

## Burke, Teresita

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**From:** Ann Robson s.22(1) Personal and Confidential  
**Sent:** Tuesday, September 18, 2018 11:58 AM  
**To:** Public Hearing  
**Subject:** Comments on Rezoning Application: 1444 Alberni Street & 740 Nicola Street (Item #4, Sept. 18 2018 Public Hearing)

Dear Mayor and City Council,

I have lived in the immediate neighbourhood for several years, am quite familiar with the WECP, and have reviewed the application that is posted on-line. I have also reviewed the Policy and Summary Reports that are associated with this application.

I am urging you not to approve this rezoning application.

My opposition stems from concerns about several issues that have not been adequately addressed.

### The Context:

Representations and analyses of the surrounding context ignore or minimize the extreme level of densification and development in the surrounding neighbourhood. Therefore the descriptions of neighbourhood impacts are incomplete.

This oversight is most evident in the map of the immediate neighbourhood, that is part of the application. This map is outdated and includes only one development site (1550 Alberni) that is described as proposed. That particular site was in fact approved for rezoning in fall 2016.

At the present time, within a two-block radius of the site of the proposed development, applications have been approved for over 700 residential units. Proposals for at least 400 more units are at various stages.

Additional examples of failure to fully consider the surrounding context include the Transportation Study.

*At the very least, shouldn't approved rezoning projects be included and considered as part of all analyses of the neighbourhood impacts of this proposal?*

### Affordability and inclusion:

About 75% of the units that have been proposed or approved within a two-block radius this site are market residential (strata) units. The proposed development is offering 314 more. *Is this the type of housing stock that is needed in this part of the West End?*

There will be no increase in affordable housing on the site as a result of this proposal, that is offering only a one-to-one replacement of the existing rental units on the site. The majority of these will be market rental units. In light of the massive size of this proposed development and current low vacancy rates for rental housing, this offering does not seem sufficient.

*Shouldn't the City's expectations and policies for replacement of this existing rental housing be greater?*

*Furthermore, additional affordable housing within the West End is not even listed as a priority for CAC funds that would be collected from this rezoning (pp. 19-20 of Policy Report).*

Finally, the separate entries and common areas for rental and market residential units is unfortunate and inappropriate in a City whose goals presumably include promoting a diverse and inclusive community. *Certainly there must be acceptable alternatives to this practice.*

#### Laneway and Alberni Streetscape:

The rendering that accompanies the signage and notices for this application is misleading. It presents the towers from the south (laneway side of the site), at the corner of Robson and Broughton Streets. This intersection is in fact the location of a large, grassy, and largely unkempt vacant lot that is unrelated to the site of the proposed tower.

Plans for the laneway are problematic. Childcare drop-off and pick-up in a busy City laneway remains problematic from a safety perspective, due to parking access, loading bays, and city traffic that will also use the laneway.

Furthermore, this rendering does not accurately reflect the impacts of these two large towers on the north side of the towers -- the surrounding Alberni streetscape. The towers are massive and the main entrance is unwelcoming, due to the tall podiums and the design of the entryway.

#### Design Analysis Process:

The design analysis process and extent of changes to the original design are unclear. The original application was not supported when presented to the UDP in November 2017. Resubmission was recommended in order to address various aspects of the design.

However, the Policy Report (p.6-7) states that, apart from a slight decrease in FSR, there have been no changes to key aspects of the proposed design. *Was the resubmission presented to members of the UDP? If not, why not? Why are important changes in design presented as conditions of approval in Appendix B of the Policy Report instead?*

The slimming at the top of the towers is minimal at best and the East Tower pierces one of the City's view cones. *Why is this being permitted, especially in light of the impact of surrounding developments?*

#### Environmental Responsibility and Sustainability:

In the Policy Report, the demolition of the existing rental tower is justified due to the cost of a seismic upgrade. In light of the significant costs of demolition/new construction and the City's explicit commitment to environmentally responsible practice, *how is this demolition defensible? In addition, in the West End there are examples of re-purposing and rehabilitation of older buildings for new purposes -- Pacific Palisades, Coast Plaza Hotel.*

#### Proposed Park on Nicola Street:

The plan to close a block of Nicola Street to create a small park is extremely problematic. Within the rezoning application and associated reports, development of the park is clearly identified as a responsibility of the Park Board.

*Therefore, there are very few details at the present time about a potential design for this proposed park. In addition, there is very little attention devoted to the details of this proposal, from a public safety perspective.*

This park is not a community benefit offered by the developer and should not be considered in this way. Indeed, the 20 foot "dedication" on the west side of the site contribute to additional crowding of structures and green space on the site itself.

Most importantly, this block of Nicola is currently a route for emergency vehicles, particularly Fire Department vehicles, responding to calls in the West End, Bayshore, and Coal Harbour areas. City staff have stated that emergency access will not be affected, despite the street closure and park development.

*How is this possible? How would this safe for either park users or citizens in need of emergency assistance? Now that it has been named, is the laneway being considered as an appropriate emergency access point?*

There are currently several parks and green spaces within a 5-10 minute walk of the site. These include Barclay Square, Marina Square Park, Devonian Park, Lost Lagoon, and the parks/green spaces along Coal Harbour.

*Is a new park in this location necessary? Why not consider other locations that are at a greater distance from the Coal Harbour waterfront and may benefit from closer access to green space?*

In closing, sustainability and good architectural design that is also sensitive to the context should be minimum standards for any rezoning application -- but they are not sufficient to warrant approval of any application.

Please consider the neighbourhood context. Do not approve this rezoning application.

Sincerely,  
Ann Robson

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