

From: FIPPA Sec. 22 (1)
To: [LegislativeServices](#)
Subject: Concerns with Unit Sizes in Replacement Rental Building of Rez #18-49, 6645-6707 Dow Avenue, Public Hearing: June 27, 2023
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Attachments: [image001.png](#)
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Dear Mayor and Council,

I am writing to express long-standing concerns of Metrotown tenants regarding the unit sizes in replacement buildings, particularly in relation to the proposed Rez #18-49 at 6645-6707 Dow Avenue. Before I proceed, I want to acknowledge that unlike in other developments, the non-market building of Rez #18-49 includes several positive features, such as a window in every bedroom as required by the BC Housing Design and Construction Guidelines 2019, a balcony to maintain a connection to the outdoors, in-suite washer and dryer, and a higher percentage (42%) of two- or three-bedroom apartments. Furthermore, I want to express my appreciation to the Planning and Development Committee (PDC) for strongly rejecting the recent Rental Use Zoning Policy (RUZP) Review on June 14, 2023, which failed to adequately address concerns about unit sizes and appeared to prioritize developers' interests over the livability needs of the community. In this letter, I will focus solely on the issue of unit sizes.

The proposed Rez #18-49 indicates a range of 539 – 566 sq.ft. for the 55 non-adaptable one-bedroom suites. However, upon closer examination of the architectural diagrams, it becomes evident that the average size of the non-adaptable one-bedroom units is 543 sq.ft., with only one unit measuring 566 sq.ft. This average is just above the minimum requirement of 538 sq.ft. set by the Burnaby rezoning bylaw. (It is worth noting that the RUZP Review even proposed reducing this minimum to 525 sq.ft., likely setting an even lower standard.)

Non-Market Rental (Rental Replacement)

1 – Studio	36.00 – 37.00 m ² (385 - 397 sq. ft.)
55 – One Bedroom	50.00 – 53.00 m ² (539 - 566 sq. ft.)
4 – One Bedroom (adapt.)	53.00 - 53.00 m ² (566 sq. ft.)
29 – Two Bedroom	65.00 – 75.00 m ² (700 – 810 sq. ft.)
21 – Two Bedroom (adapt.)	68.00 – 70.00 m ² (731 – 749 sq. ft.)
2 – Three Bedroom	81.00 – 83.00 m ² (872 – 893 sq. ft.)

112 units

These one-bedroom units are simply inadequate for established partner households, some of whom have resided in 640 sq.ft. units for decades. These households often utilize furniture to create multifunctional living spaces, allowing for improved privacy, recovery during periods of ill health, or the ability to comply with employers' demands to work from home. Unfortunately, these essential living arrangements are no longer feasible in 540 sq.ft. open concept units. While smaller units may work for some tenants, they are physically and socially unsuitable for others, particularly for established partner households. Note that Burnaby's Housing Needs Report suggests that 50% of partner households require a two-bedroom suite. Although the situation differs in the realm of replacement rental buildings, it underscores the

fact that a significant number of partner households will struggle to live comfortably in a 540 sq.ft. replacement unit.

Regrettably, Council’s repeated requests to align unit sizes in replacements buildings with those in strata buildings have been disregarded. The unit sizes and configurations in the replacement building of Rez #18-49 significantly contrast with those in the strata buildings. Diversifying the range of unit sizes should be the general approach taken for replacement buildings, too. The problem is not the minimum unit sizes per se; the problem is that almost all replacement units are minimum-sized.

Market Strata

138 – Studio	37.00 – 51.00 m ² (398 - 550 sq. ft.)
109 – One Bedroom (rental size)	50.00 – 51.00 m ² (538 - 546 sq. ft.)
130 – One Bedroom + Den	56.00- 64.00 m ² (603 - 684 sq. ft.)
45 – One Bedroom + Den (adapt.)	64.00 – 64.00 m ² (684 sq. ft.)
61 – Two Bedroom	70.00 – 110.00 m ² (753 – 1182 sq. ft.)
38 – Two Bedroom (adapt.)	96.47- 97.20 m ² (860- 907 sq. ft.)
156 – Two Bedroom + Den	81.00 – 107.00 m ² (871 - 1151 sq. ft.)
72 – Two Bedroom + Den (adapt.)	85.00 – 105.44 m ² (916- 1135 sq. ft.)
21 – Three Bedroom	100.00 – 145.00 m ² (1079- 1562 sq. ft.)
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770 units	

Ironically, the rezoning application refers to the 109 P11e-sized 540 sq.ft. one-bedroom strata units as “rental size,” effectively implying “investment size.” Indeed, it is unlikely that many of these 540 sq.ft. strata units will be owner-occupied, especially not by partner households. On the contrary, within the realm of replacement rental buildings, partner households will most certainly occupy such units due to the occupancy requirements set by BC Housing.

Perhaps it is time to engage the external team that drafted Burnaby’s Housing Needs Report to collaborate with tenant representatives, such as BC ACORN, and individual tenants affected by redevelopments. This collaboration could facilitate a comprehensive review of a Rental Use Zoning Policy that not only considers the financial needs of developers but also livability needs of tenants.

While there are many positive aspects to report on in the proposed replacement building of Rez #18-49 at 6645-6707 Dow Avenue, the lack of suitable-sized spaces for partner and family households will undoubtedly lead to hardship and social conflicts. I sincerely hope that City Planning will seriously consider these concerns in the next version of the RUZP Review.

As Rez #18-49 will undoubtedly move forward, I only want to request that tenants displaced from a one-bedroom apartment be at least given the opportunity to upgrade to a small two-bedroom unit upon their return to the replacement building, contingent on availability and at no additional cost to the developer. This arrangement can be determined by a rent increase equal to the difference between 20% below CMHC median rates for a two-bedroom and a one-bedroom unit. Such a measure would provide some peace of mind for returning partner households, ensuring they will not be confined to a 540 sq.ft. unit with no options.

Sincerely,

Reinhard Schauer
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