



BMA
Management Consulting Inc.

Building Permit Fees Review

Municipality of Central Elgin – January 2026

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1 Executive Summary

1.1 Executive Summary – Municipality of Central Elgin Building Permit Fees Review

The Municipality of Central Elgin, in collaboration with BMA Management Consulting Inc., conducted a comprehensive review of building permit fees to ensure financial sustainability and compliance with the Ontario Building Code Act. The review assessed historical construction activity, operating expenditures, and the Building Reserve Fund to determine whether current fees adequately recover the full cost of service.

Key Findings:

- Construction activity averaged \$84 million annually from 2020–2025, with significant fluctuations and a recent increase in non-residential projects.
- The Building Reserve Fund balance is estimated at \$626,591 for 2025, representing 121% of annual operating costs—below the recommended target of 150%.
- Current fees do not fully recover costs, which include direct, indirect, and corporate support expenses totaling approximately \$511,000 annually in 2026.
- Benchmarking indicates Central Elgin’s proposed fees remain competitive with neighbouring municipalities.
- This review ensures that building permit fees are fair, equitable, and aligned with legislative requirements, supporting the long-term financial health of Central Elgin’s building services.

Methodology:

The study applied process mapping, time tracking, and activity-based costing to calculate fully burdened hourly rates for staff. A financial model was developed to determine fees based on actual service costs and average permit sizes. Peer municipality comparisons validated the proposed fee structure.

Recommendations:

- 1. Adopt the 2026 building permit fees outlined in Appendix A.**
- 2. Adjust fees annually based on the Consumer Price Index.**
- 3. Establish a Building Reserve Fund target of 150% of gross operating expenses to mitigate cyclical construction activity impacts.**

2 Introduction

2.1 Study Overview

The Municipality of Central Elgin engaged BMA Management Consulting Inc. to assist in conducting a comprehensive review of its building permit fees. The purpose of this review is to ensure that the Municipality's fees are fair, competitive, and reflective of the actual costs associated with processing building permit applications. This report outlines the process undertaken in the fee review and the recommendation to align fees with the actual cost of service using activity-based costing. With guidance from BMA Management Consulting inc., the findings support increased fee adjustments to ensure permit revenues reflect the true cost of services.

The purpose of the *Building Code* is to protect public health, safety and general welfare as it relates to the construction and occupancy of buildings and structures. Central Elgin's Building Department enforces the *Ontario Building Code* for new construction, renovations and related building services. As allowed under the *Ontario Building Code Act*, building permit fees are the sole source of revenue used to fund these services.

Leading practice research in Ontario suggests that municipalities should undertake a comprehensive review of building permit fees every four to five years to help ensure that the building permit fees keep pace with the cost of providing this service.

The purpose of this review was to:

- respond to increase service demands and complexity of permit applications
- reflect legislative and regulatory process changes
- evaluate the financial health of the Building Reserve fund
- develop a fee structure based on full cost recovery

2.2 Strategic Objectives

The following key strategic objectives were used to guide the development of the recommended planning fees:

- **Cost Recovery and Financial Sustainability** - Ensure that building permit fees reflect the actual cost of service delivery, including staff time, overhead, and indirect costs.
- **Transparency and Accountability** - Provide a clear rationale for fee structures, supported by activity-based costing and benchmarking.
- **Legislative Compliance** - Align fee recommendations with the requirements of the *Ontario Building Code Act*.
- **Equity and Fairness** - Ensure that fees are equitable across application types and do not create undue barriers to development.
- **Benchmarking and Best Practices** - Reflect insights from comparator municipalities to ensure fees are competitive, and defensible.

2.3 Methodology

This study included the following steps:

- Legislative review of Section 7 of the *Ontario Building Code Act* (OBC) evaluation of historical construction activity, revenue analysis of operating expenditures and departmental deficits assessment of the Building Reserve fund status and policy targets.
- Process mapping and time tracking of permit services activity-based costing to calculate staff hourly rates fee benchmarking with peer municipalities in Elgin County, Middlesex County and Oxford County.
- Review of construction activity.
- Analysis of the Building Reserve Fund.
- Process mapping and time estimates.
- Activity based accounting to calculate the full cost of building permit fees.
- Benchmark fees with other municipalities.
- Make recommendations on fee changes and updates.

2.4 Legislative Review

- The authority to charge for building permits is contained in Section 7 of the *OBC Act*.
- Under the Act municipalities are required to uphold three principles when setting building permit fees as shown in the table.

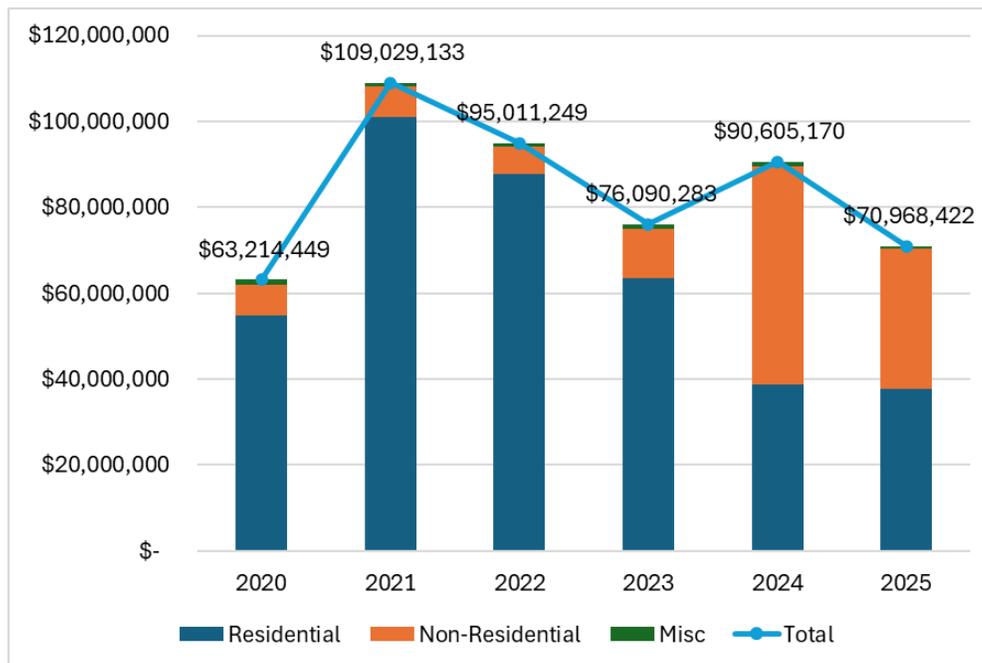
Fairness and Equity
<ul style="list-style-type: none">• Section 7(2) of the Act states that the amount of the fees must not exceed the anticipated reasonable costs of the municipality to administer and enforce the Act.• Municipalities are expected to calculate both the direct costs required to operate the building plans examination and inspection service and indirect costs related to all other municipal departments who provide support services to the building department.• Building permit fees can also include a component designated for a reserve fund.
Accountability
<ul style="list-style-type: none">• Section 7(4) of the Act requires that municipality's prepare annual public reports that disclose the revenue, operating costs and Reserve balances.
Transparency
<ul style="list-style-type: none">• Public notice must precede any fee adjustments or new fee proposals at least 21 days.

3 Financial Review and Historical Trend Analysis

3.1 Construction Activity Trends

- Prior to undertaking a review of the building permit fees, it is necessary to gain an understanding of the trends in terms of total construction activity, type of construction activity and associated permit fee revenues and expenditures.
- Trends in construction activity are important to understand as these trends have an impact on the financial position of the Building Permit & Inspection Services Department.
- Figure 1 reflects the construction value by type of application for the 5-year period from 2020 to 2025.

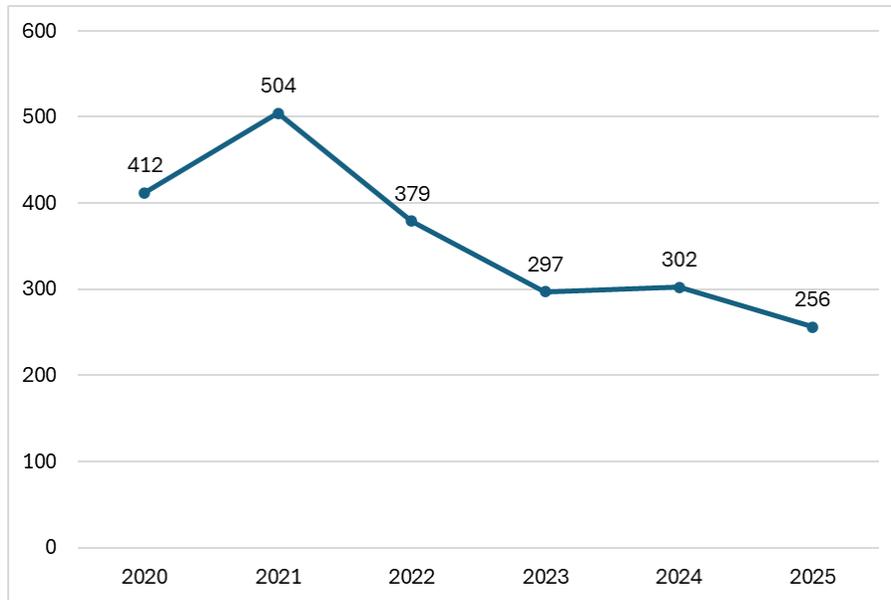
Figure 1 - Construction Value (000\$) by Type of Application (2020-2025)



- The value of total construction activity peaked in 2021 to approximately \$109 million, with a decline since that time, however activity varies from year to year. The average annual construction value from 2020 to 2025 was approximately \$84 million.
- The annual average of construction activity is 75% residential and 24% non-residential over the past 6 years. In 2024 there was a significant increase in non-residential’s proportion of construction at 56% of the total.

3.2 Number of Building Permit Trends

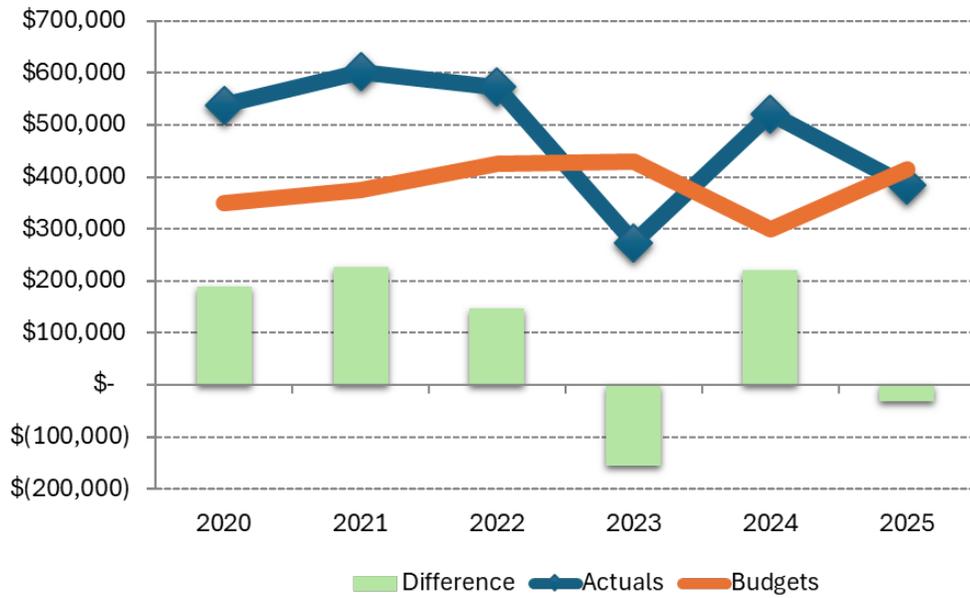
Figure 2 - Number of Permits (2020-2025)



Type	Number of Permits					
	2020	2021	2022	2023	2024	2025
Residential	223	291	182	129	134	141
Deck	48	40	35	35	19	28
Accessory	33	59	34	19	29	17
Pools	28	29	27	23	17	18
Plumbing	17	12	11	8	16	4
Septic	31	28	25	25	23	13
Assembly	2	5	9	5	2	3
Institution	2	0	1	1	2	0
Business & Office	1	1	1	1	0	1
Mercantile	3	2	6	5	5	2
Industrial	3	4	6	5	3	4
Farm	5	15	10	13	13	5
Solar	0	1	15	5	2	0
Demolition	16	17	17	23	37	20
Total	412	504	379	297	302	256

- As shown in figure 2, the total number of building permits has declined since 2021 from a high of 504 to 256 in 2025. This impacts the amount of revenue recovered. With different fees by type of application (e.g. residential vs. other classifications such as Industrial), there is not a direct correlation to the revenues generated. Furthermore, the number of permits includes new unit as well as renovations and additions.

Figure 3 - Fee Revenues Generated (2020-2025)

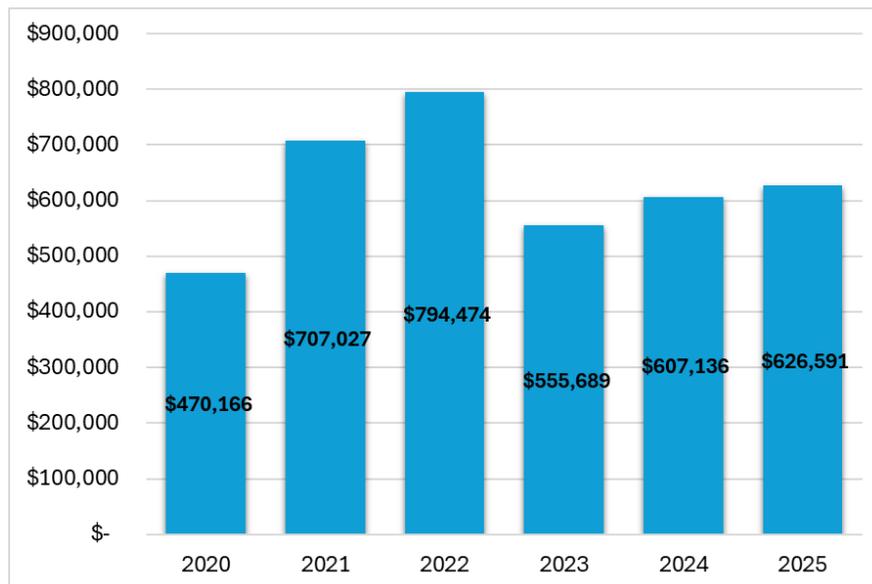


- Figure 3 reflects the budget fee revenues in relation to actual fee revenues generation.
- Except for 2023 and 2025, actual fee revenues exceeded the budget. This has allowed the Municipality to make contributions to the Reserve Fund in years where surplus revenues were achieved. The next section of the report provides an analysis of Reserve Funds.

3.3 Building Reserve Fund

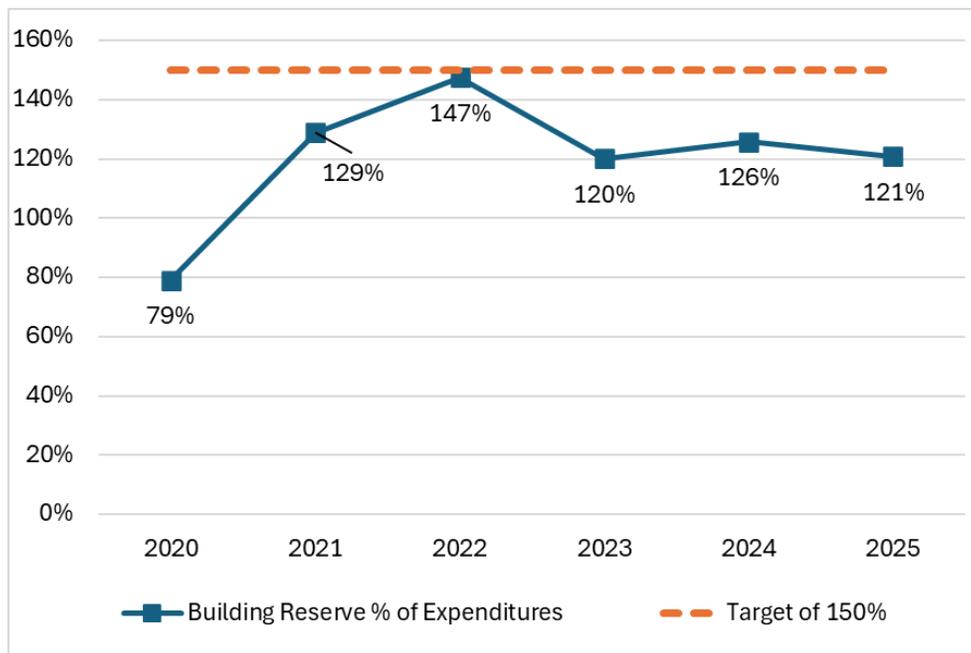
- The Central Elgin Building Department operates as an “Enterprise Model,” meaning that all costs associated with the enforcement of the Ontario *Building Code Act* are recovered from building permit fees.
- Optimally, under an Enterprise Model, revenues and expenditures are matched on an annual basis, however as shown previously construction activity is highly cyclical and building operations do not have sufficient elasticity to adjust operating expenditures to quickly align with the fluctuations in building activity. The Municipality is permitted under the *Building Code Act* to establish a Reserve Fund to smooth revenue volatility and ensure continuity of Building Code services.
- The Act does not specify a limit with respect to the size of the Reserve Fund, however, to ensure sufficient funds are available to spread the impact of a downturn in construction activity, a municipal best practice is to set an explicit target balance based on historical permit activity and projected service costs.
- Figure 4 shows the ending Building Reserve Fund balances from 2020 to the estimated 2025-year end balance. As shown in figure 4, there is a significant variation in the contributions and ending balances over this timeframe.

Figure 4 - Building Reserve Fund End Year Balance



- Based on the construction activity analysis as shown previously, it is recommended that Central Elgin set a **minimum reserve fund target of 150% of gross operating costs**.
- As shown in Figure 5, the estimated 2025 Building Reserve Fund balance is 121% of the annual gross expenditures, below the proposed target of 150%. The Reserve Fund using this metric has been trending down since 2022. This supports the need for an update the building permit fees and awareness of balances in relation to operating expenditures.

Figure 5 - Building Reserve Fund as a % of Operating Expenditures



4 Cost of Service Calculation

4.1 Building Permit Fee Calculation

Several steps were undertaken to determine the recommended costs of building permit fees:

- **Identify the full cost of service**
- **Process mapping and time estimates**
- **Calculate full burden hourly rates for each staff member**
- **Develop financial model to calculate fees**

4.2 Identify the Full Cost of Service

The Ontario Building Code Act stipulates that fees be designed to meet only the anticipated costs of processing building permits. Anticipated costs for 2026 include the following:

- **Direct Costs** include salary and benefits excluding estimated time spent on building related areas under the OBC and excludes any time and associated salaries and benefits that are attributed to By-law enforcement.
- **Indirect Costs** include time spent by Building Staff related to Building activities but not directly tie to an application but support the process as well as insurance, IT, accommodation and other ancillary expenses.
- **Corporate Support Costs** are derived from the budget and include such items as finance and human resources support costs. The 2026 Building Budget did not include these municipal wide support costs however they should be accounted for in calculating the full cost of service. This was calculated by allocating Corporate Costs to the Building based on their share of total expenditures. This is the recommended allocation methodology of the Ministry of Municipal Affairs and Housing (MMAH) guidelines for municipalities with populations of less than 100,000.

Figure 6 - 2026 Building Fee Budget

Building Allocation		
Expenditures	Budget 2026	Budget % of 2026
Direct Costs		
Salaries	\$ 231,697	45.3%
Benefits	\$ 78,354	15.3%
Indirect Costs		
Salaries	\$ 15,554	3.0%
Benefits	\$ 5,257	1.0%
IT	\$ 54,695	10.7%
Insurance	\$ 39,168	7.7%
Lease / Rent	\$ 10,727	2.1%
Misc Expenses	\$ 17,300	3.4%
Corporate Support	\$ 58,850	11.5%
Total	\$ 511,602	100%

- The combined total of costs recoverable from building permit fees is approximately \$511,602.

4.3 Reconciliation With Operating Budget

- The following table reconciles the 2026 Operating Budget with the costs included in the calculation of fees:

Figure 7 - 2026 Operating Budget and Differences to Fee Calculation

Building Permit & Inspection Services	2026 Operating Budget	Costs included in Calculation of Building Fees
EXPENSES		
Salaries	\$ 264,742	\$ 247,251
Benefits	\$ 88,582	\$ 83,611
Administrative Expense	\$ 400	\$ 400
Communications / Internet	\$ 2,000	\$ 2,000
Contracted Services	\$ 30,000	
Equipment Charges	\$ 2,400	\$ 2,400
Fuel & Transportation Costs	\$ 2,500	\$ 2,500
Insurance	\$ 39,168	\$ 39,168
IT Supplies, Equipment & Services	\$ 54,695	\$ 54,695
Lease / Rent	\$ 10,727	\$ 10,727
Materials & Supplies	\$ 1,500	\$ 1,500
Meetings, Conferences, Training	\$ 6,500	\$ 6,500
Program / Operating Expense	\$ 2,000	\$ 2,000
Corporate Cost Allocation		\$ 58,850
Total Expenses	\$ 505,214	\$ 511,602

- The cost included in the calculation of the building fees is different from the approved 2026 budget because of the following:
 - Salaries & Benefits related to the time CBO spends on By-law Enforcement have been eliminated as this is not an eligible building permit fee recoverable cost
 - Contracted Services in the amount of \$30,000 has been eliminated as it is a one-time expense
 - Corporate Support Cost in the amount of \$58,850 has been added to recover full cost of service

4.4 Process Mapping and Costing

- Municipal staff undertook a process mapping exercise for the various building permit classifications. The process maps identified:
 - each activity in the issuance and inspection of the building permit;
 - responsible staff role; and
 - average time to complete each activity.
- The process maps were used to calculate the anticipated cost of service. This is a reasonable and defensible approach to estimate the cost of service as they were prepared by experienced staff who understand service levels and processes unique to Central Elgin.

4.5 Activity Based Costing

- Activity based costing was used to assign a percentage of overhead and indirect costs of the department to each employee. The total employee cost was then divided by each employee's productive hours (total workable hours less non-productive activities such as vacation time, sick leave, statutory holidays, and staff training) to calculate the employees' fully burdened hourly rate.
- The fees are calculated by using the time estimates from the process maps for each of the staff members and multiplying their time by their fully burdened hourly rate.

4.6 Develop Financial Model

- A financial model was developed to calculate the fees for each type of building permit application. The hours identified in the process mapping exercise for each employee times the employees fully burden hourly rate was used to determine the total cost of the application. The total cost was then divided by the average floor area of a permit of that class to determine the square feet cost. The calculated recommended fees are attached in Appendix 'A'.

5 Summary of Fee Changes

5.1 Fee Changes Recommended

- **New Fees** - There are four new fees recommended based on work undertaken by the Municipality where fees are currently not recovered. These include the following:
 1. Designated Structures – Retaining Wall based on a cost per linear foot
 2. Signs Regulated by the Building Code
 3. Re-inspection after the 3rd inspection to recover costs associated with failing to meet the Building Code and to support fairness and equity of the costs associated with the additional work required.
 4. Change of Use to account for additional staff time required to process changes in the use of the permit
- **Change in Fee** - There are also some changes to the structure of the fees in the areas including:
 1. Eliminate many of the minimum charges to support fairness and equity for minor applications to lower the upfront costs for small projects. This supports housing affordability and also encourages applicants to obtain permits.
- **Reflect Full Cost of Service 2026** - Updated all fees using the 2026 Operating Budget attributed to Building

6 Benchmarking of Neighbouring Municipalities

6.1 Benchmarking of Building Permit Fees

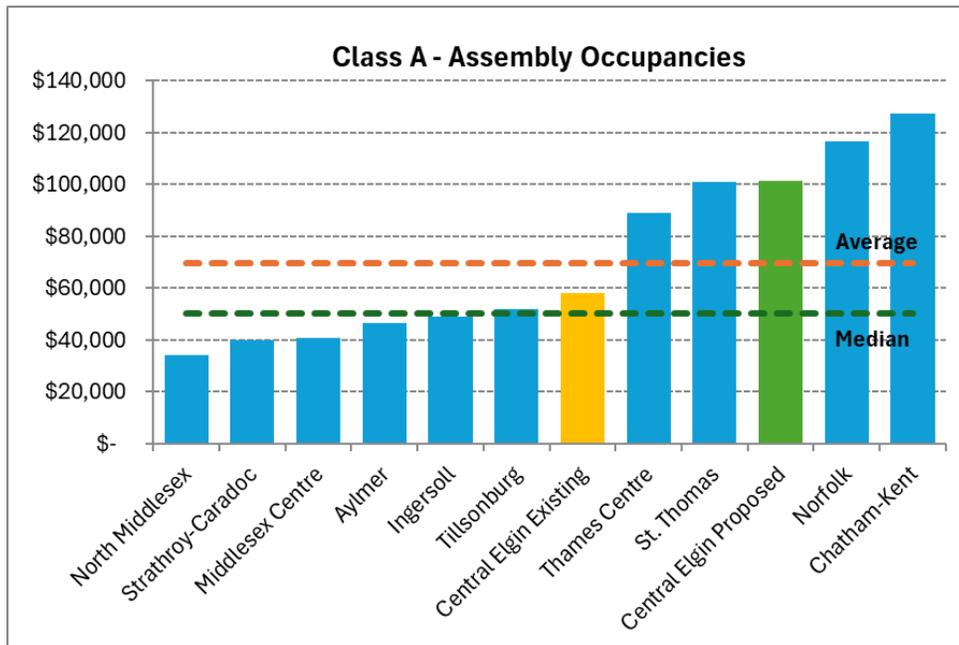
- There are a number of factors that have an impact on the cost of service including but not limited to:
 - demand for service and the service mix composition;
 - service levels and service standards;
 - land area served;
 - infilling versus new subdivisions, and
 - use of technology.

- Figure 8 shows the municipalities that were used in the fee comparison:

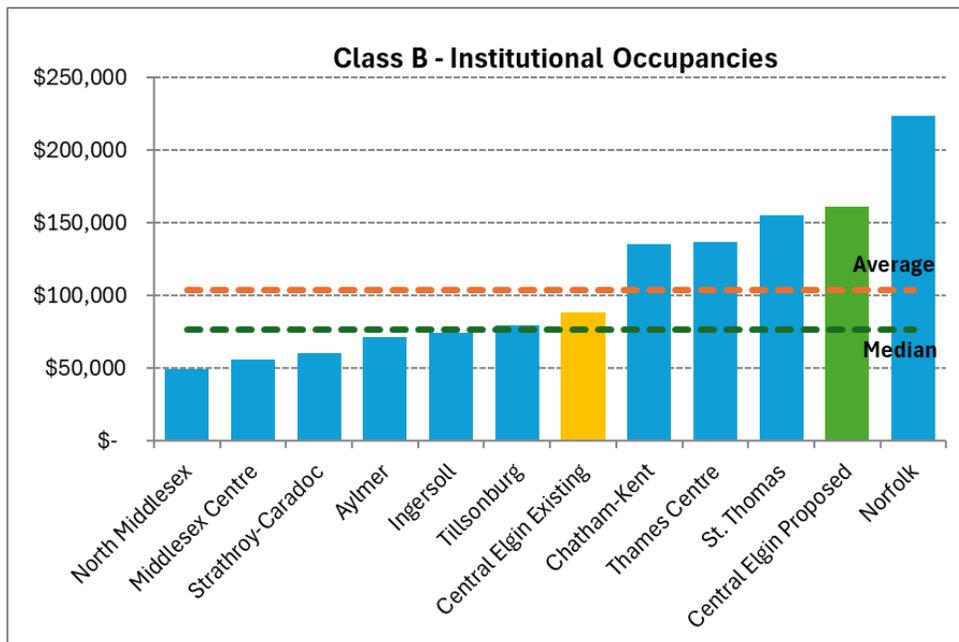
Figure 8 - Neighbouring Municipalities

Municipalities	Region/County/ District	Stats Canada 2016 Pop	Stats Canada 2021 Pop	% Increase	Land Area (km ²)	Pop/Land Area
North Middlesex	Middlesex	6,352	6,307	-0.7%	599	10.5
Middlesex Centre	Middlesex	17,262	18,928	9.7%	588	32.2
Thames Centre	Middlesex	13,191	13,980	6.0%	434	32.2
Norfolk	Norfolk	64,044	67,490	5.4%	1,598	42.2
Chatham-Kent	Chatham-Kent	101,647	103,988	2.3%	2,452	42.4
Central Elgin	Elgin	12,607	13,746	9.0%	280	49.1
Strathroy-Caradoc	Middlesex	20,867	23,871	14.4%	271	88.1
Tillsonburg	Oxford	15,872	18,615	17.3%	22	838.5
Ingersoll	Oxford	12,757	13,693	7.3%	13	1,075.6
St. Thomas	Elgin	38,909	42,840	10.1%	36	1,203.0
Aylmer	Elgin	7,492	7,699	2.8%	6	1,208.6
Average		28,273	30,105	6.5%	573	52.6

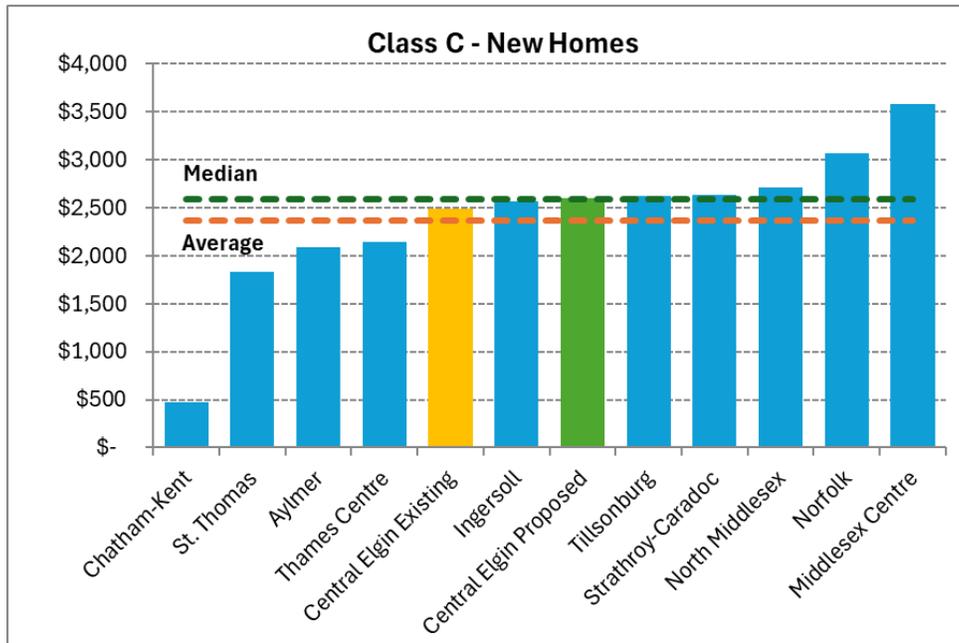
- Central Elgin’s proposed building permit fees are competitive with neighbouring municipalities, as will be shown in the following graphs.
- It should be noted that that the comparator municipalities are based on 2025 fees (most current available) and the proposed fees for Central Elgin are based on 2026 fees.
- Size of construction for each classification of fees was based on averages per application type in Elgin County.



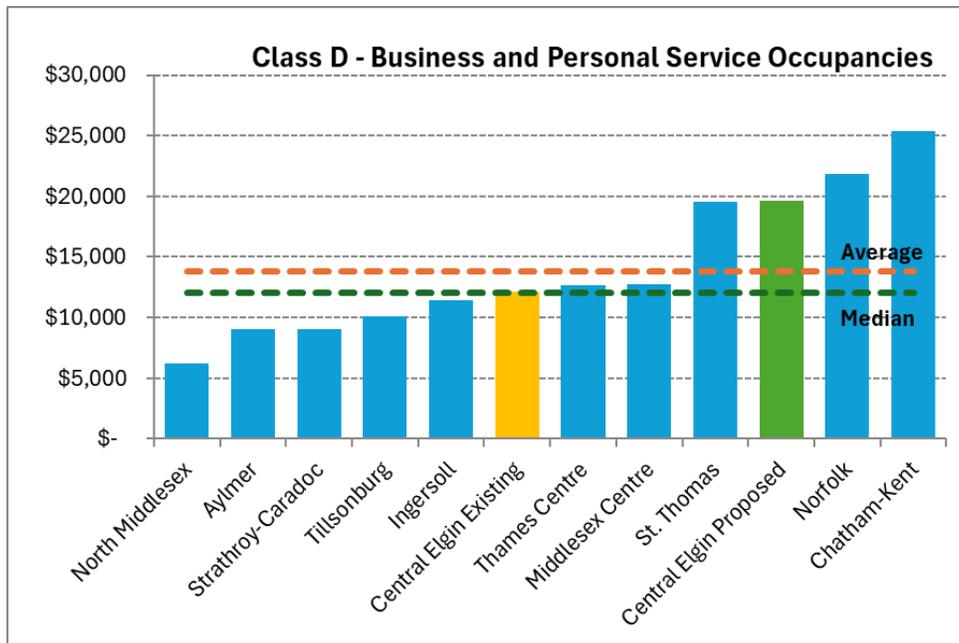
Note: Sample property size of 51,678 sq.ft.



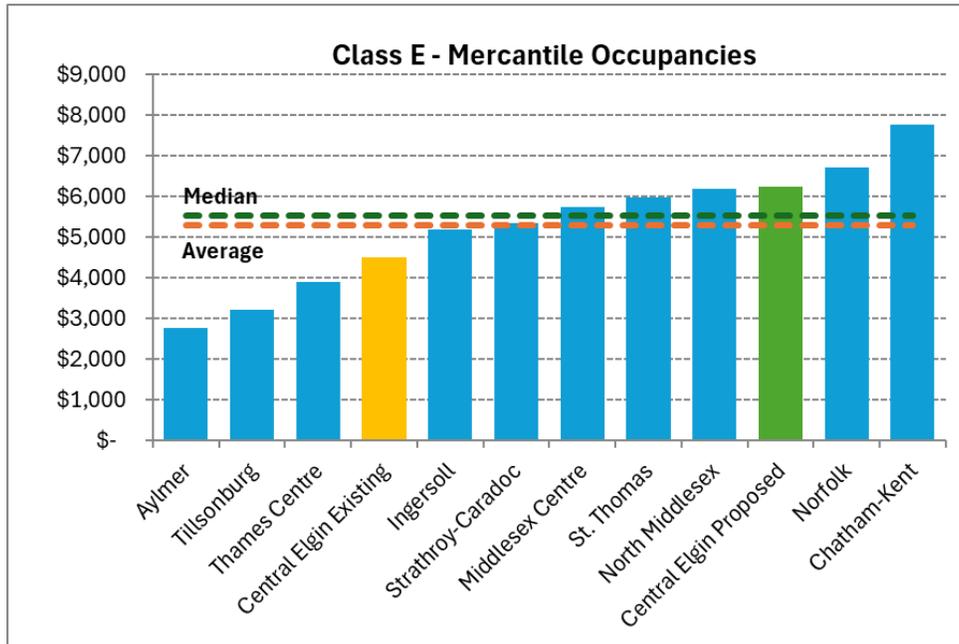
Note: Sample property size of 79,523 sq.ft.



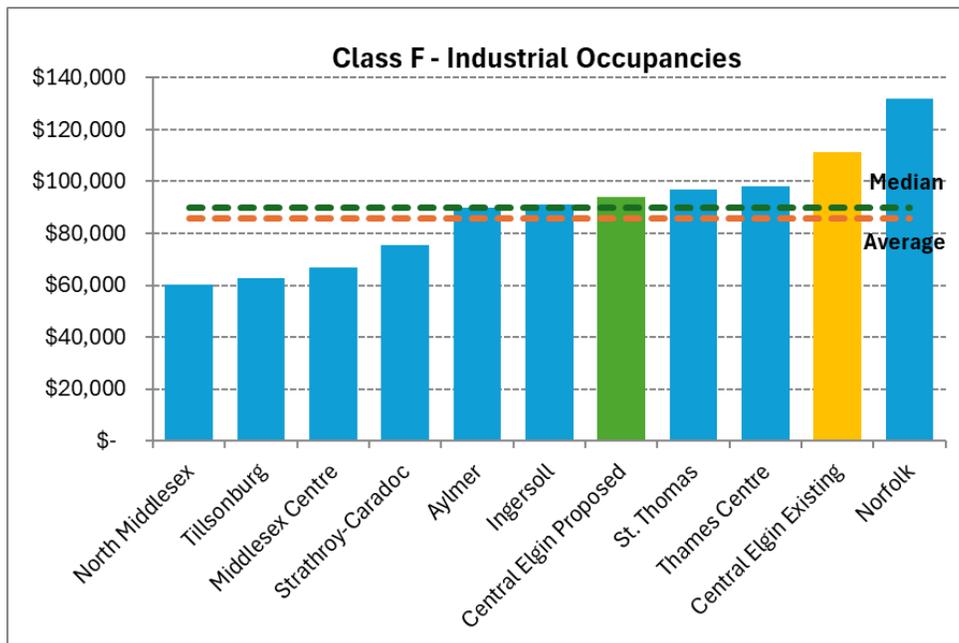
Note: Sample property size of 1,668 sq.ft.



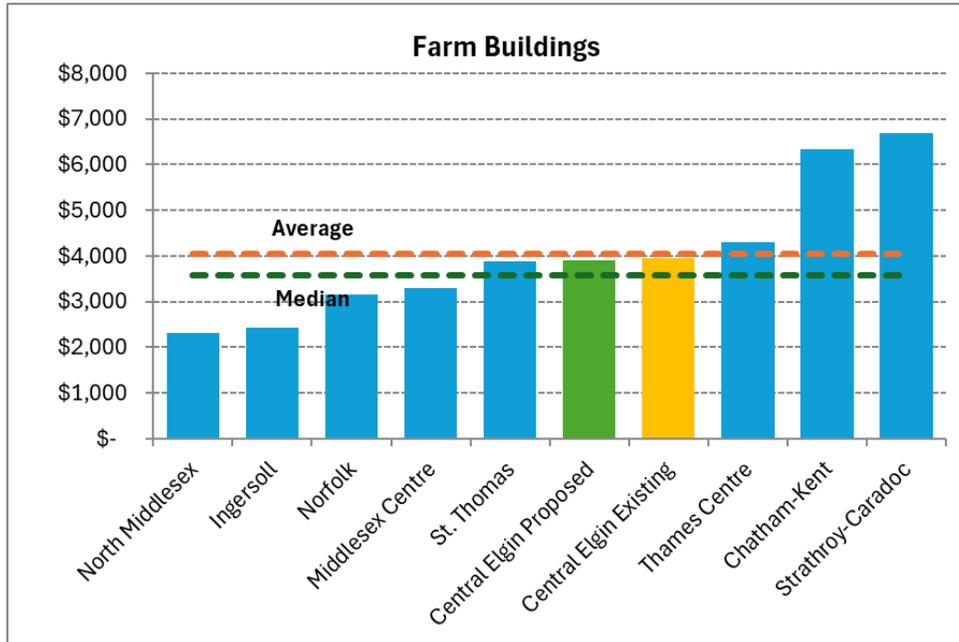
Note: Sample property size of 10,000 sq.ft.



Note: Sample property size of 3,068 sq.ft.



Note: Sample property size of 100,000 sq.ft.



Note: Sample property size of 10,000 sq.ft, with a total construction value of \$50 per sq.ft.

7 Recommendations

7.1 Recommendations

- 1. That Council adopt the 2026 building permit fees as set out in Appendix 'A' of this report.***
- 2. That Council adjust the fees annually based on the Statistics Canada Consumer Price Index.***
- 3. That the Building Reserve Fund target be set at 150% of gross operating expenses.***

8 Appendix A – Summary of Proposed Fees 2026

Municipality of Central Elgin - Building Permit Fees Review

Description	Central Elgin - existing	Central Elgin - NEW
Minimum permit fee	Various	\$208
Group A – Assembly Occupancies		
School, church, restaurant, library, theatre, educational or recreational facility and occupancies of a similar nature	\$3,861.12 + \$1.10 per sq ft > 2,500 sq ft OR \$5.20 per \$1,000 value	\$1.96/SQ. FT.
Additions and Alterations	for >\$50,000: \$3,843.89 + \$1.10/SQ. FT for buildings greater than 2,500 SQ. FT \$4.16/\$1,000 value of construction where SQ. FT cannot be determined. for <\$50,000: \$2,576.73 + \$0.52/SQ. FT for buildings greater than 2,500 SQ. FT \$10.39/\$1,000 value of construction where SQ. FT cannot be determined.	\$1.18/SQ. FT.
Group B – Institutional Occupancies		
Hospital, nursing home, reformatory, prison and occupancies of a similar nature	\$3,861.12 + \$1.10 per sq ft > 2,500 sq ft OR \$8.31 per \$1,000 value	\$2.03/SQ. FT.
Additions and Alterations	for >\$50,000: \$3,843.89 + \$1.10/SQ. FT for buildings greater than 2,500 SQ. FT \$12.47/\$1,000 value of construction where SQ. FT cannot be determined. for <\$50,000: \$2,576.73 + \$0.52/SQ. FT for buildings greater than 2,500 SQ. FT \$14.55/\$1,000 value of construction where SQ. FT cannot be determined.	\$1.22/SQ. FT.
Group C – Residential Occupancies		
New Residential Construction, Large Additions (>\$50,000)	\$2,493.60 + \$1.04 per sq ft for over 2,398.2 sq ft	\$1.56/SQ. FT.
Garage, Carport, Small Additions (<\$50,000)	\$156 + \$0.52/SQ. FT for buildings greater than 300 SQ. FT \$14.55/\$1,000 value of construction where SQ. FT cannot be determined.	\$0.78/SQ. FT.
Deck, Porch, Shed (accessory building), Finish Basement in dwelling unit	\$156 + \$0.52/SQ. FT for buildings greater than 300 SQ. FT \$14.55/\$1,000 value of construction where SQ. FT cannot be determined.	\$347
Swimming pool	\$156 + \$0.52/SQ. FT for buildings greater than 300 SQ. FT \$14.55/\$1,000 value of construction where SQ. FT cannot be determined.	\$208
Group D – Business and Personal Service Occupancies		
Office or medical building, financial institution and occupancies of a similar nature	\$3,861.12 + \$1.10 per sq ft > 2,500 sq ft OR \$5.20 per \$1,000 value	\$1.96/SQ. FT.
Additions and Alterations	for >\$50,000: \$3,843.89 + \$1.10/SQ. FT for buildings greater than 2,500 SQ. FT \$4.16/\$1,000 value of construction where SQ. FT cannot be determined. for <\$50,000: \$2,576.73 + \$0.52/SQ. FT for buildings greater than 2,500 SQ. FT \$10.39/\$1,000 value of construction where SQ. FT cannot be determined.	\$1.18/SQ. FT.
Group E – Mercantile Occupancies		
Low rise retail store, strip plaza, restaurant and occupancies of a similar nature	\$3,861.12 + \$1.10 per sq ft > 2,500 sq ft OR \$5.20 per \$1,000 value	\$2.03/SQ. FT.
Additions and Alterations	for >\$50,000: \$3,843.89 + \$1.10/SQ. FT for buildings greater than 2,500 SQ. FT \$4.16/\$1,000 value of construction where SQ. FT cannot be determined. for <\$50,000: \$2,576.73 + \$0.52/SQ. FT for buildings greater than 2,500 SQ. FT \$10.39/\$1,000 value of construction where SQ. FT cannot be determined.	\$1.22/SQ. FT.
Group F – Industrial Occupancies		
Factory, plant, warehouse, industrial building and occupancies of a similar nature	\$3,861.12 + \$1.10 per sq ft > 2,500 sq ft OR \$5.20 per \$1,000 value	\$0.94/SQ. FT.
Additions and Alterations	for >\$50,000: \$3,843.89 + \$1.10/SQ. FT for buildings greater than 2,500 SQ. FT \$4.16/\$1,000 value of construction where SQ. FT cannot be determined. for <\$50,000: \$2,576.73 + \$0.52/SQ. FT for buildings greater than 2,500 SQ. FT \$10.39/\$1,000 value of construction where SQ. FT cannot be determined.	\$0.66/SQ. FT.
Farm Buildings		
New Farm Construction, Grain Bins, Silos, or Buildings for the Storage of Grain	\$2,007.79 + \$0.26 per sq ft > 2,500 sq ft OR \$4.16 per \$1,000 value	\$0.39/SQ. FT.
Additions and Alterations	\$2,007.79 + \$0.44/SQ. FT for buildings greater than 2,500 SQ. FT \$4.16/\$1,000 value of construction where SQ. FT cannot be determined.	\$0.27/SQ. FT.

Municipality of Central Elgin - Building Permit Fees Review

Description	Central Elgin - existing	Central Elgin - NEW
Designated Structures		
Retaining Wall	NEW	\$3.77/Linear FT.
Signs Regulated by the Building Code	NEW	\$208
Wind Turbine or Roof-Mounted Solar Panel	\$259.75 + \$10.39/\$1,000 value of construction	\$417
Miscellaneous Works		
Tents	\$52	\$208
Tents - non-profit organizations	\$26	\$104
Woodstoves	\$260	\$347
Demolition Permits Residential	\$156	\$208
Demolition Permits Non-Residential	\$883	\$973
Septic System - New	\$571	\$695
Septic System - Repaid	\$358	\$417
Administration		
Transfer of permit	\$52	\$139
Change of use	NEW	\$208
Other Permits not Noted	\$156	\$208
File Search, Document Retrieval	\$52	\$69
Inspections		
Re-inspection after 3 inspection	NEW	\$208
Other Inspections not Noted	\$77.93/hr	\$139/hr
Plans Examination		
Review of Alternative Solution (staff)	\$77.93/hr, minimum \$156	\$139/hr, minimum \$208
Review of Alternative Solution (complex)	Direct costs incurred by Municipality for peer review by an Independent Professional Engineer and/or Architect, minimum \$1,558.5	Direct costs incurred by Municipality for peer review by an Independent Professional Engineer and/or Architect, minimum \$1,667
CONDITIONAL PERMITS		
Conditional Permits	\$530	\$695
FEE BASED ON VALUE OF CONSTRUCTION		
For categories of construction not listed above (per \$1,000 of construction)	Various	\$10.40