



West Point Grey Residents Association
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February 16, 2020

City of Vancouver

Dear City Staff and Council,

Re: Open House -- Rezoning Application - 3701-3743 W. Broadway, at Alma St.

Rezoning Application: <https://rezoning.vancouver.ca/applications/3701-3743wbroadway/index.htm>

MIRHPP By-law Policy: <https://bylaws.vancouver.ca/zoning/policy-rezoning-mirhpp.pdf>

This letter is our feedback to the City open house for this project that was held February 13. We continue to be **opposed** to both the scale of this project and the process through which the application has been advanced.

Generally, we think the current rezoning application of 172 ft., 14 storeys (effectively equivalent to 17 storeys), and 5.3 FSR is not appropriate for this site. Instead, the previous 2015 rezoning application (that is now on hold) for 100 % secured rental housing in a 6 storey building on this site should be reconsidered.

As much as we have broader concerns about the Moderate Income Rental Housing Pilot Program (MIRHPP), the subject current application does not adhere to the fundamental requirements of the program as it stands.

We note that the above linked MIRHPP Policies includes requirements under section 3g. that must be met in order to get additional floor area and height, including urban design and policy requirements as follows:

Additional Considerations:

- *Projects must consider and respect transitions to surrounding areas and homes.*
- *Neighbourhood context is an important consideration. In single family and duplex areas, projects in areas with existing precedents for higher buildings will be considered more appropriate locations for additional height and density.*
- *Policy direction in plan areas must be respected (e.g. Marpole, DTES, West End, Grandview-Woodland, Joyce Station Area, Cambie Corridor, Oakridge Transit Centre, Broadway).*

It is our view that the subject rezoning application is at odds with these considerations as follows:

- ***Projects must consider and respect transitions to surrounding areas and homes.***

This application is located on C2 (Height stepped 15-45 ft., 1.75 FSR) and RS1 (Ht. 31-35 ft., 0.6-0.75 FSR) lots and is surrounded by these zones, as well as RM4 (Ht. Stepped 24-35 ft., 0.6-0.75 FSR) to the north.

CONCLUSION: It is physically impossible to reasonably transition from the proposed height of 172 ft. and 5.3 FSR to the surrounding areas and homes.

- ***Neighbourhood context is an important consideration. In single family and duplex areas, projects in areas with existing precedents for higher buildings will be considered more appropriate locations for additional height and density.***

The neighbourhood context as described in previous point is all low density of 0.6-1.75 FSR, 2 - 4 storeys, heights 31-45 ft. with single family, townhouse and low apartments.

The only exception, several blocks to the north and at a lower elevation, is a non-conforming building built in 1970 that predates current RM4 zoning. But, even at 12 storeys (110 ft / ~2.0 FSR) this prior departure from the broader pattern of human-scale development is considerably less intrusive than the subject proposed development.

CONCLUSION: The subject rezoning application for a tower of 172 ft., 5.3 FSR has clearly failed to give adequate consideration to neighbourhood context.

- ***Policy direction in plan areas must be respected (e.g. Marpole, DTES, West End, Grandview-Woodland, Joyce Station Area, Cambie Corridor, Oakridge Transit Centre, Broadway).***

This area comes under policy directions of the West Point Grey Community Vision that was established through a comprehensive planning process and approved by Council in 2010. It established that tower forms of development are not supported.

CONCLUSION: The application does not conform to policy directions for West Point Grey.

In view of foregoing departures from MIRHPP requirements, it is important to recall that a more modest six-storey (3.15 FSR) development was previously proposed for the subject site under the Affordable Housing Choices Interim Rezoning Policy, which like MIRHPP required (as one option) that 100% of residential floor space be secured rental housing for life of the building.

Reconsider Previous 2015 Rezoning Application for 6 storeys:

What's clear is that the previously proposed development, comprising 94 secured market rental units, makes a far better case for conformance with foregoing MIRHPP requirements, and illustrates the extent to which the current application is out of line, with resulting land lift that would be net counterproductive for preserving existing affordable rental stock in the surrounding area.

We also remain concerned that the current application is being justified based on expectations of an extended Broadway Subway to UBC – an expectation that now appears unlikely for the foreseeable future in the absence of funding, and with the Province, Metro Vancouver and TransLink signaling that a UBC extension is not a regional transportation priority.

In our view, the City should not proceed with the current proposal since it does not conform to the MIRHPP requirements and should instead encourage the applicant to revisit its prior six-storey proposal. Recent precedents along West Broadway (e.g. the Parthenon building at Balaclava Street) for secured rental developments are a good model for a neighbourly scale and design, with appropriate setbacks for wide sidewalks and outdoor seating.

Please see the attached Appendix for details and illustrations.

Yours truly,

West Point Grey Residents Association (WPGRA) Board of Directors

Reference Appendix

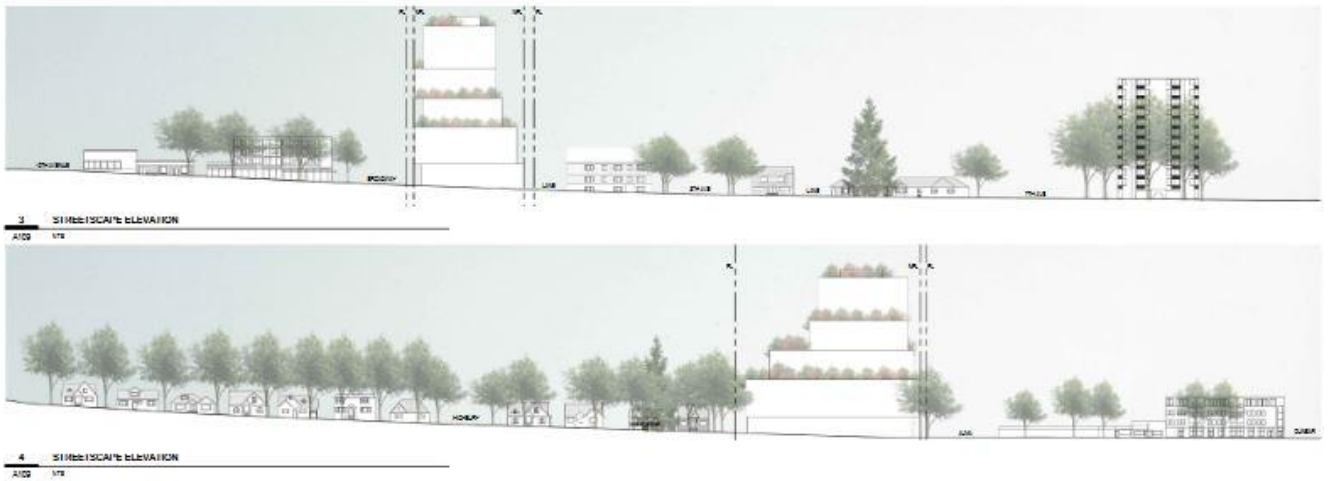
Rezoning Application - 3701-3743 West Broadway

<https://rezoning.vancouver.ca/applications/3701-3743wbroadway/index.htm>

The City has received an application to rezone 3701-3743 West Broadway from RS-1 (single family dwelling) and C-2 (Commercial District) to CD-1 (Comprehensive Development) to allow for the development of a 14-storey mixed-use building including:

- a total of 153 secured rental units (with 20% of the residential floor area assigned to moderate income households);
- commercial uses at grade;
- a total floor space ratio (FSR) of 5.34;
- a total floor area of 11,537.4 sq.m (124,187.5 sq.ft.);
- a maximum height of 52.63 m (172.7 ft.); and
- 53 underground parking stalls and 301 bike spaces.





Streetscape for current proposed rezoning that is out of scale with surrounding area.

Reconsider this Previous 2015 Rezoning Application - 3701-3743 West Broadway (Alma St.)



Above previous 2015 rezoning application (currently on hold) of 6 storeys, 100% secured rental, should be reconsidered as a better fit for the site.

Prior rezoning application:

- 94 secured market rental units;
- 59 studios, 1 one-bedroom, 33 two-bedrooms, 1 three-bedroom
- 7,190 SF of retail space
- A total density of 3.15 FSR;
- A building height of 64 ft.; and
- 99 parking spaces.

**Example of New Precedent Model for Broadway:
3055-3095 W. Broadway (Balaclava St.) - Parthenon Building - 6 Storey 100% Rental**



This is an example of a recently built 100% rental building of 6 storeys with appropriate scale and design that should be considered a model for Alma Street and West Broadway .