



June 4, 2020

Andrew Merrill  
Director, Development Services  
City of Coquitlam  
3000 Guildford Way,  
Coquitlam, BC V3B 7N2

Dear Mr. Merrill:

***RE: Master Development Plan Rezoning Policy and Procedure***

Thank you for the opportunity to provide comments on the draft *Master Development Plan Rezoning Policy and Procedure*. As discussed at the May 8 City of Coquitlam/Urban Development Institute (UDI) Liaison Committee meeting, we are encouraged by the additional options that this policy will provide for Master Development Plan (MDP) projects. Overall, we are supportive of the policy for mixed-use urban communities however, we respectfully provide our suggestions below.

**Process and Timeline**

We are pleased that the proposed procedure will increase the certainty for MDP projects by clarifying the process and ensuring that expectations are consistent. Due to the elongated process that these types of projects require, we ask that clear direction from both staff and Council be provided at an early stage in the process, and that this direction remain consistent unless there is a significant change in scope by the applicant. We recommend that additional expectations pursuant to draft policies proposed after this direction has been provided not be applied to these types of projects, to provide certainty to the applicant.

This approach provides a number of touch points with Council and the Standing Committee over the duration of the rezoning process. We understand that this will give Council the opportunity to review projects that are brought forward immediately after the City Centre Area Plan (CCAP) is adopted, however it may impact the overall process time for applications.

Furthermore, we recommend that a target approval timeline be explored. We are concerned that by requiring two rounds of public engagement prior to a Public Hearing, it could extend timelines significantly. We propose that the second round of public engagement be waived at the discretion of staff, for projects where public input has been provided previously.

We also ask that the City consider exploring Phased Development Agreements (PDAs) under [Division 12](#) of the *Local Government Act*. PDAs were developed specifically to address the issues and processes involved in master planned communities. If the City is reviewing its MDP approach, we asked PDAs be assessed as a potential tool for Coquitlam and our members.

**Applicability**

While there is support for this policy from our members for mixed-use urban developments, it is not an applicable policy for suburban single-family and townhouse developments, which are

often larger than 2.5ha. Section 2.1.2 of the Official Community Plan (OCP): [Comprehensive Master Plan Policies](#), already poses significant challenges in alignment when applied to suburban developments due to the same 2.5ha trigger, and the proposed MDP procedure will exacerbate the issues faced by these types of projects. We recommend that the proposed policy as well as OCP Section 2.1.2 more clearly define their intended use, and that they not be applied to low-density, single-family or townhouse developments.

### **Parkland Dedication**

Given this is a procedural manual, we were surprised to come across the requirement for a Public Space, Parks, and Amenities Plan, which “shall comprise a parkland dedication of at least 5%, of the total site area with a minimum 0.2 hectare size (or cash in lieu).” Although the provision of publicly-accessible open spaces and/or plazas is set out in Section 2.1.2 of the OCP, this section is written with more flexibility, in contrast to the prescriptive requirement listed in the policy and procedures document. In addition, the OCP does not require that the parkland be dedicated to the City, this is a material change that has been included in the proposed procedure. The enabling clause in the *Local Government Act* typically applies to single-family homes or greenfield sites and could be very punitive if cash in lieu payments simply are required when park dedications are not possible or necessary.

We are concerned that by requiring a parkland dedication, it could over-simplify the objective of creating a thriving and livable urban core. The trade-off of additional land dedication/payment for parks will result in reduced ability for developments to creatively integrate voluntary public amenities scattered throughout the master-planned communities. By specifying that amenities be provided in the form of a parkland dedication, it could result in a step back from the forward-thinking urban design principles seen in new city centers and in contrast to the planning vision apparent in the proposed CCAP.

In the context of the recent DCC program increases, which were largely attributed to parkland acquisition and improvement, we believe that this new dedication requirement will add unnecessary demands, over and above those already in place. We are concerned that this significant request has not been evaluated in parallel with the DCC program. Applying today’s DCC rates to under-developed properties in the CCAP’s core could generate in excess of \$500 million in Parks Acquisition fees and another \$135 million for Park Improvements.

We hope that staff will consider our comments above, in particular to:

- Provide early and consistent direction to applicants;
- Take steps to mitigate the lengthy process that MDP projects require;
- Assess the potential use of PDAs;
- Clarify the intended application of the policy to urban contexts; and
- Remove the parkland dedication requirement from the proposed policy and procedure document.

We hope that you will take these comments into consideration as this policy advances and UDI looks forward to working with staff on this and other initiatives. If you have any further questions regarding our comments, please don’t hesitate to contact me.

Sincerely,



Anne McMullin  
President and CEO, Urban Development Institute