

Grandview-Woodland Area Council
c/o Britannia Community Centre
1661 Napier Street
Vancouver
BC V5L 4X4

Bob Adair,
Development Planner,
Enquiry Centre – Development Services,
City Hall – East Wing,
2nd Floor,
2675 Yukon Street,
Vancouver,
BC V5Y 3P9

Sunday 17 October 2010

Dear Mr Adair:

Re: 1240 Salisbury Drive and 1841 Charles Street

A proposal has been made to develop the site at the corner of Charles Street on lots with the legal names 1240 Salisbury Drive and 1841 Charles Street. The site presently contains three buildings providing seventeen affordable rental units. One of these buildings is a large 1907–1908 mansion known as the Jeffs Residence after Dr Thomas Williams Jeffs (1858–1923). Some preliminary sketches for the development of the site were presented by architects Ankenman Marchand at an Open House held 15 September at the Vancouver East Culture Centre.

This open letter from Grandview-Woodland Area Council (GWAC), the main community association of Grandview-Woodland, aims to provide background information to supplement what was presented at the Open House. The suggestion to write the letter arose during discussion about 1240 Salisbury Drive/1841 Charles Street at the 4 October GWAC meeting.

Section 1 describes the 1240 Salisbury/1841 Charles site and its current use. Section 2 describes the proposal for the site and those involved in the proposal. Section 3 provides some background information that was not supplied at the 15 September Open House, including the path through City Hall for such proposals. Section 4 points out some GWAC concerns with the proposal. Section 5 makes some suggestions about the proposal and the site.

This letter is being cc'd to James Evans (Development Manager), Timothy Ankenman (Architect), Marco D'Agostini (Senior Heritage Planner), David Jung (Project Scoper), and Brent Toderian (Director of Planning).

The letter has been published on the GWAC website and can be accessed directly at www.vcn.bc.ca/gwac/1240Salisbury/10-10-17GWAC_1240Salisbury.pdf. It can also be reached from GWAC's web page about 1240 Salisbury Drive/1841 Charles Street: www.vcn.bc.ca/gwac/1240Salisbury/index.html.

People reading this letter may want to forward it to citizens of Grandview Woodland and people interested in heritage and development issues, and non-market housing in Vancouver.

1. The 1240 Salisbury Drive/1841 Charles Street Site and Its Current Use

A proposal has been made to develop the site at the corner of Charles Street on lots with the legal names 1240 Salisbury Drive and 1841 Charles Street. On the site presently are three buildings containing seventeen affordable

rental units. One of these buildings is a large 1907-1908 mansion known as Jeffs residence after Dr Thomas Williams Jeffs (1858-1923). The postal addresses of the three buildings are as follows:

- Two-storey apartment building facing Salsbury: 1240 Salsbury.
- Jeffs Residence at corner of Salsbury and Charles Street: 1250 and 1250B Salsbury Drive and 1821, 1825, and 1827 Charles Street.
- 1841 Charles Street.

2. The Proposal for the Site and Those Involved in the Proposal

2.1. Present Owner and Potential Developer

Kam Sukul, the long-time owner of 1240 Salsbury Drive and 1841 Charles Street, is looking to sell 1240 Salsbury Drive and 1841 Charles Street to someone who will save and ideally restore the Jeff's Residence.

Mr Sukul has found a potential buyer for the site, who will restore the Jeff's Residence, but wants to develop the site by moving the Jeffs Residence to a corner of the site and adding 17 townhouses to the site in order to pay for the relocation and restoration of the Jeffs Residence.

Grandview-Woodland resident James Evans is Development Manager on the project. I understand from Mr Evans that he is the developer for the project, though ultimately there will be other project partners.

Mr Evans has enlisted the services of architects Ankenman Marchand International to create a proposal for the development of the site. On 15 September, the developer and Ankenman Marchand held an Open House at the Vancouver East Culture Centre (the Cultch) in which they presented some preliminary sketches for the development of the site.

2.2. The Proposal Presented at the 15 September Open House

The plan is to build new foundations for Jeffs Residence and move the building to the corner of Salsbury and Charles. The building would be stripped of various additions made to it over the years.

The sketches at the Open House showed five rowhomes (townhouses) proposed to the north of the Jeffs Residence on Salsbury, and five to its east on Charles, with six more on the northeast corner of the site. There are thus sixteen townhouses proposed, plus 7–10 residences in Jeffs Residence itself (which would be stratified). The townhouses were each 3 storeys, that is, three storeys plus a false dormer in the roof, to mirror the real dormers in the Jeffs Residence.

Also proposed is a ramp to underground parking beneath the site. The ramp would be located at the very northeast corner of the site, with access to the parking along the lane that runs north-south into William Street.

The developer is seeking a Heritage Revitalization Agreement (HRA) for the 1240 Salsbury Drive/1841 Charles Street site. The HRA is a City policy tool for heritage revitalization in return for density. An HRA can "vary or supplement the provisions of a: zoning by-law" (City of Vancouver, 2006).

HRA's are intended to be a powerful and flexible tool specifically written to suit unique properties and situations. The terms of the agreement supercede land use regulations and may vary use, density and siting regulations. If use or density is to be varied, a Public Hearing is required.

I understand that the Open House explained the process of applying for an HRA. According to City of Vancouver (2006), the application process is as follows:

- The City of Vancouver or a property owner indicates that a Heritage Revitalization Agreement could be used in a particular situation.
- The City Planning Department and the owner negotiate the proposed form of development and terms of the agreement.
- The owner submits a development application and/or subdivision application and financial analysis which are reviewed by staff and if supported, approval is subject to Council enacting the HRA By-law.
- The City Law Department drafts the heritage revitalization agreement and corresponding by-law.

- If the proposed use or density is beyond what is permitted by the zoning, Council must hold a public hearing.
- Council approves, then enacts the by-law.
- Within 30 days of the by-law being enacted, the City registers a notice on the property title in the Land Title Office, and notifies the minister responsible for the Heritage Conservation Act.

The presentation at the Open House noted a local precedent: J.J. Miller's Kurrajong residence at 1098 Salsbury Drive (at the northeast corner of Salsbury Drive and Napier Street). An HRA was enacted about ten years ago that led to the restoration of J.J. Miller's residence, with townhouses added to the site to the east of Kurrajong, for a total of 16 strata units (see Higginson, 1999).

Mr Evans is talking with residents of the 1240 Salsbury and 1841 Charles Street site about the possibility of creating a co-op or rental housing on some part of the redeveloped site.

In attendance at the Open House from the City of Vancouver were Development Planner Bob Adair and Senior Heritage Planner Marco D'Agostini.

Ankenman Marchand had prepared an exit survey and has said it will be reporting survey findings to City of Vancouver staff.

3. Background Information Not Supplied at the 15 September Open House

The Wednesday 15 September Open House at the Vancouver East Culture Centre was put on by the developer and architect. While there are only so many display boards that can be shown at an Open House, there nevertheless was a notable lack of basic information presented about the site. There was no mention of the site's current RT-5 zoning, nor mention of features of RT-5 zoning such as building heights, floor space ratio, and number of storeys allowed — all highly relevant to the proposal. Jones (2010) has noted some of this lack of zoning and other information:

Basic data was obtained only through persistent questioning. Like the size of the property, verbally said to measure 155 feet by 132 feet. (That is almost half an acre). There was no comparison of existing zoning with zoning and/or relaxations that might be sought. Even though a desired FSR (floor space ratio) was implied in drawings, only a "guess" of 1.4 could be offered. This would more than double the 0.6 norm for the general area's current RT-5 zoning.

(When Jones refers to "the 0.6 norm" for FSR, he is alluding to RT-5 zoning allowing 0.6 FSR, with an increase allowed to 0.75 at the discretion of the City's Director of Planning.)

I would add to Jones's report that, as mentioned, there was nothing displayed at the Open House about the site's RT-5 zoning (City of Vancouver, 1997). Nor was there mention of allowable building height under RT-5 zoning, which is 10.7 metres (35.1 feet), or the number of storeys allowed, which is 2½.

Also, there was no mention of the number and nature of the "legal lots" on the site. E-mail discussion with Mr Ankeman and Mr Adair after the Open House confirmed that 1240 Salsbury consists of four legal lots (the easternmost one being only eleven feet wide) and that 1841 Charles Street consists of two legal lots, for a total of six. You can see the six legal lots for yourself on VanMap, the City of Vancouver's very useful online mapping tool (www.city.vancouver.bc.ca/vanmap). An orthographic view of the site from VanMap, which shows the six legal lots, is included as an Appendix to this letter.

4. Some GWAC Concerns with the Proposal

4.1 Concern that Lack of Information at Open House Didn't Present Options to Attendees

What citizens need in order to make an informed decision about the site is data for three uses of the site — one current, the other two potential uses. Those uses are: (1) what exists now on the site, (2) what is allowable under the site's RT-5 zoning if someone was to demolish all the buildings on the site, and (3) what is sought under the developer's proposal for the site. The data sought for all three uses is (a) FSR, (b) number of units, and (c) height.

Moreover, it was important to know that the 1240 Salsbury Drive/1841 Charles Street site consists of six legal lots because RT-5 zoning allows two units per legal lot. In theory, that would allow the building on the site to comprise

twelve 2½ storey units with a maximum height of 10.7 metres (35.1 feet). However, in practice — and here is the answer to (2) what the site’s RT-5 zoning allows if all the buildings on-site were demolished — the eleven-foot wide lot is too narrow to build on, thereby reducing the number of units to ten 2½ storey units with a maximum height of 10.7 metres (35.1 feet) and 0.6 FSR.

By contrast — and here is a partial answer to (3) what is sought under the developer’s proposal for the site — the sketches at the Open House showed sixteen three-storey units of approximately 1.4 FSR, plus 7-10 units in Jeffs Residence itself. This is considerably more density than is allowed under the RT-5 zoning.

It would have been helpful if the Open House had at least noted that such data is needed to make an informed judgement.

4.2. Concern that Lack of Information at Open House Renders Exit Survey Data Unreliable

Without the information mentioned in Section 4.1., there are concerns about using data from the exit survey that Ankenman Marchand had prepared, especially answers to the two questions in its Summary section. Those questions were:

1. I believe the project is heading in the right direction, and I encourage the developer to make an application to the City of Vancouver for the improvements shown tonight on the property.

(Please Circle One)

Strongly agree Agree Neutral Disagree Strongly disagree

2. I would like to see the following considerations addressed through the permitting process.

4.3. Problem with Using the North-South Lane for Parkade Access

Part of the proposal for the site is to use the short north-south lane (to 1800 block of William Street) to access underground parkade containing 20+ parking stalls, with a ramp to the parkade at the south end of the lane, near the northeast corner of the site. The lane can be seen on the orthographic map in the Appendix of this letter.

The lane is quite narrow, and Mr Ankenman has acknowledged that the lane is less wide than is standard. It seems to me that two vehicles couldn’t pass each other on the lane, though Mr Ankenman has told me that he has driven the lane a number of times and on one of those occasions met a vehicle in the lane and passed it within the lane.

I remain concerned about situations where two vehicles going in opposite directions come across each other in the lane and one has to back up. If the vehicle travelling south has to back up onto William, that would raise safety concerns for pedestrians and road users travelling along William.

Moreover, the lane seems to be right at the property line of several properties with postal addresses on either Salsbury Drive or William Street. Most lanes in Vancouver (outside of Downtown and the West End) run east-west, and are separated from residences by back yards, putting some distance between residential occupants and the noise, pollution, and vibration generated by vehicles using the lane.

Mr Ankeman has told me that many lanes run north-south, notably behind arterial roads, for example behind C-2 zoned stretches of arterials. This is true for much of Commercial Drive from First to Venables. Nevertheless, in residential areas away from arterials — such as 1240 Salsbury Drive/1841 Charles — I would maintain that the large majority of lanes are as I described.

4.4. Problem with Using the North-South Lane for Garbage Pickup

Related to the previous problem is the topic of pickup of recycling and garbage. I understand that the plan is to locate the buildings’ recycling carts and garbage dumpster on the lane and that a widened area is planned for outside of the parkade entrance which could, if necessary, be a back-up space for vehicles. Mr Ankenman has told me that the plan is for trucks not to need to back up the lane.

4.5. Problems with the Comparison with 1098 Salisbury Drive

The Open House presented the HRA granted to 1098 Salisbury Drive (J.J. Miller's Kurrajong) as a precedent for allowing an HRA on the 1240 Salisbury/1841 Charles site. However, there are two problems with the comparison.

First, the townhouses at 1098 Salisbury Drive are no more than 2½ storeys, which is what RT-5 zoning allows, but the proposal for 1240 Salisbury Drive/1841 Charles Street is for three-storey townhouses. If 1098 Salisbury Drive is the precedent, then why should 1240 Salisbury Drive/1841 Charles Street be granted three storeys?

Second, 1098 Salisbury Drive has parkade access into a regular-width east-west lane that has access at both ends; 1240 Salisbury/1841 Charles does not (the lane is narrow and is a dead-end).

4.6. Concern about the Viability of Co-Op or Rental Housing under the Current Proposal

Mr Evans has worked hard to uncover affordable housing options for the site. He has been in touch with the City, BC Housing, the Canada Mortgage and Housing Corporation (CHMC), the Co-Op Federation of BC, and a number of other organizations, but has not had success finding workable funding for co-op or rental housing.

GWAC, regrettably, must add to the bad news about the proposed redevelopment of the site, which is that moving the Jeffs Residence will require a new foundation, hence the plumbing and electrical (and gas, if present) will probably need to be replaced. New legislation introduced in the last six months is more flexible about building codes than older legislation, but it is nevertheless possible that windows and other fixtures and fittings may need upgrading, all adding to the cost.

The problem collectively with Mr Evans's unsuccessful search for funding, and GWAC's point about the likely need to replace the mechanicals, and maybe upgrade other fixtures and fittings, is that the only likely way to bear the cost of co-op or rental housing would be by increasing the proposed density for the site. As was pointed out in Section 4.1., the developer already seems to be asking for considerably more density than is allowed under the current RT-5 zoning.

5. Some Suggestions from GWAC

Like Mr Sukul and Mr Evans, GWAC wants to see the Jeffs Residence preserved.

GWAC's suggestions are of two kinds. The first kind concerns putting aside the developer's proposal; the second kind concerns the process should some version of the proposal proceed.

5.1. Put aside the Developer's Proposal and Find a Buyer Willing to Keep the Site as 17 Rentals

The developer's proposal is problematic for a number of reasons. The developer is proposing a solution to preserving the Jeffs Residence that costs a lot of money, thereby requiring density to pay for it. Physically moving the Jeffs Residence closer to the southwest corner of the lot will itself cost money, and will likely require replacing the plumbing and electrical, and bringing the building up to code.

The developer appears to be asking for a lot of density in return for revitalizing the Jeffs Residence. Seventeen affordable rental units are lost under the proposal, with no replacements likely.

Maybe the publicity generated by the proposed development of the 1240 Salisbury Drive/1841 Charles Street site will bring forth someone or some solution that has not been hitherto discovered, allowing all the current buildings on-site to be retained.

5.2. Suggestions about the Process Should some Version of the Proposal Proceed

As Section 4.1 noted, basic information at the Open House was lacking, thereby not allowing attendees to make informed choices and rendering data from Ankenman Marchand's Exit Survey of questionable value, particularly data from the two questions in its Summary section (mentioned in Section 4.2).

As Sections 4.3 and 4.4 showed, it is problematic to use the north-south lane to William Street for access to underground parking or garbage pickup. The alternative is access to underground parking or garbage pickup via Salisbury Drive or Charles Street, which would be out of character with those streets and would spoil their appearance.

Given the problems with the Open House presentation and the Exit Survey and the extensive design modification required to deal with parking and garbage pickup, GWAC would ask that, if the developer decides to go ahead with a development application, then a second Open House be held before that development application is submitted.

GWAC also asks that a detailed proposal for the site is made available on the City of Vancouver's website at the earliest opportunity, and that the site proposal includes a comparison of the kind noted in Section 4.1. In addition, GWAC requests an opportunity for community input into the heritage retention aspect of what is proposed for the Jeffs Residence.

If the developer proceeds with a development application after the suggested second Open House, then GWAC encourages the City to be as transparent as possible about the numbers involved in the HRA, and to make its staff report available to interested parties well ahead (i.e., 7+ days ahead) of the Regular Council Meeting at which it is to be presented.

Sincerely,

Dan Fass on behalf of
The Directors of Grandview-Woodland Area Council (GWAC)

(Graham Anderson, Selena Couture, Annwen Davies, Tom Durrie, Dan Fass, Bing Jensen, Brenda "Poesy" Koch, Craig Ollenberger, Richard Penneway, Petronella Vander Valk)

GWAC website: www.vcn.bc.ca/gwac

GWAC web page about 1240 Salsbury Drive/1841 Charles Street: www.vcn.bc.ca/gwac/1240Salsbury/index.html

URL for this letter: www.vcn.bc.ca/gwac/1240Salsbury/10-10-17GWAC_1240Salsbury.pdf

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Cc: James Evans (Development Manager), Timothy Ankenman (Architect), Marco D'Agostini (Senior Heritage Planner), David Jung (Project Scoper), Brent Toderian (Director of Planning).

Appendix: Orthographic view of 1240 Salisbury Drive/1841 Charles Street (from VanMap)

