



# Heritage Vancouver

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September 17, 2018

Mayor Robertson and Vancouver City Council  
Vancouver City Hall  
453 West 12th Avenue  
Vancouver BC V5V 1V4

Dear Mayor and Council:

We are writing on behalf of our membership to provide comment on the proposed RS duplex zoning changes. Although we are generally supportive of densifying our RS neighbourhoods, due to the lack of consultation with the heritage community and potential loss of heritage assets we cannot support the proposed zoning policy amendments at this time.

We support adding “gentle density” and exploring options to encourage the “missing middle” in RS zones, and Vancouver in general, providing these policies effectively enhance neighbourhood character, affordability and increase housing options. In our view, enhancing neighbourhood character includes identifying, protecting and restoring historic and heritage assets. At this time, we observe that the proposed duplex zoning has no mechanism to protect against this potential loss, and in fact may accelerate it.

We therefore urge council to amend this particular policy to include effective provisions for identifying, protecting and restoring historic and heritage assets. We also urge council to direct staff to engage the heritage community in the Making Room program as it progresses.

In particular we are concerned that the current iteration of the proposed RS changes will have the following unintended negative outcomes:

1. Immediate loss of unidentified and unprotected historically important heritage properties within the RS neighbourhoods (ie historic farmhouses, architecturally significant homes, wartime bungalows, groupings of character homes etc). This identification work (including the Heritage Register Upgrade as part of the Heritage Action Plan in the identification of specific heritage resources which remains incomplete) is necessary particularly when incentivizing broad change across the city.
2. Immediate conflicts with the existing character retention policy. This could lead to potentially increased demolitions and a loss of neighbourhood character/homes that the character retention policy approved by Council in October 2017 set out to protect. This is due to the new duplex route potentially having an easier and cheaper City approvals process and construction effort, and perhaps less effective character retention incentives.
3. Limiting the creation of “future heritage” due to prescriptive design guidelines that will restrict design options and encourage cookie cutter development.
4. Potentially increasing loss of overall neighbourhood density and character due to replacement of multi-generational and other multi-resident homes with expensive boutique strata titled duplex units which may actually reduce the number of people living on a given lot.

If the intent of this policy is to increase housing options and build community in RS zones we observe that it fails to plan for many of the tangible and intangible elements that could actually enhance neighbourhood character, (ie small scale local serving retail such as St George Market, Union Market), tree and streetscape management, block by block place making opportunities, supporting neighbourhood cultural activities, and many others.

While we acknowledge that this policy may increase housing options, it concerns us that the standard model of boutique duplexes that make up the majority of the current new duplex builds do not currently provide affordable housing options for all but the fortunate few.

With the above in mind we strongly encourage City Council to immediately amend this policy to include effective provisions for identifying, protecting and restoring historic and heritage assets and direct staff to carry out the following specific action items:

1. Consider how the Making Room policy can retain and enhance individual neighbourhood character and cultures through assessment of the different tangible and intangible elements that make up neighbourhood character including allowing commercial and duplex/multiplex uses/zoning.
2. Instruct staff to ensure that design guidelines are developed in a manner that allows for the creation of sympathetic development and not just replication; that is to say to make room for the creation of future heritage.
3. Engage the heritage community including the Heritage Commission, Heritage Vancouver Society and the Vancouver Heritage Foundation and other heritage groups in the further development of the overall Making Room program.
4. We also encourage the City to complete work on the Heritage Action Plan including the Heritage Register upgrade in order to help identify and protect individual heritage assets in the RS zones.

We would be pleased to engage with the City in additional dialogue to help achieve these outcomes.

Thank you for your attention in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Javier'.

Javier Campos  
President, Heritage Vancouver Society