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February 22, 2019

Mayor Darryl Walker and Council
City of White Rock
White Rock City Hall
15322 Buena Vista Avenue
White Rock, BC V4B 1Y6

Dear Mayor and Council:

Re: OCP & Zoning Amendments for 1300-Block/1310 Johnston Road

On behalf of the 850 members of the Urban Development Institute – Pacific Region (UDI) and over the 1,150 members of the Homebuilders Association Vancouver (HAVAN), we would like to respectfully outline our opposition to the proposed OCP and Zoning amendments for the 1300 Block/1310 Johnston Road site.

UDI and HAVAN, as a rule, do not provide comments on individual projects. In fact, in this case, the proponents are not members of either organization. They are instead a small group of investors seeking to build homes through their project in White Rock. We are commenting in this circumstance because the proposed amendments, and the process that is occurring to implement them, establishes a worrisome precedent. If approved, these changes will create uncertainty and confusion for our members, and send the wrong signal to the business community and investors.

Our members build housing in partnership with local governments. For this partnership to work, our members need a process that is certain, predictable, consultative, and fair.

After a lengthy planning and consultation process that led to the adoption of a new OCP in 2017, Council is now considering substantially downzoning this site, and potentially others in the future. In our view, downzoning should only occur in rare circumstances in which there are health and safety concerns. Downzoning is especially problematic for our members because they purchase land based on the policies and rules established by local governments in their OCPs and zoning bylaws. Financial institutions provide loans to our members because they have trust the OCPs and zoning bylaws will not be amended to undermine projects and devalue sites. In this case, White Rock established those policies and rules recently, as the OCP was adopted less than two years ago, and the zoning is less than a year old.

For the proponents of this project, not only did they purchase a site based on the OCP and zoning, but they also went through an extensive development permitting process, and were at the stage when they were preparing a Building Permit

application. This is extremely late in the development review process with much time, money and effort already being expended.

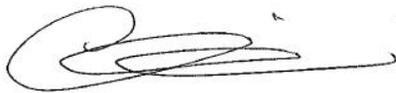
Making substantial changes to projects this late in the process with little consultation is not appropriate. It is akin to a homebuyer finding out after conducting a thorough due diligence on a property, signing legal agreements, paying taxes/real estate fees, and purchasing the property, that their new home has been devalued because only the first floor can be used due to emerging policy changes being instituted by the municipality with little notice or consultation.

In these circumstances, local governments as a rule have provided instream protection to projects. Not only is this fair, but not providing this protection would set an unfortunate precedent that extends well beyond the project. Our members, investors and financial institutions will question whether the City, in the future, without consultation, will quickly downzone other properties. This will include projects that support one of the pillars of the OCP, to reinforce the Town Centre area with developments as mixed-use anchors. Beyond homebuilding, the City's reputation as a place to do business may also be at risk.

Finally, it is our understanding that delays in this project occurred because the proponents were seeking to accommodate comments from the public and to improve the design of the project within the community context. Many communities desire this type of conduct, but in this case, the proponents are being punished for it.

In conclusion, we ask Council not to proceed with the proposed OCP and zoning changes to the 1300-Block/1310 Johnston Road site because it may establish an unfortunate precedent for White Rock and increase uncertainty for those building and investing in the City. We acknowledge that a newly-elected Council may wish to change the direction of development – however, there is a proper process for such change, one that respects the existing policies and the work that proponents and city staff have completed in crafting the development proposal. For the industry to suddenly lose faith in such a process sends an ominous signal to all potential investors in White Rock.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anne McMullin', with a stylized flourish at the end.

Anne McMullin
President and CEO