

March 25, 2019

Mayor Kennedy Stewart and Council

City of Vancouver
453 West 12th Avenue
Vancouver, BC
V5Y 1V4

Dear Mayor and Council:

Re: Unifying the Planning and Development Services Functions into One Department

As a diverse coalition of residential and commercial industry stakeholders, we are writing to respectfully request that Council take a bold step towards addressing lengthy processing times, by unifying the planning and development services functions at the City under one department.

First and foremost, we would like to take this opportunity to wish Kaye Krishna, the City's General Manager of Development, Buildings and Licensing, well in her future endeavour with the provincial government. Ms. Krishna took many steps to improve processing times for projects in Vancouver, especially for affordable housing. We are encouraged knowing that Ms. Krishna will bring her tremendous expertise and experience to her new role with the provincial government.

We understand that Council will soon be seeking a replacement for General Manager of Development, Buildings, and Licensing. We believe that there is a natural opportunity now to reconsider the organization of the planning and development services functions at the City – especially given Council's strong interest in improving processing times through initiatives such as the Regulation Redesign Project and the ASAP Pilot.

In the past, and much like the current practice of many other municipalities, the planning and development services functions fell under the same department. We respectfully ask Council to consider aligning them once again to improve the coordination between the various steps of the development review process to ensure there is better implementation of City's policies. Coordinating the rezoning process and development permit process will undoubtedly make the delivery of new housing more efficient.

Three years ago, the previous Council decided to take a different organizational approach and hired two General Managers – one for the Planning, Urban Design, and Sustainability Department and the other for the Development, Buildings, and Licensing Department. Despite best efforts and the good working relationship between the two department heads, it's our

view that this approach did not work as effectively as when the departments were combined.

Our members have noticed increasing miscommunication between the rezoning and development review processes, which has led to significant delays in project timelines and, ultimately, in the delivery of new housing, including rental housing. Many of our members found that design approaches discussed and negotiated at the rezoning stage were not supported at later stages of the development review process. By having a single department manage all of the process from the pre-application state to the release of Occupancy Permits, we believe there will be better coordination and accountability between the numerous reviews projects must undergo. One project facilitator could shepherd a development through the City's entire review process. As such, they would have the needed background knowledge of the ongoing issues and discussions related to the project. They would know and understand why key decisions were made during the course of the review process.

Over the past few years, Vancouver Council has introduced a myriad of new housing policies. The implementation of them has proven difficult. In part, this is due to the Planning, Urban Design, and Sustainability Department writing policies that are implemented at the project level by Development, Buildings, and Licensing Department. If the two departments united, there would be better linkages between policy staff and development review staff. For example, it would allow for more clarity and faster decision making regarding the priority of the City's numerous policies when they conflict; for example the priority for affordable housing projects.

Merging the departments would also allow the City to use concurrent processing to expedite project reviews. Several local governments concurrently review Rezoning and Development Permit applications. This is a Best Practice cited by the Greater Vancouver Board of Trade in their [Unlocking Supply: Housing Affordability and the Missing Middle](#) Report and in a Simon Fraser University Report, [Getting to Groundbreaking: Residential Building Approval Processes in Metro Vancouver](#).

The City of Vancouver successfully utilized this approach as an incentive (expedited approvals) for the Short-Term Incentives for Rental program. In many cases, our members are already providing the City with detailed Development Permit level drawings and information at the Rezoning stage. We would like to the City to move towards concurrent processing, particularly for rental housing projects, and this would best be coordinated if one department managed Rezoning and Development Permits. If the consolidation is not feasible between the two departments, the planning function of development department – i.e. development permits and other functions should be reconsolidated back to planning, although we would recommend full unification of both departments.

The senior staff in both departments put their best efforts into making this new organizational structure work and this is not a criticism of their efforts. Our members are simply navigating two processes with two separate departments and we suggest, for the reasons noted, that Council strongly consider re-unifying the Planning, Urban Design, and Sustainability Department with the Development, Buildings, and Licensing Department. This is a proven approach that has worked for the City, other municipalities and our members in the past, that we hope can be adopted again as a significant step towards addressing lengthy processing times and red tape.

We would be pleased to meet with you if you have any questions, or wish to discuss further.

Yours sincerely,



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BC Non-Profit Housing Association



Damian Stathonikos, President
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Thom Armstrong, Executive Director
Co-operative Housing Federation of BC



Mark Sakai, Director of Government
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HAVAN



David Hutniak, CEO
LandlordBC



Pedro Tavares, Development
Government Relations, Co-Chair
NAIOP – Vancouver Chapter



Anne McMullin, President & CEO
UDI - Pacific Region

ABOUT US:

BC Non-Profit Housing Association



BC Non-Profit Housing Association (BCNPHA) is the provincial umbrella organization for the non-profit housing sector representing more than 500 societies. Together non-profit housing societies manage more than 65,000 units of long-term, affordable housing in over 2500 buildings across the province.

BOMA BC



Founded in 1911, the Building Owners and Managers Association of British Columbia is the largest commercial real estate industry association in the province. Our association has over 300 corporate members that own or manage the majority of commercial space throughout BC, as well as the businesses that support them. BOMA BC is an affiliated member with BOMA Canada and BOMA International.

Co-operative Housing Federation of British Columbia



The Co-operative Housing Federation of BC (CHF BC) represents more than 260 housing co-ops with almost 15,000 co-op homes in British Columbia. CHF BC provides education, group buying and advocacy services to its members. It also delivers professional management services through a non-profit subsidiary and social purpose real estate development services through its Community Land Trust Foundation.

HAVAN



Homebuilders Association Vancouver (HAVAN) is the new, rebranded name of the Greater Vancouver Home Builders' Association (GVHBA), representing some 1,150-member companies involved in all facets of the residential construction industry in Metro Vancouver. Our members include builders, developers, renovators, suppliers, trades and industry support companies.

LandlordBC
LANDLORDBC

LandlordBC is a non-profit professional industry association which represents private market residential landlords of any size, including owners and managers of purpose-built rental housing, secondary suites and investment properties like condos. Increasingly, LandlordBC's constituency includes REITS, pension funds and rental housing developers who self-manage the rental properties they build. LandlordBC is focused on delivering safe, secure, sustainable rental housing for British Columbians, and through advocacy and outreach fosters public understanding of the industry. The private market rental sector provides homes for over 30 percent of BC households, and delivers a significant majority of rental housing affordable to moderate incomes.

NAIOP – Vancouver Chapter



NAIOP Vancouver represents commercial real estate developers, owners and investors of office, industrial, retail and mixed-use properties. It provides strong advocacy, education and business opportunities and connects its members through a powerful North American network.

UDI – Pacific Region



UDI Pacific Region is a non-profit and non-partisan association of the development industry and its related professions in British Columbia. UDI represents thousands of individuals involved in all facets of land development and planning, including: builders, non-profit housing organizations, property managers, landlords, financial lenders, lawyers, engineers, planners, architects, appraisers, real estate professionals, local governments and government agencies.