

How the Development Lobby Captured Local Government Urban Planning with the Recent Housing Bills in British Columbia

And why it is crucial that the public regain control over the future of their communities.

Presentation for 2025

By Sasha Izard

Articles and Resources at

<https://crdwatch.ca/index-of-articles-revealing-major-lobbying-influence-on-b-c-provincial-housing-bills-and-housing-targets/>
<https://sashaizard.com/articles>

What is the Development Lobby in British Columbia?

This is not a simple question. The development/real estate lobby in British Columbia has excelled at hiding itself behind a wall of non-governmental organizations e.g. non-profits/NGOS, and with a vast smoke screen of dissembling about itself.

Shocking Fact: There is no definition of “lobby” as a noun in the so-called Lobbyists Transparency Act (LTA) in British Columbia.

While the Province does not identify lobbies as distinct entities, thus providing plausible deniability in its intensely intertwined dealings with them, it does identify “lobby” and “lobbying” (verbs) as activities in the LTA that require registration, and it also defines “organization” in the LTA, but to add to the confusion, insists that “Lobbying Organization”, is not a “compound noun” defined in the LTA.

Confused?

Yes, that seems to be entirely the point. Lobbies in Canada do not like to be identified as such, and the government at multiple levels doesn't want them to be identified as such as well.

Why? I think the answer rests in that they often work together hand-in-hand, and this disguises conflict of interest issues that arise from the enmeshed relationships between the government at all levels and organizations that are lobbying it.

This also disguises that the public aren't really in the driver's seat in a supposed democracy much of the time, but are rather often sidelined to the passenger's seat, and we are as a result stuck watching the ride unfold as passive observers, or distracted non-observers; which for many in power and those influencing them behind the scenes is very convenient. Many have worked hard over many years to achieve this state.

The Players

- 1. The Urban Development Institute (UDI): The most powerful development and real estate lobbying organization in British Columbia.**
2. The Canadian Homebuilders Association (CHA) and its various local branches.
3. The Urban Land Institute (ULI)
4. A plethora of others, including non-profits/NGOs, art/architecture organizations, consulting companies, various residential builders and real estate associations, those pushing a political development agenda as third-party electoral organizations, various corporations/corporate entities including those involved in investment and finance, and even student organizations being used by the development industry to advance their agenda/projects, also by post-secondary institutions themselves.
5. Numerous Boards of Directors in various organizations, including those mentioned, which have a significant presence (sometimes even a controlling one), by those involved in the development/real estate industry and their lobbies.
6. The Government at all levels. The government at all levels is funding various organizations lobbying them, and working with them to achieve much the same ends (as were lobbied to them initially and ongoingly) by 'outside' interests.

The Focus of the Presentation

The Urban Development Institute (UDI)

Reason: It is the most powerful/politically influential organization representing development/real estate interests in the Province, as they themselves have admitted previously.

Conflict of interest concerns:

The government itself is a paying member of the UDI, by numerous branches of government including both local and regional governments, crown corporations and statutory entities, etc., that are paying members of the UDI. Seldom are these membership joins ever voted on by elected officials. They most often take place in the back rooms of planning departments, unbeknownst to members of the public and even often unbeknownst to the elected officials themselves.

The government and various branches of it fund the UDI in numerous ways including by grants, and by paying for both elected officials and BC public servants under the guise of 'professional development' and 'networking opportunities', to attend UDI functions. This is what I call reverse lobbying subsidized by the taxpayer, as opposed to traditional lobbying, which was funded exclusively by the private sector.

4 municipalities on Vancouver Island and the Regional Government the CRD after 23 years of membership, as well as the federal crown corporation the CMHC, have pulled their paid memberships from the UDI over the last 2 years.

The UDI has been hiding its members directory, which includes its government members from public view since November 21, 2023.

Almost all of the dozens of governmental memberships in the UDI are not publicly listed by the government and various crown corporations etc., have attempted to evade admitting that they have paid memberships in the UDI.

The UDI sets up untransparent backroom committees that work with the government, known as liaison committees or issues committees. The UDI is now hiding its extensive list of committees that meet with the government.

Primary sources of information for the presentation:

Freedom of Information enquiries, BC Lobbyist Registry entries, in addition to the UDI's own information released about itself (now much of it hidden), has revealed that what the UDI lobbied for, culminated in the Housing Bills in British Columbia, in addition to other controls at various levels of government that force their agenda at the local government level e.g. through mandated housing targets and other control mechanisms, which operate in-tandem with the recently introduced Housing Bills.

The following diagrams are those that I made in November of 2023 and updated subsequently.

To provide context, in November of 2023, the Province was ramming through Bills 44, 47 etc. in the Legislature.

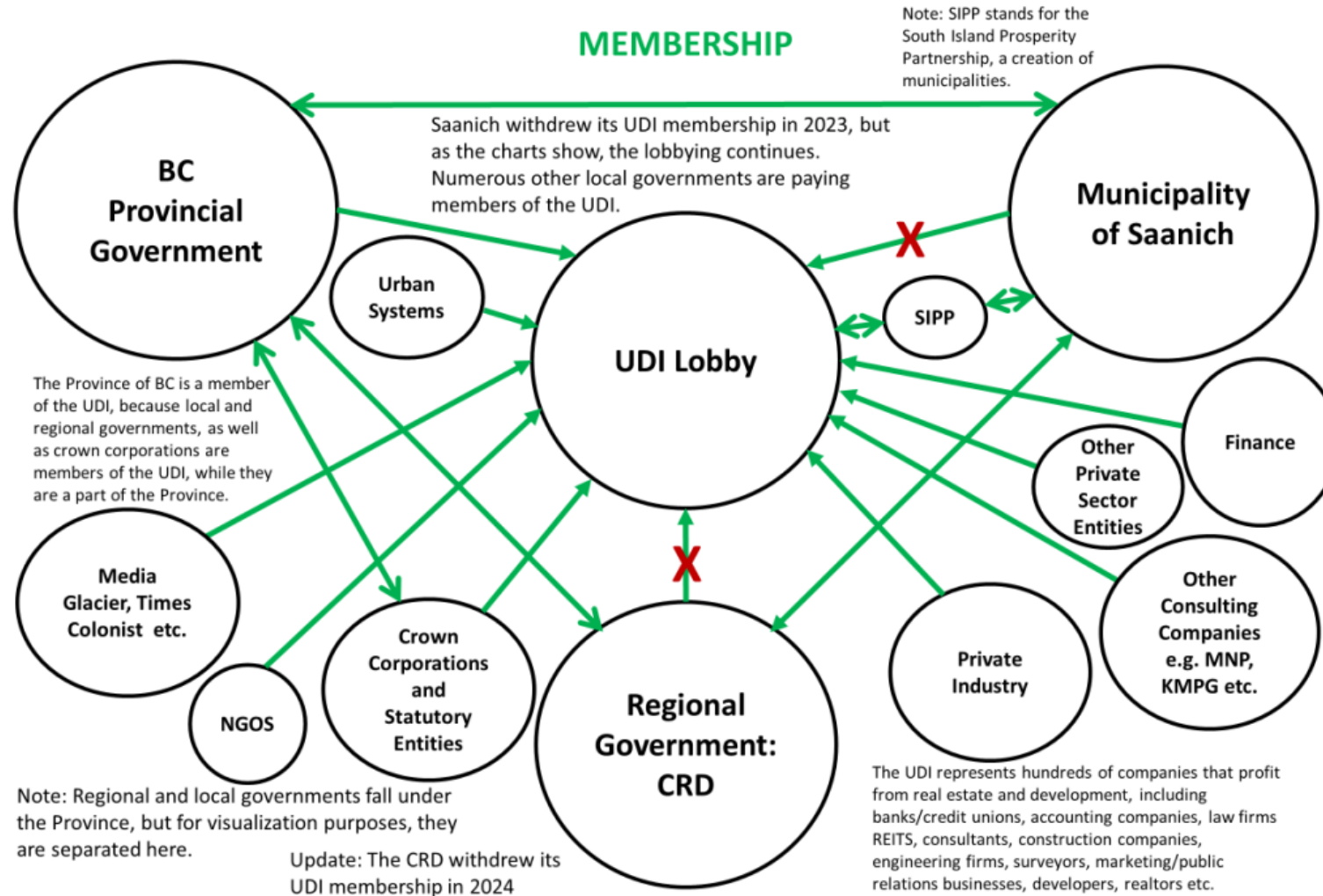
The diagrams show a Southern Vancouver Island perspective, but keep in mind that much the same perspective is mirrored in Metro Vancouver.

For those looking for a visualization of the content and numerous overlaps involved with the content discussed, the following diagrams are for the purposes of visual aids to this article.

The following diagrams depict the relation between:

The Government of BC, the UDI lobby and Urban Systems in the Creation of Mandatory Housing Targets and the Waiving of Public Hearings and other projects in order to mold the zoning process (Yes, it does get complicated). I've utilized local examples to show how this is operating on a local level, but this may illustrate a microcosm of a macrocosm happening in numerous places across the province.

Visualization of the Relation Between the UDI Lobby, Urban Systems and the Government of BC in the Creation of Housing Targets & the Waiving of Public Hearings, in Order to Mold the Zoning Process

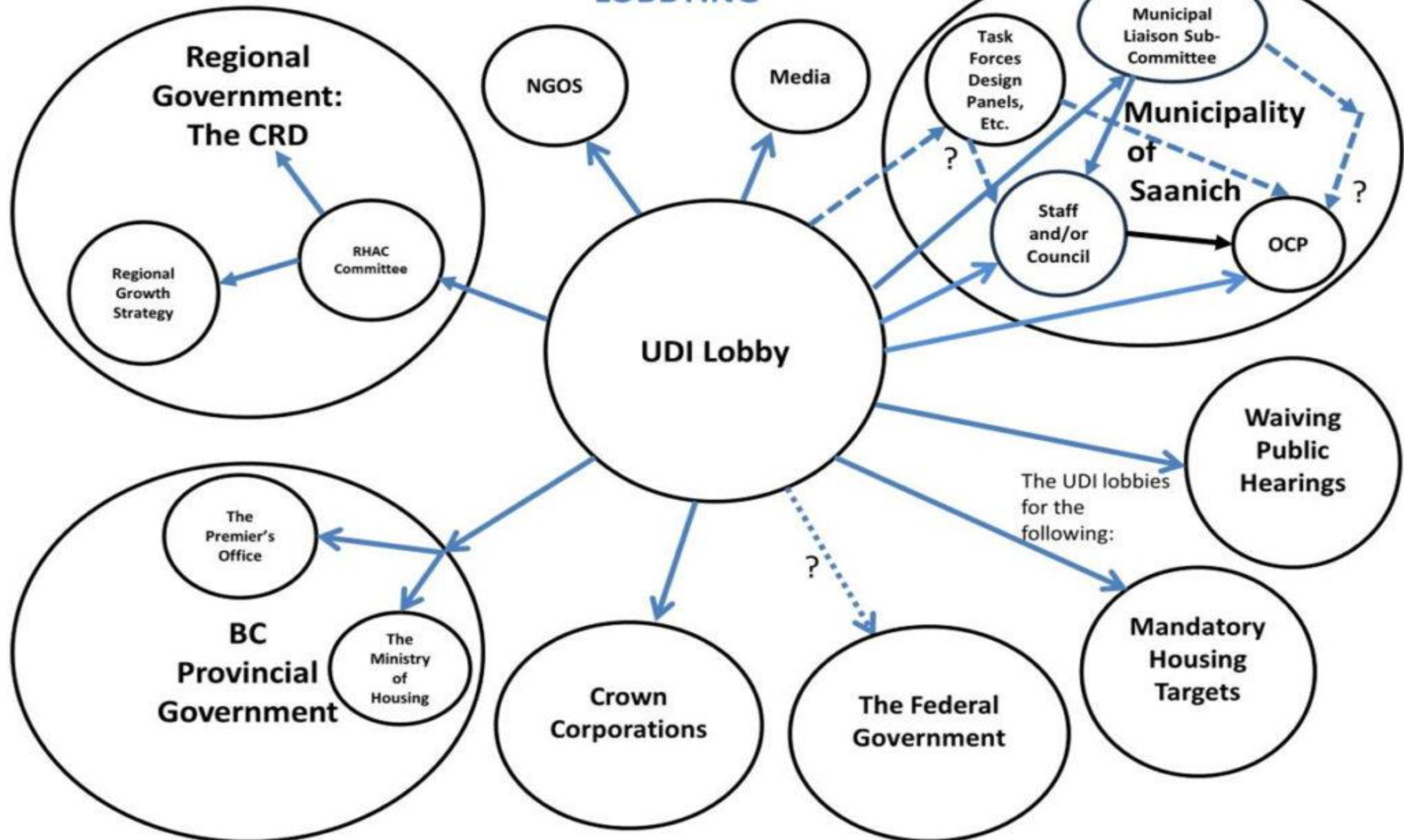


Membership:

UDI membership extends not only to private industry and finance, but also to both governmental and non-governmental entities (NGOs). Governmental entities include crown corporations, statutory entities, regional government and dozens of local governments across BC.

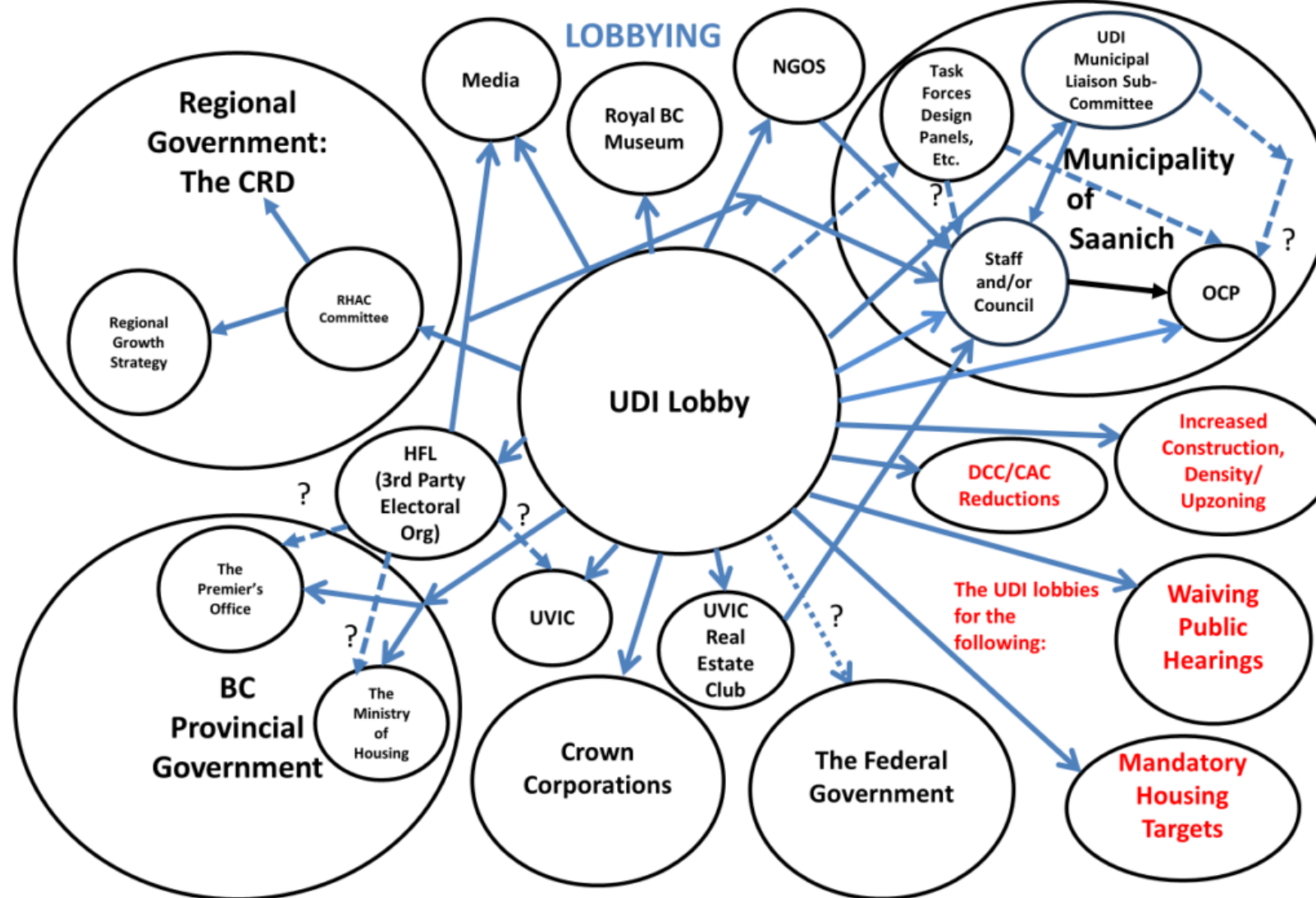
Visualization of the Relation Between the UDI Lobby, Urban Systems and the Government of BC in the Creation of Housing Targets & the Waiving of Public Hearings, in Order to Mold the Zoning Process

LOBBYING



Same diagram with added complexity:

Visualization of the Relation Between the UDI Lobby, Urban Systems and the Government of BC in the Creation of Housing Targets & the Waiving of Public Hearings, in Order to Mold the Zoning Process



A Galaxy of Lobbying Activity:

The web of UDI lobbying and influence is extensive. The UDI refers to this web of lobbying under the euphemism of “networking” and offers “networking” as a benefit of membership, including to government staff and elected officials. This chart can only offer a mere snapshot of some of the overarching categories that are being discussed in this article. UDI influence goes out in numerous directions, in the hope that this will return in the form of favourable policies and coverage that are desired by the industry members that it represents.

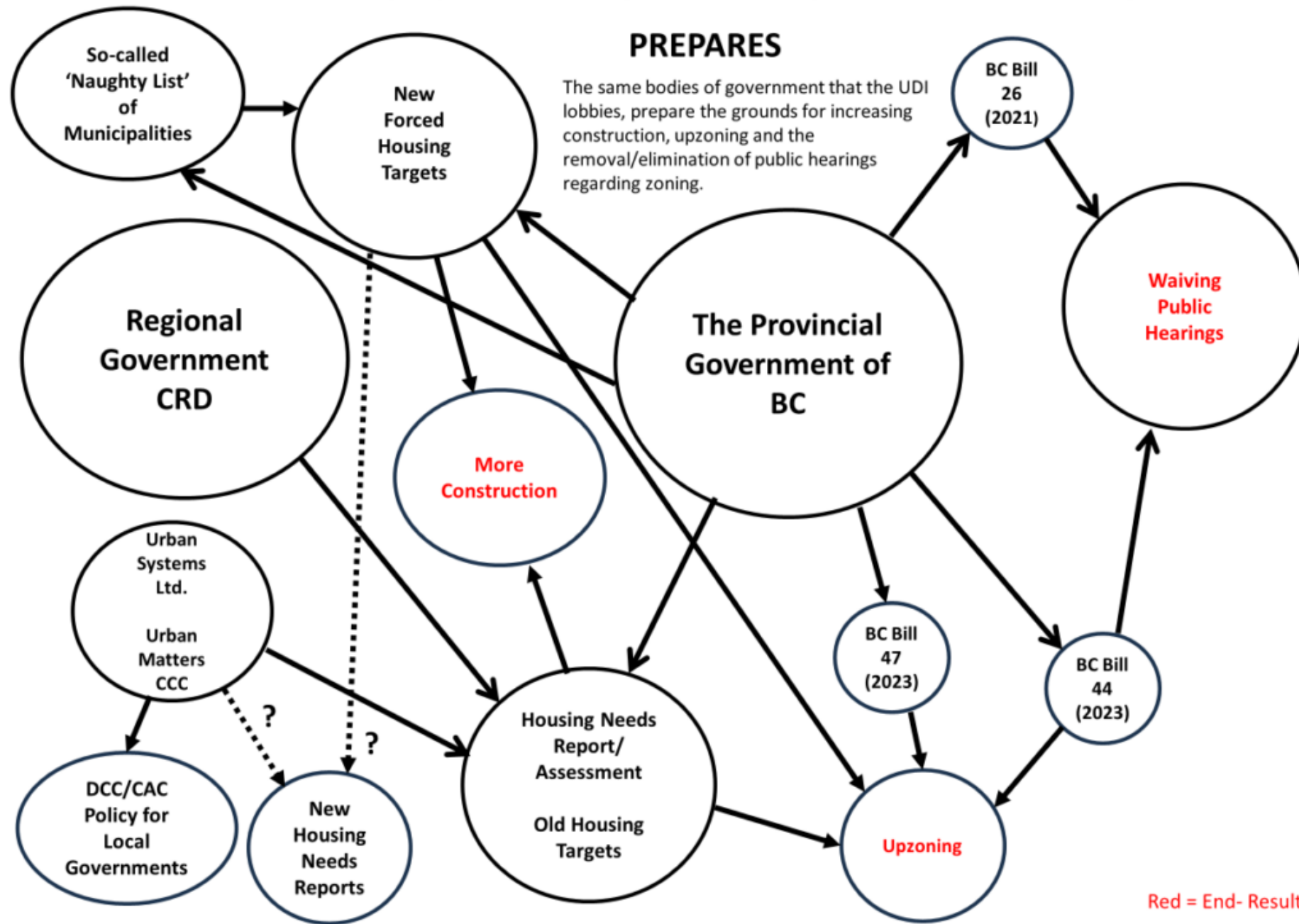
Dotted lines with question marks represent undetermined information. Does the UDI lobby the federal government? Various statements that the lobby has made indicate that this is very likely to be the case, but no one that I am aware of has found an active registration for federal lobbying, although an inactive registration from 2005 has been found.

Whether or not Saanich’s UDI-Municipal Liaison Sub-Committee has been lobbying for changes to the Official Community Plan of Saanich (OCP), although suspected, remains undetermined, as the meetings between the lobby and staff are unrecorded and the general public are not permitted to attend the meetings.

Have various Saanich Task Forces, Committees and Advisory Panels etc., been involved in lobbying staff and/or council on behalf of the UDI? This is a question well worth asking, as the presence of people with associations to the UDI either directly (as in a UDI board member), or indirectly, as those working for UDI member companies is statistically very high. The Saanich Housing Strategy Task Force ([which was nicknamed a “Stakeholder Taskforce” by the press](#)) for example, has had more than a third of those on the task force (not including elected officials) having such associations.

In addition, in looking at what the Saanich Housing Strategy Task Force has been advocating to Saanich (e.g. the Neighbourhood Homes Study for example,) many of the items e.g. ‘missing middle’ appear notably similar to what the UDI has included in their 2022-2023 “annual report” in their “advocacy initiatives” aimed at Saanich. According to the minutes of a CRD RHAC Committee (mentioned elsewhere in the article), the executive director of the UDI Capital Region was promoting advocating and lobbying for items like missing middle to the other committee members, whose numerous connections to the UDI have been mentioned in this article.

Visualization of the Relation Between the UDI Lobby, Urban Systems and the Government of BC in the Creation of Housing Targets & the Waiving of Public Hearings, in Order to Mold the Zoning Process

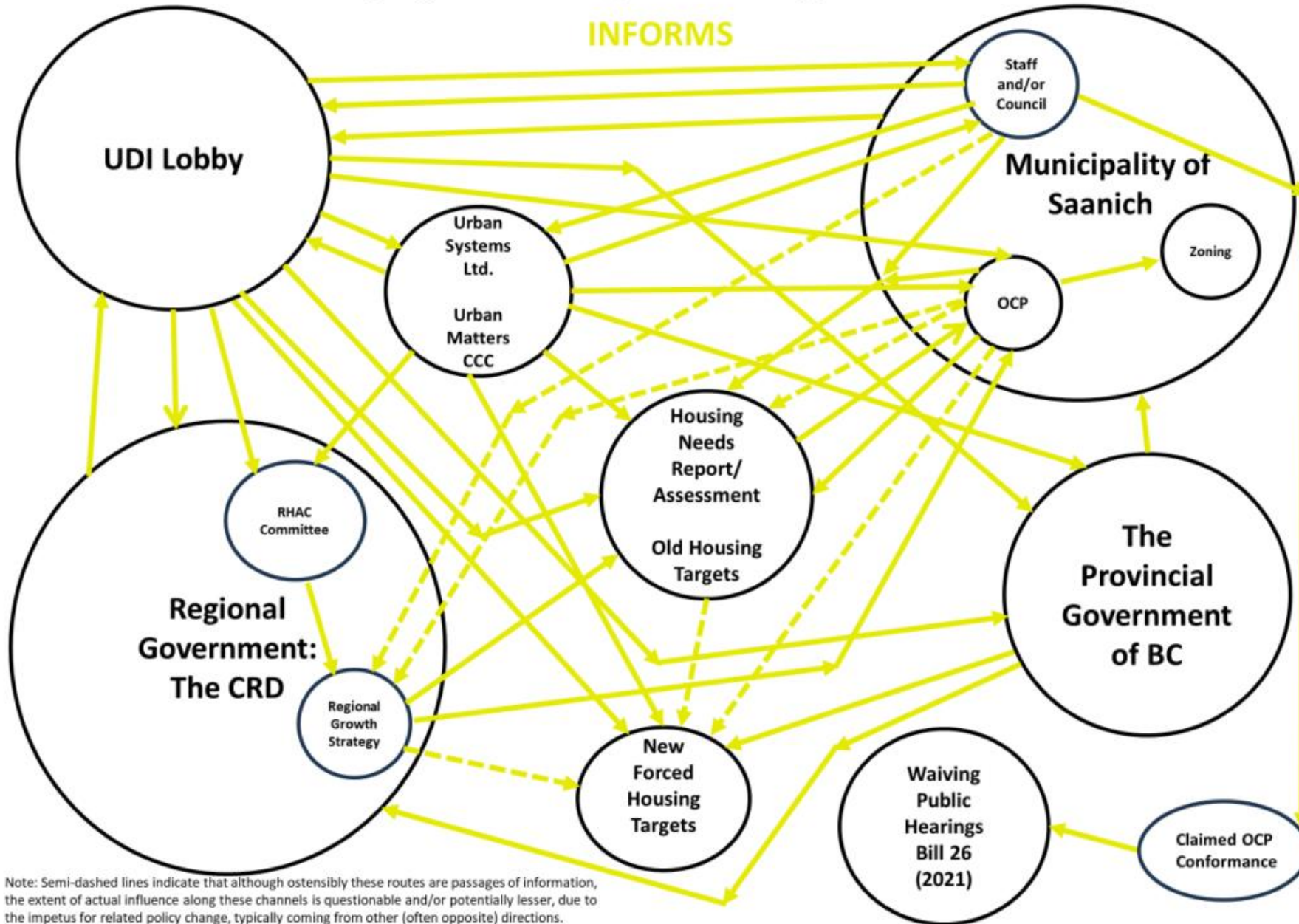


- **Preparation:**

Upon the government being lobbied by the UDI on numerous subjects related to housing policy, levels of the government draft new policies that affects these areas. Often present to help various levels of government in the preparation of policy and implementation in the form of advice, analyses, consultation and helping to draft policy documents, is the UDI's member company Urban Systems, with its subsidiary Urban Matters.

The end-result of this process of policy preparation and implementation has often been policies that can be seen as favourable to the UDI's paying members from private industry and finance, who have vested interests in increasingly profitable outcomes from city planning. Such favourable outcomes include: more construction, the limiting of public input in the zoning process (that can potentially limit profits) and upzoning, which can drastically increase profits for speculators/investors, including Real Estate Investment Trusts (REITS). Investors poised to potentially benefit, include not only UDI members from private industry and finance, but also governmental and non-governmental investors that may or may not also be UDI members. Governmental investors that stand to potentially benefit on a vast scale from housing policy changes, include most notably government pension funds that have invested billions of dollars into real estate investments and have grown increasingly reliant on them to sustain themselves.

Visualization of the Relation Between the UDI Lobby, Urban Systems and the Government of BC
in the Creation of Housing Targets & the Waiving of Public Hearings, in Order to Mold the Zoning Process



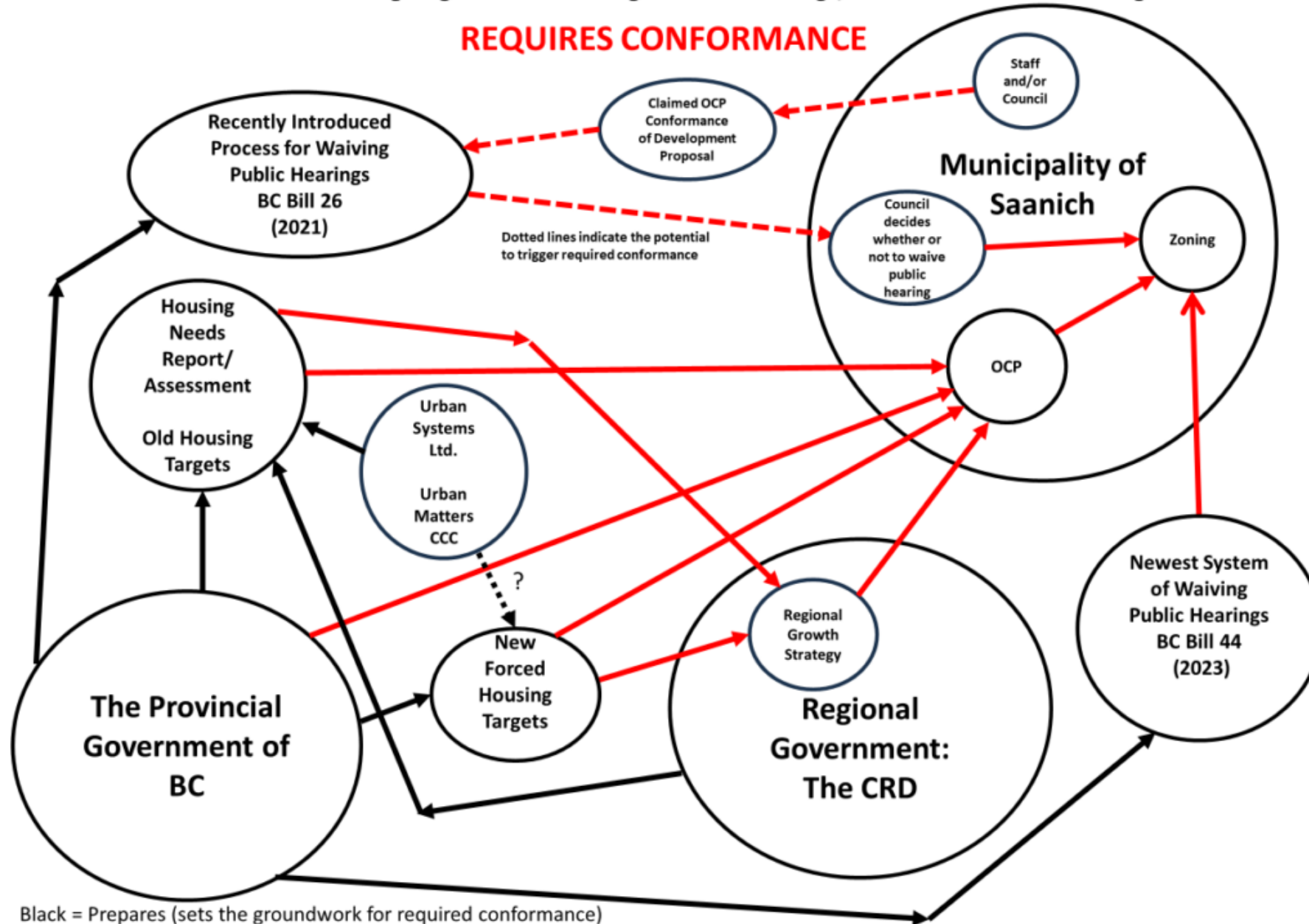
- **An Elaborate System of ‘Informing’ Multiple Levels of Government On the Formation and Implementation of Housing and Zoning Policy.**

The UDI and its member company Urban Systems, have extensive networks in place, to inform numerous branches of government on housing and other policy, related to urban planning.

After writing this article and creating the diagrams that help illustrate this web of governmental informing, I found statements from the UDI Capital Region’s executive director from their public presentation at the September 12, View Royal Committee of the Whole, that describe how the UDI see their role as governmental informers. I’ve condensed the text for the purposes of understanding here. [The original full verbatim quote from the executive director can be seen in the appendix to another article that I wrote, by clicking on this linked text.](#)

- *“We [UDI] pride ourselves on working collaboratively with all levels of government by sharing information and working together”*
- *We do extensive policy work, [...] and this is where we look at informed changes across all levels of government. [...] We try to align the [...] policies, that are being [...] brought forward by the federal government, the provincial government, and the municipal government, and to kind of help them align, so that they don’t [...] collide with each other. [...] So, we’re working with the province and the Feds, mainly the province on [...] a variety of [...] different policies”*
- Referring to UDI-municipal liaison committees:
“Um, and basically what it is, is it’s uh, UDI representatives get together with the directors of the develop or the departments that work directly with development, and we exchange information and we help the municipalities out by creating working groups that can inform and, and help make decisions, uh for your policies.”

Visualization of the Relation Between the UDI Lobby, Urban Systems and the Government of BC in the Creation of Housing Targets & the Waiving of Public Hearings, in Order to Mold the Zoning Process

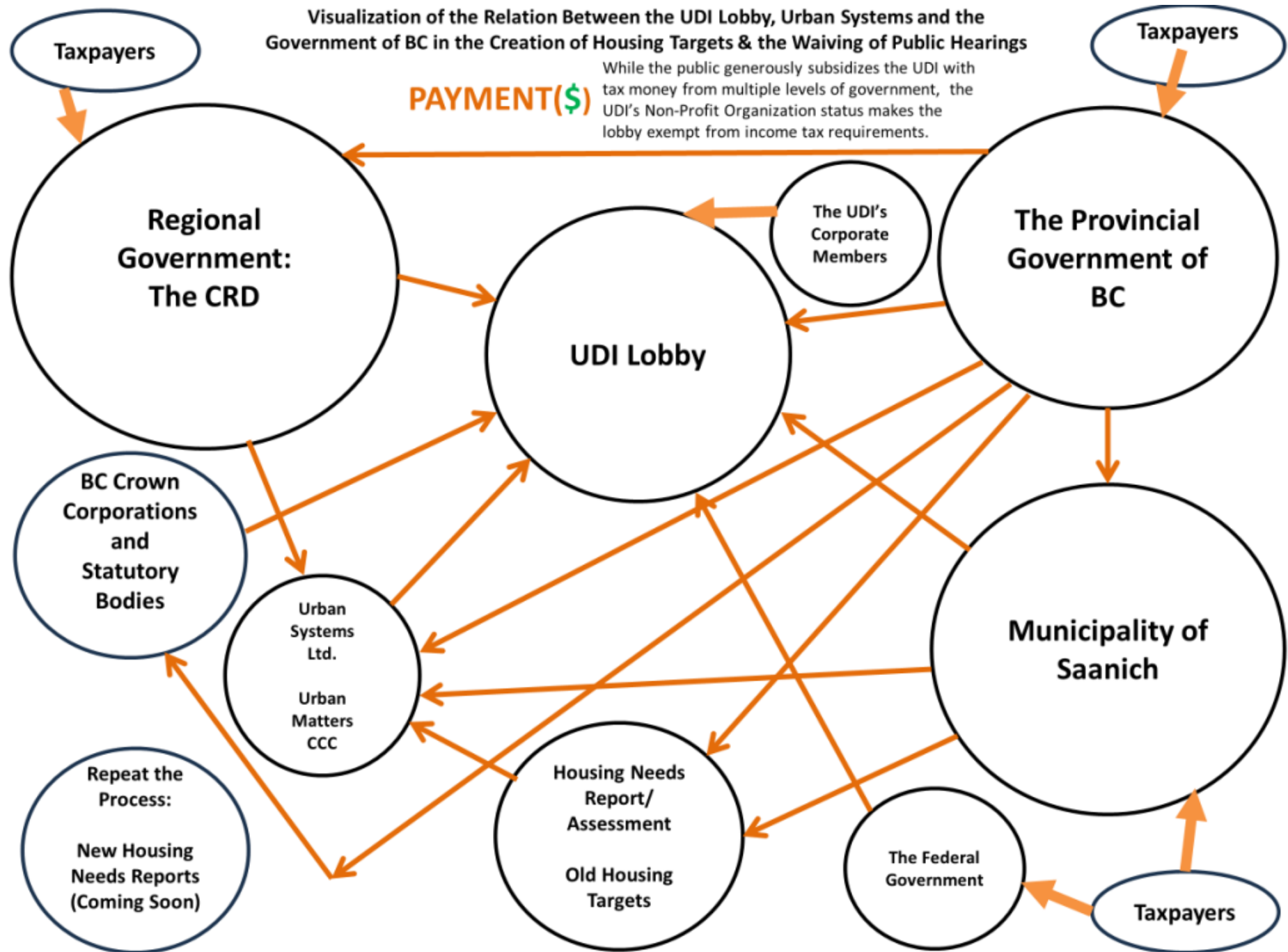


Mission Accomplished: Government Conformance Mandated

As a result of a combination and process of lobbying, informing, and both governmental and private sector preparation; new mandates are brought forward that require the conformance by levels of government in the creation of “official community plans” that are legally binding thus requiring conformance in zoning policy, and eventually in procedure as well, through required public hearing waivers (Bill 44). This could be considered a form of Regulatory Capture that takes local government power out of the hands of residents, and replaces it with an agenda provided by industry.

Visualization of the Relation Between the UDI Lobby, Urban Systems and the Government of BC in the Creation of Housing Targets & the Waiving of Public Hearings

While the public generously subsidizes the UDI with tax money from multiple levels of government, the UDI's Non-Profit Organization status makes the lobby exempt from income tax requirements.



Payments:

While lobbying, influence and information goes out from the UDI and its member Urban Systems toward the various levels of government (as shown in previous diagrams); and as the power of residents over the future of their districts decreases, payments from all levels of government (derived from taxes) flow back in the direction of the UDI and Urban Systems, helping to both subsidize, further advance, and continue the cycle of publicly subsidized lobbying.

Slides from the UDI's March 10, 2022 lobbying presentation provided to David Eby, when he was the Attorney General and Minister Responsible for Housing.

- On March 10, 2022, the UDI Executive Committee, provided a lobbying presentation and accompanying lengthy lobbying letter to David Eby.

The following are some slides from that presentation, as revealed by Freedom of Information (FOI).

The Agenda for the March 10, 2022 Meeting between the UDI Executive Committee and David Eby.



URBAN DEVELOPMENT INSTITUTE – PACIFIC REGION
#1100 – 1050 West Pender Street
Vancouver, British Columbia V6E 3S7 Canada
T. 604.669.9585 F. 604.689.8691
www.udi.bc.ca

Agenda – March 10, 2022

1. Welcome and Chair's Remarks
2. Hon. David Eby, Attorney General, Minister Responsible for Housing
 - 2.1. **Updated Polling Data**
 - Presentation on updated polling results from Stratcom
 - 2.2. **Implementing Housing Targets**
 - UDI Presentation and Memo (p.2)
 - 2.3. **Ontario Housing Affordability Task Force Report**
 - Discussion and Memo (p. 20)
 - 2.4. **Draft Broadway Plan**
 - Comments on final draft

Title slide of UDI presentation to David Eby on March 10, 2022.

Implementing Housing Targets

UDI Executive Committee
March 10, 2022

UDI slide presented on March 10, 2022 to David Eby

Why Targets?

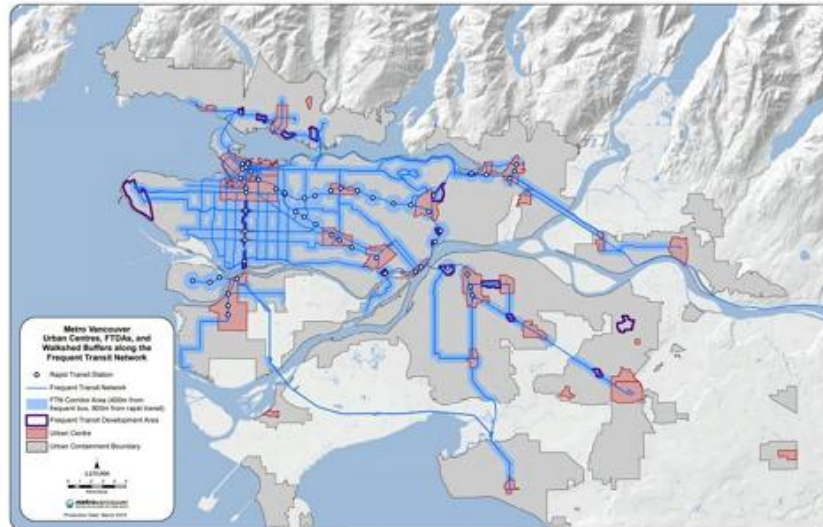
Putting Housing First

UDI recommends that the Province adopt performance-based targets rather than attempt to micromanage how local governments administer the wide-ranging number of issues in the development review process.

UDI slide presented on March 10, 2022 to David Eby



Once a global target has been established, municipal targets can be set based on current/future transit & regional restrictions.



UDI slide presented on March 10, 2022 to David Eby:

Implementing Housing Targets

Application Area

UDI recommends that for the initial phase, the housing targets apply within:

- *400 metres of SkyTrain stations, LRT stations; and*
- *200 metres of Bus Rapid Transit (BRT)/ RapidBus stops along Frequent Transit Corridors.*

Note: If the above slide looks eerily reminiscent of BC Bill 47 (2023), this is not a coincidence. The UDI is proud of its work that it did with the Province regarding the 2022-2023 housing bills.

UDI slide presented on March 10, 2022 to David Eby:

Implementing Housing Targets

Enforcement

UDI recommends a wide range of incentives and penalties if local governments do not achieve their targets, and a review period prior to the application of penalties.

Note: Yes, you read that correctly. The UDI prescribed to the Province harsh medicines for local governments that might dare to not go along with the UDI's agenda of forced housing targets along rapid transit corridors.

- The punitive stick approach to local governments, not approving enough construction as to be satisfactory to the UDI, could as suggested, involve for example, cutting infrastructure funding to local governments, or increasing taxes on those living around these areas:

The following excerpt is from the UDI's lobbying material:

With regard to penalties, the Ontario Task Force also recommends, "*Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets.*" UDI agrees, and this could include funding for infrastructure. TransLink and BC Transit, through regular reviews, could direct investments in bus routes, including the Frequent Transit Network and RapidBus services, to communities accepting more growth.

Transit Taxes

The regional property taxes that are used to fund transit services could be increased for those local governments that do not achieve their housing targets. This is justifiable because of the extraordinary investments made in those communities. If these investments are not being fully leveraged because of a lack of development, the regional taxes should increase to cover some of the additional operating and debt servicing costs that are being lost due to lower ridership revenues.

UDI slide presented on March 10, 2022 to David Eby:



Provincial Funding Mechanisms

- Creation of a *Housing Delivery Fund*
- Increase funding for capacity upgrades and digitization
- Reduction of funding for infrastructure and community amenities
- Reduction of transit service levels



Note: Yes, you read that correctly: the UDI proposed to the future Premier, the reduction of funding for infrastructure and community amenities, and also the reduction of transit service levels, as penalties to local governments that do not conform to their lobbied-for agenda. The UDI's inspiration for this was the Ontario Housing Task Force (bottom right of slide).

Excerpt of UDI slide presented on March 10, 2022 to David Eby

- Note: Their second prescription, as excerpted in the below slide, involved what certainly looks to have been none other than regulatory capture:



Enforcement

The Municipal Toolbox

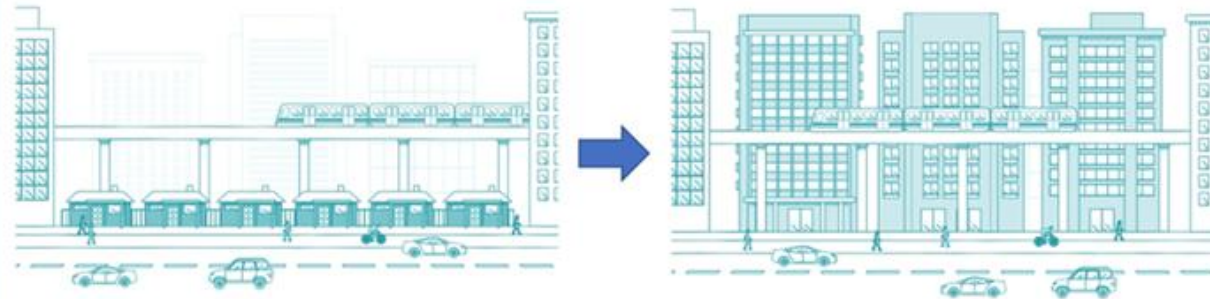
- Enhance the tools available to municipalities that meet housing targets and curtailing the regulatory powers of those who do not.

UDI slide presented on March 10, 2022 to David Eby:

Enforcement

Provincial Land-Use Decisions

- If housing targets are not met, the Province could assume the land-use decisions to pre-zone transit-oriented areas for housing.
- The intent is not to have to take these steps; it is to ensure that local governments themselves plan and allow an appropriate number of units.



- The province didn't just offer the threat to local governments as the UDI suggested, of the possibility of seizing land-use decisions from them. The Minister of Municipal Affairs at the time, proposed this to cabinet a month later with his April 14, 2022 Cabinet Concept Paper titled: **Provincial Intervention in Local Zoning to Allow More Homes**

The Province did exactly that 2 and a half years later with the housing bills (Bills 44 and 47) and it did pre-zone/upzone around transit-oriented areas, with what became Bill 47 with its Transit Oriented Development Areas (TODs) or Transit Operating Areas (TOAs).

A week previously, the Minister had received the following briefing from his ministry (Next slide):

**INFORMATION BRIEFING NOTE**

- Date:** April 7, 2022
- Prepared For:** Honourable Nathan Cullen, Minister of Municipal Affairs (MUNI)
- Topic:** Urban Development Institute (UDI) recommendation for province to establish housing targets and apportion targets to municipalities.
- Purpose:** To set out considerations and potential implications for implementing housing targets as per UDI recommendations, and identify linkages to current policy work being undertaken to meet similar outcomes.

BACKGROUND:

The Urban Development Institute (UDI) is a non-profit association of the development industry in British Columbia (B.C.). Its mandate is to promote efficient urban growth, good planning and development practices, transit investment, affordable housing, and high quality commercial and industrial developments. UDI is often invited to participate in provincial consultations as representatives of B.C.'s development industry.

UDI has developed a proposal with an overall recommendation that the province implement performance-based targets for housing units for municipalities, with an initial focus on areas within walking distance of transit. As discussed below, there are several significant challenges with the proposal.

This note provides an overview of UDI's recommendations, along with considerations and potential implications that would need to be taken into account in considering such a proposal. The linkages between UDI's proposal and current policy work being undertaken by MUNI as part of the Development Approvals Process Review (DAPR) is also discussed.

DISCUSSION:

- As the previous document mentions, it was prepared for Nathan Cullen, while he was Minister of Municipal Affairs.

The Cullen that begins to emerge from these documents, as head of the Ministry of Municipal Affairs is one that seems to have gone along far too comfortably with the direction the UDI was pressing the government to take, a direction the Ministry already appears to have been operating in line with and towards, but Cullen appears to have promoted that direction to levels unprecedented, as evinced by his subsequent Cabinet Concept Paper with a title beginning “Provincial Intervention in Local Zoning”, which contains the same conception that would ultimately be enacted through the passing of Bill 44, a conception that would radically override municipal powers over zoning across much of the Province.

As Minister of Municipal Affairs, Cullen and those under him were working towards many of the same objectives as the development and real estate lobby, whose hundreds of paying corporate members were making millions, if not billions of dollars from both internal and external sources, while housing prices skyrocketed in British Columbia, in particular in Vancouver and in the capital Victoria. They had a massive amount to gain from such policies becoming enacted by the Province by overriding municipal powers over zoning. It is difficult to imagine Cullen having been ignorant of this.

Amazingly from the Ministry, and for someone who should as Minister of Municipal Affairs be well versed on the world of real estate and development in British Columbia, and being in the position he was in, it is difficult to imagine that it would have escaped the Ministry’s and his notice that this background provided in the briefing that describes the UDI in glowing terms, does not mention [that they are a registered organization on the BC Lobbyists Registry](#) that actively lobbies the same government he had such a senior position in, in the interests of its paying corporate members involved in development and real estate. I would imagine though it wouldn’t have been necessary to tell him that, as he would already have known that full well. Why then was it necessary to provide a glossy explanation of what the UDI was in the first place?

Below is a copy of the UDI’s Lobbying Activity Report 3004-17730 on the BC Lobbyists Registry for lobbying activity dated to March 10, 2022, the same day that the UDI met with Eby, and about a month previous to the briefing paper for Cullen:

Subject Matter of the Lobbying Activity

Specific Topics of Lobbying Communications	Intended Outcomes	Associated Subject Matters
Advocating for continued provincial investment in transit and transit infrastructure in large urban regions of British Columbia, and tying municipal housing targets to transit infrastructure funding.	<ul style="list-style-type: none"> Development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity 	Finances and Budgets, Municipal Affairs, Transportation
Advocating for the consideration of additional housing policy measures to increase the supply of housing including: housing targets in areas well-served by transit, more robust housing demand estimates linked to future planning processes, removal of parking minimums, and minimum allowable heights and densities in certain urban areas.	<ul style="list-style-type: none"> Development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity 	Housing, Municipal Affairs
Seeking increased Provincial engagement with municipalities regarding the provision of housing in areas of current and future transit investments.	<ul style="list-style-type: none"> Development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity 	Housing, Municipal Affairs
Seeking the expanded use of Transit Supportive Agreements to initiate on-street parking regulations in areas located near rapid transit stations.	<ul style="list-style-type: none"> Development, establishment, amendment or termination of any program, policy, directive or guideline of the government of British Columbia or a Provincial entity 	Housing, Municipal Affairs

Senior officer who filed this Lobbying Activity Report:

Anne McMullin

Organization:	Urban Development Institute
Associated registration:	1811-3004-42
Lobbying Activity date:	2022-03-10
Arranged a meeting:	No
Posted date:	2022-04-16

In-house lobbyists who participated in the lobbying activity:	<p>Jeff Fisher Michael Drummond Cassandra McColman Anne McMullin</p>
Senior Public Office Holders who were lobbied in this activity:	<p>Teri Collins, Assistant Deputy Minister Office of Housing and Construction Standards, Attorney General and Minister responsible for Housing</p> <p>Angela Cooke, Associate Deputy Minister Office Responsible for Housing, Construction Standards & Multiculturalism & Anti-Racism, Attorney General and Minister responsible for Housing</p> <p>David Eby, Attorney General and Minister Responsible for Housing Attorney General and Minister responsible for Housing</p> <p>Adam Lynes-Ford, Senior Ministerial Advisor Attorney General and Minister responsible for Housing</p> <p>Siân Madoc-Jones, Ministerial Advisor Attorney General and Minister responsible for Housing</p>



Ministry of
Municipal Affairs

s.13

Current work being undertaken by MUNI:

As part of the DAPR work, MUNI staff are reviewing current planning and land use tools – such as Official Community Plans and Housing Needs Reports (see below) – and approaches to planning to consider what changes may be required to, in part, meet the same desired outcomes of UDI’s proposals. This work considers issues raised as part of consultation undertaken with a variety of stakeholders, including UDI, developers, local government staff, and non-profit organizations, in the early phases of DAPR.

s.13

Note: The small s.13s in red text bottom left, indicates a form of government censorship. S.13’s basis in FOIPPA: “[Section 13](#) is a [discretionary exception](#) to the right of access to information. It permits public bodies to withhold information that would reveal advice or recommendations developed by or for a public body or a minister.”

- MUNI stands for the Ministry of Municipal Affairs. DAPR stands for the Development Approvals Process Review, which the UDI was consulted by the Province on as a stakeholder, and involved a significant amount of content that looked remarkably similar to UDI material over the years.
- Official Community Plans and Housing Needs Reports, meeting the same desired outcomes of the UDI's proposals? Working with stakeholders including the UDI and developers, local government staff etc.? Sound familiar?

One week after this information briefing to the Minister appeared, Cullen's name appeared once again at the top of the subsequent document which will be shown in the next slide.



Cabinet Concept Paper

Minister: Honourable Nathan Cullen

Ministry: Municipal Affairs

Date: 04/14/2022

Title: Provincial Intervention in Local Zoning to Allow More Homes
(Gentle Density)

Summary:

This paper explores the concept of and policy design work underway, with respect to provincial intervention in local government zoning to increase the allowable number of homes in single detached residential neighbourhoods (gentle density).

s.13

Proposed concept:

s.13

s.13

s.12, s.13

s.12, s.13

- Yes, Provincial Intervention in Local Zoning to Allow More Homes. It has a nice ring to it doesn't it? Don't let the addition of the term (gentle density) give you the wrong impression. What was being talked about in this document was not about allowing garden suites on single family home lots, but about significantly increasing the amount of housing on them.

What ultimately appeared in Bill-44, 2 and a half years later, was not gentle density, but an increase of up to 4-6 times the amount of housing units on single family home lots, without adequate environmental protections and infrastructure considerations in place. The instant upzonings would involve no public hearings, as per the bill. It is clear that these radical new policies rammed by through by the Province, without much in the way of public debate nor consideration, did not emerge out of thin air, but rather had already been coming down the pipe, with origins years earlier.

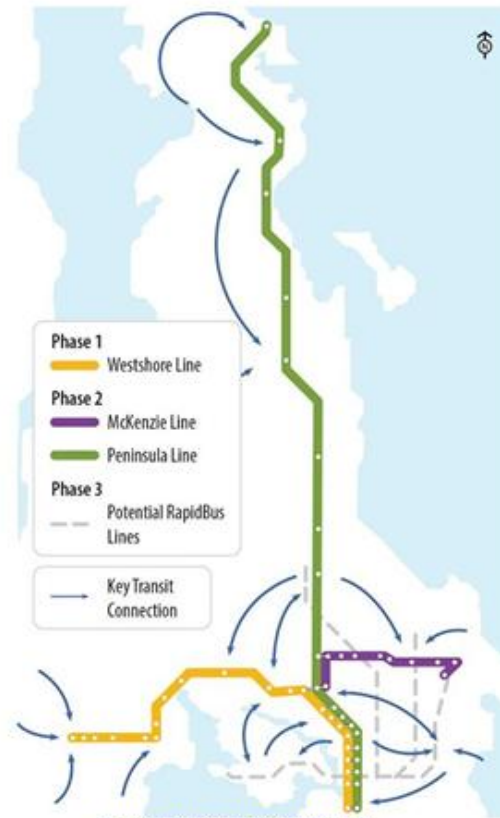
'Gentle density' in my view, euphemises what was in actuality, to become a major power grab over local zoning by the Province, along the lines of what the UDI had been lobbying it to achieve: "Provincial Intervention in Zoning" as the title puts it, and the now former Minister Cullen's name was at the top of the Cabinet Concept Paper regarding "the concept of and policy design work underway, with respect to provincial intervention in local government zoning to increase the allowable number of homes in single detached residential neighbourhoods."

The following charts were from the UDI's lobbying letter to Eby also delivered on March 10, 2022 and the same charts were also in the lobbying presentation provided to Eby on that day.

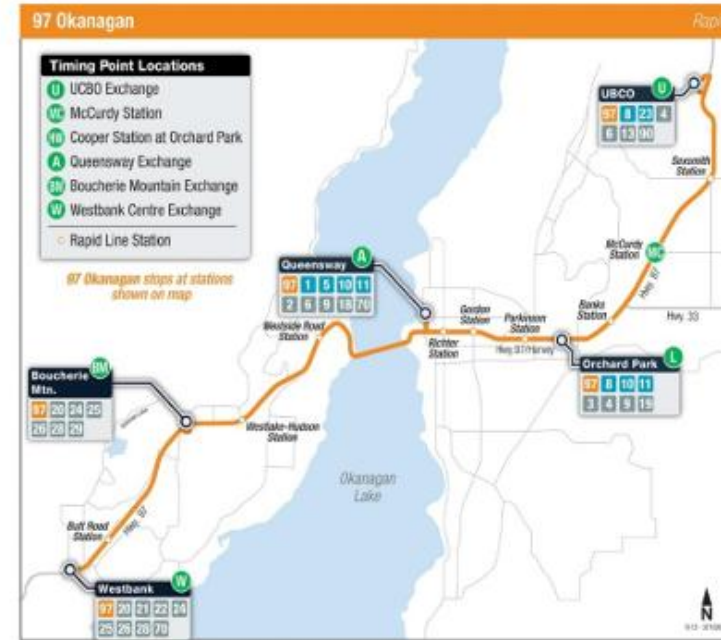
The Victoria Regional Rapid Transit Chart is from BC Transit, although the UDI did not mention this. Crown Corporation, BC Transit is a UDI member as is TransLink. Anne McMullin the UDI's President and CEO, who wrote this letter has served on TransLink's External Real Estate Advisory Group.

The UDI lobbied the Province for upzoning along so-called Rapid Transit corridors, including the Sky Train route, something that stood to make their member companies billions in potential profits if implemented.

As they put it: "The Province also has a much stronger case for eroding "... local government autonomy...", near transit stations"



[Victoria Regional Rapid Transit](#)



[Kelowna Regional Transit System - Route 97X](#)

The Province also has a much stronger case for eroding "... local government autonomy ...," near transit stations because of the billions of taxpayer dollars from across B.C. and Canada used to fund the SkyTrain lines serving these areas. Port Moody was connected to the Millennium Line in 2016, yet its population declined by 16 people from 2016 – 2021 (according to the recent census), when many other growing communities did not receive these types of investments.

For the same reasons noted above, NIMBY groups arguing against development occurring near stations will face an uphill battle. Growth is coming to the region, and these are clearly the best places for it to occur from social, economic and environmental perspectives, and in consideration of the tremendous taxpayer investments made to build the lines and the stations. Taxpayers who themselves are not benefiting from transit lines want to see these projects fully leveraged, and new homebuyers and tenants want to be able to move into these areas to access high-order transit.

UDI conducted a second round of polling building on the information gathered in 2021. The results further support the implementation of housing targets in transit-oriented areas. There is

- McMullin continued railing against hypothetical “NIMBY groups” in the way of the UDI’s agenda in the letter (see right).

Note: The Nch’kay Development Corporation of the Squamish Nation was a member of the UDI, according to the backed-up UDI members directory.

Provincial Land-Use Decisions

If targets are not met, the Province could impose its own pre-zoning around stations, by establishing “as of right” density and heights. Our members who work in California found that some councils were able to use the threat of losing local control over some planning decisions to convince NIMBY groups to accept more housing. Several older retail areas are now being redeveloped and revitalized with new mixed-use housing projects as a result.

We note that the Ontario Housing Affordability Task Force Report recommends allowing “... ‘as of right’ zoning up to unlimited height and unlimited density in the immediate proximity of individual major transit stations within two years if municipal zoning remains insufficient to meet provincial density targets.” The intent is not to have to take these steps; it is to ensure that local governments themselves plan and allow an appropriate number of units – given the amount of infrastructure investments made by senior governments in these areas.

As part of its land use decision making, the Province could increase densities even higher if PBR or non-profit housing units are incorporated into projects.

The Government may wish to consider allowing “super” density bonuses on sites where there are projects led by First Nations. We note that there has been little opposition to the Squamish Nation’s *Senakw* project by the Burrard Street Bridge with towers as high as 59 storeys. As clearly shown, the densities for this project are well above what has been allowed in the surrounding neighbourhoods. Higher densities are very appropriate in this area. It is close to downtown and has great access to transit/ferries as well as active transportation infrastructure.

A Carrot and Stick Approach...

In order to achieve the UDI's goals towards local zoning, the UDI offered in its letter to Eby, a carrot and stick approach for the Province to adopt towards municipalities:

Enforcement: Carrots and Sticks

Without enforcement mechanisms, the targets will not be taken seriously by local governments, so **UDI recommends a wide range of incentives and penalties if local governments do not achieve their targets.** With some of these measures in place, area planning discussions near transit stations will rapidly change from "*whether or not there be density near the stations*" to do we "*how best deliver the growth we need near the stations.*"

The punitive stick approach from the UDI (seen above) to local governments, not approving enough construction as to be satisfactory to the UDI, could as mentioned previously, involve for example, cutting infrastructure funding to local governments, or increasing taxes on those living around such areas.

The last “enforcement” slide in the UDI’s presentation to David Eby on March 10, 2022:

Enforcement

Using Debt as an Incentive

- Another approach that could be used is placing some of the debt of the new lines (e.g. costs of stations) onto municipalities.
- Municipalities could avoid interest charges and paying off the debt if they achieve their housing targets in a timely way. The Province could pay off the debt as housing is built near stations.



- The following 2 image excerpts are from the UDI letter to Eby. What the UDI lobbied Premier Eby for in 2022, looks remarkably similar to what the Province tabled 2 and a half years later in Bill 47.

Application Area

UDI recommends that for the initial phase, the housing targets be focused within a minimum of 400 metres of SkyTrain stations and Light Rail Transit (LRT) stations as well as at least 200 metres around Bus Rapid Transit (BRT) and RapidBus stops. This should begin with the highest order transit in the region (e.g. SkyTrain in Metro Vancouver and RapidBus in the Capital Region), and expand in the future to cover the Frequent Transit Network and Town Centres, as well as 800 metres around mass transit stations. This would eventually lead to city-wide targets.

Setting Global Targets

UDI recommends that the Province establish global housing targets which can then be allocated to municipalities – specifically the areas around transit stations and stops. Currently, regional and local governments identify their housing needs through *Region Growth Strategies* and the mandated *Housing Needs Assessments*. Unfortunately, the methodology for these measures is not robust, and as documented in the [Opening Doors Report](#), planners have consistently underestimated the number of housing units we need in British Columbia and elsewhere.

Not only was UDI member company Urban Systems receiving a virtual monopoly on the Housing Needs Reports/Assessments across the province through its subsidiary Urban Matters, but it was also key consultant on the BC Transit plan, and it was also a key consultant and Project Manager on the [Province's Active Transportation Design Guide \(2019\)](#), that helped the Ministry of Transportation develop and direct the 577-page guide. Under the acknowledgements for the guide (p.3), its logo was placed next to the Ministry of Transportation.

Urban Systems was also a consultant hired for Saanich's Active Transportation Plan, both of which were synchronous with the BC Transit plan. It also "prepared" with help from an architectural firm, the BRITISH COLUMBIA ACTIVE TRANSPORTATION AND TRANSIT-ORIENTED DEVELOPMENT DESIGN GUIDE: A Supplement to the British Columbia Active Transportation Design Guide (June 2021)

You might have noticed a pattern by now. The guide introduced Transit Oriented Development Areas (TODs) for provincial policy, which would over 2 years later be applied Provincially through Bill 47, and to which the UDI had demanded enforceable housing targets for. The UDI had previously lobbied the Federal government in 2017 for the adoption of TODs.

Conclusion

The UDI represents a vast web of lobbying activity representing corporations with combined assets of many billions of dollars that seek to push their agenda to government above that of the public, whom they have successfully pushed out of the local government chambers on a vast amount of rezonings.

Much of the UDI's activities involve what the UDI describes as "networking", in addition to their "advocacy".

Yes, the UDI is a vast network and it is highly organized, much more so than the actual government in my view, which is a key reason why the government is dependent on the UDI when it comes to urban planning. The problem with the kind of leverage and power that can come with this, by positioning the private above the public sector in urban design is clear, the fertile breeding ground for undue influence that it can bring and the undermining of democratic rule.

The ecological and social consequences of the housing bills especially Bill 44, will be irreversible and highly damaging, as local eco-systems are lost to vast amounts of construction regardless of environmental consequences and the public will have to pay the price, including literally, as the infrastructure costs mount.

What the UDI has achieved in British Columbia is in my view, nothing less than both state and regulatory capture when it comes to urban planning. State and regulatory capture runs entirely opposite to true democracy, which refers to a government ruled by its citizens.

What was revealed here is the result of finding and reviewing thousands of pages of information, and of many hours of painstaking work. It is a mere snippet of what is involved beyond the public view. Thank you.