



Heritage Vancouver

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October 11, 2017

Andrew Wroblewski, Project Facilitator

RE: 105 Keefer Street DP-2017-00681

Dear Mr. Wroblewski,

Over the past two years, we have written four letters and spoken at public hearing on the various iterations of the proposal for 105 Keefer questioning what the proposed development does for the context of Chinatown as a place for people with distinct ways of life. As this development goes to Development Permit Board on October 30, 2017, we maintain our strongest opposition to the development in its current form.

We believe this project does not meaningfully reflect the values of its unique Chinatown context and does little to encourage placemaking that will enhance and encourage these values. It does not reflect best practices in heritage management and does not align with clearly identified and stated City of Vancouver planning goals for the area.

The large public turnout for the recent public hearing that extended three evenings and a day has raised massive concerns over what is appropriate for the context of Chinatown and the DTES. If it was not evident that sensitivity to the neighbourhood context was crucial to a large number of people before the public hearing, it certainly is now.

The building has now been lowered by three stories for this development application. However the reduction in height does little to address the actual reason why people demanded the rezoning be rejected. Accordingly, the approval of this development faces an extremely large burden of justification related to the uniqueness of its context that is not reflected in the zoning rules.

Chinatown has distinct ways of life and a sustained relationship between culture and place that has been identified in multiple planning documents; this is not necessarily captured in the “as of right” zoning rules. Even a short survey of relevant planning documents reveals that the City of Vancouver has identified this uniqueness of place in multiple ways:

From the Downtown Eastside Social Impact Assessment, 2014

The heritage assets of the DTES are significant, both in terms of the spiritual memories and intangible values... p. 36

Whether or not a development fits with its surrounding community affects vulnerable residents' sense of community, belonging and inclusion. p.38

Whether or not the historic and cultural aspects of the neighbourhood are preserved could affect residents' connection to the area in which they live. P.38

From the Downtown Eastside Plan, 18.3.1, p. 187

Investigate best practices in other cities to provide lessons on how to ensure sustainable community development through meaningful community engagement and partnership arrangements

From the June 1, 2015 Administrative Report to Vancouver City Council from the General Manager of Planning and Development Services on the Heritage Action Plan Update, RTS No. 10654

The approach to identifying heritage resources changed significantly in the early 2000s through a national effort known as the Historic Places Initiative (HPI) which also created a National Heritage Register. This work recognized international best practices by adopting a community values based approach encompassing historical, cultural, aesthetic, scientific, and educational values. In addition, the initiative noted that many community values have intangible qualities and significance, such as community traditions or spiritual values, and it asserted that those also need to be identified and evaluated. These values manifest themselves into themes which help to describe a society's collective cultural history and assist in identifying key heritage features. This approach as outlined in the national HPI initiative is being utilized in the review of the Heritage Program and Upgrading of the Heritage Register which is now underway.

From the Chinatown Neighbourhood Plan & Economic Revitalization Strategy, p. 18

The {Chinatown} Statement of Significance describes heritage value in a broader sense, including historic, aesthetic, scientific, educational, cultural, social, and spiritual significance. This tool is particularly applicable to Chinatown, a neighbourhood whose heritage value lies not only in its physical environment, but also in its cultural activities and social networks.

Also from the Chinatown Neighbourhood Plan & Economic Revitalization Strategy, p.6

To remain economically competitive, it must do so without losing its culture and heritage - assets that define its identity and set it apart from other neighbourhoods.

Best practices on approaches to heritage, which encompass the understanding of the multitude of values that are important to communities, AND meaningful involvement of communities in development and planning, have existed for decades. In addition to the city referencing them in its own documents, these best practices are well documented in numerous national and international documents and they also form the basis for heritage management in cities across the world. If the city is truly committed to protecting the character of Chinatown and recognizing Chinatown as an invaluable part of Vancouver's culture and heritage¹, then it needs to follow its own planning documents and take **credible action**. This is particularly true for a site where there is ample and unequivocal evidence that cultural and social context matter immensely.

We believe that development on this site could greatly contribute to the neighbourhood and surrounding area. However, this current proposal does very little to follow best practices and the spirit of the Chinatown Neighbourhood Plan and Economic Revitalization Strategy, the Downtown Eastside Plan, and the Downtown Eastside Social Impact Assessment- planning documents that strive to capture that which zoning does not.

We strongly encourage the development permit board to reject this application. We also strongly encourage the City of Vancouver to explore and implement an alternative development path that will allow this unique site to be developed with the active participation of the local community into a project that truly reflects and enhances the values of this unique place.

Sincerely,



Bill Yuen
Manager, Heritage Vancouver Society

¹ See Chinatown Development Policy Changes – progress update from staff to community dated July 5, 2017