

POLICY REPORT DEVELOPMENT AND BUILDING

Report Date: January 16, 2018

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RTS No.: 12336

VanRIMS No.: 08-2000-20

Meeting Date: January 30, 2018

TO: Vancouver City Council

FROM: General Manager of Planning, Urban Design and Sustainability

SUBJECT: CD-1 Rezoning: 431-455 West King Edward Avenue

RECOMMENDATION

- A. THAT the application by Integra Architecture Inc., on behalf of 1022003 B.C. Ltd., the registered owner, and CIBT Education to rezone 431-455 West King Edward Avenue [Lots 13 to 15, Block 661, District Lot 526, Plan 2913; PIDs: 013-343-700, 013-343-742, and 013-343-769 respectively] from RS-1 (One-Family Dwelling) District to CD-1 (Comprehensive Development) District, to increase the floor space ratio (FSR) from 0.70 to 2.01 FSR and the height from 10.7 m (35 ft.) to 14.6 m (48 ft.) to permit the development of a four-storey residential building containing a total of 42 secured market rental housing units, be referred to a Public Hearing together with:
 - (i) plans prepared by Integra Architecture Inc., received on July 14, 2016;
 - (ii) draft CD-1 By-law provisions, generally as presented in Appendix A; and
 - (iii) the recommendation of the General Manager of Planning, Urban Design and Sustainability to approve the application, subject to the conditions contained in Appendix B;

FURTHER THAT the Director of Legal Services be instructed to prepare the necessary CD-1 By-law generally in accordance with Appendix A for consideration at Public Hearing.

B. THAT, if after Public Hearing, Council approves in principle this rezoning and the Housing Agreement described in section (c) of Appendix B, the Director of Legal Services be instructed to prepare the necessary Housing Agreement By-law for enactment, after the Housing Agreement has been agreed to and

- signed by the property owner(s) and their mortgagee(s) prior to enactment of the CD-1 By-law contemplated in this report.
- C. THAT, subject to the enactment of the CD-1 By-law, the Subdivision By-law be amended generally as set out in Appendix C;
 - FURTHER THAT the Director of Legal Services be instructed to bring forward the amendment to the Subdivision By-law at the time of enactment of the CD-1 By-law.
- D. THAT Recommendations A through C be adopted on the following conditions:
 - (i) THAT the passage of the above resolutions creates no legal rights for the applicant or any other person, or obligation on the part of the City and any expenditure of funds or incurring of costs is at the risk of the person making the expenditures or incurring the cost;
 - (ii) THAT any approval that may be granted following the Public Hearing shall not obligate the City to enact a by-law rezoning the property, and any costs incurred in fulfilling requirements imposed as a condition of rezoning are at the sole risk of the property owner; and
 - (iii) THAT the City and all its officials, including the Approving Officer, shall not in any way be limited or directed in the exercise of their authority or discretion regardless of when they are called upon to exercise such authority or discretion.

REPORT SUMMARY

This report evaluates an application to rezone three lots located at 431-455 West King Edward Avenue from RS-1 (One-Family Dwelling) District to CD-1 (Comprehensive Development) District to permit the development of a four-storey residential building with a total of 42 units of secured market rental housing over one level of underground parking. The site is located within the Cambie Village neighbourhood of the *Cambie Corridor Plan*.

Staff have assessed the application and conclude that it generally meets the intent of the *Cambie Corridor Plan*. If approved, the proposed 42 secured market rental units would contribute to the City's rental housing targets in the newly adopted *Housing Vancouver Strategy*. Staff support the application, subject to design development and other conditions outlined in Appendix B. Staff recommend that the application be referred to Public Hearing, with the recommendation of the General Manager of Planning, Urban Design and Sustainability to approve it, subject to Public Hearing and to the conditions in Appendix B.

COUNCIL AUTHORITY/PREVIOUS DECISIONS

Relevant Council policies for this site include:

- Cambie Corridor Plan (2011)
- Rental Incentive Guidelines (2012, last amended 2017)
- Riley Park-South Cambie Community Vision (2005)
- Housing Vancouver Strategy (2017)
- Green Buildings Policy for Rezonings (2010, last amended 2017)
- Housing and Homelessness Strategy (2011)
- Family Room: Housing Mix Policy for Rezoning Projects (2016)
- Vancouver Neighbourhood Energy Strategy (2012)
- Community Amenity Contributions Through Rezonings (1999, last amended 2017)
- High-Density Housing for Families with Children Guidelines (1992)
- Renewable City Strategy (2015)
- Urban Forest Strategy (2014)

REPORT

Background/Context

1. Site and Context

This 2145.0 sq. m (23,088 sq. ft.) site is located midblock on the northern side of King Edward Avenue, between Cambie and Yukon Streets (see Figure 1). The site is comprised of three lots with 45.7 m (150 ft.) of frontage along King Edward Avenue and a depth of 47.2 m (155 ft.). To the immediate west is an approved rezoning proposal for a six-storey residential building. To the east, at Yukon Street, is a completed four-storey residential building. To the south, across from the subject site, a seniors care complex is under construction consisting of six-and four-storey buildings. Across the lane to the north are detached single-family houses which are included in the planning for Phase 3 of the Cambie Corridor, currently underway. The subject site is located on a major arterial with regular bus service and is within one block of the King Edward Canada Line station.

2. Policy Context

In 2011, Council adopted Phase 2 of the *Cambie Corridor Plan* (the "Plan"). Subsequent to a comprehensive planning process, the Plan identified land uses, density ranges, building heights and building forms for sites along the arterial streets within the Cambie Corridor.

Section 4 of the Plan (the "Neighbourhoods" section) provides direction for development in each area of the corridor, including neighbourhood character, public realm and urban design principles. The subject site is within the "Cambie Village" neighbourhood. For this site, subsection 4.2.4 of the Plan specifically supports residential buildings up to four storeys in height with upper level stepped back above the third floor. A density range of 1.25-1.75 FSR is suggested in the Plan, but is not a maximum. Supportable density is to be determined by analysis based on site-specific urban design and public realm performance. Buildings are also expected to provide front doors to the street and activate and enhance adjacent lanes by providing active uses or townhouses at the rear.

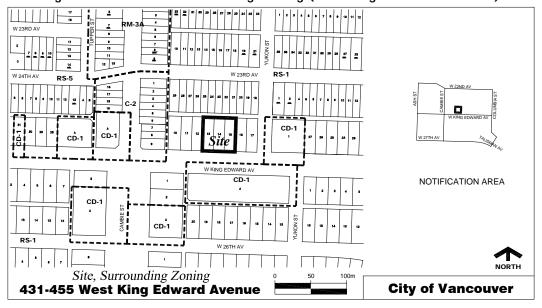


Figure 1 - Site and surrounding zoning (including notification area)

The proposal includes a common indoor and outdoor amenity space at grade. A proposed condition of approval included in Appendix B would require the indoor and outdoor amenity space to move to the building rooftop, as well as the introduction of a children's play area. This condition is in line with the *High-Density Housing for Families with Children Guidelines*.

In July 2016, Council adopted the *Family Room: Housing Mix Policy for Rezoning Projects*, updating family unit requirements for new rezoning applications to provide a minimum of 35% of total units as suitable for families, including a minimum of 25% two-bedroom units and a minimum of 10% three-bedroom units. This application proposes that 37 of the 42 units be two or more bedroom units, achieving 88% of the total units as suitable for families. A condition of approval has been included in Appendix B to ensure that this unit mix is maintained.

Strategic Analysis

1. Proposal

The application proposes to rezone three lots located at 431-455 West King Edward Avenue from RS-1 (One-Family Dwelling) District to CD-1 (Comprehensive Development) District. A four-storey residential building is proposed, including a lane-facing townhouse building. (see Figure 2). In total, the application proposes 42 secured market rental housing units (5 one-bedroom units [12%], 24 two-bedroom units [57%], 11 three-bedroom units [26%], and 2 four-bedroom units [5%]). A density of 2.01 floor space ratio (FSR) is proposed with a building height of 14.6 m (48 ft.). One level of underground parking is proposed with access from the lane and a total of 54 vehicle parking spaces and 57 bicycle storage spaces.

2. Land Use and Density

The proposed residential land use and density are consistent with the four-storey residential buildings anticipated in the *Cambie Corridor Plan*. The Plan indicates that supportable density

on any particular application is to be determined by analysis of site-specific urban design and public realm performance. Staff have concluded that, based on the proposed built form, setbacks and massing, that a density of 2.01 FSR is appropriate for this site, subject to the design conditions noted in Appendix B.

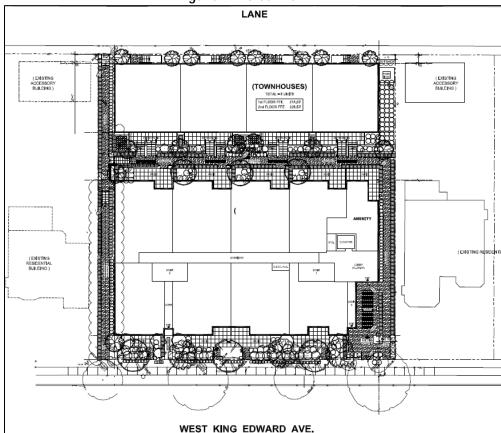


Figure 2 - Site Plan

3. Form of Development (refer to drawings in Appendix E)

Following the principles of the *Cambie Corridor Plan*, this site is within an area that anticipates four-storey residential buildings on King Edward Avenue and two-storey townhouses at the lane. The application is proposing a four-storey building and two-storey townhouses along the lane, separated by a landscaped courtyard. One of the most notable aspects of the site is the steep grade, sloping 2.66 m (8.7 ft.) from the southwest corner (street) to a low point at the northwest corner (lane).

The buildings are generally consistent with the height and form of the development guidelines outlined in the Plan. The front building is stepped back at the upper storey to enhance the character of the three-storey streetwall along King Edward Avenue. The townhouse building at the lane is reasonably proportioned to offer a pedestrian scale at the lane and a transition in building massing towards the smaller scale residential development across the lane. A condition has been included to provide two townhouse buildings by requiring a substantial break in order to further improve the massing of the building at the lane. This will improve scale, massing, and livability of units as per the Plan.

The proposed development generally conforms to the front, side and rear yard setbacks outlined in the Plan. A courtyard between two buildings provides public outdoor amenity, open space, and greenery to the new development. It generally meets the open space expectation in the Plan. The courtyard is proposed to be improved by increasing the depth of the courtyard and locating active uses adjacent to it.

Ground-oriented units have individual entrances directly from the street and the lane to facilitate the interactions with the street and the lane. The patios and the entry doors are elevated by two or three steps to provide a clearer distinction between the public and private realm.

The Urban Design Panel reviewed the project on September 21, 2016 (see Appendix D) and did not support the application. Staff have reviewed the advice provided by the Urban Design Panel and included conditions to increase the width and usable space in the courtyard, reduce the apparent building massing, and to create two separate townhouse buildings at the lane. Staff support the application subject to the design development conditions described here and included in Appendix B that will further improve and refine the building design as mentioned. The proposal will also undergo further design development during the development permit review process.

4. Housing

The *Housing and Homelessness Strategy* strives to enhance access to affordable housing and sets a number of short- and long-term rental housing targets. Rental housing provides a more affordable housing option for nearly half of Vancouver's population and contributes to a number of City initiatives intended to create diverse and sustainable communities. These rental units are targeted to moderate-income households, thereby providing options that are more affordable than home ownership.

The proposal would deliver 42 secured market rental housing units in the form of one-bedroom, two-bedroom, three-bedroom and four-bedroom units. On July 13, 2016, Council adopted the *Family Room: Housing Mix Policy in Rezoning Projects*. The policy includes new family housing requirements which increase the number of family units in rental projects from 25% to 35%, designed in accordance with the High-Density Housing for Families with Children Guidelines. This application proposes 88% family units, comprised of 24 two-bedroom units (57%), 11 three-bedroom units (26%), and 2 four-bedroom units (5%) units which exceeds the policy requirement.

All 42 units would be secured through a Housing Agreement and a Section 219 Covenant for the longer of the life of the building or 60 years. The addition of 42 new secured market rental housing units to the City's inventory of market rental housing contributes toward the near-term and long-term targets of the Housing and Homelessness Strategy (see Figure 4). Conditions related to securing the units are contained in Appendix B.

Vancouver has one of the lowest vacancy rates in Canada. In December, 2017, the vacancy rate citywide was 0.9% and in the Mount Pleasant/Renfrew Heights neighbourhood it was 0.7%. That means only seven out of every 1,000 market rental units in Mount Pleasant/Renfrew Heights were empty and available for rent. A vacancy rate of 3% is considered to be a balanced rental market.

5,000

2,139

Housing and Homelessness Strategy 2012-2021 (September 30, 2017)

TARGETS

CURRENT PROJECTS

GAP

2021

Completed

Under

Construction

Construction

Construction

Construction

2,895

1,998

7,032

2,032 Above

Target

Figure 3 - Progress Toward the Secured Market Rental Housing Targets as set in the Housing and Homelessness Strategy 2012-2021 (September 30, 2017)

5. Transportation and Parking

Secured Market

Rental Housing Units

Vehicle and bicycle parking are provided within one level of underground parking, accessed from the rear lane. The application proposes 54 vehicle parking spaces and 57 bicycle storage spaces which would be provided in accordance with the Parking By-law. Engineering Services has reviewed the application and have no objections to the proposed rezoning provided that the applicant satisfies the conditions included in Appendix B.

6. Environmental Sustainability

The *Green Buildings Policy for Rezonings* (last amended by Council on February 7, 2017) requires that residential rezoning applications satisfy either the near zero emissions buildings or low emissions green buildings condition within the policy. The new requirements are mandatory for all rezoning applications received after May 1, 2017. Applications received prior to May 1, 2017, may choose to meet this updated version of the policy or the preceding version.

This application, which was received prior to May 1, 2017, has opted to satisfy the preceding version of the *Green Buildings Policy for Rezonings*, which requires rezoning applications achieve a minimum of LEED® Gold rating, with targeted points for water efficiency and stormwater management and a 22% reduction in energy cost as compared to ASHRAE 90.1 2010, along with registration and application for certification of the project. The applicant submitted a preliminary LEED® scorecard, which generally conforms to the *Green Buildings Policy for Rezonings*, indicating that the project could attain the required LEED® points and, therefore, would be eligible for LEED® Gold rating.

The Cambie Corridor Plan also recommends a deconstruction plan for diverting demolition waste. A condition of rezoning in Appendix B requires a Recycling and Reuse Plan for Green Demolition/Deconstruction, for demolition of existing buildings on site, to recycle/reuse at least 75% of demolition waste (excluding hazardous materials).

PUBLIC INPUT

Public Notification - The City of Vancouver Rezoning Centre webpage included notification and application information as well as an online comment form. A rezoning information sign was also posted on the site. A community open house was held for this application from 5-8 pm on September 5, 2016, at Phoenix Gymnastics, 4588 Clancy Loranger Way. Staff, the applicant team, and a total of approximately 41 people attended the open house.

^{*}Unit numbers in Figure 3 exclude the units proposed at (current address), pending Council approval of this rezoning application.

Public Response and Comments - The City received a total of five responses to the application by email or comment form. Comments reflected general support for the proposal, though some concern was expressed about the proposed density and shadowing on sidewalks. There was also a desire to improve the construction materials.

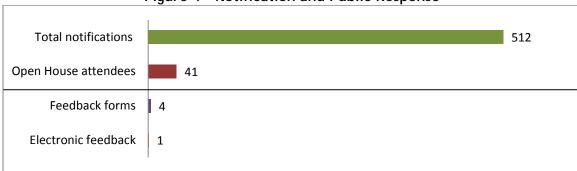


Figure 4 - Notification and Public Response

In response to the feedback received during the application review process, staff note that the application meets the intent of the *Cambie Corridor Plan* design guidelines with regard to height and density. Given the building location, no shadowing of the sidewalk on King Edward Avenue is anticipated.

PUBLIC BENEFITS

In response to City policies concerning changes in land use and density, this application addresses public benefits as follows.

Public Benefits - Required by By-law or Policy

Development Cost Levies (DCLs) - Development Cost Levies (DCLs) collected from development help pay for facilities made necessary by growth, including parks, childcare facilities, replacement housing (social/non-profit housing) and engineering infrastructure.

This site is subject to the City-wide DCL rate which is currently \$168.13 per sq. m (\$15.62 per sq. ft.). This rate is applied to the 4,311.5 sq. m (46,407 sq. ft.) of new floor area. On this basis, a DCL of approximately \$724,892 is anticipated. The applicant is not seeking a DCL waiver for this secured market rental housing project.

DCLs are payable at building permit issuance and are subject to an annual inflationary adjustment on September 30 of each year. When a DCL By-law with higher rates is introduced, a number of rezoning, development permit and building permit applications may be at various stages of the approval process. An application may qualify as an in-stream application and therefore may be exempt from DCL rate increases for a period of 12 months from the date of DCL By-law rate adjustment. If a related building permit application is not issued within the 12-month period, the rate protection expires and the new DCL rate will apply. See the City's DCL Bulletin for details on DCL rate protection.

Public Art Program - The *Public Art Policy for Rezoned Developments* requires that rezonings involving a floor area equal to or greater than 9,290 sq. m (100,000 sq. ft.) allocate a portion of their construction budgets to public art or provide cash in lieu as a condition of rezoning. As the proposed floor area is below the minimum threshold, no public art contribution will arise from this application.

Public Benefits - Offered by the Applicant

Rental Housing - The applicant has proposed that all of the 42 residential units be secured as market rental housing (non-stratified). The public benefit accruing from these units is their contribution to the City's secured market rental housing stock for the longer of the life of the building or 60 years, whichever is greater. A Housing Agreement will be registered on title to preclude the stratification and/or separate sale of individual units.

The development of secured market rental housing aligns with the City's priorities to encourage the continued building of strong, safe and inclusive communities that are sustainable, affordable and environmentally sound. Rental housing provides a more affordable housing option for nearly half of Vancouver's population and contributes to a number of City initiatives intended to sustain socially, economically and environmentally thriving communities.

Community Amenity Contributions (CACs) - Within the context of the City's *Financing Growth Policy* and the *Cambie Corridor Plan*, an offer of a Community Amenity Contribution (CAC) can be anticipated from the owner of a rezoning site. CAC offers take into consideration community needs, area deficiencies and the impact of the proposed development on City services. They typically include either the provision of on-site amenities or a cash contribution towards other public benefits.

Through December 2017, approximately \$300.7 million has been secured through approved rezonings under the *Cambie Corridor Plan*. These CACs have been allocated as per Figures 5 and 6.

On November 29, 2017, City Council approved a CAC policy amendment that exempts CACs on routine, lower density secured market rental rezoning applications that align with the *Secured Market Rental Housing Policy (2012)* and *Rental Incentive Guidelines (2017)*. Staff note that if the application was received after November 29, 2017, it would have been eligible for CAC exemption under the amended policy. However, this application was received prior to November 29, 2017 and is therefore not considered for CAC exemption under the amended policy.

The main public benefit achieved for this application is secured market rental housing. Real Estate Services staff have reviewed the applicant's development pro forma and have concluded that, after factoring in the costs associated with the provision of secured market rental housing units for the longer of the life of the building or 60 years, no further contribution towards public benefits is necessary in this instance. A public benefits summary is provided in Appendix F.

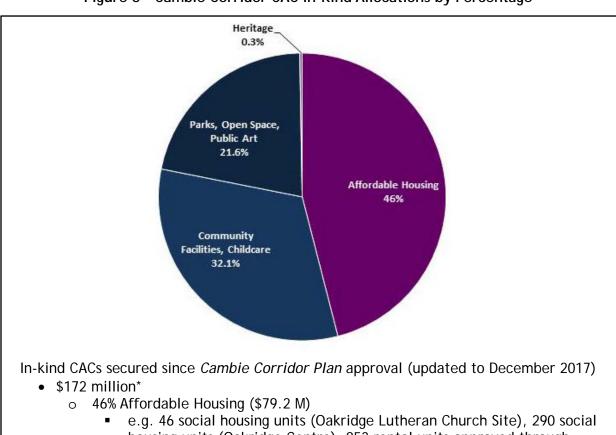


Figure 5 - Cambie Corridor CAC In-Kind Allocations by Percentage

- e.g. 46 social housing units (Oakridge Lutheran Church Site), 290 social housing units (Oakridge Centre), 853 rental units approved through rezoning (various sites)
- 32.1% Community Facilities (civic facilities, childcare) (\$55.2 M)
 - e.g. 69-space childcare facility (Oakridge Centre), 37-space childcare facility (8175 Cambie Street), 2 artist studio units (8018 Cambie Street), Marpole-Oakridge Family Place (8175 Cambie Street)
- o 21.6% Parks, open space and public art (\$37.2 M)
 - e.g. A 9-acre park (Oakridge Centre), a Bicycle Mobility Centre (8440 Cambie Marine Gateway), public art installations
- 0.3% Heritage (\$481 K)
 - e.g. Onsite heritage conservation of James House and Wong Residence

*Includes Oakridge Centre rezoning and Cambie Corridor CACs collected within the Marpole Plan boundary.

The examples provided are illustrative and do not represent a comprehensive list of all approved in-kind benefits. Totals may not be exact due to rounding.

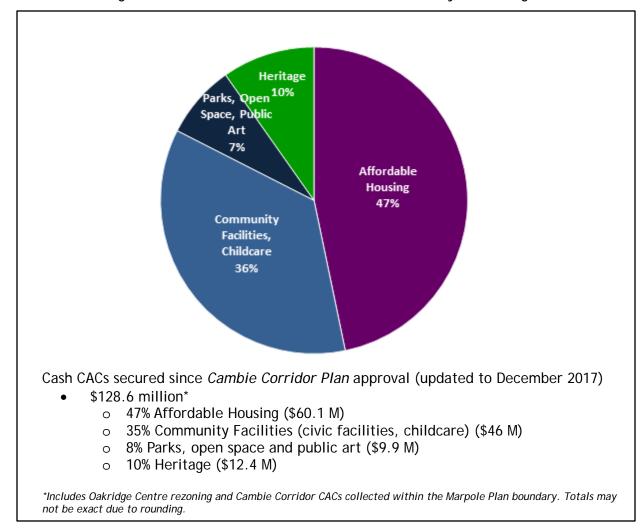


Figure 6 - Cambie Corridor CAC Cash Allocations by Percentage

FINANCIAL IMPLICATIONS

As noted in the Public Benefits section, there are no cash CACs or public art contributions associated with this rezoning. The site is within the City-wide DCL district and it is anticipated that the project will generate approximately \$724,892 in DCLs.

The 42 units of secured market rental housing, secured by a Housing Agreement for the longer of the life of the building or 60 years, will be privately owned and operated and will contribute to the City's secured rental housing stock.

CONCLUSION

Staff assessment of this rezoning application has concluded that the proposed form of development is an appropriate urban design response to the site and its context and that the application, along with the recommended conditions of approval, is consistent with the *Cambie Corridor Plan* with respect to use, density, height and form. This application includes 42 secured market rental units that will contribute to the City's secured market rental housing stock.

The General Manager of Planning, Urban Design and Sustainability recommends that the rezoning application be referred to a Public Hearing, together with a draft CD-1 By-law generally as set out in Appendix A, and that, subject to the Public Hearing, the application including the form of development as shown in the plans in Appendix E, be approved in principle, subject to the applicant fulfilling the conditions of approval in Appendix B.

431-455 West King Edward Avenue DRAFT CD-1 BY-LAW PROVISIONS

Note: A By-law will be prepared generally in accordance with the provisions listed below, subject to change and refinement prior to posting.

Zoning District Plan Amendment

1. This By-law amends the Zoning District Plan attached as Schedule D to By-law No. 3575, and amends or substitutes the boundaries and districts shown on it, according to the amendments, substitutions, explanatory legends, notations, and references shown on the plan marginally numbered Z-() attached as Schedule A to this By-law, and incorporates Schedule A into Schedule D, to the By-Law No. 3575.

[Note: Schedule A, not attached to this appendix, is a map that amends the City of Vancouver zoning map. Should the rezoning application be referred to Public Hearing, Schedule A will be included with the draft by-law that is prepared for posting.]

Uses

- 2.1 The description of the area shown within the heavy black outline on Schedule A is CD-1 ().
- 2.2 Subject to Council approval of the form of development, to all conditions, guidelines and policies adopted by Council, and to the conditions set out in this By-law or in a development permit, the only uses permitted within CD-1 (), and the only uses for which the Director of Planning or Development Permit Board will issue development permits are:
 - (a) Multiple dwelling; and
 - (b) Accessory uses customarily ancillary to the uses permitted in this section.

Conditions of use

- 3. The design and layout of at least 35% of the dwelling units must:
 - (a) be suitable for family housing;
 - (b) include two or more bedrooms; and
 - (c) comply with Council's "High-Density Housing for Families with Children Guidelines".

Floor area and density

4.1 Computation of floor space ratio must assume that the site area is 2,145.0 sq. m, being the site area at the time of the application for the rezoning evidenced by this By-law, and before any dedications.

- 4.2 The floor space ratio for all uses must not exceed 2.01.
- 4.3 Computation of floor area must include all floors, including earthen floor, above and below ground level, having a minimum ceiling height of 1.2 m, measured to the extreme outer limits of the building.
- 4.4 Computation of floor area must exclude:
 - open residential balconies or sundecks and any other appurtenances which, in the opinion of the Director of Planning, are similar to the foregoing, except that the total floor area of all such exclusions must not exceed 12% of permitted floor area;
 - (b) patios and roof gardens, provided that the Director of Planning first approves the design of sunroofs and walls;
 - (c) where floors are used for off-street parking and loading, the taking on or discharging of passengers, bicycle storage, heating and mechanical equipment, or uses, which in the opinion of the Director of Planning are similar to the foregoing, those floors or portions thereof so used, which are at or below base surface, except that the maximum exclusion for a parking space must not exceed 7.3 m in length; and
 - (d) all residential storage area above or below base surface, except that if the residential storage area above base surface exceeds 3.7 sq. m per dwelling unit, there will be no exclusion for any of the residential storage area above base surface for that unit.
- 4.5 Computation of floor area may exclude amenity areas, except that the total exclusion for amenity areas must not exceed 10% of permitted floor area.
- 4.6 The use of floor area excluded under sections 4.4 and 4.5 must not include any use other than that which justified the exclusion.

Building height

5. Building height, measured from base surface, must not exceed 14.6 m.

Horizontal angle of daylight

- 6.1 Each habitable room must have at least one window on an exterior wall of a building.
- 6.2 The location of each such exterior window must allow a plane or planes extending from the window and formed by an angle of 50 degrees, or two angles with a sum of 70 degrees, to encounter no obstruction over a distance of 24.0 m.
- 6.3 Measurement of the plane or planes referred to in section 6.2 must be horizontally from the centre of the bottom of each window.

- 6.4 The Director of Planning or Development Permit Board may relax the horizontal angle of daylight requirement, if:
 - (a) the Director of Planning or Development Permit Board first considers all of the applicable policies and guidelines adopted by Council; and
 - (b) the minimum distance of unobstructed view is not less than 3.7 m.
- 6.5 An obstruction referred to in section 6.2 does not include:
 - (a) any part of the same building including permitted projections; or
 - (b) the largest building permitted under the zoning on any site adjoining CD-1 ().
- 6.6 A habitable room referred to in section 6.1 does not include:
 - (a) a bathroom; or
 - (b) a kitchen whose floor area is the lesser of:
 - (i) 10% or less of the total floor area of the dwelling unit, or
 - (ii) 9.3 sq. m.

Acoustics

7. A development permit application for dwelling uses must include an acoustical report prepared by a licensed professional acoustical engineer demonstrating that the noise levels in those portions of the dwelling units listed below will not exceed the noise levels expressed in decibels set opposite such portions of the dwelling units. For the purposes of this section, the noise level is the A-weighted 24-hour equivalent (Leq24) sound level and will be defined simply as noise level in decibels.

Portions of dwelling units	Noise levels (Decibels)
Bedrooms	35
Living, dining, recreation rooms	40
Kitchen, bathrooms, hallways	45

431-455 West King Edward Avenue PROPOSED CONDITIONS OF APPROVAL

Note: Recommended approval conditions will be prepared generally in accordance with the draft conditions listed below, subject to change and refinement prior to finalization of the agenda for Public Hearing.

CONDITIONS OF APPROVAL OF THE FORM OF DEVELOPMENT

- (a) That the proposed form of development be approved by Council in principle, generally as prepared by Integra Architecture Inc. on behalf of CIBT Education, and stamped "Received Planning and Development Services (Rezoning Centre) July 14, 2016", provided that the Director of Planning may allow minor alterations to this form of development when approving the detailed scheme of development as outlined in (b) below.
- (b) That, prior to approval by Council of the form of development, the applicant shall obtain approval of a development application by the Director of Planning, who shall have particular regard for the following:

Urban Design

- 1. Design development to provide a substantial break (no less than 10 ft.) in the laneway townhouse building which will result in two separate buildings.
 - Note to Applicant: A single building in excess of 80 ft. is not supported in the *Cambie Corridor Plan*. This refinement will improve the scale and livability of the townhouse buildings at the lane.
- 2. Design development to improve the courtyard performance by increasing its dimension and by lowering it to be closer to natural grade and better related to units that are located along it.
 - Note to Applicant: This may be achieved by optimizing the parking structure and/or lowering the elevation of the main building. Units in the main building can be considered along the courtyard to provide amenity to the units, and to enliven the courtyard space.
- 3. Design development to re-locate the indoor amenity space to the rooftop and along with it, provide a co-located outdoor amenity space. An increase is sought on each of these spaces by providing no less than 700 sq. ft. for the indoor amenity and 1,400 sq. ft. for the outdoor amenity space.
 - Note to Applicant: A southern sun exposure must be provided to ensure viability of landscape enhancements and urban agriculture plots.
- 4. Design development to provide a children's play area at grade, in line with the *High-Density Housing for Children Guidelines*.

- 5. The proposed unit mix, including 5 one-bedroom units (12%), 24 two-bedroom units (57%), 11 three-bedroom units (26%), and 2 four-bedroom units (5%), is to be included in the Development Permit drawings.
 - Note to Applicant: Any changes in the unit mix from the rezoning application may only be varied under the discretion of the Director of Planning or Development Permit Board provided that it does not go lower than 35% of the dwelling units designed to be suitable for families with children.
- 6. Submission of a bird-friendly strategy for the design of the building is encouraged in the application for a development permit.

Note to Applicant: Refer to the Bird-Friendly Design Guidelines for examples of built features that may be applicable. For more information, see the guidelines at http://former.vancouver.ca/commsvcs/guidelines/B021.pdf.

Crime Prevention through Environmental Design (CPTED)

- 7. Design development to respond to CPTED principles, having particular regard for the following:
 - (i) Theft in the underground parking;
 - (ii) Residential break and enter:
 - (iii) Mail theft; and
 - (iv) Mischief in alcoves and vandalism, such as graffiti.

Landscape Design

- 8. Design development to improve the livability of the common courtyard by the following:
 - (i) Widen the distance between buildings to achieve a more usable space, with the common walkway to be a minimum 8 ft. wide.
 - (ii) Provide more usable common space in the area between the two townhouse buildings by replacing some of the planted area with additional seating or other common uses.
 - (iii) Provide more opportunities for informal seating and gathering by including some lawn areas, seat walls and additional benches.
 - (iv) Delete water feature and replace with a planting bed, flush with the courtyard rather than raised, for a smooth, unobstructed visual experience. This will require alterations to the parkade height in order to allow adequate depth of soil.

- (v) Orient planting beds along the walkway towards the common side, in layers with lower plants in front of taller ones.
- (vi) Relocate the children's play area, including benches for parent supervision, closer to the common courtyard, where visual access for adult supervision of children can take place. The play area should receive maximum solar orientation and should not be covered.
- 9. Design development to include the addition of minimum four significant, larger scale deciduous trees in free soil areas (on free grade) for the provision of a higher quality landscape and additional future tree canopy.

Note to Applicant: This can be accommodated in the 8 ft. setbacks along the sideyards at both ends of the common courtyard.

10. Design development to provide a more conservative tree removal strategy to enable the retention and protection of all or some of the adjacent east property trees.

Note to Applicant: A revised arborist report should recommend tree retention, based on further assessment of health and condition. Trees which are not viable will require a Letter of Consent from the property owner for removal.

- 11. Design development to fourth level common terrace through the following:
 - (i) Provision of additional planters at the terrace edge and visible from the street.
 - (ii) Provision of urban agriculture plots following the City's Urban Agriculture Guidelines for the Private Realm and including infrastructure as required, such as potting benches, hose bibs, etc. Garden plots should be wheelchair accessible.
- 12. Provision of improved sustainability by the provision of edible plants, in addition to urban agriculture plots.

Note to Applicant: Edible plants can be used as ornamentals as part of the landscape design. Shared gardening areas should reference and be designed to adhere to Council's Urban Agriculture Guidelines for the Private Realm and should provide maximum solar exposure, universal accessibility and provided with amenities such as raised beds, water for irrigation, potting bench, tool storage and composting.

- 13. Consideration to improve sustainability by the provision of an extensive green roof.
- 14. A full Landscape Plan for proposed landscape is to be submitted. The Landscape Plan should illustrate proposed plant materials (with common botanical names, plant sizes and quantities), paving, walls, railings, light

fixtures, site grading and other landscape features. Plant material should be listed in a Plant List that is clearly keyed to the Landscape Plan. The Landscape Plan should be a minimum of 1:100 or 1/8" scale and should match the architectural site plan.

- 15. Section details at a minimum scale of 1/2"=1' scale to illustrate typical proposed landscape elements including planters on structures, benches, fences, gates, arbours and trellises, and other features. Planter section details should show dimensioned rootballs to confirm depth of proposed planting on structures is deep enough to accommodate rootballs of proposed trees well into the future. The depth should exceed BCSLA standards.
- 16. Sections (1/4"=1' or 1:50) illustrating the buildings to the public realm interface facing the street, confirming a delineated private to public transition of spaces.
 - Note to Applicant: The sections should include the building façade, as well as any steps, retaining walls, guardrails, fences and planters. The location of the underground parking slab should be included in sections.
- 17. New proposed street trees should be coordinated with the Park Board and Engineering and noted "Final species, quantity and spacing to the approval of City Engineer and Park Board". Contact Eileen Curran (604-871-6131) of Engineering Streets Division regarding street tree spacing and quantity. Contact Cabot Lyford (604-257-8587) of Park Board regarding tree species.
- 18. A high-efficiency automatic irrigation system is to be provided for all planters on parkade slab and minimum of hose bibs to be provided for landscape on grade.
- 19. A Landscape Lighting Plan is to be provided for security purposes.

Note to Applicant: Lighting details can be added to the landscape drawings. All existing light poles should be shown.

Sustainability

- 20. Provision of a Recycling and Reuse Plan for Green Demolition/Deconstruction, for the demolition of existing buildings on site, to recycle/reuse at least 75% of demolition waste (excluding hazardous materials).
 - Note to Applicant: The Recycling and Reuse Plan for Green Demolition/Deconstruction should be provided at the time of development permit application.
- 21. Any new building in the development will meet the requirements of the preceding *Green Buildings Policy for Rezonings* (as amended up to January 14, 2016), including a minimum of 63 points (LEED® Gold rating), with 1 point for water efficiency and stormwater management and a 22% reduction in energy

cost as compared to ASHRAE 90.1 2010, along with registration and application for certification of the project.

Note to Applicant: A Sustainable Design Strategy must be submitted as part of the Development Permit that articulates which credits the applicant will be pursuing and how their building application, as submitted, incorporates strategies, features or technologies that will help achieve these credits. The strategy, along with the LEED checklist, must be incorporated into the drawing submission. A letter from a LEED Accredited Professional or Administrator must confirm that the proposed strategy aligns with the applicable goals of the rezoning policy. Proof of registration of the CaGBC must be provided with the application and the project registration number incorporated into the drawings. Application for Certification will be required at a subsequent stage.

22. In lieu of the requirements outlined in condition 21, the applicant may choose to meet the requirements of the *Green Buildings Policy for Rezonings* (amended February 7 2017), including all requirements for Near Zero Emissions Buildings (i.e. Passive House certified or alternate near zero emissions standard approved by the Director of Sustainability), or Low Emissions Green Buildings. The requirements for Low Emissions Green Buildings are summarized at: http://guidelines.vancouver.ca/G015.pdf.

Engineering

- 23. The owner or representative is advised to contact Engineering to acquire the project's permissible street use. Prepare a mitigation plan to minimize street use during excavation and construction (i.e. consideration to the building design or sourcing adjacent private property to construct from) and be aware that a minimum 60 days lead time for any major crane erection/removal or slab pour that requires additional street use beyond the already identified project street use permissions.
- 24. Clarify garbage storage and pick-up space. Please show containers and totters on plans for recycling and garbage needs and refer to the Engineering Garbage and Recycling Storage Facility Design Supplement for recommended dimensions and quantities of bins.
 - Note to Applicant: Pick-up operations should not rely on bins being stored on the street or lane for pick up. Bins are to be returned to storage areas immediately after emptying.
- 25. Clarify garbage pick-up operations. Please provide written confirmation that a waste hauler can access and pick up from the location shown. If this cannot be confirmed, then an on-site garbage bin staging area is to be provided adjacent the lane.
- 26. Provision of a landscape and site plan that reflects the off-site improvements sought for this rezoning. Please submit an updated plan for review.

- 27. Compliance with the Parking and Loading Design Supplement to the satisfaction of the General Manager of Engineering Services as follows:
 - (i) Provision of direct, stair-free access from the laneway to the apartment elevator core for loading.
 - Note to Applicant: Parking may not be available on King Edward Avenue in front of the site for loading due to certain street improvements.
 - (ii) Provision of an updated parking floor plan showing the full extent of the main parking ramp on the plans.
 - (iii) Provision of additional design elevations throughout the parking level, both sides of the manoeuver aisle at all break points and at all entrances to calculate the slope and crossfall and ensure City building grades are correctly met at the property lines.
 - (iv) Confirmation that the slope shown from elevation 211.88 ft. to 208.50 ft. is correct.
 - (v) Provision of a section drawing showing elevations, vertical clearances, and security gates for the parking level.
 - (vi) Label minimum clearance for parking levels on the plan and section drawings, including at overhead gate and mechanical projections.
 - Note to Applicant: Minimum 2.3 m overhead clearance is required for access and maneuvering to all disability spaces.
 - (vii) Show all overhead gates on drawing A-2.000.
 - (viii) Provision of 13'-1 ½" width and 7'-6 ½" vertical clearance for disability stall 12.
 - Note to Applicant: Consider providing two disability stalls and a shared access aisle at stall 46 and 47.
 - (ix) Provision of an updated plan showing the access route from the Class A bicycle spaces to reach the outside. The route must be 'stairs free' and confirm the use of the parking ramp or elevator, if required.
 - (x) Provide automatic door openers on the doors providing access to the bicycle room(s).
 - Note to Applicant: An interconnected water service is required for this development.

CONDITIONS OF BY-LAW ENACTMENT

(c) That, prior to enactment of the CD-1 By-law, the registered owner shall on terms and conditions satisfactory to the Director of Legal Services, the General Manager of Planning, Urban Design and Sustainability, the General Manager of Engineering Services and the Approving Officer, as necessary, and at the sole cost and expense of the owner/developer, make arrangements for the following:

Engineering Services

- 1. Consolidation of Lots 13 to 15, Block 661, District Lot 526, Plan 2913 to create a single parcel and subdivision of that site to result in the dedication of the south 0.75 m for road purposes.
 - Note to Applicant: Delete all landscaping features (metal railing, gates, gate column, etc.) from the area to be dedicated.
- 2. Provision of a shared access agreement between the subject site and the adjacent site at 467-495 West King Edward Avenue (Lots 10 to 13, Block 661, District Lot 526, Plan 2913) to secure access to the proposed underground parking.
- 3. Provision of a Services Agreement to detail the on-site and off-site works and services necessary or incidental to the servicing of the site (collectively called the "services") such that they are designed, constructed and installed at no cost to the City and all necessary street dedications and rights-of-way for the services are provided. No development permit for the site will be issued until the security for the services are provided.
 - (i) Provision of street reconstruction on King Edward Avenue adjacent to the site to generally include the following:
 - a. New curb and gutter.
 - b. A 2.5 m wide raised protected bike lane.
 - c. A 1.22 m (4 ft.) sod grass boulevard with street trees.
 - d. A 1.83 m (6 ft.) wide broom finish concrete sidewalk with saw cut joints.
 - e. Work to include adjustments of all existing infrastructure to accommodate new road geometry and street changes.

Note to Applicant: Specific public realm improvements are subject to completion and adoption of the Cambie Corridor Public Realm Plan.

(ii) Provision of street trees adjacent the site where space permits.

- (iii) Provision of upgraded street lighting and pedestrian scale lighting adjacent the site.
- (iv) Provision of adequate water service to meet fire flow demands of the project. The current application lacks the details to determine if water main upgrading is required. Please supply project details including projected fire flow demands, sprinkler demand, hydrant load, and domestic water demands to determine if water main upgrading is required. Should upgrading be necessary then arrangements to the satisfaction of the General Manager of Engineering Services and the Director of Legal Services will be required to secure payment for the upgrading. The developer is responsible for 100% of any water system upgrading that may be required.
- (v) Provision of a stormwater detention tank to maintain pre- and post-development run-off flows to meet the 1 in 5 year storm standard (the net change in capacity is to be zero). A stormwater storage covenant will be required.
 - Note to Applicant: Sewer connection is to be to the 300 mm combined sewer in the lane north of King Edward Avenue.
- 4. Provision of all utility services to be underground from the closest existing suitable service point. All electrical services to the site must be primary with all electrical plant, which include but are not limited to, junction boxes, switchgear, pad mounted transformers and kiosks (including non BC Hydro Kiosks) are to be located on private property with no reliance on public property for placement of these features. There will be no reliance on secondary voltage from the existing overhead electrical network on the street right-of-way (SRW). Any alterations to the existing overhead/underground utility network to accommodate this development will require approval by the Utilities Management Branch. The applicant may be required to show details of how the site will be provided with all services being underground.

Housing

- 5. Make arrangements to the satisfaction of the General Manager of Community Services and the Director of Legal Services to enter into a Housing Agreement securing all residential units as rental housing units pursuant to Section 3.1A of the Vancouver Development Cost Levy By-law for the longer of 60 years or the life of the building, subject to the following conditions:
 - (i) A no separate-sales covenant.
 - (ii) A no stratification covenant.
 - (iii) That none of such units will be rented for less than one month at a time.

(iv) Such other terms and conditions as the General Manager of Community Services and the Director of Legal Services may in their sole discretion require.

Note to Applicant: This condition will be secured by a Housing Agreement to be entered into the City by by-law enacted pursuant to section 565.2 of the *Vancouver Charter*.

Environmental Contamination

6. If applicable:

- (i) Submit a site profile to Environmental Services (Environmental Protection);
- (ii) As required by the Manager of Environmental Services and the Director of Legal Services in their discretion, do all things and/or enter into such agreements deemed necessary to fulfill the requirements of Section 571(B) of the Vancouver Charter; and
- (iii) If required by the Manager of Environmental Services and the Director of Legal Services in their discretion, enter into a remediation agreement for the remediation of the site and any contaminants which have migrated from the site on terms and conditions satisfactory to the Manager of Environmental Services, the General Manager of Engineering Services and the Director of Legal Services, including a Section 219 covenant that there will be no occupancy of any buildings or improvements on this site constructed pursuant to this rezoning until separate Certificates of Compliance satisfactory to the City for the on-site and off-site contamination, issued by the Ministry of Environment, have been issued to the City.

Note to Applicant: Where the Director of Legal Services deems appropriate, the preceding agreements are to be drawn, not only as personal covenants of the property owners, but also as registered charges pursuant to the Land Title Act.

The preceding agreements are to be registered in the appropriate Land Title Office, with priority over other such liens, charges and encumbrances affecting the subject site as is considered advisable by the Director of Legal Services, and otherwise to the satisfaction of the Director of Legal Services prior to enactment of the By-law and at no cost to the City.

The preceding agreements shall provide security to the City including indemnities, warranties, equitable charges, letters of credit and withholding of permits, as deemed necessary by and in a form satisfactory to the Director of Legal Services. The timing of all required payments, if any, shall be determined by the appropriate City official having responsibility for each particular agreement, who may consult other City officials and City Council.

431-455 West King Edward Avenue DRAFT CONSEQUENTIAL AMENDMENT

DRAFT AMENDMENT TO THE SUBDIVISION BY-LAW NO. 5208

A consequential amendment is required to delete Lots 13 to 15, Block 661, District Lot 526, Plan 2913; PIDs: 013-343-700, 013-343-742, and 013-343-769 respectively from the RS-1 maps forming part of Schedule A of the Subdivision By-law.

431-455 West King Edward Avenue ADDITIONAL INFORMATION

1. Urban Design Panel

The Urban Design Panel (UDP) reviewed this rezoning application on September 21, 2016.

EVALUATION: NON-SUPPORT (0-7)

Introduction: Zak Bennett, Rezoning Planner, introduced the rezoning application site approximately one block east of the King Edward Canada Line station and presently zoned RS-1. It is approximately 23,088 square feet, with 150 feet of frontage along King Edward Avenue and a site depth of 155 feet.

Across the lane, sites are also zoned RS-1 and are included in Cambie Corridor Phase 3 planning. Forms being considered include ground-oriented housing, noting that the policy planning is still underway and final direction for these sites has not been determined by Planning. The sites east and west along King Edward Avenue can be generally considered up to four storeys, with consideration for forms up to six or eight storeys approaching the intersection at Cambie Street. There are eleven approved rezonings and two current applications in the vicinity. The proposal is for a two-storey residential building and a two-storey townhouse building facing the lane with a total of 42 rental units with a height of 45 feet set over underground parking accessed through a shared ramp and knock-out panel with the neighbouring site to the west including parking for 54 cars and 63 bicycles. The proposal is being considered under the Cambie Corridor Plan, which anticipates residential four-storey buildings in this area with a suggested FSR range of 1.25-1.75. The proposal aims to deliver secured market rental housing on this site, and to rezone RS-1 to CD-1 under the Cambie Corridor Plan (CCP).

Development Planner Tim Potter introduced the form of development issues for the project, a three site assembly, located on the north side of King Edward Avenue between Cambie and Yukon Streets. The site is served by a lane and has a cross-slope of approximately 7 ft. The proposed density is 1.98 FSR and the range for the area is 1.25-1.75 FSR noting the FSR permitted in the plan is an estimate and not a limit that is based on the urban design performance. The building depth is approximately 78 ft., and the side yards are approximately 8 ft.

Advice from the Panel on this application is sought on the following:

- 1. How successful is the form of development in the context in terms of its scale and massing and their effect on open space (courtyard) and unit livability?
- 2. How successful is the interface of the proposal towards neighbouring sites at each side?
- 3. Please rate the performance of the open space in the courtyard in terms of grading, landscape design and provision of outdoor amenity space for residents.

Applicant's Introductory Comments: The applicant introduced the project as a family-oriented rental housing site with an aim to achieve 2.0 FSR to make it financially

viable. City staff are supportive of rental housing, so the setbacks are therefore smaller at 8 ft. instead of 10 ft. to accommodate the density. The Cambie Corridor Plan has prescriptive requirements that dictate the form of development criteria. The rental units are on average 1,000 sq. ft., so the size is oriented towards family housing. There is a significant grade change across the site, and the courtyard will be in shadows. The outdoor amenity space is planned to be covered and indoors as well. The amenity space is limited due to the building length. The length comes from the need to get to 2.0 FSR. The courtyard is north facing in shadow most of the time. There is a generous entry proposed.

The landscape proposed along the King Edward Avenue façade has deep patios with private access to the ground floor units separated from the street with transparent picket-like fencing, hedges and small trees. The frontage is intended to be animated and livable. Because the entrance is recessed, the intention is to build a welcoming terrace with covered bike parking and benches underneath as well as a gathering space to make it comfortable. The pathways along the sides of the building are intentionally high in order to approach the ground level units on one side. The townhouse building has a good separation from the lane by providing raised entries. The amenity space will be increased and spill out into the common courtyard. There is also a tot sized playground and a seating area planned for the courtyard. The detailing of the paving materials is intended to be lively, bright, and shiny. Sustainability wise, the orientation of the building is good for energy conservation, with shading on the south side and a low window to wall ratio.

Panel's Consensus on Key Aspects Needing Improvement:

- The buildings and design strategy is overpowering the site. It appears to be too much density, and needs to be scaled back;
- The massing and overhangs further contribute to the crowding of the site;
- The brick element on the King Edward Avenue face was seen by the panel as confusing, noting that it appears to be an entrance, but it is not;
- The courtyard is too tight, constrained, and dark, leaving no room for gathering and play.

Related Commentary: The panel commended the project for creating more rental housing. However, the panel overall thought the proposed density is excessive and needs to be reduced. Stepping the building will improve the performance. One panel member noted that the façade was well done on the north to south orientation.

The interface should have a different stepping strategy (to properly fit on the site), it is too tight and there are concerns that glazing could create interface problems with adjacent building. One panel member recommended changing the 8 ft. setback and shifting it towards King Edward Avenue because it would move it south and help with the daylight impacts to the courtyard. Panel members noted three bathrooms and additional media rooms in some of the units were an inefficient use of space and did not warrant the extra density proposed. Another panel member mentioned the depth of the floorplate was excessive for the main building, and a few panel members mentioned the architectural overhang and balconies are unnecessary on the north side.

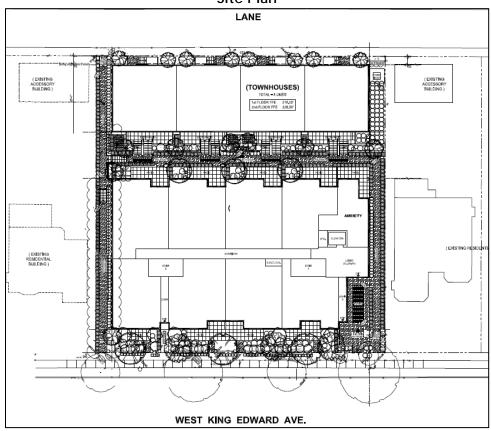
The courtyard in the current scheme is not a courtyard but merely a circulation space according to one panel member. Another panel member recommended the applicant reconsider the spaces as actual townhouses and create better access to the courtyard.

Overall, the current design needs to be revised to make more space for open space and landscaping.

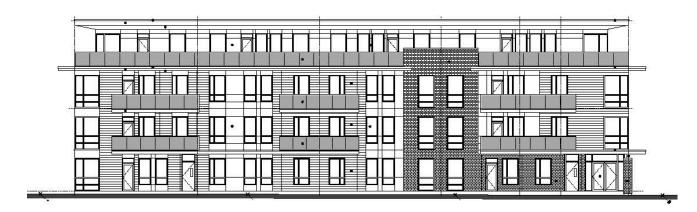
Applicant's Response: The applicant thanked the panel and will take the comments into consideration.

431-455 West King Edward Avenue FORM OF DEVELOPMENT

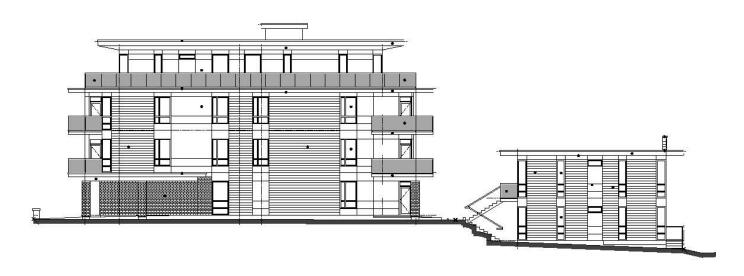
Site Plan



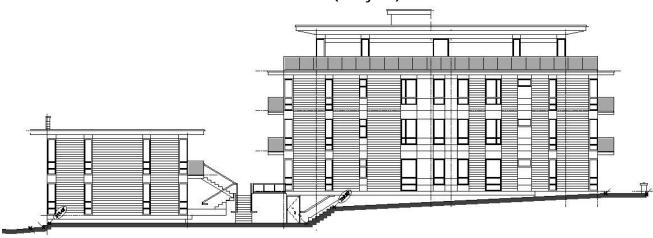
South Elevation (West King Edward Avenue)



East Elevation (sideyard)



West Elevation (sideyard)



North Elevation - Townhouses (lane)





Perspective (aerial from northwest)



431-455 West King Edward Avenue PUBLIC BENEFITS SUMMARY

Project Summary:

Four-storey residential building containing 42 secured market rental housing units.

Public Benefit Summary:

The proposal would provide 42 dwelling units secured as market rental housing for the life of the building or 60 years, whichever is longer.

	Current Zoning	Proposed Zoning
Zoning District	RS-1	CD-1
FSR (site area = 2,145.0 sq. m / 23,088 sq. ft.)	0.70	2.01
Floor Area (sq. m)	1,501.5	4,311.5
Land Use	One-Family Dwelling	Multiple Dwelling

	Public Benefit Statistics	Value if built under Current Zoning (\$)	Value if built under Proposed Zoning (\$)
*p	DCL (City-wide)	58,667	724,892
Required*	Public Art		
Red	20% Social Housing		
У	Childcare Facilities		
Offered (Community Amenity Contribution)	Cultural Facilities		
	Green Transportation/Public Realm		
	Heritage Conservation Reserve]	
	Affordable Housing		**
	Parks and Public Spaces		
	Social/Community Facilities]	
	Unallocated		
	Other]	
	TOTAL VALUE OF PUBLIC BENEFITS	58,667	724,892

^{**}Other Benefits (non-quantified components):

42 units of rental housing secured for the longer of the life of the building or 60 years.

^{*} DCLs, Public Art and Social Housing may have exemptions and/or minimum thresholds for qualification. For the City-Wide DCL, revenues are allocated into the following public benefit categories: Replacement Housing (36%); Transportation (25%), Parks (18%); Childcare (13%); and Utilities (8%).

431-455 West King Edward Avenue APPLICANT, PROPERTY AND DEVELOPMENT PROPOSAL INFORMATION

Applicant and Property Information

Address	431-455 West King Edward Avenue	
Legal Descriptions	Lots 13 to 15, Block 661, District Lot 526, Plan 2913; PIDs: 013-343-700, 013-343-742, and 013-343-769 respectively	
Developer	CIBT Education	
Architect	Integra Architecture Inc.	
Property Owners	1022003 B.C. Ltd.	

Development Statistics

	Permitted Under Existing Zoning	Proposed
ZONING	RS-1	CD-1
SITE AREA	2,145.0 sq. m (23,088 sq. ft.)	2,145.0 sq. m (23,088 sq. ft.)
LAND USE	One-Family Dwelling	Multiple Dwelling
MAXIMUM FSR	0.70	2.01
MAXIMUM HEIGHT	10.7 m (35 ft.)	14.6 m (48 ft.)
FLOOR AREA	1,501.5 sq. m (16,162 sq. ft.)	4,311.5 sq. m (46,407 sq. ft.)
PARKING, LOADING AND BICYCLE SPACES	As per Parking By-law	As per Parking By-law