

Council Member Inquiry Form
Demande de renseignement d'un membre du Conseil

Subject: Deemed Incompletes

Objet : Demandes jugées incomplètes

Submitted at: Planning and Housing
Committee

Présenté au: Comité de l'urbanisme et du
logement

From/Exp.:

Date: June 18, 2025

File/Dossier : PHC 2025 02

Councillor/Conseiller D. Hill

Date: le 18 juin 2025

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l'usage du Bureau du greffe
seulement

To/Destinataire:

Marcia Wallace, General Manager, Planning, Development and Building Services,
Directrice Générale, Direction générale des services de la planification, de
l'aménagement et du bâtiment

Inquiry:

On June 14, 2023 City Council adopted the Provincial Bill 109 requirement that all development applications must receive a decision within 60 or 90 days of receipt, and created a "pre-consultation" period, where staff would ensure that plans and studies were completed in accordance with the terms of reference, consistent with one another and that they addressed any known issues identified by staff before the 60-90 day period began. On June 6, 2024 Ontario Bill 185 received royal assent, which removed the ability for municipalities to require pre-consultation. In September 2024 the City reviewed the impacts of this change and required adjustments to the planning process, including moving the initial step of deeming an application complete to being within the application timeline. Accordingly, the City set new review targets of 90 days for individual site plan applications and 120 days for zoning applications.

With that in mind, can staff please review the following:

- 1) On average how many development applications does a typical planning employee have responsibility for at any one-time, including pre-submissions-?**

- 2) Since council implemented a 90-day window to review individual site plan applications and a 120-day window to reviewing zoning applications in September 2024, what percentage of applications have been approved within the new approval targets of 90 or 120 days?**
- 3) Since adopting the new process, on average, how many days does the City require to deem an application complete? Please include in the average any projects that were initially deemed incomplete and then reworked to be deemed completed.**
- 4) In 2024 what was the average time between the first pre-consultation submission date of an application and the final approval date of a project? How does that time compare to the city's prior process? Has that time improved in 2025 so far?**
- 5) What percentage of applications have been deemed "incomplete" after the initial submission?**
- 6) What are the most common reasons a project may be deemed "incomplete"?**
- 7) In 2024 what was the average number of resubmissions as part of the pre-consultation process for individual site plan applications and zoning bylaw applications, respectively?**

Response (Date: 2025-Dec-08)

In recent years, Provincial legislation has had various impacts on the municipal planning process. This response references different legislative time periods for applications based primarily on Bill 109 (in effect from July 1, 2023 to July 6 2024) and Bill 185 (currently in effect since July 6, 2024), which mark a change in provincial rules on pre-consultation and completeness.

Pre-consultation is discussion between a proponent and staff prior to the submission of a complete application to the City. Under Bill 109, this was mandatory, and under Bill 185, it became non-mandatory. The City consistently recommends applicants pre-consult regardless of provincial legislation in order to more successfully advance development applications.

Completeness is a 30-calendar-day period in the *Planning Act* to deem an application complete. A review process to deem an application complete was introduced to implement Bill 109, known as “Phase 3 pre-consultation”. This continued in Bill 185 as known as “completeness-review”. The objective at the time was to implement quality control to enable the provincially mandated timelines to be met by the City.

The accompanying report on the *Development Application Study Policy and OPA 47: Housing Acceleration update report (ACS2025-PDB-PS-0075)* describes how the City is updating the completeness process to address the concerns raised by staff, industry and were the subject of this inquiry.

1. On average how many development applications does a typical planning employee have responsibility for at any one-time, including pre-submissions?

On average, including pre-consultation files, a staff member may be assigned up to 35 development review files at any given time. Context is important to frame the file carriage average:

- Not every file has the same work tasks for each team member
- Post approval clearing of conditions for a site plan is less onerous than the review process to grant a decision, not every file is at the same stage and requires the same amount of attention
- Post approval files also get transferred to others as staff turnover occurs. Managers and senior staff often get assigned these files.

Since spring 2023, Planning Services have implemented a team approach for Planning Services, as reported to Council in the Bill 109 Phase 2 Implementation report

([ACS2023-PRE-GEN-0004](#)). Prior to that, the former approach to development application review was that one planner and one project manager (engineer) managed all tasks for a file from pre-consultation to end of post-approval, including report drafting, comment review and response, posting the sign, interaction with applicants, Councillors and the public.

Progress of the file was affected when leads were on leave or changed positions, and when more senior staff did not have enough capacity to undertake mentoring.

The newer team approach assigns tasks to the “right level, right job, right fit”. The objective is to build in mentorship opportunities for all staff and provide exposure to a variety of application types. Starting with Pre-Consultation and moving through post-approval of the associated application(s), the team members each complete different tasks, while supporting one another. Each file now has a team composed of two to three planners (ranging from Planner 1, 2 and 3) and two to three engineers (ranging from Engineer in training, Project Manager to Senior Project Manager), depending on the complexity of the file. The more senior staff carry more files providing guidance, advice and an escalation function, while the bulk of the work is completed by the other team members. The concept builds in mentorship, and cover-off to keep the file moving forward.

2. Since Council implemented a 90-day window to review individual site plan applications and a 120-day window to reviewing zoning applications in September 2024, what percentage of applications have been approved within the new approval targets of 90 or 120 days?

In September 2024, the Bill 185 implementation report ([ACS2024-PDB-PS-0067](#)) spoke to measuring the City’s performance based only on the segments of time when staff are in control of the development application, as opposed to measuring the total amount of time from submission to decision. Permitting applicants to resubmit means that they agree to work on their proposal and extend the timeline, outside of the City target. Document 5 of that report provided some additional details on the segments of time that formed the City target. For example, for a zoning by-law amendment under Bill 185, the following targets were applied:

- Completeness-review: 30 days
- Circulation: 45 days
- Applicant requested resubmissions: 45 days
- Decision: 45 days

Should an application be deemed incomplete, an additional 30 calendar days would have been observed for staff review upon submission of revised documents by the applicant. The time the applicant took to resubmit their documents is not counted towards the staff target, meaning the clock stopped. Following circulation, should an applicant request to resubmit new documents to address City comments, the time the applicant takes to resubmit does not count towards the staff target.

For example, a joint Zoning and Site Plan Control application was deemed incomplete once, and also the applicant requested a resubmission. The City target for this example would be:

- Completeness-review: 30 days
- Second completeness-review: 30 days
- Circulation: 45 days
- Applicant requested resubmission: 45 days
- Decision: 45 days
- Total: 195 days

Between September 2024 and June 2025, 84 Site Plan Control files were approved within a 90-calendar day timeline from the start of completeness to decision. This represents an on-time rate of 96.4 per cent.

Between September 2024 and June 2025, of the 29 Zoning By-law Amendment files approved, 28 were approved within a 120-calendar-day timeline from the start of completeness to decision, representing 97 per cent on-time rate.

The Office of the Auditor General (OAG) – Audit of Development Application Review ([ACS2025-OAG-BVG-010](#)) in document 1, under recommendation 7, speaks to data on completeness by applications for which a decision was rendered in that calendar year. The findings showed an increasing timeframe for staff to render a decision on complex site plan control applications, including more time in both the completeness and review processes (451 days in 2022, 505 days in 2023, and 553 days in 2024).

The Auditor measured year over year volumes for application with decisions, and the above data is measuring the journey of an application by year of receipt. While the Auditor showed a marginal decrease year over year (see Document 1, Chart 4 from the auditor's report), timelines on the most recent applications are trending in the right direction, meaning that for more recent applications (submitted since June 2024), the

City is meeting its timeline commitments.

3. Since adopting the new process, on average, how many days does the City require to deem an application complete? Please include in the average any projects that were initially deemed incomplete and then reworked to be deemed completed.

Since adopting the new Bill 185 process in September 2024 and until July 1, 2025, of the 124 files that have been approved out of 325, the average number of days it has taken to achieve completeness is 49 days. This extension in the timeline is due to an increase in the amount of review of studies and plans prior to submission, in order to ensure the refunds were not issued for missed timelines as required under Bill 109.

Table 3.1 below illustrates the average number of days from first submission to being deemed complete, for files that obtained approval in 2023 and 2024.

Table 3.1: Average Number of days, from submission to being deemed complete

Year	Site Plan Completeness			Zoning By-law Amendment		
	Total time in days	Applicant time in days	City Time	Total time in days	Applicant time in days	City Time
2023	108	56	52	63	43	20
2024	168	98	70	89	40	49

As of February 2, 2026, the City will be shifting from a completeness-review, towards a completeness-check, as described in ACS2025-PDB-PS-0075. Provided that submission documentation is of high quality, this change in process will achieve significant time savings from applicants. The check is meant to enable Development Review staff to only verify the documents are present, done by the appropriate professional, and that payment has occurred, as opposed to a review which included a thorough internal circulation to subject matter experts to verify the content of the documents.

4. In 2024 what was the average time between the first pre-consultation submission date of an application and the final approval date of a project? How does that time compare to the City’s prior process? Has that time improved in 2025 so far?

Pre-Bill 109, meaning for applications received prior to June 30, 2023, the average time from submission of the pre-consultation to the approval of the development application

was 3.8 years or 1,376 days.

During Bill 109, meaning for applications received between July 1, 2023 and June 6, 2024, the average number of days was 1.19 years, or 436.80 days.

Since June 7, 2024, which marked the end of Bill 109, all Site Plan Control and Zoning By-law Amendment files have met the City targets (see question 2). The data below show the total sum of time in calendar days, including applicant time

Table 4.1: Average days from first Pre-consultation Submission to Approval of Development Application

Era	Site Plan (days)	Total Applications Processed
Pre Bill 109	1318	214
Bill 109	247	7
Bill 185	433	46

Era	Zoning By-law Amendment (days)	Total Applications Processed
Pre Bill 109	1444	178
Bill 109	227	20
Bill 185	423	45

It is important to note that the total number of days above includes time when the applicant may be doing additional work, reviewing staff comments, or not proceeding due to factors, such as market conditions.

5. What percentage of applications have been deemed “incomplete” after the initial submission?

Applications for Site Plan and Zoning generally require multiple rounds of review to be deemed complete. Staff have noted an overall decline in application completeness, between 2023 and 2024. Data for 2025 has not been analyzed, but staff have observed the same trend anecdotally.

Table 5.1: Resubmission from Deemed Deficient or Incomplete

Year	File Type	Resubmissions from deemed deficient or incomplete
2023	SPC	40%
2023	ZBA	18%
2024	SPC	81%
2024	ZBA	34%

Zoning files are generally deemed complete more often, due to Surplus Farm Severances, which are simpler. If this category of applications were excluded, staff would expect the number of incomplete applications to be higher.

5.2 Number of Submissions During Completeness Stage

Year	File Type	Average Number of Completeness Submissions
2023	Site Plan	2.4
2024	Site Plan	2.16
2023	Zoning By-law Amendment	2
2024	Zoning By-law Amendment	1.48

While the number of applications that are deemed incomplete has been increasing, there has been improvement on the number of cycles that is required to achieve completeness.

As of February 2, 2026, the City will be shifting from a completeness-review, towards a completeness-check, as described in ACS2025-PDB-PS-0075. This change in process, provided that submission documentation is of high quality, should reduce both the number of files being deemed incomplete and the number of submissions to achieve completeness.

6. What are the most common reasons a project may be deemed “incomplete”?

To review a file for completeness, the City undertakes a 14 calendar day review by Development Review and Subject Matter Experts to:

- Confirm all required plans and studies have been provided.

- Confirm consistency amongst the plans and studies provided.
- Confirm consistency with the applicable Terms of References for each of the proposed plans and studies.
- Provide comments, clearly delineating between “deficiencies” (items that relate to the Terms of Reference and completeness) and “supportability comments” (items that pass judgement on the supportability of the application). Note that supportability comments are not grounds to deem an application incomplete.

Following this review, Development Review staff would either write a complete, or incomplete letter, and share the feedback received thus far for this application.

While this completeness-review function was intended to serve as quality assurance, ensuring documents met a minimum standard of information and consistency in order to enable staff to meet provincial timelines, challenges emerged that added barriers to progressing forward for certain files. Staff and applicants, at times, found it challenging to delineate between general comments on the application (and were not grounds to deem an application incomplete) versus those comments that indicated a deficiency to the terms of reference and were grounds to deem an application incomplete.

With the new completeness-check process introduced via the *Development Application Study policy and OPA 47: Housing Acceleration update report (ACS2025-PDB-PS-0075)*, the City shifts towards a completeness-check, as opposed to a completeness-review, marking a dedicated effort to resolve the challenges described above.

7. In 2024 what was the average number of resubmissions as part of the pre-consultation process for individual site plan applications and zoning bylaw applications, respectively?

After a file has been reviewed and deemed complete, the applicant can choose to proceed to a decision, or resubmit all or part of their application to address staff concerns. In 2024, the average number of submissions for zoning was 1.13 submissions, and the average submission for site plan was 1.71 submissions.

Table 7.1: Average Number of Resubmissions as part of Pre-consultation

Year	File Type	One Submission	Second Submission	Third Submission	Average Number of Submissions
2024	Site Plan	52	21	8	1.71
2024	Zoning By-law Amendment	47	4	1	1.13

Standing Committees / Commission Inquiries:

Demande de renseignements des Comités permanents / Commission :

Response to be listed on the Joint Planning and Housing and Agriculture and Rural Affairs Committee Agenda of December 17, 2025

La réponse devrait être inscrite à l'ordre du jour de la réunion du Réunion conjointe du Comité de l'urbanisme et du logement et Comité de l'agriculture et des affaires rurales prévue le 17 décembre 2025