



FERNWOOD COMMUNITY ASSOCIATION

May 06, 2020

Mayor and Council, City of Victoria
Victoria, BC

Re: Rezoning and Development Permit Applications for 1230 Grant Street, 1209, 1218, 1219, 1220 and 1226 North Park Street, 1219 Vining Street, 1235 Caledonia Avenue and 1211 Gladstone Avenue

Dear Mayor and Council:

On June 5, 2019 the City's required Official Community Meeting was held where the Capital Regional Housing Corporation (CRHC) discussed their plans to build a 154 unit housing project consisting of two multi-unit five storey residential buildings and three townhouse blocks ranging in heights from approximately three to five storeys. They also discussed the need to remove the existing 3 townhouse buildings of eighteen 2-4 bedroom family units built in 1992 currently on the site.

Over 100 people attended the June 5, 2019 meeting that was held in Fernwood Community Centre Gymnasium. It is fair to say that the majority of attendees expressed overwhelming opposition and were shocked by the size and height of the proposed development and the need to knock down the existing 28 year old townhouses on the site. Support for a smaller affordable housing project on the site was expressed. The CRHC said they were not prepared to do that.

This is the largest and most impactful development in the heart of Fernwood since the building of Victoria High School. To say this proposed development has divided the community is an understatement. Both supporters of this project and those with concerns seem to agree the planning process for a project of this size, complexity and impact on the community was poorly conceived and executed and would have benefitted from better planning and a comprehensive consultation process. In 1994 City Council agreed that an 'integrated site plan' was needed for the area around Victoria High School and the Belfry Theatre. Unfortunately the City did not follow through on that commitment.

Rather than the current piecemeal approach the residents of Fernwood deserve a comprehensive planning process that would have considered the following:

- The possibility of using Victoria High School lands for affordable housing
- The all-weather field and field house proposed to City Council by the Vic High Alumni and the Bays United Soccer Club in 2018
- The increased demand for student and staff parking the new wing to be added to Victoria High School for 200 new students will have

- The apparent need to relocate or abandon the existing tennis/basketball court
- The issue of traffic management and safety resulting from the need for access to and from the new neighbourhood learning centre, day cares in the area (two existing and one proposed), the all- weather field, local businesses and the Belfy Theatre. All this happening in an already busy area with numerous dead-end streets.

The following is a summary of the comments made during discussions that took place in the community over the last 10 months concerning this rezoning application.

Those who support this project believe the need for affordable housing trumps the need to preserve existing potential green space while those with concerns believe the need to preserve potential green space trumps the need for affordable housing in this location. Some of those people don't like the size of the project, its location and the need to demolish the existing 18 units but don't see any available mechanism to discuss other alternatives. Others believed the environment shouldn't have to suffer because there are no funds available to remediate the existing 18 townhouses built 28 years ago. Those 18 townhouses will be demolished and trucked to the landfill and their concrete foundations recycled and new concrete poured. What message does all this send about taking the climate emergency seriously? What message does this send other developers when this is the example being set by Capital Regional District? How does it differ from the argument others make when they say they will take climate change seriously in the future but now we need to continue to do 'X' or 'Y' during this transition period? The benefit of replacing buildings that are less energy efficient is being questioned by some respected critics of this thinking.

In a 2018 article, The Journal of Architectural Conservation said; "For the new building, it takes more than 50 years for the initial emissions from construction to be outweighed by the effects of lower in-use energy consumption". This is especially true when you factor in the 'embodied energy' accumulated from the manufacture of building materials and the construction of the townhouses in the first place. Accounting for the environmental impact from the initial construction process, and the demolition and replacement construction process, supports the long overdue remediation of the existing townhouses. The CRHC, in their letter to the City, say the townhouses suffer from "leaky condo design" and require a complete envelope remediation. The ability to successfully remediate "leaky condo" buildings exists and even though it's costly, surely during the City's and Capital Regional District's declared climate emergency the overall reduction in carbon emissions should be the most important factor.

Those with concerns about the current plan believe the earlier public consultations held by SD 61 were demonstrably misleading and disingenuous. They cite the School District's consultations about the future of Victoria High School, held in April 2018, the decision around which did not include the possibility of needing to lease Victoria High School lands in order to preserve Victoria High School. At both the June 5, 2019 Land Use Meeting and the June 20, 2019 SD 61 public meeting,

held in the auditorium at Victoria High School, supportive applause was given to attendees calling for SD 61 Trustees and Victoria City Councillors to hold a joint public meeting to discuss this proposal.

In addition to the issues raised in the community by both supporters of the need for affordable housing and those with concerns about locating that housing on Victoria High School lands, the Fernwood Community Association has the following concerns about this rezoning application.

The CRHC in their letter to the City says, 'Rather than building on a greenfield site this project is situated on the site of the former Fairey Tech building, now demolished and left unimproved.' However, during community consultation at the time the Fairey Technical Centre was demolished in 2011, the school district assured the community the site would be remediated to make up for the loss of green space when the replacement Trades building was added to the north side of Victoria High School.

The City's 2017 Parks and Open Spaces Master Plan identifies school lands as an important component in the City's green space. Fernwood, North Park and Downtown are identified in the Master Plan as having less than half the City-wide municipal park land per capita. From the City's recently adopted equity lens the approval of this project exacerbates this inequity. As density in the City core increases, the proximity of the green space around Vic High grows in importance and value. A short walk from the hustle and bustle of a busy downtown takes you to a large wide open green space. If we have learned anything from COVID 19 it's the importance of space. That is a rare commodity on this side of town compared, for example, to those within walking distance of Beacon Hill Park and Dallas Road. Please treat us equitably. If you want to know the esthetic and healing value we place on this space we suggest you walk the field behind Victoria High School.

Currently the view looking west from Vic High classrooms looks toward the Sooke Hills. If this development goes ahead then this panoramic view will now include the rooftops of the two proposed apartment buildings with their rooftop mechanical enclosures and vent pipes. Additionally the view of the Sooke Hills would be partially obscured.

With the exception of the Fernwood Road and Gladstone Ave intersection the area around Victoria High School is mostly identified as Traditional Residential. The City's Official Community Plan (page 34 Item 6.1.5) states; "**Traditional Residential** consists primarily of residential and accessory uses in a wide range of primarily ground-oriented building forms including single, duplexes, townhouses and row-houses, house conversions and...low rise multi-unit residential and mixed-use buildings up to three storeys in height located along arterial and secondary arterial roads". The wisdom demonstrated by the Official Community Plan in placing the density on 'arterial and secondary arterial roads' foresees the concerns neighbours currently have with the increased traffic this development would place on streets designated as 'local' in the area around the School.

More importantly the Official Community Plan (page 48, Item 6.19) states; "Prepare a local area plan for the North Park Urban Village, with a focus on lands generally

within 400 metres, to support its development as a complete Large Urban Village...” According to the CRHC this development falls within those 400 metres. This commitment, like the City’s 1994 commitment for a local area plan specifically for the area around Vic High and the Belfy Theatre, are being ignored.

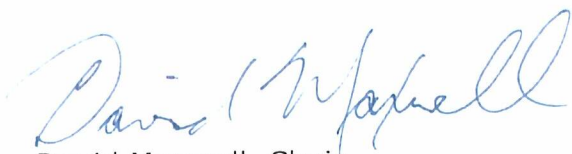
Although Council’s approval of amending the OCP to allow for buildings of this height and massing in lands now designated in the Official Community Plan as “Traditional Residential” does not set a precedent, it does pave the way for similar rezoning applications to the west of this site

Letting this flawed process, along with other unfulfilled commitments, result in the loss of a valuable open space is in your hands. This is especially true as there are other options as to where this housing could be located. The School District’s 2018 Long Term Facilities Plan has identified ‘significant parcels of land’ they consider to be surplus and has committed to using that land for housing or other social supports. This indicates that SD 61 is open to considering other options; for example the Lansdowne School location would be a better choice. It has major bus routes that serve downtown, Esquimalt, UVic and Victoria General Hospital; Camosun College is nearby plus a major employer (Hillside Mall) and bordered by both ‘arterial and secondary arterial roads’.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Joanne Murray".

Joanne Murray, Vice Chair
Fernwood Community Association

A handwritten signature in blue ink, appearing to read "David Maxwell".

David Maxwell, Chair
Fernwood Community Association Land Use Committee