AMS Submission Regarding Updates to the UBC Regional Context Statement (RCS)

This submission is made on behalf of the Alma Mater Society of UBC Vancouver in response to the public consultation being hosted by Campus and Community Planning for updating to the UBC Regional Context Statement to align with the Metro Vancouver Regional Growth Strategy – Metro Vancouver 2040 Shaping Our Future.

For clarity, the format of each section in this submission is structured as follows:
1. Reference to Metro Vancouver Regional Growth Strategy
2. Corresponding UBC Regional Context Statement Material and Land Use Plan Material (where applicable)
3. AMS commentary and suggestions

Population Count

Metro Vancouver Regional Growth Strategy
Strategy 1.1 – Contain urban development within the Urban Containment Boundary
“1.1.3.b – provide municipal population, dwelling units and employment projections”¹

UBC Regional Context Statement 2013:
“UBC’s Land Use Plan:
provides a household, population and employment forecasts to the year 2021 as follows;
• Approximately 5,700 households in Neighbourhood Housing Areas;
• Approximately 17,700 residents in Neighbourhood Housing Areas;”²

Current UBC Regional Context Statement:
“UBC’s Land Use Plan:
seeks to accommodate the following targets by 2021:
• Approximately 5,700 households in Neighbourhood Housing areas and about 10,000 student beds in academic lands;
• Approximately 22,500 residents, including 10,000 residents in student accommodation on academic lands”³

¹ Metro Vancouver, Metro Vancouver 2040 Shaping Our Future (2011) page 14
² http://www.planning.ubc.ca/vancouver_home/regional_context_statement/goal_1_-create_a_compact_urban_area.php
In the 2011 comments to UBC’s regional context statement from Metro Vancouver, there was a request made for UBC to clarify student enrolment numbers. As shown above, the current Regional Context Statement makes reference to the student housing population.

The population count cited in the 2013 Regional Context Statement materials, only accounts for anticipated population in neighbourhood housing, excluding the growing student population living on campus. With Student Housing and Hospitality Services moving toward 12 month, year round housing contracts in all new student housing developments and existing year round housing development such as Acadia Park it is not appropriate to exclude students from the population count. There are over 1,500 residents in Acadia Park Student Family Housing alone with an additional 2,114 student beds in year round (12 month) housing units. All new institutional student housing developments will be built for 12 month housing contracts. Ponderosa Commons Phase I and II will add over 1,000 more beds to that total in the next two years.

This exclusion has impacts on population based allocations of amenities including green space which are allocated on the basis of population numbers. By excluding students from the population count, the RCS is essentially exempting UBC from applying the core principles of the Metro Vancouver Regional Growth Strategy to institutional student housing developments.

**Green Space Allocations**

*Metro Vancouver Regional Growth Strategy*

*Strategy 1.2 - Focus on growth in Urban Centres and Frequent Transit Development Areas*

“Description and Land Use Characteristics – parks, greenspace and ecological areas”

and

*Strategy 4.2 - Develop healthy and complete communities with access to a range of services and amenities*

“4.2.4.d - support active living through the provision of recreation facilities, parks, trails”

*UBC Land Use Plan:*

*Usable Neighbourhood Open Space (UNOS) Section 4.1.6.3a*

“Useable neighbourhood open space for residential use including local parks, play grounds, and tennis courts will be provided based upon an area to population standard of 1.1 hectares per 1000 persons to be reduced not less than 0.5 hectares per 1000 persons based upon resident access to appropriate UBC owned open space and facilities”

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5 Acadia Park Residence – Resident Information on September 1, 2011 (snapshot) Obtained from UBC Student Housing and Hospitality Services

6 Year Round Housing Bed Count – received from Student Housing and Hospitality Services May 2, 2013


8 Metro Vancouver, "Metro Vancouver 2040 Shaping Our Future" (2011) page 19

9 *Ibid* page 47

10 UBC Land Use Plan, 2012
While UBC makes a commitment to providing up to 1.1 hectares of green space per 1000 residents, it is not clear how allocations of green space are counted. There are many athletic facilities on campus that residents do not have open access to and as such there needs to be a division between green space for university and external athletic use and municipal type green space targeted towards leisure and family usage.

The commitment to open space allocations is made only for neighbourhoods, not academic housing developments. This raises questions about how green space has and will be allocated for institutional use, especially in areas where green space is core to the community such as in Acadia Park Student Family Housing. Student families and student residents deserve and require an equal institutional commitment to green space for leisure and recreational activities. This should be reflected in the Land Use Plan to align with the Metro Vancouver guidelines for Frequent Transit Development Areas (page 19 Metro Van).

**UBC Farm**

*Metro Vancouver Regional Growth Strategy:*

*Strategy 3.2 - Protect and enhance natural feature and their connectivity*

“3.2.4 Adopt Regional Context Statements which: include policies and/or maps that indicate how ecologically important areas and natural features will be managed

3.2.6 Identify where appropriate measures to protect, enhance and restore ecologically important systems, features, corridors and establish buffers along watercourses, coastlines, agricultural lands, and other ecologically important features.”

**UBC Regional Context Statement 2013**

“UBC's Land Use Plan:

- acknowledges and reinforces the Pacific Spirit Regional Park Management Plan (LUP Section 4.1.1);
- encourages the preservation of ecological resources through its
  - Greenway Policy (LUP Section 4.1.2.1)
  - Tree Guideline Areas (LUP 4.1.2.2)
  - Tree Management Plan (LUP Section 4.1.2.3)
  - Green Edges Policy (LUP Section 4.1.2.4)"

Despite being unique natural features of the UBC campus, the Farm and other areas of campus designated as 'Green Academic' (LUP Section 4.1.2) are not mentioned under Goal #3 – Protect the Environment and Respond to Climate Change Impacts. The University should explicitly mention the farm and policies centered on preserving the Farm land and associated educational opportunities. The UBC Farm and other significant green academic areas should be included in Section 3 alongside Pacific Spirit Regional Park, greenways, tree management, and green edges.

**Housing Action Plan**

*Metro Vancouver Regional Growth Strategy:*

*Strategy 4.1 - Provide Diverse and affordable housing choices*

“4.1.8 Prepare and implement Housing Action Plans which:

a) assess local housing market conditions, by tenure, including assessing housing supply, demand and affordability;

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12 [http://www.planning.ubc.ca/vancouver_home/regional_context_statement/goal_3_-_protect_the_environment_and_respond_to_climate_change_impacts.php](http://www.planning.ubc.ca/vancouver_home/regional_context_statement/goal_3_-_protect_the_environment_and_respond_to_climate_change_impacts.php)
b) identify housing priorities, based on the assessment of local housing market conditions, and consideration of changing household demographics, characteristics and needs;
c) identify implementation measures within the jurisdiction and financial capabilities of municipalities...
d) encourage the supply of new rental housing and where appropriate mitigate or limit the loss of existing rental housing stock;
e) identify opportunities to participate in programs with other levels of government to secure additional affordable housing units to meet housing needs across the continuum;”

Over the last few years, UBC has invested a significant amount of time and resources into the development of the UBC Housing Action Plan (HAP). The HAP was approved by the Board of Governors in September 2012, however there is no reference made to the HAP in the RCS under Goal #4 – Develop Complete Communities. UBC has consistently referred to the HAP in addressing the issue of leveraging neighbourhood developments on campus to provide affordable housing for faculty, staff, and students. If UBC is committed to implementing the HAP to provide affordable housing solutions for faculty and staff, this should be acknowledged in the updated RCS.

Explicit acknowledgement to affordable housing was made by Metro Vancouver in the comments provided in 2011 that stated:

“UBC has articulated the need for more affordable housing and smaller unit sizes as part of the rationale for the increase in development. However, they have not provided within the LUP mechanisms to achieve affordable housing, other than increased densities.

The BoG...committed to the preparation of a Housing Action Plan to address housing choice and affordability for student, faculty and staff...However, given their commitment to achieving a higher level of self-containment and affordable housing, the Regional Context Statement should make reference to specific implementation and monitoring mechanisms to achieve affordable housing.”

While the HAP presents policies to holistically address housing options for faculty and staff, the plan does not fully address the need of affordable housing options for students. In developing the campus and fulfilling its goal to house 50% of students on campus, UBC must take strides to make student housing stock accessible and affordable for students. If the issue of student affordability is not addressed, the goal of creating a community where students can live, work and learn will be difficult to achieve.

Assessing Impacts of Neighbourhood Developments on Existing Institutional Infrastructure
Metro Vancouver Regional Growth Strategy
Strategy 4.2 - Develop healthy and complete communities with access to a range of services and amenities
“4.2.4.f - assess overall health implications of proposed new communities, infrastructure and transportation services”

UBC Regional Context Statement 2013
“UBC’s Land Use Plan:

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13 Metro Vancouver, Metro Vancouver 2040 Shaping Our Future (2011) page 46
15 Metro Vancouver, Metro Vancouver 2040 Shaping Our Future (2011) page 47
- encourages redevelopment, in-fill, and new housing areas to be developed at higher density; (section 4.1.6.1c, and 4.1.6.1.e)"16

**UBC Land Use Plan Section 4.1.6.1.e**

"Provide higher density housing in locations that are closer to transit locations and will not adversely affect other uses."17

In many areas where there are planned increases in density and new neighbourhood development there are already institutional developments in place. In such cases, it is necessary to assess the impacts and integration of non-institutional housing and institutional developments. In such assessments, priority should be given to fulfilling the direct academic mission of the university.

To align with the Metro Vancouver Strategy 4.2, UBC should develop a mechanism to assess impacts of new developments on existing communities. This is something that has not been done with respect to recent developments. One such example is the re-zoning of Acadia Park. The land was divided between academic and neighbourhood housing without due consideration for the needs of student families already residing in that community. In order to achieve the goal of socially sustainable communities in neighbourhood and academic developments, a robust process should be put in place for such assessments.

**Principles of Social Sustainability**

The Metro Vancouver Regional Growth Strategy emphasizes social sustainability and social cohesion, highlighting the need for a "strong sense of regional and community identity and connection [which] are also important to promote health and well-being"18. UBC's *Place and Promise* states that "the University explores and exemplifies all aspects of economic, environmental, and social sustainability"19 where "UBC recognizes [the need] to meet society's needs without compromising those of future generations"20. The third goal under sustainability reads: to "foster social sustainability through teaching, research and community engagement that promote vibrant human interaction and community cohesion."21

UBC's Land Use Plan and associated documents sparingly reflect the strong sentiment of social sustainability found in the Metro Vancouver Regional Growth Strategy and Place and Promise, and when done it is centered on UTown neighbourhoods.

There is a need to reconcile the priorities of the Metro Vancouver Regional Growth Strategy, Place and Promise, and the Land Use Plan. The RCS needs to connect the priorities of social sustainability found in these documents, and the Land Use Plan may need to be updated to reflect this key priority in all campus developments.

**Regional Context Statement Update Process**

"Process Timeline:
- April-May 2013 – Public open house and online opportunities to comment on the update to UBC's Regional Context Statement (current phase)

17 UBC Land Use Plan, 2012
19 *Place and Promise* page 26
20 Ibid
21 Ibid page 27
• May-June 2013 – Draft updated Regional Context Statement
• July 2013 – Present draft Regional Context Statement to Chief Planning Office at Metro Vancouver for written comments on its relationship to Metro Vancouver’s Regional Growth Strategy
• November 2013 – Draft Regional Context Statement present to UBC Board of Governors, with request for referral to Public Hearing  

The process timeline cited only has one opportunity for the UBC community to comment on the update to UBC’s RCS prior to Public Hearing which is the current phase. There should be an opportunity for public comment between the presentation of the draft RCS to Metro Vancouver and the presentation to the UBC Board of Governors. The community should have an opportunity to view and provide feedback on the draft statement as well as the written comments from Metro Vancouver. This second round of public feedback should be shared with the Board of Governors prior to referral for Public Hearing.

Summary
The AMS requests that:
• Student residents be included in population projections
• Green space allocation calculations be clarified and provisions be put in place for institutional development green space allocations
• ’Green Academic’ designated areas, specifically the UBC Farm be mentioned in the updated RCS
• The UBC Housing Action Plan be mentioned in the updated RCS along with references to implementation and monitoring of the plan
• Policies be put in place to assess the impacts of neighbourhood developments on institutional developments with specific focus on the upcoming redevelopment of the Acadia Park area
• The university reinforce its commitment to social sustainability in the updated RCS and the Land Use Plan itself
• A second period of public consultation be added to the timeline following the receipt of comments from Metro Vancouver and prior to consideration by the Board of Governors

Thank you in advance for consideration of our comments. We look forward to seeing the updated version of the RCS and continuing to partner in this process to fulfil the university’s academic mission and goals of developing a sustainable and vibrant campus community.

Sincerely,

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Cc:
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22http://www.planning.ubc.ca/vancouver_home/regional_context_statement/timeline_for_updating_ubcs_regional_context_statement.php