

## **Development Application Fee Review**

Date: April 24, 2025

To: Planning and Housing Committee

From: Deputy City Manager, Development and Growth Services

Wards: All

### **SUMMARY**

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Through the processing of development applications, the City's development review service shapes how the city grows and delivers services necessary to successfully promote and manage growth. This service is critical in maintaining Toronto's position as a world-class city by supporting the delivery of new housing supply; transit projects; healthcare facilities; innovation, manufacturing and industrial facilities; landmark projects; and critical infrastructure that support our social and economic prosperity, growth and cohesion.

The City of Toronto's development review service continues to navigate significant legislative change as well as market and geopolitical uncertainty. To address resultant changes in development and application processing trends, the City is focused on transforming its organizational structure and processes, with the goal of expediting the review of all development projects, especially those that deliver new affordable and purpose-built rental homes and support economic growth and job creation.

Municipal Code Chapter 441, Fees and Charges, Appendix C, Schedule 13 sets out the City's fees for processing development applications. Fees are intended to recover the cost of services provided by all divisions engaged in the development review process. The current development application fee schedule came into effect on September 1, 2022.

As directed by Council and in accordance with the City's User Fee Policy, City staff (together with consultants KPMG and Watson & Associates Economists) undertook the 2024 Development Application Fee Review (the 2024 Review). Detailed findings of this review are provided as Attachments 2 -10. Subject to Council approval, the recommended fee schedule included in Attachment 1 to this report will come into effect on July 1, 2025.

The recommended fee schedule enables full cost recovery for the processing of development applications, except for Site Plan Control, Minor Variance, and Consent applications, which account for approximately 60 percent of the estimated cost increase. Additionally, it streamlines and simplifies development application fees, reduces cost for many major application types, and makes fees more predictable. For applicants, this

means that some fees will decrease, some will not change, and some will increase. Specifically, new proposed fee structures will, among other things:

- Simplify the calculation method for Official Plan Amendment/Zoning By-law Amendment, Zoning By-law Amendment, and Site Plan Control applications by introducing a single, uniform multiplier that applies to both residential and non-residential gross floor area;
- Reduce Zoning By-law Amendment application fees for most scales of mixed-use development and set a maximum cap of \$715,000 (\$743,600 including the 2025 Cost of Living Adjustment) for all Zoning By-law Amendment applications;
- Support housing development by reducing combined Official Plan Amendment/Zoning By-law Amendment application fees for most scales of mixed-use development and setting a maximum cap of \$800,000 (\$832,000 including the 2025 Cost of Living Adjustment) for all combined Official Plan Amendment/Zoning By-law Amendment applications;
- Support all scales of housing development with the City shouldering the majority of the cost increase for Site Plan Control applications while the Site Plan process is re-engineered in 2025 (i.e., staff recommend only 25% of the estimated cost increase be passed on to applicants); and
- Implement a new Plan of Condominium process and application fees which remove an estimated \$800,000 of annual processing costs associated with application circulation and review, with savings to be passed on to applicants.

In addition to the above, the City of Toronto is committed to continuous improvement and has already seen significant improvement in the development review process as a result of ongoing organizational and process improvements. Notably, for all major development application types (including combined Official Plan Amendment/Zoning By-law Amendment, Zoning By-law Amendment and Site Plan Control applications), review times have improved by over 80 percent when compared to the previous 5-year average.

Over the course of 2025 and as outlined in this report, the Development Review Division, working with internal and external partners, will continue to focus on systemic improvements to the development review process. This includes:

- Developing standard operating procedures (SOPs) and clearly identifying application requirements for each application type to enhance predictability, reduce cost for applicants and improve efficiency in the process leveraging a Lean Six Sigma methodology;
- Providing staff with training and tools (including a library of standardized comments) to ensure more consistent and timely interpretation and application of regulatory frameworks;
- Developing new service standards to provide predictability and improve service delivery for all stakeholders in the development review process;
- Improving communication between the City and all parties involved in the development review process through both digital and analog methods;
- Developing consistent streaming and prioritization criteria to expedite applications that propose significant new affordable and purpose-built rental

housing and support economic growth and job creation such as new industrial and manufacturing facilities;

- Introducing new technology tools and enhancing existing tools to support improved workflows, efficiencies and performance tracking between City staff and applicants;
- Establishing Key Performance Indicators (KPIs) to measure performance and publicly track and report on performance; and
- Improving complement management to ensure a dynamic allocation of staff resources across community planning districts to address fluctuations in application volumes as they arise.

In tandem with these tangible actions to streamline processes and expedite development approvals, the City of Toronto continues to make significant financial investments to stimulate housing development. This includes City Council's approval of the Rental Housing Supply Program and its various streams which provide:

- Capital funding and an exemption from development charges, parkland dedication fees, community benefits charges and the waiver of planning application and building permit fees for eligible affordable rental projects;
- Deferral of development charges payable for up to 5,600 purpose-built rental units for as long as they remain rental;
- Implementation of a new Multi-Residential Property Tax subclass which provides a 15% property tax reduction for new purpose-built rental developments for a 35-year period; and
- Deferral of development charges for eligible multi-unit ownership/condominium projects with a minimum of 5% units as affordable rental or ownership (interest free and at June 2024 rates for four years).

As the City advances policy and program initiatives to address the housing crisis, including new or expanded incentive programs, findings from the 2024 Review illustrate a need to further investigate and evolve how the City funds the development review service in ways that recognize and balance the inherent tension between the provision of a critical public service and provision of service for a fee.

Following implementation of the recommended fee schedule, staff recommend returning to a four-year cycle for the next comprehensive review, as supported by the City's User Fee Policy.

## **RECOMMENDATIONS**

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The Deputy City Manager, Development and Growth Services recommends that:

1. City Council amend the City of Toronto Municipal Code, Chapter 441, Fees and Charges, Appendix C - Schedule 13, effective July 1, 2025, substantially in accordance with the revised fee schedule as found in Attachment 1 to this report.

2. City Council request the Chief Planner and Executive Director, City Planning, in consultation with the Executive Director, Development Review Division, to include any recommendations related to Minor Variance and Consent application fees, in accordance with the approach identified in the 2024 Operating Budget for City Planning, in a report on the Committee of Adjustment Service Delivery Model Review in Q3 2025.
3. City Council request the Executive Director, Development Review Division, to undertake a comprehensive review of the Site Plan Control application review process and report back to Council by Q3 2026 with an updated service standard and fee schedule for Site Plan Control applications.
4. City Council authorize the Executive Director, Development Review Division, to implement an Application Fee Policy, effective July 1, 2025, substantially in accordance with Attachment 10 to this report.
5. City Council authorize the City Solicitor to introduce the necessary Bills to give effect to City Council's decision.
6. City Council authorize the City Solicitor to make such stylistic and technical changes to the amendment to the City of Toronto Municipal Code as may be required.
7. City Council authorize the Deputy City Manager, Development and Growth Services to take all necessary actions to implement Council's decision.
8. City Council direct the Deputy City Manager, Development and Growth Services to undertake a comprehensive development application fee review and report back to Council on a regular four-year cycle, in accordance with the City's User Fee Policy.

## **FINANCIAL IMPACT**

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### **Overview: Development Application Volume and Fees**

#### *Development Application Volume*

The City's development review service processes an average of 460 applications per year (calculated over five years, including 2017-2020 and 2023 data). In the first quarter of 2025 (January to March), a total of 113 applications were submitted to the City. This volume aligns with the average annual volume estimate used in the City's cost model and represents a 66 percent increase in application volume over the same period last year.

#### *Development Application Fees*

In aggregate, the 2024 Review found the City's average annual processing cost of development applications (excluding Committee of Adjustment applications) is

approximately \$80.1 million based on the 2024 cost of development review services<sup>1</sup>, as illustrated in Table 3. This represents an increase in processing cost of approximately \$12.9 million (or 19 percent)<sup>2</sup> since the 2021 Review. Currently, the City's fee schedule generates average annual revenues of approximately \$62.8 million, which means it recovers approximately 78 percent of processing costs. This leaves an estimated gap in average annual revenue of approximately \$17.3 million for 2024 (see Attachment 5). It should be noted that the actual gap is determined and reconciled annually based on actual application volumes and corresponding actual fee revenues.

The recommended fee schedule (see Attachment 1) is designed to "close the gap" and achieve full cost recovery for the processing of development applications, with the exception of Site Plan Control, Minor Variance, and Consent applications (addressed separately, below), based on the 2024 cost of development review services. Note that Attachment 1 includes application fee values that reflect the findings of the 2024 Fee Review, cost adjusted to 2025 dollars (i.e., a 4 percent cost of living adjustment has been applied).

The City divisions that participate in the development review process receive a revenue allocation, based on their level of effort, that represents cost recovery (detailed in Table 3). While corporate and divisional organizational structures have changed since 2022, the 2024 Review reflects a status quo organizational structure to ensure alignment with the 2025 Operating Budget. Organizational structure change and any impacts will be reflected through the City's 2026 Budget process. Through the 2026 Budget process, adjustments to revenues and costs will also be made to account for Council-approved initiatives that impact full cost recovery, including expanded incentive and waiver programs to support affordable housing development (e.g., Rental Housing Supply Program).

If approved, the new fee schedule will be effective July 1, 2025. The impact of the new fee schedule is described above in aggregate terms; however, under the *Planning Act*, the processing costs for each application type must be addressed individually. Changes to fees, based on the current cost to deliver the service, may vary depending on the type, size and complexity of an application. This means that some fees will decrease, some will not change, and some will increase.

Fees categorized as "full cost recovery" under the City's User Fee Policy will automatically be adjusted for inflation on January 1 of each year.

### **Site Plan Control Application Fees**

As a result of the 2021 Review, Council approved a 24 percent reduction in Site Plan Control application fees. The 2024 Review showed that the City's current fee schedule recovers approximately 51 percent of the full cost of Site Plan application processing.

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<sup>1</sup> 2024 costing is based on 2024 estimated salary, wage and benefit costs, overtime costs, and other 2024 direct costs. A full breakdown of direct, indirect and capital cost inputs is provided in Parts 1 and 2 of this report.

<sup>2</sup> Total annual application volumes decreased by approximately 7% between the 2021 and 2024 Reviews.

Since 2022, legislative change and an increase in staff level of effort to process Site Plan applications contribute to an average annual revenue loss of approximately \$19.1 million for this application type (see Attachment 5). To achieve full cost recovery for average annual processing costs of approximately \$38.9 million, the City would have to considerably increase fees for all Site Plan Control applications, regardless of size or type (i.e., residential, non-residential, mixed use).

In 2025, the City is undertaking a comprehensive review of its Site Plan Control application review process, leveraging a Lean Six Sigma methodology to streamline review activities with the goal of reducing processing costs and simplifying the fee schedule. As Recommendation 3 indicates, staff expect to report back to Council with an updated service standard and fee schedule for Site Plan Control applications by Q3 2026. Until that time, staff recommend less than full cost recovery for Site Plan Control application review, with 25 percent of increased average annual processing costs (approximately \$4.8 million) recovered through fees. This approach requires 75 percent of increased average annual processing costs to be recovered from alternative sources of funding (approximately \$13.7 million), which will be managed through non-application-based revenues, when necessary. Attachment 1 to this report reflects the recommended approach. Attachment 6 to this report includes a summary of existing Site Plan control application fees, an option for full cost recovery based on the findings of the 2024 Review, and the recommended option to recover 25 percent of increased processing costs from fees.

### **Committee of Adjustment Application Fees**

In June 2022, City Council adopted the recommended fee schedule resulting from the 2021 Fee Review except for recommended increases to Minor Variance and Consent application fees. The 2021 Fee Review recommended a 42 percent increase in Minor Variance application fees and a 58 percent increase in Consent application fees. The recommended fee increase reflected increased staff level of effort for circulation and commenting on applications. Holding fees steady at 2021 levels resulted in an average annual under-recovery of approximately \$5.33 million in processing costs.

To comply with the City's Corporate Strategic Plan objective of financial sustainability, through the 2024 City Budget process, Council considered a plan to restore Committee of Adjustment application fees to the levels recommended through the 2022 Fee Review over a period of three years (2024-2026).

On April 1 2024, the City implemented a 10 percent increase to both Minor Variance and Consent application fees. Cost of Living Adjustments (4 percent in 2025) were applied as usual to Committee of Adjustment fees on January 1, 2025.

The 2024 Review shows that the cost of processing Minor Variance and Consent applications has increased since the 2021 Review, resulting in an average annual under-recovery of approximately \$13.0 million. Through the upcoming Committee of Adjustment Service Delivery Model Review (anticipated in Q3 2025), staff may recommend further changes to Minor Variance and Consent application fees, as well as organizational structure, process and technology improvements that impact Minor

Variance and Consent application fees. Committee of Adjustment fees will be reconsidered through a follow-on Fee Review.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information as presented in the Financial Impact section.

## **EQUITY IMPACT STATEMENT**

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The City's User Fee Policy ([2011.EX10.2](#)) sets out a consistent and transparent approach for establishing and managing user fees. The fundamental principle of the Policy is that user fees should be used to finance those City services that provide a direct benefit to the specific users and that user fees should be set to recover the full cost of those services to the extent that there is no conflict with City policy objects and other legislative requirements (e.g., those specified under the *Planning Act*). Services that benefit the entire community should be funded by property taxes. The City cost-recovers for activities related to processing development applications under Chapter 441 of the Municipal Code.

The development application fees recommended in this report have been analysed at the definition and planning stage for potential impacts on Indigenous, Black and equity-deserving groups of Toronto. Availability, access and affordability of housing is complex, requiring an all-of-government and community response. While the housing crisis is widespread, it impacts Black, Indigenous and equity-deserving communities more significantly than others. Systemic and institutional barriers have resulted in lower household incomes and as a result, the high cost of housing has pushed equity-deserving and lower income Torontonians farther from home ownership, rental options and overall economic security. Housing developers typically pass increases in development application fees (and other fees and charges associated with development) to the end user. The recommended fee schedule included in this report has been significantly restructured to minimize the per unit impact of any recommended development application fee increases.

## **DECISION HISTORY**

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At its meetings of January 29, April 5, July 11 and October 30, 2024, and April 10, 2025, the Planning & Housing Committee adopted quarterly Development Review Timeline Metrics reports that show improvement over time across four metrics, including average timelines for the pre-application consultation process and average time to decision for combined Official Plan Amendment/Zoning By-law Amendment, standalone Zoning By-law Amendment and Site Plan Control applications.

[Q1 2025 Report: https://secure.toronto.ca/council/agenda-item.do?item=2025.PH20.5](https://secure.toronto.ca/council/agenda-item.do?item=2025.PH20.5)

At its meeting of February 15, 2024, City Council adopted 2024 Operating and Capital Budgets for all divisions, including the 2024 Operating Budget for City Planning, which described a phased approach to increasing Minor Variance and Consent application

fees over a three-year period (2024-2026). The phased approach included a 10 percent increase in 2024, and identified the need for subsequent increases in 2025 and 2026.  
<https://secure.toronto.ca/council/agenda-item.do?item=2024.MPB15.1>

At its meeting of December 15, 2022, City Council adopted, as amended, the report "Implementing Bill 109 - The *More Homes for Everyone Act*, 2022," from the Interim Deputy City Manager, Infrastructure and Development Services regarding the City's approach to addressing the impacts of the legislation, including the addition of 150 net new development review staff positions.  
<https://secure.toronto.ca/council/agenda-item.do?item=2023.EX1.4>

At its meeting of June 15, 2022, City Council adopted the Development Application Fee Review and directed the Deputy City Manager, Infrastructure and Development Services in consultation with the Chief of Staff, City Manager's Office and the Chief Planner and Executive Director, City Planning, to undertake a follow-on development application fee review and report back to Council with recommendations by Q4 2024.  
<https://secure.toronto.ca/council/agenda-item.do?item=2022.PH34.6>

At its meeting of January 17, 2012, City Council adopted a cost recovery model for Development Application Review Fees in accordance with the User Fee Policy.  
<http://www.toronto.ca/legdocs/mmis/2011/bu/bgrd/backgroundfile-42723.pdf>

At its meeting of September 26-27, 2011, City Council adopted Executive Committee Report EX10.2, to implement a User Fee Policy.  
<http://www.toronto.ca/legdocs/mmis/2011/ex/bgrd/backgroundfile-40701.pdf>

## COMMENTS

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The Comments section of this report is organized into three parts, as follows:

- **Part 1 - Approach & Methodology:** Overview of the development review process and the rationale and methodology for the 2024 Development Application Fee Review.
- **Part 2 - 2024 Review Outcomes:** Outcomes of the 2024 Review study and recommended updates to development application fees.
- **Part 3 - What's Next:** Ongoing transformation of the development review process to support improved service delivery.

### Part 1 - Approach & Methodology

#### The Development Review Process

Development review shapes how the city grows and delivers services necessary to successfully promote and manage growth. The development review process is critical to developing affordable housing, securing parkland, driving economic growth and job



creation, supporting landmark projects, and delivering complete communities that meet approved service standards and regulatory requirements across Toronto.

Toronto's development review process is complex in nature, strengthened by the participation and expertise of a range of professional staff. It is a mature and robust system that both supports and informs engagement with public stakeholders. Over the period of study for the 2024 Review (2017-2020 and 2023), the City received an average of 460 development applications annually. Additionally, Committee of Adjustment received an average of 3,571 applications annually.

### **Addressing Operating Model Changes through the 2024 Review**

The City has addressed significant changes to the land use planning system in Ontario, continued growth pressure, and the increasing complexity of development applications through both incremental and transformational change initiatives over several years.

In September 2019, City Council adopted the End-to-End Review of the Development Review Process final report, which recommended a new operating model for development review to improve organizational structure, process improvements and technology. Implementation of the new operating model began in March 2020 through the Concept 2 Keys (C2K) program which has since been integrated into the new Development Review Division. A new organizational structure, described below, and ongoing process and technology improvements are reflected in the recommended fee schedule.

#### *Organizational Structure*

In June 2023, to expedite implementation of the new operating model in response to the housing crisis, and successive changes to provincial legislation (including Bill 109, Bill 23, Bill 97 and Bill 185), the City established a new centralized service area, Development and Growth Services, and appointed a new Deputy City Manager. All development and growth-related services and functions in the City, including processing development applications, are now reporting to the Deputy City Manager, Development and Growth Services. The City divisions under Development and Growth Services include: City Planning, Toronto Building, the Housing Secretariat, the Housing Development Office and the Development Review Division (Development Review) which was created in 2024.

Development Review's mandate is to expedite the review of all development applications received by the City, with a focus on getting more homes, notably affordable homes, built faster within complete communities. Currently, Development Review comprises a multi-disciplinary team of Community Planning, Engineering Review (Development Engineering and Transportation Review), the former C2K Program, and Development Process and Performance staff.

#### *Process and Technology Improvements to Date*

Achieving expedited development application review timelines relies on a development

review process supported by clear standard operating procedures and modern technology. Since the 2021 Review, the City has:

- Implemented a mandatory pre-application consultation process. In June 2024, Bill 185 removed a municipality's ability to require pre-application consultation by by-law; however, the City continues to offer a formal pre-application consultation process on a voluntary basis.
- Advanced several city-initiated Official Plan Amendments and Municipal Code Amendments to implement changing provincial legislation, streamline development review processes, exempt certain development types from development review processes, and/or clarify application requirements.
- Updated over 50% of the Terms of Reference posted to the City's [Development Guide](#) to provide clear guidance to both applicants and staff regarding complete application requirements.
- Implemented new application circulation processes to ensure review of complete applications and improve commenting timelines.
- Implemented Phase 1 of Plan of Condominium process improvements to expedite clearance of conditions.
- Implemented approximately 60 enhancements per year to the City's backend workflow management software (i.e., IBMS), to support improved file management practices.
- Continuously improved the Application Submission Tool (AST) to support the application intake process, with a new resubmission function expected to be launched in 2025.
- Developed a pilot of the new File Circulation Tool (FCT) to improve circulation, collaboration, commenting, and performance tracking between City staff and applicants. The pilot launched at the end of Q1 2025.

## **Legislative Authority to Collect Fees**

Divisional costs to process average annual application volumes are recovered through the fees established under Chapter 441, Fees and Charges, Appendix C - Schedule 13 of the Municipal Code.

The *Planning Act* enables municipalities to impose fees by by-law for the purpose of processing applications under the *Act*. In determining the associated fees, Subsection 69(1) of the *Planning Act* requires that a tariff of fees "shall be designed to meet only the anticipated cost to the municipality or to a committee of adjustment...in respect of the processing of each type of application provided for in the tariff." As such, the City is only permitted to cost-recover for activities related to processing development applications and not broader development review-related activities such as policy development and participation in Ontario Land Tribunal processes (e.g., mediation, contested hearings).

The City's User Fee Policy ([2011.EX10.2](#)), identifies four categories of user fee. Most development application fees fall into the "full cost recovery" category. The User Fee Policy requires periodic review of user fees following a Full Costing Model to account for the direct, indirect and capital costs of providing a service. To meet this requirement, the Development Application Fee Review employs an Activity Based Costing model, described in detail below.

## Activity Based Costing

In 2012, the City established an Activity Based Costing (ABC) model for development application fees. The City has undertaken two subsequent reviews of those fees - first in 2016 and again in 2021 - using the ABC method. The 2024 Review employs the same method; however, all inputs have been reassessed from first principles (e.g., development of new process maps, a broad survey to determine staff level of effort, etc.) versus a more limited update of existing inputs in the 2016 and 2021 Reviews.

An ABC methodology assigns resource costs to the various activities undertaken through the development review process. Conventional municipal accounting structures that focus on the activities of a single business unit do not adequately capture the integrated, interdivisional effort required to process development applications. An ABC approach provides a robust methodology focused on specific application types (versus business units), enabling a full cost recovery approach.

This methodology attributes processing effort and associated costs from all participating City business units to identified user fee service categories (i.e., development application types). The resource costs attributed to each activity include direct operating costs, indirect support costs and capital costs. See Attachment 7 for a full description of each type of cost. Support costs are directly allocated to business units, while accumulated costs (i.e., direct, indirect and capital costs) are distributed across the various development application types (and other non-development City services) based on the business unit's direct involvement in development application review activities. Each business unit's direct involvement in development application review activities is established by the relative level of effort staff contribute to each activity within a defined "process map" for each application type.

## 2024 Review Methodology

In June 2022, Council adopted the recommendations of the 2021 Review ([2022.PH34.6](#)), including a step-wise approach to addressing several matters in a follow-on review:

- Development of new process maps that reflect process improvements, technology upgrades and other requirements with implications for staff complement and level of effort; and
- A thorough complement assessment to address long-standing challenges related to staff capacity.

In response to Bill 109: *More Homes for Everyone Act, 2022*, staff completed a comprehensive complement assessment and recommended the addition of 150 net new positions across divisions engaged in development review to address significantly reduced legislated timelines ([2023.EX1.4](#)).

Considering recommendations stemming from the 2021 Review and a significant increase in complement, the 2024 Review followed the methodology outlined below:

- Process map development for each development application type and other key services or sub-processes to reflect ongoing process improvement and technology upgrades.
- Comprehensive level of effort survey of over 460 staff who process development applications to gauge staff involvement in specific development review activities.
- Comprehensive review of staff resource capacity utilization, including the addition of 150 net new positions participating in application processing.
- Review and updates to direct, indirect and capital costs of processing activities.
- Updates to development application fee structures. In some cases, fee structures have been altered.
- Measurement and reporting on financial impacts of the proposed cost recovery fee structures.

### *Program Analysis: Process Maps, Staff Level of Effort and Capacity Analysis*

The City conducted a program analysis to:

- Document current and revised processes, including key activities and roles and responsibilities of staff and groups involved in the processing of development applications;
- Determine the level of effort required by staff to process a development application; and
- Validate staff capacity available against the effort required to process and review development applications at the City's target service levels.

The program analysis included a comprehensive process and activity mapping exercise, a review of the tools and technology used to support the process, and an assessment of the roles and responsibilities of staff and groups involved in the circulation, review, and decision-making associated with development review.

The application types included in the 2021 Review served as a baseline in 2024. Process maps for all application types were developed through 45 staff workshop sessions over an approximately eight-month period in 2023-2024. Process maps account for significant adjustments to account process and technology since 2021. New process maps were established for other key services (e.g., pre-application consultation) and specific sub-processes (e.g., application intake).

To assess the level of effort associated with processing development applications, staff participated in a survey to document the staff time required to process each development application type. The survey included questions about the time-related impacts of different application characteristics, including development type, size, built form and location. The resulting dataset included responses from over 460 City staff from 15 divisions.

Survey data was a key input into the capacity analysis. A capacity analysis identifies whether the City has sufficient staff resources to undertake each process, according to the time estimates provided in the level of effort assessment. For each application type, the capacity analysis considered historical annual volume and circulation data against approved complement and level of effort inputs. The results of the capacity analysis

were validated through a two-step process with Directors and Managers in each participating Division.

### *Average Application Volume*

Average annual development application volumes, as summarized in Attachment 2, were calculated using 2017-2020 and 2023 data. Application volumes for the years 2021 and 2022 were excluded from the analysis as they represent much higher than average volumes. Over the period of study for the 2024 Review, the City received an average of 460 development applications annually. Additionally, Committee of Adjustment received an average of 3,571 applications annually.

On aggregate, the 2024 Review showed an approximately 7% decrease in volume of new development applications (excluding Committee of Adjustment application) over the 2021 Review. On a per application type basis, between the 2021 and 2024 Reviews, the City saw an increase in the application types that historically require the most staff effort to review, including a 25% increase in combined Official Plan Amendment and Zoning By-law Amendment applications. During the same period, due in part to the cyclical nature of application types, the volume of Site Plan Control applications decreased by 13%. While Committee of Adjustment applications are excluded from the 2024 Fee Review cost model analysis, Minor Variance and Consent application volume trends were analyzed. Committee of Adjustment application volume decreased by approximately 5% on aggregate from 3,750 in the 2021 Review to 3,571 in the 2024 Review.

### *Staff Complement*

Staff complement dedicated to processing development applications changed significantly between the 2021 and 2024 Reviews. As noted above, in December 2022, Council approved 150 net new positions across divisions engaged in development application review. Note that since the time of approval, one position type no longer exists and has since been removed, resulting in a total of 149 net new positions. As of March 2025, the City has filled 136 (91%) of the new positions (see Table 1). As a result of efforts to fill net new positions, existing vacancies were also filled leading to an overall decrease in divisional vacancy rates compared with the 2021 Review. Across divisions engaged in development application review, direct staff involvement in processing development applications has increased by 13% (i.e., 405 versus 360 Full Time Equivalents (FTEs)) between the 2021 and 2024 Reviews. Planning staff in both the City Planning and Development Review Divisions account for 45% of direct processing effort, or 183 FTE. Note that direct processing effort includes a narrow set of activities. The FTE figures for direct processing effort noted above are not the same as "staff complement," which is simply the total number of approved staff positions.

**Table 1 - Summary of Net New Staff Complement by Division and Unit**

<b>Division and Unit</b>	<b>Positions Approved (December 2022)</b>	<b>Positions Filled (October 2024)</b>
City Planning - All Units	74	71
Engineering and Construction Services - Development Engineering	5	5
Legal Services - Planning and Administrative Tribunal Law	4	3
Parks, Forestry and Recreation - All Units	24	21
Toronto Building	9	8
Toronto Water - Water Infrastructure Management	14	12
Transportation Services - Planning & Capital Projects	19	15
<b>TOTAL</b>	<b>149*</b>	<b>136</b>

\* Note that since the time of approval, one position type no longer exists and has since been removed, resulting in a total of 149 net new positions.

Complement input was carefully re-evaluated through the 2024 Review to ensure the estimated processing activities underlying the new fee structures are current, reasonable and defensible. As such, the results of the 2024 Review represent the cost to provide the development review service today, based on approved staff complement, and do not include the costs of future complement. Additionally, staff level of effort within the divisions included in the 2021 Review was updated through a broad staff survey and management team validation to reflect current involvement in development application review.

#### *Costs of Development Application Processing Activities*

As noted above, the estimated costs of processing development applications include direct, indirect and capital costs. These costs have been updated and included based on the following:

- Direct salary and benefit costs, and overtime costs, based on the 2024 City Budget;
- Other direct costs (e.g., materials, supplies, etc.) were calculated based on the 2024 City Budget;

- Indirect costs were calculated using the full costing model principles approved by City Council in 2012. These include program support costs based on 2023 values indexed to 2024 dollars and corporate managed items based on 2022 values indexed to 2024 dollars.
- Capital costs were updated using a more comprehensive capital asset database and allocation methodology, based on 2022 values indexed to 2024 dollars.

## Part 2 - Review Outcomes

### Annual Processing Costs

Table 2 below summarizes the annual cost of processing development applications at a macro level. Between the 2021 and 2024 Reviews, the average annual processing costs for development applications increased to \$80.1 million (excluding Committee of Adjustment applications). This represents an increase of approximately \$12.9 million (19%). While direct costs increased by \$17.3 million, indirect costs decreased by \$3.8 million and capital costs decreased by \$0.6 million. Indirect cost reductions are due in part to the recategorization of former C2K program costs from indirect to direct.

The key driver of increases in annual processing costs is salaries and benefits (S&B). Two factors contributed to increased costs since the 2021 Review: Council-approved increases to staff complement and increases to staff salaries (e.g., City Planning's Employee Talent, Retention and Attraction report ([2023.EX1.5](#))). Direct S&B cost increases are attributable to increased staff involvement in application processing from 360 FTEs to 405 FTEs. These direct S&B costs increased by approximately \$15.1 million between 2021 and 2024. Indirect S&B costs decreased as staff in business units that were previously indirectly involved in application processing shifted portions of their effort to direct processing activities (e.g., the former C2K Program and other business support functions).

**Table 2: Costs by Component (excluding Committee of Adjustment costs)**

	Total Costs (\$2024, in millions)		
	2016 Review	2021 Review	2024 Review
Direct Costs			
• Salaries and Benefits (S&B)	34.49	45.74	60.81
• Non-S&B	1.88	1.51	3.73
<b>Total Direct Costs</b>	<b>36.37</b>	<b>47.25</b>	<b>64.55</b>
Indirect Costs			

	Total Costs (\$2024, in millions)		
	2016 Review	2021 Review	2024 Review
• Internal	0.51	4.72	0.93
• External	5.73	8.51	11.14
Corporate Managed Items	2.28	5.11	2.44
<b>Total Indirect Costs</b>	<b>8.52</b>	<b>18.33</b>	<b>14.50</b>
<b>Capital Replacement Costs</b>	<b>0.93</b>	<b>1.60</b>	<b>1.04</b>
<b>Total Costs</b>	<b>45.83</b>	<b>67.19</b>	<b>80.09</b>

Table 3 below summarizes the annual cost of processing development applications by participating division and cost category. The distribution percentage represents the portion of revenues that each division will receive based on their respective processing costs, if the fee schedule set out in Attachment 1 is adopted. Note that rounding of total annual costs may result in minor discrepancies in distribution percentages.

As noted above, in September 2024, Community Planning, Development Engineering, Transportation Review, the former C2K Program, and other business support functions completed their transition to the Development Review Division. While divisional organizational structures have changed, the 2024 Review reflects a status quo structure to ensure alignment with the 2025 City Budget process. Adjustments to divisional cost and revenue allocations will occur through the 2026 City Budget process.

**Table 3: Cost to Provide Development Review Services (excluding Committee of Adjustment costs)**

Division	2024 Annual Costs (\$2024, in millions)					
	Direct S&B	Direct Non-S&B	Indirect	Capital	Total	Distribution%
City Planning*	27.25	0.56	8.18	0.60	<b>36.61</b>	<b>45.7%</b>
Engineering & Construction Services*	7.41	0.23	1.33	0.15	<b>9.13</b>	<b>11.4%</b>
Former Concept 2 Keys Program*	6.23	2.05	0.83	0.06	<b>9.17</b>	<b>11.4%</b>



Division	2024 Annual Costs (\$2024, in millions)					
	Direct S&B	Direct Non-S&B	Indirect	Capital	Total	Distribution%
Toronto Water	4.84	0.27	0.99	0.01	<b>6.12</b>	<b>7.6%</b>
Parks, Forestry & Recreation	5.40	0.21	0.09	0.00	<b>5.70</b>	<b>7.1%</b>
Legal Services	3.86	0.08	0.30	0.06	<b>4.29</b>	<b>5.4%</b>
Transportation Services*	2.69	0.00	1.02	0.56	<b>3.77</b>	<b>4.7%</b>
Toronto Building	1.24	0.04	0.31	0.03	<b>1.63</b>	<b>2.0%</b>
Other Commenting Partners: <ul style="list-style-type: none"> <li>• Fire Services</li> <li>• Solid Waste Management</li> <li>• Environment &amp; Climate</li> <li>• Economic Development &amp; Culture</li> <li>• City Clerk's Office</li> <li>• Corporate Real Estate Management</li> </ul>	1.89	0.27	0.36	0.04	<b>2.57</b>	<b>2.3%</b>
Policy, Planning, Finance & Administration	N/A	N/A	1.08	0.02	<b>1.11</b>	<b>1.4%</b>
<b>Total</b>	<b>60.81</b>	<b>3.73</b>	<b>14.50</b>	<b>1.04</b>	<b>80.09</b>	<b>100%</b>

\*Some or all units within these Divisions or programs transitioned to the Development Review Division in 2024. Divisional or program allocations illustrated in this chart will be adjusted to reflect organizational structure change through the 2026 City Budget process.

## Development Application Fees

To satisfy *Planning Act* requirements, processing costs are categorized by development application type. To assess the individual application type fee adjustments, updated processing costs per application type were compared to the current revenues that would be realized, based on the City's Development Application Fees (as of January 1, 2024) and the underlying charging characteristics (i.e., size) of the applications.

The updated fee schedule (Attachment 1) considers all costs associated with providing development review services (described above), as well as the average application size by type. Application size data is drawn from the City's Integrated Business Management System (IBMS) database for the period 2017-2020 and 2023. Application volume data for 2021 and 2022 was excluded from the analysis due to significant increases in application volumes in those years related to changes in the City's planning framework.

Attachment 5: Cost Recovery by Development Application Type shows the resulting current average annual cost recovery (deficit/surplus), and a per application cost recovery by application type. Cost recovery (deficit/surplus) was calculated by subtracting the costs to carry out the development review service from development application fee revenues. The recommended fee schedule will result in full cost recovery for most application types, except for Site Plan Control, Minor Variance, and Consent applications. As noted previously, staff recommend recovering 25% of increased Site Plan Control application costs. Recommendations for Minor Variance and Consent application fees will be addressed in a forthcoming report.

### **Changes to Fee Structures**

The City's cost model assumes a direct relationship between the size of an application (i.e., Gross Floor Area (GFA)) and complexity of review (i.e., staff level of effort), to a "diminishing point of effort." In the 2016 and 2021 Reviews, changing development trends led to adjustments to the "diminishing point of effort." The 2021 Review updated some fee structures and, most notably, introduced several "large site" categories for mixed-use development over 100,000 m<sup>2</sup>.

The 2024 Review considered refinements to the fee structure to simplify the administration and support predictable application of the fee schedule. Where calculated variable fees by type of GFA (i.e., residential, non-residential and mixed-use) were comparable based on underlying application characteristics, staff have recommend a uniform fee structure. To better reflect the "diminishing point of effort" exhibited in the processing of applications, the recommended fee structures for combined Official Plan Amendment/Zoning By-law Amendment, standalone Zoning By-law Amendment and Site Plan Control applications were applied to average application characteristics for 2017-2020 and 2023. Recommended maximum charges are based on the exhibited incidence of fees for large applications.

Recommended maximum charges improve predictable application of the fee schedule, maintain a level of cross-subsidization between large and small applications within a single application type, and limit fees that would produce revenues in excess annual processing costs (assuming the application volumes and characteristics included in the cost model are generally maintained).

As a result of the 2024 Review, staff recommend restructuring several fee structures to address further changes in both development and processing trends. Key changes include:

- Removal of multipliers for mixed-use GFA from OPA/ZBA, ZBA and Site Plan Control fee structures.

- Introduction of a single, uniform multiplier that applies to both residential and non-residential GFA for OPA/ZBA, ZBA and Site Plan Control applications.
- Increased base fees for OPA/ZBA, ZBA and Site Plan Control applications as a result of multipliers being simplified or removed.
- Introduction of a maximum fee to establish a ceiling for OPA/ZBA, ZBA and Site Plan Control application fees for large site applications.

## **Changes to Fee Descriptions**

The updated fee schedule (Attachment 1) includes changes to user fee descriptions, described in detail below.

### *New Fee Descriptions*

*1) Site Plan Amendment (Administrative):* Staff recommend adding a new Site Plan Amendment (Administrative) fee to differentiate level of effort for various types of Site Plan Amendments. The existing Site Plan Amendment fee description is applicable to submissions that include updated plans and drawings requiring circulation and review, resulting in an updated Site Plan Agreement. The recommended Site Plan Amendment (Administrative) fee is applicable in cases that do not require circulation or review beyond the Community Planner and the outcome is a letter that confirms the plans and drawings are substantially in accordance with an existing Site Plan Agreement. This new fee description represents an approximate 87% reduction in fees compared to the existing Site Plan Amendment fee.

*2) Plan of Condominium - Routine & Technical Review Streams:* Reflecting recent improvements to the Plan of Condominium review process, the base fee for Plan of Condominium for all condominium types has been adjusted. The City has created two streams of Plan of Condominium application review: 1) Routine and 2) Technical Review.

- The Routine stream includes Standard and Common Element condominium applications with associated Site Plan applications. These application types represent over 90% of the average annual volume of Plan of Condominium applications. Staff have identified minimum application requirements and a standard library of conditions for these application types that do not require circulation to and review by commenting partners outside of Community Planning. Removing circulation to commenting partners for Routine applications eliminates over \$800,000 in average annual processing cost, which is reflected in the recommended fee schedule (Attachment 1 to this report) in the form of reduced application fees. Additionally, staff recommend a simplified fee structure for this application type that removes the existing variable fee per unit.
- The Technical Review stream applies to all other types of condominium applications, including Standard and Common Element without an associated Site Plan application, Phased, Leasehold, Vacant Land and Rental Conversion. Application

requirements for these application types necessitate broader circulation to and review by commenting partners, increasing overall staff level of effort which is reflected in the fee. The fee structure for Technical Review application types has also been simplified.

3) *Plan of Condominium Exemption*: Staff recommend adding a Plan of Condominium Exemption fee description to assist in processing amendments to existing registered Plans of Condominium for which an applicant has requested an exemption from comprehensive municipal review. Plan of Condominium Exemptions are distinct from Plan of Condominium Amendments in that they generally apply to amendments that do not alter the boundary of a registered Condominium, do not result in the creation of new units, and are generally for minor adjustments to the declaration/description that do not result in the need for circulation and review by staff outside of Community Planning. As Plan of Condominium Exemptions do not warrant broader circulation and review, staff recommend that Plan of Condominium Exemptions have a lower fee than Plan of Condominium Amendments.

## **Benchmarking**

To test the reasonableness of the outcomes of the 2024 Review, including findings related to development application processes and average application processing effort estimates, the City's consultants (KPMG and Watson & Associates Economists) undertook a comparative analysis of other GTA municipalities (see Attachment 8). When development application fees are considered alongside Building Permit fees and Development Charges in other municipalities, the outcomes of the City's 2024 Review are competitive with other GTA municipalities. When compared on the basis of development application fees alone, the City often ranks in the top five most expensive GTA municipalities. Importantly, the comparison applies to specific development application types and not to a municipality's fee schedule as a whole. Attachment 8 includes a comparison of sample development application types, showing that the impact of the City's cost recovery fee structure is similar to that of other GTA municipalities. A comparative analysis of fees and/or fee deposits for pre-application consultation services across GTA municipalities is also included in Attachment 9.

The comparison does not reflect the unique development context in Toronto, which is perhaps incomparable in Ontario and in many respects North America, given market conditions and the pace and scale of change in the city. Legislative change between 2022 and 2024 impacted the City in distinct ways compared to other GTA municipalities due to the order of magnitude difference in application volume, staff complement and annual application fee revenue in Toronto.

Many GTA municipalities continue grow through greenfield development. This is not the case in Toronto where the infill planning context often contributes to increased staff effort for review and extensive negotiations related to conditions of approval to account for site constraints and, more recently, tight review timelines. The complexity of review is associated with some application types more than others, including combined Official Plan Amendment and Zoning By-law Amendment, Zoning By-law Amendment and Site Plan Control. Additionally, transformational large sites (e.g., Downsview) and centres

bring specific challenges and opportunities related to changing policy frameworks, infrastructure, ability to support the City's housing targets, and livability.

### **Development Application Fee Policy**

To ensure consistent interpretation and application of fees, staff recommend Council adopt a Development Application Fee Policy (Attachment 10). Development application fees are administered by the Toronto Building Customer Experience team. In the case of questions or a dispute, interpretation of the City's fee schedule is largely at the discretion of the Director, Community Planning, Development Review. The recommended policy will assist frontline staff in resolving questions and disputes, clarify how Director discretion is to be applied, and provide non-discretionary guidance on several matters including:

- Refunds for withdrawn applications
- Additional fees for resubmissions
- Administration of exemptions and waivers available through various City programs
- Administration of certain service charges related to development applications
- Administration of certain City-initiated applications

The Development Application Fee Policy aligns with the Council-adopted Committee of Adjustment Refund Policy implemented by City Planning in November 2019.

### **Consultation and Stakeholder Feedback**

Staff consulted with the development industry in two phases: 1) Fee Review Approach and Methodology, and 2) Findings and Recommendations.

The first phase of consultation took place in July 2024. Staff met with the Toronto Chapter of the Building Industry and Land Development Association (BILD) on July 10, 2024 and with the Residential Construction Council of Ontario (RESCON) on July 22, 2024. Staff met again with BILD on October 29, 2024, and with RESCON on November 4, 2024, to discuss the findings and recommendations of the 2024 Review.

In both discussions, participants emphasized that the City must continue to improve its development review process to reduce application processing timelines and improve its service delivery. Participants in the consultation sessions also raised questions and provided comments related to the City's approach to establishing its development application fee schedule, as summarized below:

#### ***Feedback from BILD:***

- The City should ensure its cost model accurately reflects the processes and level of service being implemented on the ground.
- Application fees should be updated more regularly to capture changes in the organizational structure and updated processes.

- Some BILD members report they have not consistently experienced a more efficient development review process following increases to staff complement while others noted a considerable improvement in service.
- The updated process maps by application type (used as an input into the 2024 Review) should be provided publicly on the City's Development Guide website.
- The City should provide clear timelines for technology implementation (e.g., updates to the Application Submission Tool, rollout of the File Circulation Tool).
- The City should consider applying approaches used in other jurisdictions to limit application fee increases, including application fee caps and fee structures that recognize a declining level of effort even as the Gross Floor Area (GFA) of a proposal increases.
- Some municipalities have recently advanced fee schedule changes that result in decreased fees. BILD members support this approach.
- The City should consider phasing or a period of transition to a new fee schedule as part of its implementation plan.
- The City should undertake a review of the scope of each application type to ensure staff effort is appropriately focused and requirements are identified early instead of through a series of resubmissions.
- BILD members support process and technology updates that improve coordination and tracking of comments.
- In addition to systemic improvements, BILD members support small, everyday improvements to customer service.

In addition to broader consultation with members of industry associations, between October and December 2024, City staff held a series of technical review sessions with BILD to discuss approach and methodology and potential impacts of various fee structures.

*Feedback from RESCON:*

- The City should consider the impact that hiring a large number of new staff has on application processing timelines and staff level of effort. The cost of staff training and development should not be reflected in development application fees.
- Jurisdictional benchmarking is critical to understanding how the City's fee structure compares to other municipalities in the GTA and may indicate where fees can be reduced or removed.
- If staff effort has increased for certain application types, the City should be able to demonstrate that timelines for those applications have decreased.
- RESCON members support approaches that limit application fee increases, including fee caps and the introduction of less costly "administrative" application categories.
- The City should consider the impact of hybrid work on its indirect costs, assuming these costs would be reduced as more staff work from home.
- The City should consider incentivizing pre-application consultation (PAC) through its fee structure following Bill 185.

City staff confirmed that through the ongoing transformation of the development review process, including the establishment of the Development & Growth Service Area and the Development Review Division, the City is committed to improving its level of service and will continue to collaborate with the development industry to implement changes to current business practices.

## **Part 3 - What's Next**

### **Reflections on the 2024 Review: Evolving the Cost-Recovery Model**

As described in Part 1 of this report, the 2024 Review generally follows a methodology first implemented in 2012. Its purpose is straightforward: To evaluate the assumptions upon which development application fees are based and consider the City's degree of compliance with its User Fee Policy. By design, in accordance with Section 69(1) of the *Planning Act*, it provides a current state picture of the costs associated with processing applications in order to establish appropriate fees to recover those costs.

The City is undertaking a multi-year transformation of the development review process, which has highlighted a tension between the current state and anticipated future state needs. For this reason, staff implemented a "from first principles" approach to the 2024 Review, ensuring all inputs (e.g., complement, process maps) reflected the transitional state of the development review service as accurately as possible. This enables the City to recover for the anticipated cost of the service as it continues to evolve.

Findings from the 2024 Review illustrate a need to further investigate or monitor how the City understands and, potentially, funds the development review process in ways that ameliorate the inherent tension between provision of a critical public service and provision of service for a fee. These findings include:

- The divisions engaged in the development review process provide a critical public service that is primarily funded through user fees. The ongoing transformation of the City's development review process is not well-insulated from changing market conditions.
- Positive city-building outcomes rely on many activities that fall outside of the narrow definition of "processing" considered cost-recoverable under the *Planning Act*. These activities include development of city-wide and area-based policy frameworks and staff participation in Ontario Land Tribunal processes.
- The City's interest in meeting its Housing Action Plan targets and maximizing funding from Provincial and Federal levels of government drives implementation of as-of-right policy frameworks that, over time, are expected to reduce application volume and anticipated revenue.
- The expansion of City-initiated programs to incentivize development of affordable housing (e.g., Rental Housing Supply Program, Home Ownership Assistance Program) are, over time, expected to reduce anticipated revenue while continuing to require the same or greater level of direct staff effort to process applications, especially those that are City-supported (e.g. Indigenous and non-

profit housing projects).

## **A Comprehensive Approach to Improving the Development Review Service**

Updates to the City's cost recovery-model impact other aspects of the development review process. In 2025, the Development Review Division will take a comprehensive approach to improving service delivery to enable effective review and good city-building outcomes, including housing. The approach begins with improved revenue management through the implementation of the recommended fee schedule and expands to a broader program to support improved service delivery:

*1) Legislative and Policy Frameworks:* Development review is governed by a complicated regulatory framework that is constantly changing, creating new and different requirements, policies, standards, etc. over time. Initiatives that support consistent and timely interpretation and application of the regulatory framework, including up-to-date application requirements and circulation practices, support good city-building outcomes.

*2) Development Review Service Standard:* Service standards establish the average timeline to decision for each application type. The service standard is different from the prescribed day on which an applicant can appeal the City for refusal or non-decision under the *Planning Act*. Reasonable service standards provide predictability to all stakeholders in the development review process. They are measurable and can be adjusted to reflect changes in Standard Operating Procedures. The approach to developing a new Development Review Service Standard is described in more detail, below.

*3) Priority and Streaming:* Development applications that advance the City's strategic priorities or specific policy objectives may be prioritized in various ways for review. Depending on certain application characteristics, applications may also be streamed into various categories. Some categories of applications may warrant a separate service (e.g., the Priority Development Review Stream). Criteria to support consistent streaming and prioritization of applications are generally defined through a Development Review Service Standard.

*4) Standard Operating Procedures (SOPs):* SOPs provide clear guidance for the review of each application type. SOPs identify both milestones and more detailed activities, describe the sequencing of those activities, and identify the procedures and tools that are available to support each activity. SOPs provide critical training material for staff and support the implementation of a consistent development review process city-wide. Key Performance Indicators (KPIs) measure performance at the milestone and activity level and provide insight into how SOPs may need to be adjusted. Standard Operating Procedures include regular updates to the official public record of a development application to enable better tracking.

*5) Complement Management:* A predictable yet dynamic allocation of staff resources to active applications enables the City to process applications against the Service Standard, addressing priorities as they arise across geographic districts, while minimizing backlog.



6) *Technology Improvements*: As noted earlier, a pilot of the new File Circulation Tool launched in Scarborough district in Q1 2025. The File Circulation Tool will help improve application workflow management and tracking. The Application Submission Tool will also continue to be updated to include a new resubmission function.

7) *Improved Communication*: In 2025 staff will look at introducing new digital and analog methods to improve communication with all stakeholders in the development review process. This includes public facing tools to track performance more consistently and transparently (e.g. digital dashboards).

## **2025 Priority Improvement: Site Plan Process Review**

In 2025, the City is re-engineering its Site Plan Control application review process with a focus on streamlining review activities to reduce processing costs.

The City currently offers a "one-size-fits-all" service for Site Plan Control application review. As described under the "Changes to Fee Structures" section of this report, the City's fee schedule assumes a direct relationship between the size of an application and complexity of review to a "diminishing point of effort." The findings of the 2024 Fee Review indicate a need to right-size Site Plan review and establish a range of Site Plan Control application review services to better reflect the range of applications submitted to the City. As noted earlier, in addition to applications that propose significant affordable housing, those that propose a significant amount of rental housing will also be considered for expedited and prioritized reviews.

As a result of the findings of the 2024 Review, in early 2025 the Development Review Division initiated a Site Plan Process Review. The purpose is to establish a Site Plan review process that:

- Advances the City's strategic and policy objectives to achieve good city-building outcomes.
- Meets the diverse needs of various internal and external customers.
- Conforms to and implements the intent of the *City of Toronto Act*, the *Building Code Act*, the Official Plan and the City of Toronto Municipal Code.
- Follows clear and consistent standard operating procedures that support timely decision-making, complement management, and revenue management.

The Site Plan Process Review commenced in early 2025. Staff anticipate a report back to Council by Q3 2026, including details related to new Site Plan review services such as application requirements, scope of review, approval mechanism, and fees. Until that time, staff recommend less than full cost recovery for Site Plan Control application review.

At the same time, staff recommend that the current Site Plan Control fee structure be updated to align with structural changes recommended for other application types (e.g., uniform additional fees, a maximum charge). This approach achieves near-term benefits to applicants by simplifying administration of fees and, in some cases, reducing

application fees for certain Site Plan applications while the Site Plan Process Review is underway (see Attachment 6).

### **Preparing for the Next Development Application Fee Review**

Following implementation of the recommended fee schedule and two follow-on reports (a report for the Committee of Adjustment Service Delivery Model Review by Q3 2025 and a report recommending updated Site Plan Control application fees by Q3 2026), staff recommend returning to a four-year cycle for the next comprehensive Fee Review, as supported by the City's User Fee Policy. Returning to a four-year cycle for the next comprehensive Fee Review allows time to further investigate or monitor some of the findings outlined in this and subsequent reports, ensures alignment to a City Budget that reflects updated organizational structures, and will reflect implementation of further process and technology improvements (e.g., updated Site Plan Control application review services).

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### **SIGNATURE**

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### **ATTACHMENTS**

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**Attachment 1:** Revised Fee Schedule - Municipal Code Chapter 441, Fees and Charges, Appendix C - Schedule 13

**Attachment 2:** Average Annual Development Application Volumes by Type

**Attachment 3:** Development Application Fee Structure Recommendations

**Attachment 4:** Approved Committee of Adjustment Fees

**Attachment 5:** Cost Recovery by Development Application Type

**Attachment 6:** Comparison of Current and Recommended Site Plan Control Application Fees

**Attachment 7:** Direct, Indirect and Capital Costs

**Attachment 8:** Fee Impact and Municipal Comparisons

**Attachment 9:** Pre-Application Consultation Fee Comparisons

**Attachment 10:** Development Application Fee Policy