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December 7, 2004

Gerry McGeough, Senior Planner  
Heritage Group  
Community Services  
City of Vancouver  
453 W. 12<sup>th</sup> Avenue  
Vancouver, BC V5Y 1V4

Dear Mr. McGeough,

**Re: Woodward's Redevelopment – Westbank Proposal**

As you are aware, Heritage Vancouver is on record (letter of September 1, 2004 enclosed) as having favoured the Concert /Holborn proposal as being the option most respectful to the heritage value of this designated landmark, and most sensitive to its historic neighbourhood context in Victory Square, Gastown and the Downtown Eastside. In our letter, we set out fundamental principles to be considered:

- Woodward's is a *designated* heritage site. As such, we would expect that the highest standard of conservation would be applied. As this pivotal City/private collaboration will set the bar for future heritage conservation, it is crucial that Woodward's proposals meet or exceed conservation standards expected for other developments.
- Woodward's is a pivotal building that anchors the historic core of the City, and presently complements its scale and character. That historic character is extremely fragile. Special attention must be paid to the impact of redevelopment on adjacent buildings and streetscapes.
- Woodward's is located within the Victory Square planning area. The Victory Square Concept Plan (April 1998) sets a policy of heritage retention, with new infill development to reflect the typical low/mid rise streetwall. The Plan does not support *point tower* forms that would compete for prominence with heritage landmarks such as the Dominion Building and Sun Tower, and the Plan generally does not support heights over 70' (south side of street), and 100' (north side).

The three major heritage/ urban design issues to be addressed on this site are:

- Scale of development
- Level of heritage conservation, and
- Impact on neighbourhood context

**Scale of Development:**

We believe the addition of a significant new *point-tower* element will be a major and inappropriate intrusion into this neighbourhood, particularly at the scale proposed in the

current Westbank proposal. The proposed tower will dominate the neighbourhood, will compromise the prominence of nearby historic towers, and will eclipse the Woodward's 'W' as the new *de facto* landmark. In addition, we believe that the scale approved on this site will set a dangerous precedent for future developments, opening the door for aggressive rezoning proposals exceeding height and density limits prescribed for Gastown and Victory Square.

We strongly urge City staff to work with Westbank to significantly reduce the height of the proposed tower. A squatter 'slab' form would be more in keeping with traditional massing, and would allow comparable density in a lower structure. The applicants should also consider shifting density to other portions of the site, as well as transferring some density off site entirely.

### **Heritage Conservation and Neighbourhood Context**

Apart from the token retention of the 1903/08 building, the current Westbank proposal falls far short of an acceptable conservation standard for this designated site. A more acceptable level of conservation is demonstrated in the Concert/Holborn proposal, where all existing building elevations are retained to a depth of three structural bays, with full restoration of original architectural detail and fenestration. The retention of structural depth is crucial to help maintain visual integrity and avoid the pastiche effect of *façadism*.

Woodward's most 'public' face is its south elevation along Hastings St. This frontage, surmounted by the 'W', has iconic status and should not be treated lightly. Significant removal of the original street-facing fabric would seriously erode the continuity of the Victory Square/Hastings Street corridor, which has recently been recognized as a significant intact historic precinct eligible for enhanced heritage incentives.

Unfortunately, the current Westbank proposal exhibits an almost wanton disregard for the Hastings elevation and its context. On the justification of 'opening up' the building and courtyards to the public, the applicant proposes to cut gaping and unnecessary swaths the full height of the Hastings Street elevation. Viewing the scale model, it appears that what remains of the Hastings frontage is reduced to a token *façade* – a deliberately 'deconstructed' pastiche stuck onto a new building. The level of intervention is such that it is difficult to determine whether the remaining *façade* is original or an applied design rendered in new materials. This invasive and destructive approach would not be considered for designated heritage sites anywhere else in the city. Our concerns are echoed by GHAPC whose resolution to Council also calls for a higher standard of heritage conservation.

We very much wish to be able to support this project, which will bring so many benefits to this troubled part of the Downtown and Downtown Eastside Community. But the Westbank design, in its current form, fails to adequately address the key issues of scale, context and heritage conservation. We urge the City and the applicants to address these issues in the detailed design process.

Sincerely,

Donald Luxton, President

c.c. Larry Beasley, Director of Current Planning  
Richard Keate, Chair, Vancouver Heritage Commission  
Christine Tapp, Central Area