



To: Mayor and Council

From: Eleni Gibson, Land Use Planning Advisor, North Park Neighbourhood Association Land Use Committee

Date: December 9, 2020

RE: Rezoning Application No. 00695, Heritage Designation Application No. 000188, and Heritage Alteration Permit Application No. 00016 - Wellburn's Site

Dear Mayor and Council,

The North Park Neighbourhood Association would like to comment on the proposed development for 1050-1058 Pandora Avenue and 1508-1518 Cook Street, also referred to as Wellburn's. The proposal includes retaining the exterior facade on Cook Street and Pandora Avenue and building a 6-storey mixed use development. As it stands, the NPNA cannot fully endorse the application.

The primary concern that the NPNA has with this development is that it does not include any affordable housing units; at a 2019 CALUC meeting, the proponent stated that rents for 1-bedrooms would like be approximately \$1,700/month, making it unaffordable for anyone making less than \$5,100/month after taxes. The proponent has never had a plan to provide affordable units in this building.

The NPNA has been advocating for more family-oriented housing in the neighbourhood, as many new apartment and condo buildings include only 1-bedroom units. With the proximity of Franklin Green Park, Central Park, Crystal Pool, several schools, the downtown, North Park Village, transit and cycling corridors, and other amenities, this location is ideal for families. The proposed development includes 15 2-bedroom units out of 105 total units. In a recent community survey launched by the neighbourhood association, affordable units for families was the most selected affordability objective, with 40% of respondents feeling family units are important. It is also worth noting that "any type of affordable housing is desirable" was also one of the most commonly selected objectives (37%), indicating that any type of affordable units in this development would be supportable by the community.

In the same survey, 168 out of 237 respondents indicated that they probably or definitely would "support higher or more dense developments in [North Park] if affordable housing units were part of the development." The height and density of this development is not a factor in the NPNA's concern, however, the lack of affordable housing inclusion is.



At the [CALUC meeting on March 20, 2019](#), the proponent stated that maintaining the facade would not result in eligibility for a tax exemption. If for any reason this development is eligible for a tax exemption for heritage retention/restoration, we would ask that the proponent enter into a Community Benefit Agreement (CBA) with the NPNA. The retention of heritage value on this site is minimal (2 facades on roughly ½ the site) and does not warrant significant tax savings, unless the community can see benefits realized in some other form.

The NPNA is currently working with Queen’s University masters students in urban planning on recommendations for a pilot Community Benefit Agreement (CBA) that could be implemented in North Park. In their forthcoming report it states that “A Community Benefits Agreement (CBA) is a legal agreement between a developer and a community. Sometimes a CBA will include a third party, such as a municipal government or elected officials.”

The following are recommendations as to what the City of Victoria could specify in a non-negotiable community benefit agreement that align with the priorities of the NPNA LUC.

- A. **Local procurement/employment for construction:** in alignment with the recommendations and initiatives of the Vancouver Island Construction Association and [AVICC](#) regarding social procurement: a project in which the City of Victoria played a leadership role.¹
- B. **Local amenities:** This could take the form of a minimum requirement of family units in new multi-family developments (see [New Westminster’s Family Friendly Housing Policy](#) for an example), affordable housing requirements, or use of public space to be negotiated with the NPNA

In summary, the NPNA would like to reiterate the priorities we are seeking from new developments such as the Parkway project:

- Affordable housing units; ideally for families but any size/form is desirable

¹ **Social Procurement/Community Employment Benefits requirement (A above)**

- This is consistent with work led by the Mayor's office in recent years, around social/strategic procurement. For example, the Coastal Communities Social Procurement Initiative led by Mayors of Victoria and Cumberland <https://ccspi.ca/>, in addition to the [Victoria Social Enterprise and Social Procurement Taskforce](#). Furthermore, in June 2020, The [City of Victoria requested information from suppliers](#) able to identify social value elements of their business in order to develop a Social Value Supplier Directory.
- This is also consistent with community benefit agreement work out of Toronto, Vancouver, and most recently in November 2020, (Surrey City Council recently adopted [Community Employment Benefits Policy](#))



- Variety of housing options - expanding the number of 2- and 3-bedroom units being built in new developments
- Street level experience - in this case, we support the covered bus shelter and pathway connecting Franklin Green. We would add the inclusion of attractive downlighting to improve street level experience.

Thank you for allowing us to comment on this proposed development.

Thank you,

Eleni Gibson, Land Use Planning Advisor
On behalf of the NPNA LUC and Board