

ATTACHMENT B

SUMMARY OF INPUT (MAY 2021)

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Summary of Comments Received in April and May 2021

Summary of Comments from the Nanaimo Old City Association:	Staff Comment:
<ul style="list-style-type: none"> Supports waiving CAC 75% for a rezoning for non-market rental housing units, do not support waiving 100%. 	When non-market rental housing is proposed there is generally a very limited budget to bring the project to realization, and the City is typically requested to assist in making the project more viable. Waiving CACs 100% is one way that the City can support bringing much needed non-market housing to Nanaimo.
<ul style="list-style-type: none"> Honour neighbourhood plans when allocating community amenity contributions. 	The CAC Policy references consideration of neighbourhood plans when allocating CAC funds.
<ul style="list-style-type: none"> List of suggested ideas for amenities in the Old City neighbourhood. 	The list of acceptable public amenities is currently within the Official Community Plan and Neighbourhood Plans. Any additional input from the community can be forwarded to Staff for consideration in CAC negotiations with the applicant and for future planning processes.
Summary of Comments from the Newcastle Neighbourhood Association:	Staff Comment:
<ul style="list-style-type: none"> Recommends that the CAC policy include a clause that a developer should consult with the neighbourhood association regarding how to direct the community amenity funds. 	Applicants are encouraged to engage with the neighbourhood prior to or during a rezoning process, and it is during this process that a neighbourhood can comment on the CAC. Also, the neighbourhood association has an opportunity to comment through the City referral process.
<ul style="list-style-type: none"> Amend policy such that CAC funds not be directed to the Housing Legacy Reserve Fund when the rezoning is already for an affordable housing project. 	A sentence has been added to the CAC Policy to acknowledge this situation, such that when an affordable housing project is proposed the allocation of the CAC funds can be negotiated as appropriate for the situation.
<ul style="list-style-type: none"> Does not support waiving the CAC contribution 100% for rezoning applications for non-market rental housing units. 	When non-market rental housing is proposed there is generally a very limited budget to bring the project to realization, and the City is typically requested to assist in making the project more viable. Waiving CACs 100% is one way that the City can support bringing much needed non-market housing to Nanaimo.
Summary of Comments from the Stephenson Point Neighbourhood Association:	Staff Comment:
CACs should be directed to pedestrian infrastructure improvements to improve pedestrian safety on public roads.	Section 7.3 of the Official Community Plan contains policy to allow the City to direct CAC funds to pedestrian safety on public roads, and CAC funds have been used for this purpose in the past.

CACs be required for properties previously rezoned to R10 'Steep Slope Residential'.	The city can only request CACs at the time of a rezoning application, and cannot require CACs at the time of a development permit or building permit application.
Summary of Comments from representatives of the Nanaimo Development Community:	Staff Comment:
Council should be aware of a development project's financial viability when creating overlapping policies (i.e. MOESS, Step Code rezoning policy, DCCs, and CACs).	Rollo & Associates Ltd. has considered the development costs in Nanaimo and has determined that the recommended CAC rates are supportable.
Council should strive to ensure that CAC rates do not discourage the creation of new housing units.	The proposed CAC rates are line with the current market, and are as recommended by land economist Rollo & Associates Ltd.. The Rollo & Associates Study (July 2020) states that CACs do not affect housing affordability, and that it is the housing market that establishes what the consumer is willing to pay for a unit. CACs are built into the developer's project budget and purchase price of the land. The objective of a CAC Policy and CAC rate is to provide greater certainty to developers in their land and project evaluations.
Recommend that a CAC model be based on the increased density. If the CAC rate is based on the increased density then the rate can be higher.	The Rollo & Associates Ltd. recommended CAC rates are based on the total number of units or total floor area for a property, which is consistent with the City's current practice.
Recommends that the CAC Policy be calculated by floor area for multi-family rezoning types, rather than per unit.	The CAC Policy presented for consideration includes the CAC per unit rates as recommended by the GPC on 2021-MAR-08, and as recommended by Rollo & Associates Ltd. Using a metric based on floor area would favor smaller units and unintentionally penalize larger family sized units and units designed for accessibility. Instead, the recommended per unit rate is based on an average unit size that is typical for new developments in Nanaimo.
Recommends that the CAC Policy allow for flexibility to allocate funds to community priorities as they change over time. Supports directing CAC funds to the Housing Legacy Reserve fund at this time.	This recommendation is inline with the current practice of allocating CAC funds based on OCP policy, neighbourhood plans, and other City policy documents.
Recommends that the 50% reduction for market rental dwelling units should occur when the vacancy rate is 3-4% to prevent future housing crisis.	The 'Special Considerations' section of the CAC Policy does not contain a vacancy rate, such that the 50% CAC reduction can be applied to secured market rental dwelling units at any time.
Recommends CAC incentives for private developers who propose affordable housing units.	Clause (c) of the 'Special Considerations' section can apply to private developers if the required criteria can be met for the proposed non-market rental dwelling units.