

VanRIMS No.: 08-3000-11

The Vancouver City Planning Commission is an advisory body appointed by Vancouver City Council to assist in an advisory capacity by considering and submitting reports on matters relating to planning and development of the City. Other Commission tasks include: representing ideas and opinions about the future of the City of Vancouver; submitting an annual budget proposal to Council; and considering a report to Council on any proposal likely to have a significant effect on the future of the City. The following represents the views of the Vancouver City Planning Commission. The Vancouver City Planning Commission is not expressing views on behalf of the City of Vancouver.

May 13, 2022

Dear Mayor and Council:

RE: Broadway Plan Feedback (Phase 4)

At its meeting on May 4, 2022, the Vancouver City Planning Commission passed the following motion:

THAT the Vancouver City Planning Commission will put forward a letter to Mayor and Council regarding the Broadway Plan.

As part of its mandate to advise Mayor and Council on issues relevant to the future of the city, the Vancouver City Planning Commission (VCPC) wishes to take this opportunity to provide input and comment regarding the draft Broadway Plan. The VCPC recognizes the momentous undertaking the Broadway Plan process is and reinforces the transformational impact the Plan will have on the City's future.

As a diverse group that represents a broad spectrum of people in Vancouver, we were not unanimous in our support or our comments for the Broadway Plan. **For this reason, we feel that it is important to share all of our feedback so that you have the full breadth of our opinions as you make your decision. We are therefore including in this letter a dissenting opinion signed by Commissioners Ruby Langan and Gabrielle Peters, followed by comments and recommendations representing the views of the rest of the Commission.**

Dissenting Opinion

Disabled people are dying due to their inability to secure housing that is affordable and accessible to them. In some cases people are actually applying for MAiD (medical assistance in death) who were not terminally ill nor near the end of life, specifically as a result of their inability to secure housing that is accessible to them.

The lack of actually affordable and fully accessible housing is a human rights crisis and we are in an emergency situation. And yet there has been no political recognition or provision of an emergency response to this fact.

For this reason we ask that the Mayor and Council reject the current Broadway Plan. The plan includes motherhood and apple pie statements about diversity, accessibility, and inclusion without any specifics. And yet, the same is not true of density. The plan does not simply state that it will aspire to density. It is quite specific. The City must include a similar level of detail about what exactly is meant by diversity and inclusion and must be very specific about accessibility.

In order to prevent more unnecessary deaths the City of Vancouver must immediately establish guidelines that go beyond the current standard for accessibility.

Air conditioning must be standard in all housing and universally applied in the same way that heating currently is.

Accessibility standards must include the multiple accessibility needs that exist, often in combination, including but not limited to those with severe allergies, scent, chemical, environmental and sound sensitivities.

To this end, the City of Vancouver must identify an area of land suitable for small, detached units for those whose accessibility needs prohibit them from being able to live in multi-family buildings.

The City of Vancouver must also immediately adopt trauma-informed design standards for its shelters and housing and incorporate them as part of accessibility standards.

The City of Vancouver must create transitional trauma-informed housing options for those transitioning from extended periods of living outdoors in tents.

A basic of housing design is emergency evacuation. It is illegal to build housing without including those elements that have been deemed necessary for non-disabled people to escape in a fire or other emergency. It is currently legal to house disabled people in housing where they have no means of independent escape during a fire or emergency. The fire standards for housing need to be brought in line with human rights and this must be reflected in design and accessibility standards for housing.

There must be a complete citywide ban on poor doors. Protection for tenants must not only include the ability to move back at the same or lower rent, but into a space with the same amount of square footage. Moving costs for tenants must also be included.

Multiple crises overlap and converge and disabled people, particularly those who are poor and low income, racialized and otherwise marginalized, are dying as a direct result of government policy. It is time to put policies in place that will save lives, not end them.

Sincerely,

Gabrielle Peters
Ruby Langan
Commissioners, Vancouver City Planning Commission

VCPC Comments and Recommendations

VCPC urges Council and Staff to consider the following:

- **Inclusion, Diversity, and Accessibility:** We are pleased to see that principles of diversity, inclusion, and accessibility are embedded throughout the plan. However, without clear definitions or metrics, those words can become afterthoughts. Diversity, inclusion, and accessibility should be as easily defined and measured as density and zoning areas.

Recommendations: Have explicit definitions for diversity, inclusion, and accessibility within the plan, and how those definitions relate to all policy areas. Suggestions include: no poor doors, no separate entrances or paths for accessibility, and inclusion of specific building and public space designs from different communities.

- **Built Form:** Many of the 'Mid- to High-Rise' and 'High-Rise' Apartment Areas specify a maximum of two towers per block. This policy suggests that tower locations will be determined as applications are reviewed/permitted. The practicality of this process is questioned and is anticipated to create an inefficient approvals process. Situations can be foreseen where applicants race against one another and further pressure the approvals process to be considered the 1st or 2nd permitted tower on the block. In areas with high development interest, future 'spot' rezonings can be anticipated to permit 3rd or 4th towers. The policy also does not set out a process for blocks wherein tower developments already exist.

The creation of higher density 'Station Areas' are inconsistent and limited. The application of 'Station Areas' have a geographic discrepancy east/west; the Granville and Arbutus Station Areas are limited to the adjacent station blocks (all within less than a

170m radius of the station) whereas on the east side the Main Station Area consumes multiple blocks, many not adjacent to the station itself and as far as half kilometer away.

Additionally, there is some concern in the Draft Land Use policies that the relationship between height and density, particularly in the shoulder areas, may need more consideration and definition. Specifically, the concern is with the density of 9.0-10.0 FSR applied in shoulder areas (Granville/Burrard Slopes Area B, Broadway Should areas) with only 25-30 storey building heights, which would lead to dense and blocky towers. Allowing these buildings to reach 35 storeys, which would still provide a step down from station areas, would lead to thinner floor plate sizes. Other relationships between FSR and building height should be further studied to see the resulting forms.

Recommendations: Approach station area development equally east/west, review the creation of limited Station Areas at Granville & Arbutus.

Anticipate locations where higher densities/towers are appropriate and will be desired, and provide relevant development permissions (as opposed to considering tower development at 2 per block).

- **Family Friendly Corridor:** The Broadway Plan's growth can anticipate an increase in families in the corridor. Current schools and childcare centres in the area are already at capacity, many with lengthy waitlists. These pressures will be combined with the additional demand created by the Seńákw development. The Broadway Plan outlines an objective for approx. "250-400 replacement and new childcare spaces" dependent on funding that is either unconfirmed (ie. senior levels of government) or that will be created through the development itself (ie. DCLs, CACs) leaving the delivery of any additional family-oriented infrastructure (ie. childcare or schools) to follow development.

Recommendations: Incentivize the creation of new purpose-built in-home multi-age childcare in new residential development through density bonusing programs or parking reductions (ie. the creation of purpose-built residential units that are 'pre-designed' to meet the in-home multi-age childcare requirements).

Engage the Ministry of Education and Vancouver School Board to anticipate and serve the Area's projected school enrollment demands in before more families move into the Corridor.

Work with MoTi to ensure that childcare is congregated as close as possible to transit stations, and even within transit stations. There is a section that speaks to childcare and did not mention the co-locational use between child care and transit (especially along the new proposed and existing train routes).

- **Businesses:** The Broadway Plan area currently has a diversity of office, retail, industrial, service, and health related employment areas. In particular there are many businesses in the corridor that promote repair, as opposed to replacement, reducing overall consumption and carbon use. Maintaining these services and employment

opportunities will lessen the need to commute out of the area for daily needs, thus reducing residents' anticipated carbon footprint.

The Plan sets out multiple goals for preserving and protecting 4 identified industrial and employment areas, but more policy to preserve Broadway's commercial diversity is encouraged.

Recommendations: Create policy to maintain and enhance Broadway's commercial diversity, with special attention to businesses that fall under the Climate Emergency Action Plan.

Under light industry (with no noxious and dangerous businesses), co-locate affordable housing and also childcare centres in these areas as well.

Ensure greater opportunities in neighbourhoods with laneways to have Accessory Commercial Units such as small coffee kiosks, community food pantry opportunities, home based childcare opportunities (utilizing aspects of the lane way as the outdoor play area), small fresh groceries etc.

- **Affordable Housing:** The Plan sets out significant rental supply goals for both market and below/non-market development which is applauded. The Broadway Plan should further define its support for tenants given the anticipated level of redevelopment set to occur.

The Plan aims to enable renters to stay in their neighbourhood, with minimal displacement and permit their return to renewed or redeveloped rental sites at "discounted rental rates" equivalent to 20% below city-wide average market rents. It is unclear the term of the 'discounted' rental rate (i.e. is it tied to the tenant or the unit?). If the former, there is an anticipated net loss of affordable units as tenants frequently relocate when displaced.

The Plan does not currently identify a process for preserving rents at existing rates for tenants currently living in market rental buildings that will be redeveloped. The Plan states that 83% of existing purpose-built rentals in the area are over 50 years old. It is anticipated that many of these renters have long-standing tenancies that are significantly below current market rates.

In anticipation of new rental opportunities, the Plan predominantly focuses on serving market and (just) below-market renters. The Plan needs to further anticipate, support and include the creation of new housing for those of greatest financial need and experiencing homelessness (ie. shelters, supportive housing).

Recommendations: Protect existing rent levels for tenants in rental buildings anticipated to be redeveloped.

Identify and include opportunities for new shelter and supportive housing developments.

- **Public Space:** The reduction of vehicular lanes along Broadway and transformation into the public realm is celebrated. This redesign largely focuses on exterior public spaces and is encouraged to take into account the creation of new interior public spaces, to provide accessible areas to warm/cool and seek shelter. And, as Broadway becomes a Great Street, it must become a more accessible street. This includes more benches and public seating in both public areas and along sidewalks.

Recommendations: Include areas of interior public space that are safe, accessible, and free for residents and ensure that existing public space is preserved and enhanced.

Ensure that public seating is available and accessible at regular intervals in both public spaces and along sidewalks.

Ensure that for social service buildings in closest proximity to transit stations, etc., that wayfinding details and access to washrooms as a public and human right use can be mapped out and programmed as an accessibility need in the absence of access to washroom facilities in Skytrain stations.

- **Climate Justice and Community Resilience:** The Plan calls for sustainability and resilience measures such as green buildings, use of low-carbon energy, and seismic resilience. However, we are already seeing the immediate and fatal effects of climate change in our city, with disproportionate impacts on equity-denied communities. We encourage further thought into embedding climate justice and ways for community resilience to flourish into the Plan.

Recommendations: Embed principles of climate justice and community resilience, including adaptability of indoor public spaces for cooling or clean air shelters and spaces for mutual aid.

Identify laneways in residential areas and potential commercial areas where loading areas aren't located in the rear lane that could be changed into laneway parks and green spaces, in the absence of park development and in order to deal with concerns and complaints that there aren't enough parks.

We greatly appreciate the time that staff has spent on the Plan and the transformative effect that it will have on our city. As you deliberate, we encourage you to think about the Broadway Plan as not just a land use plan, but as a *people* use plan, and to keep in mind the people that will live, work, and move through the Broadway Corridor for decades to come.

Sincerely,

Robyn Chan
Chair, Vancouver City Planning Commission

Copies to: Paul Mochrie, City Manager
Teresa Jong, Executive Assistant to the City Manager
Councillor Pete Fry, Council Liaison
Theresa O'Donnell, Director of Planning and General Manager, Planning, Urban Design, and Sustainability
Chris Robertson, Assistant Director, City-Wide and Regional Planning, VCPC Staff Liaison
Katrina Leckovic, City Clerk
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