



# MUNICIPALITY OF BROCKTON PLANNING FEES REVIEW



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## PLANNING FEES REVIEW

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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 Consent	3	5	2	6	7	8	14	7	2	3	57
Zoning	7	14	14	9	15	8	14	14	11	15	123
Local OPA	6	10	16	13	14	8	14	17	10	5	114
County OPA	2	1	1	0	1	1	1	0	1	1	9
Plan of Subdivision /Condo	0	2	4	2	3	1	3	2	1	2	20
Site Plan	1	0	1	1	0	0	1	1	1	1	7
Total					1	0	7	8	6	3	27
<b>Total</b>	<b>19</b>	<b>32</b>	<b>38</b>	<b>31</b>	<b>41</b>	<b>26</b>	<b>54</b>	<b>49</b>	<b>32</b>	<b>30</b>	<b>357</b>

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 therefore 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, mileage, 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

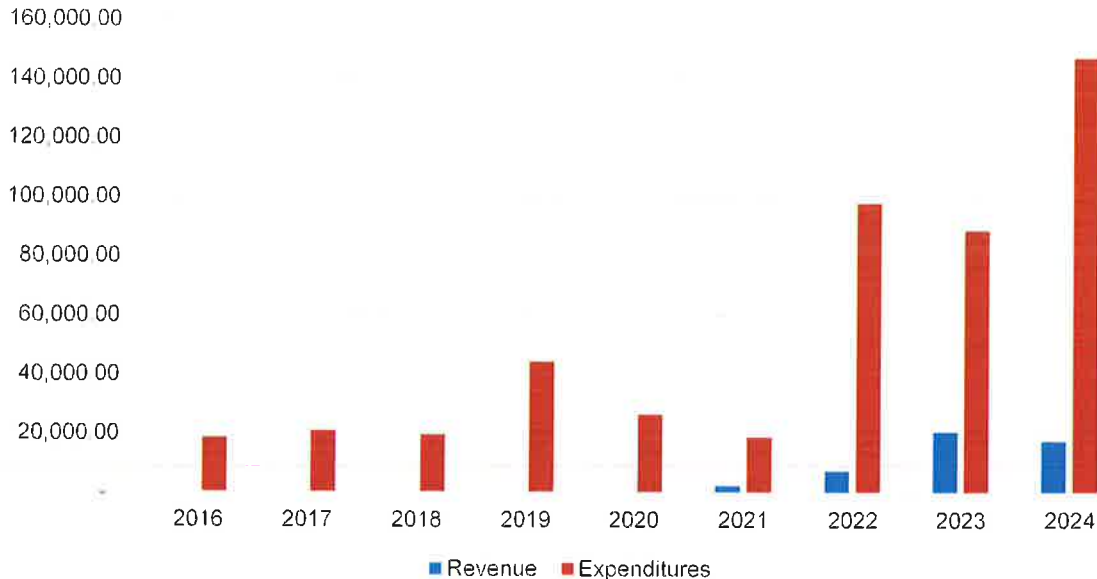
Prior to 2022, transfers into the reserve were limited to interest payments. Starting in 2022, the Municipality transferred monies into the reserve following the budget process for the upcoming zoning bylaw and official plan review. In 2022, an initial \$25,000 was transferred, followed by \$60,000 in 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.

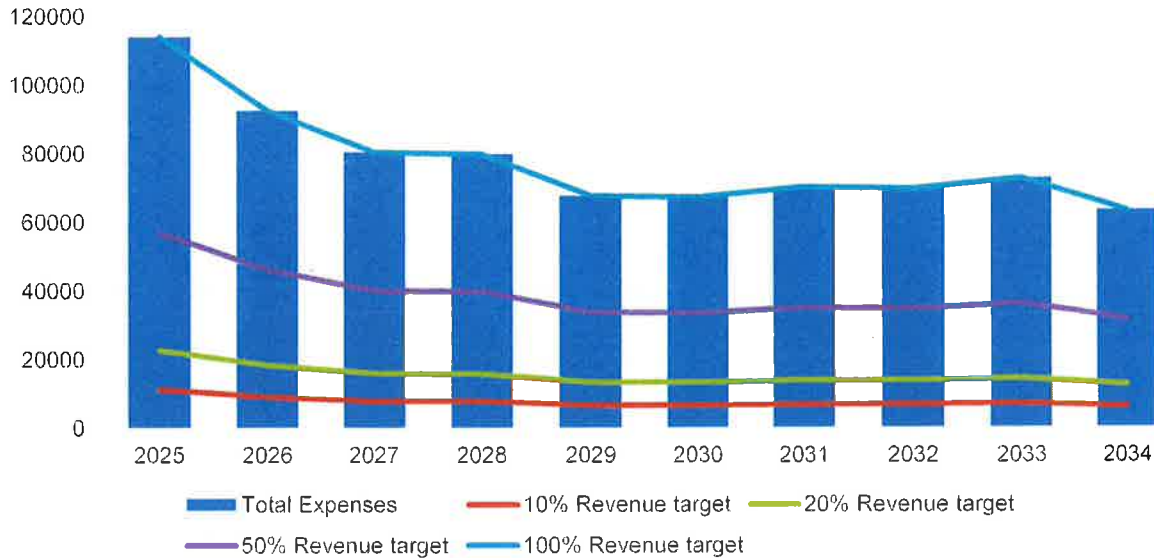
**Figure 4.1 Planning Revenue and Expenditures (2016-2024)**



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.

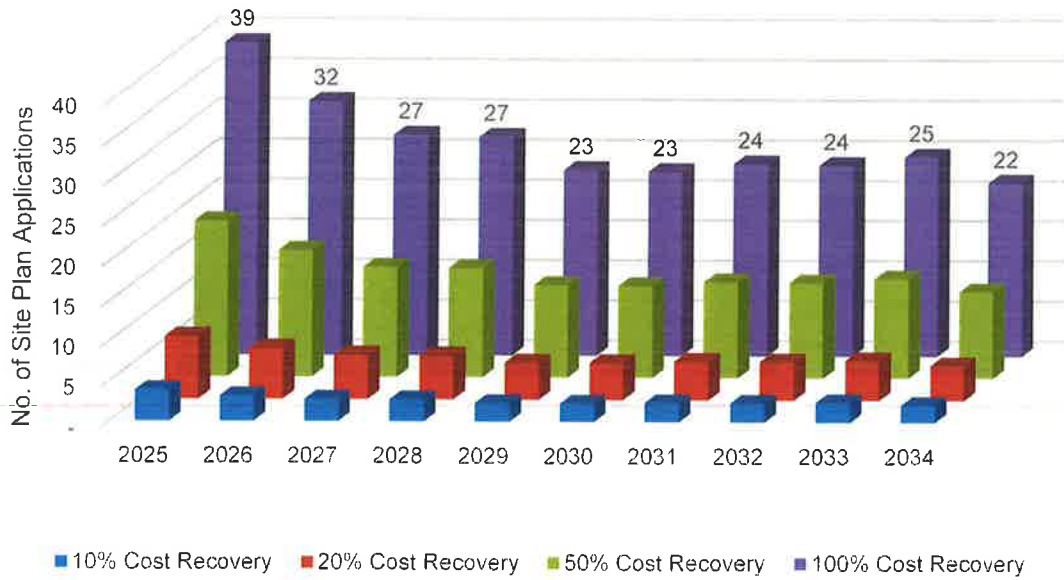
**Figure 4.2 Forecasted Expenditures and Revenue Based on Cost Recovery Targets**



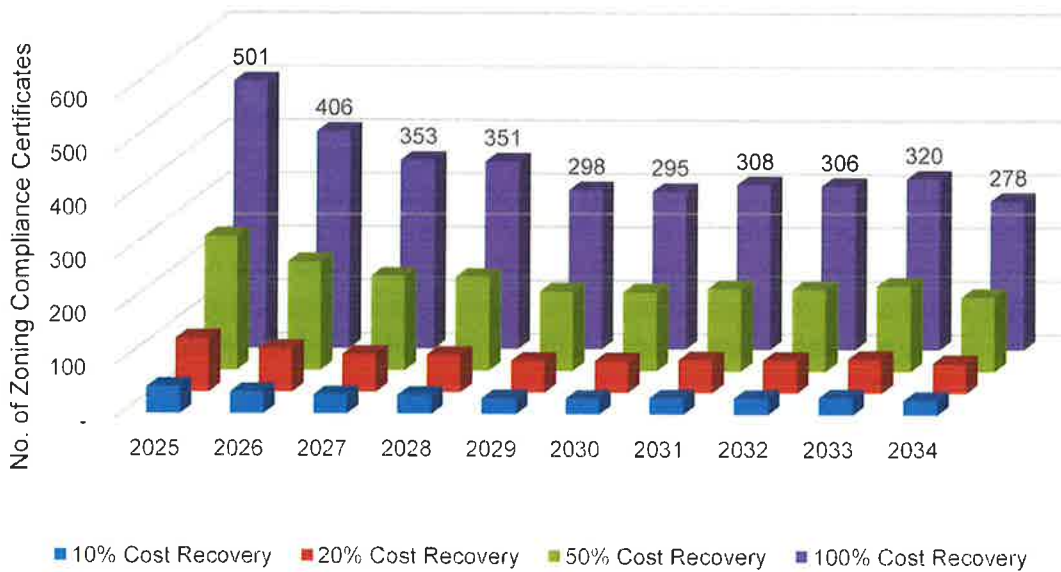
Over the forecast period, it is expected that expenditures will decrease from approximately \$110,000 in 2025 to \$63,000 in 2034. The decrease in expenditures is primarily driven by a forecasted decrease in the service agreements, as major planning projects are completed. Expenditures are believed to 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**

<b>Fee Schedule</b>	<b>2024</b>	<b>2025</b>
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

<b>Fee Schedule</b>	<b>2024</b>	<b>2025</b>
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

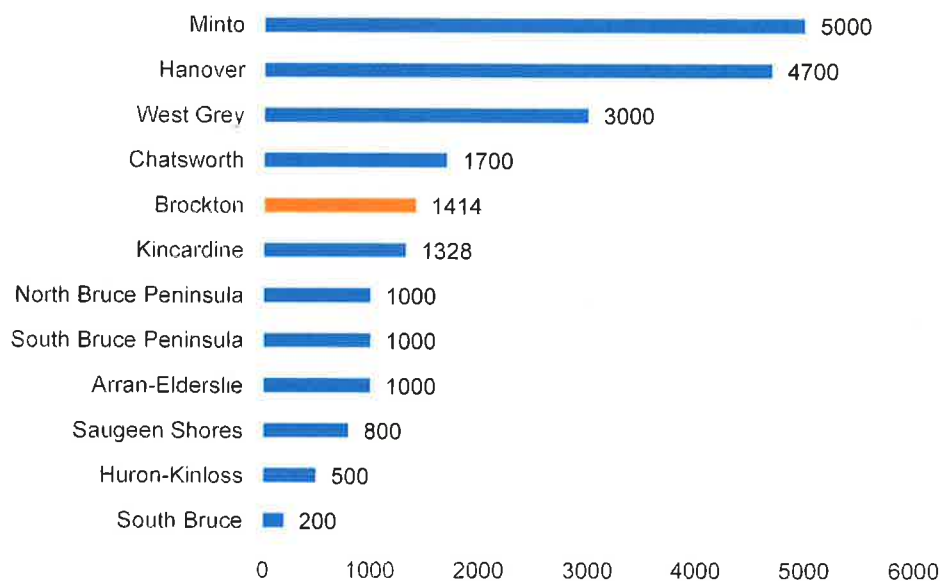
Planning fees vary between municipalities, as each municipality sets their own fees. A comparison of planning fees was undertaken to gain an understanding of the fees within other municipalities within Bruce County and those within close proximity to Brockton. This exercise will help provide a framework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

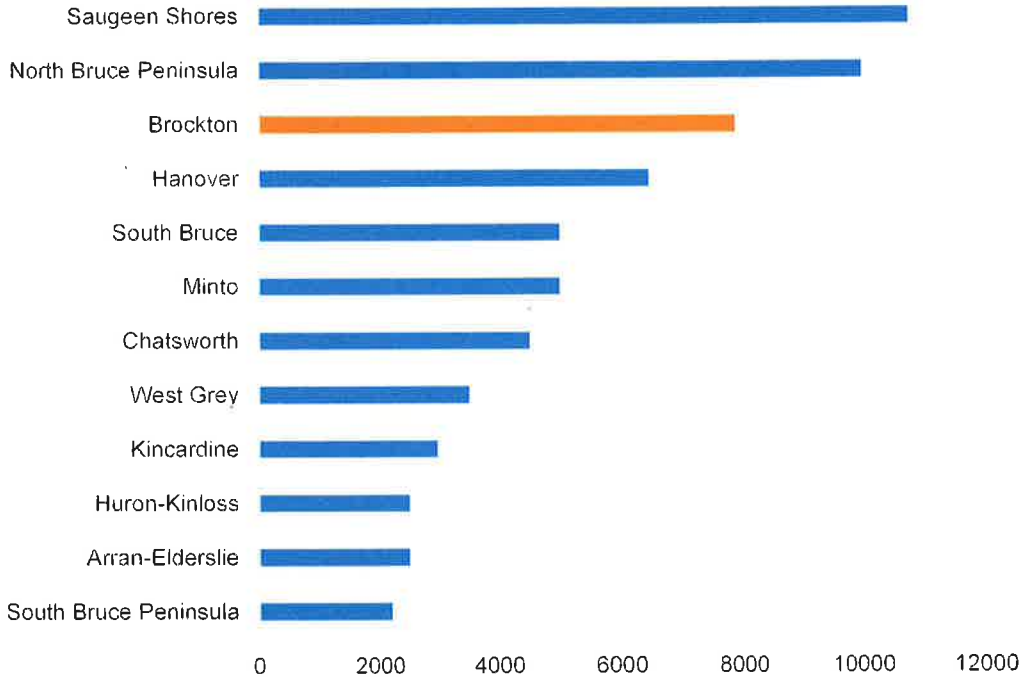
The fees for a site plan with 14 units, with a total of 8,000 square feet, in the different municipalities in Bruce County and adjacent to Brockton are shown in Figure 4.5. Note, the fees shown in Figure 4.5 include only administration fees and not refundable deposits for review of site plans. The majority 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.

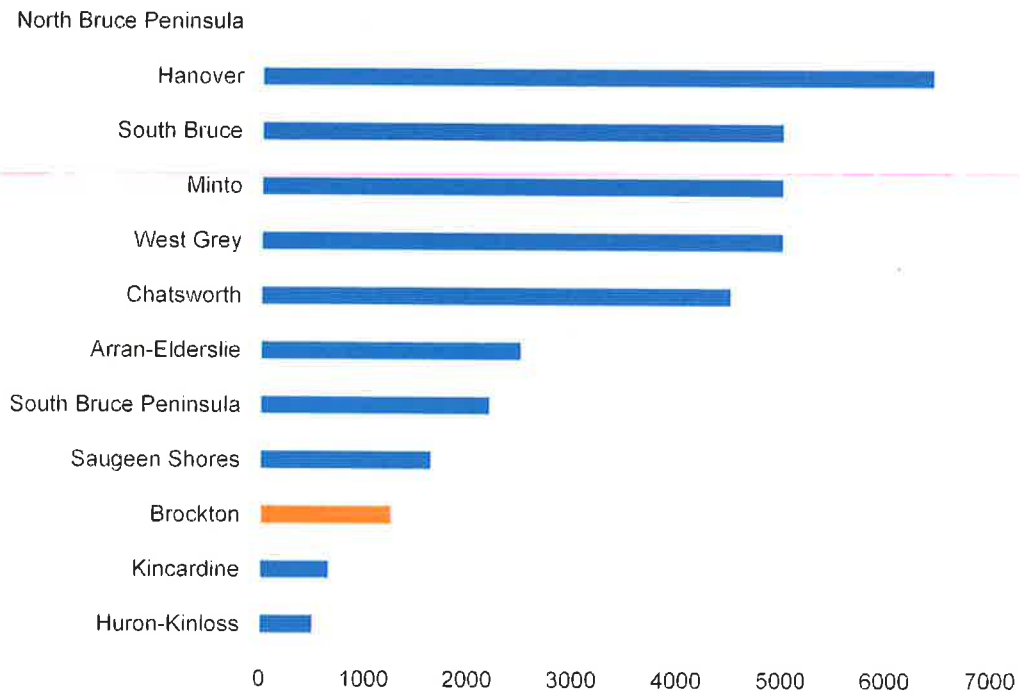
**Figure 4.6 Local Plan of Subdivision Fees**



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.

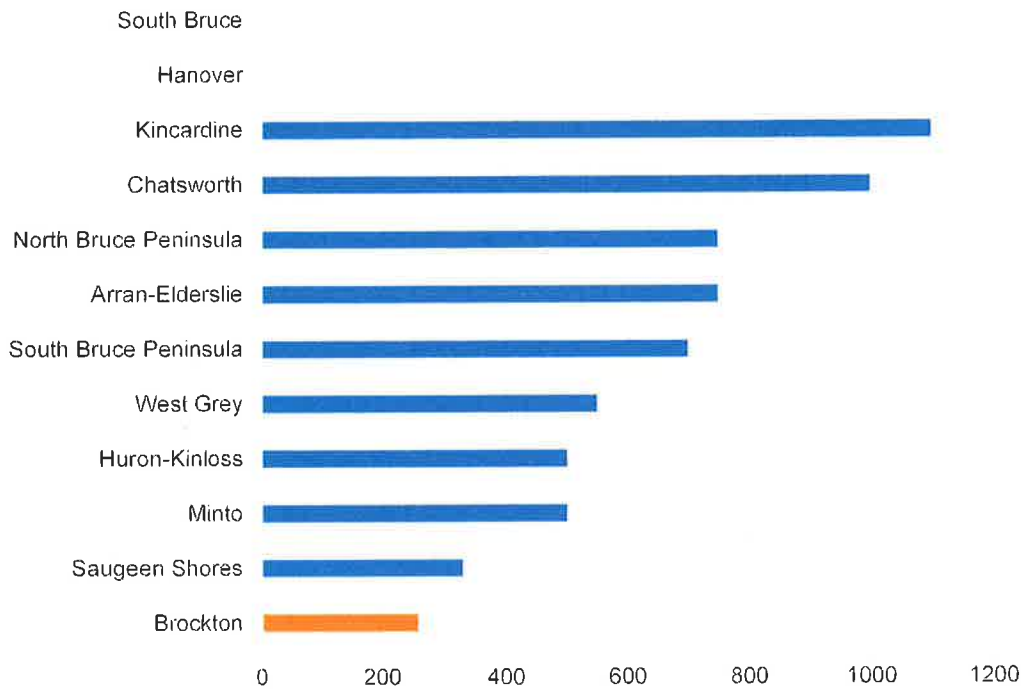
The plan of condominium fees reviewed (see Figure 4.7), like plan of subdivision fees, include flat fees and charges per unit. Brockton and Saugeen Shores charge fees based on the number of units proposed. Similar to the fees for site plans, fees are generally higher in the municipalities outside of 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**



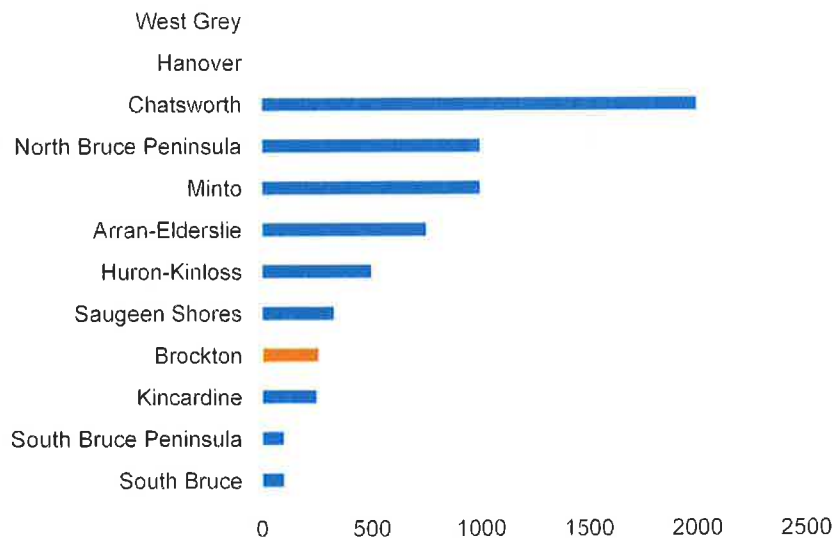
The fees for deeming by-law applications are shown in Figure 4.8. The current fee in Brockton is \$275, which is the lowest fee compared to the other municipalities reviewed. The fees range from \$1,100 in Kincardine to \$330 in Saugeen Shores. The fee by-laws for Hanover and South Bruce did not include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

**Figure 4.8 Local Deeming Bylaw Application Fees**



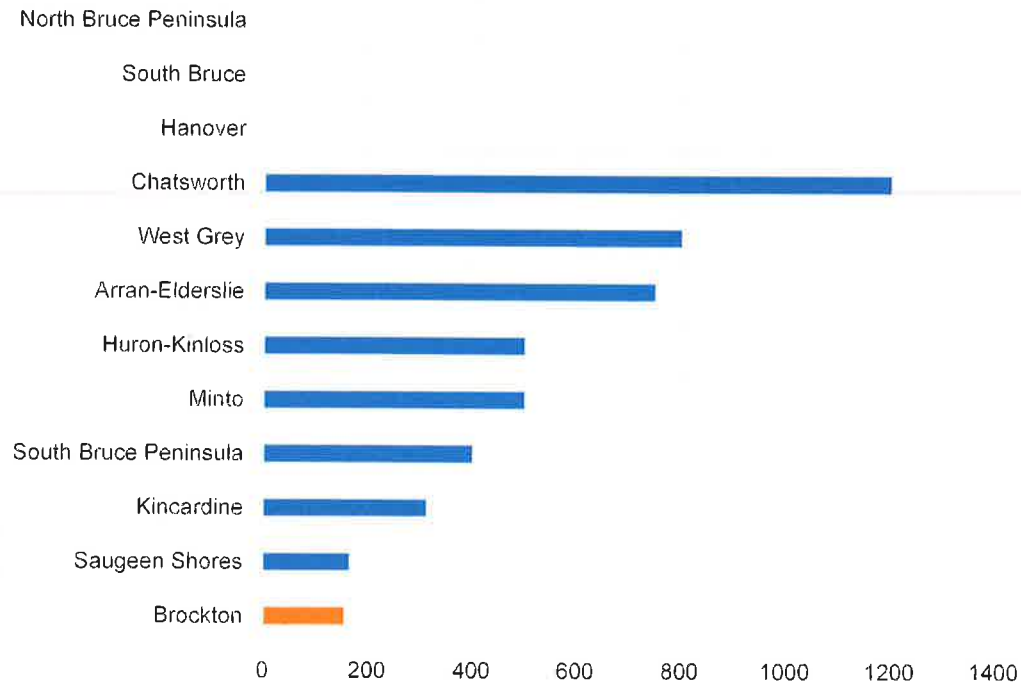
Encroachment application fees were also reviewed and compared across adjacent municipalities (Figure 4.9). Fees vary from \$100 in South Bruce Peninsula and South Bruce to \$2,000 in Chatsworth. The average fee is \$628, which is more than the current fee in Brockton (\$257).

**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 Chatswoth. 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**

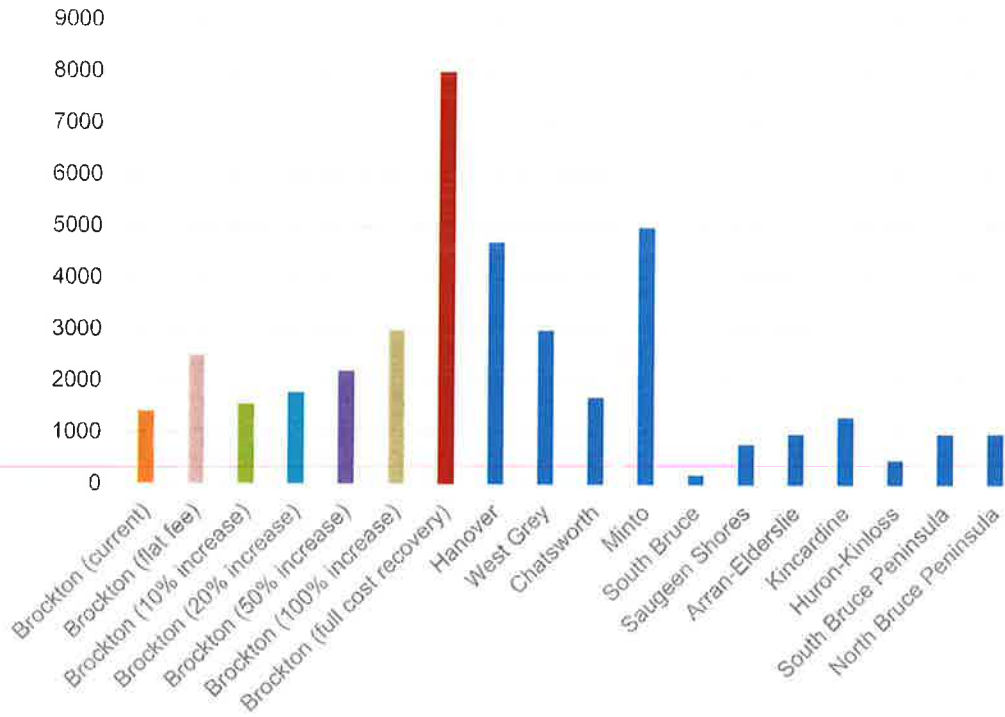
Fee Schedule	Current (2025)	Flat Fee	Increase (Flat Fee)	10% Increase in Fees	20% Increase in Fees	50% Increase in Fees	100% Increase in Fees
<b>Certificate of Zoning Compliance</b>	107.25	125	17%	117.98	128.70	160.88	321.76
<b>Site Plan Agreement Admin Fee</b>	0.10/sqft + 114	2500	change to flat rate	0.11/sqft + 125	0.13/sqft + 139	0.16/sqft + 171	0.22/sqft + 228
<b>Site Plan Review Fee</b>	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
<b>Site Plan Agreement Deposit - Compliance</b>	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)
<b>Minor Redline Revision</b>	3,000	3,000	0	3,000	3,000	3,000	3,000
<b>Major Redline Revision</b>	5,000	5,000	0	5,000	50,00	5,000	5,000
<b>Deeming Bylaw - Admin Fee</b>	257	500	95%	500	500	500	500
<b>Deeming Bylaw Registration</b>	1,000	1,000	0	1,000	1,000	1,000	1,000
<b>Encroachment or Servicing Agreement Admin Fee</b>	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
<b>Encroachment or Servicing Agreement Registration</b>	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
<b>Pre-consultation (Subdivision)</b>	360.75	360.75	0	360.75	360.75	360.75	360.75
<b>Plan of Subdivision Admin Fee</b>	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
<b>Plan of Subdivision Review/Agreement</b>	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
<b>Final Approval of Subdivision/Phase of Being Registered</b>	1,050	1,050	0	1,050	1,050	1,050	1,050
<b>Draft Plan of Subdivision Approval Extension</b>	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)
<b>Draft Plan of Subdivision Revival</b>	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
<b>Draft Plan of Condo Admin Fee</b>	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)

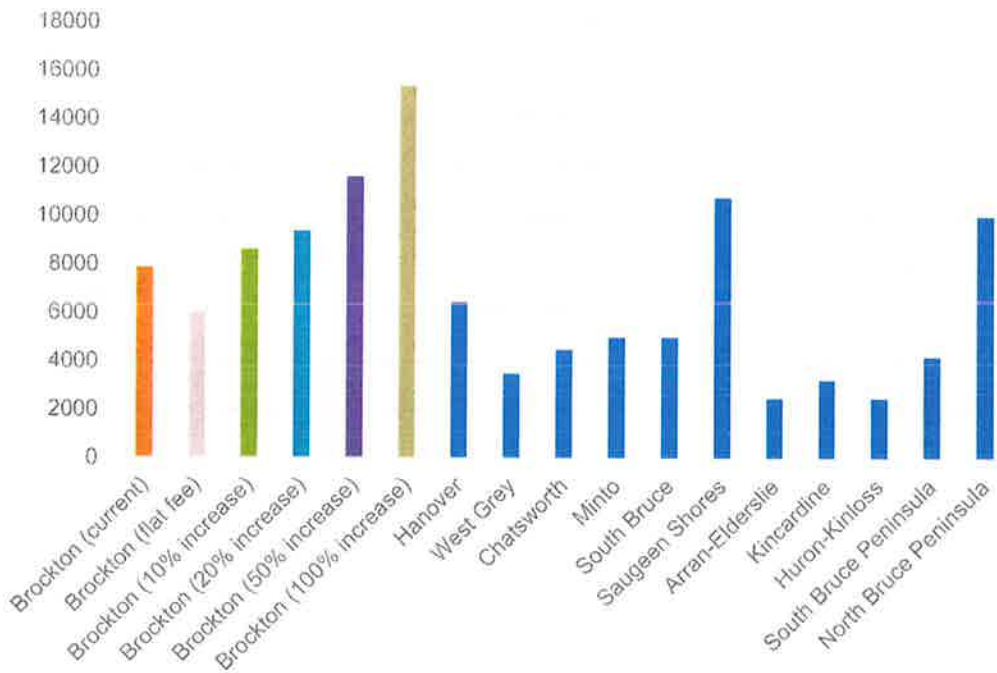
<b>Fee Schedule</b>	<b>Current (2025)</b>	<b>Flat Fee</b>	<b>Increase (Flat Fee)</b>	<b>10% Increase in Fees</b>	<b>20% Increase in Fees</b>	<b>50% Increase in Fees</b>	<b>100% Increase in Fees</b>
<b>Draft Plan of Condo Review/ Agreement</b>	2,000 deposit, billed for actual	2,000 deposit, billed for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

<b>Fee Schedule</b>	<b>Current (2025)</b>	<b>Flat Fee</b>	<b>Increase (Flat Fee)</b>	<b>10% Increase in Fees</b>	<b>20% Increase in Fees</b>	<b>50% Increase in Fees</b>	<b>100% Increase in Fees</b>
<b>Zoning Bylaw Amendment</b>	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
<b>Application for Minor Variance</b>	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
<b>Removal of Holding Provision</b>	155	500	223%	500	500	500	500
<b>Letter of Compliance (Site Plan or Subdivision)</b>	155	155	0	155	155	155	155
<b>Consent/Severance, Easements, Right of Ways</b>	125	200	60%	200	200	200	200
<b>Parkland Dedication</b>	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
<b>Estimated Cost Recovery Level</b>	12%	30%-40%		10-20%	20%-30%	20%-30%	30%-40%

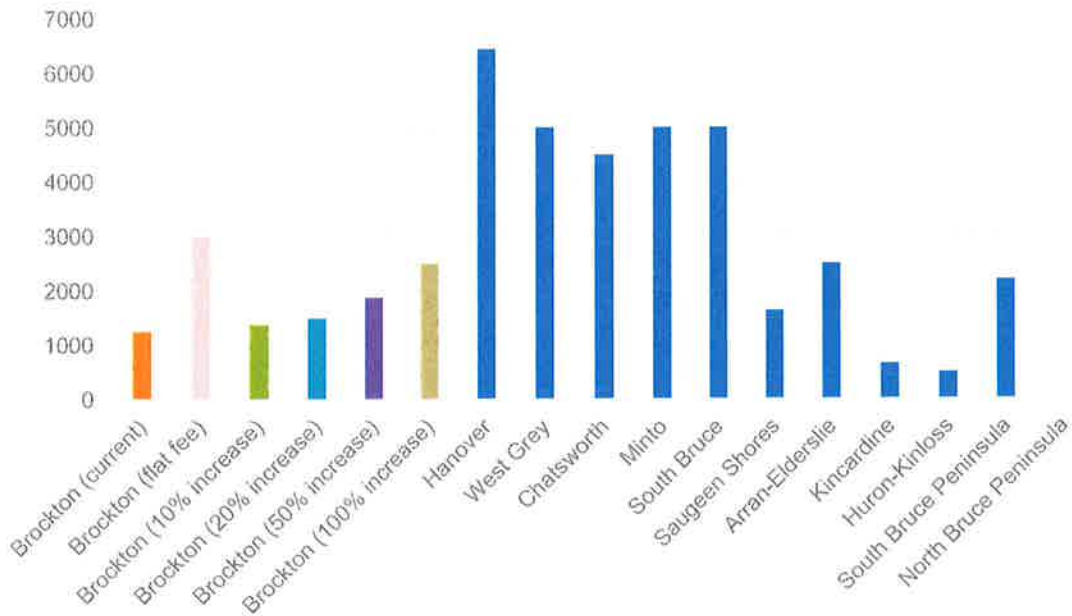
**Figure 4.11 Comparison of Proposed Site Plan Fees**



**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**

<b>Fee Description</b>	<b>Proposed Fee</b>
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)**

<b>Year</b>	<b>Transfer Into Reserve (\$)</b>	<b>Transfer Out of Reserve (\$)</b>	<b>End of Year Balance (\$)</b>
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   
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 Lisa J. Courtney, MCIP, RPP  
 Senior Planner