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Having your say: A comparative review of public input practices for development approvals in British Columbia

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Abstract

Public input and engagement on land use decisions are one of the most visible and contentious aspects of local government administration. Minimum public input requirements for planning and land use decisions are described in legislation, with public hearings having a framework set out in common law. Beyond these requirements, each local government can develop its own processes for development approvals. Growing public expectations that public engagement will be practiced in a fair, robust and transparent way presents a challenge for local governments to develop policies and practices to support this important work. This comparative review examines the guidance and practices used to structure public participation and engagement in development approvals in select British Columbia municipalities. It explores how these tools are structured and identifies leading communications and deliberative practices.

Keywords: local government, development approvals, public engagement, British Columbia

Résumé

La contribution et l'engagement du public sur les décisions d'utilisation des terres sont l'un des aspects les plus visibles et les plus controversés de l'administration locale. Les exigences minimales de participation du public pour les décisions relatives à la planification et à l'utilisation des terres sont décrites dans la législation et les audiences publiques sont décrites dans la common law. Chaque gouvernement local peut développer ses propres processus pour les approbations de développement. Le public s'attend de plus en plus à ce que l'engagement du public soit pratiqué de manière juste, solide et transparente. Cela représente un défi pour les gouvernements locaux d'élaborer des politiques et des pratiques pour soutenir ce travail important. Cet examen comparatif examine les directives et les pratiques utilisées pour structurer la participation et l'engagement du public dans les approbations de développement dans certaines municipalités de la Colombie-Britannique. Il explore comment ces outils, pratiques et stratégies sont structurés et identifie les principales pratiques de communication et de délibération.

Mots-clés : gouvernement local, approbations d'aménagement, engagement du public, Colombie-Britannique

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Introduction

A growing emphasis on collaborative governance and citizen engagement in local government has led diverse communities to build capacity for these practices (Newman et al. 2004; Ghose 2005; Ansell and Gash 2008; Graham and Philips 1998). Success is dependent upon the capability and willingness of public officials together with citizens and organisations to be engaged partners in the governance process, to share information and to manage conflict along the way. For local government administration, this has led to professionalization of the engagement function including policies and practices, communications tools and ways of working with others to support this important work.

Public engagement is now prevalent across a wide range of governmental functions, but at the local level remains particularly visible and contentious in decisions about land use (Sloan 2018; Rosol 2014). Minimum public input requirements for planning and land use decisions are described in legislation, with public hearings having a framework set out in common law. Beyond these requirements, each local government can develop its own processes for development approvals. The public engagement process aims to balance the interests of community members on new developments that might impact them while at the same time providing a consistent and fair regulatory framework for builders and developers. There are growing calls to include more diverse voices in these decisions such as lower incomes residents and marginalised persons (Fainstein 2014).

Over a decade ago, the Auditor General of British Columbia published a report recommending standardized procedures for public engagement, including greater consistency regarding what levels of engagement are required for a particular purpose (Auditor General of British Columbia 2008). These recommendations were not adopted and today, public engagement practices can vary widely between local governments, including adjacent ones. In many places they are complex, lengthy and expensive, with significant uncertainties for the community and developers alike (Province of British Columbia 2019, 3).

This comparative policy review of B.C. municipalities examines the guidance and practices used to structure public participation in development approvals in small-large sized cities (those with a population of 50,000 and above). It identifies the current suite of local government public engagement practices, examining how these tools, practices and strategies are structured and identifies leading practices among them. This article proceeds in four parts: i) literature review, ii) methods; iii) key findings and iv) discussion and conclusions.

Balancing interests and managing expectations—public engagement from communications to empowerment

How should individuals be involved in decisions that impact them; how should such deliberation be structured and; how can be it inclusive of diverse peoples so that it does not reproduce systems of advantage/disadvantage? These questions form a major focus of contemporary democratic theory (Young 2003) and are at the heart of Arnstein's famed (1969) 'ladder of citizen participation' which highlights the extent of citizens' power in public policies and programmes. Today, public engagement is a widespread function of public administration (Schafer 2019). However, there are ongoing debates as how it can be truly deliberative and inclusive; how it meets broader social goals; the scale at which it is appropriately used and; how technology should facilitate it. At the local level, the robustness of public engagement practices are often a source of contention and even litigation, raising questions as to the extent to which they lead to informed and bottom-up decision making that improves outcomes.

Municipalities and regional districts in B.C. are empowered by provincial legislation to govern a wide range of areas, including the requirements and processes for development approvals. Most of the rules enabling local self-government are outlined in the *Local Government Act* and the *Community Charter*. Land use governance is nested: municipal zoning by-laws should conform to Official Community Plans (OCPs), and OCPs should in turn conform to Regional Growth Strategies (RGS). However, unlike other provinces, municipalities/regions are not required to have OCPs/RGSs (Magnusson 2017, 6). For those places that do, the legislation specifies which decisions must be made by elected officials, which may be delegated to staff, and which must be made by staff. Under the current system, amendments to zoning bylaws (i.e. rezoning applications) and development variance permits must be approved by elected officials, while development permits, temporary use permits, and tree cutting permits may be delegated (Province of British Columbia 2019). The City of Vancouver has more flexibility and some additional powers concerning land use matters and powers specifically outlined in its legislation (*Vancouver Charter*) as delegable to staff (Province of British Columbia 2019).

Local government land-use regulations enable local governments to implement a long-term vision as described in their OCPs. Other planning tools include zoning bylaws, Development Permit Areas, phased development agreements, housing agreements and subdivision servicing bylaws. The *Local Government Act* (LGA) includes several provisions for public information and participation in the land use regulatory process (Government of British Columbia 2015). For example, OCPs are adopted by by-law, and once adopted, all future bylaws and public works in the planning area must be consistent with them or require an amendment. Public hearings must be held before the third reading and adoption of an OCP. Local governments must comply with these provisions; however, they may also use other methods to enhance public participation in the regulatory process such as onsite signage, open houses, workshops, surveys, focus groups, and special advisory committees (Bish and Clemens 2008).

At a public hearing, all persons who believe that their interest in the property is affected by the proposed bylaw must be afforded a reasonable opportunity to be heard (Province of British Columbia 2020b, 2). This involves an opportunity to make a speech or presentation to the elected officials or to present a written submission. In many cases, notices about the public hearing may also indicate a time and location to submit comments before the public hearing (Province of British Columbia 2020b). The notice must be given in the newspaper before the hearing. The notice must be in at least two consecutive issues of the newspaper, the last publication to appear not less than three days and not more than 10 days before the public hearing and must state:

- The time, date and place of the hearing;
- In general terms, the purpose of the bylaw;
- The land or lands that are the subject of the bylaw; and
- The place, time and dates where the bylaw and related materials may be viewed (often the municipal hall or regional district office) (Province of British Columbia 2020b).

The public hearing process, therefore, acts much like a court procedure. These procedural requirements are a statutory pre-condition of the enactment of a zoning bylaw and do not always promote proactive, efficient communication and understanding of land use issues/community needs. Consequently, public hearing participants—including the development community—often find the process to be adversarial and provide winner/loser outcomes instead of compromises that can move a project forward while addressing local concerns. In BC, the development approvals process has been seen as exacerbating the housing crisis, with overall delays due to lengthy procedures delays caused by incumbent homeowners organising against new developments. In 2021 the BC government updated the *Local Government Act* to: “remove the default requirement for local governments to hold public hearings for zoning bylaw amendments that are consistent with the official community plan; and enable local governments to delegate decisions on minor development variance permits to staff” (BC Gov News, 2021). It is hoped that these changes will help to streamline development approvals.

Both Canadian and American researchers have noted the limitations of the public hearing process. For example, if misleading information arises during a public hearing, there are few mechanisms for correction (Baker, Lon Addams, and Davis 2005, 491). Allowing anyone to speak, regardless of their knowledge about the facts of a proposal, can generate increased misunderstandings and contribute to unnecessary conflicts that preclude a reasoned analysis of a proposal. Local governments have a role to play in educating the public during the prehearing phase, including attempts to combat false information. Public hearings often fail to achieve their intended goals, frustrating both agencies and communities. One reason is that administrators may comply minimally with laws requiring a public hearing, simply going through the motions absent real intent (Burby 2003, 36). Walters, Aydelotte, and Miller (2000, 357) note that laws requiring public hearings are usually only minimum standards, and additional input methods can be used to great advantage. For example, if the law requires hearings, public administrators can employ other input methods earlier in the decision process (Baker, Lon Addams, and Davis 2005).

Public hearings also typically occur late in the development approval process, after considerable time and significant cost has gone into a proposed project (Province of British Columbia 2019, 14). They tend to attract and empower well-organized interest groups that may not represent the broader perspectives of the community (Province of British Columbia 2019, 14). This can result in applications being denied despite them being aligned with adopted community and neighbourhood plans. NIMBYism, particularly as it relates to affordable housing, is often shaped by specific fears, including increased crime, poverty, and service and education costs, coupled with decreased property values and open space preservation (Scally 2013, 720). These fears may be unfounded; some studies have found posi-

tive effects of the development of affordable rental housing on many of the areas of concern (Deng 2009; Ellen et al. 2007, 258; Freeman and Botein 2002, 362). Yet NIMBY attitudes persist, and many local governments still oppose such housing through institutional actions (Pendall 2007, 36).

There is a large comparative literature on leading practices for meaningful education, engagement and earlier input from the public for the design of more robust and fair development approvals processes (Dear 1992, 288; Scally 2013). And yet, public engagement (even if it is well structured) does not necessarily lead to more democratic, inclusive and equitable outcomes and there may be tensions across these elements (Fainstein 2014; Flyvbjerg 1998). Moreover, there are different elements of justice or equity to consider: procedural, recognitional and distributional. Procedural justice is facilitated by inclusive, transparent and accountable planning and management practices. It ensures that those participating in the process are viewed as legitimate actors and that the decision making process is structured in a context-dependant way where stakeholders have access to justice and conflict resolution measures (Stavis and Felli 2014). Recognitional justice refers to the identification of rights holders and stakeholders and the integration of diverse worldviews, perspectives and values. Meanwhile, distributional elements of justice consider equity in planning outcomes including fair compensation and mitigation mechanisms. Local governments may design effective and fair procedures; however, unless diverse rights holders and stakeholders are identified and involved, decision making may be ultimately informed by a narrow set of interests and risk reproducing inequalities.

Public engagement functions are constantly evolving—it is process shaped by local cultures, social norms, institutions and technologies. There has been a proliferation of engagement tools and techniques in recent years, including citizen advisory committees, community circles, open houses, information booths, charrettes, social media and web-based tools (UBCM 2012, 3). This jurisdictional scan contributes to the literature by taking stock of current practices among select municipalities in BC and explores how they are embedded in local government administration. It examines the regularisation of public engagement as a feature of local public administration in development approvals alongside different aspects of justice and equity such as how decisions are made (procedural) and who is involved (recognitional).

Methods: Jurisdictional scan and semi-structured interviews

This study evaluates and compares the engagement strategies used in the development approval process in B.C. local governments with populations over 50,000. An exception is the City of Langford, which has an estimated population of 44,069 (2020); it is included because it is one of the fastest-growing municipalities in B.C. and as such is under intense development pressure (BCStats 2020). Web and document content analysis are used to determine the public engagement practices of all 20 municipalities. The scan reviews how local governments; i) define, use and categorize levels of engagement; ii) their values and principles for engagement; iii) the structure of citizen involvement in decision-making processes; and iv) the availability of planning and resources to assist and support engagement activities. The analysis was conducted in Microsoft Excel and was categorized to compare the guidelines across various elements such as timeframes, structure and accessibility to the public (i.e. websites dedicated to development tracking or citizen engagement).

Semi-structured interviews were conducted to gain context specific understanding of local government public engagement activities. Purposive and stakeholder sampling methods were chosen. Interview invitations were sent to three sectors (local government [staff and Councillors], the development community and neighbourhood associations). Five stakeholder interviews were conducted with participants from: the City of Victoria; the District of Saanich; the City of Langford; the City of New Westminster; and Aryze Developments. These interviews were conducted over video conference due to COVID-19 protocols. Content analysis for the semi-structured interviews was conducted by comparing the themes, commentary and experiences from the five participants.

This research has been conducted as local governments have been pressed to adapt to COVID-19 protocols. On March 18, 2020, the Province of British Columbia declared a state of emergency, which allows the Province to continue to use extraordinary powers under the Emergency Program Act to support the COVID-19 pandemic response (Order 2020). Local governments are required to hold public hearings before adopting certain land-use bylaws, such as OCPs and some zoning bylaw amendments. Local governments are now enabled to hold public hearings virtually and have adapted some of their public engagement practices. These practices are evolving and may not be adequately captured here.

Findings: Municipal public input practices for development approvals in British Columbia

Many of the BC municipalities studied are under intense development pressure. In places like Metro Vancouver and greater Victoria where there is high demand and a lack of affordability, development tensions make daily headlines. Despite diverse backgrounds—local government staff and members of the development community—all interview participants in this study expressed the common tensions and challenges associated with NIMBYism and well-organized interest groups that may not represent the broad perspectives of the community or even those who would be the most directly impacted by a development approval decision. Interviewees also expressed the need to solve housing challenges by having them spread throughout a community rather than isolated in one area and noted that a lack of dialogue and engagement across the greater community has hindered progress. They noted that local governments and stakeholders must focus on values held in common within the greater community and problems that most can

Table 1
Municipal public input practices for development approvals in British Columbia

Municipality	Population (2020 est.)	Citizen Engagement Framework	Public Engagement Principles	Citizen Engagement Website	Development Committee	Engagement Framework Timeframes	Development Tracker Website
City of Abbotsford	161,581						
City of Kamloops	101,198						
City of New Westminster	82,590						
District of Saanich	125,107						
City of Victoria	94,415						
City of Kelowna	146,127				X		
Township of Langley	133,302				X		
City of Surrey	598,530		X				X
City of Vancouver	697,266	X				X	
City of Burnaby	257,926	X	X			X	
City of North Vancouver	58,985	X	X			X	
City of Delta	111,281	X	X			X	
City of Nanaimo	101,336	X	X			X	
City of Richmond	216,046	X	X			X	
City of Prince George	82,290	X	X		X	X	
City of Chilliwack	95,178	X	X	X		X	
City of Prince George	82,290	X	X		X	X	
City of Langford	44,069	X	X	X		X	X
City of Coquitlam	152,734	X	X	X	X	X	
City of Maple Ridge	91,479	X	X	X	X	X	
City of Port Coquitlam	63,508	X	X	X		X	X

Note: 2020 population estimates produced by Government of British Columbia and consistent in aggregate with the Statistics Canada produced annual (July 1) provincial level totals (Government of British Columbia 2021). Table ordered by share of instrument use by municipality (lowest to highest) and alphabetically.

agree upon that must be solved (housing prices, housing stock, municipal solvency, the quality of local education, etc.). While these may be already identified in a community's OCP or Local Area Plan, not all local governments have finalized these initiatives, which can make it harder to set aside differing values to find solutions to shared concerns. In essence, they articulated that a bigger picture view is needed in terms of how residents and communities are engaged in the development process and how changes are communicated to them.

Table 1 summarises the jurisdictional scan of municipal public input practices for development approvals including the main tools, practices and strategies that inform the public engagement process. Of the 20 B.C. local governments analysed, only five local governments use all six instruments:

- City of Abbotsford
- City of Kamloops
- City of New Westminster
- District of Saanich
- City of Victoria

In total, among all of the public input practices (n=120), around half (55.8%) are employed in some manner, the most common being development tracker websites (a basic form of communication). There is little association between the size of municipalities and the number of instruments that they employ ($R^2=0.0215$). The remainder of paper outlines how these tools, practices and strategies are structured and used and discusses leading practices among the municipalities studied.

Citizen engagement frameworks and principles

Dedicated frameworks for citizen engagement can help entrench organizational values and guiding principles to include internal and external stakeholder participation in planning activities. They are a key component of the professionalization of the public engagement within local government administration. Among the municipalities of study, 40% (8 out of 20) of the B.C. local governments have formalized engagement frameworks. These frameworks vary in length and quality. Effective engagement ensures feedback is considered as decisions are made and that it is reviewed with equal consideration as part of the decision-making process. Ideally, these should be living documents that are updated with lessons learned and new tools and strategies. Only two of the eight engagement frameworks identify a plan to be updated (City of Victoria and Township of Langley). Updating frameworks are particularly relevant to create consistency as some frameworks were established as early as December 2013 (City of Kamloops) and late as June 2019 (City of Surrey). Notably, the City of Victoria and City of New Westminster have established public engagement frameworks with involvement from the public.

Less than half (40%, or 8 out of 20) of the local governments reference guiding principles such as those of the International Association of Public Participation (IAP2 2020) which are internationally recognised goals and standards for effective public engagement. While the scale and design of engagement strategies differ depending on topics of circumstance and controversy, principles inform how a local government can maximize public participation and create accountability as it expands upon its existing engagement strategies (New Westminster 2016, 10). The City of Victoria's Engagement Framework articulates engagement principles specific to the municipality's values and goals. The framework was developed through a Public Engagement Road Map workshop and a drop-in session. The

Table 2

City of Victoria social capital rubric

1	2		3	4	5	6
Avoidance	Awareness		Wake Up	Engagement	Access	Organizer
"Disconnected"	"I see beyond myself"	"I influence"	"I affect change"	"Needed"	"Part of the Solution"	

Source: Reproduced from City of Victoria, Social capital framework (2015,16).

goal was to work with the community to develop clear expectations on opportunities for the public to participate in City decision-making. The Framework is easily accessible online and includes a Table of Contents with background information on the initiative, information on how Council and City staff conduct their day-to-day duties and various charts, tables and engagement tools. It specifically mentions ongoing updates and appropriate engagement ‘windows’ and timeframes. Uniquely, it is grounded in the idea of reciprocity and good citizenship (Table 2).

The City of New Westminster’s Framework was also developed with citizen involvement including a public survey to solicit information from community members on how they interact with the City. Furthermore, the City conducted two public workshops as well as focus groups with five of the City’s Advisory Committees. The City also worked with the community to create a Toolkit with tools and methods that were provided by a specialist from Simon Fraser University’s Centre for Dialogue’s Civic Engage program. The Framework is easily accessible online and includes an Action Plan as well as details on dedicated City staffing for implementing the Framework by the City’s Communications Division.

In contrast, the engagement strategy for the Township of Langley was established by the Mayor’s Standing Committee on Public Engagement. This committee explored methods to better connect staff and Council with the public on planning and development processes and projects. As such, the Township’s goal was to ensure that meaningful two-way dialogue occurs consistently between community members, stakeholders and government during these processes. This Framework was one of the only ones created to look at development processes explicitly and was developed by a consultant (Modus Planning Design & Engagement Inc.). The process driven by Council and was directive and top-down.

Development committees

Development committees commonly represent the community at large, municipal staff, Council and stakeholders in the development sector. They can represent a diverse set of needs and provide guidance on all development proposals, ostensibly culminating in a balanced and fair set of interests. However, they can also be dominated by a narrow set of interests leading and operate beyond their mandate (Caradonna 2021). Committees and task forces have become increasingly necessary and important as local governments grow larger and more complex. A majority (80%) of local governments have some form of a committee for development approvals. These range from those with diverse with representation from the local government, development community and citizens (City of Langford, District of Saanich, City of Abbotsford), to those with the only representatives being members of Council (City of Nanaimo and City of Kamloops). The City of Langford’s Planning, Zoning and Affordable Housing Committee and Board of Variance are both dominated by real estate developers (Focus on Victoria, 2020). Of the 16 local governments that have a committee, five of them are designated either an “Advisory Design Panel” or an “Advisory Planning Commission” (City of Surrey, City of New Westminster, District of Saanich, City of Victoria, City of North Vancouver). Two of local governments do not have a committee and instead use a task force: the City of Delta’s “Mayor’s Task Force on Building Permits and Development Applications” and the City of Nanaimo’s “Health and Housing Task Force”. While Delta’s task force has diverse membership, representative of the greater community, Nanaimo’s task force is led by one-two members of Council and as such, is not representative of community interests.

While most local governments have a committee, very few have established Terms of Reference. The City of Chilliwack and its Affordable Housing & Development Advisory Committee (AHDC) have membership diverse and Terms of Reference that clearly outline their purpose and vision which is to serve as an advisory/liaison body between Council and the development, building, and real estate community. The AHDC also provides advice to Council on the implementation of the Affordable Housing Strategy and other policies and strategies to address housing needs in the community. Other notable local governments are the City of Langford, City of Chilliwack, City of Delta, District of Saanich, City of New Westminster and City of Surrey all of which have diverse committee composition.

No committee or task force holds decision-making authority. Instead, they provide advice to Council on community planning on: the OCP, including amendments, federal, provincial or neighbouring municipal development plans which may affect the OCP; plans or strategies such as transportation plans, economic development situations, or strategic plans which offset the OCP and; Zoning Bylaws, Development Permits and Development Variance Permits. In some cases (e.g., City of Vancouver), committees also organise conferences, consultations, competitions, presentations, and research on topics including housing, public realm, neighbourhoods, transportation, and public engagement.

Citizen engagement websites, social media and development tracking

BC local governments use technologies such as dedicated websites, online surveys and online public meetings (Zoom, Skype and Microsoft Teams) for public engagement, consultation and information sharing. The majority (80%) of local governments have a website dedicated to citizen engagement. Most local government engagement websites include contact information, hyperlinks to PDFs containing policies and initiatives and ways citizens can get involved. Both the City of Kamloops and City of Richmond have engagement websites dedicated to citizen feedback/input. For example, “LetsTalkKamloops” empowers citizens to be more active in shaping the community by listening to what citizens have to say, taking their opinions into account and reporting back. Citizens are also able to report to their respective cities on areas that might need improvement including potholes and park spaces. Another leading example of an engagement website is the City of North Vancouver, which links to different ways citizens can get involved with the City including ways to join different committees, becoming a park steward, participating in public meetings, volunteering as well as a mobile app that shows the City and its different parts of the street that might need to get upgraded and “City Connect”, serving as an online City new hub.

Development tracking websites are also common—all but three municipalities have one. These sites are commonly created by a local government’s development services department and provide residents, realtors and developers with updates on the status of projects. Development tracking websites provide interactive maps enabling users to find civic addresses, rezoning information and approval status. Detailed project descriptions, names of applicants, site and floor plans and the status of a project with council are also available. Development tracker websites typically lists projects that fall under rezoned applications, development permits and development variance permits.

The quality of the development tracking websites range from strong to poor. For example, only 9 out of 17 tracking websites break down each project by neighbourhood. This function is critical as most citizens want to see projects underway in their local proximity and would like to have easy access to plans, contact information and consultation dates. A strong example of a development tracking website is the City of Victoria, which gives users the option to look up a project by address or by neighbourhood. Other development trackers with an effective user interface are: the Township of Langley, City of Kamloops, City of Maple Ridge, City of Nanaimo, City of Victoria and District of Saanich.

Timeframes

Less than half (40%) of local governments identify a timeframe for engagement. The City of Victoria takes the strongest stance amongst local governments: it incorporates a two-week minimum notice to the community of any upcoming engagement initiative. Other methods included monthly communications about project progression, plan reports and upcoming events (City of Abbotsford) and more general statements such as engaging the public as early as possible in the project development process (City of Kamloops).

Regarding timeframes on Development Committees, most Committees meet once a month. With bi-monthly exceptions coming from the City of Langford and City of Delta. The most active Committees were from the City of Port Coquitlam and the District of Saanich, which met twice a month. The least active Committee is the City of Chilliwack, where meetings are held quarterly or as determined by the Chair of the Committee on an ‘as needed’ basis.

Discussion and conclusion

The frameworks, strategies and tools used by BC municipalities in the public engagement process speak to how these functions are embedded in public administration—i.e., how they are being professionalized and regularized as a function of local government. This analysis reveals that there is a great deal of variability in practices. Even initiatives that are a fundamentally part of good communications and information sharing such as development tracker websites vary among municipalities. In the majority of cases they do not have functional interfaces that allow individuals to search by address, limiting their usefulness. The terms of reference and composition of development committees also differ considerably. In some communities they have representatives from the local government, the development community and citizens (City of Langford, District of Saanich, City of Abbotsford), while others are comprised solely of members of Council (City of Nanaimo and City of Kamloops). It is notable that so few municipalities have terms of reference for development/housing committees.

At an even more basic level, frameworks and principles to guide public engagement are lacking in around half of all municipalities. This matters as it speaks to the culture of public engagement within the organization. A formalized local government engagement framework ensures that each local government sets a standard of excellence when working with citizens and stakeholders by following engagement leading practices consistently. It is intended as a guide to assist Council and staff in understanding the purpose of engagement as well as their responsibilities within the process by outlining the concepts of public and internal engagement, the government's approach, commitment and expectations and provides tools to help Council and staff integrate engagement into projects. Just because a municipality has such a framework or principles in place may not necessarily mean that it is implementing these practices; a document does not speak to a culture. They are nevertheless important and in some municipalities, such as the City of Victoria, it is evident that these frameworks are living documents that were established with community support and buy in, thus making them documents of accountability. It is surprising that these are not more common.

Many of the initiatives reviewed speak to the procedural elements of justice—such information sharing and two-way communications (citizen engagement websites). However others speak to the distributive elements such as the composition of development committees. There are growing expectations that public engagement for development approvals and other functions of local government administration will be done in a professional manner and yet, in many cases the basic frameworks are not in place to develop and support this culture, let alone address the voices of underrepresented or marginalized persons in the process. Procedural elements of justice can reinforce distributional justice, or detract from it, depending on how things are structured. For example, responses to the COVID 19 pandemic have thrown into relief the potential to integrate and automate other services related to public engagement and the development process such as online building permits (Westminster, 2020). Since Spring 2020, local governments can hold public hearings and meetings electronically (Province of British Columbia, 2020). However it remains an open question when this democratizes the process and leads to more effective engagement and the inclusion of a diversity of voices.

While this jurisdictional scan has provided an overview of practices, it does not offer an in depth assessment of individual public engagement initiatives for development approvals. It is hoped that the leading practices and gaps identified may offer fruitful avenues for future research. At the most basic level this study lends support to the Auditor General BC's of recommendations over a decade ago on the need to standardize some aspects of public engagement, as many local governments evidently do not have the framework principles, tools and strategies in place (Auditor General of British Columbia 2008).

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