

May 21, 2022

City of Vancouver Mayor and Council 453 W 12th Avenue Vancouver, BC V5Y 1V4

Dear Mayor and Members of Council,

Re: Broadway Plan

Housing Central is a strategic alliance of the non-profit and co-operative housing sectors in British Columbia. We welcome the opportunity to comment on one of the most significant proposals to come before Council during its current term.

We write to express our broad support for the Broadway Plan based on the demonstrable need for more rental housing and office space in the Broadway corridor. We also accept that the heights and densities proposed will be required to achieve the Plan's goals over time, but we are mindful that the planning horizon is 30 years and that the change will occur in carefully planned increments. Clearly, we need new housing supply if we're to accommodate future population growth, but **this growth cannot come at the expense of the affordable homes people already have.**

This Plan represents an opportunity to renew and expand much needed and all too scarce purpose-built rental housing (including non-profits and co-ops) to create more homes in more liveable communities. There are roughly 4,000 homes in the community housing sector in the Plan area, and we should be able to increase this number significantly without the need to acquire more land.

We acknowledge that a city needs to plan for its longer-term future, and that this will inevitably create stress for existing communities. Change will always be accompanied by stress, and the test for any plan is how well it anticipates future needs while mitigating disruption and dislocation for citizens, particularly the most vulnerable and disadvantaged among us. That is precisely why the Plan's stated outcomes – more affordable, diverse, equitable and inclusive neighbourhoods – cannot be reduced to a slogan. Amendments to the proposal should be considered only if they make the achievement of these important outcomes more likely.



To ensure the protection of existing residents, the Plan cannot be adopted without the stronger tenant protections currently proposed by Mayor Stewart. If these protections are weakened or removed, the implementation of the Plan will simply become an extended exercise in tenant displacement, with predictable consequences.

In fact, we would urge Council to extend the recommended tenant protections to include the entire City. One shouldn't have to live along the Broadway corridor to benefit from the most progressive tenant protections in the country when tenant displacement is a reality everywhere.

These protections may also slow the pace of development, which will allow for a phasing of the Plan and the thoughtful and temporary relocation of displaced residents. On balance, slowing the pace of redevelopment isn't a bad thing, particularly if Council is prepared to allow additional density in RS-1 zones simultaneously.

Some commentators have suggested that the planning process is out of sequence and that the Vancouver Plan ought to have been first on the drawing board. When the Vancouver Plan is ultimately developed, we hope it will include the gradual elimination or restriction of RS and RT zones. This will ease the pressure to go higher on major transportation corridors and reduce even further the risk of tenant displacement. The community housing sector has long advocated for smart, transit-oriented development and renewal, but areas like the Broadway corridor will always shoulder a disproportionately heavy load if 85% of the City's land mass is reserved for single or semi-detached homes.

While it is encouraging to note that two-thirds of new homes developed under the Plan will be market, below-market or non-market rental homes, the target of 20% below-market or non-market is not nearly ambitious enough. The Plan should include provisions to set aside sites for community housing developers and operators as a first step to increasing the number of non-market homes.

The theme of liveability features prominently in the Plan, yet there is a surprising lack of emphasis on priorities like cycling infrastructure, parks, schools, and daycares, along with other amenities and services for the many thousands of new community residents and workers. The absence of a commitment to universal accessibility is particularly glaring and should be added in consultation with experts with lived experience, and a particular emphasis on those who face exclusion due to income, race, and gender.

Finally, the express commitment to reconciliation is perhaps the vaguest section in the Plan, and we call on the City to increase its efforts to consult Indigenous stakeholders to make this commitment real and tangible.

In conclusion, we look forward to a discussion of how we can partner with you to shape the housing policy and practice of the City over the next 30 years.



We urge you to engage the community housing sector more actively on how best to move forward, with a priority on the protection of existing communities that are already affordable and the protection of the City's most vulnerable and disadvantaged citizens from the impact of change.

Sincerely,

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