

North Jubilee
Neighbourhood
Association

1766 Haultain Street
Victoria, BC V8R 2L2
September 9, 2022

Mayor Lisa Helps and Victoria City Councillors
1 Centennial Square
Victoria, BC V8W 1P6

Re: Amica Jubilee House, Phase 2—1921, 1929, 1931, 1933, and 1935 Ashgrove Street

Dear Mayor Helps and Victoria City Councillors,

Please regard this letter as North Jubilee Neighbourhood Association (NJNA) Land Use Committee's opposition to the Amica Jubilee House Phase 2 development: the proposed 88-unit private seniors' living facility to be developed on Ashgrove Street. This letter and appendix provide concerns, comments, and questions from NJNA and area residents, in support of this stance.

We believe the proposed development displaces tenants in affordable housing and further compounds the Victoria rental crisis.

Background

On July 19, 2022, we hosted a virtual Community Association Land Use Committee (CALUC) meeting for the Amica Jubilee House development proposal Phase 2. The meeting was attended by representatives of Milliken Developments (Kate Milliken Binns, Don Milliken, James Milliken, architect Charles Kierulf, landscape architect Sean Leogreen) and 21 area residents. Pat May chaired the meeting, and Wilma Peters took notes.

Milliken Developments provided details of their Phase 2 proposal for Ashgrove Street: an 88-unit private seniors' living facility managed by Amica Senior Living. The proposed six-storey building will join Phase 1, currently being built on the corner of Fort and Richmond (1900, 1908, and 1912 Richmond Road; REZ 00651; and DVP 00531), and expand residential care in a transition from independent to full-time care. Charles Kierulf discussed the interior layout and plans for parking and the driveway; Sean Leogreen discussed plans for exterior landscaping.

Milliken Developments says it is proposing Amica Jubilee House Phase 2 to provide care for clients at all stages of life to create a continuum of care, but as one resident commented, "our community will be broken to establish your community—a less cohesive neighbourhood."

Below is a summary of the main concerns from those in attendance; the appendix provides further detailed concerns and notes taken during the meeting.

Summary of concerns

- **Loss of affordable housing:** Ejection of existing tenants from affordable-housing units is arguably the most significant drawback to this proposal. Several residents felt the developer showed little regard for the community—intending to dispose of four multi-unit homes currently housing tenants in affordable units, rather than making use of the already-vacant and dilapidated Turner building located close by.
- **Too-large building scale and height:** Many residents voiced concern over the scale and height of the building, which comprises three zoning sites. Ashgrove Street is predominated by R1-B zoning, which limits building height to a maximum 2 to 2.5 storeys. Directly adjacent and opposite the proposed six-storey site are multi-family dwellings of 2 to 2.5 storeys.

Within the proposed site map, two other zones exist: R3-B and C1-R (Phase 1 zone). The builder contends that the mixture of these three zones (urban residential) allows for a maximum build-height of up to six storeys. However, according to the definition of zone R3-B, six storeys is only achievable with a site coverage at or under 30 percent, while C1-R allows only a maximum of five storeys. Neither of these criteria are being met by this proposal.

- **No land-use transitions:** Residents living directly adjacent to the project, across the street on Ashgrove, and on Chestnut all expressed concern over the impact that the six-storey height, increased noise (ambulances, machinery, traffic), shadowing, and lack of privacy will have on their 2 to 2.5 storey homes.

City planning in the Jubilee Strategic Directions states: improve land use transitions between general employment (Royal Jubilee Hospital [RJH]) and adjacent ground-oriented residential areas. This criterion is not being met by this proposal. Further, this proposal does not fit in with the spirit and content of the Jubilee Neighbourhood Plan.

- **Detriment to social welfare:** Some residents mentioned the amenity contribution made to the City in Phase 1 of this project. The \$1.0 million contribution, which allowed the developer to increase FSR and site-coverage ratios, has no visible positive outcomes for the residents of North Jubilee, who will feel the effects of increased traffic, noise, and other related neighbourhood social-welfare issues (e.g., further erosion of healthcare services).

In addition, tenants spoke of the emotional toll of living under the constant threat of eviction. They expressed their enjoyment of the community, the affordability of their current suites, and their access to greenspace in the yards of their homes.

- **Noise:** Mechanical noise is always a concern in this area due to the office building on Richmond Road and RJH. We heard no details about what steps are proposed in Phase 2 to mitigate noise.

With 135 units in Phase 1 of the luxury seniors' housing nearing completion, North Jubilee does not need 88 more units built on a residential street, while multi-family homes are destroyed and tenants are displaced.

For-profit, luxury, seniors' housing is not in short supply in Victoria; however, affordable housing, such as non-profit or government-funded seniors' housing, is desperately needed. For these seniors-in-need, wait lists are long, and the demand is high and growing. We saw COVID-19 lay bare the urgent need for better government funding for seniors' care. All levels of government should make a commitment to increase affordable seniors' services, including at the civic level.

This project is meant to attract wealthy, aging retirees from all over Canada to the corner of Fort and Richmond, further increasing the strain on our over-burdened healthcare sector. Working-class North Jubilee residents will gain no societal benefit or amenity in return. That is why we do not support this Phase 2 proposal.

Sincerely,

North Jubilee Neighbourhood Assoc. LUC

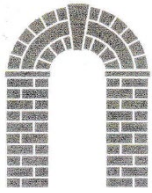
CC:

Chelsea Medd, City of Victoria Planning

James Milliken

Isobel Mackenzie, BC Seniors' Advocate

South Jubilee Neighbourhood Association



Appendix: Further details—concerns, questions, and comments

Further concerns from the North Jubilee Neighbourhood Association Land Use Committee

1. Our community lacks a community hub where neighbours socialize, share a cup of coffee, etc. We are concerned this application does not move forward any vision of a vibrant urban village that would enable us to gain community spirit. On the other hand, we could lose many valuable neighbours from a well-established neighbourhood street—a double loss.
2. We understand that an expanded Phase 1 traffic study led to a potential time-restricted left turn from Fort Street to Ashgrove. The NJNA would ask that this change be presented to the neighbourhood for discussion.
3. It would assist the NJNA Land Use Committee if we could be provided with a full set of plans, including landscape plans. Of particular concern:
 - North side balconies—removal of planned balconies on the North side of the proposed building would provide some privacy for the home next door.
 - Robust landscaping—we understand that “robust” landscaping is planned for this area and would appreciate more details. Use of mature trees for planting eliminates a “wait and see how it grows” approach.
 - Privacy fencing—we would like more details on any privacy fencing considered.

Questions and comments from participants at the meeting

- What amount of soil stabilization/drilling is envisioned to prepare the deep ground for building?

Response: Developer replied that geotechnical study will be done, but they anticipate the same conditions as Phase 1.

- Was this the plan all along to build this development when Phase 1 was put forward?

Response: “No.” There was traffic study done and the City is looking further into this. There will be a wider sidewalk and boulevard. Residential access for vehicles will be from Birch Street.

- Could you not have some of these units affordable?

Response: Unlikely.

- Could Milliken Developments contact the City and enquire as to where the \$1.0 million contribution from Phase 1 was directed? We are hoping it would be for seniors' affordable housing.
- Six storeys is too high with an increase of 100-plus people. This development is in the wrong place. There is excellent access in the neighbourhood for lower-income people, walkable to stores, coffee shops, bus routes, etc.
- Re: 1941 Ashgrove—This property is directly impacted as it will be adjacent to this building. Our sense of community will be lost. Four multi-family homes will be displaced. This is a small residential street. Local garden plots will not survive the shadowing. Are the balconies going to look into my yard and windows? Where are the people going to come from to live in this development? Not our neighbours.
- This is a crisis for renters. Where will they find affordable housing? Currently there are four older homes with lower rent, and with vacancy rates so low where will they go? With so many people moving into this development, where are they going to find doctors?
- Questions to the architect re: current zoning: Traditional residential or urban residential? Both sides of Ashgrove Street zoned the same? Urban residential supports six storeys.
- Loading and deliveries will have access on Ashgrove. Residential access on Birch. Drop-off and visitor would access through Ashgrove.
- Access to Ashgrove is right turn only. Left turn off Fort? This would be a huge issue and has to be followed. North side of building has no windows?

Response: Only bedroom windows and the staircase, which would have motion-activated lights.

- Could you please tell the finished height of both buildings?

Follow-up: Charles Milliken will get back to NJNA Land Use Committee with a reply.

- Could the shadow study be done for 7:00 and 8:00 a.m.?

Follow-up: Developer will do this and get back to NJNA Land Use Committee.

- What else would the underground be used for?

Response: Storage, maintenance, etc., and parking.

- Re: urban residential zoning: What is the density?

Response: Phase 1 will be 2.6 and Phase 2, 2.4, so for both properties, it would be 2.57.

- Concerns expressed about garden plot with shadowing of building.

Why would you not use the Turner property on Richmond?

Response: [No reply from Milliken Developments]

We are losing residential housing. People moving into this development will not be from our neighbourhood.

- Resident lives in her great-grandma's home. Maximum height should be four storeys in our neighbourhood. Could you delay Phase 2 to see the impact Phase 1 is going to have? Will Milliken Developments compensate homeowners for lack of gardens? Properties needed for this development are under contract, but not purchased.
- I hope tenants will be compensated and helped to find a new home. The time frame for this development is approximately 1.5 to 2 years. This is a very stressful situation for eviction of renters.
- There is not enough parking or amenities. Access is only off Ashgrove Street, which is hard to navigate. People in the neighbourhood would not be able to afford this. Could you tell us the cost of living there?

Response: Discussion followed over this, without agreement, and the ranges of costs were questioned. Residents expressed their concern that the value of surrounding properties would be lowered.

- The official community plan contemplates urban residential for up to six storeys. The residential character of the neighbourhood would be lost with this development. Houses to the north and across the street will be deeply impacted. Maybe property should be four storeys instead of six. What is the advantage of you coming to our neighbourhood?

Response: Common areas of building could be open to public. Groups would be able to access indoor space for meetings, clubs, etc. [Note: while this was suggested, it would not be a given.]

- Phase 1 contributed \$1.0 million to the City of Victoria. This money was put into a fund for affordable housing, but it could not be determined if this was for seniors. Would Phase 2 also be contributing? [This is probably a given.]
- Will ambulance and fire-truck noise increase? Wayne, who worked for BC Ambulance for 30 years, addressed concerns. This is a common complaint in our area. As we live near the hospital, it is unavoidable. There will definitely be more noise as both of these buildings will house an old population.