

Neighbourhoods for a Sustainable Vancouver

May 20, 2009

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

Dear Mayor and Councillors:

Re: Metro Vancouver Regional Growth Strategy Draft

We support development of a more comprehensive and effective Regional Growth Strategy to insure that the municipalities of Metro Vancouver complement and reinforce the mutual goal of accommodating growth sustainably. We also recognize that municipalities within the region vary and have somewhat different roles to play, as do their constituent neighbourhoods. Please accept this as our general comments on the staff report to Council for the Metro draft as above. We concur with the staff report that the timelines are much too short for broad and detailed consultation as this kind of plan requires. We urge the City and Metro Vancouver to extend the public consultation process with all amendments to the draft resubmitted for further public review and additional input.

Our concerns with this proposal are mainly related to a substantial change of governance for municipal planning process, lack of clarity in the proposal, and using the Regional Growth Strategy to give TransLink, which is now in the land development business, undo influence in municipal planning. Our preliminary comments are as follows.

1) Provincial control of municipal Official Community Plans (OCP):

Unlike previous regional growth plans, this draft proposes shifting the authority over land use decisions. The Regional Context Statements and the Official Community Plans (OCP) would require Metro Board approval for compliance to the Regional Growth Strategy; TransLink approval of the OCP and large developments for implications to the regional transportation system; and Provincial approval for developments along highways. This is an attack on the principle of subsidiarity; it would make municipal officials less accountable and public involvement in planning virtually meaningless. We agree with the staff report that recommends municipalities retain control over land use planning and approvals within their boundaries. If Council's intent is to restrict Metro authority to green zones, office parks and industrial areas, then Council could support staff recommendation D, but have specific exemptions for only those three areas of green zone, office parks and industrial. Also, because of TransLink's real estate development conflict of interest, TransLink should be allowed to review and comment only, but all authority should come from the Metro Board, not TransLink.

2) TransLink's conflicted roll as both planning regulator and developer:

Land lift is a municipal asset that is used to provide amenities such as community centers, parks, and facilities. TransLink has been given a mandate to raise funds through real estate speculation, rezoning and land lift to pay for transit which is primarily a provincial responsibility. We strongly oppose this downloading onto municipal governments. It appears that the Province is using the Metro Vancouver Regional Growth Strategy to facilitate TransLink real estate dealings by giving this unelected board authority over land use decisions that could override municipalities. Since

TransLink and their private development partners would have a financial stake in those decisions, conflicts of interest would be systemic.

3) Regional growth strategies are too prescriptive:

The details outlined on pages 16–18 of the draft report are overly prescriptive in regard to density bonus provisions, variable development cost charges, reduced parking and other financial incentives for development. Although municipalities may choose to use such incentives from time to time, they involve significant trade-offs, and should not be prescribed in the Metro plan as they would be routinely used to fund transit and possibly other provincial responsibilities in place of amenities. The prescription for “Large-scale, high density commercial office and retail uses” in the Metro Core ignores and could conflict with the imperative to retain an adequate supply of old but functional buildings—essential for maintaining commercial diversity and affordable spaces for new ideas and enterprises.

4) Frequent Transit Development Corridors are too broad:

The Frequent Transit Development Corridors as shown on Map 2 are described on Figure 2 (page 18) as 400 to 800 metres on both sides of the corridor for medium and high density development. In some municipal locations this may be reasonable if they have a generally large lot layout and only a few transit corridors. However, in Vancouver, 400 to 800 metres would result in mass upzoning of the entire city! The Metro plan should generally describe transit oriented development to be close to transit without specifying where it should be located. Detailed community planning within municipal boundaries should be under the sole jurisdiction of the municipality.

5) Provincial control of developments along highways:

Developments impacting highways should also be under municipal control. It is a concern that requirements for provincial reviews of developments along highways could be a way for the Province to use land lift and rezoning to fund highway improvements. Again, this would constitute down-loading. While such authority might ostensibly be a check on car-dependant sprawl, it could actually facilitate environmentally destructive highway-oriented residential, commercial or industrial development.

6) Green zones would be more vulnerable:

Under this proposal green zones would be more easily removed from protection, which would make them subject to “horse-trading” between municipalities, a practice we oppose. Also, some green zones are shown within Urban Containment boundaries and should be excluded so they cannot be developed (e.g. UBC Endowment Lands and the North Shore).

7) Timelines for public consultations are inadequate:

We agree with the conclusions under “Public input to date” in the staff report. There has not been enough time for the public or their elected representatives to understand the issues and to respond. We implore Council to insist on an extension of the Metro public consultation. The deadline for all input by May 22, 2009 is not acceptable.

These and other concerns raised at the May 20th public forum confirmed that more work and substantive changes are required. To this end we support a better opportunity for public participation.

Regards,

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

Group contact email: nsvancouver@hotmail.com