

Re: 3327 Richmond Road and 1910 Argyle Avenue - Proposal for 4 lot subdivision – site specific zone

Concerns regarding the application are identified as respecting the policies of the Shelbourne Local Area Plan, the Environment, location and safety, and neighbourhood context.

The application does not meet the following requirements:

- Policy 6.8 in the Shelbourne Local Area Plan states that the zoning on the properties on the Mt. Tolmie Slopes is to be maintained as a minimum RS-12 parcel size. The two properties being requested for rezoning are in the Mt. Tolmie slopes. The site specific zone being applied for does not meet the Mt. Tolmie slopes policy 6.8.
- The RS-12 zoning put in place in 1990 has allowed for increased density and sensitive infill while maintaining the character of the RS-12 community.
- The rezoning being requested is a site specific zone due to the number of variances required.
- It does not meet the requirements of the subdivision bylaw for lot size, width, depth, setbacks and access. The building envelopes have flipped the front and rear.

The application is deficient and incomplete.

- It does not include a tree plan.
- It does not identify the access to proposed lot #1 fronting Richmond Road or proposed lot #4 fronting Argyle Avenue.
- It does not include building elevations or streetscape.

Environment:

- The properties are environmental significance in biodiversity and connectivity to the Garry oak ecosystem of the Mt. Tolmie slopes area.
- The Garry Oak Meadow Preservation Society identified 8 significant Garry Oak trees on 1910 Argyle Avenue.
- The Garry Oak Meadow Preservation Society identified 10 significant Garry Oak trees on 3327 Richmond Road.
- Both properties have been identified as being part of the prehistoric glacier rock formations that form Mt. Tolmie and extend southwest across Richmond Road to what is commonly called “Snake Rock”.
- Due to the rock formations there is no vehicle access to lot #4. Significant blasting would be required to create driveway access and a building envelope.
- Due to the rock formations on the north east side of lot #2 blasting would be required to create a building envelope.

Location and Safety:

- The proposed property rezoning on Richmond Road is situated at an extremely dangerous blind curve. The curve on Richmond Road is at the base of a steep hill intersected by Argyle Avenue which is below grade.
- The road edge is unfinished with a dirt path worn by pedestrians and cyclists. It is extremely dangerous.
- Access at present to 3327 Richmond Road is by a single driveway and a turnaround at a garage at the rear of the property.
- Access at present to 1910 Argyle is by a one way easement off Richmond Road to the building on the rear of the property.
- The property at 3311 Richmond Road has legal “forever rights” to access the easement. Any change to this access point would have to be two way to insure unfettered access to 3311 Richmond Road.
- The two present access/egress points although parallel are separated a large treed and landscaped garden.
- The proposed location for the two panhandle access/egress is at a historic location for automobile accidents. Automobiles miss the curve when coming down the hill and careen either into the oak grove or the power pole. An 18 year old female was killed at that location in the 1990’s.
- The proposed location of access/egress to 1910 Argyle Avenue would be directly across from and in conflict with Camosun College’s daycare access and loading docks.
- There is no street parking on Argyle Avenue or on Richmond Road.
- There is residential parking only on the side streets.
- Sidewalks are on the west side of Richmond Road only from Lansdowne Road to McRae Avenue.
- The east side of Richmond Road is not walkable. No sidewalks on Argyle Avenue or any of the side streets.
- It is a dangerous and challenging neighbourhood for cycling due to topography and no bike lanes.

#### Neighbourhood Context:

- The properties proposed for a site specific rezoning are in the shadow of the Saanich heritage registered Provincial Normal School now Camosun College. Within the surrounding streets are no less than a dozen Saanich heritage registered and designated properties.
- The neighbourhood is diverse with housing from the early 1900’s to more recent infill developments done within the RS-12 zone.
- 1910 Argyle Avenue was the summer cottage of the headmaster of the Provincial Normal School. The building at the rear of the property was the original barn. Should these buildings be destined for demolition the heritage values must be documented and recorded with Saanich Archives.
- The neighbourhood is a stable well maintained vibrant residential neighbourhood.
- It’s a very car oriented neighbourhood due to the lack of amenities and the Mt. Tolmie slopes. Closest shopping is Hillside Shopping Centre or Foul Bay Centre. All uphill or downhill.

- Bus service is convenient taking one directly to downtown Victoria or to UVic. Not direct to shopping centre at Hillside or Foul Bay.

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