

October 22, 2017

Dear Mayor & Council,

Re: Abstract Developments' 3<sup>rd</sup> proposal for 1201 Fort/1050 Pentrelew

I am writing regarding Abstract's proposal for 1201 Fort/1050 Pentrelew. Quite simply, it's my assertion that the City of Victoria cannot demonstrate the need for any further development at this time, let alone dramatically increase densification where it's not allowed according to the OCP. I, on the other hand, can show that residential construction has not only kept pace, but exceeded population growth from 2011 – 2016 and that the city is now heavily over-developing.

I will also address with this letter the issue of housing stock diversity as well as affordability given that these two issues are at the forefront of so many employers and home seekers' concerns.

**Housing under-supply or over-supply?** – I have been documenting all information from Planning Services (Tinney's Aug 20<sup>th</sup> TC OpEd, and his emails to me and various neighbours, vs. public data and my own research on multi-family housing builds (primarily condos) in the City of Victoria. I have had to do my own research because Mr. Tinney asserts that the city does not track housing completions! (The open data site on the city's website shows records of every type of permit imaginable, except occupancy permits.) I can't imagine why this vital information is supposedly not tracked and how the city can properly advise Mayor and Council regarding housing needs if building completions aren't being tracked. (My data, in an email attachment to this letter, has been largely sourced from the Times Colonist, Citified and Douglas Magazine.)

Yet Jonathan Tinney has no compunction about stating that the housing supply is insufficient for the increase in population from 2011 – 2016 (Census data cites 5775 new residents) to present.

His August 20<sup>th</sup> OpEd headline in the Times Colonist read: ‘Supply key to housing affordability challenge.’ But his numbers don’t make sense. The city has not only kept pace with population growth but exceeded it and is on the verge of over-building. Allow me to make my case:



(Note: Mr. Tinney reported here <http://www.timescolonist.com/opinion/op-ed/comment-supply-key-to-housing-affordability-challenge-1.22012156> that 640 units were completed in 2015, not 965 as above. He also said that 940 units were built in 2016.) Adding those numbers, I get 3,747 units x 1.8 occupants/unit (City of Victoria’s multiplier) for a total of 6,744.6 occupant spaces. Given that the population increase in the Census data (2011 – 2016) was 5,775 new residents (not Tinney’s OpEd figure of 1300/year), construction in the City of Victoria has exceeded population growth from 2011 – 2016. To summarize:

**5,775 new residents** (Census data: 2011-2016)

2,807 units completed 2011-2015) + 940 in 2016 = 3,747 units x 1.8 =  
**6,745 occupant spaces constructed, 2011 – 2016**

Next, I turned my attention to 2017 and beyond with respect to the City of Victoria's development plans.

Mr. Tinney's stats (from OpEd): **2006 units under construction; 2,237 units in the planning/approvals stage.** My research shows this is inaccurate. On the attached Excel spreadsheet you will find developments listed by name with completion dates as reported from the previously aforementioned sources. I imagine there are more condo developments I've missed and my data excludes multiplexes, suites, carriage houses, infill housing and single family homes, therefore, one can assume my numbers are on the low side.

2017        817 units x 1.8 occupants/unit = 1,470 occupant spaces

2018       1,358 units x 1.8 occupants/unit = 2,444 occupant spaces

2019       1,130 units x 1.8 occupants/unit = 2,034 occupant spaces

2020       446 units x 1.8 occupants/unit = 803 occupant spaces

Approved with unknown completion date:

227 units x 1.8 occupants/unit = 409 occupant spaces

Total multi-residential units: 3,978 x 1.8 = 7,160 occupant spaces

Proposed 2,189 units x 1.8 occupants/unit = 3,940 occupant spaces

**6,745 occupant spaces (2011 – 2016)**  
**+ 7,160 occupant spaces (2017 – 2020 + )**  
**13,905 occupant spaces (2011 – 2020 +)**

**Add to that the proposed 2,189 units (itemized on my spreadsheet) x 1.8 occupants/unit for a total of 3,940 occupant spaces and the current and the impending volume of new construction is even more staggering.**

In participating in the development of the 2012 OCP, which has the “highest legal status of all plans” (pg 13), Victorians agreed to accommodate a population increase of 20,000 by 2041. Looking at the entire city:

**13,905 occupant spaces by 2020/20,000 projected population growth by 2041 = 70% of occupancy spaces for 20,000 residents will have been constructed in approximately 10 years!**

**At that rate of growth, Victoria would see a further 27,810 units constructed between 2021 and 2041 for a total of:**

**13,905 + 27,810 = 41,715 new occupant spaces (2011 - 2041) largely in condominiums. Add to that number other varieties of construction as previously mentioned, and the city would be building to accommodate at least 50,000 more people. This is not what was planned for in the OCP.**

There is absolutely no social license for construction taking place at this scale therefore, a dramatic increase in density at 1201 Fort/1050 Pentrelew that’s zoned ‘ Traditional Residential’ for roughly two-thirds of the site, is entirely unwarranted.

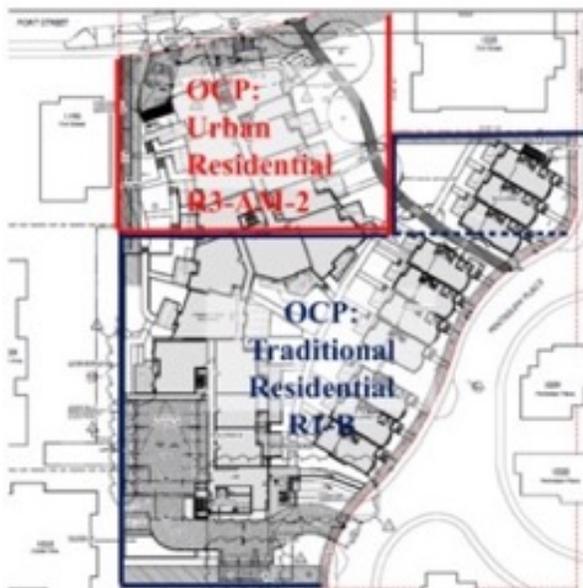
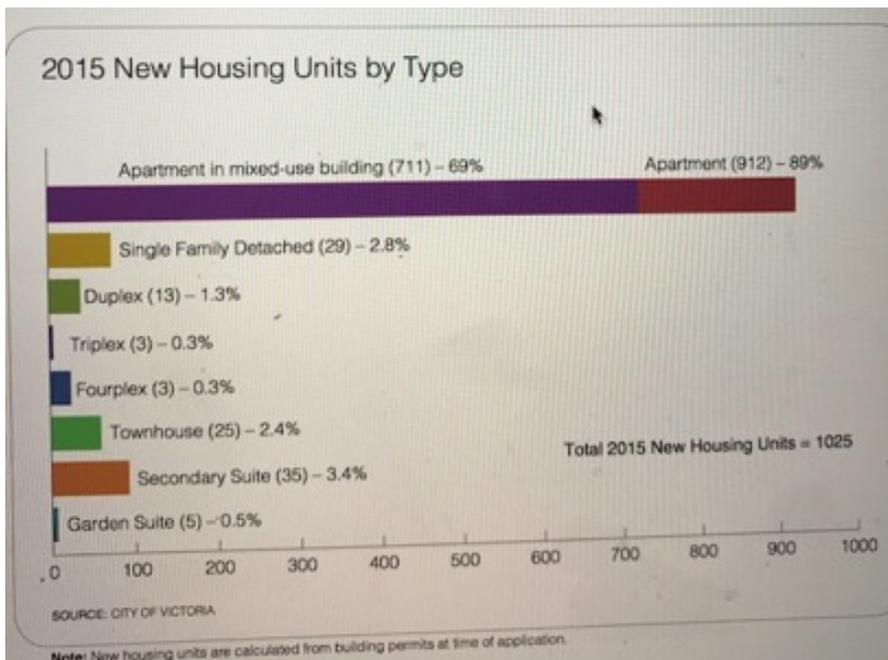


Image from Proposal Submitted – zoning added

Abstract has attempted to justify their request for an OCP amendment by citing their tree retention efforts. Fortunately, at the April 6 COTW, Alison Meyer addressed that ruse when she clarified that the amendment was intended to **“shift density and increase it beyond what R1-B zoning allows.”** Abstract has even planned for a portion of their proposed 6 storey building in the R3-AM2 zone to also fall within the R1-B zone.

### **Housing diversity vs. condos, condos and more condos**

Another variable to consider regarding the housing supply is diversity. As per the 2016 OCP Annual Review, *the “OCP encourages a wide range of housing types to support a diverse, inclusive and multi-generational community.”* Abstract’s proposal for 1201 Fort Street does not meet these requirements. More luxury condos and townhomes for the wealthy are not needed. Families and other working-age adults will be excluded.



Rockland and Fernwood neighbours are not opposed to development of 1201 Fort, but are overwhelmingly against Abstract’s plans. A community letter was sent to Mike Miller and copied to Mayor and Council on May 7<sup>th</sup> in which the immediate neighbours laid out our vision for the property. This

was done to counter Miller's assertion that neighbours were divided in their vision for the property's development.

For the south portion of the site, family friendly houseplexes are envisioned by the neighbours. Personally, I think that there can be no justification for underground parking and only minimal above ground parking allowed instead given that 1201 Fort is in a walkable neighbourhood on a transit corridor. (Abstract's argument for densification.) Excluding parking for 127 cars would also vastly reduce the price of these homes, spare the sequoias and other by-law protected trees, save mature trees from eventually dying as a result of extensive blasting, impingement on, and disturbance to, their root zones (from underground parking), and changes in the water table to which established trees do not respond favourably.

As per City of Victoria's 'Future Housing Types: Introduction'

## HOUSEPLEX

The City of Victoria is working with residents to explore new kinds of housing to accommodate new and future residents in neighbourhoods. *Tell us what you think.*

### OVERVIEW

A houseplex is a new home split into multiple suites. They can be owned by a single owner with the suites being rented, or they can be owned under strata like a townhouse. Houseplexes allow for multiple housing units to be included in a structure that looks like a single-detached house, or fits with a single-detached character. While Victoria already has many older homes converted into multiple suites, the houseplex option refers to new homes that are built with this purpose in mind. There are many possible design approaches.



## COURTYARD HOUSING

The City of Victoria is working with residents to explore new kinds of housing to accommodate new and future residents in neighbourhoods. *Tell us what you think.*

### OVERVIEW

Courtyard housing is comprised of small single-detached homes developed in a cluster to share open space and parking access. From the street these would look like small homes on narrow lots.

Small private patios can also be incorporated for each unit. This type of housing could include co-housing.



## TOWNHOUSE + SECONDARY SUITE

The City of Victoria is working with residents to explore new kinds of housing to accommodate new residents in neighbourhoods. *Tell us what you think.*

### OVERVIEW

Townhouses come in many shapes and sizes. Each townhouse unit includes a secondary suite. Much like in side-by-side townhouses, units will share walls with neighbours and share a ceiling or floor with the rental tenant. Each unit would have a private front entrance with access to the street. This housing type could include co-housing.

The sketch illustrates a single lot with two townhouses, and parking off of the lane. The secondary suite is typically the lower suite, as illustrated.

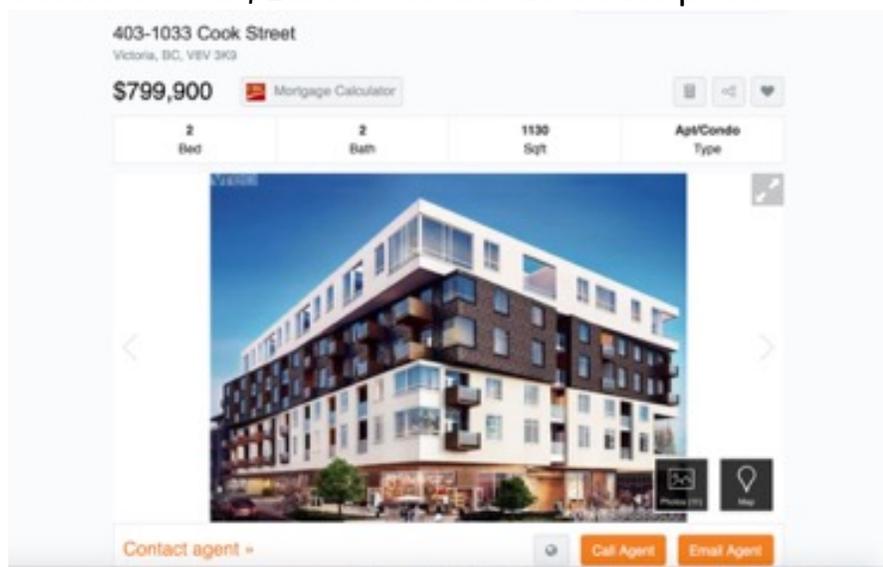


A village of 2 storey houseplexes on the southern portion of the site consisting of any of the above varieties would also be unattractive to investors. Family houseplexes are not good 'lock and leave' candidates.

Yet city staff are promoting instead, housing that's attractive to investors (i.e., 100% rentability) for 1201 Fort. This is a huge mistake. The CHOA (Condominium Homeowners of BC) have data that demonstrates that buildings with rental restrictions have the lowest vacancy rates and provide stable, affordable housing to both owners and tenants as well as having the lowest sales turnovers and the lowest use for short-term accommodations.

### **Affordable housing vs. more luxury units**

Given that a 2 bedroom regular unit in Abstract's Black and White (at Fort and Cook -- which will have zero landscaping) was listed much earlier in the year at \$799K and a 2 bedroom penthouse (#3) was priced at \$1.5 million in the same building, prices for 1201 Fort Street which will have green space, will undoubtedly be substantially higher. Especially the 3- storey ultra-luxury townhomes proposed for Pentrelew with media rooms, roof top decks and underground parking garages for 2 vehicles. Given Abstract's top prices for 1033 Cook condos, these townhomes homes will definitely cost well in excess of the \$1.5 million condo ticket price.



\$1,500,000  
MLS® Number: 376139

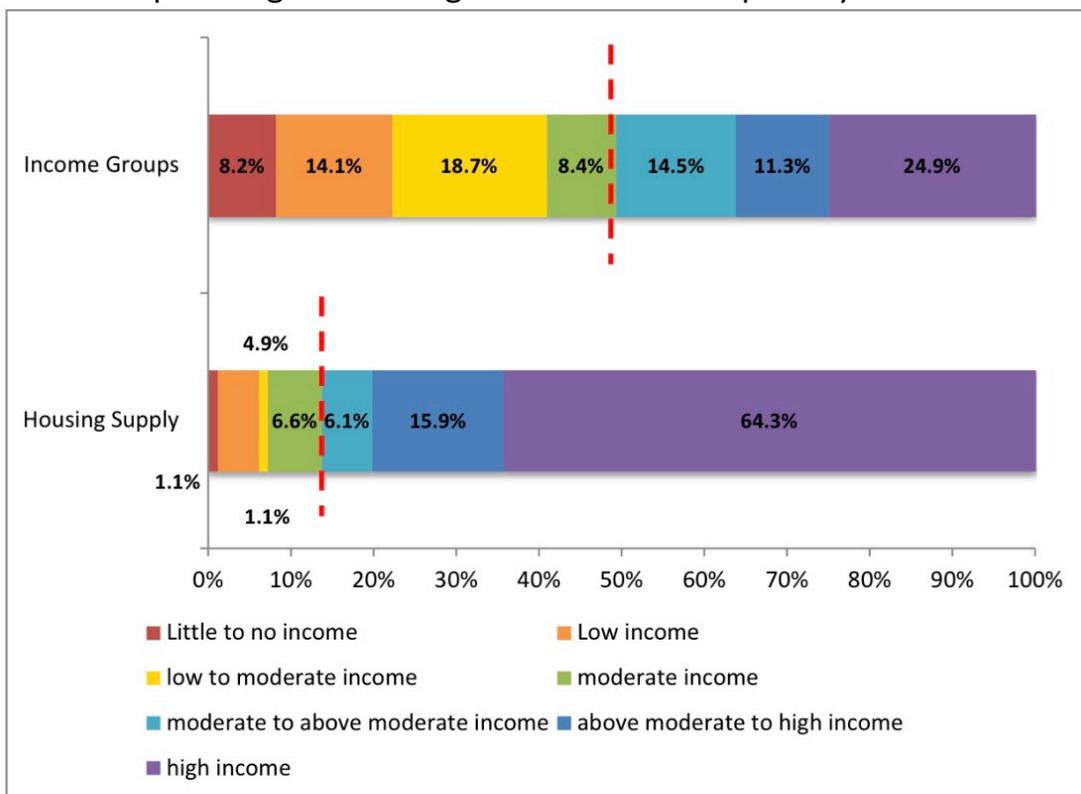
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Favourite Compare Print Financial

<b>Property Type</b> Single Family	<b>Building Type</b> Apartment	<b>Title</b> Strata
<b>Land Size</b> 1599 sqft	<b>Built in</b> 2018	<b>Total Parking Spaces</b> 2

The 2016 OCP Annual Review reported that Victoria has **“exceeded targets for regional share of new housing”** yet we know from the survey released in August re: employee recruitment that the type of housing being built is not meeting local needs.

Source: Capital Region Housing Data Book and Gap Analysis 2015



Sources: 2014 Facility Count (GVCEH), BC Housing (2015), Canada Mortgage and Housing Corporation (2014), and 2011 National Household Survey, Statistics Canada

Even so-called “below market” units , e.g., the ‘Vivid’ approved for 849 Johnson with prices ranging from \$275K - \$550K, is inaccessible to most Victorians. To qualify to purchase, prospective buyers must earn less than \$150K yet the most recent Vital Signs report shows that only 5% of the population earns in excess of \$100K. Who then are the luxury builds at 1201 Fort St. for if below market housing is now for the city’s top income earners? More luxury housing stock will only serve to exacerbate our housing crisis.

Furthermore, planning services’ recommendation for a CAC of 10 affordable units outside of Victoria (where lower income earners belong?) and a meaningless penalty of \$25k per unit if the developer fails to deliver in time amounts to little more than a drop in the bucket for Abstract. A penalty of \$250k will likely be less than half the purchase price for a single 1 bedroom unit.

In closing, I ask you to quash Abstract’s proposal for 1201 Fort/1050 Pentrelew as it would contribute to unwarranted over-development and fail to provide needed varieties of housing at income-appropriate prices for local residents.