



## Heritage Vancouver

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Development Permit Board  
Vancouver City Hall  
453 West 12<sup>th</sup> Avenue  
Vancouver BC V5V 1V4

Re: 105 Keefer Development Application (DP-2017-00681)

In 2017 we spoke against the proposal at 105 Keefer because we could not see principals of contemporary heritage best practice reflected in the application. We also did not see the proposal complying with the intent that “the evolving activities that make this district an asset to the city need to be accommodated contextually” as per the 2017 HA-1A district schedule. There is no change in this current application from 2017 and accordingly, there is no change to how we view this proposal with respect to contemporary best practices in heritage planning, the intent of the 2017 HA-1A schedule and the intent of the HA-1A design guidelines in 2017.

The empty lot at 105 Keefer could be a significant anchor site for Chinatown as a place that responds to the cultural and social context of Chinatown. The vulnerability of businesses to increasing rents and leases, seniors and low-income residents facing [severe housing insecurity](#) and food insecurity, and the closure of businesses like Kent’s Kitchen that are culturally appropriate and more affordable for the incomes in the area are some examples of this cultural and social context.

Additionally, the proposal does very little to address the Chinatown Memorial Square and the monument and the significance of their meanings. The proposal gives no attention to how market condominiums that vulnerable community members will not be able to afford (and retail spaces that most likely will require high rents and result in high prices) contextually fit with the meaning of the memorial. The engagement summary for the [City of Vancouver’s Memorial Square Redesign](#) show the top 3 responses to how the Memorial Square should be used in the future to be 1) remembrance/honouring contributions of Chinese Canadians 2) celebration of culture 3) special events and festivals. An anchor site for Chinatown at this location would engage with these meanings.

The social and cultural context and the meanings of the memorial are about sense of place. The 2011 HA-1A design guidelines (the version in use in 2017 adopted by City Council on April 19, 2011) clearly state the importance of sense of place and the duty of new developments several times. For example:

*Development can enrich and protect Chinatown's sense of place by observing and respecting prevailing scale and parcel pattern, expressing a neighbourhood identity that is authentic and meaningful, and achieving livability and neighbourliness. (p.2)*

And

*It is critical that the planning and design of new developments contribute to achieving the Chinatown Vision Directions and enhancing Chinatown's distinct sense of place. (p.3 and p.4)*

Contemporary heritage best practice addresses place and the role of new development as referred to in the above City of Vancouver documents. We cite three features of best practice:

1. What qualities make Chinatown meaningful and of value culturally and socially as a place?
2. Communities, particularly those who are vulnerable, that use and inhabit the space know very well what those qualities are.
3. Development enhances those qualities of place.

Given the overall [precarity of Chinatown](#) as a place and its need for revitalization as seen through [recent announcements](#) of funding and news reports such as the "[critical need for culturally appropriate seniors housing](#)", please consider a development on the site that respects the guidance on the context and important sense of place as stated in the HA-1A design guidelines.

Sincerely,



Bill Yuen  
Executive Director, Heritage Vancouver Society