

October 14, 2020

Mr. Andrew Whittemore
Commissioner of Planning and Building
The City of Mississauga
Civic Centre, 300 City Centre Drive
Mississauga, ON
L5B 3C1

Dear Mr. Andrew Whittemore,

RE: Further Discussion on the BILD & Altus Group Municipal Benchmarking Study

We would like to thank you and your staff for meeting with us on Tuesday October 6th to discuss the findings of our recently released BILD and Altus Group Municipal Benchmarking Study. The study was prepared by Altus Group and was designed to answer the fundamental question “What are the impacts of municipal processes and approval times on housing supply and affordability in the GTA.”

Through this discussion, we were advised of missing data underpinning the Mississauga findings of this study, and discuss some specific areas where corrections were needed. To address this concern, we directed Altus Group to complete an addendum letter to this study which is included herein. We trust this letter alleviates the concerns raised in the meeting.

We thank the City of Mississauga for bringing this matter to our attention and we also want to take the opportunity to thank the City for often being a municipality that we look to for best management practices. The City’s initiative prior to the emergence of COVID-19 in introducing ePlans for all building permits and online site plan application tasks is a perfect example of being service-ready.

We greatly appreciate how swiftly the City was able to adapt its development services throughout this pandemic. We look forward to our continued, open dialogue with the City. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Jennifer Jaruczek
Planner, Policy & Advocacy, BILD

October 9, 2020

Memorandum to: Andrew Whittemore
City of Mississauga

From: Daryl Keleher, Senior Director
Altus Group Economic Consulting

Subject: BILD Municipal Benchmarking Study – Explanatory Note Regarding City of Mississauga Results and Accounting for New City Initiatives

Altus Group Economic Consulting was retained by BILD to prepare a Municipal Benchmarking Study (the “Benchmarking Study”), which seeks to review how municipal processes, fees and charges are contributing to housing affordability issues in the Greater Toronto Area (the “GTA”). The Benchmarking Study includes a review of 18 different municipalities across the GTA, including the City of Mississauga.

The Benchmarking study includes numerous analyses which are ultimately combined into an overall ranking that allows for municipal performance in the studied areas to be compared.

Further to our discussions with City staff, we have a few comments to help contextualize and explain some of the results in the Benchmarking Study and a few instances of things that may have emerged since our research was undertaken, or may have been missed in our research process that are worth noting.

Municipal Planning / Building Employees per 1,000 Housing Starts

The Benchmarking Study included an analysis of municipal planning and building department employees to understand the capacity that municipalities may have to review development applications.

To standardize the findings, the number of employees was compared to the number of housing starts in the municipality, with the result being a planning/building employees per 1,000 housing starts. It was found that the City of Mississauga has 97 planning/building employees per 1,000 housing starts. The average in the GTA municipalities studied was 75 planning/building employees per 1,000 housing starts. This analysis is based on data from the City’s annual budget and CMHC data on housing starts from the past five years (2015-2019).

The Ratio Presented in the Report for the City of Mississauga may be Overstated Due to Housing Start Data

In the last two years, the City has averaged approximately 3,000 housing starts, however our methodology utilized the 5-year average number of housing starts, which due to a 2016 that had housing starts in the City totalling only 929 dwelling units means the 5-year average in Mississauga was only 2,276 dwelling units. The impact of this outlier year means that the ‘denominator’ in our analysis may be lower than a typical year, which would increase the number of employees per 1,000 housing starts.

The Ratio Presented in the Report Doesn't Acknowledge Significant Amounts of Staffing Required for Non-Residential Development Application Review

The count of planning/building employees included in the calculation of the ratio includes a significant number of staff required for review of non-residential development applications. The ratio presented in the report does not attempt to estimate what proportion of employees would be required for reviewing these types of development applications.

This means that municipalities with large proportions of non-residential development applications, such as Mississauga, may have a ratio reported in the Benchmarking Study that is somewhat overstated.

While we were unable to control for the degree to which staff are required for non-residential development application review, it is a real factor that should be considered when reviewing and interpreting the data presented in the Benchmarking Study.

Inclusion of Planning Policy Staff

Further to the discussion with City staff, we were made aware of inclusion of some staffing (35 staff) in the Planning Strategies division that may not meet our criteria for staff primarily oriented towards development and building application review. These FTE should have been excluded from our analysis and will be excluded in subsequent versions of the study.

If we were to remove the FTE from the Planning Strategies division, the City's staffing ratio to housing starts falls 97 per 1,000 housing starts to 81 per 1,000 housing starts, which is just above GTA-wide averages.

Planning Tools & Features

The analysis presented on the number of planning features present in each municipality was based on a desktop survey and subjective ranking of how close each feature was to being fulfilled. In our research, which was conducted in November and December 2019, we scored the City at 4.5 out of 8.0 (56.5%), with the City being deducted full or partial points in the following areas:

- Terms of reference for studies supporting development applications,
- Inclusion of historic applications in the development application status tracker presence of downloadable GIS files,
- Presence of a dedicated GIS portal and downloadable GIS files with City zoning information, and
- Availability of studies or files supporting historic and active development applications on the municipal website.

Based on discussions with City staff and a review of materials and information, some of which has been released since the time of our research, we are now aware of tools and features the City now makes available that we may have missed in our research or have been made available since our research was undertaken. Based on further review:

- The terms of reference for studies provided on the City's website is improved, and as one example, the studies required for site plan are clearly set out, with terms of reference provided for each individual study. However, there is still some information lacking regarding the study requirements

and terms of reference for those studies required for OPAs, Zoning by-law amendments, plans of subdivision and plans of condominium. However, it is understood that some of the information requirements not found on the website may be made clear during the pre-application meeting process.

- The City's new GIS portal shows development applications approved in the past 18 months. While this standard is much shorter than other municipalities who provide a fuller range of historic approvals and applications, we feel that the data now provided by the City is sufficient to merit a full point in this area, particularly if the historic data will be retained going forward (rather than just including a rolling 18-months of historic data).
- The City has since greatly improved its GIS portal with zoning information available, which was launched in September 2020. In our opinion, the City's GIS portal is now one of the better examples of a GIS/mapping portal among the municipalities studied. Therefore, our assessment is that the City would now be assigned a full point for this feature if the study were done again today.
- The City does make available studies and files supporting development applications but appear to only make this available to the applicants themselves for their specific applications with a not fully available to all interested parties as other municipalities do. Therefore, our original score of a half-point is deemed to stand.

Therefore, in our assessment, had the research been completed today, the City would score higher, with a score of 6.5 out of 8.0 (81.3%) instead of the 4.5 out of 8.0 (56.5%) based on our research done in late-2019. This would place the City in the top-third of the municipalities studied in the Benchmarking Study for this element of the overall ranking.

Approval Timelines

The Benchmarking Study includes an analysis of municipal approvals timelines based on data extracted from City staff reports and other available sources. The average timelines for approvals in the City was estimated to be 18 months, which is roughly similar to the GTA-wide average.

However, it is noted that in the case of Mississauga, with most of the development in the City being infill in nature and generating potential impacts on the surrounding community, or located on brownfields with potential environmental issues to consider, or on extraordinarily large development sites (Port Credit West Village, Ninth Line, Lakeview¹), the complexity of applications being dealt with by City staff is very high. Therefore, the comparison of average approvals timelines should be viewed through this lens, which cannot be controlled for, but is worth acknowledging.

¹ These three development areas were not included in our database as the individual development applications for new housing units are/were still active, however the likely eventual approval of development on these sites may mean that the approval timelines for these sites will affect the findings in subsequent versions of the study.