



Mayor Helps and Council
City of Victoria
No.1 Centennial Square
Victoria, BC
V8W 1P6

April 26, 2018

Re: Abstract Developments – Rezoning for 1010 Fort Street

Dear Mayor Helps and Council,

The DRA LUC has reviewed the drawings for the proposed building and hosted a CALUC meeting on 9 April 2018 for the above-mentioned application. Twenty-one people registered their attendance at the door.

Based on the information presented by the applicant the purpose of the Rezoning is to create a 9-storey, 56 unit market rental building with ground floor commercial space fronting Fort Street. The CALUC meeting notice was mailed to 687 recipients. The notice represented that 10 parking spaces would be provided as part of the application. At the community meeting the ten parking spaces was amended to zero parking. The applicant represented that ten “affordable” units would be committed to as part of this application.

Comments and concerns raised at the Land Use Committee public meeting and by committee members are as follows;

- The majority of attendees strongly expressed concerns regarding the height and lack of side-yard setbacks proposed for the building and how these would negatively affect what is now one of Victoria's most historic and attractive streetscapes. Several people stated that this proposed building is too high and wide for the local area. It was also noted that this building, as proposed, would be the first in a potential “solid wall” of buildings that could be built up to 14 stories high along the north side of Fort Street shadowing and creating livability issues for neighbours.
- The owners of the Jukebox expressed concerns regarding the impacts on the Jukebox because the applicant's presentation appeared to not fully address the interaction and proximity of the two buildings.
- Most attendees expressed strong concerns regarding the lack of parking in the local area and that a building without onsite parking would exacerbate the problem. It was stated that a significant number of residents in this building would

own cars and without onsite parking, they would compete with the limited, local residential and commercial supply of on-street parking.

- Attendees from the adjacent residential areas to the south stated that bylaws require any development of their low density properties to provide off street parking facilities so why would zero parking be acceptable for this application. They are also experiencing parking pressure on their residential streets from workers and residents from the nearby higher density areas seeking parking in their neighbourhood.
- Attendees expressed concern regarding impacts that lengthy construction periods would have on local businesses making their ongoing viability a challenge.
- Attendees referenced that the removal of garbage across the bike lanes would likely conflict with the bike lanes and perhaps result in additional parking loss on Fort Street.
- The applicant cited the existing zoning on the property and two projects nearby with no parking to justify the zero parking proposed for this application. It was pointed out that the two example buildings were not comparable as the Mosaic building was an existing building converted to residential in 1999 and had no capacity to supply parking and the Sawyer Building has yet to be constructed.
- Attendees were critical of the aesthetics of the building.
- While one attendee supported the use of height to mitigate urban sprawl no attendees spoke in direct support of the application

The proposed building plans show no side yard setbacks which was the source of significant community concern. This appears to contravene of DCAP guidelines that require a minimum of 3.0m for side yard setbacks.

Subsequent to the Community meeting it was learned that the 10 "affordable" housing units promoted at the CALUC meeting for this project were actually a commitment made to leverage Council approval for another project 500 meters distant at 1201 Fort Street in the Rockland neighbourhood. No other type of amenity was offered for the 1010 Fort Street application. The DRA LUC strongly objects to Council considering amenity transfers tied to projects that are subject to concurrent/subsequent re-zoning applications. This situation clearly demonstrates the potential conflict by proposing an amenity for one site and not disclosing that it is actually a commitment made for another while at the same time fettering Council's discretion; obligating one rezoning to serve the commitments of another.

Many hundreds of commercially available parking stalls in the Downtown have been lost to development in recent history eliminating substantial amounts of long and short term parking opportunities for existing residents and businesses as well as customers and visitors. A thorough review of the City's Off-Street Parking requirements and draft amendments to the existing off-street parking regulation, Schedule C, is nearing completion. Data collected during this process has indicated that minimum levels of parking are necessary for all residential buildings, including those located in the core area. Under the proposed Schedule C, this application would need to provide over 25 parking stalls. This includes reduced parking requirements allowed for the affordable units. The DRA fully supports the evidence-based recommendations of the draft Schedule C as proposed and encourages Council not to vary the requirements as set out, regardless of rationalizations such as adverse soil conditions or small site size.

During the public consultation process for the DCAP held several years ago, the proposed policy guidelines for density and height for the Fort Street corridor adopted within the current DCAP were not supported by the DRA LUC as they were considered contradictory to the "Heritage Corridor" designation and promoted much too abrupt a transition from the proposed 20m height on the south side of Fort Street to 45m on the north side. The DRA LUC suggested both sides of Fort St in this block maintain a 20m height limit with a corresponding density and have the height transition only take place on buildings fronting View Street. Despite the City of Victoria's commitment to the IAP2 process of "Involve" for this DCAP engagement process, staff chose to not respond to this input from the DRA. In any case, these concerns raised by the DRA during the DCAP engagement process were echoed by a substantial majority of attendees at this CALUC meeting.

The DRA has taken the lead over the past decade in supporting densification in the Core area. This support however is not unconditional. Council should be aware that there are outstanding public concerns with several provisions of the DCAP and while we wait patiently for the upcoming review to address those concerns, we trust Council will respond accordingly in their deliberations to the concerns clearly brought forward by the public on this particular application.

Sincerely,

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

Ian Sutherland
Chair Land Use Committee
Downtown Residents Association

cc COV Planning