

Royal Oak Community Association

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November 5, 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 on Mateah Mixed-Use Development
Applicant: Mike Geric Construction Ltd.
4291 Glanford Avenue (C-14 Commercial Zone) and
750/760 Enterprise Crescent (M-3 Industrial Zone)
District of Saanich Files: DPR00798 and REZ00672

Members of the ROCA Executive attended the applicant's two Open Houses on Mateah (October 3, 2019 and November 26, 2019), and participated in a Zoom meeting with representatives of Mike Geric Construction, SHAPE Architecture and Enns Gauthier Landscape Architects to discuss the proposed Mateah mixed-use development on September 29, 2020.

Here are ROCA's observations on the proposed Mateah mixed-use development:

Relative Location

This site is in an outlier location away from an urban centre that is within a predominantly commercial and industrial area, which presents both challenges and opportunities when attempting to create an appropriate mixed-use development. Unfortunately, the proposed development with condo towers up to 10 storeys contravenes the OCP policy to restrict buildings higher than 4 storeys to within or near an established urban core. "Near" is defined in Saanich planning documents as being within 400 m, whereas this site is 850 m from the nearest urban centre, the Royal Oak Shopping Centre.

The visual impact of the proposed density, which is considerably over allowed zoning limitations, is not appropriately represented from the perspective shown on the applicant's presentation board illustrating its relative location. The drawing shows Royal Oak Drive overpass and Rosalie's Village in the foreground, and the subject property nestled behind them in the background. In order to show the true magnitude of the visual impact, the subject site should be in the foreground with the surroundings and uses in the background. This would more accurately convey the magnitude and massiveness of this proposed development on this site.

The intention to position this property as a destination for the neighbourhood is admirable. However, ROCA does not believe the concept would meet its intended potential, partially because while the landscaping is attractive, it does not have other sufficiently compelling attributes to become a destination in itself.

Most importantly, this is an outlier property within a commercial / industrial area that does not currently have significant pedestrian or bicycling activity and has no existing or proposed cross traffic. With a Walk Score of 41 and a Bicycling Score of 60, it is predominantly a car-dependent area. This site's defining transportation feature is the adjacent Pat Bay Highway, which effectively cuts a significant (about half of the) potential adjacent area off from easy pedestrian and bicycling access.

The lack of existing pedestrian connections and bicycling activity combined with no street level on-site parking would be a very challenging obstacle to overcome in attracting significant public usage. ROCA believes the concept as presented would be much more aptly suited to a location within a well-established urban centre, not in a light industrial commercial area.

Land Use

The Saanich Planning summary letter to the applicant of May 11, 2020 states that: "Staff are concerned about the scale and density of the proposed development and question whether this is the right location for such a development ... staff have concerns about the loss of industrial zoned lands".

The policies outlined in the "4.2.7 Industrial" section of the *Saanich Official Community Plan* also specify that the integrity of existing industrial land must be protected by limiting types of development to "service commercial which meets the basic needs of [industrial] employees". ROCA concurs that unless there are compelling and unique circumstances to justify removal, industrial land (e.g. 750/760 Enterprise Crescent) should be preserved for its intended use. In the September 29, 2020 Zoom presentation to ROCA, the architect did indicate with a slide that some "light industrial" use is included, but there was no detail provided. In short, this development proposal is predominantly residential in scope which is not compatible with the above-mentioned OCP policy to preserve industrial land.

Section "9.0 Housing" of the *Carey Local Area Plan* states: "While some new developments can be supported, they must be compatible with the neighbourhood character and quality ... the dominant residential parcel and dwelling type is single-family with 98% of the parcels and 81% of the dwelling units." It is noted that the subject property is not listed as a site suitable for multiple family units. Further, "Housing Policy 9.1" states to: "Protect and maintain the stability and character of Carey by maintaining single-family housing as the predominant residential land use."

We also note that an OCP amendment would be required to remove the land from industrial zoning, as well as to allow the proposed building height. The summary letter from Saanich Planning to the applicant of May 11, 2020 states that: "reduction of industrial zoned properties limits industrial use in Saanich and this discourages variety and balance, and so the scope of this development is tough to justify based upon Official Community Plan (OCP) policies and the loss of industrial lands." ROCA fully concurs with and supports this view of Saanich's Guiding documents.

An alternative industrial-related use for this site might be a film production studio, for example. The site is already zoned for a comparable use, Saanich Mayor and Council are on record as being supportive of a film studio in the community, and the location has convenient transportation linkages to the ferry terminal, international airport, downtown and up-Island. It would also assuredly bring significant new money into the community from elsewhere and be supportive of a wide range of nearby businesses. This multiplier effect with its community-wide financial spinoff benefits would be much greater than with housing, while the parking and traffic impacts would be much less than generated by high-density condo towers up to 10 storeys.

Parking and Traffic

There is a proposed shortfall of 144 on-site parking spaces (483 required; 339 proposed), and therefore a significant parking variance is being requested. This deficiency in parking is strongly indicative that the site would be overbuilt for its size if development were to proceed as intended.

The Watt Consulting Group *Parking Study* outlines that the only scenario upon which the shortfall could be BARELY met that is within the applicant's control, is to provide both an on-site Cycling-End-of-Trip Facility and electric bike parking. The *Parking Study* relies solely upon bicycling incentives to justify the proposed 144 space parking deficiency and while located in proximity to the Mann Royal Oak Local Connector bicycling route the site only has a Bike Score of 60, which is moderate at best.

ROCA notes that the Saanich *Zoning Bylaw* doesn't provide allowances for Traffic Demand Measures such as those proposed as justification to reduce the parking requirement. Even if the *Zoning Bylaw* adjusted its parking requirements to account for these factors, ROCA believes that the on-site deficiency is too great and would lead to negative consequences on the neighbourhood.

The *Traffic Impact Assessment* (TIA) prepared by the Watt Consulting Group estimates traffic volumes for 2023 to 2033 and states throughout the analysis section of the report that all traffic movements at adjacent intersections will operate without failures, apart from those stated. However, "those stated" are basically ALL of the nearby traffic light-controlled intersections, so this statement can easily mislead a casual reader into complacency. The TIA additionally states that: "There is limited right-of-way at the Glanford Avenue/Vanalman Avenue intersection to implement roadway modifications to achieve acceptable levels of service for all movements in the long-term." (p. 26)

It strongly appears that, directly attributable to this high-density mixed-use development, traffic lights would seem to be required at the intersection of Enterprise Crescent / Glanford Avenue. At minimum, traffic-controlled crosswalks would appear to be needed for adequate pedestrian safety.

Building and Site Considerations

Mixed-use developments can be desirable, are popular with the contemporary lifestyle trend of living, working and recreating all within the immediate neighbourhood, and commendably minimize impacts on the environment by eliminating commuting.

However, ROCA is of the opinion that an ideal mix of on-site uses that are compatible and self-sustaining at this location would be challenging to achieve. Indeed the combination of residential, commercial and industrial land uses contemplated, along with a significant public use component, would have serious ongoing complexities, conflicts and high maintenance costs. Potentially, the proposed mix and its design could even jeopardize the project's ongoing financial viability, as explained below.

All of the on-site parking spaces are planned to be underground, whereas the small commercial component will be on street level with day care located on a higher level. We do not believe that many shop patrons or child caregivers would readily park in an underground parkade and then use an elevator or stairway to reach their intended destination. With NO street level parking or surface parking available whatsoever the viability of the commercial component in particular is likely to be severely compromised as the clientele would then tend to be primarily limited to on-site residents.

We question whether having 58 studio condo and rental units out of 251 (23% of overall units), as opposed to larger units which would accommodate families is conducive to facilitating a sustainable day care that likely would be used primarily by on-site residents. . It is understood that the applicant would be eligible for a provincial grant up to \$250,000 (75% of eligible cost) if it provides daycare space provided there is continuous use as a day care for the number of years required. ROCA notes that this funding if received should ideally be secured by a covenant on the property.

Without considerable 24/7 human activity, ROCA is concerned that the public access gap level as proposed for two of the condo towers could all-too-easily become a target area for crime and illicit activities, especially at night given the somewhat remote location from other public centres in the neighbourhood. This might well necessitate active monitoring by security cameras and/or staffing, adding to costs and liability for Mateah owners.

ROCA considers the Floor Space Ratio (FSR) of 2.55 and the Site Coverage of 39.37% to be excessive for this site, particularly considering that the proposed land uses are, for the most part, contradictory to what Saanich planning documents deem appropriate at this location.

The landscape plan with large public open spaces, public paseo, expansive lawn and water feature are imaginative and provide an attractive setting for the buildings, and we commend the landscape architect for the concept it has developed.

Community Amenity Contributions

The Community Amenity Contributions proposed by the applicant are presumed to be an on-site Cycling-End-of-Trip Facility and electric bike parking, as these are outlined in the *Parking Study* as being required in order to justify a deficiency of 144 parking stalls. These facilities would mainly be of direct benefit to on-site residents, and to a limited extent perhaps, visitors to the site. Certainly, they would not be needed if the development weren't built.

ROCA queries if responsibility for the cost of maintaining the proposed cycling facility has been considered and whether it is to be borne by Mateah property owners, or if Saanich is willing to assume the ongoing responsibility and cost. We note that a proposed bicycle repair station by

the same applicant at nearby Doral Forest Park was turned down by Saanich due to concerns with ongoing maintenance costs.

We are interested to know if Community Amenity Contributions that would be of benefit to the community at large might be forthcoming from the applicant, particularly considering the massive scale of this proposed mixed-use development, and the fact that it deviates significantly from the policies of the OCP and Carey LAP.

Public Consultation

Any major proposed development whose ongoing viability and success depends upon a complementary and self-sustaining mix of land uses such as this one needs to take every reasonable step to ensure that it is strongly aligned with community needs and interests. This is particularly true for a project that has public usage as an integral component and presents itself as being a “destination” property.

The two Open Houses that were held in 2019 were a mere starting point for a much more comprehensive and inclusive public consultation process that we believe needs to follow. In fact, we believe that a significant number of nearby residents are still largely unaware of the development proposal.


ROCA is of the opinion that the applicant needs to be much more proactive and reach out to the broader Royal Oak area, not just the normally limited area that a re-zoning application would require_ especially since this is intended to be a destination property seeking to draw a clientele from a much greater area than the immediate neighbourhood.

A more fulsome and broad-based public consultation process would provide significantly more clarity and transparency about neighbourhood views on the impact of the development proposal than is presently known. The RASVMG and ROCA are representatives that advocate for neighbourhood interests and values, but these are not yet adequately identified, in our opinion. ROCA is quite willing to alter its viewpoint if evidence arises that supports a differing view from that presented herein.

Recommendation

Without the advantage of considerably more extensive neighbourhood input, and considering the range and implications of the various concerns outlined above versus any potential benefits, ROCA would NOT be in a position of supporting this project as currently proposed.

Respectfully submitted,



Roger Graham, President
Royal Oak Community Association

cc: Mike Geric Construction Ltd.
Residents Association of Strawberry Vale, Marigold and Glanford