

Victoria, BC September 19, 2016,

Mayor Richard Atwell and Saanich Council

770 Vernon Avenue, Saanich, B.C. V8X 2W6

Dear Mayor and Council:

Re: TOWNLEY LODGE REZONING APPLICATION – 1780 Townley Street

The Neighbours for the Wise Development of Townley Lodge do not support the Greater Victoria Housing Society’s rezoning application of the Townley Lodge property from RM-1 to RM-6. We feel that the Townley site is not suited for such a large project. The proposal is too dense, too high and too intrusive to suit the needs and expectations of neighbours and the surrounding community.

We acknowledge the critical need for affordable housing in our neighbourhood and would enthusiastically support a project of a more modest scale—one which would allow for more persons on low income and people with disabilities to continue to live within the community with dignity and respect. However the scale of the current proposal does not relate well to its surroundings nor is it a good fit for existing tenants—a number of whom have asked us to speak on their behalf. We have described our principle concerns below and request that you carefully consider them during your review of the application:

1. INAPPROPRIATE LOCATION FOR RM-6 ZONE ON RESIDENTIAL STREET.

The RM-6 Zone requested by the GVHS provides for the highest density and highest buildings for multiple families in Saanich. **To date, only 6 locations have allowed for this dense RM-6 Zone.** Moreover, all of these zones are located along such major thoroughfares as Shelbourne, Tillicum, Tolmie and Quadra, and all have been located adjacent major shopping centres. These all feature “step-down” development, including roads separating them from any single family housing located adjacent. In the case of this rezoning proposal, **Townley is NOT a major thoroughfare**, and there is no road, much less any other form of barrier such as trees proposed which would provide for this needed height transition. If this Zoning were to be approved, it would set a major planning precedent for Saanich, for allowing big buildings to be placed next to small, and for allowing these built along a residential street such as Townley.

- 2. A “SUPER” M-6 ZONE WILL BE CREATED IF REQUESTED VARIANCES ARE APPROVED.** The problem arises not only from the choice of the RM-6 Zone which allows a 4 story height and extremely high lot coverage, and density, but by the proponent’s further request for variances which would increase building heights even further and to decrease setbacks from front and

side yards as well as between buildings- in effect creating a Super RM-6 Zone (see Tables 1 and 2 in Appendix). Variances to relax parking for both groups of tenants have also been requested, despite presence of significant traffic issues existing.

3. EXCESSIVE HEIGHT DISCREPANCY.

The 9.5 feet variance requested to increase the Apartment height to 47.2 feet would have this building tower over both our single family houses and even over many of our present trees. The proponent has used the argument that the Apartment is not much taller than the Church next door. What is overlooked is that “tall” is an accepted architectural characteristic of virtually all church buildings. Even this church, built back in the 1960’s however, recognized the need for `step-down` development so as to fit into the community: its tall section being located on Townley and its low one storey annex located next to the adjacent single family housing.

4. STEP- DOWN DESIGN PRINCIPLE NEEDED FOR APARTMENT ALSO

These “step-down” policies, designed to buffer low density development from high, have long been a policy of Saanich, recently enshrined in the Shelbourne Valley Acton Plan now being put forward by the Planners. While we acknowledge the proponent’s efforts to comply with this policy by moving their proposed 3 story townhouse to the front of the property and the 2 storey to the back, it now remains for the proponent to apply the same “step down” design principle to the proposed Apartment component. This would mean reducing this building height to 2 storeys where it abuts residences as well. The proponent’s offered solution to step back a portion of their fourth floor by 2. 5 metres cannot be construed as meaningful concession to “step-down” design.

5. TRAFFIC AND PARKING ISSUES.

Traffic and especially parking is presently an issue with the neighbours. On week days Townley is congested with traffic and parking from the School and Hospital, with parked cars, including those from Camosun College, extending around the corner from Townley to Queenston. On other days when Church services are held, the large congregation creates more traffic and parking demands. As a consequence, traffic presently is often restricted to one lane. Drivers using Townley as a short cut between Richmond and Shelbourne only add to this congestion. It can only get worse if this development proceeds and parking restrictions are not introduced on area streets. Should the estimate on parking needs prepared by proponent prove to be wrong, or if the proponent is unable to control ownership of cars in the future as proposed (or restrict such visits from friends and relatives - or service vehicles), there is no space on the property which could be used to make up for this or any other shortfall. Table 3 in the Appendix shows the generous relief from parking requested.

6. EXCESSIVELY LARGE FOOTPRINT.

The proportion of the site covered by buildings, traffic access lanes and parking areas will create such a large footprint (the impervious area proposed will cover over 50% more than what is now covered) that it is no wonder that when all the rain gardens needed to absorb this run-off are also factored in, little room is left over for preserving any semblance of green space – much less the trees which have been a long time feature of this property.

7. LOSS OF SIGNIFICANT TREES

There will be some very significant trees to be lost if this development goes ahead as proposed. The most noteworthy of these are the Scots Pines, one of which has been designated “protected status”. If this tree, and the loss of the other perimeter trees which abut the entire property, some over 50 feet in height and age, and considered landmarks for the community are to be replaced by a landmark Apartment as proposed, the devalued natural character and beauty of the neighbourhood will cause even more neighbours to move. Much has been said by the proponents about how their new replacement trees will outnumber those existing. It should be noted that these “replacement “ trees will all be “ornamentals”, designed for growing in close quarters in and around buildings. Even if allowed to grow to maturity, these will never achieve the height and grandeur of existing trees nor provide the superior habitat of the existing canopy. Moreover, we understand that no “replacement” trees will be planted in this buffer zone to replace the existing natural buffer and backdrop between neighbours.

8. TENANTS NOT HAPPY WITH PROPOSED CHANGES AND PROCESS.

Based on present demographics, future tenants of the Apartment are expected to be between the ages of 40 to 65, nearly all single, some affected by social disabilities, but all sufficiently fit to live independently. What these people have in common is lack of money, need for affordable, if not comfortable housing, and some outdoor space where they might continue to enjoy with their neighbours and friends. The high standard housing proposed and discussion of higher rents by the proponent has tenants concerned they will not be able to afford the new units, even should they be able to return (“renoviction” being a term used). The tenants are also concerned with the lack of green space and walking opportunities afforded them in the new plan: The “Tot Lot” for example is felt to be a poor substitute for the “common” outdoor meeting space that they now enjoy. Uncomfortable in going “public” with all their concerns (fearing this will influence their chances for future housing) and being left on the “sidelines” of this “discussion” has been their frustration from the outset.

9. OUTDOOR RECREATION SPACE LACKING IN SPACE, FACILITIES & DESIGN.

The underlying design challenge is that the developer is trying to meet the needs of two distinct groups: families to be housed in town-housing, with the needs of low income people of all ages and disabilities (Apartment dwellers). While laudable in concept, this mix of tenants of different backgrounds and needs can only work if there are viable outdoor spaces and facilities for groups to mix and to mingle. The single space proposed for the “Tot Lot” as noted above, is not only too small and inconveniently located, especially for who would be living in the Apartment, but it has few facilities for the older children such as swings, slide, exercise equipment or just uncluttered green space to kick around a ball; all activities, which if more land were provided, could make this common green space workable for all. Accordingly, expect the older children to play on the parking lot and access lane, if not on the school grounds when available and the tenants of the Apartment to feel relegated to their rooms and the terrace overlooking Townley Road. With the future of Richmond School and the play fields in doubt, not providing for adequate recreational spaces now will seriously limit future recreational options for both groups of tenants.

10. THE LOCAL AREA PLAN REQUIRES THERE BE A “GOOD FIT”.

The Shelbourne LAP (among other Saanich policies) states that multi-family developments should be considered only if they are compatible with neighbouring properties. In the opinion of the Neighbours, the development proposed by the GVHS is not only a misfit by reason of its high density and high lot coverage, and “landmark” four story height of the Apartment, but because it violates Saanich planning policies for “step-down” development and need for such high density projects to be constrained to major thoroughfares. The large number of residents who so far have signed a petition against this rezoning (see attached Petition) would like to see these policies enforced!

11. ALTERNATIVE CONCEPTS SHOULD BE CONSIDERED.

if the GVHS had consulted with neighbours much earlier in the process, and were convinced to stick to building 2-3 storey apartments rather than the town housing, which if built, would consume most of the property, some interesting options unfold: Two concepts have been proposed to the proponent, each showing how the GVHS **might achieve as much as 50% more housing units** (over 80 units compared to the 49 now proposed). This focus on apartments could not only save on building, underground parking and access costs, but enable a much smaller building footprint to be achieved (similar to the present apartments) . But just as important, it could free up the space to enable the retention of most of the green space, trees and future options for recreation and development.

12. NOT LISTENED TO.

And finally, we feel overwhelmed by what has been proposed and underwhelmed by the little results achieved by nearly a year of discussions held with the GVHS. In looking at the final proposal it is apparent we were not listened to on the issues most important to us – the 49 foot height and massive scale of the Apartment proposed, and the large footprint imposed by their development- a project so efficiently designed, it must destroy the very landscape and green space that makes it so endearing to all.

RECOMMENDATION from the NEIGHBOURS FOR THE WISE DEVELOPMENT OF TOWNLEY LODGE:

That the rezoning to RM-6 by the GVHS not is approved and that a lesser zone more consistent with the character of the neighbourhood, its buffer of trees and green space, and the needs of the future Apartment Tenants is considered by the proponent.

And that whatever zone and design is finally approved, it must adhere to the policy guidelines of “step- down development” espoused by Saanich plans and policies- which in this case, would be limiting the Apartment and town housing to a height of 3 stories, and requiring a “step-down” to 2 stories where these buildings abut the single family residences adjacent.

We thank you for your careful consideration of this important rezoning.

Yours truly,

“Core” Neighbours for the Wise Development of Townley (all adjacent land owners residing along Townley, Ilene Terrace, Oriole St. and Queenston Ave:

Ben and Jen Walker, Bob and Liz Nugent, Dave Blunden, Joan and Ed Collis, Susan Roberts, Meralin and Joe Young, Nancy and Chris Balmer, Nick and Ashley Sherrington, Sarah Bradley, Steve and Denise McGlade, Garner Scheidt, Leigh and Carol Urquhart, Ella J, Mark and Barb Vinnish, Mary Kelly, Amanda McAlpine, Helen Miller, Taylor and Peter de Groot, Anne and Chris Munson, Al Lubkowski

CC: Sharon Hvodanski, Director of Planning Services, District of Saanich

Sandie Menzies, President, Camosun Community Association and Directors

Expect a Petition of over 70 neighbours and letters in support of our position from the Community to accompany this Recommendation.

APPENDIX

TABLE 1 – VARIANCE REQUESTS TO INCREASE BUILDING HEIGHT

ZONE HEIGHT COMPARISON	Single Family	Town Housing	Apartments
RA-1 Presently Existing Zone	7.5 m 24.6 feet	Not Permitted	2 story 7.5 m or 24.6 feet (7 meters is actual height of present apartment)
RM- 6 Presently Proposed Zone	NA	7.5 m or 24.6 feet max.	11.5 m or 37.7 feet or 3 stories equiv.
<u>RM-6 Zone Proposed Plus height variance increase requested</u>	NA	9.9 m or 32.5 feet (another 7.9 feet higher than allowed)	14.4 m or <u>47.2 feet so as to gain another storey</u> (9.5 feet higher than allowed and 24.3 feet higher than present apartment)

TABLE 2 – VARIANCE REQUESTS - SETBACKS

VARIANCES REQUESTED PROVIDING RELIEF FROM FRONT AND SIDE YARD SETBACKS AND BETWEEN BUILDINGS		
FROM STREET	7.5 M	Decrease To 4.5 m
FROM INTERIOR SIDE YARDS	7.5 m	Decrease to 6.0 m
BETWEEN BUILDINGS	From 1 to 4 metres less than required!	

TABLE 3 – VARIANCE REQUESTS FOR PARKING

PARKING	REQUIRED	PROPOSED
Apartment dwellers	26	20
Town housing	24	16
Visitors	21	7
TOTAL	71	43
SHORTFALL and VARIANCE REQUESTED	27 spaces	