

October 17, 2025

Carrie Dye
Director, Program and Change Management (Permitting Solutions Branch)
Ministry of Water, Land and Resource Stewardship
Parliament Buildings
Victoria, BC
V8V 1X4

Submitted via email to permittingsolutions@gov.bc.ca.

Re: Proposed Natural Resource Permitting Improvements

Dear Ms. Dye:

On behalf of the Canadian Home Builders' Association of British Columbia (CHBA BC), we would like to thank you for inviting us to participate in the six consultation sessions held in October on the following topics:

- Exemption for construction dewatering;
- Low volume water use without an authorization;
- Exemption for constructing ice roads to access restoration sites;
- Administrative penalties timelines;
- Expanding eligibility for stream restoration activities; and
- Riparian Areas Protection Regulation enhancements.

CHBA BC is supportive of the Province's goal to *"streamline permitting, remove barriers and delays, eliminate duplication, and simplify processes while maintaining high environmental standards and [its] commitment under the Declaration on the Rights of Indigenous Peoples Act"*. These are important objectives to support housing supply across the province and align with CHBA BC's [longstanding advocacy](#) to streamline permitting to help get more homes built.

We would also like to commend the Ministry of Water, Land and Resource Stewardship's efforts to *"increase efficiency, remove redundancy, and/or reduce administrative burden"*. This work, in combination with initiatives like Permit Connect BC and the Housing Navigator Service, represents meaningful progress toward more streamlined and coordinated permitting processes.

The Cost of Delivery Crisis

BC's residential construction sector is facing a **cost of delivery crisis** that is worsening housing affordability and attainability. The Canada Mortgage and Housing Corporation (CMHC) estimates that Canada needs **3.5 million additional homes by 2030** to restore affordability but is on track to fall short by **1.8 million units** due to lagging housing construction.

Rising construction costs, labour shortages, escalating government fees and taxes, and increasing regulatory complexity have created significant barriers to new home construction. These pressures continue to limit the building industry's ability to deliver housing at prices British Columbians can afford, further widening the supply gap and worsening attainability. Streamlined permitting and stronger coordination across permit-authorizing ministries are essential to reducing costs associated with permitting delays and will contribute to alleviating some of these pressures.

Exemptions

CHBA BC is supportive of the proposed expanded exemptions for construction dewatering and Riparian Areas Protection Regulation (RAPR). We appreciate the Ministry's efforts to identify opportunities where low-risk activities can be streamlined without compromising environmental outcomes. **We encourage the Province to continue identifying where similar exemptions might be appropriate across other permitting processes and ministries to further reduce duplication and redundancies.**

We would also recommend that technical manuals and other guidance documents be developed or updated to support consistent interpretation and implementation by local governments. Clear guidance on proposed changes and policy intent would also help industry better understand where exemptions may now apply for water licenses and authorizations, reducing applications for work that is now exempt.

Qualified Professionals

CHBA BC is very encouraged to see the Ministry begin exploring a framework for greater reliance on qualified professionals. We recognize that the Ministry's proposal to "*streamline the process for qualified proponents doing stream restoration*" to "*create more opportunities for qualified proponents to carry out stream channel or fish habitat restoration and maintenance projects*" is an important first step.

Establishing clear standards and expectations now will help ensure that future expansions of the qualified professional model are effective, consistent, and trusted by both the Province and proponents. As this framework is developed, **we recommend the Province continue to build on this work toward a system that allows increased reliance on qualified professionals to**

reduce permitting delays, minimize administrative burden, and enable provincial staff to focus on other priorities.

Other Key Considerations

We were pleased to see proposed clearer and newly added definitions under RAPR. Particularly, we are pleased to see that the Ministry intends to add a definition of 'institutional development'. **We recommend this definition includes block subdivisions pursuant to community planning processes.**

As a next step to improvements for the permitting process, we would also encourage the Ministry to consider mandated processing timelines for technical reviews under RAPR, as well as improving timely communications and accountability with members of the RAPR technical team to be able to resolve issues with RAPR notifications more efficiently.

Closing

Thank you again for undertaking this important work and for the opportunity to provide input. Efforts to streamline permitting and reduce redundancies are a welcome step that will help builders and developers deliver more **homes for people** across the province.

Sincerely,



Jenny Scott,
Director, Policy and Government Relations