

Vancouver Character House Network

June 5, 2014

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

Dear Mayor Robertson and Councillors,

Re: Heritage Action Plan - Council Meeting June 10

The Vancouver Character House Network thank you for this report. Although it is a step in the right direction, we have a number of concerns.

Generally, since the public has not been consulted on the proposed provisions prior to the report being presented for council approval, we would appreciate the issues raised below be considered for amendment of the report. We also request that the public, and particularly affected communities, be included in the monitoring of the interim provisions and have input in a collaborative process into creating the zoning changes being contemplated.

Further, we have concerns about the implementation of heritage density bonusing in RS and RT zones at the discretion of the Director of Planning without a public hearing or community input. This is discussed in more detail below.

There is nothing in the report dealing with the building code that is biased towards new construction. For instance, rain-screening the existing exterior walls of the character houses should not be required. Also, when a house is moved it should not be required to be brought up to full current code compliance. Often the upgrades alter the very character that make a house worth saving. Heritage building owners should not be forced into upgrades that increase the financial burden of maintaining a building. Relaxing the building code for pre-1940s homes will encourage retention and keep more affordable, liveable homes out the landfill.

Specific concerns are as follows:

[Heritage Action Plan: Steps to Enhance Protection of First Shaughnessy and Pre-1940s Character Houses](#)

Appendix C -

POTENTIAL HERITAGE OR CHARACTER BUILDINGS REVIEW – Interim Procedure - DRAFT

1. The city use "pre-1940" as the cut-off date rather than "pre-1940's". It would not include any buildings after 1940. Many areas of the city were built in the 1940's and these are houses that should indeed be considered character and covered by this criteria.

Recommendation: Replace "pre-1940" with "pre-1940's" where ever it appears in the document.

2. Appendix C - page 2 of 2 states regarding RS3 and RS5:

Innovative proposals for retention which might include extra density or other relaxations that involve discretion in applying guidelines, policies and regulations may be considered. Staff are encouraged to consider alternative approaches that avoid the loss of potential heritage/character buildings wherever possible. This could include additional floor area in the existing building and/or laneway house, additional dwelling units, and relaxation of other regulations that would encourage retention.

It is unclear what the limits to these variances might be, if they are just at the discretion of the Director of Planning or if the public has input to this process. It is important that checks and balances are in place rather than this kind of open ended policy which is vulnerable for abuse. Any relaxations should be economically neutral; there needs to be a process to determine that it is within reason.

Recommendation: Relaxations in RS3 and RS5 zones should not be unlimited and should require support from adjacent affected property owners.

3. Appendix C - page 2 of 2 states regarding RS3 and RS5 also says:

*Where buildings do not have character merit, the building may be demolished and the conditional aspects of the development application may be considered. **There may be some limited circumstances when the demolition of a character merit building will be considered by the Director of Planning. For example, if a property is underutilized (a small building on a large site) which could result in large additions that would impact the character value of the original building; or if the building is structurally unsound (confirmed by a registered structural engineer).***

Since most character buildings are below allowed maximum FSR, this clause that allows demolition of character merit buildings could apply to a majority of these houses.

Recommendation: Delete property underutilization as a reason to allow demolition of a character merit building in RS3 and RS5 zones. Provide other incentives to make it economically neutral for retention.

4. The vast majority of RS zoning is RS1 at 77% across the city. RS1 doesn't have conditional provisions so under this proposal the city will not be able to refuse an application on that basis.

Appendix D - HERITAGE PROFORMA REVIEW – Interim policy - DRAFT

5. Appendix D - page 2 of 3 - states:

Variances of dwelling unit density and parking/ loading relaxations, as well as heights and yards and similar provisions, are not included in the limitations noted above. The Director of Planning may support and/ or grant these variances and/ or relaxations provided the Director of Planning concludes that these variances or relaxations are supportable with respect to view and privacy impact, shadowing, and livability.

There are no clear limits to proposed relaxations; or how it will be determined whether these relaxations are reasonable compensation to ensure that it is economically neutral for the retention option; or if the relaxations are in fact supportable by those affected adjacent property owners.

Recommendation: Ensure that relaxations are limited, reasonable and supported by the affected adjacent property owners.

6. Appendix D - page 3 of 3 - has two tables showing how a 10% density bonus under the discretion of the Director of Planning for retaining a character merit building would result in increased FSR for all RS and RT zones.

RT 3, RT7 and RT8 already have conditional aspects to their zoning as incentives for character house retention. They should not be included in this further density bonus incentive proposal.

Recommendation: Delete RT3, RT7 and RT8 from the additional 10% density bonus incentive.

There has been no public discussion of this provision for the other RS and RT zones and it is unclear at this time whether this is supported for these areas either.

Recommendation: Consult with public as to if additional 10% density bonus incentive is necessary for the other RS and RT zones.

7. There still is mention of RT10 and RT11 in the report. These are not retention-based zoning. They were designed for the neighbourhood rezonings of Knight and Kingsway, and for Norquay. They would destroy any remaining character in the city with further incentives to demolish character buildings if implemented in RS zones and should not even be considered as part of this process.

Recommendation: Delete references to RT10 and RT11 in regard to potential zoning changes to RS zones.

8. The city is considering strata in RS zones. Strata should be kept only for heritage projects that are registered on title under an HRA. Otherwise we will lose the non-strata rentals that are a priority for affordable housing policy. Further, if strata is allowed for new development as well, this would put more pressure on demolitions, not less.

Recommendation: Do not allow strata in RS zones other than for HRAs to protect non-strata rentals.

Heritage Action Plan: Encouraging Reuse and Recycling of Construction Waste from Pre-1940 Homes and Construction and Demolition Waste Diversion Strategy

Deconstruction is not a means of heritage protection; it is the opposite.

9. Report page 4 states:

Wood is the predominant material in single family homes in Vancouver and a 2200 ft² house can contain approximately 100 tons of materials of which more than 50 tonnes is wood (structural framing, flooring, and siding). By using deconstruction techniques, wood and other materials can be separated, sorted, and can be more easily reused and recycled. For example, if 80% of wood from a typical pre-1940's one/two family home is captured for reuse or recycling, an additional 40 tonnes of waste could be diverted from landfill per demolished home.

The best way to recycle the 100 tons of materials in the average 2200 ft² character house is through reuse of the building rather than just recycling of materials.

Recommendation: Reuse of character buildings on site should be the priority, not deconstruction.

Recommendation: The city should not allow demolition (deconstruction) permits to be issued prior to the issuance of development and building permits.

10. The city should make it easier to relocate a whole intact house to another lot by improving the building code to relax upgrade requirements. Currently, moving a building requires a full code upgrade compliance of the building and that is too onerous for an older character house and will destroy its character defining features. Also, the city should make it financially viable for house moving costs of infrastructure to facilitate the move.

Recommendation: Make it cost effective to move a whole intact character house by amending the building codes and by reducing city moving costs.

Vancouver Heritage Register Annual Update

11. The efforts to save character houses in RS zones do not need to be held back until after the Heritage Register Update is complete.

Recommendation: The review of the RS zones (and some RT?) to improve character house retention should be undertaken immediately in a collaborative process with the affected communities.

12. The Legg House should be removed from the register as a Heritage A building as it has been approved for demolition and will be gone by this weekend.

Recommendation: Remove Legg House - Heritage A from Heritage Register as demolished.

13. Any historic places added to the inventory should be shown separately from buildings as is the practice with Landscape Resources.

Recommendation: Show historic places separately from buildings on Heritage Register.

Thank you for the report, which is a step in the right direction. We request that you amend the report to reflect the concerns raised here. In future we would appreciate being fully involved, along with the public, in the implementation of the Heritage Action Plan, including all stages well in advance of decision making on an incremental process through completion.

Sincerely,

The Character House Network

Agenda: <http://former.vancouver.ca/ctyclerk/cclerk/20140610/regu20140610ag.htm>

1. Heritage Action Plan

Brian Jackson, General Manager of Planning and Development Services, and Hugo Haley, Senior Sustainability Specialist, to present on the following three reports:

- (a) [Heritage Action Plan: Steps to Enhance Protection of First Shaughnessy and Pre-1940s Character Houses](#) 
- (b) [Heritage Action Plan: Encouraging Reuse and Recycling of Construction Waste from Pre-1940 Homes and Construction and Demolition Waste Diversion Strategy](#) 
- (c) [Vancouver Heritage Register Annual Update](#) 