



URBAN DEVELOPMENT INSTITUTE- OKANAGAN CHAPTER

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City of West Kelowna
2760 Cameron Rd
West Kelowna, BC, V1Z 2T6

Attention: Mark Koch, Stirling Scory

Subject: Fees and Charges Bylaw

Dear Mark and Stirling:

Thank you for providing UDI Okanagan with the opportunity to provide further input on the City of West Kelowna's Fees and Charges Bylaw.

In reviewing the revised proposed changes to the bylaw, we are pleased that some of our initial suggestions have been taken into consideration. We offer the following further feedback on the revised proposed bylaw.

- **Schedule 2 Building Permit Fees:**
 - It states that there will be a non-refundable application fee similar to the previous \$200 and \$500 deposits, but they will no longer be credited on the permit at issuance, with the exception of projects with high permit values.
 - UDI Okanagan suggests that all application fees be refundable, not only those of projects with high permit values.
 - We fully support the City's proposed change to include a reference to the existing section of the Building Bylaw (S.9.8) which allows for up to a 10% reduction in permit fees that include engineering and a coordinating professional.
- **Schedule 3 Subdivision Development Engineering and Approving Officer Fees:**
 - The proposed increased engineering fee for developments from 1.8% of onsite works to 3% appears as though it could be excessive. UDI Okanagan requests further justification for this fee increase.
 - There is an item called 'Development (excluding asphalt and concrete)' that includes a 1.8% onsite and/or 3% offsite works charge with a note that the exclusion only applies to the 1.8% of onsite works.
 - UDI Okanagan believes that this should not apply to strata developments and suggests including language within the bylaw to reference this. This relates to a larger issue that UDI Okanagan would

like to discuss with the City of West Kelowna at a future liaison committee meeting.

- **Schedule 5 Development Services Fees:**
 - The Development Variance Permit fees have been separated into two categories (1 to 2 variances, and 3 or more variances) with the intent of limiting the number of variances requested.
 - UDI Okanagan does not support the concept of penalizing applicants for having more than two variants by charging a higher fee once an applicant applies for 3 or more variances. There are various reasons why applicants request variances. It is very specific to each project and also influenced by the current bylaws that are in place. It is not uncommon for 3 or more variances to be requested for a given project. Development Variance Permit fees should be based on recovering costs and not attempting to limit how many variances are requested. For this reason, we recommend charging the same fee per variance regardless of the total amount of variances requested.
 - UDI Okanagan also suggests that the City of West Kelowna undergo a bylaw review in order to help reduce the number of variances needed in applications.
 - UDI Okanagan requests clarification on what the proposed additional fee is if an application reaches 3 or more variants.
 - **Additional Building Permit Fees:**
 - There is an item called 'subsequent re-inspection fee' which is double the previous re-inspection fee to a maximum re-inspection fee of \$1,000.
 - UDI Okanagan does not support the concept of a subsequent re-inspection fee that is larger than the initial inspection fee. This fee should focus on cost recovery and should not be used to penalize an applicant that may need to have a re-inspection.
 - There is an item called 'Non-standard building permit review or inspections'. UDI Okanagan would like to have a definition of what constitutes a non-standard building permit and suggests that this definition be inserted into the bylaw as well.
 - **Reductions and Refunds:**
 - There is an item called 'Permit cancellation or expiry after issuance (construction has not commenced)' that states that 75% of the cost of the permit fee will be refunded.
 - UDI Okanagan is not in support of this approach since the fee should ultimately be about cost recovery. UDI Okanagan believes that the costs contemplated exceed cost recovery and requests that the City provide some justification for keeping 25% of a permit fee upon cancellation of a project.

Thank you in advance for your consideration and we look forward to discussing these items mentioned further at our upcoming meeting.

Best Regards,

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Per: Rick Miller, Chair, City of West Kelowna Municipal Liaison Committee