



Heritage Vancouver

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November 23, 2017
Lisa King, Project Facilitator

Dear Ms. King,

We are writing on behalf of our membership to oppose the proposed redevelopment at 33 West Cordova of the historic Stanley Hotel and the New Fountain Hotel, both of which are on the Vancouver Heritage Register as well as being designated since 1971. We are concerned that the project in its present form will still have significant negative impacts on the Gastown area, an important, designated heritage neighbourhood and a National Historic Site of Canada.

We have written about this project before ([July 12 2016](#)) and we observe that some of our concerns have been addressed, most notably the removal of the liquor primary 600 seat nightclub. This also includes the relocated massing so as to better address the historic “sawtooth” urban profile typical to the area and also potentially reducing shadowing of Blood Alley.

Despite these improvements we still cannot support the proposal. Still unaddressed is the fact that this project appears to still require a relaxation of approximately 6 storeys beyond the HA-2 22.9m/75’ height limit in order to proceed. This is essentially doubling the allowable height on a site that is directly blocking sun and light access to the potentially revitalized public spaces around Blood Alley- areas which could become critical regenerative elements in the Gastown historic area. Gastown is a designated heritage area and is zoned to limit height and maintain the feel of a historic urban district. Doubling the allowable height on this important site in order to achieve additional market rental is not a fair trade off and may have unintended consequences on related City of Vancouver projects in the area such as the Blood Alley revitalization project.

While we still appreciate the proponent's efforts to renovate and provide important rental and social housing assets we feel that the negative impacts on Gastown's heritage feel, public spaces and urban fabric completely outweigh the positive aspects of the project. Specifically, we note that the project still does not abide by the guidelines in the HA-2 District Schedule, the Gastown HA-2 Design Guidelines, or the Standards and Guidelines for the Conservation of Historic Places in Canada with respect to:

- the demolition of the two designated buildings (facade retention is not best practice for heritage retention)
- the poor level of overall conservation of retained material

- overall massing and height (well above zoning limits)

While we recognize the proponent has made improvements to the non-zoning related improvements we feel that the City of Vancouver needs to stick to the established rules with respect to height in order to maintain the Gastown “urban memory bank” of how Vancouver used to look and feel and how the Downtown Eastside Plan envisions Gastown to look and feel into the future. Our review of this project remains that it cannot be just revised into conformance, and that it must be fundamentally re-structured to achieve complex heritage requirements and urban design goals as this site cannot support this level of density.

Furthermore, we note that these fundamental challenges to the HA-1 and HA-2 frameworks must stop. Very little of what was proposed by the Gastown Heritage Management Plan has been implemented including the incentive package.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Yuen', with a stylized, cursive script.

Bill Yuen
Executive Director, Heritage Vancouver Society