

Township of
Langley



Est. 1873

REPORT TO MAYOR AND COUNCIL

PRESENTED:	NOVEMBER 18, 2019 – REGULAR AFTERNOON MEETING	REPORT:	19-173
FROM:	COMMUNITY DEVELOPMENT DIVISION	FILE:	LSP00007
SUBJECT:	COMMUNITY AMENITY CONTRIBUTIONS POLICY (EXEMPTIONS)		

RECOMMENDATION:

That Council adopt amendments to the Community Amenity Contributions Policy, particularly relating to potential exemptions, as presented as Attachment C to this report, and direct staff to implement its provisions effective immediately as applicable for all applications listed on Attachment A to this report.

EXECUTIVE SUMMARY:

At the Regular Afternoon Meeting on October 21, 2019, Council passed a resolution directing staff to consider revisions to the Community Amenity Contributions (CAC) Policy 07-166; to A) potentially introduce a phased approach for exempting rezoning applications based on specified criteria; or B) remove section 5.4(f) as a potential condition to exempt applications.

On July 23, 2018, Council approved the CAC Policy, which was amended by Council on April 15, 2019. These two dates are critical criteria for the contemplated revisions, as they provide specific dates and are consistent with considerations, such as principles of legitimate expectations and transparency, discussed in previous reports to Council. Accordingly, the revisions recommended focus on specific rezoning applications that were submitted on or before July 31, 2018; and which have received third reading on or before April 15, 2019. The applications meeting these criteria are generally referred to in this report as “Specific In-stream Applications”.

There are 22 Specific In-Stream Applications, with a total potential CAC target contribution amount of approximately \$11.6 million.

Accordingly, based on Council direction, the following revisions to the CAC Policy are recommended:

- **Phased Exemption:** The CAC target contribution amounts for the Specific In-Stream Applications would be reduced by 75%, if final adoption is granted by Council before December 31, 2019, by 50%, between January 1 and March 31, 2020; and by 25%, between April 1 and June 30, 2020, after which the target amounts would follow Table 2 of the Policy at 100% with no reductions.
- **Streamlining Specific In-Stream Applications:** Specific In-Stream Applications would have the option to use an Acknowledgement and Release Letter instead of a Phased Development Agreement (PDA) process to secure payment of CAC funds, in order to eliminate the need for additional procedural requirements, considering current status.

Three housekeeping revisions are necessitated, as a result of the above recommendations, as outlined in this report, to effect implementation of the amendments as recommended.

PURPOSE:

This report responds to Council’s direction for staff to consider revisions to the Community Amenity Contributions Policy to provide clarity and consistency related to exemptions from the program.

BACKGROUND/HISTORY:

On July 23, 2018, Council approved the Community Amenity Contributions (CAC) Policy. The CAC Policy was amended by Council on April 15, 2019. It is applied Township-wide to all new residential development that requires Council approval of a rezoning application. The CAC is administered using a target contribution amount on a per unit basis. The CACs are to be placed into reserve funds and used for development of amenities, such as Township-wide greenways, satellite RCMP Detachment, a conference and entertainment centre, and recreation centres. In addition, to address issues related to housing affordability, 11% of CAC revenues are being directed towards an Affordable Housing Reserve Fund.

At the Regular Afternoon Meeting on October 21, 2019, Council passed a resolution directing staff to consider and bring forward potential revisions to the Community Amenity Contributions Policy No. 07-166, to consider one of the following two options:

- A. *Potentially implement a phased exemption approach similar in concept to Development Cost Charges (DCCs) but with graduated increases over time similar to the current CAC framework, a definitive sunset to the potential for exemption, and authority delegated to staff within clearly defined parameters and criteria; or*
- B. *To remove 5.4(f) as a potential condition by which development can apply to Council for an exemption from Community Amenity Contributions program.*

DISCUSSION/ANALYSIS:

On April 15, 2019, the CAC Policy was amended to include the use of Phased Development Agreements (PDAs) as the tool to implement the policy. As the PDA requires a Public Hearing, as per the *Local Government Act* (LGA), development applications that have been given third reading for a rezoning bylaw could be onerous and burdensome. To reduce the burden, section 5.4(f) of the Policy provides an exemption option for applications that had been in-stream prior to July 31, 2018 and had received third reading prior to the April 15, 2019 amendments (“Specific In-Stream Applications”), subject to Council consideration.

There are 22 Specific In-Stream Applications. Of these Specific In-Stream Applications, two meet the exemption criteria in section 5.4(b), which exempts the original (or parent) lot if a rezoning application proposes fewer than three lots. The rest (20 Specific In-Stream Applications) could seek an exemption from the Policy as per section 5.4(f), with a potential total CAC target contribution amount of approximately \$11.6 million.

In considering the contemplated revisions to the CAC Policy, it is important to be mindful of the key principles when establishing a CAC program, such as: nexus, consistency, proportionality, transparency, and legitimate expectation. These principles were discussed in previous reports to Council on CACs and outlined in the Provincial Guide to CAC Best Practices (Community Amenity Contributions: Balancing Community Planning, Public Benefits and Housing Affordability). The following discussion and recommendations follow these principles.

Based on the foregoing discussion and analysis, it is recommended that a phased exemption provision be added to the CAC Policy. This phased approach would give Specific In-Stream Applications an extended grace period to obtain final reading of a rezoning bylaw, with a reduction of the target contribution amounts in Table 2 of the Policy, as follows:

- 75% reduction until December 31, 2019
- 50% reduction until March 31, 2020
- 25% reduction until June 30, 2020
- No exemption after July 1, 2020 (Table 2 as per the Policy)

Attachment A summarizes the list of Specific In-Stream Applications, and target contribution amounts before exemption, the proposed phased exemption periods, and projected final reading for each application, based on information currently available and assuming continued and uninterrupted advancement by application proponents.

It is further recommended that all Specific In-Stream Applications be given an option to use an Acknowledgement and Release Letter, rather than a Phased Development Agreement (PDA) bylaw process to secure payment of funds, in order to eliminate the need for additional procedural requirements, in consideration of current status of these applications. This option is recommended based on legal advice. An example of an Acknowledgement and Release Letter is provided as Attachment B to this report.

With the above recommendations, section 5.4(f) of the Policy would be replaced with the following:

5.4(f) “For development applications received prior to July 31, 2018 and received third reading prior to April 15, 2019, the following shall apply:

- i. CACs shall be based on the targets in the table below, and*
- ii. CACs will be secured through an Acknowledgement and Release Letter.*

Phased Exemptions for Specific In-Stream Applications (submitted before July 31, 2018, and third reading before April 15, 2019)	New Single Family - per lot	Townhouse / Rowhouse / Duplex - per unit	Low Rise Apartment (6 storeys or less) - per unit	Mid-High Rise Apartment (7 storeys or more) - per unit
Exemption Phase 1: Final Reading prior to December 31, 2019 (25% of applicable CACs)	\$1,418	\$1,204	\$946	\$731
Exemption Phase 2: Final Reading from January 1 to March 31, 2020 (50% of applicable CACs)	\$2,837	\$2,407	\$1,891	\$1,462
Exemption Phase 3: Final Treading from April 1 to June 30, 2020 (75% of applicable CACs)	\$4,255	\$3,611	\$2,837	\$2,192
Final Reading after July 1, 2020	(Same as Table 2 of the CAC Policy)			

As a result of the above recommendations, the following additional housekeeping revisions are necessary for clarity and consistent implementation purposes:

1. Delete the first sentence in section 5.4 “Exemptions” and replace it with the following:

“Development that meets the following conditions is exempt from the CAC program:”

COMMUNITY AMENITY CONTRIBUTIONS POLICY
(EXEMPTIONS)

Page 4 . . .

2. Delete section 5.2(e) and replace it with the following:

“The Township will use phased development agreements or acknowledgement and release letters as the mechanisms to obtain cash in lieu Community Amenity Contributions. In site by site negotiations, the Township will seek to obtain a target contribution that makes a meaningful contribution to community amenities while ensuring that land owners still have enough incentive to make land available in the redevelopment market.”

3. Delete section 5.5(a) and replace it with the following:

“Payment of the CAC shall be made to the Township, prior to Council consideration of adoption of the Zoning Bylaw amendment bylaw. At the discretion of the General Manager of Engineering and Community Development, the provision of CACs may be secured through either a Phased Development Agreement or Acknowledgement and Release Letter. If adoption is not given by Council to the Zoning Bylaw amendment bylaw, the CAC (without interest) shall be returned to the applicant by the Township.”

The proposed revisions to the CAC Policy provide clarity for applicants and staff and improves efficiencies by not having to seek Council’s consideration for exemptions on a case-by-case basis. Attachment C is the draft revised CAC policy with the recommended changes. Amendments to the exemption criteria provide a clear path forward for development applications received after July 31, 2018 and have obtained third reading prior to April 15, 2019 through a streamlined application process which proposed to use an Acknowledgement and Release Letter as the CAC collection tool and a phasing in of the CAC target contribution amounts to be complete by July 1, 2020.

Respectfully submitted,

Aubrey Jensen
COMMUNITY AND POLICY PLANNER
for
COMMUNITY DEVELOPMENT DIVISION

ATTACHMENT A List of Specific In-Stream Applications

ATTACHMENT B Acknowledgement and Release Letter

ATTACHMENT C Draft Revised Community Amenity Contributions Policy No. 07-166

List of Specific In-Stream Applications

#	Applicant	Location	Application Date	3rd Reading Date	Estiamted CAC (no exemption)	Projected Final Reading Timeline			
						2019 - Q4	2020 - Q1	2020 - Q2	2020 - Q3
1	JAGDEO	7146 206 Street	08/11/2016	08/05/2017	\$28,365.00				X
2	1131703 BC LTD	21020 72 Avenue	11/10/2017	10/12/2018	\$62,403.00		X		
3	0938428 BC LTD/APLIN & MARTIN	20214 82 Avenue	30/01/2018	03/12/2018	\$250,328.00	X			
4	1002851 BC LTD/BARNETT DEMBEK	20321 80 Avenue	23/12/2015	30/01/2017	\$240,700.00		X		
5	ESSENCE PROPERTIES	20139 & 20159 80 Avenue	24/11/2017	10/12/2018	\$515,098.00	X FINAL RDG NOV 4/19			
6	1041129 BC LTD/FOCUS ARCHITECT	19875, 19887, and 19929 75A Avenue	03/11/2017	15/04/2019	\$293,654.00				X
7	HALLEN/103402 2 BC LTD	21793 86A Avenue	3/11/2016	27/06/2016	\$11,346.00				X
8	DENGHEL/BAART S	8707 217A Street	24/08/2016	06/02/2017	\$11,346.00		X		
9	YORKSON MEDICAL LTD	7900 Block of 206 Street	30/05/2018	01/04/2019	\$83,204.00			X	
10	KOONER	3492 205 Street	30/07/2015	27/06/2016	\$243,939.00				X
11	COPPER CANYON HOLDINGS INC	20450 36 Avenue	30/07/2015	27/06/2016	\$226,920.00				X
12	GARCHA PROPERTIES	7615, 7633, 7649, and 7697 208 Street	13/04/2015	19/09/2016	\$916,718.00	X FINAL RDG NOV 4/19			
13	PHOENIX HOMES	8170 & 8184 - 208 Street	04/08/2006	21/01/2008	\$718,294.00				X
14	PHOENIX HOMES LIMITED	ptn of 8170 & 8184 - 208 Street	12/11/2009	18/04/2011	\$192,560.00				X
15	PLATINUM GROUP LTD	20065 & 20287 27 Avenue, 2748 202 Street, and 2740 200 Street	07/10/2017	17/09/2018	\$374,418.00				X
16	QUALICO DEVELOPMENTS (VCR) INC	3354, 3424, 3430, 3474, and 3502 208 Street	16/05/2017	06/06/2018	\$476,532.00				X
17	RENO INVESTMENTS 2011 LTD	22310, 22322, 22338 & 22390 48 Avenue	16/07/2012	10/07/2017	\$192,560.00	X FINAL RDG NOV 4/19			
18	SANDHILL HOMES LTD	4400 Block of 222 Street	08/10/2015	17/09/2018	\$73,749.00			X	
19	VESTA PROPERTIES (LATIMER) LTD	20039 84 Avenue and 20088 86 Avenue	10/10/2017	01/10/2018	\$2,589,216.00			X	
20	VESTA PROPERTIES (LATIMER) LTD	20059 82 Avenue and 8242 & 8262 200 Street	03/05/2018	23/07/2018	\$973,036.00			X	
21	ZENTERRA DEVELOPMENTS	7507 200 Street	29/01/2018	25/02/2019	\$617,862.00				X
22	CARE PACIFIC (MAPLE GARDENS)	7743 and 7787 200 Street	20/11/2017	05/02/2018	\$2,548,856.00				X
					\$11,641,104.00				

ACKNOWLEDGEMENT AND RELEASE

Dated for reference and made as of the _____, 2019,

TO:

THE CORPORATION OF THE TOWNSHIP OF LANGLEY, a company incorporated under the laws of British Columbia, having an address at 20338 – 65 Avenue, Langley, BC V2Y 3J1

(the “**Township**”)

FROM:

_____, a company incorporated under the laws of British Columbia, having an address at _____

(“**company name**”)

WHEREAS:

- A. _____ is the registered and the only beneficial owner of certain land and premises legally described as: PID: _____, Lot __ Section __ Township __ New Westminster District Plan _____ (the “**Property**”);
- B. _____ wishes to develop the Property for *insert quantity and type of housing units (single family/townhouse/apartment)* units, with associated works and services (the “**Development**”);
- C. To facilitate the Development, *company name* applied to rezone the Property from *insert Zoning* (____) to Comprehensive Development (CD-____), as set out in Rezoning Application No. _____ (the “**Rezoning Application**”) and associated Township of Langley Zoning Amendment Bylaw No. _____ (the “**Bylaw**”);
- D. In connection with the Rezoning Application, *company name* agreed to deliver to the Township cash in lieu of community amenities, in accordance with the Township’s policy 07-166 (the “**Policy**”). The amount of cash in lieu calculated pursuant to the Policy is \$ _____ .00 (the “**Contribution**”); and
- E. *company name* would like to confirm its commitment to deliver the Contribution in accordance with the Policy,

NOW THEREFORE, in connection with the Rezoning Application, *company name* represents, acknowledges and agrees as follows:

1. Payment of Contribution

- 1.1. company name hereby warrants and represents that it is the registered and the only beneficial owner of the Property and is not holding the Property as a bare trustee.
- 1.2. As contemplated in the Policy, company name will either:
 - (a) deliver the Contribution prior to the adoption of Bylaw; or
 - (b) deliver the Contribution prior to the issuance of a development permit, or a building permit (where development permit is not required), for the Development, in which case company name will deliver to the Township an irrevocable letter of credit for the amount of Contribution prior to the adoption of the Bylaw.

2. No Restitution

- 2.1. company name acknowledges and agrees that the delivery of the Contribution and this Acknowledgement and Release in no way means that the Township has pre-approved or guaranteed that any Bylaw will be adopted for the Property.
- 2.2. company name is delivering the contribution voluntarily and will have no further claims thereto.
- 2.3. Whether or not company name develops the Property to construct the Development, or in any other manner, company name will not seek restitution in relation to the Contribution, and will not commence, advance or support any legal proceedings to recover any portion of the Contribution, or to seek restitution in relation to the Contribution. If company name institutes any proceedings or claims contrary to this section 2.3, the Township may provide this Acknowledgement and Release to a Court as a full and complete answer.

3. Release

company name hereby releases the Township from all claims that company name may have (whether known or unknown) as a result of delivering the Contribution, including a claim in unjust enrichment.

company name.

By:

Authorized Signatory

DRAFT: Potential revisions to the current CAC policy are indicated in red font, and text to be removed is struck out.



COUNCIL POLICY

Subject: Community Amenity Contributions	Policy No:	07-166
	Approved by Council:	2018-07-23
	Revised by Council:	2019-04-15

1. Purpose

- 1.1 To provide administrative guidelines for a Community Amenity Contribution (CAC) Program.

2. Background

- 2.1 Municipalities are required to balance their budgets, which means the demand for new capital infrastructure and improvements must be kept within current fiscal and economic limits. Development Cost Charges (DCC), which are a primary source of funding especially for roads, water, sewer, stormwater systems, and park land acquisition and improvement, do not sufficiently assist in providing all facilities required for new communities.
- 2.2 CACs are amenity contributions by the developer as part of a rezoning process.
- 2.3 CACs are intended to offset the cost of providing community amenities associated with new residential development, thereby having a benefit to the community. In the event that CACs are not made to help provide the amenities, it is not necessarily in the public interest for the local government to support a rezoning. It has become common practice for many municipalities in B.C. for developers to propose, or municipalities to seek, amenities from projects that are applying for changes in use or density, in order to help address the needs or impacts of new development. In this policy, the amenities are intended to be collected through a fixed rate contribution, based on a set of predetermined amenities.

3. Related Policies

- 3.1 The Official Community Plan (OCP) provides objectives and policies for the establishment of a community amenity contribution program. Objectives related to CACs aim to:
- (a) Ensure that new development pays for the capital costs of providing new infrastructure and facilities to serve that development.
 - (b) Diversify revenue sources to fund new community infrastructure.
 - (c) Provide tools and incentives to encourage affordable housing options.

3.2 Specific policies include:

- (a) Investigate potential for community amenity charges to cover the costs of facilities and amenities required for development that are not funded by DCCs.
- (b) Create incentives to encourage developers to include affordable market rental housing and/or non-market housing in new developments, using community amenity contributions that include affordable housing as a community benefit (new units or cash).

4. Principles

- 4.1 As residential growth occurs, new development should make a fair contribution to new community amenities, affordable housing, and other community needs, in order to meet the needs of a growing community and to contribute to managing growth pressures.
- 4.2 The Township of Langley will set its targets for CACs such that the cost implications for new development will be reasonable. The level of CACs will be such that there is minimal impact on new development. More specifically, the expectations for CACs are not likely to affect the financial viability of new development projects. The costs will be such that developers and land owners will still see incentives to seek higher density for residential developments.

5. Policy

- 5.1 The provision of community amenities will be subject to community input, Council prioritization and available revenue. Where one developer is not expected to provide an entire amenity, the developer may pay the Township cash in lieu, referred to as CACs. The amenities are as follows:
 - (a) 15% will be Affordable Housing, and therefore 15% of CACs will go into the Affordable Housing Reserve Fund; and
 - (b) 74% of community amenities will be Township-wide enhancements, and therefore 74% of CACs will go into a Community Amenity Contribution Fund to assist in funding of the following amenities:
 - Township-wide Greenway
 - Satellite RCMP Detachment
 - Conference and Entertainment Centre
 - Recreation Centre in Willowbrook-Willoughby
 - Recreation Centre in Brookwood-Ferridge
 - (c) 11% of community amenities will be enhancements to areas within the Aldergrove Core Area Plan, and therefore 11% of CACs will go into an Aldergrove Community Amenity Fund to assist in funding amenities.

- 5.2 The Township intends to obtain contributions to civic infrastructure and amenities from new development that involves rezoning. In doing so, the Township will apply the following principles:
- (a) New development should make a fair contribution to new community amenities, affordable housing, and other community needs, to meet the needs of a growing community and to address some of the impacts of growth.
 - (b) The Township’s community amenities are set out in section 5.1.
 - (c) The Township will set its targets for amenities (and for cash in lieu of amenities, referred to herein as CACs, where one developer is not expected to provide an entire amenity) such that the cost implications for new development will be reasonable. The extent of Community Amenity Contributions will be such that there is little risk that there will be any impact on the pace of new development in the Township.
 - (d) The Township will set targets for cash in lieu Community Amenity Contributions it hopes to obtain from new development. Effective January 1, 2021 the targets as set out in Table 1 may be reviewed by Council from time to time, based on changing community needs, changing priorities, and changing market conditions.
 - (e) The Township will use phased development agreements **or acknowledgement and release letters as the mechanisms** to obtain cash in lieu Community Amenity Contributions. In site by site negotiations, the Township will seek to obtain a target contribution that makes a meaningful contribution to community amenities while ensuring that land owners still have enough incentive to make land available in the redevelopment market.

Table 1

Residential Type	Target Amenity Contribution	Required Amenity (or) Allocation of the Amenity Contribution
New single family lot	\$6,808 per lot	See section 5.1
Townhouse/rowhouse/duplex or other ground-oriented dwelling unit	\$5,776 per unit	See section 5.1
Low rise apartment (6 storeys or less)	\$4,539 per unit	See section 5.1
Mid-high rise apartment (7 storeys or more)	\$3,507 per unit	See section 5.1

5.3 (This section was deleted on April 15, 2019.)

5.4 EXEMPTIONS

Where a ~~Development~~ **Development that** meets the following conditions ~~Council may consider an exemption~~ **is exempt** from the CAC program:

- (a) Any not-for-profit development as defined in the Development Cost Charge Waiver For Affordable and Supportive Housing Bylaw 2019 NO. 5462
- (b) Where single family residential subdivisions propose fewer than 3 lots, the original lot is exempt, after which the CAC program applies to each new lot;
- (c) Accessory dwelling units, such as a secondary suite or coach house;
- (d) Duplex, triplex and fourplex dwelling units, where only one building is being constructed – only the first dwelling unit is exempt, after which the CAC program applies to each additional dwelling unit.
- (e) The development of residential dwellings within the area identified in the Aldergrove Core Area Plan, including mixed-use development, that have received Third Reading from Council prior to July 31, 2024.
- (f) ~~Residential rezoning applications received prior to initial adoption of this Policy on July 31, 2018, and that have received Third Reading from Council prior to adoption of the amended Policy on April 15, 2019.~~

For development applications received prior to July 31, 2018 and received third reading prior to April 15, 2019, the following shall apply:

- i. The Township’s community amenity contribution shall be based on the targets in the table below, and
- ii. CACs will be secured through an Acknowledgement and Release Letter.

Phased Exemptions for Specific In-Stream Applications <small>(submitted before July 31, 2018, and third reading before April 15, 2019)</small>	New Single Family - per lot	Townhouse / Rowhouse / Duplex - per unit	Low Rise Apartment (6 storeys or less) - per unit	Mid-High Rise Apartment (7 storeys or more) - per unit
Phase 1: Prior to December 31, 2019	\$1,418	\$1,204	\$946	\$731
Phase 2: January 01, to March 31, 2020	\$2,837	\$2,407	\$1,891	\$1,462
April 01, to June 30, 2020	\$4,255	\$3,611	\$2,837	\$2,192
July 01, to September 30, 2020	(Same as Table 2 of the CAC Policy)			
October 01 to December 31, 2020				
After January 01, 2021				

5.5 COLLECTION OF CACs

- (a) Payment of the CAC shall be made to the Township, prior to Council consideration of adoption of the Zoning Bylaw amendment bylaw. **At the discretion of the General Manager of Engineering and Community Development, the provision of CACs may be secured through either pursuant to a Phased Development Agreement or Acknowledgement and Release Letter.** If adoption is not given by Council to the Zoning Bylaw amendment bylaw, the CAC (without interest) shall be returned to the applicant by the Township.
- (b) Alternatively, payment of the CAC may be made to the Township at the time of issuance of a development permit, or where one is not required, at the time of issuance of a building permit. Where this option is selected by the applicant, an irrevocable letter of credit must be provided to the Township for the full amount of the CAC prior to Council consideration of adoption of the Zoning Bylaw amendment.

5.6 Any rezoning application, submitted prior to the final adoption of this policy, shall be granted a twelve (12) month grace period from the date of final adoption of this policy, in order to receive fourth and final reading by Council of the Zoning Amendment Bylaw. If the process is not completed within the one-year period, payment of the CAC shall apply.

5.7 Council may amend the CAC target contribution amounts and any other aspect of this Policy as it deems appropriate in response to changing needs.

5.8 The Township’s community amenity contribution targets shall be based on Table 2 below, increasing at 3-month intervals, applicable as per Section 5.5 above.

Table 2

	New single family lot – per lot	Townhouse / rowhouse / duplex or other ground-oriented dwelling unit – per unit	Low rise apartment (6 storeys or less) – per unit	Mid-high rise apartment (7 storeys or more) – per unit	Required Amenity (or) Allocation of the Amenity Contribution
Prior to January 01, 2020	\$ 5,673	\$4,814	\$3,782	\$2,923	See section 5.1
January 01 to March 31, 2020	\$5,673	\$4,814	\$3,782	\$2,923	See section 5.1
April 01 to June 30, 2020	\$5,957	\$5,055	\$3,971	\$3,069	See section 5.1

July 1 to September 30, 2020	\$6,241	\$5,295	\$4,161	\$3,215	See section 5.1
October 1 to December 31, 2020	\$6,524	\$5,536	\$4,350	\$3,361	See section 5.1
After January 1, 2021	\$6,808	\$5,776	\$4,539	\$3,507	See section 5.1

5.9 This Policy is to be administered and monitored by the Community Development Division and the Finance Division.

5.10 This Policy will be reviewed periodically to assess amenities and associated capital costs as required. Timing of the CAC Policy review will be offset so as not to overlap with the periodic review of the Development Cost Charges Bylaw to the extent possible.