



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

September 29, 2018

**Re: Northern Junk - Rezoning**

Dear Mayor Helps and Council,

The DRA LUC has reviewed the drawings for the latest version of the proposed building and hosted a CALUC meeting on December 12, 2017 for the above-mentioned application. The presentation was conducted by Jon Stovell of Reliance Properties. The meeting was sparsely attended by the public; perhaps explained by how close the meeting was scheduled to the Christmas holidays. This application has been underway for many years and has been revised several times.

Based on the information presented by the applicant, the purpose of the Rezoning is to create an 8-storey market condominium building with ground floor commercial space fronting Wharf Street and the Johnson Street bridge southeast plaza. The two heritage buildings and the property they stand on is owned by the applicant and is proposed to be amalgamated with a larger adjacent parcel of public property that will be purchased from the City of Victoria upon successful rezoning. The applicant is seeking a site specific zone that provides an increase in height to 29m from the OCP and DCAP limits for height within Old Town of 15m. The presentation consisted largely of massing drawings with no cladding or fenestration details yet available.

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

- When questioned about exterior cladding materials in the absence of material boards at the CALUC meeting the applicant stated they had committed to a combination of natural stone, brick masonry and a glass/metal panel system.
- It was asked if there was going to be a pub proposed on the premises. The applicant responded that there would be opportunities for some form of food and beverage outlet within the property but there were no specific plans for a pub.
- It was asked how much off street parking will be provided. The response was 58 parking stalls for a total of 108 units; so about half of the units will have parking.
- It was asked what is the average unit size. Response 500-1300 sq ft.
- There was a general discussion about the bike lanes and the effect on the project.
- When asked about the future of the marina, the applicant stated they would lease the waterlot from the GVHA and rebuild the docks for moorage rental.

Comments and concerns raised by committee review of the drawings are as follows:

- Upon review of the latest drawings provided since the CALUC, it was commented that there is a good range of unit sizes and choice of materials and finishes.
- This project, with each iteration, has become less attractive, likely cheaper to build and certainly less friendly with each new version.
- This is an 8 floor wedge - a very simple proposal. It does not attempt to modulate height to relate to the lower scale of most of its neighbours. It is considerably more massive than the Janion. The western façade takes over the waterfront assertively and regrades the site.
- The proposed parking is significantly below the parking requirements of Schedule C and Zoning Bylaw 2018. Parking needs be provided in accordance with the regulations that have been recently updated to reflect actual evidence based parking data collected for Victoria.
- The significant variance from OCP and DCAP requirements for height within Old Town from 15m to 29m is also necessary to fit the majority of density proposed for the site onto the area currently unoccupied by the heritage buildings.
- The City of Victoria is giving up public waterfront land at our most obvious gateway into downtown, potentially creating one of the largest properties in Old Town for the sole benefit of a large Vancouver developer who requires large projects of this scale to fulfill its business model.
- The decision for the sale of public property to the applicant was made by Council without public input several years ago. Neither the applicant nor the City has demonstrated that this project represents the highest and best use of public land, and the sale has been presented to the public as a fait accompli.
- The rationale to support the sale of a significant parcel of public land on the waterfront in order to facilitate the rehabilitation of the heritage buildings is not compelling. If the City chooses not to sell public land to the developer, the existing heritage buildings would still be rehabilitated in some form as a stand-alone project (though not necessarily by the current applicant).
- There are ongoing concerns regarding the massing of this building. It is only by allowing the amalgamation of city owned property with the current privately owned Northern Junk heritage site can a project of this massive size be achieved. Kept separate, the city owned lands would yield a significantly more modestly sized building more in keeping with its neighbours and Old Town. Heritage buildings are routinely rehabilitated throughout Old Town without the kind of stimulus sought with this application.
- Much needed usable public space for downtown, promised as part of the Johnson Street bridge approaches, has been all but eliminated through poor design and cynical manipulation of the public consultation process. The sale of public lands in this prime location when there is an obvious need for open usable public space is counterintuitive. Funds to purchase the lands needed in the near future for downtown open space will no doubt be unavailable and this prime opportunity to create needed usable public space will be gone. If Council proceeds with this sale of public lands, 100% of the proceeds should be committed to the purchase of other public open space within downtown.
- It is inappropriate for this application and the sale of public lands connected to it to be referred to public hearing by a Council that will not be the same Council in place to adjudicate it at Public Hearing. This application should be tabled to allow the new Council to fully review and assess the merits of this proposal that includes the sale of public land at Committee of the Whole.

Many of the DRA LUC concerns are not focussed on this application in particular but reflect the concerns about the overall direction being taken by Staff and Council in dealing with development applications in Downtown in general and Old Town in particular. Staff have frequently ignored key requirements of the recently updated foundation planning documents and design guidelines in their support of many recent land use applications. Likewise, several members of Council have provided their vote of approval in spite of the contraventions of the newly updated bylaws. As a result, the DRA Board has adopted policies to support the adherence to the requirements of our foundation planning documents unless there is a compelling rationale to do otherwise.

A height relaxation of effectively double of what is allowable in order to accommodate density transferred from an adjacent site through property amalgamation is not considered a compelling rationale. The 15 metre height limit is clearly mandated by the OCP and DCAP and is integral to the protection from erosion of our world recognized heritage resource that is Victoria's Old Town. Schedule C has also been updated as of this year and it is expected that these new parking regulations be also upheld. The rapid densification that the downtown is currently experiencing highlights the deficit of much needed public space in the area. The sale of public property on the Victoria Harbour front for private development in the form as proposed would appear to be not in the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ian Sutherland', with a stylized, flowing script.

Ian Sutherland, Chair  
On Behalf of the Land Use Committee  
Downtown Residents Association

cc COV Planning