

City of Victoria
1 Centennial Square
Victoria BC V8W 1P6

Re: Request to immediately add Central Park to the list of parks where sheltering is prohibited

Attention: Mayor and Council

CC: NPNA Board, NPNA Land Use Advisor, Masjid-Al Iman Mosque, Quadra Village Community Centre, Hillside Quadra Neighbourhood Action Committee, St. John the Divine, Victoria Immigrant and Refugee Centre Society, Family Services of Greater Victoria

Date: February 25, 2021

Dear Mayor and Council,

The signatories of this letter request that you support the staff recommendation brought forward on [January 21, 2021](#) to immediately “**add Central Park to the list of parks where sheltering is prohibited.**”

The sheltering that took place in Central Park from May through December of 2020 demonstrated that Central Park is an unsuitable location for both 7pm-7am and 24/7 sheltering.

It is imperative that Council moves to prohibit sheltering in Central Park on March 4, 2021 and *before* the construction of the Tiny Home Community begins. North Park residents are very concerned that during the transition and construction, Central Park will become a destination for sheltering again. As the demographics of North Park and the following facts support, residents in this neighbourhood rely on Central Park. Allowing sheltering again would disproportionately affect those who are already the most marginalized.

We request that you take the following facts into consideration and immediately add Central Park to the list of parks where sheltering is prohibited.

Central Park floods every year, and will continue to do so as weather events worsen.

Residents know and a [2017 geotechnical study](#) shows that Central Park is highly prone to flooding, which has the potential to do serious harm to the health and wellbeing of those who may be sheltering in the park.

North Park is already green space deficient, and equitable access to green space is incredibly important to North Park residents

According to the [“Community Values Survey”](#) conducted by the NPNA in October 2020

- 57% of respondents indicated that they feel that there is not enough access to green space
- 80% of respondents identified “Access to green space/parks” as the most important value to guide North Park development for the next 10-20 years

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North Park has been disproportionately impacted by homelessness and other social challenges. Sheltering in Central Park has, and would continue to have a larger impact on the neighbourhood and residents than in other neighbourhoods.

The amount of accessible green space to residents of North Park is 0.71ha/1000 residents, compared to Victoria average of 3.16/1000 residents

If you include RAP there are 1.23 hectares of parkland/1000 residents; the City average is 3.16ha/1000 residents. Once you remove RAP which is fenced off, and accessible only by paid admission, that decreases to 0.71ha/1000 North Park residents. Sheltering in Central Park would further reduce this access.

Loss of use of remaining green space in Central Park disproportionately impacts the most marginalized residents in Victoria

The [October 2020 "Community Values Survey"](#) conducted by the NPNA identified that residents making less than \$30k/year, refugees, immigrants, and racialized folks were the most likely to answer that there is not enough green space in the neighbourhood. These groups are least likely to travel outside of the neighbourhood to access other areas of green space/parks.

Many residents in North Park live in multi-family buildings with no access to green space.

Adequate and equitable access to public green space is important for the well-being of the community. In the 2012 OCP, two of the strategic directions for North Park were to "renew citywide recreational facilities," and create a new neighbourhood park (See proposed location at right).

The demographics of North Park support an equity centred decision that takes into account the disproportionate impact that sheltering in Central Park has on residents

The average resident in North Park is likely a renter living in an 5+ storey apartment building, who is more likely to use transit and is less likely to own a car. They are the most likely in Victoria to be low income and financially vulnerable. 15-30% of North Park residents live in subsidized housing, and nearly a quarter of North Park residents live in poverty. This is even higher for seniors and children (36% and 28%). Furthermore, North Park is already considered green space deficient. Despite several City owned facilities in North Park, there are no free to enter community gathering spaces.

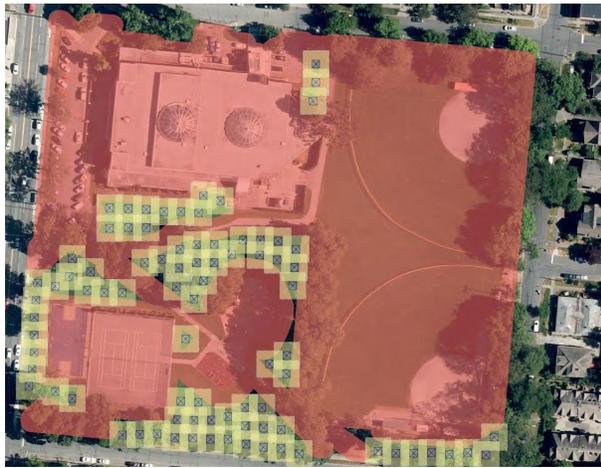
In North Park, Harris Green, and Downtown

- 77% of residents are renters, and 57% of residents live in 5+ storey apartment buildings (highest in Victoria)
- 28% of households are considered low income (second highest in Victoria)
 - 28% of children (0-17) live in poverty
 - 23% of adults (18-64) live in poverty
 - 36% of seniors (65+) live in poverty
- 15-30% of households living in subsidized housing (versus less than 15%, City average)
- 21% of households identify as immigrants (3rd highest in Victoria), and 4% of households are recent immigrants

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- 5% of households identify as Aboriginal

North Park is ranked 78 out of 78 for the most financially vulnerable neighbourhood in the CRD according to Prosper Canada's National Financial Health Index, a composite index of household financial health at the neighbourhood level. <https://communitydata.ca/NFHI/>



Bylaws do not support a manageable number of structures in Central Park

The new and existing bylaws would allow for up to 86 tents in Central Park (see below “maximum number of structures in Central Park: 86”), largely concentrated in the most socially important areas of the park (the lawn around the playgrounds, under shady trees, and where picnic tables are located). This is not a manageable number of structures, and would impact those who use Central Park as their backyard/only access to green space.

We also know that Central Park is more vulnerable to overcrowding compared to other parks because of its proximity to the concentration of support and services in the downtown area. Based on the bylaws, and Bylaw Services’ limited enforcement ability, we also know that efforts to redirect individuals to other, less flood prone, and less concentrated parks is not effective. The overcrowding in Central Park led to an entirely unmanageable situation.

There are no washroom facilities in Central Park

This is a criteria established by the City of Victoria for sheltering. As a response to the 2020 sheltering in Central Park, the City installed 4 portable washrooms, one handwashing station, garbage pick ups, and hazard sweeps in Central Park, to a cost of more than \$22,000/month. The lack of adequate facilities led to many instances of human waste found on lawns and gardens of nearby housed residents, and despite the high cost to the City are still considered [inadequate based on public health guidelines](#).

In order for the Arena and the Tiny Home Community to be successful and integrate into the community, Central Park must remain a community green space.

North Park understands the importance of providing shelter to those experiencing homelessness and is not “closing the doors”. However, with two locations in a small radius already being used for sheltering (RAP parking lot and the Arena), the neighbourhood cannot accommodate a third location for sheltering, especially one with such high community value as Central Park.

North Park will be providing sheltering locations at the Tiny Home Community (30 beds) and Save on Foods Memorial Arena (45 beds)

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The NPNA has been clear that our support for both projects is contingent on Central Park being permanently removed from the list of parks where 7pm-7am or 24/7 sheltering is permitted.

Studies shows that green space provides greater health benefits to lower socioeconomic status individuals and groups than to the general population

There is consistent evidence that:

- There is a strong positive association between green space and healthy birth outcomes among mothers of lower socioeconomic status.
- Green space may decrease the effect of income deprivation on all-cause and cardiovascular mortality
- There is an associations between green space and reduced mortality are strongest in socioeconomically deprived neighbourhoods, and cannot be explained by increased physical activity

Admission costs for City owned recreation facilities in North Park

Central Park is one of the only parks/recreation facilities in North Park that is completely free to use, as Crystal Pool Save on Foods Memorial Arena, and Royal Athletic Park all charge for events and programming. For low income families, this is essential access to recreation opportunities.

Central Park Land Covenant dictates that Central Park is to be used exclusively for “recreation and enjoyment of the public” in perpetuity

A land covenant applies to Central Park that stipulates that the “City of Victoria shall thenceforth and forever hold the said lands [Central Park] for park purposes and for the recreation and enjoyment of the public” in perpetuity.

Submitted by,



VICTORIA BRANCH
THE BC MUSLIM ASSOCIATION



**The Anglican Church of
St John the Divine**



**FAMILY SERVICES
OF GREATER VICTORIA**



VIRCS
VICTORIA IMMIGRANT & REFUGEE CENTRE SOCIETY