

## Ludwig, Nicole

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Tuesday, June 21, 2016 11:47 AM  
**To:** Public Hearing  
**Subject:** FW: Apartment buildings proposed on Commercial Drive and east 18th Avenue.

**Categories:** Green Category

**From:** Val Kalk s.22(1) Personal and Confidential  
**Sent:** Tuesday, June 21, 2016 11:32 AM  
**To:** Correspondence Group, City Clerk's Office  
**Subject:** Fwd: Apartment buildings proposed on Commercial Drive and east 18th Avenue.

----- Forwarded message -----

**From:** "Val Kalk" s.22(1) Personal and Confidential  
**Date:** Jun 21, 2016 11:26 AM  
**Subject:** Apartment buildings proposed on Commercial Drive and east 18th Avenue.  
**To:** <[gregor.robertson@vancouver.ca](mailto:gregor.robertson@vancouver.ca)>  
**Cc:**

Dear Mayor and Councillors,

My name is Val Kalk have been living in the neighbourhood at s.22(1) Personal and Confidential for the past 25 years. My husband Sam Kwan and I love our community and are concerned about the recent developments in the neighborhood.

I have a number of concerns about this proposed development at 18th and Commercial.

There is a concentration of what I consider to be UNAFFORDABLE rental housing projects within a few blocks already, with No additional amenities.

The development doesn't fit into the character of the neighborhood or follow City Policies.

The 6 story building is too tall and the density excessive.

There isn't enough parking stalls which will create parking problems in the area. And the ramp off 18th will create further traffic problems.

In addition,, the loss of 40 trees at this site will impact the feel and health of the neighborhood and Vancouver's need for green spaces.

Sadly an ancient steam bed will be buried.

Cressey is now proposing to build more UNAFORDABLE rental housing without any contribution to the community

I feel strongly that this development as it stands will negatively impact our neighbourhood and needs future consideration.

It would be great to have a development that is beautiful, one that we all could be proud of.

Thank you for this opportunity to voice my concerns.

Sincerely  
Val Kalk

## Ludwig, Nicole

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Tuesday, June 21, 2016 10:17 AM  
**To:** Public Hearing  
**Subject:** FW: June 23 2016 Public Hearing, 3365 Commercial Drive and 1695 to 1775 East 18th Avenue  
**Attachments:** RS-2 and RS-7 Original Report Neighbourhood Character.pdf  
**Categories:** Green Category

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**From:** Grace MacKenzie **s.22(1) Personal and Confidential**  
**Sent:** Tuesday, June 21, 2016 12:35 AM  
**To:** Correspondence Group, City Clerk's Office; Robertson, Gregor; Carr, Adriane; Reimer, Andrea; Affleck, George; Ball, Elizabeth; Deal, Heather; De Genova, Melissa; Jang, Kerry; Louie, Raymond; Meggs, Geoff; Stevenson, Tim  
**Subject:** June 23 2016 Public Hearing, 3365 Commercial Drive and 1695 to 1775 East 18th Avenue

Mayor and Council

Our family owns a house on East 18th to the west of this proposal. We've been there for 75 years.

Cressey has harassed us several times to underpin our property and put a construction crane over our house while they build and we do not want that to happen. This development will overlook our back bedroom windows and our private back yard. This is an unfriendly development. How will the City protect us from this proposal?

I ask Council to oppose this application at 3365 Commercial Drive and 1695 to 1775 East 18th Avenue for the following reasons:

The building forms in this proposal are not consistent with the directions for built form according to City policies. The project does not fit the character of this RS zoned neighbourhood. Creating an eighty-five thousand square foot development in a single family RS zone greatly changes the character of the neighbourhood.

The October 2, 2012 Council Report created the IRP, and says that housing forms identified in the Community Visions will inform this work. The form of new development in RS zones is to be ground-oriented according to the Kensington-Cedar Cottage Community Vision.

I have listed below my concerns with this project and how it does not following City Policies.

1. The staff Policy Report of April 11, 2016 for this proposal relies on the RS-2 and RS-7 Infill and Multiple Dwelling Guidelines. These guidelines say that maintaining and enhancing the physical and social character of these older residential areas is considered an important goal. The intent of these guidelines is to build ground-oriented housing of 35 feet or 2 ½ storeys with a density not to exceed 0.75 FSR. This report is attached.

The Council report which created these guidelines say:

- . build small-scale apartment and townhouses, the height requirement for all development in RS-2 will be the lesser of 35 feet or 2 ½ storeys;
- . the floor space ratio shall not exceed 0.75 FSR;

. large, long parcels could be developed with small-scale apartments, townhouses and infill development within the range of densities in RS-2;  
. the form of apartment envisioned would be similar in appearance to a multiple conversion dwelling and provide ground-oriented family accommodations.

2. The City website says the Interim Rezoning Policy and the Rental Incentive Guidelines relate to the IRP initiative. In the Rental Incentive Guidelines on page 5, there's a chart that recommends the zones that can be considered for additional density. This chart shows the current zoning and what additional densities those zones may receive. RS zones are not mentioned on this chart, so this proposal should not receive additional density.

According to the Rental Incentive Guidelines, RS zones are not recommended to receive additional density, if this project is approved this will set a precedent City-wide for new projects in RS zones to receive additional density under the IRP.

3. The Kensington-Cedar Cottage Community Vision has a Rezoning Policy. According to this rezoning Policy this proposal must have an Area Planning Process before this rezoning is allowed. The Vision says:

Area planning is not required for individual rezonings:

? If the rezoning project contains a building already on the Heritage Register. AND

? If the rezoning is for non-market affordable housing.

See page 37 of the Vision, it says the following:

"Non-market Housing

New housing that is built in the normal development market 'market housing' is usually not affordable to lower income households, regardless of the type of housing it is. The City assists in providing non-market housing units for lower income households in a number of ways:

- leasing city land to non-profit housing sponsors, who build housing funded by the BC government
- using housing agreements with developers, where they include lower cost or guaranteed rental suites in their market projects, in return for additional density - using funds from Development Cost Levies to assist in buying land or paying for housing units directly.

These projects sometimes require an individual site-specific rezoning, with community consultation taking place in each case. (See Rezoning Policy on page 49.)"

Nothing in this rezoning application is on the Heritage Register. The Vancouver Heritage Commission did not support this application at their May 4, 2015 meeting.

And, this proposal is market rental, not non-market.

Therefore:

Area Planning is required for the rezonings in this proposal. The Vision Rezoning Policy says:

a) areas that have older buildings should be studied first before promoting the opportunity to be included on the Vancouver Heritage Register.

b) individual rezonings will not be considered without additional area planning with community consultation. These has not been done for this project.

4. The IRP policy was created out of the Mayor's Task Force on Affordable Housing. The Task Force chose to

separate RS zones from all the other zones.

The Task Force says to achieve density in RS zones build smaller units for sale and rent that can be sensitively infilled within existing neighbourhoods without any increase in FSR. These might include a triplex, a duplex combined with a coach house, or three smaller houses on a lot. By combining lots, small attractive infill developments could be developed within established neighbourhoods. There can be a gentle increase in FSR from 0.6 to approximately 0.73.

5. The front setbacks, from the sidewalk to the front wall of any new development, should be in line with the setbacks of existing housing on East 18th. That means the setbacks should be in line with existing buildings on East 18th all the way to the corner of East 18th and Commercial Drive and not have a jutting out of the building to the south as is in this proposal.

6. October 3, 2012 Council said that, the maximum number of affordable housing rezoning applications be 20, and limited to 2 within ten blocks on any arterial, to maintain neighbourhood character. This project makes 3 affordable housing projects within 10 blocks all receiving waivers on the DCL's and parking. Council's intention with affordable housing was to keep the neighbourhood character.

The character of the neighbourhood will be changed because this project takes away an oasis of nature which provides the people of the neighbourhood joy and peace. It cuts down 40 trees and robs the birds and animals of their homes - it buries an ancient stream - it sells the oasis of nature on the virgin City lot for a parking ramp - it takes this natural place away from the generations to come. Keep this lot as City land for generations to come to enjoy. The staff report says this is simply surplus City land. This is not true, this land is already developed; it's developed with trees, birds and animals. LEAVE IT ALONE!

Creating an eighty-five thousand square foot development in a single family RS zone greatly changes the character of the neighbourhood. How can you possibly allow this to happen when the policies don't allow it?

7. The proposal denies the community infrastructure funding (childcare, community center) because it doesn't pay DCL. It adds more density with no contribution to infrastructure for the residents. It encourages parking on the street which could deny current residents the opportunity to park in front of their home. Many houses in this older area don't have back lanes for a garage or the ability to park in their front yard so their only option is to park on the street.

Thank you for considering my input.

Regards  
Grace MacKenzie

CITY OF VANCOUVER  
MEMORANDUM

*From:* CITY CLERK

*Date:* 21 December 83

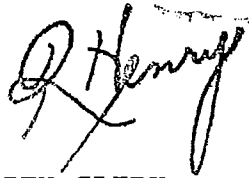
*To:* DIRECTOR OF PLANNING  
PUBLIC HEARING CLERK

*Refer File:* 5302

*Subject:* APARTMENTS AND TOWNHOUSES IN  
RS-2 ZONED AREAS

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Please be advised that Vancouver City Council at its meeting on Tuesday, December 20, 1983, approved the recommendations of the Standing Committee of Council on Planning and Development as contained in the attached clause of its report dated December 8, 1983, with regard to the above matter.



CITY CLERK  
*hc*

MCross:lc  
Att.

RECOMMENDATION

4. Apartments and Townhouses in  
RS-2 Zoned Areas

The Committee considered a City Manager's report dated November 30, 1983 (on file in the City Clerk's office), in which the Director of Planning reviews the existing Council policies for apartments and townhouses in the RS-2 areas and proposes new policies, guidelines, and by-law amendments to govern these forms of development and proposes that 'infill development' be permitted as a conditional use in RS-2.

Mr. Craig Rowland, Area Planning, advised that the RS-2 areas located in Kitsilano, Riley Park, Cedar Cottage, Grandview-Woodland and Heather Park permit one-family dwellings as an outright approval use. Conditional approved residential uses in the RS-2 Schedule include: two-family dwelling on a site not less than 7,200 square feet, multiple conversion dwelling, boarding or rooming house, apartment building and townhouses.

While apartment building and townhouses are listed as conditional uses in the RS-2 Schedule, Council has adopted policies which prohibit apartment and townhouse development in that zone. The need to review the moratorium has become apparent with increasing development interest related to several large, deep, underutilized parcels in some of the RS-2 areas. The Planning Department has recently received several enquiries regarding these properties. Since the moratorium was established, two townhouse projects, one at 17th Avenue and Quebec Street and one at 27th Avenue and Quebec Street, have been approved by the Director of Planning following Council endorsement. While approval of these projects did not constitute a formal removal of the moratorium, it did highlight the need to reassess the policy.

Of the six policy directions recently approved by Council to guide future planning of the inner-city conversion areas, the following are applicable to the RS-2 areas:

- (a) Conserve the inner-city conversion areas as areas of intermediate density to provide an alternative to apartment or single-family areas, and to maintain a variety of affordable, ground-oriented housing;
- (b) New development should achieve a significant net increase in the number of dwelling units, provided that it is small-scale and respects the character and diversity of existing development;
- (c) Lower density conversion areas (RS-2 and RS-1A) should be included in the review of areas for increasing housing supply proposed in Coreplan.'

In reviewing the appropriateness of apartment and townhouse development in the RS-2 areas, it is important to note that the lands so zoned have different characteristics in each area, such as the variety of lot sizes and subdivision patterns.

The standard and substandard parcels in the RS-2 areas are not generally suitable for apartment or townhouse development because they presently provide sound affordable housing at good densities. While the majority of parcels in the RS-2 areas are standard in size (4,000 square feet) several unusually large, deep parcels exist, particularly in the Riley Park and Cedar Cottage areas. These parcels range in size from 7,500 to 20,500 square feet. These large lots are generally underutilized.

It would be desirable to allow these large parcels, land-locked parcels, and parcels containing non-conforming uses to develop with small-scale apartments or townhouses to redevelop at densities common in the RS-2 areas and allow building designs which are complementary to neighbouring development and which effectively utilize the deep parcels. In some cases, 'infill development' would be an appropriate alternative form of development on these parcels. Buildings which are attractive or provide affordable accommodation could then be retained and infill in the form of a one-family or two-family dwellings, apartments or townhouses could be developed on the same parcel.

Allowing small-scale apartments, townhouses and infill development only in these special circumstances, while not encouraging them in other situations, is consistent with the recently approved inner-City conversion areas policies to allow suitably designed small-scaled apartments, townhouses, and infill developments. In instances where they are desirable in the RS-2 areas, the following actions are proposed:

- (a) lift the moratorium on townhouse development;
- (b) adopt guidelines to describe sites suitable for apartment, townhouse or infill developments and to encourage development which is compatible with the neighbourhoods;
- (c) amend the Zoning and Development By-law for clarity and to permit infill development.

To guide potential development permit applicants and assist the Director of Planning when considering apartments, townhouses, and infill developments as conditional uses, it is proposed that the following guidelines be adopted:

1. Apartment, townhouse and infill development proposals will only be considered on sites which consist of:
  - (a) one single parcel, on record in the Land Title Office for Vancouver prior to (date of approval), which has an area not less than 10,000 square feet;
  - (b) a site assembly comprising a maximum of two contiguous parcels, on record in the Land Title Office for Vancouver prior to (date of approval), where each parcel has a depth greater than 160 feet or an area greater than 7,200 square feet;
  - (c) a site assembly comprising more than two contiguous parcels where it can be satisfactorily demonstrated that such an assembly would improve an irregular subdivision situation;
  - (d) a site developed with non-conforming uses.
2. No assemblies or individual parcel developments should 'lock in' the apartment, townhouse or infill development potential of an abutting large or deep lot.
3. The project design should reflect the character of the streetscape, including for example, roof shapes, exterior materials, and design details of nearby housing. The design should be neighbourly and compatible with the character of adjacent uses with respect to noise, privacy, neighbour's windows, and sunlight penetration. The design should also complement existing topography, landscape, and elements such as walls and fences.

- 4. Development Permit Applications should include, in addition to the items in Section 4 of the Zoning and Development By-law:
  - (a) a site plan which locates buildings on abutting parcels including their windows, doors, and outdoor living spaces;
  - (b) a landscape plan which indicates major trees to be retained or removed, the species, number and sizes of new plant materials, paving materials, walls, fences, arbors and trellises;
  - (c) a drawing showing the view of the proposed development and the developments on the two abutting parcels as seen from the street on which the proposal fronts.

With respect to the last guideline, Mr. F. Bowers, City Manager, advised that the Director of Permits and Licenses indicates this may lengthen the development permit processing time to some degree.

The Committee

RECOMMENDED

- A. THAT Council lift the moratorium on townhouses in RS-2 and adopt the site and development guidelines contained above. The guidelines would be applicable to Infill Development only after Council approves the necessary amendments to the Zoning and Development By-law.
- B. THAT Council instruct the Director of Planning to make application to amend the RS-2 Schedules of the Zoning and Development By-law in accordance with the proposed amendments generally listed in the attached appendix and that this application be referred directly to a Public Hearing.



Proposed Amendments to the RS-2 District Schedule

- 3.2.A - delete "Apartment Building, subject to the RM-1 District Schedule regulations."  
 - add "Apartment Building"
- 3.2.1 - add "Infill Development"
- 3.2.T - delete "Townhouses, subject to the RM-1 District Schedule regulations."  
 - add "Townhouses."
- 4.1.1 - add "The minimum site area for an apartment building, infill development or townhouses shall be 10,000 square feet."
- 4.5.3 - add "For an apartment building, infill development or townhouses, a side yard with a minimum width of 7 feet shall be provided on each side of the principal building(s), but the minimum width shall be increased so that the outer walls of the building are contained within a 135 degree angle extended horizontally and measured inwardly from any and all points on the side property lines."
- 4.7.2 - add "For an apartment building, infill development or townhouses, the floor space ratio shall not exceed 0.75."
- 4.8.4 - add "For an apartment building, infill development or townhouses, the maximum site coverage of the site by surface parking, accessory buildings, manoeuvring aisles, driveways, loading areas, other vehicular facilities and all principal buildings shall be 40 percent where no principal building exceeds 35 feet or 2 1/2 storeys in height, or 55 percent where no principal building exceeds 20 feet or one storey plus a cellar in height."
- 4.8.5 - add "For an apartment building, infill development or townhouses, in the case of a sloping site where a structure is located in or beneath a yard, the structure shall be excluded from the site coverage calculation provided that it does not, except for required earth cover, permitted fences and similar items, project above the average elevation of the portions of the streets, lanes, or sites located adjacent to such structure, and does not, in any event, project more than 3 feet above the actual elevation of adjoining streets, lanes and sites."
- 4.10 - add "Horizontal Angle of Daylight for Apartment Buildings, Infill Development and Townhouses"
- 4.10.1 - add "Where a habitable room has a window in any interior side yard, any window facing the side property line shall be located at least 10 feet from that property line."
- 4.10.2 - add "All residential buildings shall be sited so that a plane formed by an angle of 50 degrees, or two angles with a sum of 70 degrees, extended horizontally from the midpoint of every window referred to in section 4.10.1 and measured at sill level, shall be unobstructed over a distance of 80 feet."

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The need to review the moratorium has become apparent with increasing development interest related to several large, deep, underutilized parcels in some of the RS-2 area. The Planning Department has recently received several enquiries regarding these properties. Since the moratorium was established, two townhouse projects, one at 17th Avenue and Quebec Street and one at 27th Avenue and Quebec Street, have been approved by the Director of Planning following Council endorsement. While approval of these projects did not constitute a formal removal of the moratorium, it did highlight the need to reassess the policy.

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- 4.10.3 - add "For the purpose of section 4.10.2 the following shall be considered as obstructions:
  - (a) the theoretically equivalent buildings located on any adjoining sites, in any R district in a corresponding position by rotating the plot plan of the proposed building 180 degrees about a horizontal axis located on the property lines of the proposed site;
  - (b) part of the same building, including permitted projections;
  - (c) the maximum size building permitted under the appropriate C or M District Schedule if the site adjoins a C or M site."
  
- 4.10.4 - add "Where a window is greater in area than the minimum required under the Building By-Law, the above conditions may be tested against the least restrictive portion of the window equal in area to the required minimum."
  
- 4.10.5 - add "For the purpose of section 4.10.1, a bathroom or kitchen shall not be considered as a habitable room unless its area is greater than 10 percent of the total floor area of its dwelling unit, or 70 square feet, whichever is the greater."
  
- 5.2 - add "Relaxation of Regulations  
 The Development Permit Board or the Director of Planning, as the case may be, may relax the yard provisions of Sections 4.5.3 of this Schedule in the case of infill development provided that:
  - (a) he first has regard to applicable guidelines or policies which City Council may, from time to time, determine; and
  - (b) the relaxation facilitates an overall better relationship of the infill development with the existing buildings on the development site and abutting sites."

MANAGER'S REPORT

DATE: November 30, 1983

TO: Standing Committee of Council  
On Planning and Development

SUBJECT: Apartments and Townhouses in  
RS-2 Zoned Areas

CLASSIFICATION: RECOMMENDATION

The Director of Planning reports as follows:

'BACKGROUND AND PURPOSE

A study of the inner-city conversion areas was authorized by Council in November 1981 to include general policy directions as well as analysis of specific local areas including the RS-2 zoned areas. Council received a general update on progress in October 1982, and in June 1983 approved six policy directions to guide future planning of the inner-city conversion areas. The future role of these areas can be summarized as conservation and selective densification, providing alternatives to apartment and single-family areas within the city. Using the six policy directions as a framework, studies on specific topics are presently being completed, including the subject of this report: policy for apartments and townhouses in the RS-2 zoned areas.

The purpose of this report is to review existing Council policies for apartments and townhouses in the RS-2 areas and to propose new policies, guidelines, and by-law amendments to govern these forms of development. Additionally, this report proposes that 'infill development' be permitted as a conditional use in RS-2.

INTRODUCTION

The RS-2 areas are located in Kitsilano, Riley Park, Cedar Cottage, Grandview-Woodland, and Heather Park. These areas are mapped in Appendices 1-6.

The RS-2 District Schedule permits one-family dwellings as an outright approval use. The RS-2 Schedule also lists a range of conditional approval residential uses: two-family dwelling on a site not less than 7,200 square feet, multiple conversion dwelling, boarding or rooming house, apartment building and townhouses. While apartment building and townhouses are listed as conditional uses in the RS-2 Schedule, Council has adopted policies which prohibit apartment and townhouse development in that zone. These policies are outlined in the next section of this report.

CURRENT RS-2 POLICIES

In 1970, the Zoning and Development By-law was amended to list apartment building and townhouses as conditional uses in the RS-2 District Schedule subject to the RM-1 District Schedule regulations. In 1976, Council placed a moratorium on townhouse development in the RS-2 areas pending a review of low-density multiple housing in the RS-1 areas. The moratorium was also considered to apply to apartments. The moratorium was not lifted subsequent to the RS-1 review and no further analysis of RS-2 was undertaken.

The need to review the moratorium has become apparent with increasing development interest related to several large, deep, underutilized parcels in some of the RS-2 areas. The Planning Department has recently received several enquiries regarding these properties. Since the moratorium was established, two townhouse projects, one at 17th Avenue and Quebec Street and one at 27th Avenue and Quebec Street, have been approved by the Director of Planning following Council endorsement. While approval of these projects did not constitute a formal removal of the moratorium, it did highlight the need to reassess the policy.

In addition to this moratorium policy which is applicable to all RS-2 areas, Council adopted two area-specific policies:

Point Grey Road Waterfront Plan (December 7, 1976): Apartments and townhouses shall not be permitted on the north side of Point Grey Road (also applies to RT-2 area on north side of Point Grey Road);

Grandview-Woodland Area Policy Plan - Part 1 (June 12, 1979): Prepare a comprehensive development plan for the Turner-Ferndale area which excludes townhouse development.

INNER-CITY CONVERSION AREA POLICIES

Of the six policy directions recently approved by Council to guide future planning of the inner-city conversion areas, the following are applicable to the RS-2 areas:

- (a) Conserve the inner-city conversion areas as areas of intermediate density to provide an alternative to apartment or single-family areas, and to maintain a variety of affordable, ground-oriented housing;
- (b) New development should achieve a significant net increase in the number of dwelling units, provided that it is small-scale and respects the character and diversity of existing development;
- (c) Lower density conversion areas (RS-2 and RS-1A) should be included in the review of areas for increasing housing supply proposed in Coreplan.

These policies guided the review of apartments and townhouses in RS-2.

OPPORTUNITIES FOR APARTMENT AND TOWNHOUSE DEVELOPMENT

In reviewing the appropriateness of apartment and townhouse development in the RS-2 areas it is important to note that the lands so zoned are not homogeneous. The different characteristics of each area, such as the variety of lot sizes and subdivision patterns are significant in determining the feasibility and desirability of apartments and townhouses. Some situations clearly provide better opportunities than others.

Many RS-2 lands are similar in physical character to RS-1 areas. In these areas, parcel sizes and subdivision patterns are conventional as can be seen in Appendices 2-6. Standard lots are 33' X 120' and the subdivision pattern follows the conventional grid. One-family and two-family<sup>1</sup> development results in a density of approximately 11 units per acre, while multiple conversion dwellings achieve approximately 25 units per acre.

Substandard parcels exist in the Turner-Ferndale area and around Quebec Street between 22nd and 28th Avenues (see Appendices 2 and 4). Parcel sizes are typically 2,700 square feet in Turner-Ferndale and 2,200 square feet around Quebec Street. These areas are often attractive because of the visual interest, surprise, and strong flavor of urban living resulting from the irregular subdivision, discontinuous street pattern, and extremely shallow front yards. Higher dwelling unit densities are achieved in these areas (approximately 16-20 units per acre for one-family dwellings and 30-40 units per acre for multiple conversion dwellings).

The standard and substandard parcels in the RS-2 areas are not generally suitable for apartment or townhouse development because they presently provide sound affordable housing at good densities. The net unit gain through redevelopment would be marginal since the site assembly costs would be high, and affordable accommodation would be lost. To allow development of these parcels at the high densities which would be necessary to achieve significant net unit gains and offset assembly costs would be inconsistent with the role approved for the inner-city conversion areas.

While the majority of parcels in the RS-2 areas are standard in size (4,000 square feet) several unusually large, deep parcels exist, particularly in the Riley Park and Cedar Cottage areas (see Appendices 5 and 6). These parcels range in size from 7,500 to 20,500 square feet. The current densities which may be achieved on these parcels are approximately 4 units per acre with a one-family dwelling, 9 units per acre with a two-family dwelling, and 17 units per acre with a four unit multiple conversion dwelling. These densities are significantly less than those achieved on the typical standard and substandard parcels. The site coverage of these parcels is usually very low (12%), resulting in extremely large rear yards. Residential units are usually not well designed to take advantage of the larger lots, particularly with respect to privacy and usable outdoor space. In summary, these large lots are underutilized.

In addition to these large, deep parcels, five other poorly utilized parcels exist in the Riley Park area. These parcels are landlocked (isolated from streets and lanes)

<sup>1</sup> Based upon the minimum site area of 7,200 square feet for a two-family dwelling or developed with non-conforming uses (see Appendix 4). The landlocked parcels are presently undevelopable because they have no street or lane access. The two non-conforming uses, a factory and a warehouse, are incompatible in the areas and have generated complaints.

While the standard and substandard sized parcels are not generally suitable for apartment or townhouse development, it would be desirable to allow these large parcels, landlocked parcels, and parcels containing non-conforming uses to develop with small-scale apartments or townhouses. This would allow these parcels to redevelop at densities common in the RS-2 areas and would allow building designs which are complementary to neighbouring development and which effectively utilize the deep parcels. In some cases 'infill development' would be an appropriate alternative form of development on these parcels. Buildings which are attractive or provide affordable accommodation could then be retained and infill in the form of a one-family or two-family dwelling, apartments or townhouses could be developed on the same parcel.

Allowing small-scale apartments, townhouses and infill development only in these special circumstances, while not encouraging them in other situations, is consistent with the recently approved inner-city conversion areas policies which encourage conservation of the areas of intermediate density and support new, in-character development only where a significant net increase in the number of dwelling units is achieved. Small-scale apartments, townhouses and infill development will provide good, compatibly-designed family accommodation within the range of densities experienced in the RS-2 areas.

As stated in the conversion area planning policies, the areas are not considered suitable for typical 'box-shaped' apartments. Rather, the form of apartment envisioned would be similar in appearance to a multiple conversion dwelling and provide ground-oriented family accommodation.

#### PROPOSED POLICY FOR APARTMENT, TOWNHOUSE, AND INFILL DEVELOPMENT IN RS-2

To allow suitably designed small-scaled apartments, townhouses, and infill developments in instances where they are desirable in the RS-2 areas, the following actions are proposed:

- (a) lift the moratorium on townhouse development;
- (b) adopt guidelines to describe sites suitable for apartment, townhouse or infill developments and to encourage development which is compatible with the neighbourhoods;
- (c) amend the Zoning and Development By-Law for clarity and to permit infill development.

It is proposed that the moratorium on townhouse development in RS-2 be lifted to permit both apartments and townhouses as conditional uses. However, merely lifting the moratorium is not sufficient to signify where and in what circumstances such uses would be appropriate. Guidelines are necessary to direct apartment and townhouse initiatives to those sites identified in the previous section as suitable and to encourage development which is small-scale and respects the character and diversity of existing development in the neighbourhoods. Such guidelines will implement the policies adopted by Council for the conversion areas.

Guidelines

To guide potential development permit applicants and assist the Director of Planning when considering apartments, townhouses, and infill developments as conditional uses, it is proposed that the following guidelines be adopted:

1. *Apartment, townhouse and infill development proposals will only be considered on sites which consist of:*

- (a) *one single parcel, on record in the Land Title Office for Vancouver prior to (date of approval), which has an area not less than 10,000 square feet:*

(This site area is the minimum presently specified in the RM-1 regulations governing apartments and townhouses in RS-2 and permits individual large existing lots to be redeveloped.)

- (b) *a site assembly comprising a maximum of two contiguous parcels, on record in the Land Title Office for Vancouver prior to (date of approval), where each parcel has a depth greater than 160 feet or an area greater than 7,200 sq. ft.;*

(A maximum assembly of two parcels will maintain a scale of development compatible with the neighbourhoods. Development activity would be directed to large, deep lots to achieve a significant net unit gain.)

- (c) *a site assembly comprising more than two contiguous parcels where it can be satisfactorily demonstrated that such an assembly would improve an irregular subdivision situation;*

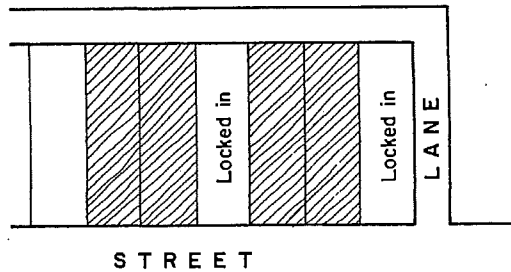
(Examples are illustrated in Appendix 7.)

- (d) *a site developed with non-conforming uses.*

(Apartments or townhouses should be allowed on these sites to increase the economic feasibility of the replacement of non-conforming uses with compatible uses.)

2. *No assemblies or individual parcel developments should 'lock in' the apartment, townhouse or infill development potential of an abutting large or deep lot.*

(Examples of these situations are illustrated below. In these instances, assemblies which include the potentially locked-in parcels would be encouraged. This policy is similar to that applied in the RM Districts except that the City will have greater opportunities to ensure appropriate consolidations through the conditional use approval process.)



3. *The project design should reflect the character of the streetscape, including for example, roof shapes, exterior materials, and design details of nearby housing. The design should be neighbourly and compatible with the character of adjacent uses with respect to noise, privacy, neighbour's windows, and sunlight penetration. The design should also complement existing topography, landscape, and elements such as walls and fences.*

(This guideline will encourage neighbourhood compatibility of development proposals.)

4. *Development Permit Applications should include, in addition to the items in Section 4 of the Zoning and Development By-Law:*
- (a) *a site plan which locates buildings on abutting parcels including their windows, doors, and outdoor living spaces;*
  - (b) *a landscape plan which indicates major trees to be retained or removed, the species, number and sizes of new plant materials, paving materials, walls, fences, arbors, and trellises;*
  - (c) *a drawing showing the view of the proposed development and the developments on the two abutting parcels as seen from the street on which the proposal fronts.*

(This information will enable review of development proposals in relation to their neighbours.)

#### Implications of the Guidelines

The proposed site criteria would preclude apartments, townhouses, and infill development from the Turner-Ferndale RS-2 area because the existing lots are too small. This is consistent with the policy specifically adopted for that area. Likewise, no lots in the Heather Park RS-2 area would satisfy the proposed criteria and this is consistent with the objectives of the Fairview Heights and Heather Park Citizens' Planning Committee. Development on Point Grey Road will continue to be guided by the 'Point Grey Road Water-front Plan'. If all the lots which have development potential under the criteria were developed, a net gain of slightly more than 200 units on approximately 30 sites evenly divided between the Cedar Cottage and Riley Park RS-2 areas would result.

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Apartments and townhouses are currently listed as conditional uses in RS-2, subject to RM-1 District Schedule regulations. To facilitate the use of the RS-2 District Schedule and eliminate the need to refer to two schedules when dealing with apartments and townhouses it would be desirable to incorporate the appropriate RM-1 regulations into the RS-2 District Schedule. Such a change would also facilitate the eventual removal of the RM-1 District Schedule from the Zoning and Development By-Law. No areas of the City are zoned RM-1.

The majority of the RM-1 regulations are desirable to regulate apartment, townhouse, and infill development in RS-2. Together with the proposed guidelines, they will aid in achieving forms of development which are compatible with the RS-2 neighbourhoods. The recently constructed townhouses on Seventeenth Avenue at Quebec Street were developed in accordance with these regulations. Since they were constructed, no negative comments have been received, indicating there is general neighbourhood acceptance of these projects.

While the RM-1 regulations are generally acceptable, they contain a height requirement of 'the least of 30 feet, two storeys plus a cellar or one storey plus a basement'. This height requirement for apartments and townhouses is inconsistent with the height requirement for all other developments in the RS-2 zoned which is 'the lesser of 35 feet or 2 1/2 storeys'. It is proposed that the height requirement for all development in RS-2 be the same as now applies in the RS-2 District Schedule: 'the lesser of 35 feet or 2 1/2 storeys'.

With the exception of the height requirement, it is proposed that the regulations from the RM-1 District Schedule be consolidated into the RS-2 District Schedule to apply to apartment, townhouse, and infill development.

Additionally, it is necessary to amend the RS-2 District Schedule to list 'infill development' as a conditional use. To allow infill development to be optimally sited in relation to existing buildings, it is proposed that the yard provisions of the Schedule may be relaxed.

The necessary Zoning and Development By-Law amendments are listed in Appendix 8.

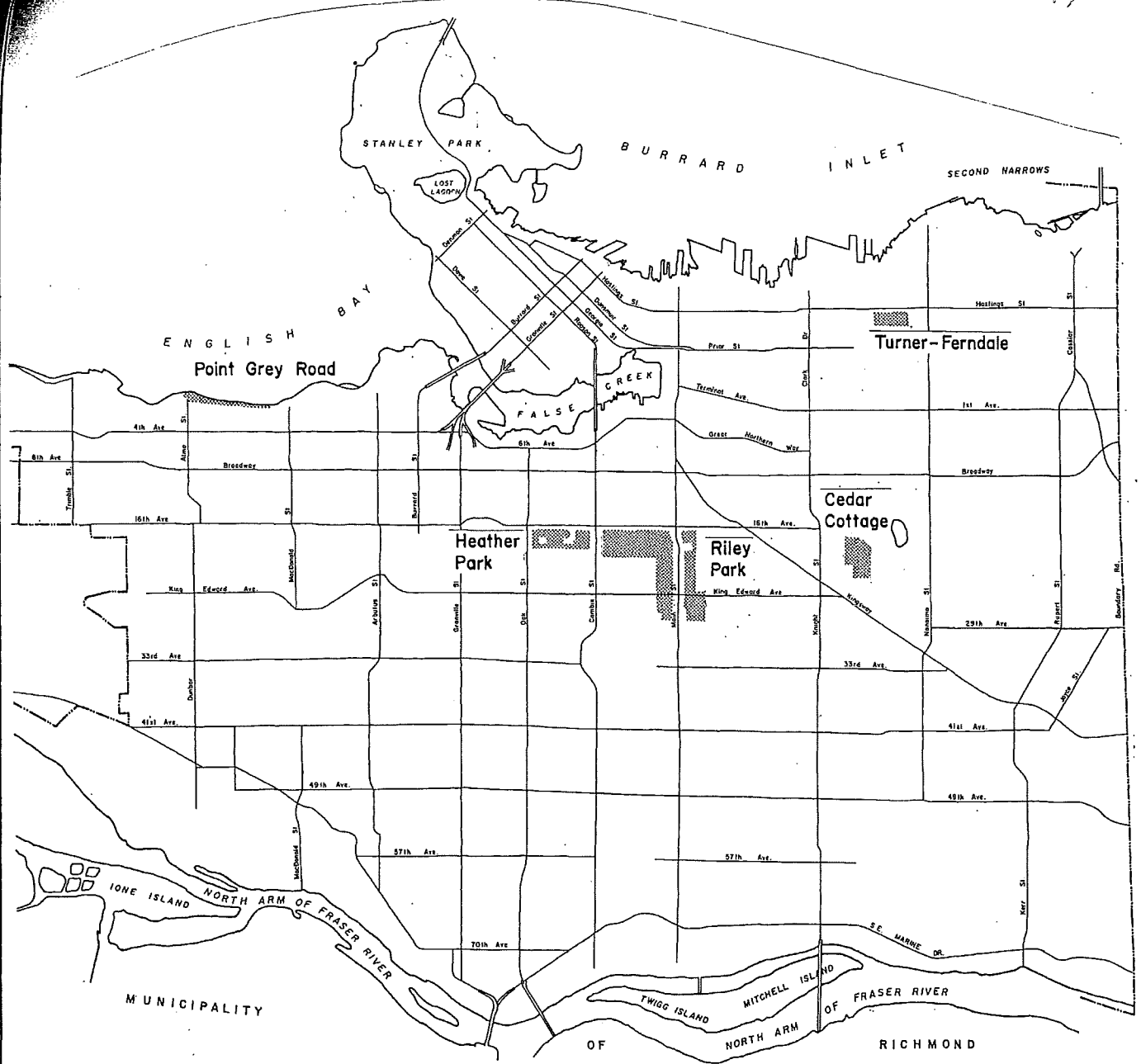
RECOMMENDATIONS

The Director of Planning recommends:

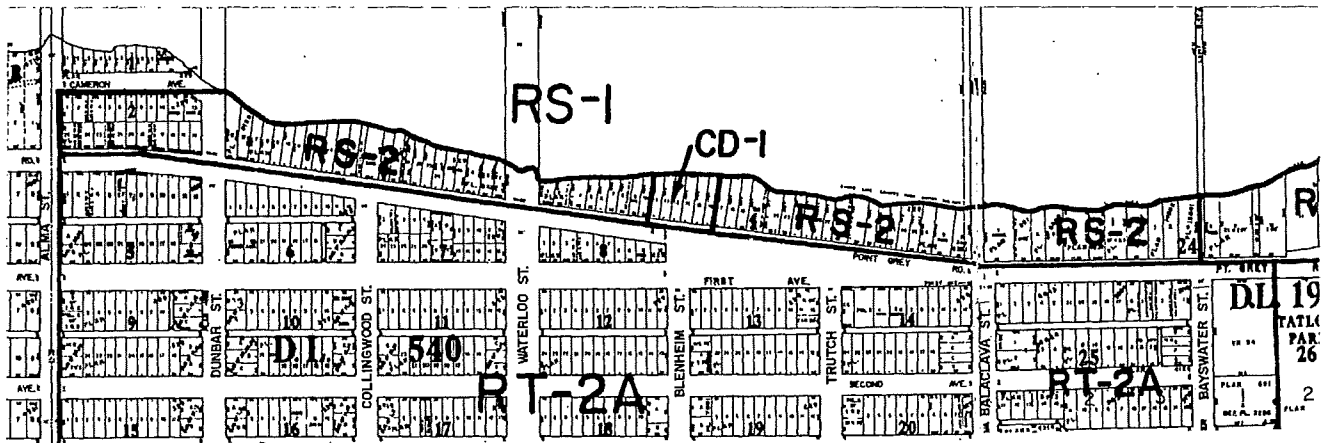
- A. THAT Council lift the moratorium on townhouses in RS-2 and adopt the site and development guidelines contained in this report. The guidelines would be applicable to Infill Development only after Council approves the necessary amendments to the Zoning and Development By-Law.
- B. THAT Council instruct the Director of Planning to make application to amend the Zoning and Development By-Law in accordance with the proposed amendments generally listed in Appendix 8 of this report, and that this application be referred directly to a Public Hearing."

The City Manager RECOMMENDS that the recommendations of the Director of Planning be approved.

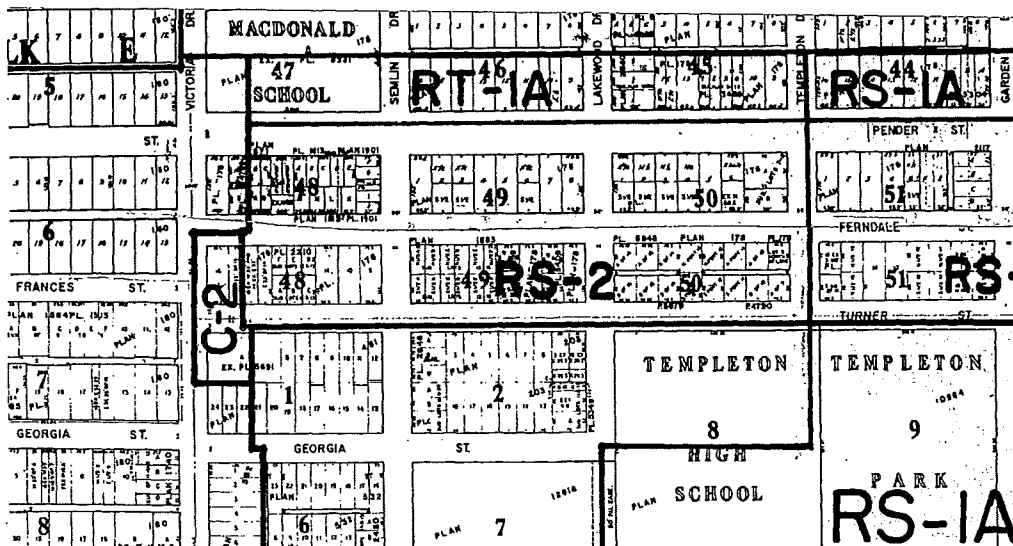




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	Drawn	I.G.C.	
City of Vancouver, Planning Department	Scale		No.

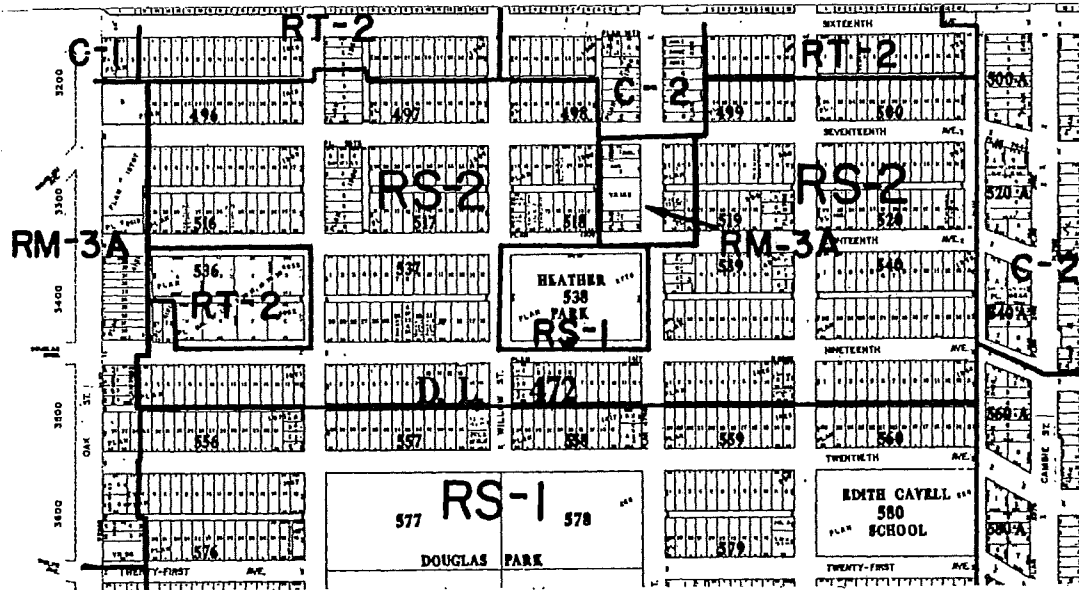


KITSILANO: POINT GREY ROAD RS-2 AREA

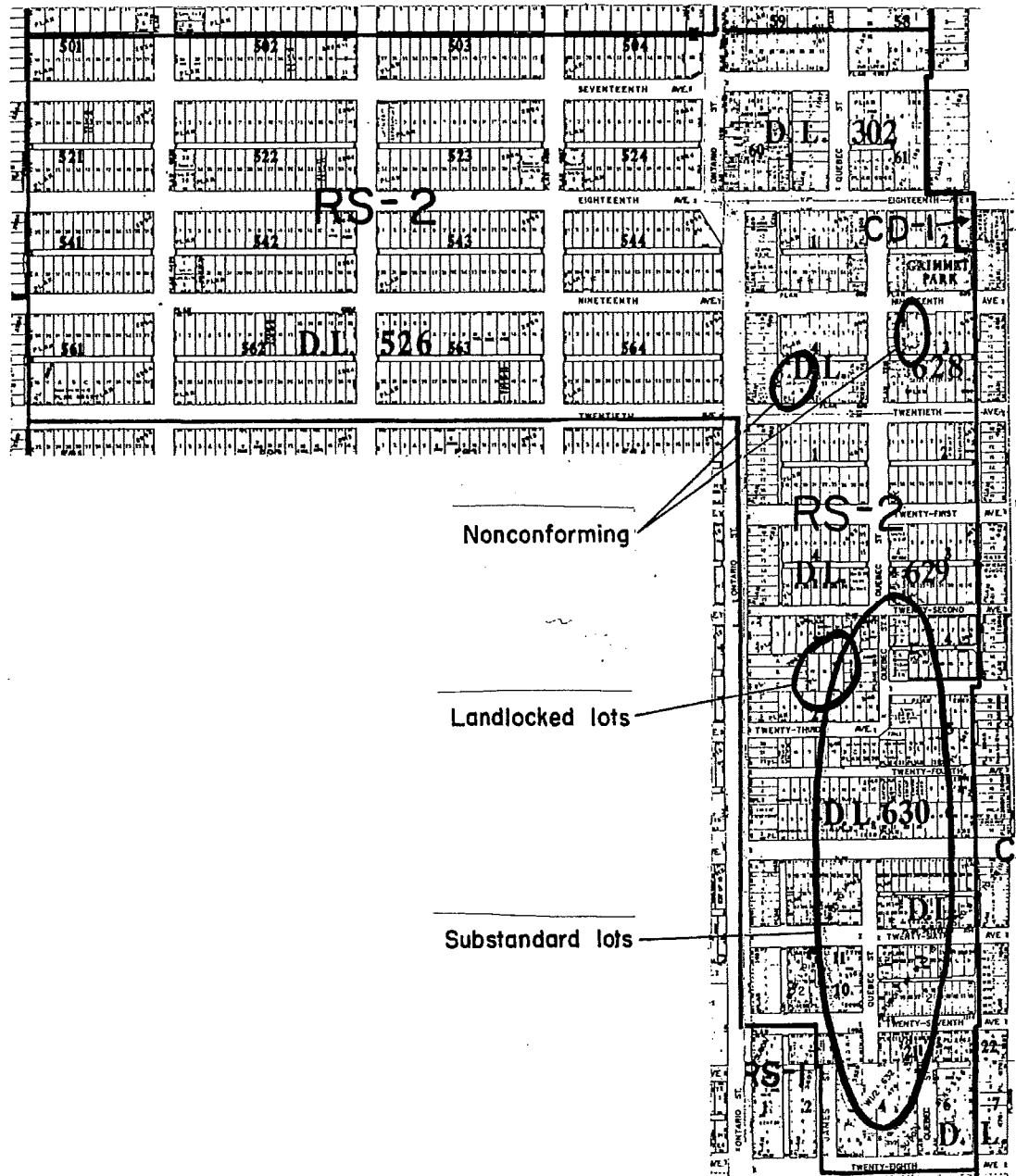


GRANDVIEW - WOODLAND: TURNER - FERNSDALE RS-2 AREA

RS-2 AREAS	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.



HEATHER PARK RS-2 AREA	Date	Nov., 1983	↑
	Drawn	I. G. C.	
City of Vancouver Planning Department	Scale		No.



Nonconforming

Landlocked lots

Substandard lots

RILEY PARK RS-2 AREA ( West )

City of Vancouver Planning Department

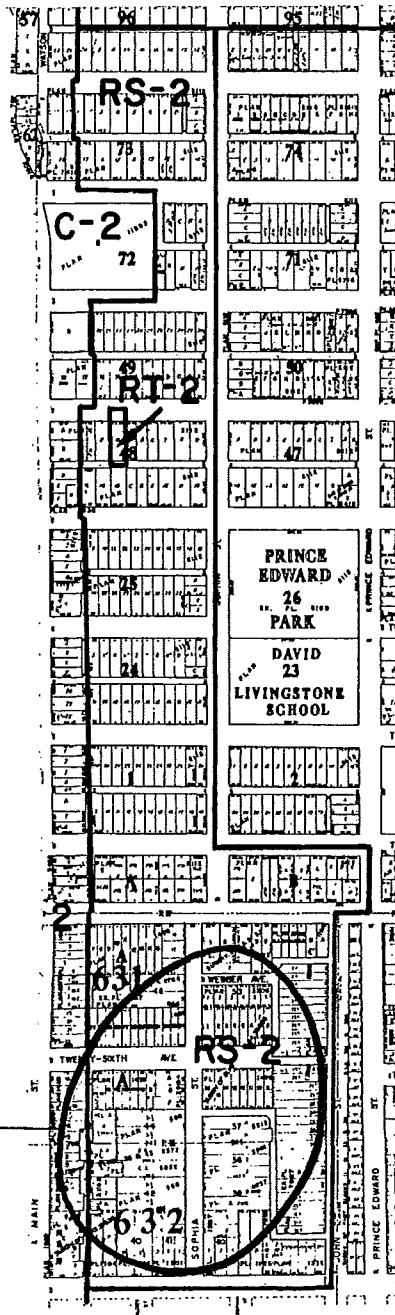
Date Nov., 1983

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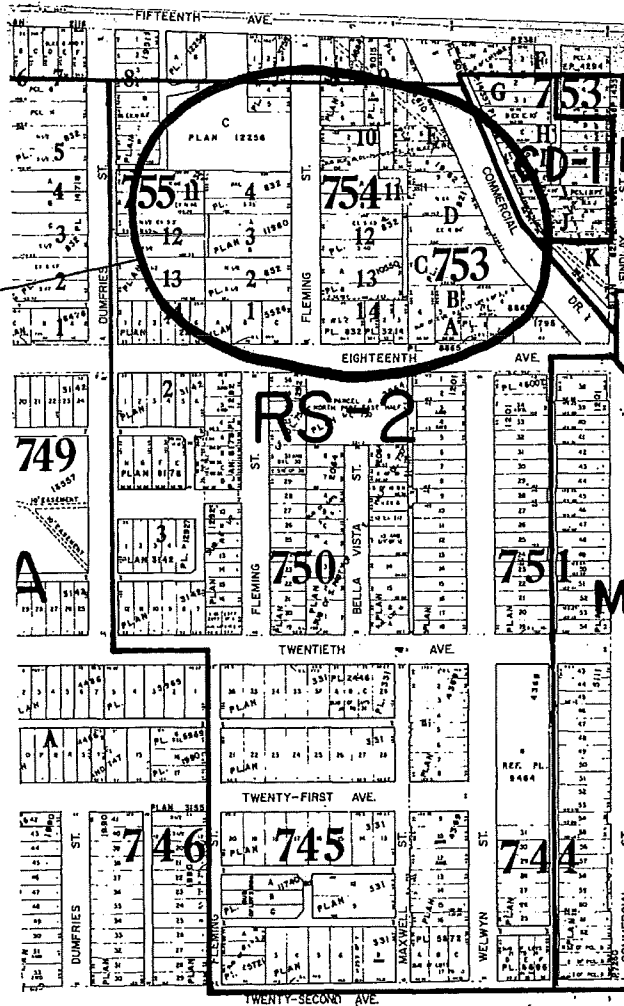
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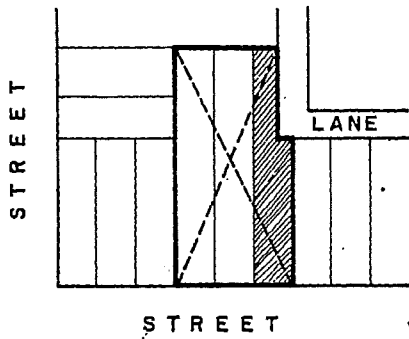
Large and deep lots

RILEY PARK RS-2 AREA ( East )	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.

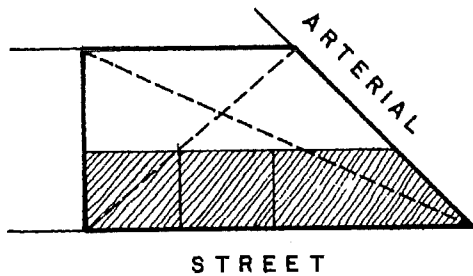
Large and deep lots



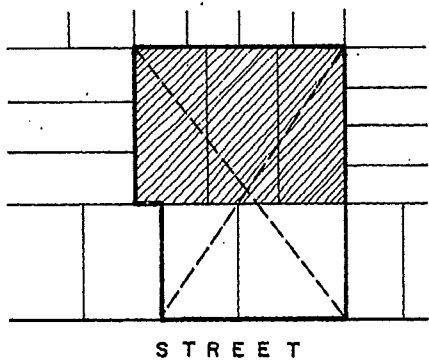
CEDAR COTTAGE RS-2 AREA	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.



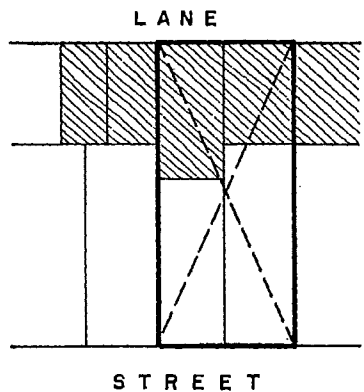
- excluding the hatched lot from the assembly would leave a very deep narrow lot.




- excluding the hatched lots would force access to the development site directly off an arterial and very small, shallow lots would remain for single family houses.



- without an assembly greater than two lots the interior lots would be landlocked and undevelopable.



- excluding the lots fronting the lane would result in the continuation of this undesirable situation.

<b>"IRREGULAR" SUBDIVISION SITUATIONS</b>	<b>Date</b>	Nov., 1983	
	<b>Drawn</b>	I. G. C.	
City of Vancouver Planning Department	<b>Scale</b>		<b>No.</b>

Appendix 8

Proposed Amendments to the RS-2 District Schedule

- 3.2.A - delete "Apartment Building, subject to the RM-1 District Schedule regulations."
- add "Apartment Building"
- 3.2.1 - add "Infill Development"
- 3.2.T - delete "Townhouses, subject to the RM-1 District Schedule regulations."
- add "Townhouses."
- 4.1.1 - add "The minimum site area for an apartment building, infill development or townhouses shall be 10,000 square feet."
- 4.5.3 - add "For an apartment building, infill development or townhouses, a side yard with a minimum width of 7 feet shall be provided on each side of the principal building(s), but the minimum width shall be increased so that the outer walls of the building are contained within a 135 degree angle extended horizontally and measured inwardly from any and all points on the side property lines."
- 4.7.2 - add "For an apartment building, infill development or townhouses, the floor space ratio shall not exceed 0.75."
- 4.8.4 - add "For an apartment building, infill development or townhouses, the maximum site coverage of the site by surface parking, accessory buildings, manoeuvring aisles, driveways, loading areas, other vehicular facilities and all principal buildings shall be 40 percent where no principal building exceeds 35 feet or 2 1/2 storeys in height, or 55 percent where no principal building exceeds 20 feet or one storey plus a cellar in height."
- 4.8.5 - add "For an apartment building, infill development or townhouses, in the case of a sloping site where a structure is located in or beneath a yard, the structure shall be excluded from the site coverage calculation provided that it does not, except for required earth cover, permitted fences and similar items, project above the average elevation of the portions of the streets, lan or sites located adjacent to such structure, and does not, in any event, project more than 3 feet above the actual elevation of adjoining streets, lanes and sites."
- 4.10 - add "Horizontal Angle of Daylight for Apartment Buildings, Infill Development and Townhouses"
- 4.10.1 - add "Where a habitable room has a window in any interior side yard, any window facing the side property line shall be located at least 10 feet from that property line."
- 4.10.2 - add "All residential buildings shall be sited so that a plane formed by an angle of 50 degrees, or two angles with a sum of 70 degrees, extended horizontally from the midpoint of every window referred to in section 4.10.1 and measured at sill level, shall be unobstructed over a distance of 80 feet."



Appendix 8 (Cont'd)

4.10.3 - add

"For the purpose of section 4.10.2 the following shall be considered as obstructions:

- (a) the theoretically equivalent buildings located on any adjoining sites in any R district in a corresponding position by rotating the plot plan of the proposed building 180 degrees about a horizontal axis located on the property lines of the proposed site;
- (b) part of the same building, including permitted projections;
- (c) the maximum size building permitted under the appropriate C or M District Schedule if the site adjoins a C or M site.'

4.10.4 - add

"Where a window is greater in area than the minimum required under the Building By-Law, the above conditions may be tested against the least restrictive portion of the window equal in area to the required minimum."

4.10.5 - add

"For the purpose of section 4.10.1, a bathroom or kitchen shall not be considered as a habitable room unless its area is greater than 10 percent of the total floor area of its dwelling unit, or 70 square feet, whichever is the greater."

5.2 - add

"Relaxation of Regulations

The Development Permit Board or the Director of Planning, as the case may be, may relax the yard provisions of Sections 4.5.3 of this Schedule in the case of infill development provided that:

- (a) he first has regard to applicable guidelines or policies which City Council may, from time to time, determine; and
- (b) the relaxation facilitates an overall better relationship of the infill development with the existing buildings on the development site and abutting sites."

CHIEF for DE  
CITY MANAGERS OFFICE  
RECEIVED  
PLANNING DEPARTMENT

5302  
ROUTED  
RELEASE  
FOR FILE  
DEC - 1983

22

TO: City Manager (for Standing Committee on Planning and Development)  
SUBJECT: Apartments and Townhouses in RS-2 Zoned Areas  
CLASSIFICATION: RECOMMENDATION

The Director of Planning reports as follows:

BACKGROUND AND PURPOSE

A study of the inner-city conversion areas was authorized by Council in November 1981 to include general policy directions as well as analysis of specific local areas including the RS-2 zoned areas. Council received a general update on progress in October 1982, and in June 1983 approved six policy directions to guide future planning of the inner-city conversion areas. The future role of these areas can be summarized as conservation and selective densification, providing alternatives to apartment and single-family areas within the city. Using the six policy directions as a framework, studies on specific topics are presently being completed, including the subject of this report: policy for apartments and townhouses in the RS-2 zoned areas.

The purpose of this report is to review existing Council policies for apartments and townhouses in the RS-2 areas and to propose new policies, guidelines, and by-law amendments to govern these forms of development. Additionally, this report proposes that 'infill development' be permitted as a conditional use in RS-2.

INTRODUCTION

The RS-2 areas are located in Kitsilano, Riley Park, Cedar Cottage, Grandview-Woodland, and Heather Park. These areas are mapped in Appendices 1-6.

The RS-2 District Schedule permits one-family dwellings as an outright approval use. The RS-2 Schedule also lists a range of conditional approval residential uses: two-family dwelling on a site not less than 7,200 square feet, multiple conversion dwelling, boarding or rooming house, apartment building and townhouses. While apartment building and townhouses are listed as conditional uses in the RS-2 Schedule, Council has adopted policies which prohibit apartment and townhouse development in that zone. These policies are outlined in the next section of this report.

CURRENT RS-2 POLICIES

In 1970, the Zoning and Development By-law was amended to list apartment building and townhouses as conditional uses in the RS-2 District Schedule subject to the RM-1 District Schedule regulations. In 1976, Council placed a moratorium on townhouse development in the RS-2 areas pending a review of low-density multiple housing in the RS-1 areas. The moratorium was also considered to apply to apartments. The moratorium was not lifted subsequent to the RS-1 review and no further analysis of RS-2 was undertaken.

The need to review the moratorium has become apparent with increasing development interest related to several large, deep, underutilized parcels in some of the RS-2 areas. The Planning Department has recently received several enquiries regarding these properties. Since the moratorium was established, two townhouse projects, one at 17th Avenue and Quebec Street and one at 27th Avenue and Quebec Street, have been approved by the Director of Planning following Council endorsement. While approval of these projects did not constitute a formal removal of the moratorium, it did highlight the need to reassess the policy.

In addition to this moratorium policy which is applicable to all RS-2 areas, Council has adopted two area-specific policies:

Point Grey Road Waterfront Plan (December 7, 1976): Apartments and townhouses shall not be permitted on the north side of Point Grey Road (also applies to RT-2 area on north side of Point Grey Road);

Grandview-Woodland Area Policy Plan - Part 1 (June 12, 1979): Prepare a comprehensive development plan for the Turner-Ferndale area which excludes townhouse development.

INNER-CITY CONVERSION AREA POLICIES

Of the six policy directions recently approved by Council to guide future planning of the inner-city conversion areas, the following are applicable to the RS-2 areas:

- (a) Conserve the inner-city conversion areas as areas of intermediate density to provide an alternative to apartment or single-family areas, and to maintain a variety of affordable, ground-oriented housing;
- (b) New development should achieve a significant net increase in the number of dwelling units, provided that it is small-scale and respects the character and diversity of existing development;
- (c) Lower density conversion areas (RS-2 and RS-1A) should be included in the review of areas for increasing housing supply proposed in Coreplan.

These policies guided the review of apartments and townhouses in RS-2.

OPPORTUNITIES FOR APARTMENT AND TOWNHOUSE DEVELOPMENT

In reviewing the appropriateness of apartment and townhouse development in the RS-2 areas, it is important to note that the lands so zoned are not homogeneous. The different characteristics of each area, such as the variety of lot sizes and subdivision patterns, are significant in determining the feasibility and desirability of apartments and townhouses. Some situations clearly provide better opportunities than others.

Many RS-2 lands are similar in physical character to RS-1 areas. In these areas, parcel sizes and subdivision patterns are conventional as can be seen in Appendices 2-6. Standard lots are 33' X 120' and the subdivision pattern follows the conventional grid. One-family and two-family<sup>1</sup> development results in a density of approximately 11 units per acre, while multiple conversion dwellings achieve approximately 25 units per acre.

Substandard parcels exist in the Turner-Ferndale area and around Quebec Street between 22nd and 28th Avenues (see Appendices 2 and 4). Parcel sizes are typically 2,700 square feet in Turner-Ferndale and 2,200 square feet around Quebec Street. These areas are often attractive because of the visual interest, surprise, and strong flavor of urban living resulting from the irregular subdivision, discontinuous street pattern, and extremely shallow front yards. Higher dwelling unit densities are achieved in these areas (approximately 16-20 units per acre for one-family dwellings and 30-40 units per acre for multiple conversion dwellings).

The standard and substandard parcels in the RS-2 areas are not generally suitable for apartment or townhouse development because they presently provide sound affordable housing at good densities. The net unit gain through redevelopment would be marginal, the site assembly costs would be high, and affordable accommodation would be lost. To allow development of these parcels at the high densities which would be necessary to achieve significant net unit gains and offset assembly costs would be inconsistent with the role approved for the inner-city conversion areas.

While the majority of parcels in the RS-2 areas are standard in size (4,000 square feet) several unusually large, deep parcels exist, particularly in the Riley Park and Cedar Cottage areas (see Appendices 5 and 6). These parcels range in size from 7,500 to 20,500 square feet. The current densities which may be achieved on these parcels are approximately 4 units per acre with a one-family dwelling, 9 units per acre with a two-family dwelling, and 17 units per acre with a four unit multiple conversion dwelling. These densities are significantly less than those achieved on the typical standard and substandard parcels. The site coverage of these parcels is usually very low (12%), resulting in extremely large rear yards. Residential units are usually not well designed to take advantage of the larger lots, particularly with respect to privacy and usable outdoor space. In summary, these large lots are underutilized.

In addition to these large, deep parcels, five other poorly utilized parcels exist in the Riley Park area. These parcels are landlocked (isolated from streets and lanes)

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<sup>1</sup> Based upon the minimum site area of 7,200 square feet for a two-family dwelling.

or developed with non-conforming uses (see Appendix 4). The landlocked parcels are presently undevelopable because they have no street or lane access. The two non-conforming uses, a factory and a warehouse, are incompatible in the areas and have generated complaints.

While the standard and substandard sized parcels are not generally suitable for apartment or townhouse development, it would be desirable to allow these large parcels, landlocked parcels, and parcels containing non-conforming uses to develop with small-scale apartments or townhouses. This would allow these parcels to redevelop at densities common in the RS-2 areas and would allow building designs which are complementary to neighbouring development and which effectively utilize the deep parcels. In some cases 'infill development' would be an appropriate alternative form of development on these parcels. Buildings which are attractive or provide affordable accommodation could then be retained and infill in the form of a one-family or two-family dwelling, apartments or townhouses could be developed on the same parcel.

Allowing small-scale apartments, townhouses and infill development only in these special circumstances, while not encouraging them in other situations, is consistent with the recently approved inner-city conversion areas policies which encourage conservation of the areas of intermediate density and support new, in-character development only where a significant net increase in the number of dwelling units is achieved. Small-scale apartments, townhouses and infill development will provide good, compatibly-designed family accommodation within the range of densities experienced in the RS-2 areas.

As stated in the conversion area planning policies, the areas are not considered suitable for typical 'box-shaped' apartments. Rather, the form of apartment envisioned would be similar in appearance to a multiple conversion dwelling and provide ground-oriented family accommodation.

#### PROPOSED POLICY FOR APARTMENT, TOWNHOUSE, AND INFILL DEVELOPMENT IN RS-2

To allow suitably designed small-scaled apartments, townhouses, and infill developments in instances where they are desirable in the RS-2 areas, the following actions are proposed:

- (a) lift the moratorium on townhouse development;
- (b) adopt guidelines to describe sites suitable for apartment, townhouse or infill developments and to encourage development which is compatible with the neighbourhoods;
- (c) amend the Zoning and Development By-Law for clarity and to permit infill development.

It is proposed that the moratorium on townhouse development in RS-2 be lifted to permit both apartments and townhouses as conditional uses. However, merely lifting the moratorium is not sufficient to signify where and in what circumstances such uses would be appropriate. Guidelines are necessary to direct apartment and townhouse initiatives to those sites identified in the previous section as suitable and to encourage development which is small-scale and respects the character and diversity of existing development in the neighbourhoods. Such guidelines will implement the policies adopted by Council for the conversion areas.

#### Guidelines

To guide potential development permit applicants and assist the Director of Planning when considering apartments, townhouses, and infill developments as conditional uses, it is proposed that the following guidelines be adopted:

1. *Apartment, townhouse and infill development proposals will only be considered on sites which consist of:*
  - (a) *one single parcel, on record in the Land Title Office for Vancouver prior to (date of approval), which has an area not less than 10,000 square feet:*

(This site area is the minimum presently specified in the RM-1 regulations governing apartments and townhouses in RS-2 and permits individual large existing lots to be redeveloped.)

- (b) a site assembly comprising a maximum of two contiguous parcels, on record in the Land Title Office for Vancouver prior to (date of approval), where each parcel has a depth greater than 180 feet or an area greater than 7,200 sq. ft.;

(A maximum assembly of two parcels will maintain a scale of development compatible with the neighbourhoods. Development activity would be directed to large, deep lots to achieve a significant net unit gain.)

- (c) a site assembly comprising more than two contiguous parcels where it can be satisfactorily demonstrated that such an assembly would improve an irregular subdivision situation;

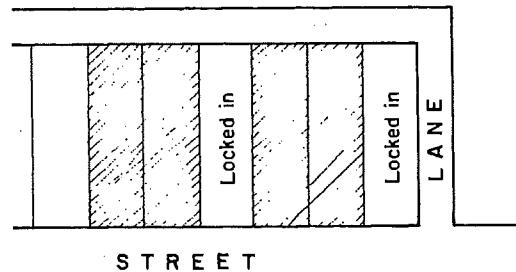
(Examples are illustrated in Appendix 7.)

- (d) a site developed with non-conforming uses.

(Apartments or townhouses should be allowed on these sites to increase the economic feasibility of the replacement of non-conforming uses with compatible uses.)

2. No assemblies or individual parcel developments should 'lock in' the apartment, townhouse or infill development potential of an abutting large or deep lot.

(Examples of these situations are illustrated below. In these instances, assemblies which include the potentially locked-in parcels would be encouraged. This policy is similar to that applied in the RM Districts except that the City will have greater opportunities to ensure appropriate consolidations through the conditional use approval process.)



3. The project design should reflect the character of the streetscape, including for example, roof shapes, exterior materials, and design details of nearby housing. The design should be neighbourly and compatible with the character of adjacent uses with respect to noise, privacy, neighbour's windows, and sunlight penetration. The design should also complement existing topography, landscape, and elements such as walls and fences.

(This guideline will encourage neighbourhood compatibility of development proposals.)

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(This information will enable review of development proposals in relation to their neighbours.)

#### Implications of the Guidelines

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#### RECOMMENDATIONS

The Director of Planning recommends:

- A. THAT Council lift the moratorium on townhouses in RS-2 and adopt the site and development guidelines contained in this report. The guidelines would be applicable to Infill Development only after Council approves the necessary amendments to the Zoning and Development By-Law.

B. THAT Council instruct the Director of Planning to make application to amend the Zoning and Development By-Law in accordance with the proposed amendments generally listed in Appendix 8 of this report, and that this application be referred directly to a Public Hearing."

The City Manager RECOMMENDS that the recommendations of the Director of Planning be approved.

City Manager to complete:

Approved KFD Bell Dec 2/83

Officials to be present

\_\_\_\_\_

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Report Reference

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Report Dated 1983 11 30

Department Head [Signature]

Author's Initials CBR:cp

Concurrence of other involved Departments:

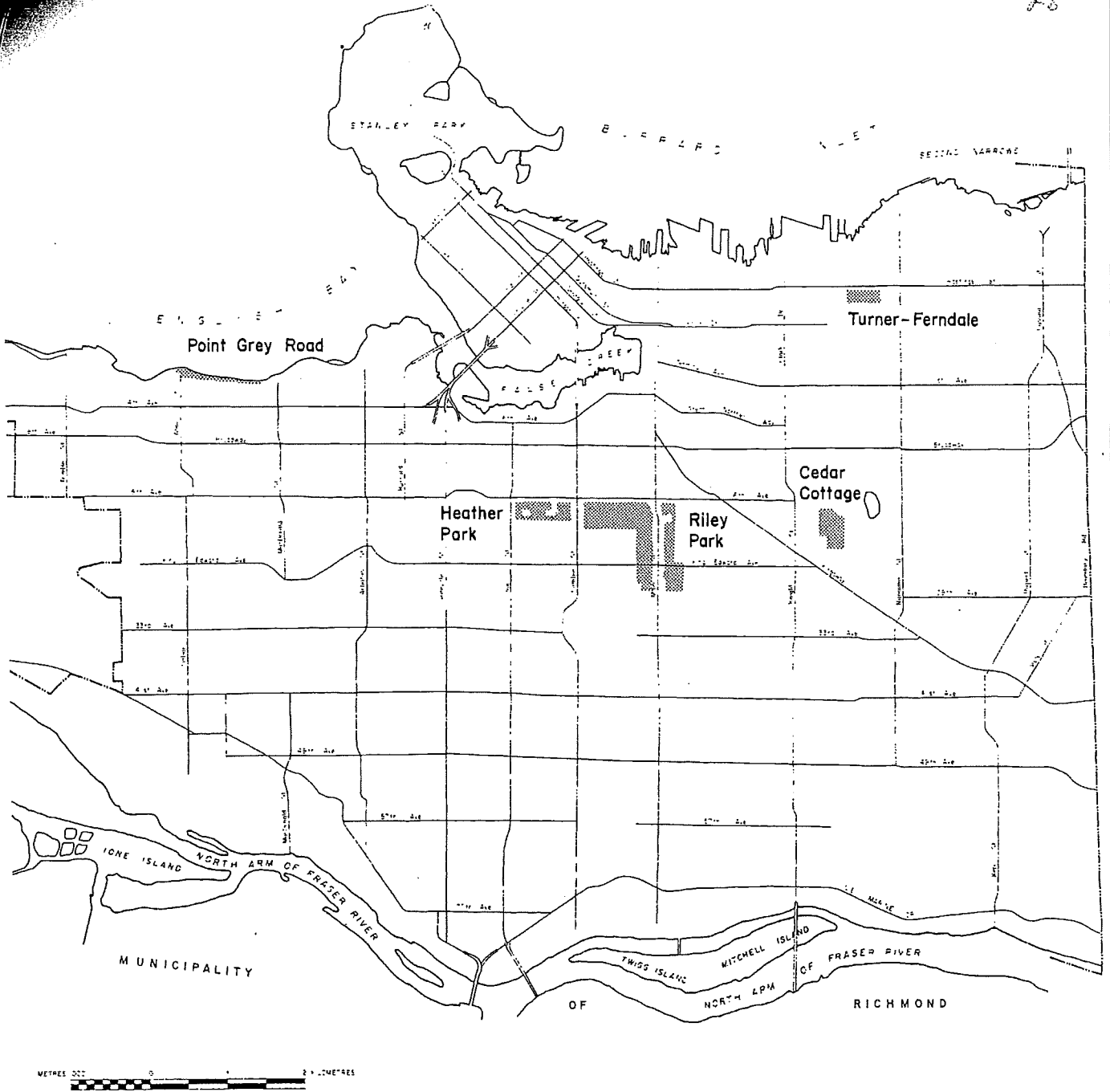
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Officials recommended to be present \_\_\_\_\_

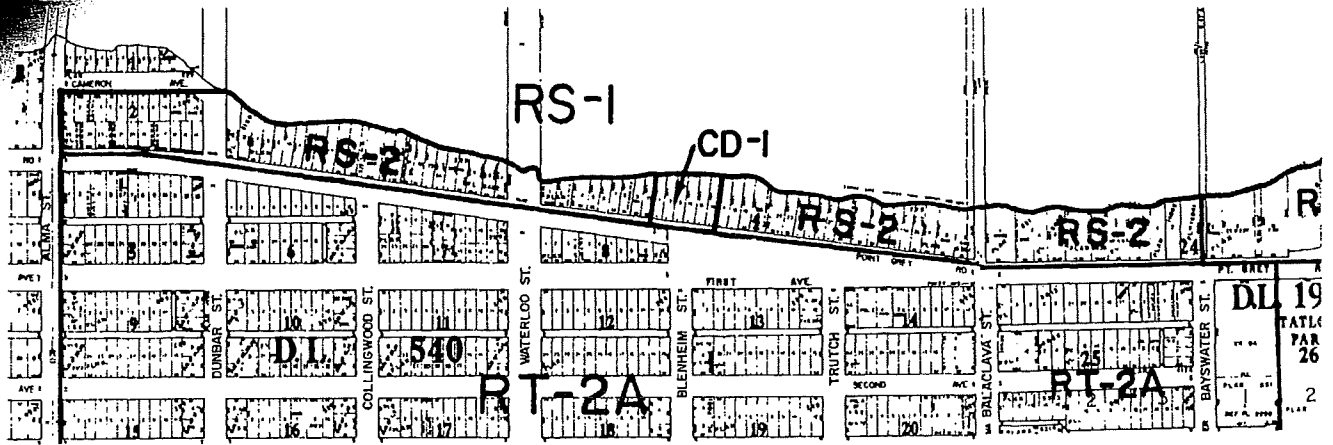
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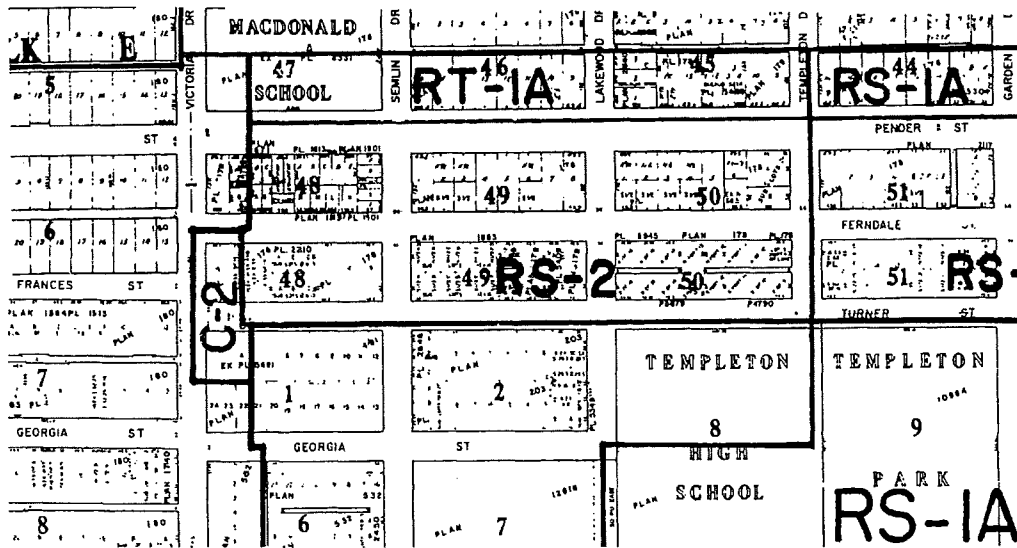
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City of Vancouver Planning Department	Scale		No.



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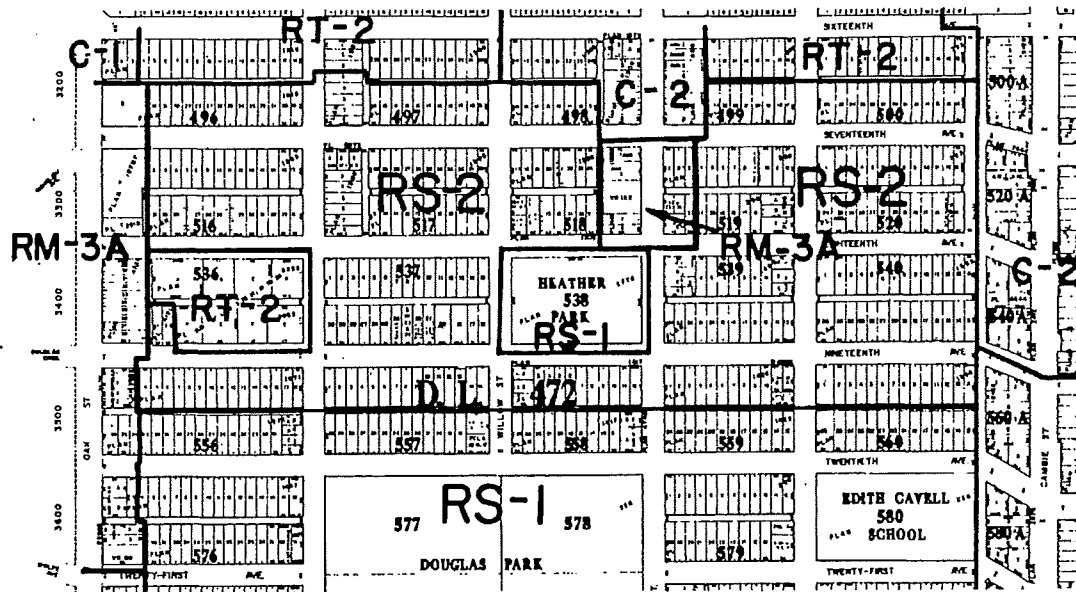


KITSILANO: POINT GREY ROAD RS-2 AREA



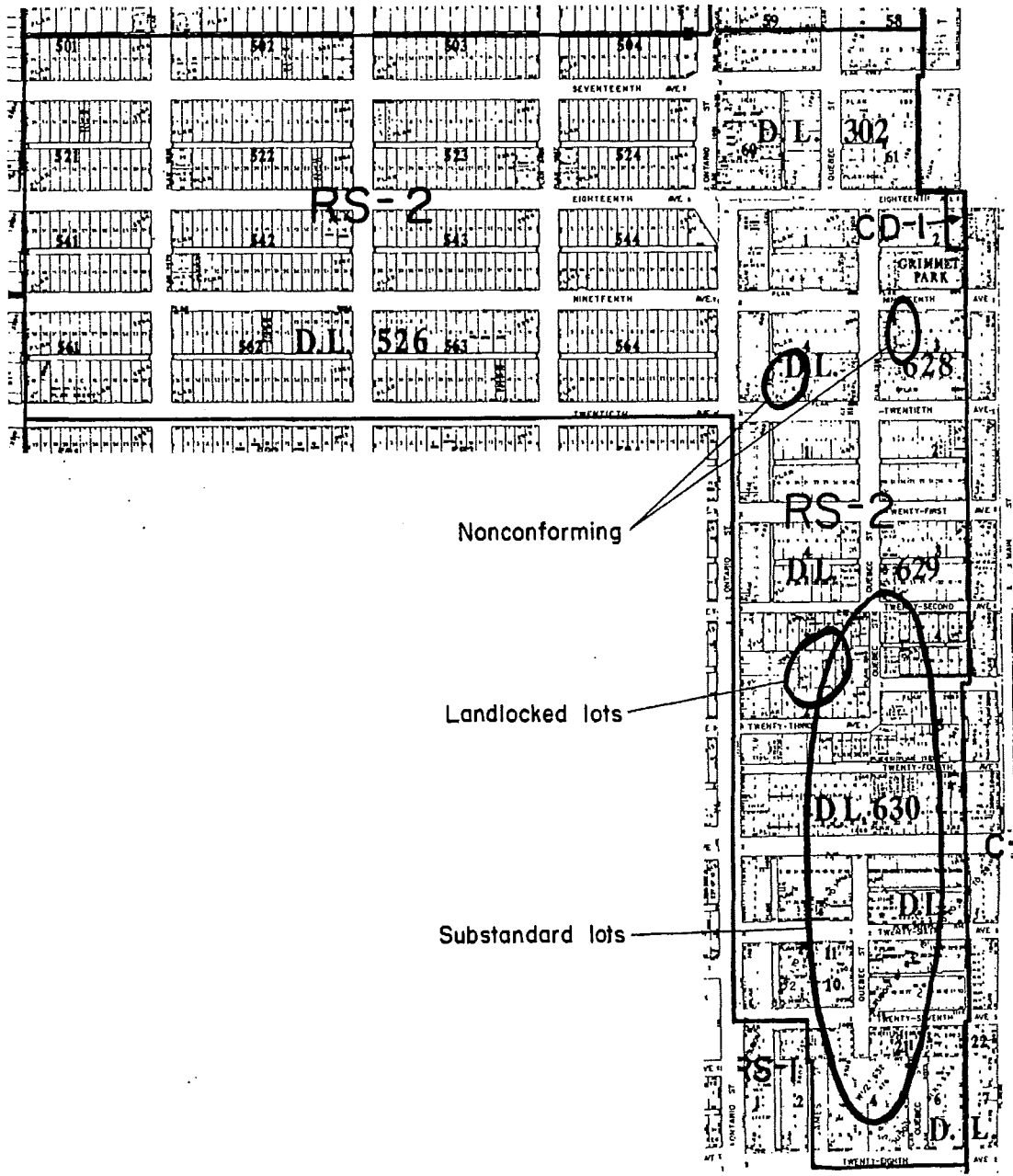
GRANDVIEW - WOODLAND: TURNER - FERNDALE RS-2 AREA

RS-2 AREAS	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.

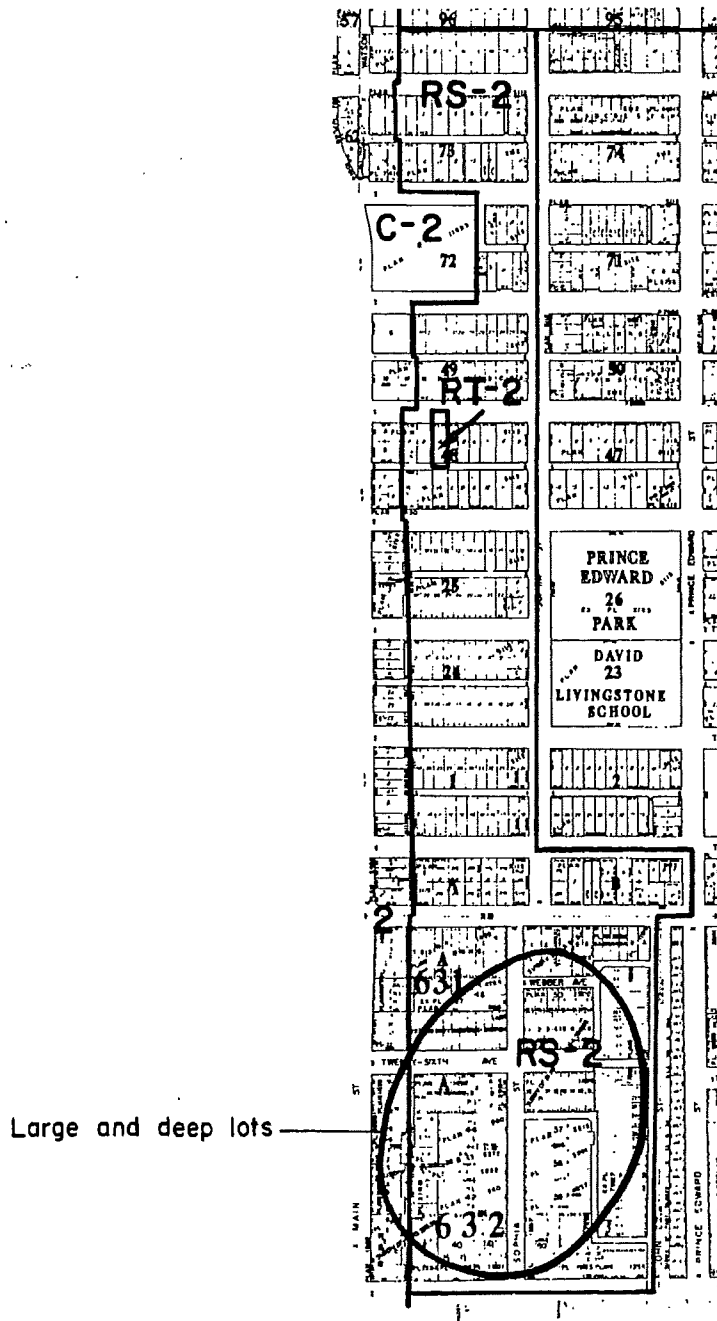


HEATHER PARK RS-2 AREA	Date	Nov., 1983	↑
	Drawn	I. G. C.	
City of Vancouver Planning Department	Scale		No.

31



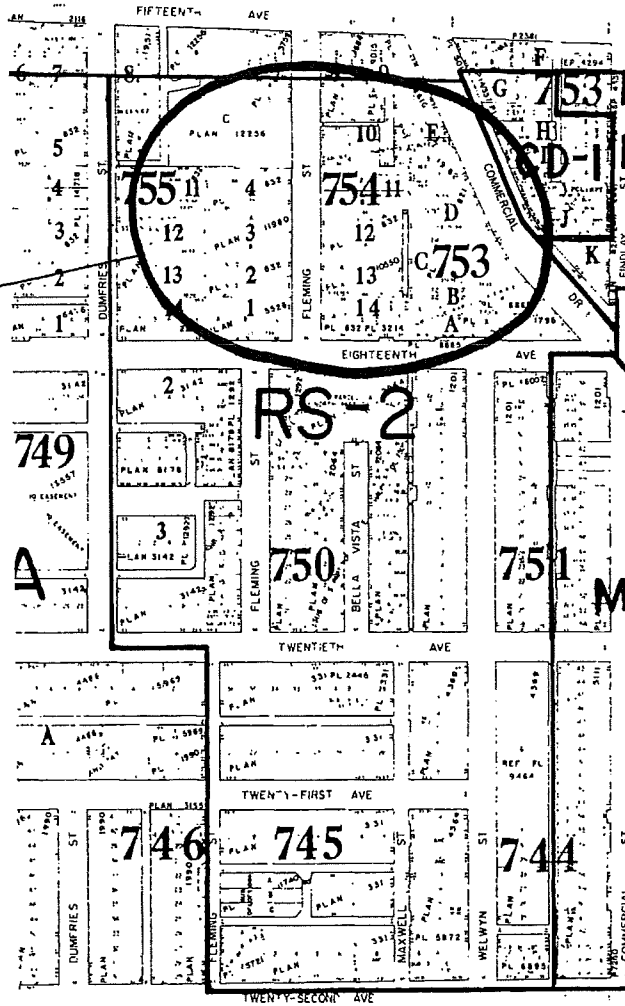
RILEY PARK RS-2 AREA ( West )	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.



Large and deep lots

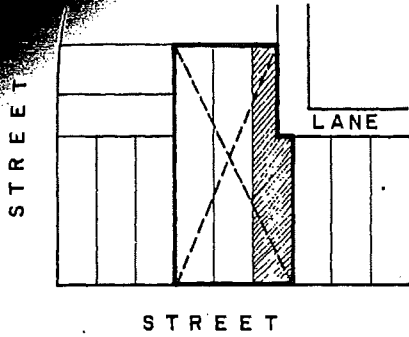
RILEY PARK RS-2 AREA ( East )	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.

Large and deep lots

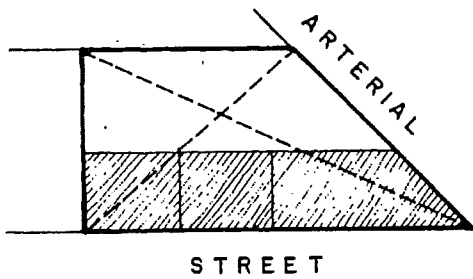


CEDAR COTTAGE RS-2 AREA	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.

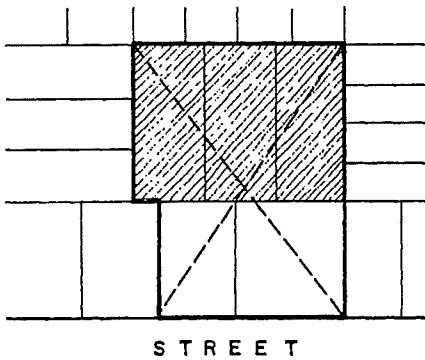
34



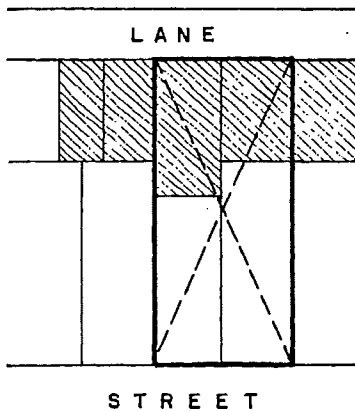
- excluding the hatched lot from the assembly would leave a very deep narrow lot.



- excluding the hatched lots would force access to the development site directly off an arterial and very small, shallow lots would remain for single family houses.



- without an assembly greater than two lots the interior lots would be land-locked and undevelopable.



- excluding the lots fronting the lane would result in the continuation of this undesirable situation.

"IRREGULAR" SUBDIVISION SITUATIONS	Date	Nov., 1983	↑
	Drawn	I.G.C.	
City of Vancouver Planning Department	Scale		No.

City of Vancouver



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PLANNING DEPARTMENT

Inter-Office Correspondence

1983 12 01

M E M O R A N D U M

TO: F. Bowers, City Manager

CC: R. Henry, City Clerk  
Attn: M. Cross  
R.J. Spaxman, Director of Planning

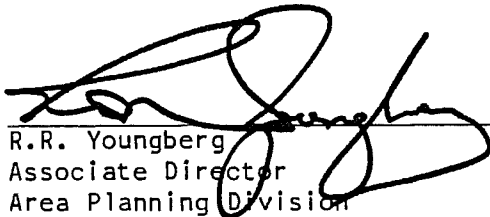
FROM: R.R. Youngberg, Associate Director,  
Area Planning

SUBJECT: Apartments and Townhouses in RS-2 Zoned Areas

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Please accept this report for the Planning and Development Committee agenda December 8th, 1983.

My apologies for the delay.

  
R.R. Youngberg  
Associate Director  
Area Planning Division

RRY:kd

26

Appendix 8

Proposed Amendments to the RS-2 District Schedule

- 3.2.A - delete "Apartment Building, subject to the RM-1 District Schedule regulations."  
- add "Apartment Building"
- 3.2.1 - add "Infill Development"
- 3.2.T - delete "Townhouses, subject to the RM-1 District Schedule regulations."  
- add "Townhouses."
- 4.1.1 - add "The minimum site area for an apartment building, infill development or townhouses shall be 10,000 square feet."
- 4.5.3 - add "For an apartment building, infill development or townhouses, a side yard with a minimum width of 7 feet shall be provided on each side of the principal building(s), but the minimum width shall be increased so that the outer walls of the building are contained within a 135 degree angle extended horizontally and measured inwardly from any and all points on the side property lines."
- 4.7.2 - add "For an apartment building, infill development or townhouses, the floor space ratio shall not exceed 0.75."
- 4.8.4 - add "For an apartment building, infill development or townhouses, the maximum site coverage of the site by surface parking, accessory buildings, manoeuvring aisles, driveways, loading areas, other vehicular facilities and all principal buildings shall be 40 percent where no principal building exceeds 35 feet or 2 1/2 storeys in height, or 55 percent where no principal building exceeds 20 feet or one storey plus a cellar in height."
- 4.8.5 - add "For an apartment building, infill development or townhouses, in the case of a sloping site where a structure is located in or beneath a yard, the structure shall be excluded from the site coverage calculation provided that it does not, except for required earth cover, permitted fences and similar items, project above the average elevation of the portions of the streets, lanes or sites located adjacent to such structure, and does not, in any event, project more than 3 feet above the actual elevation of adjoining streets, lanes and sites."
- 4.10 - add "Horizontal Angle of Daylight for Apartment Buildings, Infill Development and Townhouses"
- 4.10.1 - add "Where a habitable room has a window in any interior side yard, any window facing the side property line shall be located at least 10 feet from that property line."
- 4.10.2 - add "All residential buildings shall be sited so that a plane formed by an angle of 50 degrees, or two angles with a sum of 70 degrees, extended horizontally from the midpoint of every window referred to in section 4.10.1 and measured at sill level, shall be unobstructed over a distance of 80 feet."



Appendix 8 (Cont'd)

- 4.10.3 - add "For the purpose of section 4.10.2 the following shall be considered as obstructions:
- (a) the theoretically equivalent buildings located on any adjoining sites in any R district in a corresponding position by rotating the plot plan of the proposed building 180 degrees about a horizontal axis located on the property lines of the proposed site;
  - (b) part of the same building, including permitted projections;
  - (c) the maximum size building permitted under the appropriate C or M District Schedule if the site adjoins a C or M site."
- 4.10.4 - add "Where a window is greater in area than the minimum required under the Building By-Law, the above conditions may be tested against the least restrictive portion of the window equal in area to the required minimum."
- 4.10.5 - add "For the purpose of section 4.10.1, a bathroom or kitchen shall not be considered as a habitable room unless its area is greater than 10 percent of the total floor area of its dwelling unit, or 70 square feet, whichever is the greater."
- 5.2 - add "Relaxation of Regulations
- The Development Permit Board or the Director of Planning, as the case may be, may relax the yard provisions of Sections 4.5.3 of this Schedule in the case of infill development provided that:
- (a) he first has regard to applicable guidelines or policies which City Council may, from time to time, determine; and
  - (b) the relaxation facilitates an overall better relationship of the infill development with the existing buildings on the development site and abutting sites."

## Ludwig, Nicole

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Tuesday, June 21, 2016 10:16 AM  
**To:** Public Hearing  
**Subject:** FW: REZONING: 3365 Commercial Drive and 1695-1775 East 18th Avenue

**Categories:** Green Category

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**From:** Jacky Leung **s.22(1) Personal and Confidential**  
**Sent:** Monday, June 20, 2016 11:25 PM  
**To:** Correspondence Group, City Clerk's Office  
**Subject:** REZONING: 3365 Commercial Drive and 1695-1775 East 18th Avenue

Dear Mayor and Councils,

I am writing in oppose the rezoning project of 3365 Commercial drive and 1695-1775 18<sup>th</sup> Avenue.

1. The proposed structure is 6 stories high and is too tall and does not fit into the character of the neighborhood with houses. There are also enough townhouses and condos around the area creating too much structure and high-rises in the area.
2. Parking is already an issue in the neighborhood and the proposal is not going to relieve the parking issue, but instead will make the issue worse as there are only 81 parking stalls for a 114 units.
3. A large amount of green space will be removed, which included mature trees and a small stream bed.
4. Due to Commercial drive being main artery traffic is busy and there are a lot of cars passing by. The number 20 bus also runs down Commercial drive and due to increased townhouses and condos in the area, there are more people taking the 20 bus. Thus, the 20 bus quite often is full and will just pass by the bus stop.
5. The location of the parking ramp off East 18<sup>th</sup> will add to the congestion that already exists in the area. There is already a high congestion in the area of East 18<sup>th</sup> with traffic from nearby schools and church.  
In consideration for all the above reasons, I strongly hope and request that you oppose to this proposal for rezoning in this area.

Yours sincerely

Jacky Leung

## Ludwig, Nicole

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Tuesday, June 21, 2016 10:15 AM  
**To:** Public Hearing  
**Subject:** FW: zoning and development by-law-Public Hearing June 23rd

**Categories:** Green Category

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**From:** Shirley Chin s.22(1) Personal and Confidential  
**Sent:** Monday, June 20, 2016 10:02 PM  
**To:** Correspondence Group, City Clerk's Office  
**Subject:** zoning and development by-law-Public Hearing June 23rd

Dear Council

Let's keep the integrity and character of our neighborhood intact. The area at 3365 Commercial Drive and 1695-1775 East 18 Ave is and should remain a RS-2(one family dwelling). We don't need cookie cutter rental units that will become the new "Vancouver Special" in East Vancouver. In addition, what will become of the added traffic congestion in an increasingly "popular" area?

I and along with many say **NO** to the CD-1 District proposal.

Thank you.  
Shirl C.

## Ludwig, Nicole

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Tuesday, June 21, 2016 10:14 AM  
**To:** Public Hearing  
**Subject:** FW: Public hearing June 23rd re: 3365 Commercial Dr and 1695 to 1775 East 18th

**Categories:** Green Category

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**From:** M S [REDACTED] s.22(1) Personal and Confidential  
**Sent:** Monday, June 20, 2016 9:25 PM  
**To:** Correspondence Group, City Clerk's Office  
**Cc:** cclerk@vancouver.ca  
**Subject:** Public hearing June 23rd re: 3365 Commercial Dr and 1695 to 1775 East 18th

I would like to voice my concern about the rezoning.  
We are apposed to this.  
No need to remove all the beautiful mature trees.  
6 storeys is too high.  
Congestion and not enough street parking to accommodate these new homes.  
No ramp off 18th.

Regards,

Ida and Tony Liguori

[REDACTED] s.22(1) Personal and Confidential

## Ludwig, Nicole

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**From:** s.22(1) Personal and Confidential  
**Sent:** Tuesday, June 21, 2016 11:30 PM  
**To:** Correspondence Group, City Clerk's Office  
**Cc:** CCAN; s.22(1) Personal and Confidential Robertson, Gregor; Ball, Elizabeth; De Genova, Melissa; Jang, Kerry; Public Hearing; Meggs, Geoff; Stevenson, Tim; Reimer, Andrea; Louie, Raymond; Deal, Heather; Carr, Adriane; Affleck, George; Adrian.Dix.MLA@leg.bc.ca; melanie.mark.mla@leg.bc.ca; don.davies@parl.gc.ca; Correspondence Group, City Clerk's Office  
**Subject:** 3365 Commercial Drive and 1695 to 1775 East 18th Avenue PUBLIC HEARING  
**Attachments:** NEB pipeline process a 'sham,' new Liberal plan not much better, Vancouver mayor says - Politics - CBC News.pdf; concept drawing representing what CCAN members suggested at a CCAN meeting - 18th and Commercial project; Tenant alleges harassment by Cressey \_ Cedar Cottage Area Neighbours.pdf

Mayor and Councillors,

This is a follow up from the original submission sent on this topic. The comments remain the same and there are other concerns.

First, I have noticed that East 18th Avenue itself has become a virtual highway. I was nearly rear ended by someone speeding today rushing from Knight to Commercial. This increased traffic is the result of the the demands placed on our road (East 18th) by these development projects. Why are you not addressing the traffic and the problems that it has created? The increased traffic and risk of accident is the city's responsibility. Please address.

Second, I wish to note my observations and interactions with councillor reimer and stevenson. Both of who while provided limited feedback and response. I am quite disheartened that they have not done their duty in advocating for the resident's position on this topic. The neighbourhood does not want this development as it current exists to proceed. Why are councillors not heeding these concerns, but Vision Vancouver preferring the money of Cressey, Bosa, Wall, and Aquilini? (donations to your party). The comments of Heather Deal are instructive in this regard, as she is voting for the developers, not the residents. Why have the councillors not listed to our concerns? Why are you not voting in our interest?

Third, as you know, Britannia and Gladstone secondary schools are going to close, as well as Queen Alexandra elementary. Yet, there is density being put into these areas. The students are going to schools on the westside yet live in the east side. The developers buy land on the west side and get zoning concessions to build rental units, which they put on the east side. Our area is being punished with this inconsistent approach to development and planning and it does not make sense. We have numerous issues with crime, traffic and safety. The problems will only get worse. Please stop this development as it stands so that the land assemblies (East 18th and Knight just had two lots sold) can stop. How many more are to come?

Finally, I find it quite curious that the NPA and Green councillors left the first meeting. Why? Maybe the strategy was that they wouldn't be seen to vote against the rental project so it would not make them look bad, and they can blame it on the Vision Vancouver slate? Even George Affleck has proved voiceless, and someone who I had held in high regard, has also shown a curious lack of engagement. It is clear that this project will be approved, even though no one agrees to it in our area. This is how much the developers have a hold of city hall. What a shameful process, and system that we live in, that the mighty dollar comes before community concerns.

Please confirm receipt of this email.

s.22(1) Personal and Confidential

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**To:** "Correspondence Group, City Clerk's Office" <ccclerk@vancouver.ca>

Cc: **s.22(1) Personal and Confidential** <gregor.robertson@vancouver.ca>, <CLRball@vancouver.ca>, <CLRdegenova@vancouver.ca>, <CLRjang@vancouver.ca>, <publichearing@vancouver.ca>, <CLRMeggs@vancouver.ca>, <CLRstevenson@vancouver.ca>, <CLRreimer@vancouver.ca>, <CLRlouie@vancouver.ca>, <CLRdeal@vancouver.ca>, <CLRCarr@vancouver.ca>, <CLRaffleck@vancouver.ca>, "Dix.MLA, Adrian" <Adrian.Dix.MLA@leg.bc.ca>, <melanie.mark.mla@leg.bc.ca>, "Don Davies, MP" <don.davies@parl.gc.ca>, <mayorandcouncil@vancouver.ca>

**Subject:** Re: 3365 Commercial Drive and 1695 to 1775 East 18th Avenue PUBLIC HEARING

Dear Mayor Robertson,

I wanted to follow up on this and add an additional point to my letter as it relates to another development and how it links to the Cressey Development. I have noticed the large church facility on East 18th and Knight (Vancouver Chinese Alliance Church (3330 Knight St) has a development application board out front. This appears to be a change in use from a church to a school, whether or temporary or not, it needs to be determined. You may not be aware, but this church facility is effectively a 24/7 operation in practice, and the indications of its calendar are noted as having a very high use. <http://vcac.bc.ca/kse/calendar.html>

Over the last few years, the services this church provides has only increased, resulting in undue demand on the neighbouring streets. I have not had an opportunity to take photographs of every night of the week, but I would request that your city planning & parking department perform a study on the parking use and undue demands (including garbage & litter) that the Saturday, Sunday, Tuesday, Thursday services (and more) place on the area and document the use through photographs to demonstrate my point (undue high use). Upon speaking with the management at the church, the response was that the street on East 18th is unrestricted, yet these same constituent users of the church have no obligation or commitment to our area (except for a once a year "amusement fair"). In practice, while there is near zero engagement with the residents, the high use of the facility and its nearly thousands of weekly users has resulted in the situation where longtime residents (wheelchairs, canes, elderly, ESL, strollers, etc) cannot find parking on their street or have the quiet enjoyment of their property. In contrast, the very same church has placed signage, fence, and orange pylons blocking all others from using their facility out front on knight street or its campus grounds, and the usage of their facility (while a private ground) is not permitted with very close monitoring of the premises by a security camera system. This is the introduction of residents to this facility.

#### **Why is this relevant to the Cressey Application?**

First, there is a real concern that the planning application for the "Vancouver Christian School" (to be located at the Vancouver Chinese Alliance Church) appears to temporarily move from its school location near the PNE to here, has not been fully informed or engaged with the residents. Already having a school in the area (Tye Elementary), and putting in additional facilities in place with the church will now make this street (E 18th) a 7-day-a-week operation with excessive and undue demands on the residents from a large influx of further individuals temporarily there, but with no other investment or engagement with our area. Quiet enjoyment and peaceful use is important to longtime residents; parking, garbage, congestion, and the friction created without any real constituent interface is not only wrong with such high usage, it must be addressed. Why is zoning change even being considered when there is no consultation? Please therefore, add these comments to this church's development application as an objection to the rezoning, until the matter has been fully discussed and residents engaged. City planning and change-in-use must not occur in secret, or in a vacuum, without longtime resident input.

In fact, this is the same type of secret change in use that is occurring, from the perception of longtime residents, with the Cressey development, which leads to my second point. The Cressey Development on East 18th at Commercial Drive, will now place additional number of residents within the other side of East 18th at commercial near the 1700 block. Since the development of the "Mercer" project by Cressey (his most recent venture in the area among many others), there has been a noticeable increase on East 18th (the only direct through-road from Kingsway down to East 12th on Knight street) of traffic. Effectively, East 18th avenue from 1400 block to 1700 block has become a highway with vehicle speeding from Knight all the way to Commercial drive (putting to risk longtime seniors, disabled, and small kids in a single family neighbourhood now at risk of traffic hazards).

This effective change in use from a community street to a “highway” has in addition to the congestion from the Vancouver Chinese Alliance Church, will place additional undue demands and safety risks to the residents. This is how the Cressey development is relevant to all residents along East 18th and side streets — the residents are being pushed in at both sides but with no resulting constituent or resident consolation, other than a paper-based process that appears to have little weight with council. Yet, Cressey seems to have conveniently left out realistic increased demands on East 18th from a high density project in a single family neighbourhood and the ensuing demands and problems it creates from the congestion. Sadly, I fear the problem will continue with this developer: public reports of the questionable behaviour by Cressey show how unscrupulous practices are endemic to the Porter development, which was a similar rental project. Cressey is trying to manufacture fake public support for this project, under question circumstances, and I wonder if there are other methods that they have used (under duress to residents of Porter?) to gain public support under alleged questionable pretences. Example below:

<https://ccan2013.wordpress.com/2016/05/13/tenant-alleges-harassment-by-cressey/>

The woman who came with him asked our friend to fill out a Survey which asked all kinds of questions, but seemed to be biased towards saying how good and affordable the Porter suites are. He was suspicious and asked what this survey had to do with preventive maintenance, and who hired them to ask people to fill out the form. She finally admitted that she had been hired by Cressey to interview all the residents and get them to fill out the form. *It had nothing to do with safety, and everything to do with getting residents to state that they were satisfied with living in “affordable housing”. Our friend said he did not think that \$1,300:00 was really affordable for the small studio suite (490 sq ft) that he lives in. He has also been asked to pay \$100:00 a month for parking on top of his current rent. Then, in the elevator in each building there is a poster from Cressey suggesting to the residents that they go to attend the meeting at City Hall on May 24th to state how good it is to live in the current Cressey building at Porter. This is manipulation, and using the Residential Tenancy Act to pretend to review safety procedures, but was really all about gaining support for Cressey to build the next building at 18th and Commercial.*

In fact, my own interaction with Scott Cressey at the open house held at the Croatian Cultural Centre, was equally troubling. During numerous resident observations and discussions at the “mock up” of this project, a man in a salt-and-pepper hair started to be quite difficult with those present who questioned his project becoming defensive and hostile. He would not initially identify himself, but aggressiveness indicated that he had to ‘feed his kids’ ... He then stated that he was ‘owner of this project’ and stormed off commenting about affordability for his kids. This was the odd introduction, to residents, of Scott Cressey. I noticed as well, the concerns for this company (Cressey developments and related companies) appear to be consistent in the interactions with the management of this company. Example excerpts below, as a highlight of the observations of others.

<http://www.complaintsboard.com/complaints/nacel-properties-cressey-development-vancouver-british-columbia-c466806.html>

**This property management and construction company is criminal. They are very careful about hiding their name on rental listings, and I've talked to half a dozen building managers who've said they've heard nothing but bad things.**

<http://www.complaintboard.com/nacel-properties-l1836.html>

**"I can write with some authority that this is beyond a doubt the worst company to rent from (or work for). I worked for Cressey Development Corp for 3 years as Norm Cressey's assistant (sct'y). He is a foul tempered man who subjects his employees to Dickensian abuse. He adores his high end condo development company (CDC) and uses his slummy property management company (Nacel) as leverage for the (generally) numbered companies he uses to do his developments under. I put up with 3 years of being yelled at, called names and listened to awful abuse that he heaped onto his property managers and other employees. Screaming, throwing of things and verb abuse were not uncommon."**

**Does City Hall even care about this type of interaction with residents?** It seems that the developers have the inside track at City Hall. Case in point, Normal Cressey though this company has donated \$19,500 to Vision Vancouver during the last city election. Our question — *Is this the reason why this development has been fast tracked and done, as it appears to be us, in secret?*

<http://contributions.electionsbc.gov.bc.ca/pcs/lepublished/100128335.pdf>

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2014-04-28	0862539 BC LTD   DIRECTORS: NORMAN E. CRESSEY (SOLE DIRECTOR)	555 8TH AVANUE W SUITE 200, VANCOUVER, BC V5Z 1C6
2014-04-28	0862540 BC LTD   DIRECTORS: NORMAN E. CRESSEY (SOLE DIRECTOR)	555 8TH AVANUE W SUITE 200, VANCOUVER, BC V5Z 1C6
2014-04-28	0862574 BC LTD   DIRECTORS: NORMAN E. CRESSEY (SOLE DIRECTOR)	555 8TH AVANUE W SUITE 200, VANCOUVER, BC V5Z 1C6

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Mayor Robertson, please now understand the frustration and anger that residents feels with not have our voice heard. It is a common frustration by all that the system is not fair, and 'rigged' in favour of the developers. How would you feel if this happened to you? Here are your comments on the pipeline, where you play the role of an aggrieved, and express the same frustration that we as residents do.

<http://www.cbc.ca/news/politics/neb-trans-mountain-pipeline-sham-1.3592026>

**Mayor Robertson:** "The NEB process was a sham, basically, it was advanced with gusto by the Harper government, who were obviously strong proponents of this pipeline process," Robertson said in an interview with Chris Hall on CBC Radio's The House.

**Mayor Robertson:** "We put up a solid fight against it, but many of the interveners, many voices were shut out of that process and First Nations weren't consulted appropriately," he said, noting the board did not review the project's downstream climate change impact.

Mayor Robertson, now where is our advocate in the City? Where is our voice when we need it? Why are you not objecting to this development and merely rubber stamping developer applications? (the very same developers who have given money to your party). Whose interests do you hold dear – residents (people who voted for you) or those that have donated to your party? The cedar cottage area has now had multiple changes in use, and high density that can no longer be tolerated in our area, given the issues identified. Something has to stop and it is this project, which must be dramatically scaled down. We



also ask that the road limitations be placed including perhaps making this a bicycle street like or adding road bumps and property parking restrictions to address the increased traffic demands (same as West Point Grey and its bicycle lanes that were created when you lived there).

In closing, we ask that our concerns be taken seriously and our recommendations be adopted fully. This Cressey development is not conducive to our area vision, and would set a dangerous precedent for future rental suites in city arterial streets. The developer itself has proved to be irresponsible and erratic in its interactions with residents, even going as far as creating questionable (and unethical?) questionnaires to vulnerable renters. This is a clear gaming of the system, and it appears our city council is asleep at the wheel, or even more troubling, complicit in this approach so that this sets the course for future similar development. Either way, it's a dangerous way to approach city development and ignore our concerns. Do the residents matter, or as the donations list shows, the developers? The decision on this project will tell us the result, and I hope and ask, that you heed our concerns and not of corporate connections who seem to have the ear of city hall.

Recommendations to be adopted.

1. The 4 storey apartment building on East 18th should be replaced by ground-oriented building types. Apartment buildings on East 18th don't follow City policies and should be scaled down.
2. The 6 story building is too tall as it does not fit the character of this neighbourhood with houses. Scale down development.
3. The density of 6,225 square feet (0.96 FSR) is too much at 1695 E. 18, where the house from 3365 Commercial will be moved to. A laneway infill house would only be 650 square feet here but the backyard housing proposed is 3,222 square feet. This is excessive density and should be scaled down.
4. The density of 78,278 square feet (2.71 FSR) is excessive for the 6 and 4 storey apartment buildings to be built on Commercial Dr. and on East 18th Avenue. Normal density is up to 0.75 FSR.
5. 40 trees will be cut from the site and should be mitigated.
6. 114 units and only 81 parking stalls. This will cause parking problems in the neighbourhood as already noted along with traffic congestion.
7. Parking ramp for 81 cars is on East 18th. This should be off Commercial Drive as noted for traffic issue.

Please keep my personal contact information private and confidential.

Sincerely,

s.22(1) Personal and Confidential

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From s.22(1) Personal and Confidential s.22(1) Personal and Confidential  
Date: Thursday, May 19, 2016 at 9:19 AM  
To: "Correspondence Group, City Clerk's Office" <ccclerk@vancouver.ca>  
Cc: s.22(1) Personal and Confidential <gregor.robertson@vancouver.ca>, <CLRball@vancouver.ca>, <CLRdegenova@vancouver.ca>, <CLRjiang@vancouver.ca>, <CLRmeggs@vancouver.ca>, <CLRstevenson@vancouver.ca>, <CLRreimer@vancouver.ca>, <CLRlouie@vancouver.ca>, <CLRdeal@vancouver.ca>, <CLRcarr@vancouver.ca>, <CLRaffleck@vancouver.ca>, "Dix.MLA, Adrian" <Adrian.Dix.MLA@leg.bc.ca>, <melanie.mark.mla@leg.bc.ca>, "Don Davies, MP" <don.davies@parl.gc.ca>  
Subject: FW: 3365 Commercial Drive and 1695 to 1775 East 18th Avenue PUBLIC HEARING

Dear Mayor & Councillors,

I have realized that the closure of public comment in writing was May 18, 2016; however, this was not visible on the City public notices, which provide information on speaking, but not writing. Please consider this email as on time, as I was unable to respond earlier due to injuries I sustained from an accident, and would request your cooperation in including this

correspondence as an objective to this project. I have also written earlier correspondence, which I would like to add, as that we sent in on time, and voices similar concerns to object to this development.

The Cedar Cottage Area Neighbours has been working on providing our input to this project for the last several months, and would like to comment that the density component of this project by the Cressey Group go against the use, designs & neighbourhood characteristics of Cedar Cottage. Specifically, the following:

1. The 4 storey apartment building on East 18th should be replaced by ground-oriented building types. Apartment buildings on East 18th don't follow City policies.
2. The 6 story building is too tall as it does not fit the character of this neighbourhood with houses.
3. The density of 6,225 square feet (0.96 FSR) is too much at 1695 E. 18, where the house from 3365 Commercial will be moved to. A laneway infill house would only be 650 square feet here but the backyard housing proposed is 3,222 square feet. This is excessive density.
4. The density of 78,278 square feet (2.71 FSR) is excessive for the 6 and 4 storey apartment buildings to be built on Commercial Dr. and on East 18th Avenue. Normal density is up to 0.75 FSR.
5. 40 trees will be cut from the site
6. 114 units and only 81 parking stalls. This will cause parking problems in the neighbourhood.
7. Parking ramp for 81 cars is on East 18th. This should be off Commercial Drive

Having been longtime residents of this area, as well as speaking with friends, neighbours and others concerned by the highly concerning pace of this development, it is important that the city scale down the project to neighbourhood specifications. There have been significant issues with parking, overuse, and congestion, which will only get worse. As well, the approval of this project, by Cressey, will result in a precedent for future zoning on the primary street (commercial drive) and allow Cressey or others to buy up land. The question we have is – is there a wider strategy that is being implemented from which this project is the start to rezone all of the area to high density? Please be up front with us on this, as council has not allowed this matter to be proceed in a pace that this within resident limits and concerns (it's too fast, too soon, too dense). Would this project also be proceeding at such a rapid pace if the communities concerned were Kerrisdale or Shaughnessy? It seems to the neighbours that the east side is getting 'special treatment' so that all projects are put here so that the people out at Arbutus ridge can enjoy their greenway. When will council similarly invest in our concerns?

Some other concerns I wish to add are that the green space requirements in the report noting there is an abundance of "green space". This is not correct — Clark Park is not accessible due to restrictions from the hill (high road access limits) as well as the retaining wall on commercial drive. Trout Lake is not accessible due to the numerous road crossings required, and the complex labyrinth of routes required to even get to that point. This is a neighbourhood of seniors, people with wheelchairs, and recent immigrants — access to green space and amenities is a prime issues. Instead of using the green space factor as a positive, please consider how it is instead a limit — the Cressey Development should include further green space instead to develop a park.

I also wish to express my concerns about the vision vancouver political donation disclosure list. It is obvious that Cressey himself has funded vision vancouver to a significant sum and it seems to us that he has obtained significant public zoning easements for his developments. He showed up at the "town hall" in the proverbial "plaid shirt" and shorts (re Gordon Campbell) and would not identify himself to the residents there when questions were raised about the development. He was condescending, abusive, and rude to anyone who questioned his development. When pressed, he stated that he was the "owner" of the development and hesitantly said he was Cressey himself. His response – he needed to "feed his kids" and wanted to survive. It is very clear to residents that current party (Vision) has been captured by the developers, and Cressey himself it appears was able to purchase the land at this lot without much public input or real estate signage indicating it was for sale. Why? Why has this company obtained undue benefits, and preferences, in his projects in our area? (he has a significant amount in the area). The residents are interested as we are now in a situation where we provide input on pre-made decisions and not engaged with the process. When the city is pressed, we get non answers. When Cressey was questioned, he became aggressive and belligerent. Even Councillor Reimer, when pressed on this issue, refused to meet to discuss the concerns before hand. Why? Yet she is the "representative" for our area ....

Something is not right about this whole process and it seems the council is too close to the developers. Information is not being shared, and signage not put up, and decisions being made very quickly without proper input. Why?

I would be interested in your reply.

s.22(1) Personal and Confidential

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**From:** CCAN s.22(1) Personal and Confidential  
**Date:** Monday, May 9, 2016 at 10:31 PM  
**To:** <Undisclosed-Recipient:>  
**Subject:** 3365 Commercial Drive and 1695 to 1775 East 18th Avenue PUBLIC HEARING

Hi all CCAN members

**PUBLIC HEARING for 3365 Commercial Drive and 1695 to 1775 East 18th Avenue**

**MAY 24, 2016 at 6:00 pm**

**City Hall 453 West 12<sup>th</sup> Avenue**

**Email, write letters, attend the hearing, speak to City Council**

**Ask City Council to oppose this rezoning**

**Here are the reasons:**

1. The 4 storey apartment building on East 18th should be replaced by ground-oriented building types. Apartment buildings on East 18<sup>th</sup> don't follow City policies.
2. The 6 story building is too tall as it does not fit the character of this neighbourhood with houses.
3. The density of 6,225 square feet (0.96 FSR) is too much at 1695 E. 18, where the house from 3365 Commercial will be moved to. A laneway infill house would only be 650 square feet here but the backyard housing proposed is 3,222 square feet. This is excessive density.
4. The density of 78,278 square feet (2.71 FSR) is excessive for the 6 and 4 storey apartment buildings to be built on Commercial Dr. and on East 18<sup>th</sup> Avenue. Normal density is up to 0.75 FSR.
5. 40 trees will be cut from the site
6. 114 units and only 81 parking stalls. This will cause parking problems in the neighbourhood.
7. Parking ramp for 81 cars is on East 18<sup>th</sup>. This should be off Commercial Drive

More information below

**Signing up to speak**

To speak at this Public Hearing contact City Hall from Friday, May 13, 2016 to Tuesday, May 24, 2016. Here is how:

To be added to the speakers list for the agenda item 3365 Commercial Drive and 1695 to 1775 East 18<sup>th</sup> Avenue email [publichearing@vancouver.ca](mailto:publichearing@vancouver.ca) or call 604-829-4238. Ask them to tell you what speaker number you will be on the list.

**Just before the meeting**, you can also sign up in person, up to 10 minutes before the meeting begins.

**After all speakers on the list have spoken**, the Mayor will ask if there is anyone else who has not spoken and would like to speak now, if so please come forward.

**Once the meeting starts** on May 24 at 6:00 pm you can view it online at [vancouver.ca/councilvideo](http://vancouver.ca/councilvideo) so that you can see when your speaker number is coming up.

Be prepared, the hearing could go on for several days depending on the number of speakers and the number of other agenda items.

### **Don't want to speak, but want your views heard?**

If you don't wish to speak to City Council but still want to share your views, send an email or a letter. Deliver your letter to the City Clerk's Office at least three days before the meeting so it can be shared with elected officials on time. It should be sent to [mayorandcouncil@vancouver.ca](mailto:mayorandcouncil@vancouver.ca) by 5pm, on May 18 and cc the City Clerk.

The following are the individual email addresses of the Mayor and City Council. Emails sent directly to each Councillor should be sent a few days before the Public Hearing date in order to give Councillors time to read and review your information.

- City Clerk's Email: [ccclerk@vancouver.ca](mailto:ccclerk@vancouver.ca)
- Mail: 3rd Floor, City Hall, 453 W 12th Avenue, Vancouver, BC, V5Y 1V4
- Mayor Robertson [gregor.robertson@vancouver.ca](mailto:gregor.robertson@vancouver.ca)
- Elizabeth Ball [CLRball@vancouver.ca](mailto:CLRball@vancouver.ca)
- Melissa De Genova [CLRdegenova@vancouver.ca](mailto:CLRdegenova@vancouver.ca)
- Kerry Jang [CLRjang@vancouver.ca](mailto:CLRjang@vancouver.ca)
- Geoff Meggs [CLRmeggs@vancouver.ca](mailto:CLRmeggs@vancouver.ca)
- Tim Stevenson [CLRstevenson@vancouver.ca](mailto:CLRstevenson@vancouver.ca)
- Andrea Reimer [CLRreimer@vancouver.ca](mailto:CLRreimer@vancouver.ca)
- Raymond Louie [CLRlouie@vancouver.ca](mailto:CLRlouie@vancouver.ca)
- Heather Deal [CLRdeal@vancouver.ca](mailto:CLRdeal@vancouver.ca)
- Adriane Carr [CLRcarr@vancouver.ca](mailto:CLRcarr@vancouver.ca)
- George Affleck [CLRaffleck@vancouver.ca](mailto:CLRaffleck@vancouver.ca)

**Report to Council** <http://council.vancouver.ca/20160419/documents/p4.pdf>

**The proposal** <http://former.vancouver.ca/commsvcs/planning/rezoning/applications/3365commercial/index.htm>

If you can flyer the neighbourhood about this Public Hearing please contact CCAN. There are 97 of us in CCAN, if everyone could speak and bring one more person we can make a difference.

Cheers, Grace

## NEB pipeline process a 'sham,' new Liberal plan not much better, Vancouver mayor says

Trans Mountain pipeline could put tens of thousands of jobs in jeopardy, Gregor Robertson says

By John Paul Tasker, [CBC News](#) Posted: May 20, 2016 8:02 PM ET Last Updated: May 20, 2016 8:42 PM ET

Vancouver Mayor Gregor Robertson says the National Energy Board's Trans Mountain pipeline review process is a "sham," and its move to green-light the major infrastructure project threatens tens of thousands of jobs in his city.

The federal energy regulator recommended — after a three-year investigation — that the controversial Kinder Morgan pipeline expansion project should be built, as long as 157 conditions are met, including 49 environmental requirements.

"The NEB process was a sham, basically, it was advanced with gusto by the Harper government, who were obviously strong proponents of this pipeline process," Robertson said in an interview with Chris Hall on CBC Radio's *The House*.


"We put up a solid fight against it, but many of the interveners, many voices were shut out of that process and First Nations weren't consulted appropriately," he said, noting the board did not review the project's downstream climate change impact.

The NEB said the \$6.8-billion project will be a boon for Canada's economy, boosting exports, employing thousands of construction workers and lining government coffers with a great deal more tax revenue.


- [Trudeau government names Trans Mountain environmental review panel](#)
- [Pipeline projects to face new environmental regulations](#)
- [First Nation band has no faith in new Kinder Morgan review panel](#)
- [Rachel Notley gets 'no clear commitment' on pipelines at federal cabinet retreat](#)


But Robertson said he will fight tooth and nail to stop the project, and he has a simple message for Prime Minister Justin Trudeau and Natural Resources Minister Jim Carr: "The answer is no. This pipeline proposal should not be approved.

"They've got the rest of this year, they've got this ministerial panel, but there is no business case for it when you put the economics on the table and when you put the Paris agreement and our climate commitments on the table and the sensitive environment we're dealing with here on the West Coast — it's an absolute no," he said.



CBC Radio's *The House*  
NEB pipeline process a 'sham,' new Liberal plan not much better, Vancouver mayor says

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The former NDP member of the legislature turned mayor said a "catastrophic" oil spill would cost the

Vancouver area some 400,000 jobs. There are more than 30,000 direct tourism jobs in his city alone — and double that number in the Metro Vancouver area — all of which could be on the line if the area's picturesque ocean environment is put in jeopardy, he said.

The pipeline will run largely alongside an existing pipeline from outside Edmonton to Burnaby, B.C., and will more than double capacity from 300,000 barrels per day to at least 890,000 barrels. Most of the new pipeline capacity will carry unrefined bitumen for export to Asian markets.

This expansion would sabotage the city's "clean and green" brand, he said, an image Robertson has worked hard to cultivate since his election in 2008. "That is all at risk if we're an oil spill city, and the images of seals and whales, swimming through oil in our harbour is unthinkable in terms what impact it would have," he said.

## 'Easy' to disappoint, Carr says


Carr and Environment Minister Catherine McKenna announced a new interim review process in January that will impose more steps on pipeline projects such as Trans Mountain.

The process will analyze greenhouse gas emissions in more detail, and include greater public and Indigenous consultation, something that's not currently part of the NEB regulatory regime. The results from the review would then be presented to cabinet, which will make the final decision on whether to approve the project by year's end.

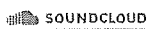
Despite the federal government's move to placate critics like Robertson, he's not exactly buying what they're selling.

"It's an acknowledgement, at least, that that process was flawed. But there needs to be more work done. It's too little too late to actually gather the appropriate evidence and consultation.

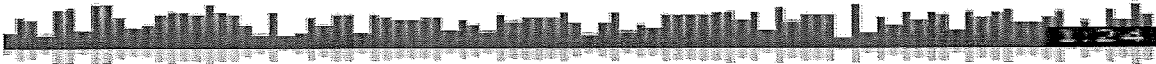
"The question is whether the three-person panel will be able to ... actually do the due diligence that's necessary to inform the decision that is going to be made later this year [by cabinet]," Robertson said. "I don't think it's a substitute for proper consultation with First Nations."



CBC Radio's *The House*  
'Absolutely not': Jim Carr says there will never be unanimity on pipelines



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But Carr is confident that the new panel will be able to adequately study the project and produce recommendations for the cabinet to consider by the panel's Nov. 1, 2016, deadline.

"What we want to know from the panellists is: What are they hearing that the NEB didn't hear, or couldn't hear, because of the nature of the regulatory review? And then we will take all of that — there's not duplication here, there's complementary work — and then ultimately we'll be held accountable for a decision," he said in an interview with *The House*.

The natural resources minister acknowledged that not all groups will be happy with the cabinet's final decision. "Will there be a consensus or unanimity? No, absolutely not," he said, noting it will be "easy" for him to disappoint people.

But the process will at least be transparent, and the panellists will more meaningfully engage with Indigenous communities along the pipeline's route, he said, something that he conceded is not adequately done by the NEB in its current form.

Some Indigenous groups along the route have already dismissed Carr's added layer of review.

"It's hard to unscramble an egg," Sundance Chief and Tseil-Waututh member Rueben George said Tuesday. "What you have is 24 months of the NEB and their processing, and now you have this new group coming in that are going to try to do what they couldn't do in 24 months, and they're going to do it in four months."

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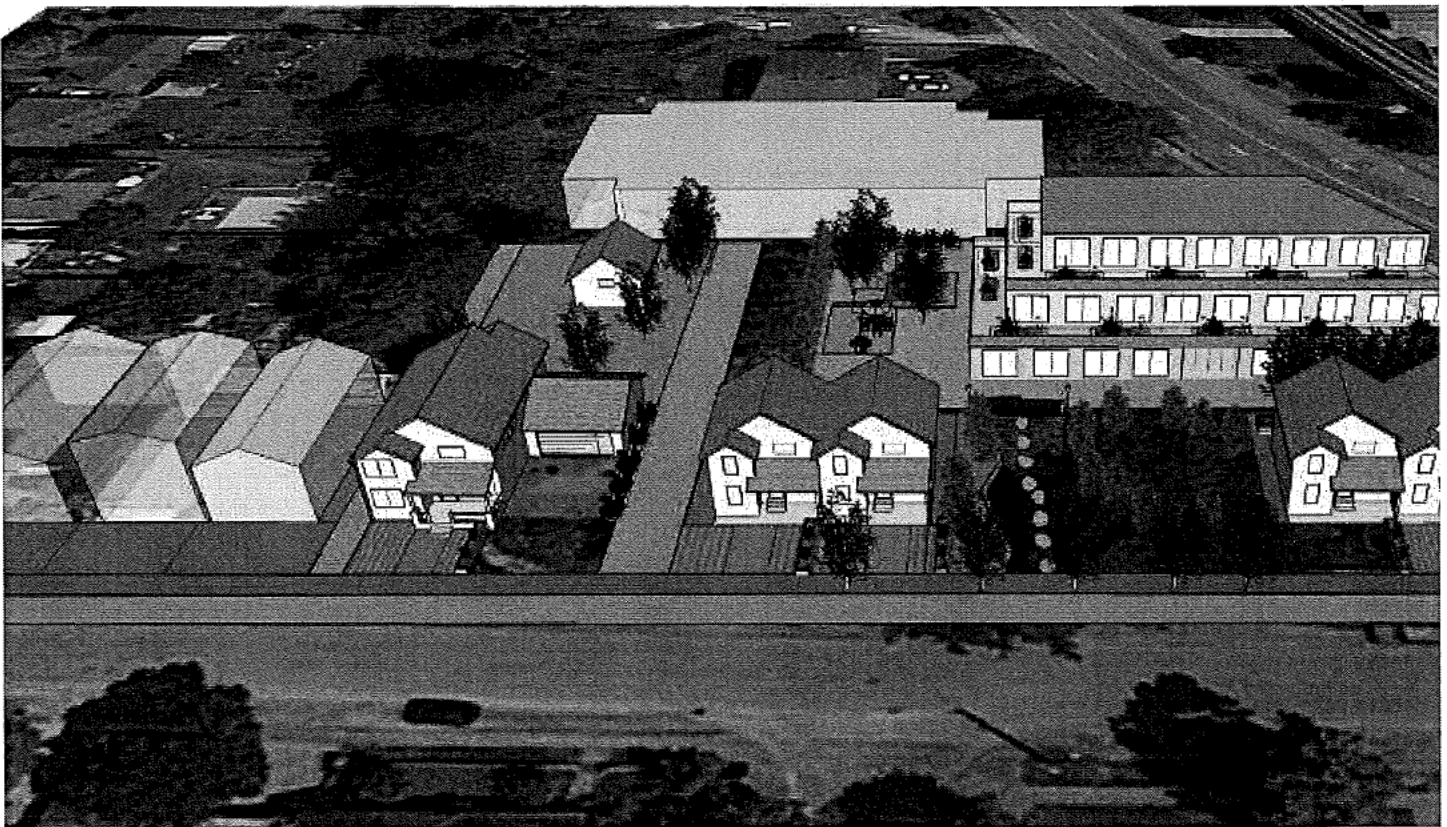
**Ludwig, Nicole**

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**From:** CCAN s.22(1) Personal and Confidential  
**Sent:** Thursday, May 19, 2016 9:59 PM  
**To:** ;  
**Subject:** concept drawing representing what CCAN members suggested at a CCAN meeting - 18th and Commercial project

Hi All CCAN members

This is one of a set of architectural renderings we had done showing a project that CCAN members thought would be more suitable at 18th and Commercial. It features a scaled down apartment building, a series of row houses and a mini-park. And a lot more trees preserved. The parking ramp for the apartment building comes off Commercial and mirrors the small-scale apartment building at 3333 Commercial. The whole set will be presented to Council at the Public Hearing.





## Cedar Cottage Area Neighbours

*Involved in our future*

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### Tenant alleges harassment by Cressey

Posted on [May 13, 2016](#)

CCAN received the following email yesterday alleging that a Cressey management company used false pretenses, claiming the need for a "preventive maintenance report" to force tenants to stay in their suites so a Cressey team could interview them. If true, we believe this constitutes an invasion of privacy and a clear abuse of their role as managers of this property. You be the judge, below is the email we received:

*My husband and I just visited a male friend who lives in the Porter Building which is managed by a company called Cascadia, which is owned by Cressey.*

*He told us a very interesting story about a recent note that was pushed under the door of each suite in his building and the other Porter building: 1888 Victoria Diversion and 3615 Victoria Drive.*

*Each resident was given a Notice of Entry, which served them 24 hrs notice so that they could enter each resident's suite to complete a "preventive maintenance report". They all HAD to be at home between 4:00pm – 8:00pm on Wednesday May 11th to meet with staff to review preventive maintenance in the buildings.*

*Two individuals came to his door and the male pushed the fire alarm system to check it worked. It took two minutes. It did work, so he did not make any other moves.*

*The woman who came with him asked our friend to fill out a Survey which asked all kinds of questions, but seemed to be biased towards saying how good and affordable the Porter suites are.*

*He was suspicious and asked what this survey had to do with preventive maintenance, and who hired them to ask people to fill out the form. She finally admitted that she had been hired by Cressey to interview all the residents and get them to fill out the form.*

*It had nothing to do with safety, and everything to do with getting residents to state that they were satisfied with living in "affordable housing". Our friend said he did not think that \$1,300:00 was really affordable for the small studio suite (490 sq ft) that he lives in. He has also been asked to pay \$100:00 a month for parking on top of his current rent.*

*Then, in the elevator in each building there is a poster from Cressey suggesting to the residents that they go to attend the meeting at City Hall on May 24th to state how good it is to live in the current Cressey building at Porter.*

*This is manipulation, and using the Residential Tenancy Act to pretend to review safety procedures, but was really all about gaining support for Cressey to build the next building at 18th and Commercial.*

*It is very important that City Hall know what is happening here.*

*<name withheld by request>*

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Follow

Update: We met a couple today in front of The Porter who told us the very same story. T they were being pushed into saying that their rent was "affordable" when they don't thin

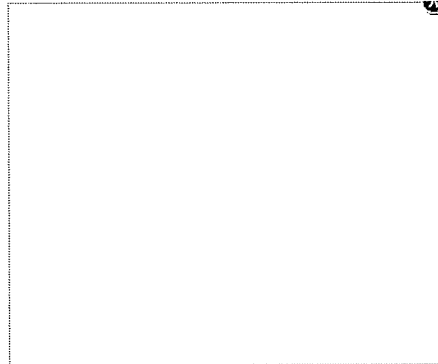
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Cedar Cottage Area Neighbours

The Twenty Ten Theme. Blog at WordPress.com.

**Ludwig, Nicole**

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Wednesday, June 22, 2016 9:56 AM  
**To:** Public Hearing  
**Subject:** FW: REZONING: 3365 Commercial Drive and 1695-1775 East 18th Avenue

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**From:** Brenda Lau **s.22(1) Personal and Confidential**  
**Sent:** Tuesday, June 21, 2016 7:06 PM  
**To:** Correspondence Group, City Clerk's Office  
**Subject:** REZONING: 3365 Commercial Drive and 1695-1775 East 18th Avenue

Dear Mayor and Councils,

I oppose this rezoning application and request that you oppose this proposal for the following reasons below:

1. Parking around this neighborhood is already difficult as there are many condos and townhouses nearby. Thus, increases the amount of cars parked on the streets due to over population in the area. During worship days, which are between 3-4 days per week, a lot of cars are parked around the neighborhood and illegally parked in areas of permit parking and in front of fire hydrants.
2. Traffic around this neighborhood is already congested as there are 2 churches and 2 schools nearby.
3. There are not as many mature trees in this neighborhood other than the area of proposal. Therefore, rezoning in that area will cause loss of many mature trees, green space, and a small stream bed.
4. Community services do not have enough resources to support more population in the area.

In conclusion, I strongly oppose to this rezoning application and ask that this proposal be opposed.

Sincerely,

Brenda Lau

## Ludwig, Nicole

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Wednesday, June 22, 2016 9:56 AM  
**To:** Public Hearing  
**Subject:** FW: Public Hearing 3365 Commercial Drive, 1695 to 1775 East 18th

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**From:** Pippa Lubensky s.22(1) Personal and Confidential  
**Sent:** Wednesday, June 22, 2016 9:15 AM  
**To:** Correspondence Group, City Clerk's Office  
**Subject:** Public Hearing 3365 Commercial Drive, 1695 to 1775 East 18th

Hello,

I have been a resident of the Cedar Cottage neighborhood since 2008, living one block away from the proposed development. I agree with the city's strategy to increase density, the housing situation in Vancouver is desperate!

However, the project in question is too big considering it's surrounding neighborhood. Why not downsize it to the recommendations of the Urban Design Panel? I support their proposal which is

1. turn the four storey building into two sets of two storey townhouses because "this four storey building is the neighbour to the neighbourhood and that you really have to have a good look at that".
2. for the height of the six storey building on Commercial Drive, the City should take its cue for the height from Commercial Drive at 16th, 15th and 14th.
3. this project is in a transition area, a border position with a very committed neighbourhood and that needs to be respected with the architecture
4. that the four and six storey buildings are institutional and out of step with the neighbourhood.
5. the setbacks need to be larger
6. that the heritage house and infill is way too crowded and that it needs more space and breathing room around it.

I am not in favor of preserving the heritage house, it doesn't make the deal sweeter to preserve a house of questionable heritage value. More green space, less crowding is much preferred.

Thanks for considering!

Pippa Lubensky

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**Ludwig, Nicole**

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Wednesday, June 22, 2016 10:04 AM  
**To:** Public Hearing  
**Subject:** FW: REZONING: 3365 Commercial Drive and 1695-1775 East 18th Avenue

**From:** jieming liao s.22(1) Personal and Confidential  
**Sent:** Tuesday, June 21, 2016 7:13 PM  
**To:** Correspondence Group, City Clerk's Office  
**Subject:** REZONING: 3365 Commercial Drive and 1695-1775 East 18th Avenue

To Mayor and Councils,

I would like to oppose to this rezoning request on 3365 Commercial Drive and 1695-1775 East 18<sup>th</sup> Avenue.

The reasons why I oppose to this proposal is due to the following reasons. Loss of green space in the neighborhood as the proposed area contains a density of green space and mature trees. Rezoning this area will destroy the green space and mature trees in the area. Parking has also been a huge issue in this neighborhood as all the streets around East 18<sup>th</sup> Avenue are full of parked cars. There are also cars from neighboring commercial business parked in the neighborhood and tenants of houses around the neighborhood parked on the streets as well. Finally, this is a high-density neighborhood where there are churches, schools, and commercial business nearby. There are also townhouses and condos just one or two blocks off of 18<sup>th</sup> Avenue, which increases in the density of population in the area. There are more cars driving and parked on the streets.

Please oppose this rezoning application.

Thank you

May Liao

## Ludwig, Nicole

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**From:** Correspondence Group, City Clerk's Office  
**Sent:** Wednesday, June 22, 2016 11:31 AM  
**To:** Public Hearing  
**Subject:** FW: Cressey Development Proposal at 18th Av/Commercial Drive

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**From:** Evangeline Carr **s.22(1) Personal and Confidential**  
**Sent:** Wednesday, June 22, 2016 11:10 AM  
**To:** Correspondence Group, City Clerk's Office  
**Subject:** Cressey Development Proposal at 18th Av/Commercial Drive

Mayor Robertson and Council

I am a resident of the **s.22(1) Personal and Confidential** Several weeks ago two Cressey representatives gained access to the building by way of using the building manager to force the residents to be home between certain hours so that the suites could be given 'preventative maintenance' attention. I opened my door to these reps. and there was no 'preventative maintenance' at all but I was asked to fill out a survey for Cressey which was geared towards giving support to their new development a block away. I was really annoyed and pointed out to them that the rent was not affordable nor was the \$100 underground parking fee acceptable in a supposed 'affordable housing' building. They were pushy and didn't accept that what I was saying was relevant and they kept pushing that it was indeed affordable.

Yesterday I was approached in my hallway my two more Cressey reps. who again were trying to gain support from the residents for the new development. I found this to be disrespectful and bullying. Why are they being allowed in a private residential building to push their agenda. Who are these people and just how desperate are they? I think that you know.

Please do not allow this development by Cressey. They do not care about we, who are under-paid and struggling. I pay \$1300 per month for a 493 sq. foot studio. They want another \$100 per month to park my car underground. This is a huge chunk of my monthly income. It hurts.

The neighbours surrounding these buildings are complaining that they are being squeezed by we, who cannot afford to park underground. A coffee shop near-by is losing business because the customers who drive there find no where to park because we are being forced to park wherever we can find a space.

I will try to attend the meeting at the hall on thursday evening. I will not speak up however, for fear that Cressey will direct Cascadia (the building management company owned by Cressey) to find means to increase my rent or just force me to move out. The last ridiculous thing I heard was that Cascadia may force bicycle owners to pay \$10 to \$20 per month more to lock them in the bike room. Do you see what these folks are up to? It's greed. They are using your 'affordable housing initiative' to further their own greedy agenda.

PLEASE STOP THEM.

And above all else, DO NOT pass my identity on to anyone connected to Cressey or Cascadia.

Thank You

E. Carr **s.22(1) Personal and Confidential**