CITY OF BRANTFORD

Development Approvals Process (DAP) Review & Technology Modernization

October 2021

Submitted by:

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In Association with:
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Submitted to:

City of Brantford

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1.0 Preamble

The Development Approvals Process (DAP) is a core City of Brantford service delivered with input from various Provincial agencies. The delivery of DAP can be challenging from a coordination and process execution point of view. DAP features a series of complicated technical back-and-forth interactions between City staff and development applicants/consultants - the DAP "ping-pong" game. Differences in approach across Ontario municipalities can be confusing, and applicants can lose confidence in the efficiency and consistency of the DAP model. The City of Brantford is committed to streamlining its current DAP processing model and modernizing the associated information technology platform/toolkit.

Timely and consistent DAP process execution by the municipality will provide cash flow/financing predictability for new development interests coming to Brantford. Existing residents and businesses will have improved confidence that diligent/consistent DAP execution will support their quality-of-life goals and promote community prosperity.

The City of Brantford retained Performance Concepts/Dillon to conduct this Review in Q2 2021. The Brantford DAP review has been conducted under the auspices of the Province's Audit and Accountability Fund Grant Program. The Audit and Accountability Fund Program requires the Performance Concepts/Dillon team to conduct an impartial and objective 3rd party review to identify efficiencies and performance improvement opportunities. The Final Report will be posted on the City of Brantford website as per the requirements of the Provincial program.

The Brantford DAP review has been executed exclusively on-line during the COVID-19 pandemic. Performance Concepts/Dillon would like to acknowledge the focus, perseverance and flexibility of the multi-departmental City staff team that supported the DAP review using video conferencing tools such as GoToMeeting, Microsoft Teams, Zoom and Mentimeter.com.

The COVID 19 pandemic has clearly demonstrated that traditional "over the counter" approaches to DAP execution can and should be modernized across the Ontario municipal sector. The Brantford DAP review has confirmed that the municipality can transform the applicant' experience via new technologies such as an on-line development approvals portal and an upgraded/fully implemented AMANDA workflow software solution.

The Performance Concepts/Dillon team congratulates Brantford for completing this DAP review under the evolving circumstances of the COVID 19 "new abnormal". This Final Report meets the requirements of the Audit and Accountability Fund Program and positions the City to proceed with the recommended Implementation Roadmap in Q4 2021 and beyond.

2.0 Executive Summary

The Development Approvals Process (DAP) is a forward-facing core service delivered by the City of Brantford. The Development Approvals Process is a *regulatory* service anchored in the Planning Act, the Municipal Act, and the Building Code Act. Brantford's 2021 DAP Review is focused on the Planning/Engineering component of the overall process - although it does address opportunities for a streamlined transition (i.e., the baton handoff) into the City's Building permit application process. An improved/transformed DAP model in Brantford will require growth-pays-for growth revenue stream upgrades, process streamlining, organization re-design, IT platform improvements, staffing/resourcing adjustments and a results-driven culture focused on measurable processing time targets.

An optimized DAP model will be critically important to Brantford as Council grapples with new intergovernmental fiscal realities and tries to secure a fiscally sustainable recovery from the COVID generated recession. Upcoming greenfield development processed by an optimized DAP model may generate financial self-reliance for the City in a challenging Federal/Provincial/Municipal financial environment.

Transforming Brantford's Development Approvals Model: The Imminent Challenge Posed by Growth

Across the past two decades Brantford has been a moderate growth municipality. Subdivision generated residential growth has been steady year-over-year but has never approached the levels experienced in greenfield municipal "growth factories" like Brampton or Milton. Site Plan driven greenfield and infill growth has been steady - averaging 30-40 files annually. This historic pattern is coming to an end. Brantford is poised to become a major growth site in the Golden Horseshoe. The growth challenge will be three pronged:

- Infill growth within the existing built-up area. The City's DAP processing effort for this growth will exceed the processing effort for comparable greenfield projects.
- Greenfield growth within the City's traditional urban boundary.
- New greenfield growth across the Brant boundary lands (north) and Tutela Heights

Over the coming three decades an estimated 29,000+ housing units will need to be approved across Planning/Engineering/Building DAP. Roughly half of these units will be positioned within the existing built-up area (infill) and half will be positioned on greenfield sites. *(see chart on next page)*

Proposed Housing Unit Growth, 2016 to 2051	Designated Greenfield Area (DGA) (Existing DGA and Future Brant Lands DGA)	Built-Up Area
2016-2021	1,160	775
2021-2031	**5,000**	**4,080**
2031-2041	4,985	4,930
2041-2051	4,375	4,330
Total Units	**15,520**	**14,115**

Greenfield residential units will be evenly split between existing lands within the traditional urban boundary and the Brant boundary lands + Tutela Heights).

Proposed Allocation in the Designated Greenfield Area (DGA)	
Existing DGA	7,645
New DGA	7,880
Total Units	**15,525**

Brantford is engaged in a race to modernize and transform its Planning/Engineering DAP model to absorb and process at least a doubling of Planning/Engineering Review application volumes/workload. This race is already underway since multiple Brant boundary land block plan approvals are imminent in 2022. There is no time to lose in building out DAP surge capacity and file processing efficiencies. The DAP processing challenge will stretch across multiple decades - it is not a one-time growth surge. It is a new ongoing reality as Brantford transforms into a major - perhaps THE major – Greater Golden Horseshoe growth municipality.

Provincial Government Ratcheting Up the Risks of an Under-Performing DAP

The Province has relentlessly increased pressure on municipalities to accelerate DAP processing velocity. Bill 108 has compressed the "no municipal decision" timeframes trigger for an Ontario Land Tribunal (OLT) appeal (see table below).

Bill 108 is a DAP Timeframes Game Changer

	Pre-Bill 139	Bill 139	Bill 108
Official Plan Amendment or OPA/Re-Zoning Combo Pack	180 Days	210 Days	120 Days
Re-Zoning	120 Days	150 Days	90 Days
Subdivision Draft Plan	180 Days	180 Days	120 Days

Site Plan Section 41 "no decision" trigger for OLT/LPAT is 30 Days

When City staff are pulled into effort intensive OLT appeal, staffing capacity to process ongoing DAP applications is compromised. A chain reaction of "no decision" appeals can have a profoundly negative impact on DAP performance - resulting in a "planning by OLT" scenario that is contrary to local democracy and community-based planning for growth. DAP modernization is a critically important risk mitigation tool to avoid a "planning by OLT" scenario in Brantford.

Towards "As Should Be" DAP Transformation

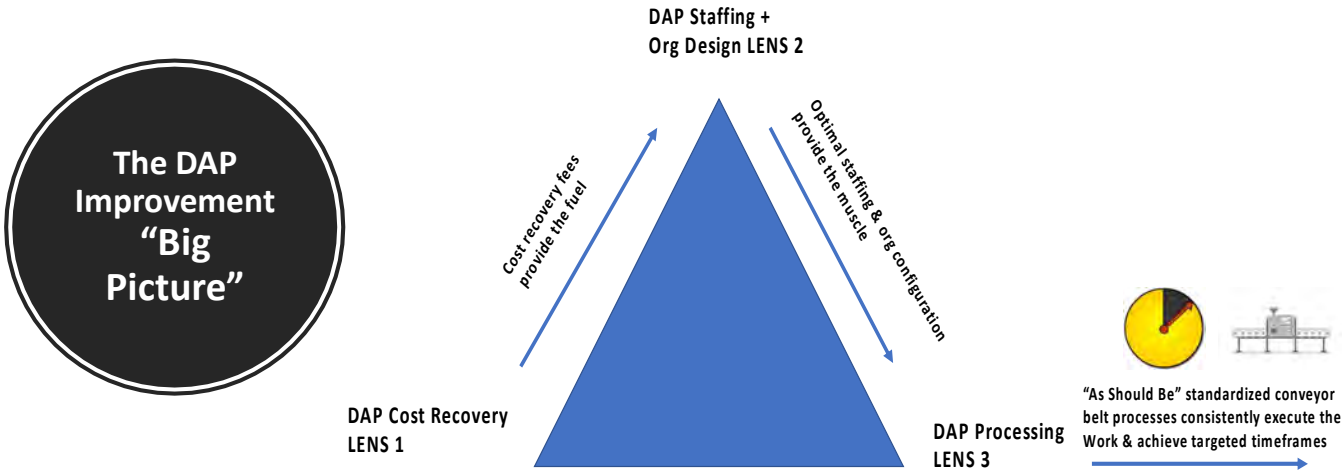
Transforming DAP into a high-performance service delivery model requires sustained improvement/modernization across three performance lenses (see figure below).

The 1st "big picture" performance lens is the DAP cost recovery/revenue stream lens. DAP fee design innovations and aggressive "growth pays for growth" fees pricing are critical ingredients to provide the fuel for robust/necessary DAP staffing investments.

The 2nd big picture performance lens is the DAP staffing/org design lens. A robust staffing model that delivers the right amount/right cross-disciplinary mix of staff processing hours is essential to high performing DAP. Councils are more likely to approve robust staffing investments when the DAP fees fuel minimizes/eliminates property tax subsidization. An optimal org design is the final ingredient. One-stop-shop integrated Planning/Development Engineering models can be effective. So can integrated Development Engineering/Public Works models.

The 3rd big picture performance lens is the creation of "As Should Be" streamlined/coordinated DAP processes supported by a modernized IT portal/workflow tool solution. Process innovations that improve up-front submission quality pay downstream dividends during effort intensive Technical Review Cycles. Delegated Council approvals to staff also pay significant processing time dividends.
All three big picture performance improvement lenses interact to create the transformation benefits that Brantford requires to meet the challenge posed by imminent DAP application volumes. Detailed

portfolios of "As Should Be" performance insights, value-for-money analyses and staffing business cases are contained in the body of this Report - they have informed the development of 30 specific DAP modernization/improvement Recommendations.



DAP Modernization/Improvement: Strategic and Tactical Recommendations plus a Rapid Implementation Roadmap

DAP modernization/performance improvement recommendations have been categorized as either Strategic or Tactical. A Rapid Implementation Roadmap has been developed to triage/manage change according to the following timeframes:

Do Now Recommendations within the Rapid Implementation Roadmap require action/execution within 6 months.

Do Soon Recommendations within the Rapid Implementation Roadmap require action/execution within 12 months.

Do Later Recommendations within the Rapid Implementation Roadmap require action/execution beyond 12 months.

Where more than one timeframe is referenced in the following section, the intention is to describe an implementation transition over time.

Revenue Stream Modernization Recommendations + Roadmap

The following Strategic and Tactical Recommendations will ensure modernized/robust DAP non-property tax revenue streams are in place to fuel a "Growth Pays for Growth" service delivery model.

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S1	The City has not yet structured Planning/Engineering DAP as a full-cost recovery Enterprise business model like Building DAP. The activity-based costing justification for modernized DAP fees has not been undertaken.	Confirm and document the City's existing 90% "Growth Pays for Growth" Planning DAP Cost Recovery Target by Conducting a Full-cost DAP Fee Review.	Modernized full cost DAP fees will supply the sustainable revenue stream required to fund a robust City staffing model. That staffing model will, in turn, execute timely/consistent DAP processes meeting targeted timeframes. Fee adjustments can be phased in across a three-year period.	✓	✓	
S2	Current City revenue and Cost accounting/Budgeting structures do not document the true all-in costs of Planning/Engineering DAP.	Implement an Enterprise- style Revenue and Cost Accounting/Budgeting model for Planning DAP (linking Fee revenues to eligible DAP Cost centres).	Creates Enterprise cost recovery consistency across Development Planning, Development Engineering and Building service delivery channels	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T1	Peer municipal comparisons of DAP fee structures reveal Brantford's current "flat fee" structure for Multi-residential Site Plans does not reflect best practices in fee design	Modernize Site Plan Fee Design by adding a per-unit escalator to Multi-Residential Site Plans. Justify new escalator with supporting activity-based costing analysis.	A modernized Site Plan fee structure will improve fairness across simple and complex projects (with differences in unit counts acting as a proxy for complexity). The recommended DAP Fee Review will finalize the design details of the new Site Plan fee structure.	✓	✓	
T2	Peer municipal comparisons of DAP fee structures reveal Brantford's current "flat fee" structure for Commercial/Industrial Site Plans does not reflect best practices in fee design	Modernize Site Plan Fee Design by adding a GFA escalator to Commercial/Industrial Site Plans. Justify new escalator with supporting activity-based costing analysis.	A modernized Site Plan fee structure will improve fairness across simple and complex projects (with difference in GFA acting as a proxy for complexity)	✓	✓	
T3	Peer municipal comparisons document the reality that Brantford's current 5.5% Engineering Construction fee rate is below greenfield municipality norms	Adjust the rate for the City's Development Engineering % Construction Value Fee to 6% - thereby improving "fit" with peer growth municipalities.	Improved revenue generation will support a robust Development Engineering staffing model required for the upcoming spike in Subdivision Draft Plan applications & Post-Draft Plan Detailed Engineering Review Phases	✓		

Staffing & Resources Recommendations + Investment Roadmap

Once DAP fee modernization is in place, robust staffing investments are required to modernize DAP and secure processing timeframes predictability. Failure to secure processing timeframe predictability will expose the City to a worst case "planning by OLT/LPAT" risk scenario. Resourcing investments in additional DAP staff (business case justifications) are contained in the body of this Report.

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S3	Detailed DAP application volume/workload projections prepared by Performance Concepts justify a business case for an additional 10 FTE within the Development Engineering business unit.	Approve & Execute the Development Engineering *Staffing Business Case* set out in this Final Report.	The Development Engineering *Staffing Business Case* "ask" for 10 FTE will enable the City to approve/ on-board $335 M+ in required road, water, wastewater, and stormwater infrastructure. This fee supported staffing "ask" will have no property tax impact.	✓	✓	
S4	The current organizational alignment of Development Engineering in a different Department than Development Planning and Building is sub-optimal from a DAP performance perspective.	Implement *One Window* Organization Re-Design to integrate Development Planning, Development Engineering and Building business units within a single department.	Seamless alignment/coordination of Development Engineering within a new "all DAP" Commission will improve workflow performance and is consistent with the recommended *One Window* approach to governance reform achieved via a new DAP Committee of the Whole (COW).	✓	✓	

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S5	Brantford's finite DAP staffing capacity is being consumed by extensive "pre Pre-Consult" exploration discussions that properly fall within the purview of Economic Development in most Greater Golden Horseshoe growth municipalities. This support model for supporting exploratory development enquiries from smaller Brantford development community actors is not sustainable given the impending spike in DAP workload facing the City.	Brantford should establish a development facilitation Concierge position within the Economic Development division, to support small builder/developers and free up DAP staff for their core review function.	The City's finite DAP staffing capacity will be freed-up to focus on serious/formal DAP applications poised to move forward, while proponents requiring pre-DAP exploratory support will be routed to an appropriate/qualified Economic Development concierge who will support the "pre Pre-Consult" dialogue.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T4	Performance Concepts/Dillon has independently reviewed City staff's proposed staffing upgrades required to generate additional Planning DAP processing hours to meet the impending infill and greenfield applications/workload spike.	Approve & Execute the Development Planning *Staffing Business Case* set out in this Final Report • New staffing model to consist of 4 Senior Planners, 2 Intermediate Planners, 2 Junior Planners + administrative a non-Planner coordinator for the Committee of Adjustment	The Development Planning *Staffing Business Case* will reduce the risk of undemocratic "planning by OLT" by ensuring stable/predictable application processing times that meet City timeframe targets.	✓	✓	
T5	AMANDA modernization / "As Should Be" workflow re-configuration is urgently required to meet the flow and sequencing challenges associated with the imminent spike in DAP application volumes/workload.	Deploy a new AMANDA Configuration & Training Senior Analyst	In combination with transitional AMANDA contractor expertise, the new AMANDA Senior Analyst will ensure Brantford wins the AMANDA configuration/preparation race with the DAP applications workflow spike. The recommended new Senior Analyst can in-turn train new staff super-users as required.	✓	✓	

DAP Conveyor Belt Process Streamlining & Technology Roadmap

Modernized DAP revenue streams invested in robust staffing investments will position the City to execute governance reform and "As Should Be" streamlined end-to-end DAP processes.

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S6	Expanded delegation of DAP approvals by Council to staff is a necessary processing efficiency to meet the challenge of the imminent applications spike. In the absence of expanded delegation additional staffing investments beyond those recommended in this Final Report will be required to ensure processing timeframes remain stable	Modernize DAP Governance – Expand Council Delegation of Approvals to Staff as per the October 2021 staff report to the Building Construction Process Review Taskforce	City staff processing capacity currently consumed by writing effort-intensive Council reports can be redeployed to technical review/approval of Site Plans and other delegated application categories. Estimated processing timeframe reductions of 2-3 months per file will be secured via expanded delegation. Relatively infrequent contentious files can still be escalated for Council consideration if absolutely required.	✓		
S7	Brantford's Committee of Whole governance model is not configured to deal with the new growth realities. Impending DAP applications volume spike will create unsustainable governance choke points in the current COW model.	Modernize City Governance model to meet DAP challenges – Create a new Committee of the Whole (COW) devoted exclusively to Planning/Engineering DAP, Planning Policy and Building	Will secure/protect adequate Decision-Making Bandwidth for Council to deal with the imminent spike in DAP applications. Will avoid decision-making choke points & reduce the risk of undemocratic "planning by OLT".	✓	✓	

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S8	Currently the overlapping processing of Planning/Engineering DAP files is not subject to stringent business rules defined by process trigger points. Both Planning and Building staff support AMANDA based coordination of overlapping processes.	Use AMANDA to document the specific processing triggers needed to coordinate the overlapping back-end of Planning/ Engineering DAP Subdivision, Site Plan and Minor Variance files with the front-end of Building permit Applications/Permit issuance	Using AMANDA to regulate/manage an orderly coordination of overlapping Planning/Engineering/ Building DAP processes will reduce the risk of processing errors/breakdowns in the imminent high volumes growth environment facing Brantford	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
		Pre-Consultation				
T6	The DAP file audit has demonstrated that a streamlined Pre-Consultation letter for simple/straightforward files can sometimes replace the Pre-consult meeting with applicants. This effort-saving process innovation will free-up staff capacity for other high value-added priorities.	While a Pre-consultation meeting is the default process requirement, the City should make use of a discretionary pre-consultation "results letter" for straight-forward applications that may not require a meeting. • The letter must provide a complete set of comments from all City departments, including identification of required studies and application submission items, as well as contact information specific to each department. • All communications between departmental contacts and the applicant must be shared with the File Planner for coordination purposes.	This effort-saving process innovation will free-up City staff capacity for other more complex Pre-consult meetings/files. Capacity will be at a premium in the impending high volumes environment facing Brantford.	✓		
T7	The DAP file audit has demonstrated that Pre-consultation meetings require improved focus on contentious issues as opposed to routine matters.	Refocus the DRC Pre-consult meeting towards discussion of comments that are likely to be contentious or have an impact on other technical disciplines present, or which have the potential to imply the need for revisions to multiple aspects of the proposal.	Improved Pre-Consultation performance will yield downstream efficiencies in the review and processing of complete/higher quality DAP application packages.	✓		

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T8	The DAP file audit has demonstrated that comments/checklists developed after Pre-consultation meetings should be consolidated to improve efficiency/consistency.	Issue a single, consolidated set of Pre-consultation staff comments, rather than the current approach of issuing both Preliminary and Final comments to the applicant.	Improved Pre-Consultation performance will yield downstream efficiencies in the review and processing of complete/higher quality DAP application packages.	✓		
T9	Best practices in GTA greenfield municipalities require applicants to acknowledge in writing the complete application submission requirements agreed to in a Pre-consultation meeting.	Create a formalized Pre-Consultation Understanding w/Applicants (featuring mandatory electronic acknowledgement by applicants to subsequently submit a complete application over the new DAP Portal).	A formalized Pre-Consultation Understanding will create accountability for the City and applicants as they move forward with submission of application packages across a new DAP online portal.	✓	✓	
T10	The current practice of using DRC meetings to deal with both Pre-Consults and actual DAP files will not be sustainable once the imminent spike in applications occurs. Existing DRC meeting bandwidth/capacity will be overloaded by new workload.	Create a new “Pre-Consults Only” set of scheduled DRC meetings to deal with the expected volume spike in development applications associated with imminent growth	A stream of “Pre-Consult Only” DRC meetings will protect the bandwidth/capacity of existing DRC meetings to deal with matters of substance associated with actual DAP applications.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T11	Growth municipality best practices require a 24/7 DAP online portal that can screen out incomplete application submissions. Brantford does not yet have a robust DAP portal to generate this kind of submission quality control functionality or 24/7 convenient customer service.	Implement a Portal/AMANDA solution to integrate the new electronic Pre-Consultation Understanding with a complete application submission over the Portal. Filter-out incomplete application submissions using the Portal as an impartial quality control tool.	A portal/AMANDA solution will filter-out incomplete application submissions using the Portal as an impartial quality control tool. This quality control functionality will reduce application completeness gaps and ensure staff focus their finite processing effort on higher quality submissions.		✓	✓
T12	Post-Draft Plan Detailed Engineering submissions do not benefit from the quality control rigour/efficiencies generated by the mandatory Pre-consultation model attached to Planning applications. Submission gaps/quality control problems are only discovered/addressed during the 1st Technical Review Cycle.	Implement a formal Pre-Consultation model for the Post-Draft Plan Detailed Engineering Review. Mirror the recommended Planning applications approach/process by creating a Pre-Consult Understanding.	As is the case with Planning applications, a formal Pre-Consultation model for Post Draft Plan Detailed Engineering submissions will improve quality/completeness, reduce the length of 1st Technical Review Cycles, and reduce the overall number of required Technical Review Cycles.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T13	Recommended Pre-consultation "As Should Be" processes/ timeframes/applicant obligations are not documented in a Pre-Consultation By-law	Draft and implement a Pre-Consultation By-law that defines procedural timelines and complete application submission requirements.	Improved documentation of "As Should Be" Pre-Consultation model in a By-law should add legitimacy/accountability to the new model within the development industry		✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
Application Processing						
T14	The City selectively applies a 2-step completeness/ adequacy check for some DAP application categories prior to applications being Deemed Complete. This effective quality control approach should be extended to all DAP applications – most notably Site Plans.	Implement a 2-step QA Process for the "Application Submitted to Deemed Complete" component of all DAP files. • The City's existing "shallow-dive" submission adequacy review (Step 2) should also be applied to all Post-Draft Plan Detailed Engineering Review phases moving forward.	Extending the 2-step submission completeness/adequacy check across all DAP applications + Detailed Engineering Review phases will improve the effectiveness of Technical Review Cycles – shorter cycles and fewer cycles will result.	✓	✓	
T15	Site Plans are not subject to the Planning Act "deemed complete" legal decision by the City so they cannot be refused at the application submission stage. However, "inadequate" applications can be processed in a different stream without guaranteed timeframe targets.	Exclude Site Plan applications deemed "inadequate" from the City's self-imposed processing timeframe service levels/targets. • Inadequate applications only to be processed "off the clock" once application quality gaps corrected. Will only receive a best-available-effort processing commitment.	Removing low quality/inadequate Site Plan applications from the normal stream of applications (with timeframe targets) will create an incentive for applicants to meet the quality commitments imbedded in the new (mutually agreed upon) Pre-Consultation Understanding. Site Plan application quality will improve over time as applicants seek to avoid the slower "best available effort" stream with no timeframe countdown clock.		✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T16	Improved/standardized formatting of Complete Application checklist requirements across different DAP application submissions will help streamline/standardize staff's review effort across the various Technical Review Cycles for a given application.	For projects involving multiple applications, City staff should clearly indicate which submission checklist requirements correspond with each distinct application. • Specifically, the submission checklist requirements should be segregated by separate application category for combo-packs of Site Plans, Re-zonings, Subdivisions, Condos. • This sorting of application submission requirements should be organized in a tabular/matrix format. Submission requirements to be listed in rows and application categories appearing in columns. A simple checkmark or other symbol to be used to indicate the applicability of each submission requirement pertaining to each application category.	Standardized formatting will contribute to more efficient execution of each Technical Review Cycle – an incremental reduction in cycle length should result over time.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T17	Improved/standardized formatting of Technical Review Cycle comments/approval conditions will help streamline the execution of Technical Review Cycles for a given application.	All staff Technical Review Cycle comments and approval conditions should be tracked by the City using unique identifiers (e.g., numbering) and provided to the applicant in the form of a standardized comment response matrix. • Likewise, applicants should be required to clearly indicate which comment or condition they are responding to by referencing the same unique numeric identifier as part of resubmission documentation. Applicants should respond directly within the same comment response matrix provided by the City.	Standardized formatting/numeric coding will contribute to more efficient execution of each Technical Review Cycle – an incremental reduction in cycle length should result over time.	✓	✓	
T18	Incremental process improvement opportunities in DRC meetings were documented during the Dillon file audit exercise executed as part of this DAP review.	City staff should Update the presentation template used in DRC meetings to review specific applications. • Include introductory slides that summarize key information (i.e., type of application, key dates, and applicant updates/ conversations to date).	Incremental improvements in the execution of DRC meetings will expand the capacity to deal with more applications per DRC meeting.	✓		

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
Processing Timeframes						
T19	1st Technical Review Cycles tend to be longer/more effort intensive than Subsequent Review Cycles. It is not appropriate to inflexibly apply a single timeframe target to all Review Cycles given this reality.	Create differential processing timeframe KPIs and Targets for the 1st Technical Review Cycle vs Subsequent Review Cycles.	Differential Technical Review Cycle timeframe targets will help the City to address higher volumes/complexities associated with the expected simultaneous spikes in infill and greenfield DAP applications		✓	✓
T20	Site Plan timeframe targets should be informed by actual measured timeframes documented by AMANDA countdown clock functionality. Initial targets can/should be revised to reflect actual performance and on-the-ground staff resourcing realities.	Establish an initial Target timeframe for Site Plan Technical Review Cycle #1 at 30 controllable business days. Establish an initial Target timeframe for subsequent Site Plan Technical Review Cycles at 20-25 controllable business days based on a complexity designation by staff.	Timeframe targets supply development industry applicants with stable/accountable estimates of DAP approvals – critical information to manage project cashflow and design/construction supply chains. Timeframe targets supply Council and staff with critical decision support data to inform budget cycles, staffing decisions and IT modernization upgrades.		✓	✓

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T21	Draft Plan of Subdivision timeframe targets should be informed by actual measured timeframes documented by AMANDA countdown clock functionality. Initial targets can/should be revised to reflect actual performance and on-the-ground staff resourcing realities.	Establish an initial Target timeframe for Subdivision Technical Review Cycle #1 at 35 controllable business days. Timeframe targets for Complex files can be adjusted based on a designation by staff. Establish Target timeframe for subsequent Subdivision Technical Review Cycles at 30 controllable business days. Timeframe targets for Complex files can be adjusted based on a designation by staff.	Timeframe targets supply development industry applicants with stable/accountable estimates of DAP approvals – critical information to manage project cashflow and design/construction supply chains. Timeframe targets supply Council and staff with critical decision support data to inform budget cycles, staffing decisions and IT modernization upgrades.		✓	✓

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T22	Post-Draft Plan Detailed Engineering Review timeframe targets should be informed by actual measured timeframes documented by AMANDA countdown clock functionality. Initial targets can/should be revised to reflect actual performance and on-the-ground staff resourcing realities.	*Establish Target timeframe for Detailed Engineering Review Cycle #1 at 30-35 controllable business days.* • Timeframe targets for Complex files can be adjusted based on a designation by staff. *Establish Target timeframe for Subsequent Detailed Engineering Review Cycles at 30-35 controllable business days.* • Timeframe targets for Complex files can be adjusted based on a designation by staff.	Timeframe targets for Detailed Engineering Review Cycles supply development industry applicants with stable/accountable estimates of lot registration and Building permit application/issuance dates – critical information to manage project cashflow and construction supply chains. Timeframe targets supply Council and staff with critical decision support data to inform budget cycles, staffing decisions and IT modernization upgrades.		✓	✓

#	*As Should Be Finding*	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
Engineering Review and Post-Construction Inspections						
T23	The DAP greenfield approvals model features complicated coordination/sequencing challenges during the Post-Draft Plan phase of infrastructure approvals that culminate in the creation of registered lots. Brantford has struggled to optimize the sequencing of Engineering design approvals, Ministry of the Environment approvals, and early servicing arrangements.	Use AMANDA "drawbridge" functionality to Improve coordination of Post-Draft Plan Detailed Engineering Review, Ministry of the Environment Approvals, and a new/formal Early Servicing Agreement. • Detailed Engineering Review Cycles (design approval) to be completed and Ministry of Environment Approvals to be in place, prior to final execution of new Early Servicing Agreement.	Using AMANDA to sequence/coordinate Post-Draft Plan greenfield approvals will reduce the risk of the City approving/ onboarding sub-standard infrastructure. Proper sequencing will also eliminate choke points/delays in the overlapping baton handoff from Engineering DAP to Building DAP.		✓	✓

#	*As Should Be Finding*	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T24	Inefficient post-construction clearance of Development Agreement Conditions (Subdivision or Site Plan) cannot be sustained once the imminent development applications spike occurs. A new "As Should Be" process organized around seasonal timeframe realities and clearly documented processing timeframe requirements will be essential to meet the realities of the upcoming spike in application volumes and the subsequent inspection workload.	Restructure delivery of Post-Construction Inspections and Security Release based on a May 1st to Oct 31st annual season, thereby creating a necessary blackout period across the remainder of the calendar year. • Deliver Inspections within 30 business days of confirmed scheduling with applicants. • Deliver the City's Security Release Decision within 5 business days of executed Inspections.	Applicants and staff will be guided by the clear and accountable business rules and timeframes for securing Condition Clearance and Securities Release. The City will be able to execute these responsibilities with a reasonable staffing investment if the new model is understood and adhered to by development industry applicants.		✓	✓

Roadmap to Build a Results Based Scorecard & Culture of Accountability

Measuring and reporting DAP results is critically important for service delivery execution and accountability. DAP measurement tools and performance targets will require an updated/modernized AMANDA workflow tool configuration. City leadership will also need to champion a DAP culture of accountability, where all City staff/business units commit to timely data population of AMANDA and utilize AMANDA reports/prompts as the central nervous system for navigating the upcoming tsunami of files that are going to be moving across the DAP conveyor belt.

#	As Should Be Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S9	Measuring timeframes and establishing measurement informed timeframe targets is critical to transforming DAP and meeting the imminent challenges of simultaneous infill and greenfield growth in Brantford.	Commit to this Report's 6-Step Roadmap to establish Key Performance Indicators (KPIs) and DAP Performance Targets that are integrated into the annual budget decision-making cycle	KPIs populated via AMANDA will supply data/evidence to inform target setting and manage actual DAP results. Targets reflecting actual results will drive continuous improvement and provide certainty/predictability for development industry applicants. The risk of industry players opting for "planning by OLT" approaches will be significantly reduced.		✓	✓
S10	Accountability tools that transparently report actual DAP results against DAP timeframe targets should be designed/adopted to drive ongoing DAP performance improvements.	Implement an Annual DAP Public Performance Scorecard and incorporate KPI data into an ongoing annual Plan–Do–Check–Act cycle of service delivery execution/continuous improvement	Transparent public target setting and results reporting will drive DAP continuous improvement and provide certainty/predictability for development industry applicants.		✓	✓

#	As Should Be Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T25	AMANDA needs to function as the City's "central nervous system" of DAP workflow planning/tracking/reporting. AMANDA configuration requires all City staff involved in DAP to be AMANDA literate and committed to daily data tracking within AMANDA to ensure effective workflow management actually happens.	Configure AMANDA to produce required DAP processing timeframe data flows to populate the portfolio of KPIs put forward in this Report	AMANDA configuration will supply the business intelligence linchpin required to modernize DAP workflows and secure a results-based approach to continuous improvement.		✓	✓
T26	Once DAP timeframe tracking has been operationalized in AMANDA the City can/should commit to timeframe targets imbedded in accountability documents.	The City should establish Council approved timeframe target MOUs for the key Planning DAP application categories, Post-Draft Plan Detailed Engineering Review phases, and Post-Construction Inspections/Security Release Decisions • Timeframe MOUs to be endorsed by all City business units participating in DAP, posted on the City website, and shared with Development Industry/ Applicants at Pre-Consult sessions	Transparent DAP timeframe accountabilities will ensure the City staffs DAP appropriately to achieve its MOU commitments and meets the processing timeframe challenges inherent in simultaneous infill and greenfield application volumes spikes.		✓	✓

#	As Should Be Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T27	DAP applicants and the public should be provided with high-level information about the progress of applications across the various approvals channels.	Configure new DAP Portal to provide Applicants/Public with a viewing lens to track application processing milestones progress and timeframe target achievement	Portal based public access to application status/progress the across DAP channel in-progress timeframes versus targets) is consistent with a City MOU commitment to DAP targets and transparent accountability reporting.			✓

DAP Modernization/Performance Improvement: Measurement Lenses to Consider

The DAP performance challenges facing Brantford moving forward are focused on capacity building, process streamlining and IT platform modernization. Therefore cost reduction/cost avoidance is not a helpful lens for measuring the performance improvement dividend that can be secured by implementing the Recommendations contained in this Report.

DAP performance improvement is best considered via an alternative lens that is consistent with LEAN thinking principles that focus on managing turnaround/through-put timeframes. A LEAN improvement lens that measures turnaround/through-put times is consistent with industrial/manufacturing analogy of a DAP conveyor belt producing a series of "black box" application approval products. This performance lens is also consistent with the Province's mandated "no municipal decision" timeframes that can trigger an OLT/LPAT appeal by applicants.

Performance Concepts estimates that successful implementation of the "As Should Be" recommendations advanced in this Report will stabilize turnaround times at/below existing levels (for the planned/predictable annual volume of applications associated with the Area Specific DC Background Study). The community benefit associated with Recommended DAP improvements can be measured using the following metrics:

Annual Reporting of DAP Service Delivery Net New Benefits

1. DAP will deliver $350M in new City infrastructure associated with the processing development applications on the Brant lands across 2021-2051 → DAP Benefit KPI = Annual $35M value of transferred infrastructure to City via DAP
2. DAP will deliver estimated new construction worth $6 to $7B on the Brant lands across 2021-2051 → DAP Benefit KPI= Annual Estimated $216M value of new construction within City via DAP

This modernized DAP efficiency dividend (estimate) is informed by the 30+ DAP reviews executed across Canada by Performance Concepts/Dillon since 2006.

3.0 Introduction

3.1 Introduction – Brantford's DAP Challenge

The Development Approvals Process (DAP) is a forward-facing core service delivered by the City of Brantford. The Development Approvals Process is a *regulatory* service anchored in the Planning Act, the Municipal Act, and the Building Code Act. Brantford's 2021 DAP Review is focused on the Planning/Engineering component of the overall process - although it does address opportunities for a streamlined transition (i.e., the baton handoff) into the City's Building permit application process.

The Planning/Engineering DAP service delivery model is diverse and varied across Ontario's growing communities. Ontario municipalities deliver DAP via one of two jurisdictional models:

- ***Two-tier DAP*** delivered by an upper tier municipality (e.g., a Regional government) simultaneously interacting/coordinating with multiple local municipal delivery partners. Each jurisdiction is granted distinct approval authority for certain application categories. However, their DAP work processes are anything but distinct. Each level of municipal government in the two-tier model functions as a commenting agency on the applications processed by the other level. Two-tier DAP is rife with coordination challenges. For instance, Ontario's Regional governments are typically responsible for building/operating arterial road network, water, and wastewater infrastructure across multiple local municipalities, and they face a significant performance challenge interacting within a series of non-standardized local municipal DAP models. The myriad challenges facing an upper tier government simultaneously participating across several local municipal DAP "conveyor belts" - each featuring different processing timeframe targets/busyness levels/built form realities - are daunting from a logistics/execution perspective.

- ***Single-tier DAP*** where all application approvals are granted by a single municipality. This model is the default in Ontario jurisdictions without an upper tier County or Regional government - like Brantford. From a process execution perspective, the single-tier DAP model is inherently more efficient than the two-tier model. It avoids the interjurisdictional complexities and the coordination challenges inherent in the two-tier model. From an accountability point of view the single-tier model is also superior - there is no blame-game to be played between two levels of government if DAP performance is deemed sub-standard. The City of Brantford has an opportunity to capitalize on this built-in single-tier *efficiency dividend* as it confronts the imminent challenges of significant greenfield growth generated by the Brant boundary lands.

An improved/transformed DAP model in Brantford will require process streamlining, organization re-design, IT platform improvements, staffing/resourcing adjustments and a results-driven culture focused on measurable processing time targets. Performance Concepts/Dillon is confident that the highly competent/change oriented staff DAP team in Brantford is up to the task.

3.2 Weathering the COVID Storm – A Development Approvals Process & Technology Transformation

As noted in the Preamble to this Report, the Performance Concepts/Dillon team has executed this DAP review using an interactive set of online delivery platforms and tools.

Despite the challenges posed by closed municipal offices and social distancing/infection control protocols, the Performance Concepts/Dillon team has completed the Brantford DAP Review on time and within the upset budget envelope. City staff teams have been cooperative, accountable, and focused on performance improvement opportunities across the Review period. Project management leadership from the Office of the CAO facilitated efficient and effective execution of the work plan.

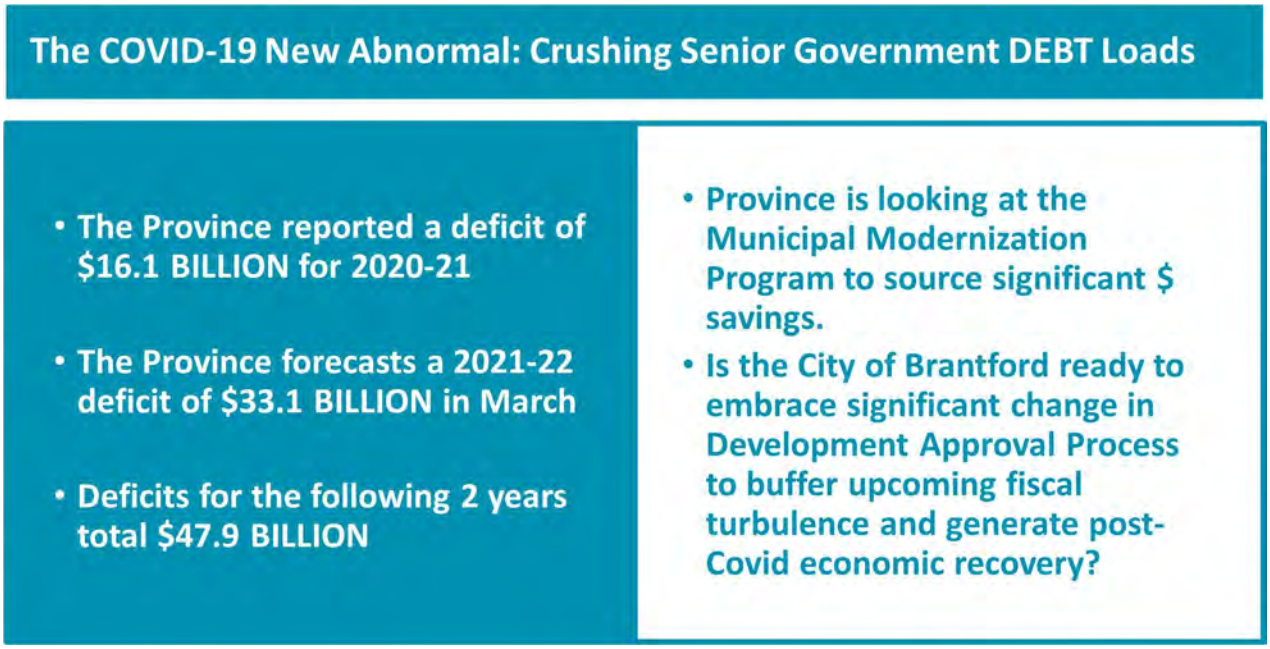
3.3 Provincial Financial Realities – The Municipal Self-Reliance Imperative

The Province's Audit and Accountability Fund Program pre-dates the COVID pandemic. The stated intent of the program is to support larger Ontario municipalities that are committed to identifying and implementing service delivery efficiencies. In the professional opinion of the Performance Concepts/Dillon team, Audit and Accountability Fund efficiency reporting for DAP reviews should using include a blend of the following performance lenses:

- Progress in securing a modernized Growth-Pays-for-Growth revenue model that recovers most DAP costs and transparently manages/controls any residual levels of property tax subsidization of development
- Progress in securing DAP process execution/productivity improvements secured via LEAN solutions that are leveraged by DAP portal/workflow tool modernization

Pre-COVID, public statements by the Premier indicated that Audit and Accountability Fund municipal efficiency dividends of 4% to 5% of targeted spending were achievable. In other words, the Province's original goal was to secure *incremental $ efficiencies* across the municipal sector. Pre-COVID, the Province's incremental improvement vision for the municipal sector seemed reasonably scaled. But now in 2021, the context and stakes around Audit and Accountability Fund DAP reviews have changed dramatically. The figures below are instructive in this regard. The already heavily indebted Provincial government will be more than $70B further in debt by the end of fiscal year 2021-22. A new provincial-municipal financial reality is now at hand.

An optimized DAP model will be critically important to Brantford as Council deals with these new fiscal realities and tries to secure a fiscally sustainable recovery from the COVID generated recession. Future development processed by an optimized DAP model may generate financial self-reliance for the City in a challenging Federal/Provincial/Municipal financial environment.



3.4 Post COVID-19 Game Changer: New Work/Live Commuter-shed

The COVID pandemic has altered long held household attitudes/calculations concerning work/live balance. Prior to the COVID pandemic, employees across urban Ontario selected their housing with the reality of the daily commute to their workplace firmly in mind. Tolerable daily commute times to the workplace largely defined the live/work balance housing choices made by hundreds of thousands of Ontario households. Housing prices have traditionally been impacted by the need for density and proximity to the workplace. Density has been a by-product of unavoidable daily commuting realities.

COVID has overturned the established work/live balance calculation. The COVID pandemic has served as an 18-month rolling experiment on the decentralization of Ontario's corporate and public sector workforce. On-line virtual platforms have now passed the feasibility test. The expensive commercial real estate model that centrally positioned entire workforces in the urban core of the GTA, Greater Ottawa and other large Ontario cities is transforming. It is highly unlikely that corporate Ontario or large public institutions will return to the traditional pre-COVID model. The flight from density is here to stay.

The post-COVID commuter-shed features knowledge workers in home offices that are fully equipped for online collaboration and can readily access employer databases. These employees will still make the commute to the employer's place of work - but will do so far less often across a typical month. Options/ decisions about where an employee can live are fast becoming uncoupled from the employer's geographic work location. If an employee chooses to take flight from Toronto-style density (and its astronomical housing prices), telecommuting from a home office for 16 workdays per month (while enduring four workdays with a long/grinding commute to the office) becomes tolerable. In fact, this new commuter-shed may also be desirable for employers who can downsize their workplace footprint and costs. The following figure documents 2020 household relocation data supplied by a Toronto real estate firm documenting the flight from density on one single day. Statistics Canada reports that the

Toronto CMA experienced an unprecedented reduction of 50,375 residents between July 2019 and July 2020. The trend has not abated across 2021.

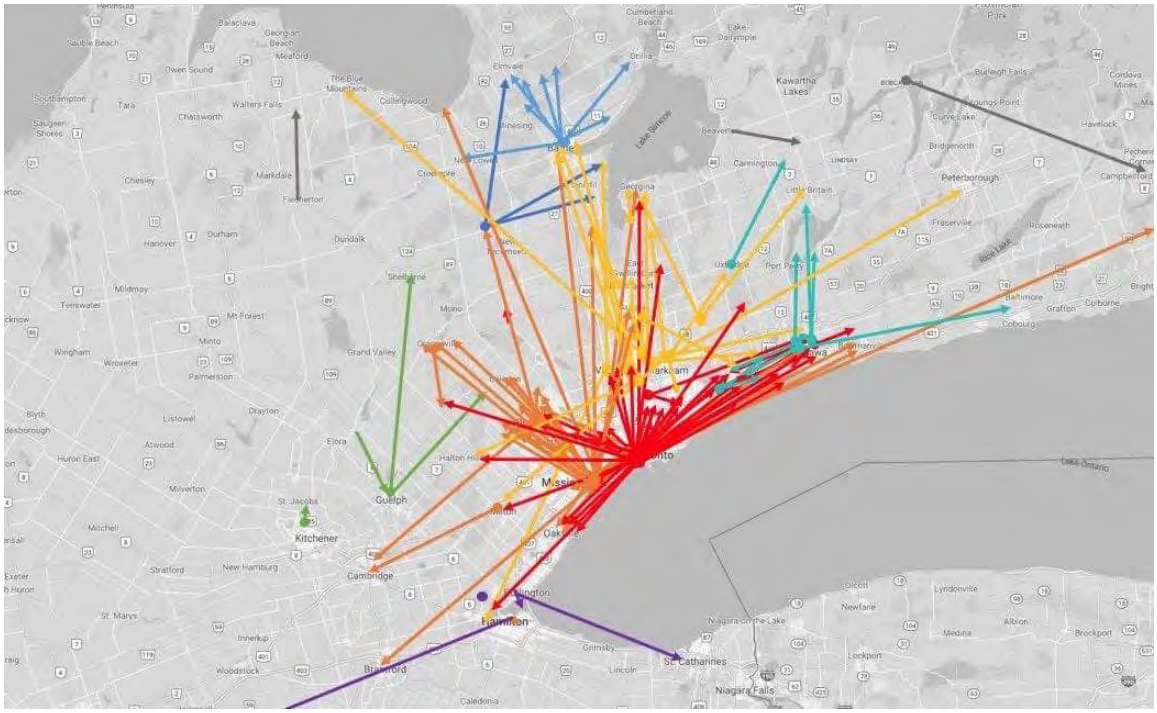


Figure 1 – Single day Real Estate Transactions out of Toronto visualized

The evolving/accelerating flight from density in the core of the GTA may have positive implications for the City of Brantford from an economic development perspective. The flight from density has informed this Review's conclusions around the need to rapid transformational change in Brantford's DAP model. If the City can transform its DAP model into a high volume, timely/consistent development conveyor belt, the flight from density may have a limited positive impact on Brant boundary land absorption rates. A restructured DAP model is an enabling factor to retain/attract new knowledge worker residents to Brantford - a positive result that will benefit the local economy and the taxable assessment base.

3.5 Transforming Brantford's Development Approvals Model: The Imminent Challenge Posed by Growth

Across the past two decades Brantford has been a moderate growth municipality. Subdivision generated residential growth has been steady year-over-year but has never approached the levels experienced in greenfield municipal "growth factories" like Brampton or Milton. Site Plan driven greenfield and infill growth has been steady - averaging 30-40 files annually. This historic pattern is coming to an end. Brantford is poised to become a major growth site in the Golden Horseshoe. The growth challenge will be three pronged:

- Infill growth within the existing built-up area. The City's DAP processing effort for this growth will exceed the processing effort for comparable greenfield projects.
- Greenfield growth within the City's traditional urban boundary.
- New greenfield growth across the Brant lands (north) and Tutela heights

Over the coming three decades an estimated 29,000+ housing units will need to be approved across Planning/Engineering/Building DAP. Roughly half of these units will be positioned within the existing built-up area (infill) and half will be positioned on greenfield sites.

Proposed Housing Unit Growth, 2016 to 2051	Designated Greenfield Area (DGA) (Existing DGA and Future Brant Lands DGA)	Built-Up Area
2016-2021	1,160	775
2021-2031	**5,000**	**4,080**
2031-2041	4,985	4,930
2041-2051	4,375	4,330
Total Units	**15,520**	**14,115**

Greenfield residential units will be evenly split between existing lands within the traditional urban boundary and the Brant lands (north + Tutela Heights).

Proposed Allocation in the Designated Greenfield Area (DGA)	
Existing DGA	7,645
New DGA	7,880
Total Units	**15,525**

Brant Boundary Lands: A Growth Game Changer

The Brant boundary lands are a gamechanger. Brantford is about to become a major greenfield municipal "growth factory" following in the footsteps already travelled by Milton and Brampton and Vaughan. Next door, Brant County is already going through a similar greenfield growth spike around Paris and beyond.

The following excerpts from the City's recently completed Area-Specific Development Charges Background Study (prepared by Hemson Consulting) are noteworthy. The Hemson projections set out in the figures below focus on the Brant northern lands and do not include the smaller, but still noteworthy, Tutela Heights growth.

The first DC Background Study chart below documents the need for an additional $335M in infrastructure spending by Brantford to service the Brant boundary lands. Most, but not all, of these capital costs will be DC funded. The City's Development Engineering business unit will be a central actor in this process of approving infrastructure design and on-boarding the actual built works.

TABLE 2A

CITY OF BRANTFORD
SUMMARY OF DEVELOPMENT-RELATED CAPITAL PROGRAM
NORTHERN BOUNDARY EXPANSION LANDS 2021 - 2051
(in $000)

Service	Development-Related Capital Program (2021 - 2051)				
	Gross Cost	Grants / Subsidies / Contributions	Replacement & Benefit to Existing	Post-2051 Benefit	Net Development Related Costs
	($000)	($000)	($000)	($000)	($000)
1.0 ROADS AND RELATED	$31,594.1	$0.0	$0.0	$0.0	$31,594.1
2.0 WATER SERVICE	$125,570.1	$524.0	$27,698.5	$5,373.0	$91,974.5
3.0 WASTE WATER	$123,371.5	$0.0	$24,386.9	$15,737.2	$83,247.4
4.0 STORM WATER	$54,416.0	$0.0	$32,372.6	$0.0	$22,043.4
TOTAL	$334,951.6	$524.0	$84,458.0	$21,110.2	$228,859.4

A second DC background Study excerpt (see chart below) documents the challenge of Brantford processing an estimated 7,688 new residential units of housing for 23,055 new residents.

Most importantly, the data in this chart reveals a front-end spike in the annual number of housing units forecast for construction - with 300+ annual new residential units becoming the norm for much of the coming decade. This growth alone represents a 75% to 100% increase over the City's recent 2019 and 2020 annual building permit volumes for singles/semis/townhouses. Planning/Engineering upstream development application review and approvals in 2022 and 2023 will/must precede the construction of this residential housing growth spike in 2024 and beyond. A point worth repeating: these workload projections do NOT address the additional greenfield development applications located within the existing urban boundary.

APPENDIX A
TABLE 1

CITY OF BRANTFORD
NORTHERN BOUNDARY EXPANSION LANDS
FORECAST OF TOTAL HOUSING BY TYPE

Mid-Year	Singles & Semis	Rows	Apartments	Total New HH
2021	**0**	**0**	**0**	**0**
2022	30	15	3	48
2023	124	63	10	197
2024	186	95	16	297
2025	217	111	20	348
2026	**249**	**128**	**22**	**399**
2027	218	112	19	349
2028	187	96	17	300
2029	153	83	14	250
2030	153	83	14	250
2031	**153**	**83**	**14**	**250**
2032	153	83	14	250
2033	153	83	14	250
2034	153	83	14	250
2035	153	83	14	250
2036	**153**	**83**	**14**	**250**
2037	153	83	14	250
2038	153	83	14	250
2039	153	83	14	250
2040	153	83	14	250
2041	**153**	**83**	**14**	**250**
2042	153	83	14	250
2043	153	83	14	250
2044	153	83	14	250
2045	153	83	14	250
2046	**153**	**83**	**14**	**250**
2047	153	83	14	250
2048	153	83	14	250
2049	153	83	14	250
2050	153	83	14	250
2051	**153**	**83**	**14**	**250**
2021 - 2051	4,723	2,530	435	7,688

APPENDIX A
TABLE 2

CITY OF BRANTFORD
NORTHERN BOUNDARY EXPANSION LANDS
FORECAST POPULATION GROWTH IN NEW HOUSEHOLDS BY UNIT TYPE*

Mid-Year	Singles & Semis	Rows	Apartments	Total Population in New HH
2021	**0**	**0**	**0**	**0**
2022	103	36	5	144
2023	425	152	16	593
2024	638	230	26	894
2025	744	269	33	1,046
2026	**854**	**310**	**36**	**1,200**
2027	748	271	31	1,050
2028	641	232	28	901
2029	525	201	23	749
2030	525	201	23	749
2031	**525**	**201**	**23**	**749**
2032	525	201	23	749
2033	525	201	23	749
2034	525	201	23	749
2035	525	201	23	749
2036	**525**	**201**	**23**	**749**
2037	525	201	23	749
2038	525	201	23	749
2039	525	201	23	749
2040	525	201	23	749
2041	**525**	**201**	**23**	**749**
2042	525	201	23	749
2043	525	201	23	749
2044	525	201	23	749
2045	525	201	23	749
2046	**525**	**201**	**23**	**749**
2047	525	201	23	749
2048	525	201	23	749
2049	525	201	23	749
2050	525	201	23	749
2051	**525**	**201**	**23**	**749**
2021 - 2051	16,228	6,123	704	23,055

The final excerpt from the City's Area-Specific DC Background Study reveals that significant non-residential growth will also occur within the Brant boundary lands. Some of this non-res growth will be spin-off commercial growth that inevitably follows subdivision residential development. Some of the non-res growth will be on the City's new designated employment lands.

Northern Boundary Expansion Lands Development Forecast	Growth 2021-2051
Residential	
Dwelling Units	7,688
Population in New Dwellings	23,055
Non-Residential	
Employment in New Space	14,739
Non-Residential Building Space (sq.m.)	1,284,690

The bottom line is a very likely surge in Subdivision and Site Plan generated DAP application volumes immediately following the completion of the Brant boundary land block plans.

Brantford is engaged in a race to modernize and transform its Planning/Engineering DAP model to absorb and process at least a doubling of Planning/Engineering Review application volumes/workload. This race is already underway since multiple Brant boundary land block plan approvals are imminent in 2022. There is no time to lose in building out DAP surge capacity and file processing efficiencies. The DAP processing challenge will stretch across multiple decades - it is not a one-time growth surge. It is a new ongoing reality as Brantford transforms into a major - perhaps THE major - Golden Horseshoe growth municipality.

4.0 Overview of Project Methodology

4.1 Doing the Right Things. Doing Things Right.

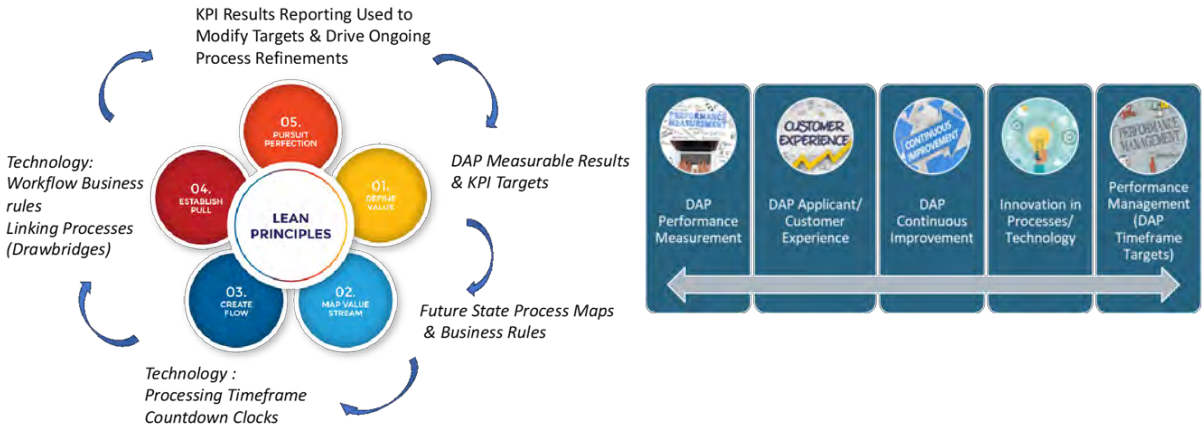
Successful DAP reviews are rooted in the following two overarching principles:

1. Accountable and innovative City governments strive to ensure they are ***Doing the Right Things***
2. Accountable and innovative City governments strive to ensure they are ***Doing Things Right***

Overarching Approach to Brantford's DAP Review

A properly designed and executed DAP review will engage City Council and staff in the ***Doing the Right Things*** and ***Doing Things Right*** improvement dialogue**.** Clearly defined Council (*Doing the Right Things*) and staff (*Doing Things Right*) perspectives are critical to a successful DAP review. Using LEAN thinking process solutions in tandem with technology modernization (to streamline, standardize and measure DAP execution) is practically synonymous with *Doing Things Right*.

The Power of LEAN Thinking to Transform DAP



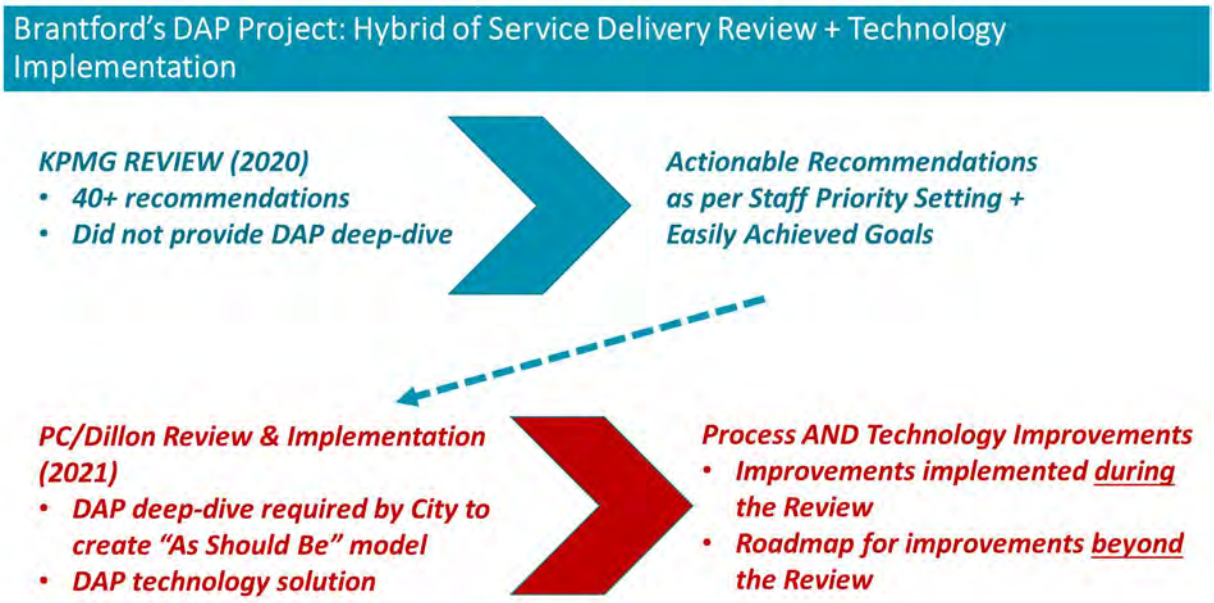
DAP reviews that confirm the need to do different things and/or do things differently are not automatically "right" or binding. Recommendations from a DAP review must pass through the lens of accountable City governance. Councils make change - not consulting teams. A well-crafted DAP review is politically astute without being overtly "political". Successful change/modernization agendas must secure implementation support from elected Councils that live in the real world. These reviews must combine technical proficiency with technology-driven innovation, and they must also support Council's accountability contract with its taxpayers, development community stakeholders, and residents.

4.2 Connecting the City's 2021 DAP Review to Previous DAP Work

The current DAP review is a hybrid. It builds on previous higher-level work executed by KPMG in 2020 by supplying a "deeper dive" into the technical complexities of City DAP processes and technology tools.

The 2021 DAP review has been designed and executed by the City and the Performance Concepts/Dillon team as a hybrid project - essentially completing the process improvement work that began in 2020 and layering in the portal/AMANDA technology modernization necessary to leverage performance improvement. The figures below document the alignment of the City's complimentary 2020 KPMG and 2021 Performance Concepts/Dillon reviews.

Brantford's DAP Project: Hybrid of Service Delivery Review + Technology Implementation

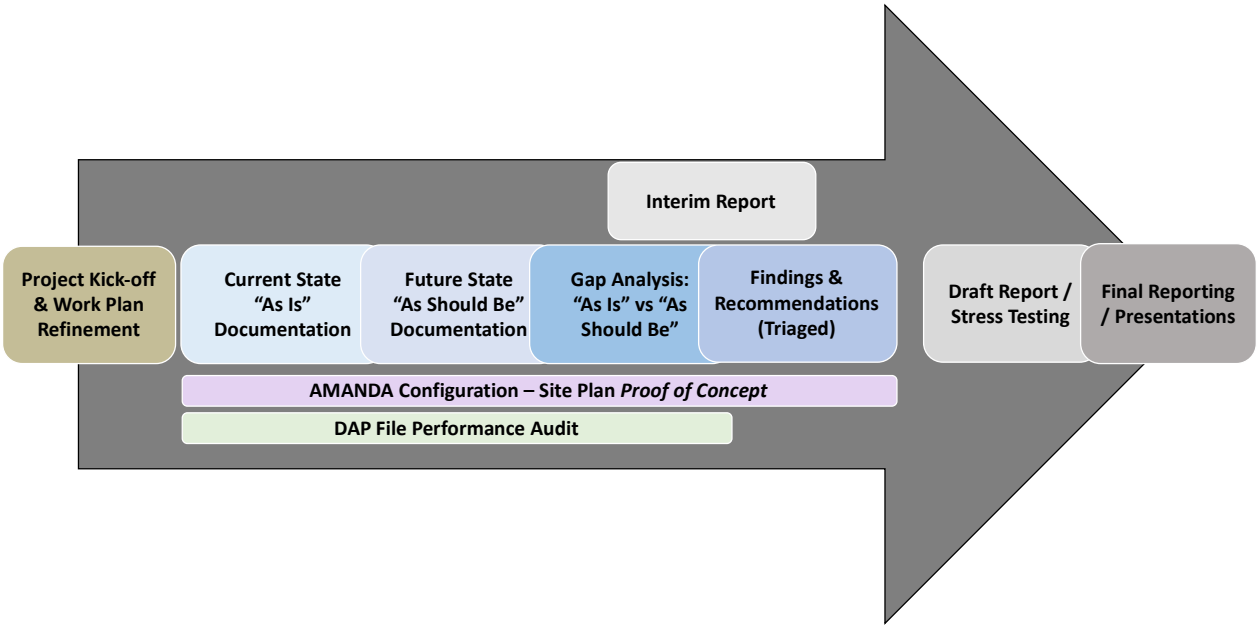


KPMG Solution Statements (2020)	P. Concepts Review Alignment with KPMG (2021)
Begin the transition to staff time tracking to improve process management and performance measurement by developing a business case for time tracking, identifying the benefits and associated costs	• *Focus on AMANDA configuration with processing time countdown clocks to measure City's controllable file days. Process maps document the On-Off use of countdown clocks across all DAP application categories*
Consider developing a measured delegation of authority such that Management can take decisions on approvals of small/frequent/less-complex applications.	• *Interim Findings memo re. expanded staff delegation. P. Concepts investigation of expanded delegation coordinated with City staff report prepared/reviewed by City's Building Construction Process Review Task Force*
Define and document development review-related roles and responsibilities to reduce process inefficiencies.	• *Org re-design and modernized AMANDA configuration each contribute to documented roles/responsibilities to deal with each submission checklist item attached to any given application submission*
Develop a detailed development application review process manual which clearly describes the expected quality of submissions and improve the availability of development review related information and data to enhance application quality. This should be supported by continuous communication efforts to constantly get these materials visible and part of standard application procedures.	• *"As Should Be" DAP process maps + Countdown clock processing time targets + a modernized AMANDA configuration each represent progress towards upgraded City Manuals that in fact already exist.*
Develop and implement standardized "Brantford Brand" comment templates in AMANDA to streamline workflow processes and timelines of reviews.	• *Site Plan Proof-of-Concept AMANDA configuration work achieves this KPMG Solution*
Develop criteria to structure the application recirculation process to reduce application review time and late-stage comments.	• *Site Plan Proof-of-Concept AMANDA configuration work achieves this KPMG Solution*
Empower the lead Planner to act as the application owner (concierge), to be fully in charge of all aspects of file management and operational decision making.	• *"As Should Be" process mapping confirms quarterback role for the File Planner. Org re-design creates simplified One Window business unit to support Planner's lead role*
Enhance application tracking procedures through improved use of tools (e.g., AMANDA, excel, etc.) to improve application tracking and identification of bottlenecks.	• *Site Plan Proof-of-Concept AMANDA configuration work achieves this KPMG Solution. City purchase of Planning/Condition Clearance models also contributes to improved tracking. "As Should Be" processes document "who does what" accountability.*
Ensure alignment of priorities across departments involved in the development review process	• *Org re-design creating "One Window" DAP department simplifies the cross-departmental alignment challenge.*
Establish internal review timelines for application submissions to ensure comments are given in a timely manner.	• *Focus on AMANDA configuration with processing time countdown clocks to measure City's controllable file days. Process maps document the On-Off use of countdown clocks across all DAP application categories*

KPMG Solution Statements (2020)	P. Concepts Review Alignment with KPMG (2021)
Explore the opportunity of implementing an online application submission system and electronic payment solution to facilitate the application submission and review process to improve process effectiveness and efficiency.	• *Recommends integrated AMANDA/Blue Beam/GIS & Portal solution. "As Should Be" process for Pre-Consult and Application Submission/Completeness Review designed around an upcoming online portal*
Identify a tool with the capacity to facilitate the circulations of applications and documentation of various sizes and establish a standard procedure for performing circulations to ensure consistency.	• *Focus on modernized AMANDA configuration with processing time countdown clocks to measure City's controllable file days. Process maps document the On-Off use of countdown clocks across all DAP application categories. AMANDA configuration eliminates circulations…City staff come to the data which is always up-to-date with latest submission version.*
Implement identified usability improvements and customizations to improve overall user experience of development mapping tool. Review the policies and procedures on the use of AMANDA to ensure the data is accurate, reliable, complete and timely. Provide typical information such as infrastructure, design drawings, floodplain mapping, etc.	• *Focus on modernized AMANDA configuration with processing time countdown clocks to measure City's controllable file days. Process maps document the On-Off use of countdown clocks across all DAP application categories. AMANDA configuration eliminates circulations…City staff come to the data which is always up-to-date with latest submission version.*
Modernize the existing application workflow and management system	• *Focus on modernized AMANDA configuration with processing time countdown clocks to measure City's controllable file days. Process maps document the On-Off use of countdown clocks across all DAP application categories. AMANDA configuration eliminates circulations…City staff come to the data which is always up-to-date with latest submission version.*
Review process of releasing securities to limit financial strain placed on developers and improve the efficiency of the process.	• *Detailed "As Should Be" process mapping of Post-construction Conditions Clearance/Securities release model. Countdown clock processing time targets included.*
Streamline the report writing process to reduce process inefficiencies and increase development review staff capacity.	• *Delegated authority expansion for Site Plan will eliminate effort-intensive report writing & free-up Planner capacity to deal with expected spike in applications*
Timeframes and subsequent accountability should be established for providing comments prior to the pre-consultation meeting.	• *Detailed "As Should Be" process mapping of Pre-Consultation model undertaken. Countdown clock processing time targets included. Process maps address staff meeting/comments prior to the scheduled Pre-consult mtg with applicant.*
Update the Site Alteration permit process and By-Law	• *As Should Be" process mapping for Post-Draft Plan Detailed Engineering Review requires a formal/modernized Early Servicing Agreement – replacing the less structured use of the Site Alteration by-law to initiate servicing.*

4.3 2021 DAP Review: Methodology Overview

The DAP Review & Technology Modernization project has been executed by Performance Concepts/Dillon according to an impartial evidence-based methodology developed across 20+ similar projects. The figure below provides an overview of the methodology.



4.3.1 Project Kick-off & Work Plan Refinement

The Project Kick-off was executed in two steps with i) a DAP Review Steering Committee and ii) members of the City's extended DAP staff team imbedded in multiple departments. The interactive Kick-off was used to confirm/refine the overall workplan and initiate an extensive data transfer to the Performance Concepts/Dillon team. The Kick-off also provided an upfront opportunity to gauge the City's appetite for DAP transformation by using the Mentimeter.com interactive polling tool to pose a series of probing questions about DAP performance. Staff responses to these questions were documented in real time by the Mentimeter.com tool and they are presented in the "As Is" section of this report.

4.3.2 Current State "As Is" Documentation

A series of interactive facilitated working sessions were held to document and evaluate the current performance of Planning/Engineering DAP around the following processes:

i. Pre-Consultation
ii. Application Intake to Deemed Complete
iii. Technical Review Cycles
iv. Application Approvals/Conditions
v. Post-construction Condition Clearance

These processes were documented and evaluated as they apply to the Subdivision, Post-Draft Plan Detailed Engineering Review, Site Plan, Re-zoning, and Committee of Adjustment development approvals channels.

The sessions also addressed the "who does what" roles and responsibilities of various City staff positions and business units across the organization.

4.3.3 DAP File Performance Audit

Following the "As Is" working sessions Performance Concepts/Dillion initiated a DAP file performance audit. A cross-section of high performing/poorly performing files were selected for review. These files extended across a range of Planning application categories: Sub-division, Site Plan, Minor Variances/Consents etc. The completed file audit generated a performance improvement memorandum that has informed the "As Should Be" Recommendations set out in this Report.

4.3.4 DAP "Best Practice" Case Studies

Performance Concepts/Dillon have conducted numerous DAP service delivery reviews and DAP fee modernization assignments across Ontario and Canada since 2006. Our team has developed case studies around DAP "Growth-Pays-for-Growth" cost recovery models, Application process streamlining, and Technology driven performance measurement/target setting toolkits.
These DAP case studies provide important context and have informed the "As Should Be" Findings/Recommendations package that has been prepared for Brantford. These case studies highlight DAP transformation challenges to be addressed and they can be viewed as potential shortcuts to secure significant performance improvement.

4.3.5 Future State "As Should Be" Documentation

A series of "As Should Be" interactive/facilitated working sessions were held with the City's core DAP staff teams from across the organization. These working sessions mirrored the earlier "As Is" sessions; evaluating core processes as they apply to Subdivision, Site Plan and Committee of Adjustment development approvals channels. The "As Should Be" working sessions also addressed the critically important post-Draft Plan detailed engineering review that culminates in a subdivision agreement and lot registration. The Detailed Engineering Review will figure prominently in the imminent development approvals of the Brant boundary lands. Beyond process improvement, the "AS Should Be" investigation also addressed revenue stream/cost recovery modernization and necessary staffing/resourcing investments.

4.3.6 AMANDA Configuration - Site Plan Proof of Concept

The City is committed to a two-stream approach for modernizing the AMANDA workflow tool. The first stream is a "proof of concept" configuration of the new "As Should Be" Site Plan process recommended by Performance Concepts/Dillon in the City's new AMANDA Planning module. Our team's AMANDA technical expert – Northern Design Lab – executed the Site Plan proof of concept configuration. The

second modernization stream is a go-forward Implementation Road Map for configuring additional "As Should Be" core DAP processes (beyond Site Plan) within the City's new AMANDA Planning module.

4.4 Findings/Recommendations + Go-Forward Implementation Roadmap

A portfolio of Findings/Recommendations has been developed to streamline/transform Brantford's current DAP model. This DAP performance improvement/transformation package includes LEAN inspired re-engineered processes, a restructured staffing and org-design model, a modernized DAP portal/workflow tool platform, and a set of go-forward Key Performance Indicators (KPIs) and application processing timeframe targets. Potential performance improvement ideas have been subjected to rigorous evidence-based evaluation by the Performance Concepts/Dillon team prior to being upgraded to "As Should Be" recommendations.

The "As Should Be" Recommendations developed by Performance Concepts/Dillon have been positioned within a *Do Now/Do Soon/Do Later* Implementation Roadmap. The Implementation Roadmap reflects the unavoidable imperative for rapid implementation of significant change. The Implementation Roadmap will chart out timely/significant progress over a very compressed timeframe - hopefully without overwhelming the finite capacity of Brantford to execute the necessary change. The imminent challenge of the Brant boundary lands on the DAP model leave no room for delay.

4.5 Final Report – Documenting DAP Transformation/Performance Improvements

Draft Recommendations and a rapid deployment Implementation Roadmap were stress tested with Brantford's project Steering Team. While the Performance Concepts/Dillon team's Final Report has been informed by this stress testing with City staff, the Findings/Recommendations and Implementation Roadmap represent our team's impartial 3rd party perspective - consistent with the requirements of the City's Audit and Accountability Fund agreement with the Ministry of Municipal Affairs and Housing.

5.0 Documenting the City's "AS IS" Development Approvals Model

5.1 Historic Application Volume Trends

The table below sets out the pattern of historic development approval applications in Brantford. The 2020 and 2021 (almost mid-year) are instructive. The 2020 subdivision applications will generate additional Detailed Engineering Review phases in 2022 – at precisely the time the Brant boundary land block plans are finalized, and applications begin flowing. The 2021 Pre-consult totals (at mid-year) are eye-popping. If this pace continues and they generate applications, then the City is facing a spike in applications independently of whatever happens with the Brant boundary lands. Site Plan activity continues to meet or perhaps exceed the totals for busy historic years.

DAP Volumes Trends & Forecast Observations

- 2020 Subdivisions (6) will generate additional Post-Draft Plan Detailed Eng. Reviews
- 2021 Pre-consult totals to date are eye-popping…if pace continues & they all generate applications…a flood is coming
- SP volumes on track for a busy year in 2021…mirroring 2018/2019
- Time horizon for more expected Sub-divisions set out in DC Background Study for Brant Boundary Lands

Development Applications (2007- 2021)

	2007	2008	2009	2010	2011*	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021 (as of August)
Official Plan Amendments	7	13	4	2	9	7	7	7	4	2	7	6	2	8	0
Zoning Bylaw Amendments	21	27	24	18	19	17	19	13	19	10	16	17	13	25	7
Plan of Subdivision	4	5	2	3	3	6	1	2	2	3	6	4	3	6	0
Plan of Condominium	11	5	1	3	1	1	3	0	2	1	3	3	3	1	2
Site Plans	54	32	35	28	21	34	36	23	24	34	33	46	47	34	32
Minor Variances	37	36	19	33	27	21	41	34	36	50	37	37	38	24	37
Consent to Sever	51	35	44	30	26	36	33	26	25	42	34	22	39	20	36
Relief from Part Lot Control	0	4	3	0	2	5	6	4	4	2	2	1	6	3	3
Pre-Consultations											82	66	84	54	64
Block Plans															3
Total	185	157	132	117	108	127	146	109	116	144	220	202	235	175	184

* Major Increase in Fees on May 1, 2011

5.2 Current DAP Fee Structures & Cost Recovery Model

Non-tax revenue streams yielded by DAP fees serve as the fuel that funds the necessary staffing muscle to properly execute development review processes. Modernized Planning/Engineering DAP fee structures contribute to a best practice "growth pays for growth" cost recovery model and an "enterprise" budgeting model with zero property tax impact - similar to the enterprise 100% cost recovery model found in most municipal Golden Horseshoe municipal Building departments.

5.2.1 Planning Fees & Cost Recovery Accounting/Budgeting

Section 69 of the Planning Act requires a municipality to develop cost recovery fees on a rigorous application-by-application basis. Planning fees can be appealed to the OLT/LPAT, and they must each fee must be designed according to rigorous cost recovery standards; no cross-subsidization is permitted across fees. For cost recovery transparency municipal budgeted costs of delivering DAP (wherever they are imbedded in the City's organization structure) should be linked to corresponding cost recovery revenue streams. The annual budget should firmly staple off-setting DAP revenues to DAP cost centres; thereby producing a visible net property tax levy requirement (or not) associated with DAP workflows. Indirect support functions like HR, Finance, Legal etc. that are consumed by frontline DAP staff teams should be offset by DAP fee revenues. Currently indirect support functions are allocated to Building DAP but not to Planning/Engineering DAP. Expanding the allocation to these areas will promote enterprise-style costing.

Brantford's current budgeting and cost accounting approach to Planning DAP does not appear to meet best practice standards around "growth pays for growth" enterprise management or *net expenditure* reporting consistent with Section 69 fees design requirements. Instead, Planning DAP revenues are accounted for "below the line" solely for purposes of calculating the City's net tax levy requirement. This approach to DAP revenue accounting discourages the City from viewing DAP as an enterprise business requiring minimal/transparent property tax funding support. Council in turn may be reluctant to staff the DAP model robustly if the City's revenue accounting model does not make it clear that there are no significant net tax impacts associated with DAP staffing investment.

There is no compelling rationale for treating Planning/Engineering DAP differently than Building DAP when it comes to cost recovery "enterprise" status. The same "growth pays for growth" rationale applies.

5.2.2 Engineering Review Fees & Cost Recovery Accounting/Budgeting

The City's Engineering Review fees are legally defined as Municipal Act fees. Municipal Act fees do not need to meet the exacting standards of cost recovery justification contained in Section 69 of the Planning Act. Engineering Review revenue streams do not need to balance annually against associated DAP processing costs. Engineering Review fees are not appealable to the OLT/LPAT.

5.2.3 Peer Review of DAP Fees (Design and Pricing)

A technically sound peer review of DAP fees can provide important insights around Brantford's preparedness to fund the necessary DAP staffing model that will be required when the City's traditional application volumes spike upwards due to the Brant boundary lands coming on-stream after block planning is completed.

Performance Concepts has executed the peer review analysis appearing below. Eight "like" City comparators were selected for analysis - four single-tier municipalities and four municipalities situated within 2-tier Regional systems. DAP fees in the 2-tier comparators have been aggregated to include the Region's fees as well as the City fees.

Fee design is diverse across the comparators. In order to execute an apples-to-apples analysis, a number of application scenarios were designed, and then each comparator's fees were applied against that scenario. The fee comparison application scenarios on the following page are as follows:

- 2 *Draft Plan of Subdivision* scenarios based on differing unit counts (100 or 200) or differing hectares (10 or 15)
- A Post-Draft Plan *Detailed Engineering Review* scenario where the value of constructed works being reviewed/approved is $1M
- A multi-residential Site Plan with 50 units/2 hectares
- A Non-residential Commercial Site Plan with 2,000 square metres of GFA
- A major Re-zoning for a 100-unit residential application
- A Standard Condo for a 50 unit/2-hectare residential project

Fee Comparators with Single-Tier and Two-Tier Peers

			Single-Tier Peers						Two-Tier Peers				
		Brantford	Peterborough	Brant	Hamilton	Kingston	Guelph	Average	St Catharines	Milton	Cambridge	Kitchener	Average
Subdivision		**$47,090**	**$6,450**	**$44,270**	**$81,769**	**$24,160**	**$38,437**	**$39,017**	$12,553	$81,581	$24,800	$10,965	**$32,475**
Units	**100**								$16,835	$10,608	$9,025	$9,025	
Hectares	**10**								**$29,388**	**$92,189**	**$30,025**	**$19,990**	$42,898
Subdivision		**$52,465**	**$6,675**	**$54,270**	**$103,369**	**$38,005**	**$38,437**	**$48,151**	$12,553	$92,381	$39,800	$11,915	**$39,162**
Units	**200**								$22,635	$10,608	$10,275	$10,275	
Hectares	**15**								**$35,188**	**$102,989**	**$31,275**	**$22,190**	$47,911
Sub-div Eng. Review		**$50,000**	**n/a**	**$60,000**	**$60,000**	**n/a hourly rate**	**$60,000**	**$60,000**	**n/a**	**$63,500**	**$50,000**	**n/a**	**$56,750**
Construction Value	**$ 1,000,000**												
Res Site Plan		**$12,770**	**$3,000**	**$8,000**	**$56,707**	**$11,033**	**$10,848**	**$17,918**	$7,435	$10,185	$13,460	$9,641	**$10,180**
Units	**50**								$1,315	$1,162	$805	$805	
Hectares	**2**								**$8,750**	**$11,347**	**$14,265**	**$10,446**	$11,202
Commercial Site Plan		**$12,770**	**$2,700**	**$8,000**	**$40,437**	**$8,105**	**$10,668**	**$13,982**	$7,435	$10,167	$13,460	$8,861	**$9,981**
Square Meters	**2,000.00**								$1,315	$1,162	$805	$805	
									$8,750	**$11,329**	**$14,265**	**$9,666**	$11,003
Major Re-zoning		**$14,490**	**$6,000**	**$25,000**	**$24,109**	**$7,591**	**$17,031**	**$15,946**	$10,000	$37,856	$13,000	$11,618	**$18,119**
Units	**100**								$1,315	$1,028	$1,150	$1,150	
									$11,315	**$38,884**	**$14,150**	**$12,768**	$19,279
Standard Condo		**$38,310**	**$6,090 (2 ha)**	**$39,270**	**$21,750**	**$11,160**	**$10,264**	**$17,707**	$6,974	$13,020	$6,600	$7,640	**$8,558**
Units	**50**								$3,930	$3,065	$6,150	$6,150	
Hectares	**2**								**$10,904**	**$16,085**	**$12,750**	**$13,790**	$13,382

The Peers analysis reveals the following growth-pays-for-growth Observations/Findings:

- Brantford's Draft Plan of Subdivision revenue stream is robust. The City is well positioned to generate a cost-recovery revenue stream that minimizes the risk of unintended property tax subsidization of imminent development on the Brant boundary lands.

- Brantford's *% of Construction Value* fee for Engineering DAP cost recovery can be adjusted from 5% to 6% to reflect peer norms. The resulting improved revenue stream will generate an estimated $20M in additional revenues (over 10 year) to fund staffing investments required to deal with the Brant boundary lands. These staffing investments should have no property tax impact.

- Brantford's current fee design/pricing for Site Plans is generating sub-par revenue streams compared to the averages for single-tier and two-tier comparators. Many of the peers have designed their Site Plan fee to consist of a base fee ($) plus a per unit/per hectare escalator ($). This fee design results in larger/complex projects paying a higher fee relative to smaller/straightforward projects. Brantford currently does not attach a per unit/per hectare escalator to its Site Plan base fee.

- Brantford's Re-zoning fee hovers around the single-tier peers' average but is significantly lower than the Milton fee that capitalizes on a best practice design of base fee ($) + per unit escalator ($). The Milton fee design aligns a higher fee price with larger more complex projects featuring high numbers of residential units.

- Brantford's Condo fee is robust and high relative to the peers. The variance in fee pricing is driven by aggressive cost recovery by Development Engineering's via its companion fee to Planning's fee. This approach is prudent given the reality in Brantford of significant engineering work being incorporated into the Condo review process in order to safeguard the interests of the new divided ownership (in cases where Site Plan reviews may not have been completed yet for the project).

The "As Should Be" component of this Report will address DAP fee modernization opportunities.

5.4 AMANDA Workflow Technology Tool

AMANDA was originally designed as a permitting software solution. As is the case in most Ontario municipalities using AMANDA, Building Services were the early adopters in Brantford. Changes to the Building Code Act is 2005 required municipalities to deliver permit decisions according to legislated timeframes. CBOs across Ontario used AMANDA to generate timeframe reporting by timestamping key processing milestones from application intake to the Building Permit decision.

Since 2005 City staff have intermittently attempted to commit to AMANDA as a Planning DAP workflow tool. To date these efforts have been unsuccessful. Staff from various City business units involved in Planning DAP do not populate the current AMANDA 7 permits module, nor have they been trained to do so (e.g., Development Engineering). To the extent City Planners use AMANDA at all, the full functionality of the tool is not being utilized. Application processing milestones are not being tracked or reported. While the City has tried to set processing timeframe targets, it is not able to compare actual timeframes against these targets. A significant amount of DAP work is executed by Planners and stored outside of AMANDA in "black box" data sets/applications. The failure to employ AMANDA as a Planning DAP workflow "central nervous system" predates the current Planning management team and many of the frontline staff. There is a strong consensus across the current DAP staff team that "As Should Be" streamlined processes should be managed/tracked using AMANDA. The City has recently purchased the AMANDA 7 Planning Approvals module and its supporting Conditions Clearance module.

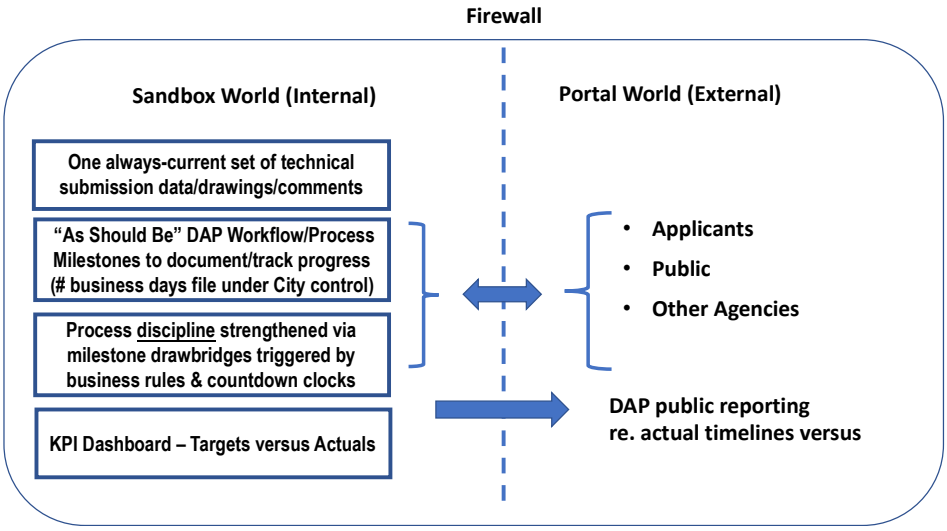
The figure below illustrates the DAP workflow functionality that can be delivered by AMANDA working in combination with an online DAP portal. The AMANDA sandbox will ensure DAP submission packages/documents/drawings are always updated across Technical Review Cycles. Process milestones can be tracked/time stamped, based on controllable file days. File progress across application milestones can be sequenced/coordinated using checkmark "drawbridges" built into AMANDA.

Performance reporting/report cards can be built into AMANDA using countdown clock functionality.

A DAP online portal will provide "read" access into AMANDA to allow the public, applicants, and external agencies to track progress of individual files and/or compare processing timeframes across a pool of files in a particular Planning application category.

The Performance Concepts/Dillon team is familiar with functionality capabilities built into AMANDA. While not endorsing AMANDA (or any other workflow tool) as a best practice solution, our team can confirm that AMANDA can be configured to act as an effective Planning/Engineering DAP workflow tool.

AMANDA Solution Must Leverage *Execution + Accountability*



5.5 Council Governance and Limited Delegation of Approvals

Currently Council makes DAP decisions using two distinct Committee of the Whole governance channels for Development Services (planning matters) and Public Works (development engineering matters). These COW channels are based on org structure. They create artificial DAP governance silos where some aspects of the same subdivision are dealt with in the Development COW and others in the Public Works COW. Both COW channels are increasingly busy with DAP matters. The Development COW is grappling with the effort intensive/open-ended public consultation associated with Planning statutory public meetings.

To its credit Council is already making effective/efficient use of delegated authority to senior staff for a variety of Planning approvals – most notably Site Plan Control. By trading control for results Council has lopped months of the processing timeframes for Site Plans. Public input on pertinent land use matters associated with projects moving through Site Plan are dealt with in the Re-zoning "combo pack" applications. The Re-zoning statutory public meeting can occasionally supply useful public input on Site Plan matters pertaining to controversial development proposals.

Staff are of the view that expanded Council approval delegation across a range of DAP approvals is necessary to meet imminent workload/processing time challenges. To that end a City staff report has been prepared to justify expanded delegation of approvals. The Performance Concepts/Dillon team as reviewed the City staff report and produced an interim findings memorandum supporting the expanded delegation recommendations made by City Planning staff. The interim findings memo is appended to this Report as an attachment.

AS IS…DAP Delegated Approvals

City Believe Delegated Approvals Efficiencies Are Still Available

AS IS Process Highlights

- ✓ City has already adopted aggressive Site Plan delegation
  - ✓ Eroded by Re-zoning public consultation veering into Site detail?
- ✓ Other delegation opportunities exist around agreement execution/condition clearances/H removal etc.
- ✓ Upcoming staff report to expand delegation efficiencies is crucial…it's the $ cheapest approach for improved DAP timelines
  - ✓ Interim P. Concepts Finding on the benefits of the proposed delegation expansion opportunities can be imbedded in the City staff report…thereby demonstrating coordinated approach to improvement between staff and the P. Concepts team
- ✓ Overarching Question: Is Council prepared to trade control for results?

5.6 Current Organization Design & Staffing Resources

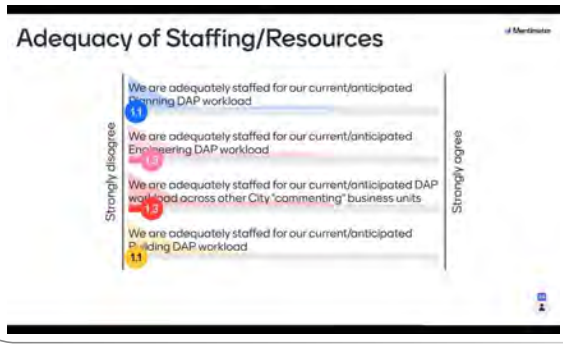
The City currently executes DAP using a distributed organization design model. Development Planning, Policy Planning, Building, and IT are clustered together in the People, Legislated Services & Planning department. Development Engineering is imbedded in Public Works, along with the Water Capital/Operations team that consistently comments on all significant development applications. Development Engineering has now in-sourced previous Public Works positions that deal with traffic, parks, and landscaping matters. Aside from water infrastructure matters that are clearly connected to Safe Drinking Water regulatory standards, the Development Engineering business unit is quickly evolving towards a one-stop-shop accountability model for DAP infrastructure and servicing matters.

The City's frontline DAP staff team members are unanimous across all disciplines/roles in concluding they are under-resourced and/or sub-optimally deployed to meet the workload for the existing volume of applications within the current urban boundary + the imminent volumes to be generated by Brant boundary lands.

Specific staffing bottleneck risks have been identified. In the current staffing/deployment model the City relies on single staff positions for a number of mission-critical DAP processes/activities (e.g., mapping to support applications). Professional Planning staff are engaged in lower value-added activities that are best executed by non-Planner logistics specialists (e.g., Committee of Adjustment administration). Finally, as is almost always the case in DAP reviews executed by Performance Concepts/Dillon, Development Engineering functions/workload represent a high-risk resourcing pain point. Each Subdivision Draft Plan approval by the City typically generates more than one backend phase of Detailed Engineering Review culminating in a subdivision agreement and a cluster of registered lots. This "volumes multiplier" at the back end of the Subdivision process requires a robust staffing commitment of technically proficient engineering professionals. These skilled staff are in high demand across Golden Horseshoe municipalities and the development industry. Planners simply cannot do this work – it takes accredited Engineers and Eng. Techs to keep DAP moving in the core Site Plan and Subdivision approvals channels.

AS IS…DAP Staffing Resources

City Staff Strongly Believe DAP is Under-Resourced



AS IS Process Highlights

- ✓ City relies on single positions for critical DAP functions
- ✓ Staff roles not yet fully optimized (C of A) for high value-added DAP billable hours
- ✓ Dev Eng. Staffing not yet scaled for the Detailed Eng. Review "volumes multiplier"
- ✓ Unclear what the City's actual "billable hour processing capacity" is for front-end Planning/Eng. DAP…due to shared non-DAP + DAP workload among Planners/Dev Eng. staff/other business units

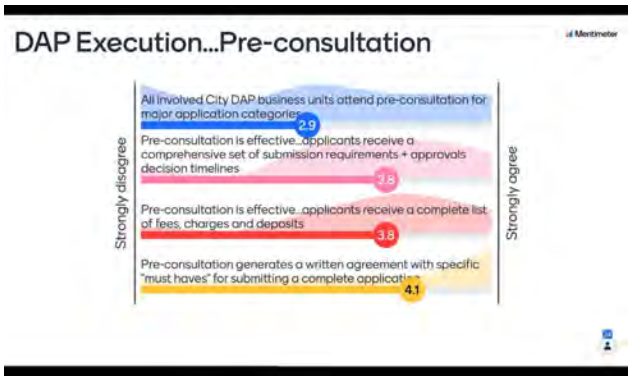
5.7 Pre-consultation Model

Well executed Pre-consultation is a determinant of an efficient, standardized DAP conveyor belt. Brantford's pre-consultation model contains the characteristics/elements of an effective "best practice" approach. Submission requirements are clear and sufficiently granular. Pre-consult meetings with the applicant are pre-scheduled for each month's Development Review Committee sessions - with backed-up submission deadlines that create space and time for staff to prepare. There is a "pre pre-consult" staff only working session to generate consensus on the technical requirements of the proposed project. Following the pre-consult meeting the technical submission checklist is produced and delivered to the applicant according to a 10 business days service level standard.

The only problematic feature of the pre-consult process is the effort intensive, manual nature of consolidating post-meeting data/comments in the Pre-consult template by the Planner. If the AMANDA workflow tool were properly utilized, this work would be streamlined by staff each entering commentary directly into a fillable PDF template already imbedded in AMANDA.

AS IS...Pre-Consultation

City Staff Believe Pre-Consult is Working



AS IS Process Highlights

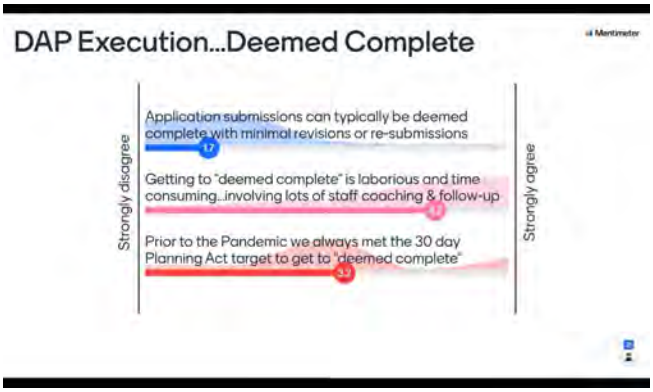
- ✓ Clear Pre-Consult application & submission requirements
- ✓ Pre-scheduled dates for Pre-Consult meetings create predictability
- ✓ City internal prep/review session prior to the scheduled Pre-Consult meeting (on a critical path timeline)
- ✓ Inefficient 2-step assembly of staff comments into Pre-consult template (eats up Planner time/capacity)
- ✓ Post-meeting Notes/complete application checklist always generated (a focused/practical deliverable
- ✓ Reasonably timely provision of notes/submission checklist items to applicant (10 business day service level)

5.8 Application Submission to Deemed Complete

The submission of a Planning DAP application turns on a 30-day countdown clock in the Planning Act to deem the application complete.

AS IS…Application Submission to Deemed Complete

City Staff Believe Getting to Deemed Complete is Problematic



AS IS Process Highlights

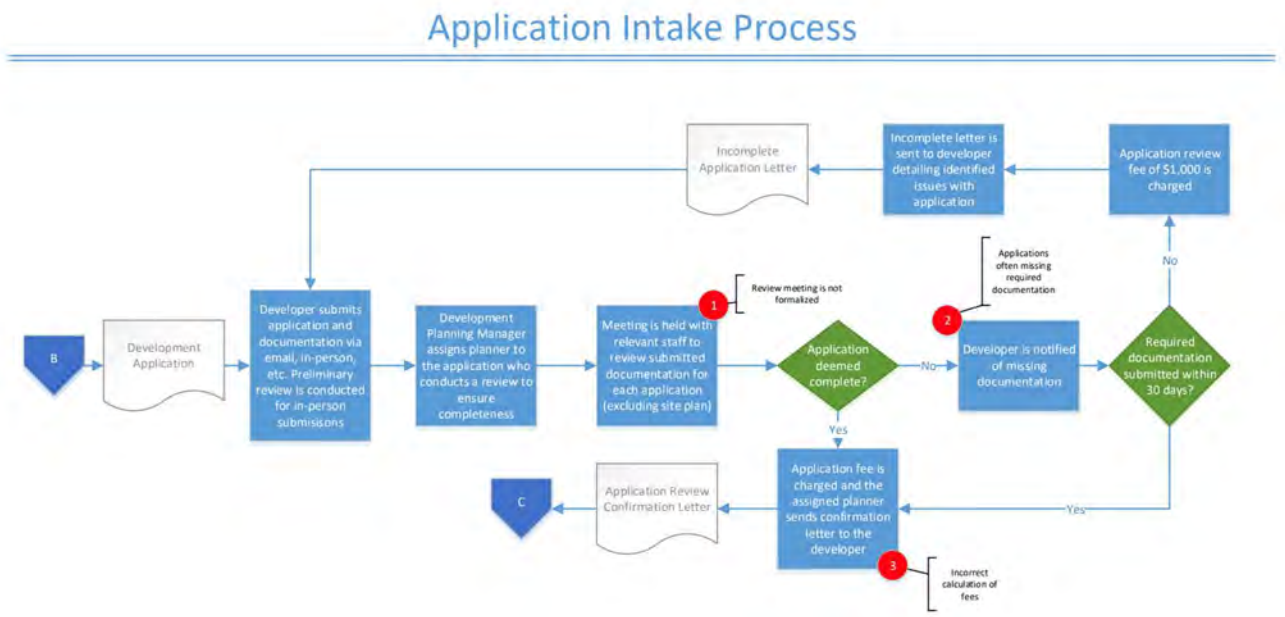
- ✓ City currently relies on a Site Plan/C of A application submission "pieces count" rather than a "shallow dive" QA evaluation of content prior to the "Deemed Complete" decision
- ✓ Subdivision Draft Plan & Re-zoning where a "shallow dive" QA content evaluation is built into the critical path before arriving at a "Deemed Complete" decision…need to formalize/normalize this milestone & imbed in AMANDA
- ✓ Currently no formalized Pre-consult or "Deemed Complete" process milestone for the post-Draft Plan Detailed Engineering Reviews

There are a number of approaches employed by municipalities to ascertain application completeness. The most straightforward approach is a piece count. Upon observation, do the submission pieces appear to mirror the items on the technical checklist that was assembled at the conclusion of the pre-consult? Are there obvious gaps/missing pieces? If yes, then the submission is conspicuously incomplete, and the Planning Act countdown clock turns off.

The Performance Concepts/Dillon team notes with approval that Brantford also employs a second completeness check that involves a "shallow dive" review of submission content adequacy (see figure below). A staff meeting is held to review submitted documentation using an adequacy lens. Simply submitting a document with the right piece title and some sort of content is not enough to secure a "deemed complete" designation. The City staff team gives a thumbs up/thumbs down on the question "Is this submission good enough for the deeper dive associated with the 1st Technical Review Cycle that will transpire with the OLT appeal clock turned on".

The ROI generated by the shallow dive completeness step is significant. It constitutes a municipal best practice. An improved submission quality standard for deeming an application complete reduced the length and number of subsequent Technical Review Cycles. This in turn reduces the overall timeframes for a municipal development approval decision. Upfront pain generates downstream gain.

A noteworthy point - because the Planning Act does not require a "deemed complete" 30-day decision for Site Plans, the City does not currently use the 2-step piece count + shallow dive approach it employs for Sub-divisions, Condos and Re-zonings.



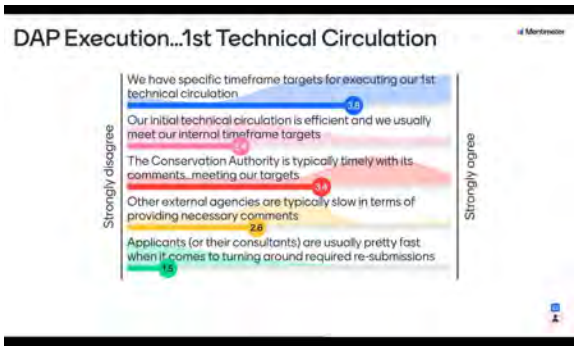
5.9 Technical Review Cycles

The City has aspirational timeframe targets for executing Technical Review Cycles. However, these targets are disconnected from actual timeframe completion because the AMANDA workflow tool is not properly configured/utilized to generate timeframe reporting. In other words, actual measured processing performance is not tied to targeted/desired timeframe performance standards. This is a significant shortcoming that pre-dates the current DAP management team(s) on both the Planning and the Development Engineering sides of Brantford DAP.

The current 4-week circulation timeframe target is applied across all of the core application categories (Site Plan, Subdivision, Re-zoning) without recognition of complexity differences, or the deeper due diligence review required for infrastructure intensive files like Subdivisions. Site Plan technical review is complicated by the absence of the "shallow dive" quality control step prior to the 1st circulation. Although not supported by processing time metrics/data, staff report that there is frequent slippage of actual timeframes versus the aspirational 4-week/20 business days standard (see the 2.4 negative score for the second City staff survey question in the figure below)

AS IS…1st Technical Circulation

City Staff Believe 1st Technical Circulation is Problematic



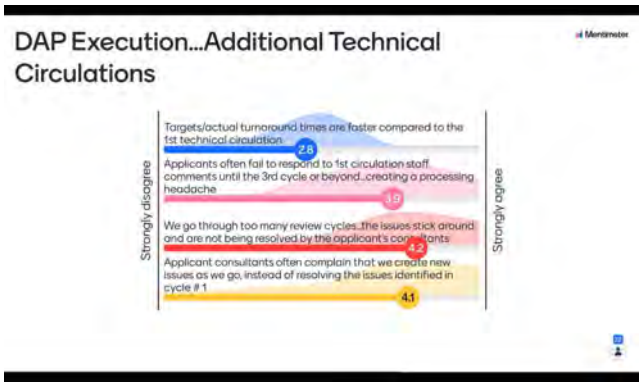
AS IS Process Highlights

- ✓ City timeframe targets disconnected from actual timeframe completion…data/measurement gap
- ✓ Applicant response problems…work leakage across multiple circulation cycles
- ✓ City response problems…work leakage across multiple circulation cycles
- ✓ Absence of "shallow dive" QA content review before Deemed Complete is linked to 1st Circulation problems
- ✓ Real-world timeframe measurement would probably confirm slippage versus timeframe target
- ✓ 1st Circulation timeframe target of 4 weeks feels very compressed versus Ontario growth municipality peers…would a longer timeframe reduce comment leakage to subsequent cycles?

Beyond the 1st Technical Review Cycle there are significant process execution challenges in the subsequent Technical Review Cycles. Firstly, the target timeframes are not differentiated between the 1st cycle and subsequent cycles. The timeframe target for a 1st Review Cycle should be longer, reflecting the complexity/totality of all the technical submission items requiring comment/review. Secondly, submission items/comments are not tracked numerically nor are they addressed by applicants using a comment resolution matrix. Finally, different Planners employ different approaches to i) consolidating comments in a single package for response by applicants versus ii) feeding comments back to applicants in dribs and drabs as they are received. Standardization is lacking and consolidation is manual/effort intensive since it is done outside AMANDA by Planners using an old school cut and paste approach.

AS IS…Additional Technical Circulations

City Staff Believe Technical Circulation Ping Pong Not Working

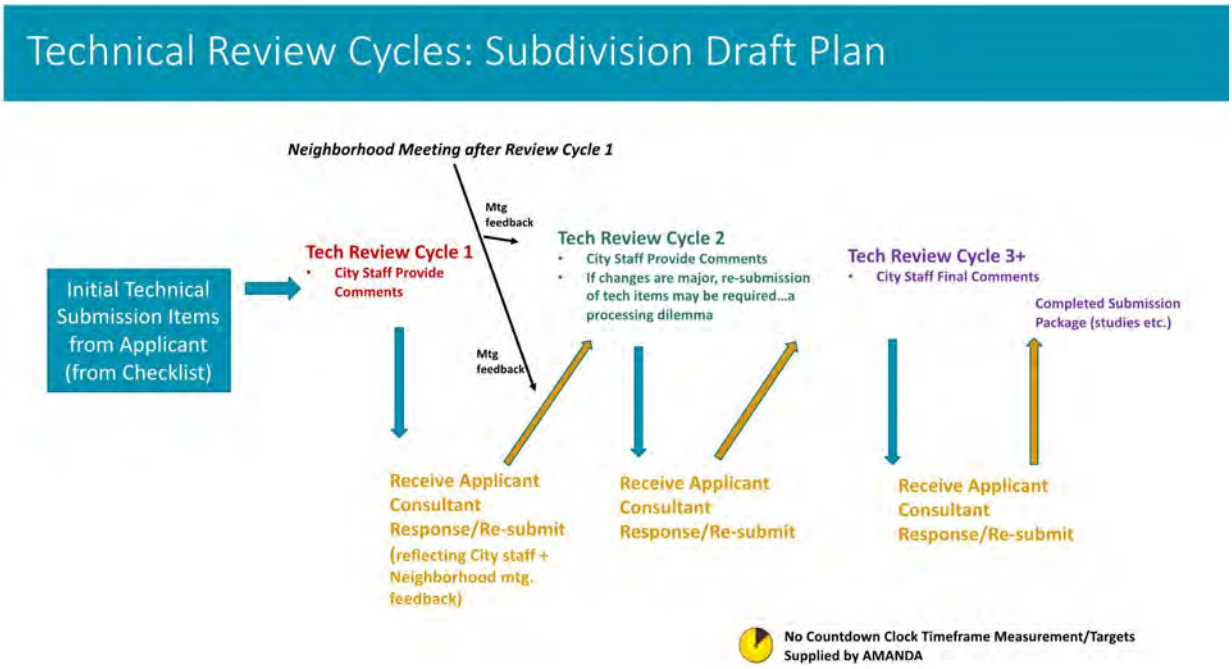


AS IS Process Highlights

- ✓ City timeframe targets not differentiated compared to 1st Circulation
- ✓ Applicant response problems driven by absence of comments matrix…perhaps code comments numerically & track them?
- ✓ City response problems due to resourcing choke points
  - ✓ 1 Planning Tech does all DAP mapping
  - ✓ Automation deficiencies in Planners managing numerous comments in/out
  - ✓ Differing approaches to sharing comments…dribs and drabs versus consolidated-but-slow

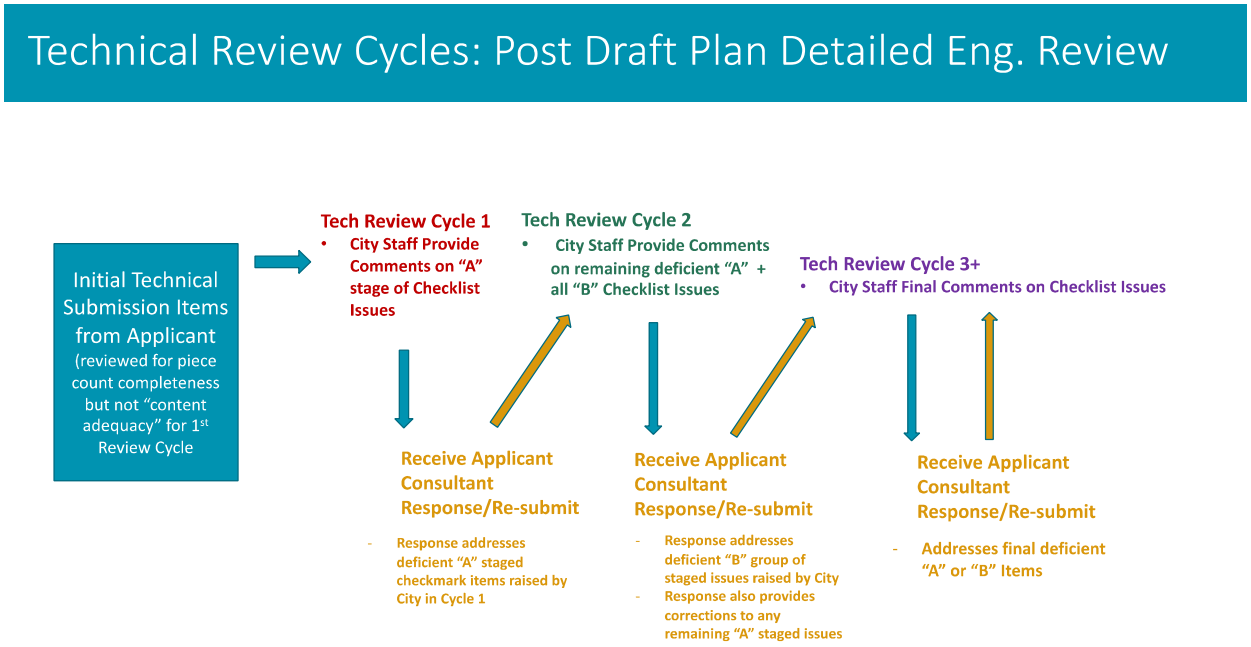
5.10 Draft Plan of Subdivision Processing Channel

The overall process for Subdivision approvals is set out in the figure below. As already discussed, the City is administering a well-executed process to deem an application complete. The 1st Technical Review Cycle deals with all the submitted technical checklist items so its countdown clock timeframe is longer at an estimated duration of 35 days (exceeding the 4-week target). Between Review Cycles 1 and 2 the applicant typically holds the Neighbourhood Meeting. If public feedback at the Neighbourhood Meeting is negative around the proposal, that feedback will inform the applicants second Review Cycle submission as well as the City's response to that same submission. If the 2nd Cycle applicant proposal is significantly different (to try and address negative public feedback) the City faces a processing dilemma. Does the City force the applicant back to the Pre-consult drawing board or proceed into a new project without established parameters? The "As Should Be" section of this report will address this specific dilemma which assumes inflated importance across the Brant boundary lands.

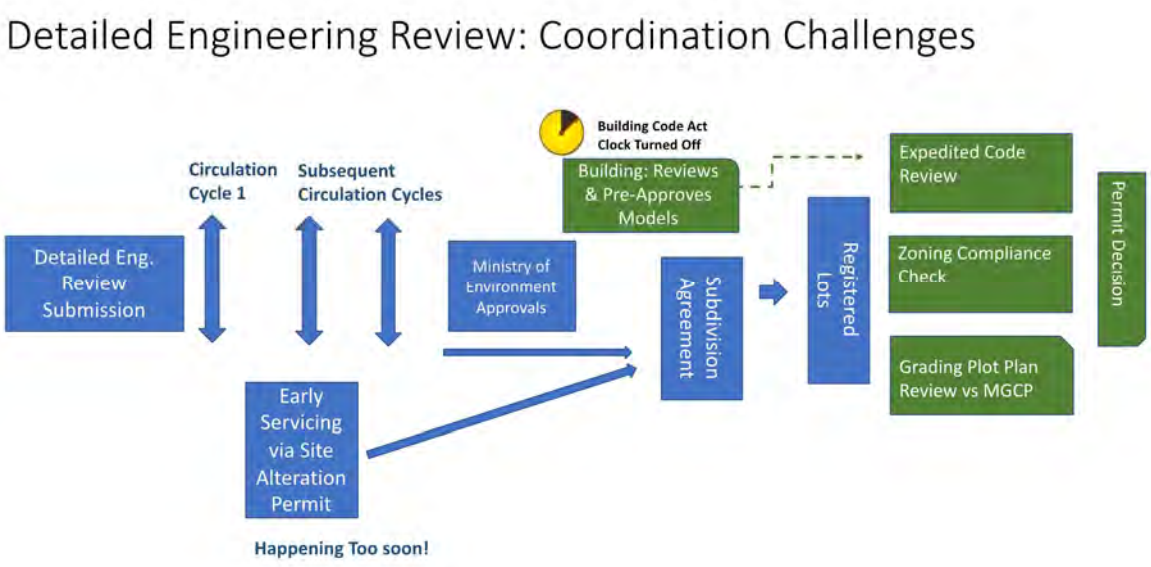


5.11 Post-Draft Plan Detailed Engineering Review

Brantford currently does not administer the Post-Draft Plan Detailed Engineering Review like a Planning Act application – for instance a Site Plan or a Re-Zoning. There is no Pre-consult process to document a technical checklist of mandatory submission requirements. There is no "shallow dive" to evaluate the quality/adequacy of a technical submission package prior to the 1st Technical Review Cycle. Submission items for review are unofficially triaged into "A" and "B" groupings and then staged over the first two cycles (see figure below). No measurement friendly countdown clock timeframes are tracked in AMANDA reports because Development Engineering staff do not currently track any of their workflow in AMANDA.



Each Detailed Engineering Review phase culminates in the production of a Subdivision legal agreement and registration of a portion of Draft Plan created lots (see figure below). The City's Site Alteration permit is currently used to trigger earth movement by the applicant. The Site Alteration Permit also triggers underground early servicing work, albeit in a less rigorous legal arrangement than the Early Servicing Agreements common to Golden Horseshoe greenfield growth municipalities. Brantford is experiencing underground servicing coordination challenges where the Site Alteration permit is being secured before the Detailed Engineering Review 3rd Cycle has been initiated. In addition, Ministry of Environment delegated approvals have not yet been initiated or secured. The "As Should Be" section of this Report will address the need for improved coordination and sequencing of these matters.



5.12 Site Plan Processing Channel

Brantford executes a well-designed/properly documented Site Plan Control model supported by a detailed reference manual (see figure below extracted from the City Site Plan manual). The cross-disciplinary Development Review Committee facilitates staff execution of the Pre-consultation and Technical Review Cycle components of the Site Plan model. Timeframe targets inform each major step in the overall 9-step Site Plan process, although the absence of timeframe tracking in AMANDA creates uncertainty around actual processing timeframes versus targets. Application submissions are screened for completeness using a "piece count" approach combined with an occasional "as time permits" content adequacy review (depending on the file Planner's workload burden and available capacity).

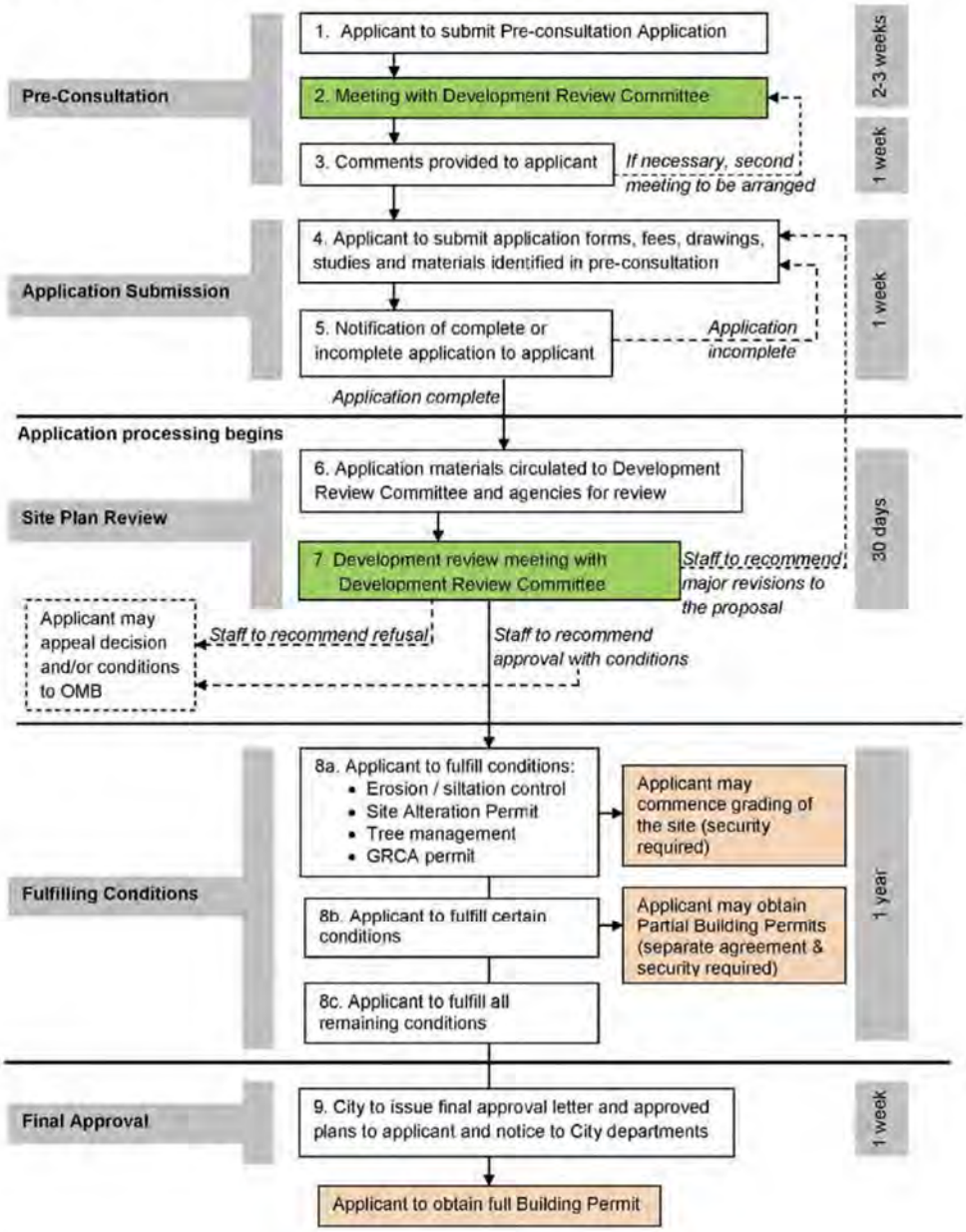
A Conditional Approval is granted early in the process, with conditions for Final Approval attached as required. Approval authority delegated by Council saves approximately two months per file that would otherwise be required to prepare an approval report to COW. The file Planner's time saved via delegated approvals is redeployed to keep other DAP files moving across the City's busy DAP conveyor belt. Re-zoning "combo pack" files (linked to the Site Plan) allow for a thorough vetting of land use issues and public consultation via a statutory public meeting – allowing Site Plans to be expeditiously processed according to technical criteria. Re-zonings are ideally sequenced in advance of Site Plans since land use/zoning conformity will be required for Site Plan conditions to be cleared.

Site Plan Final Approval requires standard conditions imbedded in an executed Agreement to be fulfilled within a year of the Conditional approval granted by the City (Step 8a-8c). Final Site Plan approval (Step 9) can trigger the issuance of a full Building Permit that generated by its own overlapping application/review process initiated in the latter stages of the Site Plan process. Conditional below-grade Building permits may be issued before Site Plan completion at the discretion of the CBO.

2.0 APPLICATION PROCESS

2.1 Site Plan Application Process

The site plan application process is illustrated in the flowchart below:



5.13 Re-zoning & Condo "Combo Packs" of Applications

The Re-zoning Pre-consult-to-Application Intake-to-Deemed Complete process is the same as Subdivision Draft Plan. Brantford's shallow dive QA content review prior to the Deemed Complete decision improves the quality/workability of the 1st Technical Review Cycle. Upfront effort on quality control yields downstream effort savings and fewer required ping-pong back-and-forth interactions with applicants during the Technical Review stage of processing.

There are staging/sequencing challenges with Re-Zoning and Condo applications that are anchored to a core Site Plan file. Applicants make a risk management decision on the timing of the Site Plan application relative to the Re-Zoning application. Concurrent applications are relatively high risk. A Site Plan submission that is sequenced near/at the end of a Re-zoning process is far less risky, since it is prudent for an applicant to resolve land use/zoning compliance matters first before incurring the expense of securing detailed Site Plan design and paying Site Plan application fees.

Brantford's Condominium approvals process deals with "Site Plan-ish" technical engineering matters during overlapping timeframes with an active Site Plan application. A condominium corporation's divided ownership has interests may need to be protected around servicing/landscape related Agreement conditions - matters that are linked to the Engineer's Report. Timing may dictate safeguards around these matters may need to be put in place before Site Plan review has addressed these same issues. In short, a back-and-forth toggle between the Condo and Site Plan applications in a "combo pack" process can present logistics and interrelated timing challenges.

City staff can advise applicants on the sequencing/staging options when it comes to Re-zoning and Condo applications anchored to a Site Plan, but the final risk management decision rests with the applicant.

5.14 Committee of Adjustment Processing Channel

The Committee of Adjustment (C of A) processes Minor Variance and Consent applications according to a standardized monthly processing cycle with time-sensitive workflow processes. The C of A model features the following characteristics:

- Limited margin for error re. processing timeframes
- Variability of applications volumes across each monthly cycle
- Thorough/deep City staff reports for each file/application

Staff report excellent alignment between Committee decisions and City Planners' report recommendations, with estimated convergence/agreement across 9/10 files.

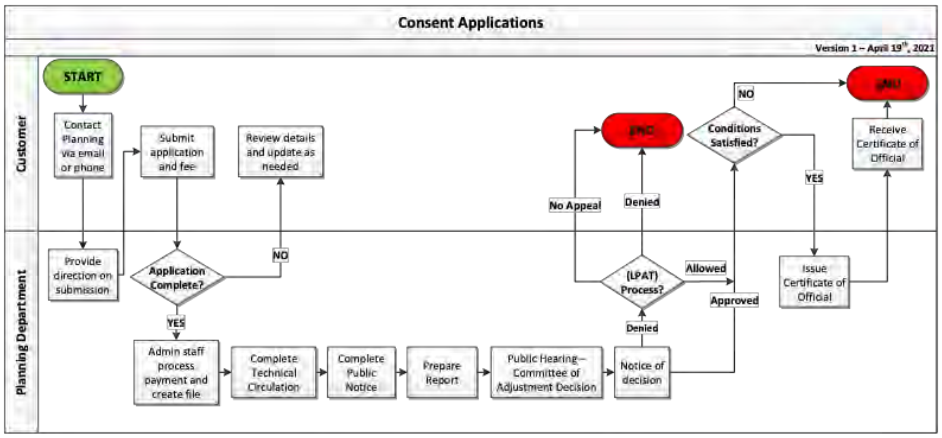
In some cases where applicants attempt to use the Minor Variance process as a workaround to avoid more complex/expensive Re-zoning applications, the Committee and City staff have exercised vigilance to protect integrity of the Re-zoning process.

Overlapping of the monthly C of A report deadline with competing deadlines for other DAP files can cause workload spikes/choke points for Planning and Development Engineering staff. Open-ended C of A agendas (without caps on the number of files per meeting) can exacerbate these workload spikes/chokepoints. The absence of a C of A meeting in June each year can escalate application volumes in the May/July cycles, creating additional process execution risk/stresses across the narrow 19-day window for executing an entire Committee cycle.

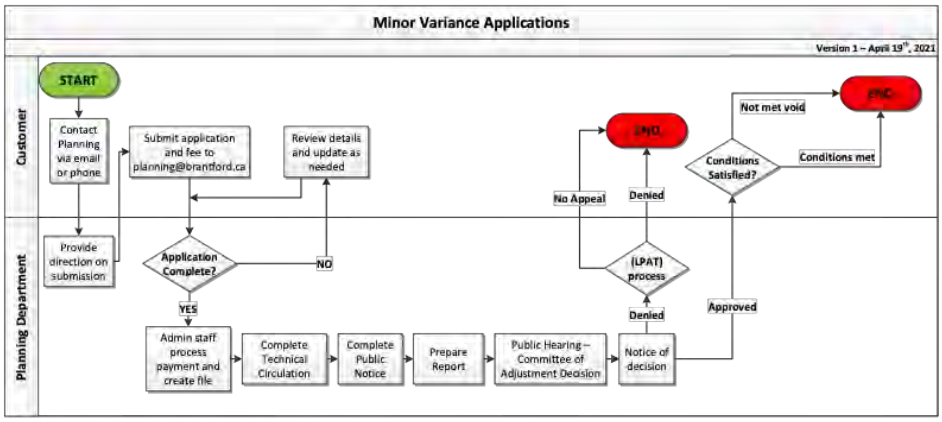
Currently two City Planners with finite billable hours to process DAP files are providing admin/logistical support to the Committee – a role typically filled by Admin or Planning Tech personnel in most municipalities. There is a measurable opportunity cost (lost Planner billable hours for other DAP files) consumed by these administrative/logistics functions. The opportunity cost equates to .5 of an FTE.

The C of A processes is not integrated into AMANDA. AMANDA workflow efficiencies represent a significant improvement opportunity moving forward.

C of A – Consent Process Map



C of A – Minor Variance Process Map



5.15 Small Scale Residential Infill Development

The City currently uses a simplified Site Plan process to review/approve certain categories of small residential tear-down/re-build infill projects. A reduced Site plan fee is applicable.

There is no industry-standard approach across Ontario municipalities for dealing with complex/potentially contentious infill residential projects featuring low unit counts on already-created lots. Some municipalities use a streamlined Site Plan model like Brantford. Others use Zoning/Grading Clearance permits instead of relying on Site Plan approval. It should be noted that Site Plan Control does not legally require public consultation in the case of infill teardown/re-build projects that may be occurring on legally created lots in established neighbourhoods.

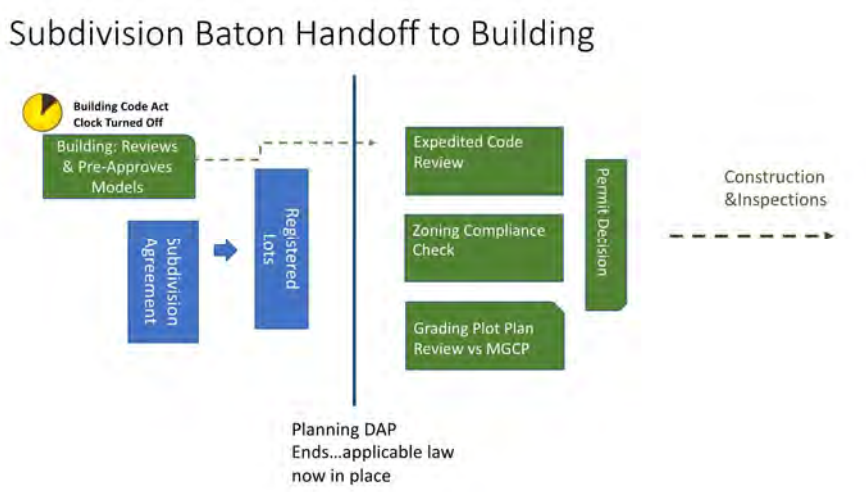
City staff are continuously working to improve the in-fill Site Plan process. Staff are using the new zoning bylaw to investigate whether issues around compatibility and site design/plan layout can be addressed without the need for a formal Site Plan process.

5.16 Planning/Engineering DAP "Baton Handoff" to Building DAP

Modernized DAP processes feature an overlapping baton-handoff from Planning/Engineering DAP (governed by the Planning Act) to Building DAP (governed by the Building Code Act). Well calibrated processing overlap provides applicants with a shorter overall DAP journey without compromising the effectiveness of the entire DAP model in securing regulatory compliance and high-quality development.

Brantford executes an efficient "industry standard" baton handoff within the Subdivision generated approvals channel. During the late stages of the Detailed Engineering Review, Building Services execute an advanced pre-approval of various house models that will be put forward in complete Building Permit applications following lot registration. Pre-approval significantly reduces Building Services' review workload when complete applications are put forward. The advance review requires applicants to acknowledge the Building Code Act's 10-day countdown clock for a permit decision has been turned off. The countdown clock turnoff is important to the City since processing a large number of simultaneous applications with the clock on would be problematic. This overlapping baton handoff is an effective workaround to turn off the 10-day countdown clock deadline imbedded in the Building Code Act. If this workaround was not adopted, Building Services would need significant staffing increases to comply with "clock on" timeframes. The pre-approved model's workaround is an industry standard municipal sector practice.

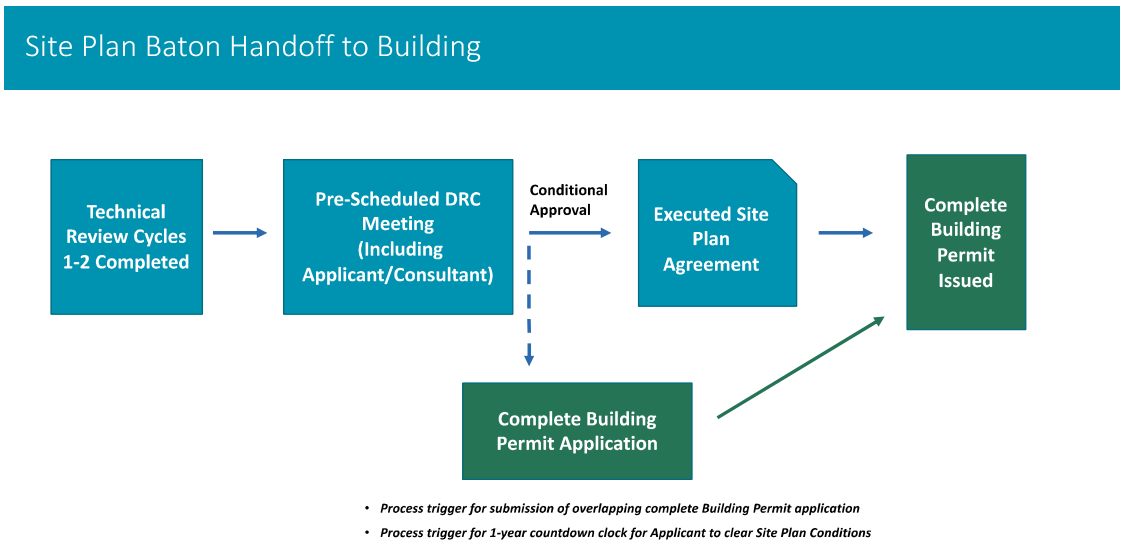
Once a complete Building Permit application can be considered after lot registration, an expedited Building Services review takes place. This review is focussed on a quick zoning compliance check, the plot plan grading review for each lot conducted by Development Engineering, and an expedited Code compliance review that confirms the already existing Code review that was executed prior to lot registration.



Brantford executes an efficient "industry standard" baton handoff within the Site Plan generated approvals channel (see figure below). Planning and Building staff coordinate the baton handoff based on case-by-case progress of the Site Plan. Since the DAP team is not using AMANDA to track process milestones, the baton handoff is not triggered by a specific point of progress. But in most cases the baton handoff follows the delegated Conditional Approval of the Site Plan by Planning staff.

The complete Building Permit application submitted prior to execution of the Site Plan agreement turns of the Building Code Act countdown clock. During the preparation of the Site Plan development agreement the plans examination of the Building Permit application is executed. Following execution of the development agreement the complete Building Permit can be issued on a just-in-time basis.

The combination of delegated Site Plan approval to staff plus an overlapping baton handoff for a Building permit application secures a significant overall reduction in the pathway to a Building permit and subsequent construction.



5.17 Measuring DAP Performance & Setting Targets

AMANDA milestone tracking/timestamping is the key to developing and implementing Key Performance Indicators (KPIs). The City already sets "soft" timeframe targets for core application categories, without tracking actual timeframes in AMANDA to verify actual processing performance times against desired performance times. The same situation exists in Development Engineering, soft targets with no tracking of timeframe actuals.

City staff across Planning and Development Engineering are committed to developing KPIs in a coordinated rollout of the AMANDA workflow tool for Planning/Engineering DAP. Timeframe targets will reflect new "As Should Be" application review processes and will be informed by countdown clock tracking of actuals after the fully configured AMANDA 7 Planning Module rollout in 2022.

The "As Should Be" section of this report will propose a best practices performance measurement/results management model for DAP.

6.0 DAP "Best Practices" Scan - Case Studies

6.1 Case Study: Adopting a "Growth Pays for Growth" DAP Cost Recovery Model

DAP staffing models across Ontario suffer from chronic under-resourcing. Development Engineering teams are especially prone to under staffing. Municipal staffing models do not reflect the fact that Draft Plan of Subdivision application volumes generate multiple Detailed Engineering Review phases per Draft Plan - a volumes multiplier workload challenge. As well the Province has compressed "no municipal decision" timeframe triggers for applicants to appeal to the OLT/LPAT. Finally, infrastructure design issues and built form innovations requiring resolution through DAP are growing more complex over time. Staffing shortfalls can cause systemic processing timeframe failures, which in turn can prompt developers to pursue "planning by LPAT" as opposed to working collaboratively with municipalities.

Modern DAP revenue streams are required to fund the badly needed DAP staffing investments and IT workflow tools that can secure reasonable/predictable processing timeframes. These "growth pays for growth" revenue streams can reduce/eliminate property tax subsidization from existing taxpayer to fund new development. It is a political fact of life that elected Councils are wary of tax supported staffing increases for DAP. They are typically more willing to consider DAP fee supported staffing with only minor net tax supported budget impacts.

Innovation in the design of DAP fees is critically important for growth municipalities. Transitioning away from flat/fixed base fees for Subdivisions and Site Plans is necessary. The alternative of a base fee ($) + a per unit/lot/hectare escalator ($) is a best practice. A full-cost DAP fees review to ensure Planning Act Section 69 design compliance is also a positive step (activity-based costing fees justification). Finally, putting in place a % Construction Value fee to fund 100% of the required engineering review staff processing capacity is essential. The % Construction Value fee rate "sweet spot" based on peer comparisons is between 5% to 6%. Tiered % Construction Value rates (as in Milton and other GTA greenfield growth municipalities) are also a useful innovation in fees design.

Overall DAP cost recovery targets in the 75% to 90% range are advisable. The DAP cost-of-service base for these recovery targets should include IT system costs, indirect support costs like HR/Finance/Legal, governance costs and frontline DAP delivery costs wherever they are located in a municipal organization structure. The DAP cost base must be understood to extend well beyond a generic Planning department.

Once the DAP fuel is in place, via well designed fees and aggressive cost recovery targets, the pathway to adequate resourcing/staffing becomes readily achievable.

6.2 Case Study: Business Process Re-engineering to Improve Application Timeframes

The Province has relentlessly increased pressure on municipalities to accelerate DAP processing velocity. Bill 108 has compressed the "no municipal decision" timeframes trigger for an OLT/LPAT appeal (see table below).

Bill 108 is a DAP Timeframes Game Changer

	Pre-Bill 139	Bill 139	Bill 108
Official Plan Amendment or OPA/Re-Zoning Combo Pack	180 Days	210 Days	120 Days
Re-Zoning	120 Days	150 Days	90 Days
Subdivision Draft Plan	180 Days	180 Days	120 Days

Site Plan Section 41 "no decision" trigger for OLT/LPAT is 30 Days

Across dozens of DAP review assignments, Performance Concepts/Dillon has documented process re-engineering "quick wins" that are applicable to Brantford. These process re-engineering "quick wins" can help stabilize/reduce overall DAP execution timeframes as Brantford faces the imminent challenge of rapidly escalating application volumes and workload.

Carefully Calibrate Overlapping Planning and Building Permit Processes

Many Ontario municipalities still employ a *sequential* processing model where Building Permit applications are not encouraged prior to Site Plan agreement execution or Subdivision lot registration. The sequential model typically triggers aggressive Building Code Act timeframes for a Building Permit decision by the municipality - since applicable law is typically in place and a complete Building Permit application has been submitted.

A growing number of Ontario municipalities have opted for an *overlapping* processing model.

Once a Site Plan application has progressed to a certain point (typically a 2nd completed technical circulation or Engineering sign-off on the site drawings), a Building Permit application is encouraged. The Building plans examination process is executed in parallel with the production of the Site Plan development agreement and the final execution of that agreement. Once the Site Plan agreement is executed the Building permit decision is immediately delivered on a "just in time" basis (thereby satisfying applicable law requirements). From the point of view of the applicant, the overall timeframes for the overlapping model are significantly shorter that the sequential approvals model. The Building

permit issuance timeframe may take longer than the Bill 124 standard, but the overall DAP timeframe for the applicant is shorter.

Rather than rely on ad-hoc communication between Planning and Building staff to coordinate the overlap, the emerging best practice is to implement a DAP workflow technology solution. The workflow tool solution works in the following manner:

1. Establish a Site Plan process milestone that acts as the trigger for receipt of a complete Building Permit application. A common trigger point is Engineering sign-off on the Site Plan drawings.
2. Create a progress "checkmark" in the workflow tool for the above selected trigger point. If that trigger is not check marked in the workflow tool, the workflow tool will not initiate/accept a new Building Permit application for the project in question.
3. Once the trigger point has been check marked, Building staff proceed with their application review and they arrive at a permit issuance decision. The Building Code Act timeframe clock has been turned off because final Site Plan approval has not been secured.
4. The workflow tool is pre-programmed to prevent issuance of a Building Permit (once the permit decision milestone has been reached) unless a second Site Plan process trigger has been check marked - Final Site Plan approval that culminates in the agreement execution. Once that second trigger has been check marked, the workflow tool will permit Building Permit issuance.

The case study best practice is best expressed as carefully calibrated overlap managed/overseen with a DAP workflow tool functioning as a process coordination drawbridge.

Expand/Strengthen Upstream Processes to Generate Downstream Efficiencies

Rigorous quality control at the front-end of DAP can generate significant downstream processing benefits. The following front-end process innovations can reduce the duration and number of Technical Review Cycles that are the core driver of DAP conveyor belt velocity/duration.

- At the end of the Pre-consult process, require the applicant to enter into a mutually agreed upon written "Understanding" that documents the required DAP approvals and the supporting checklist of technical submission items for each application. The applicant should be required to electronically acknowledge the Understanding document, and an application submission cannot proceed without the acknowledgement of the Understanding document. This refined Pre-consult model places the municipality in a strong position to reject application submissions that do not conform with the requirements of the Understanding document - after all the applicant agreed to the requirements via the electronic acknowledgement.

  A DAP portal for application intake can be programmed to reject any application upload attempt by an applicant that does not include the complete inventory of submission checklist requirements set out in the Pre-consult Understanding document. A portal can/should filter incomplete applications according to the Understanding checklist for each pre-consult

(checklists imbedded in the DAP workflow tool and referenced by the portal when setting up application intake forms/screens).

- A 2-step quality assurance screening process can be implemented once an application has been successfully submitted across a DAP portal. The first step is a "piece count" scan. A municipal Planner/Planning Tech can quickly evaluate the submitted materials for each checklist submission item to ensure it appears to be valid and does not have obvious/conspicuous gaps. The second step is a "shallow dive" adequacy review where Planning/Engineering staff execute a content adequacy review of key submitted elements. This adequacy review is not as thorough as the upcoming Technical Review Cycle deep dive review. The key is to ascertain that the submitted materials are "good enough" to proceed for a Technical Review Cycle on a timeframe countdown clock with a targeted completion deadline. If the shallow dive review finds showstopper content gaps/inadequacies, then the application is refused, and remedial action is required of the applicant via a re-submission of the entire application package. If the shallow dive review finds the submitted materials adequate the application can be deemed complete/adequate, and an official 1st Technical Review Cycle can proceed according to its own timeframe clock/target.

Maximize Delegated Approvals Authority from Council to Staff

Progressive Councils that delegate Site Plan approval to staff are trading control for results. Site Plan timeframes can be significantly compressed once Planning staff execute the appropriate technical review, arrive at a delegated decision but do not need to produce Council reports, avoid having to schedule a decision on a future Council agenda, or risk an ill-advised decision by Council members not conversant in the technicalities of Site Plan technical solutions. Overall Site Plan approval timeframes can be reduced by 25% to 33% in the experience of Performance Concepts (compared to a sequential model). Contentious/disputed Site Plan files can be escalated by staff for Council consideration on an "exceptions" basis. It is worth remembering that Site Plan approvals do NOT require public consultation, making them delegation friendly. A range of other Planning/Engineering approvals are suitable for delegation - Condominiums, H Removal, development agreement execution, amended Draft Plan application approvals, Draft Plan extension etc.

Adopt Differential Processing Time Targets for Technical Review Cycles

Technical Review Cycles are the core work element in Planning/Engineering DAP. The technical ping-pong between applicants and the municipality needs to be executed in a timely fashion, but not so fast that due diligence in securing design excellence is compromised. Timeframe targets for timely municipal review are essential. Timeframes are measured in *file processing days under municipal control*. The municipality cannot control the timeframes of the applicant on that side of the technical ping pong game.

The 1st Technical Review Cycle is a different animal than subsequent Review Cycles. All of the technical submission items submitted with the application are still on the table and require comment/analysis.

Any quality gaps/content problems with submitted items need to be addressed/resolved. In contrast subsequent Review Cycles will deal with progressively fewer items, and the complexity of the comments/analysis will hopefully be reduced. Bottomline, 1st Review Cycle timelines need to be longer than subsequent Review Cycle timelines.

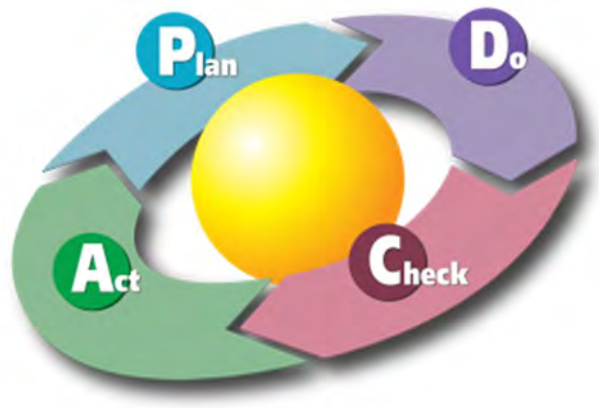
Differential processing time targets should also address the issue of complexity. Reviewing a 400 unit/20 Hectare Subdivision Draft Plan is inherently more complex than reviewing a 100 Unit/10 Hectare Draft Plan. DAP fee design acknowledges this complexity gap by applying a per unit escalator ($) on top of a base fee ($). Processing timeframes for Review Cycles can/should reflect these complexity realities. For instance, a 1st Review Cycle timeline of 35 business days might be sufficient for a Detailed Engineering Review phase of 100 units. But a 200 units Detailed Engineering Review phase of 250 units may well require a 60-day Review Cycle.

The combination of a longer 1st Review Cycle, with an overlay of additional time for complex/larger applications, constitutes a processing/measurement best practice for growth municipalities.

6.3 Case Study: Using Workflow Tool Supported KPIs to Implement a Results Based DAP Model

From a process execution perspective, DAP is best understood as a "ping pong" game played by Brantford municipal staff, External agencies like the GRCA and applicants. Technical submissions supplied by applicants "ping pong" back and forth until the City and External agencies are satisfied that the required land use and infrastructure design approvals can be granted to the applicant. At any given point in time a Planning DAP application is under the management/control of the municipality or the applicant. A timely/predictable conclusion to the DAP "ping pong" game is a shared objective of all participants.

Key Performance Indicators (KPIs) are a must-have component for a DAP model to function according to Results Based Management principles. DAP KPIs must be designed to track/measure *controllable processing days* that an application spends on the municipal side of the "ping pong" game. Conversely, it is the applicant's job to measure/manage the number of days the file spends under their control. *Controllable processing day* KPIs can be used to set performance targets across key DAP progress milestones. *Actual controllable days* can be compared to *targeted controllable days*. Targets can differ across the various DAP application categories (i.e., Site Plan versus Minor Variance). Targets can also differ across DAP application processing milestones (i.e., Deemed Complete versus 1st Technical circulation versus Development Agreement production).



The Results Management Cycle

KPIs and performance targets based on *controllable file processing days* inject process execution discipline into DAP. Accountability is improved via regular comparisons of actual required processing days versus targeted days. All of this data can and should be tracked and reported via a DAP workflow tool like AMANDA.

Peter Drucker, perhaps the most highly regarded management thinker/guru of the 20th century, often noted that "…you can't manage what you can't measure". Results focused KPIs will promote a DAP culture of accountability within any municipal management team, and KPI data/targets will inform a municipal staff team's decision about which DAP files to work on at any given point in time.

Setting DAP performance targets is an iterative process. Prior to tracking timeframe progress in a DAP workflow tool, a municipality can set "soft" targets that are not informed by actual tracked timeframes. Once reliable timeframe tracking data is available from an adopted DAP workflow tool solution, targets can be firmed up and annual actual processing timeframes can be evaluated against annual planned timeframes. If actuals fail to meet targets, process or staffing adjustments will be required to close the gap. The ultimate destination is an annual Plan-Do-Check-Act cycle of measurement-driven continuous improvement - a Managing for Results framework for DAP.

7.0 Towards "As Should Be" DAP Transformation

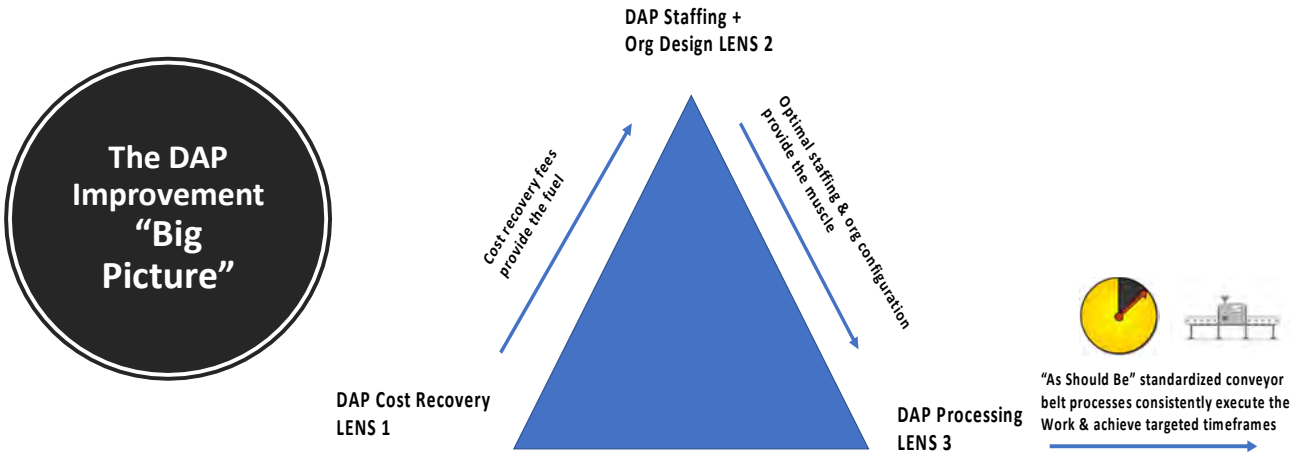
Transforming DAP into a high-performance service delivery model requires sustained improvement/modernization across three performance lenses (see figure below).

The 1st "big picture" performance lens is the DAP cost recovery/revenue stream lens. DAP fee design innovations and aggressive "growth pays for growth" fees pricing are critical ingredients to provide the fuel for robust/necessary DAP staffing investments.

The 2nd big picture performance lens is the DAP staffing/org design lens. A robust staffing model that delivers the right amount/right cross-disciplinary mix of staff processing hours is essential to high performing DAP. Councils are more likely to approve robust staffing investments when the DAP fees fuel minimizes/eliminates property tax subsidization. An optimal org design is the final ingredient. One-stop-shop integrated Planning/Development Engineering models can be effective. So can integrated Development Engineering/Public Works models.

The 3rd big picture performance lens is the creation of "As Should Be" streamlined/coordinated DAP processes supported by a modernized IT portal/workflow tool solution. Process innovations that improve up-front submission quality pay downstream dividends during effort intensive Technical Review Cycles. Delegated Council approvals to staff also pay significant processing time dividends.

All three big picture performance improvement lenses interact to create the transformation benefits that Brantford requires to meet the challenge posed by imminent DAP application volumes.



7.1 DAP Cost Recovery Lens - Securing the Fuel

The Performance Concepts team's "As Is" analysis of peer municipal fees design/pricing has informed the "As Should Be" change/improvement investigation. The Performance Concepts team investigation of Brantford's current DAP revenue accounting practices have also played a role in the "As Should Be" performance improvement investigation. Fee modernization and improved cost-recovery can/should be linked to expected improvements in DAP process execution and the achievement of predictable application processing timeframes that meet transparent City accountability targets. Revenue stream increases create credibility problems with the development industry if expected processing improvements are not forthcoming.

7.1.1 Modernized Fee Structures - Specific Opportunities

Site Plan Fee Design

Brantford DAP fee structures reflect industry standards design with the exception of Site Plan.

The City's current Site Plan fee design is based on a fixed/flat base charge, with no supporting per unit/hectare/GFA escalator. This old school design does not reflect growth municipality best practices across the Golden Horseshoe. The City's current fee design reflects average file processing effort across too wide a pool of Site Plans. Lower effort/small Site Plans are cross-subsidizing higher effort/complex Site Plans in the current fee design. The addition of a per unit/hectare/GFA escalator will reduce the current level of cross-subsidization across Site Plans.

The City's current sub-par Site Plan fee (versus peers) reflects the design shortcoming of no per unit/GFA escalator.

The base Site Plan fee should apply to the first 25units of a multi-residential Site Plan. Then an open-ended per unit escalator ($) should be applied. The dollar value of the escalator should be derived from a detailed activity-based costing analysis of current/future Site Plan costs. This costing analysis/fee modernization should be completed by the end of 2021. A similar approach should be used to update the City's Non-res Site Plan, using GFA instead of units to create the escalator.

% Construction Value Fee Rate Adjustment

There is ample evidence in the peer municipal comparisons of this Engineering Review fee for Brantford to adjust its current 5% rate to 6% moving forward. The Brant boundary lands will generate an estimated $20M in Engineering Review fees over the next 10 years at the 6% rate. The resulting average revenues of $2M per year will fund unavoidable/required upgrades in City staffing and external consulting hours. The City's Engineering Review reserve fund will smooth out any year-over year revenue fluctuations. Reserve fund contributions/draw will ensure annual full-cost recovery for the required staff/consultant processing effort.

7.1.2 Aggressive "Growth Pays for Growth" Cost Recovery Targets

In 2014, Council mandated a 90% cost recovery target for DAP. However, the underlying City staffing and cost structures associated with DAP were not documented to support that target. For the 90% target to have meaning, these staffing and cost structures need to be specifically defined. The development industry and Council both need to forge a consensus around "90% of what".

Planning DAP should be governed by the same "enterprise" full-cost recovery financial policy framework as Development Engineering and Building. The cost recovery spending "base" is set out in the figure below.

Portions of the General Manager and Planning Director that are consumed by DAP should be recovered, as should the entirety of the Development Planning business unit. Additionally, Zoning Examiners in the Building department provide ongoing review of DAP files. Additional City business units that regularly comment on DAP files should also be included in the costing framework (e.g., Fire Department, Public Works – Water Division, etc.).

Based on growth municipality fee design "best practices", Long Range Planning costs that protect the interests of the existing community are typically not recovered by Planning fees that already recover 100% of Development Planner staffing costs.

BRANTFORD PLANNING FEE COST RECOVERY MODEL

Eligible DAP Staffing Cost Base:

100% of Development Planning Staff Team
66% of Director, Planning Administration
25% of General Manager and Admin Support
50% of the Zoning Examiners

+

External Department Indirect Support Functions (25% surcharge)
100% of designated AMANDA Configuration Specialist

The resulting DAP "growth pays for growth" revised cost recovery target should be *at least 90% of true activity-based costs* and should also incorporate an estimated 25% internal charge from City indirect support functions like Finance/HR/Facilities/IT plus Council governance. This support function internal charge allocation should apply equally to Planning/Engineering/Building DAP. City staff should finalize a multi-year Planning DAP cost recovery target prior to Council adopting the 2023 operating budget. This should be done in coordination a full-cost DAP fee review.

One benefit of a full-cost DAP fee review is the opportunity to objectively address the impact of DAP fees on development location decisions between municipalities. Over the course of 30+ DAP fee reviews, Performance Concepts has determined that full-cost DAP fees represent a relatively minor input cost for an average/typical single family housing unit. A full-cost fee review in Brantford will explode the myth that fee burdens materially impact overall housing costs. Developer location decisions may be impacted by other input costs beyond DAP fees (e.g., development charges) but there is no evidence municipal DAP fees are a decisive factor.

7.2 DAP Staffing/Org Design Lens - Securing the Muscle

Once Brantford's DAP fees revenue stream has been modernized to supply the fuel, the City can make critical investments to upgrade its resourcing/staffing muscle. That muscle will be deployed to execute streamlined DAP processes. Without the muscle the DAP processes will not be timely, and the City will be internalizing unacceptable levels of risk around a "planning by OLT/LPAT" worst case scenario.

The staffing investments justified/recommended below will not just "happen" after they have been authorized via the 2022 budget process. The recruitment market for skilled/qualified technical workers is very competitive. Municipalities are competing with each other and the development industry for these workers. Successful recruitment may require compensation models to be revisited. While there may be additional costs associated with recruitment, they are more than justified by the downsides of

an understaffed DAP model that creates "planning by OLT" risk and stymies the critically important increase in housing supply that the Province and municipal leaders all support.

Applications Forecast

Non-Res Site Plans	400 Ha / 50 Ha/Parcel = 8 Parcels x 30 Lots / Parcel = 240 Site Plans
Residential Draft Plan of Subdivision	500 Ha/ 20 Ha/Subdivison = 25
Post Draft Plan Detailed Eng Rev Phases	Assuming 2 Phases per Draft Plan Approval = 25 x 2 = 50

The Performance Concepts/Dillon team has worked with City staff to develop an evolving DAP applications volumes forecast for the Brant boundary lands (see above). City staff have already developed forecasts for infill and greenfield activity within the traditional urban boundary. The 500 Hectares of transferred Brant residential development lands will generate an estimated 50 Post-Draft Plan Detailed Engineering Review Phases (10 hectares each based on previous experience in Brantford). Draft Plans of Sub-division will typically consist of two such Phases, so there will be an estimated 25 Draft Plans generated across the Brant boundary lands. The 400 hectares of non-residential land will be divided into eight 50 Hectare Parcels, and each Parcel will consist of 30 Lots that will require Site Plan approval. In total an estimated 240 Site Plans of varying complexity will need to be processed. Tutela Heights will add to these totals for the northern lands. The exact timing of these applications is not certain, but the City's Area-Specific DC Background Study prepared by Hemson Consulting has concluded development demand/construction will very likely be front-end loaded across 2023-2027.

7.2.1 Development Engineering Resourcing/Staff Investments

In the figure below, estimates have been developed for City staff processing hours consumed by a typical Technical Review Cycle for Site Plans, Draft Plans of Subdivision and Post-Draft Plan Detailed Engineering Review. The number of Technical Review Cycles per application have been compiled into Average/Easy/Hard categories. Total processing hours have then been calculated by multiplying the typical hours per Cycle (for Site Plans/Draft Plans/Detailed Engineering Review) by the differing # of cycles in their respective Base/Easy/Hard categories.

	# Technical Review Cycles			Staff Processing Hours per Technical Cycle	Total Processing Hours (per Application)			Number of
	Average	Easy	Complex		Average	Easy	Complex	Applications/Files
Site Plan Cycles	3.0	2.0	4.0	50	150	100	200	240
Draft Plan Cycles	3.0	2.0	4.0	800	2,400	1,600	3,200	25
Detailed Engineering Review Cycles	3.5	3.0	4.0	500	1,750	1,500	2,000	50

In the figure below, Site Plans, Draft Plans and Detailed Engineering Reviews are each organized into 3 Scenarios. Each Scenario features a different mix of Average/Easy/Complex files. Total Processing Hours per Scenario are calculated for Site Plans, Draft Plans and Engineering Reviews.

		Distribution of Files			Estimated Processing Effort (Hours)			Total Hours per Application Type
		Average	*Easy*	*Complex*	*Average*	*Easy*	*Complex*	
	Scenario 1	120	60	60	18,000	6,000	12,000	36,000
Site Plan Cycles	Scenario 2	144	72	24	21,600	7,200	4,800	33,600
	Scenario 3	144	24	72	21,600	2,400	14,400	38,400
	Scenario 1	13	6	6	31,200	9,600	19,200	60,000
Draft Plan Cycles	Scenario 2	15	8	3	36,000	12,800	9,600	58,400
	Scenario 3	15	3	8	36,000	4,800	25,600	66,400
	Scenario 1	25	13	13	43,750	19,500	26,000	89,250
Detailed Engineering Review Cycles	Scenario 2	30	15	5	52,500	22,500	10,000	85,000
	Scenario 3	30	5	15	52,500	7,500	30,000	90,000

In the final figure below, The Site Plan, Draft Plan and Engineering Review required processing hour totals can be added together within each of the 3 Scenarios. That total required processing effort for each Scenario can be expressed as an annual average of required processing effort. The annual average required processing effort can be standardized into staff FTEs that each generate 1,800 hours of annual processing effort. The final insight is as follows: Development Engineering workload generated by the Brant Boundary lands alone could require up to 10 FTEs of new processing effort beyond the current staffing allocation that is consumed by existing workload in traditional City urban envelope. Realistically these 10 FTEs (if they can all be recruited) will also need to address infill application volumes and greenfield volumes within the traditional urban boundary.

	Average	*Easy*	*Complex*	Total Required Processing Hours	Annual Required Processing Hours	Annual Required FTE Equivalent
Scenario 1	50%	25%	25%	185,250	18,525	10
Scenario 2	60%	30%	10%	177,000	17,700	10
Scenario 3	60%	10%	30%	194,800	19,480	11

7.2.2 Development Planning Resourcing/Staff Investments

Development Planning staff act as the logistics coordinators/file quarterbacks of DAP. Their efforts are critical when it comes to consolidating work done by other City staff and external agencies. They are a process conduit to the applicant, and they often coordinate critical problem-solving negotiations on files. AMANDA modernization will create significant productivity/efficiency dividends for existing and

new Development Planners moving forward. The required new FTE resourcing adjustment for Development Planning (a process driven role) is not as significant as Development Engineering, where the workload is technical/substantive and expands in lockstep with application volumes

The City's growth forecast over the next three decades presents a three-pronged challenge: i) continued infill development, ii) ongoing greenfield development within the traditional urban boundary, and iii) the front-end loaded development of Brant boundary lands. The Brant boundary lands alone will generate an estimated 240 new Site Plans and 25 new Subdivision Draft Plans.

Performance Concepts has independently evaluated City staffing investments required to meet the three-pronged growth challenge. Based on our evaluation, two new Senior Planners are required to achieve acceptable processing timeframes moving forward into a period of spiking volumes. Additionally, an existing Junior Planner position should be upgraded to an Intermediate Planner, thereby creating a properly configured Development Planning team consisting of:

4 Senior Planners,
2 Intermediate Planners, and
2 Planners.

The 4 Senior Planners can be deployed to simultaneously address complex infill applications and large greenfield applications, including new block plan applications. The Intermediate Planners can be deployed to deal with the high volume of expected Site Plans. The Planners can take care of relatively simple applications, support the Committee of Adjustment, and fill capacity gaps under the direction of their senior colleagues. Through our evaluation, we also recommend that an existing administrative staff position will be re-purposed to support DAP by assuming logistical oversight of the Committee of Adjustment, freeing up approximately 1,000 billable hours for new files from the two Planners currently administering the Committee. This upgraded staffing model is only adequate if Council enacts the range of delegated approvals that staff and Performance Concepts have recommended, and if a modernized portal/AMANDA solution is put in place in a timely fashion. If these supporting measures are not put in place, additional Planner FTEs will be required.

Building Services Zoning Examiners (2 FTEs) engage/comment on most Planning DAP applications while also discharging duties under the Building Code Act. Securing an additional Zoning Examiner would be a prudent upfront staffing investment in light of Planning and Building DAP workload spikes expected in 2022 and beyond. Building permit revenue streams currently being allocated to the already healthy Building Reserve Fund can/should fund this necessary staffing upgrade.

AMANDA will play a critical role in managing the upcoming spike in application volumes. The City needs to upgrade its capacity to configure AMANDA, generate timely reporting, and on-board/train City staff. Adding an additional AMANDA specialist in order will ensure the City captures the process streamlining benefits generated by the recommendations put forward in this Final Report. This position can be funded via a mix of Planning/Engineering DAP fees and Building fees.

7.2.3 Potential Staffing Choke Points to Eliminate

A number of City DAP functions are delivered by individual staff members, without designated backup coverage or redundancy. On a go-forward basis the City will need to evaluate the DAP conveyor belt risk posed by these single-staff choke points. The cost efficiencies of single staff resourcing need to be balanced against the broader/more important issue of DAP resilience if a key staffer is unable/unavailable to perform or leaves City employment. Single-staffer choke points should be documented and targeted for elimination/mitigation as part of a DAP resourcing/staffing plan to be presented at the kick-off working session for the 2022 City budget.

A prime example is map preparation for City development files. One Planning staff member is currently responsible for all map production across all files. Choke points/delays in timely map production for development files have been reported during times of peak busyness across DAP, even before the flood of Brant boundary land files begin to move down the DAP conveyor belt.

7.2.4 Future Staffing Challenge: Expanded MOECC Delegation for Water, Wastewater and Stormwater

The Province has been engaged in a consultation process to expand its program that delegates approval authority to municipalities for Water, Wastewater, and Stormwater infrastructure. Historically Ministry of the Environment approvals have created a workflow/timeframes chokepoint in the DAP process across Ontario growth municipalities. By strategically downloading this important approval responsibility to growth municipalities the Province has created a positive opportunity to streamline greenfield Subdivision approvals and reduce processing timeframes. But this streamlining opportunity has a cost; Brantford will have to resource this new responsibility within its Development Engineering team and a designated P. Eng. will have to be put into place to independently approve infrastructure design on behalf of the Ministry. The City will need to proceed with timely due diligence to take full advantage of this major streamlining opportunity by preparing/staffing proactively. Positioning/staffing the quasi-independent P. Eng. Official "decider" is an important first step. Evolving changes in the role played by Conservation Authorities within DAP may also create future resourcing/staffing pressures for the City.

7.2.5 Better Support for Small Builders/Developers (Aligned to Economic Development)

Unlike most large/high-growth communities in the Greater Golden Horseshoe, Brantford's developer customers include many small builder/developers that require periodic support from the municipality. City staff support is important because these businesses are not resourced like a major developer, yet their contributions to the community generate a tangible economic development benefit. Brantford is somewhat at a crossroads here, with a desire to deliver an efficient DAP support service but there are simply not enough DAP staff hours to fully support these small builder/developers. Furthermore, it is understood these applicants need multiple touchpoints to receive/absorb the City's advice. These touchpoints are typically achieved via "pre Pre-consultation" meetings. These "pre Pre-Consults are not proper or formal Pre-application consultations in the purest sense. These meetings are actually development enquiries because these proponents are trying to ascertain the development potential of their property, and the application is not always coming in the immediate future. With all these extra development enquiries (not formal Pre-consultations), staff

resources are diverted from moving other developer's serious applications through the system. While adding more DAP staff resources may seem like the apparent solution, it is important to consider the "form follows function" paradigm in service delivery. The service that is needed to support small builder/developers is actually not development *application* review; rather, it is development *enquiry/facilitation*.

Staff resources for development *enquiry/facilitation* should exist within the purview of the City's Economic Development business unit. Economic development staff in Ontario growth municipalities typically serve as a "first point of contact" for development community stakeholders. These Economic Development staff provide a vital "concierge" service and help shepherd the developer towards formal DAP applications - sometimes being present through pre-application consultations and even continuing to liaise through application intake, circulation, and technical review.

7.2.6 The "One Window" Model for Executing DAP

Organization design should always be subjected to the test of *"form follows function".* DAP is no exception to this important organization design principle. The combination of in-fill development, greenfield development within the existing urban boundary, and the Brant boundary lands "game changer" will require transformation of function/process execution across DAP. Organization design either helps or hinders in that transformation of the DAP processing conveyor belt.

The Development Engineering business unit currently imbedded in Public Works will be a central actor in the transformed DAP model. This team will be dealing with an effort intensive spike in Subdivision, Site Plan and Detailed Engineering Review applications. The stakes are high. If they City falters in its mission to approve/safeguard the design of $335 million in *high quality infrastructure*, the downstream lifecycle costs of prematurely replacing that same infrastructure could be crippling. Seamless coordination of Development Planning and Development Engineering staff teams is essential. Close, ongoing cooperation and coordination with Development Engineering and Building staff teams is also essential. The support of the City IT team in modernizing DAP technology platforms is key to a high performing DAP. *Gathering all of these "team DAP" business units into a single DAP delivery department will secure the singularity of focus and capacity to generate the transformation required during this pivot point in the evolution of Brantford. Creating a single/integrated DAP business unit is consistent with the recommended governance reform to create a single DAP Committee of the Whole (COW).*

Conversely the Public Works department is going to be seriously challenged across its "construct and operate" lines of business across the coming decades of growth. Moving the infrastructure design component out of Public Works (Development Engineering) and into a single business unit focused on DAP land use/infrastructure design/inspection approvals will allow Public Works to focus on the enormity of the "build and operate" challenge it faces. Dotted line collaboration relationships at the City's senior management level will ensure the Public Works "build and operate" perspective/priorities remain clear to the Development Engineering team once it is relocated into a new Development Services department.

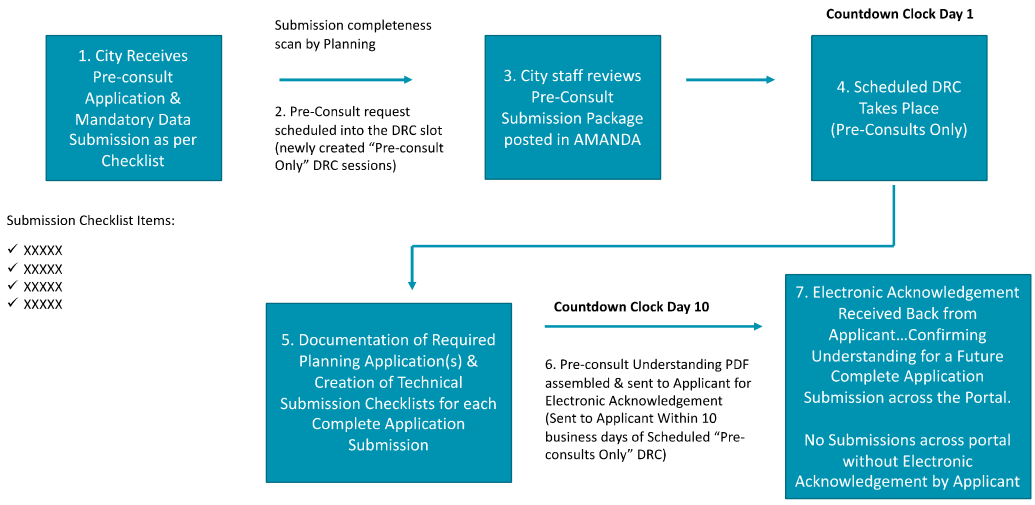
7.3 Strengthening the "As Should Be" DAP Conveyor Belt

Once the DAP fuel and the staffing/processing hours muscle have been modernized and upgraded to reflect the imminent Brant boundary lands game changer, there is an opportunity to streamline/standardize DAP delivery processes. Process improvement is inextricably tied to IT transformation via a DAP portal integrated with a fully utilized AMANDA workflow tool.

7.3.1 Securing a Formalized Pre-Consultation Understanding with Applicants

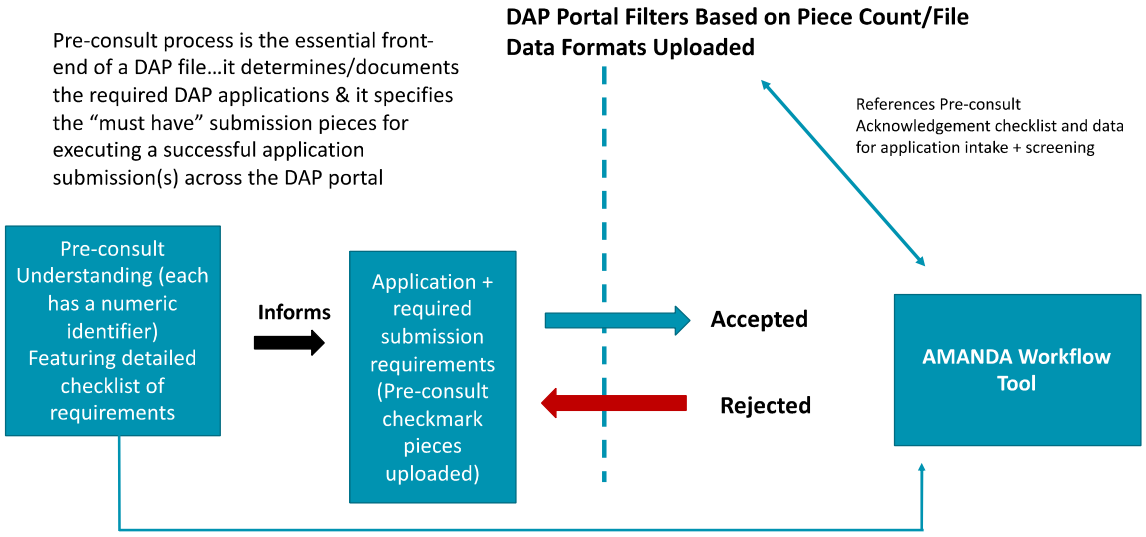
The City's pre-consultation model needs to be properly integrated with a new DAP portal and a fully deployed AMANDA workflow tool. The "As Should Be' process mapping (see figure set out below) preserves the City's 10-day service standard for producing a submission requirements package for applicants. It creates a channel of scheduled "Pre-consult Only" Development Review Committee meetings across the calendar year. These "Pre-consult Only" meetings will ensure that the necessary bandwidth is in place for a higher volume of Pre-consults as the Brant boundary lands block plans are completed and the flow of applications begin. A new Pre-consultation Understanding document will formalize the results of the Pre-consult meeting with applicants. Applicants will need to electronically acknowledge the contents and requirements of the Understanding in order to apply over the portal with applications for specific DAP approvals.

"As Should Be" Pre-consult Stage – Securing an Applicant Acknowledgement



DAP IT modernization will leverage the "AS Should Be" Pre-consult improvements. The figure below documents the interactions between a new Pre-consult Understanding, a new DAP Portal and a fully utilized AMANDA. Pre-Consultation and Application Submission are seamlessly integrated via these modernized DAP IT tools.

Portal/Workflow Tool – Filtering Application Completeness

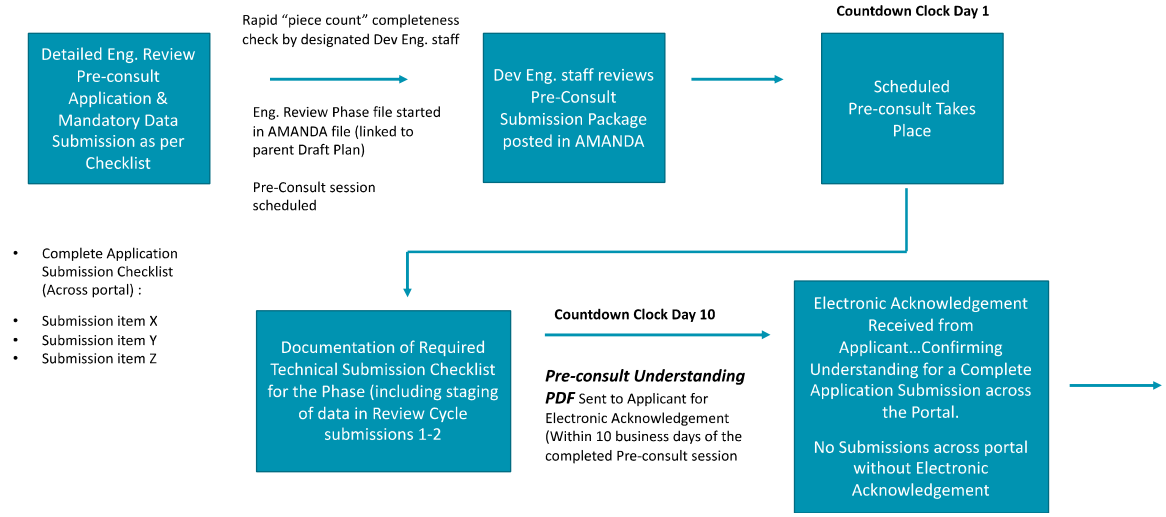


An intriguing process improvement opportunity at the Pre-consult stage involves the Draft Plan of Sub-division *Neighbourhood Meeting* executed by the Applicant. Moving the *Neighbourhood Meeting* much earlier in the DAP process could significantly improve the Draft Plan process for some Subdivisions. Requiring a *Neighbourhood Meeting* as a complete application requirement BEFORE application submission would ensure community feedback informs the DAP review prior to Technical Review Cycles are initiated. The current approach of timing the *Neighbourhood Meeting* during the Technical Review Cycle can be disruptive if community feedback prompts an applicant to make wholesale changes between Cycle 1 and Cycle 2. An earlier *Neighbourhood Meeting* eliminates the potential processing disruption by ensuring there are no community feedback surprises compromising a submitted application. The "As Should Be" Pre-consult model could accommodate this innovative timing adjustment for the *Neighbourhood Meeting*.

Engineering Review Pre-Consultation

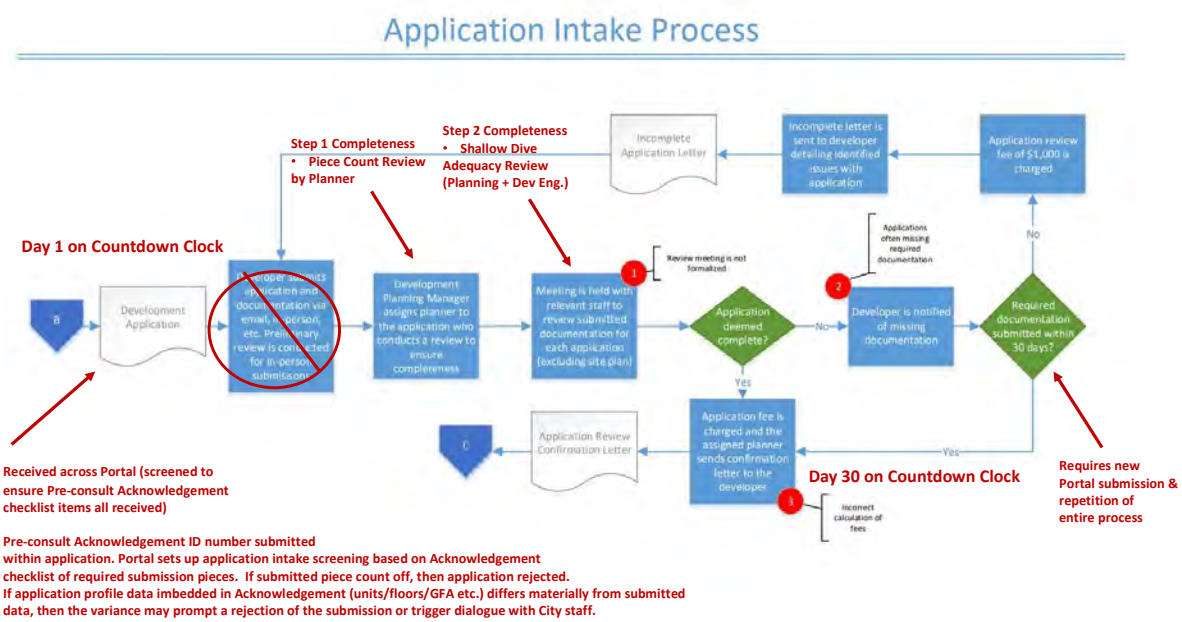
The City's execution of Post-Draft Plan *Detailed Engineering Review* phases will benefit from adopting a formal application submission process that begins with a new mandatory Pre-Consultation process (see process mapping figure below). The new *Detailed Engineering Review Pre-consult* will mirror the "As Should Be" process already set out in this Report for Planning Act applications. It will culminate in a formalized Pre-consult Understanding document that is delivered to the applicant within 10 business days of the scheduled/executed Pre-consult meeting. An electronic acknowledgement of the Pre-Consult Understanding terms/requirements by the applicant will be required before an application submission package will be accepted across the DAP portal.

"As Should Be" Detailed Engineering Review – A New Pre-Consult Understanding



7.3.2 Application Submitted to Deemed Complete/Adequate - Improved Quality Assurance

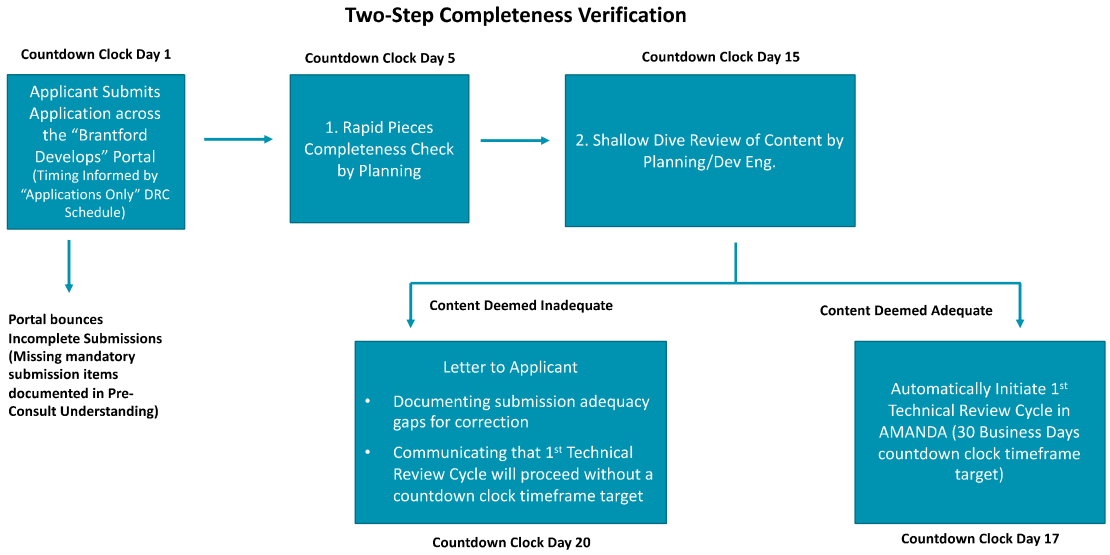
The "As Should Be" application submission process for most Planning DAP applications is set out below in the marked-up version of the City's current process map. The marked-up "As Should Be" process reflects the necessary deployment of a new DAP portal + a fully utilized AMANDA 7 workflow tool. Applications will be automatically screened before being accepted across the Portal. This will be accomplished by the Portal application intake screen referencing submission requirements imbedded in the numerically identified Pre-Consult Understanding stored in AMANDA. The City will then implement a 2-step completeness review much like its "As Is" model. Step 1 is a submission "piece count" confirmation designed to quickly confirm the receipt of potentially viable documents. Step 2 is a "shallow dive" content adequacy review. City DAP business units/assigned staff will access the application submission package in AMANDA, and then target their individual content adequacy "shallow dive" review to the specific submission pieces they are accountable for. An interdisciplinary staff meeting will then be held to certify the application adequate/complete or deem it inadequate/incomplete. This adequacy/completeness decision will be made within 30 days as per Planning Act requirements. If deemed complete the file will turn on the Province's LPAT "no decision" countdown clock and it will proceed for Technical Review Cycle "deeper dive" review. Inadequate/incomplete applications will require corrective re-submission of a submission and a repeat of the entire process. A complete re-submission requirement for inadequate files incentivizes applicants to supply high quality submissions in order to avoid re-submission delays. High quality submissions by applicants are rewarded with an expeditious pivot to the Technical Review Cycle section of the DAP conveyor belt.



Site Plan Application Intake

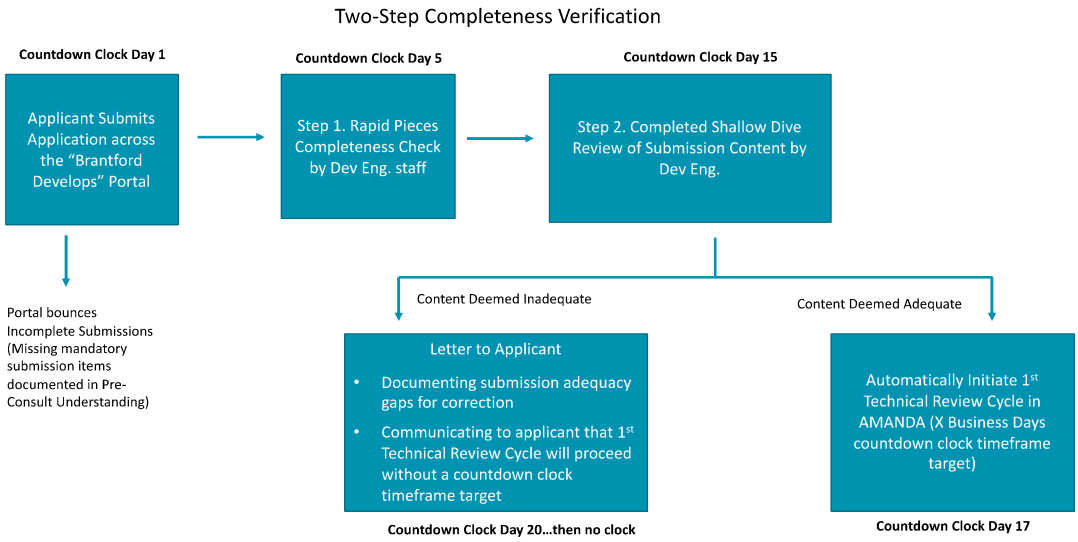
Site Plans are not subject to a municipal "deemed complete" process drawbridge, as are other Planning Act files like Re-Zonings or Sub-divisions. A more nuanced application intake process is therefore required. The "As Should Be" Site Plan application intake process is set out in the process mapped figure below. The Pre-Consult/Portal submission upload is exactly the same as other Planning applications. A Step 2 "Shallow dive" content adequacy review follows the Step 1 "piece count" verification. Files with adequate submission content move forward to Technical Review Cycle 1 with a timeframe target/commitment in place. Files that fail the content adequacy "shallow dive" will move forward, but without any specific timeframe target/commitment. Supplemental data will be required before an "inadequate" file moves forward for review - to be completed as/when staff resources are available. This approach services to incentivize complete/adequate Site Plan submissions despite the absence of a "deemed complete" legal drawbridge to refuse incomplete Site Plan files.

"As Should Be" Site Plan Process – Application Submission & Completeness Verification Stage



Following the execution of the new "As Should Be" Pre-consult for Detailed Engineering Review submissions, a 2-Step completeness verification identical to the Site Plan process will be executed. Inadequate submissions will proceed once corrected, but the 1st Review Cycles processing time standard will not be in place. Alternatively, complete/adequate submissions will proceed to the 1st Technical Review Cycle approximately 17 business days after acceptance across the DAP Portal.

"As Should Be" Detailed Engineering Review– Application Submission & Completeness Verification Stage



7.3.3 Technical Review - 1st Cycle and Subsequent Cycles

Technical Review Cycles to approve land use and infrastructure design are a core component DAP that consumes significant processing effort/time.

Site Plan Technical Review Cycles

Brantford's "As Should Be" Technical Review Cycles process map for Site Plan appears below. Each Review Cycle is supported by an AMANDA countdown clock that tracks controllable business days and prompts staff to action when timeframe target deadlines are looming.

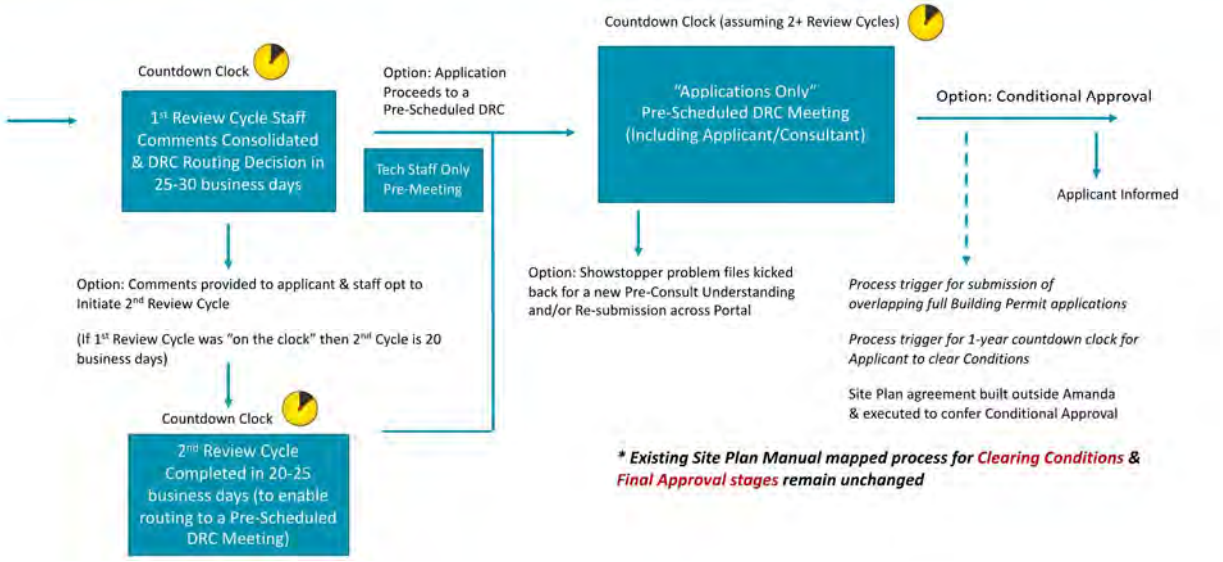
Notably the 1st Technical Review Cycle can/should be longer that subsequent Review Cycles. A 1st Review Cycle timeframe target of 30 controllable business days for Standard Site Plans is appropriate for a diligent deep-der dive across all submission items. If the Site Plan is unusually complex due to high residential units count, servicing challenges or other measurable factors, an additional complexity premium can be added to the timeframe target for the 1st Review Cycle.

Subsequent Review Cycles can be calibrated for 20-business day or 25-business day timeframe targets based on a complexity designation by staff.

All involved City staff should be trained in AMANDA and should be entering comments/mark-ups etc. directly into the AMANDA workflow tool. File Planners will be freed-up from their current onerous/low-tech consolidation of these various comments/mark-ups. Proper utilization/commitment to AMANDA will improve City consistency in meeting Review Cycle timeframe targets.

After the completion of required Technical Review Cycles, a staff-only review session will ensure the City team is on the same page re. the file and the potential approve with conditions/refuse decision. A new "Applications Only" Development Review Committee meetings between City staff and applicants will then deliver/confirm the details around a Conditional Approval/refusal decision. A Conditional Approval decision at the end of the overall Technical Review Cycle process will serve to trigger i) a complete Building Permit application ii) a 1-year Countdown clock for clearing Conditional Approval conditions.

"As Should Be" Site Plan Process – Technical Review Cycles/Conditional Approval Stage

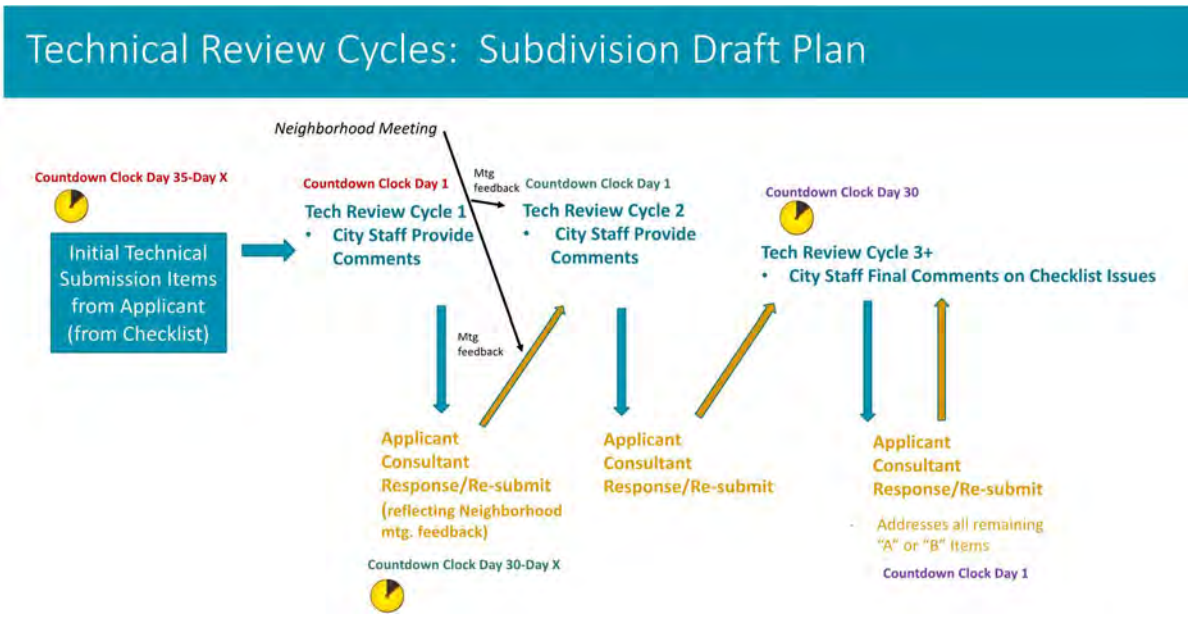


Subdivision Draft Plan Technical Review Cycles

Brantford's "As Should Be" Technical Review Cycles process map for Draft Plan of Subdivision appears below. Each Review Cycle is supported by an AMANDA countdown clock that tracks controllable business days and prompts staff to action when timeframe target deadlines are looming.

The 1st S Technical Review should be executed against a countdown clock target of 35 business days for standard applications. If the Subdivision Draft Plan submission is unusually complex due to a high residential unit count/lot count/hectares area factor, servicing challenges etc. then an additional complexity premium can be added to the timeframe target for the 1st Review Cycle. Subsequent Review Cycles may require timeframe targets similar to the 1st Cycle or perhaps slightly reduced. The required timeframe may be determined by the nature of community feedback received at the Neighbourhood Meeting (if it occurs during the Review Cycle component of DAP and not earlier before Complete Application Submission as already suggested as an option).

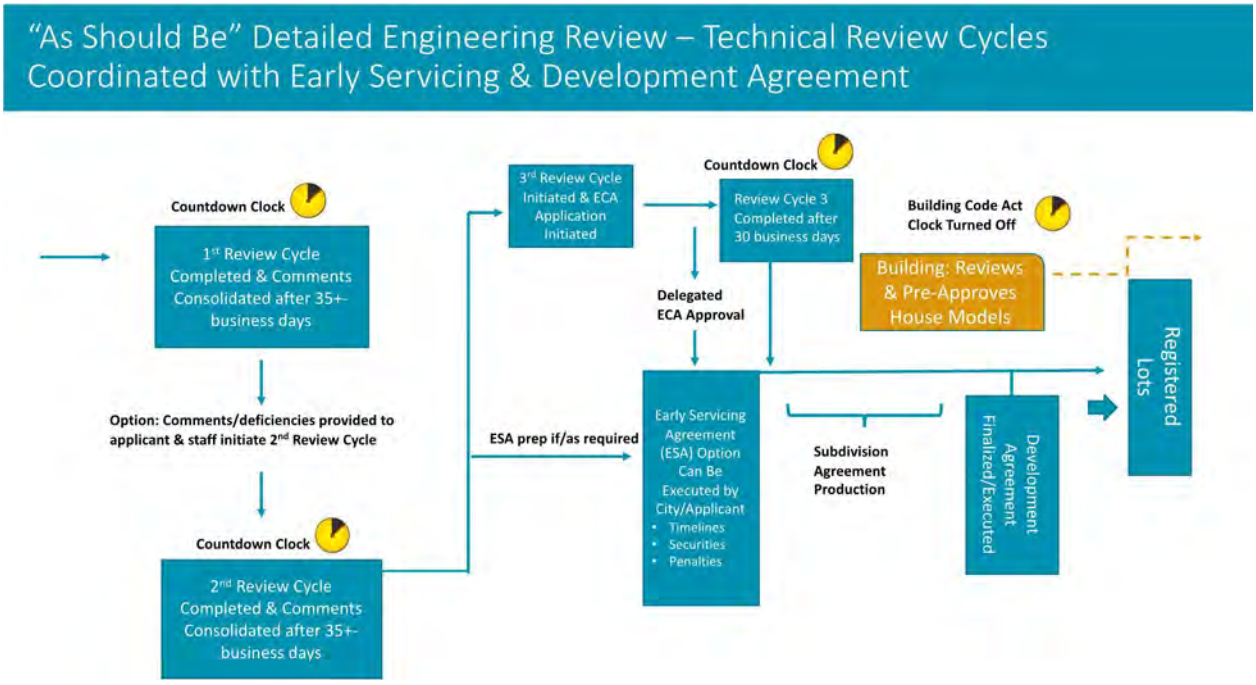
All involved City staff should be trained in AMANDA and should be entering comments/mark-ups etc. directly into the AMANDA workflow tool. File Planners will be freed-up from their current onerous/low-tech consolidation of these various comments/mark-ups. Proper utilization/commitment to AMANDA will improve City consistency in meeting Review Cycle timeframe targets.



Detailed Engineering Review (Phases)

Brantford's "As Should Be" Technical Review Cycles process map for Draft Plan of Subdivision appears below. Each Review Cycle is supported by an AMANDA countdown clock that tracks controllable business days and prompts City staff to action when timeframe target deadlines are looming. An aspirational 3 Technical Cycles model appears in the figure below. Each Technical Review Cycle is 30-35 business days long, unless the units/lot count is unusually high, and a complexity timeframe extension is merited.

The completion of the 3rd/pen-ultimate Review Cycle serves as a trigger for the Ministry of the Environment delegated approvals decision by the City. The Ministry of the Environment delegated approval by the designated City engineer in turn acts as a process trigger for an Early Servicing Agreement to be finalized with the applicant. This more rigorous/formal Early Servicing Agreement replaces the somewhat ad-hoc early servicing currently undertaken via the Site Alteration permit. The "As Should Be" result is a more coordinated process where approved infrastructure design at the end of the Technical Review Cycles has informed both the Ministry of the Environment approvals and the servicing solutions actually put in place after signing the Early Servicing Agreement.

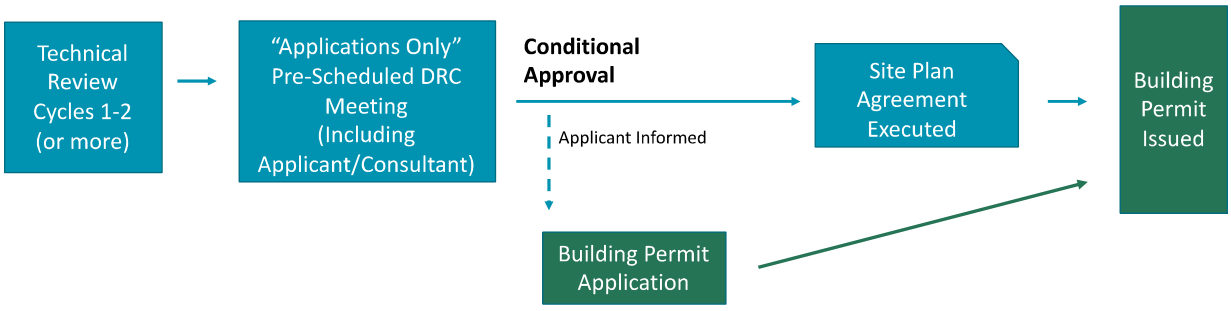


7.3.4 Planning/Engineering DAP Approvals & the Overlapping Transition to Building DAP

Brantford's Site Plan overlapping transition into to Building DAP mirrors the "best practice" approach set out in the 6.2 Case Study included in this Report. AMANDA becomes the process drawbridge for managing the overlap between Site Plan and Building, using specific process triggers to create a standardized/consistent baton hand-off. After 2+ Technical Review Cycles generate a Site Plan Conditional Approval at an "Applications Only" DRC meeting, AMANDA will accept a complete Building Permit application that has been knowingly taken "off the Building clock" because Site Plan is not complete. A complete Building Permit can be issued after detailed submission review by Building staff that runs in parallel with the clearance of certain Site Plan approval conditions, and the production/execution of the Site Plan agreement. The overall baton handoff result is a standardized/coordinated overlapping model that reduces overall applicant processing time and is managed/overseen using the "drawbridge" functionality in AMANDA that requires specific Site Plan triggers to be confirmed before Building processes can be initiated or completed.

Similar AMANDA drawbridge functionality will ensure that lots created at the end of the Detailed Engineering Review process are registered prior to Building permits being issued.

Site Plan Baton Handoff to Building

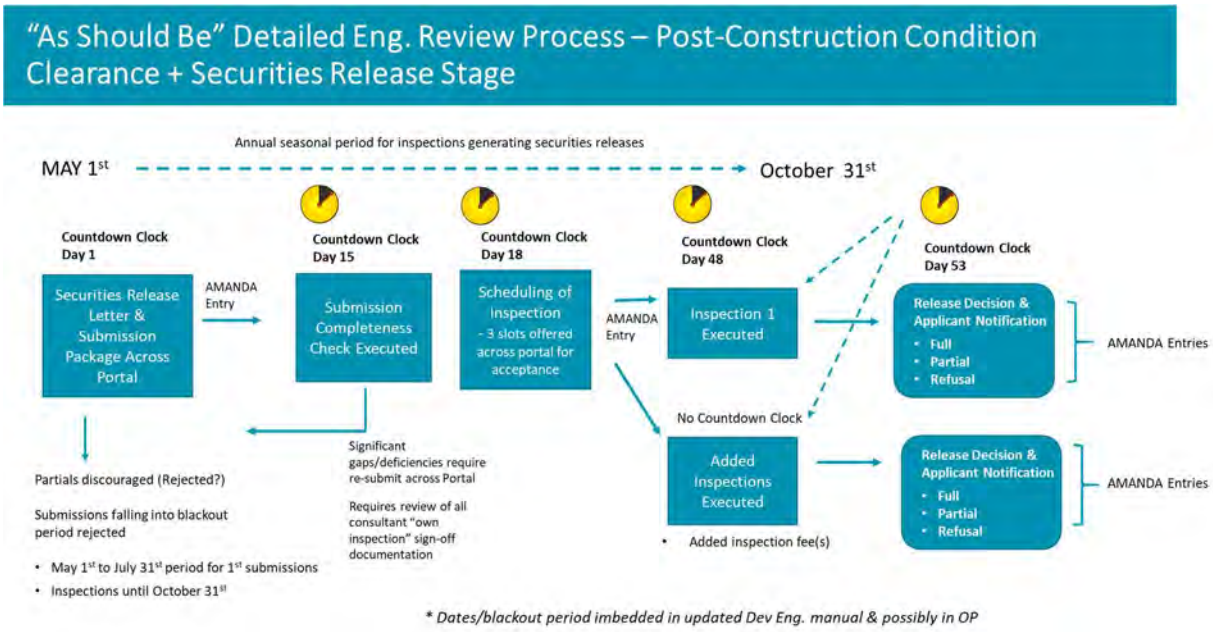


Process trigger for submission of overlapping full Building Permit application (Off the Clock)

Process trigger for 1-year countdown clock for Applicant to clear SP Conditions

7.3.5 Post-Construction Inspections & Securities Release

Planning/Engineering DAP continues on the far side of Building Permit issuance, mandated Inspections and Occupancy. Post-construction conditions imbedded in Site Plan and Subdivision agreements remain to be cleared. Securities collected to ensure condition compliance may be eligible for return to applicants. The process mapping figure below sets out the "As Should Be" Conditions Clearance and Securities Release stage of DAP.



Applicants submit a condition clearance/securities release package over the DAP Portal. A City staff completeness check is conducted, and the results of the check eventually generate a scheduled inspection offering within 18 business days. The scheduled inspection should take place within 30 business days of the application scheduling notification sent to the applicant. The securities release decision follows 5 days after the actual inspection, and Finance subsequently executes the actual release based on this decision. The entire process should be executed in 53 business days.

The nature of the post-construction inspection process requires that it be executed after a winter has transpired - therefore falling within the suggested May 1st to October 31st period. The remainder of the year is a blackout period where inspections/securities release is not viable. The timing of applications is therefore critical. A cut-off date of July 31st for applications is necessary to ensure inspections can be scheduled, inspections executed, and securities decisions rendered before the November 1st blackout period commences.

7.3.6 Expanded Council Delegation to Staff

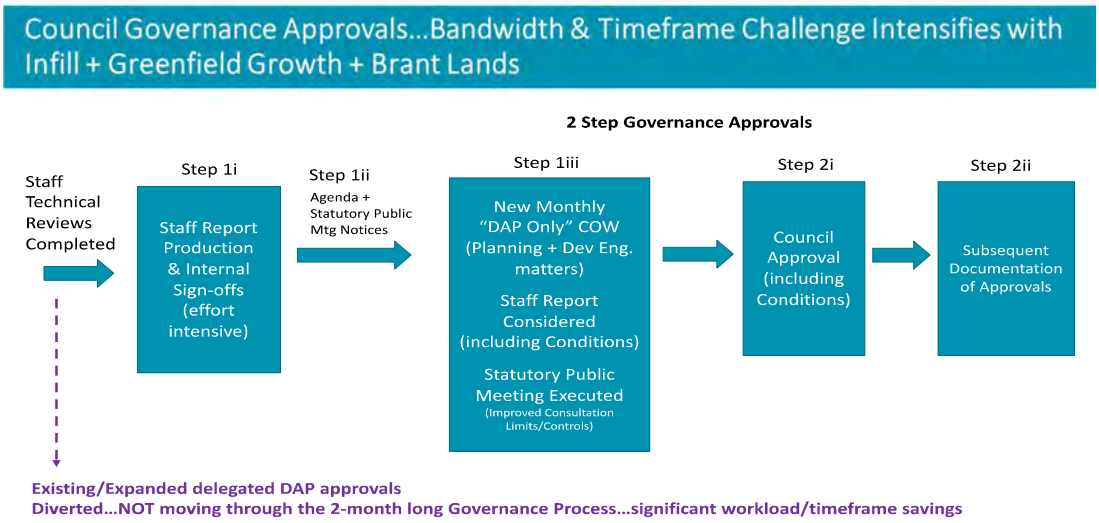
Staff are well aware that the current Governance framework requires restructuring in the shadow of the imminent Brant boundary land spike in application volumes. Expanding delegated approvals to staff will free-up significant amounts of report writing time to execute technical review work and expedite approvals. The "As Should Be" DAP conveyor belt will require these efficiencies (and others) to maintain appropriate/standardized velocity in the face of a game changing volumes spike.

Staff have produced a comprehensive Council report on delegated approvals expansion opportunities. That report has been independently reviewed by Performance Concepts/Dillon. Our team supports all the recommended delegation expansion options in the staff report. Our team's Interim Findings memo was supplied to staff during the finalization of their Council report. The Interim Findings memo is appended to this Report.

7.3.7 Governance – Creating Decision Making Bandwidth

The City's current approach to DAP Governance is unduly fragmented. Some DAP matters proceed through one COW channel. Other DAP matters proceed through another COW channel. The disparate pathways are defined solely by organization structure. This fragmentation will be counter-productive in the imminent high application volumes environment Brantford is about to experience. Integrated Governance review of Planning and Engineering DAP matters is required.

The figure below details an integrated "As Should Be" DAP Governance model. Bandwidth for COW and Council is protected by adopting delegated approvals for DAP where technically feasible. A new monthly DAP COW is created to deal with interconnected Planning and Development Engineering matters that have progressed down the DAP conveyor belt and require a Governance decision. The new DAP COW will also deal with Planning Policy and Building matters. Improved/Limited but still effective Statutory Public Meetings will also be executed at the new DAP COW. The two-month long processing timeframe for Governance decisions remains unchanged but the ROI for the expenditure of time and effort is improved because the decisions themselves have greater impact and importance.



8.0 File Audit Performance Insights

In addition to robust stakeholder engagement efforts undertaken with City staff and external stakeholders, the Performance Concepts/Dillon team undertook an examination of how the City's DAP system is implemented in real-time conditions. This real-time review focused on a sample of Planning Act application files and shadowing of internal and external meetings held as part of the development approvals process. This type of "on the ground" audit exercise enabled the Performance Concepts/Dillon team to validate the thematic elements heard during stakeholder engagement efforts, and to identify practical, real-world opportunities for process improvement and change.

The following sections summarize the application files selected for review by the consulting team, the methods used to review and evaluate the files, and the pertinent findings/performance insights drawn from the review exercise. Recommendations relating the file audit performance insights are included in **Section 11.2.3** of this Report.

8.1 Selection of Files for Review

The file audit included a range of Planning Act application types, categorized as follows:

- Three (3) files involving Draft Plan of Subdivision
- Six (6) files involving Site Plan Control; and
- Five (5) files involving Committee of Adjustment applications for Consent and/or Minor Variances.

The file audit included both inactive files (i.e., applications that had reached approval or were otherwise terminated) and active files (i.e., files currently under review by the City).

Files involving applications for Draft Plan of Subdivision included residential developments that took a two-phase approach and those that proceeded in a single phase. Files involving applications for Site Plan Control included a range of applications for residential and industrial uses. Committee of Adjustment files for Consent and Minor Variances included single, standalone applications for Consent as well as files involving combined applications for Minor Variances and Consent.

Files were also selected on the basis of the degree to which they proceeded through the development approvals system with or without issues. A cross-section of high performing and poorly performing files were selected for review. The high performing files reflected applications that followed the traditional, streamlined path through the DAP pipeline with few issues. The poorly performing files were those that experienced unusual delays, numerous resubmissions, and complex technical issues.

8.2 Audit Execution

The file audit was conducted with the assistance of City staff and involved three main tasks:

1. **Attendance at various planning meetings held by the City throughout the application review process.** To understand the journey that various file types traveled through, the consulting team attended the internal pre-pre consultation meeting held with staff (i.e., meetings held prior to a formal pre-consultation meeting), pre-consultation meetings held with applicants, and public Committee of Adjustment meetings. The consulting team's attendance at these meetings was intended to allow the consulting team to observe the format of the meetings, understand timing of files, and note specific technical details to understand the follow-thorough and resolutions to issues as they evolved and were applied by staff or the applicant. The consulting team also received and reviewed circulation emails and agendas for the Development Review Committee (DRC) meetings.
2. **Preparation of an evaluation framework.** An evaluation framework was developed to evaluate application files according to the following qualitative and quantitative criteria: processing timeframes; the degree to which established processes were adhered to; the degree of continuity of staff on each file; and the degree to which staff made use of existing functionality in AMANDA.
3. **Assessment and review of files.** Files were reviewed according to the evaluation framework with an eye for identifying key themes and patterns, with the results translated into findings and actionable performance insights.

8.3 Findings and Performance Insights

Findings and performance insights pertaining to each application category are detailed in the following sections. A summary table listing the findings and performance insights pertaining to each file reviewed as part of the audit is included in Appendix A.

8.3.1 Draft Plan of Subdivision

Three files involving applications for Draft Plan of Subdivision were reviewed by the consulting team.

8.3.1.1 Processing Timelines

The subdivision processing timelines varied in relation to the complexity of the application. The timelines ranged from 1 to 2 years, depending on the number of circulations required, time taken by the applicant to prepare resubmissions and time taken by the applicant and agencies to clear conditions. The phased subdivision file audited demonstrated efficient timelines: between Council Approval of the plan and Notice of Decision, which took less than 5 business days to issue, and between the completion of clearance of conditions and the City's letter to the Land Registry Office, which took approximately 1 month.

Staff did not make use of checklists to verify whether all application submission requirements had been met at the point of deeming an application complete or for receiving application resubmissions in any of

the files audited. The resulting lack of clarity and organization appears to extend the timeline for processing subdivision applications overall. For example, on a subdivision application that used a completeness check prepared by the applicant and which included a covering letter, the first circulation was expeditious, and the comments of staff were on necessary technical revisions to advance towards approval. In comparison, on a subdivision application that did not involve a completeness checklist, the first circulation had numerous comments from staff on improving the basic requirements of the submission because it could not be moved forward towards approval. Opportunities exist to shorten the timeline between key milestones of the subdivision process through improved communication between the City and applicants.

8.3.1.2 Adherence to Established Processes

Through an audit of the historic files, it appears staff generally followed the prescribed process map. Each subdivision application was unique in how it proceeded given technical issues with servicing, layout, or traffic considerations. The degree of organization and efficiency in addressing resubmission comments and clearance of conditions appeared to be driven by applicants. This resulted in varying degrees of success for applicants which resulted in longer timelines and/or more submissions and circulations. Greater clarity in the process could be achieved if the City employed standardized documentation for tracking comments and clearance of conditions.

8.3.1.3 Continuity of Staff

Through an audit of the historic files, there was continuity of staff from pre-consultation through to final approval and registry.

8.3.1.4 Use of AMANDA

It appears AMANDA is utilized by Development Engineering for Subdivision application tracking and commenting (a recent change in practice). Multiple City business units report they do not utilize AMANDA when they participate in DAP.

8.3.1.5 Other Key Themes

At the timing of the audit, no Draft Plan of Subdivision applications were brought forward for a pre-pre-consultation meeting or Development Review Committee for observation and analysis of further themes and trends.

8.3.2 Site Plan Control

Six files involving applications for Site Plan Control were reviewed by the consulting team.

8.3.2.1 Processing Timelines

Based on the historic files audited, the timeline from pre-consultation meeting with the applicant to approval for Site Plan applications was approximately 1 year. The file audit included a range of files that had varying degrees of complexity which influenced the processing timelines between key milestones.

In general, applications with a complete first submission, based on quality rather than checklist, experienced a shorter timeline, with fewer and more efficient resubmissions and circulations. A complete first submission resulted in the technical circulation comments being holistic and directive on critical changes that helped advance the file towards its approval. On other files, application timelines were extended based on the number of resubmissions required and effort required to evaluate major proposal changes. Turnaround times for technical comments rendered by the City appeared to grow shorter through each successive submission cycle as the nature of revisions became narrower in scope. The standard 2-week timeframe for provision of technical comments was consistently applied to each circulation cycle. The timeline between receipt of circulation comments by the Planner and dissemination of comments to the applicant ranged from 1 to 5 business days. Timelines for applicant responses varied widely. The timeline between final submission and final approval by delegated staff authority was approximately 1 month.

8.3.2.2 Adherence to Established Processes

The prescribed process map for Site Plan applications was closely followed by staff in most cases. In some instances, application-specific issues or modifications resulted in deviations from the established process. For example, resubmissions sometimes involved design revisions which were so extensive as to warrant a complete re-review of the file, as if it were a first submission. Staff applied judgement based on the technical matter at hand, and communication to the applicant regarding applicable next steps in the process was required.

The general process of holding a pre-pre-consultation meeting, holding a pre-consultation meeting with the applicant, issuing comments, circulation of the application, and conditional approval appeared to be an appropriate / efficient process for the City, subject to the degree of cooperation and organization on the part of the applicant. There were instances where the City had to accommodate multiple pre-consultation meetings because the applicant had let time lapse between the original meeting and preparation of the application and/or had requests for additional technical clarifications.

8.3.2.3 Continuity of Staff

Based on the files shared for auditing, staff continuity across the lifecycle of the file is very consistent. It appears that the same staff who completed the initial application intake and review also produced the final reporting.

8.3.2.4 Use of AMANDA

AMANDA does not appear to be utilized for Site Plan Control applications by any City department. The technical comments for Site Plan Control applications appear to be saved on an internal file drive rather than compiled in AMANDA for easy access by all City departments.

8.3.2.5 Other Key Themes

Through the meetings attended, it was observed that key themes and site-specific comments raised at the internal and applicant pre-consultation meetings directly translated into the comments circulated to applicants. Comment documentation clearly noted instances where additional information was requested from the applicant in the meeting(s). The anticipated complexity of the application was flagged early in the pre-pre consultation meeting presentation made by the Planner on file. This assessment of complexity appeared to help inform expectations of the other City departments and anticipated timeline.

8.3.3 Committee of Adjustment (Minor Variances, Consents, Severances)

Five files involving Committee of Adjustment applications for Consent, Minor Variance and Severance were reviewed by the consulting team.

8.3.3.1 Processing Timelines

The timeline based on the key milestones including initial application, technical circulation, public notice, public hearing, Notice of Decision, and issuance of conditions, as applicable, was approximately 3 months in total for files that were considered high performing. On the high performing files, the applicant had a complete application for technical circulation with minimal to no follow-up required by the Planner processing the application. The Notice of Decision was consistently sent out within 1 to 3 business days following the public hearing.

The timeline for files that were considered poorly performing had varying lengths related to the time between resubmission by the applicant or requests for deferral by the City due to outstanding technical issues left unresolved by the applicant. The nature of the files varied from simple files that dealt with 1 to 2 variances, to complex files involving multiple interrelated instances of variances, severances, and consents. It is noted that the quality of an application has a significant impact on the timing of two key procedural milestones: completion of technical comments, and the time taken for preparing the staff report. Additional correspondence with the applicant relating to site-specific questions and the need for follow-up documentation extended the timeline and caused some deviation from the prescribed process.

Process timelines closely correspond with the degree of application quality and completeness at the first submission and the degree to which each department is able to meet the designated timeframe for provision of review comments. In some instances, departments followed-up with additional comments following the technical review commenting window of time.

In the pre-pre consultation meetings, a substantial amount of time was spent on files that were not deemed complete. These files were often missing critical information from the applicant and the planner was unable to answer critical questions for staff to fully form an opinion or make a constructive comment. Reaching the early milestone of deeming an application complete took different planning staff different lengths of time relative to the timeframe allotted to do so. Often this was due to the

quality of the application and varying interpretations among planning staff regarding what constitutes "completeness".

8.3.3.2 Adherence to Established Processes

The key milestones in the process map were achieved to advance COA applications. Due to the unique site circumstances and technical differences on each file, staff engaged with the applicant as much or as minimally as needed to move the application from through the process. The applicants' response time varied. In some instances where additional technical comments were not addressed, a deferral was warranted and agreed upon with the applicant. The process of deferring the application to be heard at later meeting date was mutually agreed upon and needed to ultimately advance the application. The process maps present a high-level route for an application to follow. Staff applied their judgement on key tasks and communications required to move between larger milestones along the route. It is noted there was a varying degree of difficulty to the files audited.

8.3.3.3 Continuity of Staff

Based on the files shared for auditing, staff continuity across the lifecycle of the file is very consistent. It appears that the same staff who completed the initial application intake and review also produced the final approvals.

8.3.3.4 Use of AMANDA

The use of AMANDA for file tracking and updates does not appear to be applied by staff for Committee of Adjustment Applications. The technical comments for Committee of Adjustment applications appear to be saved on an internal file drive rather than compiled in AMANDA for easy access by all City departments.

8.3.3.5 Other Key Themes

Through observation of the pre-pre consultation meeting and applicant-attended pre-consultation meeting, there was a consistent carry through of themes discussed. The internal pre-meetings produced a range of technical insights, issues, and key messages from each department. The round-table approach to the conversation is thorough and allows for all departments to raise their comments, get "live" input and answers to questions. This process was time-consuming and could be refined to focus on contentious comments.

The comments raised at the pre-pre-consultation meeting are compiled by the Planner upon receipt and shared with the applicant in a preliminary fashion prior to the applicant-attended pre-consultation meeting. The preliminary comments were observed to be well-received by most applicants. The themes that were raised at the internal pre-meeting were also discussed in detail, as needed, with the applicant.

Overall, the Development Review meeting forum allows for a thorough and detailed review of all departmental comments on technical matters that can overlap and be interrelated for minor variances,

consents, and severances. Given the date of the files shared for auditing purposes, a review of consistency in themes from internal discussions to applications and approvals was not possible.

9.0 AMANDA Proof-of-Concept for Site Plan

A modernized AMANDA configuration for Planning/Engineering DAP will improve efficiency, reduce staffing upgrade costs in the newly recommended *One Window* DAP team, and secure processing timeframe accountability by comparing actual tracked timeframes against targeted commitments to the public/development community.

9.1 DAP Workflow Tool Functionality Requirements

The following DAP workflow tool functionality requirements need to be considered by the City as it moves forward with DAP modernization/process improvement. These requirements apply to any DAP workflow tool solution – not just AMANDA.

1. Track the progress of each/every DAP file against/across standardized milestones linked together in a mapped/consistently executed process (DAP is horizontal/linear)
2. Document & report elapsed timeframes (# file processing business days) to progress from one standardized processing milestone to the next milestone (when a DAP file is under municipal control).
    - Business rules to trigger a mutually recognized file transfer back and forth between an applicant and a municipality.
3. Document and report applicant/consultant controllable file days (as per above).
4. Link the various Planning DAP/Engineering DAP/Building DAP review/approval processes around the specific land parcel that is the central focus of the applicant's journey… speaks to GIS integration
5. Attach City staff documents/comments/approvals to a Planning DAP/Engineering DAP/Building DAP file – with that information attachment being process milestone specific
6. Generate timeframe reporting analytics for all internal business units + external agency partners. Timeframe reporting requires time stamping for each/every significant processing milestone within/across Planning DAP/Engineering DAP/Building DAP
7. Triage each application file's processing urgency/aging in order to support City staff decisions around which file(s) to work on first at the beginning of any given day
8. Prompt staff when DAP files are approaching timeframe target deadlines & reduce the risk of missing a milestone specific timeframe target
9. Produce multi-file analytics profiles across a group of similar DAP files based on key standardized processing milestones. For instance, all active Site Plans. Or all active applications belonging to ACME Development Inc.
    - Result is a "photo snapshot" of linear progress/status for a collection of relevant DAP files within a single comparative report
10. Regulate/link various processing milestone approvals delivered by different municipal business units …create sequential approvals "discipline" with check-off boxes "clicked" at milestone X before milestone Y can be completed (process drawbridges to create/enforce sequencing)

11. Must be available/used by ALL DAP participating staff/business units (including Conservation Authority/Upper Tier/Consultants as applicable). Requires remote access + full functionality beyond City Hall.
12. Portal must contribute to impersonal "zero tolerance" complete submission discipline when filtering uploaded submission attempts…tied to the pre-consult submission checklist acknowledged by applicants.

9.2 Functionality Review of AMANDA – Can It Do the Job in a Transformed DAP?

Brantford has enjoyed success in using AMANDA as the "central nervous system" of its Building DAP model. Building departments across Ontario are obligated in law to track permit decision timeframes and inspection notification timeframes. A culture of measuring process execution and controlling application submission quality is common across Building departments.

Municipal Planning/Engineering DAP teams across Ontario have not always developed the same measurement/timeframe driven culture. The use of the AMANDA workflow tool as the "central nervous system" of Planning/Engineering DAP has lagged the pioneering efforts in Building departments. While many of the functionality requirements are similar, it is nonetheless important to confirm that AMANDA 7 (Planning Module + Condition Clearance Module) will deliver the required Planning/Engineering DAP functionality. These modules will need to integrate with Bluebeam drawings markup software and the City's GIS property layer. The result will be an integrated/modernized DAP IT solution.

The figure below documents the results of an AMANDA functionality assessment carried out by the North Lakes Design Lab on behalf of the Performance Concepts/Dillon team. The results of North Lakes Design Lab's functionality assessment are clear - without claiming that AMANDA is a superior solution compared to other workflow tools in the market, we have high confidence that AMANDA 7 can deliver the required functionality for Planning/Engineering DAP moving forward.

WORKFLOW TOOL

#	Functionality:	Explanation:	Priority:	AMANDA ver 7
1	User Configurability	City IT support must be able to easily change process milestones, timeframe metrics and staff approval authorities internally	Required	✓
2	User Permission Setting	City IT support must be able to create users for internal staff and external agencies, with customizable permission settings	Required	✓
3	Local Municipal Customization	DAP Workflow Tool must be able to support parallel / customized processes / business rules / participants across all City business units	Required	✓
4	Integration with Land Parcel Information Systems (GIS)	DAP Workflow Tool must link all Planning and Building applications back to the orginating land parcel/property owner/applicant	Required	✓
5	Application Milestone Tracking / Current Status	Track the progress / current status of each/every DAP file against/across standardized milestones linked together in a mapped process (DAP is horizontal/linear).	Required	✓
6	Application Milestone Measuring	Have the ability to count "controllable business days" for each file based on the "custody" of the file (municipal custody + applicant custody)	Required	✓
7	System Wide Measurement (KPIs)	Ability to count "system-wide" units of work (e.g. number of pre-consults, number of complete applications, number technical review cycles, number of approved applications, other KPIs etc)	Required	✓
8	Timeframe Target Setting	DAP Workflow Tool must have the ability to set countdown clock performance timeframes for each milestone/application category	Required	✓
9	Timeframe Actuals Reporting	DAP Workflow Tool must be able to report actual timeframes vs targets for each individual application and system-wide by application category	Required	✓
10	File Aging/Triaging	DAP Workflow Tool must be able to provide "real time" data on files approaching timeframe target deadlines	Required	✓
11	Staff Prompting	DAP Workflow Tool must be able to prompt staff regarding file status, aging and file triage based on red, amber, green status or similar notifiation scheme	Required	✓
12	Usable by all Business Units	DAP Workflow Tool must be accessible by all DAP business units in all four municipalities (assuming reasonable internet bandwidth)	Required	✓
13	Intuitive/Friendly User Interface	DAP Workflow Tool must be easy to understand, user-friendly and intuitive for both full time users and occasional part-time users from external agencies/actors	Required	✓
14	Document Version Manager	Ability to keep a constant "working" version of all Submission documents/attachments/staff comments while providing access to previous versions. Documents stapled to specific milestones. Creates file audit / OLT capacity.	Required	✓
15	Fee Calculation/Processing	Workflow Tool functionality should include calculation and payment confirmation of DAP fees and Development Charges (at point of application or later)	Optional	✓
16	Training	Vendor capacity to provide training relevant to applicants, consultants, external agencies and municipal staff	Required	✓
17	Multiple Workflow Tool Integration	Overall Workflow Tool solution able to integrate separate Planning and Building modules supplied by different vendors (e.g. City may have different existing or procured backend tools for Building DAP) (Integration examples include BLUEBEAM, GIS, ASYST and MPAC)	Optional	✓

9.3 AMANDA – City's Portal/Workflow Project

Moving forward, the City intends to integrate a DAP portal with an upgraded AMANDA 7 workflow solution featuring the Planning and Condition Clearance modules. The envisioned DAP portal will allow applicants to engage in online application submission, fees payment and file progress tracking. The portal will play an important role in securing complete, high -quality submissions that comply with transparent and granular submission content specifications. Quality control efficiencies will be secured by the portal automatically refusing substandard application packages - thereby rewarding and incentivizing high quality submissions and diligent applicants.

The AMANDA 7 workflow tool will be integrated with the portal. This integration will strengthen the process execution of both Planning/Engineering DAP and Building DAP.

9.4 AMANDA – Site Plan "Proof-of-Concept"

In order to integrate Brantford's evolving DAP technology platform with "As Should Be" processes, Performance Concepts/North Lakes Design Lab has undertaken an AMANDA 7 implementation "Proof-of-Concept". The Proof-of-Concept has focused on a standard Site Plan application. AMANDA 7 has been configured (with full functionality) to manage/regulate the execution of a Site Plan from Pre-consult through to Approval and onwards to final clearance of Conditions and return of securities. The process documentation, timeframe measurement, and City-wide participation issues resolved in the Site Plan Proof of Concept will inform the rollout of a modernized AMANDA solution for all Planning/Engineering DAP application categories across 2022.

When completed, the Site Plan Proof-of-Concept will reside in the AMANDA Planning/Condition Clearance modules.

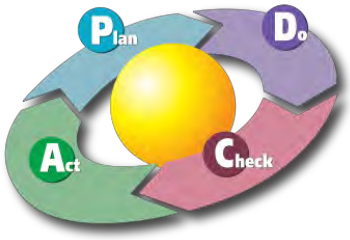
9.5 Capturing Benefits of Improved Workflow Functionality in AMANDA

Performance Concepts/North Lakes Design Lab have developed a go-forward AMANDA Configuration Roadmap. The Roadmap sets out a sequencing of DAP file categories that will be documented/configured in AMANDA to reflect the performance improvements identified in this Final Report. Within each DAP file category (e.g., Subdivision) a series of technical configuration tasks/steps across the AMANDA modules will be integrated into "To Do Recipe" that will deliver the same AMANDA functionality improvements already secured in the Site Plan Proof-of-Concept work that has already been completed. The resulting critical path/roadmap will end up addressing the core DAP file categories, the AMANDA configuration recipe in each category to secure the required countdown measurement of timeframes clock and other functionality benefits, and the documentation of City staff requiring AMANDA licenses and training. The AMANDA Configuration Roadmap will be submitted to the City independently/outside of this Final Report.

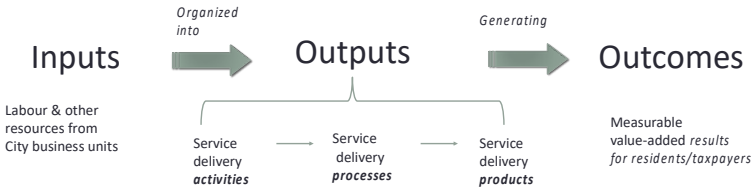
10.0 Towards Results Based Management - Key Performance Indicators (KPIs)

The Development Approvals Process (DAP) is a horizontal service delivery system that involves multiple actors within the City as well as external agencies like the GRCA. DAP extends across Planning Act, Engineering and Building Code Act components. Each of these DAP processes/components generate countable units of output. These countable DAP outputs/products in turn create positive outcomes/impacts for both applicants and the existing Brantford community.

Towards Results Based Planning/Delivery of DAP



Key to Results Based Management: Understanding Municipalities as Service Delivery Systems (Service Logic Model)



The DAP service delivery model is complex due to the multiplicity of actors and approvals processes associated with different types of land use and infrastructure design decisions.

But DAP is measurable/manageable when the right mix of data management and performance measurement tools are brought into play. An interactive Portal + AMANDA technology platform is crucial to measuring and reporting on DAP performance.

10.1 DAP Can Be Standardized with LEAN Thinking/Toolkits

Feedback from the development community across the Golden Horseshoe is remarkably consistent. The DAP conveyor belt should function with consistent and predictable velocity. Consistency, not absolute velocity, is the key to a high performing DAP model in the eyes of the development industry.

From the perspective of the existing Brantford community and key stakeholders, the quality of review by the City (due diligence) is paramount.

The sweet spot is achieved by balancing appropriate due diligence and predictable/consistent velocity across the DAP conveyor belt. The figure below sets out these balancing requirements in terms of LEAN Thinking around performance improvement.

Building the City's DAP "Industrial" Assembly Line

1. **Velocity** of the DAP assembly line (timelines for generating DAP outputs)
2. DAP assembly line **Quality** (completeness/quality of applicant submissions & City technical review)
3. **Consistency** of the DAP assembly line (Maintaining/Tracking ***Velocity*** + ***Quality*** across multiple DAP files at any given point in time)

DAP Assembly Line – LEAN Thinking in Action

Before measurement tools can be calibrated, the City needs to commit to desired results/outcomes. The figure below documents appropriate results statements around Dedicated Inputs, Standardized

Processes/Timeframes, and the leveraging of the AMANDA workflow tool to track DAP processing performance and generate accountability reporting to City staff, Council, applicants, and the community.

Desired DAP Performance Results

Dedicated DAP Staff Team Inputs:

Stable/adequate staffing capacity to process DAP applications (Dedicated Inputs)

Achieving:

Standardized/streamlined DAP processes meeting targeted City timeframes

Using

AMANDA Countdown Clock tracking/reporting on *Municipal Controllable File Processing Days*

The countable units of work that will form the backbone of DAP performance reporting are set out in the figure below. Pre-consults, Application submissions, Review Cycles and Post-Construction Inspections are the key outputs subject to target setting and reporting.

Core Planning/Eng. DAP Processing Outputs

1. ***Pre-consults*** *navigated forward to application submissions*
2. ***Application submissions*** *navigated forward to complete applications*
3. *Complete applications that move through* ***Technical Review Cycles*** *enroute to a municipal approval decision*
4. *Post-Construction* ***Inspections/Security Release Decisions***

All 4 of these DAP outputs are countable & measurable!

 # Pre-consult Understandings generated

 # Submitted applications navigated forward to Deemed Complete

 # Technical Review Cycles executed

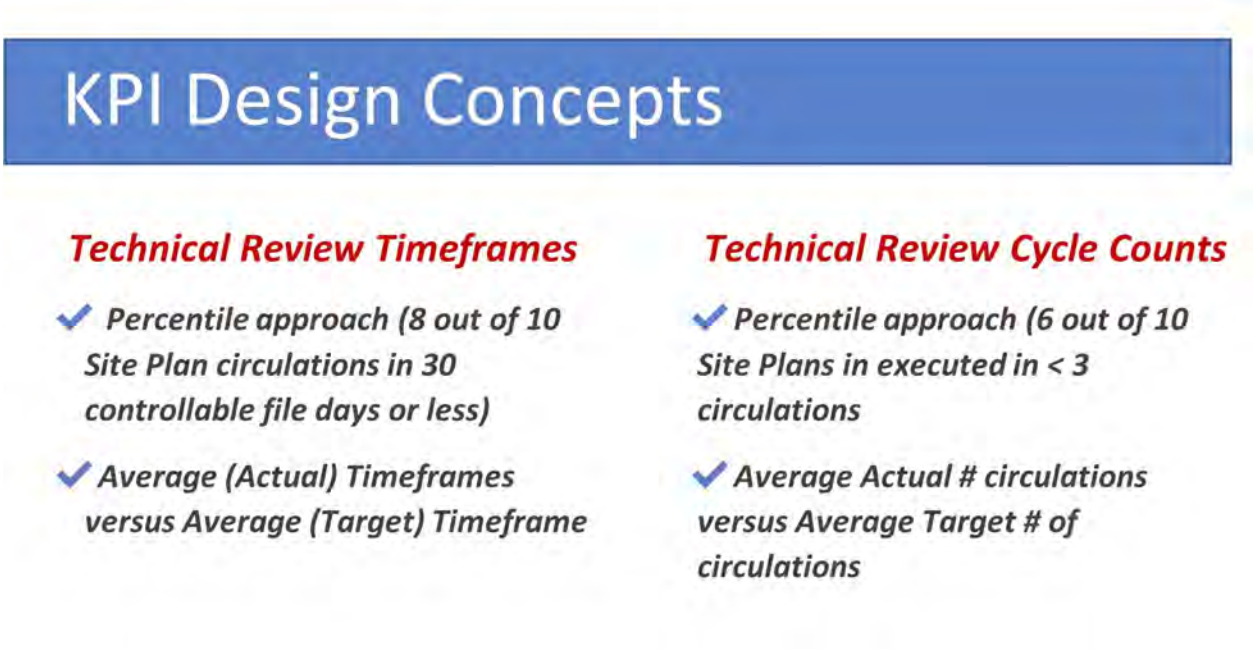
 # Inspections/Security release decisions executed

For Technical Review Cycle measurement, the key Design concepts are set out in the figure below.

Average actual timeframes can be compared to an Average Timeframe target. Timeframes would be measured in controllable file processing days. A percentile approach to targets is also useful. For

instance, what is the actual % of Technical Review Cycles/Circulations meeting a 30-day timeframe versus a target of 8/10 meeting that same 30-day timeframe target?

Similar measurement concepts can be applied to the number of Cycles/Circulations. The average number of required Cycles/Circulations for a file can be tracked and compared to a target number of Cycles/Circulations. A percentile approach could track the actual share of Site Plan files that required no more than 3 Cycles/Circulations and compare that actual share to a 6/10 target.



The following four figures (see below) set out specific Key Performance Indicators (KPIs) for pre-Consults, Applications, Technical Review Cycles, and Inspections/Security Release Decisions. These KPIs make use of the KPI Design Concepts already set out in this section of the Report.

"As Should Be" DAP KPIs

	Effectiveness (Quality) KPIs

Pre-consult	• Average # business days for an "As Should Be" Pre-consult Understanding to be provided to an applicant following the scheduled Pre-consult meeting
	  • Sorted by Planning Act categories + Detailed Engineering Reviews
	• % "As Should Be" Pre-consult Understandings processed in 10 business days or less
	  • Sorted by Planning Act categories + Detailed Engineering Reviews

Average measures speed

% hitting 10-day target measures consistency/ predictability

"As Should Be" DAP KPIs

	Effectiveness (Quality) KPIs	
Complete Applications 	• Average # business days for an application submission (clearing the Portal) to be considered complete/adequate for 1st Technical Review Cycle • % DAP applications (clearing the Portal) reviewed/considered ready for Technical Review Cycle #1 in 30 business days or less • Sorted by Planning Act categories + Detailed Engineering Reviews * For KPIs "complete" is defined as deemed "content suitable" for a 1st Technical Review Cycle	Average measures speed % hitting 30-day target measures consistency/ predictability
Technical Reviews 	• Average # business days for a 1st Technical Review Cycle (sorted by DAP application categories & complexity levels) • Average # business days for subsequent Technical Review Cycles to be executed (sorted by DAP application categories & complexity levels) • Average # Technical Review Cycles required to generate a decision on a given application (sorted by DAP application categories & complexity levels) • % Planning application 1st Technical Review Cycles completed in X business days or less (sorted by DAP application categories & complexity levels) • % Planning application subsequent Technical Review Cycles completed in X business days or less (sorted by DAP application categories & complexity levels) • % Post-Draft Plan Detailed Engineering Review Cycles completed in X business days or less (sorted by complexity levels)	Average measures speed % hitting business day targets measures consistency/predictability
Inspections/ Security Release Decisions 	• Average # business days for an Inspection to be executed after it is scheduled with the applicant • Average # business days to communicate a Security Release Decision to the applicant following a completed inspection • 8/10 Inspections executed in 30 business days of less • 9/10 Security Release Decisions communicated to the applicant within 10 business days of an inspection being executed	Average measures speed % hitting "batting average" target measures consistency/ predictability

Additional public results reporting can include measurement of DAP community benefits.

Annual Reporting of DAP Service Delivery Benefits

1. DAP will deliver $350M in new City infrastructure associated with the processing development applications on the Brant lands across 2021-2051 → DAP Benefit KPI = Annual $ value of transferred infrastructure to City via DAP execution
2. DAP will deliver estimated new construction worth > $7B on the Brant lands across 2021-2051 → DAP Benefit KPI= Annual $ value of new construction within City via DAP execution

10.2 DAP Scorecard and Accountability Reporting

Results Based Management (RBM) is a cyclical approach/model for achieving efficient and accountable municipal service delivery. The RBM cycle consists of Plan-Do- Check-Act components. DAP performance targets and a properly resourced delivery model define the "Plan" component. Consistent and dependable execution of mapped/measured processes define the "Do" component. The "Check" component involves the comparison of actual results (processing timeframes) against performance targets. Based on the "Check" information and conclusions the "Act" component involves performance target refinements, resourcing adjustments and/or process execution changes.

Results Based Management - A Cycle of Continuous Improvement

A modernized Brantford DAP model should feature an RBM cycle supported by KPI-derived performance targets. An annual KPI supported DAP performance Scorecard should be produced and publicly reported to foster transparent accountability. Annual budget decision making should be informed by the DAP Scorecard.

KPIs and DAP performance targets can be built out iteratively over a number of years. The figure below sets out a practical and achievable roadmap for a measurable/target driven DAP service in Brantford.

Roadmap to Build-out "As Should Be" KPIs Over Time

1. Rapidly secure necessary AMANDA modules
2. Configure AMANDA to deploy "MUST HAVE" DAP functionality (e.g., Countdown Clocks)
3. ALL DAP business units/staff commit to necessary AMANDA "feeding schedule"
4. Adopt initial "soft" KPI targets, uninformed by timeframe actuals not yet measured in AMANDA
   - Limited meaningful reporting (internal)
5. Year-1 KPI actuals from AMANDA subsequently used to firm up go-forward KPI targets
   - Meaningful reporting (internal + external)
6. Align KPIs & performance targets with future budget cycle decision making around Brant lands staffing levels

11.0 Recommendations: Strategic and Tactical plus a Rapid Implementation Roadmap

Recommendations have been informed by "As Is" DAP performance investigations and "As Should Be" opportunities for improvement. DAP best practice case studies developed by Performance Concepts/Dillon and the detailed Brantford DAP File Audit have also contributed to both Strategic and Tactical performance improvement recommendations.

11.1 Context for Rapid Implementation Roadmap - The Growth Race

The Performance Concepts/Dillon team always develops an Implementation Roadmap that is closely aligned with our Recommendations. In the case of Brantford, we have compressed the timeframes built into the Roadmap to reflect the DAP realities currently facing Brantford. The City is in a race to execute unavoidable modernization/restructuring of its DAP model to deal with the imminent infill + existing greenfield + Brant boundary lands tsunami of applications. The completion of the 9 block plans across the Brant boundary lands will generate an immediate spike in effort-intensive Subdivision, Site Plan and Detailed Engineering Review volumes. The City's area-specific Development Charge Background study confirms this imminent DAP workload spike. Both Strategic and Tactical Recommendations have been front-end loaded into a Rapid Implementation Roadmap in order to avoid the worst-case scenario of community planning being relegated to the OLT/LPAT by developers that have concluded (rightly or wrongly) that the City is unable or unwilling to invest in a timely/predictable DAP conveyor belt.

11.2 Do Now, Do Soon, Do Later

Do Now Recommendations within the Rapid Implementation Roadmap require action/execution within 6 months.

Do Soon Recommendations within the Rapid Implementation Roadmap require action/execution within 12 months.

Do Later Recommendations within the Rapid Implementation Roadmap require action/execution beyond 12 months.

Where more than one timeframe is referenced in the following section, the intention is to describe an implementation transition over time.

11.2.1 Revenue Stream Recommendations & Modernization Roadmap (See Section 7.1)

The following Strategic and Tactical Recommendations will ensure modernized/robust DAP revenue streams are in place to fuel a "Growth Pays for Growth" service delivery model that avoids unintended property tax subsidization of development industry applicants.

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S1	The City has not yet structured Planning/Engineering DAP as a full-cost recovery Enterprise business model like Building DAP. The activity-based costing justification for modernized DAP fees has not been undertaken.	Confirm and document the City's existing 90% "Growth Pays for Growth" Planning DAP Cost Recovery Target by Conducting a Full-cost DAP Fee Review.	Modernized full cost DAP fees will supply the sustainable revenue stream required to fund a robust City staffing model. That staffing model will, in turn, execute timely/consistent DAP processes meeting targeted timeframes. Fee adjustments can be phased in across a three-year period.	✓	✓	
S2	Current City revenue and Cost accounting/Budgeting structures do not document the true all-in costs of Planning/Engineering DAP.	Implement an Enterprise- style Revenue and Cost Accounting/Budgeting model for Planning DAP (linking Fee revenues to eligible DAP Cost centres).	Creates Enterprise cost recovery consistency across Development Planning, Development Engineering and Building service delivery channels	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T1	Peer municipal comparisons of DAP fee structures reveal Brantford's current "flat fee" structure for Multi-residential Site Plans does not reflect best practices in fee design	Modernize Site Plan Fee Design by adding a per-unit escalator to Multi-Residential Site Plans. Justify new escalator with supporting activity-based costing analysis.	A modernized Site Plan fee structure will improve fairness across simple and complex projects (with differences in unit counts acting as a proxy for complexity). The recommended DAP Fee Review will finalize the design details of the new Site Plan fee structure.	✓	✓	
T2	Peer municipal comparisons of DAP fee structures reveal Brantford's current "flat fee" structure for Commercial/Industrial Site Plans does not reflect best practices in fee design	Modernize Site Plan Fee Design by adding a GFA escalator to Commercial/Industrial Site Plans. Justify new escalator with supporting activity-based costing analysis.	A modernized Site Plan fee structure will improve fairness across simple and complex projects (with difference in GFA acting as a proxy for complexity)	✓	✓	
T3	Peer municipal comparisons document the reality that Brantford's current 5.5% Engineering Construction fee rate is below greenfield municipality norms	Adjust the rate for the City's Development Engineering % Construction Value Fee to 6% - thereby improving "fit" with peer growth municipalities.	Improved revenue generation will support a robust Development Engineering staffing model required for the upcoming spike in Subdivision Draft Plan applications & Post-Draft Plan Detailed Engineering Review Phases	✓		

11.2.2 Staffing & Resources Investment Roadmap (See Section 7.2)

Once DAP fee modernization is in place, robust staffing investments are required to modernize DAP and secure processing timeframes predictability. Failure to secure processing timeframe predictability will expose the City to a worst case "planning by OLT/LPAT" risk scenario.

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S3	Detailed DAP application volume/workload projections prepared by Performance Concepts justify a business case for an additional 10 FTE within the Development Engineering business unit.	Approve & Execute the Development Engineering *Staffing Business Case* set out in this Final Report.	The Development Engineering *Staffing Business Case* "ask" for 10 FTE will enable the City to approve/ on-board $335 M+ in required road, water, wastewater, and stormwater infrastructure. This fee supported staffing "ask" will have no property tax impact.	✓	✓	
S4	The current organizational alignment of Development Engineering in a different Department than Development Planning and Building is sub-optimal from a DAP performance perspective.	Implement *One Window* Organization Re-Design to integrate Development Planning, Development Engineering and Building business units within a single department.	Seamless alignment/coordination of Development Engineering within a new "all DAP" Commission will improve workflow performance and is consistent with the recommended *One Window* approach to governance reform achieved via a new DAP Committee of the Whole (COW).	✓	✓	

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S5	Brantford's finite DAP staffing capacity is being consumed by extensive "pre Pre-Consult" exploration discussions that properly fall within the purview of Economic Development in most Greater Golden Horseshoe growth municipalities. This support model for supporting exploratory development enquiries from smaller Brantford development community actors is not sustainable given the impending spike in DAP workload facing the City.	Brantford should establish a development facilitation Concierge position within the Economic Development division, to support small builder/developers and free up DAP staff for their core review function.	The City's finite DAP staffing capacity will be freed-up to focus on serious/formal DAP applications poised to move forward, while proponents requiring pre-DAP exploratory support will be routed to an appropriate/qualified Economic Development concierge who will support the "pre Pre-Consult" dialogue.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T4	Performance Concepts/Dillon has independently reviewed City staff's proposed staffing upgrades required to generate additional Planning DAP processing hours to meet the impending infill and greenfield applications/workload spike.	Approve & Execute the Development Planning *Staffing Business Case* set out in this Final Report • New staffing model to consist of 4 Senior Planners, 2 Intermediate Planners, 2 Junior Planners + administrative a non-Planner coordinator for the Committee of Adjustment	The Development Planning *Staffing Business Case* will reduce the risk of undemocratic "planning by OLT" by ensuring stable/predictable application processing times that meet City timeframe targets.	✓	✓	
T5	AMANDA modernization / "As Should Be" workflow re-configuration is urgently required to meet the flow and sequencing challenges associated with the imminent spike in DAP application volumes/workload.	Deploy a new AMANDA Configuration & Training Senior Analyst	In combination with transitional AMANDA contractor expertise, the new AMANDA Senior Analyst will ensure Brantford wins the AMANDA configuration/preparation race with the DAP applications workflow spike. The recommended new Senior Analyst can in-turn train new staff super-users as required.	✓	✓	

11.2.3 DAP Conveyor Belt Process Streamlining & Technology Modernization (See Section 7.3 and Section 8.3)

Modernized DAP revenue streams that have fueled robust staffing investments will position the City to execute the following recommendations to streamline the end-to-end DAP delivery channel.

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S6	Expanded delegation of DAP approvals by Council to staff is a necessary processing efficiency to meet the challenge of the imminent applications spike. In the absence of expanded delegation additional staffing investments beyond those recommended in this Final Report will be required to ensure processing timeframes remain stable	Modernize DAP Governance – Expand Council Delegation of Approvals to Staff as per the October 2021 staff report to the Building Construction Process Review Taskforce	City staff processing capacity currently consumed by writing effort-intensive Council reports can be redeployed to technical review/approval of Site Plans and other delegated application categories. Estimated processing timeframe reductions of 2-3 months per file will be secured via expanded delegation. Relatively infrequent contentious files can still be escalated for Council consideration if absolutely required.	✓		
S7	Brantford's Committee of Whole governance model is not configured to deal with the new growth realities. Impending DAP applications volume spike will create unsustainable governance choke points in the current COW model.	Modernize City Governance model to meet DAP challenges – Create a new Committee of the Whole (COW) devoted exclusively to Planning/Engineering DAP, Planning Policy and Building	Will secure/protect adequate Decision-Making Bandwidth for Council to deal with the imminent spike in DAP applications. Will avoid decision-making choke points & reduce the risk of undemocratic "planning by OLT".	✓	✓	

#	*As Should Be* Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S8	Currently the overlapping processing of Planning/Engineering DAP files is not subject to stringent business rules defined by process trigger points. Both Planning and Building staff support AMANDA based coordination of overlapping processes.	Use AMANDA to document the specific processing triggers needed to coordinate the overlapping back-end of Planning/ Engineering DAP Subdivision, Site Plan and Minor Variance files with the front-end of Building permit Applications/Permit issuance	Using AMANDA to regulate/manage an orderly coordination of overlapping Planning/Engineering/ Building DAP processes will reduce the risk of processing errors/breakdowns in the imminent high volumes growth environment facing Brantford	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
		Pre-Consultation				
T6	The DAP file audit has demonstrated that a streamlined Pre-Consultation letter for simple/straightforward files can sometimes replace the Pre-consult meeting with applicants. This effort-saving process innovation will free-up staff capacity for other high value-added priorities.	While a Pre-consultation meeting is the default process requirement, the City should make use of a discretionary pre-consultation "results letter" for straight-forward applications that may not require a meeting. • The letter must provide a complete set of comments from all City departments, including identification of required studies and application submission items, as well as contact information specific to each department. • All communications between departmental contacts and the applicant must be shared with the File Planner for coordination purposes.	This effort-saving process innovation will free-up City staff capacity for other more complex Pre-consult meetings/files. Capacity will be at a premium in the impending high volumes environment facing Brantford.	✓		
T7	The DAP file audit has demonstrated that Pre-consultation meetings require improved focus on contentious issues as opposed to routine matters.	Refocus the DRC Pre-consult meeting towards discussion of comments that are likely to be contentious or have an impact on other technical disciplines present, or which have the potential to imply the need for revisions to multiple aspects of the proposal.	Improved Pre-Consultation performance will yield downstream efficiencies in the review and processing of complete/higher quality DAP application packages.	✓		

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T8	The DAP file audit has demonstrated that comments/checklists developed after Pre-consultation meetings should be consolidated to improve efficiency/consistency.	Issue a single, consolidated set of Pre-consultation staff comments, rather than the current approach of issuing both Preliminary and Final comments to the applicant.	Improved Pre-Consultation performance will yield downstream efficiencies in the review and processing of complete/higher quality DAP application packages.	✓		
T9	Best practices in GTA greenfield municipalities require applicants to acknowledge in writing the complete application submission requirements agreed to in a Pre-consultation meeting.	Create a formalized Pre-Consultation Understanding w/Applicants (featuring mandatory electronic acknowledgement by applicants to subsequently submit a complete application over the new DAP Portal).	A formalized Pre-Consultation Understanding will create accountability for the City and applicants as they move forward with submission of application packages across a new DAP online portal.	✓	✓	
T10	The current practice of using DRC meetings to deal with both Pre-Consults and actual DAP files will not be sustainable once the imminent spike in applications occurs. Existing DRC meeting bandwidth/capacity will be overloaded by new workload.	Create a new “Pre-Consults Only” set of scheduled DRC meetings to deal with the expected volume spike in development applications associated with imminent growth	A stream of “Pre-Consult Only” DRC meetings will protect the bandwidth/capacity of existing DRC meetings to deal with matters of substance associated with actual DAP applications.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T11	Growth municipality best practices require a 24/7 DAP online portal that can screen out incomplete application submissions. Brantford does not yet have a robust DAP portal to generate this kind of submission quality control functionality or 24/7 convenient customer service.	Implement a Portal/AMANDA solution to integrate the new electronic Pre-Consultation Understanding with a complete application submission over the Portal. Filter-out incomplete application submissions using the Portal as an impartial quality control tool.	A portal/AMANDA solution will filter-out incomplete application submissions using the Portal as an impartial quality control tool. This quality control functionality will reduce application completeness gaps and ensure staff focus their finite processing effort on higher quality submissions.		✓	✓
T12	Post-Draft Plan Detailed Engineering submissions do not benefit from the quality control rigour/efficiencies generated by the mandatory Pre-consultation model attached to Planning applications. Submission gaps/quality control problems are only discovered/addressed during the 1st Technical Review Cycle.	Implement a formal Pre-Consultation model for the Post-Draft Plan Detailed Engineering Review. Mirror the recommended Planning applications approach/process by creating a Pre-Consult Understanding.	As is the case with Planning applications, a formal Pre-Consultation model for Post Draft Plan Detailed Engineering submissions will improve quality/completeness, reduce the length of 1st Technical Review Cycles, and reduce the overall number of required Technical Review Cycles.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T13	Recommended Pre-consultation "As Should Be" processes/ timeframes/applicant obligations are not documented in a Pre-Consultation By-law	Draft and implement a Pre-Consultation By-law that defines procedural timelines and complete application submission requirements.	Improved documentation of "As Should Be" Pre-Consultation model in a By-law should add legitimacy/accountability to the new model within the development industry		✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
		Application Processing				
T14	The City selectively applies a 2-step completeness/ adequacy check for some DAP application categories prior to applications being Deemed Complete. This effective quality control approach should be extended to all DAP applications – most notably Site Plans.	Implement a 2-step QA Process for the "Application Submitted to Deemed Complete" component of all DAP files. • The City's existing "shallow-dive" submission adequacy review (Step 2) should also be applied to all Post-Draft Plan Detailed Engineering Review phases moving forward.	Extending the 2-step submission completeness/adequacy check across all DAP applications + Detailed Engineering Review phases will improve the effectiveness of Technical Review Cycles – shorter cycles and fewer cycles will result.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T15	Site Plans are not subject to the Planning Act "deemed complete" legal decision by the City so they cannot be refused at the application submission stage. However, "inadequate" applications can be processed in a different stream without guaranteed timeframe targets.	Exclude Site Plan applications deemed "inadequate" from the City's self-imposed processing timeframe service levels/targets. • Inadequate applications only to be processed "off the clock" once application quality gaps corrected. Will only receive a best-available-effort processing commitment.	Removing low quality/inadequate Site Plan applications from the normal stream of applications (with timeframe targets) will create an incentive for applicants to meet the quality commitments imbedded in the new (mutually agreed upon) Pre-Consultation Understanding. Site Plan application quality will improve over time as applicants seek to avoid the slower "best available effort" stream with no timeframe countdown clock.		✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T16	Improved/standardized formatting of Complete Application checklist requirements across different DAP application submissions will help streamline/standardize staff's review effort across the various Technical Review Cycles for a given application.	For projects involving multiple applications, City staff should clearly indicate which submission checklist requirements correspond with each distinct application. • Specifically, the submission checklist requirements should be segregated by separate application category for combo-packs of Site Plans, Re-zonings, Subdivisions, Condos. • This sorting of application submission requirements should be organized in a tabular/matrix format. Submission requirements to be listed in rows and application categories appearing in columns. A simple checkmark or other symbol to be used to indicate the applicability of each submission requirement pertaining to each application category.	Standardized formatting will contribute to more efficient execution of each Technical Review Cycle – an incremental reduction in cycle length should result over time.	✓	✓	

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T17	Improved/standardized formatting of Technical Review Cycle comments/approval conditions will help streamline the execution of Technical Review Cycles for a given application.	All staff Technical Review Cycle comments and approval conditions should be tracked by the City using unique identifiers (e.g., numbering) and provided to the applicant in the form of a standardized comment response matrix. • Likewise, applicants should be required to clearly indicate which comment or condition they are responding to by referencing the same unique numeric identifier as part of resubmission documentation. Applicants should respond directly within the same comment response matrix provided by the City.	Standardized formatting/numeric coding will contribute to more efficient execution of each Technical Review Cycle – an incremental reduction in cycle length should result over time.	✓	✓	
T18	Incremental process improvement opportunities in DRC meetings were documented during the Dillon file audit exercise executed as part of this DAP review.	City staff should Update the presentation template used in DRC meetings to review specific applications. • Include introductory slides that summarize key information (i.e., type of application, key dates, and applicant updates/ conversations to date).	Incremental improvements in the execution of DRC meetings will expand the capacity to deal with more applications per DRC meeting.	✓		

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
Processing Timeframes						
T19	1st Technical Review Cycles tend to be longer/more effort intensive than Subsequent Review Cycles. It is not appropriate to inflexibly apply a single timeframe target to all Review Cycles given this reality.	Create differential processing timeframe KPIs and Targets for the 1st Technical Review Cycle vs Subsequent Review Cycles.	Differential Technical Review Cycle timeframe targets will help the City to address higher volumes/complexities associated with the expected simultaneous spikes in infill and greenfield DAP applications		✓	✓
T20	Site Plan timeframe targets should be informed by actual measured timeframes documented by AMANDA countdown clock functionality. Initial targets can/should be revised to reflect actual performance and on-the-ground staff resourcing realities.	Establish an initial Target timeframe for Site Plan Technical Review Cycle #1 at 30 controllable business days. Establish an initial Target timeframe for subsequent Site Plan Technical Review Cycles at 20-25 controllable business days based on a complexity designation by staff.	Timeframe targets supply development industry applicants with stable/accountable estimates of DAP approvals – critical information to manage project cashflow and design/construction supply chains. Timeframe targets supply Council and staff with critical decision support data to inform budget cycles, staffing decisions and IT modernization upgrades.		✓	✓

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T21	Draft Plan of Subdivision timeframe targets should be informed by actual measured timeframes documented by AMANDA countdown clock functionality. Initial targets can/should be revised to reflect actual performance and on-the-ground staff resourcing realities.	Establish an initial Target timeframe for Subdivision Technical Review Cycle #1 at 35 controllable business days. Timeframe targets for Complex files can be adjusted based on a designation by staff. Establish Target timeframe for subsequent Subdivision Technical Review Cycles at 30 controllable business days. Timeframe targets for Complex files can be adjusted based on a designation by staff.	Timeframe targets supply development industry applicants with stable/accountable estimates of DAP approvals – critical information to manage project cashflow and design/construction supply chains. Timeframe targets supply Council and staff with critical decision support data to inform budget cycles, staffing decisions and IT modernization upgrades.		✓	✓

#	*As Should Be* Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T22	Post-Draft Plan Detailed Engineering Review timeframe targets should be informed by actual measured timeframes documented by AMANDA countdown clock functionality. Initial targets can/should be revised to reflect actual performance and on-the-ground staff resourcing realities.	*Establish Target timeframe for Detailed Engineering Review Cycle #1 at 30-35 controllable business days.* • Timeframe targets for Complex files can be adjusted based on a designation by staff. *Establish Target timeframe for Subsequent Detailed Engineering Review Cycles at 30-35 controllable business days.* • Timeframe targets for Complex files can be adjusted based on a designation by staff.	Timeframe targets for Detailed Engineering Review Cycles supply development industry applicants with stable/accountable estimates of lot registration and Building permit application/issuance dates – critical information to manage project cashflow and construction supply chains. Timeframe targets supply Council and staff with critical decision support data to inform budget cycles, staffing decisions and IT modernization upgrades.		✓	✓

#	*As Should Be Finding*	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
Engineering Review and Post-Construction Inspections						
T23	The DAP greenfield approvals model features complicated coordination/sequencing challenges during the Post-Draft Plan phase of infrastructure approvals that culminate in the creation of registered lots. Brantford has struggled to optimize the sequencing of Engineering design approvals, Ministry of the Environment approvals, and early servicing arrangements.	Use AMANDA "drawbridge" functionality to Improve coordination of Post-Draft Plan Detailed Engineering Review, Ministry of the Environment Approvals, and a new/formal Early Servicing Agreement. • Detailed Engineering Review Cycles (design approval) to be completed and Ministry of Environment Approvals to be in place, prior to final execution of new Early Servicing Agreement.	Using AMANDA to sequence/coordinate Post-Draft Plan greenfield approvals will reduce the risk of the City approving/ onboarding sub-standard infrastructure. Proper sequencing will also eliminate choke points/delays in the overlapping baton handoff from Engineering DAP to Building DAP.		✓	✓

#	*As Should Be Finding*	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T24	Inefficient post-construction clearance of Development Agreement Conditions (Subdivision or Site Plan) cannot be sustained once the imminent development applications spike occurs. A new "As Should Be" process organized around seasonal timeframe realities and clearly documented processing timeframe requirements will be essential to meet the realities of the upcoming spike in application volumes and the subsequent inspection workload.	Restructure delivery of Post-Construction Inspections and Security Release based on a May 1st to Oct 31st annual season, thereby creating a necessary blackout period across the remainder of the calendar year. • Deliver Inspections within 30 business days of confirmed scheduling with applicants. • Deliver the City's Security Release Decision within 5 business days of executed Inspections.	Applicants and staff will be guided by the clear and accountable business rules and timeframes for securing Condition Clearance and Securities Release. The City will be able to execute these responsibilities with a reasonable staffing investment if the new model is understood and adhered to by development industry applicants.		✓	✓

11.2.4 Roadmap to Build a Results Based Scorecard & Culture of Accountability (Section 10)

Measuring and reporting DAP results is critically important for service delivery execution and accountability. DAP measurement tools and performance targets will require an updated/modernized AMANDA workflow tool configuration. City leadership will also need to champion a DAP culture of accountability, where all City staff/business units commit to timely data population of AMANDA and utilize AMANDA reports/prompts as the central nervous system for navigating the upcoming tsunami of files that are going to be moving across the DAP conveyor belt.

#	As Should Be Finding	Strategic Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
S9	Measuring timeframes and establishing measurement informed timeframe targets is critical to transforming DAP and meeting the imminent challenges of simultaneous infill and greenfield growth in Brantford.	Commit to this Report's 6-Step Roadmap to establish Key Performance Indicators (KPIs) and DAP Performance Targets that are integrated into the annual budget decision-making cycle	KPIs populated via AMANDA will supply data/evidence to inform target setting and manage actual DAP results. Targets reflecting actual results will drive continuous improvement and provide certainty/predictability for development industry applicants. The risk of industry players opting for "planning by OLT" approaches will be significantly reduced.		✓	✓
S10	Accountability tools that transparently report actual DAP results against DAP timeframe targets should be designed/adopted to drive ongoing DAP performance improvements.	Implement an Annual DAP Public Performance Scorecard and incorporate KPI data into an ongoing annual Plan–Do–Check–Act cycle of service delivery execution/continuous improvement	Transparent public target setting and results reporting will drive DAP continuous improvement and provide certainty/predictability for development industry applicants.		✓	✓

#	As Should Be Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T25	AMANDA needs to function as the City's "central nervous system" of DAP workflow planning/tracking/reporting. AMANDA configuration requires all City staff involved in DAP to be AMANDA literate and committed to daily data tracking within AMANDA to ensure effective workflow management actually happens.	Configure AMANDA to produce required DAP processing timeframe data flows to populate the portfolio of KPIs put forward in this Report	AMANDA configuration will supply the business intelligence linchpin required to modernize DAP workflows and secure a results-based approach to continuous improvement.		✓	✓
T26	Once DAP timeframe tracking has been operationalized in AMANDA the City can/should commit to timeframe targets imbedded in accountability documents.	The City should establish Council approved timeframe target MOUs for the key Planning DAP application categories, Post-Draft Plan Detailed Engineering Review phases, and Post-Construction Inspections/Security Release Decisions • Timeframe MOUs to be endorsed by all City business units participating in DAP, posted on the City website, and shared with Development Industry/ Applicants at Pre-Consult sessions	Transparent DAP timeframe accountabilities will ensure the City staffs DAP appropriately to achieve its MOU commitments and meets the processing timeframe challenges inherent in simultaneous infill and greenfield application volumes spikes.		✓	✓

#	As Should Be Finding	Tactical Recommendations	Expected Benefits	DO NOW	DO SOON	DO LATER
T27	DAP applicants and the public should be provided with high-level information about the progress of applications across the various approvals channels.	Configure new DAP Portal to provide Applicants/Public with a viewing lens to track application processing milestones progress and timeframe target achievement	Portal based public access to application status/progress the across DAP channel in-progress timeframes versus targets) is consistent with a City MOU commitment to DAP targets and transparent accountability reporting.			✓

12.0 Conclusions & Moving Forward with Change

12.1 3rd Party Assessment

Implementation and execution service delivery transformation is always challenging. It requires focus and perseverance.

Performance Concepts recommends a 3rd party implementation progress assessment in Q1 of 2023. This progress evaluation will compare actual implementation of the Roadmap against the *Do Now* & *Do Soon* recommended timeframes in this Final Report.

Remedial actions will be recommended (if required) to keep/get implementation on-track as Brantford transitions through *Do Now* and *Do Soon* change driven action items.

12.2 DAP Modernization/Performance Improvement: Measurement Lenses to Consider

The DAP performance challenges facing Brantford moving forward are focused on capacity building, process streamlining and IT platform modernization. Therefore cost reduction/cost avoidance is not a helpful lens for measuring the performance improvement dividend that can be secured by implementing the recommendations contained in this Report.

DAP performance improvement is best considered via an alternative lens that is consistent with LEAN thinking principles that focus on managing turnaround/through-put timeframes. A LEAN improvement lens that measures turnaround/through-put times is consistent with industrial/manufacturing analogy of a DAP conveyor belt producing a series of “black box” application approval products. This performance lens is also consistent with the Province’s mandated “no municipal decision” timeframes that can trigger an OLT/LPAT appeal by applicants.

Performance Concepts estimates that successful implementation of the “As Should Be” recommendations advanced in this Report will stabilize turnaround times at/below existing levels (for the planned/predictable annual volume of applications associated with the Area Specific DC Background Study). The community benefit associated with Recommended DAP improvements can be measured using the following metrics:

Annual Reporting of DAP Service Delivery Net New Benefits

1. DAP will deliver $350M in new City infrastructure associated with the processing development applications on the Brant lands across 2021-2051 → DAP Benefit KPI = Annual $35M value of transferred infrastructure to City via DAP
2. DAP will deliver estimated new construction worth $6 to $7B on the Brant lands across 2021-2051 → DAP Benefit KPI= Annual Estimated $216M value of new construction within City via DAP

This modernized DAP efficiency dividend (estimate) is informed by the 30+ DAP reviews executed across Canada by Performance Concepts/Dillon since 2006.

Appendix A

Detailed DAP File Audit

Detailed File Audit Table for Site Plan Control and Draft Plan of Subdivision Applications

Application Type	File	Processing Timelines *(from first submission to Final Approval)*	Number of Submissions	Adherence to Established Business Processes	Continuity of Staff	Use of AMANDA
Site Plan Control	Site Plan A (SPC-37-19)	9 months	6 total	• Pre-Consultation through to Final Approval adhered to process flowchart • Draft conditions issued for information after second submission • Conditional approval followed by final approval; timeline subject to the applicant's response	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff
Site Plan Control	Site Plan B (SPC-47-19)	14 months	3 total	• Pre-Consultation through to Final Approval adhered to process flowchart • Conditional approval followed by final approval, timeline subject to the applicant's clearance of conditions • Application processing timeline to Conditional approval was efficient and completed in approximately 4 months	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff

Application Type	File	Processing Timelines *(from first submission to Final Approval)*	Number of Submissions	Adherence to Established Business Processes	Continuity of Staff	Use of AMANDA
Site Plan Control	Site Plan C (SPC-40-18)	14 months	5 total	• Pre-Consultation through to Final Approval adhered to process flowchart • Official Plan and Zoning By-law Amendment Application approvals completed first; outstanding comments remained at the first submission for SPC, therefore requiring a higher volume of technical comments at the second submission stage	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff
Site Plan Control	Site Plan D (SPC-18-16)	2 years	5 total	• General adherence to prescribed process throughout application • All technical comment circulations were completed in a timely manner; applicant resubmission timelines varied • A report for the Removal of Holding zone was considered for Council adoption following the applicant entering in a SPC Agreement with the City and providing necessary securities	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff

Application Type	File	Processing Timelines *(from first submission to Final Approval)*	Number of Submissions	Adherence to Established Business Processes	Continuity of Staff	Use of AMANDA
Site Plan Control	Site Plan E (SPC-44-19)	9 months	3 total	• General adherence to process throughout application • The applicant made the submission for SPC immediately following Zoning By-law Amendment Approval which may have allowed for continuity of technical City review staff and increased familiarity with the proposed development • The applicant prepared a comment response table with direction to specific drawings in each submission which supported staffs review of the revised materials	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff
Site Plan Control	Site Plan F (SPC-22-20)	9 months	3 total	• General adherence to prescribed process throughout application • The applicant prepared a comment response table with detailed responses to each comment which supported staff review of the revised materials • City staff prepared a redlined Site Plan for the applicant to review and revise	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff
Draft Plan of Subdivision	Subdivision A (29T – 17502)	2 years (1 phase per year)	2 total	• General adherence to prescribed process throughout application • Conditions and Draft Approval given in two phases • Conditions tracking by applicant shared with the City which appeared to reduce the timing to receive final approval	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff • Some use of AMANDA by Development Engineering

Application Type	File	Processing Timelines *(from first submission to Final Approval)*	Number of Submissions	Adherence to Established Business Processes	Continuity of Staff	Use of AMANDA
Draft Plan of Subdivision	Subdivision B (29T – 18502)	1.5 years	2 total	• General adherence to prescribed process throughout application • Related Zoning By-law Application was run concurrently; Zoning By-law Approval was received first	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff • Some use of AMANDA by Development Engineering
Draft Plan of Subdivision	Subdivision C (29T – 18503)	1 year	1 total	• General adherence to process throughout application • Mid-process step of resubmission was delayed due to applicant response time	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff • Some use of AMANDA by Development Engineering
Committee of Adjustment	Consent A (B06-2021)	3 months	1 total	• General adherence to process throughout application • Applicants use of application requirements checklist aided in technical comments input and package review	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff

Application Type	File	Processing Timelines *(from first submission to Final Approval)*	Number of Submissions	Adherence to Established Business Processes	Continuity of Staff	Use of AMANDA
Committee of Adjustment	Consent A (B10-2019)	4 months	2 total	• General adherence to process throughout application • Application was not complete in addressing all technical comments that were received in two batches that resulted in a deferral • Applicant and staff has continuous communication	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff
Committee of Adjustment	Minor Variance A (A32-2019)	1 year (2 months to refusal; LPAT decision 8 months later)	1 total	• General adherence to process throughout application • Following Committee's refusal decision, the applicant appealed the decision	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff
Committee of Adjustment	Minor Variance B (A06-2020)	7 months	2 total	• General adherence to process throughout application • Applicants time between submissions and to address timelines was approximately 5 months, likely due to the number of revisions required on the drawings	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff
Committee of Adjustment	Combined Consent and Minor Variance A (B28-2019 & A28-2019)	2 months	2 total	• General adherence to process throughout application • Applicant received provisional approval on the consent application and the minor variance was not approved	• The same staff member was on the file from submission receipt to approval	• No evidence of use of AMANDA by Planning staff