

Neighbourhoods for a Sustainable Vancouver

November 22, 2010

Metro Vancouver Board
4330 Kingsway,
Burnaby, B.C. V5H 4G8

Re: Metro Vancouver Regional Growth Strategy, Public Hearing

We are a network of about 30 neighbourhood groups across the City of Vancouver. Please accept and include this as our additional comments on the Draft Regional Growth Strategy (RGS) for the public hearing process.

Please consider the following:

Revise the schedule - We are concerned that the current draft of the RGS has not been put out for public consultation before proceeding to first and second reading and public hearing. Once the adoption process is initiated, the options for amendment are limited.

Previous concerns not addressed - Because the issues raised in our previous letters to Metro Vancouver have not been adequately addressed, those issues still apply. Many of the changes in the new draft raise additional concerns.

RGS is not community supported - We do not support the transfer of authority or influence over land use planning within the City of Vancouver to senior levels of government, other than for protection of green zones and industrial land to prevent sprawl. The proposed changes in the November 12, 2010 draft of the Regional Growth Strategy Bylaw do not address this concern.

The main concerns are:

1. The new draft is even weaker than the previous draft with regard to the region's most important roles: protection of green zones and prevention of urban sprawl. We note that the Urban Containment Boundary has expanded into the Agricultural Land Reserve and Conservation/Recreation zones with additional future expansion allowed in Special Study Areas. We do not support this urban sprawl.
2. The new draft continues to propose unsupportable levels of regional control over municipal Official Community Plans and municipal planning processes for development. This undermines neighbourhood-based local area planning which we support.
3. The new draft continues to allow TransLink too heavy an influence over land-use decisions in Metro Vancouver through its say in Metro Vancouver's Regional Growth

Strategy and Regional Context Statements, and through its role in the development of Frequent Transit Development Areas or Corridors. This gives Metro Vancouver, TransLink and the Province significant influence in land use planning, which we do not support. TransLink's role should be restricted to the provision of transit, not to land use.

4. There are no definitions or procedures for establishing Regional Land use Designations or overlays. It is unclear what these mean and questionable whether they should be used in the City of Vancouver which already has a transit service grid covering nearly the entire city.

5. TransLink's provincial mandate to use real estate development as a source of funding based on the Hong Kong model is a systemic conflict of interest with TransLink's influence in land use policy. Transit should be funded by a polluter-pay model based on vehicle levies, gas taxes and carbon taxes, **not** on property taxes, from real estate development (in lieu of public amenities) or increased fares.

6. The new draft has removed the Glossary with definitions and instead refers to the provincially controlled Municipal Act. This lacks transparency and gives the province an unnecessary and unacceptable degree of influence over the RGS.

7. The approval requirements for Type 1 major amendments of the RGS have been reduced from 2/3 vote of the Metro Board to only 50%+1 vote. It is not clear where this has come from and why.

8. There is no provision in the RGS for Metro Vancouver or affected local governments to have influence in changes to legislation that relate to the RGS.

As discussed above, we request the schedule for public consultation be further extended for public input on the current draft RGS prior to consideration by the Metro board for referral to the affected local governments for acceptance. Our concerns have not been adequately addressed and the public have not been properly informed.

A major change of land use policy such as this **should go to referendum.**

Regards,

Ned Jacobs,
On behalf of the Steering Committee
Neighbourhoods for a Sustainable Vancouver

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