

**CD-1 Rezoning: 816-860 West 13th Avenue and 2915-2925 Willow Street - Oppose**

Date Received	Time Created	Subject	Position	Content	Author Name	Neighborhood	Attachment
2025-04-16	09:12	CD-1 Rezoning: 816-860 West 13th Avenue and 2915-2925 Willow Street	Oppose	<p>There are a number of aspects of this proposal that require redesign in order to respond to recent Provincial Housing Legislation, the site context and fundamental long-term planning objectives. Specifically, the following aspects of this proposal require revision:</p> <ul style="list-style-type: none"> <li>• The density of this project is being increased due to the inclusion of below market rental units. The proposed “tower in the park typology” with 3 levels of underground parking is the most expensive form of construction possible, which will require the developer to charge commensurate market rental rates to recoup their investment. Utilizing woodframe construction would be a much more cost effective way to address the City’s rental and affordable rental objectives. There will be no surprises when the affordable housing objectives being touted by this project are not realized.</li> <li>• The west side yard setback must be increased. The design proposes a 6 metre setback to the west property line. This setback does not account for the balconies that project into the west side yard setback. This setback must be increased due to the following considerations: <ul style="list-style-type: none"> <li>o Bill 47 requires the City to allow new high-density buildings with a minimum building height of 8-storeys in this area of the City. The west side yard setback must be increased to reflect at least half of the typically required tower separation of 24 metres to preserve the redevelopment potential of the adjacent sites to the west. Bill 47 obligates the City to protect the redevelopment potential for the remainder of the block, which this proposal does not accomplish.</li> <li>o The Vancouver Heritage Plan was approved by City Council in 2020 and supports the use of density transfers to protect heritage assets through redevelopment. The existing building at 896 W. 13th Avenue is an identified heritage resource. Preserving the redevelopment potential of the remaining block requires the site plan reflect the potential for a building much taller than 8-storeys to be constructed on 888 W. 13th Ave as part of a comprehensive redevelopment that involves the retention of the heritage building. The developer must be required to provide development concept plans for the site to the west demonstrating this project does not impose restrictions on the potential redevelopment of the remainder of the block.</li> <li>o Any intention in the Broadway Plan to restrict the number of towers per block is no longer relevant as the plan is superseded by Bill 47. Preserving the long-term redevelopment of the block requires that a minimum 12 metre setback to the west property line is provided.</li> <li>o The proposal provides an approximately 24 metre setback between the two proposed buildings on the development site. The tower separation is intended to address livability concerns by ensuring there is an adequate separation between the units in these two buildings. The proposed west</li> </ul> </li> </ul>	W.H. Craig	Fairview	

side yard setback results in existing residents not being afforded the same basic livability considerations that the future residents of these buildings are being provided. The projecting balconies along the west side yard impose even more impacts on the residents of the adjacent building to the west.

- The parking garage driveway must be moved to the east to for the following reasons:
  - o The proposed driveway location is approximately 3 metres east of the existing driveway to 888 W. 13th Avenue. The minimal driveway separation will create turning movement conflicts between vehicles exiting these driveways.
  - o The garage/recycling area for 888 W. 13th Avenue is located between the existing driveway for 888 W. 13th Ave and the proposed driveway serving the subject development. The turning movement conflicts created by the proximity of the driveways is exacerbated by the fencing that encloses the garbage/recycling area which significantly compromises the sight lines.
  - o The servicing of the garbage/recycling area requires the garage/recycling trucks to block one or both of these driveways during the collection periods.
  - o The proposed driveway location removes any ability to provide landscaping along the west property line.

- There should be on-site allowance for additional daycare pick-up/drop-off parking. The 6 spaces proposed off the lane for pick-up/drop-off is not sufficient to support the childcare operation. The section of W. 13th Avenue between Willow Street and Laurel Street is already congested in the morning and afternoon with numerous vehicles illegally parking in the vehicle travel lanes while children are being dropped off at the existing daycare at 889 W. 13th Avenue. Daycares all experience the same peak period pick-up/drop-off so the addition of approximately 50 additional childcare spaces will result in further illegal parking that is already prevalent.

- Tree Management Plans should be revisited in order to retain some of the existing trees into the redevelopment of the site. The ongoing redevelopment of Heather Place (immediately east of the subject proposal) has retained and integrated a number of the existing trees into the redevelopment of the site. The Heather Place redevelopment illustrates how to successfully balance increasing affordable housing supply while respecting existing environmental assets and the subject proposal should be held to the same standard.

In addition to the above outlined concerns, as a resident living immediately adjacent to the proposed development, the developer must be required to ensure that construction related activities do not impact existing residents use of our property or the structural integrity of existing buildings. To this effect the developer should be required to do the following:

- Conducting a pre-construction assessment documenting the condition of our building prior to any construction activity (including building demolition

				<p>occurring), installing geotechnical monitoring equipment on/around our building and conducting a post construction impact assessment to ensure that there is no damage to our building resulting from construction activity. The developer is responsible for ensuring the construction does not negatively impact adjacent property and putting these measures in place is required to ensure accountability.</p> <ul style="list-style-type: none"> <li>• Prepare and implement a comprehensive plan to manage construction related dust and debris during and post construction. The developer should be required to enter into an agreement with our strata corporation to ensure that our building is restored to the condition that existed prior to any construction, including covering costs associated with any exterior cleaning of windows and cladding along with repairing any damages.</li> <li>• Prepare and implement a comprehensive construction traffic management plan to manage employee parking and construction related deliveries. The plan must consider: <ul style="list-style-type: none"> <li>o the existing daycare operation 889 W. 13th Avenue and implement appropriate vehicle movement time restrictions to avoid impact on the daycare operation and the associated use of the outdoor play space; and</li> <li>o the existing on-street resident permit parking area on 13th Ave. The area is already subject to high on-street parking demand due to the proximity to the hospital and there is limited resident permit parking in the area. Every effort should be made to ensure limited impact on street parking availability.</li> </ul> </li> </ul>			
2025-04-16	12:14	CD-1 Rezoning: 816-860 West 13th Avenue and 2915-2925 Willow Street	Oppose	<p>There are several elements of the proposed development that require substantial revision to align with recent Provincial Housing Legislation, the site context, and broader long-term planning objectives. Specifically, I want to express the following concerns:</p> <p>1. Project Density and Construction Typology The increased density is being justified by the inclusion of below-market rental units. However, the proposed “tower in the park” typology—featuring three levels of underground parking—is among the most expensive forms of construction. This cost structure will necessitate market-level rental rates, undermining the affordability goals of the project.</p> <p>To truly support the City’s rental and affordable housing objectives, more cost-effective construction methods—such as woodframe—should be pursued. If the current approach proceeds, it is foreseeable that the project will fail to meet its affordable housing goals.</p> <p>2. West Side Yard Setback The proposed 6-metre setback to the west property line is insufficient, especially as it does not account for balconies that further reduce the effective separation. This setback must be increased for the following reasons:</p>	Katie Ferland	Fairview	

Provincial Legislation (Bill 47): This legislation mandates higher-density development (minimum 8-storey buildings) in this area. The west setback must reflect at least half of the 24-metre standard tower separation to preserve redevelopment potential of adjacent properties. As Bill 47 compels municipalities to protect the future development potential of entire blocks, this proposal does not comply.

Heritage Considerations: The Vancouver Heritage Plan (2020) supports density transfers to facilitate heritage preservation. The adjacent building at 896 W. 13th Avenue is a recognized heritage asset. To enable a comprehensive redevelopment, including a taller structure on 888 W. 13th Avenue while retaining the heritage building, the current proposal must include concept plans demonstrating that it does not hinder this potential.

Broadway Plan Supersession: Any previous limit on the number of towers per block under the Broadway Plan is now overridden by Bill 47. A minimum 12-metre setback is needed to protect future development options.

Equitable Livability: A 24-metre separation is proposed between the two towers within the subject site, promoting livability for future residents. The same consideration must be extended to existing neighbors. The minimal west side yard and projecting balconies compromise privacy and light access for adjacent residents.

3. Parking Garage Driveway Location  
The proposed driveway location is problematic and should be shifted eastward for the following reasons:

It is only 3 metres from the existing driveway at 888 W. 13th Avenue, posing a risk of vehicle conflict during turning movements.

The garbage/recycling area at 888 W. 13th further obstructs visibility and exacerbates conflicts, particularly due to fencing that limits sightlines.

Waste collection often blocks one or both driveways, worsening congestion.

The proposed location eliminates the possibility of landscaping along the west property line, reducing neighborhood aesthetic and buffering.

4. Childcare Pick-up/Drop-off Parking  
The proposed six off-lane spaces are insufficient for the scale of the daycare operation. The stretch of W. 13th Avenue between Willow and Laurel Streets is already heavily congested during daycare hours. Without adequate on-site drop-off, the expected increase in childcare capacity will further strain this area, likely leading to increased illegal and unsafe parking behaviors.

5. Tree Retention and Environmental Integration  
The proposal should revisit its Tree Management Plan with the goal of

			<p>preserving existing trees where feasible. The nearby Heather Place redevelopment has successfully integrated mature trees into its design, demonstrating that affordable housing objectives can coexist with environmental stewardship. The same standard should apply here.</p> <p>6. Construction Impact Mitigation As immediate neighbors to the proposed development, we request that the developer be required to proactively manage construction-related impacts. Specifically:</p> <p>Pre- and Post-Construction Assessments: The developer must document the current condition of adjacent buildings prior to any work, install geotechnical monitoring, and conduct follow-up assessments to ensure no structural damage occurs.</p> <p>Dust, Debris &amp; Restoration Plan: A plan should be implemented to control dust and debris. The developer should also enter into an agreement with our strata to restore our property to its pre-construction condition, including exterior cleaning and any necessary repairs to landscaping and fencing.</p> <p>Construction Traffic Management: A comprehensive traffic plan must be in place to:</p> <p>Avoid conflicts with operations of the daycare at 889 W. 13th Avenue, especially regarding vehicle movements during outdoor play hours.</p> <p>Preserve on-street parking availability, particularly within the resident permit zone on W. 13th Avenue, which is already under pressure due to the proximity to the hospital.</p> <p>Other Concerns Timing of Public Hearing: Scheduling the public hearing on the evening before a long weekend appears to minimize community participation and should be reconsidered to ensure transparent and inclusive public engagement.</p> <p>We urge the City and the developer to address these issues comprehensively to ensure the proposal respects both current policy direction and the needs of the existing community. Thank you for considering these critical concerns.</p>			
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