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May 11, 2020

Mayor Kennedy Stewart and Council
City of Vancouver
453 West 12th Avenue
Vancouver, BC V5Y 1V4

Dear Mayor and Council:

Re: Motions B4 and B6 on the May 12, 2020 Council Meeting Agenda

On the May 12 Council meeting agenda, there are two motions for consideration that we ask Council to support - [Motion B4](#): *Rescinding Motion to Include C-2 Zones in Rental Housing Stock Official Development Plan (ODP)* and [Motion B6](#): *Improving the Effectiveness and Efficiency of Development Application Processes*.

In terms of the latter motion, improving the development review process has always been a critical issue for builders, but it is even more important in the context of the COVID-19 pandemic and the economic downturn we are all facing. The focus of the motion is on the Letter of Enquiry (LOE) stage, which has become particularly lengthy, costly and problematic.

This well-intentioned step in the development application process was introduced years ago as a placeholder to help builders determine a project's viability before committing significant resources and costs on proceeding with formal development applications. While the process has always been voluntary, builders knew best practice was to consult civic staff before submitting any rezoning application.

Many of our members were pleased to complete what was previously a short and inexpensive review. Our members provided three-page letters to the City and typically received feedback from staff within weeks.

Now, there is a three page [checklist](#) of documents and drawings that need to be provided, so the staff reviews are taking months – not weeks. Builders are required to spend significant funds on costly professional services like architects and engineers with detailed drawings and formal plans before they learn about the project's viability. Then, they're required to do this all over again when they submit a development application for rezoning. The result is a significant duplication of work and added costs and time on the processing of projects. This is further compounded because the City doesn't manage the timelines for the Letter of Enquiry process nor include them in the reporting of development application times in general.

Another area of concern is the lack grandfathering for applications at the LOE stage. If a policy or fee changes at the staff or Council level, those initial Letter of Enquiry submissions are not grandfathered from the changes. A builder may have to start all

over again with a re-design, adding significant costs and months, if not years, of delay to completion of a much-needed housing project.

In addition, because the materials needed to make an LOE submission have increased substantially, the time it takes to prepare the drawings and documents can take months. During this extended period of time, builders have to pay the Empty Homes Tax and the costs are passed onto buyers and renters alike.

We commend the intent of *Motion B6*; and if it is adopted as is, it would be expected that experienced builders will choose to go directly to rezoning. However, if builders choose to submit a pre-application on a voluntary basis, we respectfully suggest the motion also specify that staff look at ways of simplifying the Letter of Enquiry process and reducing the information that builders need to provide the City at this early stage to avoid duplication within the development review process. Ideally, the City could establish timeframe targets for response in weeks for LOEs, so rezoning applications can be made more quickly. At the very least, this should not be a problem for applications in areas of the City where there are detailed plans like downtown, the West End and the Cambie Corridor.

In addition to the LOE motion before Council on May 12, *Motion B4* is also important. For reasons that we have discussed with and written Council about, we also support *Motion B4*. I am attaching information we have provided Council in the past regarding the negative impacts of applying the Rental Housing Stock ODP to the C-2 Zones on projects and on the delivery of new housing – including rental housing.

We thank Council for reviewing both the issues with the LOE process and the application of the Rental Housing Stock ODP to the C-2 Zones. UDI looks forward to working with the City of Vancouver as we begin to work to recover economically from the COVID-19 pandemic.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anne McMullin', with a stylized flourish at the end.

Anne McMullin
President & CEO