

September 16, 2022

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Attn: Gina Lyons

Re: REZ00720, Aryze/Telus Application 1805-1811 Feltham Rd

The Gordon Head Community Association (GHCA) strongly objects to this application for a five storey, ninety eight unit residential building on this small (37,000 sq.ft.) mid block site in a predominantly single family residential area. The proposal has elicited no support, and indeed strong opposition, in Aryze's presentation to the GHCA Board on February 16, 2022, Aryze's community "Zoom" information session on March 9, 2022, and at a GHCA-sponsored community meeting on September 8, 2022. The attached summary of that meeting provides important perspectives on the application by those who would be adversely affected.

Main reasons for our opposition are:

**Density:**

At a whopping 115 units per acre, the proposed density far exceeds the density of most of the new and proposed multi storey residential buildings along Shelbourne, a corridor where the GHCA and most Gordon Head residents accept well designed residential densification. To achieve this excessive density, the Aryze/Telus proposal reaches over 60 feet in height--well above the maximum height allowed in the "dense" RA-10 zone—blocking sunlight for much of the year on adjacent houses and the street. The setback from Feltham is less than 17 feet. Aryze's assertion that "the stepped design to mimic the rhythm of the neighbourhood grain while creating "pocket parks" for future residents" does little to soften the stark impact of this massive structure.

**Parking:**

The proposal for 67 parking stalls for residents and visitors of the 98 units is severely deficient. The bylaw parking requirement is 149 stalls, more than twice what is proposed. The reality is that most households will own at least one vehicle. Aryze's statement that "being rental allows parking supply to be managed--if parking is fully occupied, proposed tenants will be told that no parking is available" means that tenants and visitors without assigned stalls will park on nearby residential streets, streets that are already crowded with parked vehicles from unauthorized secondary suites, garden houses, and houses rented by up to six unrelated occupants.

**Street Safety, Infrastructure, and Community Amenities:**

Recent increases in density in Gordon Head mean more traffic and a need for community amenities, including proper concrete sidewalks, controlled crosswalks, parks and park improvements, day cares, and community centres. Safety along Tyndall and Feltham is compromised, particularly with university-generated traffic attempting to avoid McKenzie congestion. Concrete sidewalks need to be both built or improved on both sides of Feltham east of Tyndall. Aryze/Telus has made no proposals for off-site community amenities.

**Official Community Plan (OCP) and Gordon Head Local Area Plan (LAP):**

The application does not conform to the OCP or the LAP. Numerous policies of the OCP would be violated, including the policy to focus new multi-family development in “Centres” and “Villages”. This site is almost half a mile (800 meters) distant from the “Feltham Village”. (The GHCA has either conditionally supported or not opposed recent densification applications in the University Centre and Feltham Village). The site is not identified on Map 5.2 of the LAP as “Potential Multi-Family”, and Policy 5.4 states that rezoning for multi-family housing on parcels not identified on Map 5.2 should only be considered where significantly more community amenities are provided than would be the case with traditional single family subdivision.

**The Pathway:**

The Saanich-owned asphalt path connecting Fairhurst Avenue and Feltham is a valued and well-used link for pedestrians and cyclists. It bisects the proposed building site. Aryze proposes to buy it from Saanich, and dedicate part of it back to Saanich as a statutory right of way, presumably to acquire the air rights for the proposed above-ground corridors and subsurface rights for a parkade. Some residents are concerned that if Aryze acquires it, ways will be found to discourage public use. The pathway and the air rights above it are valuable community amenities and any future development on either side of it needs to respect its integrity. When a housing development on the site is eventually approved, a temporary detour around the construction site should be a requirement.

**Gordon Head’s Housing Mix: How Many More Apartments and Condos Do We Need?**

Well over 1500 new apartment and condominium units in multi-storey buildings are under construction or awaiting approval along the McKenzie and Shelbourne corridors in Gordon Head. There are an additional 621 new beds opening at the University of Victoria by mid- 2023. At a time when “missing middle” housing types are needed, no new townhouses have been built recently in Gordon Head, and only about 65 are in the application queue.

At two preliminary meetings between GHCA Board members and an Aryze representative to discuss the site and seek input on land use options, we indicated that a well deigned townhouse development would probably be supported by the GHCA and residents. This view was echoed at the February presentation to the Board, at the Aryze-sponsored “Zoom” session in March, and again at the GHCA-sponsored community meeting in September. The GHCA will be pleased to work with Telus, Aryze, and Saanich on a townhouse proposal for this site, with minimal variances for parking, setbacks, and building heights, and enhancements to the public connector between Fairhurst and Feltham.

Yours sincerely,

Peter Ostergaard  
for Chris-Poirier-Skelton  
President, Gordon Head Community Association