

From: [Cathy McFarland](#)
To: [External-Clerks](#);
Subject: [EXTERNAL] Submission for Tonight's Public Hearing 323 Regina Street
Date: Monday, January 31, 2022 12:57:10 PM
Attachments: [323 Regina Street HRA letter Cathy McFarland.docx](#)

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Dear Mayor and Council, please find attached my submission for the 323 Regina Street HRA Public Hearing. Best regards, Cathy McFarland

January 30, 2022

Dear Mayor and Council,

I am writing to express my opposition to the Heritage Revitalization Agreement proposal for 323 Regina Street. My letter is coauthored with my spouse who will provide a separate submission. In our view, there are significant problems with this proposal.

1. Size and Placement of Infill: Sadly, here we go again - another substantially *oversized* infill house to be added to the ever-growing collection of oversized infill HRAs in Queen's Park. The laneway house policy was developed to allow for **gentle infill** in our heritage conservation area, and the 958 sq ft. laneway size was deemed by the City to be the appropriate required maximum to achieve this goal. According to the City website, laneway (and carriage houses) are "**small**" detached ground-oriented dwellings located in rear yards. Because they are "**located in rear yards, they will have minimal impact on the existing streetscapes**" and provide "**eyes on the lane.**" In sum, the stated intent of the laneway policy is to increase density in a manner that creates compact and inconspicuous development of residential properties. In direct contrast to this City policy that has been adhered to by many residents, the current applicants are proposing an infill rental home of 1420 sq.ft.. This infill house is not only **48% larger** than that allowed, but is located **facing a main thoroughfare rather than the lane.** Both of these features (i.e., a larger than allowed size and a less than ideal location) will have a negative impact on the streetscape, creating a conspicuous crowded look. These applicants should be able to fulfill their rental needs by staying within the rules and building a 958 sq.ft. home facing the lane.

2. Future of Queen's Park Character: The repeated use of HRAs to bend the rules by adding oversized houses to available back or side yards sets a very concerning precedent for this heritage conservation area. Queen's Park is a treasure and filling up properties with oversize new-build infills is not consistent with the goal of heritage conservation. When community members supported the establishment of a heritage conservation area, they assumed that this type of development would be constrained and the true historic character of our neighborhood would be preserved. There is more to a heritage asset than just the house, and many heritage homes are situated graciously on properties with well-maintained greenspace. Greenspace contributes immensely to the quality of living on a property by preventing overcrowding of neighbours and allowing adequate outdoor living experiences for homeowners and their families. Moreover, greenspace contributes to the community as a whole - we all benefit from this valued, but ever diminishing, shared resource in Queen's Park.

The current HRA applicant expressed this exact same sentiment in a previous letter to Council in which she argued against a proposed infill house that was considerably smaller (i.e., 24% larger than allowed) than the one she herself has proposed (i.e., 48% larger than allowed). She stated: "***I strongly support the Queens Park Heritage Conservation Area. I believe that protecting houses is equally important with protecting the neighbourhood. Its open green spaces, its gardens and vegetation, its boulevards, its proximity to the Park are all strong assets for which the neighbourhood fought in the run up to the HCA decision by Council. The multitude of signs displayed at that time by individual homeowners stated "We support Heritage Conservation." This statement was significant because the residents' support was for both the homes and the neighbourhood itself. There was absolutely no support mentioned for densification and development which would destroy the ambience and historical character of the neighbourhood.***" We couldn't agree more with her eloquent characterization of the problem with infill.

3. Infill House Design: In our view, the proposed infill house is a standard basic infill home that is not particularly complementary to the more attractive character-laden surrounding heritage homes. When infill houses are proposed for this neighbourhood, the community deserves a higher quality heritage architectural design and materials, particularly for infills designed to face main streets rather than lanes. It seems that in recent years, the bar for what constitutes an adequate heritage contribution in HRAs has been set very low.

4. HRA process: This is a retroactive HRA wherein applicants renovated their house in the manner they liked without the encumbrance of protected heritage home "constraints." To be awarded an HRA, the required work should be approved by the City before restoration/renovation begins and applicants are awarded many relaxations and financial benefits. If we allow retroactive HRAs, wouldn't anyone who renovated their old house be allowed an oversized infill house? A significant problem with this HRA is that a number of the alterations detract from its storybook character – this feature, coupled with the

reduction of heritage value by adding infill, renders heritage designation questionable. This home can be protected from demolition by being placed in the protected home category – designation is at a whole different level. Just contrast the renovations done here with the incredible work done on 125 Third Street, a heritage designation also being considering tonight.

5. Issues in the assessment of community support for HRAs: If the City is truly interested in obtaining a valid unbiased assessment of Queen's Park residents' views of HRAs, the City should be using professionals to conduct the survey process rather than untrained laypersons. As it stands right now, the HRA survey process essentially involves the "foxes guarding the henhouse." Applicants and/or their agents, who obviously have a significant vested interest in the outcome of the survey, control everything from the sampling of participants, the selection and wording of survey items, and the analysis/presentation of results. If the City is going to use these surveys as a means to render important decisions for the community, they need to prevent the conscious and unconscious biases that can enter into every stage of survey research. It is noteworthy that, in this case, the applicants' survey (which was handled by someone who admitted she had never done a survey before) yielded a figure of 68.6% support for the project. In contrast, the vote held at the Annual Meeting of the Queen's Park Residents' Association yielded a figure of 20% support. Given that the applicants' survey result included a relatively high proportion of respondents who do not even live here (27% of the respondents do not even live in Queen's Park), and the residents' association results reflect the views of known residents of Queen's Park who cared enough about the issue to show up for a zoom meeting in the middle of a pandemic, which result will you use as the value that better represents neighbourhood opinion? How do you factor in the virtually unanimous lack of support that occurred at the open house?

Thank you for the opportunity to express our concerns. Given the recent decisions of Council to approve numerous other HRAs that prompted the moratorium on HRAs, we have little hope that our letter will make any difference. Many residents we have chatted with see these HRAs as "done deals" for which there is no point in writing to Council. But we have lived in this neighbourhood for 35 years, worked hard to restore and maintain our home without asking for much of anything from the City, and care deeply about what this special and unique neighbourhood will become in the future as it fills up with infill. So here is another letter for you to consider.

Sincerely,
Cathy McFarland
Second Street