



Heritage Vancouver

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January 4, 2016

Mayor Gregor Robertson and Vancouver City Council
Vancouver City Hall
453 W. 12th Ave.
Vancouver, BC, V5Y 1V4

Re: 105 Keefer Street and 544 Columbia Street

Dear Mayor Robertson and Members of Council,

We are writing to express our concern for the proposed development at 105 Keefer. As you are aware, the proximity of the site to the Memorial Square, Dr. Sun Yat Sen Garden and the museum makes it a highly historically and commemoratively sensitive area and the Chinatown Historic Area Planning Committee (CHAPC) has found that the proposal does not fully recognize this sensitivity.

With regards to building form, CHAPC noted “overwhelming concern of the scale of the development at a height of 120’, and concern that the FSR is excessive for this site”. We concur with this assessment; the massing of the proposed building is very heavy and the height of the building is not in context with the surrounding buildings.

Building form is but one aspect of this tremendously significant historic and cultural area. The Chinatown Neighbourhood Plan identifies many other characteristics: the importance of strengthening the cultural and historic fabric, neighbourhood character, a diverse housing mix recognizing the importance of affordability and an aging population, an authentic experience of Chinatown’s culture and heritage through urban life, community and cultural activities, and inter-generational programming. Any development on this site should richly align with this recognition of the need for fusion of culture and place in the form of, and amount of, community and cultural space, appropriacy of residential units for the tangible and intangible character of the neighbourhood, and a better mix of uses for the proposed development of the site. Indeed, these community values are integral to the fulfillment of the Chinatown Neighbourhood plan, to the recognition of Chinatown as a National Historic Site of Canada, and the city’s pursuit of Chinatown for UNESCO World Heritage Site designation (although this site is not in the HA-1 area, its immediate adjacency to the HA-1 area makes it impossible to view it as independent from the lived experiences and cultural attachments and expressions present in those who visit and inhabit the area).

Also of important note is that in the June 1, 2015 Administrative Report ([RTS No. 10654](#)) to Vancouver City Council from the General Manager of Planning and Development Services on the Heritage Action Plan Update, a description is given of the evolution of heritage conservation from the materials based approach relying on architectural style to a more internationally recognized holistic approach:

The approach to identifying heritage resources changed significantly in the early 2000s through a national effort known as the Historic Places Initiative (HPI) which also created a National Heritage Register. This work recognized international best practices by adopting a community values based approach encompassing historical, cultural, aesthetic, scientific, and educational values. In addition, the initiative noted that many community values have intangible qualities and significance, such as community traditions or spiritual values, and it asserted that those also need to be identified and evaluated. These values manifest themselves into themes which help to describe a society's collective cultural history and assist in identifying key heritage features. This approach as outlined in the national HPI initiative is being utilized in the review of the Heritage Program and Upgrading of the Heritage Register which is now underway.

In addition to being one of the largest Chinatowns in North America, Vancouver Chinatown is an area of tremendously significant social, cultural and historical importance for our city, with intact physical as well as *social* character defining elements- there exists in the area socially intact groups and a large community tied to the area that gives Chinatown its uniqueness and richness in character. Being in this particular corner of such an area should carry with it an extremely high bar for alignment with objectives agreed upon between the city and the community as evidenced by the backing of community groups for the Historic Area Height Review. This sentiment is well documented; one example would be a section on page six of the Chinatown Neighbourhood Plan that reads:

To remain economically competitive, it must do so without losing its culture and heritage – assets that define its identity and set it apart from other neighbourhoods.

Consequently, there is an onus to demonstrate that development on this site prevents Chinatown from losing its culture and heritage, defines its identity and clearly sets it apart from developments in other neighbourhoods. Importantly, this should apply to beyond architecture; merely adding more “Chinatown-like” features such as more brick and slimmer balconies with Chinese screens is insufficient. The proposal, including the widening of the plaza and inclusion of the 25 units of senior housing, although an improvement on the original proposal of zero units, does not seem to optimize the potential of what can be done on this significant site and respect the spirit of the neighbourhood plan and the wishes of the community groups in the area.

We believe that this site provides exceptional opportunity for the city to show leadership and implement land use planning that integrates the culture with the physical place as referenced in planning documents for the area, current best

practices in heritage conservation, and the recommendations of the Heritage Action Plan. As is proposed, we do not find the project at 105 Keefer to be supportable.

Sincerely,

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

Bill Yuen
Manager, Heritage Vancouver Society