



ROCKLAND NEIGHBOURHOOD ASSOCIATION

April 5, 2009

Mayor and Council
City of Victoria
1 Centennial Square
Victoria, B.C. V8W 1P6

Dear Mayor Fortin and Council,

Re: 1729 Oak Bay Avenue Development Permit Application

We have reviewed B.C. Housing's application to change the use from "college fraternity" to a "Supportive Recovery program" for ten semi-independent clients. A variance is required to the existing standards in the R3-A2 zone to relax the minimum lot size by 358 square meters. The following issues require attention for this proposal and others concerning health care facilities and forms of supportive housing:

- The City's applicable definitions and allowances for use are inadequate and urgently require clarification. Municipal zoning definitions (in Schedule A and elsewhere) no longer correspond to the models for supportive facilities now used by VIHA and BC Housing.
- Community consultation for this proposal excluded the Neighbourhood Association and did not meet a sufficiently high standard for transparency.

In its application, BC Housing incorrectly stated that the facility would be "Supportive Housing." We learned from VIHA representative Linda Johnson that the facility's clients will participate in "supportive recovery," involving ongoing treatment at the Adult Addictions program (1250 Quadra St). "Supportive Housing" and "Supportive Recovery" are completely different uses. Such errors are misleading, give rise to potential legal challenge, and set an unhelpful precedent. As we now understand the facility, it would correspond either to a "hospital," or a "Rest Home-Class A" but not a "Rest Home-Class B," which explicitly excludes drug treatment facilities. Without better coordination of the definitions among all parties, the City's zoning framework cannot provide an adequate foundation for transparent changes in land use.

Neighbourhood consultation concerning this proposal was inadequate for the following reasons:

- The Land Use Committee was not invited - as outlined in the Caluc Development Permit Process - to the Community Information Meeting on January 8, 2009.
- The City did not provide the neighbourhood association with the correct deadline for submissions to the March 19th Committee of the Whole meeting.
- A petition against the application signed by thirty neighbours was disregarded by Committee of the Whole on March 19th.

"Supportive housing" attempts to reintegrate its clients into the community. A disregard of due process does not contribute to the success of such a facility. Rather, it sows suspicion where none need exist. We also urge Council to consider the need for a formal understanding between the facility and the neighbourhood with a "Good Neighbour Policy" or other binding agreement.

It is our expectation that future proposals accurately disclose the envisioned change in use; solicit neighbourhood concerns according to CALUC guidelines and incorporate them into the project; clarify their relationship to the applicable bylaws and the Rockland Neighbourhood Plan; and create an agreement that serves a long-term, productive relationship between the community and the facility. We will not support initiatives that do not adequately protect the security and enjoyment of all residents in Rockland.

Janet Simpson
President
Rockland Neighbourhood Association