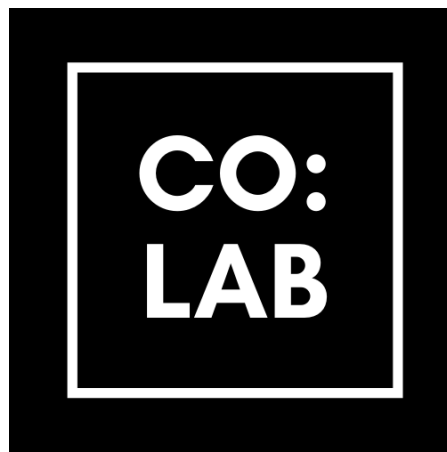




SURREY CHILD CARE

PLANNING AND POLICY REVIEW

October, 2021



Prepared by
CO:LAB Planning & Design
for the
City of Surrey

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EXECUTIVE SUMMARY

In the Spring of 2021, the City of Surrey contracted CO:LAB Planning & Design to conduct a planning policy and regulation review. The purpose of the review was to identify existing barriers to the creation of new child care facilities in Surrey from a planning policy and regulation perspective and to recommend updates to the City's planning policies, regulations and processes with the goal of facilitating the provision of child care facilities in Surrey.

Consultations were conducted with key stakeholders including: City of Surrey staff; Surrey Child Care Task Force; Child Care Options Resource and Referral Program; Fraser Health Licensing; and private and non-profit child care operators. Key themes or issues that were identified through the engagement process included:

- A lack of clear and accessible information about the City's requirements from a development application perspective;
- The need for a coordinated internal review process that would involve City staff from multiple areas as well as an improved internal tracking system of projects;
- The challenges associated with commercial and residential child care spaces and the need for more purpose-built child care spaces; and
- Barriers created by certain parts of the City of Surrey's Zoning By-law and outdated child care guidelines.

This report provides eight recommendations to facilitate the creation of new child care spaces in Surrey by:

- Building capacity between child care operators and the City of Surrey;
- Amending existing City policies and regulations; and
- Developing a new child care policy for the City of Surrey

These recommendations will help to facilitate new child care facilities in Surrey.

INTRODUCTION

In order to better meet the child care needs of families, in 2018 the Province of British Columbia introduced expanded investment in the child care sector totalling \$1 billion over three years. This included \$237 million to improve access to child care, including funding the creation of 22,000 new licensed child care spaces.

To ensure that this investment would create child care spaces in areas with the greatest need, the Province provided the Union of BC Municipalities (UBCM) with funds to administer a Community Child Care Planning Program. The Program provides local governments with grants to prepare a local child care space creation action plan. One required component of the plan is a “plan, bylaw and policy review”. This report represents this component of Surrey’s Child Care Action Plan.



ABOUT CHILD CARE

Local governments play an important role in facilitating child care facilities through land use planning, policies and regulations. In addition, municipalities have a responsibility to ensure that child care facilities comply with the BC Building Code and the BC Fire Code.

Fraser Health licenses child care facilities in accordance with the Provincial Community Care and Assisted Living Act.

In addition to child care facilities that are located in schools and other public buildings, child care facilities in Surrey are often located in residential settings, such as single family homes; and in commercial settings, in either purpose-built or retrofitted commercial spaces.

Child care operators in Surrey are either private (for-profit) or non-profit charitable organizations.



ENGAGEMENT SUMMARY

1.0 BACKGROUND

As part of the “plan, bylaw and policy review” component of Surrey’s Child Care Action Plan, a series of stakeholder engagement sessions were held in May and June, 2021.

Interviews were conducted with **City of Surrey Staff** from Building, Area Planning, Trees and Landscaping, Transportation Engineering, Fire Services and Parks, Recreation and Culture.

Additionally, interviews were conducted with external stakeholders, including **Child Care Options Resource & Referral Program, Fraser Health Child Care Licensing** and the Co-Chairs of the **Surrey Child Care Task Force**.

Two separate focus groups were held with child care providers: one for **private child care operators** and one for **non-profit child care operators**. Questions in these focus groups were centred around physical space requirements (commercial vs in-home space), parking, outdoor play space, the application process and grants and funding.

The following is a summary of the key themes that emerged through the stakeholder engagement.



2.0 LACK OF CLEAR AND ACCESSIBLE INFORMATION

The main issue identified by **City of Surrey staff** is that applicants are not aware of the City's requirements from a development application perspective. Most child care operators, especially smaller operators, are not developers and are therefore unfamiliar with the development application process. Many child care operators do not speak English as their first language. The information that the City provides to help guide child care operators is not accessible because it is not easy to find, it is sometimes not written in plain language and it is often only available in English.

The BC Building Code and BC Fire Code are difficult for many operators to understand and, as a result, applications are often incomplete or lacking the details required for approval. Fire Services indicated that information and resources for operators should be updated to clearly indicate that smoke alarms and/or smoke detectors are required in all group care settings in which napping may occur, notwithstanding whether a nap area is required by the care program type.

City staff agreed that the information the City provides to the public and to operators could be improved in terms of content, clarity, and accessibility.

The application review process would be faster and more efficient if applicants were prepared to navigate the City's requirements and understood what would be required from a BC Building Code perspective for their particular application.

The Co-Chairs of the **Surrey Child Care Task Force** agreed that there is a gap in understanding between the City and child care operators which acts as a significant barrier to the creation of new child care spaces. Building capacity between child care operators and the City of Surrey would have a positive impact on both parties and would help to improve the outcomes of child care applications.

Interviews with **Fraser Health** and **Child Care Options Resource & Referral Program** highlighted the gap in information between the City of Surrey and operators. While both organizations attempt to provide as much information as possible to operators before they make their applications to the City, the information that these organizations have about City processes and provide is lacking and sometimes outdated.

Private and non-profit child care operators agreed that having clear, easily accessible information available online about the City's process and requirements for child care facilities would help operators be better prepared for the application process. Many operators indicated that checklists for commonly inspected items would be helpful.



3.0 NEED FOR COORDINATED INTERNAL REVIEWS

While there are dedicated Area Planners and Building Plan Checkers who handle applications for child care facilities, **City of Surrey staff** felt that the internal review process could be improved through a coordinated group review process including staff from Area Planning, Building, Transportation Engineering and Trees and Landscaping. As well, an improved means of tracking internal referrals to these groups would likely result in shorter application review timelines.

Fraser Health and Child Care Options Resource & Referral Program indicated that if there were a dedicated review group at the City that included staff from all the application review areas, operators would be better prepared for both the City's process and requirements, which would expedite the review process.



Both **private and non-profit child care operators** believe it would be helpful to have a dedicated group at the City with whom they could meet to review the requirements related to a particular site. If operators could meet with staff before securing a space or submitting a grant application, outcomes would likely be improved, and approval timelines would likely be shortened.

City staff indicated that it can be difficult to track projects through the review process in AMANDA*, especially if the project does not require Council approval. Staff felt that there should be some mechanism in AMANDA* to track **all** child care projects, whether or not they require Council approval. Increased project tracking would improve review timelines as well as provide staff with the ability to look up all child care projects in Surrey for the purpose of data collection.

**AMANDA is software used internally by the City of Surrey to manage the processing of business licensing, permits, and development applications.*



An expedited review process can result in improved outcomes and shorter approval timelines

4.0 SUITABLE COMMERCIAL CHILD CARE SPACE

Commercial spaces are preferred over in-home spaces by **non-profit child care operators** and many **private child care operators**. Commercial space allows for a larger number of children which helps make these facilities financially viable providing economies of scale as well as a range of groups/ages needed to balance out the ratios of staff to children in care. The biggest challenge to finding a suitable commercial space for a child care facility is finding a location with sufficient and suitable outdoor space.

Non-profit operators are largely uninterested in locating in commercial spaces that are not purpose-built for child care as these spaces often have inadequate outdoor space and insufficient natural light.



Many **private child care operators** have and plan to continue to retrofit commercial spaces that are not designed for child care. However, they find it challenging to create suitable outdoor space as this often comes at the expense of parking spaces, such as when converting parking spaces into an outdoor play space.



The biggest challenge to finding a suitable commercial space for a child care facility is finding a location with sufficient outdoor space.

5.0 NEED FOR PURPOSE-BUILT CHILD CARE SPACE

Both **private and non-profit operators** believe that increasing the number of purpose-built child care spaces would benefit families in Surrey because these spaces are thoughtfully designed for child care. The availability of these types of spaces would alleviate the need for private operators to retrofit child care facilities into less-than-ideal locations such as strip malls and other commercial spaces where it is challenging to create suitable outdoor play spaces.

Private child care operators who wish to open new child care spaces in purpose-built space find it difficult to know where such spaces are being proposed through development applications.

It would be helpful to have a list or map that shows proposed purpose-built child care facilities that are under application in Surrey.

Non-profit child care operators require government investment. They are not able to lease space at market rates due to the high cost to rent relative to the fees that non-profit operators charge and the staffing costs they incur. As a result, unless these facilities are built as part of a publicly-owned building or secured by the City through development and then turned over to the non-profit operators at no charge, purpose-built child care spaces are likely to only be utilized by private operators.



6.0 RESIDENTIAL CHILD CARE SPACE CHALLENGES

Residential or in-home child care centres are preferred by many **private operators**. While many operators run small centres with up to 8 children, other private operators run larger centres in single family houses with up to 25 children. In-home child care centres are preferred by many **private operators** due to their ideal location in the community and appropriate outdoor play space.

Non-profit child care facilities generally require a minimum of 40-50 children to make a centre financially viable. As a result, residential spaces are challenging for **non-profit operators** to utilize.



In-home child care spaces are challenging for non-profit operators to utilize.



CHALLENGE

7.0 ZONING BY-LAW BARRIERS

Private and non-profit child care operators noted a few sections of the City's Zoning By-law that act as barriers to the creation of new child care spaces.

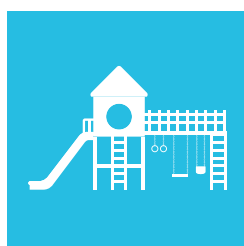


CHILD CARE ZONE (CCR)

The City's Zoning By-law (Part 43(B), Child Care Zone (CCR)) permits child care centres with up to 25 children in a single family house as long as someone also lives on the property. The child care use cannot be the only use on the lot.

Both **private and non-profit child care operators** agreed that the City's requirement that a child care centre licensed to accommodate a maximum of 25 children requires that a person also live on the property is a barrier and that CCR-Zoned child care centres should be permitted without the need for someone to also live in the house.

Some **private operators** felt that it would be easier to create child care spaces in homes if the maximum number of children was increased beyond the current 25 permitted in the CCR Zone.



OUTDOOR SPACE

Surrey's Zoning By-law requires that child care centres must have direct access to an open space and play area within the lot.

One **private child care operator** indicated that the City's requirement that a child care centre must have direct access to an open space and play area within the lot is a barrier, and that the City should allow for more creative outdoor play area locations, such as on the roofs of buildings or at nearby parks in certain cases.



PARKING

Private and non-profit child care operators agree that the City's parking requirements present a barrier to the creation of new child care facilities. The perspective of child care operators is that the amount of parking required is excessive, especially for commercial spaces where there are alternate hours of use for child care drop-off and pick-up relative to other uses in the commercial area (i.e drop-off and pick-up times are different than busy shopping times).

In 2016, the City of Surrey undertook a non-residential parking rates update. This update did not include the child care use. Child care parking rates were subsequently updated slightly, although a comprehensive study was not undertaken to determine the most reasonable parking numbers. Staff from Transportation Engineering indicated that a current update to child care parking rates, including a comprehensive parking study, should be undertaken and should also consider stroller and cargo bike parking.



8.0 OUTDATED CHILD CARE GUIDELINES

The City's Guidelines for the Location and Siting of Child Care Centres, prepared in 1990, is outdated. Section 7 in particular, which outlines the need to *avoid an undue concentration of centres*, acts as a barrier to the creation of new child care facilities.



9.0 BARRIERS FOR CHILD CARE OPERATORS

Private child care operators face several barriers in creating new child care spaces. Some of these barriers are due to the City's planning policy and regulations, some are related to the City's internal review process for child care applications, and some are related to a lack of appropriate and accessible City information of the various City requirements and processes for operators.

While **non-profit child care operators** also experience the barriers outlined above, the single biggest challenge for non-profit child care operators is securing affordable space. Quality non-profit child care requires government investment both for its operation (to keep fees affordable) as well as to secure the physical space at little to no cost.

The non-profit child care model is hinged on the availability of space at little to no cost. This space can be provided in public buildings or on public land or secured by municipalities through new development and then turned over to operators at little to no cost.



Planning & Policy Recommendations

Through the stakeholder engagement, a number of **planning and policy** barriers were identified that impact the creation of new child care spaces in Surrey. Barriers to the creation of new child care spaces in Surrey can be addressed in the following ways:

01 — BUILDING CAPACITY BETWEEN CHILD CARE OPERATORS AND THE CITY OF SURREY

- **PROCESS:** Proposing modifications to the City's internal and external processes for building permits, rezoning applications, and development permits.
- **INFORMATION:** Increasing the access to and the quality of information about the City's process and requirements for operators to simplify and expedite the layered child care licensing processes.

02 — AMENDING EXISTING CITY POLICIES AND REGULATIONS

03 — DEVELOPING A NEW CHILD CARE POLICY FOR THE CITY OF SURREY



The following is a list of specific **recommendations** to address existing barriers to creating new licensed child care facilities in Surrey.

1

INFORMATION AND RESOURCES

Barrier

Child care operators are typically unfamiliar with the array of regulatory approval processes required to open new facilities.

Recommendation

Update the City of Surrey's information and resources online and in the form of pamphlets to include current and easy to understand information for child care operators.

Rationale

Increasing the quality of and access to information about the City's requirements and process will ensure that child care operators, as development applicants, are better prepared to navigate the process, resulting in applications that are easier to review with faster approval timelines.

2

INTERNAL REVIEW PROCESS

Barrier

While there are dedicated Area Planners and Building Plan Checkers who handle applications for child care facilities, there is no coordinated group review process at the City. As a result, child care operators are often ill prepared for both the City's process and requirements, which can result in unnecessary delays.

Recommendation

Explore the feasibility of creating a Coordinated Child Care Review Group for child care inquiries and applications. Encourage child care operators to meet with the review group prior to securing or submitting a grant application in order to clarify requirements.

Set up an application tracking system in AMANDA* for Tenant Improvement and Minor Development Permit Amendment child care applications.

**AMANDA is software used internally by the City of Surrey to manage the processing of business licensing, permits, and development applications.*

Rationale

Child care operators can meet with this Coordinated Child Care Review Group prior to leasing a space or submitting a grant application to clarify requirements and streamline approvals.

Barrier

Part 4(B).9, General Provisions in Surrey Zoning By-law, 1993, No. 12000, permits child care centres with up to 8 children in residential Zones as an accessory use to a residential use.

Part 43(B), Child Care Zone (CCR) in Surrey Zoning By-law, 1993, No. 12000, permits child care centres with up to 25 children in residential zones as long as they do not constitute a singular use on the lot.

Recommendation

Undertake further consultation and research to determine if the requirement that when a child care facility is in a single family house, that someone must live in the home in which the child care centre is located.

Rationale

The requirement that someone must live in the home in which the child care centre is located could be a barrier to the creation of new residential child care centres. There are other municipalities in the region that also have this requirement. Further work would be required to determine if this requirement serves as a major barrier in the provision of child care centres in single family houses and if so, would the removal of this requirement negatively affect residential neighbourhoods.

4

ZONING BY-LAW (PARKING)

Barrier

Table C.1 in Part 5, Off-Street Parking and Loading/Unloading in Surrey Zoning By-law, 1993, No. 12000, requires 0.70 parking spaces per employee plus 0.15 parking spaces per licensed child for drop off, or 2 parking spaces, whichever is greater.

Recommendations

Undertake a review of child care parking rates, including a comprehensive parking study which also considers stroller and cargo bike parking.

Consider the alternate hours of use provision in the Zoning By-law.

Amend Surrey Zoning By-law, 1993, No. 12000 to reflect revised parking rates, if applicable.

Rationale

Decreased parking rates will facilitate the creation of new child care facilities, especially in existing commercial areas where parking and outdoor space often compete with one another for space on tight site plans.

5

ZONING BY-LAW (OUTDOOR PLAY SPACE)

Barrier

Surrey's Zoning By-law requires that child care centres must have direct access to an open space and play area within the lot.

Recommendations

Amend Section J in Parts 20-29, 31, 32, 35-39, 43 and 45-48A and Section B of Part 44 of Surrey Zoning By-law 1993, No. 12000 to remove the word 'direct' from the requirement for access to an open space and play area within the lot.

Rationale

Fraser Health regulates outdoor space requirements in accordance with the Community Care and Assisted Living Act. There are instances where direct access to an open space and play area within the lot is not feasible. Removing the requirement for the access to be "direct" will allow for more flexibility in provision of outdoor play space on a lot and allow for solutions that could be considered on a case by case basis.

Barrier

The City's *Guidelines for the Location and Siting of Child Care Centres* (1990) is outdated and Section 7 (avoid an undue concentration of centres) is a barrier to the creation of new child care facilities.

Recommendation

Create a new child care policy that reflects current realities and promotes the creation of new child care facilities in Surrey. Replace the existing Child Care Guidelines with the new policy.

Rationale

Planners can reference an up-to-date policy that encourages and promotes new child care facilities in reports to Council.

An updated policy will provide clear direction for child care operators and City staff.

Barrier

Child care applications that do not require Council approval are difficult to track between review groups within the City, which can result in longer review timelines.

Child care operators are unable to access information about where new purpose-built child care spaces are proposed as part of new developments. This information is not available on COSMOS**.

Recommendation

Add a mechanism in AMANDA* to track all child care projects, whether or not they require Council approval, such as a checkbox or drop down menu indicating the project includes a child care use.

Set up an application tracking system in AMANDA for Tenant Improvement and Minor Development Permit Amendment child care applications.

Add a publicly accessible layer to COSMOS that shows development applications where child care spaces are proposed.

Rationale

Project tracking improves review timelines and provides staff with the ability to look up all child care projects in Surrey for the purpose of data collection.

Deadlines and priorities can be set by each review group. This will help to prevent reviews that do not require Council approval from falling through the cracks.

In combination with the recommendation to track child care applications in AMANDA*, a publicly-accessible layer in COSMOS* that shows where child care spaces are proposed would assist child care operators in making contact with developers to negotiate leases at the earliest stage of a project.

**AMANDA is software used internally by the City of Surrey to manage the processing of business licensing, permits, and development applications.*

***COSMOS is the City's online mapping system.*

SECURING PURPOSE-BUILT CHILD CARE FACILITIES THROUGH DEVELOPMENT

Barrier

Surrey has an established density bonus program which uses Community Amenity Contributions (CACs) provided by developers to fund various community facilities and services.

Bonus densities above those identified in the Official Community Plan (OCP) may be granted subject to the provision of sufficient community amenities (i.e. extra units or stories may be permitted if appropriate community amenities are provided). The conveyance of space to the City for the provision of non-profit child care space is not clearly articulated in the density bonus policy.

Recommendation

To facilitate non-profit child care:

- Explore the feasibility of creating a universal CAC to fund non-profit child care facilities, similar to the Affordable Housing and Public Art CACs.
- Consider the conveyance of non-profit child care space to the City, in exchange for additional density.
- Explore the concept of allowing the floor area of a building that comprises a purpose-built, non-profit child care facility to be excluded from the calculation of Floor Area Ratio. Ensure the perpetuity of the child care use through a Restrictive Covenant.
- Consider the development a CAC credit for the portion of a development's floor area that comprises a purpose-built, non-profit child care space, secured through a Restrictive Covenant or conveyed. For example, a 4,000 sq. ft. non-profit child care facility would provide an equal credit that could be applied to residential density.
- Explore new OCP or secondary policy that would require large scale comprehensive developments to provide purpose-built child care space as part of development. Examine potential threshold residential unit numbers that would trigger the policy.

Rationale

Increasing the number of purpose-built child care spaces would benefit families in Surrey. Surrey is especially lacking in the number of non-profit child care centres as compared to other municipalities in the region. Purpose-built child care spaces are desired by many child care operators. However, unless these facilities are secured by the City through development and then turned over to the non-profit operators at no or low cost, purpose-built child care spaces are likely to only be utilized by private operators.



**LEARN MORE ABOUT THE CITY OF SURREY'S
CHILD & YOUTH FRIENDLY CITY STRATEGY:**

<https://www.surrey.ca/about-surrey/social-planning/child-youth-friendly-city-strategy>

