April 1, 2019

City of Vancouver Mayor & Council

Dear Mayor Kennedy Stewart and Councillors,

Re: Amendments to "Outright" Duplexes - RS, RT & RM Zones

Agenda April 2, 2019: https://council.vancouver.ca/20190402/phea20190402ag.htm

Report: https://council.vancouver.ca/20190312/documents/p1.pdf

Summary: https://council.vancouver.ca/20190402/documents/phea3Summary.pdf

Zoning Bylaw Changes: https://council.vancouver.ca/20190402/documents/phea3draftbylawZD.pdf

The Coalition of Vancouver Neighbourhoods (CVN) does not think these proposed amendments are ready for approval and request that they be referred back to staff for more work and involvement of the neighbourhoods and stakeholders affected.

Given that the city is going into a city-wide planning process, we do not understand why the Making Room Program is still operating and bringing forward reports for substantial changes to zoning without any public involvement. **The Making Room Program should be suspended** and further planning with meaningful consultation and community input be integrated into the city-wide planning process.

The proposed changes are not minor amendments as they have substantial impact on the zones involved. There has been no public consultation on these significant changes.

It is not proper planning process to omnibus multiple zoning changes for multiple zones together in one report. Each zone is affected differently by the changes and the report fails to explain what those impacts are. It is almost impossible to follow the proposed bylaw changes when mixed together like this, even for those with a planning background.

Each RS, RT and RM zoning change should be dealt with separately to show the impacts of the proposed changes, with the existing zoning bylaw showing strikeouts and additions clearly.

Although some of the changes to dormer roof design and duplex entrances seem reasonable, the impacts on above grade FSR, increased building envelope bulk, increased building depth, decreased rear yard setbacks, covered front porch encroachments into front yard, flat roofs and other changes are problematic.

It appears that a new type of outright duplex Vancouver Special is being created with a maximized scale of envelope. Duplexes should be conditional, not outright, to ensure design compatibility with neighbourhood context and streetscapes.

These changes seem to be bringing back the most problematic aspects of the duplex zones that existed in the 1980s. For example, RT7 & RT8 in Kitsilano, RT6 in Mt. Pleasant and others, with design guidelines, were brought in to counter just this kind of outright zoning because it led to too much demolition and incompatible new development.

The proposal to allow slab-on-grade all above-grade FSR on 33 ft. lots for outright duplexes creates too much building mass while wasting space in a crawl space rather than a usable basement. This is further impacted by

covered front porches that extend into the front yard setbacks, enlarged building depth, reduced backyard setbacks, and enlarged third floor FSR.

The proposed changes also become a further incentive to demolish with more incentives for new development rather than retention options. The zoning advantage is being significantly tilted towards demolition and new construction. This is not a green or sustainable model.

Creating a cookie-cutter outright design city-wide in multiple zones does not take into consideration neighbourly fit based on current context and streetscapes.

The way to improve processing times is to integrate a more effective review process and transparent design expectations in design guidelines. It should not be about reducing neighbourliness, quality of design or liveability. Zoning needs to be conditional in order to implement quality design with a contextual fit.

These changes also fail to make it easier to convert existing buildings to allow more rentals, such as two secondary suites as an incentive for retention, an incentive that CVN would support.

And finally, we question the wisdom of changing the only rental-only (non-stratified) zoning in the city, the RS zones, into outright strata duplexes at a time when the city is considering the new tool of rental-only zoning to expand rental housing. These policies are at cross-purposes.

For these and many reasons, CVN does not think these proposed amendments are ready for approval and request that they be referred back to staff for more work and involvement of the neighbourhoods and stakeholders affected.

## Sincerely,

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On behalf of the Coalition of Vancouver Neighbourhoods

## Member Groups of the Coalition of Vancouver Neighbourhoods

Arbutus Ridge Community Association
Arbutus Ridge/ Kerrisdale/ Shaughnessy Visions
Cedar Cottage Area Neighbours
Downtown Eastside Neighbourhood Council
Dunbar Residents Association
Fairview/South Granville Action Committee
False Creek Residents Association
Grandview Woodland Area Council
Greater Yaletown Community Association
Joyce Area Residents
Kitsilano-Arbutus Residents Association
Kits Point Residents Association
Marpole Residents Coalition

Norquay Residents
NW Point Grey Home Owners Association
Oakridge Langara Area Residents
Residents Association Mount Pleasant
Riley Park/South Cambie Visions
Shaughnessy Heights Property Owners
Association
Strathcona Residents Association
Upper Kitsilano Residents Association
West End Neighbours Society
West Kitsilano Residents Association
West Point Grey Residents Association