



BUILDING A GREATER GTA
Building Industry and Land
Development Association

June 2, 2020

Chair Iannicca and Members of Council
10 Peel Centre Drive, Suite A and B
Brampton, ON
L6T 4B9

Dear Chair Iannicca and Members of Council,

RE: Peel Region Development Services Fee Review

In Peel region, the building and renovation industry provides over 4.9 billion in investment value and employs over 39,000 people¹. As a simple rule of thumb one crane in the sky is equal to 500 jobs. With approximately 1,500 member companies, BILD is the voice of the home building, land development and professional renovation industry in the Greater Toronto Area and Simcoe County. Residential Construction is a key economic driver to every community in Canada.

On behalf of the Building Industry and Land Development Association (BILD) Peel Chapter members, we would like to take this opportunity to thank Staff for participating in our May 19th Peel Chapter meeting. Their attendance provided our members with the opportunity to hear from Peel Staff and discuss the Region's Development Services fee review, which we understand will be brought forward to Council for approval in June 2020.

Our Association and the Region of Peel have maintained a strong working relationship and we recognize the work involved to undertake this review. We also appreciate this relationship and the subsequent consultation on this item. With that said, from the time of March 18th – when the Region declared the state of emergency – and extending beyond today's date, the reality of our circumstances as we navigate the unknown but significant effects of COVID-19 has required us all to make adjustments.

We respectfully ask that Council defer the review the Development Services fees until this period of disruption due to COVID-19 has passed.

We believe an approach like we have seen in Ontario Regulation 131/20(which resulted in all municipal noise by-laws across Ontario being suspended for the next 18 months) is an example of an effective measure that takes a realistic disruption timeframe into account.

Furthermore, on behalf of the Building Industry and Land Development Association (BILD) and its Peel Chapter members, we submit the following additional comments to you in regards to the Region's Development Services fee review. We believe these items require further dialogue between stakeholders and the Region, and with that, we welcome those conversations.

Fee Cap/Cost Recovery

The Planning Act allows municipalities to charge fees based upon the anticipated costs to process the application. BILD therefore believes that the Region's anticipated cost to process or review an application should not surpass the cost of completing the work by the applicant's consultant. Further, BILD would

¹ Based on 2018 Canadian Mortgage and Housing Corporation and Statistics Canada data

recommend the addition of a capped rate for any fees being charged at a percentage, specifically the fees related to traffic development inspections.

There is an inherent redundancy of costs between the Region and its local area municipalities that should be acknowledged through both the implementation of these fees, and through the anticipated staff time being allocated to these items.

Level of Service

In recognition of the Region's fee recommendations intended to recover the full cost of service, BILD would like to receive further information on the Region's consideration of staff time as a benefit to existing residents. We would like to better understand the consideration of items such as resident inquiries that are not related to a development application, as well as the peripheral relationship of Regional Staff monitoring overall development as a benefit to existing residents and their interests.

In principle, the industry believes that growth must pay for growth, and in turn we also firmly believe that any increase in application fees should be commensurate with the level of service standards and accompanied by a clear rationale. In review of the York Region 2020 fees, our membership requested additional disclosure materials related to staffing and further analysis outlining the methodology of the review. We believe these additional materials and transparency proved commensurate levels of service to the industry. As a result, BILD was able to submit a positive letter to Council.

BILD firmly believes that any increase in fees must always be met with demonstrated improvements to levels of service received by the applicant. BILD would like to ensure that performance measures are implemented with this fee review, and that they involve adherence to timelines and other matters. As it stands today, there have been many changes made to the way applications and permits are being processed to prioritize safety during COVID-19. We believe these changes have translated into a number of streamlining initiatives which have positively impacted performance measures and should therefore reduce the amount of time Staff will require to administer and review files. It is unclear if these impacts have been accounted for in the background study and this furthers our position in requesting a deferral.

As your community building partners, we look forward to a continued positive and transparent working relationship in the years to come. We trust you will find our comments helpful and should you have any questions please do not hesitate to contact the undersigned.

Stay safe and healthy,



Jennifer Jaruczek
Planner, Policy and Advocacy BILD

CC: Gavin Bailey, BILD Peel Chapter Co-Chair
Katy Schofield, BILD Peel Chapter Co-Chair
John Hardcastle, Peel Region
Joe Vieira, Peel Region