



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH9.2 Development Review Timeline Metrics - First Quarter of 2024 and PH9.3 Concept 2 Keys Priority Development Review Stream Dashboard: January 2024 Update

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Position

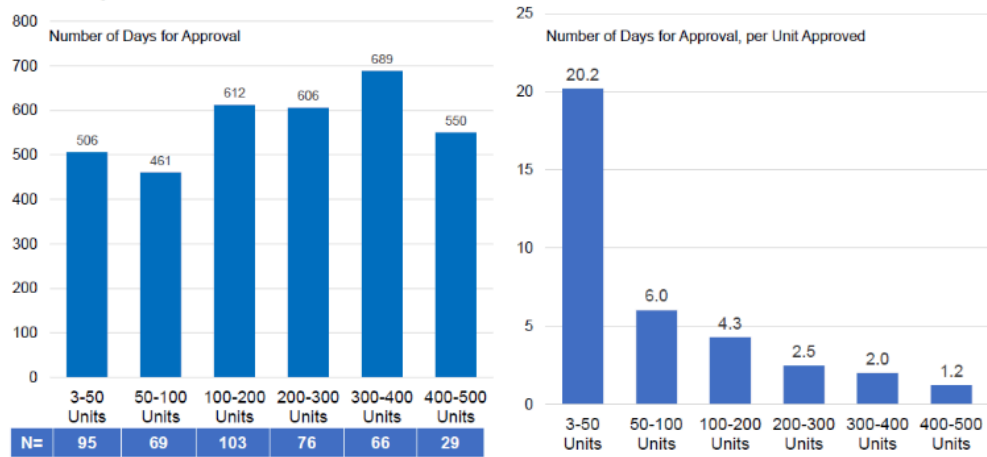
More Neighbours Toronto supports PH9.2 to incorporate development timelines into a publicly available dashboard and PH9.3 to provide information on the Concept to Keys Priority Development Review Stream. Toronto's development timelines are amongst the longest in Ontario, which itself has long timelines compared to other provinces and countries. Making data publicly available and easy to access is an important step in addressing this issue. It will help to identify problem areas and increase accountability.

We particularly appreciate the inclusion of the pre-application information in the dashboards. The City has proposed to address Bill 109 partly by shifting some work to the pre-application process and it will be important not to point to any resulting decrease in times from application submission to approval as an improvement without consideration of this. The data already suggest some increase in pre-application times in recent months. Monitoring changes in pre-application times will help the City work toward improvements in overall timelines, including pre-application.

It would also be useful to include information on the number of units (and, if possible, net new units) in addition to the number of applications. The number of units approved in a particular time will give an idea of the complexity of applications that City Planning is dealing with and the number of homes that are making it through the approval pipeline. This will be useful data for both the provincial Build Faster Fund and federal Housing Accelerator Fund, particularly if interest rates and construction costs continue to hinder construction.

For PH9.2, making a breakdown of approval times binned by the number of units (similar to the Figure below) will indicate whether approval times remain a likely barrier to the financial feasibility of mid-rise housing where it is not allowed as-of-right.

Figure ES- 2 **Average Timelines for Approvals, High-Density Development Projects, Ontario Municipalities**



Source: Altus Group Economic Consulting

An example of approval time separated out by the proposed number of units in an application. From [Altus Group, Municipal Benchmarking Report](#).

In addition, **the total time from initial submission to Notice of Approval Conditions would be a useful metric.**

More Neighbours Toronto remains disappointed with the growing delays in approval times despite the growing need for and increasing costs of housing. These delays also affect the City’s own affordable housing projects and those accepted for Open Door funding. However, we were heartened by recent improvements in timelines at the Committee of Adjustment following a focused review and feel that a similar change is possible for zoning and site plan approvals. Making data available for scrutiny is a key part of this process.

Regards,
 Colleen Bailey,
 More Neighbours Toronto