

November 14, 2025

VIA EMAIL

Honourable David Eby
Premier, Province of British Columbia
PO BOX 9041
STN PROV GOVT
Victoria, BC V8W 9E1

Dear Premier Eby:

RE: *Bill M216 Professional Reliance Act* – Planning Institute of British Columbia Preliminary Comments

I am writing as President of the Planning Institute of British Columbia (PIBC), which represents close to 2000 members across British Columbia and the Yukon, to offer preliminary comments on *Bill M216 – Professional Reliance Act*, which is currently under consideration by the Legislative Assembly. We appreciate MLA George Anderson meeting with PIBC staff and representatives of PIBC's Policy & Public Affairs Committee on November 10, 2025, to review and discuss the proposed Bill that he introduced. We appreciate and share Mr. Anderson's overall goal to appropriately accelerate the expansion of housing supply in communities across the province through potential improvements to the development approval and review processes, while ensuring good process and safeguarding the public interest. We further appreciate MLA Anderson's interest in feedback and input on the proposed Bill.

Bill M216 Professional Reliance Act

PIBC acknowledges the Province's efforts to expand housing supply through recent legislation. PIBC's Peer Learning Network – funded by a generous 2023 contribution from the Province of BC – is successfully supporting Registered Professional Planners and other practitioners in complying with and implementing legislation affecting proactive planning, small-scale multi-unit housing, housing in transit-oriented areas, development financing, and inclusionary zoning. Through the Peer Learning Network, and in consultation with the Ministry of Housing and Municipal Affairs, the Institute has learned that engaging Registered Professional Planners and practitioners is the best way to share and advance best practices and ideas, and to make continuous improvement to planning regulations and practices.

In this context, and through our meeting with MLA Anderson, PIBC offers the following preliminary comments and recommendations regarding *Bill M216*.

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1. *Bill M216* appears to be inconsistent with Certified Professional Programs already being implemented by local governments to streamline building and occupancy permit processes.

Stemming from our November 10, 2025 meeting with MLA Anderson, it is our understanding that *Bill M216* is intended to reflect and expand on Certified Professional (CP) programs currently being implemented by an increasing number of local governments. Generally, CP programs allow building permit applicants to hire a CP to support processing building permit applications. A CP is an independent third-party who is either a registered architect or professional engineer with advanced training in fire safety, life safety, and accessibility provisions of the *BC Building Code*.

What is important to note is that local government CP programs are restricted to the building permit and occupancy permit review and approval process, and they are designed to help both the applicant and/or the local government. For example:

- City of Vancouver¹: “The Certified Professional (CP) program facilitates the issuance of building permits for new or existing buildings by allowing certified professionals to take on the full review and inspection role on behalf of the City.”
- City of Maple Ridge²: “The Certified Professional program offers a voluntary alternative route for obtaining building and occupancy permits for large, complex builds...helping to streamline the approval process while ensuring the highest safety standards and conformity with the British Columbia Building Code. The Program allows applicants to hire a CP to assist with the City’s building permit review and approval process...CPs can support both the applicant and City building officials by providing impartial design review, advice and recommendations to ensure a project’s design and construction comply with the Building Code, the related development permit and other relevant safety enactments.”

In contrast, as drafted *Bill M216* would appear to nullify one of the purposes of CP programs – for CP to take on the review and inspection role on behalf of the local government – by prohibiting a local government from undertaking peer reviews unless specifically authorized by the Superintendent of the Office of Professional Governance. Secondly, and perhaps of greater significance, the scope of *Bill M216* goes above and beyond the building permit and occupancy permit process to the wider and more complex development approval process, thereby introducing potential adverse risks to housing development.

¹ <https://vancouver.ca/home-property-development/certified-professional-program.aspx>

² <https://www.mapleridge.ca/build-do-business/construction-development-permits/certified-professional-program>

2. The scope of *Bill M216* is unnecessarily broad, thereby potentially creating adverse risks to the public interest and to planning practice.

The current scope of *Bill M216* is too broad. The scope may cover rezoning applications, development permit applications, temporary use permits, etc. These types of non-building permit applications greatly benefit from the involvement, if not oversight and coordination, of Registered Professional Planners and other diverse, relevant professionals, whether on the side of the applicant or on the side of the local government to ensure alignment and consistency with policy and guidelines (land use, design, heritage, environmental, transportation).

However, *Bill M216* may displace or diminish the role of Registered Professional Planners, who are not currently regulated under the *Professional Governance Act (PGA)*. Registered Professional Planners ensure work prepared by architects, engineers, biologists, surveyors, and other relevant professionals is coordinated, aligned and integrated. The additional risk is whether current PGA-regulated professionals are suitably positioned within their designated scopes of practice to undertake planning practice in respect of the development application review and approval process. In sum, there is considerable potential adverse risk to the public should *Bill M216* be enacted in its current form.

3. *Bill M216* is likely to introduce significant uncertainty and delays to new housing development

Bill M216 as drafted requires any dispute arising between a PGA professional employed by a local government and a PGA professional retained by an applicant to be referred to the Office of the Superintendent of Professional Governance (OSPG) for resolution. Based on our current understanding, the OSPG mandate and mission, as set out in the PGA, does not contain any provisions relating to resolving local government planning, development, building permit, or occupancy permit application disputes between PGA regulated professionals. The OSPG does not appear, at present, to have the capacity and unique professional subject matter expertise to adjudicate such disputes across the 188 local governments in BC.

Moreover, we are not aware of any other existing quasi-judicial entity in British Columbia that currently has a mandate, mission, and staff expertise to receive and resolve local government planning, development, building permit, or occupancy permit application disputes between an applicant and a local government.

Even if a new quasi-judicial entity were enacted or the powers of such is endowed on an existing professional regulatory body the net effect would likely be longer delays for new housing development approvals, further exacerbating the housing crisis.

For the reasons stated above, PIBC strongly recommends that *Bill M216* be carefully reviewed and discussed in open forums with relevant stakeholders, including PIBC, to ensure it is appropriately scoped and analyzed for potential risks, implications and effects before proceeding to second reading and potential adoption. The risk of not undertaking a full due diligence review is severe harm to the public interest.

We want to conclude by applauding MLA Anderson's passion and intuition about the need to expand the housing supply on a much quicker pace and scale. As recent years have shown, charting new zoning rules and proactive planning can help set the stage for new housing, subject to economic cycles and other considerations. But a necessary key to success is ensuring each and every new piece of legislation or regulation fits within the broader mosaic of policies and regulations.

In closing, we would like to take the opportunity to offer the Institute's assistance in providing support and insight to the Government, MLA Anderson and your colleagues on reviewing and refining *Bill M216* and related planning and housing-related legislation and policy. PIBC stands ready to offer our members' professional planning expertise and assistance to successfully and effectively advance housing delivery.

Thank you for your time.

Sincerely,



Kenna Jonkman RPP, MCIP
President, Planning Institute of British Columbia

CC: MLA George Anderson, Parliamentary Secretary for Transit
Honourable Christine Boyle, Minister of Housing and Municipal Affairs
Honourable Jessie Sunner, Minister of Post-Secondary Education and Future Skills
Kate Haines, Superintendent of the Office of Professional Governance and Office for International Credential Recognition
MLA John Rustad, Leader of the Conservative Party of British Columbia
MLA Jeremy Valeriote, BC Green Party
Narissa Chadwick RPP, MCIP – Chair, PIBC Policy & Public Affairs Committee
Deborah Jensen RPP, MCIP – Chair, PIBC RPP Regulation Subcommittee
Dave Crossley, PIBC Executive Director

Background about the Planning Institute of British Columbia

The Institute is the self-regulating professional association of professional planners in BC and the Yukon – currently numbering about 2000 members. PIBC is incorporated under the *Societies Act of BC* as a “Division 2 – Occupational Title Society”. Certified PIBC members use the protected title “Registered Professional Planner” and “RPP” designation and are permitted to use “MCIP” to indicate national membership with the Canadian Institute of Planners – the national association to which PIBC is affiliated.

PIBC’s mission is to support, connect, and advance the planning profession in BC and the Yukon through certification, ethical standards, education, and advocacy. The 11-person elected Board determines institute policy and strategic direction. PIBC bylaws address qualifications for membership, institute administration, continuous professional learning and professional conduct and discipline. A *Code of Ethics and Professional Conduct* establishing core standards is incorporated in the bylaws and upheld by PIBC.

The Planning Profession

Planners work throughout British Columbia, the Yukon, and beyond, in large urban centres, suburban communities, and rural and remote communities and regions. Planning is a multidisciplinary field with practitioners in the public and private sectors, as well as in academia and the non-governmental sectors.

The scope of planning generally revolves around land use and covers diverse areas of practice and specialization such as housing planning and policy, transportation planning, resource management planning, environmental planning, social policy and planning, and population and employment forecasting – among many areas of professional practice.

What sets planning apart from other professions is the overarching ethos to uphold the public interest, actively seeking out to understand and balance the goals of a multitude of stakeholders, recognize the interplay between the built and natural environments, and to ensure a future-oriented perspective on building resilient, livable, and equitable communities.

In practical terms, planners take on a variety of tasks, such as:

- Coordinating and working alongside professional practitioners from many different specialized disciplines, such as architects and engineers, in addition to working with the public, proponents, stakeholders, and decision-makers through planning and development processes
- Convening and facilitating dialogues with land developers, local government officials, other professionals, and citizens; and,

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- Undertaking technical analysis of demographics and transportation demand; preparing plans and policies that comply with laws and regulations; and, providing independent professional advice to decision-makers and clients.

Partnerships in Housing

PIBC has been proudly designing and delivering the Peer Learning Network from a one-time contribution by the Province. Through monthly coordination meetings with Ministry of Housing and Municipal Affairs staff, PIBC has delivered focused and practical offerings to both members and non-members. Upcoming offerings include Housing Advisory Bulletins and the Pilot Intelligent Inventory of Official Community Plans and Zoning Bylaws. The key takeaway from the Peer Learning Network program is that continuous improvement should be pursued in part by building on established legislation and regulations, and strengthening partnerships between public, private, and non-profit actors.

PIBC looks forward to opportunities to strengthen this partnership with the Province to deliver timely knowledge transfer and innovative research to planners and practitioners working in housing and related matters so that more housing can be delivered faster without compromising safety.