

REFERRAL REPORT

Report Date: November 26, 2024

Contact: Jason Lui Contact No.: 604.707.5374

RTS No.: 17634 VanRIMS No.: 08-2000-20

Meeting Date: December 10, 2024

TO: Vancouver City Council

FROM: General Manager of Planning, Urban Design and Sustainability

SUBJECT: Rezoning: 2520-2544 West 16th Avenue and 3223 Larch Street

RECOMMENDATION TO REFER

THAT the rezoning application, described below, be referred to Public Hearing together with the recommendations set out below and with the recommendation of the General Manager of Planning, Urban Design and Sustainability to approve the application, subject to the conditions set out below;

FURTHER THAT the Director of Legal Services be instructed to prepare the necessary by-laws, in accordance with the recommendations set out below, for consideration at the Public Hearing.

RECOMMENDATION FOR PUBLIC HEARING

- A. THAT the application, by Strand Holdings Ltd. on behalf of:
 - Terry Atsalakis, the registered owner of 2520 West 16th Avenue
 [PID 010-802-096; Lot 7 Block 480A District Lot 526 Plan 6819];
 - Larch Street West Nominee Inc., the registered owner of 2532 West 16th Avenue [PID 008-997-870; Lot 6 Block 480A District Lot 526 Plan 6819] and 3223 Larch Street [PID 010-802-142; Lot 8 Block 480A District Lot 526 Plan 6819]; and
 - Paul Poy Hung Leong, the registered owner of 2544 West 16th Avenue
 [PID 010-802-045; Lot 5 Block 480A District Lot 526 Plan 6819];

to rezone the lands from R1-1 (Residential Inclusive) District to RR-2B (Residential Rental) District, be approved in principle;

FURTHER THAT the draft zoning amendment by-law, prepared for the Public Hearing in accordance with Appendix A, be approved in principle;

- AND FURTHER THAT the above approvals be subject to the Conditions of Approval contained in Appendix B.
- B. THAT subject to approval in principle of the rezoning and the Housing Agreement described in Part 2 of Appendix B, the Director of Legal Services be instructed to prepare the necessary Housing Agreement By-law for enactment prior to enactment of the zoning amendment by-law, subject to such terms and conditions as may be required at the discretion of the Director of Legal Services and the General Manager of Planning, Urban Design and Sustainability.
- C. THAT subject to approval of the zoning amendment by-law, the Subdivision By-law be amended generally as set out in Appendix C.
- D. THAT Recommendations A to C be adopted on the following conditions:
 - (i) THAT the passage of the above resolutions creates no legal rights for the applicant or any other person, or obligation on the part of the City; any expenditure of funds or incurring of costs is at the risk of the person making the expenditure or incurring the cost;
 - (ii) THAT any approval that may be granted following the public hearing shall not obligate the City to enact a by-law rezoning the property, and any costs incurred in fulfilling requirements imposed as a condition of rezoning are at the risk of the property owner; and
 - (iii) THAT the City and all its officials, including the Approving Officer, shall not in any way be limited or directed in the exercise of their authority or discretion, regardless of when they are called upon to exercise such authority or discretion.

REPORT SUMMARY

This report recommends an amendment to the Zoning and Development By-law from R1-1 (Residential Inclusive) District to RR-2B (Residential Rental) District, for the site located at 2520-2544 West 16th Avenue and 3223 Larch Street. The amendment would allow for a 5-storey residential rental building in accordance with the *Secured Rental Policy* (SRP). An estimated total of 92 rental units would be delivered through this application.

A future building design would be submitted through the development permit process and reviewed with the public at that time.

Staff have assessed the application and conclude that it meets the intent of the SRP. Staff recommend that the application be referred to a Public Hearing, with the recommendation of the General Manager of Planning, Urban Design and Sustainability to approve it in principle, subject to the Public Hearing, and conditions contained within Appendix B.

COUNCIL AUTHORITY/PREVIOUS DECISIONS

Vancouver Plan (2022)

- Secured Rental Policy (2012, last amended 2024)
- RR-2B District Schedule (2024)
- Residential Rental Districts Schedules Design Guidelines (2022, last amended 2024)
- Housing Vancouver Strategy (2017)
- Housing Needs Report (2022)
- Family Room: Housing Mix Policy for Rezoning Projects (2016)
- High-Density Housing for Families with Children Guidelines (1992, last amended 2022)
- Tenant Relocation and Protection Policy (2015, last amended 2019)
- Green Buildings Policy for Rezonings (2010, last amended 2023)
- Urban Forest Strategy (2014, amended 2018)
- Latecomer Policy (2021)
- Community Amenity Contributions for Rezonings (1999, amended 2024)
- Vancouver Development Cost Levy By-law No. 9755
- Vancouver Utilities Development Cost Levy By-law No. 12183

REPORT

Background/Context

1. Site and Context

The subject site (see Figure 1) is comprised of four legal parcels fronting 16th Avenue. The total site area is approximately 2,787.7 sq. m (30,006 sq. ft.), with a frontage of 61 m (200 ft.) along 16th Avenue and a depth of 45.7 m (150 ft.).

W15TH AV

C-1

RT-2

R1-1

W16TH AV

W17TH AV

V 18TH AV

W17TH AV

V 18TH AV

Site, Surrounding Zoning

2520-2544 West 16th Avenue & 3223 Larch Street

City of Vancouver

City of Vanc

Figure 1: Location Map – Site and Context

This subject site and the surrounding area are zoned for residential uses the under R1-1 District Schedule with the exception of the C-1 area to the west that allows mixed-use development with commercial and residential uses and the RT-2 area also to the west that would allow for residential uses. The site is developed with four single-detached homes constructed in 1941, 1991, and 2016. This rezoning application originally came in as three lots (2520-2532 West 16th Avenue and 3223 Larch Street); however, the applicant decided to acquire and include an

additional fourth lot (2538-2544 West 16th Avenue) into the application. The properties are not listed on the *Vancouver Heritage Register*. The subject site currently contains four rental tenancies and the tenant protection policy does not apply.

2. Policy Context

Vancouver Plan – The *Vancouver Plan* was approved by Council on July 22, 2022 and is a land use strategy to guide long-term growth of the City over the next 30 years. The approved Vancouver Plan will serve as a framework with further implementation planning work to follow over the next two to four years. The proposal addresses priorities within the *Housing Vancouver Strategy* which aligns with the Vancouver Plan.

Secured Rental Policy (SRP) – The SRP encourages the construction of new purpose-built rental housing in Vancouver. Updates to the SRP were approved by Council in December 2021 to streamline the delivery of new rental housing. These included clarifying opportunities for rezoning in low-density areas close to public transit, shopping and other daily needs, and to streamline and simplify the rezoning process by utilizing new rental zones with standardized regulations.

The SRP outlines the following locational eligibility criteria for sites in low-density areas:

- In an existing R1-1 or RT zone outside of recent community plan areas (excluding certain RT-zoned areas in Kitsilano and Kensington-Cedar Cottage with high proportions of heritage buildings and multiple conversion dwellings);
- Located within close proximity to public transit and local shopping; and
- On the first full block on either side of an eligible arterial road.

Sites that meet these criteria and that are part of the typical street grid (including having lane or secondary street access to the rear) and are regular in shape, size and other attributes may be considered for rezoning under the SRP to one of the residential rental zones. The applicable option or options are further informed by the site's size, orientation and adjacent context.

The SRP generally supports up to four-storey mixed-use and five-storey residential apartments on arterials, and up to four-storey townhouses or apartments on sites off arterials. Up to six storeys may be considered for projects on arterials where the residential component includes a minimum 20% permanently secured below-market rental housing or 100% social housing. This application complies with the location criteria under SRP for five-storey buildings.

RR Zoning District Schedules and Design Guidelines – Along with updates to the SRP, in December 2021 Council approved the addition of new residential rental ("RR") zoning district schedules to the Zoning & Development By-law: "RR-1", "RR-2A, RR-2B and RR-2C", and "RR-3A and RR-3B". Like other standard zoning districts, the RR zones set basic regulations such as permitted use, density, and height limits, while allowing for a range of building designs. All residential uses in the RR zones are secured as rental tenure, and no stratification or sale of individual residential units is allowed.

Further direction on form of development expectations under each of the RR zones is provided in the *Residential Rental Districts Schedules Design Guidelines*. Recognizing that the SRP and RR zones are intended to enable incremental change in neighbourhoods that currently consist primarily of detached houses and duplexes, the guidelines support new missing middle

buildings that foster neighbourliness and social connection, and contribute to an evolving streetscape which accommodates more architectural variety and diversity of housing options.

Housing Vancouver Strategy (2017) – Housing Vancouver focuses on the right supply of new homes, including rental, to meet the continuum of housing types. The strategy includes 10-year housing approval targets, which were updated in 2024. The new targets aim for 83,000 net new homes overall, including 35,500 purpose-built rental units. This rezoning will contribute towards targets for purpose-built market rental housing units.

Housing Needs Report (2022) – On April 27th, 2022, Council resolved at a public meeting to receive a *Housing Needs Report* (HNR) prepared by staff. Further to the BC Provincial government's requirement, Council must consider their most recent HNR when developing a development plan, or when amending a development plan in relation to Council's housing policies respecting affordable housing, rental housing and special needs housing.

This zoning amendment would facilitate the delivery of secured rental housing and address the data and findings within the HNR.

Strategic Analysis

1. Simplified Rezoning Process

To facilitate the delivery of secured rental units, the City has implemented a simplified process for rezonings to a RR District schedule. Rather than rezoning to a site-specific Comprehensive Development (CD-1) District, rezoning to a standard RR zone streamlines the review process and provides greater certainty for the achievable built form.

Under the SRP, this site is located on an eligible arterial road and is able to rezone under the RR-2A (four-storey), RR-2B (five-storey), RR-2C (six-storey with 20% of residential floor area secured as below-market rental units), RR-3A (four-storey mixed use) and RR-3B (six-storey with 20% of residential floor area secured as below-market rental units with mixed use) zones. This site is eligible for a mixed-use development. Out of the eligible options, the applicant has chosen to rezone to RR-2B.

The RR-2B District Schedule permits rental buildings up to five-storeys in height and 2.20 FSR. This zoning requires a minimum frontage of 20.1 m (66 ft.). On some shallow sites and corner sites with a minimum frontage of 40.2 m (132 ft.), a density of up to 2.40 applies for sites on arterials. The zoning also requires 35% of the units to be for families and include two bedrooms or more. Applicable to sites on arterials and on local streets flanking an arterial, five-storey apartment buildings will introduce incremental change to local streets and will typically be limited in frontage width to achieve a higher degree of compatibility with the existing streetscape.

The rezoning process allows for a secured rental development through a streamlined process. Architectural drawings are not required at the rezoning application stage. The form of development will be reviewed at the development permit stage. All proposals will need to meet the intent and regulations of the RR-2B District. An Urban Design Panel review will not be required for this project at the development permit stage, as comprehensive design guidelines accompany the RR-2B District Schedule.

2. Rooftop Amenity Rooms and Decks

On July 6, 2021, Council approved changes to the Zoning and Development By-law to provide clearer regulations to better enable rooftop amenity spaces for residents of multiple dwellings. These regulations are applicable to zones citywide including RR. Common rooftop amenity rooms and access structures (elevators and stairs) contiguous with common outdoor amenity space (roof decks) may be provided under these regulations. The additional height is limited to 3.6 m and the amenity room should be stepped back significantly from building edges to minimize its appearance from ground level. An additional partial storey consisting of a rooftop amenity room, with required elevators and stairs, as well as outdoor deck space, may therefore be included with the future building proposal for this site, and will be reviewed at the development permit stage.

3. Housing

The Housing Vancouver Strategy seeks to deliver a range of housing tenures across the housing continuum. This application, if approved, would support submission of a development permit for a new five-storey rental apartment building to add to the City's inventory of rental housing, which would contribute to the targets set out in the Housing Vancouver Strategy (see Figure 2). Proposed unit numbers are not required for the simplified rezoning process but staff anticipate that this proposal could create approximately 92 rental units based on an average unit size assuming 35% will be family sized units.

Figure 2 Progress Towards 10 Year Housing Vancouver Targets (2024-2033) for Rental Housing as of June 30, 2024

Housing Type	10-Year Targets ^{1,2}	Units Approved Towards Targets³
Purpose-Built Market Rental Units	35,500	3,440 (9%)

^{1.} New 10-year targets were adopted in 2024, with tracking starting from January 1st, 2024.

Vacancy Rates – Vancouver has exhibited historically low vacancy rates in the last 30 years. In 2022, the purpose-built apartment vacancy rate was 0.8% in Vancouver. The vacancy rate (based on the CHMC Market Rental Survey) for the Westside/Kerrisdale neighbourhood, which this site is located, is 1.1%. A vacancy rate between 3% and 5% is considered to represent a balanced market.

Average Rents and Income Thresholds – Average market rents in newer rental buildings on the Westside are shown in the left-hand columns in Figure 3. The market rental housing will provide options which are significantly more affordable than average home ownership costs, as illustrated in Figure 3.

^{2.} Previous targets established in 2017 included 20,000 purpose-built rental, market and below-market combined, with tracking starting in 2017. As of December 31st, 2023, 87% of the previous targets had been reached.

^{3.} Unit numbers exclude the units in this proposal, pending council's approval of this application.

	Newer Rental Buildings – Westside		Monthly Costs of Ownership for Median- Priced Apartment – Westside (with 20% down payment)		
	Average Rent ¹	Average Household Income Served	Monthly Costs of Ownership ²	Average Household Income Served	DownPayment at 20%
Studio	\$1,902	\$76,080	\$2,837	\$113,480	\$106,000
1-bed	\$2,306	\$92,240	\$3,473	\$138,920	\$132,000
2-bed	\$3,372	\$134,880	\$5,193	\$207,720	\$198,400
3-bed	\$4,434	\$177,360	\$7,982	\$319,280	\$311,890

Figure 3: Market Rents in Newer Westside Buildings, Cost of Ownership and Household Income Served

Security of Tenure – Purpose-built rental housing offers secure rental tenure. The proposed RR-2B zoning designation would only permit residential uses that are secured as residential rental tenure, and no strata or other ownership tenure would be permitted. In addition, all units in the project would be secured through a Housing Agreement and a Section 219 Covenant for the longer of 60 years and the life of the building. Covenants will be registered on title to prohibit the stratification and/or separate sale of individual units. Conditions related to securing the units are contained in Appendix B.

Tenants – The rezoning site contains existing rental residential uses, including one unit of secondary rental housing. However there are no eligible tenants as defined under the City's *Tenant Relocation and Protection Policy* (TRPP). All residential tenancies are protected under the provincial Residential Tenancy Act.

If any eligible tenants are identified through the City's regulatory approvals process, the applicant will be required to provide a Tenant Relocation Plan (TRP) that meets the City's TRPP.

4. Transportation and Parking

Parking, loading and bicycle spaces must be provided and maintained according to the Parking By-law and will be reviewed at time of development permit application when architectural drawings are submitted. Local servicing requirements will be secured through a services agreement. Engineering conditions are included in Appendix B.

Through this application, conditions of approval include provisions for intersection improvements at Larch Street and West 16th Avenue, curb ramps, enhanced street lighting and sidewalk upgrades as well as the installation of a new rectangular rapid flashing beacon (RRFB) crosswalk at the intersection. Lane improvements adjacent to the site are also anticipated.

^{1.} Data from the October 2023 CMHC Rental Market Survey for apartments in purpose-built rental buildings completed in the year 2014 or later on the Westside of Vancouver

^{2.} Based on the following assumptions: median of all BC Assessment apartment sales prices in Vancouver Westside in 2021 by unit type, 20% down payment, 5% mortgage rate (in-line with Bank of Canada conventional rate), 25-year amortization, \$150-\$250 monthly strata fees and monthly property taxes at \$2.92 per \$1,000 of assessed value (2020 assessments and property tax rate).

5. Environmental Sustainability and Natural Assets

Green Buildings – The *Green Buildings Policy for Rezonings* requires that rezoning applications satisfy the green and resilient building conditions stated within the Policy. The applicant has committed to submitting Reporting of Green and Resilient Building Measures at the building permit stage, as well as fulfilling energy system sub-metering and enhanced commissioning requirements throughout the project.

Green Assets – The *Urban Forest Strategy* was developed to preserve, protect and strengthen Vancouver's urban forest and tree canopy for the future. The Protection of Trees By-law aims to maintain a healthy urban forest by requiring that permission be granted to remove trees that meet certain conditions. The intent is to protect as many healthy, viable trees as possible, while still meeting the challenges of development, housing priorities and densification. This is in keeping with City goals for resilient and healthy natural systems in urban areas.

A detailed tree assessment and retention report will be required as part of a subsequent development permit application. Staff will review these materials and provide conditions to retain and protect trees, wherever possible. This process allows for a coordinated assessment of tree retention and replacement with the proposed form of development.

6. Public Input

A rezoning information sign was installed on the site on January 26, 2024, the sign was subsequently updated on August 8, 2024. Approximately 526 notification postcards were distributed within the neighbouring area on or about February 7, 2024. An additional 526 notification postcards were distributed on July 31, 2024 to notify neighbours of the inclusion of the additional lot. Notification, application information, and an online comment form was provided on the Shape Your City Vancouver website (https://shapeyourcity.ca/).

For a more detailed summary of public comments and the SRP consultation process and background, see Appendix D.

Question and Answer Period – A question and answer period was conducted from February 7 to February 20, 2024, on the Shape Your City platform. The question and answer period consisted of an open-question online event where questions were submitted and posted with a response over a period of two weeks. A project webpage was created and 191 people signed on to view the rezoning proposal which included a hypothetical building example.

Public Response and Comments – Public input was via online questions, comment forms, by email and phone. A total of 40 submissions were received. A summary of all public responses may be found in Appendix D.

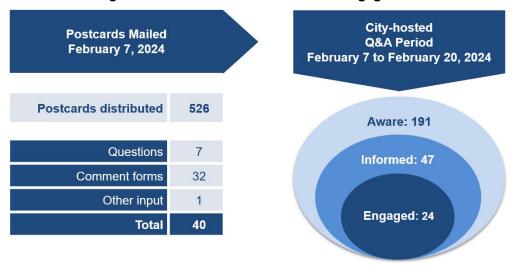


Figure 4: Overview of Notification and Engagement

Generally, comments of support fell within the following areas:

- **Height, massing, density, location:** The height, massing, use, and density proposed at this location is appropriate.
- Housing choices: Increasing the supply of available housing stock in the city is much needed especially on the westside of the city.

Generally, comments of concern fell within the following areas:

- **Height, massing, density, location, and design:** The proposed height is not suitable for a single-family neighbourhood as it would cause shadowing and obstruction of views. This type of building typology is out of character for this neighbourhood.
- Traffic and parking: Increased density will cause an influx of traffic onto West 16th Avenue and will also result in the loss of existing street parking.

Response to Public Comments

<u>Height, massing, density, location, and design:</u> The proposed use and form of development is consistent with the SRP. Rezoning conditions have been included to further enhance the design of the building, and the interface with the surrounding area. If the rezoning is approved, detailed architectural drawings will be submitted through the development process and reviewed with the public at that time.

<u>Traffic and parking:</u> Engineering staff have reviewed the proposed development for transportation safety issues and included rezoning conditions to deliver improvements that will address safety for all road users. Provisions for the installation of parking regulatory signage on streets adjacent to the site are proposed. Additionally, the proposal will need to meet the Parking By-law.

7. Public Benefits

Community Amenity Contributions (CAC) – The *Community Amenity Contributions Policy for Rezonings* provides an exemption for certain routine, lower-density rental rezoning applications that comply with the City's rental policies. As this site is currently zoned R1-1 and proposes to rezone to RR-2B which allows for up to five storeys, the application is eligible for this CAC exemption.

Development Cost Levies (DCLs) – This site is currently subject to both City-wide and Utilities DCL. DCLs are payable at building permit issuance based on rates in effect at that time and the floor area proposed at the development permit stage.

This application was eligible for a waiver of the City-wide DCLs, however the applicant has elected not to seek the waiver. As per Section 3.1B of the Vancouver Development Cost Levy By-law, the decision to seek the waiver is made at the rezoning application stage. Should the applicant wish to request a DCL waiver at a later stage, the application would be expected to return to Council for a subsequent public hearing to amend the rezoning conditions.

Based on the rates in effect as of September 30, 2024 and proposed 6,690.5 sq.m (72,014 sq.ft) of floor area, it is estimated that the project will pay \$2,766,522 of DCLs, should it achieve the maximum 2.40 FSR.

Public Art Program – No public art contribution is applicable to this rezoning as the proposed floor area is below the minimum threshold.

Other Benefits – The rental housing in this proposed development will contribute to the City's rental housing stock.

A summary of public benefits associated with this application can be found in Appendix E.

FINANCIAL IMPLICATIONS

As noted in the Public Benefits section this project is expected to provide rental housing and a DCL contribution. See Appendix E for additional details.

CONCLUSION

Staff have reviewed the application to rezone 2520-2544 West 16th Avenue and 3223 Larch Street from R1-1 to RR-2B to facilitate the delivery of secured rental housing. The location complies with the provisions of the RR-2B District Schedule, and staff conclude the zoning amendment can be considered as it is consistent with the *Secured Rental Policy* and advances the City's housing policy goals.

The General Manager of Planning, Urban Design and Sustainability recommends that the rezoning application be referred to a Public Hearing with a recommendation that, subject to the Public Hearing, the rezoning application be approved in principle, subject to the applicant fulfilling the Conditions of Approval in Appendix B.

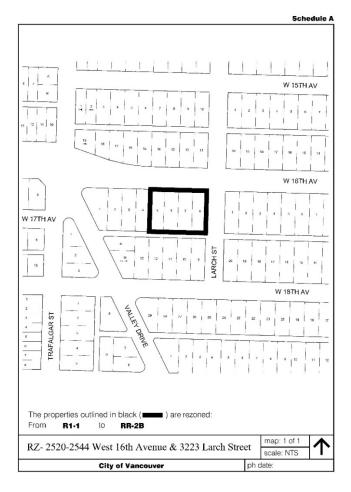
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2520-2544 WEST 16TH AVENUE AND 3223 LARCH STREET PROPOSED BY-LAW AMENDMENTS

Note: A By-law to rezone an area to RR-2B will be prepared generally in accordance with the provisions listed below, subject to change and refinement prior to posting.

Zoning District Plan Amendment

- 1. This by-law amends the indicated provisions or schedules of the Zoning and Development By-law No. 3575.
- This by-law amends the Zoning District Plan attached as Schedule D to By-law No. 3575, and amends or substitutes the boundaries and districts shown on it, according to the amendments, substitutions, explanatory legends, notations, and references shown on the plan attached as Schedule A to this by-law, and incorporates Schedule A into Schedule D of By-law No. 3575.
- 3. The area shown within the heavy black outline on Schedule A is rezoned and moved from the R1-1 district to the RR-2B district.



* * * * *

2520-2544 WEST 16TH AVENUE AND 3223 LARCH STREET CONDITIONS OF APPROVAL

Note: If the application is referred to a Public Hearing, these Conditions of Approval will be referenced in the Summary and Recommendations included in the hearing agenda package. Any changes to the conditions approved by Council will be contained in its decision. Applicants are advised to consult the Public Hearing minutes for any changes or additions to these conditions.

PART 1: CONDITIONS OF APPROVAL OF THE DEVELOPMENT APPLICATION

THAT, in reviewing a development application for the site, the Director of Planning shall have particular regard for the following:

Engineering

1.1 Provision of construction details to determine ability to meet municipal design standards for shotcrete removal (City of Vancouver Design Guidelines, Construction Standards and Encroachment By-law (#4243) section 3A) and access around existing and future utilities adjacent your site prior to building permit issuance if shotcrete is required for the site.

Note to Applicant: Current construction practices regarding shotcrete shoring removals have put City utilities at risk during removal of encroaching portions of the shoring systems. Detailed confirmations of these commitments will be sought at the building permit stage with final design achievements certified and confirmed with survey and photographic evidence of removals and protection of adjacent utilities prior to Occupancy Permit issuance. Please contact Engineering Services at shoringreview@vancouver.ca for details.

https://vancouver.ca/streets-transportation/street-design-construction-resources.aspx

https://vancouver.ca/home-property-development/construction-street-use-permits.aspx#shoring-and-excavation

1.2 The owner or representative is to contact Engineering Services at StreetUseReview@vancouver.ca to acquire the project's permissible street use after building permit issuance.

Note to Applicant: Prepare a mitigation plan to minimize street use during excavation & construction (i.e., consideration to the building design or sourcing adjacent private property to construct from) and be aware that a minimum 60-day lead time is required for any major crane erection / removal or slab pour that requires additional street use beyond the already identified project street use permissions.

https://vancouver.ca/home-property-development/construction-street-use-permits.aspx

1.3 Provision of any gas service to connect directly to the building without any portion of the service connection above grade within the road right-of-way.

- 1.4 Provision of a lighting simulation to support all offsite lighting upgrades to City standards and IESNA recommendations.
- 1.5 Door swings are not to exceed more than 0.3m (1ft.) over the property lines.
- 1.6 Submission to Engineering of an updated landscape plan reflecting all the public realm changes, including demonstration of:
 - (a) display of the following note(s):
 - (i) "This plan is "NOT FOR CONSTRUCTION" and is to be submitted for review to Engineering Services a minimum of 8 weeks prior to the start of any construction proposed for public property. No work on public property may begin until such plans receive "For Construction" approval and related permits are issued. Please contact Engineering, Development and Major Projects and/or your Engineering, Building Site Inspector for details."
 - (ii) "Tree species, final spacing, quantity and location to the satisfaction of the General Manager of Engineering Services. New trees must be of good standard, minimum 6cm caliper, and installed with approved root barriers, tree guards and appropriate soil volumes. Installation of Engineered Soil may be required to obtain appropriate soil volumes based on site conditions. Root barriers shall be of rigid construction, 8 feet long and 18 inches deep, centre on each street tree adjacent to the sidewalk and any off-street bike facility. Planting depth of root ball must be below sidewalk grade. Contact Park Board at pbdevelopment.trees@vancouver.ca for inspection after tree planting completion".
 - (iii) "Off-site assets are to be constructed to the satisfaction of the General Manager of Engineering Services and as per the approved City geometric design, with the final design and location to be determined once the City geometric is received."

Note to Applicant: Drawings submitted as part of the development permit application will be preliminary with appropriate placeholders, and the final off-site geometric design will be provided by the City of Vancouver. An Engineering Project Coordinator will engage the Developer to facilitate the delivery of any City design after development permit issuance.

- (b) existing locations of:
 - (i) street furniture; and

Note to Applicant: For drawings with existing street furniture displayed, a note must be added stating:

"All removals, relocations, reinstallations and replacements of street furniture must be carried out by the City Street Furniture Contractor in coordination with the City Street Furniture Coordinator."

(c) poles and guy wires.

Note to Applicant: Poles and guywires that are to be removed or relocated must be called out and the existing and proposed locations shown.

(d) streetscape designed in compliance with the "All other City areas" Streetscape Design Guidelines.

Note to Applicant: Where a design detail is not available, make note of the improvement on the plan. Public realm changes include all off-site improvements sought for this rezoning. The Streets Design Guidelines are viewable online at https://vancouver.ca/streets-transportation/streetscape-design-guidelines.aspx and are to be used alongside the City design guidelines and construction standards.

- 1.7 Update the architectural plans to provide:
 - (a) all types of parking, loading, bicycle, end-of-trip facilities and passenger loading spaces individually numbered, and labelled on the drawings;
 - (b) dimension of columns and column encroachments into parking spaces;
 - (c) identification of columns in the parking layouts;
 - (d) section drawings showing elevations and minimum vertical clearances for parking levels, loading bays, ramps, and to the underside of raised security gates considering mechanical projections and built obstructions:
 - (e) ramp/parkade warning and/or signal systems details, including: locations of lights, signs and detection devices; and
 - (f) design elevations at all breakpoints on both sides of ramps, drive aisles, loading and passenger loading spaces, accessible spaces, and entrances.
- 1.8 Provision of on-site rainwater management in accordance with Building By-law requirements (Book II, Division B, Article 2.4.2.5) in effect in January 2024.

Note to Applicant: The applicant will be required to demonstrate compliance with these requirements at the building permit application stage. See vancouver.ca/rainwater for more information.

- 1.9 Provision of the Developer's Engineer is to submit a sewer abandonment plan that details the following:
 - (a) The abandonment or removal of all existing storm, sanitary, and combined connections to the development site; and
 - (b) The abandonment or removal of all existing storm, sanitary, and combined sewer mains that are no longer in use due to the development of the site.

Note to Applicant: The abandonment plan is required to be reviewed and accepted by the City Engineer prior to issuance of the sewer permit.

1.10 Provision of all third-party utility services (e.g., BC Hydro, Telus, and Shaw) to be underground, BC Hydro service to the site to be primary, and all required electrical plants to be provided within private property.

Note to Applicant: BC Hydro System Vista, Vista switchgear, pad mounted transformers, low profile transformers and kiosks as well as telecommunications kiosks are to be located on private property with no reliance on public property for placement of these features.

For questions on this requirement, please contact Utilities Management Branch at 604-829-9447 or at umb@vancouver.ca.

- 1.11 A Key Plan shall be submitted by the applicant and approved by the City prior to any third-party utility drawing submissions, and third-party utility service drawings will not be reviewed by the City until the Key Plan is defined and achieves the following objectives:
 - (a) The Key Plan shall meet the specifications in the City of Vancouver Engineering Design Manual Section 2.4.4 Key Plan https://vancouver.ca/files/cov/engineering-design-manual.PDF; and
 - (b) All third-party service lines to the development are to be shown on the plan (e.g., BC Hydro, TELUS, and Shaw, etc.) and the applicant is to provide documented acceptance from the third-party utilities prior to submitting to the City.

Note to Applicant: It is highly recommended that the applicant submits a Key Plan to the City for review as part of the Building Permit application.

Use of street for temporary power (e.g., temporary pole, pole mounted transformer or ducting) is to be coordinated with the city well in advanced of construction. Requests will be reviewed on a case- by-case basis with justification provided substantiating need of street space against other alternatives. If street use for temporary power is not approved, alternate means of providing power will need to be proposed. An electrical permit will be required.

https://vancouver.ca/files/cov/Kev%20Plan%20Process%20and%20Requirements.pdf

1.12 Show all City supplied building grades (BGs) and entranceway design elevations (DEs) on the architectural and landscape plans, while ensuring any topographic survey used for design purposes is derived from a benchmark with elevations consistent with those denoted on the City issued building grade plan.

Note to Applicant: When providing additional property line elevations for proposed entrances, interpolate a continuous grade between the elevations provided on the City supplied building grade plan.

For more information, please contact Engineering, Streets Design Branch at building.grades@vancouver.ca or call 604-871-6373.

https://vancouver.ca/home-property-development/building-grades-for-sidewalk-and-street-elevation.aspx.

Sustainability

1.13 All new buildings in the development will meet the requirements of the *Green Buildings Policy for Rezonings* (amended July 25, 2023) located here

https://guidelines.vancouver.ca/policy-green-buildings-for-rezonings.pdf

Note to Applicant: Refer to the most recent bulletin *Green Buildings Policy for Rezonings – Process and Requirements*.

Housing

- 1.14 The unit mix to be included in the development permit drawings must include a minimum of 35% family units (two bedroom and three-bedroom units).
- 1.15 The development should be designed in accordance with the *High-Density Housing for Families with Children Guidelines*, including the provision of:
 - (a) An outdoor amenity area to include areas suitable for a range of children's play activities and urban agriculture, appropriate in size for the scale of the project and situated to maximize sunlight access (S. 3.3.2, 3.4.3);
 - (b) a minimum of 2.3 sq. m (24.7 sq. ft.) of bulk storage for each dwelling unit (S. 4.4.2);
 - (c) a multi-purpose indoor amenity space at least 37 sq. m (398 sq. ft.) with a wheelchair accessible washroom and kitchenette. Consider positioning this adjacent to the children's play area to enable parental supervision from the amenity room (S. 3.7.3); and
 - (d) a balcony for each unit with 1.8 by 2.7 m minimum dimensions (S. 4.3.2).

PART 2: CONDITIONS OF BY-LAW ENACTMENT

THAT, prior to enactment of the amending By-law, the registered owner shall on terms and conditions satisfactory to the Director of Legal Services, the General Manager of Planning, Urban Design and Sustainability, and the General Manager of Engineering Services (or successors in function), as necessary, and at the sole cost and expense of the owner/developer, make arrangements for the following:

Engineering

- 2.1 Make arrangements to the satisfaction of the General Manager of Engineering Services and the Director of Legal Services for consolidation of Lots 5, 6, 7 and 8, Block 480A, District Lot 526, Plan 6819 to create a single parcel.
- 2.2 Provision of a Services Agreement to detail the on- and off-site works and services necessary or incidental to the servicing of the Rezoning Site (collectively called the "Services") such that they are designed, constructed, and installed at no cost to the City

and all necessary street dedications and rights-of-way for the Services are provided all to the satisfaction of the General Manager of Engineering Services. No development permit for the Rezoning Site, or any portion thereof, or for any building or improvements thereon will be issued until the letter of credit, as security for the Services, is provided. The timing for the delivery of the Services shall be determined by the General Manager of Engineering Services in his sole discretion and holds shall be placed on such permits as deemed necessary in his sole discretion. Except as explicitly provided for in Condition 2.3, the Services are not excess and/or extended services and the applicant is not entitled to a Latecomer Agreement.

Note to Applicant: For general Latecomer Policy information refer to the website at https://vancouver.ca/home-property-development/latecomer-policy.aspx#redirect

(a) Provision of adequate water service to meet the domestic and fire flow demands of the project.

Note to Applicant: Based on the confirmed Fire Underwriter's Survey Required Fire Flows and domestic flows submitted by Aplin Martin dated June 13, 2024, no water main upgrades are required to service the development.

The main servicing the proposed development is 450mm. The maximum water service connection size is 450 mm.

Should the development's Fire Underwriter's Survey Required Fire Flow calculation change as the building design progresses, a resubmission to the City of Vancouver Waterworks Engineer is required for re-evaluation of the Water System.

- (b) Provision of adequate sewer (storm and sanitary) service to meet the demands of the project, and to maintain acceptable sewer flow conditions, implementation of development(s) at 2560-2532 West 16th Avenue & 3223 Larch Street require local servicing upgrade to:
 - (i) separate 72.9 m of existing 250 mm COMB main in West 16th Avenue to 375 mm STM and 250 mm SAN in West 16th Avenue from MH_FJCTYC fronting 3223 Larch Street to MH_FJCTYD fronting 2556 West 16th Avenue.

Note to Applicant: The lengths and diameters of these improvements are approximate and subject to detailed design by Developer's Engineer.

Developer's Engineer to submit sewer design brief, calculations and/or model, and design drawings to the City. All submittals, including Issued for Construction (IFC) drawings, are required to be reviewed and accepted by the City Engineer prior to Building Permit issuance.

The development is to be serviced to the proposed 375 mm storm sewer and proposed 250mm sanitary sewer in West 16th Avenue.

These works constitute excess and/or extended services and will be subject to a latecomer agreement, to the satisfaction of the General Manager of Engineering Services and the Director of Legal Services.

- (c) Provision of street improvements with appropriate transitions, along Larch Street. adjacent to the site, including:
 - (i) 2.1 m wide broom finish saw-cut concrete sidewalk;
 - (ii) curb and gutter, including road reconstruction as required to accommodate the new curb and gutter;

Note to Applicant: Road reconstruction on Larch Street to meet City "Higher-Zoned Street" pavement standards.

- (iii) removal of existing retaining wall encroachment from the City boulevard;
- (iv) 50 mm depth mill and inlay, from the new curb to the centerline along site's frontage; and
- (v) curb ramps

Note to Applicant: The Streets Design Guidelines are viewable online at https://vancouver.ca/streets-transportation/streetscape-design-guidelines.aspx and are to be used alongside the City design guidelines and construction standards. Confirm if your site is within a Streetscape Design Guideline area and follow the applicable guidelines.

- (d) Provision of street improvements with appropriate transitions, along West 16th Avenue adjacent to the site, including:
 - (i) 2.4 m wide broom finish saw-cut concrete sidewalk; and
 - (ii) curb ramps.

Note to Applicant: The Streets Design Guidelines are viewable online at https://vancouver.ca/streets-transportation/streetscape-design-guidelines.aspx and are to be used alongside the City design guidelines and construction standards. Confirm if your site is within a Streetscape Design Guideline area and follow the applicable guidelines.

- (e) Provision of lane improvements with appropriate transitions, along the lane adjacent to the site, including:
 - (i) full depth pavement reconstruction; and

Note to Applicant: Lane reconstruction to meet City higher-zoned lane standards.

(ii) new standard concrete lane crossing, with new lane returns and ramps on both sides, at the lane entrance on Larch Street.

Note to Applicant: concrete lane crossing to include minimum 50mm mill and pave around the lane crossing where the existing asphalt surface has deteriorated.

Note to Applicant: Refer to the City design guidelines and construction standards.

https://vancouver.ca/streets-transportation/street-design-construction-resources.aspx

- (f) Provision of speed humps in the lane south of West 16th Avenue between Larch Street and Valley Drive.
- (g) Provision of improvements at the intersection of Larch Street and West 16th Avenue including:
 - (i) design and installation of a new RRFB (rectangular rapid flashing beacon) crosswalk and any required associated works;
 - (ii) double bulges, extending along West 16th Ave. at the crossing location;
 - (iii) curb ramps;
 - (iv) entire intersection street lighting upgrade to current City standards and IESNA recommendations; and
 - (v) new electrical service cabinet/kiosk on Larch Street for Larch Street/West 16th Avenue.

Note to Applicant: The kiosk shall be fed by BC Hydro underground grid. As such, a right-of-way (ROW) space shall be provided on-site to accommodate BC Hydro pad mounted transformer.

Note to Applicant: These works constitute excess and/or extended services and will be subject to a latecomer agreement, to the satisfaction of the General Manager of Engineering Services and the Director of Legal Services.

Note to Applicant: City of Vancouver to provide approved Geometric design. All elements of the Geometric design must be constructed to meet City Standards including, but not limited to relocation of existing catch basins or installation of new catch basins where required to accommodate the geometric design.

- (h) Provision of upgraded street lighting (roadway and sidewalk) and existing lane lighting to current City standards and IESNA recommendations.
- (i) Provision of new or replacement duct banks that meet current City standard.

Note to Applicant: Duct banks are to consist of electrical, communication ducts and cables, and connect to existing electrical and communication infrastructure.

(j) Provision of lane lighting on standalone poles with underground ducts if BC Hydro poles with attached City lane lights are planned to be removed; and

Note to Applicant: The ducts must be connected to the existing City street lighting grid.

Note to Applicant: A Development and Major Projects construction coordinator will contact the Applicant in the development permit stage and coordinate the submission of the detailed electrical design. The detailed electrical design is required prior to the start of any associated electrical work and is to conform with the current City Engineering Design Manual, Construction Specifications, Standard Detail Drawing, Canadian Electrical Code, and the Master Municipal Construction Documents.

(k) Provision of street trees where space permits.

Note to Applicant: Final spacing, quantity and location to the satisfaction of the General Manager of Engineering Services. Tree species to the approval of the City Arborist. Street tree planting to include appropriate soil volumes and approved root barriers of rigid construction, 8' long and 18" deep, centre on each street tree adjacent to the sidewalk and any off-street bike facility. Installation of Engineered Soil under new sidewalks may be required to obtain appropriate soil volumes based on site conditions.

- (I) Provision of the installation of parking regulatory signage on streets adjacent to the site, to the satisfaction of the General Manager of Engineering Services.
- 2.3 Provision of one or more Latecomer Agreements to the satisfaction of the General Manager of Engineering Services and the Director of Legal Services for the following works, which constitute excess and/or extended services:
 - (a) Sewer local servicing upgrades per condition 2.2 b.
 - (b) Improvements at the intersection of Larch Street and West 16th Avenue per condition 2.2 g.

Note to Applicant: The benefiting area for these works is under review.

Note to Applicant: An administrative recovery charge will be required from the applicant in order to settle the latecomer agreement. The amount, which will be commensurate with the costs incurred by the City to administer the latecomer scheme, will be provided by the City and specified in the latecomer agreement.

For general Latecomer Policy information refer to the website at https://vancouver.ca/home-property-development/latecomer-policy.aspx#redirect

Housing

2.4 Make arrangements to the satisfaction of the General Manager of Planning, Urban Design and Sustainability and the Director of Legal Services to enter into a Housing Agreement and a Section 219 Covenant to secure all residential units as rental housing units, excluding Seniors Supportive or Assisted Housing, pursuant to the *City's Secured Rental Policy*, for a term equal to the longer of 60 years and the life of the building, subject to a no-separate-sales covenant and a no-stratification covenant, and such other terms and conditions as the General Manager of Planning, Urban Design and Sustainability and the Director of Legal Services may require.

Note to Applicant: This condition will be secured by a Housing Agreement to be entered into by the City at by-law enactment pursuant to Section 565.2 of the Vancouver Charter and a Section 219 Covenant.

Environmental Contamination

2.5 As applicable:

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

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

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

The preceding agreements shall provide security to the City including indemnities, warranties, equitable charges, letters of credit and withholding of permits, as deemed necessary by and in a form satisfactory to the Director of Legal Services. The timing of all required payments, if any,

shall be determined by the appropriate City official having responsibility for each particular agreement, who may consult other City officials and City Council.

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2520-2544 WEST 16TH AVENUE AND 3223 LARCH STREET DRAFT CONSEQUENTIAL AMENDMENT

DRAFT AMENDMENT TO THE SUBDIVISION BY-LAW NO. 5208

Council amends Schedule A of the Subdivision By-law in accordance with the plan labelled Schedule A and attached to and forming part of this by-law, by deleting the following properties from the R1-1 maps forming part of Schedule A of the Subdivision By-law:

- (a) PID: 010-802-096; Lot 7 Block 480A District Lot 526 Plan 6819;
- (b) PID: 008-997-870; Lot 6 Block 480A District Lot 526 Plan 6819;
- (c) PID: 010-802-045; Lot 5 Block 480A District Lot 526 Plan 6819; and
- (d) PID: 010-802-142; Lot 8 Block 480A District Lot 526 Plan 6819.

2520-2544 WEST 16TH AVENUE AND 3223 LARCH STREET PUBLIC CONSULTATION SUMMARY

1. Background of SRP Consultation

A review of the City's previous rental incentive programs began in late 2018 and led to an updated Secured Rental Policy in November 2019. In that initial round of work, two in-person public open houses were held, pedestrian intercept surveys were undertaken and a Talk Vancouver survey was available, in addition to stakeholder and industry engagement and a survey of residents living in buildings created through City incentive programs. In the following phases of work, between March 2020 and August 2021, City of Vancouver staff engaged residents through in-person and online virtual information sessions, surveys, and stakeholder engagement meetings. This process included six in-person public information sessions (attended by over 800 residents), 10 stakeholder workshops, an online comment form (400 responses received), the Shape Your City project webpage (5,000 visitors), 2 online public information sessions (102 attendees), as well as public and development industry one-on-one sessions (attended by 18 residents and 15 industry representatives).

2. List of Engagement Events, Notification, and Responses

	Date	Results	
Event			
Virtual open house (City-led)	February 7 to February 20, 2024	191 participants (aware)* • 47 informed • 24 engaged	
Public Notification			
Postcard distribution – Notice of rezoning application and virtual open house	February 7, 2024 July 31, 2024	526 526	
Public Responses			
Online questions	February 7 – February 20, 2024	7 submittals	
Online comment forms • Shape Your City platform	January 2024 – August 2024	32 submittals	
Overall position	January 2024 – August 2024	32 submittals	
Other input- email	January 2024 – August 2024	1 submittal	

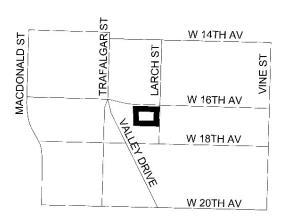
Online Engagement – Shape Your City Vancouver		
Total participants during online engagement period	January 2024 – August, 2024	711 participants (aware)* • 92 informed • 35 engaged

Note: All reported numbers above are approximate.

- * The Shape Your City platform allows staff to capture more nuanced levels of engagement associated with the rezoning application, categorized as:
 - Aware: Number of unique visitors to the application webpage that viewed only the main page.
 - **Informed**: Visitors who viewed documents or the video/photo gallery associated with the application; *informed* participants are a subset of *aware* participants.
 - **Engaged**: Visitors that submitted a comment form or asked a question; *engaged* participants are a subset of *informed* and *aware* participants.

3. Map of Notification Area





NOTIFICATION AREA

4. Analysis of All Comments Received

Below is a summary of feedback received from the public by topic.

Generally, comments of support fell within the following areas:

Height, massing, density, location: The height, massing, use, and density proposed at Generally, comments of support fell within the following areas:

- **Height, massing, density, location:** The height, massing, use, and density proposed at this location is appropriate.
- Housing choices: Increasing the supply of available housing stock in the city is much needed especially on the westside of the city.

Generally, comments of concern fell within the following areas:

- **Height, massing, density, location, and design:** The proposed height is not suitable for a single-family neighbourhood as it would cause shadowing and obstruction of views. This type of building typology is out of character for this neighbourhood.
- Traffic and parking: Increased density will cause an influx of traffic onto West 16th Avenue and will also result in the loss of existing street parking.

The following miscellaneous comments were received from the public (note: these were topics that were not ranked as highly as above).

General comments of concern:

- Rental rates are still unaffordable for a large portion of the population.
- Increased density will cause strain to existing local amenities.
- An influx of renters into the neighbourhood will cause an increase in crime and loitering.
- Construction noise will be a hinderance for the residents in the area.

Neutral comments/suggestions/recommendations:

- Proposal should be taller and denser.
- Proposal should be only three-storeys or less.
- Townhouse building form is better suited for this area.
- Should be more family sized units being built instead of one-bedroom and studios.
- Due to close proximity to transit and other amenities, number of parking should be reduced.
- Commercial on the ground floor should be considered.
- Simple rental building applications like this one shouldn't need to go through a rigorous and drawn-out rezoning process.
- More sustainable features should be considered for this site.

* * * * *

2520-2544 WEST 16TH AVENUE AND 3223 LARCH STREET PUBLIC BENEFITS SUMMARY

Project Summary

Rezoning to RR-2B District to facilitate rental housing.

Public Benefit Summary:

The project would provide rental units and would generate a DCL contribution.

	Base Zoning	Proposed Zoning
Zoning District	RR-1	RR-2B
FSR of Base Zoning and FSR of Base Density (site area = 2787.7 sq. m / 30,006 sq. ft.)	0.70	2.40
Floor Area	1,951.4 sq. m (21,004 sq. ft.)	6,690.5 sq. m (72,014 sq. ft.)
Land Use	Residential	Residential Rental

Summary of development contributions anticipated under proposed zoning

City-wide DCL ^{1,2}	\$1,700,792
Utilities DCL ¹	\$1,065,730
тот	AL \$2,766,522

Other benefits (not-quantified components): All residential units to be rental housing (non-stratified) all secured for the longer of 60 years and the life of the building.

¹ Based on by-laws in effect as of September 30, 2024 and assumes the development maximizes the allowable density. DCLs are payable at building permit issuance based on rates in effect at that time and the floor area proposed at the development permit stage. DCL by-laws are subject to future adjustment by Council including annual inflationary adjustments. A development may qualify for 12 months of in-stream rate protection. See the City's DCL Bulletin for more details.

² This application is eligible for a waiver of the City-wide DCL, however the applicant has elected not to seek the waiver. As per Section 3.1B of the Vancouver Development Cost Levy By-law, the applicant's decision regarding the waiver for projects requiring rezoning is to be made at the rezoning application stage and the relevant requirements should be secured in the conditions of enactment. Should the applicant wish to request a DCL waiver at a later stage, the application would be expected to return to Council for a subsequent public hearing to amend the rezoning condition.

2520-2544 WEST 16TH AVENUE AND 3223 LARCH STREET APPLICANT, PROPERTY, AND DEVELOPMENT PROPOSAL INFORMATION

Property Information

Address	Property Identifier (PID)	Legal Description
2520 West 16th Avenue	010-802-096	Lot 7 Block 480A District Lot 526 Plan 6819
2532 West 16th Avenue	008-997-870	Lot 6 Block 480A District Lot 526 Plan 6819
2544 West 16th Avenue	010-802-045	Lot 5 Block 480A District Lot 526 Plan 6819
3223 Larch Street	010-802-142	Lot 8 Block 480A District Lot 526 Plan 6819

Applicant Information

Architect/Applicant	Strand Holdings Ltd.
Property Owners	Terry Atsalakis; Larch Street West Nominee Inc.; Paul Poy Hung Leong;

Site Statistics

Development Statistics

	Permitted Under Existing Zoning	Development Permitted Under Proposed Zoning	
Zoning	RR-1	RR-2B	
Uses	Residential	Residential Rental	
Maximum Density	0.70 FSR	Up to 2.40 FSR	
Floor Area	1,951.4 sq. m (21,004 sq. ft.)	Up to 6,690.5 sq. m (72,014 sq. ft.)	
Height	10.7 m (35.1 ft.)	Up to 5 storeys (at the street): 16.8 m (55 ft.)	
Unit Mix	n/a	as per RR-2B District	
Parking, Loading and Bicycle Spaces	as per Parking By-law	as per Parking By-law	
Natural Assets	To be assessed at the development permit stage		