



ROCKLAND NEIGHBOURHOOD ASSOCIATION

June 9, 2011

City Counselors and Planning Department

City Council - City of Victoria

Re: Draft Official Community Plan

Dear Counselors and Planning Department:

We would like to express our appreciation for all the work that has gone into the draft plan and to thank you for the opportunities to discuss it with you. Nevertheless, we must point out several aspects of the proposed OCP that are of serious concern to our neighbourhood.

Generally speaking, there needs to be more focus on specific land use. Victoria has many unique neighbourhoods and we need to embrace and cultivate their differences instead of trying to make them homogenous. The gradual densification of housing throughout all of the neighbourhoods is a blanket approach that is a slap in the face to associations who have sincerely worked to develop neighbourhood plans which seek to preserve and enhance the very best attributes of their communities. The City's desire to force all neighbourhoods to comply to the same regulations will result in the destruction of much of the beauty and character of particular residential areas. Nor does there appear to be any recognition of the importance of tourism. Tourists flock to this city because of its unique beauty. Many of us either directly or indirectly benefit from this industry. The development plan needs to recognize its importance and plan accordingly or there will be fewer jobs and more homelessness.

Policy Directions

Section 7 Transportation and Mobility

Rockland is becoming increasingly subject to heavy vehicle traffic. Some parts of Linden, Moss, and Rockland are seeing large trucks such as WM disposal trucks on the streets from 6:00 am on. Moss, Linden, Richardson, Rockland, and some of the smaller, shorter streets need speed bumps; others, such as Robleda and Oak Shade Lane should be closed to through traffic.

Tour buses can be overwhelming on Rockland's narrow streets. Rules need to be established regarding parking areas, times of operation, and numbers of units per day.

The speed limit on designated bike routes without separated bike lanes should be reduced to 30 km.

Section 10 Environmental Management

Given the environmental challenges, the direction from higher-level governments and their plans, and the resources available to develop a comprehensive local planning process, the Draft OCP addresses many concerns and provides ample opportunity for neighbourhood participation in actions that will improve the liveability of the City in general and the Rockland neighbourhood, in particular. Please see the addendum for key initiatives.

Section 13 Housing and Homelessness

The overview contains two ambiguous terms: "housing affordability and affordable housing". These terms are viewed by most people as synonymous. The term "affordable housing" should be changed to "social housing" to avoid confusion.

The plan supports diversifying the range of housing types available in neighbourhoods and across the city to accommodate a greater range of age groups and household needs, including crisis, transitional, supported, and non-market rental housing. It also encourages "the renewal and adaptation of the housing stock to meet future housing needs." However, there is no mention of how the City plans to preserve the character of neighbourhoods while accommodating this plan. Rockland's boundary

along Fort Street is already predominantly rental, condominium, and alternative housing.

Part 3 Implementation

Section 18 Plan Administration

Section 18 refers to “densification” and “intensification” as desirable goals for development in Victoria. That this type of development in Rockland should be a planning focus of Victoria Council is a matter of grave concern to the RNA. Generally, one can be sure that “densification” and “intensification” equals reduction in green space and consequent de-oxygenation. Site coverage zoning regulations were established to ensure an appropriate percentage of building footprint to open space in Rockland. The Rockland neighbourhood, by virtue of its large lots, provides a far greater proportion of open space with carbon dioxide devouring possibilities than other suburban residential zones. Large landscaped Rockland lots enhance downtown high density dwelling with the clean air benefits of adjacent green space. The present promotion by Council of the construction of “garden suites” could grossly increase building footprints while reducing open, landscaped space for trees and other vegetation. Why, if it was originally determined by the authors of the zoning by-law that a certain percentage of site coverage was good planning, is it desirable to increase site coverage arbitrarily by as high an amount as 25 percent of the area of rear yards?

Additional issues arising out of any major increase of living units throughout the suburbs by means of the construction of secondary suites and garden suites are

- A. In a laudable attempt to save some green space, there is no requirement for additional off street parking associated with these units. Assuming most will produce one or two additional vehicles per unit, the narrow streets of Rockland neighbourhood could become congested with parked vehicles and subject to an inappropriate increase in traffic.
- B. Any increase of population throughout suburbia will consequently increase the daily flow of private and public

transportation from the suburbs to the workplaces in the city centre.

In addition to these problems, an increase in population and the effect of increased vehicular traffic add to the potential for heightened air pollution that would have already resulted from the loss of landscaped areas.

The solution appears to be a greater concentration of higher density residential development in close proximity to work places along with the continued preservation of the special qualities of suburban neighbourhoods such as Rockland.

References in the OCP document to planning objectives such as “density bonusing “ and “temporary use permits” cause concern. These terms are not fully explained by their definitions. There is a need for more comprehensive definitions in the Glossary section of the plan in order to permit the average citizen to weigh the pros and cons of such variations or deviations to zoning by-laws.

Section 19 Local Area Planning

If, in this “new model,” Rockland is one of the “urban places that face the potential of major change in residential and economic land uses,” how are we to trust that the values in the Rockland Neighbourhood Plan will not be ignored? If, in the name of “consistency,” the objectives and policies of our Plan are to be “integrated” with densification and transit corridor goals, what will happen to the integrity of the Rockland Neighbourhood? The 400 metre Fort Street transit corridor represents a substantial part of Rockland. Its proposed re-development requires greater clarification of specific land use. Should we look for density provisions in the form of parkland in Rockland? What do we get in return for the loss of our historic buildings and ambience?

Section 20 Neighbourhood Directions

Neither the “vision” referred to in this section nor the list of “strategic directions” fully reflects the wealth of information which can be found in the Rockland Plan 1987, which was produced and officially adopted by the City. This Plan incorporated the design intentions of the original planners of this special neighbourhood. It should be referred to and

updated if necessary, and its objectives adhered to in future development - especially to avoid decreasing existing open landscaped areas. Use of the term “infill” in this section is contrary to the intention of the Plan.

We are currently the only “Traditional Residential” area to have the strategic direction supporting “infill and intensification.” We hope this is an oversight rather than a deliberate plan for Rockland alone.

The RNA suggests that the Planning Department of the City would benefit from careful study of the adverse impact of the recent development at 1535-37 Despard Avenue on the ambience of this popular pedestrian route. This is a street which exemplifies the Rockland character. The poorly designed zoning regulation which has been used by developers to maximize building mass on several Rockland area lots reached its extreme urban core appearance in this unfortunate example. The R1-A zoning regulation requires a minimum lot width of 80 feet or 24 metres per lot for a single family dwelling. This width allows for an adequate spacing of residences, space for generous front yard landscaping and on street parking. The 100 foot wide lot in question is now occupied by two detached buildings which are designated by the planning department to be two *semi attached* living units in a building. Although the lot is not subdivided, the actual result is two buildings each of which is on a 50 foot lot rather than the required 80 foot wide lot. As several other 100 foot wide lots are found along Despard Avenue, there is a real potential for the nature of the street to be irreparably destroyed by additional closely spaced developments of this type. In other words, Despard could become a street of double the number of dwellings as was originally planned for. The development referred to has installed two wide, paved vehicular forecourts on what is one lot instead of the typically single driveway access to existing lots. This reduces front yard planting areas, street parking possibilities and the number of boulevard trees.

While we appreciate that City Council has approved changes to the R1-A zoning by-laws covering semi-attached and attached dwellings as a result of submissions from the RNA, this represents reactive rather than proactive planning. It would be advantageous to include in the OCP a requirement that the planning department is observing and appropriately dealing with unsatisfactory zoning outcomes.

We acknowledge the creation of development permit areas to provide design control for such semi-attached and attached dwellings but we question whether these provisions will adequately preserve the Rockland character and, in fact, if such a zoning use is appropriate for the Rockland neighbourhood. We reiterate our position, in accordance with the Rockland Plan 1987, that the best protection for the neighbourhood is a blanket development permit area requirement for all development in Rockland.

20.24.2

Stadacona Village at Oak Bay Avenue

This is an important and busy intersection with very little, if any, land to expand on (assuming the commitment to “community well-being” would prevent the loss of the tennis courts on the north side of Pandora). How is a “large urban village” appropriate for this site? Planners cannot create villages; they evolve with shops and pedestrian-friendly places.

20.24.3

Conserving the heritage architectural and landscape character of the neighbourhood

Specific plans to address our lack of parkland and to ensure the survival of our existing greenspace are necessary. Rockland’s two tiny “parks” can hardly be considered as such – noting that they are “within walking distance” makes a mockery of the City’s goals to “link people to nature, help reinforce neighbourhood character, [and] enable outdoor recreation.” Though it is not a park, the Woodland Garden on the corner of Craigdarroch and Joan Crescent, which the Association has been restoring for the past 15 years, should be noted in the OCP.

Also, Rockland has the largest number of heritage buildings on Vancouver Island, yet there is very little recognition of this. Apart from past awards for two large restorations, annual awards seldom include any Rockland projects. A specific heritage policy must be created for Rockland. This would motivate residents to protect Victoria’s mansions by adding them to the heritage register. With owner consent, many could be designated and thus be eligible for funding from the Victoria Heritage Foundation. Areas of significant heritage buildings should be classified as Heritage Conservation Areas.

Conclusion

The distinct character of each area of Victoria needs to be preserved. Rockland is an area filled with heritage buildings and green space. To change this would diminish its appeal as a tourist attraction and deprive the City and, indeed, the Province of a precious historical treasure.

Sincerely,

Janet Simpson, President

Addendum

Environmental Management: Key Initiatives

- Policy direction for ongoing updates to the Greenways Plan and the completion of a Parks Master Plan.

 - Maximize opportunities to create habitat corridors for the movement of native flora and fauna.

- Providing habitat connectivity and [urban forest](#) enhancements as identified through the City's urban Forest Master Plan.

- Designation of Sensitive ecosystems including Garry Oak Woodland.

 - Restoration of sensitive ecosystems on public lands and native habitat.

 - (Map 9 shows Government House woodlands, but not Rockland Woodland Garden)*

 - Entering into conservation covenants or providing incentives to protect environmentally sensitive areas.

 - Fostering long-term community stewardship of private and public lands to restore and enhance natural systems and species.

- Focusing the delivery of community services through hubs located in walkable centres.

- A network of pedestrian and cycling priority greenways.

 - This could include Rockland Avenue, achieving the objective of connecting the Downtown Core area with institutions and recreation attractions.

 - (Bicycle network is on perimeter roads (Fort, Oak Bay, Richardson, Richmond, plus Moss St.)*

- Pemberton Trail options delineated on Map 5

 - Rockland Avenue could be designated the "interim Pemberton Trail" pending significant progress on acquisition of currently impassable segments.

 - Linear access rights for a continuous, publicly-accessible

pathways (*Pemberton Trail*)

- Identification and marking of gateway locations along major access routes into the neighbourhood to enhance a sense of arrival and departure

- Partnering with the Songhees and Esquimalt First Nations to acknowledge and integrate the culture, values and heritage of First Peoples.

- Parks acquisition Strategy

 - Opportunities to leverage and partner with individuals to acquire or gain access to land for park

 - (*Rockland has lower priority because of current public access to non-park greenspace such as Craigdarroch Castle and Government House*)

- Develop and maintain a comprehensive natural assets inventory

- Monitor the ecological function and changing conditions of land, water, air, biodiversity, habitat quality and other ecological features.

- Controlling invasive species and management of urban wildlife, through activities such as education, outreach, and guidance on management techniques.

- Integrated watershed planning approach for the comprehensive management of surface water, rainwater and drainage, and groundwater resources

 - strategies such as bio-swales, erosion control and pervious surfaces
 - integrated rainwater management in sustainable site design, including landscape design to reduce runoff from storms,
 - plantings that tolerate local weather conditions, and the
 - integration of small-scale technology such as grey water harvesting in building design and construction.

- Development of a bylaw to regulate the removal and deposition of soil

- increase awareness and understanding of ecological features and

 - processes (*Rockland woodland garden*)

- Relocation of overhead wiring to underground, where feasible, through City subdivision and development regulations, and as part of local area planning

- Infrastructure for electric vehicle recharge built into policy for new developments*

- Citywide hazard, risk and vulnerability assessment for projected climate change impacts,

- Assessment of neighbourhood food system features and needs as part of local area planning.

- Increase in the number of allotment gardens, [community gardens](#), edible landscapes, food-bearing trees and other food production activities

- On-site food production activities such as edible landscaping, rooftop gardens and food-bearing trees.

- Keeping of poultry and bees; ... keeping of other small livestock for food production, appropriate to an urban environment,

- Support of small-scale commercial urban agriculture as a home occupation;

- Use residential accessory buildings for commercial agricultural purposes.