

December 10, 2012

Attn: Mayor and Council  
3rd Floor, City Hall  
453 West 12th Ave, Vancouver, BC V5Y 1V4  
604-873-7621  
[mayorandcouncil@vancouver.ca](mailto:mayorandcouncil@vancouver.ca)

Dear Mayor Robertson and Councillors,

Re: 833 & 837 Keefer Street, Proposed HRA, DE415544

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The Strathcona Residents Association (SRA) Zoning Committee recently received a Notice of Public Hearing for the designation of both 833 and 837 Keefer Street. Although designation is always encouraged, this differs from the original proposal to designate just one of the houses. We still have many outstanding questions and concerns regarding the proposal to develop this property under a Heritage Revitalization Agreement (HRA).

On April 17, 2012 The SRA Zoning Committee provided a letter to City Staff indicating that we were not able to support this proposal because of its excessive massing, density, and floor area. We also had serious concerns with respect to privacy and overlook issues for neighbouring properties. Please refer to this letter attached. In order to remain abreast of any changes, we requested 'Prior-to' conditions for this proposal from City Staff in June 2012. Unfortunately our requests have gone unanswered. Since we have not received notification of any further required changes to this proposal, our position of non-support still stands.

It must be noted that this is one of several applications by Shape Architecture in Strathcona that have demonstrated an aggressive and unsympathetic response to the zoning and to neighbourhood concerns. This proposal has caused a great deal of consternation in our community, particularly for immediate neighbours. There is a sense that neighbour's concerns are not being heard by the authority, and that the applicant is being permitted to proceed with an excessive proposal.

We would remind the authority that an HRA is first and foremost a mechanism to protect heritage buildings. The granting by the authority of some additional density is reasonable compensation for designation. But this is a privilege, not a right. We would respectfully caution that the core purpose of an HRA should not be perverted to include the entertainment of excessive, overly massive, overly dense proposals.

We respectfully request that Mayor and Council acknowledge the inappropriateness of this proposal and direct staff to compel the applicant to fundamentally revise their proposal to better fit the intent, regulations, and guidelines of RT-3 / Strathcona / Kiwassa, inclusive of appropriate consideration of immediate neighbour's privacy and overlook concerns.

Thank you for your consideration of this submission.

Yours sincerely,

Graham Elvidge  
Zoning Committee Chair,  
Strathcona Residents Association

cc: [publichearing@vancouver.ca](mailto:publichearing@vancouver.ca) , Public Hearing 2012-12-11  
cc: [marie.linehan@vancouver.ca](mailto:marie.linehan@vancouver.ca) , Development Planner  
cc: [kim.trafford@vancouver.ca](mailto:kim.trafford@vancouver.ca) , Project Coordinator  
cc: [james.boldt@vancouver.ca](mailto:james.boldt@vancouver.ca) , Heritage Planner  
cc: Zoning Committee, Strathcona Residents Association

encl: 2012-04-17 833 & 837 Keefer SRA ZC.pdf

April 17, 2012

Attn: Marie Linehan, Development Planner  
Development Services, East Wing-3rd Floor,  
City of Vancouver, 2675 Yukon Street, Vancouver, BC V5Y 3P9  
(604) 873-7092  
[marie.linehan@vancouver.ca](mailto:marie.linehan@vancouver.ca)

Dear Marie,

Re: DE415544 833 & 837 Keefer Street

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On April 17, 2012 Members of the Strathcona Residents Association Zoning Committee met at Development Services to review the above referenced project.

We make the following comments:

Excessive Proposal

We are frustrated and disappointed to again be engaging with a proposal from Shape Architecture which can only be described as excessive. The proposal shows little regard for neighbouring properties, provides meager public benefit, and is in contravention of numerous bylaw regulations and guidelines. It does not demonstrate an understanding of the intent of the RT-3 Zoning.

Fails to Meet Minimum Lot Area for Infill.

As individual fee simple properties, neither 833 nor 837 meet the required 4500 sqft. minimum lot area that would permit the granting of an infill building. Property consolidation has been the historical mechanism to achieve this.

Density Without Property Consolidation Unprecedented.

We note that the applicant is seeking a great deal of density without consolidating 833 & 837 into one property. In the past, the privilege of increased densities has come through the mechanism of an HRA, where all heritage buildings are designated, and properties are consolidated with infill straddling the formerly shared property line. Granting density without property consolidation would be unprecedented in Strathcona. The proposed strategy would provide enormous private benefit to the property owner retaining 2 fee simple properties. Whereas rezoning applications are required to follow an extensive process to demonstrate significant public benefit, this proposal seems to provide very little.

Unfair to Previous Applicants.

Granting density without property consolidation would be seen as capricious and unfair to previous applicants, who, in every like-case have been required by the City of Vancouver to consolidate, with all of the incumbent business-case risks.

Proposed Designation Insufficient.

We note that the proposed HRA only proposes the designation of 833. The excessiveness of proposed density and massing notwithstanding, given that there are 2 heritage buildings in question, and given that 837 has already undergone extensive negotiations with City staff resulting in a major development in roughly 2001, we believe that it would be reasonable to expect that both 833 and 837 be included on the historic register and designated also.

Parking Garages Inflate Massing and Floor Area.

As always, we support significant parking relaxations. We respectfully reiterate: In a heritage neighbourhood that was not built with cars in mind, enclosed parking garages present massing and floor area inflation. Applicants propose enclosed parking for two reasons: because off-street parking is required by the authority, and because enclosed parking is FSR exempted. Based on our observations of parking practices in this neighbourhood, enclosed parking garages are rarely used for parking. They are converted to living space or used for storage. We do not believe the City of Vancouver intends to grant considerable extra floor space in this way. We respectfully suggest that it is a major mistake to distort development plans, creating out-of-scale structures to accommodate parking that is a fiction.

Too Many Dwelling Units.

Historically the SRA has been supportive of densities up to 5 units on 6000 sqft. properties. 7 units is excessive, resulting in too much building mass, not enough green space, and too much parking. It is not possible to provide appropriate consideration to neighbours with this kind of density and resulting massing.

Floor Area in Excess of 0.95 FSR

Where conditions for infill are met, the SRA Zoning Committee can not offer support to proposed increases in floor area over 0.95 FSR. We would respectfully caution against *FSR Creep*, and request that the proposal not exceed the maximum 0.95 FSR should conditions for infill be met as permitted in the bylaw.

833 Infill is Excessive.

At 45ft the building depth is far too deep. At 3 storeys and 35ft the building height is far too high. At 2297 sqft. the infill floor area is far too much. The scale of this building would be considered very large as a principal structure; as an infill it is excessive and should not be entertained.

Concern for Precedent.

Aggressive applicants will always ask for more than the RT-3 District Schedule and Guidelines permit. We would urge the authority to recognize the opportunity for regulatory *creep* and *precedent* where excessive densities, massing, and height are entertained. Should 7 units on 2 unconsolidated interior lots with limited public benefit be granted, this type of project will become the new normal for Strathcona. New applicants will expect the same; old applicants, held to the regulations and guidelines, will be livid.

Summary

We would ask City staff to consider the following as our principal areas of concern for this proposal:

- Excessiveness
- No property consolidation.
- Neighbour privacy and overlook issues.
- Limited public benefit.
- Fairness to previous applicants.

We respectfully request that the Authority not allow such excessive proposals to proceed to this level of engagement. Rather, early critique and insistence upon bylaw compliance will ultimately avoid wasting the time of all concerned: the SRA, the Public, the Applicant, and the Authority. We respectfully request that the Authority direct the Applicant to revise their proposal to better fit the intent, regulations, and guidelines of RT-3 / Strathcona / Kiwassa.

Thank you for your consideration of this submission.

Yours sincerely,

Graham Elvidge  
Zoning Committee Chair,  
Strathcona Residents Association

Cc [kim.trafford@vancouver.ca](mailto:kim.trafford@vancouver.ca) , Project Coordinator  
Cc [james.boldt@vancouver.ca](mailto:james.boldt@vancouver.ca), Heritage Planner  
Cc Zoning Committee, Strathcona Residents Association