



## REPORT

Report Date: June 21, 2022  
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Meeting Date: July 19, 2022  
[Submit comments to Council](#)

TO: Vancouver City Council  
FROM: General Manager of Planning, Urban Design and Sustainability  
SUBJECT: Policy and Directions – Application for Rezoning at 800-876 Granville Street

### **RECOMMENDATION**

THAT Council confirm their support of the objectives of the *Downtown Official Development Plan*, the *Vancouver Heritage Program* policies and the *Single Room Accommodation By-law*, and direct staff to process the rezoning application by Perkins + Will Canada Architects on behalf of Bonnis Properties Inc., the registered owner of the lands located at 800-876 Granville Street to rezone the lands from DD (Downtown District) to CD-1 (Comprehensive Development) District; noting the application does not comply with these policies and the review may result in the General Manager of Planning, Urban Design and Sustainability recommending non-support;

FURTHER THAT the passage of the above resolution will not fetter Council's discretion to consider this rezoning application or to refer it to public hearing, and does not create legal rights for any person or any obligation on the part of the City; any expenditures of funds or incurring of costs is at the risk of the person making the expenditure or incurring the costs.

### **REPORT SUMMARY**

The report seeks Council's direction to uphold the objectives of the *Downtown Official Development Plan*, the *Vancouver Heritage Program* and the *Single Room Accommodation (SRA) By-law*, to protect the scale of development along Granville Street, replace SRO units and preserve resources on the Vancouver Heritage Register.

The application to rezone 800-876 Granville Street from DD (Downtown District) to CD-1 (Comprehensive Development) District, is to construct a 16-storey mixed-use commercial building with office, retail and cultural uses. A height of 79.2 m (260 ft.) and a density of 12.58 FSR are proposed. The site contains the VHR 'A' listed Commodore Ballroom, along with other

character buildings and the State Hotel - a single room occupancy hotel (SRO). Staff have completed a preliminary review of the application and note the proposal significantly deviates from the *Heritage Policies*, the *SRA By-law*, and the height and form provisions of the *Downtown Official Development Plan*. The proposal's significant non-compliance disregards the policy framework established by Council. Further, there is no compelling reason brought forward to deviate from existing policy or consider this site differently from similarly situated sites that have complied with all applicable policies. Staff are seeking Council's direction on these matters prior to submitting the rezoning report for referral to a Public Hearing.

This report describes the intent of existing City regulations and policy related to properties along Granville Street within the *Downtown Official Development Plan*, along with the City's *Heritage Policies*, and the *Single Room Accommodation By-law*. The General Manager of Planning, Urban Design and Sustainability recommends completing the review of the rezoning application in accordance with existing regulations and policy, recognizing that this may lead to a staff recommendation of non-support.

## **COUNCIL AUTHORITY/PREVIOUS DECISIONS**

Relevant Council policies for this site include:

- *Downtown Official Development Plan (1975, last amended 2017)*
- *Granville Street (Downtown South) Guidelines (1991, last amended 2019)*
- *View Protection Guidelines (1989, last amended 2011)*
- *Vancouver Heritage Program (2020)*
- *Heritage Policies (2020)*
- *Standards & Guidelines for the Conservation of Historic Places in Canada (Council-adopted, national heritage standards)*
- *Housing Vancouver Strategy (2017)*
- *Single Room Occupancy (SRO) Revitalization Action Plan (2017)*
- *Single Room Accommodation By-law (2003, last amended 2020)*

## **REPORT**

### **Background/Context**

#### **1. Policy Context**

***Downtown Official Development Plan (DODP)*** – The intent of the DODP is to improve the general environment of the Downtown District as an attractive place in which to live, work, shop and visit. Currently zoned DD (Downtown District), a variety of commercial and non-residential uses are permitted on this site. The site is located in Area K1 of the DODP which allows for a floor space ratio (FSR) of up to 3.50 and a maximum building height of 27.4 m (90 ft.).

***Granville Street (Downtown South) Guidelines*** – These guidelines are used with the DODP for approval of uses or discretionary variation in regulations within the 800 to 1200 blocks of Granville Street. The general intent of these guidelines is to create a distinct urban character for Granville Street as an entertainment district for the city and as a pedestrian-oriented shopping

area for Downtown South; to ensure a high standard of livability for residential projects and for the area as a whole; and to ensure high quality development.

**Vancouver Heritage Program (VHP)** – Adopted in 2020, the VHP sets out guiding principles, vision, goals and directions to further integrate heritage conservation within citywide planning. The associated *Heritage Polices* provide guidance on the conditions under which a rezoning on a site containing a heritage resource may be considered. Specifically, the heritage property on a rezoning site must be preserved, must be seismically upgraded, and a high level of retention and conservation should be proposed. Legal protection of the heritage resource is required. Façade-only retention is generally not considered to be an appropriate heritage conservation procedure.

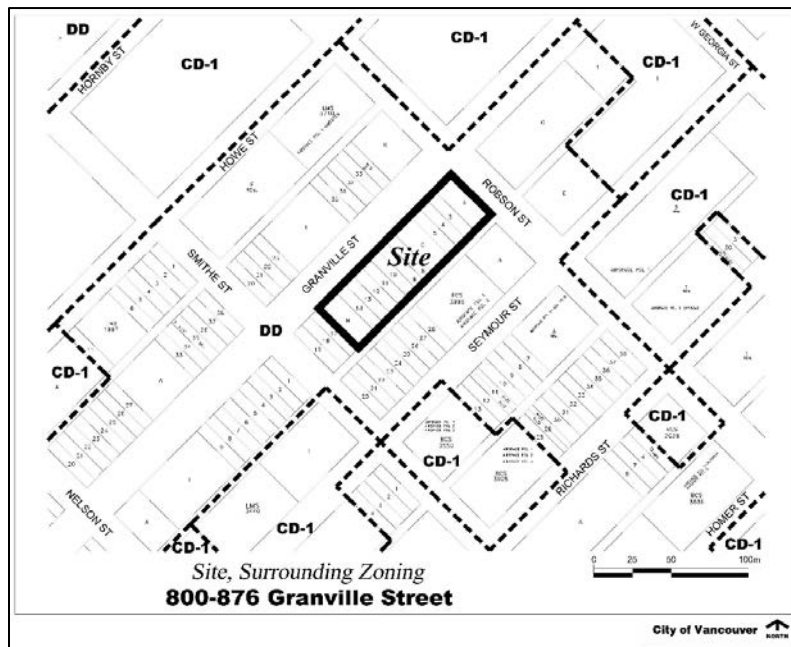
**Single Room Occupancy Revitalization Action Plan** – The *Housing Vancouver Strategy* and the *SRO Revitalization Action Plan* set out a 30-year goal for approximately 7,200 SRA-designated rooms in the city to be replaced with self-contained social housing units for low-income tenants, either in existing buildings through rehabilitation and conversion to self-contained social housing units, or with new social housing on or off site.

**Single Room Accommodation (SRA) By-law** – The *SRA By-law* prevents the loss of low-income housing and the displacement of tenants in Vancouver's Downtown core. SRA includes single room occupancy hotels (SRO), rooming houses, and non-market housing with rooms less than 29.7 sq. m (320 sq. ft.). The By-law prevents tenant displacement and the loss of this housing stock by regulating its alteration, conversion, and demolition. If a building is designated under this By-law, it must fulfill all required conditions related to the conversion or demolition of SRA units. If a conversion or demolition permit is required as a consequence of a development that is subject to a rezoning application, then the SRA permit application should be considered by Council at the same time as the rezoning application.

## 2. Site and Context

The subject site is located on the east side of the 800-block of Granville Street between Robson Street and Smithe Street and occupies almost the entire block face (see Figure 1). The site frontage is 121.9 m (400 ft.) along Granville Street and 36.6 m (120 ft.) along Robson Street, with a total site area of 4,458 sq. m (47,985 sq. ft.). The site is currently zoned DD and developed with eight buildings of varying heights between two to four-storeys. The site includes two heritage sites listed on the Vancouver Heritage Register (VHR) – the 'A' listed Commodore Ballroom and the 'C' listed State Hotel– the latter being a mixed-use building also registered as a single room occupancy (SRO) hotel. The site also includes three character properties identified as having potential for the addition to the VHR.

**Figure 1: Site and Surrounding Zoning**



**Granville Street** – Granville Street is located in the heart of downtown and is one of Vancouver's iconic pedestrian and transit-priority commercial high streets as it is served by several bus and rapid transit lines. It is characterized by a dense cluster of historically significant buildings, many of which are older theatres with large neon signage from the inter-war era and residential hotels or Single Room Accommodation (SRA) designated buildings. Many of these pre-1941 buildings are listed on the VHR, and several other buildings of heritage value are recommended for inclusion in the register.

Granville Street has a distinctive “saw-tooth” building height profile, a result of relatively low buildings of varying heights, constructed on narrow 7.6 m (25 ft.) lots. As a major retail, service and tourist destination with a considerable amount of foot traffic, the Granville Entertainment District area is guided by City policies and guidelines to protect access to sunshine on Granville Street sidewalks, particularly during the noon to 2 pm period. For those reasons, buildings heights are kept lower than the surrounding area, to reduce shadowing on the public realm.

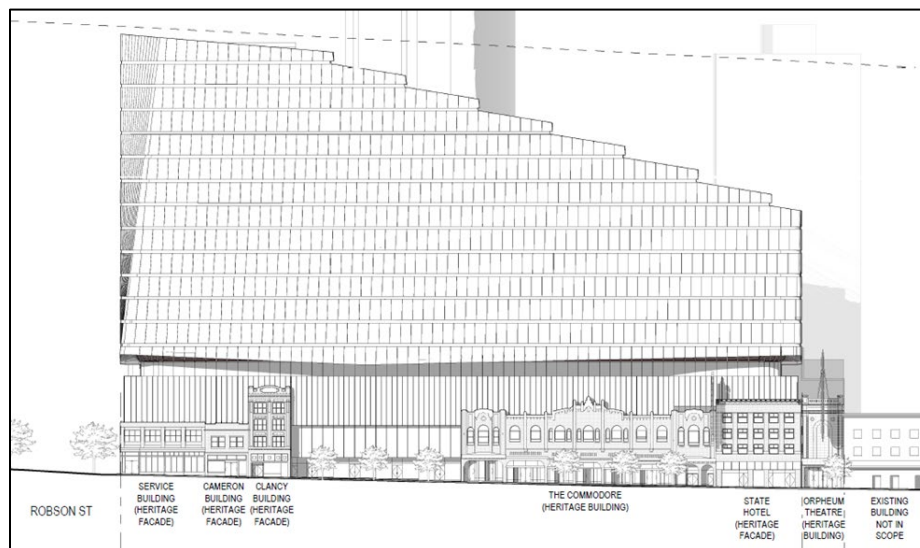
## **Strategic Analysis**

### **1. Proposal**

The proposal is to rezone the site from DD (Downtown District) to CD-1 (Comprehensive Development) to permit a 16-storey mixed-use commercial building with office, retail and cultural uses including limited heritage retention of five buildings, three eligible for addition to the VHR, and two listed on the VHR including the ‘A’ listed Commodore Ballroom (Figure 2). The conservation proposal is limited to façade only retention for all but the Commodore Ballroom, where the approach is to retain the interior space, and support the proposed building above, with a separate structural system. The demolition of the SRO building would result in the removal of approximately 73 vacant units of deeply affordable registered units under the SRA Bylaw, with no provision for their replacement. The application suggests the consolidation of

these sites and limited heritage retention, would free-up space to provide new retail/office space and cultural facilities, while ensuring the long term viability of the Commodore Ballroom. A height of 79.2 m (260 ft.) and a density of 12.58 FSR are proposed.

**Figure 2: Granville Street Elevation of Proposal**



## 2. Heritage Impact and Implications

Under the *Vancouver Heritage Program* and *Heritage Polices* a development proposal that includes a heritage property should be generally consistent with the *Standards & Guidelines for the Conservation of Historic Places in Canada*. A site occupied by a protected heritage property should not be considered for rezoning if the proposal would result in demolition, severe alteration, replacement of original building structure, or with façade only retention.

The proposed scale, massing, placement and form of development are not compliant with the *Vancouver Heritage Program*, *Heritage Polices*, and *Standards & Guidelines for the Conservation of Historic Places in Canada* and is directly detrimental to the retention and conservation levels of the five heritage properties found on the site. Four out of five historic buildings would be demolished except for their principal façades which is not a supportable conservation practice and is not consistent with applicable heritage policies. The same rationale applies to the proposed large building addition above, regarding massing and height. The sheer magnitude of the proposed development imposed on the existing historic urban fabric of the site goes against the *Heritage Polices* conservation principles of subordination and compatibility with a heritage property. As per the Conservation of Heritage Property subsection of the *Heritage Polices*, massing setback from the existing historical building façades is required to reinforce and respect original historical building typologies. The proposed new façade competes with, and out-scales the existing heritage building façades, and the transitions do not reinforce the existing heritage buildings.

The proposed conservation of the iconic Commodore Ballroom, listed in category “A” on the VHR, is diminished by the proposed scale of new construction above. Should a development of this magnitude be allowed, the historic character of a fine-grained urban streetscape as well as its pedestrian-friendly sense of place found on Granville Street may permanently be lost.

Redevelopment of the majority of a city block filled with historic character buildings, with a massive uniform structure would inevitably result in a loss of the historic cultural landscape within the Granville Street Entertainment District.

### 3. Additional Policy Implications

***Development Potential*** – The site is not subject to any overarching plan or policy guidance which enables consideration of a rezoning for the 800-1000 blocks of Granville Street, beyond the provisions of the DODP and existing DD zoning for this block. The site's existing DD zoning permits development of a variety of commercial and non-residential uses. The site is located in Area K1 of the DODP which allows for a floor space ratio (FSR) of up to 3.50 and a height of 27.4 m (90 ft.). The current application proposes to increase the density to 12.58 FSR and includes a total floor area of 56,092 sq. m (603,769 sq. ft.). The proposed maximum building height is 79.2 m (260 ft.). While the proposed height does not extend into the Council-approved protected public view 12.2 (Granville Bridge), the proposed building height and density exceed the DODP provisions for the site.

***Form of Development*** – The application proposes a 16-storey mixed-use building consisting of at-grade retail space, commercial and cultural space on levels 2-4, and office space on levels 5-16. The proposal features retention of four heritage building facades and the conservation of the Commodore Ballroom. The form and architectural expression of the modern addition above the heritage buildings consists of terraced forms clad predominantly in glass and metal materials that steps downwards to the south providing proposed roof decks and outdoor amenity spaces.

***Tower Separation*** – Sites in the downtown typically require a minimum tower separation distance of 18 m (60 ft.) between a residential tower and adjacent commercial towers and 24 m (80 ft.) separation to adjacent residential towers in order to satisfy the livability needs and deficiencies of light and privacy between towers. The application proposes a separation of approximately 6.1 m (20 ft.), at its closest point across the rear lane from the adjacent 42-storey mixed-use building at 833 Seymour Street, falling short of this minimum by 12.2 m (40 ft.). Although a separation of an absolute minimum of 18.3 m (60 ft.) may be accepted between office and residential towers in the downtown area, anything less than that would not meet the separation requirements for livability and light.

***Public Realm*** – Due to the proposed density and height non-compliance with the sites current DD zoning, the proposed development impacts solar access along Granville Street as well as at the corner of Robson Street and Granville Street, one of the busiest pedestrian intersections in downtown. The building massing does not reflect a pedestrian scale on Granville Street as anticipated under the *Granville Street (Downtown South) Guidelines* and the public realm is overwhelmed by the new tower building volume over the heritage buildings.

Maintaining retail continuity at grade along the Granville Street frontage is supported, however successful retail storefronts are fine-grained and varied, and maintain pedestrian scale and interest. Contrary to the stated goal of revitalizing Granville Street by adding job space and new retail, the proposal in its current form could erode vibrancy by removing pedestrian scale and interest.

***Single Room Occupancy Replacement*** – The State Hotel, located at 876 Granville Street, is registered as single room occupancy hotel (SRO) under the *Single Room Accommodation (SRA) By-law*. Per the *Single Room Occupancy Revitalization Action Plan*, longstanding Council policy is to work toward replacement of SRO units with self-contained social housing on a one-

for-one basis (where feasible) in order to maintain housing options for low-income residents. Council consideration is required to approve SRO conversion and demolition permits. The application does not contemplate any replacement housing units for the registered SRO units.

**Culture** – The application proposes to retain the performance space within the Commodore ballroom. Additional cultural space is proposed on level two to four, with uses to be confirmed.

### **PUBLIC INPUT**

To date, public feedback has not been sought for this proposal as it does not comply with Council-approved policies. The proposal will be presented for public feedback as part of the standard rezoning review process.

### **FINANCIAL IMPLICATIONS**

Subject to Council direction and as part of any future rezoning process, staff would report back on applicable developer contributions (e.g. Development Cost Levies, Community Amenity Contributions, and Public Art), at time of referral.

### **CONCLUSION**

Granville Street is located in the heart of downtown and is one of Vancouver's iconic pedestrian and transit-priority commercial high streets. It is characterized by a dense cluster of historically significant buildings and residential hotels or *Single Room Accommodation (SRA) By-law* designated buildings. Proposals including heritage buildings and designated single room occupancy hotels (SROs) should align with the applicable policy direction including the height provisions of the *Downtown Official Development Plan*.

Staff have provided a preliminary assessment of the proposal to rezone 800-876 Granville Street from DD to CD-1 and determined the application has not demonstrated sufficient justification to deviate from existing policies. Other similarly situated properties have successfully complied with the policy provisions set out in the policy plans noted in this report.

This property has no special considerations or constraints that warrant deviation from the established policy framework. Neither have staff identified a compelling public interest to construe a benefit on this property that would not be available to other nearby properties.

The proposal significantly contravenes Council-approved policy. In this way, the application disregards the policy framework and public trust. Staff are seeking Council's direction regarding these policies, prior to submitting the report to Council for referral to a Public Hearing.

The General Manager of Planning, Urban Design and Sustainability recommends completing the review of the rezoning application at 800-876 Granville Street in accordance with existing policy, recognizing that this may lead to a staff recommendation of non-support. Should Council adopt the report Recommendation A, staff would continue processing the application, including public consultation, prior to bringing forward a rezoning report for Council's consideration.

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