

Response to Community Referral Package

Received July 25, 2025 by Cordova Bay Association for Community Affairs

To: Saanich Planning Department

Attention: Andrea Pickard

Date: September 30, 2025

Subject: Response to Community Referral Package of July 25, 2025

This document provides a formal response to Development Application **Folder Nos.: DPR01092; REZ00798; SUB00972**, submitted by **ARAGON (CORDOVA BAY) PROPERTIES LTD. – PETER CENSORIO TO REZONE FROM M-2, P-4 AND RM-3T TO A COMPREHENSIVE DEVELOPMENT ZONE FOR A MULTI-PHASED COMPREHENSIVE DEVELOPMENT WITH A MIX OF LOW-RISE TOWNHOUSES AND ROW HOUSES AND MID-RISE MULTI-FAMILY RESIDENTIAL BUILDINGS WITH COMMERCIAL RETAIL, OFFICE AND DAYCARE USES.**

The Cordova Bay Association for Community Affairs:

☒ **Objects to the application**

Additional Comments:

Our primary objection to the proposed Aragon development is its lack of fit into the semi-rural, village, seaside character of Cordova Bay due to its overall size, scale and density. The proposed Aragon development raises significant concerns about traffic impacts and the need for improved transportation infrastructure, parks, community spaces and amenities.

The Cordova Bay Association for Community Affairs (CBACA) welcomes sustainable development in Cordova Bay that will bring needed housing to the municipality and region. We welcome a mix of building and ownership types, including affordable and below-market housing options, that will fit with the suburban, semi-rural and wooded character of our seaside Cordova Bay village and be compatible with municipal plans for active transportation, traffic safety, parks, community spaces and amenities.

We have reviewed the proposed Aragon development with reference to:

- Cordova Bay Local Area Plan, Adopted March 22, 2022.
- Sustainable Saanich Official Community Plan, Adopted May 7, 2024.
- Active Transportation Plan, December 2023.

- Road Safety Action Plan, October 2024.
- BC Transit, Broadmead – Cordova Bay Local Area Transit Plan, November 2021
- Two public presentations by Aragon in November 2023 and November 2024.
- All publicly available Aragon development reports and plans.
- Submissions from and consultations with community members.
- A canvas of the local business community.

1. Overall Size, Scale, Density and Lack of Community Fit

Cordova Bay Context

Cordova Bay's land use is a mix of suburban, rural-residential and agricultural, with a small village area in the heart of the community. Cordova Bay is unique in Saanich, being made up of both suburban and rural lands, and a population of just over 8,100 people according to the Local Area Plan.

Cordova Bay is known for its natural features, beaches, treed walkways and trails, and its small seaside village character.

Cordova Bay is a community by the sea known for its great natural beauty, vibrant walkable Village, diverse range of housing types, beaches and public spaces that is enjoyed by people of all ages and backgrounds who celebrate and honour a true, rich history. –Vision Statement, Cordova Bay LAP, 2022.

More than 80% of the community members who participated in the LAP planning process strongly supported a vision for Cordova Bay that included:

- A strong village and public places to gather
- Housing for a diversity of people
- A place of great natural beauty
- Improved walkability and better pedestrian experience
- Low impact from traffic
- Efficient public transit
- Less car dependency
- A scale that is “village-like”
- Vibrant shops
- Preserving the village, rural, beach character.

The Local Area Plan sets out a clear, community-enhancing objective for future development in Cordova Bay.

... that the development integrates well into the community and provides a mix of housing types and community uses. --Cordova Bay LAP, 2022, p 35.

Proposed Aragon Development

The proposed Aragon development is large, dense and urban in character. The proposed 1,160 units could increase the population of Cordova Bay by 2,500 to 3,000 people, a 30-35% increase.

- It contains 29 buildings in a 26-acre concentrated block, including three proposed at 11 storeys and two at 10 storeys, which are out of scale for the village, rural residential, seaside character of Cordova Bay.
- Almost every buildable square foot to the edge of Cordova Bay Road is covered with buildings and roads. Some protected trees on the perimeter and two small parks offer the only green space.
- The built area provides little allowance for shade or tree cover.
- It offers few gathering places for an additional 2,500 to 3,000 residents.
- The proposed 1,160 increase in households and an anticipated 2,500 to 3,000 increase in residents will have immense impacts on surrounding streets and roads, transportation, traffic, pedestrian and cycling safety, parks, community facilities and amenities.

Saanich Redevelopment Guidelines for the Trio Site

There is language in the OCP and LAP for redevelopment of this site as a master planned community.

The Saanich OCP identifies the Trio site for a significant redevelopment with buildings over four storeys.

7.4.11 Notwithstanding the Neighbourhood designation, support building heights above four storeys at 773 Cordova Bay Road (Trio site) subject to a comprehensive redevelopment plan. —Saanich OCP, 2024.

The approved Cordova Bay LAP includes, as a key direction, a mix of housing at Trio site.

Objective C: Support redevelopment of the former Trio site to include a range of types and tenures of housing and community amenities. —Cordova Bay LAP, 2022.

The CBACA accepts this conceptual development framework, but the proposed Aragon development does not meet the guidelines for the redevelopment of the Trio site set by Saanich in several policy areas.

The community expects, however, development of the Trio site to meet the clear guidelines for maximum building heights as detailed by Saanich in its updated OCP future land use designations:

- Four to six storeys, but only if along a primary corridor or frequent transit network, in “villages” or in “neighbourhoods or neighbourhood hubs.”
- Not exceed building heights in the OCP exceptions list.

- Not concentrate taller buildings away from the focal point of the community.

The proposed Aragon development does not meet these guidelines.

- It is not located on a primary or secondary road corridor, and is not in the Uptown Core, a Centre or a Village.
- It is not in an OCP Primary Growth Area.
- It is not located within a frequent transit network area, and is not a neighbourhood hub as outlined in the OCP's future land-use designations.
- The tallest building at present in Cordova Bay is the 8 storey "Pinnacle" on Sayward Hill, which was granted an OCP policy height exception.
- It contains taller buildings of 10 and 11 storeys that are unprecedented in Cordova Bay, and are not located within or adjacent to the existing village area.

Lack of Tree Cover and Treed Buffer Zones

The drawings provided for the proposed Aragon development show townhouses nearly to the edge of the property with a single row of trees along the frontage as a result of the overall size, scale and density of the proposed development. This doesn't allow for the tree cover and wide, walkable, treed buffer zones that front other developments along Cordova Bay Road. Examples include Mattick's Woods, 5110 Cordova Bay Road, 5152 Cordova Bay Road, and 5187 Cordova Bay Road: large residential and townhouse communities barely visible from Cordova Bay Road because of setbacks, tree cover and treed buffer strips that all contribute to the great natural beauty of Cordova Bay envisioned in our Local Area Plan.

Development on the Trio site that includes a generous setback from Cordova Bay Road and a wide, natural treed buffer zone to offset the hard urban edge of buildings would more closely fit the look and feel of Cordova Bay and align with community expectations.

2. Transportation and Traffic Deficits

Transportation Network Area Context

The Cordova Bay LAP sets the context for the transportation network.

Cordova Bay's distance from urban centres, and the adjacency to the rural area provides a quiet, tranquil environment but also provides some challenges with limited pedestrian and cycling facilities, a reliance on motor vehicles, and infrequent transit service. Further, the steep topography and curvilinear road pattern limit travel options funnelling traffic on only two key north-south routes: the Pat Bay Highway and Cordova Bay/Fowler/Sayward Road Corridor. – Cordova Bay LAP, 2022.

Apart from the Cordova Bay/Fowler/Sayward Road corridor, streets in Cordova Bay are residential. Many near the proposed Aragon development are outside the Urban Containment Boundary (UCB).

Streets Unable to Handle Expected Increase in Traffic

The adjacent residential streets cannot manage a significant increase in traffic. The proposed Aragon development is on the eastern edge of the Urban Containment Boundary; the adjacent residential properties are rural and include rural-residential streets such as Alderley Road and Santa Clara Avenue. These are characterized by narrow road surface widths, open ditches, no road shoulders or sidewalks, and minimal street lighting. Because they are outside the UCB, these streets are not designed for the traffic levels accompanying urban-scale development, and they are not identified for infrastructure improvements in either the 2022 LAP or 2024 ATP. These rural-residential streets are not suited to carry the increased traffic expected from the proposed Aragon development.

Sayward Road, part of the Cordova Bay/Fowler/Sayward road corridor, is also outside the UCB. As a result, it has limited pedestrian and cycling infrastructure such as sidewalks, pedestrian crossings and bike lanes. It will not be able to safely accommodate the expected increase in pedestrian, cycling and vehicle traffic resulting from the proposed Aragon development.

Minimal Existing Transportation Infrastructure

The proposed Aragon development, located at the northern section of Cordova Bay, exacerbates the existing lack of safe active transportation infrastructure, particularly along Fowler and Sayward Roads. Neither offer consistent pedestrian or cycling infrastructure: some sections feature some sidewalks and/or bike lanes, while others lack road shoulders and run beside open ditches.

Saanich's 2024 Active Transportation Plan (ATP) acknowledges that Cordova Bay is already in a pedestrian-safety infrastructure deficit with recognized shortcomings for sidewalks when compared to other areas of Saanich.

Walkscore.com gives Cordova Bay a low walkability score of 21 to 58 rating out of 100 with only some transit. At present, and due to the lack of investment in pedestrian and cycling infrastructure and transit, Walkscore.com deems Cordova Bay to be a car-dependent community, counter to the LAP vision for the community.

Many roads in Cordova Bay cannot safely absorb the expected increase in pedestrian, cycling and vehicle traffic from the proposed Aragon development, and there are significant safety concerns from the expected increase in heavy-vehicle traffic during the construction phase.

Ongoing Delays in Infrastructure Improvements

The scale, size and density of the proposed Aragon development exacerbate the need to accelerate pedestrian, cycling and vehicle traffic infrastructure improvements in Cordova Bay.

The new regional pickle ball facility at Fowler Park, scheduled for completion in 2026, will increase vehicle traffic along Cordova Bay, Fowler and Sayward Roads, and will also increase pedestrian and cyclist traffic. There is limited pedestrian and cycling safety infrastructure along Fowler and Sayward Roads to safely and comfortably access this “new” park. The Aragon development magnifies this issue for new residents trying to access this park and adjacent Lochside Trail.

The Cordova Bay LAP outlines the expected design concepts for pedestrian—sidewalks, pedestrian crossings—and cycling improvements along the Cordova Bay/Fowler/Sayward corridor. The ATP sets out the targeted infrastructure improvement timelines for these roads, with capital investments generally planned for 2040 to 2045.

Budget restraints within Saanich may further delay key infrastructure improvements in Cordova Bay. Mayor Dean Murdock indicated that “they may be able to find savings by extending the long-term buildout for infrastructure replacement or slowing down some projects” –Victoria Times Colonist, September 15, 2025.

Despite strong alignment in the OCP, LAP and ATP policies around active transportation and road safety, appropriate and long overdue pedestrian and cyclist safety infrastructure in Cordova Bay is currently delayed. The size, scale and density of the proposed Aragon development will further add to the existing pressures on our community due to delayed implementation of these critical projects.

Poor Transit Service and Infrastructure

Cordova Bay is poorly served by the existing BC Transit service and infrastructure, such as transit shelters and bus pullouts. Transit service and infrastructure do not meet the community’s current needs, and are inadequate to meet the increased transit needs of the proposed large-scale Aragon development.

Although BC Transit is proposing an additional transit route along the Ridge as a long-term priority, this service can’t be implemented until some road widths along the street network in the Ridge area are improved. No other improvements are currently proposed for transit service in Cordova Bay.

Without improvements to transit service and pedestrian and cycling infrastructure, Cordova Bay will continue to be a car-dependent community. The traffic impacts of the projected 1,500 to 1,700 vehicles expected as a result of the proposed Aragon development will further magnify this issue.

Impact of Massive Traffic Increase

The high density in the proposed Aragon development will have significant negative impacts on the currently inadequate road network, and for safety on the existing pedestrian and cycling infrastructure.

We have reviewed the July 25, 2025 version of the Traffic Impact Assessment for Aragon's Trio lands development in Cordova Bay and have no confidence in its findings and recommendations due to several errors, omissions and misrepresentations of the community transportation network. Our concerns on this report were outlined in September 7, 2025 letters to Troy McKay, Senior Manager of Transportation and Development Division and Andrea Pickard, Planning Department, of the District of Saanich, and to Peter Censorio at Aragon Properties.

The Cordova Bay/Fowler/Sayward Road corridor is the only main road through Cordova Bay. It is not a "primary or secondary corridor" as designated by Saanich in the OCP. It is not designed to, and does not have the capacity to, manage the large traffic increase from adding the proposed 1,160 households, comprising up to 3,000 residents driving 1,500 to 1,700 vehicles.

The intersection at Hwy 17 and Sayward Road is already one of the most congested highway intersections and has the worst accident rates on Vancouver Island. The significant traffic increases that can be expected from the proposed Aragon development will multiply the problems many times over at this intersection and along Sayward Road leading from the highway.

3. Parks Deficits

The Cordova Bay LAP sets out the context for the importance of parks, trails, beaches and natural areas in Cordova Bay.

The parks, trails and beach areas of Cordova Bay are an essential part of the neighbourhood's character, history, culture and appeal. —Cordova Bay LAP, 2022.

The current quantity, capacity, condition and type of public parks and park facilities in Cordova Bay will not meet the increased needs for park facilities resulting from the large, proposed Aragon development.

Insufficient Park Space

The two small parks in the proposed Aragon development will not address the shortfall in park space in Cordova Bay, and are not adequate in size for a development that can expect 2,500 to 3,000 residents.

Measured against Saanich OCP policy, Cordova Bay is already short of park space, a shortfall also highlighted in the Cordova Bay LAP.

Moreover, the two parks in the proposed Aragon development do not include sufficient green space or dedicated space for dog walking or play areas. This shortcoming of the proposed Aragon development will overload the adjacent parks and beaches in Cordova Bay as residents seek recreation spaces for themselves and their pets.

Inadequate Park facilities

Park facilities immediately adjacent to the proposed Aragon development, such as Lochside Park and Sayward Hill Park, are currently not adequate to meet the needs of the changing community, and cannot accommodate the future needs of the proposed large-scale Aragon development.

Sayward Hill Park, immediately adjacent to the Aragon development, already requires upgrades to the trail system to accommodate increased trail use and the changing needs of the surrounding community. The increase in usage from an additional 2,500 to 3,000 residents will quickly degrade the existing park and trails without a significant, ongoing budget commitment for facility renewal, trail upgrading and maintenance.

Nearby Lochside Park will become a focal point for the residents from the Aragon development. The Cordova Bay LAP highlights the existing need for renewal investments in Lochside Park: its facilities are outdated and failing, they do not meet the diverse and evolving needs of the Cordova Bay community, and they are not well integrated with the Lochside Trail bisecting the park. Lochside Park already requires a park renewal plan, and the expected impact from the proposed Aragon development heightens the need for investment in renewal and maintenance.

No Area-specific Park Plan

There is currently no area-specific park plan for Cordova Bay. The proposed large-scale Aragon development would require a reassessment of the park space allocations and facilities throughout Cordova Bay to accommodate the 30 to 35% expected increase in population.

4. Community Space and Facilities Deficits

Cordova Bay needs more smaller community facilities to meet current and future demand.

Cordova Bay is short of community space. The Cordova Bay 55 plus organization is at capacity with about 1,000 members. In addition, the Cordova Bay LAP highlighted *“shortages for daycare space as well as space and programming for youth, younger adults and families.”*

Existing groups, such as 55 Plus, have limited options for accessing more space in the community: Cordova Bay Elementary School is maxed out for space, and the faith-based community facilities are already accommodating various activities with limited opportunities to expand their facilities as they grapple with funding issues due to lowered member populations.

The estimated 2,500 to 3,000 increase in population resulting from the proposed Aragon development will bring more seniors and families to Cordova Bay, resulting in even greater demand for community spaces for recreation and socialization.

According to Aragon's Trio Lands-Rationale letter included with their development application, Aragon intends to provide "Indoor common space for resident use and to share with the wider community." The amount of space was not specified but does not appear sufficient to handle the significant increase in the population and diversity of needs that this development will bring to Cordova Bay.

5. Community Amenities, Services and Supports Deficits

The proposed Aragon development allocates space for a café, a daycare centre and potential retail/commercial use. However, its location on the Northern edge of Cordova Bay village means residents will need to travel to access existing amenities available in the village, such as the elementary school, pharmacy, dentist and retail offerings at The Haro.

Cordova Bay currently doesn't offer the essential amenities, services or community supports that the residents of the proposed Aragon development will need such as a large, full-service grocery store, health clinic, library or recreation centre. As a result, the 30 to 35% expected increase in population will need to drive to or rely on Cordova Bay's infrequent public transit to access essential amenities, services and community supports in other areas of Saanich.

Goal #4 of the Saanich OCP Land Use Plan is **Make Saanich a 15-minute Community** where all households within the Urban Containment Boundary are within a 15-minute (or 1.2 km) walk of key amenities that support daily living. These amenities include:

- Diverse housing choices
- Mixed income housing
- Lifelong learning opportunities
- Schools and childcares
- Public transit
- Cycling networks
- Pedestrian friendly design
- Cultural facilities
- Recreational facilities
- Gathering spaces
- Parks and playgrounds
- Natural areas

- Employment opportunities
- Health services
- Food access and retail services.

Cordova Bay already has major deficits in many of these service and infrastructure areas. Adding a large-scale urban development to the community will only exacerbate the problem and not move the area towards the stated OCP goal of a 15-minute community.

Conclusion

The updated Saanich OCP and Cordova Bay LAP envisioned a master-planned development for the Trio site that would feature a mix of housing types and ownership options that would fit with and enhance the surrounding Cordova Bay community.

Cordova Bay Association for Community Affairs welcomes the many positives that can come from development in Cordova Bay that offers a range of housing types, including a mix of ownership options and affordable housing options, that increases the population base to better support local businesses, and that increases and enhances community amenities.

While the proposed Aragon development offers a mix of owned housing types—townhouses, and multi-unit strata buildings of five to 11 storeys—as well as rental units, the proposed density of 1,160 households features primarily apartment-style living for individuals, couples and families in 29 buildings that will largely cover the site with little allowance for tree cover, and offers only two small parks for an expected 2,500 to 3,000 residents. This level of density with building heights exceeding the single building height granted in Cordova Bay for an OCP exception will not integrate well with the existing community.

The existing municipal infrastructure and services for roads, pedestrians, cyclists, parks and community space in Cordova Bay do not have the capacity to handle adding this large-scale development at this level of density. Existing transit service and infrastructure are woeful. The current Active Transportation Plan schedules upgrades in Cordova Bay for completion in 15 to 20 years, a timeline that will not meet the needs of the significantly increased population and vehicle traffic consequences of the proposed Aragon development.

Many, if not all, areas of Saanich are in increasing need of updated municipal infrastructure, services and support. Given the economic realities affecting the District of Saanich, the District's ability to keep pace in providing the necessary infrastructure for large scale developments, in any neighbourhood, will be a huge challenge.

The size, scale and density of the proposed Aragon development will significantly add to this challenge. It also does not fit with the vision of Cordova Bay as set out in Saanich's OCP and the Cordova Bay LAP. This application should not be approved.