

Item	
Meeting	2016 July 25

COUNCIL REPORT

TO:

**CITY MANAGER** 

DATE:

2016 July 20

FROM:

DIRECTOR PLANNING AND BUILDING

FILE: Reference:

49500 20 Res# 14-44

SUBJECT:

**REZONING REFERENCE #14-44** 

6050 SUSSEX AVENUE, 4769 HAZEL STREET AND 4759 GRANGE

STREET

HIGH-RISE STRATA APARTMENT, HIGH RISE RENTAL

APARTMENT AND LOW RISE CHURCH RESPONSE TO PUBLIC HEARING ISSUES

**PURPOSE:** 

To respond to issues raised at the Public Hearing for Rezoning Reference #14-44.

#### RECOMMENDATION:

1. THAT a copy of this report be sent to the applicant and those who spoke at, or submitted correspondence to, the Public Hearing for Rezoning Reference #14-44.

#### REPORT

#### 1.0 BACKGROUND

On 2016 May 31, a Public Hearing was held for Rezoning Reference #14-44. The subject rezoning application proposes the construction of two high-rise apartment buildings (a 31 storey purpose built rental apartment building and a 41 storey strata apartment building) with ground oriented townhousing fronting Hazel Street and McMurray Avenue, and a new church fronting Sussex Avenue, in accordance with the Council adopted Metrotown Town Centre Development Plan (see attached Sketches #1 and #2).

At the Public Hearing, 34 written submissions were received and three petitions were submitted representing 402 signatures. It is noted that one of the petitions representing 175 signatures was from a religious and cultural organization representing its members that were opposed to the land sale and replacement of the existing church. Finally, 27 speakers provided oral submissions to the Public Hearing. Of the speakers, a majority were residents of the existing apartment towers within the vicinity of Hazel Street and McMurray Avenue, adjacent to the subject site.

Issues raised included: the adequacy of existing infrastructural services; the capacity of transit, local schools, hospitals and emergency services, parks and recreation complexes; the proposed height and siting of the buildings relative to shadowing, views and privacy; noise and dust during the construction process; increased traffic and the effect on emergency vehicle access; impact of

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proposed rental units on property values, crime and standard of living; and, conformance with the Council adopted Metrotown Town Centre Plan. The following report addresses Council's request to provide further information on the issues raised at the Public Hearing for Rezoning Reference #14-44.

#### 2.0 ISSUES RAISED

Issue #1 - Servicing

Questions were raised regarding the adequacy and funding of infrastructure services to serve the proposed development.

# Response:

As a requirement of the rezoning and subdivision process, a detailed review of all necessary services to serve a site is completed by the Planning and Engineering Departments. The applicant is required to undertake a detailed engineered design and cost estimate of all necessary services to serve the site to City standards. Prior to approval of the rezoning and subdivision, the City requires that all necessary funds, deposits and bonds be made to secure the provision of these services. The applicant is required to hire an approved civil contactor to install the necessary services, and once the servicing has been inspected and approved by the City, the deposited service bonding would be released.

All costs associated with servicing the site for development will be borne solely by the applicant and will not be funded through the City's taxes, amenity fees or other sources of City revenue. In regard to overall area and city wide infrastructure, there is sufficient existing capacity, and/or the opportunity for expansion, to accommodate planned growth within Burnaby's Town Centres and other development plan areas.

# Issue #2 - Capacity of Area Amenities

Concerns were raised regarding whether the capacity of local transit, schools, hospitals and emergency services, recreation/community centres, and parks is adequate to accommodate the residents of the proposed development.

#### Response:

Transit Capacity: With regard to transit capacity, the property is located within the Metrotown Town Centre, which is the best served area of the city in regard to transit. The Metrotown SkyTrain Station, which is currently undergoing a renovation and expansion, is within 800m walking distance from the site. The expansion includes provisions for expanded passenger capacity at the station, enhanced bus service on Central Boulevard, public realm improvements to the station area, and improved pedestrian connections between SkyTrain and bus service. The proposed expansion to the Metrotown SkyTrain Station will increase passenger capacity and

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improve vertical circulation options at the station. SkyTrain service is supported by a comprehensive bus network that is reviewed by Translink on an ongoing basis. Near to the site, bus stops along Kingsway, Nelson Avenue and Willingdon Avenue, via routes 106, 110 and 130 connect the site to the Metrotown SkyTrain Station and bus loop, and to Brentwood Town Centre, Edmonds Town Centre and other areas of burnaby. In addition, the area is well served by major roads including Kingsway, Central Boulevard, Willingdon Avenue, Nelson Avenue and Imperial Street which are identified to accommodate vehicles, pedestrians and cyclists. Overall, the Metrotown Town Centre, and specifically the subject site, is very well served from a transportation point of view.

Schools: Marlborough Elementary which is within 250 m walking distance, and Sardis Elementary which is within 700m walking distance. The nearest secondary school is Moscrop Secondary which is 1.7 km from the site and is accessible by transit. City staff reviews development with the Burnaby School District on a regular basis to confirm enrolment projections. The School District is mandated by the Provincial government to provide spaces to meet student enrolment demands. The Burnaby School District has noted that local schools, including Marlborough Elementary School and Moscrop Secondary School, can accommodate the children that may live in the proposed development. The School District also noted that enrolment fluctuates year to year, with some years higher than others, within individual schools. The Burnaby School District has been able to, and expects to be able to, continue to accommodate new enrolment in Metrotown into the future, as supported and mandated by the Provincial Government.

Hospitals and Emergency Services: With regard to hospitals, Burnaby is served by Burnaby General Hospital, and in some instances Royal Columbian Hospital. Burnaby Hospital is located within 3.125 km driving distance of the subject site. The Provincial Ministry of Health in concert with the Fraser Health Authority determines the location, and staffing of hospital facilities. The City of Burnaby has called on the Fraser Health Authority and the Ministry of Health to address the future improvement/replacement of the Burnaby General Hospital, however, as noted, the determination of hospital improvements is that of the Provincial Government. With regard to Fire Access, Fire Hall #3 is within 600m of the subject site, and Burnaby RCMP Dispatch is within 3.2km of the subject site. While, the BC ambulance service is typically dispatched while vehicles are on the road, the City of Burnaby is advancing an application through the sale of City land to accommodate a new ambulance centre in the Royal Oak Area within 1.8 km driving distance of the subject site. Given the strategic location of the subject site within the Metrotown Town Centre it is proximate to the City's primary hospital and emergency services.

Recreation Capacity: With regard to recreation and community facilities, the subject development is located 750m from the Bonsor Recreation Complex. The Bonsor Complex is one of the City's largest and most comprehensive community facilities, encompassing a full sized gymnasium, fitness centre, pool, and many other art and leisure programming spaces. Adjacent the Bonsor Complex area, there is also the Bonsor 55+ centre, obtained in 2011

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through amenity density bonus funding, which provides additional services and amenities to local seniors. The Bonsor Recreation complex was originally developed in 1986 and renovated in 2005 through amenity density bonus funding, with a further enhancement project currently being advanced on the second level of the facility. As Metrotown continues to grow, it is anticipated that the Bonsor Recreation Centre would continue to be improved and enhanced to meet the community's needs.

In addition to amenities such as the Bonsor 55+ centre and improvements to Bonsor Recreation Complex, the City has obtained several community amenities through the Community Amenity Bonus Program including non-profit office spaces at the Metrotown Community Resource Centre, Pioneer Community Resource Centre and the McKercher Community Resource Office. Currently, amenity bonus funds collected as cash contributions within Metrotown are allocated to the City's Housing Fund (20%) and the Priority Amenity Program (80%). The Priority Amenity Program within Metrotown is identified for use toward a new Metrotown Performance / Event Centre. A new ice rink is also identified under the program for the South Burnaby area.

Parks: The subject site is also served by several neighbourhood, district and major parks including Maywood Park, BC Parkway, Bonsor Park, Central Park, and the Civic Square adjacent to the Metrotown Library. Furthermore, the subject development site is located 800m from Oakland Park, which connects Metrotown to the 207 hectare Deer Lake Park.

In regard to the sufficiency of area amenities, the proposed development, and future growth within the Metrotown Town Centre, will continue to be served by the park, open space, recreational, transit facilities, and other area amenities and services. These areas and services will also continue to be improved, in line with the City's capital and operational budgets, over time.

# Issue #3 - Proposed Building Height and Siting

Concerns were raised regarding the height and siting of the proposed high-rise buildings on the subject site relative to shadowing, views and privacy concerns.

Response:

The subject site currently accommodates two rental apartment buildings, 18 storeys and 15 storeys in height, with a total of 254 rental apartment units (see attached Sketch #3). These existing buildings are located at the northwest corner of McMurray Avenue and Hazel Street and southeast corner of Grange Street and McKercher Avenue. The subject site also accommodates the existing West Burnaby United Church at the corner of Sussex Avenue and Hazel Street. The subject site proposes the addition of two additional apartment towers, with a 41 storey strata apartment building to be sited at the corner of Hazel Street and Sussex Avenue and a 31 storey rental apartment building at the corner of Hazel Street and McKercher Street. The proposed strata building is located 31.1m (102 ft.) (corner-to-corner) from the nearest existing rental tower on-site, 21.3m (70 ft.) (corner-to-corner) from the proposed rental tower on-site and approximately 75m (246 ft.) from the nearest strata apartment building off-site to the south, and

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85m (279 ft.) to the nearest off-site strata apartment building to the west. The proposed new rental building would be located 19.50m (64 ft.) (face-to-face) from the existing rental building on-site to the east, 30.17m (99 ft) (corner-to-corner) from the existing rental building on-site to the north, and approximately 52m (170 ft.) (corner-to-corner) to the nearest strata apartment building off-site to the south. As noted above, a majority of buildings have a corner-to-corner relationship, whereby the buildings are off-set from one another to ensure privacy. Where there are circumstances on-site with a face-to-face relationship, the architecture has been adjusted to reduce the amount of glazing in order to increase privacy. The siting of the proposed additional apartment buildings meets planning guidelines for spatial separation between buildings, and greatly exceeds planning guidelines for the spatial separation between on-site and off-site buildings.

In regard to shadow impacts, given the location of the site on the northern periphery of the town centre, there are no shadow impacts to existing or proposed buildings to the south of the proposed development. Furthermore, given the existing high-rise developments within Metrotown surrounding the site, shadowing from the proposed development is not substantially greater than what exists today. In regard to shadow impacts to properties to the north of the site across Grange Street, they are not affected during the summer solstice and shadows minimally extend off the subject site during the Spring and Fall equinox. However, it is noted that the subject site itself is subject to shadows cast from existing apartment towers to the south and southeast of the site.

In regards to changes in view, while recognizing that the site is intended for high-rise development under the Metrotown Development Plan, the design of the proposed project has sought to maintain sightlines through the development site. Specifically, the proposal has achieved a smaller development floor plate size for the tower forms of 585.29 m<sup>2</sup> (6,300 sq.ft.) and 455.23 m<sup>2</sup> (4,900 sq.ft.) as compared to typical floor plate sizes of 789.68 m<sup>2</sup> (8,500 sq.ft.). This results in a narrower building with a reduced width and depth that allows for sightlines through the site. Staff would note that a lower tower form with a larger floorplate, would result in a significant reduction in sightlines as compared to the subject proposal.

Overall, the scale and siting of the proposed buildings are considered appropriate, given the reasons noted above. It is noted that this development form is consistent with the site's high-density residential designation within the Metrotown Town Centre Development Plan, the City's Official Community Plan and the Metro Vancouver Regional Growth Strategy, which support the accommodation of higher densities in this area related to available public transit, employment, services and other community amenities.

Issue #4 - Construction Impacts to the Surrounding Neighbourhood

Concerns were raised regarding the potential impacts of the construction phase of development to the surrounding neighbourhood, including traffic, noise and dust.

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#### Response:

It is recognized that during the construction phase of any development, there will be some impact to the surrounding area, including traffic, noise and dust. To ensure that impacts to the surrounding neighbourhood are as minimal as possible, the developer will be required to:

- Submit a construction management plan to the Engineering Department prior to commencement of construction. The plan will include an outline on the location of construction access, construction vehicle staging and proposed temporary road closure areas with view to properly manage potential construction impacts within the surrounding neighbourhood;
- Ensure that contractor vehicle parking be accommodated on-site, off-site within permitted parking lots or within permitted on-street parking areas;
- Submit a sediment control plan to the Engineering Department prior to issuance of a building permit to ensure that dust, and other sediment control matters are properly managed; and,
- Ensure that construction and vehicle noise originating from the proposed development site abide by the permitted hours of construction and the Burnaby Noise Bylaw. The Bylaw limits construction activity to the hours of 7:00 a.m. 8:00 p.m., Monday to Friday, and 9:00 a.m. 8:00 p.m. on Saturdays. The Bylaw also limits the level of noise emanating from construction sites to 85 dBAs.

The required construction management plan will further outline the duration of construction, the scheduled timing of various stages of development (e.g. excavation, concrete pouring, material delivery and installation, occupancy, etc.). Staff will work with the applicant to minimize traffic impacts during construction, and will ensure that access to existing developments is not impeded. If roads are required to be closed temporarily for road work or material delivery during construction, flagpersons will be required to appropriately direct traffic. A mechanism to control dust during excavation and construction will also be a component of the construction management plan.

Issue #5 - Increased Traffic and Emergency Vehicle Access

Questions were raised regarding potential traffic generated from the site and its impact on local roads and emergency access.

# Response:

A comprehensive review of traffic and transportation related infrastructure required for the proposed development has been undertaken by City staff within the Planning Department – Transportation Planning Division and Engineering Department – Traffic Division, and a detailed Traffic Study prepared by a traffic engineer is a requirement of the rezoning application. In regard to the subject site's location, the immediately bounding streets include Grange Street, Hazel Street, McMurray Avenue and Sussex Avenue, with McKercher Avenue intended to be

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closed as part of this rezoning application. As noted earlier, in line with the requirements for all multiple-family rezoning applications, the applicant is required to provide all necessary services to serve the site, including road and sidewalk infrastructure. The following is a brief summary of the road network surrounding the subject site:

# Grange Street

Grange Street is designated in the Burnaby Transportation Plan as a secondary arterial, which is intended for, and developed to, a four lane standard with two moving lanes in each direction. On-street parking is prohibited along Grange Street. Higher traffic volumes are anticipated, and are accommodated, on Grange Street with between 12,000 and 40,000 vehicles per day. Traffic counts for Grange Street are estimated to be below 10,000 vehicle movements per day. As a requirement of the subject rezoning application, to improve the public realm environment, the applicant is to provide the Town Centre Standard on the south side of Grange Street across the development frontage, complete with 1.5m treed front boulevard, two-way cycle track, rain garden and concrete sidewalk. Vehicular access to the site from Grange Street is prohibited due to its designation as secondary arterial. Further widening of Grange Street beyond four moving lanes of traffic is not planned, as any widening would primarily serve commuter traffic, further impacting the Burnaby community, and would have limited utility for local circulation.

# Sussex Avenue

Sussex Avenue is designated in the Burnaby Transportation Plan as a bikeway, and functions as a local collector road for vehicles, which is intended for a four lane standard, with the opportunity for two moving lanes in each direction during peak periods and on-street parking during off-peak periods. This road standard is intended to accommodate traffic volumes in the range of 1,000 to 5,000 vehicles per day. Current traffic volumes for Sussex Avenue are estimated to be below 3,000 vehicles per day. As a requirement of the subject rezoning application, to improve the public realm environment, the applicant is to provide the Town Centre Standard on the east side of Sussex Avenue across the development frontage, complete with treed front boulevard, one-way cycle track, rain garden and concrete sidewalk. Vehicular access to the site from Sussex Avenue is prohibited due to its designation as a bikeway. Further widening of Sussex Avenue beyond four moving lanes of traffic is not planned, as is not considered appropriate given Sussex Avenue's designation as a local residential road north of Grange Street.

#### McMurray Avenue

McMurray Avenue is designated in the Burnaby Transportation Plan as a local road, but currently functions as a local collector and has been developed to a four lane standard, with the opportunity for two moving lanes in each direction during peak periods and on-street parking during off-peak periods. This road standard is intended to accommodate traffic volumes in the range of 1,000 to 5,000 vehicles per day. Current traffic volumes for Sussex Avenue are estimated to be below 3,500 vehicles per day. As a requirement of the subject rezoning

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application, to improve the public realm environment, the applicant is to provide the Town Centre Standard on the west side of McMurray Avenue across the development frontage, complete with treed front boulevard, one-way cycle track, rain garden and concrete sidewalk. Vehicular access to the site is permitted from McMurray Avenue via the existing driveway, which will serve both the existing rental buildings and the proposed new rental building. Further widening of McMurray Avenue beyond four moving lanes of traffic is not planned, as currently McMurray Avenue functions as a collector for a short distance between Kingsway and Grange Street.

#### **Hazel Street**

Hazel Street is designated under the Burnaby Transportation Plan as a local road, which is intended for, and has been developed to, a single lane standard (accommodating two passing vehicles), with additional pavement for on-street parking. This road standard is intended to accommodate traffic volumes of less than 3,000 vehicles per day. Expected traffic counts for Hazel Street are estimated to be below 2,500 vehicle movements per day. As a requirement of the subject rezoning application, to improve the public realm environment, the applicant is to provide the Town Centre Standard on the north side of Hazel Street across the development frontage, complete with treed front boulevard with curb bulge rain gardens, combined sidewalk and cycle track. Vehicular access to the site is permitted from Hazel Street via two new driveways, which will independently serve the proposed new rental building and the proposed new strata building. Further widening of Hazel Street beyond its local road designation is not planned, as its current configuration is anticipated to accommodate current and future traffic.

Questions were raised regarding the painting of "penalty boxes" or cross hatch markings at driveways to improve sightlines, and ensure ease of access and egress from existing residential developments. It is noted that the use of "penalty boxes" is typically used for access and egress for emergency vehicles, such as fire trucks leaving or entering fire stations or restricted areas. The use of "penalty boxes" is not generally supported for driveway entrances. Notwithstanding, this, and the other traffic, parking and driveway sightline issues raised at Public Hearing regarding will be forwarded to the Engineering Department – Traffic Division for review.

Further questions have been raised regarding the capacity of surrounding roadways to accommodate emergency vehicles. It is noted that Fire Hall #3 is within 600m of the subject site, Burnaby General Hospital is within 3.0km of the subject site and Burnaby RCMP Dispatch is within 3.2km of the subject site. Given the central location of the subject site, first responders do not report any concerns in responding to emergency calls that are generated from the proposed development or surrounding developments within the area. The roads bounding the subject site have been reviewed and are of sufficient capacity to accommodate emergency vehicles serving the proposed development and any anticipated growth as a result of development in the Metrotown Town Centre. Furthermore the Fire Department has the opportunity to use pre-emptive signals to change a signal to a green cycle to increase response times together with lights and sirens to access properties in the area.

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Issue #6 - Rental Housing

Concerns were raised regarding the impact of proposed rental units on property values, noise, crime and standard of living.

# Response:

Several speakers at the public hearing raised concerns regarding the proposed rental use, including concerns regarding increased noise due to children playing outdoors. It is noted that all properties designated for multiple-family development in the City of Burnaby could accommodate either purpose built rental housing or stratified housing where individual units are owned, and may also be rented subject to strata bylaws. The City does not, restrict sites from being developed for the purposes of rental housing, and actively works with applicants toward future private investment opportunities in rental housing throughout Burnaby.

In regard to increased crime as a result of rental housing development, staff do not have evidence of a documented relationship between crime, noise or substandard levels of maintenance, whether a new development is proposed to be rental or strata. In a review of crime statistics with the Burnaby RCMP, it is noted that there is no greater proportion of calls for service to the existing rental buildings at 4769 Hazel Street and 4758 Grange Street, vs. that of surrounding strata buildings. As such, calls for service to the proposed new rental building are expected to reflect existing levels for similar development in the area.

In regard to the standard to which a rental building is maintained, that is a result of the efforts of the individual property management companies and their standards of maintenance guidelines. The existing rental buildings on the subject site were constructed in 1969, well before any of the strata multiple family developments surrounding it were constructed and have been maintained to a high level with recent replacement of windows and roofing as well as improvements to the ground floor amenity areas. The rental developer is Bentall Kennedy, which is one of the country's largest, and long standing, real estate investment firms. The current owner and financier of the rental property is BC Investment Management Corporation (BC IMC), which is a public sector pension fund who manages over \$123.6 billion in assets globally. Given the positive maintenance history of the existing rental buildings on subject site, there is confidence that Bentall Kennedy and BC IMC will be committed to the long term maintenance and appropriate standards of property management for the new rental building proposed for the site. Finally, it is noted that of the stratified housing units developed within the City of Burnaby, approximately 25% are purchased for investment purposes, which is reflective of the overall purpose of these developments to accommodate residents, both owners or renters in Burnaby. As such, the rental component of the development is consistent with the Metrotown Town Centre Development Plan's CD (RM5s) zoning designation, and is also considered supportable and encouraged given the high-quality architectural design and amenity features proposed.

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Issue #7 - Conformance with the Community Plan

The Council adopted Metrotown Town Centre Development Plan designates subject site for high density apartment development under the CD Comprehensive Development District, utilizing the RM5s Multiple Family Residential District as a guideline. In terms of the governing allowable density for the site, the maximum allowable residential floor area ratio (FAR) would be 5.0 FAR applicable to the net site, which is inclusive of a 1.6 FAR amenity bonus.

The subject site obtained its first multiple-family land use designation in 1969 as part of Apartment Study Area L, and subsequently Community Plan 4, which specifically designated the site for High Density residential uses, as well as recognized the prevailing institutional (church) use of the site. In 1977, The Metrotown Development Plan was adopted by Council which established an overall guide plan for the Town Centre. The subject site is located within Sub Area 1 – the Core of the Metrotown Plan, which is identified in the plan for the highest order of activity and development intensity.

The organizing principles of the plan note that mixed uses are encouraged throughout the plan area, but primarily within the Core. The plan notes that the Core is to be characterized by the promotion of a mixed-use environment, which will integrate the full range of urban facilities including, office, retail commercial, apartment, civic, institutional, cultural, social, entertainment, transit, parking, open space and pedestrian facilities.

The existing West Burnaby United Church is on the City's preliminary Heritage Inventory. However, the church has requested to demolish the existing building as the congregation space is too large for their needs and requires substantial annual maintenance that is unsustainable. Furthermore the function of the church has changed over time from strictly a religious space to a space that accommodates a greater public service role including the distribution of food bank services, which would be made more efficient through the site's redevelopment.

A detailed heritage assessment of the site has been completed by a qualified heritage consultant and the Burnaby Heritage Commission has been informed of the building's demolition. The new church building is to be located at the corner of Sussex Avenue and Grange Street, which will be fully owned by the United Church by way of an airspace parcel, which is a volumetric parcel, whether or not occupied in whole or in part by a building or other structure, shown as such in an air space plan as defined by the BC Land Title Act. The use of an airspace parcel subdivision allows two separate titled entities to share in the maintenance of common areas, but does not require consent from one another to maintain or improve the structures within their individual legal parcels.

The mixed institutional and residential development proposed for the subject site is fully concordant with Core designation of the Metrotown Development plan and all other relevant polices governing land use in the Metrotown area. Furthermore, the site's improvement with new purpose built rental housing, new strata housing, and a new church and community service facility contributes to the advancement of the City's plans for the area.

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# 3.0 CONCLUSION

The development proposal for the subject rezoning application (Rezoning Reference #14-44) is for the construction of two high-rise apartment buildings (31 storey rental apartment building and 41 storey strata apartment building) with ground oriented townhousing fronting Hazel Street and McMurray Avenue, and a new church fronting Sussex Avenue, within the Council adopted Metrotown Town Centre Plan area. The proposal is fully concordant with the adopted Plan, is high quality in its architecture and landscaping treatment, and is considered beneficial to the neighbourhood through its provision of rental, church and community service uses.

This report provides information responding to questions raised at the Public Hearing, including those related to the adequacy of existing infrastructural services; the capacity of transit, local schools, hospitals and emergency services, parks and recreation complexes; the proposed height and siting of the buildings and their impacts on shadowing, views and privacy; noise and dust during the construction process; increased traffic and the effect on emergency vehicle access; impact of proposed rental units on property values, crime and standard of living; and, conformance with the Council adopted Metrotown Town Centre Plan.

As a condition of Final Adoption of the rezoning, the developer will be required to complete the required prerequisites of the subject rezoning application, as well as obtain the necessary City approvals and permits.

It is recommended that a copy of this report, be sent to the applicant and those who spoke at, or submitted correspondence to, the Public Hearing for Rezoning Reference #14-44.

Lou Pelletier, Director

PLANNING AND BUILDING

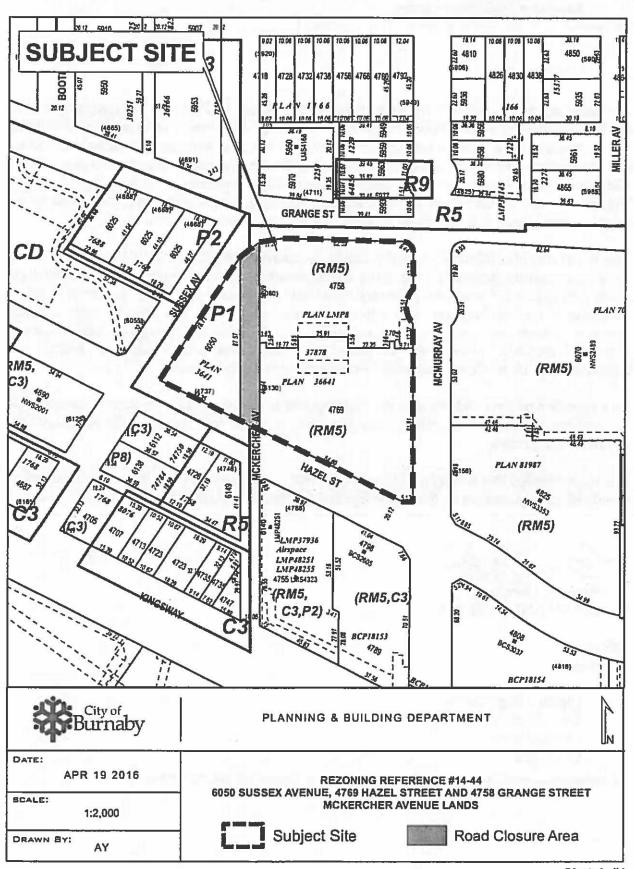
JBS:spf
Attachments

cc: Director Engineering

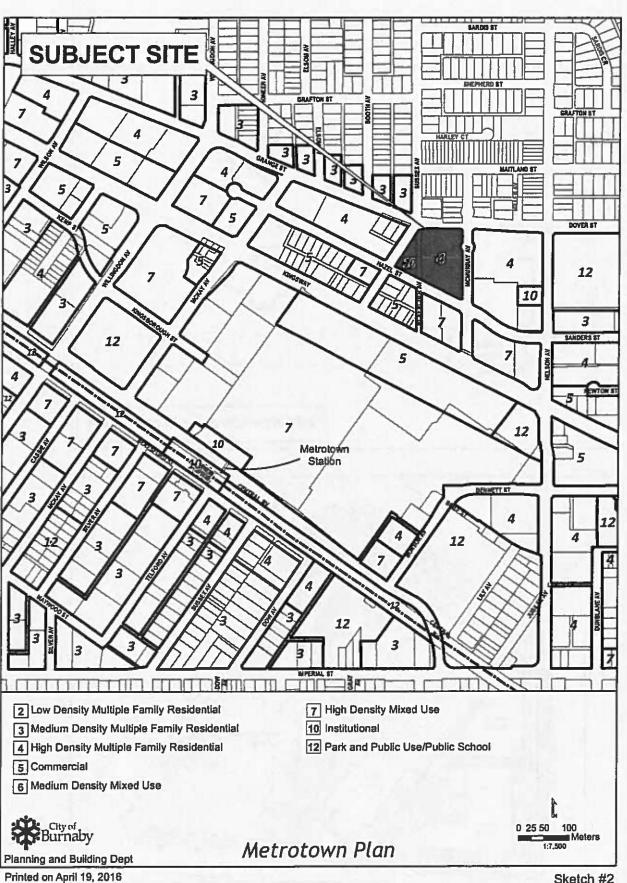
Chief Building Inspector

City Solicitor City Clerk

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Sketch #1



Sketch #2

# 7.18.

