

The Corporation of the Municipality of Brockton



By-Law 2025-082

Being a By-Law to Adopt the Building Permit Fees Review and the Planning Fees Review for the Municipality of Brockton.

Whereas the *Municipal Act, 2001, S.O. 2001, c. 25*, Section 5(1), as amended, provides that the powers of a municipal corporation are to be exercised by its council;

And Whereas the *Municipal Act, 2001, S.O. 2001, c. 25*, Section 5(3), as amended, provides that a municipal power, including a municipality's capacity rights, powers and privileges under section 9; shall be exercised by By-Law;

And Whereas the Corporation of the Municipality of Brockton deems it desirable to adopt the Building Permit Fees Review and the Planning Fees Review as prepared by B.M. Ross and Associates Ltd.;

Now Therefore the Council of the Corporation of the Municipality of Brockton **Enacts as Follows:**

- 1.0 That the Corporation of the Municipality of Brockton Council hereby adopts the Building Permit Fees Review, as contained in the attached Schedule "A" to this By-Law and the Planning Fees Review as contained in the attached Schedule "B" to this By-Law, both forming an integral part of this By-Law
- 2.0 That this By-Law shall come into effect upon final passage.
- 3.0 This By-Law may be cited as the "Adopt Building Permit Fee Review and Planning Fees Review By-Law".

Read, Enacted, Signed and Sealed this 14th day of October, 2025.

Mayor – Chris Peabody

Director of Legislative and Legal Services (Clerk) –
Fiona Hamilton



MUNICIPALITY OF BROCKTON BUILDING PERMIT FEES REVIEW



MUNICIPALITY OF BROCKTON
BUILDING PERMIT FEES REVIEW

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October 2, 2025

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Appendix A – Municipality of Brockton Current Building Permit Fees

Appendix B – Comparison of Building Permit Fees

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MUNICIPALITY OF BROCKTON

BUILDING PERMIT FEES REVIEW

1.0 INTRODUCTION

The intent of this report is to summarize the review and analysis undertaken to examine the current building permit fees in the Municipality of Brockton. Staff at B. M. Ross and Associates Limited (BMROSS) conducted a review of building permit fees to ensure the current fee structure is sufficient to recoup costs associated with the continued provision of services under the Building Code Act, 1992 (BCA). This includes an assessment of the existing dedicated reserve fund. The work completed as part of this study includes an assessment of the building permit fees in adjacent municipalities and their methods of cost recovery.

This review included the following activities:

- Review of background materials, including building permit and planning application information, and the legislative requirements under the BCA;
- A meeting with staff to identify direct and indirect costs, issues and concerns with the current fee structure;
- Forecasting future revenues and expenses to assess future balances within the reserve fund;
- Assessing future expenses in relation to future balances within the reserve fund, and
- Identifying recommendations for new fees or changes to existing fees based on the analyses undertaken.

2.0 LEGISLATIVE REQUIREMENTS

The ability to charge and collect fees associated with activities related to building permits is provided to municipalities through the BCA. Under Section 7 (1)(C) of the BCA, municipalities may implement a by-law requiring the payment of fees for

- the application for and issuance of permits;
- maintenance inspections;
- the provision of documents and records; and
- providing information with respect to records of complaints and the enforcement of those actions

The BCA also allows municipalities to charge interest and other penalties for fees that are overdue or unpaid. It also specifies the circumstances under which refunds may be issued.

Under Section 7(2) of the BCA, the fees collected for the above-noted activities must not exceed the “anticipated reasonable cost” to the administrator and enforce the BCA. The BCA also includes a requirement for reduced fees for buildings constructed under the appointment of a registered code agency.

Municipalities may also establish a reserve fund for surplus permit fee revenue. The intent of the reserve fund is to serve as a stabilization fund that can be drawn upon when permit fee revenues do not meet the direct and indirect expenditures. This recognizes that construction activities may fluctuate on an annual basis. It also prevents burdening taxpayers with increases to the tax levy to cover costs when expenditures exceed permit revenue. The money held in this reserve account can only be used to pay for the direct and indirect costs associated with providing building permit services and inspections. The legislation does not provide any direction or limit on the amount that may be held in the reserve.

There is also a requirement for the preparation of an annual report on the fees collected. This report must document the total fees collected, the direct and indirect (including support and overhead) fees to administer and enforce activities under the BCA. The balance of the reserve fund, if established, must also be reported on an annual basis.

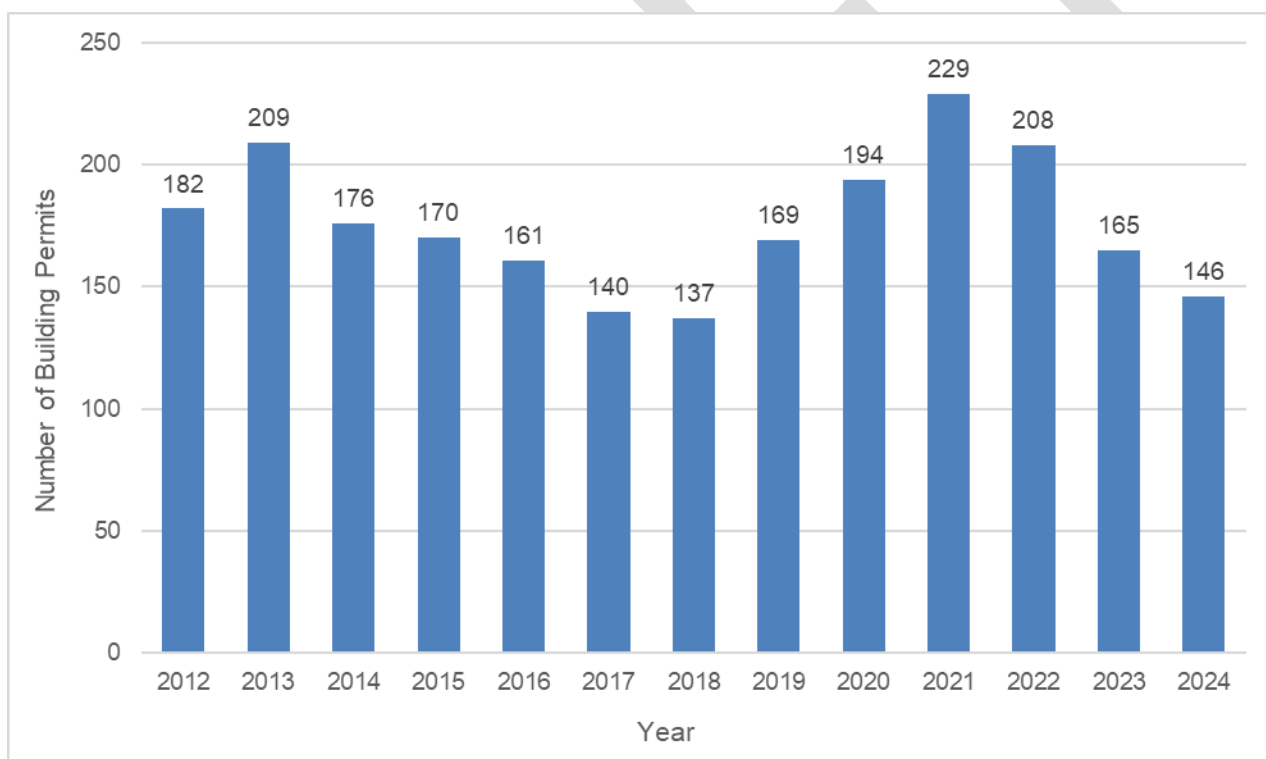
If a municipality wishes to change the building permit fees, there is a requirement under the BCA to hold at least one public meeting. There must be 21 days notice of the meeting provided, and the municipality must ensure that anyone who has requested notice receives a copy. The notice must set out the intention to change, or impose fees, as well as an estimate of the costs of administering and enforcing the act, the amount of the fee or change in fee, and the rationale behind the change. Alternatively, the notice may set out that aforementioned information can be made available upon request.

3.0 BUILDING PERMIT ACTIVITY, REVENUES AND EXPENDITURES

3.1 Historical Building Permit Activity

Brockton staff provided building permit information from 2012 to 2024 (13 years). Over this period, the total number of building permits has varied between a low of a total of 137 permits issued in 2018 to a high of 229 permits issued in 2021. Over the past 13 years, the average number of building permits issued per year is 175. Between 2013 and 2018, the total number of building permits decreased on an annual basis, then between 2019 and 2021 the number of permits issued increased annually. The number of permits issued on an annual basis has decreased in recent years, since 2021. In 2024, there were 146 building permits issued, which is a 36% decrease from 229 permits issued in 2021. The total annual number of building permits over the last 13 years is summarized in Figure 3.1.

Figure 3.1 Annual Number of Building Permits Issued, 2012-2024



The main source of variation in the total annual number of building permits issued is the variation in the number of residential permits issued annually. Residential permits, including for new residences and alterations, make up the majority of permits issued, ranging from 38.2% of permits issued in 2013 to 61.6% in 2021. Annually, residential permits average 48.3% of the total permits issued. From 2012 to 2024, 2018 had the lowest number of residential permits issued (58), and the highest number issued was in

2021 (141). The higher number of residential permits in 2021 reflects the increased residential building activity that occurred during the COVID-19 pandemic.

Permits for agricultural buildings are the second most common issued in Brockton. On average, over the last 13 years, 19% of the permits issued are categorized as agricultural. The total number of agricultural permits has varied between 21 issued in 2020 and 49 issued in 2013. Annually, the average number of agricultural building permits issued per year is 33.

Annually, there is an average of 22 septic permits issued. The annual number of septic permits issued over the past 13 years has varied between 12 issued in 2017 and 35 in 2022.

Permits issued for signs, garages, pools and tents were categorized as ‘miscellaneous’ for the purposes of this analysis. The number of miscellaneous building permits varies annually, but averages approximately 18 permits per year. The most miscellaneous building permits over the study period were issued in 2013, with 24 permits issued.

Commercial permits, including new and alterations, on average are 5% of the annual permits issued. The total number of commercial building permits has ranged from 3 issued in 2018 to 12 in 2012. The annual average number of commercial building permits is 9.

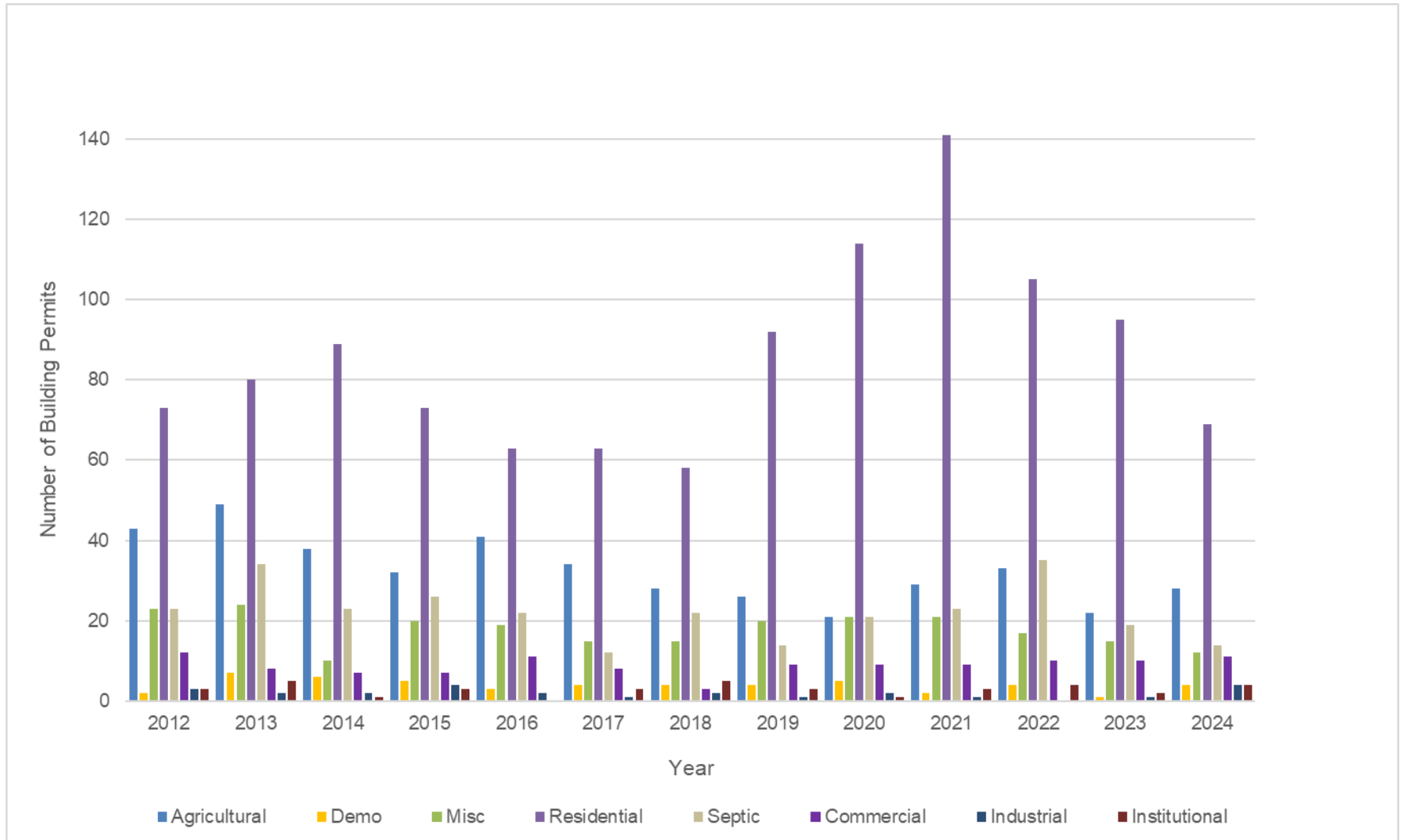
Industrial, institutional and demolition permits account for approximately 5% of the building permits issued over the last 13 years. An average of 9 industrial, institutional and demolition permits are issued per year.

The number of permits issued by permit type per year (i.e., residential, agricultural, etc.) is shown in Figure 3.2 and summarized in Table 3.1.

Table 3.1 Number of Building Permits Issued by Category, 2012-2024

Category	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Agricultural	43	49	38	32	41	34	28	26	21	29	33	22	28
Demo	2	7	6	5	3	4	4	4	5	2	4	1	4
Misc.	23	24	10	20	19	15	15	20	21	21	17	15	12
Residential	73	80	89	73	63	63	58	92	114	141	105	95	69
Septic	23	34	23	26	22	12	22	14	21	23	35	19	14
Commercial	12	8	7	7	11	8	3	9	9	9	10	10	11
Industrial	3	2	2	4	2	1	2	1	2	1	0	1	4
Institutional	3	5	1	3	0	3	5	3	1	3	4	2	4
Total	182	209	176	170	161	140	137	169	194	229	208	165	146

Figure 3.2 Annual Total of Building Permits by Category, 2012-2024



3.2 Permit Revenues

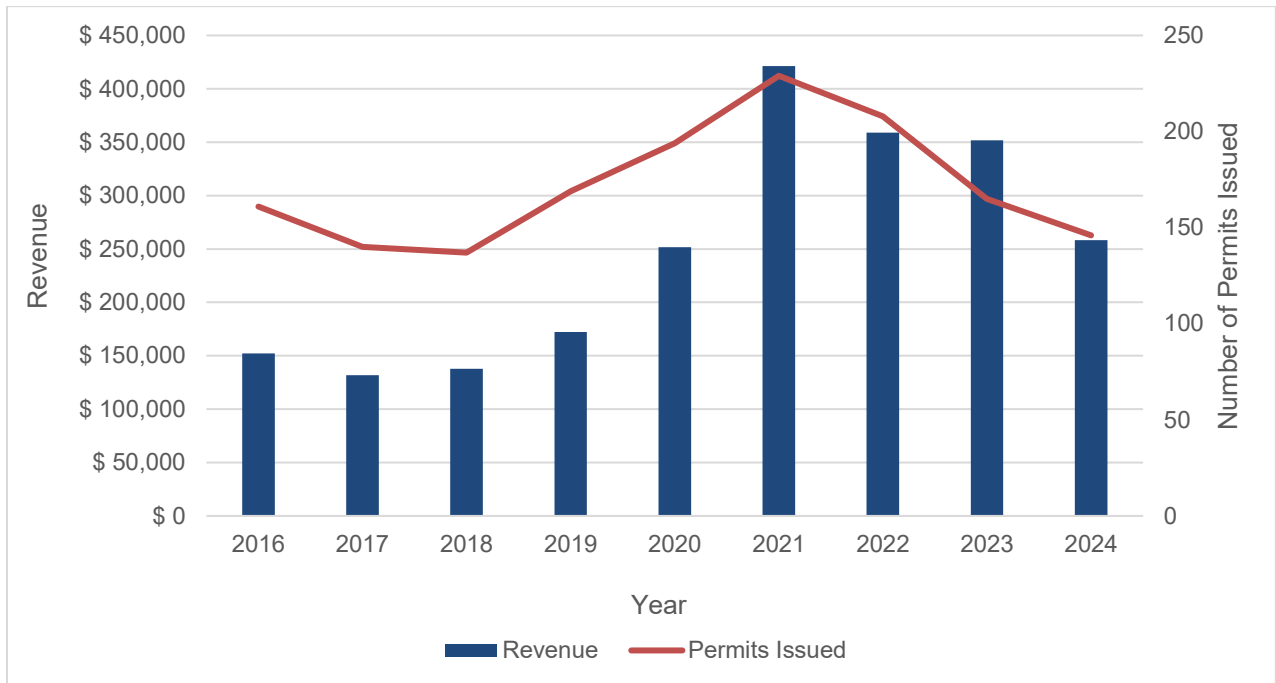
Annual revenue for the building department from 2016 to 2024 is summarized in Table 3.2. The majority of revenue is sourced from building permit fees. The revenue noted in the table below does not include transfers from the building services stabilization fund. It is also noted that in 2022, a grant of \$13,764 was received and is included in the total revenue from that year.

Table 3.2 Building Department Revenue, 2016-2024

Year	Total Revenue
2016	\$ 152,043.70
2017	\$ 131,889.30
2018	\$ 137,802.20
2019	\$ 172,179.90
2020	\$ 251,819.90
2021	\$ 421,368.00
2022	\$ 358,965.30
2023	\$ 351,789.50
2024	\$ 258,133.30

The average annual revenue for the building department is \$248,443. Revenue for the building department will vary annually based on the number of permit issued as well as the permit fee as determined by the size of the building for commercial, industrial, institutional, residential and agricultural permits. In the past 9 years, the lowest revenue was \$131,889 in 2017. The year with the highest revenue was 2021, with \$358,965 in permit fees collected. This corresponds with the highest number of permits issued. Following 2021, revenue has decreased, following the declining trend in the number of permits issued. It should also be noted that revenues increased starting in 2020 following the implementation a higher fee structure. Figure 3.3 shows permit revenues and the number of permits issued.

Figure 3.3 Annual Number of Permits and Total Revenue by Year, 2016-2024



3.3 Expenditures

Annual actual expenditures for the building department between 2016 and 2024 were provided by staff. Expenditures include direct costs related to the provision of services as required by the BCA, including wages, benefits, milage and supplies, as well as indirect costs including insurance, vehicle maintenance and other costs related to general overhead. The annual expenditures for the building department are summarized in Table 3.3.

Table 3.3 Total Expenditures by Year, 2016-2024

Year	Total Expenditures
2016	\$ 131,112.03
2017	\$ 132,558.63
2018	\$ 120,168.56
2019	\$ 149,627.89
2020	\$ 139,225.76
2021	\$ 129,034.61
2022	\$ 252,400.74
2023	\$ 302,998.35
2024	\$ 295,630.76

Expenditures for the building department have increased from 2016 to 2024. In 2024, the total expenditures were \$295,630, which is a 125% increase from the 2016 expenditures. Generally, an increase in expenditures was observed in 2022 and this is attributed to an increase in the staff complement of the building department. This resulted in increase wage and benefit expenditures. In general, wages vary between 56% and 66.5% of the total expenses per year. In 2024, the greatest proportion of the total expenses was attributed the wages, accounting for 66.5% of the annual expenses. Benefits generally account for between 19% and 23% of the total expenses per year. The implementation of an e-permitting system is also a recent expense that has increased total expenditures since 2022. This includes the initial implementation of the software and subsequent annual subscription fees.

In the period from 2016 to 2024, there have only been two years when permit revenues were lower than total expenses. In 2017, a transfer from the building services stabilization fund was required in the amount of \$670 and then again in 2024 when \$37,500 was required.

3.4 Building Services Stabilization Fund

Under the OBC Act, municipalities may establish a reserve fund to offset deficits in the direct and indirect costs associated with the provision of building services. The Municipality of Brockton has a building services stabilization fund that is drawn from when expenditures exceed the fees collected for building permits. When there is a surplus in permit revenue, the balance is transferred into that reserve fund. The fund is a dedicated reserve fund and can only be drawn upon for expenses related to operation of the Building Department and related support services.

The starting reserve balance of the stabilization fund, interest, transfers in and out, and end of year balance from 2017 to 2024 are shown in Table 3.4. The balance of the reserve fund, as of the end of 2024 is \$661,214.

Table 3.4 Building Services Stabilization Fund Balance, 2017-2024

Year	Starting Balance	Transfers In	Transfers Out	Interest	End of Year Balance
2017	\$ 55,529.98	0	\$ 699.32	\$ 275.35	\$ 55,106.01
2018	\$ 55,106.01	\$ 17,633.59	0	\$ 794.93	\$ 73,534.53
2019	\$ 73,534.53		\$ 882.00	\$ 2,187.43	\$74,839.96
2020	\$ 74,839.96	\$ 141,577.27	\$ 6,431.11	\$ 784.18	\$ 210,770.30
2021	\$ 210,770.30	\$ 292,334.21	\$ 657.56	\$ 1,919.59	\$ 504,366.54
2022	\$ 504,366.54	\$ 117,744.36	\$ 11,179.63	\$ 9,785.44	\$ 620,716.71
2023	\$ 620,716.71	\$ 78,880.02	0	\$ 22,092.34	\$ 721,689.07
2024	\$ 721,689.07	\$ 27,847.82	\$ 133,702.48	\$ 45,380.45	\$ 661,214.86

There was a significant increase in the balance of the stabilization fund as a result of the increased permit revenue collected in 2021. That year, \$292,334 in excess revenue was deposited into the stabilization fund. In 2017, funds were withdrawn from the reserve to offset expenditures for the previous year. Transfers out of the fund from 2018 to 2021 are related to interest reallocations. The transfers out of the fund in 2024 include a transfer related to buy out of a leased vehicle (\$29,514) and transfers to offset 2024 expenses.

The OBC Act does not specify or provide any guidance on the amount to be held in stabilization reserve funds. Municipalities, therefore, have flexibility in determining the amount to be held in reserve. The reserve fund is typically used to reduce any impacts of unanticipated additional costs (e.g., legal fees, changes to permit systems, need for additional staff) related to administrating building code activities, and yearly fluctuations in the revenue collected from building permit fees.

In many municipalities, the target amount for the stabilization fund is equivalent to the annual operating costs of the Building Department. Some municipalities, depending on size and forecasted needs, have reserve targets of 1.5 to 1.8 times the annual operating costs. Some municipalities, through motions of Council, have established caps for the stabilization funds. Table 3.5 summarizes the average annual operating costs from 2022-2024, reserve targets of 1.5 and 1.8 times that, and the current reserve balance. The annual operating costs are based on the 2022 to 2024 expenditures to reflect current staff remuneration expenses.

Table 3.5 Reserve Targets Based on Average Annual Operating Costs

Cost	Amount
Average annual operating cost (2022-2024)	\$ 283,676.62
Reserve target - 1.5x annual operating costs)	\$ 425,514.925
Reserve target - 1.8x annual operating costs)	\$ 510,617.91
Current reserve balance	\$ 661,214.86

The current reserve balance is 2.33 times the average annual operating costs. In the Municipality of Brockton, there is no policy regarding a target or cap for the stabilization reserve fund.

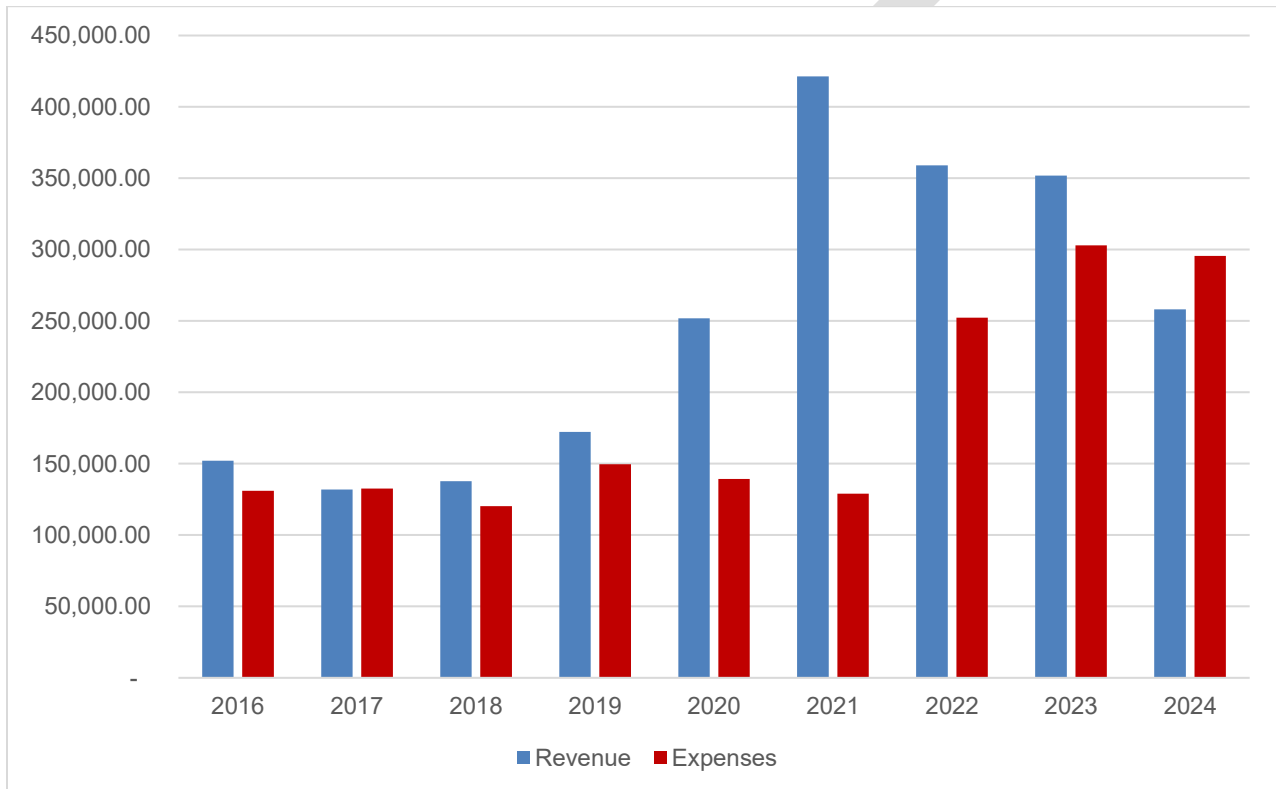
From discussions with staff, future expenses for the building department include a majority share (80%) in two replacement vehicles, as well as software subscription increases.

4.0 EVALUATION OF BUILDING FEES

4.1 Cost Recovery Analysis

To evaluate the cost recovery of the current building permit fees, the annual revenue was compared against the annual expenditures attributed to the building department. Figure 4.1 shows the annual revenues and expenditures from 2016 to 2024.

Figure 4.1 Building Department Revenue and Expenditures, 2016-2024



For the period from 2016 to 2024, cost recovery of building department expenses varied between 87% and 326%, with the greatest cost recovery occurring in 2021. The average cost recovery is 144% but in recent years (2022 to 2024), this has decreased to 115%. On an annual basis between 2016 and 2024, the average difference between expenditures and revenues is \$64,800. If 2021 is excluded from the calculation, the difference decreases to an average of \$36,360. The number of permits issued and increase wage and benefit expenses are the most significant factors impacting cost recovery.

4.2 Evaluation of Current Building Permit Fees

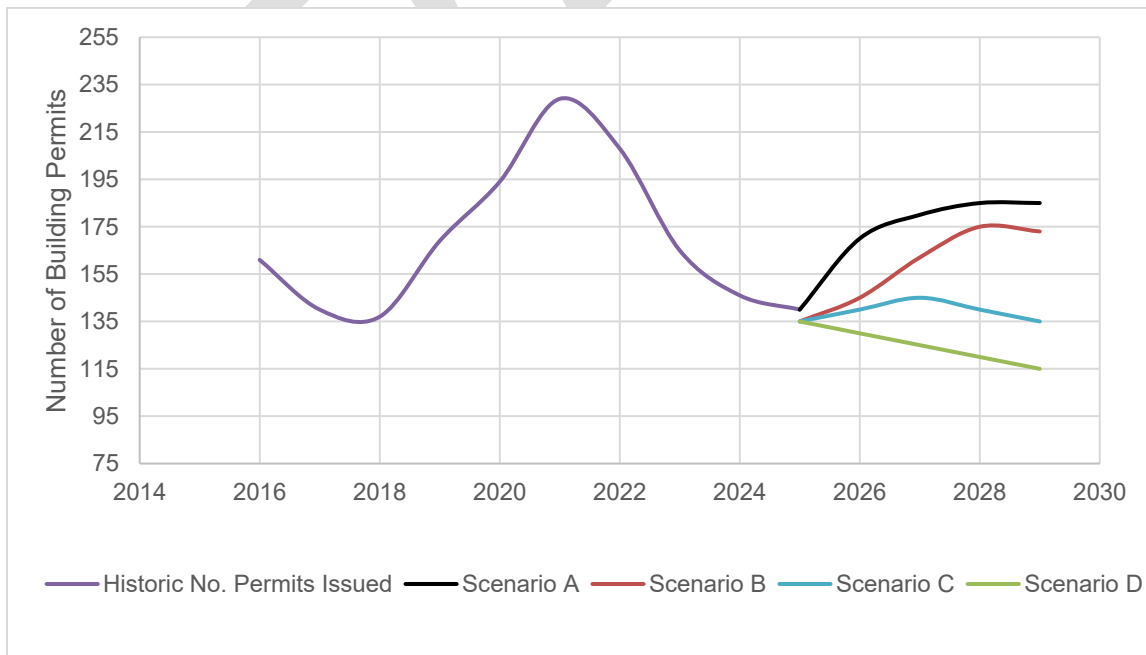
To evaluate the current building permit fees (included as Appendix A) and their current ability to sustain the direct and indirect operating costs of the Building Department, four future scenarios were considered. These scenarios were used to estimate future permit

fee revenues to 2029 and then compared against projected future expenses to determine impacts to the reserve fund balance. The scenarios considered as part of this evaluation include:

- A. A short-term average of 172 permits per year – under this scenario, the average number of permits will be maintained at the current 9-year average. The annual number of permits will vary between 140 and 185 permits per year.
- B. A short-term average of 158 permits per year – under this scenario, the average number of permits will decline to 158. The annual number of permits will vary between 135 and 175 permits per year.
- C. A short-term average of 139 permits per year – under this scenario, the average number of permits will decline to 139. The annual number of permits will vary between 135 and 145 per year.
- D. A short-term average of 125 permits per year – this scenario models a sustained decline in permits per year. Permits will vary between 115 and 135 permits per year.

These scenarios represent a range of future conditions to test the current fee structure against potential future expenditures. The scenarios in terms of permits issued per year are shown in Figure 4.2.

Figure 4.2 Forecasted Permit Scenarios



For each scenario, the permit revenue was estimated from the number of permits based on the average permit revenue per permit between 2020 and 2024. This time period was chosen as it is representative of the current permit values after the last update to fees in 2019. The forecasted revenue was then compared against projected expenditures. Between 2025 and 2029, it is expected that direct and indirect expenditures will increase from \$295,630.76 to \$343,592.

Expenses are expected to increase over the next 5 years as a result of the continued increase in direct costs, primarily wages, benefits and the replacement of two vehicles. For the purposes of this analysis, a 1.5% annual increase to wages was applied. From information from staff, vehicle purchases were included in 2027 and 2028 with 80% of the costs attributed to the building department. For the reserve balances, an interest rate of 3.5% was utilized.

The revenue, interest earned, transfers in and out of stabilization fund and stabilization reserve fund balance at the end of the year for each scenario is summarized in Table 4.1.

Under Scenario A, the forecasted number of permits is expected to hold at the current 9-year average. Revenue under this scenario varies from \$245,390 to \$324,267, which results in four years of deficits based on the modelled expenditures. The annual expense deficit varies from \$5,531 to \$54,162. This results in a total of \$102,235 required from the stabilization fund to offset expenditures. Interest will offset the decline in the stabilization fund, with a balance of \$680,700 in 2029.

Scenario B forecasts a decrease in the number of permits to 135 per year followed by an increase to 175, modeling a slight overall decrease in the number of permits. Revenue will vary from a forecasted \$236,627 to \$306,738 between 2025 and 2029. Yearly transfers from the stabilization fund will be required to offset the difference between revenue and expenditures, resulting in a total withdrawal from the fund of \$216,390. The balance of the reserve at the end of 2029 is forecasted to be \$549,087.

In Scenario C, the number of permits issued declines to levels similar to 2017 and 2018, which were the lowest experienced between 2012 and 2024. Revenue levels will decrease to between \$236,627 per year and \$254,154 per year. The deficit from expenditures will range from \$58,115 to \$98,200, requiring a total of \$382,904 from the stabilization reserve fund. The forecasted balance of the stabilization fund at the end of 2029 under this scenario is \$377,349 which is approximately half of the current balance.

The last scenario represents a sustained decline in building permits over the next 5 years and results in a significant decrease in revenues. The forecasted revenues range from \$201,571 to \$236,627. The result is an increased need to draw from the stabilization fund to balance the projected expenses. Under this scenario, \$505,600 will need to be withdrawn from the stabilization fund. The fund will have a balance in 2029 of \$249,024.

A general benchmark for stabilization funds used by some municipalities is maintaining a balance of 1.5 to 1.8 times the average operating costs. Table 4.2 summarizes the impact of the different scenarios on the stabilization fund and whether or not the benchmarks are met.

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Table 4.1 Modeled Revenue Scenarios, 2025-2029

Scenario	Year	2025	2026	2027	2028	2029
Scenario A	Expenditures	299,553.09	303,506.39	338,718.98	343,591.77	315,725.64
Scenario A	Revenue	245,390.99	297,974.77	315,502.70	324,266.66	324,266.66
Scenario A	Balance (Revenue - Expenditures)	-54,162.10	-5,531.61	-23,216.28	-19,325.10	8,541.02
Scenario A	Interest	23,142.52	22,056.83	22,635.22	22,614.88	22,730.02
Scenario A	Transfer In	0.00	0.00	0.00	0.00	8,541.02
Scenario A	Transfer out	54,162.10	5,531.61	23,216.28	19,325.10	0.00
Scenario A	Reserve Fund Balance (End of Year)	630,195.28	646,720.50	646,139.44	649,429.21	680,700.26

Scenario	Year	2025	2026	2027	2028	2029
Scenario B	Expenditures	299,553.09	303,506.39	338,718.98	343,591.77	315,725.64
Scenario B	Revenue	236,627.03	254,154.95	283,952.43	306,738.74	303,233.15
Scenario B	Balance (Revenue - Expenditures)	-62,926.06	-49,351.43	-54,766.55	-36,853.03	-12,492.49
Scenario B	Interest	23,142.52	21,750.10	20,784.05	19,594.66	18,990.62
Scenario B	Transfer In	0	0	0	0	0
Scenario B	Transfer out	62,926.06	49,351.43	54,766.55	36,853.03	12,492.49
Scenario B	Reserve Fund Balance (End of Year)	621,431.32	593,829.98	559,847.48	542,589.11	549,087.23

Scenario	Year	2025	2026	2027	2028	2029
Scenario C	Expenditures	299,553.09	303,506.39	338,718.98	343,591.77	315,725.64
Scenario C	Revenue	236,627.03	245,390.99	254,154.95	245,390.99	236,627.03
Scenario C	Balance (Revenue - Expenditures)	-62,926.06	-58,115.40	-84,564.03	-98,200.78	-79,098.62
Scenario C	Interest	23,142.52	21,750.10	20,477.31	18,234.28	15,435.45
Scenario C	Transfer In					
Scenario C	Transfer out	62,926.06	58,115.40	84,564.03	98,200.78	79,098.62
Scenario C	Reserve Fund Balance (End of Year)	621,431.32	585,066.01	520,979.30	441,012.79	377,349.62

Scenario	Year	2025	2026	2027	2028	2029
Scenario D	Expenditures	299,553.09	303,506.39	338,718.98	343,591.77	315,725.64
Scenario D	Revenue	236,627.03	227,863.06	219,099.10	210,335.13	201,571.17
Scenario D	Balance (Revenue - Expenditures)	-62,926.06	-75,643.32	-119,619.88	-133,256.63	-114,154.47
Scenario D	Interest	23,142.52	21,750.10	19,863.83	16,372.37	12,281.42
Scenario D	Transfer In					
Scenario D	Transfer out	62,926.06	75,643.32	119,619.88	133,256.63	114,154.47
Scenario D	Reserve Fund Balance (End of Year)	621,431.32	567,538.09	467,782.04	350,897.77	249,024.72

Table 4.2 Summary of Impacts to Stabilization Fund

Scenario	Stabilization Fund Impact
Scenario A	Stabilization fund remains above 1.8x the average operating costs
Scenario B	Stabilization fund is between 1.5x and 1.8x the average operating costs
Scenario C	Stabilization fund falls below 1.5x the average operating costs in 2028.
Scenario D	Stabilization fund falls below 1.5x the average operating costs in 2027.

5.0 COMPARISON OF BUILDING PERMIT FEES

Often a first step in evaluating building permit fees is a comparison against the fees set by neighbouring municipalities. This type of comparison can be done, however, it is limited in its usefulness when setting new fees, as it does not allow for any consideration of the actual costs to the municipality associated with administering the building department. The comparison of building permits fees does not incorporate staffing levels or levels of service. It is recommended that the following comparison be viewed in terms of what the local range of building permit fees are and how different municipalities collect fees (i.e. flat rate, based on construction value, or square footage).

For the purposes of evaluating building fees in Brockton, the current fees were compared against fees in other municipalities in Bruce County and other adjacent municipalities. The following assumptions were used to calculate different building permit fees for the different categories of structures (Table 5.1).

Table 5.1 Structure Size and Values for Calculating Building Permit Fees

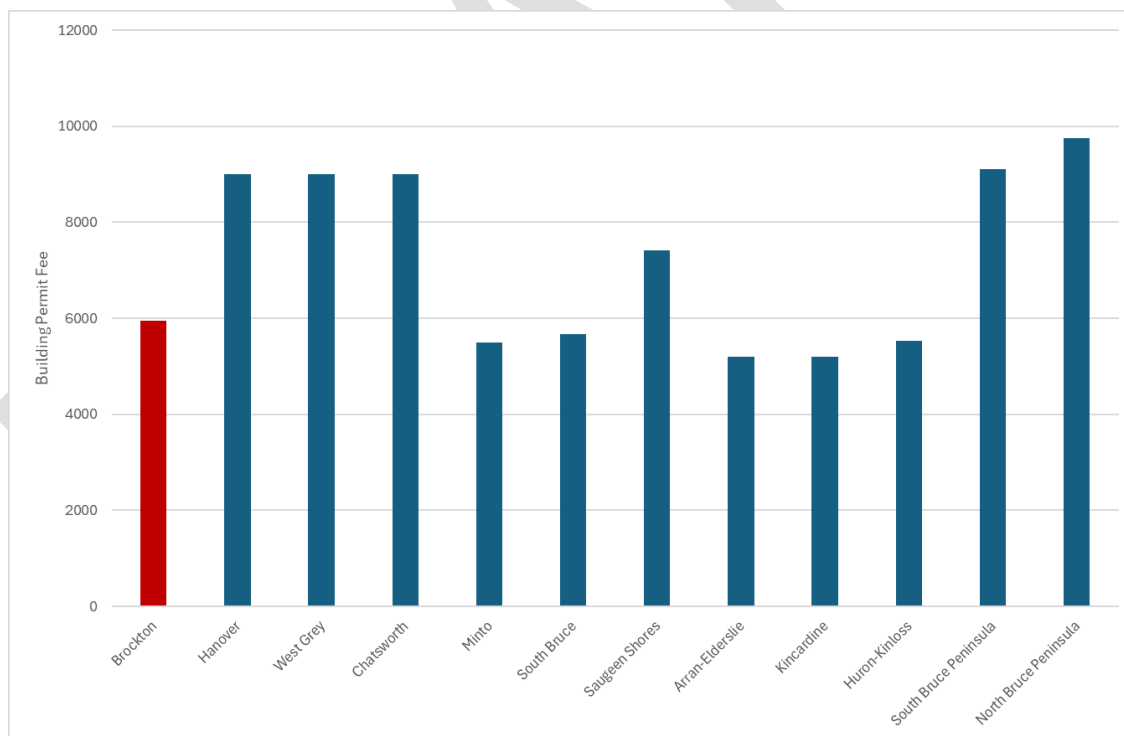
Structure/Permit Type	Size (sq.ft), Construction Value (\$)
Commercial, industrial or institutional	6,500 sq.ft, \$750,000
Single family residential	1,200 sq.ft, \$450,000
Multi-residential	2,000 sq.ft
Residential addition/renovation	1,000 sq.ft, \$60,000
Agricultural – livestock building	7,200 sq. ft
Agricultural – non-livestock building	7,200 sq. ft

The Municipality of Brockton last updated its building permit fee schedule in 2019, with updated fees coming into effect in 2020. The current fee structure includes a base rate (\$100) plus a fee per square foot for new residential and non-residential structures. There are also flat fees for certain types of agricultural structures (e.g. silos), tents, septic systems, demolition and administrative permits. Fees for renovations and additions, the fee structure is the base rate plus a rate per \$1,000 of construction value. Across neighbouring municipalities, the fee structures vary. In Hanover, building permit fees are generally based on construction value rather than square footage. In West Grey and

Chatsworth, the building fees are generally based on square footage, with the exception of industrial, institutional and commercial, which are based on the construction value. Minto has a base rate of \$300 in addition to a square foot rate. In Bruce County, South Bruce has a similar fee structure to Brockton, which includes a base rate (\$150) and charge per square foot. Saugeen Shores, Kincardine, Huron-Kinloss, South Bruce Peninsula and North Bruce Peninsula do not have base rates and charge based on the square footage.

Building permit fees were calculated for the above noted municipalities based on the assumptions set out in Table 5.1 and compared to the current Brockton fees. For a new industrial, commercial and institutional structure, the fees for a 6,500 square foot structure (valued at \$750,000) are set out in Figure 5.1. Brockton’s current fee for this type of non-residential use is \$5,950, which is below the median of the compared municipalities. The municipalities in Grey County, as well as Saugeen Shores, South Bruce Peninsula and North Bruce Peninsula have higher building permit fees than Brockton for this category of structure. The lowest fees for industrial, commercial and institutional buildings are in Arran-Elderslie and Huron-Kinloss.

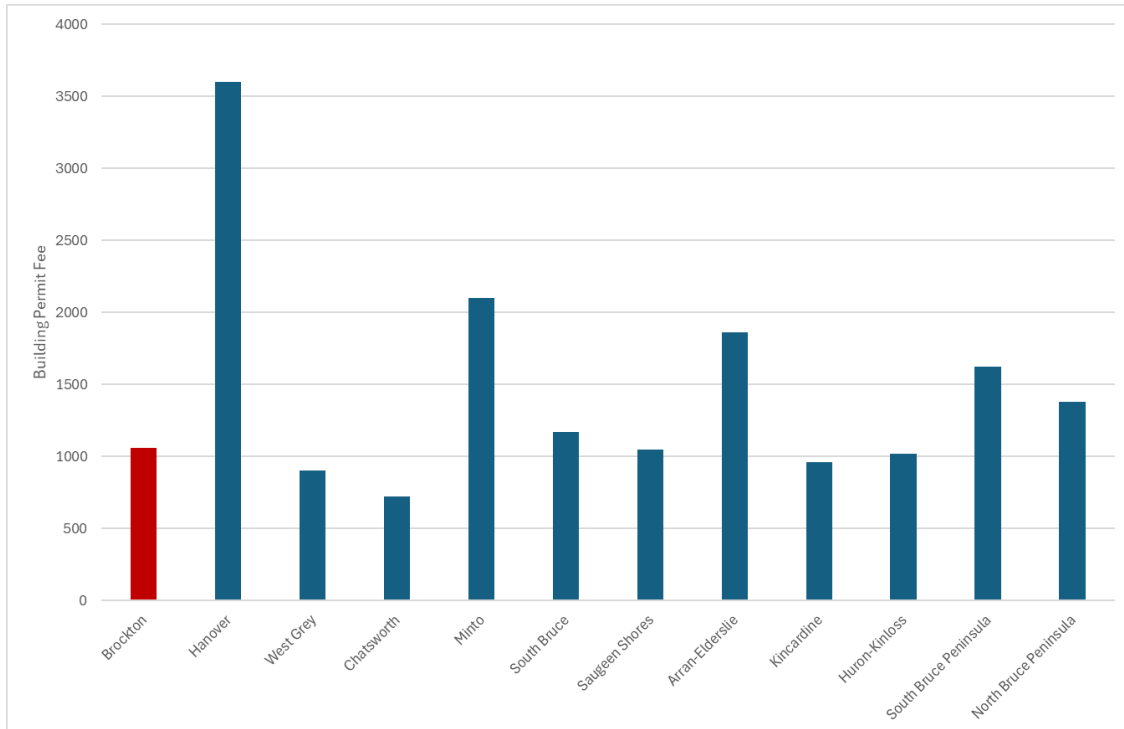
Figure 5.1 Industrial, Commercial and Institutional Building Permit Fee Comparison



For a single detached residential home, the building permit fees are compared in Figure 5.2. The permit fees vary from a high of \$3,600 in Hanover to a low of \$720 in Chatsworth. The current building permit fee for a 1,200 square foot single detached residence in Brockton is \$1,060. The fee in Brockton is less than that in Hanover, Minto,

Arran-Elderslie, South Bruce, South Bruce Peninsula and North Bruce Peninsula. Municipalities with a lower fee include West Grey, Chatsworth Kincardine and Huron-Kinloss.

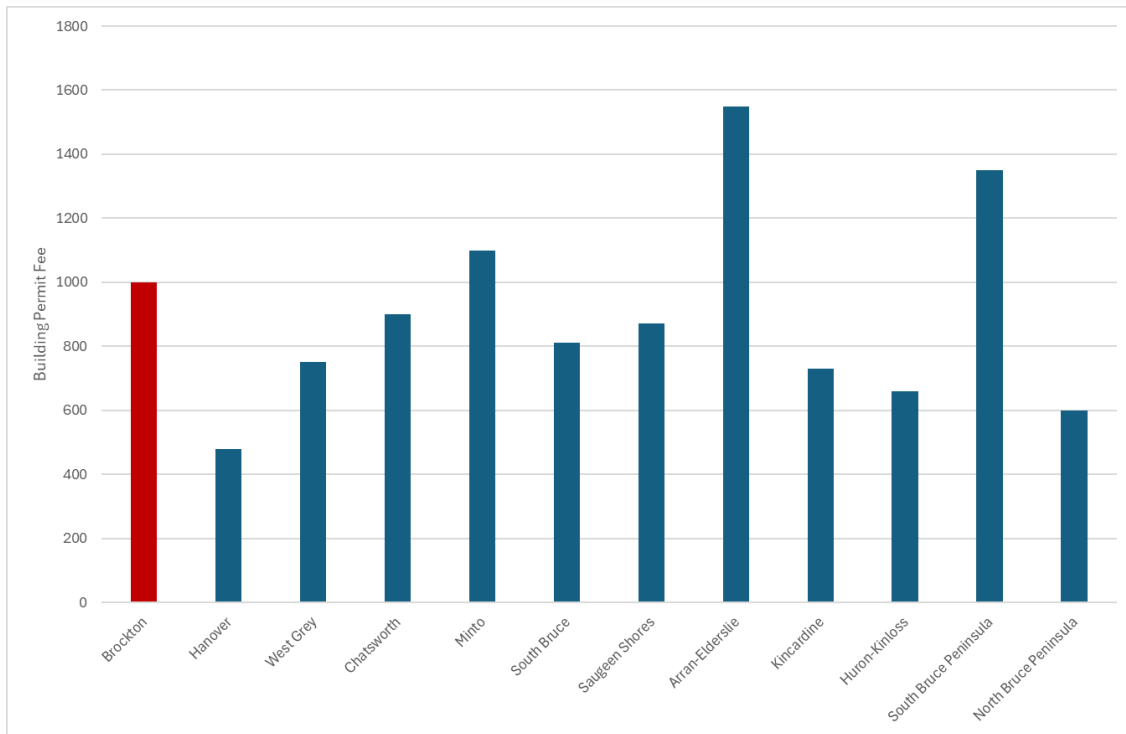
Figure 5.2 Single Family Residential Building Permit Fee Comparison



For multi-unit residential buildings, most of the compared municipalities charge the same building fee rate as the single detached residential fee. The exception to this is in Arran-Elderslie, where the multi-unit building permit fee is \$1.40 per square foot compared to \$1.55 per square foot for a single detached unit.

For residential additions or renovations, building permit fees in the compared municipalities vary in terms of their structure. In Brockton, the permit fee is determined by the construction value (\$15 per \$1,000 construction value). Hanover, Chatsworth, South Bruce, Kincardine and Huron-Kinloss have a similar structure based on construction value. In West Grey, Saugeen Shores, South Bruce Peninsula and North Bruce Peninsula, the fee is same per square foot charge structure as the new residential building fee. When compared for a 1,000 square foot addition valued at \$60,000, the building fees vary from \$480 in Hanover to \$1,550 in Arran-Elderslie. Brockton's fee falls above the median of \$840. Minto, Arran-Elderslie and South Bruce Peninsula have higher fees for additions/renovations than Brockton, with the remainder have either similar or slightly lower fees (see Figure 5.3).

Figure 5.3 Comparison of Renovation and Alteration Building Permit Fees



For new agricultural buildings, some municipalities specify different fees depending on if the structure will house livestock or not. In Brockton, a new barn to house livestock pays a building permit fee of \$100 + \$0.30 per square foot, whereas the fee for an implement shed is \$100 + \$0.25 per square foot. The fees for new agricultural buildings housing livestock do not vary significantly between most of the compared municipalities, with most being within \$500 of each other. The exceptions are South Bruce Peninsula and North Bruce Peninsula, which have the lowest fees (see Figure 5.4). For agricultural buildings that do not house livestock (i.e., sheds), Brockton has the third lowest building fee (see Figure 5.5).

Figure 5.4 Comparison of Building Permit Fees for Agricultural Buildings with Livestock

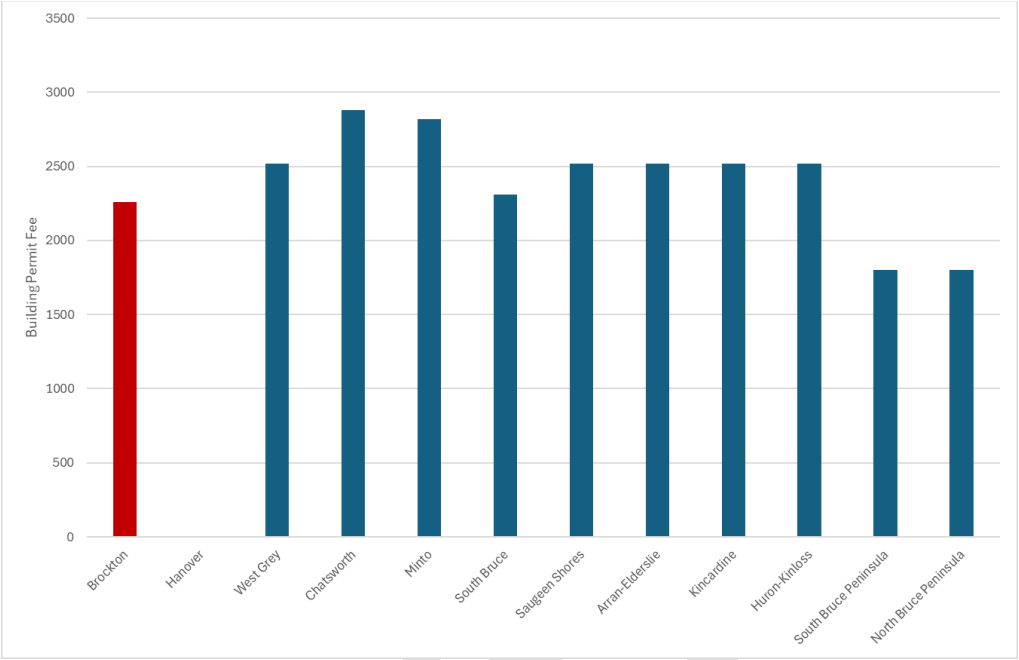
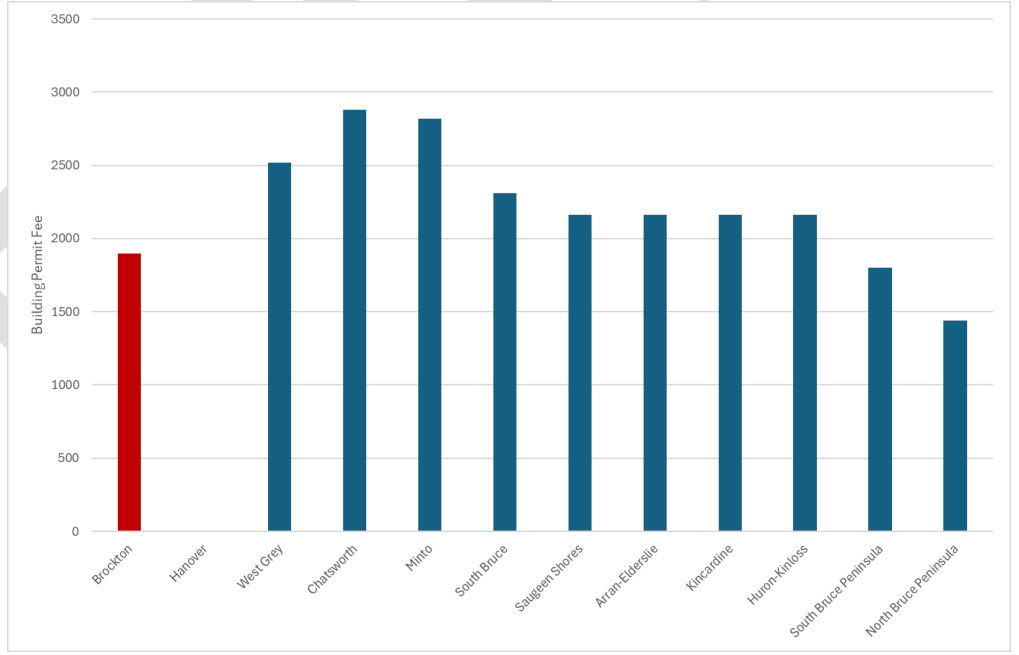


Figure 5.5 Comparison of Building Permit Fees for Non-Livestock Agricultural Buildings



There are a number of building permit fees that are set at flat rates. For permits for swimming pool fences, wood stoves, demolition and changes of use, all the municipalities compared utilize a flat fee structure. The fees charged for the aforementioned permits vary between \$100 to \$350. Brockton’s flat fees for these types of permits are generally higher than the surrounding municipalities (see Figure 5.6).

Another category of permits charged on a flat rate basis are permits for new septic systems. In some of the compared municipalities, there are different rates for the different classes of septic systems. Class 2 and 3 systems (greywater systems and cesspools) are often grouped together as are Class 4 and 5 systems (septic tank and leaching field and holding tanks). In West Grey, Saugeen Shores, Kincardine, Huron-Kinloss and North Bruce Peninsula, there is no distinction between the class of septic system with respect to permit fees.

The septic permit fees vary between \$50 for Class 2 and 3 systems in Hanover to \$750 in Huron-Kinloss. For Class 4 and 5 systems, the permit fees vary between \$350 in Hanover to \$750 in Huron-Kinloss. The average permit fee for a Class 4 or 5 system in the municipalities assessed is \$592. In Brockton, the current charge for a Class 4 or 5 septic system permit is \$618.60, fees are higher in Chatsworth, Saugeen Shores, and Huron-Kinloss. The fees in West Grey, Minto, Arran-Elderslie and Kincardine are \$600 (see Figure 5.7).

Figure 5.6 Comparison of Swimming Pool, Woodstove, Demolition and Change of Use Fees

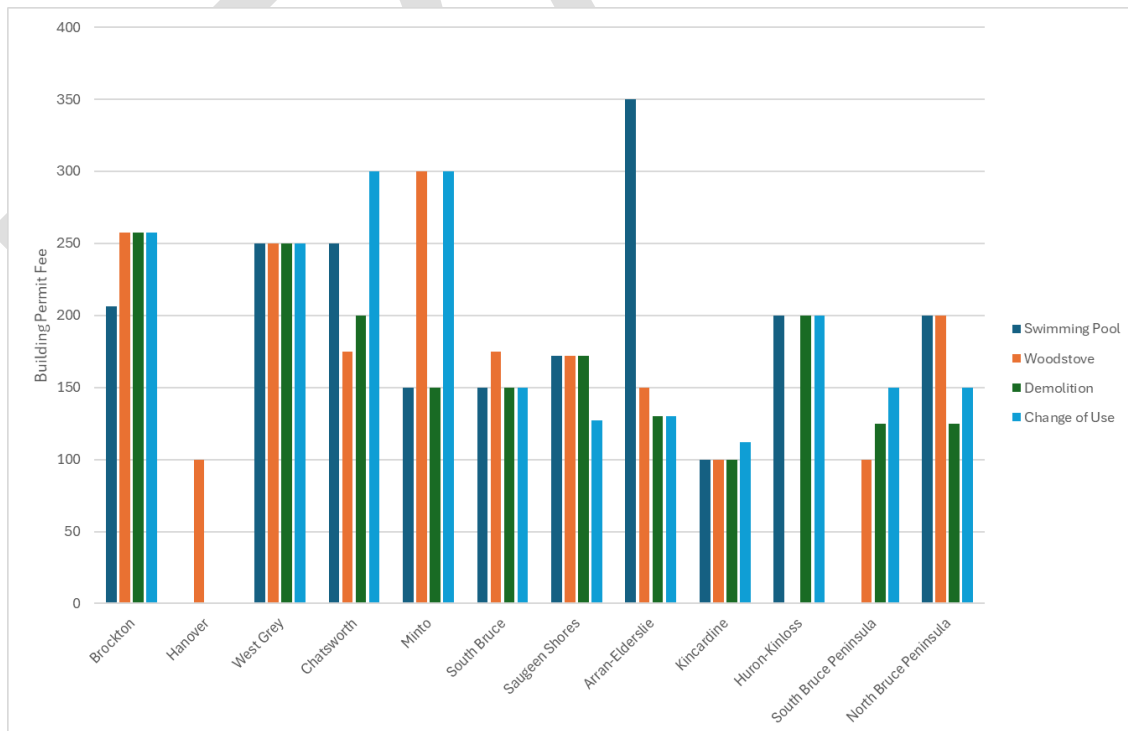
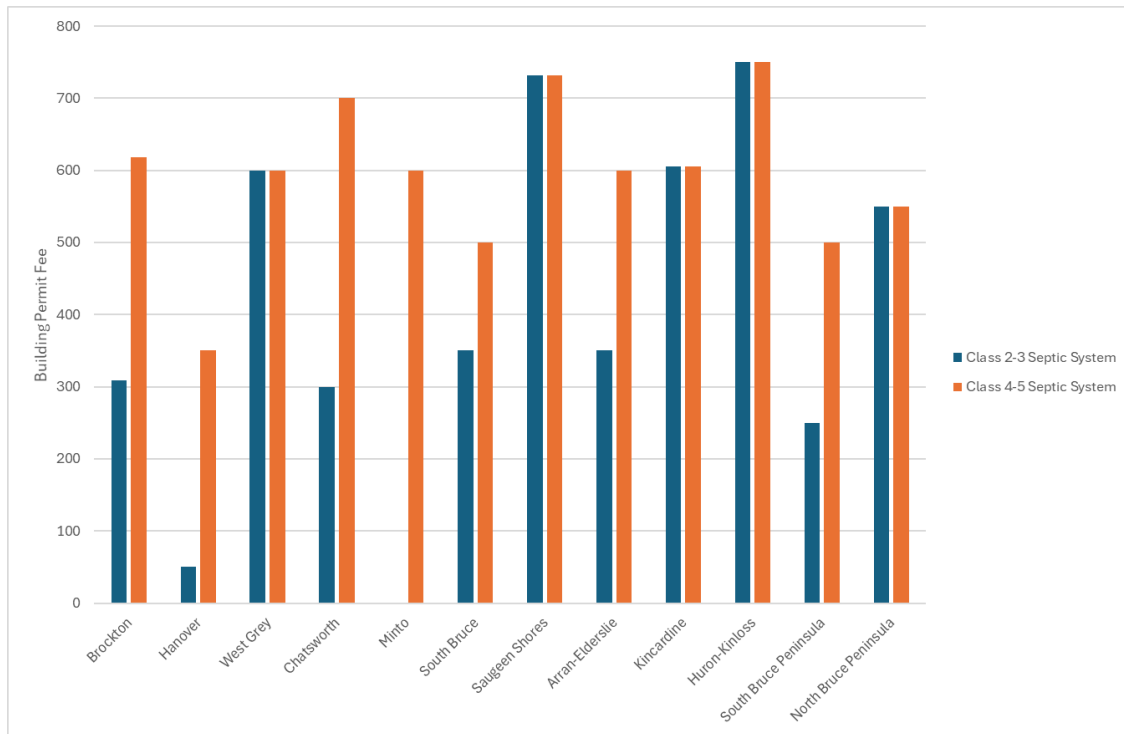


Figure 5.7 Comparison of Septic System Permit Fees



Fees for moving permits, specific building types (granaries, silos, tents) and other categories were also examined as part of the review. These fees were found to be generally similar to comparable fees in the neighbouring municipalities. The comparison of fees is available in Appendix B.

Generally, the building fees within Brockton are comparable those of other adjacent and nearby municipalities.

6.0 RECOMMENDATIONS

6.1 Additional Building Permit Fees

Through the comparison of building permit fees and discussions with staff, gaps in the current building fee structure were identified. Council and staff may wish to consider adding the following fees as identified in Table 6.1.

Table 6.1 Additional Building Permit Fees

Fee Description	Potential Fee
Temporary structures (seasonal greenhouses on commercial properties, temporary living accommodations, etc.)	\$154.65
Additional or miscellaneous inspections, including re-inspections	\$150.00
Septic review for change of use	\$200.00
Solar Panels – installed on a building, or to provide hot water, or primary or supplementary heating	\$150.00

6.2 Changes to Existing Permit Fees

From 2016 to 2024, the revenue from building permit fees has generally been at a sufficient level to pay department expenditures and support the stabilization fund. If current permit levels and fees are maintained on an average annual basis, withdrawals from the fund may still be required but the amount held in reserves is expected to remain over \$600,000. Expenditures are expected to increase over the next five years and should the number of permits decrease, there is the potential for increased withdrawals from the stabilization reserve. The potential decline in the reserve fund could lower the fund to less than 1.5 times the average annual operating cost, if the number of permits is lower than average over the next 5 years.

To maintain a stabilization fund of 1.5 times the annual operating costs in the event of declining building permit revenue, Council and staff could consider increasing the per square foot rate for new residential, new agricultural and industrial, institutional and commercial building permits. A 10% increase to the per square foot rate could be implemented to maintain building permit revenue in the event of a decline in building permits. The fees could be adjusted as set out in Table 6.2.

Table 6.2 Proposed Fee Increases

Fee Type	Current Fee	Proposed Fee
Single and multi residential	\$100 plus \$0.80 per square foot – excluding unfinished basement	\$100 plus \$0.90 per square foot – excluding unfinished basement.
Farm buildings, housing livestock	\$100 plus \$0.30 per square foot	\$100 plus \$0.33 per square foot.
Farm buildings for purposes other than housing livestock	\$100 plus \$0.25 per square foot	\$100 plus \$0.28 per square foot.
Commercial/Industrial/Institutional	\$100 + \$0.90 per square foot	\$100 + \$1.00 per square foot.

For illustrative purposes, the building permit fees using the fees proposed in Table 6.2 were compared to the current fees utilizing the building assumptions set out in Section 5.0. The resultant changes in fees are summarized in Table 6.3.

Table 6.3 Comparison of Proposed and Current Fees

Fee	Permit Cost Under Current Fee Structure	Permit Cost Under Proposed Fee Structure	Difference
Single residential house (1,200 square feet)	\$1,060	\$1,180	+\$120
Farm buildings, housing livestock (7,200 square feet)	\$2,260	\$2,476	+\$216
Farm buildings for purposes other than housing livestock (7,200 square feet)	\$1,900	\$2,116	+\$216
Commercial/Industrial/Institutional (6,500 square feet)	\$5,950	\$6,600	+\$650

Changes to other categories of building permit fees are not recommended at this time.

7.0 CONCLUSIONS

From the analysis of building permit fees undertaken, it is recommended that Council consider adding building permit fees for temporary structures, additional inspections as required, septic system reviews for changes of use, and solar panels that are not currently included in the fee structure.

At this time, there is a healthy stabilization reserve fund; however a downturn in permit revenue could significantly reduce this fund as expenditures continue to increase. Council and staff could consider increasing select fees to offset a reduction in permit revenue.

Should Council wish to add the recommended fees and/or change any existing fees, a public meeting must be held per the OBC Act. Prior to this meeting, the Municipality must provide 21 days notice and ensure a copy of the meeting notice is sent to anyone who requests it. The notice must set out the intention to change or impose fees and directs any member of the public to where they may find information on the estimated costs of administering and enforcing the OBC Act, the amount of the fee or the change to an existing fee, and the rationale for imposing or changing the fee.

All of which is respectfully submitted.

Yours very truly

B. M. ROSS AND ASSOCIATES LIMITED

Per

Lisa J. Courtney, MCIP, RPP

Senior Planner

DRAFT

APPENDIX A
MUNICIPALITY OF BROCKTON BUILDING PERMIT FEES

DRAFT

Schedule C

Property Standards

Description	Effective Date	2023 Fee	2024 Fee	2025 Fee	Increase / (decrease)	Tax Applicable?		
						No	HST (13%)	GST (5%)
Appeal a Property Standards Order to the Property Standards Committee	January 1	\$150.00	\$150.00	\$154.65	3.1%			
Appeal a Property Standards Committee decision to the Superior Court	January 1	\$250.00	\$250.00	\$257.75	3.1%			
Property Standards Officer to attend a hearing	January 1	\$50.00	\$50.00	\$51.55	3.1%			
Inspections where owner fails to comply with an Order:								
Owner(s) who failed to comply with a confirmed Order shall pay a fee for each inspection to determine if contraventions of this By-law observed on an initial inspection have been corrected where the contraventions have not been remedied in the time provided for in the said order	January 1	\$100.00	\$100.00	\$103.10	3.1%			
Certificate of Compliance	January 1	\$200.00	\$ 200.00	\$206.20	3.1%			
Initial inspection where property deficiencies or by-law violations are observed	January 1	N/A	N/A	N/A	0.0%			
Additional Costs to be collected from violating property owners include	January 1	Costs for Court Hearings and Proceedings	Costs for Court Hearings and Proceedings	Costs for Court Hearings and Proceedings	0.0%			

Building Permit - By-law 2019-147

Description	Effective Date	2023 Fee	2024 Fee	2025 Fee	Increase / (decrease)	Tax Applicable?		
						No	HST (13%)	GST (5%)
Commercial/Industrial/Institutional	January 1	\$100.00 plus \$.70/sq. ft. per floor	\$100.00 plus \$.90/sq. ft. per floor	\$100.00 plus \$.90/sq. ft. per floor	0.0%	X		
Tarp structure as for Commercial/Industrial/Institutional	January 1	\$100.00 plus \$.70/sq. ft. per floor	\$100.00 plus \$.80/sq. ft. per floor	\$100.00 plus \$.80/sq. ft. per floor	0.0%	X		

Description	Effective Date	2023 Fee	2024 Fee	2025 Fee	Increase / (decrease)	Tax Applicable?		
						No	HST (13%)	GST (5%)
Single Family Residential	January 1	\$100.00 plus \$.65/sq. ft. per floor – excluding unfinished basement	\$100.00 plus \$.80/sq. ft. per floor – excluding unfinished basement	\$100.00 plus \$.80/sq. ft. per floor – excluding unfinished basement	0.0%	X		
Multiple Family Residential	January 1	\$100.00 plus \$.70/sq. ft. per floor – excluding unfinished basement	\$100.00 plus \$.80/sq. ft. per floor – excluding unfinished basement	\$100.00 plus \$.80/sq. ft. per floor – excluding unfinished basement	0.0%	X		
Additions and Renovations, Plumbing	January 1	\$100.00 plus \$10.00/\$1000 of construction	\$100.00 plus \$15.00/\$1000 of construction	\$100.00 plus \$15.00/\$1000 of construction	0.0%	X		
Accessory Buildings	January 1	\$100.00 plus \$.25/sq. ft.	\$100.00 plus \$.30/sq. ft.	\$100.00 plus \$.30/sq. ft.	0.0%	X		
Farm Buildings, Housing Livestock including below Barn Manure Storage	January 1	\$100.00 plus \$.25/sq. ft.	\$100.00 plus \$.30/sq. ft.	\$100.00 plus \$.30/sq. ft.	0.0%	X		
Farm Buildings for purposes other than Housing Livestock	January 1	\$100.00 plus \$.20/sq. ft.	\$100.00 plus \$.25/sq. ft.	\$100.00 plus \$.25/sq. ft.	0.0%	X		
Silo's -- Tower or Bunker	January 1	18/Jul	\$300.00	\$309.30	3.1%	X		
Manure Storage Facilities	January 1	\$10.00/ft. of diameter or \$.25/sq. ft. for all others with a minimum charge of \$200.	\$15.00/ft. of diameter or \$.30/sq. ft. for all others with a minimum charge of \$200.	\$15.00/ft. of diameter or \$.30/sq. ft. for all others with a minimum charge of \$200.	0.0%	X		
Agricultural Tarped Structure	January 1	\$100.00 plus \$.10/sq. ft.; if used for animals \$.15/sq. ft.	\$100.00 plus \$.15/sq. ft.; if used for animals \$.20/sq. ft.	\$100.00 plus \$.15/sq. ft.; if used for animals \$.20/sq. ft.	0.0%	X		
Additions & Renovations of Farm Buildings	January 1	\$100.00 plus 10.00/\$1000 of construction	\$100.00 plus \$12.00/\$1,000 of construction	\$100.00 plus \$12.00/\$1,000 of construction	0.0%	X		
Granary	January 1	\$150.00	\$200.00	\$206.20	3.1%	X		
Swimming Pools	January 1	\$150.00	\$200.00	\$206.20	3.1%	X		
Chimney and/or Solid Fuel Burning Appliance Installation	January 1	\$200.00	\$250.00	\$257.75	3.1%	X		
Demolitions	January 1	\$200.00	\$250.00	\$257.75	3.1%	X		
Change of Use	January 1	\$200.00	\$250.00	\$257.75	3.1%	X		
Mobile Homes	January 1	\$100.00 plus \$.30/sq. ft.	\$100.00 plus \$.40/sq. ft.	\$100.00 plus \$.40/sq. ft.	0.0%	X		
Moving Permits	January 1	\$200.00	\$200.00	\$206.20	3.1%	X		

Description	Effective Date	2023 Fee	2024 Fee	2025 Fee	Increase / (decrease)	Tax Applicable?		
						No	HST (13%)	GST (5%)
Wind Towers	January 1	\$20/\$1000 of construction of Base and Tower	\$25/\$1000 of construction of Base and Tower	\$25/\$1000 of construction of Base and Tower	0.0%	X		
Tents	January 1	\$100.00	\$150.00	\$154.65	3.1%	X		
Septic Systems Class 2 and 3	January 1	\$200.00	\$300.00	\$309.30	3.1%	X		
Septic Systems Class 4 and 5	January 1	\$500.00	\$600.00	\$618.60	3.1%	X		
Septic System Renos/Repairs	January 1	\$300.00	\$400.00	\$412.40	3.1%	X		
Plumbing	January 1		Included in Building Permit Fee	Included in Building Permit Fee	0.0%	X		
Transfer of Permit	January 1	\$200.00	\$200.00	\$206.20	3.1%	X		
Signs per OBC	January 1	\$100.00 plus \$15.00/\$1,000 of construction	\$100.00 plus \$20.00/\$1,000 of construction	\$100.00 plus \$20.00/\$1,000 of construction	0.0%	X		

*Building Started WITHOUT a Permit, double original permit fee price

By-Law Enforcement

Description	Effective Date	2023 Fee	2024 Fee	2025 Fee	Increase / (decrease)	Tax Applicable?		
						No	HST (13%)	GST (5%)
At Fault False Alarms								
First At Fault False Alarm	January 1	\$50.00	\$50.00	\$51.55	3.1%	X		
Second At Fault False Alarm	January 1	\$100.00	\$100.00	\$103.10	3.1%	X		
Third At False Alarm	January 1	\$200.00	\$200.00	\$206.20	3.1%	X		
For fourth and subsequent At Fault False Alarms increased by:	January 1	\$100 per incident	\$100 per incident	\$100 per incident	0.0%	X		
Signs Permit per Sign By-Law	January 1	\$100.00	\$100.00	\$103.10	3.1%	X		
Swimming Pools Enclosure Permits	January 1	\$150.00	\$150.00	\$154.65	3.1%	X		

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APPENDIX B
COMPARISON OF BUILDING PERMIT FEES

Building Permit Fees

Category	Brockton	Hanover	West Grey	Chatsworth	Minto	South Bruce	Saugeen Shores	Arran Elderslie	Kincardine	HK	SBP	NBP
Commercial/ Industrial/ Institutional	100 + \$.90/sqft	\$12/\$1000 construction	\$12/1000 construction	\$12/\$1000 construction	300+\$.8/sqft	150+\$.85/sqft	\$1.14/sqft	\$0.8/sqft	\$0.8/sqft	\$0.85/sqft	\$1.40/sqft	\$13/\$1000 construction
Tarp Structure	100 + \$.80/sqft											
Single Family	100 + \$.80/sqft	\$8.00/\$1000 construction	0.75/sqft (250 min)	0.6/sqft	300+\$.150/sqft	150+\$.85/sqft	\$0.87/sqft	\$1.55/sqft	\$0.8/sqft	\$0.85/sqft	\$1.35/sqft	\$1.15/sqft
Multi Unit	100 + \$.80/sqft	\$8.00/\$1000 construction	0.75/sqft (250 min)	0.6/sqft	300+\$.150/sqft	150+\$.85/sqft	\$0.87/sqft	\$1.40/sqft	\$0.8/sqft	\$0.85/sqft	\$1.35/sqft	\$1.15/sqft
Additions/ Renos/ Plumbing	100 + \$15/\$1000 construction	\$8.00/\$1000 construction	0.75/sqft (250 min)	\$15/\$1000 value	300+\$.8/sqft	150+\$.11/\$1000 construction	\$0.87/sqft	\$1.55/sqft	100+\$.10.50/\$1000 construction	\$11/\$1000 construction	\$1.35/sqft	\$1.15/sqft
Accessory Buildings	100 + \$.30/sqft		0.50/sqft	0.6/sqft	300+\$.06/sqft	150+\$.04/sqft	\$0.56/sqft	\$0.75/sqft	\$0.40/sqft	\$0.50/sqft	\$0.80/sqft	
Farm Building - with livestock	100 + \$.30/sqft		\$0.35/sqft (less than 10,000), \$0.15/sqft (above 10,000)	0.4/sqft	300+\$.035/sqft	150+\$.030/sqft	\$0.35/sqft	\$0.35/sqft	\$0.35/sqft	\$0.35/sqft	\$0.25/sqft	\$0.25/sqft
Farm Building other than livestock	100 + \$.25/sqft					150+\$.030/sqft	\$0.30/sqft	\$0.30/sqft	\$0.30/sqft	\$0.30/sqft	\$0.25/sqft	\$0.20/sqft
Silo	309.3			300	450	200	254.59	150		300	\$0.25/sqft	300

Category	Brockton	Hanover	West Grey	Chatsworth	Minto	South Bruce	Saugeen Shores	Arran Elderslie	Kincardine	HK	SBP	NBP
Manure Storage	15/ft of diameter or 0.30/sqft (min 200)				\$6.00/linear sqft	150+\$0.2/sqft or \$10/linear foot in diameter	445.54	\$0.30/sqft		\$0.25/sqft	\$0.25/sqft	
Agricultural Coverall	100 + \$0.15/sqft (if used for animals .20/sqft)					150+\$0.3/sqft	254.59	\$0.35/sqft				
Additions/ Renos Farm	100 + \$12/\$1000 construction					150+\$11/value of construction		\$0.30/sqft	100+\$10.5/\$1000 construction			
Granary	206.2					200	254.59	150		300		300
Swimming Pool	206.2		250	250	150	150	171.85	150-350	100	200		200
Chimney/ Wood Stove	257.75	100	250	175	300	175	171.85	150	100		100	200
Demo	257.75	60-350	250	200	150	150	171.85	130	100	200	125	125
Change of Use	257.75	10/1000 construction	250	300	300	150	127.3	130	112	200	150	150
Mobile Home	100 + \$0.40/sqft			250								
Moving Permit	206.2	100				150		210	100			150
Wind Tower	\$25/\$1000 construction		35000	6600+5100		150+\$15/\$1000 value		100000	\$26.00/\$1000 construction	\$26.00/\$1000 construction		
Tent	\$154.65	60	150	100	150	150	99.84	150	100	200	75	150
Septic 2-3	309.3	50	600	300		350	731.96	350	605	750	250	550

Category	Brockton	Hanover	West Grey	Chatsworth	Minto	South Bruce	Saugeen Shores	Arran Elderslie	Kincardine	HK	SBP	NBP
Septic 4-5	618.6	350	600	700	600	500	731.96	600	605	750	500	550
Septic Repairs	412.4	100 +\$25/\$1000 cost	250	300-525	150-450	400	381.89	350	350	400	200	300
Plumbing	in building permit fee	100 +\$8/fixture			150							
Transfer permit	206.2	250		200		150	101.84		112	125		
Sign	100 + \$20/\$1000 construction	\$10/\$1000 construction					107	10/1000 construction	26.00/1000	200		25
Residential occupancy		2.25/sqft										
Renew (residential)		\$8.00/\$1000 construction	100							50		150
Conditional		Same as final	500									
Patio		200										
Mobile Sign		\$21/month										
Investigation fee		150										
Inspection only		75			150			130	100	100		
Reinspection fee		75	100	125	150							
Compliance Letter			150	175			111.45					100
Revision			150	200			107.95					
Deck			0.75/sqft	0.5/sqft	300+0.6/sqft	150+.4/sqft		0.80/sqft (min 125)				0.8/sqft
Septic Review			150	200		100	268.32		235	200	100	200

Category	Brockton	Hanover	West Grey	Chatsworth	Minto	South Bruce	Saugeen Shores	Arran Elderslie	Kincardine	HK	SBP	NBP
Septic Compliance			150	125								
Accessory Apartments					300 + 0.8/sqft							
Temp. Structure					300					200		
Solar					300	150+15/ 1000 value						200
Greenhouses									4.10/1000 construction			

Calculated Building Permit Fees

Category	Brockton	Hanover	West Grey	Chatsworth	Minto	South Bruce	Saugeen Shores	Arran Elderslie	Kincardine	HK	SBP	NBP
Commercial/Industrial/Institutional	5950	9000	9000	9000	5500	5675	7410	5200	5200	5525	9100	9750
Tarp Structure	5300											
Single Family	1060	3600	900	720	2100	1170	1044	1860	960	1020	1620	1380
Multi Unit	1700	3600	1500	1200	3300	1850	1044	2800	960	1700	2700	2300
Additions/Renos/Plumbing	1000	480	750	900	1100	810	870	1550	730	660	1350	600
Accessory Buildings	220		200	240	540	310	224	300	160	200	320	
Farm Building - with livestock	2260		2520	2880	2820	2310	2520	2520	2520	2520	1800	1800
Farm Building other than livestock	1900		2520	2880	2820	2310	2160	2160	2160	2160	1800	1440
Silo	309.3			300	450	200	254.59	150		300		300
Manure Storage	1500				600	1000	445.54	30	2160	1800		
Agricultural Coverall	1180					2310	254.59	2520	2160			
Additions/Renos Farm	820					810			730			
Granary	206.2					200	254.59	150		300		300
Swimming Pool	206.2		250	250	150	150	171.85	350	100	200		200
Chimney/Wood Stove	257.75	100	250	175	300	175	171.85	150	100		100	200
Demo	257.75		250	200	150	150	171.85	130	100	200	125	125



MUNICIPALITY OF BROCKTON PLANNING FEES REVIEW



DRAFT



MUNICIPALITY OF BROCKTON
PLANNING FEES REVIEW

DRAFT

August 18, 2025

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File No. 25052

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MUNICIPALITY OF BROCKTON

PLANNING FEES REVIEW

1.0 INTRODUCTION

1.1 Introduction

The intent of this report is to summarize the review and analysis undertaken to examine current planning and development fees in the Municipality of Brockton. Staff asked B. M. Ross and Associates Limited (BMROSS) to conduct a review of the planning fees and the planning department reserve fund to provide recommendations on updated fee structures. The work completed as part of this study also includes an assessment of planning fees of other municipalities in Bruce County and adjacent to Brockton. This review included the following activities:

- Review of background materials, including planning application information and the legislative requirements under the *Planning Act*.
- A meeting with staff to review fees, direct and indirect costs, issues and concerns with the current fee structure.
- Forecasting future expenses and assessing potential revenue levels.
- Assessing future expenses in relation to future balances within the reserve fund, and
- Identifying recommendations for new fees based on the analyses undertaken.

2.0 LEGISLATIVE REQUIREMENTS

The ability to charge and collect fees associated with planning related activities is provided through Section 69 of the *Planning Act*. This section allows municipalities, through a by-law, to collect fees for the processing applications related to planning matters. The Act specifies that fees should be designed to recover anticipated costs to the municipality with respect to each type of application in the fee schedule. The Act does not specifically specify or define what costs are eligible or ineligible when considering

recoverable costs. Given this, direct costs related to the provision of the service as well as indirect costs (general corporate overhead) should be considered when evaluating the fees.

Once the fees are established, the municipality can waive or reduce the payment of fees. The amount or levying of a fee in respect to a planning application can be appealed to the Ontario Land Tribunal (OLT) by any person required to pay the fee. The fee must be paid under protest and a written appeal provided to the OLT within 30 days of paying the fees. The Tribunal can dismiss the appeal or direct a refund in the amount determined by the Tribunal.

The *Municipal Act, 2001* provides the authority for municipalities to impose fees and charges, under Section 391(1) Part XII. This section allows municipalities to impose fees or charges for services provided by or on behalf of the municipality, for costs payable for services or activities provided by or done on behalf of any other municipality or local board, and for the use of municipal property or property under its control. The *Municipal Act* does not set out specific requirements for the establishment of fees for municipal services. There is also no mechanism to appeal fees or charges to the OLT. Fees established under the Municipal Act are not subject to a public process or specific term requirements; however, there is a requirement for transparency when fees and charges are imposed.

3.0 PLANNING ACTIVITY, REVENUES AND EXPENDITURES

3.1 Historical Planning Activity

In Brockton, the County of Bruce is the approval authority and carries out certain planning activities on behalf of the Municipality. This includes severances, minor variances, draft plan approval for plans of subdivision and condominium, official plan amendments and zoning bylaw amendments. The Brockton Planning Department is responsible for administering the site plan approval process and the zoning by-law. Brockton staff are also involved in the review of other planning applications administered by the County. Municipal staff are responsible for the managing the upcoming updates to the Official Plan and Zoning Bylaw.

Brockton staff provided planning application information from 2015 to 2025. The data provided summarized the annual number of applications for minor variances, consents, zoning amendments, local official plan amendments, county official plan amendments, plans of subdivision and plans of condominium. Information on the number of site plan applications was derived from staff and a review of BMROSS files. The number of files for each type of application is summarized in Table 3.1.

Table 3.1 No. of Planning Application Files Per Year (2015-2024)

File Type / Year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Minor Variance	3	5	2	6	7	8	14	7	2	3	57
Consent	7	14	14	9	15	8	14	14	11	15	123
Zoning	6	10	16	13	14	8	14	17	10	5	114
Local OPA	2	1	1	0	1	1	1	0	1	1	9
County OPA	0	2	4	2	3	1	3	2	1	2	20
Plan of Subdivision /Condo	1	0	1	1	0	0	1	1	1	1	7
Site Plan					1	0	7	8	6	3	27
Total	19	32	38	31	41	26	54	49	32	30	357

The number of planning applications received per year is variable. An increase in the total number of applications occurred between 2021 and 2022. This was driven primarily by an increase in the number of site plan applications. The majority of permits received are for consents (severances) and zoning bylaw amendments. The number of plans of subdivision or condominium have historically been consistent at one application per year. The number of site plan applications, which fall under the responsibility of the Brockton planning department, have varied annually, with a greater number submitted during and immediately following the COVID-19 pandemic (2021-2023).

3.2 Revenues

Annual revenues for the Planning Department are summarized in Table 3.2. Sources of revenue are fees from site plan applications and zoning compliance certificates. Fees for official plan and zoning bylaw amendments, consents and minor variances are charged and collected by the County of Bruce, and therefor are not reported here.

Table 3.2 Planning Department Revenue (2016-2024)

Year	Total Revenue
2016	400.00
2017	-
2018	-
2019	-
2020	-
2021	2,396.30
2022	7,498.60
2023	20,784.50
2024	17,595.60
2025	2,006.00

For 2023 and 2024, the total revenue is split almost evenly between fees from site plan agreements and zoning compliance certificates. The revenue for prior years is from site plan fees. There may be other planning department revenue from other fees that has been received; however, at this time, those funds have not been accounted for as revenue for the planning department.

3.3 Expenditures

Staff provided a breakdown of expenditures related to planning activities from 2016 to 2024. Expenditures include direct costs related to the provision of planning services, such as wages, benefits, milage, etc., as well as indirect costs such as insurance, vehicle maintenance and other costs related to general overhead. The total planning department expenses on an annual basis are summarized in Table 3.3.

Table 3.3 Planning Department Expenditures (2016-2024)

Year	Total Expenses
2016	18,552.78
2017	20,902.44
2018	19,534.39
2019	44,331.77
2020	26,465.79
2021	18,954.38
2022	123,109.14
2023	88,977.05
2024	147,234.92

Expenses under the planning budget have varied annually and are primarily driven by wages, benefits and service agreements. Service agreement expenses are generally costs associated with consultants retained for assistance on specific projects (e.g. review of the County Official Plan process and submission of the Minister’s Zoning Order). The significant increase in expenses in 2022 and carried through in subsequent years is attributable to expenses under service agreements and an increase in the wages (and associated benefits). This reflects wage increases and adjustments, as well as additional staff time attributed to planning files. In 2022, the expenditures included costs associated with retaining a consultant for the County Official Plan review and moneys budgeted for the upcoming Official Plan and Zoning Bylaw review.

3.4 Planning Reserve Fund

A planning reserve fund has been established to provide revenue stabilization as well as for the budgeting of larger planning related expenses (e.g. consultant services for the official plan and zoning by-law review process). The reserve fund balances and transfers in and out of the reserve from 2017 to 2024 are summarized in Table 3.4.

Table 3.4 Planning Department Reserve Fund (2017-2024)

Year	Reserve Starting Balance (\$)	Transfer In (\$)	Transfer Out (\$)	Reserve End Balance (\$)
2017	18,859.43	93.52	0.00	18,952.95
2018	18,952.95	273.81	0.00	19,226.76
2019	19,226.76	645.31	304.00	19,568.07
2020	19,568.07	118.40	0.00	19,773.10
2021	19,773.10	180.09	61.69	19,891.50
2022	19,891.50	25,385.92	0.00	45,277.42
2023	45,277.42	1,611.48	0.00	46,888.90
2024	46,888.90	63,018.18	638.56	109,268.52

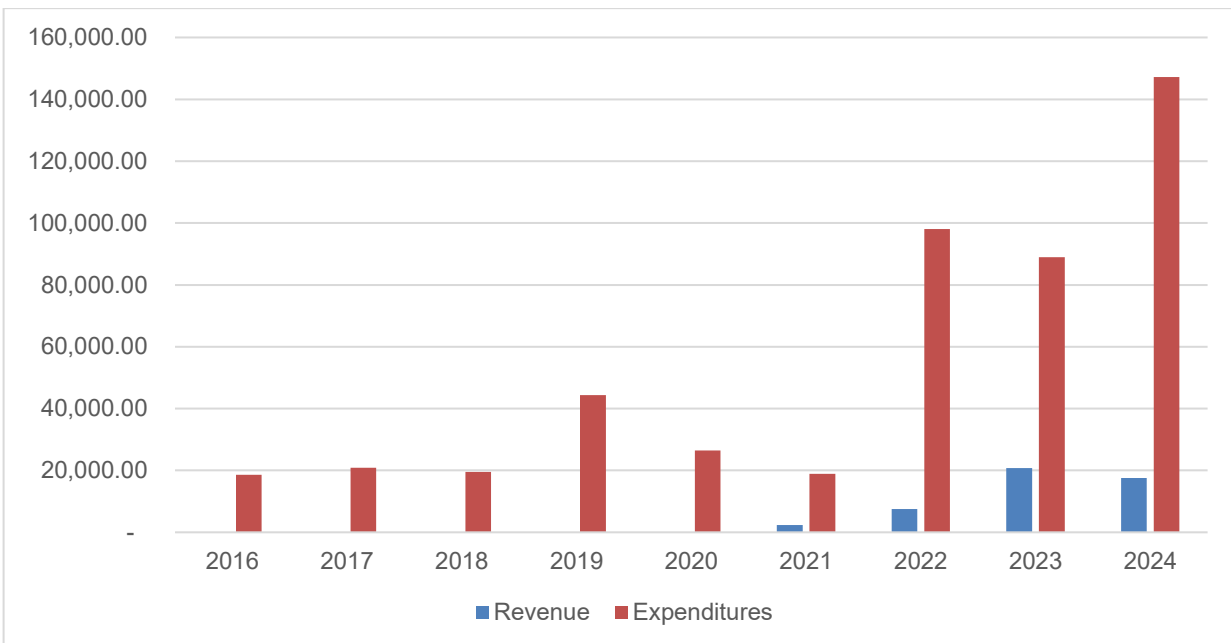
Prior to 2022, transfers into the reserve were limited to interest payments. Starting in 2022, the Municipality transferred monies into the reserve following the budget process for the upcoming zoning bylaw and official plan review. In 2022, an initial \$25,000 was transferred, followed by \$60,000 in 2024. There have been no transfers into the reserve as a result of revenue in excess of expenses. The current balance of the reserve is \$109,268. From discussions with staff, future expenses that may be paid for using reserve funds include the replacement of the two building and planning department vehicles and the remainder of costs associated with the zoning and official plan update process.

4.0 EVALUATION OF PLANNING FEES

4.1 Cost Recovery Analysis

To evaluate the cost recovery of the current planning fees, the annual revenue was compared against the annual expenditures attributed to the planning department. Figure 4.1 shows the annual revenues and expenditures from 2016 to 2024. It should be noted that there was no revenue reported between 2016 and 2020. This may be the result of previous revenue reporting and accounting practices, with revenue reported elsewhere within the Municipality's accounting system.

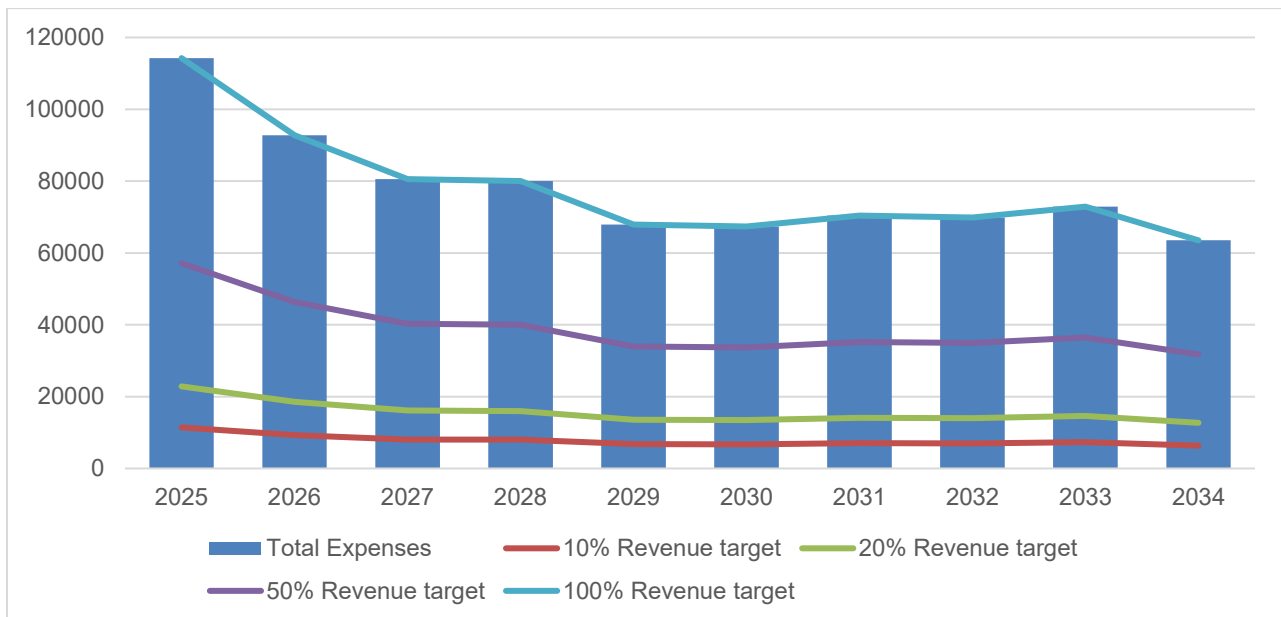
Figure 4.1 Planning Revenue and Expenditures (2016-2024)



For the period from 2021 and 2024, cost recovery of planning expenditures has varied between 8% and 23%, with the greatest cost recovery occurring in 2023. The average cost recovery over the last 4 years has averaged 12% of expenditures. On annual basis between 2016 and 2024, the average difference between expenditures and revenues is approximately \$50,000. The increased expenditures categorized as service agreements in 2022 to 2024 are the most significant factor impacting cost recovery. If the service agreement expenditures are netted out of the expenses, the percentage of annual average cost recovery increases to 23%.

To assess future cost recovery, expenditures were forecasted 10 years into the future. Revenue targets for 10%, 20%, 50% and 100% cost recovery were then calculated. For future budgets, it was assumed staff wages and benefits would increase annually with a 2% cost of living adjustment. Insurance expenses have historically increased annually, and this is expected to continue at a rate of 5% annually over the next 10 years. The amount budgeted for service agreements is forecasted to decrease over the next 10 years, following the completion of the Official Plan and Zoning Bylaw update and the County's Official Plan update process. The forecasted total expenditures per year and required revenue to achieve 10%, 20%, 50% and 100% cost recovery are shown in Figure 4.2.

Figure 4.2 Forecasted Expenditures and Revenue Based on Cost Recovery Targets



Over the forecast period, it is expected that expenditures will decrease from approximately \$110,000 in 2025 to \$63,000 in 2034. The decrease in expenditures is primarily driven by a forecasted decrease in the service agreements, as major planning projects are completed. Expenditures are believed to decrease to levels more aligned with amounts spent between 2022 and 2024 without the service agreement expenses. It is expected staff time on planning files will remain similar to recent levels, as staff have indicated planning files tend to be more complicated and complex than in the past.

For the purposes of assessing required revenue, four scenarios were modelled based on 10%, 20%, 50% and 100% cost recovery. Presently, the average revenue received per site plan application is \$1,555. The other source of revenue, zoning compliance certificates, account for an average of 47% of annual revenues with a yearly average of 87 certificates. These values were used to determine a target number of site plans and zoning certificates to achieve the desired percentage of cost recovery. Figure 4.3 shows the number of site plan applications required to achieve the revenue recovery amounts for each target scenarios on an annual basis. Figure 4.4 shows the number of zoning compliance certificates required to meet the revenue levels associated with the target scenarios. These scenarios are based on the current planning fee structures.

Figure 4.3 Number of Site Plan Applications Required to Achieve Target Revenue

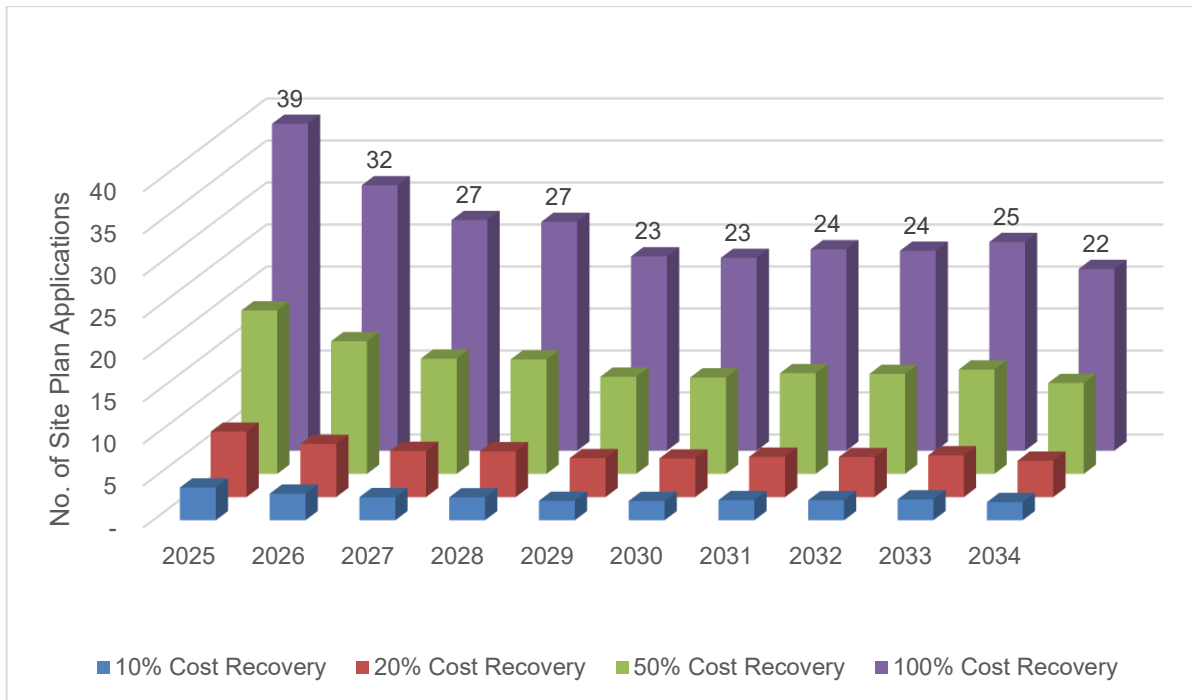
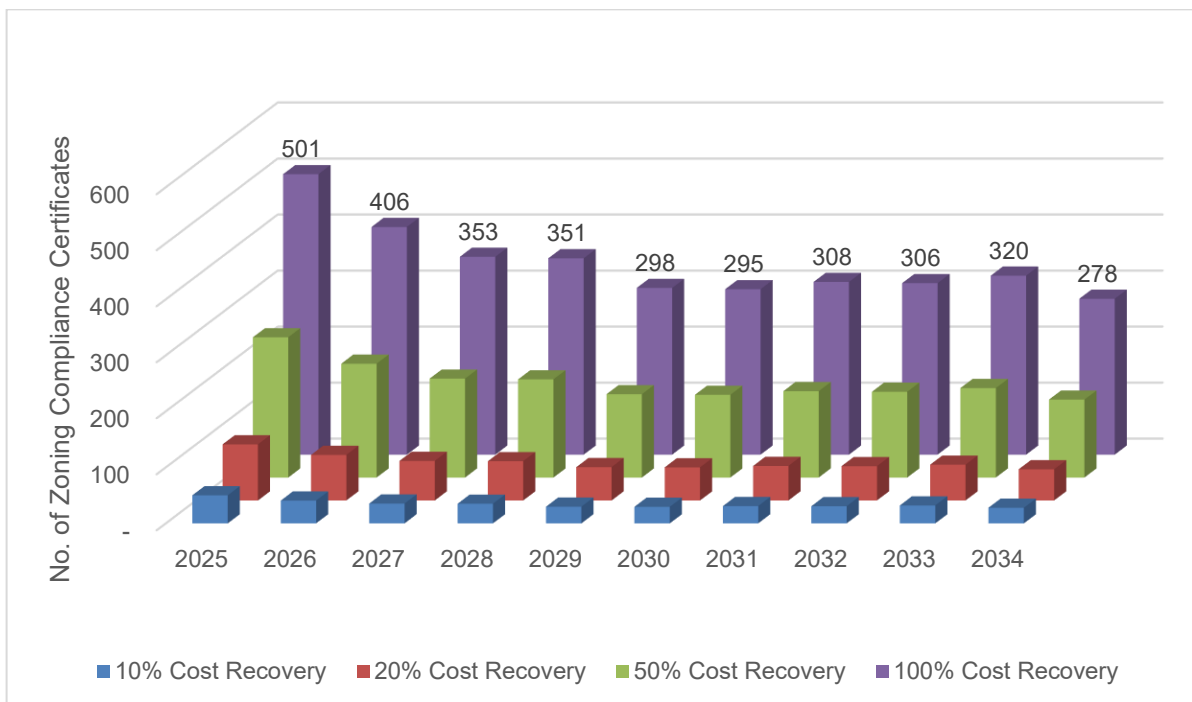


Figure 4.4 Number of Zoning Compliance Certificates Required to Achieve Target Revenue



For the lowest cost recovery scenario (10% cost recovery), an annual average of 2 to 3 site plans is required with an average of 34 zoning compliance certificates. This scenario approximates the current level of cost recovery. Under this scenario, planning department revenue is approximately \$8,000 per year. To achieve 20% cost recovery, the target number of site plans is an average of 5 per year with an average of 68 zoning compliance certificates per year. For 50% cost recovery, between 10-15 site plan applications per year are required, with average of 170 zoning compliance certificates per year. To achieve full cost recovery, 20 to 30 site plans per year are required with over 240 zoning compliance certificates annually.

It is unlikely that the number of site plans and zoning compliance certificates will increase to a level to achieve 50% or 100% cost recovery under the current planning fees. Given this, it is recommended that consideration be given to increasing planning fees to achieve a greater level of cost recovery.

4.2 Current Planning Fees

The current planning and development fees are set through By-law 2024-070, passed in September 2024. Table 4.1 summarizes the current fee schedule, as well as the 2024 fees under 'Planning and Development'. Fees related to site plans, plans of subdivision and plans of condominium are based on a fee per number of proposed units or blocks. Most of the other fees are based on actual time or are charged at a flat rate. The planning and development fees were last updated in 2024 (for 2025), with the addition of new fees for major and minor site plan revisions. The majority of fees were unchanged from 2024 to 2025, with the other increases varying between 3% and 5%.

Table 4.1 Current Brockton Planning Fee Schedule

Fee Schedule	2024	2025
Certificate of Zoning Compliance	104	107.25
Site Plan Agreement Admin Fee	0.10/sqft (min. 500)	0.10/sqft + 114
Site Plan Review Fee	114+actual cost	500 + billed for actual
Site Plan Agreement Deposit - Compliance	Min. 3,000 max. 20,000 (based on 1% of construction value)	Min. 3,000 max. 20,000 (based on 1% of construction value)
Minor Redline Revision	-	3,000
Major Redline Revision	-	5,000
Deeming Bylaw - Admin Fee	250	257
Deeming Bylaw Registration	1,000	1,000
Encroachment or Servicing Agreement Admin Fee	250	257
Encroachment or Servicing Agreement Registration	1,000 deposit, billed for actual	1,000 deposit, billed for actual
Preconsultation (Subdivision)	350	360.75
Plan of Subdivision Admin Fee	150 per block/lot	150 per block/lot
Plan of Subdivision Review/Agreement	2,000 deposit, billed for actual	2000 deposit, billed for actual
Final Approval of Subdivision/Phase of Being Registered	1,000	1,050
Draft Plan of Subdivision Approval Extension	500 (1st request), 800 (2nd request), 1,000 (3rd request)	500 (1st request), 800 (2nd request), 1,000 (3rd request)
Draft Plan of Subdivision Revival	150 per block/lot (min 3,000 max 9,000) + 1,000	150 per block/lot (min 3,000 max 9,000) + 1,000
Draft Plan of Condominium Admin Fee	50 per unit (min 500)	50 per unit (min 500)
Draft Plan of Condominium Review/Agreement	2000 deposit, billed for actual	2000 deposit, billed for actual
Condominium Exemption or Clearance Request	100	105
Fee payable for services by Municipal Solicitor	actual	actual

Fee Schedule	2024	2025
Fee payable for services by Municipal Engineer	actual +10%	actual +10%
Appeal to Ontario Land Tribunal	5,000 deposit, billed for actual	5,000 deposit, billed for actual
Release of Development Agreement	300 + actual registration costs	300 + actual registration costs
Request for Confirmation of Adequate Security and Releases	75	75
Parking Facilities Exemption	1,000	1,050
Official Plan or Secondary Plan Amendment	Charged by Bruce County	Charged by Bruce County
Zoning Bylaw Amendment	Charged by Bruce County	Charged by Bruce County
Application for Minor Variance	Charged by Bruce County	Charged by Bruce County
Removal of Holding Provision	150	155
Letter of Compliance (Site Plan or Subdivision)	150	155
Consent/Severance, Easements, Right of Ways	120	125
Parkland Dedication	Land conveyance of 2% for commercial/industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion	Land conveyance of 2% for commercial/industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion

4.3 Comparison to Other Planning Fees

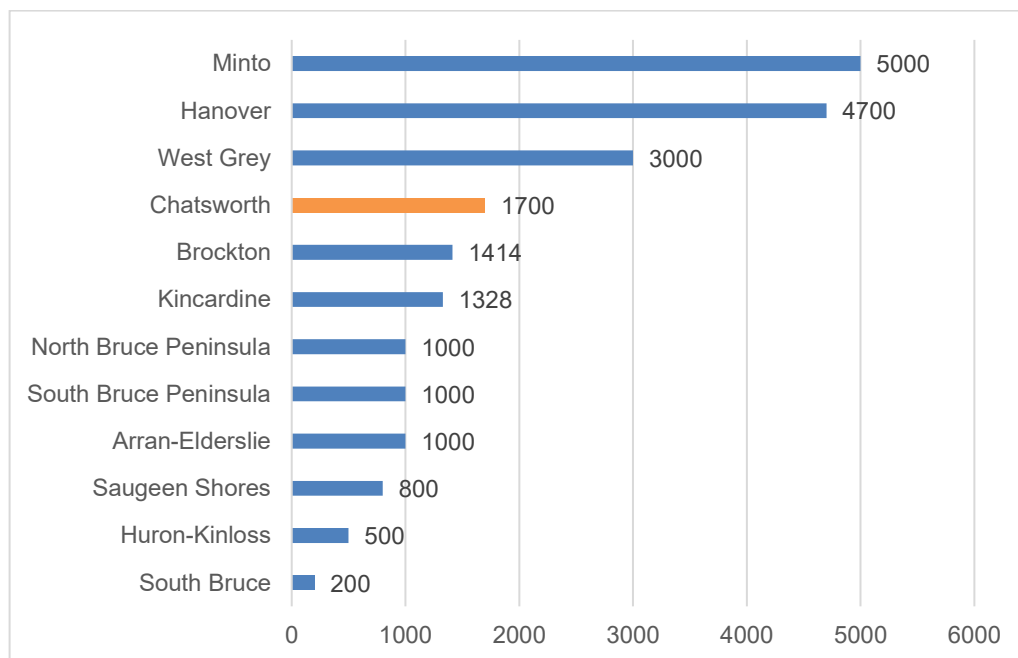
Planning fees vary between municipalities, as each municipality sets their own fees. A comparison of planning fees was undertaken to gain an understanding of the fees within other municipalities within Bruce County and those within close proximity to Brockton. This exercise will help provide a framework for any proposed fee adjustments and to establish local market conditions for planning fees.

To compare fees, the following scenarios were utilized:

- Site plan application with 14 units, 8,000 square feet in size.
- Plan of subdivision for 50 lots.
- Plan of condominium for 25 units.

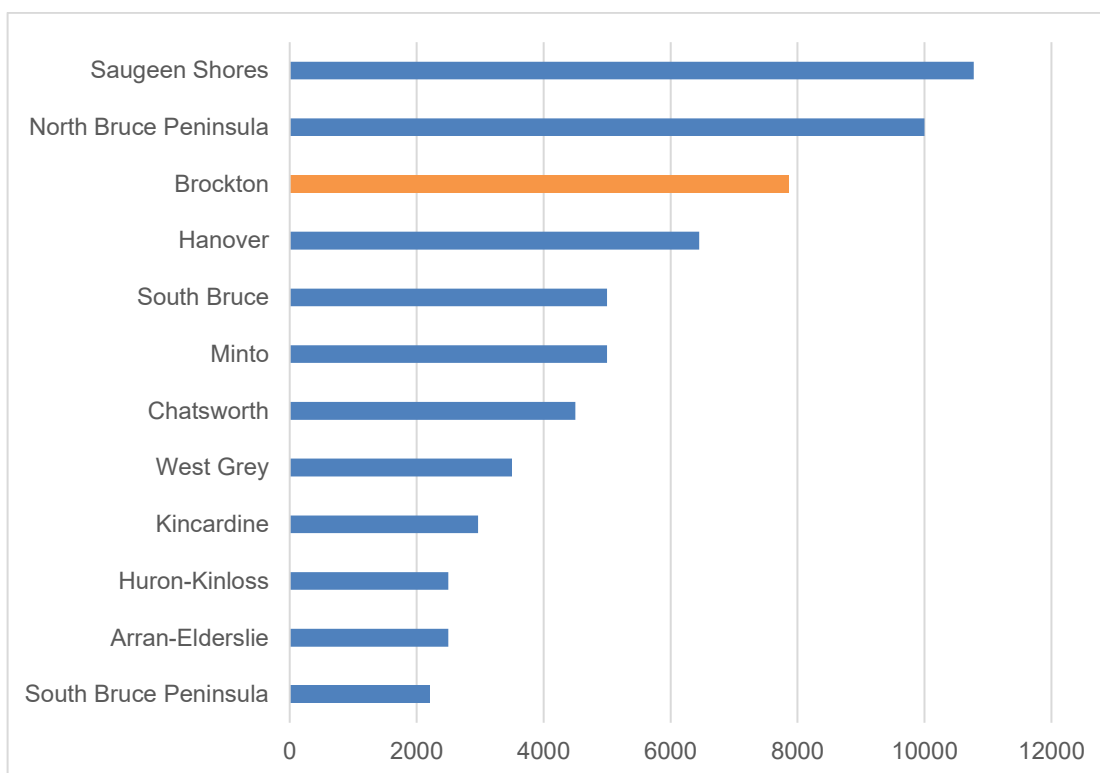
The fees for a site plan with 14 units, with a total of 8,000 square feet, in the different municipalities in Bruce County and adjacent to Brockton are shown in Figure 4.5. Note, the fees shown in Figure 4.5. include only administration fees and not refundable deposits for review of site plans. The majority of other municipalities utilize a flat rate structure for site plans, with the exception of Brockton, Hanover and Saugeen Shores. Hanover utilizes a rate per unit, while Saugeen Shores and Brockton use a per square foot rate. Generally, fees for site plans are lower in Bruce County than in neighbouring municipalities in Grey and Wellington County. Minto and Hanover have the highest site plan fees in the local area, with fees at \$5,000 and \$4,700 respectively. Fees in Bruce County range from \$200 in South Bruce to \$1,414 in Brockton.

Figure 4.5 Local Site Plan Fees



The fees associated with a plan of subdivision (assuming 50 lots), are summarized in Figure 4.6. Fees shown include pre-consultation fees, if applicable, but exclude refundable deposits and final approval fees. Similar to the site plan fees, the fees for a plan of subdivision vary across municipalities, with most charging a flat rate for a submission. Saugeen Shores, Kincardine and Brockton are the only municipalities that charge based on the number of blocks or units proposed. Generally, fees for plans of subdivision are higher in the municipalities in Grey and Wellington County than those in Bruce County. It should be noted that the fee in North Bruce Peninsula is a 10,000 security deposit as their current fee bylaw does not list any other plan of subdivision fees.

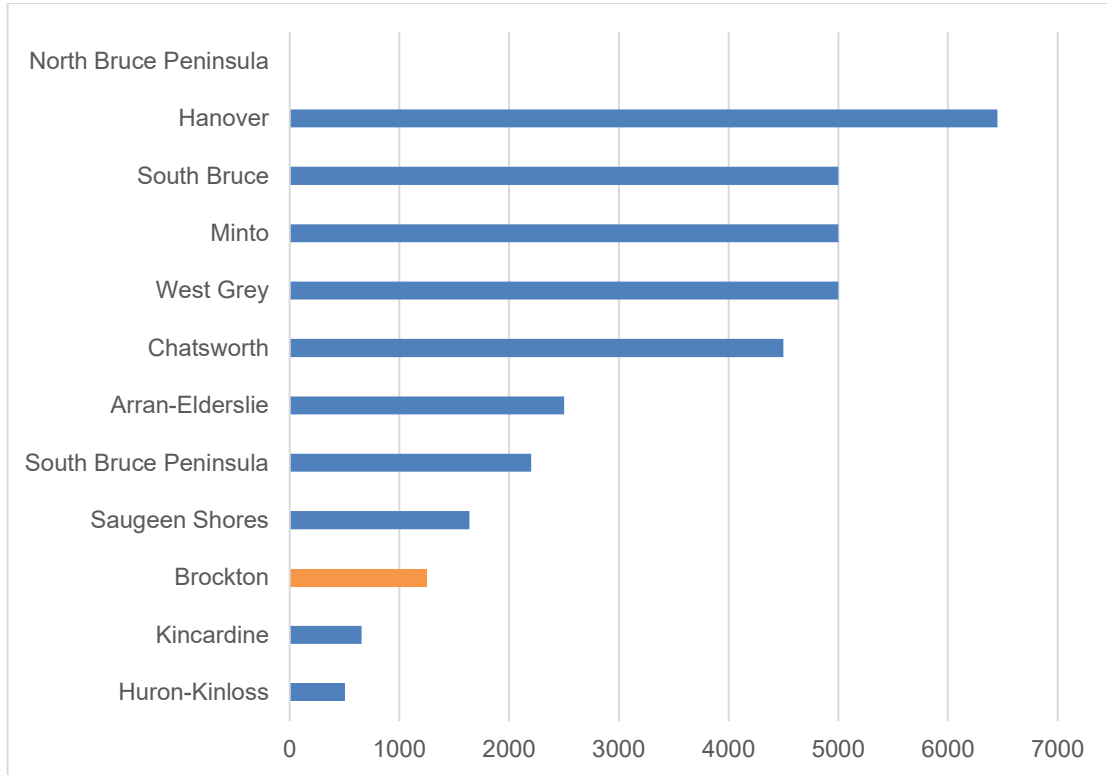
Figure 4.6 Local Plan of Subdivision Fees



Fees in Brockton are the second highest in Bruce County, only lower than Saugeen Shores. The average fee for a plan of subdivision across the referenced municipalities is approximately 5,200. Outside of Saugeen Shores and Brockton, the other municipalities in Bruce County have plan of subdivision fees between \$2,000 and \$3,000. Six of the municipalities, including two other municipalities in Bruce County, have pre-consultation fees for plans of subdivision; these fees range from \$200 to \$500. The pre-consultation fee for Brockton is \$360.75.

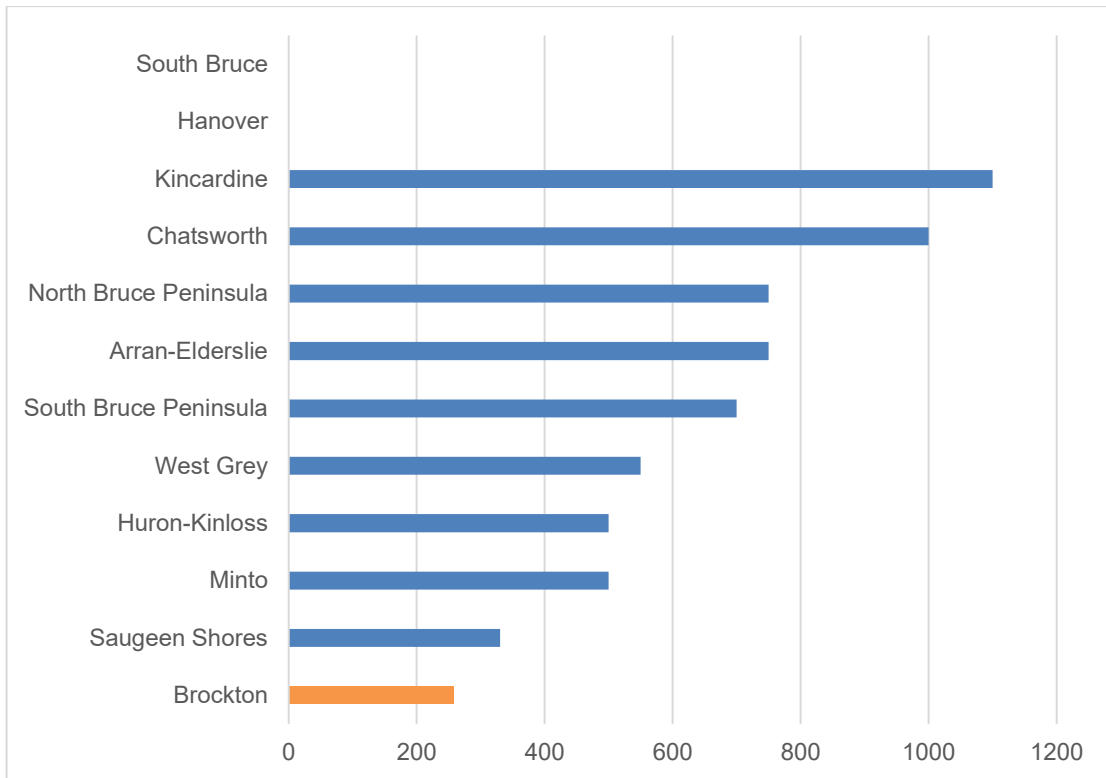
The plan of condominium fees reviewed (see Figure 4.7), like plan of subdivision fees, include flat fees and charges per unit. Brockton and Saugeen Shores charge fees based on the number of units proposed. Similar to the fees for site plans, fees are generally higher in the municipalities outside of Bruce County. Within Bruce County, the fees vary from \$500 in Huron-Kinloss to \$2,500 in Arran-Elderslie.

Figure 4.7 Local Plan of Condominium Fees



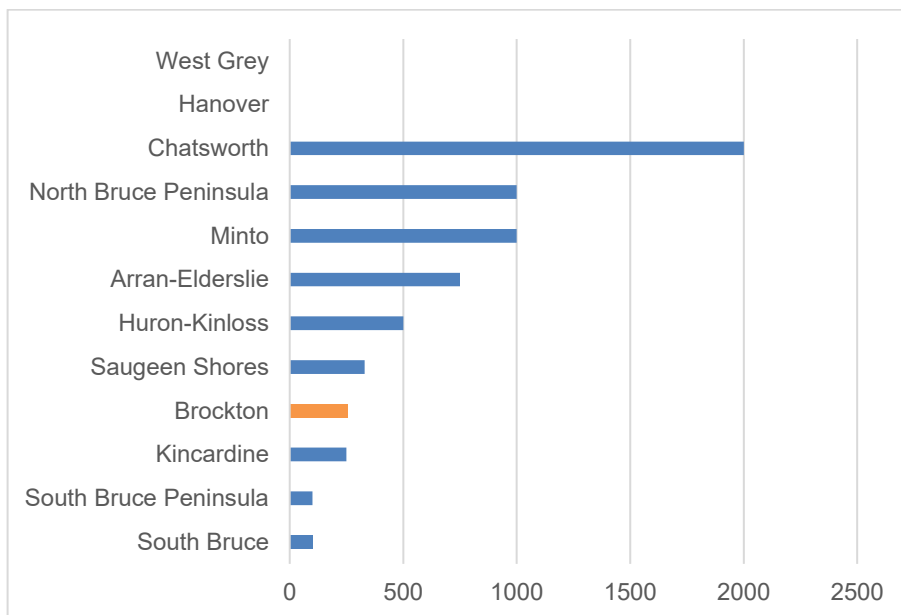
The fees for deeming by-law applications are shown in Figure 4.8. The current fee in Brockton is \$275, which is the lowest fee compared to the other municipalities reviewed. The fees range from \$1,100 in Kincardine to \$330 in Saugeen Shores. The fee by-laws for Hanover and South Bruce did not include deeming by-law applications.

Figure 4.8 Local Deeming Bylaw Application Fees



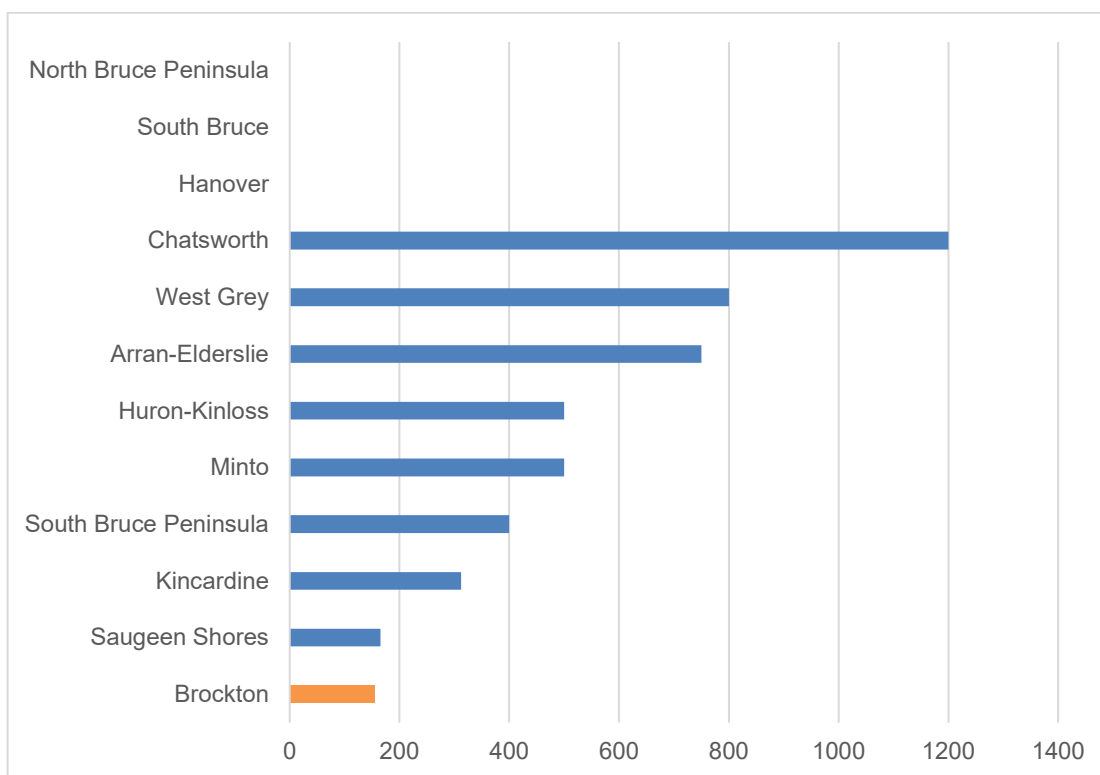
Encroachment application fees were also reviewed and compared across adjacent municipalities (Figure 4.9). Fees vary from \$100 in South Bruce Peninsula and South Bruce to \$2,000 in Chatsworth. The average fee is \$628, which is more than the current fee in Brockton (\$257).

Figure 4.9 Local Encroachment Application Fees



Municipalities also collect fees for applications or by-laws to remove a holding provision from the zoning for a property. The fees for removing a holding provision are summarized in Figure 4.10. Similar to many of the other planning fees, the fees in Bruce County are generally lower than in the neighbouring municipalities in Grey and Wellington County. The fees for removing a holding provision range from a low of \$155 in Brockton to \$1,200 in Chatsworth. The average fee is \$513 across the municipalities reviewed.

Figure 4.10 Holding Removal By-law Fees



4.4 Alternative Fee Structures

The cost recovery analysis (Section 4.1) identified that the current cost recovery level for planning fees is approximately 12%. The number of planning applications is not expected to increase significantly in the future and as such, to maintain or increase current cost recovery amounts based on the forecasted expenditure levels, additional revenue through increased fees is required.

Alternative fee structures for site plans, plans of subdivision and plans of condominium were developed and evaluated against revenue targets (10%, 20%, 50% and 100% cost recovery). A flat fee structure for site plans, plans of subdivision and plans of condominium was also developed. The alternative fee structures were also compared against the fees of adjacent municipalities to ensure the fees were within local market values. Changes to other planning fees (e.g. holding bylaws, encroachment permits) are included in the alternative fee structures but were not evaluated for their impacts on total revenue as there was not sufficient data available to determine potential revenue levels.

The alternative fee structures are summarized with the current fees in Table 5.1. The projected revenue recovery for the increases in fees are summarized in the last row of Table 5.1. Fee changes from current fees are shown by the shaded cells. Cost recovery rates vary from between 10-20% for the 10% increase in fees and 30% to 40% for flat rate and 100% increase in fee structures.

Increases are recommended for the fees for deeming bylaw applications, encroachment servicing fees, zoning certificates, removal of holding provisions, and consents/severances, easements or right of ways are recommended. These are recommended given the low current cost recovery rate. The increased fees for these planning items are still comparable to the fees in adjacent municipalities.

To achieve full cost recovery, the fees for site plans, plans of subdivision and plans of condominium will require a significant increase. This increase is between 450% and 500% of the current fees. For example, the site plan fee would need to increase to an average of \$8,000 per site plan. which is \$3,000 more than the current highest fees in adjacent neighbouring municipalities. At this time, fees set to 100% recovery are not considered feasible within the local market rates as they may negatively impact the number of development proposals in Brockton.

A comparison of the proposed alternative fees for site plans, plans of subdivision and plan of condominium are shown in Figures 4.11, 4.12. and 4.13.

Table 4.2 Alternative Planning Fee Structures

Fee Schedule	Current (2025)	Flat Fee	Increase (Flat Fee)	10% Increase in Fees	20% Increase in Fees	50% Increase in Fees	100% Increase in Fees
Certificate of Zoning Compliance	107.25	125	17%	117.98	128.70	160.88	321.76
Site Plan Agreement Admin Fee	0.10/sqft + 114	2500	change to flat rate	0.11/sqft + 125	0.13/sqft + 139	0.16/sqft + 171	0.22/sqft + 228
Site Plan Review Fee	500 + billed for actual	actual	change in rate structure	550 + billed for actual	600 + billed for actual	750 + billed for actual	1000 + billed for actual
Site Plan Agreement Deposit - Compliance	Min. 3,000 max. 20,000 (based on 1% of construction value)	Min. 3,000 max. 20,000 (based on 1% of construction value)	0	Min. 3,000 max. 20,000 (based on 1% of construction value)	Min. 3,000 max. 20,000 (based on 1% of construction value)	Min. 3,000 max. 20,000 (based on 1% of construction value)	Min. 3,000 max. 20,000 (based on 1% of construction value)
Minor Redline Revision	3,000	3,000	0	3,000	3,000	3,000	3,000
Major Redline Revision	5,000	5,000	0	5,000	50,00	5,000	5,000
Deeming Bylaw - Admin Fee	257	500	95%	500	500	500	500
Deeming Bylaw Registration	1,000	1,000	0	1,000	1,000	1,000	1,000
Encroachment or Servicing Agreement Admin Fee	257	500	95%	500	500	500	500

Fee Schedule	Current (2025)	Flat Fee	Increase (Flat Fee)	10% Increase in Fees	20% Increase in Fees	50% Increase in Fees	100% Increase in Fees
Encroachment or Servicing Agreement Registration	1,000 deposit, billed for actual	1,000 deposit, billed for actual	0	1,000 deposit, billed for actual	1,000 deposit, billed for actual	1,000 deposit, billed for actual	1,000 deposit, billed for actual
Pre- consultation (Subdivision)	360.75	360.75	0	360.75	360.75	360.75	360.75
Plan of Subdivision Admin Fee	150 per block/lot	5000	change to flat rate	165 per block/lot	180 per block/lot	225 per block/lot	300 per block/lot
Plan of Subdivision Review/ Agreement	2,000 deposit, billed for actual	2,000 deposit, billed for actual	0	2,000 deposit, billed for actual	2,000 deposit, billed for actual	2,000 deposit, billed for actual	2,000 deposit, billed for actual
Final Approval of Subdivision/Phase of Being Registered	1,050	1,050	0	1,050	1,050	1,050	1,050
Draft Plan of Subdivision Approval Extension	500 (1st request), 800 (2nd request), 1,000 (3rd request)	500 (1st request), 800 (2nd request), 1,000 (3rd request)	0	500 (1st request), 800 (2nd request), 1,000 (3rd request)	500 (1st request), 800 (2nd request), 1,000 (3rd request)	500 (1st request), 800 (2nd request), 1,000 (3rd request)	500 (1st request), 800 (2nd request), 1,000 (3rd request)
Draft Plan of Subdivision Revival	150 per block/lot (min 3,000 max 9,000) + 1,000	150 per block/lot (min 3,000 max 9,000) + 1,000	0	165 per block/lot (min 3,000 max 9,000) + 1,000	165 per block/lot (min 3,000 max 9,000) + 1,000	165 per block/lot (min 3,000 max 9,000) + 1,000	165 per block/lot (min 3,000 max 9,000) + 1,000
Draft Plan of Condo Admin Fee	50 per unit (min 500)	3,000	change to flat rate	55 per unit (min 500)	60 per unit (min 500)	75 per unit (min 500)	100 per unit (min 500)

Fee Schedule	Current (2025)	Flat Fee	Increase (Flat Fee)	10% Increase in Fees	20% Increase in Fees	50% Increase in Fees	100% Increase in Fees
Draft Plan of Condo Review/ Agreement	2,000 deposit, billed for actual	2,000 deposit, billed for actual	0	2,000 deposit, billed for actual	2,000 deposit, billed for actual	2,000 deposit, billed for actual	2,000 deposit, billed for actual
Condo Exemption or Clearance Request	105	105	0	105	105	105	105
Fee payable for services by Municipal Solicitor	actual	actual	0	actual	actual	actual	actual
Fee payable for services by Municipal Engineer	actual +10%	actual +10%	0	actual +10%	actual +10%	actual +10%	actual +10%
Appeal to Ontario Land Tribunal	5,000 deposit, billed for actual	5,000 deposit, billed for actual	0	5,000 deposit, billed for actual	5,000 deposit, billed for actual	5,000 deposit, billed for actual	5,000 deposit, billed for actual
Release of Development Agreement	300 + actual registration costs	300 + actual registration costs	0	300 + actual registration costs	300 + actual registration costs	300 + actual registration costs	300 + actual registration costs
Request for Confirmation of Adequate Security and Releases	75	75	0	75	75	75	75
Parking Facilities Exemption	1,050	1,050	0	1,050	1,050	1,050	1,050
Official Plan or Secondary Plan Amendment	Charged by Bruce County	Charged by Bruce County	0	Charged by Bruce County	Charged by Bruce County	Charged by Bruce County	Charged by Bruce County

Fee Schedule	Current (2025)	Flat Fee	Increase (Flat Fee)	10% Increase in Fees	20% Increase in Fees	50% Increase in Fees	100% Increase in Fees
Zoning Bylaw Amendment	Charged by Bruce County	Charged by Bruce County	0	Charged by Bruce County	Charged by Bruce County	Charged by Bruce County	Charged by Bruce County
Application for Minor Variance	Charged by Bruce County	Charged by Bruce County	0	Charged by Bruce County	Charged by Bruce County	Charged by Bruce County	Charged by Bruce County
Removal of Holding Provision	155	500	223%	500	500	500	500
Letter of Compliance (Site Plan or Subdivision)	155	155	0	155	155	155	155
Consent/ Severance, Easements, Right of Ways	125	200	60%	200	200	200	200
Parkland Dedication	Land conveyance of 2% for commercial /industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion	Land conveyance of 2% for commercial/ industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion	0	Land conveyance of 2% for commercial /industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion	Land conveyance of 2% for commercial/ industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion	Land conveyance of 2% for commercial/ industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion	Land conveyance of 2% for commercial/ industrial land value, 5% for residential property value or cash-in-lieu at Municipality's discretion
Estimated Cost Recovery Level	12%	30%-40%		10-20%	20%-30%	20%-30%	30%-40%

Figure 4.11 Comparison of Proposed Site Plan Fees

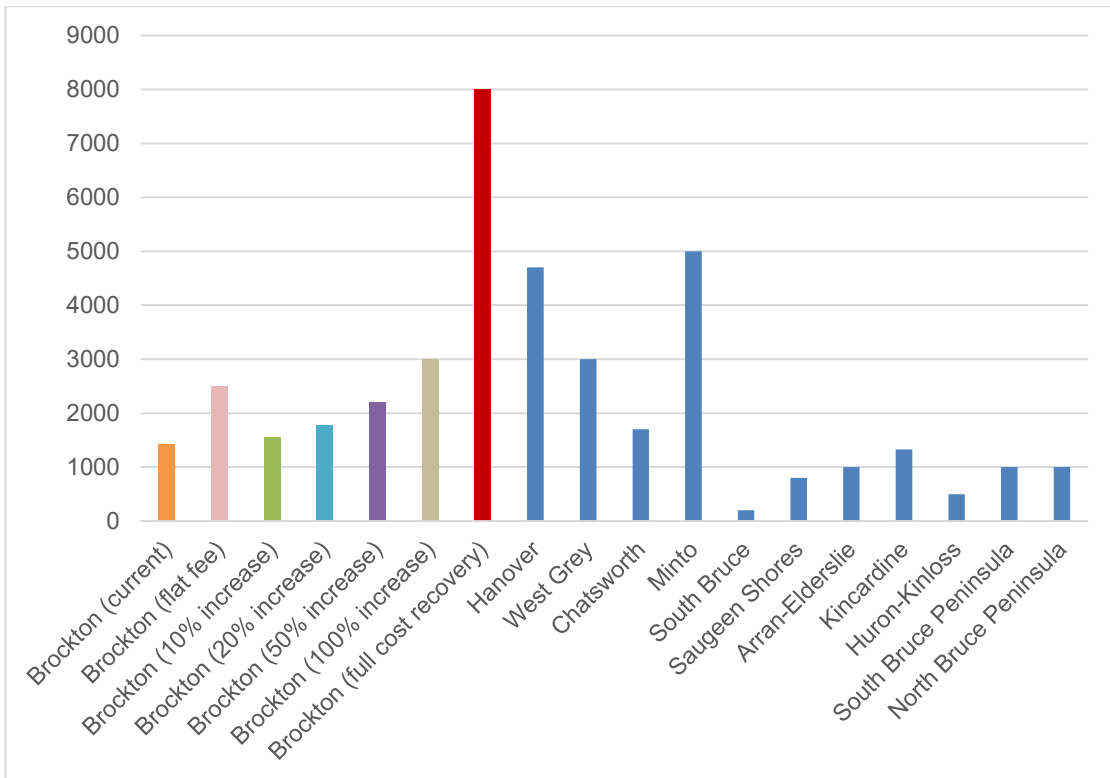


Figure 4.12 Comparison of Proposed Plan of Subdivision Fees

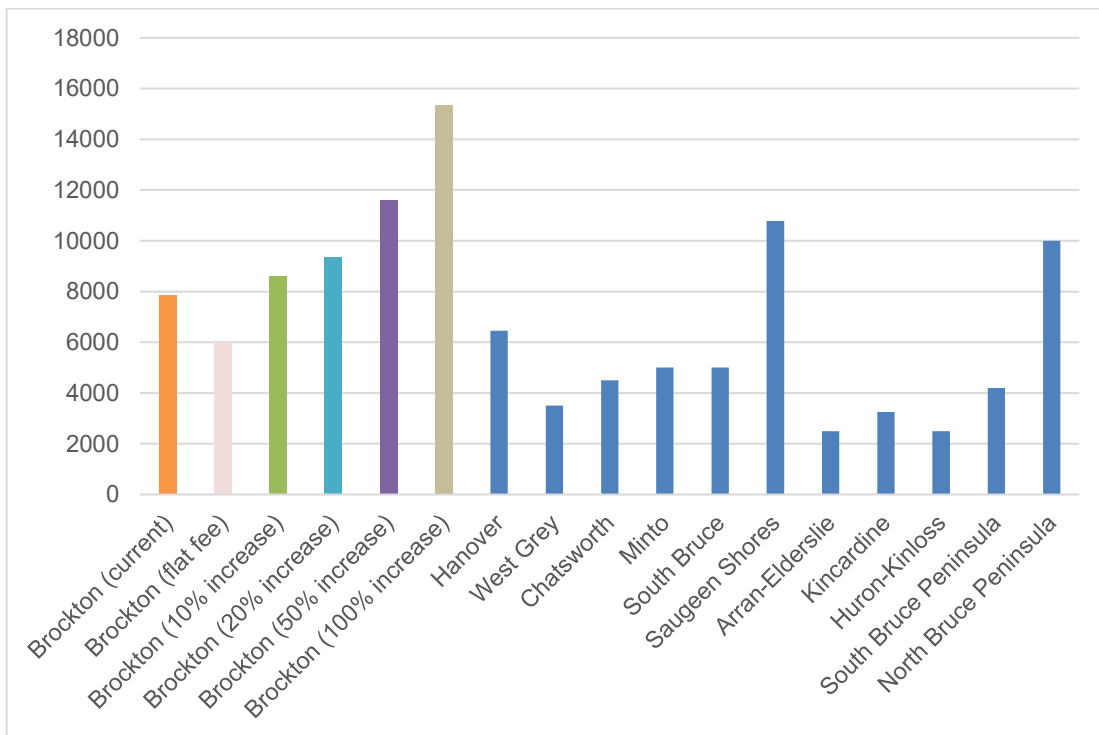
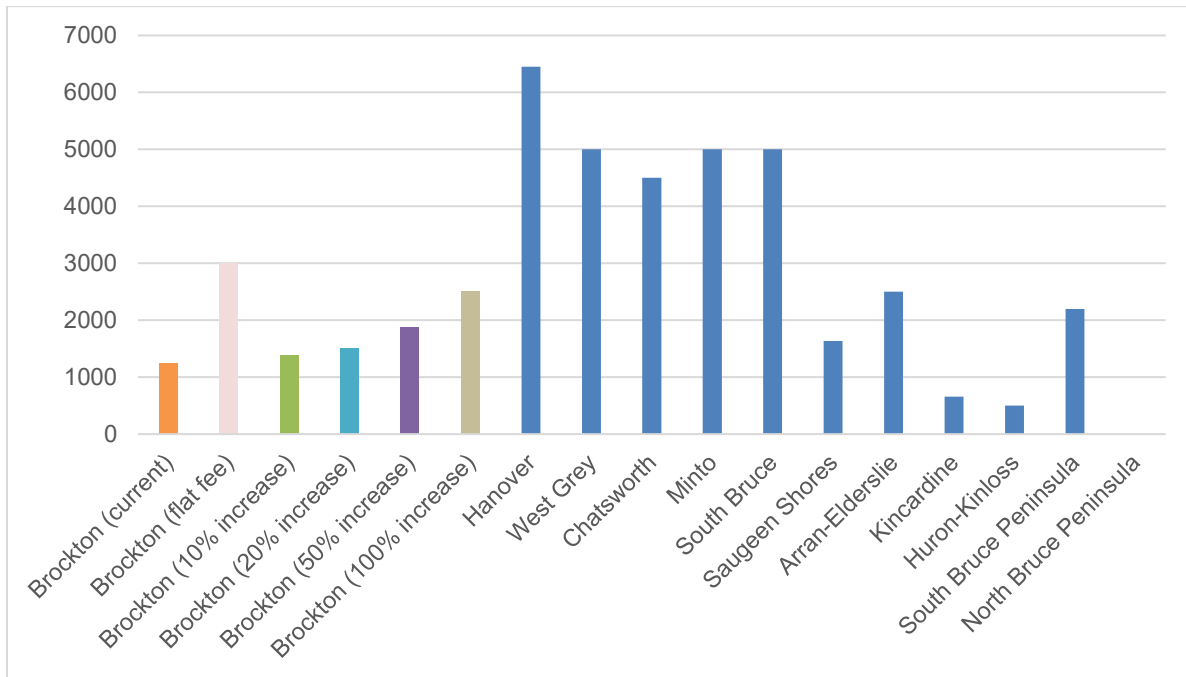


Figure 4.13 Comparison of Proposed Plan of Condominium Fees



The presented fee increases can be considered by staff and Council and an alternative fee structure implemented. The presented fees will achieve varying levels of cost recovery and have been considered in terms of local market competitiveness. Implementation of any of the fee structures presented in this report would be in compliance with the Planning Act, 2021 as the fees will achieve less than 100% cost recovery, based on available information. Ultimately, Council will make a determination on fees and how fee changes will be implemented.

4.4.1 New Fees

In the review of planning fees and from discussions with staff, there were gaps identified in certain fees missing from the current fee bylaw relating to planning matters. These matters include: renewable energy applications and development agreements for developments not subject to site plan or plan of subdivision/condominium requirements. These applications require staff time to review and respond, and costs should be recovered for those efforts.

Table 4.3 Proposed New Fees

Fee Description	Proposed Fee
Development Agreement – Administration Fee	\$1,000 per application
Development Agreement – Review	Actual costs invoiced
Battery Energy Storage Systems - Administration (pre-consultation)	\$1,000
Battery Energy Storage Systems – Review of reports, review of municipal support resolution, community benefits review)	\$5,000 + actual costs for any legal/engineering review.

Battery Energy Storage Systems are being proposed in municipalities across Ontario and require staff input and review of site reports, municipal support resolutions, community benefit agreements, and coordinating public consultation. The proposed fees above are recommended to ensure cost recovery for these efforts. In the future, costs should be reviewed against the time and costs associated with any battery energy storage system applications received. These fees would be addition to any required site plan review fees.

Staff and Council can consider these proposed new fees in addition to the proposed alternative fee structures.

5.0 RESERVE FUND ANALYSIS

A review of the reserve fund balance was undertaken with the review of planning fees. There are a number of major upcoming expenses that are expected to be funded from the planning reserve fund. These expenses include:

- Retaining a consultant to undertake an update to the Zoning Bylaw and Official Plan. The cost for this project is \$125,200.
- A portion of the costs for future replacement of two vehicles used by the Building and Planning department staff. It is assumed the replacements will be compact SUVs with costs of approximately \$41,000. It is assumed these vehicles will be purchased in 2027 and 2028.

The transfers in and out of the reserve fund from 2021 to 2028 are shown in Table 5.1. In 2024, \$60,000 was transferred into the reserve as part of the municipal budget process for the Zoning Bylaw and Official Plan Update. For 2025 to 2028, it was assumed the only transfers into the reserve will be interest (2% annual). It was also assumed the remaining \$65,183 for the Zoning Bylaw and Official Plan Update will be funded from the reserve over 2025 and 2026. This will reduce the fund from 109,000 in 2024 to approximately \$47,800 at the end of 2026. Further, it was assumed that 15% of the cost of two \$41,000 vehicles will be funded from the reserve in 2027 and 2028. Following these transfers, the reserve fund will still have a balance of over \$35,000.

Table 5.1 Reserve Fund Transfers (2021-2028)

Year	Transfer Into Reserve (\$)	Transfer Out of Reserve (\$)	End of Year Balance (\$)
2021	180.09	61.69	19,891.50
2022	25,385.92	0.00	45,277.42
2023	1,611.48	0.00	46,888.90
2024	63,018.18	638.56	109,268.52
2025	2,185.37	32,591.50	78,862.39
2026	1,577.25	32,591.50	47,848.14
2027	956.96	6,150.00	42,655.10
2028	853.10	6,150.00	37,358.20

6.0 CONCLUSIONS

From the analysis of planning fees undertaken, the Municipality of Brockton should give consideration to increasing select planning fees to increase the level of cost recovery for planning applications. Currently, cost recovery for the planning department, based on reported revenue and expenses is 12%. Alternative fee structures proposed in Section 4.4 could achieve cost recovery levels between 30-40%. Additionally, there are new fees that staff and Council can consider adding to the fee structure for development agreements and battery energy storage systems.

It is also recommended that staff consider tracking staff time spent on planning applications to allow for a future evaluation based on processing times and efforts.

Council may implement changes to the planning fees through an amendment to the Fees and Charges Bylaw. Under the Planning Act, a public meeting is not required prior to the implementation of any changes to the fees.

All of which is respectfully submitted.

Yours very truly

B. M. ROSS AND ASSOCIATES LIMITED

Per _____

Lisa J. Courtney, MCIP, RPP

Senior Planner