

December 7, 2021

Metro Vancouver
Metrotower III
4515 Central Boulevard
Burnaby, B.C.
V5H 0C6

Attention: Sav Dhaliwal, Board Chair

Dear Sir:

Our File: 6410.00

RE: METRO VANCOUVER 2050 – DRAFT REGIONAL GROWTH STRATEGY

Langley City Council received the referral of the draft regional growth strategy (RGS) on July 21, 2021. Following a presentation from Metro Vancouver staff on November 1, 2021, Council considered *Metro Vancouver 2050* and adopted the following comments at its Regular Meeting on December 6, 2021.

1. General

Metro Vancouver 2050 builds upon the goals and strategies of the existing RGS and presents a strong vision for the management of growth in the region. The draft RGS shares and supports many of the same goals as the City's new Official Community Plan. While the City generally endorses the draft new RGS, it is concerned with the increasingly detailed and prescriptive expectations of member municipalities. Each successive Metro Vancouver RGS from *the Livable Region Strategic Plan* (1996) to *Metro Vancouver 2040* (2011) and the current draft RGS, *Metro Vancouver 2050*, has imposed greater requirements on members, in many cases necessitating new work programs or reducing local autonomy over planning and development decisions.

2. Urban Centres & FTDA's (Table 3)

Table 3 adds new urban centre and Frequent Transit Development Area categories to the RGS. In the City's view, the proposed framework of centres and overlays is unnecessarily complex for a regional plan. In this light, each new category reduces clarity and weakens the City's preferred emphasis on Regional City Centres which have provided the foundation for regional planning policy in Greater Vancouver since the 1970's.

3. Employment Land Policies (Sec. 2.2.9 d) vi)

Metro Vancouver 2050 includes a new exemption to allow residential development on Employment lands in urban centres located within 200 metres of a rapid transit station. This

exemption is at odds with the City's land use policies in its recently adopted Official Community Plan (OCP) which permit only caretaker's dwellings in Mixed Employment areas (RGS Employment lands). The City believes that the proposed exemption may increase speculation, inflate Employment land values and encourage OCP amendment applications. The City's preferred approach would be to adjust the land use designation mapping where appropriate rather than weaken the Employment land policies with exemptions.

4. Ecosystem Protection & Tree Canopy Cover Targets (Sec. 3.2.7 a))

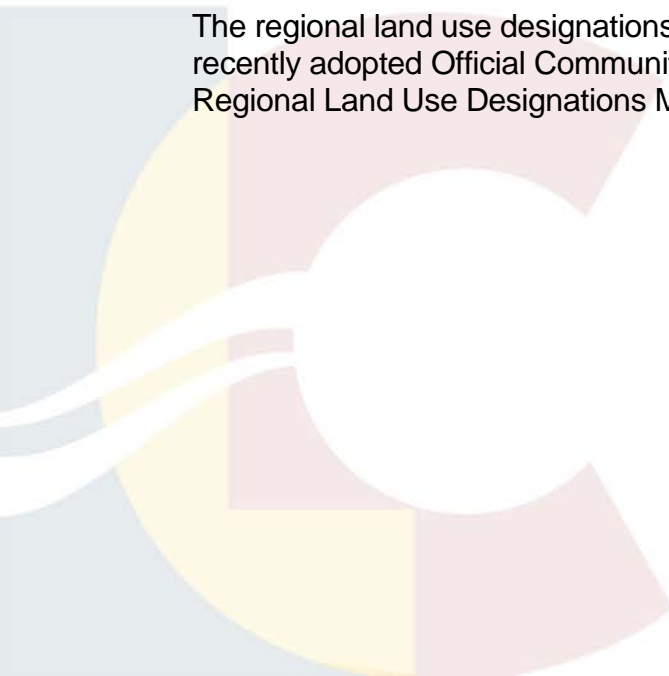
The new ecosystem protection and tree canopy targets identified in the draft RGS are attractive, aspirational goals for the region. While the City applauds the goals, it would caution that the specific targets may not be realistic or achievable in a region projected to grow by one million inhabitants. In the City's case, as a fully urbanized and developed municipality, there is very limited capacity to add to the protected land base. At the same time, continuing redevelopment at higher densities and lot coverages will require a concerted tree planting program to replace and ultimately enhance the tree canopy. An Urban Forest Strategy is required in order to determine an achievable tree canopy target for the City.

5. Affordable Rental Housing Target (Sec. 4.2.7 a))

The City supports the goal of achieving a 15% affordable rental housing component within new development or redevelopments in the region. However, while non-market affordable housing units can be measured, monitored and secured through housing agreements, the affordable rental units offered through the housing market are not easily identified and can only be measured reliably at five-year intervals with Census data. In addition, the regional target makes no allowance for existing conditions at the local level. In 2016 for example, the City of Langley had the second lowest shelter cost for rented dwellings and the highest proportion of tenant households in subsidized housing in the region. An update to the City's Affordable Housing Strategy will be required in order to determine an appropriate contribution to the regional target.

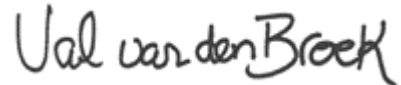
6. Map 2 – Regional Land Use Designations

The regional land use designations shown in Map 2 should be revised to reflect the City's recently adopted Official Community Plan and Regional Context Statement (see attached Regional Land Use Designations Map from OCP Bylaw No. 3200).



The City strongly supports Metro Vancouver's initiative to update the regional growth strategy and appreciates the opportunity to participate in this vital process at the Board, committee and staff levels. Langley City Council and staff look forward to continued cooperation and dialogue with the region as we progress towards adoption of *Metro Vancouver 2050*.

Yours truly,

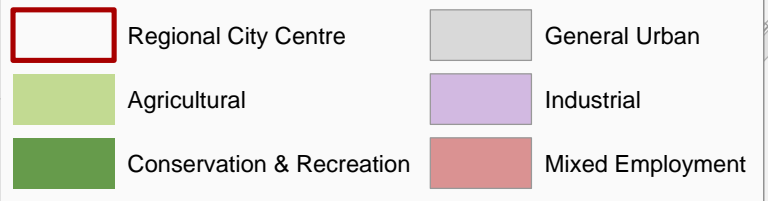
A handwritten signature in black ink that reads "Val van den Broek". The signature is written in a cursive, slightly slanted style.

Val van den Broek, Mayor

cc: Langley City Council
Francis Cheung, P. Eng., Chief Administrative Officer
Carl Johannsen, RPP, MCIP, Director of Development Services



2. Regional Land Use Designations



**Langley Centre
(Willowbrook)**

Langley Centre

