



**Bull, Houser
& Tupper LLP**

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| To Public Hearing | |
| Date: | <u>July 21, 2008</u> |
| Item # | <u>6</u> |
| Re: | <u>Bylaw 8383</u> |
| | <u>CCAP</u> |

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|---------------------|-----------------|
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| Our File: | 8338055 |
| Date: | July 17, 2008 |

BY COURIER

City of Richmond
6911 No. 3 Road
Richmond, BC
V6Y 2C1

Attention: City Clerk

Dear Sirs/Mesdames:

Re: Public Hearing Scheduled for July 21, 2008 - Proposed Bylaw 8383

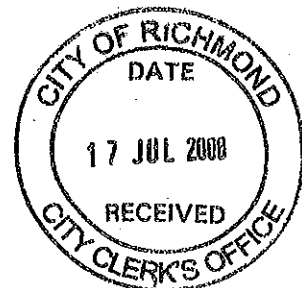
Enclosed is a letter which is intended to be a written submission to the Public Hearing referred to above.

Yours truly,

Bull, Houser & Tupper LLP

C. Decatur Howe

cdh/rlp/1706243
Copy to City Clerk (fax #604.278.5139)



**Vanprop Investments Ltd.
3000-1055 West Georgia Street
Vancouver, BC
V6E 3R3**

**111 New Henry House,
10 Ice House Street, Central,
Hong Kong**

July 17, 2008

The Mayor and Council
City of Richmond
6911 No. 3 Road
Richmond, BC
V6Y 2C1

**Re: Proposed Bylaw 8383 – Amendment to the Richmond Official Community Plan
Bylaw to incorporate the new City Centre Area Plan**

Dear Sirs and Mesdames:

We are sending this letter as a written submission to the Public Hearing scheduled for July 21, 2008 with respect to the Bylaw referred to above.

Vanprop Investments Ltd. is the owner of Lansdowne Centre and the proposed new City Centre Area Plan will have a major impact on Lansdowne Centre. We have been keeping abreast of your City Centre Area Plan concepts as they have been developing and, in particular the changes to the City Centre Area Plan in the proposed bylaw documents that became publicly available last week. The new City Centre Area Plan is a commendable effort to plan for the future of the City, but we have some particular concerns about its impact on Lansdowne Centre, as the Plan is presently proposed.

Lansdowne Centre is a property with great potential for redevelopment, subject to the constraints imposed on it by the lease commitments to its major tenants and now the constraints that will be imposed should the revised City Centre Area Plan be adopted. Our specific concerns are the following:

Major Park. Since the new City Centre Area Plan was first generated a large portion of the Lansdowne Centre property has been designated as a future park – 10 acres approximately. This was done before there was any consultation with Vanprop. We note that the location of the park has been changed from the prime commercial redevelopment area along No. 3 Road to the area along Lansdowne Road from No. 3 Road to Kwantlen Street. That change makes a great deal of sense, both from the point of view of the overall objectives of the CCAP and from Vanprop's point of view, but we still consider the imposition of a major park at this location as being inappropriate.

The CCAP incorporates the concept of the City being focused on "urban villages" centred on Canada Line stations. This concept is a very good one, but with respect to "Lansdowne Village" only, in contrast to the other proposed urban villages, the concept is weakened by having the major park at the intersection which is the center of the urban village. We interpret the urban village concept identified in the CCAP as indicating a high density, high activity centre forming part of the "urban heart of Richmond" (to use the phrase from the CCAP). This concept is captured in the CCAP with respect to the other proposed urban villages or urban centres, but considerably weakened at Lansdowne by having a major park at that location. The park, if there is to be one, should be further away from the center of the "Lansdowne Urban Village" and reduced in size.

We also want to bring your attention to the proximity between Lansdowne Centre and the Garden City Lands. As the Staff Report to the Planning Committee dated June 11, 2008 points out, there is an expectation that the Garden City Lands will provide a significant amount of park (65 acres). It is also pointed out in that report that the existing CCAP and OCP designate those lands as Park or "Public and Open Space Use". We recognize that the Agricultural Land Commission has yet to make a ruling on the future use of the Garden City Lands, but it appears highly likely that those lands will provide a great deal of park or at least green open space of some kind. Having that considerable amount of park at the Garden City Lands, it is not appropriate to have an additional 10 acres at Lansdowne Centre, at the heart of what is intended to be an "urban village" or "urban centre". This has the effect of diminishing the urban village concept at Lansdowne and at the same time having a poor distribution of park land in the City.

Where the Staff Report discusses the key differences between the proposed new CCAP and the existing CCAP with respect to Lansdowne Mall and Richmond Centre Mall, it states as the "Rationale for Change" that: "The new CCAP encourages higher density forms of development with pedestrian-oriented retail instead of large parking areas along No. 3 Road." We agree with that vision for those locations but this is not consistent with having a park at the intersection of No. 3 Road and Lansdowne Road.

Proposed Restrictions on Density and Building Height. We have noted that the most recent version of the new CCAP has been changed from the CCAP Concept which was previously approved by Council and which has featured in the discussions between our representatives and City Staff concerning the future development of Lansdowne. The proposed permitted density for the eastern two-thirds of the Lansdowne Centre property has been reduced significantly: from 2.0 - 3.0 FAR to 1.2 - 2.0 FAR, and the 2.0 FAR only applies to non-residential uses, with the maximum density for residential use being 1.2 FAR. In addition, the maximum building height has been changed from 45m to 25m.

In our view these changes are a very significant step backwards which is not appropriate for the location of this property. This part of Lansdowne Centre is a block away from the center of the proposed "urban village" and the Canada Line station, which indicates that a higher density is appropriate. The density changes also give a preference to non-residential use and discourages residential use.

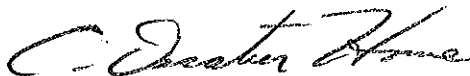
With respect to building height, rather than encouraging a variety of building heights at this location, which the Staff Report indicates is the reason for the change, this will encourage a uniformity of building height at that lower maximum. Furthermore, this revised building height limit ignores the fact that there are buildings immediately to the east of the Lansdowne Centre property which already exist and are well above this maximum. This is not a building height limit that fits the context at this location. We submit that re-development of the Lansdowne property should be permitted at least to a height and density consistent with the developments that have already been carried out to the east of it.

The redevelopment of the Lansdowne Centre property is going to be a massive undertaking – complicated and very expensive. The ultimate impact on the center of Richmond will be very significant. These reduced permitted density and building height limits do not encourage the acceleration of this redevelopment, but rather discourage it.

Since becoming aware of the project to revise the City Centre Area Plan, Vanprop has committed some significant resources to the planning for the future redevelopment of the Lansdowne Centre property. Notwithstanding that we do not agree with all aspects of the new City Centre Area Plan as it was previously set out, in this planning process we have tried to come up with a long range plan consistent with that vision and we have had our representatives meet with City Staff to try to work together on this. We provided to City Staff a conceptual long range redevelopment plan for the site which we thought was consistent with the vision of the CCAP, notwithstanding our misgivings on certain aspects of the CCAP. In particular, our plan contemplated residential development on the eastern two-thirds of the site, reflecting an appropriate density and with buildings of many different heights. We are discouraged to find that the proposed CCAP now has moved in a different direction with respect to density and building heights.

We ask that our submissions on these points be given consideration and we appreciate Council's time and efforts in that regard. We would like to engage with the City to continue the future planning for the Lansdowne site, in the context of the planning for the City Centre.

Yours truly,



C. Decatur Howe,
Director,
Vanprop Investments Ltd.