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From: JM [REDACTED]
Sent: Friday, July 8, 2022 12:54 PM
To: Public Hearings; Victoria Mayor and Council
Cc: [REDACTED]
Subject: Public Hearing, Council re: Villages and Corridors Local Area Plans - Hillside-Quadra
Attachments: PH V&C Local Area Plans - Hillside Quadra NAC 22 07 08 letter.pdf; Hillside Quadra NAC Response to Villages and Corridors Plan 22 05 17.pdf

Dear Mayor and Council and Legislative Services:

Please accept the attached two letters regarding the scheduled public hearing on the Villages and Corridors/ Local Area Plans for Hillside-Quadra, North Park and Fernwood neighbourhoods.

The first letter is a comment by the Hillside Quadra Neighbourhood Action Committee to accompany the joint letter from the three neighbourhood associations. The second letter was previously sent on May 17, 2022 in response to the release of the plan document for the May 5, 2022 meetings of Committee and Council.

Thank you
Hillside Quadra Neighbourhood Action Committee

Hillside-Quadra Neighbourhood Action Committee
901 Kings Avenue
Victoria, BC

Mayor and Council
City of Victoria
1 Centennial Square
Victoria, BC
Via email: mayorandcouncil@victoria.ca

July 8, 2022

Re: Hillside-Quadra Plan Revisions - Villages and Corridors Local Area Plans; 950 Kings Road

Dear Mayor and Council:

The intent of this letter is to address specific concerns in the Hillside-Quadra Villages and Corridors Local Area Plan which were not raised in the July 8, 2022 letter sent collectively from the Hillside-Quadra Neighbourhood Action Committee, the North Park Neighbourhood Association and the Fernwood Community Association Land Use Committee. The collective letter expanded on two main problems which are contrary to the public interest. First, the process of gathering and involving residents was confused by pandemic restrictions (including homeless camps) and complicated by the digital divide where many people could not participate online. Second, the scope of the plan was stated to be open to inclusion at first and yet closed to many topics of discussion in reality. Although the 1996 Hillside Quadra Neighbourhood Plan was limited as a policy document (not adopted as a bylaw), residents who were involved in that process indicated recently that it was more inclusive, participatory and wider in scope than the 2020-22 process (land use changes only to amend the OCP bylaw).

In our letter to Council dated May 17, 2022 in response to Spring 2022 version of the Villages and Corridors Plan, presented to Council on May 5, 2022, we raised concerns about the additions to the plan which were made after consultation had ended. Newly created or amended land use designations were added and higher density land uses were added in locations not discussed publicly during the plan process.

The designations proposed for three publicly-owned properties are most concerning because of a shared vague overlay of the “Special Planning Area.” The three properties are:

- 950 Kings Road (1.43 ha, 3.52 ac) - former Blanshard Elementary School,
- 901 Kings Road (0.12 ha, 0.31 ac) – Quadra Village Community Centre, and
- 2501 Blanshard Street (3.16 ha, 7.81 ac) – Evergreen Terrace BC Housing residences.

The designation states: *An underlying Urban Place Designation **may provide** general guidance for the envisioned scale and character **but does not constrain potential** for other uses, densities, or built forms which should be established through additional planning and engagement.* Although all three properties have an urban residential designation and the Evergreen and Community Centre sites have the additional *housing opportunity* designation, the *special* designation leaves these important publicly-owned sites open to any use and density based on an undefined planning process.

Neighbourhood residents have repeatedly come together to say that green open space and amenities are badly needed to replace the remaining half of the former multi-functional elementary school site at 950 Kings. The Hillside Quadra Equity Analysis (Level Up, 2021) backed up the need to equitably determine what community facilities need to be a priority so the community thrive. If the base density is increased through the unknown process, the policies such as the Inclusionary Housing and Community Amenity Policy may not apply. The 2017 Vicotira Engagement Framework states that a minimum IAP2 level be “involve” for neighbourhood plans. Instead

of uncertainty, the neighbourhood needs a plan to provide clear guidance to address equity from a platform of a low base density with a defined participatory process. Please do not approve the Hillside Quadra Local Area Plan (Villages and Corridors) until there is well-defined community-based direction for 950 Kings and adjacent sites.

Yours sincerely,

Hillside-Quadra Neighbourhood Action Committee

Cc: North Park Neighbourhood Association
Fernwood Community Association Land Use Committee

Hillside Quadra Neighbourhood Action Committee Response to Villages and Corridors Plan

To Mayor and Council,

We are writing to give our feedback on the Villages and Corridors Plans (local area plans) dated Spring 2022 and made public for the May 5, 2022, Committee of the Whole meeting. These comments are specific to the proposed 2022 Hillside Quadra local area plan. Some of this feedback has been given to the staff working on the project previously, but many of the following concerns result from the **red print** additions to the plan after public engagement ended.

There are four main concerns discussed below:

- The scope of the plan and public engagement process. The messaging regarding the scope changed, which confused participants about how to be involved and on which issues they could comment.
- How the Official Community Plan (OCP) Bylaw will be amended.
- The lack of a fair process regarding the significant **red print** additions to the plan.
- Implications of new plan designations for future public processes.

Local Area Plan Scope Changes

In addition to the on-again off-again onset of public engagement set for March 2020, coincident with the COVID-19 pandemic, the scope of topics to be included in Villages and Corridors local area plan (LAP) discussion were unclear. Many participants pointed to the last plan of 1996 and asked if topics such as traffic calming, social planning, community facilities and heritage would be included in this plan. Unlike local governments like Saanich, LAPs do not amend the Victoria OCP, but some OCP amendments would follow this process, unspecified beyond guidelines (a focus group discussion).

The first message to the neighbours was that the OCP designated village areas and main road “corridors” (400m from main streets) was the main focus and that scope extended for green/open spaces and possibly other topics. Explicitly the “traditional neighbourhood” designated areas would not be discussed; the Missing Middle pertaining to this designation was a separate engagement process neighbours were to seek out. There was little discussion of the implications of the 400m main street intensification corridor, particularly pertaining to streets such as Finlayson, Cook and Bay.

Other ad hoc discussions took place online with small groups due to COVID restrictions. Side discussions influenced plan outcomes and warranted some mention in a survey, but there was no broader discussion.

The Spring 2022 version of the plan included several topics outside the original scope without an LAP-related discussion. The largest addition was Missing Middle policy, intended to replace the “traditional residential” designation. The red print additions are further discussed below.

OCP Bylaw Amendments

The Official Community Plan (OCP) Bylaw will be amended with details from the new plans and guidelines resulting from this process. Many local governments in BC amend OCPs with whole LAPs as appendices (e.g. Saanich). It was unclear to participants in the process which parts of the plan would become part of the bylaw and which parts would be considered as a kind of second tier or referral policy document.

Development Permit design guidelines were noted to be an OCP amendment with area-specific guidelines. The discussion was limited to focus groups online, although design related criticisms of visioning drawings were raised in general discussion. Missing middle design guidelines were not raised. The importance of staff review using guidelines will be significant when use and density changes occur for the non-public Development Permit process and developments exempt from public hearings. Residents are wondering if there will be any opportunity for public review of changes to use and density. Residents are asking for in-person engagement on plan details, particularly because further planning opportunities may not be revisited for another 25 years.

Spring 2022 Red Print Additions

Red print additions to the plan are significant and the loss of a reasonable opportunity for public involvement regarding these additions is not only counter to city engagement policy, but denies the basic promise of residents as actors in the future of their neighbourhoods. Some of the newly designated sites are at locations where previous applications have requested more development potential.

The following sites are new use or density additions to the plan without specific public discussion.

- **Missing Middle** policy replacing the “traditional residential” designation. Noted above, the addition of new uses and densities multiple units up to small apartment ‘six plexes’ without public process or public hearing.
- An Urban Residential designation on both sides of **Blackwood St.** on the north side of **Topaz Ave.** This ‘spot’ designation lies in the centre of the traditional residential/missing middle area and means mid-rise apartments of up to a density of 2.5 FSR, multiple times the surrounding density, could be constructed without a public hearing if a non-profit development.
- A new small village centre at **Finlayson and Highview.** Commercial-residential higher density development at this corner is a new addition to the plan with impacts to residents on a dead end street.
- **Evergreen Terrace** (2501 Blanshard, BC Housing complex) “special planning area.” A density up to 2.5 FSR. This density is five times the existing density. A BC Housing public

process is underway, but this is a very large leeway for a site where proposed LAP development principles have not been part of engagement.

- **950 Kings** “special planning area” designation. The density is uncertain. Although policy regarding future planning is included, this requires more consultation for a very contentious neighbourhood site.

Other new additions to the Hillside Quadra LAP need mention. After almost no discussion of history or heritage in the planning process, significant text additions were added. There is a need for a public discussion of neighbourhood heritage and the role of heritage design guidelines in new development.

The current Evergreen Terrace site was a 1960s-70s urban renewal project which ignored architectural heritage and involved expropriation, forced evictions and the breakup of ethnic communities. There needs to be recognition of the legacy of this project and the long time it took to make this a healthier community with the important role of the community centre.

Mixed residential areas, particularly along Fifth Street (between Hillside and Quadra Elementary School) and Finlayson Avenue urban and mixed residential designations have not been discussed in a public forum with regard to density increases up to 1.6 FSR and beyond. Some dialogue regarding density increases on Fifth have received mixed feedback and warrants more involvement.

Implications for Future Public Processes

The combination of changes to city zoning procedures re: rapid deployment of affordable housing and the missing middle large scale rezoning (up to 65% of the city land base) mean a substantial decrease in public process. The ability of residents to have a say on how adjacent development use, density and design affect their interests will be decreased to only a few sites. This is a large impact on our democratic process and citizen involvement in evolution and ownership of our city. It looks like much future development will be delegated to staff reviewed development permits in a process that has no public access and little Council oversight. Many in the community are not comfortable with what seems like a lack of checks and balances to ensuring we create livable places.

Traffic, Parks, and other concerns

Hillside Quadra is bounded by many arterials. Traffic safety issues are a longstanding concern throughout the area and this process had no means to address this issue. We have advocated for years for cut through traffic mitigation. We were told years ago that these would be addressed when we did our local area plan. It is very frustrating that when it came time to do a LAP it was restricted to Villages and Corridors. Issues around parks and greenspace could only be addressed in a very general way. There are too many parallel processes and citizens are not sure how to proceed.

Certainly, there are good aspects to the proposed plan, but given the impact of the COVID pandemic on the process, the lack of discussion on substantive issues, the context of regulatory change and last minute substantive changes to use and density, more time is needed for the community to understand and digest the implications. Please reconsider the rapid approval of the Village and Corridor plans that will affect residents for years to come and give us more time for meaningful in-person participation in fall-winter 2022-2023.

Thank you,

Hillside Quadra Neighbourhood Action Committee