



# MUNICIPALITY OF NORTH COWICHAN DEVELOPMENT SERVICES FUNCTION REVIEW

## REPORT

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# TABLE OF CONTENTS

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<b>1. INTRODUCTION .....</b>	<b>1</b>
The Review .....	1
Objectives .....	2
Report .....	3
<b>2. CURRENT SITUATION.....</b>	<b>4</b>
Purpose of the Function .....	4
Legislative Framework .....	5
Development Services Function Staffing.....	10
Approval Processes .....	14
Technology.....	15
Information to Applicants.....	17
Planning and Development Statistics .....	18
Opportunities for Change .....	20
<b>3. PROCESS OPPORTUNITIES .....</b>	<b>22</b>
Process Mapping.....	22
Pre-Application Phase.....	23
File Intake and Assignment.....	25
Development Application Review Team .....	27
Referral Protocols .....	31
Housing First/Streaming .....	33
Delegation of Authority .....	35
Going Forward .....	36
<b>4. COMMUNICATION OPPORTUNITIES.....</b>	<b>39</b>
Application Forms, Guides and Checklists.....	39
Update Bylaws .....	41
Application Tracking.....	42
Target Timelines.....	45
Development Liaison Group .....	48
Going Forward .....	50
<b>5. TECHNOLOGY OPPORTUNITIES.....</b>	<b>52</b>
Going Forward .....	53

6. STRUCTURE AND RESOURCE OPPORTUNITIES .....56

    Organization Structure..... 56

    Staff Resources..... 61

    Going Forward ..... 61

7. IMPLEMENTATION .....64

    Lessons Learned..... 69

APPENDICES

APPENDIX I      Sample Process Charts

## CHAPTER 1 INTRODUCTION

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The Municipality of North Cowichan (MNC) has experienced steady population growth over the past decade, accompanied by an increase not only in development applications, but also in a transition in the proposed land uses, densities and buildings. In the past decade the municipality has approved new commercial centres, a hospital, an RCMP detachment, a high school, supportive housing, rental apartments, multiplexes, a daycare and other more complex buildings to support the growing community. Growth in population and increases in demand for development approvals are expected to continue in the coming years.

The MNC is responsible for creating the land use and servicing policy frameworks to guide development in the community. Within these frameworks, the MNC receives and processes development applications that are submitted by property owners (and proponents) who seek to develop the projects that are needed to accommodate growth. In processing development applications, the MNC must ensure that proposals support the municipality's policy goals and meet the various standards and requirements set out in the MNC's bylaws. The MNC must also ensure, however, that applications are processed in ways that are efficient and streamlined, and that provide certainty to applicants.

### THE REVIEW

To optimize efficiency and certainty in its processing of applications, the MNC decided to undertake a *Development Services Function Review*. The *Review* follows an initial phase of work, completed by MNC staff, that involved process mapping and discussions with each of the relevant departments, a SWOT analysis and identification of key friction points, as well as a preliminary software assessment. Building on this earlier work, the *Review* set out to examine and make recommendations on:

- the processes followed by staff in their reviews of development applications, including applications for official community plan (OCP) amendments, zoning amendments, development permits and development various permits, subdivision approval, building permits and others
- the types, numbers, and roles and responsibilities of staff in development planning and other divisions involved in processing applications
- the technology used by the MNC to facilitate and expedite processing
- the ways in which the MNC interacts with the development sector and other applicants
- ways to monitor and measure performance
- implementation framework
- other items that may emerge over the course of the review

Neilson Strategies Inc., a local government consultancy with considerable experience

in regulatory functions and municipal services, was hired to conduct the *Review* in collaboration with Leftside Partners Inc.

### Objectives

MNC staff created a project charter to detail the objectives of *Development Services Function Review* and the work undertaken to date by staff. The project charter acknowledged the challenges of the regulatory environment and the increased complexity of application reviews. It referenced some of the efforts already underway by the MNC, and lists several project objectives as follows:

- *Reduce Approval Times* — Expedite the processing times for development applications to better cater to housing and development needs, thereby addressing the housing supply crisis and associated costs.
- *Establish a Clear Business Process* — Formulate a standardized and transparent development approval process to ensure consistency and minimize confusion among planners and departments.
- *Enhance Accountability* — Integrate mechanisms to ensure accountability at every stage of the approval process, enabling clear tracking of responsibilities and progress.
- *Improve Coordination and Communication* — Promote better coordination and communication among internal departments and external agencies to streamline the referral process and ensure timely responses.
- *Optimize Resource Allocation* — Review and adjust application fees and resource allocation to ensure adequate staffing and support, thereby enhancing the capacity to manage the volume and complexity of applications.
- *Leverage Technology* — Implement advanced technological solutions to automate tracking, improve transparency, and facilitate a more efficient workflow.
- *Engage Stakeholders Early* — Improve early engagement with developers, the public, and other stakeholders to ensure comprehensive and high-quality applications, reducing the need for revisions and delays.
- *Identify and Implement Best Practices* — Evaluate current practices and adopt effective strategies from other municipalities or develop new solutions tailored to specific needs and contexts.

The *Review* reflects the MNC's commitment to identifying opportunities to improve, and represents a critical step towards fostering a more efficient, transparent, and predictable development environment in North Cowichan. To conduct the review, the consultants followed a seven-stage work program that included interviews with

staff in all relevant departments, a review of best practices in other communities, and one-on-one interviews with developers and development industry professionals.

### Report

The findings and recommendations from the *Development Function Review* are presented in this *Report*. The document begins with an outline of the current situation — specifically, the MNC’s development services function, which takes into consideration the property development regulatory framework in place and structure in the MNC’s Development Planning division, supporting guides and materials for applicants, development approval statistics, and other relevant points. Issues and opportunities with the current situation are then outlined over four chapters based on the work already undertaken by MNC staff, combined with the consultants' own assessment, discussions with staff, interviews with development customers (i.e., applicants) and their development professionals, and research on processes and best practices in other municipalities. Changes for the MNC to consider in order to capitalize on opportunities and help achieve the MNC’s objectives are outlined in these same chapters. Recommendations for the MNC to consider, and implementation framework are summarized at the end of the document.

## CHAPTER 2 CURRENT SITUATION

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This chapter profiles the Municipality of North Cowichan's broader development approval services function as it exists today. The function's purpose and regulatory framework are outlined first. Information on the MNC's Development Planning division and the broader Planning and Building Department, as well as the Engineering, and the Subdivision and Environmental Services Departments, is then presented, including information on staffing levels, structure, roles and responsibilities, development approval processes, development approval volumes, guides and resources for applicants, and other points.

Findings from research and recommended changes for the MNC to consider are presented in subsequent chapters.

### PURPOSE OF THE FUNCTION

Property owners in the MNC who seek to either develop or re-develop their properties must proceed in compliance with the requirements set out in the MNC's relevant policies and bylaws. Different development projects will require different types of approvals depending on the characteristics of the subject properties, and the proponents' development intentions. The most common types of approvals — more than one of which will almost certainly be required in each case — are as follows:

- an amendment to MNC's Bylaw No. 3900, *Official Community Plan (OCP) Bylaw (2022)* is required when a proposed development does not conform to the future land use designations set out in OCP
- an amendment to the MNC's Bylaw No. 2950, *Zoning Bylaw (1997)*, which must be obtained when the proposed land use is not permitted in the property's zone, or when the proposed density for the development exceeds that which is identified for the site
- a development permit, required for developments of certain types, such as commercial, industrial or multi-family residential, where form and character is a priority, or for properties situated within development permit areas with natural environment protection requirements or hazards such as steep slopes
- a development variance permit, required when an owner seeks to have relaxed the requirements in the *Zoning Bylaw*, *Subdivision Control Bylaw* or *Sign Bylaw* that are unrelated to the use or density of the property
- an application to the Agricultural Land Commission for subdivision to create new lot boundaries, or for a non-farm use or non-adhering residential use (NARU) on land within the Agricultural Land Reserve

- subdivision approval, to change or create new lot boundaries, including through the creation of new lots from existing lots, or through the consolidation of separate lots, in keeping with standards identified within the *Subdivision Control Bylaw*
- building permits, including associated building, plumbing and occupancy permits, which typically represent the end of the development process

Development Planning receives applications related to all these types of approvals (as well as certain others, such as temporary use permits). The division reviews the applications for alignment with the MNC's bylaws, policies and regulations. Building permits, which are required to construct or alter structures, represent an important step in the development process. These permits, as along with plumbing permits and sign permits, are subject to a separate regulatory framework and approval process within the Building division.

## LEGISLATIVE FRAMEWORK

### Provincial Legislation

The MNC obtains its authority to create development policies and regulations, and to require property owners to apply for and receive approvals pursuant to the policies and regulations, from the *Local Government Act*. Part 14, Planning and Land Use Management, sets out specific powers that the Municipality may or, in some cases, must exercise. The same part imposes constraints and requirements the Municipality must respect in the exercise of its powers.

The range of items addressed in Part 14 include:

- the authority of the municipality to adopt an OCP — defined in section 471(1) as a "statement of objectives and policies to guide decisions on planning and land use management" — along with requirements related to the contents of the plan and the procedures to create and adopt it
- the authority to create, and the procedures to adopt, a zoning bylaw that divides the municipality into zones, and that regulates for each zone:
  - the permitted land uses, buildings and structures
  - the allowable density for land uses and buildings
  - the siting, size and dimensions of uses and permitted buildings
  - the location of uses on the land and within buildings
- the authority to enter into housing agreements for affordable and special needs housing
- the authority to require applicants to provide traffic impact studies, environmental reports, infrastructure impact reports and other development approval information requirements in support of applications to amend the

*Municipality of North Cowichan Zoning Bylaw*, or for a development permit or temporary use permit

- the authority to create development permit areas in the OCP, and to require property owners within each designated area to obtain one or more development permit prior to subdivision, construction or alteration of a building, or any alteration of land within key types of development permit areas, including those dealing with the natural environment and greenhouse gas reductions
- the authority to create and impose specific protections, conditions and requirements in different types of permit areas
- the authority to issue temporary use permits within designated areas to allow for a specified period of time a use not permitted in the *Zoning Bylaw*, and to specify conditions under which the use may occur
- the authority to issue development variance permits to vary specific provisions — other than density, use or residential tenure — of the *Zoning Bylaw*, service requirements from the MNC's *Subdivision Control Bylaw*, or requirements in MNC's *Sign Bylaw*
- application fees that the municipality may, by bylaw, impose on all applications to amend the OCP, change zoning, obtain a development permit or development variance permit, and obtain certain other types of approvals (e.g., subdivision, building permits)
- the authority to recover development-related costs through development cost charges and amenity cost charges, along with limitations on how those charges can be calculated and the resulting funds used
- the requirement to prepare housing needs reports, and the content of those reports

Part 14 of the *Local Government Act* is the primary source of authority and direction for municipalities in the development services function. Secondary sources include provincial statutes and regulations related to highways, protection of the natural environment, registration of lands, registration and operation of strata corporations, and the regulation of agriculture and farming.

The legislative framework for building permit portion of development services relies on a different set of provincial statutes and codes. The key pieces of legislation are identified as follows:

- *Building Act* — The *Building Act* is the provincial statute that regulates

building and construction across the province.<sup>1</sup> The *Act* identifies the province as the sole authority to set the technical requirements for the construction, alteration, repair and demolition of buildings. The *Act* also sets out the qualifications required for persons who wish to serve as Building Officials. Building Officials are the municipal staff members — also referred to as Plan Checkers and Inspectors in North Cowichan — who hold the qualifications necessary to review building plans and monitor construction for compliance to technical building requirements. Building Officials under the *Act* may be qualified to Level I, Level II, or Level III. Each successive level requires a higher degree of expertise, and allows an official to review and monitor increasingly complex buildings.

- *British Columbia Building Code* — The *BC Building Code* is the provincial building regulation created pursuant to the *Building Act*. The *Code* sets out the technical requirements that apply to the construction of all types of new buildings in BC, including residential, commercial, institutional, and industrial buildings. *Code* requirements apply, as well, to alterations and additions made to existing buildings, and to proposed changes in the use of buildings.

The requirements in the *Building Code* address concerns related to health, safety, and fire and structural protection. Needs and goals related to accessibility, as well as energy and water efficiency, are also addressed through the *Code's* requirements. Builders comply with the *Building Code* by following the requirements as prescribed in the *Code*, or by proposing an "alternative solution" to achieve the same outcome. Local governments decide whether to approve proposed alternative solutions.

- *British Columbia Plumbing Code* — The *BC Plumbing Code* sets out technical requirements related to the design and installation of new plumbing systems, and to the extension, alteration, renewal, and repair of existing systems. The requirements are designed to protect health, but also to prevent water and sewer system damage.<sup>2</sup>
- *British Columbia Fire Code* — The *Fire Code* sets out the minimum building design, construction, and use requirements designed to address fire safety needs, and to protect persons in new and existing buildings from fire hazards. The *Fire Code* is developed by the province's Building Safety Standards Branch, which is the same agency responsible for developing and updating the other codes. The *Fire Code*, however, is issued as a regulation under the *Fire Services Act*.

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<sup>1</sup> The *Act* applies in all parts of BC with the exception of the City of Vancouver, federal lands, and reserves.

<sup>2</sup> The Plumbing Code forms one part of the Building Code, but is typically presented as a separate stand-alone document.

- *Community Charter* — The *Community Charter* is the provincial statute that provides authority to, and governs the activities of, municipalities in British Columbia. Section 8(3)(l) of the *Community Charter* gives municipal councils in British Columbia the specific authority, exercised by bylaw, to regulate, prohibit, and impose requirements in relation to buildings and structures.

Over the past two years, the provincial government has announced significant policy initiatives aimed at addressing housing supply and affordability concerns across British Columbia, including in MNC. Taken together, the initiatives require MNC to:

- increase the density permitted in single-family residential lots
- increase density, in the form of multi-family housing, within 400 metres of transit-oriented development areas
- remove municipal requirements for minimum numbers of general off-street parking spaces in transit-oriented development areas
- eliminate public hearings on rezoning applications in cases where the proposed zoning amendments are consistent with the official community plan and contain residential uses
- update official community plans every five years with public input
- require official community plans to account for projected growth over a minimum of 20 years
- update mandatory housing needs reports to account for future growth, including the types of housing required to accommodate growth

These policy initiatives were introduced and passed in two bills in late 2023<sup>3</sup>: *Bill 44, Housing Statutes (Residential Development) Amendment Act, 2023* and *Bill 47, Housing Statutes (Transit-Oriented Areas) Amendment Act, 2023*. Affected municipalities, including the Municipality of North Cowichan, were required to put in place the local regulatory changes needed to meet the provincial requirements.

The Province of BC also issued a separate housing target order that identified specific housing targets for the Municipality of North Cowichan (as well as other municipalities) under the *Housing Supply Act*. The housing target order, which came into effect on August 1, 2024, set out the total five-year housing target to be met by July 31, 2029, requiring North Cowichan to facilitate the construction of 1,233 new housing units, with a target of 191 in the first year. At the 6-month interim report (August 1, 2024 – January 31, 2025) MNC reported that 83 of 191 units had been completed.

### **Municipality of North Cowichan Bylaws**

The *Local Government Act* provides the MNC the authority required to create and enforce development policies and regulations to govern development in the municipality. The actual policies and regulations, however, are outlined in the MNC's

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<sup>3</sup> The Bills were introduced and Royal Assent given in November 2023.

bylaws that property owners must follow to obtain the necessary development approvals. Key MNC bylaws include:

- *Development Application Procedures Bylaw No. 3924, 2025* — This bylaw sets out the requirements that must be met, and the procedures that must be followed, by property owners who submit a variety of applications to the MNC, including amendments to the OCP and *Zoning Bylaw*, development permits, development permits with variances, development variance permits, minor development variance permits, temporary use permits and ALC applications.
- *Fees and Charges Bylaw No. 3784, 2020* — Schedule C of this bylaw identifies the fees that must be paid to the Municipality as part of development applications referenced in the *Procedures Bylaw*, including for the processing of applications to amend the OCP or *Zoning Bylaw*, obtaining a development permit or development variance permit, submitting an ALC application, as well as for subdivisions, inspections, building permits, sewer and water fees and other development-related items.
- *Official Community Plan Bylaw No. 3900, 2022* — adopted on August 17, 2022, the OCP is the Municipality’s principal strategic planning document. Policy directions are organized around seven goals for the future of MNC. Individual policies direct decision-making and actions required to achieve the desired future. The OCP endorses a “focused growth” approach and incorporates an urban containment boundary within which are growth centres. Growth management policies, land use designations, development permit areas, and other sections in the OCP guide property development.
- *Zoning Bylaw No. 2950, 1997* — The *Zoning Bylaw* divides the Municipality into geographic zones, identifies the specific land uses permitted in each zone, and sets out regulations related to density, lot size and coverage, building height, yard setbacks, parking requirements, and other matters. The *Zoning Bylaw* also includes requirements for off-street parking.
- *Subdivision Control Bylaw No. 1851, 1980* — The bylaw sets out the application process for subdivision and building permits, as well as the standards and design criteria for the on-site and off-site works and services that must be provided by property owners as a condition of subdivision approval<sup>4</sup> or building permit issuance.
- *Building Bylaw No. 3172, 2003* — The bylaw sets out regulations for construction of new buildings in the municipality, including design, construction, and occupancy, and existing buildings and structures’ alteration,

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<sup>4</sup> Works and services include on-site and off-site roads, drainage, community water and sewer systems, sidewalks, street lighting and other infrastructure items.

demolition, reconstruction, relocation, removal, and occupancy, and establishes the requirement and application process for permits, and for buildings to comply with the Bylaw, Building Code, and other applicable codes, standards, and enactments.

- *Sign Bylaw No. 3479, 2012* — The bylaw sets out the regulations for erecting signs, including the process for obtaining a sign permit.

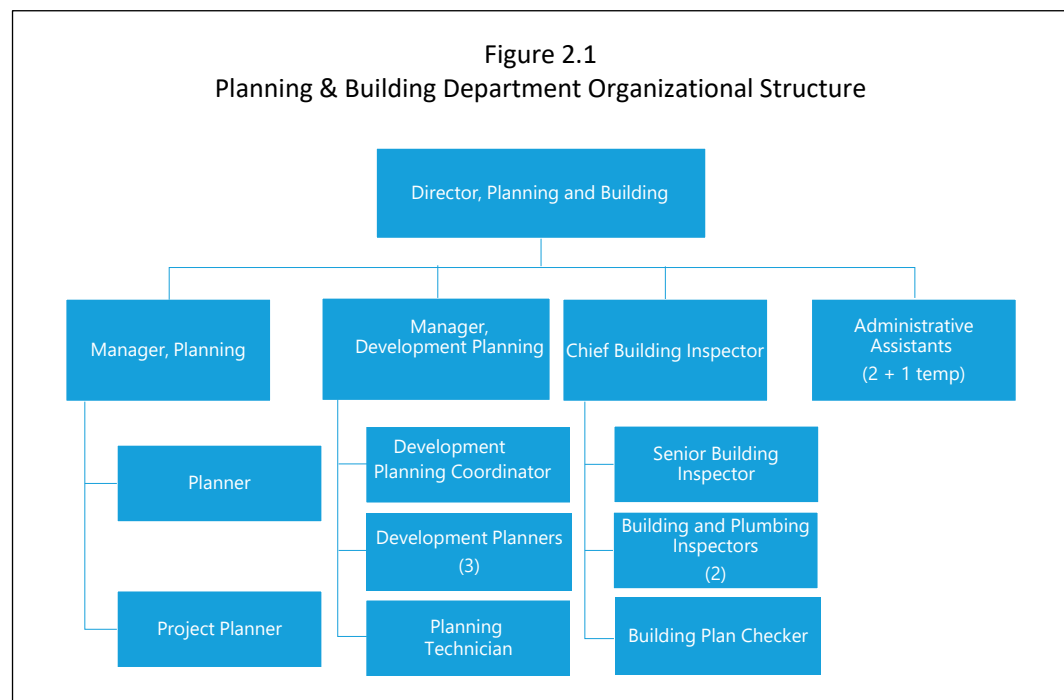
## DEVELOPMENT SERVICES FUNCTION STAFFING

### Development Planning

Staff in different divisions within the MNC organization are involved in reviewing and approving applications for development. The bulk of staff assigned to development approvals are within the Development Planning division of the Planning and Building Department.

Figure 2.1 identifies the four divisions within the broader Planning and Building Department, and the positions within each division, including:

- *Director of Planning and Building* — The Director reports to the MNC's General Manager, who is responsible for overseeing Engineering, Parks and Recreation, Planning and Building and Public Works and Operations. The Director has delegated authority for issuing development permits and several other approvals (e.g., temporary use permits, strata conversions), and oversees the Development Planning division, as well as the Building, Community Planning and Administration divisions. The Director is also



involved in developing policy and regulatory initiatives, liaising with other departments and the development community, and undertaking a variety of related tasks.

- *Manager of Development Planning* — This position is responsible for managing the daily operation of the MNC’s Development Planning function, including overseeing and directly reviewing complex development applications, and providing leadership to and management over the work of the division’s Planning Coordinator, Planners and Planning Technician. The position assists with administration of the Department and providing support and coverage for the Director and other staff.
- *Development Planning Coordinator* — This position was traditionally responsible for the overall coordination of all planning applications. Coordination remains an important aspect of the division; however, equally important is the position’s role in reviewing complex application files. The re-framing of the position to include file review occurred during the consultants’ assignment, in part based on discussions with North Cowichan management. Other responsibilities include supervision planning and administrative staff work, and the provision of professional planning advice.
- *Planners* — There are three (3) Planner positions in the Development Planning division. Planner positions are the first line of problem solving. They are responsible for reviewing all types of development applications, including OCP amendments, rezonings, development permits, development variance permits, ALC applications and others.<sup>5</sup>
- *Planning Technician* — There is one (1) Planning Technician that assists the division in processing development applications and responding to inquiries at the counter, by telephone and by email. The technician handles the majority of general inquiries, and pre-application meetings, building permit compliance reviews, and helps with the intake process. The position also assists on minor applications.
- *Administration* — Development Planning is supported by the Department’s Administration division, which in 2024 included two assistants and one temporary assistant. A full-time administrative assistant for building services was approved in the 2025 financial plan in January, making the casual staff and temporary administrative assistance a permanent position.

In MNC responsibility for engineering-related work is separated into two separate departments — the Subdivision and Environmental Services Department, and the

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<sup>5</sup> None of the positions is formally specialized by type of development or region of the municipality. Application files are assigned to individuals in the positions based largely on experience and workload.

Engineering Department. While several other departments provide input to and comments on development applications, these two departments play an integral role in the review and approval of development applications.

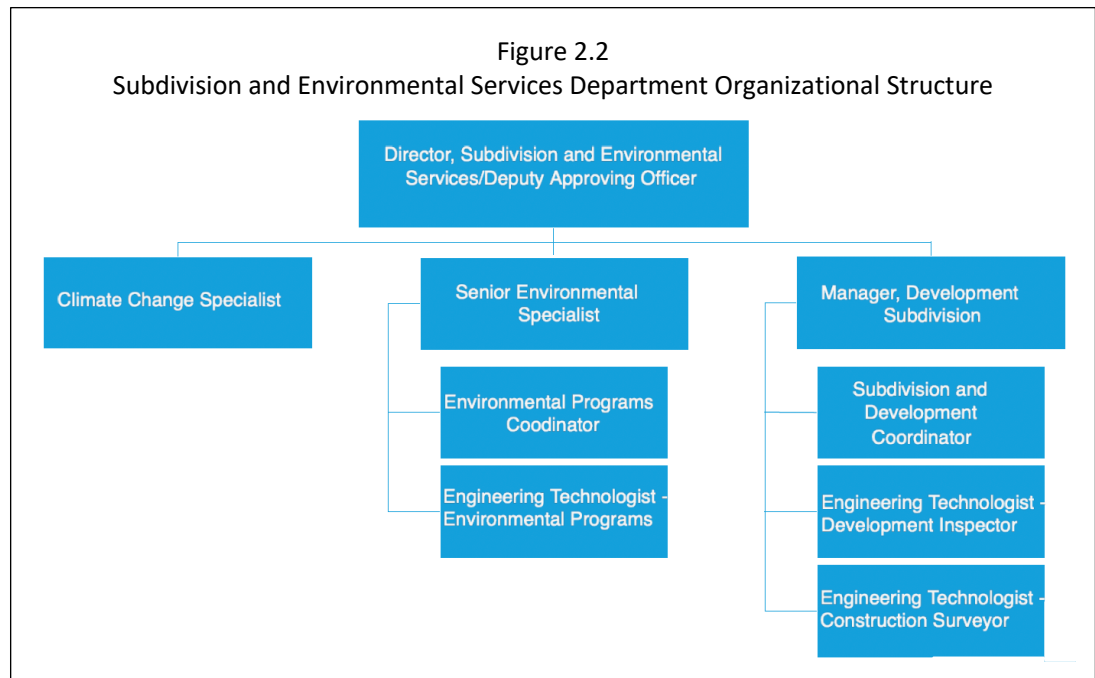
**Subdivision and Environmental Services**

Subdivision applications are processed and approved by the Subdivision division; works and services that support development are secured by the same group. The division reviews civil works design drawings and submitted designs for local infrastructure, including pipes, roads and on-site drainage works. The division also oversees and inspects municipal infrastructure constructed by developers (water, sanitary sewer, drainage, local roads). The reviews of applications for municipal services and associated permits are considered in cooperation with Engineering. Designs are referred to Engineering in cases where large municipal infrastructure is affected, such as trunk mains, pump stations, reservoirs, collector and arterial roads.

The Environmental Services division assists in the review and approval of development applications, in particular the Natural Environment Development Permits. Figure 2.2 on the following page shows the organizational structure of the full Subdivision and Environmental Services Department, including the position of Director, and the positions of the eight (8) staff in the Climate Action, Subdivision and Environmental divisions.

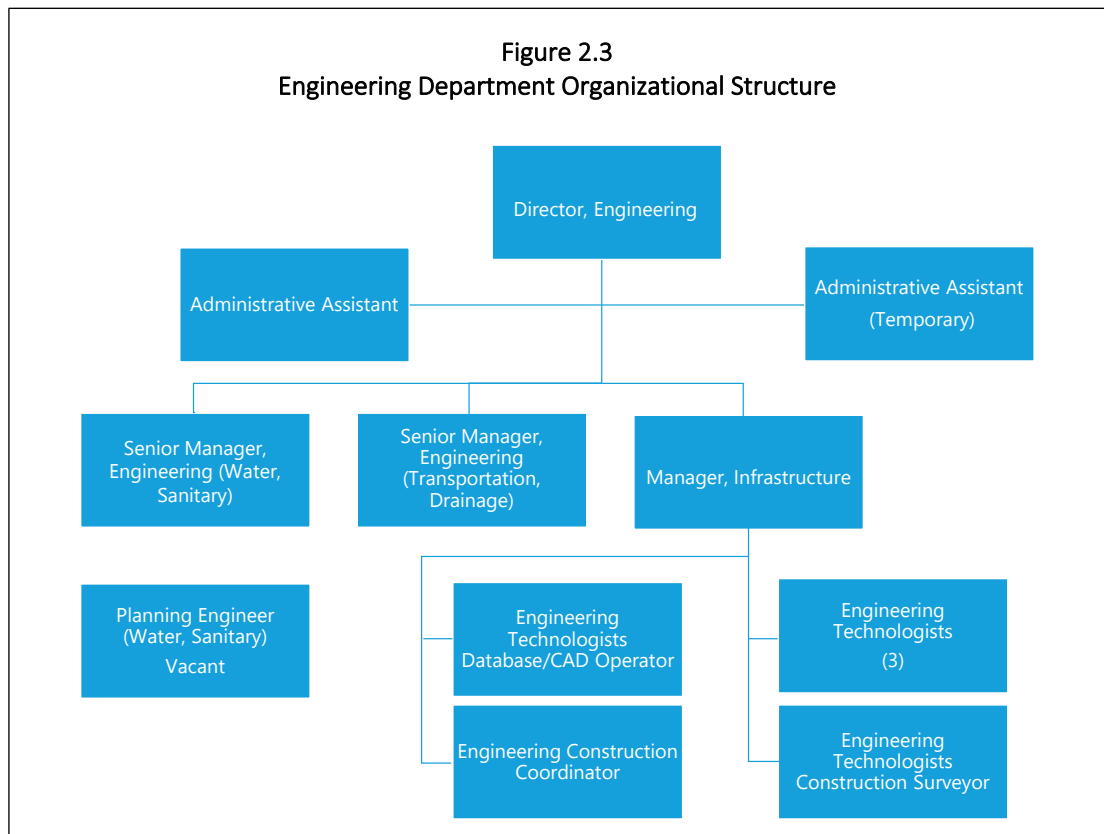
**Engineering**

The Engineering department provides technical expertise to other departments on municipal services and projects, reviews land development projects, designs and oversees the construction of capital projects, implements asset management, and



assists in the creation and management of the MNC 5-year capital plan. The department’s business plan lists development engineering as one of its four core functions, together with asset management, capital projects and permitting. The structure of the department (shown in Figure 2.3) does not distinguish between infrastructure planning/asset management and delivery of capital projects, which sets North Cowichan apart from many other municipalities. In January a full-time administrative assistant position was approved, providing some permanency to the role shown in Figure 2.3 as temporary. The department also received Council approval for a planning engineer (transportation/drainage) as part of the 2025 budget process.

In recent months the Engineering Department has created long range infrastructure capacity models to take into account potential future development levels related to OCP updates, existing development applications and the provisions of the *Housing Statutes (Residential Development) Amendment Act (Bill 44)*. The department has identified several capacity limitations, and is in the process of determining capital project priorities to address the limitations. The approach to allocating the existing, limited infrastructure capacity, and to financing and phasing of capital projects, will impact the MNC’s ability to approve development applications. Put simply, the Municipality will not be able to approve some development proposals that come forward for consideration.



### Infrastructure Constraints

In early 2025 North Cowichan completed its water and sanitary infrastructure modelling to assess the capacity of the Municipality's existing sewer and water systems. The modeling was required to understand fully the limitations of the MNC's infrastructure to accommodate development anticipated by current applications, along with the development that could occur under the provisions of the OCP and the *Housing Statutes (Development) Amendment Act, 2023 (Bill 44)*.

In March the Engineering Department presented the results to Council. The modelling indicated that there is sufficient capacity to service the 4,200 residential units identified under existing building permits, subdivision approvals, development permit applications and land development agreements. The existing capacity in the water and sewer systems is earmarked for these developments on the assumption that they will proceed and connect. Capacity to support an additional 5,900 residential units, proposed under OCP amendment and rezoning applications, does not exist.

The Engineering Department estimates that upgrades to create additional capacity exceed \$350 million. The Municipality intends to seek funding from other orders of government where available. Updated DCCs are planned to raise funds for growth-related infrastructure upgrades; developer-funded infrastructure options will also be explored.

North Cowichan is working to manage risk to the Municipality going forward, and to make owners and applicants aware of the constraints and need for additional infrastructure investments before projects are advanced. The Municipality is also working to reallocate existing capacity in cases where development approvals that have been granted expire.

Efforts to address the infrastructure capacity challenges are priority for North Cowichan. The Municipality understands that improvements to the development services function, while important, will be of limited value if new applications for development cannot be accepted for review.

### Other Divisions and Departments

Development applications received by the Development Planning division are referred to staff in other divisions of the Planning and Development department (Building and Community Planning), as well as representatives from different divisions in Parks and Recreation, the Fire Rescue Service, and occasionally other departments as required (e.g., Operations). Staff from these internal groups review and provide comments as input on the applications.

### APPROVAL PROCESSES

The MNC, similar to every local government, creates and follows processes to receive, review and approve development applications. The specific processes to be followed in any particular situation are shaped by the proposed development type,

the characteristics of the parcel, and the number of approvals required. Proposed developments that require a change in zoning, for example, will follow the MNC’s rezoning process. In many cases, such projects will also require a development permit and, in some instances, subdivision approval, both of which are granted through their own separate processes which overlap with the rezoning process.

Figure 2.4 presents an overview of the MNC’s rezoning process. Details in the figure give a sense of how applications are considered by the MNC, as well as an understanding of the roles and responsibilities of staff, Council and applicants. As illustrated, the process consists of four phases: Pre-Application Phase, Application Phase, Review Phase and Approval Phase. In accordance with the province’s *Housing Statutes (Residential Development) Amendment Act (Bill 44)*, public hearings are only used for projects that do not comply with MNC’s OCP.

The MNC recently approved changes to the municipality’s Development Procedures Bylaw that enabled delegation of decision-making to staff for minor variance permits in an effort to help streamline the approvals process, reduce wait times for applicants, and allow Council to focus on higher-level priorities. The staff report to Council noted that the change offers advantages such as increased efficiency, a simplified experience for applicants, and more strategic use of Council’s time. The change also, however, reduces “Council’s direct involvement in specific decisions and places greater responsibility on staff to decide potentially subjective or contentious requests that may not necessarily be subject to clear policy direction.”<sup>6</sup> It was also noted that the change was initiated prior to the conclusion of and recommendations from the Development Services Function Review, and that there would be subsequent opportunity for Council to consider further amendments to the bylaws.

### TECHNOLOGY

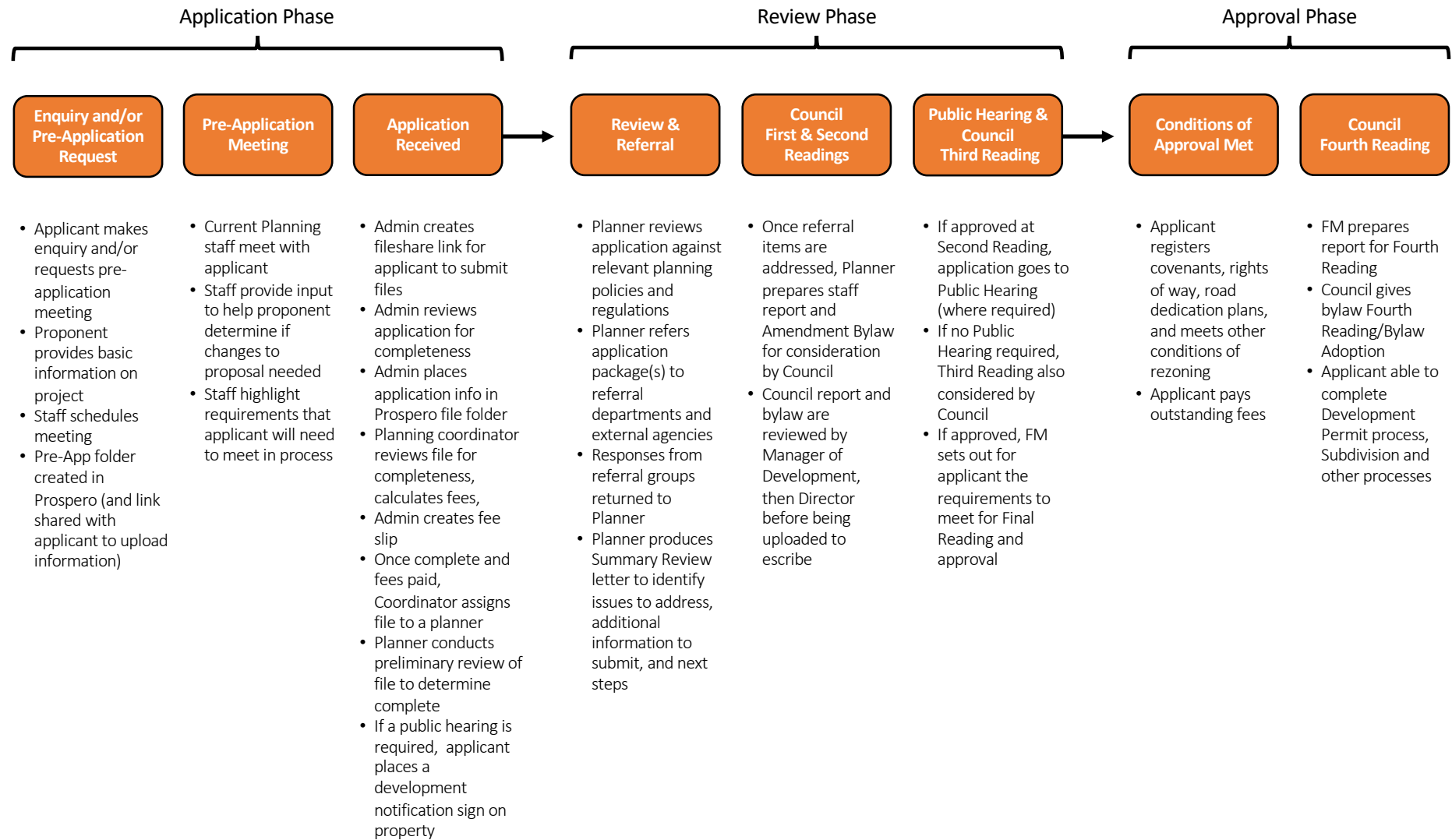
The Development Planning division uses the Tempest platform with Prospero module, which is owned outright by MNC. The platform is not consistently used by all MNC departments and is no longer being updated. Other applications or platforms used include Laserfiche, Vadim, and ArcGIS Pro.

The MNC provides development application information online through the “Building North Cowichan” tool, which is an add-on to the Tempest platform that allows residents to search for active development applications (OCP, Rezoning, Development Permits, Development Variance Permits, Temporary Use Permits and ALC applications), to review base information regarding the tasks, or milestones required for the project (and which ones are completed), as well as documents such as site plans or application information for those who wish to view plans. The tool does not provide access to archived projects.

The MNC also has MyMuni, which is an add-on to the Tempest platform that provides access to its searchable building permit database online, including the ability to

<sup>6</sup> Staff Report to Council, SPP00107, prepared by Patricia Taylor, February 5, 2025, p. 4

Figure 2.4  
Current Rezoning Process



search for building permit applications, issued building permits and completed building permits by entering a date range for the search. MyMuni also enables residents to view their own business licences, property tax balances, utility bills and usage, register for recreation programs and pay for certain services online. MyMuni is owned outright by MNC.

The MNC's Interactive Web Map allows residents to view planning, engineering, and property information, including zoning, development permit areas, utilities as well as service areas such as garbage collection, and make and print their own maps.

The municipality also uses an engagement platform, Social Pinpoint, to provide *Connect North Cowichan* and to engage with residents about specific projects. The MNC shares information about a variety of municipal projects, including housing policies, to create awareness and seek public input.

### INFORMATION TO APPLICANTS

For both staff and applicants, the processes through which development applications are reviewed and approved can be complex, with staff from various divisions and external agencies involved, multiple submission requirements for applicants, and several conditions to be met for approval. Over time, with new policy and regulations at the municipal, regional and provincial levels, the degree of complexity has increased. It is incumbent upon municipalities to provide user-friendly resources and guides to assist development customers in understanding what is expected of them, and in navigating the approval processes.

The Municipality of North Cowichan has some materials available for downloading on the Development Planning and Building Permit pages at the Municipality's website to guide development customers and potential applicants. Items include:

- relevant Municipality bylaws, including *Official Community Plan, Zoning Bylaw, Development Application Procedures Bylaw* and other planning and building related bylaws
- fillable application form for the various approvals and permits
- a set of guides with information to help applicants navigate different application types, but also guide to obtaining supporting professional reports
  - A Guide to Development Permits (PDF)
  - A Guide to Development Variance Permits (PDF)
  - A Guide to Temporary Use Permits (PDF)
  - A Guide to Official Community Plan Amendments (PDF)
  - A Guide to Zoning Amendments (PDF)
  - A Guide to Preparation of Geotechnical Reports (PDF)
  - Landscape Policy (PDF)
- guidance for submitting an online application (or how to submit if you are not using the online process)

- a link to the MNC Interactive Web map referenced previously with layers that identify development permit areas, zoning, and servicing, as well as property information
- a link to the *Building North Cowichan* tool to view current development applications (does not include subdivisions or archived projects)
- instructions for requesting a file review letter

The Building webpage provides links for different types of common projects that require building permits, with more detailed information on the process and required documents for each type of building (such as single-family dwellings, secondary suites, accessory dwelling units, detached garages, renovations, decks, demolitions, plumbing, retaining walls and signs) including more complex multi-family and industrial buildings. Other links assist applicants with:

- application documents
- permit fee information
- how to book an inspection
- information on common building-related documents and requirements, such as notices on title, establishing occupant load, driveway permits and others
- the “Building Industry” MNC newsletter (note the last issue was in 2020)
- reaching other agencies, such as the archaeological branch, Agricultural Land Commission, New Home Registry
- building permit checklists, guides, and sample plans including site plans and house plans

### PLANNING AND BUILDING STATISTICS

The Municipality’s volume of new development has continued at a steady pace over the past five years. The total number of planning applications was higher in 2024 than in the past few years, with a higher number of rezoning applications than in any other year in the past five years. There were fewer subdivision applications submitted in 2024 compared to 2023, and fewer lots created; however, more units were built since the majority of units were multi-family. By the end of September 2024, 489 residential units had been built and approved through the Building division in 2024. Figures for development applications, subdivisions and building permits are shown in Figures 2.5, 2.6 and 2.7 on the following page.

In viewing the figures, it is important to consider certain limitations inherent in the data. It is important to note, for example, that Figure 2.5 shows how many individual development applications were received by the MNC each year, but not how many were approved or actively being processed, nor the varying level of complexity associated with the different files. It is important, as well, to note that efforts to process files in one year often extend into subsequent years. The impact on staff resources may be greater than that which is implied by focusing on totals received in single years. The subdivision application statistics (Figure 2.6) are now recording applications received separately from the number of applications that were active during the year, to provide a better indication of workload.

Figure 2.5

Planning Applications Received in 2020 – 2024, plus 2025 (1<sup>st</sup> Quarter) by Type

APPLICATION TYPE	2020	2021	2022	2023	2024	2025
Agricultural Land Commission	3	3	5	5	4	1
Board of Variance	0	3	3	0	5	0
Development Permits	29	28	24	14	16	4
Development Permits with Variance	0	8	5	7	10	1
Development Variance Permits	9	9	7	8	7	0
Mobile Home Park Permits	0	0	0	1	0	0
Temporary Trailer Permits	2	5	1	0	0	0
Temporary Use Permits	1	1	1	4	3	0
Telecom Antenna Structures	0	0	1	1	3	0
Official Community Plan Amendments	2	1	3	2	1	2
Zoning Bylaw Amendments	13	15	14	11	23	6
<b>TOTALS</b>	<b>59</b>	<b>73</b>	<b>64</b>	<b>53</b>	<b>72</b>	<b>14</b>

Figure 2.6

Subdivision Statistics

	2018	2019	2020	2021	2022	2023	2024
<b>LAND DEVELOPMENT</b>							
# of active subdivision applications in process <sup>[1]</sup>	21	26	23	50	64	48	36
# of subdivision applications submitted						21	8
# of lots created by subdivision <sup>3</sup>	20	169 <sup>[2]</sup>	125 <sup>[2]</sup>	43	53	71	25
Single family	149	132	154	180	116	33	22
Multi-family	186 <sup>4</sup>	174 <sup>4</sup>	39 <sup>4</sup>	69 <sup>4</sup>	465 <sup>4</sup>	38 <sup>4</sup>	3
<b>Notes</b>							
[1] Represents number of applications being managed in the year stated. This includes applications that are with a developer, that have a Preliminary Layout Approval issued, that are on hold waiting for information from a developer, or that are in for final approval (with staff).							
[2] The higher number is due to the registration of a large number of lots from a single large land development project (Kingsview) in 2019 and 2020 (approximately 70 lots).							
[3] Includes new one and two family lots plus lots created for higher density development (counted as 1)							
[4] estimated total number of units							

Processing Times

While the MNC shares information on most development applications (except subdivisions) that are instream through *Building North Cowichan*, including some of the key milestone tasks, the MNC does not currently publicly track or publish the time it takes to process different types of development applications. The MNC provides an indication of the range of processing time within the individual application guides, as follows:

- Development Variance Permit – 3 to 5 months
- Development Permit – 2 to 4 months

**Figure 2.7**  
**Building Statistics**

Year	Building Permits	Commercial	Residential	Other	Residential Units Created	Total Value of Construction
2017	294	36	198	60	162	\$47M
2018	336	30	194	112	378	\$67M
2019	263	20	171	70	340	\$85.8M
2020	301	29	202	70	221	\$64.2M
2021	329	15	232	82	291	\$116.9M
2022	251	17	156	78	492	\$161.4M
2023	245	20	123	102	303	\$309.7M
2024*	192	24	43	125	489	\$102.6M

\* to September 30, 2024

- Rezoning – 6 to 12 months
- OCP Amendment – 6 to 12 months
- Temporary Use Permits – 3 to 6 months

Processing times constitute an important metric that matters considerably to the development community and Council, and to staff involved in the process. They are also a metric that can be defined and calculated differently across municipalities, and that must be examined carefully if used to compare between two different jurisdictions. A municipality that "starts the clock" at the time of application acceptance and keeps it running until final approval, for example, is timing a process that relies on the efforts and responsiveness of staff and applicants. By contrast, a municipality that "stops the clock" for the periods of time during which the applicant is responding to the municipality's requests for information focuses on time taken by staff. Some municipalities track timelines associated with reaching different milestones, such as completion of initial review. The desire to establish target processing times and measure timelines is discussed in Chapter 4.

#### OPPORTUNITIES FOR CHANGE

Over the course of the assignment, the consultants interviewed MNC staff from the Development Planning division, along with key staff from other divisions involved in development approvals. Interviews with 11 developers and development professionals were conducted. The consultants reviewed a range of materials from the Municipality and undertook comparative research on similar-sized growing municipalities in British Columbia and elsewhere to explore different approaches and ideas that may be of value to MNC.

Based on the findings from the interviews, review of materials and comparative research, the consultants identified a set of opportunities for the Municipality to consider. The opportunities can be grouped into four main categories, including:

- processes
- communication
- technology
- structure and resources

Each of these themes are explored in the subsequent chapters, including specific opportunities identified by separate headings, including examples of other municipal practices, and recommended actions. The actions to take advantage of the opportunities are summarized at the end of each chapter, including the benefits of the actions. The actions are also reiterated as recommendations within the report's final chapter, together with implementation priorities and timing. Of the items identified, the opportunities examined are those deemed by the consultants to be the most important for the MNC to address.

## CHAPTER 3 PROCESS OPPORTUNITIES

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### PROCESS MAPPING

One of the foundational elements needed to facilitate development approvals at MNC is a standardized and documented approval process for each application to follow. Having clear, documented and well-defined processes will help the MNC:

- communicate with applicants
- establish consistency in the review process
- on-board new staff
- minimize duplication and delays
- set expectations of staff
- promote collaboration among key departments
- establish timelines for key milestones
- promote accountability
- measure performance
- determine how recently highlighted servicing capacity and allocation considerations fit into the process

The consultants heard from many staff members about the lack of guidance on how different application types should proceed, and on the lack of any framework to guide approvals. Staff members and file managers are knowledgeable about reviews that must be undertaken to advance applications; however, there is currently no agreed-upon framework that can serve as a consistent map for both applicants and staff.

It is important that the processes be mapped collaboratively with affected departments so there is a common understanding of the objectives, support for the process, and understanding of the individual roles and how they work together to achieve the common goal. There is no one best process; there are, however, some best practice elements to incorporate into processes. Such elements include:

- a formalized pre-application phase that helps to prepare, and provide key information to, applicants prior to applications being submitted, to ensure that applications are feasible and are accompanied by necessary supporting information and materials at time of submission
- a streamlined intake process with steps to ensure that applications are complete, fees are paid, file details and tracking information are consistently entered, file managers are assigned, and confirmation is sent to applicants
- the creation and use of a multi-departmental development application review team, with clearly defined roles for participants, to bring reviewers from different departments together, and to expedite resolution of internal

concerns and/or conflicting expectations and regulations

- a streamlined referral process that makes use of inter-departmental protocol agreements to minimize the number of applications that need to be referred to individual departments, and to outline expectations of each department's involvement

In the current environment, in which servicing capacity constraints are forcing decisions to be made on the allocation of servicing capacity, having clear established processes to guide staff and applicants will enhance consistency and transparency.

### PRE-APPLICATION PHASE

The MNC currently offers pre-application meetings as a recommended but voluntary procedure to help applicants understand the application process, to determine what information is needed, and to seek information and feedback about an initial proposal. In the time since the *Development Services Function Review* was initiated, but in advance of this report, staff began to implement a more prescriptive pre-application process to proactively address some issues that may impact application processing. As part of that process, an initial summary review is now provided to a proponent on their proposal, with a pre-application meeting scheduled if warranted or requested.

Most municipalities encourage development proponents to schedule pre-application meetings with local government staff to review development intentions and preliminary plans. A recent trend has seen many municipalities establish a more formal and robust pre-application phase as a requirement in the development approval process to ensure applicants receive municipal feedback and are well-prepared for the application process ahead. Several cities, such as the City of Nanaimo, have mandatory pre-application meetings for development proposals that require rezoning or development permits. In some municipalities, such as the City and the District of North Vancouver, the pre-application process is the first of a two-stage process — pre-application and application — with a comprehensive internal review occurring in the pre-application phase. Formal pre-application reviews require materials to be submitted in advance by applicants for review by staff from planning and development engineering (and at times other departments) prior to the meeting. Feedback shared during the meeting is documented and provided to applicants after the meeting to guide any subsequent applications.<sup>7</sup>

Pre-application meetings are no longer considered simply as a way to identify incomplete applications. They are increasingly viewed as an important opportunity

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<sup>7</sup> The City of North Vancouver describes planning applications as a two-step process, with the average pre-application stage processing time estimated to take 3 to 4 months. While the pre-application timeline appears lengthy, the emphasis on and resourcing of the pre-application stage reflects the importance of the initial phase in the speed and success of the application.

to proactively address issues that have the ability to impact processing timelines. The meetings are used to:

- ensure applicants understand the process
- set expectations for applicants to meet
- ensure applicants understand the scope and quality of materials needed to support applications, how and when in the process to obtain them (if necessary), and what to expect in terms of time and cost to obtain the relevant studies
- review the feasibility of the proposed developments in the context of the MNC regulations, and highlight issues that need resolution
- discuss any servicing capacity constraints and MNC policies to address them
- discuss application fees as well as any related engineering, building permit, amenity cost charges and development cost charges that will impact the project
- discuss timelines
- share templates and terms of reference for the necessary supporting studies
- provide a checklist of items that will be required if a subsequent application is made

The meetings must be staffed, at a minimum, by a planner and an engineering technologist. Where the scope of the application meets thresholds to involve additional departments or requires the expertise of specialized staff (such as environmental specialists) or utility representatives, attendance at the meeting and/or feedback is coordinated to help ensure a high-quality application that meets or exceeds the municipality's standards.

A formal pre-application phase will be particularly valuable as the municipality receives more complex applications and works to address its servicing capacity challenges. Pre-application meetings also provide personalized guidance that benefits less experienced developers who may require more assistance in understanding and navigating the approval process.

The City of Surrey recently introduced a robust pre-application pilot process based on its analysis of the positive impact the enhanced pre-application could have on processing timelines. A report to Council noted that:

"...the impact of deficiencies on applications cannot be overstated. This problem has led to added pressures on staff to perform multiple reviews on the same applications which, in turn, limits staff's ability to commence reviews on new applications, thereby delaying the overall application review process for multiple applications in the queue. The cumulative impact includes delayed development approvals and permit issuances, not only for

the projects containing deficiencies but for all applications, and a general slowing down of the process for all customers.”<sup>8</sup>

Several municipalities require pre-application meetings only for specific types of applications, such as OCP amendments, rezoning and development permits. Where applications are more routine, such as a natural environmental or hazard land development permits with no variances, a submission review meeting could be required as an alternative to a more robust pre-application meeting to review the submission with the applicant to confirm it is complete. Applicants who are unfamiliar with the application process, however, should be encouraged to use the pre-application meeting to receive guidance regardless of the application type.

### FILE INTAKE AND ASSIGNMENT

The intake role in most municipalities involves administrative staff who are responsible for confirming that the submission requirements are fulfilled, and information provided. The focus of intake is the completeness of the application; intake staff do not typically vet the quality of the application or the supporting materials. The intake process also involves creating the files, populating them with the application information to enable consistent tracking and reporting, and communicating with the applicant.

At MNC, after the pre-application phase of the process, applicants email the planning department to request an access link to the MNC file sharing site to submit their application. The application and the “online submission application guide” identify a list of items to be provided at the time of submission. The applications are received and reviewed for completeness by planning administrative staff; the files are created and forwarded to the Development Coordinator. The Development Coordinator is tasked with conducting an initial review of the file contents to ensure application completeness before assigning the file to a File Manager for full review.

The acceptance and assignment of applications are important pre-review functions that, when working well, can expedite the overall review timeline. Conversely, problems at these pre-review steps can result in frustration and delay as well as considerable backlog. Applicants in the MNC have raised concerns with the time lag in North Cowichan between submission, fee payment and confirmation of assignment to a File Manager. Staff highlighted, in MNC’s internal SWOT analysis, both the application intake process and the subsequent delay in assigning File Managers as two key friction points. A staff assessment in 2024 of the most recent 250 planning application files at the time calculated the average time for a file to be assigned to a File Manager at 127 days, with the median being 42 days.

While it is important to ensure that incomplete applications are identified and kept out of the system, the review of all files by administrative intake staff and the

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<sup>8</sup> City of Surrey report, File 1855-03 by Acting General Manager of Planning and Development Ron Gill, November 14, 2024, p.4 (November 18, 2024 Council agenda).

Development Coordinator prior to file assignment is unnecessary. A streamlined intake would include:

- a pre-application process or submission review meeting to identify what items are needed (and/or if any items are missing)
- administrative review for completeness at application receipt and calculation of application fee
- assignment (but not detailed review) by the Development Planning Manager to a File Manager
- detailed review by the File Manager once assigned

Some jurisdictions have specific target times related to this stage in the application process. Alberta municipalities, for example, are required by the province to notify development applicants of the completeness (or lack thereof) within 20 days of submission. In Ontario, municipalities are required under the *Ontario Planning Act* to assess applications for completeness, and notify applicants of missing information, within 30 days.

It is worth noting that online portals for submitting applications are ideal tools to assist in the intake process, particularly when the portal can require uploading of each submission component (thereby acting as an initial completeness screening check). Software that automatically generates emails at key milestones, such as receipt of the application and file assignment, and that populates the file folders with the pertinent application information (see technology discussion in Chapter 5) could reduce staff time spent on manual data entry. In many municipalities, emails automatically generated through the portal will remind applicants if their submission is not complete, and after 90 days an incomplete file is closed. In the absence of these tools, MNC's use of a file sharing site is helpful for applicants to submit their applications digitally.<sup>9</sup>

Having a more robust and mandatory pre-application process for specific file types will help to ensure applicants have a good understanding of what is required to make an application (and that the project-specific pre-application checklist shared at the conclusion of that process is one of their required documents with their submission). As noted previously, applications that are not required to have a pre-application submission should still require a "submission review meeting" where administration/file intake clerks review the submission together with the applicant to ensure everything has been submitted, and to communicate directly with the client regarding any missing items.

Payment of the application fee was identified as a separate step in the process that can only happen once the file has been reviewed, fee calculated and fee slip generated. The fee slip, once received, must then be provided by the applicant to the

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<sup>9</sup> With the existing file sharing service in place, and the potential to introducing an online portal at some point, the Municipality should consider phasing-out paper applications.

MNC Finance Department; a receipt from Finance must be presented to Planning to confirm payment and enable an application to be deemed complete. The inability to pay a fee at the time of submission is due in part to the complexity of the application fee structure, which includes the potential of a density surcharge. Options to simplify this process, reduce touchpoints, make fees simpler to calculate, and eliminate delays between Finance and Planning should be explored.<sup>10</sup> The MNC already accepts credit card payments for property taxes, utility bills, business licences, bylaw tickets, and dog licences through the MyMuni platform. The addition of development application fees to this list seems reasonable.

### **File Assignment**

In many municipalities, the assignment of files is the responsibility of the manager of the department who makes decisions based on existing workloads, staff experience, file mix, involvement in the pre-application review and other factors. The reliance on the manager ensures that leaders maintain a clear understanding of the workload of each staff member, as well as an appreciation of the number, type and location of applications that are underway.

The MNC should consider assigning responsibility for file assignment to the Development Planning Manager, with back-up provided by the Development Coordinator to prevent backlogs during periods of absence, build in some redundancy and enable faster distribution of files. This suggested course of action would align MNC more closely to the approach taken in other municipalities, but would shift the Municipality's current approach that assigns the task to the Development Coordinator. It would also free the Development Coordinator to focus, as File Manager, on more complex applications.<sup>11</sup>

It is suggested, as well, that all files be assigned by the Manager to File Managers within two-weeks (maximum) of having been determined by intake staff as complete applications.

### **DEVELOPMENT APPLICATION REVIEW TEAM**

A Development Application Review Team (DART) is a multi-disciplinary team comprised of representatives from several departments, all of whom are involved in reviewing and commenting on development applications. The purpose of DART is to ensure that decision-makers meet regularly to discuss and decide on applications that may require compromises and collaborative solutions among municipal departments. DART members (or departments) are expected to review the

<sup>10</sup> Many municipalities are accepting online payments to allow applicants to pay at the same time they submit an application, without having to mail a cheque or pay in person. They are simplifying, and in some cases reverting to, flat fee structures to reduce the risk of application errors due to miscalculations, and make it easier for staff and applicants to understand. The City of Coquitlam automated its application fee, DCC and CAC calculations to save staff time, simplify their process and improve record keeping.

<sup>11</sup> Over the course of the review, the Municipality moved to reframe the Coordinator position to focus on more complex applications.

background on each application on the agenda and provide written comments in advance of the meeting. At the meetings, each member provides expertise and perspectives as representatives from their department, but with the broader municipal objective of facilitating development, ensuring key safety concerns are met, risks are minimized and trade-offs are made. DART is not intended as a forum for a member to advocate for an individual department's objectives. DART is, instead, a solutions-focused body in place to identify and resolve concerns that may delay or prevent application approval. The meeting frequency may depend upon the volume of applications; however, to ensure timely review DART should be scheduled at the same time at least every two weeks.<sup>12</sup>

Several communities use a similar team approach to eliminate the need for blanket email referrals to all departments with little control for the File Manager over the timeliness of responses.<sup>13</sup> Team discussions enable staff to hear and appreciate the input directly from other departments, and are an effective alternative to assigning the File Manager responsibility for determining inter-departmental trade-offs and compromises, or having to initiate multiple rounds of referrals in response to changes requested by individual departments. DART meetings bring together empowered departmental representatives to identify and address issues, and to pre-empt or resolve conflicting priorities. Staff who participate in DART are able to appreciate the roles, responsibilities and positions of others, and to understand the need for collaboration to provide applicants with a unified set of comments aimed at guiding applications towards approval.

The consistent meeting schedule, coupled with the agenda process, establishes review deadlines and places the onus on each department to come to DART meetings prepared. DART makes each department accountable to the group, and is a reminder that development review is a core function of the municipality and not just a priority of the Planning Department.

DART would be chaired by the Manager of Planning or Director of Planning and Building. Participants would include representatives from the following departments or divisions:

- Development Planning
- Subdivision (Development Engineering)
- Transportation and Drainage
- Utilities & Infrastructure (water, sewer)
- Parks and Recreation

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<sup>12</sup> Meetings may be cancelled if there are no applications to review in a particular two-week period.

<sup>13</sup> The City of Port Moody underwent a development application review process and concluded that a new team-based approach to application review was required. In 2024 the City implemented a new Development Team review structure to coordinate staff feedback to applicants. The City of Abbotsford has had this team process in place since 2014, and it has been emulated by many other municipalities.

- Building
- Community Planning
- Operations
- Fire

Staff from other MNC groups or departments, such as environmental specialists, may be requested to comment on specific files or attend meetings in response to requests from the file manager.

Not all files would require comment from each DART member. Based on the referral protocols (see next section), each file would have a summary table that highlights key points of the proposal, and that indicates which departments are required to comment. Comments provided by DART members are made available in the shared file for all members to access and view in advance of the meetings. It is the responsibility of the File Manager and an Engineering Technologist assigned to the file to collect and review all comments submitted, and to highlight and raise to any issues, conflicts, concerns at the DART meeting that require resolution. In cases where input provided by referral departments is straightforward with no obvious conflicts, brief overview at the DART meeting would be provided by the File Manager. Not all files would require extensive discussion.

It is expected that DART would require a significant time commitment from some of the MNC's most senior staff. The commitment may present some workload challenges to participating staff who must review agendas, examine relevant applications and provide comments in advance. Fluctuating application volumes and time commitments could exacerbate these challenges and could make it difficult for participants to prepare for every meeting. The success of DART, however, would rely on participating staff making preparation a priority. While video conference meetings are one way of allowing representatives to join discussions as needed, and to continue with their work when they are not, the use of video conferencing could reduce the level of connection among staff. Whenever practicable, therefore, meetings of DART should be held in person.

Additional points of guidance for DART based on experiences in other communities are as follows:

- DART meetings should follow a consistent schedule and meeting time to enable all department representatives to adjust schedules to attend
- meetings should be supported by administrative staff with the preparation of agendas, posting or sharing of application files so that all DART members have access to share and review comments
- DART meetings should have a strong chair that keeps the group engaged and focussed on the primary task, and to facilitate resolutions when there are conflicts

- DART meetings are intended to focus on issues or impacts that span more than one department (not minutiae that could be resolved in discussions or guidance within Development Planning)
- comments are provided in advance (e.g., three days) of the meeting so file managers can review the feedback to identify any potential conflicting issues for discussion at the DART meeting
- DART meetings are the primary opportunity to share department perspectives and feedback to the File Manager on files and to make decisions where conflicting feedback is provided; they are not intended as the first of several ongoing discussions
- input collected through DART is translated into Summary Review Letter requirements on which applicants will base development decisions; ongoing discussions, which can result in changing goalposts and subsequent review letters, are not encouraged
- DART is intended to help to build an awareness and common understanding among the staff concerning the development process and timing of contributions from developers (e.g., landscaping, works and services, infrastructure, amenities)
- agendas should be 'capped' to help manage staff workload in preparing for meetings

It is expected that the focus of comments from each division represented at DART would relate to a different element of a development proposal. It is also expected, however, that all participants would share a common goal — namely, to identify the changes to projects that are required to promote and facilitate quality development that is safe, that meets the municipality's standards and that makes a positive contribution to the community. The overarching purpose of DART may need to be emphasized in communications and meetings, with participants being reminded of the importance of compromise in the face of conflicting requirements.

It is worth noting that MNC does currently have inter-departmental meetings with some of the same participants proposed to be part of DART. The current review group's meetings, held every three weeks, are intended to provide an opportunity to discuss and share input on development applications. Based on feedback provided during staff interviews, however, the current approach to the meetings is less than effective. Meetings lack agendas and are unclear on purpose. Deadlines for participants to submit application referral comments, in advance of the meetings, are not set. A new DART, structured in accordance with the points outlined earlier, may be a more effective tool for resolving application-related issues.

## REFERRAL PROTOCOLS

The MNC’s inter-departmental referral process was highlighted as one of the key friction points in the initial review of the development approvals process. Staff and applicants pointed to a lack of coordination, communication and clarity. The lack of priority given to referrals by other departments was cited by Development Planning staff. Staff from several departments indicated a need for a more formal referrals process, along with support for a system in which not all files are referred, and in which departments can provide advice as needed without reviewing every file.

DART represents one approach intended to accelerate inter-departmental discussions and decisions on complex applications. In some cases, however, applications do not warrant review, discussion and input from other departments, but can instead proceed with review by Planning staff and an Engineering Technologist. Simple applications, such as those dealing with accessory dwelling units, rezonings to allow one additional single-family lot or minor variances, are examples of such files.

Enabling simple projects to proceed without the need for internal circulation or extensive referrals can help to streamline approval processes. As part of the process-mapping exercise noted earlier, protocols can be prepared to help staff identify when an application is required to be referred to departments and to be sent to DART. In all cases File Managers would have the ability to refer applications that they feel warrant input from affected departments (i.e., even when not required). The purpose of the protocol would be to establish the thresholds for typical applications that may not need review by a specific department, and to limit referrals to the departmental experts to instances where the impact is significant enough to warrant their time and expertise. At their core, protocols are a risk-based approach to the review of development applications. Protocols, where successful, ensure that greater staff resources are spent on applications with a greater risk or likelihood of having significant community impacts. Protocols help to “right-size” the review process based on application complexity and potential impact. Applications with fewer or lower risks are able to be handled by planners together with engineering input.<sup>13</sup> An example of a protocol agreement adapted from a sample used in the City of Kelowna, involving that City’s Development Engineering Department in Development Services, and the Engineering and Operations Departments, is provided in Figure 3.1 on the following page. Similar thresholds could be determined for referrals to the parks, environmental services, and the operations department.

MNC’s Engineering Department has already prepared a draft protocol or referral guide (Capacity Assessment Referrals) as part of the MNC’s modelling updates and capacity challenges. The draft Engineering capacity referral document references

<sup>13</sup> Given the MNC’s infrastructure capacity constraints, minor development applications that may not require referral to (for instance) engineering, may still be required to be logged in a servicing/equivalent unit capacity tracker for utility modelling purposes, and any interim encumbrance policy followed.

Figure 3.1  
Development Application Review Process Protocol Agreement  
Development Engineering, Utilities & Infrastructure, Transportation

EXAMPLES OF THRESHOLDS

A protocol agreement outlines the responsibilities of the Development Engineering Section in the development application review process, as well as the responsibilities of the Utilities & Infrastructure and Transportation Divisions.

1. The Senior Manager of Development Engineering is responsible (and accountable) for all decisions on works and services matters related to development applications.
2. The Senior Manager of Development Engineering will refer applications, as necessary, to the Operations & Infrastructure and Transportation Divisions for review and comment.
3. Referrals will be made in cases where the scope of a proposed development exceeds established thresholds, or in any case in which the Senior Manager of Development Engineering decides that others' expertise is required. Examples of thresholds are as follows:

Category	Examples of Thresholds
Utilities & Infrastructure	<ul style="list-style-type: none"> <li>• rezonings that would result in 100+ housing units</li> <li>• projects with drawings that differ materially from standards of <i>Subdivision Control Bylaw</i></li> <li>• projects that would result in Municipality inheriting major infrastructure (e.g., trunk line, lift station)</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• rezonings expected to add 100+ peak hour trips</li> <li>• projects where drawings differ materially from works and services standards of <i>Subdivision Control Bylaw</i></li> <li>• projects that would result in Municipality inheriting a major collector road</li> </ul>

4. All technical recommendations provided by Utilities & Infrastructure and Transportation Divisions will be considered by the Senior Manager of Development Engineering and incorporated, where possible, into a single works and services report for submission to the planning File Manager. Explanations will be provided when recommendations are not used.

thresholds above which a referral to Engineering, and capacity assessment is needed. For water, sanitary sewer and drainage, the draft threshold proposed by Engineering is that developments exceeding 20 residential units, along with all industrial, commercial or institutional applications, must be referred to Engineering. The department has also prepared draft utility (sewer and water) review processes with

the scope of work, deliverables and proposed cost scaled based on the impacts on these utilities. Review options include a quick review, simple analysis, standard analysis and advanced analysis. In all cases, the development would be added to a development tracking sheet. While the Capacity Assessment Referral and utility review policies may still be in draft, and the number of units may need adjustment, the concept aligns with the protocol process recommended here. Using the capacity referral as an example, projects that only resulted in a few residential units would not be referred to Engineering for comment. In this way the referral “traffic” between the two departments would be minimized, and the process for referrals that are required would be clearly defined.

It is important to note that efforts to reduce the number and scope of files referred to other departments are not intended to suggest that other departments’ perspectives lack value. The approach is intended, instead, to ensure that each department’s limited resources are directed where they are most needed. It was made evident during interviews for the *Review* staff in utilities, but also in other divisions, had a hard time keeping pace with referral requests. Protocols that removed some of the less impactful applications from referral departments’ plates would be a benefit to all.

#### **Other Points on Referrals**

Staff in referral departments have noted a desire for specific questions to address, or for areas on which to focus, in place of entire files to review. Planners, by contrast, are reluctant to ask specific questions that may limit or pre-empt comments from specialists in other departments. It may be helpful to create a referral summary template that is used as part of the File Manager’s initial review and preparation for referral that highlights some of the key information that the relevant referral departments are seeking, in addition to highlighting the departments that are required to comment (based on referral protocols). Ideally the same template could be used as an executive summary table for other purposes, such as a Council report. Similarly, a checklist specific to and created by each department could be used as an on-boarding and training tool to remind department representatives of some of the department-specific items to consider, along with the possible range of requests that can be made depending on the type of application under review. The referral template would not eliminate the need for a complete review at the DART table, but may help referral departments focus on the relevant details of the application.

#### **HOUSING FIRST/STREAMING**

Streamlining the development approvals process is one of several initiatives MNC is supporting in recognition of the housing and affordability crisis in the region. A faster approval process has the potential to minimize both holding costs and risks that add to the already high cost of construction.

In addition to offering a streamlined review process for all applications, some municipalities are implementing “housing first” strategies to prioritize affordable housing or other projects that deliver needed units, or that achieve other Council-

identified priorities. Developers interviewed as part of this project advocated for an approach that served to limit requirements for projects that deliver housing. Some municipalities have identified specific housing types, such as rental housing or non-market units, as a priority. Other municipalities have streamlined the process for the “small-scale multi-unit housing” and accessory dwelling units (ADUs) highlighted in provincial legislation. In August 2025, Council adopted an Affordable Housing Policy and Implementation Plan that supports staff prioritizing affordable housing developments over comparable applications, and that provides direction to encourage development of ADUs and small-scale multi-unit housing.<sup>15</sup> Strategies used by municipalities to prioritize specific projects or development types differ; all such approaches, however, recognize the importance of housing, and the need for local governments to respond to the housing crisis.

Many approaches to the prioritization of housing require local governments to diverge from the typical “first in, first out” approach to the processing of development applications. Rather than processing applications in the order received, municipalities may choose to stream application types that align with Council priorities by applying one or more strategies:

- expediting approvals or “fast-tracking” projects that meet specific criteria
- providing support to applicants that meet specific criteria
- minimizing zoning requirements, pre-zoning sites and simplifying development permit guidelines for priority uses
- providing specific communications, guides or supports, such as pre-approved designs for accessory dwelling units or small-scale multi-unit housing

Council could choose to identify specific types of projects as priority, and direct staff to place development applications with the required characteristics at the front of the processing line or, in some cases, to undertake fewer review steps. This type of approach works best in communities that have sufficient staff resources to dedicate staff to priority project streams, and that have a volume of priority projects that is not overwhelming (if all applications fit the priority definition, then nothing becomes a priority).

The following points highlight examples of “housing first” streaming policies:

- The City of Richmond has had a fast-track review process for simple development permit and rezoning applications since 2004. The process applies to small single-family, multi-family or commercial projects that are consistent with the OCP and related guidelines. The City estimates that the fast-track option can save applicants two to three months of processing time. Fast track applications pay an additional fee of \$1,297.

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<sup>15</sup> The *Affordable Housing Policy and Implementation Plan* was adopted by Council on August 20, 2025.

- The City of Port Coquitlam has a policy to expedite or fast-track projects that feature non-profit social housing, and projects that include childcare facilities operated by a non-profit society.
- The City of Kelowna has created the “Housing Development Support Team” comprised of senior city planners, with the mandate to reduce barriers by expanding options for residential lots. The team is intended to “assist property owners, housing developers and builders by providing site-specific and detailed information on housing development opportunities, processes, and requirements across Kelowna — making it quicker and easier to get the information needed to get housing built.”<sup>16</sup>
- The City of Winnipeg has an Affordable Housing Concierge Service which acts as a single point of contact to assist non-profit housing providers and Indigenous organizations plan their affordable housing applications, coordinate expedited review times, and provide guidance on next steps at different stages of the development and building permit processes. This initiative supports the increase in supply of affordable housing by supporting and developing capacity within the non-profit housing sector, as well as by fostering strategic partnerships with Indigenous housing providers and downtown developers.

There is an opportunity for staff and Council to provide expedited or concierge-level service to applications already identified as priorities within the Affordable Housing Policy. The objective for some “streams” is not only to expedite applications, but also to provide a higher level of service and support to a category of applicants. Offering a higher level of service for priority applications and/or targeted applicants may be an option for the MNC to consider.

#### DELEGATION OF AUTHORITY

The Municipality of North Cowichan delegates to staff the authority to approve development permits, as enabled by the *Local Government Act*. The exception, set out in the Municipality’s *Delegation of Authority Bylaw, No. 3814*<sup>17</sup> is for development permits that require variances. In February, the MNC amended its *Delegation Bylaw* to also authorize the Director of Planning and Building to decide development permits and development variance permits where requested variances are minor, as defined by Schedule A of the *Bylaw*. The *Bylaw* notes that the approval

<sup>16</sup> Information shared on City of Kelowna website. The Housing Development Support Team was implemented as of July 18, 2024.

<sup>17</sup> Section 22 (1) of the *Delegation of Authority Bylaw* indicates that “Council delegates its powers, duties and functions under sections 490 [Development permits] and 491 [Development permits: specific authorities] of the *Local Government Act*, to the Director of Planning and Building, subject to there being no variances of municipal bylaws involved.” Despite this wording, Section 22 (4) indicates that Council also delegates development permits that contain minor variances and development variance permits for minor variances. The bylaw includes a schedule that outlines the criteria that must be met for a variance to be considered minor.

process is subject to the registration of, or modification to, any covenants, easements or statutory rights-of way the Director determines to be necessary. Where the variances are not minor, the application must be approved by Council in accordance with development variance permit procedures.

The delegation of authority for minor variances would be anticipated to streamline the approval process for development permits and development variance permits by eliminating the step of gaining Council's approval which, in turn, would reduce the need for Council reports, associated notification requirements and the scheduling of meeting dates.

### **GOING FORWARD**

The following table (Figure 3.2) highlights the recommended actions for MNC to pursue captured under this chapter.

Figure 3.2  
Process Recommended Actions

Recommended Actions — Process	Anticipated Benefits
<b>Process Mapping</b>	
<ul style="list-style-type: none"> <li>Identify and document an internal review and approval process for each application type through a collaborative process mapping exercise, with focus on milestones, responsibilities, required feedback and decision-points for each step and department involved in the process (see <i>Appendix I</i> for examples)</li> <li>Once an internal process is established, identify standard applicant communication points</li> <li>Ensure associated requirements for each application type are relevant to the approval being sought, and are triggered at the appropriate stage in the process (i.e., rezoning, development permit, building permit)</li> </ul>	<ul style="list-style-type: none"> <li>Development approvals affirmed as a key municipal function</li> <li>Standardized and documented application approval process sets internal and applicant expectations, improves consistency and predictability</li> <li>Each department’s role and responsibilities set out</li> <li>Improved Planning department on-boarding, with staff able to understand and support a standardized approval process</li> <li>Key performance indicators able to be established in order to measure progress</li> </ul>
<b>Pre-Application Phase</b>	
<ul style="list-style-type: none"> <li>Formalize the pre-application process and internal resourcing to ensure adequate feedback is provided, including meeting minutes and a resulting application checklist</li> <li>Identify minor applications that require more minor submission review meetings in place of full pre-application meetings</li> <li>Establish pre-application submission requirements to facilitate useful staff feedback</li> <li>Determine internal process for booking meetings (e.g., consistent day of the week) and assigning staff for review</li> <li>Establish a pre-application fee, and consider a fee credit to those who proceed with an application within specific time frame (e.g., six months)</li> <li>Incorporate process into <i>Development Procedures Bylaw</i></li> </ul>	<ul style="list-style-type: none"> <li>Applicants assisted in understanding the feasibility and impacts of their proposals, as well as the process required to gain approval</li> <li>MNC able to communicate servicing constraints, and to set expectations about the application requirements and process</li> <li>Applications submitted are well-prepared and -positioned for faster processing</li> <li>Staff time optimized by keeping out proposals and concepts that are not yet suitable for application</li> <li>Transparent process created with clarity for staff and applicants</li> <li>Fee provides a recognition of the staff time involved in review, and ensures staff resources are available to support the feedback customers need to improve and prepare their applications</li> <li>Applicants who have taken the time to ensure their proposals are ready for application receive fee credit</li> </ul>
<b>File Intake and Assignment</b>	
<ul style="list-style-type: none"> <li>Ensure administrative staff are trained to determine completeness of application, calculate associated application fees and conduct submission review meetings with applicants</li> <li>Develop online option to calculate and pay application fees</li> <li>Book submission review meetings in cases where pre-application meeting not warranted</li> </ul>	<ul style="list-style-type: none"> <li>Processing times improved</li> <li>Consistent data entry promoted to allow tracking</li> <li>Targets against which to measure and monitor progress are established</li> </ul>

<ul style="list-style-type: none"> <li>• After a complete application is submitted, have files created and assigned to a File Manager within two weeks</li> <li>• Place responsibility for assigning files with Manager of Planning; Manager is not required to review file for completeness prior to assigning File Manager</li> </ul>	
<p><b>Development Application Review Team</b></p>	
<ul style="list-style-type: none"> <li>• Establish a Development Application Review Team (DART) with structured bi-weekly meetings to provide a forum for reviewing, collaborating and making decisions on applications with conflicting inter-departmental referral comments and/or requests</li> <li>• Develop a risk-based referral framework to ensure DART is used to review significant applications; focus discussions on points of conflict ambiguity</li> <li>• Support DART with a formal agenda and advance notification of meetings to enable review and comment</li> </ul>	<ul style="list-style-type: none"> <li>• Expedited review and good customer service, enabled by the resolution of conflicting regulations and internal feedback</li> <li>• Pragmatic compromises on competing priorities that would otherwise require multiple referrals</li> <li>• Development approvals established as an organization-wide priority and a collaborative process, consistent with leading practices in other municipalities</li> </ul>
<p><b>Referral Protocols</b></p>	
<ul style="list-style-type: none"> <li>• Establish DART meetings as the last stop for referrals</li> <li>• Establish referral protocol/frameworks with other departments to minimize “blanket referrals” and to limit feedback on applications to those that have may have a significant impact on the community or department</li> </ul>	<ul style="list-style-type: none"> <li>• Streamlined approval process with limited staff time spent reviewing referred applications of little consequence to the department</li> </ul>
<p><b>Housing First/Streaming</b></p>	
<ul style="list-style-type: none"> <li>• Identify criteria to expedite and give priority service to affordable housing projects (consistent with the recently-adopted Affordable Housing Policy)</li> <li>• Establish an application stream to provide enhanced level of support (with an associated fee) to non-developer applicants</li> </ul>	<ul style="list-style-type: none"> <li>• MNC able to encourage and expedite Council priority projects in a transparent way, with support for the newly-adopted Affordable Housing Policy</li> </ul>
<p><b>Delegation of Authority</b></p>	
<ul style="list-style-type: none"> <li>• Continue to monitor the number and scope of development permits with minor variances approved by the Director of Planning and Building to ensure the provisions capture the majority of development and development variance permits</li> </ul>	<ul style="list-style-type: none"> <li>• Time involved in having permits placed on Council agendas is eliminated, as is time spent preparing Council reports and awaiting Council decisions</li> <li>• Applicants may benefit from a higher degree of certainty when applications are not subject to Council consideration</li> </ul>

## CHAPTER 4 COMMUNICATION OPPORTUNITIES

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### APPLICATION FORMS, GUIDES AND CHECKLISTS

#### Overall Guidance

It is important to ensure that the development application forms and requirements are clear for applicants. It is equally important to ensure that only those documents necessary for the application are required. The MNC has some guides available online to assist applicants; those documents will need to be updated after the processes are established. The guides serve to inform applicants of the overall process and, in an effort to reduce the number of incomplete applications, the materials needed at each stage in the process. The guides and associated checklists are available online, and are shared during pre-application meetings.

Including templates for required submissions is also useful, where possible, or samples of each type of document to demonstrate expectations and illustrate the level of detail required. The MNC provides samples for building permit documents, including sample secondary suite plans and site plans. The use of templates and samples is particularly helpful for applications that are made by less experienced applicants. Schedule C of MNC's *Development Approval Information Bylaw, No. 3942 (2024)* provides a comprehensive overview of the scope of different types of supporting reports and documents that may be required from applicants. Supplying templates or samples can help supplement the bylaw by promoting a consistent format and helping establish the MNC's expectations for reports. The Municipality of Campbell River, by way of example, has developed an illustrated, easy-to-read *Development Permit Handbook* to help developers prepare Development Permit applications in ways that allow for quick review. The first part of the handbook provides clear direction on the elements needed for a complete application package. The second part provides illustrated examples of how development sites can be designed to meet the Municipality's form and character design guidelines.

Staff review of applications can be streamlined when applicants use the templates. Where common deficiencies in applications persist, FAQs and additional targeted information resources on the website and guidance in pre-application and submission review meetings to address those deficiencies can be prepared. Updated guides and samples have the dual benefit of assisting both applicants and staff, and can be particularly useful as part of an onboarding toolkit and training for new staff.

#### Timing of Materials

Applicants interviewed as part of the *Review* noted in several instances that File Managers had requested information or a level of detail at stages of the process, such as rezoning, that are related to other types of applications — an example is landscaping specifics that are needed for development permits. Some applicants noted, as well, that the materials requested differed depending on the File Manager.

The set of required supporting documents can be confirmed during the process mapping stage recommended in Chapter 3, and clarified in the application forms and guides, to assist staff in providing consistent messaging on the information necessary for each application type (and if relevant, what is required to initiate the application, and what is required prior to issuance).<sup>17</sup> The use of a digital submission portal would help to pinpoint missing pieces and require customers to take corrective action. Such a portal would also help to expedite application file set-up by eliminating the need for Development Planning administration staff to manually enter information.

### Checklists

Confirming the required materials can be an important step in the pre-application meeting, as can a checklist reminder specific to the application being sent to applicants with comments after the pre-application meeting. Checklists are a tool to provide clarity for applicants and drive higher compliance. The checklist provided after the pre-application process would then be required to be submitted with any subsequent application, should the applicant choose to submit an application. Checklists are also helpful for resubmissions, to ensure applicants have addressed the concerns raised by staff prior to resubmitting. The MNC makes good use of checklists as part of the application process for building permits.

### Templates

As noted previously, the Municipality can provide terms of reference, templates and/or guides that applicants and their consultants can use to ensure that their technical reports meet expectations. Materials provided by the Municipality could include:

- sample tables of contents that reference not only the information expected in the report, but also the preferred format and order of information to help simplify staff review
- guidance on the methodology to be followed
- sample tables, figures or plans, including the details and information expected
- generic templates or sample reports
- sample schedules, forms and covenants, including the specific language and acknowledgements that are required by the MNC, including save harmless and risk mitigation language

The decision to provide guides and templates may be taken, primarily, to ensure that professionals include in their reports the information the Municipality is seeking, particularly with respect to common applications or commonly required support

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<sup>17</sup> Applicants noted that some requirements, particularly at the building permit stage, should not be required to initiate the review, but rather should be required prior to permit issuance (such as Homeowner Warranty). Municipal practices vary, with some requiring at application stage, others prior to permit issuance. Applicants acknowledged that details confirmed or provided during the process may trigger additional supporting materials.

documents, and that it is provided in a consistent format that helps to streamline the review process for staff. The more clearly the information is laid out, the easier it is for staff to confirm that the Municipality's requirements have been met.

Several municipalities offer detailed guidance. The Cities of Kelowna and Calgary, for example, have detailed guides for geotechnical reports. The Region of Niagara in Ontario recently completed guidelines for Traffic Impact Assessments. The Municipality of North Cowichan's own *Transportation Impact Assessment Terms of Reference* as well as the *Guide to Preparation of Geotechnical Reports* are examples of guides that can assist in addressing quality and consistency in submissions. These guides, however, could go even further in setting out specific preferences and encouraging a standardized approach to the presentation of information in order to accelerate the review process for staff. The Niagara guide, for instance, is upfront about encouraging a consistent format as one of the objectives, and indicates that the purpose is to "provide a standardized approach to developers and consultants regarding the preparation and submission of a TIA. A standardized set of guidelines will assist Regional staff in reviewing TIAs and reduce revisions and resubmissions."<sup>18</sup> The guide references report contents and format, noting that:

"the TIA report must follow the format outlined in Section 3 of these guidelines. This format will facilitate efficient and effective review, discussion, and communication. Any variation from this format without prior consultation with the reviewing agency will result in delays to the processing of the application and in some cases the report may be denied and returned for revision."<sup>19</sup>

Guides and templates for professional reports that are submitted as part of the development applications are helpful; however, it is also important to review and update the MNC's overall application guides to ensure that the MNC is sharing not only the process and materials required for each application type or process step, but also samples to help illustrate the expectations of the MNC, including sample site plans (labelled with the details expected).

### UPDATED BYLAWS

Although updated processes and associated guides will assist in communicating with applicants, outdated bylaws were identified as a source of frustration for both staff and applicants — the Municipality's *Subdivision Control Bylaw* was noted specifically. Applicants cited instances where staff have requested standards that are not identified or consistent with those contained within the outdated bylaw. Updating the *Subdivision Control Bylaw* should ensure the MNC has the authority to require the desired standards, and that applicants know what standards are expected. Having staff comments that are consistent with and backed by adopted municipal policy and bylaws are important in establishing consistency and building trust with applicants.

<sup>18</sup> CIMA+, *Transportation Impact Assessment Guidelines*, Niagara Region, July 24, 2023, p. 2

<sup>19</sup> CIMA+, *Transportation Impact Assessment Guidelines*, Niagara Region, July 24, 2023, p. 4

The updating of bylaws has been initiated by several municipalities as part of development approval reviews, and in many cases updating includes refreshing standards, minimizing zoning regulations, simplifying development permit area guidelines, as well as ensuring that policies or procedures are embedded in bylaws, in some cases eliminating the need for legal agreements, which can reduce processing time. Where agreements are needed, having a standardized template can be useful.

### APPLICATION TRACKING

Speed in the processing of development applications is an important part of the Municipality's efforts to attract and facilitate quality development. Also important, however, is transparency. Municipalities with transparent approval processes are able to help customers track the progress of their applications in real time as they move through the different review stages. Applicants can see where stalls may be occurring; ideally, applicants can also see the reasons for any stalls — reasons which could include the need for applicants themselves to submit additional information or take other action.

The MNC currently shares information regarding the active planning applications through its *Building North Cowichan* platform that enables users to search for specific application types, or filter by neighbourhood or address. On the site, MNC provides information regarding:

- application date
- application type
- contact information (staff and applicant)
- purpose of the application

In addition, the site provides links to documents associated with each application (e.g., site plans), a list of the steps that are required for the application, as well as colour coding of those tasks to identify which are in progress, which are completed, and what tasks involve public input. Figures 4.1 and 4.2 provide examples from the website.

While the tasks and key milestones noted in the *Building North Cowichan* platform are helpful, more detailed and updated information would be beneficial for both customers and residents. Having more tasks or milestones will provide a better indicator of the stage (e.g., received, reviewed for completeness, File Manager assigned, internal review, review letter) to help customers appreciate where they are in the process, and allow them to minimize scheduling delays, or to help prompt them when the responsibility lies with the applicant for submitting revised plans or additional information. Several applicants identified a dashboard or easy way to visualize where their projects are in the review process as a significant improvement that would be appreciated. Ideally the tool will be helpful not only for applicants and the general public, but also for staff in tracking applications and workloads. The tool is also intended to minimize repeated inquiries from applicants seeking updates on application status.

**Figure 4.1**  
Sample Online Application Information

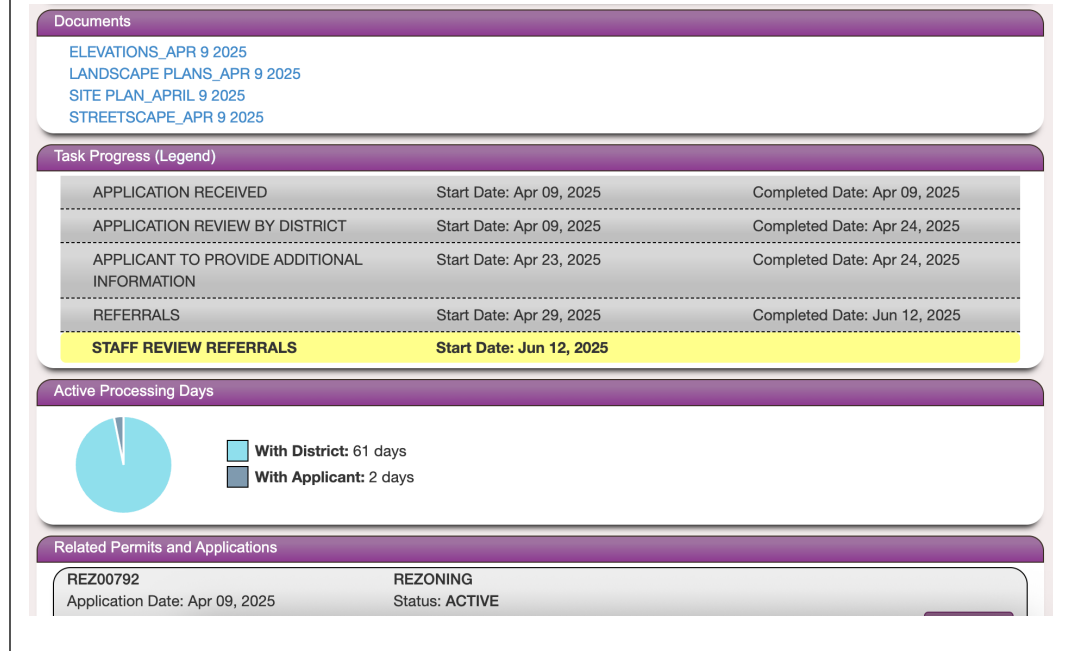
Additional Resources		
<a href="#">Application form.pdf</a>		
<a href="#">Letter of Rationale.pdf</a>		
<a href="#">Preliminary Architectural Drawings.pdf</a>		
Scheduled Meetings (Legend)		
3rd Reading	IN-PROGRESS	Meeting Date: May 07, 2025
Tasks (Legend)		
1st Reading	Started: May 07, 2025	
2nd reading	Started: May 07, 2025	
3rd Reading	Started: May 07, 2025	
External Referrals Required		
Ministry of Transportation Approval Required		
Fulfillment of conditions of adoption		
Bylaw to Council for Adoption		

**Figure 4.2**  
Sample Online Information – Additional Resources and Tasks

Additional Resources		
<a href="#">Concept Site Plan OCP00026 ZB000133</a>		
Tasks (Legend)		
1st Reading	Started: Aug 16, 2023	Completed: Aug 16, 2023
2nd reading	Started: Oct 04, 2023	Completed: Oct 04, 2023
Public Hearing Date Set	Started: Jul 17, 2024	Completed: Jul 17, 2024
3rd Reading	Started: Jul 17, 2024	Completed: Jul 17, 2024
Fulfillment of conditions of adoption		
Bylaw to Council for Adoption		

Other cities in British Columbia (and beyond) provide more detailed tracking for rezonings, development permits and other property applications. Figure 4.3 provides an example from the District of Saanich, which uses the same Tempest platform as the MNC. Saanich’s tracking site provides a more detailed list of milestones or tasks, and shares the number of days the District has spent processing an application, and the time that the customer has been working on fulfilling requirements.

**Figure 4.3**  
**District of Saanich Application Tracking Information**



While the MNC should strive to provide a range of information for both applicants and staff, improvements rely in part on well-established processes and milestones determined through the process mapping exercise (recommended previously). It is important to establish a baseline of data and ensure that the applications and key milestones are being entered in a consistent way to support tracking and analysis. Ultimately the enhanced level of detail will enable a higher degree of real-time tracking for all types of applications, and provide a robust level of information to applicants and their consultants. Such an approach would provide a range of benefits to proponents:

- *Work Planning* — Proponents of development projects under review are often required to coordinate teams of different development professionals, consultants and others who contribute information, studies, drawings and other materials to applications at different points in the overall process. Applicants who are able to track their submissions are well-positioned to schedule the various teams efficiently, and in so doing, optimize the timing and cost of deliverables.
- *Financing* — Most proponents need to secure financing for their development projects. Applicants who are able to track the progress of their submissions are able to optimize the timing and cost of financing. When combined with accurate timelines and milestone targets (see next point), application tracking can also help applicants manage cashflow.

- *Certainty* — Application tracking systems enhance the sense of certainty experienced by development proponents in the overall development approval process. Proponents who can monitor the progress of their submissions are able to see that their files are under active review, even if the review is not going as quickly as the proponents would like. This ability, in and of itself, improves the development experience by eliminating the need to "chase up" files, and by reducing the stress of the unknown.

Application tracking also provides benefits to the MNC, including the ability to:

- reduce the amount of time spent by planning staff in responding to inquiries on the progress of files
- collect data and report on average times required to reach various milestones in the processes (reports that would further facilitate effective work planning, optimize financing and enhance certainty)
- set timeline targets and performance indicators for key milestones

It is recognized that until the MNC's technology allows for automatic population of the data, the effort of maintaining the data that Tempest uses to update *Building North Cowichan* will continue to rely on staff to manually enter information and post linked documents.

### TARGET TIMELINES

A proper application-tracking system allows staff to review data and determine target timelines for processing. While not the first priority, establishing target approval timelines that are reasonable and reliable would help to demonstrate the MNC's commitment to customer service, would assist in fostering a positive development environment, and — indirectly — would help to address the need for more housing in MNC. Conversely, timelines that are unreasonable and unpredictable, and that include unexplained delays, would undermine the Municipality's efforts to attract quality development.

Many municipalities, including the MNC,<sup>20</sup> identify for applicants the average processing times for different application types — often expressed in ranges of weeks or months — required to reach key process milestones, and to obtain development approval. Fewer municipalities, however, set precise target times that applicants can rely on in their project planning, and can use to hold departments accountable. Some jurisdictions that have set explicit targets in the past, however, or that continue to set targets, include:

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<sup>20</sup> The MNC guides currently state that the development permit process will take two to four months, development variance permits are three to five months and zoning amendments are six to twelve months.

- *City of Surrey* — The City of Surrey undertook a Guaranteed Permitting Timelines (GPT) program to improve the speed of and predictability in the land development process. Guaranteed targets have been set out for a limited range of development approval processes:<sup>21</sup>
  - the building permit process for new single-family, single-family alterations and new tenant improvement projects
  - the rezoning process for single-family, multi-family, commercial and industrial projects

Figure 4.4 presents Surrey's current processing times and guaranteed target times, as of July 2025.

**Figure 4.4**  
**Processing Times (July 2025) and Guaranteed Targets**  
**Municipality of Surrey**

Permit type	Current processing time	Established targets
Building Permit: New Single Family	17.1 weeks	10 weeks
Building Permit: Addition & Renovation (Single Family)	3.4 weeks	6 weeks
Building Permit: New Tenant Improvement	13.9 weeks	10 weeks
Rezoning: Single Family	6.4 weeks	12 weeks
Rezoning: Multi-Family, Commercial, & Industrial	7.9 weeks	16 weeks*
Site Servicing Reviews (related to Servicing Agreements)	3.3 weeks	2.5 weeks

\*Add 4 weeks for projects requiring ADP review

<sup>21</sup> Processes for development variance permits, development permits, subdivision approval, a full range of building permits and a range of other approvals are not included in the program at this time.

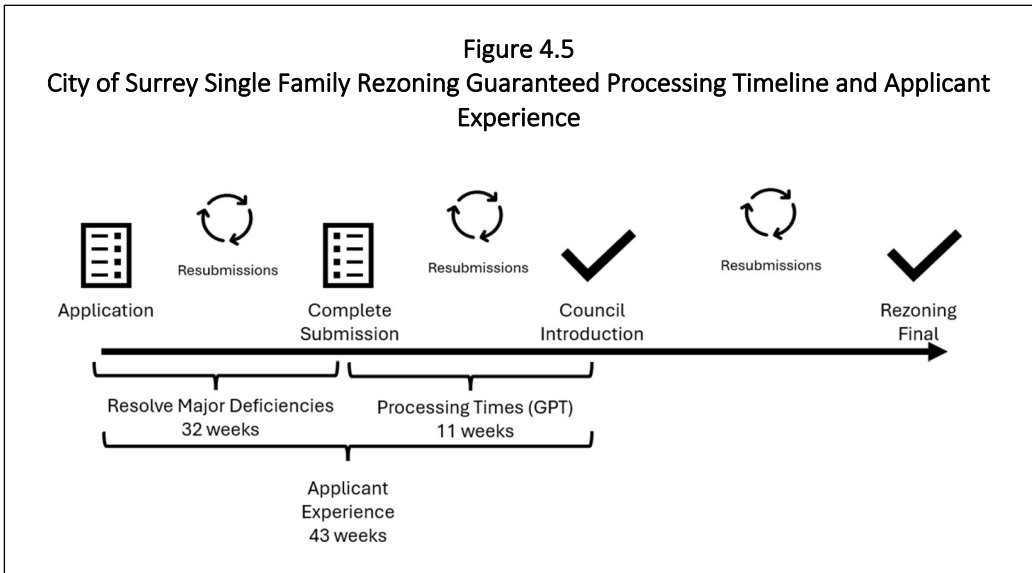
It is important to note that Surrey's target times do not cover the entire application processing period. In the rezoning process, timing begins after the City has determined that the application is entirely complete, and ends after Council approves second reading. Included in this target period is the review stage during which the application is referred to internal departments and external agencies, comments are received back, the Advisory Design Panel examines the file, and Council has provided second reading. When the City misses a guaranteed target, the application is assigned priority status for staff review.

The City reported back to Council on the GPT program in November 2024 and noted that although it was hitting targets based on the processes within the City's control, the overall application approval experienced continued to remain lengthy (see Figure 4.5). The process delays were attributed largely to application deficiencies. Based on that feedback the City initiated a pilot program to identify and reduce deficiencies through a more robust pre-application process.

- City of Edmonton* — Edmonton sets and publishes target processing times for rezonings, subdivisions and servicing agreements. The target for a "complex rezoning" is 23 weeks (160 days) — a period of time that, unlike in Surrey's case, runs from acceptance of the application through to Council approval, and includes time required by applicants to address issues raised by internal and external referral bodies. Edmonton reports on progress quarterly. In 2025 Q1, the City processed 78% of complex rezonings within its target timeline. The average for all rezonings in the same period was 162 days. The target for non-complex rezonings is 90 days, and in the first quarter 40% of the non-complex rezonings were completed within that timeframe, with the average being 96 days.



**Figure 4.5**  
City of Surrey Single Family Rezoning Guaranteed Processing Timeline and Applicant Experience



- *District of Saanich* — Saanich recently introduced a suite of improvements to modernize its development approval process, including:
  - a digital portal
  - a multi-disciplinary pre-application process
  - a reduction in the number of reviewers and decision points

Unlike some of its municipal counterparts, Saanich did not set specific targets. At the Committee of the Whole meeting where the modernization program was introduced, two letters submitted by community members commented on the lack of target timelines, calling for “a stronger commitment to establish a target timeline for approvals, or to treat housing production as a key performance indicator.”<sup>22</sup> This feedback highlights the desire from the development industry and residents to have targets established, and results measured and reported.

Establishing realistic approval timelines is a laudable objective and important long-term goal for MNC. Having publicly-stated target timelines is important for transparency — that is, in demonstrating the municipality’s willingness to be held accountable. The ability to identify and track timelines, however, requires an established process that is consistently monitored. Determining the process, identifying key milestones and establishing baseline data are necessary first steps.

#### **DEVELOPMENT LIAISON GROUP**

In the land development process municipalities play an important regulatory role. As regulators, staff review development applications against development policies and regulations that are designed to support the community's vision, promote good planning principles, provide the servicing necessary to accommodate growth, address housing and related needs, and protect the municipality from unnecessary risk. The regulatory role is critical, and needs to be resourced and structured appropriately to be both effective and efficient. It also needs to be accessible, transparent and fair to development proponents.

Good development requires municipal staff to be effective regulators. Good development also, however, requires municipal staff to be effective facilitators of development. Staff involved in the development process need to liaise with proponents, hear their ideas, discuss their plans and — where possible — collaborate on finding solutions to issues that arise.

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<sup>22</sup> July 7, 2024 email letter on agenda from Homes for Living. A second letter dated July 8, 2024 noted “Although it is clearly stated in the document that the most important goal of this project is to reduce timelines, there is no commitment to a specific timeline, nor is there a methodology proposed to determine what that target would be. Neither is there a commitment to measure or report on average application processing or approval times. The KPMG report on this same topic recommended implementing a Service Standard that would let applicants know an anticipated timeline for their project to move through the process, and it is important that this recommendation is not lost by the second group of consultants.”

Several applicants interviewed as part of the process noted a lack of understanding or appreciation by staff of the economic challenges facing applicants and the development industry, and the impacts of delays and uncertainty as part of the process. At the same time staff noted frustration with applicants that do not meet municipal standards or expectations.

Staff undertake formal and informal training to build their knowledge; they also build experience over time in the department. Professional development opportunities rarely focus on building an understanding of development — its economics, the challenges faced by its proponents, and the implications of staff decisions on it. Similarly, there are few opportunities for development proponents in North Cowichan to expand their understanding of the community's development-related needs, the pressures and concerns facing staff, the rationale for processes and requirements, and the implications of proponents' decisions and actions for the MNC.

Some communities have created a Development Liaison Group to bring staff members and local development community representatives together to share information, discuss issues and build rapport. The Groups are established to ensure that information is being shared, but also to provide educational opportunities to build a broader understanding of the respective roles, responsibilities and shared purpose in the community.

The creation of a Development Liaison Group may provide opportunities for development planners and planning technicians, as well as engineering technologists, environmental and other staff involved in the development approval process, to learn from leaders in the development sector about the economics of projects, the pressures and challenges facing applicants, and the implications of different actions and policies for development projects. The Group could also help the development sector better understand the MNC's development goals, its development requirements and the reasons behind them, and the implications of proponents' actions for the development process. The Municipality's servicing challenges, and the ongoing efforts of staff to address them, would be particularly important to understand.

The Development Liaison Group, which could meet quarterly, would be structured with equal numbers of MNC and development sector participants. One MNC representative — ideally the General Manager or Director — and one development sector representative could co-chair the Group, and could together create agendas and run meetings. Clear terms of reference, drafted by the MNC for review by the Group, would help to set out the purpose of the body and the meeting procedures to follow. Members could be replaced annually or every two years in order to facilitate broader participation.

The Group, it should be emphasized, would primarily serve as a forum for information exchange between staff and the development sector, not as an advisory

committee to recommend changes to the MNC. To the extent that the Group felt compelled to give advice on key matters, such advice would be directed to the Director of Planning and Building. The Group would not be established as a Council advisory committee, and would not receive instructions or issues to review by Council.

#### **GOING FORWARD**

Figure 4.6 on the following page highlights recommended actions related to communications.

**Figure 4.6**  
**Communication Recommended Actions**

Recommended Actions — Communication	Anticipated Benefits
<b>Application Forms, Guides and Checklists</b>	
<ul style="list-style-type: none"> <li>• After processes are established, update and post application guides</li> <li>• Create checklists, including one that is a product of pre-application meetings (that then must be included in applications)</li> <li>• Provide samples of required plans and documents, and templates for supporting professional report format and content</li> </ul>	<ul style="list-style-type: none"> <li>• Clarity and transparency for applicants</li> <li>• Samples and templates help drive compliance, ensure professional reports meet staff expectations and streamline staff review</li> <li>• Guides, checklists, samples and templates help support an onboarding toolkit and training for new staff</li> </ul>
<b>Update Bylaws</b>	
<ul style="list-style-type: none"> <li>• Update the Subdivision Control Bylaw</li> <li>• Update other bylaws (Development Procedures) to reflect processes</li> </ul>	<ul style="list-style-type: none"> <li>• Staff authority clarified, applied consistently</li> <li>• Clear expectations set out for applicants</li> </ul>
<b>Application Tracking</b>	
<ul style="list-style-type: none"> <li>• Enable applicants to view where their applications are in the process</li> <li>• Publish average timelines required for applications to reach key review milestones to provide predictability for applicants</li> </ul>	<ul style="list-style-type: none"> <li>• Transparency of process enhanced</li> <li>• Additional clarity and certainty provided to applicants</li> <li>• Applicants assisted with timing and scheduling</li> <li>• Less staff time spent responding to inquiries on status of applications</li> </ul>
<b>Target Timelines</b>	
<ul style="list-style-type: none"> <li>• Create, publish and report annually on progress toward timeline targets for milestones in the development approval process</li> </ul>	<ul style="list-style-type: none"> <li>• Clarity for applicants; better understanding by applicants of the application process</li> <li>• Transparency of process enhanced</li> <li>• Expectations identified; progress measured</li> </ul>
<b>Development Liaison Group</b>	
<ul style="list-style-type: none"> <li>• Create Development Liaison Group as a forum to discuss development issues, municipal regulations and upcoming changes</li> </ul>	<ul style="list-style-type: none"> <li>• Opportunity to discuss and share perspectives on major development issues (including servicing challenging)</li> <li>• Improved understanding and appreciation of part of participants the challenges of regulating development, and the costs and risks associated with undertaking different types of development projects</li> <li>• Ability to identify and action process, policy and other changes</li> </ul>

## CHAPTER 5 TECHNOLOGY OPPORTUNITIES

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Technology is an important component of a more efficient application review process. Technology, properly set up and applied, enables staff to collaborate with one another and with applicants in file submission and review. Staff in different departments can view and comment on files concurrently, identify required changes to submitted (and re-submitted) plans, extract key pieces of data, trigger notifications, and track file progress.

Different departments at MNC have technology platforms that are designed to facilitate department-specific tasks; they are not, on the whole, designed to facilitate connection with platforms used by other departments. The inability to connect creates barriers for sharing and automating tasks.

Purchasing new systems can be cost-prohibitive; there may be opportunities for training to ensure staff are able to better leverage the capabilities of existing software. Continuing to cope with different or outdated systems, however, can also have a significant cost to the MNC in the form of staff time. Staff have indicated that the current Tempest platform owned by MNC is no longer being updated, and that staff have been assessing other software options.

The current technology does not appear to meet the needs of applicants and staff. Optimal features that would help facilitate better collaboration and faster processing include:

- e-permitting solutions that enable applicants to submit development applications and associated supporting items (e.g., drawings, professional reports) digitally through an application portal<sup>23</sup>
- dashboards that applicants can access to monitor the progress of their application files through each milestone in the review process, and to view relevant document requirements and meeting dates scheduled for their applications

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<sup>23</sup> E-permitting solutions also help to filter incomplete submissions, and can pull key information to create and populate files, minimizing the need for manual data entry. In British Columbia, many municipalities have embraced e-permitting as part of larger technology strategies. Some cities have not realized the full benefits of the initiative; many, however, have realized significant gains in process efficiency, and most are pursuing some form of e-permitting further, particularly in high-growth areas of the province. The City of Nanaimo, as one example, has achieved process-related benefits from the selective application of e-permitting, and is now pursuing a broad roll-out across many permit types.

- tracking options that enable staff to track and measure times to achieve processing milestones and overall turn-around times
- options to automatically populate files with data from the application to reduce manual entry of data
- e-commerce solutions that accept online payments (credit card) for application fees, but also that automate fee calculations
- generation of automatic notifications to applicants (and staff) when key tasks are complete (e.g., receipt of application, receipt of payment, application confirmed complete, file manager assigned)
- file-sharing to enable multiple referral departments or users to access and view the application files and provide comments concurrently, and view comments provided by other departments
- ability to track and report a building permit application 'queue' or number-counter to share information on how many building permit applications are in the queue as an indicator of the turnaround time to expect
- ability to book building inspections online
- ability to report out on activities (staff indicated that reporting from Prospero is an issue)

The current system leaves much room for improvement, with the lack of functionality and interconnection is being significant frustrations for staff and applicants. As currently configured, the system is not ideal for the collection of processing data and timelines at each milestone throughout the process, or the tracking of workloads and sharing of files and inputs across multiple departments. All of these shortcomings, if addressed, would streamline and accelerate the process, and would also provide a higher level of service to customers. The improvements would also help to free staff time involved in receiving files and responding to requests for updates.

This *Review* does not include an assessment of the best technology solution for the MNC, but instead highlights capabilities and outcomes that would assist in streamlining the application process and work of staff involved in the development services function. Staff at MNC indicated that they are assessing the available software options and tools such as e-apply and Cloudpermit, as well as potential opportunities to better leverage the Tempest platform to determine the best approach to improve functionality not only in Development Planning, but across all departments involved in the function.

#### GOING FORWARD

While it is acknowledged that the MNC is already reviewing its software options, it is

important to recognize that while not a silver bullet, technology plays a critical role in the efforts to help MNC improve processing times, and minimize the amount of staff time involved in coordinating referrals and entering information. To optimize the opportunities for improvement the Municipality should consider upgrades that at a minimum enable:

- an online portal to expedite the transition from paper-based submissions to digital submissions
- an application monitoring dashboard to allow for greater transparency and ability to track where applications are in the process with a finer level of detail than currently available
- file sharing to collect and view comments from internal departments in one document

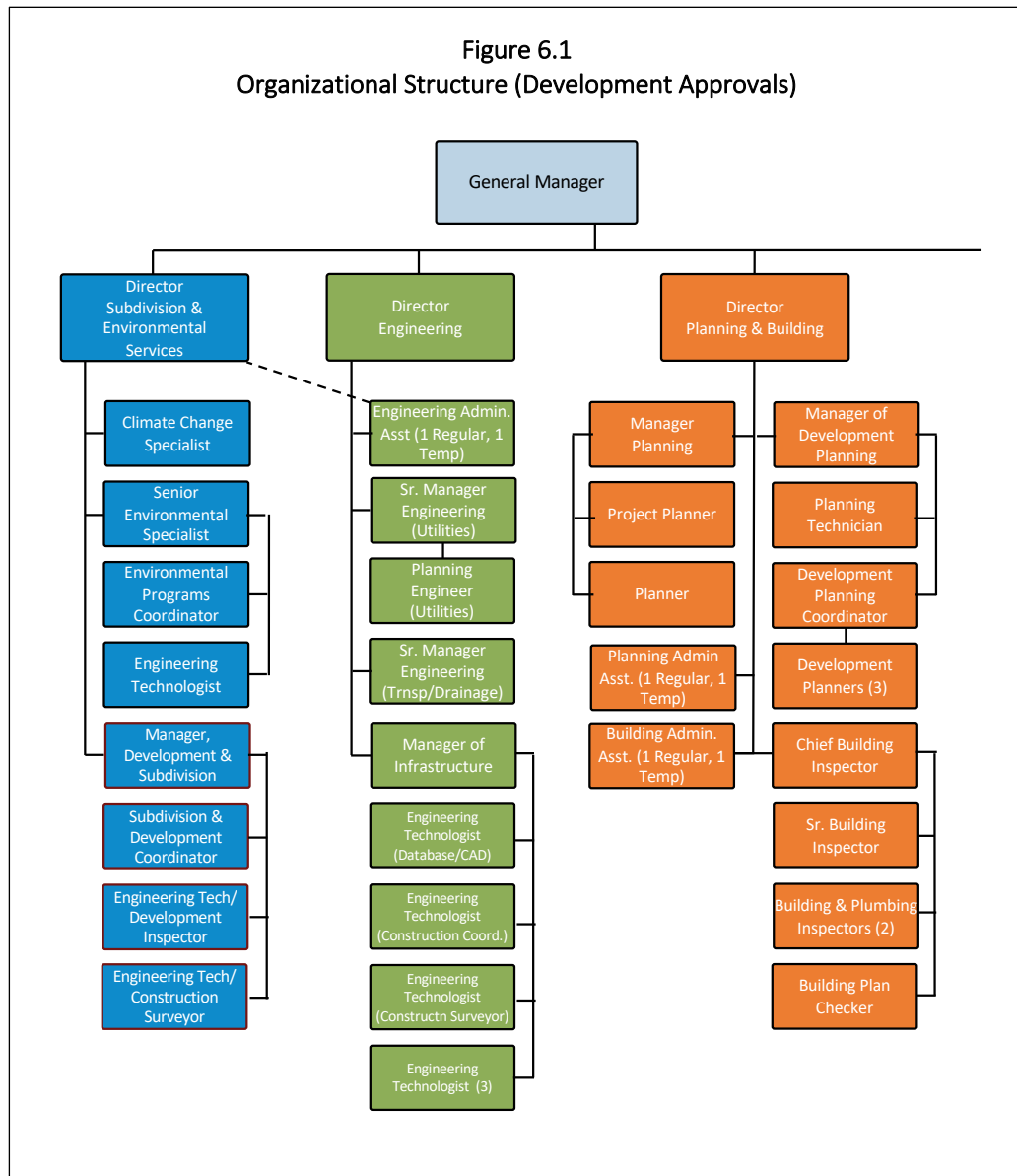
It is anticipated that technology upgrades would be coordinated through the IT and Business Solutions team, with input and guidance from planning manager or coordinator. Figure 5.1 includes the key actions for the MNC to consider.

## CHAPTER 6 STRUCTURE AND RESOURCE OPPORTUNITIES

This chapter focusses on the MNC’s organizational structure, as well as the staffing levels, and the impacts they have on development approval processes.

### ORGANIZATIONAL STRUCTURE

Figure 6.1 highlights the key departments involved in development approvals, including Planning and Building, Engineering and Subdivision and Environmental Services.



## Subdivision and Environmental Services

North Cowichan has a Subdivision and Environmental Services Department that is responsible for environmental initiatives, as well as subdivision review and development-related engineering. The Department's subdivision responsibilities, as noted in the 2025 business plan,<sup>24</sup> are reiterated as follows separated into subdivision and development engineering categories:

- Subdivision
  - process subdivision applications through to final approval
  - respond to subdivision inquiries
  - provide input to planning and building applications including OCP amendments, zoning, development permits, and building permits
  
- Development Engineering
  - review civil works design drawings for on and off-site construction
  - inspect municipal infrastructure constructed by developers (water, sanitary sewer, drainage, roads)
  - process applications for municipal services in coordination with Engineering
  - coordinate major development projects

North Cowichan's structure is unique in having Subdivision and Development Engineering functions located in a department that is separate from both the Planning and the Engineering divisions.

### Subdivision

It is not uncommon for municipalities to have dedicated subdivision staff that are focussed on subdivision review and approval, in part because of the emphasis on engineering specifications and on-site servicing needs involved with subdivisions, as well as the distinct statutory role, training and responsibilities of the Approving Officer. The subdivision review and approval function, however, is most typically located within a broader development services department. Similar to other development applications, applications for subdivision approval depend on a review of both zoning and engineering requirements, and often have accompanying development permit or variance applications.

The existence of a separate department, and the separate application process, was noted as a source of some confusion for applicants. Having the subdivision review function under a broader development services umbrella may represent a more holistic and defensible structure for the development services function. A decision to bring staff involved in the function into the same department could result in greater staff interaction, and greater collaboration on application files. While the subdivision staff may conduct reviews independent of development planners, they could benefit from sharing the same pre-application and intake process and administration

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<sup>24</sup> Presented to Council on January 15, 2025.

resources, as well as the same front counter for inquiries. In addition, combining the two departments may enable more efficient allocation of resources and triaging of applications based on department and Council priorities, particularly if subdivisions become less frequent and may allow for opportunities for both planners and engineering technologists to work more closely together and expand their understanding of the broader development process.<sup>25</sup>

### Development Engineering

Many municipalities grapple with the question of whether the development engineering function — the review of the works and services proposed by developers to facilitate development applications — should exist as part of Engineering Services or placed under Planning and Building. This question has been tackled by many high-growth municipalities in British Columbia; different places have reached different conclusions. Municipalities of similar size to North Cowichan — the cities of Penticton, Vernon, Campbell River and Courtenay are examples — as well as larger cities of Nanaimo, Delta, Coquitlam, Port Coquitlam and Kelowna, have elected to place development engineering within a development services department, or under the authority of the Director or General Manager (as the case may be). Others, such as the cities of Langford, Langley and Squamish, have chosen to keep the function under the authority of the head of Engineering, who is ultimately responsible for all infrastructure.

As noted, in the MNC the development engineering function is currently divided between the Engineering department, which lists development engineering as one of its key functions, and the Subdivision and Environment department, which is responsible for approving subdivisions, including the associated works and services, and most on-site services. The Subdivision and Environment department is staffed with two engineering technologists under the Manager of Subdivision and Development; the Director of the department is an engineer.

There are strong arguments in support of having development engineering included within either Planning or Engineering. There are also certain success factors that are common to both options — the need for good inter-departmental communication and respect for assigned authorities being key. In the end, the "right" choice for any municipality may be determined by the desired approach to development, and by the message leaders wish to send to staff and the development community. Consider the following points:

- *In Planning* — Leaders who place development engineering in a planning or development services department seek to emphasize a desire to facilitate development. In the MNC, this approach would result in the Subdivision group reporting and being accountable to the Director of an expanded Planning and

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<sup>25</sup> Conventional single-family subdivision may become less frequent; however, such changes may not translate into less subdivision work, as airspace, and townhouse strata applications may become more frequent.

Building group focused on finding solutions to development issues. To be clear, infrastructure considerations would remain important under any structure. But infrastructure requirements, designs and approvals in this structure would be determined within Planning and Building, in accordance with published technical standards and criteria, and any inter-departmental protocol agreement for referrals. Any conflicts with Engineering and/or Operations would be handled by the Director of Planning and Building, or by the General Manager that oversees Engineering, Planning and Operations.<sup>27</sup>

- *In Engineering* — In municipalities that have development engineering located within Engineering, the concerns of engineering infrastructure and utilities are paramount. For the MNC, this structure would have the development engineering team reporting through and being accountable to a Director of an expanded Engineering team. Engineers and technologists in Engineering would be involved in decisions on reviews and development works. The Director of Planning and Building would have no authority to direct the engineering review of development files in this structure. Any conflicts between Planning and Engineering would be handled by the respective directors of Planning and Building and Engineering, or by the General Manager that oversees both groups.<sup>28</sup> Note that with this structure, subdivision review would be placed within the Planning and Building as noted earlier.

If the MNC wishes to both streamline its development application review process, and communicate to the community and staff that efforts to facilitate good development are a priority, the Municipality should consider placing the development engineering staff in the Planning and Building Department. Given North Cowichan's significant infrastructure challenges, however, it may be more important to place development engineering in the Engineering Department. This step would ensure that all servicing matters would be handled within Engineering, under the Director of the Department.

### Environment

Under the suggested structure, Environmental Services would move with the subdivision and development engineering functions to Planning and Building, for placement within the Community Planning division. Environmental Services reviews and provides advice on some development applications, in addition to group's work on climate and other programs and initiatives. It was noted that when staff in Environment currently receives development referrals, the staff are not subsequently involved with revisions or final product. Relocating the environment function to the Planning and Building department may help to close that feedback loop and allow for Environment to better monitor progress on development files that involve environmental issues.

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<sup>27</sup> In addition to Parks and Recreation

<sup>28</sup> In addition to Operations and Parks and Recreation

## Land Management/Property Services

The spotlight on MNC’s servicing constraints over the past year has highlighted the need to secure rights-of-way and easements, acquire land and execute agreements as part of the development approval process to ensure services can facilitate growth. The MNC does not currently have a land management or real estate department that manages this process — the gap is filled by either the subdivision and environmental services team, or the engineering team. Not all municipalities have this expertise in house; however, some similar-sized communities, such as Campbell River and Penticton, have staff with designated positions responsible for these services. Larger municipalities such Nanaimo have a real estate department as part of Development Services to administer the City’s land assets.

Some of the functions typically encompassed within land management include:

- acquiring land for municipal projects, including projects such as roads, parks, recreation facilities, municipal buildings
- providing strategic advice on the management of land assets
- coordinating the sale and disposition of surplus lands
- providing property management services through the preparation of lease and licence documents
- managing property issues that arise from municipal capital projects, including working to ensure private property is restored to the owners’ satisfaction following the completion of a construction project
- administering encumbrances on private property and securing rights of way for utilities

While the functions may not warrant a full-time position in the MNC at this time, the role could potentially be combined with responsibility for delivering the MNC’s capital projects. The MNC’s need for infrastructure upgrades and significant capital projects is expected to require dedicated senior staff resources in the years ahead.

## Other Functions

In February 2025 the MNC released its *Economic Development Action Plan*. The *Action Plan* identifies actions the Municipality can take to support the continued development of a strong and sustainable local economy. Strategic Priority 1 in the *Action Plan* identifies actions designed to improve the local business climate. One of the actions is to “streamline the development approvals process”. The *Development Services Function Review*, presented in this report, address this action. Changes put forward in this report are designed to give developers and other applicants the certainty they need to develop in North Cowichan, and are designed to make it both easier and faster to develop. Such outcomes can result in significant economic benefits for the local economy.<sup>29</sup>

<sup>29</sup> Efforts taken by the Municipality to address the infrastructure will be needed to enable developers and other applicants to take full advantage of the recommended changes to the development services function.

The *Action Plan* identifies a broad range of other efforts the Municipality can take to build the local economy. Some of these efforts are dependent on other jurisdictions and partners; others, however, can be pursued by the Municipality itself. Responsibility for overseeing the implementation of the *Action Plan* could be given to the Planning and Building Department — specifically to the Community Planning division. This division is involved already in the development of plans and strategies focused on community development, broadly defined.

### STAFF RESOURCES

In addition to the restructure opportunities referenced above, there appears to be a need for additional administrative support for the development services function within the Planning and Building Department. The Department has had additional managerial support provided over the past few years, but has lacked corresponding increases in the front-line and administrative staff support. This report has emphasized the importance of a new pre-application review process, the intake process in screening and assessing complete submissions, as well as entry of consistent data to facilitate file tracking. Additional full-time dedicated administrative or planning clerk support would help to optimize the impact of changes recommended to address these needs. Sufficient capacity, continuity and redundancy to bridge staff holidays, vacancies and to support onboarding of new staff without delaying the application review process is also needed. Additional support would enable planners to focus on processing files.

One administrative assistant was approved in the 2025 budget — a decision that helped to create a more permanent solution for the building department, which had been relying upon casual and temporary support. The Municipality should consider building on this improvement by adding one more administrative assistant (planning clerk) to assist with application intake, responding to inquiries and file data entry.

Previous sections of this report have also highlighted the adjustment of some of the roles and responsibilities of the existing positions within Planning and Building, particularly with respect to the assignment of files to File Managers. It is expected that the exempt positions of Manager and Development Coordinator would, going forward, be more involved in the process as File Managers to handle the review of complex files. These positions — in particular that of the Development Coordinator — would be important in leading the restructuring and documentation of the development approvals process and protocols for referrals.<sup>30</sup>

### GOING FORWARD

Based on the current servicing challenges, the MNC may want to consider a structure that:

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<sup>30</sup> It should be acknowledged that the Municipality was able to reframe the Coordinator position, during the review process, to capitalize on the skills of a staff member placed in the position. As of the time of report submission, the position has been adjusted to include the review of complex files.

- places a greater priority on capital projects over the coming years as works are needed to address identified servicing challenges
- Includes a position with dedicated responsibility for property/land management experience to manage the MNC's real estate assets, including easements, and handle property-related matters such as land acquisition, leases, and access agreements
- moves development engineering staff into Engineering
- includes subdivision review within the broader Planning and Building department, consistent with most other municipalities of similar size
- relocates the environmental specialists, coordinator and technologist that are currently within the Subdivision and Environmental Services Department, to the Planning and Building Department to provide continuity and maintain the team synergies that have already been built in the existing subdivision and environment department

DEVELOPMENT  
SERVICES FUNCTION  
REVIEW

REPORT

**NEILSON**  
STRATEGIES

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Figure 6.2  
Structure and Resource Recommended Actions

Recommended Actions — Structure and Resources	Anticipated Benefits
<b>Organizational Structure</b>	
<ul style="list-style-type: none"> <li>Restructure to combine development-related groups in the Planning and Building Department</li> </ul>	<ul style="list-style-type: none"> <li>A more cohesive, development-related team focused on facilitating development</li> <li>Elimination of communication barriers inherent in having multiple departments responsible for the main components or aspects of the development approval process</li> </ul>
<ul style="list-style-type: none"> <li>Move development engineering into the Engineering Department</li> </ul>	<ul style="list-style-type: none"> <li>Ensures that all servicing matters, in the immediate term, handled within Engineering under the Director of the Department</li> </ul>
<ul style="list-style-type: none"> <li>Address gap in lands management to provide knowledge and guidance on property acquisitions, leasing, easements, and management of civic land, to support the implementation of municipal capital projects</li> </ul>	<ul style="list-style-type: none"> <li>Lands management expertise and dedicated support for major capital projects in place</li> </ul>
<b>Staff Resources</b>	
<ul style="list-style-type: none"> <li>Provide one additional full-time administrative support to Planning and Building</li> </ul>	<ul style="list-style-type: none"> <li>Additional resources to support development of new processes, and of application intake and file management and tracking functions</li> <li>Increased redundancy and improved functioning in times of absences/turnover and overall performance in development review</li> <li>Capacity to allow staff to support functions such as updated website, file tracking, user guides, forms, checklists, etc. as well as customer service</li> </ul>

## CHAPTER 7 IMPLEMENTATION

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Many of the recommendations presented in this report will require significant time and coordination to implement, if endorsed by the Municipality. To assist with implementation, recommendations have been brought together and assigned priority rankings (Figure 7.1). Recommendations proposed for priority implementation in the short-term are indicated in red. Those proposed for implementation in the mid-term are shown in yellow. Green is used to identify recommendations that are proposed for implementation over the longer-term.

The Municipality should consider giving highest priority to the recommendations on structure and process. Changes to structure, if addressed first, would bring key staff together into an enlarged Planning and Building Department, which in turn would position them well to proceed with process mapping and other process-related recommendations. The changes related to processing would ensure greater consistency, transparency and speed in the review and approval of development applications.

Appendix I provides sample process flow charts for components of the overall process, including the pre-application, intake process and DART review process as starting points for discussion.

Figure 7.1  
Suggested Priorities for Implementation

Recommended Action — Process	Priority
<b>Process Mapping</b>	
<ul style="list-style-type: none"> <li>Identify and document an internal review and approval process for each application type through a collaborative process mapping exercise, with focus on milestones, responsibilities, required feedback and decision-points for each step and department involved in the process (see <i>Appendix I</i> for examples)</li> <li>Once an internal process is established, identify standard applicant communication points</li> <li>Ensure associated requirements for each application type are relevant to the approval being sought, and are triggered at the appropriate stage in the process (i.e., rezoning, development permit, building permit)</li> </ul>	*Highest priority
<b>Pre-Application Process</b>	
<ul style="list-style-type: none"> <li>Formalize the pre-application process and internal resourcing to ensure adequate feedback is provided, including meeting minutes and a resulting application checklist</li> <li>Identify minor applications that require more minor submission review meetings in place of full pre-application meetings</li> <li>Establish pre-application submission requirements to facilitate useful staff feedback</li> <li>Determine internal process for booking meetings (e.g., consistent day of the week) and assigning staff for review</li> <li>Establish a pre-application fee, and consider a fee credit to those who proceed with an application within specific time frame (e.g., six months)</li> <li>Incorporate process into <i>Development Procedures Bylaw</i></li> </ul>	
<b>Intake and Assignment Process</b>	
<ul style="list-style-type: none"> <li>Ensure administrative staff are trained to determine completeness of application, calculate associated application fees and conduct submission review meetings with applicants</li> <li>Develop online option to calculate and pay application fees</li> <li>Book submission review meetings in cases where pre-application meeting not warranted</li> <li>After a complete application is submitted, have files created and assigned to a File Manager within two weeks</li> <li>Place responsibility for assigning files with Manager of Planning; Manager is not required to review file for completeness prior to assigning File Manager</li> </ul>	

Recommended Action — Process	Priority
<b>Development Application Review Team</b>	
<ul style="list-style-type: none"> <li>Establish a Development Application Review Team (DART) with structured bi-weekly meetings to provide a forum for reviewing, collaborating and making decisions on applications with conflicting inter-departmental referral comments and/or requests</li> <li>Develop a risk-based referral framework to ensure DART is used to review significant applications; focus discussions on points of conflict ambiguity</li> <li>Support DART with a formal agenda and advance notification of meetings to enable review and comment</li> </ul>	
<b>Referral Protocols</b>	
<ul style="list-style-type: none"> <li>Establish DART meetings as the last stop for referrals</li> <li>Establish referral protocol/frameworks with other departments to minimize “blanket referrals” and to limit feedback on applications to those that have may have a significant impact on the community or department</li> </ul>	
<b>Housing First/Streaming</b>	
<ul style="list-style-type: none"> <li>Identify criteria to expedite and give priority service to affordable housing projects (consistent with the recently-adopted Affordable Housing Policy)</li> <li>Establish an application stream to provide enhanced level of support (with an associated fee) to non-developer applicants</li> </ul>	
<b>Delegation of Authority</b>	
<ul style="list-style-type: none"> <li>Continue to monitor the number and scope of development permits with minor variances approved by the Director of Planning and Building to ensure the provisions capture the majority of development and development variance permits</li> </ul>	

Recommended Actions — Communication	Priority
<b>Application Forms, Guides and Checklists</b>	
<ul style="list-style-type: none"> <li>After processes are established, update and post application guides</li> <li>Create checklists, including one that is a product of pre-application meetings (that then must be included in applications)</li> <li>Provide samples of required plans and documents, and templates for supporting professional report format and content</li> </ul>	
<b>Update Bylaws</b>	
<ul style="list-style-type: none"> <li>Update the Subdivision Control Bylaw</li> <li>Update other bylaws (Development Procedures) to reflect processes</li> </ul>	

Recommended Actions — Communication	Priority
<b>Application Tracking</b>	
<ul style="list-style-type: none"> <li>• Enable applicants to view where their applications are in the process</li> <li>• Publish average timelines required for applications to reach key review milestones to provide predictability for applicants</li> </ul>	
<b>Target Timelines</b>	
<ul style="list-style-type: none"> <li>• Create, publish and report annually on progress toward timeline targets for milestones in the development approval process</li> </ul>	
<b>Development Liaison Group</b>	
<ul style="list-style-type: none"> <li>• Create Development Liaison Group as a forum to discuss development issues, municipal regulations and upcoming changes</li> </ul>	

Recommended Actions — Technology	Priority
<b>Technology</b>	
<ul style="list-style-type: none"> <li>• Complete assessment of technology platforms and, based on assessment outcomes, invest in technology to increase functionality of task management, data collection, digital tracking, review and reporting capabilities</li> <li>• Include in investment:               <ul style="list-style-type: none"> <li>– an online portal to facilitate digital submissions</li> <li>– an application monitoring dashboard that allows applicants to track where applications are in the process</li> <li>– a "Live Counter" on the website to show how many applications the planning department is currently processing</li> <li>– shared access to digital application files and referral comments</li> </ul> </li> </ul>	

Recommended Actions — Structure and Resources	Priority
<b>Organizational Structure</b>	
<ul style="list-style-type: none"> <li>• Restructure to combine development-related groups in the Planning and Building Department</li> <li>• Move development engineering into the Engineering Department</li> </ul>	

Recommended Actions — Structure and Resources	Priority
<b>Organizational Structure</b>	
<ul style="list-style-type: none"> <li>Address gap in lands management to provide knowledge and guidance on property acquisitions, leasing, easements, and management of civic land, to support the implementation of municipal capital projects</li> </ul>	<div style="background-color: green; width: 100%; height: 100%;"></div>
<b>Staff Resources</b>	
<ul style="list-style-type: none"> <li>Provide one additional full-time administrative support to Planning and Building</li> </ul>	<div style="background-color: green; width: 100%; height: 100%;"></div>

## LESSONS LEARNED

It is acknowledged that the MNC will need to consider development approval process recommendations in context with other municipal priorities to determine an implementation plan. The following observations are intended as guidance and lessons learned from other communities with respect to the key action areas:

- Development and refinement of documented processes will require dedicated time. In some municipalities, a multi-departmental team has been created and charged with responsibility for overseeing this process.
- External communication materials — guides, website information, dashboards — will require graphic design resources to create a consistent design, and to ensure the information is easily accessible and digestible by residents in addition to more experienced applicants.
- Technology solutions and upgrades need to consider the entire organization. Some municipalities have a technology working group that involves representatives from different departments to identify needs and find coordinated solutions to technology challenges, and ensure the municipality's systems are meeting departmental and organization needs, and that each department is leveraging the use of the existing system.
- Structural changes can disrupt typical workflows but also offer an opportunity to innovate how intra- and inter-departmental communication and collaboration occurs. There is an opportunity to implement structural changes prior to the process mapping exercise to ensure that the resulting collaborative review process is aligned with the new structure.

## APPENDIX I SAMPLE PROCESS CHARTS

DEVELOPMENT  
SERVICES FUNCTION  
REVIEW

REPORT

**NEILSON**  
STRATEGIES

leftside partners inc.

DECEMBER 2025

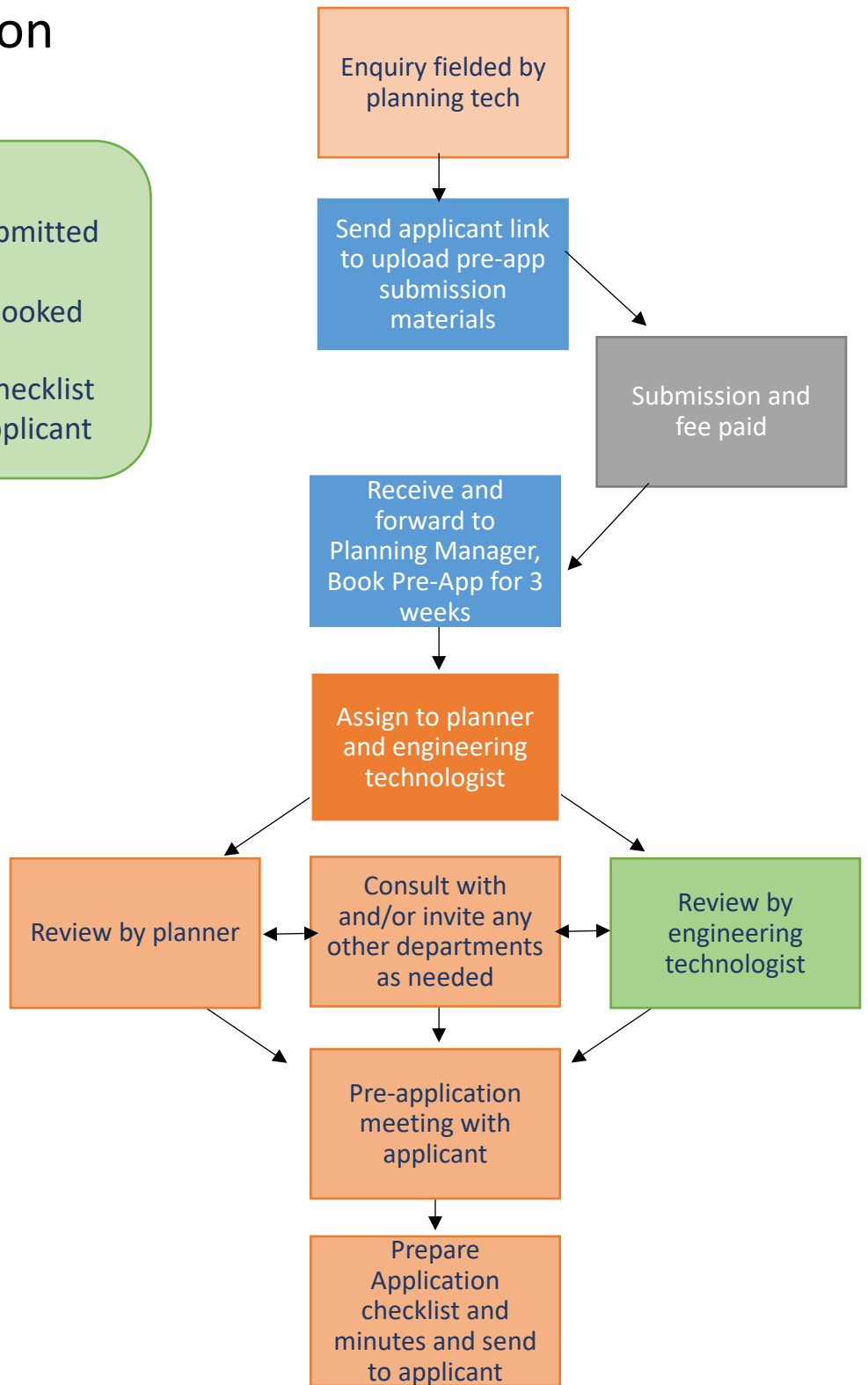
# Pre-Application Process

## Milestones

- Application submitted and fee paid
- Pre-app date booked
- Meeting held
- Minutes and checklist shared with applicant

3 weeks

2 weeks



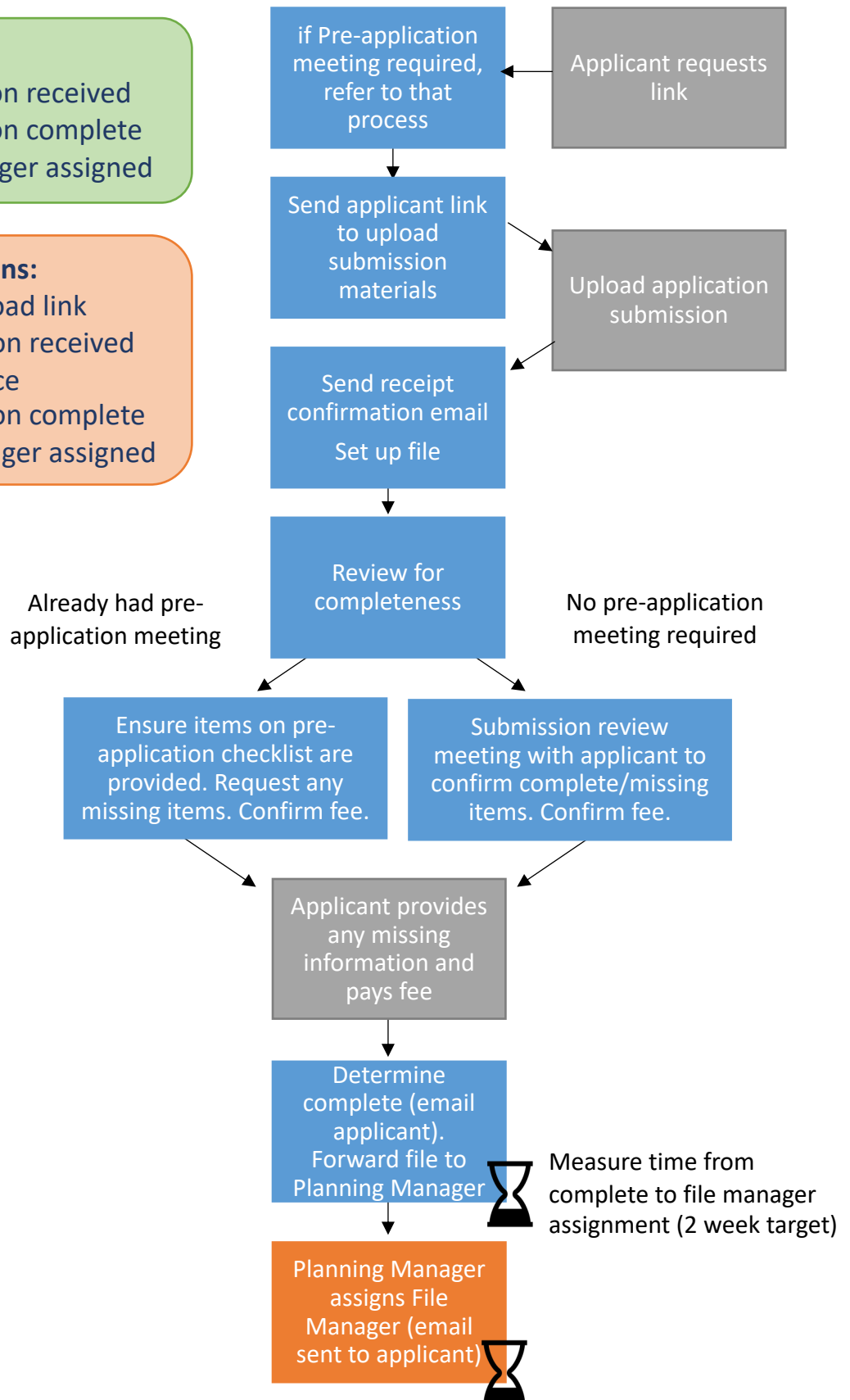
# Intake Process

## Milestones:

- Application received
- Application complete
- File manager assigned

## Communications:

- Send upload link
- Application received
- Fee invoice
- Application complete
- File manager assigned



# DART Process

## Milestones:

- File Manager assigned
- DART meeting (if required)
- Summary Letter provided

## Communications:

- Summary Review Letter

