



Electoral Area Committee Meeting Date: October 15, 2010
Regional Planning Committee Meeting Date: October 8, 2010

To: Electoral Area Committee
From: Jason Smith, Regional Planner, Policy and Planning Department
Date: October 4, 2010
Subject: **Comments on Proposed UBC Land Use Plan Amendments**

Recommendations:

That the Board:

- a) offer the following initial comments to UBC on the proposed Land Use Plan amendments:
 - i. Metro Vancouver requests UBC to re-examine and adjust the Land Use Plan amendments to increase opportunities for on-site student housing and reduce the potential for market housing;
 - ii. Metro Vancouver requests UBC to establish height regulations in the Land Use Plan that would address the concern of the visual impact of development on Pacific Spirit Regional Park;
 - iii. Metro Vancouver requests UBC to ensure that sufficient open space is provided for recreation and associated municipal-type park facilities on its lands, therefore alleviating any future pressure for those type of uses to be provided in Pacific Spirit Regional Park;
 - iv. As required by Ministerial Order 229, UBC provide an updated Regional Context Statement to Metro Vancouver for written comment.
- b) delegate authority to provide formal comments on the actual proposed amendments to a special committee made up of the members of the Regional Planning Committee and the Electoral Area Committee should the circumstance arise that a public hearing on the proposed land use amendments is scheduled at such a time that the Board would not be able to meet in time to provide comments.

1. PURPOSE

The purpose of this report is to provide an overview of the proposed Land Use Plan amendments and offer initial comments to the University of British Columbia on how the land use proposals impact regional interests.

2. CONTEXT

In June 2010, the provincial government enacted legislation that transferred the responsibility for local land use planning for the University of British Columbia (UBC) Vancouver Campus from Metro Vancouver to the Minister of Community and Rural Development.

Comments on Proposed UBC Land Use Plan Amendments

Electoral Area Committee Meeting Date: October 15, 2010

Regional Planning Committee Meeting Date: October 8, 2010

Page 2 of 8

There were provisions made for the UBC Board of Governors to oversee any land use amendment processes. Subsequently, UBC initiated a process to amend the re-named Land Use Plan (formerly known as the UBC Official Community Plan).

2.1 Regional Interest

With the new legislation, Metro Vancouver's perspective has changed to focus only on regional interests. There are two regional interests that arise in considering the proposed Land Use Plan amendments at UBC:

1. Regional distribution of population and employment growth and impact on infrastructure
2. The protection of Pacific Spirit Regional Park.

2.2 Regional Land Use Planning

Metro Vancouver has an interest in the regional land use impacts of the proposed Land Use Plan amendments. UBC is proposing a significant increase in market housing, doubling the allowable floor space area for residential and commercial uses, in the areas where non-institutional development is permitted. Some of this is intended for the use of UBC employees and their families and Metro Vancouver supports the provision of this type of housing.

Metro Vancouver's concern is about the regional implication of significant residential development at UBC that would not be for students or employees. UBC states the changes they are contemplating in the Land Use Plan would allow for a non-student population of between 25,000 to 35,000 people. The current population in market housing is 6,410, so the proposed Land Use amendments envision an additional 19,000 to 29,000 people in the area for family housing. The current student population is 8,800 and the Vancouver Campus Plan (approved by the Board of Governors in June 2010) envisions an additional 8000 units of student housing. This would result in a total population on campus of between 41,800 and 51,800. The current target in the OCP adopted by the Metro Vancouver Board in 1997 is a population of 18,000 in 2021 and this includes students. This is summarized in the table below.

Table 1 - Population Targets

2008 Population	Current OCP Land Use Plan Targets (2021)	Proposed UBC Population
Residents: 6,410 Students in residence: 8,800	18,000 with students	41,800 to 51,800 including students in residence

This level of population growth was not contemplated in the preparation of the Livable Region Strategic Plan or the new Regional Growth Strategy. There are a number of concerns with this level of growth, especially if this results in substantial commuting off campus. UBC should clarify of those 25,000 to 35,000 non-students living they envision living on campus, how many would be employees and their families?

UBC is required to prepare a Regional Context Statement as part of its Land Use Plan. Under Ministerial Order 229 dated August 18, 2010 (Attachment 3), the Board of Governors is required to forward any new or amended Regional Context Statement to the chief planning officer of the Greater Vancouver Regional District for written comments on the relationship between the new or amended Regional Context Statement and the GVRD's Regional Growth Strategy. The Regional Context Statement must be submitted to Metro Vancouver prior to submitting a new Land Use Plan or an amendment to the Land Use Plan to the Minister (Attachment 1, clause 16).

Given the scope of changes proposed in the amendments an updated Regional Context Statement is clearly required, Metro Vancouver should request that an update to the Regional Context Statement be part of the amendment package, including population, employment, and student projections for the years 2021 and 2031.

2.3 Pacific Spirit Regional Park

The region's interest in protecting Pacific Spirit Regional Park is impacted in two ways by the proposed amendments to the Land Use Plan; first, in terms of the provision of open space for recreation and, secondly, in terms of the built form of development.

The provision of open space for recreation and associated municipal-type park facilities is an important factor to consider. If there is an inadequate amount of space provided on campus this could have impacts on Pacific Regional Spirit Park (e.g., pressure to provide space for municipal-type park facilities). The current range is 0.5-1.1 hectares per 1000 people. According to the tables provided in the policy briefs, see tables 1-3 of the Policy Brief: Amenities for Family Housing in Attachment 5, there is considerable access to open space on the UBC campus. UBC should ensure that it meets the best practice it mentions of 1.1 hectares per 1000 people.

The built form of development near or bordering Pacific Spirit Regional Park may have impacts on the park. Metro Vancouver has some concerns about changes being made to built form provisions and their potential impact on Pacific Spirit. UBC proposes to remove the maximum height limit of 53 metres (18 storeys) in all areas covered by the plan. Building heights and their impact on Pacific Spirit Regional Park have been an issue in the past (e.g., Marine Drive Student Residences). The loss of maximum height restrictions allows for this issue to arise again with no clear policy direction on how to protect park uses impacted by the height of buildings. Metro Vancouver asks that UBC develop and include in its Land Use Plan policies and land use controls that would ensure that there are no negative impacts on Pacific Spirit Regional Park as a result of the built form of development at UBC.

The existing Official Community Plan contains several policies that work towards protecting Pacific Spirit Regional Park and the retention and strengthening of those policies is in the region's interest.

2.4 Land Use Plan Amendment Process and Public Consultation

UBC began the amendment process with a public consultation program that so far has consisted of two open houses held on July 15, followed by a 2-week online consultation period. The UBC staff has also held meetings with several groups, such as the University Neighbourhood Association Board of Directors, Alma Mater Society, City of Vancouver and the Friends of the Farm.

Comments on Proposed UBC Land Use Plan Amendments

Electoral Area Committee Meeting Date: October 15, 2010

Regional Planning Committee Meeting Date: October 8, 2010

Page 4 of 8

Metro Vancouver staff attended the open houses in July and met to discuss the amendments with UBC staff in early September.

According to UBC staff, the proposed Land Use Plan amendments will work towards achieving the following three objectives:

1. Simplifying the academic designations;
2. Changing the designation of the UBC Farm;
3. Improving housing affordability and community sustainability.

The meeting with UBC staff did not involve any details about the proposed amendments and focused on the objectives mentioned above and the rationale for why amendments were being sought.

In September, UBC staff presented the UBC Board of Governors with a report (Attachment 5) outlining the process for amending the Land Use Plan, the rationale for why changes were needed, a general outline of what those changes would be and the next steps towards adoption of the proposed amendments.

Additional public consultation began on September 27, 2010 with online consultation and there will be three public events on October 13 and 14. The public consultation period will end October 15. Metro Vancouver received a letter from UBC requesting comments by October 27, 2010. UBC staff will return to their Board with the results of the consultation and a public hearing is planned for the end of November.

The actual wording of the proposed amendments has not been made public. This makes it difficult to provide precise comments on the amendments and their implications. UBC is required to provide an updated regional context statement but this has not been provided in any materials made public to date. The policy briefs provide some detail as to what is being contemplated but it is not possible to ascertain exactly what is going to be adopted or how the revised land use plan will eventually read. This issue was raised with UBC staff and the response was that they were working on the precise wording and that they would be released when completed, in advance of the public hearing.

2.5 Outline of Proposed Land Use Plan Amendments

This UBC report (Attachment 5) provides some detail as to what the proposed Land Use Plan amendments are, though the specific wording of the amendments was not presented. UBC is proposing to reduce the number of designations for the UBC Campus to four. They would be 'Academic', 'Green Academic', 'Primary Village Centre Academic' and 'Family Housing and Commercial Areas'. See the draft map in Attachment 1 for the boundaries of the proposed designations. A brief overview of each designation is provided below along with an initial analysis on how these proposed designations may impact regional interests.

a) Academic

The Academic designation would encompass all the lands intended primarily to support the academic mission of the university. Uses contemplated in this designation range from class rooms, commercial space, and student housing and support services. The rationale for this designation is that it would reduce the number of designations for academic uses and recognize that a modern university campus is a mix of uses. This rationale seems appropriate and does not impact the regional interest.

There is no clear indication of student housing densities or number of units. The recently adopted Campus Plan envisions as many as 8000 new student housing units but this number is not reflected in what has been provided to date. Clarity on the actual number of units is of interest to Metro Vancouver in terms of its growth projections.

It is proposed to remove the maximum height limit of 53 metres. Building heights and their impact on Pacific Spirit Regional Park have been an issue in the past (e.g., Marine Drive Student Residences). The loss of maximum height restrictions allows for this issue to arise again with no clear policy direction on how to protect park uses affected by the height of buildings.

The Academic designation does incorporate policies around stormwater management and cliff erosion. This is an issue with the interface with Pacific Spirit Regional Park and it is beneficial to have these policies in the Land Use Plan. There needs to be ongoing discussions of this issue with Metro Vancouver Regional Parks staff.

b) Green Academic

This designation would encompass the lands of UBC Farm, all of the lands currently designation 'Fields, Stadium, Botanical Garden' and the green edges of the campus. This designation appears to indicate that these lands will not be used for intensive, building-related academic uses, but rather will be kept as open areas to support land-based teaching, community engagement and athletics. It makes links to other planning documents for UBC Farm (*Cultivating Place*), athletics and recreation and the Botanical Garden that provide further policy detail as to appropriate uses.

The future of UBC Farm has been a local and regional issue in the past. These proposed amendments begin to give some clarity as to how these lands will develop in the future. They have stated that no family housing will be built on the farm but are silent on other types of housing. A specific designation unique to the UBC Farm listing permitted uses would give more clarity to this use.

The region has an interest in the adequacy of open space for active and passive recreation and associated municipal-type park facilities for residents. If there is an inadequate amount of space provided on campus this could have impacts on Pacific Spirit Park (e.g., pressure to provide space for municipal-type park facilities. The current range is 0.5-1.1 hectares per 1000 people. According to the tables provided in the policy briefs, see tables 1-3 of the Policy Brief: Amenities for Family Housing in Attachment 5, there is sufficient access to open space on the UBC campus to meet the requirements.

c) Primary Village Centre Academic

This is the smallest of the designations and it seeks to foster a pedestrian village with shops and services on the University Square area at University Boulevard and East Mall. Based on the information received to date this designation does not seem to have an impact on any regional interests.

d) Family Housing and Commercial Areas

This designation is proposed to encompass all of the non-academic land used for housing and commercial uses. It consists primarily of the existing designations of "Existing Housing Areas" and "Future Housing Areas".

Comments on Proposed UBC Land Use Plan Amendments

Electoral Area Committee Meeting Date: October 15, 2010

Regional Planning Committee Meeting Date: October 8, 2010

Page 6 of 8

The changes contemplated in this designation are the most significant. It is proposed to more than double the buildable area by raising the floor space ratio (FSR) to an average of 2.5. The current averages are 1 FSR in existing areas and 1.2 FSR in future housing areas.

Given that this is an average for the whole designation and that most of the existing development complies with the 1-1.2 FSR average, new development could proceed at a much higher FSR than 2.5 yet still comply with the overall average of 2.5.

It is also proposed to remove the unit cap of 100 units to the hectare, to remove maximum height limit of 53 metres, to remove the policy direction that housing be primarily four storeys, and to remove the policy direction that 40% of new housing will be ground oriented. There does not seem to be any proposed limits on heights in the revised plan. As mentioned earlier height of buildings has been an issue in regards to their potential impacts on park uses and there will no longer be any policy direction on this issue.

There are several areas within this designation that are intended to receive "transferred" density, see Attachment 2. This density is supposed to be coming from the areas that are currently designated "Future Housing Reserve," but no density is assigned to the current "Future Housing Reserve" so there is no real density to transfer to other areas. Additionally, it is not clear what it means to be an area that has increased density.

The current Official Community Plan provided for a target of 18,000 residents including students in residence by 2021. Current population counts show there are 6,410 people in family housing and 8,800 in student residences for a total of 15,210.

The policy brief describes a need for a population 25,000 to 35,000 people within the family housing designation to support local commercial activities and to provide affordable housing. This would result in an additional 19,000 to 29,000 people over the existing population. If current student numbers are added to this as well as the 8000 places in the planned student residences as shown in the Campus plan, the campus population could reach 41,800 to 51,800, or two to three times the population contemplated in the existing OCP.

This level of population growth was not contemplated in the preparation of the Livable Region Strategic Plan or the new Regional Growth Strategy. There are a number of concerns with this level of growth, especially if this result in substantial commuting off campus. There are no guarantees in the plan that the new housing will be primarily for staff, students, and faculty. The existing transit service with some modest improvements can support demand from the university. Adding additional people will require additional services on and off campus and current regional plans do not envision expensive high capacity investments to the peninsula. Community infrastructure, including additional schools would need to be built. Meanwhile in the City of Vancouver, many existing neighbourhoods would benefit from additional population to help keep schools open and utilize existing community infrastructure.

UBC states that the planned large increases in population are being made in an attempt to provide more affordable housing on the UBC Campus. UBC staff proposes that allowing these increases in density will allow for utilization of more efficient construction techniques and the development of smaller units, which could lead to more affordable housing. However, there is no indication how the proposed increase in floor space will be allocated in terms of unit size and price of rental and ownership housing.

It is also proposed to nearly double the ratio of commercial area permitted in this designation, from 0.74 to 1.4 square metres of commercial floor space per resident. UBC uses the argument that in order to provide a complete range of shopping and services, considerably more commercial space is needed and “maintaining a healthy and sizable year round population is then critical to the success of the commercial area”. The proposals therefore are to substantially increase neighbourhood commercial space and the locations would be determined in the neighbourhood plans. This would also have potential implications for the employment projections for the area.

3. ALTERNATIVES

The following options are provided for the Committee’s consideration:

That the Board:

- a) offer the following initial comments to UBC on the proposed Land Use Plan amendments:
 - i. Metro Vancouver requests UBC to re-examine and adjust the Land Use Plan amendments to increase opportunities for on-site student housing and reduce the potential for market housing;
 - ii. Metro Vancouver requests UBC to establish height regulations in the Land Use Plan that would address the concern of the visual impact of development on Pacific Spirit Regional Park;
 - iii. Metro Vancouver requests UBC to ensure that sufficient open space is provided for recreation and associated municipal-type park facilities on its lands, therefore alleviating any future pressure for those type of uses to be provided in Pacific Spirit Regional Park;
 - iv. As required by Ministerial Order 229, UBC provide an updated Regional Context Statement to Metro Vancouver for written comment.
- b) delegate authority to provide formal comments on the actual proposed amendments to a special committee made up of the members of the Regional Planning Committee and the Electoral Area Committee should the circumstance arise that a public hearing on the proposed land use amendments is scheduled at such a time that the Board would not be able to meet in time to provide comments.

or

- c) Recommend alternate direction on initial comments to the proposed UBC land use plan amendments.

4. CONCLUSION

Several issues have been raised in this initial review with respect to regional impacts of proposed land use amendments, though it is challenging to make complete comments in the absence of the actual wording for the proposed amendments and in the absence of a Regional Context Statement. The main concern is on the level of population growth contemplated at UBC. This will have implications on the regional transportation system and community infrastructure. UBC is an important academic institution for the region and the Province and its development as a university of renown is supported.

Comments on Proposed UBC Land Use Plan Amendments

Electoral Area Committee Meeting Date: October 15, 2010

Regional Planning Committee Meeting Date: October 8, 2010

Page 8 of 8

However, the development of the non-academic portion of the campus raises concerns and there appears to be a risk of some circularity in the supporting arguments. Additional commercial space is proposed to serve the increased population.

Increased non-academic housing is proposed to make the commercial space more viable. And the increase in both is then used to justify more public investment in supporting infrastructure.

The regional interest is best served by first expanding the opportunities for on-campus student housing, and secondly for providing affordable housing for family and staff. A significant increase in market housing, which will undoubtedly be 'high end' in terms of price, may benefit the university financially but this may equally increase the pressure for costly public infrastructure investment. This is not consistent with regional growth plans or the regional interest. It is therefore staff's recommendations that UBC be requested to re-examine and adjust its proposed plans to increase the supply of on-campus student housing and decrease the amount of pure market housing.

ATTACHMENTS

- 1 Map 1 – Draft Land Use Plan Designations for Academic Lands UBC's Vancouver Campus (Doc. #4478333).
- 2 Map 2 – Draft Diagram: Transfer of Housing Density from Farm + Other Areas (Doc. #4478429).
- 3 Ministerial Order M 229 dated August 18, 2010 (Doc. #4398558).
- 4 UBC's Request for Agency Comment on UBC's proposed Draft Land Use Plan Amendments (Doc. #4461511).
- 5 UBC Board of Governors Report dated September 12, 2010, titled "Land Use Plan Amendment Process – Referral of Policy Proposals to Public Consultation" (Doc. #4467370).