

Response to June 10 staff report on 3L Proposal  
Submitted by iPlan  
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Thank you for the opportunity to participate in this meeting with you and to address some of the points raised in the staff report. .

I also want to express our desire to work with you to make changes to the proposal as may be necessary and desired, and to follow up with additional information as requested. I am personally grateful for the professionalism and assistance provided by your staff.

First I will address a number of the report's discussion points and with then finish by addressing the policy support for this proposal within your RGS, OCP, Transportation Master plan and parks and Greenways Plan.

### **Waste Water**

Staff have reported that "Many waste water utilities challenged" A 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. We understand that the Province regulates this and that current regulations are producing sustainable results.

### **Number of Residential Units**

The report raises the question as to number of residential units. Our proposal requests approval for 445 residential units with 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 appropriate to recognize the secondary suites as discrete residential units. In fact, it is appropriate to describe these as purpose built rental suites. As such, Riverwood would be perhaps the development with the largest amount of 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>)

The common aspects in these definitions 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 which are essentially greenfield developments). In terms of density, 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 an integral part of your RGS and OCP. In other words, urban sprawl is supported by those documents.

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 development site.

There are differences between urban expansion areas and settlement nodes but these are largely jurisdictional, i.e., whether they are developed as part of a municipality or within the Regional District electoral area, the land uses remain the same. 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 compared to other Settlement Nodes.

### **Directing development to existing Settlement Nodes**

The staff report emphasizes that current RGS policy directs the majority of 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 identifies the "Energy Step Code" program for energy efficiency as a preferred alternative. 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. 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 states 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. One primary way is through an adequate supply of housing units so that a demand imbalance does not drive up prices. Our submission addresses this very important point and references a local report citing the lack of supply in the local affordability 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. These combined represent 58% of the housing 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. Reviewing the local rental rates for apartments and suites they appear 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, if 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. This means that 58% of the housing would be truly affordable. How many large developments have met this level of affordable housing in the Comox Valley?.

The staff report states that the region has not been able to provide truly affordable housing. Our 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, as part of a community rather than segregated from 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.

#### **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 that can be accessed by walking from all of the residences. Further measures to address GHG emissions and climate change include : building solar ready homes and providing transit facilities, bicycle facilities and electric car charging stations in the commercial centre.

#### **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 changing 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 geographical shift 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 desires.

#### **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 appreciate this being recognized.

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 of affordable housing).
- 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.
- 3) The proposal realizes one of the key parks and green way goals.
- 4) The proposal realizes the goal of riverfront access and trail development.
- 5) The proposal is for an environmentally low impact development 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 goals.
- 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 Browns and Puntledge Rivers.
- 11) The proposal responds to the broad growth management policy of keeping development in settlement nodes.
- 12) The proposal responds to residential intensification through the inclusion of secondary suites, townhouses and apartments.
- 13) The proposal 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.