



Royal Oak Community Association

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November 30, 2020

Mr. Chuck Bell
Area Planner, Carey
District of Saanich
770 Vernon Avenue
Victoria, BC V8X 2W7

Via email: Chuck.Bell@saanich.ca

Dear Mr. Bell:

Re: Referral Response: 520 Normandy Road (no project name)
Applicant: Aryze Developments Inc.
Saanich Planning Files: DPR00766 and REZ00647

We are responding to the referral request sent to ROCA on May 22, 2020. Please note that this memo supplements our memo to you of June 24, 2019. Our reply has been considerably delayed, as we have been awaiting additional project information and a meeting or video conference with the applicant.

The applicant has unfortunately not been forthcoming in providing any information to ROCA, and repeated attempts since last year to arrange a meeting or video conference have so far been unsuccessful. We also await the *Traffic Impact Assessment* for this project, and trust that Saanich Planning will forward a copy of this file to us when it becomes available. What this report contains will determine whether we provide additional comments to you. We have included some comments on the traffic situation herein that we feel are pertinent, regardless of the traffic study.

The information sources we were able to review include the Saanich Planning website, the Saanich Planning summary letters to the applicant of October 11, 2019 and August 25, 2020, the *Parking Variance Report*, *Streamside Protection and Enhancement Areas* (SPEA) report, and the Saanich ADP meeting held on October 21, 2020.

Parking

The *Parking Variance Report* (April 24, 2020) by Bunt & Associates outlines that 110 vehicle spaces are required by the Saanich *Zoning Bylaw*, whereas a mere 36 are proposed (33% of the required), which represents a 74 space variance. The total parking requirement should be calculated as 114 rather than 110, based upon how the *Zoning Bylaw* is interpreted. With 4 spaces allocated to visitors and 1 space for a car share vehicle, 31 spaces would be available to the residents of the 73 units, with the majority of 42 units not having a parking space available.

The Bunt parking report provides various examples of multi-family properties around Greater Victoria that have considerably less than what would seem to be a reasonable number of parking stalls as partial justification for reduced parking at this project. ROCA would suggest that such comparisons are irrelevant to this site and location and thus should only be viewed on its own unique characteristics, not that of other jurisdictions.

The parking study outlines that certain factors can impact the amount of parking needed, including: location, housing unit size, whether the unit is owned or rented, household income, and use of Traffic Demand Measures (TDMs). The Saanich *Zoning Bylaw* does not have provisions for allowing any of these factors to be used to reduce the amount of parking required.

The site is just outside the 400 m radius to the Royal Oak Shopping Centre and Broadmead Village that is considered walkable in Saanich planning documents, although the Walk Score is 59 (Somewhat Walkable), Transit Score is 53 (Good Transit), and Bicycle Score is 88 (Very Bikeable). These are positive factors for somewhat reduced parking supply, yet most people currently own vehicles and would unlikely be willing to abandon them. It is also noted that no parking is allowed along Elk Lake Drive and limited parking is available along Normandy Road.

Due to the significant deficiency of on-site parking and very limited on-street parking nearby, it is envisioned that the parking lot at adjacent Saanich Commonwealth Place would become the parking location of choice for many residents or visitors at 520 Normandy Road. ROCA deems this to be unacceptable, and believes it would also be unacceptable to the District of Saanich. It is foreseeable that this parking lot would need to post "No Overnight Parking" signs and potentially limit parking time, which would require ongoing monitoring and enforcement, and also be an ongoing inconvenience and frustration for facility staff and users.

Traffic

While we await the results of the *Traffic Impact Assessment* for verification, ROCA believes that the location of this high-density housing development on the corner of Elk Lake Drive and Normandy Road is likely to have significant implications for the Elk Lake Drive / Royal Oak Drive intersection, as they are in very close proximity. Access to Normandy Road from Elk Lake Drive may indeed need to be restricted to right turn only access or egress, versus trying to jam a traffic signal into this intersection so close to the Royal Oak Drive intersection. Conversely, perhaps closing off the Elk Lake Drive access entirely to/from Normandy Road may be required for safety reasons.

We note that the *Traffic Impact Study* for Doral Forest Park (a little further up Elk Lake Drive) states that, even without the added impacts of the proposed 242 unit Doral Forest Park or 520 Normandy Road, the Elk Lake Drive / Royal Oak Drive intersection is predicted to fail NEXT YEAR. With 520 Normandy Road added, this intersection failure is almost assured. An additional concern is that this intersection is where the soon to be expanded Saanich Fire Station No. 2 is located, which itself has implications for traffic flow considerations at the same intersection.

The cumulative traffic impacts of 520 Normandy Road, Doral Forest Park and expanded Fire Station No. 2 need to be accurately and objectively determined by a traffic study that takes into consideration the collective impact of these proposals. Individual developer-commissioned *Traffic Impact Studies* do not take into account the cumulative impact when several high-density proposals come forward simultaneously on the same street. Although the cumulative traffic impacts to both residents and Saanich Fire Station No. 2 from both the 242 condo Doral Forest

Park and the 73 unit 520 Normandy Road project have not been determined, it is believed that if both of these projects were to proceed, an upgrading of the Elk Lake Drive / Royal Oak Drive intersection would likely need to precede construction, and should be required as part of any approval that might be provided to either or both.

Building and Site Considerations

The majority of the 65 apartment-style rental units are studios (24) and one bedroom units (29), and their average size is very small, at 460 sq. ft. and 560 sq. ft., respectively. Combined with the lack of on-site parking, as well as the lack of on-site storage that was noted in the ADP meeting of October 21, 2020, it is readily apparent that this complex is directly targeted to the low-income rental market, which sets itself apart from the surrounding land uses.

Current RS-6 zoning allows lot coverage up to 40%, whereas the proposed is 58%; current allowed FSR is 0.50, whereas proposed is 1.63; and current maximum building height is 7.5 m, whereas proposed is 21.9 m. Thus, the development proposal VASTLY exceeds what is currently allowed in EVERY respect. The proposed development is three times the allowed density, three times the allowed height, and additionally greatly exceeds the allowed lot coverage. A 7-storey tower would clearly dominate over the surrounding single-family dwellings.

Additionally, the massive “big box” style of architecture would be greatly out of place with the existing quality and character of Elk Lake Drive and surrounding land uses. The block-long (20 apartment wide) 7-storey tower set hard against Elk Lake Drive, would dominate viewscales and be a jarring and overpowering landmark that is disrespectful to the surrounding Royal Oak neighbourhood. The nondescript long and narrow building very much has a stark institutional appearance, which is clearly illustrated in the attached comparative images attached at the end of this document.

It is ROCA's view that a 73 unit residential complex comprising 65 rental units in a 7-storey building and 8 townhouses, far surpasses a reasonable density for this site, as the overwhelming scale would dominate the area and not be acceptable to the neighbourhood.

The siting of the outdoor garbage and recycling area was mentioned several times during the ADP meeting, with concerns expressed about the suitability of its location. The suggestion was made to move it into the underground parkade. However, the applicant's architect stated that there is insufficient room to do so, as space is already crowded to the extent of there not being any room for tenant storage lockers. A portable pulley system is being considered to store a few belongings above the parking stalls.

There is an additional concern that wasn't raised at the ADP meeting. The garbage dumpsters need to be completely inaccessible to wildlife, as raccoons and bears are known to frequent the area, and rats are also common in the neighbourhood. Storing garbage outdoors would be an attraction to these animals and be a safety risk to the neighbourhood, and rats could still gain access even if they were merely fenced. ROCA is of the opinion that access to garbage and recycling bins needs to be from within the parkade, and that no exterior access should be permitted. Emptying of the bins would be less convenient and slightly more costly, but is done elsewhere, including the nearby 88 unit Park Royal Place condos further up Elk Lake Drive.

The AQUA-TEX *Streamside Protection and Enhancement Areas* (SPEA) report on the adjacent riparian area outlines that the many invasive species are to be removed from the creek-side

areas on both the subject property and across the creek on the Saanich Commonwealth Place side. The proposal appears to meet the required environmental preservation requirements.

Public Consultation

ROCA is dismayed that repeated attempts to obtain information from the applicant have not been successful, and it seems that public consultation in general to date has been very minimal, if not completely non-existent.

Before proceeding further with the review process, ROCA recommends that the applicant should be required to be more proactive in contacting the surrounding residents and business owners individually and asking for their input. Mailing or dropping off a detailed information package outlining the development to those north of Royal Oak Drive up to Elk / Beaver Lake Regional Park and east of Pipeline Road, including the townhome complex across Elk Lake Drive from Normandy Road, should be the minimum area covered.

This package should include accurate architectural drawings and all pertinent numbers such as: proposed number of units and their sizes, number of storeys, number of parking spaces proposed versus Saanich *Zoning Bylaw* requirements, etc. It is suggested that feedback be sent directly to Saanich Planning, with copies then forwarded to the applicant and to ROCA.

Community Amenity Contributions

ROCA is interested to know what Community Amenity Contributions are proposed by the applicant, and would expect that it adequately accounts for the significant proposed increase in density (from 1 single-family dwelling to 65 apartments plus 8 townhomes), the expected impact on the Elk Lake Drive / Royal Oak Drive intersection, and the major parking variance that is being requested by the applicant, very likely leading to residents using the parking lot at adjacent Saanich Commonwealth Place for overflow parking.

Recommendation

We reiterate and fully concur with the comments provided to the applicant in your summary letters to the applicant of October 11, 2019 and August 25, 2020. The recent changes to the development proposal exacerbate rather than address the major concerns previously raised by Saanich Planning and ROCA, and as such, we very much continue to NOT support this project.

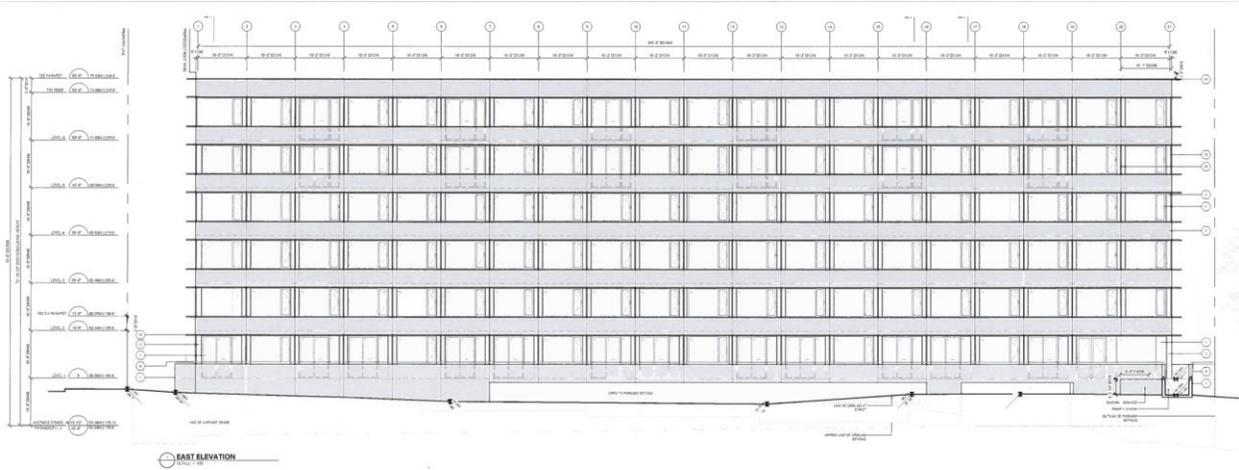
ROCA is, however, supportive of projects that it believes are consistent with the values and best interests of the Royal Oak neighbourhood. We would be supportive of a townhouse-style development that respects the existing single-family dwellings on Normandy Road and across on Elk Lake Drive, addresses the Streamside Development Permit Guidelines, and enhances the streetscape along Elk Lake Drive.

Respectfully submitted,



Roger Graham, President
Royal Oak Community Association
cc. Aryze Developments Inc.

Subject Property Elevations
Source: Saanich Planning Website



EXAMPLES OF SIMILAR "BIG BOX" STYLE ARCHITECTURE

Abandoned Residential School, Williams Lake, BC
Source: Vancouver Sun website



Kamloops Regional Correctional Centre

Source: *Kamloops This Week* website



Marine Corps Air Station – Futenma, Okinawa

Source: *US Navy Stars and Stripes* website

