



Mayor Megan Knight
OFFICE OF THE MAYOR
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Transmitted by Email: HOUS.minister@gov.bc.ca

Honourable Ravi Kahlon
Minister of Housing
Room 248
Parliament Buildings
Victoria, BC V8V 1X4

Dear Minister Kahlon:

Re: Proposed Housing Targets (draft) for the City of White Rock

This letter has been prepared on behalf of Council, in response to the draft Housing Targets proposed for the City of White Rock. We are pleased to see that the draft targets are not inconsistent with our own 2021 Housing Needs Report and appreciate the opportunity to comment on the proposed targets. Through this letter, we would like to provide further context regarding White Rock, which was also conveyed by staff during the three staff-to-staff level meetings held over the course of May 2024.

As a Council we appreciate the Province's commitment to the "Homes for People Plan" to make more housing available across British Columbia, and we recognize that all local governments will have a role to play in the implementation of this Plan, with supports from the Province.

Current and Recent Initiatives in Support of Housing:

A) When this Council was elected to office, we developed a robust Strategic Plan, including several priorities intended to address housing concerns within the community. The following strategic priorities directly relate to the construction of new homes in the City:

1. Develop a project plan to build a new community hub

An internal steering committee is in the process of determining the City's needs for a new City Hall as we have exceeded our current capacity. Through this process other associated and complimentary uses are being evaluated, including the incorporation of a new affordable housing development.

2. Assess long-term land use and density in Uptown (town centre), along North Bluff Road, from Oxford Street to Finlay Street, in consultation with Surrey's approved Semiahmoo Plan.

This project has temporarily been put on-hold so that staff capacity could focus on the implementation of Bills 44, 46 & 47 as mandated by the Province.

3. Encourage missing middle housing (e.g. duplexes, triplexes, small townhouses, coach houses) through infill development in established neighbourhoods to provide more housing options for families.

This priority has generally been addressed by Bill 44.

4. Develop an affordable housing strategy to support the creation of appropriate affordable housing options through future development.

This priority is currently under development. Staff are working to assess the tools that will be available following the introduction of the recent housing legislation.

5. Prepare a new Development Cost Charges Bylaw

This project is currently underway. A secondary review will be necessary once the impacts of density from zoning changes as a result of Bill 44 are better understood, and other applicable new legislation.

6. Expand the definition of permitted uses for home based businesses.

This project is temporarily on-hold for implementation of Bill 44, its intent though is to provide more opportunities for small businesses and home owners/tenants to work out of their homes, thus helping to eliminate associated expenses which may impact income available for housing.

7. Add up to four-full time building permit staff over four years: 4 staff

This includes hiring new building official positions and clerical support staff. The City is experiencing recruitment challenges and has not yet been able to fill vacant and new positions. In order to address this gap casual building officials are utilized where possible and Council directed the use of a third party consulting firm to help reduce building permit application backlog.

8. Complete e-apply implementation for application submissions

This project is underway, but is affected by staffing capacity. To date, staff have developed an application portal to help streamline inquiries that staff respond to over the front counter, with the intention to reduce staff time spent responding to general inquiries. Staff are interested to learn of the outcome of the Province's pilot for the Building Permit Hub program, to understand if this will be of value to the City in the future



9. Review the Planning Procedure Bylaw for opportunities to streamline the planning approval process.

This project is underway, and will be completed following the implementation of Bills 44, 46 & 47 as required.

10. Consider strategy and review bylaw rules for short-term rentals.

With the enactment of Bill 35, staff have updated the City's requirements to ensure they align with the provincial requirements. The City was already a leader in this area, requiring business licenses for air bnb operators, only allowing air bnbs within approved secondary suites, and requiring the principal residence to be owner or owner-family occupied.

11. Assess long-term land use and density from 14871 Marine Drive (Elm Street) to 15081 Marine Drive (east end of West Beach) to accommodate four-storey buildings.

This project has not been started. Currently a maximum of three storeys is permitted in this area.

- B) Also, during the most recent election period, Council heard clearly the frustration that local developers had with building permit review wait times. In some cases, the wait time to have a permit pulled for review exceeded 10 months. I am proud to say that Council listened and directed staff to look into and retain the services of a third party consultant to assist with the permit review process, and as a result the current wait time has been reduced to two to four weeks.
- C) In 2018 the City adopted a Tenant Relocation Policy, which supports tenants over and above the standards established under the Residential Tenancy Act, when re-development of existing rental housing is being proposed.
- D) The City prepared and submitted an application to the Federal Housing Accelerator Fund program in an effort to obtain funding support for housing initiatives in the City. Unfortunately, we were unsuccessful in our grant application.
- E) The City is currently in the process of developing an Affordable Housing Strategy, intended to set parameters for the development of policies in support of increasing affordable housing options within the City. Council has approved a framework, and the City's Housing Advisory Committee is currently in the process of building each framework item into a specific strategy.
- F) On June 10th, 2024 Council gave First and Second Reading to a new Zoning Bylaw intended to meet the Provincial requirements for Small Scale Multi Unit housing, thus providing more opportunities for missing middle housing, and meeting one of Council's strategic priorities for this Council term.

We understand the Province is preparing permit-ready standardized designs to support the implementation of SSMUH. We are interested in opportunities to review whether these designs can be applied to White Rock's unique topography.

Conditions Limiting Timing and Approvals of Development

- A) The City is approximately five square kilometers in land base, with steep slopes leading to the waterfront. There is no greenfield land available for development, so development of new units will be based on re-development sites only. Further, the City is built out, with very few opportunities for vacant land development. This leads to longer approval process timelines, as considerations for slope and geotechnical matters must be addressed, tree protection measures undertaken to meet Regional urban tree canopy guidelines, and development permit approvals necessary to develop sensitively within the community.

Based on our land size and our population, the City has a high density of 4240.6 people per square kilometer (source: Statistics Canada 2021). This is significantly higher than other comparable sized municipalities. We would like to understand from the Province what the provincial expectation is for density and neighborhoods in White Rock into the future. Population growth can be calculated, however the evolution of the City is being dictated by legislation, by those without a first hand understanding of the nature of White Rock, the community values, the geographical and topographical characteristics, and the service capacity and demands.

- B) In recent years, White Rock has grappled with significant challenges in staff retention and recruitment, particularly concerning qualified building officials. The strain has been exacerbated by a trifecta of issues: difficult-to-fill vacancies, an overwhelming application backlog, and the pressure to meet developer expectations. This confluence has led to burnout among staff, threatening the City's ability to maintain Provincial standards for qualification levels, crucial given the intricacies of development in the area. While the innovative step of engaging a third-party consulting firm provided a temporary solution, it's evident that this approach is not sustainable in the long term. Until more qualified building officials are trained up, staff capacity matters will continue to influence application review timing.

Provincial changes to the BC Building code, with more mandatory qualification standards, make the recruitment process more challenging. Additional provincial supports are necessary in order to ensure that small communities such as White Rock can continue to meet community and Provincial expectations for building permit review, inspections, and qualifications.

- C) We understand that units are not considered "counted" until they have reached the occupancy stage of construction. We would like to note that the City cannot require a developer to begin or complete construction of a building, nor can we regulate the timing of this work, or the market factors (such as cost and supply of construction materials, availability of construction workers and trades, interest rates etc.) that impact development. Therefore, for a unit to achieve occupancy, and be considered as meeting a target, is entirely outside the scope of a local government.

We appreciate that the reporting program provides the City the opportunity to comment on the status of applications that have reached Third Reading, and Building Permit issuance. Because completion of units under construction is not within the scope of control of the City once a permit has been issued, it is our opinion that permits issued should be the criteria on which target achievement is assessed, rather than the current approach which is based on the issuance of occupancy.



- D) Similarly, as a development progresses through the rezoning stage, there are often important conditions of approvals which must be addressed before a zoning bylaw can be adopted. These will vary project to project depending on site and infrastructure conditions, but often involve infrastructure and servicing matters. Even if a timeline is prescribed within a Development Procedure Bylaw, it is beyond the City's control whether the developer manages to complete required conditions of Third Reading within that timeframe, nor can a local government control external matters, including provincial approvals, which may also impact the timing of the development approval, and which may be limiting factors for developer decisions on project feasibility.
- E) We understand that the unit make-up, while recommended to be considered, is not required to be achieved at this time. The City has policies within our official community plan which encourage the provision of a percentage of units as family -oriented with 2 and 3 bedroom mixes, and we have been working to achieve this through rezoning applications.

However, on the understanding that in the future the Minister may choose to make numbers of particular forms of units mandatory, we would encourage the Province to increase the availability of financial supports for assisted-living and supportive housing developments. It is not within the mandate of a local government to build housing. Particular sectors of the community, such as those individuals experiencing homelessness, have significant needs which the City is unable to provide, particularly given that much of the City's tax base is residential.

The City has been working to address immediate needs for the last 3 years, by opening a Daytime Warming Centre, at the cost of approximately \$350,000 per year. This service provides not only a warm place when area over-night shelters close, but also includes medical supports, basic supplies and food, and other benefits such as connections to services and even family reunification. The City continues to seek support from neighboring municipalities, the private sector, and for grant opportunities which are extremely limited for daytime warming centre operations. We encourage the Province to take this into consideration as part of our overall commitment to the needs of residents.

- F) The City works to identify and bring illegal suites into compliance with code requirements in order to ensure that the suite is permitted and is safe for the residents dwelling within it. Until such time as building permit requirements have been met these units are not considered habitable and should only be counted as a unit once permits are issued, and therefore be applicable towards the target count only at that time. Unpermitted residential construction should not be considered housing, as it has not been verified that the construction is compliant with British Columbia Building Code requirements established by the Province.
- G) Staff have expressed concerns with the timing of the initiation of this second cohort of municipalities in the Housing Target process. As an organization with limited capacity, introducing additional work at the same time as the required deadlines for the implementation of the SSMUH zoning bylaw updates, our staff were already working at maximum capacity. The introduction of this additional work would have been better supported by staff following the SSMUH June 30th deadline.

We anticipate that the timing of the 6 month reporting will align with the Interim Housing Needs Report deadline. These requirements all become layers of additional work above the current application volume that staff are managing. With the adoption of the SSMUH zoning bylaw update pending, future application volume as a result of these changes is unknown and may further impact staff capacity.

We believe that the Province's desire to increase housing units lacks proper understanding of the challenges that a small local government faces, where the staff have broad portfolios and multiple responsibilities, which encompass areas where larger organizations have more depth and capacity to manage.

SSMUH zoning updates require the City to permit 6 units in an area of the City that is topographically challenging, and as a result is already an area where parking challenges exist. The City is disappointed by the lack of ability to require minimum parking standards for this type of housing, especially on our hillsides, and believes while some flexibility is allowed for siting standards, the standard approach being applied by the Province will prove to be detrimental to a community as unique as White Rock.

The prohibition on Public Hearings for SSMUH leaves no opportunity for the public voice to be considered, as would typically be allowed under Provincial legislation. The public hearing process was established by the Province decades ago, and is ingrained in the development approval process. It should not fall on the shoulders of local governments to have to communicate to the public that their voices cannot be heard at bylaw consideration. We would like to see a more robust communication campaign from the Province on both SSMUH requirements and on the Housing Target process.



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- H) Further, we would like to address the Province's need for confidentiality in this process. We do not feel that the information shared is such that it needs to remain confidential and by doing so has limited the City's ability to communicate with its residents on the matter of housing targets. We believe that being transparent about the process with local governments would enable upcoming cohorts to better prepare for the process and have a better understanding of the provincial expectations when it comes to housing targets generally. We feel this would foster a stronger relationship between local governments, their citizens, and the Province, and would help to align common goals regarding housing opportunities. Council's inability to express to the public that SSMUH will help achieve housing targets has hindered opportunities for transparency with the public.

On behalf of Council, I am grateful for the opportunity to comment on the draft Housing Targets, and the process generally. Housing is an important issue in White Rock, and is much needed as the population of BC grows. However, the provision of housing should be approached with the application of good planning principles and thoughtful consideration of the local context. The City of White Rock supports a collaborative approach between the Province and local governments as we move forward to address the housing need.

Sincerely,

Mayor Megan Knight
City of White Rock

cc: Chief Administrative Officer
Director of Planning and Development Services
White Rock City Council