



COALITION OF VANCOUVER NEIGHBOURHOODS

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October 29, 2025

Via Email: josh.white@vancouver.ca, odp@vancouver.ca, Mayor and Council

City of Vancouver

Attention: Josh White, General Manager, Planning, Urban Design, and Sustainability

Dear Mr. White,

Re: City of Vancouver Draft Official Development Plan (ODP)

On behalf of the Coalition of Vancouver Neighbourhoods (CVN), we have the following comments on the Draft Official Development Plan (ODP). While we recognize the need for citywide planning, we are greatly concerned about both the process this draft has undertaken and the proposed draft content.

Process: First, we would like to address the process. This draft ODP is 204 pages, with many other related documents and displays, but the public is only given about two weeks to review and ask questions. Only four open houses for the whole city over this two weeks.

The City did not send out mailed notices or posters to ensure that people knew about it. Most people would have no idea what this ODP is or how to interpret all of the documents.

The documents for public review are very long, but are misleading and incomplete.

For example, On page 86 of the ODP, there is a reference to Map B7 in Appendix B.

"Non-profit and government organizations may be permitted to build social housing buildings from 6 to 20 storeys in most residential areas, depending on neighbourhood type (see Map B7: Social Housing Initiatives in Appendix B). Compatible nonresidential uses are permitted throughout residential neighbourhoods to support complete neighbourhoods."

There is no map or any appendices on the draft plan <https://syc.vancouver.ca/projects/odp/draft-vancouver-odp-eng-full.pdf> However, in small print on the table of contents, it says these are not in the draft plan but will only be included in the final plan. This is a major omission. People need to see the Map B7 **now** to see what height of social housing would be allowed in their neighbourhood.

Also, the Vancouver Plan map has now been relabelled as Urban Structure Strategy. This is misleading since it is in fact the transit oriented development urban growth for the future and is buried in the document as if it is inconsequential.

Most people who look at this document, if they see it at all, they will have no idea what it all means to them or the future of the city. In fact, our groups and members are still struggling to understand it all.

This is not a legitimate process for public input.

The ODP has not addressed the issues in the Vancouver Plan: The ODP is relying mostly on the Vancouver Plan that has not addressed any of the concerns raised previously. The Vancouver Plan was also a flawed process. The main stakeholders who have been consulted are industry and development related groups, without involving the public in any meaningful way.

The following are our previous concerns raised in July 2022 when the Vancouver Plan, which we opposed, was rushed through for Council approval with only a few days notice. We do not see that any of the concerns we raised at the time have been addressed and we only see it as actually worse.

We continue to ask for staff to include 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, co-ops, and other models for both renters and owners. A plan of this magnitude, **especially as it is now the draft Official Community Plan (OCP), and that it will allow rezonings without public hearings, should not just implement the flawed Vancouver Plan.**

Here is a small selection of our many previous concerns that now apply to the ODP 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, , Seánákw, 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, now increased to multiplexes in R1-1.

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 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 Vancouver Plan came to Council on July 6, 2022, in the middle of the summer when people are on holidays right before the election in October 2022. Then it was a landslide election, wiping out almost all of previous council, clearly signalling a desire for change. Unfortunately, the public did not get that change. Instead the ODP is now just a repeat of the same plan but worse, and again only two weeks to respond to the huge draft ODP without any public notices mailed or meaningful opportunities for public input or consultation.

At the time of the Vancouver Plan, the Ipsos Reid 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. Throughout the Vancouver Plan process the level of public support was misrepresented. The ODP process relies almost exclusively on this prior Vancouver Plan process.

Please do not continue implementing this flawed plan. Instead, reflect meaningful local neighbourhood based planning in the ODP. Provide for realistic 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,

Co-Chairs Larry Bengé & 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

Reference Materials:

ODP - Shape your City <https://www.shapeyourcity.ca/odp>
Full Draft ODP <https://syc.vancouver.ca/projects/odp/draft-vancouver-odp-eng-full.pdf>
Summary <https://syc.vancouver.ca/projects/odp/summary-sheet-eng.pdf>
Open House Boards <https://syc.vancouver.ca/projects/odp/information-boards-eng.pdf>