

24<sup>th</sup> October 2015

Mayor and City Council:

My concerns with the proposed 5 storey 66' high development proposed at 220 Cook St are:

- noise
- air quality
- visual quality
- effect on wildlife and trees and interconnected underground root systems which stabilize and aerate blue clay soil
- impact on current use of Cook St Village, Beacon Hill Park and Dallas Road
- overall magnitude of the development – height, site coverage etc and fit within transition block between Cook St Village and Beacon Hill Park
- change in land use.

This development proposal acts as a focal point for many issues the OCP guidelines raise, and the confusion local residents have in knowing how they can respond. At Figure 9A OCP, "Conceptual Illustrations" from "Guidelines for Complete Town Centres and Urban Villages" depicts in 6 frames – 3 street views, and 3 overviews, tall, taller, and tallest buildings; slender young trees like lollipops placed curbside; roads intersecting at 90 degrees; and tall buildings behind tall buildings. There are no detached family homes / townhomes / duplexes / rowhouses, no individual gardens behind or in front. There is no contained area encompassing both sides of the street, no coffee shops with tables outside where people sit, no view down side streets of cherry trees and heritage houses and front gardens, no glimpses of park, no mature trees forming a continuous canopy overhead. The summary table at p.39 OCP describes "built form", "place character features", "uses" and "density", and "low-rise and mid-rise multi-unit buildings including row houses and apartments", and "central public green space or square" are the attributes in the town planning slot selected for Cook St Village.

It's a model, and all models have to be tailored to fit circumstances. Though adopted by the City, the guidelines were to be informed by Local Area Plans, with veto power remaining with City Council. A session with City Planners at Fairfield Gonzales Community Association was promoted as community engagement on process to develop Local Area Plans, but it became clear City Planners were only open to a Local Area Plan which supports the OCP as they interpret it. A Friday meeting in Cook St Village with Mayor Helps emphasised the importance of Local Area Plans and suggests amendment to the OCP could result. It's important people are made aware of this, and understand why zoning is in issue: the December 2014 "CALUC" meeting didn't explain but proceeded as if this application was a done deal between the developer and city planners, with no place for local residents' opinions, and this is reflected in the minutes of that meeting forwarded to City Council which lists quibbles rather than substantive objections. The process is flawed in that it's premature to approve rezoning without assessing the sociological, environmental and economic consequences of this development.

Urban Core Developments describe their building as "mixed use" because it combines residential with commercial development. The proposed condos, all being very small, fall within Victoria's designation of "affordable" because they're small, but they're designed for one person (or a couple living together) who can pay market rent/price, not families. The building is built with one kind of occupant in mind, 60 such, and is less flexible than the average hotel: it doesn't increase the number of multifamily homes, for which those

lots are currently zoned, nor does it blend with homes and apartments adjacent to it. It extends the commercial zone of the Village to within a block of the Park, so that there is no longer a transition zone to reduce urban encroachment on park land, and it prioritizes people projected to come in the future over people already here and currently using local schools, day cares, medical clinics and other amenities. Rezoning lots currently zoned for multi-family homes to permit small condos suited to single people and commercial space for businesses doesn't "densify" current use – it changes it.

As well, a building twice the height of the buildings around it is a change of considerable magnitude. Measuring from a 3<sup>rd</sup> floor apartment window in the 4 storey building adjacent to the proposed development, the ground is only 19'6" below; and it's 29' below a 4<sup>th</sup> floor apartment window. The developer's architects claimed at a PR event in the summer that at 66', the new building will be 11' taller than the adjacent (4 floor) building, but this seems unlikely.

I ask that City Council consider:

1. Height: Pictures show a building higher than lampposts, poles carrying wires, and the tops of mature chestnut trees. Existing buildings are lower. The proposed building is twice the height of the recently built Castagna development in Cook St.
2. Foundations are deeper by one storey, and will cover the whole 4 lots with reinforced concrete.
3. This in turn means access from adjacent land: the current proposal is to convert the (unpaved) back lane into a roadway for commercial vehicle access and deliveries, which would permanently increase noise and other pollution.
4. Soot takes time to form from organic pollutants from exhaust, but there will be an immediate impact on air quality from the proposed parking area for 50+ vehicles below ground and 20+, including commercial vehicles, above ground.
5. Monoplanting of chestnut trees on either side of Cook from Southgate to Dallas maintains a continuous canopy of trees which sets a strong directional sightline and slows traffic driving beneath it. The roads which join Cook south of Fairfield are all staggered so that there are no cross roads, only cross walks, linking both sides of the street and maintaining the tree canopy. Side streets are planted with different varieties of cherry / plum trees and cafe tables and chairs allow people to sit and enjoy them. In addition to the carbon they store, air pollution they remove, rainwater they hold (allowing re-evaporation by the sun) and air they circulate, the trees reduce the need for air conditioning on hot summer days and modify wind and wind-chill in the Village. The trees create mass and height and perspective, landscaping suggestive of a semi-rural rather than urban location. Building taller than the treetops will transform the look from village / coffee shops beneath trees to an urban building skyline, and while that's consistent with the illustrations at Figure 9A in the OCP, it's not how Cook St Village looks at present, and will be transformative.
6. Trees increase soil stability and their interconnected tree roots aerate it, and underpin a below ground biology that's important in blue clay soil. Forestry roads are required to be decommissioned by tree farms because their foundations prevent interconnection and thereby cause land erosion. Set backs and gardens have above ground value and impact, and below ground value and impact too: and soil can only be loaded to the extent technical studies establish.
7. There are no pictures showing views E-W or the back of the building. Currently the space at the back isn't other tall buildings, but is open informal back garden space with trees and birds, hedges, fruit trees, veg gardens, flowers, cats and dogs and children and adults and trampolines and so on, bisected by a lane; it's a bright sunny space which is quiet, with good air quality, and it's used by nesting birds in spring and summer.

8. There are no pictures showing the extent to which treetops on high ground in Beacon Hill Park, or the bald eagles which nest in them, will remain visible, or whether the existing treeline will be replaced by a building skyline.
9. There are no pictures to show how development will look in relation to current Fairfield Farm and Oliphant St heritage homes, and there is no projection to show how a corridor of buildings would impact the neighbourhood visually.
10. Beacon Hill Park encloses ancient and historically important areas, and is held in perpetuity as a park land. In designing it for use as a public space in the last century, John Blair used shape and colour of trees and shrubs to create perspective and interest and enhance the natural features of the terrain. It includes a lookout with stunning views - over water, coastlines and the City. A century later, the mature 74 hectare park with distinct areas including garry oak meadows, camas and other wildflowers, bald eagle and blue heron nesting sites, needs protection from urban encroachment. The chestnut trees along Cook St are part of the park design, and houses and low rise apartment buildings are consistent in size and design and construction materials so that they blend beneath rather than dominate.
11. Noise, air quality and visual quality: there are a dozen or more coffee shops and restaurants and a pub with outside tables in Cook St Village, and it has become a destination dependent on low (conversation level) noise, good air quality, and visual quality – which are rural rather than urban qualities. There has been no assessment of the economic impact change will have: rather, the assumption that redevelopment is an economic benefit is an assumption of the planning model.
12. Ambient noise measured 29-30DbA in June during the day-time at 1050 Park Blvd, adjacent to the proposed development site and overlooking the back. That's below conversation level, which is the level by-laws permit in areas designated residential. Rezoning the area for commercial use and rebuilding the back lane as a service road for commercial vehicles will impact all the homes of the square it backs on to. Early morning or late evening deliveries / garbage collection / refrigerated trucks, motor vehicle traffic, not being able to leave windows open or sit in quiet outside on a balcony or patio, not being able to hear birdsong, and interrupted sleep, are frequent complaints in homes adjacent to commercial buildings and will have health effects on many lives. The existing buildings are in good condition so would be likely to remain, absent plans to redevelop.
13. Process: giving a “custom permit” to a developer carves out a special environment for the developer who is then no longer bound by the same zoning and by-laws as his neighbours. The developer's constituency is his shareholder(s), not neighbours or neighbourhood. So it's important to quantify the downside of giving a permit for this development before giving approval, and that was particularly lacking at the last CALUC meeting. The lots shouldn't be rezoned unless it's clear that the site should no longer be zoned for low-rise multifamily homes; and City council has the task of considering urban encroachment in this block next to the park.

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