



# BC Housing Permitting Housing Summary Engagement Report

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Ministry of  
Water, Land and  
Resource Stewardship

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## 1. INTRODUCTION

All British Columbians, regardless of geographic location or income, are impacted by the need for safe and affordable housing. As the provincial government continues to drive local governments to advance housing efforts, it must ensure the necessary permitting<sup>1</sup> processes are both coordinated and transparent. However, the current permitting system is not coordinated and requires builders to navigate multiple provincial permits, across various ministries, to secure permission to construct a housing development.



In January 2023, government announced one aspect of addressing the housing crisis in B.C. by accelerating and coordinating provincial permitting approvals for housing developments through a “one-stop shop.” The Permitting/ Authorizations and Statutory Decision-Making Solutions team (PASS) in the Ministry of Water, Land and Resource Stewardship (WLRS) was tasked to lead this work, alongside the Ministries of Environment, Forests, and Transportation. PASS with the partner ministries is responsible for the establishment of a Housing Action Taskforce (HAT), a single window and a single application to support transparency and an ease of use for the housing sector as it relates to provincial permitting.

To inform this work, PASS engaged with housing stakeholders to:

- Understand their experiences in obtaining permits for housing developments.
- Seek insights on ways to improve how the Province issues these permits.
- Obtain practical and viable opportunities to help shape the Province’s ‘one-window’ approach.
- Inform prioritization of the volume of existing applications.

This document summarizes the interview findings, identifies key themes for potential solutions to clarify and simplify processes, and proposes potential prioritization for process improvements to the provincial permitting process.

## 2. METHODOLOGY

### ENGAGEMENT APPROACH

WLRS sought input on government’s approach to provincial housing permitting. Participants were invited to provide their feedback and perspective in five areas:

- The pre-application step in the permitting process.<sup>2</sup>
- The application creation step of the permitting process.

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<sup>1</sup> For the purposes of this report, the terms permit and permitting includes the permits, authorizations, and related decisions by provincial statutory decision-makers.

<sup>2</sup> Additional information about the stages of the permitting process is found in Appendix C.

- The application intake step of the permitting process.
- The consultation, review, and decision steps (together) of the permitting process.
- Where government should prioritize improvements to the permitting process.

**Diagram 1: Six stages of the permitting process**



More specifically, WLRS undertook the following activities:

- A series of two-hour virtual workshops, held between late February and the end of March, with:
  - Canadian Home Builders Association BC.
  - Developers and Builders Associations.
    - British Columbia Real Estate Associations.
    - BC Construction Association.
  - BC Housing.
  - BC Non-Profit Housing Associations.
  - Aboriginal Housing Management Association and member organizations.
- Informal discussions between stakeholders and WLRS leadership.
- A conversation with UBCM and a questionnaire directed to members of the Union of BC Municipalities (23 submissions).



### 3. SUMMARY OF FINDINGS

Over the course of the engagement, housing stakeholders identified a suite of solutions for government's consideration.

Solutions for more straightforward and transparent permitting fall into the following themes:

- Provide process clarity by creating a roadmap to guide proponents and identify professional resources.
- Ensure permitting process information is available and easily accessible.
- Build awareness in municipalities on the provincial permitting processes so they can clearly communicate requirements.
- Clarify when and how engagement should occur (e.g., First Nations, public).



- Establish reasonable, fair, and transparent timelines, and monitor and report on progress.
- Establish clear and complete application requirements.
- Establish consistent direction and rules and clarify the role of decision-makers.
- Use reasonable assessment criteria to reduce the “grey area” for interpretation.
- Reduce application processing delays caused by incomplete information.
- Reduce wait times by incorporating concurrent approval opportunities.
- Encourage a collaborative approach between the Province and housing partners.
- Incorporate a navigator role (formerly referred to as a concierge role) component to champion the process and support proponents.
- Implement a single application approach and use tools like autofill.
- Develop geospatial tools to inform development constraints.


When participants were asked their priorities to improve permitting, the following themes were noted most frequently:

- Provide resources to improve timeliness of decisions.
- Establish a triage system or prioritization of applications.
- Address review delays by establishing transparent timelines.
- Increase education and information sharing with the sectors.
- Build a foundation of trust.

## 4. DETAILED SUMMARY OF THEMES



### SOLUTIONS

The following table outlines the solution themes in more detail:

THEME	SUMMARY OF RELATED COMMENTS
 <p><b>Provide process clarity by creating a roadmap to guide proponents and identify professional resources</b></p>	<ul style="list-style-type: none"> <li>• Clarity is the single most important aspect of this endeavor.</li> <li>• Develop flow charts or a process document to which each municipality can refer.</li> <li>• Proponents are often confused about which ministry provides which approvals.</li> <li>• Need to have clear, concise information available digitally. It would be beneficial to have the various ministries working with each other to streamline the process - a process that would give the proponent a single point of contact for multiple applications.</li> <li>• Proponent organizations, specifically not for profits, need a short list of qualified professionals with a good track record of doing their jobs that developers could go to for help speeding up the timeline.</li> </ul>



THEME	SUMMARY OF RELATED COMMENTS
 <p><b>Ensure permitting process information is available and easily accessible</b></p>	<ul style="list-style-type: none"> <li>• The information needs to be published and easily accessible.</li> <li>• It is not clear where to get information on what is needed for permitting. There is no champion in government helping builders navigate the system.</li> <li>• YouTube videos or other types of tools should be used to help guide and coach proponents through the process. These would be easily accessible to proponents.</li> <li>• There needs to be qualified people with knowledge of the processes who can answer builders' information requests in a timely manner.</li> </ul>
 <p><b>Train municipalities on the provincial permitting process so they can clearly communicate requirements</b></p>	<ul style="list-style-type: none"> <li>• Developers often find out what is needed as a heads up as part of the application or rezoning submission to the municipality, but the interaction can vary wildly between municipalities.</li> <li>• There should be a primer for municipalities on what is needed so they can inform/ advise developers. Municipalities need to provide tailored guidance to developers and not just tell developers about every possible permit or approval to cover their bases.</li> <li>• Most developers start the permitting process with the municipalities or their consultants. Often developers learn about the provincial permitting requirements when the municipalities refer them to the Province. The onus is on the municipalities to identify what is needed by the Province.</li> <li>• It would be ideal to have municipal and provincial representatives attend a project kick-off session early in the project's development.</li> <li>• Municipalities need some education about the process. They should not be telling proponents late in the game about additional permits or consultation requirements with First Nations. This information needs to be shared early in the process so the proponent can arrange to meet the requirements. When it is raised late in the game, it delays the project and results in cost escalations.</li> </ul>
 <p><b>Clarify when and how engagement should occur (e.g., First Nations, public)</b></p>	<ul style="list-style-type: none"> <li>• If there were a means to reach out to First Nations early in a project's initiation, it could build success quickly. Developers need to get used to opening that dialogue with First Nations without over taxing staff. First Nations will need support to hire more staff to keep up with their larger workload if they are involved in discussions about site development.</li> </ul>

THEME	SUMMARY OF RELATED COMMENTS
	<ul style="list-style-type: none"> <li>When starting an approval, developers are not encouraged to engage with First Nations until a consultation is triggered by the Water Sustainability Act. The engagement with First Nations is directed by the Ministry of Indigenous Relations and Reconciliation (MIRR). It's unclear when the First Nations will see the application. It is also not the full application package that is referred to the First Nations, but more an executive summary. Usually, it is when a developer has a site walk with the First Nations that the critical conversations start.</li> <li>First Nations are not always responding to requests for consultation. They can be overwhelmed with the number of referrals.</li> </ul>
 <p><b>Establish reasonable, fair, and transparent timelines and monitor and report on progress</b></p>	<ul style="list-style-type: none"> <li>It takes many people a lot of time to prepare an application and it is a huge risk for developers to take on when they have no certainty on approvals or timelines. The costs of carrying projects with long approvals is hard on smaller companies.</li> <li>The Province needs to add more detail to the status of an application to help better forecast timing for approvals.</li> <li>There seems to be no vested interest from the Province in builders' success and no willingness by the Province to work with industry on a timeline aligned with industry needs.</li> <li>There needs to be a change in culture in the public service to get things done in a reasonable timeframe. Metrics are going to be particularly important for how things are set up and measured for success.</li> <li>The length of time to reach a decision is less important than clear communication about the timeline so builders can plan. Transparency is important, and the Province should work towards best practice in reviewing and deciding on applications.</li> <li>There needs to be an accountability component to the process. The Province should implement Key Performance Indicators (KPIs) to measure timelines for staff members in reaching a decision, e.g., how long does it take to get an archaeological permit? Applications need to be tracked and data from KPIs should be publicly available.</li> </ul>

THEME	SUMMARY OF RELATED COMMENTS
 <p><b>Establish clear and fulsome application requirements</b></p>	<ul style="list-style-type: none"> <li>• Forms should be clear, succinct forms and easy to complete, which would help ensure application is made at the same time for all permits required.</li> <li>• Remove ambiguity in the applications. The Province needs to build a system that holds staff accountable for making the decisions within the system. The process cannot feel “made up”/ arbitrary and where builders do not feel like they can be successful.</li> <li>• Remove unnecessary requirements such as owner builder restrictions.</li> <li>• A suggestion would be for the Province to include examples of applications filled out perfectly for demonstrations purposes with builders. There should be a checklist.</li> </ul>
 <p><b>Establish consistent direction and rules and ensure clarity on role of decision-makers</b></p>	<ul style="list-style-type: none"> <li>• Provide clearer legislation, or clear direction regarding the interpretation of legislation, so that provincial ministries need to have fewer interpretation bulletins/ policy directives.</li> <li>• Provincial departments are siloed and often have conflicting direction/ rules. There needs to be a breakdown of the silos, and staff need to work together to sort through regular applications to understand where directions/ rules might be in conflict or inconsistent.</li> <li>• We need to reduce having the Province re-doing work already done by consultants or engineers.</li> </ul>
 <p><b>Use reasonable assessment criteria to reduce the “grey area” for interpretation</b></p>	<ul style="list-style-type: none"> <li>• Consider more exemptions to these permits, when practical and applicable.</li> <li>• There needs to be clear guidance on what is and is not acceptable. Historically, disturbed sites need clarity. There needs to be best practice. This would reduce timelines by a couple of years.</li> <li>• There are instances where First Nations seek additional archaeology work or challenge archaeologists as having a conflict of interest. It adds delays to completing studies, and costs time and money.</li> </ul>
 <p><b>Reduce application processing delays caused</b></p>	<ul style="list-style-type: none"> <li>• Builders routinely get applications coming back asking for more information. It is rare to get one through without at least one round of revisions and this continues to add delays to building.</li> <li>• There is the sense things are paused when further information is requested, but not necessarily that you are sent back to the beginning. As sites become more complicated, we are now doing more joint submissions and it is not as simple as it once was. It is</li> </ul>




THEME	SUMMARY OF RELATED COMMENTS
<p><b>by incomplete information</b></p>	<p>more likely there will be more missing details or follow-up required. How can we be more collaborative? Cultural shift needed from gate keeper to partner.</p>
<div data-bbox="207 401 302 491"></div> <p><b>Reduce wait times by incorporating concurrent approval opportunities</b></p>	<ul style="list-style-type: none"> <li>• Clarify requirements and ensure processes can be completed concurrently.</li> <li>• If there were a way to overlap some of the permit approvals, it would help get to construction faster.</li> <li>• The Province will not review an application until the federal government has rendered its decision (e.g., water approvals). The same happens at the municipal level. Much time would be saved by allowing processes to run in parallel.</li> <li>• Ensure the provincial process is clearly linked to the municipal process to avoid having multiple agencies requesting the same thing from proponents.</li> </ul>
<div data-bbox="204 873 354 953"></div> <p><b>Encourage a collaborative approach between the Province and housing partners</b></p>	<ul style="list-style-type: none"> <li>• A culture shift is needed so the Province sees itself as a partner helping to deliver assets to communities.</li> <li>• We need more positive interactions with the builders that demonstrate the Province's willingness to work with them.</li> <li>• We need a culture where provincial staff work with the builder to complete the necessary permits by helping to fill out what information they already have and asking the builder for only the "net new" needed for the additional permit.</li> <li>• The Province needs to communicate better about the process, the timelines, and about whether there is an issue with the application.</li> <li>• There is too much jargon in the applications.</li> </ul>
<div data-bbox="217 1367 308 1491"></div> <p><b>Incorporate a navigator role to champion the process and support proponents</b></p>	<ul style="list-style-type: none"> <li>• Other jurisdictions have a champion or concierge who helps builders navigate the process. Those builders have a clear understanding of the expectations and are provided realistic timelines for when they can expect a decision.</li> <li>• Rather than the applicant tracking down permissions separately from each ministry, it would be simpler for applicants to work through a single point for provincial housing approvals.</li> <li>• Some municipalities run a project kick-off session to map out the permitting process. It would be helpful to do this with the Province.</li> </ul>


THEME	SUMMARY OF RELATED COMMENTS
 <p><b>Implement a single application approach and utilize tools like autofill</b></p>	<ul style="list-style-type: none"> <li>• BC Hydro timelines are impacting the ability to build housing. Participants indicated that they should be part of a single-window process.</li> <li>• The process of creating a single approach must be transparent.</li> <li>• Perhaps there needs to be an initial application process which is an easy template that gets you into the queue and then the roadmap is developed for the type of project you are proposing.</li> <li>• For the single window for housing, consider developing multiple platforms. There are various groups navigating permitting, and each sector participants have various levels of understanding and access to digital tools. Some participants might still want in-person or on-the-phone support and not all through a technology platform.</li> <li>• Even auto-filling information already provided in the application for the next permit is helpful.</li> </ul>
 <p><b>Develop geospatial tools to inform development constraints</b></p>	<ul style="list-style-type: none"> <li>• Developers need data and plans that outline key land attributes such as known archaeology areas or steep slopes. This would help developers screen a site for these key triggers for approvals.</li> <li>• Developers would benefit if municipalities had an application platform where querying an address provided the layers of permitting requirements. This could also be done at a provincial level (e.g., you are in a flood area and need a certain permit).</li> </ul>

## PRIORITIES

Priorities identified by respondents for the Province's consideration when improving the provincial permitting process included:

THEME	SUMMARY OF RELATED CONTENT
 <p><b>Provide resources to improve timeliness of decisions</b></p>	<ul style="list-style-type: none"> <li>• More staff are required to review the applications and approve permits.</li> <li>• Assigning a concierge or navigator is good idea, but staff must be able to communicate in a clear, consistent, and timely way and filter out the content not applicable to the project at hand.</li> <li>• There needs to be an appropriate process and timeline that better supports not-for-profits and their roles in creating housing.</li> </ul>

THEME	SUMMARY OF RELATED CONTENT
	<ul style="list-style-type: none"> <li>• Levels for the volume of applications to be processed is a great benefit to every organization. The concept of quick turnarounds, clear, concise communication, and keen customer service creates an atmosphere that assists projects to move forward.</li> <li>• The process will be faster when middle managers are given more decision-making authority.</li> <li>• There are too many referrals going to First Nations without the resources to review them.</li> <li>• Vacation coverage is key. A two-week delay when a staff member is away is significant for a developer. There needs to be knowledge transfer or some other mechanism to keep the process moving through the process when staff are away.</li> </ul>
 <p>Establish a triage system or prioritization of applications</p>	<ul style="list-style-type: none"> <li>• Formalizing a triage process for applications could lead to big gains.</li> <li>• Once an application is submitted, developers should have the opportunity to go through it either by an interview or in person. This way, the developers would know early if they have done their due diligence. Right now, applicants do not know what they are missing and may not be told for months.</li> <li>• Some permits are delayed as issues get hammered to death. If the goal is to increase the supply of affordable housing, then all levels of government need to review applications with this lens and triage them accordingly.</li> </ul>
 <p>Address review delays by establishing transparent timelines</p>	<ul style="list-style-type: none"> <li>• It would be helpful for industry to have a general projection on the timeline and an update at each step. There needs to be clarity and transparency upfront on the timeline, tracking, and communication to applicants. Then applicants would not have to initiate follow up with staff.</li> <li>• The priority should be on clearly defining the application review milestones and service commitments (e.g., timelines).</li> </ul>
 <p>Increase education and information sharing with the sectors</p>	<ul style="list-style-type: none"> <li>• Clear expectations - and clearly communicating those expectations - is a priority. The more the developers understand what is needed the better they can provide it.</li> <li>• It is important all sectors and those working in the sectors be educated on the housing permitting process and requirements.</li> </ul>

THEME	SUMMARY OF RELATED CONTENT
 <p>Build a foundation of trust</p>	<ul style="list-style-type: none"> <li>• The Province needs to stop reviewing the work of qualified professionals.</li> <li>• The approval system must be built on trust. The Province needs to work with builders and contractors and recognize those who are fair, open, and transparent with the process. Eventually the process will weed out those who do not belong in industry. The process should facilitate rather than punish.</li> </ul>

## 5. ADDITIONAL ANALYSIS

As noted earlier, housing stakeholders prioritized the following areas for improvements to the permitting process.

- *Provide resources to improve timeliness of decisions.*
- *Establish a triage system or prioritization of applications.*
- *Address review delays by establishing transparent timelines.*
- *Increase education and information sharing with the sectors.*
- *Build a foundation of trust.*

In addition to these priorities, the following overarching observations emerged from the engagement.

### *Support for the Provincial Housing Strategy*

Housing partners endorsed the Province's strategy to create a single, co-ordinated approach for obtaining provincial housing permits. They welcomed the Province's plan to establish a navigator service to help proponents through the permitting approval system and the Premier's commitment of providing new full-time staff to address application approvals.

The Province's decision to create the new Housing Action Taskforce was also favourably received. There was agreement by the housing partners for the need to have the ministries work together to find opportunities for streamlining applications and improving the timeliness of decisions.

However, given housing partners routinely use qualified professionals for the completion of the permitting applications, they did not offer many comments on the use of a single-application approach for permitting.

### *Collaboration between the province and all housing partners*

Both government-assisted and market housing are required to meet the needs of all British Columbians. To increase the rate at which housing is developed, all profit and non-profit organizations must be able to quickly move through the housing permitting process.

The Province should continue to seek to better understand the permitting experiences of both private sector developers and not-for-profit organizations. Housing partners indicated an interest in ongoing engagement with the Province and a desire to build a relationship of trust. Working in collaboration, the housing partners and the Province could better identify barriers and opportunities to streamlining the permitting processes.

Housing partners also recognize the key role of municipalities in housing permitting. While the Province is focused initially on addressing its permitting processes, housing partners raised the need for a review of the entire housing permitting process across all levels of government to identify opportunities to streamline processes, remove duplicative approvals, and improve coordination.

#### *Immediate need for affordable housing*

Housing partners identified the need for a different approach by the Province in reviewing projects to achieve the objective of all B.C. citizens having safe and affordable housing. To meet citizens' housing needs, it is important to incent the right supply. For example, affordable rental housing and co-ops and housing for off-reserve Indigenous people are the most in demand.

Housing partners suggested the Province consider taking a risk-based approach to expedite minimal risk projects. As well, the Province should prioritize affordable housing needs and apply this lens to projects when determining risks and public interest.

#### *Clarity and certainty to advance projects*

Many participants noted the importance of understanding, early in a project's development, the permitting path, and associated timelines. This information is critical to making business decisions and addressing the funding and scheduling elements of the project. Timelines should be established and communicated to housing partners. Participants indicated that it is critical the Province take steps to commit – and adhere - to timelines.

#### *Engagement of qualified/technical professionals*

There were similar findings between the engagements with the housing partners and with the ministries who play roles in housing permitting. Both groups noted that there are regional inconsistencies in referrals from municipalities and the requirements for consultations. Both groups acknowledged often applications are overly complex and Indigenous consultation can be particularly complex with many unique/individual processes. As well, both groups noted that the level of information needed by statutory decision-makers can be extensive. This fact often leads housing partners to rely on qualified professionals which can be in short supply and costly for non-profit organizations.

From the internal engagement, it was clear that the quality and completeness of submissions plays a significant determining role in the timeline for getting approval decisions. Through both engagements, participants highlighted the need for clear expectations for the applications. Given housing partners often rely on qualified professions for completing their projects' applications, the Province may consider undertaking direct engagement with this network to discuss their experiences and seek their input to the single application concept.



## 6. Appendix A – Interview Data

### PRE-APPLICATION

Pre-Application is the process in which a proponent / home builder will seek to understand the potential permits required for their development project and undertakes engagement with First Nations and municipalities.

Respondents were asked to identify areas where there are challenges and/ or issues relate to the Pre-Application phase of the Permitting process. Specifically, respondents were asked:

- What do you do today during the pre-application phase?
- What is or is not working for you today?
- What aspect of pre-application is meeting your needs?
- What challenges have you experienced in the pre-application phase?
- What practical solutions would make pre-applications more straightforward and transparent? (i.e., when you are preparing to submit to the government).

### Canadian Home Builders Association BC

- Most developers start the permitting process with the municipalities or their consultants. Often developers learn about the provincial permitting requirements when the municipalities refer them to the Province. The onus is on the municipalities to identify what is needed by the Province.
- Qualified professionals will not necessarily know everything about the permitting requirements, but they are willing to find out. The challenge is that it can be difficult to find the information to guide clients. The information needs to be published and easily accessed.
- Developers/ builders are not getting particularly good direction from most municipalities and the level of information provided varies between municipalities. The information is not necessarily comprehensive, nor does it provide a clear roadmap of the process. They do not provide a checklist of things to think about. Municipalities often identify everything just to be fulsome in their response – but this can lead to increased timelines as developers sort through all the various potential approval requirements and determine what may or may not be necessary to the situation.
- Developers are changing their design just to avoid provincial housing approvals. In some places these provincial permits could increase timelines by a year, and often for seemingly trivial things such as requiring a new set of approvals for depth of a fill).
- Hard to justify a definition to a developer (e.g., that is a stream) when it is going to cost them money. There are too many hoops you then need to go through as a developer because of things being defined a certain way.
- Municipalities' official community plans sometimes enshrine requirements that must also be addressed.
- Developers need data and plans that articulate key land attributes that can be triggers for approvals (e.g., known archeology areas or steep slopes). This would help developers to be able to screen a site against some of these key triggers. For example, for some culvert decisions if the

depth is less than two metres of fill it can be a 45-day approval. If a different depth, could trigger a provincial approval which can be up to two years to obtain.

- Developers would benefit if municipalities had an application platform where you put an address in and it gives you the layers of permitting requirements. This could also be done at a provincial level (e.g., you are in a flood area and need this kind of permit).
- Developers often find out what is required as a heads up as part of the application or rezoning submission to the municipality, but the interaction can vary wildly at any given municipality. Some may give detailed potential concerns however it is probably time intensive and not very scalable to all municipalities.
- Some municipalities host a pre-consultation meeting in which they provide a comprehensive list of planning considerations. There does not seem to be a standardized list though for municipalities. There needs to be a primer to municipalities on what is needed so they can inform/ advise developers. Municipalities need to provide tailored guidance to developers and not just tell developers about every possible permit or approval as a means of covering their bases.
- The need to apply for provincial approvals is often touched on in writing by municipalities, but that is not necessarily consistent or uniform from one municipality to the other. Much comes from in-person contact and will be offered one piece at a time leading to " ... thanks, but you will also need this ...". All of these asks for permits impact the developer's ability to make informed decisions on which projects should be put on the back burner. It would be beneficial to know what and how many permits are needed when choosing which projects to go ahead with.

## Developers and Builders Associations

Note BCCA talked to members including a call with northern builders to gather input for the session.

- The number one issue impacting the ability to build housing is the timeliness of BC Hydro. They should be part of a single-window process.
- There is a lack of clarity on where to get information on what is needed for permits. It feels like a black hole (i.e., limited to no insight into what is happening) when trying to get the direction needed. There is no champion in government helping builders navigate the system.
- There needs to be an internal concierge or navigator that supports builders and constructors through the permitting process as they are already so busy.
- Some people have worked in other jurisdictions who have a champion or concierge person who helps them navigate. Those builders had clear expectations on what they needed to do and realistic timelines where if they provided the information, they could expect a decision. That is what we also want.
- Too often builders find out late in the process there is more information needed.
- There seems to be no vested interest from Province in builders' success and no willingness by the Province to work with industry on a timeline aligned with industry's needs.
- Concierge or navigator (one contact point) concept is a great idea.
- Provincial departments are siloed and often have conflicting direction/ rules. There needs to be a breakdown of the silos and staff need to work together to sort through regular applications and understand where directions/ rules might be in conflict or inconsistent. For example, for Water Act approvals, there are differing standards between municipalities and the Province and differences in messaging intent.
- The process of trying to create a single approach must be transparent.

- There needs to be clarity. This is the single most important aspect of this endeavor.
- A lot of members on the contracting side will get involved towards the end of the provincial permitting phase/ process. That is when you will see design take off and larger challenge of dealing with municipalities and BC Hydro.
- What has worked well in other jurisdictions is a partnership approach to collaborating with industry with a focus on the benefit of the project. Businesses feel other jurisdictions have government departments more willing and interested to work together to help developers through the approval process. In B.C. there seems to be a tension between ministries on approvals and that is not collaborative. In Ontario, an example was given that someone in the municipality was working with the builder to navigate the provincial process because the municipality wanted the project.
- A culture shift is needed in the Province where the Province sees itself as a partner helping to deliver assets to communities.
- There is information on the permitting process available online, but more is needed.

## BC Housing

- Most projects are on land in urban settings (renewable projects). The usual first steps are to connect with First Nations and engage with municipalities to verify against the official community plan and identify transportation issues. Where things get muddy is the environmental scan of permits needed from Province. Having a workflow would be extremely helpful.
- Proponents need a place they can go to find out the steps they must take. The BC Housing Association has created its own checklist.
- There should be a portal where new or inexperienced people can find out the process and get the information they need. Right now, there is nothing formal to say if you have done everything.
- Municipalities need some education on the process as well and they should not be telling proponents late in the game about additional permits or consultations requirements with First Nations. This information needs to be shared early in the process so the proponent can handle the requirements. When it is raised late in the game, it delays the project and results in cost escalations.
- When it is a formal duty to consult where we follow a process through the Ministry of Citizens' Services (CITZ). They provide clarity on what the road map is, what you are to do, what the test is, what the bar is to meet.
- A lot of the mystery still as to what do we need permits for and what are the turnaround time expectations. The provincial process seems nebulous. It would be helpful for project leads to understand the permitting process so it can be integrated into the other aspects of the project and overall project management plan can be developed.
- An acceptable time is completely contingent on the quality of the submission. So, understanding what makes a quality submission is important and then a clear map on the timeline – six to eight months might be reasonable, but it depends on its level of complexity.
- There should be clarity with provincial staff that when doing a site alteration permit, proponents cannot do any other due diligence on site such as geotechnical while they wait on an archaeological permit.
- Waiting 12 months for a permit is a long time. If there were a way to overlap some of the permitting, it would be beneficial to getting to construction faster.

- BC Housing has mapped the development milestones and what is needed from the municipalities. It would be great to map provincial permits into that too. Having a timeline or better understanding of timing would be critical to do that work.

## Municipalities

### Availability of information

- Need to have clear, concise information available digitally. It would be beneficial to have the various ministries working with each other to streamline the process. A process that would allow the proponent with one point of contact for multiple applications.
- Proponents often identify they do not understand the process, so information available via websites is not helpful.
- It is very unclear when proponents require permits from various provincial institutions and difficult to navigate who they need them from. There are numerous agencies required for Crown land tenure applications.
- Proponents are often confused about which ministry provides which approvals.
- Provide a user guide. This gives municipalities an understanding of the hierarchy and organization chart, so we know who to talk to if there are issues, for dispute resolution.
- There is too much authority placed on the technical staff, and there can be significant differences in how permits are reviewed from one “decision maker” to another. Local government has the responsibility to meet the requirements of permits, but Provincial technical staff have the authority to delay or block projects. There needs to be a better match of responsibility and authority. Provincial staff need to have ownership in being a partner in the process to achieve successful projects, including meeting schedules.
- Ensure there is a clear list of contacts for various ministries that can be shared with proponents to reduce barriers. Recommend that the Province participate and are willing to engage through the permitting process to facilitate more appropriate assurances through to the proponent (e.g., not simply emailing reference to a book standard without including/ offering a more fulsome discussion on the matter or provide alternate solutions).
- Direct access to staff who are qualified to answer questions.
- Consistency. It adds time and confusion when staff need to learn a separate process and sign up for a new account for each different referral.
- Staff capacity needs to respond to public inquiries and to be reflective of the demand. Often a quick phone call or email chat can help applicants get on the right path. It can help reduce frustration and demands on staff for processing as applications can be submitted correctly.
- Annual or bi-annual updates via formats such as conferences (Building Officials’ Association of BC or the Planning Institution of BC) can assist with the municipal partners receiving and understanding changes at the provincial levels. This can assist us with conveying the information back to proponents as we are the first point of contact while projects are in the beginning of the development and planning stages. Customers with better understanding and knowledge of what is required during permitting stages can supply more thorough applications and avoid lengthy delays that can result from applications that come in piece by piece.

### Staffing

- There are challenges due to time delays because of staffing issues. Difficulty talking to appropriate provincial staff person to ask questions.

- We have a good working relationship with existing staff (Ministry of Transportation and Infrastructure (MOTI), Ministry of Environment (MOE)), but they are clearly understaffed, and it is difficult to receive a timely response to inquiries across the board.
- Our Regional Agricultural Advisory Committee just passed the following resolution:  
That applications relating to the approval of Farm Worker Housing be given priority to support farm operations and request that the Agricultural Land Commission hire additional staff to assist with the timely processing of all Agricultural Land Commission applications.
- It would be good to see an organizational chart that is accessible and up to date, as there does not seem to be any clear way to escalate discussions. There can be a lack of focus on “adding value” and too much focus on checking boxes. It is often difficult to get people on the phone to talk about issues and resolve problems.
- Proper staffing levels for the volume of applications to be processed is a great benefit to every organization. The concept of quick turnarounds, clear concise communication and keen customer service creates an atmosphere that helps projects move forward. Higher levels of approving authority at middle levels of management also help expedite processes.

### Timelines

- The length of time it takes for a response is too long.
- Most proponents face uncertainty with timelines/ clarity in the permitting process and who/ which ministry is responsible for administering which permit (e.g., when FLNRORD was split into FOR and WLRS). Proponents indicate that the processing times for permits are very long which leads to unforeseen delays in their project.
- Very slow processes sometimes for simple permits, and staff turnover can add to review/ approval times (e.g., needing to explain things all over again).
- We receive reports of proponents having difficulties making appropriate contact with a Provincial representative (e.g., they cannot find a phone number online, so submit an email and receive automated "do not reply" email.) Also hear concerns with extended timelines and delays and/ or conflicting comments caused by gaps between provincial departments regarding referrals (e.g., Contaminated Site Regulation (CSR), Agricultural Land Commission, MOTI, MOE).
- The system for issuing heritage alteration permits needs overhaul. There seems to be lack of timeliness, oversight, and leadership from the provincial permitting process on this.
- The provincial review/ approval process for Riparian Areas Protection Regulation reports is currently still frustratingly long (around six months), which is causing delays for developers.
- Increasing timelines for approvals related to site contamination. Approvals that only took a few weeks or a month or two not too long ago are now taking six months to a year.
- MOTI subdivision approval timelines are severely impacting applicants (minimum six months for preliminary layout approval), as are Agricultural Land Commission application timelines for housing related applications (approx. 10 months for decisions). Agricultural Land Commission requirements for soil and fill applications for accessory dwelling units are unnecessary burden when regulations could allow for this.
- Water licenses are backlogged, even though they are now trying to prioritize affordable housing projects.
- For archaeological/ heritage permits it can take up to a year to get a permit to allow an archaeologist to start searching for artifacts. This should be much quicker, as there are huge costs associated with such significant delays.



- The process to obtain a groundwater permit is too slow and onerous.
- More resourcing to the Agricultural Land as processing times are very slow and it is very difficult to receive a response to questions. Also takes a long time to receive responses to MOTI referrals and Water Sustainability Act applications.

### Things that are working well

- The electronic Development Approvals System (eDAS) for Provincial referrals is working well as they allow for tracking of files by the appropriate Regional District Staff.
- MOTI staff have recently been more responsive.
- MOTI has held status meetings with Planning and Engineering staff regarding large projects which we have found very helpful in the past. Having these status meetings has helped reduce the uncertainty with the permit approval process. MOTI also has very clear submission requirements and is very transparent about what information is required. On the natural resource side, having a single portal to submit applications (FrontCounter BC) is helpful.
- The clearest process is the MOTI where there are clear areas that are identified on when and where they get involved - zoning 800m, abutting sub or access permit.
- Once we receive the approvals from the applicable ministries, they are often quite clear and easy to read and interpret.
- Liquor and Cannabis Regulation Branch (LCRB) online application and referral platform.
- Ministry staff reviewing Riparian Areas Protection Regulation reports have been very quick to provide helpful responses to inquiries.
- Staff recently spoke with someone from FOR regarding a permit that has been in process since July 2021 who was very helpful and took ownership of helping – this makes a huge difference (i.e., someone taking ownership and adding value and serving the public).

### Approval authorities

- Eliminate the provincial process and let the land use policy makers in local government make land use decisions. The Province should not be involved.
- The Province should turn the approval process over to local governments. There is support from staff for doing this.
- Local governments determine most land use policies. Let them do the approvals.
- Some local councils are adding more and more hurdles and unreasonable costs in a concerted effort to stop all development.
- Let the local governments which set land use policies have the authority to make land use decisions.

### Opportunities for alignment and clarity between municipal and provincial processes

- Improved communication between provincial and municipal governments.
- It should be a team approach with the common goal of serving the public. The Province needs to ensure regulations are met but needs to also be a partner in getting things done. At a time when municipalities are taking all the blame for approval timelines the provincial referrals are taking longer and longer.

- Priority should be placed on consistently developing relationships with municipal departments to discuss challenges, opportunities, and proposed solutions before implementing something that may not work or may have minimal impact. We welcome and encourage further discussions.
- Close the gap between responsibility (downloading to local government), authority (provincial approval requirements), and budgeting. Give local government the money and authority, and we can do a better job.
- Consistent information sharing, regular updates to changes at the provincial level that is easy to read and find. Think of a good book with a precise table of contents and index for reference or an easy to search web page with hyperlinks to that work. The new building code lost the ability to click on links to other sections referenced within the body.
- Clear regulation! Multiple interpretations from the different provincial staff make it hard for our staff to relay requirements.
- Clear and direct linkages for the municipality to refer projects to with expedited and clear responses.
- Cross referencing between two areas. Often there is familiarity with one or the other, but limited understanding of how they overlap or are complementary.
- Align goals shared by both the Province and municipality such as addressing the housing crisis by making more lands available for development within the Agricultural Land Reserve, particularly for those areas with little agricultural value.
- Stop adding more requirements and approvals that are required before building permit issuance. Obtain these requirements/ approvals earlier on in the process (subdivision stage).
- Understanding what permits are required and what the response times are expected to be so we can plan. A review of the Local Government Act should be considered to determine if there can be efficiencies gained by granting local governments more authority for delegated decisions such as Riparian Areas Protection Regulation approvals.
- Support municipalities by providing more communications and engagement with complex regulatory changes e.g., heritage conservation and archeology.
- Create a single online platform for all referrals.
- One point of contact for gathering information or presenting questions (e.g., when signing up for email from the Province, make it a single form where multiple types of information boxes can be selected, rather than having to sign up with each ministry individually).
- If it were one provincial approval needed (that covered the whole range of ministries), it would be easier for applicants. Often municipal approvals are all handled through one or two contacts at the regional district (one person in planning/ zoning, and one person in building/ codes), whereas some developments have many provincial contact points in addition to the municipal ones, leading to confusion on where certain requirements or conditions are coming from.
- FrontCounter BC has worked well for the environmental/ natural resource ministries as one point of contact. Could this be implemented for other areas?
- Agricultural Land Commission regulations particularly around soil removal and deposit limitations.
- Engage FOR and Agricultural Land Commission to do their own enforcement.
- Riparian Areas Protection Regulation notifications.
- Contact applicant letting them know of wait time.

### BC Non-Profit Housing Association

- We do not have a visual roadmap or timeframes for the housing permitting process.
- We need a checklist or something like a checklist to understand the steps.
- Every time we finish a permit process, we find there is another permit requirement.
- While waiting for one process to go through, a ministry decides on another project which can then affect the application requiring amendments and results in delays.
- Staff changes have been detrimental to the timing of processing. There are knowledge transfer challenges and often the proponent needs to provide historical information to new staff. New people do not always have a good trail of paper to rely on from predecessors. Major things can change on a project affecting applications (e.g., MOTI changing road access).
- Grandfathering applications against new decisions while waiting for approvals would be helpful.
- Obtaining consultants' time to support non-profits can be difficult. Sometimes projects wait 10 months for consultants for even a small project.
- Municipalities often flag the issues that need provincial applications. But there is a lack of consistency in how ministries are engaged.
- One of the most challenging areas is when there is an archaeological issue on MOTI land.
- Need alignment with municipality approvals.
- Affordability housing projects do not have the resources or funds to always provide the engineering/ expert information that ministries seek (i.e., engineering drawings). The projects are shoe-string budgets and rezoning is often required to get funding for the project.

### Aboriginal Housing Management Association

- All Aboriginal Housing Management Association members are housing providers for Indigenous people not living on reserve. About 75 percent of Indigenous people in B.C. do not live on reserve lands.
- Those working in non-profit organizations tend to hire a development consultant. Most projects are typically housing builds on non-reserve lands.
- Usually use contractors to lead the development of the application. It seems the municipal permitting is slower, and we are waiting on them.
- There can be challenges with undertaking consultation with First Nations especially when there is archaeology work. It is not always clear whose traditional territory the project is on. Non-profits sometimes need clarity on which First Nations to contact.
- There is a capacity issue with First Nations with some Nations indicating it will be over a year before they can review projects.
- The engagement with First Nations is not happening early enough. A company will go in with an archaeology company and their methodology may not align with the First Nations. There needs to be better communications between First Nations, municipalities, and companies.

## APPLICATION CREATION

Application creation is the process in which a proponent / home builder will create formal application(s) for a housing project as part of seeking the necessary permits.

Respondents were asked to identify areas where there are challenges and/ or issues relate to the Application Creation phase of the Permitting process. Specifically, respondents were asked:

- How much effort and specialized skill goes into creating housing applications?
- What is or is not working for you today?
- Which aspects of application creation meet your needs (e.g., websites, guidelines, accessibility, contacts within ministries, level of knowledge)?
- What challenges have you experienced in the application creation phase?
- What practical solutions would make application creation more straight-forward and transparent?

### Canadian Home Builders Association BC

- A challenge in the application process is the Province wants engineering diagrams which are only completed when construction is ready. At this stage for making decisions, 30 percent engineered diagrams are all that is needed, however FOR wants the more detailed engineering diagrams. It could save developers up to 50 percent the cost of getting a decision if 30 percent engineered diagrams were accepted by the Province. Asking a client to pay for a complete design before there is any certainty of approval is an unreasonable expectation.
- Provincial staff need a clear understanding of their role. Developers have lost time on projects because provincial staff are questioning engineering or consultants' work. Is the provincial staff's role to approve permitting decisions or are they to override the work being done by consultants?
- Years ago, there was a change in the Water Sustainability Act, with the unintended consequence that things that used to have 45-day approvals became two-year approvals. For example, culverts are now judged against habitat considerations. We need to get back to reasonable assessments and focus on the 45-day approval process versus the two-year approval. Not everything needs to be treated like a fish-bearing stream versus a road-side ditch. One point of note, there has been some move forward and clarification on streams and ditches, corridor, and drainage exceptions. There are some differences in how those are triaged now.
- The Schedule 10 Short Term Water license and requirements under the Water Sustainability Act are slowing down projects. There is no certainty on whether you will receive a short-term water license. There is a cloud of uncertainty which has huge issues for construction and huge ramifications on project schedules.
- It takes a lot of people a lot of time to put together an application and it is a huge risk for developers to take on when they have no certainty on approvals or the timelines. The costs of carrying projects with long-approvals is hard on smaller companies.
- There could be huge gains to be made by formalizing a triage process for applications. Once the application is submitted developers should have a chance to go through application in an interview or in person. This way the developers would know early if they have done their due diligence. Right now, applicants do not know what they are missing and may not be told for months down the road.
- There needs to be a change in culture in public service to get things done in a reasonable timeframe. Metrics are going to be particularly important for how things are set up and measured for success. Municipal and provincial staff should be paid bonuses based on their ability to get stuff done. This would encourage staff to complete work where there is currently little incentive.
- We need a short list of qualified professionals with a good track record of doing their jobs that developers could go to help speed up the timeline.
- We need to reduce having Province re-doing work already done by consultants or engineers.

- As part of pre-application, developers do not engage with ministry staff, but they do have direct conversations with Indigenous groups about archaeology components. Otherwise, it has always been through the municipality or relevant consultants, where appropriate to get guidance and support.
- Checklists for each municipality would help developers know what they need to look for and contacts for information.
- It would also be helpful if key attributes that were a decision point were available by GPS to inform developers from the start of considering a project's site.

### Developers and Builders Associations

- There have been comments from several contractors that they never really understood the complete housing permitting process. No one is showing contractors how to take accountability. The process cannot assume contractors know everything.
- Have heard from contractors that they stay away from residential construction because of onerous processes, and they cannot be bothered with it. We need more of them in this realm, need them to be interested. We need contractors to build housing, so we need to help them with a roadmap and a collaborative approach with the Province.
- Contractors can complete the responses required on the application. However, there are increased layers to the information requirements. Often requests for further information are the result of secondary requirements not identified upfront. Everyone is busy so information requirements should be clear and fulsome upfront.
- It is frustrating to be told after you think you have completed the application that more is required, and you do not hear that further information is required until months later. These delays are costly to the builders, and it makes the process onerous.
- Contractors tend to hire consultants because they cannot afford errors or omissions in their applications. It takes so much time to prepare the applications and to get responses, so no one wants any setbacks that force the application to go back to square one. Contractors cannot afford the risk of time delay, so they invest instead in consultants which drive up the costs of the projects.
- It seems like requirements in the application process are being “made up” by provincial staff. Industry follows the instructions very carefully yet there seems to be that provincial staff have different interpretations and expectations from instructions. There needs to be clarity.
- Remove the ambiguity in the application. Remember contractors have teams to support their proposals to get to the project phase. Contractors and consultants have the necessary knowledge and sophistication to complete the applications. The Province needs to build a system that holds staff accountable for making the decisions within the system. The process cannot feel “made up”/ arbitrary and where builders do not feel like they can be successful.
- The Province needs to focus on whether the project is viable or not.
- There is a delay in the approval process when staff are away (e.g., vacations, leave) and this has a significant impact on industry's timelines for getting permits. Staff filling in need to be educated on the file before industry can get the approvals. There needs to be more knowledge transfer when people are not there (e.g., vacation, leave).
- Develop service standards for applications based on value. There seems to be no differentiation in scale/ importance of applications (e.g., the comparison an individual who applies for his



personal bridge over the river vs a water license for a 200-unit subdivision. Both appear to be given the same weight in the system and same spot in the queue).

## BC Housing

- It is not always clear who owns what permitting authorities – sometimes it is CITZ and sometimes WLRS. The interactions with ministry staff are not formal but more organic based on who knows who in the ministries or if you are directed to the right person. Clarity on who to talk to in individual ministries would be helpful.
- Much of the work completing the application requires specialized skills and we rely on a consultant team. Often, we are told by our consultants when asking about the status of the approval that it is “blocked” or still waiting to have it moved along. There is not a champion within each ministry to make sure milestones are achieved and the application is moved on. Industry is aware this is partially due to staffing issues. There might need to be a project kick-off session where there can be a mapping of the permitting process with the Province. These types of sessions happen with some municipalities, and it is helpful.
- Love the idea of a concierge.
- It would be ideal to have municipality and provincial representatives at a project kick-off session which should happen very early in the project's development.
- For some projects Vancouver appoints a “project facilitator” to shepherd the project through the various departments to get the permits and the developers work with them. Vancouver is a special set up – usually you talk to the senior planners on the policy aspects and then once you get the project moving further, you are working with multiple departments staff. The project facilitator role in the City is the “go to” person for developers to help chase down where things are at within the departments for approvals.
- For some projects there are multiple consultants working to complete the application process. How will a single- window process work with multiple consultants that are feeding into that one application?
- There needs to be scope of what the Province needs for its regulatory requirements (depending on the application). There are multiple types of applications (small, complex, urban, rural). If it was clear what was needed for each type of application, then proponents would be able to do a better job on applications.
- YouTube videos or other types of tools should be used to help guide and coach proponents through the process. These would be easily accessible to proponents.
- Consultants can be a bit siloed with different lead times and timelines to get approvals in place. Various pieces of information we may need, may not all be available at the same time to put into a single application. Might be a double-edged sword having only one application.
- Perhaps there needs to be some sort of initial application process which is an easy template that gets you into the queue and then the roadmap is developed for the type of project you are proposing. This gets you into the provincial queue and gives a heads up to Province and then the consultants can start to work with ministries on the requirements.
- Taking a regionalization view of the application process might be helpful. Within regions, things are working well when we connect with other agencies because some issues are landscape or area based. For example, BC Housing tends to align well with the health authorities.

## Municipalities

### Clarity

- Clear and consistent requirements across the Province. Stop changing and reshuffling ministries so we have no idea where the expertise and authority are that we are trying to reach.
- Clear, succinct forms to fill out would help to ensure all permits needed are applied for at the same time (i.e., make it easy for the public to understand and fill out).
- Clarity around the requirements and ensuring processes can be completed concurrently.
- The most critical piece is clear, consistent expectations shared at the beginning of the process. It is also important the requested information be appropriate for the associated stage of the review process.
- Streamlined process for application by applicant; streamlined process for ministry staff to review, provide feedback to applicant. Provide clear direction regarding the interpretation of legislation (e.g., Agricultural Land Reserve, Riparian Areas Protection Regulation); or clearer legislation so that provincial ministries need to have fewer interpretation bulletins/ policy directives.
- Need to eliminate inconsistencies in interpretations, authority, and approval timelines. Make clear regulations with zero interpretations (flexibility comes in the exemptions).

### Requirements

- Multiple BC Building Code revisions per "code cycle" is significantly hindering development with potentially multiple code changes occurring during the design and approval phases of projects, leads to additional cost, design delays, and uncertainty for developers.
- Reinstate Administrative Guidance 6 which allowed permit freezes to be released quickly and straightforwardly without lengthy approval timelines and high costs.
- Protocol 6 pre-approval applications should be eliminated for sites for area wide fill and DW applicability and decoupled from the AIP application process.
- Consider more exemptions to these permits when practical and applicable.
- Remove unnecessary requirements such as owner builder restrictions.
- The Province to be open to proactively excluding specified Agricultural Land Commission lands within municipal boundaries to aid in housing.
- The requirement for conditional subdivision approval prior to the housing project being selected by BC Housing/ Canadian Mortgage and Housing Corporation etc. Should be changed. Or there should be a BC Housing Pre-Development Funding loan to build the road and drill the well etc.
- Requirements to satisfy provincial contaminated sites requirements are often unclear (e.g., guidance and resources are not explicit); lengthy approval process application review turn-around time; current "one-window" approach to asking questions and receiving direction from MOE staff is not customer service oriented; phone call or email could resolve matters quickly to allow work to continue. Consequences are loss of funding, delay claims, etc.
- The submissions for LCRB licences/ permits are often lacking information (i.e., the applicants are not providing comprehensive application packages and are sometimes missing critical pieces of information). Having more stringent submission requirements would be helpful so local government staff do not have to track down subsequent documentation to comment on a licence proposal.
- There have been examples of the expectations changing (e.g., add a water license permit requirement) many months after the initial submission.

- The Agricultural Land Commission approval process relating to soil deposit for house development is not reasonable or sustainable.
- New soil relocation requirements for management of non-contaminated soil will equal higher development costs resulting in funding towards housing (minimal benefit to environmental protection). This results in delays during development (i.e., project delay claims) if random contamination is discovered during bulk excavation and work needs to stop, etc.
- Email notifications of Riparian Areas Protection Regulation report submissions to the Province (even pre-review/ approval) would be helpful to local government staff, as well as a record in the Riparian Areas Protection Regulation Notification System as to when a report was approved by the Province (as sometimes the approval emails are not received or lost).
- Riparian Areas Protection Regulation Notification System does not show any applications in progress, and it would be helpful if this notification system were easier to use and understand (e.g., clearly state if a Riparian Areas Protection Regulation assessment is approved by the Province or not, and if a sign-off from a qualified professional is required at the end of the development and if one has been submitted.)
- Maps showing areas where additional permits from the Province are required, accompanied with information on what is needed to apply for the permit and which ministry is responsible would be helpful. Additionally, having a contact person/ number/ email for municipal staff would reduce processing timelines on the local government side.
- A system where a proponent can enter their address/ site and some basic information about the type of development (e.g., density, form) and the system would advise the proponent all the types of permits required, at least from the Province.
- Additional help with upgrading engineered civil infrastructure.

### Single window considerations

- A concierge or navigator service would only work if there was a reasonable expectation the application would get a timely approval, and not get bogged down in the process.
- Many proponents are non-profit societies and charities run by volunteers who need help of a concierge or navigator to help them navigate the system. The faster the approval process, the faster construction will begin. More delays equal more cost to non-profit which means the entire project will cost more in the end for BC Housing to fund.
- Local governments could designate a key planning staff person to be the one-stop shop. Then housing applicants would only have to deal with one level of government, not two.
- One stop shop that must follow all the rules.
- A single point for provincial approvals of housing would be simpler for applicants. If they were able to submit their plans to one provincial agency that could then determine and assist with obtaining any required provincial approvals instead of the applicant tracking down permissions from each ministry separately.
- Dependability and consistency in contact and who we work with.
- Handholding applicants is not the solution. Applicants need to be responsible for understanding their project's required approvals and their applications. What is simply needed is more staff to process applications more quickly, and clear transparency on current/ expected turnaround times.

- The proponent should be able to come back to the single window throughout the process to check on the status.
- There is significant concern around a "mailbox" concierge contact whereby no one responds for an extended period. There is no ability to phone someone or follow up. An immediate assignment to an individual for handling or a key account manager that oversees all "City" submissions would be preferred.
- Ensure provincial process is clearly linked to municipal process to avoid the danger for multiple agencies to be requesting same thing from proponent.
- Ensuring province wide coverage that recognizes the different paths to development and have staff that is dedicated and responsive to different areas (e.g., the Okanagan, Peace or Kootenays.) One size does not necessarily fit all.
- A single window can only be successful if it is responded to in a timely fashion by a person with either the knowledge to reply to inquiries or a person with the knowledge of whom would be the best to respond to inquiries and passing it on with a reply to the proponent in a timely fashion. The key to the best success is great communication.
- Applicants have access to a portal that shows them the status of their application.
- How will you get the staff that knows all requirements and can help navigate the various ministries? I do not think this approach will be successful; instead, you should have key contacts for each permit required, and those individuals can assist proponents through the requirements of the specific permit they need to obtain. This needs to be a direct line to an individual, not a general inquiries email to nowhere.

### BC Non-Profit Housing Association

- FrontCounter BC staff are good. There are specific questions they do not have the responses for. For example, we had a specific request of BC Housing for 60-year lease and as we went through the process, we did not hear that was not even available to the project until 42 months later when we received a 30-year lease.
- Need staff to go through the process and its steps up front (i.e., why we are doing the process, how to do the process.)
- When starting the process, we were told it would take between four to eight months, but it took over 40 months. Throughout that long time, proponents must keep refileing their management plan as things are changing along the way which uses time and resources of non-profits and volunteers.
- Need some accuracy to the timeline expectations.
- It would be extremely helpful for a target timeline that people can work towards. There needs to be a defined period within which a decision is given.
- Building permit people had a target of approvals of between two to three weeks. It would be helpful if after asking all the questions, the Province has a defined period in which the approvals would be granted. We need committed timelines. (e.g., after being told all questions were satisfied on a project, it took nine months to get the water license issued).
- There should be a difference in the process and timelines between affordable housing and commercial or private applications. We need to find a way to fast track affordable housing.
- FrontCounter BC process was wonderful to deal with. Addressing projects on Crown land can be a problem however as ministries work in silos and people do not know what the next steps are because it is a different ministry's next step. Also, there are no clear processes for getting

approvals or correct pathways to different types of projects. Example of a Cabinet decision (couple of months) versus an Assistant Deputy Minister decision (couple of weeks). You can lose entire construction cycles being delayed on decisions – for some projects, the window of construction is short.

- Non-profits use development consultants to pull together applications and it does take specific skills to pull together the applications.
- Non-profits start raising funds early and incur a lot of costs before even a bush is removed from a piece of land.
- The application process is so complex non-profits must hire consultants to navigate the process. We are forced to bring in consultants at quite a cost.
- As a non-profit, we have been lucky to have a retired lawyer on the Board and he was extremely helpful and invested considerable hours over the years to support. The process needs to be streamlined, more transparent. Now the retired lawyer has left the board, we have a huge gap.
- Non-profits are undertaking countless hours to make affordable housing in their communities. It is sad when it takes years to build affordable housing in your community and its hours of work, personal funding, costs, etc. Also, the timelines can be so long that opportunities can disappear (e.g., a landowner no longer willing to sell their land to the non-profit due to the timeline).

### Aboriginal Housing Development Association

- Accessibility housing units have been a challenge in most communities. However, BC Housing needs to ensure they are not over flooding the market with these units because they are more expensive and take up more floor space in buildings.
- It is helpful to have an outside consultant who knows what they are doing to help the non-profits.
- People are learning from their previous applications and fixing mistakes. People need to have a sound understanding of capital and operating budgets. We use outside contractors who have experience for our projects.
- Non-profit organizations should not be asked to have their funding prior to submitting applications. Need certainty to raise funds.
- Non-profits often need seed funding from the Aboriginal Housing Management Association. For example, most projects require upfront work such as geotechnical.
- Often applications get moved through as new builds because the lands have been looked at before.
- The demand is so high now, communities are re- exploring ideas previously passed over. Information developed for previous proposals can be reused.
- One of the stipulations with proposals that prevent projects going forward is the requirement you have to own the land. For non-profits, they may still have rezoning issues to address, and it takes a strong partnership with the municipality to move it forward. Often too much red tape and there are no “breaks” for non-profits. The costs of all the approvals and the effort level of staff to advance projects can be consuming.
- Some projects are partnerships between local First Nations and non-profits (e.g., one agency is doing maintenance, another doing food). The relationship of the project with the municipality must be strong and the project with the ministries. We need to ask questions to understand how to best move forward with different applications.



- Developing relationships within the municipality and province is important. Years before you build anything, you need relationships with the mayor, MLA, and councilors to get help in making the path easier. Municipalities, the Province, and other levels of government need to make some of the burdens on non-profits easier such as tax considerations, etc.
- It would be good to have a single window application process to understand who you need to work with and if you need help from the province to work with the municipality. Sometimes, non-profits might need help from the province to deal with getting municipal support for a project.
- People tend to start projects based on the nature of the ownership of the land. For some projects it would be the municipality, for others they are interested in Crown lands. But in a country setting, it is not always clear where to start.

## APPLICATION INTAKE

Application Intake is the process by which a proponent / home builder submits their application for the necessary permits to engage in a housing development – this includes the work government engages in to confirm the application is complete and of sufficient quality.

Respondents were asked to identify areas where there are challenges and/ or issues relate to the Application Intake phase of the Permitting process. Specifically, respondents were asked:

- What challenges have you experienced in obtaining a completed application status? Conversely, where has it gone well in your experience?
- Do you often experience returned applications seeking further information?
- What practical solutions would make application intake more straightforward, transparent, and overall, a better experience?

### Canadian Home Builders Association BC

- With a Water Sustainability Act application, it can take months to even get the file number. It is a hidden step in the process that is adding to the waiting time. It should be possible to get your file number when you apply.
- One of the bigger uncertainties in lower mainland relates to historical wetlands and streams. This is an enormous “grey area” for interpretation. There needs to be clear guidance on what is and is not acceptable. Historically disturbed sites need clarity. There needs to be best practice. This would reduce timelines by a couple of years.
- Builders get applications coming back asking for more information routinely. It is rare to get one through without at least one round of revisions and this continues to add delays to building.
- An example of what is working well is from Washington state and their environmental reviews. The review is a five-to-six-page questionnaire, and they have clear expectations in the process. It seems to work smoothly. It is a comprehensive environmental review checklist that they fan out to various departments in government for comment.
- Another example is based on an experience in Ontario which requires municipalities to say when applications are complete and set the associated timelines. There is a meeting that must take place with all review bodies, and they go through application and determine what is needed. Mutual understanding is established. The application fee is used to ensure timelines are being met. Constant resubmission restrictions are used to hold applicants accountable and make sure

they are not just taking up staff time with poor submissions. The more times you resubmit, the higher the application fee becomes.

- The national association released a benchmarking study on timelines and costs across Canada. Edmonton and Calgary are at the top of 13 municipalities. There has been a notable change in the culture and ensuring provincial, municipality and developers worked together in Alberta. The Canadian Homebuilders Association BC did a study as well which identified the economic costs of delay.
- There used to be coordinated environmental meetings at a municipal level that would include outside representation and the Province did have a seat at the table. This forum would be helpful for establishing clarity or establishing when an applicant is asking too much from an approval.
- Another delay is that the Province will not look at an application until the federal government renders its decision (e.g., water approvals, RAPR approvals). The two processes cannot run in parallel. The same has happened at the municipal level. A lot of time can be gained by letting processes run concurrently.

### Developers and Builders Associations

- When you submit your application and the application is satisfactory, however another required permit has been identified, we need a culture where provincial staff works with the builder to complete the necessary permit by helping to fill out what information they already have and asking the builder for only the “net new” needed for the additional permit.
- There have been examples at the municipal level where builders who are known to be diligent with completing their applications have forgotten some insignificant detail. Instead of going to the bottom of the pile, the municipal staff have a quick check in with the contractor and let the application stay where it is in line if it is not material to success of ultimate approval process. The wait to be reviewed is too long to go back to the bottom of the pile because of insignificant issues.
- If government were to help more with the completion of the application, it could take the form of the provincial employee starting the process by providing a pathway or guideline for filling out the information needed. If the requirement is unique staff need to make sure the guidance is specific and not generic. Utilizing autofill in the system may be helpful, but likely what is needed more is explanations of what is required and why.
- Need to ensure there is no legacy information in the ether which might be mis-informative. Staff need to ensure all information in the public domain is for the new process.
- Even auto filling information already provided in the application for the next permit is helpful. But we need more interaction with the builders with a positive tone and interactions demonstrating Province is working with the builders.
- There needs to be qualified people with knowledge of processes who can answer builders’ information requests in a timely manner.
- A suggestion would be for the Province to include examples of applications filled out perfectly for demonstrations purposes with builders. It should show the information needed and how it should be presented, etc. There should be a checklist. Then when a builder submits, they can be confident they are submitting a quality document and have not forgotten anything.
- There are instances where after finishing a long permitting process, someone in the Province realizes another permit is needed which triggers a separate new long process that continues the delays starting construction.

- Municipalities sometimes compete with developers when developing their own subdivisions for municipal staff capacity to review and approval private developer proposals.
- There are limited qualified professionals with land development expertise which drives up the costs and time delays for developers.

## BC Housing

- For applications related to contaminated sites it sometimes feels like a black box (i.e., limited to no insights into what is happening internally) and where people are in the queue and if you will have to do more or is your application sufficient. Recent legislative changes have not helped.
- The Province needs to add more detail to the status of an application to help better forecast timing for approvals. Having a dashboard report “In progress” is not really helpful. If there are multiple stages in a review process, it would be nice to know what approval gates have cleared.
- Applications are not rejected, but applications have been returned for further information. They are not field requests for information but often a clarity on a point or need more data. Consultants are relied on for applications.
- Previously it might have seemed an application requiring more information was put to the back of the queue but now it is more the application continues to sit until the information requirement is resolved.
- There is the sense things are paused when further information is requested but not necessarily that you are back to the beginning. As sites become more complicated, we are now doing more joint submissions and it is not as simple as it once was. It is more likely there will be more missing details or follow-up required. How can we be more collaborative? Cultural shift needed from gate keeper to partner.
- There have been experiences when projects are being passed up because of previous issues identified with those lands through previous application process tries. Addressing the requirements expected by the Province is too onerous or expense.
- We are now developing sites which are more complicated or have been built on before.
- For projects that are more complicated, there may be a joint submission from more than one developer. Provincial staff do not always understand why developers are working together.
- BC Housing has developed some of their own internal processes routinely to facilitate provincial approval. These learnings need to be shared with our partners so they can benefit from the value of these steps and understand why they are important.
- For the single window for housing, consider developing multiple platforms. There are various groups navigating permitting and each sector participants have various levels of understanding and access to digital tools. Some participants might still want in-person or on-phone and not all through a technology platform.

## Municipalities

- A single simple streamlined process for affordable housing projects, or a single housing ministry, or a priority system that enables housing projects to get shovel ready more quickly.
- Need standardizing of a project identifier or scale for high priority projects to help with permit review and approvals (i.e., category one – rapid program for high need high demand projects, top of pile to prioritize for quickest review and approval turn around).

- Funding programs that are intended to facilitate rapid housing initiatives have been challenging; inter-dependent permitting processes do not always align, causing delays. There does not seem to be a mechanism to prioritize permit applications related to affordable/ non-market housing, through a designated category or otherwise.
- Faster turnaround time. Just need more staff to process.
- Need quicker resolution.
- Fast-track simpler applications.
- More provincial staff would be the most impactful. Process timelines and access to ministry staff was a common theme amongst departments. For technical permits like Water Sustainability Act and Riparian Areas Protection Regulation approvals, potentially delegating some approvals to technical experts may help with processing times.
- The front-line support must be empowered to provide meaningful responses and not simply function as a 're-router' to other ministries and have inquiries get lost in the shuffle.
- Enhance communications such as promptly responding to proponent submissions/ questions and/ or provide a clear timeline on anticipated response time.
- Improved turnaround time for enquiries (and approvals).
- Encourage ministries to adopt a more flexible, solutions-focused approach.
- Improved turnaround for enquiries from municipal staff.

### BC Non-Profit Housing Association

- We have not had any applications returned or challenged in any way; the process has been so lengthy that circumstances have changed.
- Staff were super helpful and had no problems. Not sure what takes so long to get responses.
- When questions have been asked about an application, we have been told the application has been “bumped.” Not sure if it means it is at the end of the queue.
- There is no priority on affordable housing which is needed. But the slowdowns are across the board. Private developers are delayed as well.
- It has not been so much about getting the information. It is the frustration of the time it takes for the applicant to get the decision or be told what information is needed to get the decision.
- The process is a bit of a blackbox. We do not know what is being held up. Is it the First Nation engagement, staffing issues? We seek clarity on what is happening with the applications once in the system. We need transparency and predictability.
- Predictability is key with targets for turnaround times. Right now, without targets there is no accountability for the delays.
- Staffing, process, and systems are all components which need to be looked at.
- It feels like some ministries do not want to talk to the non-profits directly and prefer to have the buffer with a consultant.
- An example that has worked well with local government is having a project facilitator assigned to the project. They help with the process and intake instead of the applicant having to coordinate with the different areas. They advocate for the project. This helps simplify the process for all parties.
- It is critical that the single intake be coordinated with the municipality. Make sure you have one place for the start and exit to the system.

- Need to be transparent about the process map and timeframe. At the municipal level, what really takes time is missing information or incomplete applications.
- Once completed, then the process needs to be on the clock. Speed is the focus as speed helps reduce risk for proponents.
- Province needs to map out the entire process and then LEAN the process. A lot of information for binary answers (yes or no). There should be automation that can make the decision faster.
- The whole point is to get affordable housing built. We have been working on one project for two years now and thousands of volunteer hours have been spent and when we finish with design work it will be over \$0.4 million spent. This is a lot of time, money, and effort with no guarantee we will receive construction funding. At some point it would be good to have a conversation with the Province and BC Housing about the process.
- Too much time is lost at the regional district level and municipal level. While the Province is looking at their own processes you also need to look at the municipal.
- BC Housing is also part of the equation for non-profits. BC Housing wants all the risks removed from a project before they fund it. The Provincial and municipal approvals are the risks.
- Should look at other Crown corporations such as BC Hydro. It would be best to have everyone involved in housing approvals to be part of this work at the start.
- A specific challenge with BC Hydro is their capacity. Proponents are having to wait to get a designer assigned.
- Proponents are having to start projects without the hydro design which increases their risk.

### Aboriginal Housing Development Association

- Non-profits can now verbally report on the use of monies from funding partners instead of providing written submissions. Could the one-window approach take verbal information to avoid trying to complete the applications? Applications tend to require lots of understanding as to how to fill out the application and using the correct lingo.
- A one window approach could have a list of project managers or consultants that could be given out, especially if applicants are having issues (e.g., want info on determining soil contaminants). The list would be people the Province has seen on applications in the past.
- The application process needs to look at allowing individuals who own property to donate land in a way that is supported by the Province (e.g., tax credit or receipt). The biggest barrier for non-profits is the cost of land. This process is trying to solve problems without looking at other barriers in the housing industry.
- The work being undertaken by the Province on permitting is about process and it is the vehicle for the destination. What is most critical is sorting out how we get some build outs done in short order.
- Debt servicing as a criterion for approval is not working for non-profits projects. Affordable housing is about prevention. We need to figure out how we can make the debt servicing work.

## CONSULTATION - REVIEW - DECISION

Consultation, Review and Decision are the remaining high-level process steps conducted by government to collect input and analyze a proponent's/ home builder's project to inform and ultimately render a decision to authorize the project.

Respondents were asked to identify areas where there are challenges and/ or issues relate to the Consultation to Decision phases of the Permitting process. Specifically, respondents were asked:

- What has been your experience as you work with government through this process?
- What impedes a positive experience today?
- What practical solutions would make the consultation-decision process steps more straightforward, transparent and, overall, a better experience?

### Canadian Home Builders Association BC

- First Nations are swamped with referrals and often there is only one person to address all the referrals.
- There are too many referrals going to many First Nations who do not have the resources to do them.
- Some of cogs slowing down the timelines are not even within the provincial process. General municipalities give 30 days to Province to respond. Most times, the province seeks an extension request. There are no consequences of ministry sticking to its 30-day requirements or asking for extensions the municipalities will not deny.
- The 30-day target has been used for a while but where did it come from? If it used to work, why is it not working now? The First Nations need more resources to hit the target.
- Previously provincial applications were run concurrently with zoning from municipality. You could anticipate getting provincial and municipal approvals at about the same time. About five to six years ago, a process of 120 days was average. Then that changed to a year or beyond just to finish the municipal part of the process. Not sure if this is based on a lack of clarity from municipality or where that came from.
- There are a backlog of applications approvals and people are overwhelmed by sheer numbers.
- Things are not running concurrently now either. For example, the Province does not move an application forward without a specific piece of paper from the municipality. You hit a wall with a longer process that has become problematic.
- When starting an approval, developers are not encouraged to consult/ engage with First Nations until it is triggered by the WSA. The engagement with First Nations is directed by MIRR. It is uncertainty as to when the First Nation will see the application. It is also not the full application package that is referred to the First Nation, but more an executive summary. Usually, it is when a developer has a site walk with the First Nation that the critical conversations start.
- If there were a means to reach out to First Nations early in a project's initiation, it could build success quickly. Developers need to get used to opening that dialogue with First Nations without over taxing staff. First Nations will need support to hire more staff to keep up with their larger workload if they are part of the site development conversation.

### Developers and Builders Association

- For Institutional, Commercial, Industrial (ICI) contractors, there is terror of how long the consultation process can take. These contractors must worry about Not in My Backyard (NIMBY) types or municipalities' views and often in public settings. It is never clear how consultations will go.

- How long it takes to reach a decision is not as important as there being clear communications on the timeline so builders can plan accordingly. Transparency is important and the Province should work towards best practice in reviewing and deciding on applications.
- There needs to be a defined timeline. Decisions of builders could be better informed if there was clarity on timelines. If a project was going to take two years to be approved, then the builder might make different decisions on what projects to proceed with.
- The process needs to be fair, open, and transparent.
- Province needs to use key performance indicators (KPIs) for staff in achieving decisions quickly. Applications need to be tracked and it should be public information on the KPIs. For example, how long does it take to get an archeological permit? There needs to be an accountability component to the process.
- It is a provincial initiative to increase the amount of housing. However, the official community plan, zoning and rezoning is part of the approval process, and these are determined at the municipal level. There needs to be a re-thinking of official community plans, zoning and rezoning in the approval process.
- First Nations are not always responding to requests for consultation. They can be overwhelmed with the number of referrals.
- There are instances where First Nations seek additional archaeology work or challenge particular archaeologists as having a conflict of interest. It adds delays to completing studies and costs time and money.

## BC Housing

- To date, BC Housing has anticipated the decision's requirements, and there has not been a time when getting a decision was unsurmountable.
- Working with the Province when asked for more information and working through the process, it is working that applications are approved.

## Municipalities

### Engagement with municipalities and First Nations

- First Nation consultation for Crown tenures is also taking a very long time and impacting projects.
- First Nations are doing their own housing project on their reserve lands. Their staff resources and funding are also stretched for sewer, water infrastructure. Ideally, we would combine efforts into just 1 project instead of 2 projects but challenging to partner.
- The Province has a duty to consult, but the timelines for getting feedback should be set to give plenty of time, but beyond that time (including after reminders) the process needs to move ahead.
- Municipalities can stand to gain to hear from the Province on what the Declaration of the Rights of Indigenous Peoples Act means for our jurisdiction and practice as it relates to the Local Government Act and Community Charter.
- Very challenging for proponents to receive any sort of response from First Nations, despite multiple attempts. Municipality generally very responsive.
- Very successful. Staff take the time to discuss projects at the conception phase.



- For municipal staff there are clear requirements for identified archaeology sites. However, municipalities are beginning to set up different requirements depending on the municipality and their relationship with the First Nation. This is leading to greater uncertainty for developers.
- Approaching municipalities or local governments is often easier for proponents as they are more accessible and have dedicated staff. First Nations may not be as accessible or as readily have the resources to engage.
- Proponents have indicated that engaging with municipalities is easy if they have sufficient staffing levels.
- Proponents have indicated that engaging with First Nations is more complex and often they do not know where to start.
- Proponents have expressed concerns over a lack of clarity and direction around provincial processes, timelines, and associated costs, particularly when it involves First Nations.
- First Nations do not have the capacity to engage adequately, which also provides delays to the review process.
- Currently we find we are not fully capturing or addressing comments made by First Nations communities, knowing the full rationale behind a comment, instead of a summary, would be useful in our work.
- The permitting process is extensive and expensive and opportunities for simplifying regulatory processes need to be further developed. Nations are very resource constrained by the number of referrals they receive.
- Municipal governments are limited in information they can provide to proponents on provincial process related to heritage conservation.
- Within our local authority permits are easily explained and discussed. Good communication and proper connections with the Province can assist us in directing proponents through the proper channels within the Province and assist in providing an overall more efficient development process.

### Overall experience after submitting applications

- Overwhelming- requirements are often confusing and not clear.
- Frustration with the extremely long timelines to obtain approvals and an inability to get a key contact (actual staff representative), and if you do, it is not a timely reply. Also not dealing with one person. Many ministries have a general mailbox which is handled by multiple staff members. Staff changes at the Province have complicated the process.
- There are several projects waiting on the sale of British Columbia Transportation Financing Authority lands to allow for new road connections that have been held up for several years. It would be helpful to have some kind of timeline for these consultations.
- BC Housing needs more staff and more funding to support more projects. There is a shortage of pre-development funding from BC Housing to help non-profits get started.
- Local government recommendations are provided to the Province in a timely manner. The big delay is getting the approval (or not) from the Province.
- Provincial turnaround times are excessive.
- Generally good, although sometimes proponents do not like the decision made. Impeding a positive experience is the political aspect of an application that requires a Council decision (e.g.,

one application approved vs another, similar application not approved, and no reasons provided by Council other than "neighbours don't like it").

- Incorrect or inadequate information on forms.
- Confusion on what the requirements are and who is reviewing and anticipated time of reply.
- Delays in processing. Lack of clear communications on subsequent approval processes.
- Lack of communication and extensive timelines and the inability to talk to a ministry representative with knowledge and authority to make decisions/ provide direction on an application.
- Not knowing timelines is affecting positive experience. The uncertainty surrounding when a project will be reviewed and if there will be outstanding conditions of approval created uncertainty for applications. Having clear messaging regarding processing times and expectations/ conditions of approval/ information or documentation required would be useful.
- Often a lack of communication, and very long review times. The single most important item impeding the positive experience with the Riparian Areas Protection Regulation process has been the length of the review time. Next would be the requirement to complete building-level reports after subdivision-level reports have already been approved – the rationale for this is unclear, and the added cost and review time is problematic.

### BC Non-Profit Housing Association

- The decisions come with more conditions that further delay construction (e.g., a subdivision requirement – takes another 11 months). A roadmap would really be helpful.
- Consultation is happening at the local government level as well. Is there a way to streamline to make the entire process more efficient and avoid consultation with multiple levels of government gathering the same information?
- Sometimes it is difficult to know who has jurisdiction for the approval. It would be nice to have one approval. Avoid having municipalities wanting their “stamp” on a decision too.

### Aboriginal Housing Development Organization

- Development investors want clarity on timelines and commitment to work within the timelines.
- The lack of communication, and not understanding if there is an issue with the application has been heard from stakeholders. The Province needs better communication on the process and timelines. As well there is too much jargon in the applications and for non-profits, we need to be clearer in our language.

## PRIORITIES

Respondents were asked:

- What priorities should the Province consider when acting on improving authorizations associated with housing?
- What will be the most impactful to help proponents / home builders complete their application?
- What will most improve the overall experience through the application process?

### Canadian Home Builders Association BC

- Some issues are being hammered to death and delays permits. If the goal is to increase the supply of affordable housing, then all levels of government need to review applications with this lens and triage them accordingly.
- The top priority is triage.
- Other priorities are clarity, consistency, communication, and availability. Assigning a concierge is a good idea, but staff must be able to communicate in a timely way and be able to strain out things that are not applicable.
- We need to have staff that can sign off and move applications along. There needs to be coverage of staff to keep the work flowing (e.g., vacation, leaves).
- The priority should be on clearly defining the application review milestones and service commitments (e.g., timelines).
- Setting clear expectations and clearly communicating those expectations is a priority. The more the developers understand what is needed the better they can provide it.
- The Province needs to reduce peer reviewing qualified professionals' work.

### Developers and Builders Association

- In the past, staffing issues have impacted the timeliness of approvals so was pleased to see Premier's announcement includes increased staffing.
- Vacation coverage is key. A two-week delay when a staff member is away is a significant delay for a developer. There needs to be a knowledge transfer or some sort of mechanism to keep the process rolling when staff are away.
- Province needs to start trusting the industry and its professionals and not second guessing everything especially if it is stamped by an engineer.
- Developers and builders that repeatedly submit applications with a good standing should not have to go through the same rigour as a first-time applicant. Developers and builders experienced in delivering good quality applications should move through the approval process more quickly and smoothly.
- The Province needs to work with builders and contractors and give recognition to contractors who have been fair, open, and transparent with the process. The approval system needs to be built on trust. The process should facilitate rather than punish. Eventually the process will weed out those who do not belong in industry.
- The Province needs to fast track multi-unit residential. Single family homes will not solve the Province's housing shortage.
- There is no in-person service, nowhere to go for help. There used to be staff in local offices that developers could meet with in person to discuss issues and this helped with moving applications.
- The Province should investigate providing staff assignments for municipalities willing to accept help to move municipal permits along or publish information and be the municipal client service arm that is missing from municipalities.

### BC Housing

- More staffing resources are required to review the applications and approve permits.

- When considering who to hire for consultation teams to support a project's application, perhaps the ministries can create a roster of qualified experts that proponents can rely on for helping to navigate through the process who have a track record of being successful.
- It is important that all sectors and those working in the sectors are educated on the housing permitting process and requirements.
- Review time depends on content, so it can be difficult to provide certainty in timing; however, delays are of concern. If there is a delay in permitting, then the project is affected, and it can be very costly.
- If the industry had a general projection on the timeline and an update at each step, it would be helpful. There needs to be clarity and transparency upfront on the timeline, tracking and communicating to applicants. Then applicants will not have to follow up with staff.
- If you add more resources, you might at some point be able to get to a better level of certainty.

### Municipalities

- Prioritizing highest needs by categorizing permit applications (i.e., rapid housing initiative projects to the front of the line) when being funded by provincial and/ or federal funding to accelerate housing projects.
- Could think about prioritizing affordable housing, but that does risk unintended consequences if it means a very long wait time for other developments, which could be very important for community wellbeing also.
- More flexibility is needed on adding infill housing. Health authorities also need more flexibility on septic for infill housing.
- Increased staffing/ resourcing so questions from proponents and local governments can be answered more quickly.
- Sufficient staffing, more accountability, and a path to escalate discussions when staff are not getting responses. It is common for emails to go unanswered for weeks on end, and there needs to be a way to contact someone in these situations.
- Clearly identify the agencies that need to be involved and how to contact them. Clear parameters on the reports required from developers: traffic impact study; riparian area assessment; access permit; archeology assessment; geotechnical assessments; water studies; etc. should try to become as uniform as possible. Have resources municipalities can point to as basic requirements. Clear understanding of the professional requirements and reliance on them.
- Acquiring or training the right personnel and having the proper staffing levels to deal with the volume of work. Empowering those in charge of reviewing documents and applications with more authorities to accept and approve them.
- Look at some relaxations for environmental requirements.
- Maintain importance of ecosystem and riparian health.
- Health and safety should always be the priority, followed by environmental considerations. However, there still needs to be an examination and assessment of the effectiveness of legislation and approvals currently required.
- The amount of regulation and permits required for activities on private property vs industry is backward. Industry has the most significant impact on environmental degradation; those activities should be going through a much more rigorous review and permitting process.

- Ensure processes can occur concurrently. Development approvals often must wait until other processes have reached a certain stage or been completed, which adds extra time to the whole process.
- Ease of use, clarity, reduced timeframe for processing. Need simple regulations to achieve overall objectives.
- Priority focus should be on providing clarity and timeliness.
- Having consistent timelines across the different permits and creating service delivery targets would be useful. Additionally, having an expedited process stream (with a fee) may be worth exploring.
- There needs to be standard (or least estimated) response timelines.
- Reviewing and providing accurate and acceptable application review and approval timelines that work with financing, funding, and development timelines.
- Review owner / builder regulations.
- Priority should be on water, sewage, roads and then drainage.
- Priority should be on rezoning, building permits, rural water and sewage infrastructure funding and approvals. MOTI road building and storm water system approvals for rural road building into affordable home properties.
- Do not create another permitting stream. There are enough permitting processes already and simply adding another "streamlined" stream for housing is just adding to the overall complexity of the permitting jungle.
- Identify referrals that could be eliminated or adjusted to reduce processing time on provincial referral requirements that are not complex and/ or redundant with local government requirements that address similar objectives (e.g., for rezoning applications within 800 metres of a controlled access highway could be eliminated or adjusted).
- Areas with geotechnical concerns would benefit from more provincial support/ involvement, especially in more rural areas.
- In the case of the Riparian Areas Protection Regulation reviews, the priority would be to adequately resource review staff so that review times are more in line with what they used to be before the change from Riparian Areas Regulation to Riparian Areas Protection Regulation. Also, to finalize and implement a streamlined review process.

### BC Non-Profit Housing Association

- The process needs to have existing applications grandfathered when there are changes to building codes, regulatory things. Proponents cannot keep changing applications or having permitting delays because of these types of changes.

### Aboriginal Housing Development Association

- The concierge approach needs to address the individual issues that arise. Most projects are unique and therefore the Province needs a boutique solution approach. Suggest the Province run the new approach against some projects, learn from the experience and test the system from concept to reality.
- The new approach needs to address equity, support, and simplicity.
- Many housing providers do not have the capacity to cope with onerous processes.

- The Province needs to try to streamline the process. We need housing built for the people who need it. The non-profit sector is the key to getting it done. Non-profits need support and to have a streamlined process to get it done. Non-profits can fill the void if supported.
- There is a load of expertise in the non-profit sector for addressing the housing crisis.
- Tax receipts for land donations are very important.
- The one window might help but more effective is a sit down with appropriate people so they can feel they have been heard and can be given direction.
- A priority for the province is to understand how much money the three levels of government are contributing to keep people homeless. We have a housing shortage now, let's address it and not wait another two to three years (e.g., Case study: Economics of Homelessness, Native Counsel Nova Scotia).
- The return on investment for investing in "for Indigenous, by Indigenous" solutions is clear.
- The on-reservation affordable housing need is more than 10,000 units. Just to maintain the current portfolio, we need to create 3,000 units over the next 10 years, which is \$100 million to \$120 million of development a year. We need a strategic and tactical plan to get housing built to make these timelines. We need all non-profits contributing to meet the goal. Start with the goal and work backwards to develop a plan which everyone sees themselves in.
- Aboriginal Housing Management Association's strategy [www.ahma-bc.org](http://www.ahma-bc.org)

## 7. Appendix B - Communique to Participants

Recipients:	Housing Permitting Engagement Stakeholders
From:	Jennifer Anthony, Executive Lead, Permitting, WLRS
Subject Line:	Provincial Housing Authorizations Engagement

Good morning/ afternoon,

Creating housing for middle-class British Columbians is one of the highest priorities for Premier Eby's new government. In fact, Premier Eby has set aggressive targets for tangible impacts on housing in his first 100 days in office. Making progress on housing remains of critical importance to the Province – we understand housing is essential to the long-term viability and growth of British Columbia across all sectors.

As part of our provincial housing strategy, the Province is looking to engage with housing stakeholders to understand experiences in obtaining permits for housing development and more importantly to hear suggestions for improving how the Province issues these permits. More specifically, we are seeking to engage with you due to your unique perspectives as a leader and/ or organization in the housing sector. We are seeking to explore practical and viable opportunities and to help shape the Province's 'one-window' approach as well as table considerations on how to prioritize the volume of existing applications.

As stewards and experts in the housing sector, your feedback will provide valuable insight into how the Province can take near term steps to meet middle class housing needs. We would like your input on the following:

- What challenges do housing builders and developers experience in obtaining authorizations in the housing process?
- What viable and pragmatic solutions would make obtaining authorizations associated with housing development more straightforward and transparent?
- What priorities should the Province consider when acting on improving authorizations associated with housing?

The workshops are expected to be two hours in length and will be facilitated by Elevate Consulting Inc, an independent consulting firm based in Victoria, B.C. A representative from Elevate will reach out to schedule a time with you. Please forward the invitation to others in your organization who you may wish to participate.

Thank you for taking the time to participate in this important initiative. Your input is critically valuable and essential. Should you have any questions, please do not hesitate to get in touch with me directly [Jennifer.anthony@gov.bc.ca](mailto:Jennifer.anthony@gov.bc.ca)

Kind Regards,

Jennifer Anthony  
Executive Lead, Permitting/ Authorizations and Statutory Decision-Making Solutions (PASS)  
Ministry of Water, Land and Resource Stewardship



## 8. Appendix C - Infographic

### ACCELERATING PROVINCIAL HOUSING AUTHORIZATIONS

Housing supply and affordability is one of the leading issues across B.C. Some of the barriers include the time, cost and confusion associated with the provincial authorization process.



Average time to get provincial building authorizations: **2 years**  
 Housing-related authorizations pending review: **1,500**  
 Ministries overseeing various steps in the approval process: **4**

It can be a time intensive process that can be difficult to navigate and lacks transparency.

#### WHAT DO NATURAL RESOURCE MINISTRIES (NRMs) HAVE TO DO WITH HOUSING?

The authorization process may involve obtaining multiple applications from various NRMs, each with its own set of regulations and standards.



**Want to build near a wetland?**  
 You may need a Riparian Area Assessment from the Ministry of Water, Land and Resource Stewardship.



**Want to connect to an existing roadway?**  
 You'll need an access permit from the Ministry of Transportation before you even get started.



**Want to dig down?**  
 You may need a Site Alteration permit from the Archeology branch of the Ministry of Forests.



**Want to build on a previously developed piece of land?**  
 You may need an authorization from the Ministry of Environment.

NATURAL RESOURCE MINISTRIES:



Forests



Transportation and Infrastructure



Water, Land and Resource Stewardship



Environment and Climate Change Strategy



Permits and authorizations play a necessary role in ensuring environmental and safety standards and reconciliation principles are met.

#### WHAT IS THE CURRENT PROCESS & WHY DOES IT TAKE SO LONG?



These processes are important, but there is an opportunity to allow an easier path to build much-needed housing for British Columbians.

### SO WHAT ARE WE DOING TO ADDRESS THE ISSUE?

#### HOUSING ACTION TASK FORCE

The Ministry of Water, Land and Resource Stewardship (WLRS) is leading the Housing Action Task Force and cross-ministry work to improve timing and transparency of authorization processes.



**42** new full time NRM positions dedicated to fast tracking housing authorizations added this year.



Immediate focus will be on Indigenous-led projects, BC Housing applications and multiple-unit applications.

The Housing Action Task Force has been established and the lessons learned will be applied more broadly to other Natural Resource activities.

The goal is to simplify the application and review process, so that there is transparency and clarity in seeking a provincial authorizations.

Through the efforts of the Housing Action Task Force a Single Window and Single Application will be developed and implemented.



We will be engaging with building and housing associations, Indigenous groups, and the natural resource sector to identify opportunities for improvement.



## 9. Appendix D - Participating organizations

Aboriginal Housing Management Association

Affordable Housing Societies

BC Construction Association

British Columbia Real Estate Association

BC Non-Profit Housing Association

Canadian Home Builders Association BC

Canadian Mental Health Association

Catalyst Community Development

Connexus Industries

Conayt Friendship Society

Dakelh & Quesnel Community Housing Society

Denman Island Community Land Trust

Denman Affordable Housing

Gorge View Society

Greater Victoria Housing Association

Greater Victoria Housing Society

Helping Spirit Lodge Society

Ki-Low-Na Friendship Society

Kekinow Native Housing Society

Lower Nicola Indian Band

M'akola Development Services

New Vista Healthcare and Housing

North Okanagan Friendship Centre Society

Prince George Native Friendship Centre

Vancouver Native Housing Society

Vernon Native Housing Society

### Union of BC Municipalities:

- Regional District of Bulkley-Nechako
- Cowichan Bay Waterworks District
- City of Langford
- Cortes Community Housing Society
- Qathet Regional District
- Lantzville
- District of Sechelt
- Cariboo Regional District
- City of Pitt Meadows
- District of Highlands
- City of Quesnel
- Regional District of East Kootenay
- Township of Spallumcheen
- District of Sooke
- City of Kamloops
- Village of Cumberland
- Regional District of East Kootenay
- City of Colwood
- City of Port Moody
- Regional District North Okanagan
- City of Delta
- City of Coquitlam
- City of Vancouver Department of Non-Market Housing Development Department (Arts, Culture and Community Services) and Environmental Projects & Programs Department (Real Estate and Facilities Management)