



1923 Fernwood Road
Victoria BC

July 20, 2021

Dear Mayor and Council;

The Fernwood Community Association is writing in response to the Villages and Corridors Phase 2 Report Summary, which will be presented to Council this coming Thursday, July 22, 2021. The FCA wishes to register the following comments in response to this submission.

It is concerning that a proposed next step emerging from the Villages and Corridors consultation process is being described as the creation of a “draft neighbourhood plan.”

From the beginning of this process, the FCA has been clear that a neighbourhood plan is one that is for the entire neighbourhood, not just pockets of it. Other communities have received support to engage their neighbours broadly and envision their community. This opportunity is being denied to Fernwood, North Park, and Quadra Hillside, and the rationale is not robust.

While it is true that people move through neighbourhoods and the boundaries are somewhat arbitrary, it is also true that people feel strongly invested in their community identity. People desire an opportunity to identify their priorities and concerns freely, which is more easily done when you approach planning at the community level, rather than at the level of specific streets and intersections.

Further, those neighbourhoods that have been able to mobilize a whole-community engagement process have been more successful because people are accustomed to thinking about themselves in the context of their communities and therefore have a more intuitive understanding of what a local area planning process at the community level might entail. We believe that limiting the scope to villages and corridors has had a disengaging effect wherein people do not feel that the process is about the spaces they use or the places in which they live. For example, in Fernwood, Stadacona Park is an important community area, but it was out of scope for this process, while Quadra Village was in scope even though it is quite a distance from our community. This diluted the level of engagement that could be expected in and about Fernwood.

From a committee perspective, the Local Area Plan is used to guide development discussions. Having only fragmented parts of it updated makes it difficult to leverage in conversations with developers, which makes it easy to ignore. The current process does not assist Land Use Committees with developments that fall outside of the streets considered in-scope, and it does not address in a fulsome way many other aspects of community planning that the previous Local Area Plan did, such as parks and open space or arts, cultural, or community services.

There has been insufficient consideration of how planning for villages and corridors will need to align with existing land use and neighbourhood planning concerns.

Because of the siloed nature of the process, the report has failed to fully account for how development proposals in progress will affect the use of the areas in scope. For example, although it is mentioned, there is little discussion of how the proposed 140-unit CHRC housing development might impact the use of lands in the surrounding area, which includes the urban village at Gladstone Plaza, North Park Village, and the ‘between village’ corridors that are discussed in this report.



Similarly, the report suggests that Fernwood has seen little development, but that statement considers only those developments that were approved as of early 2020. It does not take into consideration the development proposals that are currently active, those that are in the pre-application stage, or those that have been recently approved. In the case of Fernwood Village this is problematic, since the vision includes extending the village along Fernwood Road, but no mention is made of the fact that a new development was recently approved at 1913 Fernwood Road that will impact the ability of the village to expand in this direction. It was confusing to read a report about the urban village area that did not even mention this new development.

In terms of zoning, we have been informed that if the CHRC development goes through, it will require unique zoning. It seems inappropriate to suggest that changes to bylaw and the Official Community Plan will be a “next step” when there is no clarity on what such zoning might be, or how that might impact the surrounding area. Fernwood needs a holistic plan so as to avoid potential future conflicts related to design and appropriate use that might arise from the current piecemeal approach.

Members of the Villages and Corridors Working Group have expressed reservations about some of the findings described in the report.

Our Land Use Co-Chair, Alieda Blandford, participated fully in the working group mentioned in the summary report. She has expressed reservations about some of the findings. Specifically, she noted that while some topics emerged from the community members represented on the working group, others seemed to be preconceived by City staff. While we are certainly not arguing that staff should not have ideas about what a neighbourhood needs, we would like to see a clear distinction between ideas that the City brought to the community for response versus those that emerged from the community itself.

Relatedly, the working group received instruction from City planners that they could not discuss things that were considered ‘out of scope’ for the current phase of the process, such as Stadacona Park or the Wellburn’s lot, even when it was clear that the majority of participants felt that such topics were of great importance to local area planning. Transit was considered out of scope, as were green spaces and housing off of the corridors and villages. Yet, a number of ideas contained in the report explicitly address these areas that working group members were told were out of scope.

This is confusing and leads to doubts about the findings. Since the survey only asked about high-level support for generally-described changes, it is difficult to determine whether specific suggestions that are mentioned in the report are broadly supported or not. For example, on page 45 of the report there is discussion of closing Chambers Street in front of Haegert Park. There was no discussion of Haegert Park or Chambers Street in the survey, and it is not clear if this is an idea that arose from focus groups/ virtual workshops or whether City planners identified it on their own. Because our experience with the working group was that sometimes ideas were proposed by City staff rather than being elicited from the community, we are understandably cautious about such specific suggestions

The current planning process represents an undue burden on the neighbourhoods involved.

Whole-neighbourhood planning processes for Victoria West, Burnside-Gorge, and Fairfield/Gonzales took approximately two years each. This Villages and Corridors process has already taken 18 months and is only now moving into the third round of engagement for the *first* phase. There are subsequent phases of Villages and Corridors planning proposed that will affect Fernwood residents; it is reasonable to assume a similar length of time will be required to complete this. If this current process continues, this



means that up to six years may pass before this component of planning for Fernwood – which does not cover the entire community - is complete.

This is untenable for multiple reasons. First, those of us who serve our neighbourhood and represent their interests must sustain our engagement for the better part of a decade in order to ensure adequate representation and attention to our community's needs. This places a clearly unfair strain on our volunteers. Second, in the meantime, Fernwood is without an updated neighbourhood plan to guide local land use decisions. Already we have experienced dismissiveness from both City planners and developers because they consider the existing plan outdated; this will only get worse if we do not receive a holistic community plan in a timelier manner.

It is clear that the Villages and Corridors process has resulted in only a partial vision for Fernwood.

Because of these significant flaws in the current process, we request that:

1. City staff be directed to provide details on the source of every suggestion provided in the report, including broad directions, and also including the very specific suggestions that are mentioned in passing in the report without a lot of supportive documentation.
2. City staff be directed not to draft "neighbourhood plans" as a next step.
3. Mayor and Council reconsider the Villages and Corridors approach and replace it with a holistic neighbourhood planning approach that allows the whole community to engage meaningfully about all issues that are of importance to them, with considerations built in for those areas where there is overlap with surrounding neighbourhoods, rather than continuing a fragmented approach which is essentially confined to a few streets.

We hope that you will take seriously the need to provide residents with an opportunity to engage on this important issue. Where we live is often at the heart of who we are, and those who live in Fernwood deserve an opportunity to engage in a holistic way in envisioning and planning for our future.

Yours sincerely,

Dr. Kristin Atwood, *FCA Land Use Committee Co-Chair, on behalf of the FCA LUC*