

Neighbourhoods for a Sustainable Vancouver

May 28, 2008

Mayor Sullivan and City Councillors
City of Vancouver
453 West 12th Avenue
Vancouver, B.C. V5Y 1V4

Dear Mayor and Councillors:

Re: Third Draft EcoDensity Charter and Initial Actions

Neighbourhoods for a Sustainable Vancouver is a city wide ad hoc organization of neighbourhood groups that includes residents' associations, CityPlan Vision implementation committees, ratepayers' associations and community groups. Further to our previous letters, please accept this letter, with the attached Appendix A, as part of our submission for the review of the third draft of the EcoDensity Charter and Initial Actions that is currently under way. Please post this letter and Appendix A to the City's website for public viewing.

We are disappointed to find that the third draft of the EcoDensity Charter and Initial Actions is no more supportable than its previous iterations. It misrepresents the community's views and does not adequately address the issues that have been raised through the public process. All of the Initial Actions from the second draft, including the most controversial, are included in the third draft, albeit relabeled, renumbered and reorganized. This re-tooling of the language does not reflect any of the substantive changes required to make this document reflective of the community based planning that the citizens of Vancouver want and deserve.

Our previous concerns remain, and new wording raises fresh concerns about the rights of neighbourhoods to be involved in shaping their future and includes significant proposed changes to zoning and land use policy. The third draft:

- proposes an **Interim EcoDensity Rezoning Policy** that would allow direct implementation of housing types that Visions had labeled 'Not Approved (Uncertain)' because they had relatively small neighbourhood support (Action C-2 of the draft Initial Actions),
- allows the creation of 'a **new city-wide plan**, that **builds on** ... the many Community Visions' and would '**build on** existing density and population potential under existing policy and zoning' (Action C-1), but 'build on' seems to mean 'take as a starting point', allowing Visions and local area plans to be overridden,
- defines consultation as including '**future or un-represented voices**' (Part VII. a. of the draft Charter) that could be used to override the actual voices of the existing community, and
- allows Visions and local area plans to be overridden ('**consciously reconsidered**') by Council 'after appropriate process and consultation' (Part VIII. c. of the draft Charter), based on a flawed consultation process (see above).

After three unacceptable drafts, we request that Council withdraw the entire EcoDensity Charter and Initial Actions. The City should simply move ahead and implement the Community Climate Change Action Plan, CityPlan Community Visions and local area plans which are already well thought-out, supported by the individual neighbourhoods and Council-approved.

The only democratic way to map out the future direction for each neighbourhood is through the kind of local area planning that was undertaken in the CityPlan Visioning process. With proposed changes to zoning and land use policy that contradict existing Community Visions and local area plans, Council has

a responsibility to go back to each affected neighbourhood and re-survey residents on any and all potential changes to approved Vision and local area plan directions. This should be done by working with residents (including local Resident's Associations - not just City organized Vision Implementation Committees) through local planning efforts.

Because this draft raises fresh concerns about community consultation and land use policy, and fails to adequately address our previous concerns, we also request that Council allow citizens to directly address the Council meeting when this latest draft is brought to Council for consideration. In a democracy, the community deserves the right to directly address Council about such concerns at a public hearing. Further, since there is no provision or process at all for the incorporation of the public's comments on the third draft, we are concerned that Council intends to ignore the public's comments.

At a roundtable meeting on February 23, 2008 with 20 Dunbar residents, Mayor Sullivan said about EcoDensity "if neighbourhoods don't want to be involved in this, it's not going to happen." The neighbourhoods around this city want to make it clear to City Council that we do not support the EcoDensity Initiative and we hope that the Mayor will live up to his word and City Councillors will listen to the citizens of Vancouver.

For more specific detailed comments on the third draft of the EcoDensity Charter and Initial Actions, please see the attached Appendix A which forms part of this letter.

Regards,
Neighbourhoods for a Sustainable Vancouver

Group contact email: agroupofvancouverneighbourhoods@hotmail.com

Supporting Group names:

- Advocates for Hastings Sunrise
- Arbutus Ridge Concerned Citizens Association
- Arbutus Ridge/Kerrisdale/Shaugnessy CityPlan Vision Implementation Committee
- Britannia Neighbours in Action
- Building Better Neighbourhoods
- Citywide Housing Coalition
- Douglas Park Residents Association
- Dunbar Residents' Association
- East Fraser Lands Committee – Sharon Saunders **
- Friends of Southlands Society
- Grandview Woodland Area Council
- Hastings Sunrise CityPlan Vision Implementation Committee
- Kensington Cedar Cottage CityPlan Vision Implementation Committee
- Kitsilano Arbutus Residents' Association
- Kitsilano Point Residents' Association
- Marpole Oakridge Area Council Society
- Norquay Neighbours – Joseph Jones **
- North West Point Grey Home Owners' Association
- Reinstate Third Party Appeals
- Riley Park / South Cambie CityPlan Vision Implementation Committee
- Shaughnessy Heights Property Owners Association
- South Hill Initiative for Neighbourhood Engagement (SHINE)
- Southwest Marine Drive Ratepayers' Association
- Upper Kitsilano Residents Association
- Victoria Fraserview Killarney CityPlan Committee – Andrea Rolls **
- Victoria Park Group – Gail Mountain **
- West Kitsilano Residents Association
- West Point Grey CityPlan Vision Community Liaison Group *

* Some members of the group indicate support for the letter, but have not voted on it yet due to timelines.

** Signed as an individual member

Cc: Brent Toderian, Director of Planning
Ronda Howard, Assistant Director of Planning – City-Wide and Regional Planning
Kent Munro, Assistant Director of Planning – Community Planning Division
Rob Jenkins, Assistant Director, Current Planning Initiatives Branch
Thor Kuhlmann, Planner, City-Wide Regional Planning
Cameron Gray, Director of Housing
Marco D’Agostini, Senior Heritage Planner

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Neighbourhoods for a Sustainable Vancouver

Appendix A

Attached to letter dated May 28, 2008
Re: Third Draft of the EcoDensity Charter and Initial Actions

Introduction:

This Appendix A is intended to form part of the letter to Mayor and Council dated May 28, 2008 for further detailed comments. We continue to oppose the EcoDensity Charter and Initial Actions, and request that they be withdrawn entirely based on the following concerns.

A.) Positive changes in the third draft

Four issues in the third draft that reflect some of our previous recommendations are:

- The Eco-City section of the Charter has been moved closer to the top. (But unfortunately not to the top.)
- Green buildings are required, not bonused. (This requirement is stated clearly for Actions A-1 and A-2, but Actions C-10 and C-11 still give bonuses which we do not agree with.)
- Affordability has a much more prominent role than in the last draft, with acknowledgement that:
 - Existing buildings are more affordable than new ones.
 - Existing purpose-built rental stock needs to be retained. (But no new specific actions are provided to insure that happens.)
 - Senior governments need to work with the City to create affordable housing programs to build co-ops and subsidized housing.
- The need to allow for heritage and character building retention with consideration of the impacts on existing heritage retention tools. (Some references are made to this need, but there is no specific action about it.)

While the preceding acknowledgments are positive, we have concerns the issues are not adequately addressed. The rest of the third draft still raises many concerns as outlined in sections B. and C.

B.) Principal concerns about the third draft

In our last letter to Council, we raised six main concerns: EcoDensity is not required for the 'eco' part, EcoDensity is not required for the 'density' part, EcoDensity is not required for implementation, concerns about density bonusing, advantages of reusing existing buildings for increased density; and protection of rentals. The third draft fails to address these concerns and in many cases, increases our concerns because of new language in the draft. We especially emphasize our third concern (EcoDensity is not required for implementation) because of new language that undermines the work of CityPlan Community Visions and residents associations.

1. EcoDensity is not required for the 'eco' part.

The Community Climate Change Action Plan can handle the 'eco' part . In 2005 Council passed the Community Climate Change Action Plan (CCCAP), which covered all aspects of

environmental sustainability including smart growth through implementation of CityPlan Community Visions for more compact neighbourhoods. The Community Climate Change Action Plan needs the City to put more resources into implementation, not to waste more time on EcoDensity.

2. EcoDensity is not required for the 'density' part.

The third draft contains misleading density projections. EcoDensity continues to create an illusion of scarcity of density which is simply not true. Based on the City's own estimates, there is easily enough existing zoning capacity for well into the next few decades. See C. 1.) The Charter - b.) below.

3. EcoDensity is not required for implementation.

CityPlan Community Visions and local area plans are how smart growth have been planned through a neighbourhood grassroots process of consultation and implementation, which should be respected by the City. **New language in the third draft undermines this community consultation and implementation.** See C. 1. The Charter – c.) below; and C. 2. Initial Actions C-1 and C-2 below.

4. Concerns about density bonusing.

The role of density bonusing, and how this is being managed, is of continuing concern. The third draft still facilitates governments to use density to fund an ever widening list of under-funded programs. The following are our comments on density bonusing:

- As noted in section A., green buildings are to be required, not bonused. (This is stated clearly for Actions A-1 and A-2, but Actions C-10 and C-11 still give bonuses which we do not agree with.)
- The existing Heritage Density Bank must not be opened up to allow transfer from downtown sites to receiver sites in the outside neighbourhoods. This is still being considered in the Heritage Density Bank Review, which we strongly oppose.
- The provincial government must not be given density bonusing for under-funded programs such as schools, transportation, housing, and now a downtown entertainment district. This is a downloading bottomless formula, where budgets are eventually further cut back with assumptions that density bonusing will be used to make up the shortfall. The tabled BC Bill 27 will give the province access to the City's Development Cost Levies (DCL) account for use toward building public transit.
- The proposal by TransLink to fund transit by speculating on land around potential transit stations and rezoning with higher density is completely unacceptable. This will lead to inflation of land values and increased pressure on housing affordability. TransLink will be essentially forcing the City to approve upzoning in order to obtain the required transit. The land lift should go towards community amenities – not provincial responsibilities. There are alternative options that do not use density bonusing, raising fares or property taxes. Funding could be based on a polluter-pays system where vehicle drivers are charged for their emissions reading and kilometres driven, and the new carbon tax could be reallocated to transit instead of giving tax reductions to business.
- Housing and amenities should not all be provided through density bonusing and land lift. As noted in section A., we are pleased to see acknowledgement that senior governments need to work with the City to create affordable housing programs to build co-ops and

subsidized housing. However, market and subsidized rental housing should be required through rezoning, without providing the developer with density bonusing to do it.

5. Advantages of reusing existing buildings for increased density.

As noted in section A., we are pleased to see that reuse and retention of existing character and heritage buildings were given more consideration in the third draft. However, there needs to be more explicit action to craft zoning so that additional infill and secondary suites are used as an incentive to retain and upgrade existing character buildings. In areas like the Downtown Eastside and Heritage Districts, zoning needs to be used more creatively to make retention of the existing buildings the highest and best economic use. This means outright zoning heights must be lower than the existing building heights. We note that 'Action 12 – Increased building height and density in Gastown, Hastings, and Chinatown Districts' in the second draft has been changed to 'Action B-1 – Historic Precinct Height Study' which continues to promote increased height and density in these areas. Therefore, we continue to oppose this action which will undermine heritage retention and put increased pressure on land values that make affordable housing options less viable and increase evictions.

6. Protection of rentals.

As noted in section A., we are pleased that the third draft acknowledges that existing purpose-built rental buildings are more affordable than new and need to be retained. But there are no actions to protect these buildings from redevelopment. Recent development applications show that the Rate of Change Policy is not adequate when affordable market rental older buildings are redeveloped with less affordable new rental units at a rate less than 1 to 1 replacement and developers are given 50% density bonuses to do it. Replacement should be required at no less than a 1 to 1 rate, (based on equivalent sized units) and not bonused. The Rate of Change Policy should be improved, expanded and extended indefinitely. There should also be tax incentives for owners to upgrade and maintain the existing purpose-built rental stock.

C.) Specific concerns about the third draft

1. The Charter

a.) The third draft is still a density charter. The Eco-City section of the Charter is still superseded by the over-arching primary goal to use density as the primary tool in all city decisions. There still is the implication that density leads to affordability and liveability, rather than making affordability, liveability and environmental sustainability the goals with density as one of many tools to achieve that. It still puts the cart before the horse.

b.) The third draft contains misleading density projections. EcoDensity continues to create an illusion of scarcity of density which is simply not true. Based on the City's own estimates, there is easily enough existing zoning capacity for well into the next few decades, we just need more variety of types and locations of housing, and more affordable options. We have time to plan this in a responsible inclusive way to create an affordable, liveable, and environmentally sustainable City, without making increasing density the number one goal.

When the GVRD developed the Liveable Region Strategic Plan to reduce sprawl and auto dependency, the GVRD indicated it would be beneficial for Vancouver to accommodate 635,000 residents by 2021. There are estimated by the City to be 590,000 residents in Vancouver now and 656,000 residents by 2021, assuming projections based on the last few record breaking

years with no future economic recession. This is well under today's existing zoned capacity of 670,000 residents. The 670,000 is a low calculation because it only includes the 'outright zoned' sites most likely to be built and does not include any additional discretionary Comprehensive Development CD1 rezoning or the additional zoning potential identified in the unimplemented Community Visions.

c.) The third draft of the Charter allows Council to override Visions and local area plans

Part VII. a. of the Charter states: *'These commitments will be achieved with **creative education, engagement and dialogue with all voices, while anticipating the needs of future or un-represented voices.**'*

This redefines consultation as 'creative education' and the City's plan to represent the views of 'future or un-represented voices' could override existing actual community voices.

Part VIII. c. of the EcoDensity Charter third draft provides Council with a way to override what is in Community Visions and local area plans when it states that:

'Where an existing policy, plan, standard or rule (hereafter referred to as "direction") specifically requires or prohibits a decision that may conflict with commitments of this Charter, the City will continue to be governed by the specific requirement or prohibition (e.g., height, density or land use), until the direction is consciously reconsidered by Council after appropriate process and consultation.'

The proposed 'appropriate process and consultation' will be meaningless if consultation is redefined as outlined above, based on creative education and 'future or un-represented voices.' There are many other references to 'consultation' in the Charter and Initial Actions (for example, in Parts VII. c. and f. and Initial Actions C-2, C-4, and C-5), but such consultation is again meaningless if the process for consultation is flawed, as suggested above.

d.) The third draft of the Charter centralizes Vision implementation away from the community.

Parts VII. a. and VIII. c. of the EcoDensity Charter third draft as listed above, also create another centralized process with City backing, rather than working through the established community implementation committees.

e.) The third draft of the Charter grants the City considerable discretionary power, thereby undermining community consultation and implementation.

The draft Charter contains many discretionary aspects of interpretation, consultation and implementation, which allows the City to use the Charter at its own convenience for any particular use it wants. Part VIII. d. makes clear that the City intends to exercise discretionary power. This part states:

'Where existing direction allows flexibility, discretion, interpretation or the weighing of choices, or where there is no governing or guiding direction, approaches that will support the achievement of these commitments [in the Charter] will be emphasized.'

The Charter exercises power over how community consultation and implementation should be done. Part VII. a. of the Charter allows the City to involve 'future or un-represented voices' as it sees fit; Part VIII. c. allows the City to decide what is 'appropriate' in its 'appropriate process and consultation.' Checks and balances are lacking.

2. The Initial Actions

All of the Initial Actions from the second draft have been included in the third draft. They have been relabeled, renumbered, reorganized, but they are all there – even the most controversial ones such as adding height and density to the Heritage Districts. We are left with many of the same concerns as before, with additional new concerns as well. **New language significantly increases our concerns in Actions C-1 and C-2 which centralize implementation of the Community Visions away from the community.** This is further compounded by provisions in the third draft of the Charter that undermine community consultation as outlined above.

ACTION A-1: Rezoning Policy for Greener Buildings

Previous Action 1 – Greener buildings (4 storeys and over)

- Green buildings are to be required, not bonused, consistent with our previous recommendation.

ACTION A-2: Rezoning Policy for Greener Larger Sites

Previous Action 2 – Greater Sustainability for Large Site development

- Green buildings are to be required, not bonused, consistent with our previous recommendation.
- Concerns remain that large sites' height and density will override Visions.
- Concerns increase that any site that is assembled to be over 2 acres will be allowed to override the Community Vision based on this policy.
- The third draft increases concerns that large site development will not go through Community Vision Implementation Committees, but instead go directly to rezoning consultation based on a flawed process defined under the third draft of the Charter to be 'creative education' and 'future or un-represented voices' rather than the existing actual community.

ACTION B-1: Historic Precinct Height Study

Previous Action 12 – Increased building height or density in Gastown, Hastings, and Chinatown Districts

- Although the revised action is renamed and reworded to 'study' rather than implement, it still is an action under EcoDensity to add height and density in the heritage areas. This action should be completely withdrawn from EcoDensity and all development in the area put on hold until a Community Vision process is complete, as requested by the community and the Carnegie Community Action Project (CCAP).
- In spite of stated Council policy, the existing zoning is not designed to create the desired results of a low-income heritage district. The existing heritage buildings are generally only 2 - 4 stories in height, but the outright zoning allows 7 stories. This adds pressure to demolish the existing heritage buildings and build new 7 story market condo buildings while inflating land values. It makes it even more expensive to create affordable housing and to upgrade heritage buildings. An excessive amount of density bonuses and transfers have therefore been created that put pressure on the Heritage Density Bank until this useful tool was flooded with density and put on hold.
- The outright zoning in the DTES and the Heritage Districts should be designed so the highest and best economic use is for the reuse of existing buildings and affordable housing to reflect Council's stated objectives for the area.

ACTION B-2: Community Gathering Places in Each Neighbourhood

Previous Action 16 – Community gathering places

- Community gathering places should be considered as part of the ongoing local neighbourhood planning processes and not imposed through EcoDensity. The concern is that this may be used to give developers density bonuses for every piece of open space on a site, which should be required anyways and not bonused.

ACTION B-3: Greener RS-5 Character Design Guidelines

Previous Action 5 – New green single family zone

- It is unclear what is being proposed here. We continue to oppose any bonusing for green buildings, and even more so in single family zoning.
- RS-5 was originally established to avoid the building of ‘monster’ houses in the 1980’s. The additional height and density that was given for design guidelines, was to allow for a pitched roof and covered porches and other design features to match existing character houses. If these features are not provided in a green design, like say a flat roof rather than pitched, the relaxation of increased height and density should not apply. Otherwise, the intent of RS-5 to avoid monster houses will not be met, actually in fact creating even bigger envelopes of monster houses, which in principle is certainly not green.
- Any changes to RS-5 zoning should require community consultation, and not include ‘future or un-represented voices’ as defined in the third draft.

ACTION C-1: An “Eco” CityPlan

Previous Action 13 – Enabling district energy,
Action 17 – Plan for the longer term, and
Action 18 – Amenity strategies for the longer term

- City-wide long term planning is the most important part of creating a sustainable city. The City already has the existing policies in place that are needed to base a plan on, including the Community Climate Change Action Plan and the CityPlan Community Visions. EcoDensity is not required for city-wide planning.
- Action C-1 – An “Eco” CityPlan of the EcoDensity Initial Actions third draft will create ‘a new city-wide plan, that **builds on** ... the many Community Visions.’ However, Part VIII. c. of the EcoDensity Charter third draft provides Council with a way to override what is in Community Visions and local area plans. Part VIII. c. states that ‘Where an existing policy, plan, standard or rule (hereafter referred to as “direction”) specifically requires or prohibits a decision that may conflict with commitments of this Charter, the City will continue to be governed by the specific requirement or prohibition (e.g., height, density or land use), until the direction is consciously reconsidered by Council after appropriate process and consultation.’ What is ‘appropriate process and consultation’? Will this be the same as the EcoDensity process in which many members of neighbourhood groups showed up to critique the second draft of the EcoDensity Charter and Initial Actions, and the result of that consultation is the third draft, which shows little effect of public input on matters of substance? The proposed consultation will be even more meaningless if consultation is defined as based on creative education and including ‘future or un-represented voices.’
- Where Action C-1 proposes to ‘**build on** existing density and population potential under existing policy and zoning’ – i.e., pre-existing Community Visions and local area plans. It is not defined what ‘build on’ means, but it appears to mean ‘take as a starting point.’ And with the mechanisms available in the third draft, ‘existing policy and zoning’, as defined for instance in the Community Visions, can be overridden.
- The third draft centralizes Vision implementation away from the community. Parts VII. a. and VIII. c. of the EcoDensity Charter third draft and such actions as C-1 and C-2 in the EcoDensity Initial Actions create another centralized process with City backing, rather than working through the established community implementation committees. The

Planning Department already has the ability to deal with the broader planning issues without EcoDensity overriding the community implementation, so EcoDensity is not required for city-wide planning either. It gives no confidence that implementation will respect the intent of Visions, local area plans and neighbourhood character.

- Make it a requirement for developers to pay for new density at a true market value, rather than creating a giveaway for the development industry by blanket rezoning over neighbourhoods
- Adequate public transit must be in place and funded prior to additional density being approved.
- Adequate community amenities must be in place and funded prior to additional density being approved.

ACTION C-2: Interim EcoDensity Rezoning Policy

Previous Action 4 – EcoDensity demonstration in lower density areas

- The previous action was only for demonstrations of new housing types in each neighbourhood. Now the program is being significantly changed to implement the Vision Directions in ways they were never intended under the Terms of Reference for the Community Visions.
- Action C-2 proposes to take housing types that were considered ‘Not Approved (Uncertain)’ and directly implement them anywhere in a neighbourhood without a planning process going through the Community Vision Implementation Committees to determine the appropriate interpretation of the Vision and where these new housing types will go. The Vision document is proposed to be used as an Official Community Plan where it was only intended to inform a further planning process toward a plan. Even the ‘Approved’ housing types and locations are not correlated to each other in most Community Visions, and were only intended to provide a guide for further work, not to bypass community planning to go directly to rezoning and public hearing anywhere on an ad hoc basis. The ‘Uncertain’ housing types and locations were often with very low levels of support, in the low 40 – 45% range, and often within the margin of error where they could have been ‘Not Supported’ outright. These should not be automatically brought forward like this with virtually **no community implementation**. It is unacceptable to bring forward for implementation the Community Vision Directions that were rated as ‘Not Approved (Uncertain)’ in the same manner as if they were rated ‘Approved’.
- Give local neighbourhood planning priority, respect existing plans, and create a more democratic and local community-led neighbourhood planning process that requires broad majority support of local residents. The Community Vision Implementation Committees should be required to complete at least a preliminary area plan which interprets and sets guidelines from the Visions, with extensive community support as demonstrated through community-wide surveys executed early in the process, before any rezoning policies are implemented. The Visions are not comprehensive enough to go directly to rezoning.
- Creating a patchwork of CD-1 rezoned sites may not be practical, especially for smaller single lot sites.

- The Charter contains many discretionary aspects, which allows the City to use the Charter at its own convenience for any particular use it wants. This is contrary to a democratic system and should not be allowed. Checks and balances are clearly lacking and need to be in place ahead of any further implementation or rezoning. Reinstating third party appeals through the Board of Variance would be a minimum starting point.
- Members recall that in defending EcoDensity, Suzanne Anton wrote that staff had requested a less “ad-hoc” basis for planning (or words to that effect). Yet what could be more “ad-hoc” than this “Interim EcoDensity Rezoning Process?” Given the snail-pace of Neighbourhood Centres planning, this action would more appropriately be labeled “Interminable EcoDensity Rezoning Process,” and in all likelihood would function as an ad hoc substitute for comprehensive community-based planning. Similarly, rezoning based on a “Historic Precincts Height Study” is a more ad hoc approach to planning policy than one based on the Community Visions and comprehensive area planning that a broad spectrum of these communities are advocating. It appears that the Director of Planning (and certain members of council) have no problem with “ad-hoc” planning, provided they are the ones making the ad-hoc decisions.
- Rezoning under this interim rezoning policy would undermine existing Heritage retention tools. This policy should therefore require any existing heritage or character buildings to be retained on site and incorporated into rezoning applications wherever possible.

ACTION C-3: EcoDensity Leadership on City Land

Previous Action 6 – EcoDensity leadership on City land

- This is generally supported as long as the projects are of appropriate scale and location, with extensive community consultation and consistent with neighbourhood area planning.

ACTION C-4: New Types of Arterial Mid-Rise Buildings

Previous Action 10 – New options for arterial mid-rise housing

- Upzoning along arterials should only be allowed if, when and where a local neighbourhood supports it in each specific location, as the arterial designation is too broad to be a basis for rezoning. This should be implemented through Community Visions.
- The C-2 zones are too large an area to outright rezone to mid-rise and should only be allowed in specific locations where it is community supported through the Visions and for the provision of an amenity or social housing.
- Avoid demolition of existing older more affordable rental buildings as a priority.
- Extend Rate of Change Policies to C-2 zoning.

ACTION C-5: Issues and Options for Backyard/Laneway Housing

Previous Action 9 – New options for backyard laneway infill housing

- It is noted that this action has changed from locations of pilot projects to report back for options to go toward broad implementation. Any implementation should go through the Community Vision Implementation process with community support, and based on each neighbourhood’s individual character.
- Infill laneway housing pilot projects should only be allowed if, when and where a local neighbourhood supports it. There should be monitoring for unintended consequences over time before expanding to other areas, as may be approved by local neighbourhoods.

- Keep laneway housing as a non-strata rental or family suite that is conditional on retaining an existing character building, in order to protect heritage incentive programs and neighbourhood character.

ACTION C-6: More Options for Rental Secondary Suites

Previous Action 8 – New options for secondary suites within buildings

- If the city is considering allowing another secondary suite in addition to the one already allowed under by-laws, the additional suite should only be allowed if, when and where local neighbourhoods support it. This additional suite as a non-strata rental or family suite should be conditional on retaining an existing character building.

ACTION C-7: Public Amenity and Public Benefit Cost Recovery and Funding Tools

Previous Action 14 – Amenity tools

- Use multiple regulatory options and funding sources for providing public amenities. It is not feasible or sustainable to depend mostly on density bonusing.
- There is a lack of provision for funding for municipal services such as sewers, water, utilities and roads that the increased density will demand, a problem that is now aggravated by the province's new legislation under Bill 27 which allows the province to further download onto municipalities.

ACTION C-8: Discretionary Density Increase for Public Benefits

Previous Action 15 - Density increase flexibility

- The additional 10% density bonus for amenities without requirements for rezoning in the Downtown District and the Central Broadway C-3A District raises many concerns, most of which were noted in the third draft. This 10% is in addition to the 10% presently allowed for Heritage Density Transfer from the Heritage Density Bank, for a total of a 20% bonus which is too much without a requirement for rezoning. The additional 10% for amenities should require rezoning with public consultation.

ACTION C-9: Leftover Lots in Older Apartment Zones

Previous Action 11 – Left over lots

- Considering relaxations in existing multi-family, medium density areas on minimum lot sizes, setback requirements, and parking regulations may threaten the last remaining heritage and character houses in these zones, which often have multiple affordable rental suites. Any relaxations should require the retention of such heritage and character buildings and/or rental units replaced at a 1:1 rate based on same size units, required, not bonused.

ACTION C-10: Removal of Barriers to Green Building Approaches

Previous Action 3 – Incentives for green design

- Green buildings should be required, not bonused. Action C-10 still gives bonuses which we do not agree with.

ACTION C-11: Priority to Applications with Green Leadership

Previous Action 7 – Priority to applications with green leadership

- Green buildings should be required, not given special benefits such as priority to applications.

- This action would undermine incentives for priority to heritage projects.

ACTION C-12: Accountability for EcoDensity Follow-Through

Previous Action 19 – Measurement tools

Action 20 – Panel

Action 21 – Progress report structure

- This action involves the creation of an EcoDensity “Think Tank” comprising volunteers that ‘should include expertise in various aspects of sustainable city-building, as well as representation from the City’s Vision Implementation committees.’ The Think Tank is to publish EcoDensity Progress Report Cards and perhaps hold ‘events or summits to facilitate discussion and learning’. We are concerned that the Think Tank will create another layer of administration, that it will not adequately represent the views of neighbourhoods, and generally, that it will be of questionable benefit.

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