

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

**TORONTO MUNICIPAL CODE
CHAPTER 441, FEES AND CHARGES**

Appendix C - Schedule 13, City Planning, Development Review

	I	II	III	IV	V	VI
Ref. No.	Service	Fee Description	Category	Fee Basis	Fee	Annual Adj.
1	Development Review, Decision and Implementation	Application fee for Official Plan Amendment	Full Cost Recovery	Per application	\$232,602.79	Yes
2	Development Review, Decision and Implementation	Base fee for Zoning By-law Amendment	Full Cost Recovery	Base Fee	\$63,679.83	Yes
3	Development Review, Decision and Implementation	Additional fee for Zoning By-law Amendment (residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$6.23	Yes
3.1	Development Review, Decision and Implementation	Additional fee for Zoning By-law Amendment (non-residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$6.23	Yes
3.7	Development Review, Decision and Implementation	Maximum charge for a Zoning By-law Amendment	Full Cost Recovery	Per application	\$779,441.52	Yes
4	Development Review, Decision and Implementation	Application fee for Holding By-law Amendment	Full Cost Recovery	Per application	\$51,255.18	Yes
5	Development Review, Decision and Implementation	Application fee for Plan of Subdivision Approval	Full Cost Recovery	Each Plan	\$289,479.13	Yes
9	Development Review, Decision and Implementation	Base fee for Part Lot Exemption	Full Cost Recovery	Per application	\$22,129.60	Yes
10	Development Review, Decision and Implementation	Additional fee for each proposed lot for Part Lot Exemption	Full Cost Recovery	Per \$/each proposed lot	\$1,442.24	Yes

15	Development Review, Decision and Implementation	Application fee for Minor Variance for additions and alterations to existing dwellings with three units or less	Full Cost Recovery	Per application	\$2,228.98	Yes
16	Development Review, Decision and Implementation	Application fee for Minor Variance for additions and alterations to existing dwellings three units or less: With OTC (Order to Comply)	Full Cost Recovery	Per application	\$4,457.96	Yes
17	Development Review, Decision and Implementation	Application fee for Minor Variance for residential dwellings with three units or less	Full Cost Recovery	Per application	\$5,011.08	Yes
18	Development Review, Decision and Implementation	Application fee for Minor Variance for residential dwellings with three units or less: With OTC (Order to Comply)	Full Cost Recovery	Per application	\$10,022.16	Yes
19	Development Review, Decision and Implementation	Application fee for minor variance for all other residential, commercial, industrial or institutional uses	Full Cost Recovery	Per application	\$6,485.59	Yes
20	Development Review, Decision and Implementation	Application fee for minor variance for all other residential, commercial, industrial or institutional uses: With OTC (Order to Comply)	Full Cost Recovery	Per application	\$12,971.18	Yes
21	Development Review, Decision and Implementation	Base fee for Consent to sever one lot into two, or establishing a new easement	Full Cost Recovery	Base Fee per Application	\$8,080.65	Yes
22	Development Review, Decision and Implementation	Additional fee for each additional lot created for Consent	Full Cost Recovery	Per lot	\$6,561.48	Yes
23	Development Review, Decision and Implementation	Application fee for Validation of Title, Technical Severance, Leases, Mortgage Discharge, or Lot Additions	Full Cost Recovery	Per application	\$2,275.91	Yes

24	Development Review, Decision and Implementation	Committee of Adjustment Historic Decision Research Request - 500m radius	City Policy	Per Request	\$150.00	No
24.2	Development Review, Decision and Implementation	Committee of Adjustment Historic Decision Research Request - 1000m radius	City Policy	Per Request	\$300.00	No
25	City Building and Policy Development	Administrative costs of reviewing applications under the Heritage Tax Rebate Program	City Policy	Per application	\$100.00	No
26	City Building and Policy Development	Administrative costs of reviewing applications under the Heritage Tax Rebate Program - Non-residential property with total current value assessment less than \$2,500,000.00	City Policy	Per application	\$250.00	No
27	City Building and Policy Development	Administrative costs of reviewing applications under the Heritage Tax Rebate Program - Non-residential property with total current value assessment greater than or equal to \$2,500,000.00 and less than \$10,000,000.00	City Policy	Per application	\$500.00	No
28	City Building and Policy Development	Administrative costs of reviewing applications under the Heritage Tax Rebate Program - Non-residential property with total current value assessment greater than or equal to \$10,000,000.00	City Policy	Per application	\$1,500.00	No
29	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Demolition	Full Cost Recovery	Base Fee per Application	\$6,227.90	Yes
30	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Demolition	Full Cost Recovery	Per unit	\$249.64	Yes
31	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Demolition, Delegated Approval	Full Cost Recovery	Base Fee per Application	\$1,246.02	Yes

32	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Demolition, Delegated Approval	Full Cost Recovery	Per unit	\$62.14	Yes
33	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Conversion to Condominium	Full Cost Recovery	Base Fee per Application	\$3,736.96	Yes
34	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Conversion to Condominium	Full Cost Recovery	Per unit	\$62.14	Yes
35	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Conversion to Condominium, Delegated Approval	Full Cost Recovery	Base Fee	\$1,246.02	Yes
36	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Conversion to Condominium, Delegated Approval	Full Cost Recovery	Per unit	\$62.14	Yes
37	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Conversion to Freehold	Full Cost Recovery	Base Fee per Application	\$3,736.96	Yes
38	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Conversion to Freehold	Full Cost Recovery	Per \$/unit	\$62.14	Yes
39	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Conversion to Freehold, Delegated Approval	Full Cost Recovery	Base Fee	\$1,246.02	Yes
40	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Conversion to Freehold, Delegated Approval	Full Cost Recovery	Per \$/unit	\$62.14	Yes

41	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Conversion to Co-ownership or Life Lease	Full Cost Recovery	Base Fee per Application	\$14,947.84	Yes
42	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Conversion to Co-ownership or Life Lease	Full Cost Recovery	Per \$/unit	\$62.14	Yes
43	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Conversion to Co-ownership or Life Lease, Delegated Approval	Full Cost Recovery	Base Fee per Application	\$1,246.02	Yes
44	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Conversion to Co-ownership or Life Lease, Delegated Approval	Full Cost Recovery	Per \$/unit	\$62.14	Yes
45	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Other Consents	Full Cost Recovery	Base Fee	\$3,736.96	Yes
46	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Other Consents	Full Cost Recovery	Per \$/unit	\$62.14	Yes
47	Development Review, Decision and Implementation	Base fee for Rental Housing Demolition and Conversion - Other Consents, Delegated Approval	Full Cost Recovery	Base Fee per Application	\$1,246.02	Yes
48	Development Review, Decision and Implementation	Additional fee per unit for Rental Housing Demolition and Conversion - Other Consents, Delegated Approval	Full Cost Recovery	Per \$/unit	\$62.14	Yes
49	City Building and Policy Development	Expert Research Services	City Policy	Per Hour	\$135.00	No

51	City Building and Policy Development	Requests for formal confirmation re: property listed, designated or being considered re: OHA	City Policy	Per Request	\$60.00	No
52	City Building and Policy Development	Compliance regarding Heritage Easement Agreements and Section 37 Agreements	City Policy	Per Request	\$60.00	No
53	Development Review, Decision and Implementation	Application fee for Telecommunication Tower	Full Cost Recovery	Base Fee	\$6,534.23	Yes
54	Development Review, Decision and Implementation	Legal services processing for Section 37 agreement	Full Cost Recovery	Per application	\$18,266.27	Yes
55	Development Review, Decision and Implementation	Base fee for Combined Official Plan and Zoning By-law Amendment	Full Cost Recovery	Base Fee	\$76,251.18	Yes
55.1	Development Review, Decision and Implementation	Additional fee for Combined Official Plan and Zoning By-law Amendment (residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$6.23	Yes
55.2	Development Review, Decision and Implementation	Additional fee for Combined Official Plan and Zoning By-law Amendment (non-residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$6.23	Yes
62.5	Development Review, Decision and Implementation	Maximum charge for a Combined Official Plan and Zoning By-law Amendment application	Full Cost Recovery	Per application	\$872,102.40	Yes
67	Development Review, Decision and Implementation	Pre-Application Consultation meeting non-refundable deposit against future application fee (OPA, ZBA, SB, SA)	Full Cost Recovery	Per application	\$3,000.00	Yes
68	Development Review, Decision and Implementation	Application fee for consent to sever multiple lot additions for the creation of one or more new lots (per existing lot)	Full Cost Recovery	Per application	\$4,040.33	Yes

69	Development Review, Decision and Implementation	Application fee for Routine Plan of Condominium Approval - Standard	Full Cost Recovery	Per application	\$12,619.32	Yes
70	Development Review, Decision and Implementation	Application fee for Technical Plan of Condominium Approval - Standard	Full Cost Recovery	Per application	\$30,324.09	Yes
71	Development Review, Decision and Implementation	Application fee for Routine Plan of Condominium Approval - Common Elements	Full Cost Recovery	Per application	\$12,619.32	Yes
72	Development Review, Decision and Implementation	Application fee for Technical Plan of Condominium Approval - Common Elements	Full Cost Recovery	Per application	\$30,324.09	Yes
73	Development Review, Decision and Implementation	Application fee for Technical Plan of Condominium Approval - Phased	Full Cost Recovery	Per application	\$30,324.09	Yes
74	Development Review, Decision and Implementation	Application fee for Technical Plan of Condominium Approval - Leasehold	Full Cost Recovery	Per application	\$30,324.09	Yes
75	Development Review, Decision and Implementation	Application fee for Technical Plan of Condominium Approval - Vacant Land	Full Cost Recovery	Per application	\$30,324.09	Yes
76	Development Review, Decision and Implementation	Application fee for Technical Plan of Condominium Approval - Rental Conversion	Full Cost Recovery	Per application	\$30,324.09	Yes
77	Development Review, Decision and Implementation	Application fee for an amendment to Plan of Condominium Approval	Full Cost Recovery	Per application	\$10,006.28	Yes
78	Development Review, Decision and Implementation	Application fee for an exemption to Plan of Condominium Approval	Full Cost Recovery	Per application	\$6,540.77	Yes
80	Development Review, Decision and Implementation	Base fee for standard Site Plan Control (approval of plans and drawings under Section 114 of the City of Toronto Act)	Full Cost Recovery	Base Fee	\$43,605.12	Yes

80.1	Development Review, Decision and Implementation	Additional fee for standard Site Plan Control (residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$5.37	Yes
80.2	Development Review, Decision and Implementation	Additional fee for standard Site Plan Control (non-residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$5.37	Yes
80.3	Development Review, Decision and Implementation	Maximum charge for residential standard Site Plan Control	Full Cost Recovery	Per application	\$621,372.96	Yes
80.4	Development Review, Decision and Implementation	Maximum charge for non-residential standard Site Plan Control	Full Cost Recovery	Per application	\$621,372.96	Yes
81	Development Review, Decision and Implementation	Base fee for minor Site Plan Control	Full Cost Recovery	Base Fee	\$32,704.00	Yes
81.1	Development Review, Decision and Implementation	Additional fee for minor Site Plan Control (residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$4.02	Yes
81.2	Development Review, Decision and Implementation	Additional fee for minor Site Plan Control (non-residential gross floor area)	Full Cost Recovery	Per \$/sq. m	\$4.02	Yes
81.3	Development Review, Decision and Implementation	Maximum charge for residential minor Site Plan Control	Full Cost Recovery	Per application	\$310,686.00	Yes
81.4	Development Review, Decision and Implementation	Maximum charge for non-residential minor Site Plan Control	Full Cost Recovery	Per application	\$310,686.00	Yes
82	Development Review, Decision and Implementation	Application fee for limited Site Plan Control	Full Cost Recovery	Per application	\$10,881.00	Yes
83	Development Review, Decision and Implementation	Application fee for voluntary Site Plan Control	Full Cost Recovery	Per application	\$32,704.00	Yes
84	Development Review, Decision and Implementation	Application fee for an amendment to Site Plan Control	Full Cost Recovery	Per application	\$32,704.00	Yes
84.1	Development Review, Decision and Implementation	Application fee for an administrative amendment to Site Plan Control	Full Cost Recovery	Per application	\$6,540.77	Yes

Attachment 2 - Site Plan Application Streams

Site Plan Application Streams

The recommended fee schedule reflects a streamed Site Plan review process, described below.

Pre-Application Consultation: Pre-application Consultation (PAC) is a voluntary step in the application review process. The City strongly encourages all applicants to participate in a PAC meeting with staff to scope application requirements and discuss issues and opportunities. The PAC meeting will continue to be a critical step in the development review process once streamed services are available. Pre-application consultation supports accurate scoping of applications, ensuring only necessary application requirements are identified and issues that might result in increased staff level of effort for review are addressed early.

Voluntary Applications: Bill 185: *Cutting Red Tape to Build More Homes Act, 2024*, enacted section 62.0.2 of the *Planning Act*, exempting publicly-assisted post-secondary institutions from Site Plan Control. Through ongoing consultation, post-secondary institutions have noted that they continue to see value in aspects of the City's Site Plan review process. The Voluntary Application stream enables post-secondary institutions to submit a voluntary application for a flat fee and allows for a scoped circulation and review of a limited number of technical matters. The review concludes with issuance of a Notice of Review (NOR), the City's non-statutory comment document provided at the end of the review process instead of a Notice of Approval Conditions and Statement of Approval.

Limited Applications: In some cases, development proposals are subject to Site Plan Control but do not require circulation or "value-added" review. These applications may be submitted by a private applicant, but many come from City Divisions or Agencies, Boards and Commissions for development proposals on City-owned land (e.g., Parks and Recreation, Toronto Water, TTC). Replicating the approach Development Review implemented in 2025 for routine Draft Plan of Condominium applications, staff will develop a set of standard conditions that can be applied to ensure the City's interests are met through the development process. This approach removes the need for circulation, generally limiting the review to the Community Planner.

Minor Applications: This stream enables streamlined review of two types of applications. The first are those that conform to the City's as-of-right zoning frameworks for Major Streets and Avenues. Applications that meet the intent of Major Streets or Avenues policies but require variances must receive approval from the Committee of Adjustment prior to Site Plan application submission. The second are applications that have concluded the rezoning process prior to submission and/or have a limited set of "land triggers" that require circulation to commenting partners (see Table 2 for examples). This second type of application is not necessarily limited by size (i.e., gross floor area or GFA), rather by the level of staff effort required to review application requirements, identify standard solutions that address specific "land triggers," and apply appropriate standard conditions.

Standard Applications: Most Site Plan applications will continue to require circulation to and review by a broader range of commenting partners based on a larger set of "land triggers" and other matters that may require complex review and unique solutions. In cases where a Site Plan application is submitted concurrently with a combined Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) or standalone ZBA application, it will be considered a Standard Application.

Table 1 - Site Plan Application Streams

Stream	Description	Criteria	Example
Voluntary Applications	Applications that are exempt from or have limitations on Site Plan approval under Section 62 of the <i>Planning Act</i> .	Voluntary review of limited and specific technical matters (e.g., site servicing). A Notice of Review is issued in lieu of an Approval.	Development proposals voluntarily submitted by post-secondary institutions for a new student residence.
Limited Applications	Applications that qualify as development but do not require circulation or "value-added" review.	Requires only Community Planning review (i.e., no circulation). No conditions or requires only standard, simplified conditions.	A development proposal for a small, un-serviced storage shed in a TTC yard.
Minor Applications	Applications that implement as-of-right zoning permissions on Major Streets or Avenues.	Conforms to as-of-right zoning permissions or has received Minor Variance approval from the Committee of Adjustment prior to submission.	A residential development proposal on a Major Street that falls within the six-storey, 60 unit as-of-right zoning framework. A mixed-use development proposal on an Avenue that achieves a 1:1 height to right-of-way ratio.
	Applications with a limited circulation that do not require a higher level of staff effort for review.	Applications that have completed a rezoning process and/or have two or fewer "land triggers."*	An industrial warehouse proposal requiring a road widening.

Stream	Description	Criteria	Example
Standard Applications	Applications with a broader circulation that require a higher level of staff effort for review. Unique solutions may be needed.	Applications that are submitted concurrently with an OPA/ZBA or ZBA application and/or have three or more "land triggers."	A multi-building development in proximity to a ravine, with a heritage designation, and requiring a road widening.

Land Triggers

Each development site has a unique set of physical characteristics or "land triggers." Table 2 below describes common land triggers and identifies information and materials that may be required as part of a complete application to address each trigger. Each land trigger generally requires the addition of an expert commenting partner(s) to the circulation, review and commenting process. In some cases, a Peer Review of a study or report may be required. Generally, each land trigger increases the scope of application review. The list included in Table 2 is not exhaustive, and staff will retain discretion within the boundaries of the *Planning Act*, the *City of Toronto Act, 2006*, and the City of Toronto Official Plan.

Table 2 - Land Trigger Examples

Land Trigger	Description	Complete Application Requirements (may be required)
Public Infrastructure	Proximity to existing sewer, stormwater management or other easements in favour of the City.	None
Rail Corridors	Property located within 30 metres of a rail corridor.	• Rail Safety and Risk Mitigation Report • Noise Impact Study • Vibration Study
Provincial Highway	Property located within the Ministry of Transportation's Control Area .	• Noise Impact Study

Land Trigger	Description	Complete Application Requirements (may be required)
Toronto Transit Commission	Property located within direct proximity of TTC infrastructure, either below grade (subway infrastructure) or above grade (TTC lands, bus stops, etc.)	• Noise Impact Study • Vibration Study
Road Widening	Property is subject to a land dedication to the City for purposes of widening the public right-of-way, as described in policies 2.2.5 and 2.2.7 of the Official Plan.	• Draft Reference Plan • Environmental Site Assessment (requires Peer Review) • Record of Site Condition and/or Letter of Acknowledgement (Requires Peer Review)
Methane Gas Risk	Property is located in proximity to a former landfill site.	• Methane Gas Study
Sensitive Use near Employment Lands	Proposed development is either a new or expanded employment use within 300 metres of sensitive land uses or is a new or expanded sensitive land use within 300 metres of an existing employment use.	• Compatibility/Mitigation Study, and/or ○ Noise Impact Study ○ Vibration Study ○ Air Quality Study ○ Odour Study
Archaeological Potential	Property is located either within an area of archaeological potential or archaeological sensitivity.	• Archaeological Assessment
Built Heritage	Proposed development has potential to impact heritage assets located on or adjacent to subject lands, including those that are designated under the Heritage Act, on the City's Inventory as Listed or Registered.	• Heritage Impact Assessment • Heritage Permit

Land Trigger	Description	Complete Application Requirements (may be required)
Rental Replacement	Proposal seeks to demolish six or more existing residential rental units, requiring also a Rental Housing Demolition and Conversion Application.	A Section 111 Agreement may be required through the approval process per Chapter 667 of the Toronto Municipal Code.
Existing Public or Private Trees	Existing City-owned trees or private trees on the subject lands or in proximity to the development, protected under Chapter 813 of the Municipal Code , may be injured/removed to facilitate the development.	• Arborist Report • Tree Protection Plan
Natural Ravine/Toronto Region Conservation Authority (TRCA), Endangered Species	Property is located within lands regulated by the TRCA, or within the City's Natural Heritage System as shown on Maps 9A to Map 9C of the Official Plan. Proposal may be located near habitat for an endangered species.	• Arborist Report • Tree Protection Plan • Natural Heritage Impact Study • Environmental Impact Study • Lighting Plan • A permit from the TRCA may be required through the approval process.

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

Direct Costs:

- Salaries (salaries and benefits, including overtime)
- Materials and supplies, e.g. maintenance items, office supplies, utilities etc.
- Equipment, e.g. furniture, machinery, replacement parts, etc.
- Services and rents, e.g. insurance, contracted services, rental charges, etc.
- Interdivisional charges (e.g. expenses for use or consumption of goods or services provided by centralized support divisions)
- Other expenditures, e.g. bank service charges, interest charges etc.

Indirect Costs:

1. Program Support Costs:
 - a. Internal Program Support includes direct support business units contained within divisions or within a Service Area (e.g., Policy, Payroll, Finance & Administration) that provide services to that division.
 - b. External Program Support includes support at the Corporate level such as Purchasing & Materials Management, Pension, Payroll & Employee Benefits, Technology Services, People & Equity, etc.
2. Corporate Managed Items:
 - a. Program Related Expenditures Funded by Reserve Funds such as: Retiree benefits, WSIB, sick leave benefits, Long Term Disability benefits, and insurance expenditures.
 - b. Operating Expenditures Recorded in Capital Budget include program expenditures budgeted and recorded in capital funding's General Ledger which do not meet the Public Sector Accounting Board Tangible Capital Assets requirements. They are considered operating, and re-classed to operating costs.

Capital Costs:

Capital costs in the form of amortization costs of capital assets were updated with data from Corporate Accounting for appropriate divisional facilities and facilities occupied by other business units involved in processing development applications.

Attachment 4 – Municipal Benchmarking

Table 1: Comparison of Municipal Site Plan Application Fees for a Mid-rise Development

Mid-rise development on a Major Street. Six storeys, 60 units, 4,588 m² of residential GFA, and 1,140 m² of non-residential GFA.

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

Table 2: Comparison of Municipal Site Plan Application Fees for a “Tall Mid-rise” Development

Mid-rise development taller than the 1:1 building height to right-of-way width ratio. 291 units, 16,770 m² of residential GFA, and 151 m² of non-residential GFA.

Municipality	Site Plan Application Fee for a 291-unit “Tall Mid-rise” Development
Markham	\$235,163
Toronto (Current In-force Fee Schedule)	\$134,469
Pickering	\$122,424
Oakville	\$116,340
Toronto (Recommended Fee Schedule)	\$113,246
Brampton	\$91,842
Burlington	\$91,098
Ottawa	\$80,223
Whitby	\$78,594
Vaughan	\$73,038
Hamilton	\$67,865
Mississauga	\$65,042
Richmond Hill	\$49,154

Table 3: Comparison of Municipal Site Plan Application Fees for a Multi-tower Development on Transit

Multi-tower development with 606 units, 42,274 m² of residential GFA, and 3,492 m² of non-residential GFA.

Municipality	Site Plan Application Fee for a Multi-tower Development on Transit
Markham	\$461,415
Toronto (Recommended Fee Schedule)	\$334,219
Toronto (Current In-force Fee Schedule)	\$289,369
Oakville	\$198,146
Burlington	\$168,750
Pickering	\$160,341
Vaughan	\$131,127
Mississauga	\$118,971
Hamilton	\$101,275
Brampton	\$91,842
Ottawa	\$85,223
Whitby	\$81,670
Richmond Hill	\$49,154

Table 4: Comparison of Municipal Site Plan Application Fees for a Large Site Development

Mall site redevelopment, 4,372 units, 334,630.9 m² of residential GFA, and 36,694.8 m² of non-residential GFA.

Municipality	Site Plan Application Fee for a Large Site Development
Oakville	\$1,095,019
Markham	\$642,794
Toronto (Current In-force Fee Schedule)	\$621,373 (maximum fee)
Toronto (Recommended Fee Schedule)	\$621,373 (maximum fee)
Pickering	\$591,182
Hamilton	\$433,303
Burlington	\$277,400
Mississauga	\$158,361
Vaughan	\$131,127
Brampton	\$91,842
Ottawa	\$85,223
Whitby	\$81,670
Richmond Hill	\$49,154

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)



Oren Tamir
Interim Executive Director
Development Review
Tel: 416-392-7349
Oren.Tamir@toronto.ca

City Hall,
100 Queen Street West, 12th Floor,
East Tower
Toronto, Ontario M5H 2N2

May 14, 2026

Ministry of Municipal Affairs and Housing
Provincial Planning Branch
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3
PlanningConsultation@ontario.ca

RE: Proposal to reform site plan control under the Planning Act and the City of Toronto Act, 2006 (ERO 026-0310)

On behalf of City of Toronto staff, I am pleased to submit our comments and recommendations regarding transformational changes to site plan control.

Summary

Toronto's Development Review Division was established in 2024 with the primary objective of transforming development review processes. In 2025, we made a full overhaul of the site plan review service a top priority. We share the Province's goal of delivering a faster, more predictable, cost-effective, and coordinated process.

We agree that the site plan process has not been working as well as it could. However, Site Plan can be the most effective tool to ensure that health and safety requirements, as well as the functional aspects of a proposed development, are addressed prior to the issuance of a building permit. As one example of its utility, despite being exempted from Site Plan Control, post-secondary institutions and on-campus student housing providers requested the City establish a non-statutory, "voluntary" service to provide technical review.

Our ongoing transformation initiative will fully leverage significant changes made to provincial legislation in recent years, while going further through practice refinements that will have the greatest impact on the stakeholder experience. While we support some additional legislative changes (outlined below), we believe that municipally led initiatives such as ours are key to achieving meaningful and lasting transformation.

Toronto's Site Plan Process Review

Toronto's approach is focused on delivering excellent and effective service to stakeholders while optimizing staff efforts through clear, collaborative, flexible, and data-driven processes and decision-making. In close collaboration with all stakeholders — both internal and external — we are focused on:

Scoping: Reducing application submission requirements and focusing application review and comments on key issues.

Streaming: Grouping applications based on scale and complexity, and ensuring that requirements, review effort, and outputs are proportionate to each stream.

Standardizing: Advancing standardization of plans, comments, conditions, agreements, and related materials to the greatest extent possible.

Staff will be recommending a new fee schedule to support implementation of streamed Site Plan review services for Council consideration in June 2026. Our staff report, which will be publicly available in early June, will include an overview of streamed services and a recommended fee schedule.

This milestone will allow us to launch a fully operational, streamed service—supported by standard operating procedures and templates, a tailored fee schedule, and integrated technology—by early 2027. In parallel with the significant technical work underway across City divisions and with external stakeholders, the Development Review Division is already implementing incremental practice changes to improve the site plan review service.

Recommendations

We recommend that the Ministry of Municipal Affairs and Housing (MMAH) consider the following legislative changes to support the implementation of Toronto's site plan transformation initiative, which will also benefit other municipalities:

1. **Define the purpose of Site Plan Review:** Including a clear and concise statement of purpose in the legislation would help reset expectations and better manage scope creep.
2. **Streaming:** We strongly support a streamed approach to site plan review, with streams defined by municipalities. Toronto is on track to approve new streams in spring 2026, with implementation scheduled for early 2027, and overly prescriptive legislation could disrupt or delay implementation.
3. **Timelines:** If municipalities are required to stream services, consider tailoring legislated timelines to reflect the impracticality of the current timelines for the most complex application stream. We also recommend allowing municipalities and applicants to mutually agree on when to “stop the clock”, which would significantly improve application management and enable municipalities to meet timeline performance indicators without

having to refuse complex applications that need more time. We also recommend amending the lapsing provision to clarify what is considered to be site plan approval for the purposes of the lapsing provision under the Act (i.e., conditional approval is considered approval).

4. **Mitigate municipal risk:** Targeted legislative changes to remove risk with land conveyances, easements and other matters required by, and for, development that municipalities currently secure through site plan agreements and ensure clear legal enforcement without municipalities resorting to public resources through litigation to secure compliance could significantly scope the need for these agreements. City staff would be pleased to work with Ministry staff to explore this further.
5. **Authority to close dormant files:** As of May 2026, at least 20% of the City's site plan application volume is inactive (applicant inactivity), and staff only have delegated authority to approve Site Plan applications. While we make every effort to engage applicants to keep these files moving, if an applicant is no longer actively advancing a proposal, having the authority to close dormant files (similar to the Ontario Land Tribunal) would have a significant impact on application flow-through and overall efficiency of our operations. City staff would also be pleased to work with Ministry staff to explore this further.

We also recommend that the Province support its legislative reforms by updating and promoting its site plan guide and providing technical training. Ensuring that the transformed legislative framework is well understood by all stakeholders is critical to successful implementation, and there are already significant knowledge gaps due to the scale, pace and piecemeal nature of legislative changes in recent years.

Response to Consultation Proposals

The following are our responses to each of the specific proposals the Province is consulting on:

1. "Remove site plan control as a land use planning tool in the *Planning Act* and the *City of Toronto Act, 2006*"

Site plan control remains the most effective and reliable tool to ensure that health and safety requirements, as well as the functional and technical aspects of a proposed development, are addressed in a coordinated and integrated manner before a building permit is issued. It provides a single, comprehensive process through which critical matters—such as servicing, access, landscaping, stormwater management, and conveyances/easements—can be reviewed holistically. Without site plan control, these elements would need to be addressed through multiple, separate processes, significantly increasing the complexity for applicants to navigate and creating inconsistency within and across municipalities.

Fragmenting these reviews would not only add time and cost, but also introduce greater uncertainty and risk, raising the likelihood of unforeseen issues emerging later in the development process and delaying construction. Recent experience following changes to the *Planning Act* through Bill 185 illustrates this point clearly: although post-secondary institutions

and on-campus student housing providers were exempted from site plan approval, they have continued to seek the City's technical review of key matters prior to building permit issuance. This demonstrates the need for integrated, upfront review persists regardless of formal exemptions and reinforces the value of site plan control as an effective regulatory tool.

2. "Require municipalities to have a maximum of three circulations after which a mandatory meeting is triggered with all relevant municipal department representatives and the applicant to work through and resolve all outstanding issues"

We support the intent behind this proposal and, in practice, this is an approach the City is already moving toward—using structured escalation and collaborative meetings to resolve outstanding issues efficiently. However, we strongly believe this is better implemented as a best practice rather than as a legislated requirement. Hard-coding a maximum number of circulations could create unintended consequences by removing necessary flexibility in circumstances where both the municipality and the applicant agree that an additional circulation would be productive and efficient. Preserving discretion allows the process to remain responsive to the complexity of individual applications, enables genuine -problem-solving, and avoids forcing premature meetings or procedural bottlenecks that may not ultimately serve either party or accelerate project delivery.

3. "Further scope the site plan review process to a standard site plan approval checklist of functional aspects of a site (e.g., those related to health and safety), with use of certified professionals for acceptance and approval of reports and studies. A municipality is not permitted to request additional studies and plans beyond what is included in the standard site plan approval checklist. If technical and drawing requirements identified in the checklist are met, site plan approval is issued."

As indicated in the City's submission to the Standing Committee on Heritage, Instructure and Cultural Policy on Bill 98, City staff are not supportive of the removal of sustainable design from the scope of site plan control. We do support the use of a standardized checklist focused on core functional and health-and-safety-related matters. This approach aligns with our direction of implementing differentiated review streams, and we are committed to updating the City's current Standard Application Checklist in close collaboration with stakeholders and Ministry staff to ensure they are practical, clear, and fully aligned with provincial objectives. While we are supportive in principle of a "permit-to-rule" approach for simpler, lower-risk applications—subject to clarity and alignment on the standard checklist—it is critical that municipalities retain the ability to respond to local context, infrastructure capacity, and cumulative impacts. It should also be noted that permit-to-rule would require that many details that are often deferred to the site plan stage would need to be addressed at an earlier stage such as zoning, and this reduced flexibility would likely frustrate many applicants.

We also note that our detailed comments on the use of certified professionals will be provided through a separate submission. As this work advances, our feedback will continue to focus on

avoiding unintended consequences, including the risk of fragmenting technical reviews in a way that increases the likelihood of conflicts, redesigns, or late-stage delays. Equally important, any approach must appropriately manage municipal risk, recognizing that municipalities remain accountable for public safety, infrastructure performance, and long-term outcomes, even where review processes are streamlined.

4. “Establish or require a municipal arbitration process / site plan review panel for site plan applications that have exceeded the government’s 60-day timeline and a specified number of circulations. Participants in this process would include the applicant and the municipal development review team. This would be an alternative to a hearing at the OLT with a goal of speeding up approvals and cutting down on associated costs. An arbitration process / site plan review panel decision-making timeline could be applied to ensure timely decisions on approvals”

While we share the Province’s objective of moving site plan applications through the system more quickly and reducing unnecessary delay, our experience indicates that applications which exceed prescribed timelines most often do so at the request of the applicant—either to pause the process or to make substantive changes in direction as issues are worked through. With the range of process improvements already being advanced, an additional arbitration or review panel is neither necessary nor aligned with the collaborative, solution-oriented culture that underpins effective development review.

Introducing a formal arbitration mechanism also raises legal concerns, as arbitration is inherently a private process used to resolve contract disputes or private disputes between parties and has not historically been used in planning matters that are intended to be transparent under the Planning Act. Finally, establishing a new arbitration body or process would itself take considerable time and resources to implement (e.g. TLAB), likely adding procedural complexity, confusion between jurisdiction of the City, Tribunal and a new arbitration body in decision making, and processing delays for an unclear or marginal benefit, rather than improving overall decision making and approval timelines.

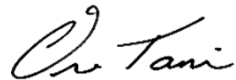
5. “Establish or require municipalities to establish different site plan approval streams for different kinds of proposed development, with corresponding scope of matters that may be controlled. This would mean that a “full” site plan process would only be permitted for larger, complex development initiatives resulting in fewer matters being regulated through site plan control. Less complex development would be triaged to a more expedited stream or could be exempted from site plan control completely”

We support the establishment of differentiated site plan approval streams and are already advancing this work to ensure that review effort is proportionate to the scale and complexity of development. It is important, however, that municipalities retain the flexibility to define and implement their own streams based on local context and operational realities. In Toronto’s case, staff will be recommending a new fee schedule to support implementation of streamed Site Plan review services for Council consideration in June 2026, with implementation targeted for early

2027. Imposing standardized, province-wide streams at this stage could disrupt this initiative, require substantive rework, and ultimately delay delivery of an approach that is already aligned with the Province's intent. We have been working closely with industry stakeholders throughout this process and will continue to keep Ministry staff apprised to ensure our service transformation proceeds efficiently and in alignment with provincial objectives.

Conclusion

We share the concern that approval processes can take too long, and municipalities, like the Province, are focused on being efficient and "in and out" to ensure our own processes continue to flow smoothly. We support legislative changes that would advance our service transformation initiative by reducing unnecessary complexity and addressing unintended consequences resulting from cumulative regulatory changes. We remain committed to working closely with all stakeholders to move this work forward and will continue to keep the Ministry apprised to ensure alignment. Should there be any questions, issues, or feedback regarding our service, please reach out to myself or anyone from the Development Review Division senior leadership team at any time.



Oren Tamir
Interim Executive Director
Development Review

cc: Jason Thorne, Chief Planner and Executive Director, City Planning

Appendix – More Detailed/Technical Comments from Review Partners

Review Partner	Provincial Proposal	Analysis/Comments	Recommendation
Toronto Water	Proposed reform #1: Remove site plan control as a land use planning tool in the Planning Act and the City of Toronto Act, 2006.	These changes are unlikely to deliver the intended streamlining benefits. Without site plan control, interdivisional coordination is reduced, and applicants often assume that Toronto Building is the sole approval authority. As a result, technical servicing issues are frequently overlooked and only identified very late in the process. Despite ongoing efforts to coordinate with Toronto Building to flag issues earlier (which is generally not viewed as part of their role) and the publication of public-facing guidance on requirements, these situations continue to occur.	
	Proposed reform #5: Establish or require municipalities to establish different site plan approval streams for different kinds of proposed development, with corresponding scope of matters that may be controlled. This would mean that a “full” site plan process would only be permitted for larger, complex development initiatives resulting in fewer matters being regulated through site plan control. Less complex development would be triaged to a more expedited stream or could be exempted from site plan control completely.	It is unclear how municipalities are expected to establish different site plan approval streams for different types of development—where a “full” site plan process would be limited to larger, more complex proposals and fewer matters would be regulated through site plan control—when this differentiation has effectively already been achieved through the recent implementation of site plan control exemptions and expanded as-of-right permissions.	
Toronto Transit Commission (TTC)	Proposed reform #1: Remove site plan control as a land use planning tool in the Planning Act and the City of Toronto Act, 2006.	The purpose of the TTC’s Technical Review process is to protect the safety of the transit system from potential impacts of adjacent development, safeguarding the millions of passengers and employees who rely on it each day. As the Technical Review process does not constitute applicable law on its own, the absence of site plan control would eliminate the TTC’s ability to review development applications on adjacent lands. Subsection 41(7)(d) subject to subsection (9.1) of site plan control also allows for the conveyance of land for a public transit right of way. Without the Site Plan Control process, TTC would not have the ability to require the conveyance of lands.	Removing the TTC’s ability to review adjacent development and secure conveyances through site plan control raises significant public safety concerns. If the proposed reform proceeds, an alternative approach should be implemented first to ensure that the TTC and Metrolinx can continue both safety-focused review of adjacent development and the securing of necessary land conveyances.
	Proposed reform #2: Require municipalities to have a maximum of three circulations after which a mandatory meeting is triggered with all relevant municipal department representatives and the applicant to work through and resolve all outstanding issues.	The TTC’s Technical Review process is fundamentally a public safety review, and accelerating or compressing this process risks unintended consequences that could compromise transit system safety	Recommend that reinstituting mandatory pre-consultation application meetings, with guidance and standardization, would likely reduce the number of circulations overall. Also, where staffing resources permit, mandatory virtual meetings between circulation stages may provide greater benefit in clarifying comments and resolving concerns than a single meeting following three circulations. As an alternative approach, consultation with transit agencies such as the TTC or Metrolinx could be pursued to consider whether technical reviews could be conducted outside of site plan control.
	Proposed reform #3: Further scope the site plan review process to a standard site plan approval checklist of functional aspects of a site (e.g., those related to health and safety), with use of certified professionals for acceptance and approval of reports and studies. A municipality is not permitted to request	A one-size-fits-all approach cannot adequately address the range of site-specific conditions and scenarios that arise during site plan review, nor the differing municipal and local contexts. Any effort to proceed on this basis should therefore be approached with considerable caution. Many municipalities	If this proposal proceeds, efforts to implement a standardized site plan approval checklist should be accompanied by a contingent, municipality-specific checklist responsive to site-specific and contextual conditions, similar to the approach outlined in ERO 02600313. Municipalities should also retain

	additional studies and plans beyond what is included in the standard site plan approval checklist. If technical and drawing requirements identified in the checklist are met, site plan approval is issued.	do not have transit service, and/or have procedures different than the TTC, it is unclear how those inconsistencies will be addressed.	the ability to require additional studies or plans if new information arises during review, particularly where public safety considerations are involved. A clear process or set of criteria to guide such requests should be established.
	Proposed reform #5: Establish or require municipalities to establish different site plan approval streams for different kinds of proposed development, with corresponding scope of matters that may be controlled. This would mean that a “full” site plan process would only be permitted for larger, complex development initiatives resulting in fewer matters being regulated through site plan control. Less complex development would be triaged to a more expedited stream or could be exempted from site plan control completely.	The TTC’s Technical Review process already categorizes adjacent development reviews into five levels of complexity, primarily based on proximity to TTC infrastructure, type of infrastructure, and depth of excavation. Introducing a similar tiered approach within site plan approval streams could improve efficiency and clarity for all stakeholders. However, because the TTC’s Technical Review is not applicable law, exempting site plan control would remove the TTC’s ability to review development on adjacent lands, posing a significant risk to public safety.	If this reform proceeds, further consultation with transit agencies, including the TTC and Metrolinx, is recommended in the interest of public safety, either to minimize impacts on technical reviews or to allow those reviews to be conducted outside of site plan control.