Municipality
Toronto	City of Toronto
York Region	Vaughan, Markham, and Richmond Hill
Peel Region	Brampton, Mississauga, and Caledon
Halton Region	Oakville, Burlington, and Milton
Durham Region	Whitby, Oshawa, and Clarington
Simcoe Area	Barrie, Innisfil, and Bradford West Gwillimbury (or "BWG")

1.3 CAVEATS

The report looks at factors that may be contributing to housing affordability issues in the Greater Toronto Area, such as planning processes, demographic factors, government charges, timelines for gaining approvals for new housing, etc. However, while these factors all affect the timely and cost-effective delivery of housing supply, it is noted that these factors are not meant to represent an exhaustive list of factors that contribute towards housing affordability issues.

The information presented in this report is based on interpretation of various municipal policies, by-laws, rate schedules, etc. While every effort has been

made to interpret these materials accurately, there can be no certainty that municipal stakeholders will apply their policies and rates in the same manner as interpreted in this study.

The models at the core of this report frequently rely upon inputs and assumptions, such as assumed land values, estimated housing prices, and development yields from hypothetical development sites. These inputs and assumptions are intended for the purposes contained herein, and should not be used for any other purposes, or relied upon in any manner other than how they are used within this report.

The data presented in this report is based on the latest data available as of the writing of the report, but given the types of data used, the most recent iteration of data may vary from one chart, table, or figure to the next. For example, as of the time of writing of this report, CMHC data on housing starts was available to the end of 2021, while certain Statistics Canada Census data was available from the 2021 Census, while other data from the Census was only available from 2016.

2 MUNICIPAL DATA

This section provides a high-level overview of key demographic characteristics in the studied municipalities, and presents some key statistics related to housing development and affordability in these markets.

2.1 CENSUS DATA

2.1.1 Population Change

Figure 4 shows the population in each of the studied municipalities and the average annual change over Census periods since 2006. Every municipality studied (except Mississauga) has seen population increase in each five-year period since 2006.

The average annual change in population in these municipalities has been slowing, from average annual growth of 1.70% per year for the 2006-2011 period to 1.17% per year for the 2011-2016 period, and to 0.87% per year for the 2016-2021.

Population growth in absolute terms has also been declining with each subsequent five-year period:

- 2006 to 2011: +459,100 persons;
- 2011 to 2016: +340,850 persons; and
- 2016 to 2021: +268,060 persons.

Figure 2-3 **Population and Average Annual Population Change, Selected Municipalities, 2006-2021**

	Population				Average Annual Population Change		
	2006	2011	2016	2021	2006-2011	2011-2016	2016-2021
Municipality		*Persons*				*Percent Change*	
Burlington	164,415	175,779	183,314	186,948	1.35%	0.84%	0.39%
Oakville	165,613	182,520	193,832	213,759	1.96%	1.21%	1.98%
Milton	53,889	84,362	110,128	132,979	9.38%	5.48%	3.84%
Mississauga	668,599	713,443	721,599	717,961	1.31%	0.23%	-0.10%
Brampton	433,806	523,911	593,638	656,480	3.85%	2.53%	2.03%
Caledon	57,050	59,460	66,502	76,581	0.83%	2.26%	2.86%
Toronto	2,503,281	2,615,060	2,731,571	2,794,356	0.88%	0.88%	0.46%
Vaughan	238,866	288,301	306,233	323,103	3.83%	1.21%	1.08%
Richmond Hill	162,704	185,541	195,022	202,022	2.66%	1.00%	0.71%
Markham	261,573	301,709	328,966	338,503	2.90%	1.74%	0.57%
Whitby	111,184	122,022	128,377	138,501	1.88%	1.02%	1.53%
Oshawa	141,590	149,607	159,458	175,383	1.11%	1.28%	1.92%
Clarington	77,820	84,548	92,013	101,427	1.67%	1.71%	1.97%
Bradford West Gwillimbury	24,039	28,077	35,325	42,880	3.15%	4.70%	3.95%
Innisfil	31,175	33,079	36,566	43,326	1.19%	2.02%	3.45%
Barrie	128,430	135,711	141,434	147,829	1.11%	0.83%	0.89%
Total	5,224,034	5,683,130	6,023,978	6,292,038	1.70%	1.17%	0.87%

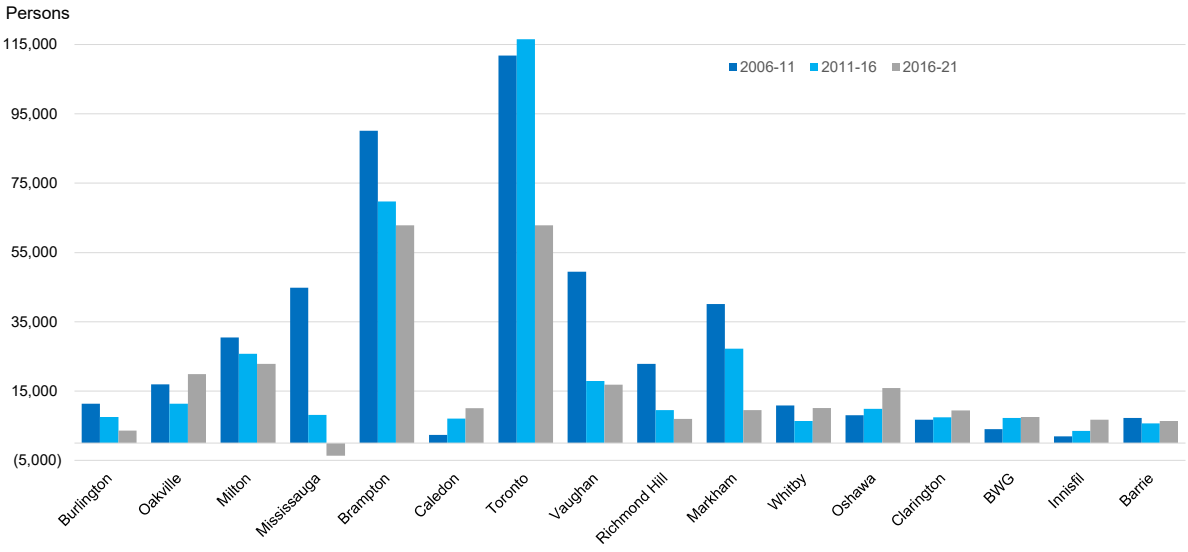
Source: Altus Group Economic Consulting based on 2006, 2011, 2016 and 2021 Census Data

Out of the 16 GTA municipalities studied, Caledon, Oshawa, Clarington and Innisfil saw increased rates of growth in each successive five-year period between 2006 and 2021.

Seven municipalities saw a decrease in population growth rates in each successive five-year period (Burlington, Milton, Mississauga, Brampton, Vaughan, Richmond Hill, and Markham). Of these municipalities with slowing growth rates, the City of Mississauga saw its population decline in absolute terms over the 2016-2021 period, the only major GTA municipality in Ontario to see a population decline in that five-year period.

Figure 2-4

Population Growth by 5-Year Census Period, 2006-2021



Source: Altus Group based on Census Data

It was found that the rates of municipal population increase over the 2006-2021 period is negatively correlated with the share of apartment unit housing starts. Many largely 'built-out' municipalities like Toronto and Mississauga have seen the populations in existing low-density neighbourhoods decline so significantly that large proportions of the growth occurring in designated growth areas (Urban Growth Centres, Major Transit Station Areas, etc.) is required just to maintain population levels in the municipality. The issue of neighbourhood-level population decline is covered in more detail in a later section (2.1.4) of this report.

While population growth in the GTA appears to have slowed considerably, other urban parts of Canada are seeing continued and increased growth rates. In other major Canadian municipalities outside of the GTA (as covered

by our associated Municipal Benchmarking Study for CHBA[1]), absolute population growth has been increasing with each subsequent five-year period:

- 2006 to 2011: +193,740 persons;
- 2011 to 2016: +200,370 persons; and
- 2016 to 2021: +228,750 persons.

2.1.2 Average Household Size

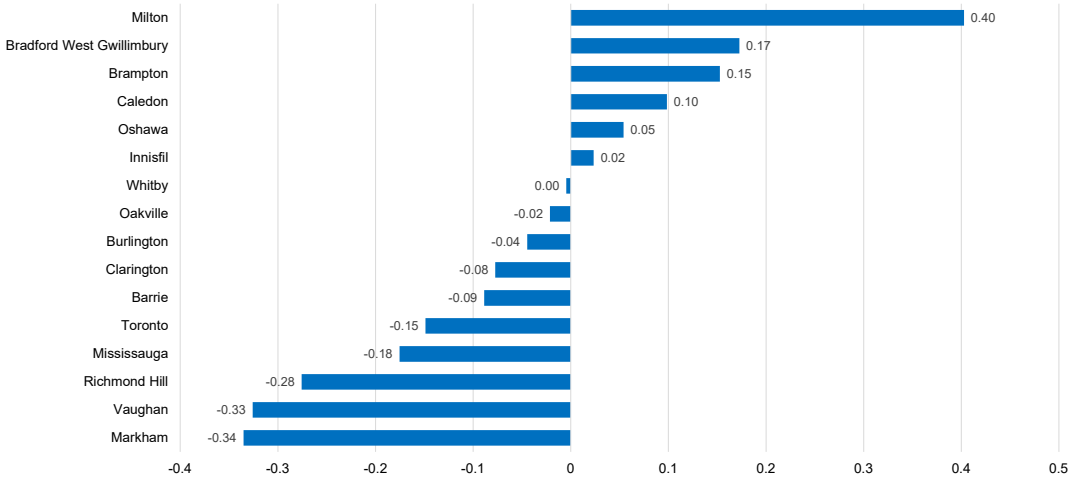
Figure 2-5 shows the change in average household sizes in the municipalities that were examined between 2006 and 2021.

In many of the municipalities that were studied, the average household size declined over the period between 2006 and 2021, significantly so in some cases. However, the average household size increased in six (6) of the 16 municipalities, including Milton (+0.40 persons per unit), BWG (+0.17) Brampton (+0.15), Caledon (+0.10), Oshawa (+0.05) and Innisfil (0.02).

Figure 2-5

Change in Average Household Size, 2006-2021

Persons per Unit



Source: Altus Group based on 2016 and 2021 Census data

In the other 10 municipalities, there were slight-to-significant declines in average household size, with significant declines recorded in Toronto and Mississauga. The largest declines were observed in the three York Region municipalities studied (Markham, Vaughan, and Richmond Hill) with declines of 0.34, 0.33 and 0.28 persons per unit respectively. This change is likely driven by a combination of increased emphasis on apartment units in the

[1] The non-GTA municipalities covered by the GTA: St. John's, Halifax, Moncton, Charlottetown, Ottawa, London, Winnipeg, Regina, Saskatoon, Calgary, Edmonton, Surrey, Vancouver and Burnaby.

overall housing mix in these municipalities and declining household sizes in existing maturing and older lower-density neighbourhoods.

2.1.3 Migration Data

Using Statistics Canada data on migration, this study analyses the sources of population change within the upper-tier (or single-tier) municipalities in the GTA. Beyond natural life factors that affect population (such as births and deaths), there are four key flows of people into and out of municipalities and regions:

- **Net Intraprovincial migration** - persons moving in/out of the municipality or metropolitan area, but staying within the same province;
- **Net immigration** - persons arriving from outside of Canada (as permanent residents) minus persons that were living in Canada, and are now leaving the country;
- **Net Interprovincial migration** – the net number of persons moving from one province to a region in another province;
- **Net non-permanent residents** – net inflow or outflow of persons moving to or from Canada, such as temporary workers, students, etc.

For example, over the 10-year period ending mid-year 2021, the City of Toronto observed several distinct movements of population in and out of the City:

- A **net outflow** of 298,400 people that left the City to move to other parts of the province of Ontario (intraprovincial migration);
- An **additional** 381,500 people residing in the City from net immigration (persons coming to reside in the City from outside of Canada);
- A **net inflow** of approximately 17,300 people moving to reside in the City from interprovincial migration – persons moving to the City from other places in Canada outside of Ontario; and
- An **additional** 83,900 net new non-permanent residents (comprised of international students, temporary workers, etc.).

Combined, these four factors contributed to population growth within the City of Toronto, and also demonstrates that the City has been fully reliant on inflows of people from other parts of the world (total net gain of 465,500 persons combined) and other parts of Canada (net gain of 7,300 from other Provinces) to offset the significant net outflows of Toronto residents to other parts of Ontario (loss of 298,400 persons).

Figure 2-6

Migration by Census Division, 2011-2012 to 2020-2021, Ranked by Net Intraprovincial Migration

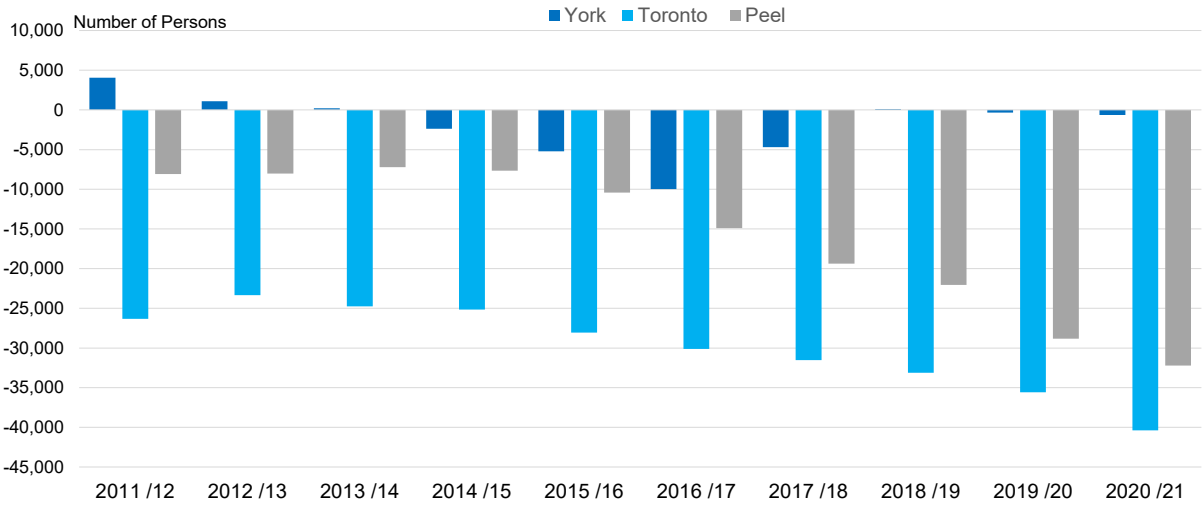
Census Division	Net Intraprovincial Migration (within Ontario)		Net Immigration (International)		Net Interprovincial Migration (within Canada, outside Ont.)		Net Non-Permanent Residents		Total	
	Amount	Rank	Amount	Rank	Amount	Rank	Amount	Rank	Amount	Rank
	Persons		*Persons*		*Persons*		*Persons*			
Simcoe County	82,010	1	5,233	6	(7,929)	5	6,114	4	85,428	4
Durham Region	64,069	2	19,164	5	(7,923)	4	5,711	5	81,021	5
Halton Region	42,124	3	34,330	4	(118)	2	3,990	6	80,326	6
York Region	(17,809)	4	94,929	3	(467)	3	11,789	3	88,442	3
Peel Region	(158,707)	5	254,216	2	(9,891)	6	75,312	2	160,930	2
Toronto	(298,403)	6	381,522	1	17,303	1	83,932	1	184,354	1

Source: Statistics Canada, 2020-2021 Annual demographics

Factors contributing to negative net intraprovincial migration or a significant outflow of persons from a municipality to other parts of a province may include a lack of desired housing options in a municipality or the unaffordability of the housing options that are available. Of the six regions within the GTA, three (Toronto, Peel and York) experienced net outflows of residents to other parts of Ontario, significantly so for Toronto and Peel. In these three regions, the net number of persons leaving the regions for other parts of Ontario has been increasing.

Figure 2-7

Annual Net Intraprovincial Migration- Toronto, Peel and York
2012-2021



Source: Altus Group based on Statistics Canada, Annual Demographic Estimates, 2020-2021

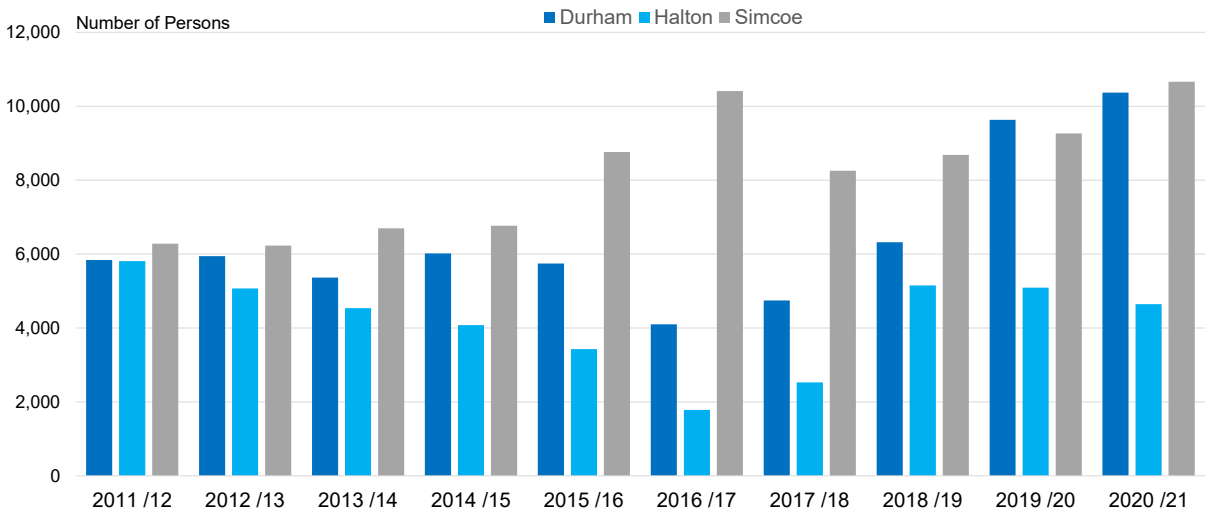
Of the GTA municipalities studied, between 2012 and 2021, Simcoe County, Durham and Halton Regions saw inflows of people from elsewhere in the province:

- The **net inflows** in Halton remained positive, and have generally remained within a range of 4,000 to 6,000 persons per year (except for three years between 2016 and 2018);
- The **net inflows** into Durham have increased significantly in the past three years, exceeding 6,000 persons in 2018, and approaching 10,000 persons per year in 2020 and 2021;
- The **net inflows** into Simcoe increased significantly starting in 2016, exceeding net inflows of greater than 8,000 persons, and meeting that mark each of the five years since.

Figure 2-8 shows the annual Intraprovincial trends for Halton, Durham and Simcoe.

Figure 2-8

Annual Net Intraprovincial Migration- Halton, Durham, Simcoe
2012-2021



Source: Altus Group based on Statistics Canada, Annual Demographic Estimates, 2020-2021

To understand the nature of the Intraprovincial flows to/from the six GTA regions to/from other parts of Ontario, Figure 2-9 below shows Intraprovincial migration for persons aged 25-44 years, for the ten-year period ending mid-2021.

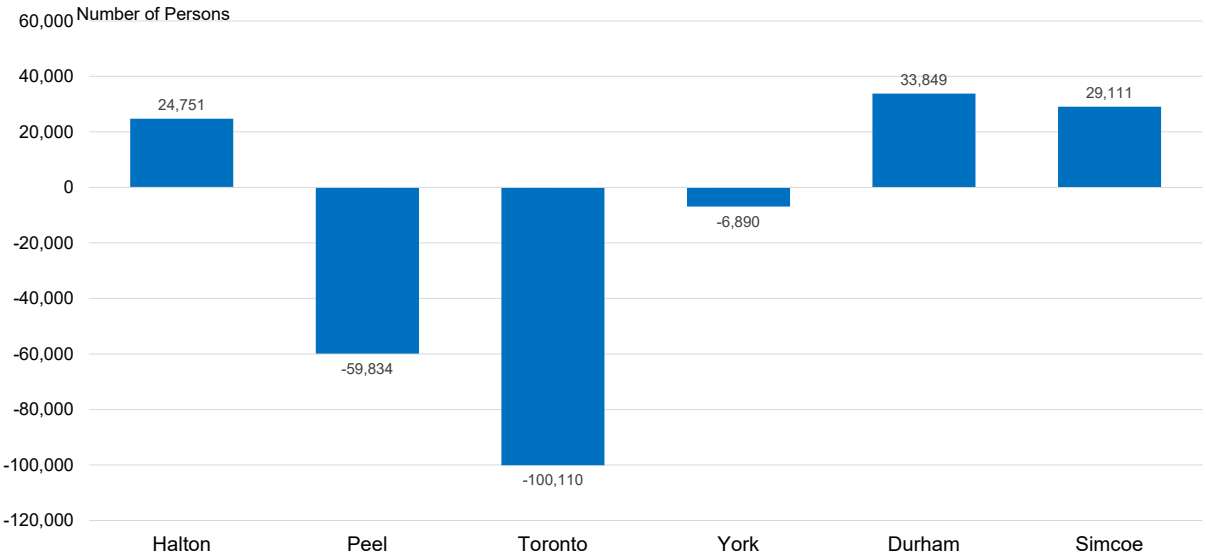
Net outflows seen in some GTA municipalities, such as Peel, York and Toronto are driven by persons in the 25-44 years age cohort. Net inflows are observed in some municipalities, such as Halton, Durham and Simcoe, that are gaining persons in this age group from other parts of the province, with a significant proportion likely coming from nearby places such as Peel, York and Toronto.

The data appears to indicate that a lack of housing, that is both affordable and suitable for families, is resulting in younger families (and their children)

leaving the inner parts of the metropolitan areas (Toronto, Peel, York) that generally have higher prices, for areas with more affordably priced and suitable housing options for younger families.

Figure 2-9

Intraprovincial Migration for Age Group 25-44, *2012-2021, Greater Toronto Area*



Source: Altus Group based on Statistics Canada, Annual Demographic Estimates, 2018-2019

2.1.4 Neighbourhood Level Population Declines

Many existing low-density neighbourhoods in the GTA are seeing significant population declines, with these declines putting greater emphasis on growth in other areas of municipalities such as Urban Growth Centres and Major Transit Station Areas.

As an example, of the City of Mississauga's 136 Census Tracts ("CTs"), 101 CTs saw a decline in population over the 2016-2021 period, while only 35 CTs saw growth. Of the 35 CTs that saw population growth, only three (3) saw population growth greater than 500 persons.

Figure 2-10

Category of CT, City of Mississauga	Number of Census Tracts	Share of City Land Area	2016 Population	2021 Population	Change	% Change
CTs with Growth >500 persons	3 CTs	1.0%	17,904	26,151	+8,247	+46.1%
CTs with Growth 1-500 persons	35 CTs	18.2%	167,731	172,276	+4,545	+2.7%
CTs with Population Decline	109 CTs	80.8%	535,964	519,534	-16,430	-3.1%
Total	147 CTs	100.0%	721,599	717,961	-3,638	-0.5%

A similar pattern is seen in the City of Toronto, where 57% of the CTs in the City (representing 53.6% of the City's land area) saw a population decline, with a loss of approximately 55,600 persons over just a five-year span.

Figure 2-11

Category of CT, City of Toronto	Number of Census Tracts	Share of City Land Area	2016 Population	2021 Population	Change	% Change
CTs with Growth >500 persons	65 CTs	10.6%	350,934	443,560	+92,626	+26.4%
CTs with Growth 1-500 persons	185 CTs	35.8%	817,492	843,111	+25,619	+3.1%
CTs with Population Decline	335 CTs	53.6%	1,563,145	1,507,685	-55,640	-3.5%
Total	585 CTs	100.0%	2,731,571	2,794,356	+62,785	+2.3%

In total, the Toronto Census Metropolitan Area ("CMA")[2] saw a total of 650 CTs decline in population out of a total of 1,227 CTs that make up the CMA. Of the 650 CTs with declining population, roughly 68% of these were in the City of Toronto (335) and the City of Mississauga (109) combined.

To show this trend seen in many urban neighbourhoods in more detail, the graph below shows the steady population of one example Census Tract[3] in Downtown Toronto, which saw its population decline by 32% over a 40-year

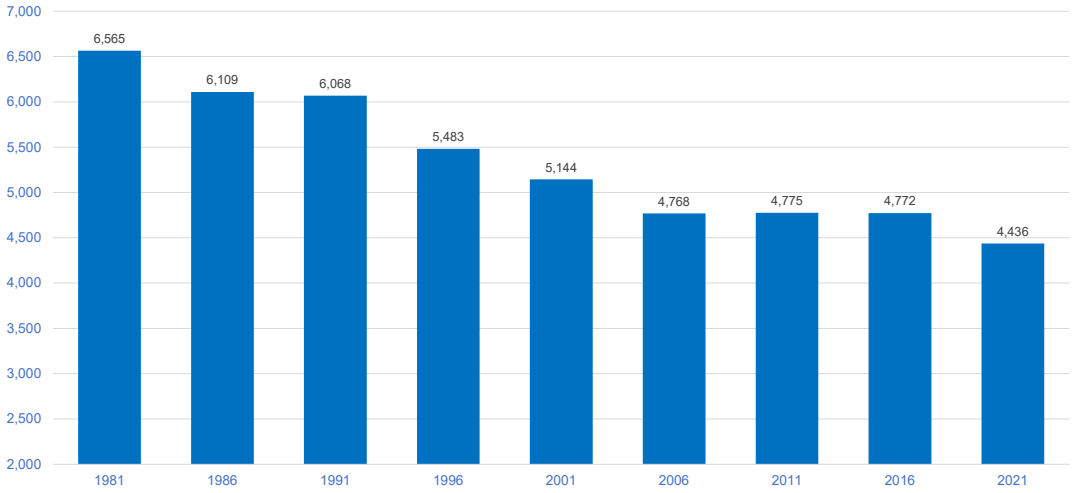
[2] A Census geographic boundary area formed by several municipalities that surround the City of Toronto, which includes the city itself. See Statistics Canada for the specific boundary area.

[3] CT 5350056.00, bound by Bloor Street West to the north, College Street to the south, Grace Street to the east and Ossington Avenue to the west. The number of occupied dwelling units in the CT was 1,900 units in 1991, and 1,960 units in 2021.

period from 1981 to 2021. It declined from a population of 6,565 persons in 1981 to 4,436 persons in 2021, a loss of 2,129 persons, or 53 persons per year on average. The population density of this CT has fallen from 129 persons per hectare to 87 persons per hectare.

Figure 2-12 Profile of Neighbourhood Population Change, 1981-2021

City of Toronto, CT 5350056.00

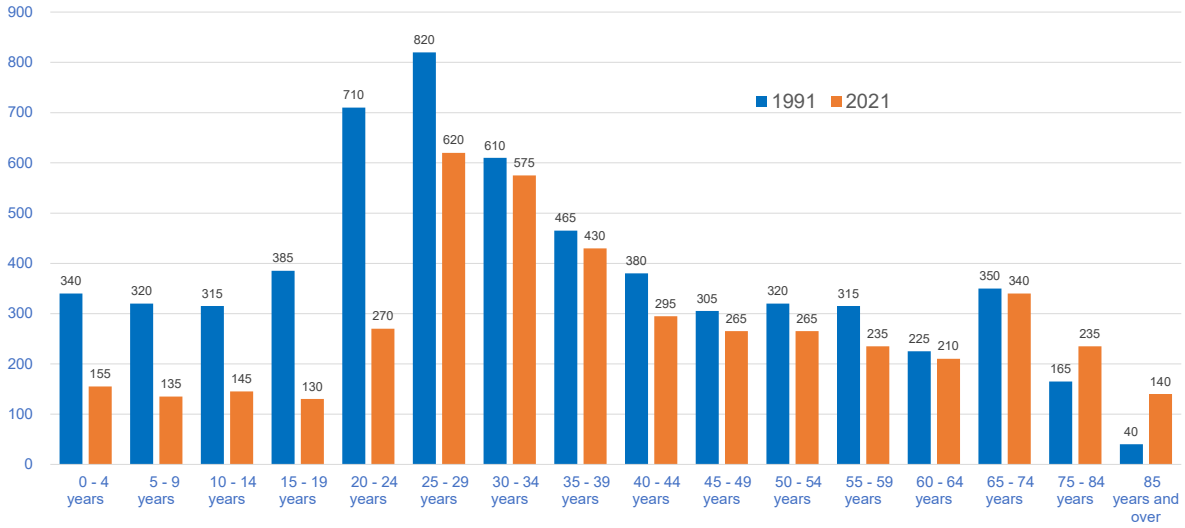


Source: Altus Group based on Census data

Similar to the overall trends seen in Intraprovincial outflows for the City of Toronto as a whole, the decline in population for the example CT neighbourhood appears to be particularly significant for persons aged 0-14 years and 25-44 years. In the CT example (using 1991-2021 data), there was nearly a 60% decline for the number of persons aged 0-24 years. Whereas in 1991 there were 2,070 persons in the 0-24 year age cohort, by 2021 there were just 835 persons in this age group. Older adults have also seen declines, but at lower rates than the younger cohort (-16% for ages 25-44 years and -16% for ages 45-64 years) while the cohort for seniors has increased significantly (+29% for ages 65+ years).

Figure 2-13 **Profile of Neighbourhood Population Change, by Age Group, 1991-2021**

City of Toronto, CT 5350056.00



Source: Altus Group based on Census data

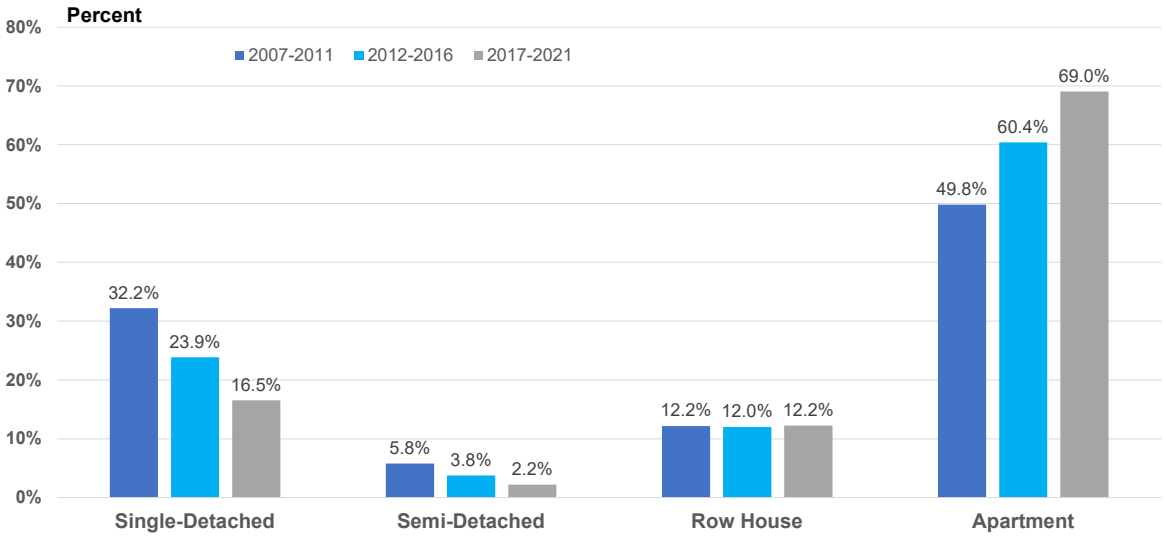
2.2 HOUSING STARTS

2.2.1 Housing Starts by Dwelling Type

Figure 2-14 shows how housing starts by housing type has changed in the municipalities examined over the past 15 years, as broken out into separate five-year periods.

Figure 2-14 **Change in Housing Starts by Structure Type**

Selected Municipalities, 2007-2021, by 5-Year Period



Source: Altus Group based on CMHC Housing Starts data

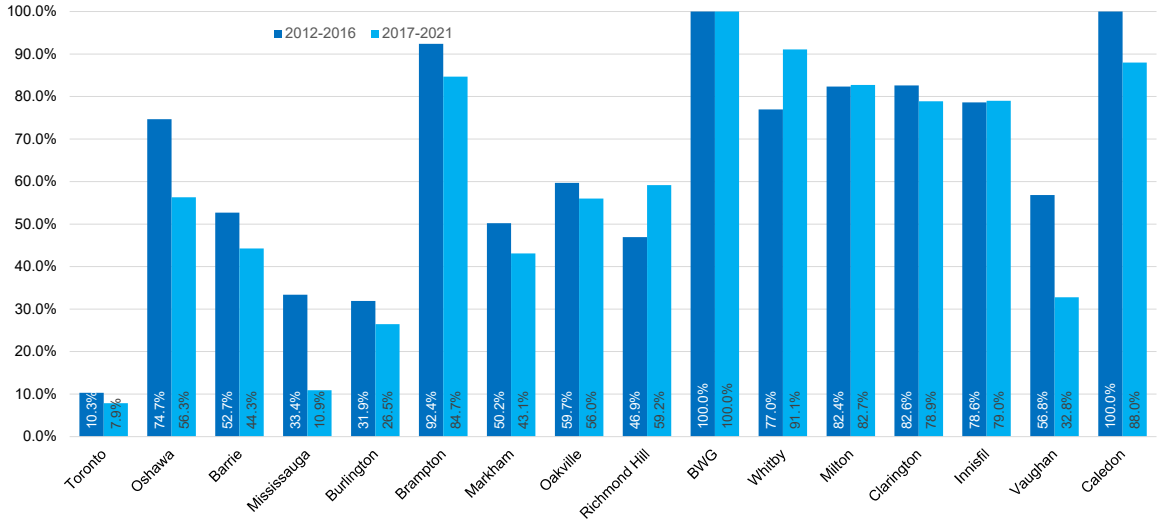
Over the time-period of examination, there has been an increasing proportion of housing starts in higher density forms such as apartments, while the share of lower density housing forms (single-detached and semi-detached) has declined. Only 18.7% of the total housing starts in the municipalities examined over the most recent five-year period (2017-2021) were single-detached or semi-detached units.

A comparison of the most recent five-year period (2017-2021) to the prior five-year period (2012-2016) shows that 12 out of the 16 municipalities studied observed declines in the share of ground-related housing starts (see Figure 2-15). Municipalities that recorded an increase in share of ground-related housing include Richmond Hill (increase from 46.9% to 59.2%), Whitby (increase from 77% to 91.1%), as well as marginal increases in Milton and Innisfil. The share of ground-related housing in Bradford West Gwillimbury remained unchanged, at 100% in both periods.

Figure 2-15

Change in Share of Ground-Related Housing Starts by Municipality

2012-2016 vs. 2017-2021



Source: Altus Group based on CMHC Housing Now data

2.2.2 Housing Starts by Tenure

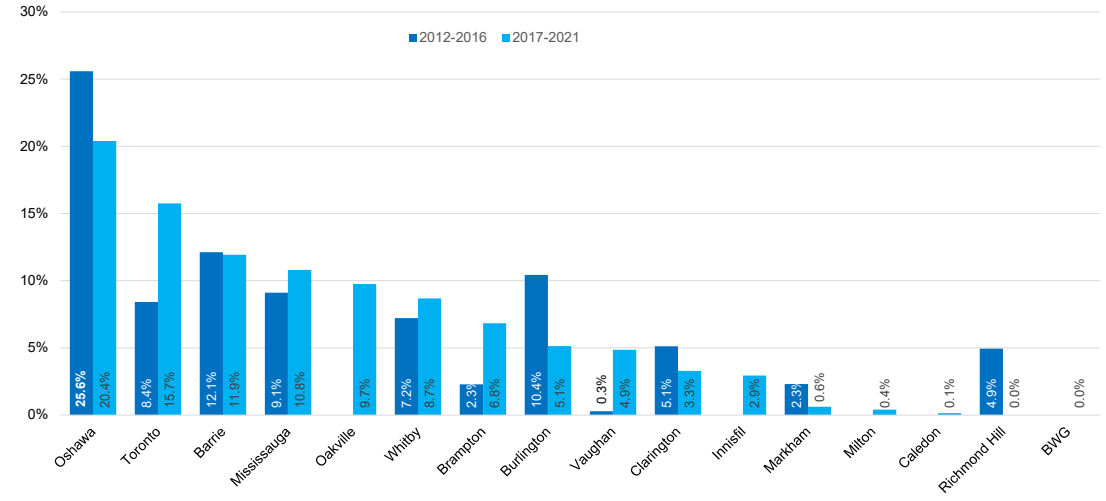
An analysis of the tenure of occupied dwellings shows that despite the number of renter households increasing, there has been a lack of purpose-built rental housing construction in the Greater Toronto Area, with only four municipalities seeing more than 10% of new housing starts as purpose-built rental in the last five years - with Oshawa recording the largest share at 20.4% of all housing starts.

Eight (8) of the 16 municipalities studied saw less than 5% of housing starts as rental tenure.

Figure 2-16

Change in Share of Rental Tenure Housing Starts by Municipality

2012-2016 vs. 2017-2021



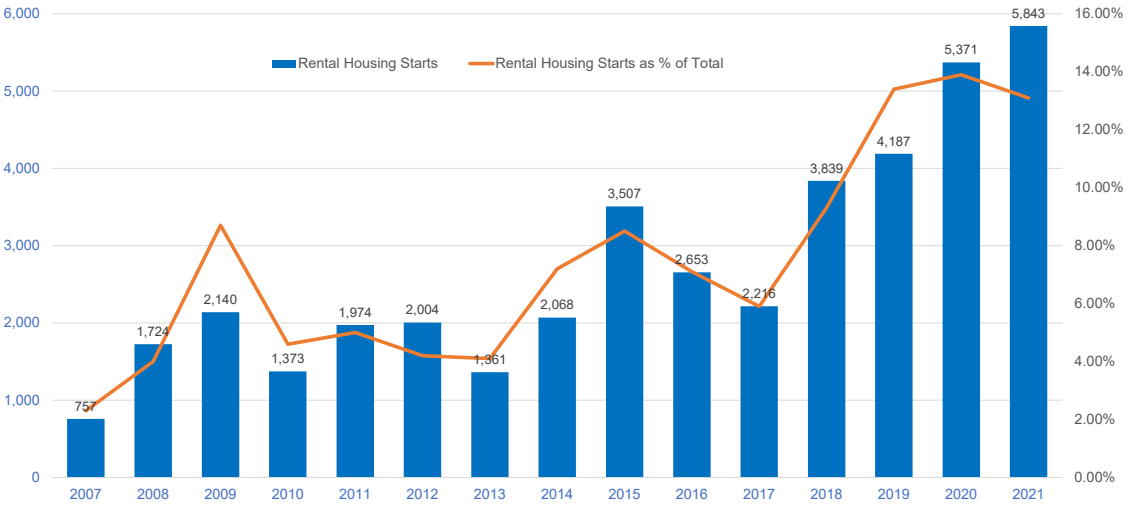
Source: Altus Group based on CMHC Housing Now data

Across the 16 municipalities combined, the number of rental housing starts increased by 85% from the 2012-2016 period to the 2017-2021 period. However, on average rental housing starts comprised of just 11.1% of all housing starts over the past five-years, although that share was higher than the 6.2% share of rental housing in the prior five-year period. Rental housing starts in 2021 comprised 13.1% of all housing starts, after reaching 13.9% in 2020 and 13.1% in 2019, which are respectively the three highest shares of purpose-built rental as a share of total housing starts seen in Ontario since 1994.

Figure 2-17

Rental Housing Starts by Year, as % of Total Housing Starts

Studied Municipalities, 2007-2021



Source: Altus Group based on Census data

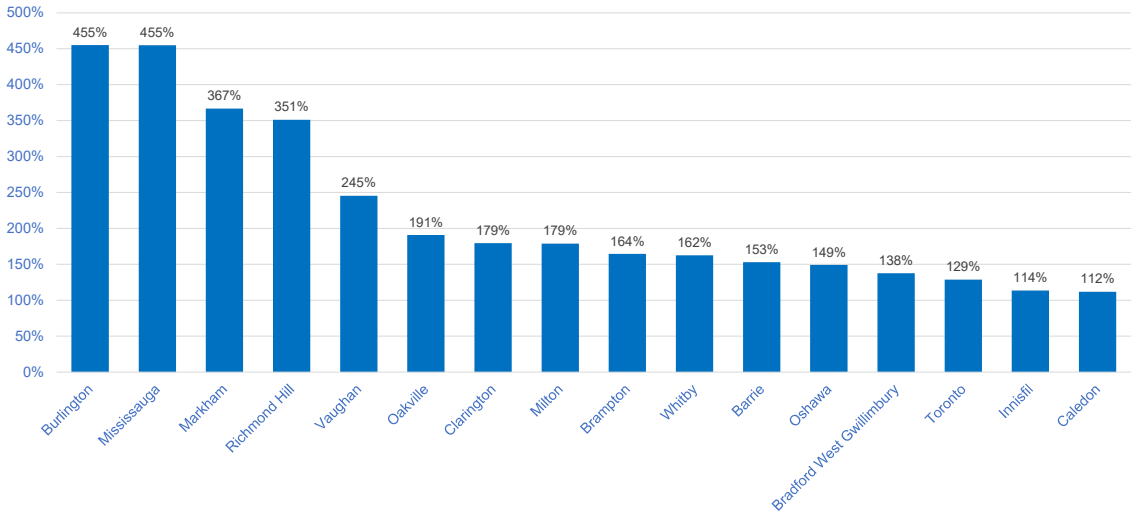
2.3 OTHER MUNICIPAL DATA

2.3.1 Housing Prices

Since 2006, housing prices in the municipalities examined have increased significantly. Based on CMHC data, over 2006-2021, average prices of absorbed single-detached homes have increased by an average of 222%.[4] Figure 2-18 shows the changes in absorbed single-detached housing prices over the 2006-2021 period.

Figure 2-18

Change in Absorbed Single-Detached Housing Prices
2006-2021



Source: Altus Group based on CMHC Housing Now data

2.4 PLANNING STAFF

Using available municipal data published through each municipality's annual Financial Information Return ("FIR"), an analysis was undertaken to estimate the number of planning staff hired (Full-Time Equivalent or "FTE") as a share of the total municipal workforce.

On average, 3.08% of municipal workforce are reported in the FIR under the category of "Planning", ranging from 1.49% in Oshawa to 8.8% in Caledon.[5]

[4] The percentage change in absorbed single-detached housing prices should be used with some caution as the data does not control for size of single-detached dwellings in the sample, meaning that the data set could be skewed towards luxury estate lots in one period, but smaller single-detached dwellings in a residential subdivision in another period.

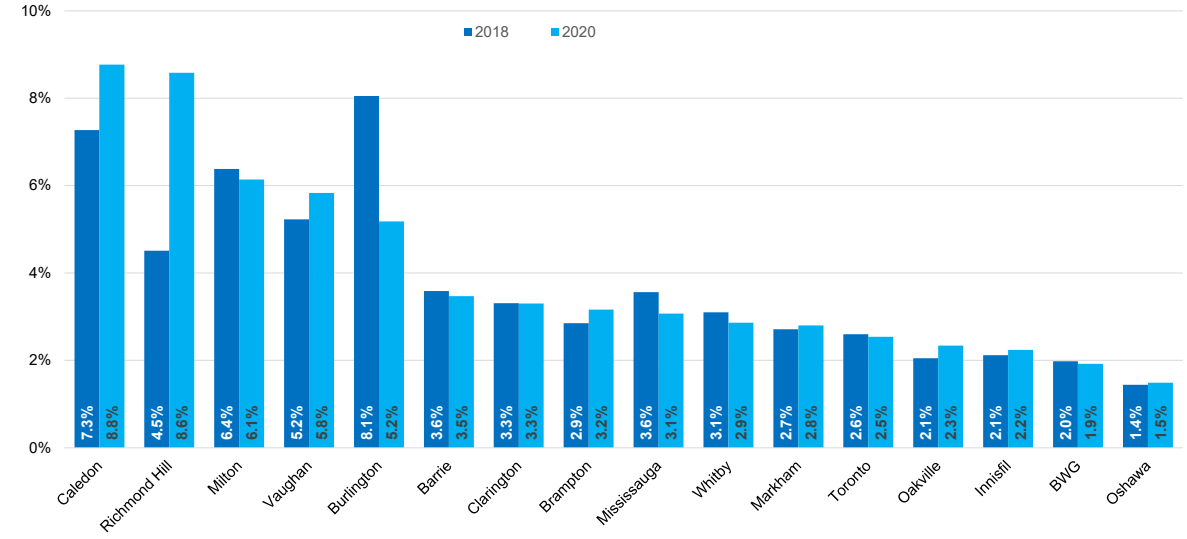
[5] Employees of upper-tiers of government are distributed to lower-tier totals used for these calculations based on proportion of population within the lower-tier as % of the Regional/County population

This average has increased marginally from 2018, when 3.06% of the workforce in studied municipalities comprised of Planning employees.[6]

Since 2018, the municipalities that were studied have increased planning department FTEs by 1.7%, compared to 0.9% for the rest of the municipal workforce. This implies that municipalities appear to be prioritizing increased staffing levels for planning departments, although the relative changes may have also been the result of difficulty hiring in other municipal departments.

Figure 2-19

Planning FTE as % of Total Municipal Workforce (as Ranked on 2020 data)
2018 & 2020



Source: Altus Group based on Municipal Financial Information Return Data

Only three (3) of the 16 municipalities saw a decrease in Planning FTE as reported in FIRs - Burlington (-32%), Mississauga (-10%) and Toronto (-3%). It has been found in some municipalities that reduced staffing levels are driven by factors such as increased vacancies, as well as difficulties in attracting and retaining talent. For example, the City of Toronto found that nearly 13% of its 477 FTE staff positions were vacant as of April 2022, with 25% of staff hired since January 2020. The City found through exit interviews that prominent factors associated with difficulty in filling open positions, or retaining existing staff, included:

- Compensation;
- Life cycle / Retirements;
- Intensity of the work environment, including being subject to OLT hearings and public-facing elements;

[6] It is noted that staff in other departments are commonly also involved in development application review and other planning-related day-to-day tasks

- Portability of the planning profession; and
- Cost of living.[7]

Between 2018 and 2020, the largest increases in Planning FTEs as a percentage of the total municipal workforce were recorded in Richmond Hill, Vaughan, and Oakville.

2.5 SUMMARY OF FINDINGS

Based on the review of demographic and statistical information for the municipalities studied, the following was found:

- Except for the City of Mississauga over the 2016-2021 period, all municipalities examined observed an increase in their respective populations in each five-year period between 2006 and 2021. However, annual average population growth among all municipalities combined slowed in each consecutive five-year period, from an annual average population growth rate of 1.70% per year for the 2006-2011 period, to 1.17% for the 2011-2016 period, and to 0.87% for the 2016-2021 period;
- Three GTA regions - the City of Toronto, Peel Region and York Region experienced a net outflow of residents to other parts of Ontario, with the most significant outflows seen in Toronto and Peel. The net number of persons leaving these regions for other parts of Ontario has been increasing in recent years;
- Simcoe County, Durham Region, and Halton Region saw a net inflow of persons from other municipalities in the province. While the net inflow of persons remained positive and stable in Halton Region, Durham Region (+10,000 persons per year in 2020 and 2021) and Simcoe County (+8,000 persons per year since 2016) recorded significant increases in net inflows of persons;
- Over the last 15 years, there has been an increasing proportion of housing starts in higher density forms such as apartments, while the share of lower density housing forms (single-detached and semi-detached) has declined. Over the 2017-2021 period, only 18.7% of total housing starts in the municipalities examined where single- or semi-detached units; and

[7] City of Toronto Staff Report dated June 20, 2022 (to Executive Committee) https://www.toronto.ca/legdocs/mmis/2022/ph/bgrd/backgroundfile-227742.pdf

- Since 2006, housing prices have increased significantly. Between 2006 and 2021, average prices of absorbed single-detached homes increased by an average of 222%.[8]

[8] The percentage change in absorbed single-detached housing prices should be used with some caution as the data does not control for size of single-detached dwellings in the sample, meaning that the data set could be skewed towards luxury estate lots in one period, but smaller single-detached dwellings in a residential subdivision in another period.

3 MUNICIPAL UTILIZATION OF TOOLS AND PROCESSES

This section of the report reviews the municipal development planning tools that are available to assist staff in reviewing development applications submitted to municipalities, or help applicants navigate the requirements for their development submissions.

3.1 SCORECARD ON PLANNING SYSTEM FEATURES

3.1.1 Approach

This edition of the BILD Benchmarking Study continues with the review of features and tools made available by municipalities in the Greater Toronto Area ("GTA"). After an internal review and feedback from both the development community and municipalities of our scoring process from the first study, we have both expanded the number of features recorded and readjusted some of the criteria. Scores from the last edition are not interoperable, unless otherwise stated.

Each municipality is scored on the availability of features that can support an efficient planning approvals system, as well as increase transparency for developers, the public, or other interested parties. Full details of the scoring criteria can be found in the Appendix. The rankings of municipalities are organized into three scoring clusters per theme. The range for the clusters was determined by the ultimate score distribution received by the studied municipalities.

3.1.2 Scoring

As an example of the changes made, the scoring of development tracking systems in the 2020 Study considered the availability of active application data and the presentation of that information in an interactive map, which were both embedded into a single score. In this edition, the scoring of these two features has been separated and in addition, three new features have been added in an overall theme of 'Development Application Tracking' to provide further contrast between municipalities' capabilities.

Municipalities have been organized into tiered clusters according to the level of improvements required, instead of providing specific rankings or scores for each feature. Only aggregated and averaged scores for features and themes are provided to indicate common deficiencies. The purpose of this change is to encourage municipalities, even those with high rankings, to re-examine their processes for potential improvements, while providing them guidance on the best-in-class examples they can emulate.

The 16 features have been organized into five themes as follows:

Figure 3-20

Theme	Elements
Development Guidance	Development Guidance Information Application Support Materials
Development Application Tracking	Active Applications Status Indication Historical Application Information Map of Development Data Supporting Documentation Available
Electronic Submission and Payment Capabilities	Ability to e-submit applications Ability to e-pay application fees Ability to e-submit building permit application Ability to e-pay building permit fees
Availability of Key Planning Documents	Dedicated Interactive Zoning Map Available of GIS Zoning Open Data Available Municipal Official Plans and Secondary Plans
Accountability / Availability	Availability of municipal staff directory Available of meeting minutes, agendas, agenda items

More information on scoring criteria and individual municipal scores can be found in the Appendix and Figure 3-31 respectively.

3.1.3 Caveat

While this exercise provides insights into the level of sophistication of the municipal planning administrations being examined, the ratings do not necessarily reflect individual experiences an applicant may have when they submit a development application.

There are many aspects in the planning process that cannot be given a score but still influence the overall application experience. These can include the disposition of councils towards agreeing to new development, staff members rigidity or interpretation of policy, community temperament towards new housing, etc.

As an example, a municipality can have an outstanding development application system that makes submissions relatively frictionless, and/or staff

that provide recommendations in a timely manner. However, without Council and/or public support for more housing units getting approved and ultimately built, the development application processes and systems alone cannot make up for issues related to obstructionism or overall planning policy deficiencies.

3.2 THEME-BY-THEME SCORING OVERVIEW

3.2.1 Development Guidance

3.2.1.1 Overview and Rationale for Inclusion

The Development Guidance theme consists of two features that try to assess the breadth and the depth of information available associated with the requirements of the development application process. There are two scoring elements:

- Development Guidance: Based on the availability of 20 parameters of basic information setting out process and procedures in the development application process that include, but not limited to, overviews of application types to explanations on how fees can be paid. The full list of parameters can be found in the Appendix.
- Application Support Materials: Often referred to as a ‘term of reference’ or ‘glossary’, this information provides a list of reporting requirements necessary for an application, and the outline or explanation of what reports should address. This information is important for both developers and their consultants to meet municipal reporting requirements.

These elements provides both small and large, as well as new and experienced applicants, with guidance on how the development process proceeds and what is required to provide a complete submission. This can help increase the quality of submissions by developers or their consultants and can cut down on the number of non-value-added tasks that consume staffing resources, such as handling inquiries for explanations of basic procedures (e.g. application fees/cost, application submission guidance, request for forms, etc).

3.2.1.2 Scoring

Scores for development guidance information was based on best efforts to explore municipal webpages, applications forms, documents and guides that were available. Websites were reviewed between March 2022 and August 2022.

Figure 3-21

Summary of Scoring - Theme 1 - Development Guidance

	Average Score
Development Guidance Information	78%
Application Support Materials	58%
Overall Score	**68%**

	Needs Improvement			
Score by Municipality	0% to 60% Significant Improvement	60% to 79% Moderate Improvement	80% to 99% Minor Improvement	100% Best in Class
Burlington		X		
Oakville				X
Milton	X			
Mississauga		X		
Brampton				X
Caledon	X			
Toronto				X
Vaughan		X		
Richmond Hill			X	
Markham	X			
Whitby	X			
Oshaw a	X			
Clarington		X		
Bradford West Gw illimbury	X			
Innisfil	X			
Barrie				X

Source: Altus Group Economic Consulting

Many municipalities have updated their websites in recent years. While these updates have generally resulted in more complete development guide information, some websites are poorly organized with respect to how information is laid out or have limited information. Many municipalities also continue to not provide basic lists of potentially required studies in their term of references beyond basic drawings and general statements that more information will be provided in a pre-application process.

Most of the municipalities studied have development guides that meet most of the scoring parameters. Municipalities received partial marks for providing some development guidance information, even if the information provided was not complete.

Only five (5) municipalities provided complete lists for terms of references, while nine municipalities provided some form of application support guidance material (e.g., urban design guidelines, shadow report terms of reference, etc.). Only two (2) municipalities provided absolutely no application support guidance materials or lists.

Several municipalities indicated that an applicant could email the planning department if they wish to receive more guidance material. Since this information was not available on their websites in an easily accessible form, it was not included in the grading.

Some municipalities indicated what their application fees were by referring applicants to review by-laws. These by-laws often include charges for a list of municipal services and could be difficult to navigate for someone unfamiliar with legal language.

Figure 3-22

Common Issues	Best Practices
• Failing to state how applications fees could be paid or providing unclear language about payments that may be required. For example, a statement that payment options would be sent to the applicant after applications were submitted but further information about actual methods of payment were not included. • Application support material requirements missing from main development guide webpages and instead presented in difficult to find places, such as the bottom of application forms. • In some instances, municipalities have updated webpage or development guide but had contradictory statements in other application forms. For example, application forms state that paper copies of documents are required even though the municipality had indicated on another webpage that document submission is required by email. • Websites having numerous dead links on both webpages and hyperlinks in documents. Municipalities should regularly review links on their webpages or documents to ensure they are working as intended. • Some municipalities explain the steps required for submitting a complete application but would not necessarily provide guidance on the steps that occur after the submission (e.g., review by staff, staff report is written, reviewed by committee, reviewed by council for approval or denial, etc). • Some municipalities would explain what an Official Plan Amendment or Zoning Bylaw Amendment is by simply linking to their	• Review the organization of existing information to ensure it is in places that are easy to find or noticeable. • Ensure that all parameters set out for development guidance information is available and accounted for. • Include checklists for applications both on main webpages and inside application forms. • Provide clear indication of what applicable fees are by application type in a user-friendly format (not just a link to a by-law) • Make sure documentation and webpages are consistent. • Seek out feedback from both new applicants and applicants with experience on user friendliness of websites and guides. • Add all available guidance materials on main webpages so that applicants do not need to make requests and use staff resources for something that should be easily accessible. • At a minimum, municipalities should be providing lists of report requirements for applications in their development guide as a first step, before creating a term of references with fully fledged descriptions. • Municipalities should take the study requirement listed in their official plans, as required to be produced by the *Planning Act*, and provide that information on their main

official plan or zoning bylaw instead of providing a fulsome explanation.	development guide webpage to form the foundation of their terms of references. • The province should require municipalities to list information requirements on their websites to be allowed to request that information from an applicant.

3.2.2 Development Application Tracking

3.2.2.1 Overview and Rationale for Inclusion

The Development Application Tracking theme consists of five features that try to assess the level of information availability for on-going and historic development data.

- Active Applications: Reviews the basic availability of active development application information. There are three places that active application data can be found: agenda items for council meeting minutes; open data portals; and dedicated webpages. This feature strictly accounts for the availability of information from open data portals or dedicated webpages as data availability from agenda items are covered by in another feature.
- Status Indicator: This feature provides tracking information on applications as they move through the planning process.
- Historical Application Data: This feature allows for stakeholders to understand what recent developments have been approved by a municipality.
- Map of Development Applications: This feature is indicator of transparency and is also a useful resource to understand how a municipality is growing.
- Development Application Supporting Record: This tracks the availability of records associated with development beyond just high-level information. As well, it provides an insight to the public, researchers, and potential applicants to the level of reporting requirements.

Providing transparent information to the public on the status of development occurring in a municipality is crucial in understanding how municipalities are changing and growing. This information can be critical when making decisions about where to invest and what kinds of housing to build. Furthermore, the ability to embrace technology is an indicator of an organization's dynamism and ability to incorporate data and information in evidence-based policy making.

3.2.2.2 Scoring Results

While most municipalities provide some sort of system to track active applications, few provide data on historic applications and/or approvals, or mapping showing the location of applications or approvals in one place.

Figure 3-23

Summary of Scoring - Theme 2 - Development Application Tracking

	Average Score
Active Applications	84%
Status Indicator	72%
Historical Application Data	44%
Map of Development Applications	56%
Supporting Records/Studies	47%
Overall Score	**61%**

	Needs Improvement			
Score by Municipality	0% to 60% Significant Improvement	60% to 79% Moderate Improvement	80% to 99% Minor Improvement	100% Best in Class
Burlington			X	
Oakville			X	
Milton		X		
Mississauga				X
Brampton			X	
Caledon			X	
Toronto				X
Vaughan				X
Richmond Hill	X			
Markham	X			
Whitby	X			
Oshaw a	X			
Clarington	X			
Bradford West Gw illimbury	X			
Innisfil	X			
Barrie			X	

Source: Altus Group Economic Consulting

Since the first *BILD Benchmarking Study*, an additional two municipalities (Bradford West Gwillimbury ("BWG") and Markham) have added development application tracker capabilities. BWG's website provides data on applications that were submitted under the *Planning Act* as of November 25th, 2020.

Additional municipal-specific findings regarding the availability of tools are as follows:

- Markham produces bi-weekly dashboard summaries in PDF formatted files of new applications in circulation dating back to March 16th, 2022. However, it's possible to research applications up to ten (10) years in the past through their e-plan public portal system;
- Markham and BWGs trackers provide very rudimentary information and neither provides their data in an interactive map. Markham's bi-weekly dashboard provides a static map with a pin indicating the location of the

application in addition to its address. BWG organizes applications by ward to help provide geographic referencing beyond a text-based addresses; and

- Whitby, Innisfil and Oshawa received low marks in this theme area, as they did not provide sufficient tracking data beyond what is available through their council or planning committee meeting minutes.
  - While Whitby's economic development webpage highlights recent and future developments, the only actual information offered are links to the project's privately hosted websites, the general name of the development, and a very high-level description.
  - Oshawa has a website named "Oshawa Tour of Growth & Development. While this website provides some useful metrics, such as site size, gross floor area and number of units, etc, it does not provide any specific development application data. Rather, their website focuses on providing information to the public about the anticipated construction commencement date of projects.

Most municipalities that were examined have existing record keeping capabilities that suggest they can report yearly timelines for all applications that are approved, denied, or are on-going without creating significant administrative burdens. The provincial government should consider requiring these municipalities to provide standardized reporting, made available to the public, on an annual basis.

"Planning Information Returns" (or "PIRs") would be similar to the existing "Financial Information Returns" each municipality submits annually – the PIRs, if mandated by the Province, could require a yearly submission that covers and reports on planning metrics, in particular application timeline data.

Figure 3-24

Common Issues	Best Practices
• Some municipalities provide active information on applications in lists that appear in PDF documents. • Many municipalities have not embraced interactive maps. • Some municipalities have interactive maps for active developments in their open data portals, but these are not properly linked to their planning department or development guide webpages. • Very few municipalities provide supporting documents included with information on	• Some municipalities provide separate dedicated webpages for major applications. • Organizing active application tracking by some sort of geography (ward, district, etc.) can provide meaningful orientation as to where and what kind of growth is occurring. • At a minimum, municipalities should be transparent about what documents were included with an application and provide them by request.

active applications. This includes traffic studies, housing reports, hydrology reports, etc. Not having these reports available to the public dilutes overall transparency in the development process.	

3.2.3 Electronic Submission and Payment Capabilities

3.2.3.1 Overview

The electronic submission and payment theme consists of four features that try to assess the ease at which an applicant can submit their application and pay all associated fees. The four features are described as follows:

- Ability to Submit Planning Applications Electronically;
- Ability to Pay Planning Application Fees Online;
- Ability to Submit Building Permit Applications Electronically; and
- Ability to Pay Building Permit Fees Online

Providing applicants with online submission choices and a wider array of payments options allows for an easier process for both applicants and staff members charged with intake. This allows applicants to focus on providing higher quality submissions and can enable automation of various tasks, which can help lower municipalities' own internal process burden and error rate.

Staff dedicated to intake applications can spend more time reviewing the completeness and correctness of application submissions, which is a task that provides more value than checking their own submission errors. Finally, payments for applications, which many municipal departments rely on as a funding source for staff time associated with development application review, can be done more efficiently, expeditiously, and with fewer delays, benefiting everyone in the process.

3.2.3.2 Scoring Results

The adoption of online submission acceptance has been relatively sporadic. Not all municipalities that provide dedicated portals for planning or building submissions accept online payments and some municipalities that accept online payments do not accept electronic submissions.

Six (6) of the 16 municipalities examined have fully functional portal for planning application submissions, although only half provide online payment functionality. In addition, five (5) municipalities offer the applicant an email or use of an electronic drop box, but none of these municipalities offer online payment capabilities.

Figure 3-25 **Summary of Scoring - Theme 3 - Electronic Submission and Payment Capabilities**

	Average Score
Planning Applications	53%
Planning App. Payments	14%
Building Permit Submissions	72%
Building Permit Payments	41%
Overall Score	**45%**

	Needs Improvement			
Score by Municipality	0% to 60% Significant Improvement	60% to 79% Moderate Improvement	80% to 99% Minor Improvement	100% Best in Class
Burlington	X			
Oakville		X		
Milton	X			
Mississauga	X			
Brampton	X			
Caledon	X			
Toronto		X		
Vaughan		X		
Richmond Hill	X			
Markham				X
Whitby	X			
Oshawa	X			
Clarington	X			
Bradford West Gwillimbury	X			
Innisfil	X			
Barrie			X	

Source: Altus Group Economic Consulting

Municipalities that had online platforms but still scored poorly, lost marks because they did not provide the option to pay fees online. They may have this capability, but it was not possible to determine in some cases. Either they should consider adoption of an online payment system that works in tandem with their e-portal systems, or they should consider providing information on their websites about this capability so that it is readily available for applicants.

Nine (9) of the 16 municipalities examined have fully functional building permit portals, with four (4) of these municipalities not allowing any form of online payments. Five (5) municipalities provided the ability to email building permit applications, with two (2) of these municipalities accepting online payments.

Figure 3-26

Common Issues	Best Practices
• Inconsistent adoption of digital systems. Some municipalities allow plans or permits to be transmitted online but not payments or vice versa.	• Many municipalities that fully adopted e-planning or e-permit systems provided both user guides in written format and video. • The best user guides explained all steps of the submission process,

• Adoption of online submission and payment capabilities lags significantly for planning applications compared to building permits. • A majority (63%) of municipalities have not adopted full e-planning systems and continue to rely on either email or physical submissions. • Some municipal systems capped payments for fees at rates that would make in-practical for use in larger development projects.	include naming conventions for file formats, how payments could be made, and included some terms of reference materials.

3.2.4 Availability of Key Planning Documents

3.2.4.1 Overview and Rationale for Inclusion

The Availability of Key Planning Documents theme consists of three (3) features that try to assess the level of property and planning information accessibility. The three (3) features are described as follows:

- Dedicated Interactive Zoning Map: Assess the availability of zoning information for each parcel in a digital format that is easy to use by members of the public;
- Availability of Geographic Information System ("GIS") Zoning Open Data: Provides an indication of parcel data availability for members of the public that wish to create advanced analyses of land use planning or stakeholders who may seek to gain an understanding of how their property is zoned; and
- Availability of Municipal and Secondary Plans:[9] Assess the availability of fundamental policy documents such as Official Plans, Secondary Plans, etc.

Having key planning information readily available is important for members of the public, such as the development community, to assess opportunities, for consultants to provide advisory services more efficiently and accurately, for researchers exploring various topics on land-use policy, and other members seeking knowledge about how their municipality is guiding growth.

Key planning information should be made available to the public in formats that are easily accessible. Having information available helps public planners receive more constructive feedback on growth-related proposals and applications that more accurately account for existing land use policies.

[9] Also known as community, neighbourhood, or area plans in various jurisdictions.

3.2.4.2 Scoring Results

In the 2020 Study, only 25% of the studied municipalities provided their zoning schedules as open data Geographic Information System ("GIS") formatted files that can be downloaded. Since the 2020 study, an additional three municipalities (Milton, Mississauga and Oshawa) now provide their zoning in their open data catalogues, bringing the total to seven (7) out of the 16 (or 44%) of the municipalities studied. There are still many municipalities that offer interactive websites that use GIS data as the foundation of the service, but do not allow the data being displayed to be downloaded.

Figure 3-27

Summary of Scoring - Theme 4 - Availability of Key Planning Documents

	Average Score
Dedicated Interactive Zoning Map	44%
Availability of GIS Zoning Open Data	84%
Availability of Municipal Plans	100%
Overall Score	**76%**

	Needs Improvement			
Score by Municipality	0% to 60% Significant Improvement	60% to 79% Moderate Improvement	80% to 99% Minor Improvement	100% Best in Class
Burlington				X
Oakville				X
Milton				X
Mississauga				X
Brampton		X		
Caledon	X			
Toronto				X
Vaughan		X		
Richmond Hill	X			
Markham	X			
Whitby	X			
Oshawa				X
Clarington		X		
Bradford West Gwillimbury		X		
Innisfil		X		
Barrie				X

Source: Altus Group Economic Consulting

Note: Based on changes to the scoring criteria, Markham's scores were adjusted downwards in comparison to the last study in the dedicated interactive zoning feature, although their zoning portal has not substantially changed.

Municipal specific findings are as follows:

- 15 of the 16 municipalities provide access to zoning maps on their websites, either through an interactive map or as static PDF copies of schedules. Three (3) municipalities (Whitby, Richmond Hill and Caledon)

of the 15 municipalities offer their zoning maps as static PDF formatted files;

- Two municipalities (BWG and Innisfil) have their interactive zoning maps hosted by Simcoe County, their upper-tier administration. Regions and counties in Ontario should consider providing web hosting services on behalf of their lower-tier municipalities to improve efficiency and coordination. This would both benefit smaller municipalities who may lack in-house capabilities and resources to provide such a service, as well, provide a contact point between lower-tier and upper-tier information technology teams even in cases where a lower-tier also hosts their own maps;
- Toronto was given full marks for both features despite not making information available from its pre-amalgamation municipalities as its harmonized zoning by-law does not apply to all lands within the City's boundaries. Toronto should consider making both the full text and schedules of these older zoning codes available to the public to be viewed on their website. The City should also provide consolidated versions of the former zoning codes with regular updates, as they are still frequently amended. It should not be necessary to contact Toronto Building Customer Service or rely on archived materials to get rudimentary information about their property's status;
- Of all the municipalities examined, only one municipality – Markham – does not provide any accessible or timely zoning information. While the City does provide the text of their Urban Area By-law 177-96 zoning code, it has not provided an updated consolidated version since July 2018. Further, the copy available online does not include any of the referenced schedules that would identify a property or parcel's zoning status. For a property owner in Markham to understand the zoning permissions for their property, they would need to contact the City, and complete forms (and pay $50), with the request process estimated to take up to 10 business days; and
- All municipalities studied provide official plans with schedules for key policy areas, such as land-use designations, heritage areas, protected natural features, etc, and for secondary plan boundaries. There is a wide range of formats that this information is presented in, including interactive web portals, open data GIS files, and static PDF formatted maps. While official plan schedules are important to have, having parcel level data is not as critical in this area of information as it is for zoning. Therefore, the distinction has not been made how this information was made available.

Figure 3-28

Common Issues	Best Practices
• Many municipal open data catalogues receive regular data uploads but do not include zoning GIS data. • Some municipalities only have interactive zoning maps in their open data catalogues but not on their main webpages. These should be linked on their main planning or development webpages as the feature is present but not easily found. • Some interactive maps have poorly designed user interfaces and make selecting the zoning display difficult. Either the option to view zoning takes many steps to find or only works at extremely closely zoomed-in levels.	• Many interactive maps only provide very high-level information, such as just zoning parcel colouring. The best interactive zoning maps also provided links to relevant bylaw text in zoning descriptions found when clicking on a polygon boundary. • Display links that send users to static or interactive maps more prominently beside development guide information for zoning to enhance interfaces. • Provide, at a minimum, yearly consolidated versions of zoning bylaw text and maps that incorporated amendments that get passed by a municipality.

3.2.5 Accountability

3.2.5.1 Overview and Rationale for Inclusion

The Accountability theme consists of two features that try to assess the availability of municipal staff and the transparency of municipal council records. The two features are described as follows:

- Availability of Municipal Staff Contact Information: provides an assessment on how accessible municipal organizations make their staff to inquiries from the public and other stakeholders. Being able to contact someone directly can often expedite the resolution of an issue, particularly minor ones, or questions of clarification; and
- Availability of Meeting Minutes, Agendas, and Items: having a record of deliberations provides the development community, researchers, and the public the ability to understand a council's decision-making process and the reasons and rationale for the decisions made.

3.2.5.2 Scoring Results

All municipalities examined offer their agenda and meeting minutes online and include relevant staff reports as attached items. Although this feature was not tracked in the original benchmarking study, there generally has been a noticeable improvement of municipal meeting minutes webhosting capabilities over the last few years, which has improved record keeping. However, fulsome past records often do not exceed a few years in many of

the municipalities that have recently upgraded their meeting minutes systems.

Figure 3-29

Summary of Scoring - Theme 5 - Accountability

	Average Score
Availability of Staff Contact Information	50%
Availability of Agendas/Minutes/Items	100%
Overall Score	**75%**

	Needs Improvement			
Score by Municipality	0% to 60% Significant Improvement	60% to 79% Moderate Improvement	80% to 99% Minor Improvement	100% Best in Class
Burlington		X		
Oakville	X			
Milton			X	
Mississauga	X			
Brampton			X	
Caledon			X	
Toronto			X	
Vaughan			X	
Richmond Hill			X	
Markham				X
Whitby			X	
Oshaw a	X			
Clarington		X		
Bradford West Gw illimbury			X	
Innisfil	X			
Barrie	X			

Source: Altus Group Economic Consulting

Generally, all municipalities offer web recordings of their council deliberations or highlights. These recordings are usually hosted either on a dedicated municipal web service or on public services such as YouTube. The availability of recordings varies between municipalities in terms of coverage, with some only offering playbacks of council meetings while others offer extensive coverage of various kinds of committee meetings, such as committee of adjustment deliberations.

Five (5) of the 16 municipalities provide contact instructions that are directed towards central service hubs such as 311 or its equivalent email and do not provide departmental or staff contact information. Two (2) municipalities offer a general dedicated email and phone number for their planning and permitting departments. Six (6) municipalities offer email and phone contact information for individual units within their planning or permitting departments.

Toronto and Brampton provide specific staff contact information, including name, department, job title and phone number, however, neither municipality offers email contact information.

Only Markham offers both of staff's phone and email information, which is why it was alone in receiving the highest grades. Both Markham and Brampton offer search capabilities within their web hosted staff directory. This functionality allows for filtering using search terms such as the name of a staff member or department, which is an organizational feature that is noted but not graded upon. Toronto organizes its staff directory according to departments that are further organized by functional unit in individual PDFs for each department that then contains staff phone contact information.

Figure 3-30

Common Issues	Best Practices
• Not including both emails and phone numbers for either staff or business unit directories. • Putting staff contact information in difficult to find locations on webpages. • Not providing descriptions of business unit or staff members function beyond name or title. • Only providing contact information for executive directors' offices instead of individual staff members.	• Provide search functionality with staff directory. • Include both emails and phone numbers for either business unit or staff members. • Organize staff members by a category - geography, business unit, or function. • Include staff members job title and the division or department they belong in. • Create a central staff directory that is connected to the planning or building department webpage 'contact us' link.

3.3 COMBINED SCORE

In combining the scores across all themes used, and weighting the categories based on an assessment of the relatively importance of each item within each theme, the City of Toronto ranks highest in utilizing tools and features that are thought to have an impact on the ability of municipalities and applicants to deliver housing supply in a timely and efficient fashion, with a score of 90%, losing marks only in Theme 3 (E-Submission capabilities). There are six (6) municipalities with scores above 75% - Toronto, Barrie, Oakville, Mississauga, Vaughan, and Brampton.

Figure 3-31 **Municipal Scoring, All Planning Tools and Features**

Rank	Municipality	Overall Weighted Score	Theme 1	Theme 2	Theme 3	Theme 4	Theme 5
1	Toronto	90%	100%	100%	63%	100%	88%
2	Barrie	87%	100%	80%	88%	100%	50%
3	Oakville	84%	100%	80%	75%	100%	50%
4	Mississauga	77%	75%	100%	50%	100%	50%
5	Vaughan	77%	75%	100%	63%	67%	88%
6	Brampton	75%	100%	80%	50%	67%	88%
7	Burlington	70%	75%	80%	25%	100%	75%
8	Markham	64%	50%	50%	100%	33%	100%
9	Richmond Hill	62%	88%	50%	50%	50%	88%
10	Milton	61%	50%	70%	13%	100%	88%
11	Caledon	58%	50%	80%	38%	50%	88%
12	Clarington	51%	75%	30%	25%	67%	75%
13	Bradford West Gwillimbury	46%	50%	50%	0%	67%	88%
14	Oshawa	41%	25%	20%	19%	100%	50%
15	Innisfil	37%	25%	0%	50%	67%	50%
16	Whitby	34%	50%	0%	13%	50%	88%

Source: Altus Group Economic Consulting

There are four (4) municipalities scoring less than 50% - Bradford West Gwillimbury, Oshawa, Innisfil and Whitby.

3.4 STUDY REQUIREMENTS

Many planning applications require numerous studies, plans, drawings, and technical reports to be submitted to satisfy municipal staff regarding the nature of the proposal and detailing any potential impacts on the community.

A review of development guides for seven (7) municipalities, including some lower-tier, upper-tier and single-tier municipalities, shows the range of potential studies that may be required for a development application. The full list of potential studies is presented in Figure 3-32.

Across three (3) of the 16 municipalities examined (Toronto, Oakville, Brampton), almost 42 different types of studies were found, with many applications usually requiring some combination of 10 to 20 of these studies - depending on the municipality, location of the development and the type of building(s) and uses being proposed.

Figure 3-32

Studies and Technical Reports / Plans That May Be Required in Select Municipalities

	Municipality		
	Toronto	Oakville	Brampton
Affordable Housing Report			X
Agricultural Impact		X	
Air Quality Study		X	
Arborist Tree Preservation Report	X	X	X
Archeological Assessment	X	X	X
Climate Adaptation Strategy			X
Community Services and Facilities Study	X		X
Contaminated Site Assessment	X		
Design Brief / Rationale	X	X	X
Electromagnetic Field Management Plan	X		
Energy Strategy	X		X
Environmental Impact Study	X	X	X
Erosion Hazard Assessment	X		X
Financial Impact Study		X	
Fish Habitat Assessment		X	
Geotechnical Study / Soils Report	X	X	X
Growth Management Strategy			X
Cultural Heritage Impact Statement	X	X	X
Housing Issues Report	X		X
Hydrogeology / Groundwater Assessment	X	X	X
Landscaping Plan	X	X	X
Lighting Plan	X	X	
Loading Study	X		
Market Analysis		X	X
Natural Heritage Impact Study	X	X	X
Noise Impact Study	X	X	X
Parking Study	X	X	
Pedestrian Route and Sidewalk Analysis		X	
Phasing Strategy			X
Planning Rationale / Justification	X	X	X
Public Consultation Strategy Report	X		X
Servicing Report	X	X	X
Stormwater Management / Drainage Report	X	X	X
Streetscape Plan		X	
Sustainibility Score / Checklist	X	X	X
Sun/Shadow Study	X	X	X
Topographical Survey	X		
Traffic Operations Assessment	X		
Transportation Demand Mgmt Strategy		X	
Transportation Impact Study	X	X	X
Vibration Study	X	X	
Wind Study	X	X	

Note: Some studies shown as not being required may actually be required within other larger studies shown, depending on the specific terms of reference for each study. In most instances, the studies listed may only be required for some application types, or only in some

Source: Altus Group Economic Consulting based on information available from municipalities

3.5 CONCLUSIONS

The review of planning tools and processes utilization has found that some tools that could assist with potentially streamlining municipal processes and commenting periods, or would improve the quality of submissions from applicants, such as online submission portals and detailed terms of reference

for technical studies required for review of development applications, are often not used in many of the municipalities studied.

A review of the list of studies that may be required by municipalities shows that some development applications may be burdened with a vast array of study requirements - in some cases between 10 to 20 studies are required for a single project, depending on the municipality, application type, and location of development.

The required quantity and variety of technical studies, even if many (if not all) are necessary to ensure that developments are in the public interest, results in significant costs to retain experts necessary to complete the studies and adds significant time for the studies to be completed, and then reviewed by municipal staff. The greater the number of studies also likely increases the likelihood of revisions and resubmissions, adding more time to the approvals process.

4 ESTIMATES OF MUNICIPAL APPROVAL AND PERMIT TIMELINES

Lengthy timelines for development application approvals from municipalities are a common complaint of development industry stakeholders. This section reviews findings from exhaustive research into timelines for recently approved applications for most municipalities studied in this report.

4.1 APPROACH

Altus Group Economic Consulting endeavoured to measure 'typical' approval timelines for development applications in various municipalities across the Greater Toronto Area.

The approval timelines were measured from the date a municipality provided acknowledgment that an application was deemed 'complete'[10] to when a planning approval was provided by the municipality. The nature of a 'planning approval' can take many forms, including approvals provided by a municipality for official plan amendments, zoning by-law amendments, draft plan of subdivision, draft plan of condominium, site plan approval, or a combination thereof.

Although contingent on the data made available by municipalities, it was possible to undertake a few types of analyses of approval timelines for different application types for municipalities in the study. However, not every municipality made available all necessary information to do the analysis for all application types, and there are some municipalities where certain types of applications are relatively rare (i.e., subdivision applications in the City of Toronto). Only in instances where it was possible to obtain robust samples for particular application types are findings shared. An overview of the sources for data informing our analysis are summarized in the following table.

It is noted that this analysis does not factor in several other major time-intensive elements of the entire development process including:

- There are significant timelines associated with the process of getting vacant land designated for urban uses (e.g. greenfield development) – often this process can take several years, and in some cases can take upwards of 10 or more years; and
- The significant period of time that an application may take to achieve a 'complete application' status (i.e. "pre-submission"),
- The period of time from development approval to building permit approval.

[10] Such as, direct affirmations of an application's complete status date or the date a notice of a public meeting was provided.

It was noted by municipal stakeholders that, after the initial response from staff to a complete application, the interim period applicants spend reviewing and responding to comments isn't within their control to dictate but can still add significantly to how long applications take to process.

However, in many cases, the time spent can at least be in part indirectly attributed to the often lengthy, complex and/or vague list of requirements for technical studies for development applications, as well as council decision making, staff turnover and other internal organizational issues.

It is not possible to precisely allocate responsibility for long approval timelines between municipalities, applicants or other participating agencies, Ministries, etc., given the limitations of the data available.

However, municipalities should endeavour to use the metrics provided in this report, and past editions, to help guide them on maximizing best practices that minimize delays, and to use the data presented as a reference point in examining their improvement or deterioration of service standards. Municipalities are encouraged to provide data that can be independently reviewed that helps to shed light on the causations of delays as part of constructive dialog and practice.

Figure 4-33

Data Source	Description
Municipal Application Status Lists	Some municipalities provide comprehensive lists of recently approved applications. Often, data can be extracted from the published records about date of complete application, date of approval(s), etc.
Council / Committee Agendas, Minutes, Staff Reports	Each municipality studied makes some amount of information regarding development approvals through agendas, minutes, and associated documents and staff reports available through Council / Committee meeting portals. Council / committee agendas were carefully reviewed to tabulate development approvals, with searches then undertaken for sources with a recorded date of complete application – often this information is contained within the staff report recommending approval.
Open Data Portals	Some municipalities make datasets available with recently approved development applications, which often include data regarding the date of complete application, and approval (and for which planning instruments planning approvals were obtained).

As the approval timeline data for the 2020 Study was for approvals through February 2020, the data for this second edition of the analysis if for all municipal approvals received since March 2020. It is acknowledged that in many municipalities, due to the initial shutdowns associated with COVID-19 response, development applications that may have been slated for processing or approval in Spring 2020 could have been delayed to await the return of staff or the necessary statutory meetings to occur.

Conversely, some workplaces have found that 'work from home' led to productivity improvements, which may have ultimately improved approval times to the extent utilized by some municipalities. These two effects could affect some of the results of this study in comparing them to the results of the first study – comparisons made between the two studies should be done with caution.

4.2 FINDINGS – DEVELOPMENT APPROVAL TIMELINES

4.2.1 Overview of Methodology

The analysis summarized below is based on a significant amount of work to collect as robust of a sample as possible. Altus Group collected data on nearly 600 planning applications that were approved by the 16 study municipalities since March 2020.

Altus Group also contacted key staff at each municipality to see if municipalities would be willing to volunteer data to incorporate into our analysis. We have received data from six (6) of the 16 municipalities with a total of approximately 320 approved development applications between them.

For clarity, it should be noted that this analysis does not include timelines associated with the following types of approvals:

- Developments that were refused by the municipality and may have been subject to an and ultimately approved through the appeals process. Where those applications that are ultimately approved by the Ontario Land Tribunal (OLT), take considerably more time to gain approval, the timelines associated with these applications are not included in our analysis. While the basis for the appeal may be due to municipal refusal, the quantum of additional time required to obtain approval from an OLT process is not necessarily reflective of issues with municipal processes that are the subject of this part of our study. Timelines for review of development applications appealed to OLT can often be lengthy due to productive reasons such as time spent in settlement discussions, or other reasons that are not in the control of the municipality, such as OLT case backlogs that delays the scheduling of hearings;
- Applications that are obvious outliers, such as applications approved but where the timelines significantly exceed the average of most other data points in the sample. In our experience, these 'outlier' applications and approvals can be due to one or more of the following circumstances:
    - Some application approvals may, for example, involve lands that have been sold to a new owner who has decided to make modifications to a pre-existing submission, however as these instances are not necessarily the fault of the municipality, they have not been included;

- Some applications have numerous resubmissions – in these cases, only the 'final' submission that the municipality made the decision upon was utilized;

We have also instituted several safeguards in our data collection method to ensure that our data sample and resulting estimates of approval timelines is as conservative as possible:

- To ensure that our data sample is relatively free of outlier applications, we have also calculated median timelines and compared these to the average timelines to ensure that the dataset is not overly skewed one way or another;
- In cases where a date of complete application was not certain, we have used other known post-date of application milestones that necessarily would have had to come after the date of complete application;

Accounting for these outliers and using conservative assumptions is likely the driver why the Altus data sample, when compared with the six (6) datasets provided by study municipalities, generally produces lower average timelines than municipal-provided data. A table comparing the Altus dataset findings and the findings from the municipal datasets is presented later in this chapter.

4.2.2 Findings by Municipality

The analysis shows significant variations in the approval timelines among municipalities studied, ranging from 10 to over 34 months with 11 of the 16 municipalities having averages above 20 months.

The averages shown in the figure below are broken out for each individual application type where the sample size permits, and a weighted overall average for each municipality based on the sample-wide share of each application type in the entire study-wide sample.[11]

Where data was supplied by municipalities, the lower weighted average timeline between the Altus dataset and the municipal dataset provided was used for the table below and ultimate scoring. Though as will be discussed later, the two data sources yielded results that were within 10% of each other where both Altus and municipal data sets were compared.

[11] The sample of approvals consists of 15% OPAs, 41% ZBLAs, 12% site plan, 16% plan of condominium, 17% plan of subdivision

Figure 4-34 **Estimated Average Approval Timelines, by Municipality and Type of Planning Application**

Rank	Municipality	OP Amdmnt	Zoning Bylaw Amdmnt	Site Plan	Plan of Condo	Plan of Subdvsn	Weighted Average	Total Sample
		Average Approval Timelines						
		Months						
1	Milton	**	9.2	13.7	**	**	10.2	n=29
2	Whitby	**	17.1	**	9.4	16.1	12.6	n=39
3	Barrie	13.8	9.3	15.2	19.2	14.2	13.1	n=59
4	Brampton	15.5	13.0	**	**	12.4	13.4	n=39
5	Oakville	**	15.8	**	7.6	15.6	13.9	n=24
6	Oshawa	27.1	23.0	**	**	25.6	20.3	n=27
7	Bradford West Gwillimbury	**	14.8	**	**	**	20.4	n=12
8	Clarington	**	20.9	**	**	24.4	21.9	n=11
9	Mississauga	27.2	27.6	19.2	13.7	**	23.0	n=60
10	Innisfil	**	20.3	**	**	**	23.2	n=13
11	Markham	**	24.8	15.1	**	23.5	23.5	n=23
12	Burlington	29.6	23.6	**	**	**	23.8	n=15
13	Vaughan	31.4	23.8	17.4	**	38.1	26.9	n=40
14	Richmond Hill	31.3	32.7	34.8	14.6	40.7	31.0	n=64
15	Toronto	25.1	30.3	34.7	18.2	**	32.0	n=141
16	Caledon	29.6	36.2	**	**	34.2	34.4	n=20
Average of All Municipalities		24.2	21.4	20.2	11.4	24.6	20.4	n=616

Note 1: Weighted average based on proportionate usage of various application types across all municipalities
Note 2: Average by individual unit type only shown where sample size is five or greater
Source: Altus Group Economic Consulting

4.2.3 Findings by Municipality Compared with 2020 Study

The table below compares the overall average timelines by municipality with the findings from our 2020 Study. Of the 15 municipalities in common between the two studies (Milton being newly added), 12 municipalities have seen worse approval timelines than estimated in the 2020 Study, with just three (3) municipalities seeing improvement - Whitby, Brampton and BWG.

Figure 4-35 **Comparison of Average Approval Timelines by Municipality, 2020 & 2022 Study**

		2020 Study		2022 Study			
		Average Timeline	Rank	Average Timeline	Rank	Trend in Time	Rank Trend
Rank	Municipality	*Months*		*Months*			
1	Milton	n.a.	n.a.	10	1	n.a.	n.a.
2	Whitby	13	7	13	2	better	better
3	Barrie	12	5	13	3	worse	better
4	Brampton	20	12	13	4	better	better
5	Oakville	11	4	14	5	worse	worse
6	Oshawa	9	1	20	6	worse	worse
7	Bradford West Gwillimbury	24	15	20	7	better	better
8	Clarington	13	9	22	8	worse	better
9	Mississauga	18	11	23	9	worse	better
10	Innisfil	9	2	23	10	worse	worse
11	Markham	13	6	23	11	worse	worse
12	Burlington	11	3	24	12	worse	worse
13	Vaughan	13	8	27	13	worse	worse
14	Richmond Hill	16	10	31	14	worse	worse
15	Toronto	21	13	32	15	worse	worse
16	Caledon	23	14	34	16	worse	worse
Average of All Municipalities		15		20			

Note 1: Pickering and Aurora were studied in 2020 Study but removed for 2022 Study. Milton was not included in 2020 Study, but added for 2022 Study

Source: Altus Group Economic Consulting

The overall average has increased from 15 months to 21 months, though it is acknowledged that part of this increase may be due to the 2-to-3-month period starting in March/April 2020 where Council meetings were frequently postponed or cancelled.[12]

In the 2020 Study, four (4) of the 15 municipalities had approval timelines greater than 20 months, compared to 11 of 16 in the 2022 Study. The largest ranking improvements were in Brampton, BWG, and Whitby. Several municipalities that were in the bottom-half of the ranking in the 2020 Study continued to be in the bottom half in the 2022 Study - Mississauga, Richmond Hill, Toronto and Caledon.

4.2.4 Findings by Application Type Compared to 2020 Study

When average approval timelines are broken down by application type, it is found that the approval timelines across all study municipalities have increased significantly regardless of application type. Compared to the findings of the 2020 Study to the 2022 Study, overall average approval timelines increased by 41%, with the average timeline by application type

[12] The data sample for the 2020 Study included approvals through February 2020. The 2022 Study uses a period of March 2022 onwards.

each increasing at a rate between 27% (Plan of Condominium) to 51% (OPAs).

Figure 4-36

Change in Average Approval Timelines by Type of Application

Application Type	2020 Study	2022 Study	% Change
	Months		Percent
Official Plan Amendment	16	24	51%
Zoning By-law Amendment	15	21	43%
Site Plan	15	20	35%
Plan of Condominium	9	11	27%
Plan of Subdivision	18	25	37%
Overall Weighted Average	15	20	40%

Source: Altus Group Economic Consulting

4.2.5 Municipal Data Received

In mid-2022, Altus Group contacted key personnel in each municipality studied, and we received data back from six (6) of the 16 municipalities in this report. We have found that, overall, our in-house analysis has yielded results extremely similar to what was provided by participating municipalities, with the average approval timelines for Altus Group data (for those six (6) municipalities) being on average 3 months lower than the data provided by municipalities.

Figure 4-37

Comparison of Approval Timelines - Altus Data Collection vs. Municipal Data Provided

	Weighted Average Timelines		
	Altus Data	Municipal Data	Months Difference
Application Type	*Months*		Percent
Barrie	14.9	13.1	(1.8)
Brampton	13.4	19.1	5.7
Milton	14.0	10.2	(3.8)
Mississauga	23.0	27.4	4.5
Oshawa	20.3	26.1	5.7
Richmond Hill	31.0	35.9	4.9
Average	20.3	23.7	3.4

Note 1: Municipal data received was filtered to remove non-residential applications, and applications with fewer than 3 residential units
Source: Altus Group Economic Consulting

There are several reasons for Altus Group estimates being generally lower than the municipally supplied data that are mainly due to wanting to be as conservative as possible in our estimates:

- Some differences will be due to the data samples differing slightly – what Altus Group was able to find on the public record versus the more complete data set provided by municipalities.
- The Altus Group analysis excluded major outliers to ensure that the average timeline was reasonably in-line with the median (50th percentile) timeline, so as to ensure that the averages shown generally reflect a typical application;
- The Altus Group analysis excluded some periods of time associated with resubmissions, using only the submission date of application for the submission version ultimately decided upon;
- Where a specific 'complete application' date could not be verified with the materials on the public record or made available by the municipality, we chose a date that necessarily came after that date and used that as a conservative proxy.

In the case of the other 10 municipalities that did not provide data, in most cases key municipal contacts did reply to emails seeking data for this study, but in most cases cited a lack of staffing resources to enable them to fulfill the

request. In some select cases, no response or reply was received despite repeated attempts to contact municipal staff.

4.3 ADDITIONAL INSIGHTS

4.3.1 Approval Timelines for Smaller vs. Larger Applications

The large dataset allows us to undertake an analysis of approval timelines by size of application. The data presented in Figure 4-38 below shows average approval timelines for high-density development projects, by size of project as measured by dwelling unit counts.

The data is exclusive to Ontario municipalities, and combines all 16 municipalities studied in this report, in addition to the four Ontario municipalities included in the 2022 CHBA Benchmarking Study not covered in this report (Pickering, Ottawa, Hamilton and London).

It was found that there is little to no difference in how long it is takes to gain municipal approval, regardless of development size. Among the 400+ high-density projects in our database across Ontario:

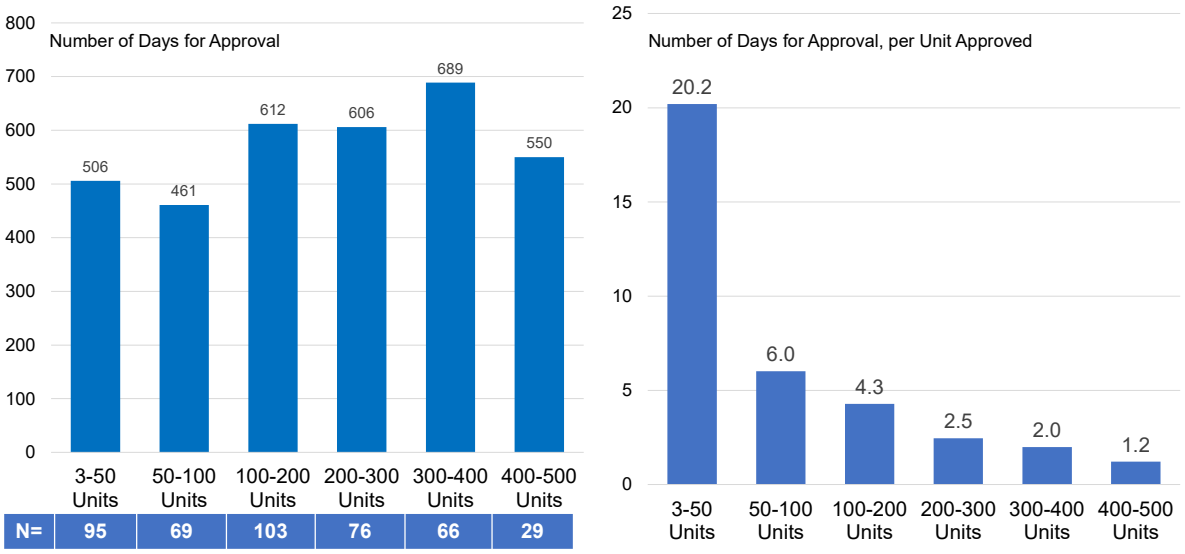
- High-density projects with 3-50 units take an average of 506 days to get approved (averaging a unit count of 25 units), meaning it takes roughly 20.2 day under review per unit to be ultimately approved;
- High-density projects with 400-500 units take an average of 550 days to get approved (averaging 451 units among them), equating to 1.2 days in review per unit approved.

Using the above averages to illustrate the implications, if a 450-unit project takes 550 days to gain approval, and similarly that every 25-unit project takes 511 days to approve, to get the same quantum of 450 units approved through separate smaller projects:

- It would take 18 separate development applications of 25-units each to reach the same unit yield as the single 450-unit project;
- Based on average review time of 511 days for each smaller project, it would take approximately 9,100 days in review (combined) to reach the same number of 450 approved units, instead of the total 550 days that the larger single project is approved in. This means that the resources needed to achieve the same 450-unit addition to the housing supply would consume 16-times the staffing resources.

Simply put, unless major changes are made to streamline approval processes for smaller applications, the extremely high ‘per unit’ time investments required by the municipal review process for smaller applications will contribute to making housing forecasts difficult to achieve and put a significant strain on finite staffing resources to review the larger, more complex files that may better merit greater attention.

Figure 4-38 **Average Timelines for Approvals, High-Density Development Projects, Ontario Municipalities**



Source: Altus Group Economic Consulting

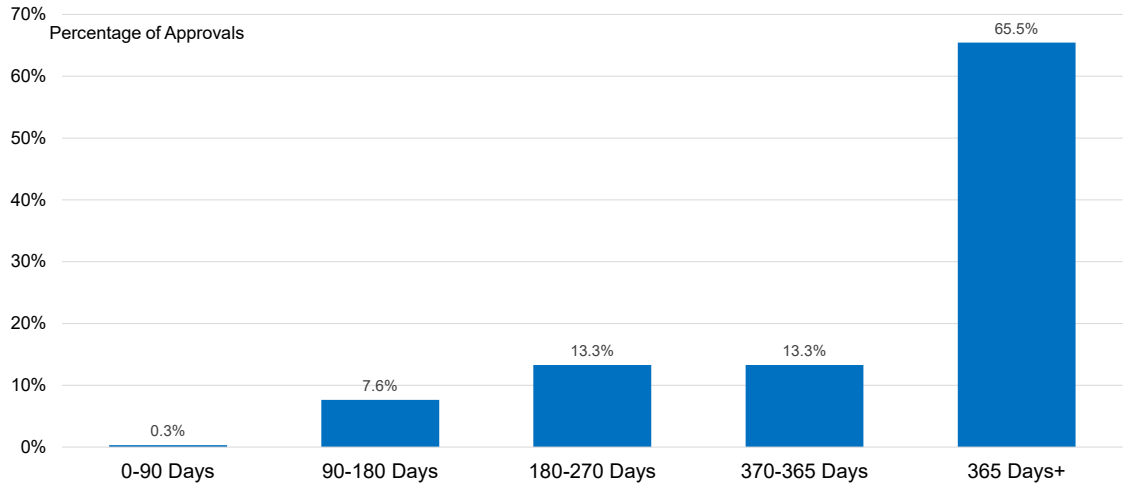
4.3.2 Planning Act Statutory Requirements and Bill 197

It was found that very few development applications meet the Planning Act statutory requirements for municipal decisions for both zoning by-law amendments ("ZBAs") or site plan agreements ("SPAs").

Just 0.3% of the ZBAs in our database were decided upon in less than 90 days (though ZBAs submitted in combination with OPAs get 120 days). Just 7.6% were approved within the 90-180 days, meaning a total of just 7.9% of all applications for ZBA were approved in 180 days or less. Nearly two-thirds of ZBAs took longer than one year to gain municipal approval.

Figure 4-39

Share of Zoning By-law Amendments Approved, by Approval Period, Ontario Municipalities



Source: Altus Group Economic Consulting

Ontario Bill 109 (More Homes for Everyone Act, 2022) would require municipalities discount planning fees payable if the statutory decision requirements are not met. While almost no applications meet the current statutory requirements, it does not appear that municipalities are often even close enough to avoid a full 100% discount on planning fees for the majority of affected applications.

The periods after which full discounts on planning fees must be provided are 210 days for ZBAs, and 120 days for Site Plan. Compared to these time periods, 73.2% of ZBAs, and 78.3% of Site Plan applications would be due full refunds.

It is noted that even though the vast majority of files exceeded statutory periods for review periods, the applications that are contained in our database were all ultimately approved by municipalities without OLT appeals for non-decision within those statutory timelines. Based on our research behind this study and other similar research elsewhere in Ontario, it is likely that there may be more private appeals of Council approvals than there are appeals by developing landowners for non-decision.

Given that both municipalities and many applicants agree that the difficulty attracting and retaining planning staff is a major issue that contributes to long approval timelines, removing three-quarters of planning application fees, which go towards funding staff salaries, is unlikely to have any positive effects on the ability of municipal planning departments to be adequately resourced to improve application timelines.

4.4 FEEDBACK FROM MUNICIPALITIES RE: APPROVAL TIMELINES

In presenting the findings of the 2020 Benchmarking Study, and in the process of communicating with municipal contacts in the research process for this study, we received significant amounts of constructive feedback regarding issues that municipalities are seeing first-hand that are impacting approval timelines.[13] These include the following:

- Rather than refusing applications, some municipalities prefer to work with applicants as long as necessary to reach a mutually agreeable development application. Many municipalities noted that a longer approval process is obviously preferable to a quick refusal;
- Resubmissions take long periods of time that can impact approval timelines, which is driven by time constraints and similar staffing issues among private consultants as found in the public sector;
- The quality of submissions (and resubmissions) was found in some cases to be poor and required significant additional staff time to steer applicants and/or their consultants in the right direction;
- In some cases, applicants submit site plan applications concurrently with rezoning applications, meaning when the rezoning is approved, the site plan review process begins even though the application date was significantly prior to the actual undertaking of the review;
- Some municipalities may, in some cases, issue conditional building permits before all plans are approved (assuming a certain level of comfort). While all final approvals may not yet be fully obtained, in these cases, construction may have already commenced despite full approval, as measured in this study, taking marginally longer;
- Some site plan applications may require minor variances from Committees of Adjustment ("CoA"). In cases where the CoA application gets appealed, the site plan timelines can be overly extended; and
- Timing for final approvals can sometimes be influenced by timing for construction and commissioning of significant capital projects (such as pumping stations, watermain extensions, treatment plan improvements, road works);

A common theme of feedback received is that municipalities are ultimately conforming to requirements of the *Planning Act* and other related statutes and regulations. Any attempts to streamline the review and approvals process are somewhat limited by Provincial requirements. The Province may need to take a more active role, in concert with municipalities and home builders, in shaping the development process to help municipalities overcome constraints imposed by legislation and regulations.

[13] Thank you to staff from the City of Richmond Hill, City of Oshawa, City of Mississauga

4.5 COSTS OF DELAY

Based on Altus Group Cost Consulting analysis, every three months of delay before construction can commence, or the longer that construction periods are drawn out, has significant implications for construction costs:

Figure 4-40

Period	Every 3 Months/Quarter:
Pre-Construction	+$8 to $10 per square foot
During Construction	+$4 to $6 per square foot from general conditions and interest on loans Plus $1 per square foot for every rise of interest rates by 100 basis points.

For a hypothetical high-density development (consistent with the scenario used in this report to model municipal charges), each month of delay equates to cost escalation of $2.60 to $3.30 per square foot per month, a 20-50% increase from the estimated per month costs in our 2020 Study.[14]

On a per unit basis, the costs of delay and resulting exposure to additional construction cost escalation amounts to $2,600 to $3,300 in additional construction costs per residential unit.

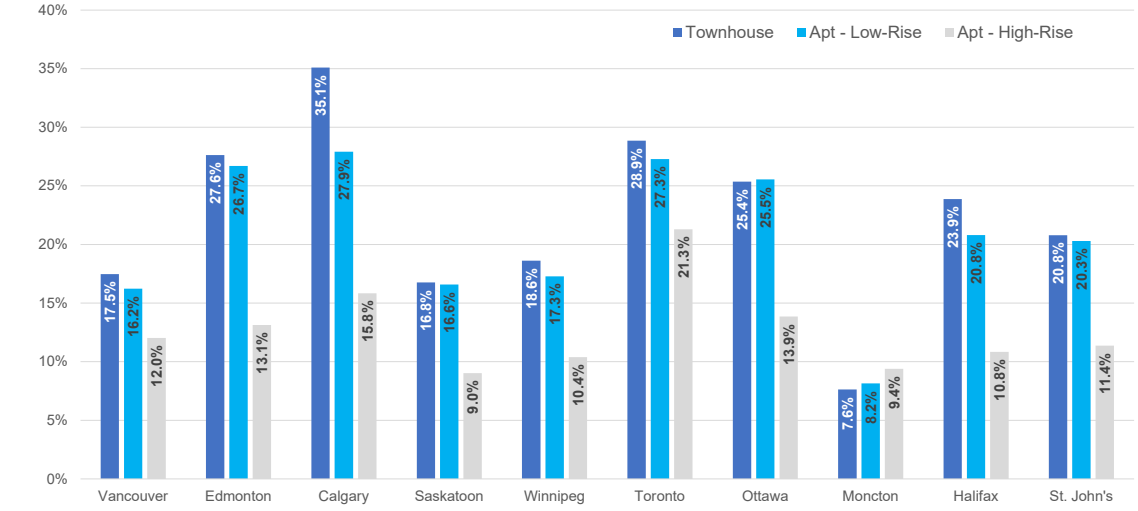
Over a 6-month period, this would amount to $16,000 to $20,000 per unit in additional construction costs associated with time spent in the development application process.

Statistics Canada data on construction costs show that in the twelve months ending Q1 2022, construction costs for residential construction have increased by an average of 22.6%, including an average of:

- +25.5% for townhouses – increases have been highest in Calgary, Edmonton and Toronto, with Calgary exceeding 35% cost increases in the last 12 months;
- +21.4% for low-rise apartment buildings – increases have been highest in Edmonton, Calgary, Toronto and Ottawa – all above 25%; and
- +17.1% for high-rise apartment buildings – increases have been highest in Toronto (+21.3%), with Calgary and Ottawa also exceeding 13% cost escalation.

[14] Our 2020 Benchmarking Study estimated the per month costs of delay amounted to $2.21 square foot per month.

Figure 4-41 **Change in Construction Costs by Residential Unit Type,**
Census Metropolitan Areas, 12 Month Change from Q1 2021 to Q1 2022



Source: Altus Group based on Statistics Canada Table 18-10-0135-01

4.6 CONCLUSIONS

Based on our research and analysis, our findings regarding municipal approval timelines can be summarized as follows:

- Approval times have worsened for most municipalities, and for all application types. Overall, average timelines have increased by 41% since the 2020 Study, and between 27-53% depending on application type;
- The best average approval timelines were found in Milton, Whitby, Barrie, Oakville and Brampton, each below 16 months on average from date of application to approval;
- The worse average approval timelines were found in Caledon, Toronto, Richmond Hill, and Vaughan, each with average approval timelines 27 months or greater;
- Approval times are as long for smaller applications as they are for larger applications. On a per-unit basis, they occupy a disproportionate amount of staff time, which could have serious implications for staffing requirements if smaller-scale development is being more heavily relied upon to address overall housing supply issues, unless the process is significantly simplified for these applications;
- Time spent in approvals process has significant implications for building costs. Each month period of delay is estimated to result in $2.60 to $3.30 per square foot in additional construction costs at a time when construction cost escalation continues to accelerate; and

- Municipal feedback indicates that key issues to improving approval timelines include staffing resources, turnaround times for resubmissions, and conforming to requirements in the *Planning Act* and other related statutes and regulations. Attempts to streamline the review and approvals process are somewhat limited by Provincial requirements. The Province may need to take a more active role, in concert with municipalities and home builders, in shaping the development process to help municipalities overcome constraints imposed by legislation and regulations.

5 MUNICIPAL CHARGES ON NEW HOUSING

This section provides details on the various municipal charges levied on newly built homes that are charged to developers, home builders, and/or purchasers of newly built homes. The charges reviewed include those levied by single-tier, lower-tier and/or upper-tier municipalities and school boards.

5.1 OVERVIEW OF MUNICIPAL CHARGES ON NEW HOMES IN THE GTA

5.1.1 Municipal Development Charges

The Ontario *Development Charges Act* grants authority to municipalities to enact a development charges by-law to impose a charge against land to be developed where the development will increase the need for municipal services, thus offsetting capital costs.

Municipal development charges ("DC") collect funds for services deemed as being eligible in the *Development Charges Act*, such as Parks & Recreation, Libraries, Fire Services, Police Services, Water, Sewer, Roads, Transit, etc. Where there is both an upper-tier and lower-tier municipality, the services included in each respective municipality's DC by-law are based on which tier is the provider of each service.

Each of the lower-tier/single-tier municipalities reviewed in this report imposes development charges for a variety of services. As required under the *Development Charges Act*, DC by-laws are to be reviewed at least every five (5) years. In the interim periods between DC by-law reviews, DC rates are indexed either annually or semi-annually based on a prescribed Statistics Canada construction price index.

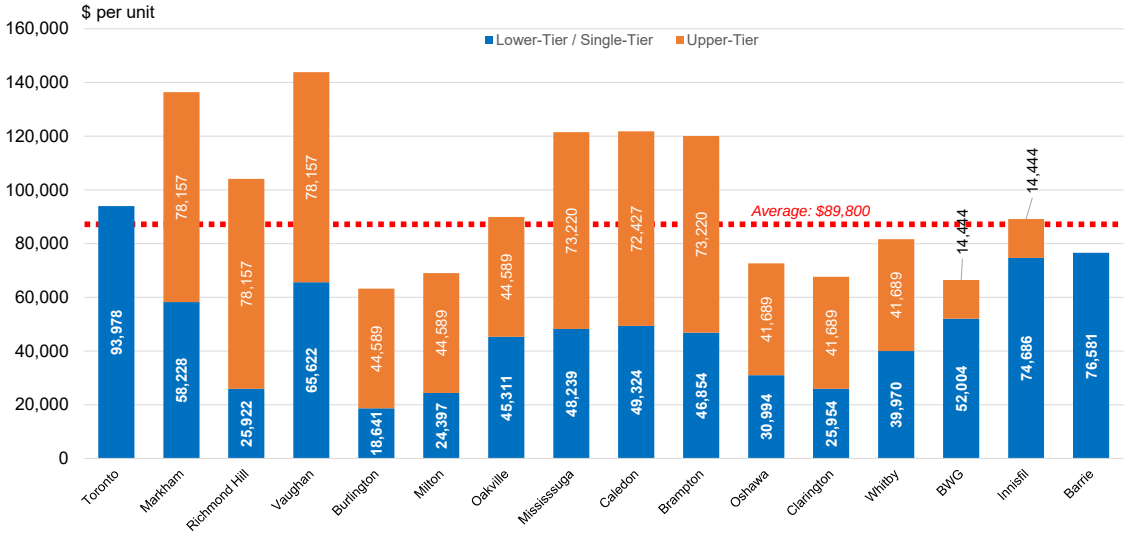
While many municipalities have recently adopted new DC rates, and in some cases have phased them in over several months or years (such as in the City of Toronto), our analysis only accounts for the in-force DC rates as of August 2022.

Figure 5-42 shows the current development charge rates in the study municipalities, expressed on a per single-detached unit basis[15], including both lower-tier DC rates, or single-tier DC rates in the case of Barrie and Toronto, and upper-tier DC rates. The combined DC rates exceed $100,000 in six (6) municipalities - all three (3) municipalities studied in York Region and all three (3) within Peel Region. The highest DC rates are in the City of Vaughan, with the City and Regional DC rates amounting to $143,779 per single-detached unit. The average DC rates per single-detached unit across all study municipalities is $89,800 per unit.

[15] DC rates are based on a calculation of 'per capita' DC rates, converted into specific DC rates by unit type by multiplying DC rates per capita by estimates of average household sizes by unit type.

Figure 5-42

Development Charge Rates (as of August 2022), Study Municipalities, per Single-Detached Unit

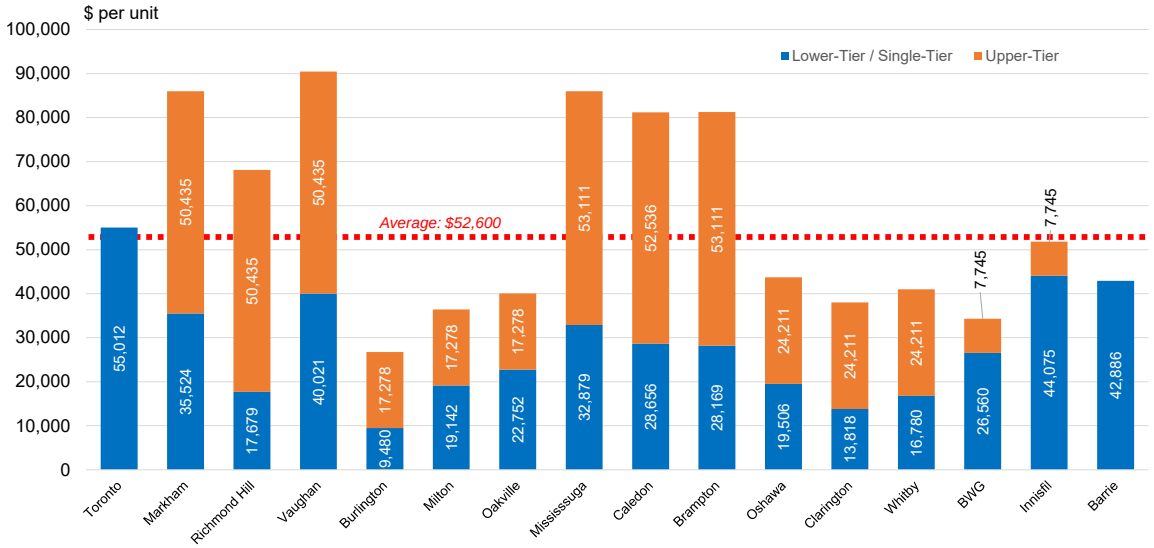


Source: Altus Group Economic Consulting

Figure 5-43 shows the DC rates for two-bedroom apartment units in each municipality. DC rates for two-bedroom apartment units exceed $70,000 per unit in five (5) municipalities - Markham, Vaughan, Mississauga, Caledon and Brampton. The average DC rate for two-bedroom apartments across all study municipalities is $52,600 per unit.

Figure 5-43

Development Charge Rates (as of August 2022), Study Municipalities, per Two-Bedroom Apartment Unit



Source: Altus Group Economic Consulting

5.1.2 GO Transit Development Charges

Development charges are also levied to collect funds for growth-related projects associated with the GO Transit system. Most regions in the Greater Toronto Area have been allocated a share of the projected growth-related capital costs associated with the GO Transit system, with the municipal, provincial and federal governments each funding one-third shares of the total capital costs.

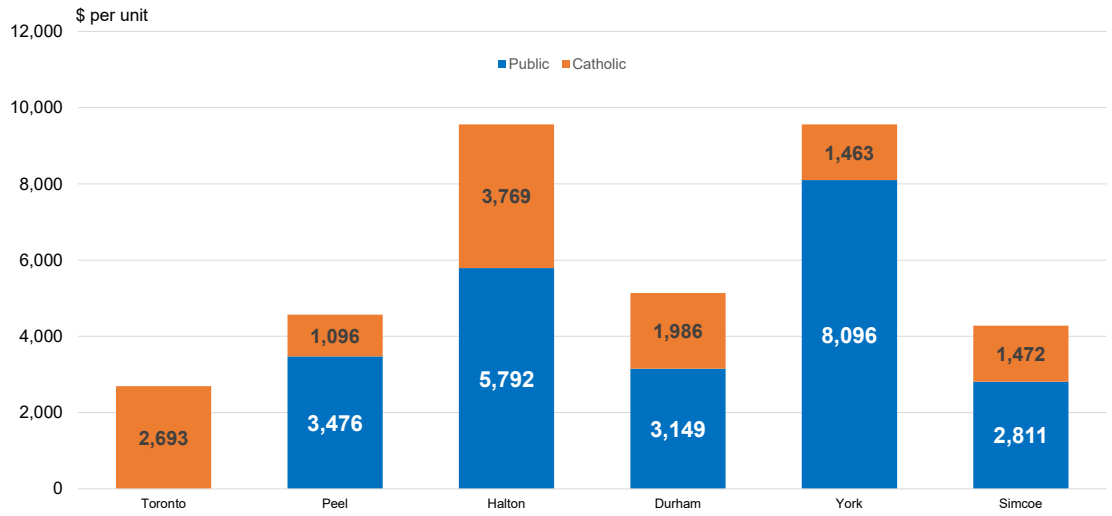
The GO Transit development charge was originally approved for a two-year period, with the by-laws expiring December 31, 2003. Since then, the GO Transit development charges have been updated regularly to fund a rolling ten-year budget.

5.1.3 Education Development Charges

In Ontario, education development charges ("EDCs") are collected by local municipalities on behalf of local school boards that qualify to impose such charges under the *Education Act* and associated regulations. EDCs are used by school boards to fund the acquisition of school sites and related costs (site preparation, legal costs, etc.) to accommodate net new growth-related to pupils.

Figure 5-44

Education Development Charge Rates (as of August 2022), by Region



Source: Altus Group Economic Consulting

Costs associated with construction of school buildings are funded by the Province on a case-by-case basis. On-going funding for repairs and general maintenance of schools are funded by the Province, with funds generated by the education portion of property tax bills, an important source of on-going

and stable funding for such maintenance-related costs that arise whether new development occurs or not.

EDCs on residential development are imposed solely on a per unit basis, meaning that single-detached units are charged the same rate as townhouse and apartment units. The *Education Act* and associated regulations enable school boards to impose these charges on a differentiated basis (i.e., higher rates for single-detached units, lower for apartment units), but to-date, this approach has not been utilized.

In recent years, the Province has instituted a policy that limits EDC rate increases to the greater of 5% or $300 per unit, per year.

5.1.4 Planning & Approval Fees

There are various fees and charges associated with the municipal approval for a development, several fees for the permits required for the construction of the building(s), and engineering fees and permits for the infrastructure works associated with a development.

These fees are sometimes grouped by municipalities into three main categories of fees – planning review/application fees, building permit fees, and engineering fees. In many municipalities, there is no clear delineation between the departments that review plans, approve plans, and/or issue permits, meaning that in some cases, engineering review fees may be covered within the costs recovered through planning review fees. Within our estimate of “Planning and Approval” fees is the following:

5.1.5 Parkland Dedication / Cash-in-Lieu of Parkland

Municipalities acquire parkland and other forms of open space through parkland dedication requirements imposed on new developments. Alternatively, a developer can provide “cash-in-lieu” (“CIL”) of parkland dedication to a municipality.

The *Planning Act* says that as a condition of development or redevelopment of land, that land in an amount not exceeding 5% of the land to be conveyed to the municipality for park or other public recreational purposes. Alternatively, for residential developments, the land conveyed to the municipality may also be provided at a rate of 1 hectare per 300 dwelling units.

The *Ontario Planning Act* also says that in lieu of providing the land for parkland to the municipality, the developer may instead provide a payment to the municipality in the amount of the value of the land to be conveyed, at a rate not to exceed 1 hectare per 500 dwelling units. The value of the land is to be determined as of the day before approval of the draft plan of subdivision.

Many municipalities in the GTA have undertaken reviews of their Parkland Dedication by-laws and cash-in-lieu policies. This study reflects the latest information available as of September 2022 for adopted Parkland by-laws and for by-laws that have not-yet-been adopted but were formally proposed and recommended for adoption. For the purposes of our analysis, we have utilized the full proposed/adopted Parkland CIL rates set out in by-laws.

5.1.6 Section 37 / Community Benefits Charges

Under Bill 108 and Bill 197, the former Section 37 density bonusing system was effectively replaced with a Community Benefits Charge ("CBC"), which would see an amount payable equivalent to 4% of land value (as of the day before building permit) for developments with both 10 or more residential units that are also 5 or more storeys in height. Whereas the former Section 37 density bonusing applied to many, but not all developments, the forthcoming CBC will apply to all developments exceeding the height and unit thresholds (5 storeys and 10 units). As a result, the application of CBCs is likely to be far broader than the former Section 37.

While many municipalities have not yet adopted CBC rates, most municipalities examined anticipate adopting a CBC by-law by September 2022, and for those municipalities, the latest proposals have been accounted for in our modelling, with most municipalities opting to impose the full 4% CBC against land value of the development, though some have adopted fixed per-unit CBC rates (e.g. Burlington).

5.1.7 Land Transfer Taxes

Land transfer taxes ("LTT") are levied by the Province of Ontario, and so those charges are not included in our modelling of charges imposed by municipalities.

However, the City of Toronto, under authority granted to it by the *City of Toronto Act*, does levy its own municipal land transfer tax. The Toronto Municipal Land Transfer Tax is imposed on the value of property being transferred from a seller to a buyer, at rates of:

- Value up to $55,000 – 0.5%;
- Value from $55,000 to $250,000 – 1.0%;
- Value from $250,000 to $400,000 – 1.5%;
- Value from $400,000 to $2,000,000 – 2.0%; and
- Value over $2,000,000 – 2.5%.

No other municipality among those studied in this report levies a municipal land transfer tax.

5.1.8 Other Government Charges Not Included in this Report

5.1.8.1 Provincial and Federal Charges on New Homes – HST, Land Transfer Taxes, CMHC Mortgage Insurance

Government charges levied on new homes by the Provincial or Federal governments are not included in this report, as the focus of the analysis is on charges and fees levied by municipalities. Therefore, charges such as the provincial land transfer tax, sales taxes (provincial and federal), and CMHC mortgage insurance are not included in this study.

However, unlike municipal charges, which are typically incurred by the developer, which are ultimately passed onto new homebuyers through prices, the charges levied or required by upper levels of government are typically incurred directly by homebuyers, and so also has a significant impact on the affordability of housing in Canada.

5.1.8.2 Inclusionary Zoning

Many municipalities have in the past two (2) years adopted (or will soon adopt) inclusionary zoning ("IZ"), such as the City of Toronto and the City of Mississauga, with many others likely following suit in the coming months (e.g. Richmond Hill, Burlington, Brampton, etc.)

The model used in this report does not include costs associated with IZ for several reasons:

1) Many municipalities that are likely to adopt IZ policies have not yet released enough information to attempt modelling the cost implications;
2) The municipalities that have adopted IZ policies are often providing significant transition for otherwise eligible applications and so while IZ may be adopted, applications submitted in mid-2022 would not yet be subject to IZ requirements;
3) Where IZ is adopted, beyond the transition for applications submitted on a certain date, the municipalities have adopted a phased-in approach with set-aside rates increasing over a multi-year period;
4) While some municipalities have adopted IZ policies, many of them have stated that the incentives may be provided through other instruments that have not yet been finalized (DC by-laws, CBC by-laws, Community Improvement Plans, etc.); and
5) Estimating the costs of IZ, through the modelling of lost revenues and impacts on pricing, is an extremely detailed calculation depending on set-aside rates, terms of affordability, determination of market rental rates, calculation of affordable prices/rents, discount rates, rent escalation rate assumptions, etc, Given that only a few municipalities have adopted or have released firm proposals for their approach to IZ, at this point, the

modelling would be too speculative to rely on for the purposes of this report.

Where IZ by-laws have been adopted, estimates of costs of the policy on the market units within a development range from $25,000 to $60,000 per unit. This would make IZ the second or third most significant municipal-imposed cost along with Development Charges and Parkland Dedication/CIL, depending on the municipality.

5.2 QUANTIFICATION OF MUNICIPAL CHARGES AND FEES

This subsection of the report aims to provide a high-level overview of the charges levied by municipal governments on new development and attempts to quantify the costs these charges and fees payable by developers, builders, and, ultimately, home buyers.

5.2.1 Scenarios

To model and estimate the charges and fees imposed by the municipalities studied in this report, we have devised two development scenarios – one 'low-rise' consisting of a mix of single-detached and townhouses, and one 'high-rise' consisting of a condominium apartment building.

Figure 5-45

Feature	Low-Rise Scenario	High-Rise Scenario
Unit Types	75 single-detached, 50 townhouses	125 condominium apartment units (75 2+bedrooms, 50 bachelor and 1-bedroom)
Land Area	6.91 hectares (17.06 acres)	0.52 hectares (1.29 acres)
Unit Sizes	Single-detached: 2,500 sf Townhouses: 1,800 sf	Large apartments: 900 sf Small apartments: 650 sf

5.2.2 Low-Rise Findings

Our modelling of charges imposed on low-rise development was done for all 16 municipalities included in the study. The charges imposed amount to an average of $116,900 per unit, or $53 per square foot ("SF"), for the municipalities studied.

Figure 5-46 **Municipal Charges per Unit, Low-Rise Scenario, Greater Toronto Area Municipalities**

Rank	Municipality	Low-Rise Charges per Unit	Low-Rise Charges per SF
		$ / Unit	*$ / SF*
1	City of Toronto	189,325	85
2	Vaughan	168,375	76
3	Markham	162,348	73
4	Mississauga	143,439	65
5	Richmond Hill	129,459	58
6	Brampton	126,907	57
7	Caledon	126,552	57
8	Oakville	113,635	51
9	Innisfil	103,078	46
10	Whitby	95,485	43
11	Burlington	90,596	41
12	Barrie	89,057	40
13	Milton	88,856	40
14	Oshawa	84,966	38
15	Clarington	80,315	36
16	BWG	77,527	35
	Average	116,870	53

Source: Altus Group Economic Consulting

The results vary significantly by municipality – from $77,500 per unit in BWG to $189,300 in the City of Toronto. The municipalities with the seven (7) highest charges are all located in Toronto, York Region or Peel Region. The lowest nine (9) municipalities in the ranking are in Halton, Durham regions and the Simcoe area.

5.2.3 High-Rise Findings

Our modelling of charges imposed on high-rise development was done for all 16 municipalities included in the study. The charges imposed on high-rise developments vary widely by municipality – from $46,400 in Oshawa to $121,600 in Vaughan. Similar to the low-rise scenario, the seven (7) municipalities with the highest charges were in York Region, Peel Region or the City of Toronto.

The charges amount to an average of $79,100 per unit, or $99 per SF. Seven (7) municipalities had charges over $100 per SF - Vaughan, Markham, Mississauga, Richmond Hill, Toronto, Caledon and Brampton, with the highest being $152 per SF in Markham.

Having the largest high-rise charges per unit in Toronto, the three (3) York Region municipalities, and the City of Mississauga speaks to the impact that high urban land values have on municipally imposed charges. Development

charges, parkland CIL, and CBCs all include land costs as part of their calculation methodology or are directly related to land values to varying degrees, which will be explained in greater detail later on in the chapter.

Figure 5-47

Municipal Charges per Unit, High-Rise Scenario, Greater Toronto Area Municipalities

		High-Rise	
		Charges per Unit	Charges per SF
Rank	Municipality	*$ / Unit*	*$ / SF*
1	Vaughan	121,562	152
2	Markham	110,892	139
3	Mississauga	105,569	132
4	Richmond Hill	101,349	127
5	City of Toronto	99,894	125
6	Caledon	87,280	109
7	Brampton	79,645	100
8	Milton	77,778	97
9	Oakville	74,636	93
10	Innisfil	70,648	88
11	Barrie	60,464	76
12	Burlington	60,382	75
13	Clarington	58,202	73
14	Whitby	57,683	72
15	BWG	53,845	67
16	Oshawa	46,412	58
	Average	79,140	99

Source: Altus Group Economic Consulting

5.3 COMPARISON OF LOW-RISE WITH HIGH-RISE SCENARIO RESULTS

Based on our modelling and scenario, the charges per square foot for high-rise development tend to be roughly 90% higher than they are for low-rise. Given that our high-rise scenario is more akin to a mid-rise building (125 units on a 0.52-hectare site), the charges for true high-rise development (20 to 40 storeys or higher) are often even higher on a per square foot basis than presented here.

The charges for both low-rise and high-rise tend to be highest in municipalities like Toronto, South York Region and Mississauga/Brampton.

The main driver of both trends is the impact and influence that high land values have on municipal charges.

- Most parts of municipal development charge rate calculations are done by taking existing service levels (as measured in $/per capita) to set what the DC rates need to be to meet (but not exceed) those existing service levels. However, as GTA land values continue to escalate, particularly in Toronto, York and Peel, an increasing proportion of the existing ‘service

levels' is made up of land values underlying municipal assets, such as recreation centres, libraries and most importantly road networks. This serves to inflate DC rates and is why DC rates tend to be highest in high-land value environments. This, and the significant capital costs associated with building infrastructure in more urban areas (particularly rail-based transit) and acquiring land for capital works (fire stations, libraries, recreation centres, etc.) in urban areas serves to inflate DC rates and is why DC rates tend to be highest in high-land value environments.

- Unless a municipality chooses to utilize some sort of 'cap' on Parkland CIL, the effect of high land values results in significantly higher Parkland CIL costs for high land-value municipalities. Parkland acquisition costs in urban environments and intensification areas is generally higher than in greenfield environments.
- Community Benefits Charges are directly based on land value, with most municipalities using the full 4% cap set out in regulations. Since CBCs are only imposed on development with 5-or-more storeys and 10-or-more units, ground-related housing forms do not qualify for the charge.

Figure 5-48

Ratio of Municipal Charges per SF, Low-Rise vs High-Rise Scenarios

		Charges per SF		
		Low-Rise	High-Rise	Ratio
Rank	Municipality	*$ / Square Foot*		*HR / LR*
1	Vaughan	76	152	2.0
2	Markham	73	139	1.9
3	Mississauga	65	132	2.0
4	Richmond Hill	58	127	2.2
5	City of Toronto	85	125	1.5
6	Caledon	57	109	1.9
7	Brampton	57	100	1.7
8	Milton	40	97	2.4
9	Oakville	51	93	1.8
10	Innisfil	46	88	1.9
11	Barrie	40	76	1.9
12	Burlington	41	75	1.8
13	Clarington	36	73	2.0
14	Whitby	43	72	1.7
15	BWG	35	67	1.9
16	Oshawa	38	58	1.5
	Average	53	99	1.9

Source: Altus Group Economic Consulting

Note: the ratio of high-rise charges to low-rise charges per SF would be even higher had costs associated with IZ been included in our modelling. IZ

requirements can result in significant additional costs on higher-density housing developments, and IZ is not imposed on low-rise housing.

Municipal charges modelled being nearly double for high-density developments on a per square foot basis than for ground-oriented forms of housing creates additional disadvantages for high-rise developments as they already face numerous other headwinds from a feasibility perspective:

- Construction costs are significantly higher (on a per square foot basis) for high-density compared to low-density.
- Prices tend to be lower on a per unit basis for apartments than for townhouses and single/semi-detached housing, leaving less flexibility to absorb municipal charges. While the market may set the sales price for units, increasing municipal imposed charges (likewise for any other development costs, such as hard construction cost) pushes the cost 'floor' high enough to make many projects infeasible even at existing market prices. As a result, projects will not proceed, which negatively impacts supply; and

The findings that both construction costs and municipally imposed charges and fees are substantially higher for high-density housing puts at risk municipal and provincial objectives for promoting high-density development taking on an increased proportion of the total housing supply in GTA communities.

5.4 COMPARISON WITH 2020 STUDY

5.4.1 Low-Rise

As compared to our 2020 Study, the average municipal charge on low-rise development has increased by 30% since the 2020 Study, increasing from $89,900 per unit to $116,900 per unit, or an increase of nearly $27,000 per unit.

It is noted that this per unit average is a weighted average blend of municipal charges on a scenario containing a mix of single-detached units and townhouses, with our low-rise scenario including 75 single-detached units and 50 townhouse units.

It was found that municipal charges increased for all 16 study municipalities, with increases ranging from 18% to 43% over the two-year span since our 2020 Study.

In our 2020 study, six (6) of the 16 municipalities had low-rise charges that exceeded $100,000, and two had charges that exceeded $125,000 per unit. In this study, nine (9) of the 16 municipalities now have charges that exceed $100,000 per unit, and seven exceed $125,000.

Figure 5-49 **Municipal Charges per Unit, Low-Rise Scenario, Greater Toronto Area Municipalities**

		Low-Rise		
		2020	2022	% Change
Rank	Municipality	*$ / Unit*		
1	City of Toronto	156,117	189,325	21%
2	Vaughan	132,758	168,375	27%
3	Markham	120,372	162,348	35%
4	Mississauga	113,109	143,439	27%
5	Richmond Hill	106,327	129,459	22%
6	Brampton	100,172	126,907	27%
7	Caledon	91,627	126,552	38%
8	Oakville	84,211	113,635	35%
9	Innisfil	73,181	103,078	41%
10	Whitby	67,548	95,485	41%
11	Burlington	63,202	90,596	43%
12	Barrie	75,199	89,057	18%
13	Milton	66,724	88,856	33%
14	Oshawa	66,594	84,966	28%
15	Clarington	57,606	80,315	39%
16	BWG	63,093	77,527	23%
	Average	89,865	116,870	30%

Source: Altus Group Economic Consulting

5.4.2 High-Rise

As compared to our 2020 Study, the average municipal charge on low-rise development has increased by 36%, increasing from $59,200 per unit to $79,100 per unit, or an increase of nearly $20,000 per unit.

It is noted that this per unit average is a weighted average blend of municipal charges on small and large apartments, with our high-rise scenario including 75 two-bedroom units and 50 one-bedroom units.

It was found that municipal charges increased for all 16 municipalities studied, with increases ranging from 20% to 50% over the two-year span since the last study.

In the 2020 Study, no municipality exceeded $100,000 per unit for high-rise units, but in this study, five (5) municipalities have charges that exceed the $100,000 threshold.

Figure 5-50 **Municipal Charges per Unit, High-Rise Scenario, Greater Toronto Area Municipalities**

		High-Rise		
		2020	2022	% Change
Rank	Municipality	*$ / Unit*		
1	Markham	85,731	129,235	51%
2	Vaughan	81,216	121,562	50%
3	Mississauga	75,859	105,569	39%
4	Richmond Hill	80,281	101,349	26%
5	City of Toronto	76,378	100,156	31%
6	Caledon	59,240	87,280	47%
7	Brampton	57,724	79,645	38%
8	Milton	53,823	77,778	45%
9	Oakville	60,526	74,636	23%
10	Innisfil	52,940	70,648	33%
11	Whitby	46,376	62,776	35%
12	Barrie	48,523	60,464	25%
13	Burlington	50,328	60,382	20%
14	Clarington	40,570	58,202	43%
15	BWG	40,958	53,845	31%
16	Oshawa	36,206	46,412	28%
	Average	59,168	80,621	36%

Source: Altus Group Economic Consulting

5.5 CONCLUSIONS

Based on the modelling done on the two hypothetical development scenarios, there are significant municipally imposed charges on new development, but that these charges can vary significantly from one place to the next. Charges imposed by municipalities on new housing development are generally the highest in Toronto and municipalities within York Region and Peel Region.

- For the municipalities studied, the average charges imposed on our low-rise scenario amount to $116,900 per unit or $53 per square foot;
- The charges for low-rise scenario range from $77,500 per unit in BWG to $189,300 in the City of Toronto. The municipalities with the seven highest charges are all located in Toronto, York Region or Peel Region. The lowest nine municipalities in the ranking are in Halton, Durham regions and the Simcoe area;
- The charges imposed on high-rise developments also vary widely by municipality, and average $79,100 per unit or $99 per square foot;
- The charges for the high-rise scenario range from $46,400 per unit in Oshawa to $121,600 in Vaughan. Similar to the low-rise scenario, the seven (7) municipalities with the highest charges are in York Region, Peel Region or the City of Toronto;

- Compared to our 2020 Study, the average municipal charge on low-rise development has increased by 30%, while high-rise charges have increased by 34%. The 34% increase for high-rise does not include the cost implications of inclusionary zoning policies that have been adopted in some municipalities, with more likely to come in the coming months;
- In our 2020 study, six (6) of the 16 municipalities had low-rise charges that exceeded $100,000, and two (2) had charges that exceeded $125,000 per unit. In the current study, nine (9) of the 16 municipalities now have charges that exceed $100,000 per unit, and seven (7) exceed $125,000;
- In the 2020 Study, no municipality exceeded $100,000 per unit for high-rise units, but in this study, four (4) municipalities have charges that exceed the $100,000 threshold; and
- The charges for high-rise development, on a per square foot basis are 90% higher than for low-rise development. Higher charges for high-density housing, which is already more expensive to build from a construction cost perspective, puts municipal objectives for increased intensification and infill development at risk. If the municipal costs (or any other type of costs, such as hard construction costs) increase to the point that projects are infeasible at existing prices, even if the market ultimately determines the selling price, higher costs of all kinds can have a direct impact on housing supply and housing affordability.

6 TRENDS, RECENT INITIATIVES AND EMERGING IDEAS

This section of the report scans for best practices or emerging for improving municipal processes, increasing transparency, and monitoring performance. While this study is generally limited to the municipalities studied, the scan in this section includes any community within Ontario that may be undertaking positive steps towards improving municipal approval processes.

6.1 FORCED CHANGE DRIVEN BY COVID-19 PANDEMIC

The 2020 Municipal Benchmarking Study did not include a review of 'Electronic Submission and Payment Capabilities' that was discussed in section 3.2.3. This review was added to this edition of the benchmarking study for the purposes of trying to capture some of the direct impacts that the COVID-19 pandemic had on the application process. Most municipalities were forced to adopt some sort of online system (e.g. web portal, email, electronic drop box, etc.), or other alternative physical retention mechanism[16], to handle the intake of development applications or building permits out of necessity for the health and safety of their staff.

Conversations with municipal staff has showed that the move to an online system generally has been a positive move by:

- Providing enhanced customer service and convenience;
- Allowing for a more efficient tracking and administration of permits/applications; and
- Allows for remote work, which is a beneficial option to have in case of office closures or to attract/retain talented staff members that require hybridized work as a condition of employment.

In addition, conversations with development industry stakeholders have shown that the move to online portals for development and planning applications is a positive one in that it reduces the requirements to provide paper-based documents and allows employees, contractors, or consultants to do administrative work later in their workday rather than taking time out of their schedules to submit documents in-person at the municipal offices.

The potential impacts of moving of online submission systems on approval timelines are not yet known. This is because many applications submitted after March 2020 have not been approved yet, particularly those in the last 12 months that may have seen the benefits of the new system once both applicants and staff ironed out early issues with the transition.

[16] Some municipalities, including those not within this study, in some instances relied on physical drop boxes where staff where able to collect paper documents without directly physically interacting with applicants.

6.2 TORONTO – CONCEPT 2 KEYS

The City of Toronto has undertaken a review of their development application review process through a program called 'Concept 2 Keys' ("C2K"). This program was created to transform organizational structures, processes, and technology.

One element of the C2K program is a set of criteria to prioritize certain development applications that include provision of affordable housing. The City found that this prioritization leads to a savings of three weeks of staff review time over all other development applications in the City:

> A significant contributor to the overall time required to secure approvals for City staff to review applications and provide comments for revisions. Within the affordable housing review stream, the average time for City staff to review and provide comments to the applicant has been five weeks per round of review. This compares to an average duration of eight to nine weeks per review round for all development applications across the City.

Some of the technological improvements include:

- Application Submission Tool;
- File Circulation Platform; and
- Online Mapping and Analysis Tool

The City's C2K program also provides a very useful application tracking dashboard for affordable housing developments throughout the City, with those applications receiving priority development review. The June 2022 version of the dashboard, which was presented to the City's July 5 Planning and Housing Committee,[17] shows the types of planning applications required for the development applications, status by development stage (complete application, planning approval, building permit approval), with specifics provided for each individual application, including unit counts, stage of approvals, circulation time and applicant response time.

The above is an example of a municipality undertaking an in-house review of municipal processes that affect the ability to approve and deliver new housing supply. There are certainly other municipalities in the GTA undertaking similar exercises, however, to avoid repetition, only the one example of such a process review is covered here.

6.3 MISSISSAUGA – MTSA DASHBOARD

The City of Mississauga has introduced a dashboard tool that provides information on existing and planned densities for each Major Transit Station

[17] City of Toronto C2K Priority Development Stream, Program Dashboard (June 20, 2022) https://www.toronto.ca/legdocs/mmis/2022/ph/bgrd/backgroundfile-227731.pdf

Area (“MTSA”) in the City, as set out in Provincial and municipal policy to achieve minimum densities to support existing and planned public transportation services in the area.

The City’s dashboard provides detailed boundary information, population and employment estimates, and useful links to relevant City and Regional policies as well as planning studies. The tool enables users to add mapping layers such as existing land uses and other planning boundaries.

6.4 CHIEF PROVINCIAL PLANNER / INDEPENDENT PLANNING AUDITOR

The Ontario Professional Planners Institute (“OPPI”) released a set of recommendations to tackle issues in the Province related to housing supply and affordability.

The first recommendation was to ‘Create an Office of the Chief Planner of Ontario’ (“CPO”) as an independent, non-partisan Office of the Legislative Assembly”, with the objective of being able to:

> …provide oversight of municipal implementation of provincial land use plans and policies.[18]

The basis for the recommendation comes from the OPPI’s findings that:

- Minimal information is available on the outcomes of policies associated with the Growth Plan for the Greater Golden Horseshoe. The Province has only once reported on municipal implementation progress since the Plan’s inception;
- Many municipalities are falling short of targets in the Plan. Only four (4) of the 25 Urban Growth Centres are on pace to meet their density targets by 2031; and
- Municipalities receive insufficient guidance on how to implement policies in provincial plans. In a survey of municipal planners, 70% of respondents said they lacked sufficient guidance or direction from provincial staff.

Under OPPI’s recommendation, the CPO would:

- Oversee and provide advice to municipalities on the implementation of provincial planning policy;
- Publish an annual report on progress towards meeting provincial growth targets, and identify which policies or targets are not being met;
- Provide recommendations to municipalities that are misaligned with provincial plans; and

[18] Ontario Professional Planners Institute, https://ontarioplanners.ca/OPPIAssets/Documents/Policy-Papers/OPPI_Top_10_Recommendations.pdf

- Assist in resolving differences among Provincial ministries on land use planning policies and plans at a municipal level.

6.5 ESTABLISHING POPULATION/DENSITY TARGETS FOR EXISTING NEIGHBOURHOODS EXPERIENCING POPULATION DECLINES

Ontario's *Places to Grow: Growth Plan for the Greater Golden Horseshoe* (the "Growth Plan") imposes minimum densities for numerous elements of a municipality's urban structure, including:

- Minimum densities for Urban Growth Centres;
- Minimum densities for new Designated Greenfield Areas; and
- Minimum densities for Major Transit Station Areas.

While there are requirements to plan for a minimum percentage of new housing units in a municipality to be directed to the existing built-up area, the Growth Plan does not impose any density or population targets for existing neighbourhoods. The Growth Plan contains a policy to "encourage intensification generally throughout the delineated built-up area", but largely most intensification and infill development is directed to Urban Growth Centres, Major Transit Station Areas, or other major intensification areas.

However, while population growth is surging in many Urban Growth Centres, Major Transit Station Areas (MTSAs) and some transit corridors, population is declining in many mature GTA neighbourhoods, significantly so in many cases. This is not a recent phenomenon (5 or 10 years), but rather for many places that recorded their peak population 30-40 years ago and have been steadily declining since.

The ongoing declines in population within existing mature neighbourhoods places significant additional pressure on other parts of a municipality to take on all of the necessary housing growth to not only see a municipality grow but to also, in part, make-up for the lost population in existing neighbourhoods relative to their original designed capacity.

Adding housing to existing built-up neighbourhoods that have experienced population decline can help ensure that they maintain population stability and utilize existing available public services and infrastructure as they were designed, rather than leaving excess capacity that is left unused, while major infill and intensification areas require a full set of infrastructure upgrades. This combination is an inefficient use of public resources in an environment where infrastructure costs are appreciating at an accelerated rate.

6.6 PLANNING INFORMATION RETURN ("PIR")

Several provinces have annual financial statements that municipalities submit to their respective provincial ministry. In Ontario, Financial Information Returns ("FIRs") are an annual form of standardized reporting of a

municipality's financial activities. The purpose of these returns is to provide the public and ministry staff an overview of the fiscal standing of each municipality with accounting standards that permit an 'apples-to-apples' comparison.

A key takeaway from conducting the necessary research to undertake this study is the amount of work it takes to compare municipalities on performance related to things such as, approval timelines, number of units approved, under application, the amount of municipal owned lands or vacant employment lands, etc.

Issues about the availability of planning data to enable better evidence-based decision making was also highlighted by the Auditor General of Ontario's report[19] in 2021 on land-use planning practices in the province.

All this suggests that the time has come to implement a 'Planning Information Return' ("PIR"), which would follow the same principle as an FIR. The concept envisions a yearly report, like FIRs, providing the province and the public data on various planning metrics with established standards.

The State of Victoria in Australia provides some guidance how unified reporting standards can be created as they have an existing established monthly reporting system called the 'Planning Permit Activity Reporting System' ("PPARS").

Some Canadian provinces have also already begun this process. According to the Rural Municipalities of Alberta[20], one of the non-legislative changes their province implemented through its Red Tape Reduction Act in 2020 was to require municipalities to report development and subdivision approval timelines. Section 577(2) in Alberta's Municipal Government Act empowers the minister to direct a municipality to provide any information or statistics within a prescribed timeframe. The statistical information return ("SIR") section in Alberta's municipal FIRs for 2020 and 2021[21] provide several planning metrics, including:

- Date of the last time a Municipal Development Plan was approved;
- Number of development permits applications received;
- Number of development permits issued;
- Average number of days from a development permit application to approval;
- Number of building permits issued;

[19] *Value-for-Money Audit: Land-Use Planning in the Greater Golden Horseshoe (2021)*

[20] Rural Municipalities of Alberta*. Bill 48 Introduces Changes to Municipal Planning and Development*. https://rmalberta.com/news/bill-48-introduces-changes-to-municipal-planning-and-development/

[21] The FIR for 2022 was not available at the date of this report

- Number of subdivision applications received;
- Number of subdivision applications approved;
- Average number of days from subdivision application to approval;
- Number of amendments to the land use bylaw; and
- Number of Subdivision and Development Appeal Board appeals heard.

One weakness of Alberta's dataset is that it provides aggregate data of planning statistics. This limits the ability of researchers to understand several useful attributes such as:

- Approval/Refusal Rate;
- Average number of units approved per application;
- Break down of approvals or denials by structure size;
- Timelines of approvals by structure size; and
- Location of approvals and refusals.

There are many useful forms of analysis not listed that could be generated by researchers but requires a break down of specific application approvals that includes address, complete application date, status of application, date of decision rendered, number of units included in the proposal, total gross floor space ("GFA") of non-residential portions, etc.

We also recommend that this data be collected on an ongoing basis and only include applications that were submitted at the beginning of the year or where a decision was rendered at the beginning of year be included. Attempting to gather historical data may be overly onerous compared to the benefit generated.

It may also be prudent to limit this level of information requirement to municipalities of a particular size, which would have the capability and capacity to produce such reports. Finally, we also believe that this requirement could also help encourage more municipalities to adopt e-planning platforms, which would help automate much of the required reporting requirements.

Eleven (11) of the sixteen (16) municipalities studied already collect and publish most the necessary status information in their publicly available development trackers to produce the suggested PIR requirements.

One piece of feedback that municipalities provided was that many development applications are delayed because of the lengthy and inconsistent timelines for provincial ministries or agencies on providing commentary that was requested. Without any source of data, such as meeting minutes or a PIR like file, it is not possible to track the extent of the problem or to offer analysis on the culpability of provincial actions, or lack thereof, in delaying development application approvals.

6.7 NATIONAL/PROVINICAL ZONING ATLAS

While the availability of GIS data on zoning has improved since the last benchmarking study, there are still inconsistencies among municipalities in providing this information to the public. Only seven (7) of the cities in this study provide this data to the public.

In the United States, Cornell University operates the “National Zoning Atlas’, a program to collect zoning by-laws nationally and present key attributes in an online user-friendly map.

The purpose of the program is to help disseminate information on zoning to broaden participation in land use decisions, identify opportunities for zoning reform and narrow the asymmetry of information between participants in land and housing markets. According to the National Zoning Atlas, they provide cross- jurisdictional comparisons, highlight regional and statewide trends, and strengthen national planning for housing production, transportation infrastructure, and climate response.

The State of Victoria also provides a dedicated web portal that unifies and aggregates 15,000 PDF maps of zoning and overlay information into a convent to use interactive map called ‘VicPlan’. The interactive map includes both major cities in metropolitan areas, such as Melbourne, as well as more rural areas of the state.

To better understand the impact of zoning on housing and track national or provincial trends in local decision making, it is recommended that the federal government, provincial governments, and municipalities, with possible coordination by an educational institution, undertake a national zoning atlas program in Canada with sub-provincial organization. The federal government could provide grant money to municipalities to digitize their zoning maps and funding for an education institution to operate the program, while the province could use directives, such as the Ontario Digital Data Directive, to include municipalities and planning datasets that would encourage municipalities’ co-operation in the suggested endeavour.

6.8 NEW APPROACHES TO ALLOCATING AND ACCOUNTING FOR STAFF TIME

The current economic climate in relation to labour shortages and housing costs has also been reported to be affecting planning departments and related provincial ministries across the country.

The Land Matters Advisory Committee in PEI noted in their July 2021 report examining planning in the province that:

> The Committee also heard that the provincial government lacks planning capacity, and planning staff in particular…

> If internal planning staff and capacity is not currently sufficient, then the provincial government should obtain external planning support to complete the work.

The City of Toronto's planning department reported in June 2022 that they had an overall vacancy rate of 12.8%, and roughly one-quarter of their staff had worked there for less than 3 years as of April 2022.

Issues cited in the report as causes of turnover and vacancies include, but not limited to:

- Compensation competitive with the private market;
- Limited flexibility to provide competitive offers, such as only being able to offer temporary employment status instead of permanent, vacation, and benefit entitlement restrictions; and
- Toronto being a comparatively expensive city with regards to cost of living in relation to wages.

When turnover occurs during the development application process, it can lead to significant instability in the communication of expectations leading to delays. The new planner on the file needs time to get up to speed, they may have different interpretations of policies or objectives causing significant re-work of plans, and they may also be bringing their casework from their previous position with them in addition to dealing with the new workload taken up from their departing colleague.

Suggested approaches to resolve these issues could include the following:

- External planning support - many private planners have public community planning experience, and it is common practice in smaller municipalities in Ontario that cannot afford a full staff complement to contract out the development review process. Retaining outside planning consultants for court/tribunal matters or large-scale studies is already common practice, and may need to be considered for day-to-day tasks as well, even if only temporarily and where the lack of conflicts-of-interest allow it;
- Municipalities could enact a method to allow recognition of staff availability when requesting reports or studies. In June 2022 it was reported by Spacing Magazine that the City of Toronto had 393 reports that were overdue.[22] Municipalities should create a public registry of all requests and their statuses with regular updates. Improving public accountability will both ensure that staff are completing the work assigned to them by council and that council is not creating work requests that take resources away from other time-sensitive areas of work.

[22] Dylan Reid. *Sixty-two Pages of Overdue Staff Report*. Spacing, June 2022

- An approach to budgeting and accounting for available staff resources would be to give each councillors an equal yearly pool of hours that they could use to assign staff to undertake studies or prepare reports. This would ensure that there are adequate staff resources to address all of council's requests, and when there are not sufficient resources, there is a mechanism in place to make both council and the public aware of this.

6.9 STREAMLINING AND ELIMINATING TECHNICAL STUDIES FOR AFFORDABLE HOUSING

While many municipalities act to reduce the technical studies required, or may seek to fast-track affordable housing projects, many also treat affordable housing projects no differently than any other type of development. It is not atypical to see a long list of professional and technical studies to secure approvals at the local municipal level, even when the project proponent is the upper-tier municipality responsible for housing services.

Some studies are technical in nature and unavoidable such as engineering studies, however, other kinds of reports, such as 'Market Impact Studies', and potential many other types of requirements would appear to add little value to the consideration of the project, and instead only contribute to slowing the process, review and approval applications to deliver much needed affordable housing.

Many municipalities attempt to incentivize projects to include affordable housing through promising 'fast tracking', such as Toronto's Open-Door Program. An alternative benefit to fast-tracking review of projects that include affordable housing would be to either allow such projects to be waived through the development application process entirely by making these kinds of proposals as-of-right or through reducing the regulatory burden by eliminating or minimizing the requirement to adhere to certain policies or guidelines.

While outside the scope of this study, the cities of Vancouver and Victoria B.C. each to different degrees, approved initiatives to provide as-of-right zoning to qualifying affordable housing projects, and eliminating key steps in the otherwise mandated public process, such as rezoning, urban design guidelines, etc. The estimated savings per project were estimated to be in the range of $400,000 to $2,000,000 per project.

In April 2022, the City of Toronto passed an Official Plan Amendment (OPA) and urban design guidelines for the Danforth Avenue.[23] One of the items within the OPA was to mandate the support of affordable and supportive housing development by allowing site specific modifications without requiring an official plan amendment. Furthermore, the Chief City Planner was tasked

[23] Site and Area Specific Policy 772

with exploring built form strategies to support the inclusion of affordable housing within the policy area.

The examples from Vancouver, Victoria, and Toronto show a growing trend of municipalities, becoming more aware of the adverse impacts a lengthy or unnecessarily burdensome regulatory regime can have, especially with regards to affordable or social housing projects.

7 CONCLUSIONS

Based on a review of municipal planning processes, planning features, government charges, and other research elements of the municipalities studied, there are several overarching findings about how these municipalities compare with one another.

7.1 SUMMARY OF BENCHMARKING RANKINGS

The figure below summarizes the findings and associated rankings of each of the three major elements studied that feed into housing affordability – getting housing approved expediently, ensuring submissions conform to municipal expectations (thereby improving the quality of submissions) and government charges that get borne by buyers/renters, or otherwise may hinder the feasibility of constructing new housing.

The municipality atop the rankings in this study is the City of Barrie, who placed in the top 4 in each of the three categories reviewed (and a weighted average score of 3.1). Nine other municipalities have scores ranging from 6.0 to 9.1, each with a top five ranking in at least one of the three categories.

Figure 7-51 **Combined Ranking - 2022 Municipal Benchmarking Study - Greater Toronto Area**

		Rank by Category			
		Approval Timelines	Government Charges	Planning Features	
Rank	Municipality	*fastest to lowest*	*lowest to highest*	*most to least*	Total Score
1	Barrie	3	4	2	3.1
2	Oakville	5	9	3	6.0
3	Milton	1	7	10	6.1
4	Bradford West Gwillimbury	7	1	13	6.4
5	Oshawa	6	2	14	6.8
6	Brampton	4	10	6	7.0
7	Clarington	8	3	12	7.2
8	Burlington	12	5	7	7.7
9	Whitby	2	6	16	7.8
10	Mississauga	9	13	4	9.1
11	Innisfil	10	8	15	10.7
12	Toronto	15	15	1	10.8
13	Markham	11	14	8	11.3
14	Richmond Hill	14	12	9	11.7
15	Vaughan	13	16	5	11.8
16	Caledon	16	11	11	12.5
Weighting by Category		30%	40%	30%	

Source: Altus Group Economic Consulting

The bottom six all have weighted average scores of 10.7 to 12.5, and each have a ranking in at least one category that is in the bottom three (14th through 16th).

7.2 FINDINGS, IMPLICATIONS AND RECOMMENDATIONS

Based on our research, we are able to make the following conclusions, as well as identify potential implications for the delivery of housing.

7.2.1 Affordability Concerns are Driving Regional Demographic Shifts

- Population growth in the GTA seen in the 2016-2021 period has been slowing compared to prior 5-year periods. Net outflows from more expensive areas to less expensive parts of the region (or outside of the region altogether) have increased significantly;
- Many municipalities are seeing significant population declines in existing neighbourhoods, which puts significant additional emphasis on growth in 'designated' growth areas to not just drive population growth in a municipality but also to offset population declines in 'stable' neighbourhoods;
- Both the outflows of people to outlying areas of the region and declines in population in existing communities are largely from people aged 25-44 and persons under aged 19 migrating out of the least affordable areas, such as the City of Toronto, Peel Region and York Region.
- The proportion of housing being constructed has increasingly become oriented towards apartments, and the orientation of planning legislation is likely to see the proportion of apartments continue to increase.

7.2.2 Municipal Processes and Requirements Contributing to Long Approval Timelines – May be Indicative of Broader Issue with Legislative Framework in Ontario

- Many municipalities have adopted a high percentage of identified tools and processes that are thought to help make the application process easier and more transparent for applicants, but some municipalities do still not make things such as application requirements, technical study terms of reference, or key planning documents available to applicants, which can hinder the quality of submissions received, and can indirectly impact municipal review timelines.
- Many applications are required to submit a wide array of technical studies, and while many are certainly necessary, our analysis has found 42 different types of studies are possible. With even 10-20 being required increases the amount of time to get to a complete application, and adds complexity to municipalities reviewing the full submissions, which also strains the resources of private-sector planning firms (among other related technical experts) as well.
- Municipal approval timelines in the GTA are among the worst of major municipalities across Canada and have deteriorated compared to the findings in our 2020 Study, with average timelines 27% to 51% longer.

- Approval timelines range from 10 to 34 months depending on the municipality, with most types of applications (Rezonings, Site Plan, Plan of Subdivision, etc) taking 20-24 months on average GTA-wide. Based on similar research undertaken for CHBA, average approval timelines in the GTA are higher than any other part of Canada.
- While some municipalities are performing well and have improved, a worsening of approval timelines is still seen in most municipalities studied, only three (3) of the municipalities examined saw improvement. Given Ontario's municipal performance relative to other jurisdictions across Canada, the system that municipalities are working within appears to be the main constraint and may require a thorough review to assess the choke points and processes constraining municipal staff.
- The lack of usage of development permit systems, which are permitted by the *Planning Act,* would appear to be one significant difference in approach in Ontario compared to the rest of Canada. Similarly, a relative lack of delegated authority is also evident when comparing Ontario to other jurisdictions outside of the province.

7.2.3 Little Time Savings Evident for Smaller Applications Puts Ability of Zoning Reform Initiatives to Deliver Needed Housing Supply at Risk

- There are little differences in approval timelines for smaller applications compared to larger applications – the marginal amount of 'staff days per unit approved' is 5-10-times higher for smaller applications (3-50 units) than for larger applications.
- Relying on smaller applications, through initiatives such as those to upzone stable neighbourhoods to address the significant need for more housing in the region, will have severe implications for the staffing resources needed to review a large 'caseload' without the associated large unit count coming from that review. Zoning reform to allow more fine-grained development in neighbourhoods will need to be matched with significantly streamlined processes for those applications.
- Otherwise, relying on increased staffing levels alone may not be sufficient. Since 2020, municipal staffing in planning departments has increased marginally over the past two years, although some municipalities are reporting high levels of vacant positions, with cost of living, compensation, and intensity of the work environment cited as reasons why positions are hard to fill.
- While changes may be necessary to ensure staff time is freed-up from a potential influx of smaller applications, recent changes to clawback planning application fees if statutory timelines are not met will negatively impact the ability of municipalities to properly fund and resource planning departments and other related departments. Currently, only a tiny fraction of applications are approved anywhere close to statutory maximums,

suggesting that the clawbacks will have drastic impacts on a key funding source for municipal planning departments.

7.2.4 Municipal Charges Disproportionately Imposed on High-Density Developments Also Puts Objectives to Increase Infill and Intensification at Risk

- Municipal charges in the GTA continue to escalate significantly, increasing on average by 30-36% since the 2020 Study.
- Most charges – development charges, parkland dedication requirements, community benefits charges, and inclusionary zoning are significantly higher for high-density housing compared to low-rise proposals. Many charges directly stem from underlying land values (Parkland dedication charges, Community Benefit Charges), while others heavily incorporate land values (development charges) into their calculation, which results in higher municipal charges in more urbanized environments.
- Municipal charges for low-rise housing amount to $53 per square foot, while charges for high-rise housing amount to $99 per square foot – municipal charges are roughly 2-times higher for high-density housing. This is before accounting for the costs associated with inclusionary zoning that is currently applied to high-density housing only.
- The influence of land values (both directly and indirectly) on municipal charges causes many of these charges to be the highest in more urbanized municipalities, and higher for high-density development. The seven highest municipal charges are found in the City of Toronto, the three York Region municipalities (Vaughan, Richmond Hill and Markham) and the three Peel Region municipalities (Mississauga, Brampton and Caledon). Relatedly, these are the areas where net outflow of persons to other parts of the GTA or outside of the GTA are the highest.
- Higher municipal charges (like escalating construction costs or other costs) increase the price ‘floor’ that units need to be sold at to be feasible to the developing landowner and home builder. If fewer units can sell at prices that cover increased costs, fewer units will get built.
- The disproportionate costs per square foot in municipal charges towards high density puts at risk municipal objectives for increased infill and intensification. This could hinder utilization of public infrastructure investments in urbanized areas, such as major transit station areas, or transit corridors. As many municipalities in the GTA are largely built-out, higher costs for the high-density development will be counterproductive in trying to slow or stop the outflow of persons outside the region.

Appendix A
Detailed Information: Planning Features

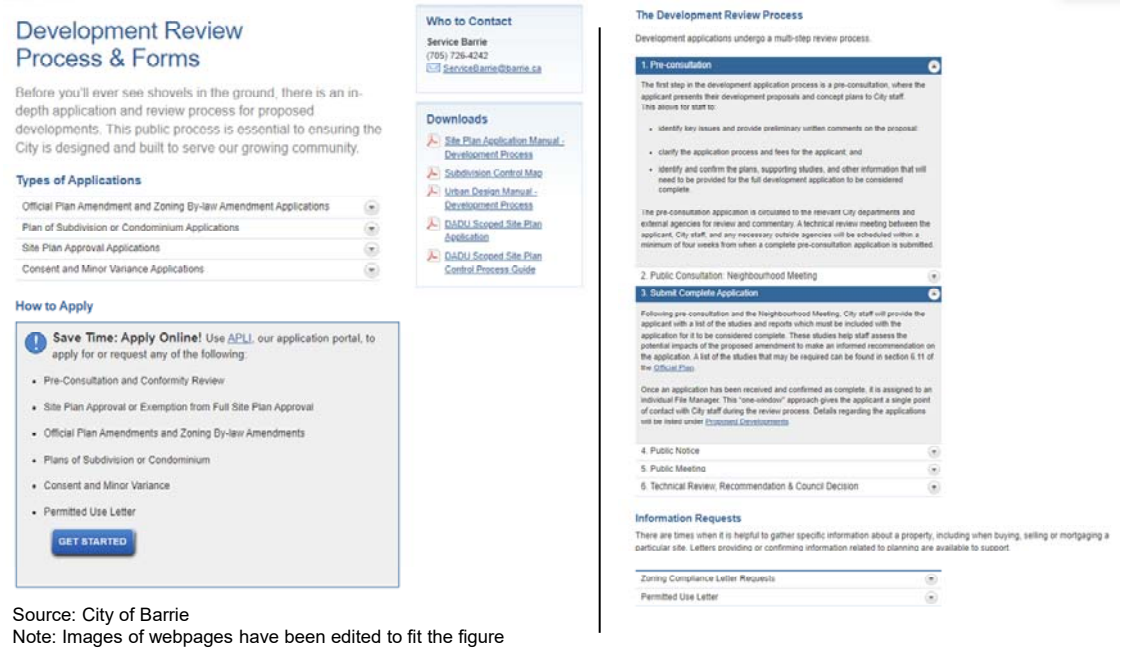
Additional Details re: Scoring

Case Studies – Development Guidance

Figure A-1 shows the City of Barrie's development guide broken up in two parts on the left and right-hand side to show the complete webpage. The guide consists of several sections with items that can be expanded by clicking on a button that provides additional text and hyperlinks.

Figure A-1

Development Application Guide, City of Barrie

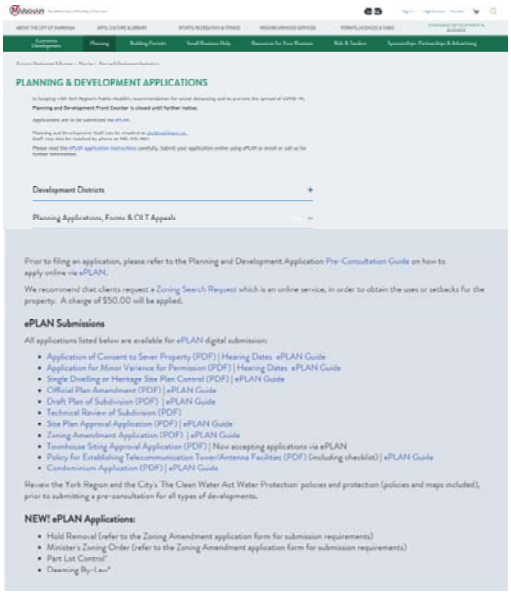


Source: City of Barrie
Note: Images of webpages have been edited to fit the figure

Figure A-2 below shows the City of Markham's development guide broken up in two parts on the left and right-hand side to show the complete webpage for major application types. Note, the portion covering minor variances and consents is excluded. The Development guide includes hyperlinks to application forms and guides on how to use their e-plan submission portal.

Figure A-2

Development Application Guide, City of Markham



PLANNING & DEVELOPMENT APPLICATIONS

Development Districts

Planning Applications, Forms & OLT Appeals

Prior to filing an application, please refer to the Planning and Development Application Pre-Consultation Guide on how to apply online via ePLAN.

We recommend that clients request a Zoning Search Request which is an online service, in order to obtain the uses or setbacks for the property. A charge of $50.00 will be applied.

ePLAN Submissions

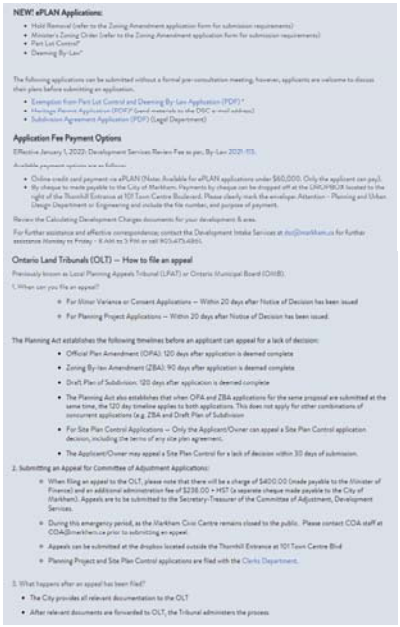
All applications listed below are available for ePLAN digital submission:

- Application of Consent to Sever Property (PDF) | Hearing Dates ePLAN Guide
- Application for Minor Variance for Permission (PDF) | Hearing Dates ePLAN Guide
- Single Dwelling or Heritage Site Plan Control (PDF) | ePLAN Guide
- Official Plan Amendment (PDF) | ePLAN Guide
- Draft Plan of Subdivision (PDF) | ePLAN Guide
- Technical Review of Subdivision (PDF)
- Site Plan Approval Application (PDF) | ePLAN Guide
- Zoning Amendment Application (PDF) | ePLAN Guide
- Townhouse Siting Approval Application (PDF) | Now accepting applications via ePLAN
- Policy for Establishing Telecommunication Tower/Antenna Facilities (PDF) (including checklist) | ePLAN Guide
- Condominium Application (PDF) | ePLAN Guide

Review the York Region and the City's 'The Clean Water Act Water Protection' policies and protection (policies and maps included), prior to submitting a pre-consultation for all types of developments.

NEW! ePLAN Applications:

- Hold Removal (refer to the Zoning Amendment application form for submission requirements)
- Minister's Zoning Order (refer to the Zoning Amendment application form for submission requirements)
- Part Lot Control*
- Deeming By-Law*



NEW! ePLAN Applications:

- Hold Removal (refer to the Zoning Amendment application form for submission requirements)
- Minister's Zoning Order (refer to the Zoning Amendment application form for submission requirements)
- Part Lot Control*
- Deeming By-Law*

The following applications can be submitted without a formal pre-consultation meeting, however, applicants are welcome to discuss their plans before submitting an application.

- Exemption from Part Lot Control and Deeming By-Law Application (PDF)*
- Heritage Permit Application (PDF)* (send materials to the DSC e-mail address)
- Subdivision Agreement Application (PDF) (Legal Department)

Application Fee Payment Options

Effective January 1, 2022: Development Services Review Fee as per, By-Law 2021-113.

Available payment options are as follows:

- Online credit card payment via ePLAN (Note: Available for ePLAN applications under $60,000. Only the applicant can pay).
- By cheque to made payable to the City of Markham. Payments by cheque can be dropped off at the UNionRUN located to the right of the Thornhill Entrance at 101 Town Centre Boulevard. Please clearly mark the envelope: Attention – Planning and Urban Design Department or Engineering and include the file number, and purpose of payment.

Review the Calculating Development Charges documents for your development & area.

For further assistance and effective correspondence, contact the Development Intake Services at dsc@markham.ca for further assistance Monday or Friday – 8 AM to 3 PM or call 905-475-4861.

Ontario Land Tribunals (OLT) – How to file an appeal

Previously known as Local Planning Appeals Tribunal (LPAT) or Ontario Municipal Board (OMB).

1. When can you file an appeal?

- For Minor Variance or Consent Applications – Within 20 days after Notice of Decision has been issued
- For Planning Project Applications – Within 20 days after Notice of Decision has been issued.

The Planning Act establishes the following timelines before an applicant can appeal for a lack of decision:

- Official Plan Amendment (OPA): 120 days after application is deemed complete
- Zoning By-law Amendment (ZBA): 90 days after application is deemed complete
- Draft Plan of Subdivision: 120 days after application is deemed complete
- The Planning Act also establishes that when OPA and ZBA applications for the same proposal are submitted at the same time, the 120 day timeline applies to both applications. This does not apply for other combinations of concurrent applications (e.g. ZBA and Draft Plan of Subdivision
- For Site Plan Control Applications – Only the Applicant/Owner can appeal a Site Plan Control application decision, including the terms of any site plan agreement.
- The Applicant/Owner may appeal a Site Plan Control for a lack of decision within 30 days of submission.

2. Submitting an Appeal for Committee of Adjustment Applications:

- When filing an appeal to the OLT, please note that there will be a charge of $400.00 (made payable to the Minister of Finance) and an additional administration fee of $238.00 + HST (a separate cheque made payable to the City of Markham). Appeals are to be submitted to the Secretary-Treasurer of the Committee of Adjustment, Development Services.
- During this emergency period, as the Markham Civic Centre remains closed to the public. Please contact COA staff at COA@markham.ca prior to submitting an appeal.
- Appeals can be submitted at the dropbox located outside the Thornhill Entrance at 101 Town Centre Blvd
- Planning Project and Site Plan Control applications are filed with the Clerks Department.

3. What happens after an appeal has been filed?

- The City provides all relevant documentation to the OLT
- After relevant documents are forwarded to OLT, the Tribunal administers the process

Source: City of Barrie
Note: Images of webpages have been edited to fit the figure

The City of Barrie's guide includes information about the types of applications, how to submit an application online, the development review process, terms of references for required studies, application forms, and more.

The City of Markham's website provides information about the mechanical process for applying, as well as links to various application forms that include check lists of drawings and authorizations forms to be included in the application package, and an explanation about appeals.

Markham's guide is missing explanations of application descriptions (e.g. what is an Official Plan Amendment), the application process after a complete application has been submitted, process steps, a fulsome terms of reference, the difference between a major or minor application (they include checklists for this but not explanations), and more.

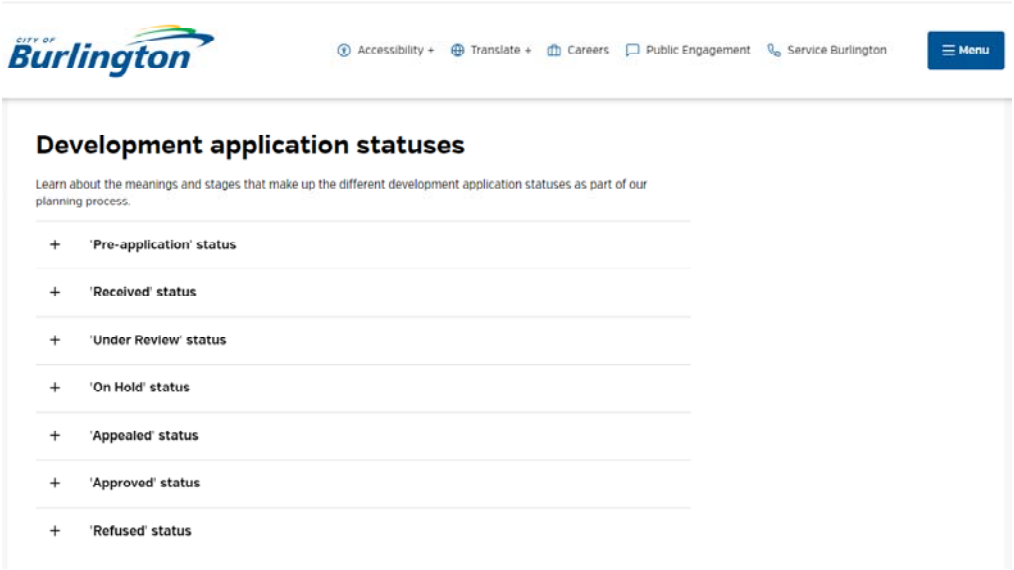
Despite Markham having a website that has a more modern interface, its development guide is missing key pieces of information. As a result, City of Barrie was given full marks for this feature, whereas City of Markham did not receive full marks.

Case Studies – Application Tracker

Figure A-3 below is an excerpt taken from City of Burlington's development guide section on the planning process providing information on the seven (7) statuses or stages an application can progress through.

Figure A-3

Application Stages, City of Burlington



Source: City of Burlington

The statuses are also used as part of Burlington's development application tracker system and included the following additional information on the meaning of each stage not visible in the figure above.

Pre-Application status:

- Completed application not yet received
- Application not yet deemed complete
- Pre-application community meeting

'Received' status:

- New application
- Public notification
- Neighbourhood meeting

'Under Review' status:

- Technical circulation
- Statutory public meeting & Recommendation Report #1
- Under review
- Recommendation Report #2 (if needed)
- Council Meeting

'On Hold' status:

- Waiting for additional materials

'Appealed' status:

- Ontario Land Tribunal appeal

'Approved' status:

- Application(s) have been approved by City Council or the Ontario Land Tribunal.

'Refused' status:

- Application(s) have been refused by City Council or the Ontario Land Tribunal.

Generally, most municipalities that provide application progression updates follow a similar, although not always exact, convention as Burlington. For a provincial PIR system to be implemented, the province, working with municipalities, is going to have to establish a common convention for application stages for an 'apples-to-apples' comparisons of application data to be possible. While the issue is being highlighted in this report, it is beyond the scope of this study to determine exactly what conventions should be used or how they should be structured. This is a topic that we hope provincial policy analysts will seek to expanded upon in future deliberations.

Case Studies – E-Submission Capabilities

The highest-tier group municipalities in this theme (Barrie, Markham, and Oakville), all provide advanced capabilities to both submit planning applications and building permits through online portals, as well, make payments online for both types of submissions.

While we do not have any specific recommendations of vendors that should be adopted, municipalities that are seeking to expand their e-submission capabilities should investigate how the integration of the of these systems was conducted by top-tier municipalities. This would provide knowledge on best practices in several areas of inquiry, such as change management, issues or the interoperable capabilities that e-planning and e-permitting provide with other systems, such as development trackers or online payment managers.

At a minimum, municipalities should work with their regional upper-tier and fellow lower-tier municipalities and agencies, like conservation authorities, to ensure that the systems they adopt have the capability to connect to a data exchange between each other.

SCORECARD CRITERIA AND INDIVIDUAL SCORES

(1) Development Guidance

- Development Guides:
- Scoring based on the following 20 parameters:
    1) Explains the application process steps;

2) Lists the various application types and describes them;
3) How major or minor application determination is made (if applicable);
4) Provides basic explanations of land use terminology or legal concepts;
5) Informs of you of deadlines (if applicable);
6) Provides guidance on expected application timelines for a decision;
7) Tells you how much an application cost;
8) Explains how you can pay for an application;
9) Tells where you submit an application;
10) Available methods to to submit an application (in-person, mail, email, portal, etc);
11) What drawings, authorization forms, or declarations, to include with an application;
12) How many copies of documents you need for a submission (if applicable);
13) The address or e-mail address you need to send a submission to (if applicable);
14) User guide to e-plan or e-permit portal system (if applicable);
15) Provides blank copies of application forms;
16) What potential charges or fees may apply (e.g. development charges, parkland fees, etc);
17) What formats you can submit documents or are required to – USB, CD, paper, etc.;
18) What the file format naming convention is required for electronic submissions (if applicable);
19) What file types to include for documents (if applicable); and
20) If appeals can be made to decisions and how appeals work (if applicable).

- Marking:
    - **No marks (0/2)** are awarded if there is no development guidance at all;
    - **Half Marks (1/2)** are awarded if less than 80% of the parameters can be accounted for; and
    - **Full Marks (2/2)** are award if at least 80% or more of parameters can be accounted for.
- <u>Application Supporting Materials</u>

- **No Marks (0/2)** are awarded if there is no supporting materials;
- **Half Marks (1/2)** are awarded if there is some supporting materials but there is no complete list of required documents. For example urban design guidelines are made available or explanations of engineering drawing requirements, etc;
- **Bonus Marks (1.5/2)** are awarded if there is at least a list of all study requirements; and
- **Full Marks (2/2)** are awarded if a full list of study document requirements is provided with explanations of most listed items.

- Note: Despite the Planning Act requirement to have all required studies listed in official plans for municipalities in Ontario, the municipalities studied only received marks for what was available on their webpages. Many applicants are not familiar with this policy and scoring municipalities on this basis would not accurately capture the review of their development guidance.

(2) Development Application Tracking

- Active Applications
  - **No Marks (0/2)** are awarded if no active development application information is displayed anywhere. This includes open data portals.
  - **Full Marks (2/2)** are awarded for displaying active applications of major applications.
- Status Indicator
  - **No Marks (0/2)** are awarded if there is no status information for active applications.
  - **Half Marks (1/2)** are award if some status information is provided (e.g. if public notices have been issued or a council decision has been issued.
  - **Full Marks (2/2)** are awarded for full status information on applications.
- Historical Development Data
  - **No Marks (0/2)** are awarded if there is no historical application data.
  - **Half Marks (1/2)** are awarded if there is historical data but only with very limited information. For example, data does not go back beyond a year or the data that is present is only high-level information like application number and address.
  - **Full Marks (2/2)** are provided for historical data that goes back beyond a year and provides several data points, e.g. description,

application number, address, number of units, polygon of development site on a map, etc.

- Map of Development Applications
    - **No Marks (0/2)** are awarded if there is no map of development applications, or the only geographical information available is pins on google maps of individual applications as it defeats the purpose of being able to see at a glance where development is happening.
    - **Half Marks (1/2)** are awarded if the map of development applications is a static PDF file. This system depends on planning staff to regularly update both the data, create a map, and post it to the municipality's website;
    - **Full Marks (2/2)** are awarded if there is an interactive geographic information system ("GIS") map of active and/or historical information. No marks are deducted if only active information is displayed, or the mapping is part of an open data portal that produces maps with various datasets, including active applications that is regularly updated.
- Supporting Files
    - **No Marks (0/2)** are awarded if there is no supporting file information available.
    - **Half Marks (1/2)** are awarded if only drawings and staff report information is available or additional reports and documents are available by request only.
    - **Full Marks (2/2)** are awarded if most documents associated with an active application are publicly available online.

(3) Electronic Submission and Payment Capabilities

- Ability to Submit Planning Applications Electronically
    - **No Marks (0/2)** are awarded if there was no way to transmit documentation through the internet. Applications that had to be submitted through a digital format, such as CD or USB, but physically mailed in, were included in this marking scheme.
    - **Half Marks (1/2)** are awarded if application documents could be sent by email or by a digital drop box created by the applicant.
    - **Bonus Marks (1.5/2)** are awarded if a municipality had an e-planning portal but this system only covered a limited number of application types (e.g. only subdivision or site plans but not official plan amendments or zoning bylaw amendments)

  - **Full Marks (2/2)** are awarded if a municipality had a dedicated planning portal for most or all application types or a municipally-operated digital drop box service for all application types.

- Ability to Pay Planning Applications
  - **No Marks (0/2)** are awarded if it wasn't possible to pay fees other than through cheque.
  - **Partial Marks (0.5/2)** are awarded if there were additional methods of payment other than cheque but not online (e.g. credit card payment at a service desk)
  - **Half Marks (1/2)** are awarded if payment could be made over the phone or by email through wire transfer.
  - **Bonus Marks (1.5/2)** are awarded if the fee for some applications can be paid online or if there is a limit on how large a fee can be paid (e.g. $10,000 cap)
  - **Full Marks (2/2)** are awarded if you can fully pay all fees online without a limit.
- Ability to Submit Building Permits Electronically
  - **No Marks (0/2)** are awarded if there was no way to transmit documentation through the internet. Applications that had to be submitted through a digital format, such as CD or USB, but physically mailed in were included in this marking scheme.
  - **Half Marks (1/2)** are awarded if application documents could be sent by email or by a digital drop box created by the applicant.
  - **Bonus Marks (1.5/2)** are awarded if a municipality had an e-permit portal but this system only covered a limited number of application types (e.g. there was a portal for only single family dwelling building permits).
  - **Full Marks** are awarded if a municipality had a dedicated building permit portal an applicant could use or a municipally-administered digital drop box service for all permit types.
- Ability to Pay Building Permits
  - **No Marks (0/2)** are awarded if it wasn't possible to pay fees by no other method other than through cheque.
  - **Partial Marks (0.5/2)** are awarded if there were additional methods of payment other than cheque but none of these included online payments (e.g. credit card payment at a service desk).
  - **Half Marks (1/2)** are awarded if payment could be made over the phone or by email through wire transfer.

- **Bonus Marks (1.5/2)** are awarded if some application fees can be paid for online or if there is a limit on how large a fee can be paid (e.g. $10,000 limit)
- **Full Marks (2/2)** are awarded if you can fully pay all fees online without limit.

(4) Availability of Key Planning Documents

- Dedicated Interactive Zoning Map
  - **No Marks (0/2)** are awarded if it is not possible to instantly get property zoning information online. Online requests that take several business days or that cost money fall into this marking scheme.
  - **Half Marks (1/2)** are awarded if it is possible to get property zoning information instantly, but it is in a static format such as a schedule in a PDF file or as part of a written property record.
  - **Full Marks (2/2)** are awarded if there is a dedicated online zoning map using GIS data with polygons that provide zoning boundaries and information in an interactive manner.
- Availability of GIS Zoning Open Data
  - **No Marks (0/2)** are awarded if it is not possible to download zoning information in an open data format, such as Shapefile, GEOJson, CSV, etc.
  - **Full Marks (2/2)** are award if it is possible to download zoning information in an open data format, such as Shapefile, GEOJson, CSV, etc.

(5) Accountability

- Availability of Municipal Staff Phone Number and Emails
  - **No Marks (0/2)** are awarded if the only way to contact the planning or building department is through a service hub email or phone number (e.g. 311).
  - **Half Marks (1/2)** are awarded if there is a dedicated email or phone number to contact the planning or building department but not for individual personnel or business units.
  - **Bonus Marks (1.5/2)** are awarded if there is a dedicated email or phone number to contact individual business units or you can contact staff but by only email or phone numbers, and not both.
  - **Full Marks (2/2)** are awarded if you can contact individual staff members in the planning or building department by both email or phone (i.e. both pieces of contact information are provided).
- Availability Meeting Minutes, Agenda and Items

- **No Marks (0/2)** are awarded if the municipality does not provide any minutes, agendas, or items (e.g. staff reports).
- **Half Marks (1/2)** are awarded if minutes and agendas are provided but items are not made available.
- **Full Marks (2/2)** are awarded if meeting minutes, agendas, and items are all available.