

Council February 15, 2022

PL-07-22

Correspondence from WE HBA

Members of City Council,

City of Burlington

426 Brant St, Burlington, ON, L7R 3Z6

February 14, 2022

West End Home Builder's Association | Response to Further Industry Consultation

The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Burlington. The WE HBA represents approximately 300 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. In 2020, the residential construction industry employed over 25,300 people, paying \$1.7 billion in wages, and contributed over \$3 billion in investment value within Halton Region. WE HBA is proudly affiliated with both the Ontario and Canadian Home Builders' Associations.

The West End Home Builders' Association appreciates the opportunity provided to the industry to review the proposed increases. Our members continue to have concerns that remain unresolved; therefore we are opposed to the substantial increase in fees. For the purpose of simplicity, we are only commenting on the Official Plan Amendment fees in this letter.

The Official Plan Amendment application fee is proposed to increase from approximately \$23,000 to \$114,000 (509%) and this fee excludes other costs that are paid separately by the building industry such as the design review panel and voluntary pre-submission community information meetings. The \$114,000 fee is the cost equivalent of approximately one year's salary for a senior planner. However, this fee is solely used to cover costs related to one Official Plan amendment application review within the statutory review timeline. While we recognize there are other departments involved in the review of planning applications, most of the work is preformed by the Planning Department, and it is bound by the statutory 120-day period that has been directed by City Council. During this 120-day processing period, City Planning staff are required to review, circulate, analyze and provide recommendations on the application to Council for its decision. The proposed fee increases for an Official Plan Amendment amounts to a charge that is higher than the planner's salary for the entire year.

It should also be noted that in most cases, zoning applications are submitted at the same time and processed concurrently. Traditionally, for a number of practical reasons, concurrent files are assigned to the same planner. The proposed zoning amendment fees are generally comparable to the proposed official plan amendment fee, although the planning application fees double for a combined application, the same planner is required to respond within the same statutory timeline. WE HBA suggests it would be virtually impossible to use this amount of staff time only for the review of one official plan amendment application or combined application within the 120 days as this would be the equivalent of \$1,900 per day, everyday, including weekends for 120 days.

Finally, WE HBA continues to recommend putting in place an Official Plan and zoning framework that reflects accommodating the necessary supply of housing for population growth and has a vision towards



the future. This would establish an as-of-right framework in growth nodes and therefore decrease the number of major applications requiring multiple layers of planning approvals. Based on Watson's historical analysis, the City of Burlington receives an average of 6.5 major Official Plan Amendments per year, 11 major zoning changes per year, and 16 major site plan applications per year. Given these figures, Burlington's current planning framework should be shifted towards a more permissive framework that allows more major applications in designated growth areas to proceed straight to site plan approval. This would result in a lessening of the overall burden on Staff capacity that has been identified and provide a more efficient process for housing providers.

WE HBA would like to thank Council and Staff for providing the opportunity through consultation to review additional materials. However, our association continues to have concerns with the full range of proposed planning application fees, as the City has yet to demonstrate how the increased fees will enhance service delivery to our members. Should Council proceed with the increase, despite industry opposition, we look forward to continued dialogue on how any corresponding improvements in service delivery will be provided.

Sincerely,

A handwritten signature in black ink that reads 'Michelle Diplock'.

Michelle Diplock, M.P.I.
Manager of Planning & Government Relations
West End Home Builders' Association

