



Virginia



ENTITLEMENT Report | MARCH 2021

ULI VIRGINIA MEMBERS REPORT ON: THE STATE OF DEVELOPMENT ENTITLEMENTS IN THE COMMONWEALTH

About the Urban Land Institute

The Urban Land Institute is a global, member-driven organization comprising more than 45,000 real estate and urban development professionals dedicated to advancing the Institute's mission of providing leadership in the responsible use of land and in creating and sustaining thriving communities worldwide.

ULI's interdisciplinary membership represents all aspects of the industry, including developers, property owners, investors, architects, urban planners, public officials, real estate brokers, appraisers, attorneys, engineers, financiers, and academics. Established in 1936, the Institute has a presence in the Americas, Europe, and the Asia Pacific region, with members in 80 countries.

More information is available at uli.org. Follow ULI on Twitter, Facebook, LinkedIn, and Instagram.

About ULI VIRGINIA

Here at the Urban Land Institute, our mission is to provide leadership in the responsible use of land and in creating and sustaining thriving communities. ULI Virginia carries forth that mission by serving the Hampton Roads, Richmond, and Charlottesville markets in both public and private sectors, with pragmatic land use expertise and education.

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Overview of Program

The intent of this program was to obtain input from a cross-section of ULI membership to explore how differences in local government structure and departmental organization impact the effectiveness of the entitlement process and the quality of constructed outcomes for development projects. The input from this initial exercise will help inform a continuation of this discussion with members and as part of future programs inviting community input from representatives of the development community, local government, and community advocates.

Background

Local governments around the country operate under various forms of government with many different approaches to internal organizational structures and how land development codes and plan review are managed. It is a reality within the real estate industry there are perceptions that jurisdictions manage the plan intake, review, and approval process with varying degrees of success. This perception will vary depending upon the viewpoints of the various participants and stakeholders in the process including:

- Mayors, City and County Managers
- Planning Commission / Board Members
- City Council / County Board of Commissioners
- Developer / Landowner / Applicants
- Retail Merchants / Homebuilder Organizations
- Design Review / Architectural Review Boards
- Community Residents / General Public

STUDY INTENT AND METHODOLOGY

ULI Virginia organized a small group of members who expressed an interest in issues around the entitlement process through the lens of their broad individual roles and association with typical land development projects. This group was tasked to define a problem statement to guide initial efforts to examine how various jurisdictions approach entitlements and to identify lessons learned from personal involvement with active or completed projects. This effort was initiated with the understanding that the findings would not be comprehensive or definitive in any way but

More often than not, the entitlement process for a proposed development may require a developer to navigate many layers of governmental and public approval including staff review, various boards and commissions, public input, and legal review.

serve as the basis for continued examination with expanded participation within ULI and from interested communities across the Commonwealth. This conversation may take the form of broader ULI program events or be examined in more detail as part of a comprehensive ULI Technical Assistance Panel (TAP).

In 2020, focus group met virtually over the course of a nine-month period to share experiences from each members' frame of reference. In addition, a survey was distributed to the study participants to generate additional input, to help identify other issues not captured in the meetings, and to identify the highest priority issues from those responses. Key issues from each discussion and the survey were recorded and organized in the form of the findings documented in this report.

Problem Statement

For developers and design professionals working across many jurisdictions within Virginia and beyond, the process of getting through plan reviews and approvals can vary considerably. Often the project design, proforma and schedules must be tailored to consider the anticipated cost, timeline, impacts of multiple staff review cycles, public hearings, and community involvement. The review process, including some level of community engagement is, without question, necessary, important and valuable on many levels. Many factors contribute to the efficacy of the entitlement process which leads to some interesting questions regarding what factors are most important to create successful outcomes. For this effort, the conversation was centered around the efficacy of the process toward predictable outcomes and exploration of the conditions that appear to foster better results. What conditions and what factors create the best correlation between cost in real dollars, time, and human capital resulting in better development and better communities? What conditions suggest the squeeze is worth the juice? What best practices can be identified across many jurisdictions that consistently produce the best results, and how do we measure success?

Discussion Points

A stated goal was to identify key questions that might be explored in more detail as the conversation is expanded to a broader group. The following questions reflect key issues surfaced as fundamental to the conversation around entitlements:

1. How does internal organizational structure impact the efficacy and

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design outcomes from the plan review and entitlement processes? Is one internal structure more likely to produce better results than another?

2. What role, if any, does the form of city or county government play in the ability to execute an effective entitlement process? Is one form of government more likely to produce better results?

3. What are the key determinants in the process that yield the best results?

Management responsibility: Which department is on point and where does the director position reside?

Departmental coordination in the review process?

Staff quality and expertise?

How consistently and objectively is the code applied to plan review?

Level of community involvement?

Level of staff authority to review and approve plans?

Level of review by Boards, Commissions, and Council?

4. How does the community involvement process impact the process and quality of the end product?

5. How do we measure the success of our entitlement processes?

Overall time from application to permits?

Quality of the end product?

Satisfaction of the community?

Overall cost-dollars, energy resources, human capital - to execute the process?

Program Participants

ULI members participating in this process included representation from the following stakeholder groups:

- Chesterfield County staff / elected officials
- Henrico County staff / elected officials
- City of Richmond staff / elected officials
- Outside of RVA MSA (Raleigh; Norfolk)
- Architect / Engineer / Landscape Architect
- Land Use Attorneys
- Neighborhood organization



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I. INTRODUCTION/EXECUTIVE SUMMARY

This initial report of findings is the product of an initiative to understand the efficacy and impacts to the real estate industry resulting from a wide range of local government approaches to plan review and entitlements for land development projects. The effort was launched by members of the Virginia District Council of the Urban Land Institute as a fact-finding mission to identify key determinants in predicting the success in the process to use as a basis of an expanded conversation around the impact of entitlements on the industry and on our communities.

Launched in late summer of 2020, the study included candid conversations amongst the participants which included a cross-section of design professional, land use attorneys, local government officials, developers, and other stakeholders who regularly engaged in real estate. The group conducted research from peer communities within and beyond Virginia and conducted a written survey among the group participants to help identify the highest priority issues for further exploration. The focus group held a series of discussions to better understand how entitlements are secured for development projects, to identify the basic indicators for success, and to consider how the process might be improved in the Commonwealth.

The process helped us identify several issues we found to be fundamental factors in influencing how effective the entitlement process is implemented across jurisdictions including the following:

1. Organizational structure
2. Quality and clarity in land development codes and design guidelines
3. Staff size and quality / experience
4. Level of community involvement and how community input is used in decision-making
5. Level of review and approval authority by elected officials
6. Impact of proffers

Entitlements can be a major factor in the ultimate use, viability, and value of your property.

II. PREVIOUS RESEARCH

Entitlement laws and administration of codes and regulations have been established for community law and order. Laws and their administration have been studied as matters relating to private property rights and public planning for health, safety and welfare.

The experience of taking a land development project from pre-submittal to plan submittal through final approvals varies widely across the jurisdictions in Virginia and nationwide. The focus group brought personal experience from many jurisdictions to help identify various ways local government defines and administers the process. This provided us context from peer communities and anecdotal references to jurisdictions the group found to be either fair and consistent, or challenging to navigate.

In addition to the personal experiences of the focus group members, research findings to inform this effort included review of several sources including:

1. The foundation of land use law (common and statutory) in America and particularly in Virginia
2. Early studies and enabling statutes
3. Planning Advisory Service and Zoning Practice publications
4. Studies of codes and administration: scorecards, ratings, model flowcharts, etc.

Materials found in this present study have been collected and evaluated for application and best practices for Virginia localities.



Every place is different
and has their 'thing'.



III. KEY DETERMINANTS IN SUCCESSFUL OUTCOMES

A. LOCAL GOVERNMENT STRUCTURE & ADMINISTRATION

Organizational structure and administration of the code

The focus group referenced their broad experience to identify the importance of how local government is structured as a key factor in the success of the entitlement process. The organizational structure, ultimate responsibility for final interpretations, level of coordination between departments, and the size and capabilities of staff are all interrelated factors affecting the efficacy, and predictability of the process.

- **Plan Review Responsibility and Flow Chart**

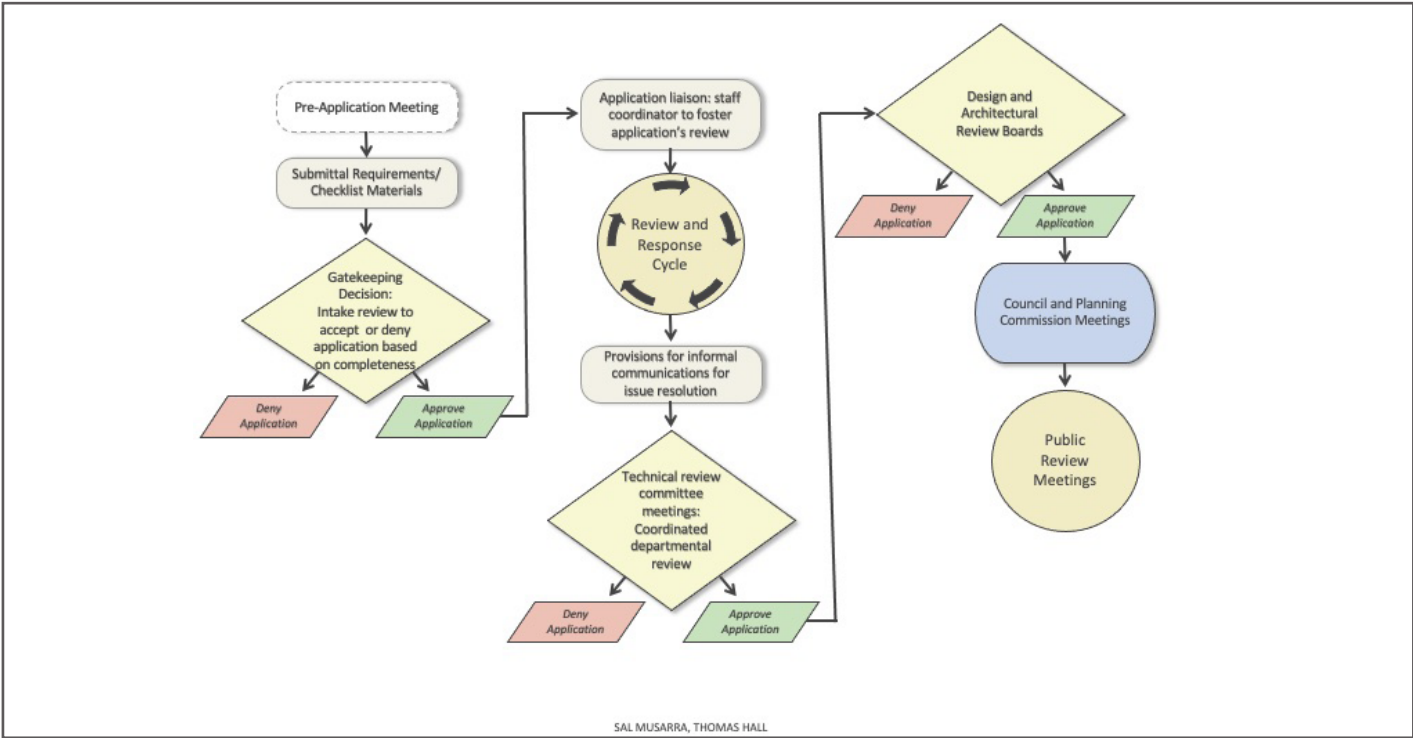
In many jurisdictions the Planning Director, or equivalent, is the final say and interpreter of the code as is applied to review of and development applications. At times, this works well but in large municipalities that individual can be a hurdle in the review process simply based upon the number of competing responsibilities on that individual's desk. A sound development code will clearly outline the entitlement process and have clarity regarding the application flow and how disputes are settled. In locations with experienced senior staff and a well-defined process, most issues and review comments can be resolved below the Director's level, saving time and reducing the load at the top of the chain for constant interpretations. A clearly defined process for intake and pre-submittal requirements is also a predictor for a more efficient process. If applicants can better understand what materials are required for intake and for a better, more complete first review, they can focus on submitting more detailed and complete applications and limit the number of review cycles.

Some municipalities have a dedicated individual (sometimes referred to as an intake official or development coordinator) to foster dialogue between the developer and the various departments and agencies required to sign off on applications (see Figure 1). Participants noted that this coordinator role can be of great benefit to facilitate the process and limit miscommunications conflicting interpretations between agencies

and departments. This is most helpful on large, complex projects, which leads to a discussion of the benefits for having a simplified review track option for small projects. This coordinator position, in some localities, is responsible to stay with an application from pre-submittal through final approvals including land development permits, building permits, and platting. They are also charged with making sure that departments are coordinating their review comments to limit conflicting direction, a common cause for delays and frustration in the process.

In some cases, the City Council or County Commissioners are more heavily involved in site plan review and approvals. This is potentially the most challenging scenario for applicants in terms of time, cost, and predictability as approvals are more subject to the political environment. In these cases, staff is used as the technical support for elected officials. It is not uncommon in these conditions for the elected body to dismiss staff recommendations on applications, complicating the process and impacting how staff conducts their duties. In places where site plan applications require administrative approvals only, the process tends to be more compact and less costly.

There are also small communities, or large communities with staff limitations, that choose to outsource plan reviews to a third party in the private sector or to the staff of a Planning District Commission (PDC).



- **Level of Review by Elected Officials**

Political pressures are a main concern with this process, including the influence of community input. In most codes, the approval of a site plan application must be obtained, assuming the application is compliant with zoning and any conditions of the zoning, and meets the requirements defined in the code. The challenge becomes how the insertion of elected bodies injects more subjectivity in the process, extending the timeline as all parties work through details and requested exactions necessary to satisfy everyone to reach the point of approval.

- **Effective departmental coordination**, or lack thereof, is consistently identified as a challenge with the entitlements process. Plan reviews are often done in a vacuum and reviewer comment submitted in the absence of consideration for other departments or committed zoning conditions resulting on conflicting interpretations or asks from staff. This, in turn, requires time and resources of the applicant and staff to resolve these issues, often by chasing down individuals on staff and reviewing with them the comments of others. Most municipalities offer some form of review committee where the applicant can discuss staff comments with representatives from all key departments and have real-time dialogue between dissenting views. This is a critical step but typically occurs just once early in the review process. Again, the use of an application coordinator can be very helpful to resolve conflicts between departments throughout the process and be the liaison between staff and applicant.

- **Staff size and quality, and experience** is another key factor and indicator for success. Staff size is easy to understand as a limiting factor in processing applications and is sometimes the trigger condition for outsourcing plan reviews. Staff quality and experience is a more complex issue to assess and can be viewed from a couple of angles:

1. **Clarity of responsibilities:** applicants often comment staff is over-stepping their authority or injecting too much subjectivity into interpretation of code. While this may be the case at times, we should acknowledge this condition may be the result of a lack of clarity in the role of staff within the process as relates to the procedures established in the code, the legal rights of applicants as relates to code, and the responsibilities of the applicant to be code compliant. Staff must be properly trained to identify the difference between expressing an opinion or preferred approach to plan elements versus an accurate assessment of whether plan elements meet expressed, written requirements in the code. While there is often some level of interpretation as to whether or

not a plan complies with some aspect of code, there are metrics and performance measures that should not be in question. For example, a staff comment to add more trees, or orient buildings a certain way, might be valid if directly referenced to a code requirement or objectives of an adopted plan or policy. If not, it is simply a suggestion to be taken into consideration by the applicant and may, in fact, result in positive changes to an application. A positive way to manage these expectations is to require all staff comments to either reference a direct requirement (section and sub section, etc) supporting the comment or to label the comment as “recommend or requested”. Thus, the applicant understands it is a requirement to be met or a recommendation for consideration that will not hold up approval. From staff perspective, it requires an understanding of responsibilities that would not be described as designing the project to meet subjective views about development, but rather to review the application through the lens of the code to ensure compliance.

From a legal perspective, it is important the staff understands and follows the entitlement process as defined within the code. This is essential as every applicant has the right to expect the process is executed fairly and consistently at all times for all applications. There is a burden on staff to intake, review, and comment on applications compliant with the code including how meetings are scheduled and conducted, how communications are managed internally and externally with staff, applicants, and the community, and how code interpretations are made. This is challenging but there is case law where applicants have initiated litigation, and won, for what they deemed arbitrary and capricious application of the process.

2. **Familiarity and experience with the code** is an important factor in the effectiveness of staff to manage the review process and toward consistent application of code. As stated above, the elimination of subjectivity in site plan reviews is important and requires staff to be intimately knowledgeable about the applicable code. To this end, whether a code is traditional, form-based, or hybrid can dictate the experience need by staff to effectively apply it to applications.

B. TYPE & QUALITY OF LAND DEVELOPMENT CODES AND ORDINANCES

The quality of our codes in terms of content, organization, and overall ease-of-use is a critical factor in the entitlement experience. Many codes evolve over the years with numerous modifications and text changes and result in conflicting or antiquated language that persists until a complete re-write is undertaken. The more complex a code is to digest and understand by staff, applicants, elected officials, and the general public, the higher the likelihood of challenges and delays in the entitlement process.

- **Clarity and ease of comprehension:** Codes with complex cross-references and unidentified references to external adopted plans or guidelines increase the likelihood of applicants missing key requirements resulting in applications with flaws or incomplete information. At times staff has as much difficulty as applicants in understanding code details and identifying all of the many references required to prepare a site plan or review them. In addition, engaged citizens who typically spend far less time reading and applying code to development projects are at a bigger disadvantage if they desire to follow a project and make public comment on how it complies with the code.
- **Form-based vs traditional:** This effort did not focus on the detailed differences between the types of codes but did identify this as an issue impacting how effectively the entitlement process can be implemented. Form Based Codes (“FBCs”) are an alternative to traditional Euclidean zoning systems and have been growing in popularity over the past several decades. FBCs generally aim to provide a more predictable process and more predictable outcomes for the physical form of development. Rather than focusing on the separation of permitted land uses, FBCs primarily regulate the physical form of development. For example, FBCs may stipulate specific building locations, heights, and façade requirements but simultaneously reduce the specificity of the uses allowed within buildings.

There are now more than 600 FBCs in place or in the process of adoption nationally and approximately 15 of those are in Virginia jurisdictions.¹ Notably, Arlington’s Columbia Pike Commercial FBC and, subsequently the Columbia Pike Neighborhoods FBC were considered pioneering, model FBCs at their adoption and both continue to provide strong examples of robust, working FBCs today. Other notable FBCs

1 The Codes Study, <http://www.placemakers.com/how-we-teach/codes-study/>

have been adopted in Hampton Roads and Richmond, including the Oceanfront-Resort (OR) FBC overlay in Virginia Beach and the forthcoming FBC that is being rolled out through the recently approved Richmond 300 Plan.²

³In both of these instances, the FBC is used in specific, denser portions of the municipality as more of an overlay rather than a complete rewrite of the zoning code.

For examples of more FBCs in Virginia and nationwide, and to learn more about the fundamental characteristics and features of FBCs, the Form Based Codes Institute provides helpful resources at www.formbasedcodes.org.

A more predictable, less onerous entitlement process is a fundamental goal of most FBCs. While many exist as alternative or “optional” entitlement methods available to applicants in tandem with an underlying traditional zoning ordinance, FBCs usually aim to provide an expedited or simplified process for those projects that opt to comply with an FBC’s

objective standards regulating physical form of development. Throughout the Commonwealth these FBCs are predominantly used in areas where mixed-use development is already happening or being encouraged to happen, making the FBC a better governing system. While other states are utilizing FBCs more holistically, Virginia remains tied to the Euclidean system with specific areas of FBC acting in place of traditional Mixed-Use zoning districts.

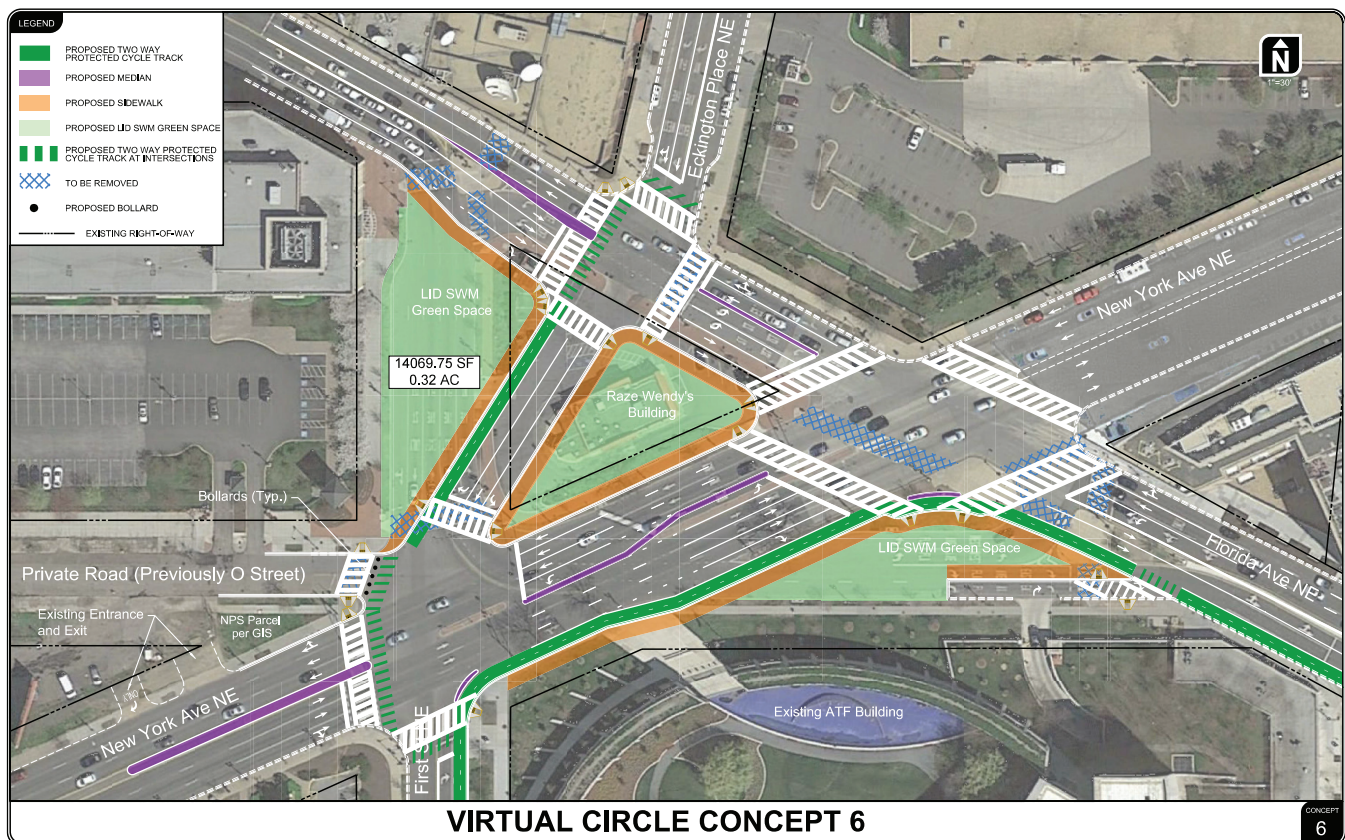
In reality, FBCs’ capacity to deliver a shorter or more predictable entitlement process varies from locality to locality. Different FBCs provide varying degrees of deviation from a locality’s traditional entitlement process with the degree of variation sometimes depending on the particulars of each potential project. For example, projects of a certain size may be subject to all or parts of the ordinary, traditional entitlement process even if they elect to seek entitlement under the FBC. Other times, FBCs provide an expedited process only for projects that do not require any modification or variance from the physical form regulations of the FBC. The survey associated with this project aims to collect additional information regarding the perceived effect of FBCs on the entitlement process for Virginia localities in which they exist.

2 Oceanfront Resort District Form-Based Code, <https://www.vbgov.com/government/departments/sga/projects/Pages/Oceanfront-Resort-District-Form-Based-Code.aspx>

3 Richmond 300, <http://www.richmond300.com/marketingMaster-Plan/final>

- **Design Guidelines and architectural review boards:** The focus group did not debate the need or value of having design guidelines or appointed boards and commissions to review and make recommendations regarding site plan applications. They did however identify the existence of these protocols as inputs that can complicate the process in terms of extending the timeline and introducing conflicting ideas requiring resolution among multiple parties and stakeholders. Similar to inter-departmental coordination, the addition of external review bodies can be challenging for the jurisdiction and the applicant for a variety of reasons:

1. These inputs often involve additional adopted guidelines and requirements outside of the development code (i.e Design Guidelines, Street design Manuals) adding an additional layer of cross referencing and potential for conflicting language.
2. The authority of these review bodies can vary greatly across jurisdictions but in many cases they are simply advisory in nature and introduces significant subjectivity that can be broadly dismissed by staff and elected officials or overly influential and crafted by community pressure or political environment. This level of input can result in very positive changes to applications as well, but a lack of clarity in authority and potential for conflicting direction introduces potential challenges to the predictability of the process.



- **Proffers are conditions offered by landowners or developers during the entitlement process**, such as the donation of money, land, constraints on the property, or services, which serve as a means to mitigate or address impacts caused by the proposed rezoning. They are made voluntarily and, if approved by a locality, become part of the zoning governing the property and continue to run with the land until there's a subsequent change in entitlement. In the Virginia Code, proffers are referred to as "conditional zoning," defined as "the allowing of reasonable conditions governing the use of such property, such conditions being in addition to, or modification of the regulations provided for a particular zoning district or zone by the overall zoning ordinance."¹

While defined as voluntary offers to mitigate development impacts, some now perceive proffers as a tool for negotiation by localities in the entitlement process. Where the needs and desires of localities vary, some developers associate proffers with uncertainty as to "what" and "how much" may be requested for a proposed development. Negotiations on an application-by-application basis often leads to further uncertainty for developers as they approach a new rezoning application.

In fact, proffer requirements and processes often do differ from county to county. For example, most development in Arlington

¹ Va. Code Ann. § 15.2-2201 (2016).

“Sustainable development is a pattern of resource use that aims to meet human needs while preserving the environment so that these needs can be met not only in the present, but also for generations to come.....” – The Brundtland Commission

County is either “by-right” or done through the site plan process where negotiation is done “through a defined protocol.”² As a result, Arlington County uses proffers far less than its neighboring jurisdictions mainly because proffers are more prevalent in localities with developments planned on larger areas of land.³ On the other hand, there are similarities in proffer requirements across counties as well. For instance, both Fairfax County and Loudoun County include zoning ordinance sections dedicated to proffered condition regulations and entitlement regularly involves such proffers. In these jurisdictions, proffers are offered before public hearing for entitlement and amended proffers may be accepted after the public hearing if such amendments don’t materially affect the overall proposal. In 2016, the General Assembly adopted the Proffer Reform Law (“PRL”), codified in VA Code § 15.2-2303.4. For new residential developments, the PRL required that offsite proffers must be specifically attributable to the proposed development and must address an impact to an offsite facility. By all accounts, the PRL significantly restricted the developers’ ability to proffer a range of different options to mitigate community concerns, and made the localities’ ability to work cooperatively with the owner/ developer much more difficult because of increased legal penalties for “suggesting” proffers that could not be accepted.⁴ In 2019, the General Assembly enacted an amendment to the PRL removing the prohibition on suggesting unreasonable proffers and limitations on off-site proffers and largely restored the proffer negotiation process to the prior status quo.⁵

² InsideNova, Arlington: Proffer legislation not a big issue for us, (February 26, 2016), https://www.insidenova.com/news/arlington/arlington-proffer-legislation-not-a-big-issue-for-us/article_05be65cc-dc7d-11e5-9f48-e3ff79cfc1b3.html

³ Id.

⁴ <https://www.fairfaxcounty.gov/boardofsupervisors/sites/boardofsupervisors/files/assets/meeting-materials/2020/nov24-legislative-draft-2021-ga-legislative-program.pdf>

⁵ David McAuley, Virginia just passed a law that removes a barrier to building more housing, Greater Greater Washington (March 20, 2019), <https://gwwash.org/view/71307/virginia-general-assembly-fixes-the-reform-on-residential-proffers>; see also Fairfax County Board of Supervisors’ Legislative Committee, Overview of Proffer Legislation, (January 18, 2019), <https://www.fairfaxcounty.gov/boardofsupervisors/sites/boardofsupervisors/files/assets/meeting-materials/2019/jan18-legislative-handout-proffer-legislation-overview.pdf> 2019 General Assembly (GA)

- **Affordable Housing Requirements / Initiatives:** The need for affordable housing across the commonwealth is well documented. The National Low Income Housing Coalition (NLIHC) estimates a deficit of 188,000 units across the commonwealth. Several factors drive this increase: It is estimated the commonwealth's population will grow by 22% by 2030. Housing production costs continue to increase quicker than median income and can be exacerbated by localities' administrative fees and additional infrastructure enhancements. As Virginia's economy continues to grow and diversify, the availability of quality, affordable housing proximate to employment and educational opportunities will continue to be a critical measure of a community's vitality.

In 2018 Governor Northam signed Executive Order # 25 that acknowledges the shortage of affordable housing especially for lower wage earners or those with special needs and the potential it has to contribute to housing instability and homelessness. It goes on to "commit to fostering inclusive communities through the deconcentration of poverty and efforts to ensure fair housing is a priority." Despite the Governor's support of affordable housing, the barriers to increasing the supply abound. There are surely market driven factors such as the availability of development-ready sites, cost of land, rapid increase in hard costs, and diminishing base of reliable sub-contractors.. A real and more insidious factor is the NIMBYism (Not in My Backyard). When projects are going through the rezoning process, if local neighborhood opposition is loud enough, it is more common than not that the deal will not be supported by staff or the elected official. The appropriateness of the proposed development should not be determined by the target market or the financing sources, which often are veiled attempts to keep out lower-income populations.

On the entitlement side, some localities require cash proffers and this can add significant cost to a project. While cash proffers are one solution to growing populations and the strain placed on municipality services, they disproportionately impact affordable communities that have strict cost limits and financing requirements. A recent example in Chesterfield County would result in proffers in excess of \$1 million, a burden that the proposed affordable community would be unable to bear. It is not unusual for other design or infrastructure requirements to be imposed such as costly architectural elements, improvements to public right of way, or other amenities that serve the public, all adding to the overall cost of the development.

While development of any kind is difficult, the development of affordable housing is already at a disadvantage compared to other development types.

C. COMMUNITY INVOLVEMENT

Most participants acknowledge the value of good, well-managed community involvement in the review of key development projects. The common concern is generally related to the level of that engagement, the impact on timeline and costs, and the amount of influence around issues that are not directly tied to code requirements.

Community engagement comes in many forms during the entitlement process:

- Mandated public hearings
- Open, “public speaks out” agenda during council or commissioner meetings
- Code-mandated applicant informational meetings with affected neighborhoods
- Informal meetings between applicants and community stakeholders
- Unsolicited community input to staff or public officials

Some codes do a good job specifying how and when an applicant must engage the public but many do not offer clarity leaving an applicant subject to randomness in the process. Generally speaking, the public is not focused on code-compliance in their commentary but typically more subjective metrics and performance criteria that often suggests some form of plan modifications not related to strict compliance with code. Again, these requests may represent positive improvements to an application but the lack of predictability or ability to manage those requests within the review process can be problematic.

There are many ways to engage the public in the process and it warrants deeper conversation to determine how best to realize the value of the engagement proportionate with the impact on the process.

Summary

These findings are very high level but begin to set up a framework for future, more detailed, discussions around the state of entitlements in the Commonwealth. With demonstrated interest from the stakeholders who are most affected by these issues, ULI Virginia will seek to advance the conversation to explore best practices and recommendations to improve how entitlements are managed to the benefit of all parties in keeping with core ULI mission to help shape the future of the built environment for transformative impact in our communities.