

HQCOLLECTIVE

Hillside-Quadra Collective - <https://hqcollective.ca>

Building a more accessible, inclusive, and joyful neighbourhood together.

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Mayor and Council
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Victoria, BC V8W 1N9
councillors@victoria.ca

June 8, 2022

Re: Feedback on the Hillside-Quadra Neighbourhood Plan

Dear Mayor and Council,

The Hillside-Quadra Neighbourhood Plan is coming along nicely, and residents have told us that they see many improvements from the previous version based on their feedback. However, there are a few key pieces that residents feel are either missing or, or that need to be strengthened before the plan is approved. Here is a summary of what we have heard:

- On May 23rd, 2019 City Council voted unanimously to ask staff to amend the zoning bylaw and OCP "to limit the permissible uses at 950 Kings Road to a school, park, community centre, gymnasium or fitness centre, daycare centre, art school, cultural centre, community garden or library." **This commitment is not reflected in the current draft plan.**
- The Greater Victoria Public Library's 2010 facilities plan, "[Making Space for the Future](#)" identified the need for a 5000 square foot neighbourhood branch near Hillside Avenue, to be built by 2026 (p13). This need is supported by the commitment to improving library service in the north end of the city in the 2019-2023 Strategic Plan. **The importance of library access in this underserved neighbourhood is not adequately reflected in the current draft plan.**
- Residents of the North East corner of the neighbourhood (near Cook and Finlayson) were pleased to see both a greenway connecting Topaz, Summit, Peacock Hill, and Cedar Hill parks, and a small urban village at Highview and Finlayson included in the plan.
- There is an acute need for a southbound bike lane on Cook Street between Lang (where the Saanich lane ends) and Empress (where one can easily connect with Vancouver Street), where fast-moving traffic is a danger to cyclists. There is also a need for a cyclist-activated button for the pedestrian crossing signal at Hillside and Blackwood.
- Residents would like Quadra Mews to be a pedestrian space (perhaps with the exception of

delivery vehicles serving adjacent businesses at certain times of day). It is currently identified as having "slow vehicle movement", which runs counter to the stated goal of a "pedestrian-friendly laneway with...new secondary storefronts, public seating [and] greenery."

- Public Space proposals #1 and #10 could be combined by creating an outdoor stage at the Warehouse School (the site of a very successful concert as part of the 2021 Out There Art Festival).

Sincerely,

A handwritten signature in cursive script that reads "Vincent Gornall".

Vincent Gornall
Chair
Hillside-Quadra Collective



June 8, 2022

Dear Mayor Helps, Council and City of Victoria Planning Department,

This is the response by the Fernwood Community Association Land Use Committee (LUC) Neighbourhood Plan Working Group in regards to the 2022 draft Fernwood Neighbourhood Plan (Plan).

Engagement held by the Planning Department over the last two years identifies not only the long overdue and complex nature of the planning updates needed for the Fernwood neighbourhood but also the high expectations residents, community organizations, developers and planners have for the draft Fernwood Neighbourhood Plan. While the LUC Neighbourhood Plan Working Group supports a great number of these updates and welcomes the renewed sense of direction inherent in the 89 page draft Plan, our support cannot be whole-hearted; it is tempered by the knowledge that many aspects of the Plan are in conflict with the realities of Fernwood as a neighbourhood and community.

Ahead of the responses below, we want to thank Marc Cittone and Lauren Klose at the Planning Department for their work and for the opportunity to provide feedback. We fully support and look forward to the development of a Community-led Action Guide. Lastly, our Working Group welcomes comments, corrections and discussion: fernwoodlanduse@gmail.com

COMMENTS ON PROCESS

One of the most basic conflicts relates to process. Unlike the updates for neighbourhoods like Fairfield, the Fernwood planning update began as a limited examination of specific areas rather than a holistic look at the entire neighbourhood. Despite considerable pushback from residents, this emphasis on 'Villages and Corridors' is still prevalent throughout the 2022 draft Plan resulting in a document that often speaks more to the City's plans for Fernwood than neighbourhood and community plans for Fernwood.

A related issue pertains to the quality of public engagement around the draft Plan. Was it equitable? Diverse? And inclusive? How many renters and apartment dwellers know about the Plan? How many who are English as a second language? Low income? Not computer savvy? Or exhausted? Every Fernwood resident deserves to hear about the 30 year plan for their street. If a resident does want to question or criticize, the general invitation to call planning can be intimidating, let alone the prospect of presenting at public hearings for the neighbourhood. We suggest an info sheet in every mailbox with some basic info and a phone number to call with a friendly person to answer questions.

ENGAGING INDIGENOUS PERSPECTIVES

While there are multiple areas in the Plan that indicate a desire to engage with indigenous perspectives, as of yet there are no concrete outcomes. In addition to being an interesting analysis of four case studies detailing the often unsettling and difficult but profoundly necessary and rewarding intersections between planners and indigenous peoples, The book *Planning for Coexistence?* (2016) by Libby Porter and Janice Barry, makes an excellent recommendation with respect to methodological concepts for engaging indigenous perspectives. The authors suggest that viewing planning as a "contact zone" (p.33) is a meaningful strategy for engaging indigenous perspectives. We raise this point here because we



support the goals of reconciliation, and also see a need for indigenous perspectives in local, urban planning contexts.

In the following sections, our responses follow the organizational layout of the Plan.

1a. FUTURE LAND USE, RENTERS & AFFORDABLE HOUSING

Another area of potential conflict between the general tenor of residents' views and the offered Plan is the development emphasis of the Plan. The Future Land Use section, particularly when taken together with the Missing Middle Housing Initiative, represents a widescale upzoning of the Fernwood neighbourhood to facilitate mainly residential and some commercial densification. To be clear, the LUC Working Group supports increases to housing and in general principle, zoning for both residential and commercial densification.

At issue for the LUC is the disproportionate and negative impact zoning for development will have on renters, who make up nearly 70% of the Fernwood population and often live in shared, affordable rental situations. Traditionally, both the Tenant Assistance Policy (TAP) and engagement from Community Association Land Use Committees (CALUC) are triggered through rezoning applications as part of development. The upzoning in the Plan signals a loss of the essential triggers, meaning a diminution of effective oversight, leaving potentially vulnerable tenants to bear the brunt of increased patterns of displacement and housing precarity alone.

Upzoning for development will eventually contribute to the number of future homes, but it does not resolve the current problem of little to no access to affordable housing for those in need of a home. In this sense the Plan perpetuates the very inequalities it seeks to solve. Yes, the solution is complex. So too is the situation for renters who have no place to live in the interim period between displacement and finding affordable housing. To start we suggest putting renters first by strengthening protections for renters, tracking displaced renters as well as units lost to development and putting considerable effort into building affordable housing well in advance of all other kinds of development.

1b. FUTURE LAND USE & PROTECTION OF MATURE TREES

Zoning for density as part of Future Land Use also conflicts with the need to maintain the urban forest of Fernwood. While the Plan states that it supports "green and leafy streets" most streets in Fernwood do not have typical boulevards with mature trees. Rather, mature trees are often located in private yards. If the lot is to be developed and the trees found within allowable building footprints, they are not protected by the Tree Protection Bylaw. Additionally, developments tend to use saplings rather than mature trees when planting required replacement trees. In the shift towards increased housing density, Fernwood needs the canopy mature trees provide to mitigate climate change, reduce extreme heat and to absorb smoke and pollution.



2. BAY STREET VILLAGES: POTENTIAL FOR TRAFFIC CONGESTION

As a two-lane transportation corridor with parking allowed, Bay Street is busy. Traffic is already heavy, especially at peak hours and hospital shift changes. Ambulances travel this route to reach the Royal Jubilee Hospital and two bus routes use this corridor along with large delivery and construction vehicles. Encouraging commercial endeavors in the Bay Street “villages” would add to the congestion as would proposed 4- to 6- storey apartment buildings. The reconfiguration of Bay St. in the North Park area to remove parking has increased the congestion effect already by backing up traffic. Average speed of vehicles between Richmond and Quadra is probably about 2 km per hour in busy times. There are some sections where traffic has no room to pull over to allow an emergency vehicle to pass. A lack of on street parking could negatively impact small businesses looking to relocate to the area. If Bay Street is to remain an emergency route, careful practical application of both zoning and planning guidelines may not suffice to ensure smooth access to vehicles of all kinds as well as pedestrian and cyclist safety.

3. SHARED LARGE URBAN VILLAGES: POTENTIAL FOR SHARED KNOWLEDGE

The idea that larger urban villages are shared between neighbourhoods realizes the complex and interconnected nature of neighbourhoods and the ways that people move between them. Although Stadacona and North Park are very different, both could provide valuable information as to what planning practices work and which to avoid in smaller urban villages. For example, how many and what kinds of commercial enterprises need to exist before we start to think of an area as a village? Could spot zoning assist in flexibly allowing a mix of commercial and residential? As these areas grow, what is the best method of planning for safe access across traffic corridors to recreational spaces and parks? Is there adequate crossing opportunity for pedestrians?

4. DESIGN AND BUILT FORM

The Plan emphasizes the value of heritage and character. While we do not encourage a strict divergence from this policy, it is worth noting that much of Fernwood character and heritage is imbued with Victorian, colonial overtones. Let’s not model that history as the only one to replicate. When and where heritage is designated, there should also be an indigenous designation to recognize culturally shared ownership of that space.

5. PUBLIC SPACE AND PLACEMAKING: THE NEED FOR COMMUNITY DRIVEN SPACES

The LUC Working Group supports the Plan’s respect for ongoing evaluation and creation of public spaces as locations for a wide range of short, long-term and future placemaking. However, placemaking activities and the designation of locations as public space should also be respectful of existing patterns of use.

As an example, the Land Use Committee received a letter from the Women in Need Society (WIN) regarding the proposed creation of a public plaza through temporary and/or permanent road closures at Cook and North Park. This letter clarifies how the recent expansion at this location to include



furniture and the road closures as well would have a negative impact on pick-up and drop off routes for delivery trucks and customers. In short, WIN's letter emphasizes the need for planning which is responsive to current business needs in addition to being sensitive to community needs for public placemaking.

Of note: both the North Park Neighbourhood Association (NPNA) and the Fernwood Community Association (FCA) flagged this issue to the planners in the first round of feedback, and indicated that the businesses in the area do not support this idea and that neither association had heard this expressed as a desire of our community prior to this plan being created. We also note that the proposed public space and the road closure appear in more detail in Section 6 of the North Park Neighbourhood Plan, but are mentioned only in passing with no details around the location in the Shared Large Urban Villages section of the Fernwood Neighbourhood Plan (p.41). This idea should really be removed from both Plans.

6a. HOUSING AND RESIDENTIAL AREAS: HOW WILL POLICY CHANGES TAKE EFFECT ON THE GROUND?

The Plan emphasizes the need for increased housing variety including new and diverse multi-unit buildings which are family friendly, accessible and adaptable and affordable. This represents a clear shift away from the Single Family Dwelling (SFD) designation, which in some respects simply puts on paper the reality facing many Fernwood residents, whose homes are in shared or suited houses. Simply put, many of these houses are already multi-unit dwellings. What is new in the Plan is a shift towards increased mixed use to support of small-scale, local business. While it is clear that housing densification, with some commercial densification is needed – and that the Plan makes this possible – what is not clear is how these policy changes will take effect on the ground.

For example, many of the proposed areas for Urban Residential and Housing Opportunity in the Fernwood plan focus on the Bay Street Corridor, where there is no room for expansion for pedestrian or vehicular traffic without removing existing housing. Additionally, the funds gained by the City through development projects paying for bonus density are minimal. While touted as being for public benefit, it is not clear how bonus density truly benefits Fernwood residents.

This is an indication that it is necessary to know the bylaws in detail not just the 'guidelines'. Neighbours won't have any input on specific developments if new developments are allowed under the 'urban residential' designation. Illustration is necessary for Fernwood residents to visualize what the city is proposing (FSR, accepted built to open lot ratios, parking vs. greenspace formulas, building heights, setbacks, allowable variances etc). We suggest that these kinds of illustrations as well as their practical application on the ground in various settings be part of the suggested development of a Community-led Action Guide.

7. HOUSING DESIGN

Design requirements, as with zoning and built forms, should be prescriptive but not so much so that it doesn't allow for any change.



8. MOBILITY CORRIDORS: ACCESS BETWEEN CORRIDORS & CONNECTOR STREETS

The LUC agrees with the assessment that Bay, Shelbourne, Begbie, Fernwood, Pandora and Cook are all major thoroughfares for people travelling to and from work, school and play. We support the idea that these corridors will be in need of revision and upgrading as the neighbourhood continues to grow denser. We would remind planners of the point made above (See 5. PUBLIC SPACE AND PLACEMAKING: THE NEED FOR COMMUNITY DRIVEN SPACES) that vehicles need access not just to mobility corridors, but to smaller connector streets as well, and that creation of public place-making spaces should not necessarily or always take precedence over other access needs.

9. LOCAL MOBILITY POLICIES: GENERAL SUPPORT & NEED TO RECOGNIZE DIFFERING ABILITIES

The LUC Working Group supports the Plan's approach of continued improvements to walk, bike and roll infrastructures. Infrastructure upgrades to greenways, bike lanes and connectors, sidewalks and transit help to create valuable city assets. Strengthening these assets encourages alternate modes of transport. However, people have differing abilities. Mobility for one person may not be feasible for another person and the Plan does not indicate much thought for the mobility challenged. A more sensitive approach to policy planning is urgently needed to make various forms of mobility more possible. One suggestion is to increase the availability of small parks and parklets with benches that allow people to take a break. Another is to specifically evaluate walk, bike, roll and transit routes with respect to levels of physical mobility, with feedback utilized in the upgrading of infrastructure.

10. PARKING: THE IMPACT OF LIMITS & THE NEED FOR A SENSITIVE, TIMED APPROACH TO CHANGE

The intent of the parking proposal is to reduce very substantially car ownership and use in Fernwood, while making short-term parking more available for visitors to the new commercial facilities to be built at ground level. Removal of 'Resident Parking Only' where that exists, and putting time limits on parking, are measures that will be extremely hard on Fernwood residents and people who come by car to work here. At present most streets are heavily parked on both sides at most hours. To avoid real hardship and real pushback, the timing of the intended changes in relation to each other must be very sensitive. Don't, for example, prohibit parking in Fernwood before the new local shops begin to appear. And do improve bus transit. The bicycle network is mostly in place now or under construction, but not every transportation need in a community of 10,000 and more can be met by bicycles.

11a. PARKS: OMISSION of STADACONA PARK

We would like to flag that Stadacona Park is missing from the list of Parks, Open Spaces and Community Amenities serving Fernwood (p. 82), and want it reinstated as a park/amenity within the boundaries of Fernwood.



11b. PARKS: NEED FOR ADDITIONAL PARK SPACE AS WELL AS OPEN AND COMMUNITY SPACE

The 11 sites listed by the Plan as “Parks, Open Spaces and Community Amenities” (p. 82) include eight parks. The Plan urges considerable increase in the space for “Open Spaces and Community Amenities” over the next twenty years but is more than satisfied with the present park area and willing to transfer some of it into the other categories. We agree that Fernwood will need more spaces for open spaces and amenities. How could it not, looking at twenty years of rapid future population growth which is starting now? In this future context the Plan’s stipulated goal of connecting existing parks through greenways makes sense.

However, it also reinforces the urgent need to increase parks, because we are deficient in them with our present population. It is a remarkable and major flaw in the Plan that it doesn’t recognize that need. It is surely unnecessary to emphasize that if an additional 2,000 or 3,000 people or even more are coming to Fernwood, their physical and emotional well-being will require opportunities to be outdoors in all seasons enjoying the physical attributes of the Island. Many of the newcomers will be living in small suites in 4-5-6-storey buildings with little opportunity to be in the outdoors.


According to the Plan, it is necessary to look to the *Parks and Open Space Master Plan* to see what is planned for Fernwood parks. “Prioritization and resourcing for parks planning, acquisition, and improvement projects are provided through shorter-term strategic plans and budgeting” (p.81). It seems a terrible mistake to leave parks planning to an entirely separate process outside the Plan when parks will be more and more essential as we add the housing for – I would guess – a very large proportion of the 21,470 people expected to arrive in the coming years. We suggest the empty lot (for sale) at 1326 Pandora as an ideal location for a small park with a community garden. There is ongoing housing densification in the surrounding block, as well as a loss of park, open and amenity space nearby at Vic High.

11c. PARKS: THE LOSS OF PARK, OPEN AND AMENITY SPACE AT VIC HIGH

The Plan is particularly misleading in failing to update the references to Vic High. An analysis of the Vic High project at the time it was under discussion noted that before the additional construction, the school already had inadequate ground space for the students and that after the upgrade, the grounds would be half or less of the amount of acreage required by School Board policy. Currently there is a proposal to build daycare studios at Vic High, near The Belfry just off Gladstone Avenue, which further diminishes available green space. The contribution of Vic High to the park space and open space in western Fernwood has been enormous and its loss will be very significant.

11d. PARKS: THE NEED TO REMEDIATE ROCK BAY CREEK AT ALEXANDER PARK AND BEYOND

Rock Bay Creek tends to flood sections of Alexander Park on a yearly basis. Remediation is needed at this location, and should be completed in tandem with plans to daylight and celebrate the creek. Remediation is required in other areas as well, as the creek contributes to excess water in nearby yards and homes.

 @WeAreNorthPark
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Mayor and Council
City of Victoria

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CC: board@npna.ca, caluc@npna.ca

June 6, 2022

Re: North Park's May 2022 Draft "Village and Corridors" Local Area Plan

Dear Mayor and Council,

I am writing today on behalf of the North Park Neighbourhood Association (NPNA) and our Land Use Committee (LUC) regarding the May 2022 draft of the North Park Neighbourhood Plan. [We provided comments on the North Park draft directions in January](#). In this letter, we will speak to the points raised in our previous correspondence in addition to the feedback we have received on the North Park recommendations. **We have used our January letter as the starting point here and red text to indicate where we have added new comments.**

As we stated in our January 2022 letter, we find that the overall content in the North Park Neighbourhood Plan is supportable and seems to reflect what residents have communicated throughout the process, as well as what the NPNA hears from residents on a regular basis.

Our January 2022 letter lists several key topic areas from the draft plan and highlights areas of concern and potential recommendations. Here we reiterate and elaborate upon those comments based on the [May 2022 version of the North Park LAP](#).

Equitable Access to Green Space

To begin with, the NPNA would like to emphasize the importance of free access to greenspace in the neighbourhood. Many families/residents live in multi-family housing without access to private and public green space. With the [wide economic spread of the neighbourhood that includes many households living with low income](#), accessible greenspace that does not require travel is important for the well-being of residents.

[According to City of Victoria data](#), North Park has one of the lowest rates of green space per capita (1.23 hectares/1000 residents). This calculation includes Royal Athletic Park in the analysis despite being inaccessible most of the time. The draft plan acknowledges that additional green space is desired, and that Central Park and RAP could use enhancement, but the plan should more

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explicitly address why this is important. The LAP notes involving the community in a comprehensive site plan in any enhancements to Central Park. The active participation of the community is essential for protecting this park and ensuring it serves the needs of the community. We suggest a similar approach is taken for the future of Royal Athletic Park and the adjacent parking lot at 940 Caledonia.

The May update includes directions to "add publicly accessible green space" in North Park. It also makes the recommendation to "Continue to expand public access and programming at Royal Athletic Park and consider other changes and improvements as part of a future planning process." (11.10, page 91)

We feel that this lacks the substantive policy recommendation and direction to improve equitable access to green space in North Park.

We absolutely support the re-envisioning of Royal Athletic Park and sincerely wish that this recommendation was more detailed and definitive. As of yet, the City has failed to implement an equity lens to land use, parks & infrastructure projects (Crystal Pool, a Community Centre for North Park, use of Royal Athletic Park, a plan for 900 block of Pandora).

North Park's population is going to continue to grow. Our existing green space allotment is already far below the City average despite North Park being home to an over-concentration of subsidized housing, supportive housing, drop-in services, substance use services, regional facilities, health facilities, and government agencies and buildings, etc. These "regional burdens" are not in balance with the "neighbourhood benefits" such as accessible green space and free public facilities (of which there are none). Based on the existing OCP, DCAP, and draft North Park LAP and Villages and Corridors plans, North Park's population is expected to grow substantially, meaning that the current green space deficit will become even more substantial.

Topic	Details	Recommendation
Green/leafy streets	The community responded well to the emphasis on green/leafy streets and on providing a range of housing types. This includes affordable housing in quieter, residential areas rather than only on main arterials.	
North Park Light Industrial Zone	Community members appreciate the artisans and makers along North Park	

	Street, reflecting the present and historic light industrial uses.	
Quadra Cultural Corridor	The encouragement of the Quadra Cultural Corridor respects the existing cultural uses and plans for growth and improvements, including a small commercial village near Central Park and improving transit and pedestrian infrastructure. This was well received, albeit with some questions about what it would look like once achieved.	
Family-oriented units	The draft plan acknowledges the desire for a diversity of housing types but does not specifically mention the need for 2 and 3+ bedroom units. North Park wishes to retain its families and encourage them to move here, and many new developments focus solely on 1-bedroom or studio units.	<p>Add language to the draft plan and/or design guidelines to encourage a mix of unit sizes, including 2- and 3-bedroom units. This should apply to both market and affordable projects.</p> <p>Recommendation 6.7, the Interim Family-Oriented Housing Policy cites that two and three-bedroom units (as well as other family focused amenities) will be encouraged until a family housing policy is developed.</p>
Pandora Avenue	The draft plan refers to the unique context of Pandora Avenue but does little to expand on this. As the NPNA has recently discussed in communications regarding the proposed community space for 930 Pandora, the situation on Pandora Avenue has become untenable and requires a comprehensive and coordinated approach from all levels of government. People currently residing on the 900-block of Pandora or using services there, deserve to	<p>We reiterate the request that the City work with the provincial and federal governments, service providers, businesses, and residents to improve the situation on the 900-block of Pandora.</p> <p>We appreciate the acknowledgement about the "unique physical nature of Pandora Green" (page 52). We also acknowledge adding a section about the Pandora Corridor that</p>

	<p>have the supports they need, while all who use the space deserve to feel safe while doing so. Land use planning alone will not address these complex needs, and we ask that the City work with the provincial and federal governments, service providers, businesses, and residents to improve the situation on the 900-block of Pandora.</p>	<p>alludes to the "...several community support services are on or near Pandora." And the statement that "The community recognizes the opportunities and challenges created by Pandora's current functions and desires an inclusive approach to future planning processes - including those who need support and others who spend time in the area."</p> <p>As the NPNA has stated repeatedly, plans to address the situation on the 900 block are incredibly lacking. We thank the planners for including this section but note that this does not include any concrete recommendations or policies.</p>
<p>Equity, Diversity, Inclusion, Justice</p>	<p>The LAP update process was well underway when the City hired its Equity, Diversity and Inclusion (EDI) team. While we acknowledge that the EDI team is working on specific projects, we feel equity was not emphasized enough in the draft plan. For example:</p> <p>The NPNA has been communicating for several years the impacts of the concentration of supportive housing and social services in the neighbourhood, and has been advocating for a distributed model across the City (and region). The draft plan does not recognize this, despite it being a key land use and social</p>	<p>That the draft plan is explicit in its equity lens/approach, that the EDI team is more involved in local area planning, and that the neighbourhood maps that are currently in development by the EDI team be included in the LAP to demonstrate the current landscape in North Park.</p> <p>The comments made above in our January 2022 letter, remain relevant for the May 2022 version as well.</p>

	<p>planning issue.</p> <p>Equitable access to green space also becomes increasingly important, as density increases..</p>	
<p>Concentration of social services in North Park Village</p>	<p>Between the existing zoning and Temporary Use Permits, the core of the Village (the corner of Cook Street and North Park Street) has become home to 5 individual services within a 1-block radius aimed at harm reduction and addiction. Additionally, while the OCP and draft neighbourhood plan envision commercial uses turning the corner from Cook Street down North Park Street, there is a concern that additional existing commercial spaces in the Village will be lost to non-commercial uses, especially social service providers. There is substantial value in the services currently being provided, and we believe in a distributed model that sees every neighbourhood and region offering some of the services currently located in North Park. However, the overconcentration of these services are limiting space and opportunity for the variety of businesses, services, and amenities that make up a vibrant, inclusive commercial village. A good local area plan should have policies to support more commercial uses and address the concentration of services that is currently occurring.</p>	<p>Create policies that specifically address the balance between commercial uses and service uses, to avoid an over concentration in the Village.</p> <p>Create policies that address the density of alcohol and cannabis-related businesses.</p> <p><i>The May 2022 version includes policies 1.7.1, 1.8.2, 1.8.3, 1.8.4 that acknowledge the over-concentration of services in North Park neighbourhood and North Park Village. The language used of (maintain, encourage, contemplate, recognize) leaves much to be desired and does not seem to match the level of urgency that many North Park residents feel about the direction and livability of their neighbourhood. However, we are pleased to see reference to a " fair distribution of community services, social services and facilities across the city, to support all parts of the population."</i></p> <p><i>This is a step in the right direction, but once again lacks any substantive detail to bring it to fruition.</i></p>

<p>A distinct North Park “feel”</p>	<p>We appreciate the land use designations and design guidelines that encourage a distinct neighbourhood feel from the downtown core. In January, we wrote that we felt the distinction between Downtown and North Park could be delineated more clearly.</p>	<p>Create specific design guidelines for the overlap area between the DCAP and North Park LAP, where the height/densities outlined in the DCAP are allowable, but the design guidelines emphasize the unique look and feel of North Park</p> <p><i>We note that the newest draft of the plan includes more information about the “North Park Transitional Area” (pg. 55) that is intended to “provide a transition from the taller, compact built forms in Downtown to the North Park neighbourhood.”</i></p> <p>There are many layers of policy that overlap in North Park (OCP, Local Area Plan, Downtown Core Area Plan and associated design guidelines). Some of the land use designations in the May plan support this distinctiveness (such as the Industrial Employment-Residential designation along North Park Street), but the Core Residential areas that are subject to the DCAP remain an area of concern.</p> <p><i>Other than designating a “Transitional Area” the May plan still does not make it clear how the distinct feel of North Park should be achieved.</i></p>
<p>A vibrant public gathering space in or adjacent to</p>	<p><i>There is wide support for gathering spaces in the neighbourhood. The success of the Vancouver Street Plaza</i></p>	<p><i>This concern has been shared repeatedly throughout the engagement process by the NPNA</i></p>

<p>North Park Village: A Pedestrian Plaza in North Park Village</p>	<p>has shown the appetite for a gathering space matched with programming and activities.</p> <p>However, the majority of the existing business owners & operators at the North Park & Cook Street intersections expressed concerns about the proposed street closure and pedestrian plaza on North Park east of Cook Street.</p> <p>The business owners and operators shared how this street closure would add obstacles to their operations and that this is the main route for deliveries and customer access to their businesses.</p>	<p>and by the businesses. We recommend that the specific location of North Park east of Cook be removed.</p>
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Comments on Process

The Villages and Corridors engagement process began in 2020 to understand the community's key issues, opportunities, and big ideas. Throughout the process, the NPNA received several comments regarding from community members who were confused about how the public engagement process was organized. Some residents have expressed concern about survey distribution (specifically when it comes to apartment buildings and renters. Other community members expressed that they were not notified adequately and were only contacted if they had previously participated in public engagement within Victoria. Aspects of the engagement method used (ie. requiring a user profile to complete online surveys), while for others the framing of "villages and corridors", the jargon used, as well as the time required to engage with the material were barriers to participating.

We would also like to express our support for the [Hillside Quadra Neighbourhood Action Committee's letter in response to the May 2022 draft of the LAP](#). Their letter outlines the change in scope after consultation, especially in relation to the Evergreen Terrace development. Throughout the Villages & Corridors process, it is our understanding that the recommendations included for the Evergreen Terrace in the May 2022 draft plans were not included in the consultation and engagement. Similarly, the recommendations relating to the missing middle policy development were also not included in the consultation and engagement.

As we wrote in January, the draft plan provides a good high-level blue-print for many aspects of the neighbourhood's future, but misses some key components - some of which were included (to

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varying levels of detail) in the May update. Throughout the process, staff communicated that some topics, such as parks and community centres, were out of scope of the LAP. It may be too late in the process to change this direction, but residents and NPNA board members found the process sometimes frustrating due to so many issues being "out of scope". Here we reiterate and elaborate upon those comments based on the [May 2022 version of the North Park LAP](#).

For example:

- North Park has been asking for a Community Centre for some time. This has been communicated with planning staff throughout this process, and there is some acknowledgement of exploring possible locations in the draft neighbourhood plan. However, our understanding is that the location/development of a community centre falls within the Facilities Master Plan for the City. We have been told that there will be an update to the Facilities Master Plan at some point in the future, but timing and scope of the engagement for this has not been shared. This has resulted in the community feeling like their desire to discuss a community centre is being brushed off. A reminder that the NPNA's letters about the proposed community centre at 930 Pandora can be found [here](#).
- The need for green space and the ongoing use of RAP. These objectives would fall within a Parks and Open Spaces Master Plan and under the guidance of Parks staff. However, there has again been a lack of clarity on how and when the community could participate in a discussion of the future of RAP and where new green space could be created. The NPNA also feels that a discussion of park access requires an equity lens and the participation of EDI staff.
- Residents often asked about the future of Crystal Pool throughout the process, which, to our understanding, has been put on pause and Council will not be considering its future for some time, and not in the context of the local area plan. Crystal Pool and Central Park would seem to fall into the Facilities Master Plan and the Parks and Open Spaces Master Plan, but we suggest that the future of both be considered through a larger planning process that includes the local community and considers the importance of local benefits and access.

Sincerely,

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