



Bruce County: Development Fees Review

Report Findings on Cost Under-Recovery and Fee Correction

November 2020

Agenda

- 1. Executive Summary**
- 2. Methodology**
- 3. Summary of our Review's Findings:**
 - Activity-Based Costing Findings
 - Comparator Municipalities
 - External Stakeholders Survey
- 4. Fee Schedules for Cost Under-Recovery Correction**
- 5. Recommendations**

Executive Summary

Findings: Our study of the internal costs of the land use planning service delivery of Bruce County shows cost recovery from three different perspectives. From the perspective of direct activity costs directly attributable to providing the service, cost recovery is, on average, at approximately 50%. Our research of comparable Counties showed that Bruce County's development application fees are below the peer group's average – in some cases the lowest and even half the fee of comparable Counties. On balance, the external stakeholder survey of developers in Bruce County expressed satisfaction with the level of service, minor concern with process complexity, and a suspicion that the department is understaffed in cases of prolonged response time. For the developer participants, they consider the fees to be less than 2% of total development costs and either lower or at par with some of the lower-fee Counties that they do business in.

Recommendations for Correction of Cost Under-Recovery by User Fees: Based on our review of Bruce County's Development Applications Fees, we identify and recommend to Council and the Administration six ways improve cost recovery, which can enhance management of resources and the speed of service delivery.

1. Fee convergence to cost recovery
2. Fee structure amendments
3. Introduction of new fees
4. Introduction of deposit for peer reviews
5. Phase-in of fee corrections for cost recovery
6. Annual corrections by CPI Rate, post period of major fee adjustments

Should the County decide to implement these recommendations, it is estimated that it can yield tax base burden savings that are equivalent to almost 1 full percentage point of the tax rate, or 25 percentage points of the Planning Department's levy.

Methodology

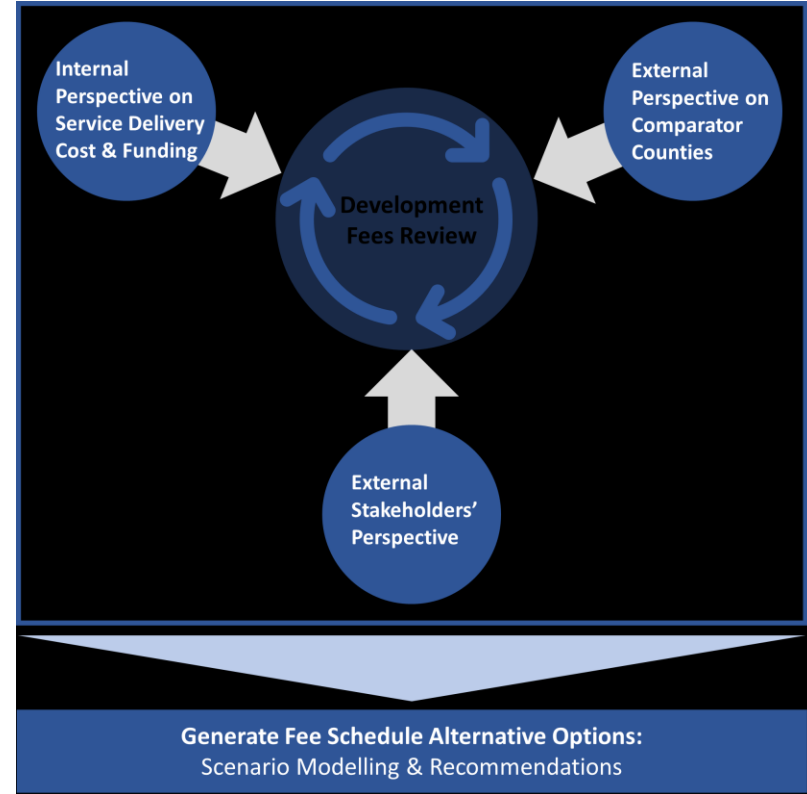
Planning Fees Review Methodology

Interim Report Objectives:

- to inform the first discussion of Bruce County's Planning and Development Committee, today, regarding the review of fees for development applications.
- to inform the Service Agreement discussion between the County and Local Municipalities.

Final Report Objectives:

- External Stakeholder Input (eg. frequent developers in Bruce County)
- Fee Schedule Alternative Options
- Recommendations and Conclusions



Segmentation of Activities

Fee Related Activities

1. Variances
2. Consent
3. Zoning
4. Local OP
5. County OP
6. Subdivision & Condo
7. Condo Exemption
8. Appeals

- Workflow process steps for each service?
- Which staff are involved in each process step?
- How much time is spent on each process step?
- Volume of cases for each service?
- How is case load distributed between staff?

Joint Applications (x9)

- What is the process step overlap when the workflows of the above services are combined?
- How do we avoid double-counting?

Activities Without Fee

Critical for Development Applications

Pre-consultations

General Inquiries

Administrative

Policy

Municipal Projects

Relationship Management

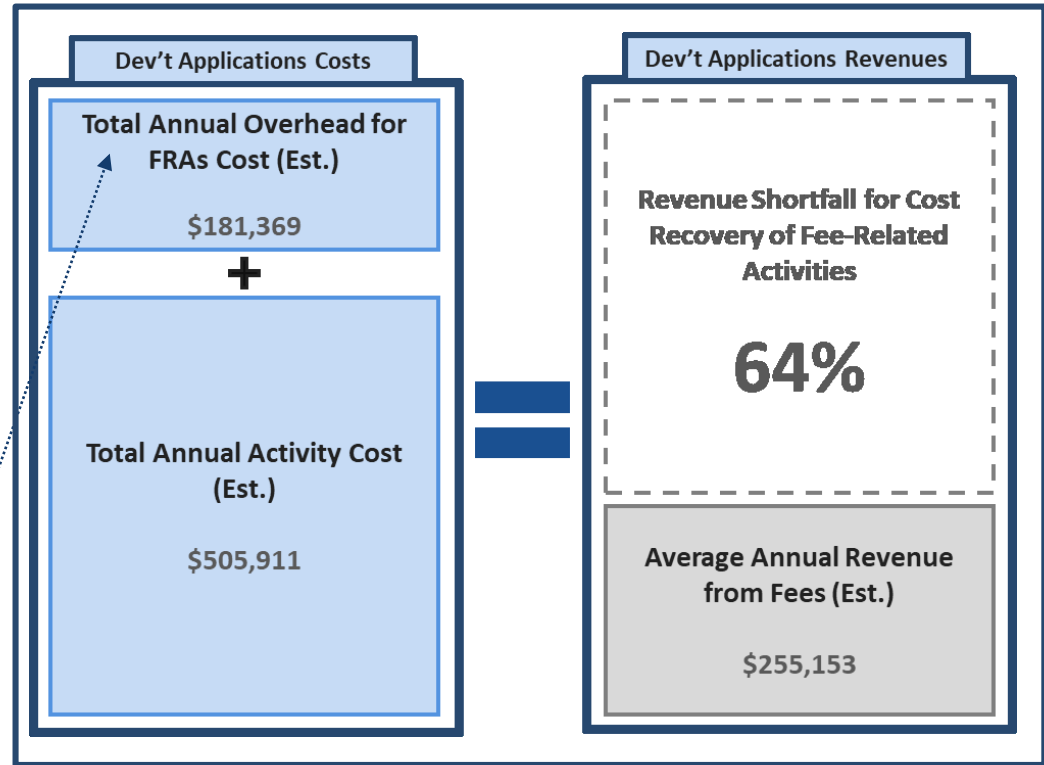
Urgency of Expected Response

- What are the activities involved in each category?
- What percentage of each staff's time is meant to be spent on each category, at each staff level?

Summary of our Review's Findings

Cost Recovery with Appropriate Overhead Attributed to Fee Related Activity

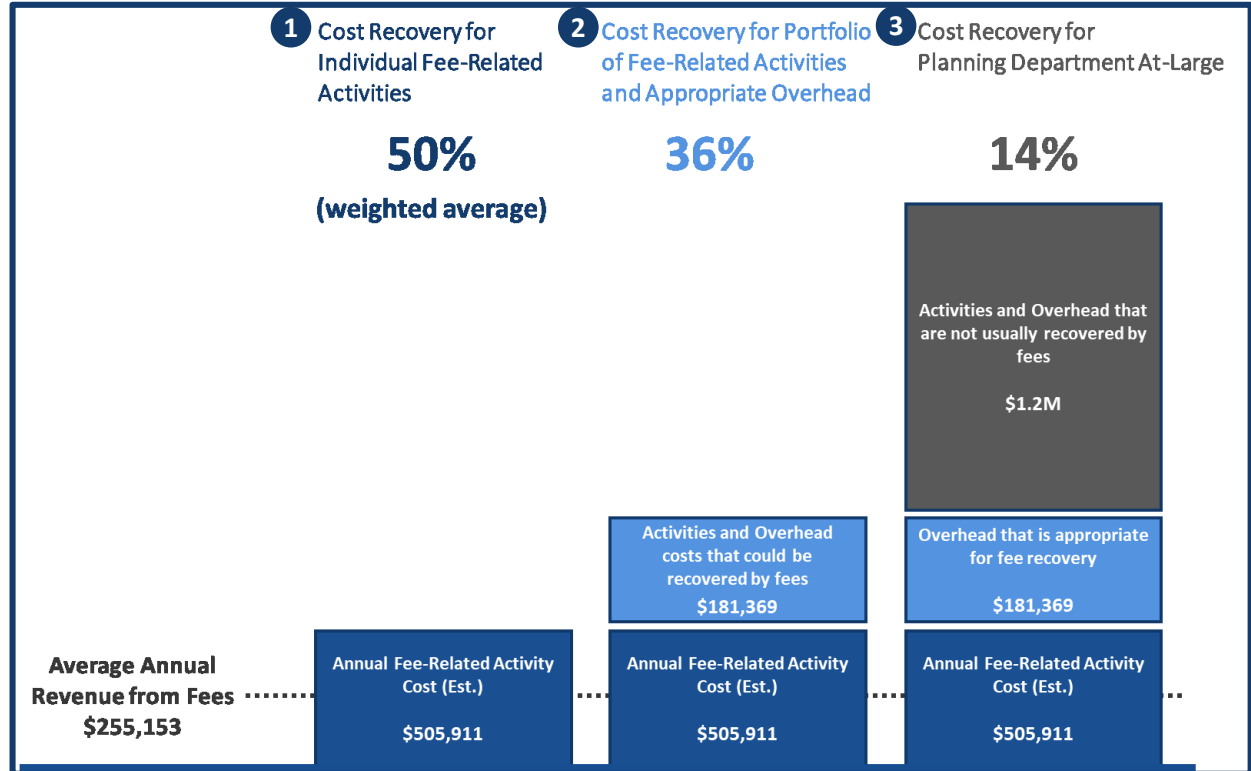
Overhead Category	2020 Dept Budget
GIS Staff (50%)	\$ 39,704
Administrative Support (10% of time allocated to FRAs)	\$ 5,364
ESRI (GIS)	\$ 63,000
Teranet (Parcel Data)	\$ 18,200
GeoCortex (Online GIS)	\$ 6,500
CityWorks (Application Processing)	\$ 21,060
Application and site visit related mileage	\$ 13,600
Postage for notices relating to development (90%)	\$ 13,942
Total Overhead for Fee-Related Activities	\$ 181,369



Overall Summary of Cost Recovery Findings: Three Perspectives

In this section of our report, we examine cost recovery from three different perspectives:

- 1** The first model calculates fees with reference to only the direct Activity Costs directly attributable to providing the serve
- 2** The second model calculates fees by adding to this an appropriate attribution of departmental overhead to the direct costs.
- 3** The third model is a simple calculation of percentage recovery by taking total planning department costs and comparing it as a percentage of total revenue.



Summary of Findings: Internal Review of Service Delivery Cost

Internal Perspective on Cost of Service Delivery: Our study of the internal costs of the land use planning service delivery of Bruce County shows cost recovery from three different perspectives:

- 50% cost recovery from fees with reference to only the direct Activity Costs directly attributable to providing the serve.
- 36% cost recovery from fees, by adding an appropriate attribution of departmental overhead to the direct costs.
- 14% cost recovery from fees by taking into account the total planning land use division costs and comparing it as a percentage of total revenue.

Provincial regulation's timeline limitation crowds staff with development reviews: The increased case volume of development applications that are bounded by the Province's regulatory timeline limitations set out, steer staff to prioritize workload of development applications processing review for both the County and particularly for Local Municipalities, over policy. The legislated timeframes for processing development applications for Local Municipalities create a constrain of staff workload flexibility.

Less resources for long-range policy review: The aforementioned constraint has led to the additional time required for the Department to fulfil its policy mandates first for the development of the updated County Official Plan and then for the updates of Local Official Plans. The budget and staff utilization capacity constraint creates challenging conditions for staff to achieve their target non-fee-related activities, such as: affordable housing policies, municipal projects, continuous process improvement, community improvement plans and other factors that affect Bruce County's development market conditions structurally over the long run.

Summary of Findings: External Review of Comparable Counties

External Perspective on Comparable Counties: Our research of comparable Counties shows that Bruce's development application fees are **below** the peer group's average – **in some cases the lowest**. Some of the comparable Counties have additional fees for segments of activities that are bundled in one fee for Bruce. In other cases, some comparable Counties charge a scaling fee for services that can require a wide range of activity by staff and charge a deposit for appeals or peer reviewed studies.

Summary of Findings: External Survey of Stakeholders

Significance of application fees to overall development costs: Almost all respondents, with the exception of one, explained that development application fees are between 1-2% of the overall development project total costs.

Geographic range of respondents' development experience: All of the survey's respondents identified that they have experience with development applications in other upper tier municipalities, beyond Bruce, such as: Grey, Perth, Wellington, Lambton, Huron, Owen Sound, and Regions of Peel and Durham. This validates their perspective and their perception from a comparative lens, when evaluation their experience with Bruce County's Land Use Planning Department.

Experience with Bruce County's Application Processing: The majority of the survey respondents commended Bruce County's department for their service experience. In some cases, it was acknowledged that some processes are more complex at Bruce than in other Counties, or that they take more time. One respondent speculated that the Department might be understaffed. One of the respondents provided negative feedback about their experience with Bruce, whereas another one expressed that they wished all their development projects were with Bruce because of their very pleasant experience.

Perception of Bruce County's fees vs. other Counties: On balance, the respondents perceive Bruce's fees to be either lower or comparable with some of the lower fee Counties that they conduct development activity in.

Fee Schedules for Cost Under-Recovery Correction

Alternative Fee Schedules for Full Cost Recovery

	Current Schedule of Base Fee	Fees for 100% Recovery of Activity	Fees for 100% Recovery of Activity + Overhead
Minor Variances	\$ 620	\$ 1,766	\$ 2,159
Consent	\$ 960	\$ 1,718	\$ 2,327
ZBA	\$ 1,030	\$ 2,262	\$ 2,915
Local OP Amendment	\$ 850	\$ 2,639	\$ 3,178
County OP Amendment	\$ 1,270	\$ 2,576	\$ 3,381
Subdivision/Condo (average)	\$ 6,395	\$ 6,484	\$ 10,539
Condo Exemption	\$ 1,270	\$ 1,574	\$ 2,379
COPA + ZBA	\$ 1,960	\$ 3,816	\$ 5,059
Consent + ZBA	\$ 1,990	\$ 3,310	\$ 4,572
Variances + Consent	\$ 1,580	\$ 2,636	\$ 3,638
LOPA + COPA	\$ 2,120	\$ 4,877	\$ 4,877
COPA + Consent	\$ 2,230	\$ 3,641	\$ 5,055
COPA + Variance + Consent	\$ 2,640	\$ 4,445	\$ 6,119
COPA + Zoning + Consent	\$ 2,920	\$ 4,859	\$ 6,711
LOPA + COPA + ZBA	\$ 2,810	\$ 5,467	\$ 7,249
LOPA + COPA + ZBA + Consent	\$ 3,770	\$ 6,664	\$ 9,055

Financial Impact of Alternative Fee Schedules for Full Cost Recovery

	Fees for 100% Recovery of Activity	Fees for 100% Recovery of Activity + Appropriate Overhead
Relief on Tax Base (Reduced Subsidy in \$)	\$ 249,252	\$ 430,621
Relief on Tax Base (Reduced Subsidy as % of tax rate)	0.5%	0.88%
Reduced Subsidies by Tax Base (% of Levy for Planning Dept)	14%	24%

New Fee Introductions for Full Cost Recovery

General Inquiries	\$ 50 for non-property owners
Pre-Consultations	\$ 200
Studies	\$40/hour for every additional hour required beyond 5 hours of study time
Pit/Quarry COPA	Minor/Small-scale Pit or Quarry COPA: \$21,730 Complex Pit or Quarry COPA: \$52,530

Financial Impact of New Fee Introductions for Full Cost Recovery

Relief on Tax Base (Reduced Subsidy in \$)	\$15,000-20,000 (approximation)
Relief on Tax Base (Reduced Subsidy as % of Tax Rate)	0.04%
Reduced Subsidies by Tax Base (% of Levy for Planning Dept)	1%

Recommendations

Decision Making for User Fees

- Development Application Fees are intended to assess costs directly to the benefiting party, while eliminating or minimizing the burden on the property tax base for the parties that do not benefit directly from the service. In many municipal and land use planning contexts, there is a frequent saying: *“Development should pay for development”*.
- The degree to which this saying is manifested in each municipality is a decision of Council. Influencing factors for this decision are usually the extent to which Bruce County’s fees vary from other comparable municipalities, the fiscal priorities of Council, the pressures on the tax base and the operating budget of the municipality at large, along with the perception of the County’s reception to development activity by external stakeholders with commercial interests.

Recommendation 1: Fee Convergence to Cost Recovery

- We recommend that the County converges its base fee schedule (first application) between the two alternatives aforementioned in Section 8.2. The sooner the adjustment is made, the faster the relief on the tax base will be and the significant under-recovery of costs will end.
- While the fee corrections to the chronic cost under-recovery required to converge to full cost recovery of activities plus appropriate overhead might seem large, it is important to recognize that Bruce County's Planning Fees have been held far below the average of its peer group – in many cases they are the lowest. Therefore, fee corrections are justified not only as a relief to the tax base, but also as being in alignment with the common practices of comparable upper tier municipalities.

Should the County decide to implement these recommendations, it is estimated that it can yield savings that are equivalent to 0.88 of one percent point of the tax rate, or 24 percent of the Planning Department's levy.

Recommendation 2: Fee Structure Amendments

- **Minor Variance:** Our process mapping and activity cost measurements indicate that the processing of such applications is easily scalable. Our recommendation is to consider amending the fee schedule in a way that allows for a flat fee for 1-2 minor variances in the same application and adds to it a separate flat fee that is 30% higher than the former for cases of 3 or more minor variances in the same application. A comparable case is Huron County.
- **Consents:** For multiple consents, we recommend reducing the price of each additional lot in the same application to 50%, post the first one. Our process mapping and activity cost measurements indicate that the processing of such applications is easily scalable. This is to be considered in more detail by the staff, as there have been discussions that indicate that often this route is opted for instead of Plan of Subdivision. A comparable case is Oxford County.
- **COPA:** Our recommendation is to segment fees for Major COPA and Minor COPA, based on whether it requires more than 3 technical studies or not. For Major COPAs, we recommend increasing the new base fee (of full cost recovery) by 8% for each additional technical study required over the threshold of 3 studies. A comparable case is Grey County.

Greater transparency in setting fees is not just about ensuring the fees fully reflect existing gaps in the full cost price. It should also recognize “bulk rate” savings that come from economies of scale in multi-unit applications, to the benefit of the developer-user. Passing on the savings of economies of scale will accurately reflect actual costs, to the benefit of both the County and the user.

Recommendation 3: Introduction of New Fees

- An introduction of new fees does not have a significant financial impact on the operating budget – instead, it is meant to be applied to less frequent cases of activity surge for specific requests. Cases we identified: Studies over 5 staff hours, and General Inquiries by non-residents of Bruce County (ie. those that do not contribute to the tax base).
- In addition, we identified that Pre-Consultations could take a significant amount of time, prior to a submitted application. In line with the practice of some other upper tier municipalities, we recommend a fee introduction for Pre-Consultations.
- Our recommended four Fee Introductions:
 - **General Inquiries:** \$50 for non-property owners
 - **Pre-Consultations:** \$200
 - **Studies:** \$40/hour for time over a 5-hour threshold
 - **Pit/Quarry COPA:**
 - **Minor/Small-scale Pit or Quarry COPA:** \$21,730
 - **Complex Pit or Quarry COPA:** \$52,530

An introduction of new fees transfers the burden of paying for the service from the taxpayer to the benefitting user equivalent to 0.07 percentage points of the tax rate, or 1.0 percentage point of the Planning Department's levy.

Recommendation 4: Introduction of Deposit for Peer Reviews

- We recommend the consideration of introducing a deposit fee that could be used to recover the costs for peer review of studies, when required as part of the application. This will prevent invoicing and payment delays that could impede the timeline of service delivery, while the application process is already undertaken.
- Applicants should be responsible for the full costs of undertaking peer reviews for any studies or drawings submitted in support of the application. These costs can also include a 10% administration fee for the Planning Department to recover the contract management costs.
- Comparable cases are Grey County, Oxford County and Wellington County. At Grey County, a \$5,000 deposit is used for Peer Reviews - \$500 of the deposit is non-refundable if the application is withdrawn prior or during the approval process.

An introduction of Deposits and a 10% Administration Fee would reduce the administrative pressure on whether a peer review is required or not, along with the resource constraints of managing such a contract. While the financial impact of this measure is small in monetary value, it can make a meaningful difference in the efficiency and speed of processing complex applications.

Recommendation 5: Phase-in of Fee Corrections for Cost Recovery

- To mitigate the impact on moving to full cost pricing on the user, implementation of the increase could be phased in over time.
- We modelled the following approaches to phase-ins (see Report Section 7.2; Tables 18, 19 and 20):
 - 3- and 5-year horizons
- In the table on slide 25, we show what the annual fee correction would have to be for each type of application, over each respective time horizon, in order to eventually reach full cost recovery.
- Huron County was in a similar situation in 2012, when Council decided to spread the lump sum of fee corrections over 5 years. Post the 5-year period, Huron continued to increase its fees annually by the CPI rate, to ensure long-term cost recovery.

A phasing of fee corrections would cushion the impact of increases on users but would also delay the move to full cost pricing for the service, meaning that it would continue to be subsidized by the taxpayer through the levy.

Recommendation 5: Phase-in of Fee Corrections for Cost Recovery

	One Time Correction of Cost Under-Recovery (Full Cost Recovery by 2023)	Annual Correction of Cost Under-Recovery Over 3 Years (Full Cost Recovery by 2023)	Annual Correction of Cost Under-Recovery Over 5 Years (Full Cost Recovery by 2025)
Minor Variances	\$ 1,539	\$ 513	\$ 308
Consent	\$ 1,367	\$ 456	\$ 273
ZBA	\$ 1,885	\$ 628	\$ 377
Local OP Amendment	\$ 2,328	\$ 776	\$ 466
County OP Amendment	\$ 2,111	\$ 704	\$ 422
Subdivision/Condo (average)	\$ 4,144	\$ 1,381	\$ 829
Condo Exemption	\$ 1,109	\$ 370	\$ 222
COPA + ZBA	\$ 3,099	\$ 1,033	\$ 620
Consent + ZBA	\$ 2,582	\$ 861	\$ 516
Variances + Consent	\$ 2,058	\$ 686	\$ 412
LOPA + COPA	\$ 2,757	\$ 919	\$ 551
COPA + Consent	\$ 2,825	\$ 942	\$ 565
COPA + Variance + Consent	\$ 3,479	\$ 1,160	\$ 696
COPA + Zoning + Consent	\$ 3,791	\$ 1,264	\$ 758
LOPA + COPA + ZBA	\$ 4,439	\$ 1,480	\$ 888
LOPA + COPA + ZBA + Consent	\$ 5,285	\$ 1,762	\$ 1,057

Recommendation 6: Continue Annual Corrections by CPI Rate, Post Major Adjustments

- Based on current practice of increasing fees annually by CPI, we recommend that the County resumes its application of annual CPI increases, after fees have been increased to the level of full cost recovery. For example:
 - If the County chooses to adjust its fees to full cost recovery in 2021, the annual CPI increases would apply from 2022 onwards;
 - If the County chooses to adjust its fees to full cost recovery gradually over 3 years by 2023, the annual CPI increases would apply from 2024 onwards;
 - If the County chooses to adjust its fees to full cost recovery gradually over 5 years by 2025, the annual CPI increases would apply from 2026 onwards;
- This is a common practice in municipal administration – both Bruce and other comparable Counties have applied this practice.
- Bruce County's Bylaw for Fees and Charges should be updated accordingly.

The continuation of applying annual CPI increases will ensure that the County is set on a path for long-term cost recovery by user fees for its planning service delivery.



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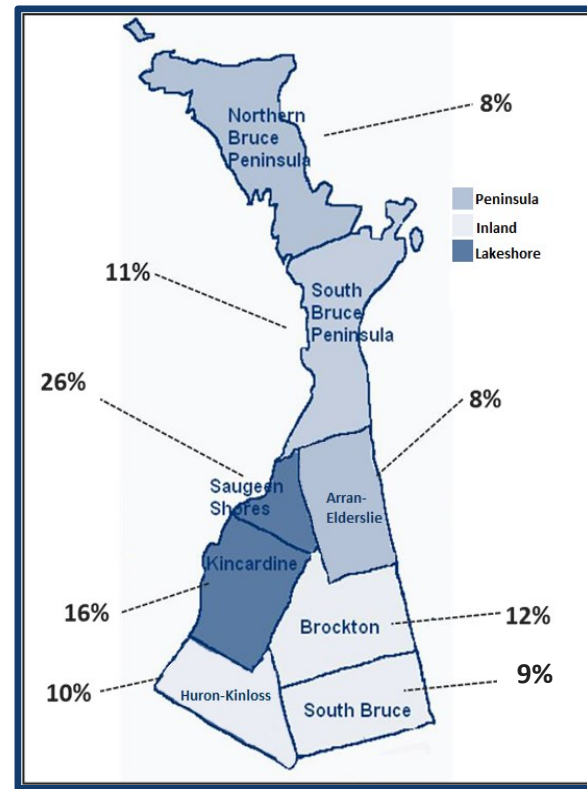
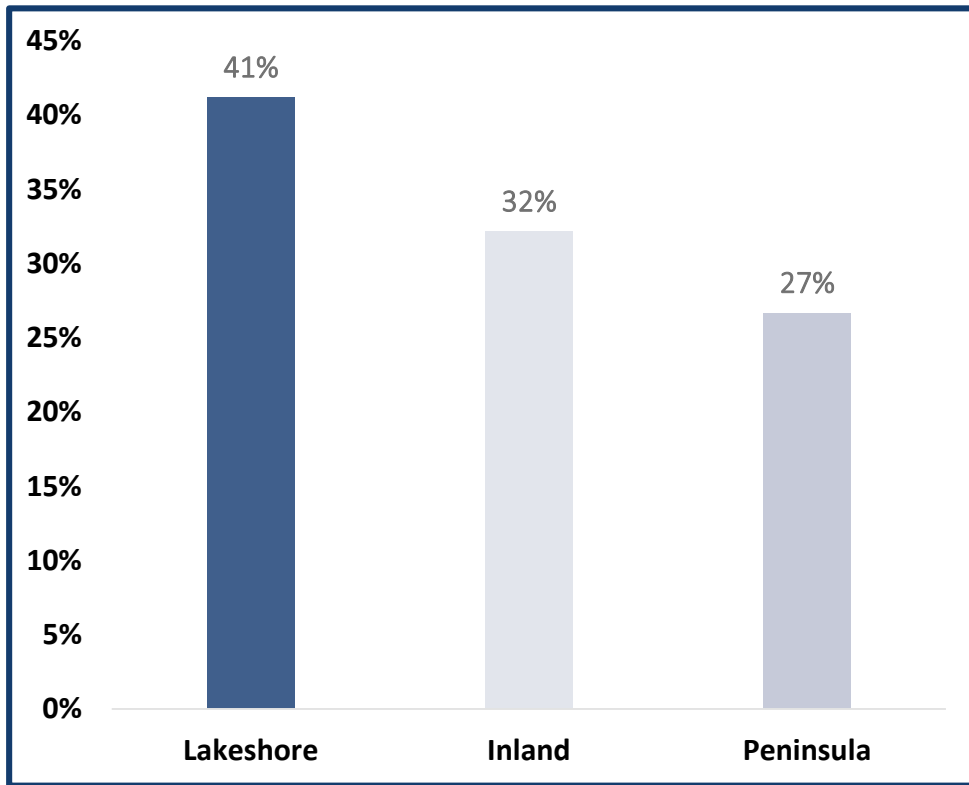
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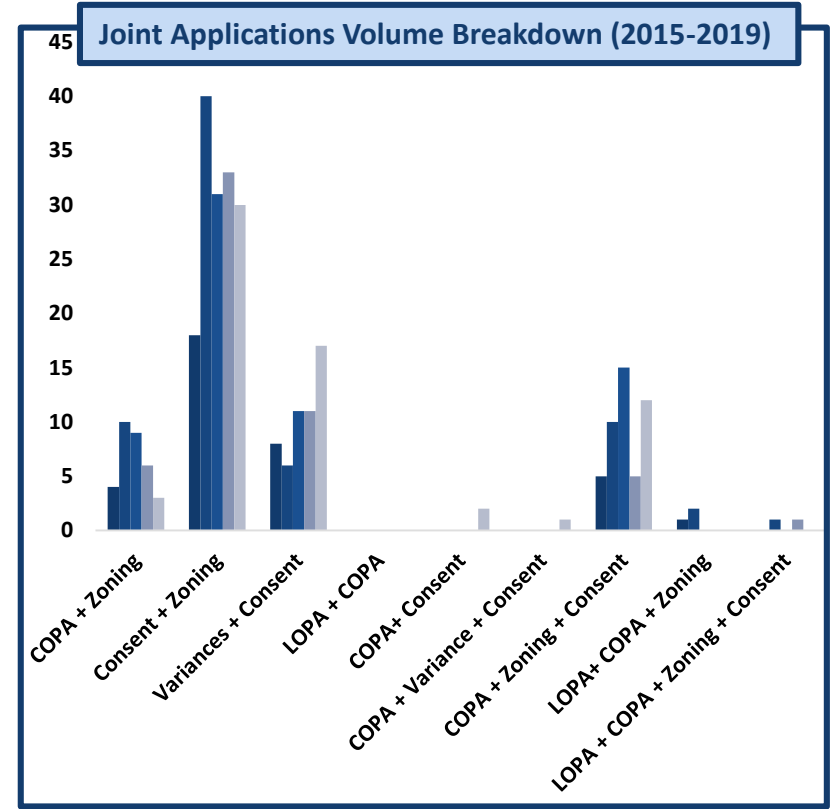
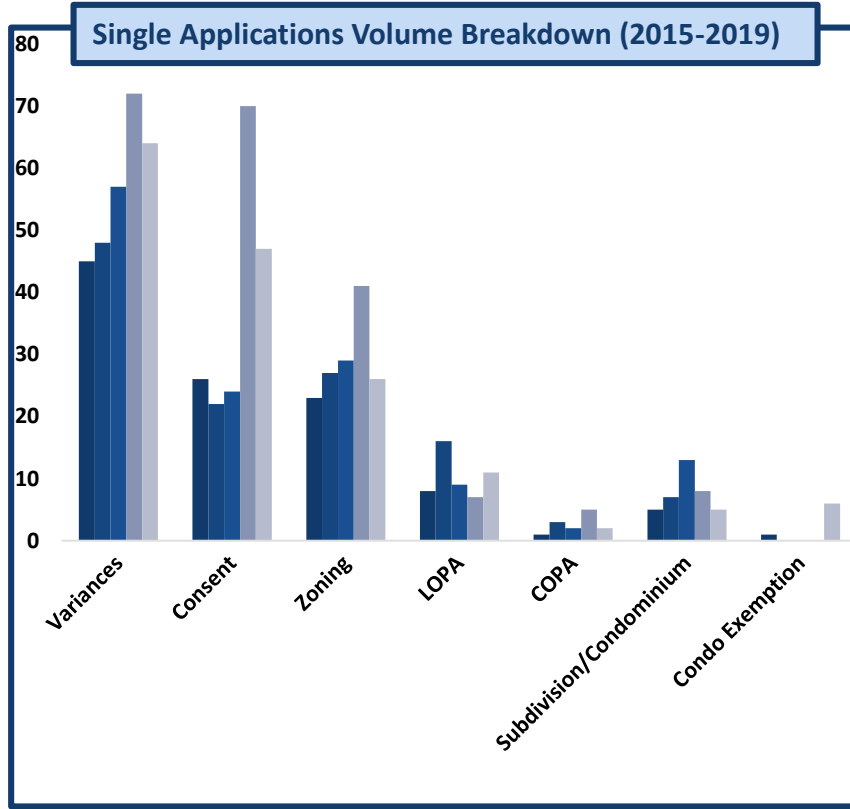
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Appendix A: Internal Perspective on Service Delivery Costs

Case Volume Breakdown: By Hub/Municipality



Case Volume Breakdown: By Application Type



■ 2015 ■ 2016 ■ 2017 ■ 2018 ■ 2019

Activity-Based Cost Summary per Application Type

Single Applications	Activity-Based Cost
Variances	\$ 1,766
Consent	\$ 1,718
Zoning	\$ 2,262
LOPA	\$ 2,639
COPA	\$ 2,576
Subdivision/Condominium (average)	\$ 5,154
Condo Exemption	\$ 1,140
Appeals	\$ 4,315
Joint Applications	Activity-Based Cost
COPA + Zoning	\$ 3,816
Consent + Zoning	\$ 3,310
Variances + Consent	\$ 2,636
LOPA + COPA	\$ 4,877
COPA + Consent	\$ 3,641
COPA + Variance + Consent	\$ 4,445
COPA + Zoning + Consent	\$ 4,859
LOPA + COPA + Zoning	\$ 5,467
LOPA + COPA + Zoning + Consent	\$ 6,664

Activity-Based Cost Recovery per Single Application Type

	A	B	C	D
	County Fee Collected	Actual Cost based Activity Costing	Shortfall in Fee Relative to Actual Cost	Activity Cost Recovery
Variances	\$ 620	\$ 1,766	-\$ 1,146	35%
Consent	\$ 960	\$ 1,718	-\$ 758	56%
Zoning	\$ 1,030	\$ 2,262	-\$ 1,232	46%
LOPA	\$ 850	\$ 2,639	-\$ 1,789	32%
COPA	\$ 1,270	\$ 2,576	-\$ 1,306	49%
Subdivision/Condo	\$ 5,120	\$ 5,154	-\$ 34	99%
Condo Exemption	\$ 1,270	\$ 1,140	\$ 130	111%

Activity-Based Cost Recovery per Joint Application Type

	A	B	C	D
	County Fee Collected	Actual Cost based on Activity Costing	Shortfall in Fee Relative to Actual Cost	Activity Cost Recovery
COPA + Zoning	\$ 1,960	\$ 3,816	-\$ 1,856	51%
Consent + Zoning	\$ 1,990	\$ 3,310	-\$ 1,320	60%
Variances + Consent	\$ 1,580	\$ 2,636	-\$ 1,056	60%
LOPA + COPA	\$ 2,120	\$ 4,877	-\$ 2,757	43%
COPA + Consent	\$ 2,230	\$ 3,641	-\$ 1,411	61%
COPA + Variance + Consent	\$ 2,640	\$ 4,445	-\$ 1,805	59%
COPA + Zoning + Consent	\$ 2,920	\$ 4,859	-\$ 1,939	60%
LOPA + COPA + Zoning	\$ 2,810	\$ 5,467	-\$ 2,657	51%
LOPA + COPA + Zoning + Consent	\$ 3,770	\$ 6,664	-\$ 2,894	57%

Appendix B: Comparable Counties

Comparator Counties

	Bruce County	Grey County	Huron County	Oxford County	Simcoe County	Wellington County
Population	66,491	93,830	59,297	110,862	305,516	90,932
Area (km2)	4,079	4,513	3,397	2,040	4,841	2,573
Average House Price (2019)	\$ 365,698	\$ 365,700	\$ 378,555	\$ 406,469	\$ 390,701*	\$ 543,974*
Annual App Volume	450+	55	235	450	~ 2,000	142
Average Overall Cost Recovery from Fees	14%	18%	17%	11%	4%	25%

Appendix C: Summary of Findings by Application Type

Minor Variances

- **Current County Fee:** \$620
- **Current Activity Cost Recovery:** 35%
- **Frequency of Application:** 57 per year, on average
- **Fee Comparison to Peer Group:**
 - **Applicable Peer Group Fee Average:** \$1,213
 - **Insight:** Bruce's fees for Variance are among the lowest and 49% lower than the average fee of the comparable peer group. Additionally, they do not capture the cost efficiencies of multiple minor variances in one application in their pricing. A higher fee would benefit the municipality's cost recovery and a flexible pricing for multiple minor variances would benefit the applicants.

Consents

- **Current County Fee:** \$1,330
- **Current Activity Cost Recovery:** 56%
- **Frequency of Application:** 38 per year, on average
- **Fee Comparison to Peer Group:**
 - **Applicable Peer Group Fee Average:** \$2,454
 - **Insight:** Bruce's fees for Variance are the lowest. Bruce's fees for Consents are 46% lower than the average of the comparable Counties peer group.

Zoning By-law Amendments

- **Current County Fee:** \$1,400
- **Current Activity Cost Recovery:** 46%
- **Frequency of Application:** 29 per year, on average
- **Fee Comparison to Peer Group:**
 - **Applicable Peer Group Fee Average:** \$3,052
 - **Insight:** Bruce's fees for Zoning By-law Amendments are the lowest. They are 54% lower than the average of the comparable Counties peer group. In addition, we note that Huron County has a distinct fee for Renewal of Temporary Use Zoning By-law.

Local Official Plan Amendments

- **Current County Fee:** \$1,270
- **Current Activity Cost Recovery:** 32%
- **Frequency of Application:** 10 per year, on average
- **Fee Comparison to Peer Group:**
 - **Applicable Peer Group Fee Average:** \$2,792
 - **Insight:** Bruce's fees for Local Official Plan Amendments are the lowest. They are 54% lower than the average of the comparable Counties peer group.

County Official Plan Amendments

- **Current County Fee:** \$1,270
- **Current Activity Cost Recovery:** 49%
- **Frequency of Application:** 3 per year, on average
- **Fee Comparison to Peer Group:**
 - **Applicable Peer Group Fee Average:** \$3,084
 - **Insight:** Bruce's fees for Local Official Plan Amendments are the lowest. They are 59% lower than the average of the comparable Counties peer group.

Subdivisions and Condominiums

- **Current County Fee (average):** \$6,400
- **Current Activity Cost Recovery:** 99%
- **Frequency of Application:** 8 per year, on average
- **Fee Comparison to Peer Group:**
 - **Applicable Peer Group Fee Average:** \$6,679 (comparing only base fees)
 - **Insight:** Bruce County's starting fee for Subdivision/Condominium Draft is 4% lower than the average of the comparable Counties peer group. While the base fee is among the lowest in the peer group, as the variable fee portion of it is added for incremental blocks/lots/units, it begins converging towards the average of its comparable Counties.

Condominium Exemptions

- **Current County Fee:** \$1,330
- **Current Activity Cost Recovery:** 81%
- **Frequency of Application:** 1 per year, on average
- **Fee Comparison to Peer Group:**
 - **Applicable Peer Group Fee Average:** \$1,156
 - **Insight:** Bruce County's fees for Condo Exemptions are 15% higher than the average of the comparable Counties peer group. This explains the high cost recovery exhibited for this infrequent type of applications.

Appeals

- **Current County Fee:** no fee
- **Current Activity Cost Recovery:** 0%
- **Frequency of Application:** 3 per year, on average
- **Fee Comparison to Peer Group:** Bruce County currently has neither a fee nor a deposit incorporate in its fee schedule for Appeals. While an infrequent case, it is a resource consuming one when it occurs.

COPA + ZBA

- **Current Activity Cost Recovery:** 51%
- **Frequency of Application:** 6 per year, on average

Consent + ZBA

- **Current Activity Cost Recovery:** 60%
- **Frequency of Application:** 30 per year, on average

Minor Variances + Consents

- **Current Activity Cost Recovery:** 60%
- **Frequency of Application:** 11 per year, on average

LOPA + COPA

- **Current Activity Cost Recovery:** 43%
- **Frequency of Application:** 0.2 per year, on average

COPA + Consents

- **Current Activity Cost Recovery:** 61%
- **Frequency of Application:** 0.4 per year, on average

COPA + Minor Variances + Consents

- **Current Activity Cost Recovery:** 59%
- **Frequency of Application:** 0.2 per year, on average

COPA + ZBA + Consents

- **Current Activity Cost Recovery:** 60%
- **Frequency of Application:** 9 per year, on average

LOPA + COPA + ZBA

- **Current Activity Cost Recovery:** 51%
- **Frequency of Application:** 1 per year, on average

LOPA + COPA + ZBA + Consents

- **Current Activity Cost Recovery:** 57%
- **Frequency of Application:** 0.4 per year, on average