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North Park Neighbourhood Association

PO Box 661, #185-911 Yates Street,
Victoria, BC, V8V 4Y9



City of Victoria
1 Centennial Square
Victoria BC, V8W 1P6
November 25, 2022

ATTN: Sustainable Planning and Community Development Department, c/o Geordie Gordon,
Mayor and Council

CC: NPNA Board, NPNA CALUC
Sent via email

Re: Application to Rezone with Variances 1026-1028, and 1030 Empress Ave. North Park

Dear Mayor and Council,

We are writing regarding the application to rezone with variances the property at 1026-28 and 1030 Empress Ave. in North Park. On October 17th, the NPNA CALUC held a meeting with the applicant, Bowcey Construction, attended by 13 North Park residents and 7 residents from outside North Park to discuss the application.

It is our understanding that the applicant is proposing to: retain a renovated heritage house at 1026/28 Empress Ave. containing 3 owner occupied strata units; demolish an existing older home at 1030 Empress Ave. containing 4 rental units and replace it with a new building with 3 owner occupied strata units plus 3 secondary dwelling units; and build a 6 unit row of townhouses behind these buildings fronting Bay St., for a total of 15 dwelling units.

At both the CALUC meeting, and at the NPNA's monthly meeting held on November 14, tenants of 1030 Empress Ave. were quite emotional in their opposition to the proposal to demolish their homes at 1030 Empress, which currently contains 4 rental suites housing 6 occupants, and replace it with a new structure containing 3 owner occupied strata units and 3 secondary dwelling units.

North Park is one of the City's poorest neighborhoods and the majority of its residents are renters. The loss of any rental properties in today's housing market is cause for concern. In the Community Values Survey done by the NPNA in 2020, North Park residents noted the lack of affordable housing as a major problem, especially for families with low to moderate incomes, and that "any type of affordability is desirable" when it comes to housing.

We are also concerned about the proposal to include 3 secondary suites in the new building at 1030 Empress. It is our understanding, based on the City's definition of secondary suites



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contained in the Land Use Bylaw as well as in the BC Building Code, that secondary suites are only permitted in single family dwellings. Our concern is that the secondary suites could be turned into short term vacation rentals which not only takes away potential affordable housing from the neighbourhood but also diminishes the feeling of community when full time residents are displaced with transient visitors.

North Park is supportive of a diversity of housing and density in our neighbourhood, an example being our support for the current proposal for a high-density rental residential development at 854-880 Pandora Ave., as long as it contains affordable rental housing and does not remove existing housing and displace current residents.

We hope you keep these comments in mind when reviewing and considering this application. Please find attached below additional comments from residents, sent via email to the NPNA.

Sincerely,

Board of Directors
NPNA

Harold Stanley
CALUC Chair

Olivia Moores
Land Use Coordinator



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Comments and Concerns Raised via email to NPNA

Position	Comments
Oppose	<p>I am very concerned about the proposed development at 1026/1028 and 1030 Empress Avenue. Twelve new units is absurdly massive for our little street to absorb. And parking! It's already difficult to find parking spaces for current residents. Three stories is higher than almost all the other buildings.</p> <p>There is another absentee landlord with two properties on the same side of the street next to the small, two-story apartment building at 1010 Empress and I'm sure if this construction is permitted, he will be next to propose gigantic buildings on his property.</p> <p>I realise we need more housing in Victoria, but this is patently ridiculous. Please deny this proposal. Or at least whittle it down to a reasonable level.</p> <p>I am writing to object to the proposed development at 1026/1028 & 1030 Empress Ave.</p> <p>The proposal to increase the density of housing within these sites will negatively impact the other residents of Empress Ave. Street parking is at a minimum already and adding more units will aggravate the issue. The extra traffic from residents and their guests will increase the number of cars travelling up and down Empress, which is already a busy street. Currently, there is no room for cars to pass each other if we meet head on the street. This could be a serious impediment for emergency vehicles that need to access homes in the 1000 block of Empress. In addition, I expect there would be times when the 1000 block of Empress Ave. has to be closed to take delivery of construction materials, connect to services and so on. In the past, this has resulted in my being unable to leave or access my</p>



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	<p>home at my convenience, having to wait until I could be let through by employees. I am very concerned this would be a regular occurrence during the period of construction. I would like to add that parking is prohibited during road closures, preventing myself and others from parking within a reasonable distance from our homes. It will also prevent deliveries from being made, an important consideration in light of the increasing number of delivery services.</p> <p>I also object to being subjected to years of the noise and disturbance of a long term major construction project. Some people in my home are shift workers, and the noise created by the project will prevent them from being able to sleep during the day, as they often have to do. Furthermore, it prevents that peaceful enjoyment of my own property by creating disturbing noise and activity. I am also concerned about damage to my home in the process of blasting and other construction activities that may occur.</p> <p>Finally, creating such dense housing will result in increased pressure on local services and amenities. We have no dog park nearby, a pool/rec center that has been on its last legs for years, and limited access to other green spaces or parks. Adding housing with increased density will add an additional burden to an already crowded and overwhelmed neighborhood.</p> <p>Thank you very much for considering these remarks. I hope you will give serious considerations to denying the land use application and keep Empress Ave. the peaceful environment all of its residents currently enjoy.</p>
Oppose	<p>Hello,</p> <p>This note is regarding the development proposed at 1026/28 & 1030 Empress Ave. The development</p>



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	<p>plans should be rejected for several significant reasons.</p> <p>By approving this proposal you are demolishing perfectly-good affordable housing to develop more UNAFFORDABLE housing.</p> <p>By approving this proposal you are not helping but you are actively contributing to the housing crisis. You are contributing to the loss of affordable housing. You are contributing to forcing more tenants into the rental housing market where they will face an increase of roughly 60% in monthly rent and approximately 75% of their total income.</p> <p>The true housing crisis is the severe shortage of affordable housing. It is not a lack of million dollar townhouses and condos included in the development proposal.</p> <p>Furthermore the houseplex in the proposed design does not actually add any rental units to the market but reduces it by one. 1026/28 had 3 units occupied while 1030 has 4. The majority of units in the development proposal are UNAFFORDABLE strata suites. Once completed the rates for the rental houseplex will likely also be UNAFFORDABLE. It should be required in any proposal that any new rental suites are offered at rent-controlled rates once ready for occupancy. The developer likely wants to demolish the existing building at 1030 simply because of the current rental rates for the building.</p> <p>Currently Empress Ave between Quadra and Cook is already very congested as a high-volume street. Adding this many more units with parking, etc. Will make the block extremely congested and too busy. No one will be able to find residential parking - it is already a big problem.</p>
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	<p>A freeze on unnecessary renovictions such as this one should be implemented for the next few years until any positive progress in correcting the housing crisis is made and the economy settles.</p> <p>A renoviction freeze should be mandatory specifically for a situation such as this where a developer intends to demolish and evict any rental suites that do not immediately require significant renovations for the safety of the tenants, and new development is for sole profit purposes for the developer.</p> <p>This proposal has nothing to do with trying to help the housing crisis, it is simply a matter of greed by the developer who sees an opportunity to capitalize based on the current 'missing middle' initiative which to date has simply been a failure.</p> <p>Please do the right thing and reject this proposal for development.</p> <p>Thank you for your consideration, Concerned residents of Empress Avenue</p>
Oppose	<p>I would like to share my input on Chris Lacey's proposal to demolish affordable housing to build more unaffordable units for profit.</p> <p>It has been devastating to witness the residents of 1026 & 1028 Empress Avenue become evicted from their homes. The anxiety, fear, and hopelessness that they expressed is something that I am beginning to experience myself. Not only do I need to find a suitable home for myself in this impossible rental market, but for my pet as well. A pet that Chris Lacey approved three short weeks before giving me a letter expressing his desire to destroy our home.</p>



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I work for the Victoria Cool Aid Society and have heard countless stories from our clients. They reflect on the housing crisis and how being evicted from their homes (for whatever reason) left them with nowhere to go. A quick glance down Pandora Avenue, or a peak inside any of our local shelters and supportive housing sites, will show you that we desperately need (and have needed) support. PLEASE hear us.

The 1030 Empress house was built in the 1920's and is still full of the character & charm that makes Victoria what it is. There are no issues with the structure, appearance, or affordability of this building. To remove it from the neighbourhood and replace it with an unaffordable modern structure should be a crime.

My neighbours & I are fearful of backlash and understand that if this proposal does not pass, Chris Lacey is still able to find other ways to evict his tenants. Even so, I will fight for affordable housing and healthy communities for the rest of my life.

Aside from the displacement of desperate people, Chris Lacey's project will undoubtedly disrupt the quiet enjoyment of folks living in the surrounding area, add more congestion to the already busy Bay Street, and crowd side streets that are currently experiencing a lack of parking spots.

I don't understand how there is so little protection for our communities and the people who reside in them. I would love to see some integrity from property owners and those of you who are leaders in our beautiful city. My fellow community members and I are asking that you reject this proposal and keep Northpark a place that people are proud to call home.

With all of the hope I can muster,



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Support	<p>I would like to voice my support for this project.</p> <p>The entirety of North Park but this project in particular is ideally situated to support reduced car reliance. I say this as someone who has lived just under a block away since 2005 without owning a car and using a bicycle as my primary form of transportation.</p> <p>The proposed project is close to major bus routes on Quadra Street and Hillside Avenue plus two less frequent routes on Bay Street and Cook Street. It has two grocery stores within walking distance (Fairways and Save On), is close to parks (Crystal Pool but also the park on Blackwood, the park on Wesley, Summit Park, etc.), elementary and high schools and is within walking distance to downtown. It is also on a major bike route, there are medical services nearby including a major hospital and several villages within walking distance (Quadra Village, Fernwood Square, Haultain Corners). I am not sure you could find a more balanced location as far as amenities and services in the entirety of Victoria for car-free living.</p> <p>My only reservations with the project are that I fear it is far too small to have any hope of providing affordable units. I would much prefer to see this become a larger 5 or 6 story project similar to Ross Terrance on Fifth Street or the one around the corner from it on Kings so as to be able to provide some affordable units in the mix as well as family oriented homes.</p> <p>I am exhausted from having friends leaving this neighbourhood and the city in general because of lack of housing and as this project is a small step towards addressing that need, I would be remiss if I did not support it.</p>



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	<p>Please support this project and any similar ones that will help address our housing deficit.</p> <p>Thank you for your time.</p>
Other	<p>I'm writing you regarding the proposed development at 1026-28 Empress Ave by Bowcey Construction. I own a home directly across Bay Street from the development at 2502 Prior St where my wife and I have lived for the last 5-years. I'm very concerned about the many impacts of the proposed development and associated by-law changes on the livability of the surrounding area. While I understand and support the desire for densification, the approach must be guided by existing community needs and attention to both environmental and social wellbeing.</p> <p>I would ask you to consider and explore alternative approaches to address the following issues:</p> <ol style="list-style-type: none">1. Traffic and congestion on Bay St. Over the last 5-years traffic has increased significantly on Bay street which is already under pressure as a main ambulance and transit route. Concurrent construction projects, including replacement of storm drains, repaving and surfacing as well as bike route upgrades have had a compounding effect on noise and air pollution for residents.2. Parking. Adding an additional 6 unit building will significantly increase pressure on street parking in the surrounding area which is already challenging for residents due to the limited number of driveways.3. Removal of existing trees. The proposal will require the removal of two large maple trees in order to maximize the construction footprint of the lot. In a neighborhood with limited green space, maintaining existing foliage should be a priority.



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	<p>4. Solar Impact of the proposed height change. After reviewing the City's own solar assessment studies and calls for more homeowners to participate in alternative energy generation, I have recently invested in solar panels on the Bay Street side of my roof. The proposed development will require a height adjustment to accommodate the 3 story 6 unit building which will have a negative impact on the viability of solar collection and a direct financial impact on my investment.</p> <p>I acknowledge that the City of Victoria is managing a significant shortage of affordable housing and that greater inventory is needed to meet the growing demand. I am not opposed to development but as a homeowner, taxpayer and landlord I would strongly urge you to take a balanced approach. We need to enable densification in ways that manage for existing community services, aging infrastructure and the right of citizens to peaceful enjoyment of their homes and properties. This development appears to be putting profit maximization over people and the environment.</p> <p>I look forward to a response from you outlining what mitigation strategies are possible.</p>
Oppose	<p>I am writing in protest to the development proposal for 1026/28 and 1030 Empress Ave. I live in the 900 block of Empress Ave. and are concerned about the development proposal in the next block.</p> <p>I notice that even though the development has not been approved, work has already commenced with the character front stone wall smashed, the stone chimney removed and some of the outside cladding removed.</p> <p>As with several other developments proposed or already underway, the lack of parking is making a</p>



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	<p>crowded street even more congested. The scale of the development is much larger than any other in the neighbourhood. I happen to like old houses and to see both houses disappear makes me sad, particularly, 1026/1028 which is a character house with stone. The proposal wants to renovate that house but with the work already done it will not be the same. The two blocks of Empress have slowly been changing as 2nd suites and additions have enlarged the housing stock but still have kept the neighbourhood feel without huge developments.</p> <p>I hope that this proposal will not be approved, although it is too late to preserve the interesting house at 1026/1028.</p>
Oppose	<p>-This project will add far too many units to this already dense street. The street is congested with vehicles and there is not enough street parking as it is.</p> <p>-The developer is using empress avenue for all vehicles to enter and leave this project and thus puts far too much strain on this narrow congested street. Think of service and emergency vehicles going to this development causing so much congestion and chaos for the rest of the residents on empress avenue. Bay Street is much wider and able to carry the load of the excessive traffic this development will bring to our street.</p> <p>-This project will turn this peaceful neighbourhood into a loud, disturbing, and frustrating place especially during years of construction. We will be unable to live and work peacefully from our homes and this will affect the well being of all of use, renters and home owners.</p> <p>-These large houseplexes are large and very unpleasant to look at. None of the buildings on this street have this large footprint and lots and lots of</p>



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	<p>concrete and asphalt adding to the heat of the neighbourhood in the summer.</p> <p>-I live in a duplex which to me is the so called missing middle. It would be much more appealing for the developer to consider duplex and triplex building which fit in with the neighbour hood .</p> <p>-I am strongly opposed to the demolition of perfectly good and affordable rental housing. 1030 empress is in good condition and it is wasteful and environmentally damaging to destroy good housing. And this is happening all over in Victoria especially over the last 9 years.</p> <p>-The siding on 1030 empress looks like it contains asbestos. The city needs to assess the level of asbestos and other toxic materials that the developer will be spewing into the neighbourhood and ensuring that any demolition is done properly .</p> <p>-This neighbourhood has the highest proportion of subsidized housing, low income housing, homelessness , drug use , crime and it is not going to be improved by overloading small lots with houseplexes. This also will not result in more affordable housing or affordable rental units.</p> <p>-The city had done nothing but develop and build for the past 9 years. Many of the condos , duplexes and single family homes are not available for sale or rent to residents because they are being used for air b/b. And this city has no capacity to deal with this problem. Stuffing a whole lot of people into small city lots by building houseplexes could also be a huge mistake. It certainly makes this city more unlivable.</p> <p>-Finally the developers have had almost free reign to do what they want in neighbourhoods. It is time that</p>
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	residents of the neighbourhood have their concerns addressed.
Oppose	<p>Hi there,</p> <p>I would like to express my disapproval of the proposed housing development at 1026/1028 Empress Ave. I would like to keep the charm of the neighbourhood with the older homes and multi units within them. We also do not have any more room for cars, and the bike lane down the road is already a challenge.</p> <p>Thank you for your time,</p>
Oppose	<p>This is an email to voice my disapproval of the proposed project for our neighbourhood (1026/1028 Empress).</p> <p>Adding density to the city is a good aim, but the proposed jamming in of town houses is not the way to do it. The idea of having cars drive between the houses and park in what is now the middle of the backyard is absurd, and cheapens the character of the neighbourhood.</p> <p>When we vote for added density, we don't mean to give developers free-reign to build unsightly buildings that do not fit with the neighbourhood.... The two houses that are there are both already high density - they are multi-unit homes that were wonderful homes for people who are now evicted. This project has already disrupted my beautiful Empress community.</p> <p>I also want to voice my concern that the two houses 1024 Empress (which is my home) and the house behind it (1025 Bay) are threatened to get sandwiched between two development projects on either side (The owner on the other side owns 1020 and 1022 Empress, which are double lots). -- If this project goes through, North Park is letting small developers create</p>



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irreparable disunity within the city: tall Multiplex units spanning multiple lots, and the little character homes forever stuck between them. If you actually think that the multi-unit housing on this street isn't enough, you need to develop the whole street holistically, not just two lots at a time -- it otherwise creates these crazy proposals that aren't practical, look terrible, and make the neighbourhood worse.

As a home owner, I bought my house just 2 years ago because the neighborhood had character and community. -- These projects are threatening that, replacing already high density housing with way too much density for the street, aesthetically and practically (We just don't have the space for more cars. And there is no way those town house owners aren't going to try parking on the street...)

Thank you for reading my disapproval of this project.