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Urban Development Institute
717 Pender Street
Vancouver, B.C.
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City of Vancouver
Planning Department
453 West 12th Avenue
Vancouver, BC V5Y 1V4

Att: Heike Roth

**Re: INDUSTRY COMMENTS ON PROPOSED CHANGES TO ZONING AND
DEVELOPMENT BYLAW SUPPORTING ENHANCED ACCESSIBILITY
PROVISIONS**

Dear Heike,

The real estate development industry greatly appreciates the opportunity to provide input regarding the City's proposal to amend the Zoning and Development Bylaw governing accessibility. The Urban Development Institute is committed to ensuring that affordable, practical and sustainable housing is available to all British Columbians.

Background

Over the last decade, the City has sought to enhance accessibility for residential uses, beyond the requirements of the VBBL. The goal has been to foster independent access to and use of housing by a wider range of people than current housing design permits.

Three options involving a FSR exclusion for meeting the visitable washroom requirement were discussed. Two of these options involve "borrowing" FSR from the existing residential storage space exclusion. These options are discussed below.

Option 1 - Decrease the residential storage space exclusion to 2.7m² (from 3.7m²) and add a new 1.0m² exclusion for the provision of the visitable washroom.

Option 2 - Provide flexibility in the use of the existing 3.7m² residential storage space exclusion, to allow for excluding up to 1.0m² for the provision of one visitable washroom. In this option, the total exclusion would remain unchanged at 3.7m², yet applicants would have the choice to make their storage space somewhat smaller and use the residual to help meet the visitable washroom requirement, as needed.

Option 3 - Increase the allowable FSR by 1.0m²/unit.

The Institute is pleased to submit the following comments regarding the proposed Bylaw amendment options:

- The city is selectively referencing the additional area required within the unit to accommodate a larger, accessible washroom. This additional area is estimated at 3-9 square feet (0.3 m² – 0.8 m²). No reference is made to the additional area that is taken out of living space to provide for the clear space that must be provided on each side of the entry door to each dwelling unit 450 mm (18 inches). If the door is at the end of the corridor the entire length of the corridor must be widened by 18 inches. If the entry corridor is 6 feet deep the entry corridor to each suite would be increased by 9 square feet (0.84 m²). This area would have to be taken out of the living space of the unit (e.g. the living room, dining room, bedroom or kitchen) in addition to the living area lost to the bathroom.
- By adding the larger washroom requirements and the extended clear space adjacent to the suite entry door, the floor area of the effective living space of the unit is decreased by at least 12 – 18 square ft (1.14 m² – 1.64 m²), not the 1.0 m² exclusion as discussed in the Draft paper. Particularly in small-suite buildings this is a significant reduction in living area within a suite.

The exclusion of 1.0 m² is too small. The second requirement has been ignored.

- ***Option 3 is the most equitable and provides the most reasonable consideration for this new requirement.*** The 1.0 m² may not adequately compensate for the lost area of living space, particularly in smaller suites, but is more palatable than either Options 1 or 2.

The impact of additional bulk would be unnoticeable to the neighbourhood. For example, in a 185 unit 24-storey building, an additional FSR of 185 m² would be added. This bulk would be approximately 7.70 m² per floor (82.9 sq ft) and would equate to less than a six-inch increase to the length and width of the building.

- Option 1 is the least appropriate option. The residential storage space is a separate city policy and was established for independent reasons. Trading off on the 2 benefits does not make sense. Both policies (Residential storage) and enhanced Accessibility should stand on their own merits and the appropriate consideration be provided for each issue.
- On page 6 the draft paper states that the “residential storage” exclusion has been abused. This is not true. Residential storage is provided completely in accordance with city policy and has achieved their objective of providing adequate residential storage space within the unit, not underground in the parkade. Because developers have creatively chosen to “re-merchandise” this space in their sales displays, showing options for this storage space, does not in any way not allow this space be used for storage.
- ***Residents should not have to reduce their residential storage space in order to meet the required enhanced Accessibility requirements.*** This should not be made a mandatory tradeoff for developers and ultimately residents. There should be some flexibility for variations and options for the suite plans for residents. With the reduced area for the residential storage it would be difficult to meet the minimum storage space dimension requirements of 1.2 m (3.9 ft).
- Option 2 is preferred to Option 1 but is not equitable for the above-mentioned reasons. Trade-offs between two city policies with different objectives has inconsistent and poorly

linked rationale. The city may be discouraged that some residential storage space is being “merchandised” for other uses, but this should not negate the premise for providing the FSR exclusion for the provision of the 40 square feet of in-suite storage. Many people will still use this area for storage, as was the intent of the policy.

- The calculation for Option 2 can be simplified to exclude up to 1.0 m2 from FSR for the inclusion of the accessible washroom (as long as the total SF exclusion for the washroom and the storage do not exceed 40 SF). The exclusion for the storage can be up to 3.7 m2 based on what is actually provided. The 3.7 m2 maximum exclusion from FSR is maintained.

This leaves the developer with options to design the suite, and can reduce the storage area only if deemed necessary based on the floor plan.

Calculation examples:

<u>Storage Provided</u>		<u>Area Excluded from FSR</u>
25 SF +	Accessible Washroom=	35 SF
30 SF +	Accessible Washroom =	40 SF
35 SF +	Accessible Washroom =	40 SF
40 SF +	Accessible Washroom =	40 SF

The two city policies, to provide in-suite residential storage and an accessible washroom, are both optimized.

- ***Option 3 still seems the most consistent, reasonable, fair, simple and appropriate way to amend the zoning bylaw and compensate the developer for providing more accessible buildings. Options 1 and 2 will add to the ultimate cost of housing. Option 3 helps to keep the cost of new housing down, as there is at least some compensation provided for the additional costs that will be incurred to make buildings more accessible. Even adding 1.0 m2 to the FSR is not really adequate compensation for the actual costs of providing all the additional accessibility requirements.***

The Institute looks forward to further consultation with the City on this issue.

Sincerely,



Vancouver/UDI Liaison Committee

- c. c. Mr. John Robertson, Chief Building Official
Ms. Jacquie Forbes-Roberts, General Manager, CSG
Mr. William M. Johnston, Code Development Engineer