



URBAN DEVELOPMENT INSTITUTE- OKANAGAN CHAPTER

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May 7, 2021

City of Kelowna
1435 Water Street
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Attention: Robert Miles

Subject: Summary of Final Feedback on Official Community Plan (OCP)

UDI Okanagan is appreciative of the extensive amount of consultation that we have had with the City of Kelowna over the last two years as part of the City's OCP review process. We have included an Appendix that lists the major touchpoints that we have had with the City during this review process to illustrate the amount of effort that has gone into this review. We hope our collective efforts result in a better document and that staff continue to value industry's perspective on the many complex issues that our City faces as it grows.

The purpose of this letter is to provide a high level summary of the key issues that we have identified during this consultation process that remain our top priorities.

Before summarizing these issues, we want to first recognize that there are a lot of positive elements in the draft OCP document. This includes but is not limited to policies that promote higher density, corridor planning, encouraging urban housing diversity, and many others.

While we are supportive of many of the policies contained within the OCP, we believe that it was initially envisioned to remain a high-level guidance document but has grown to hundreds of pages of details that staff and industry alike are challenged to navigate and interpret. There are extensive interpretation issues, including many areas where the guidance conflicts with itself elsewhere in the document. The way it is currently structured, staff and industry will be challenged to have OCP compliance and thus, technically, could see a significant spike in OCP amendment applications.

We suggest simplifying and reducing the key policies for inclusion in the OCP bylaw while keeping the more in-depth details in a lower order document for guidance.

One of our primary concerns is that the land use signals through the OCP are not conducive to bringing on a high enough amount of supply to the market sufficient to meet the demand. On the one hand, new suburban neighbourhoods are discouraged yet at the same time, there are recent examples of Council not approving density where it needs to exist in order to bring on the intended supply. This situation

raises a red flag that affordability may be permanently lost in the City and chased out to other Okanagan communities.

We also believe that the messaging surrounding suburban development needs to be reconsidered. We suggest reframing the message from 'stopping' suburban development, to 'doing it better'. Industry is receptive to doing it better such as by maximizing infrastructure in the ground, applying more sustainable construction techniques, implementing higher levels of the Step Code, adding a broader mix of housing uses, etc. but staff, too, need to remain receptive. The entire suburban development segment warrants a revisit at 'doing it better' versus just not doing it at all.

In order for both the core and suburban areas to meet the density demanded by the market and the OCP, a robust and ambitious housing supply implementation strategy is required. We implore staff to move forward with a full toolkit of options in this regard. If not, the risks of implementing the plan will fall on private industry to accept the development risk. Options such as pre-zoning, fast-tracking applications, delegating permit approval authority, incentive programs and waiving public hearings for OCP compliant applications require serious consideration. For example, Council could direct staff to propose pre-zoning area suggestions. Otherwise, it will be virtually impossible to schedule the number of applications required for the desired growth.

There will inevitably be OCP amendments once the new bylaw is adopted and these could be streamlined into two categories. One category for significant changes in land use being proposed, with the other category for boundary adjustments that do not have a material impact on land use policy. This would help provide industry certainty, consolidate public commentary, and reduce application workload by staff and council. Benefits for all stakeholders.

Finally, we believe on-going monitoring and practical implementation steps will be critical to the plan's ultimate success. The housing projections used for developing the OCP are not necessarily reflective of more recent trends in Kelowna's maturation, as the plan extrapolates from historic trends rather than anticipating a different growth trajectory for Kelowna. For example, population growth in excess of the proposed plan would be a significant indicator to trigger needed review. While the implementation plan considers a number of new lower-level plans to be completed, commitments to more direct and practical ways to implement additional housing supply in keeping with the OCP is critical.

Once again, as community development partners, we are appreciative of the opportunity to provide important input on the Official Community Plan. Thank you in advance for your consideration.

Sincerely,

URBAN DEVELOPMENT INSTITUTE OKANAGAN CHAPTER

Andrew Gaucher
UDI Okanagan OCP Committee Chair

Luke Turri
UDI Okanagan Chair

Cc: Ryan Smith, City of Kelowna

City of Kelowna Mayor and Council



APPENDIX A: List of Key OCP touchpoints with City of Kelowna

- **Feb. 14, 2019** - UDI letter to City of Kelowna on Growth Scenario 3
- **Mar. 14, 2019** - UDI Thank you letter to City of Kelowna Mayor & Council – OCP Growth Scenario 3
- **Nov. 29, 2019** - UDI meeting with City of Kelowna on draft OCP Land Use Maps
- **December 10, 2021** – UDI meeting with City of Kelowna – 2040 OCP Session #1
- **December 20, 2019** - UDI memo to City of Kelowna on draft OCP Land Use Maps
- **January 10, 2020** - UDI letter to City of Kelowna on OCP Land Use Mapping.
 - **January 23, 2020** – City of Kelowna response letter to UDI.
- **Dec. 10th, 2020** - OCP Committee meeting with City of Kelowna to discuss OCP Review
- **Feb. 2, 2021** – UDI/City meeting - Kelowna 2040 OCP Urban Centres and Core Area Workshop #1
- **Feb. 4, 2021** – UDI/City meeting - Kelowna 2040 OCP Suburban Neighbourhoods and Rural Lands Workshop #1
- **Feb. 26, 2021** – UDI/City meeting - Kelowna 2040 OCP Indicators and Monitoring Workshop #1
- **April 7, 2021** – UDI/City meeting - Kelowna 2040 OCP Urban Centres and Core Area Workshop #2
- **April 13, 2021** – UDI/City meeting - Kelowna 2040 OCP Suburban Neighbourhoods and DPA Workshop #2
- **April 20, 2021** – UDI/City meeting - Kelowna 2040 OCP Indicators and Monitoring Workshop #2
- **April 22, 2021** – UDI/City meeting - Kelowna 2040 OCP Form & Character DP Guidelines