

Supplemental Information for Riverwood Proposal
Submitted by iPlan
June 18, 2020

We wish to provide the following information to respond to questions and concerns expressed in the June 10, 2020 staff report and to respond to discussion points made during the Electoral Director's Committee Meeting June 15, 2020.

Waste Water

CVRD staff have advised the board that many private waste water utilities have had operational and sustainability issues. The staff report points to many of these problem plants being constructed under old regulations. Technology has improved. Locally Mount Washington has a functional private system as do newer developments around the province. If desired, we would be pleased to commission a study on the sustainability and reliability of the current waste water treatment options. However, we also think that the Province regulates this and current standards will most likely produce better results.

Number of Residential Units

The June 10 staff report raises the question as to number of residential units. Our proposal requests approval for 445 residential units with secondary suites. This is a conventional way of describing single family dwellings with secondary residential units. However, we agree with the staff report that it is accurate to recognize the secondary suites as discrete residential units. In fact, it is accurate to describe these as purpose built rental units. As such Riverwood would be perhaps the largest development with purpose built affordable housing rental units in the Comox Valley.

Urban Sprawl

The staff report notes that the current OCP designation of Rural is intended to minimize urban sprawl. This is a concept that deserves some discussion. The term Urban Sprawl is often used and commonly in a negative way. However, it is a contested and loaded term with no universal definition. Here are a few definitions:

1. Urban Sprawl is "the spreading of urban developments (such as houses and shopping centers) on undeveloped land near a city" (Merriam-Webster)
2. "Urban sprawl is widespread development outside city centers, usually on previously undeveloped land. Also called suburban sprawl, urban sprawl is often created by developing farmland, forests, and wetlands. It is characterized by having few people per acre, homes that are separate from commercial and industrial areas, and branching street patterns." <https://toxtown.nlm.nih.gov/sources-of-exposure/urban-sprawl>

“Urban sprawl is basically another word for urbanization. It refers to the migration of a population from populated towns and cities to low density residential development over more and more rural land. The end result is the spreading of a city and its suburbs over more and more rural land. In other words, urban sprawl is defined as low density residential and commercial development on undeveloped land.” (<https://www.conserve-energy-future.com/causes-and-effects-of-urban-sprawl.php>)

In looking at these definitions, the common aspects are low density development on green field sites.

This type of growth is included in your RGS and OCP (e.g., settlement nodes and urban expansion areas). Further, in terms of new development, our proposal is relatively dense. Of the 46 hectares of land proposed for residential development, there are 780 residential units which equates to 16.95 units per hectare. About double the density of typical residential neighbourhoods.

The issue of greenfield development was examined during the process for preparing the Canadianized LEED ND standards through the Canadian Green Buildings Council from 2006 to 2009. It was determined that we could not meet the need for new development in Canada without greenfield sites. The result would be a lack of supply which would greatly exacerbate housing affordability. Greenfield sites are necessary and likely this is why they are part of your RGS and OCP.

Notwithstanding any debate about the need for greenfield development, this proposal does not increase the amount of planned greenfield development. It relocates an existing planned development site to a location that has already been cleared leaving the remaining environmental values intact on the current planned site.

There are differences between urban expansion and settlement nodes but these are largely jurisdictional, i.e., are they developed as part of a municipality or within the Regional District. Both are planned urban development. Arguably, this proposed settlement node is similar geographically to an urban expansion area because of its proximity to the City of Courtenay. In terms of access to the main urban center, it is also the closest greenfield site making this one a better fit with many of your goals and policies.

Directing development to existing Settlement Nodes

The staff report emphasizes that current RGS policy directs development to existing settlement nodes/existing developed areas. This proposal would shift a planned urban development area to an adjacent area, and it does not represent the majority of new development in the district.

Built-Green versus the Energy Step Code

The staff report does not embrace using Section 219 covenants for ensuring buildings are constructed under the built green certification program and it identifies the “Energy Step Code” program for energy efficiency. One concern is the administration and enforcement of the covenants.

We would accept not having to register the covenants to this effect. However, it is worth noting that a covenant scheme would essentially be implemented the same as the Energy Step Code program. Both would allow your building department to ensure that plans submitted for construction meet either the Built Green standards or the Energy Step Code. In the case of the 219 process or the Energy Step Code, there would be no need to have any ongoing administration or monitoring after completion of construction. The Energy Step code is focused on energy conservation. Built green includes this and also other environmental matters like construction materials, waste management, etc. These are in fact complementary paths, not binary options. Both can be implemented.

With no additional administrative burden, the 219 covenants would result in development that is more environmentally responsible than simply using the Energy Step Code.

Affordable Housing

The report notes that our proposal does not include any details on how the proposed housing units will be made affordable. We are pleased to address this further.

Housing is made affordable in a number of ways. The first is through an adequate supply of housing units so that a supply/demand imbalance does not drive up prices. Our submission references this very important point and references a local report citing this issue. To be fair, this is an issue found in many communities on Vancouver Island. Housing un-affordability is increasing. It is critical that local governments ensure that there is adequate supply to not only meet the growth needs but sufficient available supply to also keep prices down. This proposal assists this effort.

With respect to the affordability of the units themselves, as the staff report indicates, the proposal includes up to 330 secondary suites, 54 town house units and 56 multifamily units. In the Comox Valley the 2015 average economic household income was \$89,004.00. The average lone parent household income was \$48,837.00. These income levels are most likely to be higher in 2020.

Using the CMHC definition of housing affordability (30% of gross income), these average incomes equate to \$2,225 per month for the average household and \$1,220 per month for the average lone parent household. A review of the local rental rates

for apartments and suites shows these to be in the range of \$900 to \$1400 per month) in the Comox Valley. All of the secondary suites in this development will be affordable units for the average household as well as for most, in not all, of the lone parent households.

With respect to the affordability of the town house and apartment units, reviewing the current listings shows a range of prices from \$225,000 to \$474,000 (excluding the luxury market) with a cluster around \$400,000. At a three percent interest rate, it would cost about \$2,218.00 a month to service a \$400,000 mortgage. Therefore, it is reasonable to conclude that all of the apartment and town house units will add to the stock of affordable housing. With the assistance of suite rental revenue, this approach may make the single family dwellings much more affordable to the home purchasers.

The staff report states that the region has not been able to provide truly affordable housing. The proposed development affordable housing strategy will succeed in addressing that failure and will do so without government funding.

The benefits of the secondary suite affordable housing model are considerable:

- 1) affordable housing is provided in an inclusionary way. They are included throughout a community rather than being segregated into parts of the community;
- 2) Secondary Suites double normal neighbourhood densities in a largely invisible way;
- 3) Secondary Suites provide income to the home owner and that income can serve to make their home purchase achievable; and
- 4) Secondary suite affordable homes do not take a government bureaucracy to operate or maintain.

One question raised at the Electoral Services committee was whether there was a way to ensure that rental rates remain affordable. We think that there is a way to do this through a registered housing agreement. However, we think that this would be unnecessary given that the rental rate for suites are considerably below the 30% of income for the average household in the Comox Valley.

Climate Change and GHG Emissions:

The staff report identifies the policy goals addressing climate change and GHG emission reduction. To reduce energy consumption and GHG emissions the development will include a neighbourhood shopping complex. Further measures to address GHG emissions and climate change include: building solar ready homes, providing transit facilities, bicycle facilities and electric car charging stations in the commercial centre. We would be open to exploring other ideas to address this goal further.

Shifting Planned Growth as Regionally Significant:

We agree with the staff report's assertion that shifting the planned growth from "urban expansion area" to "settlement node" is regionally significant in terms of local government investment decisions. By going from planned urban expansion to a settlement node which has water and wastewater infrastructure that is 100% privately funded, local government funds are freed up to invest in other areas. This is beneficial to the local government tax payer and allows local governments to focus on other investment priorities.

We have presented our proposal as shifting planned growth and this is accurate. We would note, however, that this shift geographically is very minor. It would be moved from one side of the Puntledge River to the other side across a planned greenway that the Region wants.

Interface Fire Hazard Protection

Information was requested at the committee meeting about how the development addresses Interface Fire Hazard protection. We will be please to address this in a more fulsome explanation but can advise that the development concept addresses it as follows:

- 1) The development location takes advantage of the firebreak provided by the Inland Island Highway, and the Brown's and Puntledge Rivers.
- 2) The layout of land uses augments these firebreaks by providing for a second firebreak with cleared agricultural land surrounding the development.
- 3) The development is encircled with an access route/trail that would be capable of fire fighting vehicles and personnel to access and defend the development from an interface fire.
- 4) The development will restrict roofing materials to asphalt shingles and will incorporate other building restrictions consistent with Fire Smart design principals.

Food Production

Information was requested regarding how the development would support local food production. We can expand on this further but offer the following points as follows:

- 1) The development will add to the supply of agricultural land in the area surrounding the development.
- 2) The agricultural land will be improved and made ready for agriculture.
- 3) The development would include allotment gardens adjacent to the perimeter trail.
- 4) The allotment gardens will be provided with water service. These gardens would act as a food productive buffer to the adjacent proposed farm land.

- 5) The zoning is proposed to include the sale of produce and other agricultural products.
- 6) The central commercial area will be designed to include a local farmer market area for local production to be sold and exchanged.

Consistency with Regional Goals and Policies

We have addressed the broad land use policy goals of the RGS and OCP and suggest that this proposal advances currently planned urban growth but in a slightly different place proximate to the current planned location. In addition, the staff report points out that the proposal would meet Objective 2.2 of the Parks and Greenway strategy.

We would like to also point out the other very important regional policies and goals that this proposal would facilitate. These are described in Appendix A to our proposal and found on pages 13 to 19 of the agenda package. Our proposal facilitates many regional goals and policies and in some cases, without the development of the Riverwood lands, some goals may not be possible to achieve unless the lands are purchased by the CVRD. For brevity, I will summarize these goals and policies:

- 1) The RGS notes the need for affordable housing. This proposal delivers this in a very large, effective and positive way (both in terms of new supply and also in terms of the form)
- 2) The region's transportation plan calls for a road and bikeway link through the lands. This proposal delivers this at no cost to the tax payer. Without the development of these lands, or a direct land purchase, these connections would likely not be achievable.
- 3) The proposal realizes one of the key parks and green way goals. Without the development of these lands, or a direct land purchase, these goals would likely not be achievable.
- 4) The proposal realizes the goal of riverfront access and trail development. Without the development of these lands, or a direct land purchase, these accesses would likely not be achievable.
- 5) The proposal is environmentally low impact as it would occur on a logged and cleared area of land.
- 6) The proposal will contribute to local food production with the adjacent lands being improved for farming and with the provision of allotment gardens for the residents to use.
- 7) The proposal supports First Nations economic development.
- 8) The proposal responds to the goal of promoting electric vehicles.
- 9) The proposal responds to addressing interface fire hazard in its design.
- 10) The proposal protects key natural and environmental features along the Brown's and Puntledge Rivers. Without the development of these lands, or a direct land purchase, this protection will not be achieved. Use under the current zoning would seriously damage those values.

- 11) The proposal responds to the broad growth management policy of keeping development in settlement nodes. This would be a new settlement node that replaces an urban expansion designation.
- 12) The proposal responds to residential intensification through the inclusion of secondary suites, townhouses and apartments.
- 13) The proposed development provides opportunities for living, working, playing and shopping within the lands as well as growing food.

In conclusion, the Riverwood Settlement node is key to the ability of the Comox Valley Regional District to achieve several of its important regional growth management, parks and greenway, and transportation goals. The plan is consistent with many of the CVRD's growth management policies. It would be an important measure to start addressing the housing affordability crisis that has developed in the Comox Valley. It does not create additional planned settlement areas; rather, it shifts planned growth from one part of the property to another part. Finally, with the Riverwood Settlement node, a very important and cherished part of the Comox Valley will be protected from potential resource extraction activities and be accessible to public use and enjoyment.

We thank you for the opportunity to present our proposal and we look forward to working with you and the community to further develop this proposal.