July 5, 2022

City of Vancouver Council

Dear Mayor Kennedy Stewart and Councillors,

Re: Vancouver Plan Proposed Approval (Committee of Council July 6, 2022)

Council Agenda: https://council.vancouver.ca/20220706/cfsc20220706ag.htm Council Report: https://council.vancouver.ca/20220706/documents/cfsc1.pdf

The Coalition of Vancouver Neighbourhoods (CVN) is **opposed** to this Vancouver Plan as proposed.

Please **refer this report back to staff** for local neighbourhood planning that considers livability in a local character context, environmental impacts, measures to avoid displacement impacts on existing more affordable housing, and other affordable housing options, including ground-oriented housing for families, coops, and other models for both renters and owners. A plan of this magnitude, **especially as it may become the Official Community Plan (OCP) and that potential provincial changes could allow rezonings without public hearings**, should not be approved within only a week of the final report being made public. There are many concerns with the 230-page report. A small selection of many points of concern are as follows:

1. No Neighbourhood-based Planning - One Size Fits All

Policies are too broad-brushed and rely on a one-size-fits-all approach. The plan draws lines on the map of Vancouver in swaths of mauve and purple showing large areas of the city scheduled for redevelopment — yet each neighbourhood is unique. Areas where added density can work may be in smaller pockets in particular parts of a neighbourhood. The draft plan places too much emphasis on increasing the number of housing units, and not enough on different types of housing. Neighbourhood-based planning from the ground up would have procured opportunities for densification that respect existing neighbourhoods and fit into the local context. The draft plan, if approved, will result in repealing all existing neighbourhood Community Plans and Community Visions, which were based on years of neighbourhood involvement and extensive participation done in good faith.

2. Lack of Urban Design

The plan does not prioritize good urban design. Some of the suggestions, like six storeys in shopping districts purportedly to preserve sunlight access but 12 storeys along residential streets, minimize the impact of high buildings on sunlight and livability. Former senior planners with the City are expressing their concerns over poor urban design. Ralph Segal says, "...approval of the Vancouver Plan and its approach to planning and affordable housing, will nail it as a disaster." (https://www.theglobeandmail.com/real-estate/vancouver/article-generation-density-past-planners-speak-out-on-urban-development/)

3. Excessive Population Targets

The population targets chosen are too high and the plan does not give enough recognition to possible changes in economic conditions over the next thirty years. Consultants have produced several different possible scenarios for future population in 2050, ranging from an increase of 173,000 people to a high target of 286,000. The Metro Vancouver Regional Growth strategy calls for 164,500 in Vancouver. However, the Vancouver Plan calls for an increase of 262,000 people, almost the highest option, and far beyond the historical average increase of 1% per year. Such a high target puts more and more pressure on neighbourhoods and infrastructure to absorb more and more housing.

4. Lack of Consideration of Existing Capacity

The plan includes very little recognition of existing capacity in existing zoning, and of the potential population increase in large sites and projects already being planned, such as Jericho Lands, Heather Lands, , Seńákw, Rupert station, or Cambie Corridor. Other examples of important factors not adequately considered are the recent changes approved by City Council to allow six storey mixed use rentals along local shopping streets, the Streamlining Rental program (allows 4 and 6 storey apartments on arterials and local streets throughout much of the City), the large potential for laneway rental houses and the change to allow new duplexes in RS zones.

5. Too many Rental Towers (mainly for REITs) and too little Ground-Oriented Family Housing

The plan does not give enough consideration of different types of housing, including ownership, co-op, and rental, that will be needed over the next 30 years for families, as well as single people and couples. As the years pass, more and more single people who currently seek apartment rentals will be forming families and wanting housing that is ground-oriented and large enough for a family with one or two children to live in over the long term. Many will want the chance to buy a home or a co-op unit where they can feel securely housed.

Over and over in the plan, planners prioritize rental and social housing, with an excessive emphasis on the tower form. The small number of areas left in the city proposed for multiplexes do not currently have towers (such as the RT character areas of Kitsilano, Grandview-Woodlands and Mount Pleasant). Even in the multiplex areas, planners also leave open the option for low-rise apartments, thereby undermining the potential for multiplexes to be built.

6. No Policy for Heritage Buildings and Character Retention Incentives Undermined

The plan makes no clear statement or indication that buildings on the Heritage Register (whether or not legally designated as heritage) will be protected from demolition and redevelopment. The plan offers very little recognition or emphasis on the city's heritage buildings, and no strategy as to how they can be retained. The plan mentions making the Heritage Register more equitable but offers no description of what that might entail.

By adding so much new larger development it undermines current character house retention incentives, increases in embodied carbon, and loss of neighbourhood character and streetscapes. There is still no option to add two secondary suites as an incentive for character house retention.

7. Not Enough Provision of Green Space (Private and Public)

There is not enough consideration given to the serious impacts of redevelopment proposed by the plan on green space and tree canopy, with implications for carbon capture, rain run-off and the urban heat island.

8. Embodied Emissions

The plan does not adequately consider carbon footprints and embodied emissions associated with new development, especially the use of concrete and glass in new tower buildings. It offers no consideration of policies to actually mitigate embodied emissions. https://vancouversun.com/opinion/columnists/douglas-todd-the-hidden-climate-costs-of-b-c-s-burgeoning-highrises-part-ii

9. City Services

The plan contains no significant consideration of how the City will provide the amenities, green space, and services such as schools, that will be needed if the population expands to meet targets stated in the plan. There appears to be no acknowledgement that the need for green space and community centres will increase even more due to high density tower development.

10. Lack of Social License

There were no advertisements, articles, or notices in newspapers or other mainstream media that the plan is coming to Council on July 6. City Council must realize that during this time, many people are away from home/town/work, and families are busy with children on summer break. Also, with only three months remaining in its mandate up to the October 2022 election, Council cannot justify the adoption of such an important city plan. Considering all the concerns raised above about the proposed plan, such an important decision should be done by the next council, which will be responsible for implementation.

The Ipsos Read Survey referred to in the report is the only randomized survey that has been conducted with under 200 people. Only 15% of the respondents said that they strongly support the Land Use Strategy. Everyone else had some or many concerns.

All the surveys that were conducted in relation to the Vancouver Plan followed the same approach. Planners gave a biased view of the benefits, and respondents were given a rosy view of the future under the Plan, before being asked to state how they felt. What would the outcome be if survey participants had been provided a more meaningful and balanced description of the Vancouver Plan, told that amenities and services might not be available, that demolition and land assembly would have to occur with plan implementation, that the idea of 'complete neighbourhoods' would mean apartment buildings of up to 12 storeys on many blocks throughout the city?

Above are just some of the many concerns about the Vancouver Plan.

Please do not approve this plan. Instead, please refer it back to staff for meaningful local neighbourhood planning. Include specific instructions on how to provide for population growth, and strive for: livability in the context of local character; address environmental impacts; include measures to avoid displacement from existing relatively affordable housing; and give adequate consideration to more affordable housing options, including ground-oriented housing for families, co-ops, and other models for both renters and owners, with amenities and adequate infrastructure in each neighbourhood.

Sincerely,

Steering Committee, 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
Dunbar Residents Association
Fairview/South Granville Action Committee
False Creek Residents Association
Grandview Woodland Area Council
Granville-Burrard Residents & Business Assoc.
Greater Yaletown Community Association
Kitsilano-Arbutus Residents Association
Kits Point Residents Association

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