

**Section III – Items for the Information of the Board**

**TO:** Chair and Members of the Board of Directors  
Friday, March 21, 2025 Meeting

**FROM:** Sameer Dhalla, Director, Development and Engineering Services

**RE: SERVICE DELIVERY REPORT FOR SECTION 28 PERMIT APPLICATIONS, 2024**

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**KEY ISSUE**

The purpose of this report is to present Toronto and Region Conservation Authority's (TRCA) Section 28 permit application review service delivery outcomes for 2024 pursuant to the Conservation Ontario Client Service and Streamlining Initiative.

**RECOMMENDATION:**

**IT IS RECOMMENDED THAT the Service Delivery Report for Section 28 Permit Applications, 2024 be received for information.**

**BACKGROUND**

On March 29, 2019, the Board of Directors adopted [RES.#A38/19](#) which states in part:

“...THAT the Board of Directors endorse the three key areas identified by the Conservation Ontario working group for all Conservation Authorities to: 1) improve client service and accountability; 2) increase speed of approvals; and 3) reduce the notion of “red tape” and regulatory burden, in addition to the ongoing streamlining measures being undertaken by TRCA...;

AND THAT staff be directed to work with Conservation Ontario, municipalities, and stakeholders, including but not limited to the Building Industry and Land Development Association (BILD), to identify additional improvements and report back to the Board of Directors on the outcome of this work.”

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Guidance related to service delivery standards for Section 28 permit applications was historically specified in the Ministry of Natural Resources and Forestry (MNR) Policies and Procedures for Conservation Authority Plan Review and Permitting Activities (2010).

As part of a renewed commitment to efficient regulatory services, Conservation Ontario (CO) Council endorsed new Client Service Standards for Conservation Authority Plan and Permit Review in June 2019. This guidance established a more ambitious set of service standards that Conservation Authorities should meet as best practice. Under this framework, Conservation Authorities should render a decision on complete applications within 63 days for “major” applications, 42 days for “minor” applications and within 14 days for a new category of “routine” applications. Staff have been reporting under this framework since 2020. Staff has consistently met these targets between 84 – 90% of the time, with continuous improvements from 2020 to 2023.

In 2024, the Province implemented amendments to the Conservation Authorities Act (the Act) and replaced TRCA’s previous regulation with O. Reg. 41/24. These Act amendments and the new regulation require conservation authorities to prepare an annual report outlining statistics on permits and the level of compliance with the requirements of Ontario Regulation 41/24 (Prohibited Activities, Exemptions and Permits). Conservation Ontario Council endorsed the new Annual Reporting Guidance and Template: Permit Timelines and Regulatory Compliance on September 23, 2024. This guide established a revised set of service standards that Conservation Authorities should meet as best practice. Under this framework, Conservation Authorities should render a decision on complete applications within 90 days for “major” applications and 30 days for “minor” applications. Applications received and issued by TRCA between April 1, 2024, and December 31, 2024, under this new framework are reported in the table below.

### **RATIONALE**

Consistent with Pillar 4, Service Excellence, of TRCA’s Strategic Plan, the Development Planning and Permits and Infrastructure Planning and Permits business units have committed to the objective of delivering at least 80% of all permit issuances within the Conservation Ontario Guideline timeframes. The following table presents the service delivery results for all

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Section 28 permits between April 1, 2024, and December 31, 2024, within TRCA's jurisdiction.

Annual Reporting – Permit Statistics	
<b>Total Permits Issued (Overall)</b> (January 1 <sup>1</sup> – December 31):	<b>634</b>
<b>Total Major Permits Issued</b> (January 1 <sup>1</sup> – December 31):	<b>227</b>
<b>Total Minor Permits Issued</b> (January 1 <sup>1</sup> – December 31):	<b>407</b>
<b>Total Applications Subject to Minister's Order (Minister's Review):</b>	<b>0</b>
Annual Reporting – Permit Timelines	
<b>COMPLETE APPLICATION REVIEW</b> Total complete application reviews completed in 21 days:	<b>582 (92%)</b> Reason for reviews over 21 days: - Staff Turnover and adjustments to new regulatory requirements
<b>PERMIT TIMELINES (MAJOR)</b> Total Major Permits Issued <u>Within</u> Decision Timeline (90 Days):	<b>223 (98%)</b>
<b>PERMIT TIMELINES (MAJOR)</b> Total Major Permits Issued <u>Outside</u> Decision Timeline (90 Days):	<b>4 (2%)</b>
<b>PERMIT TIMELINES (MINOR)</b> Total Minor Permits Issued <u>Within</u> Decision Timeline (30 Days):	<b>348 (86%)</b>
<b>PERMIT TIMELINES (MINOR)</b> Total Minor Permits Issued <u>Outside</u> Decision Timeline (30 Days):	<b>59 (14%)</b>
<b>VARIANCE FROM TIMELINES</b> Reason for Variance from Timelines (Optional):	<ul style="list-style-type: none"> <li>- Complexity</li> <li>- Proponent Requested Holds</li> <li>- Multiple Resubmissions / Proposal Changes</li> </ul>

<sup>1</sup> Note: For the first Annual Report using this framework will only capture permits issued from April 1 – December 31, 2024.

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<b>Annual Reporting – Permit Timelines cont.</b>	
<b>PERMIT TIMELINES (AVERAGE – ALL)</b> Overall Average Permit Review Timeline:	<b>Average of 16 days</b>
<b>PERMIT TIMELINES (AVERAGE – MAJOR – 90 DAYS)</b> Average Major Permit Review Timeline:	<b>Average of 19 days</b>
<b>PERMIT TIMELINES (AVERAGE – MINOR – 30 DAYS)</b> Average Minor Permit Review Timeline:	<b>Average of 15 days</b>
<b>Annual Reporting – Compliance with O. Reg. 41/24</b>	
<b>MAPPING</b> Are maps of regulated areas available at the CA head office and on the CA website? (ss. 4(1) of O. Reg. 41/24)	<b>Yes</b>
<b>MAPPING</b> Has the Authority undertaken an annual review of the mapping and made necessary updates? (ss. 4(2) of O. Reg. 41/24)	<b>Yes</b>
<b>ADMINISTRATIVE REVIEWS</b> Total requests for administrative reviews made to the Authority:	<b>0</b>
<b>ADMINISTRATIVE REVIEWS</b> Total administrative reviews completed within 30 days of the request:	<b>N/A</b>

Assumptions include the following:

- All infrastructure permits and development planning permits were identified as “Major” or “Minor” depending on the complexity of the application per the definitions in the Template;
- Pursuant to the CA Act and O. Reg. 41/24, the completeness review timeline is identified as 21 days;

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- Only the first complete application review for each permit is reported;
- CO Decision Timelines are 90 and 30 calendar days for “Major” and “Minor” permits, respectively; and
- As a result of the legislative changes on April 1, 2024, and consistent with advice from Conservation Ontario, only permits received and issued between April 1, 2024 and December 31, 2024, were included. Some permits received before April 1, 2024 and issued within this window are not included.

Of the 634 permits received and issued between April 1, 2024, and December 31, 2024, 227 were “major” permits and 407 were “minor” permits. 582 or 92% of the complete application reviews were completed within the legislative timeline. 571 or 90% of the permits met the CO Guideline, which exceeds the 80% objective. The latter is consistent with the 90% achieved in 2023, but it is important to note that the revised CO Guideline requires accelerated service delivery over previous Guidelines. Accelerated service delivery was achieved despite transition to the implementation of legislative changes and the soft launch of our new digital Planning Application Review and Enforcement System (PARES) in 2024. Applications that did not meet the Guideline include complex infrastructure and development permits requiring multiple submissions. In some cases, the reviews may have been impacted by holds at the proponent’s request or multiple resubmissions / proposal changes. Permit review timelines from when a complete application is received are at an average of 16 days, with 19 days for major permits and 15 days for minor permits.

This is the fourth year of TRCA’s annual reporting to the Board of Directors on Section 28 permit application service delivery and staff continue to anticipate reporting annually. However, further to RES.# A38/19, staff have been meeting regularly with the Building Industry and Land Development Association (BILD) to provide updates and receive feedback on service delivery. Feedback from BILD members has been positive and appreciative of TRCA’s commitment to excellence in service delivery.

TRCA is in the process of implementing a soft launch of PARES with our selected enterprise software vendor. The client facing component of the system is anticipated to launch in 2025. This digital file management software will result in more streamlined review. We anticipate the software

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will assist staff with meeting our obligations under the revised regulatory framework. Due to current fee increase restrictions imposed by the Province and despite the success of above noted streamlining efforts, TRCA does foresee increased challenges in meeting service delivery standards tied to our inability to fully recover the costs for permit reviews. TRCA will continue to work with other CAs to request an end to the Provincial fee increase restriction.

### **Relationship to TRCA's 2023-2034 Strategic Plan**

This report supports the following Pillars and Outcomes set forth in TRCA's 2023-2034 Strategic Plan:

#### **Pillar 1 Environmental Protection and Hazard Management:**

- 1.1 Deliver provincially mandated services pertaining to flood and erosion hazards

#### **Pillar 4 Service Excellence:**

- 4.2 Provide and manage an efficient and adaptable organization

### **FINANCIAL DETAILS**

Section 28 permitting services are funded through permit application fees, account code 110-05.

### **DETAILS OF WORK TO BE DONE**

Staff will continue to report annually on the service delivery for Section 28 Permit applications annually.

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**Date: February 12, 2025**