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**To:** "Direct to Mayor and Council - DL"  
**Date:** 3/21/2023 5:51:00 PM  
**Subject:** COUNCIL MEMO - Interim update on Council Motion: Harmonizing City of  
**Attachments:** ACCS - GM - Memo (Council) - Childcare Motion report back (2023-03-20).pdf

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Dear Mayor & Council,

The attached memo from Sandra Singh, GM of Arts, Culture and Community Services, provides an interim update on the December 7<sup>th</sup> Council Motion: Harmonizing City of Vancouver and Provincial Childcare Policies and Licensing Requirements (RTS 15496).

- In response, staff have undertaken a:
  - Historical review of Vancouver's Childcare Design Guidelines;
  - Detailed a comparative analysis with the Province's licensing requirements;
  - Connected with the Province regarding their work on updating standards which is currently underway; and
  - Integrated the motion response into a draft cross-departmental Implementation Plan for Making Strides: Childcare Strategy.
- Provincial staff advised that it would be advantageous for the City to align its directions with any future Child Care Design Standards.
- Accordingly, unless otherwise directed by Council, staff will finalize work on the Council motion alongside the confirmation of the new Provincial Standards.
- Based on the Provincial Standards development timeline, staff anticipate reporting back to Council in Q4 2023.

Should you have any questions, please don't hesitate to contact Sandra directly and she will ensure responses are provided through the weekly Q&A.

Best,  
Paul

**Paul Mochrie (he/him)**  
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The City of Vancouver acknowledges that it is situated on the unceded traditional territories of the xʷməθkʷəy̓əm (Musqueam), Skwxwú7mesh (Squamish), and səlilwətaʔ (Tsleil-Waututh) Nations.

## MEMORANDUM

March 20, 2023

TO: Mayor & Council

CC: Paul Mochrie, City Manager  
Armin Amrolia, Deputy City Manager  
Karen Levitt, Deputy City Manager  
Rosemary Hagiwara, Acting City Clerk  
Maria Pontikis, Chief Communications Officer, CEC  
Teresa Jong, Administration Services Manager, City Manager's Office  
Mellisa Morphy, Acting Chief of Staff, Mayor's Office  
Trevor Ford, Director of Operations, Mayor's Office  
Andrea Law, General Manager, Development, Buildings & Licensing  
Theresa O'Donnell, General Manager, Planning, Development and Sustainability  
Patrice Impey, General Manager, Finance, Risk & Supply Chain Management

FROM: Sandra Singh, General Manager, Arts, Culture and Community Services

SUBJECT: Interim update on Council Motion: Harmonizing City of Vancouver and Provincial Childcare Policies and Licensing Requirements

RTS #: 15496

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### PURPOSE

This memo provides an update on work to advance the Council Motion *Harmonizing City of Vancouver and Provincial Childcare Policies and Licensing Requirements* (December 7<sup>th</sup>, 2022; RTS #15496).

### BACKGROUND

- In 1990, Vancouver City Council approved the first Civic Childcare Strategy.
- In 1993, Council approved the City's *Childcare Design Guidelines* ("the guidelines") to be required as a condition of rezoning or for development permit applications.
  - The *Childcare Design Guidelines* offer tangible recommendations that help applicants meet the provincial regulations prior to occupancy of a facility. Based on evidence based research, the guidelines go beyond the provincial regulations of basic health and safety in operational functionality and space (see comparative

analysis below for details). The design guidelines apply to childcare facilities that offer full-day, licensed childcare serving children 0-5 years.

- In 2006, Council directed staff to “review the guidelines with respect to City of Vancouver Childcare standards, to facilitate principles of EcoDensity and the City’s Economic Development Strategy”.
  - The review (RTS #6475) addressed key concerns of whether the guidelines posed a barrier to childcare creation and whether elimination of the guidelines would affect quality of care and long-term health outcomes for children. In response, Council amended their continued use to “*where the guidelines can be met*” and directed staff to facilitate resolutions where applications cannot meet the guidelines.
- In 2021, staff reviewed the guidelines for outdated language and made the guidelines more user-friendly. No substantive changes or alterations were made.
- In April 2022, provincial responsibility for childcare shifted from the Ministry of Children and Family Development (MCFD) to the newly established Ministry of Education and Child Care (MECC), opening the door to new possibilities for positioning childcare and early learning as an extension of the universal, public education system, and integrating childcare facilities within educational infrastructure.
- In June 2022, Council approved *Making Strides: Vancouver’s Childcare Strategy* (RTS 14540). The renewed strategy recognizes new and emerging roles for all levels of government in a senior government-led universal childcare system. Key objectives include aligning the City’s childcare policies and directions with Provincial directions, and positioning the City to leverage all available senior government childcare commitments.
  - Staff was directed to report back to Council in 2023 on the status of the Childcare Strategy’s early actions, and to seek approval of a 4-year Strategy Implementation Plan.
- On December 7, 2022, Council passed the Motion: Harmonizing City of Vancouver and Provincial Childcare Policies and Licensing Requirements (RTS #15496) and requested an initial report back on progress and next steps.

## **DISCUSSION**

To date, in response to the December 7 Council motion, staff have undertaken a (1) historical review of Vancouver’s Childcare Design Guidelines, (2) detailed a comparative analysis with the province’s licensing requirements, and (3) integrated the motion response into a draft cross-departmental Implementation Plan for *Making Strides: Childcare Strategy*, with an expected Q4 2023 report back to Council.

### **Comparative Analysis**

To assist in identifying opportunities for alignment, staff have detailed a comparative analysis of the City’s *Childcare Design Guidelines* and the Provincial *Child Care Licensing Regulations*. A high-level overview is provided below and more detail in the Appendices.

#### *Provincial Regulations:*

- The Provincial *Child Care Licensing Regulations* (“the regulations”) is administered by Vancouver Coastal Health – Community Care Facilities

Licensing (CCFL) and identifies, but does not prescribe, a limited number of facility requirements:

- minimum indoor and outdoor space requirements;
  - number and type of washroom facilities;
  - age appropriate furniture;
  - age appropriate equipment;
  - appropriate building and finishing materials;
  - elimination of potential hazards
- The Provincial licensing regulations are “performance-based”; applications are evaluated based on how a facility will reasonably perform when in operation. Even if licensing regulations are met in absolute terms, CCFL may still evaluate if a proposed project will be licensable, based on the specific circumstances and context of the site. For example, if a proposed childcare has a sufficient amount of outdoor space (in terms of area) but the proposed layout of the outdoor space is not adequate to fit required play elements.
- CCFL provides feedback throughout development stages wherever a childcare is involved. This feedback is communicated through City Childcare staff to development coordinators and Planning staff. CCFL does not grant a childcare license until after final COV inspection, prior to occupancy.

*City Childcare Guidelines:*

- The City’s *Childcare Design Guidelines* outline principles and best design practices to help guide applicants through the planning and permitting process, from initial project inception to occupancy permit. A detailed comparison of scope is available in Appendix A.
  - In cases where achieving the intent of the guidelines is not possible, City staff work with applicants and CCFL licensing officers to ensure that, at a minimum, basic Provincial licensing requirements can be satisfied.
- The guidelines contain more detail when it comes to facility design standards. As noted, detailed analysis is provided in Appendix B.
  - The major difference between the City’s *Childcare Design Guidelines* and the provincial *Child Care Licensing Regulation* concerns the amount of outdoor play space. The City’s guidelines identify 14m<sup>2</sup> (150ft<sup>2</sup>) per child “gross” area, whereas the licensing regulation requires 6m<sup>2</sup> (65ft<sup>2</sup>) “net” area. Indoor space requirements do not differ significantly.
  - Other functional and operational design elements include contiguous outdoor space; the need for adequate and safe parking/pick-up and drop-off on site; design suggestions to minimize supervisory issues; and guidance related to detailed interior layout.

Proposed Provincial Childcare Design Standards

The Province is in the process of developing its first *Child Care Design Standards*. Status of the Provincial Standards development is below.

- The Ministry of Education and Childcare (MECC) has completed Phase 1 (“options development”) of developing provincial *Child Care Design Standards*. These standards will be used to:



- ensure that Provincial capital funding results in equitable and functional facilities; and
- support the allocation of Provincial funds to approved projects developed and/or delivered by public entities and not-for-profit organizations.
- MECC has requested City staff's review and feedback throughout its *Child Care Design Standards* development project. Staff feedback included considerations for land costs, construction costs, and forms of development, specific to high-density municipalities like Vancouver.
- Ministry approval is required to proceed to Phase 2, which will include adoption of a preferred option. MECC anticipates a decision in Spring 2023 on whether and how Phase 2 will proceed, with future implementation anticipated for some time later in 2023 or into 2024.

Provincial staff advised that it would be advantageous for the City to align its directions with any future *Child Care Design Standards*, as the City will want to ensure it is best positioned to take full advantage of future capital funding opportunities. Accordingly, unless otherwise directed by Council, staff will wait to finalize work on the Council motion until the Provincial Standards are confirmed.

Based on the Provincial Standards development timeline, staff anticipate reporting back to Council in Q4 2023.

#### Related Work to Accelerate Childcare Delivery: *Making Strides* Implementation

Alongside work on Council's motion, staff are also developing the *Making Strides: Childcare Strategy Implementation Plan* to coordinate implementation of the approved strategy. The 4-year plan is being co-developed across City departments in collaboration with key partners (e.g., CCFL, Vancouver School Board) and is anticipated to result in changes that will also improve childcare delivery. The proposed implementation plan will be presented to Council in Q4.

Implementation is envisioned to happen in three areas:

- A. Childcare Development Process
- B. Expanding Childcare Within Complete Neighbourhoods
- C. Partnerships to Expand Childcare Supply

Further information on considerations for the three areas is below:

Working Group	Key Early Implementation & Action Planning Areas to Explore	Groups Co-leading/ Represented
<b>A. Childcare Development Process</b>	<ul style="list-style-type: none"> <li>• Response to Dec 7 Council Motion, including development review streams, City review process and design guidelines/standards</li> <li>• Streamlining approvals</li> <li>• CCFL process alignment</li> <li>• Identify barriers</li> <li>• Monitor/ phased improvement</li> <li>• Clarifying requirements</li> <li>• Culturally responsive supportive development processes to support equity and reconciliation goals in development</li> </ul>	<b>DBL</b> (Building Bylaw & Permitting), REFM, PDS (Rezoning, City-Wide Planning), Parks & Rec, VCH (CCFL)

Working Group	Key Early Implementation & Action Planning Areas to Explore	Groups Co-leading/ Represented
<b>B. Expanding Childcare Within Complete Neighbourhoods</b>	<ul style="list-style-type: none"> <li>• Developing policy and tools</li> <li>• Coordinated planning</li> <li>• Integrated targets</li> <li>• Applying regulatory options, such as: <ul style="list-style-type: none"> <li>○ Options or requirements to secure childcare delivery in area plans or regulatory policy (e.g. sustainable large sites)</li> <li>○ Options to enable retention of community-based childcare</li> </ul> </li> <li>• Vancouver Plan Implementation</li> <li>• Indigenous Design Principles</li> <li>• Developing pathways for a Childcare Expansion Framework.</li> </ul>	<b>Community Planning,</b> VanPlan Implementation, <b>PDS (City-Wide Planning), BPPS; Finance;</b>
<b>C. Partnerships to Expand Childcare Supply</b>	<ul style="list-style-type: none"> <li>• Options to deliver increased spaces through local public partnerships</li> <li>• New facility and service delivery models (e.g. community ownership opportunities, civic land acquisition, employer priority, philanthropy, etc.)</li> <li>• Governance and oversight models to support expansion of Indigenous-led and culturally safe childcare (including Public Service Requirements, Operator Selection)</li> <li>• Aligning the emergent Childcare Expansion Framework with civic and partner opportunities to secure sites, and with senior government capital funding opportunities and emerging directions and standards.</li> </ul>	<b>Parks &amp; Rec; Public Lands Steering Committee (+ VBE)</b> Real Estate, Housing Policy, Financing Growth, Equity Office, Law, REFM, Supply Mgt

## NEXT STEPS

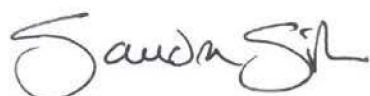
Staff will continue to work closely with MECC regarding its development of Provincial *Child Care Design Standards* as their work on new Standards will have a significant impact on how the City aligns its childcare guidelines, policies, processes, and directions with the Province.

Staff intend to report back to Council in Q4 2023 with:

- An update on the status of the work to align with the Province;
- Outcomes of work on the Childcare Strategy's early actions, and
- Recommendations for the 4-year Implementation Plan, including definitive direction on harmonizing City and Provincial childcare policies and licensing requirements.

## FINAL REMARKS

If Council requires further information, please feel free to contact me directly at [sandra.singh@vancouver.ca](mailto:sandra.singh@vancouver.ca) and we will provide responses through the weekly Council Q&A.



Sandra Singh, General Manager  
Arts, Culture, and Community Services

[sandra.singh@vancouver.ca](mailto:sandra.singh@vancouver.ca)



**TABLE 1: COMPARATIVE SCOPE of City of Vancouver Childcare Design Guidelines Relative to BC Child Care Licensing Regulation**

Area of Consideration	Key Distinctions between City and Provincial Childcare Design Standards	BC Licensing Standard - Vancouver Coastal Health Community Care Facilities Licensing (CCFL)	City Design Guidelines
<b>Key Resources</b>	n/a	<a href="#">BC Provincial Community Care and Assisted Living Act: Child Care Licensing Regulation</a>	CoV Childcare Design Guidelines (2021)
<b>Additional Design Resources</b>	n/a	<a href="#">CCFL Design Resource for Child Care Facilities</a> <a href="#">CCFL Licensing Application Guide - Group Childcare, ages 0-5</a> <a href="#">BC Child Care Facility Design Standard (potential future standard)</a>	CoV Childcare Design and Technical Guidelines (2021): (publicly available for reference, but required only for City-owned childcares)
<b>Application - Types of care</b>	While BC Licensing Regulation applies to all licensed care, City design guidelines apply only to group care for age 0-4, which generally requires the most complex facility design and development process.	All licensed care all ages, including home-based family childcare: <ul style="list-style-type: none"><li>BC Licensing Regulation sets nominally similar standards across license types on a per-child basis.</li><li>Practical application requires the most complex facility design for group care, particularly in high density contexts.</li></ul>	<ul style="list-style-type: none"><li>CoV Childcare Design Guidelines apply to new group childcare for ages 0-4 (infant/toddler, 3-5 and preschool)</li><li>Family Childcare, school age, and other license types are regulated through zoning, VBBL, etc</li></ul>
<b>Mandate</b>	While BC Licensing Regulation sets design and operational requirements for all childcare, City guidelines' purpose is more focused: <ul style="list-style-type: none"><li>to support successful initial and ongoing licensing by CCFL once occupied</li><li>to minimize use conflicts over public and shared spaces (e.g. roads, parks, common areas in mixed-use development)</li></ul>	<ul style="list-style-type: none"><li>Ensure facilities are licensed and premises, staffing, operations etc are in compliance with basic health and safety standards</li><li>Standards are performance-based and apply to fully built and staffed facilities.</li></ul>	<ul style="list-style-type: none"><li>Support development of licensable group childcare facilities from enquiry through development permitting process (enquiry, RZ, DP, BP)</li><li>Standards are prescriptive, and apply to facility designs proposed at an early stage of development.</li></ul>
<b>Key Objectives</b>	Objectives of City Guidelines and BC Licensing Regulation broadly align on facility design: <ul style="list-style-type: none"><li>Basic health and safety is the focus of quantitative standards in BC Regulation;</li><li>Functional viability and healthy child development are shared objectives of flexibly applied qualitative standards in BC Regulation (Schedule G) and of City guidelines</li><li>City guidelines further reflect municipal objectives to mitigate neighbourhood impacts, particularly in high density contexts (e.g. parking, public park access).</li></ul>	Ensure basic health and safety standards are met	<ul style="list-style-type: none"><li>Align City permitting and VCH Licensing processes to provide early assurance for childcare applicants that a licensed facility can be achieved</li><li>Provide clear area standards for BC licensing requirements with no standards identified (nap areas, kitchens, storage)</li><li>Provide specific targets to achieve healthy child outcomes</li><li>Identify outdoor play needs in high-density environments</li><li>Manage pressures on public parks and greenspaces</li></ul>
<b>How and When Applied</b>	<ul style="list-style-type: none"><li>Application of City guidelines in early development supports design of new purpose-built group childcare facilities that can achieve and maintain a BC license (including in complex mixed-use and high-density contexts) to minimize both licensing uncertainty and negative neighbourhood impacts.</li><li>City Guidelines are applied flexibly to guide planning and permitting of new group centres from initial design to occupancy permit. BC Licensing Regulation is applied later in development, with licensed capacity issued once a facility is built and furnished. Some aspects of the BC Licensing Regulation are applied flexibly and others are not.</li></ul>	CCFL determination of licensing and maximum capacity is performance-based. <ul style="list-style-type: none"><li>Final assessment of licensability and capacity after occupancy</li><li>Assessment of licensability varies considerably across sites</li><li>BC Licensing Regulation sets operational requirements including daily outdoor programming. However VCH Licensing review does not consider or review permissions for operations to access land, including proposed regular access to public land and parks.</li></ul>	<ul style="list-style-type: none"><li>City Guidelines and by-laws set prescriptive, consistent area and design standards, to offer greater development certainty and guide proposals at early stages.</li><li>Guidelines are applied flexibly to all new group childcare proposals serving ages 0-4, to support all projects to meet the intent of the guidelines to the fullest extent possible based on site conditions and contexts. A high degree of flexibility is applied for childcare proposed in existing buildings.</li></ul>
<b>How Reviewed</b>	City and VCH staff work together at Development Permit stage to coordinate and align City and early Licensing reviews.	<ul style="list-style-type: none"><li>VCH CCFL offers comments on proposed childcare development plans at the Development Permit stage</li><li>Licensing capacity is determined once a facility is fully occupied, staffed, and furnished</li><li>Licensing officers visit a childcare facility once it is fully built, staffed, and furnished, to determine if a license can be issued for the proposed operations, and for how many children.</li></ul>	<ul style="list-style-type: none"><li>Advice and direction is provided by City Staff through early enquiry and/or rezoning processes</li><li>Final application of Childcare Design Guidelines is at the Development Permit (DP) process.</li><li>VCH CCFL is identified as a review group at DP process.</li></ul>



TABLE 2: COMPARATIVE STANDARDS AND APPLICATION of City of Vancouver Childcare Design Guidelines Relative to BC Child Care Licensing Regulation

Standard	Analysis of differences, application and rationale	BC Licensing Standard	City Design Guidelines
<b>Indoor Area Standards - ACTIVITY AREAS</b>	City Guidelines functionally align with BC Licensing Regulation <ul style="list-style-type: none"> <li>City Guidelines space standards appear slightly larger due to measuring gross area rather than net area, reflecting the timeline of City review at DP stage, prior to construction and furnishing.</li> </ul>	BC Net Indoor Activity Area Standards <ul style="list-style-type: none"> <li>3.7 m<sup>2</sup>/child, all ages</li> <li>Licensing excludes door swings, circulation, furniture and equipment from Activity Area calculation once space is occupied.</li> </ul>	COV Net Indoor Activity Area Guidelines <ul style="list-style-type: none"> <li>Age 0-3 = 4.13 m<sup>2</sup>/child</li> <li>Age 3-4 = 4.56 m<sup>2</sup>/child</li> </ul>
<b>Indoor Area Standards - SUPPORT AREAS</b>	City guidelines functionally align with BC Licensing Regulation, with some minor differences <ul style="list-style-type: none"> <li>City Guidelines space standards appear larger due to including estimated area to meet mandatory licensing standards, whereas BC Licensing Regulation does not identify areas for required support functions.</li> <li>Minor differences pertain to specific support areas recommended in City Guidelines which are not mandatory in BC Licensing (e.g. parent rooms)</li> </ul>	BC Regulation does not provide area standards for MANDATORY support areas including kitchen, washrooms, nap rooms, office, laundry, janitorial, storage, garbage, staff room, office. Functions are specific and required: <ul style="list-style-type: none"> <li>e.g. washrooms require 1 toilet and 1 sink per 10 children, in a design that allows staff to supervise children accessing washrooms</li> <li>e.g. nap rooms /sleeping areas: Separate sleeping area located away from any activity area and within sightlines of operators; for children under 36 months must accommodate 12 cribs/mats</li> </ul>	Minimum recommended areas identified for required support spaces, estimating space required for functional delivery of Licensing Requirements  COV Indoor Support Area Guidelines <ul style="list-style-type: none"> <li>Age 0-3 is 5.3 m<sup>2</sup>/child</li> <li>Age 3-4 is 2.66 m<sup>2</sup>/child</li> </ul>
<b>Outdoor Area Standards</b>	City guidelines apply a flexible gross area standard that exceeds strict net minimum area standard in BC Regulations, to address objectives including: <ul style="list-style-type: none"> <li>Healthy child development (evidence for physical, mental health)</li> <li>Functional viability (ability to meet BC standard for outdoor play)</li> <li>Minimizing public park impacts (if site below licensing standard)</li> <li>Licensability (supporting intended capacity)</li> <li>City standards are applied flexibly based on site limitations, and measure gross area, reflecting City review before construction</li> </ul>	BC Net Outdoor Activity Area Standards: <ul style="list-style-type: none"> <li>6m<sup>2</sup>/child minimum (net)</li> <li>Licensing will exclude furniture, storage, and fixed equipment from Activity Area calculation</li> <li>Multiple groups of same age/license type may be allowed to share play space if Standards of Play regulations can be met (performance based)</li> </ul>	COV Gross Outdoor Activity Area Guidelines <ul style="list-style-type: none"> <li>10.5 - 14 m<sup>2</sup>/child (more space recommended for older/more active children)</li> <li>COV gross area count includes all furniture, equipment</li> <li>For Existing Buildings: <ul style="list-style-type: none"> <li>15% reduction allowed (12 m<sup>2</sup>/child)</li> <li>Additional reductions considered for efficient design</li> <li>OR Space may be shared between up to two programs of same age/ license (gross area of 7 m<sup>2</sup>/child)</li> </ul> </li> </ul>
<b>Outdoor Areas – Potential Offsite Activity Areas</b>	<ul style="list-style-type: none"> <li>City guidelines functionally align with BC Regulations, with some additional guidance to minimize use conflicts in public parks</li> <li>While BC Regulations offer no specific requirements regarding ownership of land, City guidelines seek ability to meet licensing requirements onsite for full-day childcare, applied in alignment with Vancouver Parks and Recreation policy for use of public parks.</li> </ul>	Offsite play area considerations are performance-based and not finalized until occupancy. Considerations include crowding/capacity, proximity, ease and safety of access and: <ul style="list-style-type: none"> <li>Can meet daily Standards of play, age-appropriate equipment</li> <li>Safety of offsite play space (other users, near traffic/noise)</li> <li>Ability to maintain required staff ratios (to supervise children)</li> <li>Supports (e.g. WC, drinking water, barriers from traffic/users)</li> </ul>	Primary (daily) outdoor play offsite allowed for preschool, but not for full-day care. <ul style="list-style-type: none"> <li>Supplementary (occasional) outdoor play offsite to allow a reduction in onsite space may be considered if proposed offsite space has sufficient capacity (in consultation with Parks), and is considered suitable for childcare use (as per CCFL criteria)</li> </ul>
<b>Other Design Considerations (beyond area standards)</b>	<ul style="list-style-type: none"> <li>City guidelines functionally align with BC Regulations, with some additional guidance to support functional viability</li> <li>City guidelines are flexibly applied considering site limitations to encourage contiguous indoor and outdoor areas. This supports feasible operations to meet BC Regulation operational standards.</li> </ul>	<ul style="list-style-type: none"> <li>In addition to strict regulations on space requirements, staffing, and program size, BC Licensing Regulation provides advice on <ul style="list-style-type: none"> <li>Best practices for program activities</li> <li>Identifying reportable incidents</li> </ul> </li> <li>Operational requirements include daily outdoor programming</li> </ul>	<ul style="list-style-type: none"> <li>Design performance (staffing optimization, supervisability)</li> <li>Contiguous on-site indoor-outdoor space standard</li> <li>Optimal configurations of age groups to ensure operational viability and sustainability</li> </ul>
<b>Parking</b>	While the City regulates childcare parking through its Guidelines, parking is not a consideration of the BC Licensing Regulation.	Not a Licensing consideration, beyond safety of access.	Parking Bylaw refers to Design Guideline requirements: <ul style="list-style-type: none"> <li>staff parking (2 per group care facility)</li> <li>pickup/drop-off stall per 8 childcare spaces in program</li> <li>Staff are exploring consolidated requirements in Parking Bylaw, with standards for family and school age care.</li> </ul>
<b>Suitable Siting (e.g. adjacencies, height above grade, air quality, noise)</b>	Considerations regarding suitable siting are complex in both BC Licensing Regulation, and City policy and regulation (Design Guidelines, Zoning and Development By-law and Building By-law): <ul style="list-style-type: none"> <li>Childcare license may be denied on BC Regulations basis of site safety. City standards are applied early across departments and with VCH to minimize risk of late identification as unlicensable</li> </ul>	<ul style="list-style-type: none"> <li>Licensing requirement and concern, but few clear regulations. Performance/ Outcomes based (e.g. no height maximum, but evacuation plan must be approved by Licensing.) In some situations, an approved safety plan may be too onerous to achieve</li> <li><a href="#">VCH Fact Sheets</a> address childcare-specific consideration including noise pollution, traffic-related air pollution, wildfire smoke</li> </ul>	Conditional use in almost all zones, including light industrial, and some medium industrial zones. City staff work across departments to assess site suitability considerations and to apply internal guidelines for maximum traffic, adjacent uses, maximum height to ensure safety in emergency evacuations