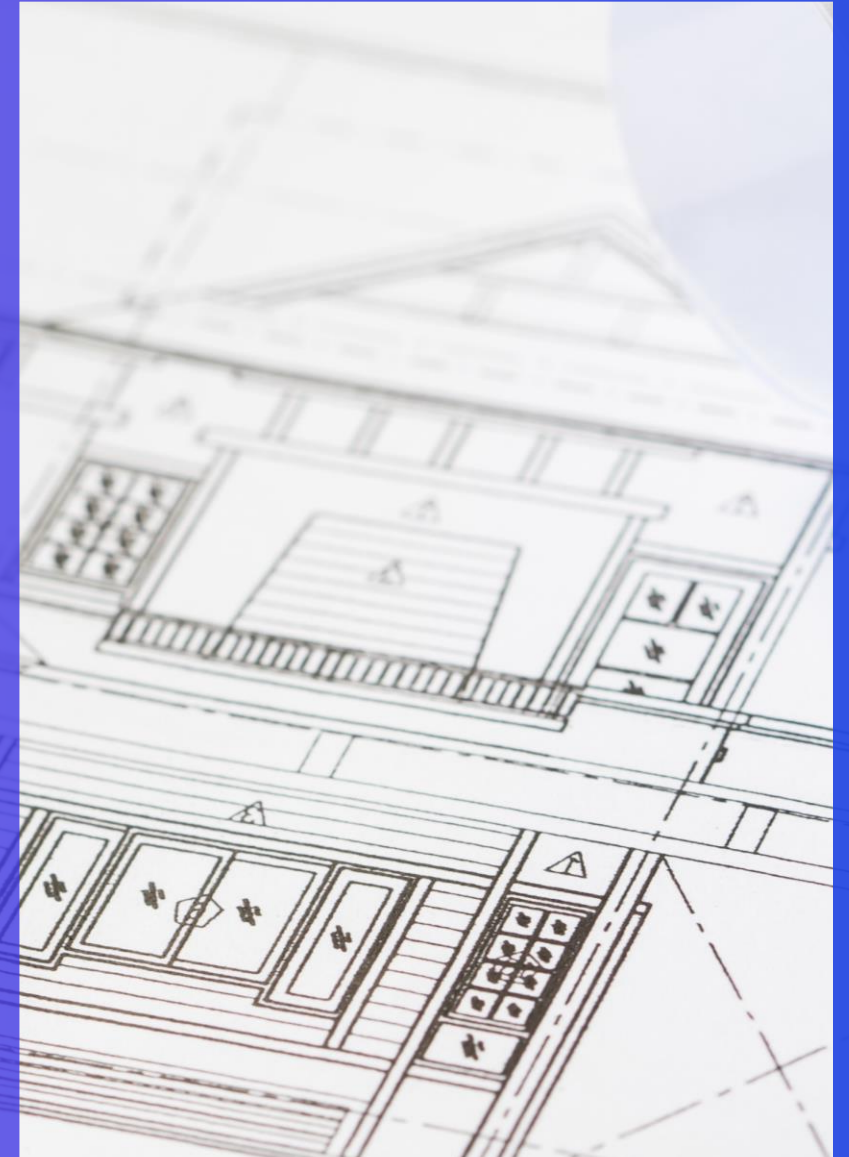**KPMG**

Committee of Adjustment Service Delivery Review

Final Report

City of Toronto

—

February 2025

Disclaimer

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Executive Summary

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1. Executive Summary

The City of Toronto (City) engaged KPMG LLP (KPMG) to undertake a review of the Committee of Adjustment's service delivery model (the Service Delivery Review).

This report presents our findings. It builds on a previous KPMG study that focused on improving the public hearing process for applicants and members of the public (the Public Hearing Review). Many of the recommendations identified in that study are now being implemented, including:

- A refreshed website and new notice of hearing template;

- The development of a public participation handbook;

- A structured approach to engagement with industry and members of the public;

- An enhanced training program for panelists; and,

- A streamlined online speaker registration process and other improvements to virtual participation in public hearings.

The Public Hearing Review also identified the need to address the systemic challenges facing the Committee of Adjustment's decentralized, geographic-based service delivery model. These challenges include:

- Increasing costs: the cost to the City of processing minor variance and consent applications increased significantly between 2021 and 2024;

- Lost revenue: the Committee of Adjustment continues to face a significant gap between its costs and revenues, despite an intention to be a fully cost-recovered service;

- Unmet timelines: while some districts have approached the City's business standard timeline of 60 days for a minor variance application and 90 days for a consent application, average timelines remain significantly higher; and,

- Inconsistent service delivery: there are significant variations in nearly every aspect of service delivery across the Committee of Adjustment's four districts, including: application processing costs, timelines, processes, public hearings, the roles and responsibilities of staff, workloads and the tools used to support service delivery.

Recommendations

This report presents eight recommendations to address those challenges and improve the Committee of Adjustment's performance, including:

- A City-wide, functional administrative structure;

- Enhanced application intake and determination of completeness;

- A new streaming process;

- A City-wide panel structure;

- A dedicated hearing room; and,

- Shorter, more frequent hearings.

These recommendations represent significant change to the Committee of Adjustment's service delivery model. See pages 7-9 for a summary of the recommendations and the key features of the recommended structure. Taken together, the proposed recommendations will help to:

- Reduce application processing costs;

- Improve application processing timelines;

- Increase organizational flexibility, including the ability to respond to changes in application volumes across the City;

- Enhance the consistency and predictability of service delivery; and,

- Improve the staff, applicant, panelist and public experience.

If fully implemented, the recommendations have the potential to significantly reduce the City's application processing costs through improvements to:

- Application intake: eliminating duplicate activities and reducing the error rate;

- Application processing: adopting the practices of the highest performing district; and,

- Circulation: eliminating duplicate activities, streaming applications and standardizing commenting practices.

1. Executive Summary

Implementation Considerations

Given the significant degree of change from the current state associated with the recommendations and the need to align many of the changes with panelist appointments, we have assumed an approximately three-year implementation period.

Where relevant, the recommendations include suggestions for interim measures pending full implementation. Page 10 presents an estimated implementation timeline for each recommendation.

Successful implementation will require dedicated resourcing and expertise from various City Divisions. See page 12 for additional implementation considerations.

About this Report

Our findings are based on the following sources of information:

- The Public Hearing Review, including supporting engagement with applicants, applicant representatives, panelists and members of the public as well as jurisdictional research of other Committees of Adjustment;

- A review of 15 datasets, including application volumes, decision rates, appeal rates, hearing frequencies and hearing lengths;

- A review of 21 documents, including staffing and budgetary information as well as key performance indicators and various staff-led analyses;

- The development of nine different service delivery models and various supporting elements;

- Three co-design workshops with senior Committee of Adjustment staff to test and refine different service delivery model options; and,

- Additional engagement with nearly 40 staff from the Committee of Adjustment and commenting partners to gather feedback on different service delivery model options and supporting elements.

The recommendations also draw on findings from the City's 2024 development application fee review (Fee Review), which was supported by KPMG. The Fee Review included detailed, district-specific process mapping, an analysis of the staff effort required to process applications and an analysis of the City's application processing costs.

See Section 2 for additional information about the project, including objectives, scope and the activities undertaken to support the development and assessment of different service delivery models.
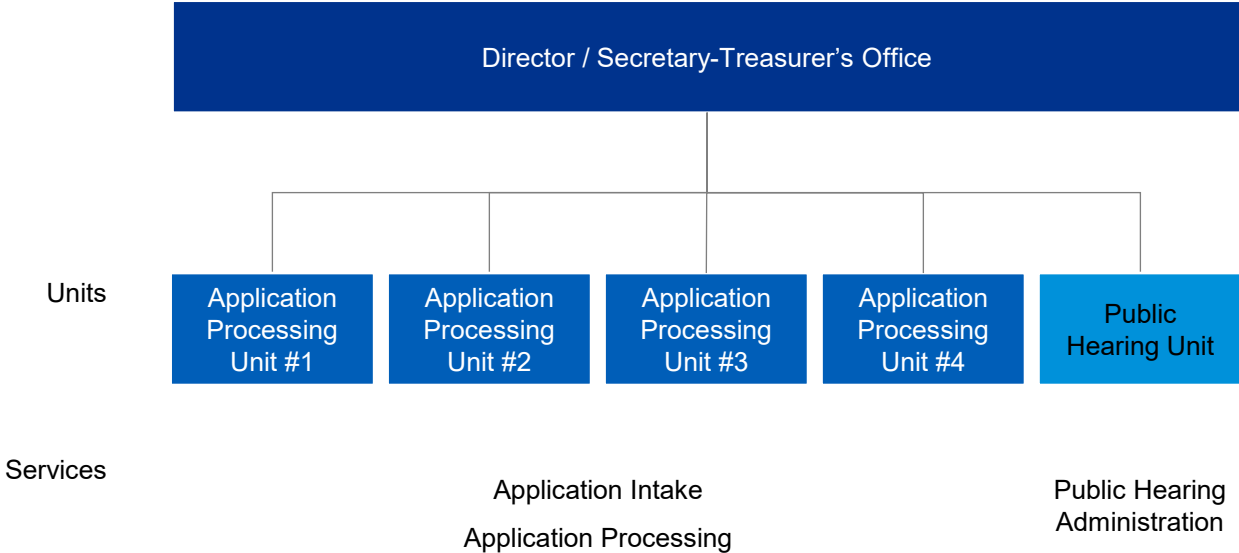
1. Executive Summary: Recommendations

This page presents a summary of our recommendations. They are organized intro three categories: organization, process and public hearings. Additional detail about each recommendation is included in Section 3.

#	Recommendation	Page
Organization		
1	Adopt a City-wide administrative structure to improve the flexibility and consistency of service delivery.	19
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Process		
3	Stream applications to reduce costs and improve the applicant, public and panelist experience	23
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7	Cap hearing lengths and increase hearing frequencies to improve participation in public hearings.	29
8	Develop a business case to evaluate the benefits of a single, centralized hearing room.	30

This page presents the draft future state administrative structure for the Committee of Adjustment as identified in Recommendations 1 and 2. See the next page for a description of the mandate and estimated staffing for each unit.

Director / Secretary-Treasurer's Office

Units

| Application Processing Unit #1 | Application Processing Unit #2 | Application Processing Unit #3 | Application Processing Unit #4 | Public Hearing Unit |

Services

Application Intake

Application Processing

Public Hearing Administration

Key Features

- City-wide, functional structure to improve flexibility, consistency and transparency.

- Three core services: application intake, application processing and public hearing administration.

- Four identical, City-wide Application Processing Units that can scale in response to changing application volumes.

- One Public Hearing Unit to facilitate public hearings, including in-person and virtual elements.

- Consistent City-wide service delivery, including processes, timelines and public hearings.

- Streamlined circulation model to reduce duplication and application processing costs.

- Enhanced level of service for applications that are circulated to improve the applicant, panelist and public experience.

This page presents the services and staffing levels of each unit in the proposed administrative structure. Staffing levels are estimates based on information available at the time of review and should be refined alongside implementation of the final structure.

Section	Services	Staff Positions (Estimated Full-time Equivalents)
Application Processing Unit (x4)	**Application Intake** • Determination and application of fees • Upload to IBMS **Application Processing** • Customer service • Completeness review • Schedule hearings • Prepare and issue public hearing notices • Attend hearings to provide subject matter expertise • Post-hearing implementation • Exercise delegated authorities • Create and maintain public record	• Manager / Deputy Secretary-Treasurer (1) • Application Technician (6) • Senior Planner (1) • Support Staff (2)
Public Hearing Unit	**Public Hearing Administration** • Compile and transmit hearing agendas • Agenda briefings* • Register and coordinate public speakers • Hearing minutes and decisions* • Room and technology set up • Administer hearings • Process appeals	• Supervisor (1) • Support Staff (6)

* These activities would also be supported by an Application Technician and Senior Planner from the relevant Application Processing Unit.

This page presents an implementation plan for the recommendations included in our report. This estimate depends on the availability of adequate resourcing to support implementation. See page 18 for additional implementation considerations.

#	Recommendation	2025		2026				2027			
		Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Organization											
1	Adopt a City-wide administrative structure to improve the flexibility and consistency of service delivery.	■	■	■	■						
2	Integrate application intake into the Committee of Adjustment to reduce duplication and intake error rates.	■	■								
Process											
3	Stream applications to reduce costs and improve the applicant, public and panelist experience			■	■	■					
4	Undertake a comprehensive review of application requirements and application forms.	■	■	■	■						
5	Develop standard operating procedures to improve consistency and predictability.			■	■						
Public Hearings											
6	Adopt a City-wide panel structure to improve the public hearing process and organizational flexibility.				■	■	■	■	■	■	■
7	Cap hearing lengths and increase hearing frequencies to improve participation in public hearings.				■	■	■	■	■		
8	Develop a business case to evaluate the benefits of a single, centralized hearing room.	■	■	■							

02

Project Background

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The Service Delivery Review took place between December 2023 and January 2025. The need for a comprehensive review of the Committee of Adjustment's service delivery model was identified in a previous KPMG study, the Public Hearing Review (see Public Hearing Review, Recommendation 2.15).

Objectives & Scope

The objective of the Service Delivery Review was to identify an efficient and effective service delivery model to help address the challenges identified in the Public Hearing Review (see Public Hearing Review, Appendix D: Current State Assessment).

The scope of the Service Delivery Review included:

- The services delivered by the Committee of Adjustment and supporting City partners;

- The processes, practices and procedures used to support service delivery;

- The Committee of Adjustment's administrative and panel structure;

- The roles and responsibilities of the Committee of Adjustment and supporting City partners; and,

- Staff and panelist resourcing as well as service delivery costs.

The scope did not include the policy or regulatory frameworks that determine Committee of Adjustment applications or a detailed examination of the technology that supports Committee of Adjustment operations.

Work Plan

Our work took place in three phases. See page 14 for a summary. Additional details about each phase are included below.

Phase 1: Current State Evaluation

During this phase of work, we worked closely with the City's Project Team to confirm our objectives, scope and workplan. We also developed a Service Delivery Model Framework to guide our work. The Framework is included on page 15 and includes 14 questions across five service delivery model layers. We used the framework to guide our research

activities and structure the development of different service delivery model options.

We also completed a review of data and documents to refine the current state assessment completed through the Public Hearing Review, which had a narrower focus on the public hearing process. The results of this analysis are included in Appendix A, including a scorecard of relative performance across districts. See Appendix C for the data and documents reviewed through our work.

Phase 2: Delivery Model Options Analysis

During this phase of work, we developed, tested and refined different service delivery models.

Working with the City's Project Team, we developed nine different service delivery models. The models varied across the different layers of our Service Delivery Model Framework. At a high-level, we considered:

- Opportunities to organize staff and panelists around function, geography, application type, application complexity and applicant type;

- Different approaches to application streaming, including application type, application complexity and applicant need;

- The relationship between various administrative and panel structures;

- Variations in the average number of applications per hearing;

- Different approaches to application circulation and review, including its potential impact on resourcing and timelines; and,

- The roles and responsibilities of Committee of Adjustment and commenting partner staff.

We completed an initial evaluation of the models through three co-design workshops with senior Committee of Adjustment staff to identify a preferred option. We refined the preferred option through eight additional workshops with staff from the Committee of Adjustment and supporting City Divisions, including representatives from all commenting partners. See Appendix B for a list of stakeholders engaged through our work.

Phase 3: Report

During the final phase of our work, we synthesized our findings into this report. We also completed additional engagement with the City's Project Team to share feedback from the staff engagement sessions and further refine our recommendations.

Draft versions of this report were shared with and reviewed by the City's Project Team. Revisions have been incorporated into this final version.

Supporting Projects

Alongside the Service Delivery Review, KPMG also supported the City's Fee Review. Many of the activities completed to support the Fee Review were also used to support the Service Delivery Review, including:

- Detailed process mapping of the minor variance and consent process across each district, including the development of process maps and the identification of variations across districts;

- Detailed process mapping of the circulation and review process with each commenting partner;

- An analysis of the staff effort required to process minor variance and consent applications across each process step identified through the process mapping activities;

- The development of a costing model to understand the costs to the City of processing minor variance and consent applications; and,

- The development of a recommended fee structure.

These activities were incorporated into our current state assessment, the development of service delivery model options and the recommendations included in this report.

Phase 1: Current State Evaluation	Phase 2: Delivery Options Analysis	Phase 3: Report
Objectives		
Assess current state service delivery model	Evaluate at least five service delivery models and select preferred option	Concise final report and supporting presentations
Activities		
› Assessment framework › Quantitative evidence base › Targeted stakeholder and leading practice research	› Design principles › Develop service delivery models › Four workshops to test and refine options › Additional stakeholder engagement	› Draft final report › Present draft final report for feedback › Finalize report › Support additional briefings as needed
Outputs		
✓Interim presentation	✓Preferred service delivery model	✓Final report ✓Supporting presentations

Model Layer	Guiding Question	Service Model Elements
Service	*What services are delivered and to whom?*	1. The internal and external services delivered by the Committee of Adjustment (and the customers to whom those services are delivered) 2. Current and future service levels 3. The total cost of delivering those services
Process	*How is the work structured?*	4. The high-level processes, practices and procedures used to deliver the Committee of Adjustment's services (e.g, intake, review, hearing, the streaming of applications, etc.)
Organization	*How is the team structured?*	5. The Committee of Adjustment's location within the City's organizational structure 6. The Committee of Adjustment's internal organizational structure (e.g., functional, geographic, hybrid) 7. The Committee of Adjustment's panel structure (e.g., functional, geographic, centralized) 8. The organizational relationship of the Committee of Adjustment to its partner Sections/Divisions
People	*What does each member of the team do?*	9. The roles and responsibilities of Committee of Adjustment staff 10. The roles and responsibilities of staff in partner Divisions 11. The resourcing required to deliver the Committee of Adjustment services 12. The skills and competencies required to deliver the Committee of Adjustment's services
Technology	*What technology is used to support service delivery?*	13. The technology systems used to support service delivery 14. The other tools used to support service delivery (e.g., templates, trackers, etc.)

Zoning Review	Application Intake	Application Processing	Application Review	Public Hearing Administration	Panelist Support & Training	Public Education & Outreach
• Preliminary review of plans to confirm zoning and applicable by-law compliance	• Determination and application of fees • Intake and initial review of applications for completeness • Upload applications to IBMS	• Provide process-related information to applicants • Review for completeness • Schedule hearings • Prepare and issue public hearing notices • Post-hearing implementation • Exercise delegated authorities • Create and maintain public record	• Provide subject matter-related information to applicants • Subject matter review of applications • Prepare staff reports • Determine required conditions and clear conditions once imposed	• Compile and transmit hearing agendas • Agenda briefings • Register and coordinate public speakers • Hearing minutes and decisions • Room and technology set up • Administer hearings • Process appeals	• Onboarding and ongoing training • Coordinate and administer compensation for CoA members • Technology support	• Provide information on how to engage in public hearing process • Develop public-facing materials • Maintain website • Respond to public inquiries

Focus of Service Delivery Review

■ CoA
■ Toronto Building
■ Partner Divisions*

* Community Planning, Official Plan, Heritage Planning, Archaeology, Economic Development, Engineering & Construction Services, Urban Forestry, Ravines

03

Recommendations

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This section presents eight recommendations that are intended to help the Committee of Adjustment improve the performance of its service delivery model. For each recommendation, we provide a brief rationale and associated outcomes. Where relevant, the rationale includes interim measures to consider pending full implementation.

Implementation Considerations

Page 10 presents an estimated implementation timeline for each of the recommendations included in this section. We have assumed an approximately three-year implementation timeline given:

- The significant degree of change from the current state;
- The need to align Recommendations 6, 7 and 8 with the appointment of new panelists;
- The additional analysis required to identify the impact of the recommendations on partner Divisions;
- The opportunity to consider how these recommendations can be integrated with related City initiatives, including ongoing organizational changes related to the City's planning and development services; and,
- The opportunity for additional engagement with panelists, applicants and members of the public, which was outside the scope of this review.

The timeline may need to be extended depending on the availability of resourcing to support implementation. Similarly, additional analysis of the dependencies across recommendations may be required should the City choose to implement some but not all of the recommendations.

Based on our experience with similar services, we anticipate that successful implementation will require a dedicated project manager for the full implementation period. The project manager will also require access to support staff with the following skills and experience:

- Business planning;
- Program and project management;
- Business process improvement, including process design and implementation;
- Business case development;
- Subject matter expertise related to the Committee of Adjustment and commenting partners;
- Stakeholder management;
- Communications; and,
- Change management.

These supporting staff should have time dedicated in their work programs to support implementation. The specific staff and required level of effort should be identified through more detailed planning activities.

#	Recommendation	Description	Outcomes
1	Adopt a City-wide administrative structure to improve the flexibility and consistency of service delivery.	The administrative structure that supports the Committee of Adjustment is organized geographically into four districts that correspond to the City's Community Council areas. Each district provides the same services (application processing and public hearing administration) with the same staff positions (Manager/Deputy Secretary-Treasurer, Application Technician, Senior Planner and Support Assistant), though the number and mix of positions varies significantly across districts. A key finding from our research is that the district-based administrative structure is a significant barrier to performance, contributing to: • Ineffective, inflexible resource management; • Inconsistencies across all aspects of service delivery, including processes; timelines; staff roles, responsibilities and workloads; public hearings; and, application processing costs (i.e., the cost to the City of processing the application); • Unmet legislative and business standard timelines; and, • The development of distinct, district-based cultures and ways of working. To address these challenges, the City should consider adopting the functional organizational structure identified on page 8. This structure was developed through our co-design workshop series and refined with input from Committee of Adjustment staff. The key features of the proposed organizational structure are: • The integration of application intake into the Committee of Adjustment (see Recommendation 2); • The separation of application processing and public hearing administration into separate units; • Four identical, City-wide application processing units that provide application intake and application processing; and, • A public hearing unit that provides public hearing administration.	• Improve flexibility to respond to changes in application volumes and staff complement • Enhance consistency and predictability of service delivery • Reduce application timelines • Reduce application costs

#	Recommendation	Description	Outcomes
1	(continued)	A draft mandate and staffing structure for each unit is included on page 9. Based on the scope of our review, we assumed that the public hearing unit is located within the Committee of Adjustment. However, the City may also wish to explore whether the City Clerk's Office, which manages City Council and committee meetings, could support or deliver public hearings.	

#	Recommendation	Description	Outcomes
2	Integrate application intake into the Committee of Adjustment to reduce duplication and intake error rates.	All Committee of Adjustment applications are submitted electronically by email to a general mailbox. Toronto Building application examiners currently perform the following application intake activities: • Upload applications to IBMS; • Review applications for completeness; • Generate submission status letters for complete and incomplete applications; and, • Support application fee payment. Submission status letters are automatically generated in the City's workflow management system. Similarly, most payments are made online through the City's self-serve portal. Committee of Adjustment applications make up less than 1% of the planning and building applications received by Toronto Building. Our research identified the following challenges with application intake: • Duplication of effort: Toronto Building and the Committee of Adjustment undertake sequential application completeness reviews, which increases timelines and application costs. • Error rates: Committee of Adjustment staff consistently indicated that incomplete applications are identified by Toronto Building as complete, which increases timelines, costs, applicant frustration and staff workloads. • Unclear direction: Toronto Building staff indicated that they do not have clear direction on what constitutes a complete application, which contributes to application intake errors. While training was recently implemented, there is no service level or similar agreement between the Committee of Adjustment and Toronto Building that supports application intake. To address these challenges, the City should consider relocating application intake from Toronto Building to the Application Processing Units within the Committee of Adjustment. Within each Application Processing Unit, a staff person would be responsible for intake activities with oversight provided by the Application Technician.	• Enhance consistency and predictability of service delivery • Reduce application intake error rate • Reduce application timelines • Reduce application costs • Improve the applicant experience

#	Recommendation	Description	Outcomes
2	(continued)	In addition to the outcomes identified on the previous page, improving the consistency and accountability of the application intake function will help enable the proposed circulation model (see Recommendation 3). It also has the potential to enhance the applicant experience by providing applicants with a more direct line of communication to Committee of Adjustment staff. While a detailed review of the technology that supports application intake was outside the scope of our review, the City should also consider exploring opportunities to leverage technology solutions to improve application intake and completeness review. **Completeness Review: Terms of Reference** In addition to relocating application intake, the Committee of Adjustment, in consultation with its commenting partners, should develop terms of reference to support the determination of application completeness. For each application type and application requirement, the terms of reference should provide a definition and description sufficient to assess completeness. They should also be made publicly available to help applicants improve application quality and reduce the number of incomplete applications. The terms of reference should be aligned with similar tools developed to support the intake and determination of completeness for other types of development applications.	

#	Recommendation	Description	Outcomes
3	Stream applications to reduce costs and improve the applicant, public and panelist experience	All Committee of Adjustment applications are circulated for review and, in some cases, comment, by eight different City commenting partners.[*] It is an applicant-led model that places the onus on applicants to identify and engage with commenting partners. The circulation and commenting process varies significantly across Committee of Adjustment districts and commenting partners but typically involves the following steps: • A hearing agenda is circulated to commenting partners by Committee of Adjustment staff; • Commenting partners independently review the agenda to identify any applications of interest; • Applications of interest are reviewed in greater detail to determine whether comments should be provided; and, • Where necessary, commenting partners prepare a report, which is sent back to Committee of Adjustment staff to be shared with the applicant and public and included in the members package for the public hearing. Circulation and review is the most effort-intensive component of the Committee of Adjustment process, accounting for most of the City's application processing effort and cost. In addition to high costs and inconsistent commenting practices, our research identified the following challenges:[**] • Duplication of effort: each commenting partner independently reviews the agenda to identify applications of interest; • Unclear standards: across all commenting partners, there are no formal guidelines or similar tools to determine which applications should be reviewed and / or when comments should be provided, significantly increasing review effort; and, • Missed deadlines: commenting deadlines are often missed with the result that staff reports are received too late to be reviewed by applicants, the public or panelists, which contributes to late-stage application revisions and deferrals.[***]	• Reduce duplication • Reduce application costs • Improve application timelines • Enhance consistency and predictability of commenting process • Improve applicant, public and panelist experience

[*] The commenting partners are: Community Planning; Urban Forestry; Transportation Services; Engineering & Construction Services; Strategic Initiatives, Policy & Analysis; Archaeology; Heritage Planning; and Economic Development & Culture.
[**] These findings build on the Public Hearing Review, specifically Findings 6.2.2 and 6.2.3.
[***] The Public Hearing Review recommended that the Committee of Adjustment consider eliminating substantive application revisions following the distribution of the public notice (Recommendation 2.8).

#	Recommendation	Description	Outcomes
3	(continued)	To address these challenges, the City should consider adopting a new model for the circulation and review of Committee of Adjustment applications. The proposed model was developed through our co-design workshop series and refined with input from Committee of Adjustment and commenting partner staff. The key features of the proposed model are: • **Application streaming**: the Committee of Adjustment would identify applications that require one or more comments from partners prior to circulation using pre-determined criteria. Applications that meet the pre-determined criteria would be shared directly with relevant commenting partners. Applications that do not meet the pre-determined criteria would not be circulated and proceed directly to a hearing, reducing application processing costs and time-to-hearing. • **Enhanced service level**: applications that are circulated for review would receive a higher level of service. Specifically, the staff lead assigned to the file would be responsible for i) ensuring comments are provided by the commenting deadline; ii) consolidating comments into a single package for applicants, panelists and members of the public; and, iii) acting as a point of contact for applicants to facilitate the resolution of staff comments, where necessary. The proposed model builds on the recommendations from the Public Hearing Review, specifically the development and implementation of guidelines, templates and deadlines to improve the commenting process (see Recommendation 2.13). These improvements will be required to operationalize the model proposed here.	

#	Recommendation	Description	Outcomes
4	Undertake a comprehensive review of application requirements and application forms.	Alongside the relocation of the application intake function (Recommendation 2), the City should consider undertaking a comprehensive review of its i) application requirements and ii) application forms. A careful review of application requirements and application forms was outside the scope of our study; however, many stakeholders indicated that application requirements can be unduly burdensome, particularly for smaller applications (e.g., the requirement for an up-to-date survey), and that application forms can be difficult to complete for inexperienced applicants (e.g., identifying the subject site's Official Plan designation). The Public Hearing Review identified an opportunity to refresh certain application requirements to improve public participation (see Recommendation 2.6). The review of application requirements proposed here is broader and should consider: • Time and cost to applicants, including the costs associated with any supporting consultants or studies; • Proportionality to the size and complexity of different applications (e.g., reasonableness of a requirement for a small versus a large application); • Impact on panel decision-making; • Impact on public participation; • Efficiency of review (e.g., ease with which the requirement be reviewed by staff, committee and the public); and, • Alignment with associated applications, like building permits (e.g., whether associated applications have the same or different requirements). The review of application requirements would also support the development of terms of reference for completeness review (Recommendation 2), which provide guidance on how application requirements can be met. The review of application forms should be aligned with the Committee of Adjustment's ongoing review of public-facing communications and resources (see Public Hearing Report, Recommendation 2.2).	• Reduce application intake errors • Improve applicant experience • Enhance consistency and predictability of service delivery

#	Recommendation	Description	Outcomes
5	Develop standard operating procedures to improve consistency and predictability.	The process mapping completed to support the Fee Review identified significant differences across Committee of Adjustment districts related to: • Process steps and supporting activities, including intake, file assignment, application review, circulation, applicant communication, scheduling and the preparation of materials before and after public hearings; • The roles and responsibilities of Committee of Adjustment staff; • Workload management (i.e., how staff workloads are managed); and, • The tools and platforms used to support service delivery (e.g., the software used to transmit member packages, the workflow management tools used to track applications and hearings). These differences create barriers to moving work and staff across districts. They are also reflected in the relative performance of each district, with significant variations in service levels (see Appendix A). To address these challenges and facilitate the implementation of the new organizational structure, the City should develop standard operating procedures, including: • The end-to-end minor variance and consent processes, including intake, completeness review, circulation, notice, hearing preparation and post-hearing activities; • The roles and responsibilities of Committee of Adjustment staff; • The roles and responsibilities of commenting partners; and, • The tools and platforms used to support service delivery. The process mapping completed for the Fee Review, including the ways of working of the highest performing districts, can be used as a starting point for the proposed standard operating procedures.	• Improve consistency and predictability of service delivery • Reduce application costs by standardizing way of working from highest performing district(s)

#	Recommendation	Description	Outcomes
6	Adopt a City-wide panel structure to improve the public hearing process and organizational flexibility.	The Committee of Adjustment's 35 City Council-appointed citizen members are organized into four geographic panels that correspond to the City's Community Council districts. A panel can only hear an application from within its Community Council district. Similarly, members cannot sit on a panel in another Community Council district. Like the district-based administrative structure, the district-based panel structure is a significant barrier to performance, contributing to: • Inconsistent public hearing practices across districts, which reduce the transparency and predictability of the public hearing process and drive public and applicant frustration (see Public Hearing Review Finding 6.1.3); • Inconsistent, often long hearing durations, which create a barrier to public participation and drive panelist frustration; • Inconsistent hearing frequencies; and, • Inconsistent panelist workloads (e.g., in 2023, applications per panelist across districts varied by more than 40%, from a low of 66 to a high of 94). Alongside these performance-related challenges, Committee of Adjustment staff also indicated that the geographic panel structure limits the number of panelists available to participate in a hearing. To address these challenges, the City should consider adopting a City-wide panel structure. The Committee of Adjustment's 35 citizen members would be organized into a single, City-wide pool. Like today, five-member panels would be organized for each hearing. Unlike today, there would be no geographic restriction on the applications that could be heard by a panel or the members that could sit on a panel. Two challenges associated with the shift to a City-wide panel structure identified through our research are i) potential travel time increases for applicants and members of the public and ii) a potential decrease in the local knowledge of members, specifically, that all panel members may not have local knowledge related to a majority of the applications before a panel.	• Enhance consistency and predictability of public hearings • Improve consistency of hearing durations, hearing frequencies and panelist workloads • Improve flexibility in panel resourcing to respond to changes in application volumes and member availability

3. Recommendations: Public Hearings

#	Recommendation	Description	Outcomes
6	(continued)	The travel time associated with attending hearings is in part mitigated by the City's recent decision to permanently shift to hybrid hearings, which ensures the opportunity to participate virtually for applicants and members of the public. Similarly, the City could explore retaining the existing district-based hearing model with a City-wide panel structure, eliminating any travel-time impacts for staff, applicants and members of the public, though our initial analysis of this option suggests that it may create additional challenges for staff to efficiently deliver hearings. In terms of local knowledge, it will continue to be provided to panelists by the evidence presented by participants at public hearings. That evidence includes the City's application review and comments, which are currently conducted by district-based staff. Implementing this recommendation will need to be aligned with the recruitment and appointment of new panel members. Existing members were appointed on the basis of the four-panel structure. The terms of all existing members expire in November 2026. As an interim measure and to help facilitate the transition to a City-wide panel structure, the City should consider moving applications or panelists across existing panels on an as-needed basis to help balance panel workloads and hearing lengths.	

#	Recommendation	Description	Outcomes
7	Cap hearing lengths and increase hearing frequencies to improve participation.	In 2023, the average length of a public hearing was approximately 6.8 hours, though there was significant variation across districts, from a low of 4.9 hours to a high of 8.3 hours. Similarly, hearing frequencies varied across districts from a low of one hearing per month to a high of three hearings per month. As noted in the Public Hearing Review, hearing lengths are a significant barrier to applicant and public participation, particularly for equity-deserving communities, as longer hearings require a larger time commitments from participants. Panelists engaged as part of the Public Hearing Review also indicated that it was burdensome to sufficiently review application materials for longer hearings, given the volume of material and the time allowed for review, particularly for late submissions. To address these challenges the City should consider capping public hearing agendas to 20-25 items, which would result in hearing lengths of approximately five hours. Assuming 3,500 applications per year, this would require between 175 and 140 hearings per year, a significant increase over today's approximately 100 hearings per year. Operationalizing shorter, more frequent hearings will require the implementation of many of the other recommendations included in this report, including a dedicated public hearing unit, a City-wide panel structure and dedicated public hearing rooms. Like Recommendation 6, implementing changes to hearing lengths and frequencies will need to be phased with the recruitment and appointment of new panel members. A phased approach to implementation will also allow the opportunity for the City to engage applicants, members of the public and panelists on the proposed changes.	• Improve participation for applicants and members of the public • Improve flexibility in panel resourcing to respond to changes in application volumes and member availability

#	Recommendation	Description	Outcomes
8	Develop a business case to evaluate the benefits of a single, centralized hearing room.	Each Committee of Adjustment panel holds public hearings at its respective Civic Centre. Hearing rooms at each of the four locations are shared with other users and do not have the same access to technology or other equipment. The current four-location model: • Contributes to inconsistent public hearing practices across districts (see Public Hearing Review, Finding 6.1.3); • Requires Committee of Adjustment staff to prepare the room before and after each hearing (approximately two to three hours of effort per hearing or 200 to 300 total hours annually); and, • Reduces scheduling flexibility and, in some cases, can result in rescheduled hearings due to demand from other users for the same space. To address these challenges, the City should explore the opportunity to create a single, dedicated hearing room for all public hearings. Located at a central, transit-accessible location, a dedicated hearing room would: • Enhance the consistency of public hearing practices by ensuring consistent access to the same room setup and technology; • Improve virtual participation through the use of Committee-specific tools and technology; • Improve scheduling flexibility; • Enable shorter, more frequent hearings (see Recommendation 8); • Reduce the costs associated with room preparation; and, • Reduce the negative impacts of cancelled hearings. Our initial analysis suggests that a single location could result in an increase in car and transit travel time for in-person hearing participants. While this increase is in part mitigated by hybrid hearing model, additional analysis is required to quantify the impacts on travel time at a more granular level.	• Enhance consistency and predictability of public hearings • Enable shorter, more frequent hearings • Improve flexibility of scheduling

#	Recommendation	Description	Outcomes
8	(continued)	As a first step, the City should develop a business case to help determine the merits of a centralized hearing room. The business case should include: • The costs of maintaining a dedicated space, including the potential for cost recovery; • A granular analysis of travel time impacts for public hearing participants; • An analysis of the potential benefits of a dedicated space, including those mentioned in this recommendation; and, • The impacts of a dedicated space on participation in public hearings, including consulting with applicants, applicant representatives, member of the public and City Councillors. Alongside the development of the business case, the City should consider opportunities to improve the current four location model by i) identifying a permanent space in each Civic Centre and / or ii) ensuring a consistent room set up, including access to technology, in each Civic Centre.	

04

Appendices

Appendix A

Current State Data Analysis & Performance Scorecard

KPMG

Context for Data Analysis

📊 Data Sources

Data sources:

- Application volumes (2018 – 2023);

- Decision and appeal rates (2018 – 2023);

- Number of hearings (2022 – 2023);

- Average hearing length (2023);

- Scheduled hearing dates by district (2022 – 2023);

- Operating budget (2023); and,

- Open data pull of closed applications since 2017.

Assumptions:

- Head Office staffing and budget excluded from District-level analysis.

2023 District Performance Assessment

Category	District Average	Etobicoke York	Toronto East York	North York	Scarborough
Applications per staff	**Total: 64** MV: 58 | C:6	**Total: 58** MV: 52 | C:6	**Total: 83** MV: 78 | CO: 5	**Total: 57** MV: 54 | CO: 3	**Total: 57** M: 49 | CO: 8
Applications per panelist	**Total: 75** MV: 70 C: 5	**Total: 71** MV: 65 | CO: 6	**Total: 94** MV: 91 | CO: 3	**Total: 66** MV: 64 | CO: 2	**Total: 67** MV: 58 | CO: 9
Average time spent per item in a public hearing (minutes)	12	11	13	13	11
Minor Variance average service level (days from intake to hearing)	74	67	84	62	83
Consent average service level (days from intake to hearing)	110	92	96	91	160
Relationship between application volume and service level changes	1.0 : 4.0*	1.0 : 2.8	1.0 : 1.6	1.0 : 1.7	1.0 : 9.8

*For every 1% change in application volume, there was a 4% increase in the time from intake to hearing.

Changes in Application Volumes Across Districts

Key takeaways

- Significant annual variation in application volumes within and across Districts (low of 1% and high of 31%).

- In 2022, volumes decreased by 31% in Scarborough District and 11% in North York District.

- Direction of change (increase or decrease) shared across Districts with exception of two years in Scarborough (2019-20 and 2022-23).

	Smallest y/y Δ in volume	Year of smallest Δ in volume	Largest y/y Δ in volume	Year of highest Δ in volume
District	--	--	--	--
Etobicoke York	1%	2019	25%	2020
Toronto East York	6%	2019	25%	2021
North York	11%	2022	31%	2021
Scarborough	2%	2023	31%	2022

Percentage Change in Annual Application Volume (All Application Types)

% Δ in volume

SC: ~30% increase

NY: ~20% decrease

x-axis: 2018 - 2019, 2019 - 2020, 2020 - 2021, 2021 - 2022, 2022 - 2023

Legend: Etobicoke York — Toronto East York — North York — Scarborough
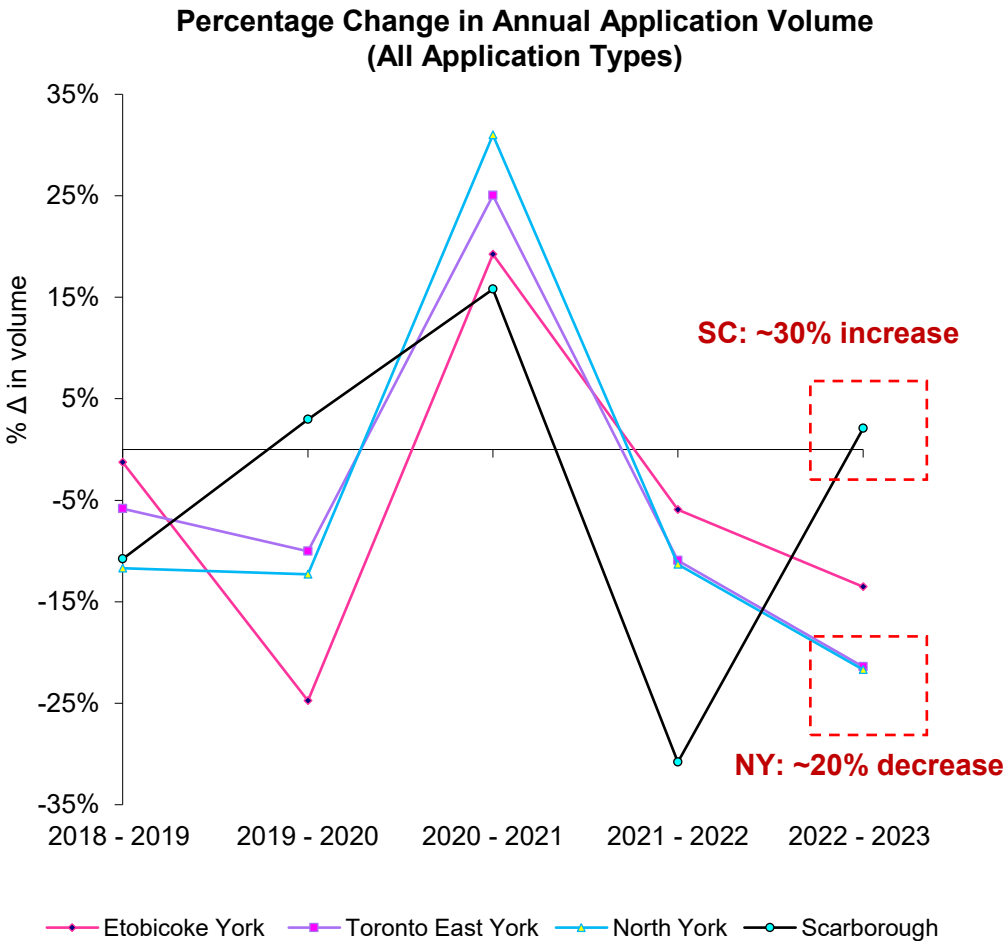
Data source: CofA Application Volume 2018-2023

Public Hearing Lengths
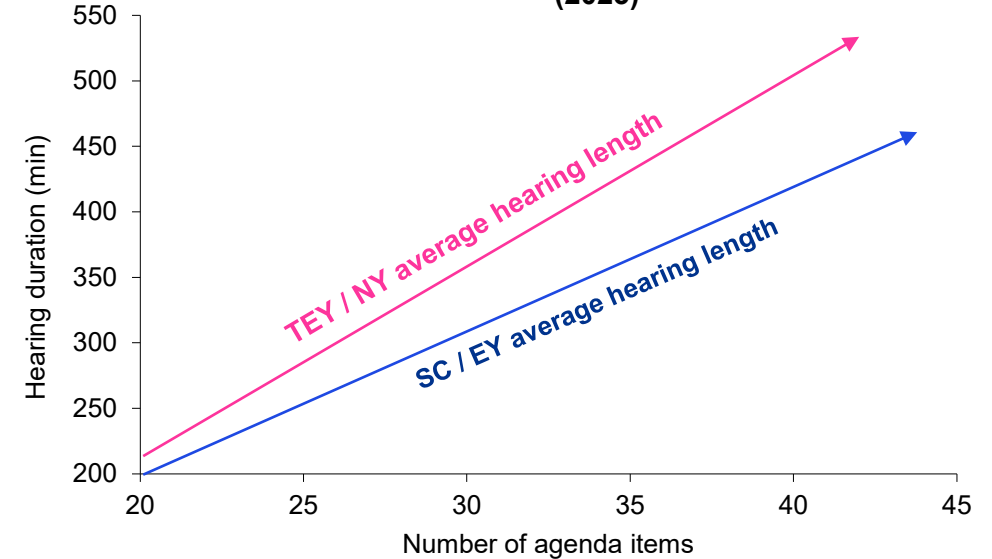
Key takeaways

- In 2023, average hearing time per agenda item increased by ~20% (two minutes) following the transition from virtual to hybrid hearings.

- The absolute increase (minutes) per agenda item was the same across all Districts.

- Average time per item was 2 minutes longer in NY and TEY compared to compared to EY and SC in both hearing formats.

- Increases in agenda items result in bigger increases in hearing durations in TEY/NY than in SC/EY.

- Time per item decreases as agenda size increases. City-wide, time per item decreases from 15 minutes for agendas with 15-20 items to 12 minutes for agendas with 41-45 items.

Relationship between hearing duration and agenda items (2023)

District	Virtual – Average time per item (min)	Hybrid – Average time per item (min)	Δ Change in average time per item (%)
	January - Mid July 2023	Mid July - December 2023	--
Etobicoke York	10	12	20
Toronto East York	12	14	17
North York	12	14	17
Scarborough	10	12	20
District Average	11	13	18

|	Average time per item (min)
# of items per agenda	2023
15-20	15
21-25	11
26-30	14
31-35	13
36-40	12
41-45	12

Data source: Average Hearing Length

Application Timelines & Business Standards

Key takeaways

- Over the five year period reviewed, no Districts met the City's business standard timeline or the provincial statutory timeline.

- Despite having the second highest application volume, NY is consistently the closest to meeting business standard timelines.

- In 2023, all Districts except Scarborough came close to meeting the consent business standard of 90 days.

**Minor Variance Timeline
(Intake to Hearing)**

**Consent Timeline
(Intake to Hearing)**
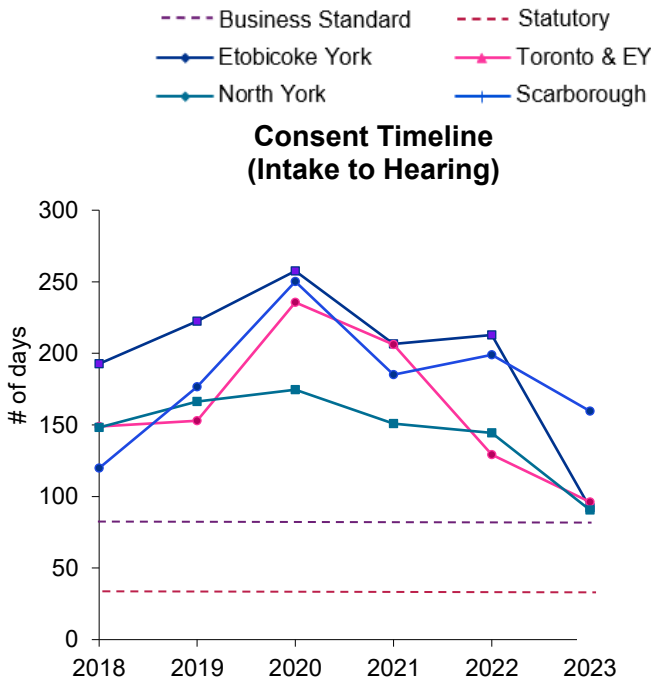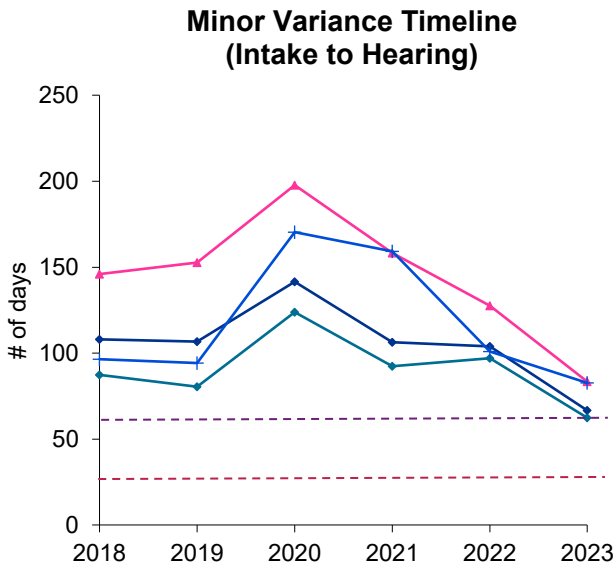
	Minor Variance and Consent Timeline from Intake to Hearing (days)						
District	2018	2019	2020	2021	2022	2023	**Average**
Etobicoke York	MV: 108 | CO: 193	MV: 107 | CO: 222	MV: 142 | CO: 257	MV: 106 | CO: 207	MV: 104 | CO: 213	MV: 67 | CO: 92	MV: 106 | CO: 197
Toronto East York	MV: 146 | CO: 149	MV: 153 | CO: 153	MV: 199 | CO: 241	MV: 158 | CO: 206	MV: 127 | CO: 129	MV: 84 | CO: 96	MV: 145 | CO: 162
North York	MV: 87 | CO: 148	MV: 80 | CO: 166	MV: 124 | CO: 175	MV: 92 | CO: 151	MV: 97 | CO: 144	MV: 62 | CO: 91	MV: 91 | CO: 146
Scarborough	MV: 97 | CO: 120	MV: 94 | CO: 177	MV: 170 | CO: 247	MV: 159 | CO: 185	MV: 101 | CO: 199	MV: 83 | CO: 160	MV: 117 | CO: 181

Data source: OPEN DATA

# Relationship between Timelines and Volumes

Key takeaways

- For the most part, the time between intake and hearing decreases as application volumes decrease.
  - Since 2021, service levels for minor variances increased by ~43% while volumes decreased by ~28%.
  - Since 2021, service levels for consents increased by ~41% while volumes decreased by ~25%.

District		2018	2019	2020	2021	2022	2023
MV	Average Timeline (days)	109	109	159	129	107	74
	Total Volume	3441	3215	2818	3552	3125	2550
CO	Average Timeline (days)	152	180	230	187	171	110
	Total Volume	350	313	274	285	228	214

Data source: OPEN DATA

Minor Variance: Service Levels against Volumes

Total Application Volume
Average Service Levels
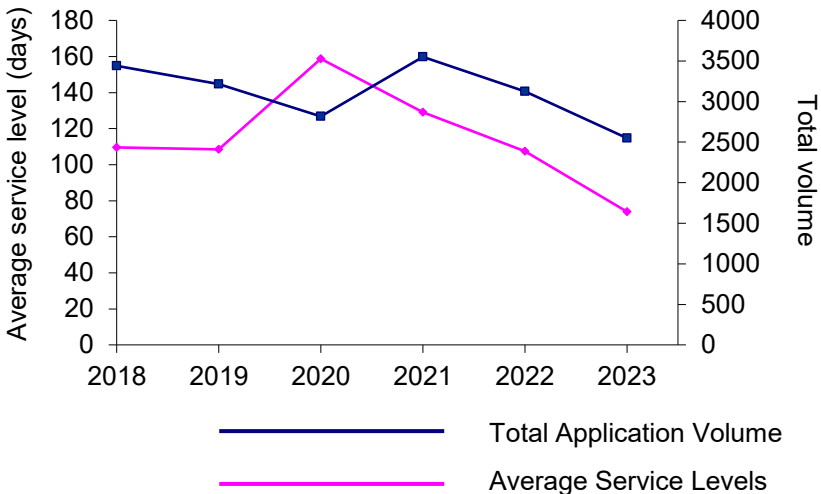
Consents: Service Levels against Volumes
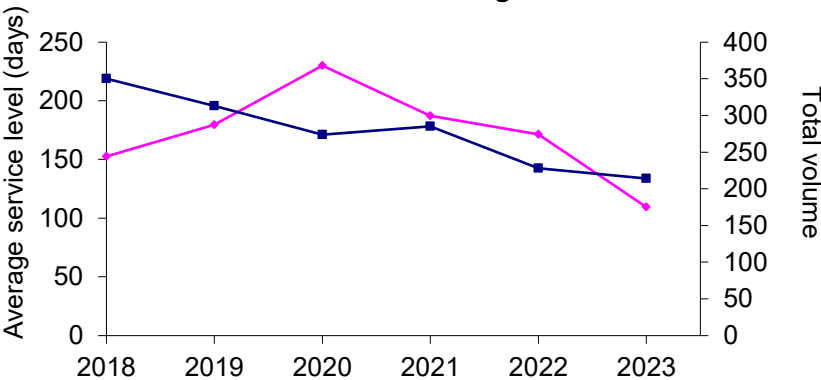
Application Types (Minor Variance)

Key takeaways

- Minor variance application types have been relatively consistent over the five year period reviewed.

- Alterations to Existing Dwellings and New Residential Dwellings consistently constitute 80% of minor variance applications.
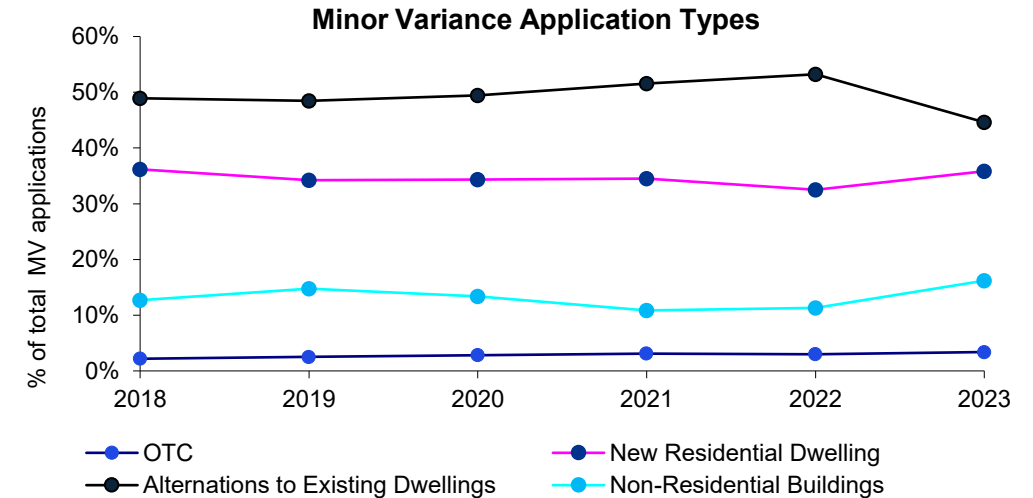
- The most common application types differ across Districts: Alterations to Existing in TEY/EY and New Residential in NY/SC.

Minor Variance Application Types

Legend: OTC, New Residential Dwelling, Alternations to Existing Dwellings, Non-Residential Buildings

Application Compositions (% of total) – Minor Variance						
Application type	2018	2019	2020	2021	2022	2023
Order to Comply	2%	3%	3%	3%	3%	3%
New Residential Dwellings	36%	34%	34%	34%	32%	36%
Alternations to Existing Dwellings	49%	48%	49%	52%	53%	45%
Non-Residential Buildings	13%	15%	13%	11%	11%	16%

Data source: OPEN DATA

Legend: Non-Residential Buildings, Alternations to Existing Dwellings, New Residential Dwelling, OTC
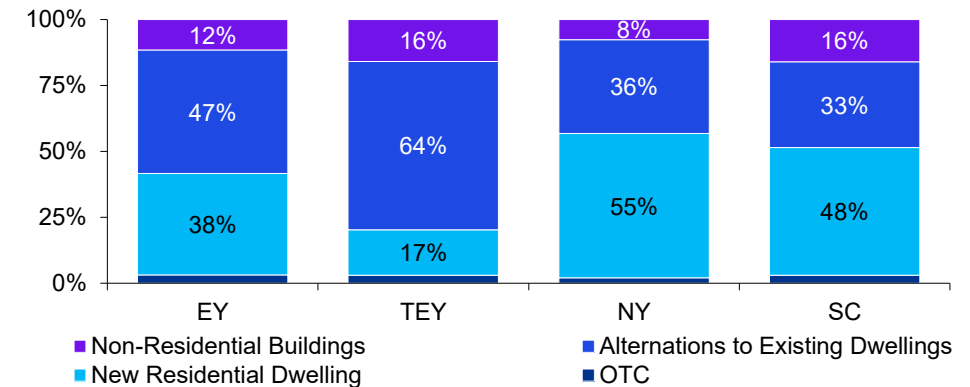
Application Types (Consent)

Key takeaways

- The CoA consistently received a similar composition of consent application types between 2018 and 2021. However, since 2022, the split of delegated consent applications has exceeded severances.

- In 2023, severances continue to be the most common type of consent.
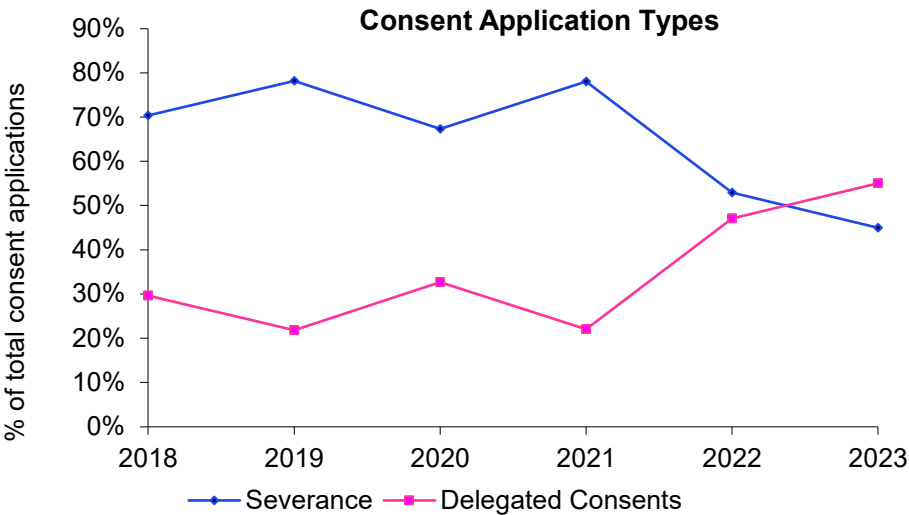
Consent Application Types

Application Compositions (% of total) – Consents						
Application type	2018	2019	2020	2021	2022	2023
Severance	70%	78%	67%	78%	53%	45%
Easement	16%	10%	12%	11%	27%	30%
Lot Addition	10%	7%	14%	7%	13%	15%
Mortgage Discharge	1%	0%	0%	1%	1%	0%
Lease	1%	3%	4%	2%	5%	5%
Validation of Title	2%	2%	2%	1%	1%	5%

Data source: OPEN DATA

Document Classification: KPMG Confidential
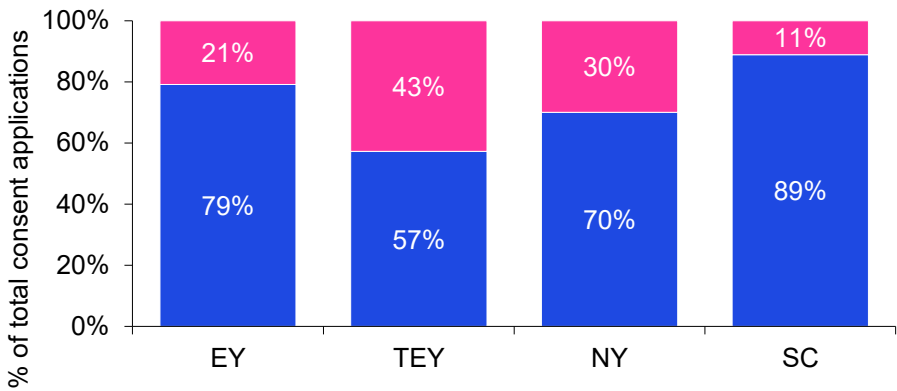
Relationship between Timelines and Application Types

Key takeaways

- Service levels across different types of minor variance applications have converged since 2020.

- In 2023, the time from intake to hearing for minor variances ranged from 72 days for a new residential dwelling to 80 days for a non-residential building.

- Overall, the differences in intake to hearing durations across application types has decreased in 2023.

Intake to hearing across MV application types (2018 - 2023)

Intake to hearing across CO application types (2018 - 2023)

Application type	Intake to hearing timelines (days)					
	2018	2019	2020	2021	2022	2023
Order to Comply	107	119	159	151	135	87
New Residential Dwelling	118	123	171	134	113	72
Alternations to Existing Dwellings	110	105	153	123	109	74
Non-Residential Buildings	142	139	204	161	122	80
Severance	158	186	263	213	181	131
Delegated Consents	128	145	199	148	137	95

Data source: OPEN DATA
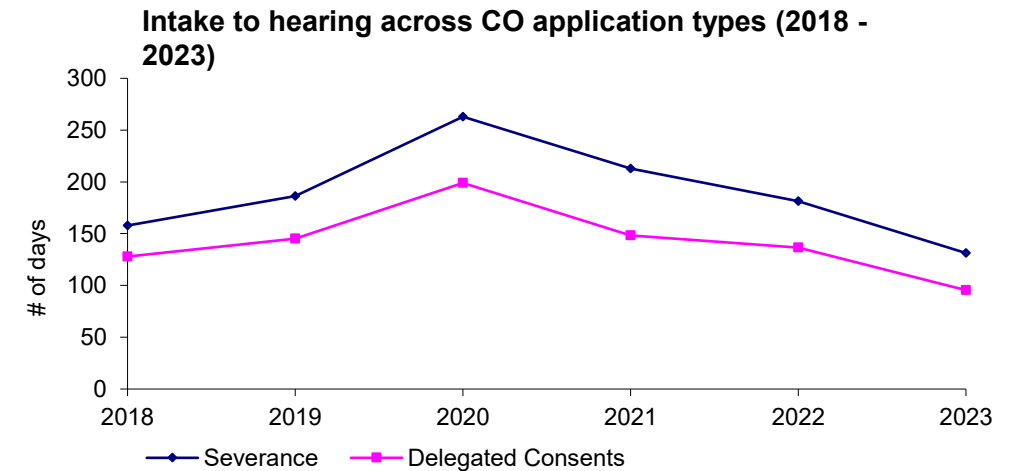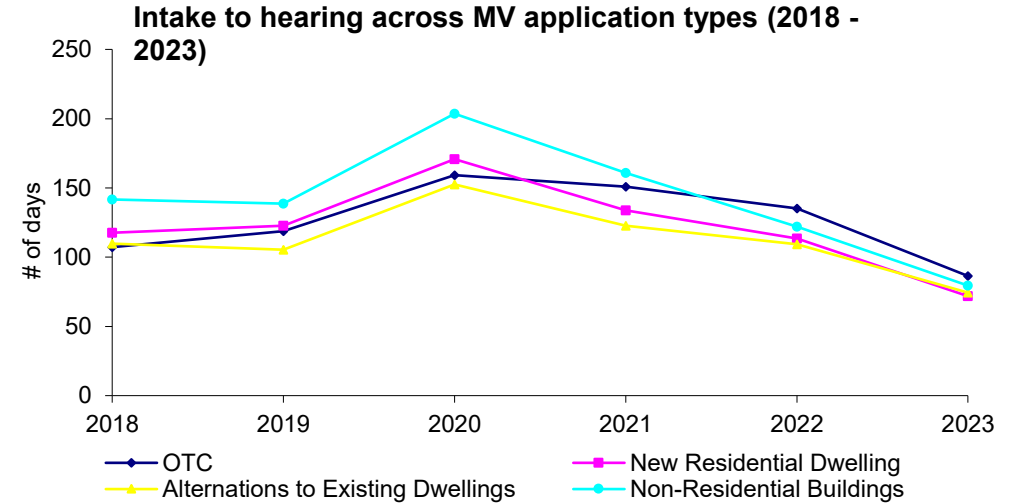
Appendix B

Stakeholders Consulted

Stakeholder Register: CoA Staff

#	Position	Department / Division
1	Acting Director Zoning and Secretary Treasurer	CoA
Committee of Adjustment – Etobicoke York Committee of Adjustment		
2	Manager and Deputy Secretary-Treasurer	CoA
3	Senior Planner	CoA
4	Application Technician	CoA
5	Support Assistant	CoA
Committee of Adjustment – North York Committee of Adjustment		
6	Manager and Deputy Secretary-Treasurer	CoA
7	Senior Planner	CoA
8	Application Technician	CoA
9	Application Technician	CoA
10	Application Technician	CoA
11	Support Assistant	CoA
12	Support Assistant	CoA

#	Position	Department / Division
Committee of Adjustment – Toronto & East York Committee of Adjustment		
13	Manager and Deputy Secretary-Treasurer	CoA
14	Senior Planner	CoA
15	Application Technician	CoA
16	Support Assistant	CoA
Committee of Adjustment – Scarborough Committee of Adjustment		
17	Manager and Deputy Secretary-Treasurer	CoA
18	Senior Planner	CoA
19	Application Technician	CoA
20	Support Assistant	CoA

#	Position	Department / Division
21	Chief Planner & Executive Director	Chief Planner's Office
22	Project Manager, Zoning and Committee of Adjustment	City Planning
23	Chief Planner	City Planning
24	Deputy Secretary-Treasurer	Zoning and Committee of Adjustment, City Planning
25	Director	Community Planning, Toronto & East York District
26	Senior Planner	Community Planning, Etobicoke York District
27	Senior Planner	Community Planning, Toronto & East York District
28	Senior Planner	Community Planning, North York District
29	Senior Planner	Community Planning, Scarborough District
30	Manager	Transportation Review, Etobicoke York and North York District
31	Manager	Transportation Review, Scarborough District, Toronto & East York North and South District
32	Senior Project Manager	Transportation Review, Toronto & East York North District
33	Manager	Development Engineering, Scarborough District
34	Engineering Technical Coordinator	Development Engineering, Toronto & East York North District
35	Manager	Development Engineering, Etobicoke York District

#	Position	Department / Division
36	Manager	Tree Protection & Plan Review, Parks, Forestry & Recreation
37	Program Standards & Development Officer	Tree Protection & Plan Review, Parks, Forestry & Recreation
38	Supervisor	North York District, Tree Protection & Plan Review, Parks, Forestry & Recreation
39	Supervisor	Tree Protection and Plan Review, Parks, Forestry & Recreation
40	Senior Projects Coordinator	Urban Forestry
41	Senior Business Development Officer	Economic Development and Culture
42	Project Manager	SIPA - Official Plan & Legislation
43	Archaeology Project Manager	Heritage Planning, Urban Design
44	Program Manager	Heritage Planning, Urban Design
45	Director, Policy & Strategic Support	Toronto Building
46	Director/Deputy Chief Building Official, Customer Experience	Toronto Building
47	Planning Consultant	Toronto Building
48	Director/Deputy Chief Building Official	Toronto Building, Toronto & East York District
49	Manager	Toronto Building
50	Application Examiner	Toronto Building

Appendix C

Documents & Data Reviewed

Documents Reviewed

#	Documents	Date Received
1	Organizational chart & Total number of FTEs	December 21, 2023
2	CoA KPI Summary (3 month period in 2017)	December 21, 2023
3	Job profiles for all staff roles	December 21, 2023
4	List of CoA services provided	December 21, 2023
5	Sample meeting minutes from a public hearing	December 22, 2023
6	CoA Operating Budget (2023)	January 29, 2024
7	CoA Total Application Volumes (2015 – 2023)	January 29, 2024
8	CoA Total Volumes by District (2018 – 2023)	January 29, 2024
9	CoA Decisions (2018 – 2023)	January 29, 2024
10	OPEN DATA – Closed Applications since 2015	January 29, 2024
11	CoA Number of Hearings (2022 – 2023)	January 29, 2024
12	Average Hearing Lengths (2023)	January 29, 2024

#	Documents	Date Received
13	February 2015: Project Charter Completed for KPI Automation Solution	February 9, 2024
14	Review of April May 2022 Minor Variance Applications	February 12, 2024
15	Review of MV Requests Res Low Rise 2012 General Results	February 12, 2024
16	Review of April May 2018 Minor Variance Applications My Report	February 12, 2024
17	April May 2018 MV Magnitude of Variance Requests	February 12, 2024
18	CoA Application Analyses Report Nov 21 2019	February 12, 2024
19	Preliminary Staff Hearing Location Costs	October 10, 2024
20	TEY Draft Pre-Hearing Circulation Process 2019	October 17, 2024
21	TEY Pre-circulation Criteria 2019	October 17, 2024

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