



## Royal Oak Community Association

Box 50, #106 - 4480 West Saanich Road  
Victoria, BC V8Z 3E9

Visit us on the web at:

[www.RoyalOakCommunityAssociation.ca](http://www.RoyalOakCommunityAssociation.ca)

Email: [RoyalOakca@gmail.com](mailto:RoyalOakca@gmail.com)

October 29, 2020

Ms. Gina Lyons  
Area Planner, Royal Oak  
District of Saanich  
770 Vernon Avenue  
Victoria, BC V8X 2W7

Via email: [Gina.Lyons@saanich.ca](mailto:Gina.Lyons@saanich.ca)

Dear Ms. Lyons:

**Re: Additional Comments on Doral Forest Park  
DPR00573 and REZ00539 – 4734/44/54 Elk Lake Drive**

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Noteworthy additional information on the proposed Doral Forest Park development has come to ROCA's attention since our previous submission to Saanich Planning on April 13, 2020. We would therefore like to provide some follow-up feedback for your consideration.

### **Parking**

In reviewing the Watt Consulting Group's revised *Parking Study* (June 17, 2020), ROCA is of the opinion that the rationale used in this report does not justify the proposed shortfall of 155 resident and visitor parking spaces (57% of the required number) that is proposed.

An assumption made in the *Parking Study* is that no on-site parking will be required for the affordable housing units, as the applicant could give preference to selling units to purchasers who do not own or lease a vehicle. This restriction would greatly reduce their marketability, and cannot be made legally enforceable for either the applicant or subsequent owners. Therefore, we believe that this assumption is insufficient justification for not providing ANY parking spaces for 43 condo units (Saanich *Zoning Bylaw* requires 65 spaces for 43 units). Further, the *Parking Study* was based upon 43 affordable units, but this number has since been reduced to 20, and so the calculations and conclusions of the *Parking Study* should ideally be updated.

The applicant is proposing well under one resident stall per unit (184 stalls for 242 units), with 58 units (24%) having no parking stall available. By comparison, there is more than one resident parking stall per unit at adjacent Park Royal Place (96 resident stalls for 88 units). Park Royal Place also has 24 visitor spaces, and this combination of resident and visitor parking (118 stalls total) barely adequately meets the demand with 88 housing units. The Doral applicant and its *Parking Study* contend that many fewer resident stalls, and the same number of visitor parking spaces that exist at Park Royal Place (24), will adequately service 242 units.

Further, the “Walk Score” for this site is 25, which is well within the “Car-Dependent” category, with most errands requiring a car. The only street parking nearby is along Marsett Place, but this has already reached its capacity for the majority of the day (***as illustrated in the photo attached at end of this document***).

Additionally, it is felt that caution should be used in determining the impact of the contemplated Traffic Demand Measures (e-bikes and car sharing) at Doral. While we believe there would not be a major uptake of these measures and ongoing operational costs for them would simply be transferred to the Strata with no assurance of sustainability, their actual affect on on-site parking shouldn't be heavily relied upon for planning purposes, as their impact has yet to be objectively substantiated with actual results elsewhere. Regardless, TDMs certainly would not have ANY impact on the number of visitor spaces required.

ROCA strongly believes that the significant shortfall of on-site parking would have an unacceptable and deleterious impact on the surrounding neighbourhood. ROCA further contends that the requested parking shortfall clearly demonstrates that the site density is inconsistent and unreasonable both for the area and with respect to minimum Saanich requirements and should not be considered.

### **Traffic**

ROCA has reviewed the Watt Consulting Group's revised *Traffic Impact Assessment Update* (Feb. 27, 2020) for Doral. Consistent with similar studies, the report generally attributes future nearby intersection failures to unidentified and unsubstantiated “background factors”. Even without the added impacts of Doral, the Elk Lake Drive / Royal Oak Drive intersection, where the soon to be expanded Fire Station No. 2 is located, is predicted to fail NEXT YEAR. With the impact of Doral, the wait time when heading south on Elk Lake Drive and turning left onto Royal Oak Drive is projected to increase by an additional 55 seconds in AM rush hour and 65 seconds in PM rush hour over the existing wait times. This time delay is considerable and unreasonable.

ROCA believes the traffic impacts of Doral (and indeed the other proposed high-density housing developments nearby) are not being fully accounted for with individual developer-commissioned traffic studies. Considering the number and scale of the currently proposed developments in the neighbourhood, ROCA is of the opinion that a comprehensive traffic study that evaluates the cumulative impact of all the proposed high-density housing developments, would do much to alleviate commonly expressed fears in the Royal Oak neighbourhood about the traffic impacts resulting from these large-scale housing developments.

### **Groundwater Geotechnical Study**

The groundwater impacts of an underground parkade on the aquifer in the adjacent Elk / Beaver Lake Regional Park were identified as a potential issue in the *Environmental & Social Review* by Westland Resource Group in 1994. Specifically, concerns were raised about the potential for groundwater flows to intercept the aquifer's water source, which in turn could disrupt the stability of the park's natural ecosystem. CRD Parks has requested that a professional groundwater geotechnical study be commissioned before proceeding any further with the planning process. ROCA considers this request to be a responsible action and wholeheartedly supports it.

Additionally, concerns have recently come to the forefront about the possible impact at the immediately adjacent Park Royal Place condos. This complex already has sump pumps in the underground parkade that run year round to divert groundwater flows, along with a generator to

keep them running during power outages. Any additional water ingress caused by redirected groundwater from an extensive underground parkade could be potentially catastrophic. Building insurance costs could skyrocket or become impossible to secure, yet are required for obtaining bank mortgages. This would make the entire complex unmarketable. After-the-fact mitigation measures would be complicated, and potentially not even successful. Further, there would be significant legal implications for all the parties involved, including: the applicant and its representatives, future Doral owners and owners of adjacent properties, as well as the District of Saanich.

ROCA is of the opinion that ANY proposed development on the Doral site with an underground parkade component must have a groundwater geotechnical study conducted by an independent professional engineer as a requirement of the planning process.

### **Community Amenity Contributions**

We note that the Community Amenity Contributions proposed by the applicant are to the benefit of the Doral property rather than to the community at large. These include the underground parkade, site coverage, green construction, sidewalk, e-bikes and car share vehicles, two BC Transit stops, and berm along Elk Lake Drive, etc. As to the berm, we query who owns this land and who would be responsible for its ongoing maintenance. These items would be irrelevant to the community if it weren't for the subject property. An equivalent contribution of \$1.3 million would much more significantly benefit the entire community if these funds were provided to improve facilities at popular nearby recreational attractions such as Saanich Commonwealth Place and/or Elk / Beaver Lake Regional Park, for instance.

### **Advisory Design Panel Meeting**

We watched the Advisory Design Panel (ADP) meeting that was held on October 7, 2020 to discuss the Doral Forest Park development proposal, and were quite taken aback that for the most part, the ADP's own Terms of Reference were not covered in any level of detail in the questions that were asked by the panel members. There was no mention of: the character of the development in relation to adjacent and surrounding development; impact on and preservation of the natural features on the subject property; building quality with regard to livability and human needs; signage and outdoor lighting and light impact on the Dominion Astrophysical Observatory and on Neighbours; and aspects of the design related to health, safety, convenience, amenity and public interest. Thus, ROCA questions whether this meeting and its resulting determination adequately fulfilled the basic requirements and mandate of the ADP. It is also noted that nowhere in the mandate does the ADP have any "APPROVAL" authority, yet it regularly issues approval of projects, including this Doral Forest Park project, rather than simply providing advice to Saanich planning that the mandate requires. **Approval with no authority nor reasoning for such approval, does not constitute advice.**

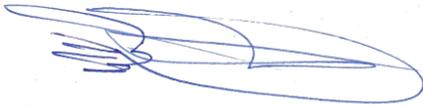
### **Recommendation**

Community feedback has been collectively strong in its opposition to this Doral proposal, and it is the responsibility and mandate of ROCA to provide support and advocate for well-established and cherished neighbourhood values. Through a public Community Forum, direct discussion and ongoing contact with the Royal Oak community, it is clear that while an appropriately designed development that would meet the RA-3 zoning requirements would be supported by ROCA and the community, there is no justification for a development with the densities being proposed at this site and which would shatter all community values and OCP policy.

ROCA reminds Saanich decision-makers of the statement on page 4-17 of the *Official Community Plan*, that reads “Support developments in ‘Centres’ and ‘Villages’ that ... concentrate the greatest densities of residential and employment activity near the centre or focal area of each Centre/Village and locate lower densities and building heights near the periphery.” (Emphasis added) By any reasonable measure, this proposal does not meet this OCP general planning policy, and to not support the Saanich OCP is to disregard the best interests of the residents of both the municipality and the Royal Oak neighbourhood.

Considering all of the foregoing, ROCA would almost certainly only support a development that conforms to the site’s existing zoning and protective Restrictive Covenant. Further, we firmly believe that any development that greatly exceeds the currently allowed density and scale would be a significant detriment to the neighbourhood, rather than an enhancement to it.

Yours sincerely,



Roger Graham, President  
Royal Oak Community Association

cc: Mike Geric Construction Ltd.



Phone taken on October 20, 2020 @ 12:15 pm