

Feb. 25, 2022

City of Kelowna  
1435 Water Street  
Kelowna, BC, V1Y 1J4

**Attention: Zoning Bylaw Project Team, City of Kelowna**

**Subject: Feedback Letter #2 on Draft Zoning Bylaw**

Thank you for providing UDI Okanagan with the opportunity to provide additional input on the City of Kelowna's draft Zoning Bylaw. With the recent adoption of OCP 2040, it is clear that a new Zoning Bylaw is a top priority to help implement this new vision. While replacing such a significant and long-standing document is challenging, we commend staff's work to-date and appreciate the receptivity to feedback from various stakeholders, including UDI Okanagan.

Since our last formal feedback letter dated November 25, 2021, we have engaged with staff through additional working sessions to discuss various details of the draft bylaw. We note and acknowledge that a number of UDI's suggested revisions were considered and incorporated in some way into the second draft.

With the additional time granted to review and provide feedback following the initial consultation period, we continue to have concerns related to several key areas of the proposed bylaw. We have attempted to highlight and summarize these areas of concern by category in the attached "Appendix A". Given the size of the document and the implementation schedule constraints, we have done our best to prioritize key areas of feedback in a solution-orientated manner. Please note that individual developer members will also be providing their own specific feedback on various sections of the draft bylaw.

As always, our comments submitted are in the interests of creating the best possible municipal policy moving forward. This includes practical and feasible regulations, while ensuring there is

enough flexibility and ability for individual development projects to enact the vision of OCP 2040. We hope our continued collaboration, alongside other stakeholders, is helpful in achieving this goal.

UDI would be pleased to be a continued collaborator as the document is refined. To this end, we would request the opportunity to review a future draft prior to Initial Consideration by City Council, in order to provide enough time to formulate any final comments. If there is any specific further feedback or insight you would like to request at this time, please let us know.

Sincerely,

**URBAN DEVELOPMENT INSTITUTE OKANAGAN CHAPTER**

Per:

Jennifer Dixon, Executive Director  
Executive Director

Luke Turri, Chair  
UDI Okanagan

cc. Ryan Smith, Divisional Director, Planning & Development Services  
Doug Gilchrist, CAO

## APPENDIX A

UDI Okanagan Feedback: City of Kelowna Zoning Bylaw Draft #2

*Commentary organized by category/section where appropriate.*

### SECTION 2 – DEFINITIONS

UDI provides the following suggestions and requests for clarification:

- Buildable Area: The definition for Buildable Area currently excludes slopes over 30%. It should be revised such that areas of front slopes on walkout lots and back slopes on uphill lots are not excluded.
- Common Amenity Space: See recommendations in Section 14.
- Grade, Finished: the proposed wording of “finished grade can increase or decrease at a maximum rate of 15% from the base of the wall to the width of the setback at the location or at least 1.5 meters wide (whichever is less): We understand that this has been added with single family in mind as a way to avoid one lot raising the grade much higher than adjacent. That being said, this 15% measure can cause confusion as to where we need to measure from. This does not make sense for multifamily where setbacks can be quite far from buildings.
- Third Storey Floor Area Diagram: Clarification is required – for example, is the 2nd floor “gross”? Would garage space be included?
- “Visual Example of Max Floor Height for Ground Oriented Housing” and “Visual Example of Min Net Floor Area for Ground-Oriented” should be renamed since they are no longer a requirement for ground-oriented housing. As per Footnote 3 in Section 13.5, the diagrams are more parameters for reducing setbacks.

### SECTION 6.8 - DENSITY & HEIGHT BONUS PROGRAM

While limited density bonusing has been inherent in the current zoning bylaw, there has yet to be a fee-based model to achieve bonus density within the City of Kelowna. There is concern from UDI that this program will add another cost to providing new development, including housing. As the program is not regulated in the same way as a DCC program, there is also the potential for these bonusing rates to be changed arbitrarily in the future, which is a significant concern.

That said, we understand that staff are seeking to provide some certainty to the development process for both the development community and the public at-large, and the explicit bonusing program could enhance such certainty. If such a program were to be in place, we would propose the following changes:

- It would be important to ensure that the bonus density is truly a “bonus”, rather than a necessary pathway to achieve the densities identified within OCP 2040. We do not believe that baseline densities are high enough to allow for OCP objectives to be met without bonusing – per previous discussion and correspondence.
- Consider a sliding scale of bonusing, based on how much of the bonus density/height is utilized. Currently, the program is binary (either the full amount is paid or nothing).

- Create flexibility for bonus densities for other merits, including non-market housing, energy efficiency, or other community amenities (as was created for rental housing).
- Rates are proposed to increase by 2% until 2023, where they could be amended at a future date. We would propose that cost increases be tied to an objective number, such as CPI. This would limit the opportunity to see the density bonus program as a revenue opportunity in the future.
- Provide clarity over how the bonus funds would be directed/used.

See Sections 13 & 14 for additional comments on the density & height bonusing program, specific to those zone categories.

## **SECTION 6.11 – GRADING**

UDI provides the following suggestions:

- Regarding the definition and regulations of finished grades (Sec 6.11.2 & 6.11.3), the criteria of 10% deviation should be revisited. A minimum nominal amount (e.g., 1.0m) should be considered.
- Variations in home styles also need to be considered applicable to the lot. For example, a home on a transitional type of lot (i.e. side walkout) where the location/configuration of the drop in backyard grade from main to basement level varies depending upon the owner's preference and home design.

## **SECTION 7 – SITE LAYOUT**

### **Section 7.2 – Landscaping Standards**

The proposed landscape regulations are very specific. Regulations as prescriptive as the ones included in the Bylaw could lead to many requests for variances in instances where it would have been more cost and time efficient to have flexibility for staff approval built in. The level of detail proposed in the new bylaw could be captured within design guideline documents rather than such detailed prescription. Otherwise, it is difficult for one set of regulations to be an appropriate landscaping response to all sites. Furthermore, the specific landscape regulations are unlikely to be appropriate for all asset classes – for example, industrial zones.

In addition to the above general comments, we have the following specific recommended changes:

- In Table 7.2 – Tree & Landscaping Planting Requirements, Footnote 1 states 'If the lot is greater than 18 meters in width then two trees are required.' We believe that the number should be adjusted from 18 meters to 22 meters.
- In Section 7.2.8 (a), it states 'maximum 1:3 slope (33%) for lawn areas.' Lawn areas is not a defined term and is too specific as many owners prefer natural or low maintenance landscaped areas.

*UDI recommends allowing for more flexibility and staff latitude within the proposed the landscape regulations.*

## **Section 7.5 – Fencing and Retaining Walls**

The maximum height of a fence relative to a retaining wall requires additional consideration. For example, if a retaining wall is 5 feet, then the proposed bylaw would limit the maximum height of a fence on top of the retaining wall to 3 feet on top of that. There are several considerations and hazards with this, including minimum building code requirements for a guardrail height of 3.5ft.

## **ELECTRIC VEHICLE CHARGING STANDARDS (Formerly Section 8.2.18)**

UDI has shared previous concerns with staff when Section 8.2.18 (EV Ready regulations) were removed from the Zoning Bylaw review process and sent to Council for approval separately. As we have already highlighted our procedural concerns with this change, we will focus on the proposed regulations themselves.

We believe that the current requirement to provide an EV ready stall for each and every residential home is excessive, especially considering there is no current requirements. Large changes should be considered in a staged approach, like the BC Building Code's Step Code. Rather than a blanket, "0-to-100" proposal, staff should consider a staged approach, including incentives for early adopters.

EV Ready regulations should vary depending on tenure. Currently, there is no differentiation between a rental building versus a condo. EV charging demand for a rental building would be much less than a condo, and dealing with retrofits in a rental environment is much less complicated as there is no shared strata ownership. Having new, additional costs on housing is difficult, but particularly so for purpose-built rental homes. Experience in most rental projects we have reviewed shows little to no uptake or demand for EV stalls at this time.

The requirement for Level 2 charging also adds significant costs (~\$4500/stall) with little benefit. We believe the additional costs presented to Council have been undersold, and the costs for future retrofit over-stated.

The development industry is certainly keen to future-proof developments, and we will be engaging technical experts on this matter to provide further recommendations to the City prior to the EV ready changes being sent for Initial Consideration. In the meantime, we recommend that the City strongly consider reducing the requirements. We propose to provide conduit from the transformer, as well as assurance of transformer capacity for EV upgrades to stalls in the future. As charging technology is evolving rapidly, and with costs for charging stations likely to continue to come down in the future, a "rough-in" approach would also allow for the EV market to evolve, along with other alternative fuel sources.

## **SECTION 9.11 - TALL BUILDING REGULATIONS**

### **9.11.1 General Intent**

It is not clear if it is the intention of these regulations to apply to: a) portions of buildings above 13 storeys/40.0m; or b) all portions of a building, should the building be greater than 13

storeys/40.0m. If it is the latter, this would limit the ability to build a hybrid-type tower, with a podium, mid-rise portion (from levels 6-12), with a slender tower above.

*UDI recommends that the regulations apply to portions of buildings above 40.0m.*

### **Podium Height (Table 9.11)**

A number of recently approved projects have designed successful podiums that meet the 16m height limit but are five storeys. Podium facades and active uses vary depending on site size and architecture. To achieve a building height-to-street width ratio, the nominal height should be the only relevant measurement.

*UDI recommends that the maximum podium height should be based solely on nominal height (i.e. 16 meters) rather than a number of stories.*

### **Minimum Building Separation (Table 9.11)**

Previously, tower separation has been included as a design guideline within the OCP to help evaluate high-rise proposals. As proposed, the minimum 30.0m separation would appear to apply across property lines. Creating a zoning regulation that is dependent on how a neighboring parcel has been developed would be very problematic (and may present legal challenges). This would create a “first-in” scenario, where a property owner’s development potential is contingent on how and when a neighbour chooses to develop their property.

Should the intent be to have this building separation regulation apply across property lines, additional clarification would also be required. For example, what if a tall building is proposed beside an existing mid-rise tower building?

In addition, the original draft noted a 25m separation requirement. It is not clear why this requirement was increased to 30m. When measuring this minimum building separation, balcony projections should be excluded from the calculation, as balconies do not contribute to building massing in the same way as the principal building. If balconies are included in the calculation, it would also discourage large balconies.

*UDI recommends that minimum building separation would apply to multiple towers on the same site, while separation across property lines continue to be a design guideline. The minimum separation (between towers on the same site) should be 25.0m, not 30.0m, with balconies excluded from the calculation.*

## **SECTION 10 – AGRICULTURE AND RURAL RESIDENTIAL ZONES**

### **A1 Zone - Carriage Homes on ALR Land**

On Dec. 31, 2021, the ALR Use Regulation was amended to permit the construction of one additional residence per parcel, subject to specific criteria and to end the prior permission under the ALR Use Regulation for manufactured homes for family members. This update to allow secondary houses within ALC land parcels was announced in the [ALC Information Bulletin 05](#). This announcement is great news for agricultural property owners in the ALC across BC and in the City of Kelowna.

In light of this ALR Use Regulation change, we want to ensure that the City of Kelowna's Zoning Bylaw is aligned with this new update. Currently, the draft Zoning Bylaw map shows ALL properties in the ALR/ALC are being re-zoned to A1, regardless of previous zoning designation. At the same time, there is no provision for A1c in the new Zoning Bylaw, which has been removed from what is shown in the existing Zoning Bylaw and is now in conflict with the new ALC regulations. We understand the City's desire to amalgamate all ALR/ALC properties into one zone, however there can be unintended consequences with this that we would like to highlight as well as provide suggested solutions.

One notable impact of the City's decision to have all ALR/ALC properties zoned to A1, is that properties in the ALR/ALC that are currently zoned RR1/RR2 will be rezoned to A1 and this can effectively become a downzone. The reason for this is because while there are still more permitted uses under A1 versus RR1/RR2, the ability to rezone to a "c" carriage home on the site is lost.

*UDI Okanagan recommends that the City explore potential options to mitigate the impact of potential downzoning for previous RR zoned properties. One option could be to reintroduce the subzone A1c. Another option could be to change RR1 and RR2 zoned properties to the A2 zone. Alternatively, the City might want to explore maintaining the RR1 and RR2 zones so that they have the potential for RR1c or RR2c in the future.*

### **Agri-Tourism Accommodation Units - A1t**

Agritourism units are permitted under the ALC and are also promoted by other municipalities in BC and the Okanagan. The City of Kelowna previously had an A1t - Agriculture 1 with Agri-tourism Accommodation included in the A1. This has since been removed in the draft updated Zoning Bylaw.

The A1t zone is critical to the success of agriculture in our community, feasibility of wineries, beneficial for tourism, economic development and provides much needed access to unique tourism accommodation for visitors during peak summer months during harvest events. Removing that A1t zone will have a negative impact on all of the above.

To prevent abuse of the A1t zone, the Agri-tourism Accommodation Units could be regulated through the rezoning process for A1t and through the Farm Protection DP. We suggest that these A1t units be restricted to non-farmable areas, as determined under the Farm Protection DP application process. This would provide opportunity for select sites and minimize impacts to farmland and reduce any abuse of the intended use. Specific design parameters could be used that reflect those in the ALC regulations. Other municipalities typically include a table for the number of Agri-tourism Accommodation Units based on the size of the A1 parcel. See the below table for an example of this.

### Agri-Tourism Accommodation<sup>cxvii</sup>

The following regulations apply to agri-tourism accommodation where permitted as a use in this Bylaw:

1. Agri-tourism accommodation is permitted only on a parcel if all or part of the parcel is classified as a “farm” under the *Assessment Act*.
2. Agri-tourism accommodation shall be for short term use by a person up to a maximum stay of 30 consecutive days with 30 days in between any subsequent stay.
3. The number of agri-tourism accommodation sleeping units permitted parcel shall be as follows:

PARCEL AREA	MAXIMUM NUMBER AGRITOURISM ACCOMMODATION SLEEPING UNITS
Less than 4.0 ha	0
4.0 ha to 8.0 ha	5
Greater than 8.0 ha	10

4. All agri-tourism accommodation sleeping units shall be contained under one roof.
5. No agri-tourism accommodation sleeping unit shall have an area of greater than 30.0 m<sup>2</sup>. A washroom is not included as part of the area of the agri-tourism accommodation sleeping unit.
6. No cooking facilities shall be provided for within individual agri-tourism accommodation sleeping units.
7. One (1) parking space per agri-tourism accommodation sleeping unit is required in addition to parking required for the principal single detached dwelling.

*UDI recommends that the City reinstate the provision for Agri-tourism Accommodation Units into the draft Zoning Bylaw.*

## SECTION 11 – SINGLE FAMILY ZONES

UDI recommends several specific changes to this section, including:

- Utilizing a minimum building envelope rather than a minimum site size minimum. The industry uses building envelopes as a standard measure when designing single family lots and it’s a more appropriate way to regulate the developable area of a lot. The exclusion of covenant and setback areas from minimum areas to represent the true building envelope.
- As setbacks are now excluded from minimum size areas, we suggest reviewing the minimum areas for all zones. We propose a minimum of 180 m<sup>2</sup> for RU1 and 150m<sup>2</sup> for RU2.
- For RU4, Sec 11.4, Note 2: As the lot is being subdivided in half, the min width, min area and buildable area should also be half.

## **SECTION 13 – MULTI-FAMILY ZONES**

Through this review process, site specific input was provided by several developers. We are aware of several submissions that have been made to date with no response from the City and there is concern that their input has not been received and considered. We encourage the City to review these submissions and provide responses.

### **Section 13.6 – Density & Height Development Regulations (also apply to Section 14.14)**

There are various locations in the draft bylaw where the maximum achievable bonus height is limited based on the zoning of the neighbouring parcel. UDI believes that the underlying OCP Future Land Use of the neighbouring parcel should be the determining factor, rather than the legacy zoning. Existing zoning that is not in-keeping with the vision of OCP2040 should not arbitrarily limit the development potential of a site.

*For examples, see:*

*Section 13.6, Footnote 1 & 4*

*Section 14.11, Footnote 8*

In table Section 13.6, Density and Height Development Regulations in the MF Zones, there is a footnote that states that “the bonus density and height provisions *may apply* if payment is made...”. This should be changed to “*will apply*”.

See recommendations in Section 2, with applicability to multi-family zones.

See recommendations in Section 14.11 regarding common amenity space, with applicability to multi-family zones.

## **SECTION 14 – CORE AREA & OTHER ZONES**

### **Section 14.11 - Common Amenity Space**

Currently, Zoning Bylaw 8000 requires “private open space” for multi-family development. This space can be comprised of a combination of both private balconies, common indoor and common outdoor space. The new zoning bylaw now requires a minimum amount of “common amenity space”, but excludes private balconies and terraces, while not permitting the use of setback areas. There are a number of concerns with this approach:

- The new regulation is not flexible enough to account for market dynamics. This creates a disincentive to build balconies in favour of creating larger, potentially more wasteful amenity spaces. Large amenity spaces, if not done well, can often be infrequently used, and operational expenses to maintain them raise strata fees and add to the cost of housing.

- The proposed wording does not account for location or the needs of end-users. Some projects warrant additional amenities dependent on proximity to nearby amenities (such as parks, fitness or cultural facilities). Likewise, depending on the target end-user, common amenity spaces can either be attractive or undesirable.
- Common amenities spaces would need to be available to all residents of a project. This would be problematic for a building that mixes condominium and purpose-built rental homes, as amenities spaces would likely not be shared amongst different tenures.
- The current wording ignores private yards commonly associated with townhomes. We believe these spaces are ideal amenity spaces for residents and a value-add for ground-orientated housing.
- Setback areas can be a very viable as common amenity spaces and should not be excluded from being used as common amenity space if site conditions permit.

*UDI Okanagan recommends that the City of Kelowna reintroduce balconies in the calculation of the count to allow flexibility around how best to offer amenity spaces to the intended end-user. We propose that the current private open space requirements are applied to the new zoning bylaw.*

### **Section 14.11 - Upper floor setbacks (at top of podium)**

Similar to the podium height limit within Section 9.11, the required setback should not refer to a number of storeys, but only the nominal height. A number of recently approved projects have designed successful podiums that meet the 16m height, but are five storeys. To achieve a building height-to-street width ratio, the nominal height should be the only relevant measurement.

*UDI recommends the setback requirement should only refer to nominal height, not storeys.*

### **Section 14.14 – Density and Height**

#### **Base & Bonus Densities**

As shared in previous correspondence, UDI continues to encourage the City to increase base densities throughout the residential and mixed-use zones, with particular emphasis on the UC zones. Please see our letter dated February 14, 2022 (Appendix B) for specific rationale and recommendations. Additional density will allow greater flexibility and support positive densification of urban core areas.

Further to this previous correspondence, there is also another rationale for increased base density. The Local Government Act allows DCC's to be paid based on a municipality's projection of their infrastructure that is required to service a specific population. If the population growth is faster than projected in the 20-year OCP horizon and the infrastructure programs are not already in place and approved by the Province by the time a developer is moving a project forward, that developer will not get a DCC rebate for those works. The Zoning Bylaw could compensate for that by having density bonusing correlate to future DCC credits.

*UDI requests a formal response to our previous correspondence related to increasing base zone densities.*

#### **Rental Subzone - Density Bonus**

The addition of density bonusing for rental projects in the second draft is commended. However, we believe the bonus should be commensurate with the base density in the applicable zone rather than having a 0.2-0.3 FAR bonus apply to all zones. For example, the bonus could be higher where base densities and height are permitted and be tied to a percentage of the baseline density. Currently, a 30% FAR bonus is available in the MF2 zone for rental subzone projects (base density of 1.0 + 0.3 rental zone bonus). Where baseline FAR is 3.0 (such as in some UC zoned properties), the same 30% bonus should be 0.9 FAR, rather than 0.3.

*UDI recommends proportional density bonusing for rental projects, commensurate with the base density allowable.*

### **UC1 Zone – Height**

Per feedback during the OCP 2040 process, UDI continues to be concerned about the perceived downzoning of properties within the UC1 zone. We believe it sends the wrong signal to lower any property heights compared to what is currently permitted within today's C7 Zone. The C7 height map was developed as part of the Downtown Plan from 2011. Since that time, a significant amount of investment in mixed-use high-rise development has been experienced downtown, with taller buildings than originally contemplated. It would be counter-productive to reduce heights on certain blocks at this stage.

*UDI recommends no reduction in height from the current C7 zone height map.*

### **UD1 Zone - Density**

Downtown densities should be higher than other UC zones, to account for zero lot-line, street wall development. This development form can yield higher density than less urban conditions. For example, a 12 storey building in Downtown will likely have a higher yield than a 12 storey building in Midtown or Rutland, given the limited setback requirements in UC1.

*UDI recommends UC1 zone base densities should be higher than other UC zones (on a per-height category basis).*

### **Height Maps (UC Zones)**

Overall, there is concern that linking density limits to height maps in the OCP has created a situation where a high-level guideline document is now creating fundamental advantages or disadvantages depending on what side of the height boundary a property is located. For example, a site identified as 14 stories in the OCP has 30% more density potential in the UC5 zone than a neighbouring site identified as 8 storeys (3.0 FAR vs. 2.3 FAR). Same zone, same block, but on the “wrong” side of the height zone boundary. As density cannot be varied, the height maps now become a defining tool to regulate density within an urban centre. We do not believe this was the intent, nor the spirit of the public sentiment during the OCP 2040 consultation process.

In another example, the Ella tower (1588 Ellis), a 20-storey residential tower with an FAR of 6.45, could not be built within the currently proposed UC1 zone if it was located within a 20 storey area on the building height map. The project would not be permissible even with a

prescriptive height bonus as outlined in Section 14.14 (base density of 5.0 FAR with a bonus of up to 5.75 FAR).

This reinforces the notion that the baseline densities in urban centres should be increased to allow for greater flexibility and site maximization, while dealing with the new building height regime. This is critically important if we are to create further emphasis on densifying our urban centres.

*UDI urges staff to consider the restrictive impacts of building height maps and create greater allowances in base and bonus height, as well as density to allow for additional flexibility.*

### **Park Designations (Section 14.14)**

For areas identified as “PARK” in the OCP, a density of 0.5 FAR is noted. This creates a significant issue for a landowner subject to such designation, where the market value for their property is highly diminished. Typically, when the City looks to purchase a site designated as park in the OCP, the underlying market value would be determined by the likely development potential if it was not designated as park (often, adjacent zoning and development potential is a determining factor). We are concerned that this zoning regulation will artificially lower the property value of lands designated as park, thereby reducing the acquisition cost.

*UDI requests clarity on how this new density restriction on park designated properties would impact property value and the municipal land acquisition process to ensure equity to property owners.*

## APPENDIX B

Feb. 14, 2022

City of Kelowna  
1435 Water Street  
Kelowna, BC, V1Y 1J4

### **Attention: Zoning Bylaw Project Team, City of Kelowna**

#### **Subject: Zoning Bylaw Recommendations for Base Density & Height Bonusing**

UDI Okanagan has reviewed the draft base and bonus densities and heights in the City's draft Zoning Bylaw and has come up with some recommended changes. We acknowledge the political pressure associated with height and understand the need to limit height in urban areas. As such, our recommendations below are focused on density within urban centres. Our goal is to ensure adequate supply of housing over the course of the OCP to meet demand, which in turn will impact housing affordability. Our rationale for the recommendations included in the attached appendices is included below.

- The base densities should work without needing to rely on bonus densities to achieve what is already signaled in the OCP.
- Without higher base densities, developers will see little benefit in bonus densities.
- Given our concern in meeting housing demand, we believe it is important to ensure that urban centres are not downzoned as a result of the proposed Zoning Bylaw. Anything that was a C4 but is now zoned C2 has effectively been downzoned. The base density should be higher in this zone to help compensate for that.
- For UC1, all areas designated for lower than 26 stories in height would see a reduction in allowable density. As such, the base densities should be increased to allow for additional flexibility. Many sites downtown have been rezoned to RM6 or C7 in recent years to allow for additional densities to make projects feasible.
- In UC1, the 6.5 base density for 20 storeys recommendation came from the Ella project which was viewed as a suitable and achievable project for this area and is the type of project that should be permitted in the future.
- In UC1, the base density at 26 storeys should be 9 in order to not be downzoned.
- For the new VC zones, we will provide further comment prior to the February 22 feedback deadline.

Please see Appendix A for our recommended base densities and Appendix B for our recommended height bonuses. We welcome further discussion on these recommendations.

Sincerely,

#### **URBAN DEVELOPMENT INSTITUTE OKANAGAN CHAPTER**

Per:

Jennifer Dixon, Executive Director of UDI Okanagan  
Okanagan

Luke Turri, Chair of UDI

cc. Ryan Smith, Divisional Director  
 Doug Gilchrist, CAO

APPENDIX A

Zoning Bylaw Base Density Recommendations

	Draft Zoning Bylaw	UDI Recommendations
Zone	Base Density	Base Density
CA1	1.6	2.35
C2	0.9	1.5
C3 / CA1	1.6	
<b>UC1</b>		
3 storey	1.5	2
6 storey	1.75	2.5
12 storey	3	4.5
20 storey	5	6.5
26 storey	6.5	9
<b>UC2</b>		
3 storey	1.5	2
6 storey	1.75	2.5
12 storey	3	3.5
18 storey	4.5	5
<b>UC3</b>		
3 storey	1.75	2.25
6 storey		
12 storey	3	3.5

18 storey	4.5	5
<b>UC4</b>		
4 storey	1.6	2.35
6 storey	1.75	2.5
12 storey	3	3.5
<b>UC5</b>		
<b>3 storey</b>	1.5	2
<b>4 storey</b>	1.6	2.35
<b>6 storey</b>	1.75	2.5
<b>8 storey</b>	2.3	3.05
<b>14 storey</b>	3	3.75

## APPENDIX B

### Height Bonusing Recommendations

	<b>Draft Zoning Bylaw</b>	<b>UDI Recommendations</b>
<b>Zone</b>	<b>Height Bonus</b>	<b>Height Bonus</b>
<b>UC1</b>		
12 storey	3	6
20 storey	5	10
26 storey	40	40