



**MORE NEIGHBOURS
TORONTO**

Dear Planning & Housing Committee,

Re: 2025.PH21.3 - Development Application Fee Review

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 is uncertain that the City is meeting its service standard for development review and suggests deferring this decision until that information is available. We have [previously supported](#) application fee increases conditionally, with the hope that increased staffing would improve processing times. Although this report suggests a significant improvement, there have been changes in the way that the City accepts applications and measures processing times that do not allow for a direct comparison. Given that some stakeholders report that they have not observed an improvement, it seems wise to wait for better data.

In this year's budget, [City Planning](#) used a large number of asterisks to indicate that only 34% of OPA/Rezoning applications were decided within 18 months before July 2023 and Bill 109. After July 2023, 100% of applications met the 18 month decision standard, but the City stopped accepting Site Plan Applications concurrently with Zoning Applications, meaning that the real improvement for full application processing times is not clear. In addition, this corresponded to a period when [the number of submitted applications fell](#) and then the province removed financial penalties for missed timelines in Bill 185. While we hope that the City's restructuring allows it to meet processing times in the event of increased applications and without looming financial penalties, it seems wise to wait until this is clear.

We applaud the work that has been done to reduce processing times for the Committee of Adjustment. These fees are not being increased beyond inflation, unless the review later this

year indicates that is necessary. We would potentially support a fee increase here if needed to continue maintaining this service level. We would also encourage Council to continue the excellent work that has been done to increase as-of-right permissions for multiplexes and Major Streets, particularly to examine the information in the monitoring reports to determine whether there are opportunities to adjust the by-laws and reduce unnecessary Minor Variance applications.

However, for Official Plan and Zoning Bylaw Amendments, this review only accounts for the increased staff time that has been spent on applications, not whether outcomes have improved. As noted in the report, there have been a number of provincial changes and reversals that have added to staff workload. However, we would also encourage councillors to consider when their own requests add to the workload and whether these requests result in improvements or reflect the increased time and money spent. Some recent examples include:

1. In a recent [update of the development review and community consultation process](#) (PH14.5), staff reported spending “a cumulative 190 hours on logistics... for each community consultation meeting.” As an occasional attendee of these meetings, much of the City’s process and materials are repeated and it seems likely that this process could be better streamlined. However, more concerningly, 62% of people participating in the meetings said that they were not satisfied with the opportunities to provide feedback and 73% felt that their feedback was being taken into account. The time and effort being spent does not seem to be reflected in the outcomes, at least from the public participants’ point of view.
2. On September 19, 2024, the City held a consultation about downzoning Craven Rd. The meeting took place in the evening and nine City staff from various divisions were listed in attendance. This was a meeting where the City was considering removing Garden Suite permissions that had only just been implemented in 2022.
3. The City has taken to splitting City-initiated items into incremental changes, each with their own consultations. For example, there were four separate items related to Avenues in the Housing Action Plan. In one of these, the Avenues Policy Review was split into two phases. And now it appears that Phase 2 may be split into three stages. Not only does consulting on each stage and Phase make the overall plan less clear to the public, but much of the logistical work has to be repeated. In addition, several councillors stated that they did not feel that the 25 public consultations for Phase 1 of the Avenues Policy Review was sufficient.

This is a pattern that we have noticed with several items, both City-initiated and developer-initiated rezonings, where one or two people who depute might feel dissatisfied and councillors conclude that the consultation must not have been meaningful. More Neighbours works to encourage people to attend public consultations, but this becomes difficult when their contributions are so easily dismissed. We strongly encourage councillors to read the Public Consultation section of staff reports, rather than relying solely on the word of those who are able to make it to midday Committee meetings and moving to redo work that was already completed. This trend may be a contributor to the increased staff time spent on applications, despite the high levels of dissatisfaction with the outcomes.

There are those who will say that you cannot put a price on local democracy, but this cost recovery process outlines a way of doing just that. Just because the costs are not borne by the general property tax base does not mean that the costs do not impact any residents or Toronto as a whole. It would be convenient if these costs were to come exclusively out of developer profits, but [recent news stories](#) suggest that projects are being cancelled and increased costs will likely result in fewer homes. We were pleased to see the City recently recognize this in its recent development charge freeze (MM29.16) as well as in its rental incentive program. More Neighbours will continue to encourage the provincial and federal governments to contribute and expand on this work.

In the meantime, we ask you to defer this item until better data about application processing times are available.

Sincerely,

Colleen Bailey,
More Neighbours Toronto