



## Heritage Vancouver

www.heritagevancouver.org  
info@heritagevancouver.org  
604 254 9411

PO Box 74123, Hillcrest Park PO  
Vancouver BC V6G 3E1  
Canada

March 30, 2017

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

Dear Mayor and Council,

Re: Chinatown Development Policies Review

Thank you for the opportunity to comment on the Chinatown Economic Revitalization Update and Improvements to Development Policies. While Heritage Vancouver finds some proposed policy recommendations generally supportable, we find some recommendations, particularly the introduction of 200 foot-wide frontages, troubling. Additionally, as mentioned in our previous letter on the latest application for the proposed rezoning for 105 Keefer (submitted February 23, 2017), we find that existing policy is failing to reach the agreed upon goals for the area and ask for a major rethink of how to address development in line with those goals, accompanied by policies that reflect that.

### **On maximum density and maximum number of floors, height, 200 feet frontages**

We have now witnessed two extremely out-of-scale developments as products of the Historic Area Height Review (HAHR) policy which are not necessarily contributing in the manner that is called for in the Chinatown Neighbourhood Plan. Therefore, we generally agree that FSR and a maximum number of floors be set. The proposal for shop frontages of a maximum of 50 feet would help the fine grain of the streets of Chinatown that provides for a human scale experience of street activity. We are cautious of lot assemblies that detract from the existing building patterns that make the streets an interesting experience in Chinatown. With respect to the 200 feet building frontages, existing rezoning projects and proposed ones are already out of scale and pointed out by many to be a problem. P. 7 of the City of Vancouver Open House boards calls this a current challenge; allowing extremely out of scale lot assemblies of up to 200 feet to make way for megadevelopments with extremely out of scale heights of 120-150 feet would pose even bigger challenges.

Concerning height, we reiterate our comments on the HAHR back in 2010: the 90 feet to 150 feet heights proposed for several areas in Chinatown are out of scale and contrary to planning that seeks to preserve the special character of Chinatown streetscapes and a National Historic Site. Such extremely out-of-scale height is not appropriate to define the termination of street views, nodes of high activity, boundaries or other related functions. This is because the role of historic buildings in

the historic precinct is to serve as landmarks, not a backdrop to new architecture that “punctuates” the skyline.

Even if we were to find out-of-scale heights supportable, it should, at a minimum, “support innovative heritage, cultural and affordable housing projects”, as stated under Historic Area Height Review: Policy Implementation of Chinatown Related Items. As of yet, we find no project, either completed or proposed, that has been granted or has requested additional height, meets said innovation.

### **On the Economic Revitalization Strategy**

As more and more development pressure has come upon Chinatown, it is imperative to broaden the understanding of heritage. The concept that heritage is comprised of a multitude of values and does not simply reside solely in an object is neither new nor unusual. It has been encouraging to hear City planning staff speak of the intangible and cultural elements that comprise heritage but nonetheless, this has not been reflected in planning policies nor improvements proposed which continue to centre heritage predominantly around architecture. (A case in point would be P.7 of the related City of Vancouver boards where under the heading of heritage, it shows that for the current challenge of “Overall loss of Chinatown character”, the proposed improvement is “Enhance protection of heritage properties.” Heritage is also translated into “traditional architecture” in Chinese.)

The society buildings and the other architecturally significant buildings are no doubt of significance but a much more robust, holistic and updated manner in which heritage is treated involves looking at those buildings (and any other ones) in relation to people, social customs, daily rituals, and the surrounding environment with a focus on the layers that have accumulated until now. The International Council on Monuments and Sites (ICOMOS) classifies this kind of partnership between people and place like in Chinatown as one type of Cultural Landscape. Kensington Market in Toronto would be another example.

Much effort is put into the design of new developments so that the project meets some yardstick for an aesthetic that is appropriate for a Chinatown. This is a neighbourhood that is low income, has a distinct culture, and can offer immense social benefit for the city and everyone who visits. It is a community that really needs design expertise to enhance the quality of the human environment for all and to enable the rituals, customs, and social interactions of day to day life specific to Chinatown to be experienced by all. This type of community interest design needs to be encouraged and incentivized just as much, if not more.

Although the proposed inclusionary zoning policy is an example of an attempt at the above, it addresses a small fraction of the number of seniors housing needed and if it takes away community input into rezonings at public hearings, that may not be a desirable outcome when community voice is especially necessary in the face of considerable development pressure in Chinatown. Additionally, the difference between the number of new units and the number of new units that are affordable for the income level of the area is quite considerable.

The increase in the number of residents in Chinatown has been suggested to be a successful part of the economic revitalization strategy thus far. This residential intensification may bring new residents, new businesses, and activity to the area, but we have strong concerns that this form of revitalization is decontextualized from the cultural, social and economic environment. We view revitalization to mean economic development that coexists with heritage and social development in a manner that enhances the quality of the human environment not just for new higher income residents, but those who are finding it increasingly challenging to remain. We believe this is the spirit of the Chinatown Neighbourhood Plan and Economic Revitalization Strategy. We urge the City of Vancouver to revise its development policies in Chinatown to reflect this goal.

The continued deterioration of the cultural and social fabric of Chinatown would, for Vancouver, in the words of UNESCO, “constitute a harmful impoverishment of heritage.” The situation is not zero sum: economic development does not need to happen at the expense of heritage and social development. We look to the City of Vancouver to put forward new innovative policies with an expanded toolkit encompassing different disciplines for urban heritage revitalization so that the tangible and intangible cultural heritage of Chinatown can be sustained.

Sincerely,

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

Bill Yuen  
Manager, Heritage Vancouver Society

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