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August 26, 2019

Tess Rouse
Manager, Energy Programs
Township of Langley
20338 - 65 Avenue
Langley, British Columbia V2Y 3J1

Re: Township of Langley Electric Vehicle (EV) Strategy

Dear Ms. Rouse,

On behalf of the Urban Development Institute (UDI) and the Homebuilders Association Vancouver (HAVAN), we would like to thank you for consulting with our members at the June 6, 2019 EV Strategy Workshop regarding the Township's plans to implement Electric Vehicle Charging (EVC) in new projects. We also appreciate the efforts that staff have made to update our Langley Liaison Committee regarding the EV Strategy.

Both UDI and HAVAN are generally supportive of the proposals. Our members recognize that electric vehicles are going to be more commonly used by buyers and tenants, especially since the Province has stated through its *CleanBC* initiative that it will be introducing successive regulations mandating "... *new light-duty vehicle sales in B.C. to include 10% ZEVs [Zero Emission Vehicles] by 2025, 30% ZEVs by 2030, and 100% ZEVs by 2040.*"

We are also pleased that the Township is proposing to allow the deployment of Electric Vehicle Energy Management Systems (EMSs). This could save a tremendous amount of money for projects, as less hydro infrastructure would be required.

Although we are supportive of the direction the Township is taking, we respectfully offer several recommendations to improve the EV Strategy.

- Coquitlam and Port Coquitlam have opted to initially require one EVC stall per dwelling unit in parkades of multi-family buildings. We ask that Langley consider the same approach at this time. While electric vehicles are becoming more and more popular there is a wide gap between what the Township is proposing to require and what the demand is currently for EVs in Langley. During the Workshop, it was reported that the Township has just seven dual-head stations available for public use, and one DC Fast Charger. There should still be requirements that garages be built so the electrical infrastructure for parking spaces is roughed in (including the sizing of the electrical panels), so that as demand increases, residents can easily and inexpensively obtain a level 2 charging outlet. As EV market share increases, UDI would also support the requirements increasing as well.
- For single-family homes and townhouses, it is not clear why multiple charges would be required. We recommend that the By-law be written, so it is clear that

both parking spots in units have to have access to a charger. In many cases, this may mean only one charger needs to be installed.

- Even with EMSs being allowed, there may still be a few times when EVC infrastructure results in a substantial increase in hydro servicing costs. UDI suggests that the General Manager of Community Development be given the ability to reduce the requirements in circumstances in which there is financial hardship. This may result in fewer GHGs being emitted. For example, if the hydro infrastructure costs are too high, builders may opt to utilize more natural gas in their projects to reduce electricity loads, which would undermine the Township's GHG reduction goals.
- We do have a concern regarding the proposed EVC requirements for visitor stalls. This approach may create issues in the future if residents park in the visitor stalls to avoid paying for the charging of their electric vehicles. Stratas may also resist paying for the electricity of EVs – whether they be used by residents or visitors. For some townhouse projects, there may also be an additional issue with locating EVC infrastructure in spaces that are not near hydro connections.
- Typically many parking stalls in townhouses are located in-between the blocks of townhomes – not only is there no infrastructure but there may not be the clearances between the buildings and charging station. It may not be good practice to centre them on a stall as the likelihood of being hit increases.
- As UDI and HAVAN have stated for other policies and fees, there needs to be grandfathering. When Langley does adopt EVC requirements, it will be critical that in-stream development (e.g. prior to development permit) applications be exempt from the new requirements. It is difficult for proponents to rework designs and accommodate added costs later in the development review process.
- It would be helpful if the Township provided information through bulletins or future workshops on incorporating EVC infrastructure in developments to ensure that Langley's requirements are implemented in the best way possible. Other local governments have done this.

Thank you again for consulting the industry regarding the Township of Langley's proposed EVC requirements. We support the Township's efforts to incorporate EVC in new buildings. If you have any questions about our specific recommendations and comments, please do not hesitate to contact us. UDI and HAVAN would be pleased to discuss them further with you. We look forward to working with Langley on this and other initiatives.

Yours sincerely,



Anne McMullin
President & CEO, UDI



Ron Rapp
Interim CEO, HAVAN