



In this response letter, the Fernwood Community Association Land Use Committee (LUC) Missing Middle Initiative (MMI) Working Group wishes to acknowledge the housing crisis in Victoria and the need for continued support for diverse and truly affordable housing options throughout the city in general and Fernwood in particular.

Although the Working Group recognizes that the principle of increased urban density to bolster home ownership has some merit, our concerns about the MMI focus on issues with the cumulative potential to negatively impact and damage Fernwood's affordability, green space and character — features that attract diverse populations who seek out Fernwood's unique qualities.

While the MMI states that affordable housing will be addressed by other initiatives, affordable housing is at the heart of the city's housing crisis. Private developers will be able to act quickly upon blanket rezoning, but government-led affordable housing initiatives cannot move as fast, even with the City's new legislation. The recently released Fernwood Neighbourhood Plan identifies areas for affordable housing developments. However, Council has not disclosed any strategies to prevent these areas from being bought by developers thereby increasing land values and further limiting the financial feasibility of truly affordable housing.

With two-thirds of the Fernwood community relying on rental housing, the Working Group is particularly concerned about tenant displacement. Older housing that currently provides affordable rent for long-term, low-income tenants will be disproportionately affected by the MMI. Further, displaced tenants are not protected by existing relocation support found in the Tenant Assistance Policy (TAP). Given the dearth of available affordable rentals, tenants need protections. Should the MMI be approved displaced rental housing tenants require comparable replacement housing at a comparable price, with tenant right of first refusal to return to the premises based on rents paid prior to redevelopment.

The city's commitment to affordable rentals, the preservation of existing rental stock and protecting tenants is outlined in the Victoria Housing Strategy.<sup>1</sup> The first two of the Housing Strategy's goals are: 1) Prioritize renters and renter households; and 2) Increase the supply of housing for low to moderate income households in Victoria. In contrast, the MMI contradicts the goals and statements of the Housing Strategy. On housing supply, page 12 of the Housing Strategy states:

*At this moment in Victoria, we don't need more housing that is out of reach of the average income earner... Victorians need affordable, accessible, attainable housing that people in all ages and stages can afford...(a)nd we need to take care of the supply we already have by making sure it's safe and secure, and that tenants are protected from hazardous living situations or precarious housing.*

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<sup>1</sup>[https://www.victoria.ca/assets/Departments/Planning~Development/Community~Planning/Housing~Strategy/The%20Victoria%20Housing%20Strategy\\_Phase%20Two\\_FINAL%20Web.pdf](https://www.victoria.ca/assets/Departments/Planning~Development/Community~Planning/Housing~Strategy/The%20Victoria%20Housing%20Strategy_Phase%20Two_FINAL%20Web.pdf)



Because Fernwood has such a high number of affordable rental units, the neighbourhood should be a protected zone for the construction of co-op housing and affordable housing as the first wave of coordinated measures to address the housing crisis. When the potential of these initiatives is maximized, the MMI can then be addressed. A coordinated strategic plan to address housing does not mean that each initiative is simultaneously deployed. Rather, it recognizes that the premature deployment of the MMI is likely to undermine and compete against other initiatives such as affordable housing. The MMI will diminish existing affordable housing as it contributes to rising housing and land values. Timing is paramount.

Timing also plays a role in how communities respond and adapt to change. With the MMI effectively pre-zoning for a wide spectrum of housing, the community no longer has a chance to express their opinions about these developments or mentally prepare for the changes they bring. This flies in the face of change management principles. and disrespects neighbours, who deserve to be informed, heard and given time to adjust to changes as well as challenge plans that violate guidelines or fail to adhere to optimal designs.

MMI would “delegate approvals to staff for houseplexes and townhouses – the same way they are currently delegated for single family homes – as long as the proposed new homes fit within design guidelines that ensure compatibility with neighbourhood character.”<sup>2</sup> But Council has no regulations to enforce compatibility or aesthetics, instead relying on guidelines that developers can ignore, leaving residents with no recourse. Without a mechanism that gives community and neighbours a say in the approval process of factors like new building facades created under the MMI, this policy and its application citywide has the potential to nullify the unique nature of individual neighbourhoods.

Another consideration not adequately addressed in the MMI is the removal of important mature trees and green space. The mature urban forest is desperately needed to mitigate the extreme heat events outlined in the Community Climate Risk and Vulnerability Summary Report. The MMI’s proposed design guidelines allocate only 6.5% permeable green space per lot. While that green space may be private (e.g., someone’s backyard), it nonetheless contributes to cooling and appropriate water management. This loss is cumulative: the more green space removed from private dwellings, the hotter the neighbourhood gets.

This is particularly concerning in a community like Fernwood, where recent heat mapping conducted by CBC shows that the geographical area associated with Fernwood postal codes V8R, V8T, and V8V have 50%, 94%. and 87% less vegetation than other neighbourhoods in the metropolitan area.<sup>3</sup> Stricter requirements are needed in the MMI to promote development that

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<sup>2</sup> <https://lisahelpsvictoria.ca/2022/05/15/victorias-big-housing-moves-building-the-future-we-need/>

<sup>3</sup> <https://ici.radio-canada.ca/info/2022/07/ilots-chaleur-villes-inegalites-injustice-changements-climatiques/en>



protects mature trees based on canopy coverage, health, and resilience, even when those trees exist within the footprint of a proposed building.

Finally, we ask that Council consider the impact of increased urban density on the City's school system. George Jay Elementary School became overcrowded just a few years after Blanshard Elementary closed. The loss of capacity for students as well as green space at the former Blanshard Elementary represents a significant setback in our community's capacity to accommodate a population increase. George Jay students have lost a portion of their school grounds to accommodate an annex as a result of overcrowding, and green space in the adjacent Queens Park has been used for a daycare. Central Middle School also has an annex on former green space to accommodate overflow

As elected officials the Mayor and City Council are responsible for planning for the future needs of Victoria — including public services such as the City's school system, socioeconomic concerns, climate adaptation planning, homelessness, parks, transportation and housing. What role will elected councillors play when specific questions arise about land use? When a development permit is issued by department staff and community members or neighbours want to object or to point out some unconsidered factors, what recourse will there be?

The Fernwood LUC MMI Working Group respectfully asks that Victoria City Council send the MMI proposal back to staff so the policy can be worked into a coordinated strategic housing response that prioritizes affordable rentals ahead of home ownership, includes provisions for renter protections, allows for community feedback, fully considers the implications of densification on already overcrowded schools and takes seriously the need to protect mature trees as part of climate action in the urban development context.

Thank you,

Fernwood Community Association Land Use Committee Missing Middle Initiative Working Group.  
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