September 22, 2008

Mayor Sullivan and City Councillors City of Vancouver 453 West 12 Avenue Vancouver, B.C. V5Y 1V4

Dear Mayor and Councillors:

Re: Heritage Density Bank Review

Neighbourhoods for a Sustainable Vancouver is a city wide ad hoc organization of neighbourhood groups that includes residents' associations, CityPlan Vision implementation committees, ratepayers' associations and community groups. We understand that the City is undertaking a review of the Heritage Density Bank which includes the Heritage Building Rehabilitation (HBRP) and the Transfer of Density Program (TDP). These programs have the potential to impact the entire city, especially considering the policies recently approved under EcoDensity. We are concerned that to date the public has not been given adequate notification of this review and the neighbourhoods have not been included in the consultation as stakeholders.

In principle we support the City providing incentive programs for the rehabilitation of heritage buildings and preservation of heritage and character streetscapes. Our concern is that the temporary 2003 incentive programs in the heritage districts have flooded the Heritage Density Bank. The 160,000 sq. ft. in 2005 went to 1.5 million sq. ft. in 2006, followed by the freeze to the program in 2007. Based on the Altus Report presently posted on the City's website, there is 1.6 million sq. ft. of untransferred density that has now accumulated. Already unsustainable, this approach is now proposed to be reactivated without considering all the broader implications or consulting with the neighbourhoods that could be affected. As part of the temporary incentive program, the outright zoning in the heritage districts that allows 7 stories outright in an area that is mostly 2-4 stories is excessive. These unearned density bonuses increase pressure on demolition of the heritage buildings and at the same time unreasonably increase the density in the bank. The temporary heritage incentive programs in the Heritage Districts need to be restructured with the temporary outright allowable height and density reduced to be more sustainable.

Given the density already in the bank and the additional amounts that would be added were the program to be reactivate as proposed, we understand that the City is considering change of policy to increase areas for transfer of density landing sites. We adamantly oppose allowing landing sites for heritage density transfers from the downtown Heritage Density Bank to be expanded into the neighbourhoods across the city. This would override our Community Visions while eliminating opportunities for our own local heritage projects and bring in unsupported excessive density. The character of each of Vancouver's collection of twenty-three neighborhood villages must be respected and not used as a dumping ground for density from another area.

Considering EcoDensity was passed by Council with only 23% of letters for support and 77% of nonsupport or requesting changes, it does not represent a mandate to use this EcoDensity policy to transfer unsupported density from downtown into the neighbourhoods. The neighborhoods should be active participants as stakeholders in the Heritage Density Bank Review process and to date that has not happened. It is completely wrong to be proceeding to bring this to Council for approval when the pubic has not been notified and included in this review process.

Please consider our comments and we look forward to being actively included in the consultation processes to create a more sustainable plan for heritage areas.

Regards,

Neighbourhoods for a Sustainable Vancouver

Group contact email: <u>agroupofvancouverneighbourhoods@hotmail.com</u> Supporting Group names:

- Advocates for Hastings Sunrise
- Arbutus Ridge Concerned Citizens Association
- Arbutus Ridge/Kerrisdale/Shaughnessy CityPlan Vision Implementation Committee
- Britannia Neighbours in Action
- Building Better Neighbourhoods
- Citywide Housing Coalition
- Douglas Park Residents Association
- Dunbar Residents' Association
- East Fraser Lands Committee Sharon Saunders **
- Friends of Southlands Society
- Grandview Woodland Area Council
- Hastings Sunrise CityPlan Vision Implementation Committee
- Kensington Cedar Cottage CityPlan Vision Implementation Committee
- Kitsilano Arbutus Residents' Association
- Kitsilano Point Residents' Association
- Marpole Oakridge Area Council Society
- Norquay Neighbours Joseph Jones **
- North West Point Grey Home Owners' Association
- Reinstate Third Party Appeals
- Riley Park / South Cambie CityPlan Vision Implementation Committee
- Shaughnessy Heights Property Owners Association
- South Hill Initiative for Neighbourhood Engagement (SHINE)
- Southwest Marine Drive Ratepayers' Association
- Upper Kitsilano Residents Association
- Victoria Fraserview Killarney CityPlan Committee Andrea Rolls **
- Victoria Park Group Gail Mountain **
- West Kitsilano Residents Association
- West Point Grey CityPlan Vision Community Liaison Group
- * Some members of the group indicate support for the letter, but have not voted on it yet due to timelines.

** Signed as an individual member

Cc: Brent Toderian, Director of Planning

Ronda Howard, Assistant Director of Planning – City-Wide and Regional Planning

Kent Munro, Assistant Director of Planning – Community Planning Division

Rob Jenkins, Assistant Director, Current Planning Initiatives Branch

Thor Kuhlmann, Planner, City-Wide Regional Planning

Cameron Gray, Director of Housing

Marco D'Agostini, Senior Heritage Planner

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