



Mayor Helps and Council
City of Victoria
No.1 Centennial Square
Victoria, BC V8W 1P6

13 July 2021

Re: Rezoning for 1205 & 1209 Quadra, 910 View, 903 & 911 Yates & 1045 Yates

Dear Mayor Helps and Council,

Further to our letter of March 8, 2020, the DRA LUC provides the following information as an update. Since our last submission, the applicant increased the proposed height and density, requiring additional OCP amendments that, in turn, triggered additional public consultation process. The DRA LUC facilitated the community feedback period from May 25th to June 25th 2021 for these amendments to the original application. Two hundred and one responses from the public were received either by email or as feedback via the Development Tracker.

The public feedback was overwhelmingly opposed to the project. An analysis of the feedback highlights that 80% of the community responding opposes the project as proposed, 12% support the project but are not from the community (as close as Saanich and as far as Vancouver) and only 8% of local respondents support the Starlight project as proposed.

The following points were raised by the public and represent recurring themes in the community feedback:

- The 900 Yates block is the heart and soul of Harris Green. Demolishing it will destroy the character of this neighbourhood and further gentrify an already overdeveloped area. It's one of the last bastions of what makes downtown Victoria unique and worth living in.
- I do think that the two projects should be revisited with significantly less height, and the designs should be more in keeping with the neighbourhood community plans. Downtown is losing its soul. There should be more consideration regarding building design and overall city planning - too many towers, too close together. Victoria is not seeing the big picture, even Vancouver has standards regarding how many towers on a block and the proximity of buildings, this is missing in our city.
- Victoria is Canada's most beautiful small city, attracts people from all over the world not by its modern high towers but by its historical green and beautiful landscape. This super high concrete tower should not be built in the middle of our residential neighbourhood, blocking the open ocean view, reducing the sun shine time and replacing the current be

loved plaza locates London Drugs and a grocery store which is one of the reason many retired chose this community to live.

- I live in the area and look forward to this development.
- * Completely unnecessary. * Too likely to make the cost of living and doing business in the area increase unnecessarily. * Contrary to greening of the city. * Unwelcome source of construction noise and pollution and GHG emissions. * The block currently occupied by London Drugs, Market on Yates, etc is already nice & familiar & pleasant in character. * I wholly oppose this proposed development strongly.
- This is far too much density, and with the wrong developer. When I research Starlight I discover they are Canada's largest landlord, with a legacy of tenancy problems. Moreover, they are an institutional landlord (investors are pension funds, REITs, etc.). It has been demonstrated such landlords are significantly RESPONSIBLE for the unaffordability in housing stock by scooping up housing stock for rental investment income.
- A monster development in tiny Harris Green-- the city's sacrificial lamb for developers who know the rules when they purchase but ask/expect huge variances. Many more years of constant ear splitting noise, dust and disruption for Harris Green residents who get no benefit.
- 75% of these units are 650 square feet and under. This is not enough for families or sustainably for couples. We don't need more of this.
- I oppose the scope of the project. The height of the buildings is excessive. Where will green space and community space fit into the picture? Where are the playgrounds for local children and those attending downtown day care centres? Density is too high for the site and the neighbourhood. The generic high-rise is an unsustainable model. Please, lower density, more green/space, more growing space for public gardens and seating for community interaction. I am with Yates St. Community Garden and we have 100 people on the wait list. Where will people go to get a breath of fresh air and a bit of quiet?
- I think the City of Victoria should be following the community plan that was developed. I also think the scale of this project is out of sync with the area and will create less liveable neighbourhood. Some density makes sense but the size of these towers is unacceptable.

Comments and concerns raised by the Land Use Committee review are as follows:

- The 23 "affordable" housing units (1.5% of the total 1500) can hardly justify the increase in height and density requested.
- The shadow studies are cropped and do not show the full extent of impacts on neighbouring buildings and streets to the north.
- The London Drugs plaza forms the community heart of Harris Green. This community center will be wiped out and something else put up that is still poorly defined.
- The applicant will provide \$350,000 for "public" art that will form part of the private commercial plaza. What the downtown really needs is usable green space, public amenities and lower densities that enhance the quality of life for residents.

- The City needs to find the resolve to uphold the OCP for this application and every other that comes across their table. The OCP provides the shared vision created by the Community, the City and the Development Industry for how our city will develop and grow. If the City believes that the OCP needs adjustments, then the City should prioritise reconvening stakeholders to conduct a review and make updates that arise as a result of this collaborative approach. The City's piecemeal approach by making exceptions on a project-by-project basis does nothing to ensure the long-term liveability of our city or neighbourhoods and flies in the face of good planning principles.
- The Harris Green neighbourhood continues to receive a disproportionate majority of new housing density for the core municipalities. Council has made no effort to insure that public amenities are provided and liveability is protected. This application will simply continue to impoverish and erode downtown liveability further.
- Despite a billion dollars worth of development downtown the only public amenities provided so far are two midblock walkways. These "public" walkways are currently gated and locked 24/7. The proposed "public plaza" will be private commercial space and largely a paved extension of the commercial retail/restaurant units fronting it rather than a true green space. Management of this private space, if it is to serve any form of public interest, requires far more than just a statutory right of way.
- Just more housing units is the last thing our Downtown Harris Green community needs. Our community has absorbed the greatest number of new housing units with zero investment in creating a complete community; no parks, no playgrounds, no schools, no dog runs, nothing. Meanwhile, we've added 500 units/year for the past 5 years in a very small area of the city. If the City can't deliver the necessary amenities in our community, let's distribute new housing to neighbourhoods that are rich in amenities. The City as a whole needs more housing; missing middle, housing for families, affordable housing. Not including the massive 1500 unit Starlight proposal, there are an additional 3200 residential units in the Downtown either under application at the City, approved, or under construction.
- The density permitted by Victoria's OCP is already one of the most generous in North America. The applicant continues to increase both density and height from the original proposal for this site far beyond these generous maximums. There appears no public benefit on offer that might justify these significant increases when considering impacts on liveability.
- Other developers of rental towers in Victoria have managed to achieve their objectives within OCP maximums. The City is not responsible for insuring the profitability of any project though the granting of excess density.

Most of the points raised in our letter of March 8, 2021 regarding rezoning of the London Drugs site without a concurrent development permit remain valid concerns. The impact of this proposal is far too significant for it to proceed to the granting of irrevocable development rights simply on the basis of the general concept presented to the community. This project is too important to the future of Harris Green and the liveability of the community to rezone almost five acres of land as one application. If it's intended that this project will be built over three phases, we recommend that the rezoning occur over three separate applications. Although a concept presentation is welcome as part of early public consultation, it cannot be considered as

fulfilling the required and necessary public engagement expected for a project of this magnitude, especially when it so significantly exceeds the OCP.

This development will be the largest and most impactful development undertaken in this city in decades. History of development has largely shown that massive attempts such as this are dismal failures in improving the urban fabric, providing humane and enjoyable housing and (in particular) providing real public amenities for cities in exchange for the significant granting of excessive development rights. It is plainly apparent from the community feedback, that residents have legitimate concerns which have yet to be addressed by the applicant. The DRA LUC feels that this application is not ready to proceed to public hearing, and that Council pushing it forward in the face of these concerns will not serve the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ian Sutherland', with a large, stylized initial 'I' and a long, sweeping horizontal stroke at the end.

Ian Sutherland
Chair Land Use Committee
Downtown Residents Association