

December 12, 2025

Carrie Dye
Director, Adaptive and Operational Strategies (Permitting Solutions Branch)
Ministry of Water, Land and Resource Stewardship
Parliament Buildings
Victoria, BC
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Submitted via email to permittingsolutions@gov.bc.ca.

Re: Proposed Natural Resource Legislation 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 consultation sessions held in November on the topic of "Natural Resource Permitting Improvements".

CHBA BC is supportive of the Province's goal to "improve the timing and transparency of permitting while maintaining high environmental standards". This is an important objective to support housing supply across the province and align with CHBA BC's [longstanding advocacy](#) to streamline permitting to help get more homes built.

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.

Overarching Considerations for Proposed Changes

We applaud the principles at the heart of these proposals which seek to reduce uncertainty, offer clarity, and thus address permitting delays. In achieving this common goal, **we recommend that the government provide targeted education, develop a suite of supporting guidance documents, and dedicate staffing capacity** to the additional volume of permitting cases that this proposal may elicit.

An educational campaign in the scope of natural resource permitting, for example a webinar series, would mitigate uncertainty and delays caused by broadening definitions of wetlands under the *Water Sustainability Act (WSA)*.

Similarly we propose the development of a suite of guidance documents to empower efficient and effective wetlands identification and the facilitation of associated mitigation measures. We see a need for mitigation hierarchy checklists and application templates, and maps that identify wetland regions in addition to the already-proposed best practices guide. Accurate wetland delineation maps, reviewed on a regular basis, will also support the ultimate goal of your proposal.

Lastly we recognize that these changes to permitting requirements and processes may lead to an increased workload beyond even the initial introductory stage of changes. This increased workload necessitates additional staffing and capacity to help ensure that addressing permitting delays will be realized as a goal.

Mitigation Hierarchy and Offset/In-Lieu Payments

In considering the more involved aspects of the proposed changes, we applaud efforts to ease uncertainty and delays in natural resource permitting as we see its positive implications for our members in their delivery of much-needed homes for British Columbians.

Although consistent application of the mitigation hierarchy may contribute to this goal, we have several concerns with the proposal to require proponents to *“demonstrate how all steps [of the mitigation hierarchy] were considered in their applications”*. Prior to adding this as a requirement, **we recommend the Province develop guidance documents and checklists** to clarify what the Province considers to be satisfactory consideration of each level of the hierarchy and what would be required for proponents to demonstrate these steps. We would also **support a phased implementation schedule and in-stream protections for ongoing projects** to mitigate any disruptions this added requirement may cause.

Further, we understand that offset payments are a common feature of mitigation hierarchies as implemented in other comparable jurisdictions within and beyond Canada. **We urge government to prioritize predictability and economic feasibility** in devising any such payment scheme for wetlands. Namely, any offset payments should be determined at set-out

rates within a policy, rather than determined or negotiated on a project-by-project basis. These payments could be tiered based on key considerations such as the size of the project. Cost certainty is critical for housing projects as financial commitments are made early and are difficult to adjust later in the approvals process.

Therefore, **we strongly urge that further, targeted consultation with the building and development sector be undertaken** prior to fees being set to ensure they are economically feasible and to mitigate the potential impact of such payment schemes on inhibiting the delivery of housing. We would also **recommend the Province undertake an economic feasibility analysis to determine appropriate rates.**

Reliance on Qualified Professionals

The CHBA BC supports this and other recent efforts on the part of the government to increase reliance on qualified professionals with the aim of streamlining the permitting process. To that end, we are supportive of the Province's proposal to "*define 'Qualified Professional' (QP) for wetland-related work under the WSA*", as a step towards greater reliance on QPs. When defining these requirements, **CHBA BC recommends the Province not make the definition too narrow so as to limit the number of QPs that would qualify.**

We would also **recommend the Province create an established registry of qualified professionals** to minimize duplication of work for proponents that have engaged QPs not within the Province's definition.

Closing

We would like to once again express our thanks for undertaking this important work and for the opportunity to provide input. Efforts to streamline permitting and reduce redundancies in natural resource permitting are a welcome step that will help builders deliver **more homes for people** across the province.

Sincerely,



Jenny Scott,
Director, Policy and Government Relations

cc: Hon. Randene Neill, Minister of Water, Land and Resource Stewardship
Hon. Christine Boyle, Minister of Housing and Municipal Affairs