



October 25, 2016

Mayor John Tory and members of the Toronto Executive Committee
10th floor, West Tower
City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

RE: EX18.14, Development Application Review Fee Update

On behalf of the members of the BILD Toronto Chapter, we kindly submit the following comments to you regarding agenda item EX18.14, Development Application Review Fee Update, in advance of the October 26th City of Toronto Executive Committee meeting.

We appreciate that staff organized a consultation meeting on September 9th with our membership and shared the proposed changes in advance. This allowed our members to review the changes and contribute to more meaningful dialogue during this meeting. During the consultation period, information and correspondence were exchanged with City staff that helped to establish greater clarity for the application fees. As such, our comments below are being provided on a principle basis of increased application fees.

BILD would like to underscore the importance of responsibly managing fees and costs imposed on new development, as these costs are ultimately reflected in the cost of new housing (paid by the new residents of the City) and in the cost of doing business for industrial or commercial employers (i.e. job-creators). The cumulative effect of taxes, fees and charges in the City of Toronto is of the utmost importance to our industry as we collectively strive to meet the goals and objectives of delivering affordable housing in the City of Toronto.

The industry is committed to the principle that growth must pay for its proportional share of growth and in turn, development will pay its fair share for the applicable reviews necessary to achieve this objective. With this sentiment in mind, the keyword for our industry is "fair." Fairness is demonstrated through accountability and transparency in the fee methodology and by its appropriate implementation for the applicant. Ultimately, City staff should also have great certainty that the total application costs for a given project truly reflects the reality of the work and that they are not overestimated for reserve purposes. Our membership acknowledges that significant increases are proposed in an effort to achieve full cost recovery of the planning application fees and our members continue to believe that greater credence should be paid to the levels of service associated to these fee increases.

Thank you for the opportunity to submit these comments. If you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,

Danielle Chin MCIP RPP
Senior Manager, Policy & Government Relations

CC: *Paula Tenuta, Vice President, Policy & Government Relations, BILD*
Gary Switzer, BILD Toronto Chapter Chair
Karen McNabney, Manager, Business Performance & Standards, City Planning, City of Toronto
BILD Toronto Chapter members