



The Corporation of the City of Courtenay

What We Heard Report

To: Council

File No.: 6480-20-2403

3360-20-2409

From: Director of Development Services

Date: April 2, 2025

Subject: Development Permit Area Amendments for Small-Scale Multi-Unit Housing

INTRODUCTION

At the November 13, 2025 regular meeting, Council approved the Development Permit Area Amendments for Small-scale Multi-unit Housing – Consultation Plan and gave direction to proceed with consultation on the proposed changes to the City's form and character development permit areas to align with provincial policy direction for Small-Scale Multi-Unit Housing (SSMUH).

The objectives of this consultation process are:

- To establish a process to share applicable information and to receive input from interest holders such as local residents, development professionals, other local governments and K'ómoks First Nation.
- Provide an opportunity to identify and learn about issues relating to development approval processes and gain insights.
- Communicate the outcomes of consultation to the public and City Council to help inform decision-making about the proposed bylaw amendments.

This was achieved through the use of diverse engagement tools including: interactive webpage, in-person meetings, public survey and social and print media.

SUMMARY OF ENGAGEMENT

To raise awareness and seek community feedback on the proposed changes to the form and character development permit areas (DPA-1 and DPA-2), a series of social media posts, online, print advertising and email notifications to local developers was employed to encourage participation in the in-person meetings and public survey. Notification was also provided to applicable local governments and K'ómoks First Nation.

Engage Comox Valley (<https://engagecomoxvalley.ca/courtenay-ssmuh>)

A new online public platform, Engage Comox Valley, hosts the project webpage entitled: "Small-scale, Multi-unit Housing Development Permit Area Amendments". The webpage was launched January 17, 2025 and contains copies of the proposed DPAs, contextual information, FAQs, relevant documents, a timeline and contact information. As of the date of this report, the webpage received 692 views, 605 visits, 378 visitors, 44 contributions and six followers. Report on the webpage metrics attached as **Schedule 1**.

Development Professionals Meeting (February 5, 2025)

Development professional meetings are already routinely held by Development Services staff, creating an opportunity to focus on the SSMUH DPA amendments. The meeting was held at the Courtenay & District Museum and was well attended with 40 participants. The meeting consisted of a short presentation, copies of the proposed changes were circulated and participants were invited to dialogue. Key themes from this

dialogue where available space for building in the City, costs of development (not necessarily related to development permitting), and time (both in relation to development permits and other processes like subdivision). One notable comment was by creating more flexible guidelines this may increase uncertainty; differing interpretations of the guidelines which may contribute to time delays in processing development permit applications. Some of the concerns identified were then used to inform the development of the public survey to gain broader community input. Key themes from this meeting are provided in **Schedule 2**.

Public Open House (February 27, 2025)

A public open house was held at the Florence Filberg Centre February 27, attended by ten people. Following a short presentation by staff, participants were invited to ask questions, view the information boards, provide written or verbal comments on the proposed changes and complete the public survey. Four comments were posted on an 'ideas board', advocating for tree preservation, small homes for street character, natural drainage, and off-street parking. Spoken comment themes included property value impact, heritage protection, parking and property tax impact of servicing. Key themes from the open house are provided in **Schedule 2**.

The event was advertised in the Comox Valley Record February 12 and 26 along with a media release distributed February 13 and published in the Comox Valley Record February 26, and the following social media posts:

- Facebook posts February 13, 23, 28;
- Facebook event with ad boosts February 19;
- Instagram posts with stories February 13, 23, 28; and
- Twitter/X February 13, 26, 27, 28.

Intergovernmental and Interjurisdictional Consultation (February to March 2025)

Courtenay's City Manager engaged with K'ómoks First Nation senior staff and provided briefing notes on the SSMUH Development Permit Area Amendment project and three other City projects on February 15. In addition, formal notification letters were sent to the Planning Departments at Comox Valley Regional District, the Town of Comox, the Village of Cumberland, Island Health and School District No. 71 on February 24. The Town of Comox and the Village of Cumberland provided an update on similar work in their communities. The CVRD provided a written referral comments expressing their support. An additional, the notification letter was forwarded on February 28 to the CVRD Liquid Waste Services for consideration against the Regional Liquid Waste Management Plan.

Public Survey (February 12 to March 4, 2025)

The public survey had 44 responses; 43 each from unique IP addresses and one of the responses was submitted by paper at the public open house and input online by staff. Of the 44 responses, 39 report living or owning a home in Courtenay (32 living, 29 owning) and ten report planning to add one or more homes to their property (three responses) or being a development professional (seven responses). The survey format was a combination of scaled questions and comment.

Staff note that respondents were able to self-identify in more than one way (I live in Courtenay, I own a home in Courtenay, I am a developer, etc.). Staff analysed the 'raw' survey data and categorized the results into respondent groups (City Residents and Homeowners and Development Industry or Planning to Build).

Acknowledging the survey sample is relatively small (44) and only represents a point in time it is not possible to identify trends. Instead, observations of the results are provided below and in more detail in **Schedule 2**.

Survey Question 1: Which of the following describe you?

Of the 44 total responses, 32 live in Courtenay, 29 own a home in Courtenay, three are planning to add one or more homes to their property (all local homeowners), and seven are development professionals.

Survey Question 2: Potential Development Permit barriers to building small-scale multi-unit housing

On a scale from 1-5 where 1 means presents no challenge and 5 means extremely challenging, about 1/3 residents/owners reported being unsure for most factors and the rest on average about 3.1-3.6 (so moderate impact). By contrast there was no uncertainty reported among the developer group (including prospective developers of their own lots) and all factors averaged over 4, the highest being “cost to meet current development permit guidelines” (4.7) and “time needed for the development permit process” (4.6). “Clarity of the development permitting process”, “clarity of the current development permit guidelines” and “space needed to meet current development permit guidelines” were reported as slightly less challenging.

Observations:

Cost and time associated with the development permitting process and time are concerns for both respondent groups. Development Industry or Planning to Build group ‘scored’ slightly higher. Eight written responses offer themes such as consistency, priorities, neighbour concerns and timelines.

Survey Question 3: Other potential barriers to building small-scale multi-unit housing

On a scale from 1-5 where 1 means presents no challenge and 5 means extremely challenging, about 1/3 residents/owners reported being unsure for most factors except for “current market conditions” (only six of 39 in the group unsure). This factor averaged 4.2 with all others again at 3.1-3.6. The developer group again reported no uncertainty. It scored “current market conditions” and “BC Zero Carbon Step Code” equally as most challenging at 4.2, followed closely by “infrastructure costs and availability” (4.1), “BC Energy Step Code” (3.9), Zoning Bylaw (3.6) and “other provincial requirements” (3.3).

Observations:

City Residents and Homeowners ‘scored’ current market conditions the greatest challenge, while the Development Industry or Planning to Build group considered infrastructure costs, BC Energy Step Code and BC Zero Carbon Step Code as similarly challenging to market conditions. Five written responses discuss land availability, tax impacts, and interest rates. These factors overall scoring lower than the Development Permit-related factors highlights the importance of amendments.

Survey Question 4: Building form and character

On a scale from 1-5, 1 means a form and character development permit should not be required for each of 10 specified development types or situations and 5 means it should be required.

Observations:

- City Residents and Homeowners group generally in favour of requiring development permits more than were the developer group (scores of 3.0-3.9 vs. 1.6-3.0).
- Development Industry or Planning to Build group expressed some support for requiring form and character development permits for three or more units, but strongly opposed requiring DPAs for two or fewer units. This aligns with proposed change.
- Both groups, low support for requiring form and character development permits for “all accessory dwelling units” and “two principal single residential houses on a property with no other residential units”.

- “All duplexes” was next least supported by Development Industry or Planning to Build group, scoring 1.8, whereas among the resident/owner group other development types which might have more units including “duplexes with a secondary suite and/or accessory dwelling unit” unexpectedly scored lower, perhaps suggesting the question could have been worded more clearly.
- Among both groups the highest-scoring category was “For more types of infill dwellings in the Old Orchard, Terminal Addition or 40 Houses neighbourhoods than in other areas” (3.9 and 3.0).
- “For any third residential unit on a property, including an Accessory Dwelling Unit (i.e., lane way or carriage house)” had the next highest score for the developer group at 2.9 (3.7 for residents/owners).

Survey Question 5: Balancing objectives – have we got it right?

On a scale from 1-5 where 1 means proposed DPA-2 guidelines for a given theme are too flexible and 5 means too rigid, residents/owners generally viewed them as more flexible (2.6-3.4) than did the developer group (3.3-3.9).

Observations:

- Neither group on average scored proposed guidelines on any theme as being far too flexible or rigid.
- Both the resident/owner and developer groups reported “40 Houses Neighbourhood” (2.6; 3.4), “Mobile Home Parks” (2.6; 3.3) and “Old Orchard and Terminal Addition Neighbourhood” (2.7; 3.4) as the most overly flexible.
- “Landscaping” (3.4; 3.8) and “building design” (3.2; 3.9) guidelines were seen as least flexible, and “site planning” (3.0; 3.7) and “public realm and streetscape” (2.8; 3.5) the most balanced.

Survey Question 6: Additional Information

At the end of the survey respondents were asked to share any other ideas or comments related to the topic area. 22 written responses were submitted on a wide variety of themes including: landscape deposit time, tree retention and height, gardens, urban farms, wood and gas heating, visual character, property taxes, homeownership, housing size and quality, rent prices, public accountability, parking, fire risk, privacy, views, wildlife, heritage areas, and the appropriateness of small-scale multi-unit housing zoning and infill development in general. Some of the comments received fall outside the scope of the topic area, ranging from infrastructure and development to community services and provincial legislation.

NEXT STEPS:

The outcomes from the engagement activities were used to inform and refine the proposed changes to the development permit areas. The revised text is anticipated to be finalized through the OCP/Zoning Bylaw amendment process scheduled for Spring 2025.

SCHEDULES:

Schedule 1: Engage Comox Valley, Project Webpage Metrics

Schedule 2: Summary of Public Engagement

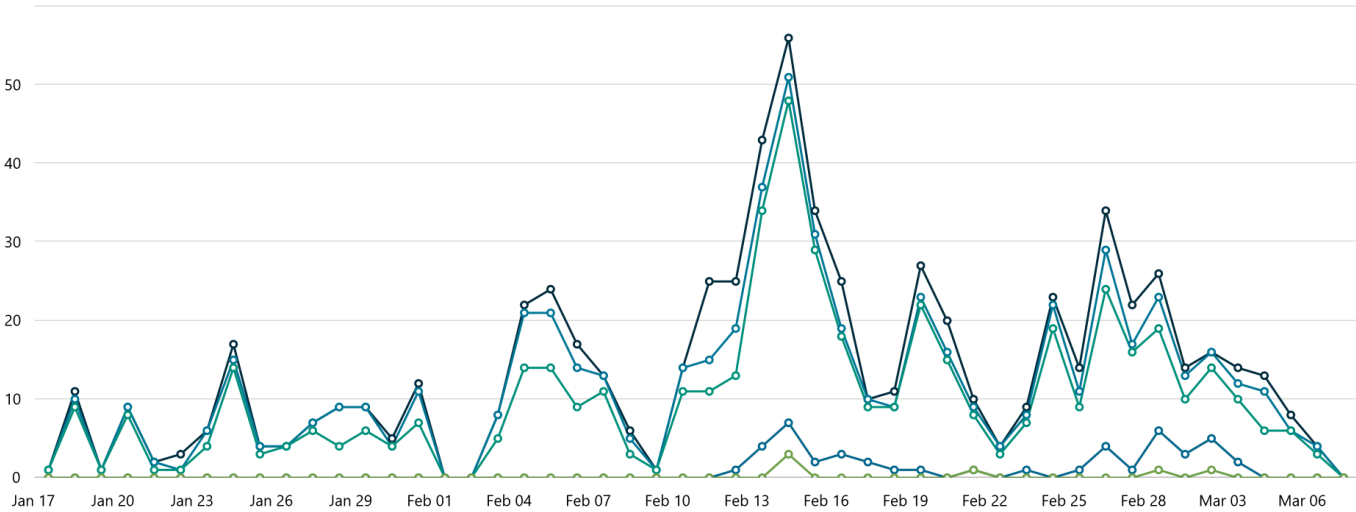
Prepared by: Mike Grimsrud, RPP, MCIP, Planner III

Reviewed by: Jamai Schile, RPP, MCIP, Manager of Development Planning
Marianne Wade, RPP, MCIP, Director of Development Services

Concurrence: Kyle Shaw, Director of Operational Services – Acting City Manager (CAO)

Performance Summary

Information regarding key visitation and utilisation metrics for your Site or projects.



692
Views

605
Visits

378
Visitors

45
Contributions

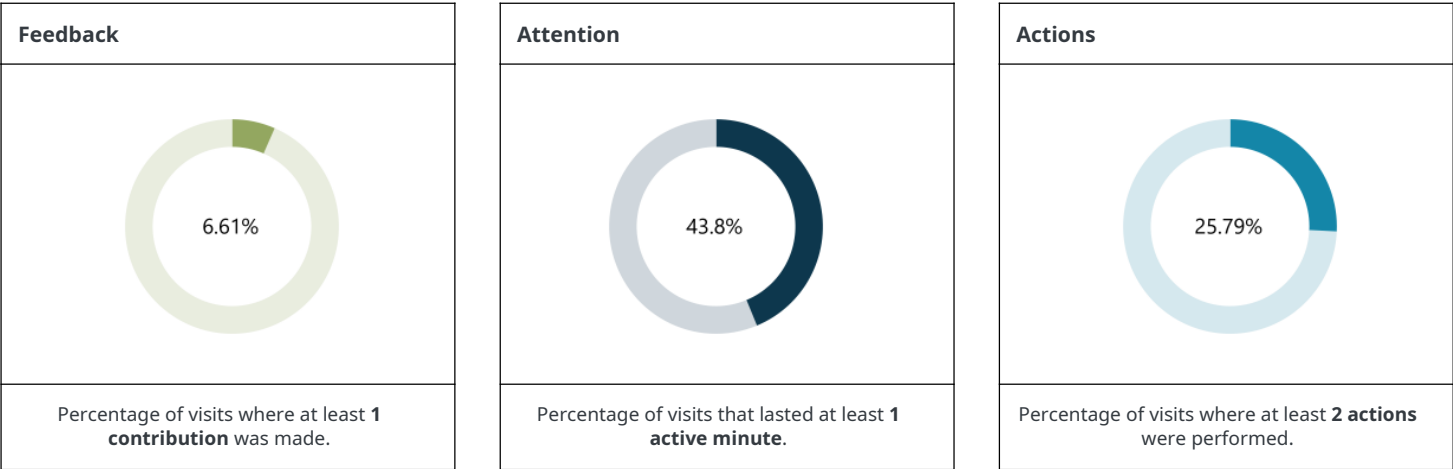
43
Contributors

6
Followers

Views - The number of times a Visitor views any page on a Site.
Visits - The number of end-user sessions associated with a single Visitor.
Visitors - The number of unique public or end-users to a Site. A Visitor is only counted once, even if they visit a Site several times in one day.
Contributions - The total number of responses or feedback collected through the participation tools.
Contributors - The unique number of Visitors who have left feedback or Contributions on a Site through the participation tools.
Followers - The number of Visitors who have 'subscribed' to a project using the 'Follow' button.

Conversions


Information regarding how well your engagement websites converted Visitors to perform defined key actions.



Participation

Information regarding how people have participated in your projects and activities.

Contributions by Activity			
Contributions by Activity is a breakdown of contributions across each tool			
Activity		Contributions	%
<div><div></div></div> Form	45	<div></div>	100%

Top Activities				
Top Activities is the top 5 tools that received the highest contributions				
Activity		Page Name	Contributions	Contributors
	Form	Small-Scale Multi-Unit Housing - Development Permit Area Amendments	45	43
	Form	Small-Scale Multi-Unit Housing - Development Permit Area Amendments	0	0

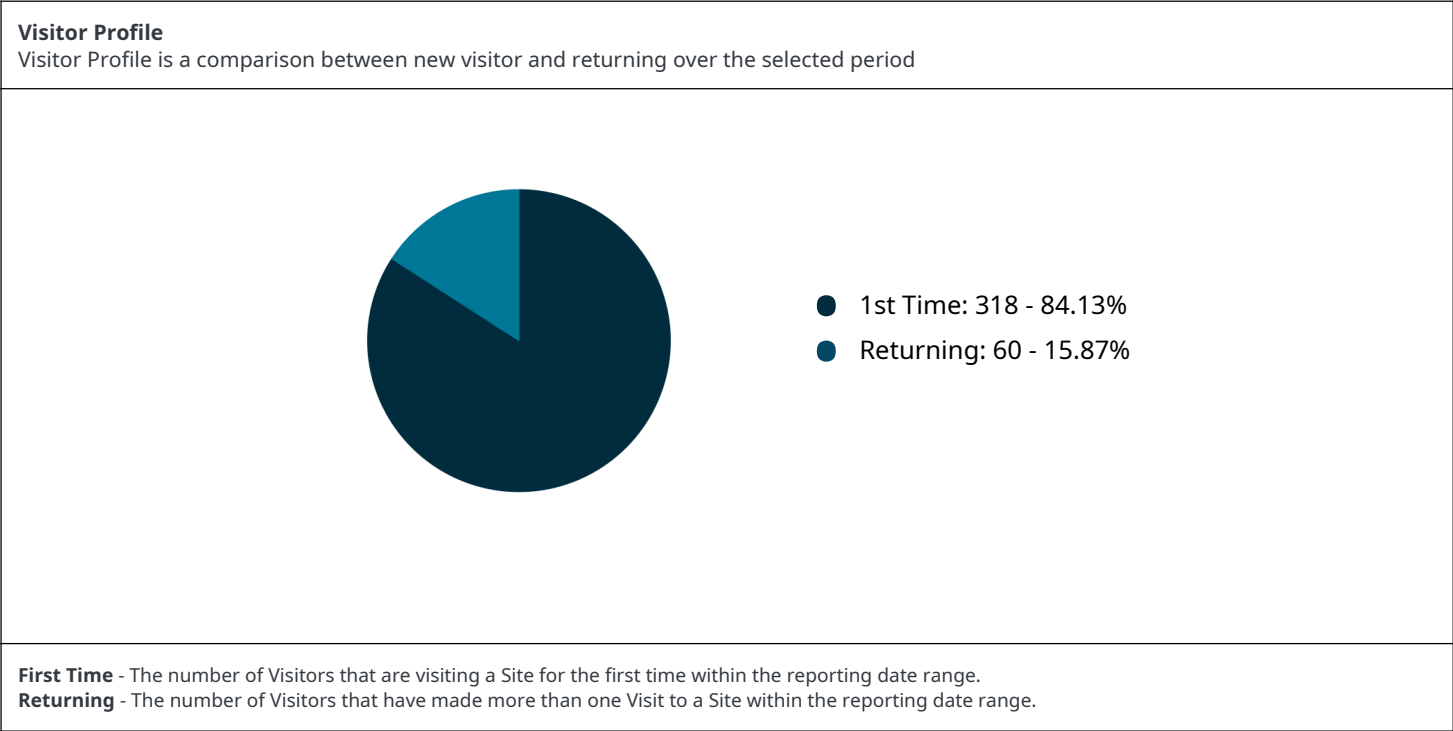
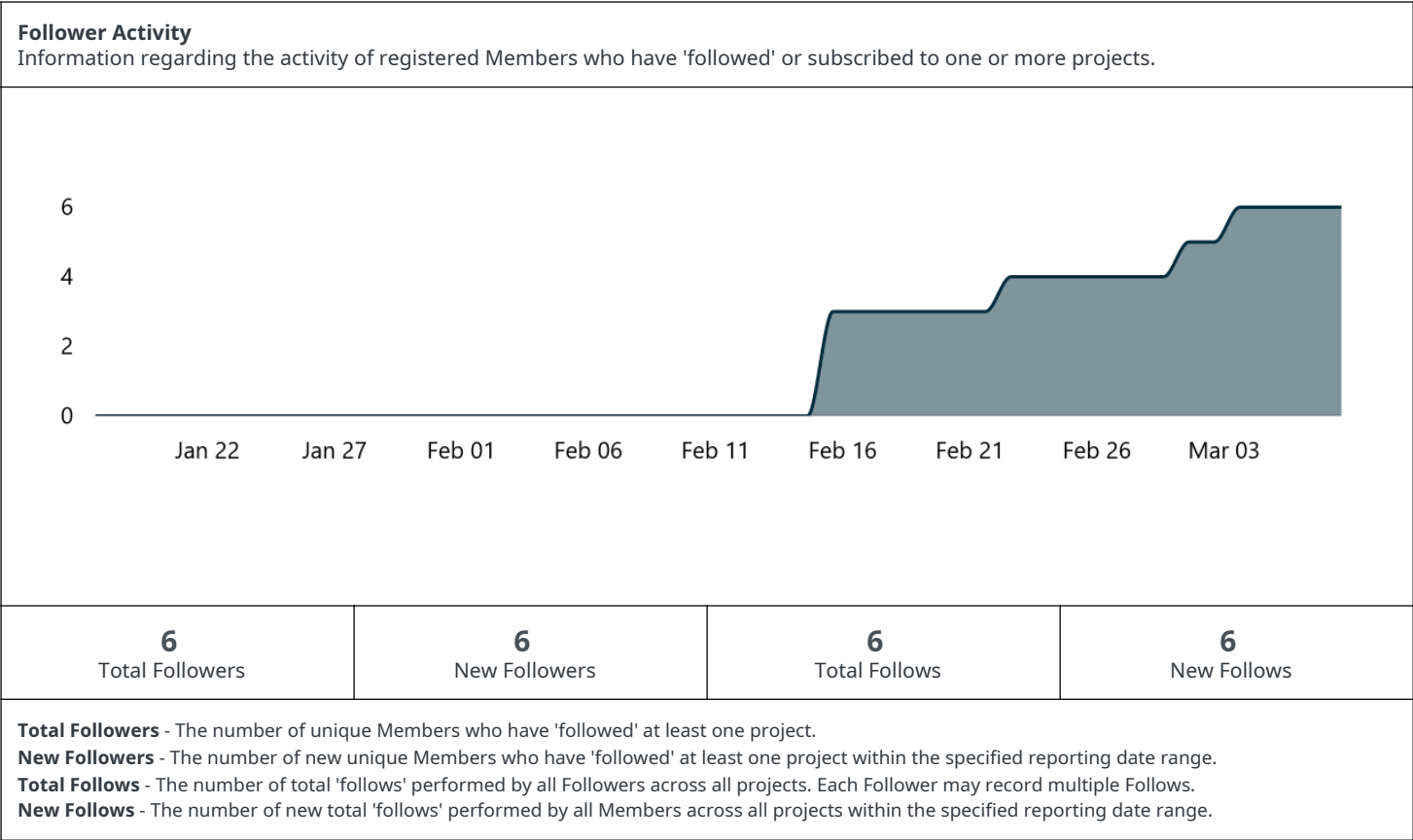
Projects

The current number of published projects on your site

Engagement Time			Top Visited Pages			
<div><div>0</div><div>Days</div></div> <div><div>20</div><div>Hours</div></div> <div><div>38</div><div>Minutes</div></div>			Summary information for the top five most visited Pages.			
			Page Name	Visitation %	Visits	Visitors
			Small-Scale Multi-Unit Housing - Development Permit Area Amendments	100%	603	378
<div><div>Feb 14th 2025</div><div>Peak Visitation Date</div></div>		<div><div>Friday</div><div>Peak Visitation Day</div></div>				

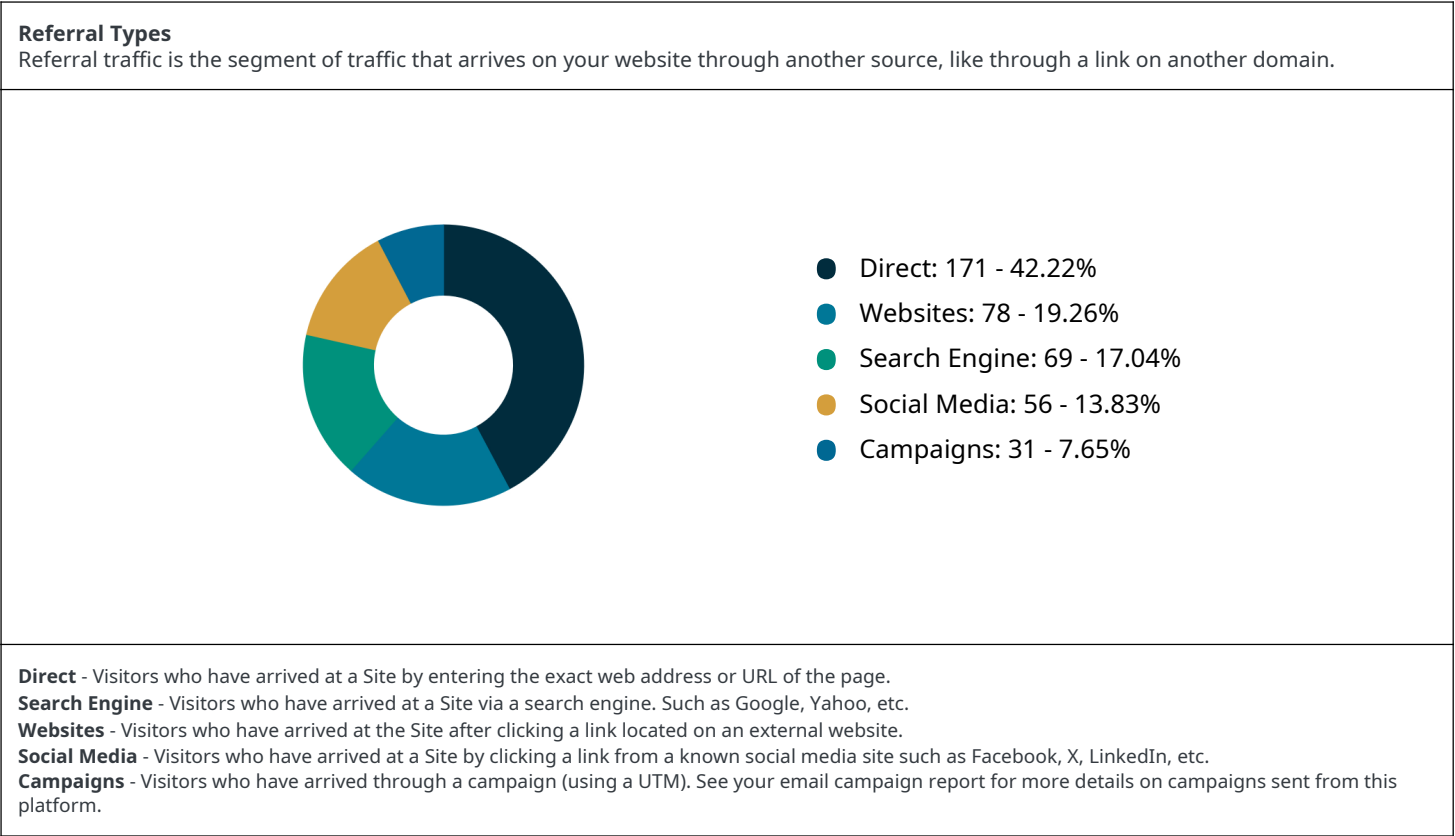
People

Information regarding who has participated in your projects and activities.




Acquisition

Information regarding the method by which Visitors arrived to your Site or projects.



Downloads

Information regarding your downloads, the total set of unique documents downloaded, total downloads of all files, and your top downloads.




96
Total Downloads


Top Downloads		
Top file downloads in your selection, ordered by the number of downloads.		
File Title	File Type	Downloads
Proposed DPA-2 Text with Change Summaries.pdf	PDF	33
Development Permit Area amendments for Small-scale Multi-unit Housing - Consultation Requirements.pdf	PDF	22
DPA-1 Proposed Justification and Objectives.pdf	PDF	18
Attachment 1-Consultation Plan.pdf	PDF	10
ssmuh_provincial_policy_manual-compressed.pdf	PDF	8

Email Campaigns


Information regarding your email campaigns, your total campaigns, the total number of recipients, and your top campaigns by click-through rate (clicks as a percentage of total recipients).



1
Email Campaigns Sent



31
Total Recipients



29.03%
Click-through Rate

Top Campaigns			
Top email campaigns that have activity in your selection, ordered by click-through rate (clicks as a percentage of total recipients).			
Campaign Name	Recipients	Clicks	Click-through Rate
Small-Scale Multi-Unit Housing - Development Permit Area Amendments	31	9	29.03%

What We Heard Report on Form and Character Development Permit Areas

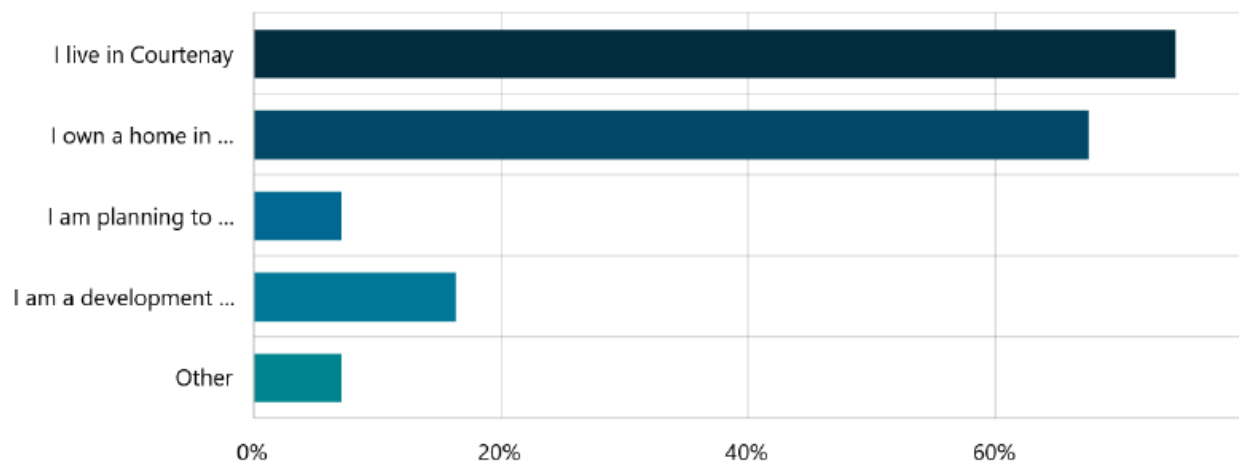
Schedule 2: Public Feedback

SURVEY QUESTIONS AND RESULTS

Question 1 summary data below are provided directly through the Social Pinpoint Engage Comox Valley platform. For subsequent questions, corresponding summary data is available in the What We Heard Report Schedule 3 but do not differentiate between respondent groups. They also present a potentially misleading “score” which averages response scores and treats “unsure/no opinion as a “6”. To address this for subsequent questions presented below, staff summarized and graphed detailed survey data separately for those who live and/or own a home in Courtenay and for those planning to add one or more homes to their property or identify as a development professional. Staff used disaggregated data from the Social Pinpoint Engage Comox Valley platform that gives each survey respondent a unique Contribution ID and attaches responses to respondents.

The 44 responses are not intended to be statistically significant and do not track trends over time but can suggest potential tendencies or key themes.

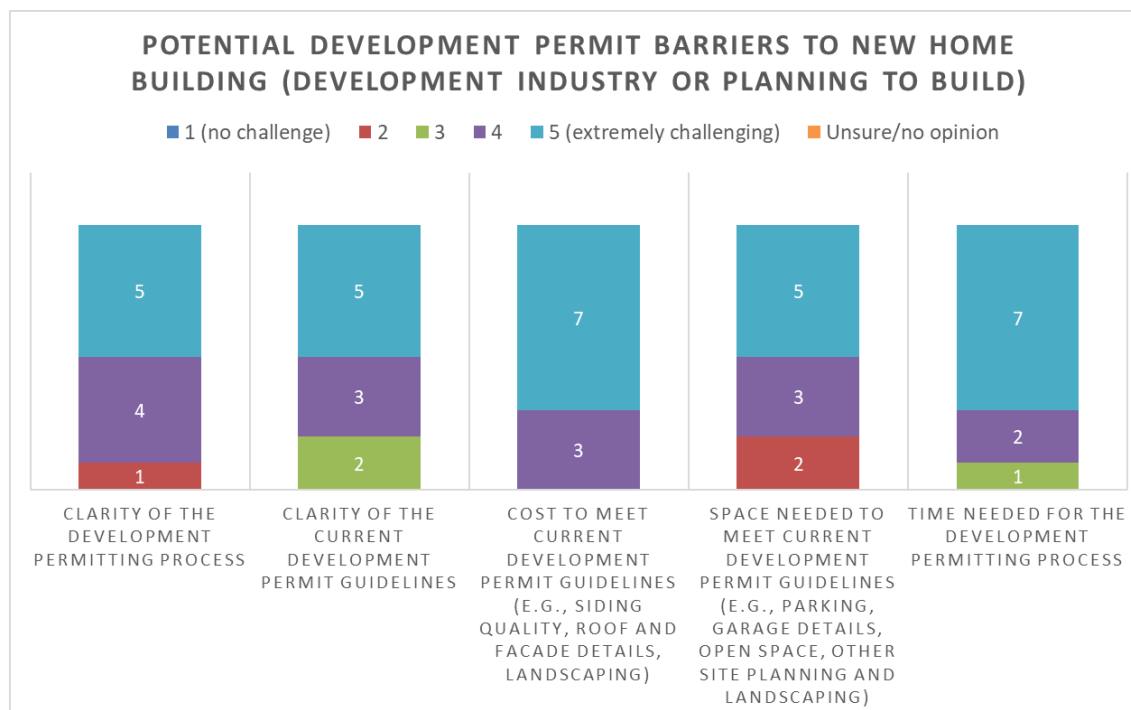
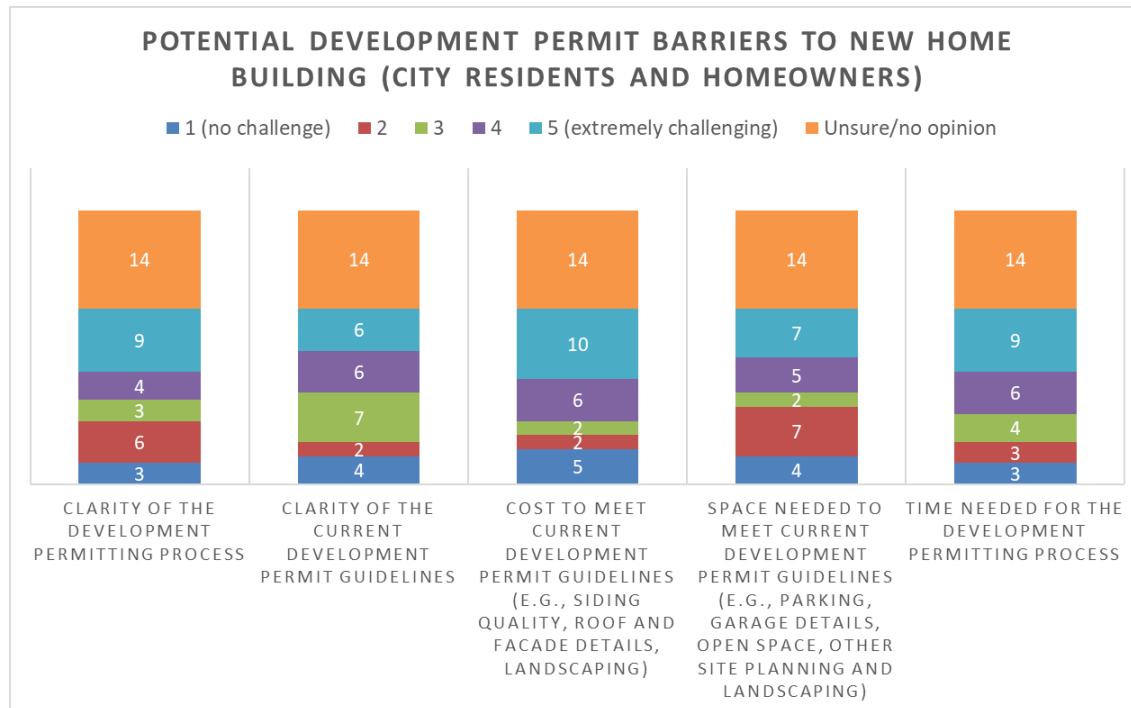
Q1. Which of the following describe you? Please select all that apply.



Answer choices	Percent	Count
I live in Courtenay	74.42%	32
I own a home in Courtenay	67.44%	29
I am planning to add one or more homes to my property	6.98%	3
I am a development professional	16.28%	7
Other	6.98%	3

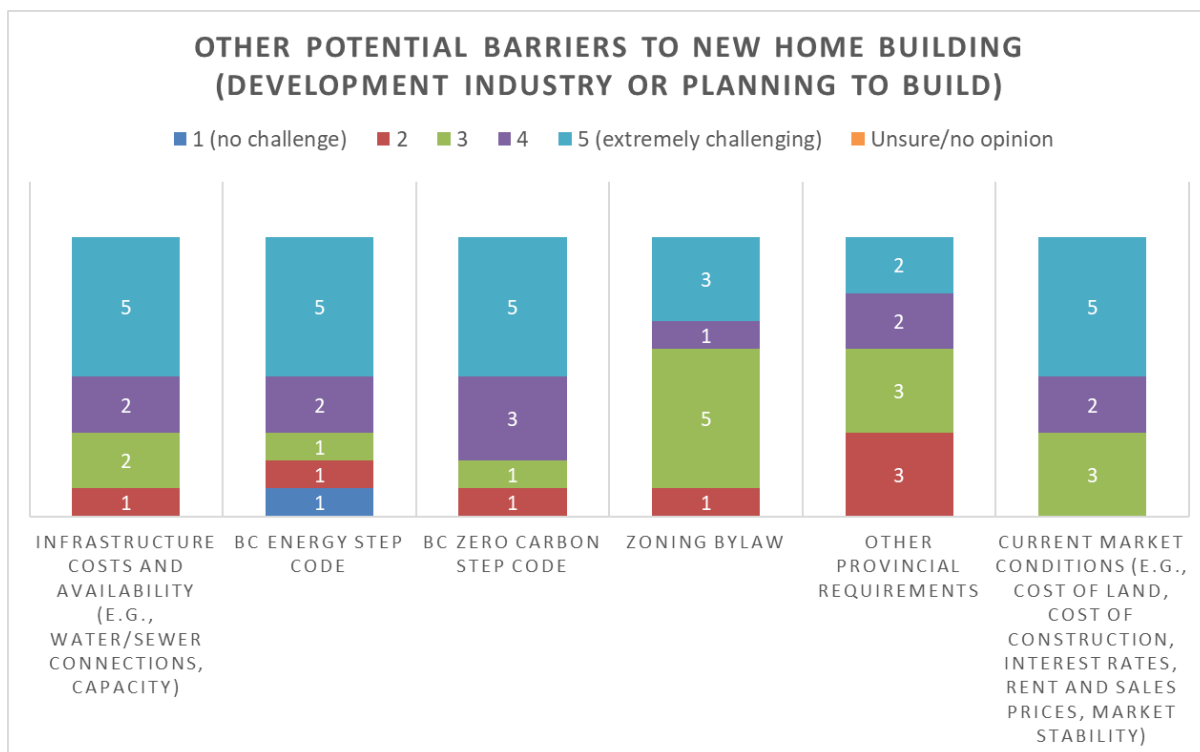
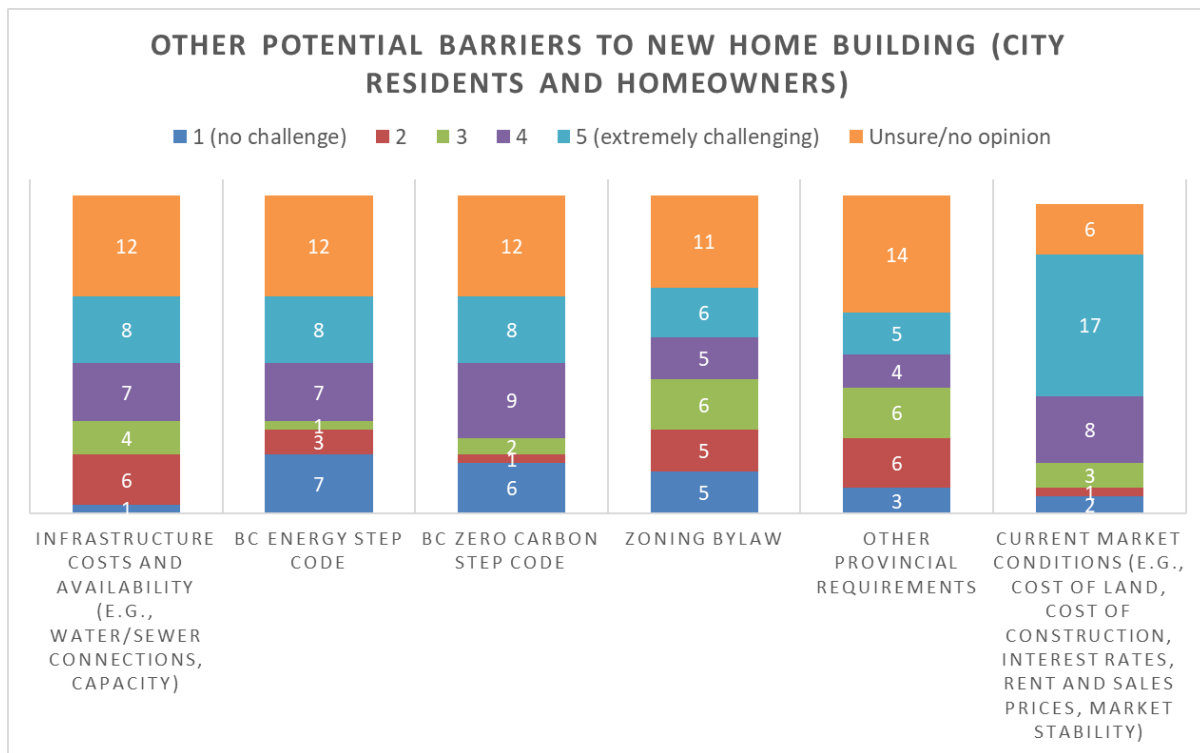
Q2 Potential Development Permit barriers to new home building

Building a home can be exciting, but it also has its challenges. How challenging are the following development permit-related factors for building small-scale multi-unit housing in Courtenay? Please answer on a scale from 1 to 5 where 1 means presents no challenge and 5 extremely challenging, or select “Unsure / no opinion”.



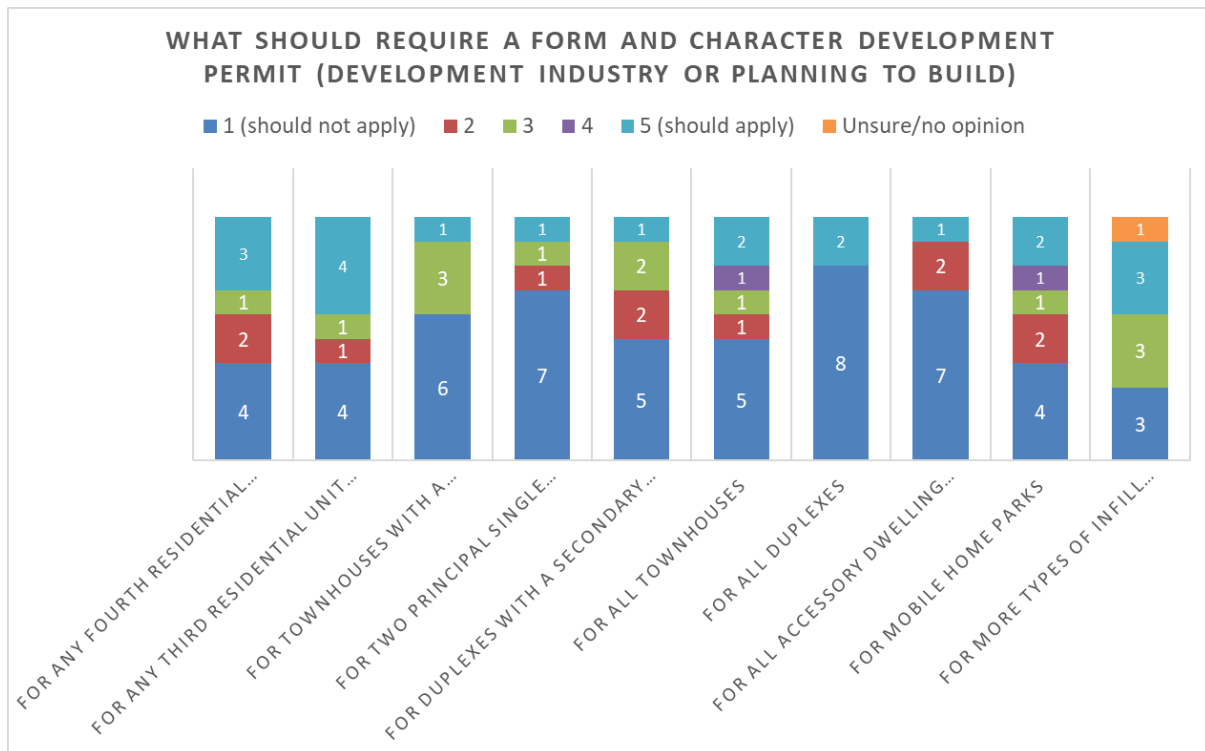
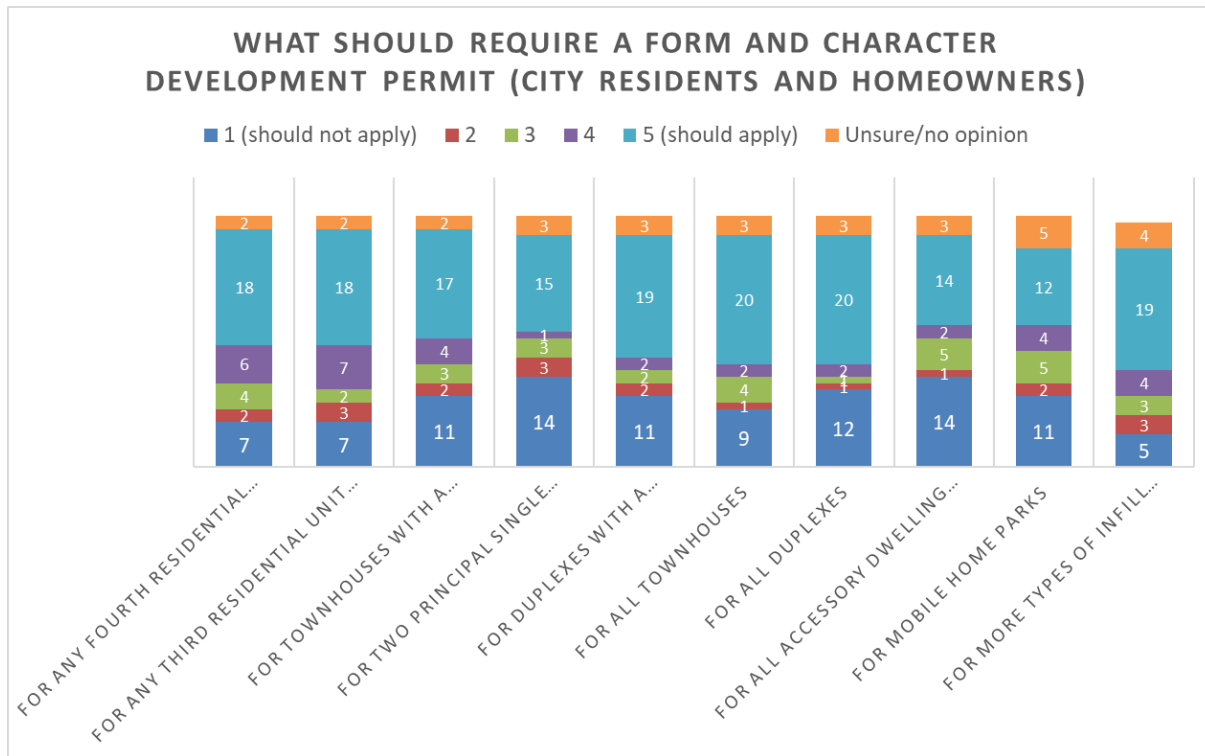
Q3 Other potential barriers to new home building

How challenging are the following contextual factors for building small-scale multi-unit housing in Courtenay? Please answer on a scale from 1 to 5 where 1 means presents no challenge and 5 extremely challenging, or select “Unsure / no opinion”.



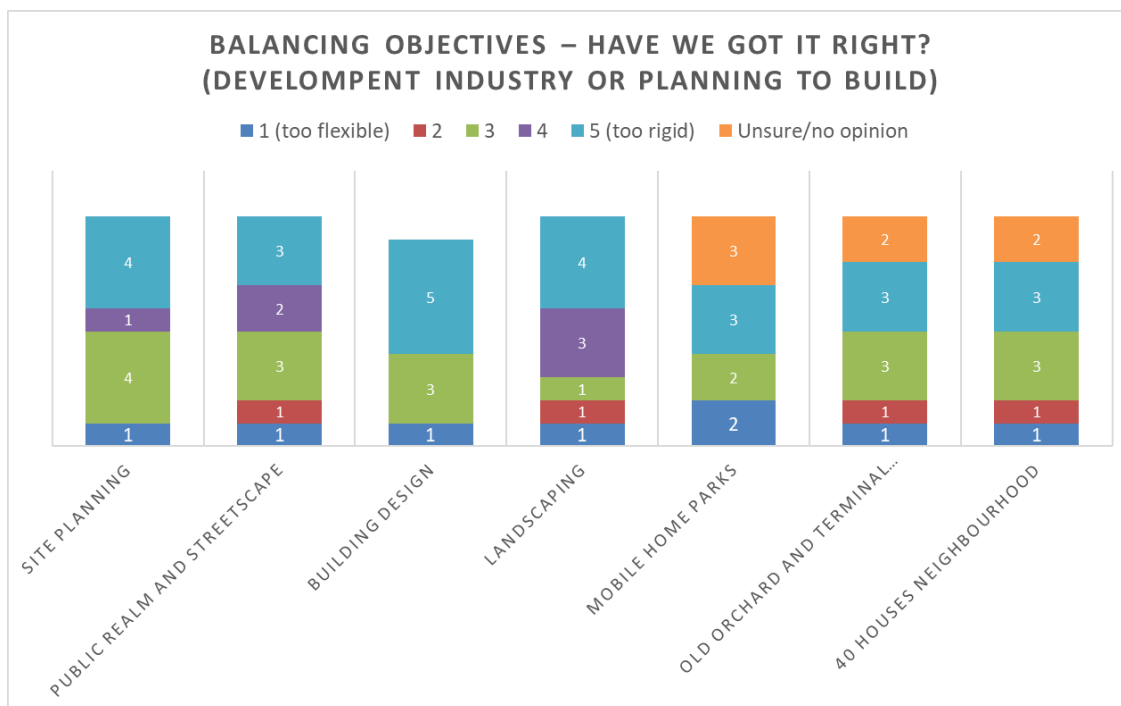
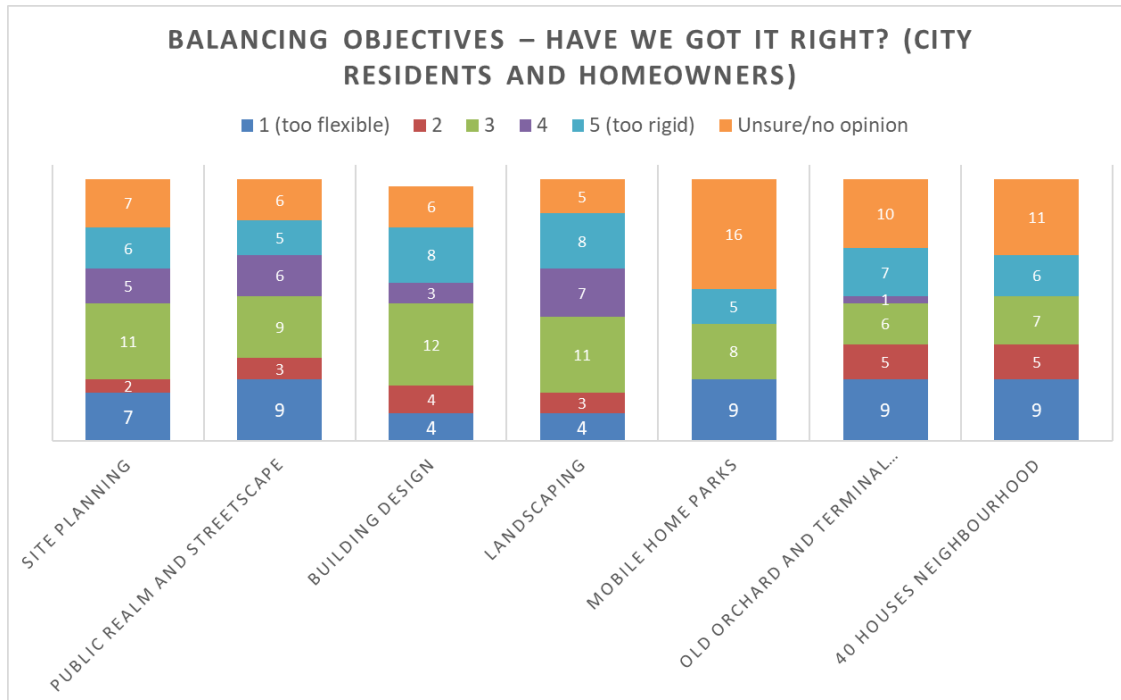
Q4 Building form and character

The proposed DPA-2 is for three or four homes. What types of small-scale housing development do you think should require a form and character development permit? Please answer on a scale from 1-5 where 1 means should not apply and 5 is should apply, or select "Unsure / no opinion".



Q5 Balancing objectives – have we got it right?

The proposed changes are intended to provide more flexibility to promote creative building designs on a residential lot for transition to surrounding lots. This is to address concerns of landscaping, privacy, parking, and garbage location while respecting the sustainability goals outlined in the Official Community Plan (OCP). How well do you feel the proposed changes achieve this balance for small-scale, multi-unit housing? Please answer on a scale from 1 to 5, where 1 means proposed guidelines are too flexible and 5 means too rigid, or select “Unsure / no opinion”



SURVEY WRITTEN COMMENTS

Self-Identified as “Courtenay Residents or Property Owners” (39 respondents):

Which of the following describe you? (1 written response)

- Comox valley born and never left. But lately seriously considering it...

Potential Development Permit barriers to new home building (7 written responses)

- Form and function should not be a priority during a housing crisis. Infrastructure and planning is needed to allow people to build more homes. Relying on demolishing current single-family homes to build multi family is not the answer
- Timelines, process and costs to homeowners outweigh benefits of increasing density on property
- Dumpster fire bad service
- City don't enforce their bylaws because they intimidated by some developers
- I am a renter for the time being.
- City gets what it wants regardless what the people want and disregards actual laws
- Opposition from neighbours needs to be factored in and consideration of their concerns

Other potential barriers to new home building (4 written responses)

- I'm sorry but extremely challenging to all of these
- I believe that the existing taxpayers will end up with an onerous property tax burden for this type of development. Both the City and The Province seem to not grasp the reality that adding more homes drives up taxes. It does not reduce any costs. Pushback
- Interest rates are too low lower make them higher the cost of buying the house only goes up as interest rates go down defeating the purpose
- City holds meetings to save face, and follows through with their own agenda at the cost of taxpayers

Additional Information (19 written responses)

- I would like to see flexibility on the types and configuration of them. Allow for 4 dwellings as is recommended. Allow for flexible design and site planning. Some properties with a single-family home can accommodate an additional duplex type carriage home and a small cabin for a single person. Etc. accommodation for people who want to just provide a rental with bike parking only
- The province has recently starting to appoint housing consultants to municipalities that aren't moving the needle. City of Courtenay does not want that but maybe they could learn a few things about getting out of the way of homes being built
- If I understand them correctly, the proposed changes continue to promote form-and-character requirements for new construction, while also reflecting the province's intent to see a streamlined application and approval process. It appears to be a good balance.

- Limit tree height to ensure solar gain and wind access
- Nowhere in this survey is it recognized that people living in the Comox Valley do so on the unceded territory of the K'ómoks First Nation. The closest it gets is the non-descript "Other Provincial Permitting" which, for those who aren't in the know, includes First Nations and BC Archaeology Branch permits.
- Maintain old trees within an "Older" neighbourhood. Thank you for making an effort to create densification within the urban environment, and to partner this with increased Transit options. I do believe that careful attention to the "look" of a neighbourhood, is important. Too often really "ugly" development is allowed to take over a huge development area (such as the Duplexes in Puntledge area; with no trees, and no eye for design. Slowly, very slowly that area improves, but growing trees takes a long time)
- In general, there should be adherence to requirements if the unit is detached and/or a third unit on the property.
- Courtenay is a small City and does not need this type of senior government interference. I have seen nothing to date that would lead me to believe that the City would work on creative (i.e.: Good looking) developments.
- By the looks of it, it's good to put a bigger burden on the homeowners not the developers. Bus service is a losing proposition. It will be paid by homeowners not the developers property taxes are going up faster than ever, even though developers are building more than ever???
- Please design these building with gardens in mind. I do not wish for community gardens but my own place in all building and floors to have such an area. I also would like to hang my clothing outside instead of using my dryer or coin operated machine. I also would like to see all the would burning fire places be up to modern standards, including their chimneys. I want people to not miss represent them showing them in a bad light, as I prefer woodstoves over gas for heating homes.
- City needs to ensure the housing going up is somewhere they would actually want to live in. Crappy squeezed spaces that are only intended to be eaten up as rental and "investment" properties have no place in this community. People should have a right to own the space they live in. The majority of citizens will remain living hand to mouth and struggling so long as they new projects are money grabs for those who already have housing and keep rents unaffordable. Cost of living can only come down when housing is owned by those living in it. "Investors" can't keep profiting off of people's basic human need for shelter. Please ensure what permits go out are for duplexes and townhouses which are sold to first time buyers or those with intent to actually live in them
- People should be able to do what they want on their on property they OWN. That being said, housing that is being supplied is not affordable nor accommodating to people. Everything is SO SMALL. And cheaply made. And costs up to and often more than 2/3's of peoples incomes. You are not creating solutions but more problems. You build things to cater to people moving here with money that they couldn't make here and most don't even get jobs here. That's what is happening in the Valley. Screw everyone who was already here and despite working full time cannot ever afford to own anything here. No one should pay \$2300 for a 2-bedroom tiny box, then also pay for a \$250+ storage unit. Then you are charged for parking or there isn't ANY

available. Tiny half sized washers and dryers to fit in the tiny boxes so you have to outsource some of your laundry. That costs more again. I am so sick of the city of Courtenay and their awful decisions. So glad I don't own here and don't contribute taxes to fund your insanity that you call solutions.

- I am for the proposed changes to DPA-2 I just hope they don't negatively affect environmental sustainability and accessibility in design.
- Listen to the public for once. Supreme Court has ruled that no warming/drug areas are to be near schools or daycares. Yet the city figures that rule doesn't apply and approved Braidwood site. Can wait to see the city go to court. Fire the mayor and everyone who approved that and the 5th and 17th street disaster
- Any building like the dwellings on 10th and England Ave should not be developed. The recent photos show a barely comfortable homes with no parking expect street (businesses suffer). I don't see anyone wanting or asking for these useless tight spaced, inconvenient swellings. They aren't good for families and are barely suited to students
- What about urban farm designations?
- My experience in jurisdictions with infilling is a profound DECREASE in quality of life for existing homes impacted by these changes. Loss of privacy, trees, nature, views, wildlife. Profound INCREASE in noise, disturbances, community. INCREASED risk of fires spreading from one home to another and another with devastating consequences. Environmental degradation. I am not in favour of this infilling.
- Maybe keep our character of the old places like 40 houses and Old Orchard. However, be bold and brave and creative everywhere else.
- Consider parking, density of people in a smaller area and balance that with the neighborhoods that people in surrounding houses have bought into. Progress should improve, not bring a ghetto-type situation into an established positive neighborhood

Survey respondents who did not self-identified as “Courtenay Residents or Property Owners” (5 respondents):

Which of the following describe you? (1 written response)

- Area b, on back Rd

Potential Development Permit barriers to new home building (1 written response)

- Unless your file goes to the most senior planner, its very frustrating. Planners seem to try to hold you to what the bylaw should be rather than what it is. This needs to be corrected.

Other potential barriers to new home building (1 written response)

- There is no land in Courtenay, what land there is, is extremely high risk due to Archaeology. The fees for DP's in Courtenay are outrageous. Easier to get land in Campbell River or Parksville and much more reasonable

Additional Information (3 written responses)

- 3 years for a landscaping deposit is just too long. Too much money sitting idle and an over reach.
- I do not feel that we need a DP for this at all. keep the old orchard and 40 homes DP. We are adding cost and road blocks when we need housing. The Planning department does not need more work! A simple checklist for the building permit that confirms civil requirements, landscape requirements etc. is enough. Give the frontline staff the power to approve projects quickly. Check the check list and get them out the door.

The intent of the regulations to make it easier to build up to 4 housing units on residential lots is contradicted by the number of proposed regulations. If the City wants allow developers to be creative in their designs there would be less proposed guidelines and regulations, not more. Adding additional processes to Small-Scale, Multi-Unit Housing (SSMUH) projects is contrary to the Small-Scale, Multi-Unit Housing (SSMUH) Policy Manual's guidance in section 6.1: "local governments are discouraged from using DPAs to control the form and character of SSMUH developments up to six units in all but exceptional circumstances." What exceptional circumstances (outside of the legislated heritage considerations) justify this DPA? Why are heritage considerations being mixed into the DPA for SSMUH?

The Policy Manual gives common DPA requirements that negatively impact the viability of SSMUH. Some examples are: location of entrances (in proposed changes, points 4, 12, 31); building height (in proposed changes, point 56); requiring transitions through massing (in the proposed changes, point 13, 17); attempts to mitigate impacts on immediate surroundings via shadow, solar impact, views, and privacy (in the proposed changes points 33, 3); parking and waste management (in proposed changes points 8, 20).

In Table 2 of the Policy Manual, several common zoning bylaw impediments are listed. One is "Limitations on the visibility or positioning of entrances for non-principal dwellings". This is included in the proposed changes in point 4. The recommended solution is to remove the regulations related to the position of entrances on non-principal dwellings. The Policy Manual does allow for voluntary, non-regulatory design guidelines, however the language in the proposed changes (i.e. shall) makes it appear to regulatory in nature. As well, guidelines in a regulatory vehicle, such as a DPA, tend to become less guidelines and more regulation.

Not only does the Policy Manual recommend against imposing additional processes on SSMUH projects, but it gives several principles for the effective use of DPAs. In other words, DPAs should be avoided, but when they cannot be they should follow these principles:

1. Provide clear direction and be specific: DPA guidelines should be clearly articulated to remove discretion over how they are interpreted and how the intent of the guidelines can and has been met.
2. Staff delegation: Authority to issue development permits should be delegated to staff under the provisions of LGA section 490(5) to improve consistency in the adjudication of applications and timeliness of approvals.

3. Advisory urban design panels/commissions: Ensuring SMUH projects are not subject to review by advisory design panels or planning commissions will help ensure expedient and consistent approvals.
4. Recognize constraints through permissive requirements: DPA guidelines should take into account the significant space-related constraints and limited financial viability for SSMUH housing forms and avoid the inclusion of requirements that are impractical due to these constraints.

The guidelines provided in the proposed changes are vague and staff would have wide discretion over how they are interpreted and what is accepted. This is directly contrary to the Policy Manual's principles for effective use of DPAs.

A simpler set of criteria that can be objectively graded or given a yes/no response will simplify the process, not just for City staff but for developers. It will allow developers to meet the guidelines easily and predictably. By giving the guidelines flexibility, you are increasing the risk that developers have during permitting, which will increase the cost of the development and therefore the cost to the consumer. Flexible guidelines will make development of SSMUH very risky for developers.

Flexible guidelines not only cause problems for the developers, but for City staff as well. With flexible guidelines, City staff will need to spend time justifying each development's approval or denial. What happens when one development is approved, and a similar one denied? Where will the line be drawn? As well, what happens when staff change and the opinions of what is acceptable change? The proposed guidelines run the risk of creating unreasonable restrictions on SSMUH developments.

It appears like the zoning regulations that were removed by provincial regulations are planned to be replaced by the proposed development permit area.

- I bought my home under assumption current zoning was not going to change. New areas can be zoned appropriately. This is not the provincial governments business.

OPEN HOUSE IDEAS BOARD COMMENTS

- Keep as much existing vegetation (trees) as possible
- Consider neighbourhood street "character". No "McMansions" in smaller house area
- Put emphasis on natural type drainage
- Please don't have density increases with only street parking

OPEN HOUSE SPOKEN COMMENT THEMES

- Impact on Property Value
- Heritage Protection
- Parking
- Servicing (existing residents/owners paying for water/sewer for new development)

DEVELOPMENT PROFESSIONALS' MEETING SPOKEN COMMENT THEMES

Land and Infrastructure

- Unsure where units will go
- Difficult to build large amount of SSMUH units & doubt SSMUH share noted in Complete Communities
- Concern about land and infrastructure availability and suggestion City should open large areas [areas designated Future Growth in Official Community Plan which require a Local Area Plan prior to rezoning]

Costs

- Price of single-family home doesn't allow to bulldoze and build a 4-plex
- Some rental units are empty because people can't afford high rents of new buildings
- Development Cost Charges (DCCs):
 - Concern about upcoming increase to DCCs
 - Question whether it might be possible to put off payment to Occupancy
 - Question whether DCC increase can be gradual
- Concerns about Step Code difficulties and expense

Time

- Concern about delays and about raising concerns and potentially increasing delays, especially with subdivision
- Question how long a development permit will take for 3-4 units
- Concern that more flexible guidelines may increase discussion time versus more rigid requirements