



Heritage Vancouver

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September 14, 2023
Mayor Sim and Vancouver City Council
Vancouver City Hall
453 West 12th Avenue
Vancouver BC V5V 1V4

Re: Proposed Zoning Amendments For Missing Middle Housing

Dear Mayor and Council,

The proposed missing middle amendments will change the zoning for a large geographic area in the city currently having mostly single detached houses. We have read and heard concerns over the loss of character and heritage houses in the RS zones. We hope that this submission can be useful in thinking about heritage and change in these neighbourhoods.

Because the incentives to demolish heritage and character houses to build multiplexes are greater than the incentives to retain, one of the suggestions brought forward to incentivize retention is to match the 1.0 FSR proposed for multiplexes. For example, the developer James Evans who undertakes missing middle developments involving character and heritage houses spoke about this in the August 4, 2023 article *Vancouver's New Multiplex Rules Could Stunt Stealth Density Projects in the Globe and Mail*.

We do not know the reason why the proposal does not match the 1.0 FSR given to multiplexes, but we would support character and heritage houses having the same FSR incentive for retention. Perhaps further increasing FSR on sites with character and heritage buildings to 1.0, introduces some challenges with siting, building codes and even conservation principles. In this regard, we believe that it would be good for the City to allow flexibility so that architects and developers working on heritage and character house sites can exercise some creativity in looking for alternative solutions.

One of the largest issues concerning heritage and change in communities is the question of what is important from the past to protect and what to let go. A heritage register system, like the Vancouver Heritage Register, is conceived to do that by identifying what is significant, largely from a historic building and architectural perspective. The register largely privileges those perspectives and it does not capture many things that people who are not heritage building conservation professionals would consider significant. But it does identify certain aspects of the city's history and building traditions.

The proposal (along with the Vancouver Plan) starts a process of introducing large changes to land use in the city by incentivizing things to be removed so that new things can be put in, but it is largely silent on the register and potential loss of sites

on the register. Which leads to the bigger question about heritage in relation to these changes in land use.

Many would consider the City's update to the Heritage Conservation Program approved by Council in 2020 to be more progressive because it makes strides towards truth and reconciliation, cultural redress, and starts to recognize a diversity of values and intangible heritage. But one of the most challenging and important parts of the planning model (called Historic Urban Landscape) adopted as part of the Heritage Conservation Program is democratic processes in participation and holding dialogue about what is important to keep, what to let go, and when letting go, what to put in its place. One of the progressive intentions of that planning model was for it to be used in community planning to help people through change. We hope that this part of the planning model for the City's Heritage Conservation Program can be put into action especially in these cases where we need to allow for change in order to provide housing that addresses the various forms of housing vulnerabilities people face.

Sincerely,

Bill Yuen

A handwritten signature in black ink, appearing to read 'Bill Yuen', written in a cursive style.

Executive Director
Heritage Vancouver Society