

October 24, 2025

Mark Norton
City of Burnaby
4949 Canada Wy
Burnaby, BC V5G 4A3

Re: Processing Development Fees and Charges for New R District Rezoning

Dear Mr. Norton,

As you know, the Urban Development Institute (UDI) has been supportive of the City's Height-Based Framework and other planning reforms as they will provide clarity and simplicity to the development review process. However, we are concerned with the proposals in the Report approved at the Planning and Development Committee on October 8 outlining the *Recommended Approach to the Processing of Development Fees and Charges for New R District Rezoning* – specifically, the City's approach to processing development fees/charges under the new Height-Based Framework.

While the report intended to provide clarity during this transition, the proposed approach creates inequitable treatment when projects that were adopted under the previous framework, are amended to proceed under the new system.

As discussed at our October 15 UDI Burnaby Liaison Committee meeting, the proposed approach creates disadvantages for projects that have already received Final Adoption under the previous RM District rezoning framework. The recommended approach would require proponents of adopted projects who want to transition to a new R District rezoning to continue to make quarterly interest payments on deferred density bonus obligations. This would continue until the new (R District) application receives First and Second Reading.

A one-year deferral of interest rate charges for these projects would come into effect after Second Reading. However, if Final Adoption does not occur within that window, the City would fully reinstate all the deferred interest charges. This 12-month limit presents a significant challenge in practice. Rezoning processes in Burnaby frequently extend

beyond a year, and as noted in previous UDI correspondence, current market conditions have caused many projects to pause until financial viability improves. Requiring ongoing interest payments during these delays penalizes adopted projects, many of which are already struggling with feasibility.

We recommend that the City allow adopted projects to follow the new Height-Based Framework without penalties, so the rules align with new R District applications (with no requirements for any interest payments until Building Permit issuance).

The inconsistency between how previously adopted projects and new applications are being treated under the Height-Based Framework discourages investment in approved projects and creates further barriers to moving these projects forward.

We appreciate the City's efforts to bring transparency and predictability to this complex transition and would welcome the opportunity to work collaboratively to refine the approach so that no projects are inadvertently disadvantaged.

Please do not hesitate to reach out should you wish to discuss this further.

Yours sincerely,



Anne McMullin
President and CEO, Urban Development Institute