



CITY OF BRAMPTON

Future State Report

Committee of Adjustment End-to-End Process Review

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Executive Summary

Dillon Consulting Limited, in partnership with Performance Concepts Consulting Inc., was retained by the City of Brampton (the City) to conduct a review of the City's Committee of Adjustment (CofA) business processes and related land use policies. The primary intent of the project, known as the Committee of Adjustment End-to-End Process Review, is to improve the efficiency and effectiveness of the City's CofA processes while also providing excellent customer service. The primary outcome of the project is to reduce the sunk costs associated with CofA applications.

Findings and Recommendations

The Project Team conducted extensive stakeholder engagement efforts with the key business units and external stakeholders involved in CofA service delivery to understand the current state of service delivery. Based on the observations gleaned from the stakeholder engagement activities and analysis of the drivers behind demand for CofA services, the Project Team developed a list of 26 recommendations, grouped according to related types of issues. The issues and associated recommendations are summarized as follows:

Customer Service

The Project Team noted the following key observations regarding customer service issues:

- Applicants cannot apply online, leading to unnecessary expenditure of staff effort to assist and process applications at the intake stage;
- Guiding documentation is not readily available to applicants; and
- Technical staff look for non-compliances unrelated to the details of application at hand.

The recommendations relating to customer service issues are as follows:

- **C1:** Implement CofA processes in public-facing Accela platform (BramPlanOnline)
- **C2-A:** Rationalize approach to identification of extraneous non-compliances
- **C2-B:** Provide training to CofA members regarding implementation of two-track system
- **C3:** Make CofA-specific application reference guides available to the public
- **C4:** Simplify CofA application form

Business Processes

The Project Team noted the following key observations regarding business processes:

- The rigour and consistency CofA process creates a highly inflexible system;
- Applications are deemed complete without any technical review upon intake; and
- There is ample opportunity for automation.

The recommendations relating to business process issues are as follows:

- **B1:** Implement “Preliminary Plan Review” process
- **B2-A:** Modify approach to meeting statutory requirement for hearing applications within 30 days
- **B2-B:** Make sketches available only upon request
- **B2-C:** Implement a fixed cap on number of applications to be heard per CofA hearing cycle
- **B2-D:** Operate multiple Committees of Adjustment (if warranted)
- **B2-E:** Employ a consent agenda approach for CofA hearings
- **B2-F:** Provide training to CofA members regarding consent agenda approach
- **B3:** Employ streamlined approach to mailing processes
- **B4:** Employ simplified reporting template for files where staff have no objections

Staffing/Resources

The Project Team noted the following key observations regarding staffing/resources:

- The consistent and rigorous application of the current CofA business process model is having a direct negative impact on staffing/resources; and
- There is no slack in the pool of staffing/resources but peaks in file volumes

The recommendations relating to staffing/resources are as follows:

- **S1-A:** Forego in-person site visits, or employ less labour-intensive approach to site visits
- **S1-B:** Provide training to CofA members regarding implementation of changes to site visit procedures
- **S2:** Employ streamlined approach to provision of notice signs
- **S3:** Streamline processes to reduce workload and/or add staff resources

Use of Technology

The Project Team noted the fact that the Accela platform is used in a limited capacity for CofA processes as an overarching issue. Accordingly, the recommendations relating to use of technology are as follows:

- **T1/T2/T3:** Implement CoA processes in existing Accela platform (BramPlanOnline)

Amendments to Regulatory Frameworks

The Project Team noted the following key observations regarding the drivers behind demand for CofA services:

- Restrictions in the zoning regulations regarding below grade entrances are driving a substantial portion of applications to the CofA, and many applications relate to exterior side yards on corner lots or side yards in general;
- A sizeable portion of demand for CofA services is driven by zoning regulations regarding maximum driveway widths, and the relief sought is often relatively minor; and

- Current business processes (e.g., site inspections, zoning reviews) may be inducing demand for variances relating to maximum driveway widths.

The recommendations relating to amendments to regulatory frameworks are as follows:

- **P1:** Allow Below Grade Entrances in Exterior Side Yards As-of-Right
- **P2:** Generally Allow Below Grade Entrances in Rear Yard or Side Yard As-of-Right
- **P3:** Apply 5% Increase to Maximum Driveway Widths As-of-Right
- **P4:** Implement Other Process Changes and Monitor Outcomes

Deferrals

The Project Team noted that a sizeable portion of demand for Committee of Adjustment services is driven by deferrals. Accordingly, the Project Team made the following recommendation:

- **O1:** Implement Other Process Changes and Monitor Outcomes

Potential Cost Savings

The Project Team estimated the potential cost savings associated with each recommendation. If all recommendations were implemented, it is estimated that the City could expect potential savings in labour effort of **up to \$1,380 per consent file** and **up to \$1,570 per minor variance file**.

If the volume of applications processed in 2021 is used as a reference for annual savings, it is estimated that the City could stand to save **nearly \$550,000 per year** through the implementation of all recommendations. When examined at the departmental level, it is estimated that annualized gross savings would accrue as follows: **up to approximately \$275,000 in savings for the Clerk's Office, up to \$260,000 in savings for Planning and Development Services, and up to more than \$10,000 in savings for all other departments.**

Compared to an assumed total labour cost of \$1,695,480 for all CofA applications processed in 2021, implementation of all recommendations would represent a **32% reduction in labour costs**.

Given the nature of the recommendations, the Project Team is of the opinion that the City is well positioned to be able to achieve its stated objective of reducing sunk costs associated with CofA service delivery while also providing excellent customer service.

Implementation, Monitoring and Evaluation

The Project Team identified realistic timeframes for implementation of the various recommendations according to the following categories:

- **Do now**, for activities that can and should be undertaken immediately;
- **Do soon**, for activities which should be undertaken within approximately 1 to 2 years; and
- **Do later**, for activities which should be fully executed within approximately 2 to 5 years.

As it proceeds through implementation, the City should prepare end-of-year internal progress reporting on an annual basis. The progress reports should function as a brief summary of what has been achieved in the preceding year, the activities that are actively underway, and the roadmap for remaining implementation activities yet to be undertaken.

1.0 Introduction

1.1 Purpose of Report

Dillon Consulting Limited, in partnership with Performance Concepts Consulting Inc., was retained by the City of Brampton (the City) to conduct a review of the City's Committee of Adjustment (CofA) business processes and related land use policies. The primary intent of the project, known as the Committee of Adjustment End-to-End Process Review, is to improve the efficiency and effectiveness of the City's CofA processes while also providing excellent customer service. The primary outcome of the project is to reduce the sunk costs associated with CofA applications.

The purpose of this report is to:

- Document and summarize key findings and observations regarding the current state of the City's CofA service delivery, including analysis of the impact that land use policy may have on the demand for CofA services;
- Document the recommended process changes and regulatory amendments intended to enable the City to reach its desired future state of CofA service delivery, including the estimated financial benefits associated with those recommendations; and
- Lay the framework for a realistic plan for implementation, including monitoring and evaluation activities.

The findings, observations and recommendations presented in this report represent an encapsulation of data provided by the City, extensive feedback collected from internal and external stakeholders, and the analysis provided by the Project Team over the course of the project.

1.2 Structure of Report

This report is structured as follows:

- **Section 2.0** offers an overview of current state business processes relating to the delivery of CofA services;
- **Section 3.0** summarizes relevant data collected from the City relating to the current state of CofA service delivery and as part of the peer benchmarking exercise, including analysis of the drivers behind application volumes and deferral outcomes;
- **Section 4.0** summarizes the key themes and process-related issues and opportunities for improvement identified during the current state stakeholder engagement efforts;
- **Section 5.0** summarizes the recommended future state process improvements and opportunities for targeted amendments to policy and regulatory frameworks, as well as a high level estimate of potential cost savings associated with implementation of the recommendations; and

- **Section 6.0** offers a phased plan to implement, monitor and evaluate the future state recommendations.

The following information has been included in the appendices:

- **Appendix A** includes depictions of the current state CofA business processes in the form of high-level, conceptual process maps.

2.0 Overview of Current State Processes

2.1 Background

The City of Brampton, located in the Region of Peel, is currently Canada's 9th largest City and one of the fastest-growing. The City's current population currently sits at 680,000 and is expected to reach 1 million by 2051. Currently its growth is most evident in the review of development application activity data revealing a 50% increase in all types of applications submitted to the City between 2019 and 2021. The City of Brampton's Committee of Adjustment (CofA) applications (both Minor Variance and Consent) have increased by 40% in the same time period.

2.2 Committee of Adjustment Service Delivery

As authorized by the Planning Act, the CofA deals with matters of:

- Minor Variances – The Committee of Adjustment may grant a minor variance to any City of Brampton's zoning by-law in respect to land, buildings or structures or use thereof.
- Consents – The Committee of Adjustment may grant consent with respect to the following transactions:
 1. New lot
 2. Leases over 21 years
 3. Mortgage or partial discharge of a mortgage
 4. Foreclosure or exercise of power of sale
 5. Rights-of-way and easements over 21 years
 6. Lot line adjustments
 7. Corrections to deeds or property descriptions

The current CofA is structured with the Secretary-Treasurer through City Clerks working with the CofA Development Planner to coordinate the technical review of CofA Applications. Technical staff will review, comment and provide recommendations to the Committee of Adjustment for a decision on these matters.

The CofA meets once every three (3) weeks (17 scheduled meetings year) to review applications of Minor Variance and Consent. CofA applications need to be processed within about 20 business days from when an application is received to the scheduled hearing date because the approach is to assign applications to specific hearing dates based on an intake deadline. The current CofA service delivery process is shown as three phases identified in **Appendix A**.

The following sections of the report describe the three main phases of the CofA process and identify the roles of key stakeholders within the process. For the purpose of the subsections below we have

approximated the days for each phase with the exception of Day 1 representing the filing deadline, and Day 20 representing the corresponding Hearing date.

2.2.1 Intake Phase (Days 1-2)

Each of the scheduled Committee of Adjustment Meetings is tied to a filing deadline in which applicants must submit a complete application for a CofA meeting date. Applicants must file a “complete” application with the Secretary-Treasurer of the Committee through the office of the City Clerk.

The Secretary-Treasurer will screen applications, confirming that the required fields in the application form have been completed, confirming that applicable fees documents have been submitted. Furthermore the Secretary-Treasurer can commission applications and accept hard copy applications on site at City Hall. If a hard copy application is received, staff then scan the application for storage in Accela.

Internal business units are geographically isolated from each other (i.e., Zoning sits in a different building, separate from Planning and the offices of the City Clerk), such that applicants might be asked to access two separate buildings to make a single CofA application.

Once an application is deemed complete a hearing date is assigned and the application materials are uploaded by the Secretary-Treasurer to the City’s development approvals software platform, Accela (also known as BramPlanOnline). Once uploaded to Accela, the application materials are circulated internally to business units at the City and external agencies (i.e., Conservation Authorities and the Region of Peel) for comment and input.

2.2.2 Prehearing Phase (Days 7 – 19)

Technical staff are assigned applications and will complete a desktop review to confirm adequacy and content for each submitted application. If submitted applications are insufficient, technical staff will work with applicants to obtain the necessary information to complete their review. Furthermore both the assigned Development Planner I (“CofA Planner”) and Zoning Examiner will complete separate site visits to complete their respective reviews prior to the Cross Functional Team Meeting.

A regularly scheduled Cross Functional Team Meeting takes place at the halfway point in the CofA process, where external and internal agencies share comments and discuss recommendations for the Committee related to each application. It is at this point in which the CofA agenda is organized and where public notices are prepared/issued for Minor Variance applications, ten days prior to the scheduled hearing date as required by the *Planning Act*. For Consent applications, the *Planning Act* requires that public notices be issued fourteen days prior to the scheduled hearing. Consent applications are reviewed after the public notice is issued and if there are changes to the application, current City policies require that a new public notice be issued and that a recommendation be made to defer the application.

Public notices are prepared and coordinated by the Secretary Treasurer and the office of the City Clerk. The notices are printed, manually labelled and mailed out by staff in that office. The *Planning Act* requires that neighbouring property owners within 60 metres of the subject lands be notified of the CofA hearing for both consents and minor variance applications. Additionally, current City policy requires that the Secretary-Treasurer be on site at City Hall to hand over the public notice sign(s) to applicants and confirm signs were received/posted through the completion of a waiver.

Upon receiving comments from internal business units, external agencies and the public, the CofA planner will begin to compile received comments for the staff report for each application. Once finalized, the Secretary Treasurer will issue the staff report to applicants and will package reports into the final agenda.

2.2.3 Hearing and Post Hearing Phase (Day 20 +)

The scheduled public hearing takes place on Day 20 of this process. The Committee can respond to a matter before it in one of three ways:

1. Render decisions to approve an application;
2. Render decisions to refuse an application; or
3. Move to defer an application for consideration at a future hearing.

Decisions of either approval or refusal will lead to the provision of a Notice of Decision which is prepared by the Secretary Treasurer following the hearing. The Notice of Decision is issued by the Secretary Treasurer, with circulation to both the applicant and interested parties. The preparation of the Notice of Decision follows a similar manual process as the mail out of public notices in the noted in the Pre-Hearing Phase. A decision, whether it be an approval or refusal, is subject to an appeal period. The timing of the appeal period varies based on the type of application: for Consent applications, the appeal period is twenty days from the mailing of the decision; for Minor Variances, the appeal period is twenty days from the oral decision of the Committee was rendered. If an appeal is received for a decision it will move forward to the Ontario Land Tribunal to be resolved.

Approved decisions that are not appealed will receive a Final & Binding notice, as coordinated by the Secretary Treasurer. If the decision rendered by the Committee of Adjustment is subject to conditions, the CofA Planner will coordinate the fulfillment of those conditions, while the Secretary-Treasurer will follow up with applicants as required. If there are no conditions or conditions have been fulfilled, the CofA Planner will file the reports/documents/clearances and update Accela to close out the file with the office of the City Clerk.

In cases where staff have recommended deferral of an application in the Staff Report, the Committee asks the applicant during the hearing if they are in agreement with the deferral and based on this discussion, the Committee will issue a deferral to the agreed-upon date. The *Planning Act* requires a

new public notice for deferred Minor Variance applications, whereas City policy requires a new public notice for deferred Consent applications. Both deferred Minor Variance and Consent applications will often be reviewed again at the corresponding Cross Functional Team Meeting.

3.0 Current State Data Analysis

3.1 City of Brampton Data

Specific data was requested in order to supplement and contextualize the feedback collected during stakeholder engagement sessions. The Project Team requested the following data from the City in relation to CofA service delivery:

- Application Volumes for 2019, 2020 and 2021
 - Breakdown of Application types (e.g., Consents vs Minor Variance);
 - Type of Development (Residential, non-residential);
 - Approved/Deferred Applications.
- Application timeframes for 2021 – time required to process CofA applications by application type;
- Staff Effort for 2021 - the amount of staff effort needed to process CofA files; and
- Staffing Requirements for 2021 - amount of staff effort needed to process CofA files.

It must be noted that the City's ability to provide the requested data was limited by the degree to which the data was tracked in the first place. The software platform employed by the City to manage development approvals processes, Accela, is only put to limited use in relation to CofA processes. Accordingly, the data the City was able to retrieve from Accela for this review was limited to application volumes for 2020 and 2021, broken down by application types. The City could not provide data for application volumes for 2019 as that data was previously tracked on an alternative system.

The following section offers a high-level summary of data collected pertaining to the current state of delivery of CofA services at the City, including an analysis of the drivers of demand for CofA services.

3.1.1 Application Volumes

The volume of applications heard at each meeting over the course of 2020-2022 is depicted in the following figures: **Figure 3-1** depicts the volume of consent applications heard at each hearing, and **Figure 3-2** depicts the volume of minor variance applications heard per hearing.

Two notable outliers were captured in the data. The first outlier occurs in 2020 in which Meeting Numbers 5 to 9 were cancelled due to the COVID-19 pandemic. The second data outlier relates to Meeting 8 in 2022 during which a seventy-lot subdivision required a variance to ameliorate a zoning deficiency common to each lot; while a separate application was filed for each lot, the applications were collectively handled together as a bundle.

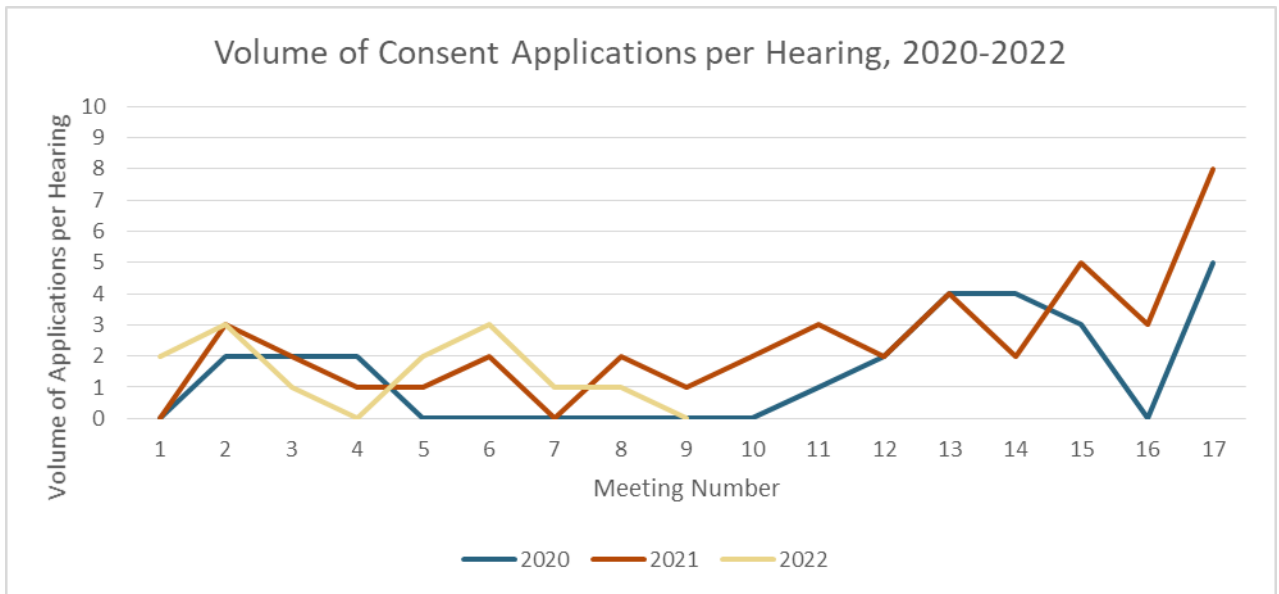


Figure 3-1: Volume of Consent Applications per Hearing, 2020 - 2022

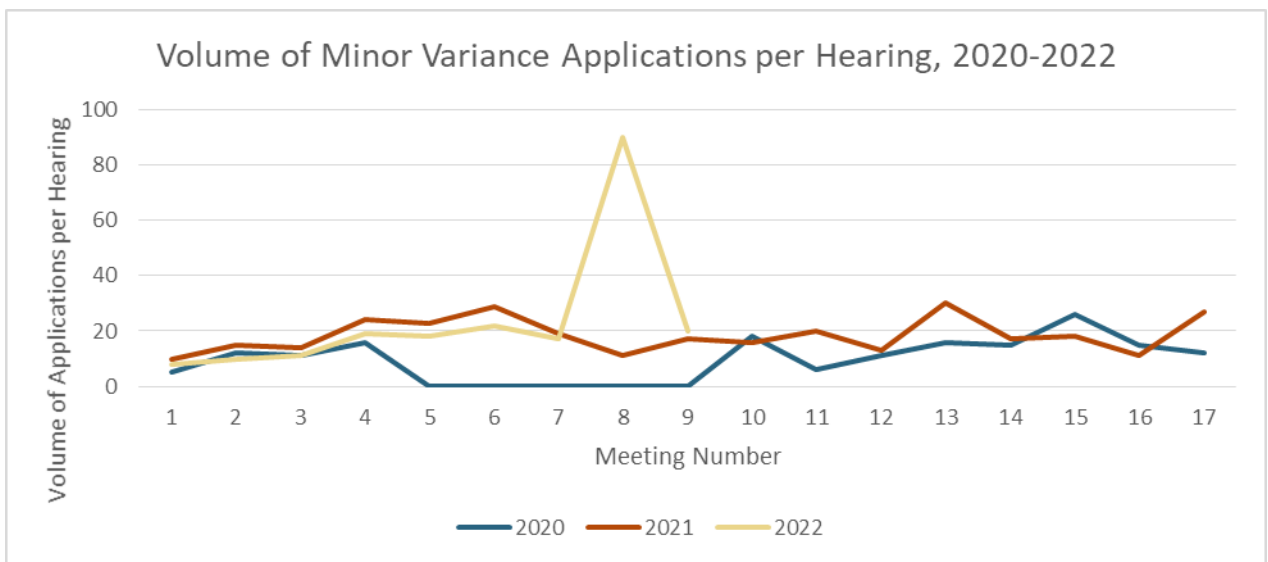


Figure 3-2: Volume of Minor Variance Applications per Hearing, 2020 - 2022

The application volume data shows that while per-hearing application volumes are highly volatile from one meeting to the next, the City has experienced a general increase in the number of applications dealt with at CofA hearings since 2020. The volume of consent applications ranges from one to eight per hearing, whereas Minor Variance applications range from five to thirty per hearing (not including the Meeting 8 outlier in 2022).

3.1.2 Typical Processing Timelines and Staff Effort

Given the limitations in the City's data tracking for CofA files, the available data was supplemented by discussions with City staff.

Staff confirmed the average timeline for all CofA applications to be approximately 21-23 days from application submittal to hearing date using the rigid CofA schedule.

Staff estimated the average number of hours they would typically expend on the processing of CofA applications, the results of which are summarized in **Table 3-1**. The effort estimates were broken down into the following subcomponents:

1. The average effort spent from the point of intake to the point of holding the Cross Functional Team Meeting, which includes hours spent on the initial inquiry, review of the application technical staff, issuance of the public notice, and attendance at the Cross Functional Team Meeting.
2. The average effort spent on staff reports, which includes the effort required for the preparation of staff reports, effort spent by the Secretary-Treasurer on circulating the report to CofA Members and the applicant, and effort spent by the CofA Planner collecting and reviewing comments.
3. The average effort spent on attending CofA hearings, which includes attendance by the CofA Planner, Development Manager, Zoning Examiner and Secretary-Treasurer.

The effort estimates provided by staff did not include effort associated with tasks relating to appeals and fulfillment of conditions of approval.

Table 3-1: Average staff hours spent per CofA file by type of application

	Consent Applications	Minor Variance Applications
Average total staff hours spent per file, from initial inquiry to cross-functional team meeting – for all staff involved, as estimated by staff	21.74 hours	29.83 hours
Average total staff hours spent per file, staff reports – for all staff involved, as estimated by staff	6.92 hours	2.33 hours
Average total staff hours spent per file, attending hearings – for all staff involved, as estimated by staff	5 hours	5 hours
Total*	33.66 hours	37.16 hours

***Note:** The average total staff hours was calculated based on anecdotal estimates provided by staff. The review time for a CofA application is based on the scheduling of the CofA hearings.

3.1.3 Staffing Requirements

The City was unable to provide a detailed breakdown of the number of full time-equivalent staff directly assigned to CofA service delivery. In lieu of this, the City was able to provide a listing of staff positions which are generally involved in CofA service delivery (see **Table 3-2**).

Table 3-2: Staff positions involved in CofA service delivery

Department	Job Title
Building Services	Plans Examiner
Clerk's Office	CofA Secretary-Treasurer
	Records Clerk (BRIMS)
Development Engineering	Engineering Manager
	Development Engineering Technician
Environmental Engineering	Engineer
Legal	Legal Counsel, Real Estate, Property, & Development
Parks Open Space	Open Space Manager
	Open Space Design Technician
	Environment and Engineering Clerk
Planning and Development Services	Manager
	Development Manager
	Development Planner I
	Assistant Development Planner
	Development Services Clerk
	Business Services Clerk
	Zoning Manager
	Zoning Officer
Plans and Permits	Plans Examiner (Zoning)
Policy Planning	Heritage Planner
	Policy Planner
Traffic Services	Transportation Planning Technologist
Transportation Planning	Project Manager
	Transportation Planner

3.1.4 Patterns in Committee of Adjustment Applications

In order to identify opportunities to reduce the number of applications needing to be considered by the CofA – i.e., in order to reduce the demand for CofA services – one must have an understanding of the land use policies that may be triggering the need for the CofA process. Applications to the CofA fall into two categories:

- Applications for consent, which deal with the subdivision of land outside of the Plan of Subdivision process (e.g., severances) and with the conveyance of interests in land (e.g., easements, long-term leases); and
- Applications for minor variances, which deal with relief sought from specific zoning regulations.

Applications for minor variances are directly linked to policy triggers which the City has broad powers to change (i.e., the City's Official Plan and zoning by-law). Conversely, the policy triggers for applications for consent are either defined by the City in its Official Plan (e.g., in cases of subdivision of land outside of the Plan of Subdivision process) or otherwise tied to statutory measures defined solely by provincial legislation which the City cannot directly influence or change (i.e., the *Planning Act*). While the City has meaningful influence over the policy triggers that lead to consent applications, anecdotal observations from the current state working sessions indicated that staff did not perceive consent applications as problematic or in need of further investigation.

Accordingly, in order to identify opportunities to reduce the demand for CofA services, the Project Team elected to direct its analytical focus on identifying any apparent patterns in the policy triggers driving the need for applicants to seek relief from zoning regulations by way of minor variances.

In order to execute the kind of analysis needed to reveal such patterns, the project team examined the minutes of a set of CofA hearings so as to build a dataset which logged all the applications involving minor variances. A representative sample of applications was defined which included all applications heard at CofA hearings held on the following dates:

- January 4, 2022;
- January 25, 2022;
- February 15, 2022;
- March 8, 2022;
- March 29, 2022; and
- April 19, 2022.

Over the course of January to April 2022, a total of 83 unique minor variance applications were heard by the CofA, involving a total of 202 separate variances under consideration.¹ For every application heard within that period, each individual variance was coded using the following categories:

- The general category of relief being sought (e.g., variances for relief from zoning provisions relating to below grade entrances); and
- The sub-category of specific relief being sought (e.g., a provision prohibiting below grade entrances in a yard located between the main wall of a dwelling and a flankage lot line).

3.1.4.1 Trends in Minor Variance Applications

Of the 83 unique minor variance applications heard during the sample period, the following categories of zoning regulations constituted the five most-frequently cited:

- Relief sought in relation to below grade entrance regulations accounted for the largest single share of applications (29% of all minor variance applications);
- Relief sought in relation to setback regulations not related to below grade entrances accounted for 27% of all minor variance applications;
- Relief sought in relation to permitted uses accounted for 17% of all minor variance applications
- Relief sought in relation to landscaping regulations accounted for 16% of all minor variance applications; and
- Relief sought in relation to driveway regulations accounted for 16% of all minor variance applications.

Table 3-3 lists the count of minor variance applications sought during the sample period, broken down by category of relief sought.

Table 3-3: Count and share of all minor variance applications by category of variance, January 2022 - April 2022

Category of Variance Sought	Count of unique applications involving variances	Share of all unique applications involving variances
Below grade entrance	24	29%
Setback	22	27%
Permitted uses	14	17%
Landscaping	13	16%
Driveway	13	16%
Parking	11	13%
Building dimensions	10	12%
Lot dimensions	7	8%
Lot coverage	7	8%
Accessory structure	6	7%

¹ A total of 88 files were heard at the Committee within that period, meaning several files were heard more than once.

Category of Variance Sought	Count of unique applications involving variances	Share of all unique applications involving variances
Garage door	5	6%
Path of travel to second unit	4	5%
Floor space index	4	5%
Above grade door	3	4%
Deck	3	4%
Fence	3	4%
Porch	2	2%
Below grade window	2	2%
Detached garage	1	1%
Loading spaces	1	1%
Dwelling units	1	1%
Total	83	N/A

Of the 202 separate variances considered during the sample period, the following categories of zoning regulations constituted the five most-frequently cited:

- Below grade entrance regulations accounted for the majority of all variances sought (19%);
- Setback regulations not related to below grade entrances accounted for 17% of all variances sought;
- Driveway regulations accounted for 8% of all variances sought;
- Permitted uses accounted for 7% of all variances sought; and
- Parking regulations accounted for 7% of all variances sought.

Collectively, the “top 5” categories noted above accounted for 58% of all variances sought during the sample period. **Table 3-4** lists the share of all variances sought during the sample period, broken down by category of relief sought.

Table 3-4: Count and share of all variances sought by category of variance, January 2022 - April 2022

Category of Variance Sought	Count of variances sought	Share of all variances sought
Below grade entrance	38	19%
Setback	34	17%
Driveway	16	8%
Permitted uses	15	7%
Parking	15	7%
Landscaping	13	6%
Building dimensions	12	6%
Accessory structure	11	5%
Lot dimensions	9	4%
Lot coverage	8	4%
Garage door	5	2%

Category of Variance Sought	Count of variances sought	Share of all variances sought
Above grade door	4	2%
Path of travel to second unit	4	2%
Floor space index	4	2%
Deck	3	1%
Fence	3	1%
Below grade window	2	1%
Porch	2	1%
Detached garage	2	1%
Loading spaces	1	0%
Dwelling units	1	0%
Total	202	100%

3.1.5 Drivers of Deferrals

The Committee can render the following decisions in relation to a given application:

- Approval, with or without associated conditions which must be satisfied;
- Refusal; or
- Deferral, in which case the application file remains “active” with the intent that it be considered again at a future hearing.

The Project Team placed particular analytical focus on identifying any apparent patterns in the frequency and nature of deferrals, as these represent applications that inherently require greater expenditure of resources by the applicant, staff, and the Committee. The Committee may elect to defer its decision on an application for a variety of reasons, including:

- Applications which are withdrawn by the applicant prior to the hearing;
- Requests by the applicant to defer the file to a future hearing;
- On the advice of staff, such as in situations where staff are aware of forthcoming modifications to the nature of the application or the provision of further information by the applicant or other parties, or instances where staff want more time to review and/or discuss the application with the applicant; and
- Situations where the Committee is not satisfied that they are able to reach a decision, such as instances where the Committee concludes that they do not have sufficient information to reach a decision, or where the judgements of Committee members do not align with staff recommendations, or where some related, external process must be completed (e.g., assumption of a subdivision by the City), or instances where the applicant is not present at the hearing.

The Project Team examined the minutes of CofA hearings so as to build a dataset which logged all the consent and minor variance applications that resulted in deferrals. A representative sample of applications was defined which included all applications heard at CofA hearings held on the following dates:

- January 4, 2022;
- January 25, 2022;
- February 15, 2022;
- March 8, 2022;
- March 29, 2022; and
- April 19, 2022.

For every application heard within that period that resulted in a deferral, each individual application was coded using the following categories:

- Application type (i.e., consent vs. variance);
- The recommendation made by staff (i.e., approval, refusal, or deferral); and

- The apparent reason for the decision to defer as described in the meeting minutes, generalized into relatively broad subcategories.

The following subsections detail the key observations and findings that came out of the analysis of deferrals.

3.1.5.1 Rates of Deferral

Of the 99 applications scheduled for hearings during the sample period, a total of 24 files resulted in deferrals – almost one-quarter of all files scheduled for the period (24%). When broken down by type of application, the following observations become apparent:

- Consent applications were most likely to result in a deferral: 4 out of the 11 applications for consent heard during the sample period resulted in deferral, translating to a deferral rate of 36%; and
- A substantial portion of minor variance applications resulted in deferral: 20 out of the 88 applications for minor variances heard during the sample period resulted in deferral, translating to a deferral rate of 23%.

Table 3-5 summarizes the count and share of deferred applications scheduled for hearings during the sample period, broken down by application type.

Table 3-5: Count and share of deferred CofA applications by type of application, January 2022 - April 2022

Hearing Date	Consent Applications Heard	Deferred Consent Applications	Deferral Rate, Consent Applications	Minor Variance Applications Heard	Deferred Minor Variance Applications	Deferral Rate, Minor Variance Applications
January 4, 2022	2	1	50%	8	1	38%
January 25, 2022	3	1	33%	10	1	20%
February 15, 2022	1	0	0%	11	1	9%
March 8, 2022	0	0	N/A	19	5	26%
March 29, 2022	2	1	50%	18	5	28%
April 19, 2022	3	1	33%	22	7	32%
Total	11	4	36%	88	20	23%

3.1.5.2 Reasons for Deferral

Of the 24 applications scheduled for hearings during the sample period which resulted in a deferral, the following categories constituted the most-frequently cited reasons for deferral:

- Almost half (46%) of deferral decisions cited the need to provide additional time for the applicant to amend the details of their application (e.g., include missing information or revised plans);
- One-quarter (25%) of deferral decisions cited the need to provide additional time for the applicant to submit or revise related technical studies;
- Almost one-fifth (17%) of deferral decisions cited the need to provide additional time for the submission or completion of related development approvals processes (e.g., submission of Site Plan Control application; assumption of subdivisions by the City; or completion of ongoing appeals); and
- Less than one-tenth (8%) of deferral decisions cited the need to provide additional time for the applicant to obtain necessary approvals or input from interested third parties (e.g., railway operators).

Table 3-6 summarizes the most frequently cited categories of deferral decisions for applications scheduled for hearings during the sample period, broken down by count and share of application type.

Table 3-6: Count and share of deferred applications by reason for deferral, January 2022 - April 2022

Reason for Deferral	Deferred Applications	Share of Deferred Applications	Deferred Consent Applications	Share of Deferred Consent Applications	Deferred Minor Variance Applications	Share of Deferred Minor Variance Applications
Provide sufficient time for the applicant to amend the application	11	46%	2	50%	9	45%
Provide sufficient time for the applicant to submit or revise technical studies	6	25%	1	25%	5	25%
Provide sufficient time for submission or completion of related development approvals process	4	17%	1	25%	3	15%
Provide sufficient time for applicant to obtain approval from third party (e.g., railway)	2	8%	0	0%	2	10%
No representatives at hearing	1	4%	0	0%	1	5%
Total	24	100%	4	100%	20	100%

3.2 Peer Benchmarking Comparison

The original scope of work called for a comparison of the City to similar peer comparator municipalities so as to better contextualize the nature of CofA service delivery. In consultation with the City, the Project Team identified the following six municipalities to serve as peer comparators:

- City of Hamilton;
- City of Markham;
- City of Mississauga;
- City of Toronto;
- City of Vaughan; and
- Town of Oakville.

The Project Team requested the following data from the peer comparators in relation to their CofA service delivery:

- Application Volumes for 2019, 2020 and 2021
 - Breakdown of Application types (e.g., Consents vs Minor Variance);
 - Type of Development (Residential, non-residential);
 - Approved/Deferred Applications.
- Application timeframes for 2021 – time required to process CofA applications by application type;
- Staff Effort for 2021 - the amount of staff effort needed to process Committee of Adjustment files; and
- Staffing Requirements for 2021 - amount of staff effort needed to process Committee of Adjustment files.

Despite best efforts by the City, only limited data was received from the City of Toronto in advance of the reporting timeline associated with this report. Accordingly, the City and the Project Team elected to change approach and instead offer brief descriptive details pertaining to how CofA services are known to be delivered at the peer comparator municipalities. A summary of pertinent key differentiators relating to how CofA services are delivered at the peer comparators is given in **Table 3-7**.

Table 3-7: Overview of key differentiators compared to peer municipalities

Key Differentiators	Hamilton	Markham	Mississauga	Oakville	Toronto	Vaughan
Availability of application guide materials	<ul style="list-style-type: none"> Detailed submission requirements listed on application form Example sketch included on application form 	<ul style="list-style-type: none"> Detailed submission requirements provided as separate documents Quick reference guide for use of ePlans system specific to CofA applications provided Example sketches not provided in guide materials 	<ul style="list-style-type: none"> Detailed submission requirements listed on application forms Explanatory guide content offered on City's website Example sketches not provided in guide materials 	<ul style="list-style-type: none"> Detailed explanatory guide specific to CofA processes provided Detailed submission requirements listed on application forms Example sketches not provided in guide materials 	<ul style="list-style-type: none"> Detailed application checklist provided on City's website Example sketches not provided in guide materials 	<ul style="list-style-type: none"> Detailed explanatory guide specific to CofA processes provided Example sketches not provided in guide materials
Method of application intake	<ul style="list-style-type: none"> Applications accepted in hard copy form or via email submission 	<ul style="list-style-type: none"> Applications accepted through online interface 	<ul style="list-style-type: none"> Applications accepted in hard copy form or via email submission 	<ul style="list-style-type: none"> Applications only accepted via email submission 	<ul style="list-style-type: none"> Applications only accepted via email submission 	<ul style="list-style-type: none"> Applications accepted through online interface
Approach to zoning review	<ul style="list-style-type: none"> Application form explicitly states that applicants are responsible for identifying all variances, and that staff will only review the variances applied for Applicants can elect to pay additional fees to have staff review zoning ahead of submission 	<ul style="list-style-type: none"> For variances, applicant can elect to pursue Zoning Preliminary Review process to identify all zoning deficiencies Alternatively, applicant must sign waiver acknowledging that staff will only review variances included in the application Applicant must pursue Zoning Preliminary Review process for consent applications 	<ul style="list-style-type: none"> Applicant can elect to pursue Preliminary Zoning Review process to identify all zoning deficiencies Alternatively, applicant must sign waiver acknowledging that staff will only review variances included in the application 	<ul style="list-style-type: none"> Application form explicitly states that applicants are responsible for identifying all variances, and that staff will only review the variances applied for 	<ul style="list-style-type: none"> Applicant can elect to pursue Preliminary Project Review or Zoning Certificate processes to identify all zoning deficiencies Alternatively, applicant must sign waiver acknowledging that staff will only review variances included in the application 	<ul style="list-style-type: none"> All applications undergo zoning review process after intake, at which point the need for additional variances may be identified If additional variances are identified and a resubmission is required, scheduling of the hearing only occurs once staff confirm all required information has been submitted
Approach to provision of notice sign materials	<ul style="list-style-type: none"> Sign equipment provided by City Applicant expected to print and prepare notice materials 	<ul style="list-style-type: none"> Sign equipment and notice materials provided by Town 	<ul style="list-style-type: none"> Sign equipment provided by City Applicant expected to print and prepare notice materials 	<ul style="list-style-type: none"> Sign equipment and notice materials provided by Town 	<ul style="list-style-type: none"> Applicant expected to provide sign equipment and print and prepare notice materials 	<ul style="list-style-type: none"> Applicant expected to provide sign equipment and print and prepare notice materials
Approach to scheduling of hearings	<ul style="list-style-type: none"> Hearing dates are assigned only after staff are satisfied that the application can be considered "complete" Meetings typically held three times per month; additional hearing can be held if needed 	<ul style="list-style-type: none"> Hearing dates are assigned at the discretion of the Secretary-Treasurer Meetings typically held two times per month, with exception of January and December 	<ul style="list-style-type: none"> Hearing dates are assigned after application fees are received Meetings typically held three times per month; more than one meeting may be held on the same date 	<ul style="list-style-type: none"> Hearing dates are assigned only after staff are satisfied that the application can be considered "complete" Meetings typically held every other Tuesday 	<ul style="list-style-type: none"> Hearing dates are assigned only after staff are satisfied that the application can be considered "complete" Meetings held between two to four times per month, with frequency varying by geography; more than one meeting may be held on the same date 	<ul style="list-style-type: none"> Hearing dates are assigned only after staff are satisfied all necessary information has been provided Meetings typically held every 3 weeks; additional hearings can be held if needed

Key Differentiators	Hamilton	Markham	Mississauga	Oakville	Toronto	Vaughan
Approach to delivering Committee hearings	<ul style="list-style-type: none">A single committee hears all applications	<ul style="list-style-type: none">A single committee hears all applications	<ul style="list-style-type: none">A single committee hears all applications	<ul style="list-style-type: none">A single committee hears all applications	<ul style="list-style-type: none">Four committees operate on basis of pre-amalgamation boundaries, with some committees being comprised of more than one panelCommittee can elect to render decisions on uncontested applications at the beginning of a hearing	<ul style="list-style-type: none">A single committee hears all applicationsCommittee can elect to render decisions on multiple related files at the same time

4.0 Current State Observations

4.1 Current State Stakeholder Engagement Efforts

The Project Team conducted extensive stakeholder engagement efforts with the key business units and external stakeholders involved in CofA service delivery to understand the current state of service delivery. As part of these efforts, the following stakeholder engagement sessions were held:

- Engagement Session #1 with Brampton CofA Staff – May 11, 2022;
- Engagement Session #2 with Brampton CofA Staff – May 12, 2022;
- Engagement Session #3 with Brampton CofA Staff – May 13, 2022;
- Engagement Session #4 with Credit Valley Conservation and Region of Peel – May 20, 2022;
- Engagement Session #5 with Brampton Senior Management – May 26, 2022;
- Engagement Session #6 with Brampton Zoning Staff – May 27, 2022;
- Engagement Session #7 with CofA Members – May 31, 2022;
- Engagement Session #8 with Brampton City Clerks – June 3, 2022;
- Engagement Session #9 with Brampton Planning Staff – June 3, 2022; and
- Engagement Session #10 with TRCA – June 9, 2022.

The following subsections of this report summarize the observations made by the Project Team throughout the course of the current state stakeholder engagement efforts, categorized into key themes.

4.2 Customer Service

The following sections summarize the key observations noted during the stakeholder engagement sessions regarding customer service.

4.2.1 What is Working Well

The City prides itself on offering good customer service and the consulting team noted a high degree of interaction between CofA staff and applicants. We understand that staff regularly follow-up with applicants in the lead-up to a hearing to request the information needed to facilitate approval rather than deferral of an application. The vast majority of approved CofA applications and very minimal appeals to the Tribunal are also indicative of the high level of customer service delivered.

4.2.2 Opportunities for Improvement

The high degree of customer service provided masks a weakness at the CofA for applicant self-service. There is no ability to apply online, for example, and while an explanation is provided for drawing requirements for a variance, an example sketch is not readily available. Furthermore technical staff actively look for non-compliances unrelated to the details of the application at hand – under the guise of

customer service – but this means additional effort is expended and contributing to the strain on the CofA process.

4.3 Business Processes

The following sections summarize the key observations noted during the stakeholder engagement sessions regarding business processes.

4.3.1 What is Working Well

Brampton's CofA has rigours and consistent business processes that are very commendable. Applicants can expect both a scheduled hearing date and decision if they submit a complete application, because intake windows are tied to pre-scheduled CofA hearing dates. Given the rigorous and consistent application review timeline, we observed that technical staff are highly consistent in their review of CofA applications which must be completed within the given 21-23 business days timeline (including site visits, cross-function team meeting, report writing, etc.).

4.3.2 Opportunities for Improvement

CofA applications are deemed complete without any technical review of the submitted documents, meaning technical staff may be left with insufficient time to properly review applications due to expensed time rectifying poor quality submissions. Adding to this strain is the City's practice of seeking other zoning compliance matters beyond what was applied for (as noted above) which thereby makes the variance process a mechanism to enforce compliance with the Zoning By-law.

Furthermore, several business processes which should arguably be automated are currently completed manually (e.g., the issuance of public notices and Notices of Decisions involves staff manually printing and affixing labels to these deliverables – tasks which can be completed by machine).

The rigour and consistency also creates a highly inflexible system, and as file volumes have increased (or when they peak), there is no method to manage the sudden intensity of work when the CofA is faced with a large number of applications on a specific hearing date.

4.4 Staffing/Resources

The following sections summarize the key observations noted during the stakeholder engagement sessions regarding staffing and resources.

4.4.1 What is Working Well

The Project Team noted a high degree of adaptability and dedication with staff even under the duress of increasing volumes and complex nature of CofA applications. Staff have shown the ability to address complex CofA applications within a multi-disciplinary team, as shown in the scheduled Cross Functional

Team Meeting which assists in breaking down silos and provides a forum for technical staff to review applications together. The CofA system provides a vehicle for staff growth and succession planning, allowing junior staff to get familiar with various internal business units and build expertise with planning applications as a stepping stone to more complex planning work at the City.

4.4.2 Opportunities for Improvement

The Project Team observed that the challenges of delivering a high degree of customer service through consistent and rigorous business processes at the Brampton CofA is having a direct negative impact on staffing/resources. The absence of greater customer self-service, requirements for staff to conduct site visits and take measurements, full zoning examination of variance applications, pick-up of notices, and a single development planner assigned to the CofA all point to a significant burden placed on the few number of staff involved in CofA applications. There is little slack in the pool of staffing/resources when there are peaks in file volumes and the number of staff have remained the same even though volumes have increased.

4.5 Use of Technology

The following sections summarize the key observations noted during the stakeholder engagement sessions regarding the City's use of technology in delivering CofA services.

4.5.1 Opportunities for Improvement

Brampton implements the Accela platform in a limited capacity for the CofA process and there is significant room for the CofA to enhance its use of Accela. With respect to CofA business processes, Accela is currently used only to enter application data for data storage purposes – activities which occur largely after the fact. The Accela platform is not used to coordinate processing of CofA applications, and is not set up to accept CofA applications through its public-facing online interface. Accela has the ability to be able to be used as a workflow tool for application circulation and processing, but is not used as such for CofA files.

Furthermore, external agencies are not directly informed of CofA decisions by the City (i.e., staff at external agencies must follow-up with City staff to request decision status updates or obtain public-facing information from the City's website).

5.0 Future State Recommendations

5.1 Optimizing Committee of Adjustment Service Delivery

The preceding review of how the City is currently delivering CofA services indicates that there is plenty of room for improvement. At the same time, the Project Team is of the opinion that the City is well positioned to be able to achieve its stated objective of reducing sunk costs associated with CofA service delivery while also providing excellent customer service.

The Project Team has developed a series of recommendations, refined after extensive input from municipal staff, which will enable the City to achieve that objective within the next several years. The thinking behind the recommendations revolves around the following general themes:

1. Customer service is a key priority for the City, and this can be supported by rationalizing the way that CofA services are delivered in line with reasonable, contemporary expectations for how those services should be delivered.
2. Brampton is a fast-growing urban centre, and its business processes need to be adapted to reflect this reality. It is essential that the CofA system be designed to have the right staff doing the right work. Procedural changes intended to minimize or avoid low value tasks offer the opportunity to increase productivity and support sustainable workloads for staff.
3. Following on the prior point, additional staff resources may need to be part of the approach to servicing the growing demand for CofA services. When coupled with procedural changes, this can offer a multiplier effect in terms of improvements to throughput while also supporting sustainable workloads for staff.
4. Delivering CofA services at increasing scale will require use of modern development approvals processing technologies. The City already has the benefit of an existing software platform (Accela) at its disposal, and the City should begin work to integrate CofA processes into that system so as to capture the efficiency benefits.
5. Opportunities exist to control the demand for CofA services by modifying the regulatory triggers that drive that demand in the first place. Improvements to business processes and resources should be coupled with targeted modifications to the zoning by-law to minimize the need for variances in specific instances.
6. Deferrals can be thought to represent a kind of “waste” which occurs near the end of the CofA process “assembly line”: instead of the process leading to a finished product (i.e., an approval or refusal decision rendered by the Committee), a deferral represents an unfinished product and can point to problems occurring earlier on in the assembly line. Process improvements should result in reduced instances of deferrals.

The following subsections summarize the recommended changes to processes or policies, the stakeholder engagement activities undertaken by the Project Team to refine the recommendations, and the potential cost savings the City stands to capture through implementation of the recommendations.

5.2 Future State Stakeholder Engagement Efforts

The Project Team conducted extensive stakeholder engagement efforts with the key business units and external stakeholders involved in CofA service delivery to “stress test” and validate preliminary future state process improvements and amendments to policy and regulatory frameworks. As part of these efforts, the following stakeholder engagement sessions were held:

- Future State Engagement Session #1 with Brampton City Clerk’s and Zoning staff – August 19, 2022;
- Future State Engagement Session #2 with Brampton Senior Management – August 23, 2022;
- Future State Engagement Session #3 with Brampton Senior Management – August 24, 2022;
- Future State Engagement Session #4 with Credit Valley Conservation Authority and TRCA – August 25, 2022
- Future State Engagement Session #5 with CofA Members – August 25, 2022;
- Future State Engagement Session #6 with Region of Peel – August 26, 2022;
- Future State Engagement Session #7 with Brampton Planning staff – September 7, 2022; and
- Future State Engagement Session #8 with Brampton Planning and Zoning staff – September 14, 2022.

The following subsections list the recommendations developed by the Project Team following their refinement during the future state stakeholder engagement activities.

5.3 Process Improvements

Using the feedback and observations gained from previous phases of the project, the Project Team identified multiple recommendations relating to improvements that the City can make to CofA processes. In keeping with the approach used in categorizing observations noted regarding the current state, each recommendation is paired with an associated issue that it seeks to address, with each pairing grouped according to the categories used in **Section 4.0** of this report.

The recommendations are listed in the following tables:

- **Table 5-1** lists process improvements relating to customer service;
- **Table 5-2** lists process improvements relating to business process;
- **Table 5-3** lists process improvements relating to staffing and resources; and
- **Table 5-4** lists process improvements relating to the use of technology.

A summary of the potential cost savings associated with the recommendations is given in **Section 5.6** of this report.

Table 5-1: Process improvements relating to customer service

Item	Issue	Recommendation	Changes or Process Improvements	Benefits
C1	Excessive staff effort is allocated to assisting applicants at the intake stage due to inability for applicants to apply using online platform (BramPlanOnline)	Implement CofA processes in public-facing Accela platform (BramPlanOnline)	Implement CofA processes in public-facing Accela platform (BramPlanOnline) ²	<ul style="list-style-type: none"> • Increase in productivity as technical and professional staff are freed up to spend more time on higher-value tasks • Improvements to processing times as public-facing application interface can be used to enforce application quality requirements • Improvements to customer service as public-facing application interface can be used to provide applications with explanatory information
C2-A	Technical staff allocate time and effort on looking for unrelated non-compliances	Rationalize approach to identification of extraneous non-compliances	<ul style="list-style-type: none"> • Option 1: Implement internal policy to only look at the variance(s) sought by the applicant • Option 2: Implement two-track zoning review process³ <ul style="list-style-type: none"> ○ Track 1 (default): Only review variance(s) sought ○ Track 2: Fulsome zoning review intended to identify additional deficiencies prior to the file proceeding further; additional application fee would be paid for by applicant 	<ul style="list-style-type: none"> • Improvements to processing times as staff could spend less time on looking for extraneous non-compliances • Improvements to processing times as applications would not need to be amended after submission due to staff looking for and finding extraneous non-compliances • Improvements to revenue capture as applicants pay for additional services where greater staff effort is required
C2-B	<i>See above</i>	Provide training to CofA members regarding implementation of two-track system (to accompany Recommendation C2-A)	N/A	<ul style="list-style-type: none"> • Expectations of CofA members will be appropriately aligned with City procedures
C3	Application reference guides specific to the CofA are not available to applicants	Make CofA-specific application reference guides available to the public	<ul style="list-style-type: none"> • Prepare application guides targeted to the general public which explain how each of the various types of CofA processes play out and what is required for a successful application (including examples of properly-completed application forms and sketches) • Application guides should be available both on the public-facing general City website as well as on BramPlanOnline (once CofA processes are implemented in Accela) 	<ul style="list-style-type: none"> • Improvements to processing times as application quality will likely improve • Improvements to customer service as application process is clearer and better-understood
C4	CoA application form is viewed as complicated and not easily interpreted by applicants with no prior experience or those without professional representation	Simplify CofA application form	Revise CoA application form according to plain language principles with an emphasis on improving user friendliness	<ul style="list-style-type: none"> • Improvements to processing times as application quality will likely improve • Improvements to customer service as application process is clearer and better-understood

² The Project Team recognizes the substantial amount of work that will need to be undertaken to successfully implement CofA processes in the Accela platform. See **Section 5.3.1** of this report for further discussion.

³ Note that the Project Team has elected not to be prescriptive about the business logic that would result in an application proceeding through the Track 2 review process so as to leave the City with maximum flexibility to implement this recommendation according to the appropriate balance between customer service and revenue recovery. For example, the City could elect to treat the Track 2 review stream as optional and up to the applicant to elect to pursue, or specific triggers could be applied which automatically result in an application proceeding through Track 2 (e.g., complex applications), or some combination thereof.

Table 5-2: Process improvements relating to business processes

Item	Issue	Recommendation	Changes or Process Improvements	Benefits
B1	Applications are deemed complete without technical review	Implement “Preliminary Plan Review” process	Implement “Preliminary Plan Review” before an application is even made	<ul style="list-style-type: none"> Improvements to upfront processing times as application quality will likely increase
B2-A	Business processes cannot keep up with demand (e.g., fixed hearing schedule results in no ability to manage workload as application volume increases)	Modify approach to meeting statutory requirement for hearing applications within 30 days	Modify business processes to recognize that the 30 day “timer” for hearing an application does not need to start once an application is submitted (physically or digitally) ⁴	<ul style="list-style-type: none"> Improvements to staff morale as workload pressures are relieved
B2-B	<i>See above</i>	Make sketches available only upon request	Forego the need to include a sketch in order to distribute a public notice. Instead of including sketches in public notices, make them available to the public upon request (e.g., via BramPlanOnline). ⁵	<ul style="list-style-type: none"> Improvements to upfront processing times as staff do not need to wait for sketches to be made available to be able to distribute the public notice Improvements to upfront processing times as staff do not need to re-issue a public notice if a revised sketch is submitted (assuming there is no associated revision to the proposal at hand)
B2-C	<i>See above</i>	Implement a fixed cap on number of applications to be heard per CofA hearing cycle	Implement a fixed cap on number of applications to be heard per CofA hearing cycle (e.g., if an application is received after the cap is met, that application would be scheduled for the following hearing cycle) ⁶	<ul style="list-style-type: none"> Improvements to staff morale as workload pressures are relieved
B2-D	<i>See above</i>	Operate multiple Committees of Adjustment (if warranted)	Operate multiple Committees of Adjustment (if warranted) ⁷	<ul style="list-style-type: none"> Increase in processing throughput as more applications can be heard within the same timeframe
B2-E	<i>See above</i>	Employ a consent agenda approach for CofA hearings	Employ a consent agenda approach for CofA hearings, whereby the Committee can consider and render decisions on multiple files together as a batch (e.g., files where no objection is lodged by staff and the public)	<ul style="list-style-type: none"> Increase in productivity as technical and professional staff are freed up to spend more time on higher-value tasks Increase in processing throughput as decisions can be rendered for multiple files at once Improvements to customer service as more time can be allotted to more complex or controversial applications without increasing overall hearing length
B2-F	<i>See above</i>	Provide training to CofA members regarding consent agenda approach (to accompany Recommendation B2-E)	N/A	<ul style="list-style-type: none"> Expectations of CofA members will be appropriately aligned with City procedures

⁴ Subsection 45(4) of the *Planning Act* directs that “the hearing on any application shall be held within thirty days after the application is received by the secretary-treasurer.” The Project Team is of the opinion that receipt of an application need not necessarily be tied to the literal receipt of application materials, and can instead be construed to refer to a process by which the Secretary-Treasurer deems an application fit to be received, and therefore heard, by the Committee of Adjustment. This interpretation should allow the City to implement preliminary quality checks prior to the statutory requirement for holding a hearing within 30 days being triggered.

⁵ The regulation that governs the form that public notices must take explicitly provides for a public notice including either “a description of the subject land or a key map showing the subject land” – it does not require a sketch to be included in the notice (refer to clauses 3(11)(2) and 3(13)(3) in *O. Reg. 200/96*). It is noted that the recommended approach of making sketches available only upon request (i.e., not including sketches in public notices) is currently employed by the City of Ottawa.

⁶ Following the logic applied for Recommendation B2-A, if receipt of an application can be construed to refer to a process by which the Secretary-Treasurer deems an application fit to be received, then it is conceivable that the Secretary-Treasurer could apply a reasonable constraint such as the maximum number of applications that can be heard per hearing cycle as a factor in determining whether an application is fit to be received (and thus whether the statutory requirement for holding a hearing within 30 days is triggered). Refer to Footnote 4.

⁷ The Project Team recognizes that the operation of multiple committees would come with greater expenditure of logistical effort on the part of Clerk’s staff. Accordingly, it should be understood that this recommendation may only be appropriate if application volumes increase so substantially that the additional logistical effort becomes warranted. Accordingly, the City should pursue other process improvements first before considering this approach.

Item	Issue	Recommendation	Changes or Process Improvements	Benefits
B3	Staff spending time on low-value tasks (e.g., public notices and Notices of Decision are manually printed/labelled)	Employ streamlined approach to mailing processes	<ul style="list-style-type: none">• Modify layout of documents such that addresses can be printed automatically, without the need for affixing mailing labels onto envelopes (e.g. use envelopes with windows and set print layout accordingly)• Contract out printing/mailing services• Implement greater automation through capital investments in equipment	<ul style="list-style-type: none">• Increase in productivity as administrative staff are freed up to spend more time on higher-value tasks
B4	Staff spend substantial effort completing reports for every application, regardless of application complexity or resulting staff recommendation	Employ simplified reporting template for files where staff have no objections	For files where staff have no objections, make use of a brief, simplified reporting template which includes standardized text content (i.e., less than 1 page, and no need for analytical content)	<ul style="list-style-type: none">• Increase in productivity as technical and professional staff are freed up to spend more time on higher-value tasks• Improvements to processing times as staff are required to spend less time on reporting

Table 5-3: Process improvements relating to staffing and resources

Item	Issue	Recommendation	Changes or Process Improvements	Benefits
S1-A	Planning and Zoning staff each undertake separate site visits	Forego in-person site visits, or employ less labour-intensive approach to site visits	<ul style="list-style-type: none">• Forego in-person site visits through the use of date-stamped photographic records submitted by the applicant<ul style="list-style-type: none">○ City would need to define specific parameters for the quantity and nature of photos• If in-person site visits are to continue:<ul style="list-style-type: none">○ Only conduct site visits in exceptional circumstances (e.g., files deemed controversial by management, or files resulting from by-law complaints)○ Only send one staff member to conduct site visits (i.e., Planning and Zoning staff do not both need to attend the same site)⁸	<ul style="list-style-type: none">• Increase in productivity as technical and professional staff are freed up to spend more time on higher-value tasks• Improvements to corporate health and safety risk profile as fewer site visits implies fewer opportunities for exposure to health and safety risks
S1-B	See above	Provide training to CofA members regarding implementation of changes to site visit procedures (to accompany Recommendation S1-A)	N/A	<ul style="list-style-type: none">• Expectations of CofA members will be appropriately aligned with City procedures
S2	Notice signs must be picked up in-person, meaning Clerk's staff must be physically present at the front desk at all times	Employ streamlined approach to provision of notice signs	Make generic sign packages available at front desk for applicants to pick up themselves as needed, and require that application-specific notice paperwork be printed out and inserted into the sign package by applicants	<ul style="list-style-type: none">• Increase in productivity as front-line Clerk's staff no longer need to be physically present at the front desk at all times, and can instead focus on more important tasks• Improvements to customer service as customers do not need to wait to talk to staff to obtain sign packages, and can do so proactively (e.g., consultants with multiple applications can pick up multiple sign packages in one visit)
S3	Limited staffing resources allocated to CofA mean that there is minimal "slack" to respond to increases in application volumes (i.e., a single Development Planner is assigned to process CofA files on a full-time basis)	Streamline processes to reduce workload and/or add staff resources	<ul style="list-style-type: none">• Implement other recommendations and monitor resulting changes in workload, then make further staffing additions as appropriate• Assign an additional Development Planner 1 to the CofA to act as backup for workload peaks	<ul style="list-style-type: none">• Improvements to staff morale as workload pressures are relieved• Increase in processing throughput as more files can be processed in the same timeframe

⁸ Note that the Project Team has elected not to be prescriptive about who should attend site visits so as to leave the City with maximum flexibility to implement this recommendation as appropriate.

Table 5-4: Process improvements relating to use of technology

Item	Issue	Recommendation	Changes or Process Improvements	Benefits
T1	Accela is not used as an internal development approvals workflow tool	Implement CoA processes in existing Accela platform (BramPlanOnline)	Implement CoA processes in existing Accela platform (BramPlanOnline) ⁹	<ul style="list-style-type: none">• Increase in productivity as technical and professional staff are freed up to spend more time on higher-value tasks• Improvements to processing times as staff have timely access to most current files
T2	City has limited ability to track and report on CofA performance metrics	See above	See above	<ul style="list-style-type: none">• Improvements to managerial oversight as patterns and trends in performance can be identified, and issues addressed as needed• Improvements to customer service as typical, real-world processing timeframes can be reported
T3	Accela platform is not accessible by, or used by the City to manage interactions with, external agencies <ul style="list-style-type: none">• E.g., Accela not accessible by external agencies (i.e., interactions occur via email)• E.g., Accela not used to automatically inform external agencies of application decisions	See above	See above	<ul style="list-style-type: none">• Increase in productivity as technical and professional staff are freed up to spend more time on higher-value tasks• Improvements to processing times as external agencies have timely access to most current files

⁹ The Project Team recognizes the substantial amount of work that will need to be undertaken to successfully implement CofA processes in the Accela platform. See **Section 5.3.1** of this report for further discussion.

5.3.1 Additional Planning Needed for Improvements to Use of Technology

Multiple recommendations revolve around the need to implement CofA processes in the City's Accela development approvals management platform. While the recommendations may be brief in nature, their brevity should not be interpreted to imply that their implementation will be simple or easy to execute successfully.

Over the course of the future state stakeholder engagement activities, City staff repeatedly voiced the view that substantial improvements need to be made to the existing implementation of planning approvals processes in the Accela platform before additional approvals processes (i.e., CofA) are integrated into the system. It is understood that similar sentiments and recommendations will have been reflected in the City's broader review of its development approvals processes (undertaken concurrently with the Committee of Adjustment End-to-End Process Review project).

Accordingly, the recommendations pertaining to implementation of CofA processes in the Accela platform should be considered and planned for in a way that recognizes the substantial work that needs to be undertaken to improve the Accela platform in general.

5.4 Amendments to Regulatory Frameworks

As noted in earlier reporting prepared by the Project Team, modifying land use policy and regulatory frameworks can offer meaningful opportunities to streamline the delivery of development approvals processes.¹⁰ This is especially true when such modifications are coupled with related changes to business processes.

The Project Team identified several opportunities for targeted amendments to the City's zoning framework intended to optimize the overall execution of CofA services. The following subsections detail recommended zoning amendments with specific regard to two main drivers behind demand for CofA services in Brampton: below grade entrances and driveway widenings.

5.4.1 Below Grade Entrances

The data analysis undertaken by the Project Team as described in **Section 3.1.4** of this report led to the following observations in relation to why minor variance applications involving below grade entrances are so common:

- Most applications pertained to dwellings on corner lots, which follows from the existing prohibition against below grade entrances located between the main wall of a dwelling and the flankage lot line (i.e., the exterior side yard) given in subsection 10.23.1 of the zoning by-law; and

¹⁰ Refer to the *Drivers of Submission Assessment and Solutions Report (Technical Brief)*, dated August 2022.

- Similarly, a substantial portion of applications pertained to semi-detached dwellings, which follows from the existing prohibition against semi-detached dwellings having below grade entrances located within a required side yard, front yard, or between the main wall of a dwelling and the flankage lot line given in subsection 10.23.1 of the zoning by-law.

The current provisions for below grade entrances given in section 10.23 of the zoning by-law are inherently restrictive, and effectively only permit below grade entrances in the following cases:

- If located within the rear yard of a single detached, semi-detached, or townhouse dwelling; or
- If located within a required interior side yard of a single detached dwelling subject to the side yard on the opposite side of the dwelling having a continuous width of at least 1.2m, and if a minimum setback of 0.3m is maintained from the below grade stairway to the adjacent lot line.

The approach taken in the zoning by-law could be viewed as a relatively restrictive implementation of the overarching policies pertaining to second units given in subsection 3.2.8.2 of the current Brampton Official Plan. Salient policy provisions from the Official Plan offer the following direction regarding below grade entrances:

- That alterations to the exterior of a principal dwelling undertaken to facilitate a second unit must be consistent with its existing design, style and materials (para 3.2.8.2(a)(iii)); and
- That second units shall have no negative impact on stormwater management and site drainage (para 3.2.8.2(a)(v)).

With these observations in mind, the Project Team settled on two recommendations for reducing demand for CofA services associated with below grade entrance regulations while also respecting the intent of the Official Plan and zoning by-law and being reflective of sound planning principles. The recommendations are described in the following subsections.

5.4.1.1 Recommendation P1: Allow Below Grade Entrances in Exterior Side Yards As-of-Right

The City should consider amending subsection 10.23.1 of the zoning by-law to remove the phrase “or in a yard located between the main wall of a dwelling and a front of [sic] flankage lot line.”¹¹

This would have the effect of allowing below grade entrances within the exterior side yard of a corner lot for any dwelling for which below grade entrances would otherwise be permitted. In such cases, proponents would still need to meet all other applicable zoning regulations that might be implicated by the development of a below grade entrance (e.g., side yard setbacks, landscaping requirements, requirements for clear paths of travel for access to second units, etc.). Furthermore, the consulting team has experience with newer dwellings on corner lots that have their principal entrance located facing the

¹¹ Given that a flankage lot line is defined as “the longer lot line which abuts a street on a corner lot,” and the front lot line on a corner lot is defined as “the shorter lot line that abuts a street,” the wording “front of flankage lot line” appears to be a misnomer. We have interpreted the corresponding text in section 10.23.1 of the zoning by-law as if it were referring to “a flankage lot line”.

flankage lot line, implying that the existence of a below grade entrance can still meet principles of good urban design.

Based on the findings from the sample set of data described in **Section 3.1.4** of this report, this amendment would have reduced the total count of variances by 13 and the total count of applications by 2.

5.4.1.2 Recommendation P2: Generally Allow Below Grade Entrances in Rear Yard or Side Yard As-of-Right

The City should consider making the following amendments to the zoning by-law:

1. Deleting the existing text in subsection 10.23.1 of the zoning by-law and replacing it with the following: "For a single detached, semi-detached, or townhouse dwelling, or two unit dwelling, exterior stairways constructed below the established grade may be permitted within a rear yard or side yard."; and
2. Deleting the existing text in subsection 10.23.2 of the zoning by-law in its entirety.

This would have the effect of generally permitting below grade entrances in any rear yard or side yard (thus also incorporating the intended effect of Recommendation P1), while also broadening the permissions to apply to all of the noted dwelling types. Just as with Recommendation P1, proponents would still need to meet all other applicable zoning regulations that might be implicated by the development of a below grade entrance (e.g., setbacks, landscaping requirements, requirements for clear paths of travel for access to second units, etc.).

While this approach would substantially reduce the number of variances relating to relief from the provisions specific to below grade entrances, further analysis should be undertaken to determine the degree to which relief may still need to be sought from other regulations.

5.4.2 Driveway Widenings

City staff noted during the current state working sessions their view that, in addition to below grade entrances, variances involving widening of driveways constituted "low hanging fruit" that could offer opportunities for reductions in demand for CofA services.

The data analysis undertaken by the Project Team as described in **Section 3.1.4** of this report led to the following observations in relation to minor variance applications involving driveway provisions:

- Most applications pertained to relief from the driveway width requirement in the zoning by-law;
- Most applications sought relief from maximum driveway widths of 6.71m or 5.2m (the applicable maximum value being dependent on the dimensions of the lot in question);
- Applications involving driveways exceeding the permitted maximum of 6.71m sought an average exceedance of 0.87m (or 13.0% beyond the permitted maximum);

- Applications involving driveways exceeding the permitted maximum width of 5.2m sought an average exceedance of 0.23m (or 4.5% beyond the permitted maximum); and
- Many applications involved existing conditions (i.e., applicants who had already had their driveway widened, and were seeking relief retroactively).

With these observations in mind, the Project Team settled on two recommendations for reducing demand for CofA services associated with driveway width regulations while also respecting the intent of the zoning by-law and being reflective of sound planning principles. The recommendations are described in the following subsections.

5.4.2.1 Recommendation P3: Apply 5% Increase to Maximum Driveway Widths As-of-Right

The City should consider making the following amendments to the zoning by-law:

1. Amend paragraph 10.9.1(B)(1)(b) of the zoning by-law as it applies to lots having a width equal to and greater than 8.23m but less than 9.14m to increase the maximum permitted driveway width value by 5% (i.e., from 5.2m to 5.46m); and
2. Amend paragraph 10.9.1(B)(1)(c) of the zoning by-law as it applies to lots having a width equal to and greater than 9.14m but less than 15.24m to increase the maximum permitted driveway width value by 5% (i.e., from 6.71m to 7.05m).

These amendments constitute a relatively minor modification and offer a reasonable balance between efforts to seek greater efficiency in the delivery of CofA services while still maintaining the intent of the zoning by-law. For the types of cases where these amendments would apply, proponents would still need to meet all other applicable zoning regulations that might be implicated by the widening of a driveway (e.g., setbacks, landscaping requirements, etc.).

Based on the findings from the sample set of data described in **Section 3.1.4** of this report, these amendments would have reduced the total count of variances by 5.

5.4.2.2 Recommendation P4: Implement Other Process Changes and Monitor Outcomes

As part of this end-to-end review, the City may alter the approach to its processing of variance applications. By modifying its approach, these process changes could reduce the volume of variances brought to the CofA. If the City relies on process changes alone, this represents a ‘do nothing’ approach in terms of policy/zoning changes.

For example, implementation of Recommendation C2-A could have a noticeable impact in terms of reducing the volume of variances relating to maximum driveway widths. This would involve implementing a two-track system of review for CofA files, whereby one track involves City staff only reviewing the variance(s) sought by the applicant, and a second track involves the applicant paying an additional fee to have the City undertake a broader review of the proposed development for zoning compliance. If an applicant elects not to pay for a broader zoning review and proceeds through the first

track with a variance unrelated to driveway regulations, the compliance risk associated with any existing or resulting deficiency relating to driveway widths would remain solely with the applicant. More importantly, the City would not be expending staff resources on identifying such deficiencies and the counts of such variances would likely be reduced.

The City should monitor the rate of variances relating to driveway widths before and after one or more process or regulatory changes have been implemented so as to determine whether further adjustments are needed.

5.5 Deferrals

Aside from policy-based drivers, the City should be able to capture additional opportunities to reduce the number of applications needing to be considered by the CofA if the frequency of deferral decisions is minimized. In light of the detailed analysis regarding the rate and nature of deferral decisions is given in **Section 3.1.5** of this report, the following subsection offers the Project Team's recommendation with regard to what can be done to reduce the rate of deferrals.

5.5.1 Recommendation O1: Implement Other Process Changes and Monitor Outcomes

It is believed that the rate of deferrals may be substantially reduced through the application of other process-related recommendations which are intended to avoid the circumstances that trigger the need for deferrals in the first place (e.g., the need to amend an application after submission). Accordingly, the City should monitor the rate of deferrals before and after one or more process changes have been implemented.

5.5.2 Commentary on Provision of Notices for Deferrals

The City requested that the Project Team offer further clarity on best practices regarding the provision of notices in cases where a CofA file is deferred to a future hearing. It is understood that the City's current practice is to issue subsequent notices in instances where a file is deferred to a future hearing without a specific hearing date having been selected at the time of deferral. Conversely, the Project Team understands that the City does not issue subsequent notices in instances where a file is deferred to a future hearing date and the future hearing date is set out at the time of deferral.

The requirements for the provision of public notices insofar as consent applications are concerned are given in section 3 of *O.Reg. 197/96*. The notice provisions applicable to applications for consent only require notice to be given in relation to the application itself – not the hearing of that application. Accordingly, there would appear to be no need to issue subsequent notices in instances where a consent file is deferred from one hearing to a future hearing.

The requirements for the provision of public notices insofar as minor variances are concerned are given in section 3 of *O.Reg. 200/96*. The regulation stipulates different requirements for the provision of

notices depending on whether the intent is to notify the general public, specific interested parties, or specific approval authorities or corporate entities (such as utilities). The analysis given below relates to the provision of notices intended for the general public.

The Project Team noted anecdotally that the City's current practice regarding the provision of notices in instances of deferrals for minor variance applications appears consistent with the practice employed in other municipalities, such as the City of Ottawa. This practice appears to be operable on the basis of whether or not a future hearing date for an application to be deferred is set during the course of the prior hearing or after the fact. The logic is further explained as follows:¹²

1. If an application for minor variance is heard at a hearing, and that application is deferred to a future hearing with the future hearing date having been set in the course of that hearing, then there is no need to re-issue a subsequent public notice. This appears to be a reasonable practice as the information regarding the new hearing date is already readily available to the public by way of their participation in the first hearing or through the record of that hearing made public after the fact.
2. However, if an application for minor variance is heard at a hearing, and that application is deferred to a future hearing without a specific hearing date having been set in the course of that hearing, then the typical notice provisions (i.e., the need to issue a notice) would apply once the new hearing date is subsequently set. This approach would satisfy the intention of the statutory requirements for enabling public participation in the future hearing.

In all cases, it is assumed that the City would provide notice to interested third parties who make requests of the City to do so, and to the various agencies, authorities and entities as prescribed in the regulation.

5.6 Measuring the Financial Benefits

The financial benefits that stand to be realized through the comprehensive implementation of the recommendations included in this report can be summarized according to the following general outcomes:

1. Efficiency gains resulting from improved allocation of staffing resources, process re-engineering and technology platform productivity enhancements. Finite staff resources are deployed so as to have the right people doing the right things.
2. Improved "growth pays for growth" cost recovery of staff processing effort, particularly for minor variance applications. By modernizing its approach to CofA application fees, the City can strike a more appropriate balance between the desire for provision of equitable access to CofA services and the need for a sustainable cost recovery model.

¹² The analytical commentary provided in this report does not constitute legal advice and should be reviewed by the City's legal counsel.

Using data provided by the City, the project team estimated the potential savings in time and labour costs that could be expected with implementation of each process-oriented recommendation. The following inputs and assumptions were used to develop the resulting estimates:

- Estimates of the average time spent by staff on consent files (42.41 hours) and minor variance files (45.16 hours), respectively;
- An estimate of the average total labour cost of all CofA applications (\$4,776.00);
- An assumed average hourly labour rate (\$108.55 per hour), derived from the aforementioned inputs; and
- Counts of the volume of consent and minor variance applications processed in 2021, which were used to calculate representative values for the total annual cost savings that could have been captured over the course of that year.

The resulting estimates of potential gross cost savings, summarized for each recommendation category, are given in **Table 5-5**; associated estimates of the hourly labour savings are given in **Table 5-6**.¹³ If all recommendations were implemented, it is estimated that the City could expect potential savings in labour effort of up to \$1,380 per consent file and up to \$1,570 per minor variance file. If the volume of applications processed in 2021 is used as a reference for annual savings, the high level estimate indicates that the City could stand to save nearly \$550,000 per year through the implementation of all recommendations. Compared to an assumed total labour cost of \$1,695,480 for all CofA applications processed in 2021, implementation of all recommendations would represent a 32% reduction in labour costs.¹⁴

Table 5-5: High level estimate of potential cost savings¹⁵

Recommendation Category	Estimated cost savings per application, consents	Estimated cost savings per application, minor variances	Estimated cost savings per year, consents	Estimated cost savings per year, minor variances	Total estimated cost savings per year
Customer Service	\$55	\$165	\$2,255	\$51,810	\$54,065
Business Processes	\$340	\$340	\$13,940	\$106,760	\$120,700
Staffing/Resources	\$195	\$195	\$7,995	\$61,230	\$69,225
Use of Technology	\$790	\$870	\$32,390	\$273,180	\$305,570
Total	\$1,380	\$1,570	\$56,580	\$492,980	\$549,560

¹³ The values reported refer to gross savings not including costs that may be associated with implementation (e.g., budget or labour effort needed for implementation of Accela).

¹⁴ The total labour cost for 2021 was derived using the City's estimated average total labour cost per CofA application (\$4,776) and the total volume of CofA applications processed in 2021.

¹⁵ Values calculated on a per-application basis were rounded up to the nearest \$5 in the interests of legibility; these rounded values were used to calculate the annual values.

Table 5-6: High level estimate of potential labour savings¹⁶

Recommendation Category	Estimated hourly labour savings per application, consents	Estimated hourly labour savings per application, minor variances	Estimated hourly labour savings per year, consents	Estimated hourly labour savings per year, minor variances	Total estimated hourly labour savings per year
Customer Service	1	2	20	471	±494 hours
Business Processes	3	3	125	958	±1,089 hours
Staffing/Resources	2	2	72	550	±626 hours
Use of Technology	7	8	297	2,509	±2,821 hours
Total (approximate)	±13 hours	±15 hours	±514 hours	±4,488 hours	±5,030 hours

The estimates of potential gross cost savings can also be summarized by savings associated with specific business units. If all recommendations were implemented, it is estimated that gross savings at a departmental level would apply as follows:

- **Clerk's Office:** up to \$775 per consent file and \$775 per minor variance file, netting total annualized savings of up to \$275,125;
- **Planning and Development Services:** up to \$565 per consent file and \$755 per minor variance file, netting total annualized savings of up to \$260,235; and
- **All other departments:** up to \$30 per consent file and \$30 per minor variance file, netting total annualized savings of up to \$10,650.¹⁷

As many of the recommendations are tied to tasks or processes followed for every application, it is expected that total annual savings would increase or decrease in relation to annual application volumes.

¹⁶ The caveats and qualifiers applicable to Table 5-5 also apply to these values.

¹⁷ The caveats and qualifiers mentioned in Footnotes 13, 14 and 15 also apply to the department-level values.

6.0 Implementation, Monitoring and Evaluation

6.1 Implementation Roadmap

The City needs to champion implementation through leadership, assigning resources, and setting achievable timeframes for implementing the recommendations. It is expected that Development Services will lead implementation in close coordination with the City Clerk. If significant resources are needed, implementation will follow after approval of funding.

The implementation roadmap given in **Table 6-1** identifies realistic timeframes for implementation of the various recommendations according to the following categories:

- **Do now**, which refers to activities that can and should be undertaken immediately;
- **Do soon**, which refers to activities that may have longer lead times due to associated pre-work or other dependencies, but which should still be undertaken sooner than later (i.e., within approximately 1 to 2 years;
- **Do later**, which refers to activities that will require lengthier implementation periods or which should follow others due to pre-work or other dependencies; such activities should be fully executed within approximately 2 to 5 years.

The proposed implementation timeframes have been based on the relative priority and assumed level of effort needed to successfully implement each recommendation.

Table 6-1: Implementation roadmap¹⁸

Item	Recommendation	2023 Q1-Q2	2023 Q3-Q4	2024 Q1-Q2	2024 Q3-Q4	2025 Q1-Q2	2025 Q3-Q4	2026 Q1-Q2	2026 Q3-Q4	2027 Q1-Q2	2027 Q3-Q4
C1/T1/T2/T3	Implement CofA processes in public-facing Accela platform (BramPlanOnline)										
C2-A	Rationalize approach to identification of extraneous non-compliances										
C2-B	Provide training to CofA members regarding implementation of two-track system										
C3	Make CofA-specific application reference guides available to the public										
C4	Simplify CofA application form										
B1	Implement “Preliminary Plan Review” process										
B2-A	Modify approach to meeting statutory requirement for hearing applications within 30 days										
B2-B	Make sketches available only upon request										
B2-C	Implement a fixed cap on number of applications to be heard per CofA hearing cycle										
B2-D	Operate multiple Committees of Adjustment (if warranted)										
B2-E	Employ a consent agenda approach for CofA hearings										
B2-F	Provide training to CofA members regarding consent agenda approach										
B3	Employ streamlined approach to mailing processes										
B4	Employ simplified reporting template for files where staff have no objections										
S1-A	Forego in-person site visits, or employ less labour-intensive approach to site visits										
S1-B	Provide training to CofA members regarding implementation of changes to site visit procedures										
S2	Employ streamlined approach to provision of notice signs										
S3	Streamline processes to reduce workload and/or add staff resources										
P1	Allow Below Grade Entrances in Exterior Side Yards As-of-Right										
P2	Generally Allow Below Grade Entrances in Rear Yard or Side Yard As-of-Right										
P3	Apply 5% Increase to Maximum Driveway Widths As-of-Right										
P4/O1	Implement Other Process Changes and Monitor Outcomes										

¹⁸ Refer to Sections 5.3, 5.4 and 5.5 of this report for detailed descriptions of each recommendation.

6.2 Ongoing Monitoring and Evaluation

The successful implementation of any plan necessitates meaningful monitoring and evaluation along the way so as to ensure that things get done, or to modify the plan if needed. As it proceeds through implementation, the City should prepare end-of-year internal progress reporting on an annual basis. The progress reports should function as a brief summary of what has been achieved in the preceding year, the activities that are actively underway, and the roadmap for remaining implementation activities yet to be undertaken.

Appendix A

Current State Process Maps

```
graph LR; Clerk's Office --> Applicant; Applicant --> Planning / Zoning Staff; Planning / Zoning Staff --> CoA;
```

Clerk's
Office

Applicant

Planning /
Zoning Staff

CoA

Minor Variances (Intake + Pre-Hearing Phases)

Intake Phase

Application materials submitted (by cut-off deadline)

Application oath commissioned by staff (typically)

Clerk's Office reviews for Application completeness (piece check against a list derived from Regs)

Application Deemed Complete (not considering content adequacy)

Application materials assigned to upcoming hearing date

Application data uploaded into Accela + hard copy scanned

Application materials circulated (internally to City business units + external agencies: Region, CAs)

Pre-Hearing Phase

CofA Planner + assigned Zoning Examiner separately review adequacy/content of submission materials

Planner and/or Zoning Examiner do not identify significant shortcomings in application submission materials

Planner and/or Zoning Examiner identify significant shortcomings in application materials

Planner and/or Zoning Examiner request refinements/resubmission of application materials

Staff work back-and-forth with applicant to secure adequate application content

Site visit undertaken by Planner*

Site visit undertaken by Zoning Examiner*

Additional variances often identified at site visits

Cross-Functional Team Meeting (both adequate files and incomplete / inadequate files)

Continued back-and-forth with Applicant to secure required information / content

Deferral from Sheet 3

Public notice materials finalized

Planner prepares staff report with recommendation (deferral or approval)

Site visit often undertaken by CoA members

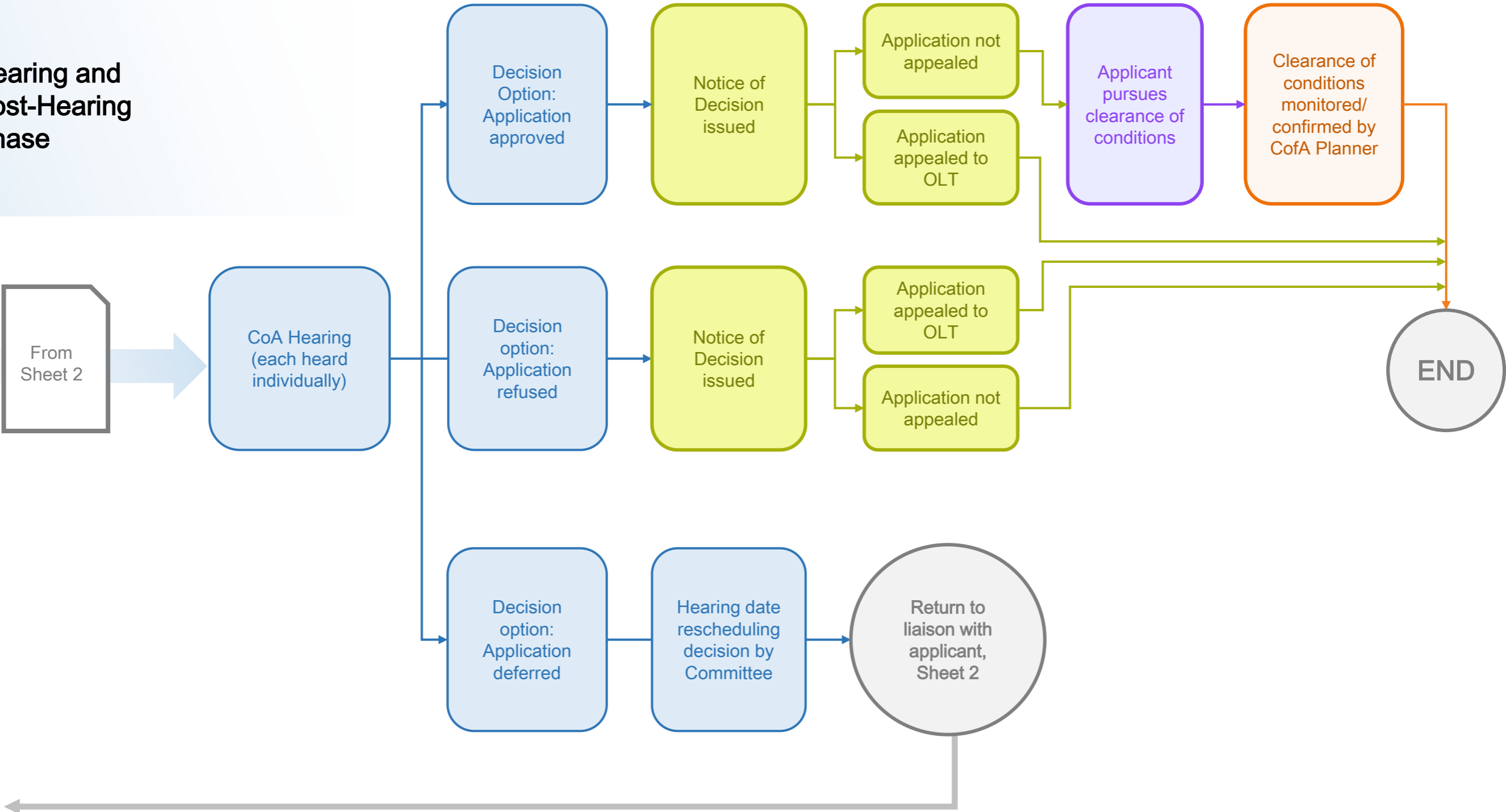
Finalize hearing agenda

GO TO SHEET 3

*Site visits commonly involve taking measurements on site

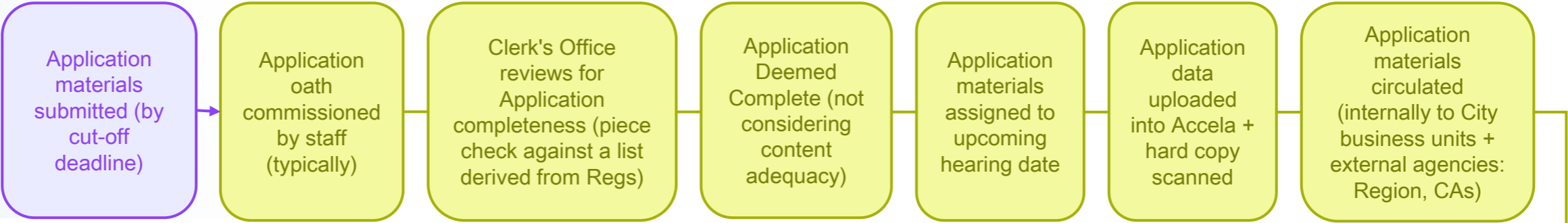
Minor Variances (Hearing and Post-Hearing Phase)

Hearing and Post-Hearing Phase

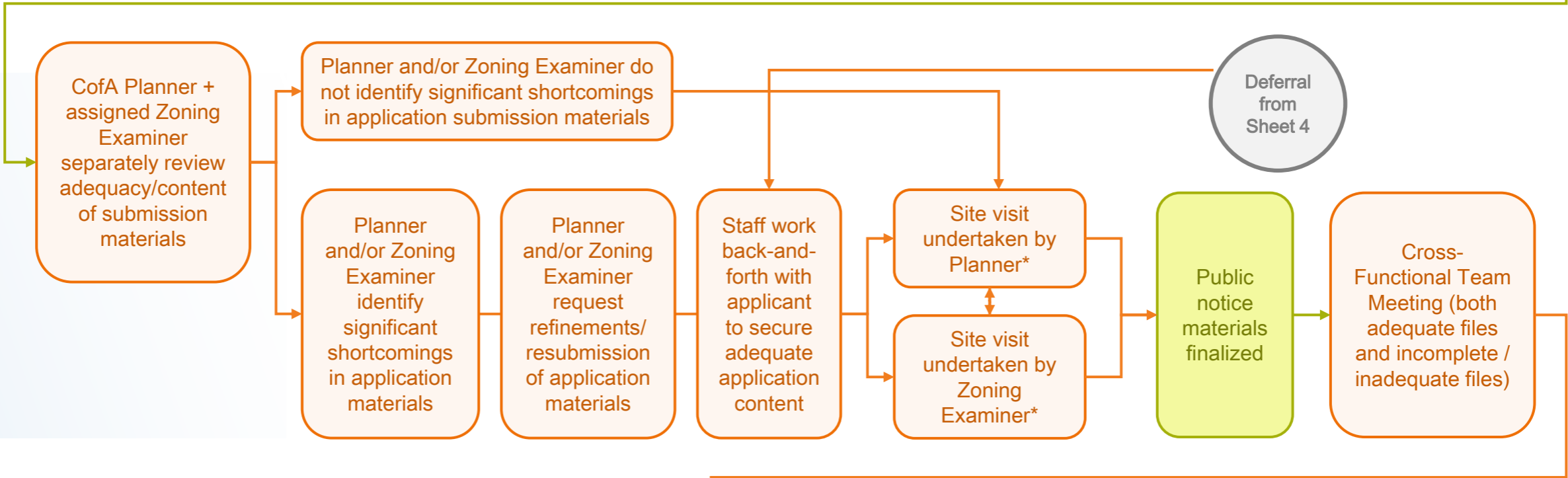


Consents (Intake and Pre-Hearing Phases)

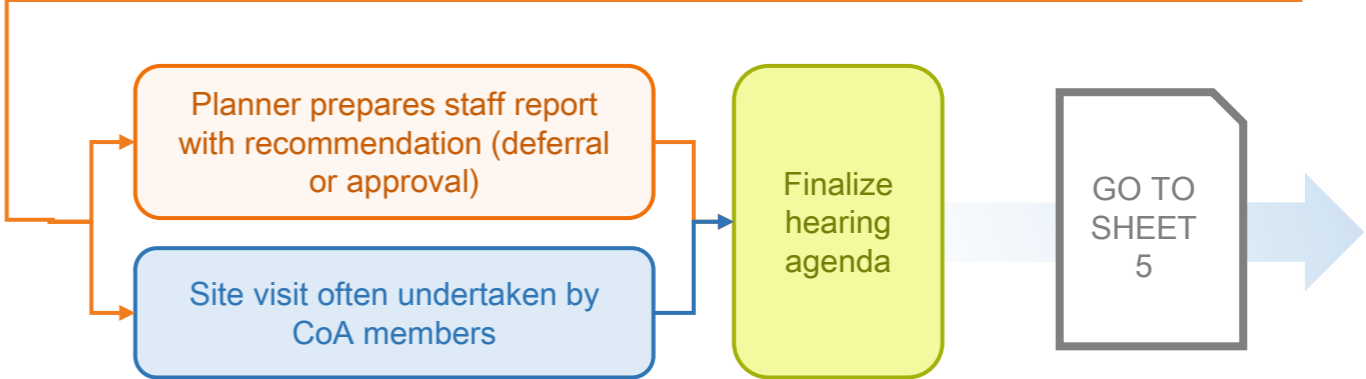
Intake Phase



Pre-Hearing Phase



*Site visits commonly involve taking measurements on site



Consents (Hearing and Post-Hearing Phase)

Hearing and Post-Hearing Phase

From Sheet 4

CoA Hearing

Decision Option:
Application approved

Notice of Decision issued

Application not appealed

Application appealed to OLT

Applicant pursues clearance of conditions

Clearance of conditions monitored/ confirmed by CofA Planner

Decision option:
Application refused

Notice of Decision issued

Application appealed to OLT

Application not appealed

Decision option:
Application deferred

Hearing date rescheduling decision by Committee

Return to liaison with applicant, Sheet 4

END