



## ROCKLAND NEIGHBOURHOOD ASSOCIATION

July 12, 2014

Mayor and Council  
Planning and Development  
City of Victoria

Re: Rezoning and Development of 1082 Richmond Avenue

While the RNA appreciates the proponent's efforts to emphasize a more contemporary and transitional approach, the sheer building mass of this proposal does not respond to the character and charm that define the Rockland neighbourhood. The proposal also ignores the three-storey criteria of the guidelines of the OCP DPA 7A: Corridors and the Oak Bay Avenue Design Guidelines 2001. Neighbours to the west are specifically concerned about the privacy and shading impact of both the greatly-reduced setbacks (from 9 m./29.52 ft to 4.287 m./14.06 ft.) and the increased height (from 10.7 m./35.09 ft. to 14.934 m./48.98 ft.) They are also concerned about on-street parking congestion. Neighbours to the east have emphatically voiced concern about significant increases to traffic congestion and parking issues at an already busy intersection.

The project planning principals may be commendable, but they do not comprehensively advance the objectives of the OCP. The proponent has "cherry picked" the Urban Residential criteria but ignored the balance of the OCP, most specifically Building Performance section 12.17, which calls for private development of green buildings. We are appreciative that after further discussion, Abstract Developments Inc. has agreed to include a covenant or legal agreement requiring BuiltGreen certification, or something very similar, in their proposal. The RNA believes that the OCP should be a reference piece in its entirety, to be used as a tool, not a weapon. If increased density is forced upon us, it should be the responsible, green density the OCP embraces. A requirement for green building criteria along all corridors would raise the quality of projects and enhance the implementation of the OCP.

While the project is in an area designated in the OCP for an increase in multifamily development over the next 30 years, we are possibly a decade away from having an updated corridor land use plan. It would be premature to support a development at the maximum limit FSR envisaged in the OCP. As we have stated to council, the RNA is very concerned that acceptance of this proposal's density of 2.0:1 would create a precedent that all developers would reference along all corridors in the future.

An odometer check indicates the site is 500 m. from the junction of Fort and Oak Bay and 300 m. from Morrison and Oak Bay at the perimeter of the Stradacona Village. It is

also 300 m. from the perimeter of the Jubilee Village at Fort and Richmond, not the 270/230 m. suggested by the proponent. It is also 900 m. from the main entrance to Royal Jubilee Hospital. The site is not immediately adjacent to either proposed village. In particular, it is some distance from the real hub of Stradacona Village. Nor does the project fall within the Oak Bay Avenue Village, OCP Map 48.

The proponent is also incorrect in claiming that the RNA prefers the four storey option. The RNA LUC was presented with only the architect's rendering of four and five storey options. Because plan revisions had not been received prior to the viewing for review and discussion, we declined to comment on either proposal. The community members who attended reiterated their concerns about privacy, shading, parking and ingress/egress on what the proponent acknowledges is a busy corner. The RNA's preference is that the proposal be built to the current zoning standards of R3-A2 and the OCP Built Form of Urban Residential of a total FSR of up to 1.2:1, respecting setbacks to ensure privacy, height to reduce shading and less density to reduce traffic congestion.

While the plan does advance some aspects of the OCP, it is disappointing that the opportunity to discuss an amenity package was missed. Delivering a plan with 57.7% site coverage does not respond to the OCP Plan Goals of ensuring "unique character and sense of place," a "greener, more resilient and healthy city," or "private green spaces [which] support healthy and diverse ecosystems." Ironically, the pursued 57.7% site coverage in no way addresses the city Storm Water Management initiative, in which reducing hard surfaces is a key component. Further, there is no acknowledgement of the goal that "new and existing buildings [be] energy efficient and produce few greenhouse gas emissions."

The RNA is alarmed to find that the plan has moved forward with even greater density than that which was proposed to the PLUSC on August 16, 2013, when Senior Planner Helen Cain recommended that "The applicant also should provide a land lift analysis to justify any increase in density that exceeds the R3-A2 zone entitlements and that exceeds the maximum of 1.2:1 FSR in the OCP for Urban Residential areas." Unfortunately, this analysis proposal was removed from the PLUSC motion of Sept 9, 2013, certainly resulting in a lost opportunity, especially now that the applicant brings forward a 2.0:1 density.

The RNA's strong preference is to have current zoning be the standard for building along the Fort-Oak Bay corridor; however, the OCP has unilaterally changed the rules. If city council is willing to entertain a proposal with such an excessive degree of massing on a relatively small lot, it must at least make mandatory on corridors throughout the city the inclusion of sustainable building practices such as the proponent is willing to undertake.

Sincerely,

Janet Simpson, President  
Rockland Neighbourhood Association