TORONTO

REPORT FOR ACTION

Site Plan Application Fee Review

Date: July 2, 2026
To: Planning and Housing Committee
From: Deputy City Manager, Development and Growth Services
Wards: All

SUMMARY

This report recommends an updated application fee schedule for Site Plan Control applications (see Attachment 1, reference numbers 80 to 84.1) to reflect service delivery improvements identified through the City's ongoing Site Plan Process Review (see Attachment 2).

This report should be read as an update to the 2024 Development Application Fee Review report (the 2024 Review). Council approved the 2024 Review with a modest fee increase in May 2025 and requested staff to undertake a focused Site Plan Process Review and report back by the third quarter of 2026. Should Council adopt the recommendations of this report, some Site Plan application fees will remain status quo while others will be reduced.

RECOMMENDATIONS

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 January 1, 2027, substantially in accordance with the revised fee schedule as found in Attachment 1 to this report.

2. Upon the by-law to amend the City of Toronto Municipal Code, Chapter 441, Fees and Charges, Appendix C - Schedule 13 coming into effect, City Council authorize the repeal City of Toronto By-law 946-2023 to "adopt Amendment 688 of the Official Plan of the City of Toronto respecting adding a new complete application requirement for Site Plan Control."

3. City Council authorize the City Solicitor to make such stylistic and technical changes to the Bills submitted to Council giving effect to Recommendation 1above, as may be required, and authorize the City Solicitor to submit a Bill to Council to repeal By-law 946-2023 upon the coming into effect of amendments to Chapter 441 as set out in Recommendation 2 above.

FINANCIAL IMPACT

The financial impacts outlined in this report result from recommended changes to the City's development application fee structure, detailed in Attachment 1. Alignment to the financial implications related to staff resourcing or otherwise will be assessed through the 2027 and 2028 Budget process.

The 2024 Review showed that the City's Site Plan review service does not operate at full cost recovery, producing an under-recovery of approximately $13.7 million annually. To address this, Council requested staff review and report back by the third quarter of 2026 on two key objectives:

- Reduce the City's cost of processing Site Plan applications (i.e., the time, in hours, it takes for staff to review an application).
- Increase cost recovery for the Site Plan service (i.e., how much of the City's costs are recovered from application fees).

Municipal 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*. Further to this legislated authority, 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.

Within this framework, Council adopted the 2024 Development Application Fee Review (2024 Review) in May 2025. The approved fee schedule, which went into effect on July 1, 2025, applies to all development application types, excluding Committee of Adjustment applications, and generates average annual revenues of $62.8 million against annual average processing costs of $80.1 million. This resulted in an annual average gap in revenue of approximately $17.3 million at the time of the 2024 Review; however, the true gap is determined and reconciled annually based on application volume and fee revenue actuals.

Site Plan Application Review Cost Recovery

To address the gap in revenue associated with the City's Site Plan review service, Council directed staff to leverage a Lean Six Sigma methodology to streamline Site Plan review activities with the twin goal of reducing processing costs and improving cost recovery.

The cost of the review of Site Plan applications represents approximately 48 percent of the City's total cost ($80.1 million) of providing the development application review service. The 2024 Review identified annual Site Plan processing costs of approximately

$38.8 million and anticipated annual average revenue of $25.1 million, reflecting approximately 65 percent cost recovery for the existing review service. Approximately $13.7 million (79 percent) of the of the City's total $17.3 million revenue gap is attributable to Site Plan processing.

This report details the findings of the Site Plan Process Review, increases cost recovery from 65 to 73 percent on aggregate. Improved cost recovery is achieved by reducing the cost of processing for Site Plan applications from approximately $38.8 million to $25.7 million annually (a 34 percent reduction). The goals of reducing processing costs, improving cost recovery and continuously improving customer experience are achieved through the introduction of a streamed Site Plan review service, enabling a more proportionate allocation of resources, together with updated application volume assumptions reflecting current development trends.

Recommended Fee Schedule

The recommended fee schedule continues to under-recover the cost of Site Plan review services by approximately $6.3 million per year (down from $13.7 million). This gap in revenue will continue to be recovered from alternative sources of funding, which may include non-application-based revenues, when necessary. Additional adjustments to address the revenue gap may be considered through the 2027 Budget process with follow-up reporting. Table 1 below includes a comparison of 2024 Review and Site Plan Process Review outcomes.

Table 1 - Comparison of 2024 Review and Site Plan Process Review Outcomes

	2024 Review	**2026 Site Plan Review**	**Change**
Cost of Processing Site Plan Applications (Annual Average)	$38.8 million	$25.7 million	-$13.1 million (-34%)
Site Plan **Application Revenue (**Annual Average)	$25.1 million	$18.8 million	-$6.3 million (-25%)
Cost Recovery	65%	73%	+8%
Revenue Gap	$13.7 million	$6.3 million	-$7.4 million (-54%)

Site Plan application fees are categorized as "full cost recovery" under the City's User Fee Policy and are automatically adjusted for inflation on January 1 of each year.

Should the recommended fee schedule be adopted, the annual cost of living adjustment (COLA) amount will be automatically applied to the dollar values shown in Attachment 1 on January 1, 2027, when the fee schedule comes into effect.

The recommended fee schedule assumes that staff will spend less time than they currently spend processing Site Plan applications. Development application fee revenue allocations will remain proportional to divisional effort; however, overall divisional effort for providing Site Plan review services will decrease. This report does not propose any immediate changes to staff resourcing. Complement management planning will continue through the 2027 and 2028 Budget process. The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information as presented in the Financial Impact section.

DECISION HISTORY

At its meeting of May 21-22, 2025, City Council adopted, with amendments, the report "Development Application Fee Review" from the Deputy City Manager, Development and Growth (known as the '2024 Review'). Council requested the Executive Director, Development Review 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.
https://secure.toronto.ca/council/agenda-item.do?item=2025.PH21.3

COMMENTS

In February 2025, staff kicked off a year long Lean Six Sigma evaluation of the City's existing Site Plan application review process (the Site Plan Process Review). The Site Plan Process Review was informed by emerging strategic priorities in support of an improved development review service, changes to the City's as-of-right planning framework, and significant ongoing legislative change. Ongoing input from frontline staff was critical as they continue to improve service delivery in their day-to-day work.

Site Plan Application Fee Review

The 2024 Review represents a comprehensive review of the City's development application fees. The report includes an overview of the City's legislated authority to collect development application fees under subsection 69(1) of the *Planning Act*, compliance with the City's User Fee Policy (2011.EX10.2), and the Activity Based Costing model the City uses to establish its fee schedule for development applications. Attachment 3 provides an overview of the inputs to the City's cost model. The recommended fee schedule (Attachment 1) was developed following the same methodology, supported by Watson & Associates Economists, as the comprehensive 2024 Review.

The City's cost model, first adopted by Council in 2012, is grounded on the assumption that there is a direct relationship between the size of an application and the level of staff effort required to process it, to a point of diminishing return. The Site Plan application fee review revisits this assumption through updated analysis of two key variables of the City's current cost model - application volume and staff level of effort. Both variables are impacted by ongoing fluctuations in the economic factors (e.g., fluctuating interest rates, increasing labour and supply costs) that affect development activity in the city, updated planning frameworks (i.e., provincial legislation and regulation, City-initiated as-of-right zoning frameworks), and Site Plan application streaming. An analysis of these two key variables is detailed below.

Annual Average Application Volume

The 2024 Review relied on a five-year average of annual development application volumes calculated using 2017-2020 and 2023 data. Application volumes for the years 2021 and 2022 were excluded from the five-year average as they represent much higher-than-average volumes. The City's in-force fee schedule is rationalized on an average of 460 development applications annually (total for all application types). This includes an average of 182 Site Plan Control applications and 10 Site Plan Amendment applications annually.

A review of application volume data from 2023, 2024 and 2025 revealed a downward trend in volume compared to the five-year average of the 2024 Review. This is due to a mix of economic factors and the changing planning framework, particularly the provincial legislative context (e.g., Site Plan Control exemptions introduced under Bill 23 and expanded by the City). In 2024, primarily due to macroeconomic factors, Site Plan application volumes were unusually low. Similar to the approach to exclude anomalous 2021 and 2022 volumes in the 2024 Review, 2024 volumes were excluded from the Site Plan application fee review analysis as they were atypically low.

To address the changing context, the Site Plan application fee review is based on average application volume data from 2023 and 2025. These two years represent a stable picture of the current trend. This approach results in an anticipated average of approximately 143 Site Plan Control applications and 10 Site Plan Amendment applications annually. Compared to the 2024 Review, this represents a decrease of approximately 39 (21%) Site Plan Control applications per year and status quo volume for Site Plan Amendment applications. Application volumes will be re-assessed through the next comprehensive Development Application Fee Review, scheduled to begin in 2028.

Application Volume Segmentation

The in-force fee schedule generally assumes application volume can be segmented by size (i.e., total gross floor area or GFA, measured in square metres), across five categories: under 5,000 square metres, 5,000-16,000 square metres, 16,000-50,000 square metres, 50,000-100,000 square metres, and over 100,000 square metres. As noted above, while variation in practice exists, the City's in-force fee schedule assumes a "typical average" application by size category.

However, all Site Plan applications, regardless of size, currently follow a common review process. While there is some variation in application requirements, circulation to commenting partners, scope of review, the nature of comments and conditions, and district-based approaches, the average level of staff effort and cost of processing is similar across the full range of application types and sizes.

Consultation with internal and external stakeholders, in conjunction with jurisdictional research undertaken for the 2024 Review and the benchmarking exercise described below and in Attachment 4, highlights that application size alone is not the only measure of the level of staff effort required to process an application. These findings point to the need to consider other criteria when determining the level of staff effort required to process an application, including but not limited to, planning framework conformity, development typology, specific site conditions or "land triggers" and their resulting conditions, or whether staff have recently reviewed and made recommendations on an associated Zoning By-law Amendment application.

To establish a new fee schedule in support of a streamed service, staff analyzed a one-year sample of Site Plan application volume from 2025. First, data was segmented by the five size categories identified above. Then the criteria noted above were applied. This approach revealed that the drivers of staff effort appeared across all size categories, confirming the need for multiple criteria for assessing staff level of effort and defining streams. Note that this approach redistributes current (i.e., 2025) Site Plan application volume from the City's existing service to new streams (as described in Attachment 2). It is not predictive of how application volume may change over time. The results of the volume segmentation analysis are shown below in Table 2. Note that Voluntary Application volume is included for context only and is not included in the total volume of Site Plan applications for which the City has statutory authority to approve.

Table 2 - Application Volume Segmentation

Stream	**Application Volume Segmentation**
Voluntary Applications	1-2 applications/year*
Limited Applications	5% of application volume
Minor Applications	30% of application volume
Standard Applications	65% of application volume

*Included for context only. Volume not included in the total volume of Site Plan applications for which the City has statutory authority to approve.

Level of Effort Estimates

The 2024 Review was supported by robust staff level of effort estimates resulting from 45 staff workshops to update application review process maps, a comprehensive survey of over 460 City staff from 15 divisions, and multiple rounds of management team validation. This input represents the Council-adopted baseline for the Site Plan Process Review.

To appropriately distribute staff effort to new application streams, staff, supported by Watson & Associates Economists, assumed the 2024 Review baseline generally represents Standard Applications. A 5% decrease in staff level of effort was applied to the Standard Application stream to reflect process and technology improvements that have been implemented since the 2024 Review.

Minor Applications are characterized as scoped, requiring limited circulation, with few or no complex matters to be addressed through standard conditions. Circulation to and review by commenting partners represents most of the City's cost of processing. When circulation is limited, cost of processing decreases.

In developing the recommended fee schedule, staff tested a number of scenarios for Minor Applications and recommend an approach that concentrates staff level of effort within core team commenting partners, removes or scopes the review of commenting partners who do not have direct accountability for application requirements, and emphasizes the use of standard conditions. Taking this approach, the Minor Application stream represents a 35% decrease in staff level of effort compared to the 2024 Review baseline. Further to this approach, as-of-right applications within the Minor Applications stream require reduced staff level of effort due to limited variation in gross floor area within Major Streets (i.e., up to six-storey, 60-unit) and Avenues (i.e., up to 1:1 height to right-of-way ratio) zoning frameworks.

The Voluntary Application stream has a similar level of effort profile to as-of-right applications within the Minor Applications stream as these types of applications focus on technical review for a limited number of application requirements.

The Limited Application stream generally removes all staff effort for review except that of the Community Planner. Limited applications do not require "value added" review from circulations to commenting partners and can typically be approved directly under the delegated authority of the appropriate Director, Community Planning. Limited Applications benefit from a narrowly scoped pre-application consultation process and submission of a limited set of application requirements. Over the past two years, the City has taken a similar approach to routine Draft Plan of Condominium applications, removing all circulation beyond the Community Planner. This results in significant time and cost savings for applicants. The recommended fee schedule assumes a 96% reduction in staff level of effort for Limited Applications.

Staff Resource Utilization and Divisional Revenue Allocation

As described above, the 2024 Review serves as the Council-adopted baseline for the Site Plan Process Review. This includes underlying assumptions related to annual staff resource utilization (measured as full-time equivalents (FTE)), as shown in Table 3. The 2024 Review maintained status quo divisional effort and development application fee revenue allocations despite significant organizational structure change over the course of the Review.

Through the 2026 Budget process, development application fee revenue allocations were adjusted to reflect new organizational structures. This includes, for example, the establishment of the Development Review Division and the "lift and shift" of teams from City Planning, Engineering and Construction Services, Transportation Services, Parks and Recreation, and the former C2K program into Development Review.
Streaming the Site Plan review process impacts staff resource utilization across divisions engaged in development review services. Should Council adopt the recommended fee schedule, development application fee revenue allocations will remain proportional to divisional effort as shown in Table 3, below; however, overall divisional effort for providing Site Plan review services will decrease.

Table 3 - 2024 Review Staff Resource Utilization by Division (Site Plan Application Processing Only)

Division	Staff Resource Utilization* (2024 Review)	Proportion of Total Staff Resource Utilization* (2024 Review)
Development Review	109.6	53.8%
City Planning	37.7	18.5%
Toronto Water	18.8	9.2%
Environment, Climate and Forestry	11.5	5.6%
Legal Services	5.8	2.8%
Toronto Building	4.7	2.3%
Engineering and Construction Services	4.7	2.3%
All Other	10.9	5.3%
TOTAL	**203.7**	**100%**

*Staff resource utilization as measured in full-time equivalents (FTE).

The recommended fee schedule reflects a decrease in staff time required to process applications. Currently, Site Plan application processing requires varying degrees of effort. This report does not propose any immediate staffing changes. Complement management planning will continue through the 2027 and 2028 Budget process.

Recommended Fee Schedule

The City's recommended fee schedule supports streamed services. Each application stream is designed as a discrete service to eliminate cross-subsidization. The recommended fee schedule results in full cost recovery for the Limited Application stream.

The Minor Application stream, with a focus on incentivizing as-of-right application types, recovers approximately 33% of the cost of processing. This is partially due to the introduction of a flat fee for as-of-right types. The intent is to reduce financial constraint and ensure certainty for applicants ahead of the process and technology improvements required to further reduce the City's cost of processing for these applications.

The recommended fee schedule holds Standard Application fees at current rates, resulting in approximately 87% cost recovery for that stream. Further adjustments may be identified either through interim reporting or the comprehensive Development Application Fee Review, scheduled to begin in 2028.

The recommended fee schedule simplifies the City's long-standing "base fee plus variable fee" structure wherever feasible. Table 4 below summarizes the recommended fee schedule and highlights changes in fee structure.

Table 4 - Recommended Fee Structures

Stream	Sub-Type	Current Structure	Recommended Structure
Voluntary		Base Fee Variable Fee (per square metre of GFA) Maximum Charge	Flat Fee
Limited		Base Fee Variable Fee (per square metre of GFA) Maximum Charge	Flat Fee
Minor	As-of-right Types	Base Fee Variable Fee (per square metre of GFA) Maximum Charge	Flat Fee
	Other Minor Types	Base Fee Variable Fee (per square metre of GFA) Maximum Charge	Base Fee Variable Fee (per square metre of GFA) Maximum Charge
Standard		Base Fee Variable Fee (per square metre of GFA) Maximum Charge	Base Fee Variable Fee (per square metre of GFA) Maximum Charge
Site Plan Amendment		Flat Fee	Flat Fee
Site Plan Amendment (Administrative)		Flat Fee	Flat Fee

A simplified fee structure improves transparency and predictability for applicants. The recommended fee schedule results in decreased application fees for Voluntary, Limited and Minor Application streams. The Standard stream remains status quo. Application streaming separates routine applications from complex ones, concentrating staff level of effort on more complex files and supporting faster service delivery. Table 5 outlines changes in application fees as a result of the recommended fee schedule.

Table 5 - Fee Schedule Comparison (Current and Recommended)

Stream	Sub-Type	Current Fee	Recommended Fee	Change in Fee
Voluntary		Base: $43,605.12 GFA: $5.37/square metre Max: $621,372.96	$32,704.00	-25% -100% -100%
Limited		Base: $43,605.12 GFA: $5.37/ square metre Max: $621,372.96	$10,881.00	-75% -100% -100%
Minor	As-of-right Types	Base: $43,605.12 GFA: $5.37/ square metre Max: $621,372.96	$32,704.00	-25% -100% -100%
	Other Minor Types	Base: $43,605.12 GFA: $5.37/ square metre Max: $621,372.96	Base: $32,704 GFA: $4.02 / square metre Max: $310,686	-25% -25% -50%
Standard		Base: $43,605.12 GFA: $5.37/ square metre Max: $621,372.96	Base: $43,605.12 GFA: $5.37/ square metre Max: $621,372.96	No Change
Site Plan Amendment		$52,524.55	$32,704.00	-38%
Site Plan Amendment (Administrative)		$6,540.77	$6,540.77	No Change

Benchmarking

To test the reasonableness of the recommended fee schedule, the City's consultants (Watson & Associates Economists) undertook a comparative analysis of other southern Ontario municipalities (see Attachment 4). The analysis compares both fee structures and the actual dollar value of fees for Site Plan applications.

Several municipalities in southern Ontario offer some form of streamed Site Plan review services, whether by development type, specific type of technical review, or level of staff effort. Most municipal fee schedules continue to employ a base fee structure with additional variable fees for either gross floor area (GFA) or units. Several municipalities have established maximum charges for Site Plan applications.

When compared on the basis of fee structure, the City has significantly simplified fee structures through comprehensive Development Application Fee Reviews completed in 2022 and 2024. The recommended fee schedule further simplifies fee structures, introducing flat fees where appropriate and maintaining the harmonized variable fee structure for residential and non-residential GFA established through the 2024 Review. The recommended fee structure includes differentiated maximum charges for Minor and Standard Applications.

When compared on the basis of development application fees alone (by application type), the City has previously ranked in the top five most expensive southern Ontario municipalities. Comparing the recommended fee schedule to other municipalities shows that Toronto is leading the effort to incentivize mid-rise development by reducing fees for proposals that conform to as-of-right zoning frameworks (see Table 6).

Table 6 - Comparison of Municipal Site Plan Application Fees for a Six-storey, 60-unit Mid-rise Development

Municipality	**Site Plan Application Fee for a Six-storey, 60-unit Mid-rise Development***
Brampton	$91,842
Oakville	$81,976
Ottawa	$76,223
Markham	$75,814
Toronto (Current In-force Fee Schedule)	**$74,364**
Hamilton	$64,355
Mississauga	$61,182
Pickering	$59,287
Vaughan	$51,810
Richmond Hill	$44,778
Whitby	$43,025
Burlington	$37,950
Toronto (Recommended Fee Schedule)	**$32,704**

*Note that this development type reflects the City's as-of-right zoning framework for Major Streets and may not be typical of mid-rise development proposals in other municipalities.

As noted in the 2024 Review, municipal benchmarking 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. Ongoing legislative change continues to impact Toronto in distinct ways compared to other Ontario municipalities due to the order of magnitude difference in application volume, staff complement, and annual application fee revenue. Additionally, complexity of review is associated with some development typologies more than others. While the benchmarking exercise illustrated in Attachment 4 compares how municipal fee schedules apply to several typologies, not all municipalities receive development proposals of the same scale and complexity as Toronto.

Consultation and Stakeholder Feedback

Building on stakeholder consultation in support of the 2024 Review, staff continued to engage with industry organizations, post-secondary institutions, and individual applicants through the Site Plan Process Review. Staff also provided regular updates to and received input from the Development Review Stakeholder Reference Group, which includes broader representation from a range of housing providers. Stakeholder feedback falls into three general categories:

Fit-for-purpose service delivery: many stakeholders encouraged staff to develop and implement distinct Site Plan application streams. Staff heard that better aligning staff effort to differentiated streams could enable more focused service delivery and help reduce both processing delays and application fees.

Timely decision-making: stakeholders commented on the need to identify and address critical issues early in the review process and advance decisions through a consistent, predictable steps (e.g., escalation meetings) instead of through multiple application resubmissions and circulations.

Cost-effectiveness: the City has received consistent feedback from stakeholders regarding reducing application fees generally, and specifically for applications that require lower staff effort for review. Through City Planning's ongoing consultation on the Mid-Rise Housing Implementation Initiative, staff received feedback on fee structures that could better support mid-rise types within the City's existing as-of-right zoning frameworks. For applications that require higher levels of staff effort, stakeholders noted that fees should align with improved service delivery.

Next Steps for Implementation

This report concludes Phase 1 of the Site Plan Process Review. Phase 2 will run from June 2026 to January 2027 and includes further refinement of streamed Site Plan review services to test practice changes and develop standardized approaches to application requirements, conditions, secured plans, and agreements. Additionally, development of technology platforms, including the Application Submission Tool (AST) and the City's Integrated Business Management System (IBMS) is required to implement the changes to application intake and fee management processes resulting from this report.

Beginning in January 2027, staff will formally pilot streamed service delivery as the recommended fee schedule comes into effect. Phase 3 work will focus on continuous process improvement and significant development of technology platforms in alignment with the City's multi-year transformation of IBMS through the Community Development, Regulatory and Licensing (CDRL) initiative.

The outcomes of work completed in Phase 2 may be reflected through interim reporting, as needed. Phase 3 outcomes will be reflected in the City's next comprehensive Development Application Fee Review, scheduled to begin in 2028.

Repeal of Official Plan Amendment 688

In October 2023, Council adopted Official Plan Amendment (OPA) 688 to add a new requirement for in-effect zoning compliance as part of a complete Site Plan Control application to Schedule 3 of the Official Plan. This requirement was intended to enforce sequential consideration and scoped review of Zoning By-law Amendment and Site Plan Control application types and to support management of legislated timelines for decision. OPA 688 was appealed to the Ontario Land Tribunal in November 2023 and remains before the Tribunal.

Through the Site Plan Process Review, staff identified an opportunity to manage the scope of review of "concurrent" Site Plan Control applications in practice rather than by a requirement of a complete application as established under OPA 688. Generally, as noted above in the overview of Minor Applications and Standard Applications, if a Site Plan application is submitted following a rezoning process and has two or fewer land triggers, it does not require as much staff effort for review and can be processed through the Minor Applications stream. In cases where a rezoning process has concluded and the Site Plan includes three or more land triggers, the application can be processed through the Standard Application stream. If an applicant submits a Site Plan application concurrently with an OPA/ZBA or ZBA application, a practice that continues to be discouraged by the City, it will be processed as a Standard Application.

Staff recommend City Council repeal City of Toronto By-law 946-2023 respecting OPA 688 upon the recommended fee schedule coming into effect.

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SIGNATURE

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ATTACHMENTS

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

Attachment 2: Site Plan Application Streams

Attachment 3: Summary of Inputs to the City's Cost Model (Direct, Indirect and Capital Costs)

Attachment 4: Municipal Benchmarking

Attachment 5: City of Toronto comments in response to the Province's proposal to reform site plan control under the Planning Act and City of Toronto Act, 2006 (ERO No. 026-0310)