



COALITION OF VANCOUVER NEIGHBOURHOODS

<http://coalitionvan.org>

December 5, 2022

City of Vancouver Council

Dear Mayor Ken Sim and Councillors,

Re: Clr. Boyle Motion B.2 - Reducing Barriers and Deepening Affordability for Non-Profit, Co-op and Social Housing in Every Neighbourhood

Council Agenda: <https://council.vancouver.ca/20221206/regu20221206ag.htm>

Council Report: <https://council.vancouver.ca/20221206/documents/b2.pdf>

While the Coalition of Vancouver Neighbourhoods (CVN) supports in principle non-profit, co-op and social housing in every neighbourhood, CVN is **opposed** to this motion for the same reasons we were opposed to Councillor Boyle's similar motion in May 2021.

The proposal for 12 storey towers without public hearings in the RM3 and RM4 zones would put extreme pressure on the existing 3 or 4 storeys rental buildings in those zones, and trigger the loss of the most affordable existing rentals in the city.

Every neighbourhood can and should be planned within the local context with a meaningful public consultation process. Many neighbourhoods already have Community Plans. Non-profit, co-op and social housing should be incorporated within the scale and context of each neighbourhood's plan, and such housing should be spread equitably across the city.

Large arbitrary spot rezonings of up to 12 storeys would set precedents that inflate land values and put development pressure on the surrounding area. This undermines net affordability if the older more affordable housing is inflated, so keeping development within the local context is important.

Also, it is undemocratic and against the intent of the Vancouver Charter to allow spot rezonings without public hearings. The city needs to move away from so many spot rezonings. Historically, spot rezonings were used only in special circumstances, not, as recently done, as a means of planning the city as a whole.

Additionally, City Council and the public continue to lack the much-needed data to determine what unit numbers are actually needed for our communities, we need clarification on the definition of 'social housing', and this motion will result in the loss of existing affordable housing, especially in targeted RS, RT, and RM zones.

Please do not approve this motion and instead work with the neighbourhoods to reconsider the Vancouver Plan by working through neighbourhood-based planning that involves the community in determining how growth and affordable housing can be accommodated in every neighbourhood within the local context, with the required amenities and services.

Further, we here enclose the concerns raised in our CVN letter to Council from May 2021 to address Councillor Boyle's similar motion.

<https://coalitionvan.org/posts/2021-may18-increases-12-storeys-city-wide/>

A summary of the main reasons for opposing this motion are:

- The scale of the proposed buildings are too big at 400% of the outright height and FSR with major negative impacts on existing rentals, land inflation, demoviction and displacement;
- Staff need to provide the data as directed by Council motion in May 2020 to inform the planning for how much social housing is actually needed;
- The city's definition of "social housing" currently allows 70% of the units at market rent but counts it as 100% social housing when it is mostly market rents. This needs reconsideration and clarification in the near future, as previously considered at Council (see Councillor Fry's earlier Motion)
- It is undemocratic to allow major increases in height and density without public hearing and undermines community plans.

Social housing with appropriate locations, supports and amenities could be provided in every neighbourhood if the scale, form and context of each neighbourhood were properly considered. This motion doesn't do this as the proposed scale and form would have major negative consequences for the affected communities without requiring project rezoning public hearings.

Some of the many concerns are as follows:

- The huge increase in scale of up to 400% of that allowed by current outright zoning would increase land lift for the subject property and all of the area around the site. RM-3A and RM4 would go from 3-4 storeys at 1.45 FSR to 12-13 storeys (including exempted top floor amenities) with 6 FSR.
- Staff suggested that with the six storey height limit, the new social housing was only feasible if the land were acquired at no cost, i.e., already a social housing site. So the new social housing would be at the expense of existing social housing but the number of sites was limited in number. With the increase to 12 storeys, it may well be that redevelopment would be possible with land purchase. This would put many more existing affordable rental units at risk of demolition.
- Going from wood frame construction to concrete would increase costs, rents, embodied GHG emissions and demolition waste in the landfill.
- Regardless of tenure, the physical scale and form would be used as a precedent for future spot rezonings, including market rentals and strata.
- This will increase development pressure, increase rental inflation, gentrification, demovictions, and displacements for existing older more affordable rental buildings. Existing rents in older buildings tend to be much lower than new rentals, sometimes even lower than typical subsidized social housing rents, while existing older units are also generally larger. Most of the city's existing affordable rental apartment buildings are in RM zones.
- The City defines social housing projects as only requiring 30% of the units subsidized below HILs rates and the other 70% of the units could be market rentals, while 100% of the units are counted as social housing. This motion fails to clarify this important point. While it is true that further subsidies may be granted from other levels of government, there is no guarantee or requirement for this as part of the approval process and is subject to qualification and availability of future programs.
- This motion doesn't even require a greater level of affordability. All increases in height and density should meet the affordability requirements from BC Housing (20% deep subsidy, 50% moderate subsidy, 30% some subsidy) rather than the Vancouver Zoning and Development By-law.
- Large increases to height and density in RS, RT, and C zones citywide would have the same effects of inflating land values, increased rents and displacement as described above. Possibly even more so.

- Secondary suites are an important part of the existing affordable rental stock. Large increases in building scales for new social housing, of which 70% of the units could be market rents, will lead to displacement, gentrification and demolition of character buildings.
- Large increases to height, FSR and form without a rezoning public hearing is undemocratic and undermines security that zoning is intended to provide.
- It also undermines neighbourhood character and liveability by allowing much bigger buildings that block views, overshadow yards and buildings for gardens and potential solar panels.
- This motion undermines neighbourhood based planning and pre-empts the outcomes of the Vancouver Plan and the Broadway Plan. Although these plans have been approved in principle, many of the planning details are yet to be determined. Any allowance for buildings of this size, with its effects on a neighbourhood, should be considered through a neighbourhood-based public consultation process. Given that the Vancouver Plan is already looking at planning options, including for social housing, it would seem that this motion is out of order.
- This motion is in conflict with existing Community Plans, including the most recent in Grandview Woodland.

Please **do not approve** this proposed motion.

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