



www.CamosunCommunityAssociation.com

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October 22, 2016

Mayor and Council
District of Saanich
770 Vernon Avenue
Victoria, B.C. V8X 2W7

Dear Mayor and Council:

**Re: Rezoning and Development Permit application – 1780 Townley Street
October 24, 2016 Committee of the Whole Meeting**

The *Camosun Community Association* (CCA) has reviewed the above rezoning application, the associated Saanich Planning staff report dated October 6, 2016, and considered the extensive input from and discussion with many neighbours adjacent to the proposed redevelopment. At our October 13, 2016 meeting the CCA Board passed a motion unanimously to ***“not support the Greater Victoria Housing Society’s rezoning and development permit application in its current form”***.

We recognize the critical issue of affordability in our neighbourhood, Saanich municipality and across the Capital Region. We also acknowledge the important goals and commitment of the Greater Victoria Housing Society (GVHS) and its partners to expand much needed rental housing stock in the Capital Region. However, the Association feels that the GVHS proposal is not in scale with the adjacent neighbourhood nor is it in keeping with the *Shelbourne Local Area Plan* (SLAP), much less the needs of surrounding residents who also contribute to the housing stock in many innovative ways

While there are many positive aspects to the GVHS’s proposal, we feel that a more modest project is more suitable for Townley. In addition, Saanich Planning should be convening a more extensive and pro-active dialogue to revise the SLAP before future projects of this scale are considered.

Principal concerns include the following:

1. Inconsistency with *Shelbourne Local Area Plan*.

The relevant policies in the SLAP that should guide multi-family development on local streets include:

- 6.1 Protect and maintain the stability and character of Shelbourne [Local Area] by maintaining single family dwellings as the predominant land use.
- 6.5 Ensure redevelopment of existing multi-family developments is compatible with adjacent land use when considering development permit applications.
- 6.6 Require multi-family developments to provide adequate private open space amenity areas on-site.
- 10.3 Require that [institutional] site design, building scale, and landscaping respect neighbourhood character and the natural environment.

Accordingly, the height, density and lot coverage would be appropriate along a major corridor (e.g., Shelbourne), or within a Major/Village Centre but a 4-story “landmark” building is clearly out of context on a residential street. Policy 4.2.4.2 of Saanich’s *Official Community Plan* also indicates that “...zoning applications for multiple family developments [will be evaluated] on the basis of neighbourhood context, site size, scale, density, parking capacity and availability, underground service capacity, adequacy of parkland and visual and traffic impacts”.

2. Suitability of the proposed RM-6 zone.

The RM-6 zone is typically located along major corridors such as Shelbourne, Tillicum, and Quadra Streets. To our knowledge the RM-6 zone has not been applied on residential streets like Townley. Moreover, the request for significant variances to the RM-6 zone (particularly height and set-backs) further reinforces that the proposal is not suitable for a residential street. The zoning should respect and enhance the existing character of residential areas.

3. Height and transition principles.

As mentioned above, the proposed building height requires a significant variance to the RM-6 zone. Good urban design principles should provide for an adequate transition from 4 stories to the adjacent 1.5 to 2 story single family residential. Saanich’s own planning department have been espousing the importance of “Step-Down” design principles for the past 5 years in the draft Shelbourne Valley Action Plan (see attachment 1). While we appreciate the proponent's efforts to moving the 3 story town house to the front to the property, the 2.5 metre “step-back” (about the width of a balcony) does not improve the transition in a meaningful way.

4. Site coverage and significant tree loss.

The proposed site coverage and building configuration requires that a large number of significant trees be destroyed. The destruction of these trees devalues the urban forest, habitat and visual quality for all residents and will not be replaced by the planting of replacement ornamentals. In addition, the available open space and recreation amenity areas on-site (“tot lot” planter and two benches) are not adequate for a mixed housing development of this size.

In closing, we do not support the recommendation of Saanich Planning staff and feel more work is required to address neighbourhood concerns before this project is referred to a Public Hearing. An underlying problem we see is that the *Shelbourne Local Area Plan* needs updating so as to provide some land use goals and plans that would guide and coordinate major developments such as the one now proposed by the GVHS. Without such a planning context, and not knowing for example if Richmond School and adjacent lands will continue to provide public access, Saanich Planners should be especially careful in how they now guide development through the proposed rezoning in this area of Saanich.

We appreciate your consideration and look forward to working with Saanich Planning and the Greater Victoria Housing Society to further improve this proposal.

Yours truly,



CAMOSUN COMMUNITY ASSOCIATION
Sandie Menzies, President

pc: Sharon Hvozdzanski, Director of Planning, District of Saanich
Kaye Melliship, Executive Director, Greater Victoria Housing Society

Urban Design Transitioning Principles

(from District of Saanich draft Shelbourne Valley Action Plan)



Figure 7.6 | Illustration of an Apartment Building Fronting a Major Street Transitioning to Townhouses Fronting a Residential Street