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October 21, 2008

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

Mayor Sullivan and Vancouver City Council;

**Re: Lane Way Housing**

On behalf of Heritage Vancouver, we are submitting the following comments regarding the adoption of Lane Way Housing ('LWH'). While we are supportive of this initiative, and its objectives to provide a sustainable approach to densification of existing single-family neighbourhoods, we share the concerns of the Vancouver Heritage Commission that there must be cautious limits on how LWH is implemented.

LWH has the potential to act as an incentive to retain existing housing stock, including both heritage and character buildings. We believe that LWH should be included as an option in heritage negotiations and strongly emphasize the ability to rezone to strata LWH in through the HRA. This would go along ways to ensure this additional density is "earned" and protects heritage buildings.

We are concerned about the impact this initiative could have on our existing neighbourhoods, which have matured over time and represent the overall long-term historic development of Vancouver. This includes the buildings already identified as heritage, but that is only a small portion of the houses that define the character of these neighbourhoods. Other, well-built, non-heritage buildings add to the ambience, as do mature plantings and landscaping. These neighbourhoods are a collection of the total scope of growth, development and maturity over time. This LWH initiative must be managed to ensure that heritage buildings and neighbourhood character are maintained. Careful infill would achieve this while at the same time increasing livability, affordability and sustainability over time.

We therefore support the position of the Vancouver Heritage Commission, and reinforce the following points, that LWH should:

1. Be permitted only for existing single-family houses. LWH should only be used as an incentive to retain existing housing, and not provide an incentive to demolish and rebuild. There may need to be an additional distinction between newer houses that are already built to the maximum allowable density and older houses that are under built.
2. Be only non-strata family or rental, unless allowed as strata as part of a heritage negotiation. The provision of more non-strata family housing and rental options will greatly enhance the City's stock of affordable housing.

3. Be restricted to the footprint of what would be available to a garage. Any additional density should be earned only through heritage retention, otherwise the options for heritage negotiation and retention will be undermined.
4. Not require upgrading the existing single-family house or create undue hardship on existing homeowners. This will also help avoid the problematic building envelope upgrading that is destroying the character of many early homes. Requirements for extensive upgrading could simply trigger demolition.
5. Count against the maximum FSR allowed for the property if the existing house is later demolished, eliminating a loophole that would allow a larger structure to be built in the future.
6. Be tested and implemented in a controlled fashion in order to assess and correct any negative impacts on current programs. Conditional measures will have to be included in the zoning. A detailed analysis of potential economic impacts should be undertaken so that there is a clear understanding of how this will affect land value and whether this initiative will have unintended consequences that will ultimately encourage wholesale demolition and rebuilding.

We also strongly support the LWH Prototypes as outlined by the Commission.

*The National Standards and Guidelines for the Conservation of Historic Places in Canada* include principles on how to integrate the design features of free-standing contemporary additions with the exteriors of existing heritage structures. These principles are best practice for heritage planning and should be included in the design language of LWH prototypes. Their inclusion would help to visually respect the immediate heritage context of relevant sites and help to maintain the integrity of the existing character of neighbourhoods

Heritage Vancouver supports the cautious implementation of Lane Way Housing as long as these above-noted conditions can be incorporated into the LWH policy.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "don luxton", with a stylized flourish at the end.

Donald Luxton, President, Heritage Vancouver

Cc.

Richard Keate, Vancouver Heritage Commission  
Brent Toderian, Director, Planning  
Ronda Howard, Assistant Director, Citywide and Regional Planning  
Marco D'Agostini, Senior Heritage Planner  
Thor Kuhlmann, Planner, Citywide and Regional Planning