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City of Richmond 6911 No 3 Road, Richmond BC V6Y 2C1 Attention Mr. F. C. Lin Transportation Dep't. 11 March 2006

Dear Sirs,

West Cambie Area Development Plan

With reference to the above and following the Public hearing last Thursday, as part of the open and transparent procedures, it was agreed that you would make available for my review the data upon which you have based the calculations and recommendations with reference the road and transportation infrastructure contained within this development area and its interface with the arterial road system surrounding the area along with interface with the public transportation systems.

Please provide this as soon as possible so we may review and further comment upon all the design and interpreted standards that have been applied to this area.

You may contact me at 604 240 1030, or fax @ 1 250 558 4529 or alternatively at the E mail address shown above.

As I indicated at the meeting following our initial review we have concerns with reference the proposed Local Area Development Plan as it currently stands in both the methodology and recommendations.

After receipt of our review we are confident that you will see minor modification to the current proposal, which in our opinion would create a superior and more equitable solution for both current residents, future residents and the Richmond Community at large.

This Area Development Plan is a once in a lifetime opportunity, not only for Richmond, but for all Municipalities in BC to establish a plan and template which can truly be called an integrated one, so the importance of getting this right and setting the standards for future is of the highest priority.

Current areas of concern

- 1. Transportation infrastructure
 - a. You indicated that no official traffic study has been carried out for the development. Is one proposed?

All other Municipalities that have undertaken local area development plans have executed a detailed traffic study as an essential element of the basic infrastructure design, since this is fundamental along with engineering and municipal works.

This study needs to not only reflect the current day standards, but

- 1. the projected reduction in private vehicle usage,
- 2. size of vehicles,
- 3. the numbers of vehicles per family,
- 4. the aging demographics of the local population,
- 5. the social economic grouping of families moving into the area.,
- 6. special requirements for school users and other commercial spaces,

● Page 2 March 15, 2006

7. the effects of local transport systems (buses and RAV line connections). This study will define the real requirements both now and for the future and will be based upon today's known criteria, rather than a set of generic data which at best can be considered average and probably outdated.

b. North- South Road infrastructure.

In our opinion the north - south road locations are excessive. Consideration should be given to eliminating the proposed road section onto Cambie Road to the east of the Stolberg Street intersection (section of road approx. ½ lot depth to the west of the Islamic Center site. Also the section of road from Odlin to Cambie should be reviewed for increased capacity, to off set the above elimination.

c. The proposed additional traffic light on Cambie Road at the junction between Stolberg Street and No 4 Road would therefore be eliminated (capital cost reduction).

Also we believe that the proposed distances between the traffic lights on Cambie Road does not meet the Ministry of Transport standards for Arterial roads.

If installed, as proposed, even greater traffic congestion on Cambie Road will occur, with the effect of driving traffic through the sub division rather than using the Arterial road system on the perimeter.

d. East – West, Road structure.

The proposed realignment of existing roads and additional gateway access points appears to meet the projected traffic flows. Consideration may be required to limited left turn accessing to certain locations.

e. Access onto perimeter Arterial Roads.

The proposed elimination of driveway accesses from the perimeter arterial roads to the various sections within the subdivision will be a huge improvement to the local area.

d. Traffic calming measures.

Agreed these are essential to provide a peaceful environment which unless these are in place will result in short circuiting from major arterial road systems surrounding the area.

e. Other transportation means.

Following the meeting it was confirmed that bike path would be provided though the green spaces corridors and parks as well as on the curved pathway section. Please confirm this will remain (especially the curved walkway) since this will be located over property not owned by the City of Richmond and has to be enforced by easement.

f. Pedestrian friendly routing.

Please clarify with respect to sidewalks are interior roads proposed to have sidewalks on both sides of the street or only one side.

g. Street Parking.

Is it proposed that street parking will be permitted throughout the subdivision roads? How is it proposed to control non residential parking from immediate areas outside the subdivision (possible Wal Mart location) and commuter parking whist accessing the RAV transit line. What is the defined plan for dealing with this issue?

Page 3
March 15, 2006

To the east of the subdivision the proposed area is for townhouse type construction. Due to flood plain requirements these will probably be constructed with garages located at grade level. Other such typical subdivision within Richmond are suffering major parking issues, since owners are illegally converting garages into living accommodation and using visitor parking lots for their use.

The nett result is that public street parking around these developments is a major issue. How is it proposed to monitor and control the system?

The current inability to control this activity is a major issue and the present system is inadequately operated.

h. Sky Train interface.

With the construction of the RAV line, this sub division will be in the doughnut area highly likely to suffer localized break-ins and property damage. It is essential that all building designs allow for neighborhood views onto all public / private areas, so that self policing occurs.

What arrangements are being made with the RCMP reference local police presence etc.

2. Housing types

The area plan indicates 3 types of structure of descending height from west to east. Multi family (apartments)

The minimum height of buildings in this area will be 4 storeys on garage structure at grade. By adding the density bonus the height will either have to be increased to 6 storey or the site coverage percentage increased to 42.5%.

All structures will need to be concrete. 6 storey concrete construction is not economic, the projected costs of \$200.00 / fs is not realistic.

Site coverage of 42.5% is limiting the ability to provide adequate green space when allowing for on grade parking unless reduction of the parking requirements is planned.

Mixed use

The minimum height of buildings in this zoning will be 3 storeys. Likely to be 4 storey to accommodate residential and minimal business parking

All construction will be in concrete.

Same comments as for multi family construction reference costs.

Site coverage at 60% is high.

Anticipated that apartment style residences over 2 levels of business are likely, which will create the necessity for minimum 5 storey concrete type structures.

Multifamily (town houses)

The minimum height of buildings in this zoning will be 2 storey upon 1 level of individual parking.

Construction is likely to be traditional wood frame (Western Platform Framing).

Note concrete type construction in mid rise construction is more expensive than wood framing Consequently the ability to provide affordable housing in all but the wood framed town housing is unlikely. I would suggest that rates of \$300-\$325/ fs will apply to units at 2005 pricing levels. Financing arrangements to ensure rental rates does not exceed \$12,000 pa at these rates becomes almost impossible.

Childcare facilities.

Noted in the presentation documents is the statement that child care facilities within the area are proposed.

The principle is highly endorsed, however the feasibility and economics do not make this practical or viable.

How is City of Richmond proposing to deal with this issue?

Affordable housing

The economics of affordable housing vary depending upon many individual factors. The policy of offering affordable housing in reality is normally only lip service since in reality and with current land and construction costs the only ways to achieve affordability is to reduce unit sizes and to strip of any thing other than the basic requirements. Affordable housing has been later transferred to standard stock housing by future owners.

The only efficient and reliable method of achieving affordable housing units, which meet the needs of the financially challenged, is to operate by a Not for Profit organization and to fund from an affordable housing levy on all properties constructed.

What commitments / discussions has the City of Richmond entered into with reference this issue?

Is City of Richmond proposing operating its own affordable housing program? What will happen to the funds collected for affordable housing if no developer takes up the offer to build. There has to a commitment by the City of Richmond to utilize these funds collected for the specific purpose of providing affordable housing. These funds have to be separated into a separate account, not mixed in with general reserves.

Why not form a partnership with Not for Profit housing associations or other such organizations, fund the development through an Affordable Housing Levy, encourage all developers to construct to the maximum FAR, allocate specific land upon which to construct affordable housing units.

This way the City is assured that affordable housing is available and is truly used for those in need. This could also deal with the issue of seniors housing and housing for physically challenged persons, which are not covered under the normal development industry standards.

Seniors housing.

This issue is not addressed within the development plan, but with the location of public services and proximity of other facilities within walking distance from this subdivision, it is likely that a high proportion of potential purchasers within the area will be in this category. Although this issue is primarily one for the development industry, the City should be aware of the implications with reference providing suitable infrastructure to accommodate what is likely to become a squewed age population.

3. Green spaces

Review of the proposed green space "corridor" lots indicates these to be approx 88'-0", wide. Taking into account the side yard set backs that will be required on both adjacent lots this will increase the no build area to approx 100'.

This would appear to be excessive by comparison with other walkway locations throughout Richmond which are maximum 50'.

It is considered that the pathway corridors are over width.

• Page 5 March 15, 2006

Frozen status of green space lots.

There are lots by generation of this plan which specifically target certain lots either in their entirety or partially.

The owners of these lots need assurance in writing once the plan in its modified state is adopted, that the City will pay the full market price for their lot as if it were not designated green.

What is the City's policy with reference to lots that straddle different land use zonings (appraise at the highest land use component).

The City also should be prepared to purchase the green space lots at the latest when development commences adjacent to the lot, or at an earlier date in the event the owner wishes to move so as not to create individual hardship on these lot owners.

4. Financing issues.

a. North South road infrastructure.

The proposal put forward by Terry Crowe to recommend that the north / south road infrastructure costs, plus cost of land should be amassed and charged back to all users of land by way of local DCC is a step in the right direction. This eliminates the unfair position of certain lot owners paying in appropriate portions of the road infrastructure costs.

This proposal I think is an excellent one.

b. East West road infrastructure

Why cannot the same procedure be adopted for the East West road structure. Again here certain property owners are unfairly penalized

c. Proportional distribution.

Why would it not be possible to take all the road infrastructure costs and allocate the costs in proportion to the base FAR applicable to the area. Thus high density construction would be charged 1.5 x base, whilst town house developments would be charges 0.65 etc.

d. Perimeter road treatment.

It is our understanding from the Municipal Act that all costs associated with the Arterial Road construction / upgrade are the responsibility of the Municipality.

Why then should any of the owners within the local area improvement be required to make any contribution to these costs.

These costs should be carried entirely by the City of Richmond not funded from the local DCC's.

e. Application of Local area DCC

The local area, DCC however it is calculated should be allocated over all land owners / occupiers throughout the area. This should include the green space lots and public parks. The parkland and green space areas should not be subsidized by the local DCC

f. Application of Local area Affordable housing surcharge

The Affordable housing surcharge should be applied to all business and residential users. Not for profit, school and green space lots should be excluded from this surcharge. The current proposal of \$5.10 per square foot is inadequate to cover the costs associated with this element.

Allowing for the increased density achievable a minimum rate of \$7.60 / fs is easily achievable. I strongly advise the City to rethink its position upon this issue since even at the increased rate, the Developers will pay into a fund and proceed with the development provided work can commence in the early foreseeable future.

Anything less than \$7.60 / fs does not do justice to those in need to whom we need assist.

SUMMARY of ISSUES REQUIRING ACTION / COMMITMENT by CITY of RICHMOND, PRIOR TO PRESENTING AREA PLAN FOR FINAL PUBLIC REVIEW and COMMENT.

- 1. Provide data upon which traffic infrastructure has been calculated to writer for further review.
- 2. Undertake to carry out comprehensive traffic study by independent engineer to review all the proposals and to make recommendations upon final layout and discuss at open forum before final submission of Area development Plan.
- 3. Define the proposed detailed measures to be adopted for traffic' calming.
- 4. Undertake in writing to place easement upon lands requiring public pathways through new development to maintain walking / cycling objectives.
- 5. Define how City intends to control street parking (meters, residential parking permits, no parking zones etc). to all public roads.
- 6. Provide details of how City proposes to control illegal conversion of townhouse garages to habitable space (no tandem garages, garage doors with vision sections, separate garage blocks or exterior carports only, multi accessed communal parking structures, with habitable structures over.
- 7. Define policy parameters for security arrangements throughout area and for those special requirements due to RAV line introduction.
- 8. Provide commitment related to traffic study for alternate transportation service to local areas.
- 9. Confirm Planning dept's maximum allowance reference site coverage that will be permitted. Current standards are set too loosely.
- 10. Confirm what arrangements are being made for definitive childcare facilities, who is to provide, who will subsidize, where is facility to be located.
- 11. Confirm what definitive arrangements have been made for affordable housing operation, selection of operator, financing etc. Where is affordable housing to be situated? Assuming the construction and operation of the affordable housing society is not being completed by the developers, is City of Richmond going to provide these services now and in future years. If no affordable housing is provided, as `is likely, what is proposed will happen to the funds paid in.
- 12. Is there proposals for seniors housing / housing for physically challenged in the development plan? None will normally be provided by developers .
- 13. Undertake to review the current apparent excessive demand of over width green space corridors.
- 14. City to provide written policy reference green space lots, criteria for assessment, date of purchase, relief of person hardship for existing lot owners.
- 15. Confirm policy for the proportional distribution of infrastructure internal road, sewer, water hydro, tel improvement charges related to FAR, not lot areas. Include also green space land within distribution.

• Page 7

March 15, 2006

- 16. Confirm policy for collection of affordable housing levy, which zoning areas are excluded (institution, school, green).
- 17. confirmation City takes cost responsibility for all costs associated with the perimeter roads surrounding the development area, not to be contained within the local DCC.
- 18. Review the proposed increase in Affordable Housing levey and apply.

I trust you find these comments helpful in reviewing the modifications to the proposed plan which in essence is a major step in the direction of achieving a conceptually acceptable and sustainable subdivision development, providing opportunity to all developers and to provide both loacal area and Richmond Community something to be proud of.

Yours truly

Mike Cooper Development and Construction Manager.