March 18, 2021

Attention: developmentservices@victoria.ca

Regarding: 1260 Grant Street and 1289 Gladstone Avenue (Victoria High School renovation)

Variance Permit Application: Community Feedback

Dear Mayor and Council;

As you know, the developer working with School District 61 has applied for variance permits associated with the renovation of Victoria High School, located at 1260 Grant Street/1289 Gladstone Avenue. The Fernwood Community Association Land Use Committee had an opportunity to discuss this variance application at our March 4, 2021 meeting, in order to prepare comments representing questions and concerns from Fernwood residents.

A description of the feedback received is appended to this letter. These comments are offered in the spirit of encouraging the developer to be a good neighbour and to proceed with thoughtful consideration as to how their proposed project will fit into the existing neighbourhood, as well as how it may affect those living in proximity.

It is generally the practice of the Fernwood Land Use Committee to refrain from commentary and simply to reflect the response of our neighbours. However, in this instance, we would like to mention that we reached out to the developer requesting clarification on the development in August 2020, and never did receive a response. We did this on the advice of the City's planning department, after we requested clarification about the variance application from them. Given the complexity of the variance and the fact that there are multiple development applications concerning School District 61 land in and around Victoria High School, we would encourage the City to advocate for better transparency with the school district so the residents of Fernwood can stay apprised of changes that affect their neighbourhood.

This is especially important given that, as will be seen in the comments below, there has not been any comprehensive planning for the area that accounts for the multiple proposed or potential changes to land use, including this variance permit application, the rezoning application for the area directly behind the school, and the Villages and Corridors local area planning process that includes Gladstone Plaza as an urban village.

Should you wish to discuss these comments further, please contact Kristin or Alieda at fernwoodlanduse@gmail.com.

Yours sincerely, Kristin Atwood and Alieda Blandford, Co-Chairs Fernwood Community Association Land Use Committee

/send to caluc@victoria.ca

# **Comments on the Proposed Variance for the Victoria High School Renovation:**

## 1. Lack of Comprehensive Planning for the Area

Residents were concerned that there is a lack of comprehensive planning for the area. There have been multiple proposals or planning initiatives that involve this area, including this renovation; the proposed CRD housing directly behind the school; the Villages and Corridors Local Area Planning process; and proposals from the Victoria High School alumni for changes to the athletic space associated with the high school land.

The result is that there are many conversations about the school and the surrounding area at tables that are not well-aligned or perhaps even aware of each other. Residents have found it difficult to keep up with the status of different ideas for the space and are confused by the lack of coordination. Multiple residents commented that with such a complex situation, where there are multiple parties involved (the City, the CRD, the school district, etc.), it would be wise to have a more fulsome discussion of how all the different development applications will affect each other, and that greater transparency is needed.

One of the comments we received highlights this well:

"I am a Fernwood resident and a parent of a future Vic High student... This whole project and land deal has been a frustrating process to navigate. This recent request for development variances makes me nervous and it highlights all of the interested parties (BCHC, SD61, City) have their own separate procedures and are making decisions without knowing what the other players are considering (or each others' permit needs)."

There was general agreement among the residents that a more comprehensive conversation about this area, separate from any one application, is needed, so that the community can be assured that the various organizations involved are working in concert. This is especially concerning given that in addition to specific development applications, this area is the focus of considerable discussion about the long-term vision for Fernwood's urban village.

#### 2. Burden Associated with Parking and Street Use

Concern about the parking variance was equally strong. Neighbours are worried there will be insufficient parking given the size of the student body (most of whom are of driving age) and the needs for staff, bus drop-off and turn-around, and potentially a day-care (see also section 3). Residents do not feel there is adequate evidence that the proposed 149 spaces will be enough, given that many staff and students do not live in the neighbourhood. There was no indication in the materials of whether the proposal meets the minimum standards set out by the Ministry of Education for staff parking.

In addition, there are concerns about adequate space for drop-offs and pick-ups, again particularly as there is the potential for a daycare to be located on site. Both Grant Street and Gladstone Avenue are small streets that can only safely bear so much traffic. Adding bus turnins requires that two parking spots on Gladstone Avenue be removed from an are where parking is already at a premium, which affects the vitality of the businesses concentrated in the urban village. Further, Gladstone already bears a significant amount of drop-off and pick-up traffic, since it is the location of the Fernwood Community Centre, which houses its own daycare in addition to many other programs and services.

Neighbours also pointed out that it is difficult to conduct an adequate traffic study to assess parking and drop-off/pick-up needs in the current context, where the lot behind the school is open and being used as overflow parking. As mentioned above, there is no comprehensive planning for the area, but the development application for that land would see most of that lot

taken up by multi-family dwellings. Any traffic and parking studies done in the area currently would need to forecast this potential loss in order to be responsive to future possibilities.

That being said, neighbours also pointed out that the development behind Victoria High School is not approved. If parking variances are approved for the school site and the CRD housing is not built, neighbours worry that the high school variance could be used as precedence for future variance requests that are not appropriate.

Finally, some neighbours commented on the fact that the proposed plan for parking lots effectively eliminates any future possibility of redeveloping or expanding the existing athletic track. While we recognize that discussions of the athletic space are internal to the school district, we would be remiss if we did not mention that the subject had been raised, especially given that some neighbours expressed disappointment and sadness that it appears that upgrades to the track are no longer feasible (see also section 4).

## 3. Insufficient Information about Proposed Day-Care

The presentation at the February 18 Committee of the Whole meeting mentioned in passing that there could potentially be a daycare located on site in the future. There is very little information about a potential daycare in the variance permit application, and neighbours found the lack of details distressing. A number of residents commented that more information is required in order for them to adequately understand how this addition will impact parking, drop-off and pick-up, and the provision of similar services that already exist in the same area.

Neighbours are requesting that the developer provide concrete information on how big the daycare will be, when it will be built, or even if it is part of the current project scope. We are looking for evidence that they have factored in the needs of a day care with regard to traffic and parking. As one neighbour pointed out:

"If there is going to be a daycare, some thought needs to be put into safe access in and out of the proposed location by foot, by bike, and by vehicle - especially given the existing increase to traffic on Gladstone."

#### 4. Impact on Green Space, Recreation, and Tree Cover

Concerns about the athletic track have been mentioned already, but residents also expressed confusion about the green space at the front of the school and whether it would still be accessible by the community. In general, residents expressed a wish for more information on what the site will look like and how the overall green space will be affected. One resident's comments express these questions very well:

"As with much of the site overall, the outdoor learning area will be relandscaped. It would be nice to know whether there will be across the entire site an overall net gain in trees and shrubs (may be in arborists report)? Also, what emphasis will there be on native plants, shrubs, and trees? This could be especially important for the outdoor learning area and the newly proposed greenway adjacent to the two parking lots on the west side of the site, which will be a neighbour to both the Greater Victoria Compost Centre and the future housing project. Given the potential lifespan of many trees, shrubs and plants, it would be great if future generations inherited more drought resistant native species wherever possible."

Concern about the net gain or loss of trees was echoed by other residents, and there was also a query about the existing trees along Grant Street from residents who worried that they could be damaged during the renovation. Finally, some expressed confusion over the proposed 8 metre greenway and asked for an explanation of its intended purpose.

## 5. Height, Appearance, and Impact on Heritage Building

A final area of concern identified by neighbours was related to height, appearance, and impact on the heritage building. Some neighbours expressed concern that the height variance could set a precedent for the area that would inappropriately ignore the distinction between space needed for schools and housing density. For example, one resident said:

"I am supportive of the variance for school purposes only. The population of downtown is growing, and we need spaces in schools to accommodate this growth. I am very leery that approving this will give license for the BCHC to make an argument to allow the housing development, being built behind the school, to be built at the same height (or higher). I am also leery that approving this variance will assume community approval on increased height density proposed in the Engage Victoria Project for North Park, Fernwood and Quadra [the Villages and Corridors Local Area Planning process]."

This concern was echoed by multiple residents. Some residents were also concerned that the addition would diminish the appearance and appeal of the original school, a heritage building.