

3. House Conversion Update Project

Presenters: Chloe Tunis, Planner, Development Services
Alison Meyer, Assistant Director, Development Services

Panel Questions and Comments

- In the current regulations, under-height basements do not count towards the total floor area that is eligible for conversion. Two ways to deal with under-height basements are to lower the floor level by digging down or raise the upper floors. Is either one acceptable? Chloe: Applicants are encouraged to dig down. Currently you can dig down or if you have a full-height basement, it can be raised by 2 ft. If the basement is under height, the house cannot be raised. The proposed changes would remove this restriction.
- It is a good idea to open up the possibility of changes to building form (e.g. addition of dormers) or the addition of doors and windows on the front façade of heritage houses. These changes would be in keeping with the style (i.e. Craftsman or Arts and Crafts) of many heritage-designated houses. However, new doors and windows on the front façade should be a last resort as there are other ways to access different units without these exterior changes. The onus is on staff to ensure that the changes are appropriate and sympathetic.
- Reducing parking restrictions on site provides owners with the freedom to decide how many spaces to provide. Parking in the front yard is not appropriate for heritage-designated houses as it negatively impacts the appearance of the house and the neighbourhood. The restrictions would also prevent the paving of rear yards.
- Providing an incentive for energy conservation is worthwhile. As an encouragement, it was suggested that building permit applications could be expedited for projects that are net 0 or better than the step code standards.
- What housing stock, heritage or non-heritage, is impacted by the changes? Alison Meyer: The incentive for permitted number of units is for heritage-designated buildings only; the proposed changes to the conversion regulations apply to non-heritage, heritage-registered and heritage-designated buildings.
- The current conversion regulations regarding exterior changes have negatively impacted heritage-registered and non-heritage-registered (character) buildings. The structure of the original building is lost in the conversion. The regulation changes would permit more units; however, the proposed relaxation of exterior changes would allow new cladding materials, windows (including vinyl) and doors on the front elevation, potentially destroying heritage value.
- Alison Meyer: One of the challenges with existing non-heritage-designated housing is that it is more lucrative for developers to have the building demolished. With the proposed regulations and incentives, the City is trying to address this. Sometimes buildings have already been stripped of their architectural detailing and the applicant must decide whether to demolish the building, strip the interior and acquire three units, or heritage designate and acquire two extra units.
- Which restrictions would be relaxed? Chloe Tunis: Changes to the following parts of Schedule G, Section 6, are proposed:
 - a. addition to the side of a building would not be allowed, but a new dormer would be possible
 - b. addition of an unenclosed floor space (sundeck, balcony, porch) would be allowed, but not facing the street
 - d. developing an under-height basement by raising the building would be allowed

- e. changes to the front façade of a building would be allowed, including new cladding, windows and doors
- Alison Meyer: Exterior changes to non-heritage-designated buildings would be reviewed by the Panel only if the applicant is applying for an incentive by designating the building.
- What is a bicycle parking space? Bicycle parking has become a considerable regulation that requires accommodation. Chloe Tunis: The space must be weather protected with minimum dimensions and ground or wall-mounted equipment to which to lock the bike. Allowing a small rear addition or accessory building provides flexibility to meet the bicycle parking regulations.
-
- It was suggested that staff consult with the Victoria Heritage Foundation and the Hallmark Heritage Society regarding the changes.

Moved

Seconded

That the Heritage Advisory Panel recommend that staff clarify the wording in Schedule G.

Carried (unanimous)

Moved

Seconded

That the Heritage Advisory Panel oppose item b (reduce restrictions on exterior changes) and item g (allow windows and doors on front elevations) in the staff report.

Carried (5 in favour, 2 opposed)

5. HOUSE CONVERSION REGULATIONS UPDATE – CHECK-IN

Chloe Tunis, Development Services Planner, presented an overview of the proposed updates to the House Conversion Regulations.

The Committee discussed:

- How do the proposed changes interact with the Fairfield neighbourhood plan?
 - Typically only a building permit would be required for a house conversion; this is not changing with the proposed updates to the House Conversion Regulations.
 - House conversions are a component of missing middle housing, by creating spaces within existing houses.
- The need to preserve a neighbourhood's form and character is restrictive, and prevents more supply to be developed.
 - Conversion regulations would provide a way of preserving neighbourhood character while adding more housing supply within existing houses.
- How often would house conversions displace tenants, and would they be eligible for compensation?
 - It is challenging to predict the uptake of the new regulations, and unknown how many of those converted houses are rented.
 - No Tenant Assistance Policy is required through the building permit process; this is only required through rezoning applications.
- To how many houses would the new regulations apply?
 - It is hard to say exactly; many more houses would be eligible, but it is challenging to predict the uptake.
- Would the regulations apply to both rental and strata housing?
 - Yes.
- There is no guarantee that these units would be rented; how can we ensure that this update increases the number of available rental units?
 - Even if the units are not secured as rentals, this arrangement is attractive for owners who wish to rent a couple units within a house. Compared to a new build, these units are more likely to be rented.
- How could these newly-created units be secured as rentals?
 - A housing agreement would be registered on title to secure the units as rentals, and this would require Council approval.
- The regulations would allow relatively small units; how is diversity and accessibility in rental stock promoted through these updated regulations?
 - More units could be possible per total floor area. However, the minimum floor areas still allow for unit sizes that are larger than many of the typical unit sizes in multi-family developments in the City.
 - House conversions tend to be quite varied, depending on existing configuration, creating some studio units and some larger units.
- Is there any way to encourage shared resources (e.g. washing machines) to free up unit space?
 - Changes to the requirements around decks and entryways would allow for more usable indoor space within units, rather than multiple indoor entries.

The Committee provided the following feedback:

- support for the opportunities created by the updated regulations
- the need to balance the preservation of neighbourhood character with the need to increase the number of units within the City
- concern that many old houses could be converted
- support for increasing the supply of affordable rental housing
- concern that these regulations would incentive the displacement of existing tenants (similar to demoviction)
- the need for protections for existing tenants
- concern that family homes would be broken up into multiple units, each renting for the original price of the whole house
- housing is more important than the appearance of a neighbourhood.

Staff will follow up with the Committee on ways to provide additional feedback on the proposed updates to the House Conversion Regulations.



Kyle Ryan
President, VRBA

New Home Conversion Proposal Assists Supply, Affordability

The City of Victoria is considering an important home conversion policy that may improve supply, vacancy rate and affordability.

CMHC reports vacancies in Victoria have dropped to 1%, adding to our housing challenges.

Canada's strong population growth of over half a million annually is driving demand.

About 60% are newcomers to Canada and we need to welcome them with affordable housing

They are a significant part of our strong economy – people bringing their skills and expertise.

However, CMHC also reports new housing in Greater Victoria declined by 18% last year.

New supply remains a challenge due to the cost of land, labour, materials and getting approvals.

One way to boost supply is converting older, single detached homes into multi-unit housing.

According to the city's report, the new conversion policy will:

- make it easier to convert a house to multiple units
- facilitate the creation of more units
- incentivize heritage designation as well as the creation of rental, affordable rental and affordable home ownership units

Proposed changes include:

- allowing additional conversions by changing the qualifying year of construction
- expanding opportunities to incorporate under-utilized basement and attic space
- increasing and incentivizing the permitted number of units
- relaxing restrictions related to the degree of exterior change
- revising parking and bike parking requirements.

There are several options for how quickly these proposals may be enacted.

An aggressive timeline would be appropriate considering the extent of our housing challenges.

The city's proposal appears to represent a more flexible approach to housing by assisting more supply and affordability – clear benefits to the community.

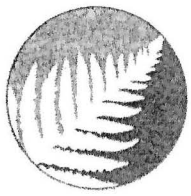
You can offer your support and provide feedback to the city, no later than February 10, by visiting <https://www.victoria.ca/EN/main/residents/planning-development/development-services/house-conversions.html>

Visit us at vrba.ca
and
careawards.ca

Follow us on
Facebook and Twitter.



VICTORIA
RESIDENTIAL BUILDERS



FERNWOOD COMMUNITY ASSOCIATION

Andrea Hudson, Acting Director
Sustainable Planning and Community Development Department
City of Victoria
Victoria, BC

RE: Proposed Changes to House Conversion Regulations

Dear Ms. Hudson,

The Fernwood Land Use Committee, with the approval of the Board of Directors of the Fernwood Community Association, are pleased to submit the following comments concerning the proposed changes to the City's regulations permitting house conversions as presented in the Committee of the Whole Report dated November 20, 2019.

On a rainy February night 16 neighbours attended Fernwood's regularly scheduled land use meeting to discuss changes the City is considering to the regulations governing house conversions. A notice of the meeting, including a copy of the Report, was sent out through our email distribution list.

In general no significant issues were raised concerning the following proposed changes: a. Qualifying year of construction; b. Reduced restrictions on exterior changes; c. Expanding opportunities to utilize under-height basements; d. Allowing attic spaces to be developed; f. Increasing and incentivizing permitted number of units; g. Allowing windows and doors on front elevations; i. Requiring bicycle parking and j. Allowing exemptions for required bicycle parking.

It is important to note there were disagreements over some of the details, particularly with regard to parking. Please note this letter is not an 'endorsement' because there are varying concerns about the impact of the parking-specific proposals. The group summarized their feelings as: "Our vision is that we can have community in the midst of densification. We agree more density is needed but disagree on what level and how to accomplish this." Those in attendance agreed that house conversions must be done in a way that preserves the character and feel of the neighbourhood and minimizes impacts on existing green space.

Rather than endorse or object, our focus is to raise questions and concerns that we believe were not addressed in the Report that we all agreed should be raised and discussed, regardless of our individual opinions.

We recognize that many of our neighbours, including some people in the room that night, live in precarious housing. We therefore urge the City to consider a number of unanticipated consequences of the new conversion proposals. In most circumstances existing tenants will be reno-victed during a house conversion and in some cases family housing could be lost if a larger unit is broken up into smaller ones. Additionally, since conversions will be expensive, there could be a loss of affordable rental housing and a proliferation of lucrative short term holiday rentals. Prior to changes being made to the Conversion Regulations we think it would be prudent of the City to review the effectiveness of the City's existing Tenant Assistance Plan to confirm that existing renters are being adequately protected.

In a similar vein, we are concerned about the proposal to incentivize the number of units by reducing minimum floor areas required. We worry this could lead to owners/ developers maximizing the number of small units in a conversion, which does not address the need in Fernwood for family rental housing. To encourage the development of family housing we encourage the City to consider incentivizing the number of bedrooms within units rather than only just the number of units (e.g. through a subsidy for multi-bedroom units).


With regard to vehicle parking in front yards it was suggested that the City require permeable parking surfaces and limit how much of the front yard can be turned into parking. Additionally, some attendees were concerned that allowing front-yard parking could threaten the character and feel of the neighbourhood, since currently there are many gardens, mature trees and lawns that the community enjoys.

With regard to decreasing the parking requirements, attendees would like the City to consider creating an exemption for houses that currently do not have driveway access. There are a number of houses in Fernwood that currently have street parking only. If such a house was converted into suites, it is possible that only one off-street parking space would be required, and the creation of a driveway to accommodate that would eliminate the existing street parking space, resulting in no net gain of parking, but a loss of green space and an additional expense.

Finally, we are not commenting on the eight items listed in the Committee of the Whole Report under the heading 'Potential Future Work' as they are not recommended for further exploration at this time. We certainly expect that when these significant changes are explored the process will include a robust consultation process.

Thank you for this opportunity to comment.

Sincerely

A handwritten signature in black ink that reads "David Maxwell". The signature is fluid and cursive, with the first name "David" and last name "Maxwell" clearly legible.

David Maxwell, Chair
Fernwood Land Use Committee

February 10, 2020

Mayor and Council
City of Victoria

Re: Next Generation Conversion Regulations – Proposed Changes

Dear Mayor and Council:

The Rockland Neighborhood Association Land Use Committee has reviewed the proposed changes to the current Conversion Regulation and is generally very supportive of the changes to drive increased density utilizing existing structures while being sensitive to the existing character of residential neighborhoods. The recommended “Run” option would hopefully facilitate the required greater housing options in a speedy manner.

We support the drive to incentivize Heritage Conversion and understand it will work to maintain the look and feel of Rockland, and the city, as the previous rounds of conversion did so well. We would recommend that articulation of the range of change to heritage structures and how those changes align with accepted heritage restoration standards be made very clear during public consultation in order to enable informed feedback.

As the report acknowledges, a full analysis of parking has not been conducted there will need to be further discussion around the parking requirements. The reduction of onsite parking and the potential to push unknown volumes onto our streets with this and other recent policy decisions (e.g. bike lanes) are likely to have a cumulative impact on neighborhood parking issues. This will continue to be a source of tension in neighbourhoods as overall density increases, and will require further analysis in the context of these proposed changes to Conversion Regulations.

Regards,

Rockland Neighbourhood Association Land Use Committee



COMMUNITY SOCIAL PLANNING COUNCIL
research·insights·solutions

Mayor and Council
City of Victoria
City Hall
1 Centennial Square
Victoria, BC
V8W 1P6

February 10, 2020

Dear Mayor and Council,

Re: Next Generation Conversion Regulations.

Thank you for the opportunity to provide our input on the Next Generation Conversion Regulations.

The Community Social Planning Council (CSPC) is an independent, non-partisan, and knowledgeable voice on social issues in BC's capital region. By fostering social innovation and integrated action on social, cultural, economic and environmental conditions the Council supports the creation of sustainable communities.

Two of our four priority work areas are housing affordability and sustainability. Both housing affordability and sustainability will be assisted by the proposed changes to the Next Generation Conversion Regulations.

In relation to the three options in the staff proposal - walk, run, or sprint - we note that both housing scarcity in Victoria and climate change are crisis-level problems, and we need to quickly mobilize a range of effective policies to address both. While there are no magic-bullet policy solutions, updating the conversion regulations would enable more and different types of housing to be available in the core urban area of the region, reducing automobile traffic and greenhouse gas emissions.

Thus the CSPC supports the adoption of the "Run" option in the staff proposal, but we urge the City to immediately launch preparations for the remainder of policies in the "Sprint" option.

We thank you again for the opportunity and for your consideration of this submission.

Yours truly,

Diana Gibson
Executive Director



Cities for Everyone supports more affordable housing and transportation, in order to provide security, freedom and opportunity for people with all incomes and abilities

www.citiesforeveryone.org

Victoria City Council
Victoria City Hall
10 February 2020
Re: **Next Generation House Conversion Regulations**

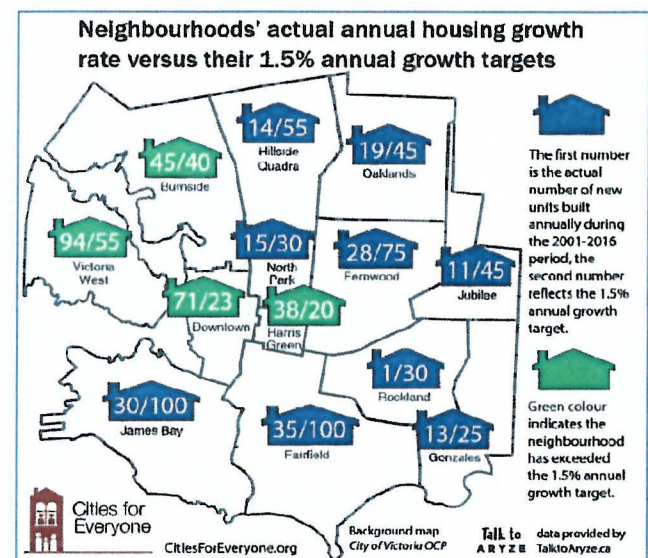
Dear Mayor and Councillors,

Cities for Everyone advocates for more affordable and inclusive housing and transportation options in our region. We are glad that Victoria is developing [New Generation of House Conversion Regulations](#) designed to allow more infill housing to be built in our residential neighborhoods. This is an important and timely initiative. Abundant research indicates that residents of compact urban neighborhoods [drive less](#), [save on transportation costs](#), are [safer and healthier](#), produce [less pollution](#), [consume less land](#), and have better [economic mobility](#) (chance that a child born in poverty becomes economically successful as an adult) than they would living in automobile-oriented areas. As a result, residential infill helps achieve our community's economic, social and environmental goals.

Cities for Everyone advocates the "[1.5% Solution](#)" which means that residential neighborhood housing supply should increase by approximately 1.5% annually to match regional population growth rates, in order to accommodate growing demand, increase affordability and achieve other community goals. According to analysis of Victoria's building approvals, most neighborhoods are adding far fewer homes than needed to achieve this target, as shown to the right.

The proposed Next Generation House Conversion Regulations can help achieve neighborhood growth targets by reducing the costs and impediments to property owners of adding more housing units. We therefore support the proposal and encourage the city to adopt the "sprint" (strongest) option because it would allow:

- Conversions in zones that currently restrict them.
- Garden suites with conversions.
- Additions that create new floor area.
- Delegated authority for parking variations.



Next Generation House Conversion Regulations
Cities For Everyone

Below are some specific comments and suggestions about this proposal.

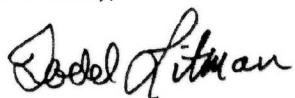
- We see little justification to limit conversions to houses built before 1985, since some newer houses are suitable for expansion. Many newer houses are large and were designed for easy conversion, using adaptable housing guidelines such as CMHC's [FlexHousing](#) standard, which allows houses to be upgraded, expanded, divided into extra units, and adapted to new uses.
- The proposed maximum heights (7.6 metre and 2.5 stories) are likely to prevent some potential house conversions. We recommend that this be increased, particularly for corner lots and larger lots where there are fewer impacts on neighbors.
- The proposal only marginally reduces off-street parking minimums. For example, it still requires 0.7 spaces for a small 450 square foot unit 1.0 spaces for a 700 sf unit, although many of the households that will occupy such housing are car-free, and the city wants to discourage car use and increase housing affordability. Many jurisdictions are [eliminating parking requirements](#), or requiring [unbundling](#) (parking rented separately from apartments) so car-free households are no longer required to pay for parking spaces they don't need. Note, eliminating parking requirements does not eliminate parking, it simply allows property owners to decide how many off-street parking spaces to provide based on their specific needs.

In many situations, off-street parking requirements actually reduce the number of parking spaces available to residents because each driveway displaces one on-street space. Most residential driveways only serve one vehicle and are only occupied part-time. As a result, adding an off-street space reduces the number of parking spaces available to neighbors. Off-street parking significantly increases development costs, increases impervious surface area and stormwater management costs, and driveways create obstacles to pedestrian, particularly wheelchair users. We therefore recommend eliminating parking minimums altogether, or be significantly reduced, and eliminated where a new driveway would serve just one vehicle.

- We would also like to ensure that residential garage spaces can be converted to living space, as many newer houses have ground-level garages that are not used to store motor vehicles and are well suited for suites with wheelchair/ disabled access.
- The proposal emphasizes the importance of preserving heritage buildings. This is desirable but should be balanced with other community goals. As the proud owner of a 1905 designated heritage home I can report from personal experience that such housing is costly to maintain and operate, and can never be as energy efficient as new housing. Not every older house deserves preservation, and to achieve our affordability and environmental goals heritage preservation should be matched with higher allowable densities on other properties. For example, if 20% of houses in an area are preserved for their heritage value, this constraint on infill development should be offset by increasing allowable densities by 20% on other properties, for example, raising maximum building heights from 2.5 to 3.0 stories.
- To reduce development costs and delays, particularly for smaller infill projects, we encourage the City to delegate project approval decisions, such as reduced parking requirements, to qualified staff.
- On a related issue, we note that many areas designated for multi-family housing in Victoria's Official Community Plan (OCP) have not be upzoned to allow the density and height required for such housing. We therefore ask the city to upzone all areas designated in the OCP for multi-family housing to accommodate those targets.

Next Generation House Conversion Regulations
Cities For Everyone

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Litman". The signature is fluid and cursive, with the first name "Todd" and last name "Litman" clearly distinguishable.

Todd Litman
Cities for Everyone

Katie Lauriston

From: David Thompson [REDACTED]
Sent: February 10, 2020 12:37 PM
To: Victoria Mayor and Council; Development Services email inquiries
Subject: Submission - Next Generation Conversion Regulations

February 10, 2020

Mayor and Council
City of Victoria
City Hall
1 Centennial Square
Victoria, BC
V8W 1P6

Dear Mayor and Council,

Re: Submission on Next Generation Conversion Regulations.

We thank you for undertaking this public consultation on the Next Generation Conversion Regulations.

PolicyLink is an independent research and consulting firm with clients in government, business and the non-profit sector across Canada. Our public policy focus areas include climate, energy, employment, economic and fiscal policy.

We make the following observations for your consideration:

1. **Policy-goal alignment.** Good public policy aligns regulation, incentives and other tools with government goals in order to achieve those goals.
2. **Greater affordability of housing and reducing greenhouse gas emissions** are stated key goal for the City of Victoria.
3. **Existing zoning bylaws in Victoria are not aligned with, and significantly undermine,** the above-noted City goals.
4. **Increasing the supply of housing** in Victoria will improve affordability compared to baseline levels, and will enable more regional residents to live closer to employment, shopping, cultural and other destinations, thus reducing greenhouse gas emissions from transportation.
5. **The overall thrust of the Next Generation Conversion Regulations "Run" proposal** would increase the supply of housing, thus aligning with and supporting the above City of Victoria key goals.
6. **The "Walk" proposal would delay and undermine** achieving progress on the goals.
7. **The "Sprint" proposal would provide greater support** to the above City of Victoria key goals. The City staff report of November 20, 2019 recommends "that the 'Sprint' level changes be explored after the potential 'Run' options have been implemented and staff have a chance to monitor the outcomes." Good public policy would set clear targets here, i.e. instructing staff to commence monitoring and preparation of all Sprint options immediately, and to report back to Council within clear timeframes, e.g. six months for the majority of Sprint options, and 12 months for the remainder.
8. **A range of further measures should be explored** in order to provide better policy alignment and support to the above goals, including:
 1. reducing non-safety related setback requirements, which restrict the supply of housing;
 2. relaxing floor space ratios and site coverage ratios, which restrict the supply of housing; and,
 3. eliminating off-street parking requirements, which restrict the supply of housing.

We thank you again for this consultation and for consideration of our submission.

With respect,

David Thompson

David Thompson

PolicyLink Research and Consulting

www.plrc.ca



Important Notice - Privileged and Confidential: The contents of this e-mail, including attachments, are strictly confidential and are intended only for the use of the individual or entity to which this e-mail is addressed. If you are not the intended recipient, or an employee or agent responsible for delivering the message to the intended recipient, please immediately notify the sender and destroy the email. Any dissemination, distribution or copying of this communication is strictly prohibited.

From: Robin Bayley [REDACTED]
Sent: January 12, 2020 2:11 PM
To: Chloe Tunis <ctunis@victoria.ca>
Subject: Re: Next Generation Conversion Regulations

Dear Chloe Tunis

I had read the staff report and listened to the COTW presentation and I was struck by various aspects relating to accessibility.

Firstly, anything to do w. parking is pertinent to accessibility, especially since there are no accessible parking rules or minimum in place in the City and have not been for over a year. If accessible parking is not supplied, it is likely that the additional units will not be available to PWD. It is a common misconception that people with disabilities do not drive. In fact, even people who use wheelchairs do, and others who are not able to partake in active transportation do so.

It is also considering incentives. Previously, there was an item in the strategic plan about incenting accessible suites in house conversions. If accessibility is not in the mix, then the incentives developed may not be sufficient to cover costs for additional needs of people with mobility impairments.

When I raise issues of accessibility, I am often told it is out of scope because the project has been conceived without an accessibility lens. And then when I raise such issues later, it is too late.

Robin Bayley
39 Linden Avenue
Victoria, BC, V8V4C9
Phone: ([REDACTED])
Mobile: [REDACTED]
[REDACTED]

From: Sean Janzer [REDACTED]
Sent: January 15, 2020 3:43 PM
To: Chloe Tunis <ctunis@victoria.ca>
Subject: Feedback on Proposed Conversion Changes

Hi Chloe,

I think the staff report is well thought out and will result in the creation of new units. Some feedback:

- Allowing changes to windows and doors to the front will be critical for unit layout
- Further to above, increasing under-height basements creates much needed livable floor space, but will likely require some exterior changes for functionality
- Given the fact that many conversions will require remediation of asbestos, houses may be "gutted" quite often. This is the perfect time to increase energy performance over the bare minimum. I think an incentive based program is important given our community's zeal for combatting climate change.
- Once implemented, if there was a guide to the house conversion process made available it would be helpful.

I sincerely hope the "run" strategy gets implemented, it will result in more rentals and ground based strata units in our community!

Thanks,

Sean Janzer
[REDACTED]
110-4460 Chatterton Way
Victoria, BC


ROYAL LEPAGE
Coast Capital Realty

Katie Lauriston

From: Jim Knock [REDACTED]
Sent: January 22, 2020 2:50 PM
To: Chloe Tunis
Subject: Conversions

Hi Chloe.

As promised, here are my 'free' observations on your updated conversion plans. These are based on a multi-decade period in Provincial Government (UVic MPA Grad) and a lifetime of experience in design, construction, finance and change management.

The attached specific comments about Conversions are based on the following basic credos:

1. Renters and rental property owners are partners who can only succeed and prosper if the other party is successful and prosperous.
2. Renters and rental property owners are bound by long standing civil laws that have been recently complicated by statute law, economic, social and political intervention.
3. Society generally accepts that all citizens have a right to receive suitable accommodation without clarifying what that means.
4. The current operating structures for providing accommodation have not stabilized.
5. The demand for rental accommodation exceeds the capacity of governments to even come close meeting without causing huge funding/taxation backlash and politically terminal backlash (i.e. major NIMBY responses and tax revolt).
6. Governments are implementing policies that are intended to create a huge wealth transfer from all rental property owners to renters; the historic idea that proportional taxation treats all investment equally is being distorted so much that it has become a major impediment to wise investment decisions.
7. The complexity of new government policy has destroyed the traditional contractual relations between renters and rental property owners; it has shifted to a renter/government and rental property owner/government triangle.
8. Like all contracts, contractual negotiations are like a chess game; each party will only sign on if they see a personal advantage for doing so.
9. Only a small minority of renters and rental property owners are problems (jerks); they only exist because government policies prevent them from being identified, exposed and thus excluded from the rental marketplace.
10. There is a huge power imbalance in the rental marketplace; renters have 1/2 months rental at risk, owners have hundreds of thousands of dollars at risk with each and every transaction.

If one accepts the validity of the above (I would propose that recent history and available data makes it difficult to deny them); then the following proposals concerning conversions should be considered:

- Do not revise existing standards without data on existing registered and illegal conversions in the target community; all UVic profs stressed the need to set desired targets and probable outcomes to enable the program to determine if it was a success
- Ensure Political acceptance is in place, not just with council but in the affected communities and throughout Municipal Inspection and Engineering Departments; NIMBY exists internally as well as in the community
- Many inexpensive rentals fly below the radar and efforts to regulate them often reduce their numbers and/or increase their rents (see recent Globe stories in Vancouver)
- Most conversions will require renovations to meet required Residential Tenancy standards, increasing renovations and tenant churning
- Without documented current numbers (informal visitation sampling would be easy and effective combined with some Assessment Corp information and city data analysis to create reasonably accurate numbers), everything will be a guess (as you admitted that during your talk). How will you or anyone else know if the city good a good return on it's investment on this housing initiative
- Over the years many other programs identified and implemented to increase available affordable rental accommodation have stalled or failed; we need to know why before we create new initiatives that may be no more successful than these earlier efforts
- The criteria for approving the changes should be simplified for easier implementation; make sure reasons for rejections are minimized and depoliticized
- Why tie heritage and other criteria into the conversions; the only purpose would be to provide hidden cross subsidization (isn't the program about increasing more affordable rentals, not to subsidize other programs)
- Why put barriers in place that increase complexity and provide more opportunities for citizens to resist increases in affordable rentals in their area (enabling NIMBY)
- The whole approval process introduces a 1-3 year delay between inception and conclusion whereas the existing informal underground process considerably shortens that process and costs less allowing for more affordable rentals; the only loser in the informal underground process is the city revenue department
- By clearly identifying and quantifying the variables associated with a new Conversion process and the planning process that must be met to obtain the necessary approvals to proceed, and then putting it on line, rental owners could work through the process on their own, learning as they go and obtain immediate approval to proceed, fast tracking the creation of additional affordable rentals
- Like automated bank loans, current technology could be easily put in place that would capture all the variables and decision trees would be thought through in advance, the approval process would be depersonalized and it would ensure all applicants were treated identically (reducing front desk time and processing delays)
- The current conversion process does not encourage the creation of affordable rental units; if that is the prime objective than the process needs rethinking

If the Planning Dept has the latitude to modify the Conversion Process and their desired outcome is an increase in affordable rentals whose capital and operating costs are not

paid for by the city, then I would suggest that there may be better ways to go about it than I saw with your presentation.

If you wish to discuss further, I would enjoy doing so at your convenience.

--

Jim Knock

1370 Dallas Road
Victoria, BC, Canada
V8S 1A1
Cel [REDACTED]

From: John Luton [REDACTED]

Sent: January 26, 2020 5:39 PM

To: Development Services email inquiries <DevelopmentServices@victoria.ca>

Subject: House conversion policy

I'm not thrilled with the idea of waiving bicycle parking requirements. Rather, the city should commit to assisting those who want to increase housing units with programs that would design creative solutions to deliver additional bicycle parking, both for any increase in numbers of residents allowed and to help retrofit existing stock to meet a growing attraction to cycling as a transportation and lifestyle choice.

Making affordable units more attractive demands that they dovetail with the emerging transportation choices of many, who are reducing their costs for transportation by cycling and walking more often. Reducing requirements for bicycle parking suppresses demand and will incent people to convert more of their property for vehicle parking.

I understand the intent of allowing front yard parking, but first choice should be developing bike parking solutions. Front yard parking adds more blacktop and attendant impacts (drainage issues, heat island effect), and reduces greenspace that is the added value of any yard. Front yard parking should be the variance of last resort.

John Luton,
Home: 22 Philippa Place
Victoria, BC V8S 1S6

[REDACTED]
[REDACTED]
[REDACTED]

Katie Lauriston

From: Development Services email inquiries
Sent: January 28, 2020 10:06 AM
To: Chloe Tunis
Subject: FW: House Conversion Regulations Feedback

Thanks!

From: L H [REDACTED]
Sent: January 26, 2020 10:03 PM
To: Development Services email inquiries <DevelopmentServices@victoria.ca>
Subject: House Conversion Regulations Feedback

Hi,

I saw information online about the city looking for feedback on house conversion regulations: <https://www.victoria.ca/EN/main/residents/planning-development/development-services/house-conversions.html>

First off, I think it's wonderful that the city is wishing to retain old homes (especially character ones) and to encourage homeowners/developers to convert them into multiple family units. This ensures some of our beautiful character/heritage buildings remain and provides more affordable housing. This is also positive for the environment, rather than sending good material to the landfill. It also keeps some of this amazing architecture around, which is one of the reasons why Victoria is so special, the character buildings also are so important to our tourism industry.

The only concern I have is parking. I live in James Bay in a lane style street. We have a few older homes that have been converted into suites. We have limited parking on one side of the road. One of the homeowners provides parking for all of her tenants, which is great. The other homeowner rents out six units and doesn't provide any parking. This can be a real problem. You have homeowners who pay big bucks in property taxes etc. and they or their guests can't park on the street at times. People get frustrated with a landlord making big profit off of tenants and not being courteous to others. It's an issue. Most tenants still have vehicles so it is important that parking is provided. I would say at the back of the home though and not at the front. When all you see is a yard full of cars it starts to make the neighbourhood look pretty unsightly. I don't see that many tenants using backyards. I think the priority should be aesthetics. Please also consider that many of these buildings will be non-smoking. It's a good idea to require landlords to provide a smoking area on the property. I have an apartment building across the way where smoking is not allowed. Until late at night people come out on the street to smoke in front of people's houses. In the summer they can be quite loud and the smell of marijuana infiltrates into homes with open windows.. As the city densifies, this is something that should be regulated.

Sincerely,

Lara Hurrell
James Bay homeowner/resident

Katie Lauriston

From: amy white [REDACTED]
Sent: January 29, 2020 11:35 AM
To: Chloe Tunis
Subject: RAC follow up

Hi Chloe,

This is Amy from the Renter's Advisory Committee - the one who was concerned about the displacement of tenants with this new proposal.

I really just want to reiterate I am extremely concerned for current tenants who are at risk of being evicted in order to make room for housing conversions. I would support this idea IF there are tenant protections in place, and it worries me that there aren't any at all.

I'll give you my own situation as an example. My husband and our 5 year old and myself live in a 3 bedroom house (with a basement) that has been purchased by a developer. Their initial proposal to demolish 3 family houses and make 48 luxury units was denied. If and when it is eventually approved, we will at least have the tenant assistance policy to aid us finally in moving and finding alternative housing. With what you are proposing now puts as directly as risk for being evicted at any moment, we don't have to wait for the development proposal to be approved, with zero protections or assistance. The owner could potentially easily say they are going to convert our unfinished basement into a unit and break up the upstairs while they are waiting for their approval and poof, we are gone! Additionally, the tenant assistance plan does not apply for tenants who have lived somewhere for less than a year, so the developer can essentially have them evicted before the year is up and again get out of assisting any tenants at all.

There are massive rocks in this plan from a tenant's perspective and I beg you to reconsider this from our point of view. Landlords unfortunately can be quick to exploit loopholes with zero repercussions and the objective of increasing housing may severely backfire for families and those living in 2+ bedroom units.

Thanks for your time,
Amy White

Sent from my iPhone

Katie Lauriston

From: Development Services email inquiries
Sent: January 30, 2020 8:26 AM
To: Chloe Tunis
Subject: FW: Feedback on proposed changes to house conversion regulations

FYI

From: Jack Sandor [REDACTED]
Sent: January 28, 2020 9:36 PM
To: Development Services email inquiries <DevelopmentServices@victoria.ca>
Subject: Feedback on proposed changes to house conversion regulations

Hi there,

My name is Jack, and I'm a resident of Victoria. I live in Rockland, and I support all the proposed changes. My only piece of feedback beyond that is that I'd like to see car parking minimums removed entirely rather than reduced. There's already a massive amount of car parking available in the city compared to every other form of transportation, and given the cities goal to reduce the number of car trips by getting people to take alternative forms of transportation (a fantastic goal!) it seems silly to mandate that parking be available.

Jack Sandor

From: Manon Elder [REDACTED]
Sent: February 6, 2020 9:40 AM
To: Chloe Tunis <ctunis@victoria.ca>
Subject: RE: FEEDBACK

Hello Chloe
Thank you.

Attic development- Homeowner would have to see if the cost is worth the development as the usable space may be too small for anything of significance other than an upper expansion to lower suite with bedrooms and bathroom.

Addition of windows letting in light is an upgrade to quality of life.

parking is a huge problem especially since bike lanes came in and wiped out street parking as it did to our rental property on Fort st. also allotting bikes for vehicles gives the message for less carbon footprint legal suites allows for garbage allowance to suites making the property cleaner. reducing height of basement suites to 6'3" allows for more legal suites

thank you
manon

From: Manon Elder [REDACTED]
Sent: February 6, 2020 1:01 AM
To: Development Services email inquiries <DevelopmentServices@victoria.ca>
Subject: FEEDBACK

Hello

I saw this down below and would like to give feedback before the feb 10, 2020 deadline. where can i do this?

or on what website can i do this?

<https://www.victoria.ca/EN/main/residents/planning-development/development-services/house-conversions.html>

I would like to see bicycles offset vehicles for parking allowances.

Attic development

exterior changes to allow staircases to attic units

basement height reduction to 6 foot 3 inches

if explanations are required for these I would be happy to provide them

best

manon elder

Katie Lauriston

From: Development Services email inquiries
Sent: February 7, 2020 4:28 PM
To: Chloe Tunis
Subject: FW: parking and house conversions

From: Denise Stocco [REDACTED]
Sent: February 7, 2020 3:54 PM
To: Development Services email inquiries <DevelopmentServices@victoria.ca>
Subject: parking and house conversions

["developmentservices@victoria.ca"](mailto:developmentservices@victoria.ca) <developmentservices@victoria.ca>

February 7, 2029

Hello,

NEXT GENERATION – HOUSE CONVERSIONS.

I would like to address the topic of “parking” in the proposed changes to regulations.

The effort to provide more housing in the city is laudable there is a real need. Most adults rely on cars for transportation. A recent survey of the neighborhood showed that 97% of people had a car. The young people who do not want cars and use bikes are still a very small minority. An increase in residents, will lead to an increase in cars in neighborhoods. I live in Fernwood. In my street there are many secondary suites (3 or 4) per house. As it is now there are cars parked on both sides of the streets day and night, leaving one lane for car circulation. Many residents use their garage as storage as well. With at least 300 adults moving in the new Caledonian project, Chambers Street and adjacent streets will be literally clogged.

Has the Municipality considered the impact of having more cars in the streets ? What steps are taken to accommodate the resulting increase in parked cars, traffic and congestion ? Are there plans to build underground or above ground parking to accommodate population/car increases? Most working people have to rely on cars to get to work. Public transport is still not convenient, cheap (free buses?) or frequent enough for people to make the switch. Car share companies have a potential for reducing the number of cars in the streets and should be supported.

Creating more housing for people is positive. Increasing the number of cars will not be, as more people will spend more time finding street parking, increasing traffic and traffic jams, pollution, etc.. For this reason the new regulations for house conversion should not go ahead until the municipality has put in place steps designed to alleviate - not make worse - parking and circulation problems.

Thank you for your attention.

Denise Stocco
[REDACTED]

Katie Lauriston

From: Eric Doherty [REDACTED]
Sent: February 8, 2020 12:36 PM
To: Lisa Helps (Mayor); Jeremy Loveday (Councillor); Ben Isitt (Councillor); Marianne Alto (Councillor); Sharmarke Dubow (Councillor); Sarah Potts (Councillor); Charlayne Thornton-Joe (Councillor); Geoff Young (Councillor); Oaklands Board; Executive Director; Development Services email inquiries
Subject: Next Generation Conversion Regulations - Proposed Changes
Attachments: E Doherty ltr re Victoria Conversion Bylaw - Feb 2020.pdf

Dear Mayor Helps and Victoria City Council members,

February 8, 2020

Re Next Generation Conversion Regulations - Proposed Changes

I would like to thank you and city staff for Victoria's forward looking proposed Next Generation Conversion Regulations.

However, I have some suggestions to strengthen these regulations, and the way they are communicated:

1) Allow conversion of houses built as recently as 2019

The suggestion I would like to emphasize the most is changing the cut-off date to the end of 2019. The written and verbal reports by staff suggests that 1985 was chosen because larger houses were permitted before this date, but did not identify any negative effects of choosing a more recent date such as January 1, 2020. (Many houses built after 1985 exceed 2500 square feet, and some exceed 4000 square feet.) If the effect of updating these regulations is positive as the staff report suggests, it will be even more worthwhile if more houses are eligible.

Newer houses are more likely to be deliberately designed for easy conversion, using adaptable housing guidelines such as CMHC's FlexHousing™ standard. CMHC states that "adaptable housing can be upgraded, expanded, *divided into extra units* or used for a variety of purposes throughout its life."^[1]

2) Garage space conversion clarity

I would also like to ensure that garage spaces within houses can be converted to living space, *and home owners are aware of this option*. Many newer houses have ground level garages at the front which is ideal for the entranceways to ground level suites. These ground level entrances are often well suited for wheelchair/disabled access.

3) Clarity regarding the conversion of common sizes of houses

The proposed conversion bylaw is applicable to commonly sized houses, not just the largest houses. It seems to allow a 2-3 bedroom suite in a modest size house. (The proposed minimum size for adding one rental unit

is only 100 m2 or 1076 square feet). However, there may be barriers in the BC Building Code posing significant barrier to larger and/or multiple rental suites.

If there are counter-productive barriers to creating rental suites in the Provincial Building Code, I would like these to be clearly identified so they can be addressed at the political level.

I would also like to have clear information on the situation regarding the feasibility of family size rental suites in common sizes of homes in Victoria. For example:

- What are the differences from building a smaller secondary suite?
- Can the owner of a house with 1,200 square feet on each of two levels feasibly put in a 1,200 square foot basement/ground floor suite?

4) Stronger incentives / protections for rental conversions

The staff report states that “new opportunities for conversions may make it more attractive to redevelop existing rental properties and, as with any redevelopment, this could result in the existing tenants being displaced.”

I believe that existing rental conversions should NOT be eligible for conversion to strata (ownership) units under this bylaw. These existing conversions, many of which provide relatively affordable rental housing, should remain as rental accommodation unless City Council is satisfied that conversion to strata is in the public interest.

I believe that the City should be ‘sprinting’ to create rental units in formerly single family houses (some of which will be homeowner created and relatively affordable).

5) Communicate intention to phase out fossil fuel heating

The staff report notes that many building suitable for conversion “still use fossil fuel heating systems [and] house conversions may give the City additional opportunities to intervene through touchpoints where low carbon heating systems and energy efficiency measures can be encouraged”

I would like to the City to immediately and clearly express its intent to require and/or incentivise non-fossil fuel heating and hot water systems in conversions in the near future. This will allow people investigating conversion possibilities to consider systems such as air source heat pumps as part of their planning, rather than getting caught unprepared by changes that may only be months away.

6) Reduce parking requirements given the climate emergency

I am also concerned that the reductions in parking requirements are so modest. Responding to the climate emergency requires cities to quickly reduce the number of private vehicles and the distances traveled by vehicles (in addition to rapid electrification of the automobile fleet). *I would like to see deeper reductions in parking requirements, especially for rental conversions.*

Please note that leading cities are eliminating parking minimums and instituting parking maximums as part of their climate emergency responses.

Thank you,

Eric Doherty

1555 Oakland Avenue

Victoria BC V8T 2L1

[REDACTED]

Cc Oakland Community Association

--

Eric Doherty, Registered Professional Planner, MCIP - Ecopath Planning

Victoria, BC Canada

NEW PHONE NUMBER [REDACTED]

[REDACTED]

www.ecoplanning.ca

Twitter @Eric_Doherty

ⁱ⁽¹⁾ <https://www.cmhc-schl.gc.ca/en/developing-and-renovating/accessible-adaptable-housing/universal-design-adaptable-housing-models>

Katie Lauriston

From: Jack Meredith [REDACTED]
Sent: February 8, 2020 11:50 PM
To: Development Services email inquiries; Chloe Tunis; Jeremy Loveday (Councillor); Lisa Helps (Mayor); ben@isitt.ca
Subject: Next Generation House Conversions Regulations - FEEDBACK

To all involved,

I would like to say how delighted I am that the City is moving ahead with updating the House Conversion Regulations.

I would also like to complement the people involved in their thoughtfulness about the many issues and for moving the update along so quickly. I think it will be a very useful tool to enable many home owners and developers to bring more housing units into the Victoria market.

For context, I am an architectural engineer specializing in Green Buildings and currently advising several clients on retrofitting existing homes to enable them to age in place and share their homes with caregivers and/or tenants.

I have the following comments and suggestions on the recommendations.

My comments are organized using the alphabetic labels in the section "Proposed Zoning Changes":

a.) Change the Qualifying Year of Construction: The recommendation is to change the qualifying year from 1931 to 1984. I am supportive of enabling more buildings to be included in the House Conversation Regulations but I fail to understand the logic of setting a new date of 1984. I can imagine many houses built after 1984 in which aging owners have more space than they need or want or are able to keep up. A house once full of family or guests or hobbies is now too large for their needs but they still want to remain in their home on the street close to their friends and neighbours. For this reason, I RECOMMEND that the Next Generation House Conversion Regulations apply to all houses in Victoria, regardless of age.

b.) Reduce Restrictions on Exterior Changes: I am totally supportive of the recommendation to allow exterior changes to the exterior of existing houses. As noted in the recommendations this should enable designs to be better configured and have units able to access outdoor space. This is highly desirable to avoid developing more substandard units. However, I RECOMMEND that this be taken further to allow exterior changes to all portions of the building INCLUDING portions of the building facing the street. I think this will not have negative esthetic impacts but rather have positive esthetic impacts by correcting poor initial designs. (Heritage Houses should obviously be required to maintain their exterior appearance.)

c.) Clarify and Expand Opportunities to Utilize Under-Height Basements:
I agree with this recommendation

d.) Allow Attic Spaces to be Developed: I agree with this recommendation to add a half story in beyond what is permitted in zoning (e.g. R1-B 2.5 storeys).

e.) Allow Vehicle Parking in Front Yard (non-heritage): I totally agree with the recommendation to allow parking in front yards. In many cases, parking is the major barrier for owners considering house conversions since access to the backyard is not possible. Further I RECOMMEND that the amount of parking not be limited to two vehicles but rather be determined by size and function. By this I mean if the front yard is large enough to accommodate the parking in a safe and aesthetically pleasing fashion then allow it.

f.) Increase and Incentivize Permitted Number of Units: I do not understand the logic of this recommendation. The recommendation is to allow the number of units based on size of building. I think I understand the need to limit the number of units is to avoid increasing the population density in the neighbourhood beyond a certain amount. What I don't understand is the logic of allowing higher population density if the units are 1. heritage or 2. rental or 3. below market ownership.) I RECOMMEND all houses are allowed to use the right column (i.e. 2 units for 80m²; 3 units for 175m²; 4 units for 240 m²; 5 units for 280 m²).

g.) Allow Windows and Doors on Front Elevation: I agree with the recommendation to allow windows and doors on the front elevation of non-heritage designated houses. In addition, I RECOMMEND that stairs also be allowed to be added in non-heritage designated houses. This would further support street oriented units; access to outdoors and allow more flexibility in floor layouts and improving poorly design houses.

h.) Decrease Parking Requirement: I am so glad the off street parking issue is being raised as it is arguably the single biggest barrier for people considering sharing their homes with caregivers and tenants. I understand the concept of basing the parking requirement on the size of units. However, I think the recommended requirements are too onerous both now and into the future as we evolve away from the single occupant vehicle paradigm. I understand this is a controversial issue but in order to increase the amount of RENTAL units in the City of Victoria I RECOMMEND that the parking requirement for RENTAL units be 1.0 stalls for units over 100m²; .5 stalls for units from 45m² to 100m² and .2 stalls for units less than 45m².

i.) Require Bicycle Parking: I totally agree with the recommendation to provide proper secured bike parking. Most people considering house conversions understand and support the need to provide this amenity.

j.) Allow Floor Area Exemption for Required Bicycle Parking. I support the recommendation to allow creation of additions or new accessory buildings to accommodate high quality bike parking.

POTENTIAL FUTURE WORK: I understand the need to limit the scope of changes in order to speed up the process but I encourage you to consider the following comments on future work.

k.) Passive House/Energy Efficiency Standards: House Conversions completed as a result of these changes will likely result in these houses remaining viable and using energy for many years to come. Consequently, I feel strongly that when these conversions are being done that energy efficiency measures be integrated into the projects. Energy retrofit technologies and techniques are well know and easily implemented, particularly during major renovations. Therefore, I RECOMMEND that it be mandatory for any house conversion have an Energuide Energy Evaluation completed so that home owners can learn about common sense energy efficiency measures and associated energy retrofit incentives that can be easily incorporated and have reasonable payback.

l.) Considering Other Zones: No comment

m.) Allow Garden Suites with Conversions: This seems like a no brainer to me. If a home owner has sufficient space for a garden suite why would it not be allowed in addition to any suites within the house. I RECOMMEND allowing Garden Suites and considering them as a "unit" within the House Conversion Regulations.

n.) Allow Additions that Create New Space: Similar to the Garden Suites comment above. If the site is appropriate why not allow minor additions as part of the House Conversion? In many cases a minor addition, may be able to improve the aesthetics of a house while adding new units. I RECOMMEND allowing home owners to undertake minor additions as part of House Conversions.

o.) Creation of floor area beyond zoning: No comment.

p.) Legalizing Unlawful Suites: No comment.

q.) Landscaping/Tree Preservation: No comment.

r.) Delegated Authority: No comment.

Thank you for encouraging feedback on the proposed House Conversion Regulations.

If you have any questions, please do not hesitate to contact me.

Jack Meredith, P.Eng. LEED Fellow Emeritus

President, HGBC Healthy Green Buildings Consultants Ltd.

[REDACTED]

Katie Lauriston

From: Ryan Jabs [REDACTED]
Sent: February 10, 2020 9:51 AM
To: Development Services email inquiries
Subject: House conversions feedback

Hi folks,

Thank you for receiving feedback around updating the city's house conversion policies. I'm at 1560 Oakland Ave and am fully supportive of loosening the regulations around house conversions, and feel that the "sprint" option is the best way to go, particularly as we fall deeper into the climate crisis we are facing.

I am a small developer, but conversions aren't my specialty and generally aren't projects I often consider. However, anything we can do to make it easier and quicker to build more housing will help with our housing crisis. More importantly, good densification of all types is key to reducing our local contribution to climate change.

And we really need to speed these processes up.

In addition, I'm very much in favour of reducing even further or eliminating all together the requirements around parking – particularly when amenities in a conversion are added to support alternative transportation. If we're serious about the climate challenges we face, we need to give people more opportunities to get out of their car and cater less to those who believe parking and car ownership is a right and a necessity. How can we really expect people to change if we continually entertain discussions around parking in one of the most walkable municipalities in Canada?

Reducing the number of parking spaces will also help with affordability for those who make the decision to go without a vehicle. And it gives owners an opportunity to plant more trees and provide more green space for residents and to help with storm water management.

Again, I appreciate you taking feedback as you consider this important policy change.

Take care,

Ryan Jabs | President, Community Builder
Lapis Homes | [REDACTED] | www.lapishomes.com
[REDACTED]

