

# Town of Halton Hills Planning Fees Review

Incomplete Draft – For Discussion Purposes

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# 1. Introduction

## 1.1 Background

Planning application fees imposed by the Town of Halton Hills (Town) were last updated in 2011 for the 2012-2016 period. In 2017, Watson & Associates Economists Ltd. (Watson), was retained by the Town to assess the full costs of processing development planning applications and to make recommended changes to the Planning and Sustainability fee structure within the Town. Since the 2011 fee review, there have been changes in the Town's approval processes such as greater pre-application consultation and increased public consultation and community engagement. In addition, the Town has experienced an increase in the complexity and scale of applications including those concerning infill development. These changes have necessitated the need to re-assess the Town's planning application fees.

A planning fees review will also support the Town in determining a cost recovery budget/policy framework that balances the interest of new and existing development, and creates a pathway towards fiscal sustainability. Also, a full cost recovery fee review will ensure the Town achieves/maintains legislative compliance with Section 69 of the *Planning Act*, which established fee provisions limiting cross-subsidization of anticipated processing costs across application categories and fees. In this regard, the review will be useful in providing an evidence-based defense around any potential future planning application fee appeals to the Ontario Municipal Board (O.M.B.).

This study reviews all planning application fees, including Committee of Adjustment (C.O.A.) application fees. The primary objectives of the study are to:

- Review Town's current planning application fees and determine historical level of cost recovery;
- Determine full cost recovery fees;
- Recommend new fees and fee structure improvements that:
  - are defensible and conform with legislation;
  - balance the Town's need to maximize cost recovery with stakeholder interests, affordability, and competitiveness;
  - reflect industry best practices; and
  - considers the administrative implementation of fees
- Consider implementation of additional fees for service.

This technical report summarizes the legislative context for the fees review, provides in detail, the methodology utilized to assess the full costs of processing planning applications, and presents the full costs of service and recommended fee schedule.

## 1.2 Study Process

Set out in Table 1-1 is the project work plan that has been undertaken in the review of the Town's planning fees.

**Table 1-1**  
**Planning Fees Review Study Work Plan**

<i><b>Work Plan Component</b></i>	<i><b>Description</b></i>
1. Project Initiation and Orientation	<ul style="list-style-type: none"> <li>Project initiation meeting with Project Team to review project scope, work plan legislative context, fee review trends, A.B.C. full cost methodology and refinements to fee categorization and service delivery</li> </ul>
2. Review Background Information	<ul style="list-style-type: none"> <li>Review of cost recovery policies, by-laws, 2011-2016 cost recovery performance and application patterns</li> <li>Establish municipal comparators</li> </ul>
3. Municipal Policy Research and Municipal User Fee Comparison	<ul style="list-style-type: none"> <li>Municipal development fee policy research regarding development fee structures and implementation policies</li> <li>Prepare municipal comparison survey for municipalities and fees identified in Task #2</li> </ul>
4. Development Fee Application Processing Effort Review	<ul style="list-style-type: none"> <li>Meetings with Project Team members to review and refine fee design parameters and establish costing categories</li> <li>Working sessions to review established costing categories with regard to processing distinctions by application type.</li> <li>In collaboration with Town staff, develop process maps for categories/processes established through these discussions.</li> </ul>
5. Design and Execution of Direct Staff Processing Effort Estimation	<ul style="list-style-type: none"> <li>Town staff conducted effort estimation workshops with participating divisions and sections to collect processing effort estimates</li> <li>Process maps were populated by Town staff and reviewed with each of the departments to establish effort estimation data reflecting established processes</li> <li>Effort estimates were examined to quantify and test overall staff capacity utilization (i.e. capacity analysis) for reasonableness</li> </ul>
6. Develop A.B.C. model to determine the full costs processes	<ul style="list-style-type: none"> <li>Develop Town's A.B.C. model to reflect the current cost base (i.e. 2017\$), fee costing categories, direct and indirect cost drivers, and full cost fee schedule generation</li> </ul>
7. Calculation of Full Cost Recovery Fees and Financial Impact Analysis	<ul style="list-style-type: none"> <li>Modeled costing results were used to generate full cost recovery fee structure options</li> <li>Full cost recovery fee structure calculated and compared to Halton Region municipal comparators in consultation with the Project Team</li> <li>Recommended fee structure developed to increase costs recovery levels while maintaining market competitiveness</li> <li>Overall financial impact and planning fee structure impact analysis was undertaken</li> </ul>

<i>Work Plan Component</i>	<i>Description</i>
	<ul style="list-style-type: none"> <li>• Provided impact analysis for sample development types and for municipal comparators</li> <li>• Draft fee structure and findings presented to the Town's Senior Management Team</li> </ul>
8. Draft Report	<ul style="list-style-type: none"> <li>• Preparation of Draft Report</li> <li>• Presentation of findings to Council</li> </ul>
9. Development Industry Stakeholder Consultation	<ul style="list-style-type: none"> <li>• Study results presented to development industry stakeholders</li> </ul>
9. Final Report	<ul style="list-style-type: none"> <li>• Final Report and Proposed Fee Schedules prepared for Council consideration</li> </ul>

### 1.3 Legislative Context for Fees Review

The context for the fees review is framed by the statutory authority available to the Town to recover the costs of service. The *Planning Act*, 1990 governs the imposition of fees for recovery of the anticipated costs of processing planning applications. The following summarizes the provisions of this statute as it pertains to application fees.

Section 69 of the *Planning Act*, allows municipalities to impose fees through by-law for the purposes of processing planning applications. In determining the associated fees, the Act requires that:

The council of a municipality, by by-law, and a planning board, by resolution, may establish a tariff of fees for the processing of applications made in respect of planning matters, which tariff shall be designed to meet only the anticipated cost to the municipality or to a committee of adjustment or land division committee constituted by the council of the municipality or to the planning board in respect of the processing of each type of application provided for in the tariff.

Section 69 establishes many cost recovery requirements that municipalities must consider when undertaking a full cost recovery fee design study. The Act specifies that municipalities may impose fees through by-law and that the anticipated costs of such fees must be cost justified by application type as defined in the tariff of fees (e.g. Subdivision, Zoning By-Law Amendment, etc.). Given the cost justification requirements by application type, this would suggest that cross-subsidization of planning fee revenues across application types is not permissible. For instance, if Site Plan application fees were set at levels below full cost recovery for policy purposes this discount could not be funded by Subdivision application fees set at levels higher than full cost recovery. Our interpretation of the Section 69 is that any fee discount must be funded from other general revenue sources such as property taxes.

The legislation further indicates that the fees may be designed to recover the “anticipated cost” of processing each type of application, reflecting the estimated costs of processing activities for an application type. This reference to anticipated costs represents a further costing requirement for a municipality. It is noted that the statutory requirement is not the actual processing costs related to any one specific application. As such, actual time docketing of staff processing effort against application categories or specific applications does not appear to be a requirement of the Act for compliance purposes. As such our methodology, which is based on staff estimates of application processing effort, meets with the requirements of the Act and is in our opinion a reasonable approach in determining anticipated costs.

The Act does not specifically define the scope of eligible processing activities and there are no explicit restrictions to direct costs as previously witnessed in other statutes. Moreover, recent amendments to the fee provisions of the Municipal Act and Building Code Act are providing for broader recognition of indirect costs. Acknowledging that staff effort from multiple departments is involved in processing planning applications, it is our opinion that such fees may include direct costs, capital-related costs, support function costs directly related to the service provided, and general corporate overhead costs apportioned to the service provided.

The payment of *Planning Act* fees can be made under protest with appeal to the O.M.B. if the applicant believes the fees were inappropriately charged or are unreasonable. The O.M.B. will hear such an appeal and determine if the appeal should be dismissed or direct the municipality to refund payment in such amount as determined by the Board. These provisions confirm that fees imposed under the *Planning Act* are always susceptible to appeal. Unlike other fees and charges (e.g. Development Charges) there is no legislated appeal period related to the timing of by-law passage, mandatory review period or public process requirements.

The *Building Better Communities and Conserving Watersheds Act, 2017* (Bill 139) received royal assent on December 12, 2017 and is anticipated to be proclaimed into force on April 3, 2018. Bill 139 fundamentally changes the planning appeal system in Ontario by introducing significant amendments to the *Planning Act* and other legislation including replacing the O.M.B. with the Local Planning Act Tribunal (L.P.A.T.). At the time of writing, the proposed regulation has not yet been finalized and the new L.P.A.T. rules have not yet been published. Potential changes in legislation have not been reflected in the planning processes, and to the extent that changes are required in the underlying application review processes, the fees may need to be reconsidered.

Moreover, once finalized, the implications of the new planning regime will need to be considered with regard to the rules surrounding appeals to planning applications.

## **2. Activity Based Costing Methodology**

### **2.1 Methodology**

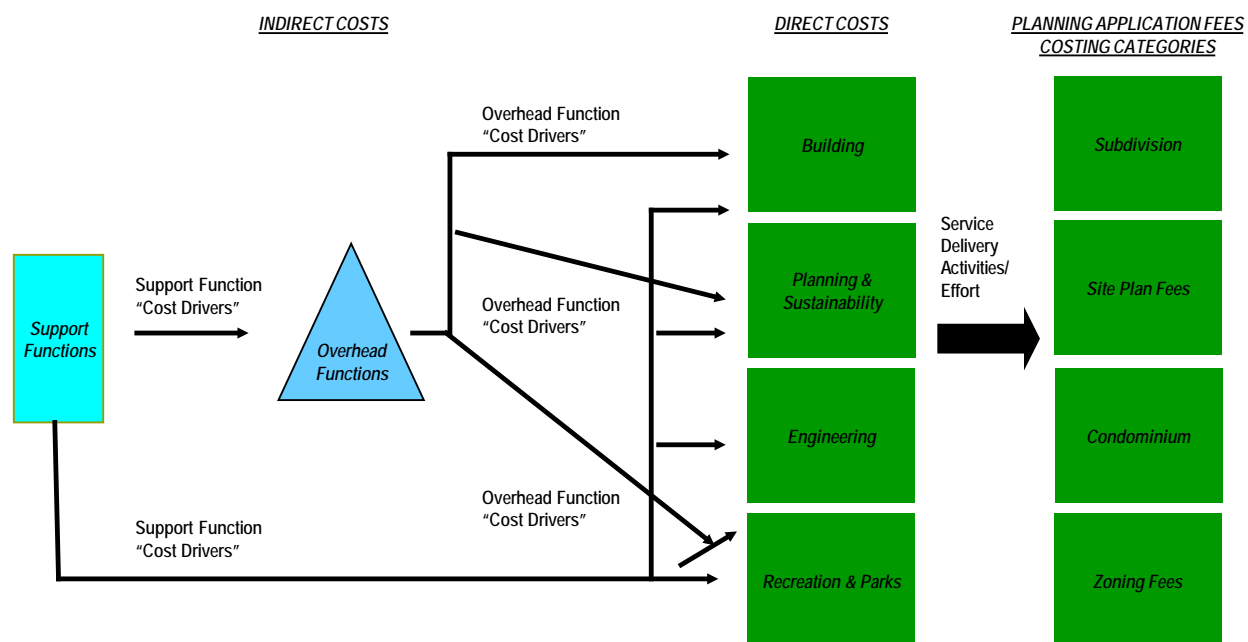
An Activity-Based Costing (A.B.C.) methodology, as it pertains to municipal governments, assigns an organization's resource costs through activities to the services provided to the public. Conventional municipal accounting structures are typically not well suited to the costing challenges associated with development or other service processing activities, as these accounting structures are department focussed and thereby inadequate for fully costing services with involvement from multiple Town departments. An A.B.C. approach better identifies the costs associated with the processing activities for specific user fee types and thus is an ideal method for determining full cost recovery planning application fees.

As illustrated in Figure 2-1, an A.B.C. methodology attributes processing effort and associated costs from all participating municipal departments to the appropriate planning application categories. The resource costs attributed to processing activities and application categories include direct operating costs, indirect support costs, and capital costs. Indirect support function and corporate overhead costs are allocated to direct departments according to operational cost drivers (e.g. information technology costs allocated based on the relative share of departmental personal computers supported). Once support costs have been allocated amongst direct departments, the accumulated costs (i.e. indirect, direct, and capital costs) are then distributed across the various fee categories, based on the department's direct involvement in the processing activities. The assessment of each department's direct involvement in the planning application review process is accomplished by tracking the relative shares of staff processing effort across each fee category's sequence of mapped process steps. The results of employing this costing methodology provides municipalities with a better recognition of the costs utilized in delivering fee review processes, as it acknowledges not only the direct costs of resources deployed but also the operating and capital support costs required by those resources to provide services.

The following sections of this chapter review each component of the A.B.C. methodology as it pertains to the Town's planning application fees review.



**Figure 2-1**  
**Activity Based Costing Conceptual Cost Flow Diagram**



## 2.2 Application Category Definition

A critical component of the full cost fees review is the selection of the planning application costing categories. This is an important first step as the process design, effort estimation and subsequent costing is based on these categorization decisions. It is also important from a compliance stand point where, as noted previously, the *Planning Act* requires application fees to be cost justified by application type consistent with the categorization contained within the Town's tariff of fees. Moreover, the cost categorization process will provide insight into any differences in processing costs for each costing category within an application type, which is informative to the fee structure design exercise.

Fee categorization decisions were made using the Town's existing fee structure to guide further disaggregation of application types into costing categories for fee review purposes. Each application type was disaggregated to understand the potential differences in processing effort based on application size, location (greenfield vs. infill), development type (residential vs. industrial vs. other non-residential), and application type (new vs. revision). The fee categorization process was developed during the initial working sessions with Town staff at the outset of this review.

Given the cost justification requirements of the *Planning Act* and comments of the O.M.B. with respect to marginal costing, this level of disaggregation within application types is in direct response to the comments of the OMB and reflects an evolution in the costing methodology to exceed the statutory requirements and to better understand the factors influencing processing effort.

Summarized in Table 2-1, are the planning application fee costing categories that have been included in the Town's model and used to rationalize changes to the Town's Planning and Sustainability fee schedules.

The following explains the rationale for the major planning application categorization decisions utilized in the fee review:

- Official Plan Amendments, Zoning By-Law Amendments, Site Plan Applications, and Subdivision applications were disaggregated to consider the impact of application location (infill vs. greenfield), development type (residential vs. industrial vs. other non-residential), and application size to reflect differences in processing effort typically experienced. The differences in effort for new applications compared to revision applications was also considered;
- For Condominium applications, the size of the application was considered as well as whether the application was for draft plan approval, conversion, or common elements;
- Cost of Legal staff related to by-law and agreement preparation was considered for Site Plan, Subdivision, Condominium, and Part-lot Control Applications, as well as Pre-Servicing Agreements;
- For Minor Variance applications, processing requirements for residential vs. non-residential development types was assessed; and
- For the majority of application types, the scope of the potential applications was also assessed by giving consideration to Minor vs. Major application types.

**Table 2-1**  
**Planning Application Fee Types and Costing Categories**

Application Type	Costing Category
Official Plan Amendment (OPA)	OPA Processing Fee - Greenfield Residential, ≤50 dwelling units
	OPA Processing Fee - Greenfield Residential, >50 dwelling units
	OPA Processing Fee - Greenfield Industrial/Commercial/Institutional, ≤9,290m <sup>2</sup> GFA / ≤2ha land area
	OPA Processing Fee - Greenfield Industrial/Commercial/Institutional, >9,290m <sup>2</sup> GFA / >2ha land area
	OPA Processing Fee - Infill Residential, ≤50 dwelling units
	OPA Processing Fee - Infill Residential, >50 dwelling units
	OPA Processing Fee - Infill Industrial/Commercial/Institutional, ≤9,290m <sup>2</sup> GFA / ≤2ha land area
	OPA Processing Fee - Infill Industrial/Commercial/Institutional, >9,290m <sup>2</sup> GFA / >2ha land area
	OPA Revision
	Halton Region OPA Review
Zoning By-law Amendment (ZBA)	ZBA Application Fee - Greenfield Residential, up to 50 dwelling units
	ZBA Application Fee - Greenfield Residential, greater than 50 dwelling units
	ZBA Application Fee - Greenfield Industrial/Commercial/Institutional, ≤9,290m <sup>2</sup> GFA / ≤2ha land area
	ZBA Application Fee - Greenfield Industrial/Commercial/Institutional, >9,290m <sup>2</sup> GFA / >2ha land area
	ZBA Application Fee - Infill Residential, up to 50 dwelling units
	ZBA Application Fee - Infill Residential, greater than 50 dwelling units
	ZBA Application Fee - Infill Industrial/Commercial/Institutional, ≤9,290m <sup>2</sup> GFA / ≤2ha land area
	ZBA Application Fee - Infill Industrial/Commercial/Institutional, >9,290m <sup>2</sup> GFA / >2ha land area
	ZBA Revision
	Holding Removal Fee
	Holding Removal Fee - Special
	Deeming By-law
	Temporary Use By-law
	Request for Council Extension of Temporary Use
Site Plans	SPA Agreement
	SPA Application Fee - Greenfield Residential, up to 50 dwelling units
	SPA Application Fee - Greenfield Residential, greater than 50 dwelling units
	SPA Application Fee - Greenfield Industrial, gross area up to 2 hectares
	SPA Application Fee - Greenfield Industrial, gross area greater than 2 hectares
	SPA Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.
	SPA Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.
	SPA Application Fee - Infill Residential, up to 50 dwelling units
	SPA Application Fee - Infill Residential, greater than 50 dwelling units
	SPA Application Fee - Infill Industrial, gross area up to 2 hectares
	SPA Application Fee - Infill Industrial, gross area greater than 2 hectares
	SPA Application Fee - Infill Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.
	SPA Application Fee - Infill Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.
	SPA Revision
	Extension Fee

**Table 2-1 (Cont'd)**  
**Planning Application Fee Types and Costing Categories**

Application Type	Costing Category
Subdivision (SUB) Fees	SUB Agreement
	SUB Application Fee - Greenfield Residential, up to 50 dwelling units
	SUB Application Fee - Greenfield Residential, greater than 50 dwelling units
	SUB Application Fee - Greenfield Industrial, gross area up to 10 hectares
	SUB Application Fee - Greenfield Industrial, gross area greater than 10 hectares
	SUB Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.
	SUB Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.
	SUB Application Fee - Infill Residential, up to 50 dwelling units
	SUB Application Fee - Infill Residential, greater than 50 dwelling units
	SUB Application Fee - Infill Industrial, gross area up to 5 hectares
	SUB Application Fee - Infill Industrial, gross area greater than 5 hectares
	SUB Application Fee - Infill Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.
	SUB Application Fee - Infill Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.
	SUB Revision
	SUB Ext. of Draft Approval
	SUB Administrative Final Approval
Condominium	Condo Agreement
	Condominium Minor, up to 50 buildable lots/blocks or units or applies to a gross area up to 2 hectares
	Condominium Major, greater than 50 buildable lots/blocks or units or applies to a gross area greater than 2 hectares
	Condominium Conversion or Exemption
	Condominium Common Element
	Condominium Revision
Part Lot Control By-law (PLCB) Fees	Condominium Ext. of Draft Approval
	PLC By-Law Preparation
	PLCB Application Fee, up to 50 buildable lots/block or units or applies to a gross area up to 5 hectares
	PLCB Major Application Fee, greater than 50 buildable lots/block or units or applies to a gross area greater than 5 hectares
Consent Fees	PLCB Extension
	Consent Application Fee (1 lot)
	Consent Application Fee (Multiple lots)
	Consent Application Fee (Lot Line Adjustment, Easement)
Minor Variance	Consent Revision
	Consent Post Approval (Certification)
	Minor Variance Application Fee
	Minor Variance - Minor Residential Application fee

## **2.3 Processing Effort Cost Allocation**

To capture each participating Town staff member's relative level of effort in processing planning applications, process templates were prepared for each of the above-referenced application costing categories. The process templates were generated using sample templates based on processes in neighboring municipalities and then refined and modified to reflect the planning application review process as it occurs in the Town.

The individual process maps were populated by Town staff in internal working sessions. The effort estimates used reflect the level of involvement by participating staff within each department on processing activities.

Annual processing effort per staff position was compared with available processing capacity to determine overall service levels. Subsequent to this initial capacity analysis, working sessions were held with the Town staff to further define the scope and nature of various departments' involvement in planning application fee review activities to reflect current staff utilization levels. These refinements provided for the recognition of efforts within the planning application fees review ancillary to direct processing tasks, i.e. departmental support activities and management and application oversight activities by departmental senior management. Effort related to planning policy and special projects related to planning applications were not included in the definition of planning application processing activities.

The capacity utilization results are critical to the full cost recovery fee review because the associated resourcing costs follow the activity generated effort of each participating staff member into the identified planning application fee categories. As such, considerable time and effort was spent ensuring the reasonableness of the capacity utilization results. The overall departmental fee recovery levels underlying the calculations are provided in Chapter 3 of this report.

## **2.4 Direct Costs**

Direct costs refer to the employee costs (salaries and wages, employer contributions), stationery and office supplies, and consulting and professional fees that are typically consumed by directly involved departments. Based on the results of the resource capacity analysis summarized above, the proportionate share of each individual's direct costs is allocated to the respective fee categories. The direct costs included in the Town's costing model are taken from the Town's 2017 budget (subsequently indexed to

2018\$ using the Town's 2018 cost of living increase of 3% and includes cost components such as:

- Labour Costs, e.g. salary, wages and benefits;
- Insurance Costs;
- Communication Costs;
- Hardware and Software Maintenance Costs;
- Utility Costs;
- Repairs and Maintenance Costs; and
- Materials, Supplies and Other Services.

It should be noted that transfers to reserves (reserve funds) and transfers to capital have been excluded from the direct service costs, as these reflect financing costs. Moreover, capital costs have been provided for separately within the analysis.

Based on the modelling results, the following departments have direct participation in the review and approval of planning applications.

- Planning and Sustainability
- Building;
- Engineering;
- Office of the CAO;
- Finance;
- Corporate Communications;
- Fire Services; and
- Recreation and Parks;

## **2.5 Indirect Cost Functions and Cost Drivers**

An A.B.C. review includes both the direct service cost of providing service activities as well as the indirect support costs that allow direct service departments to perform these functions. The method of allocation employed in this analysis is referred to as a step-down costing approach. Under this approach, support function and general corporate overhead functions are classified separate from direct service delivery departments. These indirect cost functions are then allocated to direct service delivery departments based on a set of cost drivers, which subsequently flow to planning application fee categories according to staff effort estimates. Cost drivers are a unit of service that best represent the consumption patterns of indirect support and corporate overhead services by direct service delivery departments. As such, the relative share of a cost driver (units

of service consumed) for a direct department determines the relative share of support/corporate overhead costs attributed to that direct service department. An example of a cost driver commonly used to allocate information technology support costs would be a department's share of supported personal computers. Cost drivers are used for allocation purposes acknowledging that these departments do not typically participate directly in the development review process, but that their efforts facilitate services being provided by the Town's direct departments.

The indirect support and corporate overhead cost drivers used in the fees model reflects accepted practices within the municipal sector by municipalities of similar characteristics.

## 2.6 Capital Costs

The inclusion of capital costs within the full cost planning application fees calculations follow a methodology similar to indirect costs. The annual replacement value of assets commonly utilized to provide direct department services has been included to reflect capital costs of service. The replacement value approach determines the annual asset replacement value over the expected useful life of the respective assets. This reflects the annual depreciation of the asset over its useful life based on current asset replacement values using a sinking fund approach. This annuity is then allocated across all fee categories based on the capacity utilization of direct departments.

The annual replacement contribution applied for facility space is \$4.84/square foot. This information derived from the Town's 2017 Development Charges Background Study. The capital replacement costs of staff work stations that would be in addition to facility replacement costs was also considered. The annual replacement contribution applied for work stations was \$406 per work station. These annual capital costs estimates were then allocated to the fee categories based on resource capacity utilization.



### 3. Planning Application Fees Review

#### 3.1 Staff Capacity Utilization Results

The planning application review process considered within this assessment involves to varying degrees, staff from multiple departments across the organization. The planning application processing effort estimates in this report reflect the Town's current business processes, 2011-2016 average application volumes, and staffing allocation patterns currently in place across Town departments. Moreover, the processing effort estimates were developed with regard to the typical application types within the 2011-2016 period.

Table 3-1 summarizes the staff capacity utilization and number of full time equivalent (F.T.E.) positions attributable to planning application processes. Currently, planning application processes consume approximately 13 F.T.E.s annually across the organization.

**Table 3-1**  
**Planning Application Resource Utilization by Department (in F.T.E.)**

Department	No. of Staff	Staff Utilization	
		%	FTE
Planning & Sustainability	19	47.9%	9.09
Building	17.25	0.7%	0.12
Engineering	21	11.7%	2.46
Office of the CAO	15	3.6%	0.54
Finance	21	0.3%	0.06
Corporate Communications	2	1.4%	0.03
Fire Services	22	0.2%	0.04
Recreation and Parks	7	6.3%	0.44
<b>Total</b>			<b>12.78</b>

The following observations are provided based on the results of the capacity analysis presented in Table 3-1:

- On average approximately 48% of all available staff resources within the Planning & Sustainability department are fully consumed processing planning applications. Staff from this department provide the largest amount of effort to planning applications within the Town at 71% of the overall involvement. This level of planning recovery is comparable with levels of participation in other

Greater Toronto Area (G.T.A.) municipalities, reflecting a significant amount of non-planning application processing effort provided by planning departments for corporate management, policy initiatives, O.M.B. appeals, and public information tasks.

- Engineering Services provides the second largest allocation of staff resources (2.5 F.T.E.s) to planning application review, accounting for 12% of their available staff resources. Staff from the Engineering department provide 19% of the overall planning application review process.
- There are a number of other Town departments such as Recreation and Parks and the Building department that individually provide relatively small allotments of effort to planning application review. In aggregate, these other departments contribute 1.2 F.T.E.s or 10% of the overall effort.

### **3.2 Planning Application Type Impacts**

As presented in the introduction, the *Planning Act* requires fees to be cost justified at the application type level. Moreover, recent O.M.B. decisions require that there is consideration given to the marginal costs of processing applications of varying size and complexity. In this regard, planning application review processes have been costed at the application type and sub-type level. This level of analysis goes beyond the statutory requirements of cost justification by application type to better understand costing distinctions at the application sub-type level to provide the basis for more a more defensible fee structure and fee design decisions. Application costs reflect the organizational direct, indirect and capital costs based on 2017 budget estimates, indexed to 2018\$ values. Table 3-2, summarizes the per application processing costs compared with per application fees currently charged by the Town in 2018.

**Table 3-2**  
**Planning Fees Modelling Impacts by Application Sub-Type (2018\$)**

Application Type and Costing Category	Cost per Application	2018 Application Fees	Cost Recovery %
<b><u>Official Plan Amendment (OPA)</u></b>			
OPA Processing Fee - Greenfield Residential, ≤50 dwelling units	69,054	22,846	33%
OPA Processing Fee - Greenfield Residential, >50 dwelling units	69,054	22,846	33%
OPA Processing Fee - Greenfield Industrial/Commercial/Institutional, ≤9,290m2 GFA / ≤2ha land area	69,054	22,846	33%
OPA Processing Fee - Greenfield Industrial/Commercial/Institutional, >9,290m2 GFA / >2ha land area	69,054	22,846	33%
OPA Processing Fee - Infill Residential, ≤50 dwelling units	83,600	22,846	27%
OPA Processing Fee - Infill Residential, >50 dwelling units	83,600	22,846	27%
OPA Processing Fee - Infill Industrial/Commercial/Institutional, ≤9,290m2 GFA / ≤2ha land area	69,348	22,846	33%
OPA Processing Fee - Infill Industrial/Commercial/Institutional, >9,290m2 GFA / >2ha land area	69,356	22,846	33%
OPA Revision	26,748	19,057	71%
Halton Region OPA Review	3,365	9,070	270%
<b><u>Zoning By-Law Amendment (ZPA)</u></b>		-	0%
ZBA Application Fee - Greenfield Residential, up to 50 dwelling units	45,030	19,746	44%
ZBA Application Fee - Greenfield Residential, greater than 50 dwelling units	45,166	19,746	44%
ZBA Application Fee - Greenfield Industrial/Commercial/Institutional, ≤9,290m2 GFA / ≤2ha land area	44,894	19,746	44%
ZBA Application Fee - Greenfield Industrial/Commercial/Institutional, >9,290m2 GFA / >2ha land area	45,030	19,746	44%
ZBA Application Fee - Infill Residential, up to 50 dwelling units	67,935	19,746	29%
ZBA Application Fee - Infill Residential, greater than 50 dwelling units	68,074	19,746	29%
ZBA Application Fee - Infill Industrial/Commercial/Institutional, ≤9,290m2 GFA / ≤2ha land area	67,935	19,746	29%
ZBA Application Fee - Infill Industrial/Commercial/Institutional, >9,290m2 GFA / >2ha land area	68,074	19,746	29%
ZBA Revision	21,470	16,187	75%
Holding Removal Fee	14,516	5,166	36%
Holding Removal Fee - Special	18,732	574	3%
Deeming By-law	4,012	2,296	57%
Temporary Use By-law	43,775	12,284	28%
Request for Council Extension of Temporary Use	29,637	5,396	18%

**Table 3-2 (Cont'd)**  
**Planning Fees Modelling Impacts by Application Sub-Type (2018\$)**

Application Type and Costing Category	Cost per Application	2018 Application Fees	Cost Recovery %
<b>Site Plan Application (SPA)</b>			
SPA Agreement	5,114	4,707	92%
SPA Application Fee - Greenfield Residential, up to 50 dwelling units	49,035	12,284	25%
SPA Application Fee - Greenfield Residential, greater than 50 dwelling units	61,316	43,625	71%
hectares	47,422	12,284	26%
SPA Application Fee - Greenfield Industrial, gross area greater than 2 hectares	60,384	43,625	72%
SPA Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.	47,422	12,284	26%
SPA Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.	60,384	43,625	72%
SPA Application Fee - Infill Residential, up to 50 dwelling units	54,574	12,284	23%
SPA Application Fee - Infill Residential, greater than 50 dwelling units	67,520	43,625	65%
SPA Application Fee - Infill Industrial, gross area up to 2 hectares	51,267	12,284	24%
hectares	61,169	43,625	71%
SPA Application Fee - Infill Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.	51,267	12,284	24%
SPA Application Fee - Infill Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.	61,169	43,625	71%
SPA Revision	10,381	9,644	93%
Extension Fee	1,121	1,033	92%
<b>Subdivision (SUB)</b>			
SUB Agreement	29,818	6,314	21%
SUB Application Fee - Greenfield Residential, up to 50 dwelling units	171,998	43,739	25%
SUB Application Fee - Greenfield Residential, greater than 50 dwelling units	198,935	62,107	31%
SUB Application Fee - Greenfield Industrial, gross area up to 10 hectares	109,057	43,739	40%
SUB Application Fee - Greenfield Industrial, gross area greater than 10 hectares	109,057	62,107	57%
SUB Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.	109,057	43,739	40%
SUB Application Fee - Greenfield Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.	109,057	62,107	57%
SUB Application Fee - Infill Residential, up to 50 dwelling units	181,112	43,739	24%
SUB Application Fee - Infill Residential, greater than 50 dwelling units	209,702	62,107	30%
SUB Application Fee - Infill Industrial, gross area up to 5 hectares	119,426	43,739	37%
hectares	119,426	62,107	52%
SUB Application Fee - Infill Non-Residential, Non-Industrial, gross floor area up to 100,000 sq.ft.	119,426	43,739	37%
SUB Application Fee - Infill Non-Residential, Non-Industrial, gross floor area greater than 100,000 sq.ft.	119,609	62,107	52%
SUB Revision	32,081	28,586	89%
SUB Ext. of Draft Approval	3,671	1,033	28%
SUB Administrative Final Approval	1,335	2,870	215%

**Table 3-2 (Cont'd)**  
**Planning Fees Modelling Impacts by Application Sub-Type (2018\$)**

Application Type and Costing Category	Cost per Application	2018 Application Fees	Cost Recovery %
<b><u>Condominium (CDM)</u></b>			
Condo Agreement	26,394	6,314	24%
Condominium Minor, up to 50 buildable lots/blocks or units or applies to a gross area up to 2 hectares	45,947	24,452	53%
Condominium Major, greater than 50 buildable lots/blocks or units or applies to a gross area greater than 2 hectares	46,621	43,510	93%
Condominium Conversion or Exemption	31,025	20,779	67%
Condominium Common Element	26,589	24,452	92%
Condominium Revision	13,521	22,386	166%
Condominium Ext. of Draft Approval	3,344	4,133	124%
<b><u>Part Lot Control By-Law (PLCB)</u></b>			
PLC By-Law Preparation	1,800	1,837	102%
PLCB Application Fee, up to 50 buildable lots/block or units or applies to a gross area up to 5 hectares	6,630	5,970	90%
PLCB Major Application Fee, greater than 50 buildable lots/block or units or applies to a gross area greater than 5 hectares	6,763	6,774	100%
PLCB Extension	3,140	689	22%
<b><u>Consent</u></b>			
Consent Application Fee (1 lot)	14,022	9,758	70%
Consent Application Fee (Multiple lots)	14,539	9,758	67%
Consent Application Fee (Lot Line Adjustment, Easement)	16,134	4,707	29%
Consent Revision	2,729	1,891	69%
Consent Post Approval (Certification)	368	2,755	749%
<b><u>Minor Variance</u></b>			
Minor Variance Application Fee	8,218	4,936	60%
Minor Variance - Minor Residential Application fee	7,973	2,870	36%

As presented in Table 3-2, almost all planning application fees are recovering less than the average costs of processing. Table 3-3 summarizes the direct, indirect, and capital costs by application type and the cost recovery percentage after netting out the cost related to development agreements (costs recovered through separate fees). The overall recovery levels are based on the weighted average annual historical application volumes over the 2011-2016 period. Current application fees are on average recovering 40% of the annual costs of service

**Table 3-3**  
**Planning Fees Modelling Impacts by Application Type**

Application Type	Annual Costs			Less:	Net Annual Costs	Net Modelled Revenue (Current 2018 Fees)	% Cost Recovery
	Direct	Indirect & Capital	Total	Annual Costs (Development Agreements)			
Condominium	33,256	17,791	51,047	18,124	32,924	18,178	55%
Consent	96,780	24,667	121,447		121,447	76,188	63%
H Removal	70,476	14,593	85,069		85,069	23,534	28%
Minor Variance	144,969	35,057	180,026		180,026	80,625	45%
Official Plan Amendment	80,891	16,431	97,322		97,322	30,692	32%
Part Lot Control By-Law	8,128	3,186	11,315	2,399	8,915	8,285	93%
Site Plan	653,051	157,568	810,619	65,629	744,989	285,554	38%
Subdivision	484,941	127,469	612,410	101,878	510,531	205,651	40%
Zoning By-Law Amendment	157,863	32,985	190,848		190,848	67,046	35%
Total	1,730,354	429,748	2,160,102	188,031	1,972,071	795,753	40%

### 3.3 Rate Structure Analysis

Fee structure recommendations were developed in regard to the cost and revenue impacts presented in Tables 3-2 and 3-3. The recommended fee structure seeks to align the recovery of processing costs to application characteristics to balance *Planning Act* compliance, applicant benefits and municipal revenue certainty. The recommended fee structure, which is presented in 2018\$ values has been developed to increase cost recovery levels while being consistent with industry best practices and comparable to those of Halton Region area municipalities. The Town currently imposes a flat per application fee for all planning application fees. Although the costing categories examined the difference in costs between applications occurring in greenfield vs. infill areas, it was determined that the average cost by area would be assessed in the design of fees to reflect affordability concerns and to consider the administrative process of imposition. For most application types, the recommended fee structure includes a base fee and variable fee in recognition of the decreasing marginal costs of processing.

Table 3-4 displays the cost recovery levels by major application type based on the recommended fee structure. The fee structure recommendations are anticipated to increase overall planning application cost recovery performance from 40% currently to 71% (based on average historical application volumes and typical size characteristics) or an increase in revenue of 75%. Within the overall cost recovery levels, the performance by application types varies between 33% for H Removal and full cost recovery for Condominium and Part Lot Control By-law applications. This variation is related to the average application processing costs and considerations for affordability and competitiveness.

**Table 3-4**  
**Recommended Fee Structure Impacts by Application Type**

Application Type	% Cost Recovery
Condominium	100%
Consent	80%
H Removal	33%
Minor Variance	48%
Official Plan Amendment	62%
Part Lot Control By-Law	100%
Site Plan	81%
Subdivision	61%
Zoning By-Law Amendment	83%
Total	71%

A summary of the recommended changes to fee structure is provided in section 3.3.1, while the complete fee schedule is provided in Appendix A.

### **3.3.1 Fee Structure Recommendations**

#### **Official Plan Amendment**

For Official Plan Amendments (O.P.A.), currently the Town typically imposes a base fee of \$22,846 depending on the scope of the application. Based on the results of the A.B.C. model, this application would cost on average \$73,000 to process.

#### **Fee Recommendations**

- Impose base fee of \$22,846 plus:
  - Implement a declining block rate structure for the variable portion of both residential and non-residential application fees to reflect the decreasing marginal cost of processing applications;
- Revision fee to be calculated as 37% of the full application fee (\$8,959 minimum); and
- Decrease the Halton Region O.P.A. – Town Review fee to \$3,366

### **Zoning By-law Amendment**

Zoning By-law Amendment (Z.B.A.) applications are generally under recovering costs of processing. Smaller applications that would be charged the Minor and/or Technical fee have a lower level of cost recovery (17-25%) when compared to larger applications which would be imposed the full application fee (29-44%). Holding Removal applications are recovering 29% of costs, while Holding Removal applications charged the “special” fee are recovering only 3% of costs. Temporary Use fees are recovering between 18-28% of total costs.

As a result, the proposed fee structure proposed to maintain a similar entry point for smaller applications by maintaining the Minor and/or Technical fee and setting the base fee for full Z.B.A. applications at the same level as the current fee (\$19,746). Consistent with fee structures in Halton Region and throughout the G.T.A., the recommended fee structure includes declining block variable fees for residential and non-residential development.

#### **Fee Recommendations**

- Maintain fee for Minor and/or Technical application fee of \$11,365;
- Impose base fee of \$19,746 for full applications and introduce declining block rate structure for residential and non-residential applications;
- Change Z.B.A. Revision fees to 40% of full application fees (\$7,807 minimum);
- Maintain Holding Removal fees at current levels; and
- Increase the fee for Temporary Use or Deeming By-law to the same level as the Z.B.A. base fee (\$19,746)

### **Site Plan Applications**

The Town currently charges three Site Plan Application (S.P.A.) fees: \$8,945 for minor applications, \$12,284 for applications less than 50 units or 100,000 sq.ft. or gross floor area G.F.A.), and \$43,625 for applications greater than 50 units or 100,000 sq.ft of G.F.A.). Consistent with industry best practices, the proposed fee structure includes base and declining block variable fees to provide the Town with a greater level of cost recovery while providing consideration for affordability and the decreasing marginal costs of processing.

#### **Fee Recommendations**

- Maintain fee for Minor applications fee of \$8,954;



- Impose a base fee for all other S.P.A.s at the level of the current fee for applications of less than 50 units or 100,000 sq.ft of G.F.A. of \$12,284;
- For applications not defined as Minor, introduce declining block rate structure for residential and non-residential applications; and
- Change S.P.A. Revision fees to 20% of full application fees (\$5,127 minimum)

### **Plan of Subdivision**

The current fees for Plan of Subdivision applications is \$24,224 for minor applications, \$43,739 for applications less than 50 buildable lots/block or units or 5 hectares of gross area, and \$62,107 for applications proposing to develop more than 50 buildable lots/block or units or 5 hectares of gross area. Consistent with the recommendations for other application types, the fee structure revisions for Subdivision applications have been designed to have consideration for affordability and the fee structures imposed in other Halton Region municipalities.

#### **Fee Recommendations**

- Impose base for all minor and non-minor applications of \$24,224;
- For non-minor applications, impose a declining per residential unit and per non-residential hectare fee; and
- Charge one Subdivision revision fee of 23% of full application fees (\$2,526 minimum)

### **Plan of Condominium**

The Town currently charges flat application fees for Draft Plan of Condominium, Condominium Conversion, and Condominium Common Element of between \$20,779 and \$43,510. Based on the A.B.C. results shown in Table 3-2, which indicate that the costs to process these different types of applications are similar, regardless of size, the recommended fee structure seeks to align the application fees among the different types of condominium applications for greater cost recover and administrative ease.

#### **Fee Recommendations**

- Impose fee of \$28,051 for Draft Plan of Condominium applications, Condominium Conversion applications, and Condominium Common Element Condominium applications; and
- Revise Condominium Revisions application fee to be 35% of full application fees (\$7,003 minimum)

### **Part Lot Control By-law**

Part Lot Control By-law applications are recovering close to the full costs of processing (93%), and as such, only minor changes to the fee structure are proposed to improve cost recovery by sub-type. The fee structure recommendations include imposing one application fee in place of the disaggregated application fee for applications greater or less than 50 units and increasing the Extension fee from \$689 to \$1,340.

### **Consent**

The Town currently charges Consent application fees for standard applications, Minor applications, Lot Line Adjustments and Easements, Revisions to Consent applications, and Post Approval Certification. With the exception of the fee for Post Approval Certification and Minor applications for which there is no increase recommended, Consent application fees are proposed to increase moderately.

#### **Fee Recommendations**

- Increase Consent application fee to \$10,000;
- Increased the Consent Revision fee to \$2,729; and
- Maintain minor application and Post Approval Certification fees at current rates

### **Minor Variance**

The Minor Variance fees imposed by the Town currently are \$2,870 for minor residential applications and \$4,936 for all other Minor Variance applications. Minor Variance applications within the Town are recovering between 36-6% of the full costs of processing. Having regard for affordability and competitiveness, no changes have been recommended to the fee Minor Residential applications. The fee for other Minor Variance applications is recommended to increase from \$4,936 to \$5,750.

### **Combined Applications**

In developing the recommended fee structure, the Town has also given consideration to total processing effort related reviewing Official Plan Amendment, Zoning By-law Amendment and Subdivision applications received concurrently. Compared to when these types of applications are received in separately, there are certain activities that only need to be undertaken once when received in combination (e.g. application intake and circulation). To recognize these processing efficiencies and the types of fee structures imposed in Halton Region area municipalities, the recommended fee structure includes reductions to the base application fees that would be imposed on these applications if received separately.

Fee Recommendations

- Official Plan Amendment and Zoning By-law Amendment applications received concurrently – Full Official Plan Amendment application fee plus Zoning By-law Amendment application base fee;
- Zoning By-law Amendment and Plan of Subdivision applications received concurrently – Full Subdivision application fee plus 75% of Zoning By-law application base fee; and
- Official Plan Amendment, Zoning By-law Amendment, and Subdivision applications received concurrently – Full Subdivision application fee plus Official Plan Amendment application base fee and 75% of Zoning By-law application base fee

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## 4. Impact Analysis of Recommended Fee Structure

In order to understand the impacts of the recommended planning application fee structure recommendations, an impact analysis for sample developments has been prepared. Comparison graphs for planning application only, are provided in Appendix B.

### 4.1 Impact Analysis

Three development types have been considered, including:

- Official Plan Amendment, Plan of Subdivision and Zoning By-law Amendment applications for a residential subdivision of 100 single detached units;
- Site Plan and Zoning By-law Amendment applications for a retail building of 1,000 sq.mt.; and
- Site Plan application for an industrial building of 30,000 sq.mt.

In addition to providing the fee impacts for the Town of Halton Hills, Tables 4-1 through 4-3 provide development fee comparisons for selected municipalities, highlighting the positions of the Halton Region area municipalities. The development fee comparison includes planning application fees, building permit fees and development charges for each of the three development types. The comparison illustrates the impacts of the planning application fee structure recommendations in the context of the total development fees payable to provide a broader context for the fee considerations.

#### ***4.1.1 Residential Single Detached (100 units) – Official Plan Amendment, Plan of Subdivision, and Zoning By-law Amendment Applications (Table 4-1)***

A 100-unit single detached residential subdivision in the Town of Halton Hills would pay \$360 per unit in Official Plan Amendment fees, \$975 per unit in Subdivision fees, and \$159 per unit in Zoning By-law Amendment fees under the Town's current fee structure.

Under the recommended fee structure, Official Plan Amendment fees would increase to \$440 per unit (+22%) Subdivision fees would increase to \$1,021 per unit (+5%). Zoning By-law Amendment fees would increase by 0.6% or \$1/unit because of the application of the Town's proposed fee policy for combined applications. Including building permit fees and development charges, total development fees for this type of applicant would increase by 0.2% from \$53,577/unit to \$53,702/unit. The Town of would maintain their

position at 7<sup>th</sup> out of the 16 municipalities surveyed, lower than the Town of Oakville and Town of Milton, yet higher than the City of Burlington.

**Table 4-1**  
**Development Fee Impacts Survey for a Residential Subdivision (100 Single Detached Units)**

Rank	Municipality	Official Plan Amendment	Plan of Subdivision	Zoning By-Law Amendment	Building Permit Fees	Development Charges	Total	Planning Fees - % of Total
1	Toronto, City of	\$ 55,707	\$ 245,510	\$ 124,542	\$ 324,052	\$ 8,970,000	\$ 9,719,810	4.4%
2	Mississauga, City of	\$ 48,986	\$ 65,561	\$ 121,750	\$ 305,651	\$ 8,526,608	\$ 9,068,557	2.6%
3	Brampton, City of	\$ 30,888	\$ 93,510	\$ 9,571	\$ 219,809	\$ 8,536,465	\$ 8,890,242	1.5%
4	Oakville, Town of	\$ 45,694	\$ 72,262	\$ 19,400	\$ 307,509	\$ 5,866,630	\$ 6,311,495	2.2%
5	Whitby, Town of	\$ 53,711	\$ 77,036	\$ 10,869	\$ 223,897	\$ 5,305,700	\$ 5,671,212	2.5%
6	Milton, Town of	\$ 39,754	\$ 83,003	\$ 14,310	\$ 215,535	\$ 5,243,430	\$ 5,596,032	2.4%
7	Halton Hills, Town of - Proposed	\$ 43,965	\$ 102,080	\$ 15,779	\$ 315,871	\$ 4,892,530	\$ 5,370,224	3.0%
8	Halton Hills, Town of - Current	\$ 36,026	\$ 97,463	\$ 15,876	\$ 315,871	\$ 4,892,530	\$ 5,357,766	2.8%
9	Oshawa, City of	\$ 40,883	\$ 25,911	\$ 5,068	\$ 242,291	\$ 4,785,200	\$ 5,099,354	1.4%
10	Ajax, Town of	\$ 68,447	\$ 61,017	\$ 24,947	\$ 204,387	\$ 4,718,200	\$ 5,076,997	3.0%
11	Pickering, City of	\$ 52,333	\$ 50,183	\$ 16,583	\$ 232,258	\$ 4,544,400	\$ 4,895,758	2.4%
12	Burlington, City of	\$ 35,902	\$ 116,358	\$ 14,903	\$ 301,583	\$ 4,219,930	\$ 4,688,676	3.6%
13	Hamilton, City of	\$ 19,040	\$ 44,183	\$ 17,509	\$ 279,267	\$ 3,933,700	\$ 4,293,698	1.9%
14	Vaughan, City of	\$ 95,061	\$ 108,194	\$ 39,931	\$ 211,819	\$ 3,750,600	\$ 4,205,605	5.8%
15	Markham, City of	\$ 103,980	\$ 303,470	\$ 37,510	\$ 294,317	\$ 3,242,599	\$ 3,981,876	11.2%
16	Ottawa, City of	\$ 18,227	\$ 71,828	\$ 15,215	\$ 14,493	\$ 3,536,400	\$ 3,656,163	2.9%
17	Richmond Hill, Town of	\$ 103,257	\$ 66,189	\$ 14,182	\$ 261,987	\$ 3,034,900	\$ 3,480,515	5.3%

#### **4.1.2 Retail Building (1,000 sq.mt.) - Site Plan and Zoning By-law Amendment Applications (Table 4-2)**

The current planning fees for this retail development would be \$38,801 (\$18,086 Site Plan and \$20,715 Zoning By-law Amendment). Imposing the recommended fee structure would increase the charge by 12% (\$4,347) to \$43,148 (\$21,183 Site Plan and \$21,965 Zoning By-law Amendment).

The impact of the recommended fee structure option on total development fees payable, including development charges and building permit fees, would result in a 1% increase. Planning fees currently comprise 8.6% of total development fees and would increase to 9.5% based on the recommended fee structure. The Town would maintain its competitive position in the mid range of the Halton Region area municipalities as well as the broader sample of municipalities.

**Table 4-2**  
**Development Fee Impacts Survey of 1,000 sq.mt Retail Development**

Rank	Municipality	Site Plan	Zoning By-Law Amendment	Building Permit Fees	Development Charges	Total	Planning Fees - % of Total
1	Markham, City of	\$ 24,880	\$ 37,510	\$ 14,880	\$ 572,150	\$ 649,420	9.6%
2	Richmond Hill, Town of	\$ 18,849	\$ 14,182	\$ 15,100	\$ 523,650	\$ 571,781	5.8%
3	Toronto, City of	\$ 24,782	\$ 45,250	\$ 19,200	\$ 459,158	\$ 548,390	12.8%
4	Vaughan, City of	\$ 20,006	\$ 10,492	\$ 14,000	\$ 498,300	\$ 542,798	5.6%
5	Oakville, Town of	\$ 18,766	\$ 26,134	\$ 23,060	\$ 450,859	\$ 518,819	8.7%
6	Burlington, City of	\$ 8,698	\$ 21,894	\$ 22,650	\$ 460,729	\$ 513,971	6.0%
7	Halton Hills, Town of - Proposed	\$ 21,183	\$ 21,965	\$ 16,100	\$ 396,139	\$ 455,387	9.5%
8	Halton Hills, Town of - Current	\$ 18,086	\$ 20,715	\$ 16,100	\$ 396,139	\$ 451,040	8.6%
9	Milton, Town of	\$ 9,567	\$ 15,600	\$ 10,620	\$ 412,759	\$ 448,546	5.6%
10	Mississauga, City of	\$ 25,801	\$ 54,350	\$ 17,240	\$ 328,626	\$ 426,017	18.8%
11	Brampton, City of	\$ 6,080	\$ 10,297	\$ 16,320	\$ 325,460	\$ 358,157	4.6%
12	Whitby, Town of	\$ 16,747	\$ 15,661	\$ 13,920	\$ 252,689	\$ 299,017	10.8%
13	Oshawa, City of	\$ 5,854	\$ 10,506	\$ 15,070	\$ 244,709	\$ 276,139	5.9%
14	Hamilton, City of	\$ 11,515	\$ 23,345	\$ 16,470	\$ 222,488	\$ 273,818	12.7%
15	Ottawa, City of	\$ 19,358	\$ 15,215	\$ 830	\$ 236,160	\$ 271,563	12.7%
16	Ajax, Town of	\$ 9,108	\$ 24,980	\$ 13,000	\$ 207,419	\$ 254,507	13.4%
17	Pickering, City of	\$ 7,650	\$ 16,625	\$ 10,000	\$ 185,785	\$ 220,060	11.0%

#### **4.1.3 Industrial Building (30,000 sq.mt.) - Site Plan Application (Table 4-3)**

The current planning fees for an industrial site plan of 30,000 sq.mt. would be \$49,427. Imposing the recommended fee structure would result in a fee of \$77,593 or an increase of \$28,166 (+58%). Measuring the impact including building permit fees and development charges, the total input development application costs would increase by 0.7%. Moreover, planning application fees as percentage of total development fees payable would increase from 1.2% to 1.8%. Under this recommendation the Town's position relative to the comparator municipalities would remain unchanged at 13<sup>th</sup> out of 16 municipalities. For this development type, the Town's total development fees would be less than that in all Halton Region area municipalities.

**Table 4-3**  
**Development Fee Impacts for an Industrial Building (30,000 sq.mt.)**

Rank	Municipality	Site Plan	Building Permit Fees	Development Charges	Total	Planning Fees - % of Total
1	Markham, City of	\$ 131,310	\$ 364,800	\$ 10,201,976	\$ 10,698,086	1.2%
2	Richmond Hill, Town of	\$ 18,849	\$ 414,000	\$ 8,056,496	\$ 8,489,345	0.2%
3	Mississauga, City of	\$ 69,990	\$ 376,000	\$ 7,825,278	\$ 8,271,268	0.8%
4	Vaughan, City of	\$ 21,029	\$ 285,000	\$ 7,847,996	\$ 8,154,025	0.3%
5	Oakville, Town of	\$ 197,696	\$ 432,850	\$ 6,678,630	\$ 7,309,176	2.7%
6	Brampton, City of	\$ 6,258	\$ 337,800	\$ 6,039,300	\$ 6,383,358	0.1%
7	Burlington, City of	\$ 47,268	\$ 206,157	\$ 5,634,330	\$ 5,887,755	0.8%
8	Whitby, Town of	\$ 64,613	\$ 299,700	\$ 5,308,170	\$ 5,672,483	1.1%
9	Ajax, Town of	\$ 32,988	\$ 270,000	\$ 5,360,370	\$ 5,663,358	0.6%
10	Pickering, City of	\$ 15,550	\$ 255,000	\$ 4,711,364	\$ 4,981,914	0.3%
11	Milton, Town of	\$ 38,067	\$ 212,400	\$ 4,295,730	\$ 4,546,197	0.8%
12	Hamilton, City of	\$ 11,515	\$ 346,800	\$ 4,162,404	\$ 4,520,719	0.3%
13	Halton Hills, Town of - Proposed	\$ 77,593	\$ 294,090	\$ 3,830,430	\$ 4,202,113	1.8%
14	Halton Hills, Town of - Current	\$ 49,427	\$ 294,090	\$ 3,830,430	\$ 4,173,947	1.2%
15	Oshawa, City of	\$ 5,854	\$ 262,796	\$ 3,749,070	\$ 4,017,720	0.1%
16	Ottawa, City of	\$ 21,509	\$ 19,500	\$ 3,374,486	\$ 3,415,495	0.6%
17	Toronto, City of	\$ 229,232	\$ 430,500	\$ 303,542	\$ 963,275	23.8%

## 4.2 Impact Analysis Summary

Based on the survey results, the recommended fees produce development fees greater than those provided under the current fee structure. However, the Town's ranking amongst the municipal comparators remains unchanged, and for the most part below that of the other Halton Region area municipalities. Finally, while the total planning impacts are significant in the case of the industrial development type surveyed, for each development type when measured on a total development cost basis, including building permits and development charges, the overall cost impacts are nominal (0.2% to 1% crease).

## 5. Conclusions

### 5.1 Conclusions

Summarized in this technical report is the legislative context for the planning application fees review, the methodology undertaken, A.B.C. results and full cost of service, and fee structure recommendations. In developing the recommended fee structure, careful consideration was given affordability, market competitiveness, and to the recent trends pertaining to planning fees, including recent comments of the O.M.B. concerning planning application fees.

The recommendations of the planning application fees review have been designed to provide the Town with a recommended fee structure for Council's consideration to increase the planning application cost recovery levels by recovering the service costs from benefiting parties. The municipality will ultimately determine the level of cost recovery and phasing strategy that is suitable for their objectives.



## **Appendix A – Recommended Fee Structure**

	Current									
Combined Application Fees		Recommended Fees								
Official Plan Amendment and Zoning By-law Amendment Applications received concurrently		Full OPA application fee plus ZBA application base fee								
Zoning By-law Amendment and Plan of Subdivision Applications received concurrently		Full SUB application fee plus 75% of ZBA application base fee								
Official Plan Amendment, Zoning By-law Amendment and Plan of Subdivision Applications received concurrently		Full SUB application fee plus OPA application base fee and 75% of ZBA application base fee								
		Recommended Fees								
Official Plan Amendment (OPA)	Current 2018 Fee	Base Fee	Variable Fee							
			Per Residential Unit				Per Non-Residential Hectare			
			0-25	26-100	101-200	201-1,000	0-1	1-10	10-20	20-40
OPA - Processing Fee										
Average Cost Fee	22,846	22,846	120	100	80	70	6,000	3,000	1,500	750
Minor and/or Technical	12,858	12,858								
OPA Deferral Removal Fee - Town	4,707	4,707								
OPA Revision Fee	19,057 / 8,959	37% of full application fees (\$8,959 minimum)								
Halton Region OPA - Town Review Fee	9,070	3,365								
Halton Region OPA when filed with consolidated Town OPA/ZBA	6,349	2,356								
		Recommended Fees								
Zoning By-Law Amendment (ZBA)	2018 Fee	Base Fee	Variable Fee							
			Per Residential Unit				Per Non-Residential Hectare			
			0-25	26-100	101-200	201-1,000	0-1	1-10	10-20	20-40
ZBA Fee										
Average Cost Fee	19,746	19,746	500	300	200	100	5,000	3,000	2,000	500
Minor and/or Technical	11,365	11,365								
ZBA Revision	16,187 / 7,807	40% of full application fees (\$7,807 minimum)								
Holding By-Law Amendment Removal - Major	5,166	5,500								
Holding By-Law Amendment Removal - Minor	2,870	2,870								
Holding By-Law Amendment Removal - Special	574	574								
Temporary Use	12,284	19,746								
Council Extension of a Temporary Use By-law	5,396	5,396								
		Recommended Fees								
Site Plan Application (SPA)	2018 Fee	Base Fee	Variable Fee							
			Per Residential Unit				Per Non-Residential Sq.M. GFA			
			0-25	26-100	101-200	201-1,000	0-5,000	5,001-20,000	20,001-45,000	45,001-100,000
Site Plan Agreement	4,707	5,114								
Site Plan Application Fee										
Average Cost Fee	12,284 / 43,625	12,284	400	200	125	90	2.69	2.15	1.34	0.67
Minor Application Fee	8,954	8,954								
Site Plan Revision	9,644 / 5,281	20% of full application fees (\$5,127 minimum)								
Site Plan Extension Fee	1,033	1,121								

Subdivision (SUB)		Recommended Fees								
	2018 Fee	Base Fee	Variable Fee							
			Per Residential Unit				Per Non-Residential Hectare			
			0-25	26-100	101-200	201-1,000	0-1	1-10	10-20	20-40
SUB Agreement	6,314	6,314								
SUB Application Fee										
Average Cost Fee	62,107 / 43,739	24,224	500	400	350	300	5,000	4,500	3,500	3,000
Minor fee	24,224	24,224								
SUB Final Approval Fee	16,991	16,991								
SUB Final Approval Fee - Administrative	2,870	2,870								
SUB Revision	2,526 / 12,169 / 28,856	23% of full application fees (\$2,526 Minimum								
SUB Ext. of Draft Approval (Council)	4,133	3,671								
SUB Ext. of Draft Approval (Staff)	1,033	917								

		Recommended Fees
	2018 Fee	Base Fee
Condominium (CDM)		
CDM Agreement	6,314	6,314
CDM Application Fee	24,452 / 43,510	28,051
CDM Final Approval Fee - Primary	17,909	17,909
CDM Final Approval Fee - Secondary	5,740	5,740
CDM Revision	22,386 / 7,003	35% of full application fees (\$7,003 minimum)
CDM Ext. of Draft Approval (Council)	4,133	3,344
CDM Ext. of Draft Approval (Staff)	919	744
CDM Conversion or Exemption Fee	20,779	28,051
		Recommended Fees
	2018 Fee	Base Fee
Part Lot Control By-Law (PLCB)		
Part Lot Control Exemption By-Law Preparation and Registration	1,837	1,800
Part Lot Control Exemption By-Law Preparation and Registration - Extension Request	1,837	1,800
PLCB Application Fee	5,970 / 6,774	6,663
PLCB Application Fee - Extension	689	1,340
Deeming By-law	2,296	4,012
	2018 Fee	Recommended Fees
		Base Fee
Consent		
Consent Application	9,758	10,000
Consent Minor Application Fee (Lot Line Adjustment, Easement)	4,707	4,707
Consent Revision	1,891	2,729
Consent Post Approval (Certification)	2,755	2,755
	2018 Fee	Recommended Fees
Minor Variance		
Minor Variance Application Fee	4,936	5,750
Minor Variance - Minor Residential Application fee	2,870	2,870

## **Appendix B - Planning Application Fee Survey**

Survey of Lower/Single Tier Planning Fees Related to a Residential Subdivision Development  
(100 Single Dwelling Units, 186 m<sup>2</sup> GFA each)

