

November 23, 2020

Dear Vancouver Heritage Commission Members,

**Re: Office Tower Proposal at 555 West Cordova Street**

We, the Downtown Waterfront Working Group, are a group of volunteer, non-partisan planners, architects and urbanists dedicated to creating a spectacular and functional Downtown Waterfront and transportation hub. Many of us are former City of Vancouver planners.

We are seeking your support to put carefully crafted plans before individual building projects and recommend against this proposal. City staff are currently working on an updated Waterfront Plan. Why put projects before plans, especially on such a special site, and also ignore current planning and urban design directions?

**Regulatory and Planning Context**

This proposal is a development permit application and not a rezoning. There is no “outright” zoning attached to the site but instead it is a conditional form of zoning, based on compatibility with design guidelines and other policies of Council.

Gil Kelley, Director of Planning, in a letter to our group dated July 18, 2020 stated that the Development Permit Application “will be evaluated against all applicable regulations and policies, with input from advisory panels and public engagement, before consideration by the Development Permit Board.”

Your heritage impact evaluation as Commission members will assist the Development Permit Board in their review of the office tower development application. Unfortunately, the City has not yet shared its evaluation framework with you or the public, making your task much more difficult. The only information provided at the Open House in February 2020 and in the Virtual Open House currently in progress on the City site was from Cadillac Fairview.

Our group, has carried out a planning evaluation and has concluded that proposed development is in conflict with the following:

1. The Downtown Official Development Plan/Design Guidelines (intent and performance measures to earn height and zoning rights)
2. The Standards and Guidelines for the Preservation of Historic Places, Parks Canada
3. City of Vancouver Central Waterfront Hub Framework

1.) The **performance evaluation tools of bulk and height** in relation to the immediate area are included in the Downtown Design Guidelines. Bulk and height in such proximity to the historic buildings is jarring. There are good examples in Vancouver and around the world where large,

modern buildings complement historic buildings. This is often done by setting new buildings back and well away from the historic buildings.

One of the objectives of the Downtown Design Guidelines is to preserve as much of the historic townscape of the City as possible. The Waterfront Station and The Landing Building at the doorstep to Gastown form one of the few historic townscapes in the City.

2.) Canadian principles governing the treatment of heritage resources are found in ***Parks Canada's Standards and Guidelines for the Preservation of Historic Places***. Any new construction should be a) physically and visually compatible with, b) subordinate to and c) distinguishable from the historic place. The insertion of an oversized steel and glass building wedged in beside the Waterfront Station massively dominates the Station building as well as the neighbouring Landing Building and accordingly is neither visually compatible or subordinate to the heritage buildings.

It is distinguishable from the historic place/buildings but in a very unsympathetic manner. As described in the applicant's Heritage Impact Assessment, the proposed tower leans towards distinguishability in "built form/height/scale/outline" as well as in "material/colour". Such distinguishability could be justified in the heart of the City's financial district but in the heritage townscape context of this site, the scale must tip toward compatibility.

3.) **The Central Waterfront Hub Framework** is Council's existing policy to guide development within the Waterfront area, including this site. This development ignores heritage polices, specific siting recommendations on scale and height of buildings, and phasing recommendations.

An additional key Council policy which applies to this site is the **Metro Core and Economy Land Use Plan**. Its purpose is to ensure an adequate supply of floorspace for future job growth, especially near transit. However, this policy states specifically that the direction for office space lies within the Central Waterfront Hub:

*Council has recently approved the Central Waterfront Hub Study ("Hub Study") to create a detailed urban design and structure plan for the portion of the area between approximately Howe and Cambie street ends. (Metro Core Jobs & Economy Land Use Plan: Issues & Directions Appendix A: page 21, dated July 7, 2007)*

The goal of increasing job growth in the Metro Core is framed in the context of enhancing the public realm and supporting amenities to ensure the Downtown remains an attractive place to work and visit. Compliance with this goal does not mean that every office development needs to be approved. Current estimates indicate at least a 10 year's supply of office space in the pipeline or already approved.

The attached Table outlines specific policies and links to documents.

## **Win- Win Solutions are Possible**

Cadillac Fairview believes it can go ahead and build without interfering with the rest of the Waterfront Plan. We disagree for a number of reasons: the oversized building could interfere with transit expansion; an updated site plan has not yet been prepared for the Waterfront; a public realm study may identify this site as the best location for a public plaza at the entrance of Gastown not compromised by a towering, bulky structure; equitable costing of infrastructure and public benefits has not been worked out; the Granville Street extension to the waterfront (owned by Cadillac Fairview) has not been solved, to name a few obstacles.

Thankfully, time is on the City's and Cadillac Fairview's side. The proposed site is a parking lot and has been since 1914. Cadillac Fairview has no holding costs or extra property tax burden because the BC Assessment Authority does not assume development potential for the parking lot under the current zoning.

Cadillac Fairview has the professional capacity and expertise to collaborate on what would be Canada's most exciting waterfront project.

Development of the City's Waterfront plans and accompanying public engagement may well show that the best possible solution for this century-old parking lot in the centre of an historic precinct is the creation of a beautiful plaza at the entrance of Gastown, framed by the Waterfront Station and the Landing Buildings. If that is the decision, the floorspace potential from this site, including the floorspace attributable to Waterfront Station, can be transferred to another site in the Downtown or elsewhere in the Waterfront Planning Area.

If you have any questions, please contact me at [cdemarco@telus.net](mailto:cdemarco@telus.net)

Yours sincerely,



### **Christina DeMarco on behalf of Downtown Waterfront Working Group:**

Tom Phipps, former City of Vancouver planner  
Mary Pynenburg, former Director of Planning, New Westminster  
Michael Alexander, Urbanist, and convenor of SFU City Conversations  
Charles Dobson, Professor Emeritus, Emily Carr University  
Frank Ducote, former City of Vancouver urban designer  
Gordon Price, former City of Vancouver councillor  
Richard Johnson, former City of Vancouver planner  
Christina DeMarco, former City of Vancouver planner  
Ray Spaxman, former Director of Planning, City of Vancouver  
Anthony Norfolk, former member of Heritage Commission

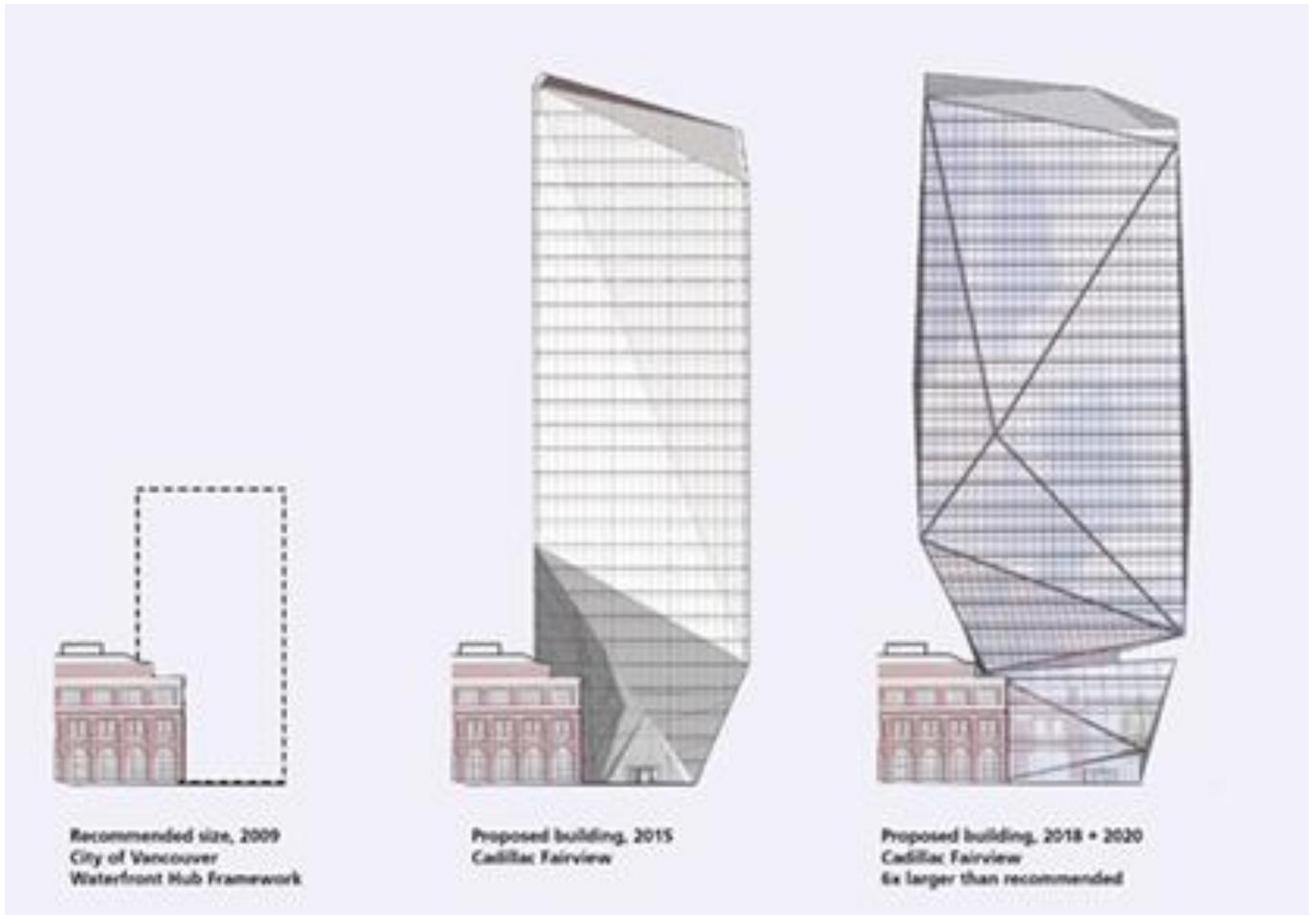
## Assessment of Compatibility with Existing Regulations and Policy

Policy	Comments	Assessment
<p><b>1.City Decision in 2017 to update Central Waterfront Plan and expand study area</b></p>	<p>Review in progress. City Council approved a work program to complete an updated plan for an expanded Central Waterfront area. There are a number of complex issues involving TransLink's future transit station and interchange plans, Port interests and future of the rail yards, etc. City staff are making progress but not expected to have recommendations until 2021 or 2022.</p>	<p><b>Does not conform- City staff asked all landowners to withhold development proposals until the updated Plan is completed</b></p>
<p><b>2.Existing zoning provisions in Downtown Official Development Plan</b></p>	<p>Zoning is discretionary, there are no outright height and density provisions- approvals of height and density are based on performance criteria in ODP, Design Guidelines and Council Policy.</p>	<p><b>Complies with permitted land uses (office)</b></p> <p><b>Does not meet performance measures to earn requested height and density</b></p>
<p><b>3.Heritage provisions in the Downtown Design Guidelines</b></p>	<p>6.2.2 3(c)The size of the site will have an important bearing on the height, bulk and density that can be attained by any particular development. Any proposed development should consider thoroughly the relationship of the building size to the site area, configuration and surrounding physical environment: <i>Proposed building appears crammed up against the Waterfront Station; Impossible to shoehorn such a large building on a small site.</i></p>	<p><b>Does not conform</b></p>
<p><b>4. Parks Canada Heritage Standards and Guidelines</b></p>	<p>Any new construction should be:</p> <ul style="list-style-type: none"> <li>a) <b>physically and visually compatible:</b> <i>not compatible, hovers over and detracts from the Station building, massively dominates Station Building and the Landing</i></li> <li>b) <b>subordinate to:</b> <i>not subordinate due to height, bulk, and materials</i></li> <li>c) <b>distinguishable from the historic place:</b> <i>distinguishable in a very unsympathetic manner</i></li> </ul>	<p><b>Does not conform</b></p>
<p><b>5.Heritage policies in the Central Waterfront Hub Framework</b></p>	<p>5.2.2 Taller buildings should be sufficiently set back from the Waterfront Station building to preserve its setting and prominence.</p>	<p><b>Does not conform</b></p>

	<i>Rather than being set back, the proposed building hovers over and crowds out the Station building</i>	
<b>6. Illustrated Concept Plan in Central Waterfront Hub Framework</b>	5.2.2 Heritage Preservation and Enhancement: The siting and design of new buildings within the Framework area should be carefully considered to ensure that the setting of the heritage buildings is preserved and wherever possible, enhanced: <i>To respect this policy, concept plan shows a possible building size of 6,100m2 and 11 storeys. Proposed building is almost 6 times larger at 35, 586 m2 and 26 storeys</i>	<b>Does not conform</b>
<b>7. Staging policies in the Central Waterfront Hub Framework</b>	The phasing of development within the Framework area should ensure that the transit interchange is delivered concurrently with new development, no development should occur until street network is finalized and costed, or before the development of a Public Benefit Strategy: <i>None of this work has been completed</i>	<b>Does not conform</b>
<b>8. Metro Core and Economy Land Use Plan Policies</b>	<b>Ensure an adequate supply of office space, especially near transit:</b> <i>There is an unprecedented future supply of office space in the Downtown, either vacant, under construction, or in the development review process. There is currently 800,000 square feet of vacant office space and about 4,600,000 square feet in the construction/development process. (Source Avison Young Mid-Year Report, 2020)</i>	<b>Additional office space is not needed for at least 10 years</b>  <b>This Plan refers to the Hub Framework for specific guidance on urban design and office space siting</b>

**References:**

1. Downtown Official Development Plan <https://bylaws.vancouver.ca/odp/odp-downtown.pdf>
2. Downtown Design Guidelines <https://guidelines.vancouver.ca/D003.pdf>
3. Parks Canada, The Standards and Guidelines for the Preservation of Historic Places <https://www.historicplaces.ca/en/pages/standards-normes>
4. Central Waterfront Hub Framework <https://guidelines.vancouver.ca/C031.pdf>
5. Central Waterfront Review, <https://council.vancouver.ca/20171017/documents/rr2.pdf>
6. Metro Core and Economy Land use Plan <https://council.vancouver.ca/20070710/documents/rr1.pdf>



**Comparison of suggested building size in Central Waterfront Hub Framework to proposed buildings in 2015 proposal and current proposal.**