



COALITION OF VANCOUVER NEIGHBOURHOODS

<http://coalitionvan.org>

May 26, 2024

City of Vancouver

Dear Mayor Ken Sim and Councillors,

Re: Referral to Public Hearing Reports - Rezoning to Comply with BC Bill 44

Agenda 2024-05-28: <https://council.vancouver.ca/20240528/regu20240528ag.htm>

Referral Report 1: Amendments to Restricted Zones (RT-7, RT-9, CD-1 371 and CD-1 463) to Comply with Bill 44 - Provincial Small-Scale Multi-Unit Housing (SSMUH) Legislation

<https://council.vancouver.ca/20240528/documents/rr1.pdf>

Referral Report 2: Amendments to the First Shaughnessy District Schedule and Heritage Conservation Area Official Development Plan (HCA ODP) to Comply with Bill 44 - Provincial Small-Scale Multi-Unit Housing (SSMUH) Legislation

<https://council.vancouver.ca/20240528/documents/rr2.pdf>

The Coalition of Vancouver Neighbourhoods (CVN) strongly **opposes referring these two reports to public hearing since they are proposing to rezone entire neighbourhoods without ANY advanced public consultation process.**

Report 1 rezones **Kitsilano (RT7 & RT9)** and Report 2 rezones **all of the First Shaughnessy Heritage District**, without opportunity for meaningful input from the public, the FS Advisory Design Panel, or the Heritage Commission. These proposed rezonings **remove all character and heritage disincentives for demolition, without adequate incentives for retention options or guidelines.**

Hours before these reports were posted online, 2024-05-22, CVN sent Council a letter advising that we have many concerns regarding the new provincial legislation, Bills 44, 46 and 47. We find the current June 30, 2024 schedule for local and city-wide rezoning to be completely unrealistic, as it will neither allow for any legitimate public process nor a proper infrastructure review. We requested an extension to at least the end of 2024 or preferably spring 2025.

See our previous letter attached and posted online at:

<https://coalitionvan.org/posts/20240522-response-provincial-legislation-bills-44-46-47/>

<https://cityhallwatch.wordpress.com/2024/05/23/citywide-opposition-bills-44-46-47-june30-deadline/>

The two Referral Reports 1 & 2 above, coming forward without any public consultation process, only proves our point that the **current schedule for rezoning of June 30 is completely unrealistic for any kind of legitimate planning process.**

As we pointed out in our previous letter, the City confirmed that Vancouver already exceeds the provincial five year targets based on the record number of developments currently in the pipeline. However, current market conditions have put many new already approved projects on hold, so there is **no imminent pressure to rush further rezoning without a proper public consultation process.**

The City of Vancouver is also likely already exceeding infrastructure capacity. It is crucial that an infrastructure review be undertaken as part of any further planning for more rezoning.

Therefore, we request that **the proposed Referral Reports 1 & 2 be instead referred back to staff for a proper planning process with public consultation, with direction to staff to advise the Province that the current schedule of June 30, 2024 for local and city-wide rezoning is unrealistic for Vancouver, so should be extended to at least the end of 2024, or preferably spring 2025, in order to have a legitimate public process and an infrastructure review.**

Sincerely,

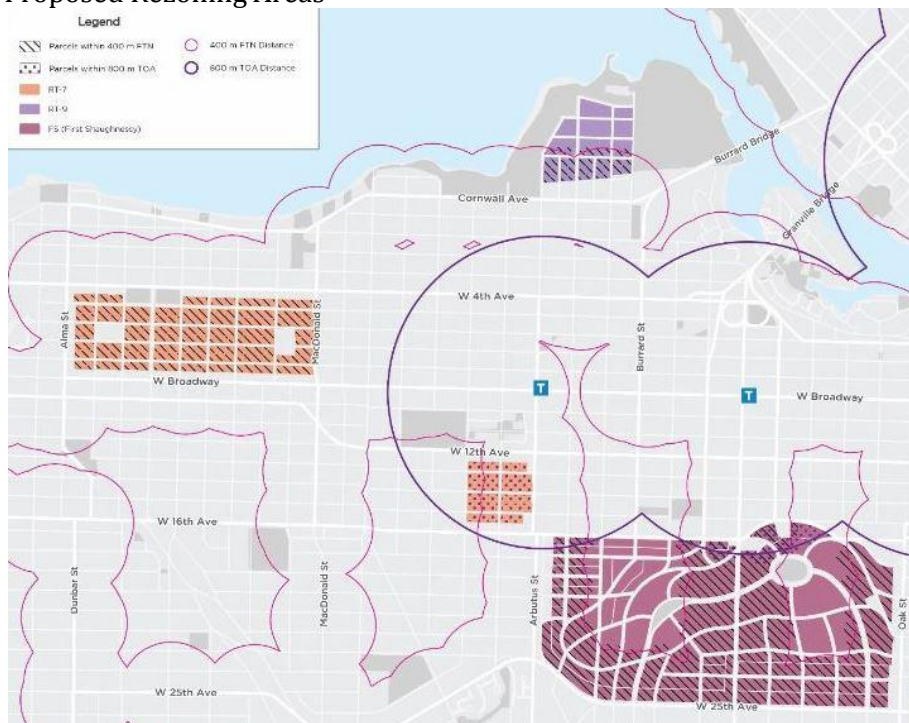
Co-Chairs Larry Benge & Dorothy Barkley
CVN Steering Committee,
Coalition of Vancouver Neighbourhoods

Network Groups of the Coalition of Vancouver Neighbourhoods

Arbutus Ridge Community Association
Cedar Cottage Area Neighbours
Dunbar Residents Association
Fairview/South Granville Action Committee
Grandview Woodland Area Council
Greater Yaletown Community Association
Kitsilano-Arbutus Residents Association
Kits Point Residents Association
NW Point Grey Home Owners Association
Oakridge Langara Area Residents

Residents Association Mount Pleasant
Riley Park/South Cambie Advisory Group
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

Proposed Rezoning Areas



Attached for reference: Coalition of Vancouver Neighbourhoods Letter dated 2024-05-21



COALITION OF VANCOUVER NEIGHBOURHOODS

<http://coalitionvan.org>

May 21, 2024

City of Vancouver

Dear Mayor Ken Sim and Councillors,

Re: Response to New Provincial Legislation: Bills 44, 46 and 47

Agenda 2024-04-23: <https://council.vancouver.ca/20240423/regu20240423ag.htm>

Report: <https://council.vancouver.ca/20240423/documents/r1.pdf>

Minutes: <https://council.vancouver.ca/20240423/documents/regu20230423min.pdf>

Staff Presentation: <https://council.vancouver.ca/20240423/documents/r1-staffpresentation.pdf>

The Coalition of Vancouver Neighbourhoods (CVN) has many concerns regarding the new provincial legislation, Bills 44, 46 and 47. **We find the current June 30, 2024 schedule for local and city-wide rezoning to be completely unrealistic, as it will neither allow for any legitimate public process nor a proper infrastructure review. We request an extension to at least the end of 2024 or preferably spring 2025.**

This rezoning includes a large area of Kitsilano in RT7 and RT9 zones; rezoning the entire First Shaughnessy Heritage ODP; designation of Transit Oriented Areas city-wide with rezoning policies; and changes to the Parking Bylaw to eliminate minimum onsite parking requirements.

There was no public consultation or meaningful opportunity to review the staff report, with only three working days to review it online. No staff presentation materials were made available in advance, and there was no opportunity to speak at the Council meeting.

Further, **we strongly object to the City endorsing the provincial changes to the Vancouver Charter and rezoning mandates**, without public consultation from a local perspective. These bills were **rushed through provincial legislation, without any debate on the Vancouver Charter portion of the bills prior to closing debate and forcing a vote.** UBCM has confirmed that municipalities were forced to sign non-disclosure agreements to discuss the proposed bills with the province in advance of approval, with no public consultation process.

A Freedom of Information request revealed that **development industry promoters and lobby groups were the sole advisors involved in the so-called "experts" panel that the Province consulted on the housing bills**, based on a very flawed report the panel produced with questionable assumptions. There was no public consultation or extensive planning analysis that would justify such sweeping actions to **transfer land use planning authority from municipalities to the Province for this one-size-fits-all rezoning across the entire province.**

Land use planning authority should be under the control of municipal local and regional governments, not the Province. There is no legitimate justification for these bills.

We are also concerned that the City of Vancouver **is exceeding infrastructure capacity, and we strongly recommend that an infrastructure review be part of further planning for rezoning.**

A subsequent Council report dated May 14, 2024, **Provincial Housing Targets Order – 6 Month Interim Report: October 1, 2023 – March 31, 2024**, confirms the City of Vancouver will meet the five year targets, but needs further Provincial funding to provide affordable and supportive units.
<https://council.vancouver.ca/20240514spec/documents/spec1.pdf>

This report confirms that:

*"Despite lower than anticipated completions, there is an unprecedented volume of projects in-stream, **with enough capacity in our current development pipeline to meet the Province's overall completions target over the 5-year time frame.**"*

And further that:

*"There are currently ~31,300 units of housing at different stages of application, **exceeding the 5-Year Provincial Target of 28,900.**"*

This May 14 City Council report also confirms that the lower number of current completions over the last six months is due to market conditions beyond the control of the City of Vancouver. Although the City has approved development at a record pace over the last few years,

*..."**the timing for construction and completion of housing units is primarily dependent on factors beyond the City's control**, including capacity of the construction sector, inflationary pressure, access to funding, and financing for market and non-market developers."*

The Council report confirms that **99% of units were at market rents** in housing completions over this six month period, **with only 1% (11 units) affordable at or below HILS rents, and 0% were supportive units.** To achieve the required **affordable HILS and supportive units, it needs more Provincial subsidies** that are beyond the capacity of the City to provide.

There are likely more affordable rental units demolished than new affordable units built.

The City already exceeds the provincial five year targets based on the record amount of developments currently in the pipeline. However, current market conditions have put many new already approved projects on hold, so there is no imminent pressure to rush further rezoning without a proper public consultation process.

The City of Vancouver is likely already exceeding infrastructure capacity. It is crucial that an infrastructure review be undertaken as part of any further planning for more rezoning.

Therefore, we request that the current unrealistic schedule of June 30, 2024 for local and city-wide rezoning be extended to at least the end of 2024, or preferably spring 2025, in order to have a legitimate public process and an infrastructure review.

Sincerely,

Co-Chairs Larry Benge & Dorothy Barkley
CVN Steering Committee,
Coalition of Vancouver Neighbourhoods

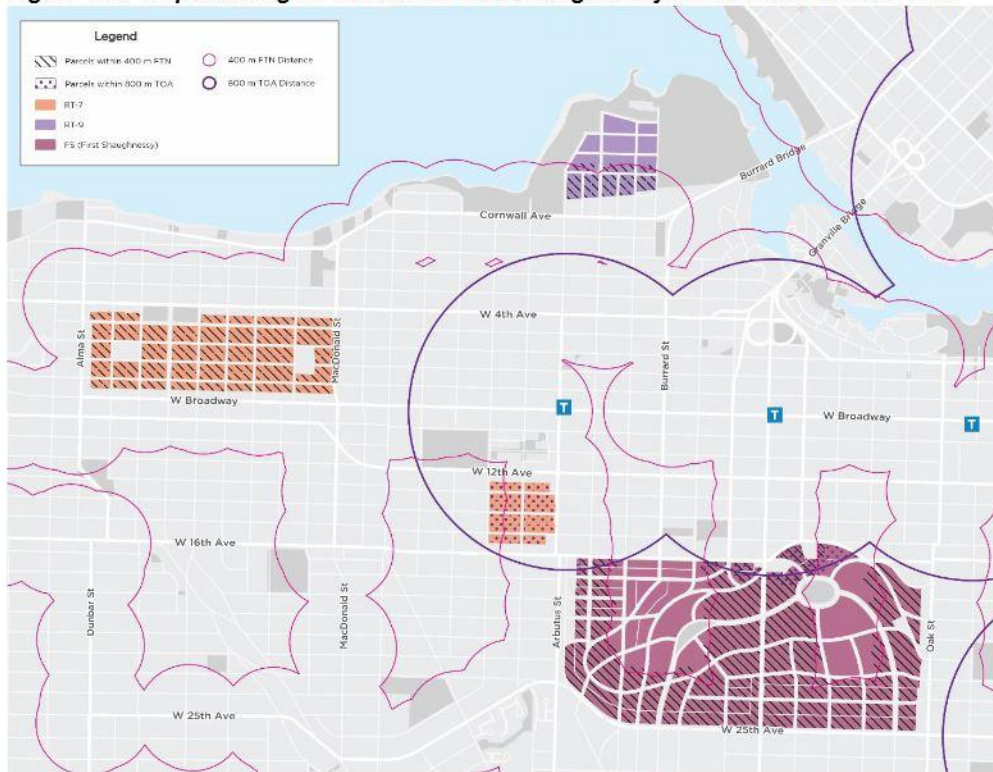
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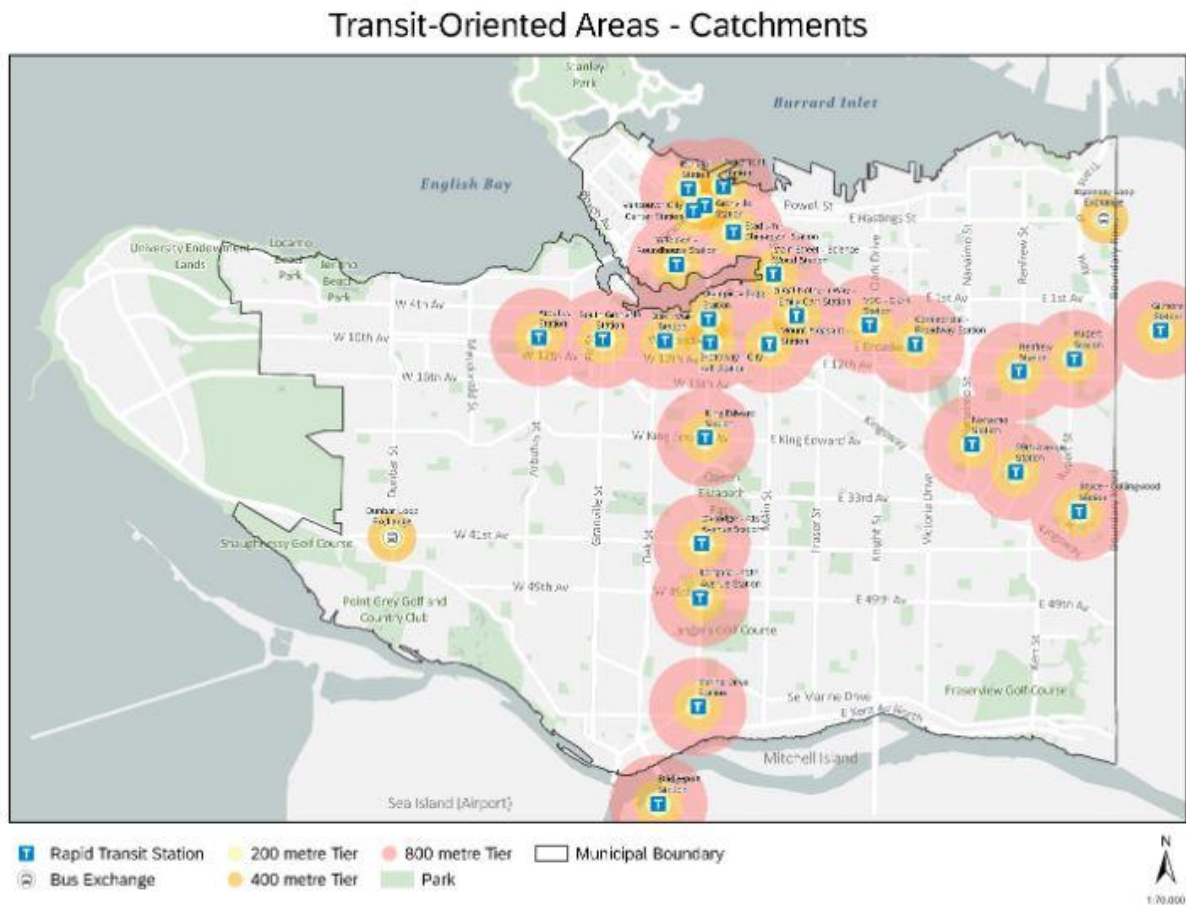
Attachments below are graphics from the Council Report dated 2024-04-23
<https://council.vancouver.ca/20240423/documents/r1.pdf>

Figure “4”: Map showing RT zones and First Shaughnessy District with TOAs & FTN



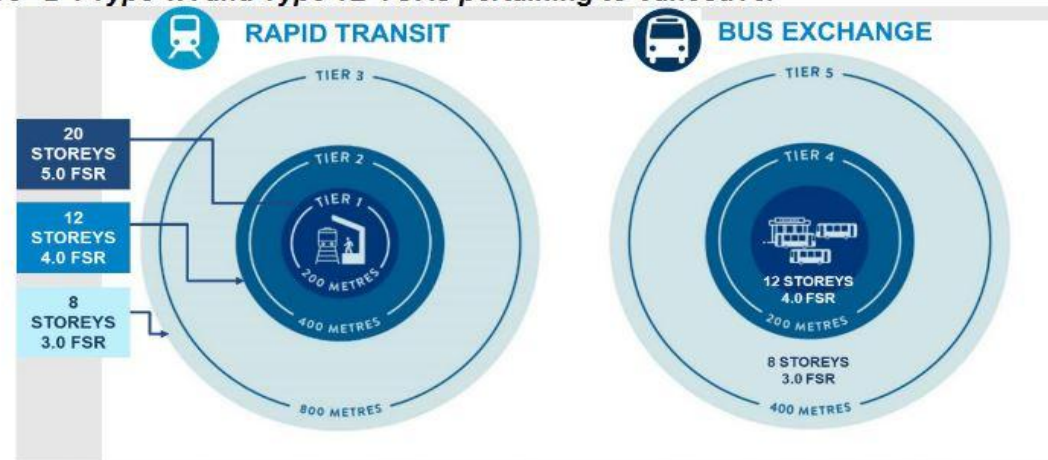
Staff will be reporting back to Council in June 2024 with recommendations and proposed amendments to the “restricted zones” in Vancouver to conform to the requirements for SSMUH. Staff are currently evaluating options for these changes, including the application of density bonusing, and development conditions such as maximum floor space ratios (FSR), height, and adequate servicing capacity to accommodate the anticipated growth.

Figure “1”: 29 Transit-Oriented Areas prescribed by regulation



There are two types of provincially designated TOAs pertaining to the City of Vancouver, summarized in the following figure:

Figure “2”: Type 1A and Type 1B TOAs pertaining to Vancouver



This legislation only applies to residential or mixed residential land use. Parcels zoned for commercial, agricultural (Agricultural Land Reserve) and industrial land uses are exempt. Federally and provincially regulated properties, such as the Vancouver International Airport, and First Nations reserve lands are also exempt.