



## Heritage Vancouver

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May 22, 2017

Mayor Robertson and Vancouver City Council  
453 W.12<sup>th</sup> Ave.  
Vancouver, BC V5Y 1V4

Dear Mayor and Council,

Re: 105 Keefer Public Hearing

Over the past year and a half, we have commented on three iterations of the proposal for 105 Keefer and have repeatedly questioned what the proposed development does for the context of Chinatown as a place for people with distinct ways of life. As the proposal goes to public hearing on May 23, we maintain our strongest opposition.

For almost 20 years, international policy and principles for sustainable cities have emphasized that new development in historic districts should fit into the physical place, and contribute to the everyday lives of people who work and live in these areas. We are gravely concerned about the lack of a meaningful relationship between this proposed development and the built and human environment in Chinatown, and the consequent threat to the integrity of the cultural landscape. Parks Canada Standards and Guidelines for Historic Places defines cultural landscape as “any geographical area that has been modified, influenced or given special cultural meaning by people, and that has been formally recognized for its heritage value. Cultural landscapes are often dynamic, living entities that continually change because of natural and human-influenced social, economic and cultural processes.”

As pointed out previously, while visual relationships are important and the various iterations of this proposal have tried to address them, the pattern of land use and how people live their lives in this area are significant character defining elements that the proposal fails to address. New development needs to respect the values that have shaped the cultural landscape and are integral to its significance for all Vancouverites. The rapid socio-economic change and displacement the proposed development will unavoidably bring, especially taken together with the three large scale developments nearby along Main (developments on 129 Keefer and 134 Keefer are upcoming), directly threaten the integrity and values of the cultural landscape. UNESCO’s Vienna Memorandum is a useful basis for these views. Now twelve years old, the memorandum marked an important milestone in understanding that historic districts must be approached holistically with an emphasis on the compatibility of contemporary architecture with all aspects of cultural landscapes, including cultural

practices, and new development must not harm local ways of life, i.e. retain authenticity and foster socially sustainable historic districts.

In the April 18, 2017 report to Vancouver City Council recommending 105 Keefer be referred to public hearing and approved, the section on public input states, “others noted that there are ‘intangibles’ which also contribute to the unique Chinatown character, such as the people and activities.” We are disturbed that staff and the report fail to note the significance of “intangibles” in arriving at its recommendation despite their prominence in planning documents.

These “intangibles” -connecting to ones’ culture, loss of affordable retail, losing critical connections- are noted in the Downtown Eastside Social Impact Assessment. The words “spiritual”, “social”, “cultural meaning”, “non-physical”, “intangible values”, and “intangible heritage” appear throughout the Downtown Eastside Plan. “A neighbourhood whose heritage value lies... also in its cultural activities and social networks” and “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” stand out in the Chinatown Neighbourhood Plan.

The City’s plan and policies indicate that Chinatown needs to be more than a mere collection of historic buildings (i.e. dead artefacts) but rather a rich cultural area where the tangible and intangible work together to sustain an authentic historic place that is distinct from other neighbourhoods. If this is truly the City’s purpose, then Council and staff must move beyond empty policy statements and their lack of implementation. The City must focus on sustaining these qualities that are integral to why Chinatown is significant through better policies, and real commitment to apply them in development applications. The City needs to question how developments such as 105 Keefer contribute to the whole beyond economic measures and engages living human beings in the way they perceive and inhabit the area. We call upon the City to return to an approach to city-building that is humanist. Humanism has deep roots in urban design theory and practice (e.g. Kevin Lynch), and the City’s own planning history of people-first urban and social development in the ‘City Plans’ era.

Our last point concerns community buy-in. One of the strongest points in the Vienna Memorandum is that decisions should be made through participatory planning and the consent of the local community. City staff, and Urban Design Panel, have approved this project and deemed it appropriate for the Chinatown community. This is despite the intense opposition for the past two years (the volume of arguments against the development are well-documented in the report) expressing that many community members feel this project does not meet their needs. Making a decision without support of people sustaining the social, cultural and historical values of Chinatown, simply through living their everyday lives, is not best practice for cultural landscapes, nor best practice in community planning.

Perhaps people understand place differently. People who have their livelihoods and homes in the area do not make sense of place as HA-1 and HA-1A, 7.04 FSR, LEED Gold, CD-1, Public Art Policy for Rezoned Developments, elevations, vertical façade elements, and “the massing concept and architectural language should reflect the dominant north south grain of the built form of Chinatown” in Appendix E. If people

see Chinatown as where they feel comfortable and safe, where they can eat affordably, where they can experience Chinese-Canadian culture, where young and old interact, and where they have access to culturally- and language-specific shops and services, then these perspectives need to be included. This is not simply inclusion through consultation, but through access to planning and inclusion in decision making.

This level of inclusion and participatory planning is not a radical concept. They are an integral part of a values-based approach to heritage. “Enhancing inclusive and sustainable urbanization and capacity for participatory, integrated and sustainable human settlement planning and management” is part of Goal 11 of the 2016 UN Sustainable Development Goals, and inclusivity is a key theme of the 2016 UN Habitat III New Urban Agenda.

Our view is that “heritage” and continuous evolution of historic places through development can and should be mutually reinforcing. By respecting and protecting the way of life of people in a particular place, development can enhance historic districts as built and human environments which are equally essential to sustain, and build upon, the valued sense of place. However, we do not see these merits in this proposal, and at worst, that severe and irretrievable harm to the fragile integrity of Chinatown’s cultural landscape will be done.

#### References

Vienna Memorandum on “World Heritage and Contemporary Architecture- Managing the Historic Urban Landscape”

<http://whc.unesco.org/en/documents/5965>

UN Sustainable Development Goal 11 (in particular 11.3, 11.3.2, 11.4)

<https://sustainabledevelopment.un.org/sdg11>

Sincerely,

Bill Yuen, Manager, Heritage Vancouver Society and the Board of Directors of Heritage Vancouver Society

Cc Gil Kelley, General manager of Planning, Urban Design, and Sustainability  
Karen Hoese, Acting Assistant Director, Downtown  
Chinatown Planning Team