

Neighbourhoods for a Sustainable Vancouver

April 2, 2008

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

Dear Mayor and Councillors:

Re: Draft EcoDensity Charter and Initial Actions – Report to Council dated Feb. 18, 2008

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 as part of our submission for the special Public Hearing currently underway.

We again request that Council withdraw completely the proposed EcoDensity Charter and Initial Actions. They are based on flawed concept, content and process. EcoDensity has an 'eco' part and a 'density' part. EcoDensity is not needed for either of them. The City's Community Climate Change Action Plan can handle the 'eco' part. CityPlan Community Visions and local area plans, implemented through the Neighbourhood Centres Program, can handle the 'density' part. The City should simply move ahead with these pre-existing initiatives. EcoDensity, which is unnecessary and not supported, should be withdrawn completely and valuable staff time should not be wasted on a third draft.

EcoDensity is not required for the 'eco' part. In 2005 Council passed the Community Climate Change Action Plan (CCCAP), which covered transportation, district energy systems, retrofitting existing buildings to increase energy efficiency, green building technologies and smart growth through implementation of CityPlan Community Visions for more compact neighbourhoods. This addresses balanced sustainability, where EcoDensity does not deal with environmental sustainability in a significant way. Therefore, we do not need or support a Density Charter, where density is the number one tool that takes priority over the other aspects of sustainability and is used to circumvent due process. The implementation of a broader, holistic ecological approach, as covered in the Community Climate Change Action Plan, is consistent with our group's position in all of our previous documents.

EcoDensity is not required for the 'density' part. When the GVRD developed the Livable 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 there is no 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.

Moreover, the Community Visions were undertaken to identify greater variety of housing types, and will create more capacity even though the additional capacity is not required.

EcoDensity is not required for implementation. CityPlan Community Visions and local area plans are how smart growth should be planned through a neighbourhood grassroots process, which should be respected by the City. Visions are currently implemented through the Neighbourhood Centres Program (and local area plans could be also). The Neighbourhood Centres Program just needs to be made more transparent and democratic for broad community support, to address the issues that came out of the

Norquay Village Vision implementation proposal. Any changes to the terms of reference for the program should require neighbourhoods' support and must include a balance of affordability, liveability and environmental sustainability. The Planning Department already has the ability to deal with the broader planning issues without EcoDensity, so EcoDensity is not required for that either.

Concerns about density bonusing. The role of density bonusing, and how this is being managed, is of increasing concern. Although major sites with single owners such as Coal Harbour and Concord Lands have added some amenities, smaller sites with multiple owners have limited opportunities. The following are our comments on the proposed density bonusing:

- Green buildings should be required for all new construction, and they should not be given density bonuses for this, regardless of how 'highly' green they are.
- The existing heritage density bank must not be opened up from downtown to receiver sites in the outside neighbourhoods.
- The provincial government must not be given density bonusing for under-funded programs such as schools, transportation, and housing. This is a bottomless formula, where budgets are eventually further cut back with assumptions that density bonusing will be used to make up the shortfall.
- 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 kilometers 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. The City must work with senior governments to obtain funding and consider using some assets from the City's Property Endowment Fund.

Advantages of reusing existing buildings for increased density. Retention and reuse of existing character and heritage buildings creates opportunities to reduce demolition going into the landfill, reduces the impact of extracting and manufacturing materials for new construction, retains older stock which is more affordable, and protects heritage programs while retaining the character of neighbourhoods that surround heritage buildings. Increasing the height and density in the heritage districts of Gastown, Chinatown and the Downtown East Side are opposed and the heritage districts need to be protected as a whole. They should be sheltered from speculation to avoid more single-room occupancy (SRO) closures or conversions that create more homelessness; to avoid increased pressure on land prices to keep land available for social housing; and to avoid displacement of the existing community.

Wherever possible, increasing density should be framed as an incentive to retain and upgrade existing character buildings. For instance, where it is community supported, non-strata infill and secondary suites could be used as incentives to retain and upgrade existing character houses. This could create additional aboveground affordable rental units with no additional government funding. It is also important that the federal government exempt additional secondary suites and infill from capital gains tax on principal residences. Additional suites and infill should only be implemented where the neighbourhoods support them. The existing secondary suite program was approved across all RS zones only after many years of trials in supported neighbourhoods to allow the unintended consequences of requiring covenants and building code changes to be addressed.

Protection of rentals. The existing purpose built rental buildings must be permanently protected. For instance, the West End has a significant amount of affordable housing due to rental buildings built before 1970. These rentals will never be replaced because developers do not build market non-strata rental buildings any more. Even if they did, new construction would be more expensive than the existing older buildings are today. There should be tax incentives for owners to upgrade and maintain the existing stock.

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 want to make it clear that we do not support the EcoDensity Initiative. We request that the City completely withdraw the entire EcoDensity Charter and Initial Actions, and do not proceed with a third draft. Please work with the neighbourhoods to implement the already well thought out Council approved Community Climate Change Action Plan, the CityPlan Community Visions, and local area plans for those areas without Visions.

Regards,
Neighbourhoods for a Sustainable Vancouver

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Neighbourhoods for a Sustainable Vancouver

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
- Burrardview Community Association
- Citywide Housing Coalition
- Douglas Park Residents Association
- Dunbar Residents’ Association
- East Fraser Lands Committee – Sharon Saunders **
- Friends of Southlands Society
- Grandview Woodlands 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 – Joe 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 *

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

** Signed as an individual member