



Mayor Alto and Council
City of Victoria
No.1 Centennial Square
Victoria, BC

October 30, 2024

Re: 603 Pandora - Rezoning and OCP Amendment

Dear Mayor Alto and Council,

The DRA LUC has reviewed the drawings for the proposed site and hosted a CALUC meeting on February 20th, 2024 for the above-mentioned application. The presentation was conducted by Francis Mairer of Mairer Hotels and Erica Sangster of D'Ambrosio Architecture. This property has been under various development applications for many years and modest amounts of additional density above OCP maximums were previously awarded by Council subject to specific requirements to rehabilitate the heritage building that stood on the site. The heritage building was subsequently destroyed by arson and so the entitlements for the additional density awarded to the previous approvals were extinguished.

Based on the information presented by the applicant, the purpose of this Rezoning is to create a 198 room 12-storey hotel building with commercial space on the ground floor fronting Government Street. The project is requesting an increase of 158% in permitted height from 15.0m to 38.64m and an OCP amendment to increase the maximum allowable density 129% from 3.0:1 to 6.89:1. 123 parking stalls are proposed for the project. The building would be prefabricated out of province and components erected by crane. Shadow studies were provided at the public meeting.

Comments and concerns raised at the Land Use Committee public meeting are as follows:

- Several members of the hotel and business community spoke in support of the project citing the need to create new hotel accommodation for downtown to replace the recent loss of hotel rooms due to redevelopment and conversions of several existing downtown hotels by the province to create shelter space and the prohibition of AirBnB by the city and the province. Business community members expressed concerns regarding the decline in security and vitality currently being experienced downtown and expressed support for this proposal as a solution.
- Several local residents stated that what is being proposed is a huge departure from what was previously approved on the site and that the building is too tall, too dense and

unattractive and would have negative impacts on the Old Town District and the tourism generated by the attractiveness of our heritage precinct

- Several comments that the applicant hasn't demonstrated how this project complies with the basic requirements of the OCP, DCAP and the Old Town Design Guidelines. "What's the point of those policies if you can allow a building that just runs counter to all of the principles? It's just radically different than what has made this neighbourhood attractive for all of these tourists, for residents."
- Comments that other hotels have been built that comply with the guidelines such as the Magnolia and the recently rehabilitated Rialto.
- Concerns that economic development shouldn't be the only priority "this is the most egregious application seen in Old Town for 20 years". "you have to separate out that economic development, because this hotel could be built on the Capital Iron lands where that kind of height is allowed, and you'd still be in that area"
- The applicant justified the height and mass of the building as similar to the Belmont Building at Government and Humboldt and that this project would provide a "bookend" to Government Street. Attendees pointed out that the Government Street precinct ends at Chatham Street, three blocks further north.
- This proposal is located immediately opposite the entrance to Victoria's Chinatown, a federally designated National Historic Site.

The public meeting presented public feedback focussing on two opposing points of view with attendees from the hotel industry commenting favourably on the economic development aspects of the proposed building and the potential for this development to improve security on the streets and the majority of attendees presenting concerns regarding negative impacts on the form and character of Old Town and the potential negative impacts for our tourism industry downtown. The applicant has made efforts to justify the project by quoting general OCP policies relating to economic development, however the most basic and important OCP, DCAP and Old Town Design Guidelines policies regulating height, density and form and character appear not to have been addressed or justified.

The OCP, DCAP and Old Town Design Guidelines provide clear guidance for development within our world-recognized heritage resource that is Victoria's Old Town. The proposal for this site appears to contravene the most basic and essential requirements of our core planning bylaws. Economic development alone appears a weak argument for permitting a proposal that will certainly degrade the heritage value of such a historically important part of our city and the essential engine of the local tourist industry. The DRA LUC feels it appropriate that Council decline the application in its current form due to the application's non-compliance with multiple key planning policies.

Sincerely,

Ian Sutherland, Co-Chair
Land Use Committee Downtown Residents Association