

April 19, 2010  
Martin Bruckner  
IBI/HB Architects  
700 – 1285 West Pender Street  
Vancouver, BC V6E 4B1

Dear Mr. Bruckner:  
RE: 1600 Beach Avenue (Beach Towers)

Thank you for your rezoning inquiry for the above property which we received February 23, 2010. You inquired about rezoning the Beach Towers property from RM-5A to CD-1 under the Short Term Incentives for Rental (STIR) Program to permit construction of a fourth residential tower at the corner of Cardero and Harwood streets, and townhouses at grade along Beach Avenue with a café at the corner of Beach and Bidwell Street.

This site was originally developed in the 1960s with three residential towers at 19 and 20 storeys, or 176 to 180 feet. The existing density is 3.39 FSR which is legally non-conforming to the RM-5A maximum of 2.20 FSR. You propose to retain the 447 rental units in the three existing towers and indicate that the tenants would not be displaced by the proposed construction. The proposed fourth tower would add 165 rental units, plus another 25 rental units in the proposed townhouses. Three options for the tower were shown in the inquiry ranging from 15 storeys to 22-storeys (199 feet). Density would increase from 3.39 to 4.88 FSR in all three options.

STIR Program

Under the STIR Program, rezonings to higher density and/or height can be considered where new rental units are built and secured through a long-term housing agreement, provided existing tenants are not displaced by the development. In considering such proposals, Planning staff review the policies, guidelines and regulations that apply to the site and its context. In the approval of the STIR Program in June 2009, it was specifically noted that the program does not suggest that the City's interest in achieving rental construction overrides prevailing policy or guidelines, or reasonable urban design considerations.

#### RM-5A Tower Separation Guideline

After reviewing the RM-5A Guidelines with regard to your submission, we note that your proposed tower does not meet the specifics or the general intent of the guideline for tower separation [4.3(a) on page 8]. This guideline calls for 400 feet (121.9 m) of spacing between towers that are within the same block-face and over 110 feet (33.6 m) in height. The intent of the separation guidelines is to maintain a diversity of building heights across the West End residential districts. High towers are to be located to create a skyline with an evident pattern and sited where they maintain or create view opportunities between existing buildings. The intention is to avoid filling gaps, creating a continuous wall of towers blocking views and resulting in a wall like appearance. Due to the length of blocks in the West End, the 400-foot separation requirement effectively means that most block-faces can only have one tower over 110 feet in height.

The guidelines do allow for consideration of less separation distance if heritage objectives are met or if a high tower form better serves urban design considerations and neighbourliness compared to an envelope building or lower tower allowable under the zoning. In three of the five towers

approved in the West End RM districts since the guidelines were adopted, decreases in the separation distance were allowed for such reasons (from 400 feet to 105, 160 and 185 feet).  
Beach Tower Proposal

Your submission indicates 78 feet between the new tower and the existing tower to the west along the Harwood block-face. The two existing Beach Towers in the Harwood block-face also do not meet the tower separation guideline, but of course they were built prior to the guidelines being adopted in 1989. Nonetheless, given that the block-face already has two towers, and given the proximity of the third existing tower to the proposed fourth tower, the resulting ensemble does not meet the intent of the separation guidelines as stated above. The view analysis you included with your inquiry focuses on the micro view impacts from immediate neighbours. We feel that the view opportunities mentioned in the guidelines relate more to the macro experience of views toward English Bay from existing upland towers that are less immediate to the site. We conclude It is difficult to argue that a wall like appearance would not result from the addition of a fourth tower.

Also, in considering whether your fourth tower merits a decrease in the tower separation, we looked at what the STIR Program indicates. The STIR Program does allow consideration of infill buildings on properties with existing rental housing, but the program's report from June 2009 specifically states that STIR (and the City's interest in rental housing) do not, by themselves, lend weight to requests for relaxation of building separation. Such requests for relaxation continue to be guided by the zoning guidelines. The report does suggest that building separation may be subject of longer-term comprehensive planning updates. Council has since asked staff to report on the timing of a planning program for the West End, but it will be some time before it is known whether a review of the tower separation guidelines will be part of that work.

With respect to the infilling of the Beach Avenue frontage, as well as the Harwood Street frontage, with townhouses or other 2- to 3-storey form, we see considerable merit in pursuing this idea.

In conclusion, we cannot support a fourth tower at 1600 Beach, as the 400-foot tower separation intent cannot be achieved on this site. If you wish to consider a notably lower building form at the Harwood/Cardero corner that relates to the scale of neighbouring buildings at the intersection, then we would be pleased to review that in another inquiry submission.

Yours truly,

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