

ATTACHMENT A



BUILDING PERMIT FUNCTION REVIEW

DRAFT REPORT

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**BUILDING PERMIT
FUNCTION REVIEW**

DRAFT REPORT

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STRATEGIES

CHAPTER 1 INTRODUCTION

Property owners in the City of Nanaimo who wish to construct a new building, alter or improve an existing building, change use or occupancy, demolish a structure, install a swimming pool, build a major deck or retaining wall, add a garage, or undertake some other type of construction must first apply for and obtain a City building permit. Applications are processed, proposed projects are reviewed and building permits are issued through the City's building permit function.

Strong development in Nanaimo has resulted in a high and sustained demand for building permits. Staff in the Building Inspections Section of the City's Development Services Department endeavour to process applications and issue permits in a timely fashion. Recent application volumes, however, have tested the ability of the Section in its current form, and using its current systems, to consistently meet its own expectations as well as those of Council and the development industry. To better understand the Section's existing challenges, and to identify changes to consider, the City determined to review its building permit function. Neilson Strategies Inc., a BC-based local government consultancy, was selected as the independent consultant to conduct the review.

BUILDING PERMIT FUNCTION REVIEW

Objectives

The review was guided by a number of objectives, all of which were developed by the City with input from the consultant. Five specific objectives stood out as being particularly important:

- *Reduce Permit Processing Times* — The review was driven by the desire, expressed by the development community and shared by the City, to reduce the time required to review building permit applications and issue building permits.
- *Limit the City's Liability* — Municipalities such as Nanaimo that choose to exercise their authority to regulate buildings through the issuance of building permits automatically incur a certain amount of risk for which they may be held liable. The challenge facing all cities, including Nanaimo, is to create a permit system that limits liability to taxpayers, while at the same time achieving reasonable processing times, and ensuring the development of a built environment that is safe, attractive, high in quality and affordable.
- *Engage Industry in Developing Solutions* — The City and the development industry play different roles and have different responsibilities in the development process. Both parties, however, share a common interest in creating an environment for affordable, safe, quality development to occur.

The review of the building permit function represented an opportunity both to hear the concerns and tap into the ideas of builders, developers, development professionals and others who rely on the City for building permits.

- *Engage Staff* — Staff involved in the building permit function have a good understanding of the function, and have useful ideas for streamlining the permit process and achieving other improvements. The need to engage staff at all levels in discussion was one of the review's guiding objectives.
- *Pursue Cost Neutrality* — In Nanaimo, as in most high-growth centres, revenues raised by the City from building permits are sufficient to offset the cost of the municipality's building permit function (not including administrative overhead) in years with high building activity. There are different philosophies in the municipal field on cost-recovery expectations related to building permit functions, given the presence of both public good and private good characteristics in the issuance of building permits. Philosophical differences aside, however, the City of Nanaimo, similar to many municipalities, has come to rely on a high degree of cost-recovery in its building permit function. Cost increases that would result from changes identified through the review of the function should, therefore, be balanced as much as possible by offsetting revenue increases in order to maintain the function's level of cost-recovery.

Consultant's Approach

The consultant's approach to conducting the review relied heavily on interviews with City staff, individuals and groups from Nanaimo's development industry, and building officials in other jurisdictions. Over a ten-week period the consultant met with:¹

- approximately 25 City of Nanaimo Building Officials (Plan Reviewers and Building Inspectors), support staff, managers and others involved in the building permit function
- over 20 builders, developers, architects, engineers, consultants and others from Nanaimo's development industry (including some who are active in Nanaimo but based outside of the region)
- three separate focus groups convened by the Mid-Island Business Initiative, the Nanaimo Development Group and the Vancouver Island Construction Association
- Building Officials active in, or with recent experience in, a range of municipalities in British Columbia and Ontario
- staff from the Municipal Insurance Association of British Columbia

¹ The ten-week period occurred over three months from late October, 2020, to early February, 2021. During these months, a personal health issue caused a delay to the project.

Taken together, the interviews helped to identify a range of issues and perspectives concerning the City's function. Interviewees also outlined a number of ideas and initiatives aimed at improving permit processing times or some other element of the function.

In addition to the interviews, research on the City's permit process, building function practices, *Building Bylaw* and a range of other items was a key feature of the approach, as was research on materials and initiatives in other jurisdictions, both within and outside of British Columbia.

DRAFT REPORT

This *Draft Report* presents the consultant's findings on and recommended changes to the City's building permit function. The report begins by profiling the City's function as it exists today, including the function's legislative basis, staffing model, permit application review process, volume and value of permits, cost-recovery and other items. Issues in need of attention are introduced and explained next under the following four categories:

- the process through which permit applications are reviewed and permits are issued
- the Building Inspections Section that is responsible for the function
- the City's use of technology in the function
- relationships between the Building Inspections Section and Nanaimo's development industry

Recommended changes for the City to consider to address the main issues are presented and outlined in detail in the report's final chapter.

The *Draft Report* is scheduled for presentation to City Council's Governance & Priorities Committee on March 22, 2021. Input provided by Committee will be incorporated where possible into a *Final Report* for submission to the City by the end of March, 2021.

CHAPTER 2

CURRENT BUILDING PERMIT FUNCTION

This chapter profiles the City of Nanaimo's building permit function as it exists today. The function's purpose and legislative framework are addressed first. The Building Inspections Section in the City's Development Services Department is then reviewed. This Section has primary responsibility for the function. The efforts of the Section to inform applicants are outlined next, followed by the process that staff in the Section currently follow to issue building permits. The Section's file management software, permit volumes and construction values, annual revenues and expenses, and average application processing times are also outlined.

PURPOSE OF THE FUNCTION

As noted earlier, property owners in the City of Nanaimo who wish to construct a new building, alter or improve an existing building, change use or occupancy, demolish a structure, or undertake some other type of construction must first apply for and obtain a City building permit. Applications are processed, proposed projects are reviewed, and building permits are issued, through the City's building permit function.

The function exists, first and foremost, to protect the safety of persons who occupy, use and gather in buildings by ensuring that all structures, on both public and private lands, meet the minimum construction standards set out in the *BC Building Code*, *BC Plumbing Code* and related documents. The function exists, as well, to protect the community's land use planning goals as expressed primarily in the City's *Zoning Bylaw*. All applications for building permits are reviewed through the permit function to ensure compliance with the construction standards in the codes and the land use regulations in the zoning bylaw.

LEGISLATIVE FRAMEWORK

The legislative framework for the building permit function consists of provincial statutes and codes, and municipal bylaws. 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.² 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 plan reviewers and building inspectors with the qualifications necessary to review building plans and monitor

² The *Act* applies in all parts of BC with the exception of the City of Vancouver, federal lands and First Nation reserves.

construction for compliance to technical building requirements. Under the *Act*, building officials may be qualified to Level I, Level II or Level III. Each successive level requires a higher degree of expertise and a greater amount of work experience, and allows an individual to review and monitor increasingly complex buildings.³

The *Building Act* sets out a provision on "alternative solutions" to allow applicants to propose innovative, alternative ways to meet *Building Code* requirements. Local governments decide whether to approve proposed alternative solutions that come forward.

- *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 structures. *Code* requirements apply, as well, to alterations and additions made to existing buildings, and to propose changes in the use of buildings.

The requirements in the *Building Code* address concerns related to health and safety, and to fire and structural protection. Needs and goals related to accessibility, as well as energy and water efficiency, are also addressed in the *Code*. Builders comply with the *Building Code* by following the requirements as prescribed in the *Code* or by proposing an alternative solution (noted earlier) that achieves the same outcome.

- *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.⁴ The requirements are designed to protect health, but also to prevent water and sewer system damage.
- *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*.

³ Changes to the *Building Act* affecting the qualification of building officials took effect at the end of February, 2021. The changes, which have important implications for all municipalities, are explained later in the text.

⁴ 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 *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.
- *City of Nanaimo Building Bylaw 2016, No. 7224* — The City's *Building Bylaw* is the bylaw through which Nanaimo Council exercises its authority to regulate the design, construction and occupancy of new buildings and structures, and the alteration, demolition, relocation and use of existing buildings and structures. The *Building Bylaw* sets out the requirement to apply for and obtain a building permit prior to beginning construction of a new building in Nanaimo, or alteration of an existing building. In addition, the *Bylaw* outlines:
 - the conditions under which permits are issued, including the responsibility of owners who receive permits to ensure compliance of their building projects with the *Building Code*, the *Building Bylaw* and other safety-related enactments
 - the role and powers of the City's building officials
 - requirements that relate specifically to applications for complex buildings, as well as requirements for applications related to standard buildings⁵
 - the City's reliance on assurances from registered professionals that the building design and plans in an application for permit comply with the *Building Code*
 - responsibilities placed on the owner
 - the authority of building officials to monitor site field reviews undertaken on complex buildings over the course of construction
 - the authority of building officials to conduct inspections of standard buildings over the course of construction
 - the requirement to obtain a Certificate of Occupancy prior to occupying a building, or part of a building as the case may be
 - the City's phased introduction of the *BC Energy Step Code*, and the requirements of owners under the *Step Code*
 - penalties and enforcement
 - a variety of other items

Nanaimo's *Building Bylaw*, similar to that of several other municipalities, is modelled after a 2002 core building bylaw created by the Municipal Insurance Association of BC (MIABC) to help municipalities manage risk and

⁵ Complex buildings include multi-family residential buildings above a certain size, along with most commercial, industrial and institutional buildings. Complex buildings are regulated under Part 3 of the *Building Code*. Standard buildings are single family residences and small non-residential buildings. They are regulated under Part 9 of the *Code*.

limit their exposure to liability related to the regulation of construction. MIABC's core bylaw provides municipalities the ability, where deemed prudent, to place the onus of ensuring compliance with *Building Code* requirements for complex buildings on the Coordinating Registered Professional listed on the application.

BUILDING INSPECTIONS SECTION

Nanaimo's building permit function is administered by the Building Inspections Section within the Development Approvals Division of the City's Development Services Department. Figure 2.1 on the following page presents an organization chart for the Section. As illustrated in the chart, the Section is divided into two main groups:

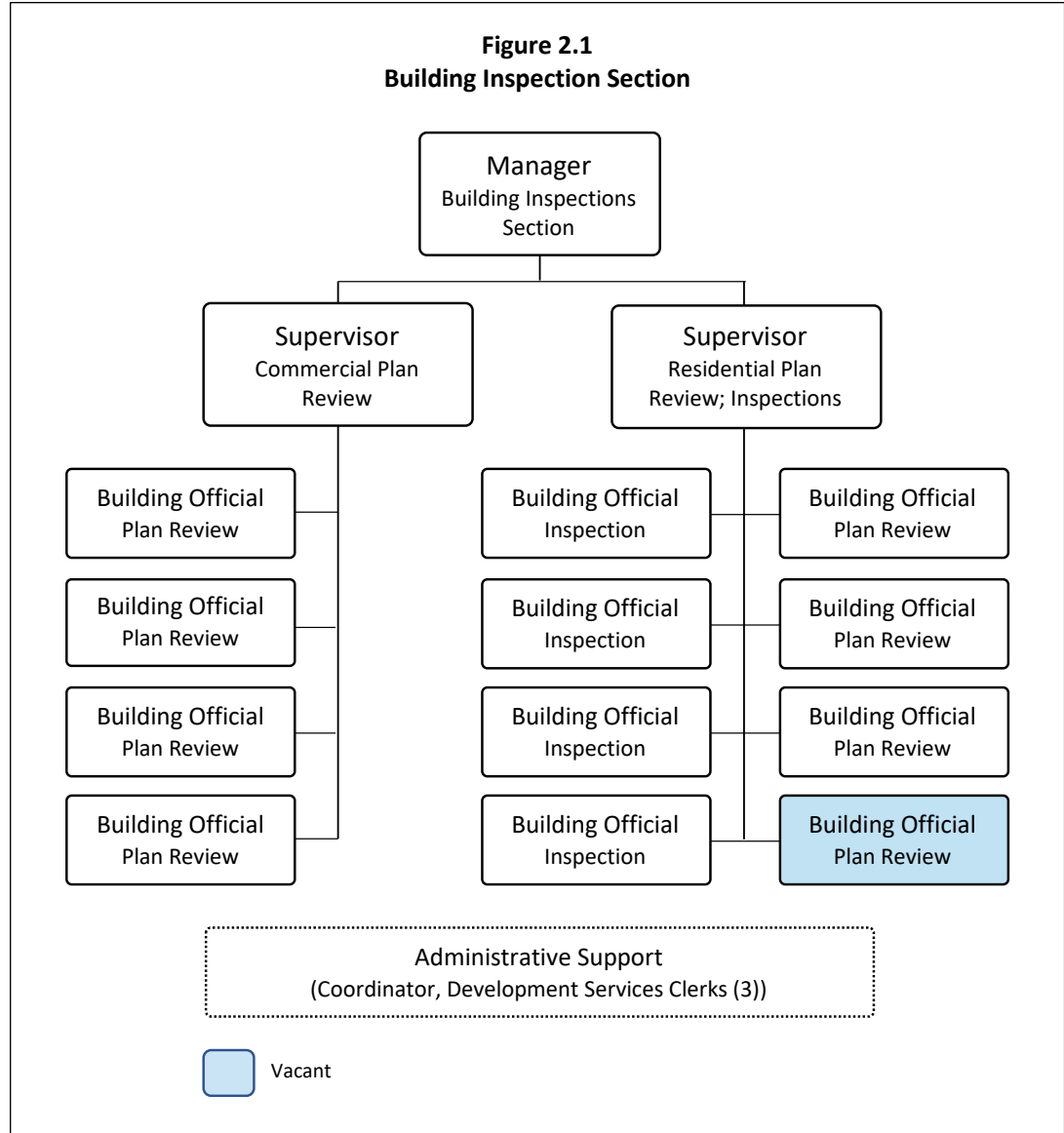
- *Residential* — The residential group is headed by a Supervisor who is responsible for eight (8) full-time Building Officials. Four (4) of the Building Officials are Plan Reviewers (one position is vacant at the time of writing) dedicated to the review of single family residential building permit applications and others that fall under Part 9 of the *Building Code*. The remaining four (4) are the City's Building Inspectors, all of whom monitor and inspect buildings during key stages of construction.
- *Commercial* — The commercial group is headed by a Supervisor who is responsible for four (4) full-time Building Officials, all of whom work as Plan Reviewers on permit applications for complex (Part 3) buildings, including multi-family residential, commercial, industrial and institutional projects.

The Building Inspections Section relies on a support group of staff that provides assistance to the broader Development Services Department. Included in this support group is the Permit Centre with staff whose main responsibility involves receiving building permit applications and preparing them for preliminary review by one of the Section's Plan Reviewers. Other administrative support staff provide support to the Section as required, but report and belong to other parts of the Development Services Department.

INFORMATION TO APPLICANTS

The review of building permit applications to ensure compliance with the *Building Code* and other important documents is a highly technical function in local government, particularly in centres such as Nanaimo that receive a wide variety of permit applications. An important role for the Section is to ensure that applicants and prospective applicants understand the submission requirements and permit process, and are made aware of *Building Code* changes and other building-related matters. To help fulfil this role, the Section provides a considerable amount of information in various formats through the City's website. A list of such materials includes:

**Figure 2.1
Building Inspection Section**



- written introductions to and explanations of the types of residential building permits that are required (e.g., new home construction, accessory building, secondary suite, swimming pool, etc.)
- videos to help applicants for residential building permits understand the permit process and the City's requirements
- up-to-date guides, complete with checklists, to assist applicants for residential permits
- additional guides, forms and requirement sheets to outline expectations related to specific types of residential construction, such as secondary suites, accessory buildings, carriage houses and others
- a *Commercial/Multi-Residential/Industrial — Detailed Guide to Building Permit Applications*

- checklists and application documents for Part 3 commercial applications and less complex Part 9 commercial applications
- permit application checklists for tenant improvements and other specific types of commercial projects
- instructions and links for the City's online building permit application process
- information and links on the BC Energy Step Code, as well as other items presented under "Building News and Alerts"
- general information on expected permit wait times
- a building permit fee calculator
- guidance on submitting revisions both to residential and commercial permits
- links to relevant City bylaws, including the *Building Bylaw*, *Business Licence Bylaw*, *Development Cost Charge Bylaws*, *Zoning Bylaw*, *Management and Protection of Trees Bylaw* and others

These documents and others are written to benefit applicants and prospective applicants. To the extent that the materials enable applicants to submit complete applications, however, key beneficiaries of the materials are the City's Plan Reviewers who aim to process applications efficiently. Indeed, all applicants benefit when individuals understand how to submit proper applications that do not cause delays for staff.

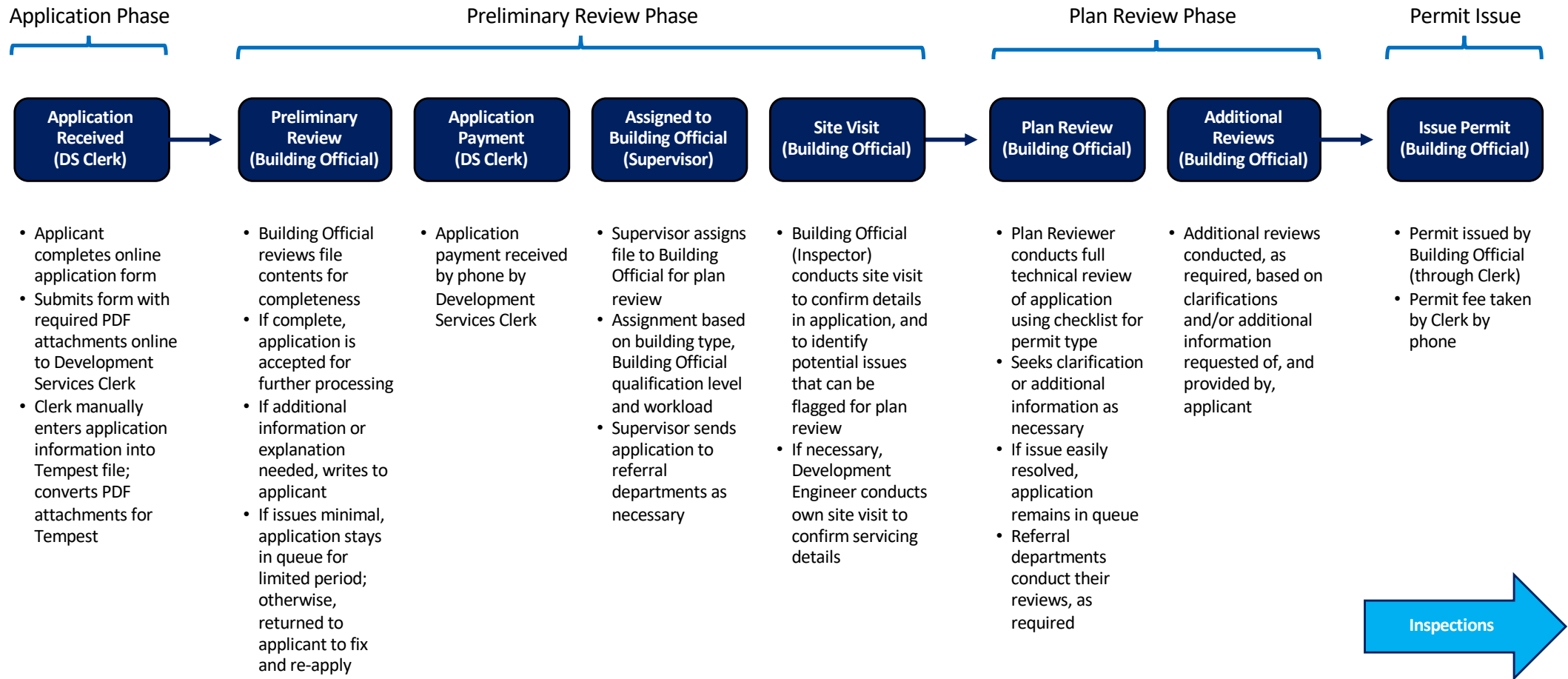
BUILDING PERMIT PROCESS

Figure 2.2 presents a simplified chart of the City's building permit application review process.⁶ For the purpose of presentation, the process has been divided into four phases:

- *Application Phase* — In this first phase, the applicant submits the building permit application form and list of necessary attachments (based on type of project) to the Development Services Clerks. Prior to the introduction of COVID-19 in March, 2020, all applications were submitted in person at the Permit Centre front counter. To address COVID-19 concerns, the City developed an online submission system to receive all permit applications electronically.
- *Preliminary Review Phase* — This phase begins with a preliminary review of the application file by a Building Official simply to ensure application completeness. In cases where applications are not complete, the Official emails the applicant with a list of information required. Most applications are held in the queue for 30 days while applicants attend to missing materials.

⁶ Concerns with and potential changes to the process are identified in subsequent chapters of the report.

**Figure 2.2
Building Permit Application Review Process**



During this phase, the Supervisor responsible for the particular permit type (i.e., Single Family Residential or MFR/Comm/Industrial) assigns the application file to a Plan Reviewer, and refers the application electronically to relevant City departments for review of key aspects. A Building Inspector conducts a site visit to confirm details in the application, and to identify any potential issues that require particular attention during plan review.

- *Plan Review Phase* — The detailed technical review of the application occurs at this phase of the process. In some cases, details in the package will need to be discussed with the applicant; in other cases, additional items may be required. Discussions and clarifications with applicants occur as necessary.
- *Permit Issue Phase* — The building permit is issued and paid for to end the building permit application review process. Construction and inspections begin after the permit has been issued.

TECHNOLOGY

The Building Inspections Section — indeed, the entire Development Services Department — uses the Tempest Prospero software platform to manage permit application files. Tempest allows the Section to manage the flow of files through the various permit processing phases, including the sending of referrals to other departments in the Preliminary Review Phase. Through its MyCity function, Tempest also allows applicants to see in broad terms the progress of an application through the review process.

At present, Tempest does not allow applicants to submit online applications directly into the system. At the outset of COVID-19, the City moved quickly to create an online fillable-PDF application for applicants to use in place of a paper form. The form and all PDF attachments can be uploaded by the applicant into a DocuSign folder for transfer to the City. Development Services Clerks take the information from the DocuSign folder and manually place it into a Tempest folder. Tempest is also not set up to receive electronic credit card payments. At present, therefore, staff must take information by phone and process it separately.

Tempest is supported by the City's Financial Systems and Reporting Section of the Information Technology Department. The City has been informed by CentralSquare, the firm that recently bought Tempest, that the platform will be transitioning to a web-based system in the coming years. CentralSquare has told the City that its current platform will continue to be supported.

VOLUMES AND VALUES

Figure 2.3 presents data on the number of all types of building permits issued by the City over the five year period from 2016 through 2020. The construction value of

**Figure 2.3
City of Nanaimo Building Permit Volumes and Values
2016 to 2020**

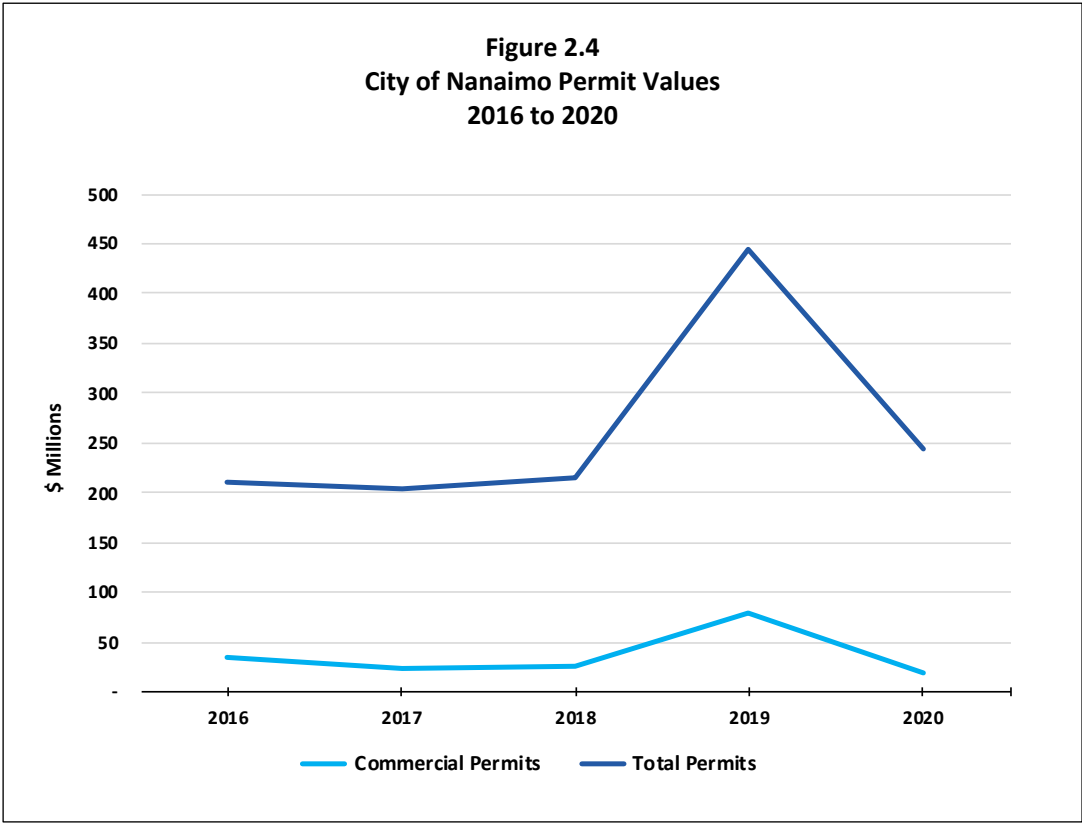
Permit Categories	2016	2017	2018	2019	2020
Residential Permits					
Single-Family New*	350	319	275	224	236
Multi-Family New	65	47	58	62	25
Secondary Suite	142	91	79	84	71
Alteration	218	249	209	218	196
Total Permits	775	706	621	588	528
Total Value	158,664,364	161,699,321	186,135,742	340,010,849	203,820,319
Commercial					
Total Permits	120	120	126	145	103
Total Value	35,998,397	24,462,281	26,211,316	80,362,764	18,368,455
Industrial					
Total Permits	13	16	7	11	6
Total Value	5,388,420	6,575,188	1,249,711	10,078,075	6,030,834
Institutional					
Total Permits	12	10	7	10	8
Total Value	10,510,117	10,538,674	1,462,625	13,868,698	13,114,826
Uncategorized					
Total Permits	-	2	1	-	-
Total Value	-	105,206	-	-	-
Miscellaneous					
Demolition	48	56	47	51	32
Sign	53	47	40	51	38
Retaining Wall	23	19	12	16	10
Other	81	74	66	73	65
Total Permits	205	196	165	191	145
Total Value	783,856	745,821	966,693	1,065,282	1,815,668
Total Number of Permits	1,125	1,050	927	945	790
Total Value of Permits	211,345,154	204,126,491	216,026,087	445,385,668	243,150,102

* Includes single-unit dwellings, two-unit dwellings, mobile home units

the projects that received the permits is also identified in the figure. Permits and values are broken out by permit category for each year. The data show that 2019 was a particularly significant year in terms of permit values across all permit types. The dip in 2020 back to pre-2019 levels is attributable to a temporary decline in permit applications attributable to COVID-19 during the first half of 2020.⁷ Figure

⁷ Staff note that some significant commercial permits were issued in late 2020 but not collected by applicants until the first weeks of 2021 (and thus recorded in 2021 totals). If those permits had been collected when available in late 2021, the 2020 total value would have exceeded \$300 million.

2.4 shows graphically the permit values for commercial permits and total permits combined (including commercial).



REVENUES AND EXPENSES

As noted earlier in the report, municipalities in high-growth areas typically recover — indeed, expect to recover — the full cost of their building permit functions, net of corporate overhead, from building permit fees. Figure 2.5 shows the revenues earned by and expenses incurred by the Nanaimo's Building Inspection Section cost centre. All costs other than full corporate overhead charges are included. The drop in net revenue 2020 can be explained by the temporary decline in permit applications, attributable to COVID-19, early in the first half of 2020.⁸

⁸ City records show that 70% of the total 2020 building permit values occurred in the second half of 2020. In previous years the value of building permits was highest in the six months.

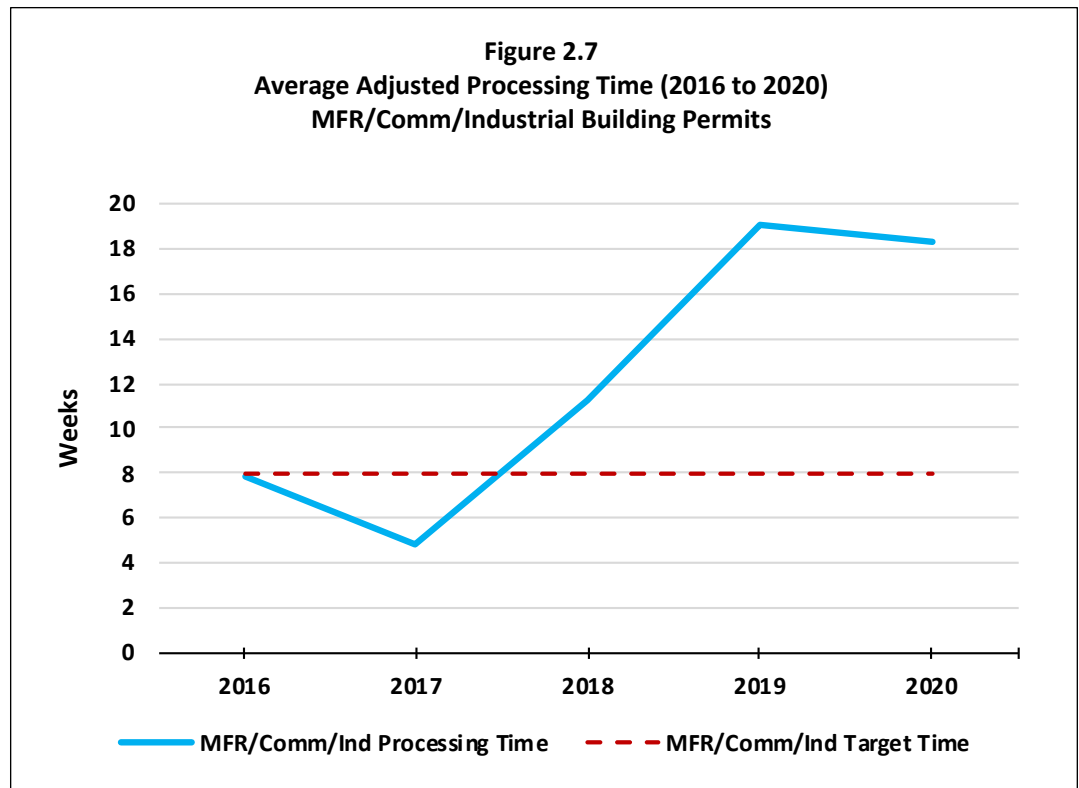
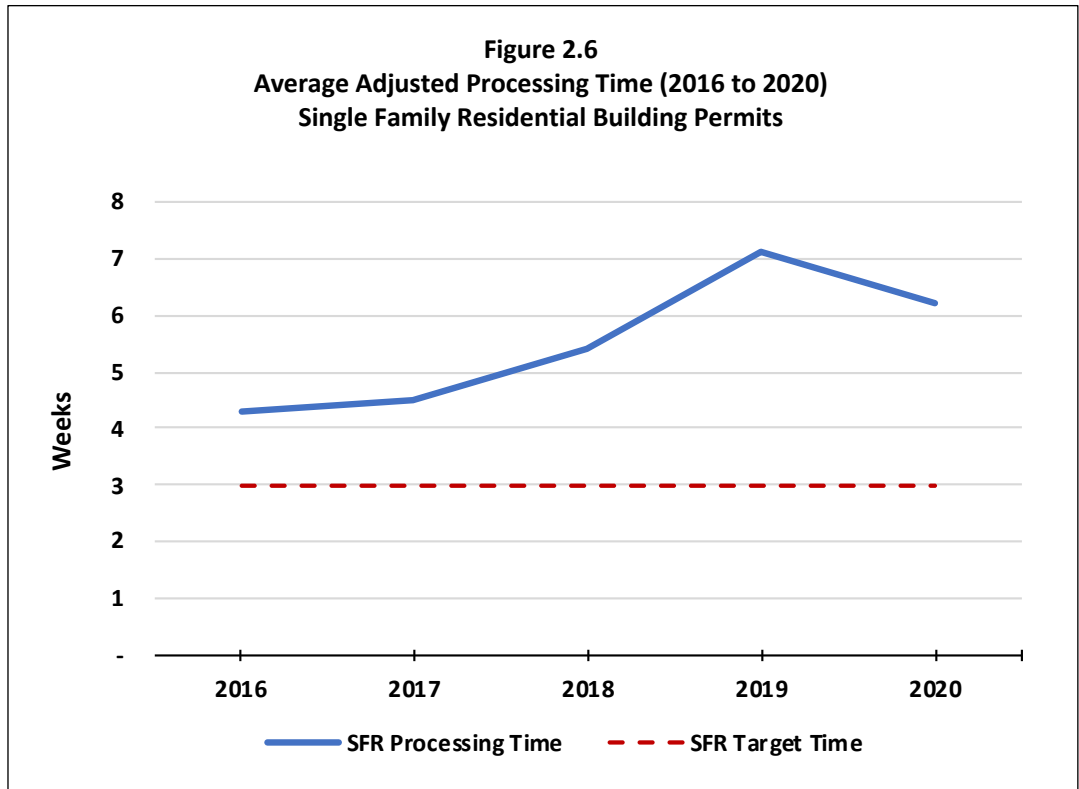
**Figure 2.5
Revenues and Expenses (2019-2020)
Building Inspection Function Cost Centre**

CATEGORY	2019	2020
Revenues		
Building Permits	2,062,637	1,790,008
Other Permits	243,792	173,531
Document & Publication Sales	13,300	6,727
Miscellaneous & Recoveries	4,604	10,906
Total Revenues	2,324,333	1,981,172
Expenses		
Labour		
Management Wages	121,711	123,881
Regular Wages	1,006,716	1,107,499
Temporary Employee Wages	85,297	74,168
Overtime Wages	119,709	108,104
Benefits	310,535	321,344
Auxiliary Labour Allocations	37,548	8,540
Sub-total Labour	1,681,516	1,743,536
Other		
Contracted & Other Services	7,552	14,910
Telephone	4,583	4,276
Employment Expenses	51,581	46,693
Materials & Supplies	(2,090)	2,864
Monthly Fleet Charge	-	849
Network Charges	27,800	25,977
Computers, Software & Equipment	23,377	23,355
Sub-total Other	112,803	118,924
Total Expenses	1,794,319	1,862,460
NET REVENUE	530,014	118,712

APPLICATION PROCESSING TIMES

Figure 2.6 presents the average processing times for single family residential permits for the years 2016 to 2020, compared to the City's target processing time of three (3) weeks. Figure 2.7 presents the same information for Multi-Family, Commercial and Industrial permits, with the City's target time of eight (8) weeks. In both cases, the average processing time figures have been adjusted to remove delays

attributable to applicants who have been asked for additional documents to complete their applications or address deficiencies.



CHAPTER 3

ISSUES TO CONSIDER

As noted in the introduction to the report, several City staff involved in the building permit function were interviewed over the course of the study, as was a broad range and significant number of builders, developers, professionals and others who rely on the City for building permits. Data and other information items on the City's function were also examined. Based on the interviews and the review of materials, the consultant identified specific issues that the City may wish to consider in its efforts to reduce permit wait times and improve the function in other ways. These issues are set out and explained in this chapter of the report.

The issues are presented under the following categories:

- the process through which permit applications are reviewed and permits are issued
- the Building Inspections Section that is responsible for the function
- the City's use of technology
- relationships between the Building Inspections Section and Nanaimo's development industry

The issues set out in this chapter do not represent the definitive list of concerns raised by staff and stakeholders. The chapter does present, however, the points that, in the consultant's judgement, are the most important for the City to address.

NATURE OF REVIEWS

Reviews of municipal functions are, by their very nature, critiques that set out to identify issues to address and problems to fix. Such reviews do not tend to focus on the many positive attributes and accomplishments that exist in almost every organization. It can be useful, prior to examining the issues, to highlight some of these attributes and accomplishments. In the case of Nanaimo's Building Inspections Section there are many, including the following examples:

- *Respect for Staff* — Builders, developers, professionals and others interviewed for the study indicated a high degree of respect for staff at all levels in the organization. Staff who were interviewed also spoke highly of their colleagues. Issues raised by both groups of interviewees highlight concerns with processes, systems and resource levels, not with the people working at the City.
- *COVID-19 Pivot* — Staff in the Section deserve accolades for having quickly adjusted to the reality of the COVID-19 pandemic in March, 2020, by designing, implementing and learning to work within an online permit application system. While the system is not without its issues (see later

under Technology) it has served an important purpose and has helped to minimize the disruption to applicants.

- *Procedures on Revisions* — Staff have collaborated with members of the Nanaimo Development Group to develop draft procedures to efficiently deal with revisions to active building permits for complex buildings.⁹ Once implemented, these procedures will benefit both applicants and staff.
- *Online Materials* — The Section has created a broad range of user-friendly guides, forms, checklists, reference materials, videos and other information pieces that applicants and prospective applicants can access online at nanaimo.ca. The range and quality of the materials are impressive and representative of a municipal best practice.

These accomplishments are indicative of the Section's strengths on which the review can build.

APPLICATION REVIEW PROCESS

Limited Streams

Building permit applications submitted to the City are separated at the time of submission into two main process streams:

- *Residential* — Applications for new single family residences, duplexes, accessory buildings, and single family residential renovations/alterations are placed into this stream, along with applications for a variety of other non-complex structures such as carriage houses, secondary suites, fences and retaining walls, and swimming pools.
- *Commercial* — Applications for most multi-family residential developments, commercial buildings, industrial projects and other complex structures are placed into this stream.

Following preliminary plan review, during which applications are checked to ensure completeness, the applications in each stream are assigned to Plan Reviewers based on workload and, in the case of the commercial stream, type of project (e.g., multi-family residential, major commercial, commercial alterations). Within each of these sub-streams, the applications are reviewed on a first-in/first-out basis. Applications within the streams and sub-streams are not differentiated or processed separately on the basis of:

- level of risk
- applicant qualifications and assurances of *Code* compliance

⁹ The Nanaimo Development Group (NDG) is an industry body comprised of builders, developers and development professionals active in Nanaimo, and interested in helping to improve the City's development approval processes, including the process for building permit applications.

- applicant track record with the City
- level of permit fees charged
- development priorities (e.g., net zero homes, passive homes, affordable housing, innovative tenures) that could be identified by Council
- other criteria

An increasing number of municipalities in high-growth regions of the province and outside of British Columbia are experimenting with or have created new streams based on various criteria to "fast track" building permits for targeted projects. The City of Penticton, for example, has in place a "Residential Xpress" fast track building permit process for a range of low-risk, simple projects including:

- exterior decks
- interior renovations (other than secondary suites)
- plumbing, mechanical and wood stoves
- detached buildings (other than carriage houses)
- landscaping and swimming pools

Builders who are in good standing with the City and who regularly attend the City's building education workshops, can apply to the fast track process and receive permits within one to 14 days. The City of Kelowna has had a similar process in place for several years which applicants can use to obtain permits within two to three days. The District of Central Saanich offers a "5-Day Fast Track" process for new single family homes. The City of Vancouver recently piloted — and is now reviewing — an "Applicant Supported and Assisted Process (ASAP)" that created a fast track to significantly reduce permit processing times for single-family and laneway homes.¹⁰ Qualified and experienced homebuilders with strong track records at the City were invited to participate in the program.

On the commercial side, the City of Coquitlam offers a fast track process for simple tenant improvement permit applications that do not require referrals to other departments (e.g., development engineering), and do not involve changes to plumbing. Applications that are complete and without deficiencies can be processed through this fast track in two days (compared to greater than one month for standard tenant improvement permits). The City of Barrie, ON, has a Commercial FAST TRACK process for tenant improvement permit applications for certain types of businesses, with alterations designed by an architect or engineer. Permits are provided within ten days through the fast track — half the standard time required.

These examples from other centres demonstrate that municipalities can (and do) create different streams to expedite the processing of different types of building permits. The examples reflect the fact that not all permit applications, even within a given building type, are the same in terms of complexity, applicant experience,

¹⁰ Vancouver's project reduced permit wait times from 28-38 weeks to 6-8 weeks.

location and other factors. Applications that are low in risk relative to others, or that meet other criteria set the municipality, can be processed quickly through a separate stream. The applicants who are able to make use of the fast track streams benefit from the special treatment given to their applications. Applicants who are required to use the regular processing streams also benefit from the fast tracks, however, simply because the initiatives serve to reduce the volume of applications that would otherwise be moving through a single standard queue. In some instances, the reduction in volume is significant. Municipalities such as Kelowna and Penticton that direct low-risk residential applications to fast tracks reduce the overall volume of residential permits that would otherwise be processed through a single stream by up to 50%. Figures are not available for Barrie or Coquitlam; however, staff estimate that the percentage of tenant improvement applications diverted is also considerable.

Staff and development industry stakeholders interviewed in Nanaimo believe that there is merit to considering fast track streams for low risk residential and tenant improvement permit applications.

Incomplete Applications

It is a standard practice across jurisdictions for local governments to require building permit applicants to submit complete application packages. Similarly, it is standard practice for building departments to either reject incomplete applications outright, or to put incomplete applications on hold pending the submission of missing elements.

Staff in Nanaimo note that the majority of building permit applications, both residential and commercial, are not complete at the time of submission. Nanaimo is not unique in this respect; many municipalities report high numbers of incomplete applications.¹¹ Incomplete applications arise for a number of reasons. Consider the following three:

- *Numerous Requirements* — The range of plans, analyses, documents and other pieces of information that must be obtained and included with building permit applications is considerable, particularly applications for commercial and other complex buildings. The continual growth in *Building Code* standards and complexity over time only adds to the list of attachments required.

Staff in many places, including Nanaimo, have created application checklists in an effort to help applicants develop complete packages. The checklists likely reduce the number of incomplete submissions but do not eliminate the problem altogether. Indeed, some of the stakeholders interviewed in Nanaimo find the checklists themselves to be overly complex.

¹¹ See for example the District of Saanich's 2018 report titled *Building Permit Process Review*.

- *Numerous Professionals to Coordinate* — Applications for all complex buildings and some standard buildings require plans, drawings, analyses and other items from architects and engineers — referred to as Registered Professionals (RPs) in the *Building Code* — to be included in the submission packages. One professional on the file is the designated Coordinating Registered Professional (CRP) who is responsible for coordinating all design work of the other professionals to ensure that the design substantially complies with the *Building Code* and other safety-related enactments.¹² It can be difficult in some jurisdictions, including Nanaimo, for CRPs to schedule and coordinate all RPs' work on a file in a timely fashion.
- *Time Pressures* — In high-growth centres such as Nanaimo builders, developers and professionals are under significant pressure to meet timelines imposed on them by owners and/or market conditions. In some cases, the agents responsible for submitting applications submit incomplete applications simply to "get into the queue".¹³

Regardless of the reasons behind them, incomplete applications that are submitted to the City serve only to slow down the application review process for all applicants, including those who have taken the time and effort to submit high quality, complete packages. All applications that are submitted must be uploaded by Development Service Clerks into the City's Tempest system, then given preliminary review by a Building Official to determine the level of completeness. For all incomplete packages, the Building Official must prepare a letter to the applicant to identify the items that are missing. In many cases, the deficient file is held in the queue for 30 days to give the applicant an opportunity to correct the issues. In some cases, the file is simply rejected and returned to the applicant.¹⁴

All of these steps taken by the Development Service Clerks and the Building Official take time that could be spent attending to complete files. It is the applicants of these complete files that are disadvantaged when incomplete applications enter the system. It is not surprising given this outcome that several of the stakeholders from the development industry interviewed for this review highlighted incomplete applications as a issue to address.

¹² Other enactments include the *Architects Act*. The CRP is also responsible for coordinating all field reviews that are conducted by the Registered Professionals during construction.

¹³ This practice is the subject of an October, 2020, *Practice Advisory* issued by the Engineers and Geoscientists of British Columbia.

¹⁴ It is worth noting that the COVID-driven transition at the City from in-person to online submissions has exacerbated the issue of incomplete applications. Under the in-person system, Building Officials at the front counter could review submissions for completion and turn away incomplete packages in real time. The online system requires the City to receive all submissions and convert them to Tempest, then have Building Officials to respond to applicants in writing.

Internal Referrals

Building permit applications for complex buildings and some standard buildings must be referred by the Building Inspections Section to other sections or departments (e.g., Fire Department, Development Engineering, Planning) for review and approval of specific development aspects. In order for referrals to work smoothly, the Building Section needs to be able to rely on professionals in other groups to conduct their reviews and return their comments in a timely fashion.

Building Officials also need to ensure that referral groups' needs for additional information from applicants are communicated to the applicants so that deficiencies can be corrected and the referrals completed. Building staff report that there is some confusion over who has responsibility for prompting the applicants to act. This confusion had resulted in delays in processing.

Each week, senior staff from the Building, Development Engineering and Planning Sections at the City meet to review permit files that have been referred to by the Building Section for review. A dashboard tool is being created to better monitor the status of all files reviewed at the meetings. These initiatives have helped to accelerate referrals and meet the needs of all departments involved. Further steps may be required (see Chapter 4).

Reliance on Professionals

The regulatory framework for building construction in British Columbia anticipates that property owners who wish to construct or alter complex buildings will require the expertise of professional architects and engineers to create building plans that comply with the technical standards set out in the *British Columbia Building Code* and other safety-related statutes and regulations. These professionals are accredited and held accountable by self-governing professional societies that are:

- responsible for ensuring their members are fully-qualified to practice in their chosen fields
- empowered and required by statute to protect the public interest

The *Building Code* contains a Schedule B form that requires each Registered Professional who is assigned to a building permit application to give assurance that the design of the specific, identified components of the plans and supporting documents prepared by the Registered Professional in support of the application "substantially comply with the British Columbia Building Code and other applicable enactments respecting safety...".¹⁵ A signed copy of Schedule B is included in the complete application package for a municipal building permit, along with a signed copy of another schedule — Schedule A — from the Coordinating Registered Professional.

¹⁵ *British Columbia Building Code (2018)*, Schedule B.

The City of Nanaimo *Building Bylaw 2016, No. 7224*, similar to that of several other municipalities, is carefully modelled after a 2002 core building bylaw created by the Municipal Insurance Association of BC (MIABC) to help municipalities manage risk and limit their exposure to liability related to the regulation of construction. Part 11 of the City's bylaw speaks to the role of Registered Professionals and the need for schedules. Section 11.1 notes that the Schedule B assurances "are relied upon by the municipality and its Building Officials as certification that the design and plans to which the [assurances] relate comply with the Building Code and other applicable enactments relating to safety." The City's bylaw, coupled with the requirements set out in the *Building Code's* Schedules, gives Nanaimo the ability to place the onus of ensuring compliance with *Building Code* requirements on Registered Professionals.

Some members of the development industry interviewed for this study point to the City's bylaw and the *Building Code* provisions to make the argument that the City should rely on the assurances of professionals to determine compliance.¹⁶ Reliance on the Registered Professionals would reduce expectations on the City's own Building Officials to review complex building applications in detail which, in turn, would reduce the City's overall permit processing time. City officials understand this argument and accept that the *Building Bylaw* is designed to transfer risk and responsibility of ensuring compliance to Registered Professionals, and protect the City from liability. The same officials, however, raise a number of cautions in opposition to any change. Officials note, for example, that:

- there are numerous examples of building permit applications with designs that do not comply with important, safety-related *Building Code* requirements, despite the assurances of the Registered Professionals
- the City is expected by the community to ensure that structures built pursuant to City building permits are safe for their occupants and the surrounding neighbourhoods
- efforts to transfer risk and liability to owners and Registered Professionals are of little practical value in cases where the companies and professionals involved either have insufficient insurance, or are no longer in business

¹⁶ A few individuals made reference, as well, to the Certified Professional (CP) Program jointly administered by the Engineers and Geoscientists of BC and the Architectural Institute of BC. This program is available in four municipalities (Vancouver, Surrey, Coquitlam, Abbotsford) as an alternative approval process through which Building Officials rely on the assurances provided by Certified Professionals when issuing permits, typically for significant, multi-phased complex building projects. To achieve CP designation, an engineer or architect must complete significant coursework and undertake ongoing training. The certification, with the specialized training behind it, is intended to give municipalities an extra level of confidence in the professionals' work, over and above the assurances provided through the *Building Code's* Schedules.

At the time of writing, there are only 51 CP architects and 81 CP engineers in the province — numbers that reflect both the onerous practice requirements and the small number of jurisdictions that subscribe to the program. Given these numbers and the focus of CPs on projects that, on the whole, are significantly larger than those which get built in Nanaimo, the CP Program is not considered in this report.

- the principle of joint and several liability means that the City cannot transfer all risk and liability to the building owner and Registered Professionals in the event of design deficiencies that arise during or post-construction, and therefore should remain directly involved in plan checking in order to catch errors

For these reasons and others, local governments in British Columbia are reluctant to reduce their level of plan review and rely significantly on the assurances of Registered Professionals, even in cases where bylaws have been written specifically to enable greater reliance. Nanaimo is no different in this respect. With increasing building permit application volumes and demands for lower permit review times, however, calls for greater reliance on professionals are unlikely to abate. Nanaimo should consider initiatives aimed at increasing reliance on professionals in specific, targeted cases (see Chapter 4).

BUILDING INSPECTIONS SECTION

Number of Staff

At the time of writing, there are fourteen (14) full-time Building Officials in the Building Inspections Section. As shown in Chapter 2, eight (8) of the Building Officials work as Plan Reviewers, four (4) work as Building Inspectors, and two (2) are Supervisors. Collectively, this complement of staff processed close to 1,000 building permits in 2019, with a combined construction value of almost \$450 million.¹⁷ The number of Building Officials at the City has not changed in since 2014. In that year, the total value of all permits was \$203 million; in each subsequent year until 2019, total value did not exceed \$216 million.

Building permit value provides a useful indication of overall permit complexity, and for that reason is considered a better indicator of Building Official workload than the number of permits. Permit types are another useful indicator of workload. Figure 2.3 in Chapter 2 showed that the value of all permit types for complex buildings spiked in 2019 — indeed, commercial permits experienced the most significant spike of all types. In the residential permit category, multi-unit residential projects, which in most cases qualify as complex buildings, also experienced a significant increase in 2019, compared to single family residential permits which declined significantly from levels in previous years.

It is also worth noting that in the past five years, the list of items that Building Officials must examine has increased as result to changes in the *Building Code* — an updated version of which was introduced in 2018 — and, to a lesser extent, the City's bylaws and policies. In the same time frame, the province released the *BC*

¹⁷ As noted in Chapter 2, the number and value of permits were considerably lower in 2020; however, the first half of 2020 was impacted significantly by an industry slow-down at the beginning of COVID-19. 2019 is considered representative of totals going forward, including in 2021. Staff report that demand for permits in the first two months of 2021 was considerable.

Energy Step Code that Nanaimo, similar to most municipalities, has endorsed. These changes imposed additional duties on Building Officials.

All of these points suggest that the Building Section is wrestling with a considerably larger workload today than in the years before 2019 without any change to the number of Building Officials. The increase in workload per Building Official has resulted in increased permit wait times, as was shown in Chapter 2 (see Figures 2.6 and 2.7).

➤ **Other Municipalities**

Comparisons of staffing numbers and staffing adequacy across jurisdictions are inherently problematic since no two municipalities are exactly alike, and because permit construction values in individual municipalities can change significantly year to year. It is also the case that not all municipalities follow the same naming conventions for positions, and thus may inadvertently report inaccurate staffing numbers. Despite these challenges, cities often wish to understand where they sit relative to other similar-sized places.

Figure 3.1 compares Nanaimo to six other municipalities for 2019, the most recent pre-COVID period. In that year the total permit construction value per Building Official in Nanaimo (not including Supervisors or Managers) slightly exceeded the median and average values in the comparison group. Nanaimo's Building Officials, put differently, are processing a higher amount of permit construction value per staff than most places listed in the figure.

Figure 3.1
Permit Construction Value per Building Official
2019

Municipality	2019		
	Building Officials*	Total Permit Value (\$ million)	Permit Value (\$ million)/Staff
City of Nanaimo	12	445.4	37.1
City of Abbotsford	13	578.1	44.5
City of Chilliwack	6	264.0	44.0
City of Kamloops	8	288.3	36.0
City of Maple Ridge	9	215.0	23.9
District of Saanich	9	176.1	19.6
City of Victoria	8	285.0	35.6
		Median	36.0
		Average	34.4

* Includes Plan Reviewers and Building Inspectors. Some places involve both types of Building Officials in application review.

The value of Figure 3.1 is somewhat questionable — the more relevant information is the conclusion, noted earlier, that the City is wrestling with a considerably larger workload today than in the years before 2019 without any change to the number of Building Officials.

Building Official Experience

Nanaimo's Building Officials are well-qualified for their positions, and well-respected both by their peers in other centres and by members of the local development community. On the whole, however, Building Officials in the Section today are considerably less-experienced than the team that existed in past years. An analysis undertaken by the City compares Building Official experience levels between 2014 and 2020. Figure 3.2 presents findings from the data.

The level of experience of Building Officials is considered an important factor in the smooth and timely processing of permit applications. In general — there are exceptions — more experienced Officials have the knowledge and confidence necessary to

distinguish between significant and insignificant issues that may arise during plan reviews, and to judge when and when not to hold an application back pending further information. Conversely, Officials with less on-the-job experience may require more time to complete reviews.

Across jurisdictions, the labour market for experienced, qualified Building Officials has become increasingly tight in recent years. Recent changes to the *Building Act* that took effect at the end of February, 2021, will serve only to make the market tighter. Under these changes, Building Officials involved in the review of applications for complex buildings must be qualified Level III Officials for many multi-family developments, as well as for most commercial, industrial and institutional projects.¹⁸ In centres such as Nanaimo that are experiencing increased

Figure 3.2
Changes in Experience Level
2014; 2020

Metric	2014	2020
Average years' experience with City	11.6	7.7
Median years' experience with City	10.1	7.7
Building Officials > 15 years	4	1
Building Officials 10 to 15 years	2	3
Building Officials < 5 years	3	5
Registered Building Officials (Level III)	8	7

¹⁸ Building Officials who have not yet reached these levels can apply for and enter into a Building Official In-Training Class to temporarily work at the next higher level. At the end of the training period the Officials must pass the necessary qualification exams in order to continue working at the higher level.

application activity for complex buildings, Level III Officials are in high demand. Organizations will continue to compete for and try to recruit these individuals; in many cases, however, cities will need to focus on hiring and training lower-level and less-experienced personnel. Nanaimo should consider developing new opportunities aimed at helping less-experienced staff acquire skills and learning about the building industry. The potential for joint industry-City workshops and professional development seminars is put forward in Chapter 4.

Overtime Levels

City payroll data, presented in Figure 3.3, show that the Building Inspections Section has incurred significant overtime each year in the past three years. As indicated in the figure, the vast majority of overtime recorded is concentrated in the Section's Commercial group which is responsible for plan reviews of multi-family, commercial, industrial and other permit applications for complex buildings. There are five staff members in that group, including the Supervisor, three senior Level III Registered Building Officials, and one Level II Building Official. The Supervisor of the group accounted for over 50% of the group's overtime in 2018, close to 40% in 2019, and 32% in 2020.

The relatively high and consistent level of overtime worked by the staff in the Commercial group, and by the Supervisor specifically, is a function of a number of factors, including:

- increased activity in the number of complex building permit applications that require more effort and time on the part of staff
- a reluctance, noted earlier, to rely on the assurances provided by Registered Professionals
- the current level of staffing that has been fixed for some time
- the current practice for the Supervisor to examine closely the plan reviews completed by the Building Officials

Figure 3.3
Building Inspections Section Overtime Hours
2018 to 2020

Work Group	2018		2019		2020	
	Hours	%	Hours	%	Hours	%
Inspections	49.00	3%	18.00	1%	13.00	1%
Residential Plan Review	310.75	19%	183.00	11%	258.50	16%
MFR/Comm/Industrial Plan Review	1,311.25	78%	1,451.75	88%	1,338.50	83%
Total Hours	1,671.00	100%	1,652.75	100%	1,610.00	100%

The costs of the group's overtime are in part financial. Over the three-year period, the overtime incurred by the group totaled almost \$300,000, not including overhead. The annual average for the group was close to \$95,000. This amount is approaching the total cost (salary plus benefits) of an additional full-time Building Official.

The costs are also personal for the staff who work the extra hours. Excessive overtime hours are not sustainable for employees. Productivity, health and job satisfaction are all at risk under these conditions.

Organizational Culture

The culture of the Building Inspections Section is perceived by the development industry — and, indeed, by several of the staff interviewed — as one with the following characteristics:

- a higher-than-necessary level of scrutiny in reviewing applications
- an aversion to risk, even in cases where some risk may be considered both acceptable and necessary
- an unwillingness to engage with applicants in finding solutions to design challenges
- a fear of making mistakes, and a lack of tolerance for mistakes that are made
- a lack of transparency in permit reviews and the movement of applications through the system
- a reluctance to empower staff to make decisions
- an expectation that applicants who complain to the City about processing times or permit requirements receive special treatment (see below)
- high pressure and the risk of staff burnout

Increased permit wait times in the past few years have undoubtedly resulted in greater criticism directed at the Section, as well as increased scrutiny of the Section's processes, staffing model, decisions and other factors. In this environment, which is only exacerbated by COVID-19, it is perhaps not surprising that the Section might turn inwards and be less willing to relax its level of scrutiny in permit review or accept a higher level of calculated risk. The recommended changes in Chapter 4 are designed to reduce processing times, engage and empower staff, and promote a new working relationship between the City and industry. It is anticipated that these changes, taken together, will help to shift the organizational culture in the Section.

Applicant Complaints

It is not uncommon in Nanaimo for applicants who are dissatisfied with the building permit application requirements and/or processing times to register their dissatisfaction with the City.¹⁹ The ability of applicants to contact the City, enquire about specific cases and hold the City accountable is an important applicant right.

¹⁹ Nanaimo is not unique in this respect.

Such enquiries may become problematic, however, when they are used by applicants in attempts to obtain special treatment. The enquiries may be even more problematic when those making them succeed in achieving the treatment they seek.

Staff and development industry members interviewed for the study highlighted a growing problem with applicant complaints. Specifically, there is a belief that in Nanaimo the way to get permits faster is to raise complaints directly to management. There is a perception that, in an effort to address complaints that are received, the Section may inadvertently have developed a "squeaky wheel gets the grease" dynamic. This dynamic, it is feared, results in a *de facto* fast track that benefits applicants who, in many cases, have not met the City's expectations for complete applications, or who are having their applications processed at the same speed as all others. Other applicants who fall outside of this complaints fast track worry that they are being penalized for their good behaviour.

These perceptions — that a "squeaky wheel gets the grease" dynamic has developed, and that complainants are fast tracked — need to be qualified. Managers in Development Services have a responsibility to investigate all significant building permit complaints that reach them. Based on their enquiries of staff and their review of the subject file in each case, managers will determine the appropriate action.

- In many cases, it will be clear that the applications at the centre of the complaints are deficient, and that the applicants have either misunderstood the requirements of the City or have chosen to ignore them. Managers in these cases do not — and, indeed, should not — direct staff to issue the permits or to fast-track them in any way.
- In other cases, managers will determine that the applications are not deficient, but for whatever reason have been inadvertently subjected to a delay that exceeds that which, even in a high-volume period, is acceptable. In these cases, managers may apply their judgement to expedite processing.
- There will be some instances when managers will disagree with staff on the reasons for holding back applications. Using their judgement, managers may apply their interpretations to the files and allow the applications to proceed.

In short, there will be times when complaints do result in action on the part of the City to issue permits, or to issue them faster than it would otherwise do. To suggest that there is a prevailing "squeaky wheel gets the grease" dynamic, however, is inaccurate.

It is worth noting that even in cases where complaints are ultimately found to be without merit, managers and Building Officials must take time away from their duties to investigate and respond to the applicants. The disruption to the Section's work flow in these cases is not inconsiderable.

Recommended changes in Chapter 4, designed to improve the processing of all permits, will help to significantly reduce the number of complaints and the impact that complaints have on management and staff time. In so doing, it is hoped that the changes will help to address the perception of a complaints fast track that exists in some circles. Legitimate and illegitimate complaints will not, however, cease entirely.

TECHNOLOGY

Receipt of Applications

Prior to March, 2020, all applications for building permits were submitted in-person by applicants at the City's Permit Centre. With the outset of COVID-19 there was an urgent need to design an online submission capability for all permit types. The Building Inspections Section, with the assistance of the City's Information Technology Department, responded to this need and put in place the necessary process in short order.

The process that was developed is innovative in its use of readily available tools, such as fillable PDF forms and DocuSign software. The process is not, however, an effective long-term option for the City. At present, applicants submit completed application forms using DocuSign to the City and either append or upload PDF versions of all required building plans, drawings, forms and other attachments. Development Service Clerks who receive the packages must manually transfer the application information into a Tempest folder that can be forward to a Building Official for preliminary review. All attachments must be converted and renamed in order to be accessible to the Building Official. Each standard residential permit application takes a Development Services Clerk up to 30 minutes to convert to Tempest. Applications for complex buildings take upwards of two hours each — some much longer.

The Section's reliance on the current online process creates an additional problem, noted earlier, related to incomplete applications. Previously, under the counter-based process, applications would be received directly by the intake Building Official who would assess them for completeness with the applicant present. Missing items could be identified for action by applicants; incomplete applications could be turned away and prevented from entering the permit processing queue. Today, in the current online submission system, all applications are received and placed into the system by a Development Services Clerk for preliminary review by a Building Official. Incomplete applications — there are several — must be identified by the Building Official and either set aside pending completion, or rejected entirely. In each case the Building Official must write an explanatory letter to the applicant with a list of deficiencies to correct. The time required by the Building Official is considerable and has resulted in significant delays at the preliminary review stage of the permit process.

Improvements to the current online process — see Chapter 4 — are possible; however, all changes will require resources and the support of the organization.

Credit Card Payments

Application and building permit fee payments must be made by credit card under the new COVID-19 application process. Unfortunately, however, the current system is not set up to allow applicants to make credit card payments online. A Development Services Clerk is required, instead, to contact applicants by phone and take credit card information manually, process the payment, and send out a receipt by email. The process is time consuming and does not represent an efficient use of staff resources.

A separate issue related to credit card payments concerns the 2% service charge the City incurs on every transaction. Staff report that in the past ten months, the City has incurred a total of close to \$40,000 in credit card fees that it did not incur previously. A credit card fee recovery module is available for a one-time charge of \$33,525, plus an annual \$5,200 licence fee, to add the credit card fee to the cost of the permit. At the current level of building permit fees, a total of \$208,000 in building permit fee revenues per year would be needed to cover this annual licence charge (in 2020, the City earned \$1.8 million in permit fee revenues).

Transparency of Process

Applicants whose permit applications are accepted for review by the City are able to monitor the status of their applications in the City's review process through the MyCity online portal. The ability to monitor an application supports the need for transparency and has the added potential to reduce both the need for applicants to call the City for updates, and the number of enquiries that must be handled by Development Service Clerks.

The difficulty with the current MyCity portal is that it does not appear to provide the level of detail desired by many applicants. The applicant is given the stage at which his or her application is sitting, but is not given any indication as to how long the application is expected to remain at a given stage, the application's place in the queue, or whether the City is waiting for additional information to be provided. Improvements to the portal to provide these types of details would enhance transparency and provide applications with greater certainty.

RELATIONSHIP WITH INDUSTRY

Partnership

Through the Building Inspections Section, the City performs an important regulatory role in ensuring that all new construction, and all alternations to existing structures, proceeds in compliance with the *Building Code*. The City must also perform, however, the role of facilitator to help industry build quality projects that add value to, and that meet the needs of, the community.

Industry depends on the City to perform its role of regulator in a timely fashion, and to work with applicants to facilitate solutions and provide pathways for

development to occur. The City depends on Industry to bring forward complete applications for innovative, affordable and high quality projects that meet the standards of the *Code* and the expectations of the community.

The development system runs most smoothly when both parties view themselves and each other as partners in building the community. True partnership requires both parties to engage with one another regularly, learn about each other's pressures and challenges, and collectively develop solutions to problems that arise. In recent months there have been some efforts, spearheaded by the Nanaimo Development Group, to engage with one another and collaborate in the development of new approaches on specific issues. The joint development of draft change management procedures to efficiently deal with revisions on active building permits for complex buildings is the best example of these efforts. On the whole, however, opportunities for engagement have been lacking.

Without increased engagement the parties cannot develop the trust and understanding that are needed to truly view themselves as partners in the building process. Indeed, a lack of regular engagement and collaboration can lead to mistrust on the part of both parties, and a lack of confidence in abilities, and suspicion with respect to motives. It is clear from the interviews conducted with industry members and staff that mistrust, a lack of confidence in one another, and suspicion are prevalent in Nanaimo today.

Outreach and Education

The City has created a range of impressive written materials and helpful videos that can be accessed online by all prospective building permit applicants. These materials are useful in identifying the City's requirements for different types of permit applications. The written materials are not sufficient on their own, however, for building the level of understanding required by many applicants, including those who are seeking permits for complex buildings.

Some municipalities — Langley Township, Surrey, Abbotsford and Penticton are examples — organize regular seminar sessions and open houses on specific topics of interest to different groups of applicants. Some sessions may focus on emerging topics and new requirements, such as the *BC Energy Step Code*. Others may introduce new policies of the municipality that will be used by Building Officials to interpret sections of the *Building Code*. In some cases, the events will be open-agenda and be held simply to allow stakeholders to ask questions of Building Officials and decision-makers.

Seminar sessions, open houses and other forms of outreach provide opportunities for municipal staff and Industry members to engage with one another, learn from one another, and learn about each other. All of these events contribute to building relationships and trust. In past years, Nanaimo organized and/or participated in some of these types of outreach events. The Section has not pursued these opportunities in any serious way, however, for some time. There is an opportunity

to work with organizations such as Nanaimo Development Group and the Vancouver Island Construction Association to co-sponsor and -deliver these events.

**BUILDING PERMIT
FUNCTION REVIEW**

DRAFT REPORT

NEILSON
STRATEGIES

CHAPTER 4 RECOMMENDED CHANGES

This review of Nanaimo's building permit function set out to identify, through consultation and research, specific issues that the City may wish to consider in its efforts to reduce permit wait times and improve the function in other ways. Chapter 3 of the report presented a broad range issues in under four categories:

- the process through which permit applications are reviewed
- the Building Inspections Section that is responsible for the function
- the City's use of technology
- relationships between the Building Inspections Section and Nanaimo's development industry

This chapter — Chapter 4 — presents a package of recommendations that are intended to address the issues.

SUMMARY OF ISSUES

Before introducing the recommended changes, it is useful to summarize the issues that the changes are intended to address. Figure 4.1 presents the summary using the four issue categories.

Figure 4.1
Summary of Issues

Building Permit Process	Building Inspections Section
<ul style="list-style-type: none"> – Limited Streams – Incomplete Applications – Internal Referrals – Reliance on Professionals 	<ul style="list-style-type: none"> – Number of Staff – Building Official Experience – Overtime Levels – Organizational Culture – Applicant Complaints
Technology	Relationship with Industry
<ul style="list-style-type: none"> – Receipt of Applications – Credit Card Payments – Transparency of Process 	<ul style="list-style-type: none"> – Partnership – Outreach and Education

OBJECTIVES TO ACHIEVE

It is also helpful, before turning to the recommendations, to recall the objectives identified for the review. These objectives, adapted from the list in Chapter 1, are as follows:

- *Reduce Permit Processing Times* — The review was driven by the desire, expressed by the development community and shared by the City, to reduce the time required to review building permit applications and issue building permits.
- *Limit the City's Liability* — The City seeks to create a permit system that limits liability to taxpayers, while at the same time achieving reasonable processing times, and ensuring the development of a built environment that is safe, attractive, high in quality and affordable.
- *Engage Industry in Developing Solutions* — The City and the development industry play different roles and have different responsibilities in the development process. Both parties, however, share a common interest in creating an environment for affordable, safe, quality development to occur. Recommendations put forward in the review should recognize that industry and the City are partners in the development process. Both parties have a role to play in developing and making solutions work.
- *Engage Staff* — Staff involved in the building permit function have a good understanding of function, and have useful ideas for streamlining the permit process and achieving other improvements. Staff have a role to play in designing and implementing solutions.
- *Pursue Cost Neutrality* — The City has come to rely on a high degree of cost-recovery in its building permit function. Cost increases that would result from recommended changes should, therefore, be balanced as much as possible by offsetting revenue increases.

RECOMMENDED CHANGES

This section presents and explains seven recommended changes for the City to consider. The full list is as follows:

- THAT the City work with industry to develop and implement a Fast Track Process to process applications for targeted, low-risk tenant improvement and residential projects
- THAT the City establish and Fast Track Permit Group in the Building Inspections Section, with one new Supervisor position and one new Building Official position, to process fast track applications
- THAT the City work with industry to establish a time-limited Approved Professionals Pilot Project to test the ability to rely on the assurances of Registered Professionals in issuing building permits for targeted complex building projects

- THAT the City engage industry in the establishment of a Joint Building Permit Advisory Working Group with a mandate to advise on the design and implementation of initiatives aimed at reducing permit processing times, promoting City-industry relations, and addressing other issues and needs identified by the parties
- THAT the City support investments in technology to develop an online applications portal, facilitate online permit fee payments, and build a user-friendly application tracking dashboard tool for permit applicants
- THAT the City develop an internal service agreement to set out expectations for the processing of referrals by affected work groups
- THAT the City, to the extent possible, recover the costs associated with the recommendations in the *Building Permit Function Review Draft Report* through:
 - savings in overtime costs that are incurred today by Building Officials
 - grant monies available under the Ministry of Municipal Affairs' recently-announced Local Government Development Approvals Program
 - increases to the City's building permit fees to align the fees with those charged by other 100,000 population-plus, high-growth municipalities

FAST TRACK PROGRAM

The City should consider creating two building permit fast track streams to provide for the expedited processing of applications for low-risk, straightforward projects.

- *Tenant Improvement Fast Track* — One stream would be reserved for low-risk tenant improvement applications. Eligible applications would be processed, and permits would be issued, within a target time of ten days (i.e., two weeks).
- *Residential Fast Track* — The second stream would be reserved for low-risk residential applications. Eligible applications in this stream would be processed, and permits would be issued, within a target time period of five days (i.e., one week).

Eligibility criteria for both streams would be proposed by a Joint Building Permit Advisory Working Group comprised of five (5) industry representatives and five (5) City staff. The Joint Working Group would be guided by criteria that are in place in similar fast track programs in other jurisdictions such as Penticton, Kelowna, Coquitlam, Burnaby, Barrie and Toronto. Figure 4.2 provides some examples of criteria from these other programs. Full tenant improvement program guides from Coquitlam and Barrie are provided in *Appendix I*.

Figure 4.2
Sample Criteria for Fast Track Program

Tenant Improvement Fast Track	Residential Fast Track
<ul style="list-style-type: none"> – issued for minor alterations to existing building elements, and for minor alterations to existing plumbing and mechanical systems – commercial uses located in commercial and industrial zones – no proposed change of use – no net change to the floor area of the unit or gross leasable floor area in a building – minor exterior alternations and additions under <u>\$150,000</u> in construction value – minor plumbing changes that involve replacement of existing fixtures 	<ul style="list-style-type: none"> – exterior decks, porches, solar panels – interior renovations – plumbing, mechanical and wood stoves – accessory buildings (not including carriage houses) – garages and carports – landscaping and pools – fire, flood and structural repairs – no zoning variances or alternative code solutions

Based on experiences in other municipalities, it is anticipated that a significant portion of tenant improvement and residential permit applications submitted to the City could be eligible for entry to the fast track program. The program would benefit eligible applicants who would receive their permits in a short period of time. The program would also benefit, however, applicants in the standard process streams by removing minor permit applications from those streams.

FAST TRACK PERMIT GROUP

The assessment of issues in Chapter 3 highlighted the need for additional Building Officials in the Building Inspections Section, which is no longer able to operate efficiently with its existing number of staff — a number that has been fixed for some time. Relief for the Commercial group is particularly important given the consistently high overtime incurred by Officials in that group.

To address both the need for additional staff resources and the recommendation for a fast track program, the City should consider creating a third work group within the Building Inspections Section. This third group's primary role would be to process fast track permit applications. Depending on workload and capacity, the group could also assist with demolition permits, and could assist with compliance and enforcement orders. Both of these tasks require attention in the Section.

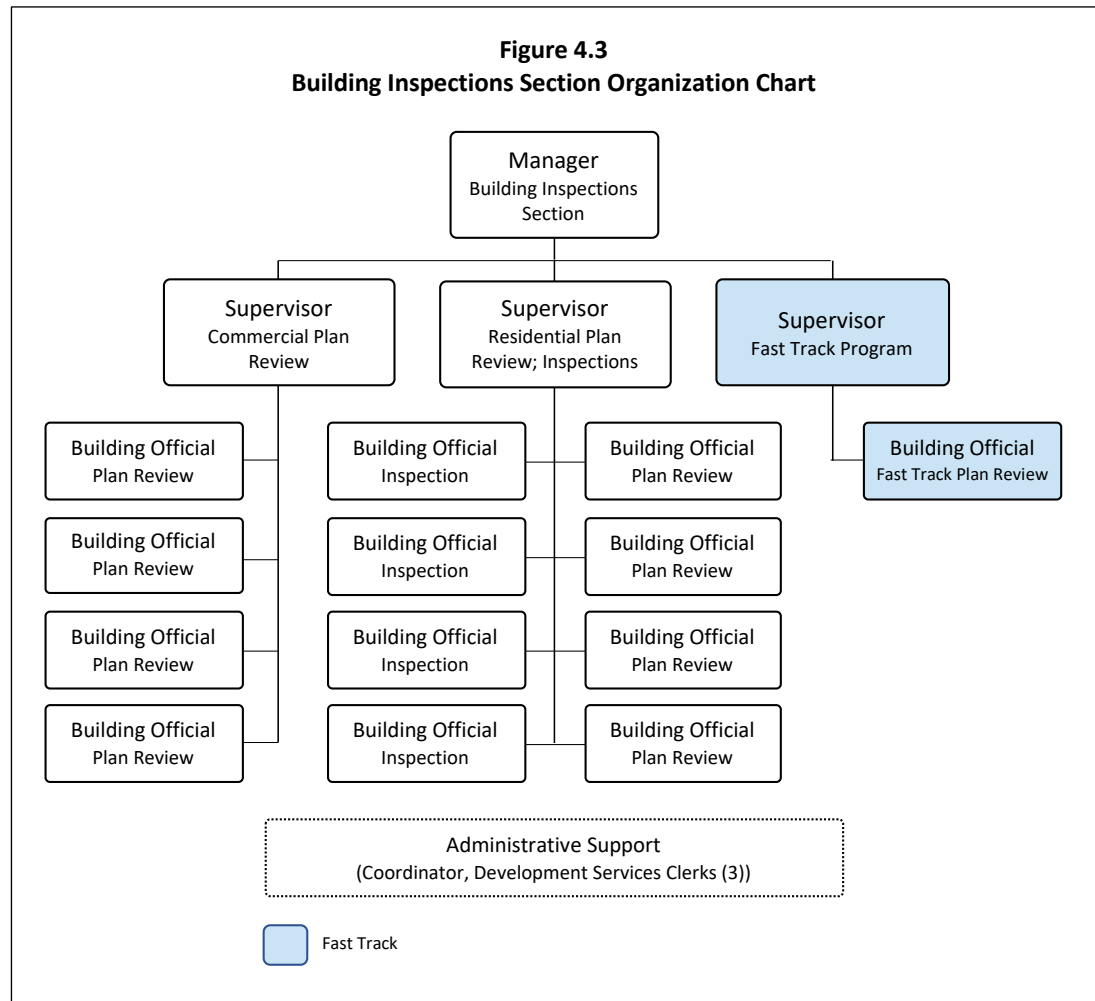
The City should consider staffing the new group with two new FTES, including:

- one Supervisor, Fast Track Program

- one Building Official²⁰

Administrative support for the new group would be provided, at least initially, by the existing Administrative Support Team for the Section. It is anticipated that recommended changes examined later in the chapter would help to free-up existing Development Service Clerks from some their current tasks required under the existing (temporary) online submission process.

Figure 4.3 shows the proposed group on the Section's organization chart.



²⁰ The Building Official would either be qualified at Level I and enrolled in a Building Official In-Training Class to temporarily work at Level II. Alternatively, the Official would be qualified as Level II and enrolled in a Building Official In-Training Class to temporarily work at Level III. The exact qualification level required would be determined by the eligibility criteria for tenant improvement fast track permits.

APPROVED PROFESSIONALS PILOT PROJECT

The discussion on Registered Professionals in Chapter 3 highlighted the point that the regulatory framework for building construction in British Columbia anticipates that property owners who wish to construct or alter complex buildings will require the expertise of professional architects and engineers to create building plans that comply with the *Building Code* and other safety-related statutes and regulations. The discussion noted, as well, that the requirement for Registered Professionals to provide assurances through the submission of Schedules A and B, coupled with Nanaimo's own *Building Bylaw* provisions, gives the City the ability to rely on Registered Professionals to ensure that building plans are, indeed, in compliance with *Building Code* requirements.

Some members of Nanaimo's development industry have pointed to the *Building Code* and *Bylaw* provisions to call on the City to place greater reliance on Registered Professionals, and reduce the level of review conducted by City Building Officials on applications for complex buildings. These changes, it is expected, would reduce the overall permit processing time for the applications. City officials understand the arguments put forward, but cite a number of legitimate reasons for exercising caution.

In the years ahead, calls for greater reliance on Registered Professionals are not likely to abate given escalating building activity, the widespread desire for reductions in processing times, and the ever-increasing expansion of the *Building Code's* technical requirements. A joint initiative by City Building Officials and professionals in Nanaimo's development industry aimed at increasing reliance in specific, targeted cases would position Nanaimo at the front end of regulatory innovation, and could pay dividends to both the City and industry.

The City should consider working with industry, through a Joint Building Permit Advisory Working Group, to design, propose and implement a time-limited Approved Professionals Pilot Project. The following points identify the basic elements of the project:²¹

- *Targeted Applications for Complex Buildings* — A small, limited number of building permit applications for complex, Part 3 buildings would be selected by the City based on discussions with property owners and/or agents who have strong track-records with the City, and a significant presence in Nanaimo.
- *Approved Registered Professionals* — Each application selected for the pilot would be supported by an experienced Coordinating Registered Professional (CRP) and a team of specialist Registered Professionals (RPs) approved for

²¹ It should be emphasized that the points listed here are the basic proposed elements. The full design and implementation of the pilot project would be the role of the Joint Building Permit Advisory Committee.

participation in the pilot by the City. The CRP and RPs would have unblemished records with their professional societies, have strong track-records with the City, have a significant presence in the community, and possess sufficient professional insurance.

- *City Policies* — With input from industry, advisors at MIABC, and the City's own legal counsel, staff would develop policies to identify:
 - that in issuing the building permits under the pilot project, the City would be relying on the Registered Professionals' letters of assurance (i.e., the Schedules) as certification that the design and plans to which the assurances relate comply with the *Building Code* and other applicable enactments relating to safety
 - the reduction in permit fees that would be provided by the City to applicants in the pilot project
 - the specific items in the building plans and application package components that the City's Building Officials would examine (there would be important items related to health and safety that Building Officials would be expected to review)
 - the specific items in the building plans and application package components that the City's Building Officials would *not* examine
 - how the City would address unexpected issues that came to its attention, outside of the City's own scope of review
 - that during construction, the City would be relying solely on field reviews undertaken by the Registered Professionals, and the letters of assurance (i.e., Schedules) submitted by the Registered Professionals that the construction substantially complies with the *Building Code*, the *Building Bylaw* and other applicable enactments related to safety
 - all insurance and bonding that would be required of applicants and Registered Professionals under the project
 - other items raised during the joint design of the project, or raised by the City's advisors
- *Monitoring and Reporting* — A Joint Pilot Project Reporting Group, appointed by the Joint Advisory Working Group, would monitor the implementation of, and all progress under, the pilot project, and report its findings to the Working Group. The Group would be comprised of Building Officials, Registered Professionals and owners/agents involved in the

project, and would meet at scheduled points during permit processing and construction. A final report on the experience, complete with lessons learned and recommendations to consider, would be prepared by the Reporting Group.

Based on the results of the project, the City, with input from industry, could decide whether to extend the term of the pilot, incorporate elements of the pilot into the City's permit process system, or end the pilot and revert to the existing permit processing system.

JOINT BUILDING PERMIT ADVISORY WORKING GROUP

There is a clear and widespread desire on the part of City Building Officials and members of Nanaimo's development industry to engage with one another, better understand each other's role in the building process, learn from each other, and work together to develop and implement initiatives aimed at improving the permit process for all parties. These sentiments emerged consistently during the interviews conducted for the review.

To promote greater connection the City should consider working with industry in the creation of a Joint Building Permit Advisory Working Group. The Working Group would be comprised of:

- five (5) City staff members, including the Director of Development Approvals, and the Manager of the Building Inspections Section
- five (5) representatives of the development industry identified by the City through consultation with associations such as the Nanaimo Development Group, the Vancouver Island Construction Association and the Nanaimo Home Builders' Association

The Working Group would be responsible for designing and proposing, for approval by the City's General Manager of Development Services, the:

- eligibility criteria for the tenant improvement and residential streams in the proposed Fast Track Program
- specific elements, requirements and terms for the proposed Approved Professionals Pilot Project

The Working Group would also be responsible for developing a calendar of joint workshops, seminars, open houses, site visits and other events aimed at helping Building Officials (particularly less-experienced Officials who may be hired in the coming years, or who are in place today) learn about the building industry, and the challenges and pressures experienced by builders, developers and professionals. The events would be aimed, as well, at helping members of the development industry learn about the City's process and expectations, and understand the challenges and pressures experienced by Building Officials.

Some of the events could focus on changes to the *Building Code* and other emerging topics in an effort to provide professional development to both groups. Where possible, these events could be designed as opportunities for participants to satisfy continuing professional development requirements of their professional or industry associations. Other events would focus on specific issues identified in this review, such as the need for improved application packages. The Nanaimo Development Group has made itself available to work with the City, under the umbrella of a Joint Group, on an initiative aimed at helping applicants prepare high-quality, complete building permit applications.

Over time, the Joint Working Group could evolve beyond building permits specifically to address other elements of the City's development approval processes. For the time being, however, it is suggested that the Working Group focus on building permits. The Working Group could also develop working groups, as required, to undertake specific initiatives.

INVESTMENTS IN TECHNOLOGY

As noted earlier in the report, the City's existing online application process was designed and implemented in short order in response to impacts from COVID-19 and the need for immediate change. The City appreciates that the process does not represent an efficient use of staff resources, and is not a long-term solution. The need for investment in a proper system is also understood.

Investment in the online application system is required specifically to design and implement an application portal — or portals, as the case may be — to replace the current use of fillable PDF forms and DocuSign for submitting permit application packages. Information entered into the new portals by applicants would flow directly to the main processing software platform, and thus eliminate the need for Development Service Clerks to manually build separate digital project files. Interactive checklists in the portals could be designed to prompt applicants for key information items, and could prevent incomplete applications from entering the system. This feature could save considerable time for the Building Officials by reducing the volume of deficient applications that must be reviewed and returned, with comments, to applicants.²²

Investment is also required to implement an online payments system to eliminate the need for a Development Services Clerk to manually take credit card payments by phone for application and permit fees. The City should consider recovering the 2% credit card service fee from applicants by adding it to the fees.

A third investment that the City should consider concerns the tracking system that can be used by applicants to monitor their applications as they move through the

²² Building Officials would continue to need (and want) to make themselves available to answer enquiries from applicants who need assistance in understanding and addressing application requirements.

review process. As noted earlier, the current MyCity tool does not provide adequate information or transparency to applicants. A new tool with dashboard graphics that alerts applicants to missing information items, shows where applications are at in the process, and provides anticipated timelines based on process stage would benefit applicants and the City.

The City's existing file management software platform, Tempest Prospero, could be configured with adequate investment to address all of these needs. As noted earlier in the report, however, CentralSquare, the company that recently purchased Tempest, has announced that the existing platform will be transitioning to a web-based system. Staff from the City's Information Technology Department are concerned that the new system will not meet the City's needs. Staff are also concerned that product support for the existing Tempest platform will be discontinued at some point, despite assurances from CentralSquare to the contrary.

The City will be considering its platform needs and options going forward. Whichever platform or set of solutions is ultimately chosen, investment in the application process elements described in this section of the text will be important to make.

INTERNAL SERVICE AGREEMENT ON REFERRALS

Applications for complex building permits must be referred by the Building Inspections Section to other sections, divisions and departments at the City for review of specific elements. Both parties to the referrals — the Building Inspections Section and the referral groups — rely on each other in the process. The Building Section relies on the referral groups to conduct their reviews in a timely fashion. Building also relies on the referral groups to quickly identify deficiencies and communicate with applicants to address the deficiencies. The referral groups rely on the Building Inspections Section to ensure that applicants submit the information required by the groups, and to process the referral groups' permit fees.

When communication is lacking, expectations are not understood and priorities are not aligned, the referral process does not function smoothly. The resulting delays cause problems not only for the referrals, but for the entire building permit process.

As noted earlier, Managers in the Development Approvals Division at the City meet weekly to discuss building permit applications that require attention by referral groups. A dashboard tool to help the Managers keep track of the applications is in the process of being developed. These initiatives are helpful and should be continued. In addition, however, the City may wish to develop and implement a simple internal service agreement that sets out:

- target timelines for completing referrals
- specific responsibilities of each party to the referral, including the responsibility for informing applicants of the need to supply additional information in order for their permits to be processed

- the types of applications that will be given priority by referral groups

Such agreements exist in other jurisdictions (e.g., Saanich, Toronto).

COST-RECOVERY

The recommendations presented in this report would, if accepted, result in cost impacts for the City. The most significant impacts would be associated with:

- the creation of the Fast Track Permit Group, which would be staffed by one new Supervisor and one new Building Official
- the recommended investments in technology

There are three potential sources of revenue that could be used to offset the cost impacts either fully or partly. These sources include:

- *Overtime Cost Savings* — It was identified in Chapter 3 that since 2018 the Commercial group in the Building Inspections Section has incurred close to \$95,000 per year in overtime costs. The recommendations presented in this report would, it is expected, reduce the workload of the Commercial group and thus allow the City to recapture a good portion of the group's overtime expenses for use in helping to fund the recommended changes.
- *Grant Monies* — The Ministry of Municipal Affairs announced in early March, 2021, a new grant program — the Local Government Development Approvals Program — through which local government can receive up to \$500,000 to support eligible projects. In the Ministry's release on the program, eligible programs are noted to include upgrades to a digital or online development application process. The City should consider submitting a proposal to the new program for funding to assist with the recommended technology investments.
- *Building Permit Fees* — A detailed municipal building permit fee comparison was outside of the scope of this study. A high-level review of fees charged in high-growth, 100,000 population-plus municipalities on Vancouver Island and in the Lower Mainland, however, suggests that Nanaimo's building permit fees, particularly for commercial permits, are relatively low. An increase to the median fee level could raise significant additional funds to help implement recommendations that would benefit the permit applicants who would be required to pay the fees.

APPENDIX I

TENANT IMPROVEMENT FAST TRACK PROGRAM GUIDES

- City of Coquitlam, BC
- City of Barrie, ON

**BUILDING PERMIT
FUNCTION REVIEW**

DRAFT REPORT

NEILSON
STRATEGIES

**MARCH 2021
APPENDIX I**

TENANT IMPROVEMENTS

FAST TRACK PROCESS

Planning and Development Department

Building Permits Division

604 927-3441 / permits@coquitlam.ca

GUIDE OVERVIEW

The City of Coquitlam Tenant Improvement (TI) fast track process is designed to facilitate the approval process for simple Commercial Tenant Improvement (CTI) Applications. The CTI Fast Track Process is designed for CTI applications involving retail oriented uses and regular offices that are located in specific commercial and industrial zones and that do not involve: a change in use, new or extended mezzanines, significant changes to plumbing, external modifications or net increases/decreases to floor area (including gross leasable floor area in planned shopping malls).

CRITERIA:

Fast Track Permits are issued for minor alterations to existing building elements, as well as minor alterations to existing plumbing and mechanical systems. Fast Track Permits cannot involve a change in use (as this would trigger Zoning Bylaw review by Development Planning staff). They are available for projects where the work involves no additions to or alteration in size of the structure, no structural changes requiring engineered design by a licensed professional engineer and that do not require plan referral to other departments. Fast Track Permits are for applications involving retail oriented uses and offices.

Fast Track Permits are limited in scope and must meet the following criteria:

- Applies to commercial uses located in all commercial and industrial zones.
- No proposed change of use.
- No net increase/decrease to the floor area of the unit or the gross leasable floor area in a building.
- No external modifications (unless the Development Permit has been issued and provided to Building Permits Division staff).
- Minor plumbing changes which are associated with replacement of existing plumbing fixtures (i.e., straight fixture replacements do not require a plumbing permit, however, if minor modifications to the plumbing system – fixture relocations, vent repositioning, fitting modifications, capping – are needed, the building permit may be issued in advance of the plumbing permit).
- Single Level Racking Systems without stair access (storage must be under 12' in height and the racking system must not exceed storage height of sprinkler system design capability)
- Minor exterior alterations and additions that are less than \$150,000 in construction value

TENANT IMPROVEMENTS

FAST TRACK PROCESS

Note: Any previous outstanding deficiencies, permits or unpermitted construction may result in a delay of your application processing or ineligibility of the use of the fast track permit process.

GENERAL REQUIREMENTS

This is a general list consolidating common requirements compiled for information only and should not be considered a complete list.

- Applicant to engage a professional when preparing drawings for this application.
- Substandard drawings will not be accepted.
- Permit drawings must provide sufficient information to describe the full scope of work.
- Submissions are required to comply with the latest version of the British Columbia Building Code and applicable City of Coquitlam bylaws and regulations.
- All drawings are to be neat, to scale and of draftsman quality.
- Metric or Imperial standard may be used, but not mixed.
- Agent Authorization Form (if applicable).

PERMIT SPECIFIC REQUIREMENTS

Three sets of all required plans must be submitted.

- Plans showing the location of the proposed improvement, including parking layout.
- Site plan indicating the relationship of work to adjacent tenancies.
- Architectural construction drawings at 1/8" to 1'-0" scale or greater (showing layout and dimensions of proposed work).
- Title search.
- Value of construction.
- Defined use of building and parking requirements, if applicable.
- Two sets of sealed structural drawings and Schedule B Letters of Assurance (complete with full legal description).
- Schedule "A" required if more than one registered professional is involved.
- Show all room use (unfinished to be marked as such).
- Occupant load calculation required (if occupancy classification has changed).
- Required exits (including door sizes, travel distances, etc.).
- Three sets of electrical drawings (i.e. emergency lighting and exit signs, etc.).

TENANT IMPROVEMENTS FAST TRACK PROCESS

- Show the location of the building on the property.
- Show all other buildings on the property.
- Show the north arrow, the property lines, label the streets and show the parking spaces.
- Identify the location of the tenant space in the building.
- Identify the parking spaces allocated for this tenant space (off street parking is based on the current Zoning Bylaw).

PERMIT SPECIFIC REQUIREMENTS CONTINUED

- New and existing work area calculations.
- Location of fire separations and assemblies (include details of rated assemblies).
- Cross sections through structures or detailed notes showing construction materials.
- Indication of all new beam sizes (structural) and lengths, door and window openings with sizes.
- Three sets of plumbing drawings.

COMMON SHORTCOMINGS THAT MAY DELAY THE ISSUANCE OF A PERMIT

Corrections, revisions and/or missing information that are not provided to City staff in a timely manner may result in the cancellation of the permit application.

Table 1 provides a list of application shortcoming examples. This list is not exhaustive and it is recommended that City staff be consulted prior to submitting a building permit application.

TABLE 1
Incomplete or missing information on the application: <ul style="list-style-type: none">• Drawings are not coordinated between registered professional disciplines.• Incomplete drawings, specification notes and quantities.• Unauthorized work either not identified or not addressed.• Site plans missing or submitted without the required information, such as:<ul style="list-style-type: none">• address;• unit number;• building number;• floor level;• identification of adjacent tenancies; or• parking requirements.• Engineered drawings for all structural modifications.

TENANT IMPROVEMENTS

FAST TRACK PROCESS

TABLE 1

- Plumbing drawings for:
 - new restaurants;
 - dentist/doctor offices; or
 - dry cleaners.
- Mechanical drawings for new kitchens (see [Commercial Cooking Equipment Guide](#)).
- Improperly executed Letters of Assurance.
- Architect’s or engineer’s drawings submitted without the seal of the registered professional.
- Poor quality draftsmanship.
- Submission of concept or schematic plans instead of construction drawings.

Common BC Building Code shortcomings:

- Handrail extensions required for exit and access missing from drawings.
- Rake back nosing proposed on stairs.
- Insufficient exits / egresses.
- Travel distances exceeded.
- Estimates of construction cost.
- Failure to provide new washrooms to “Accessible” standards (see our [Accessible Washroom Design Guide](#)).
- “Access” requirements for doors not accommodated (doors providing “Access” must be 3 feet minimum for 2’-8” clearance).
- Inadequate “Access” side door latch clearances.
- Required “Accessible” change rooms not provided.
- Emergency lighting and exit signs missed.
- Modifications to fire alarm system missed.
- Failure to provide swinging mandoor in the grill / sliding doors (i.e. in malls these doors must be included in allowed single egress suites served by grills / sliding doors).
- Missing plumbing permit submission.
- Missing sprinkler permit submission where partition relocations or new features affect the sprinkler design.

Common Development Planning shortcomings:

- Introduction of a new use not permitted in a particular zone.
- Failure to comply with Zoning or Development Permit provisions.
- Failure to comply with easement or covenant requirements.
- Failure to provide adequate parking.

TENANT IMPROVEMENTS

FAST TRACK PROCESS

FEES

Per the City of Coquitlam's [Fees and Charges Bylaw](#), you will have to pay an application fee when you apply. The permit fee is based on the calculated construction and equipment value within your tenant space and is payable when the permit is ready to be picked up and issued. The fees are broken down as follows:

- 25% of the permit value when the application is made.
- Balance of the permit value when the permit is issued.

INSPECTIONS

Complete information on inspections can be found on our [Inspections Permits page](#).

- Buildings and/or structures requiring a building permit will also require inspections performed by City Building Officials.
- Plumbing permits for new plumbing systems and services will require inspections by City Plumbing Officials.
- Fire suppression systems (building sprinklers) will require inspections by City Plumbing Officials.

This information is provided for convenience only and is not in substitution of applicable City Bylaws, Provincial or Federal laws and regulations. Always refer to official documents. The City is not responsible for errors found in copies or alterations of this document.



COMMERCIAL FAST TRACK PERMIT GUIDE

Process Requirements & Guidelines

23 April 2018

Process Requirements & Guidelines

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Commercial FAST TRACK Permit Guide

Commercial Fast Track Permit Guidelines

The City of Barrie Planning and Building Services department has implemented a Fast Track permit process for Interior Alterations for Commercial Buildings. This process is intended to reduce the permit issuance timeframe from 20 days (as regulated by the Ontario Building Code) to approximately 10 business days. Although we cannot guarantee permits will be issued within the 10 day period, we will endeavor to meet this expedited timeframe.

Our ultimate goal is to reduce the time it takes for smaller interior alteration permits to be processed and issued. In order to achieve this goal, there will be a set of rules in place to ensure this process is effective and beneficial to both the City of Barrie and the construction industry as a whole. As this is a new and evolving process, it is possible that there may be changes made along the way.

There will also be rules in place to prevent abuse of the Commercial Fast Track process in order to ensure fair and proper use by all. Please see the Terms & Conditions on page 5 of this document.

Required Documents

In order for this Fast Track process to be effective, the following drawings and information must be provided (please refer to the table Legend and Footnotes as needed):

Required Documents Legend:	
X = Required	O = Optional (i.e. only if applicable to design) R = Regulated Area

Document Type	Number of Copies	Business Personal Services	Mercantile	Backflow	Portables	Occupant Load Inspection
Building Permit Application Form	1	X	X	X	X	
Commercial Fast Track Form	1	X	X		X	
Payment in Full		X	X	X	X	X
Site Plan Drawing	3	X	X	X	X	
Floor Plan Drawing	3	X	X	X ⁽¹⁾	X	X ⁽⁷⁾
Life Safety Plan/Electrical Drawings ⁽³⁾	3	X	X		X	
Mechanical Drawings ⁽⁴⁾	3	X	X		X	
Supporting Documents ⁽⁵⁾	O	O	O	O	O	O
Demolition Plan (Before Drawing) ⁽⁶⁾	3	X	X			
OBC Matrix	3	X	X		X	
Commitment of General Review ⁽²⁾	1	X	X		X	
Occupant Load Form	1					X
Source Water Screening Form	1	R	R	R	R	

- (1) Floor Plan drawing showing where the backflow devices will be located.
- (2) Required to be signed by all professional Architects and/or engineers involved and by the owner. You must also identify the prime consultant.
- (3) Includes Emergency Lighting, Exit Signage, Travel Distance Analysis, and Fire Separations.
- (4) Includes Plumbing, HVAC, and Ventilation Designs.
- (5) Includes ULC Listed Assemblies and Device Specifications.
- (6) Drawing showing condition of suite prior to construction, any walls being removed, and previous use as defined by the OBC.
- (7) Sketch showing location and number of washrooms, exits (including the door width).

Submission Guidelines

In order to provide this increased level of service, we will only be accepting a total of 5 Commercial Fast Track applications each week. These applications will only be accepted on Mondays, in person, on the 8th floor of City Hall (in the Building Department) at this time. Our Building Officials will verify all required information is provided. If information is missing, your application will not be accepted and will be subject to the regular review process. Please refer to the Terms and Conditions on page 5 of this document.

What Qualifies?

As the scope and complexity of each project is different, the types of permit applications that qualify for this Commercial Fast Track process are limited. Outlined below are the accepted permit application types.

Business and Personal Services (Ontario Building Code - Group D)

As defined by the Ontario Building Code, Business and Personal Services means: the occupancy or use of a building or part of a building for the transaction of business or the provisions of professional or personal services.

Scope of Project	Business Examples	Exceptions
Interior Alterations to a suite with a suite area 300m ² (3230ft ²) or less that have been designed by Architects and/or Engineers.	<ul style="list-style-type: none"> ▪ Advertising and Sales Offices ▪ Barber/Hair Dresser Studio ▪ Beauty Parlour ▪ Banks Branches ▪ Chiropractor Offices ▪ Dental Offices ▪ Health/Fitness Clubs ▪ Massage Parlour ▪ Doctor Offices ▪ Legal/Accounting Offices ▪ Veterinary Offices 	<ul style="list-style-type: none"> ▪ More than One Floor ▪ Surgery or General Anesthesia ▪ Mixed Use Occupancies ▪ Dry Cleaning ▪ Any use of Heavy Timber ▪ Projects subject to the Development Charges Act (DCA's), Educational Development Charges (EDC's), or Parkland Dedication Fees

Mercantile (Ontario Building Code - Group E)

As defined by the Ontario Building Code, Mercantile means: an occupancy or use of a building or part of a building for the displaying or selling of retail goods, wares, or merchandise.

Scope of Project	Business Examples	Exceptions
Interior Alterations to a suite with a suite area	<ul style="list-style-type: none"> ▪ Department Stores ▪ Small Shops 	<ul style="list-style-type: none"> ▪ More than One Floor ▪ Mixed Use Occupancies

<p>300m² (3230ft²) or less that have been designed by Architects and/or Engineers.</p>	<ul style="list-style-type: none"> ▪ Hardware Stores ▪ Suites within Shopping Malls ▪ Restaurant (occupant load less than 30) 	<ul style="list-style-type: none"> ▪ Restaurants where patron space will increase ▪ Any use of Heavy Timber ▪ Projects subject to the Development Charges Act (DCA's), Educational Development Charges (EDC's), or Parkland Dedication Fees ▪ Requires NFPA 96 Hood (Commercial Kitchen)
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Backflow Preventer

As defined by the Ontario Building Code, Backflow Preventer means: a device or a method that prevents backflow in a water distribution system.

Scope of Project	Backflow Examples	Exceptions
<p>Installation of Backflow or Premise Isolation Devices.</p>	<ul style="list-style-type: none"> ▪ DVCA ▪ RP ▪ DuC ▪ SCVA ▪ DCAP 	<ul style="list-style-type: none"> ▪ Installation on Fire Protection Systems (i.e. Sprinklers and Standpipes).

Portable Classrooms

A Portable Classroom is a movable structure that can be relocated from one location to another and is used as a classroom for educational instruction in Elementary and Secondary schools.

Scope of Project	Examples	Exceptions
<p>Relocation of Portables from another location that have been designed by Architects and/or Engineers.</p>	<ul style="list-style-type: none"> ▪ Elementary School Portables ▪ Secondary School Portables 	<ul style="list-style-type: none"> ▪ Portables containing fueled-fired appliances.

Occupant Load Inspections

An Occupant Load inspection is typically done to accompany your application for a liquor license. This inspection provides the maximum allowed occupant load of the establishment in question.

Scope of Project	Examples	Exceptions
<p>Re-evaluation of the permitted occupant load of a building.</p>	<ul style="list-style-type: none"> ▪ Restaurants ▪ Bars ▪ Location where alcohol is served 	<ul style="list-style-type: none"> ▪ Only for existing buildings that have been previously occupied.

What Does Not Qualify?

Due to the complexity of the building, the following type of projects will not be included in the Commercial Fast Track process:

- Group A, B, C, or F Occupancies Classified in 3.1.2.1. of Div. C, Part 3, Ontario Building Code
- Designated Structures as defined under Article 1.3.1.1. of Div A, Part 1, Ontario Building Code
- Any building requiring extensive research, as determined by the Building Department
- Change of Use permits in buildings that have never had an occupancy (Shell Buildings)
- New construction or additions to existing buildings
- Any building that stores, uses, or dispenses hazardous chemicals or gases
- Any building containing vertical floor openings
- Any building that requires specialized ventilation or smoke control management systems
- Any project involving storage and racking systems or storage of high density files
- Sales Trailers
- Revisions to previously issued Fast Track Permits

Terms and Conditions

In order to provide fair and equal access, the following rules will apply to everyone who chooses to use this service:

1. All construction shall be built in accordance with the approved Commercial Fast Track permit drawings.
Consequence: Failure to build in accordance with the approved Commercial Fast Track Permit drawings will result in revisions being required. These revisions will not be fast tracked and will be in queue with all other permits. No work will be permitted to continue and no inspections will be permitted to be scheduled until the revised drawings have been approved. In addition, access to the Fast Track system will be suspended for a period of one year.
2. All Commercial Fast Track applications shall meet the requirements set out in this document.
Consequence: Failure to meet the requirements set out in this document will result in the permit application being switched to the normal review process.
3. While your Commercial Fast Track application is under review, no inquires will be accepted regarding the status of your application as this hinders the process and causes delays.
Consequence: Any voicemails or emails will be ignored unless we, the Building Department, have initiated contact with you for clarification.
4. Drawings shall be complete and meet all the requirements of the Ontario Building Code.
Consequence: If the drawings are deemed to be missing information and revisions are required, these revisions (once received) will be put in queue with the remainder of the permits and no longer fall under the Fast Track process.