

July 15, 2026

Chair Gord Perks, Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Sent via email to: phc@toronto.ca

RE: PH32.8 – Site Plan Application Fee Review

Dear Chair Perks and Members of the Planning and Housing Committee,

The Building Industry and Land Development Association (BILD) is pleased to submit this correspondence to the July 16, 2026 meeting of the Planning and Housing Committee regarding Item PH32.8 – Site Plan Application Fee Review.

BILD thanks City of Toronto Staff for bringing this recommendation report forward. We acknowledge that the report seeks approval to:

1. **Adopt the recommended fee schedule in attachment 1:** This includes deleting existing Site Plan fee categories from the Municipal Code and establishing fee categories to reflect streamed Site Plan services.
2. **Repeal Official Plan Amendment 688:** OPA 688 introduced a complete application requirement to limit the submission of concurrent Zoning By-law Amendment and Site Plan applications. OPA 688 was adopted by Council in September 2023 and has been under appeal to the OLT since November 2023. Concurrent applications can be managed in practice through streamed services instead of a complete application requirement.

Based on these recommendations we understand and appreciate the City's intent to remove barriers to as-of-right development applications, and to continue to improve service delivery and application timelines.

As discussed at our July 9th Toronto Forum meeting, BILD looks forward to being consulted in the fall on how the proposed Site Plan streams are operationalized, and thanks staff for their continued engagement with the development industry throughout this process. We also, look forward to continuing this engagement in an effort to continue to improve service and refine the proposed streams.

We acknowledge the effort that the City of Toronto has made to maintain housing affordability through this process, and that the City is prioritizing savings in staff effort and focusing on increasing efficiencies to close the gap on cost recovery. However, when we look at the maximum fee, it remains high, and when compared to neighbouring jurisdictions is demonstrated to be significantly higher. Please see below for the comparison municipalities:

1. Toronto's max site plan fee is \$621,373
2. Brampton's max site plan fee is \$91,842
3. Vaughan's max site plan fee is \$375,000
4. Mississauga - \$12,164 base fee and max variable fee of \$94,546 for a total max of \$106,170

The benchmarking comparison in Table 6 of the Staff Report looks at a 60-unit, 6-storey building, and that shows Toronto at the bottom of the list with the lowest fees, the highest shown in Table 6 is Brampton. However, Brampton is shown at the max fee for 60 units. As buildings increase in size, Toronto's recommended fees would be significantly higher for most proposed development sizes typically constructed in the City, and particularly, for most financially viable development sizes.

While the City's max fee is being maintained at \$621,373, which equates to a development of 1,537 units, a jurisdictional scan of max fees for neighbouring municipalities shows that for expected development

sizes within Toronto, the City's max achievable fee is significantly higher than municipal benchmarking suggests. As such, BILD requests including benchmarking analysis for 200-unit and 400-unit buildings to clarify the impacts to typical development projects in Toronto, and to further investigate if further refinements are needed.

As partners in building complete communities across Toronto, we offer these comments respectfully and on behalf of the development industry. We look forward to continuing to work with the City of Toronto and other stakeholders to support housing growth and help deliver the homes that Toronto residents need.

Sincerely,



Katherine Berton, MUP
Manager, Policy and Advocacy
BILD

Cc: Danielle Binder, BILD
Michelle Drylie, City of Toronto
Oren Tamir, City of Toronto
Jag Sharma, City of Toronto
BILD Toronto Forum
BILD Renovator Executive Committee