



COALITION OF VANCOUVER NEIGHBOURHOODS

<http://coalitionvan.org>

March 3, 2023

City of Vancouver
Dear Mayor Ken Sim, Councillors and City staff,

Re: RS Rezoning and Multiplex Consultation

The Coalition of Vancouver Neighbourhoods (CVN) supports increasing missing middle housing in principle in every neighbourhood. However, CVN has major concerns about the current approach both in substance and process. **We request that you take steps to ensure the public has a more meaningful role in further phases of planning for draft bylaw changes before a refined draft proposal is established, not after.** Previous public consultation has been at the conceptual level, not on the kind of technical details needed for evaluation. The current proposal also lacks needed information for meaningful discussion.

Change of approach needed: Last fall's civic election sent a clear message that the public wants a change in direction from how things were done by the previous council. However, this proposal for multiplexes in RS zones citywide is the same as the motion brought forward by former mayor Kennedy Stewart last year for multiplexes up to 6 units on a lot which he used as a central part of his re-election campaign. The public clearly voted **against** this approach not for it. While changes to RS zones could be made to simplify zoning and include multiplexes, the City should not be following Kennedy Stewart's plan.

Lack of public consultation: Staff have been consulting with limited members of the development industry on this for over a year, but only now consulting with the public for only one month before intending to finalize the options. The public has not received enough meaningful details, information or opportunities for meaningful input into the proposals. Just one example is the map on presentation board #11 showing lots for 4 or 6 units has changed from the Council presentation without explaining the criteria, with 6 units covering many more lots than previously proposed to Council. The public survey provided is entirely flawed and cannot be reliably viewed as feedback. Most people refuse to fill it out since it is so biased.

The public should have more meaningful involvement in the next phase of work for creating further draft proposals. Attached is an Appendix with just some of the many comments, concerns and questions that have been raised by our network that have yet to be addressed.

Sincerely,
Steering Committee, Coalition of Vancouver Neighbourhoods

Network Groups of the Coalition of Vancouver Neighbourhoods

Arbutus Ridge Community Association	NW Point Grey Home Owners Association
Arbutus Ridge/ Kerrisdale/ Shaughnessy	Oakridge Langara Area Residents
Visions	Residents Association Mount Pleasant
Cedar Cottage Area Neighbours	Riley Park/South Cambie Visions
Dunbar Residents Association	Shaughnessy Heights Property Owners Assoc.
Fairview/South Granville Action Committee	Strathcona Residents Association
False Creek Residents Association	Upper Kitsilano Residents Association
Grandview Woodland Area Council	West End Neighbours Society
Greater Yaletown Community Association	West Kitsilano Residents Association
Kitsilano-Arbutus Residents Association	West Point Grey Residents Association
Kits Point Residents Association	West Southland Residents Association
Marpole Residents Coalition	

APPENDIX - RS Rezoning and Multiplex Consultation (March 3, 2023)

Below are just some of the many comments, concerns and questions we have about the proposals:

Lack of planning and resources for amenities and infrastructure for growth: Of particular concern is the lack of neighbourhood-based planning for adequate amenities and infrastructure for approved growth. The accumulative affects of multiplexes will be substantial, so therefore it is critical that planning includes the resources for schools, health care, daycare, community facilities, amenities and infrastructure in every neighbourhood. As we know CACs and DCLs do not begin to cover these costs for growth and there is no reason to believe that new additional proposed CACs will be any different. Many neighbourhoods are already underserved for amenities and infrastructure.

Basic electrical and sewer infrastructure insufficient: Requiring every RS lot to have its own electrical transformer (PMT) with a 12 ft x 12 ft easement at the lane and a huge underground water holding tank to prevent overflowing the sewer system illustrates how the current proposal is beyond the capacity of city infrastructure. These costs of approximately **\$100,000 for a transformer PMT and \$25,000 for a water tank are prohibitive**, as well as taking up valuable land area that makes this unfeasible.

Loss of existing affordable rental suites: The RS zones currently have a very large number of rental suites, as well as whole houses that are rented, that would be lost through this initiative.

Why rezone 60,000 RS lots for up to 6 units each when the target is only 10,000 more units?: Rather than completely overloading the city's infrastructure, the city should take a more targeted approach. Look at how each neighbourhood can take their fair share of the 10,000 unit target and ensure that it is done in parallel with the required infrastructure. **Note that the 10,000 unit target is for all missing middle units, not just multiplexes**, including duplexes, suites, infill and character house retention incentive projects.

A more selective approach could produce more units while putting less pressure on services: At an average of only one added unit per lot **that could produce 60,000 units**. For example, by making multiplexes a bit more moderate, it could actually be easier to build while not undermining the other opportunities such as for more suites, character house retention incentives, or overloading services. For example, allowing multiplexes at 0.85 FSR of 3 units on standard 33'x120' lots, 4 units on 50'x120' lots and 6 units on corners with 60' or more width would provide for bigger family units, more yard, trees and permeability, and a better fit for services.

Undermining character retention incentives - 0.85 FSR vs 1.0 FSR: The current character house retention incentives of 0.85 FSR would be undermined by allowing 1.0 FSR for multiplexes. This will lead to more demolition and lost rental affordability. The retention incentives need to be more than new construction or they will not work. This is unbalanced as proposed.

Undermining climate policy objectives for more trees and less embodied carbon: To meet climate objectives, the need for growth should be balanced with climate objectives to increase the tree canopy. Current proposals of 1.0 FSR will leave little yard space for retaining existing trees or planting new. The higher the new FSR and larger site coverage, the more embodied carbon is produced to build a bigger building and more demolition.

Minimum unit sizes and bedroom sizes should be specified: Multiplexes in Norquay have shown that typically bedrooms are only 7'x8' and units too small for families so minimum sizes are required.

Properties listed on the Vancouver Heritage Register should be exempted: To be consistent with Heritage retention policies, increasing development pressure from multiplexes should be avoided. Instead, properties listed on the Heritage register can increase development through retention incentives in a Heritage Retention Agreement (HRA).

Lack of data for planning: City Council and the public continue to lack the much-needed data to determine how many units are actually required for anticipated growth in our communities. Also needed is data on how many units have already been planned or approved broken down by neighbourhood and how much impact that will have on services. This data should also inform how multiplexes are implemented.

Reduced front yard setbacks: Almost no front yards or permeable surfaces are proposed with little green space provided. Loss of trees, even large street trees where front yard setbacks are so narrow that it isn't enough room for root systems. Instead, front yards should be retained to provide for outside space for the ground floor or front unit, to avoid putting all the outdoor space in the rear yard with little privacy between units. Front yards should continue to be a factor of the depth of the lot, as well as consideration of adjacent properties and streetscapes. Where front yards are reduced, consider stepping back the second floor to avoid cutting off all light to adjacent properties. It is unclear in the presentation materials what the proposed front yard setback would be.

Combining RS Zones: While there may be some rationale for simplifying and combining some RS zones, some zones such as RS3 and RS3A were specifically designed for the existing lot sizes, configurations and building forms of the area. These should be treated differently and retained. There should be some consideration of local area conditions and influences.

Design Guidelines should be retained and improved: The Design Guidelines help to clarify the intent of the zoning and provide important guidance to designers, builders and staff. Having this level of clarity actually helps to speed up approvals rather than leaving it open to misinterpretation that requires many revisions. To remove Design Guidelines is not practical and makes the zoning less transparent.

Lack of onsite parking and EV charging: Only requiring one or two onsite parking stall for up to 6 units, or potentially no onsite parking, will overload street parking and not have electric car charging that is a disincentive to convert to an EV.

Require all new single family houses to have a secondary suite: There is no reason to be building new houses without at least one secondary suite.

Allow additions and renovations to existing houses beyond 0.6 FSR: The proposed reduced sizes of new houses to 0.6 FSR with increased laneway house is reasonable. While avoiding very big new houses is a good idea, there should be some options for making additions or renovations to existing houses for adaptive reuse.

Allow 2 secondary suites through the Secondary Suite Program: Traditionally, it is common to find houses made up of 3 suites, ground level, main floor and top floor suites. Usually at least one of these suites are unauthorized. Rather than shutting down good suites, they could be legalized and made safe through the Secondary Suite Program. Code staff are reluctant to do so, but now even the province is incentivizing more secondary suites so this should be reconsidered through direction by Council.

Landscape irrigation should be required to ensure trees and shrubs survive: There is very little landscaping so to ensure it survives it is essential that there is irrigation, especially with multiple strata owners.