



Canadian  
Home Builders'  
Association



# MUNICIPAL BENCHMARKING 2024 STUDY



Altus Group

# **CHBA National Municipal Benchmarking Study**

3rd Edition

Prepared by:

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## Executive Summary

This report is the third edition of the bi-annual Canadian Home Builder's Association National Municipal Benchmarking Study, produced by Altus Group. Previous editions were published in September 2020 (1st edition) and September 2022 (2nd edition).

The study examines market trends and several municipal land-use planning-related factors that may be hindering the supply of housing and contributing to housing affordability issues in 23 municipalities across Canada. The study benchmarks these municipalities on the following criteria:

- **Approval Timelines:** The average length of time it takes an application for a residential development to go through the approval process. The study reviews application timelines for each application type;
- **Municipal Fees:** Including infrastructure-related charges levied on new developments and the fees imposed to review planning applications; and
- **Planning Features:** Analysis of municipal features and tools used to facilitate more efficient and transparent development processes.

Municipalities are benchmarked based on their performance on the three measures against each other and relative to past study periods.

This edition of the study further provides detail on how a municipality's performance on these measures influences housing outcomes, including affordability and availability of housing for young families, and the total cost implications of these municipal processes and policies.

### *Measuring a return to normal*

The prior edition (the 2<sup>nd</sup> edition) was completed in 2022, just as the world was coming out of pandemic-related lockdowns. The pandemic was a highly disruptive event that affected the way and where people work. This 3<sup>rd</sup> edition will help us understand how these structural changes have impacted the development application processes across Canada. This report represents a 'return to a new normal' examination.

The pandemic also shone light on the importance of dealing with the housing crisis in Canada and policymakers at all levels of government are paying more attention to it.

This has meant greater participation among municipalities in this study. The biggest change since the prior two additions of this study is improved access to municipal data. Previous studies have relied more heavily on data collected by Altus Group based on an intensive search for a sample of development application data. This time, 18 of the 23 municipalities studied provided information to help support the research outlined in this report. Improved access to municipal-owned data has facilitated an analysis of all application submissions between 2022 and 2024 for the majority of study municipalities.



Meanwhile, there have been a significant amount of policy movements across the Country meant to make the building of housing easier. This report is an opportunity to assess how these changes are working.

### Key Takeaways of This Study

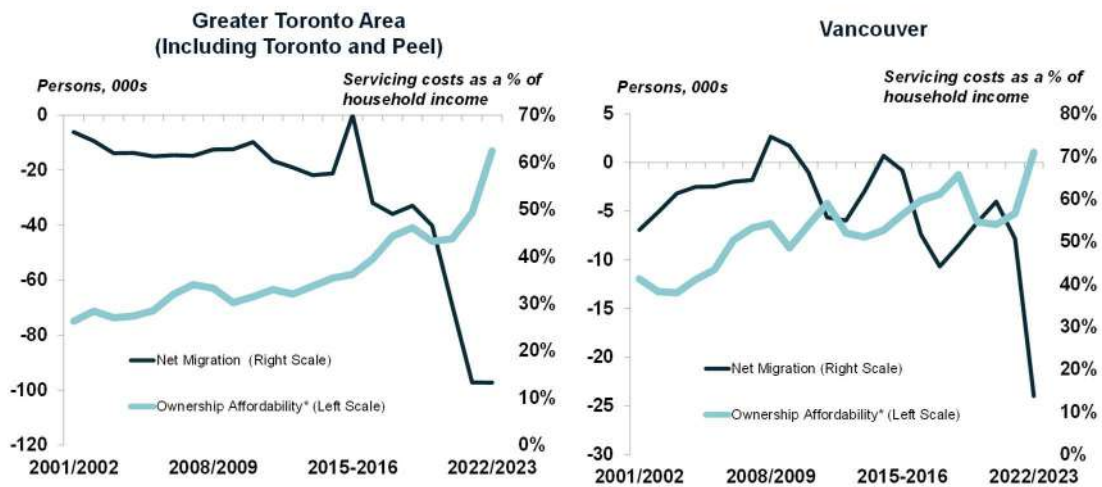
There are several key findings of this report.

**Takeaway #1:** *Calgary, Edmonton and Durham were the top destinations for young people living in Canada between 2021 and 2023.*

All municipalities studied experienced explosive population growth between 2021 and 2023, along with immigration. However, growth was limited in some of the larger municipalities studied

Toronto, Peel and Vancouver, had a significant outflow of residents through out-migration, as housing affordability deteriorated considerably in these areas.

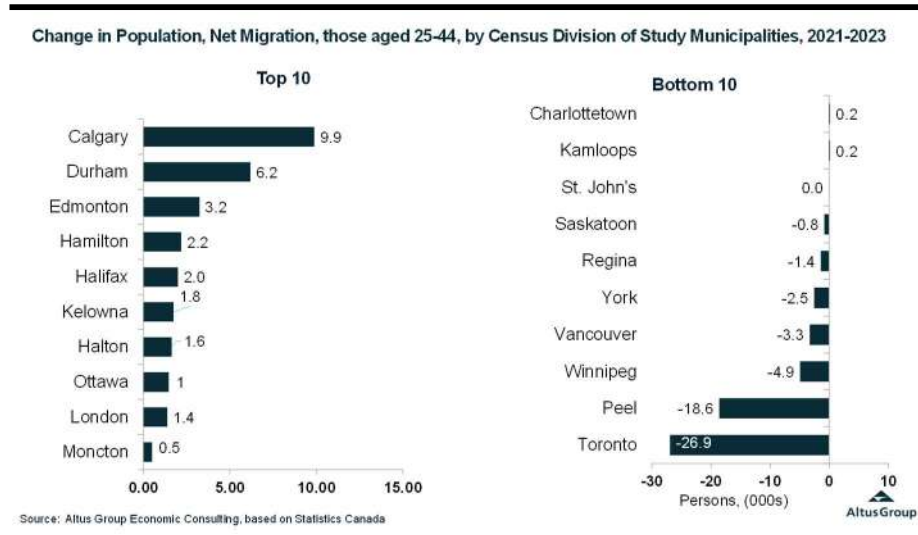
### Ownership Affordability\* and Out-Migration (Net Intra and Interprovincial Migration), Toronto and Vancouver, 2001-2023



\*Based on 20% Downpayment, Average resale price, a five-year fixed mortgage, with a 25-year amortization rate.  
Source: Altus Group Economic Consulting, based on Statistics Canada and Canadian Real Estate Association

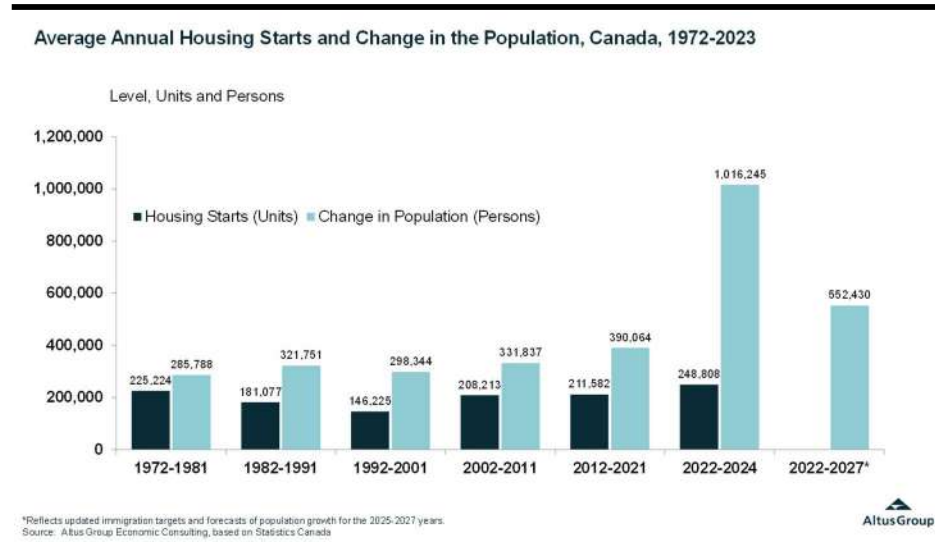
In contrast, the top 3 destinations for those aged 25-44 already living in Canada were Calgary, Edmonton and Durham.

Figure ES- 2



**Takeaway #2:** The 2022-2031 period is on track be the decade with the fewest homes built per new persons added to the population, since at least 1972.

Figure ES- 3

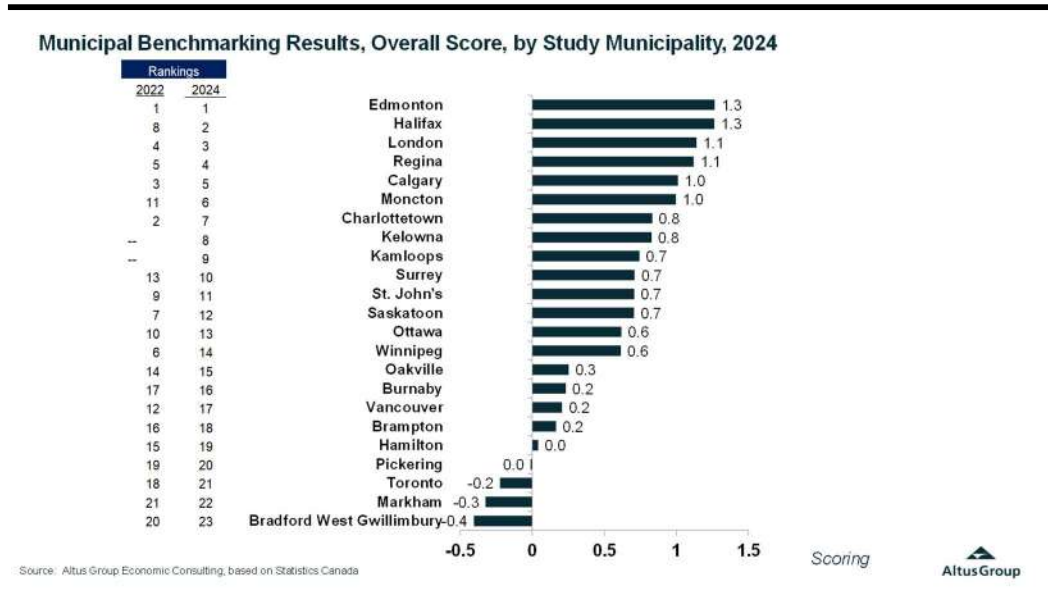


**Takeaway #3:** Ontario municipalities consistently benchmark below the rest of Canada, with the exception of London

For a second year in a row, the lowest four ranking municipalities are Bradford West Gwillimbury, Markham, Toronto and Pickering. These municipalities consistently benchmark lower than other municipalities due to lengthy approval processes and high fees charged on

development applications and new residential developments. Edmonton, Halifax and London were the top performing municipalities.

Figure ES- 4



**Takeaway #4:** Municipal fees charged on new residential developments went up by an average of \$27,500 for a unit in a low-rise development and \$3,000 for a unit in a high-rise development since the 2022 Study.

Figure ES- 5

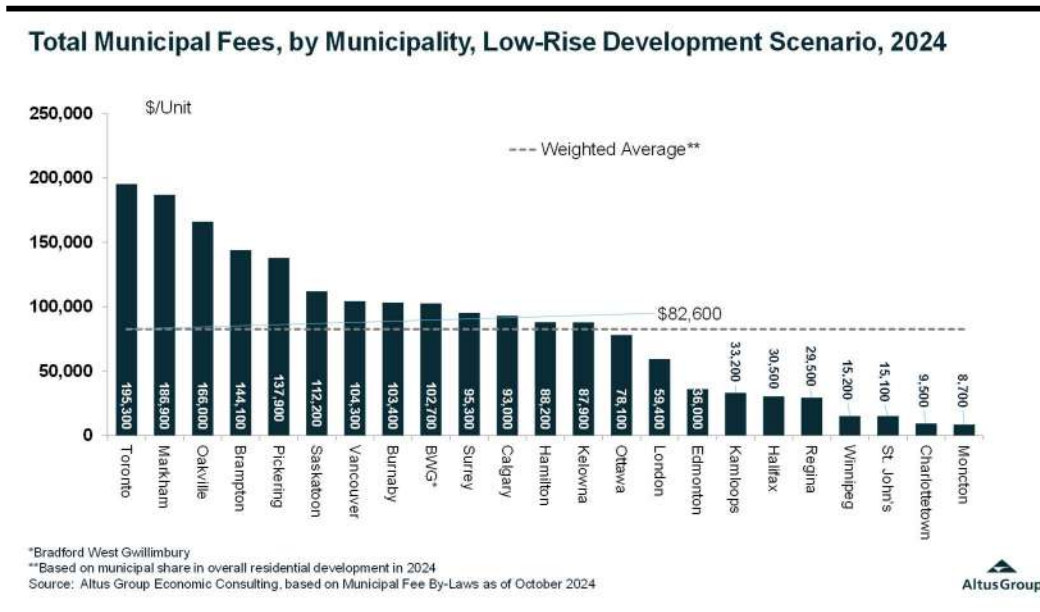
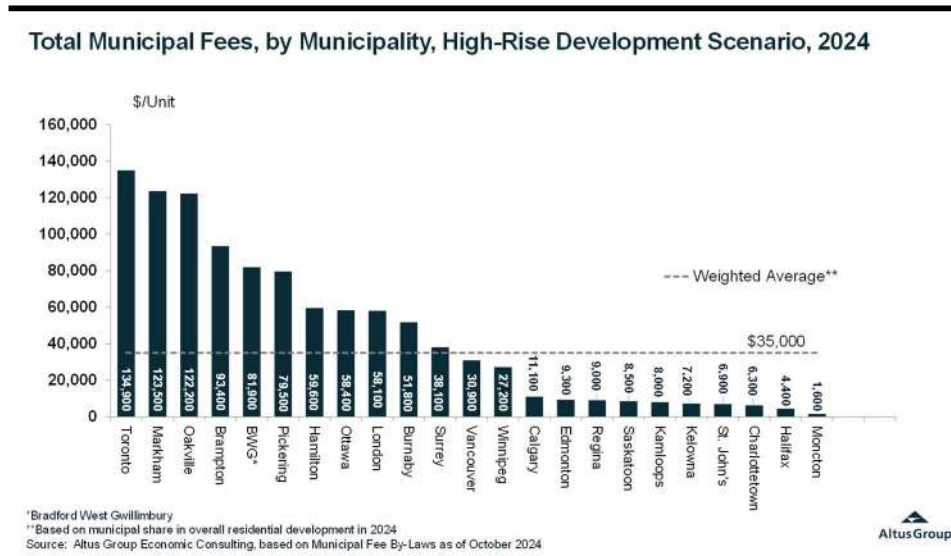


Figure ES- 6



Total combined municipal fees ranged from:

- A low of \$8,700 in Moncton to a high of \$195,300 in the City of Toronto for a unit in a low-rise development; and
- A low of \$1,600 in Charlottetown to a high of \$134,900 in Toronto for a unit in a high-rise development.

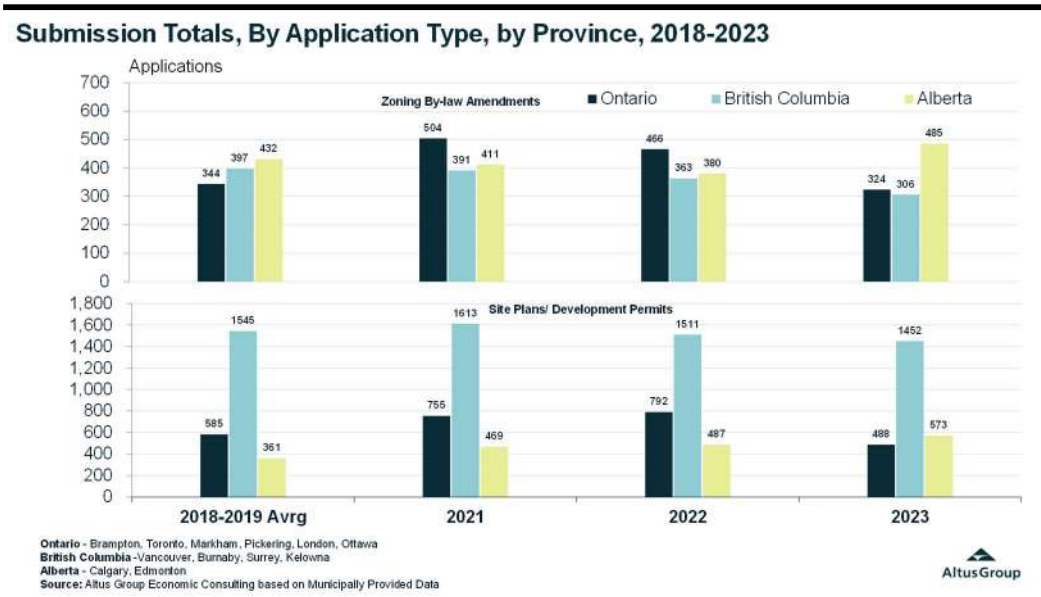
**Takeaway #5:** *Combination of a challenging economic backdrop and costly application processes are leading to fewer application submissions*

- Application submissions have fallen significantly since peaking in 2021, in both Ontario and British Columbia. The decline has been driven by site-plan and/or development permit applications.
- Both Ontario and British Columbia have seen a softening in zoning by-law amendment applications, which represent an early staging point in the development process. Ontario saw applications falling from 466 application to 324 or -30.5% between 2022 to 2023 and British Columbia saw a decrease from 363 applications to 306 or -15.7% over the same period.
- For site plan and development permits, which typically represent the last stage in the planning process before a building permit is issued, Ontario saw a large drop from 792 applications in 2022 to 488 in 2023 or a decrease of 38.4%, while British Columbia saw a drop from 1,511 to 1,452 application or -3.9% over the same time period.
- In contrast, more affordable markets, such as Alberta, have experienced an increase in application submissions. Alberta saw a 17.7% increase in development permits between

2022 to 2023, with applications rising from 487 to 573. Alberta saw an increase in rezoning applications from 380 in 2022 to 485 in 2023 or 27.6%.

- The contrast in submission trends between more administratively burdensome markets and those that are less so, indicates that more than the economic backdrop and high interest rates are impacting future development intentions.

Figure ES- 7



**Takeaway #6:** Approval timelines improved marginally from the previous study, but remain high.

It took an average application 11.2 months to complete in the 2022-2024 study period, down 2.1 months from the time of the last study.

Some regional highlights include:

- The average timeline ranged from 2 months in Saskatoon to 31 months in Hamilton;
- 13 municipalities have better timelines than reported in the 2022 study, 5 have the same, and 4 are worse;
- The municipality that saw the best improvement in timelines was Halifax with a decrease of 11 months, and the municipality that saw the worst deterioration in timelines was Hamilton with an increase of 8.1 months.
- Lower application submissions in Ontario and BC coupled with a less disruptive work environment with the end of the pandemic meant that municipalities had more resources and focus for existing applications during the current period this study examined compared to the previous 2022 study. Improvements in timelines were expected, however, improvements are modest at 2.1 months overall.



- The bottom 5 municipalities for average timelines are all located in Ontario, while the top 5 municipalities with the fastest timelines are located in the Prairies or Atlantic Canada.

Figure ES- 8

Average Timeline Comparison, by Study Municipality, 2022 & 2024					
Rank	Municipality	2022 Study	2024 Study	Trend in Time	
		Months	Months	Difference	Change
1	Saskatoon	4.1	2.0	(2.1)	Better
2	Moncton	n.d	2.4	n.d	n.d
3	Regina	4.2	3.2	(1.0)	Better
4	Edmonton <sup>1</sup>	10.5	3.4	(7.1)	Better
5	Charlottetown	3.4	3.5	0.1	Same
6	Calgary <sup>1</sup>	5.4	4.2	(1.1)	Better
7	London	10.1	4.6	(5.6)	Better
8	Kelowna <sup>3</sup>	5.7	5.8	0.1	Same
9	Surrey	13.8	5.9	(7.9)	Better
10	Kamloops <sup>3</sup>	9.1	6.9	(2.1)	Better
11	Vancouver	15.2	7.7	(7.5)	Better
12	St. John's	9.4	8.6	(0.9)	Same
13	Halifax	20.8	9.8	(11.0)	Better
14	Winnipeg	5.0	10.1	5.1	Worse
15	Oakville	13.9	14.1	0.2	Same
16	Brampton <sup>1</sup>	19.1	14.1	(5.0)	Better
17	Burnaby	20.9	15.9	(5.0)	Better
18	Ottawa <sup>1</sup>	13.0	16.9	3.9	Worse
19	Pickering <sup>1</sup>	20.7	17.3	(3.4)	Better
20	Markham	23.5	22.6	(0.9)	Same
21	Bradford West Gwillimbur	20.4	23.5	3.1	Worse
22	Toronto	32.0	25.0	(7.0)	Better
23	Hamilton	22.9	31.0	8.1	Worse
<b>Average<sup>2</sup></b>		<b>13.8</b>	<b>11.6</b>	<b>(2.1)</b>	<b>Better</b>

	Municipalities	Percent
Municipalities with <b>Better</b> Timelines	13	59%
Municipalities with <b>Same</b> Timelines	5	23%
Municipalities with <b>Worse</b> Timelines	4	18%
<b>Total</b>	<b>22</b>	<b>100%</b>

<sup>1</sup> 2022 average timelines are based on municipally reported data found in Figure 37 of 2022 Canada MBS  
<sup>2</sup> Total averages are based on average of all averages  
<sup>3</sup> Kelowna, Kamloops, 2022 averages are taken from associate British Columbia Benchmarking Study  
Note: Moncton is excluded from the 2024 total average to mirror it's exclusions from 2022 due to no data (n.d) availability  
Source: Altus Group Economic Consulting

**Takeaway #7:** *The Indirect costs of the development application process can add \$23,642 to \$1.4 million to the price of a house*

- Developers face indirect costs throughout the application process. These costs include: annual property taxes paid on vacant land, cost escalation and opportunity cost of holding land vacant;
- Indirect costs can add between \$10,000 in the City of Toronto and \$2,200 in Moncton per month, per unit, to the cost of producing housing in a low-rise development; and

- Indirect costs can add between \$1,174 (in Moncton) and \$6,855 (Vancouver) per month, per unit, to the cost of producing housing in a high-rise development.

**Takeaway #8:** *Municipalities that rank the lowest, also have worse housing outcomes*

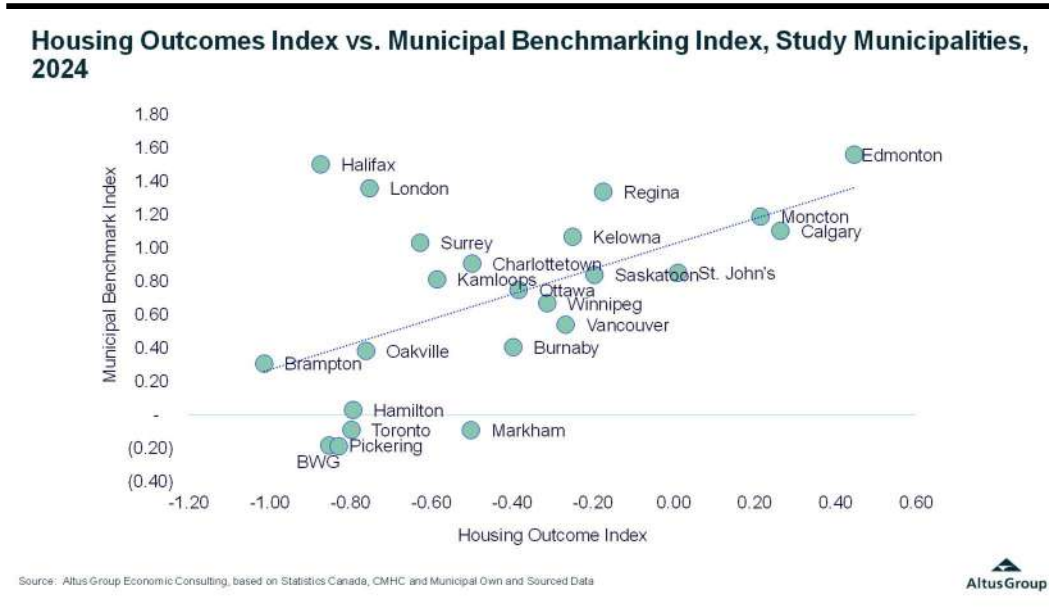
All municipalities have had significant difficulties ramping up housing production to keep pace with accelerating population growth experienced in the past few years.

As a result, housing affordability, for both ownership and rental, has deteriorated to its worst level since the mid-1990s.

Rental vacancy rates are the lowest they have ever been in 6 of the 23 municipalities studied.

Figure ES-9 shows that these housing issues (affordability and availability of housing, degree of suppressed households and share of the population leaving for more affordable markets) are significantly more pronounced for municipalities that rank low in our benchmark analysis.

Figure ES- 9



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## INTRODUCTION

### *BACKGROUND & SCOPE OF STUDY*

Altus Group Economic Consulting was retained by the Canadian Home Builders' Association ("CHBA") to undertake a Canadian Municipal Benchmarking Study ("Canada MBS"), a look at several municipal land-use planning policy-related factors that may be contributing to worsening housing affordability in 23 major markets in Canada. This report is the 3rd edition in series of reports, previously published in September 2020 (1st edition) and October 2022 (2nd edition).

The Canadian MBS has been done in conjunction with The Greater Toronto Area Municipal Benchmarking Study - a companion report sponsored by the Building Industry and Land Development Association ("BILD"). That Study was released in September 2024 and covers 16 municipalities in the GTA, only five of which overlap with this study.

This study provides data on how the 23 cities are performing based on:

- Population and new home building trends.
- The municipal benchmark ranking. This is a measure of each municipality's performance on:
  - **Approval timelines:** The average length of time it takes an application for a residential development to go through the approval process. The study reviews application timelines for each application type;
  - **Municipal charges and fees levied on new residential development:** To estimate the direct costs that municipalities levy on new housing developments, costs which are ultimately passed on to new home buyers (or renters) through higher prices (or rents) using two hypothetical development scenarios; and
  - **Planning features:** Analysis of municipal features and tools used to facilitate more efficient and transparent development processes.
- A review of how the structures of provincial and municipal planning systems, as well as tools used by municipalities to implement provincial planning directives may impact the cost and availability of housing for young families.



The study looks at the planning processes in a total of 23 municipalities in Canada, which includes:

Region	Area Municipality
<b>British Columbia</b>	Vancouver, Burnaby, Surrey, Kelowna, Kamloops
<b>Prairies</b>	Calgary, Edmonton, Regina, Saskatoon, Winnipeg
<b>Ontario</b>	Toronto, Oakville, Brampton, Markham, Pickering, Bradford West Gwillimbury, London, Ottawa, Hamilton
<b>Atlantic Canada</b>	Halifax, Charlottetown, Moncton, St. John's

***BENEFITS OF THIS STUDY***

The key benefit of this report is that it provides one of the only peer-to-peer analysis of planning outcomes across major markets in Canada, across time.

This study provides a data-driven approach to measuring how land-use planning-related factors influence the supply of housing, including the length of time the municipal approval processes can add to the construction timeline and how government charges on development applications can contribute to the cost of housing.

The study is also an opportunity share knowledge of best practices in planning with the general public, practitioners and policy-makers. Its an opportunity to focus on remaining gaps in policy and processes that all parties in the homebuilding process will need to work together to solve.

Since the release of the first edition of this study in 2020, many municipalities have adopted more regular internal and external self-reporting analysis of key performance indicators (“KPIs”) related to planning decision making.

This edition brings an additional element of tracking success. The first edition was completed in early 2020, just before the COVID-19 pandemic lockdowns began in March 2020. The 2nd edition reviewed the development process through the pandemic and resulting lockdowns (spring 2020 to summer 2022), being completed at the time lock-downs were mostly lifted.

The pandemic was a highly disruptive event that affected the way and where people work. This 3rd edition will help us understand how these structural changes have impacted the development application processes across Canada. This report represents a ‘return to a new normal’ examination.

The pandemic also shone a light on the importance in tackling the housing crisis in Canada and policymakers at all levels of government are paying more attention to it, introducing a wave of policy changes to address its key issues. This report is an opportunity to assess how these changes are working.

### ***DISCLAIMER & CAVETS***

This report does not include municipalities in Quebec, as the CHBA’s jurisdiction does not include the Province of Quebec.

The information presented in this report is based on interpretation of various municipal policies, such as by-laws, council and committee meeting minutes and rate schedules. While every effort has been made to interpret these materials accurately, there can be no certainty that municipal stakeholders will apply their policies and rates in the same manner as interpreted in this study.

The models at the core of this report frequently rely upon inputs and assumptions, such as application dates and timelines, assumed land values, estimated housing prices, and development yields from hypothetical development sites. These inputs and assumptions are intended for the purposes contained herein, and should not be used for any other purposes, or relied upon in any manner other than how they are used within this report.

The data presented in this report is based on the latest data available as of the writing of the report (spring, summer and fall of 2024). Given the types of data used, the most recent iteration of data may vary from one chart, table, or figure to the next. As well, it is likely that by the time of this reports publishing, factors that are were analyzed, such as municipal websites, rate sheets, housing construction statistics, etc. may have changed.

### ***PARTNERSHIP ENGAGEMENT ACKNOWLEDGEMENT***

The biggest change since the prior two additions of this study is access to municipal-owned data. Previous studies relied on data collected by Altus Group, based on an intensive search for a sample of development application data.

This time, all best efforts were made to collect data directly from municipalities, including outreach to mayor’s offices, Chief Administration Officers (‘CAOs’), and other senior staff executives responsible for planning approvals, such as the Director of Planning and Commissioner or Chief Planner. Of the 23 municipalities studied, 18 provided information to help support the research outlined in this report, which included:

1. Providing application-level data for decisions rendered between July 2022 and May 2024 for 'typical residential projects' (this is further explained in Section 4 of the report that deals with application timelines);
2. Providing topline submission numbers for all applications between 2018 to year-to-date May 2024. Where possible the information was requested to be provided with a monthly breakdown, however, given the administrative burden that this represented for some organizations, yearly totals were also accepted; and
3. List of achievements that the municipality thought was worthy of being highlighted. This could include structural changes – e.g. zoning reform – or more process-oriented changes – setting up continuous improvement processes, re-structure teams or departments – etc. As well, changes could have either an on-going or completed status.

The vast majority of municipal organizations and their staff contacted had a generally positive to strong desire to engage with this study. There was a noted improvement in both response rates and disposition towards engagement compared to previous outreach efforts.

While most municipalities exhibited good will towards the development of this report, it is acknowledged that many had reasonable hinderances that affected their ability to fully participate. Cited reasons listed by frequency of occurrence included:

- Lack of available staff resources, with common reasoning around vacation schedules as the participation request was made during a period of common absences;
- Lack of sufficient notice for the data request - approximately 4 to 6 weeks of notice was provided before the established due date, with significant extensions provided to municipalities in many cases;
- Administrative burden from the complexity of the data request, which often required manual transformation of internal-system data;
- Lack of data availability; and
- Lack of remuneration of staff resources that would be used<sup>1</sup>

Nevertheless, the vast majority of municipal organizations were able to overcome these obstacles and engage with this study. The researchers of this report want to provide a note of appreciation to all the organizations and staff members that helped facilitate the data and information requests. It's our hope that planning practitioners in both the public and private sectors find beneficial uses from the analysis provided in this report.

<sup>1</sup> Municipalities were not remunerated in any way for the data provided, which was only given through voluntary efforts

## POPULATION AND NEW HOMEBUILDING TRENDS

Population growth has exploded largely due to increased international migration since the time of the last edition of the Canadian MBS in 2022. All municipalities studied have had to accommodate a record number of new people. One consequence has been that housing affordability, for both ownership and rental, has worsened.

### ALL CITIES ARE COPING WITH RAPID POPULATION GROWTH

Figure 1 (A and B) highlights trends in population growth in Canada and the municipalities the study municipalities in this report. Figure 1 A shows population change per year, by select time periods.

A population grows through the following ways each year:

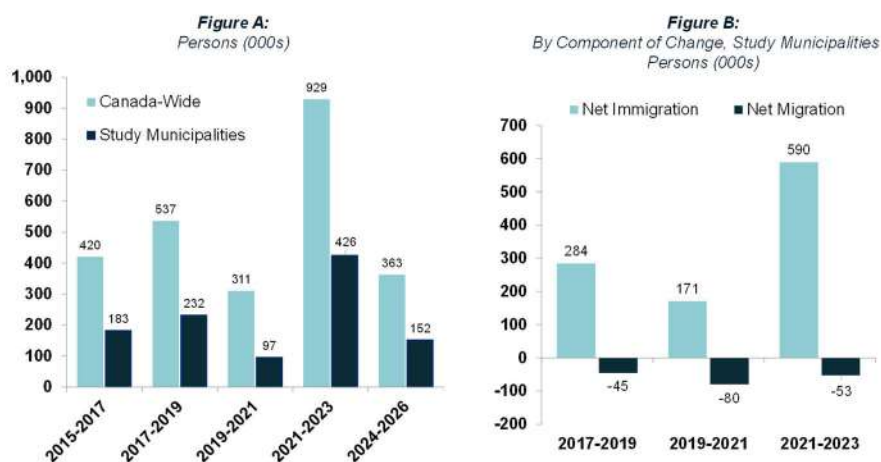
- Births, net of deaths
- Net immigration – persons coming to Canada both on a temporary and permanent basis, net of those leaving Canada; and
- Persons moving for other cities in the same province (net intra-provincial migration) or other provinces (net inter-provincial migration).

Figure 1 B shows key components of population growth for the study municipalities – net migration (inter and intra-provincial) and immigration.

The figures show that the pandemic put a pause on population growth in Canada as immigration flows dropped significantly. Population growth in the study municipalities was further dragged down by an increase in residents leaving for other markets in Canada (Figure B).

Figure 1

Average Annual Change in Population, Canada and Study Municipalities, 2017-2023





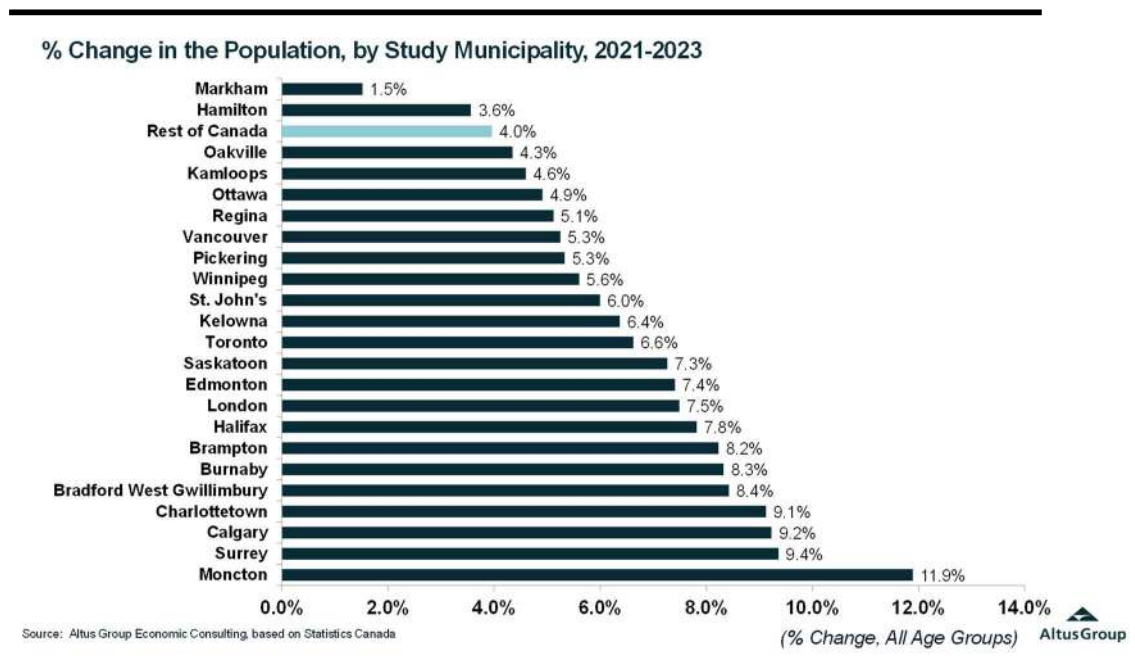
Since the time of the last report, immigration has bounced back significantly.

Canada has grown by almost 400,000 more persons per year between 2021 and 2023 when compared to pre-pandemic years. Even as the Study Municipalities continue to lose residents at a rapid pace to more affordable places in Canada, they were still growing by almost 200,000 more persons per year, combined, during this time.

The Canadian government has committed to slowing population growth through lowering their immigration targets in the 2025-2027 period and reducing the number of non-permanent residents in Canada. On a two-year basis, this will bring population growth back down to pandemic levels.

Figure 2 shows population growth by city between 2021 and 2023. All study municipalities in this report grew significantly faster than the rest of Canada during this period, with the exception of Markham and Hamilton. The fastest growing cities are the ones with more affordable housing, with some exceptions.

Figure 2



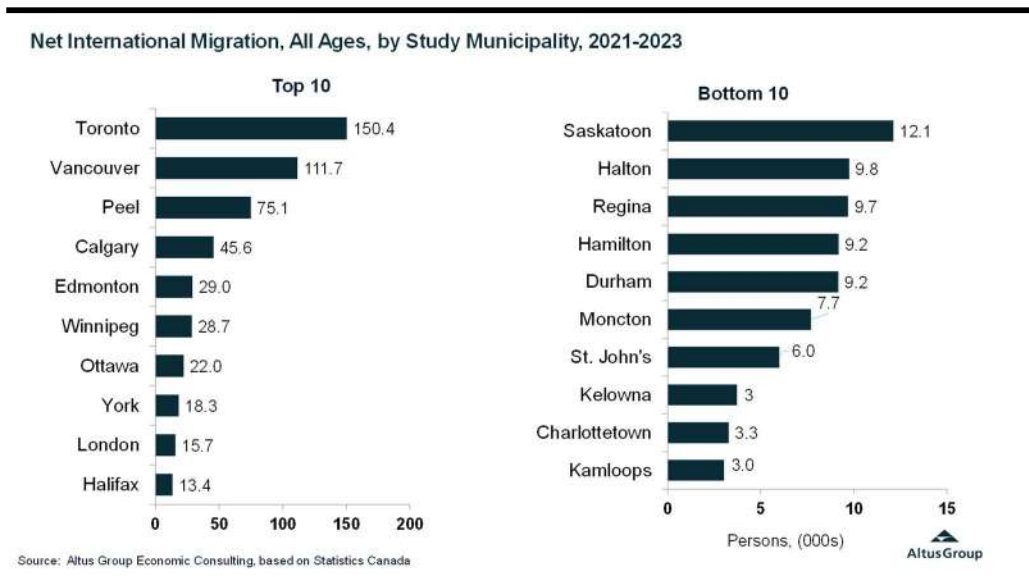
### YOUNG FAMILIES FAVOUR MORE AFFORDABLE CITIES

With population set to slow, all cities in Canada will have to compete more vigorously for population growth.

Figure 3 shows net immigration and internal migration (intra and interprovincial migration combined) by census divisions of the study municipalities. Data on migration trends does not exist for census subdivisions in Canada.

All municipalities accommodated a record number of immigration between 2021 and 2023. Toronto, Vancouver and Peel were the top three destinations for immigration between 2021 and 2023. Vancouver overtook Peel for second spot since the time of the last study.

Figure 3



In contrast, Toronto, Peel and Vancouver were also the cities that lost the largest population through net out-migration of residents to other cities between 2021 and 2023 (Figure 4, next page). These cities experienced the largest out-migration on record since 2001 and are most likely to experience a decline in population in the next two-year period.

Figure 5 on the next page further shows migration patterns for those 25-44 and already living in Canada. The top 3 cities for those aged 25-44 were Calgary, Durham and Simcoe. Meanwhile, Toronto, Peel and Winnipeg lost the most population of this age group in the last two-year period.

Figure 4

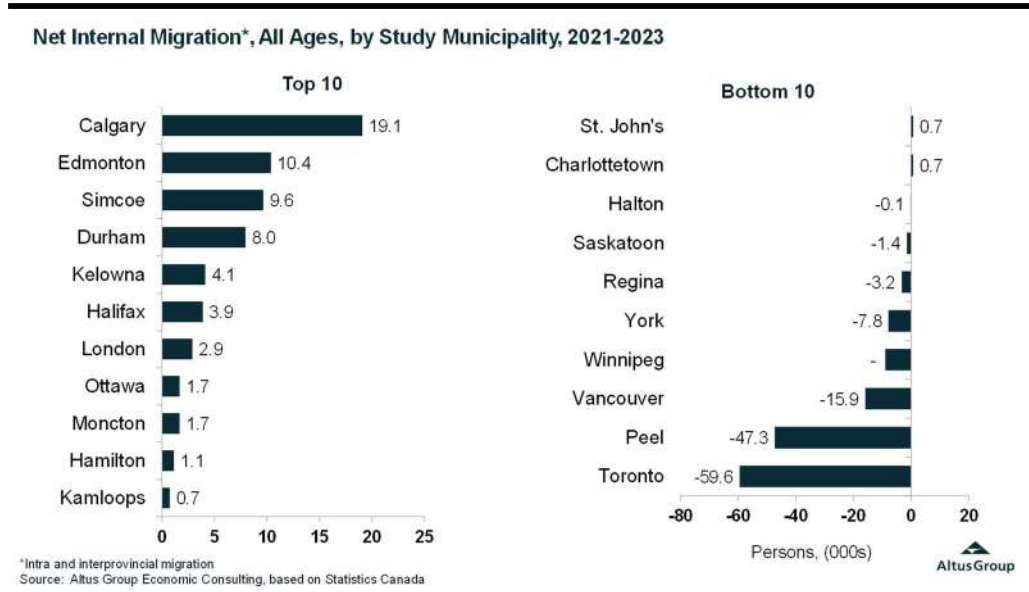
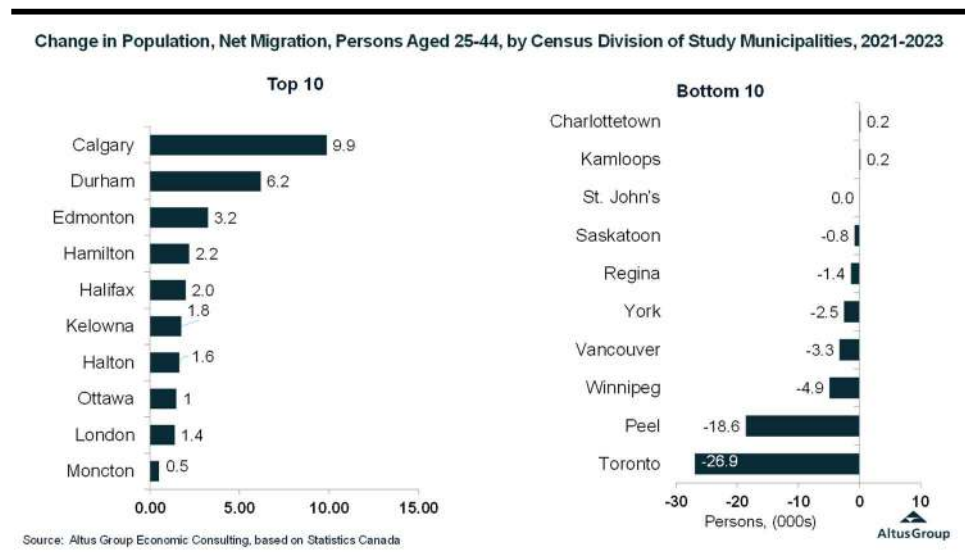


Figure 5



**HOUSING COSTS PUSH PEOPLE OUT OF THE GTA AND VANCOUVER**

Housing affordability for both the rental and ownership market has worsened since the time of each of the last two editions of this study across all municipalities (Figure 6). The average rent-to-income ratio is the highest it's been since 2001 for all municipalities studied.

Western municipalities have the worst affordability in the rental market, when compared to other cities in Canada.

In contrast, the homeownership market in Ontario municipalities combined were the most expensive across Canada. An average income-earning household would have to devote over half of their income to meeting mortgage payments when purchasing an average priced home, an all time high.

Figure 6

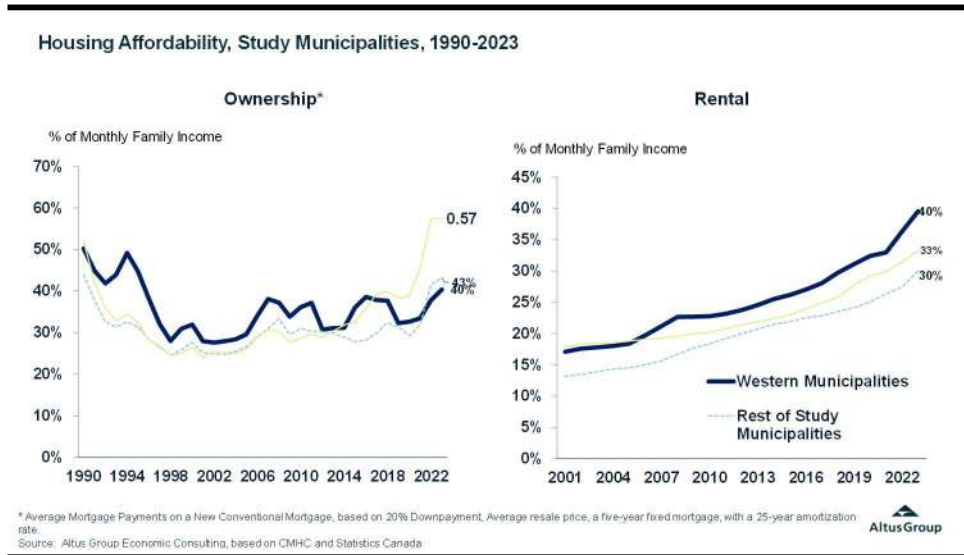
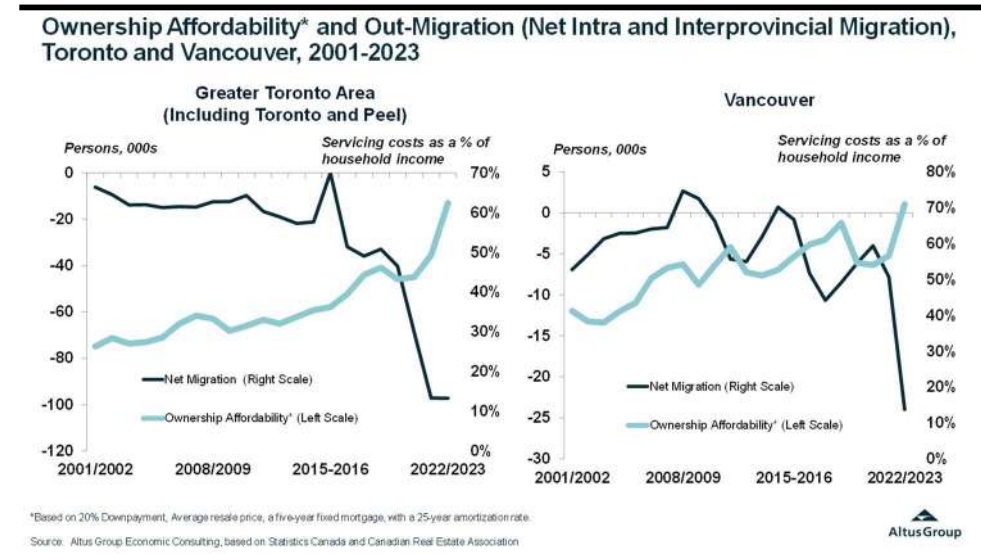


Figure 7 shows that there is a link between ownership affordability and the number of persons leaving a Toronto and Vancouver. Worsening affordability is what has driven people out of the Greater Toronto Area and Vancouver.

Figure 7





## HOUSING CONSTRUCTION NOT KEEPING UP WITH POPULATION

Figure 8 looks at housing starts in Canada versus population growth. This analysis focuses on Canada-wide data in order to provide a longer-term picture. The number of new units for which constructed started for every new person added to the population in the 2012-2021 period was the lowest it's been since the data began in 1972. Even accounting for a reduction in population growth in 2025 and 2026, that gap is widening in the 2022-2027 period, barring an increase in housing starts. Canada is building fewer homes to accommodate population growth than it has than ever before.

Figure 9 shows new home construction for the study municipalities combined from 2002-2023.

Figure 8

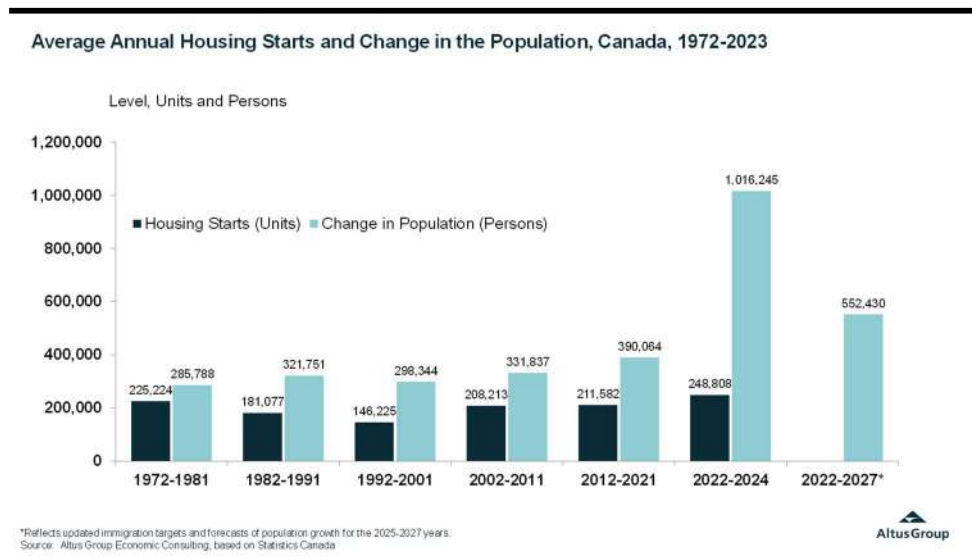
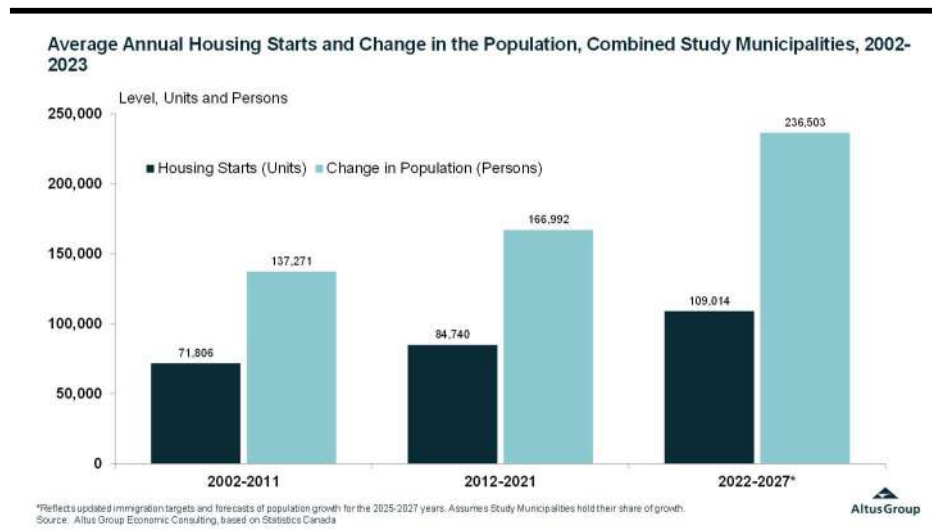


Figure 9



The figure shows that housing starts have picked up since the time of each of the last two studies. However, the figure shows that the gap between population growth and housing starts has widened over this period.

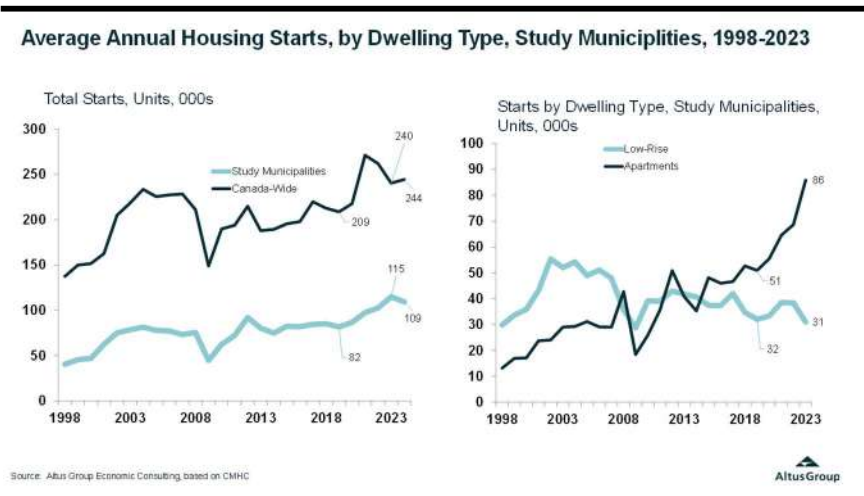
Figure 10 benchmarks growth in housing starts by municipality relative to population growth. The figure demonstrates that every city had produced fewer housing starts per person in the 2021-2023 period than has historically been the case, with few exceptions.

Figure 10



While housing starts have risen since the time of the last report, the growth has solely been in apartment starts. Low-rise developments continued to decline as a share of overall housing starts. Low rise starts accounted for just 31% of total residential development between 2022 and 2024, compared to 38% between 2019 and 2021, and 44% between 2016 and 2018. The 2022 MBS noted that markets with a high share of apartment development, also tend to be more expensive.

Figure 11



## MUNICIPAL BENCHMARK RESULTS

This section summarizes the municipal benchmarking results. The municipalities studied in this report were ranked on:

- **Approval Timelines:** The average length of time it takes an application for a residential development to go through the approval process. The study reviews application timelines for each application type;
- **Municipal Fees:** Including infrastructure-related charges levied on new developments and the fees imposed to review planning applications; and
- **Planning Features:** Analysis of municipal features and tools used to facilitate more efficient and transparent development processes.

### APPLICATION APPROVAL TIMELINES

This section reviews findings from research into application submissions between Jan 2018-May 2024 and approvals from July 2022 (first month of review after the last edition ended) to May 2024.

#### Approach

Much of the data used in this study was provided by the municipalities themselves, while prior editions had relied on a sample of development applications. This enables the production of several unique insights that have not been previously provided.

Application submissions are generally where a development proposal formally begins within the planning process. This study considers submissions once the application is deemed complete, meaning it meets all the study requirements laid out by the municipality. There is often a back-and forth process from when a submission is originally made to the municipality and the application is deemed complete. This study does not capture this process.

An application approval does not necessarily mean a development is ‘shovel ready’ as the approval in question may simply be for a single step in a multi-step/application process before a building permit can be granted.

This study also only focuses on a municipal approval. In some instances, a municipality may reject an application, but the applicant may still receive an approval through a judicial or quasi-judicial path (e.g. Ontario Land Tribunal – “OLT”, Manitoba Municipal Board, etc.) As well, municipalities are not the only authority that may grant an approval from the outset, with provinces having development approval granting powers as well. This study does not capture this process, which can add years to an application timeline.

Explanations about data management are provided in Appendix A, along with a description of planning nomenclature and terminology across Canada and the meaning of terms used in the proceeding analysis.

## Application Submissions

The data provided for submission totals includes both residential and non-residential applications. Although the purpose of this study is to focus on residential development, municipalities were asked to provide a single total for both types of development for two main reasons:

1. To minimize the administrative burden of the request; and
2. To better understand the sum total of development application activity that is occurring.

As the analysis in this study is examining total in-take, solely looking at residential submission totals would understate the amount of work that municipal planning departments deal with and therefore overstate any potential processing capacity.

For context, based on the data from a small number of municipalities that included both residential and non-residential information in their application specific data submissions, non-residential applications may make-up between a quarter to a third of all applications some municipalities receive.

Figure 12 provides the totals by year for zoning by-law and site plan/development permit applications for municipalities within the study located in Ontario, British Columbia and Alberta between 2018 to 2023.

These application types were chosen because the data available for them was the most consistent between the municipalities being examined, as well they represent both early-stage and late-stage points within the development application process.

Rezoning represents an early-stage application where authorization of a use (e.g. apartment building, townhouses, etc.) and various factors that affect feasibility such as height, density, etc. must be approved before later stage considerations are finalized. Site plans/development permits are considered a late-stage application that is only applied for once municipal plan amendments, rezonings, parcel subdivision and other planning considerations have been completed, and generally deals with physical structural issues such as where a driveway may intersect a road, where windows are placed in relation to other nearby buildings, etc. Typically, a site

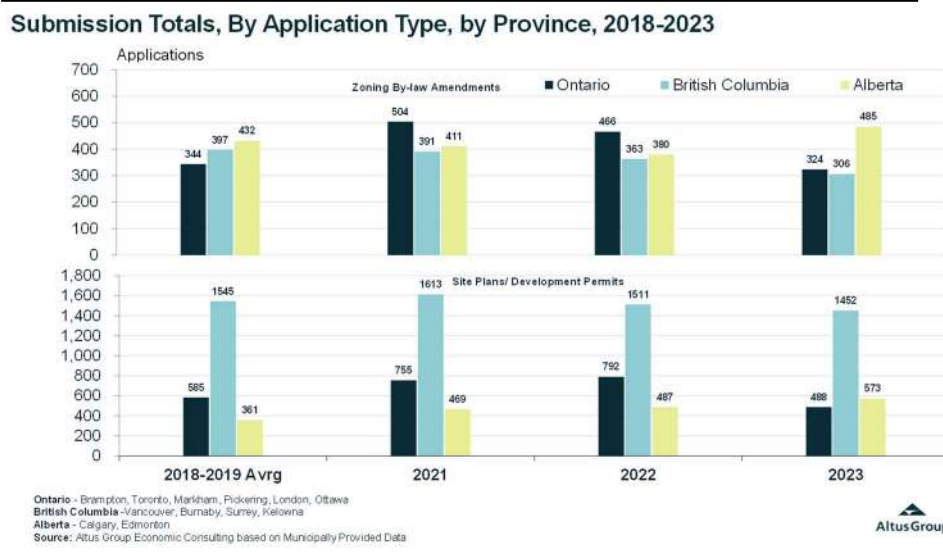
plan/development permit is the last application approval before a building permit is issued<sup>2</sup> and ‘shovels are in the ground’.

While other municipalities did provide application ‘top line’ numbers, the information they provided either did not provide sufficient consistency to make possible comparison with other jurisdictions, or neighbouring municipalities did not provide adequate data and therefore regional or provincial aggregations could not be constructed.

Both Ontario and British Columbia saw a softening in rezoning applications, with Ontario seeing applications fall from 466 application to 324, or -30.5%, between 2022 to 2023 and 363 applications to 306, or -15.7%, for British Columbia. In contrast, Alberta saw an increase in rezoning applications from 380 in 2022 to 485 in 2023 or 27.6%.

For site plan and development permits, Ontario saw a large drop from 792 applications in 2022 to 488 in 2023 or a decrease of 38.4%, while British Columbia saw a drop from 1,511 to 1,452 application or -3.9% over the same time period. Alberta saw a 17.7% increase in development permits between 2022 to 2023, with applications rising from 487 to 573.

Figure 12



<sup>2</sup> In some jurisdictions building permits and development permits are applied for and approved concurrently.

As submission totals are based on simple totals of applications and are not quality adjusted based on unit counts or gross floor area, caution should be taken when considering results below a 10% threshold.

The outlook in Ontario's planning application process signals concerning trends around the availability of future approvals to support both short-term and long-term housing supply goals. British Columbia also shows some signs for concern, however, significantly less so than Ontario, with development permits largely holding up their pace between 2022 and 2023. Alberta shows signs that the planning application approvals are being sought after by homebuilders, particularly for development permits that are closest to building permits and the physical start of construction.

## Approval Timeline Analysis

For this iteration of the study, the timeline analysis primarily relies on municipally-provided application data given to Altus Group by 17 of the 23 (73%) municipalities within the scope of the study.

Five municipalities - Winnipeg, Kamloops, St. John's, Oakville, Hamilton and Bradford West Gwillimbury ("BWG") - did not provide any application related data. Replicating the methods used in previous editions of the study of searching public records<sup>3</sup>, Altus Group was able to create a subsample dataset for planning application approval timelines for the missing municipalities using various forms of public records. Otherwise, all data presented in this section is as reported by municipalities themselves. Augmentations were made to the datasets provided generally for data hygiene and integrity reasons.

Approval timelines were measured (where possible) from the date a municipality provided acknowledgement that an application was deemed complete to when a planning approval was provided by the municipality. The nature of the 'planning approval' can take many forms – and may include some combination of a municipal plan amendment, zoning by-law amendment, plan of subdivision and/or site plan/development permits.

In some jurisdictions, such as Saskatoon, Regina, and others, development permits are also applied for and approved concurrently with building permits, which is considered a construction permit and not a planning application, so is therefore omitted from analysis in this section.

As this report compares municipalities in multiple provinces with varying legislation around the application submission and approval process, having a unified definition for a 'complete application date' or 'submission date' outside of Ontario is not possible to develop without collective efforts on the part of governmental authorities to organize such an endeavour. As

<sup>3</sup> Meeting minutes, staff reports, open data, etc. See 2022 Municipal Benchmarking Study for more information on subsample dataset creation.



with past studies, where a specific ‘complete application’ date could not be verified with the materials in public records, or made available by the municipality, Altus Group chose a date that necessarily came after that date as a conservative proxy (e.g., date of first public meeting or notice date, etc.).

For municipally provided data, municipalities were instructed to provide submission dates based on their best interpretation for when an application began that reflects as closely as possible to the applicant experience that their data records allow for – e.g. when the application began circulation, fees were paid, first meeting, etc.

The purpose of this study is to provide the best possible insights into ‘actual’ application timelines for a ‘typical’ residential project. It has been emphasized in discussions with municipal staff that while manipulating the timeline accounting system may make municipalities appear to be achieving greater strides than in reality, ultimately this does not result in a benefit to an applicant in terms of improved predictability, lower risk, or reduced costs that can be translated into more homes being built faster.

While a note of appreciation is provided to the municipal staff that were involved in assisting with data collection, it is critical that more be done to improve data availability and transparency in Canada in planning outcomes to provide the public, homebuilder stakeholders, executives of municipal organizations, and decision-making authorities the most accurate information and deepest set of analysis wherever possible.

Overall, this iteration of the study relies on 5,232 applications, which is approximately four-to-five-times the number of observations that were available for the timeline analysis in the 2020 and 2022 studies.

Figure 13 provides the estimated average approval timelines by application type by municipality and region, between summer 2022 to spring 2024. The average timeline for all application types in all municipalities within this study is 11.2 months. Municipalities with the shortest averages are in the Prairies at 4.6 months on average, while the region with the longest average is Ontario at 18.8 months.

The municipality with the fastest weighted average timeline is Saskatoon at 2.0 months, while the municipality with the longest timeline is Hamilton at 31.0 months. The bottom five municipalities with the longest timelines are all from Ontario, while the top 5 municipalities are from either the Prairies or Maritimes.

Figure 13

**Estimated Average Approval Timelines, by Application Type, by Municipality and Region, 2022-2024**

Rank	Municipality/Region	Municipal Plan Amendment	Zoning By-law Amendment	Plan of Condominium/Strata	Plan of Subdivision	Site Plan/Development Permit	Weighted Average	Total Sample
		Months						Observations <sup>2</sup>
1	Saskatoon, PR	7.6	6.2	1.8	1.0	1.6	2.0	n=213
2	Moncton, AC	5.6	3.9	**	2.7	1.3	2.4	n=192
3	Regina, PR	5.5	4.2	0.4	**	3.1	3.2	n=138
4	Edmonton, PR	6.4	5.1	2.9	3.6	2.5	3.4	n=840
5	Charlottetown, AC	4.6	3.6	**	**	2.4	3.5	n=17
6	Calgary, PR	5.8	5.4	1.0	3.0	5.3	4.2	n=1,337
7	London, ON	6.0	5.5	5.4	17.8	1.0	4.6	n=96
8	Kelowna, BC	10.4	9.0	**	3.6	4.7	5.8	n=160
9	Surrey, BC	5.8	5.9	**	5.8	6.0	5.9	n=541
10	Kamloops, BC <sup>1</sup>	**	9.2	**	**	6.0	6.9	n=213
11	Vancouver, BC	13.7	13.7	**	13.1	2.9	7.7	n=465
12	St. John's, AC <sup>1</sup>	9.6	8.1	**	**	**	8.6	n=10
13	Halifax, AC	28.9	17.9	**	**	3.9	9.8	n=66
14	Winnipeg, PR <sup>1</sup>	7.1	9.9	**	10.6	**	10.1	n=96
15	Oakville, ON <sup>1</sup>	6.0	17.8	5.2	18.3	**	14.1	n=22
16	Brampton, ON	14.2	13.1	9.4	12.6	21.4	14.1	n=46
18	Burnaby, BC	**	15.9	**	**	**	15.9	n=26
17	Ottawa, ON	12.1	16.4	7.8	20.9	19.4	16.9	n=213
19	Pickering, ON	20.8	21.0	10.3	22.8	17.3	17.3	n=28
20	Markham, ON	32.1	28.0	8.0	20.8	20.0	22.6	n=109
21	BWG, ON <sup>1</sup>	**	23.5	**	**	**	23.5	n=2
22	Toronto, ON	21.1	22.9	18.7	87.3	30.2	25.0	n=601
23	Hamilton, ON <sup>1</sup>	27.4	28.0	**	49.3	**	31.0	n=27
<b>1</b>	<b>Prairies Average</b>	<b>6.5</b>	<b>6.2</b>	<b>1.5</b>	<b>4.5</b>	<b>3.1</b>	<b>4.6</b>	<b>n=2,624</b>
<b>2</b>	<b>Atlantic Canada Average</b>	<b>12.2</b>	<b>8.4</b>	<b>**</b>	<b>2.7</b>	<b>2.5</b>	<b>6.1</b>	<b>n=285</b>
<b>3</b>	<b>British Columbia Average</b>	<b>10.0</b>	<b>10.7</b>	<b>**</b>	<b>7.5</b>	<b>4.9</b>	<b>8.4</b>	<b>n=1,1179</b>
<b>4</b>	<b>Ontario Average</b>	<b>17.5</b>	<b>19.6</b>	<b>9.3</b>	<b>31.2</b>	<b>18.2</b>	<b>18.8</b>	<b>n=1,144</b>
<b>Average of All Municipalities</b>		<b>12.5</b>	<b>12.8</b>	<b>6.4</b>	<b>18.3</b>	<b>8.8</b>	<b>11.2</b>	<b>n=5,2322</b>

<sup>1</sup> Based on data gathered through public records  
Note: Total Sample Composed of 9% Municipal Plan Amendments, 27% Zoning By-law Amendments, 39% Site Plan/Development Permits, 11% Plans of Condominium/Strata, 14% Plans of Subdivision  
Source: Altus Group Economic Consulting based on Municipal Data and Public Records

Figure 14 provides a timeline comparison between the 2022 and 2024 studies. There are four important notes to be aware of regarding this figure.

1. Where the timeline difference was less than a month a municipality is rated as being the 'same' as the margin is too low to be considered statistically significant;
2. Timelines for Edmonton, Calgary, Brampton, Ottawa, and Pickering were replaced with data provided by the municipality for that study period. The purpose of this is to provide greater consistency between data sources used between the two studies;
3. Reported timelines for 2022 for Kamloops and Kelowna are based on data collected for the 2022 BC MBS associate study, which provided an aggregate total timeline for the province. As a result, the total average for 2022 was readjusted to account for Kamloops and Kelowna and does not match the reported average in the 2022 Canada MBS; and

- Although listed in the chart, the 2024 average does not include Moncton to be consistent with 2022 for comparison purposes. No data on timeline was available in 2022 for that municipality.

Figure 14

Average Timeline Comparison, by Study Municipality, 2022 & 2024					
Rank	Municipality	2022 Study	2024 Study	Trend in Time	
		Months	Months	Difference	Change
1	Saskatoon	4.1	2.0	(2.1)	Better
2	Moncton	n.d	2.4	n.d	n.d
3	Regina	4.2	3.2	(1.0)	Better
4	Edmonton <sup>1</sup>	10.5	3.4	(7.1)	Better
5	Charlottetown	3.4	3.5	0.1	Same
6	Calgary <sup>1</sup>	5.4	4.2	(1.1)	Better
7	London	10.1	4.6	(5.6)	Better
8	Kelowna <sup>3</sup>	5.7	5.8	0.1	Same
9	Surrey	13.8	5.9	(7.9)	Better
10	Kamloops <sup>3</sup>	9.1	6.9	(2.1)	Better
11	Vancouver	15.2	7.7	(7.5)	Better
12	St. John's	9.4	8.6	(0.9)	Same
13	Halifax	20.8	9.8	(11.0)	Better
14	Winnipeg	5.0	10.1	5.1	Worse
15	Oakville	13.9	14.1	0.2	Same
16	Brampton <sup>1</sup>	19.1	14.1	(5.0)	Better
17	Burnaby	20.9	15.9	(5.0)	Better
18	Ottawa <sup>1</sup>	13.0	16.9	3.9	Worse
19	Pickering <sup>1</sup>	20.7	17.3	(3.4)	Better
20	Markham	23.5	22.6	(0.9)	Same
21	Bradford West Gwillimbur,	20.4	23.5	3.1	Worse
22	Toronto	32.0	25.0	(7.0)	Better
23	Hamilton	22.9	31.0	8.1	Worse
<b>Average<sup>2</sup></b>		<b>13.8</b>	<b>11.6</b>	<b>(2.1)</b>	<b>Better</b>

	Municipalities	Percent
Municipalities with <b>Better</b> Timelines	13	59%
Municipalities with <b>Same</b> Timelines	5	23%
Municipalities with <b>Worse</b> Timelines	4	18%
<b>Total</b>	<b>22</b>	<b>100%</b>

<sup>1</sup> 2022 average timelines are based on municipally reported data found in Figure 37 of 2022 Canada MBS  
<sup>2</sup> Total averages are based on average of all averages  
<sup>3</sup> Kelowna, Kamloops, 2022 averages are taken from associate British Columbia Benchmarking Study  
Note: Moncton is excluded from the 2024 total average to mirror its exclusions from 2022 due to no data (n.d) availability  
Source: Altus Group Economic Consulting

The municipality that saw the greatest improvement in timelines was Halifax with a decrease of 11 months on average, and the municipality that saw the worst deterioration in timelines was Hamilton with an increase of 8.1 months from its previously reported average.

Overall, 13 municipalities are rated as 'better' with decreases in their timelines ranging from 1.1 to 11.0 months, 5 municipalities are rated as having the same (within less than 1.0 month increase or decrease in timelines), and 4 municipalities have 'worse' timelines ranging from 3.1 to 8.1 months in increase in timelines. Overall, the average improvement between the 2022 to 2024 studies was a modest 2.1 months improvement on average national-wide.

Municipal planning staff and leaders are encouraged to examine results on an application specific basis between the 2020, 2022, and 2024 study where data is available to better understand the specific areas of improvement or deterioration they've achieved.

Municipalities that have the shortest timelines reported that most development occurs ‘as-of-right’, or as close to the concept as feasibly possible. Where rezonings do occur in these municipalities, they are typical for a discretionary approval for the proposed use, meaning the proposed use is already contemplated by the zoning by-law, however, it is not given automatic approval when a building permit is requested. More typically, housing projects require only needing a development permit, however, these municipalities generally see mostly low-rise housing being built, even in the multi-family format. Municipal plan amendments and zoning by-law amendments are rarer in these municipalities compared to their peers that see more high-rise housing built, as exhibited by the data they provided.

Most municipalities showing improvement is not unexpected. Given that the last study examined a time period during where there was both a heavy intake of new application submissions as reported in BC and Ontario, with extensive disruption to the work environment owing to the pandemic, municipal staff and councils have had a greater opportunity to focus on existing applications during the period this study examined compared to the last.

Finally, it should be acknowledged that while municipalities are typically the primary approval authority, they are not the sole party involved in review of development applications. Both provincial and federal ministries, agencies, and regulated industries like utilities, airport authorities, and railroad operators, all have commenting roles that can affect timelines. Working in municipal and homebuilder stakeholders, these entities and organizations also need to begin to provide both more transparency in their commenting timelines, as well as develop plans to address any identifiable issues.

## **MUNICIPAL CHARGES AND FEES**

This section reviews municipal fees levied by both lower and upper tier municipalities on residential development. These fees include:

- **Development charges/levies/infrastructure fees:** Fees collected on each new unit of housing to pay for growth-related infrastructure, including parks, libraries, water and wastewater infrastructure, roads, schools, transit and so on.
- **Density bonusing/community benefits charges and Parkland Dedication/cash-in-lieu:** Additional fees imposed on new developments to fund parks and other community amenities. The provinces govern how much and on what type of development a municipality can levy these charges.
- **Planning Application Fees:** Fees related to the review of design, engineering and construction drawings, as well as building permits. These fees are charged on a per application, per unit, or per square meter basis. Engineering fees are normally charged at a cost per value of construction works.

We review these fees based on two hypothetical scenarios:

### **Low-Rise Development Scenario**

- *50 single-detached units (2,500 sq. ft. each) and 75 townhouses (1,800 sq. ft. each).*
- *6.9 hectares of development combined.*
- *Engineering costs account for 10% of overall construction costs.*

### **High-Rise Development Scenario**

- 75 bachelor and 1-bedroom apartments (average sq ft. of 650) and 75 2-bedrooms (750 sq. ft.).
- 0.5 hectares of development combined.
- Engineering costs account for 10% of overall construction costs.

## **Some Highlights**

- Charges to support growth-related infrastructure investments have gone up considerably across most of the municipalities studied. Average development charges and planning fees have gone up by \$27,000 per unit for the low-rise development scenario and \$3,000 per unit for the high-rise scenario.
- Many municipalities impose far more infrastructure fees on low-rise developments than on high rise developments.
- Fees levied for growth-related infrastructure account for 80-90% of total fees levied on both development scenarios across most municipalities with the exception of Kelowna, Edmonton, Regina and Winnipeg.

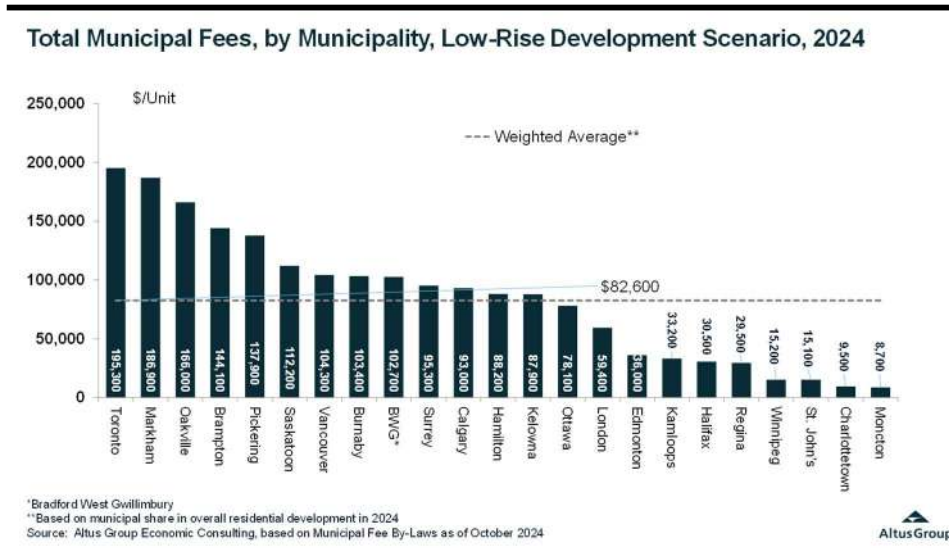
On average, total municipal fees are \$12 more per sq. ft. on a unit in a high-rise development, than in a low-rise development.

## **Total Fees Levied on Low-Rise Developments**

Figure 15 shows total fees levied on units in a low-rise development scenario by study municipality. Figure 16 shows fees broken down by growth-related infrastructure levies and planning fee applications.

On average, there are \$82,600 worth of fees levied on new low-rise residential development across Canada. Fees range from a low of \$8,700 per unit (or \$2 per Sq. ft.) in Moncton, to a high of 195,300 per unit (or \$88 per sq. ft.) in the City of Toronto. The top 5 most expensive markets are all in Ontario. The municipalities with the fewest fees are found in Atlantic Canada.

Figure 15



Total fees levied on a unit in a low-rise development have gone up by an average of \$27,500 since 2022, with the biggest increase in Burnaby (+\$73,900). Total fees fell in Regina (-\$4,900) and Winnipeg (-\$2,400). This largely reflects a drop in residential land values, and resulting decline in bonus density/land value taxes.

Figure 16

### Development Fees, New Low-Rise Residential Development, by Municipality, 2024

Municipality	Total Infrastructure Related Fees	Planning Application and Building Permit Fees	Total Fees Estimated in 2024	Total Fees Estimated in 2022	Change 2022-2024	Total Fees per Sq. Ft., 2024
	Per Unit, \$					Per Sq. Ft.
Toronto	180,300	15,000	195,300	189,300	6,000	88.0
Markham	173,700	13,200	186,900	162,300	24,600	84.2
Oakville	152,400	13,600	166,000	113,600	52,400	74.8
Brampton	137,400	6,700	144,100	126,900	17,200	64.9
Pickering	128,100	9,800	137,900	86,900	51,000	62.1
Saskatoon	108,400	3,800	112,200	71,600	40,600	50.5
Vancouver	97,400	6,900	104,300	61,400	42,900	47.0
Burnaby	93,500	9,900	103,400	29,500	73,900	46.6
BWG*	93,400	9,300	102,700	77,500	25,200	46.3
Surrey	91,800	3,500	95,300	84,700	10,600	42.9
Calgary	88,800	4,200	93,000	42,800	50,200	41.9
Hamilton	83,200	5,000	88,200	61,400	26,800	39.7
Kelowna	25,800	62,100	87,900	--	--	39.6
Ottawa	75,600	2,500	78,100	46,300	31,800	35.2
London	56,000	3,400	59,400	37,200	22,200	26.8
Edmonton	31,600	4,400	36,000	29,400	6,600	16.2
Kamloops	29,500	3,700	33,200	--	--	15.0
Halifax	28,800	1,700	30,500	9,600	20,900	13.7
Regina	22,900	6,600	29,500	34,400	(4,900)	13.3
Winnipeg	9,900	5,300	15,200	17,600	(2,400)	6.8
St. John's	11,400	3,700	15,100	4,800	10,300	6.8
Charlottetown	7,300	2,200	9,500	2,100	7,400	4.3
Moncton	5,600	3,100	8,700	3,900	4,800	3.9
<b>Maximum Value</b>	180,300	62,100	195,300	189,300	73,900	88.0
<b>Minimum Value</b>	5,600	1,700	8,700	2,100	(4,900)	3.9
<b>Weighted Average</b>	76,600	6,000	82,600	53,900	27,500	37.2

Notes: \*Bradford West Gwillimbury  
 Based on a scenario of 50 single-detached units (2,500 sq. ft. each) and 75 townhouses (1,800 sq. ft. each).  
 \*\*6.9 hectares of development combined.  
 \*Engineering costs account for 10% of overall construction costs.  
 Source Altus Group, based on Municipal Fee and Charges By-Laws as of September 2024

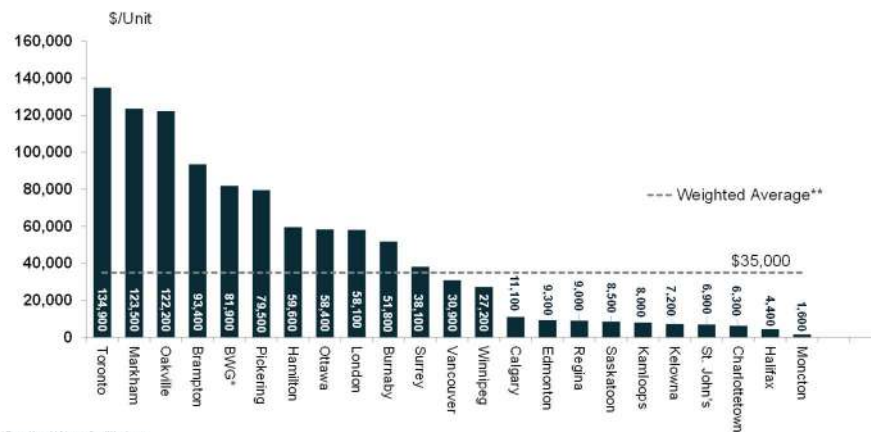


## Total Fees Levied on High-Rise Developments

Figure 17 and 18 show total fees levied on units in a high-rise development scenario by study municipality, broken down by infrastructure fees and planning application review fees.

Figure 17

**Total Municipal Fees, by Municipality, High-Rise Development Scenario, 2024**



\*Bradford West Gwillimbury  
 \*\*Based on municipal share in overall residential development in 2024  
 Source: Altus Group Economic Consulting, based on Municipal Fee By-Laws as of October 2024



On average, there are \$35,000 worth of fees levied on a new unit in a low-rise residential development across Canada. Fees range from a low of \$1,600 per unit (or \$2 per Sq. ft.) in Charlottetown, to a high of 134,900 per unit (or \$190 per sq. ft.) in the City of Toronto. The top 9 most expensive markets are all Ontario municipalities. The municipalities with the fewest fees are found in Atlantic Canada.

Total fees levied on a unit in a high-rise development have gone up by an average of \$3,000 since 2022, with the biggest increase in Burnaby (+40,200). Fees levied on this type of development have fallen in 3 of the 23 municipalities studied, with the largest drop in Calgary (-\$5,890). Declines in municipal fees reflects a drop in residential land values, bringing down density bonus and other land value capture fees.

Figure 18

**Development Fees, New High-Rise Residential Development, by Municipality, 2024**

	Total Infrastructure Related Fees	Planning Applications and Building Permit Fees	Per Unit	2022 Rates	Change 2022-2024	Total Fees per Sq. Ft. 2024
	Per Unit, \$					Per Sq. Ft.
Municipality						
Toronto	129,900	5,000	134,900	99,890	35,010	190.0
Markham	117,200	6,300	123,500	110,890	12,610	173.9
Vancouver	118,400	3,800	122,200	125,540	(3,340)	172.1
Brampton	89,900	3,500	93,400	79,650	13,750	131.5
Pickering	77,000	4,900	81,900	64,080	17,820	115.4
Oakville	70,500	9,000	79,500	74,640	4,860	112.0
Burnaby	53,000	6,600	59,600	19,260	40,340	83.9
BWG*	54,200	4,200	58,400	53,850	4,550	82.3
Surrey	56,200	1,900	58,100	48,650	9,450	81.8
Hamilton	48,400	3,400	51,800	41,690	10,110	73.0
Ottawa	36,300	1,800	38,100	35,080	3,020	53.7
Kelowna	18,200	12,700	30,900	-	30,900	43.5
London	26,100	1,100	27,200	22,280	4,920	38.3
Calgary	6,800	4,300	11,100	16,990	(5,890)	15.6
Saskatoon	5,900	3,400	9,300	6,460	2,840	13.1
Regina	4,300	4,700	9,000	3,960	5,040	12.7
Kamloops	6,400	2,100	8,500	-	8,500	12.0
Halifax	6,600	1,400	8,000	10,740	(2,740)	11.3
Moncton	5,600	1,600	7,200	2,300	4,900	10.1
Edmonton	1,500	5,400	6,900	6,600	300	9.7
Winnipeg	2,300	4,000	6,300	3,070	3,230	8.9
St. John's	1,700	2,700	4,400	1,460	2,940	6.2
Charlottetown	-	1,600	1,600	-	1,600	2.3
<b>Maximum Value</b>	129,900	12,700	134,900	125,540	40,340	190.0
<b>Minimum Value</b>	-	1,100	1,600	-	(5,890)	2.3
<b>Weighted Average</b>	31,000	4,000	35,000	32,000	3,000	49.3

Notes: \*Bradford West Gwillimbury

- 75 bachelor and 1-bedroom apartments (average sq. ft. of 650) and 75 2-bedrooms (750 sq. ft.).
- 0.5 hectares of development combined.
- Engineering costs account for 10% of overall construction costs.

Source: Altus Group, based on Municipal Fee and Charges By-Laws as of September 2024

## PLANNING FEATURES AND ACHIEVEMENTS

This section of the report reviews municipal planning features that are available to assist both staff in reviewing development applications that are submitted, and homebuilder applicants navigate the process requirements for their submissions.

The general purpose of this section is to help highlight best practices among planning organizational peers to aid in the adoption of methods to improve the application process for both applicants and municipal staff/councils.

As well, this section takes a closer look at application study requirements by providing an overview of what must potentially be submitted through the approval process.

Finally, this section closes with municipal achievements to provide an overview of planning policy and process trends are occurring across Canada. This segment of the report is meant to be a new platform to more directly facilitate the sharing of ideas between jurisdictions.

## Scorecard on Planning System Features

This edition of the Canada MBS makes some modification to the review of features from the previous study. After an internal review and feedback of our scoring process from the previous study, the number of themes that include features within them has been reduced from five (5) to three (3). As well, the total number of features being reviewed has been reduced from 16 to 13. The following features have been removed that were present in the previous study:

- Development Guidance Information
- Availability of Municipal Official Plans and Secondary Plans
- Availability of Meeting Minutes, Agendas, and Agenda items

All the features that were removed from the previous study had very high average scoring rates and therefore did not assist in distinguishing between leading municipalities and those that required improvement. As well, the rationalization of themes allows for a more focused discussion around areas of improvement so that details are more readily digestible to the reader.

Case studies on ‘best-in-class’ notable implementation of features, both scored and unscored, can be found in Appendix B for readers interested in specific examples of best practices for adoption.

The scoring methodology for all remaining features are unchanged from the previous edition except for application support materials and staff contact information, which have had their scoring simplified. While the reconstructed themes can still be largely compared with the previous edition, due to the inclusion of Kamloops and Kelowna, which don’t have any marks from 2022, no overall comparison is provided, no overall comparison between each edition is made as they would not be methodologically consistent with the additional municipalities skewing 2024 results.

In addition to the feedback provided in the analysis embedded in this section, staff at municipalities included in both the 2022 and 2024 studies are encouraged to make comparisons between their results in each study to better understand where there are still areas for improvements to be made. The new planning themes, with corresponding features, for this report are as follows:

Theme	Feature
Application Preparation	<ul style="list-style-type: none"> <li>(1) Application Support Materials</li> <li>(2) Zoning By-law in Interactive Map</li> <li>(3) Zoning By-law in Machine Readable Format</li> <li>(4) Staff Contact Information</li> </ul>
Application Submission	<ul style="list-style-type: none"> <li>(1) Planning Application Submission Options</li> <li>(2) Planning Application Payment Options</li> <li>(3) Building Permit Submission Options</li> <li>(4) Building Permit Payment Options</li> </ul>
Application Tracking	<ul style="list-style-type: none"> <li>(1) Active Application Information Website</li> <li>(2) Status Indicator for Applications</li> <li>(3) Historical Planning Data Availability</li> <li>(4) Interactive Map of Planning Applications</li> <li>(5) Availability of Application Submission Documents</li> </ul>

Specifics on the scoring methodology can be found in Appendix B, which all readers are highly encouraged to review to better understand what is being accounted for in terms of presence, or lack thereof, of a feature.

## Caveat

While this exercise provides insights into the level of sophistication of the municipal planning administrations being examined, the ratings do not necessarily reflect individual experiences an applicant may have when they submit a development application.

There are many aspects in the planning process that cannot be given a score but still influence the overall application experience. These can include the disposition of councils towards agreeing to new development, staff members rigidity or interpretation of policy, community temperament towards new housing, etc.

As an example, a municipality can have an outstanding development application system that makes submissions relatively frictionless, and/or staff that provide recommendations in

a timely manner. However, without Council and/or public support for more housing units getting approved and ultimately built, the development application processes and systems alone cannot make up for issues related to obstructionism or overall planning policy deficiencies.

Finally, an important caveat to acknowledge is the review of municipal websites occurred during Spring to Summer of 2024. Some municipalities may have added or changed the availability of planning features by the time of this report's publishing. For Hamilton, best efforts were made to interpret the availability of features before the city experienced a cyber security incident, however, some features may still be unavailable or regressed in that municipality by the time of this report's publication as a result of the incident.

## Theme-by-Theme Scoring Overview

### ***Application Preparation***

The purpose of this theme is to test how well municipalities assist applicants with the preparation of their submissions by making necessary information and staff available.

While municipalities cannot directly control the quality of application packages they receive, but they can help to improve the average quality of submissions by making resources available on their websites to help applicants with their preparation process.

By improving the quality of submissions, less staff time can be spent on non-review activities and more time spent on the actual reviewing applications ensuring they are all processed in a timelier manner. In engagements conducted between municipal staff and the researchers of this report, this point was either acknowledged or brought up by staff themselves.

Conversely for applicants, the application preparation process can be an arduous journey that requires the production of many different types of documents, the retaining of many specialized consultants to produce plans, reports, forms, and drafts (see section on study requirements on page 37 for more on this), and the organization of communications and interactions between the applicant's consultancy team and municipal staff.

Like municipal staff, consultants and others preparing submission documents on behalf of an applicant can often spend non-value-added time because requirements for a report are not clearly articulated, or they must do re-work because the first draft of a study was not prepared correctly due to a misunderstanding brought about by a communication failure.

Breakdowns in information exchanges are a major point of failure in the preparation and early submission process that can result in additional work for all participants involved –

municipal staff, applicants, consultants, etc. - that's raises costs and extends out timelines, which the purpose this theme is centered around addressing.

Figure 19 provides a summary of scores for the four features in the Application Preparation theme, as well as provide a generalized final aggregate scoring for each municipality. The overall score for this theme is 63%, with the highest level of implementation being zoning by-law interactive maps with an aggregate score of 96% across all the municipalities examined, while the feature with the lowest score is application support material, with only 34% compliance scoring.

Figure 19

Scoring Summary - Application Preparation				
Feature	Average Score			
(1) Application Support Materials	34%			
(2) Zoning By-law in Interactive Map	96%			
(3) Zoning By-law in Machine Readable Format	61%			
(4) Staff Contact Information	65%			
<b>Overall Score</b>	<b>64%</b>			

Score by Municipality	Significant Improvement 0% to 59%	Moderate Improvement 60% to 79%	Minor Improvement 80% to 99%	Best in Class
Toronto				X
Brampton		X		
Markham		X		
Oakville			X	
Bradford West Gwillimbury	X			
London		X		
Ottawa		X		
Pickering	X			
Hamilton			X	
Halifax			X	
Moncton	X			
Charlottetown	X			
St. John's	X			
Kelowna		X		
Surrey		X		
Kamloops		X		
Vancouver	X			
Burnaby		X		
Saskatoon	X			
Regina		X		
Edmonton		X		
Calgary		X		
Winnipeg	X			

Source: Altus Group Economic Consulting

9 out of 23 municipalities provide some form of dedicated webpage that features a list of required studies with accompanying terms of reference for an application submission. Most municipal websites provide either basic information, partial information, or only terms of reference for specific categories of studies – e.g. urban design.

In discussions with municipal planning leaders and some elected officials, it was acknowledged that there are cases where studies have been requested by staff in order to just 'check the box on a list'. Some municipalities indicated that they were reviewing their study requirements to identify opportunities to lower the burden on either specific applicants (e.g. affordable housing providers, etc.) or types of development scenarios (e.g. below X stores, etc.) to better guide their staff on when it is or isn't appropriate to request a study.



Municipal staff in a number of jurisdictions mention that having developed terms of references for listed study requirements also helps with issues such as staff onboarding. Newer staff, as well as more tenured planners, are better able to understand what to request, why, when, and how to avoid incomplete submissions after circulation has begun. This was identified as a productive and proactive step in helping applications avoid becoming stalled during the later phases of circulation process as deficiencies in documentation can be found earlier when there are more opportunities to readily address issues.

Superfluously requiring studies or other documentation represents additional financial and time burdens for applicants and increases the need for staff resources to process and analyze the reporting in-take. Providing a more fulsome study requirement list that both addresses when a study is required and when it should be exempt, in addition to the criteria necessary to fulfill the reporting requirement, can be helpful to both applicants and municipal staff alike.

All municipalities within the study now offer the public the ability to review zoning schedules, with the vast majority (21/23) offering this through interactive maps and the final 2 offering either static maps in a PDF format or address zoning data lookup options. However, only 14 of the 23 municipalities that have interactive maps also provide access to the 'machine readable' GIS ('geographic information system') data behind them, with those not offering this data mostly located in either Ontario or Atlantic Canada.

In discussion with municipal staff, it was acknowledged that making self-service tools available to the public like interactive zoning maps helps to lower the number of call-in inquires, which can take up staff time and focus away from higher value tasks.

All municipalities regardless of score are encouraged to periodically review their maps for technical issues as a standard operating procedure within a set review cycle even if there are no reported issues.

20 out of 23 municipalities in this study provide contact information in the form of an email, phone number, or both for their planning department, business units within the department, or directly for staff.

The ability to follow up with other members of a planning department or business unit can help to provide applicants with a sense of assurance, which can make dialog between all parties run more smoothly.

However, only 9 of 23 municipalities provide staff-level contact information, all other municipalities that provide contact information provide it at the departmental level. Vancouver was the only municipality to regression in contact information availability since the last study., with the regression occurring during the course of scoring in June 2024.

Common Issues	Best Practices
<ul style="list-style-type: none"> <li>• The discrepancy between the study requirement listing in a municipality’s official plan and the lack of it’s listing on their website;</li> <li>• Incomplete terms of references for all study requirements that are listed;</li> <li>• Putting study requirements in unintuitive places (e.g. applications forms instead of a dedicate webpage that follows best practices)</li> <li>• Municipalities not making all of their in-effect zoning by-law information available online (see the 2023 City of Toronto Committee of Adjustment Benchmarking Study section 3.4 for more details);</li> <li>• Maps only displaying the zoning code and not providing links to the applicable zoning by-law section with policy text when selecting a parcel or zoning district, or this feature having broken links;</li> <li>• Maps lacking colour coding making it difficult to at a glance understand the zoning structure of a municipality with no options to turn this feature on or off;</li> <li>• Maps only working with certain internet browsers but not others (2 different computers on 2 different networks were tested using Microsoft Edge and Google Chrome);</li> <li>• Maps with poor or unintuitive UX/UI (user experience design/user interface design);</li> <li>• Municipalities only providing only email or phone numbers for staff contacts (note this no longer affects final scoring);</li> <li>• Municipalities not providing staff directories; and</li> <li>• Providing departmental contact information and not specific staff information.</li> </ul>	<ul style="list-style-type: none"> <li>• Having a dedicated webpage for application support materials (a minimum to be scored)</li> <li>• Making sure that terms of references include statements for when a study is required and when it is exempt to aid both staff and applicant in understanding when a study is needed.</li> <li>• Providing both in-force and historic zoning data;</li> <li>• Linking zoning interactive maps to text of zoning by-law;</li> <li>• Providing a search directory for staff contact information; and</li> <li>• Providing staff contact information on development application web tracker.</li> </ul>

***Application Submission***

The purpose of this theme is to explore the level of digitization municipalities have adopted in their application submission process by allow for electronic submission and payment of applications and building permits. Providing applicants with online submission choices and a wider array of payments options creates a smoother process for both applicants and staff members charged with intake and managing circulation.

The digitization of application intake can enable automation of various tasks previously done by staff manually, which can help lower a municipality's own internal process burden and associated errors. As well, by implementing a base-level digital platform for handling applications, further tools can be built upon it to help real-time collaboration between applicants and staff for speedy restitution of issues.

Furthermore, having a digitally enabled workflow process allows planning managers to review KPIs ('key performance indicators') to help identify and improve upon processes that can increase productivity while enabling staff to more readily spot applications that have stalled or gone off track. In addition, it also enables greater collaboration between jurisdictions as it can facilitate the sharing of information and data on planning outcomes.

The figure provides a summary of scores for the four features in the Application Submission theme, as well as provide a generalized final aggregate scoring for each municipality. The overall score for this theme is 62%, with the highest scoring feature being 'building permit submission options' at 79% implementation, while the lowest is 'planning application payment options' at 45%.

Figure 20

Scoring Summary - Application Submission				
Feature	Average Score			
(1) Planning Application Submission Option	55%			
(2) Planning Application Payment Options	45%			
(3) Building Permit Submission Options	79%			
(4) Building Payment Options	70%			
<b>Overall Score</b>	<b>62%</b>			

Score by Municipality	Significant Improvement 0% to 59%	Moderate Improvement 60% to 79%	Minor Improvement 80% to 99%	Best in Class
Toronto		X		
Brampton		X		
Markham				X
Oakville		X		
Bradford West Gwillimbury	X			
London			X	
Ottawa		X		
Pickering			X	
Hamilton		X		
Halifax				X
Moncton	X			
Charlottetown	X			
St. John's				
Kelowna	X			
Surrey	X			
Kamloops	X			
Vancouver		X		
Burnaby	X			
Saskatoon				X
Regina	X			
Edmonton				X
Calgary				X
Winnipeg	X			

Source: Altus Group Economic Consulting

Eight municipalities within the study have detectable e-plan portals - where applicants are required to create accounts and there is an organized submission process. The remaining 3 municipalities electronic submission capabilities are centered around e-mails and digital forms.

17 out of 23 municipalities offer some form of electronic submission options for planning applications. However, this can range from allowing e-mails of forms, to having applicants use digital drop boxes or FTP ('File Transfer Protocol) websites that can handle large amounts of data transfers, to fully fledged e-planning portals that both guide applicants through the submission process and help municipal staff with the organization and review of applications.

16 of 23 municipalities provide indication that applications can be paid for through a method other than a cheque, e.g. by credit card, online, invoice, e-transfer, etc. However, a number of municipalities that have e-planning system either do not incorporate electronic payments or do not provide documentation that demonstrates that capability (a potential source of under-scoring).

21 out of 23 municipalities now allow some form of digital application submission of building permits, however, the depth of innovation adoption varies. 17 municipalities have decantable formal e-permit systems in place, but some municipalities don't yet fully allow all building permits for every type of residential development to be applied for online. For municipalities that don't have formal e-permit systems but do provide electronic services, they either have a digital form or email system available

20 of 23 municipalities allow some form of payment other than cheques for building permits, but many of the same issues that were identified for planning payments are present for building permits – low limits for the amount that can be processed online, having to pay with cheques when over the limit, having to fill out forms to request a wire transfer, timing payments with application submissions, etc.

Municipalities were found to have a lopsided adoption of technology innovation in the digitization of building permits compared to planning applications. While more research needs to be undertaken to better understand this dichotomy, some potential reasons include:

- Fewer departments or people involved in the review process for permits and therefore a less complex circulation requirement has to be facilitated;
- The application requirements for submissions are simpler (e.g. fewer documents are necessary to upload) and so it's easier to handle from an in-take administration and/or IT implementation perspective;
- Building permit office staff are more comfortable with implementing technology solutions than planning staff; and/or
- There are more 'off-the-shelf' software solutions available that are not as burdensome to implement.

Common Issues	Best Practices
<ul style="list-style-type: none"> <li>• E-planning or permitting systems not covering only a limited number of application types;</li> <li>• Only allowing a single account to be associated with any given application;</li> <li>• Continuing to have manual processes in place tied to operations of the digital system, such as when a new account is created a staff member must fist reach out to applicants before it's fully activated;</li> <li>• Staff members having to manually create digital links and share it with applicants;</li> <li>• Not clearly providing full description of capabilities or applications that can be applied through the system (a source of potential over-scoring);</li> <li>• Having conflicting statements in documentation on webpages about the development application process compared to those made in manuals about application submissions or payment options;</li> <li>• Having cap limits on payments that can easily be exceeded for many development scenarios where applicants then have to:               <ul style="list-style-type: none"> <li>○ Submit a cheque;</li> <li>○ Fill out additional forms to arrange alternative payments with staff;</li> <li>○ Call-in to a customer service line;</li> <li>○ Enter multiple 'shopping cart' entries in the e-planning system to add up to the total;</li> </ul> </li> <li>• Not tying payments through the formal e-planning/permit system; and</li> <li>• Requiring a wire transfer for larger sums on the same date as an application is submitted to avoid errors;</li> </ul>	<ul style="list-style-type: none"> <li>• Providing instructional videos;</li> <li>• Listing specific types of applications that can be applied for;</li> <li>• Providing clear information about payments;</li> <li>• Having FAQ ('frequently asked questions') webpages available to answer common questions;</li> <li>• Allowing multiple accounts to be associated with the same application; and</li> <li>• Having dedicated help contacts.</li> </ul>

### ***Application Tracking***

The purpose of this theme is to better understand what information applicants and the public can access about the status of a development proposal. While in discussions with municipal staff, it was noted that having a public facing tracking system provided a multitude of benefits, including reducing the number of direct inquiries about applications that can distract staff from focusing on application reviews.

As well, the features in this theme, combined with the previous Application Submission theme, can be used as a way to understand the level of administration technological capability that a municipality poses. Municipal staff have generally concurred that approximations about their back-end administrative abilities based on observations and insights developed for features in these two themes does represent a fairly accurate, although not perfect, reflection of their operating processes and technological sophistication - or lack thereof.

Figure 21 provides a summary of scores for the five features in the Application Tracking theme, as well as provide a generalized final aggregate scoring for each municipality. The overall score for this theme is 68%, with the highest scoring feature being 'active application information website' at 91% implementation, while the lowest scoring feature is 'availability of application submission documents' at 37%.

Figure 21

<b>Summary of Scoring - Application Tracking</b>				
<b>Feature</b>	<b>Average Score</b>			
(1) Active Application Information Website	91%			
(2) Status Indicator for Applications	72%			
(3) Historical Planning Data Availability	67%			
(4) Interactive Map of Planning Applications	72%			
(5) Availability Application Submission Documents	37%			
<b>Overall Score</b>	<b>68%</b>			
<b>Score by Municipality</b>	<b>Significant Improvement 0% to 59%</b>	<b>Moderate Improvement 60% to 79%</b>	<b>Minor Improvement 80% to 99%</b>	<b>Best in Class</b>
Toronto				X
Brampton			X	
Markham				X
Oakville				X
Bradford West Gwillimbury	X			
London			X	
Ottawa				X
Pickering			X	
Hamilton		X		
Halifax			X	
Moncton	X			
Charlottetown	X			
St. John's		X		
Kelowna		X		
Surrey			X	
Kamloops	X			
Vancouver			X	
Burnaby	X			
Saskatoon	X			
Regina		X		
Edmonton			X	
Calgary			X	
Winnipeg	X			

Source: Altus Group Economic Consulting



21 out of 23 municipalities in the study provide some way to assess active applications within the jurisdiction. There are generally 6 variations in the way active applications information is provided to the public, including:

1. A webpage that provides active applications by some geographic preset, typically by ward, that then allows the user to select a dedicated webpage created for the specific application they are seeking more information on;
2. Through an interactive map, often requiring the user to filter for active applications or applications within a preset geography such as neighbourhood or ward boundary;
3. A webpage that provides a scroll-through list of applications arranged by date along with other major public engagements going-on in the municipality;
4. A search portal where information such as street address or application number must be inputted to find further information;
5. A rudimentary text-box list of all applications in municipality with basic information such a status;
6. Uploaded PDF files with active application information listed in a formatted chart;

17 municipalities out of 23 now provide development tracker, with 16 of them providing it through an interactive map that addresses the most typical-use case that they're used for – e.g. understanding how a neighbourhood is developing, the types of housing homebuilders are developing in an area, etc. Interactive maps are highly useful for members of the public without significant technical expertise in helping them understand development activity data. However, more advanced users may find it limiting if the background data that supports the mapping is not provided in an open format available for download.

18 of 23 municipalities in the study provide some form of status indicator. However, 3 of the 18 municipalities only provide very rudimentary information about the status of an application, for example only providing the date of the public meeting or if it has already occurred. More advanced status indicators provide information such as if an application is being update by the applicant, the stage within the development process it is in, etc.

17 of the 23 municipalities in the study provide some historical planning data, however, 4 of the 17 only provided very high-level information. While municipalities are providing more historical development information than in the past, the way in which much of this data is displayed or disseminated highly limits its potential uses for researchers or other members of the public trying to better understand housing activity and planning decision-making. Some municipalities have started to create interactive websites that allow for some time-series examinations to be displayed for particular topics, however, this only allows for highly curated overviews.

The ability to independently use data records of municipal planning decision making still does not exist – a common complaint in the research (both private sector and governmental), journalism, and housing advocacy fields. This severely hinders the ability to develop deeper sets of analysis, including examinations that may present concerning aspects of decision-making that are appropriate to discuss in a society that has transparent and accountable governance.

10 of 23 municipalities allow for documents that were submitted as part of an application to be viewed by members of the public, however, 3 of the 10 municipalities that have this feature only provide rudimentary information, such as a list of documents that were submitted or only very select documents – e.g. concept plans or site plans but nothing else. In discussions with staff, it was noted that there were 3 potential benefits to providing documentation online, such as:

1. It lowered the number of inquiries from members of the public for documents associated with an application;
2. It allowed applicants to better understand what they may potentially required to submit; and
3. It can help applicants identify consulting firms or other technical experts that could help them fulfill reporting requirements.

Common Issues	Best Practices
<ul style="list-style-type: none"> <li>• Providing status or important dates on either an interactive map with development applications or and dedicated webpages for each development but not both;</li> <li>• Not having dedicated webpages for active applications;</li> <li>• Having a status indicator that doesn't provide meaningful information;</li> <li>• Listing studies that were submitted but not providing copies that can be downloaded;</li> <li>• Not providing open access to historical development application data, or only providing very limited data that did not include attributes that could allow the information to be used in a productive manner;</li> <li>• Providing only points for development applications;</li> <li>• Not providing filtering options for development application maps, or at least very limited options;</li> <li>• Not providing the option to download records being displayed in either a development application map or curated frame for planning application analysis;</li> </ul>	<ul style="list-style-type: none"> <li>• Providing both a dedicated webpage and an interactive map for active application information;</li> <li>• Supplying links in mapping information to dedicated application webpages;</li> <li>• Including on dedicated webpages for active applications important dates, staff contact information, submitted studies, and current status.</li> <li>• Explaining what a status indicator means;</li> <li>• Having a status indicator that provides meaningful information e.g. 'Waiting for 3rd submission', 'Application Refused', etc.</li> <li>• Providing the status of any related applications in a convenient format beside each other.</li> <li>• Providing copies of studies that were submitted;</li> <li>• Providing aggregate historical development application data with attributes such as date of submission, date of decision, description, etc.</li> <li>• Giving additional complementary map views such as population growth forecasts, land use designations, and other information along side development applications;</li> <li>• Offering polygons (borders) for applications instead of just points;</li> <li>• Displaying related applications in a way that was easily searchable;</li> <li>• Presenting filtering options like geographic area (typically ward boundaries), application submission date, application status, active application or all applications, etc;</li> <li>• Connecting mapping data to downloadable records such as documents that were submitted.</li> </ul>

## Combined Score

Figure 22 provides the final tally for every municipality for each theme and their total score ranked by highest to lowest. Each feature that makes up the three themes provides equal weighting to the total score. 12 municipalities have scores 70% or higher, while 11 cities are below this threshold. The aggregate overall score for all features and all municipalities is 65%, which is similar to the 63% overall score of all municipalities in the GTA MBS.

Figure 22

Combined Municipal Scores, All Planning Themes, 2024					
Rank	Municipality	Application Preparation	Application Submission	Application Tracking	Total Score
1	Halifax	94%	100%	90%	94%
2	Markham	75%	100%	100%	92%
3	Toronto	100%	69%	100%	90%
4	Oakville	88%	75%	100%	88%
5	London	75%	88%	90%	85%
6	Edmonton	75%	100%	80%	85%
7	Calgary	75%	100%	80%	85%
8	Ottawa	75%	69%	100%	83%
9	Brampton	75%	69%	80%	75%
10	Hamilton	88%	69%	60%	71%
11	Surrey	75%	44%	90%	71%
12	Vancouver	50%	69%	90%	71%
13	Pickering	38%	81%	80%	67%
14	Regina	75%	56%	60%	63%
15	Kelowna	63%	38%	70%	58%
16	Saskatoon	38%	100%	40%	58%
17	Burnaby	63%	56%	40%	52%
18	Moncton	50%	38%	40%	42%
19	Bradford West Gwillimbur	38%	25%	50%	38%
20	St. John's	38%	0%	60%	35%
21	Kamloops	63%	0%	40%	35%
22	Charlottetown	25%	38%	20%	27%
23	Winnipeg	38%	50%	0%	27%
<b>Overall</b>		<b>64%</b>	<b>62%</b>	<b>68%</b>	<b>65%</b>

Source: Altus Group Economic Consulting

## Study Requirements

Since the previous edition of this study, more municipalities have embedded clearer application submission requirements onto their websites, which allows for a more comprehensive and comparative overview. For this study, submission requirements have been bucketed into four categories – ‘plans’, ‘reports’, ‘forms’, and ‘drafts’ using the naming conventions of each document title. The categories are based on the following descriptions of documentation requirements:

- **Plans** are visual and/or graphical documents (e.g. maps, concepts, etc.);

- **Reports** are in-depth statements of analysis that provide overviews on topical areas of planning (e.g. traffic, employment conversion, housing needs assessment, etc.);
- **Forms** are documents that transfer high-level information about a development proposal (e.g. data sheet, comments, etc.); and
- **Drafts** are legal text write-ups of a municipality’s planning policies that applicants are sometimes required to provide– e.g. draft zoning by-laws, etc.

The specifics of the bucketing system used for both the GTA and Canadian MBS can be found in Appendix B along with individual municipal study requirement lists and categorizations. While best efforts were made to correctly identify and bucket application requirements, there may be incidents where a municipality may use the naming convention ‘study’ to mean plans/drawings, or vice versa.

Also note, the total application requirements for municipalities that were analyzed in the GTA MBS may differ from what is reported in this study, as the source for study requirements in the GTA MBS was based on official plans (municipal plan), while the source for this study are based on municipal websites.

Municipalities in Ontario are required by the province’s *Planning Act* to list all information they wish to request from an applicant as part of a complete application package in their official plans. However, often their official plans may only list a high-level concept (e.g. ‘engineering drawings’), while their actual websites provide for more specific study requirements, which is the cause for the difference in the number of documents reported between studies.

Figure 23 provides an overview of the total application submission requirements by document type by municipality as of August 2024. On average, municipalities in Canada potentially request up to 50 different types of documents to facilitate a development proposal’s path through the approval process.

Figure 23

<b>Total Application Submission Requirements, by Document Type, by Municipality, 2024</b>					
<b>Municipality</b>	<b>Requirement Type</b>				<b>Total</b>
	<b>Plan</b>	<b>Report</b>	<b>Form</b>	<b>Draft</b>	
	<i>Number of Documents</i>				
Toronto	27	30	2	3	62
Ottawa	9	31	0	0	40
Hamilton	11	29	5	0	45
Hamilton Phase 2	21	66	5	1	93
Halifax	25	22	0	0	47
Edmonton	14	23	0	0	37
Calgary	16	23	0	0	39
Winnipeg	10	17	7	0	34
<b>Average</b>	<b>17</b>	<b>30</b>	<b>2</b>	<b>1</b>	<b>50</b>

Note 1: Listed requirements that were excluded include planning application forms, related fees, and signage requirements.  
 Note 2: Hamilton Phase 2 is inclusive of both current and future study requirements.  
 Note 3: Total average is inclusive of Hamilton Phase 2 and excludes the other accounting for the city.  
 Source: Altus Group Economic Consulting, based on Municipal Official Plans

Note that the reported total average for all municipalities only includes the accounting of Hamilton Phase 2 requirement of 93 documents, and not the 45 it currently requires. Hamilton is provided two different accountings of documents as the city is in the process of updating its application requirements during the writing of this report. Hamilton is looking to add 48<sup>4</sup> new requirements for a total of 93 documents that may be requested from an applicant through its approval process.

Hamilton's example is not a unique situation but rather illustrative of a new common trend with many municipalities in Ontario, particularly in the Greater Toronto Area, that are either in the process of expanding their application requirements or have completed it. For example, the GTA MBS reported that Caledon requires 124 different potential documents as part of its development approval process, which is a result of it recently expanding its document requirements. Municipalities in Ontario are beginning to require nearly twice as many pieces of information documentation for their approval processes compared to their Canadian municipal peers outside of the province.

## Planning Achievements

In discussion with municipalities about gathering application data an additional request was made for them to provide 'achievements' that have occurred over the last 2 years. This request was generally an open-ended where any type of achievement -process, policy, etc. and complete or still underway – could be listed so long as it was within the last two-years.

16 out of 23 municipalities in the study provided approximately 190 achievements in total. Given the wide range of achievements provided, a curated thematic presentation of notable accomplishments will be provided. Much of the following text is based on direct wording provided by staff to describe achievements, with some editing for clarity and reading flow.

### *Nascent Forays into Artificial Intelligence*

While one of the grouping categories with the smallest number of achievements, and considered separately from other technological adoptions and improvements, it's important to note that municipalities have begun tentative steps in exploring the use of artificial intelligence ("AI") in assisting them with their approval processes. 3 municipalities provided 4 achievements that included descriptions of AI use, they include:

#### **Surrey:**

- Deployment of AI Chatbot - Development Inquiry Assistant (DIA) - designed to improve service and expedite the permitting process and was funded through the Housing Accelerator Fund grant. DIA focuses on answering common development questions, particularly related to single-family and tenant improvement building

<sup>4</sup> 93 total minus the 45 existing requirements = 48 net new requirements

permits. This benefits customers, staff, and the city by enhancing service quality, providing accurate information, and improving application accuracy. This initiative represents the first phase of a broader project aimed at expanding DIA's features and coverage, with future attention on rezoning, development permits, and subdivisions. DIA has been answering over 40 inquiries per day, free up staff resources to concentrate on processing applications. DIA's responses are tracked and reviewed for accuracy and completeness, maintaining a confidence rate of over 95%; and

- The city has worked on an eight-week proof of concept to leverage AI to streamline the plan review process for single-family building permits. An analysis of common deficiencies in single-family building permit applications revealed that compliance issues with the zoning By-law, with over 80% of building permit applications containing significant deficiencies. This has increased the burden on staff, requiring additional reviews and prolonging the permit issuance process. The proof of concept demonstrated that the solution selected by the city could accurately review critical use cases and deliver associated time savings and was suitable for the plan review setting. The city is currently working on the initial implementation of the solution, which is also funded by the Housing Accelerator Fund.<sup>5</sup>

**Edmonton:**

- To reduce the rate of discretionary inspections, the city has implemented a risk-based artificial intelligence model for new house construction to ensure inspection resources are allocated to high-risk inspections first. Overtime, builders with a good first-time pass history should see a reduction in the number of inspections as a result of this work.

**Moncton:**

- The city is in the process of adopting an e-permitting that they would like to couple with AI from the beginning. As this is an on-going achievement that is in the early stages of implementation, more significant details are not yet available.

Implementation of AI in the consumer and business markets is still in its infancy, therefore it's unsurprising that municipalities have by-in-large not yet jumped onto this trend en masse. However, as more vendors providing digital solutions geared to municipal clients become available incorporating 'AI' technology, this may become a larger trend in the future.

Mirroring the discrepancy in technological adoption between planning applications and building permits documented in the features overview subsection for application submissions, early adoption of AI into the approvals process also seems to be more

<sup>5</sup> [https://www.surrey.ca/sites/default/files/corporate-reports/CR\\_2024-R117.pdf](https://www.surrey.ca/sites/default/files/corporate-reports/CR_2024-R117.pdf)



focused on assisting with the building permits over planning applications. Overtime, this could further see the gap in the applicant experience between planning applications and building permits widen unless municipalities take more actions towards digitizing and adopting technological solutions to help with the planning application process.

### ***Other Technology and Website Enhancements***

Municipalities have begun to recognize the importance of technology both enabling the work staff to do throughout the approval process, as well as a key component of providing a high quality of service. Notable enhancements to the suite of digital tools used by municipalities include:

#### **Pickering**

- Pickering is developing a corporate digital readiness assessment and strategy to providing citizen-centred digital services. In early 2024, the City developed its first Digital Strategy, establishing an organization-wide commitment to digital transformation, with the project expected to take 3 to 5 years to complete. The first phase focuses on upgrading the City’s website to ensure a user-friendly experience, with attention to content, design and navigation, and optimum performance using web technologies. It also includes streamlining digital service delivery through the development of an online customer portal that provides a secure and personalized resident experience and improved multi-channel communications solution, among other online programs<sup>6</sup>; and
- Pickering created the ‘myPickering’ online web application, which provides a one-stop-shop for all of the building permit related service needs. The application allows customers to submit applications electronically, check the status of their permits, submit requests for service, and provides a corporate dashboard highlighting key performance indicators which can be shared in real-time with Council, staff and residents. This tool enables a complete end-to-end digitized permitting process, including online portal, mobile application and automated backend process. As part of the initial launch, the application included features such as 24/7 Building Permit applications, online building permit application payment, building permit application status and notification, and secure messaging with City Staff. Future features to be launched shortly include kiosks for submitting building permit applications. The City also plans to expand this application to include the ability to submit planning applications and to include other departments and their service related processes.

<sup>6</sup> <https://www.pickering.ca/en/city-hall/digital-strategy.aspx>

**Surrey:**

- Since 2021, Surrey has made significant investments in increasing the use of online permitting. The first phase of development has concluded, resulting in the implementation of online permitting capabilities for trades services, including Electrical, Plumbing, and Building inspections. Through the online permit portal, applicants now have greater visibility into the status of their projects and enhanced transparency regarding the requirements needed for their projects to advance. A significant enhancement includes the ability for contractors to be notified of outstanding inspection dependencies automatically. Surrey estimates that providing this information to contractors has reduced the number of failed inspection requests by 16%. The second phase of development is ongoing, aiming to expand online permitting to all Permitting and Land Development services, leveraging the learnings and investments from the first phase.

**Calgary:**

- Calgary has embarked on a multi-phase project to make enhancements aimed at improving the user experience, operational efficiency and enhancing digital services to Calgarians. Upgrades to its Development Map (“DMap”) platform marks the completion of the first phase of this project. The upgraded platform continues to provide same level of service as it previously did with as access to property information, application details and plans, and the ability to provide opinions on changes within communities while now providing new features such as 3D views, trees layer, policy overlays and application pages that offer quick and easy access to plans, details, and a way to submit feedback and community insights to staff;
- Calgary has a new online system for infrastructure construction drawings tied to development applications which reduced applicant effort with an intuitive user interface. Users can apply, submit and resubmit construction drawings and review the status of their application any time. This has decreased the number of status inquiry calls to staff by providing enhanced transparency and accountability; and
- After a successful pilot program, the Public Infrastructure team, now called Development Commitments, has successfully launched a fully digital process for executing development agreements. This has resulted in a significantly faster and more user-friendly process from the former paper process. Calgary saw processing times reduce from 5 days to as little as less than one day, enabling customers to receive signed agreements within hours instead of days.

**Regina:**

- Regina has made updates to it’s website based off feedback and analysis of the 2022 report. Improvements include making the development guide easier to read with many general improvements, including better linking to planning help including checklists. Links to service levels have been made more prominent. Improved

linking and navigation to council meetings minutes from planning areas and better linking to the Planning Commission process. The planning department now includes a contact directory for every member in the department; and

- Applicants in Regina can now track the status of permit applications online, along with making application fee payments. Plans are in place to allow for planning applications to be submitted online by 2025.

**Halifax:**

- Halifax has undertaken a \$12 million project transforming Planning & Development, Public Works, Halifax Water & Community Safety, permit, planning and licensing application and approvals processes. All permit, planning, licensing, and compliance application and approval functions have been digitized within a new POSSE LMS system. This allow for cradle to grave workflow management, which include e-plans and e-payments;
- Developed a brand-new web presence on Halifax.ca. This includes improvements to digital transparency, such as the provision of 14 new permit-based datasets on the municipality's open data catalogue along with 3 new dynamic map apps; and
- Implemented multiple dashboards for supervisors and management that provides improved trending, workflow, and performance management.

There is a clear trend of improvements around the implementation of back-end digital tools for staff and front-end applications for users of municipal services, such as applicants seeking approvals to build housing. Many municipalities have completed initial phases of their digitization efforts, which primarily have focused on building permits and quality of life improvements of their websites to set the stage for the next phase of enhancements. Many of the digital gaps discussed in this report around planning applications are expected to be addressed in 2025 and beyond.

***Zoning Reforms***

While many municipalities have made a plethora of zoning changes, as indicative with their submitted achievements, it is too soon to see what effect, if any, this may have on housing development. Nevertheless, federal, provincial, and municipal actions are beginning to see either work being undertaken to change zoning by-laws or updates being very recently completed. This includes:

**London:**

- Undertaking the 'ReThink Zoning' project, which is expected to deliver a new comprehensive zoning by-law that will implement The London Plan and replace the current Zoning By-law; and
- Introduced regulation and policy changes to permit 4 units per property as-of-right city-wide.

**Pickering:**

- Consolidating its existing six zoning by-laws through a multi-phase comprehensive review. The review examines all properties and their corresponding zones in Pickering, including residential, commercial, agricultural and industrial properties. The purpose is to consolidate the six existing parent zoning by-laws and city-wide amendments, such as regulations for infill and replacement Housing in established neighbourhoods and regulations for additional dwelling units. The consolidation will also involve reviewing existing zone categories within the six current zoning by-laws to establish a single structure of new zones that would apply City wide. The city is currently in Phase 2 of the consolidation review, which includes a second draft of the zoning by-law and public engagement; and
- Staff from Whitby and Pickering have developed a work plan to make it easier for the public to obtain building permits for detached additional dwelling units by pre-approving building designs. Pickering will provide the staff resources to undertake the necessary plan review of the drawings, while Whitby will provide financial resources, through their Housing Accelerator Fund grant, to compensate design professionals for the preparation of the design drawings.

**Burnaby**

- Burnaby is undertaking work on a Draft Land Use Framework, which proposes that each Official Community Plan (OCP) land use designation corresponds with a primary Zoning District in the new zoning by-law. The Framework proposes to have seven non-residential designations and nine residential designations. Residential land use designations will be differentiated by the maximum permitted number of storeys rather than density (FSR), as used previously; and
- The city is also undertaking a comprehensive update of its zoning by-law to modernize and simplify our existing development regulations for all zoning districts and to implement new provincial legislation and city plans and policies; and
- In response to new provincial legislation, the Burnaby completed a major amendment to its zoning by-law that consolidated the city's 12 existing R-Districts into one new R1 Small-Scale Multi-Unit Housing District.

**Vancouver:**

- Vancouver council approved changes that will make it easier to find and use information contained within the Zoning and Development By-law. The updated by-law contains tables, diagrams, re-organized sections, hyperlinks, and accessibility features replacing the existing text-based format. The simplified and more consistent regulations will be easier to understand and apply, which will help to streamline permit review;
- Zoning changes have been approved to add multiplexes as a new housing option in Vancouver and to simplify regulations for all new housing in low density areas,

including the consolidation of nine (9) residential zones into a single Residential Inclusive zone (R1-1); and

- Repealing 72 policies and guidelines that are outdated or incompatible with the new Vancouver Plan and other more recent policy directions. Approval of a new interim rezoning policy that will serve as a replacement.

**Edmonton:**

- For the first time in nearly 60 years, Edmonton has completed a comprehensive renewal of its zoning by-law. Although the previous by-law was reviewed, updated and adopted in 2001, the last significant overhaul was completed in 1961, when Edmonton's population was 276,000. Today, Edmonton has grown to a population of more than one million and is on pace to reach 1.25 million by 2030; and
- The new zoning by-law better aligns with strategic policies and directions, provides regulations that support better development outcomes, is user-friendly for all audiences, with clear, purposeful and enforceable regulations; and contains efficient and effective regulations, making it adaptable overtime.

**Regina:**

- Working to eliminate exclusionary zoning, increase permitted heights for existing mid-and high density zones and eliminate parking requirements; and
- Introduced Primary Intensification Areas that permit 6 storey development within 200m of main transit routes; and
- Also introduced Secondary Intensification Areas that permit 4 storey development within 800m of transit hubs.

**Saskatoon:**

- Undertaken amendments to Official Community Plan (“OCP”, Municipal Plan) and zoning by-law to allow increased development of accessory dwellings, including allowing both a basement secondary suite and a garden or garage suite on same site;
- Applied Corridor Land Uses to 6 plan areas in the city to support future rezonings;
- Made amendments to the OCP and zoning by-law to enable permitting as-of-right four dwelling units on a site in all residential zoning districts and four storey multiple-unit dwellings within 800 metres of planned bus rapid transit stations; and
- Undertaken city-wide removal of minimum parking requirements.

**Halifax:**

- Halifax is increasing permitted density on proposed Rapid Transit corridors;
- Allowing up to 8 units per lot in the Regional Centre subject to lot requirements & design standards and eliminating the ER-1 zone single unit dwelling zone;
- Enabling more internal conversions;

- Permitting for up to four units per lot in suburban residential neighbourhoods;
- Eliminating any remaining residential parking requirements in the Regional Centre, and significantly reducing parking residential parking requirements in the suburban area;
- Introducing more flexible regulations for secondary suites, backyard suites, and shared housing;
- Facilitating over forty opportunity sites in the Suburban Area under an as-of-right framework; and
- Total impact of changes is estimated by the city to provide regulatory capacity for nearly 71,000 units in the Regional Centre, and 135,000 units in the Suburban Area

Reviewing municipal achievements reveals certain key trends emerging. Many municipalities are completely re-writing their zoning by-laws from the ground up, which has not happened in many cases for decades. These rewrites not only help to enable more housing options, but also address issues such as consolidating zones to more simplified formats, making by-laws more user friendly to read and adjust in the future, and addressing by-laws that are unwieldy amalgamations of former older by-laws of municipalities that have not existed for decades. Other trends include eliminating parking requirements, allowing 3 to 4 units as-of-right, and enabling denser housing near higher order transit.

### ***Process Improvements***

Many achievements were related neither to technological upgrades or policy changes but rather process changes to help improve the customer experience for applicants or help staff to work effectively. These changes include:

#### **Brampton:**

- Brampton continues to allow and has been expanding the concurrent processing of building permit applications and site plan applications. The issuance of a "substantially complete memo" allows an applicant to apply for conditional permits and begin construction. For residential site plan applications approved within the timelines of this study, the average time savings from use of this process was 12.6 months (the average time between the date of the substantially complete memo and the date of full site plan approval). This results in applicants being able to start construction substantially earlier than otherwise possible.

#### **Vancouver:**

- Adoption of 3-3-3-1 Permit Approval Framework, which is an effort to help eliminate the City's housing construction backlog, increase the supply of market, non-market, and supportive housing, with permit approval time targets as follows:
  - Three days to approve home renovation permits (including renovations to accommodate mobility and accessibility-related challenges;

- Three weeks to approve single-family home and townhouse permits;
- Three months to approve permits for professionally designed multi-family and mid-rise projects where existing zoning is already in place; and
- One year to approve permits for a high-rise or large-scale project.

**Calgary:**

- Calgary has implemented a program Risk-Based Review Program for truncated reviews of construction drawings on low-risk projects. These are projects in a greenfield context and this program applies to later development phases where there are no significant offsite infrastructure or storm ponds. The program is only open to consultants with a positive track record of submitting quality packages. Several projects are now eligible for this streamlined service after initial submission. This initiative has reduced resubmissions and expedited infrastructure approvals for new greenfield communities;
- In January of each year, the city undertakes infrastructure project forecasting with call-outs to large engineering firms to understand their workplans have enhanced collaboration and alignment with developer timelines. These strategic meetings with developers and professionals aids the city to adapt to changing market conditions, and project timelines. This proactive approach and collaboration enabled a record number of serviced lots year-over-year.

**Edmonton:**

- Edmonton has introduced a new service centre appointments project for permits and licensing inquiry services. In previous years customers have experienced long and unpredictable walk-in services wait times. This change will enable customers to have certainty of when they can meet with City staff, plan for parking, and improve service quality. Walk-in services will be phased out, after which customers can book in-person, telephone and virtual appointments. Customers can continue to make inquiries via email and phone. The appointment model helps to better match a staff member with knowledge of the inquiry to the customer and will provide better quality service during the appointment;
- Implemented a Residential Permit Guide digital tool to help homeowners and contractors to determine what permits and associated requirements apply to their specific residential home improvement project. In the 3 months after implementation, applications received were 18% better compared to the same quarter in 2022. Processing time decreased and exceeded service levels despite highest ever application volumes;
- Enabled booking of multiple inspections for a project at the same time online. Can request multiple inspections for each Safety Code discipline (building, HVAC, electrical, or plumbing & gas) to take place the same day for the same project. Supports a more coordinated and efficient service for larger projects; and



- Through a Customer Satisfaction (CSat) monitoring program, the city collects and incorporate feedback from permit and licence applicants on an ongoing and timely basis and use it to help identify and drive red tape reduction and continuous improvement opportunities. Performance is measured using a Customer Satisfaction Score (CSAT), which refers to percentage of applicants who indicated they were satisfied or very satisfied with the service received. The City aims to achieve a score of 75% or higher across all survey types. 86% - 92% of customers consistent rate they are satisfied or very satisfied with the service received.

The examples provided illustrate how strategic process changes can significantly enhance the customer experience and improve operational efficiency within city permit and licensing departments. Collaborative approaches and proactive customer engagement can address challenges faced by both applicants and city staff.

## Overall Ranking

The overall benchmark ranking by municipality is shown in Figure 31. The results show that:

- For the majority of municipalities, it is rare to rank high or low in all categories.
- The exception on the low end is **Bradford West Gwillimbury**, which benchmarks low in most categories
- **Edmonton, Halifax and London are** at the top of the list for having only moderately high municipal fees and timelines and planning features.
- 7/10 of the bottom performing municipalities are in Ontario.
- **Vancouver and Burnaby** are also in the bottom 10.

Figure 24

Combined Ranking - 2024 Municipal Benchmarking Study - Study Municipalities									
Municipality	Municipal Fees		Approval Timelines		Planning Features		Combined Scoring		
	Total Value	Rank	Average Timelines	Rank	Score	Rank	Overall Index	Overall Rank	
	Per Unit (\$), weighted average of development	(Lowest to Highest)	Months	(Lowest to Highest)	%	Highest to Lowest	Weighted Average	(Lowest to Highest)	
Edmonton	22,680	8	3	4	0.8	5	1.26	1	
Halifax	14,008	6	10	13	0.9	1	1.26	2	
London	33,930	9	5	7	0.8	5	1.14	3	
Regina	15,476	7	3	3	0.6	14	1.12	4	
Calgary	50,286	11	4	6	0.8	5	1.01	5	
Moncton	7,485	2	2	2	0.4	18	1.00	6	
Charlottetown	5,270	1	3	5	0.3	22	0.83	7	
Kelowna	35,026	10	6	8	0.6	15	0.83	8	
Kamloops	13,936	5	7	10	0.3	20	0.74	9	
Surrey	64,884	15	6	9	0.7	10	0.71	10	
Saskatoon	61,479	13	2	1	0.6	15	0.71	11	
St. John's	13,119	4	9	12	0.3	20	0.71	12	
Ottawa	54,370	12	17	18	0.8	8	0.62	13	
Winnipeg	9,976	3	10	14	0.3	22	0.62	14	
Oakville	113,842	20	14	15	0.9	4	0.25	15	
Burnaby	66,936	16	16	17	0.5	17	0.23	16	
Vancouver	118,935	21	8	11	0.7	10	0.21	17	
Brampton	108,222	18	14	16	0.8	9	0.16	18	
Hamilton	64,546	14	31	23	0.7	10	0.04	19	
Pickering	109,951	19	17	19	0.7	13	(0.01)	20	
Toronto	138,157	22	25	22	0.9	3	(0.22)	21	
Markham	160,013	23	23	20	0.9	2	(0.32)	22	
Bradford West Gwillimbury	102,700	17	24	21	0.4	19	(0.41)	23	
Weighted Average	47,625		11.24		0.65				
Weight (%)		40%		30%		30%			

Source: Altus Group, based on Municipal Fee and Charges By-Laws, Municipal websites and data, as of August 2024

## POLICY IMPLICATIONS

The development application process is lengthy and can add significant costs to a new home. While the average application timeline is 11.2 months across the municipalities studied, if a development must seek to gain each of a zoning by-law, municipal plan approval, Plan of subdivision, and/or condominium, and site plan approvals, that can add up to 46 months (almost 4 years) in the development application process.

The combined high cost of residential development and lengthy approval timelines, have additional knock-on costs that get imbedded in either access or affordability of housing.

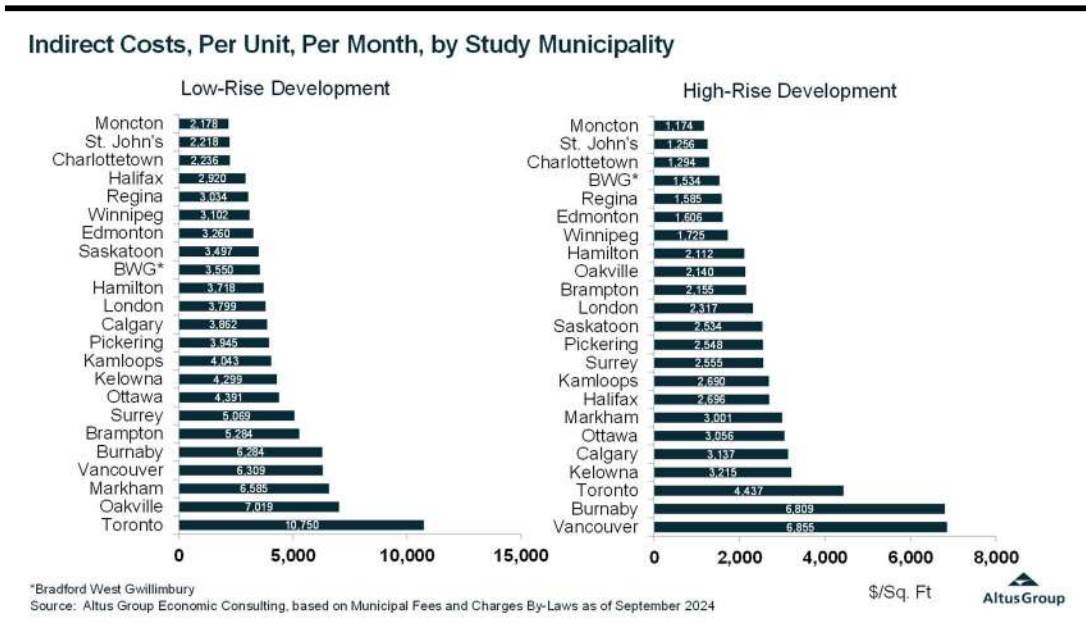
### Indirect Costs of Residential Development Application Process

In addition to the direct municipal fees levied on new residential development, the development application process adds additional costs to the construction process, of which include:

- Residential property taxes paid on vacant, underutilized land;
- Financing and/or opportunity costs of holding land vacant, or underutilized; and
- Cost escalation. Accounting for inflation, the cost of constructing a home will be more expensive in four years-time than it is today.

Figure 25 shows the combined indirect costs per month, per unit that accumulate on a development as its application goes through the application process.

Figure 25



The indirect costs range from a low of \$2,178 in Moncton to a high of \$10,700 in the City of Toronto for a unit in a low-rise development. For a unit in a high-rise development, the indirect costs range from a low of \$1,174 in a Halifax to a high of almost \$7,000 in the City of Toronto.

## Municipalities that benchmark low, also have worse housing outcomes

Altus created a housing index to benchmark each Study Municipality based on measures of affordability and availability of housing. This index is built off the following variables:

- **Housing Affordability:** Metrics of the share of income an average household would have to spend on Ownership and Rental costs;
- **Suppressed Households:** The headship rate (and resulting homeownership rate) declined in the last census. Affordability issues are resulting in significantly more persons staying at home longer, or roommating than otherwise would be the case. Think of Millennials and Gen Z'ers trapped in their parental homes. It is estimated that Canada had roughly 48,000 suppressed households in 2021, 1/5 of which are in the City of Toronto. That number has likely risen to over 200,000 by 2024.
- **Rental Vacancy Rate (%):** The rental vacancy rate provides a barometer of supply in the rental market. A vacancy rate of 2-3% highlights a well balanced market. A vacancy rate of below this represents a tight rental market, in which rents are usually rising sharply. Values above this range indicate a well supplied rental market, where rents are either declining, or not growing significantly. Note, only 6 of the 23 municipalities studied had a vacancy rate in the 2-3% range. All other municipalities were below 2%.
- **Out/In Migration:** Population moving in/out of municipality as a proxy for how attractive a municipality is given its housing backdrop.

The results of the index are shown in Figure 28. Seven of the eight municipalities with the worst housing outcomes are in Ontario, and those that benchmark low in this study. The municipalities with the best outcomes are Edmonton, Calgary, Moncton and St. John's, municipalities that ranked better in this study.

Figure 26

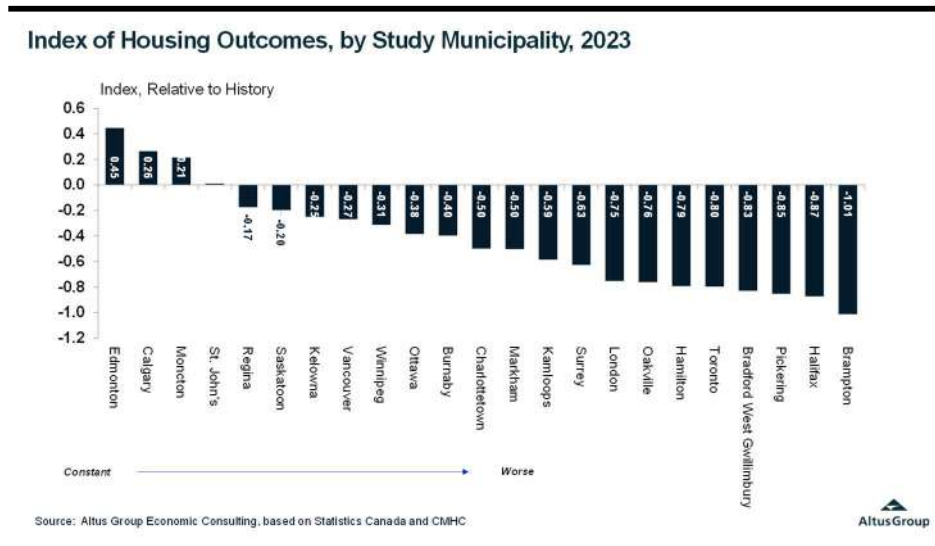
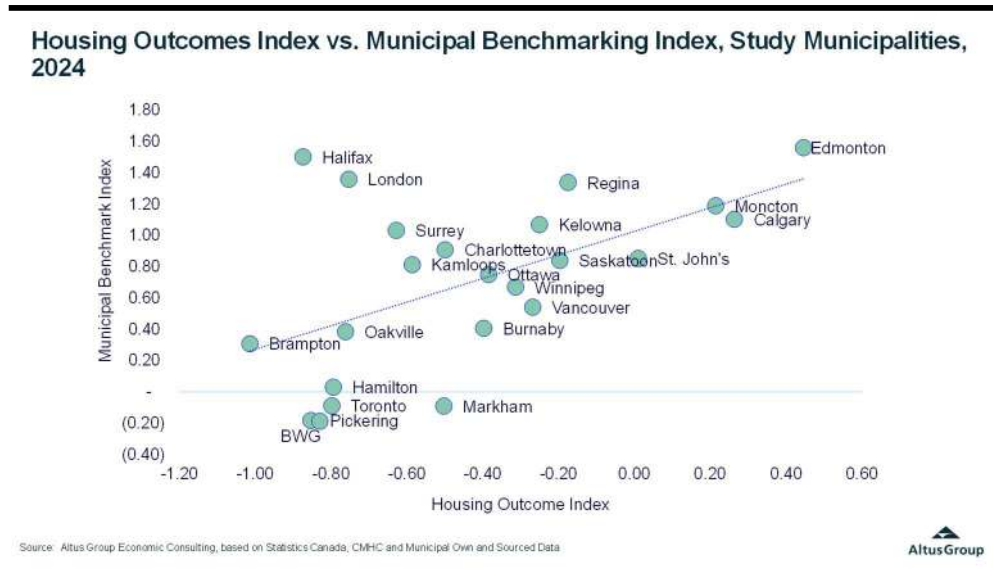


Figure 27 shows the relationship between the overall benchmark index against the housing outcome index. With some exceptions, municipalities that benchmark low, also have worse housing outcomes, in terms of more expensive and fewer housing options.

Figure 27



## FINAL REMARKS AND CONCLUSION

This report benchmarks municipalities based on key development features, including:

- Municipal fees charged on new residential development;
- How long it takes a residential development application to move through the development application process; and
- The features in place to help applicants navigate the development application process.

Key findings of this report include:

- Construction activity is not able to keep pace with population growth in the municipalities studied.
- Immigration remains the key driver of population growth in most municipalities in Canada.
- Increased outmigration is limiting population growth in the City of Toronto and Peel, while Calgary, Durham and Simcoe have become top destinations for young people.
- Housing Affordability has worsened since the inaugural MBS, with rents and home prices at lofty levels.
- Edmonton, Halifax and London benchmark at the top of the list for having only moderately high municipal fees and timelines and planning features. 7/10 of the bottom performing municipalities are in Ontario. Vancouver and Burnaby are also in the bottom 10.
- Average municipal fees have risen since the last MBS in 2022 by:
  - An average of \$27,500 per unit on low-rise developments; and
  - An average of \$3,000 per unit on high-rise developments.
- The average municipal fee on a low-rise dwelling is \$82,600, and range from \$8,700 to \$195,000.
- The average municipal fee on a high-rise dwelling was \$35,000, and ranked from roughly \$1,600 to \$134,400.
- Total municipal fees on a unit in a high-rise development are significantly higher on a per sq. ft. basis than for those in a low-rise development. Municipal fees range from \$2 to \$190 per sq. ft on a unit in a high-rise development, compared to \$2 to \$88 on a unit in a low-rise development.
- Total application submissions have fallen from peaks reached in 2021, due to a combination of policy changes and economic factors.

- As municipalities have made some efforts to reduce application time lines, the length of time any one application takes to reach approval has gone down by 2.1 months overall.
- Still, it takes each application upwards of 11.2 months to move through the application process. This ranges from 2 months in Saskatoon, to 31.0 months in Hamilton.
- The indirect costs of the development application process range from a low of \$2,178 in Moncton to a high of \$10,700 in the City of Toronto for a unit in a low-rise development. For a unit in a high-rise development, the indirect costs range from a low of \$1,174 in a Halifax to a high of almost \$7,000 in the City of Toronto.
- Overall, municipalities that benchmark low also have worse housing outcomes, in terms of availability and affordability of housing.

# APPENDIX A – TERMINOLOGY AND DATA MANAGEMENT

## Terminology

Planning in Canada between provinces is not uniform in practice, nor does it use a singular naming convention for many of the same processes or procedures. The following sections are intended to familiarize readers with the terms used across the country, as well as provide a broad explanation of the nomenclature.

Term	Description
<p><b>Municipal Plan</b></p>	<p>A “municipal plan” is a statutory (legal) document that municipalities are required by provinces to produce that outlines their vision for how they will meet the needs of current residents and grow into the future. The plan they create must also respect various provincial policy objectives that apply to land development (e.g. greenbelt, growth plans, affordable housing, etc.). Municipal plans typically include land-use designation maps that broadly outline intended uses (e.g. industrial, commercial, residential, mixed use) for different parts of the municipality.</p> <p>While municipal plans are typically broad in nature, they may also include area specific plans for places of importance (e.g. downtown, business district, waterfront, etc.) that provide greater policy details. Such details could include where future roads or parks are expected to be placed or outlying the future intended nature of a site or area to be developed. These more specific plans are referred to as site-specific plans, block plans, neighbourhood plans, secondary plans, district plans or area plans among other terms.</p> <p>Municipalities are often required by provinces to periodically review and update their plans so that they stay relevant to current conditions as the assumptions and forecasted trends (e.g. demographic / employment growth, household size changes, land consumption needs etc.) used to create the policies within the plan may become outdated over time. Some municipalities may have a self-imposed period in which they choose to review their municipal plan.</p> <p>Developers will sometimes request that municipalities amend their plan so that they can build a structure or add a land use to a site or an area that wasn't envisioned for such structures or uses when the plan was first created. Applications to amend municipal plans are often considered to be a significant request and can result in extended review periods. The cost of the review process can be quite high for the developer in terms of both time and money.</p> <p><u>Nomenclature across Canada:</u></p>



	<ul style="list-style-type: none"> <li>• Newfoundland and Labrador – Municipal Plan</li> <li>• Prince Edward Island – Official Plan</li> <li>• Nova Scotia – Municipal Planning Strategy</li> <li>• New Brunswick – Municipal Plan</li> <li>• Ontario – Official Plan</li> <li>• Manitoba – Development Plan</li> <li>• Saskatchewan – Official Community Plan</li> <li>• Alberta – Municipal Development Plan</li> <li>• British Columbia – Official Community Plan</li> </ul>
<p><b>Zoning</b></p>	<p>While a municipal plan sets the vision and objectives for land development through broad policies, municipalities create zoning by-laws as a mechanism to provide specific implementation of the plan’s policies. Zoning by-laws will often provide each property within a municipality’s boundaries a “code” (e.g. R-1, RD, etc.) that would often include the following:</p> <ul style="list-style-type: none"> <li>• Permitted (allowing specific uses), prohibited (allowing any use not specifically prohibited) and/or discretionary uses (uses that may be allowed, subject to municipal approval)<sup>7</sup></li> <li>• Types of structures that are allowed (e.g. single detached, stacked townhomes, apartments, etc.);</li> <li>• Where on the site the building can be located (setbacks from street, neighbouring buildings, etc.)</li> <li>• The height the building can be;</li> <li>• The ground coverage they can have (building footprint relative to site area);</li> <li>• Density of the building (gross floor area relative to site area);</li> </ul> <p style="padding-left: 40px;">A developer may need to apply for a rezoning amendment for a multitude of reasons, however, most typical applications are one of the three types:</p> <ol style="list-style-type: none"> <li>1. <b>Concurrent (Joint) Municipal Plan / Zoning Amendment Applications:</b> A developer needing to apply for rezoning along with an application for a municipal plan amendment. Changing a municipal plan land-use designation for a property does not automatically confer changes to the zoning code. For example, a redesignation of a property from industrial to residential would require an amendment to the municipal plan, but also would require the application of new zoning rules to specify what form the residential uses shall take. Some municipalities offer application fee discounts for joint municipal plan and zoning by-law amendment applications, due to the economies of scale that can arise from planning staff reviewing two applications associated with the same property.</li> </ol>

<sup>7</sup> A discretionary permission provides clarity to landowners as to what may be allowed but gives municipalities a higher degree of control than the ‘permitted’ or ‘prohibited’ approach would provide.

2. **Conformity with General Land Use, but Significant Changes Required to Permitted Built Form from Existing Zoning:** A developer may need to apply for a rezoning application, even if the general land use conforms to the municipal plan, as zoning by-laws often do not necessarily align with municipal plans.
3. **Conformity with General Land Use, but Minor Changes Required to Existing Zoning:** A developer may request a zoning amendment due to a minor deviation with what is permitted in the zoning by-law. For example, a proposal to build an apartment may have slight deviations from the prescribed setbacks from the street or adjacent buildings. These types of zoning by-law amendments are commonly referred to as a minor zoning amendment, minor variances, or variances. There is a wide-ranging difference between municipalities in what they classify as a minor or major zoning change request. One municipality may classify a parking deviation request as minor while another municipality would consider the same case as major. Councils may sometimes delegate some decision making authority to staff or citizen-run approval bodies to handle these types of minor requests, so as to ensure Council's time is spent on more significant matters.

<p><b>Subdivision</b></p>	<p>Subdivision is the process by which a single parcel of land is legally separated and turned into multiple smaller parcels, each with their own title, or vice versa. Many “plan of subdivision” approvals includes ‘subdivision agreements’ that are made between landowners and municipalities and set out how the developer is to provide certain services like roads, sewers and other hard infrastructure on their lands, or adjoining public lands. Given the detailed nature of these plans, and the significant engineering and design that is required to allow for the installation of water works, sanitary sewer works, roads, storm water management facilities, etc., the subdivision approval process can require long periods of time.</p>
<p><b>Condominium/Strata</b></p>	<p>Another type of approval that municipalities provide is for plans of condominium or strata (heretofore referred as condominium or “condo”). Plans of condominium can be for any type of building (residential or non-residential), and any form (single-detached, semi-detached, townhouses, apartments). For residential plans of condominium, these plans typically show the boundaries, shape and dimension of each unit, the “common elements” that may include parking areas, private roads, sidewalks, lobbies, etc. A condominium corporation is created to pay for the operation and maintenance of these common elements.</p>
<p><b>Site Plan</b></p>	<p>Municipalities utilize site plan control to ensure that a proposed development is properly planned, addressing issues including the layout of buildings, building massing, parking, landscaping, and building access. Given the detailed nature of the elements under review during site plan processes, this stage of approval can be one of the more time-consuming stages.</p>

## Development Permits

Many municipalities in Canada utilize a development permit system, which is a permit that gets approved by an administrative authority with delegated powers, typically known as a Development Officer. A development permit system expedites many elements of the planning approvals process, but combining things such as zoning, site plan and minor variance processes into one application and approval.

In some municipalities, a development permit study is undertaken for an area that pre-defines what the permitted built form and look of an area will be, as guided by a public consultation process. Then, once the development permit bylaw is approved, development applications can proceed in a much more expedient manner than if they each had to individually submit rezoning and site plan applications and be subject to a separate public consultation process.

In other municipalities, a development permit is a delegated approval process that allows development to proceed by confirming that all requirements of land use by-laws and other planning documents have been met, with some conditions that may be added to stipulate what permitted uses are, density, building height, site coverage, etc.

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## Data Management

Before providing details on data management, it should be noted that the background data provided by municipalities will not be made available in in any form for those seeking it. The reason for this is twofold:

1. Consent has not been granted by municipalities to provide their data to any other person or entity for any purpose other than the analysis conducted in this report;
2. The purpose of this report is not to be a source of baselevel background information but to provide analysis built from the expertise of the researchers involved in this report.

Similar to the process used in previous editions, the data collected was cleaned through a two-stage process. In the first stage, applications that were not relevant to the analysis like non-residential development, a-typical residential projects such as long-term care/senior's homes, affordable housing projects, student dorms, etc., and non-major residential projects such as those with less than 3 units<sup>8</sup>, additions, accessory dwelling units ("ADUs"), replacements, etc. were removed. As well, applications that were refused or where a decision was made by a board, tribunal, court, or a province were taken out as the stated timelines are for applications approved by a municipal council or by the delegated authority of staff.

<sup>8</sup> Where the number of units could be determined.

Applications that had a negative number of days where one or more critical dates (i.e. submission or decision date) was missing were removed at the end of the first stage cleaning process.

Municipalities are encouraged to adopt more regular reviews of their timeline data to ensure their validity by producing datasets similar to the ones created for this study where dates can easily be compared at scale to help identify errors for correction.

As well, municipalities should consider implementing logic tests for timeline entries in their application tracking software as a proactive step to reduce errors from being created in the first place. This would involve providing prompting alerts to staff that are entering dates to double check that submission dates are coming before a decision dates and not entered in as coming after, or dates that are more than 20 years into the future/past are truly valid.

Upfront logic tests and prompts could be used as a simple method help to reduce the number of initial record-keeping errors, which dates seem to be prone to. However, it's acknowledged that implementing such a feature may be technically complex depending on the software being used.

In the second data clean-up stage, a special treatment process was applied to municipalities in Ontario. Official Plan Amendments ("OPA", Municipal Plan Amendments), Zoning By-law Amendments ("ZBLA"), Site Plan, and Subdivision<sup>9</sup> applications that were concurrent with either of the previously mentioned application types and were submitted after July 1<sup>st</sup>, 2023 – commonly referred to as 'Bill 109 applications' – were separated into their own bucket for analysis.

Bill 109 – *More Homes for Everyone Act*, which received royal assent in April 2022, created a policy treatment for concurrent OPA/ZBLA, sole ZBLA, and Site Plan applications where an applicant would receive application fee refunds should a municipality fail to provide decision within the specified timeline – 120 days for OPA/ZBLAs, 90 days for ZBLAs, and 60 days for Site Plans.

This refund policy was initially set to come into effect on January 1<sup>st</sup>, 2023, and as a result many municipalities created mandatory pre-application consultation ("PAC") process in reaction to the new policy. In June 2023, Bill 97 - *Helping Homebuyers, Protecting Tenants Act* received royal assent, which pushed back the date that refunds would come into effect to July 1<sup>st</sup>, 2023. It also cancelled/transitioned refunds of any application submitted prior to this date.

The sample size of the post July 1<sup>st</sup> Bill 109 applications was 107 applications in total – 3 for Brampton, 16 for Markham, 5 for Oakville, 10 for Ottawa, 42 for London

<sup>9</sup> A total of 5 Subdivision applications were concurrent with OPAs, ZBLA,s or Site Plans where the submission and decision data were the same as the other applications.

and 31 for Toronto. These applications had between 80% to 95% shorter application timelines than those not affected by the refund policy. Based on an examination of the data, and in conversation with staff from multiple municipalities, it was determined that these shorter timelines were a result of process changes rather than improvements. For most municipalities that had these types of applications within the dataset, including them would have very minor effects on their total timelines.

This study is also not the first timeline analysis to create a distinction between applications affected by Bill 109 in Ontario. In its analysis of application timelines, Toronto has separated out applications timelines between those submitted pre and post July 1<sup>st</sup>, 2023 for its quarterly *Development Review Timeline Metrics*. To be consistent with the precedent set by the City's analysis, this study has also adopted this practice.

Manipulating the timeline accounting system in response to the refund provisions of Bill 109 is an understandable response by municipalities, but this also makes them appear to be achieving greater strides on paper than in reality. Ultimately this does not result in a benefit to an applicant in terms of improved predictability, lower risk, or reduced costs that can be translated into more homes being built faster. With the end of mandatory pre-consultation meetings from Bill 185, these 'improvements' are also likely not replicable moving into the future.

Applications that were submitted before July 1<sup>st</sup>, 2023 (non-Bill 109) for municipalities in Ontario, and all other applications for municipalities outside of Ontario irrespective of their submission date, underwent a third stage distribution analysis to identify and remove outliers – those in the 'long-tails' of the distribution. As a result, 294 applications were removed from the final analysis for being identified as statistical outliers, which had an average timeline of 953 days (31.3 months).

Where there were also too few data points to produce a robust sample for a particular type of application, all observations were also removed so as not to influence the total averages.

# APPENDIX B –CASE STUDIES, PLANNING FEATURES SCORING METHODOLOGY, & STUDY REQUIREMENTS

## Case Studies

### (1) Major Dates Text Box Standardization

While not a scored feature, an important developing best practice to acknowledge has been the standardization and presentation of major dates in staff reports to council that both Hamilton and Oakville have adopted.

Despite municipal performance and planning outcomes increasing in importance in common discourses, documentation that could help provide better understanding, such as staff reports, remain largely unapproachable for most people without a background in the legislative context or nomenclature of planning.

This can create confusion and misunderstandings for not just general members of the public, but also elected officials such as council members, and researchers who are trying to explore various planning topics.

A simple way to address this transparency issue is to organize key or major dates into a text box that can be understood at a glance. Figure 28 provides examples of date text box excerpts from staff recommendation reported submitted to councils in Oakville and Hamilton for two development proposals.

Figure 28

### Major Dates in Staff Report Examples

Town of Oakville

Key Milestones:	
Pre-Consultation Meeting	August 9, 2023
Public Information Meeting	N/A
Pre-submission Review	N/A
Application Deemed Complete	August 28, 2023
P & D Council - Public Meeting	October 16, 2023
Date Eligible for Appeal/Refund for Non-decision	December 27, 2023

This application is subject to Section 34 (10.12) of the *Planning Act* as amended by Bill 97, as the application was considered complete after July 1, 2023.

City of Hamilton

Processing Details	
Received:	April 19, 2021.
Deemed Complete:	May 13, 2021.
Notice of Complete Application:	Sent to 128 property owners within 120 metres of the subject property on May 21, 2021.
Public Notice Sign:	Posted May 20, 2021 and updated with public meeting date on July 13, 2022.
Notice of Public Meeting:	Sent to 128 property owners within 120 metres of the subject property on July 22, 2022.
Public Consultation:	The Applicant held a virtual Public Open House meeting on September 23, 2021, with invitations sent to 125 properties within the area. A total of 41 interested parties participated in the Public Open House meeting, and comments were provided to the applicant. The comments received during the Public Open House are provided in Appendix "F-2" attached to Report PED22139.
Public Comments:	Letters of objection were submitted by 28 interested parties expressing concern for the proposed Official Plan Amendment and Zoning By-law Amendment applications.  Public comments are summarized in the table below and are provided in Appendix "F-1" attached to Report PED22139.
Processing Time:	477 days from date of receipt of initial Application. 106 day from receipt of revised development proposal.

Source: Altus Group Economic Consulting based on Town of Oakville and City of Hamilton Staff Reports

Municipalities should consider adopting similar information standardization methods for presenting key dates within their own staff reporting to assist relevant

stakeholders in better understanding how long an application has been with municipal authorities. Provincial authorities could help to spread this best practice by creating regulations around 'minimum staff reporting requirements' to ensure that staff recommendation reports include information boxes with particular dates as is relevant to the planning legislative context.

## **(2) Terms of Reference Requirements**

While more municipalities are beginning to organize their study requirements with dedicated webpages, often these websites can lack accompanying terms of references. A term of reference helps both the applicant and staff member understand what is required to fulfill an information request – e.g. housing needs assessment, shadow study, etc.

However, it was noted in discussions with several municipalities that are undertaking major terms of reference update projects that simply providing what is required is no longer sufficient information in a terms of reference document. With many municipalities expanding their study requirement lists, frontline municipal staff are finding it difficult to judge when it is appropriate to request a study that is listed on a checklist and when it is not.

It was noted that even experienced staff members can often run into issues where they end up requesting unnecessary studies because they are erring on the side of caution as they cannot find any guidance to factor in their decision-making to provide an exemption.

One method to address this lack of guidance is to include within terms of references outlines for when a study is required. Figure 29 provides an example of a terms of reference requirement section for a shadow analysis in Ottawa. The terms of reference clearly outline the conditions that need to be met for when such a study should be requested, providing key information and expectations to both applicants and frontline staff at a glance.



Figure 29

## Terms of Reference Requirements



### Shadow Analysis

#### Terms of Reference

##### 1. Description

The Shadow Analysis is a planning submission requirement which provides a visual model of how the proposed development will cast its shadow. Further the Shadow Analysis will demonstrate any potential impacts on shadow sensitive areas, such as public spaces, communal amenity areas, Mainstreet Corridors and Minor Corridors, as designated in the Official Plan and residential private outdoor amenity areas and how these impacts can be mitigated (if applicable).

##### 2. When Required

A Shadow Analysis will be requested as part of the submission package when an increase in height and/or massing is submitted through a Zoning By-law amendment application, for a residential, commercial or office use. Two triggers will determine if the Zoning By-law Amendment will require a Shadow Analysis:

- Development inside the Greenbelt (as designated in the Official Plan): the proposed development is over 5 storeys in height ( $\leq 15$  meters). If a development proposal is 5 storeys or less, but is proposing an increase in height and/or massing and is in close proximity to a shadow sensitive area, a shadow analysis may be requested.
- OR -
- Development proposals outside the Greenbelt: the proposed development is over 3 storeys in height ( $\leq 9$  meters) and is in close proximity to a shadow sensitive area. Where a proposed development is not in close proximity to a shadow sensitive area (e.g. industrial development) the trigger for a shadow analysis is over 5 storeys in height ( $\leq 15$  meters).

The requirement for and scope of a Shadow Analysis will be determined at the formal pre-consultation meeting.



Source: Altus Group Economic Consulting based on City of Ottawa Terms of Reference

One additional step that municipalities should consider adopting within their terms of reference beyond what is required and when it is required, are when it is exempt, which can be distinct scenarios from when it is required,

For example, a non-profit builder should not be required to provide a housing impact assessment report outlining how their project benefits a municipality. These studies can be expensive to produce and while they may have merit in cases of market rate housing, providing an outright exemption for non-profits may help to encourage non-market types of homes to be more readily built. Contemplation should be given for other appropriate applications of exemptions.

Municipalities, such as those in Ontario, that are greatly expanding their study requirement lists should consider such action's impact on frontline staff's ability to navigate these requests and process all of the new documentation. Municipalities should not be asking for information until basic terms of references have been

completed to help guide both staff and applicants through the information request as part of the approval process.

## Municipal Planning Features Scoring Methodology

### Application Preparation

#### (1) Application Support Materials

- **No Marks (0/2)** are awarded if there are no study requirements listed on a dedicated webpage.
- **Half Marks (1/2)** if there is a dedicated webpage that lists some study requirement information and accompanying terms of reference.
- **Bonus Marks (1.5/2)** if there is a dedicated webpage that lists most but not all required studies with accompanying terms of reference.
- **Full Marks (2/2)** are awarded if there is a dedicated webpage that provides a largely complete list of study requirements with accompanying terms of reference.
- Note: Despite the *Planning Act* requirement to have all required studies listed in municipal plans for municipalities in Ontario, they only received marks for what was available on their webpages. Many applicants are not familiar with this policy and scoring municipalities on this basis would not accurately capture the review of their development guidance.

#### (2) Dedicated Interactive Zoning Map

- **No Marks (0/2)** are awarded if it is not possible to get property zoning information online. Online requests that take several business days or that cost money fall into this marking scheme.
- **Half Marks (1/2)** are awarded if it is possible to get property zoning information, but it is in a static format such as a schedule in a PDF file or as part of a written property record.
- **Full Marks (2/2)** are awarded if there is a dedicated online zoning map using GIS data with polygons that provide zoning boundaries and information in an interactive manner.

#### (3) Availability of GIS Zoning Open Data

- **No Marks (0/2)** are awarded if it is not possible to download zoning information in an open data format, such as Shapefile, GEOJson, CSV, etc.

- **Full Marks (2/2)** are awarded if it is possible to download zoning information in an open data format, such as Shapefile, GEOJson, CSV, etc.

(4) Availability of Municipal Staff Phone Number and Emails

- **No Marks (0/2)** are awarded if the only way to contact the planning or building department is through a service hub email or phone number (e.g. 311).
- **Half Marks (1/2)** are awarded if there is a dedicated email or phone number to contact the planning department or business unit but not for individual staff.
- **Full Marks (2/2)** are awarded if you can contact individual staff members in the planning or building department by either email, phone, or both.

### Application Submission

(1) Planning Application Submission

- **No Marks (0/2)** are awarded if there was no way to transmit documentation through the internet. Applications that have to be submitted through a digital format, such as CD or USB, but physically mailed in were included in this marking scheme.
- **Half Marks (1/2)** are awarded if application documents can be sent by email or by a digital drop box created by the applicant.
- **Bonus Marks (1.5/2)** are awarded if a municipality had an e-planning portal but this system only covered a limited number of application types (e.g. only subdivision or site plans but not official plan amendments or zoning bylaw amendments)
- **Full Marks (2/2)** are awarded if a municipality had a dedicated planning portal for most or all application types or digital drop box service an applicant could use operated by the municipality for all application types.

(2) Planning Application Payment

- **No Marks (0/2)** are awarded if it isn't possible to pay fees other than through cheque.
- **Partial Marks (0.5/2)** are awarded if there were additional methods of payment other than cheque but not online (e.g. credit card payment at a service desk)
- **Half Marks (1/2)** are awarded if payment could be made over the phone or by email through wire transfer.
- **Bonus Marks (1.5/2)** are awarded if some applications can be paid for online or if there is a limit on how large a fee can be paid (e.g. \$10,000 cap).
  - For clarity, if any excess payment requires a cheque to be written then only award 'bonus marks' (1.5), if excess payments can be made through other forms of electronic payment - e.g. wire transfer - as part of an electronic submission system then award full-marks. For further clarity, if only some

applications can be paid by an electronic system but not all, award only 1.5 marks.

- **Full Marks (2/2)** are awarded if you can fully pay all fees online without limit.

(3) Building Permit Submission

- **No Marks (0/2)** are awarded if there was no way to transmit documentation through the internet. Applications that have to be submitted through a digital format, such as CD or USB, but physically mailed in were included in this marking scheme.
- **Half Marks (1/2)** are awarded if application documents can be sent by email or by a digital drop box created by the applicant.
- **Bonus Marks (1.5/2)** are awarded if a municipality had an e-planning portal but this system only covered a limited number of application types (e.g. only subdivision or site plans but not official plan amendments or zoning bylaw amendments)
- **Full Marks (2/2)** are awarded if a municipality had a dedicated planning portal for most or all application types or digital drop box service an applicant could use operated by the municipality for all application types.

(4) Building Permit Payment

- **No Marks (0/2)** are awarded if it isn't possible to pay fees other than through cheque.
- **Partial Marks (0.5/2)** are awarded if there were additional methods of payment other than cheque but not online (e.g. credit card payment at a service desk)
- **Half Marks (1/2)** are awarded if payment could be made over the phone or by email through wire transfer.
- **Bonus Marks (1.5/2)** are awarded if some applications can be paid for online or if there is a limit on how large a fee can be paid (e.g. \$10,000 cap).
  - For clarity, if any excess payment requires a cheque to be written then only award 'bonus marks' (1.5), if excess payments can be made through other forms of electronic payment - e.g. wire transfer - as part of an electronic submission system then award full-marks. For further clarity, if only some applications can be paid by an electronic system but not all, award only 1.5 marks.
- **Full Marks (2/2)** are awarded if you can fully pay all fees online without limit.

### Application Tracking

(1) Active Application Information Website

- **No Marks (0/2)** are awarded if no active development application information is displayed anywhere, this includes open data portals.

- **Full Marks (2/2)** are awarded for displaying active applications of major applications.  
(2) Status Indicator for Applications
- **No Marks (0/2)** are awarded if there is no status information for active applications
- **Half Marks (1/2)** are awarded if some status information is provided (e.g. if public notices have been issued or a council decision has been issued).
- **Full Marks (2/2)** are awarded for full status information on applications.  
(3) Historic Planning Data Availability
- **No Marks (0/2)** are awarded if there is no historical application data
- **Half Marks (1/2)** are awarded if there is historical data but only with very limited information. For example, data does not go back beyond a year or the data that is present is only high-level information like application number and address.
- **Full Marks (2/2)** are provided for historical data that goes back beyond a year and provides several points of data, e.g. description, application number, address, number of units, polygon of development site on a map, etc.  
(4) Interactive Map of Planning Applications
- **No Marks (0/2)** are awarded if there is no map of development applications, or the only geographical information is pins on google maps of individual applications as it defeats the purpose of being able to see at a glance where development is happening.
- **Half Marks (1/2)** are awarded if the map of development applications is a static PDF file. This system depends on planning staff to regularly update both the data, create a map, and post it to the municipality's website, which can become erratic as either personnel turnover or organization priorities for staff time and resources shift.
- **Full Marks (2/2)** are awarded if there is an interactive geographic information system ("GIS") map of active and/or historical information. No marks are deducted if only active and not historical application information is displayed, or the mapping is part of an open data portal that produces maps with various datasets including active applications that is regularly updated.  
(5) Availability Application Submission Documents
- **No Marks (0/2)** are awarded if there is no supporting file information available.
- **Half Marks (1/2)** are awarded if there is only drawings and staff report information available or additional reports and documents are available by request only.
- **Full Marks (2/2)** are awarded if most documents associated with an active application are available online for the public to view.

## Application Submission Requirement Lists and Bucketing

Figure 30

Planning Application Submission Requirements Bucket List				
Plan	Report	Forms	Drafts	Omitted Documents
Drawings, Maps	Multi Page Analysis	Basic Certification Information	Drafts of Bylaws or Plans	Application Form
<b>Document Header</b>				
Boundary / Limits	Analysis	Access Approval	Draft Subdivison	Application Form
Building / Site Details	Assessment	Acknowledgement	Draft Condo	Fees
Concept	Assistance Plan	Agreement	Draft OPA	Signage Requirements
Declaration	Audit	Calulation	Draft ZBLA	Pre-Consultation Forms
Delineation	Board	Certification		Comments from other Agencies or Bodies
Demarcation	Brief	Checklist		
Design Brief	Classification Study	Comments		
Details	Compliance Statement	Compliance Approval		
Diagram	Conformity With Policy/Plan	Correspondence		
Digital Versions/Plans	Conservation Plan	Data (Sheet / Matrix)		
Drawings	Containment Plan	Declaration		
Elevations	Development Standard	Deed		
Flyover / Flythroughs	Distance Separation	Document		
Illustration	Documents	Estimate		
Image	Energy Plan	General Development Application Forms		
Inventory	Evaluation	Information Sheet / Form		
Map	Financing Plan	Inventory (Form)		
Model	Green Standard	Letter		
Phasing	Guidelines	List		
Photograph	Heritage Survey	Matrix		
Plotting	Impact (Statement)	Ministerial Consent		
Renderings	Implementation Plan	Parcel Abstract		
Samples	Management Plan	Permit		
Sketch	Memo	Pin		
Survey	Options Statement	Questionnaire		
	Phosphorus Budget	Record / Confirmation Of Consultation		
	Principles	Response To Comments		
	Profile	Statement		
	Proposal	Summary		
	Rationale	Title Search / Sheets		
	Rehabilitation Plan	Zoning Letters		
	Restoration Plan			
	Restrictions			
	Review			
	Services Demand Table			
	Servicing Plan			
	Site Record			
	Standards			
	Strategy			
	Street/Right-Of-Way Requirements			
	Study			
	Water Budget			

Source: Altus Group Economic Consulting based on various municipal official plans

Figure 31

**Development Application Submission Requirements, City of Toronto**

Studies	Type
1:50 Scale Detailed Colour Building Elevations	Plan
Accessibility Design Standards Checklist	Report
Air Quality And Odour Study	Report
Arborist Report	Report
Archaeological Assessment	Report
Architecture Control Guidelines	Report
Avenue Segment Review Study	Report
Block Context Plan	Plan
Boundary Plan Of Survey	Plan
Community Services And Facilities Studies	Report
Compatibility/Mitigation Study	Report
Computer Generated Building Mass Model	Plan
Concept Site And Landscape Plan	Plan
Conceptual Grading Plan	Plan
Conceptual Servicing Plan	Plan
Construction Management Plan	Report
Contaminated Site Assessment	Report
Context Plan	Plan
Draft Official Plan Amendment	Draft
Draft Plan Of Condominium	Draft
Draft Plan Of Subdivision	Plan
Draft Zoning By-Law Amendment	Draft
Electromagnetic Field (Emf) Management Plan	Report
Energy Modelling Guidelines	Report
Energy Strategy (Net Zero Emissions Strategy)	Report
Environmental Impact Study	Report
Erosion/Sediment Control Plan	Plan
Floor Plan(s)	Plan
Geotechnical Study/Hydrological Review	Report
Heritage Impact Assessment (Hia)	Report
Housing Issues Report	Report
Landscape & Planting Plan	Plan
Lighting Plan	Plan
Methane Gas Study	Report
Natural Heritage Impact Study	Report
Noise Impact Study	Report
Pedestrian Level Wind Study	Report
Perspective Drawing	Plan
Planning Rationale	Report
Project Data Sheet	Form
Public Consultation Strategy Report	Report
Public Utilities Plan	Plan
Rail Safety And Risk Mitigation Report	Report
Roof Plan	Plan
Servicing Report	Report
Simplified Report Graphics	Plan
Site And Building Elevations	Plan
Site And Building Sections	Plan
Site Grading Plan	Plan
Site Plan	Plan
Site Servicing Plan	Plan
Soil Volume Plan	Plan
Stormwater Management Report	Report
Subdivision Concept Plan	Plan
Sun/Shadow Study	Report
Topographic Survey	Plan
Toronto Green Standard	Form
Transportation Impact Study	Report
Tree Protection Plan	Plan
Underground Garage Plan(s)	Plan
Urban Design Guidelines	Report
Vibration Study	Report

Source: Altus Group Economic Consulting



Figure 32

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**Development Application Submission Requirements, City of Ottawa**

Studies	Type
Agrology And Soil Capability Study	Report
Archaeological Assessment	Report
Building Elevations	Plan
Community Energy Plan	Plan
Composite Utility Plan	Plan
Energy Modelling Report	Report
Environmental Impact Study	Report
Environmental Management Plan	Report
Environmental Site Assessment (Phase 1 & Phase 2)	Report
Geotechnical Study	Report
Grading And Drainage Plan	Plan
Heritage Act Acknowledgement	Report
Heritage Impact Assessment	Report
High Performance Development Standard	Report
Hydrogeological And Terrain Analysis	Report
Impact Assessment Study - Mineral Aggregate	Report
Impact Assessment Study - Mining Hazards	Report
Impact Assessment Study - Waste Disposal Sites / Former Landfill Sites	Report
Landscape Plan	Plan
Mature Neighbourhoods Streetscape Character Analysis	Report
Minimum Distance Separation	Report
Noise Control Study	Report
Parking Plan	Plan
Plan Of Survey	Plan
Planning Rationale	Report
Preliminary Construction Management Plan	Plan
Public Consultation Strategy	Report
Rail Proximity Study	Report
Shadow Analysis	Report
Site Plan	Plan
Site Servicing Study	Report
Slope Stability Study	Report
Transportation Impact Assessment	Report
Tree Conservation Report	Report
Urban Design Brief	Report
Urban Design Review Panel Report	Report
Water Budget Assessment	Report
Wellhead Protection Study	Report
Wind Analysis	Report
Zoning Confirmation Report	Report

Source: Altus Group Economic Consulting

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Figure 33

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**Development Application Submission Requirements, City of Hamilton**

Studies	Type
3D Model	Plan
Affordable Housing Report/Rental Conversion Assessment	Report
Aggregate Resource Assessment	Report
Agricultural Impact Assessment	Report
Archaeological Assessment	Report
Concept Plan	Plan
Construction Management Plan	Plan
Cost Recovery Agreement	Form
Cultural Heritage Assessment Documentation and Salvage Plan	Plan
Cultural Heritage Impact Assessment	Report
Cycling Route Analysis	Report
Environmental Impact Statement	Report
Environmental Site Assessment and/or Record of Site Condition	Report
Farm Economics Report	Report
General Vegetation Inventory	Plan
Housing Report	Report
Impact Assessment for New Private Waste Disposal Sites	Report
Landscape Plan	Plan
Linkage Assessment	Report
Materials Palette or Imagery	Plan
Minimum Distance Separation Calculation	Form
Modern Roundabout and Neighbourhood Roundabout Analysis	Report
Neighbourhood Traffic Calming Options Report	Report
Parking Analysis Study	Report
Pedestrian Route and Sidewalk Analysis	Report
Planning Justification Report	Report
Pre-Technical Conservation Authority Review	Report
Public Consultation Summary, Comment Response	Form
Right of Way Impact Assessment	Report
Roadway Development Safety Audit	Report
Site Lighting Plan	Plan
Sun-Shadow Study	Report
Summary Response to Formal Consultation Comments	Form
Survey Plan	Plan
Transit Assessment	Report
TDM Options Report	Report
Transportation Impact Study	Report
Tree Management Plan	Plan
Tree Protection Plan	Plan
Urban Design Architectural Guidelines	Report
Urban Design Report and Design Review Panel Summary	Form
Visual Impact Assessment	Report
Wildland Fire Assessment	Report
Wind Study	Report
Zoning Compliance Review	Report

Source: Altus Group Economic Consulting

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Figure 34

**Development Application Submission Requirements, Phase 2, City of Hamilton**

Studies	Type
Air Quality Study	Report
Channel Design and Geofluvial Assessment	Report
Chloride Impact Study	Report
Contaminant Management Plan	Plan
Cut and Fill Analysis	Report
Draft Official Plan Amendment/ Draft Zoning By-law Amendment	Draft
Dust Impact Analysis	Report
Energy and Environmental Assessment Report	Report
Erosion and Sediment Control Plan	Plan
Erosion Hazard Assessment	Report
Financial Impact Analysis	Report
Fish Habitat Assessment	Report
Floodline Delineation Study/Hydraulic Analysis	Report
Full Disclosure Report	Report
Functional Servicing Feasibility Report	Report
Grading Plan	Plan
Hydrogeological Study	Report
Karst Assessment/Karst Contingency Plan	Plan
Land Use Compatibility Study	Report
Land Use in the Vicinity of Existing Pipelines Study	Report
Land Use Commercial Needs and Impact Assessment	Report
Landfill Impact Assessment	Report
Limit of ESA or Limit of Regulated Area	Report
Market Impact Study	Report
Master Drainage Plan	Plan
Meander Belt Assessment	Report
Noise Impact Study	Report
Nutrient Management Study	Report
Odour Impact Assessment	Report
Odour, Dust and/or Light Impact Assessment	Report
Recreation Feasibility Study	Report
Recreation Needs Assessment	Report
Restoration Plan	Plan
School Accommodation Issues Assessment	Report
School and City Rec Facility & Outdoor Rec Park Issues Assessment	Report
Servicing Options Report	Report
Shoreline Assessment Study/Coastal Engineers Study	Report
Site Plan and Building Elevations	Plan
Slope Stability Study and Report	Report
Soil Management Plan	Plan
Soils Geotechnical Study	Report
Species Habitat Assessment	Report
Storm Water Management Report	Report
Sub-watershed Plan	Plan
Vibration Study	Report
Water and Wastewater Servicing Study	Report
Watermain Hydraulic Analysis	Report
Water Well Survey and Contingency Plan	Plan

Source: Altus Group Economic Consulting

Figure 35

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**Development Application Submission Requirements, City of Halifax**

Studies	Type
Aerial Photographs	Plan
Amended Plan Of Subdivision	Plan
Application Summary Table	Report
Architectural Rendering Of Streetline	Plan
Building / Site Lighting Plan	Plan
Building / Site Signage Plan	Plan
Building Design Variance Illustration	Plan
Certification Of Facts	Report
Construction Cost Estimate	Report
Context Map	Plan
Design Of Private Shared Driveway	Plan
Digital 3D Model Of Proposal	Plan
Drawings - Large Format	Plan
Elevations	Plan
Engineering Design Drawings	Plan
Engineering Drawings	Plan
Engineering Reports (Or Letter)	Report
Engineer'S Certificate Of Design Compliance	Report
Environmental (Impact) Assessment	Report
Floor Plans	Plan
Groundwater Assessment	Report
Heritage Impact Statement	Report
Hrmsd-1	Report
Land Suitability Analysis	Report
Legal Description Of Property	Report
Material Board	Report
On-Site Sewage Disposal System Details	Report
Perspective Drawings	Plan
Plan Of Subdivision	Plan
Plan Of Survey	Plan
Preliminary Landscape Plan	Plan
Preliminary Plan Of Subdivision	Plan
Preliminary Stormwater Management Plan	Plan
Project / Design Rationale	Report
Projected Population Density	Report
Public Consultation Summary	Report
Servicing Schematic	Plan
Shadow Study	Report
Site Plan	Plan
Site Servicing Plan	Plan
Storm Drainage Plan	Plan
Stormwater Management, Erosion And Sedimentation Control	Report
Subdivision Grading Plan	Plan
Traffic Impact Statement / Study	Report
View / Sight Line Statement	Report
Wind Impact Analysis With Mitigation	Report
Wind Impact Assessment	Report

Source: Altus Group Economic Consulting

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Figure 36

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**Development Application Submission Requirements, City of Edmonton**

Studies	Type
Arterial Roads Concept Plan	Plan
Collector And Arterial Intersections Details	Plan
Commercial/Retail Market Needs Assessment	Report
Community Knowledge Campus Needs Assessment	Report
Digital 3D Model Of Proposal	Plan
Direct Control Or Special Area Zone	Plan
Direct Control Pre-Application Notification Summary	Report
Drainage Servicing Report	Report
Ecological Design Report	Report
Ecological Network Report (Phase I)	Report
Ecological Network Report (Phase II)	Report
Electromagnetic Survey	Plan
Engineering Reports (Or Letter)	Report
Environmental (Impact) Assessment	Report
Environmental Site Assessment (Phase I)	Report
Floodplain Information	Plan
Geotechnical (And Hydrogeotechnical Impact) Report	Report
Hydraulic Network Analysis	Plan
Marked Up Tentative Plan Of Subdivision	Plan
Natural Area Management Plan	Plan
Neighbourhood Design Report	Report
Noise Study	Report
Parkland Impact Assessment	Report
Property Value Appraisal Report	Report
Risk Assessment Report	Report
River Valley Area Redevelopment Plan Study	Report
Shadow Study	Report
Site Location Survey	Plan
Subdivision Context Map	Plan
Swept Path Analysis	Report
Temporary Servicing Report	Report
Tentative Plan Of Subdivision	Plan
Top Of Bank Walk	Plan
Transportation Impact Assessment	Report
Urban Design Brief	Report
Wildlife Passage Report	Report
Wind Impact Assessment	Plan

Source: Altus Group Economic Consulting

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Figure 37

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**Development Application Submission Requirements, City of Calgary**

Studies	Type
Addressing Plan	Plan
Applicant Outreach Summary	Report
Approved Pavement Design	Plan
Biophysical Impact Assessment Report	Report
Climate Resilience Inventory Form	Report
Colour Photographs	Plan
Concept Plans	Plan
Deep Fills Report	Report
Elevation Drawings	Plan
Environmental Assessment Report	Report
Erosion And Sediment Control Plan	Plan
Geotechnical And/Or Hydrogeological Evaluation	Report
Geotechnical Soil Stability Report	Report
Ground Water Impact Analysis	Report
Historic Resources Application	Report
Historical Resource Impact Assessment	Report
Key Plan Showing The Lands To Be Subdivided	Plan
Legal Plans	Plan
Market Study Analysis	Report
Ministerial Consent	Report
Natural Area Management Plan	Report
Noise Study	Report
Outline Plan	Plan
Parking Rationale	Report
Parks, School, And Municipal Reserve Concept Plans	Plan
Phase 1 And/Or 2 Environmental Site Assessment	Report
Presence Or Absence Of Abandoned Wells Map	Plan
Proposed Tentative Plan	Plan
Real Property Report, Prepared By An Alberta Land Surveyor	Report
Sanitary Servicing Study	Report
Shadow Plan(S)	Plan
Site Contamination Statement	Report
Site Plan And/Or Context Plan	Plan
Slope Stability Report	Report
Soils Study	Report
Stormwater Drainage Plan	Plan
Stormwater Management Report	Report
Transportation Impact Assessment	Report
Water Network Design	Plan

Source: Altus Group Economic Consulting